South Oxfordshire and Vale of White Horse
Joint Local Plan 2041

LPA108

Note on Local Information Requirements

Introduction

This note responds to ID28, the Inspectors' Post Stage 2 Hearings Letter (examination library reference ID28), specifically paragraph 19 regarding local information requirements:

> "19. Several of the policies require assessments or other information to be submitted with planning applications. We invite the Councils to review where this is the case and to set out in a brief note the justification for the requirements in the context of paragraph 44 of the Framework. The note should also reflect on whether documentation already required as part of applications, such as design and access statements, could include the information required by the policies without giving rise to the need for additional material to be submitted."

Paragraph 44 of the NPPF (examination library reference LNP01) states that local planning authorities should publish a list of their information requirements for applications for planning permission, keep the requirements to a minimum and should only request supporting information that is relevant, necessary and material to the application in question.

The Councils' consider that there is substantial overlap between the NPPF's tests of information that is 'relevant' and information that is 'material to the application'. We have treated these two tests as a composite test of relevance or materiality. We consider that the test of 'necessary' should be understood to relate to information that is 'necessary' to determine whether a development proposal is 'acceptable in planning terms', and that this, in turn, requires consideration of the applicable policy framework and any other material considerations. We remain satisfied that the JLP policies which require applicants to submit supporting information are in accordance with these tests in paragraph 44 of the NPPF.

The Councils' have reviewed all JLP policies that require applicants to provide information, assessments or supporting evidence as part of the planning application process. Many policy requirements can be addressed through documents already commonly submitted with planning applications, including Design and Access Statements, Planning Statements and other supporting material. In other cases,

specialist technical evidence is required and is more appropriately provided through standalone reports.

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For the purpose of this review, policies have been grouped into three broad categories:

- **Category A**: Information that can normally be incorporated within existing application documents.
- **Category B**: Technical assessments already commonly required through national policy, legislation, technical guidance or local validation requirements.
- **Category C**: Bespoke evidence required to assess specific policy tests.

The Councils' have also reviewed the strategic allocation policies (AS1-AS16). Where those policies identify supporting information requirements, these generally comprise either: information that would ordinarily be provided through masterplans, planning statements, design documents or other application material; or established technical assessments already commonly required through legislation, national policy, technical guidance or local validation requirements. These requirements have therefore been captured within Categories A and B below, rather than being treated as separate categories of information requirement.

Information requirements do not apply universally to all planning applications. In many cases, information is only required where a particular issue arises or where a proposal falls within the scope of a specific policy. The JLP therefore applies information requirements proportionately according to the nature, scale and location of development.

Category A: Policies requiring information that can normally be incorporated within existing application documents

The following JLP policies generally require information that can be incorporated within documents that applicants would already be expected to prepare to explain and justify development proposals.

In most cases, applicants could provide the relevant information through Design and Access Statements, Planning Statements, Green Infrastructure Statements, Landscape Strategies or similar supporting material prepared as part of the normal application process. These policies (presented in plan order) do not generally require standalone technical assessments beyond documentation that would ordinarily accompany a planning application:

- CE11 – Light Pollution and Dark Skies
- DE1 – High Quality Design
- DE3 – Delivering Well-Designed New Development
- JT4 – Community Employment Plans
- HP6 – Green Infrastructure
- HP7 – Open Space
- HP8 – Provision for Children's Play and Spaces for Young People
- HP10 – Watercourses

In most cases, applicants could provide the relevant information through:

- Design and Access Statements
- Planning Statements
- Green Infrastructure Statements
- Landscape Strategies
- or similar supporting material prepared as part of the normal application process.

Category B: Policies relying on technical assessments already commonly required by national policy, legislation or local validation requirements

The following JLP policies rely on specialist technical assessments that are already commonly used within the planning system and are generally required through national policy, legislation, technical guidance or local validation requirements, rather than introducing new local requirements:

- CE1 – Sustainable Design and Construction
- CE6 – Flood Risk
- CE8 – Water Quality, Wastewater Infrastructure and Drainage
- CE9 – Air Quality
- CE12 – Soils and Contaminated Land
- LS1 – Proposals for Large Scale Major Development
- NH1 – Biodiversity designations
- NH2 – Nature recovery
- NH8 – The Historic Environment
- NH11 – Archaeology and Scheduled Monuments
- IN2 – Sustainable Transport and Accessibility
- IN3 – Transport Infrastructure and Safeguarding
- IN6 – Deliveries and Freight
- IN7 – SESRO Safeguarding
- Appendix 5 – Carried Forward Allocations

Examples of specialist technical assessments these would be addressed in include:

- Flood Risk Assessments
- Drainage Strategies
- Air Quality Assessments
- Contamination Assessments
- Heritage Statements
- Archaeological Assessments
- Transport Assessments
- Transport Statements
- Ecological Assessments
- Habitats Regulations Assessment (HRA)
- Nutrient Neutrality assessments
- Biodiversity Gain Plans / biodiversity metric information
- Landscape and Visual Impact Assessments
- Noise and Odour Assessments

Category C: Policies requiring bespoke evidence because they contain specific policy tests that cannot reasonably be assessed without additional supporting information

The following policies contain specific tests that cannot reasonably be assessed without supporting evidence. In some cases, these involve providing opportunities for developers to set out why they qualify for a particular policy e.g. that a proposal for community-led housing is from a suitable community organisation. Or it is for applicants to demonstrate that they qualify for an exemption set out in the policy e.g. for business premises or community uses proposed for loss, that they have been marketed and are not viable.

CE2 – Net Zero Carbon Buildings

- CE3 – Reducing Embodied Carbon
- CE4 – Sustainable Retrofitting
- CE7 – Water Efficiency
- HOU3 – Affordable Housing
- HOU6 – Self-Build and Custom-Build Housing
- HOU7 – Affordable Self and Custom-Build Housing
- HOU12 – Rural and First Homes Exception Sites
- HOU13 – Community-Led Housing Development
- HOU14 – Build to Rent Proposals
- JT2 – Protecting Our Employment Sites
- JT7 – Overnight Visitor Accommodation
- TCR2 – Strategy for Town and Local Service Centres
- TCR4 – Retail and Service Provision in Villages and Local Centres
- HP1 – Healthy Place Shaping
- HP2 – Community Facilities and Services
- HP3 – Health Care Provision
- HP4 – Existing Open Space, Sport and Recreation Facilities

Examples include:

- Energy statement, water efficiency calculations
- Whole Life Carbon Assessment
- Marketing evidence
- Viability evidence/evidence of operation no longer being reasonable/viable
- Local needs evidence
- Community-led housing evidence
- Evidence supporting alternative forms of provision

Conclusions

The Councils' have reviewed all JLP policies that require supporting information and considered those requirements against paragraph 44 of the Framework (examination library reference LNP01).

The review demonstrates that most policy requirements either:

- can be addressed through information ordinarily submitted as part of a planning application; or
- rely on established technical assessments already commonly required through national policy, legislation, technical guidance or local validation requirements.

Only a limited number of policies require bespoke supporting evidence. In each case, the evidence is necessary to assess a specific policy test, such as demonstrating viability, establishing local need, evidencing marketing activity, community-led delivery, or justifying the loss of a protected use, facility or service.

The Councils' also reviewed the strategic allocation policies and are satisfied that any supporting information requirements arising from those policies are already captured through the categories identified in this note.

Information requirements are applied selectively and only where relevant to the development proposed. The JLP therefore adopts a proportionate approach to supporting information requirements, seeking only the information relevant, necessary and material to assess development proposals and inform decision-making, consistent with paragraph 44 of the Framework.

Appendix - Policy Categorisation and Rationale

Category A: Policies requiring information that can normally be incorporated within existing application documents

Policy	Reason for Classification
CE11 Light Pollution and Dark Skies	Lighting design Lighting strategies can normally be incorporated within design documentation and site plans. The policy wording requires information that is ‘proportionate to the scale of the development’ and therefore doesn't routinely require a specialist standalone lighting assessment, although additional supporting information may be required where necessary to assess the impacts of more complex proposals. Such information can accompany design documentation.
DE1 High Quality Design	Constraints and Opportunities Plan The policy requires applicants to explain how the proposal responds to site constraints and opportunities. This information is typically illustrated through plans and supporting design material and can normally be incorporated within a Design and Access Statement or other design documentation submitted as part of a planning application. This is required in adopted policy for SOLP DES3 regarding what is included in a Design and Access Statement. The policy does not generally require a separate standalone assessment.
DE2 Local Character and Identity	Contextual analysis This policy requires applicants to provide a contextual analysis demonstrating how the design has responded positively to the site and its surroundings and reinforces local character and identity. This information can normally be incorporated within a Design and Access Statement. The policy does not create a separate standalone information requirement and reflects an existing requirement of adopted SOLP Policy DES3.

DE3 Delivering Well-Designed New Development	Masterplan, Design Code & Design and Access Statement The policy requires masterplanning and design coding information depending on the scale of development. These are established design tools and processes used to support the delivery of high-quality design. Some requirements, such as Design and Access Statements, are already required through legislation. The policy applies these requirements proportionately and does not require all design tools for every proposal. Depending on the scale and complexity of development, this information may be included within a Design and Access Statement or provided through associated design documentation for larger scale or more complex schemes. The policy does not necessarily create a separate information requirement and is a continuation of how adopted policies are implemented.
JT4 Community Employment Plans	Community Employment Plan (Only applies to major non-residential schemes over 1,000 sqm & residential schemes of over 500 homes) Typically addressed through Economic Statements rather than specialist standalone assessments and is already an active requirement in Vale adopted policy, and within the Vale validation checklist.
HP6 Green Infrastructure	Green infrastructure statement (major applications only) Policy HP6 explains that the Green Infrastructure Statements can be part of the Design and Access Statement.
HP7 Open Space	Green infrastructure statement (major applications only) Policy HP7 explains that Green infrastructure statements can be part of the Design and Access Statement.
HP8 Provision for Children's Play and Spaces for Young People	Assessment of existing play facilities (major applications only) This information showing awareness of surrounding play park equipment can be explained in an applications planning statement and shown on layout plans.
HP10 Watercourses	Detailed plans of watercourse buffer & Construction Management Plan (only for major development within 20m of a watercourse) Information typically forms part of planning statements, site layouts, drainage strategies and design proposals.

Category B: Policies relying on technical assessments already commonly required by national policy, legislation or local validation requirements

Policy	Reason for Classification
CE1 Sustainable Design and Construction	Overheating assessments (residential & non-residential); Sustainable Design and Construction Checklist The policy relies upon a recognised technical assessment methodology (CIBSE TM59/TM52) to demonstrate compliance with the policy. These are well-established methodologies used across the development industry to assess overheating risk, including TM59 which is commonly used to demonstrate compliance with the requirements of Building Regulations Part O for residential development. Compliance with the wider requirements of Policy CE1 is demonstrated through the Sustainable Design and Construction Checklist, which is an established requirement within South Oxfordshire and provides a familiar and proportionate mechanism for applicants to demonstrate compliance with the policy.
CE6 Flood Risk	Flood Risk Assessment (FRA) The policy relies on site-specific Flood Risk Assessments where required by national policy and guidance, including development in Flood Zones 2 and 3 and certain development in Flood Zone 1. Flood Risk Assessments are established technical assessments recognised by national policy and are already included within local validation requirements. The policy reflects the approach set out in national policy regarding the Sequential Test, Exception Test and flood risk assessment requirements rather than creating a unique local information requirement. The information required is proportionate to flood risk and necessary to assess the safety of development, impacts of climate change and effects on flooding elsewhere.
CE8 Water Quality, Wastewater Infrastructure and Drainage	Water Quality Evidence, Sewage Capacity Assessment (only major development) & Drainage Strategy Drainage strategies/reports are established validation requirements which typically contain sewage capacity information and drainage information. Water quality evidence is needed for development with an adverse impact on water quality, but this would commonly arise where development has the potential to affect water quality. This typically involves specialist assessments of potential impacts and mitigation measures and reflects matters

	that would ordinarily require engagement with statutory consultees and technical assessment as part of the planning process. The policy does not prescribe a unique local methodology but relies on established technical assessment approaches. This policies asks may be reiterated in specific 'AS' policies where a particular piece of information is needed e.g. related to specific STW that relates to the site and mitigation is needed.
CE9 Air Quality	Air Quality Assessment, Dust Assessment Air Quality Assessments and Dust Assessments are routinely required for development proposals where there is the potential for significant air quality impacts during construction or operation. They provide the technical evidence necessary to identify likely effects on human health, amenity and the environment, and to determine whether mitigation is required. Such assessments are already established components of the planning application process and are included within the Councils' validation requirements where relevant. Policy CE9 therefore relies on recognised technical evidence rather than creating a new local information requirement.
CE12 Soils and Contaminated Land	Soil Handling Plan, Sustainable Soil Management Strategy, Phase 1 Contaminated Land Preliminary Risk Assessment, and Contaminated Land Questionnaire The policy relies on established land quality and contamination assessments that are already commonly required where development may affect human health, controlled waters or the wider environment. Phase 1 Contaminated Land Preliminary Risk Assessments and associated remediation strategies follow established industry and regulatory practice and are already reflected in local validation requirements. The policy also requires soil handling plans and sustainable soil management strategies on best and most versatile agricultural land, providing evidence that soil resources will be appropriately protected, managed and reused during development. These requirements enable the Council to assess risks arising from contamination and the loss or degradation of valuable soils and do not introduce a unique local assessment methodology.
LS1 Proposals for Large Scale Major Development	The policy has lists of requirements for large-scale proposals LS1 primarily draws together in a single policy the technical assessments that would ordinarily be expected to support large-scale major development proposals. The policy does not create a wholly new suite of local information requirements but identifies the information likely to be required, depending on the characteristics and

	location of the site, to enable comprehensive assessment of major development proposals. The policy expressly states that requirements depend on the characteristics and location of the site and therefore not all listed studies will be required in every case. Most of the listed documents are conventional major development assessments. Some listed documents are required to demonstrate compliance with specific Joint Local Plan policies (for example Whole Life Carbon Assessments, Energy Statements and Health Impact Assessments). However, the majority of the evidence requirements reflect established assessment processes for strategic-scale development. LS1 and a number of strategic allocation policies require comprehensive masterplans for large-scale developments. Such masterplans are proportionate to the scale and complexity of the development proposed and are necessary to assess infrastructure delivery, transport, landscape, environmental and design matters in an integrated manner.
NH1 Biodiversity Designations	Ecological assessments Development affecting designated sites, protected habitats or species, irreplaceable habitats, or ecological networks commonly requires ecological surveys, protected species surveys, Habitats Regulations Assessment information, nutrient neutrality evidence (in areas affected), or other ecological evidence. Hydrological catchment evidence is more bespoke but again it is not unusual to be mapped as part of HRA related to areas with lowland fen. These assessments are already established through legislation, national policy, statutory guidance and the operation of the Habitats Regulations, rather than introducing new local information requirements.
NH2 – Nature Recovery	Ecological evidence and biodiversity assessment information related to 'AS policies' The policy doesn't specifically set a requirement for submitted information, however it is the policy to which the plan's 'AS' policy allocations refer when they ask for draft biodiversity gain plans. The biodiversity information is already commonly required through national legislation and guidance relating to biodiversity net gain and ecological assessment. This includes biodiversity metric calculations, habitat assessments and information necessary to demonstrate the effects of development on ecological networks and the delivery of biodiversity net gain. These are established assessment requirements within the planning system rather than additional local validation requirements.

NH8 The Historic Environment	Heritage Statements The policy relies on Heritage Assessments, Heritage Statements, Statements of Significance and, where appropriate, supporting surveys and fieldwork. These are established heritage planning assessments used to identify the significance of heritage assets and assess the effects of development upon them. The policy reflects existing national policy and best practice requirements rather than introducing a unique local information requirement. The policy relies on established heritage assessment processes already widely used within the planning system. They are included in the validation checklist. The information required is proportionate to the importance of the heritage asset affected and is necessary to understand significance and assess the impacts of development proposals. The policy therefore reflects existing national planning practice rather than creating a new local information requirement.
NH11 Archaeology and Scheduled Monuments	Archaeological assessments The policy relies on established archaeological assessment and evaluation processes, including consultation of the Historic Environment Record, archaeological desk-based assessments, field evaluations, written schemes of investigation and archaeological recording where appropriate. These are recognised heritage assessment processes already commonly used within the planning system and are necessary to understand archaeological significance and assess the impacts of development proposals. They form part of the validation checklist. Information requirements are applied proportionately according to the likelihood that archaeological remains may be affected and are necessary to understand significance and inform decision-making. The policy therefore reflects existing assessment requirements rather than creating a new local information requirement.
IN2 Sustainable Transport and Accessibility	Travel Plan, Transport Assessment / Statement The policy relies on established transport planning documents including Transport Statements, Transport Assessments and Travel Plans. These are recognised technical assessments already commonly required for development proposals in accordance with national guidance and highway authority requirements. They are included in the validation checklist. The policy primarily signposts applicants to established assessment processes and methodologies rather than creating a new local information requirement. The information

	requirements are proportionate and reflect established transport assessment processes already used throughout the planning system. The policy applies existing thresholds and guidance to ensure that development proposals appropriately assess transport impacts and opportunities for walking, cycling, wheeling and public transport.
IN3 Transport Infrastructure and Safeguarding	Options appraisal study, EIA, Archaeological assessment and flood risk assessment (only for safeguarded schemes) The policy relies on established technical assessment processes where transport infrastructure schemes are proposed, including environmental assessments, flood risk assessments, archaeological assessments and, where appropriate, alternative options studies. These are recognised assessment tools commonly applied to major infrastructure projects and do not represent unique local information requirements created by the Plan. These can be included within planning statements and other assessments currently on the validation checklist. Technical assessments are only expected where transport infrastructure schemes are being brought forward and where such assessments are necessary to understand environmental, archaeological or flood risk impacts. The policy therefore relies on existing assessment mechanisms already established in national policy and legislation.
IN6 Deliveries and Freight	Swept path analysis; Transport Assessments and Travel Plans document; Construction Traffic Management Plan and Delivery and Servicing Management Plan The policy relies on established transport and logistics assessments, including swept path analysis, Transport Assessments, Construction Traffic Management Plans and Delivery and Servicing Management Plans. These are recognised technical assessments commonly required for development proposals with significant servicing, freight or traffic implications and reflect existing highways and transport planning practice rather than creating unique local information requirements. This can be included within planning application documentation on the validation checklist. The information requirements only apply where development is expected to generate significant freight, servicing or construction traffic impacts. The policy relies on established transport planning assessments and management plans already commonly used by highway authorities to assess and mitigate

	impacts on the transport network, highway safety and sensitive receptors. The requirements are therefore proportionate and based on recognised assessment practices.
IN7 SESRO Safeguarding	Technical assessments associated with NSIP/DCO process The assessments referenced in Policy IN7 are largely required because of the scale and nature of the proposed Nationally Significant Infrastructure Project and would be expected through the Development Consent Order process. The policy references a range of established technical assessments and supporting documents that would ordinarily form part of the Development Consent Order process, including environmental, archaeological, heritage, transport and flood risk assessments. The policy largely relies on recognised assessment processes and evidence requirements that arise through national infrastructure planning and related technical guidance rather than creating a bespoke local information requirement.
Appendix 5 Site Allocations	The majority of information requirements within the carried-forward allocation policies relate to established technical assessments including transport assessments, flood risk assessments, contamination investigations, heritage assessments, archaeological assessments, ecological surveys and landscape assessments. These are already addressed through the relevant thematic policies in the Plan and are not considered to create additional local information requirements. Some strategic allocations require comprehensive masterplans and phasing strategies, reflecting the scale and complexity of the development proposed.

Category C: Policies requiring bespoke evidence because they contain specific policy tests that cannot reasonably be assessed without additional supporting information

Policy	Reason for Classification
CE2 Net Zero Carbon Buildings	Energy statement CE2 relies on a specialist energy statement setting out the design stage space heating demand and EUI calculations, the proposed heating and energy generation systems, the predicted renewable energy generation, any reliance on technical feasibility or offsetting provisions and the details of the proposed assured performance assessment method. Whilst the policy introduces locally-specific performance standards, the mechanism for demonstrating compliance is through established technical assessment processes already familiar within the development industry. Energy Statements are currently required to satisfy the requirements of adopted SOLP Policy DES10, and guidance on these is available on our website *Advice Note on Policy DES10: Carbon Reduction - South Oxfordshire District Council*
CE3 Reducing Embodied Carbon	Pre-demolition Audit (only for Major Developments) & Whole Life Carbon Assessment Requires a pre-demolition audit and a Whole Life Carbon Assessment undertaken in accordance with the recognised RICS industry methodology (referenced in the policy). Compliance relies on specialist technical evidence and established whole life carbon methodologies for quantifying embodied carbon emissions. Whilst the policy introduces locally specific requirements relating to embodied carbon, it relies on recognised assessment processes which are increasingly used across the development industry. Pre-demolition audits are proportionate as only required for major developments and are an industry recognised mechanism for identifying opportunities for the re-use and recycling of materials arising from demolition.
CE4 Sustainable Retrofitting	Pre-redevelopment Audit (only for Major Developments) The policy requires a pre-redevelopment audit using a recognised methodology to identify opportunities for retaining and retrofitting existing buildings, structures and materials. This is a bespoke assessment required to demonstrate compliance with the specific policy requirements and would not ordinarily be submitted as part of a

	planning application in the absence of the policy. The methodology is well established industry practice, which is listed within the policy as suggested methodologies.
CE7 Water Efficiency	Water efficiency evidence / calculations The policy requires applicants to demonstrate that development has been designed to minimise water consumption and, for residential development, to achieve a specified water efficiency standard. Compliance is likely to require supporting evidence and water efficiency calculations demonstrating how the required standard will be achieved. Whilst based on recognised industry methodologies and standards, this information is required specifically to demonstrate compliance with the policy and would not ordinarily be required for all planning applications in the absence of the policy.
HOU3 Affordable Housing	Open Book Viability Assessment The policy only requires additional supporting information in specific circumstances where an applicant seeks to provide affordable housing below policy requirements or justify off-site provision. In these cases, applicants must provide an open-book viability assessment or other robust evidence to demonstrate why policy-compliant provision cannot be achieved. This information is necessary to assess the specific policy tests and would not ordinarily form part of a standard planning application.
HOU6 Self-Build and Custom-Build Housing	Marketing Strategy The policy requires bespoke evidence where applicants seek to demonstrate compliance with self-build and custom-build delivery requirements, including marketing strategies and evidence that serviced plots or shell homes have been appropriately marketed before alternative development is permitted. These requirements are necessary to assess the specific policy tests and would not ordinarily form part of standard planning application documentation. The policy does not require all housing developments to submit additional information. The marketing evidence requirements only apply in specific circumstances where applicants seek flexibility from the self-build and custom-build plot requirements. The information is therefore proportionate and necessary to assess compliance with the policy.

HOU7 Affordable Self and Custom-Build Housing	Marketing Strategy The policy requires bespoke evidence demonstrating compliance with affordable self and custom-build housing requirements, including marketing strategies, evidence of marketing undertaken to eligible households and relevant groups, and evidence that plots remain unsold before open market disposal is permitted. This information is necessary to assess the specific policy tests and would not ordinarily form part of a standard planning application documentation. The marketing evidence requirements only arise where applicants seek to demonstrate that affordable self and custom-build plots have been properly marketed and remain undelivered. The information is therefore proportionate and directly related to the operation of the policy rather than a general requirement applying to all residential development proposals.
HOU12 Rural and First Homes Exception Sites	Housing Needs Assessment (Rural/First Homes Exception Sites) The policy requires bespoke evidence, including a robust housing needs assessment and supporting housing needs survey, to demonstrate a clearly established local need for affordable housing. Where market housing is proposed to support delivery, viability evidence may also be required. This information is necessary to assess the specific policy tests relating to local need, scale of development, affordability and viability, and would not ordinarily form part of standard planning application documentation. The information requirements are proportionate because Rural and First Homes Exception Sites are supported as exceptions to the normal development strategy. Evidence of local housing need and, where relevant, viability is necessary to justify why development should be permitted in these locations and to ensure the resulting housing responds directly to identified local needs.
HOU13 Community-Led Housing Development	Management Plan - Community-led housing evidence The policy requires bespoke evidence demonstrating that development is genuinely community-led, including evidence relating to organisational structure, community engagement, local support, long-term management arrangements and financial viability. Where market housing is proposed, viability evidence may also be required. This information is necessary to assess the specific policy tests and would not ordinarily form part of standard planning application documentation. The information requirements are required to demonstrate that proposals

	are genuinely community-led, meet local needs and will deliver long-term community benefit. The information is therefore directly related to the operation of the policy and only applies where development seeks to rely upon the policy's exception provisions.
HOU14 Build to Rent Proposals	Management Plan The policy requires bespoke evidence demonstrating that a proposal will operate as a genuine Build to Rent development. This includes management plans, tenancy and nomination arrangements, affordable private rent management arrangements, evidence supporting proposed dwelling mix and, where relevant, viability evidence. The information is necessary to assess compliance with the specific policy requirements and would not ordinarily be required for standard application documentation. The information requirements only apply where applicants propose a Build to Rent development and are directly related to the operation of the policy. The management and affordability information is necessary to distinguish Build to Rent development from conventional market housing and to assess whether affordable private rent provision will be secured and managed appropriately over the long term.
JT2 Protecting Our Employment Sites	Non-viable employment land study Where development would result in the loss of employment land or buildings, supporting text (paragraphs 7.22, 7.23 and Appendix 6) requires applicants to provide evidence demonstrating that the employment use is no longer economically viable and that there is no market demand for continued employment use. This typically requires bespoke marketing and viability evidence that is not normally incorporated within general planning application documentation, and it is necessary to assess compliance with the policy.
JT7 Overnight Visitor Accommodation	Visitor accommodation viability and reuse information & Mooring demand evidence Requires marketing evidence for loss of visitor accommodation, to demonstrate that continued visitor accommodation use is not viable and that reuse has been considered. This could be demonstrated within a planning statement, and viability assessments are already on the council's validation checklists. Guidance on compliance is included in Appendix 6 of the JLP. Mooring demand evidence is more bespoke and required to satisfy compliance with Policy JT7.

TCR2 Strategy for Town and Local Service Centres	Marketing evidence and loss of retail floorspace evidence The policy requires bespoke evidence in specific circumstances. Retail and commercial leisure development exceeding locally set thresholds must be supported by an impact assessment to demonstrate effects on town centre vitality, viability, consumer choice and investment. Retail Impact Assessments are explicitly contemplated by national policy and are only required where proposals exceed locally justified floorspace thresholds (Category B). In addition, proposals involving the loss of retail floorspace within Primary Shopping Areas must provide evidence of at least twelve months active marketing demonstrating that there is no realistic prospect of continued retail use. These requirements are necessary to assess specific policy tests and would not ordinarily apply to all development proposals or form part of normal planning application documentation. (Category C). The information is proportionate to the nature of the proposal and necessary to assess compliance with the relevant policy tests.
TCR4 Retail and Service Provision in Villages and Local Centres	Retail/commercial leisure impact assessment While impact assessments are recognised by the NPPF, this requirement arises because the policy applies a locally justified threshold aimed at protecting smaller centres. The policy requires bespoke evidence in specific circumstances. Retail and commercial leisure development exceeding locally set thresholds must be supported by an impact assessment demonstrating the effect on village and local centres. Proposals involving the loss of existing shops or service uses must provide evidence, including at least twelve months active marketing and, where relevant, viability evidence, to demonstrate that the premises are no longer needed or viable. This information is necessary to assess specific policy tests and would not ordinarily be required for all development proposals or be part of planning application documentation. The information requirements are proportionate and only apply in specific circumstances where development could affect the vitality and viability of village and local centres or result in the loss of existing local facilities. The evidence is necessary to determine whether the policy's exception tests are satisfied and to assess the potential impacts on local service provision.
HP1 Healthy Place Shaping	Health Impact Assessment (major development only)

	Major development proposals only, must submit a Health Impact Assessment undertaken in accordance with the Oxfordshire Health Impact Assessment Toolkit (or equivalent future document). This is a bespoke assessment required by the policy to assess health and wellbeing impacts and demonstrate how these have informed the design of the proposal. The requirement applies only to major development and is proportionate to the scale of development proposed. This is already a requirement for strategic sites in South and Vale. However the Oxfordshire toolkit is new guidance to assist in the preparation of the assessments.
HP2 Community Facilities and Services	Evidence to support loss of community facility/service The policy requires bespoke evidence where proposals would result in the loss or change of use of an existing community facility. Applicants may need to demonstrate that replacement provision would provide an equivalent or improved service, that a facility is no longer needed, or that an existing use is no longer economically viable through an open-book financial assessment. Additional evidence may also be required relating to community engagement and alternative provision. This information is necessary to assess the specific policy tests and would not ordinarily form part of standard planning application documentation. The evidence is necessary to assess whether one of the policy's exception tests has been satisfied and to ensure communities do not lose valued facilities without adequate justification. The requirements are therefore proportionate and directly related to the operation of the policy.
HP3 Health Care Provision	Loss of healthcare assessment The policy requires bespoke evidence where proposals would result in the loss or change of use of existing healthcare facilities. Applicants may need to demonstrate that replacement provision would provide an equivalent or improved service, that a facility is no longer needed, or that a commercial service is no longer economically viable. This information is necessary to assess the specific policy tests and would not ordinarily form part of standard planning application documentation.
HP4 Existing Open Space, Sport and Recreation Facilities	Assessment of loss of open space The policy requires bespoke evidence where development would result in the loss of open space, sports or recreation facilities. Applicants may need to demonstrate that replacement provision is equivalent or better, that

	alternative provision outweighs the loss, or that the facility is surplus to requirements. Supporting evidence may include assessments informed by the councils' leisure, playing pitch and open space evidence base, together with information regarding future ownership, management and stewardship arrangements. This information is necessary to assess the policy's specific tests and would not ordinarily form part of standard planning application documentation. The evidence is necessary to demonstrate compliance with the policy's exception tests and to ensure that the loss of valued recreational assets is only permitted where appropriately justified. The information requirements are therefore proportionate and directly related to the operation of the policy.