





Listening Learning Leading



South and Vale Joint Local Plan 2041

Statement of Common Ground

between

South Oxfordshire and Vale of White Horse District Council

and

Historic England

in relation to the South and Vale Joint Local Plan 2041

December 2024

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared by South Oxfordshire District Council and Vale of White Horse District Council ("the Council") and Historic England ("HE") hereafter referred to as "the parties". It sets out matters that are agreed and those that are not between the parties in relation to the South and Vale Local Plan 2041 ("the Plan").
- 1.2 The agreed matters in this SoCG do not preclude any further written or verbal representations HE may wish to make as part of the Local Plan Examination, in relation to any other matters which may not have been agreed and/or which do not form part of this SoCG.
- 1.3 To date, the Council has consulted on:
 - Joint Local Plan (JLP) at Regulation 18 Part 1 stage (June 2022)
 - Regulation 18 Part 2 stage (Jan 2024) and
 - the publication draft of the Joint Local Plan through Regulation 19 (Oct 2024).
- 1.4 As set out in South and Vale JLP Duty to Co-operate Statement¹, South and Vale and HE have co-operated constructively, actively and on an on-going basis during the JLP's production. The Council and Historic England support and recognise the value of this on-going working relationship for positive plan-making.

2. Geographies and Issues

South and Vale

2.1 The district of South Oxfordshire covers nearly 670km² and the Vale covers an area of some 580km². The district boundaries of South Oxfordshire reach from the edge of the city of Oxford to the north-west, along the borders of Buckinghamshire and Berkshire to the outskirts of Reading and Wokingham to the south. The Vale of White Horse district falls between the larger centres of Oxford to the north-east and Swindon to the south-west. South Oxfordshire has four main towns: Didcot, Henley-on-Thames, Thame and Wallingford. The main settlements within the Vale are the three historic market towns of Abingdon-on-Thames, Faringdon and Wantage.

2.2 South and Vale have an extremely rich and varied historic environment. It encompasses landscapes, water bodies, parks and open spaces, buildings, urban spaces and the features within them, along with archaeological remains both buried and above ground. The historic environment encapsulates the social and cultural history of South and Vale, its communities and people. This is reflected in the physical fabric of places, the values that people ascribe to them and the traditions and memories associated with them.

¹ Joint Local <u>Duty to Cooperate Scoping Document</u> (May 2022); South and Vale <u>Interim Duty to Cooperate Statement Reg 18</u> (Jan 2024); South and Vale <u>Duty to Cooperate Statement Reg 19</u> (Oct 2024)

- 2.3 The Districts are host to a wide range of heritage assets, including approximately 5,500 Listed Buildings, 123 designated conservation areas, 128 Scheduled Monuments, one historic battlefield, 20 Registered Parks and Gardens and a large number of non-designated heritage assets.
- 2.4 South Oxfordshire and Vale of White Horse district councils are working together on a Joint Local Plan. In the Plan the Council proposes developing planning policies that help address the climate emergency, restore nature, and meet the needs of our residents, such as delivering genuinely affordable low-carbon homes with the right infrastructure to go with it.

Historic England

- 2.5 Historic England is a Prescribed Body as defined in defined in part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. They are a public body "that helps people care for enjoy and celebrate England's spectacular historic environment". Historic England are an expert advisor to the Government and a public body that helps people care for, enjoy and celebrate England's historic environment by:
 - Championing historic places;
 - Identifying and protecting our heritage;
 - Supporting change;
 - Understanding historic places;
 - Providing expertise at the local level.

3. Engagement

- 3.1 The parties agree that the JLP recognises the importance of the historic environment and takes a character-led approach to managing development.
- 3.2 The parties agree that heritage effects associated with the JLP's site allocations are mostly limited to localised impacts on the setting of some heritage features. Where relevant the JLP requires Heritage Statements, Heritage Impact Assessments and archaeological desk-based assessments to be prepared for any planning application coming forward on the sites with the potential to harm the significance of heritage assets and a suitable mitigation scheme devised if harm is predicted.
- 3.3 The parties agree that Policies NH8 to NH13 provide for the protection and enhancement of all heritage assets in the Districts. Policy DE1 also requires high quality design which responds to the history of a site and conserves and enhances historic character. The potential for short-term and long-term minor heritage effects does exist. Any negative effects are mitigated through policy provisions and through sensitive, high-quality design informed by a Heritage Statement. Also, the plan provides support for identifying heritage benefits, which forms an important part of a positive strategy for the historic environment.

- 3.4 Whilst being broadly supportive, Historic England's representations on the Regulation 18 consultation raised concerns about specific site allocation proposals with significant heritage interests, such as Dalton Barracks; overall town strategies, detailed heritage policies. Principally these concerns relate to matters of wording, though in the case of a select few proposed sites this also connected with their underlying evidence base. In response to this feedback, the Councils have prepared and published the Heritage Impact Assessment (HIA) for Dalton Barracks and Bayswater Brook sites which are published alongside the Regulation 18 (2) version of the JLP. Although the Crowmarsh Gifford site is no longer promoted as an allocation, as an alternative site there is also a Heritage Impact Assessment prepared which will be published with the submission of the Joint Local Plan. Historic England's representations on the Regulation 19 consultation no longer raise this as an issue. The parties therefore agree that the HIAs are a sufficiently robust evidence base to support the site allocations in the Proposed Submission version of the Joint Local Plan.
- 3.5 A number of policies have been amended in response to Historic England's comments at Reg 18 stage including those that have cross-over with Heritage policies (NH8-NH13). For example, a bespoke policy NH13 was introduced to strengthen the links between the historic environment and climate change. Minor changes were made after Regulation 18 consultation to strengthen the policy in response to the comments from HE, particularly in areas of retrofitting, reuse of materials and traditional construction methods, including ensuring there are no unhelpful generalisations. 'Historic England welcomes the plan's references to embodied carbon. Reference has been included within the supporting text to highlight the importance of 'whole building approach'.
- 3.6 Historic England's representations on the Regulation 19 consultation broadly support the Joint Local Plan and acknowledge that it provides an effective framework for managing the effects of new development on the historic environment, but also make a number of suggestions to amend the Plan. In particular, HE:
 - Object to Policy SP8 A strategy for Wallingford suggesting that it risks being unsound, because it does not encourage measures to address the needs of major Scheduled Monuments at risk in the heart of the town.
 - Were concerned that policies SP3-SP9 should be improved by referring to the significance of assets, rather than risk focusing solely on their fabric, although raise no soundness issues. Modifications have been suggested within CSD01.1 Joint Local Plan 2041 Schedule of proposed modifications for submission (December 2024). These amend reference to heritage assets in Policies SP3 to SP8 "conserve and enhance <u>the significance of</u> the town's heritage assets...". HE supports these modifications;
 - Recommend further enhancements and clarifications to various other policies to strengthen them and to bring clarity, but raise no soundness issues. Of these, HE highlight minor changes to: AS10: Land at Dalton Barracks Garden Village, Shippon (need to refer explicitly to a requirement for HIA and archaeological investigation), AS14 Dalton Barracks Garden Village (ensure the role of the site's aviation heritage is recognised in the policy's approach to place-shaping), DE1: High quality design (a fabric first approach to energy and carbon efficiency is not appropriate for heritage buildings), Policy NH11 Archaeology and Scheduled Monuments (add criterion that supports tackling heritage at risk, given most of the

designated heritage assets in the Districts on the Heritage at Risk Register are Scheduled Monuments).

- 3.7 The full set of comments made by Historic England is set out in Appendix 1.
- 3.8 Where modifications are not suggested, South and Vale state that they do not consider that these are soundness concerns for the JLP preventing the submission of the plan for examination.

4. Record of Agreement and point on which agreement has yet to be reached

- 4.1 Generally, both parties are in agreement that the JLP:
 - acknowledges the importance of future growth being heritage-led (the extent to which this is relevant will vary from place to place);
 - provides detail on heritage across a broad range of relevant policy areas; and
 - has sound evidence base supporting the Plan, including the Heritage Impact Assessments for the two relevant allocated sites, and it provides relevant guidance for the Plan.
- 4.2 HE has submitted a Regulation 19 response to the JLP where they make a case for a number of modifications required to make policies sound and to clarify certain matters or add relevant detail. This representation is attached as Appendix 1. The Council notes and welcomes the general comments and edits offered by Historic England in relation to policies and supporting text. Whilst South and Vale believe that many of the suggestions are not soundness concerns, a view shared by Historic England, there are helpful modifications which improve the readability of the JLP. The Inspector examining the JLP will take a view as to the soundness of the JLP in light of the representation from HE.
- 4.3 Within its response at Regulation 19 and its proposed changes, HE asserts that the plan provides inadequate support regarding Scheduled Monuments at risk, especially those in Wallingford. HE has suggested related changes to both policies SP8 and NH11 and considers the plan's silence on Scheduled Monuments at risk in Wallingford to be a matter of soundness. HE and the Council will continue to discuss this.

5. Duty to Cooperate and Engagement

- As set out in South and Vale JLP Duty to Co-operate Statement², South and Vale and HE have co-operated constructively, actively and on an on-going basis during the JLP's production. The Council supports and recognises the value of this on-going working relationship for positively prepared local plans.
- 5.2 Officers at HE have worked with colleagues at the District Councils in developing and advising on policy approaches and draft policy wording for this Regulation 19 stage. A

² Joint Local <u>Duty to Cooperate Scoping Document</u> (May 2022); South and Vale <u>Interim Duty to Cooperate Statement Reg 18</u> (Jan 2024); South and Vale <u>Duty to Cooperate Statement Reg 19</u> (Oct 2024)

significant amount of informal officer input has been captured in the supporting wording, policy approaches and draft policy wording.

- 5.3 Records of engagements which relate to the JLP have been recorded in the South and Vale Duty to Co-operate Statement.
- 5.4 The parties agree that the Council has discharged its Duty to Cooperate.

6. Governance agreements

This SoCG will be reviewed and updated as required, so that it reflects the most upto-date position in terms of joint working.

Signatures

Signed:



Tim Oruye

Head of Policy and Programmes

South Oxfordshire District Council and Vale of White Horse District Council

Signed:



Name: Guy Robinson

Historic Environment Planning Adviser

Historic England

Appendix 1

Page	Section	Sound/ Unsound	Comments	Suggested Change
27	Vision	Sound		
28 / 29	Objectives	Sound		
31	Paragraph 4.6	Comment	The historic environment should be acknowledged in this context.	" Improvements to the quality of our environment will have far reaching benefits to human health, well-being, biodiversity, as well as our built, historic and natural environments."
42-44	Policy CE3 – Reducing embodied carbon	Sound		
45	Policy CE4 – Sustainable retrofitting	Sound		
47 - 50	Policy CE5 – Renewable energy	Sound		
51	Paragraph 4.38	Comment	We suggest adding reference to heritage impact assessment as a helpful tool to inform decision-making, and we highlight that heritage impact assessment and landscape and visual impact assessments are related but separate studies. We suggest wording for consideration, while acknowledging more detailed wording could be added in various ways.	"To aid this assessment, applicants are required to provide detailed information to demonstrate that no significant adverse impacts will arise as a result of the renewable energy development that cannot be mitigated and reversed at the end of life of the development. This includes cumulative and cross-boundary impacts. Heritage impact assessment is used to assess the potential impacts of development on the significance of heritage assets (including setting). Impacts on townscape, landscape, views and visual amenity are assessed according to Guidelines for Landscape and Visual Impact Assessment, which does not focus on heritage significance but does emphasise the need for collaboration between heritage and landscape experts to ensure that heritage is properly considered."
63 - 65	Policy CE10 – Pollution sources and receptors	Sound		
77 - 78	Policy SP1 – Spatial strategy	Comment	As stated in our response at Regulation 18, this policy would benefit from reference to the historic environment, especially in criterion 4.	"At the Garden Communities of Didcot, Berinsfield and Dalton Barracks we will support housing and some economic development to achieve holistically planned new or regenerated settlements which enhance the natural and historic

Page	Section	Sound/ Unsound	Comments	Suggested Change
				environment, tackles climate change and provide high quality affordable housing and locally accessible jobs in beautiful, healthy and sociable communities."
88 - 92	Policy SP3 – The strategy for Didcot Garden Town	Comment	In our response at Regulation 18, we suggested making explicit reference to setting. Alternatively, one could refer to the significance of heritage assets, which covers both the fabric and its setting. Without such language, there is a risk that this policy provision could be narrowly applied only to the fabric of the assets.	"Heritage - Within the Garden Town Masterplan area and the Area of Influence we will conserve and enhance the significance of heritage assets, both designated and non-designated. This includes the Scheduled Monuments of the settlement sites north of Milton Park and east of Appleford and any archaeological remains and historic landscapes and/or landscape features identified in the Oxfordshire Historic Environment Record, the Oxfordshire Historic Landscape Character Assessment, other sources and/or through further investigation and assessment."
94 - 95	Policy SP4 – A strategy for Abingdon-on- Thames	Comment	In common with SP3, we recommend referring to the significance of assets, rather than risk focusing solely on their fabric. As stated in our response at Regulation 18, we are concerned that criterion i) could be misinterpreted. While it could mean "including, but not limited to" the assets specified, it does not state this explicitly. So, conceivably the policy would not seek to conserve and enhance buildings of local significance, a type of non-designated heritage asset. This is potentially in conflict with paragraph 195 of the NPPF. Even if this is not intended, minor changes would remove this potential issue. We suggest this would be beneficial, integrating wording in the Planning (Conservation Areas and Listed Buildings) Act 1990.	"conserve and enhance the significance of the town's heritage assets including the medieval street pattern, numerous timber-framed buildings, monuments and major historic or landmark buildings or any features of special architectural or historic interest which they possess of more than local significance as well as the focal point of the River Thames; and"
96 - 97	Policy SP5 – A strategy for Faringdon	Comment	In common with SP3 and SP4, we advise referring to the significance of assets, rather than risk focusing solely on their fabric.	"e) conserve and enhance the <u>significance of the</u> town's heritage assets including the medieval street pattern;"
98 - 99	Policy SP6 – A strategy for	Comment	In common with SP3-SP5, we recommend referring to the significance of assets, rather than risk focusing solely on their fabric.	"conserve and enhance the <u>significance of the</u> town's heritage assets including <u>its</u> Registered Parks and Gardens, a focal point of the town along the River Thames, and the three Conservation Areas;"

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Henley-on- Thames		Noting their proximity, we recommend referring to the Registered Parks Gardens within or adjacent to the town. Also, we recommend referring in the supporting text to the Council's recent work on the Conservation Area Appraisal (CAA) for Henley-on-Thames, which we note includes helpful detail on topics such as detracting features, public realm, and advice on making changes to existing buildings and new development.	
100 - 101	Policy SP7 – A strategy for Thame	Comment	In common with SP3-SP6, we recommend referring to the significance of assets, rather than risk focusing solely on their fabric. We note that the Conservation Area Appraisal and Management Plan for Thame may need to be updated.	"conserve and enhance the <u>significance of the</u> town's heritage assets including the Thame Conservation Area;"
102 / 103	Policy SP8 – A strategy for Wallingford	Object	In common with SP3-SP7, we recommend referring to the significance of assets, rather than risk focusing solely on their fabric. We flagged in our response at Regulation 18 concerns about Heritage at Risk and the opportunity for focused consideration in the town-based strategies. This is particularly important for Wallingford. While we welcome reference to the Scheduled Monuments in SP8, the policy and its supporting text are both silent on the challenges facing these assets on the national Heritage at Risk Register. This is a significant omission, which risks failing to deliver a positive strategy for these Monuments as required by national policy. Further detail could usefully be included in the supporting text of what is needed.	"conserve and enhance the significance of the town's heritage assets including Wallingford Conservation Area and the Scheduled Monuments of Wallingford Castle, Kinecroft and Bullcroft. Measures are encouraged that directly address the needs of the two Monuments on Historic England's Heritage at Risk Register, seeking to reduce the risk to those Monuments and enhance their appreciation." In the supporting text, to be expanded or adapted as appropriate: "For Wallingford Castle, works are needed to manage the woodland on the Motte to safely re-open it to the public. Works are needed to upgrade the north west entrance to the Bullcroft and clear scrub for Bullcroft and Kinecroft to protect the integrity of the earthworks."

Page	Section	Sound/ Unsound	Comments	Suggested Change
104 / 105	Policy SP9 – A strategy for Wantage	Comment	In common with SP3-SP8, we recommend referring to the significance of assets, rather than risk focusing solely on their fabric. We suggest a minor change to the text on the town's heritage and highlight the need for a Conservation Area Appraisal and	"conserve and enhance the significance of the town's heritage assets including the conservation areas in Wantage Town Centre (particularly the historic Market Place and adjacent assets), and at Charlton; and
			Management Plan for Wantage. Would the Council consider committing to the preparation of a Conservation Area Appraisal in its section on Wantage?	
133	Policy HOU9 — Sub- division of houses	Comment	As stated in our response at Regulation18, we encourage the addition of a criterion that refers to the significance of the asset.	"d) the proposal responds sensitively to the heritage significance of the building."
145 - 147	Policy HOU16 – Residential extensions and annexes	Comment	As stated in our response at Regulation 18, we consider the policy would ideally refer to heritage significance. We suggest alternative wording for consideration.	"1 a) the size, scale, location and design of the extension or ancillary building is subordinate to the original dwelling, responds sensitively to its heritage significance and is appropriate to the character and appearance of the surrounding area;" "2 d) the size, scale, location and design of the annex is appropriate, responds sensitively to the heritage significance of the existing dwelling and is subordinate to the existing dwelling and appropriate to the character and appearance of the surrounding area."
165 - 167	Policy JT5 – Supporting the rural economy	Comment	We maintain it would be helpful to refer to heritage significance, as stated in our response at Regulation 18.	"1a) it respects the landscape character, <u>heritage significance</u> , visual quality, biodiversity and tranquillity of the countryside, particularly within the National Landscapes (formerly AONBs);
176 - 178	Policy LS1 – Proposals for large scale major development	Sound		

Page	Section	Sound/ Unsound	Comments	Suggested Change
179 - 182	Policy AS1 – Land at Berinsfield Garden Village	Sound		
186 - 189	Policy AS2 – Land adjacent to Culham Campus	Sound		
193 - 196	Policy AS3 – Land South of Grenoble Road, Edge of Oxford and its supporting text	Comment	archaeological adviser.	ext on the archaeological potential of the area, informed by liaison with the Council's
204 - 207	Policy AS5 – Land at Bayswater Brook, Edge of Oxford	Comment	We welcome the commitment to repair the Grade II* Wick Farm Wellhouse. That said, might the supporting text refer to the need for a landscape buffer to the listed boundary stone mentioned in the recent Heritage Impact Assessment? It would seem a missed opportunity not to embed the outcome from that assessment.	
210 - 212	Policy AS6 – Rich's Sidings and Broadway, Didcot	Sound		
215- 216	Policy AS7 – Land at Didcot Gateway, Didcot	Sound		
229 - 232	Policy AS10 – Land at Dalton	Comment	The Heritage Impact Assessment (HIA) prompts the need for further heritage assessment. To a degree this is covered by	In the policy:

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Barracks Garden Village, Shippon and Figure 8.10	Onsound	the requirements of policy LS3. However, we assert it would be beneficial to build on the existing, recent assessment. We query if the concept plan in Figure 8.10 fully takes on board the recommendation in the HIA for green infrastructure along the southern edge of the site to conserve the setting of the listed buildings in Shippon. Also, the HIA states that there is "high potential for archaeological remains of significance to be identified during development of the site". That being so, notwithstanding that policy LS1 requires an archaeological desk-based assessment, we would expect either the policy or supporting text for this allocation to refer to this high potential. We suggest revised wording and recommend liaison with the Council's	2 "h) that existing buildings and monuments, where possible, are retained and reused to give context and interest to the site, particularly where these are of heritage significance. Heritage impact assessment is needed to inform the approach taken to the retention and sensitive adaptation of historic buildings and structures, taking account of the work already undertaken by the Council and the need for further assessment of the significance and condition of assets;" In the policy or supporting text: "Archaeological investigation, starting with desk-based assessment, will be needed to identify the presence and significance of as yet unknown archaeological remains across the site, taking account of the geophysics survey already undertaken. The scheme design must respond sensitively to the site's archaeological remains."
235 - 236	Policy AS11 – Culham	Sound	archaeological adviser.	
239 / 240	Campus Policy AS12 - Harwell Campus	Sound		
248	Policy AS14 - Dalton Barracks Garden Village and its supporting text	Comment	Currently there is little explicit attention focused on the site's former land use and historic character. It is implied but would be much clearer if this were made explicit in supporting of effective place-shaping. Also, we suggest ways in which the area's heritage could be integrated into the supporting text.	In the policy: "c) a strong sense of place, rooted in its military and aviation heritage, with an attention to detail and high quality." In the supporting text: "Protect the environment and respond to climate change: • delivering a green, landscape-led new community

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272 - 276	Policy DE1 – High quality design	Comment	A fabric first approach is not appropriate for traditionally constructed buildings. As stated in our published guidance (for example: https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/improving-energy-efficiency-through-mitigation/): "In a historic building, this [a fabric first approach] is often neither practicable nor desirable." While the implication is that this policy focuses on new development and CE1 explicitly refers to new development, we note DE1 refers to "All development". This contrasts with policy DE2, which specifies "new" in its wording, and policy DE3, which includes "new" in its title.	securing net gains in biodiversity and delivering significant areas of combined green and blue infrastructure incorporating sustainable design and construction that seeks to deliver net zero operational carbon responding positively to the site's archaeological remains landscaping that buffers the development from designated wildlife sites and helps to protect the rural approaches to listed buildings Deliver high quality and sustainable design: incorporating Garden Village principles into the design and layout seeking net zero operational carbon using high quality, robust and sustainable materials with the highest levels of fabric energy efficiency and lowest levels of embodied carbon optimising renewable energy and smart technology maximising water efficiency aligning design with important views to and from the surrounding area developing a new village community with its own character which has a synergy with the existing communities in the surrounding area and connects with the area's military and aviation history and associated heritage assets." 6 "b) minimises energy consumption and carbon emissions (utilising a "fabric first" design approach for new development in accordance with Policy CE1 (Sustainable design and construction)), and achieves an on site net zero energy balance for new buildings in accordance with Policy CE2 (Net zero carbon buildings);"

Page	Section	Sound/ Unsound	Comments	Suggested Change
			To avoid the chance of DE1 being misinterpreted, we recommend referring to new development in criterion 6b.	
			Also, cross reference could be made to paragraph 12.64 in the supporting text.	
278 - 279	Policy DE2 – Local character and identity	Sound		
280 - 283	Policy DE3 – Delivering well- designed new development	Sound		
284 / 285	Policy DE4 – Optimising densities	Sound		
292	Paragraph 11.2	Comment		"The built, historic and natural environment has an impact on the physical health and wellbeing of our residents"
333	Policy NH5 – District- valued landscapes	Sound		
338 - 340	Policy NH8 – The historic environment	Sound		
341 / 342	Policy NH9 – Listed Buildings	Sound		
343 / 344	Policy NH10	Comment	We retain a concern expressed in our respor of a conservation area, as implied might be p	ise at Regulation 18 that it is hard to countenance the "complete loss" of significance ossible in criterion 3.

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Conservation Areas	Silosuna		
345 / 346	Policy NH11 - Archaeology and Scheduled Monuments	Comment	In South Oxfordshire, 9 of the 14 designated heritage assets currently on the national Heritage at Risk Register are Scheduled Monuments. In the Vale of White Horse, 4 of the 6 assets on the Register are Scheduled Monuments. Set in that context, policy NH11 would benefit from a policy criterion being added that supports tackling this issue. We suggest wording for consideration.	"Development must protect the site and setting of Scheduled Monuments and nationally important non-designated archaeological remains. In cases where the Scheduled Monument is identified on Historic England's Heritage at Risk Register, and development has the potential to affect the significance of the asset, proposals will be required to respond positively to that significance and, where necessary, contribute towards the repair, maintenance and enhancement of the asset."
347	Policy NH12 – Historic Battlefields, Registered Parks and Gardens and Historic Landscapes	Sound	J	
349	Policy NH13 – Historic environment and climate change	Sound		
366 / 367	Policy IN4 – Wilts and Berks Canal safeguarding	Sound		
373 - 376	Policy IN7 – South East Strategic Reservoir Option	Sound		

Page	Section	Sound/ Unsound	Comments	Suggested Change
	(SESRO) safeguarding			