



Joint Local Plan

Regulation 22 Consultation Statement Appendix H

Submission Version
(Regulation 22)

December 2024

Contents

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Appendix H - Key issues raised during the Pre-submission Publication Period by Joint Local Plan chapter or topic

Following the conclusion of the Pre-submission Publication Period, we read each response received and analysed the contents to identify the issues raised.

Section 4 of the Regulation 22 Consultation Statement provides a summary of the main issues raised pursuant to Regulation 20.

This appendix provides a detailed breakdown of key issues raised during the Pre-submission Publication Period by Joint Local Plan chapter or plan area.

The tables below provide information on how many individual responses were received in relation to each chapter, policy or plan area.

During analysis, responses received via email were manually 'tagged' in our consultation platform (Citizen Space) by officers against the relevant policy or plan area, to attribute them to the appropriate section. Where respondents submitted their comments directly via the online survey, their responses were analysed initially in the context of the policies or plan area they responded to. Where key issues were better placed under a different policy or plan area, this has been adjusted during reporting to avoid duplication.

Each response received has been published in full on the [Joint Local Plan Pre-submission Publication Period Responses web page](#).

Chapter 1: Introduction

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-------------------------------|---------------|------------------|-------------------|-------------------|---|
| General comments on Chapter 1 | 25 | Yes: 1 No: 15 | Yes: 2 No: 7 | Yes: 2 No: 6 | <ol style="list-style-type: none"> 1. Concern raised by respondents regarding the accelerated JLP timetable, noting that it was ambitious and questioning whether it allowed for sufficient engagement and review. 2. Concerns raised regarding the plan period, noting that: <ol style="list-style-type: none"> a. it is not consistent with national policy to start the plan period in 2020 and should instead start it in 2024. b. it is not justified and should be extended to 2042 or 2043 due to account for delays in plan-making process. 3. Concern raised regarding alignment with new National Planning Policy Framework (NPPF). |

Chapter 2: About the Districts

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-------------------------------|---------------|-----------------|-------------------|-------------------|---|
| General comments on Chapter 2 | 3 | Yes: 1 No: 1 | Yes: 2 No: 0 | Yes: 2 No: 0 | <ol style="list-style-type: none"> 1. Some respondents questioned whether the plan is in accordance with NPPF (2023) paragraph 16(c) regarding meaningful engagement, citing: <ol style="list-style-type: none"> a. the priority issues remaining the same from the issues consultation. b. the response rate to the consultations being low. c. the critical of the positive frame of the consultation statement. |

Chapter 3: Vision and objectives

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-------------------------------|---------------|------------------|-------------------|-------------------|---|
| General comments on Chapter 3 | 93 | Yes: 5 No: 52 | Yes: 7 No: 34 | Yes: 10 No: 29 | <ol style="list-style-type: none"> 1. Some respondents did not consider the vision and objectives to be positively prepared or justified due to a range of reasons and proposed a variety of amendments to make them sound. 2. The vision and objectives should more explicitly reference the need to facilitate the delivery of housing (including housing need & tackling affordable housing). 3. Some respondents questioned the brownfield first objective, as they considered the availability of brownfield sites across the district to be limited, and therefore it may not be deliverable action. They considered some greenfield sites will be required. 4. Some respondents considered the vision to be too generic and/or vague. 5. Inconsistency was noted between the objectives to urgently address climate change and safeguarding land for road schemes / provision of new homes. |

Chapter 4: Climate change and improving environmental quality

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-------------------|-------------------|-------------------|--|
| General comments on Chapter 4 | 35 | Yes: 3 No: 19 | Yes: 3 No: 2 | Yes: 1 No: 10 | <ol style="list-style-type: none"> 1. Concern was raised with solar development being permitted in the Green Belt. 2. Respondents felt policies in chapter should: <ol style="list-style-type: none"> a. be more flexible to ensure no viability or delivery impacts. b. not go beyond Building Regulations. 3. Some respondents felt the chapter lacks reference to the impact of transport on climate change and doesn't support the Joint Local Plan objective 2 on reducing car trips. |
| Policy CE1: Sustainable design and construction | 85 | Yes: 20 No: 50 | Yes: 44 No: 2 | Yes: 45 No: 4 | <ol style="list-style-type: none"> 1. Respondents raised concerns that the policy exceeds national requirements, particularly Part 2(c) which sets higher requirements for overheating assessments than Building Regulations. 2. Some respondents were concerned that the requirements of the policy will make development too costly and unviable. |
| Policy CE2: Net zero carbon buildings | 108 | Yes: 17 No: 67 | Yes: 42 No: 7 | Yes: 46 No: 8 | <ol style="list-style-type: none"> 1. Respondents raised concerns that the policy exceeds national requirements, particularly citing the December 2023 Written Ministerial Statement. 2. Some respondents queried the strength of the evidence setting out the justification for departing from the Written Ministerial Statement. 3. Respondents raised concerns that the policy will hinder the delivery of development, citing: <ol style="list-style-type: none"> a. the requirements will make development unviable. b. the skills and existing supply chain are not equipped. 4. Some respondents raised concerns that the policy covers unregulated energy, as well as regulated energy. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--------------------------------------|---------------|-------------------|-------------------|-------------------|--|
| | | | | | 5. Oxford City Council raised that there was inconsistency in the approach to energy offsetting in 6(a) of the policy, where it requires two opposing offsetting requirements which should be corrected to one singular approach (notably energy offsetting rather than carbon offsetting). |
| Policy CE3: Reducing embodied carbon | 87 | Yes: 19 No: 56 | Yes: 41 No: 7 | Yes: 43 No: 8 | <ol style="list-style-type: none"> 1. Respondents raised concerns that the policy requirements will make development unviable, particularly the embodied carbon targets. 2. Respondents raised concerns that the policy exceeds national requirements, particularly the December 2023 Written Ministerial Statement and the Planning & Energy Act 2008. 3. Some respondents suggested the policy could hinder the delivery of brownfield development. |
| Policy CE4: Sustainable retrofitting | 25 | Yes: 18 No: 3 | Yes: 14 No: 1 | Yes: 16 No: 1 | <ol style="list-style-type: none"> 1. Some respondents expressed concerns about the application of the policy to large or complex sites with numerous old and inefficient buildings, particularly citing the cost of undertaking pre-development audits. |
| Policy CE5: Renewable energy | 31 | Yes: 19 No: 7 | Yes: 17 No: 1 | Yes: 20 No: 0 | <ol style="list-style-type: none"> 1. Respondents raised concerns that the policy conflicts with national requirements, particularly para 160a and 163b, suggesting it should be more positively worded to support renewable energy schemes. 2. Some respondents raised concerns about the impact of renewable energy schemes in the Green Belt. |
| Policy CE6: Flood risk | 49 | Yes: 11 No: 32 | Yes: 14 No: 3 | Yes: 12 No: 6 | <ol style="list-style-type: none"> 1. The Environment Agency suggested the policy approach to development on brownfield land in Flood Zone 3b is unclear and potentially conflicts with NPPF (2023) para 165. 2. Some respondents raised concerns that further development will increase flood risk, referencing flooding in specific locations. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|----------------------|-------------------|--------------------------|--------------------------|--|
| Policy CE7: Water efficiency | 71 | Yes: 14 No: 50 | Yes: 31 No: 5 | Yes: 33 No: 4 | <ol style="list-style-type: none"> 1. Respondents raised concerns that the policy exceeds national requirements as it sets a water efficiency standard for new homes that goes beyond the Building Regulations. 2. Respondents raised concerns that there is a lack of evidence or justification for a more ambitious standard. 3. Thames Water suggested the policy should require the 'fittings approach' to achieving water efficiency standards, rather than the 'calculation method' which is less effective. |
| Policy CE8: Water quality, wastewater infrastructure and drainage | 73 | Yes: 10 No: 48 | Yes: 31 No: 4 | Yes: 31 No: 6 | <ol style="list-style-type: none"> 1. The Environment Agency has significant concerns about sewage treatment work capacity and water quality. A detailed Water Cycle Study is needed to show that development can be delivered, supported by sufficient infrastructure, without negative impacts on water quality. 2. Respondents suggested that it is unreasonable to require developers to undertake sewage capacity assessments, as this is the responsibility of the service provider. 3. Respondents suggested that the policy wording regarding water efficiency conflicts with Policy CE7. 4. Concerns that Grampian conditions could hold up delivery and occupation of homes. 5. Concerns that the policy exceeds national requirements, as it requires development to enhance water quality, whilst the NPPF (2023) wording is 'wherever possible'. |
| Policy CE9: Air Quality | 31 | Yes: 13 No: 11 | Yes: 14 No: 0 | Yes: 14 No: 0 | <ol style="list-style-type: none"> 1. Concerns that Point 1 exceeds national requirements, as it requires development to enhance air quality, whilst the NPPF (2023) wording is 'wherever possible'. 2. Some concerns that the thresholds for requiring Air Quality Assessments are not appropriate and may not be proportionate for some development. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|-------------------|--------------------------|--------------------------|--|
| Policy CE10: Pollution sources and receptors | 22 | Yes: 15 No: 1 | Yes: 11 No: 0 | Yes: 11 No: 0 | 1. Some respondents raised concerns that requirements around noise and air pollution will limit the scope for development around the A34 and A420. |
| Policy CE11: Light pollution and dark skies | 39 | Yes: 19 No: 13 | Yes: 17 No: 2 | Yes: 20 No: 2 | <ol style="list-style-type: none"> 1. Some respondents expressed concerns about maintaining an appropriate balance between reducing lighting and ensuring safety and security. 2. Some respondents expressed concerns the policy is overly lengthy, and prescriptive, particularly in E1 areas. 3. Some respondents raised concerns that the policy was not appropriately tested in the Viability Report. |
| Policy CE12: Soils and contaminated land | 41 | Yes: 12 No: 24 | Yes: 15 No: 0 | Yes: 15 No: 3 | <ol style="list-style-type: none"> 1. Some respondents were concerned that requirement for development on Best and Most Versatile (BMV) agricultural land to provide a soil handling plan and sustainable soil management strategy based on detailed soil surveys: <ol style="list-style-type: none"> a. lacks evidence to justify the requirements. b. lack clarity on what developers must provide. c. lacks flexibility. 2. Concerns that the policy does not align with the NPPF (2023). 3. Specific concerns about contaminated land at Dalton Barracks. |
| Policy CE13: Minerals safeguarding areas | 9 | Yes: 5 No: 1 | Yes: 5 No: 0 | Yes: 5 No: 0 | No key issues raised. |

Chapter 5: Spatial strategy and settlements

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-------------------------------|---------------|---------------------|-------------------|-------------------|--|
| General comments on Chapter 5 | 23 | Yes: 2 No: 12 | Yes: 1 No: 4 | Yes: 2 No: 5 | <ol style="list-style-type: none"> 1. Some respondents raised concern that: <ol style="list-style-type: none"> a. the plan does not support Neighbourhood Plans. b. the focus on Science Vale has been removed after Regulation 18, although other respondents felt there was too much focus on Science Vale. 1. Comments raised regarding the Green Belt, suggesting that the plan should: <ol style="list-style-type: none"> a. show where Green Belt has been previously released. b. confirm for transparency whether any more Green Belt is proposed to be released. |
| Policy SP1: Spatial strategy | 278 | Yes: 112 No: 137 | Yes: 39 No: 78 | Yes: 40 No: 29 | <ol style="list-style-type: none"> 1. Significant support noted for the strategy and particular elements of it like the focus on Science Vale, although other respondents raised concern about over-supply or over-concentration of growth in Science Vale. 2. Policy should be relying less on strategic and windfall sites and more on market towns or other smaller settlements. Respondents raised concern that the strategy might limit the ability for settlements to grow and thrive (and may make them less sustainable). 3. Many respondents promoted sites across the district, including sites within or near to the Tier 1 settlements with further representations made against those individual policies. 4. Other sites were promoted in lower tier settlements, with concern raised about alignment with the spatial strategy. For instance: |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-------------------------------------|---------------|--------------------|-------------------|-------------------|--|
| | | | | | <ul style="list-style-type: none"> a. various concerns were raised about the limitations of what brownfield land delivery is likely given the nature of the districts, the available brownfield land, and viability concerns. b. respondents identified specific areas or sites to be removed from the Green Belt, or the need to review the Green Belt generally is justified to accommodate more development. <ol style="list-style-type: none"> 5. Concern about the strategies outcome of having an over-reliance on larger sites rather than smaller ones and their risk of delay. 6. Concern that more focus is needed in the strategy to meet further unmet needs of Oxford, with effective cooperation required to inform the strategy. 7. Criticisms of the role of Neighbourhood Plans, either being over-relied upon or not relied upon enough. 8. SA assessment of spatial strategy options is flawed, particularly with respect to option B and the assessment of alternatives. |
| Policy SP2: Settlement hierarchy | 152 | Yes: 25 No: 101 | Yes: 47 No: 28 | Yes: 29 No: 16 | <ol style="list-style-type: none"> 1. Disagreement with classification of a number of individual settlements, with respondents stating that the settlement tier is too high, and others stating that a settlement is located too low in the hierarchy. 2. Respondents raised concern that the strategy might limit the ability for settlements to grow and thrive (and may make them less sustainable). 3. The policy is too restrictive, citing: <ul style="list-style-type: none"> a. the need for development in more tiers. b. more development should be allowed within each individual tier. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-----------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> c. development should not be limited to within the built-up area. d. some development is needed in the countryside. e. does not support the presumption in favour of sustainable development in the NPPF (2023). <p>4. Concern that there is an over-reliance on large sites and brownfield sites, citing:</p> <ul style="list-style-type: none"> a. the limitations of what brownfield land delivery is likely, given the nature of the districts, the available brownfield land, and viability concerns. b. it would be more appropriate to deliver a mix of sites. <p>5. The policy is not consistent with Policy SP1 in that the local plan housing allocations have not been considered within the context of the settlement hierarchy and the allocations and their potential have not been incorporated within the hierarchy.</p> <p>6. Failure to plan for additional growth around edge of Oxford and Reading.</p> |
| Policy SP3: The strategy for Didcot Garden Town | 22 | Yes: 5 No: 9 | Yes: 7 No: 0 | Yes: 4 No: 0 | 1. Concern there is not enough development to realise the vision for Didcot. |
| Policy SP4: A strategy for Abingdon-on-Thames | 10 | Yes: 5 No: 3 | Yes: 4 No: 1 | Yes: 5 No: 1 | <ul style="list-style-type: none"> 1. Concerns that Abingdon needs more housing and employment allocations, although other respondents raised concern about the traffic implications of further growth. 2. Concern that policy doesn't address potential impact of forthcoming Thames Water reservoir. 3. Various additional specific environmental aims and references are suggested for this policy. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|----------------------|-----------------|--------------------------|--------------------------|--|
| Policy SP5: A strategy for Faringdon | 9 | Yes: 2 No: 3 | Yes: 4 No: 0 | Yes: 4 No: 0 | 1. Concerns that Faringdon needs more housing allocations, with more housing required after the end of the current NDP period. |
| Policy SP6: A strategy for Henley-on-Thames | 11 | Yes: 3 No: 4 | Yes: 5 No: 0 | Yes: 5 No: 0 | 1. Concerns that Henley needs more housing allocations (particularly more affordable housing) or NDP needs to plan for more, although other respondents did not feel more housing was required. |
| Policy SP7: A strategy for Thame | 10 | Yes: 2 No: 5 | Yes: 3 No: 2 | Yes: 5 No: 0 | 1. Concern about conflicts between the policy and the emerging Thame NDP, particularly with respect to the Primary Shopping Area designation. 2. Concern that Thame needs more housing allocations or NDP needs to plan for more. |
| Policy SP8: A strategy for Wallingford | 11 | Yes: 3 No: 6 | Yes: 4 No: 2 | Yes: 5 No: 1 | 1. Concern about conflicts between the policy and the Wallingford NDP review. 2. Concern that Wallingford needs more housing allocations or NDP needs to plan for more, although other respondents raised concern about the existing amount of new development and corresponding infrastructure capacity. |
| Policy SP9: A strategy for Wantage | 8 | Yes: 4 No: 2 | Yes: 5 No: 0 | Yes: 5 No: 0 | No key issues raised. |

Chapter 6: Housing

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-------------------------------|---------------|------------------|-------------------|-------------------|--|
| General comments on Chapter 6 | 48 | Yes: 1 No: 33 | Yes: 3 No: 20 | Yes: 5 No: 16 | <ol style="list-style-type: none"> 1. Some respondents were concerned the plan's housing requirement is not high enough, citing it doesn't: <ol style="list-style-type: none"> a. align with economic growth aspirations. b. address unmet housing need from Oxford in fall. c. align with proposed changes to the NPPF and the proposed new Standard Method. 2. As a result of concerns regarding Housing requirement the supply should be increased to align with the actual need. 3. Others commented that supply of housing in plan should be reduced as it significantly exceeds housing need / requirement. 4. Some comments were received raising concern about compliance with the Duty to Co-operate, these included: <ol style="list-style-type: none"> a. highlighting issues raised at the examination of the Oxford City Local Plan. b. the plan fails to address unmet need from neighbouring authorities (Oxford and Reading). c. concerns about a lack of Statements of Common Ground. 5. Some respondents were concerned about a lack of small and medium sites and a reliance on large scale development to meet the overall housing need and needs of specific groups. 6. Concern was raised about the suitability of specific sites ('land east of Sutton Courtenay' and 'Land Adjacent to Culham Campus'). 7. Other sites were promoted. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|----------------------------------|---------------|--------------------|-------------------|-------------------|--|
| Policy HOU1: Housing requirement | 192 | Yes: 33 No: 132 | Yes: 30 No: 98 | Yes: 41 No: 76 | <ol style="list-style-type: none"> 1. Many respondents don't agree with the housing numbers proposed in the plan, because they think the need is greater, citing: <ol style="list-style-type: none"> a. they think more unmet need should be accounted for – either from Oxford or other adjacent authorities (e.g., Reading and Swindon). b. it should draw from the HENA / OGNA. c. there should be more to accommodate employment growth / or more evidence to demonstrate a sustainable balance between the two. d. the plan should plan for the proposed new standard method. e. more housing is needed to meet affordable housing needs. f. average housing completions in the past have exceeded the standard method figure. g. two years of contribution towards unmet need between 2019 and 2021 should not be deducted from the Vale of White Horse housing requirement. 2. Other respondents either agreed with the housing numbers or felt the housing numbers were already too high, with some feeling the policy includes too much unmet need for Oxford. 3. Concern about the alignment with the current and emerging NPPFs, including whether sufficient assessment of housing need has been undertaken and if the justification exists to depart from the existing standard method. 4. Concerns about the plan period starting in 2021 (prior to adoption). |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|--------------------|-------------------|-------------------|--|
| Policy HOU2: Sources of housing supply | 161 | Yes: 14 No: 121 | Yes: 37 No: 51 | Yes: 44 No: 42 | <ol style="list-style-type: none"> 1. Concern about an overreliance on large sites, which may impact short term housing delivery. 2. There is a lack of evidence on: <ol style="list-style-type: none"> a. the breakdown of the overall supply. b. the contribution from small sites. c. reliance on windfall sites. 3. Concern that there isn't enough housing supply because respondents felt the plan need is too low, although some respondents felt that the housing supply should be decreased. as there is a significant over supply against the requirement. 4. Allocated / carried forward site should be removed or amended. 5. Supply from sites completed prior to adoption of the plan should not be included (following from comments on the housing requirement that the plan period should not pre-date adoption). 6. Other sites were promoted. |
| Policy HOU3: Affordable housing | 115 | Yes: 112 No: 74 | Yes: 33 No: 25 | Yes: 37 No: 21 | <ol style="list-style-type: none"> 1. Cumulative effect of policies in the plan make development unviable, e.g., affordable housing. 2. Increase housing requirement to ensure affordable need is met in full, for instance, deliver more housing with a lower affordable housing percentage to then deliver a greater quantum of affordable housing. 3. Affordable housing target not achievable based on past delivery. 4. Affordable housing and tenure mix may not be achievable on large sites which the plan relies on due to abnormal infrastructure costs. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---------------------------------------|---------------|------------------|-------------------|-------------------|---|
| | | | | | <p>5. The policy does not sufficiently account for variation in viability across different locations and development types.</p> <p>6. Alternative approaches / quantum of affordable housing proposed.</p> |
| Policy HOU4: Housing mix and size | 68 | Yes: 4 No: 41 | Yes: 26 No: 7 | Yes: 27 No: 6 | <p>1. Respondents raised concerns that the policy's bedroom mix requirements are overly prescriptive, citing:</p> <ul style="list-style-type: none"> a. schemes would be unable to respond to local context, changing needs through the plan period, and market forces. b. a threshold should be introduced as smaller sites will be unable to meet the percentages. c. concerns with the evidence supporting this requirement. <p>2. Respondents raised concerns regarding the provision of M4(3) dwellings, citing:</p> <ul style="list-style-type: none"> a. the evidence to support the policy is unclear, particularly regarding the different requirements for each district. b. M4(3) dwellings may negatively impact viability and land take. <p>3. Some respondents raised concerns that requirement for all homes to be delivered to M4(2) standards may cause viability issues.</p> |
| Policy HOU5: Housing for older people | 50 | Yes: 4 No: 40 | Yes: 24 No: 4 | Yes: 26 No: 3 | <p>1. Respondents expressed concerns that the policy does not make appropriate provision for the identified need for specialist housing for older people, citing:</p> <ul style="list-style-type: none"> a. the policy only allocates for housing with care, not housing with support. b. it is unlikely the need for specialist housing will be fully met by the allocations or windfall sites. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|------------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> c. the policy does not make any provision for care homes. 2. Respondents suggested the policy should make allocations of smaller and/or self-contained sites to improve delivery. 3. Respondents expressed concerns about the requirement for housing with care on allocated sites in the Joint Local Plan, suggesting: <ul style="list-style-type: none"> a. the requirement has been added too late in the plan-making process. b. it is unclear if housing with care is additional to the quantum of homes in the allocation policies. c. there is no trajectory for the delivery so will be no supply in the short term. 4. Some respondents raised concerns that the requirement for all housing with care to be delivered to M4(3) standards would have viability issues that were not appropriately considered in the Viability Report. |
| Policy HOU6: Self-build and custom-build housing | 43 | Yes: 2 No: 40 | Yes: 19 No: 5 | Yes: 20 No: 5 | <ul style="list-style-type: none"> 1. Do not support the requirement on large scale major developments as it undermines deliverability and incompatible with single plots by individuals. 2. The plan should identify specific sites where self-build can be delivered to align with the preference of self-builders. 3. The 5% requirement for plots on large scale major developments is not justified by evidence of need or demand. 4. The reliance on large scale developments to meet demand is contrary to national policy (NPPF 2023 para 70). |
| Policy HOU7: Affordable self and custom-build housing | 3 | Yes: 2 No: 1 | Yes: 2 No: 0 | Yes: 2 No: 1 | No key issues raised. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|------------------|--------------------------|--------------------------|---|
| Policy HOU8: Replacement dwellings in the countryside | 7 | Yes: 3 No: 2 | Yes: 3 No: 0 | Yes: 3 No: 1 | 1. Respondents raised concerns that the policy exceeds national requirements and is overly prescriptive. |
| Policy HOU9: Sub-division of houses | 6 | Yes: 3 No: 1 | Yes: 3 No: 0 | Yes: 4 No: 1 | 1. Historic England suggested the policy should reference the significance of heritage assets. |
| Policy HOU10: Meeting the needs of Gypsies, Travellers and Travelling Showpeople | 13 | Yes: 1 No: 6 | Yes: 1 No: 1 | Yes: 1 No: 0 | 1. Not supported by up-to-date evidence on the need for pitches. 2. Provision of pitches will impact the ability of strategic housing allocations to make efficient use of the land allocated. |
| Policy HOU11: Safeguarding existing Gypsy, Traveller and Travelling Showpeople's sites | 1 | Yes: 1 No: 0 | Yes: 1 No: 0 | Yes: 1 No: 0 | No key issues raised. |
| Policy HOU12: Rural and First Homes exception sites | 20 | Yes: 4 No: 14 | Yes: 5 No: 0 | Yes: 5 No: 9 | No key issues raised. |
| Policy HOU13: Community-led housing development | 7 | Yes: 4 No: 2 | Yes: 4 No: 0 | Yes: 4 No: 0 | 1. The plan should not restrict sites in terms of overall development numbers as it is contrary to proposed changes in the emerging NPPF. |
| Policy HOU14: Build to Rent proposals | 3 | Yes: 2 No: 1 | Yes: 3 No: 0 | Yes: 3 No: 0 | No key issues raised. |
| Policy HOU15: Houses in Multiple Occupation | 3 | Yes: 1 No: 2 | Yes: 2 No: 0 | Yes: 2 No: 0 | 1. One respondent raised concern that there are not enough HMOs within the districts to justify such a restrictive policy. |
| Policy HOU16: Residential extensions and annexes | 7 | Yes: 1 No: 3 | Yes: 2 No: 0 | Yes: 2 No: 1 | No key issues raised. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|-----------------|--------------------------|--------------------------|--------------------------|
| Policy HOU17: Rural workers' dwellings | 12 | Yes: 1 No: 2 | Yes: 1 No: 1 | Yes: 1 No: 1 | No key issues raised. |

Chapter 7: Jobs and tourism

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--------------------------------------|---------------|------------------|-------------------|-------------------|--|
| General comments on Chapter 7 | 12 | Yes: 1 No: 2 | Yes: 1 No: 1 | Yes: 1 No: 1 | <ol style="list-style-type: none"> 1. Oxford City Council raised Duty to Cooperate concerns regarding engagement on strategic employment matters, and also challenged the methodology of the JLP employment evidence base: the Employment Land Needs Assessment (ELNA). 2. There is too much emphasis on developing employment land within Science Vale which needs to be balanced with meeting the needs of the wider, and more local economy, and the foundation economy which underpins the global successes in Oxfordshire. 3. Policies JT1, JT5 and supporting text paragraph 7.38 are contrary to paragraphs 88 & 89 of the NPPF (2023) in that they seek to limit both the location and type of employment development that would be acceptable in rural areas, outside existing settlements, without providing any evidenced justification for this departure from national policy. 4. There is a lack of a sector analysis, or new employment sites, which has the effect of underplaying the importance of the Science, Innovation and Technology sector. The JLP does not take account of market signals, barriers to investment, needs of different sectors, and the importance of major employment sites to the national economy. |
| Policy JT1: Meeting employment needs | 61 | Yes: 6 No: 47 | Yes: 25 No: 15 | Yes: 23 No: 17 | <ol style="list-style-type: none"> 1. Concern the need for employment land is underestimated, particularly within the context of evidence from other organisations that proposes a greater need (e.g., Oxfordshire Local Enterprise Partnership's Strategic Economic Plan, Cherwell District and Oxford City Councils' |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|------------------|-------------------|-------------------|--|
| | | | | | <p>Housing and Economic Needs Assessment and Advanced Oxford's Oxford Innovation Engine).</p> <p>2. The strategy to address the need is not correct, citing:</p> <ol style="list-style-type: none"> there are not enough sites proposed, with an overreliance on windfall. development is too focussed in particular locations, e.g., Science Vale. it constrains growth by an under-delivery based on evidence of historic supply. it is not aligned with Chapter 6 of the NPPF (2023) with respect to support for strong and competitive economies. it does not clearly set out how it meets the future needs of the economy in accordance with the emerging NPPF. <p>3. Other sites were promoted.</p> |
| Policy JT2: Protecting our employment sites | 23 | Yes: 15 No: 5 | Yes: 15 No: 0 | Yes: 15 No: 0 | <p>1. Policy is too restrictive and may constrain sustainable development where retention of sites is no longer necessary. This is contrary to the NPPF (2023) (particularly Chapter 11) regarding making effective use of land.</p> <p>2. It is unnecessary to require marketing if a site is already demonstrated to be unviable.</p> |
| Policy JT3: Affordable workspace | 19 | Yes: 12 No: 4 | Yes: 13 No: 0 | Yes: 13 No: 0 | <p>1. Concerns raised about the viability and feasibility of delivering affordable workspace.</p> |
| Policy JT4: Community Employment Plans | 6 | Yes: 2 No: 0 | Yes: 1 No: 0 | Yes: 1 No: 0 | No key issues raised. |
| Policy JT5: Supporting the rural economy | 17 | Yes: 4 No: 12 | Yes: 12 No: 0 | Yes: 11 No: 1 | <p>1. Concern that the policy is aimed at controlling and suppressing opportunities, with little proactive or positive text about how and where rural enterprise might flourish.</p> |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|-----------------|--------------------------|--------------------------|--|
| | | | | | 2. Policy is contrary to the NPPF (2023) (paras 88 and 89) regarding supporting the rural economy. |
| Policy JT6: Supporting sustainable tourism and the visitor economy | 5 | Yes: 3 No: 2 | Yes: 3 No: 0 | Yes: 3 No: 0 | 1. Policy requirements are too onerous and may prevent development coming forward in some locations that may otherwise be appropriate (for instance, locations outside settlement boundaries). |
| Policy JT7: Overnight visitor accommodation | 6 | Yes: 3 No: 1 | Yes: 2 No: 0 | Yes: 2 No: 0 | No key issues raised. |

Chapter 8: Site allocations and Garden Villages

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-------------------------------|---------------|------------------|-------------------|-------------------|--|
| General comments on Chapter 8 | 45 | Yes: 3 No: 19 | Yes: 9 No: 4 | Yes: 10 No: 2 | <p>1. There were a number of comments raised in this chapter regarding:</p> <ul style="list-style-type: none"> a. concerns about deliverability of Biodiversity Net Gain (BNG) on all site allocations. b. concerns about the new addition of Gypsy and Traveller pitches and extra care requirements in the Regulation 19 plan, which respondents felt weren't appropriately evidenced or communicated in advance of publication. c. Oxford City Council stated that the additional requirements for specialist housing types on strategic sites reduced their capacity to meet Oxford's unmet need, also leading to concerns about deliverability of these sites. d. developer and site promoter concerns about not allocating any new sites and concerns that no allocations within the Vale would potentially be subject to policy provisions of the Joint Local Plan due to progression of previously allocated sites. e. requests for a breakdown of housing numbers and trajectory for each site across the plan period. <p>Other key issues raised:</p> <p>2. Site selection:</p> <ul style="list-style-type: none"> a. Concerns regarding evidence justifying that site allocations were deliverable. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--------|---------------|-------|-------------------|-------------------|--|
| | | | | | <ul style="list-style-type: none"> b. Concerns regarding over reliance on large-scale sites and an omission of small/medium sites, with concern that the role of SME housebuilders was not supported. c. Comments that Chalgrove Airfield should continue to be a site allocation because it is deliverable; and that the former South Oxfordshire District Council offices at Crowmarsh Gifford should be a site allocation (as in the Regulation 18 version). d. Many additional and/or alternative sites were promoted, including a request for a policy for Milton Park as another strategic employment site. <p>3. Site Selection Topic Paper:</p> <ul style="list-style-type: none"> a. Concern with the allocated sites' selection and concern that other sites have not been interrogated as potential suitable alternatives or additional allocations. b. Comments that the Topic Paper does not consider the HELAA outcomes. c. Concerns that insufficient justification provided for why sites haven't been allocated. <p>4. Concern that public opinion regarding some sites was not being heard / addressed.</p> <p>5. Thames Water suggested the addition of references to wastewater/water supply network capacity for all site allocations and highlighted the need to liaise with them to determine whether a detailed drainage/water infrastructure strategy is required. They confirmed that upgrades are planned for the sewage treatment works at Abingdon,</p> |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|------------------|-------------------|-------------------|---|
| | | | | | Culham, Didcot and Oxford. For the edge of Oxford sites allocations, they requested that the council agree a suitable Grampian condition with Thames Water to be imposed on grants of planning permission where necessary, to ensure development is undertaken in tandem with the staged delivery of the upgrade works. They also confirmed investigations of the impact of groundwater on the Oxford sewer network. |
| Policy LS1: Proposals for Large Scale Major Development | 50 | Yes: 9 No: 33 | Yes: 21 No: 2 | Yes: 21 No: 1 | <ol style="list-style-type: none"> 1. Comments stated that Part G of the policy is not required and it would be more appropriate to deal with documents required via the Validation Checklist instead. 2. There was unnecessary duplication with other plan policies. 3. Comments stated that the requirements may not be relevant to all applications and others felt the policy was intended just for residential developments. |
| Policy AS1: Land at Berinsfield Garden Village | 24 | Yes: 5 No: 7 | Yes: 4 No: 0 | Yes: 4 No: 0 | <ol style="list-style-type: none"> 1. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including: <ol style="list-style-type: none"> a. requesting clarification over the provision of care home units in addition to the 1,700 allocated. b. concerns about the delivery of pitches for Gypsies and Travellers c. concerns over the deliverability of proving 50% affordable housing on site, especially considering the necessary regeneration package at Berinsfield. d. concerns over the proportional contributions for infrastructure delivery and unknown outcome of the Housing Infrastructure Fund inquiry. e. concerns over the policy reference to the concept plan, claiming that the site promotor's Masterplan Framework Document supersedes this. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|------------------|-------------------|-------------------|--|
| | | | | | <ol style="list-style-type: none"> 2. Oxfordshire County Council made a number of comments on the policy, including commenting that the policy needs to refer to the need for a flood risk assessment. 3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board request amendments to the supporting text to provide further information on the community hub. 4. The Environment Agency raised concerns with water quality, flood risk and the evidence base. 5. Some respondents raised concerns over the potential diversions of buses from A4074 to the site. |
| Policy AS2: Land adjacent to Culham Campus | 48 | Yes: 6 No: 29 | Yes: 6 No: 2 | Yes: 7 No: 2 | <ol style="list-style-type: none"> 1. Flooding and sewage concerns were a key issue for this site allocation: <ol style="list-style-type: none"> a. Oxfordshire County Council stated that the policy needs to clarify that a flood risk assessment is required which will include detailed flood risk modelling. b. The Environment Agency raised concerns with water quality and the evidence base. They requested strengthening the policy in relation to flood risk and asked for specific wording amendments regarding the River Thames ecological buffer zone. c. There was local resident and parish concern that flood risk to existing neighbouring communities will increase. 2. Concerns from local residents and parish councils regarding the scale of the allocation. A number of people objected to the overall policy, suggesting the proposals were not required. There were many suggestions to reduce the number of homes to 700-800 due to an excess supply of |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--------|---------------|-------|-------------------|-------------------|--|
| | | | | | <p>homes over need and the negative impact on: infrastructure (including transport/traffic/local services) the environment (including air quality), biodiversity, flood risk/sewage and the Green Belt. There were suggestions that a secondary school should be located elsewhere and requests for development of safe walking and cycle routes to Abingdon and beyond.</p> <ol style="list-style-type: none"> 3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board suggested additional wording and rewording of the policy regarding healthcare provision. 4. There was a recommendation that Culham Railway Station should become a mobility hub with interchange; however conversely there were concerns that the small station risked becoming a Parkway. 5. Concern regarding the Housing Infrastructure Fund 1 scheme overall including points about its delivery, capacity and that the scheme would make carbon reduction targets unachievable. 6. Thames Travel stated that a sustainable transport strategy is needed for the A4074, involving comprehensive bus priority measures and effective consolidation, as well as re-modelling of existing car journeys. 7. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including suggestions to amend parts of the policy wording; seeking clarification about housing with care requirements; stating the Gypsy and Traveller pitches did not appear justified; suggesting amendments to the concept plan; and raising issues regarding some infrastructure and facility requirements/obligations and the viability/IDP costings. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-----------------|-------------------|-------------------|---|
| Policy AS3: Land South of Grenoble Road, Edge of Oxford | 26 | Yes: 7 No: 3 | Yes: 3 No: 1 | Yes: 4 No: 1 | <ol style="list-style-type: none"> 1. The Environment Agency raised concern with capacity at the Oxford Sewage Treatment Works to accommodate development and flagged risks regarding any additional flows discharging to this. Amended wording regarding flood risk was suggested. 2. Thames Water noted that there are concerns about the capacity of the Oxford Sewage Treatment Works to accommodate future growth, but that there are plans to upgrade the SWT. They requested that land within their ownership within the boundary is removed from the allocation so the critical upgrade can take place. 3. Oxford City Council raised concerns about the trajectory for delivery, the capacity to accommodate housing for older people and Gypsy and Traveller pitches, and the lack of policy reference to the potential reopening of the Cowley Branch Line. 4. Oxfordshire County Council raised concerns about the lack of policy reference to the potential reopening of the Cowley Branch Line. They also suggested the policy should be amended to be clear a flood risk assessment would be required. They suggested the deletion of duplication between Parts 2) i) v) and 2) i) vii) of the policy. 5. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations. 6. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including: <ol style="list-style-type: none"> a. the requirement for Gypsy and Traveller pitches on site is not justified by evidence and should be removed |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|-----------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> b. the policy should reference land identified for the upgrade and future expansion to Oxford Sewage Treatment Works c. duplication between Parts 2) i) v) and 2) i) vii) of the policy should be deleted. |
| Policy AS4: Land at Northfield, Edge of Oxford | 26 | Yes: 5 No: 6 | Yes: 4 No: 1 | Yes: 4 No: 1 | <ol style="list-style-type: none"> 1. Thames Travel made detailed comments about connections to the site, particularly suggesting the requirement for bus services to nearby villages would not be appropriate. 2. The Environment Agency raised concern with capacity at the Oxford Sewage Treatment Works to accommodate development and flagged risks regarding any additional flows discharging to this. Amended wording regarding flood risk was suggested. 3. Oxford City Council raised concerns about the trajectory for delivery, the capacity to accommodate housing for older people and Gypsy and Traveller pitches, and the lack of policy reference to the potential reopening of the Cowley Branch Line. 4. Oxfordshire County Council raised concerns about the lack of policy reference to the potential reopening of the Cowley Branch Line. They also suggested the policy should be amended to state a flood risk assessment would be required. 5. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations. 6. The site promoter, and Oxfordshire County Council Property Services, supported the inclusion of the policy, however, they raised detailed comments, including: |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|------------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> a. there should be more flexibility around the phrasing of how many homes the site is expected to deliver. b. the policy should be clearer that BNG does not need to be delivered exclusively on site. c. references to an overall site-wide average net density should be restored. |
| Policy AS5: Land at Bayswater Brook, Edge of Oxford | 32 | Yes: 5 No: 12 | Yes: 6 No: 3 | Yes: 5 No: 4 | <ul style="list-style-type: none"> 1. Developers and site promoters suggested the site should have a higher development quantum, particularly in line with the resolution to grant planning permission for 1,450 homes. 2. Developers and site promoters suggested the allocation should be enlarged by the inclusion of land at various locations surrounding the allocation, including areas that would require Green Belt release. The site promoter suggested expansion would contribute towards a potential housing numbers shortfall. They gave detailed explanations of the positive elements of expanding their site allocation. 3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations. 4. Concerns regarding flooding and/or sewage impact: <ul style="list-style-type: none"> a. Oxfordshire County Council stated that the policy needs to clarify that a flood risk assessment is required which will include detailed flood risk modelling. More stringent wording was also recommended regarding flood risk. b. The Environment Agency raised concern with capacity at the Oxford sewage treatment works to accommodate development and flagged risks |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-----------------|-------------------|-------------------|---|
| | | | | | <p>regarding any additional flows discharging to this. Amended wording regarding flood risk was suggested.</p> <p>c. general concern from the public re flooding and sewage issues.</p> <p>5. Historic England requested that the supporting text refer to the need for a landscape buffer to the listed boundary stone mentioned in the recent Heritage Impact Assessment.</p> <p>6. The developer for Sandhills stated that Sandhills should remain part of the site allocation and that reasons given for removal of this part of the allocation were incorrect.</p> <p>7. Concern that it is not possible to mitigate the negative impact on the SSSI.</p> <p>8. Concerns regarding the overall impact of the site allocation on the landscape, traffic and environment and in terms of its design.</p> |
| Policy AS6: Rich's Sidings and Broadway, Didcot | 17 | Yes: 6 No: 3 | Yes: 3 No: 0 | Yes: 3 No: 0 | <p>1. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated that improvements would be required to accommodate development, that appropriate ecological buffer zones should be provided and that flood risk from unmodelled channels needs to be considered.</p> <p>2. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>3. The site promoter supported the inclusion of the policy and also commented that the allocation should make provision for phasing in order to optimise development.</p> |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|-----------------|-------------------|-------------------|---|
| | | | | | <p>4. A developer raised concern that the policy gives no indication of the amount of retail floorspace being allocated and queried consideration of the sequential test and retail impact test. They stated the allocation of retail uses was contrary to NPPF (2023) paragraphs 90d and 90e.</p> <p>5. A developer highlighted that the site should not be within the town centre boundary.</p> |
| Policy AS7: Land at Didcot Gateway, Didcot | 23 | Yes: 6 No: 5 | Yes: 5 No: 0 | Yes: 4 No: 1 | <p>1. Oxfordshire County Council recommended the policy state that a flood risk assessment is required, given the known surface water flood risk.</p> <p>2. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated improvements would be required to accommodate development.</p> <p>3. Thames Travel highlighted a need for a policy requirement for the provision of improved bus stopping facilities on the south side of Station Road.</p> <p>4. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>5. A developer highlighted that proposals on this site that include retail uses should be subject to the sequential test under Policy TCR2.</p> <p>6. A landowner raised detailed comments including:</p> <ol style="list-style-type: none"> a. querying why the Didcot masterplan was not referenced. b. querying sewage infrastructure improvements. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|-----------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> c. suggesting that the policy encourage additional housing where opportunities arise and cautioning about deliverability of some bus priority measures. 7. Multiple landowners also suggested some policy rewording. 8. Concerns that the council failed to: <ul style="list-style-type: none"> a. consider reasonable alternatives. b. base the decision to allocate this site for employment use on proportionate evidence. c. consult on the proposed change in accordance with their SCI. |
| Policy AS8: North West of Grove, Grove | 24 | Yes: 5 No: 5 | Yes: 4 No: 2 | Yes: 4 No: 2 | <ol style="list-style-type: none"> 1. Network Rail suggested the policy should make direct reference to mitigating public safety issues regarding the Grove Level crossing. 2. Historic England suggested the policy should require further heritage assessments. 3. Oxfordshire County Council suggested the policy should clearly require a flood risk assessment and include further green links for greater permeability to the adjacent Grove Airfield site. 4. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations. 5. The Environment Agency raised concerns that the Didcot Sewage Treatment Works is at or over capacity and improvements are needed to accommodate the development proposed through the JLP. 6. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including: |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-----------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> a. there should not be a requirement for extra care on this site, as there is an outline application at an advanced stage of the planning process. b. noise buffers should be multifunctional with public open space. c. the Viability Report has tested the site at Medium Values, despite being in a Low Value Zone, which may misrepresent the viability of the site. d. the IDP makes unreasonable requests which would not meet the tests of Regulation 122 and NPPF (2023). e. the completion of the Grove North Link Road should not be the responsibility of North West of Grove but of Monks Farm. f. signalling the Brook Lane Railway Bridge should not be in the policy. g. some changes were not outlined in the Preferred Options Consultation Statement, and have been added late in the plan making process. h. there is not enough flexibility in transport requirements. |
| Policy AS9: North West of Valley Park, Didcot | 22 | Yes: 5 No: 5 | Yes: 3 No: 1 | Yes: 4 No: 0 | <ul style="list-style-type: none"> 1. The landowner supported the inclusion of the policy; however, they raised detailed comments, including that they believe the site should be called 'Milton Fields' instead of 'North West Valley Park', to align with the original OS map. 2. Valley Park developers suggested the concept plan should include a buffer to the nearby Valley Park development. 3. Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board requested additional policy wording regarding primary healthcare provision. 4. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|-----------------|-------------------|-------------------|---|
| | | | | | 5. Concerns were also raised that the policy should consider a scenario where the Housing and Infrastructure Fund transport proposals for Didcot do not come forward. |
| Policy AS10: Land at Dalton Barracks Garden Village, Shippon | 26 | Yes: 5 No: 6 | Yes: 4 No: 0 | Yes: 4 No: 0 | <ol style="list-style-type: none"> 1. The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust raised concerns about the proximity of the allocation to the Cothill Fen SAC, nearby SSSIs and LWSs. 2. St Helen Without Parish Council suggested that reference is made to the Joint Wootton and St Helen Without Neighbourhood Plan. 3. Thames Travel raised concern with the delivery of a mobility hub, noting that the site is not located on an established high-volume movement corridor. 4. The Environment Agency raised concerns with water quality, flood risk and the evidence base. 5. Oxfordshire County Council commented on the delivery of employment uses on site, noting that use classes should be stipulated and that the overall amount to be delivered be reviewed. 6. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including: <ol style="list-style-type: none"> a. that land to the south and east needs to be safeguarded to enable sustainable access and travel solutions for the site. b. suggestions about extension of the allocation including the removal of additional land from the Green Belt. c. the creation of a new country park. d. concerns about the delivery of Gypsy and Traveller pitches. e. concerns with the concept plan. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|-----------------------------|---------------|-----------------|-------------------|-------------------|--|
| | | | | | f. concerns with the requirements for Suitable Alternative Natural Greenspace (SANG). |
| Policy AS11: Culham Campus | 12 | Yes: 6 No: 5 | Yes: 3 No: 0 | Yes: 3 No: 0 | <ol style="list-style-type: none"> 1. The site promoter supported the inclusion of the policy; however, they raised detailed comments, including: <ol style="list-style-type: none"> a. concern regarding the requirement for an approved masterplan, for which there is no need or justification given that there is a current masterplan that has been used in determining existing planning applications at the site and has been referenced by the Council in its decision-making. b. the allocation of 2.3ha does not reflect the full capacity of the site and should be used as a minimum figure (or removed entirely) 2. Oxfordshire County Council, the Lead Local Flood Authority, noted that the policy does not refer to the requirements of the Strategic Flood Risk Assessment Level 2, and that there are no provisions relating to flood risk within the site policy. 3. Oxfordshire County Council also observed that the concept plan does not show the land safeguarded for the Housing Infrastructure Fund 1 (HIF1). 4. The Environment Agency flagged issues regarding water quality and flood risk 5. Thames Travel welcomed the reference to improvements to the A4074 corridor, but cautioned that they are not defined, costly or clearly deliverable. They also flagged that due to security arrangements at the campus it is not clear that buses will be able to serve the allocation. |
| Policy AS12: Harwell Campus | 11 | Yes: 6 No: 4 | Yes: 4 No: 0 | Yes: 4 No: 0 | <ol style="list-style-type: none"> 1. The site promoter supported the inclusion of the policy, however they raised detailed comments, including that there |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-----------------|-------------------|-------------------|---|
| | | | | | <p>are already two masterplans for Harwell Campus, so there is no need for another masterplan or SPD.</p> <p>2. Thames Travel stated that growth at this site may have impacts on the Strategic Road Network and Chiltern Interchange and set out steps they were taking to support a modal shift away from car use given the site's location remote location.</p> <p>3. The Environment Agency flagged issues regarding water quality and flood risk.</p> |
| Policy AS13: Berinsfield Garden Village | 10 | Yes: 4 No: 3 | Yes: 3 No: 0 | Yes: 3 No: 0 | <p>1. The Environment Agency made the same comments relating to water quality, flood risk and evidence base on AS13 as they did on AS1.</p> <p>2. There was a suggestion that AS13 be combined with AS1 or renumbered alongside it.</p> <p>3. Oxfordshire County Council request deletion of Local Green Space designation.</p> <p>4. Comments that the BNG requirement needs to be amended from 10% to 20% in line with Policy NH2.</p> |
| Policy AS14: Dalton Barracks Garden Village | 13 | Yes: 4 No: 6 | Yes: 5 No: 0 | Yes: 5 No: 0 | <p>1. Respondents raised that the policy should address how the area to the north of the allocation, which remains in the Green Belt and is covered by the Garden Village area, will be managed.</p> <p>2. St Helen Without Parish Council raised that the policy needs to provide clarity on a number of topics such as green infrastructure and open space, highway mitigation, and preservation of rural character.</p> <p>3. The Environment Agency made the same comments relating to water quality, flood risk and evidence base on AS14 as they did on AS10.</p> |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|-----------------|--------------------------|--------------------------|--|
| | | | | | <p>4. Oxfordshire County Council commented that the policy should be consistent with Policy AS13 (Berinsfield Garden Village).</p> <p>5. The site promoter generally supported the inclusion of the policy, though commented that the site allocation should be extended.</p> |
| Policy AS15: Harcourt Hill Campus | 10 | Yes: 5 No: 3 | Yes: 4 No: 0 | Yes: 4 No: 0 | <p>1. A local community group stated that the sport and leisure facilities and the greenspace provision on site are used by the local community and need to be safeguarded.</p> <p>2. The Environment Agency raised significant concerns regarding the capacity of Oxford Sewage Treatment Works.</p> |
| Policy AS16: Vauxhall Barracks, Didcot | 21 | Yes: 4 No: 3 | Yes: 3 No: 0 | Yes: 3 No: 0 | <p>1. The Environment Agency raised concerns regarding the Didcot Sewage Treatment Works capacity and stated improvements would be required to accommodate development.</p> <p>2. Thames Travel stated that the policy needs a stronger hook regarding bus stops as the location is poorly served and that there must be opportunities for a new bus corridor through the site to Great Western Park; and that the site should be counted towards windfall numbers only.</p> <p>3. The Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board stated that health care mitigation should be included within the policy wording and gave detailed wording recommendations.</p> <p>4. The site promoter supported the inclusion of the policy.</p> |

Chapter 9: Town centres and retail

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-----------------|-------------------|-------------------|--|
| General comments on Chapter | 2 | Yes: 1 No: 0 | Yes: 1 No: 0 | Yes: 1 No: 0 | No key issues raised. |
| Policy TCR1: Centre hierarchy | 11 | Yes: 3 No: 5 | Yes: 3 No: 0 | Yes: 3 No: 0 | <ol style="list-style-type: none"> 1. Disagreement with classification of: <ol style="list-style-type: none"> a. Didcot, which should be classified as a principal town centre. b. Botley, which should be classified as a town centre. c. Crowmarsh Gifford, which should not be classified as village local centre. d. Watlington, which is not clearly justified by evidence 2. The Wallingford Neighbourhood Plan boundary should be used as it is clearer and has been considered more carefully at a local level. |
| Policy TCR2: Strategy for town and local service centres | 4 | Yes: 1 No: 2 | Yes: 2 No: 0 | Yes: 2 No: 0 | <ol style="list-style-type: none"> 1. Concern about the flexibility of parts of the policy and the fact it may be difficult to apply them given existing Permitted Development rights and flexibility introduced under Class E. |
| Policy TCR3: Retail floorspace provision (convenience and comparison goods) | 3 | Yes: 1 No: 1 | Yes: 1 No: 0 | Yes: 1 No: 0 | <ol style="list-style-type: none"> 1. Part 1(a) is vague and should not express a preference for 'brownfield/ regeneration sites within defined town or local service centres as this could give preference to 'edge of centre' sites. |
| Policy TCR4: Retail and service provision in villages and local centres | 5 | Yes: 5 No: 0 | Yes: 2 No: 0 | Yes: 2 No: 0 | No key issues raised. |

Chapter 10: Well-designed places for our communities

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|------------------|-------------------|-------------------|--|
| General comments on Chapter 10 | 9 | Yes: 3 No: 3 | Yes: 2 No: 0 | Yes: 2 No: 0 | 1. Some respondents raised concerns that policies in this chapter contain unnecessary duplication between other policies and/or other guidance. |
| Policy DE1: High quality design | 61 | Yes: 14 No: 1 | Yes: 8 No: 0 | Yes: 9 No: 0 | 1. Some respondents raised concerns about the length of the policy, noting that it duplicates requirements from other policies in the plan. 2. Some respondents suggested the policy is more restrictive than national policy, which allows for more flexibility in design. |
| Policy DE2: Local character and identity | 38 | Yes: 9 No: 4 | Yes: 8 No: 0 | Yes: 8 No: 0 | 1. Some respondents raised concerns that the policy will restrict sustainable development in some locations due to character. |
| Policy DE3: Delivering well-designed new development | 51 | Yes: 9 No: 0 | Yes: 5 No: 0 | Yes: 5 No: 0 | 1. Respondents suggested some policy requirements needed further clarification, including: <ul style="list-style-type: none"> a. which applications would require design review. b. who should produce design codes and what they would include. 2. Respondents raised concerns there was unnecessary duplication between this policy and other policies, particularly site allocations and Policy DE1. 3. Respondents raised concerns that the level of engagement and review could slow down the delivery of development. 4. Some respondents suggested design codes are more appropriate for the reserved matters stage, not as part of an outline application. |
| Policy DE4: Optimising densities | 42 | Yes: 4 No: 3 | Yes: 6 No: 0 | Yes: 6 No: 1 | 1. Some respondents suggested the policy is too vague and does not add further detail to national requirements. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|-----------------|--------------------------|--------------------------|---|
| | | | | | 2. Some respondents suggested the requirements for dwellings per hectare (dph) is unevidenced and unjustified. |
| Policy DE5: Neighbouring amenity | 11 | Yes: 3 No: 2 | Yes: 2 No: 0 | Yes: 2 No: 0 | No key issues raised. |
| Policy DE6: Outdoor amenity space | 9 | Yes: 3 No: 0 | Yes: 2 No: 0 | Yes: 2 No: 0 | No key issues raised. |
| Policy DE7: Waste collection and recycling | 11 | Yes: 5 No: 1 | Yes: 3 No: 0 | Yes: 3 No: 0 | 1. Oxfordshire County Council (OCC) suggested the policy should be clearer that that waste management proposals would be considered by OCC as the Waste Planning Authority. |

Chapter 11: Healthy places

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|------------------|-------------------|-------------------|---|
| General comments on Chapter 11 | 11 | Yes: 2 No: 4 | Yes: 2 No: 0 | Yes: 2 No: 1 | <ol style="list-style-type: none"> 1. Some respondents raised concerns regarding the Joint Local Plan Health Impact Assessment, particularly: <ol style="list-style-type: none"> a. that it had not meaningfully informed plan preparation. b. that a different methodology should have been used. c. Oxfordshire County Council suggested restricting hot food takeaways is required to mitigate potential negative impacts of policies TCR1 and TCR2. 2. One respondent suggested the Playing Pitch Strategy leaves ambiguity in what supporting ancillary facilities are required for pitch provision. |
| Policy HP1: Healthy place shaping | 47 | Yes: 3 No: 24 | Yes: 1 No: 0 | Yes: 18 No: 3 | <ol style="list-style-type: none"> 1. Respondents raised concerns that the requirement to produce a Health Impact Assessment (HIA) is too onerous and would cover too many applications. 2. Some respondents suggested as a plan wide HIA has been undertaken, individual HIAs for applications are unnecessary. 3. Some respondents suggested the Oxfordshire Health Impact Assessment Toolkit or equivalent document should be given regard to, not required to be followed. |
| Policy HP2: Community facilities and services | 19 | Yes: 9 No: 5 | Yes: 7 No: 1 | Yes: 8 No: 1 | <ol style="list-style-type: none"> 1. Respondents commented that the policy should reference the needs of minority religious groups. 2. Respondents suggested potential changes to the policy, citing: <ol style="list-style-type: none"> a. removing reference to viability of a facility as a consideration for change of use. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|------------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> b. expanding definition of community uses to include other types of education facilities. <p>3. Some concerns were raised about educational sites, including:</p> <ul style="list-style-type: none"> a. community uses cannot be delivered on education estate. b. the policy will be too restrictive for schools looking to restructure their estate. |
| Policy HP3: Health care provision | 11 | Yes: 4 No: 2 | Yes: 2 No: 0 | Yes: 2 No: 0 | 1. Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board commented that requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facilities adds unjustified delay to vital reinvestment in local health facilities/services. |
| Policy HP4: Existing open space, sport and recreation facilities | 31 | Yes: 22 No: 5 | Yes: 5 No: 0 | Yes: 22 No: 0 | 1. Comments identified locally specific issues from the councils' leisure facilities assessment and strategy (LFAS). |
| Policy HP5: New facilities for sport, physical activity and recreation | 23 | Yes: 17 No: 2 | Yes: 2 No: 0 | Yes: 17 No: 1 | No key issues raised. |
| Policy HP6: Green infrastructure on new developments | 45 | Yes: 20 No: 5 | Yes: 5 No: 1 | Yes: 20 No: 2 | <p>1. The policy should reference the protection of Strategic Green Infrastructure areas, which as drafted does not fully meet NPPF (2023) requirements.</p> <p>2. Oxfordshire County Council suggested the policy directly references:</p> <ul style="list-style-type: none"> a. information in evidence documents instead of referencing the evidence documents more generally (in particular regarding the Urban Greening Factor target). |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|------------------|-------------------|-------------------|---|
| | | | | | b. the Oxfordshire Local Nature Recovery Strategy. |
| Policy HP7: Open space on new developments | 37 | Yes: 20 No: 2 | Yes: 2 No: 0 | Yes: 18 No: 0 | No key issues raised. |
| Policy HP8: Provision for children's play and spaces for young people | 38 | Yes: 18 No: 2 | Yes: 2 No: 0 | Yes: 18 No: 0 | 1. Some respondents queried and purpose and application of Part 7 of the policy, which requires developers of large-scale major development to undertake assessments of existing play facilities within the surrounding area to provide complementary provision. |
| Policy HP9: Provision of community food growing opportunities | 34 | Yes: 19 No: 1 | Yes: 2 No: 0 | Yes: 19 No: 0 | 1. Some respondents suggested the policy should encourage community food growing opportunities, rather than require them. |
| Policy HP10: Watercourses | 31 | Yes: 10 No: 8 | Yes: 11 No: 0 | Yes: 12 No: 0 | <ol style="list-style-type: none"> 1. Cumulative effect of policies in the plan make development unviable, e.g., HP10 requirements. 2. Concern regarding the 10m buffer zone, citing: <ol style="list-style-type: none"> a. there is no evidence to support a 10m buffer. b. it should not apply to canals. c. the approach will restrict the developable area of sites and overall housing delivery. d. a need for further clarity on what constitutes a smaller buffer zone (in Part 2 of the policy). e. the need for a clearer definition on where it will be measured from, raised by the Environment Agency. f. the need to optimise opportunities to remove hard bank protection and infrastructure from the buffer zone, raised by the Environment Agency. 3. The policy is unclear on how it applies to canals. 4. The policy approach to culverting is overly restrictive. |

Chapter 12: Nature recovery, heritage and landscape

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---------------------------------------|---------------|-------------------|-------------------|-------------------|---|
| General comments on Chapter 12 | 17 | Yes: 3 No: 2 | Yes: 3 No: 1 | Yes: 2 No: 3 | <ol style="list-style-type: none"> 1. Respondents raised concern about the lack of Habitats Regulations Assessment (HRA), particularly with respect to air quality impacts on Oxford Meadows, Cothill Fen and Aston Rowant SACs. 2. Oxford Preservation Trust suggested the need for a specific policy to protect the green setting of Oxford city. 3. There should be a more balanced approach between environmental, social and economic pillars, with some respondents suggesting too much emphasis is put on the environment, although some respondents welcome the ambition to achieve a high-quality environment, and suggested more protection should be given to designated sites. |
| Policy NH1: Biodiversity designations | 48 | Yes: 34 No: 7 | Yes: 31 No: 0 | Yes: 31 No: 1 | <ol style="list-style-type: none"> 1. While there was support for the policy's requirements around lowland fens, some respondents raised concerns that clarity was needed on application. 2. Oxford City Council and Oxfordshire County Council raised concerns about the evidence and application of the policy for Lowland Fens. |
| Policy NH2: Nature recovery | 115 | Yes: 16 No: 77 | Yes: 40 No: 13 | Yes: 44 No: 10 | <ol style="list-style-type: none"> 1. Some respondents raised concerns about the policy's 20% Biodiversity Net Gain (BNG) requirement, which exceeds the national requirement for 10% BNG, citing: <ol style="list-style-type: none"> a. insufficient justification. b. impacts on viability. c. impacts on development delivery. d. lacks flexibility. 2. Some respondents raised concerns about the approach to off-site BNG delivery, questioning whether: |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|-------------------|-------------------|-------------------|---|
| | | | | | <ul style="list-style-type: none"> a. appropriate costs have been viability tested. b. there is a sufficient supply of off-site units within the districts. c. the sequential approach for off-site BNG should consider county/Local Nature Recovery Strategy scale. <p>3. Some respondents raised concerns that the requirements for features to support wildlife do not align with PPG and/or best practice.</p> |
| Policy NH3: Trees and hedgerows in the landscape | 25 | Yes: 15 No: 4 | Yes: 11 No: 0 | Yes: 12 No: 0 | 1. Some respondents raised concern about policy requirements going above and beyond what is required from national policy (to enhance existing trees, woodlands and hedgerows, and provide a net gain in canopy cover). |
| Policy NH4: Chilterns and North Wessex Downs National Landscapes | 45 | Yes: 7 No: 22 | Yes: 21 No: 1 | Yes: 21 No: 1 | <p>1. Concern that the policy does not align with the NPPF (2023) in terms of the setting of National Landscapes, which respondents felt should be considered on a case-by-case basis.</p> <p>2. Some respondents raised potential duplication with NPPF (2023) requirements and suggested additional flexibility in the policy.</p> |
| Policy NH5: District-valued landscapes | 55 | Yes: 14 No: 33 | Yes: 28 No: 1 | Yes: 27 No: 5 | <p>1. Concern that the district-valued landscapes will negatively impact the delivery of development.</p> <p>2. The policy wording differs from national policy and guidance, citing:</p> <ul style="list-style-type: none"> a. it should refer to quality only, not special characteristics and significance. b. the requirement for any valued landscapes to demonstrate a degree of excellence. <p>3. Concern about the robustness of evidence and methodology used in proposing designations, citing:</p> |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--------------------------|---------------|-------------------|-------------------|-------------------|--|
| | | | | | <ul style="list-style-type: none"> a. the requirement for proposals to be proportionate, with some respondents concerned that the designations were too large. b. unclear boundaries and their relationship with Landscape Character Areas. c. differences between local plan and neighbourhood plan valued landscape designations. d. it does not follow the latest guidance. |
| Policy NH6: Landscape | 42 | Yes: 15 No: 17 | Yes: 13 No: 0 | Yes: 13 No: 0 | <ul style="list-style-type: none"> 1. Respondents raised potential duplication of policy requirements and suggested Policy NH6 could be merged with other landscape policies. 2. Concern that the policy requirements regarding visual integration into the landscape are subjective and exceed NPPF (2023) requirements. |
| Policy NH7: Tranquillity | 41 | Yes: 16 No: 20 | Yes: 25 No: 2 | Yes: 26 No: 2 | <ul style="list-style-type: none"> 1. Concerns regarding potential viability issues as a result of additional landscaping and construction costs, which respondents felt hadn't been accounted for in the Viability Assessment. 2. Concern that the policy might restrict development and is subjective, which would be difficult to measure and consider as part of a planning application. 3. The policy wording differs from national policy and guidance, citing the need to explicitly reference recreational and amenity value of tranquil areas. 4. Respondents raised concern that there was not enough detail in the policy on how the Tranquillity Assessment has been undertaken. The Equalities Impact Assessment was considered flawed because it only takes into account those with typical hearing. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|------------------|--------------------------|--------------------------|--|
| Policy NH8: The historic environment | 18 | Yes: 13 No: 1 | Yes: 9 No: 0 | Yes: 9 No: 0 | 1. Concern about alignment with the NPPF (2023), particularly regarding the requirement for development to conserve and enhance significance. |
| Policy NH9: Listed Buildings | 16 | Yes: 11 No: 0 | Yes: 6 No: 0 | Yes: 6 No: 0 | 1. Respondents raised potential duplication of policy requirements and suggested Policy NH9 could be merged with other heritage policies. 2. Respondents suggested that if there are going to be separate policies they should be set out in the order of statutory hierarchy, to enable efficient decision making. |
| Policy NH10: Conservation Areas | 17 | Yes: 11 No: 1 | Yes: 8 No: 0 | Yes: 8 No: 0 | 1. Concern about alignment with the NPPF (2023), particularly regarding part 1(g) and NPPF paragraphs 207 and 208, where the policy does not allow planning balance. 2. Respondents raised potential duplication of policy requirements and suggested Policy NH10 could be merged with other heritage policies. 3. Historic England raised concerns that the requirements are not clearly defined, and it is hard to countenance the “complete loss” of significance of a conservation area, as implied might be possible in Part 3. |
| Policy NH11: Archaeology and Scheduled Monuments | 10 | Yes: 5 No: 1 | Yes: 3 No: 0 | Yes: 3 No: 0 | 1. Concern about alignment with the NPPF (2023) and national policy, particularly regarding: <ul style="list-style-type: none"> a. Historic England raised concerns that the policy fails to respond positively to significance of the heritage and contribute toward repair, maintenance and enhancement of the asset. b. part 1(g) and NPPF paragraphs 207 and 208, where the policy does not allow planning balance. c. part 8, which respondents felt did not align with national policy. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|---------------|------------------|-------------------|-------------------|--|
| | | | | | 2. Concern that Part 9 is too specific and should apply via conditions at the planning application stage. |
| Policy NH12: Historic Battlefields, Registered Parks and Gardens and Historic Landscapes | 8 | Yes: 6 No: 2 | Yes: 4 No: 0 | Yes: 3 No: 1 | <ol style="list-style-type: none"> 1. Concern about alignment with the NPPF (2023) and national policy, particularly regarding: <ol style="list-style-type: none"> a. Historic England raised concerns that the policy fails to respond positively to significance of the heritage and contribute toward repair, maintenance and enhancement of the asset. b. Part 1(g) and NPPF paragraphs 207 and 208, where the policy does not allow planning balance. c. Part 8, which respondents felt did not align with national policy. 2. Concern that Part 9 is too specific and should apply via conditions at the planning application stage. |
| Policy NH13: Historic environment and climate change | 16 | Yes: 12 No: 2 | Yes: 8 No: 0 | Yes: 8 No: 0 | <ol style="list-style-type: none"> 1. Concern about alignment with the NPPF (2023), particularly regarding the policy reference to conserve <u>and</u> enhance, which goes beyond NPPF requirements. 2. Respondents felt Part 1 of the policy is too restrictive and inconsistent with the government's aspiration to increase renewable energy infrastructure both for generation and for storage. 3. Respondents felt the policy does not clearly express specific requirements or methodology. |

Chapter 13: Infrastructure, transport, connectivity and communications

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-------------------|-------------------|-------------------|---|
| General comments on Chapter 13 | 20 | Yes: 2 No: 12 | Yes: 2 No: 0 | Yes: 2 No: 2 | <ol style="list-style-type: none"> 1. Some respondents stated that there is insufficient transport assessment to support the proposed transport policies. 2. Some respondents also identified that there is a specific lack of public transport planning. |
| Policy IN1: Infrastructure and service provision | 66 | Yes: 31 No: 10 | Yes: 26 No: 2 | Yes: 25 No: 2 | <ol style="list-style-type: none"> 1. Cumulative effect of policies in the plan make development unviable, e.g., infrastructure contributions. 2. Some respondents suggested that the policy should make a more explicit reference to the benefit of co-locating development and infrastructure. 3. Some respondents also raised specific concerns about sewage treatment work capacity, and the ability of this policy to secure appropriate mitigation for sewage treatment. 4. Some respondents considered that the policy should place greater emphasis on delivering health infrastructure. 5. Concerns about cross-boundary working on an important infrastructure project which can deliver housing and employment in/around Oxford, and South and Vale (the Cowley Branch Line). 6. Respondents suggested there should be a policy that restricts development until infrastructure (e.g., wastewater treatment works) is funded and agreed. |
| Policy IN2: Sustainable transport and accessibility | 71 | Yes: 30 No: 13 | Yes: 27 No: 2 | Yes: 27 No: 1 | <ol style="list-style-type: none"> 1. Concern was raised that there is: <ol style="list-style-type: none"> a. a lack of evidence to support innovation in transport. b. no plan to achieve modal shift. 2. Some respondents questioned the suitability of travel choice in rural areas. |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|-------------------|--------------------------|--------------------------|--|
| Policy IN3: Transport infrastructure and safeguarding | 77 | Yes: 26 No: 33 | Yes: 26 No: 4 | Yes: 27 No: 6 | <ol style="list-style-type: none"> 1. Respondents raised concerns about the policy, citing: <ol style="list-style-type: none"> a. the lack of strategic plans for the A34 and A4074. b. a lack of evidence in support of the plan. c. the absence of Cowley Branch Line and Third Thames Crossing for Reading in the JLP transport priorities. 2. Some respondents considered that the inclusion of road schemes contradicted with climate change objectives. 3. Concern was raised about specific schemes, including the impact of the South Abingdon Movement Corridor. |
| Policy IN4: Wilts & Berks Canal safeguarding | 8 | Yes: 4 No: 2 | Yes: 4 No: 0 | Yes: 4 No: 0 | <ol style="list-style-type: none"> 1. Wilts & Berks Canal Trust raised concern that the policy is weak and unclear on the nature of support to canal restoration from nearby development and therefore open to varied interpretation. |
| Policy IN5: Cycle and car parking standards | 38 | Yes: 8 No: 11 | Yes: 7 No: 1 | Yes: 7 No: 1 | <ol style="list-style-type: none"> 1. County Council parking standards have not been through examination in public or the same level of scrutiny as a local plan, and some respondents did not feel they should be relied upon. |
| Policy IN6: Deliveries and freight | 4 | Yes: 2 No: 0 | Yes: 2 No: 0 | Yes: 2 No: 0 | No key issues raised. |
| Policy IN7: South East Strategic Reservoir Option (SESRO) safeguarding | 19 | Yes: 8 No: 6 | Yes: 3 No: 2 | Yes: 3 No: 2 | <ol style="list-style-type: none"> 1. Several respondents questioned the need for the reservoir, and Thames Water's ability to demonstrate this need. 2. Some respondents questioned the extent of the safeguarding land, arguing that it covered too large an area. |
| Policy IN8: Digital connectivity | 6 | Yes: 4 No: 0 | Yes: 4 No: 0 | Yes: 4 No: 0 | No key issues raised. |

Chapter 14: Monitoring and review

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--------------------------------|---------------|-----------------|-------------------|-------------------|-----------------------|
| General comments on Chapter 14 | 1 | Yes: 1 No: 0 | Yes: 1 No: 0 | Yes: 1 No: 0 | No key issues raised. |

Chapter 15: Local plan explainer

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--------------------------------|---------------|-----------------|-------------------|-------------------|-----------------------|
| General comments on Chapter 15 | 2 | Yes: 1 No: 0 | Yes: 1 No: 0 | Yes: 1 No: 0 | No key issues raised. |

Joint Local Plan Appendices

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---|---------------|-------------------|-------------------|-------------------|--|
| General comments on Appendix 1: Glossary | 4 | Yes: 1 No: 1 | Yes: 2 No: 0 | Yes: 1 No: 1 | 1. Some respondents disagreed with the definition for some terms provided in the glossary (e.g., Health Infrastructure Provision). |
| General comments on Appendix 2: Strategic status of policies | 3 | Yes: 1 No: 2 | Yes: 1 No: 0 | Yes: 1 No: 1 | No key issues raised. |
| General comments on Appendix 3: Status of previously adopted policies | 146 | Yes: 142 No: 3 | Yes: 39 No: 2 | Yes: 45 No: 2 | 1. Whilst the site promoter of Chalgrove Airfield raised concerns about the deletion of the site allocation, other respondents supported this. |
| General comments on Appendix 4: Housing trajectory | 2 | Yes: 1 No: 0 | Yes: 1 No: 0 | Yes: 1 No: 0 | 1. No key issues were raised against this Appendix directly, but some respondents referenced the housing trajectory in comments against other parts of the plan, citing: |

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|--|----------------------|------------------|--------------------------|--------------------------|--|
| | | | | | <ul style="list-style-type: none"> a. no detailed information on site delivery. b. not enough information on housing trajectory to be able to provide detailed comments. |
| General comments on Appendix 5: Carried forward allocations from previous local plans | 11 | Yes: 1 No: 10 | Yes: 1 No: 0 | Yes: 1 No: 0 | 1. Some respondents queried the deliverability of the “carried forward” allocations. |
| General comments on Appendix 6: Advisory note on seeking marketing and/or viability evidence from applicants | 2 | Yes: 1 No: 0 | Yes: 1 No: 0 | Yes: 1 No: 0 | No key issues raised. |

Policies Map

| Policy | No. responses | Sound | Duty to Cooperate | Legally Compliant | Key issues raised |
|---------------|----------------------|------------------|--------------------------|--------------------------|---|
| Policies Map | 27 | Yes: 3 No: 14 | Yes: 8 No: 2 | Yes: 8 No: 3 | 1. Some respondents disagreed with the boundaries for certain aspects of the policies map (e.g., the Green Belt and site boundaries). |

Key issues raised on other core submission documents

| Document | Key issues raised |
|---------------------------------------|--|
| Sustainability Appraisal (SA) | <ol style="list-style-type: none"> 1. Some respondents queried the assessment of specific sites against the SA framework. 2. Some respondents did not think the SA had appropriately considered alternative options, including: <ol style="list-style-type: none"> a. alternative options for spatial strategy. b. economic growth. c. site selection process – only 43 HELAA sites were selected, but it should have been more. 3. Some respondents were concerned the SA was undertaken late in the process and could not meaningfully inform the plan preparation process. 4. Oxford City Council raised that the SA Scoping Report omitted the assessment of the future state of the environment without implementation of the plan. |
| Habitats Regulations Assessment (HRA) | <ol style="list-style-type: none"> 1. Natural England acknowledged receipt of the draft HRA report and reserved their position regarding the soundness and legal compliance tests in relation to HRA prior to the end of the Regulation 19 publication period. 2. Respondents raised concern that the HRA Appropriate Assessment was not published for Regulation 19. 3. Respondents raised that it is unclear whether the JLP has been informed by an Appropriate Assessment to mitigate the previously identified significant effects on a number of European sites. |
| Infrastructure Delivery Plan (IDP) | <ol style="list-style-type: none"> 1. Respondents raised concerns that they felt some information was missing from the IDP, citing: <ol style="list-style-type: none"> a. the costing of some schemes, which may impact viability. b. Watlington Relief Road. c. Wantage and Grove Railway Station. d. Cowley Branch Line. e. energy, water and sewerage. |
| Local Development Scheme (LDS) | <ol style="list-style-type: none"> 1. Some respondents commented that the timescale for plan examination is overly ambitious and unachievable, therefore the plan period should be extended. |

Key issues on processes relating to the Joint Local Plan

| Process | Key issues raised |
|-------------------|--|
| Duty to Cooperate | <ol style="list-style-type: none"> 1. In relation to Oxfordshire, respondents raised: <ol style="list-style-type: none"> a. concern that there isn't a Statement of Common Ground with other Oxfordshire authorities. b. concern that the JLP doesn't recognise that there is a single Oxfordshire housing market area. c. suggestions that a policy is needed establishing framework for future engagement with Oxfordshire partners. d. that there should be an Oxfordshire wide spatial plan. 2. In relation to Oxford city, respondents raised: <ol style="list-style-type: none"> a. concern about Oxford unmet housing need and other strategic matters relating to Oxford. b. that the JLP defers the issue of new unmet need for Oxford therefore it doesn't effectively address this issue. c. that even if emerging unmet need for Oxford is disputed, it's for South and Vale to pursue the engagement on what those needs might be for the JLP. d. that Oxford have failed the Duty to Co-operate which must mean that South and Vale must have failed too. e. Oxford City Council claim to have not been directly engaged on relevant JLP matters and also disagree with the strategic matters identified by South and Vale. f. Cherwell District Council re-iterated the importance of sites which are needed to continue to meet Oxford unmet need. g. that the Duty to Co-operate should extend to working together to continue to protect views, the city's green setting and established view cones. 3. There are claims that the councils are unable to demonstrate that they have engaged appropriately on Reading's unmet housing needs. 4. There are claims that the councils are unable to demonstrate that they engaged with Oxfordshire County Council, Swindon Borough Council, Reading Borough Council or Wokingham District Council as Local Highways and Transport Authorities, or National Highways in respect of strategic matters regarding transport infrastructure, services and connectivity. 5. It was suggested that other local plans close-by will need to consider a higher housing need from the new Standard Method calculations, therefore the JLP should wait to see if those local plans will have housing needs which could be accommodated in South and Vale. |

| Process | Key issues raised |
|------------------|---|
| | <ol style="list-style-type: none"> 6. Concern generally that there is an absence of Statements of Common Ground with the Regulation 19 JLP, and this must mean the Duty isn't complied with. 7. Concern that parish councils are not informed of the outcomes of districts meetings. 8. Concern that there are unresolved issues and a lack of engagement with all neighbouring authorities referenced. 9. Concern that the DTC statement itself doesn't explain how issues have been effectively resolved or concluded. 10. Concern that there are major strategic cross-boundary issues relating to transport and mobility that require proper engagement which hasn't taken place. |
| Legal Compliance | <ol style="list-style-type: none"> 1. Some respondents raised concern stating they felt the plan was not legally compliant, citing: <ol style="list-style-type: none"> a. the plan is not consistent with national policy. b. the updated Local Development Scheme and timescales for submission, noting the potential implications associated with the emerging NPPF. c. the consultation process, which they felt did not align with the requirements of the Statement of Community Involvement. d. the lack of HRA Appropriate Assessment and/or challenges of the Sustainability Appraisal process. e. the council has not met their Duty to Cooperate requirements. |
| HELAA | <ol style="list-style-type: none"> 1. Many developers and site promoters provided promotions of alternative and/or additional sites for allocation. 2. Some respondents disagreed with the assessment and/or summaries of their sites and suggested amendments. 3. Some respondent commented that some HELAA assessments from January 2024 differed from the latest version, with no explanation why. 4. Oxford City Council stated that for some site allocations the housing numbers in the allocation policies differ with the HELAA's capacity assessment. They also stated that the HELAA identifies indicative 'lead in times' with no explanation about when this is counted from, and that the assessment of delivery times is not appropriate where site-specific information is known. 5. Some respondents raised concerns about a lack of engagement with site promoters. 6. Some commented that there is no trajectory, though two HELAA documents indicated there would be, to suggest when and how sites will deliver new housing. 7. Respondents raised concerns that the HELAA overstated sites' capacities, leading to the risk that the total housing supply may not meet actual needs. 8. Many respondents commented on the site selection process, citing that: <ol style="list-style-type: none"> a. many sites should have been considered further. |

| Process | Key issues raised |
|---------|---|
| | <ul style="list-style-type: none"><li data-bbox="562 236 2085 304">b. there were concerns with the relationship between the HELAA, SA process and the Site Selection Topic Paper.<li data-bbox="562 309 2002 341">c. alternative sites had been discounted arbitrarily between the HELAA and site selection processes. |

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South Oxfordshire and Vale of White Horse
Joint Local Plan 2041



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