South Oxfordshire and Vale of White Horse
Joint Local Plan 2041

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3WS7/1

Matter 7
Site Allocations

Joint Local Plan



South Oxfordshire District Council
Listening Learning Leading

Vale of White Horse District Council

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

Councils' Response:

Policy LS1 provides a justified and effective framework for the consideration of large-scale major development proposals and is consistent with national policy.

The original basis of this policy, Policy STRAT4 (Strategic Development), was found sound by the Inspector examining the South Oxfordshire Local Plan 2035 (examination library reference ALP01). The Inspector's report (examination library reference LPA101) endorses STRAT4 in paragraphs 196 and 275, pages 42 and 59. Policy LS1 builds on that established approach by bringing together, within a single policy, the key masterplanning, assessment and technical information requirements that are typically needed to support large-scale major development proposals. In doing so, it provides applicants, decision-makers and other stakeholders with a clear understanding of the information likely to be required to enable the comprehensive assessment of strategic-scale development.

The policy is also justified by its consistency with paragraph 43 of the NPPF (examination library reference LNP01), which states that "the right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations assessment and flood risk assessment)". The studies and supporting documents identified in the policy reflect established assessment processes for major development and, in some cases, the documents are required to demonstrate compliance with other Joint Local Plan policies, including those relating to whole-life carbon / energy statements and health impact assessments. The policy makes clear that requirements will depend on the characteristics and location of the site, ensuring that information requests remain proportionate to the proposal being considered.

As highlighted in the councils' Response to Key Issues (examination library reference LPA48, pages 71-72), some representations suggested that Part G of the

policy should instead be addressed through the Validation Checklist, while others raised concerns about duplication with other plan policies or the relevance of certain requirements to all applications. However, the councils' consider that the policy's scope is both justified and effective as it provides a clear continuation of the existing approach, works alongside and in consistency with other Joint Local Plan policies, and sets out the information likely to be required for the assessment of large-scale major development. While the policy should be read in conjunction with other relevant policies, including design policies and site allocations where applicable, it plays an important role in drawing together the principal requirements for comprehensive strategic development proposals.

The policy is not limited to residential development. As clarified by footnote a, it applies to specified residential and commercial forms of large-scale major development. Nor does it require every listed study or document in every case. Part 1(a) refers to requirements being applied "where appropriate", while part 1(g) refers to "relevant technical studies and supporting documents". This provides the flexibility necessary to respond to the circumstances of individual proposals and is consistent with paragraph 44 of the NPPF (examination library reference LNP01), which states that "local planning authorities should only request information that is relevant, necessary and material to the application in question".

The councils' Development Management team has confirmed that it is clear and evident how a decision maker should react to development proposals using the policy, with the supporting text explaining how its requirements should be applied in practice. When read alongside the plan as a whole, Policy LS1 enables decision-makers to identify the evidence necessary for the proper assessment of large-scale major development while maintaining sufficient flexibility to respond to different types and scales of proposal.

Policy LS1 is therefore justified by and consistent with the NPPF and the adopted policy it updates and provides a clear and proportionate framework, with enough flexibility, to help decision makers react to and assess a wide variety of development proposals.

Site-by-site responses to Q7.2.1-7.2.15

Policy AS1 – Land at Berinsfield Garden Village and Policy AS13 – Berinsfield Garden Village

Q7.2.1 (AS1) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Land at Berinsfield Garden Village (examination library reference LPA49, section 2, page 2) details the background to the site allocation. The allocation was subject to detailed examination with the outcomes recorded in the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector concluded that the strategic site selection process undertaken by SODC provided a sound basis for identifying strategic growth locations within the district (paragraphs 58-69 and 91-94). The Inspector also considered Land at Berinsfield Garden Village specifically and concluded that the allocation represented an appropriate and sustainable location for strategic growth, capable of delivering significant housing alongside the regeneration of the existing settlement (paragraphs 130-140).

Land at Berinsfield Garden Village was consequently allocated as a strategic allocation within the adopted South Oxfordshire Local Plan 2035 (SOLP) (examination library reference ALP01) which released it from the Green Belt via Policy STRAT 10i (Land at Berinsfield Garden Village). This was to deliver around 1,700 new homes, at least 5 hectares of additional employment land and supporting services and facilities. Berinsfield was awarded Garden Village status in June 2019. Policy STRAT10 of SOLP (Berinsfield Garden Village) set out the principles that development within the Garden Village, including land within the strategic allocation in Policy STRAT10i, should accord with. The Joint Local Plan therefore builds upon both a site selection process and an allocation which have previously been independently examined and found sound.

The expansion of Berinsfield is considered acceptable only if it will lead directly to the implementation of a masterplan for the regeneration of the village and the funding of the necessary regeneration package identified by SODC. Delivering growth and regeneration at Berinsfield promotes a sustainable pattern of development that will address key issues currently facing the village. Development at Berinsfield will deliver necessary and specific benefits that cannot be achieved by developing elsewhere in South Oxfordshire. The regeneration has strong community support and Policy AS1/AS13 of the Joint Local Plan seek to achieve a unique solution which could not otherwise be realised. (Please see our response to Q7.2.11 for information regarding the Berinsfield Regeneration Strategy).

Policy AS1 – Land at Berinsfield Garden Village and Policy AS13 – Berinsfield Garden Village

In preparing the Joint Local Plan, we did not simply carry forward the SOLP allocation. The site was reassessed alongside reasonable alternatives through the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). This paper explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1, pages 25-27, provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it.

The preferred option was to retain the current allocation, subject to presentational changes of the existing criteria / requirements for this site; and the allocation was ”recommended to be retained in the Joint Local Plan”.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

TOP07.1 page 11, para 2.29 and page 73 also assessed the site to determine whether it remained available, achievable and suitable for development from an employment perspective. The conclusion was that it was “available, achievable and suitable for development, with full capacity remaining. It is therefore appropriate to consider for allocation in the JLP”. This site was also assessed as part of the Employment Land Availability Assessment in the Employment Land Needs Assessment (examination library reference HES08, page 92, Table 7-6).

Q7.2.2 (AS1) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils’ Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when it was first allocated for development. Please see the Inspector’s report (examination library reference LPA101) paragraphs 130 to 140. That plan was adopted by SODC

in December 2020. There has been no change in circumstances that have caused a need for a revision to the boundary or capacity assumptions.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

As stated in paragraph 2.12 of the Statement of Common Ground for this site (examination library reference LPA49), the site promoters have progressed a detailed Masterplan Framework Document. It is common ground between us and the promoters (see paragraphs 3.9 and 3.10) that the policy is robust and soundly based and that approximately 1,700 dwellings can be delivered within the AS1 site allocation boundary.

The promoter's Regulation 19 representation asked for clarification whether the older persons accommodation was additional to the 1,700 homes. We confirmed this was the case in the councils' Response to the Key Issues (examination library reference LPA48, page 72, response 1a). Their representation also raised concerns about the delivery of pitches for Gypsies and Travellers. We confirmed our position that the Berinsfield site is a suitable and sustainable location to meet some of this need (6-10 pitches) in the councils' Response to the Key Issues (examination library reference LPA48, page 72, response 1b). This is a large allocation with capacity to accommodate a range of residential uses, including pitch provision**,** as recognised in paragraph 4.53 of the Housing Requirement, Affordable Housing, and Gypsies, Traveller, and Travelling Show People Topic Paper (examination library reference TOP03.2).

Q7.2.3 (AS1) How have the mix of uses been determined?

Councils' Response:

As a garden village, the allocation contains a mix of uses – these are primarily a range of residential uses (including older persons accommodation and Gypsy and Traveller pitches), employment and supporting services and facilities to make a sustainable garden community.

The South Oxfordshire Local Plan 2035 (examination library reference ALP01) established the main residential number of approximately 1,700 units and the employment amount of at least 5 hectares. Please see our response to Q7.2.1 for the background to these uses and their reassessment.

Policy AS1 – Land at Berinsfield Garden Village and Policy AS13 – Berinsfield Garden Village

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 60 units on this site.

The requirement for Gypsy and Traveller pitch provision (6-10 pitches for this site), has been addressed through the 'Housing Requirement, Affordable Housing, and Gypsies, Travellers, and Travelling Show People Topic Paper' (examination library reference TOP03.2, paragraphs 4.33-4.54).

Q7.2.4 (AS1) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policies AS1 and AS13, together with the relevant plan-wide policies, are appropriate to address the potential adverse impacts arising from development of Berinsfield Garden Village.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS1 assessment, pages 1-4). These effects have informed the safeguards and mitigation requirements incorporated into Policies AS1 and AS13 and the relevant plan-wide policies.

Some respondents raised concerns about potential adverse impacts relating to flood risk, water quality and wastewater infrastructure, and the diversion of bus routes. We responded to these concerns in the councils' Response to Key Issues, regarding Regulation 19 representations (examination library reference LPA48, pages 72-75 and 106-107).

With regards to flood risk, the concerns raised through representations, including by the Environment Agency, related to the need for updated evidence concerning fluvial flooding, groundwater flood risk and the suitability of the allocation in relation to flood risk constraints. Since submission of the plan, we have prepared the Level 1 Strategic Flood Risk Addendum (examination library reference LPA44) and the Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45). The Environment Agency's representations and our response are summarised in Appendix 1 of the Statement of Common Ground (examination library reference LPA67). The updated flood-risk evidence identifies limited areas of higher flood risk within the allocation and a potential groundwater flood-risk pathway, including the

possibility of groundwater emergence and ponding in localised low points (examination library reference LPA44, Appendix B, page 1). The Level 2 SFRA Update (examination library reference LPA45, Appendix A, pages 1-21) identifies appropriate mitigation through site layout, sequential design, a site-specific Flood Risk Assessment and sustainable drainage systems. Policies AS1 and AS13 are supported by plan-wide Policy CE6 (Flood Risk), which requires flood risk to be appropriately assessed and managed. The Environment Agency confirms through the Statement of Common Ground that its concerns have been satisfactorily addressed and no longer maintains any substantive objection in relation to flood risk (examination library reference LPA67, paragraph 3.7).

With regards to water quality and wastewater infrastructure, the concerns focused on the ability of wastewater infrastructure to accommodate the development and the potential implications for water quality. These matters have been addressed through the Water Cycle Study (examination library reference LPA46) and are also summarised in Appendix 1 of the Environment Agency Statement of Common Ground (examination library reference LPA67). The Water Cycle Study (examination library reference LPA46, section 4.3.5, page 38 and page 85) confirms that Berinsfield would drain to Culham STW and that planned upgrades to this facility are sufficient to addresses needs arising from this site. These upgrades are listed in the IDP (examination library reference CSD05.1, paragraph 5.3) and therefore this not considered a soundness concern.

Policies AS1 and AS13 require integrated blue-green infrastructure and SuDS, supported by the Plan-wide flood-risk and water-management policies CE6 and CE7.

We therefore consider that flood-risk and water-management effects have been appropriately assessed and can be effectively mitigated through the policy framework and detailed assessment at planning application stage.

Regarding the potential re-routing of bus services, as set out in the councils' Response to the Key Issues (examination library reference LPA48, pages 74-75), the 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 the planning application for the site and are not considered a soundness issue.

The potential adverse impacts of developing the site and the steps we have taken to mitigate them are set out below.

Transport/traffic

The transport implications of the allocation have been considered through the councils' transport evidence base (including transport modelling (examination library reference ITV03 - Transport Modelling Report) and infrastructure planning (ITV02 -

Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper)).

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.2.2-3.2.4) identifies existing and planned active travel opportunities at Berinsfield, together with gaps in the network to the north, east and south. These findings informed the requirements of Policy AS1 for enhancements to the public rights of way network and improved walking and cycling connections. The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS1 assessment, pages 1-4) similarly identifies minor positive effects overall in relation to sustainable travel, reflecting the site's accessibility to existing facilities and proposed walking and cycling infrastructure, while recognising that proximity to the A-road network may encourage some private-car use.

Policy AS1 provides for mitigation through high-quality walking and cycling infrastructure, enhanced public transport provision, a second access onto the A4074, improvements to the A4074/A415 junction and contributions towards wider transport improvements. The Transport Assessment at application stage will establish the precise form and timing of necessary mitigation.

As stated above, regarding the potential re-routing of bus services, as set out in the councils' Response to Key Issues (examination library reference LPA48, pages 74-75), the 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 the planning application for the site and are not considered a soundness issue.

We therefore consider that the transport effects of the allocation have been assessed at an appropriate level for plan-making and that the policy safeguards provide an effective framework for mitigation. Please also see our response to Q7.2.6 regarding the effects on the highway networks.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS1 assessment, pages 1-4) identifies minor negative effects in relation to pollution at Berinsfield, particularly during the construction phase. Potential effects include construction noise and air pollution, operational noise, air and light pollution, proximity to the A4074, and the presence of the Wally Corner historic landfill at the south-eastern edge of the site.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land. The SA concludes that, with the policy framework in place, only minor localised adverse pollution effects are predicted overall across the plan area (examination library reference CSD03, paragraphs 6.2.2-6.2.3, pages 41-42).

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS1 assessment, pages 1-4) identifies potential ecological effects associated with the allocation, including disturbance, lighting and effects on habitats, while also identifying opportunities for habitat creation and improved ecological connectivity. Policy AS1 responds through a landscape-led approach, substantial green infrastructure and biodiversity net gain, supported by the plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1-3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS1 assessment, pages 1-4) identifies a moderate negative effect in relation to landscape, reflecting the site's proximity to the North Wessex Downs National

Landscape and the potential for landscape and visual effects arising from local topography, particularly around Little Wittenham. It notes that the extent of these effects will depend on the scale, layout and massing of development and should be addressed through site-specific landscape assessment.

Policy AS1 responds through a landscape-led approach, requiring substantial green infrastructure, retention and enhancement of landscape features, and a design that responds to topography and visual context. In particular, part 2(l) requires appropriate landscaping throughout the site, including a permanent defensible landscaped edge to protect the Oxford Green Belt, whilst maintaining a sense of openness between Berinsfield and Drayton St Leonard and safeguarding key views towards the Chiltern Hills and Wittenham Clumps. These requirements directly address the landscape and visual effects identified through the evidence base and ensure that future development is integrated sensitively into its surroundings. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside. Overall, we consider that the potential landscape effects have been identified and that the policy provides an appropriate framework for their mitigation.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS1 assessment, pages 1-4) identifies a neutral effect in relation to the historic environment for Berinsfield. The site-specific heritage evidence is provided by the Heritage Impact Assessment prepared for the South Oxfordshire Local Plan strategic sites (examination library reference NHL02, section 4.1 pages 13 to 53). This identifies archaeological potential within the allocation, particularly in the northern part of the site, and recommends trial trenching to establish the extent, survival and significance of archaeological remains and inform an appropriate mitigation strategy. It also concludes that listed buildings at nearby Drayton St Leonard should not be affected by development (examination library reference NHL02, section 4.1.3, page 26).

We therefore consider that heritage effects have been appropriately identified and can be addressed through further archaeological investigation, mitigation and the plan-wide heritage policies.

Flood risk and water management

The updated flood-risk evidence identifies limited areas of higher flood risk within the allocation and a potential groundwater flood-risk pathway, including the possibility of groundwater emergence and ponding in localised low points (examination library reference LPA44, Appendix B, page 1). The Level 2 SFRA Update (examination library reference LPA45, Appendix A, pages 1-21) provides a more detailed site-specific assessment and identifies measures to manage flood risk through site

layout, sequential design, site-specific Flood Risk Assessment and sustainable drainage.

The Water Cycle Study (examination library reference LPA46, section 4.3.5, page 38) confirms that Berinsfield would drain to Culham STW. While planned development would significantly increase flows, projected dry-weather flow remains within the current maximum-flow permit, and Thames Water has identified Culham STW for capacity upgrades. The WCS also notes that AS1 is not expected to begin delivering homes until around 2031/32, providing time for necessary water-supply infrastructure upgrades, subject to early engagement with Thames Water (page 85).

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the proposed modification to Policy AS1 addresses the Environment Agency's soundness concern (see Q7.2.15) and that there are no outstanding flood-risk soundness concerns relating to the allocation. The Environment Agency agrees that the site is largely within Flood Zone 1 and, having revisited the Level 2 Strategic Flood Risk Assessment, confirms that there is no reason to believe the development is undeliverable, subject to the detailed modelling recommended by the Strategic Flood Risk Assessment.

Policies AS1 and AS13 require integrated blue-green infrastructure and SuDS, supported by the plan-wide flood-risk and water-management policies CE6 and CE7. We therefore consider that flood-risk and water-management effects have been appropriately assessed and can be effectively mitigated through the policy framework and detailed assessment at planning application stage.

Taken together, Policies AS1 and AS13, the relevant plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS1) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

The Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our 'Site Selection (incorporating Sequential Flood Risk and Exception Test)' Topic Paper (examination library reference TOP07.1). The Sequential Test and Exception Test were applied using the

information in our Regulation 19 version Strategic Flood Risk Assessment (SFRA) (examination library references CEQ11, CEQ11.1, CEQ12 and CEQ12.1).

Since the submission of the plan for examination, there have been two updates to the SFRA. The first update was required due to significant updates to Environment Agency (EA) national flood risk mapping in March 2025. We agreed to undertake this update in our June 2025 Statement of Common Ground (SoCG) with the EA (examination library reference LPA37, paragraph 2.6), recognising that "depending on the outcome of that process, the sequential test may need to be re-applied".

The SFRA update was completed in September 2025 (examination library references LPA44 and LPA45). As the SFRA update identified changes in flood risk to some of the site allocations proposed in the plan, the councils' re-applied the Sequential Test and Exception Test (where required). It was found that the proposed site allocations remained justified on this basis.

Shortly after the re-application of the Sequential Test and Exception Test was completed the examination of the plan was paused, and so the updated Sequential Test and Exception Test paper was not submitted at that time. When the examination process resumed in early 2026, we were already aware from our ongoing engagement with the EA that we were likely to need to undertake a further update to the SFRA and that subsequently the Sequential Test and Exception Test may need to be reapplied, so we did not submit the updated Sequential Test and Exception Test paper at that time, particularly as the Stage 2 hearings focused on other matters. We are able to provide this evidence if it would be of assistance to the Inspectors.

The SFRA is now undergoing a further update with a revised methodology for delineating the functional floodplain as agreed in our June 2026 SoCG with the EA (examination library reference LPA67) and to take account of further updates to national flood risk mapping made in July 2026. The Level 1 update is now complete and will be submitted to the examination alongside this statement. The Level 2 update is in progress, and we expect to receive draft outputs from our consultants in late October. We will need to share the draft Level 2 outputs with the EA and Oxfordshire County Council (as the Lead Local Flood Authority) and consider any comments that they provide. The final updated Level 2 SFRA will be submitted to the examination as soon as possible.

As the Level 1 update has identified further changes in flood risk to some of the site allocations proposed in the plan, we have reapplied the Sequential Test using the updated Level 1 SFRA. The proposed site allocations remain justified on this basis.

The application of the Exception Test is partly dependant on the recommendations of the Level 2 SFRA, which advises on whether development can be made safe for its lifetime. As the Level 2 SFRA update is currently in progress, we have been unable to complete the Exception Test update at the current point in time, but we will

endeavour to do so as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is not required to pass the Exception Test as it is not located in Flood Zone 3a.

Q7.2.6 (AS1) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP) (examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF (examination library reference LNP01).

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its

associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in Oxfordshire County Council's Strategic Planning Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3, paragraph 2.1) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS1) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS1 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Land at Berinsfield Garden Village. A summary of the key infrastructure requirements is provided in Section 5 of the IDP (pages 11-12), with detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing set out in Appendix 2.1: Infrastructure Requirements for Land at Berinsfield Garden Village (Policy AS1).

The infrastructure requirements identified in the IDP are reflected directly in Policy AS1:

- Part 2(d) requires the necessary regeneration package to be identified and delivered, including improvements to community facilities through the refurbishment and expansion of the Abbey Sports Centre and library to accommodate a community hub, together with appropriate health provision.
- Part 2(h) requires sufficient education capacity, including a new on-site primary school and contributions towards secondary and SEND provision.
- Part 2(j) requires the delivery of leisure provision, including a community hall, football playing pitches and a sports hall.
- Part 2(k) requires all necessary transport infrastructure and mitigation measures to support the development.

- Part 2(l), 2(m) and 2(p) require strategic landscaping, green infrastructure provision and biodiversity enhancements across the site.

Additionally, Policy LS1 (Proposals for large scale major development), which is applicable to Berinsfield Garden Village, requires in part 1(e) that development proposals must ensure that necessary supporting infrastructure is provided, including social and community infrastructure. Developers must engage with relevant infrastructure providers to ensure the implementation of the Infrastructure Development Plan. Together with the other requirements of Policy AS1, these provisions provide the framework for securing the infrastructure identified in the IDP.

The physical constraints relating to the allocation are the need to provide sufficient infrastructure capacity to support growth, together with environmental considerations relating to the adjacent Oxford Green Belt, flood risk and biodiversity. These matters are addressed through the requirements of Policy AS1 and will be considered further through the comprehensive masterplan required by part 2(a).

There are third party rights and covenants on part of the site, as set out in our SoCG with the site promoter these matters are not considered insurmountable (examination library reference LPA49, paragraph 3.1).

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan will ensure that infrastructure provision, regeneration measures and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policy AS1 and LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process having regard to the latest available evidence.

Q7.2.8 (AS1) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Land at Berinsfield Garden Village (examination library reference LPA49). Paragraph 2.1 confirms that the majority of the site is in single landownership, and paragraph 3.1 confirms that it is not subject to any insurmountable environmental,

legal, ownership, access or technical constraints that would otherwise impede development.

As explained in the latest Housing Land Supply Statement for South Oxfordshire District Council (examination library reference LPA97, page 77), South Oxfordshire District Council owns land adjoining Fane Drive, and access across this land may be needed to ensure a better integrated development with Berinsfield.

There is clear evidence of promoter interest in bringing the site forward. Our latest five-year housing land supply statement (examination library reference LPA97, pages 77-80) includes the site within the anticipated housing supply trajectory and confirms our expectation that it will contribute towards housing delivery during the plan period. This is supported by the Statement of Common Ground which confirms the ongoing partnership between the councils' and the site promoter to facilitate delivery of the allocation and records extensive pre-application engagement and technical work undertaken by the site promoter (examination library reference LPA49, paragraphs 2.12-2.14 and 5.2).

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would prevent the allocation from being capable of coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS1) How is it intended to bring the site forward for development?

Councils' Response:

The site promoter advises, through the latest five-year housing land supply statement (examination library reference LPA97, pages 77-80), that the site is expected to come forward through the submission of an outline planning application in the first quarter of 2027 and the phased delivery of development and supporting infrastructure.

The Statement of Common Ground for Land at Berinsfield Garden Village (examination library reference LPA49) confirms that preparatory work has already been undertaken to support the development of the site. This includes the preparation of a detailed Masterplan Framework Document, extensive public and stakeholder engagement, pre-application discussions with SODC and Oxfordshire County Council, and a package of technical studies covering matters including archaeology, ecology, contamination, flood risk and drainage (paragraphs 2.12-2.13). The Statement of Common Ground also confirms that Oxfordshire County Council identified that the site is in principle suitable and capable of providing deliverable access options (paragraph 2.12).

The Statement of Common Ground further confirms that the parties are committed to ongoing partnership working to support delivery of the allocation and that the site is suitable, available and developable (paragraphs 2.14 and 3.1).

SODC has also progressed work to define the regeneration priorities that will inform development of the site. Cabinet endorsed the Draft Berinsfield Garden Village Regeneration Strategy on 8 October 2026 as SODC's corporate regeneration framework. Drawing on local evidence and community and stakeholder engagement, it identifies priorities and delivery opportunities to inform discussions with the promoter and relevant partners on the necessary regeneration package for Mount Farm. The Strategy is being submitted alongside this Matters statement and remains subject to further amendment and final approval and adoption.

We are therefore satisfied that active work is underway to progress the site and that there is a clear route to the submission of a planning application and subsequent delivery of the allocation.

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

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

The Viability Report (examination library reference ITV04) determined that this site had 'marginal viability'. In the AspinallVerdi report, 'marginal viability' means that the policy-compliant Residual Land Value is positive, but less than the notional Benchmark Land Value. This is in the context of Oxfordshire which is a very high market value area of the country. Whilst Aspinall Verdi have found this site to be 'marginal' in high-level viability modelling for Local Plan viability, it is fully anticipated that this scheme will be brought forward once detailed design and value engineering is carried out in respect of the required infrastructure (even if this means negotiations must take place on land values/profit margins).

Based on a Benchmark Land Value of £53,852,480, the scheme generated a Residual Land Value of £29,649,358 (Table 9.2, page 103). Sensitivity testing concluded that the scheme could become viable at a reduced multiplier (premium) of 8x the £10,000 per acre Existing Use Value (page 105). It is arguable that, in light of the scale of infrastructure required to deliver strategic land, and the fact that this should be taken into account in defining BLV, this represents a sufficient incentive for landowners to release land for development.

The site was given an amber RAG rating for deliverability. Although promoted by experienced parties, limited progress had been made since the last local plan, and

there was a lack of clarity on the overall regeneration package required to enable the scheme.

The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a loss of minus £188,762 per net acre, as concluded in the original report (examination library reference ITV04, Table 9.3):

				Build Costs	105 = 5% increase			
Balance (RLV - BLV £ per acre (n))	(188,762)	55%	70%	85%	100%	115%	130%	145%
	90%	489,383	198,324	(94,098)	(390,492)	(755,602)	(1,149,323)	(1,543,045)
	92%	528,967	237,963	(54,260)	(349,839)	(702,281)	(1,095,665)	(1,489,387)
Market Values	94%	568,551	277,603	(14,438)	(309,382)	(649,319)	(1,042,008)	(1,435,729)
100%	96%	608,135	317,243	25,333	(269,065)	(598,280)	(988,350)	(1,382,071)
(105% = 5% increase)	98%	647,719	356,878	65,103	(228,871)	(548,619)	(934,692)	(1,328,414)
	100%	687,298	396,487	104,829	(188,762)	(499,853)	(881,034)	(1,274,756)
	102%	726,864	436,096	144,550	(148,727)	(451,674)	(827,377)	(1,221,098)
	104%	766,429	475,705	184,268	(108,760)	(406,099)	(773,827)	(1,167,440)
	106%	805,995	515,313	223,945	(68,834)	(365,298)	(720,526)	(1,113,783)
	108%	845,560	554,922	263,622	(28,944)	(324,714)	(667,851)	(1,060,125)
	110%	885,126	594,531	303,299	10,898	(284,273)	(616,963)	(1,006,467)
	112%	924,691	634,121	342,964	50,725	(243,958)	(567,272)	(952,809)
	114%	964,256	673,705	382,604	90,515	(203,747)	(518,385)	(899,152)
	116%	1,003,822	713,289	422,244	130,286	(163,622)	(470,066)	(845,494)
	118%	1,043,387	752,873	461,884	170,053	(123,564)	(422,167)	(792,072)
	120%	1,082,953	792,457	501,524	209,774	(83,552)	(380,850)	(738,771)
	122%	1,122,518	832,041	541,161	249,495	(43,593)	(340,143)	(686,419)
	124%	1,162,084	871,625	580,770	289,215	(3,680)	(299,588)	(635,646)
	126%	1,201,649	911,209	620,379	328,906	36,210	(259,165)	(585,924)
	128%	1,241,215	950,793	659,988	368,583	76,057	(218,854)	(536,940)
	130%	1,280,780	990,377	699,596	408,260	115,884	(178,635)	(488,506)

This table demonstrates that an uplift in market values of 10% would be needed to achieve viability based on the current BLV (without any reduction in the multiplier). An increase in build costs of 15% would require a 26% uplift in sales values to return to viability.

Although the housing market has been challenging in recent years and there has been little value growth, we would not expect this to sustain over the plan period. It is also noted that no growth or place-making premiums have been factored into the viability modelling – over the plan period, sales growth could significantly improve the viability conclusions.

CBRE, on behalf of Ptarmigan Land, suggest that the target affordable housing requirements render the scheme unviable. The sensitivity testing and narrative on BLV above suggest that whilst the site is shown to be marginal, it could become viable over the plan period as the market recovers.

They suggest that Future Homes Hub evidence suggests the cost uplift associated with the council's Net Zero Carbon targets is understated. AspinallVerdi's Viability Report, and the appraisals in it, are grounded in detailed work produced by experts Bioregional and Currie and Brown (examination library reference ITV04, page 59). This evidence takes into account the specific requirements of the Joint Local Plan policies and reports on the uplifts based on local build costs rather than providing a

benchmark uplift at a national level. We maintain that this provides robust evidence on which to base the assessment.

Similar to other sites, CBRE recognise that the IDP includes many items which are shown as 'To Be Confirmed'. The starting point for AspinallVerdi's assessment has been to work with the promoters, basing infrastructure costs on information provided by them, relating to both policy requirements and their masterplans. Each promoter was invited to set out the anticipated costs of delivering their schemes. This evidence was then reviewed alongside Infrastructure Delivery Plan (IDP) requirements. The total cost carried forward to the appraisals was £81,000 per dwelling, notably the highest cost for any of the allocated sites (examination library reference ITV04, Table 9.3).

As the main 'sense check' to ensure the adopted costs were proportionate, a comparison of the available infrastructure and S106 costs for each site was undertaken with the costs from the other strategic sites. This ensured any outliers were identified. Across the other sites, costs ranged from £50,182 to £81,000 per dwelling (Tables 9.2 and 9.3). The median cost was £71,562 per dwelling and 5 of the 8 sites shared costs from £70,000-£71,000 per dwelling. On this basis, the adopted cost was deemed reasonable, although higher than other sites. This was considered reasonable on the grounds that the site required the 'regeneration package'.

The IDP includes many items which were listed as 'To Be Confirmed', many of these County Council highways costs. These costs and their magnitude were unknown at the time of the assessment, and it was therefore not possible to include them in the viability assessment. The AspinallVerdi report does acknowledge this as a viability and delivery risk in its conclusions. However, it should be recognised that the infrastructure allowance made for the site on an overall basis (£81,000 per dwelling) is towards the higher end of the expected range for strategic sites in the current market. Whilst costs for some items may need to be factored into future modelling, there may also be potential for cost savings as more detail around the site is worked up. In this sense, the overall allowances made are deemed proportionate for the plan viability assessment.

Turner Morum provided a letter on the viability of Berinsfield on behalf of Ptarmigan Land. This letter suggests that, given the site demonstrates a circa £24.2m deficit in AspinallVerdi's appraisals, characterisation of the site is marginal. However, the Viability Report (examination library reference ITV04, page 44) clearly defines a marginal appraisal as one where the RLV exceeds £0 but does not meet the BLV.

Turner Morum also suggest that the GDV is overstated by placing Berinsfield in the Medium Value Zone while it is located in the Low Value Zone, as defined in the Viability Report (page 55). AspinallVerdi, after engagement with the LPA in relation to the specific characteristics of Berinsfield, considered it would be more appropriate to

test the scheme based on Medium Values. This approach was in recognition that, the site is immediately adjacent to the boundary of the Medium Value Zone. Although the existing settlement at Berinsfield currently experiences relatively low values, it was felt that this scheme will establish a new place – that the scale of the scheme and nature of the proposals is likely to see a step change in what can be achieved in this location. Similar to AS8 (Land North West of Grove), it is anticipated that this site will achieve values closer to those experienced in the Medium Value Zone. Turner Morum note that this approach differs from how the scheme was treated in the viability evidence underpinning the previous local plan, where the scheme was tested based on Low Value Zone values. The change in approach simply reflects greater consideration in terms of how this site should be treated, reflecting the scale of the opportunity.

Taking all of these considerations into account, we remain of the opinion that the development proposed at Land at Berinsfield Garden Village, including the mix of uses on the site, is viable and deliverable over the plan period.

Q7.2.11 (AS1) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Berinsfield Garden Village.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS1 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan and the Joint Design Guide (examination library reference DBE01). The masterplan is to be prepared collaboratively with South Oxfordshire District Council and in consultation with Oxfordshire County Council, submitted with the first planning application, and used to guide subsequent proposals. This provides the principal mechanism for coordinating the distribution of uses, movement, green infrastructure, connections with the existing settlement and the sequencing of development.

Policy AS13 complements this by ensuring that development of the allocation is coordinated with the regeneration of the existing Berinsfield community, so that the

new development and the existing settlement are planned together rather than as separate components.

Policy AS1 part 2(d) refers to a regeneration package for Berinsfield Garden Village, and the supporting text paragraph 8.13 makes a commitment that the council will continue work to support Berinsfield and assist in exploring detailed solutions for the regeneration of Berinsfield in accordance with Policy AS1 (Land at Berinsfield Garden Village) and Policy AS13 (Berinsfield Garden Village). This will identify the form that development should take in order to deliver the regeneration package identified. Paragraph 8.12 of the supporting text for Policy AS1 states that the expansion of Berinsfield is considered acceptable only if it will lead directly to the implementation of a masterplan for the regeneration of the village and the funding of the necessary regeneration package identified by SODC and paragraph 8.14 sets out what this regeneration package should include.

SODC has prepared and on 8 October 2026 endorsed the Berinsfield Regeneration Strategy (which will be submitted to the examination alongside this Matters statement), this provides a further mechanism for coordinating development with the regeneration needs and priorities of the existing village. The Strategy has been informed by community consultation and is intended to guide ongoing work with the site promoter and inform the regeneration package to be secured through the planning application process. The Regeneration Strategy does not predetermine the final regeneration package for Berinsfield or constitute a fixed schedule of planning obligations. The precise requirements will need to be established through the planning application process, having regard to the development plan, the purpose of the site allocation, the effects of the proposal, infrastructure evidence, viability and the statutory tests governing planning obligations (paragraph 5.8). Reflecting this progress, we propose modifications to policy AS1 and its supporting text, these are set out in our response to Q7.2.15.

The Statement of Common Ground (examination library reference LPA49) records agreement that the final regeneration package and infrastructure contributions will be agreed through the development management process and that expansion of Berinsfield is acceptable only where it leads directly to delivery of the necessary regeneration package (paragraphs 3.13–3.15).

Policy IN1 (Infrastructure and Service provision) states that new development must be served and supported by appropriate and adequate on site and off site infrastructure and services. Infrastructure requirements for Berinsfield Garden Village are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 11 and 12) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

Policy AS1 – Land at Berinsfield Garden Village and Policy AS13 – Berinsfield Garden Village

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS1) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the projected timescale and rate of development is realistic, as set out on page 80 of the South Oxfordshire Housing Land Supply Statement (examination library reference LPA97). Page 79 and 80 of LPA97 set out the conclusions made in respect of the development trajectory of the site, with the key conclusions being:

- The lead in time is based on an outline application being submitted by the 1 June 2027, as advised by the site promoter Ptarmigan. We have then used district average lead in times for sites of this size to estimate when homes would be delivered, which is 6.4 years from application submission to first completions. Ptarmigan advised that they expect the first homes to be delivered in the 2030/31 monitoring year. Whilst we consider this timetable could be achievable, given that an application has not yet been submitted we consider it prudent to use the average lead in time in this case, anticipating first homes being delivered in the 2033/34 monitoring year.
- The build out rate has been based upon Ptarmigan's anticipated build out rate, with 75 homes in the first year of delivery and 150 homes per annum following this. These delivery rates are in accordance with the district averages for sites of this size, with the average being 157 homes per annum, and therefore realistic.

Q7.2.13 (AS1) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q.7.2.2, Q7.2.4 and Q7.2.10 above, and explained why we consider the plan is sound or that a main modification is needed (see Q7.2.15).

Q7.2.14 (AS1) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

Policy AS1 – Land at Berinsfield Garden Village and Policy AS13 – Berinsfield Garden Village

The wording 'in accordance with' appears in the policies of the adopted South Oxfordshire Local Plan 2035, however upon reflection we consider a modification to replace ‘in accordance with’ with ‘having regard to’ would be justified, in respect of Policy AS1 part 2 (j)).

[PROPOSED MODIFICATION] Policy AS1, Part 2(j)

> j) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan, including delivery of a community hall, football playing pitches and sports hall;

Q7.2.15 (AS1) Are any modifications necessary in the interests of soundness?

Councils’ Response:

See our response to Q7.2.14, in respect of one modification.

A set of suggested modifications accompanied the submitted plan (examination library reference CSD01.1) this included MM12, a correction to Policy AS13:

Correct reference to Biodiversity Net Gain requirement in 2(c) as follows:

[PROPOSED MODIFICATION] Policy AS1, Part 2(c)

> c) landscape led – a green Garden Village with a minimum 38% usable green space in built-up areas, a minimum of ~~10~~**20**% biodiversity net gain and a design that responds visually to topography and aspect, with multi-functional blue-green infrastructure with integrated SuDS from rooftop to attenuation;

Since the Joint Local Plan was submitted in December 2024 work has continued on a Berinsfield Garden Village Regeneration Strategy to provide definition to the necessary regeneration package referenced in policy AS1. We propose the following main modifications to reference the strategy in policy AS1:

[PROPOSED MODIFICATION] Policy AS1, Part 2(a)

> a) that the applicants have prepared a comprehensive masterplan taking into consideration the indicative concept plan (Figure 8.1), **the Berinsfield Garden Village Regeneration Strategy,** and the councils’ Joint Design Guide.

[PROPOSED MODIFICATION] Policy AS1, Part 2(b)

> b) how the proposed development is designed to facilitate the regeneration of Berinsfield, including how it interacts and connects with the wider, existing village in accordance with the strategy for Policy AS13 (Berinsfield Garden

Village) **and having regard to the Berinsfield Garden Village Regeneration Strategy**;

[PROPOSED MODIFICATION] Policy AS1, part 2(d)

d) how the necessary regeneration package has been identified and will be delivered, referring to the Infrastructure Delivery Plan **and the Berinsfield Garden Village Regeneration Strategy**, which is likely to include the refurbishment and expansion of the Abbey Sports Centre and library to accommodate new community facilities in a "community hub". This may include new premises for an expanded health centre or alternatively premises for a new health centre provided within the new development;

[PROPOSED MODIFICATION] Policy AS1, Part 2(f)

f) a total affordable housing provision in accordance with Policy HOU3 (Affordable housing) **and having regard to the Berinsfield Garden Village Regeneration Strategy**, with a site specific mix of affordable tenures informed by robust local evidence that seeks to address existing local need, as well as rebalance the mix of housing tenures across the Garden Village;

[PROPOSED MODIFICATION] Policy AS1, Part 2(h)

h) sufficient additional education capacity, to be agreed with the Local Education Authority **and having regard to the Berinsfield Garden Village Regeneration Strategy**. This is likely to be the provision of one on site primary school and contributions to the enhancement of Abbey Woods Academy, as well as contributions to appropriate off site secondary school and Special Educational Needs and Disabilities (SEND) provision;

[PROPOSED MODIFICATION] Policy AS1, Part 2(j)

j) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan **and having regard to the Berinsfield Garden Village Regeneration Strategy**, including delivery of a community hall, football playing pitches and sports hall;

[PROPOSED MODIFICATION] Policy AS1, part 2(k)

k) how all necessary transport infrastructure based on up-to-date evidence on the impact of the development will be delivered. This should reference the latest Infrastructure Delivery Plan **Berinsfield Garden Village Regeneration Strategy**, but not be limited to ~~this~~ **these** document**s**.

To provide additional clarity, we propose an additional modification to paragraph 8.13 of the supporting text as follows:

[PROPOSED MODIFICATION] Policy AS1, Paragraph 8.13

8.13 South Oxfordshire has undertaken a number of studies which indicate that Berinsfield requires investment and regeneration. The council will continue **to** work **with residents, the site promoter and relevant partners** to support Berinsfield and assist in exploring detailed solutions for the regeneration of Berinsfield in accordance with Policy AS1 (Land at Berinsfield Garden Village) and Policy AS13 (Berinsfield Garden Village). ~~This will identify the form that development should take in order to deliver the regeneration package identified.~~ **This work will inform the form that development should take and the regeneration package to be delivered. The Berinsfield Garden Village Regeneration Strategy provides greater definition of the regeneration package referenced in Policy AS1 by identifying regeneration priorities and opportunities across a number of thematic areas. Drawing on local evidence and community and stakeholder engagement, it explains the justification for those priorities and sets out the council's corporate position to inform the preparation and assessment of development proposals. It also identifies wider regeneration opportunities across the parish that may be progressed through other development, partnership projects and external funding. The Strategy does not introduce additional planning policy requirements or predetermine the specific package to be secured through the planning application process.**

Policy AS2 – Land adjacent to Culham Campus

Q7.2.1 (AS2) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Land adjacent to Culham Campus (examination library reference LPA50, section 2, page 2) details the background to the site allocation.

The allocation was subject to detailed examination with the outcomes recorded in the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector concluded that the strategic site selection process undertaken by SODC provided a sound basis for identifying strategic growth locations within the district (paragraphs 58-69 and 91-94). The Inspector also considered Culham Campus specifically and concluded that the allocation represented an appropriate and sustainable location for strategic growth, capable of delivering significant housing (paragraphs 116-129).

The site was therefore allocated in the South Oxfordshire Local Plan 2035 (examination library reference ALP01), which released it from the Green Belt via Policy STRAT 9 - Land adjacent to Culham Science Centre. (Please note, Culham Science Centre is now known as Culham Campus). This was to deliver approximately 3,500 new homes, a net increase of at least 7.3 hectares of employment land in combination with the adjacent Science Centre, 3 pitches for Gypsies and Travellers and supporting services and facilities. The policy also confirmed the existing 10 hectares of the No.1 site were to be 'retained but redistributed' across two strategic allocations (STRAT 9 (Land adjacent to Culham Science Centre) and STRAT8 (Culham Science Centre)).

Proposed Policies AS2 and Policy AS11 (Culham Campus) provide an opportunity to deliver housing adjacent to one of the major employers in southern Oxfordshire, Culham Campus, which is owned and managed by the United Kingdom Atomic Energy Authority (UKAEA) and is the leading UK centre for fusion research and technology. It has recently been designated as the UK's first AI Growth Zone[1].

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate

[1] AI Opportunities Action Plan: government response, Department for Science, Innovation and Technology (13 January 2025): https://www.gov.uk/government/publications/ai-opportunities-action-plan-government-response/ai-opportunities-action-plan-government-response

to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 28-30 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it. The preferred option was to retain the current allocation, subject to presentational changes of the existing criteria / requirements for this site; and the allocation was 'recommended to be retained in the Joint Local Plan'.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Q7.2.2 (AS2) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when it was first allocated for development. Please see the Inspector's report (examination library reference LPA101) paragraphs 116-129. That plan was adopted by SODC in December 2020. There has been no change in circumstances that have caused a need for a revision to the boundary or capacity assumptions.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4–7.2.7, 7.2.10 and 7.2.13.

As stated in paragraph 2.12 of the Statement of Common Ground for this site (examination library reference LPA49), the site promoters CEG LPII submitted an outline planning application in 2024 (reference P24/S1759/O[2]) for an employment-led mixed-use development at the No.1 Site (the eastern parcel of the site allocation), with all matters reserved. This is accompanied by Masterplan

[2] Planning Application P24/S1759/O, South Oxfordshire District Council: https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P24/S1759/O

Framework Document. It is common ground between us and the promoters (see paragraphs 3.10 and 3.21) that the policy is robust and soundly based and that the site has capacity for 3,500 homes.

The promoter's Regulation 19 representation also raised concerns about the need for pitches for Gypsies and Travellers in the policy, asking for removal of this requirement. We confirmed our position that the Culham site is a suitable and sustainable location to meet some of this need (6-10 pitches) in the councils' Response to Key Issues (examination library reference LPA48, page 78, response 7). This is a large allocation with capacity to accommodate a range of residential uses, including pitch provision**,** as recognised in paragraph 4.53 of the Housing Requirement, Affordable Housing, and Gypsies, Traveller, and Travelling Show People Topic Paper (examination library reference TOP03.2).

Q7.2.3 (AS2) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses – these are primarily a range of residential uses (including older persons accommodation and Gypsy and Traveller pitches), supporting services and facilities and optimising the use of existing employment land at the No.1 site.

The South Oxfordshire Local Plan 2035 established the main residential number of approximately 3,500 units and optimising the use of existing employment land at the No.1 site. Please see our response to Q7.2.1 for the background to these uses and their reassessment.

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 60 units on this site.

The requirement for Gypsy and Traveller pitch provision (6-10 pitches for this site), has been addressed through the 'Housing Requirement, Affordable Housing, and Gypsies, Travellers, and Travelling Show People Topic Paper' (examination library reference TOP03.2, paragraphs 4.33–4.54).

Q7.2.4 (AS2) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS2, together with the relevant plan-wide policies, are appropriate to address the potential adverse impacts arising from development at Land adjacent to Culham Campus.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS2 assessment, pages 5-9). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS2 and the relevant plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to the Key Issues, (examination library reference LPA48, pages 75-79). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport and Traffic

Some respondents raised concerns about potential adverse impacts (due to the scale of the site allocation) relating to traffic and transport (for example, traffic pressures on Abingdon and congestion around Culham and Clifton Hampden). The transport implications of the allocation have been assessed through the Transport Modelling Report (examination library reference ITV03, sections 4.3 and 4.5), which considers the allocation as part of the Joint Local Plan growth and the associated transport network assumptions.

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.3.1–3.3.3) provides a site-specific assessment of active travel opportunities and missing links. It identifies existing and planned connections to the wider walking and cycling network and identifies the railway as a restriction on east-west movement. These findings have informed Policy AS2, including requirements for enhancements to the public rights of way network, connections across the railway and waymarking to the Oxford Green Belt Way.

We have also considered the transport concerns raised through representations, and responded to them in the council's Response to Key Issues (examination library reference LPA48), including traffic impacts, delivery of the HIF1 project, walking and cycling connections and the role of Culham railway station (where some were concerned it risked becoming a Parkway). We have worked closely with Oxfordshire County Council as the highways authority throughout preparation of the Joint Local Plan (see examination library reference LPA48, pages 77–79).

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS2 assessment, pages 5-9) identifies moderately positive effects overall in

relation to sustainable travel. This reflects the site's good accessibility to existing facilities (including Culham train station, three bus stops, National Cycle Route #5 and two Public Rights of Way), as well as to proposed walking and cycling infrastructure. The SA does also recognise that proximity to the A-road network may encourage some private-car use.

Policy AS2 provides for mitigation through high-quality walking and cycling infrastructure, enhanced public transport provision and new junctions onto the A415, as well as contributions towards Culham railway station improvements and elements of the Didcot Garden Town HIF1 scheme. Transport Assessment at application stage will establish the precise form and timing of necessary mitigation.

Overall, we consider that the transport implications of the allocation have been appropriately assessed and that the evidence and Policy AS2 identify the measures necessary to support sustainable transport and active travel. Please also see our response to Question 7.2.6 regarding the effects on the highway network.

Flood Risk and Water Management

Some respondents raised concerns about potential adverse impacts relating to flood risk (for example, increasing flood risk to Culham village), water quality and wastewater infrastructure. The Environment Agency raised concerns with water quality and the evidence base and requested strengthening the policy in relation to flood risk. We responded to many of these concerns in the councils' Response to Key Issues (examination library reference LPA48, pages 75-79). However, the updated evidence provides a detailed assessment of flood risk affecting the allocation and identifies the measures necessary to manage those risks through site layout, sequential design, a site-specific Flood Risk Assessment and sustainable drainage.

Since submission of the plan, we have prepared the Level 1 Strategic Flood Risk Addendum (examination library reference LPA44) and the Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45). The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, Appendix A, AS2 site assessment) concludes that, based on the information available, the site should be capable of passing part (b) of the Exception Test, subject to its recommendations being considered through the site-specific Flood Risk Assessment and before detailed site design.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the proposed modification to Policy AS2 addresses the Environment Agency's soundness concern and that there are no outstanding flood risk soundness concerns relating to the allocation (see our response to Q7.2.15, where this modification is set out). The Environment Agency agrees that the site is largely within Flood Zone 1 and confirms that there is no

reason to believe the development is undeliverable. It also agrees that the unmodelled ordinary watercourses affecting the site are not a soundness concern.

The Water Cycle Study Detailed Report (examination library reference LPA46 , section 4.3.5) considers the implications of planned growth for Culham Sewage Treatment Works. It identifies the need for Joint Local Plan growth to be taken into account when planning upgrades to the works, including increases in biological capacity, dry weather flow, flow to full treatment and storm tank volume.

The Water Cycle Study also confirms that the Land adjacent to Culham Campus would drain to Culham Sewage Treatment Works. While planned development would significantly increase flows, projected dry-weather flow remains within the current maximum-flow permit, and Thames Water has identified Culham Sewage Treatment Works for capacity upgrades. The Water Cycle Study also notes there will be time for necessary water-supply infrastructure upgrades, before the site begins delivery of homes, subject to early engagement with Thames Water (examination library reference LPA46, page 85).

We therefore consider that the potential flood risk and water management effects of the allocation have been appropriately assessed and that the evidence identifies the measures and further assessment necessary to address them as development comes forward.

Pollution

Some respondents raised concerns about potential adverse impacts (due to the scale of the site allocation) relating to air quality and pollution in general. The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS2 assessment, pages 5-9) identifies moderate negative effects in relation to pollution at Culham Campus, particularly during the construction phase where noise and air pollution could potentially affect nearby residents and the Europa School UK. The site is also in close proximity to the A415 (Abingdon Road) and the railway which could serve as noise and air pollution sources.

The site falls within dark skies zone E1 (natural dark zone), so there is an increased risk of light pollution effects. The River Thames also runs along the northern site boundary, which brings a risk of water pollution during construction.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land. The SA concludes that, with the policy framework in place,

only minor localised adverse pollution effects are predicted overall across the plan area (examination library reference CSD03, paragraphs 6.2.2–6.2.3, pages 41-42).

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and plan-wide policy requirements.

Nature conservation and biodiversity

Some respondents raised concerns about potential adverse impacts (due to the scale of the site allocation) relating to biodiversity, nature conservation and ecological buffers. The Environment Agency asked for specific wording amendments regarding the River Thames ecological buffer zone. We addressed this point on page 76 of LPA48, explaining why we do not consider this change is needed, as Policy HP10: Watercourses and its supporting text already set out the councils' position on buffer zone requirements for watercourses.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS2 assessment, pages 5-9) identifies minor (mixed) ecological effects on habitats, including hedgerows, arising from light or other disturbance. It identifies opportunities for habitat creation and improved ecological connectivity but also notes that the Culham Brake SSSI and associated Ancient Woodland have the potential to be negatively affected by development, especially during construction, although this would be dependent on the nature and scale of works.

Policy AS2 responds through a landscape-led approach, requiring substantial green infrastructure and biodiversity net gain, supported by the plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1-3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

Some respondents raised concerns about potential adverse impacts (due to the scale of the site allocation) relating to landscape. The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS2 assessment, pages 5-9) identifies a negligible negative effect in relation to landscape, given that the site lies more than 2km from any National Landscape. The extent of any more localised landscape and visual effects will be dependent on the scale, layout and massing of the development coming forward.

Policy AS2 follows a landscape-led approach, requiring substantial green infrastructure, retention and enhancement of landscape features, and a design that responds to topography and visual context. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that the policies of the plan provide an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS2 assessment, pages 5-9) identifies a moderate negative effect in relation to the historic environment for Culham Campus, primarily because a Grade II* Listed Building (Culham station ticket office and waiting room) falls partially within the site boundary and there are four other Grade II Listed Buildings within 500m of the site. The features associated with the railway are less likely to suffer setting impacts, but the setting of the Europa School to the west may be impacted. Nuneham Courtenay Grade I Registered Park and Garden/conservation area lies immediately to the east of the site and there is potential for setting impacts associated with views towards the development, depending on scale and massing.

The site-specific heritage evidence is also provided by the Heritage Impact Assessment prepared for the South Oxfordshire Local Plan strategic sites (examination library reference NHL02, section 4.4 pages 135-174).

To mitigate these potential impacts, Policy AS2 requires a site layout and form that respects and conserves the setting of heritage assets within and beyond the site.

Taken together, Policy AS2, the relevant plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal

effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS2) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 – Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is required to pass the Exception Test as it is proposed for a more vulnerable use (housing) and that a very small part of the site is located in Flood Zone 3a, albeit no housing is proposed in that part.

Q7.2.6 (AS2) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport

Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in Oxfordshire County Council's Strategic Planning Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS2) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS2 – Land adjacent to Culham Campus

Policy AS2 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Land adjacent to Culham Campus. A comprehensive list of the infrastructure requirements is provided in Section 5 of the IDP (pages 13-14), with detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing set out in Appendix 2.2: Infrastructure Requirements for Land adjacent to Culham Campus (Policy AS2).

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the Infrastructure Delivery Plan.

Policy AS2 highlights the main infrastructure requirements of this site:

- Part 2(d) requires sufficient education capacity, including two new on-site primary schools and one on-site secondary school, and contributions towards SEND provision;
- Part 2(e) (f) (h) and (i) require improvements to community facilities and services, including provision of convenience floorspace, sufficient health care capacity and contributions; provision of a new library on site or contributions towards library provision in the area; and provision of a new police 'touchdown' facility on site;
- Part 2(g) requires the delivery of leisure provision, including delivery of a community hall, football and cricket playing pitches, MUGA, tennis and netball courts;
- Part 2(j) requires all necessary transport infrastructure and mitigation measures to support the development;
- Part 2(n) and 2(s) require strategic landscaping, green infrastructure provision and biodiversity enhancements across the site.

Additionally, Policy LS1 (Proposals for large scale major development), which is applicable to Land adjacent to Culham Campus, requires in part 1e that development proposals must ensure that necessary supporting infrastructure is provided, including social and community infrastructure. Developers must engage with relevant infrastructure providers to ensure the implementation of the Infrastructure Development Plan. Together with the other requirements of Policy AS2, these provisions provide the framework for securing the infrastructure identified in the IDP.

The physical constraints relating to the allocation are the need to provide sufficient infrastructure capacity to support growth; environmental considerations relating to the adjacent Oxford Green Belt, flood risk and biodiversity; and overhead power lines

running across the site. These matters are addressed through the requirements of Policy AS2 and will be considered further through the comprehensive masterplan required by part 2(a).

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan will ensure that infrastructure provision and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policies IN1, AS2 and LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process, having regard to the latest available evidence.

Q7.2.8 (AS2) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Land adjacent to Culham Campus (examination library reference LPA50). Paragraph 2.14 and 2.15 confirm that CEG LPII controls the land and has promotion agreements in place with all landowners across the site. Paragraph 3.2 confirms that the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

There is clear evidence of promoter interest in bringing the site forward. Our latest five-year housing land supply statement (examination library reference LPA97, pages 73-76) confirms that there is currently an application under consideration (P24/S1759/O[3]) for employment development on the site covering the Culham No.1 site part of the allocation. The site promoter has also engaged in pre-application discussions with SODC and Oxfordshire County Council to bring forward the wider housing site.

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would

[3] Planning Application P24/S1759/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P24%2FS1759%2FO

prevent the allocation from coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS2) How is it intended to bring the site forward for development?

Councils' Response:

Please see Q7.2.8 above highlighting that there is currently an application under consideration (P24/S1759/O[4]) for employment development on the site covering the Culham No.1 site part of the allocation. The site promoter also advises, through the latest five-year housing land supply statement (examination library reference LPA97, pages 73-76), that the wider housing site is intended to be brought forward through an outline planning application, anticipated to be submitted by the end of 2027. The promoter has indicated that development could be delivered through at least two and possibly up to three developer outlets.

The statement also confirms that a full suite of technical surveys have been undertaken. Baseline surveys of the site have been carried out in respect of ecology, ground conditions, landscape and archaeology, which were used to inform the Framework Masterplan and proposals for the No.1 site (both submitted through application P24/S1759/O).

We are therefore satisfied that active work is underway to progress the site, currently through the planning application for the No.1 part of the allocation, and that there is a clear route to the submission of the wider housing site planning application and subsequent delivery of the allocation.

Q7.2.10 (AS2) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

Yes, the development proposed under Policy AS2, including the mix of uses on the site, is viable and deliverable over the plan period.

The Viability Report (examination library reference ITV04) determined that this site was viable. Based on a Benchmark Land Value of £200,000 per net acre, the

[4] Planning Application P24/S1759/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P24%2FS1759%2FO

scheme generated a Residual Land Value of £268,647 per net acre (Table 9.3, page 104), resulting in a viability surplus of circa £26.5m.

Although viable, the site received an amber RAG rating for deliverability as a minimum land value was not disclosed. However, the site is being actively promoted and generates a relatively healthy viability surplus. On this basis, the site was broadly considered viable and deliverable.

The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a viability surplus of £88,647 per net acre, as concluded in the original report (examination library reference ITV04, Table 9.2):

		Build Costs 105 = 5% increase						
Balance (RLV - BLV £ per acre (n))	88,647	55%	70%	85%	100%	115%	130%	145%
	80%	512,661	255,230	(3,596)	(277,591)	(608,885)	(960,675)	(1,312,512)
	82%	547,623	290,256	31,627	(235,754)	(562,453)	(913,819)	(1,265,656)
Market Values	84%	582,586	325,269	66,813	(194,884)	(516,276)	(866,963)	(1,218,800)
100%	86%	617,548	360,282	101,984	(159,191)	(470,257)	(820,108)	(1,171,944)
(105% = 5% increase)	88%	652,510	395,295	137,121	(123,596)	(425,322)	(773,252)	(1,125,089)
	90%	687,473	430,308	172,246	(88,083)	(381,575)	(726,396)	(1,078,233)
	92%	722,435	465,317	207,359	(52,639)	(338,531)	(679,540)	(1,031,377)
	94%	757,398	500,302	242,442	(17,250)	(295,928)	(632,685)	(984,521)
	96%	792,360	535,288	277,525	18,091	(253,651)	(585,990)	(937,666)
	98%	827,317	570,273	312,599	53,379	(211,624)	(539,631)	(890,810)
	100%	862,261	605,259	347,645	88,647	(173,998)	(493,484)	(843,954)
	102%	897,205	640,244	382,690	123,870	(138,162)	(447,453)	(797,098)
	104%	932,149	675,230	417,736	159,079	(102,450)	(402,345)	(750,243)
	106%	967,093	710,215	452,772	194,250	(66,829)	(358,362)	(703,387)
	108%	1,002,037	745,188	487,785	229,422	(31,283)	(315,106)	(656,531)
	110%	1,036,981	780,150	522,798	264,549	4,195	(272,297)	(609,676)
	112%	1,071,925	815,113	557,811	299,674	39,610	(229,836)	(563,115)
	114%	1,106,869	850,075	592,824	334,794	74,984	(189,339)	(516,810)
	116%	1,141,813	885,037	627,838	369,877	110,325	(153,238)	(470,693)
	118%	1,176,757	920,000	662,851	404,960	145,611	(117,283)	(424,652)
	120%	1,211,701	954,962	697,836	440,042	180,889	(81,448)	(379,408)

This table demonstrates that the scheme could sustain a 4% reduction in market sales values before becoming unviable. However, based on an increase in build costs of circa 15%, an increase in sales values of approximately 10% would be required to maintain viability. Although house prices have seen little growth since the study was undertaken and build costs have been volatile, we would not expect this to sustain over the plan period. We also draw attention to the fact that the viability modelling included no house price growth or placemaking premiums. Research shows that value premiums are relatively common for strategic sites with significant investment in infrastructure. It is also noted that no growth is included in the viability modelling – over the delivery timescales, sales growth could significantly improve the viability conclusions.

On this basis, we consider that the allocation will be viable and deliverable over the plan period.

With regard to representations made in relation to the site, Carter Jonas, on behalf of CEG, have raised concerns about the robustness of BNG costs. The costs associated with BNG were taken from a research study prepared for the councils' (examination library reference ITV04, page 58).

Carter Jonas have also raised wider concerns regarding the cumulative impact of the plan policies and the fact that HIF and transport measures are not fully accounted for in the IDP (and therefore the viability evidence). The Viability Report (examination library reference ITV04, page 20) explains how the cumulative impact of emerging policies is dealt with. A comprehensive policies matrix was used to determine the policies with a direct impact on viability and to ensure that costs were allowed for in the modelling.

The starting point for AspinallVerdi's assessment has been to work with the site promoters, basing infrastructure costs on information provided by them, relating to both policy requirements and their masterplans. Each promoter was invited to set out the anticipated costs of delivering their schemes. Notably, the promoter in this case did not provide a response to this request. AspinallVerdi therefore took into account costs taken from their previous assessment of the site under the previous local plan (assumptions which were found sound), and this infrastructure list was compared with the IDP to check whether any additional items should be included. This resulted in an additional £590,100 of cost.

Additionally, and as the main 'sense check' to ensure the adopted costs were proportionate, a comparison of the available infrastructure and S106 costs for each site was undertaken with the costs from the other site allocations. This ensured any outliers were identified. Following moderation of the promoter's cost plan, a cost of £71,930 per dwelling was carried forward for Land Adjacent to Culham Campus to the appraisals (examination library reference ITV04, Table 9.2). Across the other sites, costs ranged from £50,182 to £81,000 per dwelling (Tables 9.2 and 9.3). The median cost was £71,562 per dwelling and 5 of the 8 sites shared costs from £70,000-£71,000 per dwelling. On this basis, the adopted cost was deemed reasonable.

The IDP includes many items which were listed as 'To Be Confirmed', many of these County Council highways costs. These costs and their magnitude were unknown at the time of the assessment, and it was therefore not possible to include them in the viability assessment. The AspinallVerdi report does acknowledge this as a viability and delivery risk in its conclusions. However, it should be recognised that the infrastructure allowance made for the site on an overall basis is within the typically expected range for strategic sites in the current market overall. Whilst costs for some items may need to be factored into future modelling, there may also be potential for cost savings as more detail around the sites is worked up. In this sense, the overall allowances made are deemed proportionate for the plan viability assessment.

Taking these considerations into account, we remain of the opinion that the development proposed at Land Adjacent to Culham Campus, including the mix of uses on the site, is viable and deliverable over the plan period.

Q7.2.11 (AS2) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Land adjacent to Culham Campus.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS2 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan and the Joint Design Guide (examination library reference DBE01). The masterplan is to be prepared collaboratively with South Oxfordshire District Council and in consultation with Oxfordshire County Council, submitted with the first planning application, and used to guide subsequent proposals. This provides the principal mechanism for coordinating the distribution of uses, movement, green infrastructure, connections and the sequencing of development.

The Statement of Common Ground (examination library reference LPA50, paragraph 3.11) records agreement that the general site requirements identified in Policy LS1 and the site-specific requirements set out in Policy AS2 identify the key requirements for this site to deliver.

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for Land adjacent to Culham Campus are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 13-14) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS2) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the projected timescale and rate of development is realistic, as set out on page 76 of the South Oxfordshire Housing Land Supply Statement (examination library reference LPA97). Page 75 and 76 of LPA97 set out the conclusions made in respect of the development trajectory of the site, with the key conclusions being:

- As part of the outline planning application (P24/S1759/O[5]) for employment development, a framework masterplan has already been submitted to SODC. This masterplan followed months of collaborative meetings between the applicant, SODC, OCC and other key stakeholders. As such, the masterplan is already agreed which should expedite pre-application discussions relating to the residential application.
- The lead in time is based on an outline application being submitted towards the end of 2027, as advised by the site promoter. We have then used district average lead in times for sites of this size to estimate when homes would be delivered, which is 6.4 years from application submission to first completions. The site promoter advised that they expect the first homes to be delivered in the 2032/33 monitoring year. Whilst we consider this timetable could be achievable, given that an application has not yet been submitted we consider it prudent to use the average lead in time in this case. We therefore project first completions coming forward in the 2034/35 monitoring year.
- The build out rate has been based upon district averages for sites of this size, with the average being 157 homes per annum. We have therefore identified 78 homes in the first year of delivery and 157 homes per annum following this.

Q7.2.13 (AS2) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q7.2.2, Q7.2.3, Q7.2.4 and Q7.2.10 above, and explain why we consider the plan is sound or that a main modification is needed (please see Q7.2.15).

[5] Planning Application P24/S1759/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P24%2FS1759%2FO

Q7.2.14 (AS2) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording 'in accordance with' appears in the policies of the adopted South Oxfordshire Local Plan 2035, however upon reflection we consider a modification to replace 'in accordance with' with 'having regard to' would be justified, in respect of Policy AS2 part 2 (e) and 2 (g).

[PROPOSED MODIFICATION] Policy AS2, part 2(e)

> e) sufficient health care capacity and contributions, likely to include one new GP surgery on site to serve existing and future demand in this area, ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan;

[PROPOSED MODIFICATION] Policy AS2, part 2(g)

> g) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan, including delivery of a community hall, football and cricket playing pitches, MUGA, tennis and netball courts;

Q7.2.15 (AS2) Are any modifications necessary in the interests of soundness?

Councils' Response:

Yes, we would like to make modifications to this policy in the interests of soundness as follows:

- See our response to Q7.2.14, in respect of two modifications.
- We would like to propose a main modification to the policy text at part 2 (p), as set out and agreed in our Statement of Common Ground with the Environment Agency (examination library reference LPA67, page 13). This is to ensure alignment with national policy. The proposed modification is set out below:

[Proposed Modification] Policy AS2, part 2(p)

> p) a layout that has land remaining undeveloped to the northern border of the site, that should be utilised for floodplain storage, protecting the physical boundary features on the site; and a layout where there is no built development within Flood Zones 2 and 3 **or the design flood extent (1% AEP plus an appropriate allowance for climate change),** other than essential **infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) -**and green

infrastructure **that has been demonstrated to not increase flood risk elsewhere**;

In their Regulation 19 representation the EA suggested further additions to Policy AS2 part 2(p) related to site-specific flood risk assessments. However, we do not consider this is a soundness concern as requirements for site specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.

Policy AS3 – Land South of Grenoble Road

Q7.2.1 (AS3) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Land South of Grenoble Road (examination library reference LPA51, section 2, page 2) details the background to the site allocation.

The allocation was subject to detailed examination with the outcomes recorded in the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector concluded that the strategic site selection process undertaken by SODC provided a sound basis for identifying strategic growth locations within the district (paragraphs 58-69 and 91-94). The Inspector also considered Land South of Grenoble Road specifically and concluded that the allocation represented an appropriate and sustainable location for strategic growth, capable of delivering significant housing (paragraphs 141-151).

The site was therefore allocated in the South Oxfordshire Local Plan 2035 (examination library reference ALP01), which released it from the Green Belt via Policy STRAT 11 - Land South of Grenoble Road. This was to deliver approximately 3,000 new homes, provide at least 10 hectares of employment land incorporating an extension to the Oxford Science Park, a Park and Ride site adjacent to the A4074 and supporting services and facilities.

The site is located to the south of Oxford, at the edge of South Oxfordshire District. It will provide specific benefits that would not be achievable elsewhere in the district – for example, the provision of a new mobility hub to the south of Oxford, an extension to the Oxford Science Park and the ability to contribute to the regeneration of Blackbird Leys.

It is bordered on its northern edge by the Oxford Science Park, a caravan park, the Oxford Sewage Treatment Works (STW), the Kassam Stadium, an entertainment area, and The Leys neighbourhoods. The Statement of Common Ground (paragraph 2.8) confirms that Magdalen College and Thames Water are the site landowners. However, during the Regulation 19 Publicity Period for the JLP, Thames Water, as statutory undertaker for the area (rather than as landowner), submitted a representation seeking to remove a parcel of land to the south and east of the Oxford STW from the site allocation and retain the land for upgrades to the STW, thereby safeguarding its future expansion.

Both parties agree that Policy AS3 and the accompanying Concept Plan need to be updated via a modification to reflect Thames Water's retention of land for potential

future expansion of the Oxford STW. Both parties agree that the councils weren't aware of the retention of land at the launch of the publication period in October 2024, as Thames Water hadn't internally agreed this at that point in time. The councils are proposing a modification to the plan (please see question 7.2.15 for this site) to reflect this amended site area.

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 34-35 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it.

The preferred option was to retain the current allocation, subject to presentational changes of the existing criteria / requirements for this site; and the allocation was 'recommended to be retained in the Joint Local Plan'.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

TOP07.1 page 11, para 2.29 and page 73 also assessed the site to determine whether it remained available, achievable and suitable for development from an employment perspective. The conclusion was that it was 'available, achievable and suitable for development, with full capacity remaining. It is therefore appropriate to consider for allocation in the JLP'. This site was also assessed as part of the Employment Land Availability Assessment in the Employment Land Needs Assessment (examination library reference HES08, page 92, Table 7-6).

Q7.2.2 (AS3) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when

it was first allocated for development. Please see the Inspector's report (examination library reference LPA101) paragraphs 141-151. That plan was adopted by South Oxfordshire District Council in December 2020. Our responses to Q7.2.1 and Q7.2.15 explain a change in circumstances that has caused a need for a revision to the site boundary only.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4–7.2.7, 7.2.10 and 7.2.13.

As stated in paragraphs 3.7 and 3.16 in the Statement of Common Ground for this site (examination library reference LPA51) it is common ground between us and the promoters that the policy is robust and soundly based and that the site has capacity for approximately 3,000 homes.

The promoter's Regulation 19 representation raised concern about the policy's requirement for Gypsy and Traveller pitches. We confirmed our position that the Grenoble Road site is a suitable and sustainable location to meet some of this need (6-10 pitches) in the councils' Response to Key Issues (examination library reference LPA48, page 82, response 6a). This is a large allocation with capacity to accommodate a range of residential uses, including pitch provision**,** as recognised in paragraph 4.53 of the Housing Requirement, Affordable Housing, and Gypsies, Traveller, and Travelling Show People Topic Paper (examination library reference TOP03.2).

Q7.2.3 (AS3) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses – these are primarily a range of residential uses (including older persons accommodation and Gypsy and Traveller pitches), employment, a mobility hub serving the A4074 corridor and supporting services and facilities.

The South Oxfordshire Local Plan 2035 (examination library reference ALP01) established the main residential number of approximately 3,000 units and the employment amount of at least 10 hectares. Please see our response to Q7.2.1 for the background to these uses and their reassessment.

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 60 units on this site.

The requirement for Gypsy and Traveller pitch provision (6-10 pitches for this site), has been addressed through the 'Housing Requirement, Affordable Housing, and Gypsies, Travellers, and Travelling Show People Topic Paper' (examination library reference TOP03.2, paragraphs 4.33-4.54).

The requirement for a mobility hub was originally identified by the Oxfordshire Local Transport Plan 4[6] (Oxfordshire County Council (2016)). Oxfordshire County Council also recently undertook a study to help identify requirements for new and improved Park & Rides, including locations of new sites and their likely car parking capacities. Though this study is not in the public domain, a recent Oxfordshire County Council Place Scrutiny and Overview Committee report[7] (paragraph 53, page 9) highlights that the study continues to recommend a "new P&R site on along the A4074 corridor at Land South of Grenoble Road (of around 600 spaces)".

Q7.2.4 (AS3) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS3, together with the relevant plan-wide policies, are appropriate to address the potential adverse impacts arising from development at Land South of Grenoble Road.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 10-14). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS3 and the relevant plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to Key Issues (examination library reference LPA48, pages 79-80). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

[6] Local Transport Plan 4 (LTP4), Oxfordshire County Council (2016): https://www.oxfordshire.gov.uk/transport-and-travel/local-transport-and-connectivity-plan/local-transport-plan-4

[7] Bus Services and Rural Transport, Oxfordshire County Council Place Overview and Scrutiny Committee (22 April 2026): https://mycouncil.oxfordshire.gov.uk/documents/s81597/Place%20OSC%2022%20April%202026%20Bus%20Services%20and%20Rural%20Transport.pdf?

Flood Risk and Water Management

Some respondents raised concerns about potential adverse impacts relating to flood risk, water quality and wastewater infrastructure. Representations, including from the Environment Agency, related to the need for updated evidence concerning fluvial flooding and the capacity at the Oxford Sewage Treatment Works. Oxfordshire County Council suggested an amendment to the policy for clarity that a flood risk assessment is required. We responded to these concerns in the councils' Response to Key Issues, regarding Regulation 19 representations (examination library reference LPA48, pages 79-80).

The updated flood-risk evidence, including the Level 1 Strategic Flood Risk Assessment Addendum (examination library reference LPA44, Appendix B) identifies areas of fluvial and surface water flood risk within the allocation and a groundwater flood-risk pathway.

The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS3 site assessment) provides the more detailed site-specific assessment. It concludes that the site can be allocated, based on the information available, provided that vulnerable development avoids the functional floodplain and the significant surface water flow path along the drainage ditch through the centre of the site. It also identifies mitigation, including retaining the drainage ditch within the landscaping design, detailed drainage measures, further investigation of groundwater conditions, emergency planning and further modelling through the site-specific Flood Risk Assessment. The Level 2 assessment also concludes that, based on the information available and the climate-change proxies used, part (b) of the Exception Test should be capable of being passed, subject to its recommendations being addressed through the site-specific Flood Risk Assessment and before detailed site design.

Wastewater from AS3 would drain to Oxford Sewage Treatment Works. The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.7) identifies that Oxford Sewage Treatment Works currently faces infrastructure-capacity issues and that additional flows could present an environmental risk. However, it also identifies a programme of upgrades. Thames Water's Phase 1 works are expected to increase inlet capacity, and the Environment Agency has confirmed that it is satisfied that the Phase 1 works will enable planned development to be accommodated without deterioration in water quality once delivered. The study further explains that the majority of Joint Local Plan allocations draining to Oxford Sewage Treatment Works are not expected to begin delivering homes until around 2030 onwards and that, provided the current upgrade works are delivered as planned, there should be sufficient capacity to accommodate the Joint Local Plan allocations.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the proposed modification to Policy AS3 addresses the Environment Agency's soundness concern and that there are no outstanding flood-risk soundness concerns relating to the allocation. The Environment Agency agrees that the site is largely within Flood Zone 1 and confirms that development could still be accommodated within Flood Zone 1 if detailed modelling increases the extent of Flood Zones 2 and 3. Detailed modelling of the Northfield and Littlemore Brooks would also be required, with a drainage ditch on the site as recommended by the Strategic Flood Risk Assessment.

Policy AS3 requires the development to respond appropriately to flood risk, alongside the requirements of the plan-wide flood-risk and water-management policies, including Policy CE6 (Flood risk) and Policy CE8 (Water quality, wastewater infrastructure and drainage). A Detailed Flood Risk Assessment, drainage design and infrastructure requirements can therefore be established and secured as the development progresses through masterplanning and the planning application process.

We therefore consider that flood-risk and water-management effects have been appropriately assessed and can be effectively mitigated through the policy framework and detailed assessment at planning application stage.

Transport and Traffic

The transport implications of the allocation have been considered through our transport evidence base. The Transport Modelling Report (examination library reference ITV03) includes Policy AS3 within the allocations tested through the transport modelling, including approximately 3,000 homes and 10 hectares of employment land (Table 4-1).

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.4.1–3.4.4) identifies a range of existing and planned active travel opportunities around the allocation, including strategic active travel routes and public rights of way providing connections towards Oxford and the surrounding area. It also identifies gaps in connections to the Oxford Green Belt Way and the need to promote Shakespeare's Way through the allocation and opportunities to improve public rights of way connections between the strategic active travel network and the B480.

These findings informed the requirements of Policy AS3 for new and enhanced public rights of way, including improved connections eastwards to the Oxford Green Belt Way, improved access towards Oxford City, and the promotion and wayfinding of Shakespeare's Way.

Policy AS3 provides for mitigation through walking and cycling infrastructure, public transport improvements and provision of a mobility hub serving the A4074 corridor. A

Transport Assessment at the planning application stage will establish the precise form and timing of necessary mitigation.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 10-14) identifies minor positive effects overall in relation to sustainable travel. This reflects the site's moderate accessibility to the bus network (although service provision is not frequent at all local bus stops), as well as to proposed walking and cycling infrastructure. The SA does also recognise that proximity to the A-road network may encourage some private-car use.

Overall, we consider that the transport implications of the allocation have been appropriately assessed and that the evidence and Policy AS3 identify the measures necessary to support sustainable transport and active travel. Please also see our response to Question 7.2.6 regarding the effects on the highway network.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 10-14) identifies minor negative effects in relation to pollution at Land South of Grenoble Road, particularly during the construction phase when noise and air pollution could potentially affect nearby residents. The site is also in close proximity to the A4074 and lies immediately adjacent to the Oxford City AQMA, consequently new residents could be exposed to poor air quality or noise pollution, particularly in the western part of the site.

There are two small historic landfills within the site and potential for contamination effects during construction and post development, if remediation is not carried out appropriately.

The site also falls within dark skies zones E1, E2 and E3 with an increased risk of light pollution effects, particularly in the southern areas of the site.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and plan-wide policy requirements.

Nature Conservation and Biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 10-14) identifies negligible adverse effects on biodiversity, noting that boundary hedgerows and small pockets of woodland supporting protected/ notable species could potentially be impacted by construction works. The Sandford Brake local wildlife site (directly adjacent to the site) and a very small pocket of Ancient Woodland (375 m to the east) could both potentially be adversely affected by disturbance.

Policy AS3 responds through a landscape-led approach, substantial green infrastructure and biodiversity net gain, supported by the plan-wide requirements of Policy NH2. Any potential small losses to the local wildlife site would be mitigated by the policy requirement to extend this woodland.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1 – 3.8 and 5.1).

Additionally, regarding nature conservation, Natural England's representation highlighted that sites AS3 and AS4 have the potential to result in increased visitor pressure and recreational disturbance to a number of Sites of Special Scientific Interest around Oxford, and advised that the provision of 3 hectares of accessible open green space per 1,000 population should be delivered on-site at these locations, with the requirement added to the policy itself. We consider this addressed via Policy HP7 - Open Space on New Developments, which does require the provision of the amount of accessible open space requested. As the plan is to be read as a whole, Policy HP7 would apply to this site.

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 10-14) identifies a negligible negative effect in relation to landscape, given that the site lies more than 2km from any National Landscape. The extent of any more localised landscape and visual effects will be dependent on the scale, layout and massing of the development coming forward.

Policy AS3 follows a landscape-led approach, requiring substantial green infrastructure, retention and enhancement of landscape features, and a design that responds to topography and visual context. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that the policies of the plan provide an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 10-14) identifies a negligible negative effect in relation to the historic environment for Land South of Grenoble Road.

The site is within 500m of two Grade II and one Grade II* Listed Buildings, and one Scheduled Monument. The closest feature is the Minchery Farmhouse (GII*) on the northern side of Grenoble Road. The Scheduled Monument to the south-west is a pottery site with ring ditches and ridge and furrow. Setting impacts are unlikely, particularly as the setting already appears to be partially compromised by surrounding industrial uses.

The site-specific heritage evidence is provided by the Heritage Impact Assessment prepared for the South Oxfordshire Local Plan strategic sites (examination library reference NHL02, section 4.4 pages 135-174). This identifies archaeological potential within the allocation, and recommends targeted excavation to establish the extent, survival and significance of archaeological remains and inform an appropriate mitigation strategy. It recommends high-quality design, including suitable landscaping and retention of historic field boundaries to mitigate impacts on heritage assets/listed buildings. It also concludes that the majority of listed buildings visible from the site should not be affected by development, with careful planning to avoid excessive visibility. The impact on Minchery Farmhouse is given a less than substantial to moderate impact and the report suggests to mitigate impacts by maintaining the historical landscape to the south of the listed building (examination library reference NHL02, section 4.4.3, page 149).

To mitigate any potential impacts, Policy AS3 requires a site layout and form that respects and conserves the setting of heritage assets within and beyond the site through sensitive planting.

Taken together, Policies AS3, the relevant plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS3) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS3 – Land South of Grenoble Road, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is required to pass the Exception Test as it is proposed for a more vulnerable use (housing) and that a very small part of the site is located in Flood Zone 3a, albeit no housing is proposed in that part.

Q7.2.6 (AS3) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in Oxfordshire County Council's Strategic Planning Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common

Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS3) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS3 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Land South of Grenoble Road. A comprehensive list of the infrastructure requirements is provided in Section 5 of the IDP (pages 15-16), with detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing set out in Appendix 2.3: Infrastructure Requirements for Land South of Grenoble Road (Policy AS3).

Policy IN1 (Infrastructure and Service Provision), states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the Infrastructure Delivery Plan.

Policy AS3 highlights the main infrastructure requirements of this site:

- Part 2(d) (e) and (g) require improvements to existing community facilities and services, appropriate provision of convenience floorspace and provision of a new library on site or contributions towards library provision in the area;
- Part 2(h) requires sufficient education capacity, including a new on-site primary school and on-site secondary school, and contributions towards SEND provision;
- Part 2(f) requires the delivery of leisure provision, including delivery of a community hall, football and cricket playing pitches, MUGA, tennis and netball courts;
- Part 2(i) requires all necessary transport infrastructure and mitigation measures to support the development, including a new mobility hub on site;
- Part 2(m) and 2(p) require strategic landscaping, green infrastructure provision and biodiversity enhancements across the site.

Additionally, Policy LS1 (Proposals for large scale major development), which is applicable to Land South of Grenoble Road, requires in part 1e that development proposals must ensure that necessary supporting infrastructure is provided, including social and community infrastructure. Developers must engage with relevant

infrastructure providers to ensure the implementation of the Infrastructure Development Plan. Together with the other requirements of Policy AS3, these provisions provide the framework for securing the infrastructure identified in the IDP.

The physical constraints relating to the allocation are: the need to provide sufficient infrastructure capacity to support growth; environmental considerations relating to the adjacent Oxford Green Belt, flood risk and biodiversity; and overhead power lines running across the site. These matters are addressed through the requirements of Policy AS3 and will be considered further through the comprehensive masterplan required by part 2(a). A further constraint, as highlighted in the supporting text to the policy at paragraph 8.35 (page 198), is the Sewage Treatment Works next to the site allocation which 'generates a significant odour issue'. This matter is therefore addressed through the requirement in part 2(j) where a comprehensive odour assessment must be completed and submitted prior to the commencement of development, with appropriate mitigation measures implemented in accordance with the recommendations of the odour assessment.

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan will ensure that infrastructure provision and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policies IN1, AS3 and LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process, having regard to the latest available evidence.

Q7.2.8 (AS3) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The landowners of the site are Thames Water and Magdalen College. Paragraph 3.8 of the Statement of Common Ground for Land South of Grenoble Road (examination library reference LPA57) confirms that the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

There is clear evidence of developer and promoter interest in bringing the site forward. Our latest five-year housing land supply statement (examination library

reference LPA97, pages 95-98) confirms that Magdalen College appointed GummerLeathes as a master developer for the site. In 2020, MC sought pre-application advice from South Oxfordshire, Oxford City, and Oxfordshire County Council. In November 2025, SODC and Magdalen College signed a Planning Performance Agreement, which includes masterplanning work, ahead of an indicative timetable to submit a planning application in June 2027. A series of meetings and workshops are underway with the LPA.

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would prevent the allocation from coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS3) How is it intended to bring the site forward for development?

Councils' Response:

The site promoter advises, through the latest five-year housing land supply statement (examination library reference LPA97, pages 95-98), that the site is intended to be brought forward through the submission of an outline planning application (expected in June 2027), with all matters reserved except access, and that 'work is actively progressing to deliver this site with a view to accelerating delivery at the earliest opportunity'.

As described in 7.2.8 above, a Planning Performance Agreement, which includes masterplanning work, has been signed and a series of meetings and workshops are underway with the LPA. The site promoter has also advised that ongoing work continues in relation to ecology, flood risk, drainage and highways. Updated surveys in relation to trees, and other on-site constraints will be undertaken alongside the progression of workshops with the LPA. The site promoter is working to understand the impact of odour on the site and the possible odour mitigation. (Also see our response to 7.2.7 regarding this).

We are therefore satisfied that active work is underway to progress the site and that there is a clear route to the submission of a planning application and subsequent delivery of the allocation.

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

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

The Viability Report (examination library reference ITV04) determined that this site had 'marginal viability'. In the AspinallVerdi report, 'marginal viability' means that the policy-compliant Residual Land Value is positive, but less than the notional Benchmark Land Value. This is in the context of Oxfordshire which is a very high market value area of the country. Whilst AspinallVerdi have found this site to be 'marginal' in high-level viability modelling for Local Plan viability, it is fully anticipated that this scheme will be brought forward once detailed design and value engineering is carried out in respect of the required infrastructure (even if this means negotiations must take place on land values/profit margins).

Based on a Benchmark Land Value of £570,000 per net acre, the scheme generated a Residual Land Value of £443,221 per net acre (£167,903 per gross acre) (Table 9.3, page 104). Sensitivity testing concluded that the scheme could become viable at a reduced BLV of £425,000 per net acre (page 106).

The site received an amber rating in terms of deliverability. This principally related to the marginal viability. The site is being actively promoted, although work had halted until a better understanding of transport requirements was available. Details of existing use values were provided by the promoters, although minimum land values were not. It is therefore unclear that the RLV generated by the appraisals would sufficiently incentivise land release for development.

The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a loss of minus £126,779 per net acre, as concluded in the original report (examination library reference ITV04, Table 9.3):

				Build Costs	105 = 5% increase			
Balance (RLV - BLV £ per acre (n))	(126,779)	55%	70%	85%	100%	115%	130%	145%
	90%	870,070	440,764	10,933	(420,010)	(899,803)	(1,419,541)	(4,287,034)
	92%	928,581	499,291	69,486	(361,339)	(831,124)	(1,346,270)	(3,692,558)
Market Values	94%	987,091	557,818	128,037	(302,668)	(762,521)	(1,274,789)	(3,104,684)
100%	96%	1,045,602	616,345	186,588	(244,025)	(693,979)	(1,204,283)	(2,525,735)
(105% = 5% increase)	98%	1,104,113	674,872	245,138	(185,402)	(625,517)	(1,134,404)	(1,961,700)
	100%	1,162,624	733,399	303,689	(126,779)	(558,812)	(1,064,858)	(1,610,609)
	102%	1,221,135	791,925	362,240	(68,157)	(500,015)	(995,560)	(1,532,822)
	104%	1,279,646	850,450	420,791	(9,534)	(441,223)	(926,445)	(1,455,349)
	106%	1,338,157	908,961	479,342	49,077	(382,467)	(857,472)	(1,379,210)
	108%	1,396,668	967,472	537,893	107,660	(323,739)	(788,613)	(1,305,924)
	110%	1,455,179	1,025,982	596,443	166,243	(265,012)	(719,854)	(1,234,178)
	112%	1,513,687	1,084,493	654,979	224,826	(206,312)	(651,194)	(1,163,357)
	114%	1,572,190	1,143,004	713,506	283,408	(147,641)	(582,581)	(1,093,148)
	116%	1,630,693	1,201,515	772,033	341,991	(88,970)	(521,805)	(1,023,378)
	118%	1,689,196	1,260,026	830,560	400,574	(30,299)	(462,895)	(953,854)
	120%	1,747,698	1,318,537	889,087	459,157	28,372	(404,030)	(884,539)
	122%	1,806,201	1,377,048	947,614	517,728	87,000	(345,176)	(815,387)
	124%	1,864,704	1,435,559	1,006,141	576,278	145,623	(286,384)	(746,371)
	126%	1,923,207	1,494,070	1,064,668	634,829	204,245	(227,592)	(677,475)
	128%	1,981,710	1,552,581	1,123,195	693,380	262,868	(168,819)	(608,664)
	130%	2,040,213	1,611,092	1,181,722	751,931	321,491	(110,092)	(544,053)

This table demonstrates that an uplift in values of 6% would be sufficient to achieve viability at the adopted BLV. Should build costs increase by 15%, then the sales values would need to increase by 20% to achieve a viable position. Although house prices have seen little growth since the study was undertaken, this is unlikely to

persist over the plan period. Values in the area have been relatively resilient, and it is expected that the market will return fairly quickly in this area on stabilisation of the wider economy. Research also shows that such value premiums have been achieved at strategic sites through high-quality placemaking alone. It is also noted that no growth is included in the viability modelling – over the delivery timescales, sales growth could significantly improve the viability conclusions.

The costs included in the viability assessment for net zero carbon buildings are based on robust evidence prepared by Bioregional and Currie and Brown (examination library reference ITV04, page 59). We therefore consider that the costs of achieving these policies are sufficiently evidenced and suitably accounted for in the viability assessment.

The Viability Report also explains how the cumulative impact of emerging policies is dealt with (page 20). A comprehensive policies matrix was used to determine the policies with a direct impact on viability and to ensure that costs were allowed for in the modelling.

On this basis, and although the site is currently shown to be marginal in viability terms, we consider that Land South of Grenoble Road, including the mix of uses on the site, will be viable and deliverable over the plan period.

Q7.2.11 (AS3) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Land South of Grenoble Road.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS3 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan and the Joint Design Guide (examination library reference DBE01). The masterplan is to be prepared collaboratively with South Oxfordshire District Council and in consultation with Oxfordshire County Council, submitted with the first planning

application, and used to guide subsequent proposals. This provides the principal mechanism for coordinating the distribution of uses, movement, green infrastructure, connections and integration with existing neighbourhoods and the sequencing of development.

The Statement of Common Ground (examination library reference LPA49, paragraph 3.10) records agreement that the general site requirements identified in Policy LS1 and the site-specific requirements set out in Policy AS3 identify the key requirements for this site to deliver.

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for Land South of Grenoble Road are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 15-16) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

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

Councils' Response:

Yes, the projected timescale and rate of development is realistic, as set out on page 98 of the South Oxfordshire Housing Land Supply Statement (examination library reference LPA97). Page 97 of LPA97 sets out the conclusions made in respect of the development trajectory of the site, with the key conclusions being:

- The lead in time is based on an outline application being submitted by June 2027, as advised by the site promoter Savills. We have then used district average lead in times for sites of this size to estimate when homes would be delivered, which is 6.4 years from application submission to first completions. Savills advised that they expect the first homes to be delivered in the 2032/33 monitoring year. Whilst we consider this timetable could be achievable, given that an application has not yet been submitted we therefore forecast first completions would take place in line with district averages. Assuming the site promoters' submit this by June 2027, we forecast first completions from 2033/34.
- The build out rate is then based upon 50 homes being completed towards the end of 2033/34, building up to 300 homes per annum. These delivery rates are realistic forecasts as compared with similarly sized developments in the districts.

Q7.2.13 (AS3) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q7.2.2, Q7.2.3, Q7.2.4 and Q7.2.10 above, and explain why we consider the plan is sound or that a main modification is needed (see Q7.2.15).

Q7.2.14 (AS3) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording 'in accordance with' appears in the policies of the adopted South Oxfordshire Local Plan 2035, however upon reflection we consider a modification to replace 'in accordance with' with 'having regard to' would be justified, in respect of Policy AS3 part 2 f).

[PROPOSED MODIFICATION] Policy AS3, part 2(f)

> f) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan, including delivery of a community hall, football and cricket playing pitches, MUGA, tennis and netball courts;

Q7.2.15 (AS3) Are any modifications necessary in the interests of soundness?

Councils' Response:

Yes, we would like to make modifications to this policy in the interests of soundness as follows:

- See our response to Q7.2.14, in respect of one modification.

- We would like to propose a main modification to the policy text at part 2(k), as set out and agreed in our Statement of Common Ground with the Environment Agency (examination library reference LPA67, page 13). This is to ensure alignment with national policy. The proposed modification is set out below:

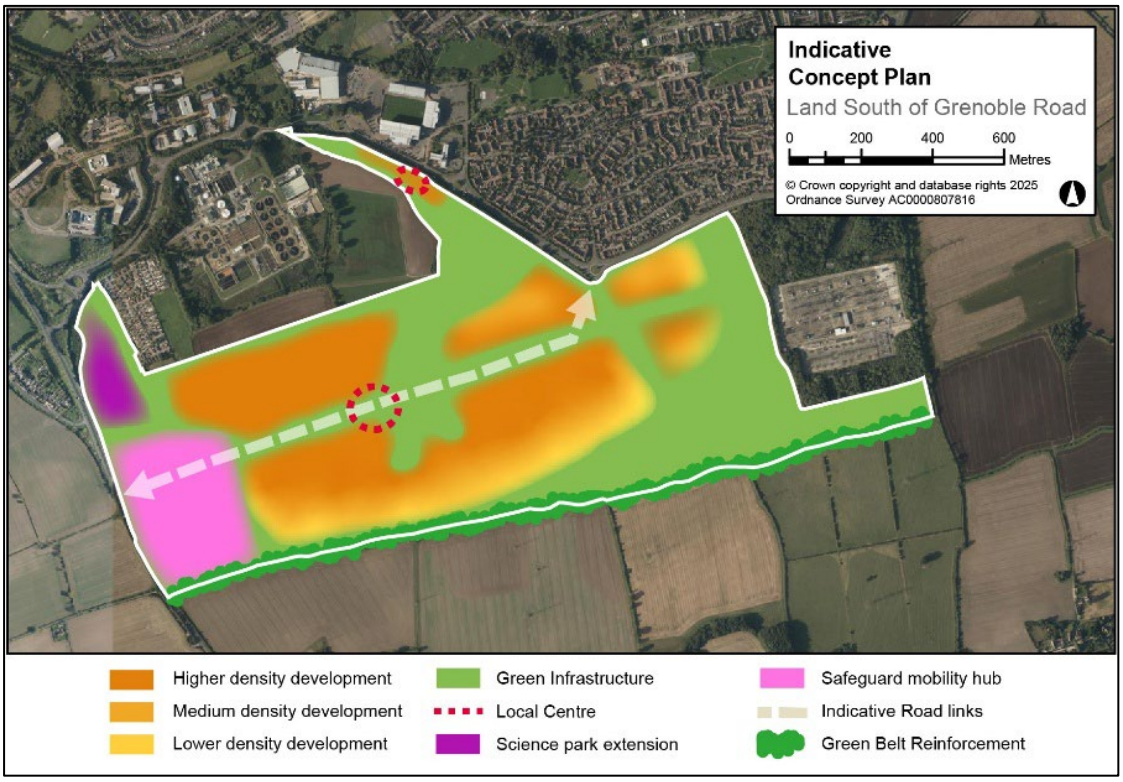
[Proposed Modification] Policy AS3, part 2(k)

k) that there is no built development in Flood Zones 2 and 3 **or the design flood extent (1% AEP plus an appropriate allowance for climate change),** other than essential **infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) -** and green infrastructure **that has been demonstrated to not increase flood risk elsewhere**

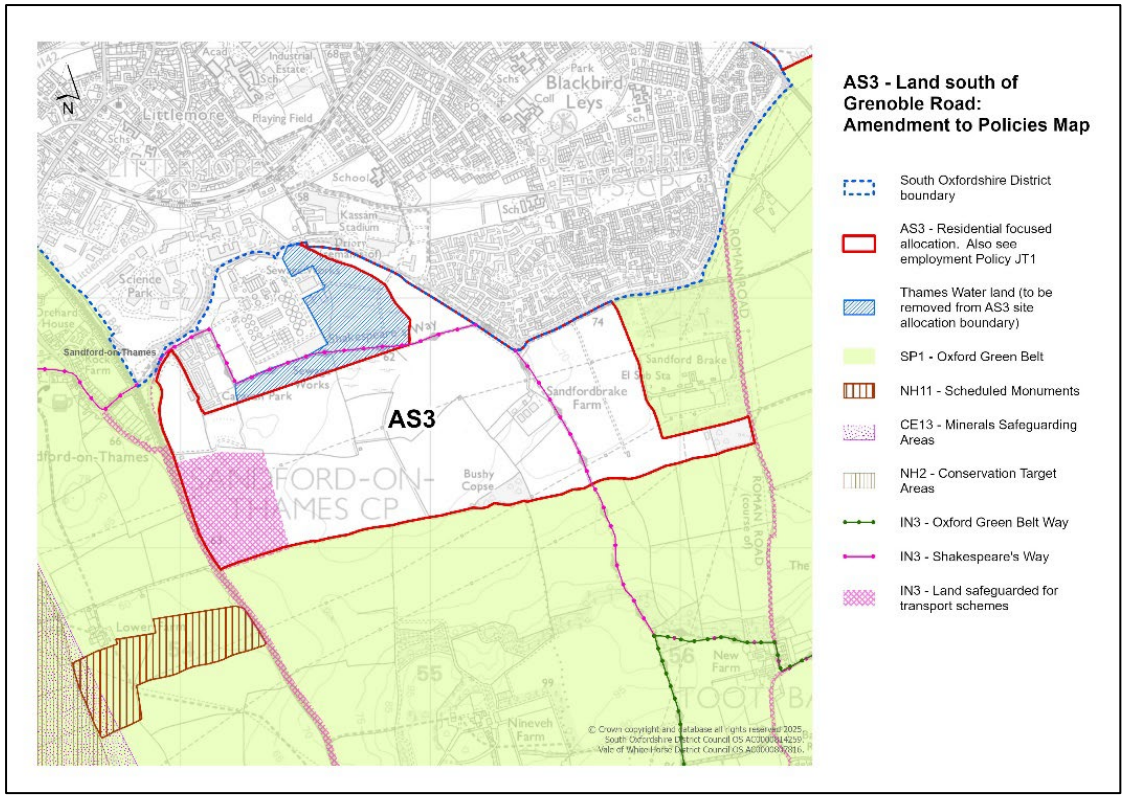
In their Regulation 19 representation the EA suggested further additions to part 2(k) related to site-specific flood risk assessments. However, we do not consider this is a soundness concern as requirements for site specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.

- For information, as stated in our SOCGs with Thames Water (examination library reference LPA22) and the site promoter (examination library reference LPA51), we will make a modification to the policies map and indicative concept plan for this site, to reflect the removal of Thames Water's land from the allocation. This was requested by Thames Water, as landowner, in their Regulation 19 representation and we agree with this modification. No policy wording amendments are needed in relation to this change. An amended indicative concept plan and amended policies map extract are set out below:

[Amended Indicative Concept Plan]



[Amended Policies Map for AS3]


AS3 - Land south of Grenoble Road: Amendment to Policies Map
South Oxfordshire District boundary
AS3 - Residential focused allocation. Also see employment Policy JT1
Thames Water land (to be removed from AS3 site allocation boundary)
SP1 - Oxford Green Belt
NH11 - Scheduled Monuments
CE13 - Minerals Safeguarding Areas
NH2 - Conservation Target Areas
IN3 - Oxford Green Belt Way
IN3 - Shakespeare's Way
IN3 - Land safeguarded for transport schemes
AS3
N
Littlemore
Blackbird Leys
Sandford-on-Thames
Sandfordbrake Farm
Busby Copse
Nineveh Farm
New Farm
ROMAN ROAD

Policy AS4 – Land at Northfield

Q7.2.1 (AS4) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Land adjacent at Northfield (examination library reference LPA52, section 2, page 2) details the background to the site allocation.

The allocation was subject to detailed examination with the outcomes recorded in the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector concluded that the strategic site selection process undertaken by SODC provided a sound basis for identifying strategic growth locations within the district (paragraphs 58-69 and 91-94). The Inspector also considered Northfield specifically and concluded that the allocation represented an appropriate and sustainable location for strategic growth, capable of delivering significant housing (paragraphs 152-162).

Northfield was consequently allocated in the South Oxfordshire Local Plan 2035 (examination library reference ALP01), which released it from the Green Belt via Policy STRAT 12 (Land at Northfield). This was to deliver approximately 1,800 new homes and supporting services and facilities.

The site at Northfield is located on the edge of Oxford City's administrative boundary. Northfield is well located for access to employment and services within walking and cycling distance, and the B480 is an existing public transport corridor. The site has excellent opportunities to provide improved transport links.

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 36-37 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it. The preferred option was to retain the current allocation, subject to presentational changes of the existing criteria / requirements for this site; and the allocation was 'recommended to be retained in the Joint Local Plan'.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Q7.2.2 (AS4) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when it was first allocated for development. Please see the Inspector's report (examination library reference LPA101) paragraphs 152-162. That plan was adopted by SODC in December 2020. There has been no change in circumstances that have caused a need for a revision to the boundary or capacity assumptions.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4–7.2.7, 7.2.10 and 7.2.13.

As stated in paragraph 2.7 of the Statement of Common Ground for this site (examination library reference LPA52), the parties have signed a PPA in relation to the pre-application process, including working towards producing an agreed comprehensive masterplan. It is common ground between us and the promoters (see paragraphs 3.7 and 3.10) that the policy is robust and soundly based and that the site has capacity for approximately 1,800 homes.

The promoter's Regulation 19 representation raised concern that references to an overall site-wide average net density should be restored. We confirmed our position on this in the councils' Response to Key Issues (examination library reference LPA48, page 86, response 6a-c), that this is not a soundness matter. There is agreement with the site promoter that the site has capacity for approximately 1,800 homes (see paragraph 3.22 of the Statement of Common Ground, examination library reference LPA52) and such adding a net-density figure to the policy is not a matter of soundness. Policy AS4 part 2m) also addresses where the delivery of higher density development is to be prioritised and expects graduated density, reducing towards the countryside edges.

The development should also take account of the requirements in Policy DE4 – Optimising Densities, which, for example, states that developments must be informed by local circumstances and site constraints (including landscapes) but also that sites well related to higher tier settlements should be capable of accommodating development at higher densities. The overall average density is a matter for the masterplanning exercise, as part of the planning application.

The promoter's Regulation 19 representation also raised concerns about the need for pitches for Gypsies and Travellers set out in Policy HOU10 (Meeting the Needs of Gypsies, Travellers and Travelling Showpeople), asking for removal of this requirement. Our position is that the Northfield site is a suitable and sustainable location to meet some of this need (6-10 pitches). This is a large allocation with capacity to accommodate a range of residential uses, including pitch provision**,** as recognised in paragraph 4.53 of the Housing Requirement, Affordable Housing, and Gypsies, Traveller, and Travelling Show People Topic Paper (examination library reference TOP03.2).

Q7.2.3 (AS4) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses – these are primarily a range of residential uses (including older persons accommodation and Gypsy and Traveller pitches) and supporting services and facilities.

The South Oxfordshire Local Plan 2035 (examination library reference ALP01) established the main residential number of approximately 1,800 units. Please see our response to Q7.2.1 for the background to this use and its reassessment.

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 60 units on this site.

The requirement for Gypsy and Traveller pitch provision (6-10 pitches for this site), has been addressed through the 'Housing Requirement, Affordable Housing, and Gypsies, Travellers, and Travelling Show People Topic Paper' (examination library reference TOP03.2, paragraphs 4.33–4.54).

Q7.2.4 (AS4) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS4, together with the relevant plan-wide policies, are appropriate to address the potential adverse impacts arising from development at Land at Northfield.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS4 assessment, pages 15-17). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS4 and the relevant plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to Key Issues, (examination library reference LPA48, pages 83-86). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport/traffic

Some respondents raised concerns about potential adverse impacts relating to requirements for bus service improvements to nearly villages. Any future bus routes relating to the site will be considered through the planning application for the site and are not considered a soundness issue. The transport implications of the allocation have been considered through our transport evidence base. The Transport Modelling Report (examination library reference ITV03) undertaken for the Joint Local Plan assesses the cumulative traffic impacts of the proposed growth and has informed the mitigation requirements for the site allocations. The modelling was undertaken by AtkinsRéalis, led by Oxfordshire County Council, which considers the work to be robust and proportionate for plan-making purposes.

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.5.1–3.5.4) identifies existing active travel opportunities at Northfield, including connections towards Little Milton and Stadhampton through the Strategic Active Travel Network, the Oxford Green Belt Way around the allocation, and direct connections towards southern Oxford via existing provision on Oxford Road and Watlington Road. It also identifies a missing connection to the north-east for the Oxford Green Belt Way. These findings informed the requirement of Policy AS4 for new and enhanced public rights of way, including a connection and improvements to the Oxford Green Belt Way to and from the north-east of the site.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS4 assessment, pages 15-17) identifies minor positive effects overall in relation to sustainable travel. This reflects the site's moderate accessibility to the bus

network, several Public Rights of Way and National Cycle Route #57, as well as to proposed walking and cycling infrastructure.

Policy AS4 provides for mitigation through high-quality walking and cycling infrastructure, improvements to bus services, and off-site infrastructure for bus routes. Transport Assessment at application stage will establish the precise form and timing of necessary mitigation.

Overall, we consider that the transport effects of the allocation have been assessed at an appropriate level for plan-making and that the policy safeguards provide an effective framework for mitigation. This approach is consistent with the wider transport evidence, which identifies the site policies and the Infrastructure Delivery Plan (examination library reference CDS05.1) as the mechanisms for establishing the necessary highway and sustainable transport infrastructure, with detailed matters to follow through the development process. Please also see our response to Question 7.2.6 regarding the effects on the highway network.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS4 assessment, pages 15-17) identifies negligible adverse effects in relation to pollution at Land at Northfield, particularly during the construction phase when noise and air pollution could potentially affect nearby residents. Watlington Road (B480) runs along the western boundary of the site which could serve as a noise and air pollution source for new residents in the western portion of the site. The site is also immediately adjacent to the Oxford City AQMA, so new residents could be exposed to areas of poor air quality. The site falls within dark skies zone E3 (suburban medium district brightness zone), therefore the risk of light pollution effects is considered to be low.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and plan-wide policy requirements.

Nature conservation and biodiversity

The Environment Agency's representation highlighted that development for the site should introduce appropriate ecological buffer zones and protective measures for the river and its corridor.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS4 assessment, pages 15 -17) identifies neutral effects on biodiversity, noting that boundary hedgerows and small pockets of woodland supporting protected/ notable species could potentially be impacted by construction works. There are no formal ecological designations in and around the site.

Policy AS4 responds through a landscape-led approach, substantial green infrastructure and biodiversity net gain, supported by the plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1-3.8 and 5.1).

Additionally, regarding nature conservation, Natural England's representation highlighted that sites AS3 and AS4 have the potential to result in increased visitor pressure and recreational disturbance to a number of Sites of Special Scientific Interest around Oxford, and advised that the provision of 3 hectares of accessible open green space per 1,000 population should be delivered on-site at these locations, with the requirement added to the policy itself. We consider this addressed via Policy HP7 - Open Space on New Developments, which does require the provision of the amount of accessible open space requested. As the plan is to be read as a whole, Policy HP7 would apply to this site.

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

One respondent requested requirements ensuring the site's orientation and layout have regard for the surrounding site features, including the need for a buffer to the north western boundary. The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS4 assessment, pages 15 -17) identifies a neutral effect in relation to landscape, given that the site lies more than 2km from any National Landscape. The extent of any more localised landscape and visual effects will be dependent on the scale, layout and massing of the development coming forward.

Policy AS4 follows a landscape-led approach, requiring substantial green infrastructure, retention and enhancement of landscape features, and a design that responds to topography and visual context. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that the policies of the plan provide an appropriate framework to mitigate any potential landscape effects.

Flood Risk and Water Management

Some respondents raised concerns about potential adverse impacts relating to flood risk, water quality and wastewater infrastructure. Representations, including from the Environment Agency, related to the capacity at the Oxford Sewage Treatment Works and a need for SFRA recommendations to be included in the policy. Oxfordshire County Council suggested an amendment to the policy for clarity that a flood risk assessment is required. We responded to these concerns in the councils' Response to Key Issues, regarding Regulation 19 representations (examination library reference LPA48, pages 79-80).

The updated flood-risk evidence identifies areas of fluvial and surface water flood risk within the allocation, together with a potential groundwater flood-risk pathway. The Level 1 Strategic Flood Risk Assessment Addendum (examination library LPA44, Appendix B) identifies that groundwater may emerge at significant rates and has the capacity to flow overland or pond within topographic low points. It identifies the need for built development to avoid the functional floodplain and for groundwater risk to be investigated further at Flood Risk Assessment stage.

The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS4 site assessment) provides the more detailed site-specific assessment. It concludes that the site could be allocated if development avoids the functional floodplain and the significant surface water flow path along the eastern boundary. The assessment identifies mitigation through the use of the functional floodplain as a blue-green corridor, a detailed drainage strategy and further investigation of groundwater conditions through the site-specific Flood Risk Assessment. The Level 2

assessment also identifies the need for further modelling of the effects of climate change on fluvial and surface water flood risk, together with investigation of the condition of the culvert beneath the B480 and the consequences of a potential blockage. These are detailed matters that can appropriately be addressed through the site-specific Flood Risk Assessment and drainage strategy as development comes forward.

Wastewater from Policy AS4 would drain to Oxford Sewage Treatment Works. The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.7) identifies that Oxford Sewage Treatment Works faces infrastructure-capacity issues and that additional flows could present an environmental risk. However, it also identifies a programme of upgrades. Thames Water's Phase 1 works are expected to increase inlet capacity, and the Environment Agency has confirmed that it is satisfied that the Phase 1 works will enable planned development to be accommodated without deterioration in water quality once delivered. The Water Cycle Study further explains that the majority of Joint Local Plan allocations draining to Oxford Sewage Treatment Works are not expected to begin delivering homes until around 2030 and that, provided the current upgrade works are delivered as planned, there should be sufficient capacity to accommodate the Joint Local Plan allocations.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the proposed modification to Policy AS4 addresses the Environment Agency's soundness concern and that there are no outstanding flood-risk soundness concerns relating to the allocation. The Environment Agency agrees that the site is largely within Flood Zone 1 and confirms that there is no reason to believe the development is undeliverable, subject to detailed modelling of the Northfield and Littlemore Brooks and the drainage ditches on the site as recommended by the Strategic Flood Risk Assessment.

Policy AS4 requires development to respond appropriately to the identified flood-risk constraints, alongside the requirements of the plan-wide flood-risk and water-management policies, including Policy CE6 (Flood risk) and Policy CE8 (Water quality, wastewater infrastructure and drainage). The wider policy framework also provides for necessary infrastructure and mitigation to be secured as proposals progress through masterplanning and the planning application process. We therefore consider that the flood-risk and water-management effects of the allocation have been appropriately assessed and that the identified risks do not prevent the allocation from being developed. The evidence provides a clear framework for locating development away from the areas at greatest risk, managing surface water and groundwater risk through detailed drainage design, and aligning development with the necessary wastewater infrastructure improvements.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS4 assessment, pages 15-17) identifies a neutral effect in relation to the historic environment for Land at Northfield. The site is located more than 500m from any nationally designated heritage assets, more than 100m from any locally designated assets, and more than 300m from a conservation area.

The site-specific heritage evidence is provided by the Heritage Impact Assessment prepared for the South Oxfordshire Local Plan strategic sites (examination library reference NHL02, section 4.6 pages 221-254).

To mitigate any potential impacts, Policy AS4 requires a site layout and form that respects and conserves the setting of heritage assets within and beyond the site through sensitive planting and Policy NH8 – The historic environment also has provisions regarding conserving and enhancing heritage assets.

Taken together, Policy AS4, the relevant plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS4) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village , the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this

process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is required to pass the Exception Test as it is proposed for a more vulnerable use (housing) and that a very small part of the site is located in Flood Zone 3a, albeit no housing is proposed in that part.

Q7.2.6 (AS4) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation

align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in OCC's Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS4) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS4 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Land at Northfield. A comprehensive list of the infrastructure requirements is provided in Section 5 of the IDP (pages 17-18), with detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing set out in Appendix 2.4: Infrastructure Requirements for Land at Northfield (Policy AS4).

Policy IN1 (Infrastructure and Service Provision), states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the IDP.

Policy AS4 highlights the main infrastructure requirements of this site:

- Part 2(e) and (h) require the provision of convenience floorspace and a new library on site or contributions towards library provision in the area;
- Part 2(f) requires sufficient education capacity, including a new on-site primary school, as well as contributions to appropriate off site secondary school and SEND provision;
- Part 2(d) requires the delivery of leisure provision, including delivery of a community hall, football pitches, and a MUGA;
- Part 2(g) requires all necessary transport infrastructure and mitigation measures to support the development;

- Part 2(i), 2(j), 2(l) and 2(m) require strategic landscaping, green infrastructure provision and biodiversity enhancements across the site.

Additionally, Policy LS1 (Proposals for large scale major development), which is applicable to Land South of Grenoble Road, requires in part 1e that development proposals must ensure that necessary supporting infrastructure is provided, including social and community infrastructure. Developers must engage with relevant infrastructure providers to ensure the implementation of the Infrastructure Development Plan. Together with the other requirements of Policy AS4, these provisions provide the framework for securing the infrastructure identified in the IDP.

The physical constraints relating to the allocation are: the need to provide sufficient infrastructure capacity to support growth; environmental considerations relating to the adjacent Oxford Green Belt and landscape east of the site, flood risk and biodiversity; and the line of electricity pylons running across the south-eastern edge of the site. These matters are addressed through the requirements of Policy AS4 and where necessary on the indicative concept plan, and will be considered further through the comprehensive masterplan required by part 2(a).

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan will ensure that infrastructure provision and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policies IN1, AS4 and LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process, having regard to the latest available evidence.

Q7.2.8 (AS4) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Land at Northfield (examination library reference LPA52). Paragraph 2.7 confirms that the land is in control of only two landowners - Brasenose College and Oxfordshire County Council's Estates Assets and Investment Department. Catesby Estates act on behalf of Brasenose College to promote the allocation in a coordinated and master planned approach. The County Council as landowner own

15.55 hectares (22.9%), with the remaining balance of 52.26 hectares being in the control of Brasenose College (77.1%). Both landowners are working together to ensure the optimum outcome for the site that delivers development in accordance with the allocation. Paragraph 3.2 confirms that the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

There is clear evidence of promoter interest in bringing the site forward. Both landowners are working together to ensure the optimum outcome for the site that delivers development in accordance with the allocation. The parties are jointly progressing a single outline planning application to cover the site. The parties have signed a Planning Performance Agreement between L&Q Estates (now Catesby Estates) on behalf of Brasenose College, Oxfordshire County Council Estates, South Oxfordshire District Council, Oxfordshire County Council (in respect of all other County Council interests other than the Estates interests) and Oxford City Council in relation to the pre-application process, including working towards producing an agreed comprehensive masterplan.

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would prevent the allocation from coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS4) How is it intended to bring the site forward for development?

Councils' Response

The Statement of Common Ground for Land at Northfield (examination library reference LPA52) confirms in paragraphs 2.8-2.9 that preparatory work has already been undertaken to support the development of the site. This includes public and stakeholder engagement, quarterly meetings with representatives from local parish councils and local residents, and pre-application discussions with the councils' and Oxfordshire County Council.

The Statement of Common Ground further confirms that the parties are committed to ongoing partnership working to support delivery of the allocation and that the site is sustainable, suitable, available and developable (paragraphs 2.10 and 3.1).

We are therefore satisfied that active work is underway to progress the site and that there is a clear route to the submission of a planning application and subsequent delivery of the allocation.

Q7.2.10 (AS4) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

Yes, the development proposed under Policy AS4, including the mix of uses on the site, is viable and deliverable over the plan period.

The Viability Report (examination library reference ITV04) determined that this site was viable. Based on a Benchmark Land Value of £480,000 per net acre, the scheme generated a Residual Land Value of £481,121 per net acre (Table 9.3, p104), resulting in a low viability surplus of circa £1,121.

Although viable, the site received an amber RAG rating for deliverability. Although the site had been previously assessed, little new work had been undertaken by the promoters. They also raised concerns around the potential costs of HIF transport contributions. However, the site is being actively promoted by an experienced consultant team. On this basis, the strategic site was broadly considered viable and deliverable.

Stantec for Catesby Estates and Brasenose College have suggested that in light of the viability position (relatively modest surplus), additional sensitivity testing should be undertaken to consider the impact of cost increases. The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a viability surplus of £1,121 per net acre, as concluded in the original report (examination library reference ITV04, Table 9.2).

				Build Costs	105 = 5% increase			
Balance (RLV - BLV £ per acre (n))	1,121	55%	70%	85%	100%	115%	130%	145%
	90%	1,047,916	596,310	144,704	(307,884)	(815,798)	(1,766,642)	(5,905,276)
	92%	1,109,521	657,915	206,309	(245,937)	(741,497)	(1,313,940)	(5,241,428)
Market Values	94%	1,171,126	719,520	267,913	(184,076)	(667,815)	(1,230,315)	(4,577,581)
100%	96%	1,232,731	781,124	329,518	(122,269)	(594,588)	(1,147,682)	(3,913,733)
(105% = 5% increase)	98%	1,294,335	842,729	391,123	(60,568)	(521,675)	(1,068,299)	(3,249,886)
	100%	1,355,940	904,334	452,728	1,121	(453,253)	(991,076)	(2,586,038)
	102%	1,417,545	965,939	514,332	62,726	(390,955)	(915,250)	(1,922,190)
	104%	1,479,150	1,027,543	575,937	124,331	(328,793)	(840,379)	(1,416,673)
	106%	1,540,754	1,089,148	637,542	185,936	(266,740)	(766,210)	(1,333,047)
	108%	1,602,359	1,150,753	699,147	247,540	(204,810)	(692,536)	(1,249,866)
	110%	1,663,964	1,212,358	760,751	309,145	(142,940)	(619,285)	(1,169,601)
	112%	1,725,569	1,273,962	822,356	370,750	(81,132)	(546,316)	(1,091,601)
	114%	1,787,173	1,335,567	883,961	432,355	(19,397)	(474,366)	(1,015,105)
	116%	1,848,778	1,397,172	945,566	493,959	42,303	(411,996)	(939,675)
	118%	1,910,383	1,458,777	1,007,170	555,564	103,958	(349,768)	(865,009)
	120%	1,971,987	1,520,381	1,068,775	617,169	165,562	(287,649)	(790,922)
	122%	2,033,592	1,581,986	1,130,380	678,773	227,167	(225,607)	(717,261)
	124%	2,095,197	1,643,591	1,191,984	740,378	288,772	(163,682)	(643,983)
	126%	2,156,802	1,705,195	1,253,589	801,983	350,377	(101,803)	(570,972)
	128%	2,218,406	1,766,800	1,315,194	863,588	411,981	(39,996)	(498,186)
	130%	2,280,011	1,828,405	1,376,799	925,192	473,586	21,774	(433,083)

This table demonstrates that the scheme is finely balanced in terms of viability – a 2% decrease in sales values would render the scheme unviable. Were costs to increase by 30%, then the market sales values would have to improve by 30% to

return to viability. Although house prices have seen little growth since the study was undertaken and build costs have been volatile, we would not expect this to sustain over the plan period. We also draw attention to the fact that the viability modelling included no house price growth or placemaking premiums. Research shows that value premiums are relatively common for strategic sites with significant investment in infrastructure. It is also noted that no growth is included in the viability modelling – over the delivery timescales, sales growth could significantly improve the viability conclusions.

On this basis, we consider that the allocation will be viable and deliverable over the plan period.

With regard to wider representations made in relation to the site, concerns are raised around the cumulative impact of the plan policies alongside the requirements for Net Zero Carbon. The costs included in the viability assessment for net zero carbon buildings are based on robust evidence prepared by Bioregional and Currie and Brown (examination library reference ITV04, page 59). The costs associated with BNG were taken from a research study prepared for the councils' (page 58). We therefore consider that the costs of achieving these policies are sufficiently evidenced and suitably accounted for in the viability assessment. The Viability Report explains how the cumulative impact of emerging policies is dealt with (page 20). A comprehensive policies matrix was used to determine the policies with a direct impact on viability and to ensure that costs were allowed for in the modelling.

Taking these considerations into account, we remain of the opinion that the development proposed at Land at Northfield, including the mix of uses on the site, is viable and deliverable over the plan period.

Q7.2.11 (AS4) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Land at Northfield.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS4 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan and the Joint Design Guide (examination library reference DBE01). The masterplan is to be prepared collaboratively with South Oxfordshire District Council and in consultation with Oxfordshire County Council, submitted with the first planning application, and used to guide subsequent proposals. This provides the principal mechanism for coordinating the distribution of uses, movement, green infrastructure, connections, integration with surroundings and the sequencing of development.

The Statement of Common Ground (examination library reference LPA52, paragraph 3.12) records agreement that the general site requirements identified in Policy LS1 and the site-specific requirements set out in Policy AS4 identify the key requirements for this site to deliver.

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for Land at Northfield are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 17-18) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS4) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the expected timescale and rate of development are realistic.

Firstly, it should be noted that there is no delivery proforma for the site within Appendix F of the Housing Land Supply Statement ((examination library reference LPA97). This is because at the time of publishing we were awaiting a response on the questions asked by Catesby Estates, the land promoter. We are still awaiting this response. However, the trajectory anticipates the first homes coming forward in 2032/33, as agreed in the Statement of Common Ground signed in March 2026 ((examination library reference LPA52). This is broadly in accordance with our site average lead-in times for sites of this size, set out in Appendix D of (examination library reference LPA97), which indicates a 6.4-year lead in time from the submission of an application to first completions.

We currently anticipate an application being submitted in early 2027, which is based on discussions with the case officer and the agents for the site promoter, which have

indicated an application is close to submission. This would indicate first completions coming forward from the start of the 2033/34 monitoring year. However, we are aware of a significant amount of design work that has been undertaken for this site, which has been informed by an independent Design Review Panel process. This demonstrates that the planning permission process is likely to be shorter than average. We consider that the site is in a suitable location for housing development, as demonstrated by its allocation, it is available, viable and there is a reasonable prospect it will be developed at the point envisaged.

The build out rate is based upon the average build-out rate for sites of this size in the district and is therefore a reasonable assumption.

Q7.2.13 (AS4) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q7.2.2, Q7.2.3, Q7.2.4 and Q7.2.10 above, and explain why we consider the plan is sound or that a main modification is needed (see Q7.2.15).

Q7.2.14 (AS4) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording 'in accordance with' appears in the policies of the adopted South Oxfordshire Local Plan 2035 (examination library reference ALP01), however upon reflection we consider a modification to replace 'in accordance with' with 'having regard to' would be justified, in respect of Policy AS4 part 2 d).

[Proposed modification] Policy AS4, part 2 (d)

> d) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan, including delivery of a community hall, football pitches, and a MUGA;

Q7.2.15 (AS4) Are any modifications necessary in the interests of soundness?

Councils' Response:

Yes, we would like to make modifications to this policy in the interests of soundness as follows:

- See our response to Q7.2.14, in respect of one modification.
- We would like to propose a main modification to the policy text at part 2(k), as set out and agreed in our Statement of Common Ground with the Environment Agency (examination library reference LPA67, page 13). This is to ensure alignment with national policy. The proposed modification is set out below:

[Proposed modification] Policy AS4, part 2 (k)

k) that there is no built development in Flood Zones 2 and 3 **or the design flood extent (1% AEP plus an appropriate allowance for climate change),** other than essential **infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) -** and green infrastructure **that has been demonstrated to not increase flood risk elsewhere**

In their Regulation 19 representation the EA suggested further additions to part 2(k) related to site-specific flood risk assessments. However, we do not consider this is a soundness concern as requirements for site specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.

Policy AS5 – Land at Bayswater Brook

Q7.2.1 (AS5) What is the background to the site allocation? How was it identified and which options were considered?

The Statement of Common Ground for Land at Bayswater Brook (examination library reference LPA53, section 2, page 2) details the background to the site allocation. The allocation was subject to detailed examination with the outcomes recorded in the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector concluded that the strategic site selection process undertaken by South Oxfordshire District Council provided a sound basis for identifying strategic growth locations within the district (paragraphs 58-69 and 91-94). The Inspector also considered the site specifically and concluded that the allocation represented an appropriate location for strategic growth, capable of delivering significant housing (paragraphs 163-174).

'Land North of Bayswater Brook' was consequently allocated in the South Oxfordshire Local Plan 2035 (examination library reference ALP01), which released it from the Green Belt via Policy STRAT 13 - Land North of Bayswater Brook. This was to deliver approximately 1,100 new homes and supporting services and facilities. This allocation included a separate parcel of land, known as 'Sandhills', not allocated in the Joint Local Plan.

The site at Land at Bayswater Brook is located on the edge of Oxford City's administrative boundary. Its proximity to major employment locations and a wide range of services and facilities means that there is much potential to support travel by walking and cycling; and it is well positioned to connect with public transport provision in Oxford City. The adjoining area of Barton is a priority regeneration area for Oxford City and development at Land at Bayswater Brook has potential to support regeneration aspirations for Barton.

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 36-37 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it. The preferred option was to de-allocate the Sandhills element of the site (please see

TOP07.1 page 40 for further details) but retain the rest of the allocation subject to presentational changes of the existing criteria / requirements. The allocation was 'recommended to be retained in the Joint Local Plan' and the parcel of land north of Sandhills was 'is not recommended to be retained in the Joint Local Plan'.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Land at Bayswater Brook has now received outline planning permission, including Listed Building consent, as follows:

- South Oxfordshire's Planning Committee resolved to grant outline planning consent (P22/S4618/O[8]) in November 2024 (for 1,450 dwellings and 120 assisted living homes, equivalent to 63 dwellings - totalling 1,513 dwellings); and outline permission was granted on 18 November 2025.
- A Full Application for infrastructure works (P22/S4596/FUL[9]) was approved on 9 December 2024.
- Listed Building consent (P22/S4550/LB[10]) was also given on 18 November 2025 for 'Refurbishment works to the Main Barn and three curtilage barns and refurbishment works to the Wick Farm Well House building'.

Our Housing Land Supply Statement for South Oxfordshire (examination library reference LPA97) states that the promoter has confirmed they intend to submit applications to discharge pre-commencement conditions by the end of 2026. The first reserved matters applications are anticipated in mid-2027.

The separate Sandhills element of the original site allocated in the South Oxfordshire Local Plan 2035 (examination library reference ALP01) has also been granted planning permission (at appeal - application P24/S2074/O[11]) for up to 76 dwellings and a care home, including open space and green infrastructure.

Q7.2.2 (AS5) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

[8] Planning Application P22/S4618/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4618%2FO
[9] Planning Application P22/S4596/FUL, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4596%2FFUL
[10] Planning Application P22/S4550/LB, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4550%2FLB
[11] Planning Application P24/S2074/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P24/S2074/O

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when it was first allocated for development. Please see the Inspector's report (examination library reference LPA101) paragraphs 163-174.

That plan was adopted by SODC in December 2020. However, as highlighted in response 7.2.1 for this site, the site allocation now has planning permission (for 1,450 dwellings and 120 assisted living homes, equivalent to 63 dwellings - totalling 1,513 dwellings). The site promoter's Regulation 19 representation also suggested the site should have a higher development quantum. Given the planning application and evaluation stage has now thoroughly investigated the site capacity assumptions and proposals, we would like to propose a modification to the dwelling numbers from 1,100 to 1,450 dwellings and 120 units of housing with care for older people, equivalent to 63 dwellings - totalling 1,513 dwellings (see our response to 7.2.15 for further detail).

There has also been a change in circumstances since the adoption of the South Oxfordshire Local Plan 2035 (examination library reference ALP01), that caused a need for a revision to the boundary to the site in the Joint Local Plan (removal of a parcel of land north of Sandhills). Our response to 7.2.1 details this.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

It is common ground between us and the promoters (see the Statement of Common Ground, examination library reference LPA53, paragraphs 3.8 and 3.9) that the allocation is robust and soundly based - and at the point of time the SOCG was signed (May 2025) it was agreed that 'at least 1,100 dwellings can be delivered within the AS5 site allocation boundary'.

Q7.2.3 (AS5) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses – these are primarily a range of residential uses (including older persons accommodation) and supporting services and facilities.

The South Oxfordshire Local Plan 2035 (examination library reference ALP01) established the main residential number of approximately 1,100 units. Please see our response to Q7.2.1 for the background to these uses and their reassessment. The mix of uses on the site has been informed by the evidence supporting the Plan on needs, such as the Joint Housing Needs Assessment, as well as engagement with service providers, such as Oxfordshire County Council.

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 120 units on this site.

Q7.2.4 (AS5) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS5, together with the relevant plan-wide policies, are appropriate to address the potential adverse impacts arising from development at Land at Bayswater Brook.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS5 assessment, pages 18-21). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS5 and the relevant plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to Key Issues, (examination library reference LPA48, pages 83-86). However, Land at Bayswater Brook has now received outline planning permission, through which it has been demonstrated that adverse impacts have been satisfactorily mitigated. Please see our response to Q7.2.1 for more details regarding this.

Q7.2.5 (AS5) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our

site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that outline planning permission was granted on 18 November 2025. Through the planning application process, it was demonstrated that the Exception Test was passed.

Q7.2.6 (AS5) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required

improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF.

Any future applications will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in Oxfordshire County Council's Strategic Planning Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS5) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

The infrastructure requirements, costs, delivery arrangements and phasing for this site (which has been granted planning permission) have been determined through the development management process, informed by the IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme depends on the detailed proposals for the site and infrastructure capacity at the time development comes forward.

Policy AS5 highlights the main infrastructure requirements of this site:

- Part 2(d) and (e) require provision of health care capacity / contributions; convenience floorspace

- Part 2(c) requires sufficient education capacity, including a new on-site primary school and contributions towards off-site secondary school and SEND provision;
- Part 2(f) requires the delivery of leisure provision, including delivery of a community hall, bike track, learn to cycle track, outdoor gym, MUGA and tennis courts;
- Part 2(g) requires all necessary transport infrastructure and mitigation measures to support the development;
- Part 2(q) and 2(r) require green infrastructure provision and biodiversity enhancements across the site.

The physical constraints relating to the allocation are:

- environmental considerations relating to the adjacent Oxford Green Belt, flood risk and biodiversity (for example: Sidlings Copse and College Pond SSSI and Wick Copse Ancient Woodland are located directly to the north of the site; and Bayswater Brook, which runs along the south of the site, is designated as a Site of Local Importance to Nature Conservation);
- a designated Oxford view cone, lying directly to the west of the site;
- Headington Wick Roman Villa is adjacent to the site.

These matters are addressed through the requirements of Policy AS5 and have also been considered through the recent planning permission process.

Policy IN1 (Infrastructure and Service Provision), states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the Infrastructure Delivery Plan.

We are therefore satisfied that the infrastructure requirements and associated constraints have been appropriately addressed through the requirements of Policies IN1, AS5 and LS1, and the precise infrastructure package, costs and phasing has been agreed through the development management process, having regard to the latest available evidence.

Q7.2.8 (AS5) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Land at Bayswater Brook (examination library reference LPA53).

Paragraph 2.8 confirms that the site is in single landownership, and paragraph 3.1 confirms that it is not subject to any insurmountable environmental, legal, ownership, or technical constraints that would otherwise impede development.

As stated in our responses above, the site has planning permission and there is clear evidence of developer and promoter interest in bringing the site forward. Our latest five-year housing land supply statement (examination library reference LPA97, pages 88-91) states that the applicant 'has shown consistent determination and progress to move this site through the planning process' and includes the site within the anticipated housing supply trajectory, confirming our expectation that it will contribute towards housing delivery during the plan period.

We are therefore satisfied that together with the site's planning permission being granted, there is a clear landownership position, and no issues that would prevent the allocation from being capable of coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS5) How is it intended to bring the site forward for development?

Councils' Response:

Now that outline planning permission has been granted, the site promoter advises, through the latest five-year housing land supply statement (examination library reference LPA97, pages 77-80), that they intend to submit applications to discharge pre-commencement conditions by the end of 2026.

Reserved matters applications are expected to be submitted following the discharge of the design code condition, with the first reserved matters applications anticipated to be in mid-2027. Our latest trajectory for this site forecasts first completions on site in 2028/29 with the prospect of homes being delivered in the 5-year period.

The Statement of Common Ground further confirms that the parties are 'committed to partnership working' to support delivery of the allocation and that the site is 'sustainable, suitable, available and developable' (paragraphs 2.14 and 3.1).

We are therefore satisfied that active work is underway to progress the site, in working towards reserved matters applications, and that there is a clear route to delivery of the allocation within the 5-year period.

Q7.2.10 (AS5) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

Yes, the development proposed under Policy AS5, including the mix of uses on the site, is viable and deliverable over the plan period.

The Viability Report (examination library reference ITV04) determined that this site was viable. Based on a Benchmark Land Value of £350,000 per net acre, the scheme generated a Residual Land Value of £410,808 per net acre (Table 9.3, page 104), resulting in a modest viability surplus of circa £60,808 per net acre.

As part of the Viability Report, the site also achieved a Green RAG rating for deliverability. This took into account the fact that the site achieved a viability surplus, the promoter provided cost evidence based on their masterplan and offered transparency on their minimum land value.

In terms of viability across the plan period, the following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a viability surplus of £60,808, as concluded in the original report (examination library reference ITV04,Table 9.2):

				Build Costs	105 = 5% increase			
Balance (RLV - BLV £ per acre (n))	60,808	55%	70%	85%	100%	115%	130%	145%
	80%	442,700	210,231	(23,094)	(258,709)	(531,591)	(1,362,177)	(3,488,720)
	82%	474,329	241,896	8,700	(226,495)	(490,015)	(1,025,262)	(3,151,805)
Market Values	84%	505,959	273,560	40,457	(194,378)	(449,936)	(761,341)	(2,814,891)
100%	86%	537,588	305,224	72,211	(162,334)	(410,744)	(717,701)	(2,477,976)
(105% = 5% increase)	88%	569,218	336,888	103,953	(130,346)	(372,126)	(674,425)	(2,141,062)
	90%	600,848	368,553	135,672	(98,402)	(336,048)	(631,492)	(1,804,148)
	92%	632,477	400,204	167,391	(66,511)	(303,415)	(588,787)	(1,467,233)
	94%	664,107	431,849	199,109	(34,642)	(270,963)	(546,225)	(1,130,319)
	96%	695,737	463,493	230,800	(2,803)	(238,636)	(504,928)	(819,070)
	98%	727,366	495,138	262,489	29,014	(206,420)	(464,862)	(775,347)
	100%	758,996	526,782	294,178	60,808	(174,287)	(425,588)	(731,954)
	102%	790,626	558,427	325,867	92,599	(142,217)	(386,853)	(688,871)
	104%	822,255	590,071	357,552	124,353	(110,212)	(348,629)	(645,983)
	106%	853,878	621,716	389,216	156,107	(78,250)	(315,859)	(603,372)
	108%	885,498	653,360	420,880	187,860	(46,314)	(283,301)	(560,950)
	110%	917,117	685,000	452,545	219,580	(14,425)	(250,877)	(519,841)
	112%	948,737	716,630	484,209	251,299	17,448	(218,564)	(479,788)
	114%	980,357	748,259	515,873	283,018	49,287	(186,346)	(440,453)
	116%	1,011,977	779,889	547,537	314,737	81,123	(154,204)	(401,612)
	118%	1,043,596	811,519	579,200	346,430	112,917	(122,126)	(363,144)
	120%	1,075,216	843,148	610,845	378,119	144,710	(90,096)	(328,359)

This table demonstrates that the scheme could sustain a reduction in market sales values of circa 2%. Should cost inflation of 15% be experienced, then values would have to increase by circa 12% to restore viability. Costs have experienced volatility since the work was undertaken and values have broadly plateaued. However, it is recognised that these circumstances are unlikely to persist throughout the plan period. Notably, the baseline assumptions do not take into account any value growth or placemaking premiums, which may reasonably be expected for larger strategic sites.

Pegasus Group for Dorchester Residential Management and Christ Church, Oxford suggest that the 20% BNG target has uncertain costs which are difficult to capture in whole-plan viability testing and that meeting this target should not come at the expense of delivering affordable housing. The costs associated with BNG were taken from a research study prepared for the councils' (examination library reference ITV04, page 58). We therefore consider that the costs of achieving these policies are sufficiently evidenced and suitably accounted for in the viability assessment.

Concerns were also raised about the impact of the councils' proposed energy standards, recognising that the likely costs of meeting these standards should be factored into any viability assessment. For this reason, robust evidence was prepared by Bioregional and Currie and Brown (examination library reference ITV04, page 59) to assess the cost implications of these policies. These costs have been included in the viability assessment.

Based on these considerations, we remain of the opinion that the development proposed at Land at Bayswater Brook, including the mix of uses on the site, is viable and deliverable over the plan period.

Q7.2.11 (AS5) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Land at Bayswater Brook.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS5 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan and the Joint Design Guide (examination library reference DBE01). A masterplan was submitted with the granted outline planning application (P22/S4618/O[12]) for this site allocation.

[12] Planning Application P22/S4618/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4618%2FO

The Statement of Common Ground (examination library reference LPA53, paragraph 3.7) records agreement that Policy AS5 identifies an appropriate approach to ensuring development is delivered comprehensively.

Infrastructure requirements were secured through the planning application process when the site received planning permission. Infrastructure requirements were identified through the latest Infrastructure Delivery Plan, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers. The S106 for this site was signed on 18 November 2025.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure. However, it should be noted that planning permission for this site was granted following the signing of the S106 in November 2025.

Q7.2.12 (AS5) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the projected timescale and rate of development is realistic, as set out on page 91 of the South Oxfordshire Housing Land Supply Statement (examination library reference LPA97). Page 89-91 of LPA97 set out the conclusions made in respect of the development trajectory of the site, with the key conclusions being:

- The developer has indicated that they expect to commence delivery of homes in 2028/29. Delivery is expected to peak at 200 homes per year from 2032/33.
- We consider the developer's proposed build out rates to be realistic.
- Our assessment is that there is clear evidence there is a realistic prospect of homes being delivered in the 5-year period.

Q7.2.13 (AS5) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q7.2.2, Q7.2.3, Q7.2.4 and Q7.2.10 above, and explain why we consider the plan is sound or that a main modification is needed (see Q7.2.15).

Q7.2.14 (AS5) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording 'in accordance with' appears in the policies of the adopted South Oxfordshire Local Plan 2035 (examination library reference ALP01), however upon reflection we consider a modification to replace 'in accordance with' with 'having regard to' would be justified, in respect of Policy AS5 part 2 f).

[Proposed modification] Policy AS5, part 2 (f)

> f) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan, including on site delivery of a community hall, bike track, learn to cycle track, outdoor gym, MUGA and tennis courts;

Q7.2.15 (AS5) Are any modifications necessary in the interests of soundness?

Councils' Response:

Yes, we would like to make modifications to this policy in the interests of soundness as follows:

- See our response to Q7.2.14, in respect of one modification.
- We propose a main modification to part 1 of the policy (and a minor modification to the associated supporting text) to increase the number of homes in the site allocation policy, which now has planning permission, from 1,100 to approximately 1,450 new dwellings (the 120 units of housing with care for older people remains the same). This in light of the fact that the planning application and evaluation stage has now thoroughly investigated the site capacity assumptions and proposals and given permission for 1,450 new dwellings (Class C3) and 120 units of Assisted Living dwellings. This is set out below:

[Proposed modification] Policy AS5, part 1

> 1) Land at Bayswater Brook, Edge of Oxford (as shown on the Policies Map) is allocated to deliver approximately ~~1,100~~ **1,450** new homes, 120 units of housing with care for older people, supporting services and facilities.

[Proposed modification] Policy AS5, Paragraph 8.45

> This site is allocated for the delivery of approximately ~~1,100~~ **1,450** new homes…

- We would like to propose a main modification to the policy text at part 2 (j), as set out and agreed in our Statement of Common Ground with the Environment Agency (examination library reference LPA67, page 13). This is to ensure alignment with national policy. The proposed modification is set out below:

[Proposed modification] Policy AS5, part 2 (j)

j) provision of built development within Flood Zone 1 only, with areas of Flood Zone 2 and 3 **or the design flood extent (1% AEP plus an appropriate allowance for climate change)** preserved as accessible green space **that has been demonstrated to not increase flood risk elsewhere**;

In their Regulation 19 representation the EA suggested further additions to Policy AS5 part 2(j) related to site-specific flood risk assessments. However, we do not consider this is a soundness concern as requirements for site specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.

Policy AS6 – Rich's Sidings and Broadway

Q7.2.1 (AS6) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Rich's Sidings and Broadway (examination library reference LPA54, section 2, page 2) details the background to the site allocation.

The South Oxfordshire Local Plan 2035 allocated the site as part of the Orchard Centre Phase II remaining site in Policy H2: New Housing in Didcot (saved from the South Oxfordshire Core Strategy 2012). As this was part of a larger site and part of a mixed-use allocation to enable the expansion of the Orchard Centre shopping centre, this was to deliver 300 new homes.

The allocation was subject to examination through the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector considered Policy H2: New Housing in Didcot within his analysis of Didcot, and concluded that a 'realistic and reasonable approach' had been presented to development in Didcot, which would allow the town to 'grow substantially and play an important part in the spatial strategy whilst ensuring adequate control over growth, phrasing and infrastructure provision' (paragraphs 178-183).

The extension to the Orchard Centre has been delivered. Therefore, in the Joint Local Plan the site allocation boundary has been reduced and now covers an area of potential regeneration, with the policy recognising the scope for a mix of uses and capacity for approximately 100 homes.

This land is presently used by a wide variety of primarily small businesses mostly engaged in retail and service trades. The existing premises are generally out-dated and of poor-quality design. Those fronting Lower Broadway detract from the eastern part of the town centre. There is, therefore, an opportunity to redevelop the land to improve this key gateway to the town centre.

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 51-54 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it. The preferred option was to 'retain the current allocation, subject to changes to demonstrate design requirements for the site, and to amend the current allocation's boundary and capacity, from 300 to 100'. The allocation was 'recommended to be retained in the Joint Local Plan'.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Q7.2.2 (AS6) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

As highlighted above, regarding the boundary and capacity of the site allocation, the South Oxfordshire Local Plan 2035 (examination library reference ALP01) allocated the site as part of the Orchard Centre Phase II remaining site in Policy H2e: New Housing in Didcot (saved from the South Oxfordshire Core Strategy 2012). As this was part of a larger site and part of a mixed-use allocation (residential/ employment/retail) to enable the expansion of the Orchard Centre shopping centre, this was to deliver 300 new homes. The capacity of the original site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when it was first allocated for development. Please see the Inspector's report (examination library reference LPA101) paragraphs 178-183. That plan was adopted by SODC in December 2020.

The extension to the Orchard Centre has been delivered. Therefore, the site allocation boundary has been reduced due to this and now covers an area of potential regeneration, with the policy recognising the scope for a mix of uses and capacity for approximately 100 homes.

In preparing the Joint Local Plan and site boundary plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

As stated in paragraphs 3.10 and 3.18 in the Statement of Common Ground for this site (examination library reference LPA54) it is common ground between us and the promoters that the policy is robust and soundly based and that the site is capable of delivering at least 100 homes within its boundary.

Q7.2.3 (AS6) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses – residential uses and new employment and retail uses.

The South Oxfordshire Local Plan 2035 (examination library reference ALP01) established the principle of residential, employment and retail uses on this site. Please see our response to Q7.2.1 for the background to these uses and their reassessment.

The retail element of this site was determined because the allocation is situated within Didcot's recently reviewed town centre boundary and we consider that this allocation is very much part of the town centre – parts of the site are already currently used as, and appropriate for, town centre uses – an element of retail would be appropriate at this site because it is within that boundary.

As highlighted in the council's Response to Key Issues (examination library reference LPA48) 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 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. Therefore, the retail element of this site remains appropriate.

Q7.2.4 (AS6) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS6, together with the relevant plan-wide policies, are appropriate to address the potential adverse impacts arising from development at Rich's Sidings and Broadway.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 22-24). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS6 and the relevant plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to Key Issues, (examination library reference LPA48, pages 90-92). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport/traffic

The transport implications of the allocation have been considered through the councils' transport evidence base (including transport modelling (examination library reference ITV03 - Transport Modelling Report) and infrastructure planning (ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper)). The transport modelling assesses the cumulative impacts of growth proposed through the Joint Local Plan and informs the mitigation required to manage those impacts.

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.6.1–3.6.4) provides a site-specific assessment of active travel opportunities and missing links. It identifies that the allocation lies within the Didcot Local Cycling and Walking Infrastructure Plan area, providing connections to residential and commercial areas in and around Didcot. National Cycle Network route 544 passes to the north of the allocation and the safeguarded Didcot Central Corridor extends along its northern boundary. The assessment also identifies missing connections to the Didcot Local Cycling and Walking Infrastructure Plan network and the National Cycle Network. These findings informed the requirements of Policy AS6 for contributions towards, or direct delivery of, a network of safe and attractive walking and cycling routes, including a pedestrian crossing to the east of Station Road and enhanced links to National Cycle Network routes 5 and 544.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS6 assessment, pages 22-24) identifies moderately positive effects overall in relation to sustainable travel. The site lies within walking distance of Didcot Parkway

Train Station, seven bus stops and National Cycle Routes (#5 & 544) and is served by several frequent bus services.

Policy AS6 also provides for mitigation through high-quality walking and cycling infrastructure and improved public transport connections. Transport Assessment at application stage will establish the precise form and timing of necessary mitigation.

Overall, we consider that Policy AS6 provides a clear framework for improving active travel connections as the site is redeveloped. The precise transport impacts and detailed mitigation can be established through the planning application process, alongside the requirements of the plan-wide transport policies. Please also see our response to Question 7.2.6 regarding the effects on the highway network.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS6 assessment, pages 22 -24) identifies minor negative effects in relation to pollution at Rich's Sidings and Broadway, particularly during the construction phase when noise and air pollution could potentially affect nearby residents. The site lies in close proximity to a major railway line and the B4016 (Broadway and Jubilee Way) which are predicted to serve as noise and air pollution sources for new residents. However, given its urban setting, the site does not fall within a Dark Sky Zone or within an area of high tranquillity.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and plan-wide policy requirements.

Nature conservation and biodiversity

The Environment Agency highlighted that appropriate ecological buffer zones should be provided at the site. However, the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS6 assessment, pages 22-24) identifies negligible positive effects on biodiversity. The site is brownfield and currently in industrial use, so lacks ecological features. There are no international, national, or local ecological designations nearby, but potentially opportunities for biodiversity enhancement in the longer term.

Policy AS6 requires new green infrastructure to be provided within the development, whilst development proposals must also meet plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1-3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

This is an urban regeneration site, within Didcot Garden Town, and as such it can play a part in ensuring its development contributes to the policy requirement for the Garden Town as set out in Policy SP3.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS6 assessment, pages 22 - 24) identifies negligible adverse effects in relation to landscape. The site is located within 2 km (925 m at the nearest point) of the North Wessex Downs National Landscape. However, given the location of the site and existing uses, visual impacts on the National Landscape will be minimal. The extent of any effects will be dependent on the scale, layout and massing of the development coming forward.

Given its urban setting, the site does not fall within a Dark Sky Zone or within an area of high tranquillity. In the short-term, construction may result in temporary adverse landscape and visual effects.

Policy AS6 requires public amenity space and green infrastructure within the development.

Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside. These and Policy AS6 provide an appropriate framework to mitigate any potential landscape impacts.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS6 assessment, pages 22 -24) identifies minor adverse effects in relation to the historic environment at Rich's Sidings and Broadway. The Didcot Northbourne Conservation Area is immediately south of the site across Broadway. The extent of any impacts to setting will be dependent on the scale, layout and massing of the development coming forward. The Station Road Conservation Area to the west is likely to be subject to setting impacts due to intervening development.

To mitigate any potential impacts, Policy AS6 requires development proposals to be informed by an assessment of the impact on the Didcot Northbourne Conservation Area.

Flood risk and water management

This is an existing brownfield site, however some respondents raised concerns about potential adverse impacts relating to flood risk, water quality and wastewater infrastructure. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated that improvements would be required to accommodate development and that flood risk from unmodelled channels needs to be considered. The updated flood-risk evidence provides a detailed site-specific assessment of Rich's Sidings and Broadway, including fluvial, surface water and groundwater flood risk and the effects of climate change. The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS6 site assessment) identifies the measures and further assessment necessary to manage the identified risks, including requirements for a site-specific Flood Risk Assessment and further work. The assessment identifies that these detailed matters should be addressed through the site-specific Flood Risk Assessment as development comes forward (AS6 site assessment, section 5.3). This provides an appropriate mechanism for ensuring that the detailed design responds to the identified flood-risk constraints and does not increase flood risk elsewhere.

Wastewater from Policy AS6 would drain to Didcot Sewage Treatment Works. The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.6) assesses the cumulative effects of the Joint Local Plan allocations draining to the works and identifies capacity constraints associated with planned growth. The councils' Response to Key Issues (examination library reference LPA48, page 90) records the Environment Agency's concerns regarding capacity at Didcot Sewage Treatment Works, the improvements required to accommodate development and flood risk associated with unmodelled channels. In the Statement of Common

Ground between South and Vale and the Environment Agency (examination library reference LPA67, Appendix 1, page 14), the EA state they no longer have concerns about the allocation and find the site sound.

These matters have been considered through the Strategic Flood Risk Assessment and Water Cycle Study evidence supporting the plan.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the allocation is sound in relation to flood risk. The Environment Agency identifies an unmodelled ordinary watercourse but confirms that this is not a soundness concern and that the Exception Test is not required.

Policy AS6 is supported by the plan-wide flood-risk and water-management policies, including Policy CE6 (Flood risk) and Policy CE8 (Water quality, wastewater infrastructure and drainage). These provide the framework for the necessary detailed Flood Risk Assessment, drainage measures and wastewater infrastructure requirements to be established and secured through the planning application process.

We therefore consider that the flood-risk and water-management effects of the allocation have been appropriately assessed. The evidence identifies both the issues that need to be addressed and the further detailed assessment and infrastructure necessary as development comes forward.

Taken together, Policy AS6, the relevant plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS6) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is not required to pass the Exception Test as it is not located in Flood Zone 3a.

Q7.2.6 (AS6) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF. Mitigation requirements include walking and cycling infrastructure, with specific reference to the Didcot Local Cycling

and Walking Infrastructure Plan (The Didcot LCWIP[13] forms part of the Local Transport and Connectivity Plan, examination library reference LNP10, pages 38-40), as well as provision for public transport.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in OCC's Regulation 19 representation (a link to the representation is included in Strategic Planning Oxfordshire County Council's Regulation 19 representation), they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS6) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS6 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Rich's Sidings and Broadway. A comprehensive list of the infrastructure requirements for Didcot sites is provided in Section 5 of the IDP (pages 26-27).

Policy IN1 (Infrastructure and Service Provision), states that new development must be served and supported by appropriate and adequate on-site and off-site

[13] Didcot Local Cycling and Walking Infrastructure Plan (LCWIP), Oxfordshire County Council (December 2023): https://mycouncil.oxfordshire.gov.uk/documents/s68729/CMDTM20231214R06%20Annex%201%20-%20Didcot%20LCWIP%20Report.pdf

infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the IDP.

Policy AS6 highlights the main infrastructure requirements of this site:

- Part 2(e) requires all necessary transport infrastructure and mitigation measures to support the development
- Part 2(d) requires inclusion of public amenity space and green infrastructure within the development

These provisions provide the framework for securing the infrastructure identified in the IDP.

The infrastructure requirements, costs and delivery arrangements will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward.

The main physical constraints relating to the allocation are that parts of the site are in close proximity to Didcot Northbourne Conservation Area and railway - and may experience some railway noise. These matters are addressed through the requirements of Policy AS6. Additionally, as described in the supporting text, 'there is a previous history of land contamination at this site' meaning 'drainage systems which infiltrate surface water to the ground should be avoided at this location'. This would be addressed by applying the provisions set out in the Policy part 3(a) regarding mitigation measures, as well as the provisions in Policy CE8 (Water quality, wastewater infrastructure) and Policy CE12 (Soils and contaminated land and drainage) regarding addressing contaminated land.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and Policy AS6, and are appropriately addressed through the requirements of Policy AS6, with the precise infrastructure package and costs to be agreed through the development management process, having regard to the latest available evidence.

Q7.2.8 (AS6) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Rich's Sidings and Broadway (examination library reference LPA54). Paragraph 3.2 confirms that 'the majority of the site is in single landownership', of

Dare Warwick (Properties) Limited and that 'there are no tenancies or land ownership issues relating to the site that prevent its development within the plan period'. Paragraph 3.8 confirms the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development in accordance with the proposed site allocation policy.

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would prevent the allocation from coming forward within the plan period and in accordance with the proposed trajectory set out in our latest Five-Year Housing Land Supply Statement (examination library reference LPA97, page 18).

Q7.2.9 (AS6) How is it intended to bring the site forward for development?

Councils' Response:

The site promoter has advised, through the Statement of Common Ground for Rich's Sidings and Broadway (examination library reference LPA54) that the first dwellings expect to be delivered in a phased approach.

Currently the landowner lets out the majority of the land but has confirmed engagement with the plan making process to ensure the site can be fully utilised in the future.

Q7.2.10 (AS6) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

Given the scale of this site (100 dwellings), the Viability Report (examination library reference ITV04) tested this site as a Typology. This site was represented by Typology BZ (Table 8.13, page 85). This appraisal determined that the site had 'marginal viability'.

In the AspinallVerdi report, 'marginal viability' means that the policy-compliant Residual Land Value is positive, but less than the notional Benchmark Land Value. This is in the context of Oxfordshire which is a very high market value area of the country. Whilst AspinallVerdi have found this site to be 'marginal' in high-level viability modelling for Local Plan viability, it is fully anticipated that this scheme will be brought forward once detailed design and value engineering is carried out in respect of the required infrastructure (even if this means negotiations must take place on land values/profit margins).

Based on a Benchmark Land Value of £1,008,000 per net acre, the scheme generated a Residual Land Value of £930,507 per net acre and an overall deficit of

minus £77,493. Sensitivity testing concluded that the scheme could become viable at a reduced BLV of £900,000 per net acre (see report appendices in examination library reference ITV04.1).

The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a loss of minus £77,493 per net acre, as concluded in the original report (examination library reference ITV04, Table 8.13):

		Build Costs 105% = 5% Increase 50%						
Balance (RLV - BLV £ per acre (n))	(77,493)	55%	70%	85%	100%	115%	130%	145%
	90%	852,457	452,887	52,019	(351,811)	(765,400)	(1,256,597)	(2,032,887)
	92%	906,822	507,318	106,580	(296,809)	(708,406)	(1,183,530)	(1,741,991)
Market Values	94%	961,186	561,712	161,108	(241,904)	(651,904)	(1,110,960)	(1,665,284)
100%	96%	1,015,535	616,106	215,637	(187,050)	(595,751)	(1,038,696)	(1,589,296)
(105% = 5% increase)	98%	1,069,877	670,500	270,162	(132,236)	(539,894)	(970,752)	(1,513,924)
	100%	1,124,219	724,894	324,638	(77,493)	(484,234)	(909,214)	(1,439,137)
	102%	1,178,561	779,288	379,114	(22,762)	(428,762)	(849,436)	(1,364,904)
	104%	1,232,904	833,682	433,590	31,908	(373,432)	(790,862)	(1,291,218)
	106%	1,287,246	888,077	488,066	86,564	(318,215)	(733,125)	(1,218,007)
	108%	1,341,588	942,463	542,519	141,199	(263,104)	(676,002)	(1,145,235)
	110%	1,395,930	996,827	596,950	195,787	(208,082)	(619,342)	(1,072,874)
	112%	1,450,273	1,051,192	651,381	250,375	(153,117)	(563,030)	(1,001,427)
	114%	1,504,615	1,105,556	705,813	304,952	(98,212)	(507,015)	(938,013)
	116%	1,558,957	1,159,921	760,244	359,480	(43,374)	(451,206)	(876,897)
	118%	1,613,299	1,214,285	814,675	414,009	11,440	(395,589)	(817,270)
	120%	1,667,641	1,268,650	869,100	468,537	66,191	(340,126)	(758,691)
	122%	1,721,984	1,323,014	923,494	523,056	120,922	(284,782)	(700,874)
	124%	1,776,326	1,377,379	977,888	577,532	175,623	(229,557)	(643,635)
	126%	1,830,668	1,431,743	1,032,282	632,008	230,278	(174,424)	(586,841)
	128%	1,885,010	1,486,108	1,086,676	686,484	284,934	(119,356)	(530,393)
	130%	1,939,353	1,540,472	1,141,070	740,960	339,555	(64,353)	(474,228)

This table demonstrates that an uplift in values of 6% would be sufficient to achieve viability at the adopted BLV. Should build costs increase by 15%, then the sales values would need to increase by 18% to achieve a viable position. Although house prices have seen little growth since the study was undertaken, this is unlikely to persist over the plan period.

Gerald Eve LLP on behalf of Dare Warwick (Properties) Ltd have suggested that the 50% affordable housing target is restrictive and raise concerns about its impact on the viability of schemes.

The appraisals assume 50% affordable housing and account for the cumulative impact of the Plan's policies. Although they indicate marginal viability, relatively minor scheme adjustments or a reduction in the landowner's value expectations could make the scheme viable.

On this basis, and although the site is currently shown to be marginal in viability terms, we consider that Rich's Sidings and Broadway, including the mix of uses on the site, will be viable and deliverable over the plan period.

Q7.2.11 (AS6) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Rich's Sidings and Broadway.

To ensure a comprehensive proposal, the policy requires a well integrated development with graduated density, that ensures a positive relationship with existing development. It also requires that proposals must ensure that necessary infrastructure is provided, and that the development is informed by relevant assessments and technical studies. To ensure that necessary infrastructure is provided, Policy AS6 requires inclusion of all necessary infrastructure based on up-to-date evidence on the impact of the development.

The Statement of Common Ground (examination library reference LPA54, paragraph 3.12) records agreement that the site-specific requirements set out in Policy AS6 identify the key requirements for this site to deliver.

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for Rich's Sidings and Broadway are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 26-27) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS6) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the expected timescale and rate of development are realistic.

The Housing Land Supply Statement (examination library reference LPA97, page 43) trajectory anticipates the first homes to come forward in 2040/41. We have projected the homes to come forward towards the end of the plan period, as currently we have no clear indication of when a planning application will be submitted.

We consider that the site is in a suitable location for housing development, as demonstrated by its allocation. We have taken a realistic view of site delivery timeframes, based on our understanding of timeframes for first completions for sites of this size. This is a suitable town centre site and there is a reasonable prospect it will be developed at the point envisaged.

The build out rate is based upon the average build-out rate for sites of this size in the district, and is therefore a reasonable assumption.

Q7.2.13 (AS6) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q7.2.4 and Q7.2.10 above, and explain why we consider the plan is sound.

Q7.2.14 (AS6) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The phrase 'in accordance with' is not used within Policy AS6.

Q7.2.15 (AS6) Are any modifications necessary in the interests of soundness?

Councils' Response:

No, there are no proposed modifications to this policy in the interests of soundness.

Policy AS7 – Didcot Gateway

Q7.2.1 (AS7) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Land at Didcot Gateway (examination library reference LPA55, section 2, pages 1-3) details the background to the site allocation.

The site was allocated in the South Oxfordshire Local Plan 2035 (examination library reference ALP01) in Policy H2: New Housing in Didcot, for 300 homes. The allocation was subject to examination through the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector considered Policy H2: New Housing in Didcot within his analysis of Didcot, and concluded that a 'realistic and reasonable approach' had been presented to development in Didcot, which would allow the town to 'grow substantially and play an important part in the spatial strategy whilst ensuring adequate control over growth, phrasing and infrastructure provision' (paragraphs 178-183).

The new Joint Local Plan allocation has reconsidered the capacity of the site for residential development and lowered the amount from 300 to 200 homes, taking account of the potential for the site to support a broader range of land uses. Various landowners collaboratively developed a masterplan for the whole site which includes a mix of uses including residential. Please see the Statement of Common Ground (examination library reference LPA55, paragraph 3.6) for more details about the masterplan.

The site allocation is an area of mixed uses including vacant sites used as car parks, a pub, offices, and a nursery. This area is a key entrance point to Didcot, and as such it would benefit from an enhanced appearance and clearer routes from the station to the rest of the town. There is, therefore, merit in redeveloping the land to improve the appearance of the area and optimise the use of this extremely well-located site. The improvement of the area around Didcot station is key to the regeneration of the town.

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 55-57 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it. The preferred option was to 'retain the current allocation, subject to changes to demonstrate design requirements for the site, and to amend the current allocation's boundary and capacity, from 300 to 200.' The allocation was 'recommended to be retained in the Joint Local Plan'.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Q7.2.2 (AS7) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

As highlighted above, regarding the boundary and capacity of the site allocation, the South Oxfordshire Local Plan 2035 (examination library reference ALP01) allocated the site in Policy H2e: New Housing in Didcot and established the main residential number of approximately 300 units. The capacity of the original site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when it was first allocated for development. Please see the Inspector's report (examination library reference LPA101, paragraphs 178-183). That plan was adopted by South Oxfordshire District Council in December 2020.

As highlighted in Q7.2.1, the Joint Local Plan allocation has reconsidered the capacity of the site for residential development and lowered the amount from 300 to 200 homes, taking account of the potential for the site to support a broader range of land uses. Please see our response to Q7.2.1 for the background to this use and its reassessment.

In preparing the Joint Local Plan and site boundary plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

As stated in paragraphs 3.10 and 3.18 in the Statement of Common Ground for this site (examination library reference LPA54) it is common ground between the

councils' and landowners that parties are working jointly to enable delivery of the planned residential development of approximately 200 homes.

Q7.2.3 (AS7) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses – residential, visitor accommodation (within Use Class C1), new employment and ancillary retail or other service provision (within Use Class E).

The South Oxfordshire Local Plan 2035 (examination library reference ALP01) established the principle of residential uses on this site. Please see our response to Q7.2.1 for the background to the site's uses and their assessment through the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1).

As highlighted in the supporting text of the Joint Local Plan, (examination library reference CSD01, page 218, para 8.60) the site sits in an area that is a 'key entrance point to Didcot' and is an 'extremely well-located site', in walking distance to the town centre. It is opposite Didcot Parkway train station and in close proximity to Bus Stops, National Cycle Routes and Public Rights of Way and is served by several frequent bus services (see 7.2.4 for further details). As also described in the supporting text (paragraph 8.60) the site is in an area of current mixed use, including vacant sites used as car parks, a pub, offices, and a nursery. The existing range of uses set the context for the future of the mix of uses set out in the policy.

Q7.2.4 (AS7) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS7, together with the relevant plan-wide policies, are appropriate to address the potential adverse impacts arising from development at Didcot Gateway.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS3 assessment, pages 25-27). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS7 and the relevant plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to Key Issues, (examination library reference LPA48, pages 92-94). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport/traffic

The transport implications of the allocation have been considered through the councils' transport evidence base (including transport modelling (examination library reference ITV03 - Transport Modelling Report) and infrastructure planning (ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper)). The Transport Modelling Report (examination library reference ITV03, sections 4.3 and 4.5) considers the allocation as part of the Joint Local Plan growth and associated transport network assumptions.

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.7.1–3.7.4) provides a site-specific assessment of active travel opportunities and missing links. It identifies that the allocation lies within the Didcot Local Cycling and Walking Infrastructure Plan area, which provides connections to residential and commercial areas in and around Didcot. National Cycle Network route 5 passes to the north of the allocation and the safeguarded Didcot Central Corridor extends along its northern boundary. The assessment also identifies missing connections to the Didcot Local Cycling and Walking Infrastructure Plan network and the National Cycle Network. These findings informed the requirements of Policy AS7 for contributions towards, or direct delivery of, safe and attractive walking and cycling routes identified in the Didcot Local Cycling and Walking Infrastructure Plan and enhanced links to National Cycle Network routes 5 and 544.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS7 assessment, pages 25-27) identifies moderately positive effects overall in relation to sustainable travel. The site lies in close proximity to Didcot Parkway train station, 12 Bus Stops, National Cycle Routes #5 & 544 and Public Rights of Way and is served by several frequent bus services.

Policy AS7 provides for mitigation through high-quality walking and cycling infrastructure, improved public transport connections. Transport Assessment at application stage will establish the precise form and timing of necessary mitigation.

The site's location at a key entrance to Didcot and the opportunity to improve connections between the station and the wider town centre also form an important part of the rationale for its redevelopment. Detailed transport matters and the precise form of any necessary mitigation can be established through the planning application

process, alongside the requirements of the plan-wide transport policies. We therefore consider that the transport effects of the allocation have been assessed at an appropriate level for plan-making and that the policy safeguards provide an effective framework for mitigation.

Please also see our response to Question 7.2.6 regarding the effects on the highway network.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS7 assessment, pages 25-27) identifies negligible adverse effects in relation to pollution at Didcot Gateway, particularly during the construction phase when noise and air pollution could potentially affect nearby residents. The site is also in close proximity to a major rail line, which would serve as a noise source for new residents. Given its urban setting, the site does not fall within a Dark Sky Zone or within an area of high tranquillity.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land. Policy AS7 also states that development proposals at this site must be informed by an assessment of the potential noise impacts from the existing railway line and mitigation measures required to provide an adequate buffer.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS7 assessment, pages 25-27) identifies negligible positive effects on biodiversity. The site is brownfield, with large parts currently used for car parking and there are no formal ecological designations in and around the site. There are, however, small pockets of vegetation which could support protected species and potential opportunities for biodiversity enhancement in the longer term.

Policy AS7 requires development proposals to demonstrate protection and enhancement of existing priority habitats and include public amenity space and green infrastructure. Proposals must also meet the plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1 – 3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

This is an urban regeneration site, within Didcot Garden Town, and as such it can play a part in ensuring its development contributes to the policy requirement for the Garden Town as set out in Policy SP3.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS7 assessment, pages 25-27) identifies negligible negative effects in relation to landscape. The site falls within 2 km (1500 m at the nearest point) of the North Wessex Downs National Landscape. However, given the location of the site and existing uses, visual impacts on the National Landscape will be minimal. The extent of any effects will be dependent on the scale, layout and massing of the development coming forward.

Given its urban setting, the site does not fall within a Dark Sky Zone or an area of high tranquillity. In the short-term, construction may result in temporary adverse landscape and visual effects.

Policy AS7 follows a landscape-led approach which requires new public amenity space and green infrastructure within the development. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that Policy AS7 and plan wide policies provide an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS7 assessment, pages 25-27) predicts minor adverse effects in relation to the historic environment for Didcot Gateway. The site lies within 500m of 13 Grade II, and one Grade II* Listed Buildings, most of which are located within the Didcot Old and Didcot Station Road Conservation Area. Direct impacts are unlikely, however the possibility of impacts to the setting of the designated features may be greater.

To mitigate any potential impacts, Policy AS7 requires development proposals to take a landscape-led approach to design that is informed by the character of the adjoining Conservation Area.

Flood risk and water management

Some respondents raised concerns about potential adverse impacts relating to flood risk, water quality and wastewater infrastructure. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated that improvements would be required to accommodate development. Oxfordshire County Council suggested an amendment to the policy for clarity that a flood risk assessment is required. We responded to these concerns in the councils' Response to Key Issues, regarding Regulation 19 representations (examination library reference LPA48, pages 79-80).

The updated flood-risk evidence provides a detailed site-specific assessment of Didcot Gateway, including the relevant sources of flood risk and the measures and further assessment necessary to manage any identified risks. The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS7 site assessment) provides the site-specific assessment and identifies the requirements to be addressed as development comes forward. As the site is not located in Flood Zone 3a, it could be allocated if development avoids the area at modelled surface water flood risk. Surface water risk should be attenuated onsite and included in site design and layout (LPA45).

Wastewater from Didcot Gateway would drain to Didcot Sewage Treatment Works. The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.6) assesses the cumulative effect of Joint Local Plan growth draining to Didcot Sewage Treatment Works and identifies capacity constraints associated with planned development. However, as part of Thames Water's enhancement case for sewage treatment growth, Didcot STW has been identified as 1 of 15 STWs that will have their treatment capacity exceeded during the period 2025-2030. In addition, the plan-wide requirements of Policy CE8 (Water quality, wastewater infrastructure and

drainage) provide the framework for development to be coordinated with the wastewater infrastructure necessary to serve it. The detailed requirements can therefore be established through the planning application process, informed by the latest position on infrastructure capacity and necessary improvements.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the allocation is sound in relation to flood risk. The Environment Agency confirms that there are no flood-risk concerns and that the Exception Test is not required.

We therefore consider that the flood-risk and water-management effects of the allocation have been appropriately assessed and that the identified issues do not prevent the allocation from being developed. The evidence and plan-wide policy framework provide an appropriate basis for securing any necessary detailed flood-risk, drainage and wastewater infrastructure mitigation as development comes forward.

Taken together, Policy AS7, the relevant plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS7) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village , the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of

the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is not required to pass the Exception Test as it is not located in Flood Zone 3a.

Q7.2.6 (AS7) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF. Mitigation requirements include walking and cycling infrastructure, with specific reference to the Didcot Local Cycling and Walking Infrastructure Plan (The Didcot LCWIP[14] forms part of the Local Transport and Connectivity Plan, examination library reference LNP10, pages 38-40), as well as provision for public transport.

[14] Didcot Local Cycling and Walking Infrastructure Plan (LCWIP), Oxfordshire County Council (December 2023): https://mycouncil.oxfordshire.gov.uk/documents/s68729/CMDTM20231214R06%20Annex%201%20-%20Didcot%20LCWIP%20Report.pdf

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in OCC's Regulation 19 representation (a link to the representation is included in Strategic Planning Oxfordshire County Council's Regulation 19 representation), they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS7) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS7 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Didcot Gateway. A comprehensive list of the infrastructure requirements for Didcot sites is provided in Section 5 of the IDP (pages 26-27).

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the Infrastructure Delivery Plan.

Policy AS7 highlights the main infrastructure requirements of this site:

- Part 2(f) requires all necessary transport infrastructure and mitigation measures to support the development
- Part 2(d) requires inclusion of public amenity space and green infrastructure within the development

These provisions provide the framework for securing the infrastructure identified in the IDP.

The infrastructure requirements, costs and delivery arrangements will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward.

The main physical constraints relating to the allocation are that parts of the site are in close proximity to the railway - and may experience some railway noise. These matters are addressed through the requirements of Policy AS7. Additionally, as described in the supporting text, 'there is a previous history of land contamination at this site' meaning 'drainage systems which infiltrate surface water to the ground should be avoided at this location'. This would be addressed by applying the provisions set out in the Policy part 3(a) regarding mitigation measures, as well as the provisions in Policy CE8 (Water quality, wastewater infrastructure) and Policy CE12 (Soils and contaminated land and drainage) regarding addressing contaminated land.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and Policy AS7, and are appropriately addressed through the requirements of Policy AS7, with the precise infrastructure package and costs to be agreed through the development management process, having regard to the latest available evidence.

Q7.2.8 (AS7) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Land at Didcot Gateway (examination library reference LPA55). The site is owned by multiple parties (South Oxfordshire District Council, Soha, Homes England and Oxfordshire County Council). Paragraph 3.1 confirms the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

There is clear evidence of promoter interest in bringing the site forward. Our latest Housing Land Supply Statement (examination library reference LPA97, page 104) confirms that South Oxfordshire District Council are currently considering an outline

application for 144 dwellings submitted by Homes England in February 2022 (P22/S0491/O[15]).

The statement also confirms that 'the council and applicant are not aware of any land ownership constraints affecting this site. Homes England has advised [they] will need to sell the site to a developer before construction work can commence'.

We are therefore satisfied that there is a clear landownership position and no landownership or developer interest issues that would prevent the allocation from coming forward within the plan period and in accordance with the proposed trajectory set out in our latest Housing Land Supply Statement (examination library reference LPA97, pages 113-114).

Q7.2.9 (AS7) How is it intended to bring the site forward for development?

Councils' Response:

As highlighted in 7.2.8, our latest five-year housing land supply statement (Housing Land Supply Statement (examination library reference LPA97, page 111) confirms that South Oxfordshire District Council are currently considering an outline application for 144 dwellings submitted by Homes England in February 2022 (P22/S0491/O[16]).

The promoter has indicated that they expect construction work to commence in 2029 – subject to securing developer partner and obtaining the necessary planning permissions.

The five-year housing land supply statement confirms that Homes England has resolved all technical issues with the plans, with the sole exception of affordable housing provision.

The statement also confirms that Oxfordshire County Council has started early construction work on a suite of transport infrastructure improvements around Didcot, expecting these works to intensify throughout 2026. These improvements, collectively known as Housing Infrastructure Fund 1 (HIF1), include a new Thames Crossing, a bypass for Clifton Hampden, a new bridge over the A4130 and railway to the west of Didcot, and the dualling of the A4130. The investment in, and delivery of, this infrastructure is enabling and supporting development in and around Didcot, including this site.

[15] Planning Application P22/S0491/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22/S0491/O
[16] Planning Application P22/S0491/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22/S0491/O

We are therefore satisfied that active work is underway to progress the housing element of the site and that there is a clear route to delivery of the allocation.

[Please note, South Oxfordshire District Council (as landowner) were also granted planning permission for their full application for a 'proposed new office building together with associated development on the Didcot Gateway Site' under application P23/S2621/FUL[17]. However, South Oxfordshire District Council's Full Council meeting voted, on 17 July 2025[18], 'to cease further work on the "Didcot Gateway Regeneration Schemes" capital scheme in light of impending Local Government Reorganisation' and for 'the site to be handed over in good order to any future authority'].

Q7.2.10 (AS7) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

Given the scale of this site (200 dwellings), the Viability Report (examination library reference ITV04) tested this site as a Typology. This site was represented by Typology CA (Table 8.14, page 86). This appraisal determined that this site had "marginal viability". Based on a Benchmark Land Value of £1,008,000 per net acre, the scheme generated a Residual Land Value of £827,165 per net acre and an overall deficit of minus £180,835. Sensitivity testing concluded that the scheme could become viable at a reduced BLV of £950,000 per net acre (see report appendices in examination library reference ITV04.1).

The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a loss of minus £180,835 per net acre, as concluded in the original report (examination library reference ITV04, Table 8.14):

[17] Planning Application P23/S2621/FUL, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P23%2FS2621%2FFUL
[18] Councillor Call for Action, South Oxfordshire District Council: https://democratic.southoxon.gov.uk/mgAi.aspx?ID=21119

		Build Costs 105% = 5% Increase 50%						
Balance (RLV - BLV £ per acre (n))	(180,835)	55%	70%	85%	100%	115%	130%	145%
	90%	749,922	350,222	(50,953)	(455,849)	(875,187)	(1,395,260)	(2,951,421)
	92%	804,287	404,653	3,635	(400,666)	(816,671)	(1,321,210)	(2,384,286)
Market Values	94%	858,651	459,084	58,223	(345,587)	(759,069)	(1,247,702)	(1,817,151)
100%	96%	913,016	513,513	112,781	(290,589)	(702,103)	(1,174,707)	(1,732,032)
(105% = 5% increase)	98%	967,380	567,907	167,310	(235,684)	(645,621)	(1,102,191)	(1,655,590)
	100%	1,021,728	622,301	221,838	(180,835)	(589,484)	(1,029,965)	(1,579,779)
	102%	1,076,070	676,695	276,361	(126,021)	(533,634)	(964,070)	(1,504,586)
	104%	1,130,412	731,089	330,837	(71,282)	(477,981)	(902,727)	(1,429,994)
	106%	1,184,754	785,484	385,313	(16,551)	(422,522)	(843,021)	(1,355,917)
	108%	1,239,097	839,878	439,789	38,116	(367,198)	(784,486)	(1,282,324)
	110%	1,293,439	894,272	494,265	92,771	(311,986)	(726,784)	(1,209,184)
	112%	1,347,781	948,657	548,716	147,403	(256,875)	(669,691)	(1,136,466)
	114%	1,402,123	1,003,021	603,147	201,991	(201,858)	(613,050)	(1,064,105)
	116%	1,456,465	1,057,386	657,578	256,579	(146,898)	(556,754)	(993,527)
	118%	1,510,808	1,111,750	712,010	311,154	(91,993)	(500,747)	(931,460)
	120%	1,565,150	1,166,115	766,441	365,682	(37,159)	(444,946)	(870,426)
	122%	1,619,492	1,220,479	820,872	420,210	17,655	(389,343)	(810,855)
	124%	1,673,834	1,274,844	875,295	474,738	72,402	(333,885)	(752,315)
	126%	1,728,177	1,329,208	929,689	529,255	127,133	(278,547)	(694,533)
	128%	1,782,519	1,383,573	984,083	583,731	181,830	(223,322)	(637,315)
	130%	1,836,861	1,437,937	1,038,477	638,207	236,486	(168,195)	(580,539)

This table demonstrates that an uplift in values of 8% would be sufficient to achieve viability at the adopted BLV. Should build costs increase by 15%, then the sales values would need to increase by 22% to achieve a viable position. Although house prices have seen little growth since the study was undertaken, this is unlikely to persist over the plan period. Values in the area have been relatively resilient, and it is expected that the market will return fairly quickly in this area on stabilisation of the wider economy.

The appraisals produced suggest that with relatively minor adjustments, were the landowner to accept a 6% reduction in BLV say, then the scheme could be viable and deliverable.

On this basis, and although the site is currently shown to be marginal in viability terms, we consider that Land at Didcot Gateway, including the mix of uses on the site, will be viable and deliverable over the plan period.

Q7.2.11 (AS7) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Didcot Gateway.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 that necessary infrastructure is provided and that proposals are well integrated with neighbouring uses, Policy AS7 requires inclusion of all necessary infrastructure based on up-to-date evidence on the impact of the development; and incorporation of graduated density and active frontages within the development to ensure a positive relationship with surrounding roads.

The Statement of Common Ground (examination library reference LPA55, paragraph 3.7) records agreement that 'work on the site to date aligns with the requirements of Policy LS1 (Proposals for large scale major development), and the parties agree that it is appropriate to demonstrate accordance with this policy for any future planning applications'. Paragraph 3.9 also highlights agreement that the Didcot Gateway masterplan (agreed between the landowners) outlines how infrastructure and design has already been considered to inform existing proposals and planning applications for the site.

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for Didcot Gateway are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 26-27) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS7) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the projected timescale and rate of development is realistic. The site delivery assessment contained in the Housing Land Supply Statement (examination library reference LPA97, pages 111-114) refers to the part of the site being brought forward by Homes England, with an outline application currently under consideration. (Page 113 of LPA97 sets out the conclusions made in respect of the development trajectory for this part of the site, with the key conclusions being:

- SODC are currently considering an outline application for 144 dwellings submitted by Homes England in February 2022 (P22/S0491/O). Homes England has submitted amended plans to respond to technical comments in December 2022, May 2023, August 2023, January 2024, and March 2024. Homes England has resolved all technical issues with the plans, with the sole exception of affordable housing provision.

- The landowner suggests that construction could commence in 2029, subject to securing a developer partner; therefore we consider that homes could realistically be delivered from 2031/32 onwards.

A further 60 homes are expected to come forward on part of the site which is owned by South Oxfordshire Housing Association (Soha). We have no clear indication of when an application will be submitted to bring forward these homes, so have projected that they will deliver later in the plan period, in 2036/37.

Q7.2.13 (AS7) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our response to questions Q7.2.4 above, and explain why we consider the plan is sound or that a main modification is needed (see Q7.2.15).

Q7.2.14 (AS7) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The phrase 'in accordance with' is not used within Policy AS7.

Q7.2.15 (AS7) Are any modifications necessary in the interests of soundness?

Councils' Response:

Yes, we would like to make a modification to this policy in the interests of soundness as follows, regarding part 1:

[PROPOSED MODIFICATION] Policy AS7, part 1

1) Land at Didcot Gateway (as shown on the Policies Map) is allocated to deliver a mixed-use scheme comprising approximately 200 new homes, visitor accommodation[a], new employment and ancillary retail[b] or other service provision[c~~b~~] to support the allocated site.

b With a gross floorspace of a maximum 500 sq.m gross ~~Within Use Class E~~ in accordance with Policy TCR2.
c Within Use Class E.

This clarifies that we intend to limit the floorspace to 500sqm as per Policy TCR2, so proposals are not subject to the sequential test.

Policy AS8 – North West of Grove, Grove

Q7.2.1 (AS8) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for North West of Grove (examination library reference LPA56, section 2, pages 2-3) details the background to the site allocation. The site was first allocated through Core Policy 15a of the Vale of White Horse Local Plan 2031 Part 2 (LPP2) (examination library reference ALP04) for approximately 400 homes.

The rationale for allocating the site was considered through the examination of LPP2. In paragraphs 83-87 of the LPP2 Inspector's Report (examination library reference LPA100), the Inspector concluded that the site represented a logical and sustainable location for growth. The site lies between the strategic allocations at Grove Airfield (HOU2q) and Monks Farm (HOU2p), both of which were already allocated and are now almost completely built out. The Inspector found that the site forms a natural extension to those developments, with no significant constraints. Furthermore, the allocation would assist in the delivery of the Grove Northern Link Road and a comprehensive, integrated pattern of development including road, cycle and pedestrian connections, strategic open space and potentially a new primary school.

The Inspector also concluded that, while there were concerns about early delivery of homes, the allocation was justified because it would facilitate the comprehensive development of the wider area. The Inspector therefore found the allocation justified, effective and consistent with national policy.

In preparing the Joint Local Plan, we did not simply carry forward the Vale LPP2 allocation. The site was reassessed alongside reasonable alternatives through the JLP site selection process. The Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 61-63 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it.

The preferred option was to retain the current allocation, subject to a new policy incorporating the site's updated capacity (600 homes) based on delivery to 2041,

with presentational changes of the existing criteria / requirements for this site; and the allocation was “recommended to be retained in the Joint Local Plan”.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Q7.2.2 (AS8) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils’ Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found by the Inspector of LPP2 (examination library reference LPA100, paragraphs 87) when VOWH first allocated for development for around 400 homes and associated infrastructure. Core Policy 4a of LPP2 acknowledges that the site has the capacity to deliver more housing, subject to appropriate infrastructure improvements – in this case, whether the developer would need to deliver a primary school on site. Since we adopted LPP2, negotiations with the site promoter and the local education authority has demonstrated that a primary school is not needed on site, and therefore the capacity of the site will increase to around 600 homes. There has been no change in circumstances that have caused a need for a revision to the boundary assumptions.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

As stated in the Statement of Common Ground for this site (examination library reference LPA56), it is common ground between us and the site promoter that the allocation is robust and soundly based, and that approximately 600 dwellings can be delivered within the AS8 site allocation boundary.

The promoter's Regulation 19 representation questioned the inclusion of a requirement for older persons' accommodation, given the progression of the submitted outline planning application (P20/V3113/O[19]) and raised concerns regarding a number of detailed policy requirements and infrastructure obligations. We considered these matters and concluded that the requested changes were not

[19] Planning Application P20/V3113/O, Vale of White Horse District Council: https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P20%2FV3113%2FO

necessary to address issues of soundness. Our position is set out in the councils' Response to Key Issues (examination library reference LPA48, pages 96-97).

For consistency, all residential focused allocation without planning permission are expected to accommodate a proportion of the identified older persons' housing need for that district. Whilst we acknowledge that the outline application for this site is at an advanced stage in the development management process, planning permission has not yet been granted. Should the current application be withdrawn or refused, any future planning application for the site would be required to accommodate the identified requirement for 60 units of older persons' accommodation.

If the proposed 60 units do not come forward through the current application, there remains sufficient capacity to address older people's needs across the plan period. There is a total housing with care need for Vale of White Horse of 324 (see our response to 9.3.2). The table below identifies a supply of 275 units from existing permissions. This leaves 49 homes for the three large scale allocations in Vale of White Horse to deliver. If North West Grove doesn't deliver its 60 units, then there are still 270 homes to come forward on the other two sites, which more than exceeds the need for this type of accommodation.

While this represents a substantial level of headroom, 180 of these units are planned as part of the Land North of Dalton Barracks allocation. As a strategic site expected to continue delivering development beyond the plan period, it is likely that some of these units will be completed after 2043, notwithstanding the possibility that all 180 units could be delivered within the current plan period.

Land south of Park Road, Faringdon P22/V2053/RM	60	Completed in 2025/26
Land North of Copenhagen Road, Abingdon P23/V2861/O	75	Forecast for completion in 2028/29
Land East of Kingston Bagpuise, P22/V0248/O	60	Forecast for completion on site – some point between 2027/28 and 2033/34
North of Abingdon on Thames P17/V0050/O	80	Forecast for completion in 2030/31
Total	275	

Q7.2.3 (AS8) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses comprising residential development, including housing with care for older people, together with associated green infrastructure and open space.

The site was originally allocated through LPP2 (examination library reference ALP04) for residential-led development and has been carried forward into the Joint Local Plan. Please see our response to Q7.2.1 for the background to these uses and their reassessment.

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 60 units on this site.

Q7.2.4 (AS8) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policies AS8, together with the relevant Plan-wide policies, are appropriate to address the potential adverse impacts arising from development of North West of Grove.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS8 assessment, pages 28-30). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS8 and the relevant Plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to the Key Issues, (examination library reference LPA48, pages 95-97). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport/traffic

The transport implications of the allocation have been considered through our transport evidence base (including transport modelling (examination library reference ITV03 - Transport Modelling Report) and infrastructure planning (ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper)).

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.9.1-3.9.4) provides a site-specific assessment of active travel opportunities for the site. It identifies that the allocation is bound by further housing allocations, which already seek to enable good active travel permeability. The assessment also identifies that the Strategic Active Travel Network seeks to extend active travel opportunities northwards from the north-western corner of the allocation towards Denchworth, as well as north-eastwards towards East Hanney and West Hanney. However, there are restrictions to north-south routes between the allocation and the Public Right of Way network to the north due to the railway line bordering the northern boundary.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS8 assessment, pages 28 -30) also identifies minor positive effects overall in relation to sustainable travel. Three bus stops and several Public Rights of Way are accessible from the site, with bus services providing connections to Didcot and Wantage.

Policy AS8 requires development to be brought forward through a comprehensive masterplan and includes requirements to promote sustainable travel, connectivity and integration with surrounding areas. We also acknowledged that Network Rail suggested the policy should make direct reference to mitigating public safety issues regarding the Grove Level crossing. As mentioned in the councils' Response to Key Issues (examination library reference LPA48, page 95), the Infrastructure Delivery Plan (examination library reference LPA17, Appendix 2.7) identifies the transport infrastructure required to support development, including the Grove Northern Link Road, improvements to Public Rights of Way and, where appropriate, connections across the Great Western Railway to the north of the site. This includes 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.

The developer's Regulation 19 representation states that they do not consider it their responsibility to deliver the entirety of the Grove Northern Link Road, as part of the route is expected to be secured through the adjacent Monks Farm development. We confirmed our position in LPA48 (page 97) that we do not consider they are matters of soundness that requires a modification to the submitted plan. As Policy AS8 part 2(d) does not prescribe a specific package of transport mitigation in all circumstances. Rather, it requires development proposals to demonstrate the infrastructure necessary to mitigate transport impacts, with mitigation measures likely to include completion of the Grove Northern Link Road. The precise nature and extent of transport mitigation will be established through the Transport Assessment and planning application process.

Policies LS1 and IN2 also require the preparation of a Transport Assessment and Travel Plan to ensure that the transport impacts of development are appropriately assessed and mitigated. Policy AS8 also provides for mitigation through high-quality walking and cycling infrastructure, improved bus services and bus priority measures under part 2(d).

Overall, we consider that transport and public safety impacts have been identified and can be effectively mitigated through the policy framework and planning application process. Please also see our response to Question 7.2.6 regarding the effects on the highway networks.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS8 assessment, pages 28 - 30) identifies moderate negative effects in relation to pollution, particularly during the construction phase when noise and air pollution could potentially affect nearby residents to the south-west in Grove. The site is also adjacent to the Great Western railway line, which would serve as a noise source for future residents. The majority of the site falls within Dark Skies Zone E1 and there is, therefore, an increased risk of light pollution effects. The majority of the site also falls within an area of relative tranquillity.

Policy AS8 contains specific safeguards in relation to noise impacts. Part 2(j) requires that potential noise impacts from the existing railway line are investigated and that any necessary mitigation measures are implemented to provide an adequate buffer. Part 2(k) further requires that any land used for noise mitigation is not relied upon to meet open space requirements for parks and gardens, recreation grounds, allotments, or provision for children's play and spaces for young people, whilst ensuring that such areas incorporate good quality green infrastructure.

The supporting text to the policy (paragraph 8.66) explains that development will be required to mitigate potential noise impacts from the railway line to ensure that these do not unacceptably affect the health and wellbeing of future residents, and that the masterplan should ensure that public open space is not concentrated within any noise buffer areas.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the Plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land. Policy AS8 also requires development proposals to demonstrate that noise impacts from the existing railway line have been investigated, and any necessary mitigation measures have been implemented to provide an adequate buffer.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and Plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS8 assessment, pages 28 -30) predicts negligible adverse effects on biodiversity, noting that boundary hedgerows may support protected / notable species which could be impacted by the works. The site is not within any international, national, or local ecological designation.

Policy AS8 requires a landscape-led approach, where development proposals must demonstrate how the site will contribute towards biodiversity net gain and redressing the identified green infrastructure deficit in the area surrounding Wantage and Grove, whilst also meeting the plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (AA) (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the council's (examination library reference LPA47, paragraphs 3.1-3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS8 assessment, pages 28-30) identifies negligible adverse effects in relation to landscape and visual impacts, subject to site-specific landscape assessment. Whilst the site is located more than 2km from any National Landscape, much of the site falls within a Dark Skies Zone and an area of relative tranquillity, meaning that development has the potential to affect local landscape character and visual amenity. The extent of any impacts will depend on the scale, layout and massing of development.

Policy AS8 responds through a landscape-led approach. Part 2(g) requires the delivery of a new landscape structure building on existing landscape features and responding to the most up-to-date landscape evidence, including the Joint Landscape Character Assessment. Part 2(h) also requires development to contribute

towards addressing the identified green infrastructure deficit in the Wantage and Grove area. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

The supporting text to the policy (paragraph 8.67) recognises that, together with the adjacent allocations at Grove Airfield and Monks Farm, the site forms an extension to Grove and that the western boundary in particular will require sensitive treatment to create a landscape structure that contains development whilst building on existing landscape features.

We therefore consider that the potential landscape and visual effects have been appropriately identified and that Policy AS8, together with the relevant Plan-wide landscape and design policies, provides an effective framework for their mitigation.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS8 assessment, pages 28-30) identifies minor adverse effects in relation to the historic environment for North-West of Grove. The site is within 500 m of 11 Grade II Listed Buildings. Most of these features are located within the Grove Conservation Area, but there is also a cluster of 3 Listed Buildings around Monk's Farmhouse. Impacts to the setting of all these features are possible, depending on the scale and massing of development proposed.

Policy AS8 also requires development proposals to demonstrate how it will conserve and enhance the setting of the nearby cemetery on Denchworth Road, and contribute to its expansion.

Representations raised concerns regarding potential heritage impacts. In response, we confirmed that Policies LS1 and NH8 require a Heritage Impact Assessment to be undertaken for the site and therefore no modification to Policy AS8 was necessary (examination library reference LPA48, page 95).

Any planning application will therefore need to demonstrate how the significance and setting of heritage assets have informed the design and layout of development, and how any impacts have been avoided, minimised or appropriately mitigated.

Overall, we consider that the policies of the plan provide an appropriate framework to mitigate any potential landscape effects.

Flood risk and water management

In relation to water quality and wastewater infrastructure, the Environment Agency raised concerns regarding wastewater treatment capacity (examination library reference LPA48, page 96). Since submission of the plan, the councils' have completed the Water Cycle Study Detailed Report and agreed a Statement of Common Ground with the Environment Agency (examination library reference

LPA67). The Statement of Common Ground confirms that AS8 would drain to Wantage Sewage Treatment Works and notes that Thames Water does not envisage concerns regarding the capacity of Wantage Sewage Treatment Works to accommodate additional flows from the allocation.

The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.9) identifies AS8 as one of the JLPs allocations draining to Wantage Sewage Treatment Works. While Thames Water do not identify any concerns, the study identifies that Wantage Sewage Treatment Works is currently exceeding its permitted dry weather flow and that additional development, including growth arising from AS8, will increase flows to the works. The study therefore concludes that a revised permit and wastewater infrastructure upgrades will be required to support planned growth. However, this is identified as an infrastructure requirement rather than a constraint that prevents the allocation from coming forward. Policy CE8 provides the mechanism for aligning development with sufficient new or upgraded wastewater infrastructure, including through phasing where necessary.

The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS8 Site Assessment) provides a detailed site-specific assessment of flood risk and identifies the mitigation and further assessment required as development comes forward. The assessment concludes that the site is potentially suitable for development subject to mitigation, including avoiding areas of significant surface water flooding, retaining natural drainage pathways and incorporating sustainable drainage measures. The SFRA also recommends that these matters are investigated further through a site-specific Flood Risk Assessment and detailed drainage strategy.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67) also confirms that there are no outstanding flood risk soundness concerns relating to the allocation. Policy AS8 is further supported by Policies CE8 and IN1, which provide an appropriate framework to ensure development is aligned with the delivery of the necessary wastewater infrastructure upgrades.

We therefore consider that flood-risk and water-management effects have been appropriately assessed through the SFRA process, Water Cycle Study and Statement of Common Ground, and can be effectively mitigated through the policy framework and detailed assessment at planning application stage.

Taken together, Policy AS8, the relevant Plan-wide policies and the identified site-specific mitigation measures provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. The Statement of Common Ground with the Environment Agency confirms that there are no outstanding flood risk soundness concerns relating to the allocation. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS8) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is not required to pass the Exception Test as it is not located in Flood Zone 3a.

Q7.2.6 (AS8) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, Policy AS8 identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the existing allocation in the adopted local plan, and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in OCC's Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS8 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of North West of Grove. Detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing are set out in Appendix 2.7: Infrastructure Requirements for North West of Grove (Policy AS8).

Policy IN1 – Infrastructure and Service Provision, states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the IDP.

The infrastructure requirements identified in the IDP are reflected directly in Policy AS8:

- Part 2(c) requires sufficient additional education capacity, including contributions towards primary, secondary and Special Educational Needs and Disabilities (SEND) provision.
- Part 2(d) requires all necessary infrastructure based on up-to-date evidence on the impact of the development. This includes transport mitigation measures such as the likely delivery of the Grove Northern Link Road, improvements to public transport, walking and cycling connections, and improvements to Public Rights of Way.
- Part 2(g), 2(h) and 2(i) require the delivery of strategic landscaping, green infrastructure and biodiversity enhancements across the site.
- Part 2(j) and 2(k) require potential noise impacts from the adjacent railway line to be investigated and mitigated. Where noise buffers are required, Policy AS8 ensures that they incorporate good quality green infrastructure and are not relied upon to meet open space requirements.

Additionally, Policy LS1, which is applicable to AS8, requires at part 1(e) that development proposals ensure the provision of necessary supporting infrastructure, including social and community infrastructure. Developers must engage with relevant infrastructure providers to support the implementation of the IDP. Together with the requirements of Policy AS8, these provisions provide an appropriate framework for securing the infrastructure identified in the IDP.

The principal constraints relating to the allocation are the delivery of the infrastructure required to support growth, particularly transport infrastructure and mitigation identified through Policy AS8 and IDP, together with environmental considerations relating to flood risk, wastewater infrastructure, biodiversity, landscape, heritage assets and noise arising from the adjacent railway line. These matters are addressed through the requirements of Policy AS8, the relevant Plan-wide policies and supporting evidence base documents, and will be considered further through the comprehensive masterplan required by part 2(a).

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a standard and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan will ensure that infrastructure provision and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements, indicative costs and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policy AS8 and Policy LS1, with the precise

infrastructure package, costs and phasing to be agreed through the development management process having regard to the latest available evidence.

Q7.2.8 (AS8) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for North West of Grove (examination library reference LPA56). Paragraph 2.6 confirms that the developer, Persimmon Homes, control the land and has the ability to develop the site within the proposed timescales. Paragraph 3.2 further confirms that the site is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

There is clear evidence of developer interest in bringing the site forward. Persimmon Homes submitted outline planning application (P20/V3113/O[20]) in November 2020 for up to 624 dwellings and has continued to progress the application through the submission of revised plans and supporting information. Our latest five-year housing land supply statement (examination library reference LPA98, pages 75-78) confirms that revised plans were submitted in August 2026 and that the councils' are not aware of any viability issues or land ownership constraints affecting the site.

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would prevent the allocation from being capable of coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS8) How is it intended to bring the site forward for development?

Councils' Response:

The site is intended to be brought forward through the determination of outline planning application (P20/V3113/O[21]) which seeks permission for up to 624 dwellings and associated infrastructure. The application has been supported by further technical work and revised plans submitted in response to consultee comments.

The developer confirms, through the latest five-year housing land supply statement (examination library reference LPA98, pages 75-78), that revised plans were submitted in August 2026 and that discussions are continuing to address the

[20] Planning Application P20/V3113/O, Vale of White Horse District Council: https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P20%2FV3113%2FO
[21] Planning Application P20/V3113/O, Vale of White Horse District Council: https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P20%2FV3113%2FO

remaining technical matters. The statement also notes that Heads of Terms for a Section 106 agreement have been provided and that work is ongoing to progress the application towards determination. The planning application is being considered by VOWH at the time of this MIQs submission.

We are therefore satisfied that there is a clear and established route to bringing the site forward through the planning application process, the completion of the necessary planning obligations and the subsequent delivery of the allocation.

Q7.2.10 (AS8) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

Yes, the development proposed under Policy AS8, including the mix of uses on the site, is viable and deliverable over the plan period.

The Viability Report (examination library reference ITV04) determined that this site was viable. Based on a Benchmark Land Value of £420,000 per net acre, the scheme generated a Residual Land Value of £1,153,835 per net acre (Table 9.3, p104), resulting in a generous viability surplus of circa £18,128,538 in total.

As part of the Viability Report, AspinallVerdi did not conclude on the deliverability of this site. Although invitations to engage in the process were issued, no meeting was held, and no cost information was submitted by the promoter. However, the site is controlled by Persimmon Homes, who submitted an outline planning application in November 2020 (P20/V3113/O[22]) for up to 624 dwellings. Persimmon has continued to progress the application through the submission of revised plans and supporting information. On this basis, we consider that the site is deliverable.

In terms of viability across the plan period, the following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a viability surplus of £733,835, as concluded in the original report (examination library reference ITV04, Table 9.2):

[22] Planning Application P20/V3113/O, Vale of White Horse District Council: https://valeofwhitehorse.planning-register.co.uk/Planning/Display?applicationNumber=P20%2FV3113%2FO

				Build Costs	105 = 5% increase			
Balance (RLV - BLV £ per acre (n))	733,835	55%	70%	85%	100%	115%	130%	145%
	80%	1,478,613	913,808	344,843	(231,946)	(885,092)	(1,598,028)	(2,414,983)
	82%	1,573,346	1,009,078	441,053	(134,013)	(768,191)	(1,468,408)	(2,271,190)
Market Values	84%	1,668,078	1,104,206	537,029	(36,425)	(652,102)	(1,346,871)	(2,127,398)
100%	86%	1,762,795	1,199,278	632,778	60,876	(536,661)	(1,226,883)	(1,983,605)
(105% = 5% increase)	88%	1,857,384	1,294,257	728,394	157,782	(421,799)	(1,108,167)	(1,840,079)
	90%	1,951,974	1,389,150	823,881	254,349	(322,783)	(990,456)	(1,699,391)
	92%	2,046,563	1,484,043	919,201	350,635	(224,828)	(873,721)	(1,572,577)
	94%	2,141,133	1,578,802	1,014,471	446,694	(127,201)	(757,686)	(1,451,537)
	96%	2,235,598	1,673,534	1,109,586	542,580	(29,845)	(642,278)	(1,331,873)
	98%	2,330,063	1,768,266	1,204,658	638,302	67,133	(527,430)	(1,213,418)
	100%	2,424,528	1,862,929	1,299,658	733,835	163,789	(413,716)	(1,095,909)
	102%	2,518,992	1,957,519	1,394,551	829,322	260,179	(315,643)	(979,252)
	104%	2,613,457	2,052,108	1,489,444	924,594	356,358	(217,977)	(863,269)
	106%	2,707,821	2,146,697	1,584,258	1,019,864	452,334	(120,566)	(747,895)
	108%	2,802,179	2,241,265	1,678,990	1,114,966	548,103	(23,516)	(633,060)
	110%	2,896,538	2,335,730	1,773,722	1,210,038	643,790	73,229	(518,700)
	112%	2,990,896	2,430,195	1,868,454	1,305,060	739,276	169,723	(406,457)
	114%	3,085,255	2,524,660	1,963,064	1,399,953	834,718	265,971	(308,752)
	116%	3,179,613	2,619,125	2,057,653	1,494,845	929,988	361,999	(211,286)
	118%	3,273,972	2,713,590	2,152,242	1,589,714	1,025,258	457,905	(114,165)
	120%	3,368,270	2,808,003	2,246,832	1,684,446	1,120,346	553,626	(17,332)

This sensitivity table indicates that, based on the assumptions made, the scheme could weather a 15% increase in build costs while remaining viable. At a 30% increase in build costs, a 10% increase in sales values would be required to recover viability. This suggests that the site is likely to remain viable and deliverable across the plan period.

Persimmon Homes Wessex have submitted a representation in relation to the site. They raise concerns around the impact of the councils' Net Zero Carbon aspirations, suggesting the viability evidence is not adequate. The costs included in the viability assessment for net zero carbon buildings are based on robust evidence prepared by Bioregional and Currie and Brown (examination library reference ITV04, page 59).

Persimmon have noted that the infrastructure costs included in the assessment are lower than anticipated, risking overstating the scheme's capacity to fund infrastructure. The promoter was invited to participate in consultation and was offered the opportunity to present their view on costs. Although a cost of £56,563 (Table 9.3) is towards the lower end of the range of costs applied for the strategic sites (Tables 9.2 and 9.3), it is within the range of typical allowances. The £18,128,538 (Table 9.3) surplus identified in the appraisals (£29,052 per dwelling) suggests that even in the event costs are more closely aligned to the other strategic sites, this will not render the scheme unviable.

The Persimmon representation requests that the previous affordable housing target of 35% is retained and that a higher target is not justified. However, the viability report explains how the policy target is taken into account in the viability modelling, alongside the cumulative impact of the wider policy requirements. The viability report explains how the cumulative impact of emerging policies is dealt with (page 20). A comprehensive policies matrix was used to determine the policies with a direct impact on viability and to ensure that costs were allowed for in the modelling.

A criticism of the viability modelling relates to the fact that this site allocation is tested based on the values associated with the Medium Value Zone while it is located in the Low Value Zone, as defined in the Viability Report (page 55). AspinallVerdi, after

engagement with the LPA in relation to the specific characteristics of Grove, considered it would be more appropriate to test the scheme based on Medium Values. This approach was in recognition that, although the site is located within the broadly Low Value Zone, new sales values in Grove are expected to exceed the wider Low Value Zone and be more closely aligned with those set for the Medium Value Zone.

In light of these points, we remain of the opinion that the development proposed at Land North West of Grove, including the mix of uses on the site, is viable and deliverable over the plan period.

Q7.2.11 (AS8) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at North West of Grove.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS8 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan and the Joint Design Guide (examination library reference DBE01). The masterplan is to be prepared collaboratively with Vale of White Horse District Council and in consultation with Oxfordshire County Council, submitted with the first planning application, and used to guide subsequent proposals. This provides the principal mechanism for coordinating the distribution of uses, movement, green infrastructure, connections with surrounding development and the sequencing of infrastructure provision.

Policy AS8 also requires all necessary infrastructure identified through up-to-date evidence to be provided, including education provision, transport mitigation measures, public transport improvements, walking and cycling connections, Public Rights of Way improvements, green infrastructure and biodiversity enhancements.

Policy IN1 states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for North West of Grove are identified through the Infrastructure Delivery Plan (examination library reference LPA17, page 25) and will

be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS8) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the projected timescale and rate of development are realistic, as set out on page 78 of the Vale of White Horse Housing Land Supply Statement (examination library reference LPA98). Pages 76 and 77 of LPA98 set out the conclusions reached in respect of the development trajectory for the site, with the key conclusions being:

- The lead time is based on the outline application being consented by April 2027. We have then used district average lead in times for sites of this size to estimate when homes would be delivered, which is 2.4 years (28.5 months) from outline consent issued to first completions. Persimmon Homes advised that they expect the first homes to be delivered in monitoring year 2027/28. Whilst the site promoter has previously indicated that the site could come forward more quickly, given that an application is still under consideration we consider it prudent to use the average lead in time in this case. We therefore anticipate first completions on this site in the 2030/31 monitoring year.
- The build out rate has been based upon the site promoter's anticipated build out rate, with 66 homes in the first year of delivery and 133 homes per annum following this. These delivery rates are in accordance with the district averages for sites of this size, with the average being 133 homes per annum, and therefore realistic.

Q7.2.13 (AS8) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q.7.2.2, Q7.2.4 and Q7.2.10 above, and explain why we consider the plan is sound.

Q7.2.14 (AS8) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording “in accordance with” in respect of the Infrastructure Delivery Plan does not appear in this policy.

Q7.2.15 (AS8) Are any modifications necessary in the interests of soundness?

Councils’ Response:

There are no modifications necessary in the interests of soundness for Policy AS8. The policy is supported by the evidence base, has been demonstrated to be deliverable through the Statement of Common Ground, and provides a clear and effective framework for determining planning applications and guiding the future development of the site. We therefore consider the policy to be justified, effective and consistent with national policy.

Policy AS9 – North West of Valley Park, Didcot

Q7.2.1 (AS9) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for North West of Valley Park (examination library reference LPA57, section 2, pages 2-3) details the background to the site allocation. The site forms part of the Didcot Garden Town and Science Vale area and was first allocated through Core Policy 15 of the Vale of White Horse Local Plan 2031 Part 1 (LPP1) (examination library reference ALP03) for approximately 800 homes.

The rationale for allocating the site was considered through the examination of LPP1. The Inspector found this site was in principle soundly based and deliverable (examination library reference LPA99, paragraph 127). The Inspector also found the overall strategy for distributing housing growth across the district to be soundly based (paragraph 59), which supports the allocation's role in meeting development needs.

In preparing the Joint Local Plan, we did not simply carry forward the Vale LPP1 allocation. The site was reassessed alongside reasonable alternatives through the JLP site selection process. The Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 64-66 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it.

The preferred option was to retain the existing allocation, subject to a new policy incorporating updated policy requirements and presentational changes. The allocation was therefore recommended to be retained in the Joint Local Plan.

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Q7.2.2 (AS9) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site area, boundary and capacity assumptions are justified and based on available evidence, having regard to site constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of LPP1 (examination library reference LPA99, paragraph 127) when it was first allocated for development. The plan was adopted by VOWH in December 2016. There has been no change in circumstances that have caused a need for a revision to the boundary or capacity assumptions.

In preparing the Joint Local Plan, and in particular the indicative concept plan for this site, we have considered a range of evidence relating to site constraints, infrastructure requirements and deliverability. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in response to Questions 7.2.4-7.2.7, 7.2.10 and 7.2.13.

As stated in the Statement of Common Ground for this site (examination library reference LPA57), it is common ground between us and the landowner that the policy is robust and soundly based.

The landowner's Regulation 19 representation supported the allocation of the site and raised a number of detailed comments on the policy. We confirmed our position in the councils' Response to Key Issues (examination library reference LPA48, pages 98-99). In response to the landowner's representation, we are proposing a minor modification to rename the site from "North West of Valley Park" to "Milton Fields".

[PROPOSED MODIFICATION] Policy AS9, Site name

~~North West of Valley Park~~ **Milton Fields**, Didcot

The developer from the adjacent Valley Park development also raised concerns about the delivery of pitches for Gypsies and Travellers on this site. We have submitted the Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (GTAA) executive summary 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. We can confirm that the North West of Valley Park site allocation is a suitable and sustainable location to meet some of this need (6-10 pitches). This is a large allocation with capacity to accommodate a range of residential uses, including pitch provision**,** as recognised in paragraph 4.53 of the Housing Requirement, Affordable Housing, and Gypsies, Traveller, and Travelling Show People Topic Paper (examination library reference TOP03.2).

Q7.2.3 (AS9) How have the mix of uses been determined?

Councils' Response:

The allocation contains a mix of uses comprising residential development, housing with care for older people, Gypsy and Traveller pitches, and supporting services and facilities to create a sustainable community.

The adopted LPP1 (examination library ALP03) established the principal residential element of the allocation at approximately 800 homes. Please see our response to Q7.2.1 for the background to this allocation and its reassessment through the Joint Local Plan process.

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 90 units on this site.

The requirement for Gypsy and Traveller pitch provision (6-10 pitches for this site), has been addressed through the Housing Requirement, Affordable Housing, and Gypsies, Travellers, and Travelling Show People Topic Paper (examination library reference TOP03.2, paragraphs 4.33-4.54).

Q7.2.4 (AS9) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS9, together with the relevant Plan-wide policies, are appropriate to address the potential adverse impacts arising from development of the allocation.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS9 assessment, pages 31-33). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS9 and the relevant Plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to Key Issues, (examination library reference LPA48, pages 97-99). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport/traffic

The transport implications of the allocation have been considered through our transport evidence base (including transport modelling (examination library reference ITV03 - Transport Modelling Report) and infrastructure planning (ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper)).

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.10.1-3.10.3) provides a site-specific assessment of active travel opportunities for the site. It identifies that the allocation lies within the western extent of Didcot Local Cycling and Walking Infrastructure Plan area, with routes providing good connections into central Didcot, as well as Steventon and Milton. The assessment also identifies transport safeguarding for the A4130 widening along the northern boundary of the allocation, together with future safeguarding at the south-western corner of the site for an active travel crossing of the A34 towards Milton Heights. The assessment identifies a good network of active travel connections running along the northern, eastern and western boundaries of the allocation, together with the safeguarded active travel route across the A34 to the south-west.

Policy AS9 provides for mitigation through a comprehensive package of sustainable transport and highway measures under part 2(d), supported by the wider infrastructure requirements for the allocation. The Infrastructure Delivery Plan (examination library reference LPA17) identifies transport infrastructure and mitigation as part of the infrastructure necessary to support North West of Valley Park. The allocation also benefits from existing and proposed active travel connections to Didcot, Milton and surrounding areas, together with safeguarding for future transport improvements identified through the transport evidence base. The Transport Assessment at application stage will establish the precise nature and extent of any necessary mitigation.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS9 assessment, pages 31-33) identifies minor positive effects overall in relation to sustainable travel. Eight bus stops, and several Public Rights of Way are close to the site, with frequent services to varied destinations. Whilst development of the site will increase travel demand, Policy AS9 provides for mitigation through high-quality walking and cycling infrastructure and other sustainable transport measures to support travel by means other than the private car.

Overall, we consider that the transport effects of the allocation have been assessed at an appropriate level for plan-making and that the policy safeguards provide an effective framework for mitigation. Please also see our response to Question 7.2.6 regarding the effects on the highway networks.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS9 assessment, pages 31 - 33) predicts minor negative effects in relation to pollution at North-West of Valley Park, particularly during the construction phase when noise and air pollution could potentially affect nearby residents to the north.

The major railway line to Didcot is likely to be the main noise source for both existing and new residents. Additionally, the nearby A4130 and A34 could serve as noise and air pollution sources, affecting residents to the north and south-west of the site.

A small area in the south-east corner of the site falls within Dark Skies Zone E2. Here there is an increased risk of light pollution effects. The site also falls within an area of low tranquillity.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the Plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land. Policy AS9 also requires development proposals to demonstrate that noise impacts from the existing railway line have been assessed, and any necessary mitigation measures have been implemented to provide an adequate buffer.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and Plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS9 assessment, pages 31 -33) predicts negligible adverse effects on biodiversity, noting that boundary hedgerows may support protected / notable species which could be impacted by the works. The site is not within any international, national, or local ecological designation.

Policy AS9 requires development proposals to demonstrate how the site will contribute towards biodiversity net gain and redressing the identified green infrastructure deficit in the area surrounding Didcot, whilst also meeting the plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River

Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the council's (examination library reference LPA47, paragraphs 3.1 – 3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS9 assessment, pages 31-33) identifies negligible adverse effects in relation to landscape. The site falls within 2 km (1900 m at the nearest point) of the North Wessex Downs National Landscape. However, given the location of the site, topography, and the surrounding intervening major roads, adverse landscape effects are considered unlikely. The extent of any more localised landscape and visual effects will be dependent on the scale, layout and massing of the development coming forward.

Policy AS9 follows a landscape-led approach, requiring new green infrastructure and a design that responds to the most up to date landscape evidence in part 2(k) and 2(l). Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that the policies of the plan provide an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS9 assessment, pages 31-33) identifies neutral effects in relation to the historic environment for North-West of Valley Park. The site is located further than 500 m from any nationally designated heritage assets, further than 100 m from any locally designated heritage assets, and further than 300 m from a Conservation Area.

Policy AS9 does, however, require development proposals to demonstrate how the site will act as a gateway to Didcot, carefully considering the uses on the frontage of the A4130.

The Joint Local Plan Heritage Impact Assessments (examination library reference NHL03, pages 3–8) provide the updated JLP-wide methodology for heritage impact assessment and confirm that earlier Local Plan heritage evidence forms part of the evidence base for previous strategic allocations (page 6).

Flood risk and water management

In relation to water quality and wastewater infrastructure, the Environment Agency raised concerns regarding wastewater treatment capacity (examination library reference LPA48, page 98). Since submission of the plan, we have completed the Water Cycle Study Detailed Report (examination library reference LPA46) and agreed a Statement of Common Ground with the Environment Agency (examination library reference LPA67). The Statement of Common Ground confirms that AS9 would drain to Didcot Sewage Treatment Works, and further improvement schemes are required to support short term growth in the JLP.

The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.6) identifies AS9 as one of the JLPs allocations draining to Didcot Sewage Treatment Works. The study identifies that existing dry-weather flow is exceeding the current permitted level, but this is an identified infrastructure requirement rather than a constraint that prevents the allocation from coming forward. Policy CE8 provides the mechanism for aligning development with sufficient new or upgraded wastewater infrastructure, including through phasing where necessary.

The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS9 Site Assessment) provides a detailed site-specific assessment of flood risk and identifies the mitigation and further assessment required as development comes forward. This includes a drainage strategy, investigation of the potential use of infiltration sustainable drainage systems, and consideration of opportunities for natural flood management measures to reduce flood risk to the site and surrounding areas. In response to the assessment and discussions with the Environment Agency, we are proposing a modification to part 2(p) of Policy AS9 to clarify the approach to development within Flood Zones 2 and 3 and provides a clear framework for avoiding development within areas at greatest risk and for investigating and appropriately mitigating surface water flooding to the north of the site (see responses to Q7.2.15). The Statement of Common Ground confirms that the proposed modification addresses the Environment Agency's soundness concerns and that there are no outstanding flood-risk soundness concerns relating to the allocation.

Taken together, Policy AS9, the relevant Plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS9) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is required to pass the Exception Test as it is proposed for a more vulnerable use (housing) and that a very small part of the site is located in Flood Zone 3a, albeit no housing is proposed in that part.

Q7.2.6 (AS9) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper, and TOP08.2 - Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, Policy AS9 (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in OCC's Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS9) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS9 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of North West of Valley Park. A summary of the key infrastructure requirements is provided in Section 5 of the IDP (pages 23-24), with detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing set out in Appendix 2.8: Infrastructure Requirements for North West Valley Park (Policy AS9).

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the IDP.

The infrastructure requirements identified in the IDP are reflected directly in Policy AS9:

- Part 2(c) requires sufficient education capacity, likely to be provided through one on-site primary school (including early years provision), or an equivalent financial contribution off-site, together with contributions towards secondary and SEND provision.
- Part 2(d) requires all necessary infrastructure based on up-to-date evidence and identifies a comprehensive package of transport mitigation measures, including contributions towards the Didcot Garden Town HIF1 scheme, active travel improvements, public transport enhancements and highway infrastructure.
- Part 2(g) and 2(h) require the provision of a neighbourhood centre and community centre.
- Part 2(i) and 2(j) require public open space, recreational facilities and contributions towards sports provision.
- Part 2(k), 2(l) and 2(m) require strategic landscaping, green infrastructure and biodiversity enhancements.
- Part 2(o) requires a Drainage Strategy and appropriate sewerage infrastructure provision.

Additionally, Policy LS1, which applies to AS9, requires at part 1(e) that development proposals ensure the provision of necessary supporting infrastructure, including social and community infrastructure. Developers must engage with relevant infrastructure providers to support the implementation of the IDP. Together with the requirements of Policy AS9, these provisions provide the framework for securing the infrastructure identified in the IDP.

The principal constraints relating to the allocation are the delivery of the infrastructure required to support growth, together with environmental considerations relating to flood risk, landscape sensitivity, biodiversity, wastewater infrastructure and noise from the adjacent railway line. These matters are addressed through the requirements of Policy AS9 and the relevant Plan-wide policies and will be considered further through the comprehensive masterplan required by part 2(a).

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a standard and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and available infrastructure capacity at the time development comes forward. The comprehensive masterplan required under part 2(a) will ensure that infrastructure provision and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements, indicative costs and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policy AS9 and Policy LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process having regard to the latest available evidence.

Q7.2.8 (AS9) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for North West of Valley Park (examination library reference LPA57). Paragraph 3.2 confirms that the site is under single ownership control and is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

There is clear evidence of promoter interest in bringing the site forward. Our latest five-year housing land supply statement (examination library reference 98, pages 67-69) confirms that the landowner has reached agreement with a promoter to progress the development of the site.

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would prevent the allocation from coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS9) How is it intended to bring the site forward for development?

Councils' Response:

The site promoter advises, through the latest five-year housing land supply statement (examination library reference 98, pages 67-69), that the site is intended to be brought forward through the submission of a hybrid planning application (expected by September 2027), followed by the phased delivery of development and supporting infrastructure. The promoter has indicated that development could be delivered through one or two developer outlets.

The statement also confirms that site surveys have been undertaken to inform masterplanning and transport proposals, with further design and technical work currently underway. The site promoter has also advised that formal pre-application discussions will commence shortly, followed by public consultation and the submission of a hybrid planning application within the next 12 months.

We are therefore satisfied that active work is underway to progress the site and that there is a clear route to the submission of a planning application and subsequent delivery of the allocation.

Q7.2.10 (AS9) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

The Viability Report (examination library reference ITV04) determined that this site had "marginal viability". In the Aspinall Verdi report, "marginal viability" means that the policy-compliant Residual Land Value is positive, but less than the notional Benchmark Land Value. This is in the context of Oxfordshire which is a very high market value area of the country. Whilst AspinallVerdi have found this site to be "marginal" in high-level viability modelling for Local Plan viability, it is fully anticipated that this scheme will be brought forward once detailed design and value engineering is carried out in respect of the required infrastructure (even if this means negotiations must take place on land values/profit margins).

Based on a Benchmark Land Value of £480,000 per net acre, the scheme generated a Residual Land Value of £305,118 per net acre (£228,838 per gross acre) (Table 9.3, page 104). Sensitivity testing concluded that the scheme could become viable at a reduced BLV of £300,000 per net acre / £215,000 per gross acre (page 106). In light of the typical infrastructure requirements relating to strategic land, this would often be deemed a reasonable allowance in the context of plan viability testing.

The site received an amber RAG rating for deliverability. Although details of the proposed masterplan were provided by the promoter, no information was provided on anticipated infrastructure costs, and no details were given in relation to land agreements. Although greater certainty would be welcome on the land position, the lack of evidence provided here also means that there is nothing to suggest that the site could not be secured based on the RLV generated by the appraisals.

AspinallVerdi have provided the following sensitivity scenario for the site. This draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a loss of minus £174,882 per net acre, as concluded in the original report (examination library reference ITV04, Table 9.3):

				Build Costs	105 = 5% increase			
Balance (RLV - BLV £ per acre (n))	(174,882)	55%	70%	85%	100%	115%	130%	145%
	90%	485,894	201,678	(83,291)	(369,944)	(691,435)	(1,232,551)	(3,833,009)
	92%	524,575	240,404	(44,465)	(330,844)	(644,618)	(1,006,087)	(3,416,131)
Market Values	94%	563,255	279,130	(5,666)	(291,797)	(598,153)	(953,330)	(2,999,252)
100%	96%	601,935	317,857	33,134	(252,783)	(551,946)	(901,508)	(2,582,373)
(105% = 5% increase)	98%	640,615	356,564	71,931	(213,824)	(505,956)	(851,678)	(2,165,495)
	100%	679,295	395,264	110,690	(174,882)	(462,730)	(803,105)	(1,748,616)
	102%	717,976	433,964	149,449	(135,983)	(423,412)	(755,354)	(1,331,737)
	104%	756,656	472,664	188,209	(97,084)	(384,178)	(708,185)	(1,072,128)
	106%	795,336	511,364	226,968	(58,236)	(345,008)	(661,420)	(1,019,371)
	108%	834,016	550,064	265,716	(19,390)	(305,908)	(614,961)	(967,110)
	110%	872,696	588,764	304,443	19,456	(266,856)	(568,739)	(916,733)
	112%	911,376	627,464	343,169	58,259	(227,830)	(522,692)	(867,686)
	114%	950,057	666,164	381,896	97,058	(188,861)	(477,101)	(819,535)
	116%	988,727	704,858	420,622	135,857	(149,902)	(437,712)	(772,007)
	118%	1,027,394	743,538	459,348	174,656	(110,982)	(398,438)	(724,936)
	120%	1,066,061	782,218	498,075	213,420	(72,083)	(359,232)	(678,222)
	122%	1,104,728	820,898	536,793	252,179	(33,184)	(320,073)	(631,768)
	124%	1,143,395	859,579	575,493	290,939	5,665	(280,973)	(585,531)
	126%	1,182,062	898,259	614,193	329,698	44,511	(241,915)	(539,459)
	128%	1,220,729	936,939	652,893	368,458	83,357	(202,888)	(493,525)
	130%	1,259,396	975,619	691,593	407,208	122,183	(163,897)	(452,058)

This table demonstrates that an uplift in values of 10% would be sufficient to achieve viability at the adopted BLV. With an increase in build costs of 15%, values would need to increase by 24% to achieve a viable position based on the adopted BLV. Were a lower land value acceptable, the scheme would obviously be more resilient to market forces.

No representations have been submitted to indicate that there are issues with the viability analysis or overall conclusions for this site. Although the market is currently challenging, we are of the opinion that over the plan period and based on the mix of uses proposed, North West of Valley Park will be viable and deliverable.

Q7.2.11 (AS9) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at North West of Valley Park.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS9 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan and the Joint Design Guide (examination library reference DBE01). The masterplan is to be prepared collaboratively with Vale of White Horse District Council and in consultation with Oxfordshire County Council, submitted with the first planning

application, and used to guide subsequent proposals. This provides the principal mechanism for coordinating the distribution of uses, movement, green infrastructure, connections with surrounding development and the sequencing of infrastructure provision.

Policy AS9 also requires all necessary infrastructure identified through up-to-date evidence to be provided, including education provision, transport mitigation measures, public transport improvements, walking and cycling connections, Public Rights of Way improvements, green infrastructure and biodiversity enhancements.

Policy IN1 states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for North West of Valley Park are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 23-24) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS9) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the projected timescale and rate of development are realistic, as set out on page 69 of the Vale of White Horse Housing Land Supply Statement (examination library reference LPA98). Pages 68 - 69 of LPA98 set out the conclusions reached in respect of the development trajectory for the site, with the key conclusions being:

- The lead time is based on a hybrid application being submitted by the September 2027, as advised by the site promoter. We have then used district average lead in times for sites of this size to estimate when homes would be delivered, which is 6.8 years (81.2 months) from application submission to first completions. The site promoter advised that they expect the first homes to be delivered in monitoring year 2028/29. Whilst we consider this timetable could be achievable, given that an application has not yet been submitted we consider it prudent to use the average lead in time in this case. We therefore project the first homes coming forward in the 2035/36 monitoring year.
- The build out rate has been based upon the site promoter's anticipated build out rate, with 60 homes in the first year of delivery and 120 homes per annum following this. These delivery rates are in accordance with the district averages for sites of this size, with the average being 133 homes per annum, and therefore realistic.

Q7.2.13 (AS9) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q.7.2.2, Q7.2.4 and Q7.2.10 above, and why we consider the plan is sound, and explain why we consider the plan is sound or that a main modification is needed (see Q7.2.15).

Q7.2.14 (AS9) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording "in accordance with" in respect of the Infrastructure Delivery Plan does not appear in this policy.

Q7.2.15 (AS9) Are any modifications necessary in the interests of soundness?

Councils' Response:

Yes. Following discussions with the Environment Agency and the preparation of the Statement of Common Ground (examination library reference LPA67), we propose a modification to part 2(p) of Policy AS9 to ensure consistency with national planning policy and the updated flood risk evidence, as below:

[PROPOSED MODIFICATION] Policy AS9, Part 2(p)

> p) that there is no development within Flood Zones 2 and 3 **or the design flood extent (1% AEP plus an appropriate allowance for climate change)**, other than essential infrastructure **that is demonstrated to have passed the Exception Test (where this is required by national policy)** and green infrastructure **that has been demonstrated to not increase flood risk elsewhere**, and that surface water flooding to the north of the site has been investigated and appropriately mitigated.

Policy AS10 – Land at Dalton Barracks Garden Village, Shippon and Policy AS14 – Dalton Barracks Garden Village

Q7.2.1 (AS10) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Dalton Barracks (examination library reference LPA58, section 2, pages 2-5) details the background to the site allocation.

An area of the site was first allocated in the Vale of White Horse Local Plan part 2 2031 (LPP2), by Core Policy 8b: Dalton Barracks Strategic Allocation, with provision of around 1,200 dwellings to be delivered within the plan period up to 2031. The majority of the LPP2 allocated site (including part of Abingdon Airfield) was removed from the Oxford Green Belt, along with the built-up area of the barracks. Part of the LPP2 allocated site area contains an area of land remaining within the Green Belt, with development on this area limited to Green Belt compatible uses, including parkland – located on the western and northern sides of the site, to be planned for as part of overall masterplanning for the site. The remainder of the former Abingdon Airfield still lies within the Oxford Green Belt.

The built up area of the Barracks (along with the village of Shippon), whilst removed/inset from the Green Belt by the LPP2, was not allocated for development.

The submission version of the LPP2 sought to remove a larger area of the Dalton Barracks/Abingdon Airfield site from the Green Belt, allocate for 1,200 homes with recognition of a potential total capacity of in excess of 4,000 homes. However, the Local Plan Inspector (examination library reference LPA100, paragraphs 34-55) concluded that main modifications were needed to ensure the plan was sound. The inspector stated that there "is no comprehensive evidence base that the whole area is developable and able to satisfactorily accommodate a new settlement of up to 4,500 dwellings in the long term". As such, the policy wording was modified, and consequential policies map changes were made to remove the area proposed to be removed from the Green Belt and the reduce the extent of the policy allocation for development.

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

Paragraph 2.19 of TOP07.1 states that through the preferred options we also considered if there were additional well located brownfield sites [in accordance with

an objective of the Joint Local Plan] that needed allocation (i.e. would not be policy compliant if brought forward as a windfall application). This led to us extending the Dalton Barracks allocation from 1,200 to 2,750 homes.

TOP07.1 pages 67-70 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for this site – i.e. whether to expand the allocation, retain the existing allocation or deallocate it.

The preferred option was to increase the site area of the allocation at Dalton Barracks to include the brownfield part of the barracks to the east of the existing site. This will increase the number of homes from 1,200 to 2,750; and the allocation was "recommended to be retained and extended in the Joint Local Plan".

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

The site promoter's representations made suggestions about extension of the allocation including the removal of additional land from the Green Belt, as summarised in the councils' Response to Key Issues (examination library reference LPA48, page 101). We do not consider expanding the Joint Local Plan 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. Expansion of the proposed allocation was not compliant with the criterion (b ii), as this would involve releasing land from the Green Belt, detailed in paragraph 2.40 of TOP07.1. As such it was not considered as a reasonable alternative.

Q7.2.2 (AS10) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

As stated in paragraph 2.20 of the Statement of Common Ground for this site (examination library reference LPA58), the site promoters have progressed pre-application engagement. A Planning Performance Agreement is also now in place. It is common ground between us and the promoters (see paragraphs 3.6 and 3.11)

that the site will deliver approximately 2,750 new homes and associated non-residential uses and that the policy is robust and soundly based.

The site promoter's Regulation 19 representations requested that land to the south and east of the site be safeguarded to enable sustainable access and travel solutions for the site. This is reported in the councils' Response to Key Issues examination library reference LPA48, page 101. Our response in LPA48 (page 101, response 6a) is that 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.

Furthermore, Paragraph 110(c) of the NPPF (examination library reference LNP01, page 31) allows safeguarding only where there is a site-specific requirement supported by robust evidence. In relation to Dalton Barracks, we and the County Council do not consider that robust evidence has been provided by the site promoter to justify additional transport safeguarding. Consequently, there is currently no evidential basis to support a safeguarding requirement, and we therefore maintain that the submitted Plan remains sound.

Within their representations the site promoter raised concerns with the requirements for Suitable Alternative Natural Greenspace (SANG), at paragraph 5.6.11 stating that "the requirement to provide SANG is unnecessary as the planned open space, areas for biodiversity enhancement, nature recovery and new landscaped open space will adequately address the requirements to mitigate any such impacts on the Cothill Fen SAC and nearby SSSIs". Our response in LPA48 (page 101, response 6a) is that we consider that the "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).

We are content to call this provision something different rather than SANG, but we do not consider this to be a soundness matter.

Paragraph 3.30 of the Statement of Common Ground (examination library reference LPA58), states that the "parties agree to ensure that there will be no adverse effect on the integrity of the Cothill Fen SAC: this will be achieved through the provision of mitigation measures against recreational disturbance". It is our view that the parkland is capable of providing this mitigation and hence it is a requirement of the policy.

Their representation also raised concerns about the delivery of pitches for Gypsies and Travellers. We confirmed our position that this site is a suitable and sustainable location to meet some of this need (6-10 pitches) in the councils' Response to Key Issues (examination library reference LPA48, page 101, response 6d). This is a large allocation with capacity to accommodate a range of residential uses, including pitch provision**,** as recognised in paragraph 4.53 of the Housing Requirement, Affordable Housing, and Gypsies, Traveller, and Travelling Show People Topic Paper (examination library reference TOP03.2).

Q7.2.3 (AS10) How have the mix of uses been determined?

Councils' Response:

As a garden village, the allocation contains a mix of uses – these are primarily a range of residential uses (including older persons accommodation and Gypsy and Traveller pitches), employment and supporting services and facilities to make a sustainable garden community.

The Vale of White Horse Local Plan 2031 Part 2 established the residential number of approximately 1,200 units and the employment amount was unqualified. Please see our response to Q7.2.1 for the background to these uses and their reassessment.

The expanded site area allows for additional residential numbers, approximately 2,750 homes. As set out in the Statement of Common for Daton Barracks (examination library reference LPA58), paragraph 3.6, it is common ground between the councils' and the promoters that there is capacity on the AS10 site to deliver approximately 2,750 new homes and associated non-residential uses.

We also considered it important for the effectiveness of delivering a sustainable garden village that there is a quantified amount of employment stated within the policy. The promoter has raised this matter in their Regulation 19 representations and are seeking a modification to replace the quantum (7.4 hectares) with a reference to "a range of employment options".

The potential options for the quantum of employment are set out in the document; Employment Potential at Dalton Barracks (examination library reference HES09). The Employment Needs Topic Paper (examination library reference TOP02.2), paragraphs 3.54-3.61, summarises this and then in paragraphs 4.13-4.14 sets out the justification for choosing approach 2, that being for 7.4 hectares.

The Joint Housing Needs Assessment (examination library reference HES15.1, figures 107 and 108) sets out the need for specialist older person housing, and Policy HOU5 states the sites that meet this need. This includes 180 units on this site.

The requirement for Gypsy and Traveller pitch provision (6-10 pitches for this site), has been addressed through the Housing Requirement, Affordable Housing, and Gypsies, Travellers, and Travelling Show People Topic Paper (examination library reference TOP03.2, paragraphs 4.33 – 4.54).

Q7.2.4 (AS10) 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?

Councils' Response:

Yes, the safeguards and mitigation contained within Policies AS10, together with the relevant Plan-wide policies, are appropriate to address the potential adverse impacts arising from development of Land at Dalton Barracks Garden Village, Shippon.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS10 assessment, pages 34-37). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS3 and the relevant Plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to the Key Issues, (examination library reference LPA48, pages 99-102). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport/traffic

The transport implications of the allocation have been considered through our transport evidence base (including transport modelling (examination library reference ITV03, Transport Modelling Report) and infrastructure planning (ITV02, Study of Active Travel for Allocations, LPA17 Infrastructure Delivery Plan, TOP10.2 - Transport Safeguarding Topic Paper)). The Transport Modelling Report (examination library reference ITV03) assesses the cumulative traffic impacts arising from growth proposed through the Joint Local Plan and tests relevant mitigation schemes to ensure that those impacts can be appropriately managed.

The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.11.1-3.11.14) considers the existing and planned active travel network serving the allocation and opportunities to improve walking and cycling connections to surrounding settlements and the wider network. Policies AS10 and AS14 provide the framework for mitigating the transport effects of development through sustainable transport measures, including improvements to walking, cycling and public transport infrastructure. The wider transport evidence also provides the basis for identifying the necessary highway and sustainable transport infrastructure and for determining detailed requirements as the development progresses through masterplanning and the planning application process. A Transport Assessment at the planning application stage will establish the precise form and timing of the necessary mitigation. This allows the detailed transport package to respond to the scale, phasing and form of development ultimately proposed.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS10 assessment, pages 34-37) identifies minor positive effects overall in relation to sustainable travel. The site is moderately well-located, with six bus stops

within walking distance (albeit with only one low frequency service to nearby town centres). Two Public Rights of Way are also within walking distance of the site. Policy AS10 provides for mitigation through high-quality walking and cycling infrastructure, although the site's proximity to the A-road network may encourage some private car use.

The Transport Assessment at application stage will establish the precise nature and extent of any necessary mitigation.

The site promoter's representations sought additional transport safeguarding – we deal with this matter in our response to Question 7.2.2.

Overall, we consider that the policy provisions provide an effective framework for mitigation of the identified transport impacts. Please also see our response to Question 7.2.6 regarding the effects on the highway networks.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS10 assessment, pages 34 - 37) predicts negligible adverse effects in relation to pollution at Dalton Barracks Garden Village, particularly during the construction phase when noise and air pollution could potentially affect nearby residents in Shippon.

The site is not in close proximity to any major sources of air or noise pollution. The western half of the site falls within Dark Skies Zone E1 and although much of this is proposed for green infrastructure, there remains some risk of light pollution effects.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the Plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and Plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS10 assessment, pages 34-37) predicts major adverse effects on ecology, due to the site's location directly adjacent to the Dry Sandford Pit SSSI and 375 m from the Cothill Fen SAC & SSSI. One small stand of Ancient Woodland is also situated on the northern side of Honeybottom Lane.

Air pollution and recreational disturbance to these designated sites are possible, although the SA acknowledges that the indicative concept plan and green infrastructure buffer therein provide potential for limiting the magnitude of these impacts. The whole area to the north and west of the site is designated as a conservation target area where targeted conservation action will have the greatest benefit, and habitat creation as part of the proposals will provide connectivity to this area. (Please note that following the completion of the SA conservation target areas have been replaced by the LNRS, please see our response to Q16.1.9 regarding this matter).

Policy AS10 requires development proposals to demonstrate how the site will contribute towards biodiversity net gain and the policy stipulates that development cannot have adverse effects on protected sites. New development must also meet the plan-wide requirements of Policy NH2.

The Habitats Regulations Assessment Appropriate Assessment (December 2024) (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects. Of these impact pathways, the AA report concluded that only recreational disturbance impacts had the potential to result in likely significant effects to the Cothill Fen Special Area of Conservation (SAC) in the absence of mitigation. However, adverse effects to integrity were subsequently discounted in light of provisions within Policy AS10 to mitigate the effects of recreational disturbance, through the provision of suitable alternative natural greenspace, in the form of parkland.

Atmospheric pollution was also included as a possible impact pathway within the AA report but due to ongoing discussions with Natural England about the scope of traffic and air quality modelling, the AA did not draw any conclusions about the potential for adverse atmospheric pollution effects.

Further screening did identify the potential for likely significant effects at Oxford Meadows, Cothill Fen and Aston Rowant SACs arising from atmospheric pollution and these sites were therefore taken forward for Appropriate Assessment. However, taking account of a variety of factors, including the over-prediction of effects associated with all traffic growth, adverse effects to the integrity of all three SACs were subsequently ruled out in the HRA Appropriate Assessment Addendum (examination library reference LPA43) paragraphs 5.2.1–5.2.4, page 48). Natural England agrees with the HRA conclusions in their Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1-3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement. Please also see our response to Q7.3.5 regarding the site's proximity to protected habitats

sites and related designations, which addresses the representation made on this matter.

Landscape and countryside

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS10 assessment, pages 34-37) identifies neutral effects in relation to landscape. The site is located further than 2 km from any National Landscape and adverse effects to designated landscapes are therefore unlikely. The extent of any more localised landscape and visual effects will be dependent on the scale, layout and massing of the development coming forward.

Policy AS14 requires a landscape-led approach, requiring considering landscape first in the masterplanning process and using it to steer the layout of the development. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that the policies of the plan provide an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS10 assessment, pages 34-37) identifies minor adverse effects in relation to the historic environment for Dalton Barracks Garden Village. The site is within 500m of 14 Grade II Listed Buildings, so there is potential for impacts to their settings. Listed Buildings to the north in Cothill are less likely to suffer heritage impacts, given the natural intervening vegetation and proposed areas of green infrastructure to the north.

The Joint Local Plan Heritage Impact Assessments (examination library reference NHL03, pages 9–19) provide an assessment of the heritage assets relevant to the AS10 allocation.

Policy AS10 requires development proposals to demonstrate that existing buildings and monuments, where possible, are retained and re-used to give context and interest to the site, particularly where these are of heritage significance. We considered this, along with the heritage policies in the plan, address the concerns raised in representations.

Flood risk and water management

The updated flood-risk evidence provides a detailed site-specific assessment of Dalton Barracks Garden Village, including the relevant sources of flood risk and the measures and further assessment necessary to manage any identified risks. The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS10 site assessment) provides the site-specific assessment and identifies the requirements to be addressed as development comes forward. It confirms that

the site is not required to pass the exception test because it is not within Flood Zone 3a and vulnerable development is expected to avoid the functional flood plain. It concludes that the site can be allocated, and a site-specific Flood Risk Assessment will be required to establish existing and future flood risk from Sandford Brook and inform the detailed design of the development.

Dalton Barracks Garden Village straddles the catchments of Abingdon and Appleton Sewage Treatment Works. The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.1-4.3.2) takes a precautionary approach, testing scenarios in which the development drains entirely to either works to ensure the potential impacts are not underestimated. The assessment identifies greater capacity constrains if the development were to drain fully to Appleton STW, but notes Abingdon has sufficient headroom to accommodate future development when both Abingdon outfalls are considered together.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the proposed modification to Policy AS10 addresses the Environment Agency's soundness concern and that there are no outstanding flood-risk soundness concerns relating to the allocation (see our response to Q7.2.15, where this modification is set out). The Environment Agency also confirms that there is no reason to believe the development is undeliverable, subject to detailed modelling of Sandford Brook as recommended by the Strategic Flood Risk Assessment.

In addition, the plan-wide requirements of Policy CE8 provide the framework for development to be coordinated with the wastewater infrastructure necessary to serve it. The detailed requirements can therefore be established through the planning application process, informed by the latest position on infrastructure capacity and necessary improvements.

We therefore consider that the flood-risk and water-management effects of the allocation have been appropriately assessed and that the identified issues do not prevent the allocation from being developed. The evidence and plan-wide policy framework provide an appropriate basis for securing any necessary detailed flood-risk, drainage and wastewater infrastructure mitigation as development comes forward.

Q7.2.5 (AS10) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference

TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is required to pass the Exception Test as it is proposed for a more vulnerable use (housing) and that a very small part of the site is located in Flood Zone 3a, albeit no housing is proposed in that part.

Q7.2.6 (AS10) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03, Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library reference ITV01, Existing Transport Conditions Report, ITV02, Study of Active Travel for Allocations, LPA17, Infrastructure Delivery Plan, TOP10.2 , Transport Safeguarding Topic Paper, and TOP08.2, Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued"

in accordance with paragraph 108(c) of the NPPF. Mitigation requirements include walking and cycling infrastructure, with specific reference to the Abingdon Local Cycling and Walking Infrastructure Plan (LCWIP, which can be found here, this forms part of the Local Transport and Connectivity Plan, examination library reference LNP10, pages 38-40) as well as provision for public transport.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in Oxfordshire County Council's Strategic Planning Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Please also see our response to Q7.2.2 regarding a representation requesting additional safeguarding.

Q7.2.7 (AS10) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS10 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Land at Dalton Barracks Garden Village, Shippon. A summary of the key infrastructure requirements is provided in Section 5 of the IDP (pages 21-22), with detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing set out in Appendix 2.9: Infrastructure Requirements for Land at Dalton Barracks Garden Village, Shippon (Policy AS10).

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site

infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the IDP.

Policy AS10 highlights the main infrastructure requirements of this site:

- Part 1 requires healthcare provision and local centres
- Part 2(i) requires sufficient education provision, including two new on-site primary schools, a site and funding for a secondary school and contributions to SEND provision.
- Part 2(j) requires all necessary transport infrastructure and mitigation measures to support the development.
- Part 2(k) requires the delivery of leisure provision, including football and cricket playing pitches, MUGA and a skatepark.
- Part 2(l) requires the provision of a new library on site, or contributions towards library provision in the area.
- Part 2(m-t), require landscaping, parkland, green infrastructure provision, defensive planting and biodiversity enhancements across the site.

Additionally, Policy LS1, which is applicable to Land at Dalton Barracks Garden Village, requires in part 1e that development proposals must ensure that necessary supporting infrastructure is provided, including social and community infrastructure. Developers must engage with relevant infrastructure providers to ensure the implementation of the IDP. Together with the other requirements of Policy AS10, these provisions provide the framework for securing the infrastructure identified in the IDP.

The physical constraints relating to the allocation are the need to provide sufficient infrastructure capacity to support growth, together with environmental considerations primarily relating to the proximity of habitats sites. These matters are addressed through the requirements of Policy AS10 and will be considered further through the comprehensive masterplan required by part 2 (criterion b) and the project level HRA requirement by part 2 (j)(xviii). Please also see our response to Q7.3.5 regarding the implications of the site's proximity to protected habitats sites and related designations.

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a standard and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan

will ensure that infrastructure provision and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policy AS10 and LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process having regard to the latest available evidence.

Q7.2.8 (AS10) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common for Daton Barracks (examination library reference LPA58). Paragraph 2.22 confirms that the site is in single landownership, and paragraph 3.2 confirms that it is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

As explained in the latest Housing Land Supply Statement for Vale of White Horse District Council (examination library reference LPA98, page 88), the Ministry of Defence (MOD) is the sole owner of the site and it is being promoted by their Defence Infrastructure Organisation (DIO).

There is clear evidence of promoter interest in bringing the site forward. Our latest five-year housing land supply statement (examination library reference LPA98, pages 87-92) includes the site within the anticipated housing supply trajectory and confirms our expectation that it will contribute towards housing delivery during the plan period. This is supported by the Statement of Common Ground which confirms the ongoing partnership between the councils' and the site promoter to facilitate delivery of the allocation and records extensive pre-application engagement and technical work undertaken by the site promoter (paragraphs 2.19-2.26 and 5.2).

We are therefore satisfied that there is a clear landownership position, active promotion of the site and no landownership or developer interest issues that would prevent the allocation from being capable of coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS10) How is it intended to bring the site forward for development?

Councils' Response:

The site promoter advises, through the latest five-year housing land supply statement (examination library reference LPA98, pages 87-92), that the site is expected to come forward through the submission of either an outline or hybrid planning application in the winter of 2027/28.

Policy AS10 – Land at Dalton Barracks Garden Village, Shippon and Policy AS14 – Dalton Barracks Garden Village

The Statement of Common for Daton Barracks (examination library reference LPA58) confirms that preparatory work has already been undertaken to support the development of the site. This includes public and stakeholder engagement, along with pre-application discussions with VOWH and Oxfordshire County Council.

It also confirms (paragraphs 2.16 and 2.17) that the DIO is likely to appoint a development partner, to ensure that the necessary detailed planning permissions are achieved to enable the implementation of a comprehensive scheme through its various development phases and to achieve garden village design principles on this strategically important site.

The Statement of Common Ground further confirms that the parties are committed to ongoing partnership working to ensure the optimum outcome for the site that delivers new residential development in a sustainable location (paragraph 2.23).

We are therefore satisfied that active work is underway to progress the site and that there is a clear route to the submission of a planning application and subsequent delivery of the allocation.

Q7.2.10 (AS10) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

(Please see Appendix 1 of Matter 7, which provides an introduction to the mix of uses and market conditions for relevant site allocations in relation to viability).

The Viability Report (examination library reference ITV04) determined that this site had "marginal viability". In the AspinallVerdi report, "marginal viability" means that the policy-compliant Residual Land Value is positive, but less than the notional Benchmark Land Value. This is in the context of Oxfordshire which is a very high market value area of the country. Whilst AspinallVerdi have found this site to be "marginal" in high-level viability modelling for Local Plan viability, it is fully anticipated that this scheme will be brought forward once detailed design and value engineering is carried out in respect of the required infrastructure (even if this means negotiations must take place on land values/profit margins).

Based on a Benchmark Land Value of £540,000 per net acre, the scheme generated a Residual Land Value of £509,985 per net acre (£214,570 per gross acre) (Table 9.3, page 104). Sensitivity testing concluded that the scheme could become viable at a reduced BLV of £500,000 per net acre (circa £200,000 per gross acre) (page 106).

Although marginal, the site received a green RAG rating for deliverability. Given the site is in the control of a public-sector organisation, the DIO, it was assumed that a relatively minor reduction in the land value premium could be absorbed to enable viable delivery of the site. Such a reduction would also render the scheme viable in financial terms. On this basis, the site was broadly considered viable and deliverable.

The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a loss of minus £30,015 per net acre, as concluded in the original report (examination library reference ITV04, Table 9.3):

				Build Costs 105 = 5% increase				
Balance (RLV - BLV £ per acre (n))	(30,015)	55%	70%	85%	100%	115%	130%	145%
	90%	861,434	449,971	36,873	(379,652)	(848,855)	(1,381,393)	(3,643,597)
	92%	930,623	519,265	106,396	(309,516)	(764,887)	(1,289,645)	(2,955,640)
Market Values	94%	999,812	588,558	175,900	(239,505)	(681,523)	(1,198,343)	(2,284,952)
100%	96%	1,069,002	657,828	245,336	(169,589)	(598,621)	(1,108,934)	(1,663,976)
(105% = 5% increase)	98%	1,138,183	727,064	314,772	(99,750)	(519,341)	(1,021,277)	(1,570,366)
	100%	1,207,334	796,301	384,178	(30,015)	(448,606)	(934,906)	(1,477,415)
	102%	1,276,486	865,538	453,538	39,692	(378,089)	(849,593)	(1,385,084)
	104%	1,345,638	934,774	522,898	109,310	(307,742)	(765,151)	(1,293,255)
	106%	1,414,789	1,004,011	592,258	178,923	(237,536)	(681,353)	(1,201,762)
	108%	1,483,941	1,073,204	661,567	248,445	(167,441)	(598,048)	(1,111,692)
	110%	1,553,092	1,142,394	730,861	317,967	(97,476)	(518,587)	(1,023,430)
	112%	1,622,244	1,211,583	800,154	387,447	(27,589)	(447,580)	(936,531)
	114%	1,691,396	1,280,773	869,448	456,883	42,250	(376,802)	(850,681)
	116%	1,760,547	1,349,962	938,732	526,320	111,979	(306,236)	(765,731)
	118%	1,829,699	1,419,151	1,007,968	595,734	181,702	(235,835)	(681,497)
	120%	1,898,834	1,488,341	1,077,205	665,094	251,320	(165,586)	(597,834)
	122%	1,967,958	1,557,530	1,146,442	734,454	320,938	(95,455)	(518,084)
	124%	2,037,081	1,626,695	1,215,678	803,814	390,495	(25,412)	(446,830)
	126%	2,106,204	1,695,846	1,284,915	873,163	460,017	44,552	(375,820)
	128%	2,175,328	1,764,998	1,354,152	942,456	529,539	114,410	(305,024)
	130%	2,244,451	1,834,149	1,423,354	1,011,750	598,995	184,248	(234,421)

This table demonstrates that an uplift in values of 2% would be sufficient to achieve viability at the adopted BLV. However, an increase in build costs of circa 15% comes close to eroding the potential to generate a positive residual value unless market values also increase by broadly the same degree (14%).

Although house prices have seen little growth since the study was undertaken, we would not expect this to sustain over the plan period. If values were to increase by circa 25%, then the scheme could weather build cost inflation of up to 30%. Although this is a hypothetical scenario, research shows that such value premiums have been achieved at strategic sites through high-quality placemaking alone. It is also noted that no growth is included in the viability modelling – over the delivery timescales, sales growth could significantly improve the viability conclusions.

On this basis, we consider that the allocation will be viable and deliverable over the plan period.

The representation from the site promoters for Land at Dalton Barracks (WSP and Carter Jonas, on behalf of the DIO) raised viability concerns including the requirements set out in the climate change policies (such as for net zero carbon buildings and reducing embodied carbon) and Policy NH2's requirement for 20% BNG.

The costs included in the viability assessment for net zero carbon buildings are based on robust evidence prepared by Bioregional and Currie and Brown (examination library reference ITV04, page 59). The costs associated with BNG were taken from a research study prepared for the councils' (examination library reference ITV04, page 58). We therefore consider that the costs of achieving these policies are sufficiently evidenced and suitably accounted for in the viability assessment.

The DIO also raises concerns about the items listed as requirements in the Infrastructure Delivery Plan (IDP), both in terms of whether the need for these items is justified and in terms of evidence to support the costs. It is not the role of the viability assessment to assess the justification for the items or to challenge the costs presented in the IDP. However, the assessment has adopted a proportionate assessment of the infrastructure requirements in relation to the site.

The starting point for Aspinall Verdi's assessment has been to work with the promoters, basing infrastructure costs on information provided by them, relating to both policy requirements and their masterplans. Each promoter was invited to set out the anticipated costs of delivering their schemes. Whilst a line-by-line cost comparison was not undertaken between these proformas and the costs included in the IDP, a review of cost headings was undertaken, and where promoters' proformas were clearly lacking certain items included in the IDP, costs were carried forward from the IDP to the appraisals.

Additionally, and as the main "sense check" to ensure the adopted costs were proportionate, a comparison of the available infrastructure and S106 costs for each site was undertaken with the costs from the other allocated sites. This ensured any outliers were identified. Following moderation of the promoter's cost plan, a cost of £70,557 per dwelling was carried forward for Land at Dalton Barracks to the appraisals (examination library reference ITV04,Table 9.3). Across the other sites, costs ranged from £50,182 to £81,000 per dwelling (Tables 9.2 and 9.3). The median cost was £71,562 per dwelling and 5 of the 8 sites shared costs from £70,000-£71,000 per dwelling. On this basis, the adopted cost was deemed reasonable.

It is true that the IDP includes many items which were listed as "To Be Confirmed", many of these County Council highways costs. These costs and their magnitude were unknown at the time of the assessment, and it was therefore not possible to include them in the viability assessment. The AspinallVerdi report does acknowledge this as a viability and delivery risk in its conclusions. However, it should be recognised that the infrastructure allowance made for the site on an overall basis (£70,000 per dwelling) is within the typically expected range for strategic sites in the current market overall. Whilst costs for some items may need to be factored into future modelling, there may also be potential for cost savings as more detail around the sites is worked up. In this sense, the overall allowances made are deemed proportionate for the plan viability assessment.

Taking these considerations into account, we remain of the opinion that the development proposed at Land at Dalton Barracks, including the mix of uses on the site, is viable and deliverable over the plan period.

Q7.2.11 (AS10) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

Policy AS10 – Land at Dalton Barracks Garden Village, Shippon and Policy AS14 – Dalton Barracks Garden Village

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Land at Dalton Barracks Garden Village (AS10).

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS10 requires a comprehensive masterplan for the whole allocation, taking account of the indicative concept plan, the Joint Design Guide (examination library reference DBE01) and the Dalton Barracks Strategic Allocation Supplementary Planning Document (adopted 2022) (examination library reference OCD11). The masterplan is to be prepared collaboratively with Vale of White Horse District Council and in consultation with Oxfordshire County Council, submitted with the first planning application, and used to guide subsequent proposals. This provides the principal mechanism for coordinating the distribution of uses, movement, green infrastructure, connections with the surrounding area (including Shippon and Abingdon) and the sequencing of development.

The Statement of Common Ground (examination library reference LPA58, paragraph 3.10) records agreement that Policy AS10: Land at Dalton Barracks Garden Village, Shippon, identifies an appropriate approach to ensuring development is delivered comprehensively.

Policy AS14 complements this by ensuring that any development, in the AS10 policy area and the wider AS14 policy area, is consistent with the garden village principles and accords with a common set of six objectives.

Policy IN1 (Infrastructure and Service provision) states that new development must be served and supported by appropriate and adequate on site and off site infrastructure and services. Infrastructure requirements for Dalton Barracks Garden Village are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 21 and 22) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS10) Is the expected timescale and rate of development realistic?

Councils' Response:

Policy AS10 – Land at Dalton Barracks Garden Village, Shippon and Policy AS14 – Dalton Barracks Garden Village

Yes, the projected timescale and rate of development is realistic, as set out on pages 90-91 of the Vale of White Horse Housing Land Supply Statement (examination library reference LPA98). These pages set out the conclusions made in respect of the development trajectory of the site, with the key conclusions being:

- The lead in time is based on an outline application being submitted in the winter of 2027/28, as advised by the site promoter DIO. They also advised that they expect the first homes to be delivered in the 2031/32 monitoring year. The district average lead in times for sites of this size to estimate when homes could be delivered, which is 6.8 years from application submission to first completions. However, the DIO has undertaken significant pre-application engagement and technical work to support a future planning application. VOWH has also prepared an SPD for the site. Whilst we don't see any compelling reasons why the site won't deliver housing sooner than the district average we do not anticipate the site will deliver any homes in the relevant five-year period. Consequently, our trajectory expects first completions from 2033/34.
- The average build out rate for all sites of 500 homes or more homes, is 133 home per annum. The size of this site is at the higher end of this category, comparably sized sites have achieved build out rates of between 220 and 470 homes per annum. Consequently, we consider that Dalton Barracks is likely to align more with these build out rates. We have therefore forecast a conservative build out rate of 200 per annum but expect there will be years where the site delivers far in excess of this.

Q7.2.13 (AS10) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy, except in some limited instances which we have highlighted in our response to Q7.2.15. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q.7.2.1, Q.7.2.2, Q.7.2.3, Q7.2.4, Q7.2.6 and Q7.2.10 above, and explain why we consider the plan is sound or that a main modification is needed (see Q7.2.15).

Q7.2.14 (AS10) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording "in accordance with" appears in the policies of the adopted South Oxfordshire Local Plan 2035, however upon reflection we consider a modification to

replace “in accordance with” with “having regard to” would be justified, in respect of Policy AS10 part 2k).

[PROPOSED MODIFICATION] Policy AS10, part 2(k)

> k) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan, including delivery of football and cricket playing pitches, MUGA and a skatepark;

Q7.2.15 (AS10) Are any modifications necessary in the interests of soundness?

Councils’ Response:

Yes.

Please see responses to Q.7.2.14 and Q7.3.6.

We would also like to propose a main modification to the policy text at part 2(e), as set out and agreed in our Statement of Common Ground with the Environment Agency (examination library reference LPA67, page 13). This is to ensure alignment with national policy. The proposed modification is set out below:

[PROPOSED MODIFICATION] Policy AS10, part 2(e)

> e) that there is no built development in Flood Zones 2 and 3 **or the design flood extent (1% AEP plus an appropriate allowance for climate change),** other than essential **infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy)** and green infrastructure **that has been demonstrated to not increase flood risk elsewhere**;

Policy AS11 – Culham Campus

Q7.2.1 (AS11) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Culham Campus (examination library reference LPA59, section 2, pages 2 and 3) details the background to the site allocation. Culham Campus, formerly Culham Science Centre, was originally allocated through the South Oxfordshire Local Plan 2035 (SOLP) (examination library reference ALP01), via Policy STRAT8 which released the site from the Green Belt to enable the development to come forward. The allocation was reviewed through the South Oxfordshire Local Plan examination. In the Inspector's Report (examination library reference LPA101) the Inspector concluded that the employment allocations within Science Vale provide an appropriate strategy for supporting economic growth in the district and specifically considered the role of Culham Science Centre within that strategy (paragraphs 111 to 115). The allocation was consequently found sound and formed part of the adopted development plan.

Policy STRAT8 sought to deliver, in combination with the adjacent strategic allocation under Policy STRAT9, a net increase in employment land of at least 7.3 hectares (with the existing 10 hectares of the No.1 site retained but redistributed across the two strategic allocations). Culham Science Centre is now known as Culham Campus, and construction has been completed on approximately 5ha of land, leaving 2.3ha remaining to come forward (Site Selection Topic Paper, examination library reference TOP07.1, Appendix 3).

In preparing the Joint Local Plan, we did not simply carry forward the SOLP allocation. The site was reassessed alongside reasonable alternatives through the JLP site selection process. The Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing adopted Local Plans to determine whether they remained appropriate allocations. It then sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 page 10, paragraph 2.25 and page 71 assessed the site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. The conclusion was that it was "available, achievable and suitable for development, with some capacity remaining. It is therefore appropriate to consider for allocation in the JLP". The options available to consider for the site were whether to allocate or deallocate it.

The preferred option was to retain the current allocation, subject to presentational changes of the existing criteria / requirements for this site; and the allocation was "recommended to be retained in the Joint Local Plan".

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

This site was also assessed as part of the Employment Land Availability Assessment in the Employment Land Needs Assessment (examination library reference HES08, page 92 Table 7-6).

Q7.2.2 (AS11) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (Local Plan, examination library reference ALP01 and Inspector's Report, (examination library reference LPA101) when it was first allocated for development. That plan was adopted by SODC in December 2020. Since that time, approximately 5 hectares of employment land has been delivered, leaving around 2.3 hectares of the allocation remaining to come forward. This reflects the partial implementation of the allocation rather than any change in the suitability, availability or deliverability of the site. We are not aware of any change in circumstances that would justify altering the allocation boundary or revising the remaining capacity of the site beyond development that has already occurred.

In preparing the Joint Local Plan and in particular the indicative concept plan for this site, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

As stated in paragraph 2.12 of the Statement of Common Ground for this site (examination library reference LPA59 it is common ground between us and the promoters (see paragraphs 3.5 and 3.9) that the policy identifies an appropriate approach to ensuring development at the campus is delivered comprehensively and that development on this site can be delivered in general accordance with the policies contained in the plan.

The promoter's Regulation 19 representation supported the inclusion of the policy, however they stated that 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. We noted the

UK Government's announcement of the first Artificial Intelligence (AI) Growth Zone at Culham, and recognised the potential of this designation 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, we are committed to working together with the site promoter to ensure the delivery of the site (councils' Response to Key Issues, examination library reference LPA48, page 103, response 1).

Q7.2.3 (AS11) How have the mix of uses been determined?

Councils' Response:

The allocation is intended solely for employment development. The proposed mix of uses reflects the role of Culham Campus as a strategic employment location and therefore comprises employment uses within Classes E(g)(i), E(g)(ii), E(g)(iii), B2 and B8. No residential allocation is proposed. The mix has been determined through the Employment Land Needs Assessment (ELNA, examination library reference HES08, table 7-5) and is consistent with the site's identified function in the South Oxfordshire Local Plan (examination library reference ALP01, policy STRAT8: Culham Science Centre).

Q7.2.4 (AS11) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS11, together with the relevant Plan-wide policies, are appropriate to address the potential adverse impacts arising from development of Culham Campus.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS11 assessment, pages 44-46). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS11 and the relevant Plan-wide policies.

Some respondents raised concerns about potential adverse impacts relating to flood risk, water quality and wastewater infrastructure. We responded to these concerns in our councils' Response to Key Issues, regarding Regulation 19 representations (examination library reference LPA48, pages 103-105).

With regards to flood risk, the concerns raised through the representation by the Environment Agency related to the need for updated evidence concerning

unmodelled channels not represented in the Flood Map for Planning. Since submission of the plan, we have prepared the Level 1 Strategic Flood Risk Addendum (examination library reference LPA44) and the Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45). The Environment Agency's representations and our response are summarised in Appendix 1 of the Statement of Common Ground (examination library reference LPA67). The updated flood-risk evidence identifies that 100% of the site is within Flood Zone 1 (examination library reference LPA44, Appendix B, page 1). The Level 2 SFRA Update (examination library reference LPA45, Appendix A, pages 342-368) confirms that the site is wholly within Flood Zone 1 and identifies appropriate mitigation through updated climate change modelling and drainage strategy. Policy AS11 is supported by Plan-wide Policy CE6 (Flood Risk), which requires flood risk to be appropriately assessed and managed. The Environment Agency confirms through the Statement of Common Ground that its concerns have been satisfactorily addressed and no longer maintains any substantive objection in relation to flood risk (paragraph 3.7).

With regards to water quality and wastewater infrastructure, the concerns focused on the ability of wastewater infrastructure to accommodate the development and the potential implications for water quality. These matters have been addressed through the Water Cycle Study (examination library reference LPA46,) and are also summarised in Appendix 1 of the Environment Agency Statement of Common Ground (examination library reference LPA67) where the parties agree that the allocation is sound and that the Exception Test is not required.. The Water Cycle Study (examination library reference LPA46 section 4.3.5, page 38 and 39) confirms that Culham Campus would drain to Culham STW and that the projected Dry Weather Flow remains within the current maximum flow permit with 30% of headroom still available.

We therefore consider that flood-risk and water-management effects have been appropriately assessed and can be effectively mitigated through the policy framework and detailed assessment at planning application stage.

The potential adverse impacts of developing the site and the steps we have taken to mitigate them are set out below.

Transport/traffic

The transport implications of growth in the Culham area have been considered through our transport evidence base (including transport modelling (examination library reference ITV03, Transport Modelling Report) and infrastructure planning (ITV02, Study of Active Travel for Allocations, LPA17, Infrastructure Delivery Plan, TOP10.2, Transport Safeguarding Topic Paper). The Transport Modelling Report (examination library reference ITV03, sections 4.3 and 4.5) considers planned growth at Culham as part of the Joint Local Plan growth and associated transport network assumptions. The wider evidence identifies a package of sustainable transport and highway measures for growth in the Culham area,

including improvements to walking and cycling infrastructure, public transport, Culham railway station and elements of the Didcot Garden Town HIF1 Scheme.

The proximity of Culham Campus to Culham railway station provides an opportunity to support travel by sustainable modes. The transport evidence supporting the adjoining AS2 allocation identifies Culham railway station, existing bus provision, National Cycle Route 5 and public rights of way as part of the existing sustainable transport network serving this location. Policy AS11 provides the site-specific framework for continued development at Culham Campus, supported by the plan-wide transport policies.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS11 assessment, pages 44 -46) identifies moderate positive effects overall in relation to sustainable travel. The site is well located, with four bus stops, Culham train station and three Public Rights of Way within walking distance.

Policy AS11 provides for mitigation through high-quality walking and cycling infrastructure, although the site's proximity to the A-road network may encourage some private car use. A Transport Assessment at the planning application stage will establish the precise nature and extent of any necessary mitigation.

Overall, we consider that the transport effects associated with further development at Culham Campus have been considered at an appropriate level for plan-making and that the policy framework provides an effective basis for securing necessary mitigation. Please also see our response to Question 7.2.6 regarding the effects on the highway networks.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS11 assessment, pages 44 - 46) predicts negligible adverse effects in relation to pollution at Culham Campus, particularly during the construction phase when activities may contribute to air and noise pollution effects and during operation, when noise, air and light pollution are possible. However there are limited residential receptors nearby.

Although the site is adjacent to the A415 and close to a railway line, the proposed employment use means the sensitivity of receptors will be limited. The site falls predominantly within Dark Skies Zone E3 (suburban medium district brightness zone) and therefore the risk of light pollution effects is considered to be low. The area has also been assessed to be of low tranquillity.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the Plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and Plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS11 assessment, pages 44-46) predicts neutral effects on biodiversity as the site is already in use as a science campus with small pockets of open space and vegetation and disturbance levels are already expected to be high.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1 – 3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS11 assessment, pages 44-46) identifies neutral effects in relation to landscape. The site does not fall within 2km of a National Landscape, and the extent of any limited landscape effects will be dependent on the scale, layout and massing of the development coming forward.

Policy AS11 requires the site owner to develop a masterplan, which should include a comprehensive assessment of landscape impacts. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and

countryside. Overall, we consider that the policy provides an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS11 assessment, pages 44-46) predicts negligible adverse effects in relation to the historic environment for Culham Campus. Nuneham House Registered Park and Garden lies to the north of the site and there are several Grade II Listed Buildings nearby, particularly within the village of Clifton Hampden. Development has the potential for adverse effects on the registered parkland.

The site-specific heritage evidence is provided by the Heritage Impact Assessment prepared for the South Oxfordshire Local Plan strategic sites (examination library reference NHL02, section 4.3 pages 13 to 53). This identifies a range of heritage considerations associated with Culham Campus and its surroundings, including designated heritage assets at Culham Station and Europa School UK, the historic landscape character of the site and archaeological remains identified through cropmarks and geophysical survey. The assessment identifies the potential for development to affect the setting of Europa School UK and recommends high-quality design, landscaping and an appropriate landscape buffer to minimise that impact. It also recommends that historic field boundaries are incorporated into the layout where possible, and that pre-determination archaeological evaluation trenching, informed by geophysical survey, is undertaken to establish the significance of potential archaeological remains and inform an appropriate mitigation strategy (examination library reference NHL02, section 4.3).

Policy AS11 requires the site owner to carry out a comprehensive assessment of heritage impacts and the policy requires proposals to respect and conserve the setting of the Registered Park and Garden.

The Joint Local Plan Heritage Impact Assessments (examination library reference NHL03, pages 3–8) provide the updated JLP-wide methodology for heritage impact assessment and confirm that earlier Local Plan heritage evidence forms part of the evidence base for previous strategic allocations (page 6).

Flood risk and water management

The flood-risk and water-management implications of development in the Culham area have also been considered through our updated evidence. The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS11 site assessment) confirms that the site is wholly within Flood Zone 1 and that the Exception Test is not required because the proposed uses are less vulnerable; it identifies surface water and groundwater as the principal flood-risk considerations and requires the surface water flow path through the east of the site to inform the development layout, supported by a detailed drainage strategy and site-specific Flood Risk Assessment.

Wastewater infrastructure in the Culham area has been considered through the Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.5). The study identifies planned development draining to Culham Sewage Treatment Works and confirms that, while planned growth would significantly increase flows, projected dry-weather flow remains within the current maximum-flow permit and Thames Water has identified Culham Sewage Treatment Works for capacity upgrades. The plan-wide requirements of Policy CE8 (Water quality, wastewater infrastructure and drainage) provide the framework for ensuring that further development is appropriately coordinated with wastewater and drainage infrastructure. The precise requirements can therefore be established through detailed technical assessment and engagement with the relevant infrastructure providers as individual proposals come forward.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the allocation is sound in relation to flood risk. The Environment Agency identifies an unmodelled ordinary watercourse to the north of the site but confirms that this is not a soundness concern and that the Exception Test is not required.

We therefore consider that the flood-risk and water-management implications of Policy AS11 can be appropriately addressed through the site-specific allocation and the relevant plan-wide policies. The evidence identifies the matters requiring consideration, while detailed flood-risk, drainage and wastewater infrastructure requirements can appropriately be established at planning application stage.

Q7.2.5 (AS11) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

The Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). The Sequential Test and Exception Test were applied using the information in our Regulation 19 version Strategic Flood Risk Assessment (SFRA) (examination library references CEQ11, CEQ11.1, CEQ12 and CEQ12.1).

Since the submission of the Plan for examination, there have been two updates to the SFRA. The first update was required due to significant updates to Environment Agency (EA) national flood risk mapping in March 2025. We agreed to undertake this update in our June 2025 Statement of Common Ground (SoCG) with the EA (examination library reference LPA37, paragraph 2.6), recognising that *"depending on the outcome of that process, the sequential test may need to be re-applied".*

The SFRA update was completed in September 2025 (examination library references LPA44 and LPA45). As the SFRA update identified changes in flood risk

to some of the site allocations proposed in the Plan, we re-applied the Sequential Test and Exception Test (where required). It was found that the proposed site allocations remained justified on this basis.

Shortly after the re-application of the Sequential Test and Exception Test was completed the examination of the Plan was paused, and so the updated Sequential Test and Exception Test paper was not submitted at that time. When the examination process resumed in early 2026, we were already aware from our ongoing engagement with the EA that we were likely to need to undertake a further update to the SFRA and that subsequently the Sequential Test and Exception Test may need to be reapplied, so we did not submit the updated Sequential Test and Exception Test paper at that time, particularly as the Stage 2 hearings focused on other matters. We are able to provide this evidence if it would be of assistance to the Inspectors.

The SFRA is now undergoing a further update with a revised methodology for delineating the functional floodplain as agreed in our June 2026 SoCG with the EA (examination library reference LPA67) and to take account of further updates to national flood risk mapping made in July 2026. The Level 1 update is now complete and will be submitted to the examination alongside this statement. The Level 2 update is in progress and we expect to receive draft outputs from our consultants in late October. We will need to share the draft Level 2 outputs with the EA and Oxfordshire County Council (as the Lead Local Flood Authority) and consider any comments that they provide. The final updated Level 2 SFRA will be submitted to the examination as soon as possible.

As the Level 1 update has identified further changes in flood risk to some of the site allocations proposed in the Plan, we have reapplied the Sequential Test using the updated Level 1 SFRA. The proposed site allocations remain justified on this basis.

The application of the Exception Test is partly dependant on the recommendations of the Level 2 SFRA, which advises on whether development can be made safe for its lifetime. As the Level 2 SFRA update is currently in progress, we have been unable to complete the Exception Test update at the current point in time, but we will endeavour to do so as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is not required to pass the Exception Test as it is not located in Flood Zone 3a.

Q7.2.6 (AS11) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03, Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01, Existing Transport Conditions Report, ITV02, Study of Active Travel for Allocations, LPA17, Infrastructure Delivery Plan, TOP10.2, Transport Safeguarding Topic Paper, and TOP08.2, Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in Oxfordshire County Council's Strategic Planning Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3, paragraph 2.1) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS11) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS11 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Culham Campus. A summary of the key infrastructure requirements is provided in Section 5 of the IDP (pages 13-14), with detailed infrastructure requirements, indicative costs, delivery mechanisms, funding sources and timing set out in Appendix 2.2: Infrastructure Requirements for Land adjacent to Culham Campus (Policy AS2). These requirements primarily relate to the residential allocation AS2: Land adjacent to Culham Campus, however many of the infrastructure requirements also support the development of Culham Campus, for example the Housing Infrastructure Fund (HIF1) infrastructure package and the Culham Railway Station Development (examination library reference LPA17, Appendix 2.2, page 54, CUL21 and CUL22).

The infrastructure requirements identified in the IDP are reflected directly in Policy AS11. Part 1 criterion (c) requires proposals for additional employment provision at Culham Campus to address all necessary infrastructure, to be agreed in consultation with Oxfordshire County Council based on up-to-date evidence on the impact of the development. This should reference the latest IDP, but not be limited to this document.

Additionally, Policy LS1 (Proposals for large scale major development), which is applicable to Culham Campus, requires in part 1 criterion (e) that development proposals must ensure that necessary supporting infrastructure is provided, including social and community infrastructure. Developers must engage with relevant infrastructure providers to ensure the implementation of the IDP. Together with the other requirements of Policy AS1, these provisions provide the framework for securing the infrastructure identified in the IDP.

This is supported by the Statement of Common Ground for Culham Campus (examination library reference LPA59, paragraph 3.14) which confirms that the parties are working positively together to ensure there is adequate planning for infrastructure necessary to support further development at Culham Campus and that appropriate infrastructure will be delivered as set out in the IDP. The site will contribute appropriately towards the delivery of necessary transport infrastructure.

The physical constraints relating to the allocation are the need to provide sufficient infrastructure capacity to support growth, together with the landscape and heritage considerations relating to the surrounding countryside and setting of the Grade 1 Registered Park and Farden associated with Nuneham House. These matters are

addressed through the requirements of Policy AS11 and will be considered further through the comprehensive masterplan required by part 1 criteria (a) and part 2.

The infrastructure requirements, costs, delivery arrangements and phasing will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a common and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan will ensure that infrastructure provision, regeneration measures and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policy AS11 and LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process having regard to the latest available evidence.

Q7.2.8 (AS11) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Culham Campus (examination library reference LPA59). Paragraph 2.3 confirms that Culham Campus is owned and managed by the United Kingdom Atomic Energy Authority (UKAEA), and paragraph 3.4 confirms that it is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

There is clear evidence of promoter interest in bringing the site forward. As set out in the councils Response to Key Issues (examination library reference LPA48, page 103) in January 2025 the UK Government announced that it will deliver the first Artificial Intelligence (AI) Growth Zone at Culham. With this significant national backing, the vision for Culham Campus as a hub of innovation and growth is well positioned to be realised. This is supported by the Statement of Common Ground for Culham Campus (examination library reference LPA59) which confirms that in light of the recent designation of the AI Growth Zone, SODC and site developer commit to working collaboratively to maximise the employment opportunities this presents for research organisations and businesses operating on site, and to bring benefits for local communities. (paragraph 3.15).

We are therefore satisfied that there is a clear landownership position and no landownership or developer interest issues that would prevent the allocation from being capable of coming forward within the plan period.

Q7.2.9 (AS11) How is it intended to bring the site forward for development?

Councils' Response:

The Statement of Common Ground for Culham Campus (examination library reference LPA59) captures the commitment by both parties to work jointly to enable delivery of the planned development of employment land within the plan period (paragraph 4.2) and to work collaboratively to maximise the employment opportunities for research organisations and businesses operating on site, and to bring benefits for local communities (paragraph 3.15). The Statement of Common Ground further confirms that the parties are committed to continued partnership working to ensure the optimum outcome for the site and that the site is sustainable, suitable, available and developable (paragraphs 3.3, 3.16 and 4.1).

Parts 1(a) and 2 of Policy AS11 require development of a masterplan for the site that details the principles and parameters which facilitate any future growth. This should include a comprehensive assessment of transport impacts, landscape impacts, arboricultural impacts, archaeological and heritage impacts, and ecological impacts. This masterplan must be agreed with the Local Planning Authority in consultation with Oxfordshire County Council. We will determine future applications on this site in accordance with an agreed masterplan or any approved updates to it. In their Regulation 19 representation the site promoter raised a concern regarding the requirement for an approved masterplan, citing the current masterplan that has been used in determining existing planning applications at the site and has been referenced by SODC in its decision making. We acknowledged this concern in the councils Response to Key Issues (examination library reference LPA48, page 103), noting that given the designation of Culham Campus as an AI Growth Zone, 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. We consider that a refreshed masterplan is required. The existing 2022 Framework Masterplan is expressly described by UKAEA as a working document requiring regular review and updating; the subsequent designation of Culham as an AI Growth Zone and the evolving role of the Campus reinforce the need for an updated, agreed masterplan as required by Policy AS11.

We are therefore satisfied that active work is underway to progress the site and that there is a clear route to delivery of the allocation.

Q7.2.10 (AS11) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

Yes. Culham Campus is an active and viable employment site (where development is consistently taking place). In their Regulation 19 representation, the site promoter did not raise any viability concerns.

(Aspinall Verdi's Viability Report Appendices, examination library reference ITV04.1, pages 93-94, explain that they have not appraised employment-only allocations).

Q7.2.11 (AS11) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Culham Campus.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 for a comprehensive masterplan informed by relevant technical studies, Policy AS11 requires a comprehensive masterplan for the site, to be prepared collaboratively with South Oxfordshire District Council and in consultation with Oxfordshire County Council and used to determine future applications on the site. This provides a comprehensive and coordinated approach to development, by setting out the principles and parameters which facilitate any future growth, including a comprehensive assessment of transport impacts, landscape impacts, arboricultural impacts, archaeological and heritage impacts, and ecological impacts.

Policy IN1 Infrastructure and Service provision states that new development must be served and supported by appropriate and adequate on site and off site infrastructure and services. Infrastructure requirements for Culham Campus are identified through the Infrastructure Delivery Plan (examination library reference LPA17, Appendix 2.2) which sets out the infrastructure requirements for land adjacent to Culham Campus, some of which are applicable to Culham Campus for example the Housing Infrastructure Fund (HIF1) infrastructure package and Culham Railway Station development. These will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS11) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, we consider the expected timescale and rate of development to be realistic.

Unlike the strategic housing allocations, Policy AS11 is an employment allocation and therefore does not have a housing delivery trajectory or anticipated annual dwelling completions. The appropriate test is whether there is a realistic prospect of the employment development envisaged by the allocation coming forward within the plan period.

Culham Campus is an established employment location with a strong track record of delivering employment development and supporting infrastructure. The allocation provides for the continued expansion of the Campus in accordance with its long-term development strategy rather than the delivery of a single development scheme.

The Statement of Common Ground between the councils' and the site promoter (examination library reference LPA59) records agreement that "the parties are working jointly to enable delivery of the planned development of employment land within the plan period" (paragraph 4.2). This provides clear evidence that the allocation is actively being progressed and that there is a shared commitment to delivery. The Statement of Common Ground also confirms agreement between the parties that the allocation is suitable, available and deliverable (paragraph 4.1).

The designation of Culham Campus as an AI Growth Zone provides further support for the continued expansion of employment activity at the site and reinforces the strategic importance of the Campus as a location for research, innovation and economic growth.

Taking these factors together, we are satisfied that there is a realistic prospect of the employment development envisaged by Policy AS11 being delivered within the plan period and that the anticipated timescale for development is realistic.

Q7.2.13 (AS11) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q.7.2.2, Q7.2.4 and Q7.2.10 above, and why we consider the plan is sound.

Q7.2.14 (AS11) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording "in accordance with" in respect of the Infrastructure Delivery Plan does not appear in this policy.

Q7.2.15 (AS11) Are any modifications necessary in the interests of soundness?

Councils' Response:

There are no modifications necessary in the interests of soundness for Policy AS11: Culham Campus. The policy is supported by the evidence base, has been demonstrated to be deliverable through the Statement of Common Ground, and provides a clear and effective framework for determining planning applications and guiding the future development of the Campus. We therefore consider the policy to be justified, effective and consistent with national policy.

Policy AS12 – Harwell Campus

Q7.2.1 (AS12) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Harwell Campus (examination library reference LPA73, section 2, pages 2 and 3) details the background to the site allocation. Harwell Campus was originally allocated through the Vale of White Horse Local Plan 2031 Part 1 (LPP1) (examination library reference ALP03), via Core Policy 15: Spatial Strategy for South East Vale Sub-Area and Core Policy 6: Meeting Business and Employment Needs. The allocation was reviewed through the Vale of White Horse Local Plan examination. In the Inspector's Report (examination library reference LPA99) the Inspector concluded that the South East Vale strategy, including provision for significant employment growth at locations such as Harwell Campus, was based on a robust site selection process and provided a sound strategy for supporting economic growth within Science Vale (paragraphs 111 and 135). The Inspector also considered in detail proposals associated with Harwell Campus and the surrounding area (paragraphs 114-123), ultimately concluding that the wider employment strategy was sound. The allocation was consequently found sound and formed part of the adopted development plan.

The role of Harwell Campus was subsequently revisited through the Vale of White Horse Local Plan 2031 Part 2 (examination library reference ALP04). Core Policy 15b established a comprehensive development framework for the Campus, requiring growth to come forward in a coordinated manner supported by measures relating to transport, landscape, ecology and environmental quality. Through the part 2 examination, the Inspector recognised that Harwell Campus forms a critical focus of the LPP1 strategy for the South East Vale to accommodate the majority of the district's employment growth (examination library reference LPA100, paragraph 59). This provided a further endorsement of Harwell Campus as a strategic employment location and reinforced the importance of a comprehensive approach to future development.

Harwell Campus was originally identified as a strategic employment location through the LPP1 and has subsequently become one of the principal science and innovation campuses within Science Vale. The Joint Local Plan continues this established strategy by allocating approximately 93 hectares of employment land at Harwell Campus. As set out in the Site Selection Topic Paper (examination library reference TOP07.1, Appendix 3), the site was reviewed through the Joint Local Plan process and found to remain available, achievable and suitable for further employment development.

In preparing the Joint Local Plan, we did not simply carry forward the Vale LPP1 allocation. The site was reassessed alongside reasonable alternatives through the JLP site selection process. The Site Selection (incorporating Sequential Flood Risk

and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing adopted Local Plans to determine whether they remained appropriate allocations. It then sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 page 10, paragraph 2.25 and page 74 assessed the site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. The conclusion was that it was "available, achievable and suitable for development, with some capacity remaining. It is therefore appropriate to consider for allocation in the JLP". The options available to consider for the site were whether to allocate or deallocate it.

The preferred option was to retain the current allocation, subject to presentational changes of the existing criteria / requirements for this site; and the allocation was "recommended to be retained in the Joint Local Plan".

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

This site was also assessed as part of the Employment Land Availability Assessment in the Employment Land Needs Assessment (examination library reference HES08, page 98 Table 7-12).

Q7.2.2 (AS12) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation were established through the adopted Vale of White Horse Local Plan Part 1 (Vale LPP1, examination library reference ALP03) and found sound through the Vale Local Plan examination (examination library reference LPA99). Harwell Campus is an established nationally and internationally significant centre for science, innovation and research, and there has been no change in circumstances that would justify a reconsideration of its role as a strategic employment allocation.

Core Policies 6 and 15 of the adopted Vale LPP1 established Harwell Campus as a key strategic employment location within the Science Vale area and allocated 128 hectares of employment land at the Campus (93 hectares within the Enterprise Zone and 35 hectares outside the Enterprise Zone).

The continued role of the Campus was also confirmed through the Vale Local Plan Part 2 (examination library reference ALP04). Core Policy 15b and its supporting text recognise Harwell Campus as a nationally and internationally significant centre for research and innovation and require new development to be guided by a comprehensive development framework. The policy also makes provision for continued research, innovation and economic development and for at least 3,500 net additional jobs up to 2031, with potential for further growth as decommissioning of the licensed site progresses (paragraphs 2.103–2.113 and Core Policy 15b).

Since adoption of the Vale Local Plan, Harwell Campus has continued to develop as a nationally and internationally significant centre for science, research and innovation. The Joint Local Plan therefore supports the continued expansion of an existing strategic employment campus. As set out in the Site Selection Topic Paper (examination library reference TOP07.1, Appendix 3) the site was reviewed through the Joint Local Plan process and found to remain available, achievable and suitable for further employment development.

In preparing the Joint Local Plan, we did not simply carry forward the Vale LPP1 allocation. The site was reassessed alongside reasonable alternatives through the Joint Local Plan site selection process. The Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains the methodology used to review the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how allocations in the existing adopted Local Plans were reviewed to determine whether they remained appropriate allocations. It then explains how alternative sites were identified and assessed, and how those findings informed the allocations taken forward in the Joint Local Plan.

TOP07.1 assesses Harwell Campus against the Planning Practice Guidance tests of availability, achievability and suitability and concludes that the site remains appropriate for allocation. The site was also assessed through the Employment Land Availability Assessment contained within the Employment Land Needs Assessment (examination library reference HES08, page 98 Table 7-12), which confirmed its ongoing role as a strategic employment location.

The allocation of approximately 93 hectares of employment land reflects the established and continuing role of Harwell Campus within the Science Vale economy and its anticipated contribution towards meeting future employment land needs. The site area and allocation boundary have been informed by environmental constraints, infrastructure requirements, landscape considerations, transport impacts and the ongoing operation of the Harwell Nuclear Licensed Site. Policy AS12 requires these matters to be addressed comprehensively through a masterplan, supported by detailed assessments of transport, landscape, archaeology, heritage, ecological impacts and infrastructure requirements. Please see our response to Question 7.3.9 which sets out how the requirements for the production of a masterplan at Harwell Campus are justified.

Specific matters relating to site constraints, infrastructure provision and deliverability are addressed in more detail in our responses to Questions 7.2.4-7.2.7, 7.2.10 and 7.2.13.

The Statement of Common Ground for Harwell Campus (examination library reference LPA73) records agreement between the councils' and the site promoter that the site remains suitable for continued employment growth (paragraph 4.1) and that the allocation can be delivered in accordance with the policy framework (paragraphs 3.4, 3.6 and 3.7).

We therefore consider that the site area, boundaries and capacity assumptions are justified, evidence-based and supported by the available evidence.

Q7.2.3 (AS12) How have the mix of uses been determined?

Councils' Response:

The allocation is intended solely for employment development. The proposed mix of uses reflects the role of Harwell Campus as a strategic employment location and therefore comprises employment uses within Classes E(g)(i), E(g)(ii), E(g)(iii), B2 and B8. No residential allocation is proposed. The mix has been determined through the Employment Land Needs Assessment (ELNA, examination library reference HES08, table 7-11) and is consistent with the site's identified function in the Vale LPP1 (examination library reference ALP03, Core Policies 6 and 15).

Q7.2.4 (AS12) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS12, together with the relevant Plan-wide policies, are appropriate to address the potential adverse impacts arising from development of Harwell Campus.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS12 assessment, pages 47-49). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS12 and the relevant Plan-wide policies.

Some respondents raised concerns about potential adverse impacts relating to flood risk, water quality and wastewater infrastructure, and also traffic impacts. We responded to these concerns in the councils' Response to Key Issues, regarding

Regulation 19 representations (examination library reference LPA48, pages 105 to 106).

With regards to flood risk, the concerns raised through the representation by the Environment Agency related to the need for updated evidence concerning unmodelled channels not represented in the Flood Map for Planning. Since submission of the plan, we have prepared the Level 1 Strategic Flood Risk Addendum (examination library reference LPA44) and the Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45). The Environment Agency's representations and our response are summarised in Appendix 1 of the Statement of Common Ground (examination library reference LPA67). The updated flood-risk evidence identifies that 100% of the site is within Flood Zone 1 (examination library reference LPA44, Appendix B, page 1). The Level 2 SFRA Update (examination library reference LPA45, Appendix A, pages 369-393) confirms that the site is wholly within Flood Zone 1 and identifies appropriate mitigation through updated climate change modelling and drainage strategy. Policy AS12 is supported by Plan-wide Policy CE6 (Flood Risk), which requires flood risk to be appropriately assessed and managed. The Environment Agency confirms through the Statement of Common Ground (examination library reference LPA67) that its concerns have been satisfactorily addressed and no longer maintains any substantive objection in relation to flood risk (paragraph 3.7).

With regards to water quality and wastewater infrastructure, the concerns focused on the ability of wastewater infrastructure to accommodate the development and the potential implications for water quality. These matters have been addressed through the Water Cycle Study (examination library reference LPA46,) and are also summarised in Appendix 1 of the Environment Agency Statement of Common Ground (examination library reference LPA67) where the parties agree that the allocation is sound and that the Exception Test is not required.. The Water Cycle Study (examination library reference LPA46 section 4.3.5, page 38 and 39) confirms that Culham Campus would drain to Culham STW and that the projected Dry Weather Flow remains within the current maximum flow permit with 30% of headroom still available.

With regards to traffic impacts, the concern focussed on growth at Harwell Campus may have impacts on the Strategic Road Network and Chiltern Interchange. 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). Please see our response to Question 7.2.6 regarding the effects on the highway networks.

We therefore consider that flood-risk and water-management effects have been appropriately assessed and can be effectively mitigated through the policy framework and detailed assessment at planning application stage.

The potential adverse impacts of developing the site and the steps we have taken to mitigate them are set out below.

Transport/traffic

Representations raised concerns that growth at the Campus may affect the Strategic Road Network and Chiltern Interchange on the A34, as well as highlighting the importance of supporting a shift away from private-car use. These matters are summarised in the councils' Response to Key Issues (examination library reference LPA48, pages 105-106). It explains that the transport requirements for Harwell Campus are underpinned by the Oxfordshire Local Transport and Connectivity Plan (examination library reference LNP10) and that we consider the transport requirements to be justified and effective.

Policy AS12 provides for the continued sustainable growth of Harwell Campus through a coordinated and comprehensive approach. A masterplan is required to establish the principles and parameters for that growth, including consideration of transport impacts and the site's landscape context within the North Wessex Downs National Landscape (LPA48). Detailed assessment at planning application stage will establish the particular transport effects of individual proposals and the precise form and timing of any necessary mitigation.

We therefore consider that the potential transport effects associated with further development at Harwell Campus have been recognised and that Policy AS12, together with the plan-wide transport policies and detailed assessment at planning application stage, provides an effective framework for mitigation.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS12 assessment, pages 47-49) identifies moderate positive effects overall in relation to sustainable travel. The site is well located, with seven bus stops within or bordering the site and an additional one within 400m. Eleven Public Rights of Way and one cycle route are also within walking distance.

Policy AS12 provides for mitigation through walking, cycling and bus infrastructure, although the site's proximity to the A-road network may encourage some private car use. A Transport Assessment at application stage will establish the precise nature and extent of any necessary mitigation.

Overall, we consider that the policy provisions provide an effective framework for mitigation of the identified transport impacts. Please see our response to Question 7.2.6 regarding the effects on the highway networks.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS12 assessment, pages 47 - 49) predicts negligible adverse effects in relation to pollution at Harwell Campus, particularly during the construction phase when activities may contribute to air and noise pollution effects to residents to the

south in Chilton Field. During the site's operation, noise, air and light pollution are also possible.

Although the site is adjacent to the A4185 and close to the A34, the proposed employment use means the sensitivity of receptors will be limited. The site falls predominantly within Dark Skies Zone E3, and the risk of light pollution effects is therefore considered to be low. The area has also been assessed to be of low / mixed tranquillity.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the Plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and Plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS12 assessment, pages 47 - 49) predicts neutral effects on biodiversity as the site is already in use as a science and innovation campus with small pockets of open space and vegetation, and disturbance levels are already expected to be high.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1 – 3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS12 assessment, pages 47 -49) identifies minor adverse effects in relation to landscape, due to the site's location within the North Wessex Downs National Landscape. Depending on the scale, layout and massing of development there is potential for adverse impacts to this landscape feature.

Policy AS12 stipulates that development proposals will not unacceptably harm the landscape and scenic beauty of the National Landscape, taking into account their location, scale, bulk, height and materials. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that the policy provides an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS12 assessment, pages 47 - 49) predicts negligible adverse effects in relation to the historic environment for Harwell Campus. There is a Grade II Listed milestone directly to the east of the site and Grim's Ditch scheduled monument to the south. However, given the existing uses on site and the nature of the heritage assets, the SA does not predict severe setting impacts.

Policy AS12 requires development proposals to adequately assess and mitigate impact upon any areas of archaeological interest and heritage assets.

The Joint Local Plan Heritage Impact Assessments (examination library reference NHL03, pages 3–8) provide the updated JLP-wide methodology for heritage impact assessment and confirm that earlier Local Plan heritage evidence forms part of the evidence base for previous strategic allocations (page 6).

Flood risk and water management

The updated flood-risk evidence identifies a very low level of risk at Harwell Campus. The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS12 site assessment) concludes that it should be appropriate for the site to be allocated given the very low fluvial and surface water flood risk. It also confirms that the Exception Test is not required because the proposed uses are less vulnerable. The assessment nevertheless identifies the need for updated climate-change modelling of surface water flood risk and confirms that this can appropriately be undertaken through a site-specific Flood Risk Assessment.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the allocation is sound in relation to flood risk. The Environment Agency confirms that there are no flood-risk concerns and that the Exception Test is not required.

Policy AS12 is supported by the plan-wide flood-risk and water-management policies, including Policy CE6 and Policy CE8. These provide the framework for any necessary detailed Flood Risk Assessment, drainage measures and water infrastructure requirements to be established as individual proposals come forward. We therefore consider that the flood-risk and water-management effects of the allocation have been assessed at an appropriate level for plan-making.

Q7.2.5 (AS12) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is not required to pass the Exception Test as it is proposed for a less vulnerable use (employment).

Q7.2.6 (AS12) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03, Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references: ITV01, Existing Transport Conditions Report, ITV02, Study of Active Travel for Allocations, LPA17 Infrastructure Delivery Plan, TOP10.2, Transport Safeguarding Topic Paper, and TOP08.2, Spatial Strategy Topic Paper). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in OCC's Regulation 19 representation, they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS12) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

The principal infrastructure requirements for Harwell Campus relate to transport, movement, utilities and environmental mitigation. Policy AS12 requires a campus-

wide travel plan, modelling of traffic impacts across the whole Campus, sustainable transport improvements, public transport enhancements, walking and cycling infrastructure, landscape mitigation, ecological mitigation and any other infrastructure necessary to support future growth (Policy AS12 part 3(c), (d) and (g)). The precise infrastructure package and associated costs will depend on the nature, scale and timing of future development proposals and will therefore be determined through the masterplanning and development management processes.

The principal constraints affecting the site include transport capacity, the site's location within the North Wessex Downs National Landscape, and the presence of the Harwell Nuclear Licensed Site. These constraints are recognised within Policy AS12 and supporting text paragraph 8.90, which explains that future growth must be planned comprehensively, taking account of transport, landscape and other environmental impacts across the whole campus.

These matters will be addressed through the masterplan required by part 2 of Policy AS12, which must be supported by comprehensive assessments of transport, landscape, ecological, archaeological and heritage impacts. Part 3 of Policy AS12 further requires future development proposals to demonstrate how impacts will be mitigated and how the necessary infrastructure will be delivered. The policy therefore provides a framework through which infrastructure requirements, costs, constraints and mitigation measures can be identified and addressed as development proposals come forward.

Policy AS12 does not rely on a site-specific infrastructure schedule within the Infrastructure Delivery Plan (examination library reference LPA17), which is focused primarily on the strategic residential-led allocations in the Joint Local Plan. Nevertheless, the policy contains a comprehensive framework for identifying, assessing and securing the infrastructure required to support future growth at Harwell Campus.

Policy LS1, which applies to Harwell Campus, requires large-scale major development proposals to ensure that necessary supporting infrastructure is provided, including social and community infrastructure, and requires engagement with relevant infrastructure providers. Together, Policies AS12 and LS1 provide the mechanism through which infrastructure requirements, costs, delivery arrangements and phasing will be identified and secured.

This approach reflects the nature of Harwell Campus as an established strategic employment location where infrastructure requirements will evolve alongside the campus and are most appropriately determined through the masterplanning and development management processes rather than through a fixed infrastructure schedule.

The Statement of Common Ground for Harwell Campus (examination library reference LPA73) confirms agreement between the councils' and the site promoter that appropriate infrastructure will be delivered as set out in the IDP. The site will

contribute appropriately towards the delivery of necessary transport infrastructure to reduce reliance on the private car (3.12).

We are therefore satisfied that the necessary infrastructure requirements and associated constraints have been identified and that Policies AS12 and LS1 provide an effective framework for securing the infrastructure necessary to support the continued growth of Harwell Campus.

Q7.2.8 (AS12) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Harwell Campus (examination library reference LPA73). Paragraphs 1.1 and 1.2 confirms that the vast majority of Harwell Campus is controlled by Harwell Science and Innovation Campus Limited Partnership/UK Research and Innovation's (UKRI) Science and Technology Facilities Council (STFC).

There is clear evidence of promoter interest in bringing the site forward. As set out in the Statement of Common Ground for Harwell Campus (examination library reference LPA73) the parties agree that the site is suitable, available and developable for employment development, and are working jointly to enable delivery of the planned development of employment land within the plan period (paragraphs 4.1 and 4.2).

We are therefore satisfied that there is a clear landownership position and no landownership or developer interest issues that would prevent the allocation from being capable of coming forward within the plan period.

Q7.2.9 (AS12) How is it intended to bring the site forward for development?

Councils' Response:

The Statement of Common Ground for Harwell Campus (examination library reference LPA73) records agreement between the councils' and the site promoters regarding the continued development and expansion of Harwell Campus. The Statement of Common Ground confirms that Harwell Campus remains a suitable location for continued employment growth (paragraphs 3.3 and 4.1) and that the allocation can be delivered in accordance with the policy framework (paragraphs 3.4, 3.6, 3.7 and 3.8). It also records agreement that the parties are committed to continued partnership working to ensure the optimum outcome for the site that delivers new employment-generating development in a sustainable location (paragraph 3.13).

Part 2 of Policy AS12 requires the site owners to work proactively with the councils' to prepare a masterplan which establishes the principles and parameters for future

development across the Campus. The masterplan must include comprehensive assessments of transport, landscape, ecological, archaeological and heritage impacts and be prepared in consultation with Oxfordshire County Council. Future planning applications will then be determined in accordance with the agreed masterplan or any approved updates to it. Please see our response to Question 7.3.9 which sets out how the requirements for the production of a masterplan at Harwell Campus are justified.

Development is expected to come forward progressively as decommissioning and remediation release land within the former nuclear licensed site. The supporting text to Policy AS12 recognises this phased relationship, with the masterplan providing the mechanism to coordinate development as land becomes available (paragraphs 8.91–8.92).

This approach reflects the nature of Harwell Campus as an established and operational strategic employment location, where development is expected to come forward over an extended period through multiple individual schemes rather than a single planning application. The masterplanning process provides the mechanism through which future growth can be coordinated, infrastructure requirements identified and cumulative impacts managed across the Campus as a whole.

The site also benefits from an established delivery model and a strong track record of ongoing investment and development. (Vale of White Horse District Council Authority Monitoring Report, examination library reference OCD07.1, page 40, table 12) Harwell Campus is a nationally and internationally significant centre for science, innovation and research, and the allocation supports the continued expansion of an existing employment hub rather than the creation of a new one.

We are therefore satisfied that active work is underway to support the future growth of Harwell Campus and that there is a clear and deliverable route through which the allocation can continue to be brought forward over the plan period.

Q7.2.10 (AS12) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

Yes. Harwell Campus is an active and viable employment site (where development is consistently taking place). In their Regulation 19 representation, the site promoter did not raise any viability concerns.

(Aspinall Verdi's Viability Report Appendices, examination library reference ITV04.1, pages 93-94, explain that they have not appraised employment-only allocations).

Q7.2.11 (AS12) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Harwell Campus.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals ensure necessary infrastructure is provided, including social and community infrastructure, and that they are supported by a comprehensive masterplan informed by relevant technical studies.

In accordance with the requirements of Policy LS1, Policy AS12 requires the site owners to work proactively with the councils' to prepare a masterplan for the Campus. The masterplan must establish the principles and parameters for future growth and include comprehensive assessments of transport, landscape, ecological, archaeological and heritage impacts. It must be agreed with the Local Planning Authority in consultation with Oxfordshire County Council, and future applications will be determined in accordance with the agreed masterplan. This provides the principal mechanism for ensuring that development comes forward in a coordinated manner across the Campus rather than through a series of unrelated proposals. Please see our response to Question 7.3.9 which sets out how the requirements for the production of a masterplan at Harwell Campus are justified.

Policy AS12 further requires future development to demonstrate how it contributes towards a comprehensive approach to growth. In particular, part 3(c) requires a campus-wide travel plan and modelling of the cumulative traffic impacts of anticipated development across the whole Campus. Part 3(d) requires a comprehensive landscape plan, whilst part 3(g) requires all necessary infrastructure to be identified and addressed using up-to-date evidence and in consultation with Oxfordshire County Council and National Highways. Together, these requirements ensure that infrastructure needs and cumulative impacts are considered at a strategic rather than site-by-site level.

Policy IN1 also applies and requires development to be served and supported by appropriate on-site and off-site infrastructure. The policy requires engagement with infrastructure providers and the delivery of infrastructure necessary to support development. The precise infrastructure requirements, costs, delivery arrangements and phasing will be identified through the masterplanning and development management processes, informed by the latest available evidence and consultation with relevant infrastructure providers.

This approach is supported by the Statement of Common Ground for Harwell Campus (examination library reference LPA73), which records agreement between the councils' and the site promoters that development should come forward in a coordinated manner consistent with the policy framework (paragraphs 3.4, 3.6, 3.7 and 3.8).

We therefore consider that Policies AS12, LS1 and IN1 provide an effective framework for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Harwell Campus, with the masterplanning process providing the mechanism through which infrastructure requirements are identified, coordinated and secured.

Q7.2.12 (AS12) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, we consider the expected timescale and rate of development to be realistic.

Unlike the strategic housing allocations, Policy AS12 is an employment allocation and therefore does not have a housing delivery trajectory or anticipated annual dwelling completions. The appropriate test is whether there is a realistic prospect of the employment development envisaged by the allocation coming forward within the plan period.

Harwell Campus is an established employment location with a strong track record of delivering employment development and supporting infrastructure. The allocation provides for the continued expansion of the Campus in accordance with its long-term development strategy rather than the delivery of a single development scheme.

The Statement of Common Ground between the councils' and the site promoter (examination library reference LPA73) records agreement that "the parties are working jointly to enable delivery of the planned development of employment land within the plan period" (paragraph 4.2). This provides clear evidence that the allocation is actively being progressed and that there is a shared commitment to delivery. The Statement of Common Ground also confirms agreement between the parties that the allocation is suitable, available and deliverable (paragraph 4.1).

Taking these factors together, we are satisfied that the anticipated timescale and rate of development are realistic, with further employment development expected to come forward progressively over the plan period as land is released through decommissioning and remediation.

Q7.2.13 (AS12) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our responses to questions Q.7.2.2, Q7.2.4 and Q7.2.10 above, and why we consider the plan is sound.

Q7.2.14 (AS12) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording "in accordance with" in respect of the Infrastructure Delivery Plan does not appear in this policy.

Q7.2.15 (AS12) Are any modifications necessary in the interests of soundness?

Councils' Response:

There are no modifications necessary in the interests of soundness for Policy AS12: Harwell Campus. The policy is supported by the evidence base, has been demonstrated to be deliverable through the Statement of Common Ground, and provides a clear and effective framework for determining planning applications and guiding the future development of the Campus. We therefore consider the policy to be justified, effective and consistent with national policy.

Policy AS15 – Harcourt Hill Campus

Q7.2.1 (AS15) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The background to the allocation is set out in the supporting text to Policy AS15. Harcourt Hill Campus is one of the three principal campuses occupied by Oxford Brookes University and currently accommodates teaching facilities, student accommodation, sports facilities and associated supporting uses (paragraph 8.108). Harcourt Hill Campus is owned by the Methodist Church, who lease the site to Oxford Brookes University. The Campus occupies a sensitive location within the Oxford Green Belt and on the urban-rural fringe and forms part of the setting of important views towards and from Oxford (paragraphs 8.109-8.110).

Harcourt Hill Campus was previously allocated within the adopted Vale of White Horse Local Plan Part 1 through Core Policy 9: Harcourt Hill Campus (examination library reference ALP03). Core Policy 9 established a masterplan-led approach to guide any significant future change at the Campus and identified a number of key matters requiring coordinated consideration, including landscape integration, transport impacts and the protection of important views towards Oxford. The policy was examined through the Vale Local Plan examination and found sound. In particular, the Inspector considered representations relating to the Green Belt status of the site and concluded that redevelopment of the Campus was unlikely to materially reduce the openness of the Green Belt or affect the setting of Oxford unless development were to take place at a significantly greater height than currently exists (examination library reference LPA99, paragraph 97). The Joint Local Plan therefore builds upon an established and previously examined planning framework for the Campus.

Unlike many of the other allocations in the Joint Local Plan, Policy AS15 does not allocate a specific quantum of housing or employment development. Instead, it provides a policy framework to guide any significant future change at an existing educational campus whose future role is under review. The allocation therefore reflects the presence and strategic importance of the Campus rather than identifying a new location for development. Unlike many of the strategic housing and employment allocations in the Joint Local Plan, Harcourt Hill Campus was not identified through the site selection process described in the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). This is because Policy AS15 does not allocate a specific quantum of development or identify new land for development. Rather, it establishes a planning framework to guide any significant future change at an existing educational campus whose future role is under review. The policy was included because of the strategic importance of Harcourt Hill Campus, the potential for future redevelopment proposals to come forward, and the need to ensure that any such

proposals are planned comprehensively having regard to the site's sensitive Green Belt and urban-rural fringe location.

The principal alternative to the allocation was not to include a site-specific policy and instead rely solely on the generic policies of the Joint Local Plan and national policy. We concluded that this approach would not provide sufficient certainty regarding how any significant future change should be planned and assessed. Given the sensitive location of the site, the potential implications for transport, landscape, Green Belt character, views of Oxford, educational facilities and sports provision, a site-specific policy requiring a comprehensive masterplan was considered the more appropriate option.

These options were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7), which informed our decision to include Policy AS15. The result is a policy that supports the continued educational role of the Campus whilst ensuring that any significant future change is planned comprehensively and in a manner that respects the site's Green Belt setting and urban-rural fringe context.

We therefore consider that the allocation is supported by a clear planning rationale and that the options considered through the plan-making process provide a sound basis for the approach taken in Policy AS15.

Q7.2.2 (AS15) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site area, boundary and development assumptions are justified and based on the available evidence, having regard to site constraints and infrastructure requirements.

Unlike many of the strategic allocations in the Joint Local Plan, Policy AS15 does not allocate a specific quantity of housing or employment development. The policy instead provides a framework for managing any significant future change at the existing Harcourt Hill Campus. Consequently, there is no fixed development capacity assumption against which the site should be assessed.

The allocation boundary reflects the existing extent of Harcourt Hill Campus and is consistent with the approach previously established through Core Policy 9 of the adopted Vale of White Horse Local Plan Part 1 (examination library reference ALP03). The policy area corresponds to the existing educational campus rather than identifying a new area for development.

In their Regulation 19 representation, a local community group expressed concern that the sport and leisure facilities and the greenspace provision on site are used by the local community and should be safeguarded. As set out in The councils'

Response to Key Issues (examination library reference LPA48, page 108 and 109) Policy AS15 requires any development proposals to address key site issues, including the provision or retention of sports facilities. In addition, Policy HP4 (Existing open space, sport and recreation facilities) seeks to protect, maintain and where possible enhance existing open space.

Furthermore, we have proposed Main Modification MM13 for the supporting text of policy AS15 which clarifies that the masterplan should be informed by the findings and recommendations of the adopted Leisure Facilities Assessment and Strategy (examination library reference HPL04.4) and Playing Pitch Strategy (examination library reference HPL06.2). This will help ensure that existing facilities are appropriately retained, enhanced or reconfigured and that future provision continues to meet identified needs.

Greenspace is also protected through Policy HP6 (Green infrastructure on new developments), which requires development to protect or enhance existing green infrastructure. Taken together, Policies AS15, HP4 and HP6, supported by MM13 and the adopted evidence base, provide an effective framework for safeguarding the Harcourt Hill Campus' sport and leisure facilities and the greenspace provision whilst allowing future change to be considered through the masterplanning process.

The policy has been informed by the principal constraints affecting the site, including its location within the Oxford Green Belt, its urban-rural fringe setting, its relationship with important views towards and from Oxford, existing landscape and tree cover, transport considerations, educational and sporting facilities, and the proximity of the Oxford Sewage Treatment Works. These constraints are reflected directly in the policy requirements and supporting text, particularly paragraphs 8.109 and 8.110.

Infrastructure requirements and environmental considerations are addressed through the masterplanning process required by Policy AS15. The policy requires future proposals to be informed by comprehensive assessments of transport, landscape, trees, views, public transport, walking and cycling infrastructure, educational facilities, sports provision and the Oxford Sewage Treatment Works. This ensures that future development is guided by up-to-date evidence and that infrastructure requirements are identified and addressed before significant change takes place. Please see our response to Question 7.3.12 which sets out how the requirements for the production of a masterplan at Harcourt Hill Campus are justified.

We therefore consider that the site boundary is justified, that the policy appropriately reflects the absence of a fixed development capacity, and that the framework established by Policy AS15 provides an appropriate basis for managing future development having regard to site constraints and infrastructure requirements.

Q7.2.3 (AS15) How have the mix of uses been determined?

Councils' Response:

The mix of uses has been determined by the existing role and function of Harcourt Hill Campus, site constraints, and the anticipated future needs of the site.

As explained in supporting text paragraph 8.108, Harcourt Hill Campus is one of the three principal campuses occupied by Oxford Brookes University and currently accommodates teaching facilities, student accommodation, sports facilities and associated supporting uses. Policy AS15 therefore seeks to support the continued use and evolution of the campus primarily for educational purposes rather than introducing a fundamentally new land use pattern.

Accordingly, Policy AS15 refers to the preparation of a masterplan that meets the needs of the campus for predominantly educational uses. The policy also recognises the importance of associated facilities which support the operation of the campus, including student accommodation, sports facilities and related supporting infrastructure. Part 1(b) specifically requires consideration of the provision and retention of educational and sports facilities as part of any future masterplanning exercise. Please see our response to Question 7.3.12 which sets out how the requirements for the production of a masterplan at Harcourt Hill Campus are justified.

The mix of uses has therefore not been determined through a fixed schedule of development quantum or land use percentages. Instead, the policy provides a framework for deciding the right mix of educational and supporting uses through the masterplanning process, taking account of Oxford Brookes University's future needs and the constraints affecting the site.

This approach is justified because the future role of the campus is currently under review, as recognised in paragraph 8.110 of the supporting text. A flexible masterplan-led approach allows the detailed mix of uses to evolve over time whilst ensuring that the site continues to function primarily as an educational campus and that any significant change is appropriately planned and assessed.

We therefore consider that the proposed mix of uses reflects the established role of Harcourt Hill Campus, on site constraints, and future needs and the policy provides an appropriate and flexible framework for accommodating future educational and supporting uses on the site.

Q7.2.4 (AS15) 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?

Councils' Response:

Yes. We consider that the potential adverse effects of significant future development at Harcourt Hill Campus have been identified at an appropriate level for plan-making

and that Policy AS15, together with the relevant Plan-wide policies, provides an effective framework for their assessment and mitigation.

Unlike many of the strategic allocations in the Joint Local Plan, Policy AS15 does not allocate a specified quantum of housing or employment development. It provides a framework for managing significant future change at the existing Harcourt Hill Campus. The precise nature and scale of impacts will therefore depend on the form of any future proposals and will be assessed through the comprehensive masterplanning and planning application processes required by the policy.

The Sustainability Appraisal (examination library reference CSD03, Appendix L, Policy AS15 assessment predicts that the policy requirements will have positive effects in terms of ensuring provision of community facilities with positive health effects (SA Objective 2), ensuring accessibility (SA Objective 3), biodiversity enhancement (SA Objective 4) and avoiding adverse landscape impact (SA Objective 7).

This is a brownfield site located in the Green Belt. Therefore, the potential impacts of developing the site are limited as national Green Belt policy sets out the appropriateness of development/redevelopment on this site.

Notwithstanding this the policy includes reference to the sites' Green Belt setting, along with the need for landscape, tree and planting strategy.

Transport and traffic

Policy AS15 expressly requires the masterplan to address the transport implications of future development. This includes creation of a transport and movement hierarchy which promotes non-car modes and minimises the impact of private vehicles; investment in public transport and pedestrian and cycle infrastructure; appropriate transport assessment; bus-priority measures where appropriate; and contributions to safe and attractive walking and cycling routes.

The scale and form of any necessary transport mitigation will therefore be informed by the development ultimately proposed and assessed through the masterplanning and development management process.

Pollution

The Sustainability Appraisal predicts a neutral effect in relation to pollution for Policy AS15 (examination library reference CSD03, Appendix L, page 358). Potential construction or operational effects arising from any future redevelopment would additionally be subject to the Plan-wide policies relating to air quality, pollution, lighting and contaminated land. We therefore consider that there is an appropriate policy framework to assess future development proposals.

Nature conservation

The Sustainability Appraisal predicts a positive effect in relation to biodiversity (examination library reference CSD03, Appendix L, page 358). Policy AS15 requires development to be integrated into the landscape through a comprehensive landscape, tree and planting strategy, while the Plan-wide nature-recovery policies provide the framework for protecting and enhancing biodiversity and ecological networks.

Landscape, countryside and Green Belt

Harcourt Hill Campus is an existing developed site within the Oxford Green Belt and on the urban-rural fringe. Policy AS15 expressly requires the masterplan to respect this setting and requires built form to be integrated into the landscape through a comprehensive landscape, tree and planting strategy. The Sustainability Appraisal predicts a positive effect against its landscape objective because of the safeguards contained in the policy (examination library reference CSD03, Appendix L, page 358).

The appropriateness of any future development in Green Belt terms will be assessed against national Green Belt policy (as required by Policy SP1) and the relevant Plan-wide policies.

Heritage and views of Oxford

The Sustainability Appraisal predicts a neutral effect in relation to the historic environment (examination library reference CSD03, Appendix L, page 358). Nevertheless, Policy AS15 recognises the site's sensitive visual relationship with Oxford and specifically requires long-distance views from Oxford to be safeguarded and new development not to detract from views of the existing spires by reason of its height or form. This provides a site-specific safeguard through which the height, scale and form of future development can be assessed as part of the masterplanning and planning application process.

Other plan-wide policies address matters where potential impacts could arise.

The one matter of potential impact raised through representations is addressed below:

Flood risk and water management

The updated flood-risk evidence provides a detailed site-specific assessment of Harcourt Hill Campus. The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS15 site assessment) considers fluvial, surface water and groundwater flood risk and identifies the mitigation and further assessment necessary as development comes forward. It confirms that the Exception Test is not required because the site is proposed for less vulnerable uses. The assessment identifies surface water and groundwater as matters that will need to inform the detailed development of the site and sets out requirements for a site-specific Flood Risk Assessment and further work. The policy framework therefore

enables the detailed design and drainage strategy to respond to the identified flood-risk constraints as proposals come forward.

In the councils' Response to the Key Issues (examination library reference LPA48, page 109), we report the Environment Agency's significant concerns regarding the capacity of Oxford Sewage Treatment Works. However, the Environment Agency subsequently updated its position on 22 May 2025 following Thames Water's commitment to a programme of upgrades to Oxford Sewage Treatment Works. The Environment Agency confirmed that these upgrades would provide sufficient capacity to accommodate planned development without causing a deterioration in water quality.

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the allocation is sound in relation to flood risk. The Environment Agency identifies an unmodelled ordinary watercourse to the south of the site, the Seacourt Stream, but confirms that this is not a soundness concern and that the Exception Test is not required.

We therefore consider that the flood-risk and water-management effects of the allocation have been appropriately assessed. The evidence identifies the site-specific flood-risk considerations and the further assessment required, while the updated position regarding Oxford Sewage Treatment Works demonstrates that the identified wastewater-capacity issue can be addressed through the planned infrastructure upgrades and the safeguards provided by the policy framework.

Q7.2.5 (AS15) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As Policy AS15 does not allocate a specific quantum of development and is instead a framework policy to guide any significant future change at the existing Harcourt Hill Campus, it was not initially subject to screening in our 2024 Level 1 Strategic Flood Risk Assessment (SFRA) (examination library reference CEQ11.1, Appendix C). It also was not included in our initial application of the sequential test (examination library reference TOP07.1, Appendix 5).

However, for completeness, Harcourt Hill Campus was subject to screening in our 2025 Level 1 SFRA Addendum (examination library reference LPA44, Appendix B). It was also included in the subsequent re-application of the sequential test (unpublished).

We have included Harcourt Hill Campus in our 2026 Level 1 SFRA Addendum, which will be submitted to the examination at the same time as these hearing statements. As this identifies changes in flood risk to some of the site allocations proposed in the plan, we have reapplied the Sequential Test and consider that the proposed site allocations, including AS15, remain justified on this basis.

We note that Harcourt Hill Campus is not required to pass the exception test as whilst it is proposed for a more vulnerable use it is not located within Flood Zone 3a.

Our updated Sequential Test and Exception Test Paper will be submitted to the examination shortly.

Q7.2.6 (AS15) 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?

Councils' Response:

The precise effect on the highway network will depend upon the nature and scale of any future redevelopment proposals brought forward at Harcourt Hill Campus. Policy AS15 does not allocate a fixed quantity of development and therefore it is neither possible nor appropriate at the plan-making stage to identify a definitive package of highway improvements.

Nevertheless, transport and movement are key considerations within the policy framework. Policy AS15 requires any significant change at the Campus to be guided by a comprehensive masterplan. Part 1(criterion f) requires the creation of a transport and movement hierarchy which promotes non-car modes of travel and permeability across the site and beyond, including measures to minimise the use and impact of private motor vehicles and discourage car-dependent development. Part 1 criterion (g), (h) and (i) further require consideration of public transport investment, pedestrian and cycle infrastructure, transport assessments, bus priority measures and a network of safe and attractive walking and cycling routes.

These requirements provide a clear framework for identifying the potential transport impacts of future proposals and the necessary mitigation measures required to address them. The masterplan process will establish the principles and parameters for future development and will be prepared collaboratively with the councils', Oxfordshire County Council, local residents and other stakeholders. Any subsequent planning application will be required to be supported by appropriate transport evidence and demonstrate how any identified impacts will be mitigated.

We therefore consider that the policy provides a clear and effective framework for identifying and addressing potential transport impacts, whilst allowing the specific necessary mitigation measures and delivery mechanisms to be determined on the basis of detailed evidence when future proposals come forward.

Q7.2.7 (AS15) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

The precise infrastructure requirements and associated costs will depend upon the nature and scale of any future proposals brought forward at Harcourt Hill Campus. Policy AS15 does not allocate a fixed quantum of development and therefore it is neither possible nor appropriate at the plan-making stage to identify a definitive package of infrastructure works or associated costs.

Nevertheless, Policy AS15 identifies the principal infrastructure requirements and site constraints that must be addressed through the masterplanning process. These include educational and sports facilities, transport and movement infrastructure, public transport provision, walking and cycling infrastructure, landscape and tree planting, drainage and wastewater considerations, and the relationship of development to the Oxford Sewage Treatment Works.

The site is subject to a number of physical and environmental constraints. As explained in supporting text paragraphs 8.109 and 8.110, Harcourt Hill Campus occupies a sensitive location within the Oxford Green Belt and the urban-rural fringe. The site forms part of the setting of important views towards and from Oxford, includes substantial tree cover and landscape features, and must be planned in a manner that respects its Green Belt setting and wider landscape context. Transport impacts, dependence on private vehicles and the need to improve sustainable travel choices are also key considerations for any future development.

These constraints are addressed directly through Policy AS15. Part 1 requires any significant change to be guided by a comprehensive masterplan prepared in consultation with Oxfordshire County Council, local residents and other stakeholders. The masterplan must address, amongst other matters:

- the provision and retention of educational and sports facilities;
- landscape integration, trees and planting;
- the protection of long-distance views;
- impacts on the Oxford Sewage Treatment Works;
- transport, movement and accessibility;
- public transport provision;
- pedestrian and cycle infrastructure; and
- bus priority measures where appropriate.

Policy LS1 and Policy IN1 also apply. Together these policies require development to be supported by appropriate infrastructure, informed by relevant technical evidence and delivered in a coordinated manner. The masterplanning process provides the mechanism through which infrastructure needs, delivery arrangements, costs and timing can be identified and secured.

The supporting text explains that the purpose of the masterplan is to ensure that any future change comes forward in a coordinated way, taking account of the site-

specific matters identified in the policy whilst respecting the Green Belt setting and urban-rural fringe context of the site (paragraph 8.110). Please see our response to Question 7.3.12 which sets out how the requirements for the production of a masterplan at Harcourt Hill Campus are justified.

We are therefore satisfied that the principal infrastructure requirements and constraints affecting the site have been identified and that Policy AS15 provides an effective framework through which they can be addressed as future proposals come forward.

Q7.2.8 (AS15) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The land ownership position is well understood and is reflected in the Statements of Common Ground prepared in relation to Harcourt Hill Campus (examination library references LPA60A and LPA60B). The Campus is owned by the Methodist Church, who lease the site to Oxford Brookes University. Westminster College Oxford Trust promotes higher education and training in the interests of the Methodist Church. Both parties have engaged constructively with the Joint Local Plan examination process and have entered into Statements of Common Ground with the councils'.

The purpose of Policy AS15 is not to allocate a specific development scheme or require a particular quantum of development to come forward. Rather, it establishes a framework through which any significant future change at the Campus can be planned and assessed. Consequently, the soundness of the allocation does not depend upon a single promoter, developer or agreed redevelopment proposal.

Whilst the parties have different views regarding the future role and potential development of parts of the site, the parties are working jointly to ensure the optimum outcome for the site and will continue to work cooperatively on all matters of mutual interest (examination library references LPA60A paragraph 4.2 and LPA60B paragraph 5.1). The policy is intentionally structured to accommodate future change through a masterplan-led approach rather than predetermining a specific development outcome.

We therefore consider that there is sufficient certainty regarding land ownership and future stewardship of the site to justify the allocation. The existence of different aspirations for the future of the Campus does not undermine the effectiveness of Policy AS15. Rather, it reinforces the need for the comprehensive masterplanning framework established by the policy.

Q7.2.9 (AS15) How is it intended to bring the site forward for development?

Councils' Response:

Policy AS15 does not seek to bring forward a specific development scheme or allocate a fixed quantum of development. Rather, it establishes a framework for managing any significant future change at the existing Harcourt Hill Campus.

The policy anticipates that any substantial redevelopment, intensification or reconfiguration of the Campus would first be guided by the preparation of a masterplan. Policy AS15 requires the landowner or leaseholder to work proactively with the councils', Oxfordshire County Council, local residents and other appropriate stakeholders to prepare a masterplan for the site. The purpose of the masterplan is to establish a clear vision for the future of the Campus and identify how issues such as transport, landscape, educational and sports facilities, views, public transport, walking and cycling infrastructure, and the relationship with the Oxford Sewage Treatment Works should be addressed.

Once agreed, the masterplan would provide the framework against which future planning applications would be determined. Any future redevelopment proposals would therefore be expected to come forward through the development management process in accordance with the agreed masterplan and the wider policies of the Joint Local Plan. Westminster College Education Trust, who represent the interests of the Methodist Church as owner of Harcourt Hill Campus. support the proposed approach to ensuring any future development at Harcourt Hill Campus is delivered comprehensively and according to an agreed masterplan (examination library reference LPA60A, paragraph 4.1). Please see our response to Question 7.3.12 which sets out how the requirements for the production of a masterplan at Harcourt Hill Campus are justified.

The policy is intentionally flexible because, as recognised in supporting text paragraph 8.110, Oxford Brookes University is reviewing the future role of the Campus. The allocation therefore does not predetermine a specific development outcome but instead provides a mechanism through which future proposals can be planned comprehensively and assessed in a coordinated manner.

The Statements of Common Ground relating to Harcourt Hill Campus demonstrate that the parties are working jointly to ensure the optimum outcome for the site and will continue to work cooperatively on all matters of mutual interest (examination library references LPA60A paragraph 4.2 and LPA60B paragraph 5.1). The masterplan-led approach provides the mechanism through which future aspirations for the Campus can be brought forward in a coordinated and evidence-based manner.

We therefore consider that there is a clear and effective route through which any significant future change at Harcourt Hill Campus can come forward, with the masterplanning process providing the first stage in that process.

Q7.2.10 (AS15) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

Policy AS15 does not seek to bring forward a specific development scheme or allocate a fixed quantum of development. Rather, it is a prospective, non-specific allocation and establishes a framework for managing any significant future change at the existing Harcourt Hill Campus.

(Aspinall Verdi's Viability Report Appendices, examination library reference ITV04.1, page 97, explain that they have not appraised this allocation).

Q7.2.11 (AS15) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework provides an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Harcourt Hill Campus.

Policy LS1 requires proposals for large-scale major development to represent a comprehensive proposal that is informed by relevant technical studies and supported by the necessary infrastructure. The policy requires development to be planned comprehensively and to ensure that infrastructure requirements are properly identified and addressed.

Building upon that framework, Policy AS15 requires the landowner or leaseholder to work proactively with the councils', Oxfordshire County Council, local residents and other appropriate stakeholders to prepare a masterplan for the Campus. The masterplan must establish a clear vision for the future development of the site and identify how key issues will be addressed before significant change takes place.

The masterplan requirement is the principal mechanism for ensuring coordinated development. Policy AS15 requires the masterplan to address a range of interconnected matters including the scale and nature of future development, educational and sports facilities, landscape integration, protection of important views, impacts upon the Oxford Sewage Treatment Works, transport and movement, public transport, walking and cycling infrastructure, and bus priority measures. Considering these issues together through a single masterplan helps ensure that individual proposals contribute towards a coherent long-term strategy for the Campus rather than being brought forward on a piecemeal basis. Westminster College Education Trust, who represent the interests of the Methodist Church as owner of Harcourt Hill Campus. support the proposed approach to ensuring any future development at Harcourt Hill Campus is delivered comprehensively and according to an agreed masterplan (examination library reference LPA60A, paragraph 4.1). Please see our

response to Question 7.3.12 which sets out how the requirements for the production of a masterplan at Harcourt Hill Campus are justified.

Policy IN1 also applies and requires development to be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Future proposals will therefore be required to demonstrate that the infrastructure necessary to support development can be provided and delivered.

The supporting text reinforces this approach. Paragraph 8.110 explains that the purpose of the masterplan is to ensure that development comes forward in a coordinated way, taking account of the site-specific matters identified in the policy and respecting the site's Green Belt setting and urban-rural fringe context.

Together, Policies LS1, AS15 and IN1 provide a clear mechanism through which future development, infrastructure provision and site constraints can be considered comprehensively and coordinated through the masterplanning and development management processes.

Q7.2.12 (AS15) Is the expected timescale and rate of development realistic?

Councils' Response:

Policy AS15 does not identify a fixed development quantum, development trajectory or anticipated rate of delivery. Accordingly, the allocation differs from the strategic housing and employment allocations elsewhere in the Joint Local Plan, where specific assumptions regarding delivery rates and timescales are required.

Instead, Policy AS15 establishes a framework for managing any significant future change at Harcourt Hill Campus. As explained in supporting text paragraph 8.110, Oxford Brookes University is reviewing the future role of the Campus and the policy is intended to guide any future redevelopment proposals that may arise from that review.

The policy therefore does not rely on the delivery of a specified amount of development within a particular timescale. Rather, it requires that any significant change is brought forward through a comprehensive masterplan-led approach that addresses the site's Green Belt setting, urban-rural fringe context, transport implications, educational facilities, sports provision and other site-specific considerations.

We therefore consider that the policy is realistic and effective because it does not depend upon a fixed development programme. Instead, it provides an appropriate framework through which future proposals can be planned and assessed should significant change at the Campus come forward during the plan period.

Q7.2.13 (AS15) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. Specifically, we have explained how the policy responds to the existing role of Harcourt Hill Campus, its sensitive Green Belt and urban-rural fringe setting, and the need for any significant future change to be planned comprehensively through a masterplan-led approach.

The policy provides an effective framework for managing future development by identifying the key site-specific matters that must be addressed through masterplanning and subsequent planning applications. It also allows sufficient flexibility to respond to the future needs of the Campus whilst ensuring that impacts on landscape, transport, educational and sporting facilities, important views, and other site-specific considerations are properly assessed and if required mitigated.

Q7.2.14 (AS15) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording "in accordance with" in respect of the Infrastructure Delivery Plan does not appear in this policy.

Q7.2.15 (AS15) Are any modifications necessary in the interests of soundness?

Councils' Response:

There are no modifications necessary in the interests of soundness for Policy AS15: Harcourt Hill Campus. The policy is supported by the evidence base, and provides a clear and effective framework for determining planning applications and guiding the future development of the Campus. We therefore consider the policy to be justified, effective and consistent with national policy.

Policy AS16 – Vauxhall Barracks, Didcot

Q7.2.1 (AS16) What is the background to the site allocation? How was it identified and which options were considered?

Councils' Response:

The Statement of Common Ground for Vauxhall Barracks (examination library reference LPA61, section 2, page 2) details the background to the site allocation.

The South Oxfordshire Local Plan 2035 (examination library reference ALP01) allocated the site via Policy H2: New Housing in Didcot (saved from the South Oxfordshire Core Strategy 2012), to deliver an indicative dwelling capacity of 300 new homes. The allocation was subject to examination with the outcomes recorded in the South Oxfordshire Local Plan 2035 Inspector's Report (examination library reference LPA101). In that report, the Inspector considered Policy H2: New Housing in Didcot within his analysis of Didcot, and concluded that a "realistic and reasonable approach" had been presented to development in Didcot, which would allow the town to "grow substantially and play an important part in the spatial strategy whilst ensuring adequate control over growth, phrasing and infrastructure provision" (paragraphs 178-183).

The site (consisting of two parcels) is currently used for military purposes, containing offices and other ancillary buildings, tennis courts, training areas and playing fields.

As background, "A Better Defence Estate"[23] was published by the Government in November 2016. This report identified 91 sites operated by the Ministry of Defence (MOD) to be released for development to deliver 55,000 homes as part of the Government's wider housing policy. Vauxhall Barracks was one of the sites identified for disposal in this paper, reconfirmed in 2024 for vacating by 2034. There is an opportunity to redevelop the land to improve this key gateway to the town at Station Road / Foxhall Road.

Regarding how the site was identified, the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1) explains our site selection methodology for the residential and employment site allocations in the Joint Local Plan. Firstly, it sets out how we reviewed the allocations in the existing, adopted Local Plans to determine whether they were still appropriate to allocate. Then it sets out how we identified alternative sites to test against these, and the process we went through to assess them.

TOP07.1 pages 48-50 provide a detailed assessment of this site against three tests derived from the Planning Practice Guidance, to determine whether it remained available, achievable, and suitable for development. These pages also show the options available to consider for the site – i.e. whether to allocate or deallocate it.

[23] Ministry of Defence (MoD) (2016) A Better Defence Estate, available at: https://www.gov.uk/government/publications/better-defence-estate-strategy

The preferred option was to "retain the current allocation, subject to changes to demonstrate design requirements for the site". The allocation was "recommended to be retained in the Joint Local Plan".

These options and reasonable site alternatives were tested through the Sustainability Appraisal (examination library reference CSD03, sections 4.6 and 4.7).

Q7.2.2 (AS16) Are the site areas, boundaries and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Councils' Response:

Yes, the site areas, boundaries and capacity assumptions are justified and based on available evidence, having regard to any constraints and the provision of necessary infrastructure.

The boundary and capacity of the site allocation was found sound by the Inspector of the South Oxfordshire Local Plan 2035 (examination library reference ALP01) when it was first allocated for development. Please see the Inspector's report (examination library reference LPA101, paragraphs 178-183). That plan was adopted by SODC in December 2020.

In preparing the Joint Local Plan and site boundary plan, we have considered a range of evidence, including those relating to site constraints and infrastructure requirements. Specific matters relating to constraints, infrastructure provision and deliverability are addressed in more detail in our response to Questions 7.2.4 – 7.2.7, 7.2.10 and 7.2.13.

As stated in paragraphs 3.11 and 3.12 in the Statement of Common Ground for this site (examination library reference LPA61), it is common ground between us and the promoters that the policy is robust and soundly based and that that approximately 300 dwellings can be delivered within the site allocation boundary.

Q7.2.3 (AS16) How have the mix of uses been determined?

Councils' Response:

This allocation is for residential use, along with inclusion of public open space and green infrastructure.

The South Oxfordshire Local Plan 2035 established the residential number of approximately 300 units. Please see our response to Q7.2.1 for the background to this use and its reassessment.

Q7.2.4 (AS16) 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?

Councils' Response:

Yes, we consider that the safeguards and mitigation contained within Policy AS16, together with the relevant Plan-wide policies, are appropriate to address the potential adverse impacts arising from development at Vauxhall Barracks.

The potential adverse impacts associated with the allocation, and the measures available to avoid or mitigate them, were considered through the Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS16 assessment, pages 38-40). These effects have informed the safeguards and mitigation requirements incorporated into Policy AS16 and the relevant Plan-wide policies.

A number of representations raised potential adverse impacts of developing the site. We responded to the majority of these concerns in the councils' Response to Key Issues, (examination library reference LPA48, pages 110-112). However, in the sections below we have addressed the potential adverse impacts in turn, with the steps we have taken to mitigate them - and have highlighted where representations have been made regarding these.

Transport/traffic

The transport implications of the allocation have been considered through our transport evidence base (including transport modelling (examination library reference ITV03, Transport Modelling Report) and infrastructure planning (ITV02, Study of Active Travel for Allocations, LPA17, Infrastructure Delivery Plan, Transport Safeguarding Topic Paper TOP10.2)). The Study of Active Travel for Allocations (examination library reference ITV02, paragraphs 3.8.1–3.8.4) identifies that the allocation lies within the Didcot Local Cycling and Walking Infrastructure Plan area, which provides connections to residential and commercial areas in and around Didcot. National Cycle Network route 5 passes the north-eastern corner of the allocation and the safeguarded Didcot Central Corridor extends along its northern boundary. The assessment also identifies missing connections to the Didcot Local Cycling and Walking Infrastructure Plan network and the National Cycle Network.

These findings directly informed Policy AS16. The Study of Active Travel for Allocations explains that the policy wording was revised to take these matters into account, including a requirement for development to contribute towards a network of safe and attractive walking and cycling routes identified in the Didcot Local Cycling and Walking Infrastructure Plan and enhanced links to National Cycle Network routes 5 and 544 (ITV02)).

Policy AS16 also requires all necessary transport infrastructure and mitigation measures to support the development. The Infrastructure Delivery Plan (examination

library reference LPA17) identifies the infrastructure requirements for the Didcot allocations, while the comprehensive masterplanning of Vauxhall Barracks provides the mechanism for coordinating infrastructure provision and development phasing. A Transport Assessment at planning application stage will establish the precise form and timing of necessary mitigation.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS16 assessment, pages 38 – 40) identifies moderate positive effects overall in relation to sustainable travel. The site is well located with Didcot Parkway train station, seven bus stops (served by various, frequent services), National Cycle Route #5 and multiple Public Rights of Way all within walking distance.

Policy AS16 provides for mitigation through walking, cycling and bus infrastructure. Transport Assessment at application stage will establish the precise form and timing of necessary mitigation.

Overall, we consider that the transport effects of the allocation have been assessed at an appropriate level for plan-making and that Policy AS16 provides an effective framework for securing the necessary sustainable transport, active travel and wider transport mitigation. Please also see our response to Question 7.2.6 regarding the effects on the highway network.

Pollution

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS16 assessment, pages 38 - 40) predicts minor adverse effects in relation to pollution at Vauxhall Barracks, particularly during the construction phase when activities may contribute to air and noise pollution effects to residents to the north.

The site is also in close proximity to a major railway line, the A4130 and Foxhall Road (B4493) which are predicted to serve as noise and air pollution sources for new residents, particularly those in the northern portion of the site. Given its urban setting, the site does not fall within a Dark Skies Zone or within an area of high tranquillity.

The SA identifies appropriate mitigation through production of a Construction Environmental Management Plan, to reduce construction noise contamination, water quality and air quality impacts. Site design should also incorporate measures which seek to minimise air-quality and light pollution effects.

These matters are addressed through the Plan-wide requirements of Policies CE9–CE12 and LS1 relating to air quality, pollution sources and receptors, light pollution and contaminated land. Policy AS16 also stipulates that development proposals must be informed by an assessment of the potential noise impacts from the existing railway line and mitigation measures required to provide an adequate buffer.

Overall, we consider that the identified potential pollution effects can be appropriately mitigated through the site-specific and Plan-wide policy requirements.

Nature conservation and biodiversity

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS16 assessment, pages 38 - 40) predicts neutral effects on biodiversity. The site is currently used as an army barracks, with the south-west corner in agricultural use. There are areas of greenspace bounded by hedgerows and small pockets of woodland which may support protected / notable species which could be impacted by the works. However, there are no formal ecological designations in and around the site.

The Habitats Regulations Assessment (HRA) Appropriate Assessment (examination library reference CSD04.1) considered a range of impact pathways by which policies in the Joint Local Plan could give rise to adverse effects to the integrity of a designated European Site, either alone or in combination with other plans and projects.

Read together, the AA report and its Atmospheric Pollution Addendum (examination library reference LPA43) conclude that the Joint Local Plan is compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant, Chiltern Beechwoods, Cothill Fen, Hackpen Hill, Hartslock Wood, Kennet & Lambourn Floodplain, Little Wittenham, Oxford Meadows and River Lambourn Special Areas of Conservation, for all impact pathways, including atmospheric pollution.

Natural England agrees with the HRA conclusions in its Statement of Common Ground with the councils' (examination library reference LPA47, paragraphs 3.1-3.8 and 5.1).

Overall, we consider that the potential effects on nature conservation have been appropriately assessed and that the site-specific and plan-wide policy safeguards provide an effective framework for mitigation and ecological enhancement.

Landscape and countryside

This is an urban regeneration site, within Didcot Garden Town, and as such it can play a part in ensuring its development contributes to the policy requirement for the Garden Town as set out in Policy SP3.

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS16 assessment, pages 38 - 40) predicts neutral effects in relation to landscape. The site is located further than 2km from any National Landscape and adverse effects to designated landscapes are therefore unlikely. The extent of any more localised landscape and visual effects will be dependent on the scale, layout and massing of the development coming forward. Given its urban setting, the site does not fall within a Dark Skies Zone or in an area of high tranquillity.

Policy AS16 requires development proposals to be informed by a landscaping scheme which includes provision for the protection and maintenance of important

trees on the site and provides for the retention and maintenance of the memorial garden. Plan-wide policies, such as NH6 Landscape, provide a comprehensive set of policies in respect of the landscape and countryside.

Overall, we consider that the policies of the plan provide an appropriate framework to mitigate any potential landscape effects.

Heritage assets

The Sustainability Appraisal (examination library reference CSD03, Appendix J, Policy AS16 assessment, pages 38 - 40) predicts minor adverse effects in relation to the historic environment for Vauxhall Barracks. The site is within 500 m of 14 Grade II, and one Grade II* Listed Buildings. Most of these features are located within the nearby Didcot Old Conservation Area. Direct impacts are not likely, however impacts to the setting of the designated features are possible, depending on the nature and scale of development coming forward.

Flood risk and water management

The updated flood-risk evidence identifies a very low level of fluvial and surface water flood risk at Vauxhall Barracks. The Level 2 Strategic Flood Risk Assessment Update (examination library reference LPA45, AS16 site assessment) confirms that the site is not within Flood Zone 3a and therefore does not require the Exception Test. It concludes that it should be appropriate for the site to be allocated given the very low level of fluvial and surface water flood risk. It also identifies negligible groundwater flood risk across the site. The assessment nevertheless identifies the need for updated climate-change modelling to establish future surface water flood risk and confirms that this can appropriately be undertaken through a site-specific Flood Risk Assessment. It also requires a drainage strategy for new development and identifies that the potential use of infiltration sustainable drainage systems should be investigated.

The Water Cycle Study Detailed Report (examination library reference LPA46, section 4.3.6) identifies Vauxhall Barracks as one of the residential allocations draining to Didcot Sewage Treatment Works. It identifies that the works' permitted dry-weather flow is currently 11,476 m³/day and that existing dry-weather flow is already exceeding the permit, with further planned development expected to add significantly to flows.

The councils' Response to Key Issues (examination library reference LPA48, page 110-111) similarly records the Environment Agency's concern regarding capacity at Didcot Sewage Treatment Works and its position that improvements would be required to accommodate development. Our response explains that wastewater capacity and water-quality effects have been considered through the Water Cycle Study process, alongside engagement with the Environment Agency and Thames Water. It also explains that, where wastewater infrastructure capacity constraints are identified, Policy CE8 requires the delivery of development to be aligned with

sufficient new or upgraded wastewater infrastructure, including the use of phasing and Grampian conditions where appropriate (LPA48, pages 70–71).

The Statement of Common Ground with the Environment Agency (examination library reference LPA67, Appendix 1) confirms that the allocation is sound in relation to flood risk. The Environment Agency confirms that there are no flood-risk concerns and that the Exception Test is not required.

We therefore consider that the flood-risk and water-management effects of the allocation have been appropriately assessed. The flood-risk evidence demonstrates that the site is appropriate for allocation, subject to the further detailed assessment and drainage measures identified, while the Water Cycle Study identifies the capacity constraint at Didcot Sewage Treatment Works and the policy framework provides a mechanism for ensuring that development is aligned with the necessary infrastructure improvements.

Taken together, Policy AS16, the relevant Plan-wide policies and the identified site-specific mitigation provide a sufficiently effective framework to address the potential adverse impacts of development. The evidence base demonstrates that the principal effects have been identified at an appropriate level for plan-making and that the remaining detailed mitigation can be secured through masterplanning, technical assessment and the planning application process. We therefore consider that the policy safeguards and proposed mitigation are sufficiently effective.

Q7.2.5 (AS16) Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Councils' Response:

As detailed in our response to Q7.2.5 for AS1 - Berinsfield Garden Village, the Sequential Test and the Exception Test (where relevant) were applied as part of our site selection process, as set out in our Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper (examination library reference TOP07.1). We have reapplied the tests when our SFRA has been updated to ensure the proposed site allocations remain justified.

We have reapplied the Sequential Test using the recently completed 2026 Level 1 SFRA and this demonstrates that the proposed site allocations remain justified on this basis.

We have been unable to complete the Exception Test update at the current point in time as the Level 2 SFRA 2026 update is in progress, but we will endeavour to do this as soon as possible. However, our SFRA consultants have advised that none of the changes in flood risk identified are likely to affect the ability of proposed site allocations to pass the Exception Test (where this is required). The outcomes of this process are therefore unlikely to change previous conclusions that the proposed site

allocations pass the Exception Test (where this is required) and are justified on this basis.

We note that this site is not required to pass the Exception Test as it is not located in Flood Zone 3a.

Q7.2.6 (AS16) 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?

Councils' Response:

All anticipated impacts of the allocation on the highway network(s) have been assessed using the Oxfordshire Strategic Model (examination library reference ITV03 - Transport Modelling Report), supported by proportionate evidence prepared for plan-making purposes (examination library references ITV01 - Existing Transport Conditions Report, ITV02 - Study of Active Travel for Allocations, LPA17 - Infrastructure Delivery Plan, Transport Safeguarding Topic Paper TOP10.2, and Spatial Strategy Topic Paper TOP08.2). The modelling assessment identified the transport impacts arising from the cumulative growth proposed in the Joint Local Plan and relevant mitigation schemes have been proposed to ensure that those impacts can be appropriately managed.

Where transport mitigation is required, the site policy (Joint Local Plan, examination library reference CSD01) identifies the necessary highway and sustainable transport infrastructure, with further detail provided within the Infrastructure Delivery Plan (IDP, examination library reference LPA17). The IDP sets out the nature of the required improvements, the expected delivery mechanisms and responsibilities, and the anticipated timing of delivery.

The mitigation requirements for this allocation demonstrate the "opportunities to promote walking, cycling and public transport use have been identified and pursued" in accordance with paragraph 108(c) of the NPPF. Mitigation requirements include walking and cycling infrastructure, with specific reference to the Didcot Local Cycling and Walking Infrastructure Plan (LCWIP, which can be found here, this forms part of the Local Transport and Connectivity Plan, examination library reference LNP10, pages 38-40), as well as provision for public transport.

Any future application will also need to accord with other transport policies in the JLP, e.g. Policy IN2 which requires applications to apply the Transport User Hierarchy when planning transport infrastructure.

The level of assessment and identified mitigation is proportionate to the strategic nature of the Joint Local Plan. The evidence underpinning the allocation and its associated mitigation has been reviewed as part of preparation of the Joint Local Plan and remains appropriate. The transport mitigations identified for this allocation

align with national policy, local transport policy, background traffic growth assumptions, and anticipated travel behaviours.

The transport modelling work was undertaken by consultants Atkins Réalis to support the JLP and was led by Oxfordshire County Council (OCC). As set out in OCC's Regulation 19 representation (a link to the representation is included in Strategic Planning Oxfordshire County Council's Regulation 19 representation), they consider the transport modelling work to be robust and proportionate. In their view the modelling outputs provide suitable evidence to demonstrate that the Joint Local Plan is sound from a transport perspective. The detailed modelling outputs were also reviewed by National Highways (NH). As set out in the Statement of Common Ground (examination library reference DUC04, page 3) NH confirm their view that the JLP evidence and supporting documents are robust and proportionate to inform the development of the Joint Local Plan and its policies.

Q7.2.7 (AS16) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Councils' Response:

Policy AS16 is supported by the Infrastructure Delivery Plan (examination library reference LPA17), which identifies the infrastructure required to support the development of Vauxhall Barracks. A comprehensive list of the infrastructure requirements for Didcot sites is provided in Section 5 of the IDP (pages 26-27).

Policy IN1 – Infrastructure and Service Provision, states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. The policy highlights, amongst other things, that the infrastructure and services are defined in the Infrastructure Delivery Plan.

Policy AS16 highlights the main infrastructure requirements of this site:

- Part 2(g) requires all necessary transport infrastructure and mitigation measures to support the development
- Part 2(f) requires inclusion of open space and green infrastructure provision
- Part 2(f) also requires the retention / equivalent reprovision of the playing field, children's play provision and tennis courts on the site

Additionally, Policy LS1 (Proposals for large scale major development), which is applicable to the site allocation at Vauxhall Barracks, requires in part 1e that development proposals must ensure that necessary supporting infrastructure is provided. Developers must engage with relevant infrastructure providers to ensure the implementation of the Infrastructure Development Plan. Together with the other requirements of Policy AS16, these provisions provide the framework for securing the infrastructure identified in the IDP.

The main physical constraints relating to the allocation are the numerous important trees and a memorial garden on the site. These matters are addressed through the requirements of Policy AS16.

The infrastructure requirements, costs and delivery arrangements will ultimately be determined through the development management process, informed by the latest IDP and the requirements of infrastructure providers. This is a standard and appropriate approach, as the precise infrastructure package and delivery programme will depend on the detailed proposals for the site and infrastructure capacity at the time development comes forward. The comprehensive masterplan will ensure that infrastructure provision and development phasing are planned and delivered in a coordinated manner across the allocation.

We are therefore satisfied that the infrastructure requirements and associated constraints have been identified through the IDP and are appropriately addressed through the requirements of Policies IN1, AS16 and LS1, with the precise infrastructure package, costs and phasing to be agreed through the development management process, having regard to the latest available evidence.

Q7.2.8 (AS16) What is the situation in relation to land ownership and developer interest?

Councils' Response:

The position regarding land ownership is set out in the Statement of Common Ground for Vauxhall Barracks (examination library reference LPA61). Paragraphs 3.2-3.3 confirm that the site is under single ownership control (of the Defence Infrastructure Organisation – DIO) and is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development.

As background, "A Better Defence Estate"[24] was published by the Government in November 2016. This report identified 91 sites operated by the Ministry of Defence (MOD) to be released for development to deliver 55,000 homes as part of the Government's wider housing policy. Vauxhall Barracks was one of the sites identified for disposal in this paper, reconfirmed in 2024 for vacating by 2034.

There is clear evidence of promoter interest in bringing the site forward once military site disposal of it has completed. Our latest five-year housing land supply statement (examination library reference LPA97, pages 134-137) confirms that the planned disposal remains as 2034, as the site is still currently used for operational military purposes.

[24] Ministry of Defence (MoD) (2016) A Better Defence Estate, available at: https://www.gov.uk/government/publications/better-defence-estate-strategy

We are therefore satisfied that there is a clear landownership position, promoter engagement with the site and no landownership or developer interest issues that would prevent the allocation from coming forward within the plan period and in accordance with the proposed trajectory.

Q7.2.9 (AS16) How is it intended to bring the site forward for development?

Councils' Response:

The site promoter advises, through the latest five-year housing land supply statement (examination library reference LPA97, pages 134-137), that the site is intended to be brought forward with submission of a planning application closer to the site disposal date (scheduled for 2034).

The promoter has indicated that development could be delivered through at least one sales outlet and that a housebuilder or developer will be identified closer to site disposal, at which stage the number of developer outlets will be confirmed.

The statement confirms that Oxfordshire County Council has started early construction work on a suite of transport infrastructure improvements around Didcot, expecting these works to intensify throughout 2026. These improvements, collectively known as Housing Infrastructure Fund 1 (HIF1), include a new Thames Crossing, a bypass for Clifton Hampden, a new bridge over the A4130 and railway to the west of Didcot, and the dualling of the A4130. The investment in, and delivery of, this infrastructure is enabling and supporting development in and around Didcot, including this site.

The statement also confirms that "the DIO have instructed the preparation of a suite of technical studies to inform a masterplan and vision document" and that "the site promoter regularly meets on behalf of and with DIO in attendance with the Planning Policy team' at the councils' 'to discuss the sites within their ownership identified for upcoming disposal".

We are therefore satisfied that work will be underway to progress the site once disposal has completed, and that there is a clear route to the submission of a planning application and subsequent delivery of the allocation.

Q7.2.10 (AS16) Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?

Councils' Response:

Given the scale of this site, the Viability Report (examination library reference ITV04) tested this site as a Typology. This site was represented by Typology BV (Table 8.14, p86). This appraisal determined that this site had "marginal viability".

In the Aspinall Verdi report, "marginal viability" means that the policy-compliant Residual Land Value is positive, but less than the notional Benchmark Land Value.

This is in the context of Oxfordshire which is a very high market value area of the country. Whilst AspinallVerdi have found this site to be "marginal" in high-level viability modelling for Local Plan viability, it is fully anticipated that this scheme will be brought forward once detailed design and value engineering is carried out in respect of the required infrastructure (even if this means negotiations must take place on land values/profit margins).

Based on a Benchmark Land Value of £1,008,000 per net acre, the scheme generated a Residual Land Value of £829,181 per net acre and an overall deficit of minus £178,819. Sensitivity testing concluded that the scheme could become viable at a reduced BLV of £950,000 per net acre (see report appendices in examination library reference ITV04.1).

The following sensitivity scenario draws on the original AspinallVerdi appraisals and demonstrates the impact of changing costs and values on the scheme viability. At the baseline position (100% build costs and 100% sales values), the scheme generates a loss of minus £178,819 per net acre, as concluded in the original report (examination library reference ITV04, Table 8.14):

		Build Costs 105% = 5% Increase 50%						
Balance (RLV - BLV £ per acre (n))	(178,819)	55%	70%	85%	100%	115%	130%	145%
	90%	751,828	352,154	(48,980)	(453,776)	(872,825)	(1,391,868)	(2,929,048)
	92%	806,192	406,586	5,609	(398,608)	(814,372)	(1,317,838)	(2,361,913)
Market Values	94%	860,557	461,017	60,197	(343,544)	(756,817)	(1,244,351)	(1,805,621)
100%	96%	914,921	515,432	114,741	(288,560)	(699,898)	(1,171,375)	(1,728,536)
(105% = 5% increase)	98%	969,278	569,826	169,270	(233,655)	(643,445)	(1,098,880)	(1,652,115)
	100%	1,023,620	624,220	223,798	(178,819)	(587,338)	(1,026,673)	(1,576,325)
	102%	1,077,962	678,614	278,307	(124,012)	(531,503)	(961,558)	(1,501,173)
	104%	1,132,304	733,009	332,783	(69,281)	(475,879)	(900,283)	(1,426,602)
	106%	1,186,647	787,403	387,259	(14,553)	(420,435)	(840,659)	(1,352,545)
	108%	1,240,989	841,797	441,735	40,103	(365,126)	(782,182)	(1,278,972)
	110%	1,295,331	896,191	496,211	94,759	(309,928)	(724,523)	(1,205,852)
	112%	1,349,673	950,563	550,648	149,377	(254,818)	(667,470)	(1,133,155)
	114%	1,404,015	1,004,927	605,080	203,965	(199,814)	(610,859)	(1,060,794)
	116%	1,458,358	1,059,291	659,511	258,553	(144,868)	(554,594)	(990,811)
	118%	1,512,700	1,113,656	713,942	313,113	(89,964)	(498,601)	(928,948)
	120%	1,567,042	1,168,020	768,374	367,642	(35,143)	(442,827)	(867,998)
	122%	1,621,384	1,222,385	822,805	422,170	19,671	(387,241)	(808,493)
	124%	1,675,727	1,276,749	877,214	476,698	74,403	(331,798)	(750,000)
	126%	1,730,069	1,331,114	931,608	531,202	129,134	(276,475)	(692,265)
	128%	1,784,411	1,385,478	986,002	585,678	183,818	(221,250)	(635,079)
	130%	1,838,753	1,439,843	1,040,396	640,154	238,473	(166,137)	(578,334)

This table demonstrates that an uplift in values of 8% would be sufficient to achieve viability at the adopted BLV. Should build costs increase by 15%, then the sales values would need to increase by 22% to achieve a viable position. Although house prices have seen little growth since the study was undertaken, this is unlikely to persist over the plan period. Values in the area have been relatively resilient, and it is expected that the market will return fairly quickly in this area on stabilisation of the wider economy.

The appraisals produced suggest that with relatively minor adjustments, were the landowner to accept a 6% reduction in BLV say, then the scheme could be viable and deliverable.

On this basis, and although the site is currently shown to be marginal in viability terms, we consider that Vauxhall Barracks, including the mix of uses on the site, will be viable and deliverable over the plan period.

Q7.2.11 (AS16) What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?

Councils' Response:

The policy framework and associated delivery mechanisms provide an effective basis for ensuring a comprehensive and coordinated approach to development and infrastructure provision at Vauxhall Barracks.

Policy LS1 states that proposals for large scale major development must represent a comprehensive proposal that is well integrated with neighbouring uses where appropriate. It also requires that proposals must ensure that necessary infrastructure is provided, including social and community infrastructure, and that they must include a comprehensive masterplan for the entire site that is informed by relevant technical studies.

In accordance with the requirement in Policy LS1 that necessary infrastructure is provided and that proposals are well integrated with neighbouring uses, Policy AS16 requires integration with the adjacent Great Western Park neighbourhood and inclusion of all necessary infrastructure based on up-to-date evidence on the impact of the development.

The Statement of Common Ground (examination library reference LPA61, paragraph 3.13) records agreement that the general requirements identified in Policy LS1 and the site-specific requirements set out in Policy AS16 identify the key requirements for this site to deliver.

Policy IN1 (Infrastructure and Service Provision) states that new development must be served and supported by appropriate and adequate on-site and off-site infrastructure and services. Infrastructure requirements for Vauxhall Barracks are identified through the Infrastructure Delivery Plan (examination library reference LPA17, pages 26-27) and will be secured through the planning application process, including through planning obligations, conditions and engagement with Oxfordshire County Council and relevant infrastructure providers.

The above policy requirements provide an effective framework for coordinated development and the timely provision of necessary infrastructure.

Q7.2.12 (AS16) Is the expected timescale and rate of development realistic?

Councils' Response:

Yes, the projected timescale and rate of development is realistic, as set out on page 137 of the South Oxfordshire Housing Land Supply Statement (examination library reference LPA97). Page 136 of LPA97 sets out the conclusions made in respect of the development trajectory of the site, with the key conclusions being:

- The DIO confirmed that instructed the preparation of site technical studies to support masterplanning and transport proposals for the site. A planning application will be submitted closer to when the site will be disposed of by the DIO, which is anticipated to be in 2034.
- The councils' lead in time analysis shows that on average, sites of this size take around 3.9 years to deliver homes from submission of an outline application. This timetable would therefore place first completions on this site from around 2038. The trajectory provided by the DIO is in general accordance with this, expecting the delivery of homes towards the end of the 2037/38 monitoring year.
- Using our average build out rate for sites of this size, we would expect the developer to deliver around 54 units a year. The DIO have anticipated 55 homes delivered per annum, again in general accordance with the district averages.

Q7.2.13 (AS16) Are the policy requirements justified, effective and consistent with national policy?

Councils' Response:

Yes, the policy requirements are justified, effective and consistent with national policy. We justify this position with our responses to the preceding questions, and in particular Q7.2.1-7 and Q7.2.10-12. We have responded to specific soundness points raised in representations in our response to question Q7.2.4 above, and explain why we consider the plan is sound.

Q7.2.14 (AS16) Are requirements for delivery to be 'in accordance with' the infrastructure delivery plan justified given that it is not part of the development plan?

Councils' Response:

The wording "in accordance with" in respect of the Infrastructure Delivery Plan does not appear in this policy.

Q7.2.15 (AS16) Are any modifications necessary in the interests of soundness?

Councils' Response:

No, there are no proposed modifications to this policy in the interests of soundness.

Site Specific Responses

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?

Councils' Response:

The Joint Local Plan contains a number of safeguards to ensure that the proposed development is integrated with the existing settlement of Berinsfield and contributes directly to its regeneration.

In relation to integration, Policy AS1 requires the preparation of a comprehensive masterplan for the whole allocation. Policy AS1 part 2(b) requires proposals to demonstrate "how the proposed development is designed to facilitate the regeneration of Berinsfield, including how it interacts and connects with the wider, existing village in accordance with the strategy for Policy AS13 (Berinsfield Garden Village)."

This requirement is reinforced through Policy AS13, which establishes the Garden Village principles for Berinsfield and seeks to ensure that the existing village and proposed development are planned as a single, cohesive community rather than as separate places. In particular, part 2(d) seeks to create a strong sense of place through a connected Garden Village with attractive walking and cycling links between the existing village, new development and the surrounding countryside. This is complemented by Policy AS1 part 2(c), which requires proposals to demonstrate how walking and cycling permeability will be achieved between the existing and proposed settlement and to other key employment, retail and leisure destinations. The indicative concept plan supporting Policy AS1 reflects this approach through the provision of green infrastructure and green links between the allocation and the existing settlement, with a local centre located adjacent to the existing village to encourage interaction between existing and new communities.

Policy AS1 also requires new facilities, services and infrastructure to be planned comprehensively as part of the wider Garden Village. This includes community facilities, education provision, employment land, walking and cycling infrastructure and public transport improvements. Policy AS1 part 2(b) specifically requires development to demonstrate how it will facilitate the regeneration of Berinsfield and interact and connect with the existing village. This objective is reinforced by supporting text paragraph 8.12, which states that the expansion of Berinsfield is considered acceptable only where it directly leads to the regeneration of the village, and paragraph 8.14, which identifies the regeneration package that new

development is expected to support. Read alongside the Garden Village principles in Policy AS13, these requirements are intended to ensure that growth benefits both the new development and the existing settlement and that the two function together as a single community.

The regeneration objectives embedded within Policies AS1 and AS13 are further supported by the Draft Berinsfield Garden Village Regeneration Strategy (which will be submitted to the examination alongside this Matters statement), endorsed by South Oxfordshire District Council's Cabinet on 8 October 2026 as the council's corporate regeneration framework for Berinsfield. The Regeneration Strategy remains a draft, subject to further amendment in response to the Joint Local Plan examination, local government reorganisation and ongoing engagement with relevant partners, before final approval and adoption.

The Regeneration Strategy brings together local evidence and community and stakeholder engagement to identify regeneration priorities and potential delivery opportunities. It provides an evidence-based starting point for defining the necessary regeneration package associated with Mount Farm, alongside wider opportunities that may be progressed through council and partner projects, other development and external funding.

It does not introduce new planning policy requirements, establish a fixed schedule of planning obligations or require Mount Farm to deliver every opportunity identified.

Rather, it provides a framework for implementing the regeneration objectives already embedded within Policies AS1 and AS13.

The specific regeneration package associated with the proposed development will be established through the planning application process, having regard to the development plan, the regeneration purpose of the allocation, the effects of the proposal, infrastructure and service-provider evidence, and viability. Where planning obligations are relied upon, each obligation must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. The Regeneration Strategy's priorities should inform that assessment but would not displace these tests. The package would also be considered alongside the infrastructure and mitigation requirements identified through the Infrastructure Delivery Plan, recognising where individual measures contribute to both infrastructure provision and regeneration.

[PROPOSED MODIFICATION] Policy AS1, part 2(a)

> a) that the applicants have prepared a comprehensive masterplan taking into consideration the indicative concept plan (Figure 8.1), **the Berinsfield Garden Village Regeneration Strategy,** and the councils' Joint Design Guide.

[PROPOSED MODIFICATION] Policy AS1, part 2(b)

b) how the proposed development is designed to facilitate the regeneration of Berinsfield, including how it interacts and connects with the wider, existing village in accordance with the strategy for Policy AS13 (Berinsfield Garden Village) **and having regard to the Berinsfield Garden Village Regeneration Strategy**;

[PROPOSED MODIFICATION] Policy AS1, part 2(d)

d) how the necessary regeneration package has been identified and will be delivered, referring to the Infrastructure Delivery Plan **and the Berinsfield Garden Village Regeneration Strategy**, which is likely to include the refurbishment and expansion of the Abbey Sports Centre and library to accommodate new community facilities in a “community hub”. This may include new premises for an expanded health centre or alternatively premises for a new health centre provided within the new development;

[PROPOSED MODIFICATION] Policy AS1, part 2(f)

f) a total affordable housing provision in accordance with Policy HOU3 (Affordable housing) **and having regard to the Berinsfield Garden Village Regeneration Strategy**, with a site specific mix of affordable tenures informed by robust local evidence that seeks to address existing local need, as well as rebalance the mix of housing tenures across the Garden Village;

[PROPOSED MODIFICATION] Policy AS1, part 2(h)

h) sufficient additional education capacity, to be agreed with the Local Education Authority **and having regard to the Berinsfield Garden Village Regeneration Strategy**. This is likely to be the provision of one on site primary school and contributions to the enhancement of Abbey Woods Academy, as well as contributions to appropriate off site secondary school and Special Educational Needs and Disabilities (SEND) provision;

[PROPOSED MODIFICATION] Policy AS1, part 2(j)

j) delivery of leisure provision ~~in accordance with~~ **having regard to** the Infrastructure Delivery Plan **and having regard to the Berinsfield Garden Village Regeneration Strategy**, including delivery of a community hall, football playing pitches and sports hall;

[PROPOSED MODIFICATION] Policy AS1, part 2(k)

k) how all necessary transport infrastructure based on up-to-date evidence on the impact of the development will be delivered. This should reference the

> latest Infrastructure Delivery Plan **Berinsfield Garden Village Regeneration Strategy**, but not be limited to ~~this~~ **these** document**s**.

To provide additional clarity, we propose an additional modification to paragraph 8.13 of the supporting text as follows:

[PROPOSED MODIFICATION] Policy AS1 Paragraph 8.13

> 8.13 South Oxfordshire has undertaken a number of studies which indicate that Berinsfield requires investment and regeneration. The council will continue **to** work **with residents, the site promoter and relevant partners** to support Berinsfield and assist in exploring detailed solutions for the regeneration of Berinsfield in accordance with Policy AS1 (Land at Berinsfield Garden Village) and Policy AS13 (Berinsfield Garden Village). ~~This will identify the form that development should take in order to deliver the regeneration package identified.~~ **This work will inform the form that development should take and the regeneration package to be delivered. The Berinsfield Garden Village Regeneration Strategy provides greater definition of the regeneration package referenced in Policy AS1 by identifying regeneration priorities and opportunities across a number of thematic areas. Drawing on local evidence and community and stakeholder engagement, it explains the justification for those priorities and sets out the council's corporate position to inform the preparation and assessment of development proposals. It also identifies wider regeneration opportunities across the parish that may be progressed through other development, partnership projects and external funding. The Strategy does not introduce additional planning policy requirements or predetermine the specific package to be secured through the planning application process.**

These modifications would improve clarity by signposting readers to the Cabinet endorsed Regeneration Strategy, which provides greater definition of the regeneration package by identifying opportunities across a number of thematic areas, informed by collaborative working with partners and the needs of residents and the village. They would clarify the Regeneration Strategy's supporting role without introducing additional policy requirements or predetermining the package to be secured through the planning application process. These proposed modifications are also recorded in our response to question 7.2.15 for Berinsfield Garden Village, alongside other proposed modifications for Policy AS1 and its supporting text.

Finally, the Statement of Common Ground between the councils and the site promoter (examination library reference LPA49) records agreement that expansion of Berinsfield is acceptable only where it leads directly to delivery of the necessary regeneration package (paragraph 3.14) and that a sense of cohesion should be

delivered, including through improvements and expansion of existing facilities and services that bring benefits and regeneration to the existing village (paragraph 3.12).

We therefore consider that Policies AS1 and AS13, supported by the comprehensive masterplanning process, the Garden Village principles, the Draft Berinsfield Garden Village Regeneration Strategy and the Statement of Common Ground between the councils and the promoter, provide an effective framework to ensure that new development integrates with the existing settlement and contributes to the regeneration of Berinsfield.

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

Councils' Response:

Yes, we consider that Policy AS13 provides a clear and unambiguous basis for decision making when read alongside Policy AS1, the supporting text and the wider policies of the Joint Local Plan.

Policy AS13 has a clear purpose. It requires development at Berinsfield to accord with the Garden Village principles and provides a framework against which planning applications can be assessed. The policy does not operate in isolation. Rather, it complements Policy AS1, which allocates the site and sets out the detailed site-specific requirements, while Policy AS13 provides the overarching place-making, integration and regeneration principles that guide the development of the Garden Village.

The policy contains a series of clearly defined criteria against which planning applications can be assessed, including requirements relating to regeneration, place-making, connectivity, green infrastructure, community facilities and the integration of new and existing communities. These principles are sufficiently specific to guide the preparation and assessment of planning applications whilst remaining flexible enough to allow the detailed design of the development to evolve through the masterplanning and development management process.

The relationship between Policies AS1 and AS13 is particularly important. Policy AS1 part 2(b) requires proposals to demonstrate:

> "how the proposed development is designed to facilitate the regeneration of Berinsfield, including how it interacts and connects with the wider, existing village in accordance with the strategy for Policy AS13 (Berinsfield Garden Village)."

Policy AS13 then provides the framework against which those matters can be assessed. For example, criterion (d) requires a strong sense of place through a

connected Garden Village with attractive walking and cycling links between the existing village, new development and the surrounding countryside. This is complemented by Policy AS1 part 2(c), which requires development to demonstrate how walking and cycling permeability will be achieved between the existing and proposed settlement and beyond to key employment, retail and leisure destinations. Together, these provisions establish clear expectations regarding the physical integration of the allocation with the existing village.

The policy is also supported by a comprehensive masterplanning process. Policy LS1 requires large-scale major development to come forward through a comprehensive proposal and comprehensive masterplan informed by relevant technical studies. Policy AS1 applies this requirement to Berinsfield Garden Village and requires the masterplan to be prepared collaboratively with South Oxfordshire District Council and in consultation with Oxfordshire County Council. This provides a clear mechanism through which the Garden Village principles in Policy AS13 can be translated into a detailed and deliverable development framework. Pre-application engagement has already taken place between the site promoter, South Oxfordshire District Council and Oxfordshire County Council, including consideration of a detailed Masterplan Framework Document which has also been subject to public and stakeholder engagement, as referenced in the Statement of Common Ground (examination library reference LPA49, paragraph 2.12). This work demonstrates progress towards a comprehensive masterplanning of the site.

The supporting text further assists interpretation of the policy. Paragraph 8.12 states that the expansion of Berinsfield is considered acceptable only where it directly leads to the regeneration of the village, while paragraph 8.14 identifies the regeneration package that development is expected to support. These paragraphs provide additional context regarding the purpose of the allocation and the outcomes that the policy seeks to achieve.

As explained in our response to Q7.3.1, the Berinsfield Garden Village Regeneration Strategy (which will be submitted to the examination alongside this Matters statement) was endorsed by South Oxfordshire District Council's Cabinet on 8 October 2026 as the council's corporate regeneration framework and remains subject to further amendment and final approval and adoption. It supports implementation through local evidence, regeneration priorities and potential delivery approaches. The requirements against which proposals are assessed are established by the plan itself; the Strategy does not introduce additional policy requirements or determine the outcome of planning applications. Its supporting role therefore complements, rather than substitutes for, the decision-making framework provided by Policies AS1 and AS13.

Regulation 19 representations did not identify any substantive concerns regarding the clarity or effectiveness of Policy AS13 as a decision-making tool. As summarised in the councils' Response to Key Issues (examination library reference LPA48), the

principal issues raised related to matters such as flood risk, Local Green Space and biodiversity net gain requirements. One representation suggested that Policy AS13 should be combined with Policy AS1. However, we do not consider this necessary. The policies perform complementary but distinct functions, with Policy AS1 setting out the site-specific allocation requirements and Policy AS13 establishing the Garden Village principles that guide the development of the site.

The Statement of Common Ground between the councils and the promoter (examination library reference LPA49) provides further confidence that the policy is capable of implementation. The parties agree that development can be delivered in accordance with Policy AS13, that Berinsfield has the potential to become an exemplar Garden Village, and that a sense of cohesion should be delivered, including through the improvement and expansion of facilities and services that bring benefits and regeneration to the existing village (paragraphs 3.11-3.14).

We therefore consider that Policy AS13 read alongside Policy AS1 and the wider plan, provides a clear and unambiguous basis for decision-making. It establishes the principles and outcomes that proposals must address, while allowing detailed design and delivery arrangements to be resolved through comprehensive masterplanning and the planning application process. The Regeneration Strategy supports implementation of that framework without introducing additional planning policy requirements.

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?

Councils' Response:

Yes, the policy's requirements relating to Wick Farm Wellhouse are justified and effective.

Policy AS5 part 2(h) asks for the applicant to demonstrate a schedule of works as agreed with the council for the Grade II* Wick Farm Wellhouse's repair, agreed prior to the determination of an application for development.

The justification for this requirement is that it appears in part 2(vi) for the Wellhouse set out in the adopted South Oxfordshire Local Plan 2035's (examination library reference ALP01) Policy STRAT13: Land North of Bayswater Brook. This requirement has both proved its effectiveness and clarified to decision-takers how to

react to proposals coming forward in relation to this element of the site, as Land at Bayswater Brook has now received planning permission, including Listed Building consent for works to the Wick Farm Wellhouse:

- South Oxfordshire's Planning Committee resolved to grant outline planning consent (P22/S4618/O[25]) in November 2024;
- The Full Application (P22/S4596/FUL[26]) was approved on 9 December 2024;
- Listed Building consent (P22/S4550/LB[27]) was also given on 18 November 2025 for 'Refurbishment works to the Main Barn and three curtilage barns and refurbishment works to the Wick Farm Well House building'.

Page 37 of the Committee Report for application P22/S4618/O[28] explained that the Wellhouse is currently included on the Historic England Heritage at Risk register and has been assessed as being in a poor condition. The application proposals involved the repair and consolidation of the structure and bringing it into the public realm as a public art gallery.

A detailed schedule of works for the repair of the Wellhouse was required to be agreed as part of (rather than outside of) the listed building consent process. One mechanism used to agree the schedule of works for the Wellhouse, was receiving the council's Conservation Officer's confirmation that they were:

> "satisfied that the proposed schedule of works would serve to preserve the historic fabric in an appropriate manner and fulfil the requirements of Policy STRAT13:2vi. Details of future monitoring and maintenance of the Wellhouse will be secured through the S106".
> (Extract from the committee report for application P22/S4618/O).

Paragraph 7.137 of the outline application committee report (P22/S4618/O) also confirmed that the "on-going management and maintenance of the well house will be approved via a Community Facility Management Plan to be secured through the S106...part of this management plan can address any issue of potential condensation associated with the glass cover over the well raised by Historic

[25] Planning Application P22/S4618/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4618%2FO
[26] Planning Application P22/S4596/FUL, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4596%2FFUL
[27] Planning Application P22/S4550/LB, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4550%2FLB
[28] Planning Application P22/S4618/O, South Oxfordshire District Council: https://southoxfordshire.planning-register.co.uk/Planning/Display?applicationNumber=P22%2FS4618%2FO

England". The conditions in the Listed Building consent (P22/S4550/LB) set out a number of requirements (for example, submission of and approval by the LPA of details/drawings of the proposed glass well cover), which also are mechanisms that must be met before commencement of the approved listed building work can be carried out.

The receipt of planning permission and listed building consent at this site demonstrate that the requirements relating to Wick Farm Wellhouse have been justified and effective. It has been clear to a decision-taker how to react to proposals coming forward in relation to this element of the site, as the policy requirements were followed and carried through in the conditions and requirements for the works.

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?

Councils' Response:

Yes, Policy AS7's requirement for protection and enhancement of existing priority habitats is consistent with national policy and therefore justified. For context, there is an area (0.46% of the site allocation) of mapped Priority Habitat (Eutrophic Standing Waters) within the boundary of Land at Didcot Gateway and in light of this, Policy AS7 states that proposals for the development must demonstrate protection and enhancement of existing priority habitats (part 2(e)).

The justification for AS7's requirement is its consistency with paragraph 185(b) of the NPPF (examination library reference LNP01), which states that to 'protect and enhance biodiversity and geodiversity, plans should…promote the conservation, restoration and enhancement of priority habitats…'

This is also consistent with the Duty to Conserve and Enhance Biodiversity under s40 of the Natural Environment and Rural Communities (NERC) Act 2006, where criterion (3) of s40 states that action which may be taken by authorities (including local authorities) to further the general biodiversity objective includes 'action taken for the purpose of… b) conserving, restoring or otherwise enhancing a particular type of habitat'. The list of Priority Habitats is also published under s41 of the Act ('Section 41 habitats and species'). The Priority Habitat at Land at Didcot Gateway, of Eutrophic Standing Waters, features on this list.

The policy requirement therefore represents a justified approach to the Priority Habitat on site, which is consistent with the NPPF and NERC Act 2006. The requirement is also consistent with Policy NH1 (Biodiversity Designations) and Policy

NH2 (Nature Recovery), which protect the districts' most important habitats and species. Please note, it has recently come to light that the mapped waterbody of Eutrophic Standing Waters no longer exists at the site, as it appears to have been unlawfully infilled and is now subject to a live planning enforcement investigation. However, the basis of Policy NH2 (Nature Recovery), allows for the restoration of habitats and therefore the policy ambitions to restore priority habitats still apply for Policy AS7 (even though the habitat is not currently there).

Policy AS10/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?

Councils' Response:

Yes, the requirements of Policy AS10, along with the other policies of the plan, appropriately address the implication of the site's proximity to protected habitats sites and related designation. The policies provide a justified basis for the consideration of these matters.

Policy AS10 contains a series of criterion that address protected habitats sites and related designations, including:

2(j)(xviii), regarding the need for a project level Habitats Regulations Assessment to ensure that there is no adverse affect on Cothill Fen Special Area of Conservation (SAC), and any outcomes appropriately addressed.

2(n), regarding the need to avoid all direct and indirect impacts on the SAC and SSSIs.

2(o), regarding the provision of parkland that forms suitable alternative natural greenspace, as mitigation of recreational impacts

2(p), regarding that there are no adverse effects in relation to the water quality of nearby sites.

2(q-s), regarding the need for green infrastructure, buffers and defensive planting regarding the Sandford Brook and Dry Sandford Pit SSSI.

2(t), regarding the need to mitigate against any adverse effects on other priority habitat species.

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

We set out the following response to the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust representation, in the councils' Response to Key Issues (examination library reference LPA48, page 99) regarding the proximity of the allocation to the Cothill Fen SAC, nearby SSSIs and Local Wildlife Sites:

> "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 (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."

We consider this policy, along with the other policies in the plan, including Policy NH1 – Biodiversity designations, provide an appropriate basis for the 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)?

Councils' Response:

Given the Supplementary Planning Document (SPD) was formed on the basis of the allocation boundary, and the quantum of development and supporting infrastructure within Core Policy 8a of the Vale Local Plan Part 2, we consider it appropriate to acknowledge that the Joint Local Plan policies will take precedence over aspects of the SPD. We considered that the following modification to paragraph 8.107 would make the position clearer and improve the effectiveness of the plan regarding its relationship with the SPD:

[PROPOSED MODIFICATION] Policy AS14, Paragraph 8.107

> 8.107 Please note that policy requirements in this Joint Local Plan ~~may~~ supersede elements in the SPD**, particularly in respect of the site's boundary, scale of development and supporting infrastructure, and the indicative concept 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?

Councils' Response:

Yes, Policy AS14 provides a clear and unambiguous basis for decision-making, in so much as should development be proposed in the area outside of the AS10 allocation, it should meet the Garden City principles and accord with the Dalton Barracks Garden Village objectives listed in Policy AS14. Where this is not the case, the application should be refused.

However, the plan must be read as whole and the area outside of the site allocation remains in the Green Belt.

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?

Councils' Response:

Yes, the design requirements of Policy AS9 are justified by the site's location within a wider area of planned growth and the need to ensure that the site is comprehensively planned and integrated with surrounding development.

Part 2(a) requires the preparation of a comprehensive masterplan having regard to the Councils' Joint Design Guide (examination library reference DBE01), the indicative concept plan and the design and layout of nearby housing sites, including Valley Park (HOU2r) and Milton Heights (HOU2h) – both of which are under construction. Paragraph 8.69 of the supporting text further explains that a development masterplan is required to consider the future development of the whole site. The indicative concept plan (page 227) provides a strategic spatial framework for the allocation, illustrating key principles such as the broad distribution of development, the location of green infrastructure and green links, the local centre, and land safeguarded for transport infrastructure. The concept plan is intentionally indicative, providing strategic direction whilst allowing the detailed layout to evolve in response to technical evidence and site-specific considerations through the masterplanning process.

The policy also establishes clear design parameters for the site. The indicative concept plan illustrates a broad density gradient, reflected in part 2(e), which

requires development density to reduce from east to west. This approach reflects the site's relationship with the adjoining Valley Park development (and by extension, Didcot town), where higher densities are focused closest to existing and planned services, facilities and public transport connections, whilst lower densities provide a transition towards the site's more open western edge. Part 2(k) requires a coordinated landscape structure that builds upon existing landscape features and responds to the latest landscape evidence, whilst part 2(d) requires active travel connections to surrounding destinations, including Milton Heights via a new pedestrian / cycle bridge over the A34. Part 2(i) further requires public open space and recreational facilities to be accessible to both this site and the adjacent Valley Park development. Collectively, these requirements provide a clear framework for creating an integrated and well-connected development.

The relationship between the allocation and the adjacent Valley Park development was also considered through the Regulation 19 consultation process. As set out in the councils' Response to Key Issues (examination library reference LPA48, page 98), representations were received seeking the inclusion of a buffer between the two sites. We concluded that no modification to the policy or indicative concept plan was necessary, as the policy already contains requirements for coordinated masterplanning, landscape integration and connectivity with the adjoining Valley Park development. This demonstrates that the existing policy framework provides an appropriate basis for managing the interface between the allocation and surrounding development, including the adjacent Valley Park allocation.

We are therefore satisfied that the design requirements of Policy AS9 are justified and that the policy provides an effective framework for considering the relationship between the site and adjacent allocations.

Policy AS12 Harwell Campus

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

Councils' Response:

Yes, we consider that the masterplan requirements in Policy AS12 are justified and necessary to ensure the comprehensive and coordinated development of Harwell Campus.

Harwell Campus is a nationally and internationally significant centre for science, research and innovation, with Policy AS12 allocating approximately 93 hectares of employment land. The scale, complexity and long-term nature of development proposed at the Campus distinguish it from a conventional employment allocation and justify a comprehensive approach to planning and delivery.

The requirement for a masterplan is justified because many of the key issues associated with future growth can only be properly assessed at a campus-wide scale. This includes transport impacts, landscape effects, ecological impacts, archaeological and heritage considerations, infrastructure requirements and the cumulative effects of development. Without a masterplan there would be a risk that development could come forward in a piecemeal manner, making it more difficult to coordinate infrastructure provision, manage environmental impacts and ensure that individual proposals contribute towards the overall vision for the Campus.

The supporting text explains that the purpose of the masterplan is to ensure that development comes forward in a coordinated way, taking account of the impacts of growth across the whole campus, particularly in relation to transport and landscape matters, reflecting the site's location within the North Wessex Downs National Landscape (paragraph 8.90). The masterplan is therefore intended to provide a framework within which subsequent planning applications can be assessed consistently.

The requirement is also justified by the specific characteristics of the site. Policy AS12 requires a comprehensive assessment of transport impacts and a campus-wide travel plan. Part 3(c) requires traffic impacts to be modelled across the whole campus and requires the necessary infrastructure improvements and sustainable transport measures to be identified. Similarly, part 3(d) requires a comprehensive landscape plan for the whole campus, whilst part 3(g) requires all necessary infrastructure requirements to be addressed. These matters are inherently strategic and cannot be effectively planned on a plot-by-plot basis.

The masterplan also provides an important mechanism for coordinating future development with the ongoing operation and decommissioning activities associated with the Harwell Nuclear Licensed Site, as explained in paragraphs 8.91 and 8.92 of the supporting text.

Finally, the requirement is proportionate. As set out in part 2 of Policy AS12, the masterplan is intended to establish the principles and parameters for growth rather than determine the detailed design of individual development proposals.

In their Regulation 19 representation, the site promoter supported the inclusion of the policy, however they argued that there are already two masterplans for Harwell Campus, so there is no need for another masterplan. As we explained in the councils' Response to Key Issues (examination library reference LPA48, page 105), there are 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. This masterplan can be approved as part of a Local Development Order, providing a route to a streamlined consents process, as set out in the supporting text at 8.90. We have provided further

detail on the requirement of a masterplan for Harwell Campus in our response to questions 7.2.2, 7.2.9 and 7.2.11.

In summary, we consider that the requirement for a masterplan is justified by the scale, complexity and strategic importance of Harwell Campus and provides an effective mechanism for ensuring that future development comes forward in a coordinated and sustainable manner.

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?

Councils' Response:

Yes, we consider that the supporting text provides sufficient clarity regarding both the timing and scope of the consultation requirement.

In relation to timing, paragraph 8.92 states that developers should proactively consult with the Nuclear Decommissioning Authority (NDA) and Nuclear Restoration Services (NRS) for any development which abuts land within the nuclear licensed site.

In this context, "proactively" means that engagement should take place before a planning application is submitted, so that any relevant operational, safety, access or land-use considerations can be taken into account during the design and development of proposals.

It is also clear which developments the requirement relates to. Paragraph 8.92 of the supporting text explains that it applies to any development proposal that abuts land within the Harwell Nuclear Licensed Site. The extent of the Nuclear Licensed Site is identified in paragraph 8.91 and shown on the Policies Map (examination library reference CSD02). The consultation requirement is therefore based on the location of the proposed development relative to the Nuclear Licensed Site, rather than a particular type or scale of development.

This requirement complements Policy CE10. Part 10 of Policy CE10 establishes the circumstances in which development proposals must be referred to the Office for Nuclear Regulation (ONR) either within the Nuclear Licensed Site or, in specified circumstances, within the Outer Consultation Zone. Additionally, paragraph 8.92 of the supporting text to Policy AS12 seeks to ensure early engagement between developers and the NDA and NRS where development proposals adjoin land within the Nuclear Licensed Site. The two provisions therefore perform different functions: Policy CE10 establishes when referral to ONR is required, whereas paragraph 8.92 promotes early engagement with the organisations responsible for management and

decommissioning of the site. Together, they help to ensure that relevant nuclear-related considerations are properly addressed.

We therefore consider that the policy and supporting text provide sufficient clarity regarding both when consultation should occur and the developments to which the requirement applies.

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?

Councils' Response:

Yes, we consider that Policy AS12 and its supporting text provide a clear and effective framework for the consideration of proposals relating to nuclear decommissioning and restoration activities at Harwell.

Whilst Policy AS12 allocates Harwell Campus for approximately 93 hectares of employment development, part 3(f) explicitly recognises the ongoing role of the Harwell Nuclear Licensed Site (NLS) and requires proposals to ensure the management of radioactive waste and decommissioning processes at the Harwell Nuclear Licensed Site, in line with national strategies and policies.

This provides a clear policy hook for the continued operation of decommissioning and waste-management activities and ensures that they are taken into account when planning for the future development of the Campus.

The supporting text provides further clarity. Paragraph 8.91 explains that the Nuclear Licensed Site currently comprises approximately 84 hectares of land and that ongoing activities include the decommissioning and demolition of redundant facilities, the transfer of nuclear materials and waste, and associated regulatory processes. The paragraph also makes clear that the Nuclear Decommissioning Authority (NDA) or Nuclear Restoration Services (NRS) may need to submit planning applications for facilities required to support decommissioning and waste-management operations, and that the allocation of employment use should not prohibit applications for the management of radioactive waste and decommissioning processes at the Harwell NLS whilst it forms part of Harwell NLS and under the control of the NDA or NRS.

This is an important clarification because it makes clear that the employment allocation is not intended to prejudice the ongoing management, restoration or decommissioning of the Nuclear Licensed Site.

Paragraph 8.92 further strengthens this approach by directing developers to proactively engage with the NDA and NRS where development proposals abut land within the Nuclear Licensed Site. This helps ensure that development proposals

appropriately take account of operational requirements and future decommissioning activities.

The policy should also be read alongside Policy CE10, which establishes the circumstances in which development proposals must be referred to the Office for Nuclear Regulation (ONR), either within the Nuclear Licensed Site or, in specified circumstances, within the Outer Consultation Zone. Together, Policies AS12 and CE10 provide a clear and complementary framework through which employment growth, nuclear decommissioning and site restoration activities can be managed in a coordinated manner.

We therefore consider that Policy AS12 and its supporting text provide a clear and effective basis for the consideration of developments relating to nuclear decommissioning and restoration. The policy positively supports the continued operation of Harwell Campus as a strategic employment location whilst ensuring that the requirements of the Nuclear Licensed Site are fully recognised and accommodated.

Policy AS15 Harcourt Hill Campus

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

Councils' Response:

Yes, we consider that the requirement for the preparation of a masterplan is justified and necessary to ensure that any significant change at Harcourt Hill Campus is planned and delivered in a coordinated manner.

Harcourt Hill Campus is an established educational campus which occupies a particularly sensitive location within the Oxford Green Belt and on the urban-rural fringe. As explained in supporting text paragraphs 8.109 and 8.110, the site lies within the setting of important views both towards Oxford and from Oxford into the surrounding countryside. The University is also reviewing the future role of the campus. In these circumstances, it is appropriate that any significant change is guided by an agreed masterplan that considers the site as a whole rather than through a series of unrelated development proposals.

The masterplan requirement is justified because many of the issues associated with future development can only be effectively considered at a campus-wide scale. These include the provision and retention of educational and sports facilities, the integration of development into the landscape, the protection of strategic views, transport and movement patterns, public transport provision, walking and cycling connectivity, and the relationship of development with the Oxford Sewage Treatment Works. A masterplan provides a mechanism for ensuring that these interrelated

issues are addressed comprehensively and that individual proposals contribute towards a coherent vision for the future of the campus.

In relation to sporting and leisure provision, the masterplan should be informed by the findings and recommendations of the adopted Leisure Facilities Assessment and Strategy (examination library reference HPL04.4) and Playing Pitch Strategy (examination library reference HPL06.2) to ensure that existing facilities are appropriately retained, enhanced or reconfigured and that future provision continues to meet identified needs. Please see our proposed Main Modification MM13 that adds this direction to supporting text paragraph 8.110.

The requirement is also proportionate. Policy AS15 only requires a masterplan where significant change is proposed and does not prevent routine management, maintenance or small-scale development from coming forward. Furthermore, the policy does not prescribe the detailed content of future proposals. Instead, it requires a masterplan to establish the principles and parameters against which future planning applications can be assessed.

The policy and supporting text make clear why a masterplan is needed. Paragraph 8.110 explains that the purpose of the masterplan is to ensure that development comes forward in a coordinated way, taking into account the site-specific matters identified in the policy and respecting the site's Green Belt setting and urban-rural fringe context. The masterplan therefore provides an important tool for balancing the future needs of the campus with the environmental sensitivities of its location.

Westminster College Education Trust, who represent the interests of the Methodist Church as owner of Harcourt Hill Campus, support the proposed approach to ensuring any future development at Harcourt Hill Campus is delivered comprehensively and according to an agreed masterplan, as set out in the Statement of Common Ground (examination library reference LPA60A, paragraph 4.1).

We therefore consider that the masterplan requirement is justified by the scale, complexity and sensitivity of the site and provides an effective mechanism for ensuring that any significant future change is planned comprehensively and sustainably.

Appendices

Appendix 1: Viability Introduction to Mix of Uses and Market Conditions for Relevant Site Allocations

This appendix provides the background to the mix of uses and market conditions regarding specific site allocations, in relation to **Question 7.2.10 - Is the development proposed, including the mix of uses on the site, viable and deliverable over the plan period?**

Mix of Uses

The Joint Local Plan Viability Report (examination library reference ITV04) and its Appendices (examination library reference ITV04.1) produced by viability consultants AspinallVerdi have assessed the plan's policy requirements and the mix of uses for all sites (examination library reference ITV04, page 103), in line with the PPG requirements for undertaking such an assessment.

The schemes have been tested by reference to the form and mix of development shown in the masterplans put forward by site promoters, and with reference to the requirements listed in the relevant policies. For example, the appraisals include the costs associated with delivering the schools and wider social infrastructure required by policy, so that these obligations are reflected within the assessment of residential development viability. The housing mix for market and affordable housing follows the requirements of Policy HOU4.

Local centres and employment land are not modelled as directly developed components of the schemes. Instead, it is assumed that these areas would be parcelled and sold to specialist developers or occupiers. This follows a widely accepted approach in strategic site and local plan viability assessment, where non-residential land is often treated as cost/value neutral.

Market Conditions

The Joint Local Plan Viability Report (examination library reference ITV04) was produced in September 2024. The value assumptions (page 55) and Benchmark Land Values (page 61) were evidenced by research papers produced by AspinallVerdi (appended to the Report) and construction costs (page 57) were based on BCIS construction costs, as promoted by Government's Planning Practice Guidance (PPG) on viability. The costs and treatment of the site allocations relied on significant engagement with site promoters and detailed review of the infrastructure costs adopted for each site, also taking into account the delivery mechanism and landowner positions (page 97). This allowed for a robust assessment of viability at that time, aimed at ensuring a deliverable plan.

Appendix 1: Viability Introduction to Mix of Uses and Market Conditions for Relevant Site Allocations

It is acknowledged that, for many and varied reasons, markets have faced volatility since the assessment. Indeed, current market conditions are recognised in the Matthew Pennycook letter to the Planning Inspectorate on 15 July 2026 (examination library reference ID26), which states:

> "While deliverability and viability must remain important considerations in plan making, substantial economic volatility can generate uncertainty which may not reflect the longer-term prospects for delivery over the life of plan. With the benefits of up-to-date local plans firmly in mind, it is important that local plan deliverability and viability challenges be considered in a broad context, especially delivery over the life of plan. With the benefits of up-to-date local plans firmly in mind, it is important that local plan deliverability and viability challenges be considered in a broad context, especially when economic conditions are volatile and are causing fluctuations to market conditions and heightening development risk and associated costs. As such, allocations should generally be assessed against their prospects of delivery over the plan period as a whole, rather than solely against current market conditions.
>
> For these reasons, where a robust evidence base exists, and there is a reasonable basis for concluding that allocations are capable of delivery over the plan period as a whole, I expect concerns regarding deliverability and viability to be approached pragmatically."

To ensure that the viability exercise took account of market fluctuations, and in line with best practice, sensitivity testing was undertaken by AspinallVerdi (examination library reference ITV04, page 45). This showed the potential impact of increasing costs and values, demonstrating how this could influence overall viability. For each site, and in light of the Minister's comments and current market conditions, we therefore use the tables in Q7.2.10 to show how the allocations could be considered viable and deliverable over the plan period.

We also address relevant representations made in relation to each site.

(Please note that to illustrate the points made, AspinallVerdi have produced a new sensitivity table for each of the strategic sites. The base appraisal modelling assumptions and conclusions remain as they were presented in the original viability report with no update to the base viability position – this table only interprets the original work in a new way and demonstrates the impact of changing costs and values on the viability in a single table.

Appendix 1: Viability Introduction to Mix of Uses and Market Conditions for Relevant Site Allocations

In the original Viability Report, the sensitivity tables compared the percentage of affordable housing with other appraisal inputs such as Benchmark Land Value, grant funding and profit requirements, for example, showing how changes to those inputs could influence the viability of different levels of affordable housing. In light of the fact that much recent discussion centres on how build costs and sales values may change over time, the new sensitivity table provides a way of viewing how changing costs and values could influence the viability of the plan policies. The base build costs and the base market values (i.e. the 100% figures) have not been updated from the figures used in the earlier modelling but we have now presented the interaction of these two variables against each other so as to test the sensitivity of the viability outcomes to different percentage changes in these two variables. Given that it is widely acknowledged that we are currently experiencing significant market volatility, interpreting the previous assessment data in this way allows us to take a longer-term view on the viability).

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