

SUPPORTING DOCUMENT

**PREFERRED OPTIONS
CONSULTATION STATEMENT**

Joint Local Plan

Pre-submission Publication Version

(Regulation 19)



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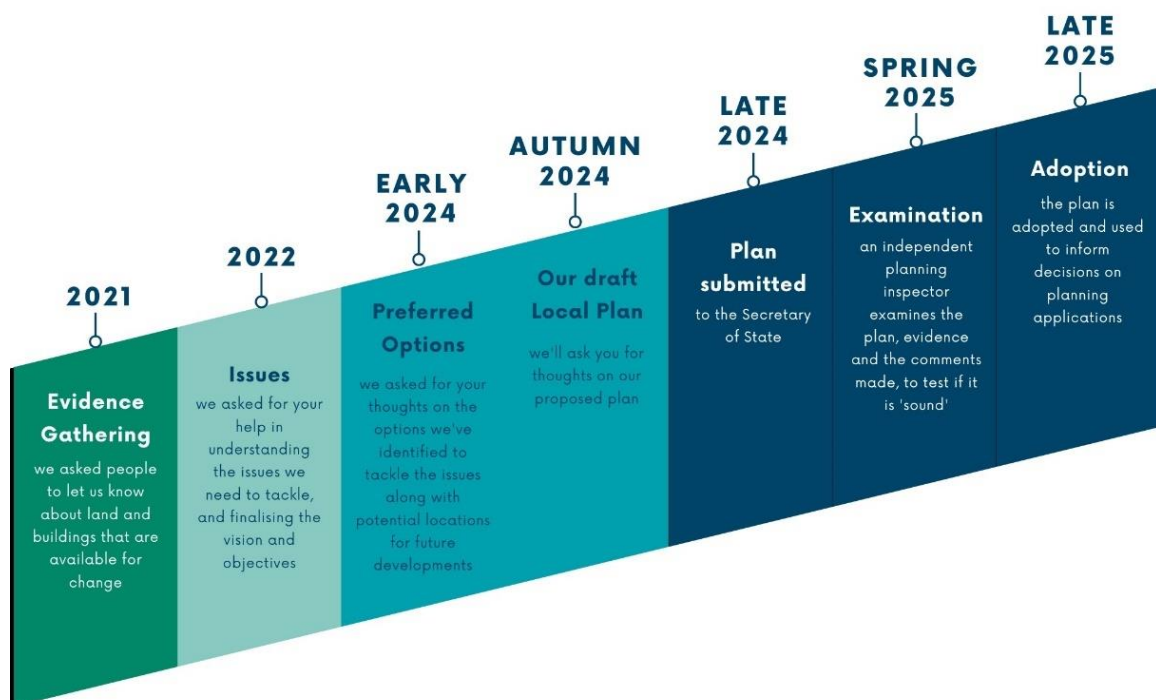
Introduction

This Consultation Statement outlines the consultation and engagement activities that we undertook during the Preferred Options Consultation for the Joint Local Plan, summarises the main issues raised through representations, and outlines how these have been taken into account in the preparation of the publication version of the Joint Local Plan.

Background

South Oxfordshire and Vale of White Horse District Councils are working together on a Joint Local Plan which will guide the kinds of new housing and jobs needed and where they should go. Once adopted, the Joint Local Plan 2041 will replace the South Oxfordshire Local Plan 2035 and Vale of White Horse Local Plan 2031 and be used to determine planning applications in the two districts.

The preparation of the Joint Local Plan must follow the process as set out in [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) (“the Regulations”). This process involves a series of stages as summarised in the graphic below:



South Oxfordshire and Vale of White Horse District Councils undertook an initial “Issues Consultation” between 12 May and 23 June 2022 during which we sought thoughts on the main issues facing our districts and how we could use the Joint Local Plan to address them.

We analysed the responses to the Issues Consultation and published the results via updates to our [interactive Issues Consultation website](#). We also produced a detailed [Joint Local Plan Issues Consultation Results](#) document which summarises the

responses received during the consultation and outlines actions we propose to take in response.

Preferred Options Consultation

Between 10 January and 26 February 2024, we asked for views on preferred policy options and draft policies in our Joint Local Plan “Preferred Options Consultation”.

We produced an [interactive online platform](#) where people could browse through the different chapters of the Joint Local Plan to discover the different policy options, read our draft policies. The website also hosted our emerging Policies Map and draft Supporting Documents, such as the Sustainability Appraisal. We also produced a [PDF version](#) of the Joint Local Plan Preferred Options content for those who preferred a more traditional format.

The Regulations require us to produce a statement which includes the following details of the Joint Local Plan Preferred Options Consultation:

- Who has been consulted?
- How were they consulted?
- A summary of the main issues raised
- How the issues raised have been taken into account

This is what this Consultation Statement does. In terms of structure, the first two questions are addressed in Section 1: Engagement Methods. The second two questions are addressed through Section 2: Consultation Responses, which provides a detailed chapter by chapter summary of the results of the consultation. We have also included appendices showing the consultation materials and methods we used.

Awards

We’ve set out to be innovative, inclusive and pro-active in how we have approached engaging with the public and stakeholders on our Joint Local Plan. We have done more innovative and active community consultation than ever before, which has brought us recognition through national awards. Our work on the Issues consultation was shortlisted in the Local Government Chronicle awards 2023 in the digital impact category, and we received a Highly Commended accolade in the Planning Resource 2024 awards in the stakeholder engagement in planning category.



Section 1: Engagement Methods

Who did we consult and how did we consult?

In accordance with our [Statement of Community Involvement](#) and the Regulations, we consulted with general consultation bodies who may be interested in the Joint Local Plan, specific consultation bodies described in legislation, and residents and businesses within the area.

The statutory consultees, organisations and groups have been set out in Appendix A.



The Preferred Options Consultation period ran from Wednesday 10 January to Monday 26 February 2024.



We sent 6,257 email notifications to:

- Statutory consultees, including businesses/organisations, neighbouring councils, voluntary bodies, different racial, ethnic or national groups and bodies which represent the interests of disabled persons
- Individuals, organisations and groups who have asked to be on the councils' consultation database
- Town and Parish Councils
- District Councillors

We also sent an email notification to the councils' Equalities Officer, Economic Development Officer and Community Safety Officer who forwarded the notification to groups that may have had an interest in the consultation.

Examples of the email notifications are shown in Appendix B.



We sent letters to 330 consultees registered on the councils' consultation database.

The letter notification can be found in Appendix C.



We issued a press release and posted social media messages to Facebook and X (formerly Twitter) during the engagement period to further publicise and encourage participation from the public.

Samples of these messages can be found in Appendix D.



We sent posters (shown in Appendix E) and paper copies of the documents to various deposit locations in the districts, as listed in the table below.

Deposit locations in South Oxfordshire

- Benson Library
- Berinsfield Library
- Goring Library
- Henley on Thames Library
- Sonning Common Library
- Thame Library
- Wallingford Library
- Watlington Library
- Woodcote Library

Deposit locations in Vale of White Horse

- The Beacon
- Cornerstone Arts Centre
- Great Wester Park District Neighbourhood Community Centre
- Abbey House (South Oxfordshire and Vale of White Horse District Councils Offices)
- Didcot Library
- Botley Library
- Faringdon Library
- Grove Library
- Kennington Library
- Wantage Library
- Abingdon Library

Consultation Events

Drop-in events

We held ten drop-in consultation events during January and February 2024. We also provided an interactive [virtual exhibition](#) as well as an [accessible version](#) of the exhibition (if you are on a mobile please use the link to the accessible version). The exhibition boards are also available to view in Appendix F.

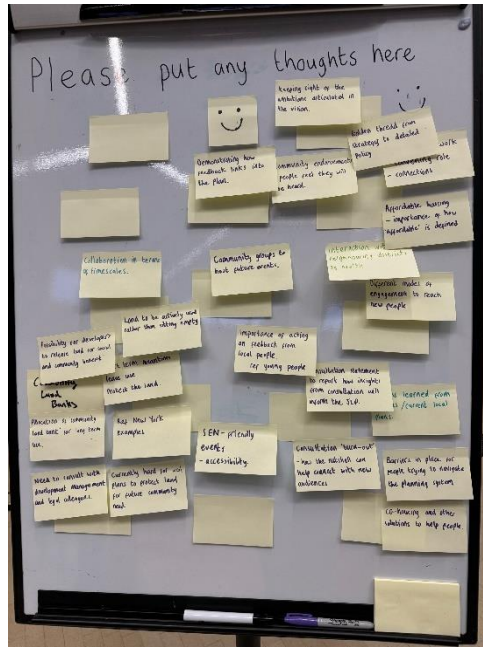


Location	Date	Time	Venue	Number of attendees
Sandford-on-Thames	Saturday 20 January 2024	1pm – 4pm	Sandford Village Hall, Henley Rd, OX4 4YN	3

Shippon	Wednesday 24 January 2024	3pm – 8pm	Shippon Village Hall, Barrow Rd, opposite Prince of Wales pub, OX13 6JQ	44
Wallingford	Thursday 25 January 2024	3pm – 8pm	Centre 70, Wallingford Community Association Hall, off Kinecroft, Goldsmiths Ln, OX10 0DT	57
Henley-on- Thames	Saturday 27 January 2024	11am – 4pm	Henley Town Hall, Market Pl, Henley RG9 2AG	47
Thame	Tuesday 30 January 2024	11am – 4pm	Candelo Lounge, 102 High St, Thame, OX9 3DU	76
Wantage	Wednesday 31 January 2024	11am – 4pm	The Beacon, Community Centre, Portway, Wantage OX12 9BX	38
Abingdon	Saturday 3 February 2024	11am – 4pm	Pablo Lounge, Abbey Shopping Centre, 1-3 Bury Street, Abingdon, OX14 3QY	88
Crowmarsh	Monday 5 February 2024	11am – 4pm	Crowmarsh Pavilion, Recreation Ground, Bellamy Way, Crowmarsh Gifford, OX10 8FN	95
Faringdon	Tuesday 6 February 2024	11am – 1:30pm 1:30pm – 4pm	Faringdon Town Council, The Pump House, 5 Market Place, Faringdon SN7 7HL The Old Crown Coaching Inn, 25 Market Place, Faringdon SN7 7HU	56
Didcot	Saturday 10 February 2024	11am – 4pm	Berro Lounge, Orchard Shopping Centre, 44 Orchard St, Didcot, OX11 7LG	78

Didcot Civic Hall community event

On Thursday 8 February 2024, we held an informal event at Didcot Civic Hall geared towards local disability groups, faith groups, and marginalised communities, tailored for those who may not be familiar with the local plan process, to provide an opportunity to discuss the Joint Local Plan. We employed a British Sign Language interpreter to sign at the event so that all the presentations, workshops and question and answer sessions allowed communication between deaf sign language users and hearing people.



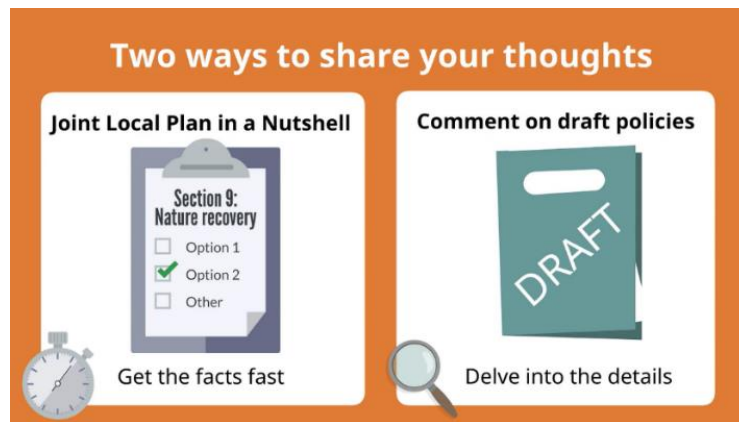
School events

We ran two in-person sessions for students at Abingdon and Witney College and Didcot UTC in February 2024. The sessions involved an interactive Menti presentation where students connected via mobile devices to provide their perspectives on planning issues relevant to our local area. The presentation was also shared with local teachers so they could run independent sessions with their students.



How we invited responses

We offered two options for responding to the Joint Local Plan Preferred Options Consultation: The Joint Local Plan in a Nutshell and the Joint Local Plan Full Survey.



Joint Local Plan in a Nutshell

This shorter survey showcased the highlights and headlines of the emerging plan, focussing on the key things that were changing from the existing adopted local plans. We used active language and plain English, with infographics, images, videos and embedded questions. This survey provided fast facts and quickfire questions.

Joint Local Plan Full Survey

This longer survey took a more conventional long-answer structure, going through each policy. This survey was designed for respondents who would have the time and interest to dive deeper into the details of the proposed policy options and draft policy wording. We anticipated this would be more popular with planning agents and parish councils, but anyone could choose to answer via the Nutshell or the Full Survey.

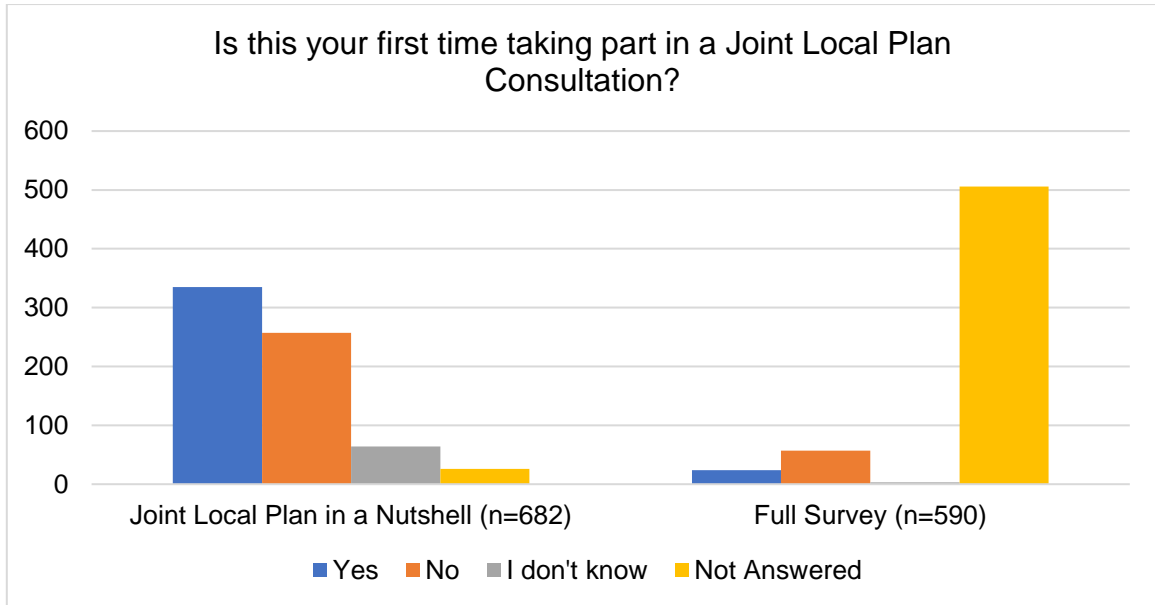
Both surveys were available as online forms, with paper copies available at deposit locations and drop-in events. The paper versions of the surveys are available to view in Appendix G.

Reception

We received a high level of response to our Joint Local Plan Preferred Options Consultation, with over 1,200 people responding in total (combining both surveys).

More people stated that it was their first time taking part in a Local Plan consultation in the Joint Local Plan in a Nutshell survey than the Full Survey.

83% of respondents to the Nutshell said that based on their experience of taking part in the Joint Local Plan consultation, they were either likely or very likely to take part in a future consultation.



Some respondents commented:

"I think this is much more accessible than previous consultations."

"A lot of questions but the questionnaire was well thought out and stimulating so that it took about an hour. Liked the way you could refer back to information and save work in stages"

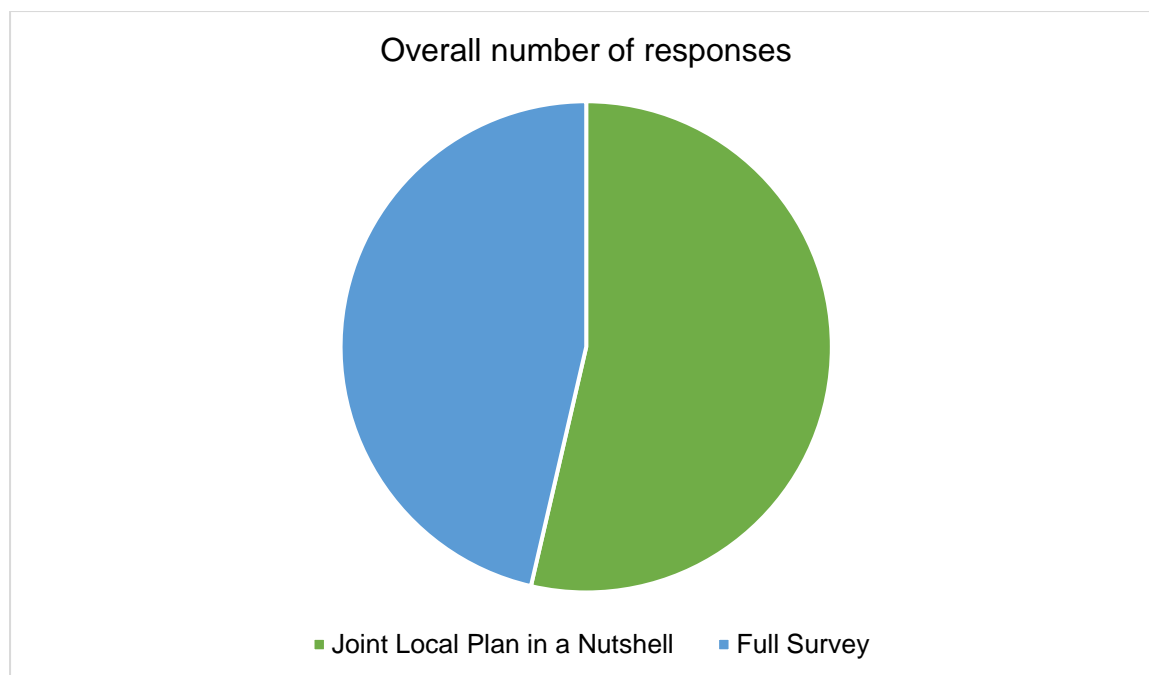
"The interactive website was very helpful, and this survey (with the ability to save and continue later) was very well laid out."

Section 2: Consultation Responses

Overview

We received over 1,200 responses to the Joint Local Plan Preferred Options Consultation, with 682 people responding via the Joint Local Plan in a Nutshell Survey and 590 people responding via the Full Survey.

Letter and email responses were uploaded into the corresponding survey for analysis purposes.



Structure of this section

As described in Section 1, there were two ways to respond to the Joint Local Plan Preferred Options Consultation, via the **Joint Local Plan in a Nutshell Survey**, or by the **Joint Local Plan Preferred Options Full Survey**.

Section 2 summarises responses to both surveys thematically, organised around the chapters of the Joint Local Plan as presented during the Preferred Options Consultation. This means the main issues raised in the Joint Local Plan in a Nutshell on climate change, for example, can be found alongside the main issues related to climate change raised through the Full Survey. The heading will explain which survey the graphs and summaries relate to, and Nutshell responses are colour coded in green, which Full Survey responses are colour coded in blue.

The description of how the main issues have been taken into account for each policy address both responses received through the Nutshell and the Full Survey.

About the Districts

General comments regarding Chapter 2: About the Districts

Full Survey: Summary of main issues raised

Historic England recommended including heritage within the outline to the districts.

Oxfordshire County Council suggested that as well as highlighting the key issues facing the districts, this section should be more positive about the potential opportunities to reduce emissions through the use of renewable energy and other interventions (e.g. EV infrastructure and carbon sequestration) as identified through PAZCO.

How the main issues have been taken into account

While it was not possible to include heritage assets in the static map in Chapter 2 of the Joint Local Plan without losing legibility, the interactive Policies Map available online does show the districts' Conservation Areas, Scheduled Monuments, Registered Parks and Gardens and Registered Battlefield. The purpose of Chapter 2 is to outline the key issues that were identified during early consultation on the Joint Local Plan, opportunities are highlighted throughout the rest of the plan.

Vision and objectives

Full Survey: Summary of main issues raised by representations

There were a good number of comments in support of the draft vision and objectives. This was the first open answer question in the survey, so some people made general comments here about the plan as a whole or about other sections or policies e.g. spatial strategy, quantum of housing or employment, carbon policies, the rural areas. To avoid repetition, we've picked those broader points up under the relevant section instead.

Of those who made suggestions or gave negative feedback on the draft vision and objectives:

- Some people said the vision was unrealistic or too aspirational, while some thought it wasn't ambitious or aspirational enough.
- Other people said it was good, but the plan as drafted didn't follow through on what the vision and objectives set out to do.
- Of those who didn't like the vision, some thought it went too far in terms of zero carbon and the climate agenda, while others thought it didn't go far enough.
- Several people suggested that dates for reaching net zero carbon districts should be the same for South Oxfordshire and Vale of White Horse rather than 2030 and 2045 respectively.
- Some people took the opportunity to tell us how previous plans and planning decisions haven't met this new vision e.g. homes being built now don't meet net zero carbon environmental standards, don't have enough active travel infrastructure, or previous planning decisions haven't protected heritage.
- Some site promoters told us the plan should have a vision for a longer time span and plan for 20 or 30 years, not 16 years from adoption. One said that the plan timetable was optimistic, and the plan period should be extended to 2043.
- Some respondents wanted a re-ordering of elements of the vision, for example agents suggesting placing growth considerations to the fore, with carbon neutrality/environment further down the list as products of a sustainable growth strategy, especially because of South Oxfordshire and Vale of White Horse's strong economic presence (e.g. Science Vale). In a similar vein, a housing association suggested re-ordering so that meeting housing need comes top.
- An agent thought that the evidence underpinning the objectives needed to be more robust, and also recognise that future legislation, and or regulation may dictate how these matters are dealt with.
- A number of site promoters for omission sites took the opportunity to tell us how their site would contribute well to meeting the vision and objectives.
- Individual agents representing sites pressed for wording changes to the vision to support alternative locations, for instance to recognise economic

opportunities outside of Science Vale, or to refer to the important relationship with Oxford City, or to refer to further unmet need from Oxford.

- One agent questioned the objective on setting a framework for successful neighbourhood plans, due to a lack of a strategic steer for NDPs when it comes to appropriate levels of growth. Another agent suggested more emphasis in the vision on affordable housing in rural areas.
- A couple of parish councils suggested adding to the vision more specific references to particular issues e.g. sewerage, flooding or NHS services. One of them commented that the objectives were 'one size fits all', and so didn't address the distinct qualities/issues of their parish.
- There were a few requests for adding detail to the objectives. Some examples were adding 'tenure-specific housing in the right locations' (Objective 8), a suggestion to refer to the expected National Development Management Policies (in Objective 1), and to expand the climate resilience wording to show this is key to maintaining a thriving economy (Objective 3).

The **Environment Agency** suggested expanding the wording about flooding so that as well as talking about flash floods, we also address larger slower flood events that are likely in future, associated with the River Thames.

Historic England supported the proposed vision and objectives.

National Highways welcomed the Council's vision to provide sustainable development with a focus on reducing carbon emissions whilst promoting active travel and public transport use to limit car journeys and congestion locally, and on the wider network.

Oxfordshire County Council warmly supported the vision and objectives as being in line with their work. They suggested a topic paper to explain how the policies align with the carbon budget targets at the district level (Objective 2), that we should be aiming to make great communities as well as great places (Objective 10), the climate change adaptation should include retrofit (Objective 3) and that Objective 7 should include the historic environment as well as the natural and built heritage.

Reading Borough Council supported Objective 8, particularly the need for affordable housing. Objective 11 should recognise the role that transport provision plays to neighbouring authorities.

Sport England liked the vision and objectives but suggested referring to 'Active Design principles' in Objective 6, and also ensuring access to both formal and informal sports facilities.

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) supported Objective 6 on helping communities lead healthy and more active lifestyles and Objective 11 relating to infrastructure.

How the main issues have been taken into account

Most people liked the vision and objectives. The vision is designed to paint a picture of what the local area will be like, giving a flavour of the broad philosophy of this

plan, and mark a shift towards meeting the challenges of the climate emergency, nature, and community wellbeing. Those who raised issues tended to be suggesting a fundamentally different approach and a different plan. For example, agents seeking more growth, more greenfield development, stronger emphasis on employment clusters, more unmet need from Oxford. It seems the right approach for a local plan vision to be by nature aspirational, shaped by the priorities of elected members, and rooted the current issues and trends of the local area. The vision is designed to shape the districts over the plan period in line with those priorities, so changing to another person or organisation's vision does not seem the right approach.

Where a parish council wanted reference to a particular issue in their area, this could make the plan's vision disjointed or unwieldy. We work hard to support neighbourhood planning, so sitting below an overarching area-wide vision, a neighbourhood plan vision is the best place way to capture parish-specific issues. That said, healthcare facilities and flooding already feature in the objectives and later policies, and we made a change to add in 'sewerage' next to 'water' in the infrastructure list of Objective 11, as this is an issue with a growing profile in the districts.

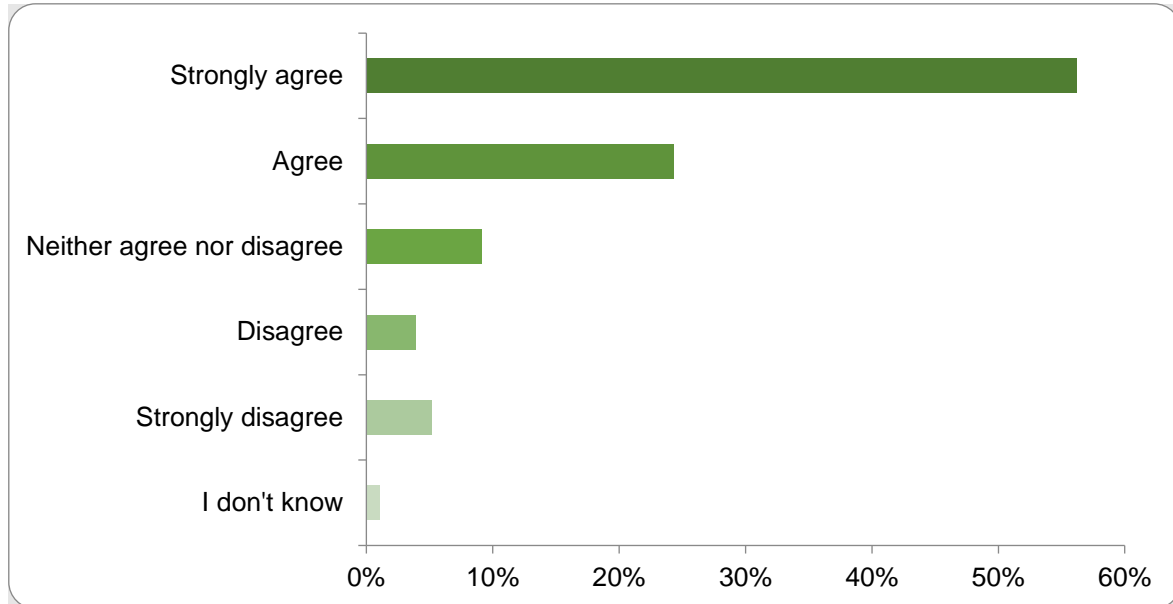
Several people asked for re-ordering the vision and objectives, to put the concerns they care about most first. The vision and objectives are not in priority order, so we don't need to worry about which come 'top' and re-order them. Quite a few of the suggestions were about adding more specific details or planning jargon into the vision and objectives. Many of these points of detail are picked up later in the plan. If we added everything into the vision and objectives that everyone suggested, we would risk extending and bogging down this chapter, which is purposely about creating concise, accessible, over-arching text in later chapters. We have specific policies to provide the necessary detail later, so didn't need to make a lot of changes to Chapter 3.

Based on the issues raised, we made these changes to the plan's objectives:

- Amended the wording of Objective 3 to refer to longer slow flood event as well as flash floods to address the Environment Agency's comment.
- We added 'sewerage' to the list of types of infrastructure in Objective 11 that need to be planned for in the right places and built at the right times to serve our growing communities.
- At the suggestion of Oxfordshire County Council, we added creating 'great communities' to Objective 10, and broadened objective 3 on climate change adaptation so that it includes retrofit as well as new buildings and infrastructure.

Climate change and improving environmental quality

Nutshell (Section 3): How far do you agree or disagree with the Joint Local Plan raising standards to achieve net zero carbon development across South and Vale?



Of the 633 people who responded to this question, 80% of people either agreed or strongly agreed with raising standards to achieve net zero carbon development. 49 people did not answer.

Nutshell (Section 3): Other comments on net zero-carbon development

236 people answered this question.

As outlined in the figure above, many respondents provided additional comments to indicate their support for delivering net-zero carbon development, which they felt should be a high priority. Responses included support for specific requirements as part of new development, including the provision of solar panels, heat pumps and/or high-quality building materials and insulation on all new homes, with new homes being delivered as carbon neutral or better. Some respondents believed that successful delivery of net zero requires consideration of the whole building supply chain, with a focus on reducing emissions throughout construction.

Comments suggested that Building Regulations are not sufficient to deliver the level of sustainable development required to support a net zero approach – and local authorities should do what they can via strong policy and/or other methods to encourage Government (and developers) to raise standards. However, several respondents also suggested that there is no need to deliver beyond the requirement of Building Regulations, that energy efficiency measures such as heat pumps may not deliver the perceived benefits, and that delivering net zero development is not necessary, attainable, and is too costly.

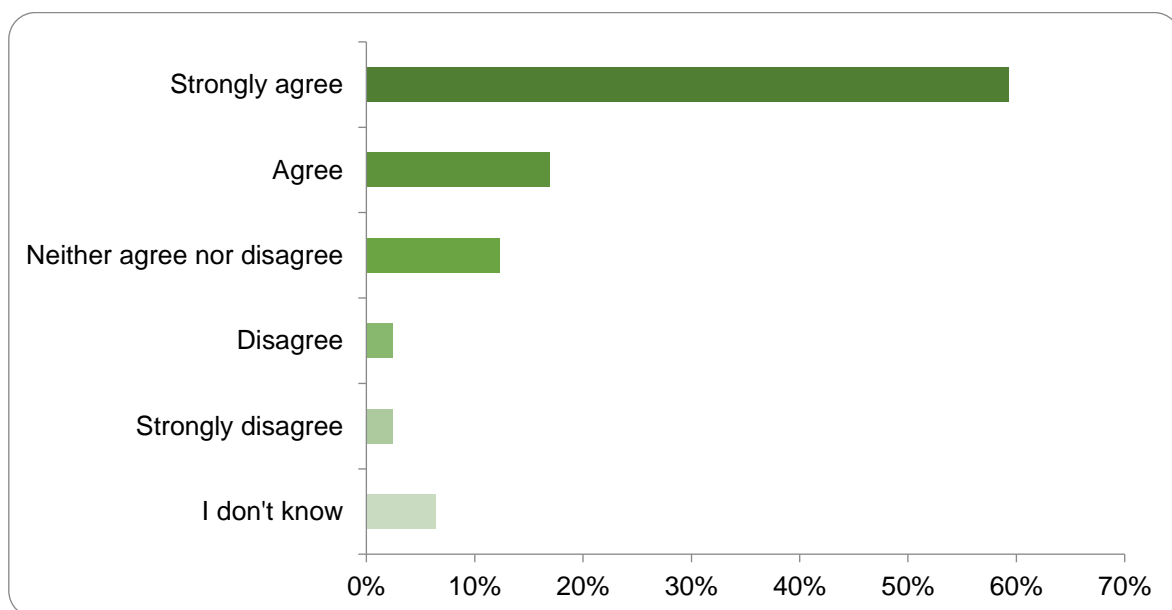
Cost was identified as a key factor, both with respect to cost of delivering net zero development and subsequent increased cost of housing (as a reason to not support), and cost of operation of net zero homes (as a reason to support). This was considered particularly pertinent with respect to affordable housing, which may cost more to deliver but whose occupants would feel the benefit most. Some respondents raised concerns regarding the availability of Government grants to facilitate or ease this dilemma.

Respondents highlighted the need to consider retrofitting of existing homes, and the cost benefits associated with delivering net zero development now as opposed to retrofitting later. Some respondents felt that more should be done to address the energy efficiency and quality of existing homes, with further incentives required to do so.

Improvements to transport infrastructure was also raised as a factor in delivering more sustainable development. Comments ranged from support for electric vehicle charging as part of new developments to improving active and sustainable travel networks, such as walking, cycling and public transport routes. Respondents raised a need to reduce car dependency and instead prioritise more sustainable travel modes, with good public transport links to new homes and local facilities.

There were some concerns regarding the location and effectiveness of solar farms; some respondents did not feel it was appropriate to be delivering solar farms on greenfield sites, and instead homeowners should be encouraged to add solar panels to their homes. It was felt that solar farms should only be permitted where there are not adverse effects.

Nutshell (Section 10): How far do you agree or disagree with our proposed policy approach to wastewater infrastructure?



Of the 607 people who responded to this question, 76% of people either agreed or strongly agreed with our proposed policy approach to wastewater infrastructure. 75 people did not answer.

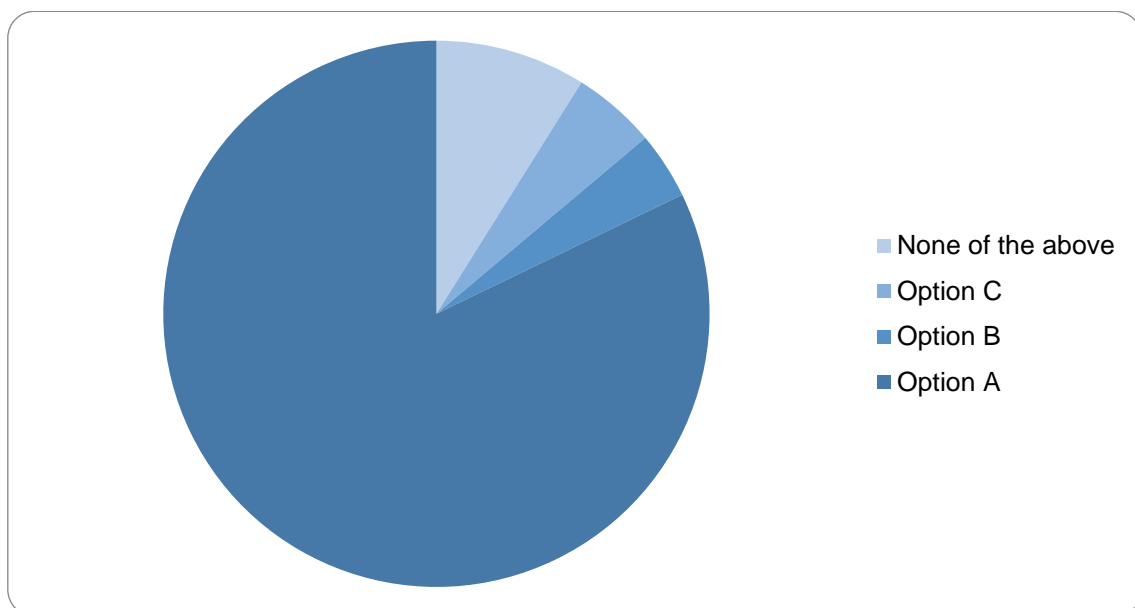
Nutshell (Section 10): Other comments on water quality and wastewater infrastructure

228 people answered this question.

Many respondents raised concern about the pollution of watercourses, particularly related to sewage flooding concerns. Upgrades were considered essential to drainage and sewerage networks to meet existing and increased demand. Respondents suggested these upgrades are necessary prior to new development and occupation, which will make the system and flooding worse. There was dissatisfaction with Thames Water, particularly around their service and the fact respondents felt they should take responsibility for pollution incidents. The policy is supported where it improves standards, but some respondents thought policy action was long overdue, and it should do more, with further mitigation and enforcement necessary. Some respondents raised objections to the proposed reservoir, with a smaller number supporting it.

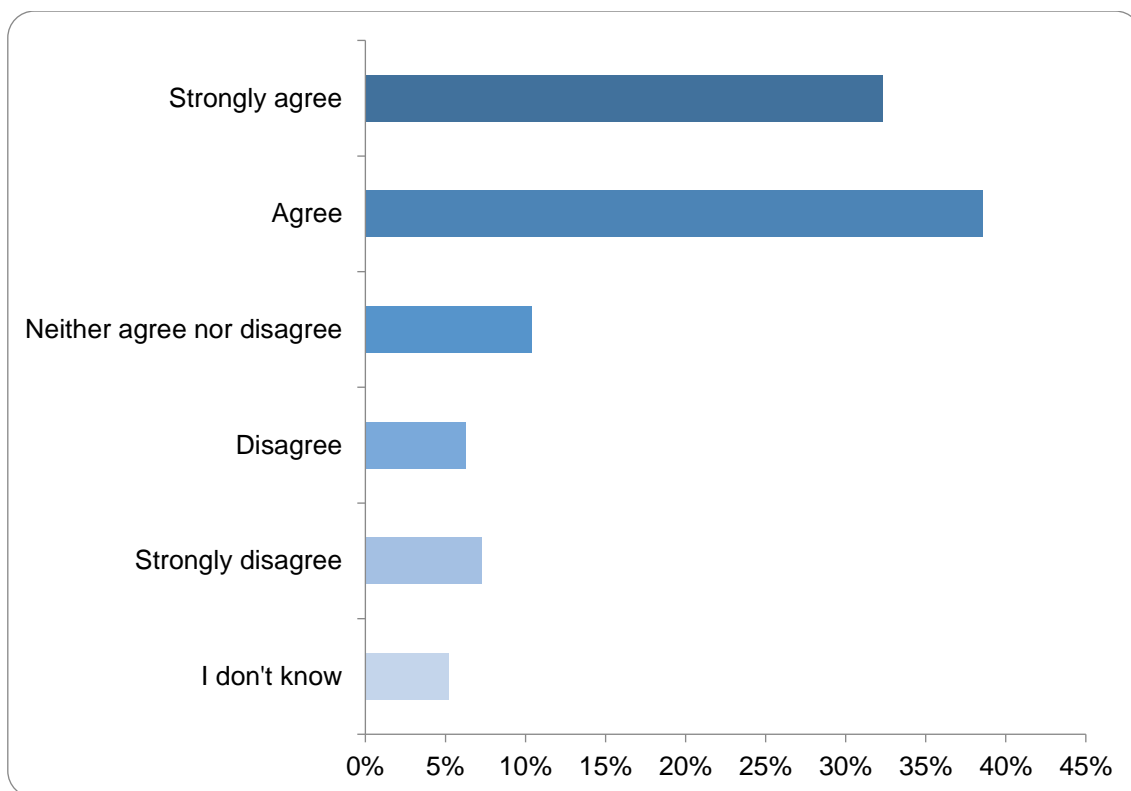
Policy CE1 – Sustainable design and construction

Full Survey: Which option do you prefer?



Of the 101 people who responded to this question, 82% preferred Option A. 489 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 96 people who responded to this question, 71% either agreed or strongly agreed with the proposed draft policy wording. 494 people did not answer.

Full Survey: Summary of main issues raised

- There was broad support for Option A, with many respondents agreeing that it is very important that the Local Plan delivers sustainable development in light of the climate crisis.
- Some concerns were raised regarding the cost and prescriptive nature of Option A requirements, particularly viability implications for developers as well as some respondents questioning if extra costs would be passed onto homeowners/buyers. A number of respondents stated that Option A would be going beyond national policy requirements, particularly in terms of Part 2(c) which requires an overheating assessment to be submitted through the completion of CIBSE TM59/TM52. It was mentioned by some that implementing this requirement is onerous and would be costly.
- It was raised that requirements relating to the overheating assessment, specifically CIBSE TM59/TM52 could be superseded, so it should include wording to account for this.
- A few respondents questioned the role of this policy in the context of Policy CE2 (Net Zero Carbon Buildings), as well other policies, notably Policy CE6 (Flood risk and drainage), Policy CE7 (Water efficiency) and Policy DE1 (High quality design). They raised that there is some duplication of policy requirements.
- It was suggested that the wording of the policy should be strengthened from stating 'should seek to' to 'must'.

- Some developers stated that they were already meeting the requirements of the policy by building sustainably and noted that they would continue to do.
- The need for all developments to be climate resilient was supported, however it was suggested that there should be mention of extreme weather more broadly, so that it includes the aspects already included as well as droughts and extreme cold.
- It was raised by a respondent that the policy should actively discourage the use of air conditioning units, and that preventing new buildings from becoming overheated should be achieved by good design rather than systems that require energy.
- Most of the respondents that raised concerns with the policy, agreed with the aim of delivering sustainable development and the important role a Local Plan plays in addressing climate change, with particular support shown for the fabric first approach.

The Environment Agency stated that they welcomed the inclusion of requirement 2 a) which relates to reducing the risk of flooding and the conservation and storage of water.

Historic England support Policy CE1.

Oxford City Council question the meaningful impact a new development can have on reducing the heat island effect as this is a cumulative problem across urban areas. They suggested the term 'built to last' was unclear, and perhaps is addressed already in the embodied carbon policy. A number of specific wording changes are also suggested to a number of terms.

Reading Borough Council support Policy CE1.

Oxfordshire County Council noted that part 4 of the policy that refers to innovative design, should be more clearly defined in terms of how development should achieve it. They also stated that clearer language should be used in the first two parts of the policy for clarity and comprehension. They recommended a number of additions and small amendments to the policy. They welcomed the reference to the fabric first approach and recommended it is defined further in supporting text. They also recommended collating the statements required in Policies CE1 and CE2, to reduce the number of documents needing to be submitted at the application stage.

Oxfordshire County Council's Climate Action Team suggested that Part 6 of Policy DE1 should be merged into Policy CE1 due to the degree of overlap between the principles of net zero design and climate mitigation and adaptation.

How the main issues have been taken into account

The policy has been reviewed to ensure there is no duplication of policy requirements in other areas of the plan, only signposts to other policies. We note the recommendations to merge policies together, such as Policies CE1 and CE2. However, we think it is most appropriate to keep them as separate, particularly as it would result in very lengthy policies if they were merged. In response to Oxford City Council, we recognise that the heat island effect is a cumulative problem, however

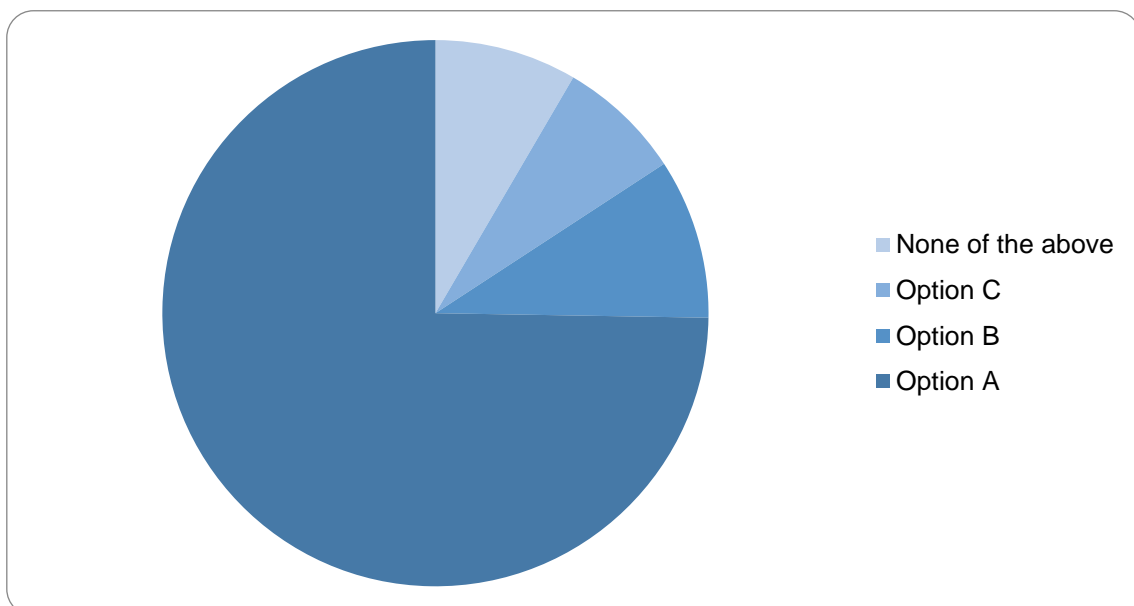
we feel it is still very important that new developments to tackle the heat island issue, as even small improvements have a beneficial impact.

Policy changes include:

- Policy text has been amended to address the point raised regarding CIBSE TM59/TM52 potentially becoming out of date in future. This element of the policy has also been retained and its justification set out in our Net Zero Carbon Study, which provides a robust and credible evidence base upon which the soundness of the Joint Local Plan can be assessed.
- The policy wording has also been strengthened to amending references from 'should' to 'must'.
- We agree with Oxford City Council that Part 3 of the policy that referred to new developments needing to be built to last is not very clear and is sufficiently covered by Policy CE3 (Embodied Carbon). Therefore Part 3 of the policy has been deleted.
- We also recognise that the policy could be stronger at discouraging air conditioning units, and therefore wording has been added to ensure these are only incorporated as a last resort. Supporting text also further discourages the use of air conditioning units, explicitly stating that these generally won't be supported.
- Further text has been added to the policy regarding extreme weather, which now includes a reference to droughts. Reference to extreme cold was not included because as a result of climate change these events are likely to become rarer and is already sufficiently addressed by the reference to heavy snowfall events for when extreme cold does occur

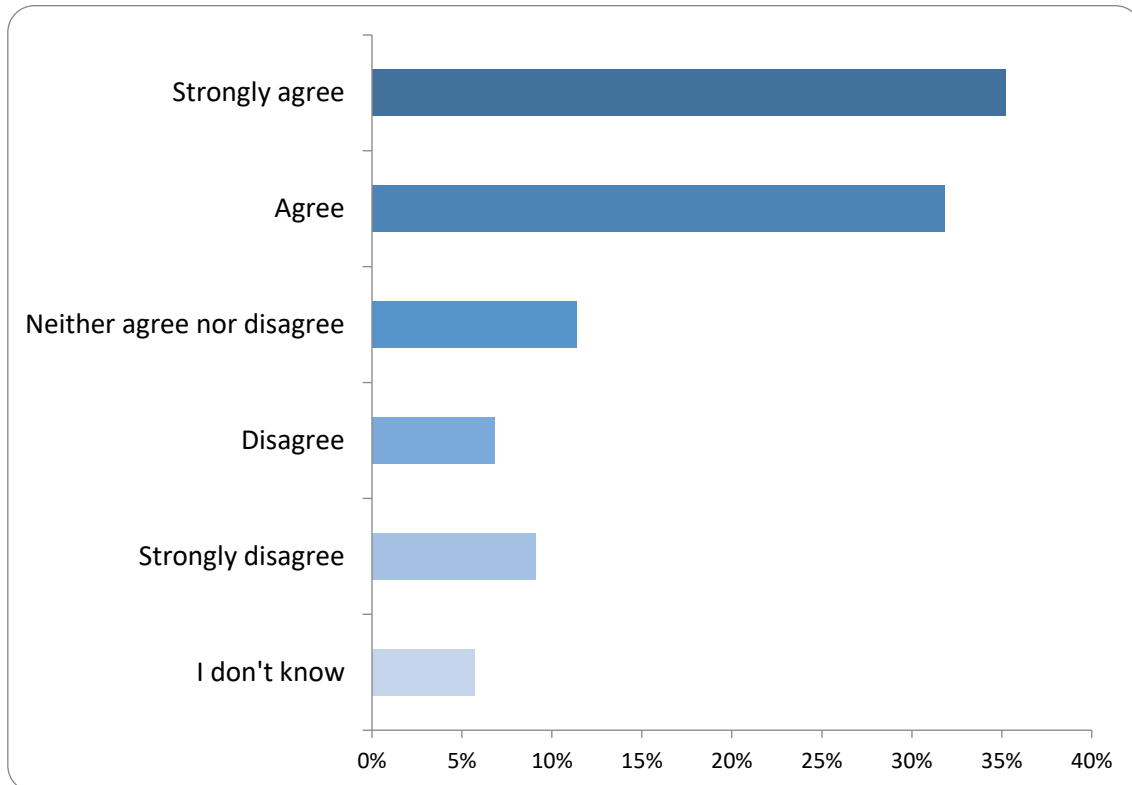
Policy CE2 – Net zero carbon buildings

Full Survey: Which option do you prefer?



Of the 95 people who responded to this question, 75% preferred Option A. 495 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 88 people who responded to this question, 67% either agreed or strongly agreed with the proposed draft policy wording. 502 people did not answer.

Full Survey: Summary of main issues raised

- There was broad support for Option A, with respondents noting that it will help to reduce carbon emissions, meet net zero targets, increase fuel security, and provide housing that is cheaper to run. Notably, the majority of respondents opposed to Option A stated that they supported the aims of the policy to address carbon emissions and make buildings more sustainable.
- Several respondents stated that they didn't agree that the policy requirements should go beyond national standards set out in building regulations, or what is planned to be implemented through the Future Homes Standard, and requested the policy aligns with these. Concerns were raised that the policies energy efficiency metrics were not aligned with the Written Ministerial Statement (WMS) entitled 'Planning – Local Energy Efficiency Standards Update' dated 13 December 2023, and therefore requested for the policy approach to be reviewed. For context, the WMS seeks to limit the use of policy approaches that use energy-based metrics like those set out in Policy CE2.
- There were concerns raised regarding whether the policy requirements for Option A would result in additional costs for both developers. Some

respondents were also concerned that these requirements would impact the affordability of new homes, making them more expensive for to purchase.

- Several respondents disagreed with the policy approach in Option A that allows for offsetting in exceptional circumstances and argued that offsetting should not be an option. A specific point was raised that they didn't want developers to seek to pay contributions rather than deliver the policy requirements.
- A number of respondents requested that the policy required solar panels as standard on all new buildings.
- There were concerns raised that the high standards of energy efficiency set out in Option A would potentially impact housing delivery, because these higher levels of fabric efficiency may require new skills and materials not readily available, impacting supply chains.
- Concerns were also raised that energy intensive uses, such as data centres and laboratory spaces may struggle to meet the high energy efficiency standards required by the policy, and therefore it has the potential to stifle innovation in fields of research that may be helping address the climate crisis or support the move to a net zero economy.
- There were some recommendations provided regarding the EUI targets set out in Option A, for example that they should be a site wide rather than individual building requirement, and also that the targets should be aspirational rather than required.
- Several respondents raised the general view that achieving net zero carbon buildings was unachievable and questioned the concept of climate change.

Historic England queried the merits and logic of specifying issues in policy and wonder if this might be more suitable for supporting text. Giving examples prompts the question whether they represent a comprehensive list or should be attributed more weight than other examples. Heritage considerations may also be a factor in determining the extent to which on-site energy targets may be achieved.

Oxford City Council asked in relation to Part 6(c), if the Councils envisage situations where developments would be permitted to be built with fossil fuels in exceptional circumstances. In relation to Energy Demand Management element of policy they ask if there any expectations for larger/major development to do more than minor. They would also welcome the opportunity to collaborate on supplementary guidance so it may be of use to all our authorities.

Reading Borough Council support Policy CE2.

Sport England raised that we would need to think about how energy use targets required by this policy will be monitored. They also questioned how the policy will work on all sites, specifically infill, but supported the possibility to offset in circumstances where requirements aren't achievable.

Oxfordshire County Council's climate action team raised their support for this policy, but noted it will need to be considered against the requirements of the 13 December 2023 WMS. They also suggest that Area-based insetting (ABI) should be

considered as an alternative to offsetting, and recommend S106 funds are used to scale up retrofit schemes. They also suggested policy amendments that relate to referring to the energy hierarchy. Their estates team had concerns about the delivery of the policy.

Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board supported Policy CE2 Option A that promotes carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, they highlighted that NHS property could benefit from carbon offset funds, to support the NHS to reach its goal of becoming the world's first net zero healthcare provider.

Homes England emphasised the importance of the JLP being informed by and consistent with the WMS regarding local energy efficiency standards. They recognise that the evidence base includes some viability work on the costs of net zero carbon, but advise further analysis of all policies and a greater range of types and sizes of sites is required in order for the JLP to be robustly costed as required by the WMS in order to avoid rejection at examination. Moreover, the policies need to have flexibility to ensure they don't prohibit sustainable development through stringent requirements, which could impact viability and therefore delivery of other policy requirements, for example affordable housing.

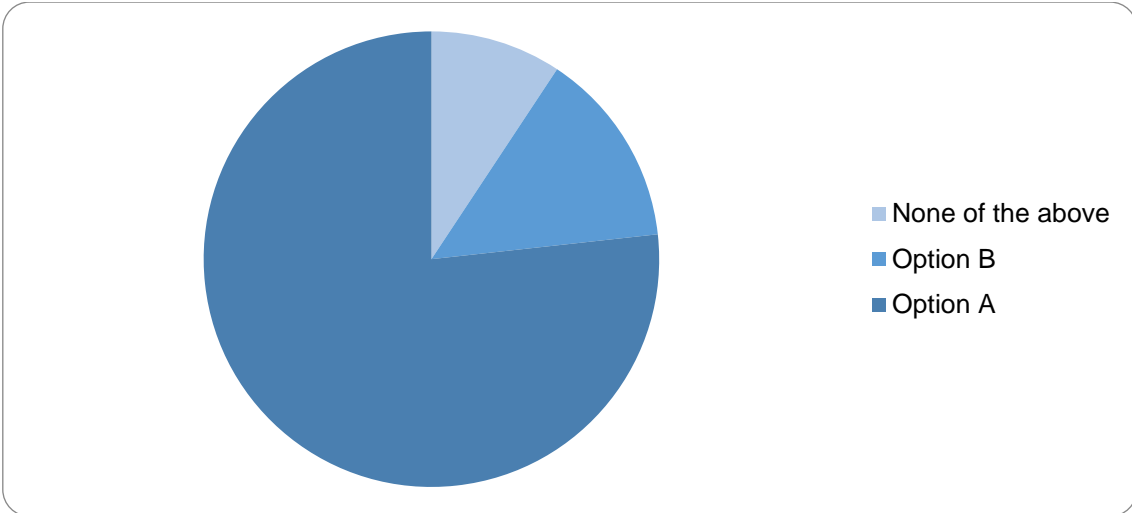
How the main issues have been taken into account

A Net Zero Carbon Study has been produced to inform the plan, from which this policy has been developed. The policy requirements have been reviewed by the Net Zero Carbon Study costs report in terms of viability and have been tested in the whole plan viability report alongside other plan requirements and have been found to be viable. The policy requirements have also been tested in terms of feasibility through the Net Zero Carbon Study feasibility study. The offsetting requirements in the policy will also provide allowances for the exceptional circumstances where the energy efficiency targets cannot be achieved. The policy has also been reviewed in light of the 13 December 2023 WMS and we have subsequently published a report that forms part of our evidence base which sets out that there are demonstrated local circumstances that provide a robust justification for departing from national policy.

Additionally, we recognise the point raised that energy intensive uses with high unregulated energy loads may struggle to meet policy requirements. Part 3(b)(v) of the policy addresses this issue by setting limits on just regulated energy loads, where the unregulated energy loads are accepted by the Council and demonstrated to be as efficient as reasonable for the use. We also agree that building mounted solar thermal or PV should be used widely across the districts, and Policy CE5 (Renewable Energy) encourages and supports building mounted solar installations wherever possible. However, this policy does not explicitly mandate the use to provide flexibility on how policy requirements can be met, which may be achieved through other renewable energy sources.

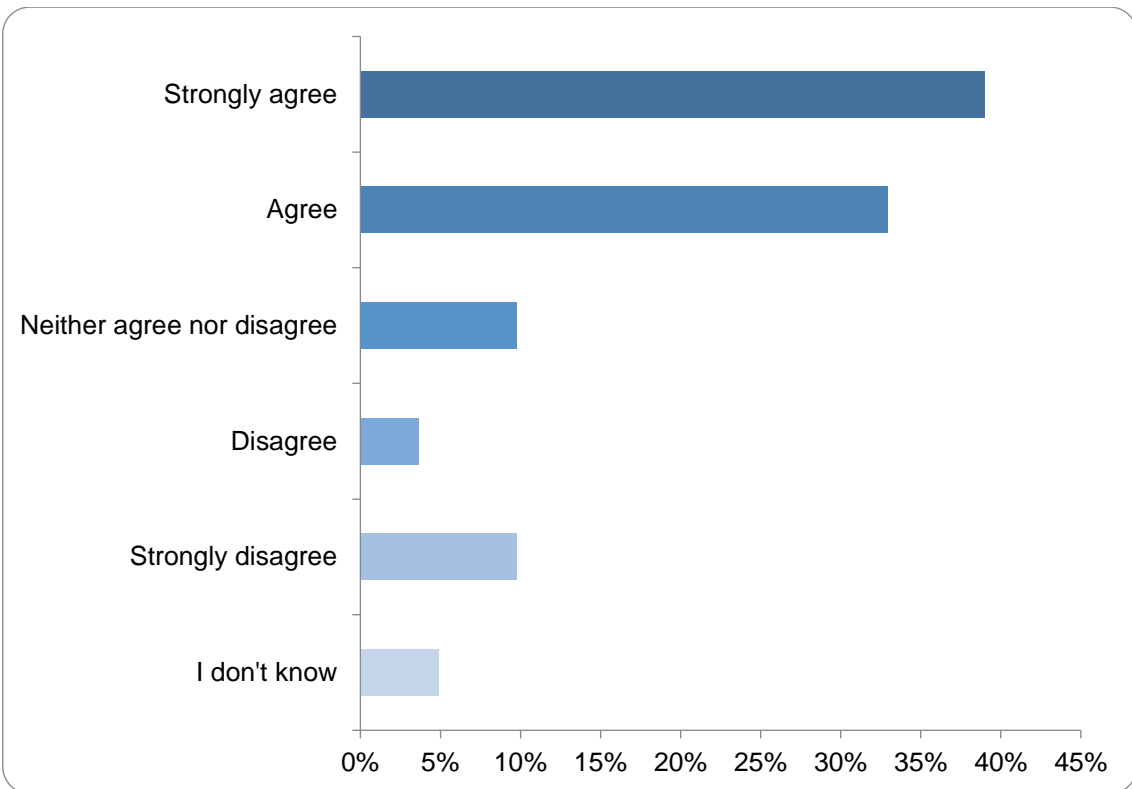
Policy CE3 – Reducing embodied carbon

Full Survey: Which option do you prefer?



Of the 86 people who responded to this question, 77% preferred Option A. 504 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 82 people who responded to this question, 72% either agreed or strongly agreed with the proposed draft policy wording. 508 people did not answer.

Full Survey: Summary of main issues raised

- The majority of respondents supported Option A, welcoming the ambition of the policy and generally agreeing that embodied carbon emissions should be

addressed by applicants, and that all new development should seek to ensure effective use is made of building materials and natural resources.

- Concerns were raised regarding the cost of materials with lower embodied carbon content, and whether these costs would be passed on to the consumer or impact the viability of future developments. Several respondents noted that embodied carbon requirements should be set out in national policy or building regulations, not by local plan policy.
- A few respondents noted that some information required to establish embodied carbon is not available until the detailed design stage, and therefore the requirements set out in Option A should apply only to full or reserved matters applications or planning conditions, and not outline applications.
- Concerns were raised with the ability to offset the embodied carbon emissions with financial contributions, and whether this is the right approach.
- There was concern that materials with lower embodied carbon may be lower quality or less reliable/safe.
- A question was raised as to whether it is possible to determine whether these requirements are viable or deliverable across all development, or whether the 50-unit threshold is suitable, without a holistic viability assessment of the plan being conducted.
- The Part Z notion, which proposes to amend Building Regulations to require the assessment of whole life carbon and set limits on embodied carbon, was raised by a respondent. They considered that the embodied carbon requirements set out in Option A should be left to be decided by government through the Part Z notion, and this policy shouldn't pre-empt that process.
- It was highlighted that it will be important for this policy to stay up to date, particularly due to emerging agreed industry standards, targets and guidance on how to most appropriately address embodied carbon emissions.

Historic England welcomed the thrust of the policy but suggest minor change to criterion c to acknowledge the importance of heritage significance.

Oxford City Council questioned how we will balance limiting embodied carbon against securing sustainable buildings in operation in future. They also asked if Part 4 suggests two different carbon offset funds for addressing CE2 and for embodied carbon.

Reading Borough Council supported Policy CE3.

Oxfordshire County Council welcomed the inclusion of a standalone policy on embodied carbon. They suggested several minor amendments to the policy wording, as well as recommending that the whole life carbon assessments required by the policy are submitted at the pre-application, submission and post construction stages of new development. They also provided recommendations on what the whole life carbon assessment should include. Additionally, they recommended that a supplementary planning document is created to help implement the policy and guide applications.

Thames Water, Affinity Water and Southern Water stated that draft Policy CE3 must be carefully reviewed and considered moving forwards in light of the 13 December WMS.

How the main issues have been taken into account

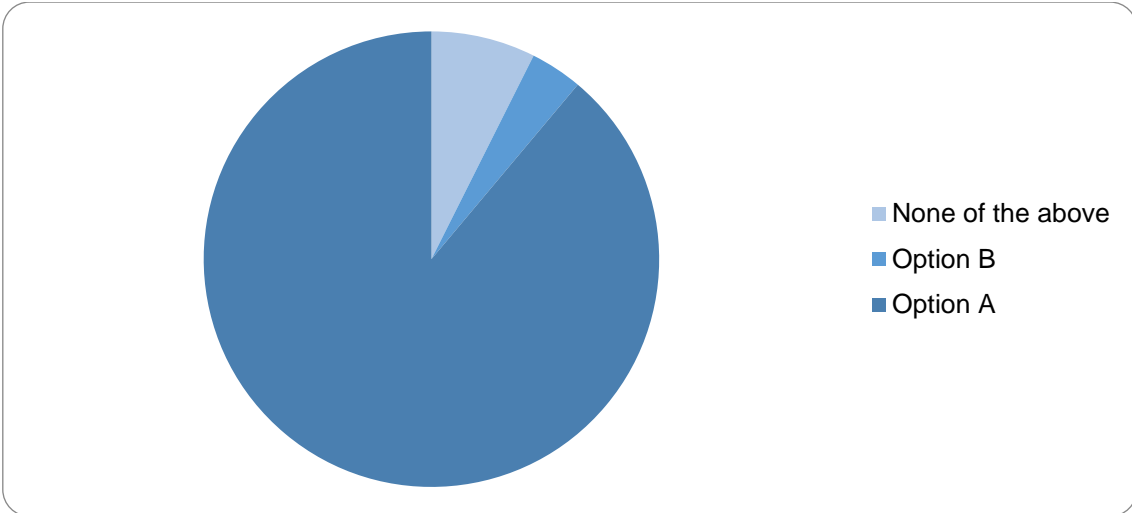
The policy has been reviewed to ensure it is future proofed in light of the emerging industry standards and has been informed by the Net Zero Carbon study which advises that current requirements are achievable. The policy includes a stepped approach to non-residential embodied carbon requirements, recognising that due to the specialist construction materials and techniques required to meet these may not be widely achievable yet. However, this higher standard is expected to be achievable by 2030, when the specialist materials and techniques are presumed to become cheaper and more commonplace. Historic England have recommended a minor amendment to Part C, however this has not been included as we consider Policy NH8 (The historic environment) to adequately address this point without further reference needed in this policy. In response to Oxford City Council's question regarding offset funds, there would indeed be two separate offset funds, one relating to Policy CE2 and one for Policy CE3. This is because they will have different requirements surrounding the use of these funds. We also note the point made regarding ensuring this policy is consistent with the 13 December WMS. We are satisfied that the WMS does not affect embodied carbon policies, as the WMS relates to energy efficiency policies (such as Policy CE2).

Policy changes include:

- The policy requirements have been reviewed by the Net Zero Carbon Study costs report in terms of viability and have been tested in the whole plan viability report alongside other plan requirements. This found that there were viability concerns with some of the residential embodied carbon requirements. Therefore, the policy has been amended from 'mandatory' to 'encouragement' for Vale residential developments and for as specialist older persons housing with care accommodation in South.
- Text has been added so that other residential developments of less than 50 homes and non-residential developments less than 5000m² are also encouraged to meet the standards.
- Minor policy amendments have also been made in light of Oxfordshire County Council's response, including reference to recycled and secondary waste materials in Part 1(c), as well as a correction to Part 2 to refer to construction equipment more generally rather than just construction plant.

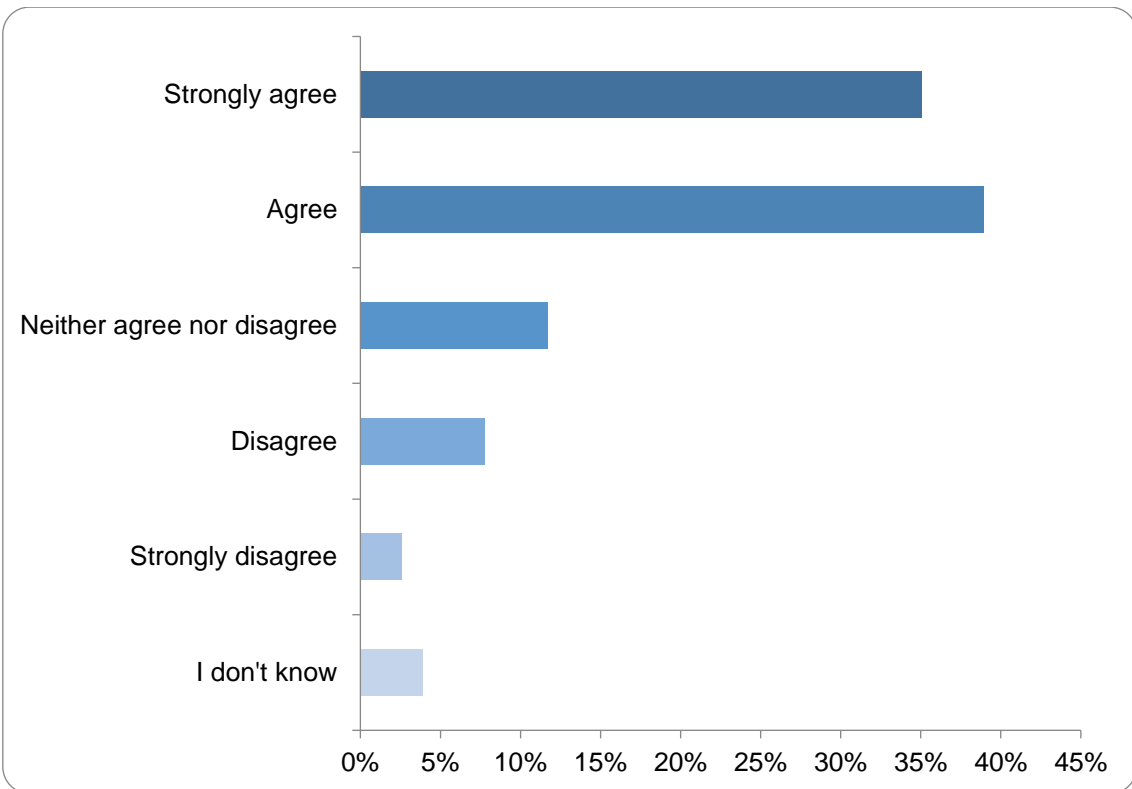
Policy CE4 – Sustainable retrofitting

Full Survey: Which option do you prefer?



Of the 81 people who responded to this question, 89% preferred Option A. 509 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 77 people who responded to this question, 74% either agreed or strongly agreed with the proposed draft policy wording. 513 people did not answer.

Full Survey: Summary of main issues raised

- Option A was supported by the majority of respondents, with it noted by many that retrofitting is key to tackling climate change.

- Several respondents were pleased to see a whole building approach has been advocated in the proposed policy text.
- A number of respondents stated that the policy requirements should be stronger in requiring, rather than ‘encouraging’ or ‘supporting’ retrofit opportunities.
- The high cost of retrofitting existing homes was raised by several respondents, where it was noted that it needs to be more financially accessible to the average person, and financial incentives or support should be provided to facilitate the retrofitting of buildings.
- Concerns were raised regarding the sensitivity of retrofitting old or listed buildings.
- A suggestion was made that the policy is clearer regarding the fact it covers both domestic and commercial buildings.
- It was noted that the councils should take the lead in retrofitting their own building stock.

Historic England objected to the policy as currently drafted and outlined that it needs to make reference to key considerations when retrofitting a traditionally constructed building and proposed wording to address this.

Oxford City Council agreed that the policy should promote the need for taking a Whole Building Approach to retrofitting. Their own proposed policy (R3) wording avoids maladaptation which can occur with inappropriate retrofit. They suggest retrofit should be promoted in relation to climate adaptation as much as mitigation.

Reading Borough Council supported Policy CE4.

Oxfordshire County Council supported the inclusion of a policy supporting retrofitting, noting the health benefits it brings and the need to decarbonise and improve the quality of the current housing stock. They recommended that the supporting text references the extensive retrofit required to decarbonise Oxfordshire’s existing building stock, in line with Oxfordshire Roadmap and Action Plan targets. They also proposed several wording amendments to the policy, including adding references to specific retrofit measures to Part 1, and recommend that the whole building approach to retrofit should relate to refurbishments and the repositioning of existing buildings, as well as extensions.

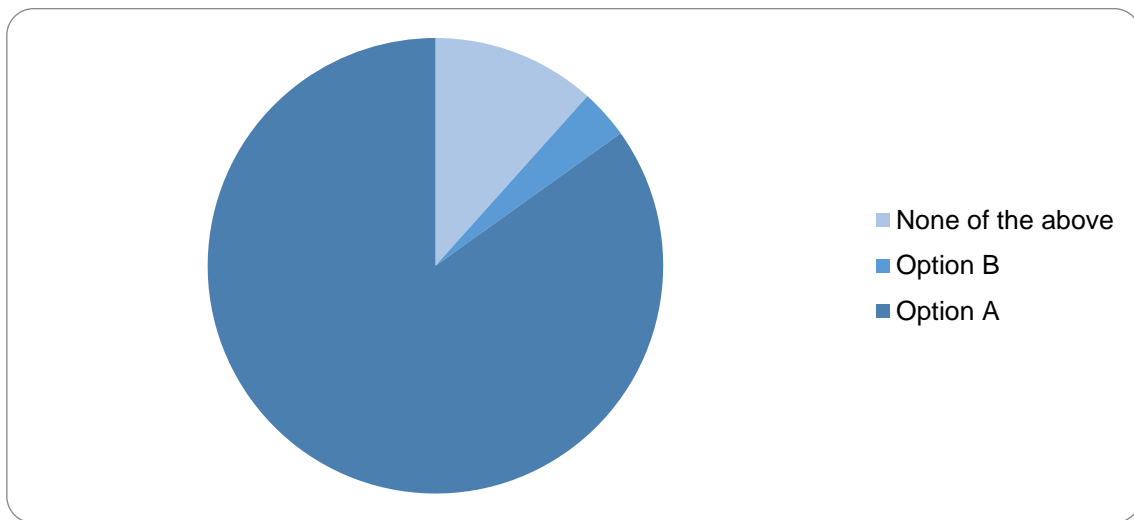
How the main issues have been taken into account

Due to the limited planning powers that relate to retrofitting existing buildings, (since many of these measures do not need planning permission because they are covered under permitted development rights), stronger wording can unfortunately not be implemented in this policy. Supporting text has been included to ensure it is clear that this policy covers both domestic and commercial buildings. To reflect Historic England’s response as well as other similar responses, consideration was given as to whether reference should be made in policy to historic/listed buildings. However, this should be included in supporting text only, as this issue is already adequately addressed in Policy NH13 (Historic environment and climate change). Points made regarding the cost of retrofit and the councils retrofitting their own building stock are

outside of the remit of the Joint Local Plan, and therefore have not been addressed through this policy. In response to Oxfordshire County Council’s response, wording is included in the supporting text that highlights the need to tackle the emissions from existing buildings through sensitive, sustainable retrofitting, due to the significant amount of emissions produced by the built environment that come from existing buildings. The wording amendments they propose have not been incorporated as Part 1 of the policy to sufficiently addresses circumstances where buildings are being refurbished or repositioned.

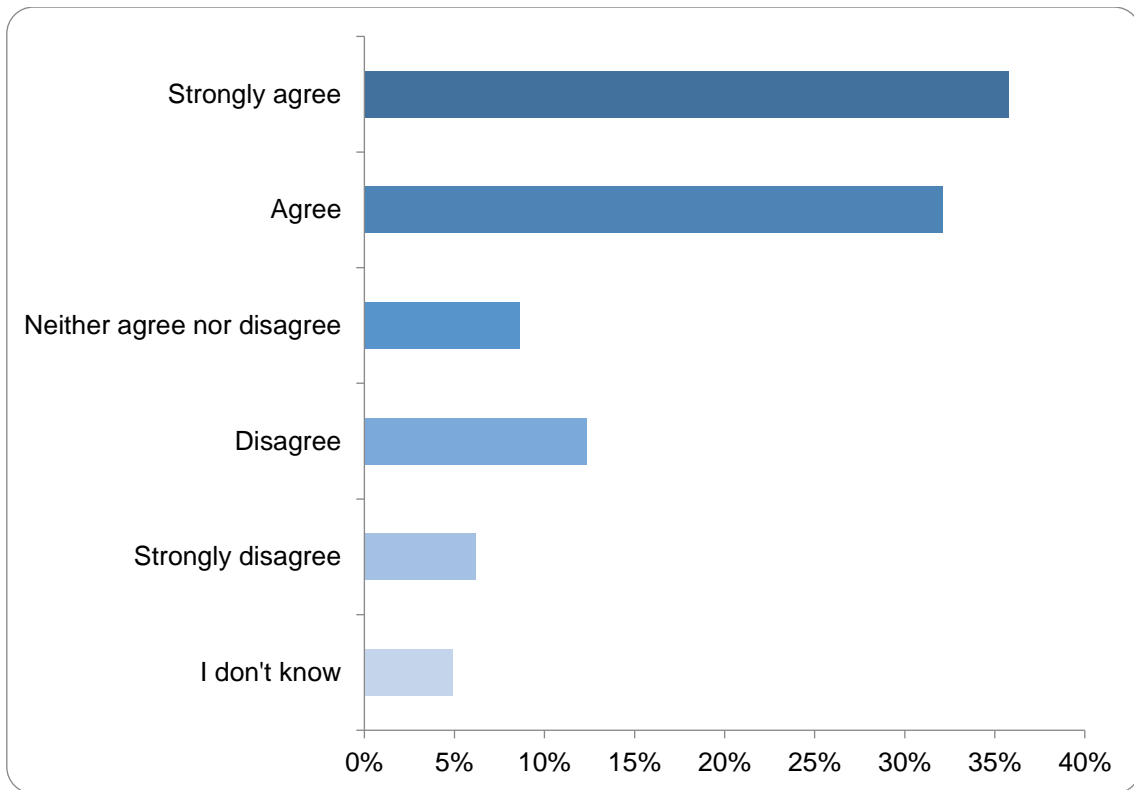
Policy CE5 – Renewable energy

Full Survey: Which option do you prefer?



Of the 86 people who responded to this question, 85% preferred Option A. 504 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 81 people who responded to this question, 68% either agreed or strongly agreed with the proposed draft policy wording. 509 people did not answer.

Full Survey: Summary of main issues raised

- The majority of respondents supported policy Option A.
- Several respondents raised that the policy should take into account competing land use priorities, such as accessible green space and nature recovery, as well as also ensuring renewable energy schemes do not displace land for sustainable food production.
- The policy wording that ensures cumulative impacts of renewable energy schemes are taken into account was supported.
- Concerns were raised regarding the proliferation of large solar farms and their cumulative impacts, particularly on landscape.
- Several respondents suggested that the policy should incorporate a rooftop and/or brownfield first approach to renewable energy schemes, and only permit them on greenfield land in exceptional circumstances.
- Some respondents stated that they could not provide much of an opinion on Option A until the broad areas of suitability are published through the Net Zero Carbon Study.
- Several respondents suggested that the policy should require solar panels on all roofs, as well as over car parks and other suitable locations, whilst another respondent noted that the inclusion of identifying suitable locations for wind and solar in the JLP would remove the need to put solar panels on every roof. It would instead provide opportunities to deliver biodiversity net gain through green roofs on properties, or more innovative and high-quality building designs.

- Some respondents recommended that renewable energy schemes should be encouraged to give benefits to the community, through investment or ownership, with it also suggested that the ownership % set out in paragraph 12 should be increased.
- Some respondents sought clarity regarding the types of developments that are required to demonstrate how energy storage, smart grids and energy sharing networks have been explored.
- A respondent recommended that the word 'standalone' is removed from CE5, as it appears to preclude renewable energy schemes from coming forward as part of sustainable, mixed-use developments.

Historic England welcomed elements of the policy but note that Part 6 states heritage is an important significant consideration for the location of solar energy development, but it is not included for wind energy development. They are keen to ensure that the historic environment adequately informs this element of the spatial strategy.

Reading Borough Council supported Policy CE5.

The Ministry of Defence noted that some infrastructure enabling renewable energy production, such as wind turbine generators or solar panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations. Wind turbines can also interfere with radars and other technical installations. They therefore requested that the policy is broadened to ensure new renewable energy schemes do not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets.

Oxfordshire County Council recommended additional criteria to assess standalone renewable energy schemes against, and noted that where mitigation is not possible that compensatory measures should be considered. They also recommended a number of policy amendments, including noting that for wind energy and solar energy schemes, the plan will need to explain how they consider applications outside of the designated areas.

Natural England welcomed the inclusion of a policy which will identify areas potentially suitable for wind and solar energy proposals. They signposted to the relevant PPG and also highlighted that the JLP should recognise the opportunities that nature provides in terms of climate adaptation. A suggestion was made that this may include greater emphasis on nature-based solutions such as peatland restoration and woodland creation.

Thames Water, Affinity Water and Southern Water noted that they did not dispute that there should be preference should be to retain existing renewable infrastructure where possible, but highlighted that full mitigation may not always be practicable and there is a balancing exercise to be undertaken between local and national need for various types of infrastructure, not limited to renewable generators.

How the main issues have been taken into account

We recognise the concerns raised by several respondents regarding the impacts renewable energy development can have on communities, for example cumulative impacts, and impacts on the environment such as landscape. As part of the Net Zero Carbon Study, a Renewable Energy Spatial Assessment was produced (informed by a Renewable Energy Landscape Sensitivity Assessment) which identifies potentially suitable broad locations for renewable energy development. This assessment considered factors such as landscape, which alongside Part 1 of the policy, helps to ensure that no significant adverse impacts arise as a result of renewable energy development. We also recognise that Part 9 of the policy doesn't specify which types of development should demonstrate that options for energy storage, smart grids and energy sharing networks have been explored. However, this has not been amended because if these options would not be suitable for the proposed development, then this could be stated and agreed at the application stage.

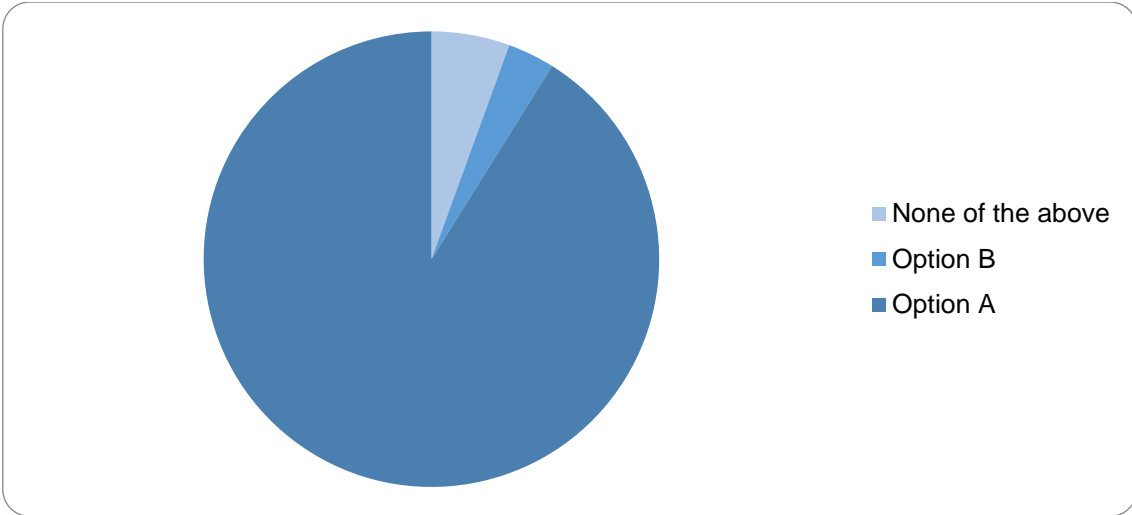
We agree with the points raised in the Ministry of Defence's response and have included wording in Policy DE1 (High quality design) that requires new development to have no impact on the operation or capability of defence sites or assets. We have not amended this policy in light of their response, as Part 3(h) adequately addresses the concerns they raise when also read alongside Policy DE1. We also note points raised, including from Oxfordshire County Council and Thames Water, Affinity Water and Southern Water, regarding mitigation measures, and allowing compensatory measures to be included where mitigation is not possible. However, significant adverse impacts that arise as a result of renewable energy developments need to be sufficiently mitigated in order to prevent long lasting negative impacts on the surrounding environment as well as residents.

Policy changes include:

- The word 'standalone' has been removed from the policy, as we agree that it could potentially preclude renewable energy schemes from coming forward as part of sustainable, mixed-use developments.
- Amendments for consistency have also been made to policy, which addresses Historic England's response which notes a lack of consistency in terms of references to the historic environment.
- We agree with Oxfordshire County Council that the plan should set out text that explains how applications outside of areas identified as potentially suitable will be dealt with, and therefore wording has been included in the supporting text which addresses this.

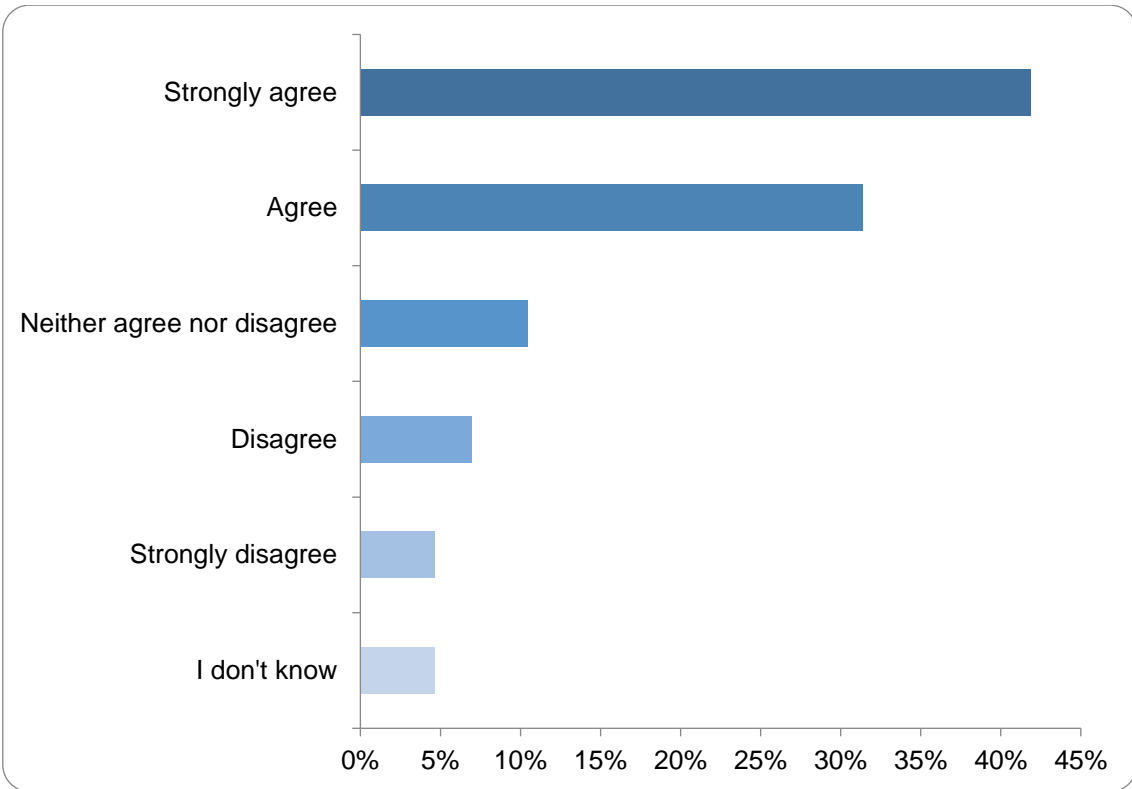
Policy CE6 – Flood risk and drainage

Full Survey: Which option do you prefer?



Of the 90 people who responded to this question, 91% preferred Option A. 500 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 86 people who responded to this question, 73% either agreed or strongly agreed with the proposed draft policy wording. 504 people did not answer.

Full Survey: Summary of main issues raised

- There was support for an updated flood risk policy, but also cautions to avoid duplication of national planning policy and guidance.

- The need for up-to-date flood risk evidence was emphasised, particularly to understand the impacts of proposed development on flood risk and the likely impacts of climate change.
- A number of people felt that more should be done to address existing flood and drainage issues in the districts.
- There was concern that building on greenfield land, building in areas at risk of flooding and/or poor maintenance of drainage systems is increasing the risk of flooding.
- Concerns were raised about flooding in specific locations (Abingdon-on-Thames, Land at Bayswater Brook, Botley, Chalgrove and Culham).
- There was support for addressing flood risk in a way that delivers wider benefits for people and nature.
- It was suggested that requirements for multifunctional SuDS should be strengthened, with reference to the need for high quality design.
- It was suggested that the policy should be clearer on when drainage strategies are required and that a blanket requirement may not be reasonable or proportionate.
- Thames Water suggested that the policy should include specific reference to sewer flooding and that developers should make proper provision for drainage to ground, watercourses or surface water sewers in accordance with the drainage hierarchy. Specific policy wording was proposed.
- It was suggested that canals could have a role in capturing excessive or surplus watercourse flows.

The **Environment Agency** supported the preferred option and suggested a number of specific amendments to the proposed draft policy text. They emphasised that the policy will need to take account of the findings of the Strategic Flood Risk Assessment (SFRA).

Natural England welcomed the inclusion of a policy relating to flood risk and drainage. They will review the new SFRA when it becomes available at Regulation 19.

Oxfordshire County Council highlighted that there is currently no information on how the sequential testing of sites will occur for sources of flood risk other than fluvial/main river flooding. The county council suggested that the reference to the Oxfordshire Local Flood Risk Management Strategy be removed from the policy and a more comprehensive list of information sources be provided within the SFRA.

Oxford City Council suggested a number of specific amendments to the proposed draft policy text and questioned whether grey engineering solutions are permissible on new development or whether green/natural solutions are prioritised. It was highlighted that SuDS may not always be appropriate.

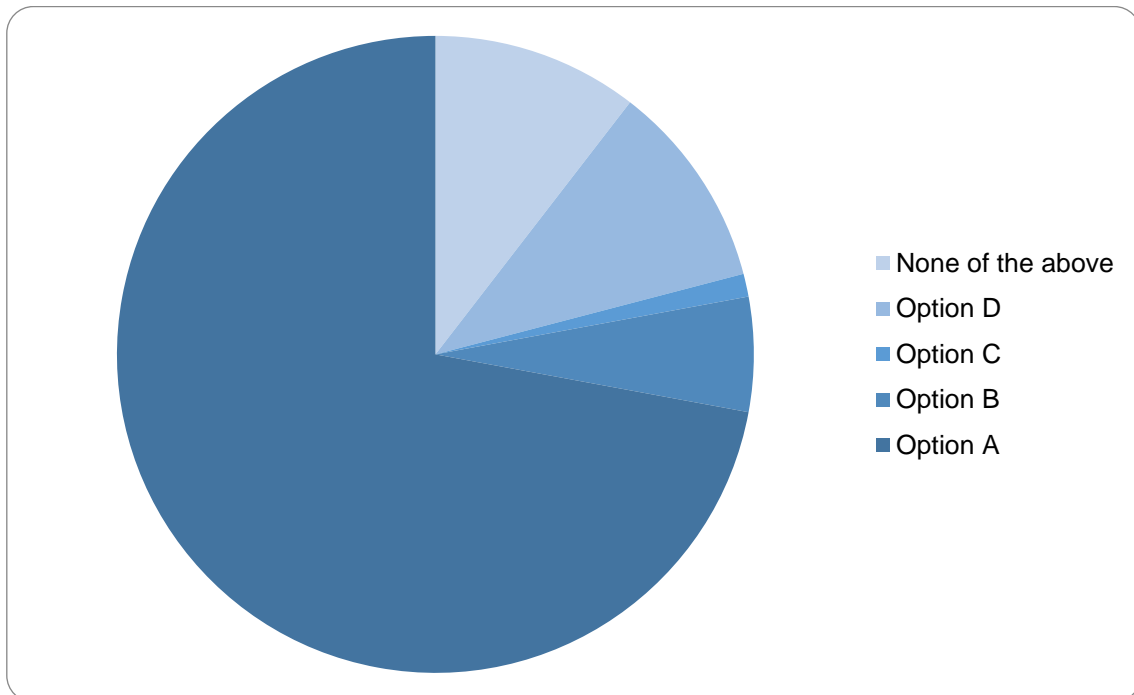
Sport England commented that playing fields, allotments and other usable green space should not be automatically located on flood plains as part of a larger development as they will be out of commission during winter months, sometimes for several weeks at time.

How the main issues have been taken into account

A number of amendments have been made to Policy CE6 in response to comments received, to reflect the recommendations of the Strategic Flood Risk Assessment, and to better align with national planning policy and guidance. Key changes include the strengthening of requirements for development in areas at risk of flooding and moving drainage requirements to Policy CE8.

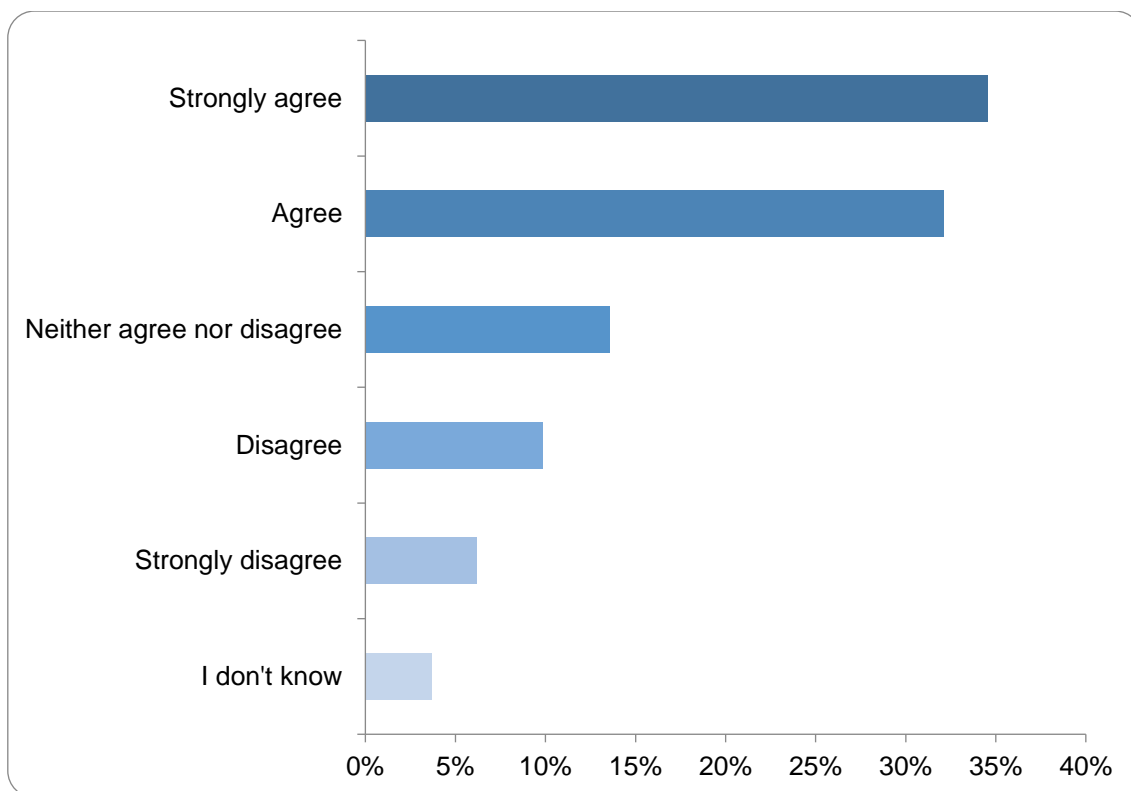
Policy CE7 – Water efficiency

Full Survey: Which option do you prefer?



Of the 86 people who responded to this question, 72% preferred Option A. 504 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 81 people who responded to this question, 67% either agreed or strongly agreed with the proposed draft policy wording. 509 people did not answer.

Full Survey: Summary of main issues raised

- Views on this policy were mixed - some supported the policy, some saw it as overly prescriptive, and others felt it should be stronger.
- There were concerns that the proposed water efficiency standard of 100 litres per person per day for new dwellings is not consistent with the Building Regulations or planning practice guidance and there is a lack of evidence to justify such an approach.
- There were some requests to set an even more ambitious water efficiency standard (such as 80 or 90 litres per person per day) and to apply the standard not only to new dwellings, but to extensions and renovations too.
- Thames Water expressed support for applying a 110 litres per person per day standard in accordance with national planning guidance.
- Thames Water noted that the Building Regulations allow water efficiency requirements to be achieved through either the 'Calculation Method' or the 'Fittings Approach', with the Fittings Approach being most effective.
- It was suggested that the policy is too focused on new dwellings and does not give appropriate consideration to water efficiency in other types of development.
- More information on requirements related to schemes such as BREEAM was requested.
- It was suggested that the requirement for development to 'strive to maximise water efficiency as far as possible' lacks clarity and more specific targets

should be set. A potential conflict between this requirement and Policy CE8 was also flagged.

- It was highlighted that new development will put more strain on water supplies.
- There was some support for alternative Option D, to explore the potential for community-scale rainwater harvesting and grey water recycling schemes. It was also suggested that these approaches should be considered for all scales of development, not just site allocations and other major development.

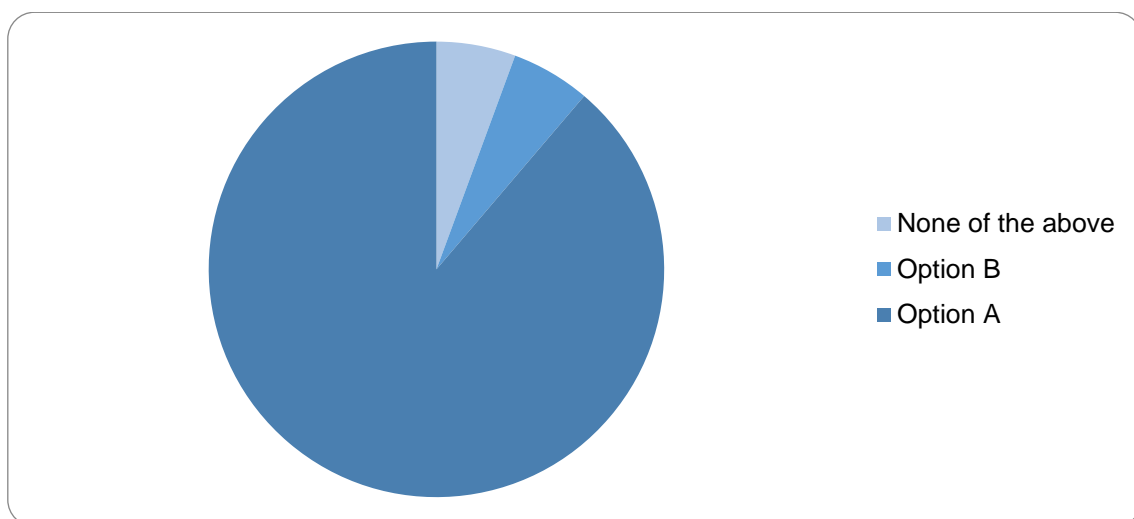
Oxfordshire County Council was supportive of more ambitious water efficiency standards, partly because reductions in water use helps to reduce the need for strategic water resource infrastructure such as the proposed reservoir near Abingdon.

How the main issues have been taken into account

Given significant pressures on water resources in the districts, Policy CE7 has retained its ambitious approach to water efficiency, including a water efficiency standard of 100 litres per person per day for new dwellings. Additional evidence has been produced to justify this approach and it has been subject to viability testing. A number of minor amendments were made to the policy for clarity.

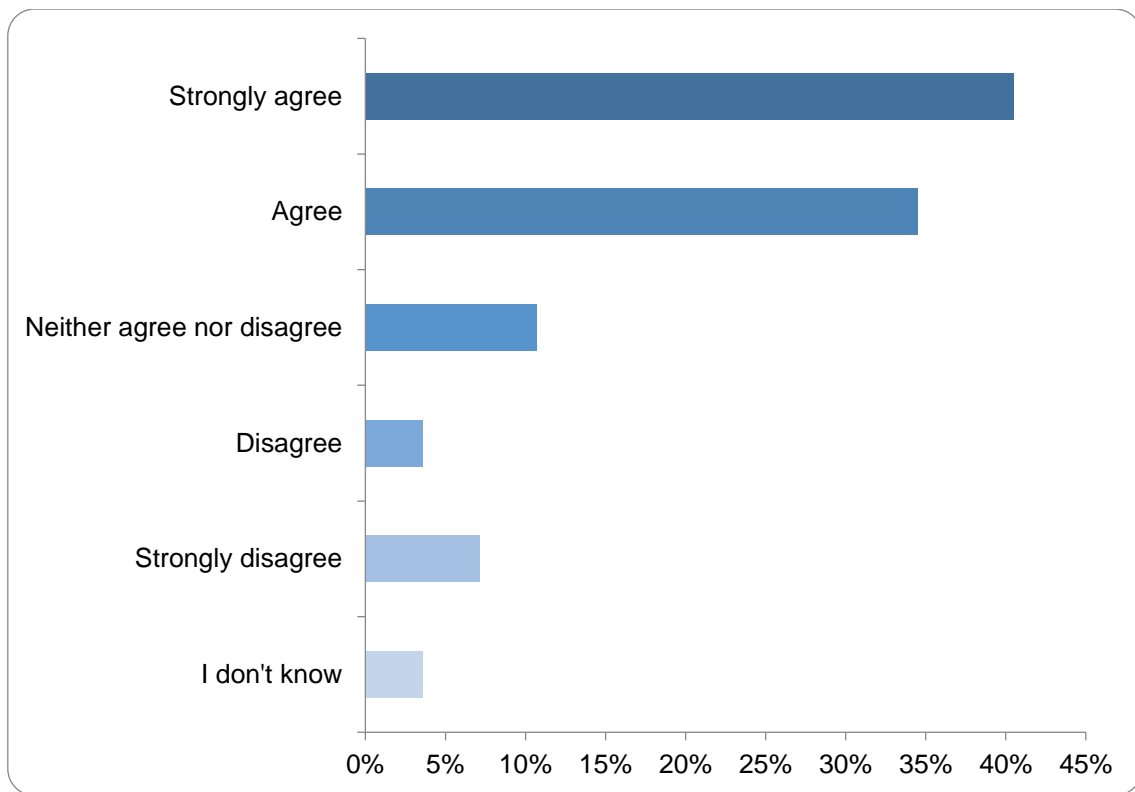
Policy CE8 – Water quality and wastewater infrastructure

Full Survey: Which option do you prefer?



Of the 89 people who responded to this question, 89% preferred Option A. 501 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 84 people who responded to this question, 75% either agreed or strongly agreed with the proposed draft policy wording. 506 people did not answer.

Full Survey: Summary of main issues raised

- The importance of protecting/restoring water quality was emphasised.
- Significant concerns were raised about current and future wastewater infrastructure capacity and the use of storm overflows.
- There was support for ensuring development and wastewater infrastructure delivery are aligned, however it was suggested that the proposed use of conditions may not meet the requirements of paragraphs 55-57 of the NPPF.
- There were suggestions that existing water quality and/or wastewater infrastructure issues should be resolved before new development is considered.
- It was suggested that it is unreasonable to require Sewage Capacity Assessments to be submitted as part of planning applications as sewage capacity is not the legal responsibility of the developer and this requirement could impact delivery. Instead, it was suggested that the councils should set out more clearly how they are working with Thames Water and the Environment Agency to plan for future demand.
- Thames Water stated that the time required to deliver new/upgraded infrastructure should not be underestimated. They also suggested a number of specific amendments to the policy text.
- There was some support for removing reference to specific legal requirements (alternative Option B).

- Potential duplication/conflicts were identified between criteria one of the proposed draft policy and other proposed draft policies, such as CE6, CE7 and IN1.
- It was suggested that greater consideration should be given to the impacts of road runoff on watercourses.

The **Environment Agency (EA)** identified significant capacity issues at sewage treatment works within the plan area and stated that an updated Water Cycle Study should be undertaken as soon as possible. The EA suggested that information on SuDS should be added to the supporting text and that potential impacts on water quality from roads should be highlighted, with mitigation proposed to address impacts. The EA also stated that in Part 7 of the draft policy the words 'where appropriate' should be removed.

Natural England (NE) will review the Water Cycle Study at the next stage of consultation. NE would expect further consideration of water sensitive designated sites such as the River Lambourn Special Area of Conservation (SAC), Cothill Fen SAC, wetland-based habitats (including peatlands) and nature based solutions.

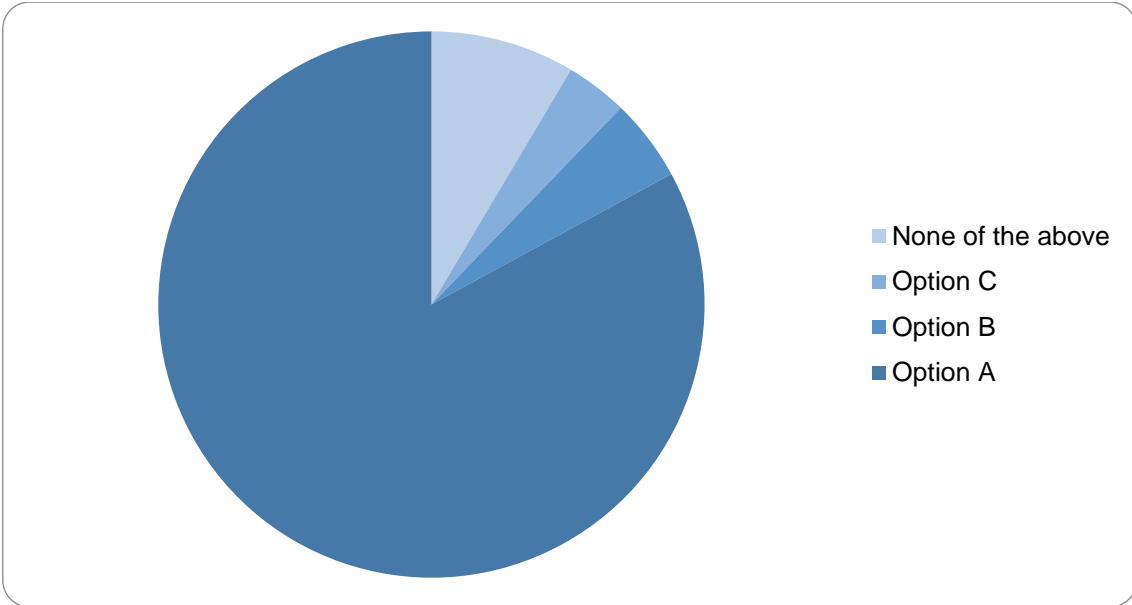
Oxfordshire County Council welcomed the incorporation of SuDS into the policy wording, suggested that 'green infrastructure' should be re-badged as 'blue-green infrastructure', and asked that the supporting text clarifies that waste treatment facilities are a county matter.

How the main issues have been taken into account

Policy CE8 has retained its strong focus on protecting and enhancing water quality and ensuring that development and wastewater infrastructure upgrades are aligned. An additional requirement was added to the policy to address road runoff issues. The policy now also sets out more comprehensive drainage requirements, with some of these requirements moved over from Policy CE6. We have undertaken a Water Cycle Study to assess the likely impacts of the Joint Local Plan on a range water-related issues, including on wastewater infrastructure capacity and water quality.

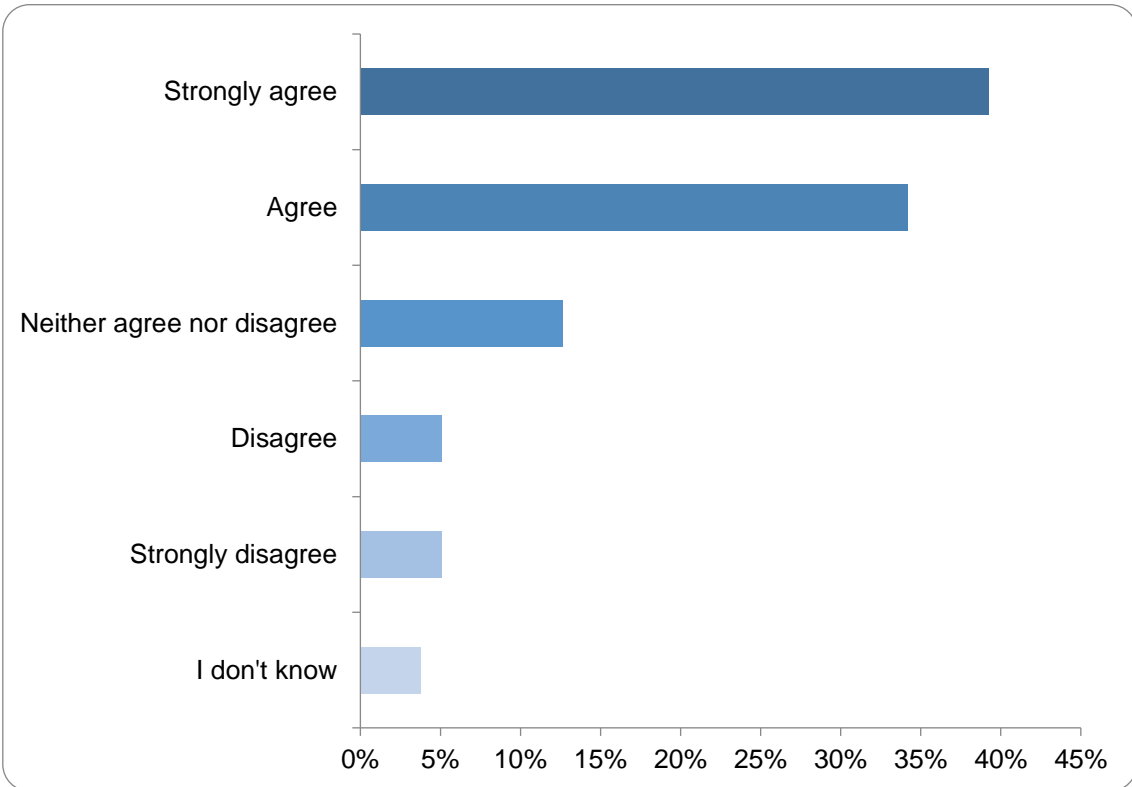
Policy CE9 – Air quality

Full Survey: Which option do you prefer?



Of the 82 people who responded to this question, 83% preferred Option A. 508 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 79 people who responded to this question, 73% either agreed or strongly agreed with the proposed draft policy wording. 511 people did not answer.

Full Survey: Summary of main issues raised

- There was general support for the proposed draft policy.

- The importance of protecting and enhancing air quality and the benefits for human health were emphasised.
- It was suggested that there should be no development in AQMAs until air quality issues are resolved.
- Specific concerns were raised about air quality in Didcot.
- Many comments focused on the need to address transport issues as one of the main causes of air pollution in the districts. Concerns were raised about development in rural areas increasing car dependency, a lack of realistic alternatives to car use, and levels of commuting. However, it was also highlighted that cars are becoming cleaner.
- It was suggested that the policy should be more specific about the measures developers will be expected to implement to protect and enhance air quality and that implications for development viability need to be considered.
- There was support for using green infrastructure and nature-based solutions to protect and enhance air quality.
- It was suggested that the policy should include mandatory compliance with NICE Guidelines on air pollution.
- It was suggested that requiring air quality assessments for all major developments may not be proportionate, as each development is unique and some schemes may not have adverse impacts on air quality.
- It was suggested that there should be greater emphasis on particulate levels.

Oxfordshire County Council supported the proposed draft policy and requested that the supporting text makes reference to the Oxfordshire County Council Air Quality Strategy 2023-2050.

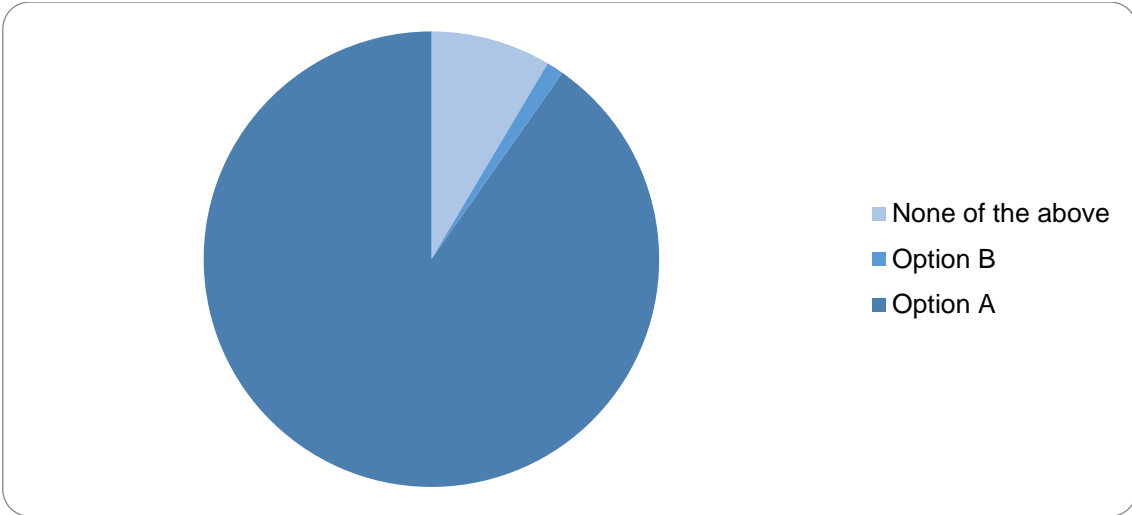
Oxford City Council questioned the reference to ‘appropriate green infrastructure’ within the proposed draft policy and requested further clarification.

How the main issues have been taken into account

General support for Policy CE9 was noted. It is recognised that air quality and transport are closely linked. Other policies in the Joint Local Plan support sustainable travel and will have benefits for air quality. Supporting text has been added to provide more detail on the districts’ AQMAs, the councils’ Air Quality Developer Guidance and use of green infrastructure.

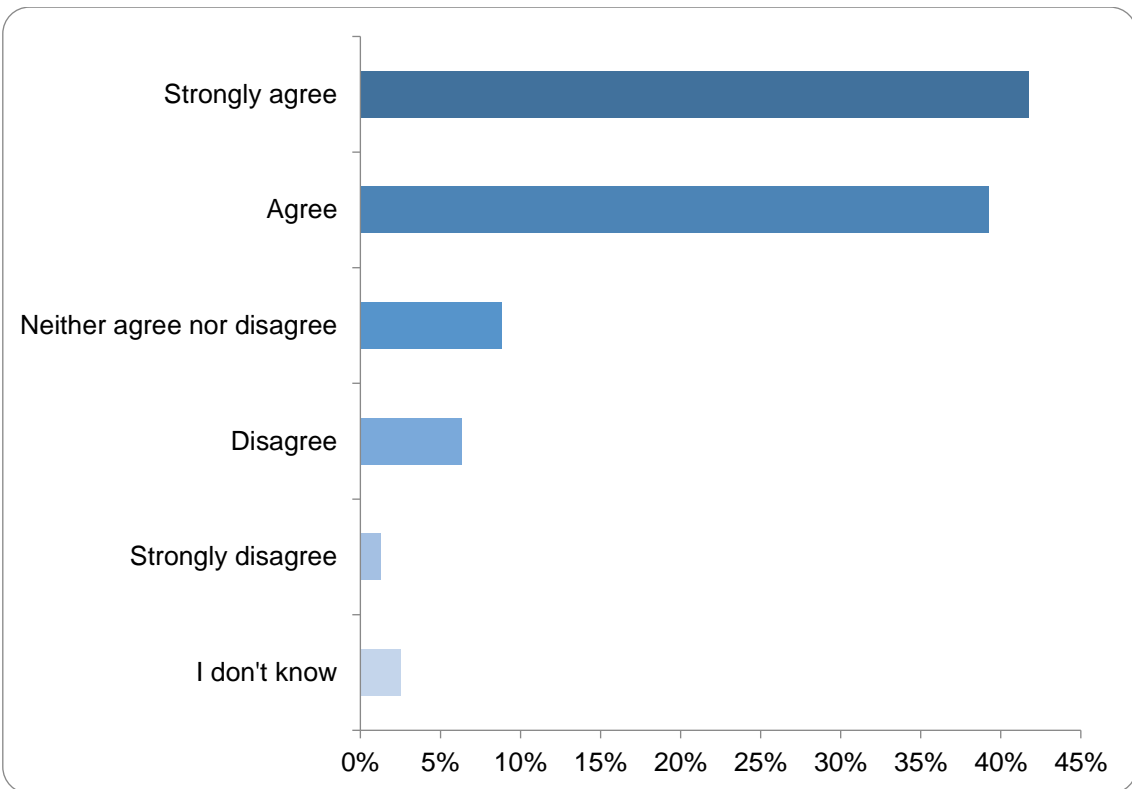
Policy CE10 – Pollution sources and receptors

Full Survey: Which option do you prefer?



Of the 82 people who responded to this question, 90% preferred Option A. 508 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 79 people who responded to this question, 81% either agreed or strongly agreed with the proposed draft policy wording. 511 people did not answer.

Full Survey: Summary of main issues raised

- The majority of respondents voiced their support for Option A, with respondents welcoming the recognition of the inherent risk of pollution to human health and wellbeing, as well as on the natural environment.

- Support was provided for the reference to light pollution in the proposed policy wording, and the link to Policy CE11 (Light pollution and dark skies).
- There was concern raised that the policy could potentially limit the scope for development around major roads that have high noise pollution levels.
- A query was raised regarding the section of the proposed policy that relates to Nuclear Restoration Services (NRS) Harwell, and whether such policy requirements would still be necessary after the relevant facilities on site are decommissioned. A respondent also raised that they did not believe they needed to consult ONR when proposing to develop land that is delicensed or never part of the delicensed site.
- Some respondents wanted further clarity regarding what levels of pollution would be acceptable, and if thresholds could be included in the policy for sources of pollution such as dust and gases. On the other hand, some respondents considered that as each development is unique it is difficult to set thresholds for assessments.
- The relationship between watercourses and pollution was also raised by respondents, asking if the policy can more explicitly recognise this link.

Historic England objected to the policy as currently drafted and raised concerns that Part 4 does not mention the historic environment. A proportion of pollution cases will need to consider the impact of development on the historic environment. Minor edits to the policy were proposed.

The Nuclear Decommissioning Authority and Nuclear Restoration Services welcomed the inclusion of this policy, including the 'Agent of Change' principle within it and the specific reference to the Harwell site. They noted however that not all of Harwell Campus is subject to a Nuclear Site Licence (NLS) and therefore it would not be appropriate to consult the Office for Nuclear Regulation (ONR) outside the boundary of the NLS. They proposed an amendment to the policy text to address this.

Oxfordshire County Council noted that the successful control of pollution and noise requires persistent measurement over time and noted that consideration should be given to the location of mounted sensors that control pollution. The estates team raised that they control Harwell Primary School which lies within the Outer Consultation Zone (OCZ) for the Nuclear Restoration Services (NRS) Harwell and requested clarity regarding what groups would be considered vulnerable, as set out in criteria c of the policy.

Thames Water proposed specific wording to be added requiring the developer or local authority to liaise with Thames Water as to whether an odour impact assessment is required to be submitted as part of a planning application where a site lies within 800m of a sewage treatment works or 15m of a sewage pumping station.

How the main issues have been taken into account

We recognise that Oxfordshire County Council requested clarity regarding what groups would be considered vulnerable under Part 10(c) of the policy. However, the referral criteria set out in Part 10 of the policy reflects that set by ONR, who do not

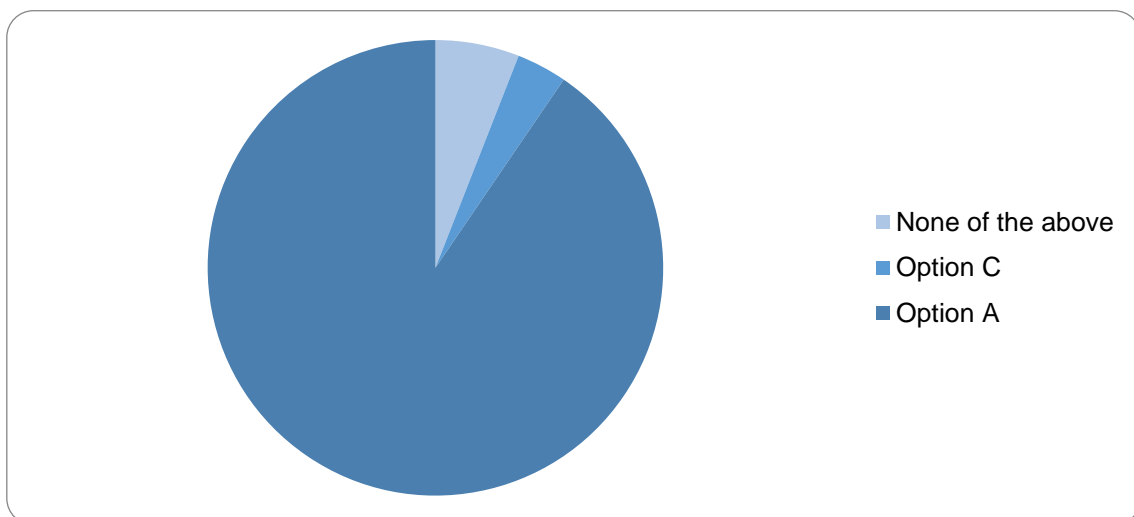
go into greater detail about what groups this applies to other than stating they are vulnerable. Therefore, we think this will be best decided on a case-by-case basis. We note that some respondents have asked for the policy to more explicitly recognise the link between watercourses and pollution, however as we have a specific policy (Policy HP10) covering watercourses which includes protecting these from pollution, it is not necessary to have explicit wording in this policy as well. We recognise the concern raised that the policy could potentially limit the scope for development around major roads that have high noise pollution levels, however the policy allows for mitigation measures to be put in place to address pollution impacts, including noise impacts. Therefore, we don't consider this policy to be unduly restrictive.

Policy changes include:

- We recognise that not all of Harwell Campus is subject to a Nuclear Site Licence, and therefore policy wording has been amended to ensure it only requires development proposals to be referred to ONR where they sit within the boundary of the NRS Harwell nuclear licensed site.
- Part 4 of the policy has also been amended to include references to the historic environment addressing the concern raised by Historic England, as we agree pollution can adversely affect it.
- The supporting text for the policy includes wording proposed by Thames Water regarding considering whether an odour impact assessment is required for developments within 800m of a sewage treatment works or 15m of a sewage pumping station.

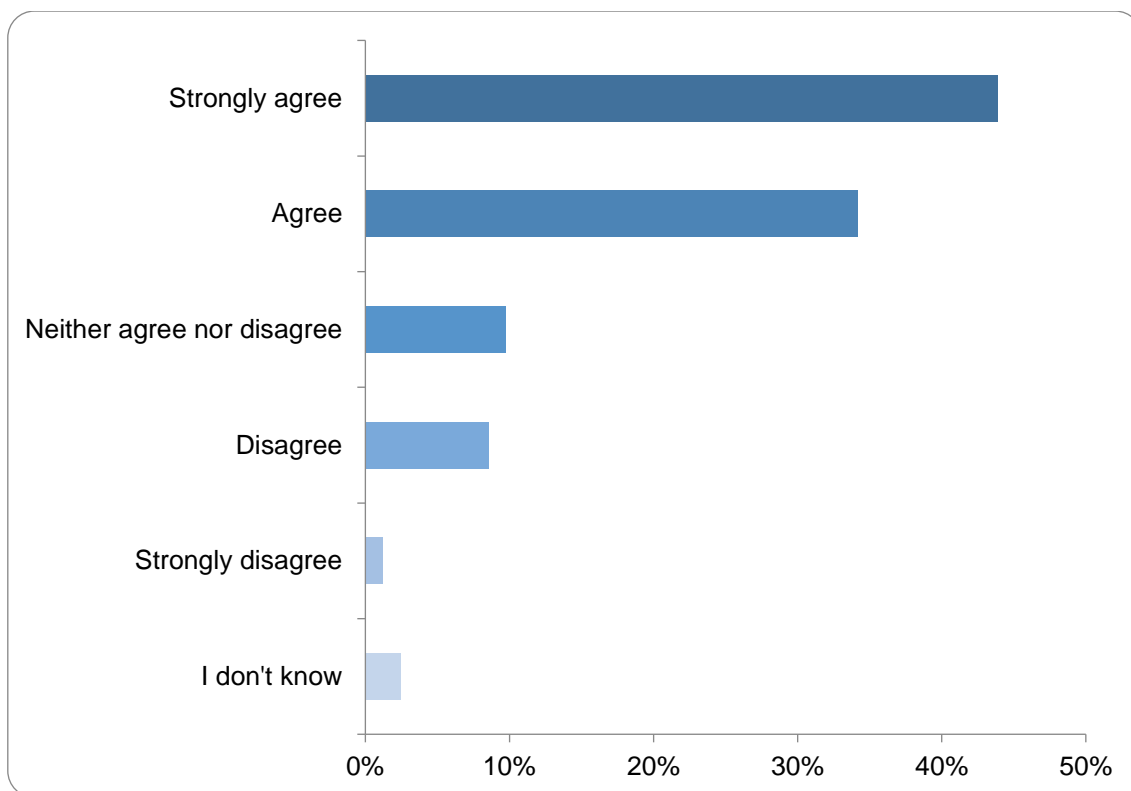
Policy CE11 – Light pollution and dark skies

Full Survey: Which option do you prefer?



Of the 84 people who responded to this question, 90% preferred Option A. 506 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 82 people who responded to this question, 78% either agreed or strongly agreed with the proposed draft policy wording. 508 people did not answer.

Full Survey: Summary of main issues raised

- There was broad support provided for Option A, with respondents largely supporting the proactive approach to preserving and enhancing dark skies and welcoming the recognition of the importance of reducing light pollution in terms of wildlife and landscape. On the other hand, some respondents thought it could be too restrictive and goes beyond national policy, therefore preferring Option C instead.
- Several respondents raised the point that lighting is required for safety, and therefore a balance needs to be struck between lighting for safety and minimising light pollution.
- Some concerns were raised regarding the proposed policy requirements relating to external glazing (in Part 5 of the proposed policy), with some questioning if it would restrict the permission of greenhouses or conservatories in some areas, and whether light spill can be addressed adequately by seeking design mitigation instead, rather than setting out prescriptive policy requirements on glazing. It was also raised that the developer nor the council have control over how residential dwellings are occupied following completion, and it should be recognised that occupants can cause interior light spill post occupancy.
- Alternatively, another respondent stated that the requirements set out in Part 5 should not be restricted to just applications within Environmental Zone E1, as the cumulative light pollution from other areas can have a wider impact.

- Regarding the proposed policy wording (in Part 5(e)) which requires the avoidance of high impact commercial greenhouses in Environmental Zone E1, it was raised that a balance will need to be had between controlling such greenhouses and the benefits of securing affordable foods.
- Another respondent suggested that not only high impact commercial greenhouses should be avoided within the dark light environmental Zone E1, but equivalent structures such as polytunnels should also be avoided.
- Some concerns were raised that this policy could impact the viability of new developments, and the Joint Local Plan evidence base should consider this.
- A respondent highlighted that proposed policy Part 5(a) which states that glazing should not exceed 25% of the wall area contradicts Part 5(b), which states that more than 50% glazing on a single elevation should be avoided. They proposed that either we refer to more than 25% as being large or remove the size threshold from Part 5(b).
- The benefit of minimising lighting requirements in terms of increasing energy conservation was raised.

Sports England raised that a balance needs to be made regarding sports lighting. They raised that in order to achieve healthy communities, sports lighting is required to allow evening use of sports facilities. Therefore, they suggested that applicants should be encouraged to highlight the social benefits of introducing sports lighting as part of their technical submission.

North Wessex Downs National Landscape (AONB) welcomed the reference to the North Wessex Downs lighting position statement and good light guide.

Oxfordshire County Council expressed their support for Option A, noting the importance of protecting dark skies for nature conservation. They requested that the councils consider whether the County Council's street lighting and illuminated assets policy should be referenced in supporting text or policy. They also raised that the North Wessex Downs External Lighting Guide should be considered for all developments in the districts, not only those in the National Landscapes.

Thames Water, Affinity Water and Southern Water noted that providing certain illuminance levels can in some cases be required for security or for health and safety, particularly in the context of operating infrastructure that must function during the day and night.

How the main issues have been taken into account

We recognise the concerns raised by respondents regarding the necessity of lighting in certain situations, including for sports, security, safety and operational reasons. We do not consider the policy to restrict the use of lighting in these scenarios, but in these cases where it is demonstrated that there is a clear need and justification for lighting, the policy sets requirements to ensure developments are designed to minimise light pollution where possible. We also agree that securing affordable foods is important, and commercial greenhouses can be used by the food industry. However, due to the significant light pollution they can cause they should be avoided in dark sky areas (E1 zones) where they would emit significant amounts of light at

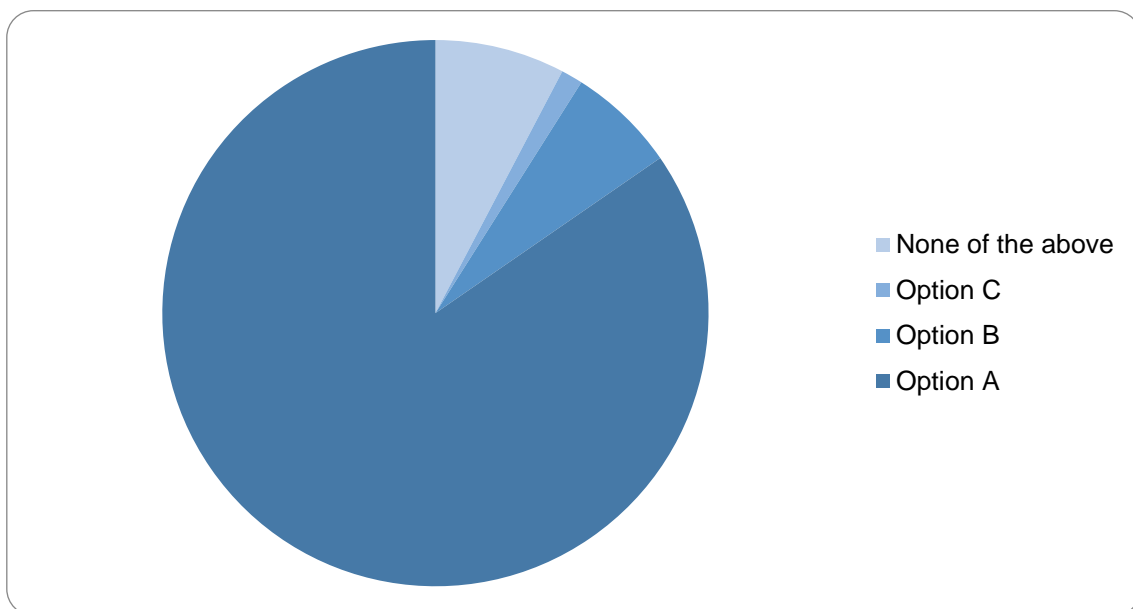
night, and therefore this element of the policy is retained. We note Oxfordshire County Councils recommendation to consider whether their street lighting and illuminated assets policy should be referenced. However, this has been referenced in our Lighting Design Guide which is published alongside the Regulation 19 publication version of the plan and will be referred to by applicants when considering lighting proposals. We consider the reference within the Lighting Design Guide to be adequate.

Policy changes include:

- We agree that Part 5(a) and Part 5(b) lacked clarity, and therefore the wording has been amended to remove the reference to 'more than 50% glazing on a single elevation' at Part 5(b).

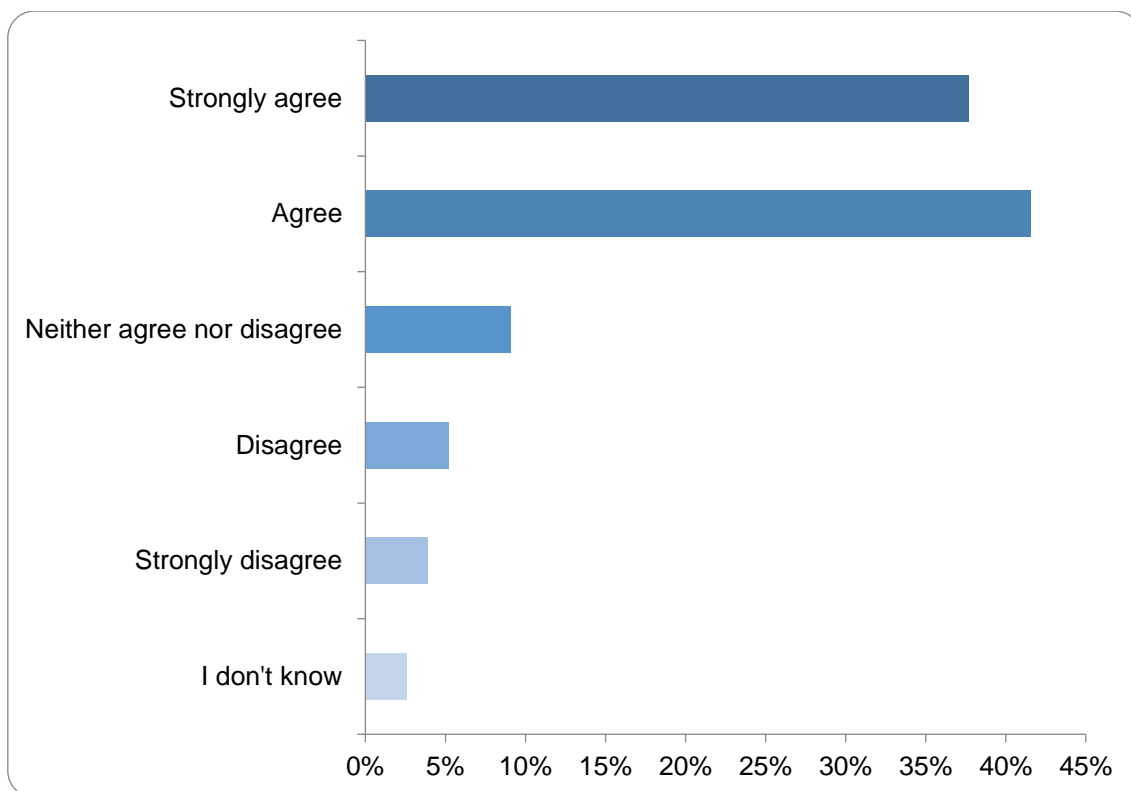
Policy CE12 – Soils and contaminated land

Full Survey: Which option do you prefer?



Of the 78 people who responded to this question, 85% preferred Option A. 512 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 77 people who responded to this question, 80% either agreed or strongly agreed with the proposed draft policy wording. 513 people did not answer.

Full Survey: Summary of main issues raised

- There was support for the protection of agricultural land, particularly given the need to ensure food security and to reduce food air miles.
- There were suggestions that soils should not be disturbed at all.
- There was significant concern from developers that proposed draft policy requirement 1a would introduce a sequential test for agricultural land which conflicts with national planning policy and would be onerous and unreasonable. There were requests for this to be removed.
- It was suggested that requirements to consider the use of soil on site (proposed draft policy Part 1(c)) add unnecessary detail.
- It was suggested that that soils of high biodiversity value should also be protected.
- Specific policy protections for peat were requested due to its importance as a carbon store.
- It was suggested that local policy requirements on land stability (alternative Option C) may be required in a changing climate.
- There was some support for alternative Option B, to require soil surveys and soil management plans.
- It was suggested that having a separate policy on contaminated land may be clearer.

- It was suggested that a Phase One Contaminated Land Preliminary Risk Assessment should only be required where evidence exists to suggest that land contamination may be an issue.

The **Environment Agency** want to ensure that proposed development (particularly proposed allocations) situated above a principal/secondary aquifer does not pose any unacceptable risks to the water environment.

Historic England questioned whether peat has been specifically considered, as this could have implications for carbon, biodiversity and heritage.

Natural England advised that the best and most versatile agricultural land should be protected and suggested specific policy wording. Natural England supported the inclusion of a policy focused on the protection and sustainable management of soils, which would help to ensure that soil disturbance is minimised and as many ecosystem services are retained as possible. They also flagged that soils of high environmental value (such as wetlands and peat) have an important role in supporting ecological connectivity.

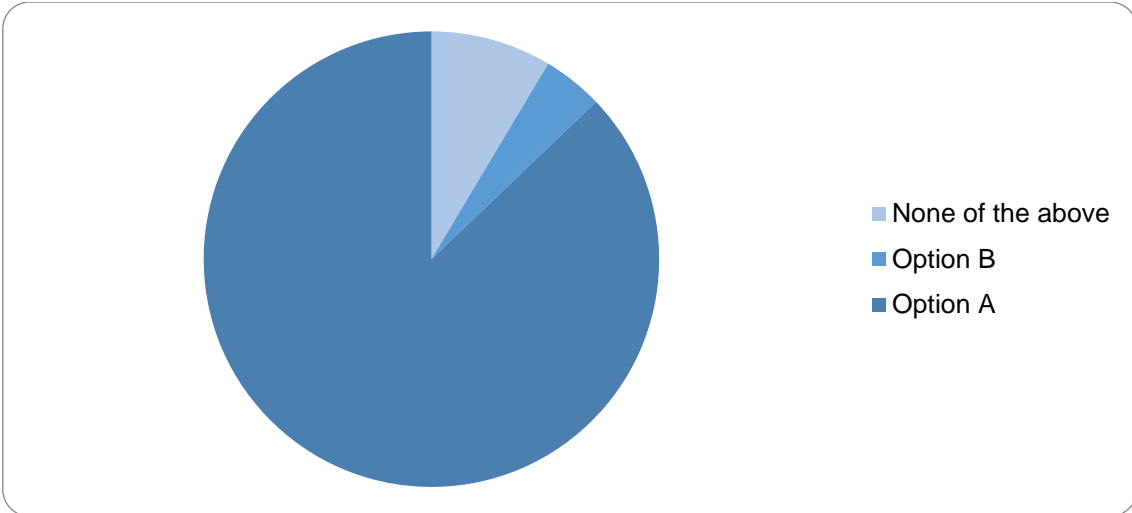
Oxfordshire County Council was pleased to see the inclusion of the re-use of soil on-site and supported the intention of the policy. However, they suggested that the policy should specify “to avoid the need to manage waste off-site.” If the soil leaves the site, it will become a waste arising and if permanent deposit of the soil on another site takes place on a site that is not restoring a former quarry it would be considered landfilling. The management or disposal of the waste off-site would be a county matter.

How the main issues have been taken into account

Policy requirements related to agricultural land were amended in line with Natural England’s advice. Additional text was added to Policy CE12 to recognise the many benefits provided by soils and to protect soils of high environmental value. Amendments were made to requirements relating to the use of soils off-site in accordance with Oxfordshire County Council’s comments. Additional requirements on land stability were added to the policy, including reference to South Oxfordshire District Council’s Karst Susceptibility Hazard Map.

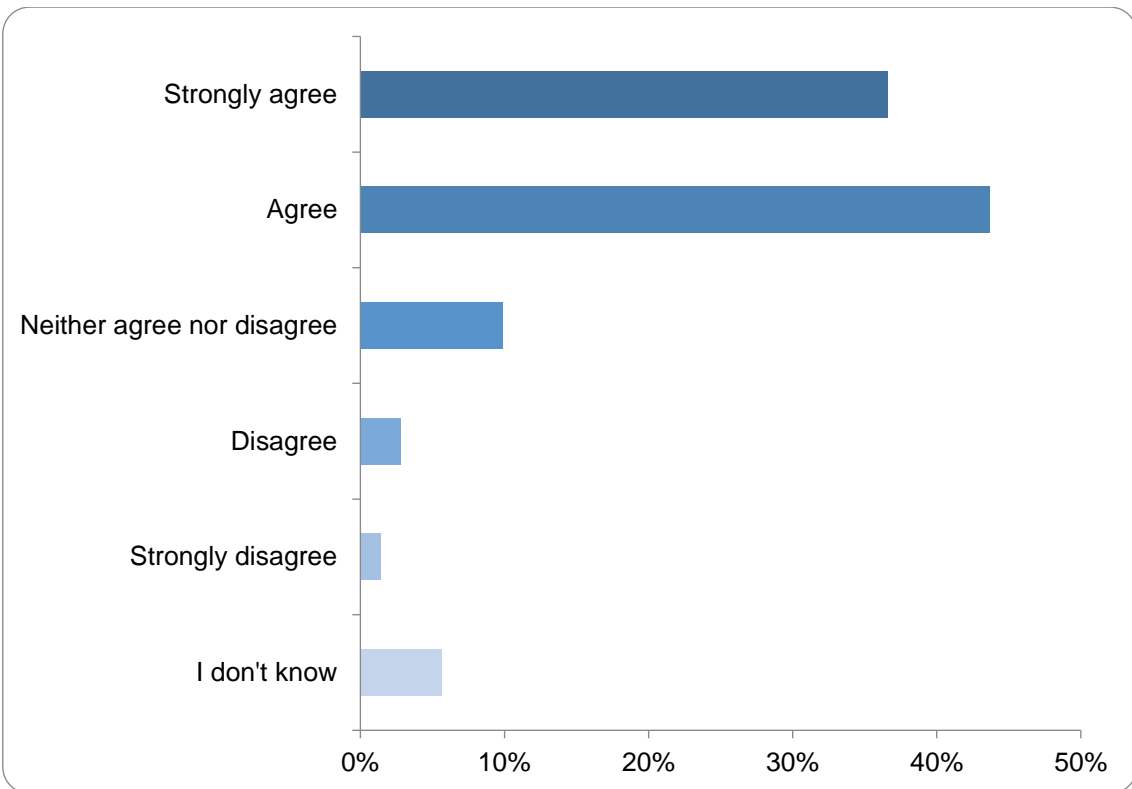
Policy CE13 – Minerals safeguarding areas

Full Survey: Which option do you prefer?



Of the 70 people who responded to this question, 87% preferred Option A. 520 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 71 people who responded to this question, 81% either agreed or strongly agreed with the proposed draft policy wording. 519 people did not answer.

Full Survey: Summary of main issues raised

- Overall, there was support for the draft policy and it was seen as being in accordance with national planning policy and guidance.

- It was suggested that the policy wording should be amended to align with Policy M8 of the Minerals and Waste Core Strategy.
- It was suggested that the policy may need to be reviewed in the future as new Minerals and Waste Local Plan documents are adopted.
- It was requested that where currently safeguarded land does not meet the criteria for safeguarding, and/or where it is demonstrated that the land is not likely to be commercially viable as an extraction operation, Policy CE13 should support non-mineral development in principle.
- There was a request for specific land to be removed from a minerals safeguarding area.
- It was suggested that minerals resources outside of minerals safeguarding areas also need to be considered.
- It was suggested that mineral consultation areas should also be shown on the Joint Local Plan policies map.
- It was suggested that Policy CE13 should also refer to the safeguarding of minerals infrastructure.

Oxfordshire County Council (OCC) stated that the draft Policy CE13 partly replicates Policy M8 of the Oxfordshire Minerals and Waste Local Plan and this could cause conflicts. OCC suggested that district local plan policies do not need to replicate what is in legislation. OCC recommended that draft Policy CE13 is not included in the Joint Local Plan.

How the main issues have been taken into account

The overall support for Policy CE13 was noted. It is considered helpful to retain this policy in the Joint Local Plan. Policy CE13 has been amended to more closely align with Policy M8 of the Oxfordshire Minerals and Waste Local Plan and national planning policy and guidance to avoid potential conflicts.

Other general comments regarding Chapter 4: Climate change and improving environmental quality

Full Survey: Summary of main issues raised

- One respondent commented to ensure appropriate mitigation to any noise impacts arising from heat pumps.
- One respondent commented that the development management team would not be sufficiently resourced or qualified to implement technical climate policies.
- Oxfordshire County Council stated that Policies CE1-5 provide a clear and positive framework to mitigate and adapt to the impacts of climate change in the districts, and they make significant strides towards the net zero transition. They also provided recommendations on the CE policies, including merging CE1 with CE2 and CE3 with CE4, reducing the number of assessments these policies require, and incorporating policy sub criteria in Policies HOU8, NH13 and DE1. They recommended that PAZCO and Oxfordshire Net Zero Roadmap and Action Plan is mentioned to help set the scene, and also noted

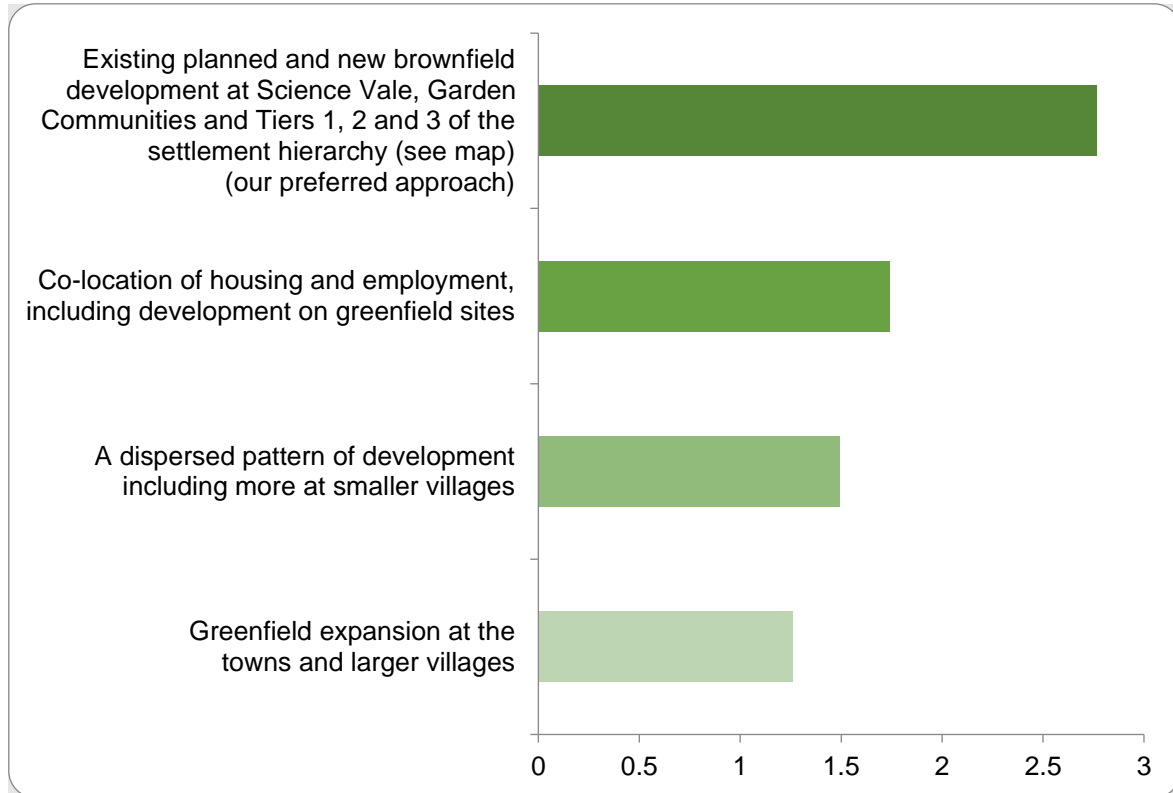
that the plan should make reference to future Local Area Energy Plans (LAEPs).

How the main issues have been taken into account

Chapter 4 has been reviewed and some changes have been made to improve the legibility of the chapter and to streamline the policy requirements. Training and support will be provided to development management officers to ensure they are able to process planning applications in accordance with any new policy requirements. All applications would be required to comply with Policy CE10 (Pollution sources and receptors) which addresses noise pollution. The supporting text to Policy CE5 (Renewable energy) has been updated to reference local area energy planning.

Spatial strategy and settlements

Nutshell (Section 6): What kind of spatial strategy do you think we should adopt? Please rank from 1 to 4, with 1 being your preferred approach and 4 being your least preferred.



Nutshell (Section 6): Other comments on where development will go

190 people answered this question.

The highest number of comments received in response to this question were regarding the need to not build on, and protect, the Green Belt. Instead, respondents felt brownfield sites should be used instead. Some respondents highlighted the need to protect agriculture so we can continue to produce our own food.

With respect to the location of developments, respondents thought that housing needs to be placed in sustainable areas with good transport links and infrastructure. The co-location of housing and employment was supported. Some comments supported development that was dispersed, with a smaller number of respondents opposed to this principle. A number of respondents suggested no further growth should take place around villages, whilst others felt that there should be no more building in major towns. There was some support for small-scale development to support the sustainability of rural communities. In some instances, respondents felt there should be no more development as there is already far too much. Other comments suggested support for new development, particularly where it addresses a housing shortage (including affordable housing), delivers high quality design and the principle of 15-minute neighbourhoods.

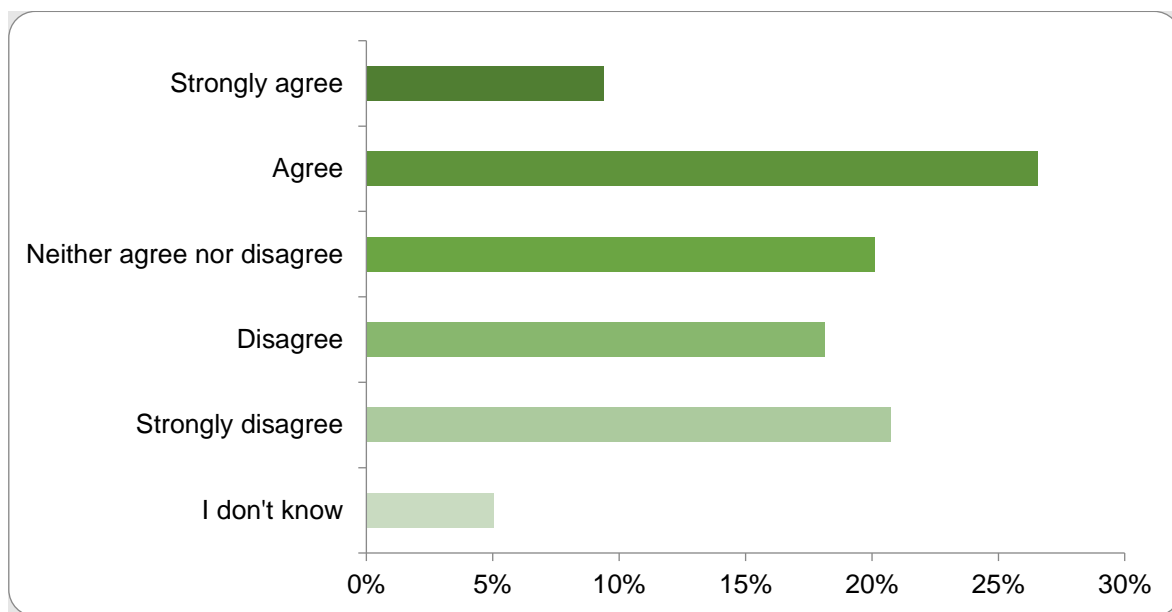
A number of respondents felt that infrastructure is a key consideration; it must be adequate and able to support proposed growth. Some respondents felt that no more homes should be provided until sufficient infrastructure is in place.

Other site constraints were raised, including flooding, environmental considerations, the preservation of green space and the impact on nature.

Specific reference was made in support and objection to the proposed spatial strategy, the development in certain areas of the districts (e.g., Didcot, edge of Oxford) and the allocated sites. With regards to the spatial strategy, respondents expressed support and suggested it should cover more than just housing, whilst others thought none of the options were appropriate.

A number of respondents either didn't understand the question or didn't feel they had enough information to answer. Some raised mapping queries including disagreement with the boundary for Science Vale.

Nutshell (Section 7): If a Town or Parish Council wanted to deliver more homes as part of their neighbourhood plan, how far do you agree or disagree with the Joint Local Plan including a strategy allowing allocation for further land for development?



Of the 617 people who responded to this question, 36% of people either agreed or strongly agreed with the Joint Local Plan including a strategy for allowing the allocation of further land for development through neighbourhood plans. However, 39% of people either disagreed or strongly disagreed. 65 people did not answer.

Nutshell (Section 7): Other comments on neighbourhood plans

191 people answered this question.

The largest number of respondents to this question highlighted the need for infrastructure to be sufficient to support new homes. A large number of respondents supported the principle of community led development, suggesting that if town or

parish councils and communities want housing (or employment), they should be allowed to decide, and to decide where it goes, because they know their areas and residents best. Neighbourhood planning was considered a democratic way to determine local priorities and represent local interests, which should be encouraged. In some instances, respondents felt that neighbourhood plans should be allowed to plan for less growth than proposed in the Joint Local Plan, whereas others thought they should not be allowed to plan for more growth than outlined in the Local Plan. Housing development should be based on an evidenced need. There were some comments that did not support the principle of neighbourhood planning or neighbourhood plans making housing allocations and suggested that local groups lack the skills to properly judge proposals.

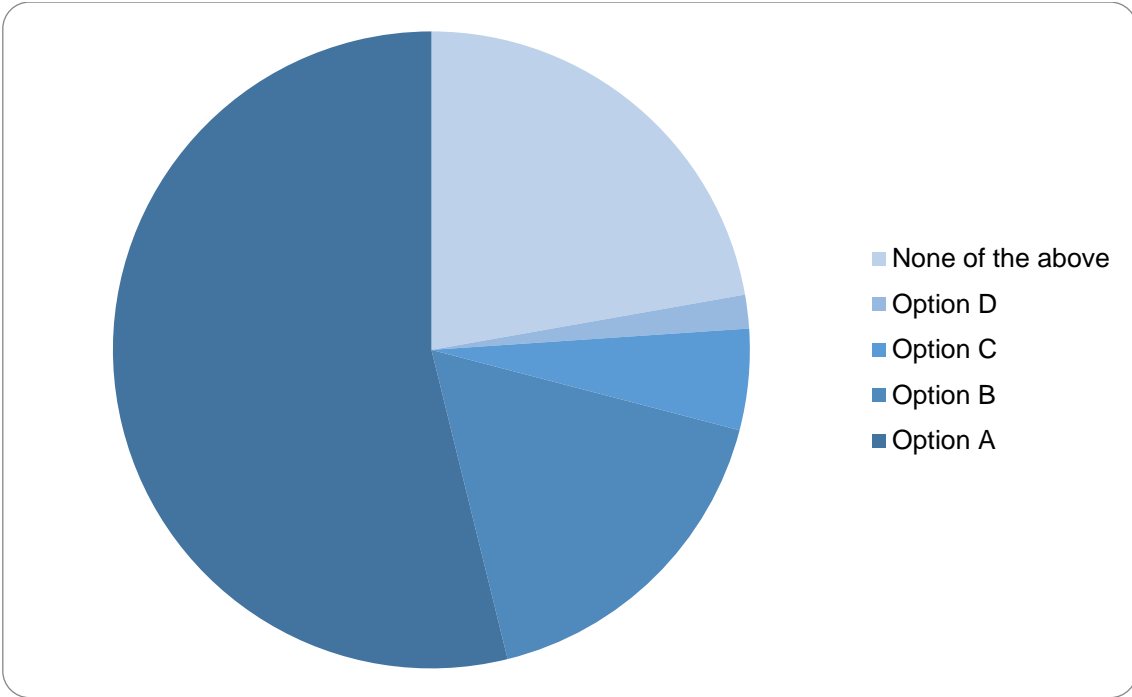
Some respondents suggested development should only take place on brownfield sites, and not on greenfield. There were also respondents who felt that there is enough housing already, and housebuilding should stop. In some instances, respondents believed that neighbourhood plans should focus on other issues instead of housing, which brings negative impacts.

A small number of respondents had previously participated in the neighbourhood planning process and felt disillusioned about the difference it made, the relationship between neighbourhood planning and the local plan, and the district council and community groups. Others felt it has been a positive for their communities. It was felt that the neighbourhood planning process should be transparent and include good consultation with communities, particularly where there is concern that Town/Parish Councils don't represent their communities.

Respondents felt that housing allocations in neighbourhood plans should be judged on a case-by-case basis to look at the impact of housing allocations, with support where it would help local people more (particularly where it delivers affordable housing and improvements to local infrastructure and traffic).

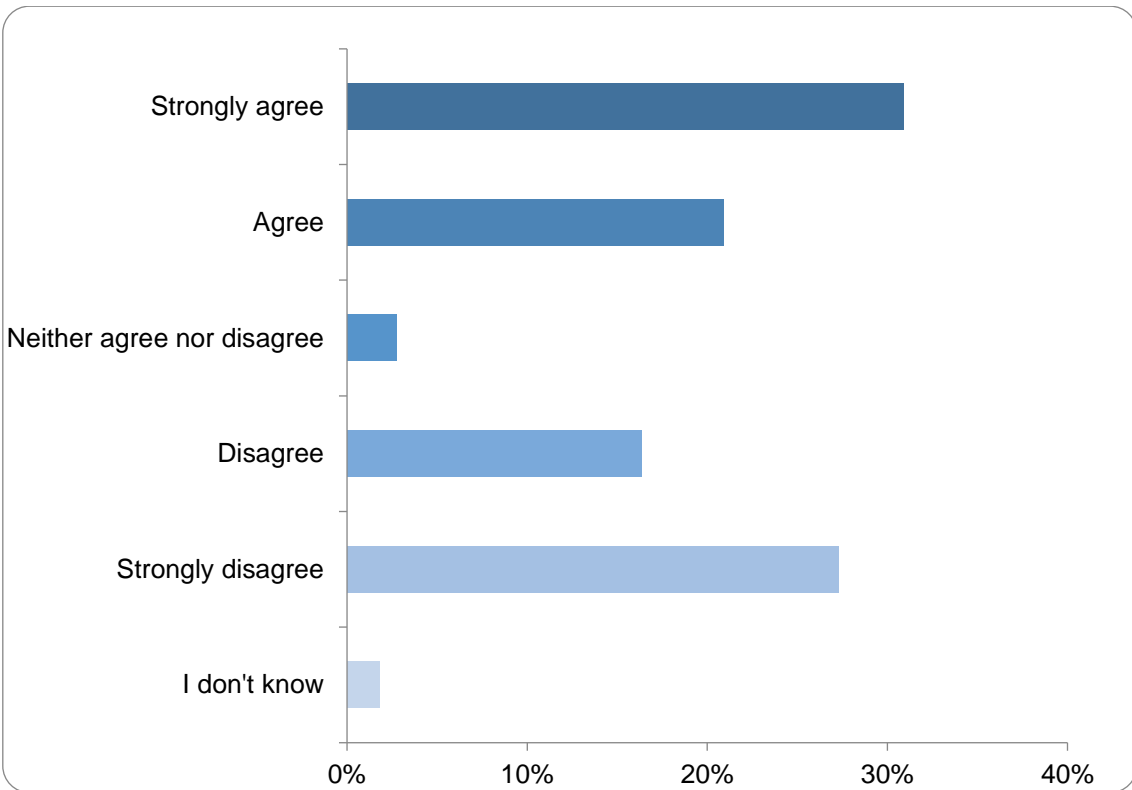
Policy SP1 – Spatial strategy

Full Survey: Which option do you prefer?



Of the 117 people who responded to this question, 54% preferred Option A. 473 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 110 people who responded to this question, 52% either agreed or strongly agreed with the proposed draft policy wording. 480 people did not answer.

Full Survey: Summary of main issues raised

- There was significant support for the preferred option (Option A), for protection of Green Belt and countryside including National Landscapes, for development in Science Vale, for co-location of jobs and homes, and prioritisation of brownfield land for development. Some respondents supported various blends of options.
- Respondents' criticisms of Option A were varied, including:
 - some supported guiding new development towards highly sustainable Tiers 1 and 2 because of access to services and infrastructure but criticised that little housing is proposed outside Tier 1 settlements and existing strategic allocations
 - that it won't deliver enough development particularly to cater for affordable need and elderly persons housing need,
 - that it will restrict economic growth
 - that it is too restrictive at sustainable places
 - that some current proposals do not accord with the strategy
 - that it increases the need to travel
 - that it does not support the longer-term growth and viability of settlement
 - that we should not leave so much to speculative growth and that it needs to be more plan-led
 - that it needs to be supported by a comprehensive infrastructure and connectivity plan
 - brownfield development generally delivers smaller homes (due to site constraints), and may not meet needs for family housing
 - Part 10 being too vague
 - that some specific sustainable greenfield sites are overlooked.
- Many respondents support Option B, greenfield expansion at Tier 1, 2 and 3 settlements. Respondents' reasons for supporting for this option included:
 - that sustainable sites should not be overlooked
 - that it provides more supply and choice and meets housing need
 - that risks of over-development have been amplified especially in a housing crisis
 - that it could still help achieve carbon neutrality
 - that it will better support employment
 - that small scale growth is critical for the vitality and viability and rural needs of Tier 3 settlements.
- Many respondents supported Option C to align housing and employment. Respondents' reasons for supporting for this option included:
 - that it will balance losses of housing or employment land in sustainable settlements
 - that it will support Oxford City in seeking unmet needs
 - that it will reduce the need to travel and support job creation
 - that it will support the transition to a net zero transport system.
- Some respondents supported Option D, but it received less support than other options, and reasons for supporting for this option included:

- that development at Tier 4 settlements enables smaller villages to maintain their vitality,
- that dispersed development balance the impacts of large-scale development on existing communities.
- There were mixed views about meeting Oxford's unmet housing need, some saying we should not carry on meeting previously agreed need, some saying we should not meet Oxford's claim for further assistance to meet more new housing needs and some saying we should meet Oxford's claim for further assistance to meet more housing needs critical that the JLP is not based on an up to date understanding of unmet need. One respondent said the rationale/implications for not considering Oxford's need are not explained in the JLP evidence base. Some respondents suggested the strategy should make more of South Oxfordshire's relationship with Reading and should help fulfil Reading's unmet need.
- Neighbourhood Plans - respondents mostly supported the strategy's aims for Neighbourhood Plans, however some felt that targets for development should be higher. It was also suggested there is an over-reliance on the use of Neighbourhood Plans, which isn't appropriate for strategic level growth.
- Employment and economic strategy - it was suggested we should emphasise the need for industrial units for SMEs in a range of types and sizes, encouraging start-ups, not just large enterprises. It was also suggested we make reference to the role of other key employment sites, such as Howbery Park. There was a suggestion that reliance on existing allocations will not bring houses forward quickly enough which will be a barrier to economic growth. Also a comment that there is a lack of detailed consideration as to where growth can be accommodated beyond the existing strategic employment sites, which will undermine the ability for economic growth to be achieved over the plan period.
- Green Belt - some respondents suggest there should be more Green Belt release and some asked for a separate policy on the Green Belt. Two respondents wanted reinstatement of land that was previously removed from the Green Belt. One respondent wanted a review of the Green Belt to ensure it continues to serve Green Belt purposes. It was suggested the policy should provide guidance on brownfield sites in the Green Belt.
- Delivery - many respondents raised concerns about past and recent development at the main towns with infrastructure not keeping pace with the rate of growth or coming forward piecemeal. Didcot and Science Vale were of particular concern, especially raising an issue if HIF1 infrastructure isn't delivered and making points about impact on Abingdon from future development near Culham. There was a suggestion that we should consider a Green Belt around Didcot, and some said villages around Didcot should be referred to in Policy. One respondent said the strategy doesn't enable an integrated approach to considering connectivity and nature. However conversely, some felt that sustainable settlements should include new allocations. Some respondents raised concern about the ability to deliver significant development on brownfield land owing to the limited number of

potential sites. Some also suggested the strategy does not indicate how sustainable growth will be delivered for all settlements. Allocation of some smaller sites was suggested to mitigate delivery problems that might arise because of overreliance on large allocations. There was also a suggestion that the strategy fails to recognise the need for a range of site types and sizes to fulfil a sustainable development trajectory across the plan period.

- Clarity of policy - Some respondents noted that Policy SP1 does not provide a clear indication of, and justification for, what the proposed strategy is. Comments also suggested clarification is needed about definitions of terms like windfall, infill, temporary uses, rural exceptions sites. There was a suggestion of limiting development of brownfield sites to brownfield register sites only. There was concern raised that Minerals and Waste land that is often (latterly) re-used for other purposes is then deemed to be a brownfield site. Some respondents were concerned that there is little distinction between the open countryside and Tier 4 settlements, and some said Tier 3 settlements needs more distinction from Tiers 1 and 2.
- There were some concerns that the vision for the Joint Local Plan and the spatial strategy are not aligned, with the strategy being too rigid or the strategy at risk of failing to achieve the vision.
- It was a suggestion that the strategy doesn't align with the Oxfordshire Strategic Vision and will lead to a shortfall of homes.
- There was concern raised that allocated sites carried over from adopted local plans are inconsistent with the strategy.
- It was suggested that the policy fails to cater for the specialist needs of older people because high-density development does not allow for residential mobile homes and starter homes.
- It was suggested the strategy should acknowledge the benefits of supporting affordable housing led regeneration and provision of all affordable schemes in Tiers 1 to 4.

Historic England objected, requesting acknowledgement in supporting text that the key diagram does not include all key designations (e.g. designated heritage assets). They were keen to ensure historic environment informs the spatial strategy and proposed specific amendments.

Oxford City Council suggested the strategy should reflect Oxford's role and connectivity. They questioned evidence that development is needed in all Tiers, or that Tier 3 is a sustainable location. They stated amendments to the Green Belt should be justified. Also that additional unmet need should be referenced. They offered suggestions for re-wording Part 7.

Oxfordshire County Council supported Option A and specific aspects of the strategy and synergies with the Oxfordshire Strategic Vision and Local Transport and Connectivity Plan. They made clear they did not support Option D. They stated that the spatial strategy should be more closely linked to the vision and objectives. They wanted carbon impacts of the spatial strategy scenarios to be tested against greenhouse gas emissions. They said additional unmet need may not be at odds with the strategy and suggest removal of 'existing' from policy text.

How the main issues have been taken into account

Some comments criticised the strategy set out in Option A based on concerns about not meeting housing need. The strategy provides a framework for the evidence-based housing and employment requirements set out later in the plan, so no change was required.

There was some support for the protection of the Green Belt provided by the policy, and although some respondents asked for designation of new Green Belts or Oxford Green Belt additions, ultimately the review of Green Belt additions that we commissioned did not find a justification for additions at this time.

Whilst we acknowledge that future levels of growth in smaller settlements and rural areas is likely to be relatively slower in comparison to more recent rates of growth across both districts, this doesn't justify the continuation of excess supply of homes above evidenced need and taking into account the new focus on transport sustainability from the Local Transport and Connectivity Plan, no change to this element of the strategy is warranted.

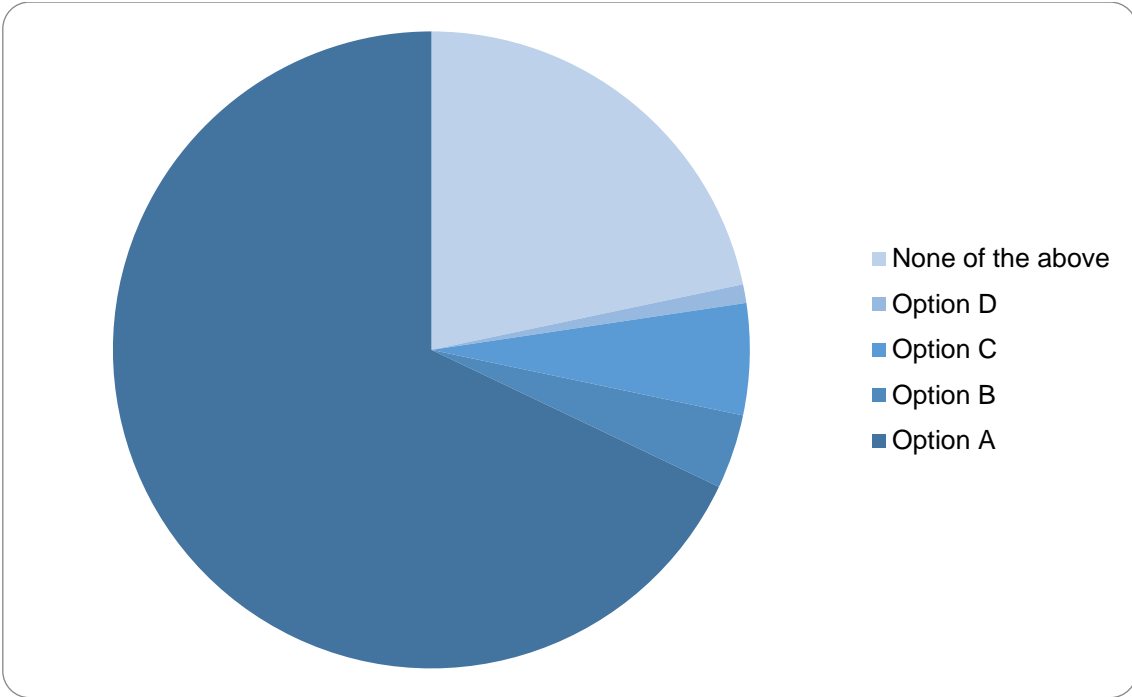
A lot of respondents' criticisms of Option A related to the unmet needs of Oxford. Our Duty to Cooperate statement explains our concerns with Oxford City Council's approach to need and capacity in the city, these matters are live and awaiting outcomes from the Oxford Local Plan examination. The county council's suggestion of removing 'existing' from the policy reference would be contrary to South Oxfordshire and Vale of White Horse's position. Similarly there is no evidence or justification for meeting a level of unmet need for Reading, with their adopted local plan not identifying unmet need for our area.

Policy changes include:

- SP1 has removed reference to a brownfield allocation at Crowmarsh Gifford and been updated to reflect one brownfield allocation instead of two.
- SP1 updated the name of Culham Science Centre to read Culham Campus.

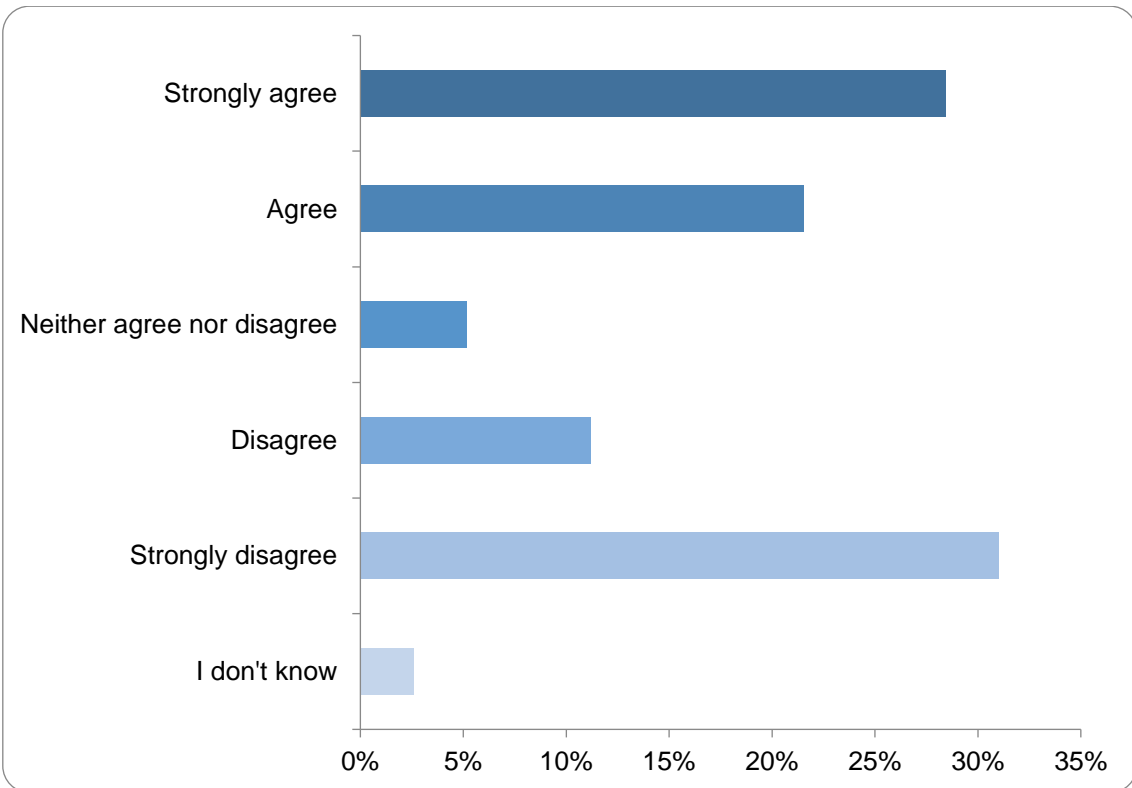
Policy SP2 – Settlement hierarchy

Full Survey: Which option do you prefer?



Of the 106 people who responded to this question, 68% preferred Option A. 484 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 116 people who responded to this question, 50% either agreed or strongly agreed with the proposed draft policy wording. 474 people did not answer.

Full Survey: Summary of main issues raised

- Most comments approved of the consistent methodology across districts that takes account of proximity and connectivity. It was felt that the policy as proposed should protect the countryside and result in sustainable developments. The emphasis on redeveloping brownfield land within the settlements was welcomed.
- Some comments thought there should be more focus on development at settlements with good connectivity to higher order settlements, to improve connectivity overall. In addition, some respondents wanted to ensure employment opportunities were focused at higher tier settlements as further development in smaller settlements (Tier 3 and below) will have an impact on transport infrastructure. There was also some suggestion of merging the scores of specific settlements which are close geographically to each other, so they are moved to a higher tier in the hierarchy.
- There was some discussion about how the built area is defined, with a few calls for the review of existing settlement boundaries to establish further opportunities for sustainable development, and more requests for further clarification of the definition of 'built up area'.
- There were some suggestions that the methodology does not take connectivity/proximity with settlements outside of district i.e. Reading, Swindon and Oxford into account and therefore causes unsustainable development in villages. It was recommended that land on the periphery of these urban areas should be considered, not just existing district settlements.
- A few comments specified that the plan should not forget the countryside as this accounts for most of the districts, and the needs of residents who live in areas within this tier should be recognised. They suggested smaller villages should not be classed as unsustainable as this will become a self-perpetuating cycle. With a comment summarising this as 'over emphasising the disadvantages of travel when compared to the advantages of maintaining vibrant communities'
- There was some concern that settlements have been categorised as countryside when they are settlements, with some comments highlighting the loss of distinction between small/other villages and open countryside more generally.
- Developers discussed the services and facilities or connectivity of specific settlements, in order to confirm the settlement's sustainability and suitability for development, for the purposes of promoting a site.
- There was a concern from developers regarding the overall level of development proposed within each tier, where they think more development should be proposed and the policy is too restrictive. Some of these comments advised that development should not be limited to being within the built-up area of the settlement and should consider additional infill and 'rounding off' at the edge of settlements. There were also requests to allow more greenfield development at the smaller settlements.

- There was a high level of concern about Brightwell-cum-Sotwell's position as a Tier 3 settlement and the possibility of it losing its identity. Comments stated that the assumptions made about it are questionable and contrary to their NDP as they consider themselves a rural village.
- Some comments stated that the settlement assessment does not take account of previously allocated sites and the potential for a settlement to move up the hierarchy due to this planned growth and is therefore flawed.
- Overall, the majority of comments support the removal of smaller settlements from the hierarchy although it was claimed by others that removal of smaller settlements and restriction of development is a significant departure from existing policy.

Oxford City Council suggested it's unclear why backland developments are listed as suitable in Tier 2 settlements but not Tier 3 settlements when there may be potential.

Historic England are concerned by the phrase "There is a presumption in favour of sustainable development within the built-up area of Tier 1 settlements". They noted that the hierarchy includes settlements with significant heritage sensitivities, such as Henley-on-Thames, Wallingford, and Abingdon-on-Thames, and would need to understand the implications of this more clearly if it means something more than alignment with the basics of good planning.

Oxford County Council supported Option A to bring the settlement hierarchies of both districts into one consistent listing, and that the settlements appear to have been categorised as expected. They advise the increase in scoring to settlements which are well connected or in close proximity to higher tiered settlements is reasonable (as would be the case in Option C) but note that some weight is already given to this aspect. They questioned if limiting the types of development listed as appropriate within each tier is in line with the presumption in favour of sustainable development within the NPPF. They also mentioned the disparity in mapping settlement boundaries for some settlements and not others.

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) supported Option A of this policy.

How the main issues have been taken into account

In order to meet the aims of our vision, objectives and spatial strategy, the settlement hierarchy policy sets out what is appropriate for each tier and allows for the broadest range of development types at the most sustainable settlements. This is in conformity with the spatial strategy. In addition, our spatial strategy clarifies that there will be no change to the element of the strategy which sets out levels of growth.

Development bordering Oxford, Reading and Swindon is classed as within the countryside and therefore not appropriate, unless specified/supported within other policies.

The settlement assessment was undertaken at a point in time and considers the services and facilities available at that time. Future iterations and assessments will take into account anything which has been built out in the intervening period.

The connectivity of each settlement is taken into account in the total score that each settlement received in the assessment. Although the relative weighting of having services or facilities within the settlement was higher than the weighting given to being connected and accessible, we believe that this is the right balance of attributes.

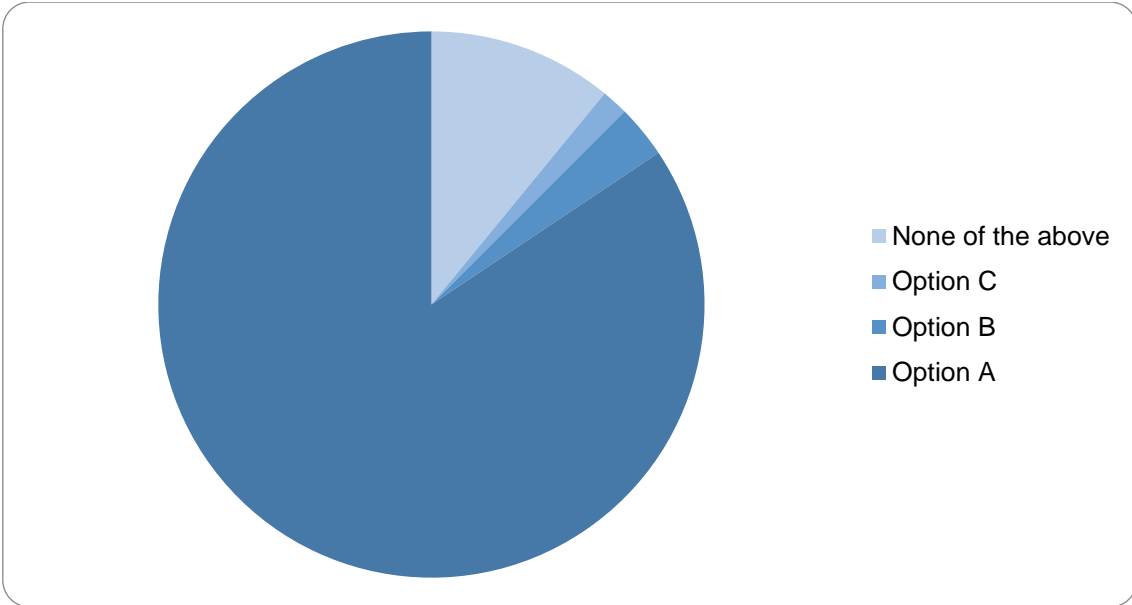
Settlements have been assigned to a tier of the hierarchy alongside settlements which are similar and share common attributes. The methodology was reviewed following the Preferred Options Consultation, and although the concern regarding Brightwell-cum-Sotwell was noted, its position within the hierarchy was not amended as the review did not indicate this would have been appropriate. Some settlements have not been assigned within a tier of the settlement hierarchy and therefore are classed as part of the countryside for the purposes of planning. However this does not detract from the fact that there is a settlement in these locations, it is just that development proposals will be considered differently.

Policy changes include:

- In order to address the queries about what was meant by ‘may be appropriate’ in the draft policy, we amended the policy text to provide clarity that the stated types of development are appropriate in principle. In addition, the glossary definition of the ‘built-up area’ was slightly amended,
- We made clarifications to the supporting text regarding the strategic role of each settlement tier; explaining the specific types of development which are acceptable within each different tier.
- In addition, we added explanation within the supporting text about settlement boundaries; to confirm that the Joint Local Plan does not propose to introduce additional settlement boundaries.
- To address the concerns regarding the smaller settlements, we clarified the supporting text to explain that there is no requirement for NDPs to allocate development, but they are encouraged to include allocations if they have an evidenced local need.

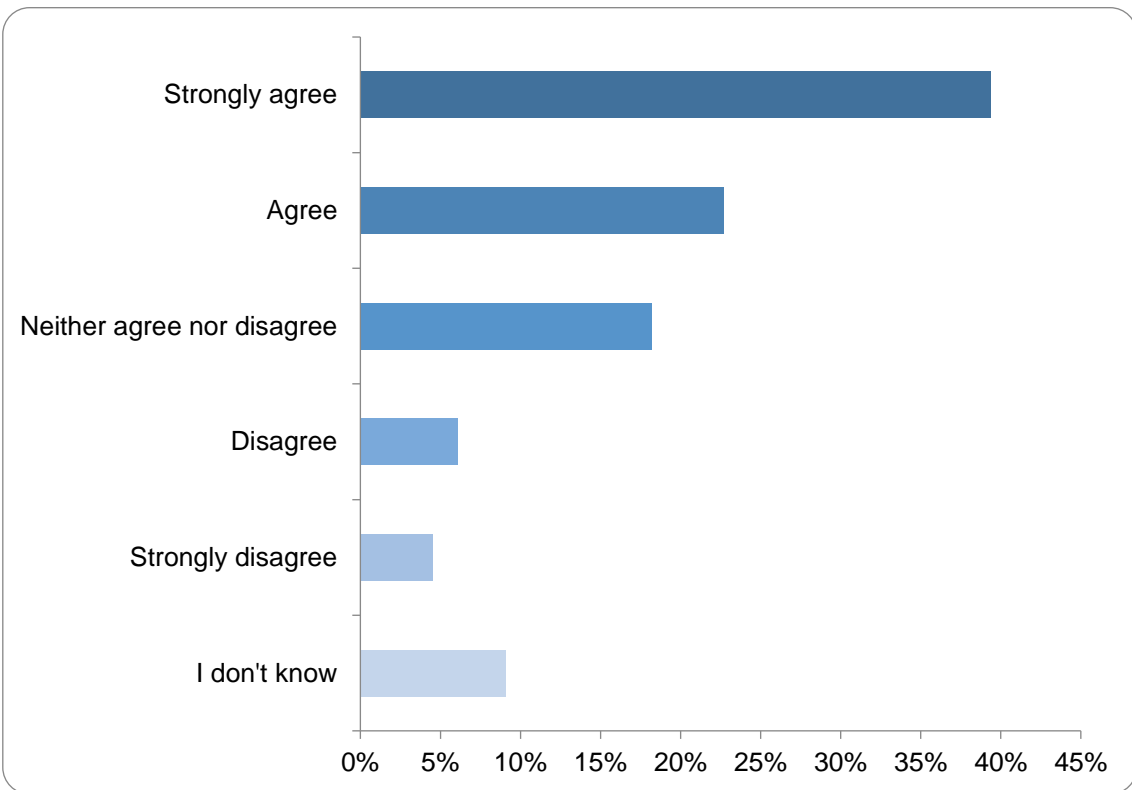
Policy SP3 – The strategy for Didcot Garden Town

Full Survey: Which option do you prefer?



Of the 64 people who responded to this question, 84% preferred Option A. 64 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 66 people who responded to this question, 62% either agreed or strongly agreed with the proposed draft policy wording. 524 people did not answer.

Full Survey: Summary of main issues raised

- Some respondents supported the identification of Didcot as a gateway to, and focus of, sustainable development and regeneration in Science Vale.
- A large proportion of respondents raised concerns about the impact of recent development in Didcot and its impacts on the town, its green spaces and local infrastructure.
- Some respondents suggested that the housing target was too high at Didcot and many wanted the policy to require delivery of necessary infrastructure to support the housing allocations.
- Concern about the 'green gaps' policy around Didcot - one respondent suggested appropriate gaps could be defined within neighbourhood plans, or (if evidence is available) within the JLP - another considered the gaps in their current form constrained development at the edge of Didcot that would offer a sustainable development opportunity for residential development.
- Various respondents proposed specific development sites around Didcot, with some suggesting that more development on greenfield sites on the edge of Didcot was needed or that the amount of housing for Didcot should generally be higher than proposed.
- Didcot Garden Town Delivery Plan – some thought this needed to be updated to take account of what has/has not been delivered so far and that detailed monitoring about success/failures should be published. One respondent suggested that the Masterplan Area should be more ambitious to include land parcels within the 'Area of Influence' and that the development opportunities in and around Didcot were too focused on the short term and were 'inward facing'. Another suggested the policy wasn't deliverable based upon progress so far in Didcot.
- It was suggested that Didcot should have a Neighbourhood Plan, to give planning weight to the delivery plan's principles.
- Key views identified in Neighbourhood Development Plans should also be protected under this policy.
- Biodiversity improvements should include Sutton Courtenay and other villages, where priority habitats and potential wildlife corridors could be linked and enhanced (as highlighted by NDP Policy SC6: Biodiversity).
- Didcot town centre needs revitalising and this should be the focus, not on the new outlying development areas. The town centre should include higher rise development to improve walkability. Lower rates of affordable housing and CIL should be offered to improve viability and help regenerate the town centre.
- As Harwell Campus and Milton Park don't have to pay rates, they can out-compete other locations. This should be done in Didcot to kick start an urban renaissance.
- Several respondents put forward suggestions for specific additions or amendments to the policy wording (including reference to: well-connected, good quality walking and wheeling routes to the town centre and railway station; encouraging community uses, cafes, pubs and restaurants to enhance vibrancy; protection of existing green spaces to prevent loss of

'green gaps'; setting a tree canopy target for Didcot; reference to delivering 'Liveable Neighbourhoods').

Historic England suggested referring to the historic environment in the section that deals with local character and welcomes Part (e), subject to adding reference to the setting of heritage assets.

Network Rail supported the updated Didcot policy.

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) suggested including the new GP facility at Great Western Park development as a key primary healthcare facility.

Oxford City Council rejected Option C and wants more meaningful local policies.

Oxfordshire County Council supported Option A. The Didcot Area Travel Plan and wider Science Vale Area Travel Plan, should be referenced. They suggested consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy. Under Part (e), they suggested that the Milton Heights Active Travel Bridge and the North East Didcot to DTECH LDO Active Travel Bridge are added.

How the main issues have been taken into account

As referenced below, we have made amendments to reflect many of the comments received, however some of suggested changes are already covered by other policies in the plan, so it wasn't necessary to repeat the detail, except where specifically relevant (based on new evidence) to Didcot.

There is no restriction set by this policy to Didcot undertaking the preparation of its own Neighbourhood Plan.

We acknowledge that the scope of Policies SP3 to SP9 (the 'Towns' policies) is intended to complement the development strategy provided in Policy SP1 the supporting text can make this clearer.

We agree that a liveable neighbourhood or 20-minute neighbourhood concept can be encouraged, and this is achieved through the spatial strategy and by explicitly supporting provision of facilities relating to developments.

It was suggested that each Town policy should consider sustainable freight and logistics movement and deliveries, in line with proposals in the Freight and Logistics Strategy. However, this is more relevant at a wider level than at each Tier 1 settlement so would not be applicable.

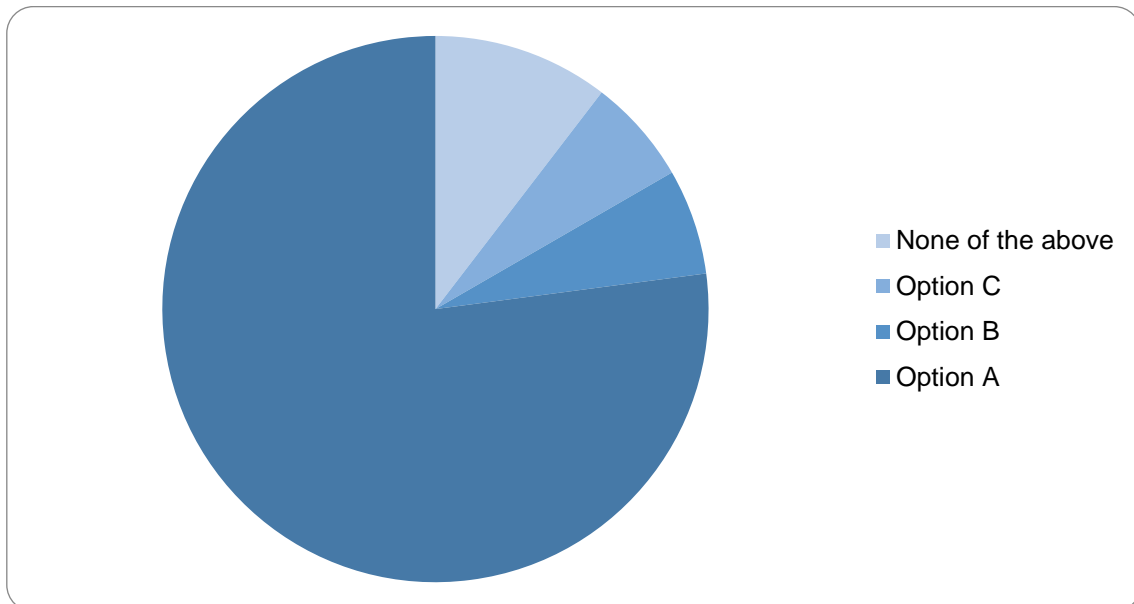
Policy changes include:

- Policy has been reviewed to reflect the policy recommendations of the GI Strategy for South Oxfordshire and Vale of White Horse, specifically on tree canopy coverage.
- Policy has been amended to include travel plans, references to 'wheeling' and relevant infrastructure schemes like GP surgeries and new bridges.

- Policy has been amended at Part (c) to remove conflicting information in the Garden Town principal about how to meet housing need.
- Policy has a separate criterion about conserving and enhancing the town's heritage assets.
- Policy has been clarified at Part (g) to emphasise that this supports nature connectivity and the text about transport connectivity has been separated.
- Policy has been reviewed in light of any changes of circumstances relating to neighbourhood plans within the Didcot Area of Influence.
- Edits made to supporting text to explain the relationship between Policies SP3-9 and the spatial strategy.
- Edits made to supporting text to recommend reference to relevant schemes being identified in the Local Transport and Connectivity Plan and corridor travel plans.

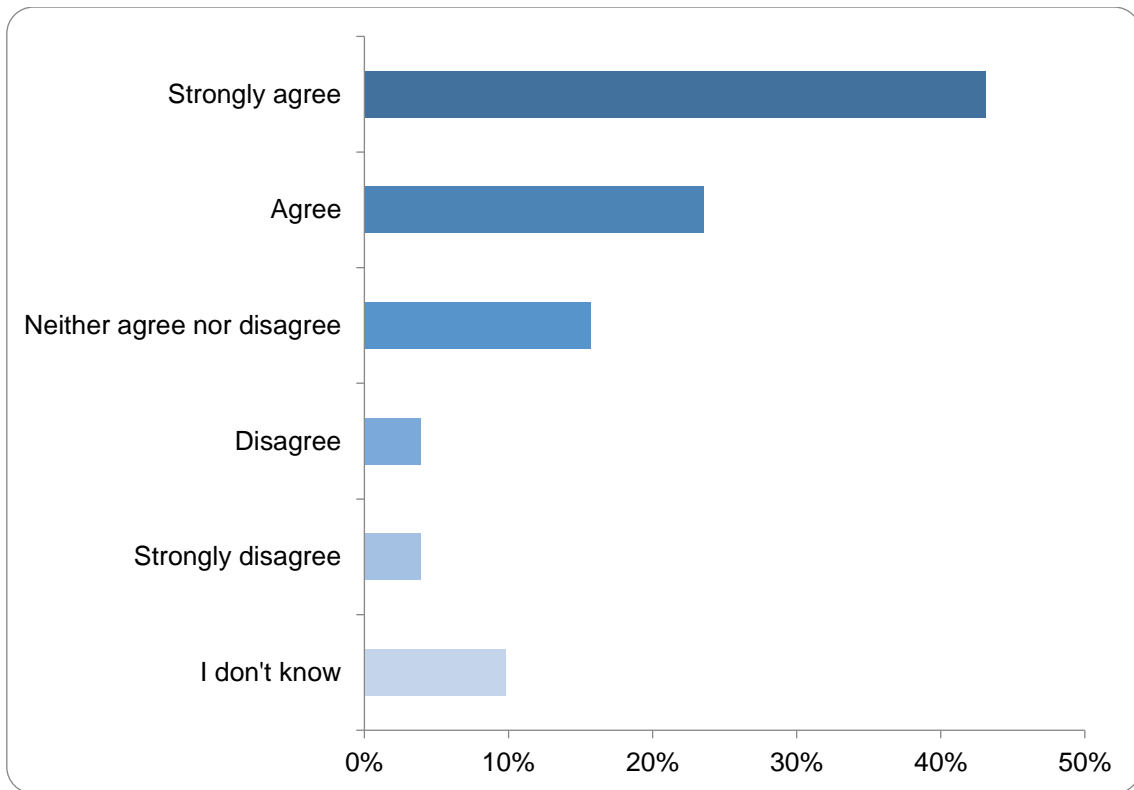
Policy SP4 – A strategy for Abingdon-on-Thames

Full Survey: Which option do you prefer?



Of the 48 people who responded to this question, 77% preferred Option A. 542 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 51 people who responded to this question, 67% either agreed or strongly agreed with the proposed draft policy wording. 539 people did not answer.

Full Survey: Summary of main issues raised

- Given the volume of housing development already underway (and allocated) in the JLP for Abingdon and the town's role as the largest settlement within the area, only retaining an existing (0.7ha) employment allocation at Abingdon Science Park will severely limit new employment development and associated economic growth.
- One respondent suggested the policy should mention enhancing existing pedestrian and cycle routes or providing new routes, where needed, to Culham and Radley stations and to the secondary schools in the town.
- Another felt that the policy should aim to reinvigorate local retail, improve street safety and cleanliness, and encourage us to respect our homes and one another.
- A few respondents thought that the policy was overly optimistic, or too restrictive to provide sufficient flexibility for sustainable development opportunities in and around Abingdon-on-Thames.
- There were suggestions that the policy should consider the needs of equestrians and vulnerable road users and how they can share upgraded routes/Public Rights of Way.
- A tree canopy target needs to be set for Abingdon-on-Thames.
- This policy should make explicit reference to Abingdon-on-Thames' location on the River Thames and should promote better access and improvements to the river's setting for people and nature.

- Reference could also be made to developing Liveable Neighbourhoods (aka 20-minute neighbourhoods) by encouraging or requiring the development of facilities (which would also create some employment) within walkable distance of most homes.
- Two site-specific development proposals at Abingdon-on-Thames were put forward.

Historic England objected to the policy, with concerns about Part (i), which does not align with national policy in relation to non-designated heritage assets. Some revised wording is proposed to address this. They also encourage reference to heritage at risk.

Ministry of Defence highlighted that Abingdon lies within the RAF Benson height safeguarding zone and recommends that the policy indicates development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxford City Council rejected Option C and wants more meaningful local policies.

Oxfordshire County Council suggests adding reference to alignment/delivery of the schemes identified in the LTCP area and corridor travel plans to futureproof their development and approval. Suggests consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy. Also suggests that the Strategic Active Travel Network and Mobility Hubs should be referenced as measures to improve accessibility, including the development of Radley and Culham railway stations as Mobility Hubs, alongside improved access to them. Reference should be added to the development of mobility hubs on the A34 (S) and A420 corridors.

How the main issues have been taken into account

The suggested additions to Part (i) regarding the setting of historic assets is more detail than would be necessary in a strategic policy for Abingdon, especially because there are other policies in the Plan which already include references to setting.

We acknowledge that the scope of Policies SP3 to SP9 (the 'Towns' policies) is intended to complement the development strategy provided in Policy SP1 - the supporting text can make this clearer.

We agree that a liveable neighbourhood or 20-minute neighbourhood concept can be encouraged, and this is achieved through the spatial strategy and by explicitly supporting provision of facilities relating to developments.

It was suggested that each town policy should consider sustainable freight and logistics movement and deliveries, in line with proposals in the Freight and Logistics Strategy. However, this is more relevant at a wider level than at each Tier 1 settlement so would not be applicable.

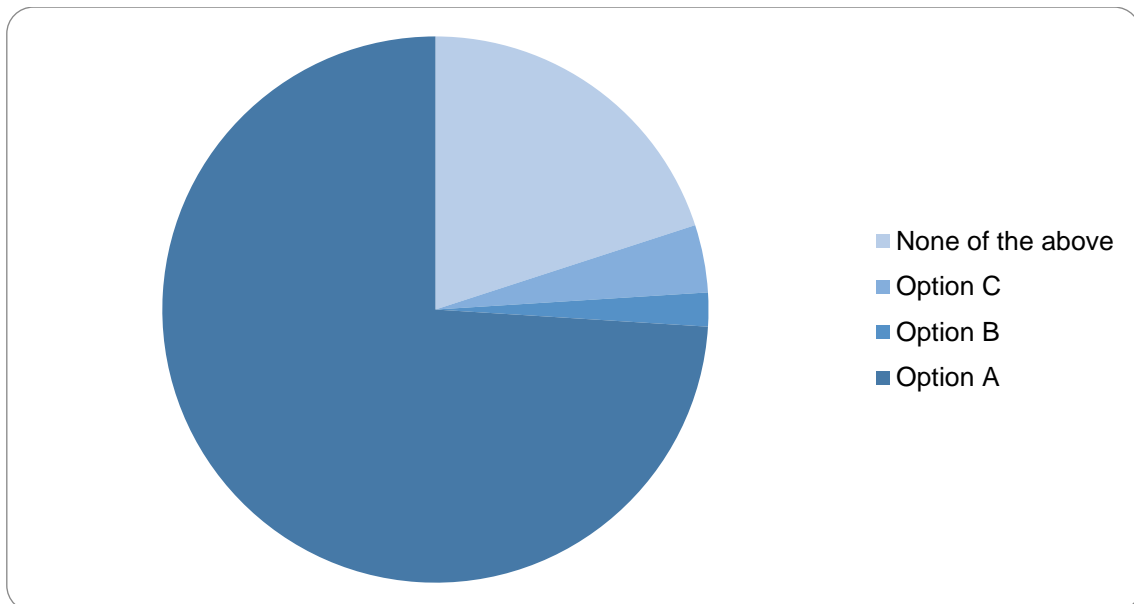
Reference to mobility hubs on the A34 (S) and A420 corridors can eventually be included by reference to mobility hubs that exist in general.

Policy changes include:

- Policy has been reviewed to ensure all recommendations for Abingdon are included, as well as amendments to take on board the recent evidence on other community uses, leisure uses and green spaces.
- Policy has been reviewed to reflect the policy recommendations of the GI Strategy for South Oxfordshire and Vale of White Horse, specifically on tree canopy coverage.
- Policy has been amended to include consideration of LTCP and corridor travel plans; to state that the Strategic Active Travel Network and Mobility Hubs will help improve accessibility; and to include cycle route considerations to the two nearby railway stations.
- Policy has been amended to include reference to the River Thames.
- Policy has been reviewed to ensure recommendations for Abingdon from the Town Centres and Retail Study are included.
- Edits made to supporting text to explain the relationship between Policies SP3-9 and the spatial strategy.
- Edits made to supporting text to recommend reference to relevant schemes being identified in the Local Transport and Connectivity Plan and corridor travel plans.

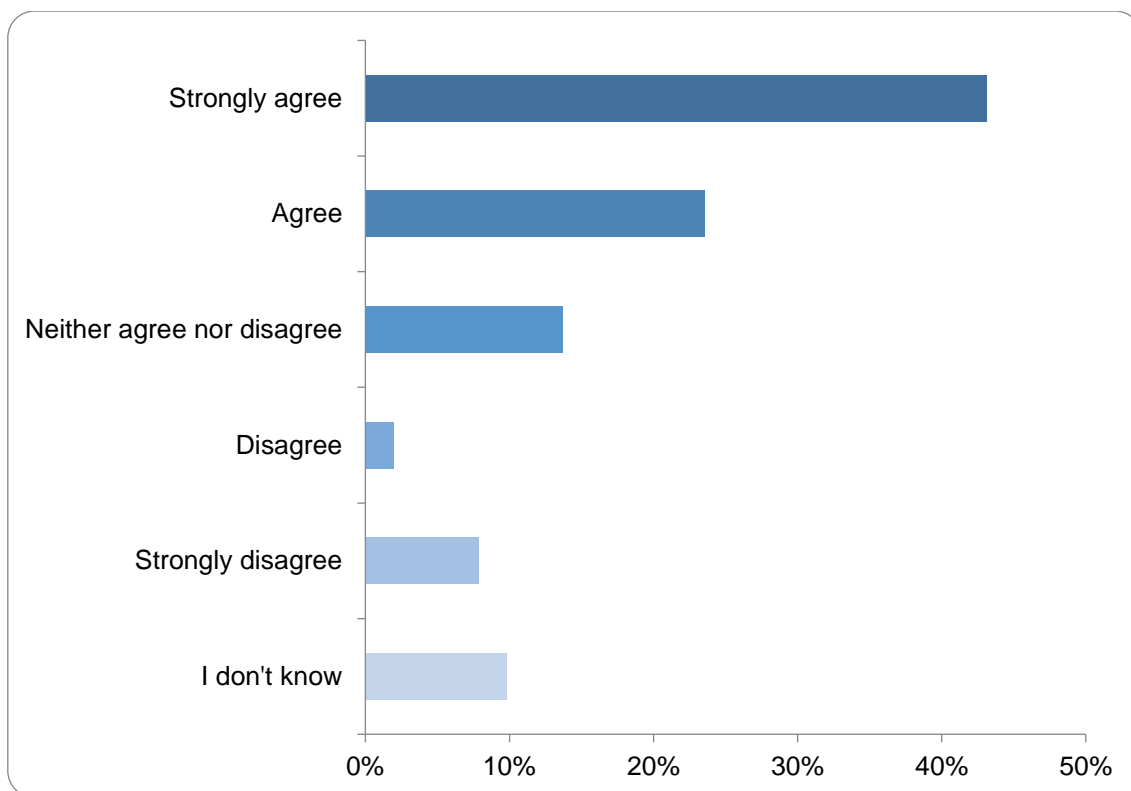
Policy SP5 – A strategy for Faringdon

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 74% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 51 people who responded to this question, 67% either agreed or strongly agreed with the proposed draft policy wording. 539 people did not answer.

Full Survey: Summary of main issues raised

- Several respondents expressed concern that the policy was not in line with the Faringdon Neighbourhood Plan. Particular omissions included having a focal hub; visitors/tourism; pavement café culture; conserving and enhancing heritage; and building local community. (Faringdon Town Council have suggested specific policy edits). A respondent said the policy does not accord with the Neighbourhood Plan policy regarding Wicklesham Quarry.
- One respondent preferred Option A if appropriate weight could be given to a Neighbourhood Plan in planning decisions. However, they felt that where this didn't happen, it would undermine the effort of the local community when putting together such plans and give rise to inertia when updating plans.
- Another respondent wanted the policy to specifically mention enhancing existing pedestrian and cycle routes or providing new routes, where needed, to schools in the town.
- Suggestion that Part (c) was misleading and needed clarifying, and that the policy should support new employment opportunities, and improvement of the building stock within existing employment sites and on brownfield sites within the built-up area.
- It would be helpful to identify new employment opportunities and brownfield sites within the built-up area of Faringdon within a Masterplan, which would also be useful when drawing up a Community Employment Plan.

- There were suggestions that the policy should consider the needs of equestrians and vulnerable road users and how they can share upgraded routes/Public Rights of Way.
- A tree canopy target needs to be set for Faringdon.
- Reference could also be made to developing Liveable Neighbourhoods (aka 20-minute neighbourhoods) by encouraging or requiring the development of facilities (which would also create some employment) within walkable distance of most homes.

Ministry of Defence highlighted that Faringdon lies within the RAF Fairford height and bird strike safeguarding zones and recommends that the policy indicates development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxford City Council rejected Option C and wants more meaningful local policies.

Oxfordshire County Council suggested adding reference to alignment/delivery of the schemes identified in the LTCP area and corridor travel plans to futureproof their development and approval. They also suggested consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy. They also commented that the Strategic Active Travel Network and Mobility Hubs should be referenced as measures to improve accessibility.

How the main issues have been taken into account

Additional wording for alignment with the Faringdon Neighbourhood Plan is not necessary because this policy sets out a high-level strategy and policy framework for Faringdon and it is for the Neighbourhood Plan to include a greater level of detail in its policies. We agree that the local knowledge and input into steering the provision of any new enhancements is needed and supported. We can also confirm that the policy encourages the retention of existing facilities, as well as supporting the provision of new facilities.

We acknowledge that the scope of Policies SP3 to SP9 (the 'Towns' policies) is intended to complement the development strategy provided in Policy SP1 the supporting text can make this clearer.

We agree that a liveable neighbourhood or 20-minute neighbourhood concept can be encouraged, and this is achieved through the spatial strategy and by explicitly supporting provision of facilities relating to developments.

It was suggested that each town policy should consider sustainable freight and logistics movement and deliveries, in line with proposals in the Freight and Logistics Strategy. However, this is more relevant at a wider level than at each Tier 1 settlement so would not be applicable.

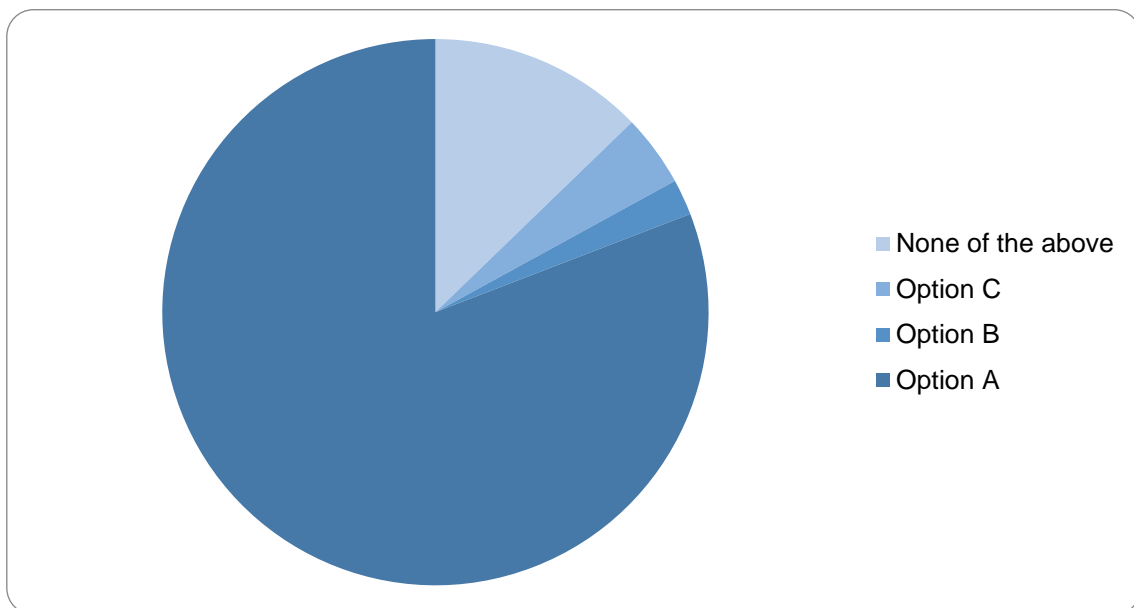
Policy changes include:

- Policy has been reviewed to ensure all recommendations for Faringdon are included, as well as amendments to take on board the recent evidence on other community uses, leisure uses and green spaces.

- Policy has been reviewed to reflect the policy recommendations of the GI Strategy for South Oxfordshire and Vale of White Horse, specifically on tree canopy coverage.
- Policy has been amended to include consideration of LTCP and corridor travel plans; and to state that the Strategic Active Travel Network and Mobility Hubs will help improve accessibility.
- Policy has been reviewed to ensure recommendations for Faringdon from the Town Centres and Retail Study are included.
- Policy amendments made in response to specific suggestions from Faringdon Town Council regarding safe and convenient infrastructure for bus services.
- Edits made to supporting text to explain the relationship between Policies SP3-9 and the spatial strategy.
- Edits made to supporting text to recommend reference to relevant schemes being identified in the Local Transport and Connectivity Plan and corridor travel plans.

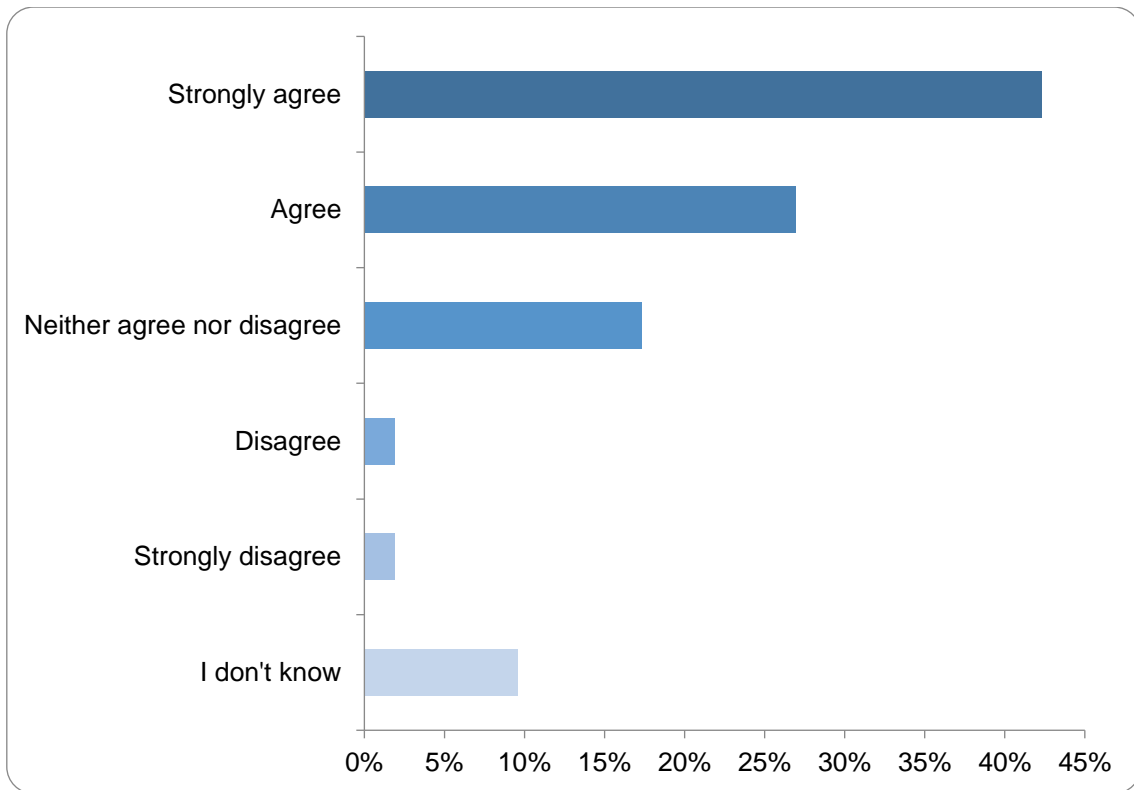
Policy SP6 – A strategy for Henley-on-Thames

Full Survey: Which option do you prefer?



Of the 47 people who responded to this question, 81% preferred Option A. 543 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 52 people who responded to this question, 69% either agreed or strongly agreed with the proposed draft policy wording. 538 people did not answer.

Full Survey: Summary of main issues raised

- One respondent was supportive of the strategy for Henley-on-Thames and agreed that there was no outstanding housing requirement for the town.
- Another respondent said that there should be positive encouragement for cafes, pubs and restaurants to enhance the vibrancy of the town.
- There was one request for the policy to specifically mention enhancement of existing pedestrian and cycle routes and provision of links between them, schools and employment sites, or where they are identified in a Local Cycling and Walking Infrastructure Plan.
- Consideration and understanding should be given to the specific challenges for Henley-on-Thames, in terms of geography/topography (river to the east, hilly/undulating hinterland to the west) and demographics.
- There were suggestions that the policy should consider the needs of equestrians and vulnerable road users and how they can share upgraded routes/Public Rights of Way.
- A tree canopy target needs to be set for Henley-on-Thames.
- Adding the word “sustainable” before “visitor economy” would help emphasise the value of sustainable tourism and the pressures posed by car-led tourism.
- This policy should make explicit reference to Henley’s location on the River Thames and should promote better access and improvements to the river’s setting for people and nature.

- Reference could also be made to developing Liveable Neighbourhoods (aka 20-minute neighbourhoods) by encouraging or requiring the development of facilities (which would also create some employment) within walkable distance of most homes.

Historic England queried if further detail could be added to the headline aim of conserving and enhancing the town's heritage assets. They also encouraged reference to heritage at risk.

Ministry of Defence highlighted that Henley-on-Thames lies within the RAF Benson height safeguarding zone and the Central WAM Network technical safeguarding zone and recommends that policy indicates development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxford City Council rejected Option C and wanted more meaningful local policies.

Oxfordshire County Council suggested adding reference to alignment/delivery of the schemes identified in the LTCP area and corridor travel plans to futureproof their development and approval. They suggested consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy. The county council also suggested that the Strategic Active Travel Network and Mobility Hubs should be referenced as measures to improve accessibility.

How the main issues have been taken into account

Reference to sustainable tourism and more detail on heritage assets (such as the three conservation areas and the River Thames) are useful additions to the policy.

We acknowledge that the scope of Policies SP3 to SP9 (the 'Towns' policies) is intended to complement the development strategy provided in Policy SP1 the supporting text can make this clearer.

We agree that a liveable neighbourhood or 20-minute neighbourhood concept can be encouraged, and this is achieved through the spatial strategy and by explicitly supporting provision of facilities relating to developments.

It was suggested that each Town policy should consider sustainable freight and logistics movement and deliveries, in line with proposals in the Freight and Logistics Strategy. However, this is more relevant at a wider level than at each Tier 1 settlement so would not be applicable.

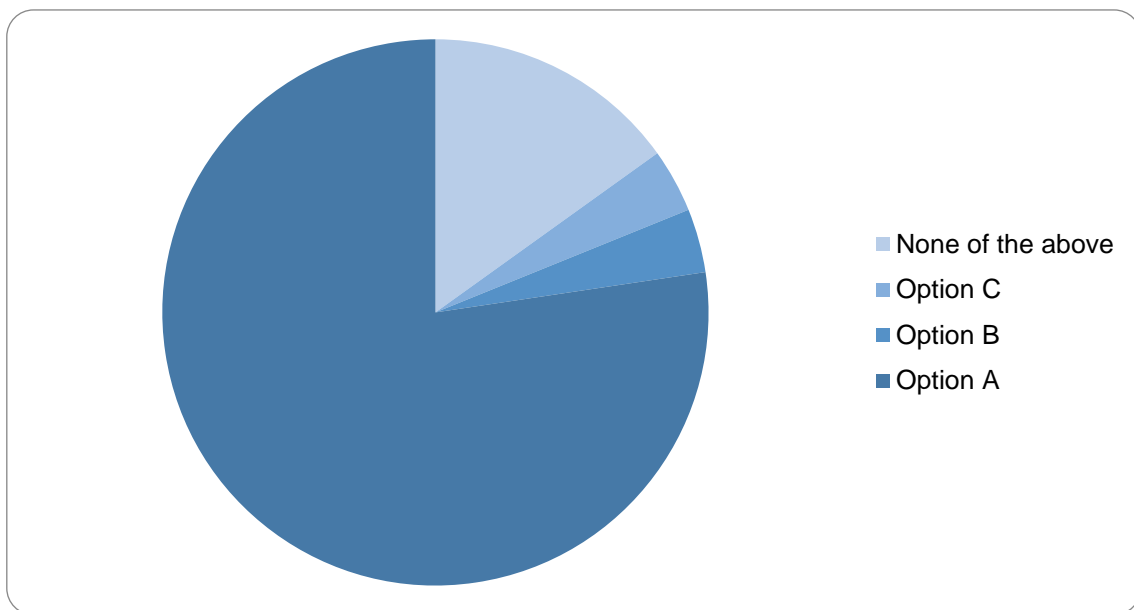
Policy changes include:

- Policy includes 'sustainable' to the reference to the visitor economy.
- Policy has been reviewed to ensure all recommendations for Henley are included, as well as amendments to take on board the recent evidence on other community uses, leisure uses and green spaces.
- Policy has been amended to reflect the policy recommendations of the GI Strategy for South Oxfordshire and Vale of White Horse.

- Policy has been amended to include consideration of LTCP and corridor travel plans; and to state that the Strategic Active Travel Network and Mobility Hubs will help improve accessibility.
- Policy has been amended to include specific historic features of Henley-on-Thames.
- Policy was missing ecological considerations which features as a new criterion.
- Policy has been reviewed to ensure recommendations for Henley-on-Thames from the Town Centres and Retail Study are included.
- Edits made to supporting text to explain the relationship between Policies SP3-9 and the spatial strategy.
- Edits made to supporting text to recommend reference to relevant schemes being identified in the Local Transport and Connectivity Plan and corridor travel plans.

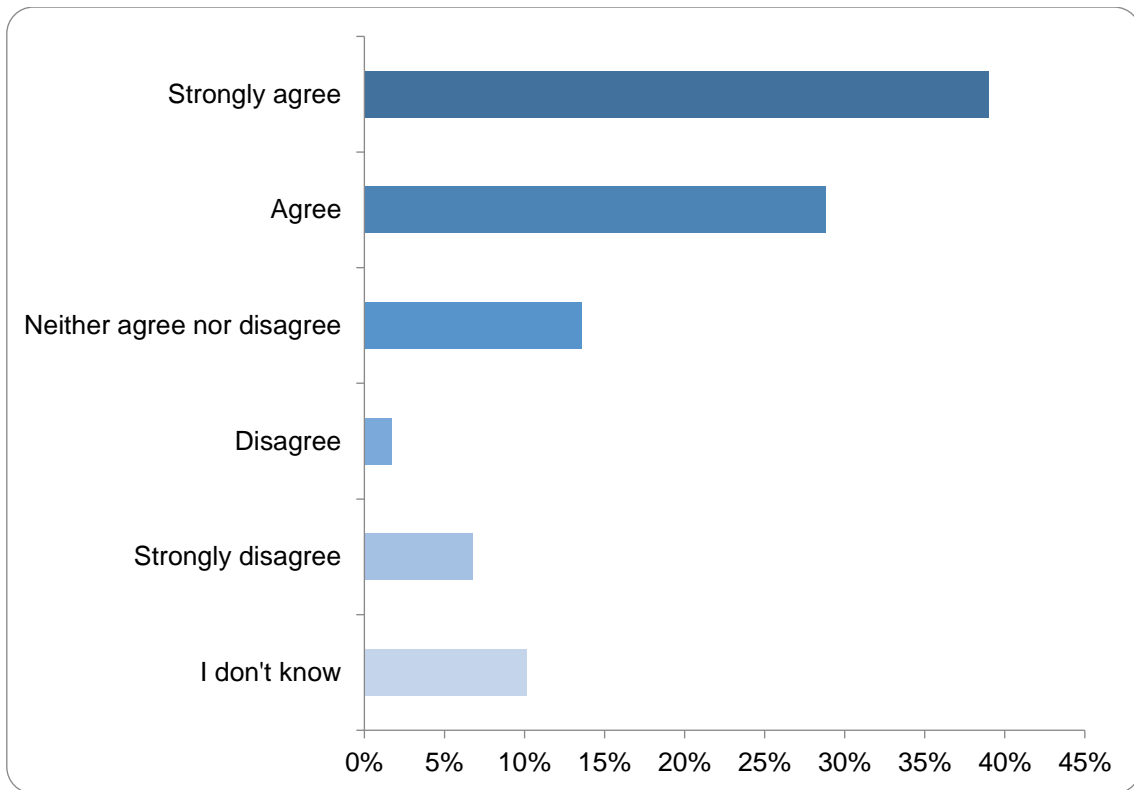
Policy SP7 – A strategy for Thame

Full Survey: Which option do you prefer?



Of the 53 people who responded to this question, 77% preferred Option A. 537 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 59 people who responded to this question, 68% either agreed or strongly agreed with the proposed draft policy wording. 531 people did not answer.

Full Survey: Summary of main issues raised

- Some respondents were concerned that the local plan couldn't be delivered without allocations or neighbourhood plan targets to support Thame as an attractive, vibrant and sustainable location. With a limited housing requirement (143 dwellings), they felt there was little scope for Thame to benefit from the delivery of the wider plan objectives, nor boost affordable housing delivery.
- One respondent was critical about directing all growth to the built-up area, as they felt this was not the most sustainable pattern due to the shortage of such sites. They suggested that the growth strategy should include 'edge of urban area' sites too.
- Another respondent highlighted that the employment land needs evidence supporting the Thame neighbourhood plan had yet to be examined and found 'sound' and that the requirement for more land could still arise. They expressed concern that, whilst Thame had capacity to meet its employment needs, neither the JLP or emerging TNP2 provided for enough land to cover the employment floorspace already lost to non-employment development (estimated to be 4.82ha).
- There were suggestions that the policy should consider the needs of equestrians and vulnerable road users and how they can share upgraded routes/Public Rights of Way.
- A tree canopy target needs to be set for Thame.

- One respondent suggested that the 143 homes allocated to Thame should be a minimum, whilst another objected to the reduction in the quantum of housing delivery and queried how the revised figure had been calculated.
- This policy should make explicit reference to promoting better access and improvements to the setting of the River Thame and Cuttle Brook for people and nature.
- Reference could also be made to Liveable Neighbourhoods (aka 20-minute neighbourhoods) by encouraging or requiring the development of facilities (which would also create some employment) within walkable distance of most homes.
- The policy should support increases to conventional free parking for local rural communities not served by public transport or cycle paths.

Historic England queried if further detail could be added to the headline aim of conserving and enhancing the town's heritage assets.

Ministry of Defence highlighted that Thame lies within the RAF Benson height safeguarding zone and recommends that the policy indicates development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxford City Council rejected Option C and wanted more meaningful local policies.

Oxfordshire County Council suggested adding reference to alignment/delivery of the schemes identified in the LTCP area and corridor travel plans to futureproof their development and approval. They also suggested consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy. The county council also suggested that the Strategic Active Travel Network and Mobility Hubs should be referenced as measures to improve accessibility.

How the main issues have been taken into account

Based on need and identified supply already provided for in the districts, there are no new housing or employment land targets that need to be set for Thame (above the small outstanding figure in draft policy SP7). However, the NDP group can choose to prepare a growth supportive neighbourhood plan, with sites within the built-up area of Thame supported by the Joint Local Plan's spatial strategy.

We acknowledge that the scope of Policies SP3 to SP9 (the 'Towns' policies) is intended to complement the development strategy provided in Policy SP1 the supporting text can make this clearer.

We agree that a liveable neighbourhood or 20-minute neighbourhood concept can be encouraged, and this is achieved through the spatial strategy and by explicitly supporting provision of facilities relating to developments.

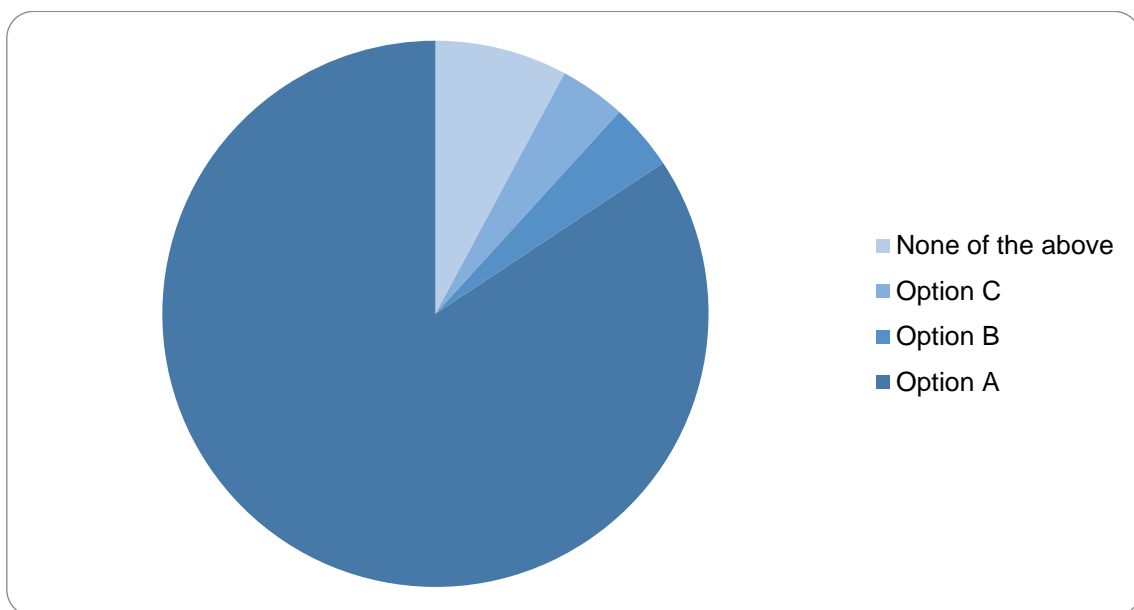
It was suggested that each Town policy should consider sustainable freight and logistics movement and deliveries, in line with proposals in the Freight and Logistics Strategy. However, this is more relevant at a wider level than at each Tier 1 settlement so would not be applicable.

Policy changes include:

- Policy has been reviewed to ensure all recommendations for Thame are included, as well as amendments to take on board the recent evidence on other community uses, leisure uses and green spaces.
- Policy has been amended to reflect the policy recommendations of the GI Strategy for South Oxfordshire and Vale of White Horse.
- Policy has been amended to include consideration of LTCP and corridor travel plans; to state that the Strategic Active Travel Network and Mobility Hubs will help improve accessibility; and to include a new reference to accessibility to Haddenham and Thame Parkway station.
- Policy has been reviewed to ensure recommendations for Thame from the Town Centres and Retail Study are included.
- Policy has been amended to include specific historic features of Thame.
- Edits made to supporting text to explain the relationship between Policies SP3-9 and the spatial strategy.
- Edits made to supporting text to recommend reference to relevant schemes being identified in the Local Transport and Connectivity Plan and corridor travel plans.

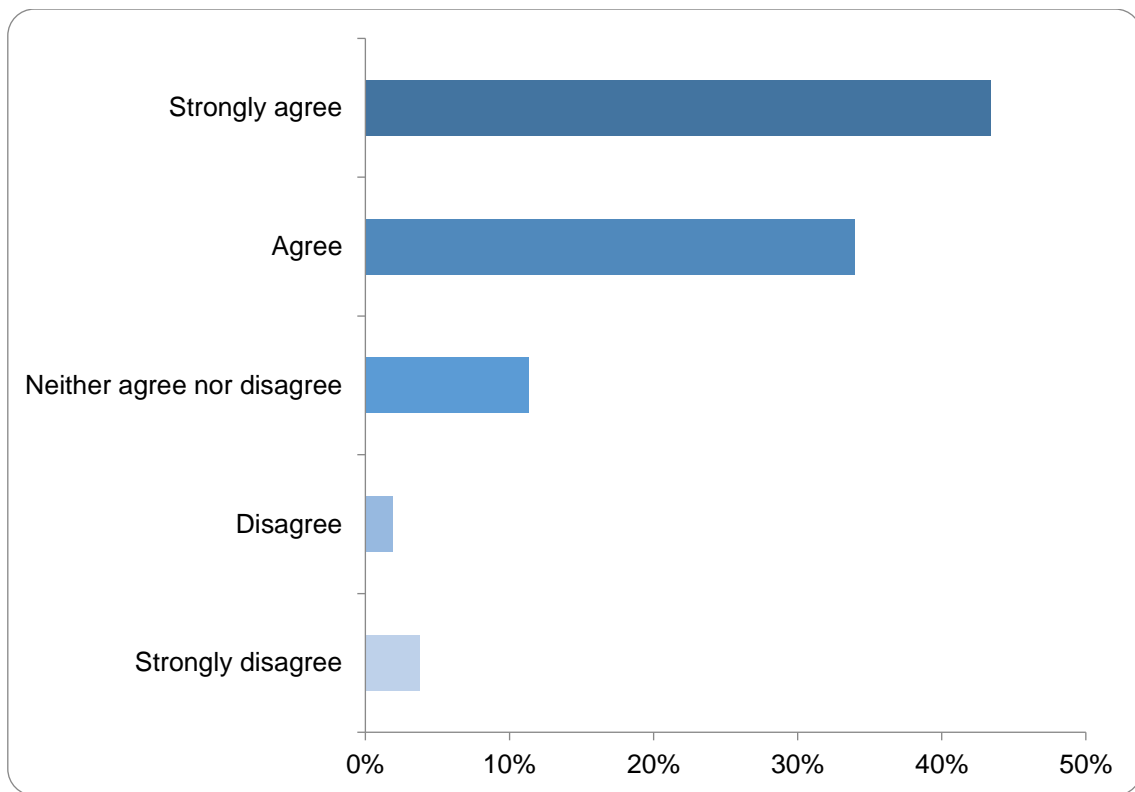
Policy SP8 – A strategy for Wallingford

Full Survey: Which option do you prefer?



Of the 51 people who responded to this question, 84% preferred Option A. 539 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 53 people who responded to this question, 77% either agreed or strongly agreed with the proposed draft policy wording. 537 people did not answer.

Full Survey: Summary of main issues raised

- Some respondents suggested there was not enough information about the locality, missing references to community uses, encouragement for cafes, pubs and restaurants and strengthening the visitor and evening economy.
- Others suggested the policy should identify a minimum housing requirement for the town or have regard to strategic allocations made.
- One respondent asked for neighbourhood plan reviews to focus on climate emergency responses, incentivising active travel and public transport by reallocating space to these.
- There were suggestions that the policy should consider the needs of equestrians and vulnerable road users and how they can share upgraded routes/Public Rights of Way.
- A tree canopy target needs to be set for Wallingford.
- There was a request for the policy to specifically mention enhancement of existing pedestrian and cycle routes and provision of links between them, particularly to Cholsey station, schools and employment sites or where they are identified in a Local Cycling and Walking Infrastructure Plan.
- Reference could also be made to Liveable Neighbourhoods (aka 20-minute neighbourhoods) by encouraging or requiring the development of facilities (which would also create some employment) within walkable distance of most homes.

- One respondent felt that we should not encourage electric vehicles into the town just to recharge, and that EVs should be located where flood proofed.
- Other suggestions included policy requirements for the provision of facilities for informal wheeled activities and ball games and specific provision for girls, in line with the “Make Space for Girls!” campaign (e.g. swings, hang out zones, places to sit down and wander around together).

Ministry of Defence highlighted that Wallingford lies within the RAF Benson height safeguarding zone and the Central WAM Network technical safeguarding zone and recommends that the policy indicates development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Historic England queried if further detail could be added to the headline aim of conserving and enhancing the town’s heritage assets. They welcomed the inclusion of Part (c) and encourage reference to heritage at risk.

Oxford City Council rejected Option C and wanted more meaningful local policies.

Oxfordshire County Council suggested adding reference to alignment/delivery of the schemes identified in the LTCP area and corridor travel plans to futureproof for these strategies development and approval. They also suggested consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy. The county council suggested that the Strategic Active Travel Network and Mobility Hubs should be referenced as measures to improve accessibility.

How the main issues have been taken into account

There was a specific ask for a NDP housing target for Wallingford, however, we do not consider this is necessary, given the status of supply and neighbourhood planning within the town. However, the NDP group can choose to prepare a growth supportive neighbourhood plan, with sites within the built-up area of Wallingford supported by the JLPs spatial strategy.

We acknowledge that the scope of Policies SP3 to SP9 (the ‘Towns’ policies) is intended to complement the development strategy provided in Policy SP1 the supporting text can make this clearer.

The policy explicitly supports community uses and services in Part (b) and Part (j). Also, cafes, pubs and restaurants are already supported under Part (a).

We agree that a liveable neighbourhood or 20-minute neighbourhood concept can be encouraged, and this is achieved through the spatial strategy and by explicitly supporting provision of facilities relating to developments.

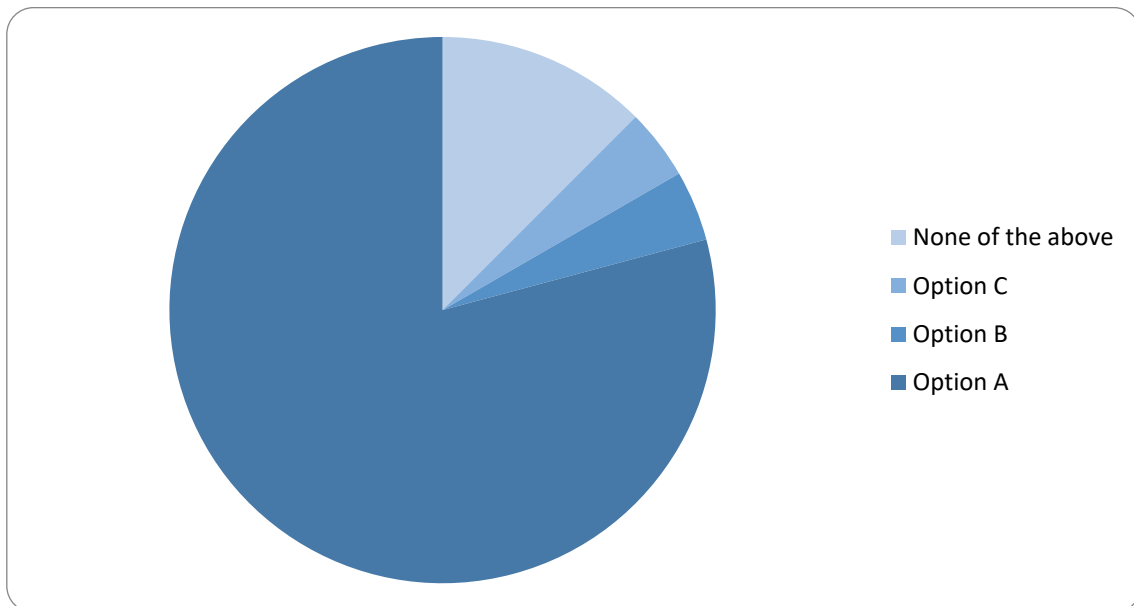
It was suggested that each Town policy should consider sustainable freight and logistics movement and deliveries, in line with proposals in the Freight and Logistics Strategy. However, this is more relevant at a wider level than at each Tier 1 settlement so would not be applicable.

Policy changes include:

- Policy has been reviewed to ensure all recommendations for Wallingford are included, as well as amendments to take on board the recent evidence on other community uses, leisure uses and green spaces.
- Policy has been reviewed to reflect the policy recommendations of the GI Strategy for South Oxfordshire and Vale of White Horse, specifically on tree canopy coverage.
- Policy has been amended to include consideration of LTCP and corridor travel plans; to state that the Strategic Active Travel Network and Mobility Hubs will help improve accessibility; and to include reference to accessibility to Cholsey railway station.
- Policy has been reviewed to ensure recommendations for Wallingford from the Town Centres and Retail Study are included.
- Policy edits are made to Part (iii) to reference the relationship between Wallingford and Cholsey.
- Policy has been amended to include specific historic features of Wallingford.
- Edits made to supporting text to explain the relationship between Policies SP3-9 and the spatial strategy.
- Edits made to supporting text to recommend reference to relevant schemes being identified in the Local Transport and Connectivity Plan and corridor travel plans.

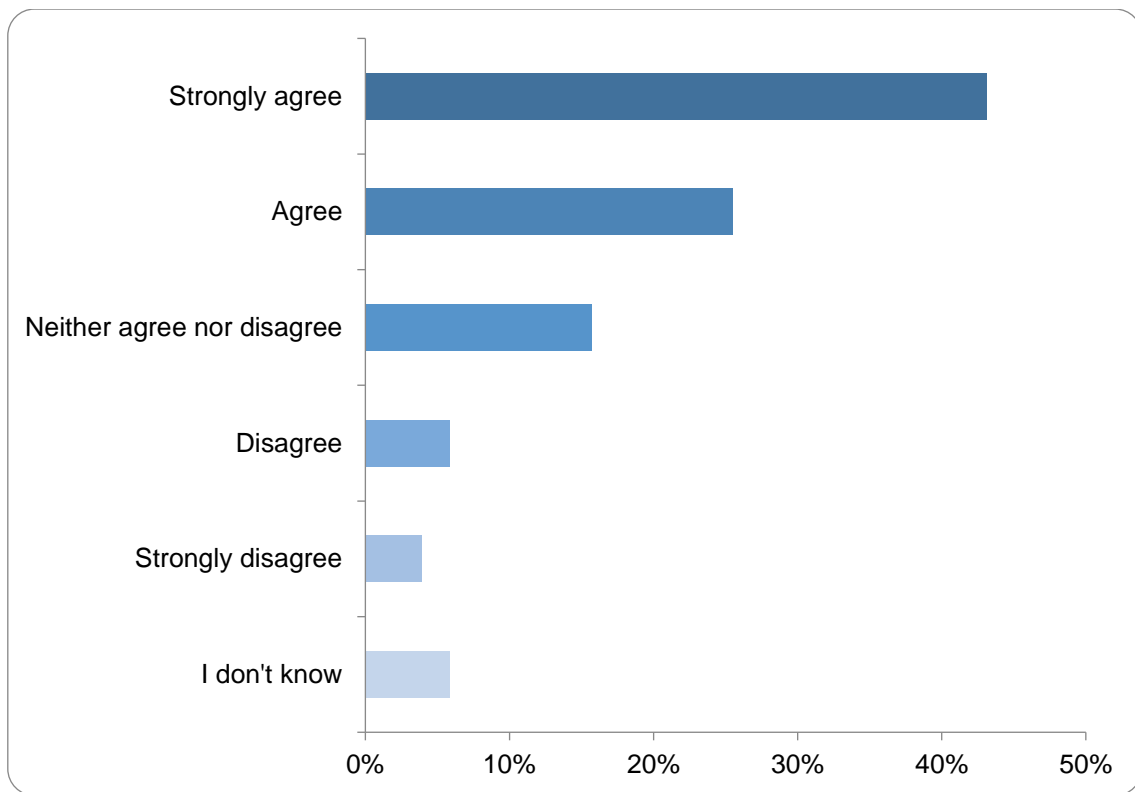
Policy SP9 – A strategy for Wantage

Full Survey: Which option do you prefer?



Of the 48 people who responded to this question, 79% preferred Option A. 542 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 51 people who responded to this question, 68% either agreed or strongly agreed with the proposed draft policy wording. 539 people did not answer.

Full Survey: Summary of main issues raised

- Some respondents suggested that there was not enough information about what is missing in the locality, for example sport facilities and green infrastructure.
- Several respondents advocated for the inclusion of a new station at Grove.
- The policy requirements related mostly to streetscape enhancements, rather than principles to guide development - it was suggested that the policy should instead set out aspirations for the scale of new development, what it will deliver and how it will connect to and enhance the town.
- This policy should apply across a wider area, incorporating Wantage and Grove and possibly East Challow (i.e. the area covered by the forthcoming LCWIP). As Wantage and Grove share infrastructure and a desire for a future rail station, if provided, new infrastructure would serve both communities.
- There were suggestions that the policy should consider the needs of equestrians and vulnerable road users and how they can share upgraded routes/Public Rights of Way.
- A tree canopy target needs to be set for Wantage.
- Reference could be made to developing Liveable Neighbourhoods (aka 20-minute neighbourhoods) by encouraging or requiring the development of facilities (which would also create some employment) within walkable distance of most homes.

Historic England queried if further detail could be added to the headline aim of conserving and enhancing the town's heritage assets.

Oxford City Council rejected Option C and wanted more meaningful local policies.

Oxfordshire County Council suggested adding reference to alignment/delivery of the schemes identified in the LTCP area and corridor travel plans to futureproof for these strategies development and approval. They also suggested consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy. The county council suggested that the Strategic Active Travel Network and Mobility Hubs should be referenced as measures to improve accessibility.

How the main issues have been taken into account

Respondents highlighted the relationships between settlements like Grove and Wantage, however Policy SP9 is a spatial policy which focuses on the Tier 1 towns that have their policy context set out in policies SP1 and SP2. Whilst we recognise the number of ways in which there are linkages between Wantage and Grove, it would not be applicable to consider Wantage and Grove in the same strategic policy, as we only intend to highlight the importance of Tier 1 settlements strategies in helping support the plans strategy, vision and objectives for development.

We acknowledge that the scope of Policies SP3 to SP9 (the 'Towns' policies) is intended to complement the development strategy provided in Policy SP1 the supporting text can make this clearer.

As there remains a lack of certainty about deliverability of Grove railway station this cannot yet be included as a deliverable scheme within Policy SP9.

We agree that a liveable neighbourhood or 20-minute neighbourhood concept can be encouraged, and this is achieved through the spatial strategy and by explicitly supporting provision of facilities relating to developments.

It was suggested that each Town policy should consider sustainable freight and logistics movement and deliveries, in line with proposals in the Freight and Logistics Strategy. However, this is more relevant at a wider level than at each Tier 1 settlement so would not be applicable.

Policy changes include:

- Policy has been reviewed to ensure all recommendations for Wantage are included, as well as amendments to take on board the recent evidence on other community uses, leisure uses and green spaces.
- Policy has been reviewed to reflect the policy recommendations of the GI Strategy for South Oxfordshire and Vale of White Horse.
- Policy has been amended to include consideration of LTCP and corridor travel plans; and to state that the Strategic Active Travel Network and Mobility Hubs will help improve accessibility.
- Policy has been reviewed to ensure recommendations for Wantage from the Town Centres and Retail Study are included.

- Policy has been amended to include specific historic assets of Wantage and Charlton.
- Edits made to supporting text to explain the relationship between Policies SP3-SP9 and the spatial strategy.
- Edits made to supporting text to recommend reference to relevant schemes being identified in the Local Transport and Connectivity Plan and corridor travel plans.

Other general comments regarding Chapter 5: Spatial strategy and settlements

Full Survey: Summary of main issues raised

- One respondent suggested amending the Science Vale boundary to include Blewbury

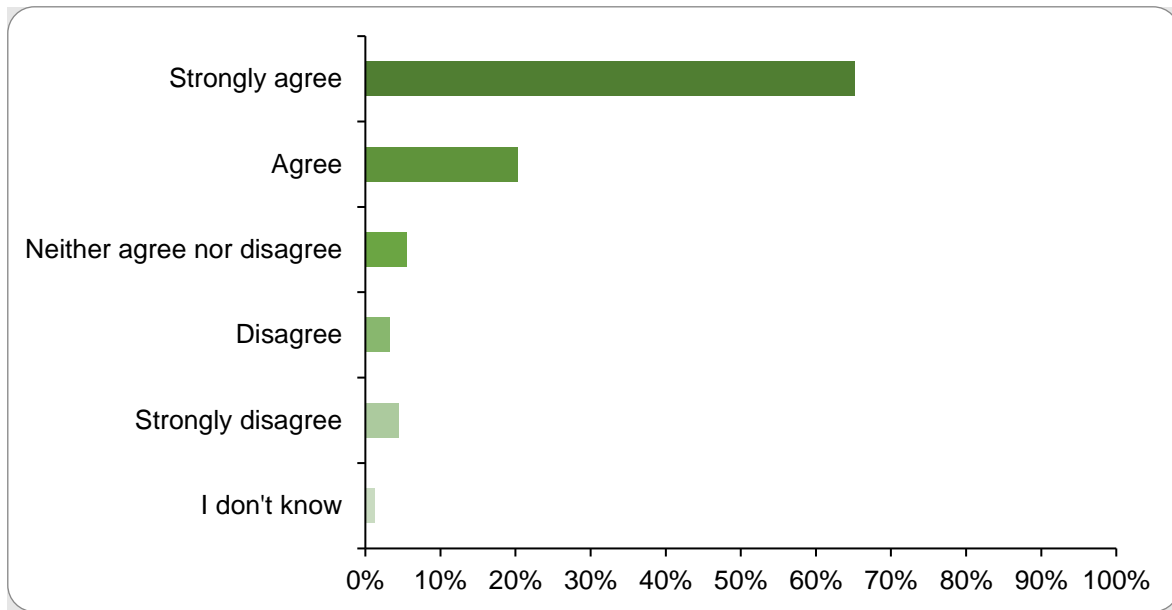
Historic England emphasised the importance of heritage considerations influencing the town-based strategies. They raised specific examples of heritage assets at risk in some of the town centres and highlighted the importance of considering these. They emphasised the value of character assessment to underpin the town-based strategies and felt it wasn't entirely clear that there is enough of the information needed in existing evidence to provide an informed view on the character and townscape of the major settlements.

How the main issues have been taken into account

The town-based strategies have been updated to reference relevant heritage assets that are of strategic importance to each town. Amending the Science Vale boundary is beyond the scope of the Joint Local Plan and no justification has been provided for such a review.

Housing

Nutshell (Section 1): How far do you agree or disagree with the principle of reducing the housing target in the new Joint Local Plan?



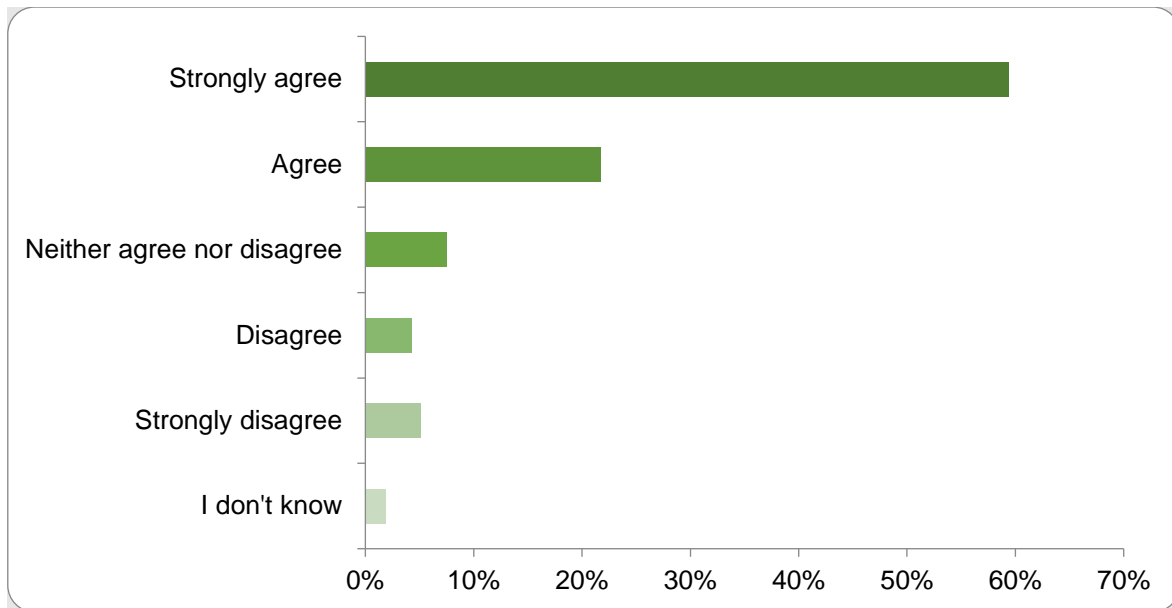
Of the 634 people who responded to this question, 85% of people either agreed or strongly agreed with the principle of reducing the housing target in the new Joint Local Plan. 48 people did not answer.

Nutshell (Section 1): Other comments on how many new homes

334 people answered this question.

Respondents raised a number of comments relating to the provision of new homes. The most common issue raised was that respondents felt infrastructure is already at capacity for the existing population; any new housebuilding would need to align with timely and sufficient provision of additional infrastructure. Indeed, as highlighted above, there was a preference for a reduced number of new homes and consideration to the location of new homes (for instance, prioritising Brownfield sites instead of building on the Green Belt and not delivering homes to meet Oxford's unmet need). Where homes are needed and delivered, affordability was a key factor, with concerns raised about the level of affordability and comments on housing mix indicating that more affordable homes are needed. Respondents also highlighted the challenges associated with other constraints in the district, such as flood risk, service and utilities constraints, biodiversity implications, impacts on the rural countryside and other environmental impacts associated with development. Some comments were made with respect to design of development alongside specific site allocations.

Nutshell (Section 2): Our preferred option does not include significant new sites for large scale housebuilding beyond the sites already identified for development in the last local plans. How far do you agree or disagree with this approach?



Of the 625 people who responded to this question, 81% of people either agreed or strongly agreed with not including new sites for large scale development in the Joint Local Plan. 57 people did not answer.

Nutshell (Section 2): Other comments on large sites for housebuilding

221 people answered this question.

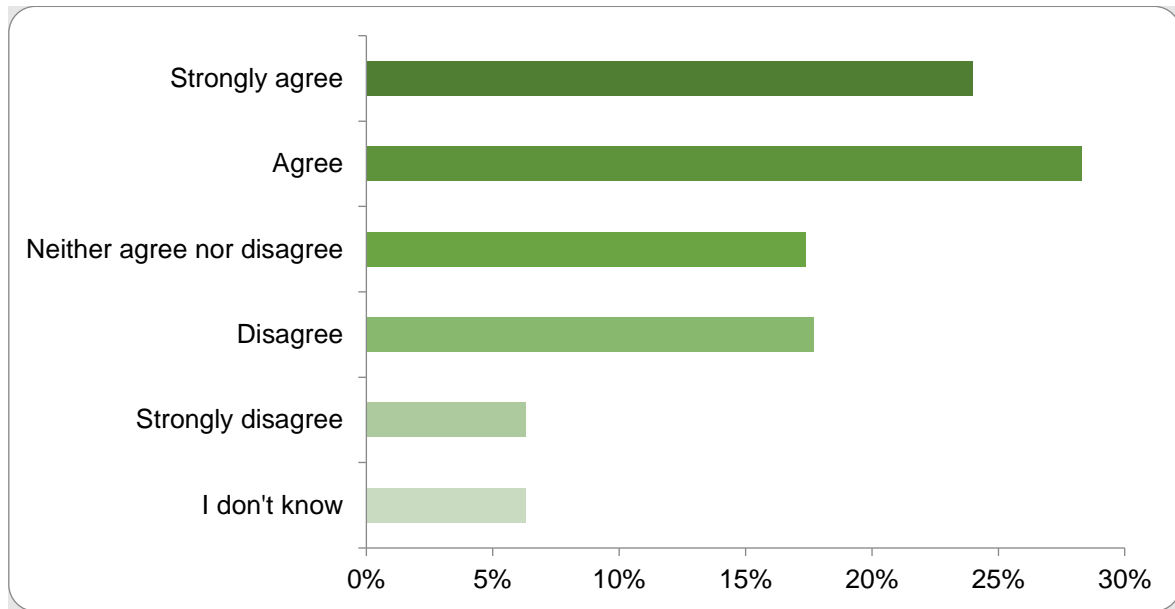
The most common comments raised in response to this question were regarding the provision of infrastructure. Respondents felt that infrastructure provision is inadequate and is negatively impacted by new housing development, which results in a negative impact for new and existing communities. Where infrastructure is provided as part of larger housing developments, it should be required prior to, or alongside, the house building. With respect to the level and location of development, respondents suggested that no further large-scale housing developments are required, with a focus on smaller, more dispersed sites. Where the large-scale developments are delivered, there should be additional protections to the Green Belt, with further exploration and prioritisation of Brownfield and/or infill sites. Equally, developments should be located in close proximity to employment with development appropriately phased to align with delivery of infrastructure and services and a minimised impact on the traffic network; some respondents supported the provision of new housing close to existing towns and settlements, whilst others felt development should be located away from areas that have already experienced significant growth.

Similarly to responses to Section 1 of the Nutshell, respondents highlighted the constraints with housing delivery and the impacts on the environment. There was an identified need for additional (genuinely) affordable housing as the current provision is insufficient. Generally, there is a conflict between views raised with respect to the quantum and location of development, with acknowledgement that well located, designed, serviced and appropriately phased, sufficient infrastructure delivery associated with development is preferred where homes need to be delivered.

A number of respondents objected to the larger housing sites allocated in the local plan, which will be covered in more detail later in this report.

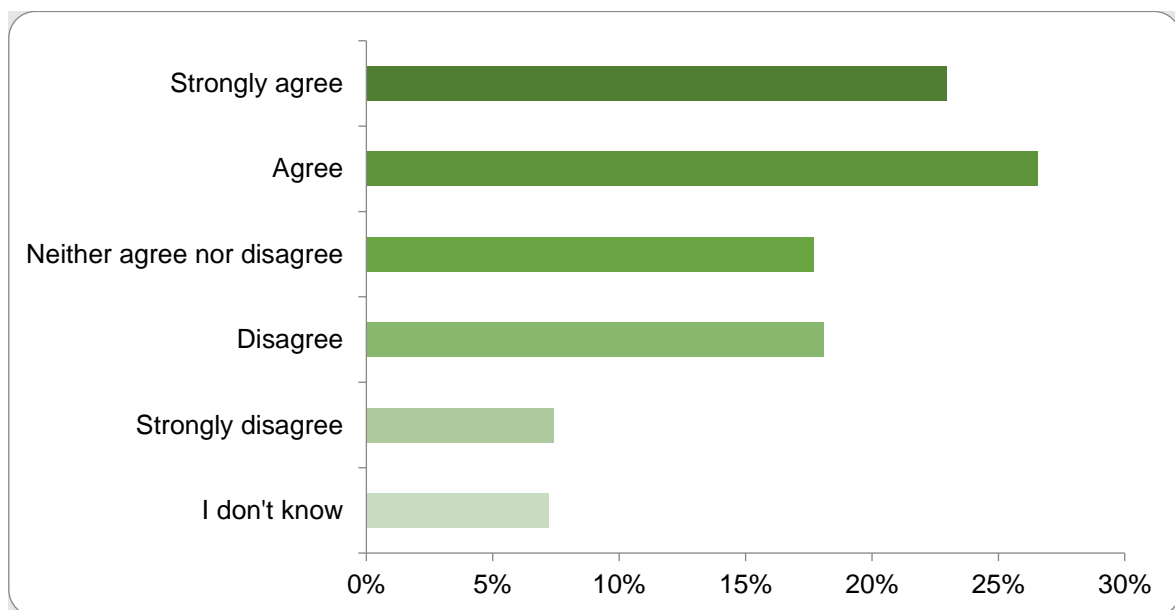
Nutshell (Section 4): How far do you agree or disagree with the Affordable Housing percentages?

South Oxfordshire



Of the 604 people who responded to this question, 52% of people either agreed or strongly agreed with the proposed 50% affordable housing requirement for South Oxfordshire. 78 people did not answer.

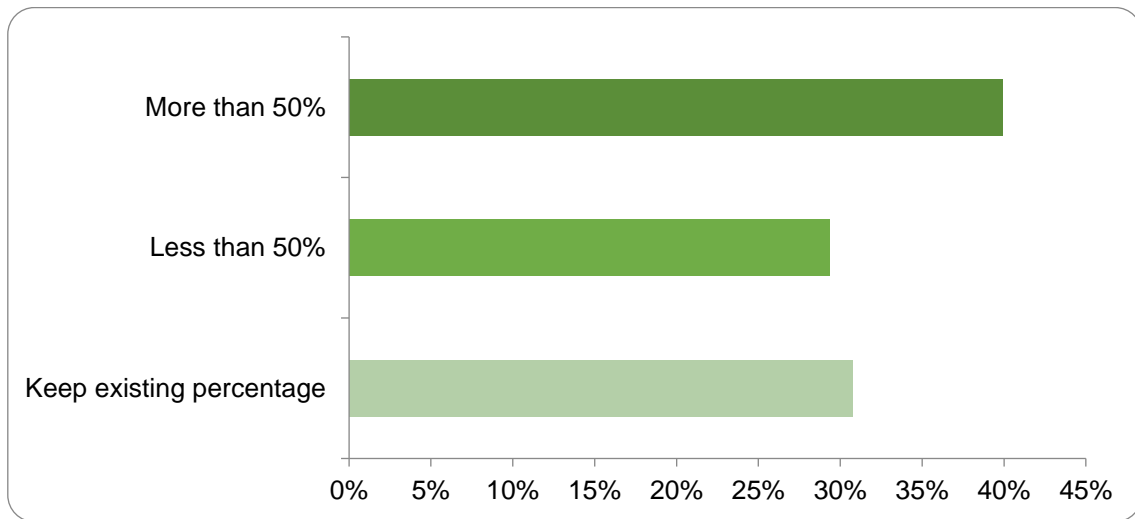
Vale of White Horse



Of the 553 people who responded to this question, 50% of people either agreed or strongly agreed with the proposed 50% affordable housing requirement for Vale of White Horse. 129 people did not answer.

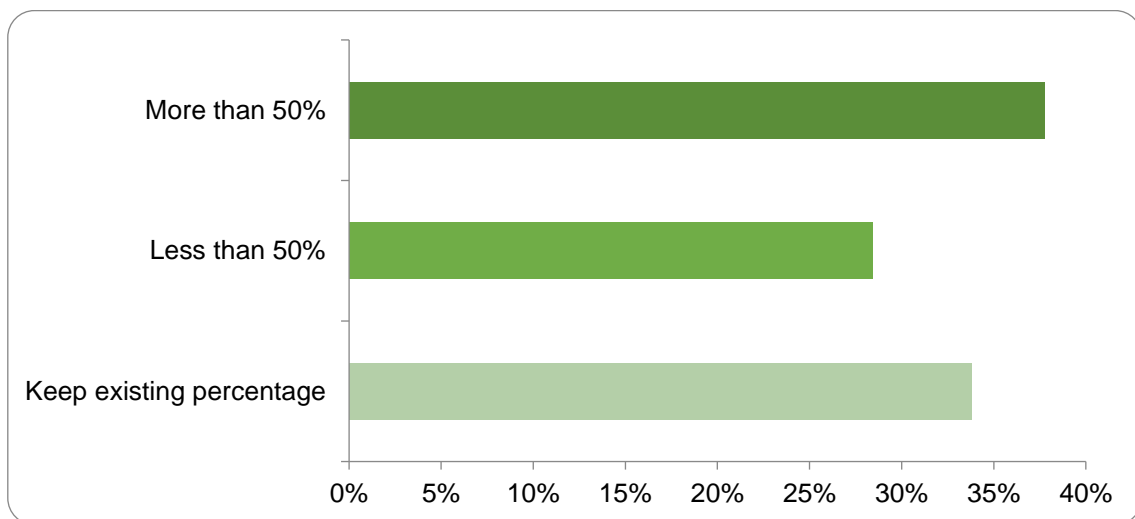
Nutshell (Section 4): If you selected disagree or strongly disagree, what percentage of Affordable Housing would you propose?

South Oxfordshire



Of the 208 people who responded to this question, 40% answered more than 50% affordable housing, 31% answered to keep the existing percentage and 29% of people answered less than 50% affordable housing. 474 people did not answer.

Vale of White Horse



Of the 204 people who responded to this question, 38% answered more than 50% affordable housing, 34% answered to keep the existing percentage and 28% of people answered less than 50% affordable housing. 478 people did not answer.

Nutshell (Section 4): Other comments on affordable homes

210 people answered this question.

The most common comments provided in response to this question were that affordable housing is still unaffordable. Generally, almost all respondents support the provision of some level of affordable housing, with only a few respondents not

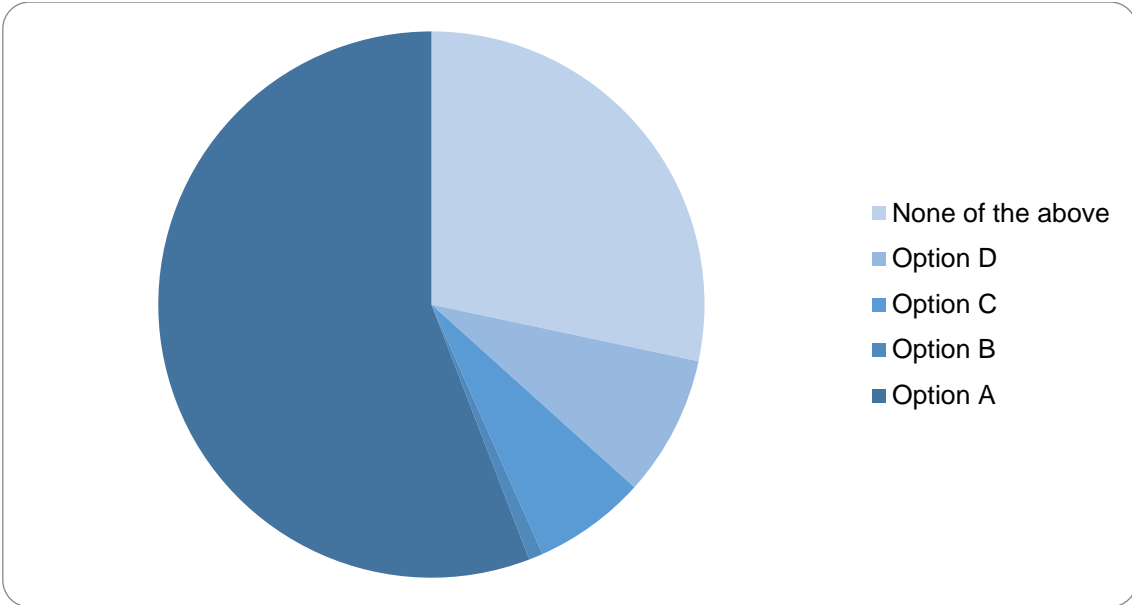
supporting the provision of affordable housing. Respondents believe that affordable housing should be of a good quality and available for those who need it (e.g., young people, key workers, first time buyers, low-income families). This is largely because house prices are considered too high in the local area. Moreover, there was a desire for affordable homes to be built where they are most needed, such as in both towns and villages (preference for delivery on brownfield sites) near jobs to reduce the need for commuting. Some respondents queried the definition of affordable housing, and what affordable housing actually is.

In terms of the quantum of affordable housing proposed by the draft Preferred Options policy, respondents made comments both in support and objection. Some respondents felt that providing 50 per cent affordable housing was appropriate (and in some cases, it should be more or even full sites), whilst others thought a lower percentage would be more appropriate. In some cases, respondents felt that the level of affordable housing provided should be based on evidenced need and/or vary depending on site location. Questions were raised on the viability and/or land value of developments if delivering a higher percentage of affordable housing, and whether this may lead to costs being cut elsewhere, particularly when high quality design remains a priority and/or developers are seeking to protect profit. Some respondents felt that delivery of affordable housing should be a requirement of developers, with strict enforcement to build the level of affordable housing required, whilst others felt that affordable housing delivery and management should be the responsibility of local authorities.

A number of comments were made in relation to tenure and mix; a need was raised for a range of sizes, although there was disparity between the perceived requirements for specific sized homes – with a preference for more affordable smaller homes and fewer affordable larger four or five bed homes. It was felt that more social rent housing is required, and the mix should be informed by local need to deliver truly affordable housing, built where it is most needed for local people.

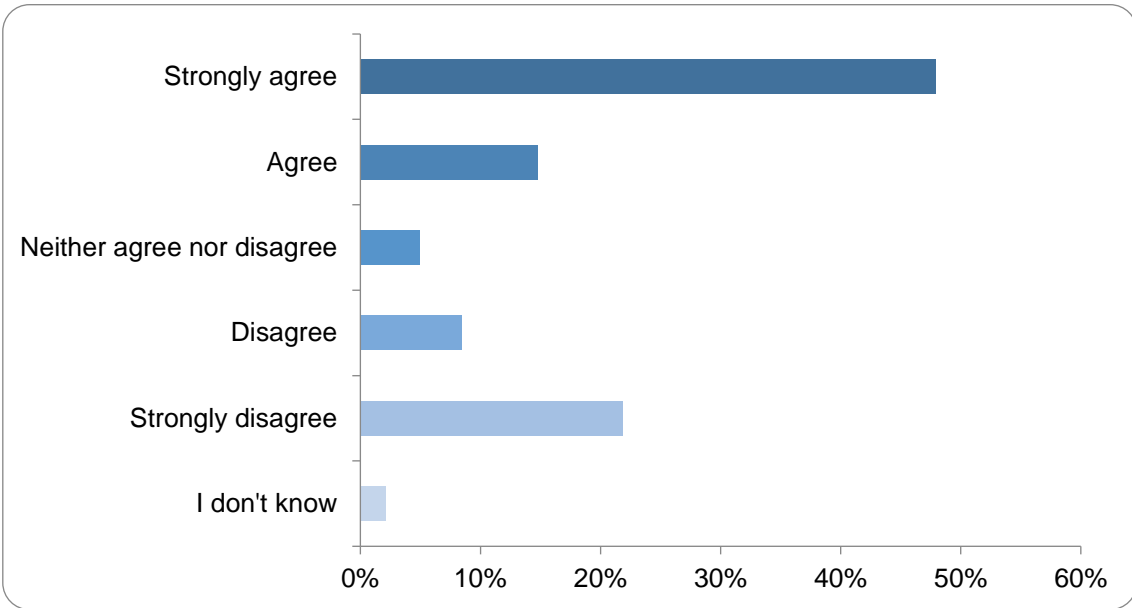
Policy HOU1 – Housing requirement

Full Survey: Which option do you prefer?



Of the 120 people who responded to this question, 56% preferred Option A. 470 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 142 people who responded to this question, 63% either agreed or strongly agreed with the proposed draft policy wording. 448 people did not answer.

Full Survey: Summary of main issues raised

- Some respondents supported the councils' proposed approach to follow the Standard Method, citing the unjustified and damaging high levels of housing from the previous plans, supported by the Oxfordshire Growth Deal. Others said that the plan should consider a lower housing need than the standard method.

- Many developers and landowners suggested that the Standard Method and Joint Housing Needs Assessment (JHNA) do not take account of the economic growth plans of Oxfordshire (including the Oxfordshire Growth Deal), and that these represent exceptional circumstances to depart from the Standard Method. Some comments made specific reference to the growth targets identified in the housing and economic needs assessment commissioned by Oxford City Council (not supported by South Oxfordshire and Vale of White Horse District Councils). These comments suggested that following the Standard Method would lead to worsening affordability and more in-commuting to meet the asserted job growth.
- Some developers commented that the Standard Method does not provide enough housing to address the affordable housing needs of the districts, and the uplift to 50% affordable housing is unlikely to be justified.
- Some developers raised concerns that the councils hadn't assessed alternatives to the Standard Method properly through the sustainability appraisal.
- Some suggested that the councils should consider addressing more unmet need from Oxford City Council, up to 2040. Others argued that the agreed unmet need from Oxford to be accommodated should be reduced due to the capacity issues of Oxford Sewage Treatment works. Other comments stated that the councils should accommodate unmet need from other neighbouring authorities (such as Reading).
- Some raised concerns regarding the 2021 base date. They stated this would backwardly apply a Local Housing Need figure to a period that the population projections and affordability ratio do not relate and provide an 'artificial' boost to supply as completion and committed development would contribute to delivery within the new plan period.
- Some stated that the plan should have a single, shared housing requirement for both districts, rather than a split, and stepped requirement for each council.

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) supported Option A of this policy. The draft plan should ensure the primary healthcare provision and capacity can be adequate to accommodate the population growth from new housing development.

Oxfordshire County Council requested that the plan specifically identifies which allocations will be providing the housing required to meet Oxford's unmet need. They also contended that local plans in the districts should be designed to recognise that existing sites allocated close to the boundaries of Oxford might accommodate additional Oxford unmet need into the future. Additional land should only be taken out of the Green Belt on the edges of Oxford if there are defined exceptional circumstances.

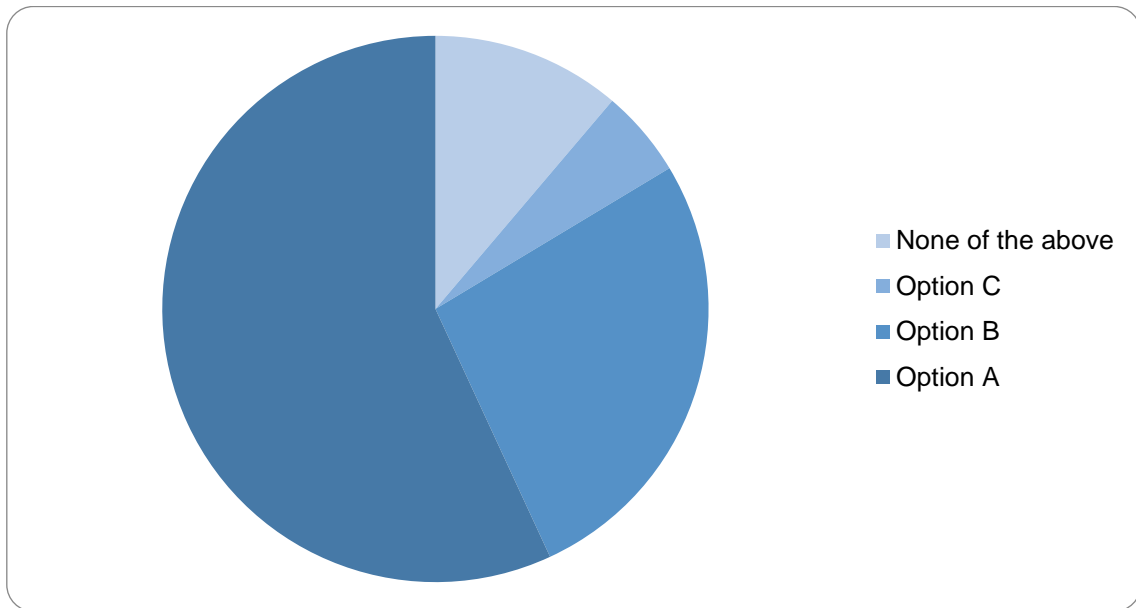
How the main issues have been taken into account

We have assessed the responses to the consultation and consider that the proposed housing requirement for the plan is sound. Currently, the councils still consider the existing, agreed unmet need from Oxford's Local Plan 2036 justifies an uplift in our

housing needs and this is reflected in the proposed submission policy. We are not convinced by alternative arguments that exceptional circumstances justify a higher or lower housing need. We have updated the proposed housing requirements for each council to take account of the updated Standard Method figures based on the 2023 affordability ratios.

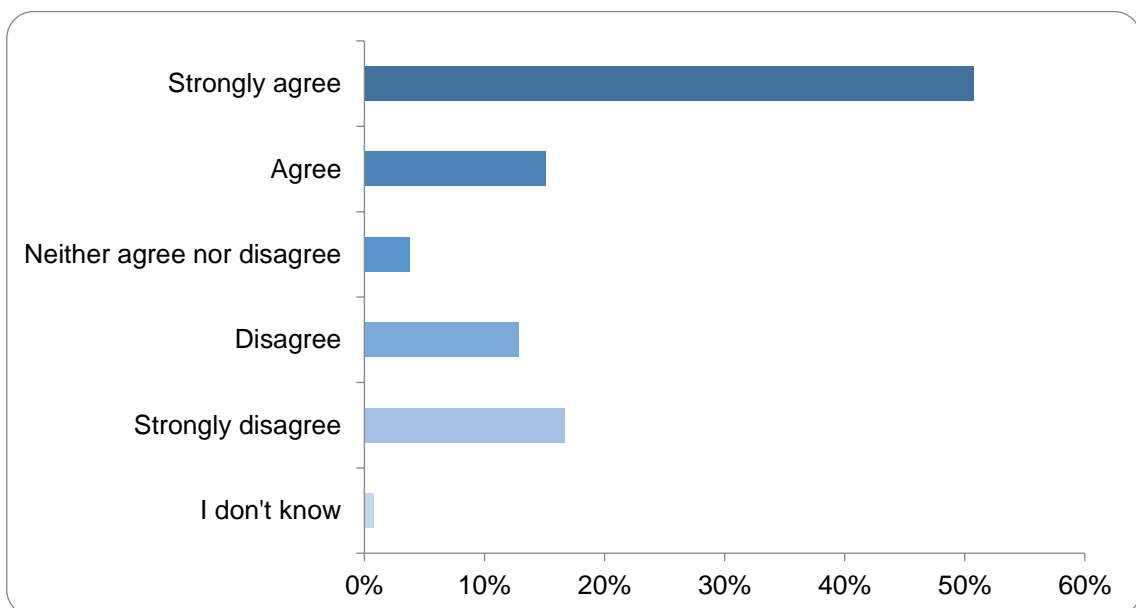
Policy HOU2 – Sources of housing supply

Full Survey: Which option do you prefer?



Of the 116 people who responded to this question, 57% preferred Option A. 474 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 132 people who responded to this question, 66% either agreed or strongly agreed with the proposed draft policy wording. 458 people did not answer.

Full Survey: Summary of main issues raised

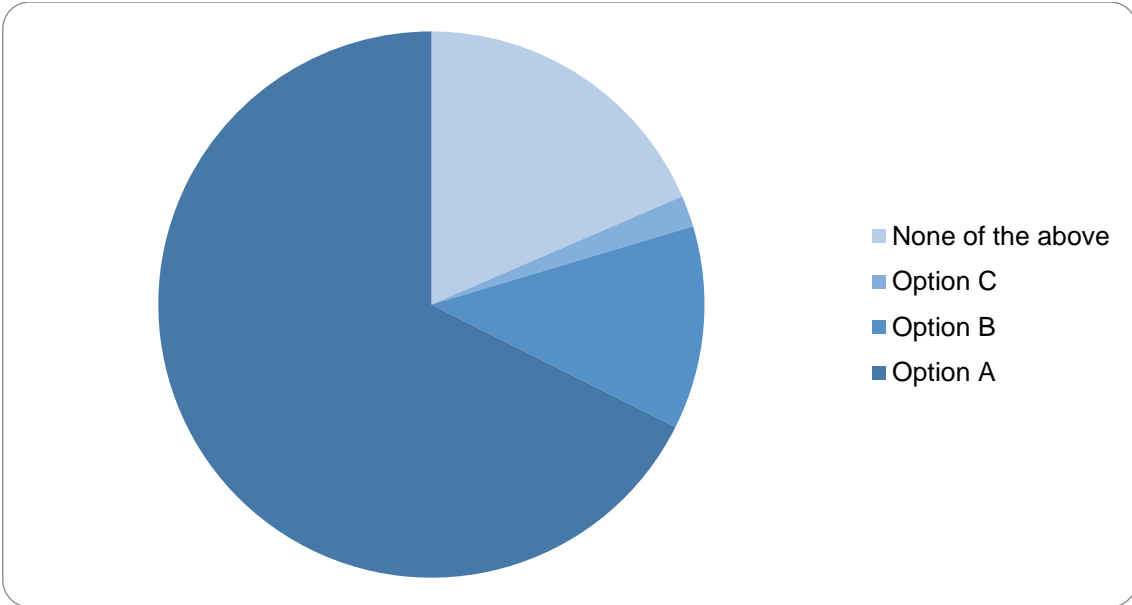
- Comments stated the strategy is over reliant on large scale strategic allocations risking not complying with the NPPF paragraph 70 (to have 10% of all housing requirement to be met on sites of 1ha or less) and not having a 5 Year Housing Land Supply on adoption. These respondents asserted that these sites are at a higher risk of issues with infrastructure provision and delays in delivery, and therefore the plan should increase the number of site allocations to mitigate this risk.
- Linked to their comments on Policy HOU1, many respondents stated that the plan should be increasing the housing supply to reflect their views on a higher housing need for the districts.
- Some comments stated that the plan risks over development, and that the housing numbers for each of the housing sites should be reduced. The plan includes an “excessive” buffer of housing that should be reduced to allow some housing sites to be de-allocated.
- Comments stated that we did not provide enough information on the make up of the housing trajectories for the plan. Comments stated it would be helpful for the councils to provide a breakdown of the expected supply from the allocated sites clearly as part of the trajectory. Other commentators claim we did not provide enough justification for the windfall allowance and are over reliant on this element of the supply.

How the main issues have been taken into account

We have assessed the responses to the consultation and consider that the proposed housing supply for the plan is sound. Our 2023 Housing Land Supply Statements provide a housing supply for each council, alongside a detailed assessment of housing sites’ likely delivery rates. We will publish an updated version of these statements to demonstrate the land supply for the examination of the Joint Local Plan as this will be in a different monitoring year to when we consult on the proposed submission plan.

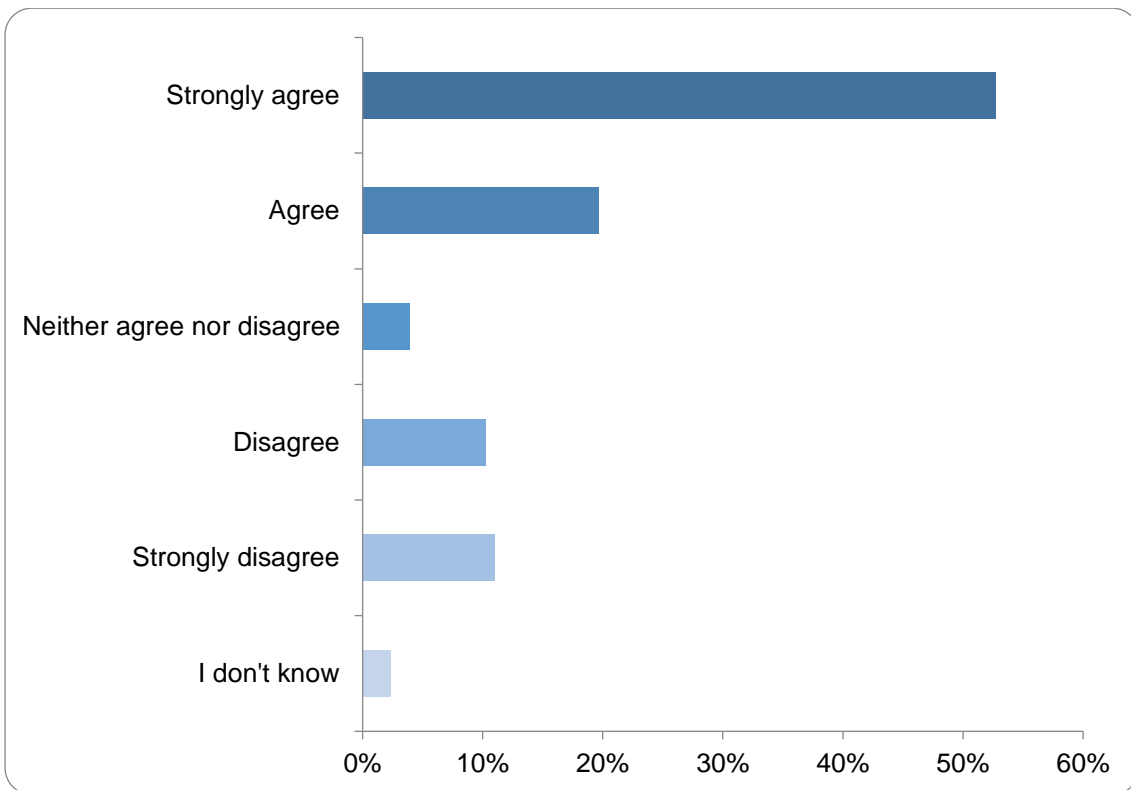
Policy HOU3 – Affordable housing

Full Survey: Which option do you prefer?



Of the 108 people who responded to this question, 68% preferred Option A. 482 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 127 people who responded to this question, 73% either agreed or strongly agreed with the proposed draft policy wording. 463 people did not answer.

Full Survey: Summary of main issues raised

- Some comments acknowledged and supported the policy's aspiration to address housing affordability as a significant issue in our districts, and as such justifies a 50% or higher requirement for affordable housing on new developments. Some pointed out that it allows consistency across the districts, and brings the contribution in line with the edge of Oxford sites in the adopted South Oxfordshire Local Plan 2035 where we require a 50% contribution already.
- Conversely, some responders argued that the 50% target is unrealistic based on past delivery, and noting targets are being lowered elsewhere in county. Some consider this could have an unintended effect, making brownfield developments less attractive.
- In a similar vein, comments also raised concern about the lack of viability evidence to justify the target and tenure mix particularly given the other additional costs that other policies place on developments. Some highlighted that this would likely impact negatively on small and medium sized developers.
- Some responders proposed an alternative approach to setting targets, including setting different targets for different areas of our districts, or site-specific targets reflecting cost associated with each site.
- Some argued that sites should be able to provide their own viability evidence to justify a non-policy compliant level of affordable housing.
- Some comments argued that the councils could address the need for affordable housing by increasing the housing requirement and total number of homes being delivered, rather than raising the amount of affordable homes each site has to deliver.
- There were a number of comments supporting the tenure mix. However, others considered it may not be appropriate in all locations, or suggested a preference for a particular tenure type. Some responders raised concern with how the tenure mix was shown as part of the overall development rather than as a proportion of the affordable housing target.
- Some supported the proposed 25% target for First Homes, while others considered that it restricted the delivery of other forms of affordable ownership.
- Some comments supported a lower threshold for seeking affordable housing within national landscapes, while others suggested the lower threshold should be cover additional areas.
- Concern was raised about the approach to seeking affordable housing for specialist housing for older people. Some consider a one fits all approach does not reflect different types of accommodation, costs, uses and facilities. Some suggested these schemes should be exempt from providing First Homes.

Reading Borough Council supported new affordable housing to meet the needs of South Oxfordshire's residents, preventing pressure on neighbouring areas. However, viability evidence to support this target is needed to ensure that 50% is the maximum that could be achieved. It is unclear whether seeking affordable housing provision on

non-rural sites of 10 dwellings or fewer has been explored to boosting affordable housing supply.

Oxfordshire County Council supported Option A which seeks 50% provision of affordable housing and the inclusion of standards for specialist elderly accommodation. The difference between this policies provisions and those made in the Oxford City Plan and how this relates to unmet need where noted. The county council also asked for further clarity on how the councils would secure the provision of affordable extra care.

Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (ICB) suggested that the Councils consider the need for affordable housing for NHS staff and those employed by other health and care providers. They recommend that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). They ask that the Councils consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

How the main issues have been taken into account

We do not consider affordable housing need to be an exceptional circumstance for departing from the standard method. Our approach to the level and tenure mix of affordable housing in Policy HOU3 was to address the needs of as many households identified through the Joint Housing Need Assessment (2024) as reasonably possible. The lower than major development threshold for requiring affordable housing in National Landscapes is in accordance with national policy. Our approach in this policy, and in Policies HOU12 and HOU13 is to support the delivery of affordable housing in rural areas. We have now viability tested this policy, including the requirements relating specialist housing for older people alongside the cumulative ask within the plan, and we have taken this into account in updating this policy.

Policy changes include:

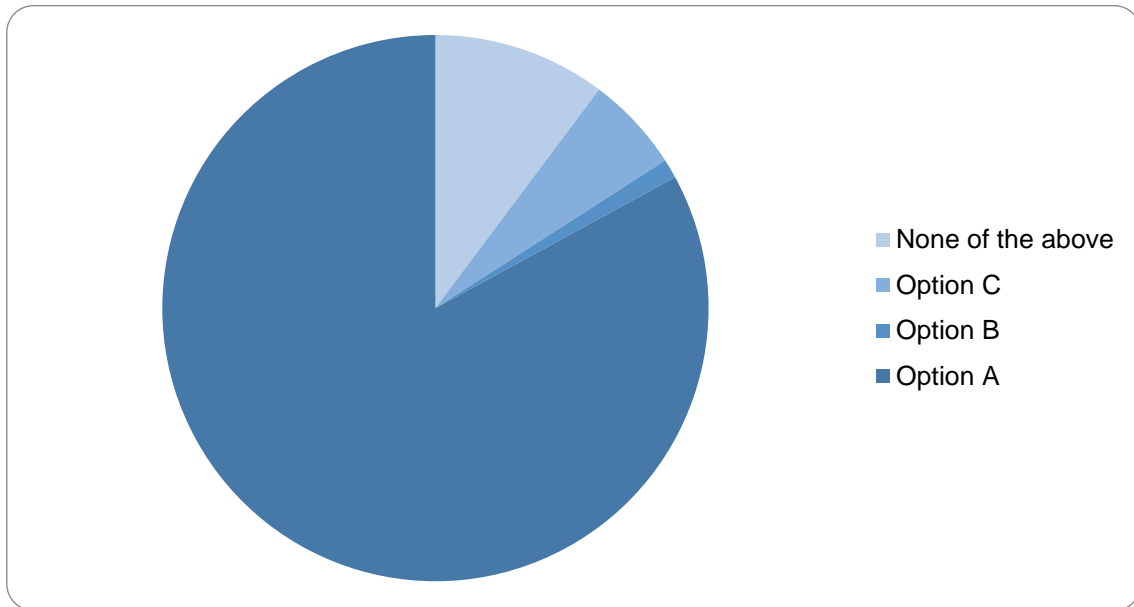
- We have made amendments to Policy HOU3 to reflect the recommendations of our viability assessment that identified some of the requirements as being unviable. We have lowered the level of affordable housing required for developments in the Vale of White Horse to 40%, as the 50% target was unviable. We have also amended the tenure mix for both South Oxfordshire and the Vale of White Horse, however we still prioritise the delivery of social rents. We have reduced the discount on market value that First Homes would be expected to make from 50% to 30%, which has resulted in less need for this type of affordable housing (as fewer households can afford the 30% discount).
- We have added additional wording to the policy and supporting text to make it clear that Neighbourhood Planning groups can seek higher levels of

affordable housing and require a larger discount to First Homes, where this would be viable to do so.

- Finally, we have set out specific targets within the policy for affordable housing from specialist older persons housing, with supporting text to provide detail on how this is to be implemented.

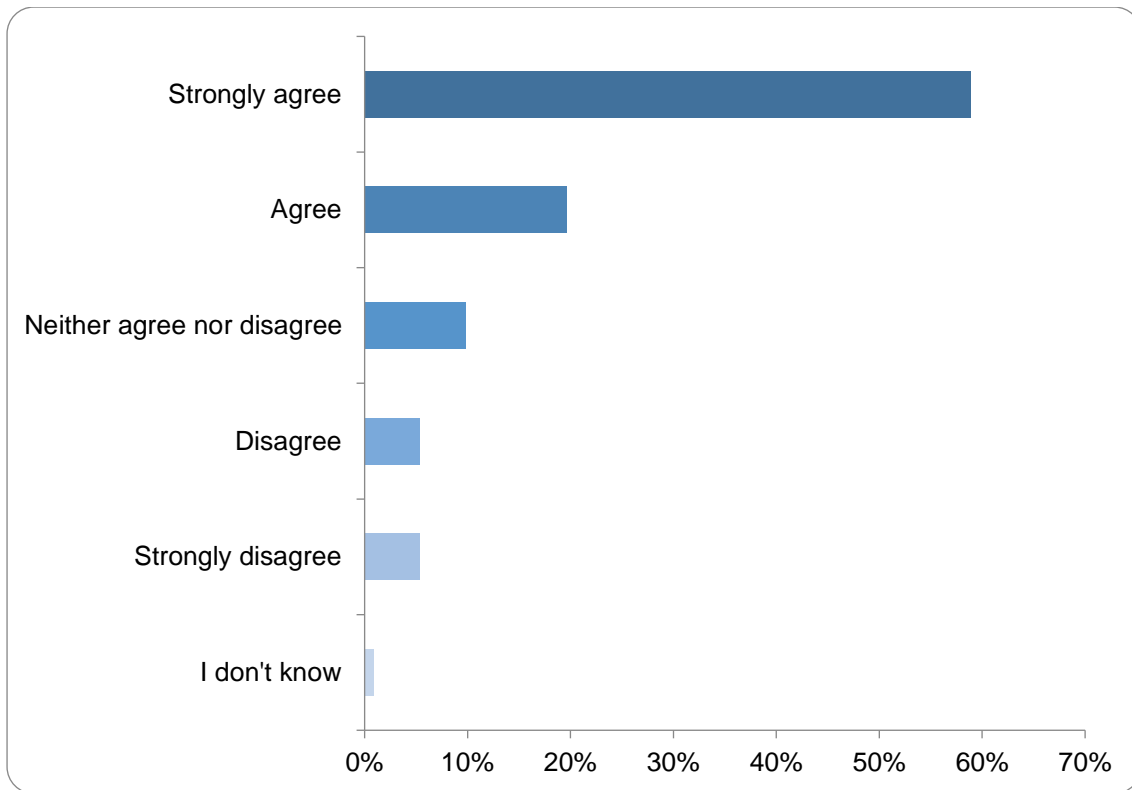
Policy HOU4 – Housing mix and size

Full Survey: Which option do you prefer?



Of the 88 people who responded to this question, 83% preferred Option A. 502 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 112 people who responded to this question, 79% either agreed or strongly agreed with the proposed draft policy wording. 478 people did not answer.

Full Survey: Summary of main issues raised

- Respondents asked that the policy should have local flexibility, that the standards shouldn't be overly prescriptive, and that the council should regularly review housing mix evidence
- Some responses stated that the councils will need to support any accessibility standards with evidence of need and viability. One commentator stated that the aspiration for all homes to be built to M4(2) accessible and adaptable home standards should be removed.
- Respondents stated that the councils should broaden the scope of the policy beyond bedroom numbers arguing that the policy should standards for the provision of bungalows / single-storey housing to enable older residents to downsize. Comments highlighted the overlap between this policy's requirements for accessibility standards and addressing the need for older people in policy HOU5. One retirement village developer advised that older people's needs shouldn't be addressed through ground floor only accommodation.
- There was some support for the commitment in the consultation to examine the effect of housing extensions on our existing housing stock on future need for different housing mix and size
- One comment requested that housing mix should be left to communities to assess through Neighbourhood Plans.
- One comment expressed concern that requiring new homes to meet Nationally Described Space Standards will have implications for the amount of

land that each individual dwelling would require reducing the overall number of homes that sites can deliver

Homes England recommended that the policy has sufficient flexibility to take into account that mix requirements may not be suitable, achievable or viable on all development sites, for example a higher density of development with a greater number of 1- and 2-bedroom properties may be more appropriate in a small town centre site. Therefore, the policy should allow for development proposals to respond to the context and characteristics of sites.

Oxfordshire County Council supported the policy. They suggested the policy reference the need for housing design to be 'tenure blind'. They suggested that the policy considers the changing demographic profile of the population in the districts when calculating the number of accessible homes for older people and for those with a disability.

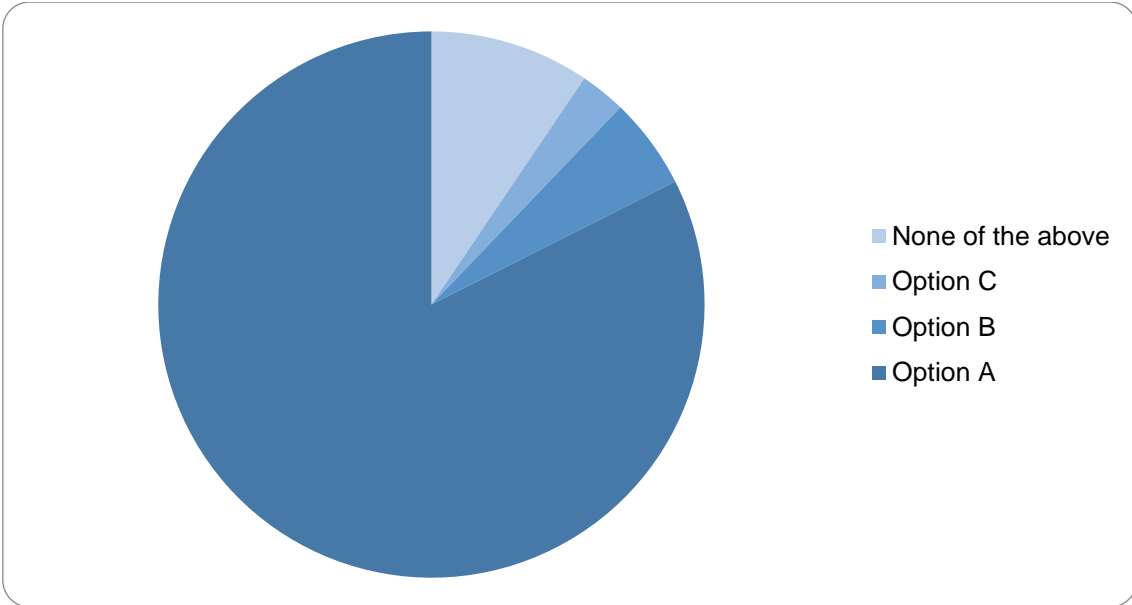
How the main issues have been taken into account

The latest Joint Housing Needs Assessment (2024) presents our evidence on the standards on housing mix and accessibility, which are now shown in the updated Policy HOU4. We have decided to continue the approach for space standards in our adopted local plans in the proposed submission plan. We have subjected the standards in this policy to viability testing. The policy will set the councils standards for these areas, and applicants who consider that there are site specific reasons why they cannot achieve them will need to demonstrate there are material considerations to depart from the policy. Neighbourhood planning groups would be able to set their own housing mix standards where they have evidence of local need that is different from what we have identified in this policy.

We agree that the policy does overlap with Policy HOU5 (Housing for older people), and the policy reflects the councils' strategy to encourage people to remain in their home rather than having to move to costly supported living or bespoke retirement accommodation.

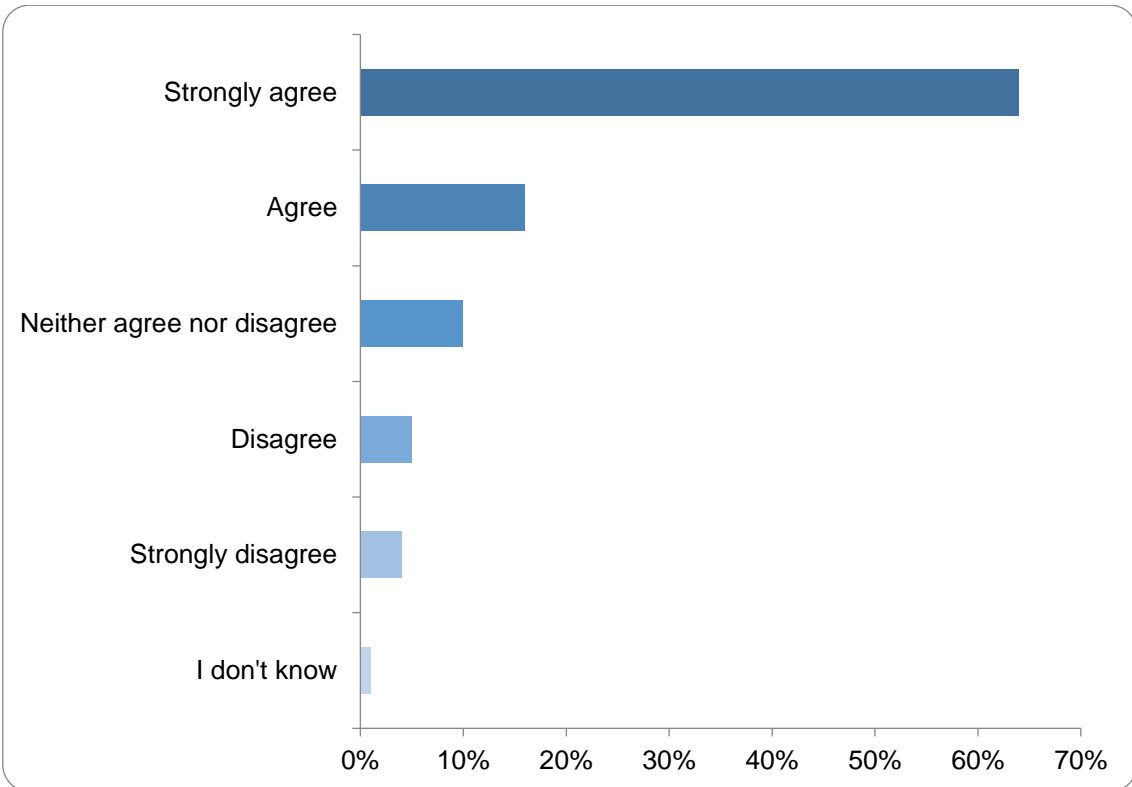
Policy HOU5 – Housing for older people

Full Survey: Which option do you prefer?



Of the 74 people who responded to this question, 82% preferred Option A. 516 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 100 people who responded to this question, 80% either agreed or strongly agreed with the proposed draft policy wording. 490 people did not answer.

Full Survey: Summary of main issues raised

- Comments supported the approach of identifying a need figure for older people's housing, including the need for care homes (C2 use class). The policy would be important to allow downsizing and the release of family homes. One comment agreed that the approach represents a flexible, proactive approach to the delivery of specialist housing for older people
- Many comments argued that the councils should meet the identified need for older person's in full, including through specific site allocations on the edge of settlements. One retirement village developer said that we shouldn't be meeting the needs of older people on our existing housing sites, as they are not "usually within close proximity of existing amenities and facilities". Others questioned the proposed site threshold of 500 or more homes as a suggestion for sites required to make contributions to older people's accommodation, or that specialist older person accommodation on these sites could render them unviable. Another commentator suggested that the councils should have no strategy for the provision of older person's accommodation, and simply let the market decide where these should be built.
- Comments asked that the plan provides for a broader range of accommodation types (such as bungalows, ground floor only housing, or intergenerational living), in different locations. They noted that older people wish to stay near their existing community / friends / family, and that accommodation should be well located to facilities, public transport and health care. Where bespoke older person's accommodation is provided, the operators should ensure that the facilities are also open to the wider community to access, and integrated with new or existing communities.
- One comment did not support the inclusion of bungalows as they are an inefficient use of land and materials.
- One comment questioned the 55 and over threshold for defining older people, and that age should be one of several specific criteria (such as pensionable age, disabilities, need for specialist accommodation).
- They felt housing for older people should be considered in conjunction with Neighbourhood Plans.
- One response asked for residential mobile homes to be part of the mix to provide individual, small, low-maintenance accommodation for older people, thereby broadening the type and mix of homes and enabling more older people to downsize from their underoccupied family homes.

The **NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board)** welcomes this policy. They suggested potential developers should provide robust evidence to identify appropriate mitigation measures to accommodate this extra demand of primary healthcare services. Health Impact Assessment, consulted with NHS, should also be submitted as evidence to demonstrate the provision for older persons and other specialist accommodation would not exacerbate the capacity of the nearby existing primary healthcare provisions.

Oxfordshire County Council welcomes this policy. They suggested that sites proposing 500 or more dwellings should provide a minimum of 60 units of affordable rental extra care housing. They also suggested affordable extra care housing should

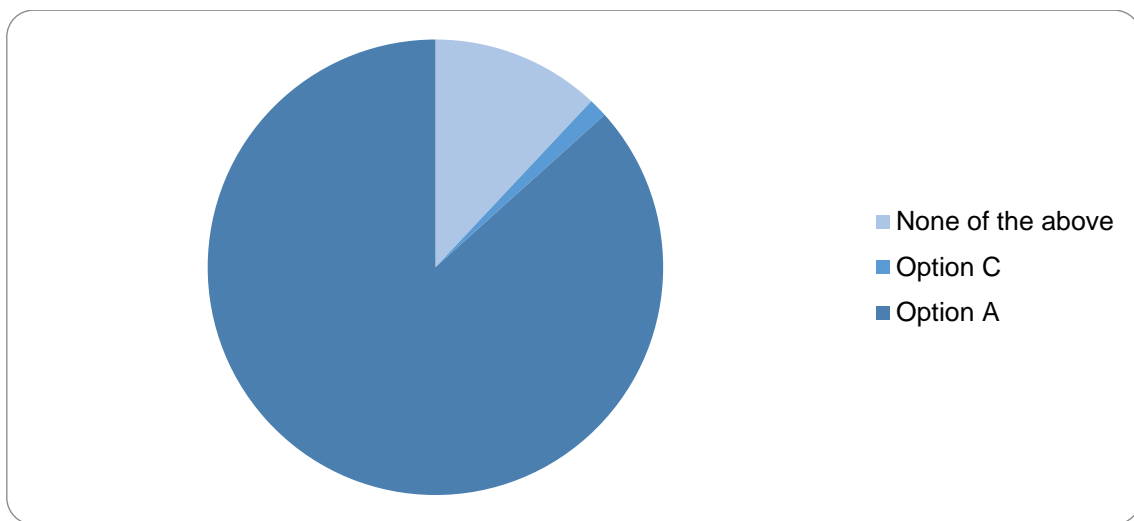
be provided on large strategic sites, particularly Bayswater Brook, Grenoble Road and Northfield.

How the main issues have been taken into account

Since our Preferred Options Consultation, our consultants have provided a later draft of the Joint Housing Needs Assessment (JHNA) that identifies the need for older people in our districts. We have amended the policy to take account of this need, setting out a specific approach to addressing these needs in full. The need is split between two groups: housing with support (a no or low intensity care need, age restricted housing) and housing with care (medium to high intensity care need). The JLP addresses the former need through the housing mix policy (requiring accessible and adaptable homes) and by requiring proposals for ten or more homes to design 5% of homes for older people. The policy addresses the need for housing with care through requiring our large scale major developments and allocations to provide extra care accommodation. Collectively, this approach will meet the need for older people in full, and so we don't need to make any further allocations as suggested by some developers / site promoters.

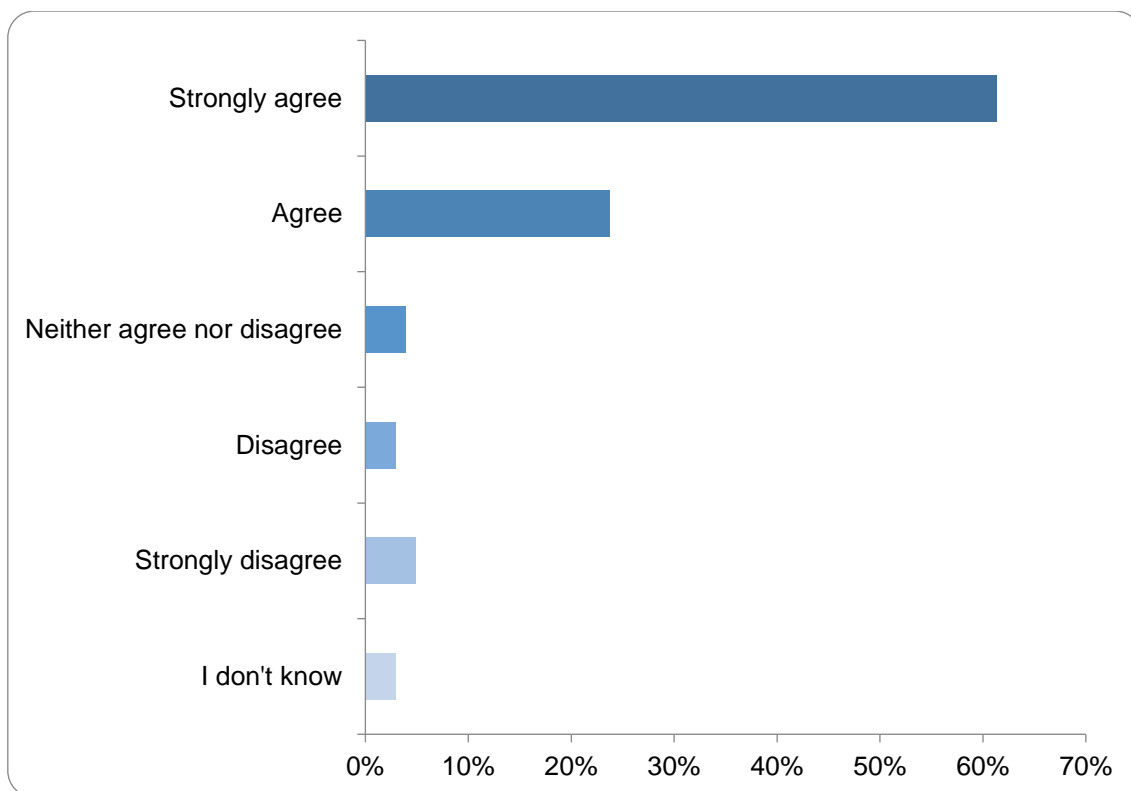
Policy HOU6 – Self-build and custom-build housing

Full Survey: Which option do you prefer?



Of the 75 people who responded to this question, 87% preferred Option A. 515 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 101 people who responded to this question, 85% either agreed or strongly agreed with the proposed draft policy wording. 489 people did not answer.

Full Survey: Summary of main issues raised

- Support delivery on allocated sites to provide a range and mix of housing types subject to need and viability
- Support in lieu of affordable housing on large sites and removal of permitted development rights to ensure its not lost from affordable sector. Others suggested Permitted Development rights should not be removed.
- Objections were made to the approach to seeking plots on large scale residential allocations. Concerns included it not reflecting the type of plots people wish to develop, challenges of managing delivery alongside mainstream housing citing uncertainty around delivery, consistent design and access arrangements, the level of demand being unrealistic resulting in delays in building out. Some suggested alternative approach to seeking plots on case by case rather than require fixed percentage.
- Comments were received suggesting it is not possible to comment on whether the requirement is justified without evidence for the need for plots.
- Some suggested a more flexible strategy required to facilitate provision of a range of sites and locations, including allocating specific self-build sites.
- Concern about potential impact on character and whether self-build housing would meet net zero targets
- Concern regarding CIL exceptions for self-builders and loss of funding particularly in rural area where growth is more limited

- concern was raised that marketing period is too long and may negatively impact in build out rates.
- Some suggested the policy was not in line with legislation, in that it does not refer to the duty to grant sufficient permissions to meet demand and by seeking to apply local eligibility criteria to the register. Others were concerned that 'shell homes' do not comply with legal definition of a serviced plot.

How the main issues have been taken into account

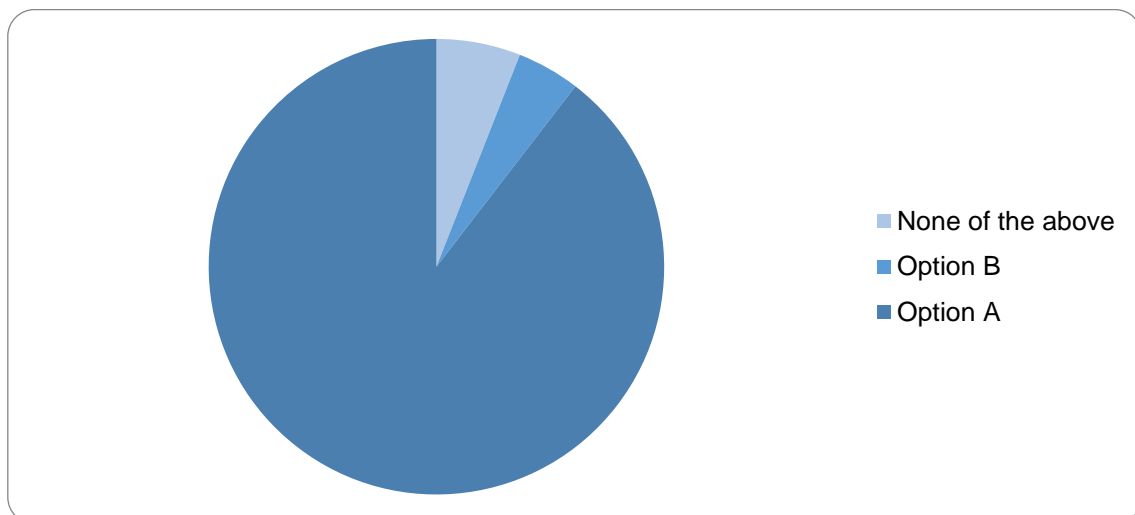
Our approach of requiring self and custom build plots on large scale residential sites continues the approach taken in the adopted South Oxfordshire Local Plan 2035. Respondents have raised concerns about the relationship between these plots and the overall site, however these issues can be overcome through effective legal agreements, site management, and effective masterplanning of these sites. We wanted to focus self and custom build housing in sustainable locations with good access to services and facilities, and making provision for them on our large-scale residential allocations achieves this objective. This will address the need for plots, but our strategy would not stop additional, suitable sites for self and custom build housing coming forward in suitable locations.

Policy changes include:

- We have made a change to the policy, clarifying that large scale major developments will need to deliver 5% of homes as plots for self and custom housebuilders.
- We have also amended Policy HOU3 (Affordable housing) which will also affect self and custom build sites.
- Finally, we have changed the length of time that a developer will need to market plots to self and custom builders from 12 months to 6 months. This is to ensure that this policy does not act as barrier in bringing development forward. We have added supporting text explaining the marketing process.

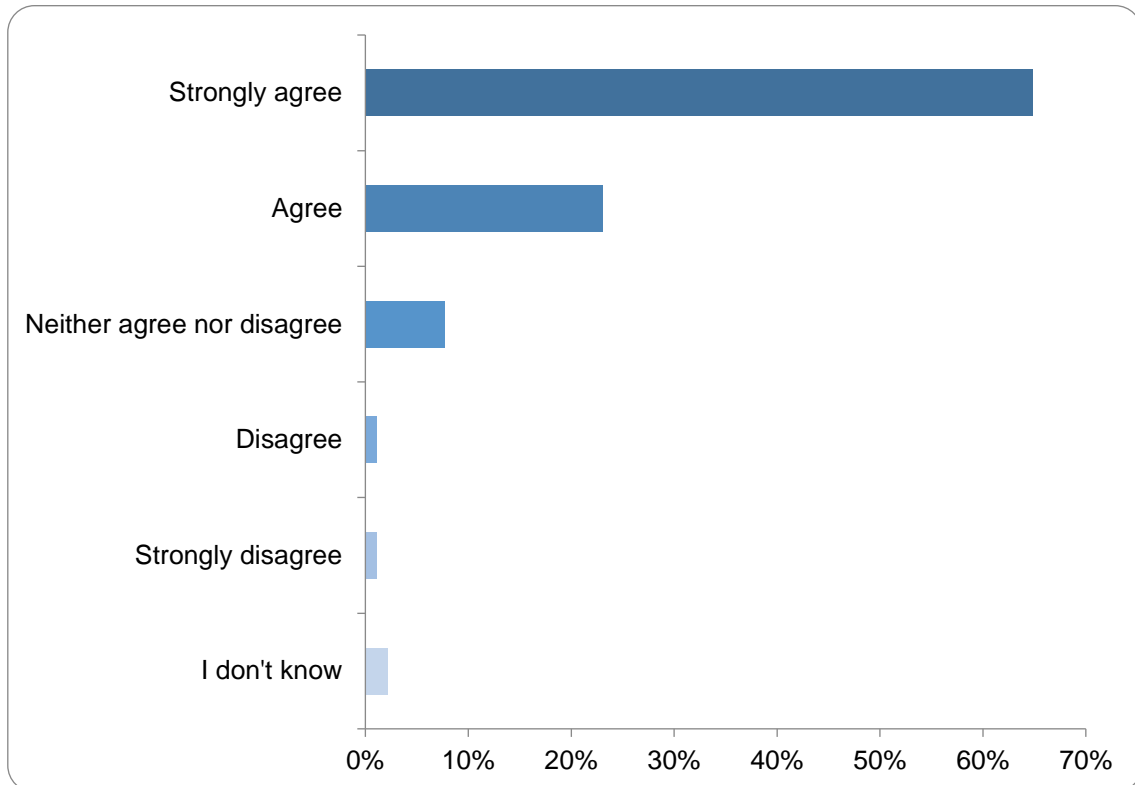
Policy HOU7 – Affordable self and custom-build housing

Full Survey: Which option do you prefer?



Of the 67 people who responded to this question, 90% preferred Option A. 523 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 91 people who responded to this question, 88% either agreed or strongly agreed with the proposed draft policy wording. 499 people did not answer.

Full Survey: Summary of main issues raised

- There was support for Option A.
- Concern was raised the maximum size of an affordable self-build dwelling is too small, (3 bed 3 person) as needed for families too.
- The houses should be low-carbon or carbon-neutral.
- Should be provided as affordable rent.
- Support removal of permitted developments rights to extend properties. Although some responders suggested the restriction on permitted development could be waived if the homes are in community ownership
- suggest adding 'stewardship' into the policy so a management plan is developed by and with community at the outset.

How the main issues have been taken into account

National policy supports councils requiring self and custom-build developments to provide affordable self and custom-build plots / homes. Policy HOU7 supports a range of tenure types and housing models to come forward, including affordable rent and ownership. It also provides opportunities for both individuals and groups

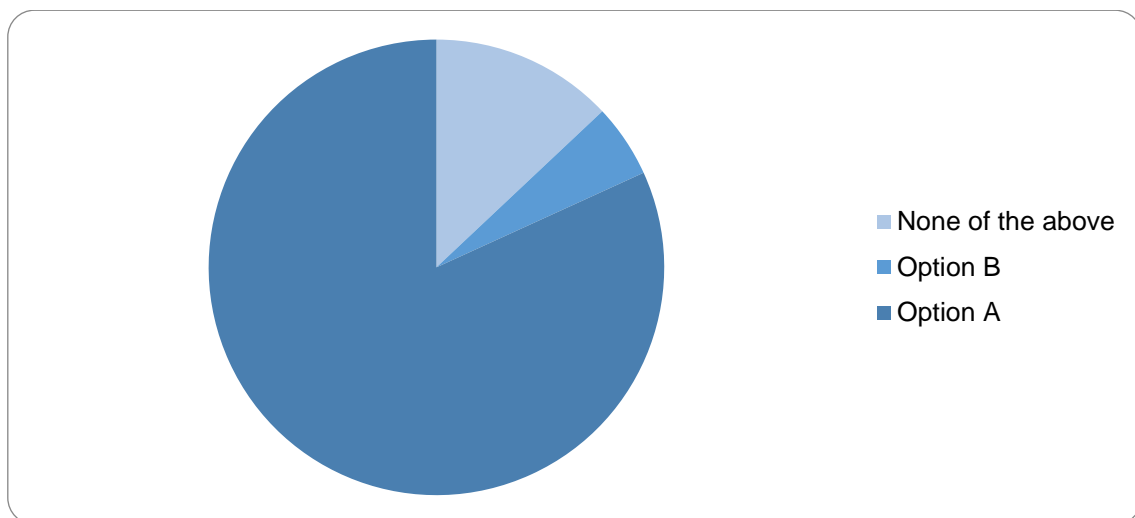
(including community led organisations) to develop affordable self and custom build homes. The policy's removal of permitted development rights does not mean extension are not allowed; it means home owners would need to secure planning permission, allowing the councils to secure the affordability of the property in perpetuity. Proposals for self and custom-build properties, market or affordable, will still need demonstrate compliance with other relevant policies in the plan including those relating to building standards and energy efficiency.

Policy changes include:

- We have amended the policy to make it clear what is meant by affordable self and custom-build housing.
- Similarly to policy HOU6, the length of time plots are required to be marketed has been reduced from 12 months to 6 months, so as to not unduly delay build out.
- We have added supporting text to provide more detail on how applicants will demonstrate an appropriate marketing strategy.
- We have removed references to a maximum size of a dwelling, and instead proposals will need to demonstrate an appropriate mix of plot sizes in accordance with Policy HOU4.

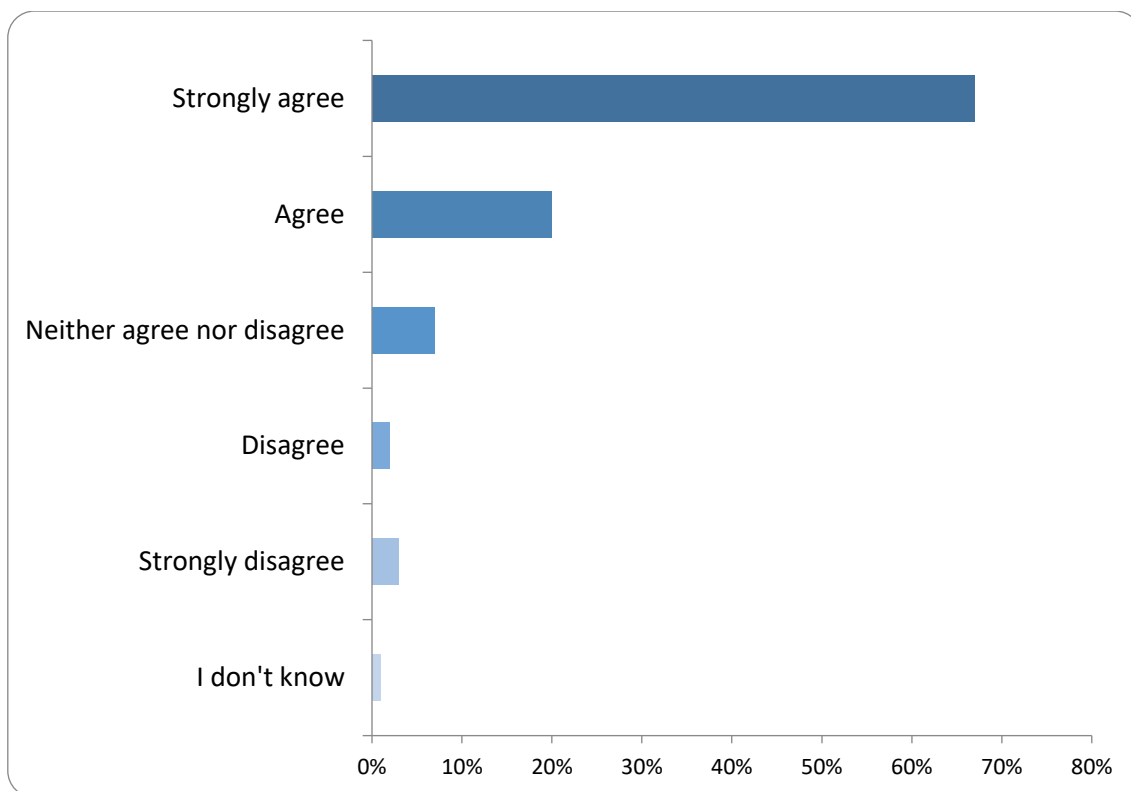
Policy HOU8 – Replacement dwellings in the countryside

Full Survey: Which option do you prefer?



Of the 77 people who responded to this question, 82% preferred Option A. 513 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 100 people who responded to this question, 87% either agreed or strongly agreed with the proposed draft policy wording. 490 people did not answer.

Full Survey: Summary of main issues raised

- A number of respondents supported the recycling of materials and prioritising re-using buildings over replacing them.
- Some respondents suggested certain aspects of the policy were too restrictive, such as avoiding light-coloured materials.
- Some respondents questioned if it was intended for the policy to exclude abandoned buildings and what the purpose of that would be.
- Respondents supported the requirement for buildings to not be materially larger than the dwelling it is replacing within the Green Belt, and others suggested this should be applied to other locations such as the National Landscapes or all areas outside Tiers 1-4.

North Wessex Downs National Landscape Board would like Part f of the policy to apply to National Landscapes.

Historic England supported this policy, especially Part 2.

Oxfordshire County Council's Climate Action Team suggested that duplication of the requirements of Policy CE3 is unnecessary, as the plan should be read as a whole.

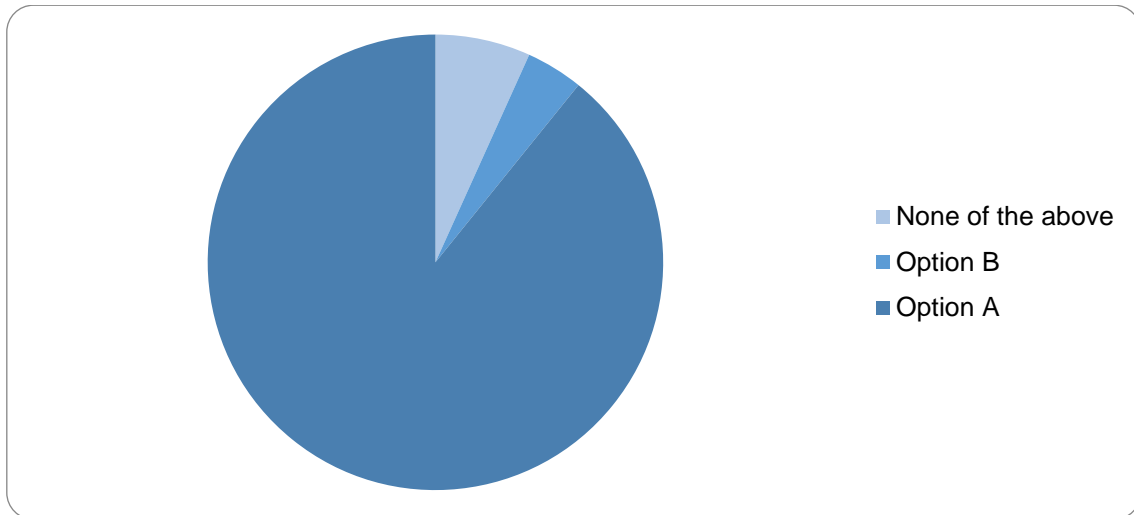
How the main issues have been taken into account

Due to the importance of re-using, retaining and retrofitting existing buildings in reducing embodied carbon, the reference to Policy CE3 has been retained in the

policy. The policy has been edited to be clear that it would apply to all existing dwellings that can be lawfully used for residential purposes. Restrictive references to certain types of materials and glazing have been removed, as the application would still need to consider policies relating to design and light pollution. The requirement for any replacement dwelling to not have a greater harm on the character of the area due to its scale, height, size, form and materials has been clarified.

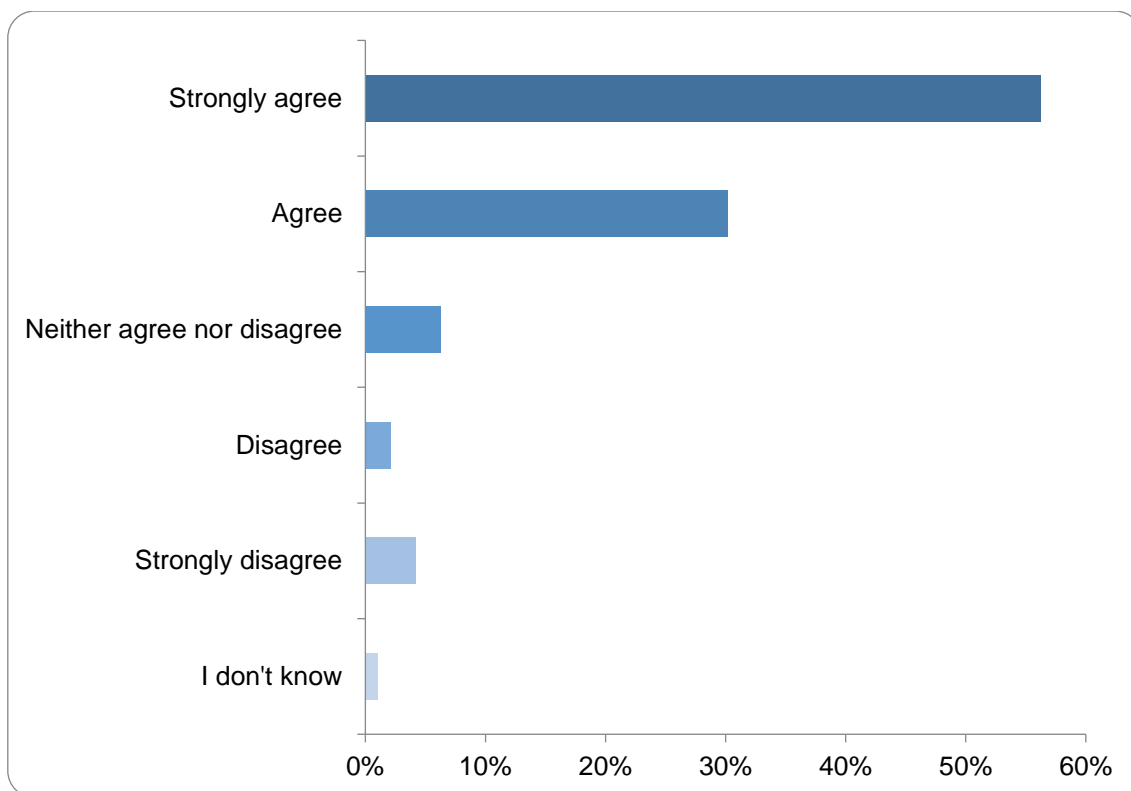
Policy HOU9 – Sub-division of houses

Full Survey: Which option do you prefer?



Of the 74 people who responded to this question, 89% preferred Option A. 516 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 96 people who responded to this question, 86% either agreed or strongly agreed with the proposed draft policy wording. 494 people did not answer.

Full Survey: Summary of main issues raised

- There was support for the subdivision of dwellings to help increase the overall housing stock, and particularly smaller affordable homes, with minimal upfront carbon cost.
- Some respondents suggested the policy should require sub-divided houses to be provided in line with the nationally described space standards, and others suggested the policy should require larger homes to be designed to be easily subdivided in the future.
- Some respondents noted that national policy supports the sub-division of dwellings in the countryside, and therefore it should not be limited to the settlement hierarchy.
- Others commented that sub-divisions can result in negative impacts for parking.

Historic England objected to the policy as currently drafted. They raised concerns that the policy does not reference the heritage significance of the building and suggest adding a new criterion.

How the main issues have been taken into account

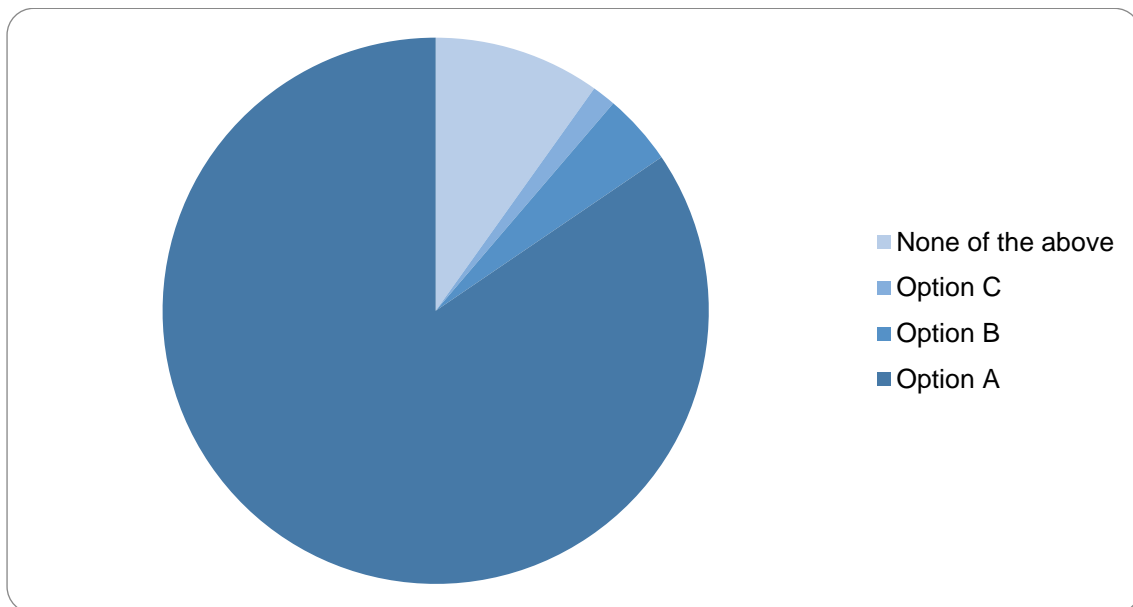
The policy has been edited to remove the reference to the settlement hierarchy to reflect the position of the NPPF that sub-divisions are appropriate in the countryside. Reference to good access, bin storage and cycle and car parking provision has been added to the policy, to address concerns about the impact on amenity. The plan

would be read as a whole, therefore the heritage policies and requirements related to building size, would be applied to applications for sub-divisions. It is not necessary to reference every consideration within this policy for it to be given full regard. It is beyond the scope of the policy to require larger homes can be designed with future sub-division in mind. Therefore, these additions were not made to the policy.

Policy HOU10 – Meeting the needs of Gypsies, Travellers and Travelling Showpeople

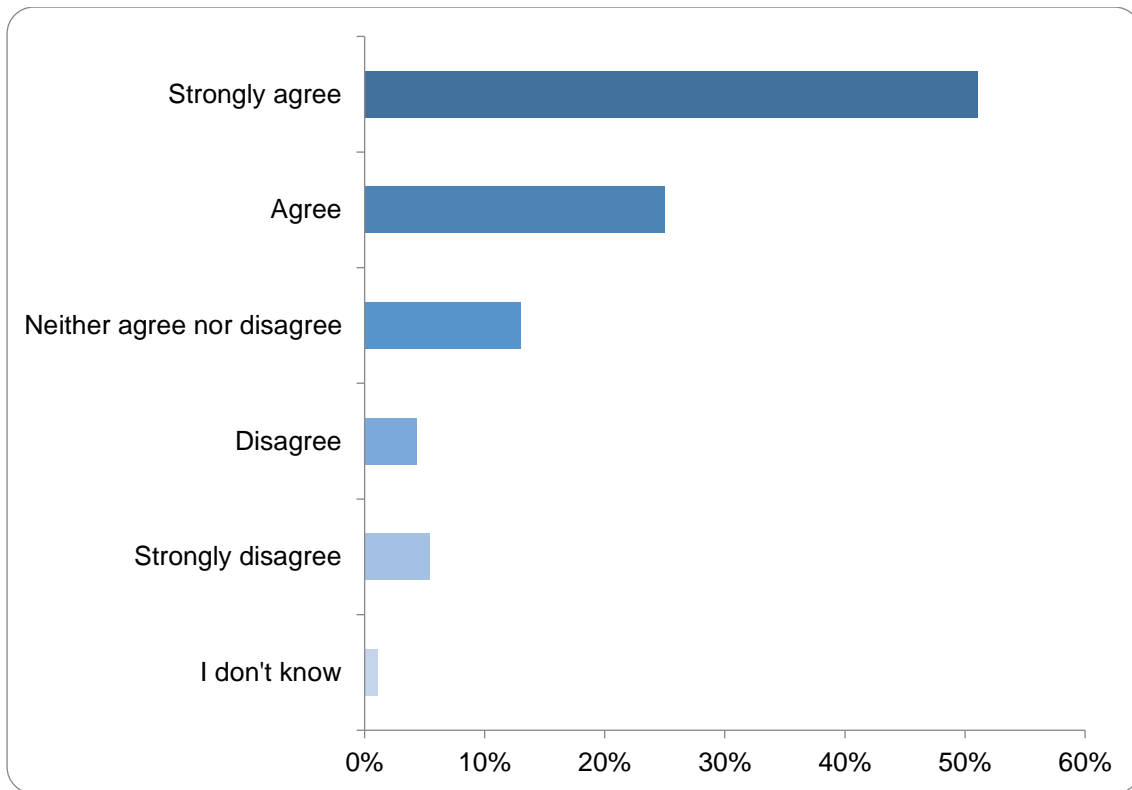
Full Survey: Which option do you prefer?

Of the 71 people who responded to this question, 85% preferred Option A. 519 people did not answer.



Full Survey: How far do you agree or disagree with the proposed draft policy wording?

Of the 92 people who responded to this question, 76% either agreed or strongly agreed with the proposed draft policy wording. 498 people did not answer.



Full Survey: Summary of main issues raised

- A number of comments were made not supportive of additional provision through the plan.
- Some respondents raised concern regarding the lack of an identified need or detail on where provision is to be made.
- Some questioned how effective the policy will be in preventing unauthorised encampments.
- A number of comments were received on how the need could be addressed, with some supporting or objecting to different approaches:
 - Support for expanding existing sites, as this would co-locate provision in order to build and support that community.
 - Support for specific stand alone sites being identified.
 - Objection to provision being made within the Green Belt.
 - Objection to provision on housing led allocations or where there is a planning application on a site which has reached an advanced stage. Reasons for this objection included concern it would not be compatible with infrastructure requirements and site layout.
- Some respondents suggested that there is a discord between the stated hierarchical approach to the provision of pitches and the proposed policy which only seeks provision from the housing sites listed in the policy.
- There was a suggestion that the policy should have regard to the specific needs of these communities and individuals in terms of the locations where housing is needed.

Oxford City Council are keen to continue working with all Oxfordshire Districts to assess the needs across the county.

Reading Borough Council supports allocations of pitches and plots to address local need. Reading has unmet need and they seek to work with adjoining authorities to understand how those can be met and to discuss meeting the wider needs in the area.

Historic England are interested to see the outcome of future site work.

How the main issues have been taken into account

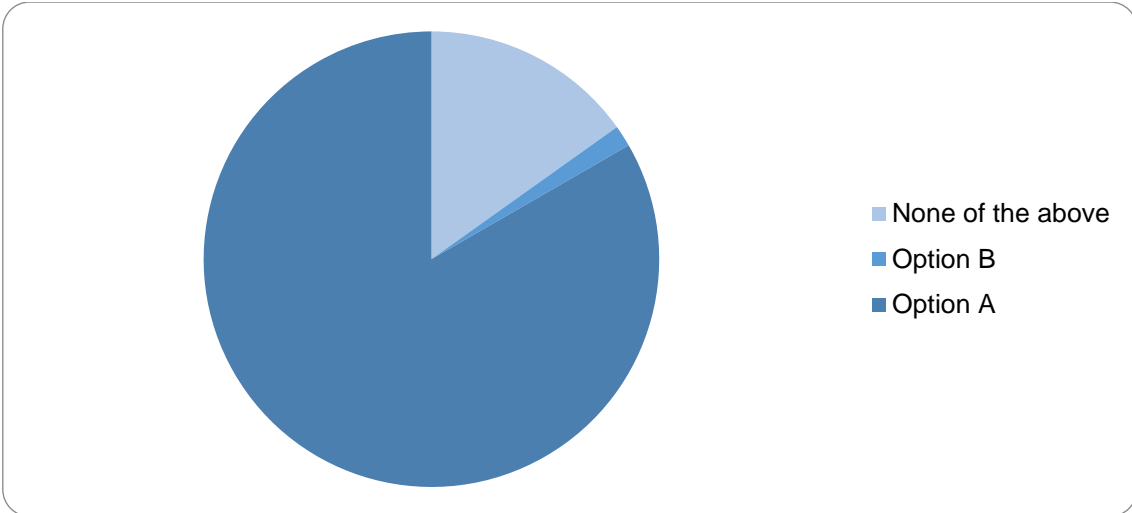
The councils have continued to progress work to determine the overall level of need for pitches and plots within each district. The councils consider that it is appropriate to seek provision of pitches at the large housing allocations in the plan. Allocating between 6 to 10 pitches on each of the housing allocations within the plan allows us to consider the needs of Travellers at the outset of the design process and properly integrate the pitches into the design of the development. This approach also supports key objective of government's planning policy for traveller sites (PPTS), ensuring sites are sustainable. The allocations offer the opportunity to provide a settled base where households can access appropriate health services and ensure that children can attend school nearby.

In developing the policy we acknowledge that some of the large housing allocations in the plan are at an advanced stage in the planning process and it would not be appropriate to seek provision for these sites, where it would not be achievable.

To respond to the point made on a hierarchical approach, we have reorganised Policies HOU10 and HOU11, so that HOU10 covers all matters relating to the supply of new pitches, including new pitches on allocated housing sites and a criteria-based policy for windfall sites. The policy and supporting text for HOU10 now provide support for additional pitches to come forward outside the housing allocations where they meet the criteria in Part 2 of the policy, this includes through intensifying and expanding existing sites, regularisation of unauthorised sites or on sites with temporary permission.

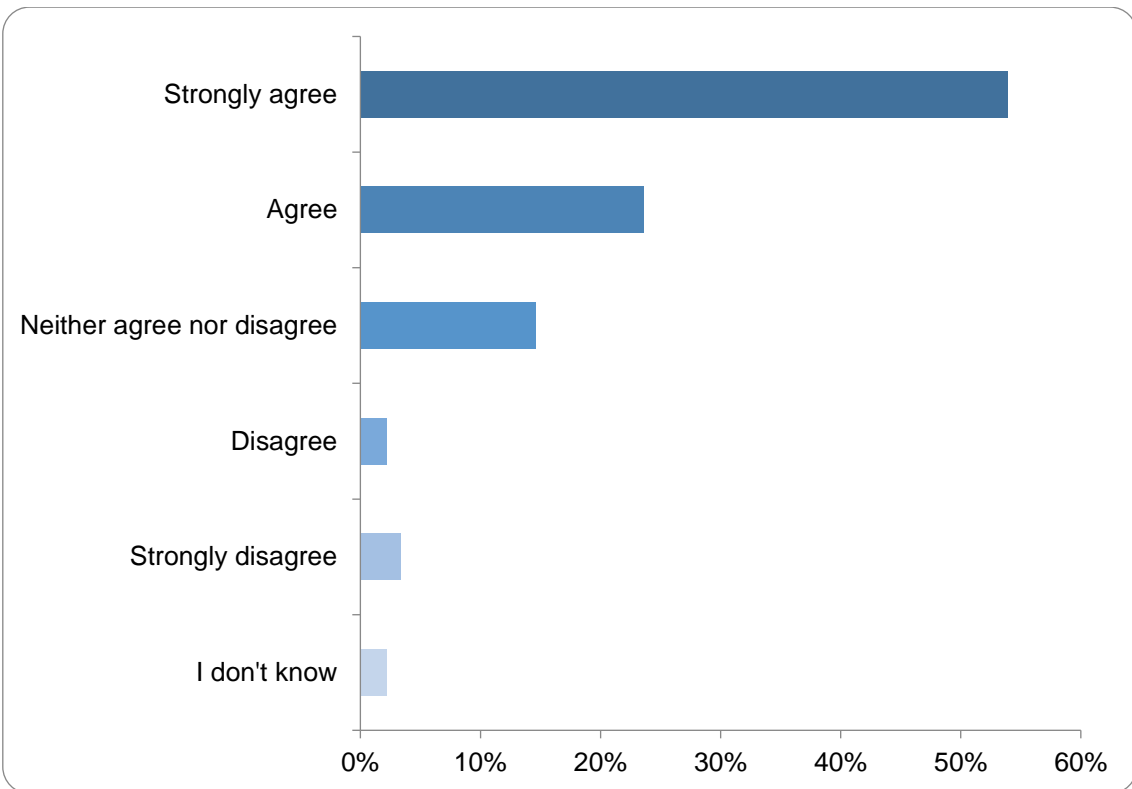
Policy HOU11 – Proposals for/affecting Gypsies, Travellers and Travelling Showpeople's sites

Full Survey: Which option do you prefer?



Of the 66 people who responded to this question, 83% preferred Option A. 524 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 89 people who responded to this question, 88% either agreed or strongly agreed with the proposed draft policy wording. 501 people did not answer.

Full Survey: Summary of main issues raised

- Comments on this policy expressed that additional provision was not supported.

- There was concern expressed over the lack of detail as to where provision will be made.
- Comment acknowledging evidence base still in progress
- Some comments stated that proposals for pitches/plots in the Green Belt should not be supported.
- It was suggested that Part (e) puts the onus on applicants to ensure community cohesion, and this is inappropriate and potentially discriminatory.
- Timely provision is important, learning from experience where developers have left delivery of sites to the final phases of developments (or not at all).
- Ensure that proposals (specifically Part (a)) should comply with other policies in the plan including landscape was highlighted.

Historic England encourage the historic environment to be considered in work identifying what constitutes an appropriate location.

How the main issues have been taken into account

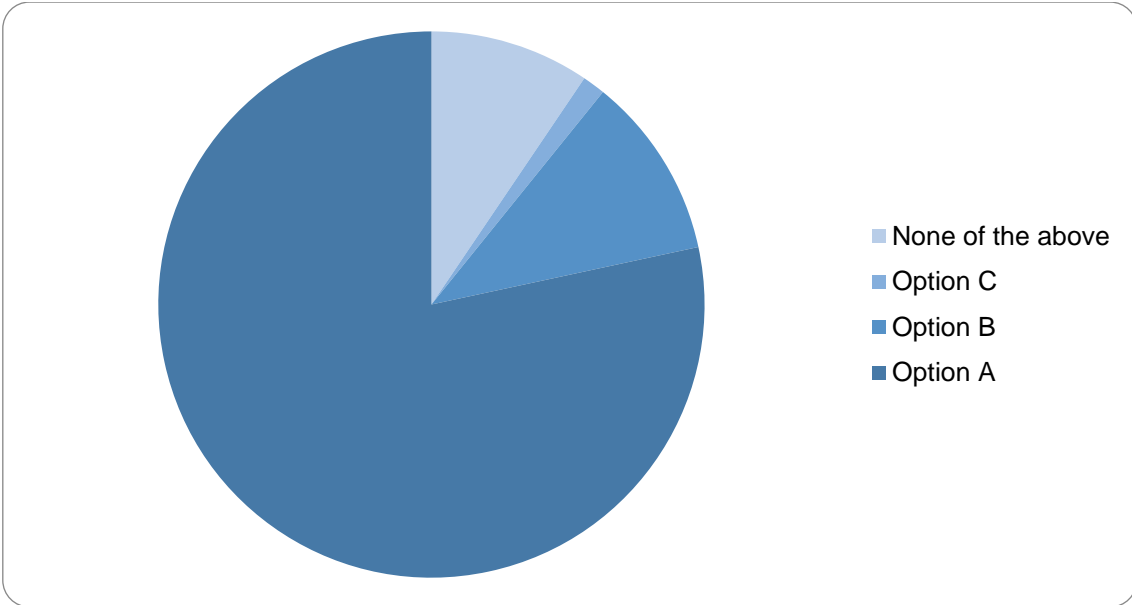
Our approach to Policy HOU11 has sought to provide a fair and effective framework for the consideration of proposals for additional pitches and plots, that takes account of the traditional and nomadic way of life of travellers while respecting the interests of the settled community. Proposals for additional pitches/plots would also need to demonstrate they are in accordance with other relevant policies in the development plan including those relating to landscape and historic environment.

Policy changes include:

- We have amended the policy to remove the section of the policy relating to the criteria that would be used to consider proposals for new pitches and plots and incorporated this into Policy HOU10, so that HOU10 is the policy for covering requirement and supply of new pitches.
- Policy HOU11 now covers proposals affecting existing authorised sites and safeguards them to prevent their loss unless it can be demonstrated the criteria in the policy can be met.
- We have therefore updated the title of the policy to Safeguarding existing Gypsy, Traveller and Travelling Showpeople's sites.

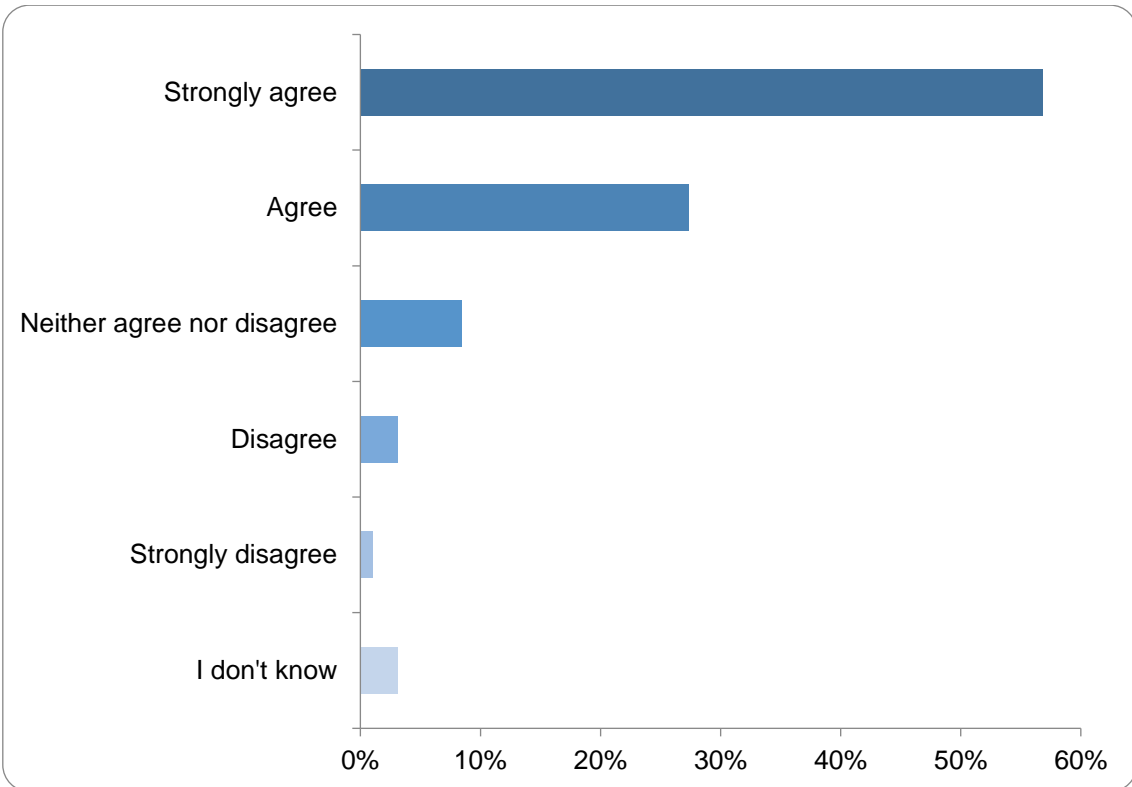
Policy HOU12 – Rural and First Homes exception sites

Full Survey: Which option do you prefer?



Of the 74 people who responded to this question, 78% preferred Option A. 516 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 95 people who responded to this question, 84% either agreed or strongly agreed with the proposed draft policy wording. 495 people did not answer.

Full Survey: Summary of main issues raised

- Support Option A where there is an identified need and affordable homes secured in perpetuity.
- Some supported the requirement for minimum 75% of dwellings to be affordable, while others thought it was too high or not high enough.
- Objections were made to the policy supporting development in locations contrary to the spatial strategy as it risks unsustainable development and encroachment into the countryside.
- Some considered Option B to be more appropriate and restrict development in Green Belt and National landscapes. While others supported the approach for rural exemption sites as an exemption to normal Green Belt policy.
- Others considered it was not necessary to have a policy as it duplicates national policy.
- Support was given to the policy wording which would confine schemes to areas that do not form an isolated development and have access to local services and facilities. However, some responders considered the wording is unclear what 'adjacent' and 'access to local facilities' means and could be exploited. Others considered the criteria could include sites which have good transport links but aren't adjacent to existing settlements.
- Comments suggest the policy should include additional criteria to including consideration of loss of agricultural land, landscape, design and cumulative impacts of these developments.
- objections were made to arbitrary exception site size criteria identified in Policy HOU12 Parts 1(d) and 2(d) when considering the proportionality of schemes, stating this is in conflict with the NPPF and would not positively support opportunities to bring forward rural exception sites.

How the main issues have been taken into account

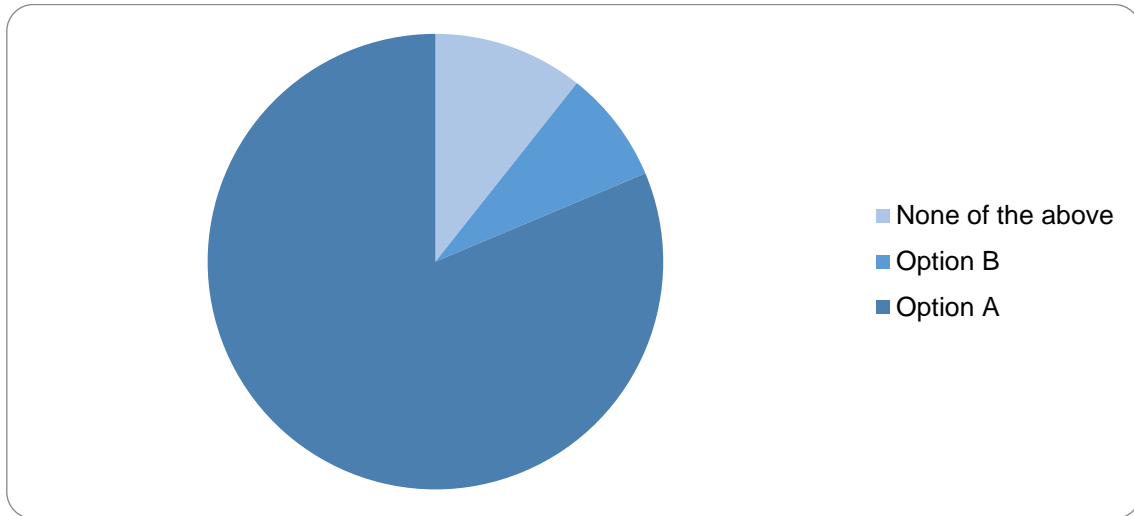
Our approach to Policy HOU12 is in accordance with national policy, which is clear where this form of development should be supported and when market housing can be supported. We are supportive of these schemes where a need is demonstrated and it complies with the other criteria in the policy, including not forming isolated development. This will help ensure much needed affordable housing is delivered, while minimising the potential negative impacts of development in more rural locations. We acknowledge aspects of the policy potentially conflicted with national policy, and have made some changes to reflect this.

Policy changes include:

- We have amended Policy HOU12 to remove prescriptive size limits for these types of schemes.
- Our approach now confirms permission will only be granted for small sites and sets out how we will consider the proportionality of schemes.
- We have amended the criteria in the policy to ensure other relevant consideration are taken into account.
- We have also clarified through the supporting text what is meant by the requirement for schemes to have access to local services and facilities.

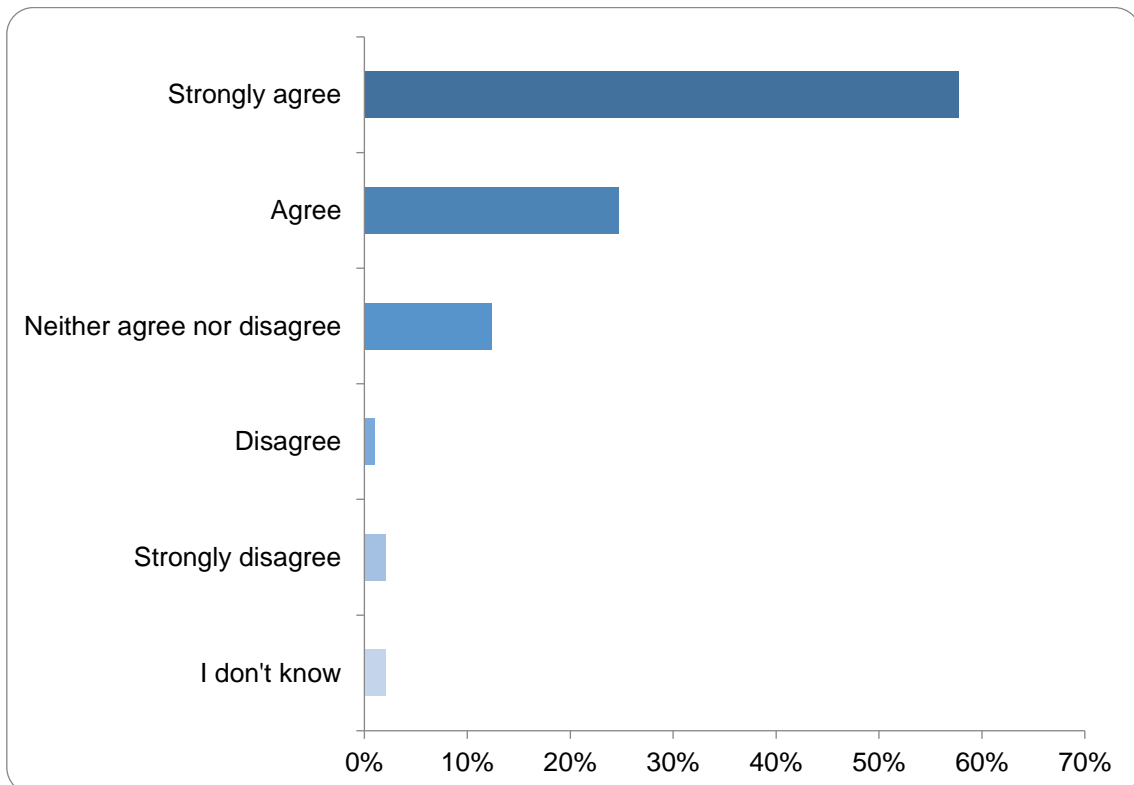
Policy HOU13 – Community-led housing development

Full Survey: Which option do you prefer?



Of the 75 people who responded to this question, 83% preferred Option A. 515 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 55 people who responded to this question, 83% either agreed or strongly agreed with the proposed draft policy wording. 535 people did not answer.

Full Survey: Summary of main issues raised

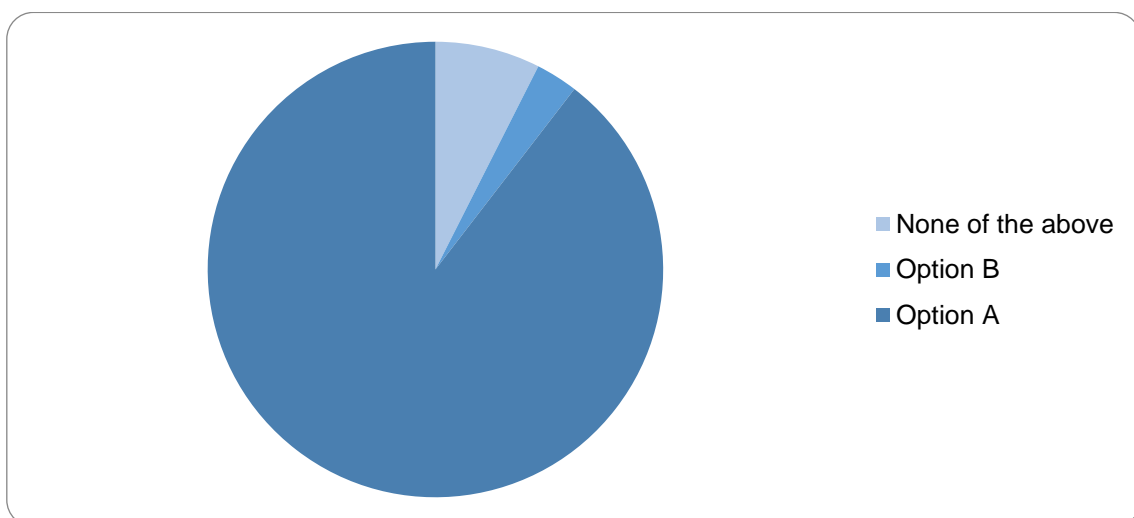
- Support that the policy leaves the door open to potential models of delivery
- The issue of how the policy works alongside Neighbourhood Development Plans (NDPs) was raised, with some considering that the policy is not needed as NDPs already empower local communities to do this.
- suggest adding 'stewardship' or 'ownership' into the policy so a management plan is developed by and with community at the outset
- Policy supports development in locations contrary to the spatial strategy and risks unnecessary encroachment into the surrounding countryside
- Policy does not go far enough with some suggesting the plan should set targets and seek a proportion of allocated sites be set aside for community led housing
- Part 1(b) is overly restrictive and should not limit the size of community-led developments.
- Needs to be supported by sufficient infrastructure, and consider cumulative impacts of these developments
- Some suggested the policy could focus on community facilities rather than housing

How the main issues have been taken into account

National policy sets a framework for considering proposals for exception sites for community-led development. It also provides a planning definition for community led developments. We have made changes to Policy HOU13 and supporting text to clarify the scale and locations for community led housing that we will support. We have also made amendments to what proposals will need demonstrate to gain support, including how proposals are to be brought forward, how schemes will be owned, managed or stewarded, and how local communities are to be involved. Finally, we have amended the policy to explain when we will support market housing on these sites.

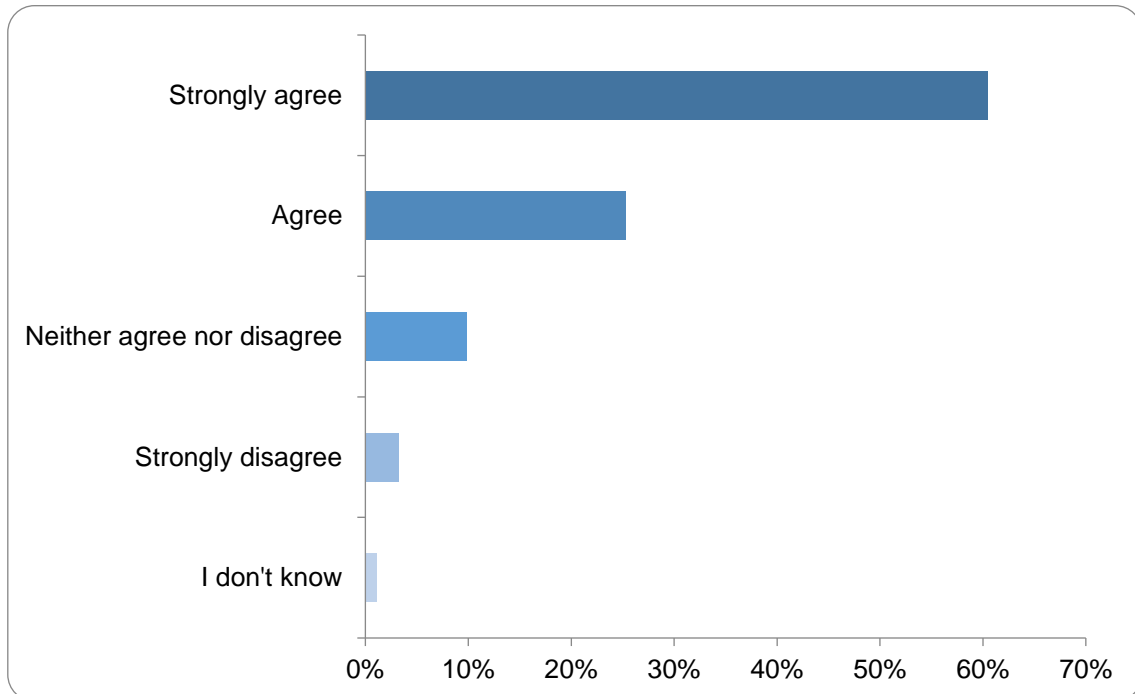
Policy HOU14 – Build to Rent proposals

Full Survey: Which option do you prefer?



Of the 67 people who responded to this question, 90% preferred Option A. 523 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 91 people who responded to this question, 85% either agreed or strongly agreed with the proposed draft policy wording. 499 people did not answer.

Full Survey: Summary of main issues raised

- There was some support for having a locally specific policy if schemes are delivered in the right place
- others considered it not necessary to have a policy on build to rent (Option B).
- Some comments argued that we need to regulate built to rent schemes, supporting Part 1(b) requiring management plans
- Those who supported the policy cited a shortage of rental properties in the districts, with a higher need for build to rent in urban areas
- Some people were concerned that these schemes would not be affordable to those in need or not provide sufficient NPPF compliant Affordable Housing
- Some concerns were raised the rental properties may be lost or used as short term lets.

How the main issues have been taken into account

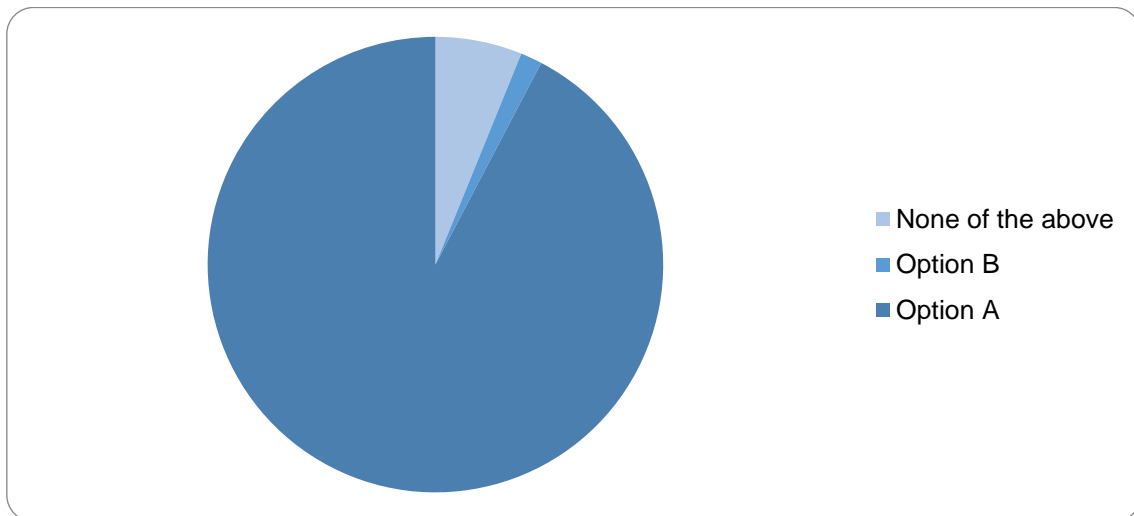
We consider it is necessary to have a policy on build to rent schemes to ensure they are directed to more suitable locations, deliver an appropriate level of affordable housing and are well managed in accordance with an agreed management plan. We cannot control the market value of build to rent properties. However, we can require that they provide affordable private rent, with rents set at a minimum of a 20% discount on market values as required by National Policy.

Policy changes include:

- We have made changes to Policy HOU14 to clarify that developers will need to set aside 20% of all homes on a build to rent development for this affordable private rent.
- We have also amended the policy to be clear how an appropriate mix of size of dwellings should be demonstrated.
- Finally, we have added more detail in the policy and supporting text on how we expect developers to manage build to rent developments.

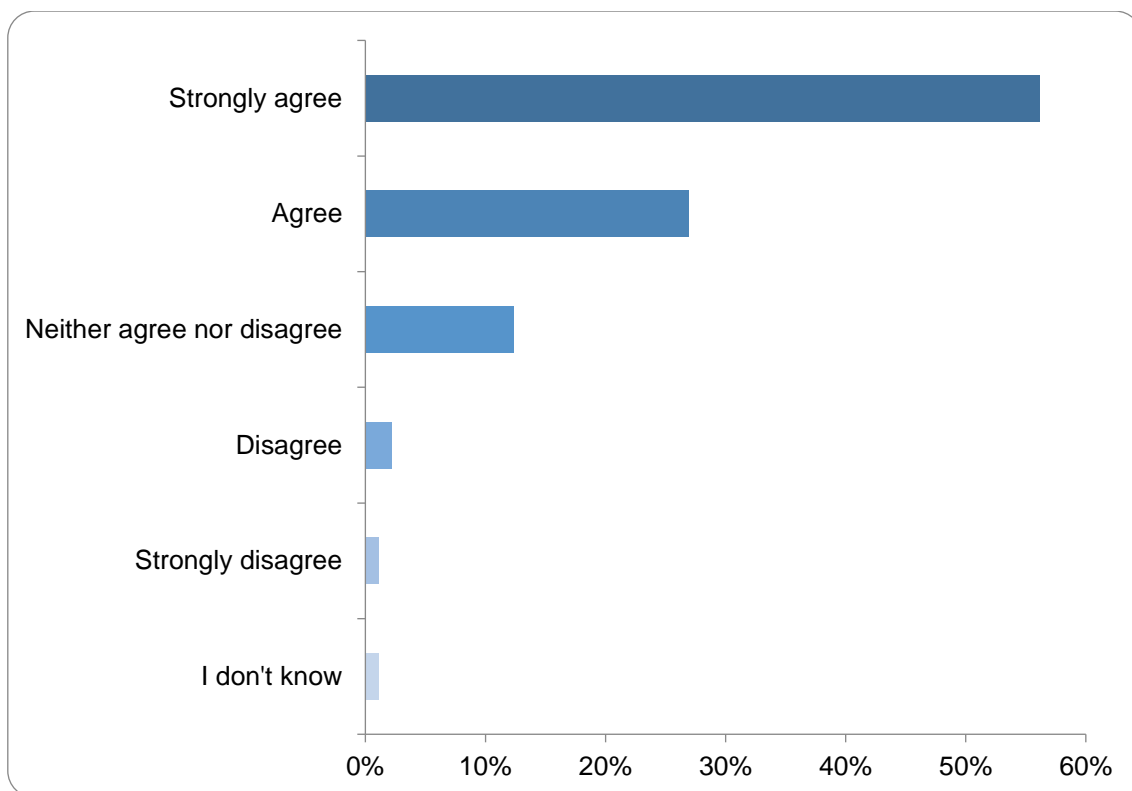
Policy HOU15 – Houses in Multiple Occupation

Full Survey: Which option do you prefer?



Of the 65 people who responded to this question, 92% preferred Option A. 525 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 89 people who responded to this question, 83% either agreed or strongly agreed with the proposed draft policy wording. 501 people did not answer.

Full Survey: Summary of main issues raised

- Respondents supported the principle of Houses in Multiple Occupation (HMOs) being controlled, commenting that too many HMOs on a street can have implications for parking.
- Other respondents suggested there is no evidence of a need for this policy, that higher concentrations can serve a purpose, and the restriction of a certain percentage on a street seems unnecessarily restrictive.
- Some respondents suggested the amount of small HMOs on a street should be considered when determining an application for large HMOs.

How the main issues have been taken into account

The councils recognise that HMOs form an important part of the overall housing stock but can result in substandard living conditions where there is an oversaturation. This policy seeks to mitigate the potential negative impacts of HMOs, while still allowing the creation of new large HMOs.

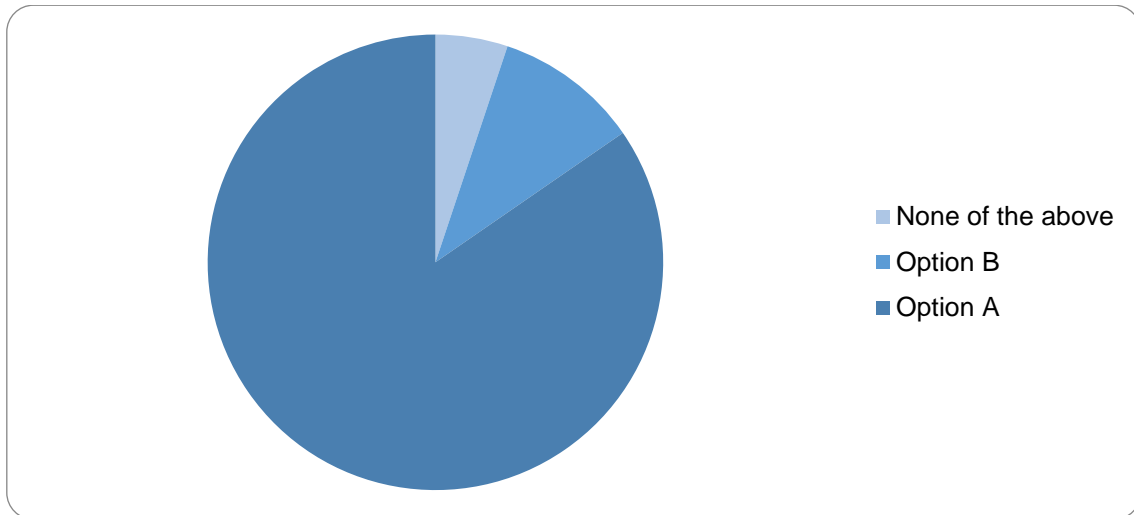
Policy changes include:

- The policy has been updated to include consideration of the amount of all registered HMOs in the vicinity, instead of just large HMOs when determining an application.

- The policy wording has also been amended to add clarity that the policy would apply to both proposals for the conversion of existing buildings and proposals for new, purpose built HMOs.

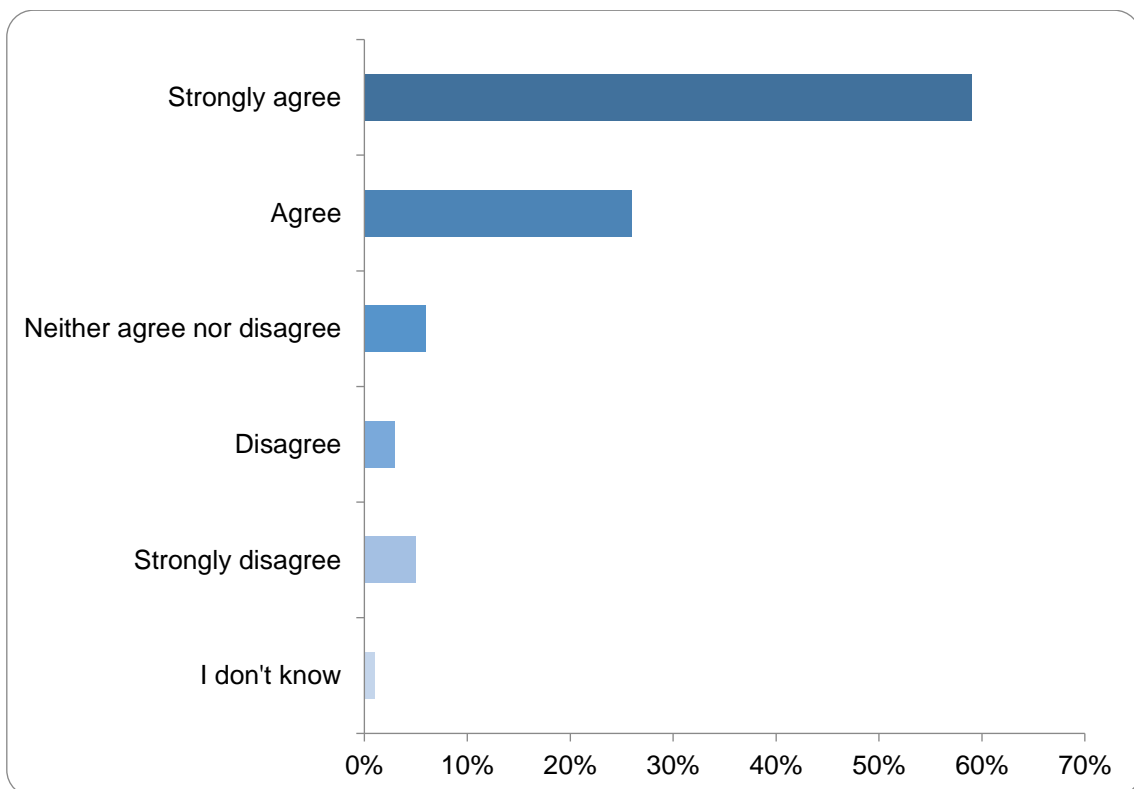
Policy HOU16 – Residential extensions and annexes

Full Survey: Which option do you prefer?



Of the 78 people who responded to this question, 85% preferred Option A. 512 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 100 people who responded to this question, 85% either agreed or strongly agreed with the proposed draft policy wording. 490 people did not answer.

Full Survey: Summary of main issues raised

- The 40 percent limit on extensions (Part 1(c)) and annexes (Part 2(d)) is unjustified, unnecessary, arbitrary, and inconsistent with national policy and should be removed.
- Other policies exist to prevent inappropriate or harmful development.
- The Joint Design Guide provides sufficient guidance on extensions and annexes.
- Some concerns were raised about flooding implications where building footprints are increased.
- Policy should include a requirement for the whole house to be retrofitted when an extension is built.
- Question if there should be reference to ancillary accommodation and annexes being required to comply with Policies CE2 and CE3.
- Suggested that the policy mentions the needs of people who work from home.

North Wessex Downs National Landscape Board support the 40% restriction being applied to the countryside as well as Green Belt.

Historic England objected to the policy as currently drafted. They considered that the policy should more explicitly refer to heritage significance and suggested alternative policy wording.

How the main issues have been taken into account

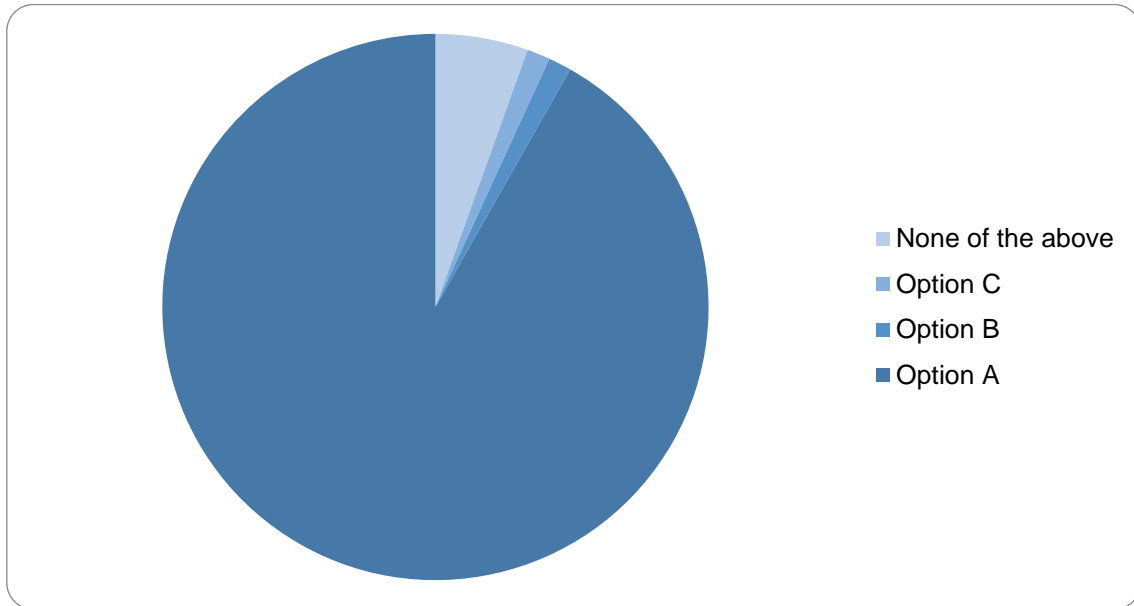
The policy provides the basis for assessing proposals for residential extensions and annexes where planning permission is required and builds on existing guidance within the councils' Joint Design Guide which proposals should have regard to. What the councils can require through this policy needs to be proportionate to the proposals, it would be unreasonable to require improvements or retrofitting to the existing dwelling, however extensions can often offer the opportunity to lower the dwellings carbon footprint. Proposals under this policy would also be considered against other relevant policies in the plan to determine their appropriateness. It is not necessary to reference every consideration within this policy for it to be given full regard.

Policy changes include:

- The policy has been amended to remove reference to limiting the size of extensions and annexes to a proportion of the original dwelling's size.
- The criterion within the policy provides a sufficient framework to consider the appropriateness of the size of extensions and annexes without an arbitrary limit.
- Reference has also been made to proposals needing to have regard to Neighbourhood Plan Character Assessments and Design Codes as well as the councils' Joint Design Guide.

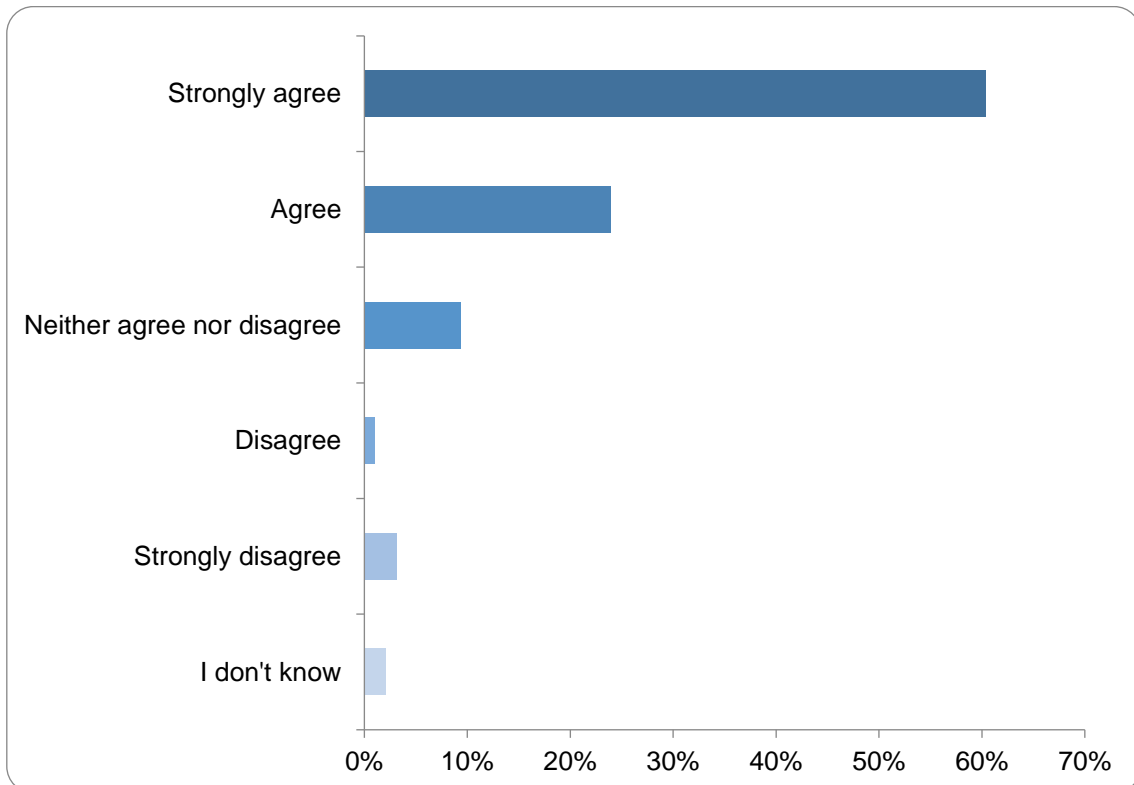
Policy HOU17 – Rural workers' dwellings

Full Survey: Which option do you prefer?



Of the 73 people who responded to this question, 92% preferred Option A. 517 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 96 people who responded to this question, 84% either agreed or strongly agreed with the proposed draft policy wording. 494 people did not answer.

Full Survey: Summary of main issues raised

- There was support for the policy where there was a need.
- Concern rural workers dwellings are being lost, with some suggesting ways to protect rural workers dwellings from being lost, including: support for removal of permitted development rights (Part 6) and proposing additional criteria to assess suitability of proposals to ensure the size and scale of the dwelling are proportional to the identified need.
- Some considered the policy should be more restrictive and not be supported in designated areas (Option B) and others suggesting a sequential test to identify alternative available accommodation.
- Concern the policy has been exploited including where rural enterprises have been split up and connected residential provision has been separated from the enterprise thus creating an artificial need for a new dwelling against the general thrust of national policy.
- Requirement for enterprise to be economic viable, may limit some non-profit organisations.
- There was some support for Option C, not having a policy.
- There should be a limit to the number of dwellings allowed. Accommodation should be retained for the use of rural workers in perpetuity.

How the main issues have been taken into account

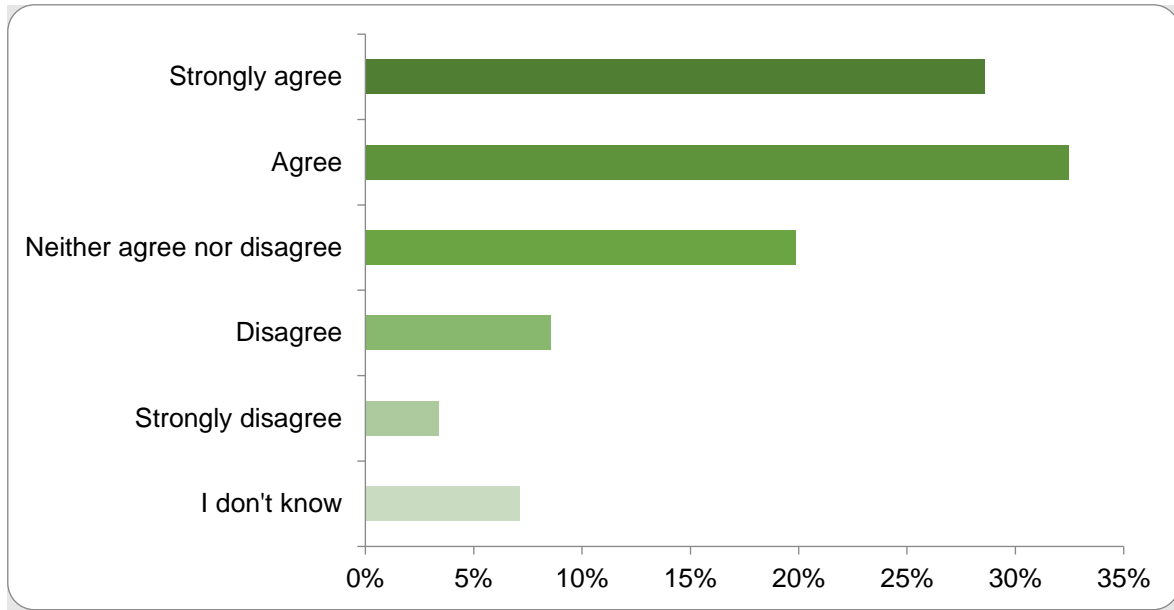
National policy and guidance supports rural workers dwellings in the open countryside including within designated areas Green Belt and National Landscapes. Guidance supports rural workers dwellings to come forward where certain criteria are met including a demonstratable need for it and that enterprise will remain viable for the foreseeable future. It would not be appropriate for this policy to take a more restrictive approach or not apply the same tests as required by national policy and guidance. The policy is required as it expands on national policy and guidance to enable full consideration of the appropriateness of proposals.

Policy changes include:

- The policy has been amended to consider the size and scale of the proposed dwelling and how it relates to the identified need for a rural workers' dwelling.
- Reference in policy has been made to land nearby under the control of the business rather than just on the site of the business are considered.
- Supporting text has been added setting out how the applicant is expected to demonstrate the need for the dwellings through the consideration of suitable available existing accommodation in the vicinity of the rural business.
- These changes will ensure the dwelling is proportionate to the need and avoid unnecessary or overly large buildings in the countryside, this is to address concerns that policy could be exploited.

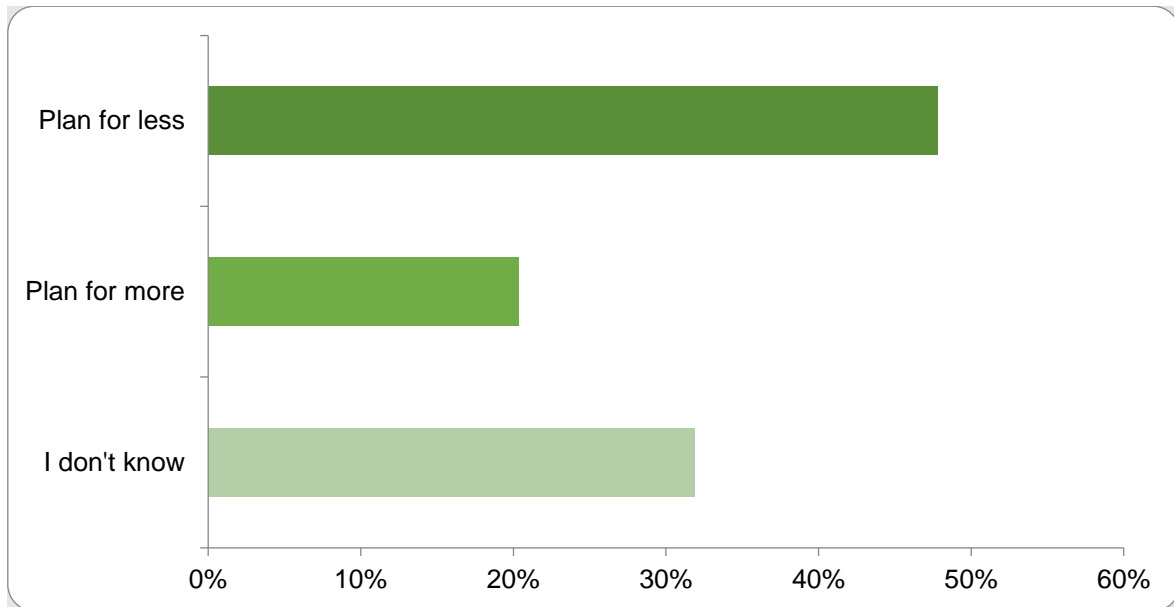
Jobs and tourism

Nutshell (Section 5): How far do you agree or disagree with our approach to employment land?



Of the 619 people who responded to this question, 61% of people either agreed or strongly agreed with our proposed approach to employment land. 63 people did not answer.

Nutshell (Section 5): If you selected disagree or strongly disagree, what would you propose?



Of the 113 people who responded to this question, 48% of people proposed that we should plan for less employment land. 569 people did not answer.

Nutshell (Section 5): Other comments on jobs

141 people answered this question.

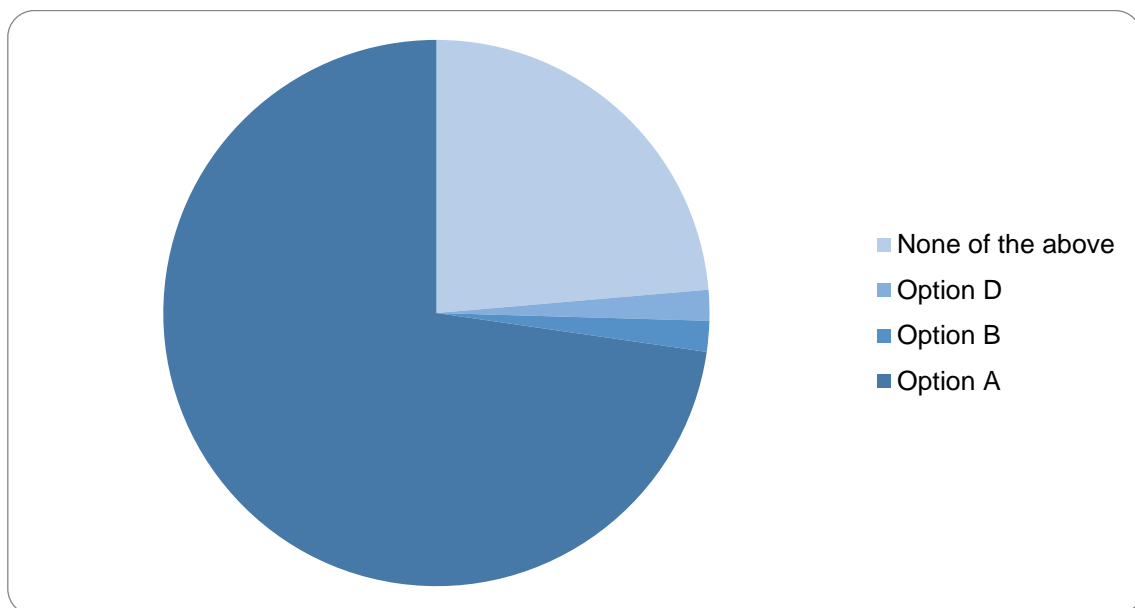
As is indicated above, responses to this question highlighted that some people think more employment land is needed, whilst others think it is not. A more flexible approach to need for employment land was suggested, alongside the utilisation of under-utilised employment buildings. Respondents particularly commented on the location of employment land, suggesting it should be appropriate to the area it is located, with comments suggested this should be near to residential areas, on brownfield sites and in a location that protects the countryside – although some respondents supported rural diversification. Concerns were raised regarding the impact of traffic associated with employment uses, so any employment land provided should be near improved public transport links and in alignment with a transport strategy.

Respondents suggested a preference for mixed-use developments that combined employment, retail and housing. In some cases, this referred to allocated and / or strategic employment sites in the district, such as Culham and Harwell. There was considered an opportunity to provide more skilled job opportunities that could potentially align with levelling up aspirations.

A few respondents highlighted the design of employment space, including a preference for co-working spaces, which should be promoted especially in towns and villages. Others raised the need to avoid or limit high rise units and consider the fact that employment use is being changed to housing. A number of respondents suggested that appropriate infrastructure is required to support employment and should be delivered upfront.

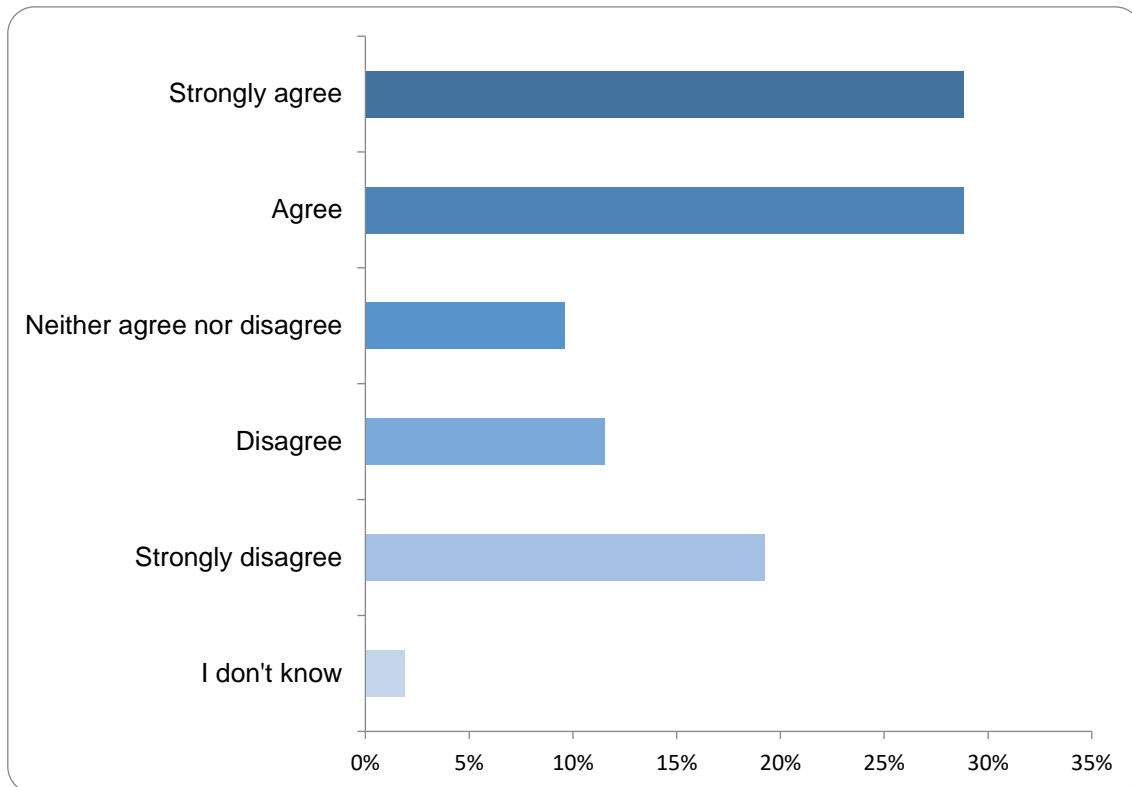
Policy JT1 – Meeting employment needs

Full Survey: Which option do you prefer?



Of the 55 people who responded to this question, 73% preferred Option A. 535 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 52 people who responded to this question, 58% of people either agreed or strongly agreed with the proposed draft policy wording. 538 people did not answer.

Full Survey: Summary of main issues raised

- The majority of respondents for Policy JT1 (Meeting employment needs) either supported or strongly supported the preferred option (Option A).
- Of those who provided comments, the majority advocated planning for higher levels of employment growth and making more employment allocations. There was a range of reasons, including:
 - The employment needs evidence underestimates future growth, with too much reliance on current working from home trends continuing, by not recognising the potential of knowledge industries (and spin outs), and by not directly reflecting the Oxfordshire Strategic Economic Plan.
 - Employment allocations should be increased to help meet the productivity challenges in the economy and provide flexibility to react to emerging needs not anticipated in the plan (as encouraged by Paragraph 86(d) of the NPPF)
 - The policy should treat employment need figures as 'a minimum' to facilitate growth beyond that set out in the Plan and safeguard/allocate land close to existing strongly performing economic assets (such as Harwell Campus).
- Some respondents proposed areas that would be suitable for development or had employment need, including Abingdon-on-Thames, Chinnor and

Faringdon. We have shown the full list of sites that site promoters submitted to us on the Housing and Employment Land Availability Assessment.

- Some respondents were critical of the strategy and supporting evidence, stating that the plan needs to:
 - Issue a new 'call for sites' to ensure the site allocation process and employment land supply is robust, and this will provide alternative allocations if some of the allocated sites are not brought forward.
 - recognise that the closure of OxLEP as an independent economic development organisation makes the support environment more challenging.
 - facilitate new employment development, particularly in rural areas.
 - Remove the Southmead Industrial Estate allocation, where at least one site has remained dormant for many years.
 - Reduce reliance on brownfield, windfall development in lower tier settlements, as it is unclear where these sites will come from.

The Ministry of Defence highlighted that certain sites lie within the RAF Benson height and bird strike safeguarding zones. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones, and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxfordshire County Council suggested a specific policy on the Didcot Technology Park (D-TECH) Local Development Order (LDO) and noted that the Plan proposes to replace CP28 (New Employment Development on Unallocated Sites) from Vale Local Plan Part 1 with policy JT1. They said that given the D-TECH LDO site is within the Didcot Growth Accelerator Enterprise Zone, clarity on the policy position should be included in Policy JT1.

Oxford City Council stated that it is not clear that the number of homes proposed is sufficient to support the level of employment envisaged. Economic growth potential won't be met without residents to support it.

How the main issues have been taken into account

The Employment Land Needs Assessment (ELNA) has evidenced that our employment requirements can be met through our existing allocations and there is no evidence to justify allocations of new employment sites. The Joint Housing Needs Assessment (JHNA) also confirms that there is a sufficient supply of homes to meet the job growth in the districts. The policy is flexible in allowing supply to come through allocated sites at a range of sizes, at locations in Science Vale and across the districts. Furthermore, the supply of employment land exceeds our need. This enables the districts to meet their current and future needs, and for existing sites to redevelop and adapt for churn in the market. The policy is also sufficiently flexible to allow many of the site promotions received to come forward.

We have updated the policy to make sure all sources of employment supply that previously were not mentioned are now listed, including all carried forward sites, the

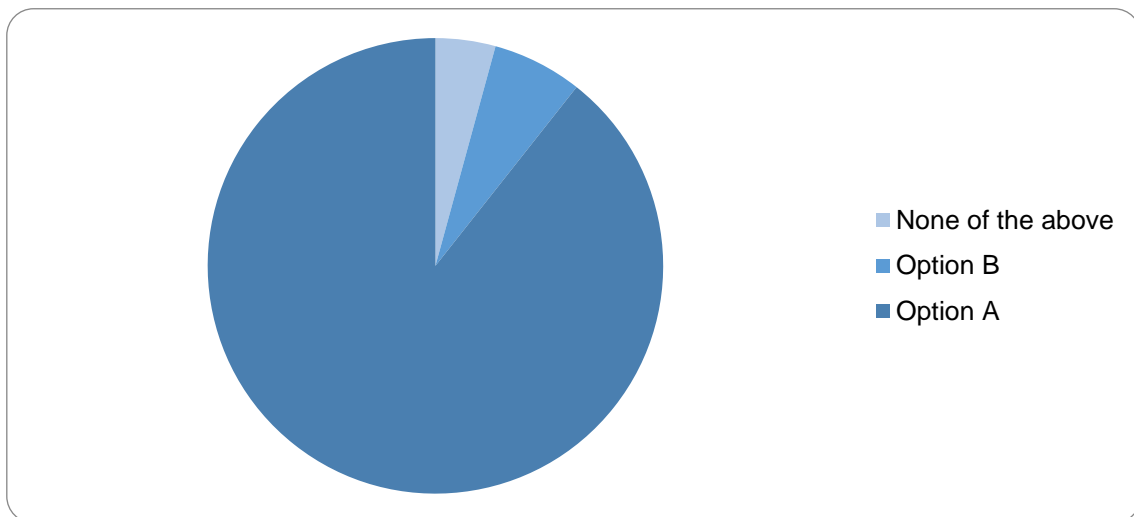
two sites with Local Development Orders (Didcot Technology Park and Milton Park) and the two sites within Enterprise Zones that have remaining employment land to be developed (Didcot Quarter and the land next to Milton Interchange).

Policy changes include:

- We have included all carried forward sites as sources of employment land supply
- We have recognised Didcot Technology Park and Milton Park as sites with employment land to be delivered as part of Local Development Orders
- We have recognised the land next to Milton Interchange and Didcot Quarter as Enterprise Zones with remaining employment land to be developed
- We have updated tables for clarity, by including hectares in the row titles rather than the column titles
- We have amended the policies map to include updated site references.

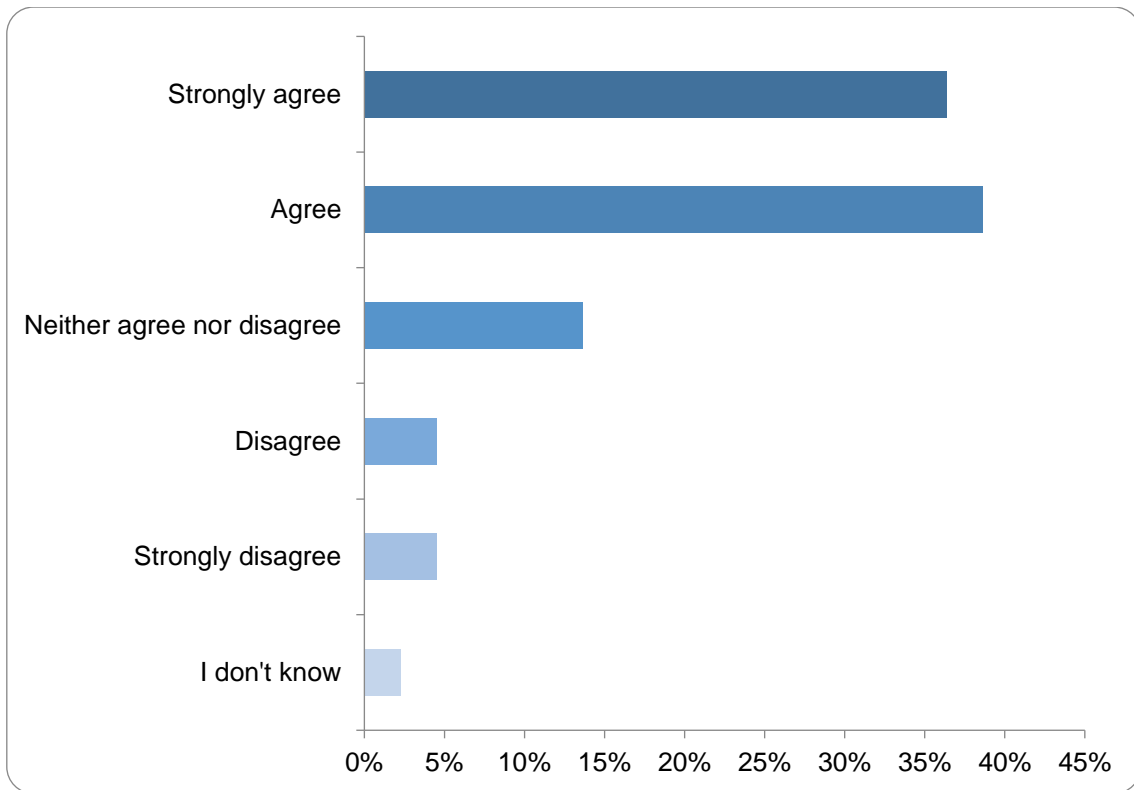
Policy JT2 – Protecting our employment sites

Full Survey: Which option do you prefer?



Of the 47 people who responded to this question, 89% preferred Option A. 543 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 44 people who responded to this question, 75% of people either agreed or strongly agreed with the proposed draft policy wording. 546 people did not answer.

Full Survey: Summary of main issues raised

- There was overall support for retaining employment land and safeguarding the most valuable existing employment sites in the districts.
- One respondent stated that the policy needs to be robustly enforced to prevent loss of employment land (such as in Faringdon); and another emphasised the importance of protecting employment sites designated in Neighbourhood Plans.
- One comment requested that the councils consider the costs for redeveloping sites for alternative employment generating purposes, and the impact on viability. Similarly, another requested that the plan define 'viable' in the supporting text. Another respondent contended that if a site is no longer viable it is counterintuitive to also require marketing of the site.
- Regarding marketing, one respondent called for the policy to go further, suggesting there should be a longer time limit to demonstrate no market interest and that the marketing criteria need strengthening. Conversely, another respondent suggested marketing should be reduced and be proportionate outside the strategic employment designations.
- There was a call for greater emphasis on re-using existing space, by prioritising employment space that is no longer fit for purpose before any new sites are developed. However, another respondent indicated that the current circumstances allowing redevelopment are too narrow, which results in sustainable sites with previously developed land being unable to be re-

developed. They recommended that the policy allows for redevelopment when the retention of a specific site is no longer necessary.

- One respondent stated that the policy should only apply to sites that employ people, some 'employment' uses do not actually employ many people.

Oxfordshire County Council advised that this policy as written would preclude any of the sites being used for a waste management facility which would be a sui generis use. This would conflict with policy W5 of the Oxfordshire Minerals and Waste Local Plan which gives priority to waste sites on land which is already in an industrial use.

How the main issues have been taken into account

The change of use to non-employment uses has stringent criteria, this is necessary to safeguard our employment sites. The E Class use (which our employment sites fall within) is a flexible and wide-ranging definition, so sustainable sites can be redeveloped with a new employment use. There is, therefore, sufficient flexibility across national and local plan policy to allow businesses to expand and adapt, whilst simultaneously protecting our employment sites.

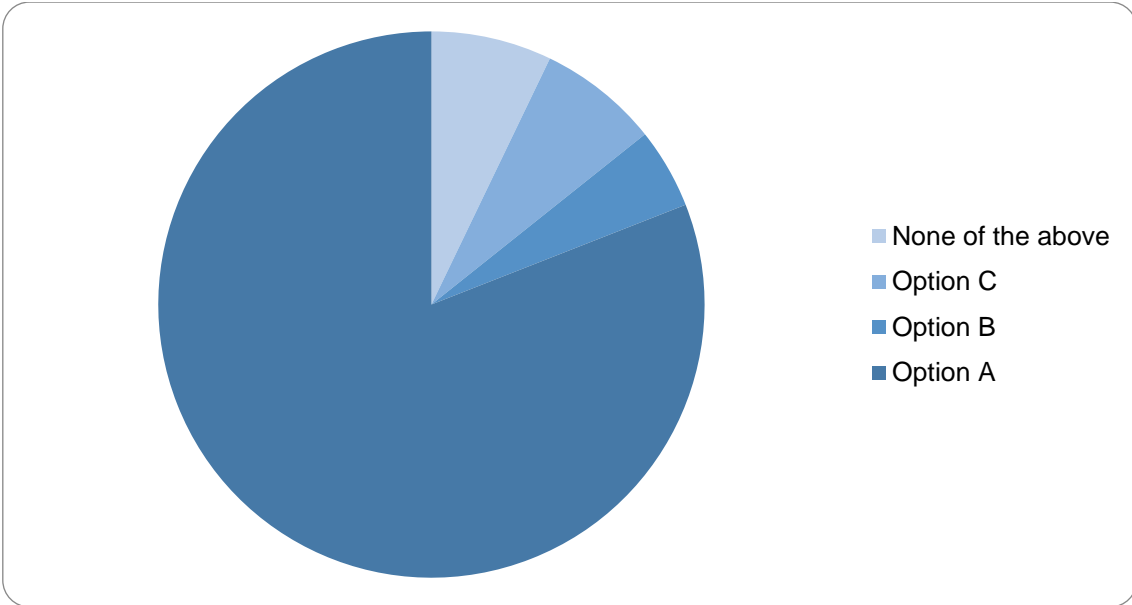
We have added clear and robust viability and marketing criteria as an advisory note in Appendix 6 to the proposed submission plan. We are confident these requirements will afford sufficient protection for our employment sites. It is not appropriate to provide a standardised definition of 'viable' within the Joint Local Plan, as any development proposal needs to be assessed on its own merit. Furthermore, there is extensive national planning guidance on viability. Nonetheless, we have expanded the supporting text to include a list of information and guidance for applicants to include in their viability assessment. This includes recognising the costs for redevelopment of existing buildings/employment land.

This policy will apply to all employment sites, even low-job density sites, as all contribute to the local economy. It is important to support a diversity of employment sites to ensure a resilient and sustainable local economy.

We do not consider there to be reasons to change the policy text from the draft proposed in the Preferred Options Consultation. We have, however, added guidance for marketing and viability assessments to the supporting text and an advice note in Appendix 6 of the Pre-submission Publication (Regulation 19) version of the Joint Local Plan.

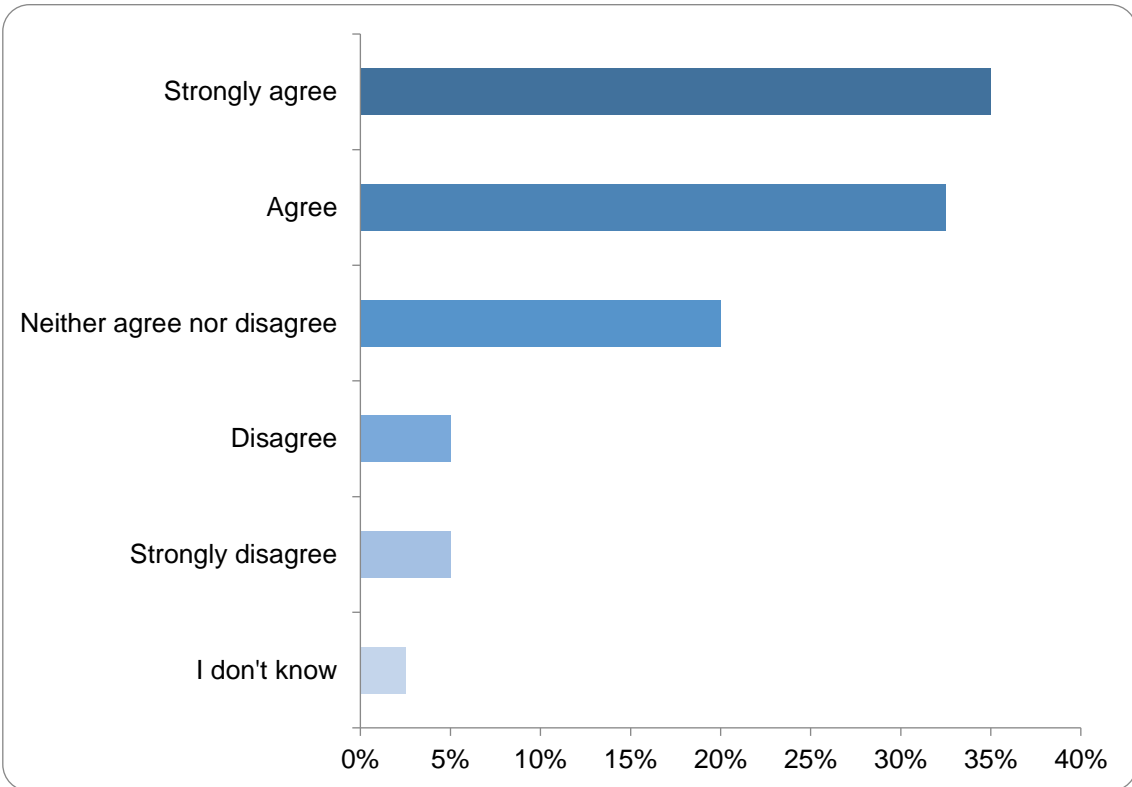
Policy JT3 – Affordable workspace

Full Survey: Which option do you prefer?



Of the 42 people who responded to this question, 81% preferred Option A. 548 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 40 people who responded to this question, 68% of people either agreed or strongly agreed with the proposed draft policy wording. 550 people did not answer.

Full Survey: Summary of main issues raised

- There was support for affordable workspace provision to support viable settlements and support for commercial use to incorporate an element of affordable workspace
- A number of respondents say the policy could go further in identifying certain locations for affordable and startup businesses and employment
- A number of respondents suggest the policy could consider 'enabling' type development where mixed use schemes with some housing could help to fund affordable workplaces and at the same time provide for the co-location of new homes and jobs in a sustainable manner
- Some commented that the policy should also apply to residential development
- It was suggested provision of affordable workspace on new employment sites must be subject to viability and not impede deliverability of employment sites
- There was a concern raised over how effective the policy would be. In order to make space affordable landowners will need to offset costs by enabling other development
- Some respondents suggested the policy should allow this type of development to come forward outside tiered settlements, as these types of developments do not employ large numbers
- Some comments suggested affordable workspaces be mandatory both in town centres and in existing out of town locations.

How the main issues have been taken into account

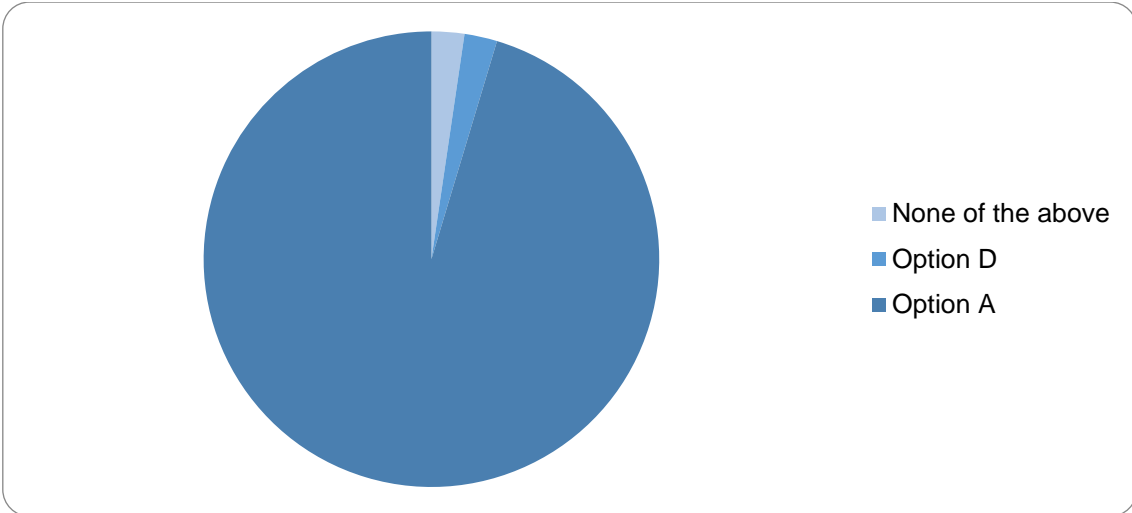
We now have further evidence to justify the need for affordable workspaces and this will help refine Policy JT3, and to respond to issues raised during consultation. We agree that affordable workspace can be a viable and deliverable outcome for mixed use proposals as well as employment only proposals, however affordable workspaces wouldn't be suitable within residential only schemes as they may prevent delivery.

Policy changes include:

- We have updated the policy to reflect AECOM's Employment Study Stage 2 recommendations, and to reference a further affordable workspace strategy. This subsequent strategy will be able to suggest viable discounts and other details relating to the delivery of the policy.
- We have amended the policy to refer to the types of development that the policy applies, to include employment and mixed-use schemes over a certain threshold.

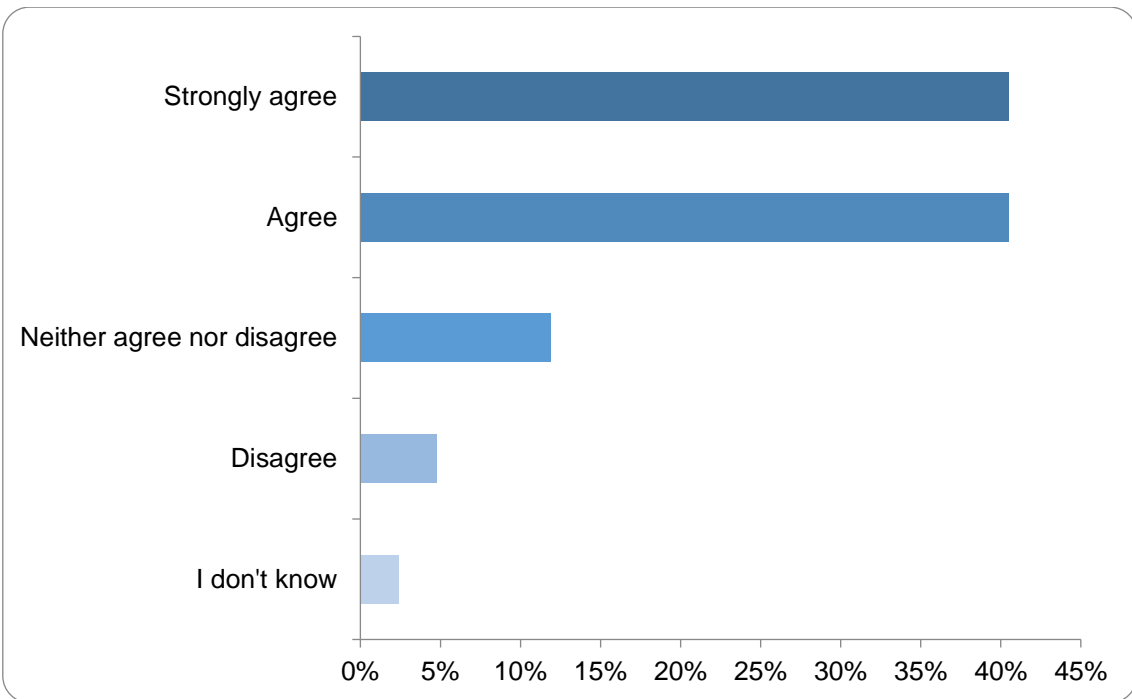
Policy JT4 – Community Employment Plans

Full Survey: Which option do you prefer?



Of the 43 people who responded to this question, 95% preferred Option A. 547 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 42 people who responded to this question, 80% of people either agreed or strongly agreed with the proposed draft policy wording. 548 people did not answer.

Full Survey: Summary of main issues raised

- There was support for providing employment opportunities for disadvantaged groups.
- There was support for requiring Community Employment Plans (CEPs) and comments supporting that the Vale current threshold is deliverable.

- There was support for the site-specific CEP approach, stating the most appropriate way to secure CEPs would be via planning conditions.
- Some respondents thought that the scheme should apply to smaller developments (have a lower threshold).
- Some raised that there would need to be some flexibility in the interpretation of ‘local supply chain’, depending on how this is measured.

Historic England proposed that the policy or supporting text could also refer to the heritage skills sector. This could fall within the scope of “social and environmental initiatives”.

Oxfordshire Local Enterprise Partnership suggested amending the wording of criteria d) to make it more inclusive.

How the main issues have been taken into account

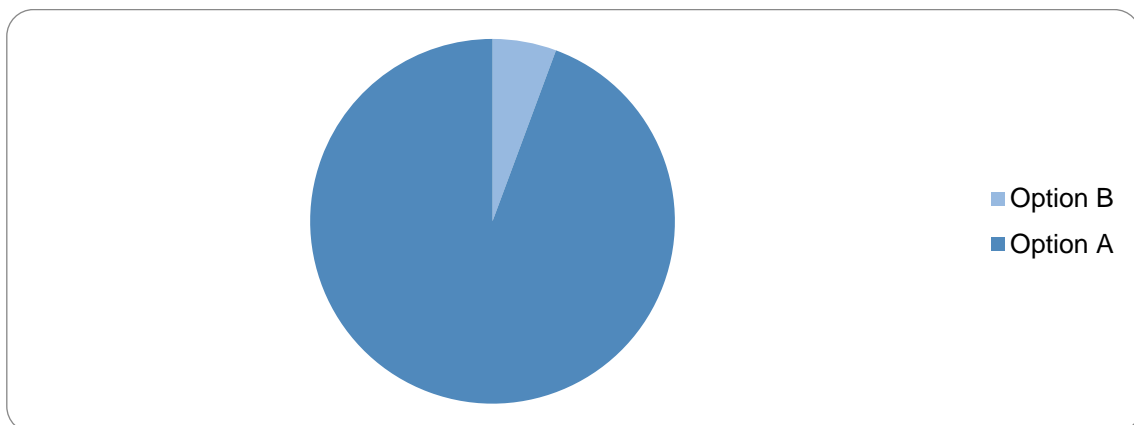
It wouldn’t be appropriate to lower the threshold for requiring CEPs as this would make it onerous on smaller developers. We will continue to use policy definitions in line with the OxLEP Developers Handbook for Community Employment Plans, which was widely supported during the Preferred Options Consultation. In previous plans, the threshold for requiring CEP was for defined ‘major development’, so we know these are achievable. We have decided to make reference to the heritage skills sector in the supporting text, because the policy isn’t specific about any particular sectors linked to CEPs.

Policy changes include:

- We have amended the policy in line with suggested wording from OxLEP, and the policy now includes ‘inclusive economic’ initiatives.
- We have included Supporting text to Policy JT4 to include the heritage skills sector as another important link to CEPs, and reference to the OxLEP template activities.

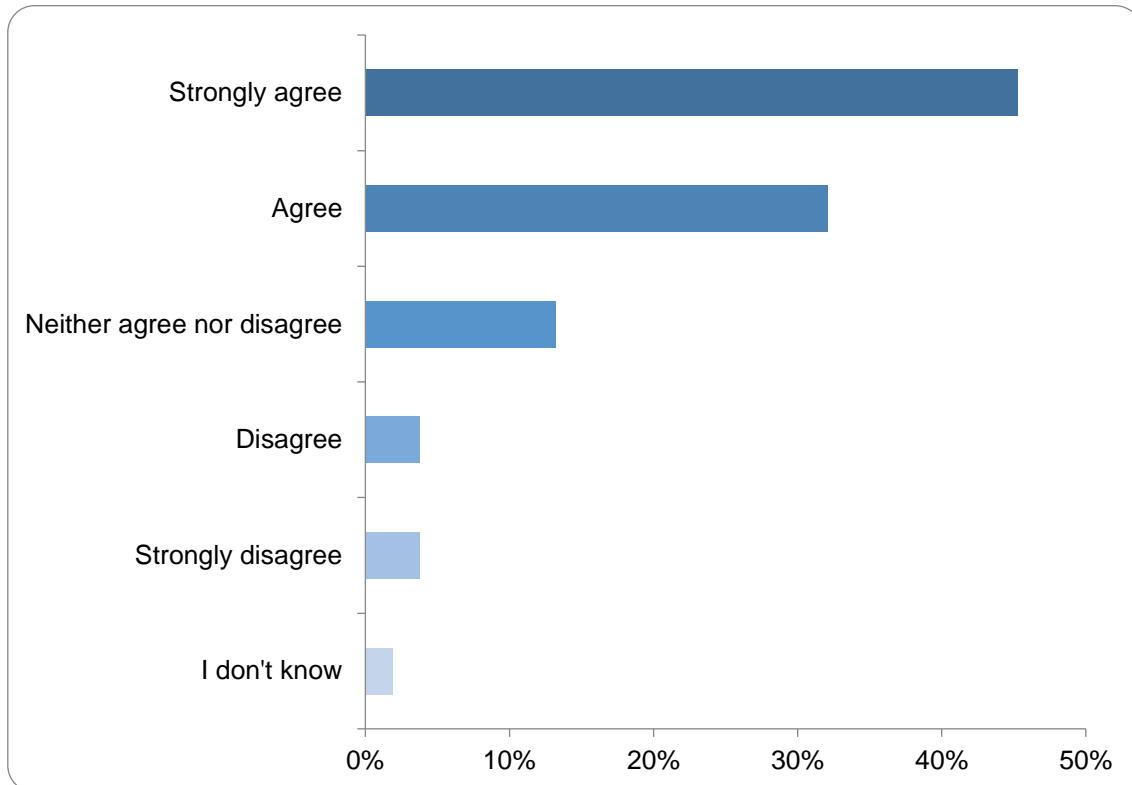
Policy JT5 – Supporting the rural economy

Full Survey: Which option do you prefer?



Of the 53 people who responded to this question, 94% preferred Option A. 537 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 53 people who responded to this question, 77% of people either agreed or strongly agreed with the proposed draft policy wording. 537 people did not answer.

Full Survey: Summary of main issues raised

- Some respondents supported Option B which would see the plan rely on the NPPF to guide appropriate rural development
- A number of respondents suggested there is little proactive or positive text about how and where rural enterprise might flourish. They suggest there could be more about enabling rural enterprise through mixed use development, or that the council could strengthen the policy by making site allocations
- Some suggested that the policy is too restrictive, that all types of businesses should be supported in rural areas, arguing this is in line with NPPF. They argue that the policy would limit both the location and type of employment development that would be acceptable in rural areas, where they are outside existing settlements
- Some respondents suggested Part 2 would restrict infrastructure development outside the settlement hierarchy, such as renewable generation, flood defence, transport or water resource infrastructure. They argue that this would conflict with other policies and national policy, and that the councils should amend the policy to clarify that development covered by other policies is supported, not just limited to JT6 and JT7

- One comment suggested that the policy should also include protection for Public Right of Ways
- Some comments suggested that the policy should allow affordable workspace in rural areas, while others also argued that the policy should go further in promoting leisure and tourism in rural areas. Such comments emphasised that visitors who come to enjoy the countryside also contribute to the local economy
- One comment suggested that the policy recognises and controls the harmful lighting associated with equestrian uses
- Comments suggested that adapted buildings be accessible for all users, including older people
- Comments asked that the policy controls farm diversification to agricultural uses only. They argued that this will prevent short term diversification, followed by changing the use of the new buildings to non-agricultural uses
- It was suggested blanket acceptance of equestrian activities might give license to construct buildings on that pretext and then claim uses for redundant buildings
- There is recommended wording changes to protect against unacceptable impact on PRow in Parts 1(d) and 4(b), and include equestrians as a sustainable transport mode in Part 1(e).

Historic England suggested that to be fully clear the policy could refer to heritage significance under Part 1(a).

Oxfordshire County Council noted that the introductory text recognises the importance of having sustainable food producers to help address the challenge of climate change and to create sustainable food chains, but this is not recognised in the proposed policy wording. They recommended its inclusion in the final policy.

How the main issues have been taken into account

Our evidence does not justify the plan making new allocations specifically for rural employment. There are 20 rural employment locations classified across South Oxfordshire and the Vale of White Horse, and our employment study identified good farm diversification activity across the districts. This explains why the JLP sought a positive policy in line with the NPPF to support flexibility in the rural economy to respond to opportunities to re-use or adapt land and buildings no longer in productive agricultural use.

We acknowledge that Part 4 of the draft policy did not make it clear that equine related activities would be supported, but also needed to satisfy part 1 of the policy.

We agree that Part 2 of the policy should also refer to infrastructure schemes where it has planning permission.

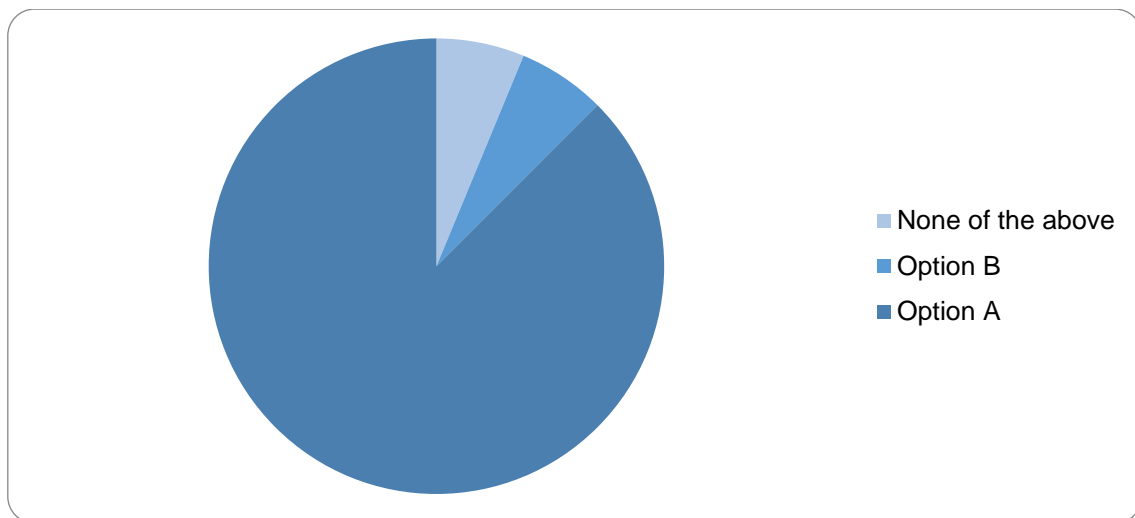
The supporting text can clarify that existing business in the rural area includes food production as an agricultural or land-based activity, but references to a select few or a whole host of specific business sectors isn't proportionate given the policy states land-based or agricultural business are included.

Policy changes include:

- We have amended the policy to include suggested wording around lightning, public rights of way and equestrian uses, including strengthening the requirements for equine uses converting to other uses in the rural area.
- We have amended part 2 of the policy to reference justified infrastructure schemes as another exception.
- We have amended the policy to ensure development proposals limit their impact on public rights of way.
- We have added supporting text to clarify that existing business support into the rural area includes food production.

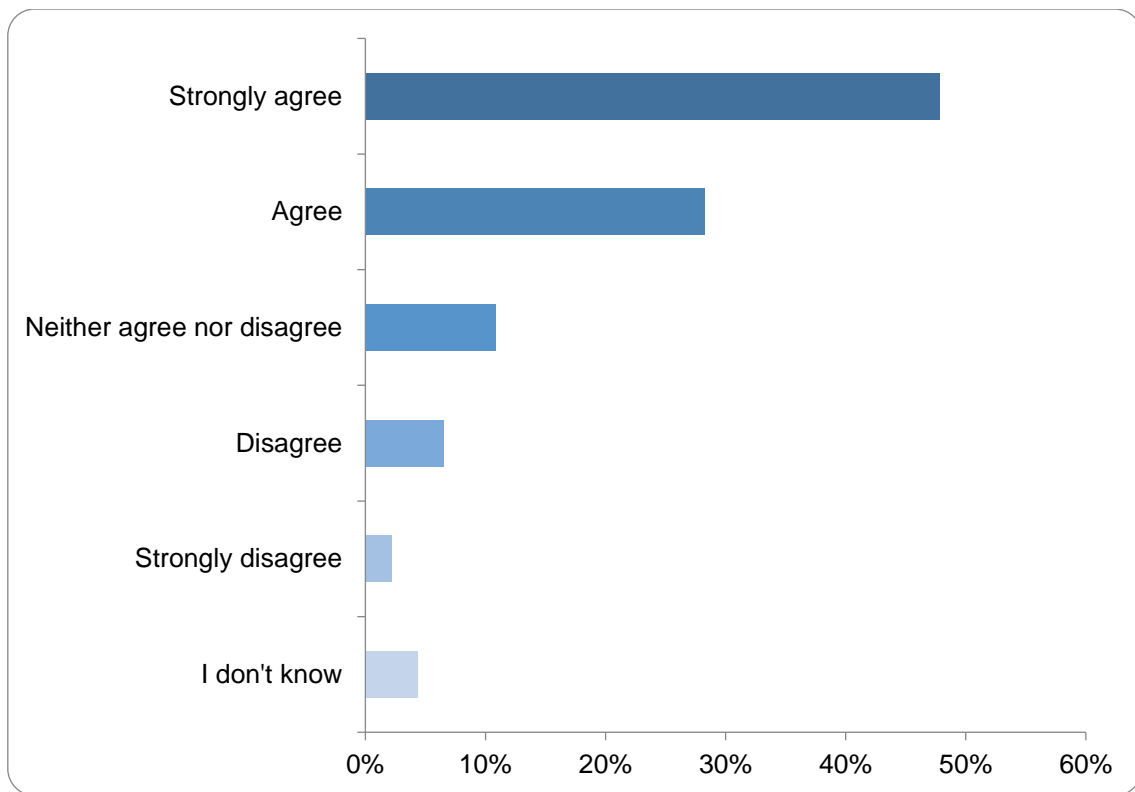
Policy JT6 – Supporting sustainable tourism and the visitor economy

Full Survey: Which option do you prefer?



Of the 48 people who responded to this question, 88% preferred Option A. 542 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 46 people who responded to this question, 76% of people either agreed or strongly agreed with the proposed draft policy wording. 544 people did not answer.

Full Survey: Summary of main issues raised

- Overall support for Option A, which will ensure that new tourism development maximises benefits to the local economy and supports several of the JLP's objectives, whilst minimising harmful environmental or local amenity impacts.
- One landowner felt that the JLP presented a good opportunity for the councils to identify sites which could deliver a significant boost to the local tourism industry which had struggled in recent years.
- Support for improved access to national hiking trails and specific mention of ensuring facilities meet the needs of disabled people.
- Part 5 could be improved by referring to the 'Public Rights of Way network', rather than to permissive routes which are not permanent. Access to 'nature' would also be better described as 'green spaces and the countryside'.
- Part 2 appears to allow all scales of development, whereas current policy (in South Oxfordshire Local Plan 2035) only allows 'small-scale' tourism development in open countryside.
- Policy could be improved by using some wording from EMP11 of SOLP 2035 (e.g. including references to 'small-scale' development, respecting 'dark skies' and controlling the use of land for equestrian purposes).
- Policy needs to set a higher bar for assessing proposals against impacts on landscape, ecosystems and local road network. Environmental impacts are more than just light, noise, air pollution and traffic congestion. This list should not be a closed one.

- Need to expand the supply of shops and food & drink establishments etc. to satisfy tourist demand and enhance the visitor experience.
- Policy needs to be more proactive and specify locations where only eco-tourism will be allowed.
- Tourism can have negative impacts (e.g. on parking, traffic, noise, light pollution, sewerage).

Wilts and Berks Canal Trust commented that the bullet point in Option A supporting canal restoration should be reflected in JT6, which currently does not mention canal restoration with its associated paths and cycleways. This is an important recognition of the benefits of canal restoration to the community which will accrue through opportunities to develop the visitor economy. The restored Wilts & Berks Canal will create new routes linked to adjacent waterways and open up the beautiful countryside to walkers, cyclists and boaters, as well as points of interest for other visitors.

Historic England welcomed this policy.

How the main issues have been taken into account

Part 5 does already support restoration of the local canal network. However, we have added reference to ‘associated towpaths’ and reference to supporting development proposals that improve public access to green spaces and the countryside via public footpaths, bridleways, restricted byways and other walking/ cycling routes (including the National Trails, National Cycle Routes and the Strategic Active Travel Network).

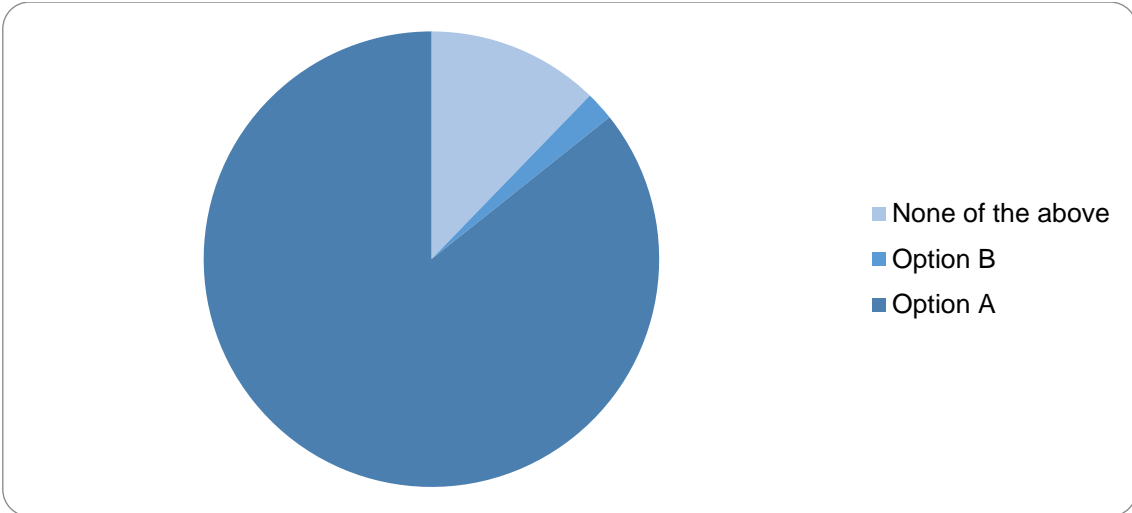
We agree that Part 2 should only apply to ‘small scale’ tourism development (including farm diversification and equine development) in locations outside existing settlements, and that such development will only be supported where it does not have an adverse impact on the landscape character, visual quality, biodiversity, dark skies and tranquillity of the countryside, particularly within the National Landscapes. We have also amended Part 2(b) to clarify that potential environmental impacts might include others not listed.

Chapter 9 policies support a wider mix of town centre uses, which will help to encourage footfall and improve the visitor experience in our towns.

This policy only supports rural diversification through the promotion of eco-tourism subject to compliance with Parts 2(a) to (d). We cannot foresee where diversification proposals will come forward, but the policy gives sufficient protection from any adverse impacts.

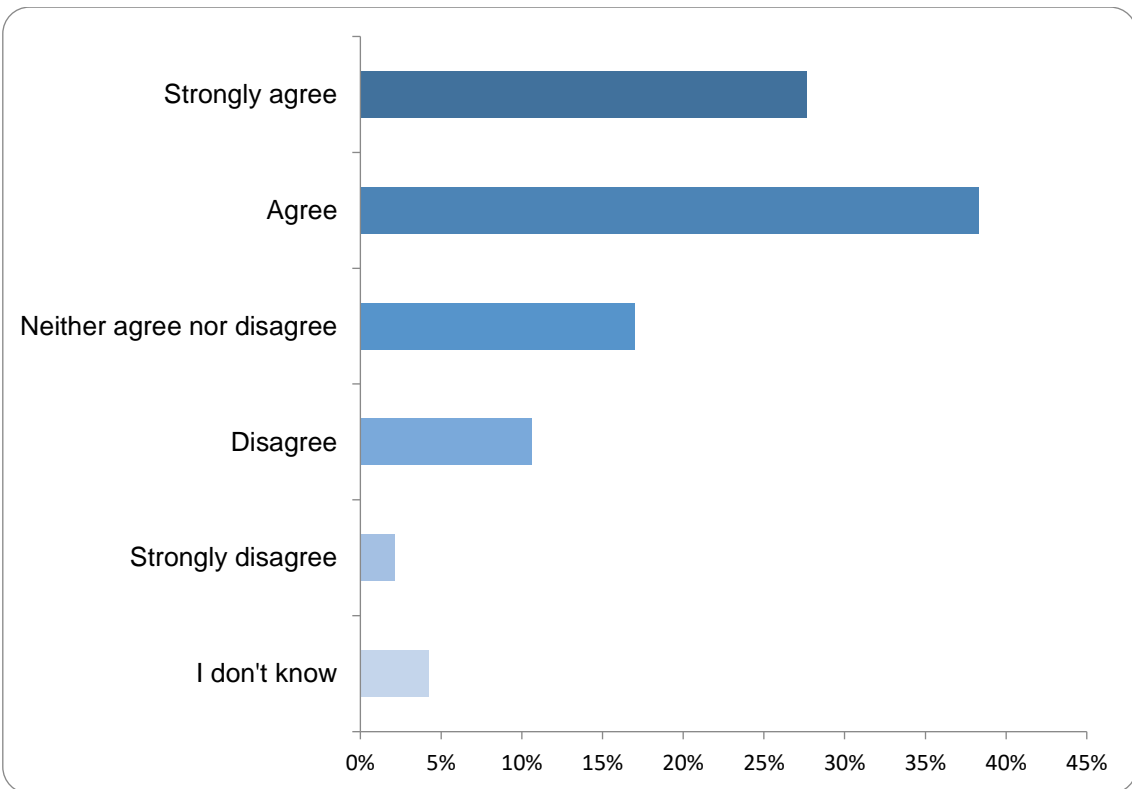
Policy JT7 – Overnight visitor accommodation

Full Survey: Which option do you prefer?



Of the 49 people who responded to this question, 86% preferred Option A. 541 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 47 people who responded to this question, 66% of people either agreed or strongly agreed with the proposed draft policy wording. 543 people did not answer.

Full Survey: Summary of main issues raised

- The provision of overnight accommodation is a key component of sustainable tourism and the visitor economy, which can support the JLP’s objectives of

promoting healthy and more active lifestyles, planning for new jobs and a flourishing economy, and creating great places.

- One parish council considered that the aim of achieving sustainable tourism in rural areas was a difficult one and that it was better to wait for publication of the evidence base before selecting a preferred option/drafting policy wording.
- Another noted that, although this policy was strongly supported, they had specific concerns over the provision of shepherds' huts, which could have an adverse impact on the landscape.
- Development must not have an adverse impact on (i.e. stronger than just 'respect') the landscape and countryside and the policy should include reference to avoiding harm to National Landscapes and other protected sites such as SSSIs.
- Several respondents expressed concern that not enough was being done to limit dwellings being used as short term lets (or AirBnBs), which could have an adverse impact on the local housing supply and reduce the amount of affordable housing available.
- Definition of 'small scale' is vague. It refers only to the type of development (caravans, tents, eco-lodges and shepherds' huts etc) rather than their scale. What will not be supported should be made clearer.
- Policy needs to say more about planning for new hotels/guesthouses. Part 1 allows for new hotels within existing settlements yet fails to acknowledge that there may not be sufficient (or appropriate) land to satisfy this demand. Why, when Policy JT7 Part 3 allows for overnight accommodation in the countryside, does this not include hotel accommodation too, even if limited in size restrictions or only on previously developed land, when there is proven demand?
- One site promoter said that the wording of Part 4 potentially conflicted with Part 3, as it suggested new facilities would only be appropriate where they are alongside existing facilities. They also felt that the policy needed to distinguish between general countryside and the Green Belt.
- Policy shouldn't block accommodation for walkers and cyclists on the Ridgeway or other leisure routes that are not well served by public transport links or facilities close by. Accommodation for these will enhance sustainable access to such routes.
- Support for new moorings within settlements but there may be circumstances when removal of a limited number of moorings enables better access to the River Thames for the wider public.

Wilts & Berks Canal Trust commented that outside existing settlements, temporary moorings may also be needed for operational reasons, near locks, moving bridges etc.

Historic England welcomed this policy.

How the main issues have been taken into account

Our Hotels and Visitor Accommodation Study is now complete, and we have reflected on its key recommendations when making amendments to Policy JT7.

Development proposals must comply with all other JLP policies, and we already have policies covering protection of designated sites. We have, however, amended Part 3(a) to confirm that we will only support proposals which do not have an adverse impact on the landscape character, visual quality and tranquillity of the surrounding countryside, particularly within the National Landscapes.

We note the concerns raised over the potential impact that a proliferation of AirBnBs could have in South Oxfordshire and Vale of White Horse, particularly in relation to reduced housing stock and the affordability of housing locally. Our research findings suggest that, whilst this may be an issue for popular holiday destinations where tourism is the overriding economic activity and there is a strong and often unmet demand from visitor markets, there is no current evidence to suggest any similar issues are being experienced in South Oxfordshire and Vale of White Horse, where tourism as an economic activity sits alongside other robust economic sectors. The previous Conservative Government planned to introduce a mandatory short-term lets register, in order to support local people in areas where high numbers of short-term lets were preventing them from finding housing they could afford to buy or rent. The register would have provided us with more accurate information on the number of short-term lets locally and any potential impacts on our housing stock. However, it is not clear whether the new Labour Government will continue with this plan and/or the proposed changes to the UCO (i.e. introducing a new planning use class created for short-term lets not used as a sole or main home) or other new Permitted Development Rights relating specifically to changes of use from residential to short-term let and vice versa), so current no further actions regarding short term lets is justified

Part 3 seeks to strike an appropriate balance between supporting proposals for overnight accommodation and protecting the surrounding area from any adverse impacts. It does not specifically exclude hotels, but any proposals would need to be very modest in size. We agree that referencing 'small-scale' is somewhat vague, so we have amended the policy so that JT7 supports development proposals for new visitor accommodation (or minor extensions to existing premises) where they are of a scale, type and appearance appropriate to the locality, and where they meet the same site-specific criteria as before.

In light of our research findings (currently our 2024 Hotel and Visitor Accommodation Study), we have also included reference in the supporting text to the retention of existing overnight accommodation stock, there is a deficit/unmet demand for particular types of accommodation or where a lack of alternative sites means that such facilities would be difficult to replace.

The NPPF already includes very clear guidance on how proposals for development within the Green Belt should be assessed. There is, therefore, no need for a local policy which would simply repeat national policy.

Part 2 already makes specific reference to providing opportunities to link accommodation with walking and cycling routes such as the Thames Path or Ridgeway and Part 3 also states that visitor accommodation (of an appropriate scale,

type and appearance) will be supported outside existing settlements, subject to compliance with specific criteria.

We have amended Part 7 to confirm that, outside settlements, proposals for mooring stages will not be permitted, with the exception of temporary moorings required for operational reasons near locks or bridges. Part 7 already refers to suitable proposals for new visitor moorings in existing settlements, so proposals could be refused that had an adverse impact on public amenity/access. However, we would not support the removal of existing residential moorings, given the ongoing demand highlighted in the Oxfordshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA), which included an assessment of the current/future needs of boat dwellers.

Other general comments regarding Chapter 7: Jobs and tourism

Full Survey: Summary of main issues raised

- One respondent requested a specific policy to outline support for data centre development.
- One respondent suggested that the requirement to “ensure any external lighting scheme has a minimal impact in terms of light pollution” in the Harwell Campus policy should apply to all industrial areas.

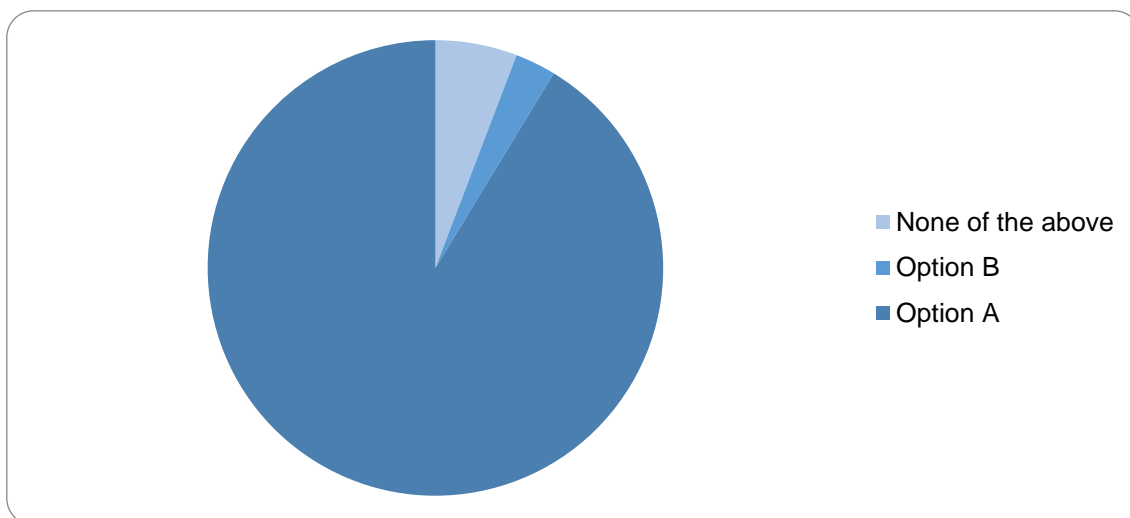
How the main issues have been taken into account

While we support data centre development where there is a need and have recently permitted data centres within the districts, including a specific policy to outline support for data centre development was not considered proportionate in line with our evidence base, and in any case planned NPPF changes will likely support data centres through decision taking. Policy CE11 (Light pollution and dark skies) requires all proposals for development to minimise light pollution.

Site allocations and Garden Villages

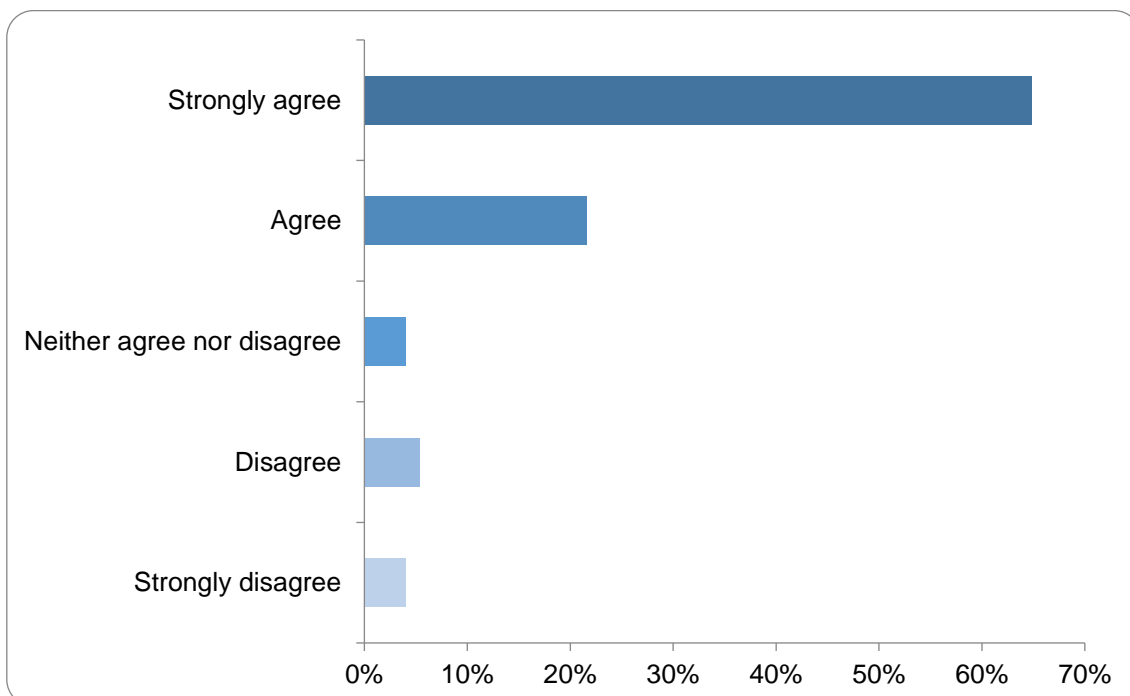
Policy LS1 – Proposals for Large Scale Major Development

Full Survey: Which option do you prefer?



Of the 69 people who responded, 91% preferred Option A, 3% preferred Option B and 6% selected none of the above. No respondents selected Option D or Option E. 521 people did not answer this question.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 74 people who responded to this question, 87% of people either agreed or strongly agreed with the proposed draft policy wording. 516 people did not answer.

Full Survey: Summary of main issues raised

Many responded more generally about the 'large scale allocations' in the Joint Local Plan. Points were raised in response to other policies, amongst others, Policy SP1, where we have determined that these issues are appropriately responded to within this consultation statement against those specific policies. Of those responding directly on this policy the following points were raised:

- There was a mix of views supporting and objecting to the inclusion of this policy.
- Duplication - Many raised concerns that the policy duplicates other policies in the JLP. There were suggestions about the requirements for large scale applications which could be merged into the relevant policy and achieve the same outcome and assist in clarity. There were specific suggestions to remove part g and set out requirements in the Validation Checklist along with documents considered required for a large-scale major application. Some raised specific points about policy criteria which were duplicated within the range of site allocation (AS) policies. There was concern about duplication with the validation checklist.
- Masterplanning - There were suggestions that it's unclear when an applicant would be required to agree a comprehensive masterplan with the relevant LPA and County Council, and that it would be inappropriate to require this prior to submitting an application. Some supported discussion with stakeholders before masterplanning is developed and engagement and masterplanning in general received support. One respondent suggested masterplans should also respect Neighbourhood Plan policies.
- Flexibility - There was concern that the requirements of criteria d reduce flexibility in the phasing of developments. Similarly, there was concern that flexibility is needed to ensure the most appropriate measures are provided and to allow for viability considerations, as each allocation will be different and be able to address different matters.
- A number of specific comments were raised about the policy content, including:
 - Some supported the policy setting out the requirements for large scale major development. They said this will provide clarity for applicants and existing residents on the scale of development and the level of information to be provided with any planning application. However one respondent criticised part g stating applications should be 'supported by relevant technical studies 'but not limited to' suggesting that there may be more beyond the list that is expected for a planning application which is at odds with the Councils own reasons for rejecting Option b (wishing to be clear on what is expected on planning applications).
 - There was a specific suggestion that the policy should refer to rail infrastructure improvements, include assessment of level crossing safety.
 - It was raised that LVIA/appraisal assessment is usually related to EIA requirements.
 - It was suggested that the policy provisions on large allocations in south Oxfordshire are not as strong as the adopted policies for these sites.

- There was a specific suggestion to reference connectivity with coherent active travel and public transport networks also beyond the site, to ensure developments connect well with existing settlements.
- One respondent raised scepticism about the 200 dwelling threshold for 'large-scale' development.
- One respondent said the requirement within Part 1(g)(xiii) to submit a sewage capacity assessment is not necessary and should be removed.
- One respondent encourages the adoption of Active design principles for all the focused allocated sites.
- One respondent asked for allotments to be considered.

The **Environment Agency** supported requirements for (depending on sites location and characteristics) technical studies and supporting documents: site specific flood risk assessment (FRA); Ecological Impact Assessment; Ecological and Landscape Management Plan to be provided to manage habitats onsite; Construction environmental management plan. They also welcome the intention for SFRA. They said site allocations will need to pass the Sequential Test and exceptions test may need to be passed for some sites. They said flood risk requirements should be included in policies for any site allocations located within the floodplain that pass the Sequential Test, and if needed, an Exception Test. They also commented that there is an opportunity to highlight that it may be possible to deliver flood risk benefits on our site allocations, such as increasing floodplain storage available on site.

National Highways were supportive of a policy for large scale development to ensure appropriate evidence is provided for applications. This should include the assessment of the impact of the site on the Strategic Road Network (A34/M40)

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) supported this policy in general. They consider that paragraph g should include a feasibility study of a new GP facility and/or an improvement or expansion of an existing GP facility. The insertion is important as it is to ensure the Policy is consistent with Policy HP3 of the draft plan, which is related to health care provision.

Oxford City Council suggested the policy should recognise that for edge of Oxford sites, the neighbouring uses or neighbouring communities may be within Oxford and should demonstrate strong linkages and connectivity.

Oxfordshire County Council supported the policy's clarity on what information we expect from large scale major developments. They have identified the following specific comments or changes they would like to see in the policy:

- The requirement for a Construction Environmental Management Plan should state that this includes a Construction Traffic Management Plan.
- Include a requirement for a cycling and horse riding assessment.
- The requirement for a transport assessment should include effects on Public Rights of Way.
- The requirement for social and community infrastructure could clarify that this also includes education.

- The policy should add a requirement for developments to submit an “innovation plan”.
- The requirement for an integrated water management plan, to include proposed foul and surface water drainage strategies, incorporating a sewage capacity assessment seems to deal with many separate issues at once and believes this needs clarifying.

How the main issues have been taken into account

Some comments criticising Option A were concerned that the strategy is not meeting a housing need. The strategy adequately reflects the justified housing and employment housing requirement.

The concern that this policy duplicates other policies and validation checklist is noted, however it was felt that for clarity for decision taking and to clearly express policy expectations, the approach taken in the JLP is the most appropriate. In some cases, suggestions to not duplicate and to delete parts of this policy text were made, however that would leave no policy coverage for speculative applications, and would then only provide policy coverage for allocations.

We consider that the content and scope of the policy is appropriate, subject to some additions detailed below.

Policy changes include:

- Additional reference to approved updates to masterplans in part c;
- Additions and clarifications in part g for consistency with other policies in the plan:
 - the need for Green Infrastructure statements;
 - a design code; and
 - contaminated land preliminary risk assessment.
- Cross reference to the specific requirements for masterplans in the AS policies within the footnote.

Residential focused allocations

Full Survey: Summary of main issues raised

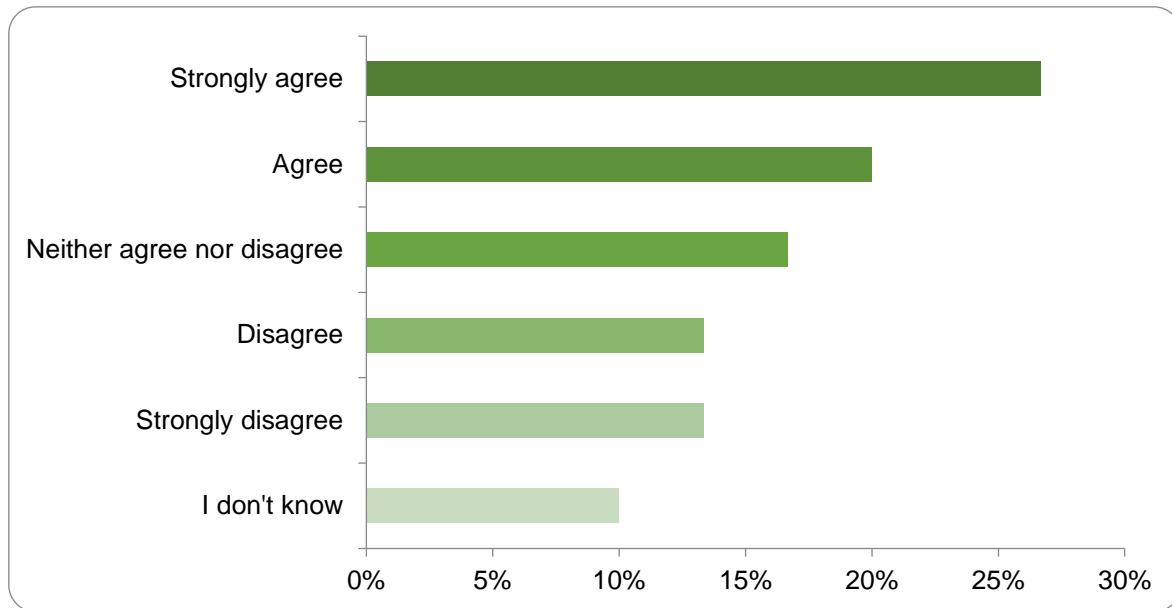
- There was also a mix of views expressed about the residential focussed allocations and some detailed comments about specific sites, such as supporting HELAA assessments and sites being excluded, suggestions for adding more information for site appraisals, some asking for allocations to be changed or deleted, some raising delivery challenges on sites as well as challenges to getting related infrastructure in place for the sites, suggestion that there are not enough new sites to meet new policy provisions.

How the main issues have been taken into account

The points raised in this section have been covered under each relevant site policy and considered through our site selection process.

AS1 – Land at Berinsfield Garden Village

Nutshell (Section 13): How far do you agree or disagree with tweaking (minor changes) the Land at Berinsfield Garden Village site allocation?



Of the 30 people who responded to this question, 47% of people either agreed or strongly agreed with tweaking (minor changes) the Land at Berinsfield Garden Village site allocation. 652 people did not answer.

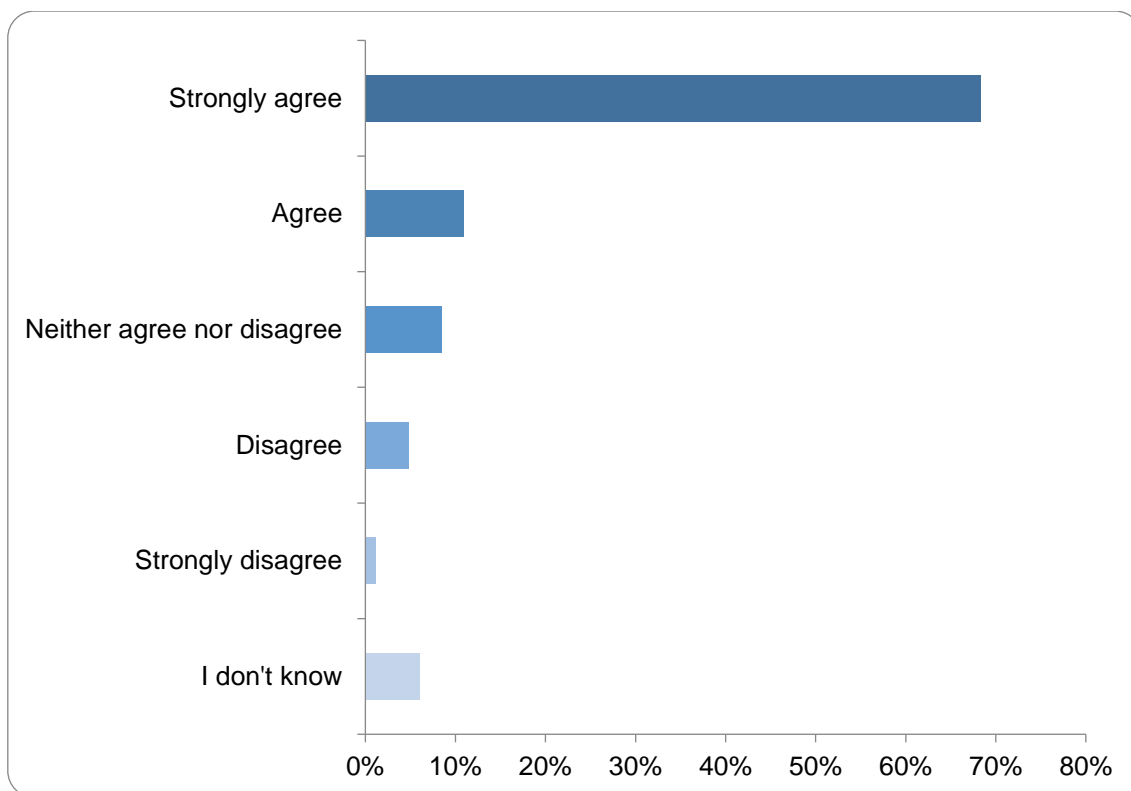
Nutshell (Section 13): Other comments on Land at Berinsfield Garden Village

25 people answered this question.

Respondents did not support the allocation at Berinsfield. Reasons for not supporting included a concern about the number of homes, how it will affect the existing community and road network capacity. Respondents felt the allocation should be reviewed within the context of cumulative growth in the area and the impact on adjacent villages.

Nonetheless, one respondent suggested the allocation should be larger to enable investment in the community to support facilities for the community. A number of comments referenced specific community facilities and groups and the potential for new facilities and improvements to existing facilities. Some respondents suggested improvements to the travel network for cars and cycling.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 82 people who responded to this question, 79% of people either agreed or strongly agreed with the proposed draft policy wording. 508 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- There were several comments in support of the regeneration package associated with the Berinsfield allocation policy, including specific reference to its sustainable location. Some wanted further clarity on the regeneration package.
- There were concerns that the allocation is not in accordance with spatial strategy. Noting that Berinsfield is identified as a Tier 3 settlement where only certain forms of development are appropriate.
- Some respondents raised doubts over the deliverability of the site, and specifically the deliverability of the regeneration package, which is key to the inseting of the village and allocation in the Green Belt. It was also raised how the delivery of the Garden Village was crucial to the sites release from the Green Belt. Concern has been raised about the combined impact of policies, e.g. the affordable housing mix impact on viability, which could potentially have a knock on impact on the regeneration package. It has also been raised that there should be flexibility in the quantum of homes delivered in the policy wording, to ensure the necessary regeneration benefits for the existing village can be delivered.
- Referring to the concept plan, some concerns were raised that it has not been informed by technical or environmental evidence, or engagement with site promoters or local community. There was a suggestion that reference to the

plan should be removed from the policy text. Others commented that a large proportion of the site is identified for green infrastructure in the concept plan, and the vulnerability of this area to development in the future.

Infrastructure:

- Comments varied from supporting the proposed infrastructure measures, to requesting that consideration be given to additional measures. Comments highlighted how the delivery of infrastructure was key to the release of the site from the Green Belt. These comments touched on a number of things, such as:
 - Support for the delivery of a new secondary school on site
 - Support for a skills centre or alternative educational offer
 - Support for Berinsfield to Oxford active travel route
 - Requesting that consideration be given to increasing capacity to A415 and A34
 - Concerns over travel links and the road through Drayton St Leonard not being suitable, with the new bypass not overcoming issues
 - Ensuring the policy text acknowledges proportional contributions in line with the Regulation 122 tests towards off-site mitigation measures
 - Requesting amendments to refer to Oxfordshire County Council's requirement for two accesses to the site
 - Suggestion to refer to a new Sports Centre, Health Centre, School, and Hub
 - Suggestion for inclusion of provision for roman road cycle track to Cowley/East Oxford
 - Suggested addition of mini park and ride
 - Add wording to refer to cycle route along the A4074 to Wallingford; and
 - Add flexibility to library provision.
- Some comments were concerned with bus services. One raised potential issues with the expansion of the settlement away from the existing bus stops on the A4074 and the need to provide good cycling routes to/from the bus stops for future residents. Also, to have an excellent bus service, you need a high level of usage.

Other comments:

- Remarks have been made about the biodiversity net gain policy requirements, with some suggesting that more should be done, whilst others suggesting less. It was suggested that the policy includes no reference to enhancing the natural environment, with little emphasis on enabling access to the green/blue infrastructure. Some comments said that the policy needs to seek exemplary delivery of biodiversity, suggesting a minimum of 25% biodiversity net gain. Other suggestions included that the policy wording should be amended so that the interventions are not pre-empted.
- Some comments noted the importance of consultation and collaborative working on the masterplan, with discussions taking place with stakeholders.

There was a suggestion that the masterplan should be prepared in collaboration with the District Council and Berinsfield Parish Council.

- Questions were raised over the trajectory and build out rate, asking whether delivery in the south-west sector could begin earlier. It was also raised how the build out rate may cause issues associated with the delivery of services, such as buses.
- Suggestion from a site promoter that the development of another site nearby would support the allocation at Berinsfield.
- An Ancient Tree Inventory should be completed.
- Historical land contamination needs to be considered and an appropriate SuDS plan agreed. A FRA will need to be completed.

Oxfordshire County Council welcomed the proposed policy wording referring to the delivery of the regeneration needs of Berinsfield. They made detailed comments on the proposed policy wording, particularly relating to education, archaeology, infrastructure and transport. They also highlighted the importance of effective integration for walking and cycling between the existing village of Berinsfield and the allocation and beyond.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height and bird strike safeguarding zones. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones, and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Thames Water highlighted that upgrades to water supply and wastewater infrastructure networks are likely to be required. They stated the councils and developer should engage with Thames Water at the earliest opportunity to agree appropriate phasing.

National Highways requested early engagement in the development of this site.

How the main issues have been taken into account

The councils remain committed to the inclusion of this site as a reasonable and sustainable option as it will deliver a regeneration package for Berinsfield, ensuring long term benefits for existing and future residents of the village. We recognise the concerns that people have around the appropriate delivery of infrastructure on the site; the policy text has been updated to reflect the most up to date position on the infrastructure. This is informed by credible evidence, including the Infrastructure Delivery Plan. This has resulted in a number of updates relating to education, leisure and transport infrastructure.

The council is satisfied that the policy and regeneration package is supported by the most up to date evidence available at this stage, and we recognise that this may change as the allocation progresses towards adoption.

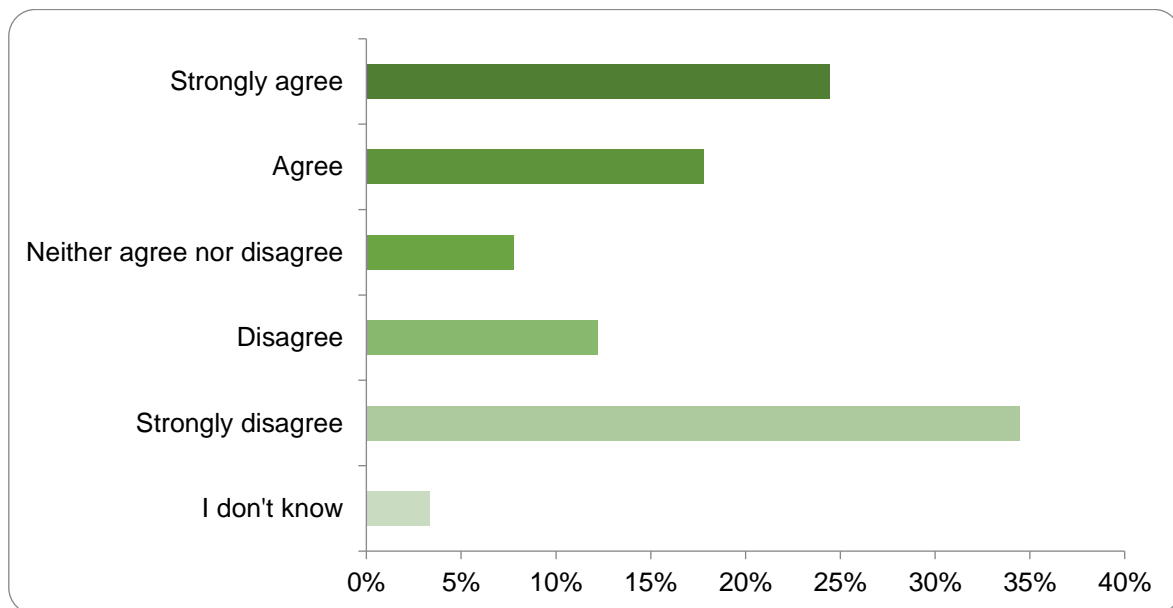
The council recognises the concerns raised with the concept map; it establishes a concept for site which should be used alongside robust evidence to inform any forthcoming masterplan and development proposal.

Policy changes include:

- The policy text has been amended to respond to the latest evidence and to address some of the issues raised in the Preferred Options Consultation. One of these key changes in the policy text is addressing the need for housing for older people, and pitches for gypsies and travellers. The regeneration package has been reviewed to ensure the policy and supporting text reflects the evidence.
- The concept plan has been updated in response to the latest evidence flooding. The developable area in the south-west corner of the site showing has been amended to remove areas of development from Flood Zone 3, as well as a small amendment to the local centre to remove this from Flood Zone 3.

AS2 – Land adjacent to Culham Science Centre

Nutshell (Section 13): How far do you agree or disagree with tweaking (minor changes) the Land adjacent to Culham Science Centre site allocation?



Of the 90 people who responded to this question, 42% of people either agreed or strongly agreed with tweaking (minor changes) the Land adjacent to Culham Science Centre site allocation. 592 people did not answer.

Nutshell (Section 13): Other comments on Land adjacent to Culham Science Centre

75 people answered this question.

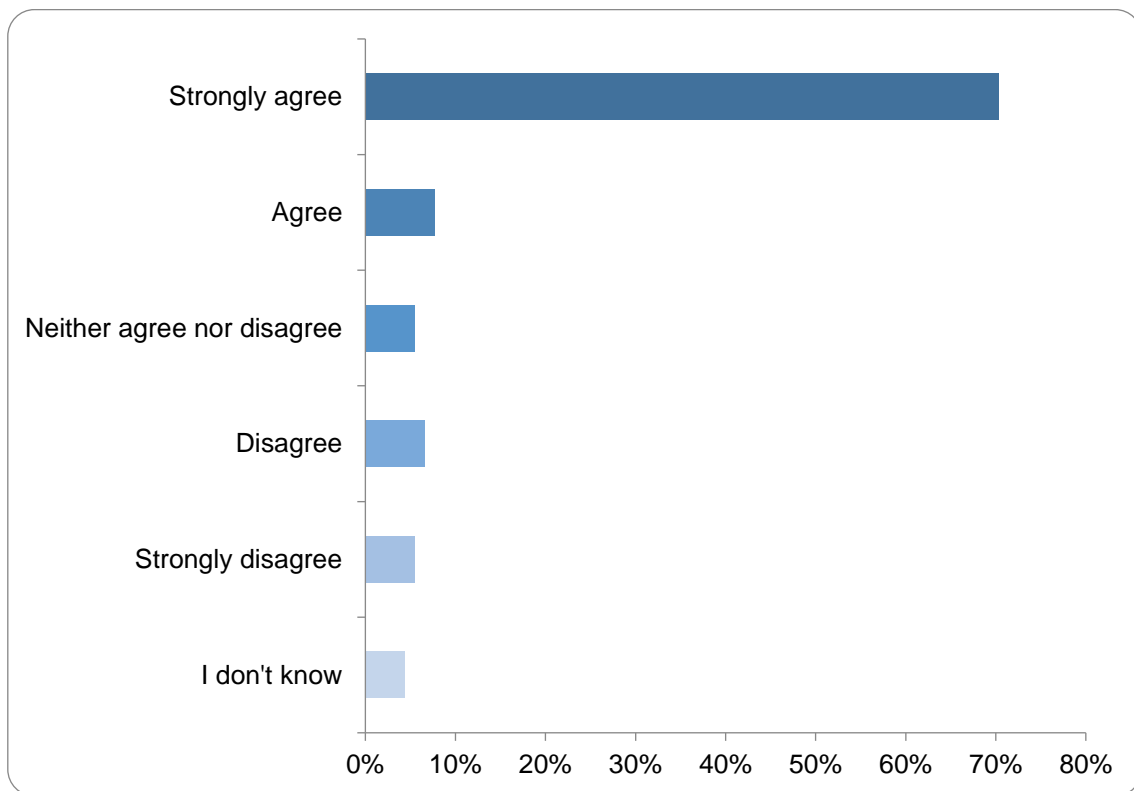
The largest number of comments received about the allocation at Culham Science Centre raised suggested there were too many homes proposed. Respondents did

not believe the road infrastructure would cope and had general traffic concerns, with some highlighting that the HIF1 road infrastructure would be needed to enable development. Other respondents were concerned about the impact of cumulative growth in the area, with some thinking development should be proportionate to the surrounding area.

The impact on landscape was raised by some, who thought the existing space is valued and should be preserved, including the reinstatement of the land as Green Belt. Respondents raised concern about flooding and pollution, alongside the capacity of existing education and health care facilities.

Some comments acknowledged the proximity to employment and the rail network, particularly as an opportunity that should be utilised and improved through any development.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 91 people who responded to this question, 78% of people either agreed or strongly agreed with the proposed draft policy wording. 499 people did not answer.

Full Survey: Summary of main issues raised

Site allocation - overall

- There was a varied response to the allocation - many respondents felt that the number of homes allocated should be much lower and was disproportionate to the size of Culham village. Many suggested that only the brownfield part of the site (Culham No.1) should be used for development, close to the railway

station. Some suggested that the No. 1 site should be the only housing development site. On the other hand, some suggested the whole site should be deallocated.

- Respondents that supported the allocation often suggested the site is in a sustainable location for development, near employment and a railway station. Conversely, some respondents felt the allocation was unsustainable and a parish council queried whether it is proximate to existing towns, infrastructure and services.
- Many people commented that the homes aren't needed (e.g. in excess of the housing requirement set out in HOU1); that there is a housing oversupply; that there has been substantial windfall development in the area and therefore housing needs for the area have fallen.
- There was a mixed response regarding the No. 1 site – some suggesting that the allocation could be reduced, as employment demand was satisfied elsewhere (e.g. at other science parks); there were also comments that the No. 1 site is not currently science-focused; that increased employment at Culham Campus is not reliant on the new housing proposed; and some supported the retention of employment land at the No. 1 site.

Infrastructure

- A number of people expressed concern over the potential traffic/road infrastructure impact of development (such as negatively impacting Abingdon). Some raised the issue of pollution/carbon impacts from new infrastructure. Some respondents commented that the development would be too car dependent. There was a suggestion that the policy should be conditional, in relation to infrastructure improvements. A number of comments suggested improvements to pedestrian and cyclist access in a variety of locations surrounding the allocation.
- Some groups/parish councils suggested the masterplan should prioritise active travel and modal shift, aligning with local area travel plans, including LCWIPs, making the most of opportunities for a multi-modal transport hub at Culham railway station. Some comments suggested an expansion of rail links and ways to improve Culham Station (e.g. sustainable design ideas).
- There was a suggestion that consideration be given for bus routeing along the A415 and through the site, for passengers not intended for Culham.
- Some, particularly those who wished for the site size to be reduced, suggested replacing the references to HIF-1 roads and bridges; and alternative policy wording was also suggested, should HIF1 not progress. Some suggested that removing/reducing the allocation would remove the need for additional infrastructure, with some respondents questioning the need for the HIF1 scheme. There were a number of comments contending that the proposed bridge link crossing the Thames is unfunded and questioning its deliverability.
- There was a comment that the proposed walking/cycling bridge and accessible natural green spaces should be installed in advance of new housing to connect with Abingdon; some comments said this bridge would

increase recreational pressure on Radley Lakes, and should be planned in accordance with other connected neighbourhood plans and Radley Lakes masterplan. Others welcomed the plans for the bridge, with suggestions regarding its specifications/design.

Flooding

- A number of people expressed concern with flooding impact/potential for flooding in the area, including Culham village and its existing homes, Sutton Courtenay and Appleford, and impacts on water quality in the River Thames. Newly-emerging sewage constraints were also highlighted by some groups/parishes.

Green Belt / Landscape

- A number of people commented that the land to the west of the railway should be returned to Green Belt, disagreed with the Green Belt impact and/or suggested that the Green Belt should not be developed.
- There was a suggestion to further protection of ancient woodland and trees with a recommendation for setting a tree canopy cover target as part of the policy.

Other comments

- The site developer welcomed that the strategic allocation was being carried forward; supported the concept plan changes and the amendments reflecting the employment-led mixed-use at the No 1 site. They highlighted the site would deliver sustainable development and ensure the strategic housing and employment needs of the districts are met. They provided detailed comments regarding the infrastructure requirements set out. Regarding transport infrastructure requirements they stated further work was required to determine the extent of any such works and how, by whom and when they might be delivered.
- The site developer highlighted concerns with the requirement to provide a 'walking and cycling bridge and associated connectivity and paths', asking for further clarity on some of the wording of requirements and suggesting some amendments. They also suggested that the safeguarded railway land is omitted. They suggested detailed wording amendments to reflect their comments.
- A wildlife trust welcomed the content on landscaping, GI and biodiversity net gain, as well as protection for the Culham Brake SSSI. They considered that development of this scale in a sensitive location should have additional policy content for biodiversity, including the delivery of a nature reserve (along with details of how this should be delivered).

Thames Water commented that upgrades to water supply and wastewater infrastructure networks are likely to be required. They confirmed that the councils and developer should engage with Thames Water at the earliest opportunity to agree appropriate phasing.

National Highways requested early engagement in the development of this site.

Network Rail stated that the Thame Lane Bridge (bridge to the north of the station) needs PROW improvements with increased usage from the development. They supported the policy and highlighted that it positively identifies the improvements needed to Culham railway station.

Historic England commented that a minor change should be made to criterion l) acknowledging the importance of Nuneham Courtenay, not as a subset of a listed building or structure. They recommended including proportionate detail on Nuneham Courtenay in the supporting text, informed by the evidence underpinning this allocation. In addition to conserving heritage significance, they recommended referring to enhancement where practicable and proposed wording to address this.

The **Environment Agency** commented: that part 'm' of the policy should be developed further to ensure the floodplain is safeguarded from built development; that a headroom capacity assessment is needed to ensure the Dry Water Flow permit is not exceeded; and that any SUDS scheme will need to consider previous land contamination. They welcomed commitments to the enhancement of the River Thames floodplain and highlighted the policy should note that the ecological buffer zone for the river Thames must be free from development and infrastructure including footpaths, cycle paths, lighting and recreational infrastructure. They said plans will need to show how the watercourse and its buffer zone will be protected from a massive increase in disturbance from the proposed development.

Oxfordshire County Council suggested that wording should be amended in relation to criterion f (to clarify transport infrastructure, bus services and walking/cycling provision and refer to the HIF1 scheme), criterion c (education capacity) and added in relation to archaeological geophysical surveys. They highlighted some developments will need to incorporate at least elements of car-free provision. They commented that the allocation location offers potential for a significant sustainable development. They were pleased to note the inclusion of provision of a new cycling and walking bridge across the River Thames. They stated that the comprehensive masterplan will be expected to be informed by detailed discussions with the rail industry regarding plans for Culham Station improvements and any supporting future rail infrastructure.

They pointed out that the proposed allocation is within and adjacent to the Thames and Lower Thames Valley – Oxford to Cholsey Safeguarded Area and contains a permitted waste site. They wished to see the waste site retained as part of the draft policy. They highlighted that points in SOLP 2035 Policy STRAT9 relating to the extraction of minerals prior to non-mineral development taking place were not included within the proposed policy. They hoped to see any viable mineral extracted before development were to take place and for any future proposed development to include mitigation for potential mineral working within the Mineral Safeguarded Area. They supported aiming to retain and optimise the employment use in the area and hoped this included the recycling site which would come under sui generis use.

How the main issues have been taken into account

The councils note the mixed response to this allocation and remain committed to the inclusion of this site as a sustainable, high-quality development, close to employment and transport links, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes. The indicative concept plan has been set out to sensitively take into account all known site constraints identified through our supporting evidence.

The exceptional circumstances that justified the removal of the site from the Green Belt in 2020 are set out in the South Oxfordshire Local Plan 2035 and its evidence base.

Water infrastructure planning is not a unique issue to Culham. Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

Policy LS1 (Proposals for Large Scale Major Development) highlights that development proposals be supported by relevant technical studies and supporting documents, such as a site-specific flood risk assessment which takes into consideration the findings and recommendations of the Strategic Flood Risk Assessment and an integrated water management plan to include proposed foul and surface water drainage strategies, incorporating a sewage capacity assessment.

Extracting minerals prior to development taking place is addressed via Policy CE13 (Minerals Safeguarding Areas) and Policy CE12 (Soils and Contaminated Land) provides detailed requirements for assessing and addressing land contamination. The supporting text to Policy AS2 highlights that the allocation is in the Thames and Lower Thame Valleys Mineral Consultation Area, Safeguarding Area and Resource Area.

We have generally removed cross-references to other policies because these are unnecessary, as any planning application will be assessed against all other relevant policies in the plan.

Officers will continue to work with the site promoters and other stakeholders, including Oxfordshire County Council, to bring forward a scheme for development that is appropriately supported by deliverable infrastructure, including community infrastructure.

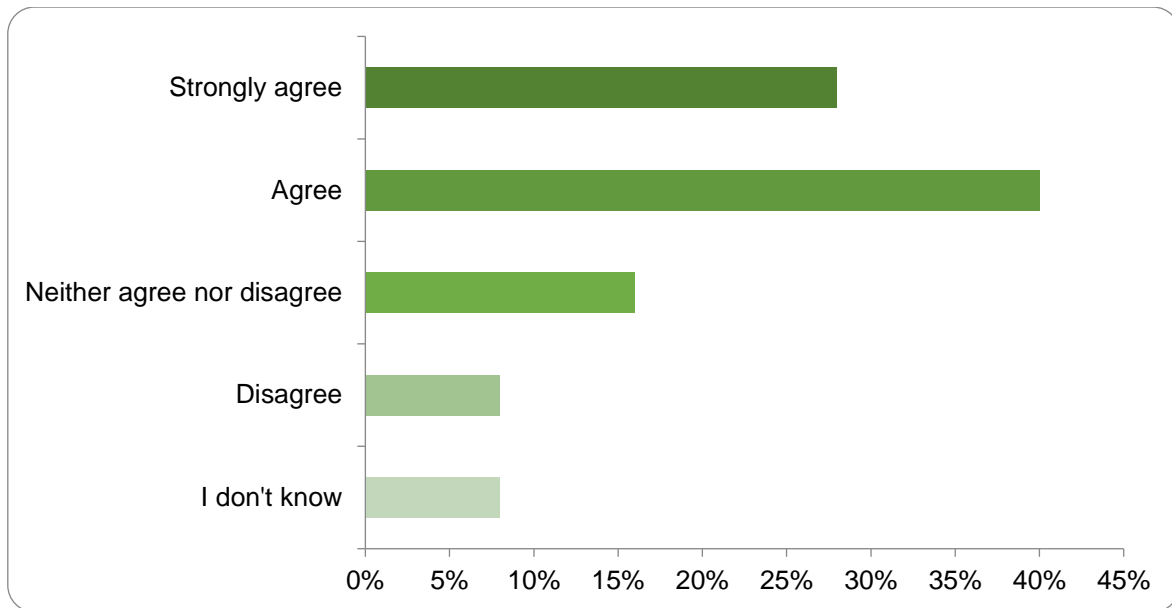
Policy changes include:

- The policy wording has been expanded regarding transport mitigation measures – these include bus improvements/bus infrastructure and provision of scheduled bus services between Berinsfield, Culham and Abingdon-on-Thames as well as Didcot and Oxford's Eastern Arc. Bus routes within the site, at the site access points, and in the vicinity of the site should include bus priority measures where appropriate.

- Wording has also been updated regarding transport infrastructure, bus services and walking/cycling provision, the HIF1 scheme and clarification regarding education capacity.
- The policy has been amended in light of the latest evidence available – such as including details on requirements for housing with care for older people and utilisation of the Infrastructure Delivery Plan to inform infrastructure requirements (including for education, transport (including bridges) and healthcare) and to ensure allocations are deliverable. Other key aspects of the policy, such as green infrastructure and flood risk, have been considered through evidence base documents and fed into relevant policies.
- The policy now highlights requirements for a layout where there is no built development within Flood Zones 2 and 3, other than essential and green infrastructure.
- Additional wording has been added to the policy to highlight that site layout and form should respect and conserve the heritage assets within and beyond the site; and that development within the setting of heritage assets should take the opportunity to enhance or better reveal their significance.
- The policy wording has been updated, asking proposals to meet the biodiversity net gain requirement through a draft Biodiversity Gain Plan which is integrated into the entire masterplan, maximising the delivery of onsite biodiversity.
- To ensure clarity, wording has been added regarding public rights of way network enhancements.
- Additional wording has been added regarding a transport and movement hierarchy which promotes non-car modes of travel and permeability across the site and beyond.
- Proportionate detail on both Nuneham Courtenay Registered Park and Garden and Nuneham House has been included in the supporting text,
- Culham Science Centre has been updated/renamed throughout as Culham Campus.
- The 'Railway Safeguard' on the concept plan has been renamed as the 'Railway Buffer'.

AS3 – Land South of Grenoble Road, Edge of Oxford

Nutshell (Section 13): How far do you agree or disagree with tweaking (minor changes) the Land South of Grenoble Road site allocation?



Of the 25 people who responded to this question, 68% of people either agreed or strongly agreed with tweaking (minor changes) the Land South of Grenoble Road site allocation. Nobody selected strongly disagree. 657 people did not answer.

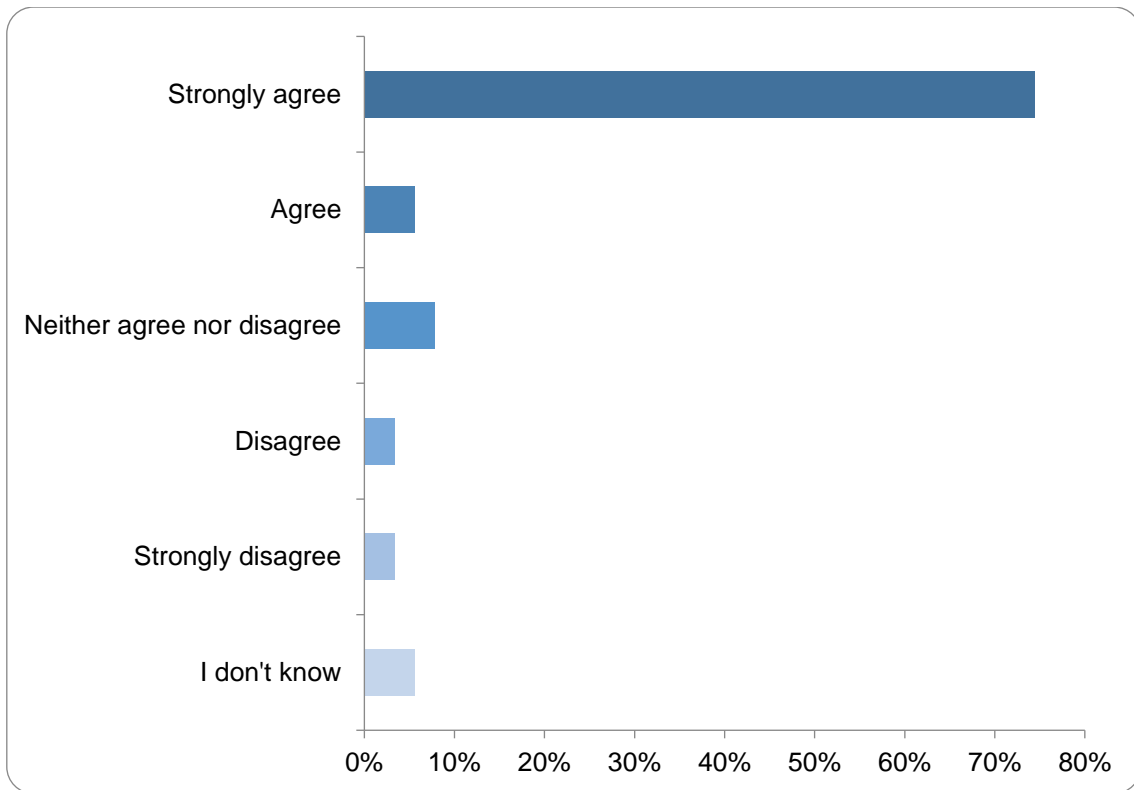
Nutshell (Section 13): Other comments on Land South of Grenoble Road

20 people answered this question.

Most comments received supported the allocation and the sustainability of delivering new housing to meet Oxford's needs on the edge of the city. The location enables public transport links into the city and delivers homes close to jobs, with support for high levels of affordable housing in this location.

Nonetheless, some respondents did not support the application and felt there were too many homes and too much development proposed. In particular, respondents were concerned about the loss of Green Belt, habitats, farmland and land used for recreation.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 90 people who responded to this question, 80% of people either agreed or strongly agreed with the proposed draft policy wording. 500 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- Support for the location due to the site’s relationship to Oxford and the availability of jobs, sustainable transport options, and other infrastructure.
- A number of respondents suggested the site should be deleted and redesignated as Green Belt.
- Some respondents questioned how many homes would be delivered within the plan period.

Infrastructure:

- Some concerns about the capacity of the sewage treatment works.

Other comments:

- Support for biodiversity net gain, Green Belt reinforcements and landscaping, particularly to take account of the consented development of the nearby solar farm.
- Some respondents expressed that the policy should go further to reduce private vehicle travel on site.
- Some respondents suggested the policy should make reference to the reopening of the Cowley branch line.
- Some respondents questioned the functionality of the mobility hub on this site.

- The site owners requested edits to the policy wording to allow for greater flexibility in how to deliver the requirements of the policy.

National Highways requested early engagement in development of this site.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land. They had significant concerns about infrastructure capacity and water quality related to Oxford sewage treatment works which need to be explored through the Water Cycle Study.

Oxford City Council welcomed the site allocation. They suggested that it's unclear why the delivery by 2041 is now lower than that previously assumed to be delivered by 2035 and why the annual delivery rate is lower. They also asked how the revised assumptions impact on contributing 2,480 homes towards Oxford's unmet housing needs by 2035. They were concerned that details and context was not carried over, or diluted, from the previous policy. They asked for reference to the relocation of Oxford United Football club and flexibility to respond the re-opening of Cowley Branch line. They highlighted that Cowley Branch line should now be a 'transport mitigation measure' and now make financial contributions.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height safeguarding zone. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in this zone, and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Historic England objected to the policy as currently drafted. They advised that the archaeological potential of the site is high and that a desk-based archaeological assessment at this stage would be a useful exercise. They noted that if important remains are encountered that merit preservation in situ, this could have a significant impact on what is delivered through any scheme. They anticipated that the policy will need to include a requirement on a suitable approach to the site's archaeological potential/remains.

Natural England requested that further information be provided regarding the provision of green infrastructure and open space at this site given the close proximity of the allocation (and AS4 and AS5) to the edge of Oxford City and a number of SSSI located in this area, such as Brasenose Wood & Shotover Hill SSSI, Lye Valley SSSI, New Marston Meadows SSSI, Iffley Meadows SSSI and Sydlings Copse & College Pond SSSI which could potentially experience an increase in visitor numbers and recreational disturbance from the resulting increase in population.

Oxfordshire County Council made detailed comments about the wording of the policy, particularly for requirements related to education, transport and infrastructure, but generally supported the site allocation. Principally, they requested that the policy references the reopening of the Cowley Branch Line.

Thames Water commented that upgrades to water supply and wastewater infrastructure networks are likely to be required; and the councils and developer

should engage with Thames Water at the earliest opportunity to agree appropriate phasing. They stated this catchment is subject to high infiltration of groundwater into the sewer network and the developer should liaise with the LLFA to agree an appropriate surface water strategy following the sequential approach before considering connection to the public sewer network.

How the main issues have been taken into account

The councils note the mixed response to this allocation and remain committed to the inclusion of this site as a sustainable, high-quality development, close to employment and transport links, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes. The indicative concept plan has been set out to sensitively take into account all known site constraints identified through our supporting evidence.

This policy has been updated, taking into account the issues raised and further evidence received. The location of the mobility hub is outside the scope of the policy, and is for consideration by Oxfordshire County Council.

Water infrastructure planning is not a unique issue to Grenoble Road. Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

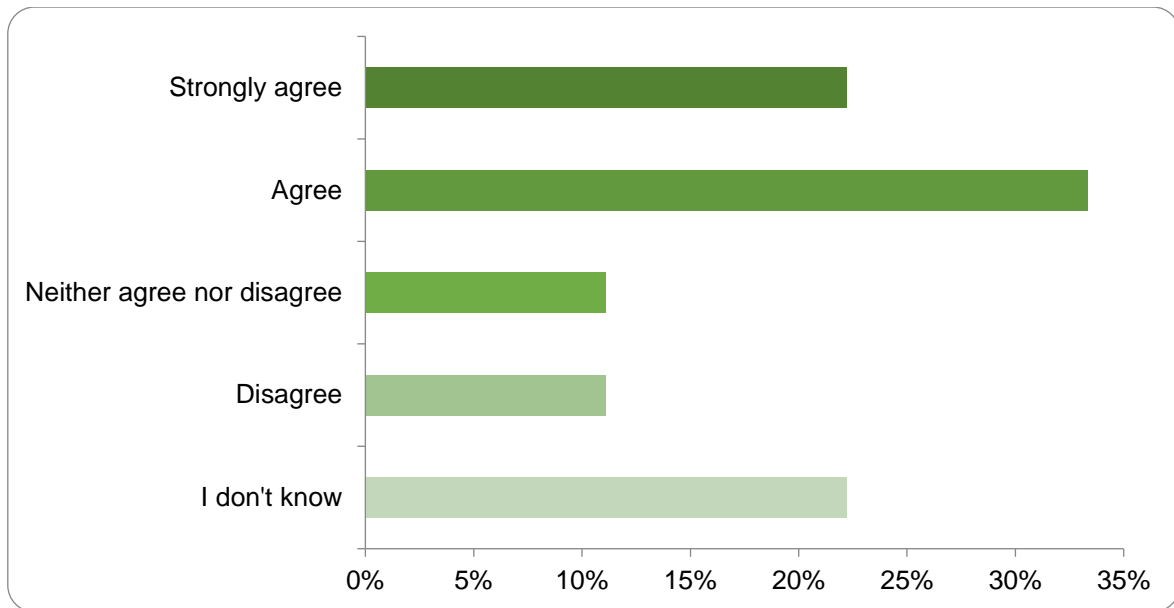
Other more technical issues raised and requests for detailed assessments will be addressed through the planning application process.

Policy changes include:

- The policy has been amended to improve the requirements around reducing private vehicle travel on the site and to outline expected infrastructure requirements.
- The supporting text has been amended to clarify how much of the site is expected to be delivered within the plan period and to reference the potential reopening of the Cowley Branch Line.
- Other aspects, such as green infrastructure, the capacity of the sewage treatment works, and flood risk, have been considered through evidence base documents and the policy reflects any updates related to the site.

AS4 – Land at Northfield, Edge of Oxford

Nutshell (Section 13): How far do you agree or disagree with tweaking (minor changes) the Land at Northfield site allocation?



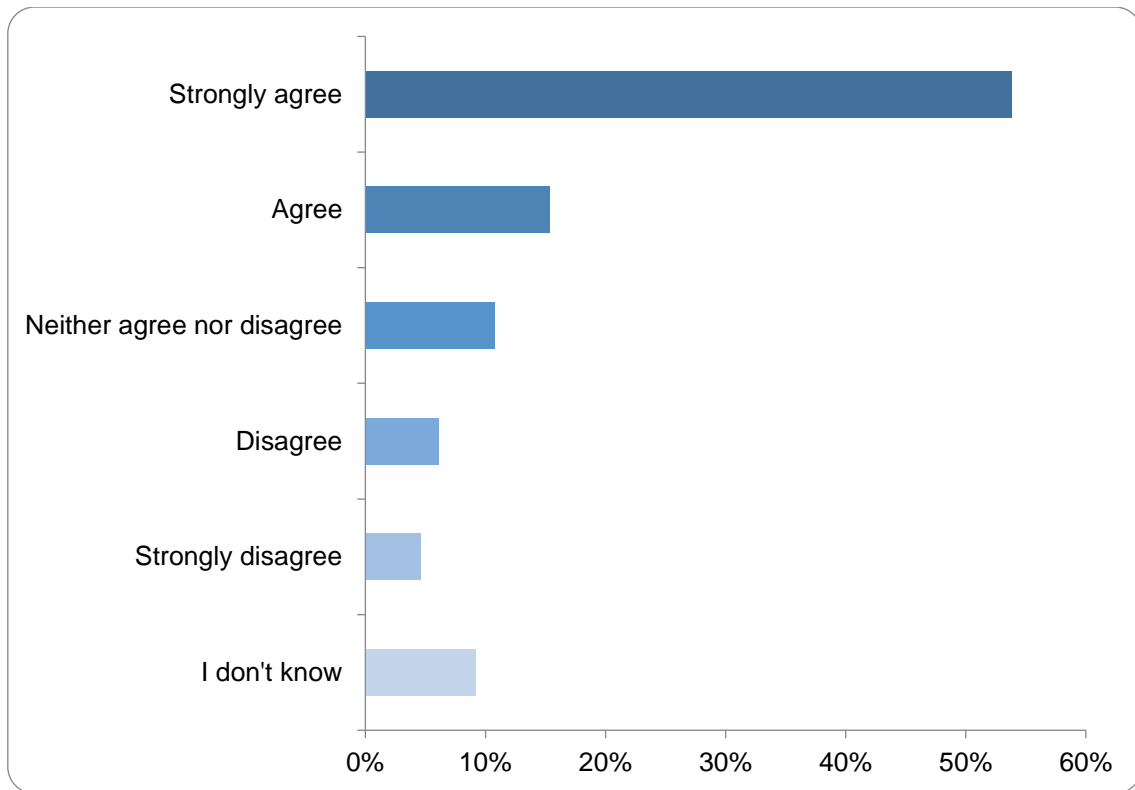
Of the 9 people who responded to this question, 56% of people either agreed or strongly agreed with tweaking (minor changes) the Land at Northfield site allocation. Nobody selected strongly disagree. 673 people did not answer.

Nutshell (Section 13): Other comments on Land at Northfield

5 people answered this question.

The comments received did not support the allocation at Northfield and extra developments, as there are too many houses. Improvements should be made to existing developments. The allocation should be reviewed, and the Green Belt should be reinstated.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 65 people who responded to this question, 69% of people either agreed or strongly agreed with the proposed draft policy wording. 525 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- Support for the location due to the site’s relationship to Oxford and the availability of jobs, sustainable transport options, and other infrastructure.
- A number of respondents suggested the site should be deleted and redesignated as Green Belt.
- Some concerns regarding the deliverability of the site.
- Some respondents requested clarification on how many homes would be delivered within the plan period.

Infrastructure:

- Some respondents suggested the policy should make reference to the reopening of the Cowley Branch Line.

Other comments:

- Support for biodiversity net gain, reinforcement to the Green Belt and appropriate landscape mitigation.
- Some respondents expressed that the policy should go further to reduce private vehicle travel on site, and others requested sufficient parking for residents.
- Some respondents requested that the indicative concept plan is updated to show a more current reflection of the local centre.

- Some respondents requested greater consideration of the relationship between the site and Garsington.
- The site owners requested edits to the wording on the policy to allow for greater flexibility in how to deliver the requirements of the policy.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater, contaminated land, fisheries and biodiversity. They had significant concerns about infrastructure capacity and water quality related to Oxford sewage treatment works which need to be explored through the Water Cycle Study.

Oxford City Council welcomed the site allocation. They asked for reference to flexibility to respond to the re-opening of Cowley Branch line. They highlighted that Cowley Branch line should now be a 'transport mitigation measure' and now make financial contributions.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height safeguarding zone. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in this zone and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxfordshire County Council made detailed comments about the wording of the policy, particularly for requirements related to education, transport and infrastructure, but generally supported the site allocation. Principally, they requested that the policy references the reopening of the Cowley Branch Line.

Natural England requested that further information be provided regarding the provision of green infrastructure and open space at this site given the close proximity of the allocation (and AS3 and AS5) to the edge of Oxford City and a number of SSSI located in this area such as Brasenose Wood & Shotover Hill SSSI, Lye Valley SSSI, New Marston Meadows SSSI, Iffley Meadows SSSI and Sydlings Copse & College Pond SSSI which could potentially experience an increase in visitor numbers and recreational disturbance from the resulting increase in population.

Thames Water commented that water supply infrastructure networks are likely to be required and the councils and developer should engage with Thames Water at the earliest opportunity to agree appropriate phasing. They stated this catchment is subject to high infiltration of groundwater into the sewer network and the developer should liaise with the LLFA to agree an appropriate surface water strategy following

How the main issues have been taken into account

The councils note the mixed response to this allocation and remain committed to the inclusion of this site as a sustainable, high-quality development, close to employment and transport links, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes. The indicative concept plan has been set out to sensitively take into account all known site constraints identified through our supporting evidence.

This policy has been updated, taking into account the issues raised and further evidence received.

Water infrastructure planning is not a unique issue to Northfield. Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

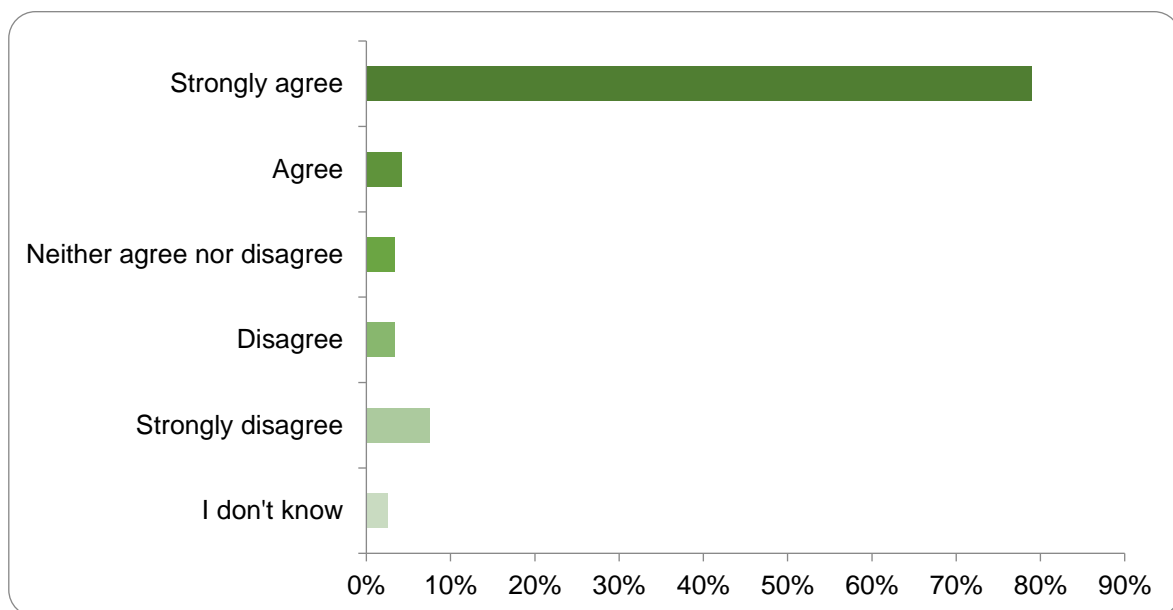
Other more technical issues raised and requests for detailed assessments will be addressed through the planning application process.

Policy changes include:

- The policy has been amended to improve the requirements around reducing private vehicle travel on the site and to outline expected infrastructure requirements.
- The supporting text has been amended to clarify how much of the site is expected to be delivered within the plan period and to reference the potential reopening of the Cowley Branch Line.
- Other aspects, such as green infrastructure, the capacity of the sewage treatment works, and flood risk, have been considered through evidence base documents and the policy reflects any updates related to the site.

Policy AS5 – Land at Bayswater Brook, Edge of Oxford

Nutshell (Section 13): How far do you agree or disagree with tweaking (keep main site, but delete the parcel of land at Sandhills) land at Bayswater Brook site allocation?



Of the 119 people who responded to this question, 83% of people either agreed or strongly agreed with tweaking (keep main site, but delete the parcel of land at Sandhills) Land at Bayswater Brook site allocation. 563 people did not answer.

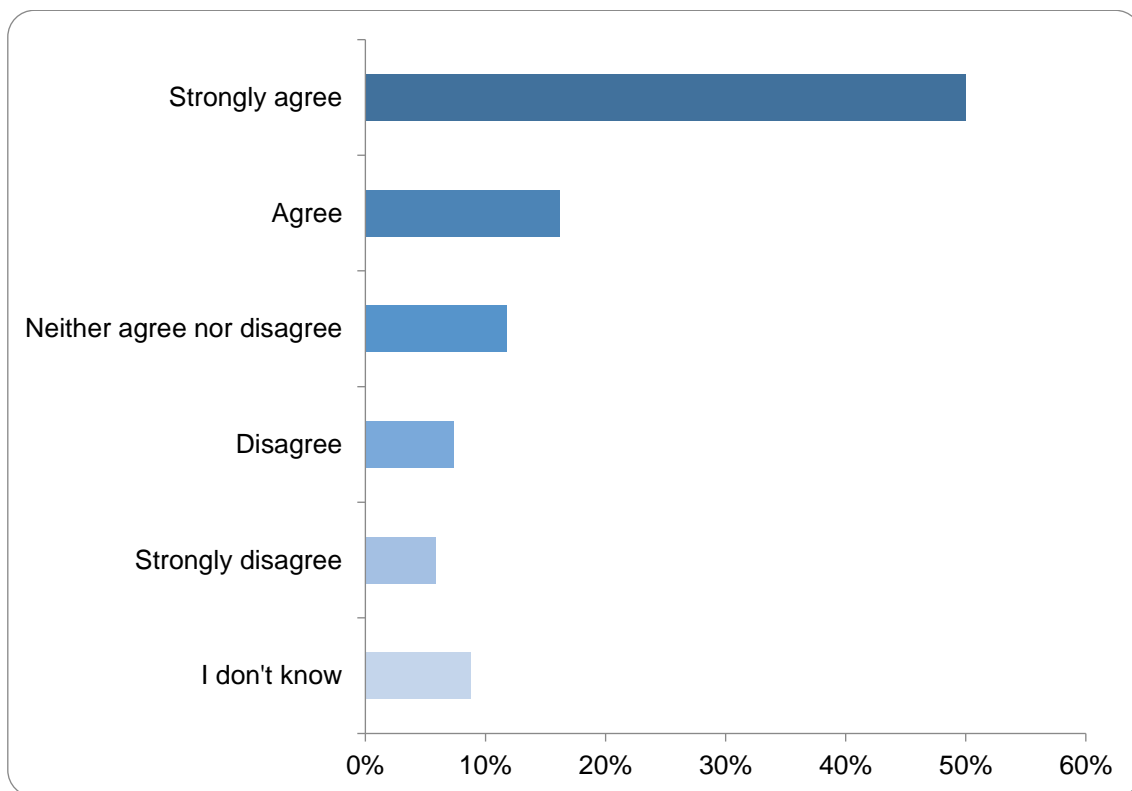
Nutshell (Section 13): Other comments on Land at Bayswater Brook

106 people answered this question.

A large number of respondents raised access issues, which they thought was unsuitable and inappropriate. In particular, respondents felt the access to Sandhills was an issue. Respondents supported the deletion of the Sandhills element of the allocation, particularly due to the loss of green space and negative impact on traffic associated with Sandhills. Some respondents felt that the whole allocation should be deleted. Reasons included the need to protect the Green Belt, the negative impact on the existing village and community, nature and flooding, the road network and other existing infrastructure (e.g., health facilities) being insufficient to accommodate growth, and a perceived contradiction with the objectives of the plan and national policy, particularly where it was not considered to constitute sustainable development.

With respect to particular development requirements, respondents felt that green space would be needed for the community, the bridleway should be retained, habitats and biodiversity should be protected and enhanced. High quality design and affordable and/or specialist housing were also important considerations. Biodiversity Net Gain should be considered and delivered on site.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 68 people who responded to this question, 66% either agreed or strongly agreed with the proposed draft policy wording. 522 people did not answer.

Full Survey: Summary of main issues raised regarding Policy AS5 (general)

Site allocation – overall:

- There were several comments in favour of the allocation, mentioning support for the location, in terms of its sustainability (close to the city/employment, with good transport links); the potential to cut carbon emissions, compared with development further from Oxford; helping Oxford's unmet housing need / supporting employment in and around Oxford.
- Several comments were unsupportive of the allocation, frequently requesting that the whole Land at Bayswater Brook site allocation, not just Sandhills, should be removed as a strategic development site. Reasons given included:
 - transport infrastructure concerns, including traffic/safety/access concerns; comments that the concept plan's indicative route/alternatives have not been agreed; lack of data to understand traffic impact / residual impact on surrounding communities. There were also suggestions to make it a car-free development;
 - current flooding/sewage and water run-off concerns – with concerns regarding potentially increased flooding with further development and reference to the EA's previous objection to planning applications for this allocation;
 - concern for the health and wellbeing of current residents;
 - negative impact of development on the overall environment, the SSSIs and biodiversity/wildlife/habitats (e.g. Barbestelle bats, trees, fens). There was a reference to wildlife trusts' concerns with planning applications for this allocation; a wildlife trust requested amendments to further protect SSSIs, provide biodiversity net gain and for provision of several large areas of biodiversity-rich habitat to be provided;
 - issues with delivery of a policy-compliant allocation and issues with the allocation's planning applications (including above concerns about flood risk, negative SSSI impacts and mitigation of highway network impacts); and
 - surplus of housing – e.g. some comments that the site is not required.
- Some supported the removal of the Sandhills part of the previous allocation.
- Some site promoters suggested the allocation should be supported by additional, smaller sites to help with housing delivery, highlighting a need for further allocations from a range of different sized sites. Others suggested the allocation should be amended, made more comprehensive, reflect the planning application and/or increase the number of dwellings. Additional sites in other areas of the districts and also adjacent to the allocation were promoted (suggested for reasons including sustainability, opportunities to provide comprehensive infrastructure/sustainable movement strategies, and for longer term growth).

Infrastructure:

- It was suggested the site should not be allocated because there is overall insufficient infrastructure capacity.

Other comments:

- Some comments made transport suggestions, such as joining up new edge of Oxford developments with circular bus routes and through provision of new walking/cycling routes, maximising trips via non-car modes and discouraging car-based development. A number of comments requested changes to the policy, including re-inclusion or updates to wording currently stated in the South Oxfordshire Local Plan 2035 Policy STRAT13 - Land North of Bayswater Brook (for example, the requirement for an archaeological survey and reference to air quality mitigation measures or alternative wording for infrastructure schemes). There was a request to set a tree canopy cover target as part of this policy, as well as a request to complete the Ancient Tree Inventory (ATI) for the area.
- There were a mix of comments regarding the Green Belt in relation to this policy – with some feeling that no Green Belt land (existing or removed) should be built on; and some supporting the current Green Belt boundary. A number of comments suggested an expanded Green Belt release (or an intention to safeguard land), suggesting a greater scale of allocation would provide better development capacity and remove any piecemeal approach. Others wanted clarification about whether the proposal to remove Sandhills from the allocation meant it would be redesignated as Green Belt.
- Comments, whether supportive or unsupportive of the policy, highlighted flood risk concerns in the overall area. Some asked that criterion (g) is amended to ensure that all built development and infrastructure (including SuDS) is located only within Flood Zone 1, and away from any areas retained in the Green Belt, with areas of Flood Zone 2 and 3 preserved as accessible green space, entirely free of any development related structures.
- There was a request to ensure the AS policies/housing figures and HOU2 table are consistent and clearly ‘add up’ when cross-comparing the two.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land, and biodiversity and fisheries. They stated that development at this site will increase flows to Oxford sewage treatment works. They highlighted significant concerns about infrastructure capacity and water quality related to Oxford sewage treatment works which need to be explored through the Water Cycle Study.

Oxford City Council welcomed the site allocation. They stated that details and location context (e.g. pedestrian and cycle links across the A40) haven’t been carried forward or are diluted and that a trajectory would help to clarify the assumed commencement dates and delivery rates to confirm that the full number will be delivered by 2036.

Oxfordshire County Council suggested that wording should be amended in relation to Parts (d)(i) (to address access and connectivity in relation to secondary schools/universities) and (b) (education capacity and provision). They suggested that wording should be added concerning layouts that minimise the use and impact of private motor vehicles and also welcomed how the policy mentions Oxfordshire County Council’s parking standards. They highlighted this means some

developments will need to incorporate at least elements of car-free provision in accordance with the stipulations of the parking standards.

The **Ministry of Defence** highlighted that the site lies within the RAF Weston on the Green bird strike safeguarding zone. They set out the type of development that would trigger the statutory safeguarding consultation requirement in this zone and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Historic England advised that a heritage impact assessment would support and inform the proposed allocation. They noted that the approach to the site's development and policy wording may evolve in light of the heritage impact assessment.

Natural England requested that further information be provided regarding the provision of green infrastructure and open space at this site given the close proximity of the allocation (and AS3 and AS4) to the edge of Oxford City and a number of SSSI located in this area such as Brasenose Wood & Shotover Hill SSSI, Lye Valley SSSI, New Marston Meadows SSSI, Iffley Meadows SSSI and Sydlings Copse & College Pond SSSI which could potentially experience an increase in visitor numbers and recreational disturbance from the resulting increase in population.

Thames Water highlighted that upgrades to water supply infrastructure networks are likely to be required. They stated the councils and developer should engage with Thames Water at the earliest opportunity to agree appropriate phasing. This catchment is subject to high infiltration of groundwater into the sewer network, the developer should liaise with the LLFA to agree an appropriate surface water strategy following the sequential approach before considering connection to the public sewer network.

National Highways requested early engagement in the development of this site.

How the main issues regarding Policy AS5 (general) have been taken into account

The councils remain committed to the inclusion of this site as a sustainable, high quality development option, close to the city/employment and transport links, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes. We acknowledge that many comments have recognised and supported these features. The indicative concept plan has been set out to sensitively take into account of all known site constraints.

The policy already refers to transport mitigation measures, including promoting non car modes of travel and layouts that minimize the use and impact of motor vehicles and measures to discourage car-dependent development.

Other key aspects of the policy, such as green infrastructure and flood risk, have been considered through evidence base documents and the policy reflects any updates related to the site.

The policy's location context regarding pedestrian and cycle links across the A40 have been carried across from South Oxfordshire Local Plan 2035 Policy STRAT13. Some references to other policies that are in STRAT13 and its supporting text have been removed from Policy AS5, as planning applications should adhere to policies throughout the plan.

Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

Policy LS1 (Proposals for Large Scale Major Development) highlights that development proposals be supported by relevant technical studies and supporting documents, such as a site-specific flood risk assessment which takes into consideration the findings and recommendations of the Strategic Flood Risk Assessment and an integrated water management plan to include proposed foul and surface water drainage strategies, incorporating a sewage capacity assessment.

As a new heritage asset has been designated within the area of the site allocation, an addendum to the 2019 South Oxfordshire Heritage Impact Assessment (which includes Land North of Bayswater Brook) was commissioned and published alongside the Regulation 19 publication version.

Other more technical issues raised and requests for detailed assessments will be addressed through the planning application process; and the councils will continue with our ongoing engagement with statutory consultees.

(Regarding Sandhills, please see the separate comment summary and response, regarding the proposal not to retain the Sandhills portion of the original site allocation).

Policy changes include:

- The policy wording has been amended regarding education facilities, capacity and provision to ensure clarity within the criterion regarding these.
- The policy has also been amended in light of the latest evidence available – such as including details on requirements for housing with care for older people and the utilisation of the Infrastructure Delivery Plan to inform infrastructure requirements (including for education, transport and healthcare).
- The policy wording has been updated, asking proposals to meet the biodiversity net gain requirement through a Biodiversity Gain Plan that maximises the delivery of onsite biodiversity, including the protection and enhancement of habitats along Bayswater Brook, new habitats to the north buffering the Sydlings Copse and College Pond SSSI and off-site biodiversity enhancements.

Full Survey: Summary of main issues raised regarding Policy AS5 (proposal to not retain Sandhills)

- A number of comments supported the proposal not to retain the Sandhills parcel as part of the Land at Bayswater Brook site allocation. Reasons given included:
 - a wish to retain Green Belt land/restore the whole parcel as Green Belt;
 - proposed access concerns, current access issues and issues for bridleway users;
 - concern regarding the removal of green space in general;
 - the proposal being a fair compromise.
- A number of comments highlighted that the whole site allocation, not just the Sandhills portion, should be removed as a strategic development site. Reasons given included:
 - transport infrastructure concerns – including traffic/safety concerns;
 - current flooding and water run-off concerns – with a number of concerns regarding potentially increased flooding with further development;
 - comments that the site is not viable;
 - negative impact of potential development on SSSIs and biodiversity/wildlife/habitats (e.g. Barbestelle bats, trees, fens);
 - further requests to restore the Green Belt;
 - disagreement with taking on Oxford City's unmet need.
- Some comments from developers stated a preference to retain the Sandhills part of the allocation. Reasons given included:
 - disputing reasons cited for removing the Sandhills parcel – that the road network can support anticipated traffic and the approach to deallocate is contrary to the NPPF;
 - that the county council are incorrect to allege that a bridleway cannot be diverted where the landowner is not known; that bridleways can be stopped up/diverted under section 257 of the Town and Country Planning Act if competent authorities are satisfied that it is necessary to do so in order to enable development to be carried out; that a dedicated strip of land can enable a bridleway to be widened and therefore be usable. Section 257 does not require applicants for a stopping up/diversion order to be the owner of the land from which the bridleway is being diverted. Alternative access arrangements are not necessary because the proposed access points are deliverable. Highways capacity is not a valid/justified reason for asserting that the site is not achievable;
 - Oxford's unmet need is failing to be achieved/will not be achieved in the timescales envisaged and the districts are not meeting their housing needs - the main part of the Bayswater Brook allocation's application has not been determined in over a year;
 - the site/area has shown, via recent planning applications, that it is deliverable in the short term (i.e. application submitted), suitable and achievable, not subject to environmental constraints or complex infrastructure requirements and would provide sufficient help with the council's 5YHLS and is a sustainable/urban extension of Oxford;

- criticisms of the larger Bayswater Brook site (including its deliverability) stating that it will not allow the councils to achieve their spatial strategy and that it does not benefit from Oxford's infrastructure.
- local/district benefits – Sandhills contributing to housing need, affordable housing, elderly need (with multiple benefits highlighted to including a care home onsite, including delivery of needed facilities for older people), public transport/connectivity, delivery of open space, ecological benefits and economic benefits.
- Sandhills had the lowest/moderate impact on the Green Belt of the Bayswater Brook land parcels; that the Local Plan 2035 Inspector found the site allocation sound;
- lack of justification in the Strategic Environmental Assessment and Sustainability Appraisal for de-allocation – there was a suggestion that these were inaccurate and a request for them to be amended.

Oxfordshire County Council supported the 'suitability concern' text provided at page 290; and stated that if the councils decided not to de-allocate the Sandhills parcel (which would be against their advice) then a new separate allocation and policy would need to be written. Regarding the proposed deallocation of Sandhills parcel, they confirmed this was consistent with their advice and highlighted it was not necessary to develop the parcel to meet housing needs. Consequently, they said the JLP should consider a proposal to return the site to the Green Belt.

How the main issues regarding Policy AS5 (proposal to not retain Sandhills) have been taken into account

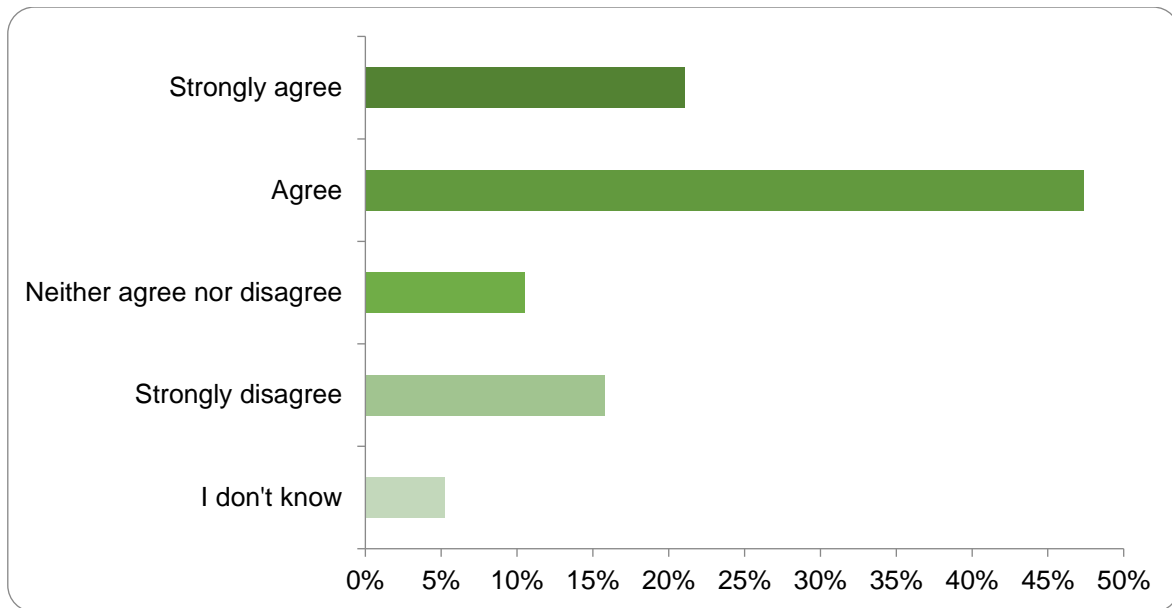
The councils will not retain the Sandhills parcel as part of the Land at Bayswater Brook site allocation. The Sandhills parcel, though removed as a site allocation, remains inset from the Green Belt.

The councils remain committed to the inclusion of Land at Bayswater Brook (that does not include the Sandhills parcel) as a sustainable, high quality development option, close to the city/employment and transport links, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes.

(Also see the response to Policy AS5's overall comments regarding the site allocation for Land at Bayswater Brook).

Policy AS6 – Rich's Sidings and Broadway, Didcot

Nutshell (Section 13): How far do you agree or disagree with tweaking the Orchard Centre Phase 2 site allocation? (to reduce the site area to exclude the Orchard Centre, rename to "Rich's Sidings and Broadway", and fewer homes)



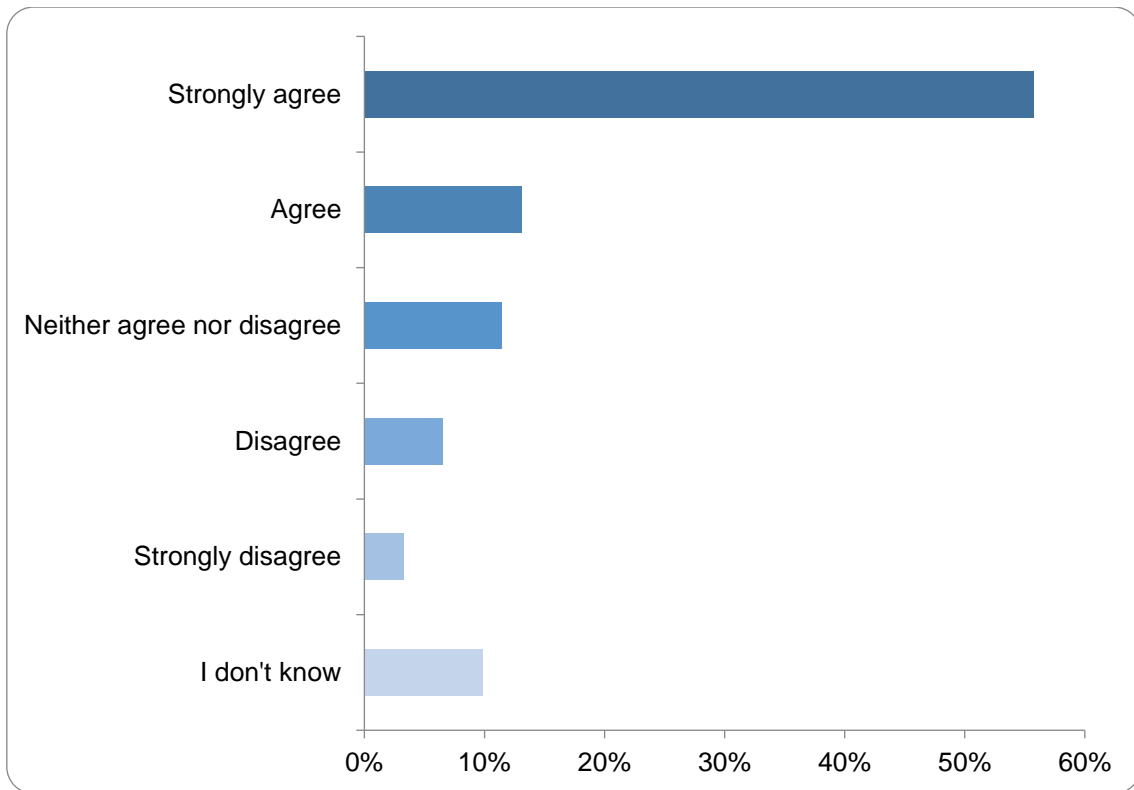
Of the 19 people who responded to this question, 68% of people either agreed or strongly agreed with tweaking the Orchard Centre Phase 2 site allocation to reduce the site area to exclude the Orchard Centre, rename to “Rich’s Sidings and Broadway”, and allocate fewer homes. Nobody selected disagree. 663 people did not answer.

Nutshell (Section 13): Other comments on Rich’s Sidings and Broadway, Didcot

11 people answered this question.

Respondents felt development in this area needs to consider design, which should be improved based on existing developments. It should be linked to the Orchard Centre and include a mix of uses, such as employment and shops – with concern raised about shops closing down. Respondents also felt that there was a need or an indoor leisure facility in Didcot, alongside soft play facilities and more parks. Respondent raised concern about the inclusion of more housing and fast food outlets, and the lack of parking. Traffic was a key issue for Didcot, with respondents feeling more infrastructure is needed alongside any new development. There was a mix of support for regenerating the site and expanding the area, and opposition to increasing the site and changing from the original plan.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 61 people who responded to this question, 69% either agreed or strongly agreed with the proposed draft policy wording. 529 people did not answer.

Full Survey: Summary of main issues raised

Site allocation - overall

- There was overall support for this policy, noting that it proposes an extension to existing development, at a town centre site within a sustainable settlement with good connections and facilities.
- There were conflicting viewpoints on the appropriate housing allocation. Some felt the policy should revert to the original allocation of 300 houses, and some felt new houses on the site are unnecessary given the allocation of housing elsewhere in Didcot, and some felt the number proposed in the policy is appropriate.
- One site promoter commented that Rich's Sidings and Broadway have been allocated since the 2011 Local Plan yet the housing allocation has not yet been delivered.

Other comments:

- Some respondents commented on the mix of uses on the site, noting that there are currently several mostly independent local businesses which should remain. The landowners of Rich's Sidings and Broadway welcomed the reallocation as mixed-use development, and suggested that the uses permitted on site is broadened to include Use Class C1-C2 (hotels and residential institutions) and Class E (commercial, business and service).

- There were conflicting views regarding retail uses on site, with one respondent requesting further retail provision whilst another commented that this is not necessary as there is adequate retail provision at the Orchard Centre and Broadway.
- One respondent felt that the policy should not include support for main town centre uses, and the site should be excluded from the Didcot town centre boundary.
- There was a request for a leisure centre and doctor's surgery on site.
- There were calls for phasing of development on site, allowing for partial regeneration as land becomes available. Thames Water also requested phasing to allow for necessary upgrades to water supply infrastructure networks.
- There was a request that stakeholders are included in discussions before master plans are created.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land, and biodiversity and fisheries. They stated that development at this site will increase flows to Didcot sewage treatment works. They raised concerns about infrastructure capacity and water quality related to Didcot Sewage Treatment Works which need to be explored through the Water Cycle Study.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height and bird strike safeguarding zones. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones, and recommended that the policy indicates that development should have no impact on the operation or capability of defence sites or assets.

Historic England noted that the site is close to Didcot Northbourne conservation area and recommended reference to this conservation area in policy and supporting text. They noted that this conservation area does not currently have an appraisal, and recommended that this is included in the evidence base to inform this proposed development.

Oxfordshire County Council conveyed the importance of a comprehensive policy for this site given that it is a new policy with no carried over policy provisions. In particular it should include guidance on the form of development and infrastructure expected.

How the main issues have been taken into account

The councils note the overall support for the policy for the Rich's Sidings and Broadway site, and that the majority of respondents felt the housing allocation and mix of uses proposed is appropriate. We remain committed to the inclusion of this site as a reasonable and sustainable option as it will deliver regeneration in a key location in Didcot, ensuring long term benefits for existing and future residents of the Town.

The Town Centres and Retail Study concludes that the previously defined Didcot town centre boundary, which includes this site, remains largely appropriate (subject to minor amendment to exclude the allotments on Broadway). We do not therefore need to make any changes to the proposed retail uses on site, as Policy AS6 allocates the site for a mixed-use development comprising new jobs and approximately 100 homes. These uses are compatible with a town centre location, so we do not agree that the town centre boundary needs amending to exclude this site.

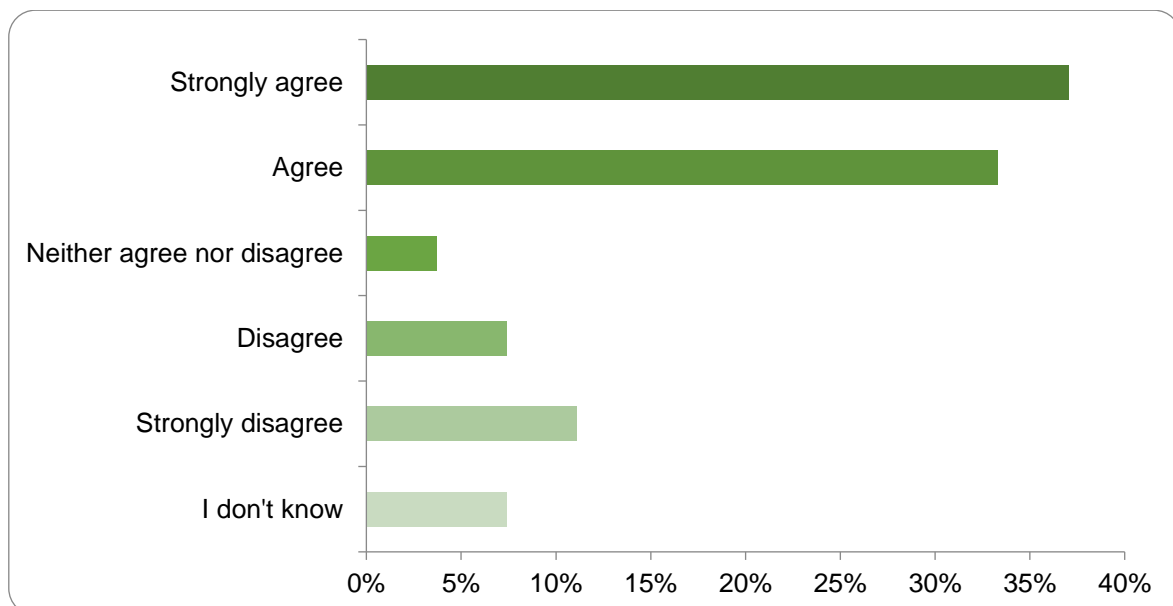
We do not need to set out any further protections for the operation of RAF Benson as these are covered in The Town and Country Planning (safeguarded aerodromes, technical sites, and military explosives storage areas) Direction 2002.

Policy changes include:

- Amendments have been made to the policy text to include reference to the requirements for Large Scale Major Developments as set out in Policy LS1. This will ensure that the applicant considers an appropriate use mix, the regeneration opportunities, and amenity provision as raised by respondents.
- There is an additional requirement for the applicant to assess and implement mitigation measures for Didcot Sewage Treatment Works.
- There is an additional requirement for the applicant to assess and implement mitigation measures on the nearby Didcot Northbourne Conservation area.
- There is additional detail within the policy and supporting text regarding the form of development and infrastructure we expect on this site.

Policy AS7 – Didcot Gateway, Didcot

Nutshell (Section 13): How far do you agree or disagree with tweaking (fewer homes) the Didcot Gateway site allocation?



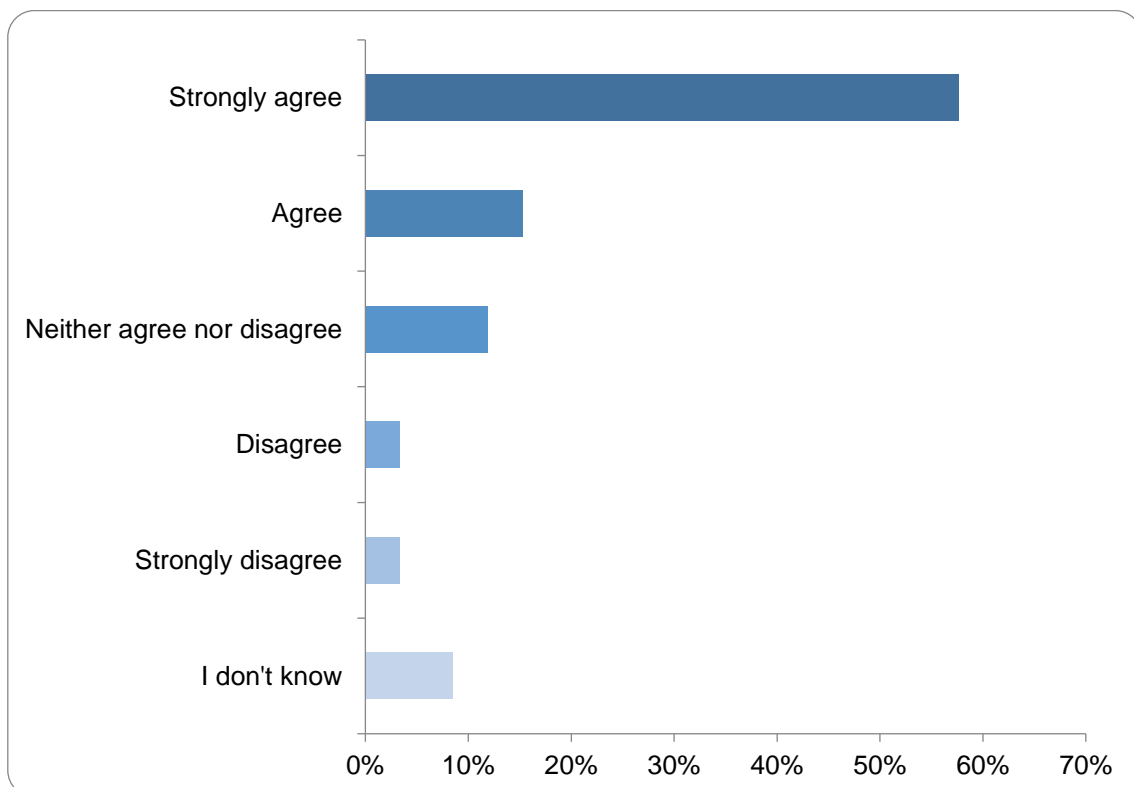
Of the 27 people who responded to this question, 70% of people either agreed or strongly agreed with tweaking (fewer homes) the Didcot Gateway site allocation. 655 people did not answer.

Nutshell (Section 13): Other comments on Didcot Gateway

21 people answered this question.

The main issue raised by respondents in response to this question was the lack of infrastructure (including healthcare) in Didcot. Respondents felt that Didcot is already overwhelmed, and infrastructure needs improving before more development happens. Respondents did support a reduction in housing numbers at the Didcot Gateway site, although a couple of responses suggested there should be no homes in this location, with others suggesting the original allocation should be retained and the site should be developed for housing only. Some respondents objected to the new council offices proposed in this location. Other concerns raised were regarding the lack of parking where cars should still be planned for, the impact on the road network, which was felt to have insufficient capacity at present, and the potential increase to flood risk in the area. A number of respondents highlighted the need to improve design based on existing developments.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 59 people who responded to this question, 73% either agreed or strongly agreed with the proposed draft policy wording. 531 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- There was overall support of the policy and allocation, noting that it relates to Didcot Garden Town, within a town centre location and within a sustainable settlement with good connections and facilities.
- There were concerns that despite the proposed reduction in housing numbers since the policy was last allocated, the proposed amount would still constitute inappropriately dense development. One respondent noted that the proposed council offices would reduce the amount of land available, so the development would remain dense despite the reduction in proposed housing number. Furthermore, there was a concern about the height of buildings proposed at the site.
- Conversely, some respondents felt that the reduction to 200 houses was sensible, and that flats next to a station were an appropriate development. This included a suggestion to make the development feel like an extension to the high street with cafes and shops.

Infrastructure:

- Some respondents raised traffic concerns. One was regarding the impact of the proposed houses on traffic given the current congestion on Station Road. Another respondent suggested making Lydalls Road two way to ease congestion.
- A transport operator stated that capacity is constrained at the bus station opposite the site. They requested that the policy includes a requirement for improved bus interchange facilities.

Other comments:

- One respondent contended that the reference to “mixed use development” on this site should not include support for main town centre uses, which should be directed to Didcot town centre.
- A respondent recommended that the policy should only allow regeneration to happen once land becomes available, so that existing businesses are not forced to relocate.
- There was a request that stakeholders are included in discussions before master plans are created.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height and bird strike safeguarding zones. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones, and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxfordshire County Council conveyed the importance of a comprehensive policy for this site given that it is a new policy with no carried over policy provisions. In particular it should include guidance on the form of development and infrastructure expected.

Homes England, who own land at Didcot Gateway which forms part of the allocated site, stated support for the continued allocation of Didcot Gateway and the amended capacity to 200 houses, which is reflective of the Didcot Gateway Masterplan and an accurate representation of the capacity given the inclusion of new offices for the Councils. An outline planning application for the redevelopment of land owned by Homes England was submitted in 2022. Homes England noted that the outline application for 144 houses has no outstanding objections for statutory consultees, demonstrating that the site is available for development, suitable for development and achievable.

National Highways requested early engagement in development of this site.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, and groundwater and contaminated land. They stated that development at this site will increase flows to Didcot sewage treatment works. They have significant concerns about infrastructure capacity and water quality related to Didcot sewage treatment works which need to be explored through the Water Cycle Study.

Thames Water requested phasing to allow for necessary upgrades to water supply infrastructure networks.

How the main issues have been taken into account

We note the overall support for the policy relating to the Didcot Gateway site, and that the majority of respondents felt the housing allocation, development density and mix of uses proposed is appropriate. The councils remain committed to the inclusion of this site as a reasonable and sustainable option as it will deliver regeneration in a key location in Didcot, ensuring long term benefits for existing and future residents of the Town.

There are concerns regarding traffic impacts in this area, and we have updated the policy to include a comprehensive list of transport mitigation measures required for the development.

Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

We do not need to set out any further protections for the operation of RAF Benson as these are covered in The Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002.

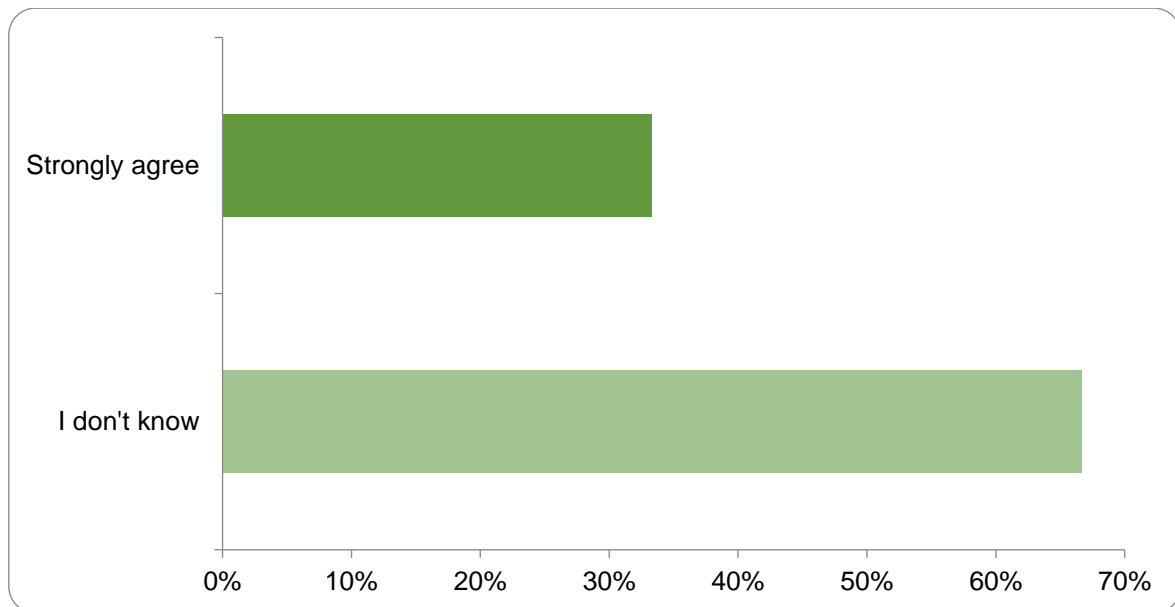
Policy changes include:

- Amendments have been made to the policy text to include reference to the requirements for Large Scale Major Developments as set out in Policy LS1. This will ensure that the applicant considers an appropriate use mix, the regeneration opportunities, and amenity provision as raised by respondents.

- There is an additional requirement for the applicant to assess and implement mitigation measures for Didcot Sewage Treatment Works.
- There is an additional requirement for the applicant to assess and implement mitigation measures on the nearby Didcot Old Conservation area.
- There is additional detail within the policy and supporting text regarding the form of development and infrastructure we expect on this site.

Policy AS8 – North West of Grove, Grove

Nutshell (Section 13): How far do you agree or disagree with tweaking (higher number of homes to cover the new plan period, but no extra overall) the North West Grove site allocation?



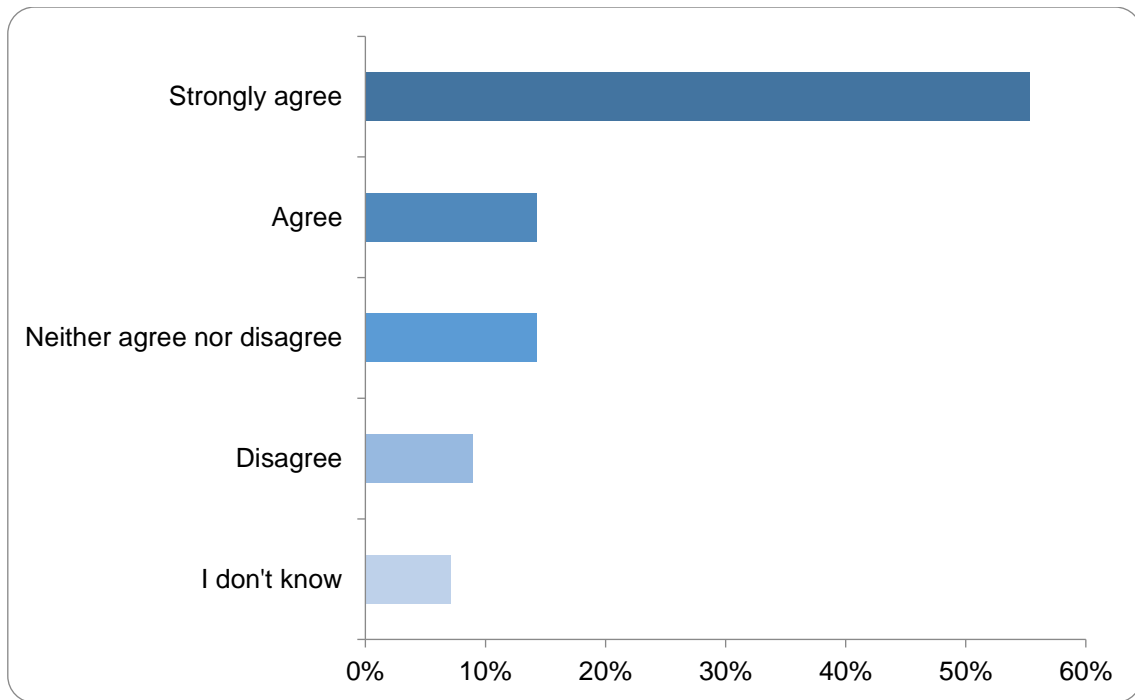
Of the 3 people who responded to this question, 33% of people strongly agreed with tweaking (higher number of homes to cover the new plan period, but no extra overall) the North West Grove site allocation. Nobody selected agree, neither agree nor disagree, disagree or strongly disagree. 679 people did not answer.

Nutshell (Section 13): Other comments on North West of Grove

2 people answered this question.

One respondent expressed some concerns about the amount of development around Grove, Didcot and Culham and supported a reduction in homes. Another recognised the role of this site allocation in the delivery of the Grove Northern Link Road.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 56 people who responded to this question, 69% either agreed or strongly agreed with the proposed draft policy wording. 534 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- Some respondents raised concerns about overdevelopment of Grove, while others supported the location of the allocation in relation to the settlement.
- Some respondents sought clarity on how many homes would be delivered within the plan period.
- Some respondents were concerned about the increase from 400 to 600 homes in the policy, and had concerns about the impact on environmental factors and healthcare facilities.
- The site promoters supported allocating the full capacity of the site, and requested several detailed edits to the policy wording.

Infrastructure:

- Some respondents suggested the site is poorly connected, and would benefit from better walking and cycling routes, as well as road improvements to cross the railway line.

Other comments:

- Some respondents suggested the site should retain any trees and landscape features currently on site and seek to improve biodiversity.

Oxfordshire County Council supported the intention to allocate for the full capacity of the site and suggested several policy wording amendments in relation to education, archaeology, public transport, and water infrastructure. Their position

regarding bus services and additional primary school remains the same as in their response to planning application P20/V3113/O.

National Highways requested early engagement in development of this site.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land. They have concerns about infrastructure capacity and water quality related to Didcot sewage treatment works which need to be explored through the Water Cycle Study.

Network Rail commented that the policy should consider the stopping up or diversion of the footpath level crossings to avoid safety concerns.

Thames Water commented that upgrades to water supply and wastewater infrastructure networks are likely to be required. The councils and developer should engage with Thames Water at the earliest opportunity to agree appropriate phasing.

How the main issues have been taken into account

The councils remain committed to the inclusion of this site as a sustainable, high quality development option, close to employment and transport links, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes.

This policy has generally been updated taking into account the issues raised and further evidence received since it was published.

Other aspects, such as green infrastructure, the impact on the landscape, and flooding on the site, have been considered through evidence base documents and the policy reflects any updates related to the site .

Issues raised about the railway line have been addressed through the Infrastructure Development Plan. Other more technical issues raised and requests for detailed assessments will be addressed through the planning application process.

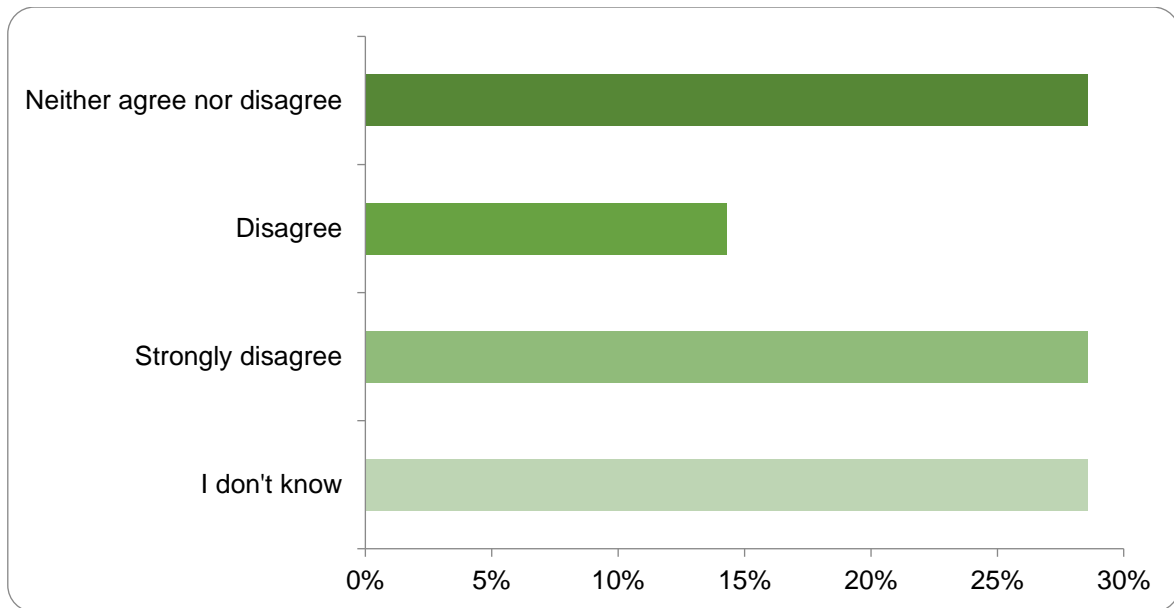
Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

Policy changes include:

- The policy has been amended to require biodiversity net gain and improved connectivity.
- The supporting text has clarified that it is expected the site will be fully built out during the plan period.

Policy AS9 – North West of Valley Park, Didcot

Nutshell (Section 13): How far do you agree or disagree with tweaking (minor changes) the North West Valley Park site allocation?



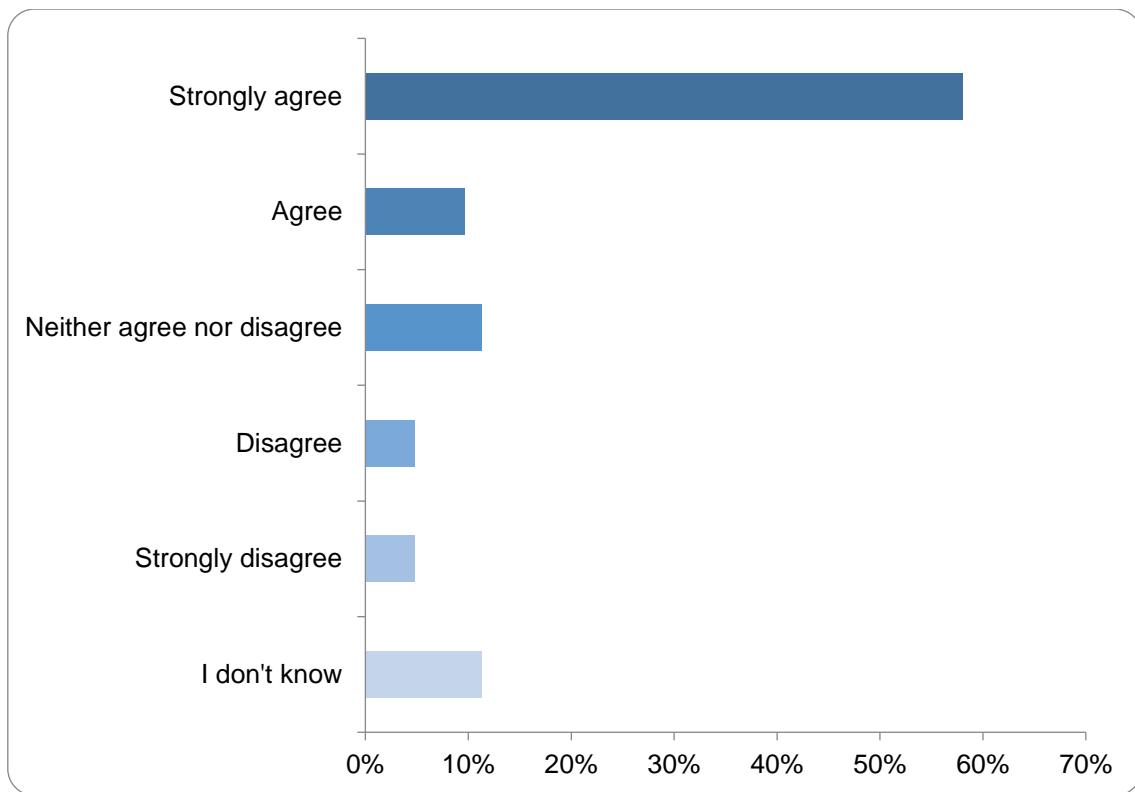
Of the 7 people who responded to this question, 43% either disagreed or strongly disagreed with tweaking (minor changes) the North West Valley Park site allocation. Nobody selected agree or strongly agree. 675 people did not answer.

Nutshell (Section 13): Other comments on North West Valley Park

6 people answered this question.

The majority of respondents did not support development of this site due to insufficient infrastructure and local public transport. Environmental impact of development was raised as a concern. Respondents felt Didcot required healthcare services, and indoor leisure and soft play facilities.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 62 people who responded to this question, 68% either agreed or strongly agreed with the proposed draft policy wording. 528 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- There are concerns about the long lead-in time for large sites. It was suggested that the plan be supported by additional, smaller sites that would help deliver housing in the early part of the Plan period.
- There was a proposal to change the land use to retail, due to the location (A34), subject to traffic modelling.

Infrastructure

- There were suggestions that this development would increase the pressure on current infrastructure, in particularly education, health services and road infrastructure (A34 and associated A4130).

Other comments:

- Concern was raised about the provision for private motor vehicles. Respondents mentioned that it is hard to cycle around Didcot, especially in the winter.
- Some concerns were raised about the flood plain and the recent flooding in Didcot.
- There were suggestions that this policy includes mitigation of air pollution and noise during infrastructure improvements.

- Some suggested this policy include a requirement for developers to complete the Ancient Tree Inventory (ATI) across the site, in order to comply with the requirements of the NPPF for the protection of irreplaceable habitats.
- There was a suggestion for this policy to designate and implement suitable buffer zones where development is adjacent to ancient woodland.
- There was also a suggestion that this policy includes a requirement for essential community engagement with major stakeholders before submitting a detailed masterplan.

Oxford Bus Company suggested that operational synergies are required for bus services between this site and GWP, as services are brought south of the railway line and away from the Park Drive corridor. Bus stops on the A4130 are likely to be required in the short term until the development is fully constructed.

Sport England agreed with Parts (h) and (i) which are evidenced by the emerging Leisure Facilities Assessment and Strategy and Playing Pitch Strategy.

Thames Water suggested that upgrades to water supply and wastewater infrastructure networks are likely to be required. They stated the councils and developer should engage with Thames Water at the earliest opportunity to agree appropriate housing and infrastructure phasing.

National Highways requested further engagement in the development of this site with the councils.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land, and biodiversity and fisheries. They stated that development at this site will increase flows to Oxford sewage treatment works. They had significant concerns about infrastructure capacity and water quality related to the Oxford sewage treatment works which need to be explored through the Water Cycle Study. They also welcomed Part (m) of the policy. They stated that the impacts of climate change should also be considered, as part of Flood Zone 1 (FZ1) may be at a higher flood risk during the lifetime of the development.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height safeguarding zone. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones, and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxfordshire County Council submitted detailed comments in relation to the requirements of education, archaeology and transport development. They highlighted the importance of archaeological mitigation, as archaeological evaluation has recorded a range of archaeological deposits across the site dating from the Neolithic through to the Roman period.

How the main issues have been taken into account

The councils note the mixed response to this allocation and remain committed to the inclusion of this site as a sustainable, high-quality development, close to employment and transport links in a sustainable location, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes. The indicative concept plan has been set out to sensitively take into account all known site constraints identified through our supporting evidence.

The policy includes additional requirements on biodiversity net gain, development density, pitches for gypsies and travellers, and the provision of older people’s housing.

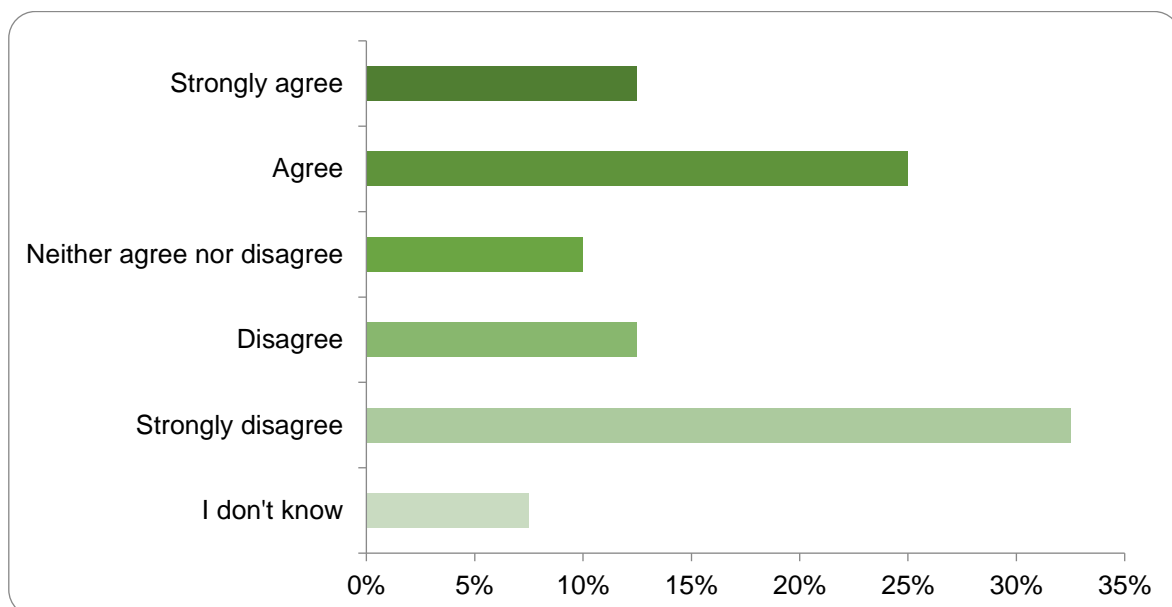
The updated Infrastructure Delivery Plan (IDP) contains a detailed plan for this site’s infrastructure delivery, addressing concerns about current infrastructure capacity. Since the Joint Local Plan (JLP) already includes policies on matters such as community engagement, pollution mitigation and water infrastructure requirements, this policy avoids cross-referencing them to prevent duplication.

Policy changes include:

- The policy has been amended to address concerns about recent flooding in Didcot and the area's water infrastructure.
- An additional requirement has been introduced for developers to assess potential noise impacts from the existing railway line and propose mitigation measures.

Policy AS10 – Land at Dalton Barracks Garden Village, Shippon

Nutshell (Section 13): How far do you agree or disagree with tweaking (extend the site area and increasing the number of homes) the Dalton Barracks site allocation?



Of the 40 people who responded to this question, 38% of people either agreed or strongly agreed with tweaking (extend the site area and increasing the number of homes) the Dalton Barracks site allocation. 642 people did not answer.

Nutshell (Section 13): Other comments on Dalton Barracks

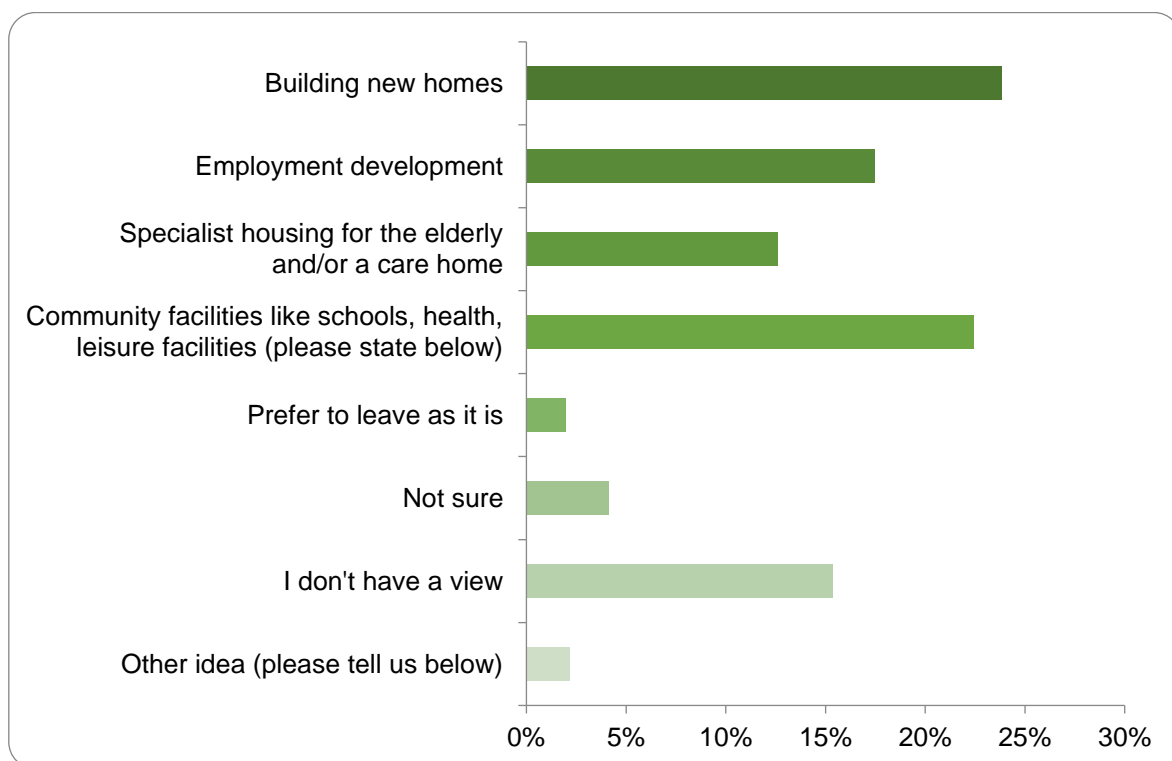
36 people answered this question.

Many respondents raised concern about the increase in traffic from this allocation, which will increase pressure on existing infrastructure. Other local facilities would also come under increased pressure from the development. Infrastructure would need to be delivered up front. Respondents felt that public transport and active travel should be improved to support any development on the site.

There were mixed views on the level of development, with some respondents feeling that there are too many homes proposed when Abingdon has already been development too much – with over development potentially having a negative impact on the Green Belt and local environment. Meanwhile, other respondents felt the site was a brownfield location that could be used (and extended as a larger development) to deliver increased housing numbers, particularly where they meet Oxford’s unmet need. Respondents felt that the site should accommodate a mix of housing and employment, and bring benefit to the existing community. Respondents thought that the housing mix and tenure should be considered, to deliver affordable housing to meet specific local needs, such as housing for older people. Other uses should include sufficient education, health and leisure facilities.

It should focus on Garden Village principles, reducing the reliance on cars and providing improved and important green spaces (such as an adequate buffer zone required to protect sensitive adjacent areas). Any development should be mindful of relevant local policy including the Neighbourhood Plan and SPD.

Nutshell (Section 14): What do you think are the best use(s) of the Dalton Barracks brownfield site?



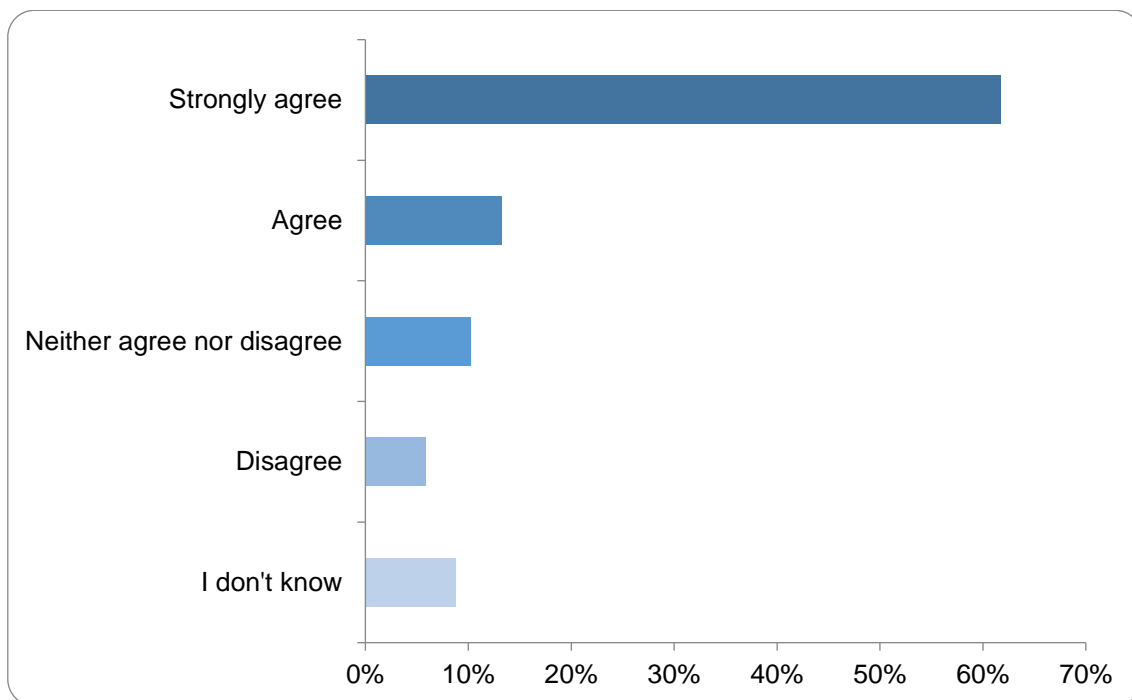
Of the 559 people who responded to this question, 24% thought the best use of the Dalton Barracks brownfield site was for building new homes. 22% thought the best use was for community facilities. 17% thought it was for employment development and 15% did not have a view. 123 people did not answer.

Nutshell (Section 14): This brownfield site is likely to see change over the next 15 years - what things would make this a great place? You could tell us for example your suggestions for the mix of uses, the layout, space for nature, or the types of community and transport facilities needed for this site?

118 people answered this question.

The most common responses to this question were the desire for more healthcare facilities alongside a mix of uses provided on site. Respondents also thought community facilities should be provided, particularly due to their benefit on the local area. In addition, respondents raised the desire to see green and recreational spaces, leisure facilities, schools, shops, employment and services, improved transport (including cycle links), specialist and elderly housing and affordable housing. Respondents felt that infrastructure should be provided first. There was support for redeveloping a brownfield site, and some respondents highlighted the need to prioritise the natural environment, nature recovery and biodiversity.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 68 people who responded to this question, 75% either agreed or strongly agreed with the proposed draft policy wording. 522 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- There was support for the allocation overall and also support for the extension of the existing allocation to provide further employment, infrastructure and healthcare.
- Some questioned whether the allocation represents sustainable development, given its location adjacent to a Tier 4 settlement, as this conflicts with the settlement hierarchy. There was also a query how the additional growth proposed for the allocation was selected because it is close to a SAC and located in the Oxfordshire Green Belt, so 'exceptional circumstances' would need to be demonstrated.
- There were some concerns that the site will not be delivered until late in the plan period; and some queries whether the site would definitely be released for development.
- Some comments suggested the quantum of development during the Plan period was unclear – e.g. would the 2750 dwellings be delivered within or beyond the Plan-period; and some queried delivery by 2041.

Infrastructure:

- There were some suggestions to provide additional public transport in the area. These included enhancement suggestions about the connectivity of the allocation, density in relation to bus accessibility, bus priority and bus service suggestions and phasing ideas.
- Some comments expressed concerns that the site is poorly connected and would require significant infrastructure improvements; and there was a comment that no transport assessment had been provided for the proposal, nor the draft Joint Local Plan.

Other comments:

- A town council requested a clear definition of 'green belt-compatible development' and suggested additional policy wording regarding health care capacity and affordable housing provision.
- Alternative policy wording was also suggested, should HIF1 not progress.
- There was a request for further information regarding sites and their housing provision to be laid out in the Regulation 19 Joint Local Plan.
- There was also support for green infrastructure and protecting the nearby SSSIs. However, there were concerns (including from a wildlife trust) about this allocation's proximity to a number of SSSIs, as well as a SAC. Similarly, there was a suggestion that the policy should ensure development does not encroach on these sites; and comments that the policy could do more to protect lowland fen habitat, highlighting fens' unique features and vulnerability to water quality/quantity changes.
- A wildlife trust suggested that the policy should seek exemplary delivery of biodiversity (25% biodiversity net gain) and seek management of the Dry Sandford Pit SSSI as a nature reserve.
- The site promoter supported the policy and the allocation being a sustainable new garden community. They also made the following comments:

- They suggested the policy should be recast to reflect the site's full potential – i.e. that the capacity of the site could include a further 2,500 residential units. They expressed preference for the remainder of the Dalton Barracks site to be removed from the Green Belt and allocated or safeguarded for further residential and employment-generating development, considering that there are sufficient exceptional circumstances to justify the amendment to the Green Belt boundary.
- They suggested the requirement to provide Suitable Alternative Natural Greenspace (SANG) was unnecessary, as the planned open space, areas for biodiversity enhancement, nature recovery and new landscaped open space would adequately address the requirements.
- They commented that the currently proposed location of the Green Belt reinforcement is not in the best interests of long-term strategic planning, nor provision of site-wide infrastructure, as it would create a physical barrier to comprehensive masterplanning of the site. They stated it was important to positively plan for the redevelopment of the entire site now. They therefore suggested that the councils further extend the allocation to include the airfield area to the west and north of the currently proposed site.
- They set out suggested policy wording amendments to reflect these points.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land, and biodiversity and fisheries. They raised some concerns about infrastructure capacity and water quality related to Appleton sewage treatment works and Abingdon sewage treatment works, and to land contamination, which need to be explored through the Water Cycle Study.

Historic England objected to the policy as currently drafted as they felt that a heritage impact assessment should be used to inform the approach to the larger allocation and that firmer requirements must be embedded in the policy. They welcomed Part (f), acknowledging the need to retain existing buildings and monuments “where possible”, but were concerned by the lack of firm requirements to retain non-designated heritage assets and conserve or enhance the setting of heritage assets.

Oxfordshire County Council made detailed comments about the wording of the policy, particularly for requirements related to education, transport and infrastructure, but generally supported the site allocation. However, they stated there should be a requirement for employment uses on site in line with Garden Village principles and to reduce the need for travel.

Natural England said they would welcome further discussion regarding the proposed green infrastructure and country park provision at the site in order to mitigate any impacts from an increase in recreational disturbance at the SAC. They asked for further information in relation to potential hydrological/recreational impacts of the development on SSSI located in close proximity to the development site and

welcomed further consultation/discussion re the screening approach to hydrological impacts on Cothill Fen.

Thames Water highlighted that upgrades to water supply and wastewater infrastructure networks are likely to be required. They stated that the councils and developer should engage with Thames Water at the earliest opportunity to agree appropriate phasing.

National Highways requested early engagement in the development of this site regarding a number of elements, including accesses (such as onto the A34), footbridges, bus priorities measures and its deliverability.

How the main issues have been taken into account

The councils remain committed to the inclusion of this site as a sustainable, exemplar high quality garden village, bringing with it the opportunity to provide new services and facilities and to maximise trips via non-car modes. We acknowledge that many comments have recognised and supported these features. The indicative concept plan has been set out to sensitively take into account all known site constraints.

The policy already refers to transport mitigation measures, including promoting non car modes of travel and layouts that minimize the use and impact of motor vehicles and measures to discourage car-dependent development.

Other key aspects of the policy, such as green infrastructure and flood risk, have been considered through evidence base documents and the policy reflects any updates related to the site.

Please see Policy HOU2 for the councils' response to queries regarding housing supply and housing delivery rates.

Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

Policy LS1 (Proposals for Large Scale Major Development) highlights that development proposals be supported by relevant technical studies and supporting documents, such as Ecological Impact Assessments, Health Impact Assessments and Ecological and Landscape Management plans to manage habitats on site.

The policy states that proposals for development must demonstrate how they would meet the biodiversity net gain requirement through a draft Biodiversity Gain Plan that maximises delivery of on site biodiversity, as well as avoiding all direct and indirect impacts on the SAC/SSSIs; how recreational impacts on the SAC/SSSIs have been assessed and used to inform onsite mitigation through the provision of suitable alternative natural greenspace and how proposals must demonstrate that there are no adverse effects in relation to the water quality of the SAC/SSSIs/Local Wildlife Site.

We have commissioned evidence to support the plan, this includes an assessment of the fens' hydrological catchments and a Heritage Impact Assessment relevant to this site.

Other more technical issues raised and requests for detailed assessments will be addressed through the planning application process; and the councils will continue their ongoing engagement with statutory consultees.

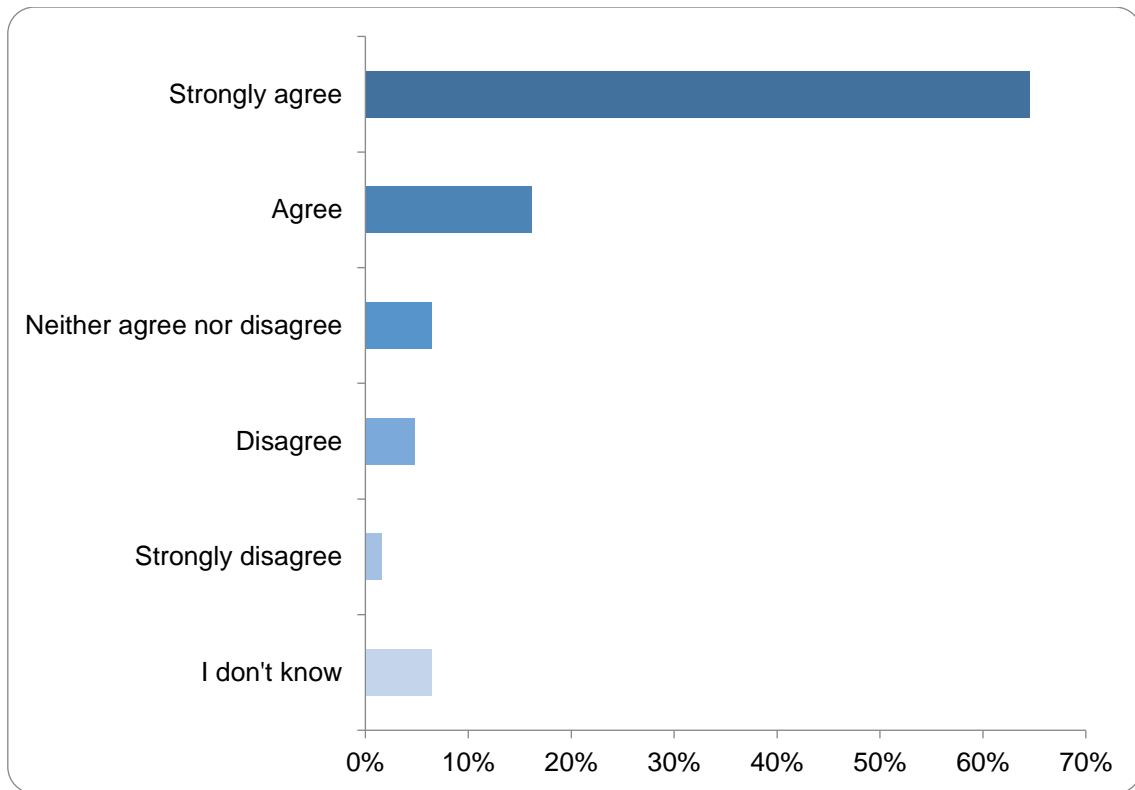
We do not consider there are exceptional circumstances to release land from the Green Belt through this plan.

Policy changes include:

- Amendments in light of the latest evidence available – such as including details on requirements for housing with care for older people, delivery of pitches for gypsies and travellers and the utilisation of the Infrastructure Delivery Plan to inform infrastructure requirements (including for education, transport, leisure and healthcare).
- Clarification of the active travel and public transport improvements and connections as well as clarification of transport mitigation measures.
- The Regulation 18 Part 2 draft policy previously required employment provision – this has now been quantified (to state opportunities for employment amounting to 7.4 hectares) via the Dalton Barracks Employment Assessment – part of the Joint Local Plan evidence base.
- The policy wording regarding biodiversity net gain (BNG) has been updated, asking proposals to meet the BNG requirement through a Biodiversity Gain Plan.
- The policy wording has also been updated to require that the design of connected green infrastructure for the site shall expand and bolster the Sandford Brook corridor and other priority habitats along the western edge; and to ensure there is at least a 10-metre wildlife buffer between the Sandford Brook and the development.

Policy AS11 – Culham Science Centre

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 62 people who responded to this question, 81% either agreed or strongly agreed with the proposed draft policy wording. 528 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- There was overall support for this policy. People responded that it was sensible to plan for homes near jobs, with some commenting that Culham Campus benefits from local employment and good transport links. There was acknowledgement of the importance of sustainable growth of the world-leading national science infrastructure at Culham Campus.
- However, there was some opposition to the policy, largely due to the neighbouring allocated site AS2 (Land adjacent to Culham Campus). Some argued that allocating employment at Culham Campus is unnecessary given increases in employment land elsewhere in the districts, for example Milton Park and Harwell Campus. There was a call for policy AS2 to be deallocated, with the displaced housing and employment land redistributed to the Culham No. 1 site and Culham Campus respectively.
- There were some comments regarding the masterplan for the site, the owners of the Campus suggested that the existing masterplan for the site is adequate and so an updated one is not required. One group called for discussion with local stakeholders before any future masterplan is created.

Infrastructure:

- Thames Water indicated that further detail is required to assess the impact of development on water supply and wastewater infrastructure.

Other comments:

- Some respondents highlighted the heritage significance of the nearby Nuneham House (Grade II* listed) and the estate's Grade I Registered Park and Garden and called for stronger protections for these heritage assets in the policy.
- One respondent recommended that rail links should be expanded to provide a regular journey to UKAEA at Culham.

The Ministry of Defence highlighted that the site lies within the RAF Benson height and bird strike safeguarding zones. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Historic England objected to the policy as currently drafted as the wording "mitigate as far as possible" provided insufficient reassurance about the approach to Grade I Nuneham Courtenay Registered Park and Garden. They proposed revised wording that would address their objection. They also recommended including proportionate detail about the Grade I Registered Park and Garden in the supporting text, informed by the evidence underpinning this allocation.

Oxfordshire County Council requested reference to pump-priming of new and improved bus services, provision of bus priority measures (where appropriate) and other bus infrastructure, and walking and cycling both on and off site, including routes identified in Oxfordshire County Council's Strategic Active Travel Network. They advised stipulating requirements for contributions towards and provision of safeguarded land for the HIF1 scheme; contributions towards Culham train station, public transport services, A4074 Golden Balls upgrade; and direct delivery of off-site walking and cycling improvements to Berinsfield and Abingdon. The County Council also highlighted the safeguarded waste site within the proposed allocation for waste arising from science and technology research at the campus and the adjacent Thames and Lower Thames Valley – Oxford to Cholsey Safeguarded Area.

How the main issues have been taken into account

The councils remain committed to the inclusion of this site as a sustainable, high-quality development, close to other strategic development.

The policy adequately recognises the key role of the Campus as an internationally important centre of science and research and support development at this site.

The drawing up of masterplans to set the design vision and spatial layout of a site is a requirement for all allocated sites in the JLP. In this respect, Culham Campus is not an exception and so the requirement for the masterplan should remain. The current masterplan must be re-framed in the context of the JLP. Doing so also ensures that consultation takes place with all key stakeholders as part of the masterplan development process. Having an agreed masterplan in place will ensure future growth contributes towards comprehensive development of the site and includes an

assessment of the transport, landscape and other impacts of development, across the whole campus.

The infrastructure requirements requested by Oxfordshire County Council have been incorporated into the policy text.

Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

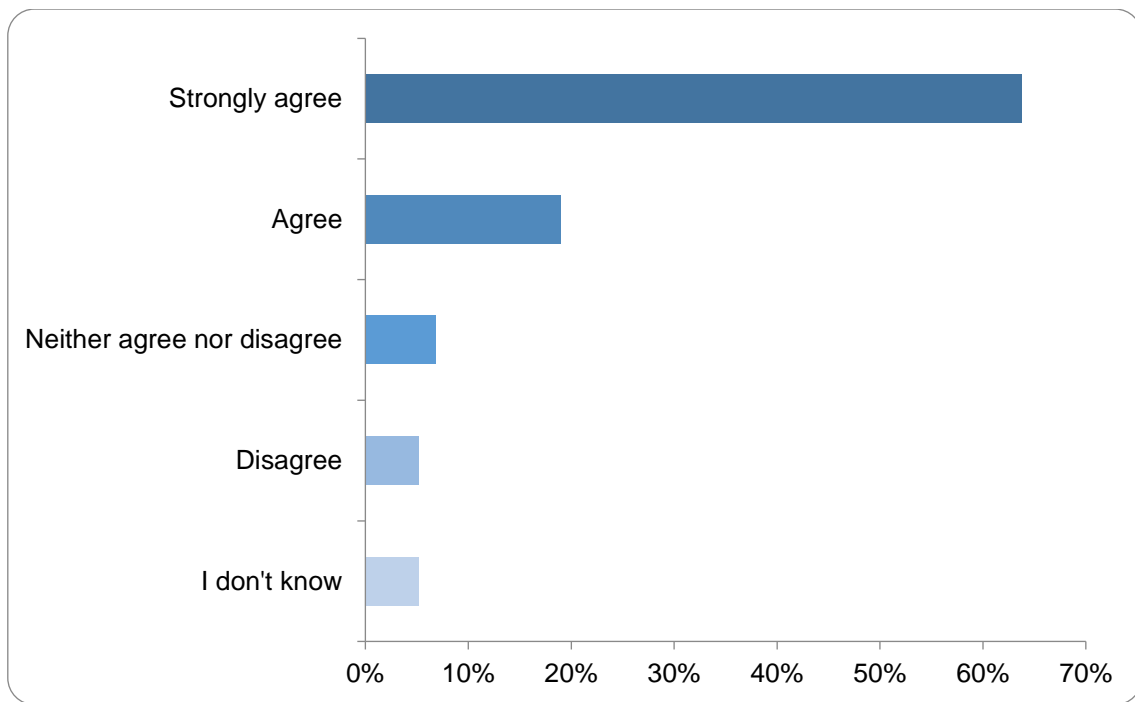
Other more technical issues raised and requests for detailed assessments will be addressed through the planning application process.

Policy changes include:

- All references to Culham Science Centre have been changed to Culham Campus to reflect its new title.
- Part 1(b) of the policy has been changed to 'ensures no significant adverse impact' to strengthen the protection of heritage assets. Further details regarding the significance of the surrounding countryside and heritage asset have been added to the policy and supporting text. Requirement to enhance or better reveal significance of heritage assets added to policy text.
- A requirement has been added in the policy for contributions towards Culham Station and other public transport and active travel initiatives.
- There is clarification regarding masterplan requirements in the policy and supporting text.

Policy AS12 – Harwell Campus

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 58 people who responded to this question, 83% either agreed or strongly agreed with the proposed draft policy wording. 532 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- There was overall support for this policy, people responded that it was sensible to plan for homes near jobs. There was acknowledgement of the importance of sustainable growth of the world-leading national science infrastructure at Harwell Campus.
- However, there was some opposition to the allocation on the grounds that Harwell Campus isn't in a sustainable location, being away from new housing and in a national landscape.
- There were some comments regarding the masterplan for the site, the owners of the Campus suggested that the existing masterplan for the site is adequate and so an updated one is not required. One group called for discussion with local stakeholders before any future masterplan is created.

Infrastructure:

- Thames Water indicated that further detail is required to assess the impact of development on water supply and wastewater infrastructure.
- A transport operator raised concerns about the impact of development on the strategic road network and potential queueing on the A34.

Other comments:

- Some respondents raised concerns over light pollution from the site, due to its sensitive location in a national landscape. The agents representing the

Campus felt a balance was needed as external lighting can be necessary for safety and security on site.

- A local environmental group suggested that as a high energy use site, the policy should include consideration of bringing forward proposals for renewable energy generation such as land-based solar, and that the policy should take account of unimproved grassland now rare in our district.
- One respondent questioned the methodology for calculating the area of land available for development in the policy, and called for greater clarity in this area. They raised concern that supply of land is more constrained than is assumed by the councils.

National Highways welcomed the requirement for masterplanning prior to determination and requested to be consulted during the masterplanning process. They highlighted that the masterplan will need to be informed by traffic modelling to consider impact on the A34.

The Environment Agency commented that the Didcot Sewage Treatment Works is at or over capacity and currently has no more headroom for growth. They stated that improvements are needed at the Sewage Treatment Works to accommodate the development proposed in the Joint Local Plan.

The Nuclear Decommissioning Authority and **Nuclear Restoration Services** highlighted the need to formally recognise the significant part the delicensing and land release plays in delivering up licensed nuclear site land for redevelopment. They proposed two amendments to policy, the first to reference the NDA and NRS, and the second to include wording on the management of radioactive waste in line with national strategies and policies.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height and bird strike safeguarding zones. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxfordshire County Council recommended amending the policy to allow WW2 remains to be assessed as heritage assets, namely heritage assets relating to the development of the airfield. They articulated the need for any future development at the campus to be subject to a comprehensive master plan and traffic modelling exercise. They called for investment into public transport and appropriate decide and provide transport assessments to support future development at this site. They asked for an Infrastructure Delivery Plan as per Culham Campus and a referenced the OCC Mineral and Waste Local Plan for management of the intermediate level radioactive waste produced in Oxfordshire at the Harwell nuclear licensed site.

How the main issues have been taken into account

The councils remain committed to the inclusion of this site as a sustainable, high-quality development, close to other strategic development.

Harwell Campus is a nationally and internationally significant centre for research and innovation and its continued development is crucial to both the success of the Oxford Economy and the national prospects for job growth associated with 'big science'.

The drawing up of masterplans to set the design vision and spatial layout of a site is a requirement for all allocated sites in the JLP. In this respect, Harwell Campus is not an exception and so the requirement should remain. Doing so also ensures that consultation takes place with all key stakeholders as part of the masterplan development process. Having an agreed masterplan in place will ensure future growth contributes towards comprehensive development of the site and includes an assessment of the transport, landscape and other impacts of development, across the whole campus.

We have added to the policy a requirement to ensure the management of radioactive waste and decommissioning processes at the Harwell Nuclear Licensed Site are in line with national strategies and policies. Further detail regarding the Harwell Nuclear Licensed Site and decommissioning process has been added to the supporting text.

Policy CE8 (Water Quality and Wastewater Infrastructure) addresses how development must not commence until all infrastructure upgrade plans have been agreed and programmed (between the developer and Thames Water/or other utility provider). In addition, it highlights that development must not be occupied until the necessary infrastructure upgrades have been completed.

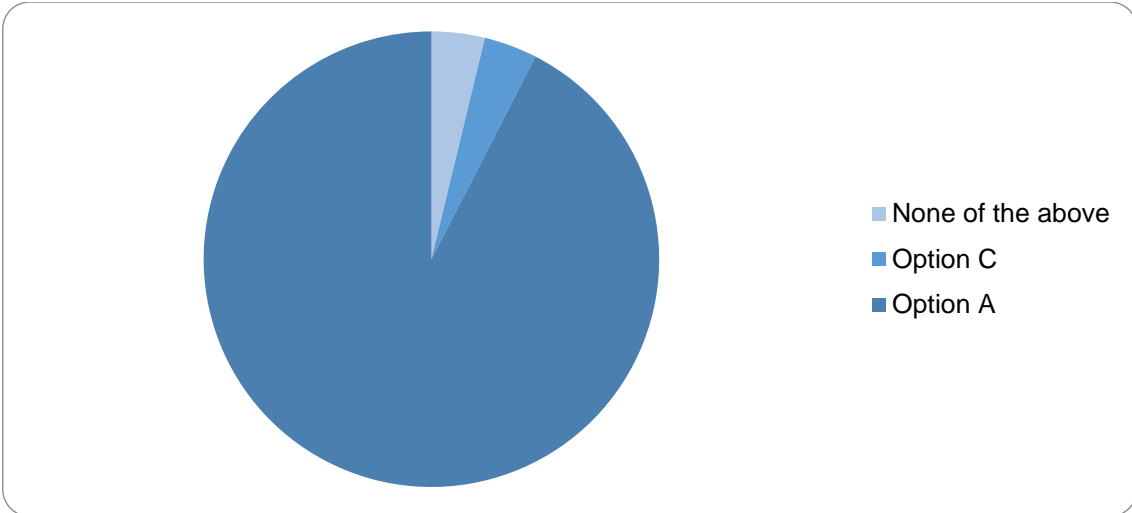
Other more technical issues raised and requests for detailed assessments will be addressed through the planning application process, but operator concerns about impact on the A34 included within our transport evidence base submitted with the Regulation 19 publication plan.

Changes made to policy

- It has been specified that an assessment and mitigation measures are required for the impact of development on the airfield as a heritage asset in the policy text.
- There is clarification regarding masterplan requirements in the policy and supporting text.
- There is guidance in the supporting text regarding the decommissioning of Nuclear Licensed land and its release for alternative use.

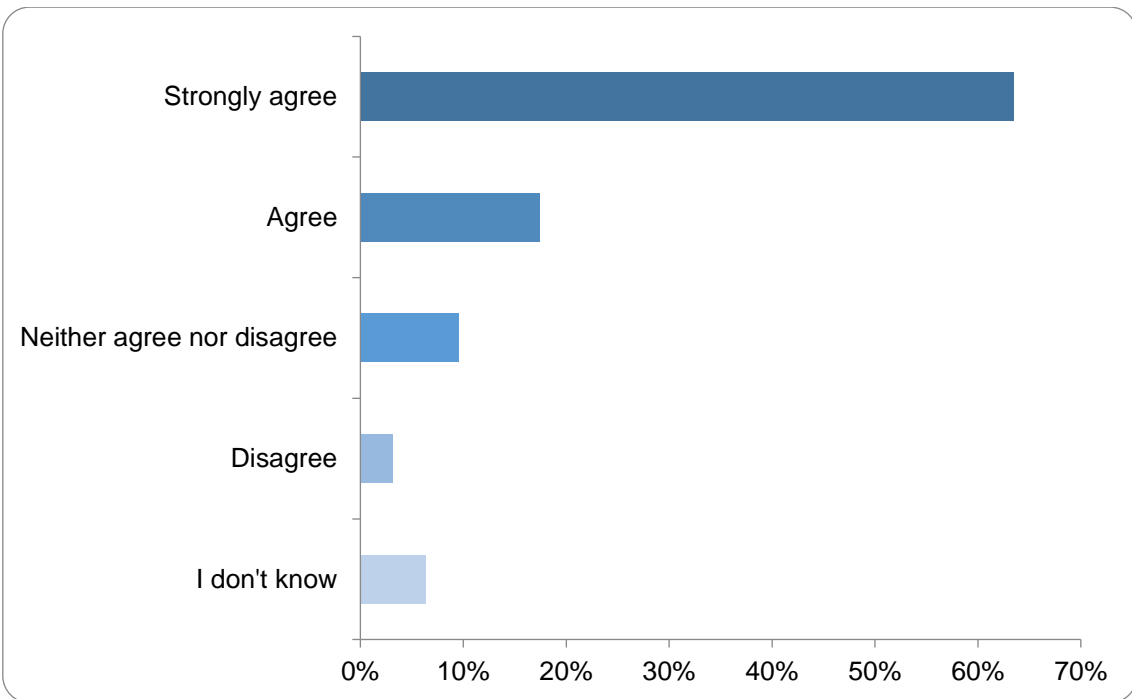
Policy AS13 – Berinsfield Garden Village

Full Survey: Which option do you prefer?



Of the 53 people who responded to this question, 92% preferred Option A. 537 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 63 people who responded to this question, 80% either agreed or strongly agreed with the proposed draft policy wording. 527 people did not answer.

Full Survey: Summary of main issues raised

Garden Village policy overall:

- Support for this policy highlighted that Berinsfield is well-located for development and to become a sustainable Garden Village, to assist in regenerating the area.

- Some comments noted the importance of consultation and collaborative working on the masterplan, with discussions taking place with stakeholders.
- Doubts raised over the necessity of the policy in addition to policy AS1. There was a suggestion that some of the criterion may be better located in Policy AS1, and that the policy wording is vague.

Infrastructure:

- Some had concerns about traffic arriving via Golden Balls and Chiselhampton to pass through Little Milton on the A329.

Other comments:

- There was support for a locally specific policy, rather than a generic Town and Country Planning Association (TCPA) principles.
- A specific suggestion was that a reference to community ownership should be added to the policy.
- There was a request to set a tree canopy cover target as part of this policy, as well as a request to complete the Ancient Tree Inventory (ATI) for the area. The same respondent welcomed criteria n and objected to any allocation that would cause loss or harm to ancient woodland, or ancient and veteran trees.
- Some concern that there is minimal reference to biodiversity, when the policy should be seeking exemplary delivery of biodiversity through a nature reserve, a minimum of 25% biodiversity net gain and exemplary biodiversity in built development.

Oxfordshire County Council have made comments on the proposed policy wording, particularly relating to archaeology, the Local Green Space designation, and the reference to the Garden Village principles. Oxfordshire County Council Property Team strongly objected to the proposed Local Green Space designation due to the potential for the designation to prevent the Primary School from fulfilling its education functions, including its expansion, where justified or as may be required.

The **Ministry of Defence** highlighted that the site lies within the RAF Benson height and bird strike safeguarding zones. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in these zones, and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Historic England noted that while prior land use may have destroyed or damaged archaeological remains, there is still the potential for archaeological remains to be encountered during and as a result of this development. They supported criterion g and suggested identifying the potential for such remains in the supporting text and connecting with the site's past when shaping the garden village's new identity.

The **Environment Agency** highlighted that it should be made clear that other policies within the plan will also apply to allocated sites - for example, the requirements of the plan policy on flood risk (currently CE6) will also apply to any

allocations. They did acknowledge that draft policy LS1 included a list setting out various technical studies and supporting documents which may also be required alongside any large scale major developments. They also submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land and historical land contamination. They presumed that the intention will be for this site to discharge to Culham STW and highlighted detailed comments regarding SuDS plans, capacity and overflows, which need to be explored through the Water Cycle Study.

How the main issues have been taken into account

The councils remain committed to the inclusion of this policy, due to the crucial part our Garden Communities play in our spatial strategy. We acknowledge that reference to the Garden City principles should be edited in response to Oxfordshire County Council's comment, ensuring the correct principles from the TCPA are referred to.

The policy sets out a series of Berinsfield Garden Village principles, which applies to both the existing village and the land allocated in Policy AS1. As such, allocation specific issues do not need to be repeated in this policy as they are dealt with in Policy AS1, or in other policies in the plan. The NPPF is clear that plans should avoid unnecessary duplication of policies that apply to a particular area. Policy coverage on masterplanning, infrastructure, trees, and biodiversity are sufficiently addressed in Policy AS1, and elsewhere in the Joint Local Plan, making it unnecessary to duplicate policy information in AS13.

Within the supporting text, additional information has been included about the Local Green Space designation in Berinsfield. The Local Green Space was designated in the South Oxfordshire Local Plan 2035, with the Joint Local Plan carrying forward this allocation. The councils are satisfied that the parcels of land continue to meet the NPPF tests for the designating of Local Green Spaces.

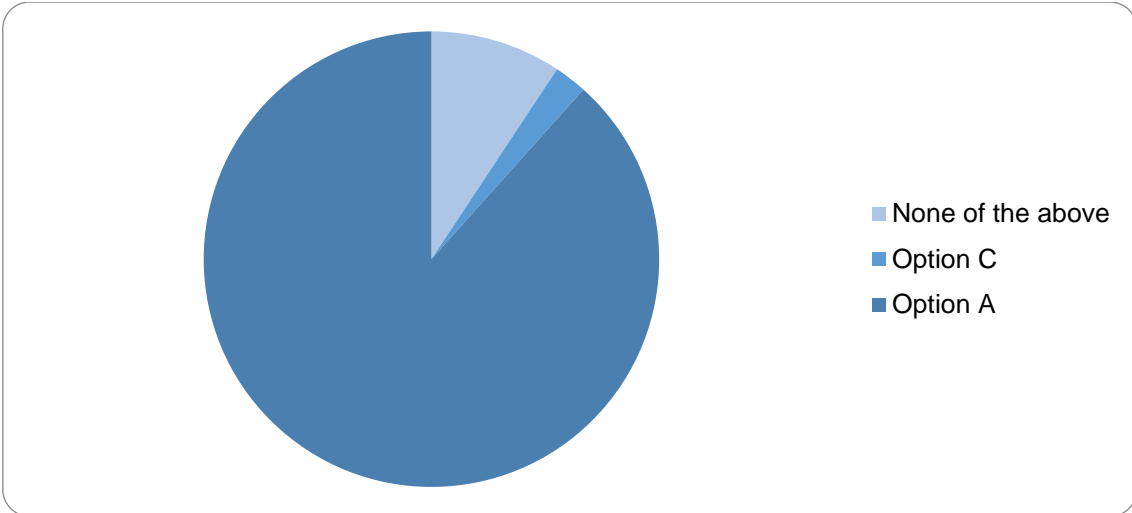
An introductory section has been added ahead of the two Garden Villages that the plan has, this sets out the Town and Country Planning Association's Garden City principles.

Policy changes include:

- The policy wording has modifications relating to the clarification of the Garden City principles that apply and reference to the policies map.

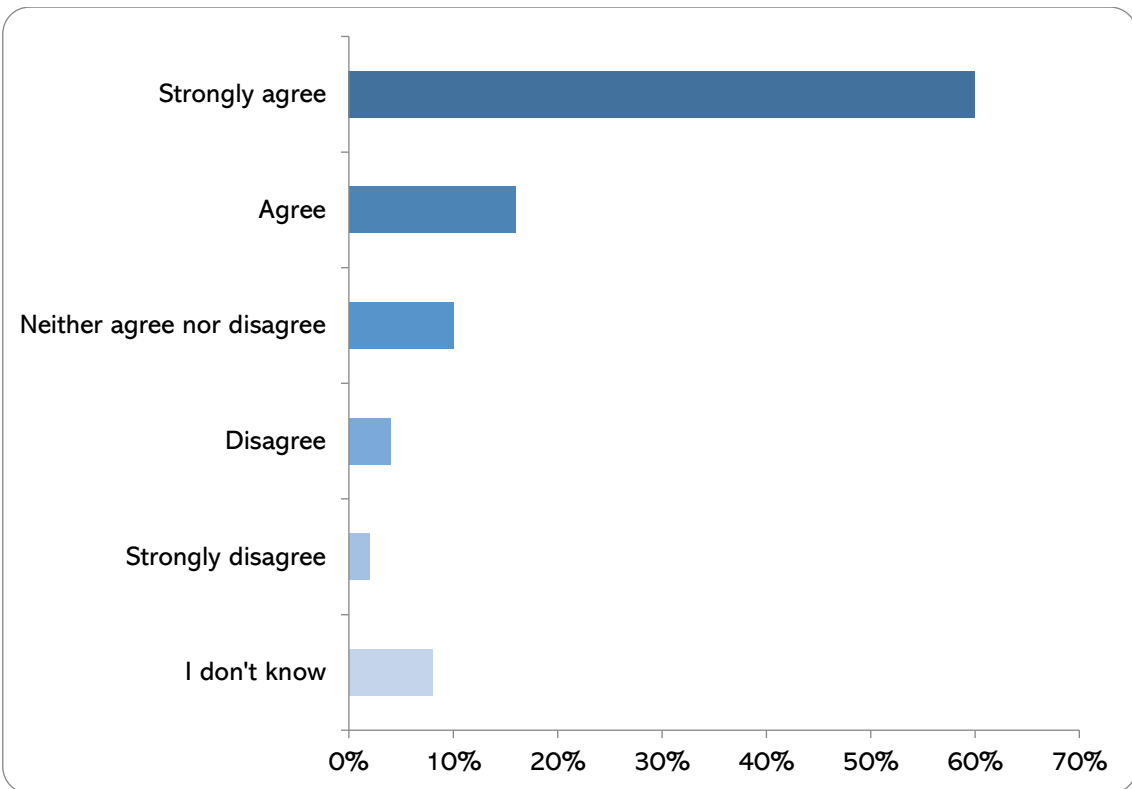
Policy AS14 – Dalton Barracks Garden Village

Full Survey: Which option do you prefer?



Of the 43 people who responded to this question, 88% preferred Option A. 547 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



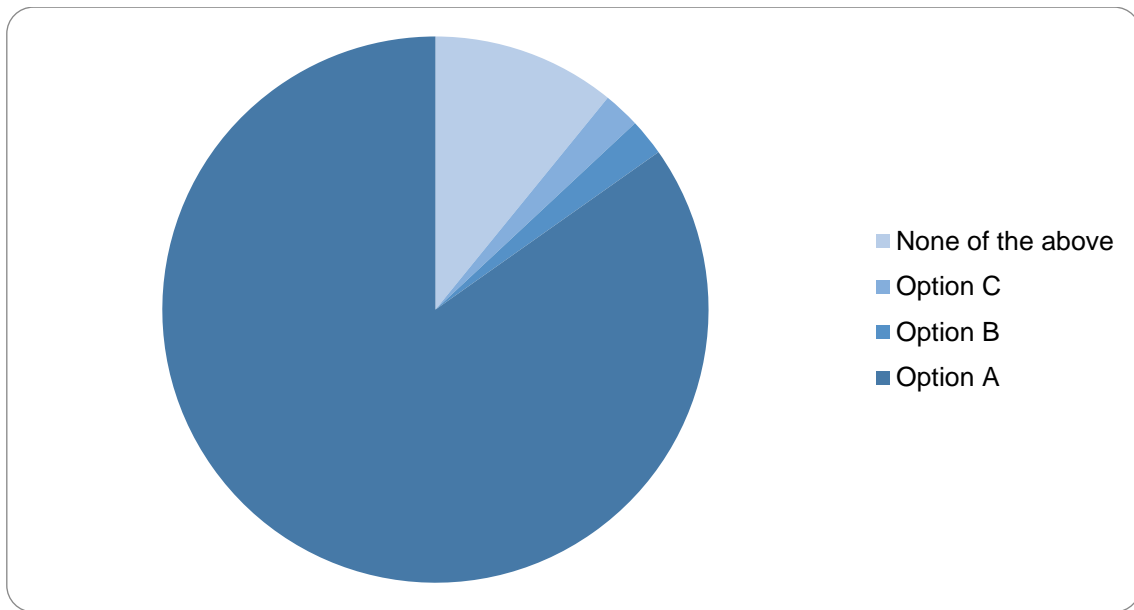
Of the 50 people who responded to this question, 76% either agreed or strongly agreed with the proposed draft policy wording. 540 people did not answer.

Full Survey: Summary of main issues raised

How the main issues have been taken into account

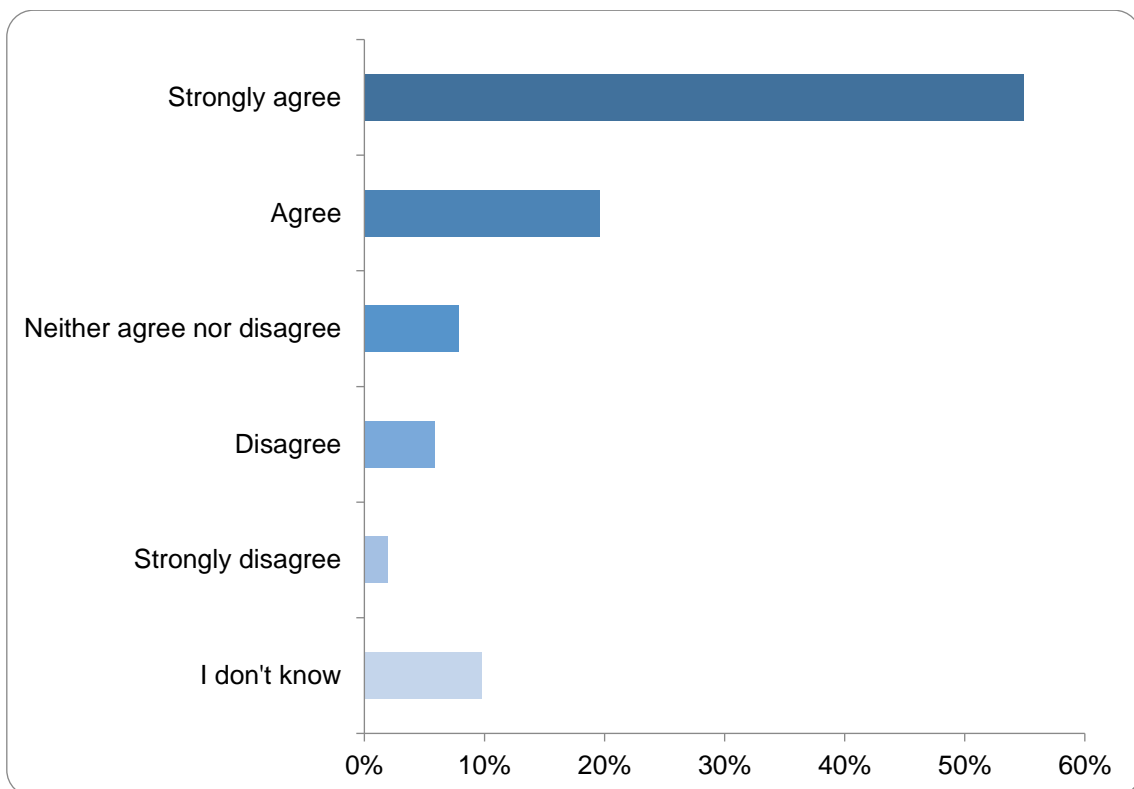
Policy AS15 – Harcourt Hill Campus

Full Survey: Which option do you prefer?



Of the 46 people who responded to this question, 85% preferred Option A. 544 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 51 people who responded to this question, 75% either agreed or strongly agreed with the proposed draft policy wording. 539 people did not answer.

Full Survey: Summary of main issues raised

Site allocation – overall:

- There was overall support for this policy, noting that it proposes development close to Oxford City which reduces travel times and cuts carbon emissions.
- One site promoter contended that the site should be partially deallocated in favour of their client's site.

Infrastructure:

- Some respondents called for the policy to emphasise retention, enhancement and access to the recreational and sporting facilities for the Botley community.
- One respondent requested that the policy should require a transport assessment within a Travel and Traffic Plan.

Other comments:

- Respondents requested that the policy include a clause that development proposals meet the Green Belt requirements set out in Policy SP1 (Spatial Strategy).
- The site owner objected to the policy on the grounds that it reaffirms the historic position of retaining its educational and recreational use. They called for a wider range of uses to be captured in the policy and contended that the site should be removed from the Green Belt.
- Some respondents requested that the policy should protect the groundwater supply of Raleigh Park Local Wildlife Site spring-fen.
- Some respondents suggested amendments to the policy text, including broadening the conditions to apply to 'any future leaseholder or interested party' and specifying 'higher education' as one of the retained uses instead of simply 'education'. Another questioned whether the network of footways and cycle routes can be provided.
- There was a request that stakeholders are included in discussions before masterplans are created. Another respondent requested that the policy require the masterplan to be "prepared to a level as required for an outline planning application".

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land, and biodiversity and fisheries. They stated that development at this site will increase flows to Oxford sewage treatment works. They have significant concerns about infrastructure capacity and water quality related to Oxford sewage treatment works which need to be explored through the Water Cycle Study.

The **Woodland Trust** welcomed the wording regarding the integration of built form into the landscape. They recommended setting a tree canopy cover target as part of this policy and also an Ancient Tree Inventory to comply with NPPF requirements for the protection of irreplaceable habitats.

Sports England stated the importance of the sports facilities at Harcourt Hill to residents of Oxford City and the Vale of White Horse. They advised that it would be acceptable to relocate the facilities, but not to reduce them without robust

justification. They recommended that the developers be guided by the Leisure Facilities Assessment & Strategy and Playing Pitch Strategy.

The **Ministry of Defence** highlighted that the site lies within the Central Wide Area Multilateral Network technical safeguarding zone. They set out in their response the type of development that would trigger the statutory safeguarding consultation requirement in this zone, and recommended that wording is included in the policy that indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Oxfordshire County Council stated that any planned development at the campus should be subject to a comprehensive masterplan and traffic modelling exercise. There must be investment into public transport, pedestrian / cycle infrastructure, and appropriate design and provide transport assessments to support future development at this site. They requested that the policy wording is amended to “...*high quality* footways and cycle routes...”

How the main issues have been taken into account

We note the overall support for the policy relating to Harcourt Hill Campus, and the recognition of the importance of retaining the recreational, sporting and educational facilities provided by the site and we remain committed to the inclusion of this site. Harcourt Hill Campus is located in a wooded section of the Oxford Green Belt on the urban-rural fringe and its curtilage falls within the setting of protected views. It is important that the policy for Harcourt Hill Campus retains its Green Belt setting and protected views. However, requests for cross-referencing to other policies in the JLP have not been incorporated. This is because any development proposals will be assessed according to the plan, so cross-referencing in this way is not required.

The suggestion to broaden the conditions to apply to any leaseholder or landowner is helpful and has been incorporated into the policy text. However, the suggestion to specify higher education has not been incorporated. This is to allow for a broad range of potential educational uses should the site be subject to significant change.

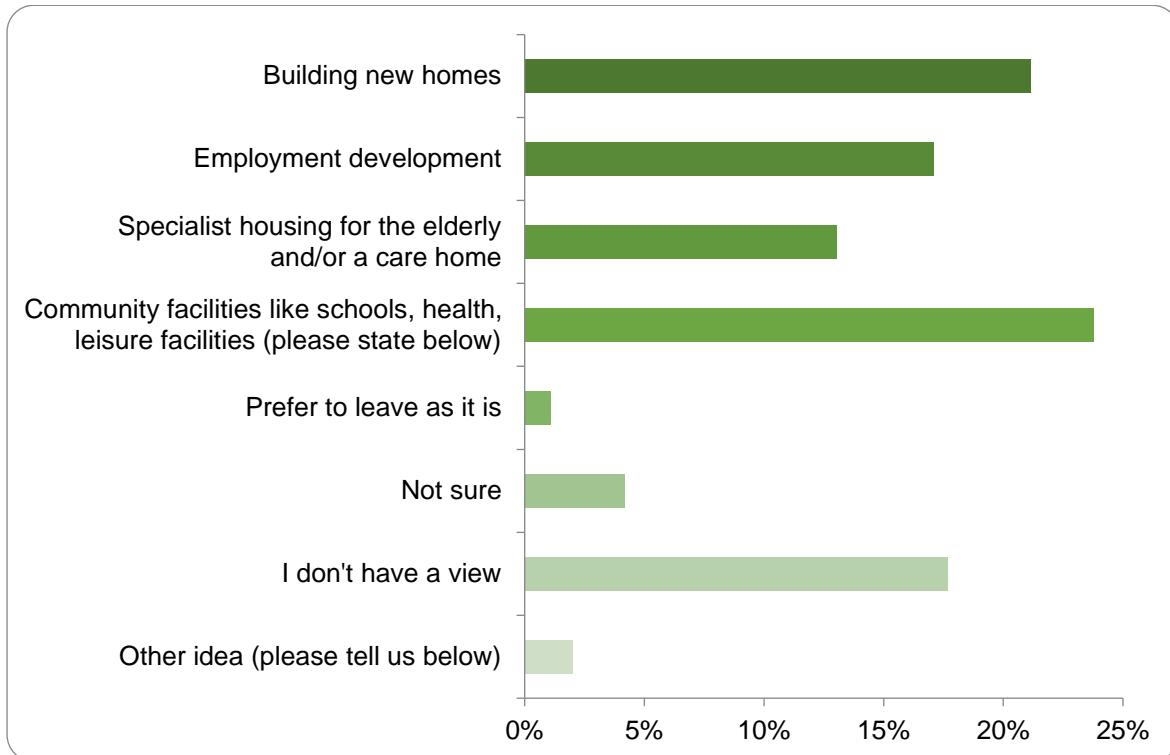
Protections to ensure the ongoing operation and capability of defence sites and assets are covered in The Town and Country Planning (safeguarded aerodromes, technical sites, and military explosives storage areas) Direction 2002, so do not need to be repeated in local plan policy text.

Policy changes include:

- The policy text has been amended to apply to any landowner or leaseholder.
- The policy text has been amended to ensure the masterplan identifies and addresses any impact of development on the Oxford Sewage Treatment Works.
- The policy text has been amended to split requirements regarding promotion of non-car modes of transport and requirements for investment into public transport and active travel into separate policy lines.

Policy AS16 – Land at Crowmarsh Gifford, Benson Lane – site of former district council offices

Nutshell (Section 14): What do you think are the best use(s) of the Crowmarsh Gifford site? Please tick as many as you like:



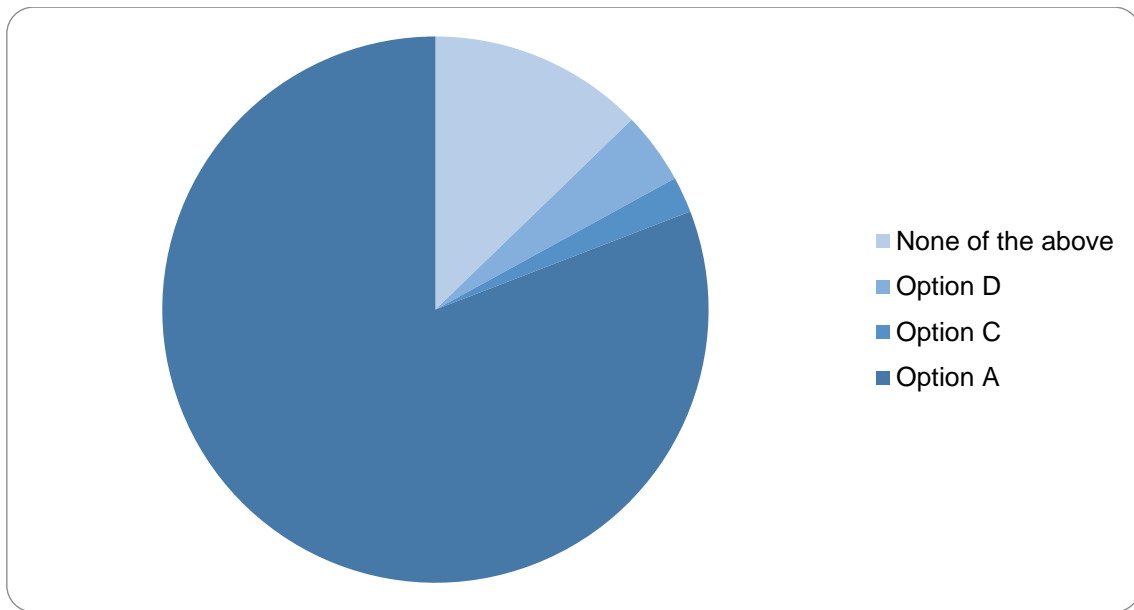
Of the 546 people who responded to this question, 24% of people thought the best use of the Crowmarsh Gifford site was for community facilities. 21% though the best use was for building new homes. 18% did not have a view. 136 people did not answer.

Nutshell (Section 14): This brownfield site is likely to see change over the next 15 years - what things would make this a great place? You could tell us for example your suggestions for the mix of uses, the layout, space for nature, or the types of community and transport facilities needed for this site?

115 people answered this question.

The most common suggestion was for community facilities to be delivered on site, including healthcare provision, leisure facilities (including a pool), a community venue, which could include spaces for younger people, and education (including SEND provision). Other suggested uses included retail, employment and housing, of which respondents suggested a need for affordable housing and specialist housing for older people. Respondents suggested a mix of uses would be preferable and supported redevelopment of the brownfield site, which some believed is currently an eyesore. Some respondents felt the community should decide what uses are developed on site, and that any development should improve nature and biodiversity on site.

Full Survey: Which option do you prefer?



Of the 47 people who responded to this question, 81% preferred Option A. 543 people did not answer.

Full Survey: Summary of main issues raised

- Respondents provided several different suggestions and mix of suggestions for how the site could be used, including: medical centre; GP unit within a care home; dentists; leisure; recreation; youth provision; community facility; coffee shop; specialist housing for older people and/or disabled people; transport hub; college; council offices.
- Some respondents thought the site should retain its employment use but others said the location doesn't support its ongoing employment use and that there is a lack of demand for additional employment space.
- The landowner suggested there was strong evidence of a need for additional older persons accommodation in the Plan area. Also that an alternative option could be a transport hub for district council operations.
- Some suggested it is an ideal site for a mix of targeted social housing and community facilities, noting the community has lost its only shop and is reliant on Wallingford.
- There were some detailed comments on facilities for bus provision/improvement.

The **Environment Agency** submitted detailed comments in relation to water quality, flood risk, groundwater and contaminated land. They stated that development at this site would likely discharge to Benson sewage treatment works. Given that the intended use is still under consideration it is difficult to assess the impact on the sewage treatment works. They noted the site is in Flood Zone 2 and the need for testing, through the Strategic Flood Risk Assessment.

Historic England recommended preparation of a proportionate heritage impact assessment to ensure the policy approach is suitably informed by the site's heritage

significance, including taking account of where pockets of archaeological remains may survive.

Oxfordshire County Council advised they will continue to work with the district councils on advising on this potential allocation.

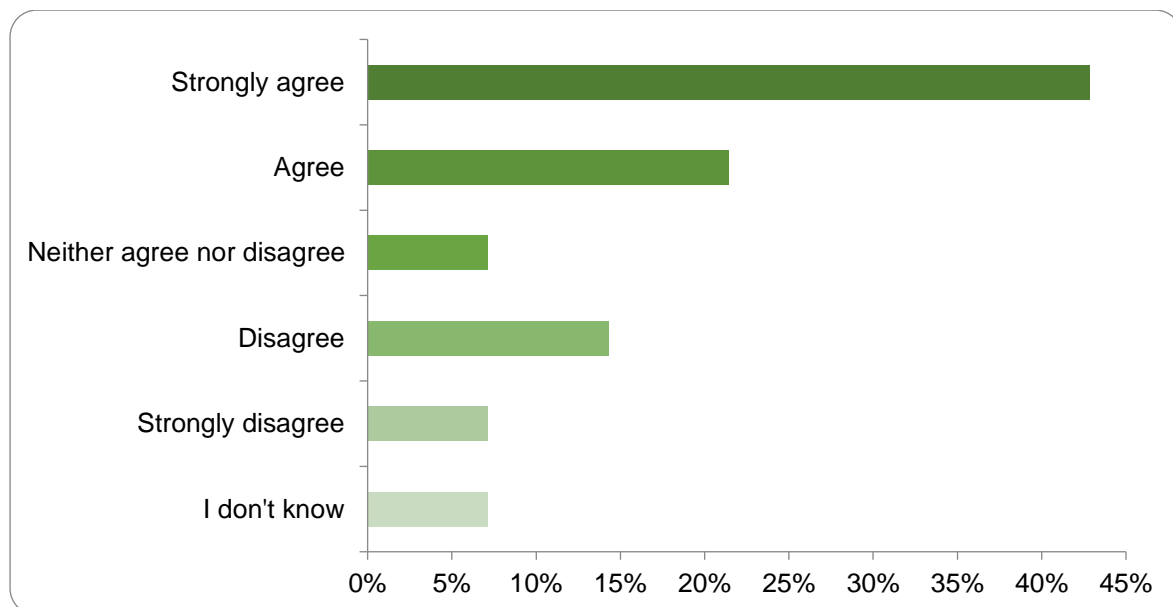
How the main issues have been taken into account

The proposal at Preferred Options stage of the JLP to allocate the former council office site at Crowmarsh Gifford for development has not been carried forward into the draft submission version of the plan. There is no identified need to allocate this site for residential or employment uses of any type. One of the landowner's promoted uses would see a continuation of the established employment use of the site and therefore does not require an allocation to be made at this time. A future allocation could be considered through a future Local Plan or Neighbourhood Plan.

Please note: The policy reference 'AS16' has now been used in relation to a separate allocation site: Vauxhall Barracks, Didcot

Vauxhall Barracks

Nutshell (Section 13): How far do you agree or disagree with keeping the Vauxhall Barracks site allocation?



Of the 14 people who responded to this question, 64% of people either agreed or strongly agreed with keeping the Vauxhall Barracks site allocation. 668 people did not answer.

Nutshell (Section 13): Other comments on Vauxhall Barracks

8 people answered this question.

The comments received suggested no further development should be delivered in Didcot, which the respondents felt has already had too many new homes. There was concern about the potential increase in flood risk and the need to retain existing

trees and vegetation. Vauxhall Barracks was considered a viable brownfield site capable of supporting expansion, with good transport links. Any site design would need to be improved based on existing developments.

Full Survey: Summary of main issues raised

Please note: As Vauxhall Barracks did not have a detailed policy during in the Preferred Options version of the Joint Local Plan, we did not have a specific question regarding the site in the Full Survey, nor did we receive any written representations through this survey.

How the main issues have been taken into account

Vauxhall Barracks was included in policy HOU2 (Sources of housing supply) as 'saved site', carried forward from the South Oxfordshire Local Plan 2035 (and from previous local plans before that). We didn't consider it was necessary to include a policy for this site as it comprised fewer than 500 homes and there were no changes to the site capacity between the adopted and proposed local plans. However, Rich's Sidings and Broadway and Didcot Gateway did have capacity updates which is why we included policies for those in the Preferred Options Consultation (Policies AS6 (Rich's Sidings and Broadway) and AS7 (Didcot Gateway)).

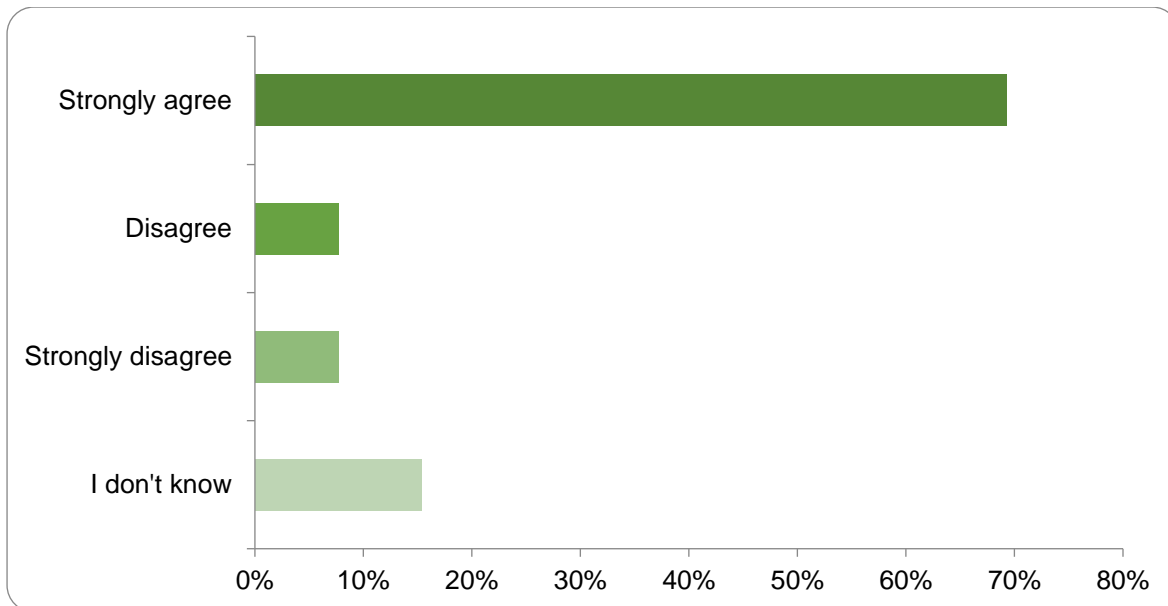
Following feedback from the Preferred Options Consultation, we have decided that it would be appropriate to contain more detail for the three Didcot sites' development. Therefore we have now included a detailed policy for Vauxhall Barracks under Policy AS16 (Vauxhall Barracks).

In the Preferred Options Consultation, Policy AS16 was assigned to Crowmarsh Gifford. However, the landowner is not certain which use they want to progress on the site at this time. One of the landowner's promoted uses would see a continuation of the established employment use of the site and therefore does not require an allocation to be made at this time. A future allocation could be considered through a future Local Plan or Neighbourhood Plan.

We have included a new policy and supporting text to expand on the detail for the proposed allocation of Vauxhall Barracks to deliver approximately 300 homes. The policy specifies development requirements in alignment with the other Didcot site allocations (Policies AS6 (Rich's Sidings and Broadway) and AS7 (Didcot Gateway)).

West of Priests Close, Nettlebed

Nutshell (Section 13): How far do you agree or disagree with deleting West of Priests Close, Nettlebed site allocation?



Of the 13 people who responded to this question, 69% of people strongly agreed with deleting West of Priests Close, Nettlebed site allocation. Nobody selected agree or neither agree nor disagree. 669 people did not answer.

Nutshell (Section 13): Other comments on West of Priests Close, Nettlebed

6 people answered this question.

Respondents agreed with the deletion of this allocation, highlighting the value of the landscape in this area. Respondents thought development was not appropriate in this location and did not think it was necessary to deliver any more housing in Nettlebed. One respondent felt that previous consultation comments had not been listened to.

Full Survey: Summary of main issues raised

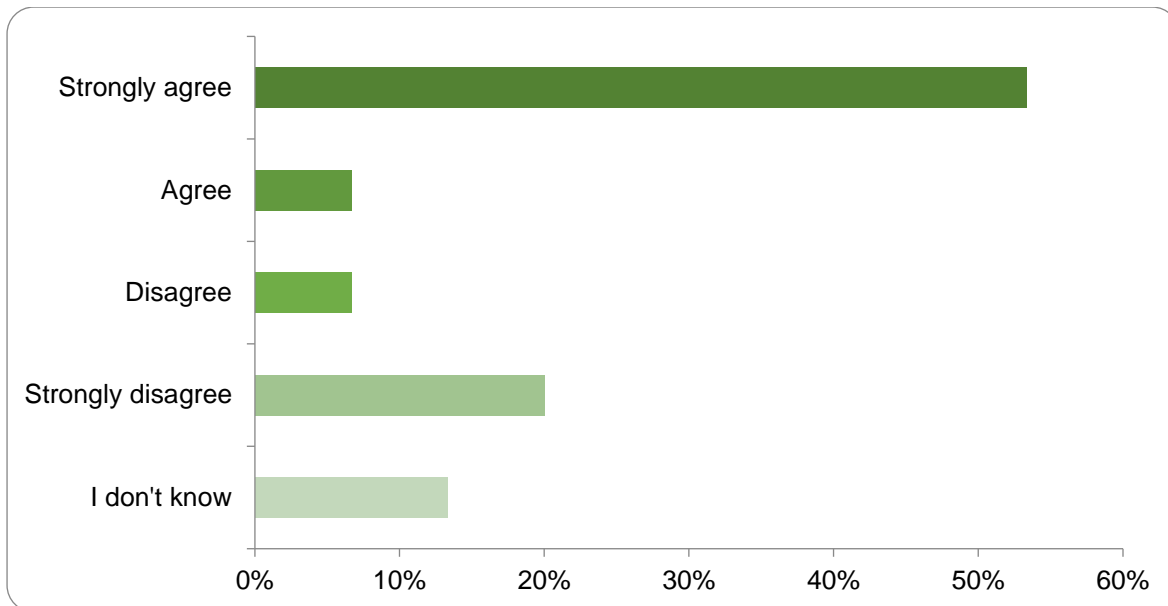
Most of the respondents agree with the deallocation, as there is a low level of housing needs within the area given the relative far location from Oxford City Centre.

How the main issues have been taken into account

Our position in relation to sites at Nettlebed has not changed since the Preferred Options Consultation and we will not be including these sites as allocations within the Joint Local Plan.

Land south of Nettlebed Service Station

Nutshell (Section 13): How far do you agree or disagree with deleting Land south of Nettlebed Service Station site allocation?



Of the 15 people who responded to this question, 60% of people either agreed or strongly agreed with deleting Land south of Nettlebed Service Station site allocation. Nobody selected neither agree nor disagree. 667 people did not answer.

Nutshell (Section 13): Other comments on Land south of Nettlebed Service Station

7 people answered this question.

Respondents agreed with the deletion of this allocation, highlighting the value of the landscape in this area, which was considered particularly beautiful. Respondents thought development was not appropriate in this location and did not think it was necessary to deliver any more housing in Nettlebed. One respondent thought a sports centre could be built in this location.

Full Survey: Summary of main issues raised

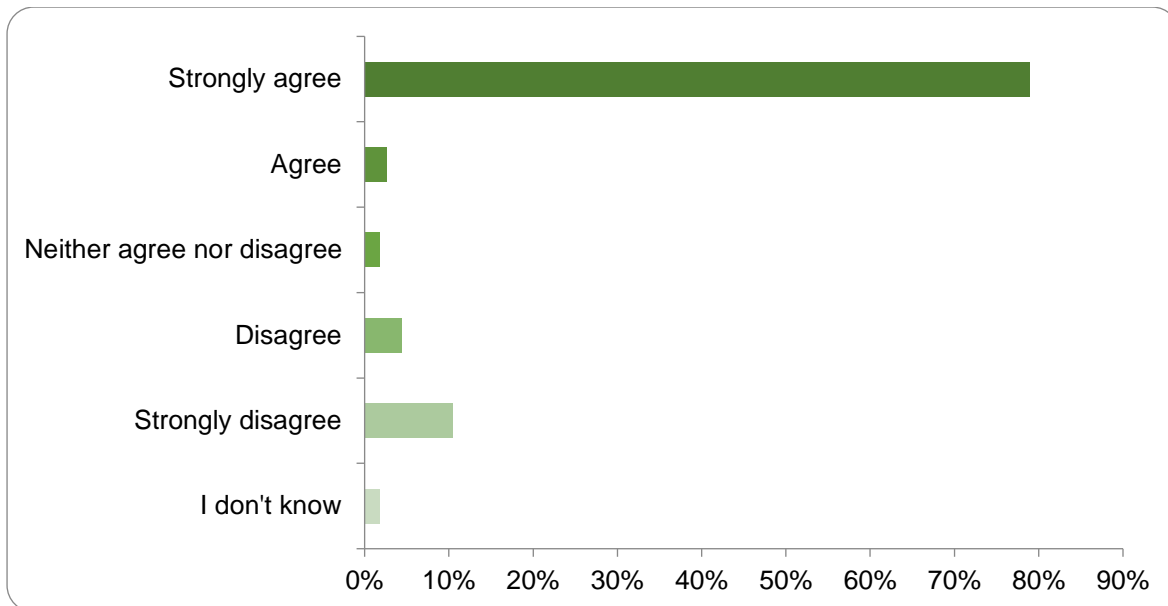
Most of the respondents agree with the deallocation, as there is a low level of housing needs within the area given the relative far location from Oxford City Centre.

How the main issues have been taken into account

Our position in relation to sites at Nettlebed has not changed since the Preferred Options Consultation and we will not be including these sites as allocations within the Joint Local Plan.

Land at Chalgrove Airfield

Nutshell (Section 13): How far do you agree or disagree with deleting the land at Chalgrove Airfield site allocation?



Of the 114 people who responded to this question, 82% of people either agreed or strongly agreed with deleting the land at Chalgrove Airfield site allocation. 568 people did not answer.

Nutshell (Section 13): Other comments on Chalgrove Airfield

92 people answered this question.

The majority of respondents agreed with the deletion of Chalgrove Airfield as an allocation, citing insufficient local transport and social infrastructure to support the development, sufficient housing in the area already, negative impacts on local employer Martin-Baker Aircraft Company, and environmental concerns including flooding. The location of the site was raised as a concern by some respondents, who said it was poorly location with respect to Oxford, where respondents felt housing development should be focused. Some respondents disagreed, suggesting the site should be retained as it is a brownfield site. Others queried whether the site fits the definition of brownfield.

Full Survey: Summary of main issues raised

- Despite the JLP not allocating the site, some wanted to remark with their concerns which included the suitability of the location as a rural location isolated from the main towns, Oxford, employment sites and lack of public transport connections. Some considered its location not to be supported by the spatial strategy, leading to a car-based development and that there are other sites are better suited to address our housing needs.
- Others objected to the removal of the site, noting that the site is an existing allocation, not within or previously within the Green Belt and it would be brownfield redevelopment within a location in accordance with the spatial strategy. Some suggested the scale of the development and infrastructure delivery would overcome concerns about its more rural location and that it would have wider sustainability benefits.

- A number of comments were received in support and objecting to the deliverability of the site. Those considering the site undeliverable highlighted that a current leaseholder does not want to release the land, that there is an incompatibility of the current and proposed uses of the site and point to objections to development at the airfield from the Civil Aviation Authority (CAA). Others, including the site promoter, considered that the issues relating to the deliverability of the site can be overcome, including through a potential option of incorporating additional land to the north.
- Comments were received regarding the potential for inclusion of additional land to the north. Some considered this to be significant incursion into the countryside, detracting further from the brownfield credentials of the site. Others, including the site promoter, disagreed considering the additional land would not increase the developed footprint significantly and could provide additional benefits.
- Concern was raised about whether development would be viable given the infrastructure needed to support the development and the potential for a Compulsory Purchase Order (CPO) if an agreement with the leaseholder can't be reached.
- Concern was raised how infrastructure the site would deliver or contribute to could be funded/secured, if the site was removed as an allocation, and whether this would negatively impact viability of other sites.
- A number of responders supported the removal of the site stating it was no longer needed to meet our housing need. Others however considered the housing needed had not been adequately established and it had not been fully demonstrated the site is not needed.
- Some considered an alternative approach to either keeping the allocation or removing it, would be to consider an alternative capacity either higher or lower than the adopted policy position.
- Concerns were raised regarding the methodology and approach to assessing the achievability and suitability of the allocation and the failure to engage positively with the landowner.

Oxfordshire County Council highlighted that concerns with this site were previously raised through the South Oxfordshire Local Plan as the site is located some distance from higher tier settlements. If the site isn't developed a number of highway mitigation measures will no longer be required including Chiselhampton, Stadhampton and Cuxham bypasses. Other highway improvements linked to the site will still be required to mitigate the cumulative impacts of other developments. The site was required to provide two primary schools and a secondary school incorporating a relocation for Icknield Community School from Watlington. Icknield school is expected to need to grow even without the Chalgrove allocation. Land has been secured to provide for that growth within Watlington. No solution to capacity issues at the existing primary school in Chalgrove have been identified.

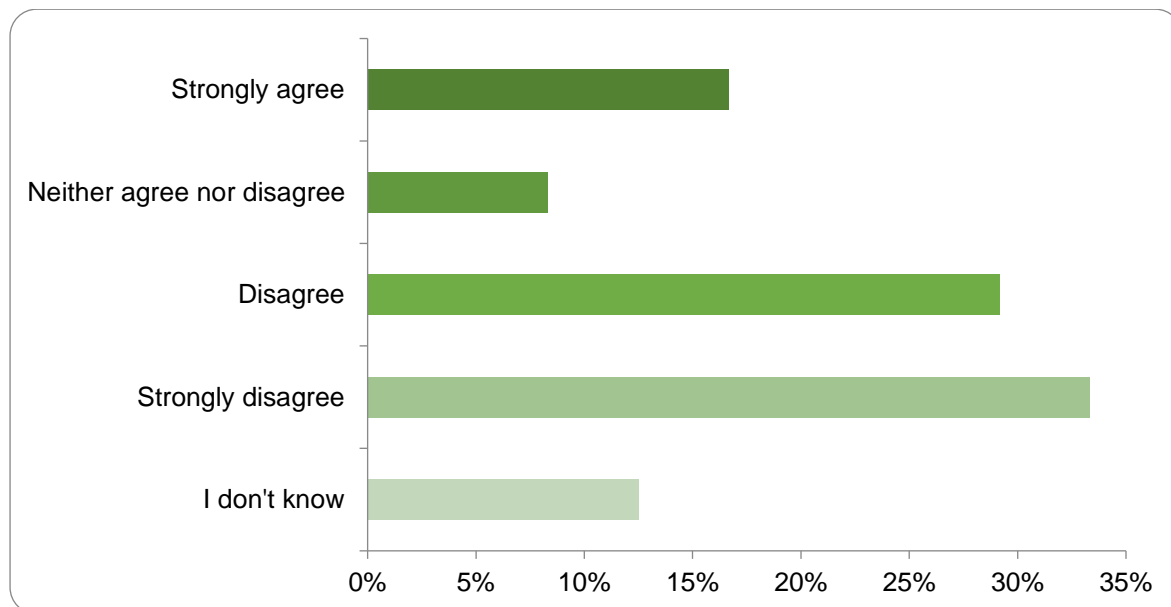
How the main issues have been taken into account

Our review of existing allocated sites has demonstrated that the allocated development is unlikely to be achievable, and that this site is no longer suitable for development. There are a range of unknown and unevidenced impacts that are possible with the call for alternative site boundaries, which would not be proportionate to explore given the housing land supply available to meet identified needs.

Our position in relation to this site has not changed since the Preferred Options Consultation and we will not be including Land at Chalgrove Airfield as an allocation within the Joint Local Plan.

North West of Abingdon-on-Thames

Nutshell (Section 13): How far do you agree or disagree with keeping (as part of the site does not have planning permission) the North West of Abingdon-on-Thames site allocation?



Of the 24 people who responded to this question, 17% of people strongly agreed with keeping (as part of the site does not have planning permission) the North West of Abingdon-on-Thames site allocation. Nobody selected agree. 658 people did not answer.

Nutshell (Section 13): Other comments on North-West of Abingdon-on-Thames

15 people answered this question.

Respondents were opposed to the development of the section of the North-West of Abingdon-on-Thames allocation that does not have planning permission as they were concerned about overdevelopment in Abingdon-on-Thames. Respondents thought infrastructure was insufficient to support development, including the road network. The site was considered to negatively impact flooding and raised concern about Abingdon-on-Thames and Oxford merging. Respondents felt that the Green Belt and agricultural land should be protected.

Full Survey: Summary of main issues raised

Please note: As North-West of Abingdon-on-Thames did not have a detailed policy during in the Preferred Options version of the Joint Local Plan, we did not have a specific question regarding the site in the Full Survey, nor did we receive any written representations through this survey.

How the main issues have been taken into account

North-West of Abingdon-on-Thames was included in Policy HOU2 (Sources of housing supply) as a site carried forward from the Vale of White Horse Plan 2031. We didn't consider it was necessary to include a policy for this site as it comprised fewer than 500 homes and there were no changes to the site capacity between the adopted and proposed local plans. This position has not changed and it remains in policy HOU2 of the Publication Version of the Joint Local Plan, with its adopted policy carried forward into Appendix 5 of the JLP.

Other sites

Nutshell (Section 14): Can you suggest any other brownfield sites in sustainable locations that we should consider?

50 people answered this question.

Respondents suggested a variety of specific sites, including those in Abingdon-on-Thames, Didcot, Crowmarsh, Botley and Radley. Some respondents suggested more generally the redevelopment of different types of buildings, such as empty shops or retail units, agricultural buildings, unused spaces in industrial areas, and unoccupied council owned buildings.

How the main issues have been taken into account

We did not find the need to allocate further sites when progressing the Joint Local Plan following the Preferred Options Consultation. Many of the sites that respondents had suggested to us were either very small brownfield sites within settlements (therefore there is no need for the plan to allocate them as they can come forward anyway) or were not in line with the spatial strategy. Therefore, we have not included any new allocations based on the brownfield sites suggested.

Other general comments regarding Chapter 8: Site allocations and Garden Villages

Full Survey: Summary of main issues raised

- Some respondents queried how many homes would be delivered in the plan period.
- Some respondents expressed concerns about the deliverability and viability of each site.
- One respondent suggested that developers of large-scale development should be required to consult town and parish councils and local communities.

- One respondent suggested that the allocation of all sites should be reviewed in light of the Climate Emergency, which was declared after the sites were allocated in the last local plans.

Oxfordshire County Council said that references to planning applications will need to be reviewed as appropriate, as pertinent applications will have been submitted since the Preferred Options Consultation took place.

National Highways welcome dialogue on potential growth locations/options to consider impact on the strategic road network. Infrastructure changes on the SRN should be considered as a last resort – prioritise sustainable travel measures first. Need to consider cumulative impact of sites coming forward.

Historic England recommend heritage impact assessments of a proportionate level of detail for Dalton Barracks, Land at Bayswater Brook and Land at Crowmarsh Gifford.

How the main issues have been taken into account

A new appendix to the Joint Local Plan has been produced to show how the housing supply is expected to be delivered between 1 April 2021 and 31 March 2041 across each district (Appendix 4). The number of homes expected to be delivered for each allocated site has been added to the supporting text of the allocated sites in Chapter 8. The viability of the Joint Local Plan as a whole, and each allocated site in particular, has been tested through the Viability Assessment. Policy DE3 (Delivering well-designed new development) requires masterplans and design codes to demonstrate that they have been prepared with the involvement of the local community.

A site selection process paper has been prepared alongside the Joint Local Plan, which reassesses the suitability of all sites.

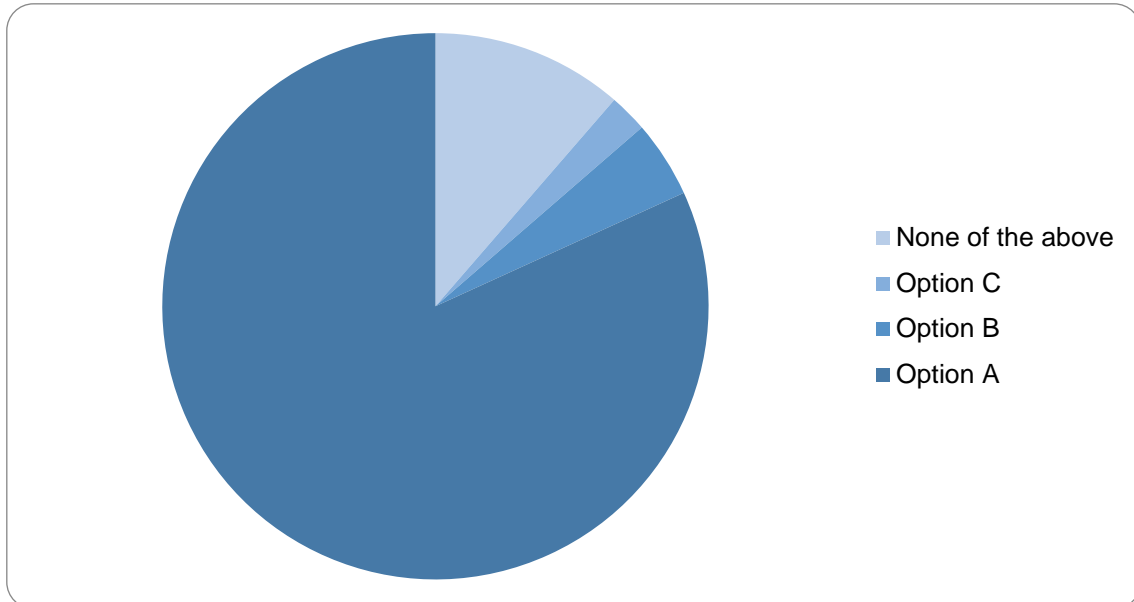
The transport evidence base has been developing throughout the Regulation 18 process and a range of evidence and topic papers are published along the Regulation 19 publication version of the JLP.

Heritage Impact Assessments for Dalton Barracks and Bayswater Brook are to be published alongside the Regulation 18 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 being prepared for the site which will be submitted at the Examination of the Local Plan.

Town centres and retail

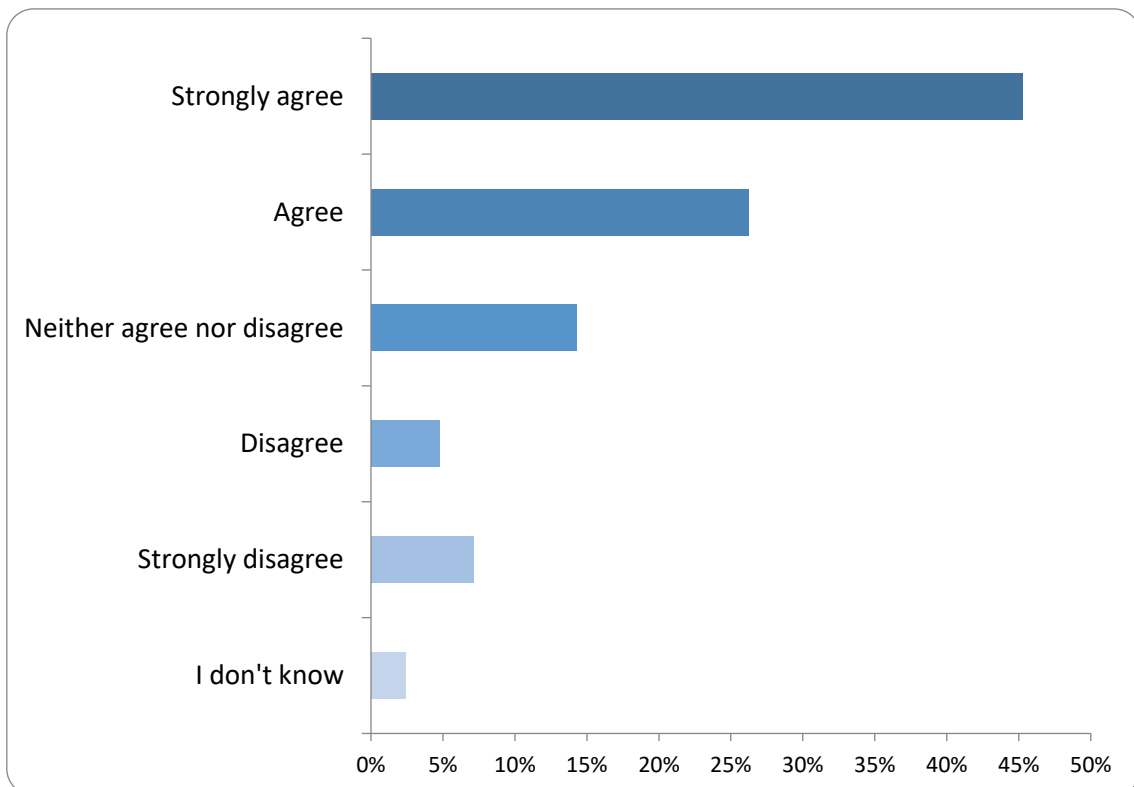
Policy TCR1 – Overnight visitor accommodation

Full Survey: Which option do you prefer?



Of the 44 people who responded to this question, 82% preferred Option A. 546 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 42 people who responded to this question, 71% either agreed or strongly agreed with the proposed draft policy wording. 548 people did not answer.

Full Survey: Summary of main issues raised

- Some concern about identifying Didcot as the Principal Town Centre for the area. The town centre is often gridlocked at weekends and policy doesn't address traffic or air pollution impacts. No need to define a principal town centre in South Oxfordshire and Vale of White Horse. Doing so would create imbalance of investment between the two council areas and other towns such as Abingdon.
- Just two respondents thought that Didcot warranted its position at the top of the town centre hierarchy because it had the largest proportion of retail floorspace, had land to develop/regenerate and had good car parking, bus and station links.
- Several respondents felt that there was a discrepancy between the Centre Hierarchy (as described in this policy) and the Settlement Hierarchy (as per Policy SP2) without clear explanation.
- Support for Thame as a town centre and Watlington as Local Service Centre within the hierarchy.
- Linkages to other centres should be acknowledged (Swindon, Oxford, Witney, Aylesbury, Newbury, Reading, Hungerford, Cirencester etc).
- One respondent suggested that Botley should be reclassified as a Town Centre to reflect its population size and that the centre boundary should be extended (to include the Seacourt Park area and industrial estates south of the B4044), as there was considerable scope to improve these areas to better serve the Botley community.
- Thame Town Council felt that the suggested primary shopping area should be extended to link the Cattle Market site (allocated in the Thame NDP for town centre uses) with the High Street.
- Wantage and Grove should be considered as one, not split as town centre & local service centre.
- Chinnor is now too large to be considered a 'local centre' and needs support to remedy the lack of sufficient infrastructure/services to keep pace with housing growth.

Oxford City Council supports Option A as it helps to achieve consistency. However, Option C is vague and may not be a genuine alternative because of similarities to the Preferred Option.

How the main issues have been taken into account

We recognise there may be unintended negative consequences of identifying Didcot as the Principal Town Centre in South Oxfordshire and Vale of White Horse. We have therefore removed the 'Principal Town Centre' tier from the Centre Hierarchy altogether and have now listed Didcot under the 'Town Centre' tier.

The centre hierarchy and settlement hierarchy have different purposes. We have made this clearer in the supporting text. We have also added reference to the relationship between the market towns and other larger order centres.

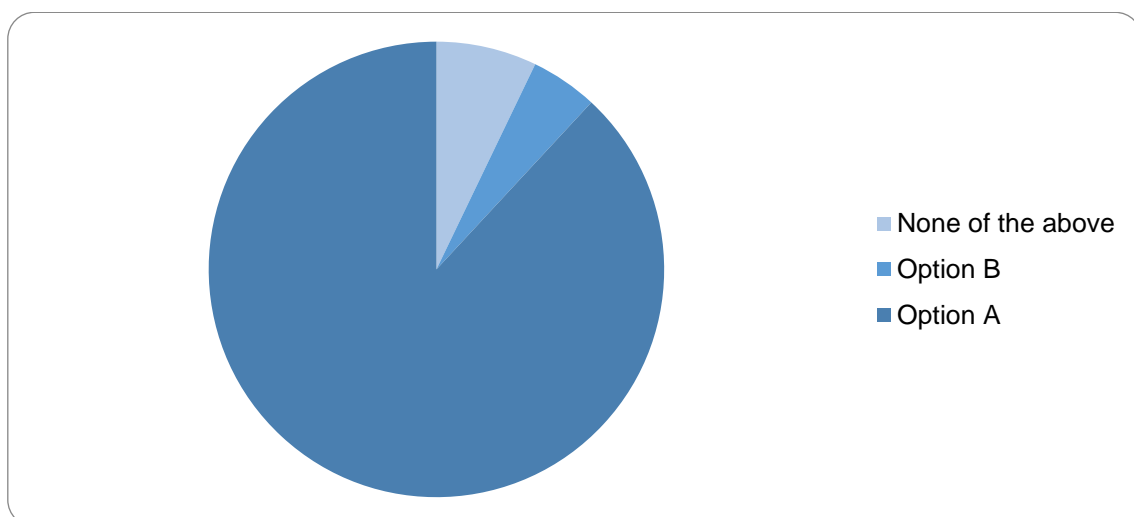
The Town Centres and Retail Study proposes a centre hierarchy based on independent research and national policy guidance. The Study notes that Botley is approx. 2km to the west of Oxford City Centre and, in practice, functions as part of the Oxford urban area. It concludes that the existing centre boundary for Botley generally reflects the area where main town centre uses are concentrated. It therefore only proposes a limited revision to exclude non-main town centre uses (residential properties) on West Way. Given the scale of Botley and the distribution of different uses across the centre, the Study does not recommend identifying a separate primary shopping area, nor does it recommend that Botley is recategorized as a 'Town Centre'.

The Study also concludes that the primary shopping area boundary in Thame reflects the area where main town centre uses are concentrated and therefore does not require extension.

In order to be able to apply the sequential tests in TCR2 we need to be able to define tight town or local service centre boundaries (as per NPPF). Consequently, we cannot draw a wider boundary that includes both Wantage and Grove, even though the two settlements have synergy in other ways. Similarly, we have considered whether to categorise Chinnor as a Local Service Centre, but the settlement is very dispersed, with no central core of retail/service provision. Consequently, it would not be possible to define a tight boundary against which Policies TCR1 and TCR2 could be effectively applied.

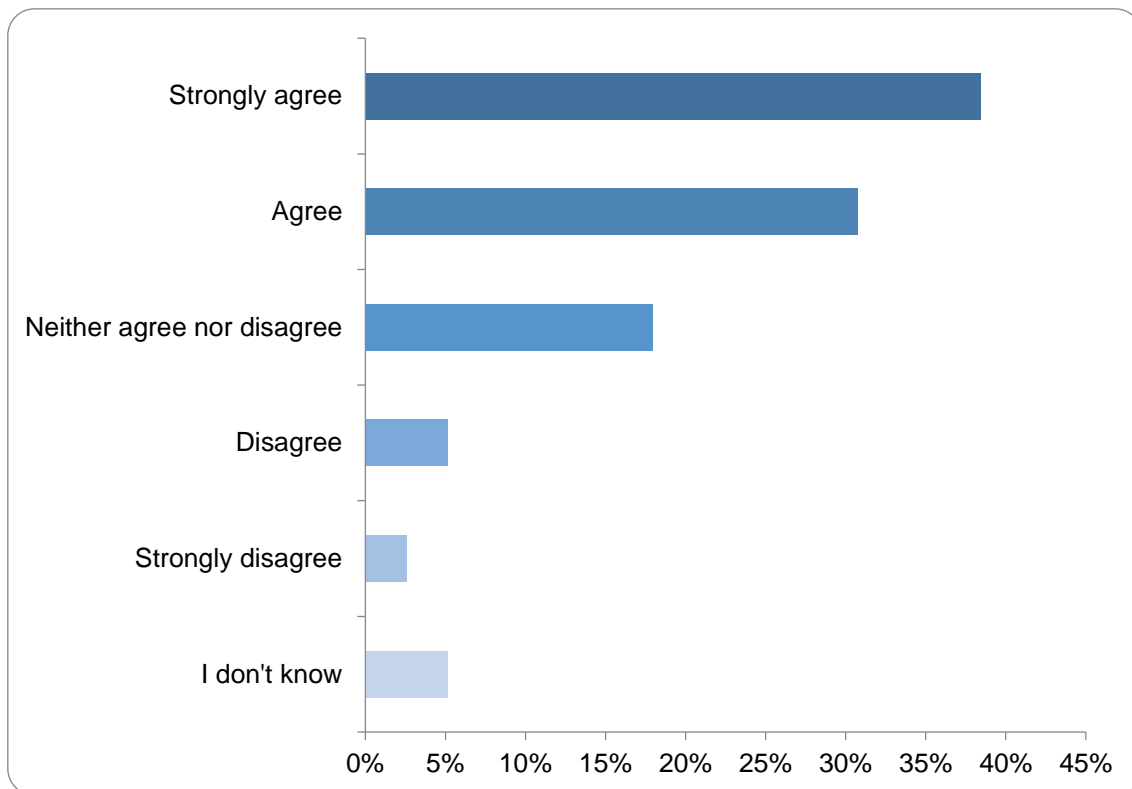
Policy TCR2 – Strategy for town and local service centres

Full Survey: Which option do you prefer?



Of the 42 people who responded to this question, 88% preferred Option A. 548 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 39 people who responded to this question, 69% either agreed or strongly agreed with the proposed draft policy wording. 551 people did not answer.

Full Survey: Summary of main issues raised

- Some support for Option A and its 'Town Centre First' approach, as it is consistent with national planning policy and guidance and supports new retail development in sustainable locations.
- One respondent, however, felt that a 'Town Centre First' approach was not sustainable, and that centres like Didcot were not accessible. Without Park and Ride or other traffic management, they felt there was no scope for more development.
- Support for the sequential test in towns like Thame with few/no town centre sites available for development.
- Policy could make provision for cafes, pubs and promoting street café culture.
- A respondent said TCR2 was needed as Faringdon centre's retail offer had been neglected, leading to decline and loss of customer choice.
- Another considered that, as drafted, TCR2 would conflict with other JLP policies, which do not allow for development at Tier 1 settlements, outside of the urban areas.
- There is insufficient explanation as to what 'exploring opportunities' to repurpose vacant premises might entail and no justification for preference being given to repurposing vacant/outdated premises over new development.

- In Didcot, some retail locations simply aren't viable for high footfall and businesses are closing down, so it would be better if the secondary areas along Broadway were excluded from the Primary Shopping Area.
- How will Parts 1 and 6 operate when Class E of the Use Classes Order gives more flexibility to change the use of premises, which could affect town centre vibrancy?
- Policy could be strengthened by requiring the developer to fund an independent impact assessment, with the supplier chosen by the council.

Oxford City Council supported Option A, but questions why retail is being protected in Part 6, contrary to the changes to the Use Classes Order 2020. The policy may no longer be effective, as there are now many instances in which retail units could be changed to other alternatives without permission. Suggestions for policy edits are made.

Oxfordshire County Council (Public Health team) supported Option A and the proposed policy wording which seeks to promote the vitality of town centres through a 'Town Centre First' approach whilst allowing flexibility in how they develop. Thriving town centres that can meet a diverse range of community needs are important to promoting health and wellbeing and healthy place shaping.

How the main issues have been taken into account

Policy TCR2 already supports an appropriate mix of retail and other main town centre uses, which include cafes, restaurants, pubs etc. However, we have highlighted in the supporting text that supporting an appropriate range of new retail and other town centre uses will help to protect the ongoing vitality and viability of town and local service centres, both during the day and evening.

We disagree that TCR2 would conflict with other JLP policies that do not allow for development at Tier 1 settlements, outside of the urban areas.

TCR2 is consistent with the sequential approach set out in the NPPF. In Part 2, TCR2 refers to 'out of centre' locations, but this does not mean outside of the settlement itself, simply outside the defined town centre boundaries.

We have explained in the supporting text that we would expect applicants with proposals for new retail floorspace to have first explored opportunities to re-use vacant premises and to provide detail of their investigations as part of their planning application. Preference is given to re-purposing vacant premises, to protect and promote the vitality of our town centres, in the absence of any demonstrable need for new comparison floorspace.

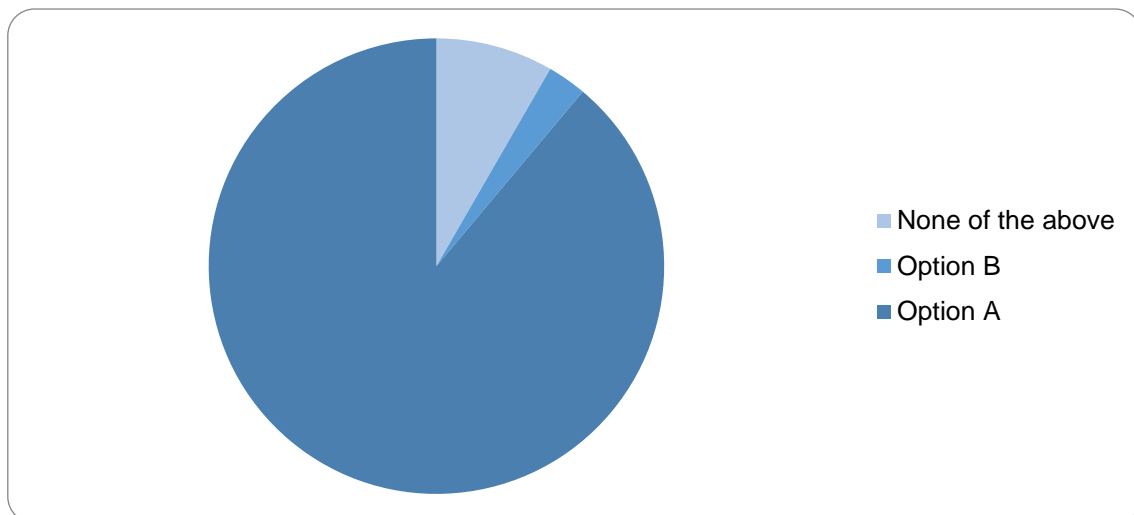
We appreciate that parts of Broadway, Didcot are not faring as well as the Orchard Centre from a retail perspective. However, including these premises within the PSA highlights the contribution that they can make to the overall vitality and viability of the town centre and does not reduce the flexibility for changes of use within Class E, afforded by the Use Classes Order (UCO) and permitted development rights.

We recognise the current limitations of local plan policy regarding its ability to control the quantity/location of retail and town centre uses since changes to the UCO were introduced. However, Policy TCR2 has been drafted to be consistent with para 90 of the NPPF, and we explain in the Town Centres & Retail Topic Paper that, whilst the councils currently have limited means to protect against loss of retail or service use floorspace in the JLP, we have attempted to future proof our policies against any further changes to the way in which the UCO or Permitted Development Rights apply to the change of use (of buildings or land) within our town centres, or against changing local circumstances with the potential to have a negative impact on the role or function of any of the centres in our defined Centre Hierarchy. Similarly, whilst the above limitations are recognised, Part 6 of TCR2 is specifically drafted to protect against loss of retail floorspace in primary shopping areas. We do not want to refer to specific use classes in TCR2, as this could prematurely outdate the policy in the light of further changes to the UCO.

Regarding the suggestions about independent impact assessments, Part 3 of TCR2 already requires applicants to agree the scope of any impact assessment in advance with the relevant council. This gives development management officers the opportunity to stipulate the detail required and raise any concerns about the intended approach taken early on.

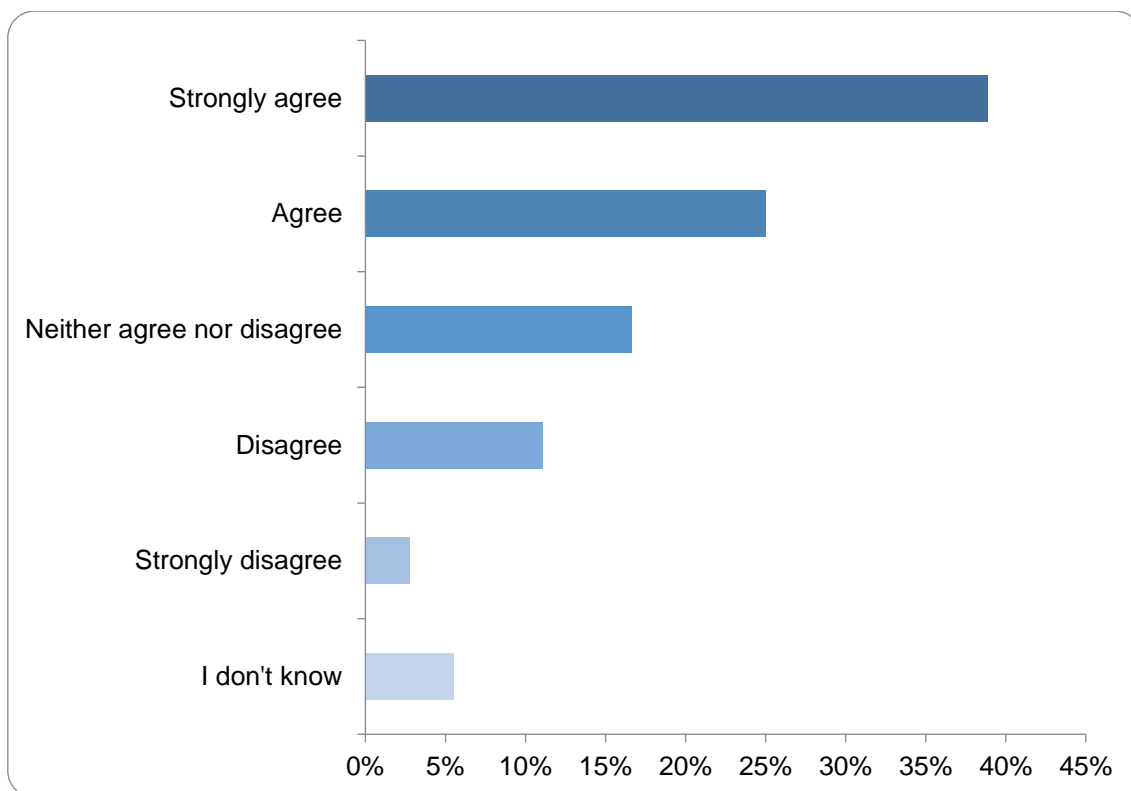
Policy TCR3 – Retail floorspace provision (convenience and comparison goods)

Full Survey: Which option do you prefer?



Of the 36 people who responded to this question, 89% preferred Option A. 554 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 36 people who responded to this question, 64% either agreed or strongly agreed with the proposed draft policy wording. 554 people did not answer.

Full Survey: Summary of main issues raised

- Overall support for Option A in principle.
- It was noted that the Town Centres & Retail Study (Dec 2023) says Thame has poor retention of convenience goods expenditure and overtrading of existing food stores. However, the Plan fails to allocate any new convenience floorspace to improve market choice and reduce the need to travel.
- Policy TC4 of the South Oxfordshire Local Plan 2035 sets out a requirement for a 1,500sqm convenience food store in Thame (with a site to be allocated in the NDP Review), but this quantum isn't reflected in TCR3.
- In Part 1(a), first preference should be to accommodate convenience goods retail floorspace within Primary Shopping Areas (PSA). Citing a preference for 'brownfield/regeneration sites within defined town or local service centres could be misinterpreted as giving preference to 'edge of centre' sites over units/sites within the PSA.
- A single shopping centre expansion in Didcot could create serious traffic problems.
- There is no comparison retail floorspace identified for Faringdon, contrary to Policy SP5a.
- Internal configuration of new shops must be designed with wheelchairs and rollators in mind.

- One respondent suggested that west of Didcot would be an ideal location for any new shops – good access to A34 and would help alleviate traffic pressure in the town centre.

How the main issues have been taken into account

Whilst the Town Centres and Retail Study does identify some overtrading of existing food stores in Thame, it does not identify a need for any additional new convenience floorspace over and above that already identified in Policy TC4 of the South Oxfordshire Local Plan 2035 (i.e. the requirement for a single format, 1,500 sqm net food store, as allocated in Policy GDR1 of the Thame Neighbourhood Plan Review, Submission Version (April 2024). We have however, added reference in our policy wording to the outstanding convenience floorspace requirements in both Thame and Henley-on-Thames.

Our preference is for brownfield/regeneration sites within the town or local service centres. However, the sequential test will apply, so sites within Primary Shopping Areas will always be preferable to ‘edge of centre’ sites.

The JLP is not allocating any further comparison retail floorspace in Didcot, however, the Town Centres and Retail Study does conclude that the retail and service offer in Didcot is strong and that the town centre should continue to meet the relatively wide range of residents’ needs in South Oxfordshire and Vale of White Horse , which is why TCR3 states under Part 2 that ‘Didcot Town Centre will remain the primary focus for any additional comparison retail floorspace across both districts’.

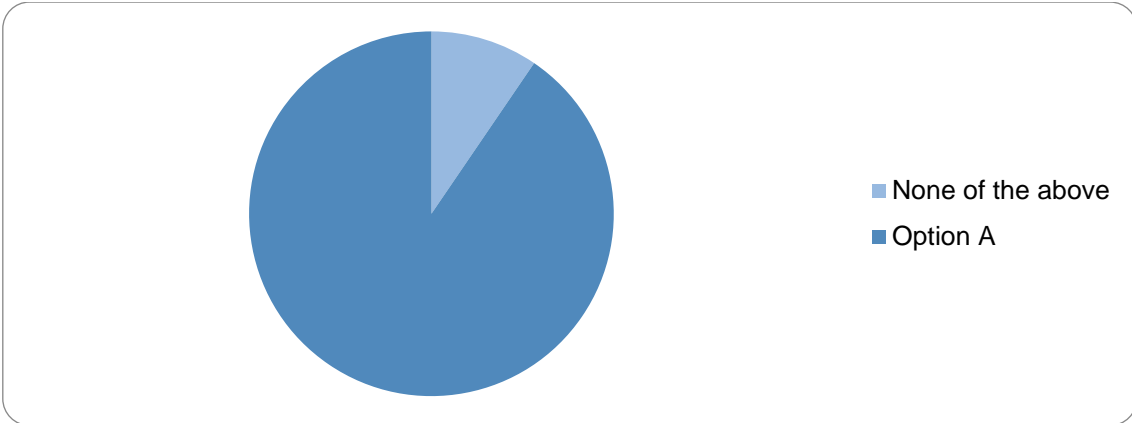
Policy SP5 (a) states that the councils will support development proposals which ‘strengthen the convenience retail and leisure offer and provide other community or service uses...’ within Faringdon town centre. However, the Town Centres and Retail Study does not identify any quantitative need for new comparison floorspace in Faringdon.

Design details of retail proposals would be determined at the application stage. Part (5) (g) of Policy DE1 states that all development must achieve high quality design that ‘understands and addresses the needs of all potential users by ensuring that buildings and their surroundings can be accessed and used by everyone through universally accessible and inclusive design...’

Site allocations (e.g. North West of Valley Park) do include provision of new convenience floorspace, which will serve the day to day of new residents to the west of Didcot.

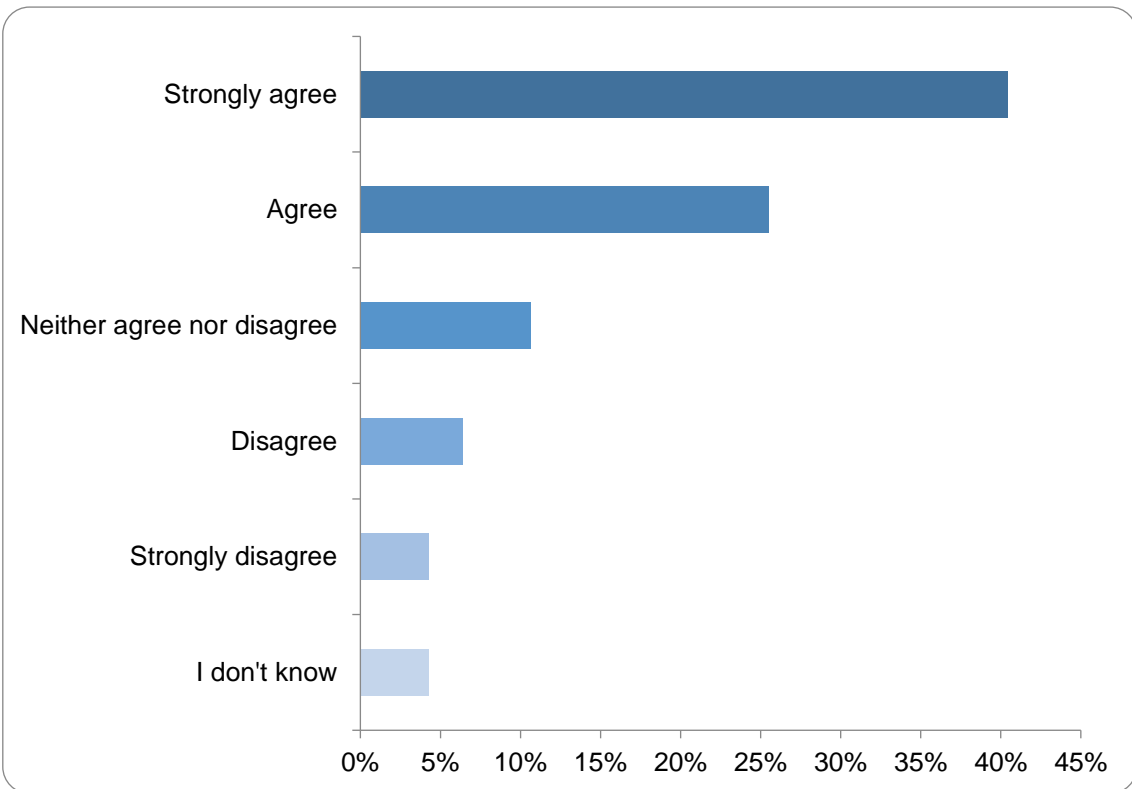
Policy TCR4 – Retail and service provision in villages and local centres

Full Survey: Which option do you prefer?



Of the 42 people who responded to this question, 90% preferred Option A. 548 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 43 people who responded to this question, 66% either agreed or strongly agreed with the proposed draft policy wording. 547 people did not answer.

Full Survey: Summary of main issues raised

- Overall direction of Option A is supported - a local retail offer helps those communities who have no public transport and who don't drive.
- Some suggested that Part 3 was unclear as it refers to loss of a facility, but references replacement in the same context.

- There was some support for a specific policy on farm shops, but also some concern that the words ‘not undermining the viability and vitality of shopping provision in a nearby village or local centre’ are too restrictive and need replacing with ‘demonstrably’ or ‘significantly’, to actively encourage the setting up/expansion of genuine farm shops, without any fear of ‘undermining viability’ of existing shops.
- One business owner suggested that it would be helpful for the policy to define a ‘farm shop’ by a percentage of sales coming from produce grown or made on the farm – they said this should not just be an option to be sought by planning condition. However, they also explained the need for flexibility to allow farm shops to sell other appropriate goods too, so they can attract customers and remain financially viable.
- It was suggested that the consideration of proposals for farm shops should include assessment of their impact on landscape, traffic, dark skies etc.
- Concerns were raised that restrictions on change of use cited in Part 3 are unduly onerous and should be left to market forces.
- One parish council felt that the policy should recognise the cumulative effect of new housing in a town/village and state that additional retail space will be required if there is a shortfall.

Oxford City Council - supports the objectives of Policy TCR4, although the policy states that proposals for retail or commercial leisure development in excess of 200 sqm gross will require an impact assessment, as opposed to 300 sqm which would align with Policy TCR2 and the Use Classes Order.

How the main issues have been taken into account

We have reworded Part 3 to explain that, where a replacement use is proposed, it must also complement the function and character of its immediate locality, and that consideration will be given to any community benefits of the proposed replacement use and any impact on the community resulting from loss of the existing shop or service use.

We recognise that we should be actively encouraging the supply of locally grown food and note the concerns raised about undermining the vitality and viability of nearby village or local centres. Consequently, we have amended Part 4 to clarify that new farm shops will be supported where they do not demonstrably undermine the viability and vitality of shopping provision in a nearby village or local centre. We have also confirmed that control over the types of produce sold and/or the amount of net floor area dedicated to the sale of produce grown or made on the farm may be sought by planning permission. A new definition of ‘Farm Shop’ has also been added to the Glossary.

The Town Centres and Retail Study recommends that the threshold of 200 sqm gross is used in the context of village/local centres. Policy TCR2 refers to 300sqm gross in the context of ‘local service centres’ as opposed to village/local centres, and again this is based on recommendations from the Town Centres and Retail Study. Consequently, we have concluded that no change is necessary to Part 2 of TCR4.

Whilst we agree that consideration of farm shops should include their impact on landscape, traffic, dark skies etc, all JLP policies will apply to new development proposals (including those in Chapters 12 & 13 relating to landscape and transport impacts respectively).

We disagree that restrictions on change of use cited in Part 3 are unduly onerous. Whilst we recognise the policy limitations in light of changes to the UCO and permitted development rights, we consider that, where planning permission is required, it is important to rigorously assess the impact that the loss or change of use of a shop or service use might have on the vitality and viability of the village or local centre.

The Town Centres and Retail Study looked at projected population/ housing growth in South Oxfordshire and Vale of White Horse when assessing the quantitative need for new retail floorspace in our town centres, but it did not identify any outstanding need over the Plan period. Policy TCR4 does, however, seek to protect against the loss or change of use of any existing shop or service use located within a village or local centre, unless specific circumstances apply.

Other general comments regarding Chapter 9: Town centres and retail

Full Survey: Summary of main issues raised

- There is general support for policies that support community use of empty retail units, where possible

Oxfordshire County Council recommended that this chapter includes a policy on restricting new hot food takeaways, highlighting that this is crucial to reducing health inequalities due to the growing problem of childhood obesity and the need to create healthier food environments (particularly in proximity to schools). They recommended that the policy gives a standard restriction on any new hot food takeaways within a 400m radius of a school and/or by not allowing new hot food takeaways in geographical areas with consistently high levels of excess weight in children. They explained that South Oxfordshire and Vale of White Horse have geographical areas with consistently high levels of childhood excess weight and the Joint Local Plan should reflect this. Public Health data was also provided to support this recommendation.

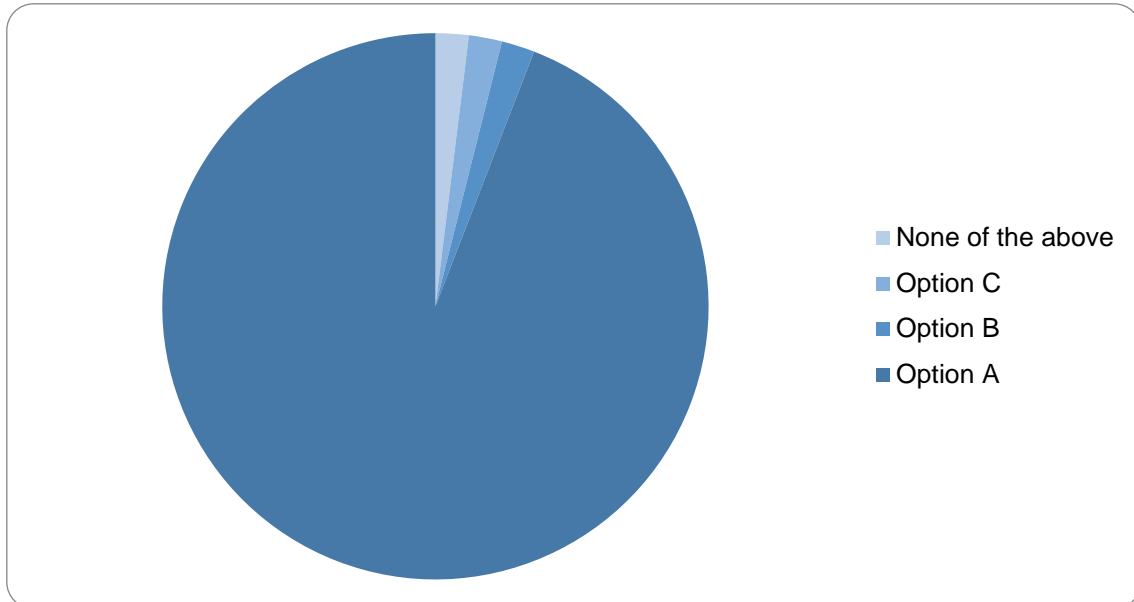
How the main issues have been taken into account

While encouraging community use of empty retail units is largely outside of the scope of the Joint Local Plan, Policy TCR4 (Retail and service provision in villages and local centres) does state that consideration to be given to the community benefits of proposed replacement uses where a shop or service is lost. We do not consider that a specific hot food takeaway policy will be suitable or effective in our districts. There is not sufficient evidence to suggest childhood obesity is a prevalent issue in South Oxfordshire or Vale of White Horse, with both districts performing better than the national benchmark.

Well-designed places for our communities

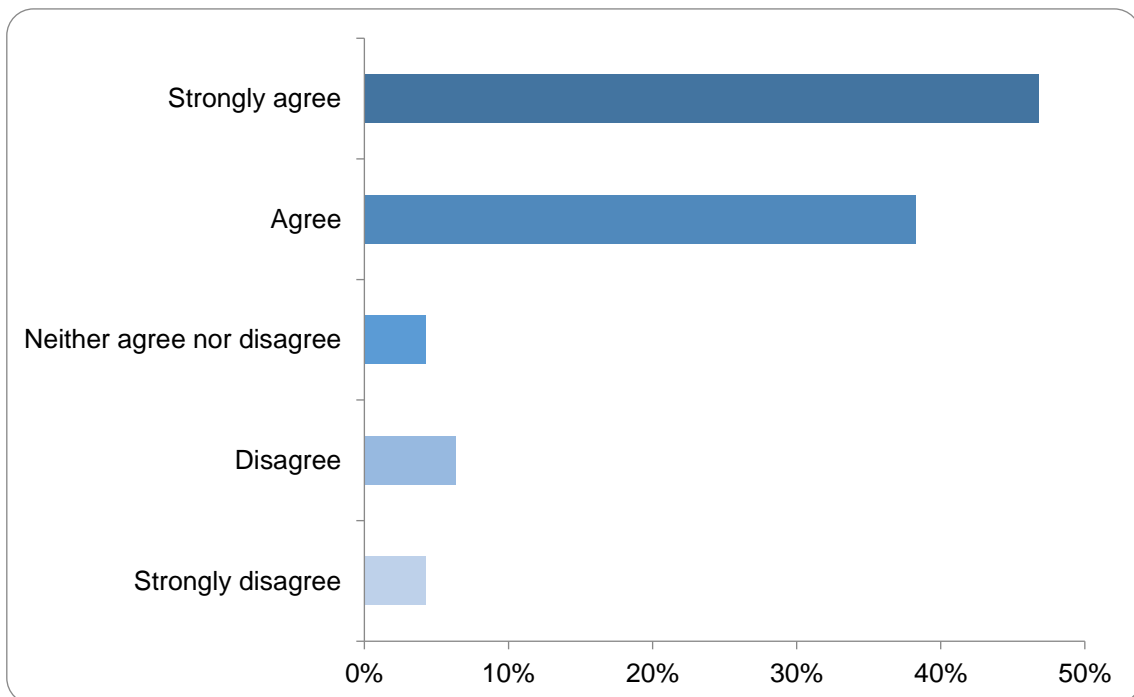
Policy DE1 – High quality design

Full Survey: Which option do you prefer?



Of the 51 people who responded to this question, 94% preferred Option A. 539 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 47 people who responded to this question, 85% either agreed or strongly agreed with the proposed draft policy wording. 543 people did not answer.

Full Survey: Summary of main issues raised

- Broad support was shown for the policy, notably its aim to achieve well-designed new places, with mention from respondents that it was key to delivering the local plan's vision.
- The wording set out in the proposed policy text regarding inclusive and accessible design was welcomed, as well as the mention of consideration given to disabled people in active transport.
- There were some concerns raised regarding the length of the policy, stating it was long and potentially some of its contents would be more suited to supporting text or design guidance, which in turn would make the policy more concise.
- An issue was raised regarding new developments not being well integrated with existing communities, and the need to ensure this policy addresses that issue.
- Some respondents raised that the requirements set out in this proposed policy are addressed by other parts of the plan or national guidance.
- A recommendation was made for the policy (or supporting text) to reference the support for, and the use of, developer led design codes.
- Several respondents highlighted the need for adequate provision of vehicular parking to be designed into new developments for those that still rely on a car for travel, particularly those in rural areas with limited access to public transport.

Sport England recommended that active design principles were included, to be adopted for all schemes, in order to create sustainable healthy developments.

Historic England welcomed this policy.

Oxfordshire County Council welcomed Option A and considered the policy wording to cover a wide range of elements that will contribute positively to the design of future developments. They noted that although they welcomed the inclusion of flood-resilience, the policy should also make reference to buildings being resilient to the effects of hotter summers. They additionally recommended that the policy references the OCC Street Design Guide and emerging Walking and Cycling Design Guidance, and also that the policy includes wording relating to designing for low speeds.

Thames Water, Affinity Water and Southern Water stated that important and sensitive views should be clearly defined (noting that 'attractive' is a subjective term not usually used in landscape and visual assessment), and retention of such views should be weighed against other design and environmental requirements for development.

How the main issues have been taken into account

We recognise that this is a lengthy policy, which includes references to other policies within the plan and also aligns with design guidance set at a national level. However, we do not consider it necessary to shorten the policy, as it contains key design requirements that are essential to achieving a high-quality design standard within the

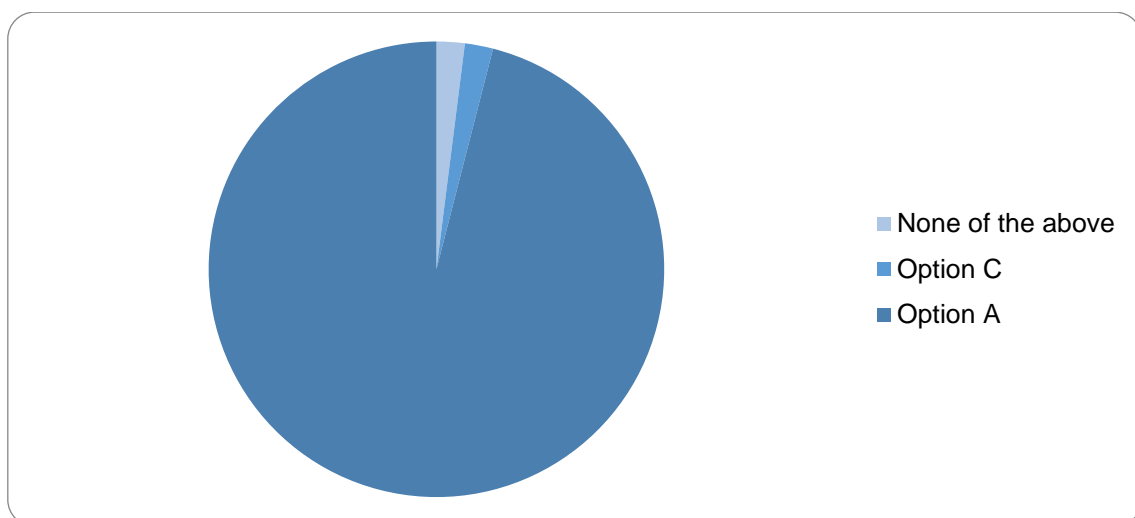
districts. The policy has subheadings to ensure that despite its length, it is still clear and easy to read and understand. Additionally, as good design is an overarching theme of the plan there are key links between Policy DE1 and other plan policies. Therefore, references to these policies have been made to usefully highlight where further design detail may sit within another policy, which we consider is useful for applicants. We are also satisfied that this policy is not replicating national design guidance, although it may align with it due to many principles of good design being universal. It has pulled out key design requirements that are necessary to achieving high quality design in our districts, and therefore is locally specific to South Oxfordshire and Vale of White Horse.

Policy changes include:

- A reference has been made in the supporting text of Policy DE3 (Delivering well-designed new developments), recognising that landowners and developers can also prepare design codes in support of a planning application for sites they wish to develop.
- In response to Sport England’s representation, Sport England’s Active Design guidance has been referred to in supporting text. We are satisfied that the policy wording itself already includes sufficient active design principles.
- Amendments have been made to the policy in response to Oxfordshire County Council’s representation. These include reference to traffic calming measures at Part 3(c) of the policy, which relates to their point on designing for lower speeds, as well as a reference to increasing temperatures at Part 6(a) of the policy, ensuring the policy refers to hotter summers. The supporting text also includes reference to their Street Design Guide and their walking and cycling guidance.

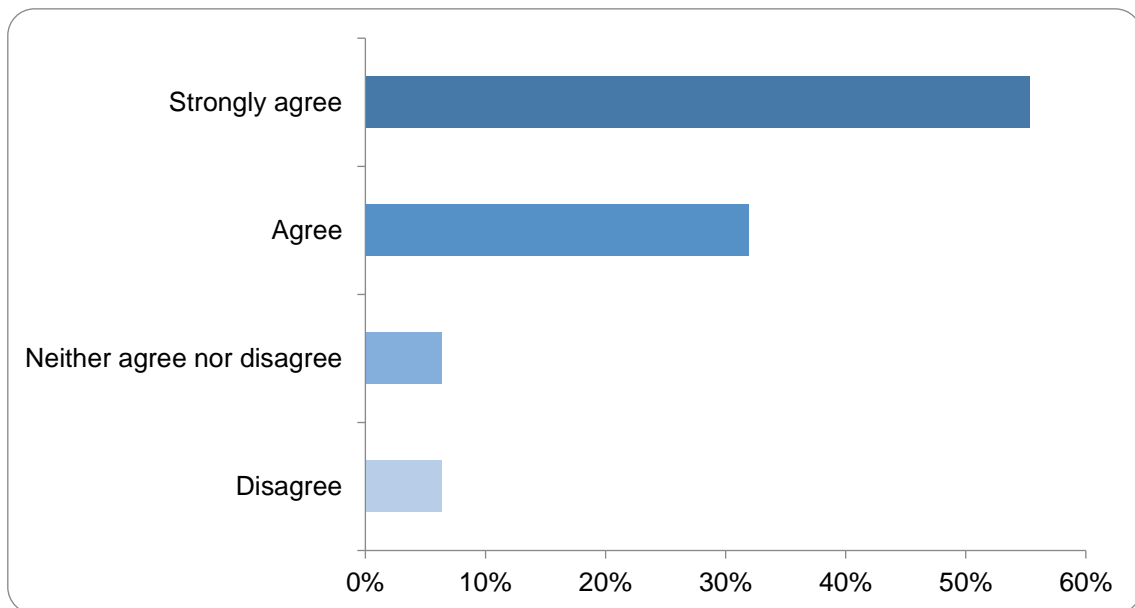
Policy DE2 – Local character and identity

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 96% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 47 people who responded to this question, 87% either agreed or strongly agreed with the proposed draft policy wording. 543 people did not answer.

Full Survey: Summary of main issues raised

- Support was provided for policy Option A, with respondents noting the importance of local character and identity, stating it is what makes places interesting and special and that developments should reflect these positive features of local areas.
- Respondents raised that where development comes forward in an area of existing poor design, that new development needs to improve on this design and not permit similarly poor or just 'acceptable' design.
- A respondent noted that not all conservation areas have had a character study or a conservation management plan, and the Joint Local Plan need to support those areas as well. It was also noted that some of these are out of date, and therefore it is necessary that they are reviewed to ensure they are up to date with existing legislation, national policy, and guidance, before they are considered.
- Concerns were raised by a few respondents that the policy could restrict sustainable growth due to it having an adverse impact on character and noted that character alone should not be a reason for refusal.
- A respondent considered this policy to be an unnecessary duplication of Policy DE1 and the NPPF which requires the design to take into account local character.
- The link in the proposed policy wording to neighbourhood plans was welcomed.

North Wessex Downs National Landscape (AONB) recommended that a reference was included to the North Wessex Downs Colour Guide.

Historic England welcomed this policy.

Thames Water, Affinity Water and Southern Water suggest that draft policies DE2 and NH5 should be combined to avoid duplication.

How the main issues have been taken into account

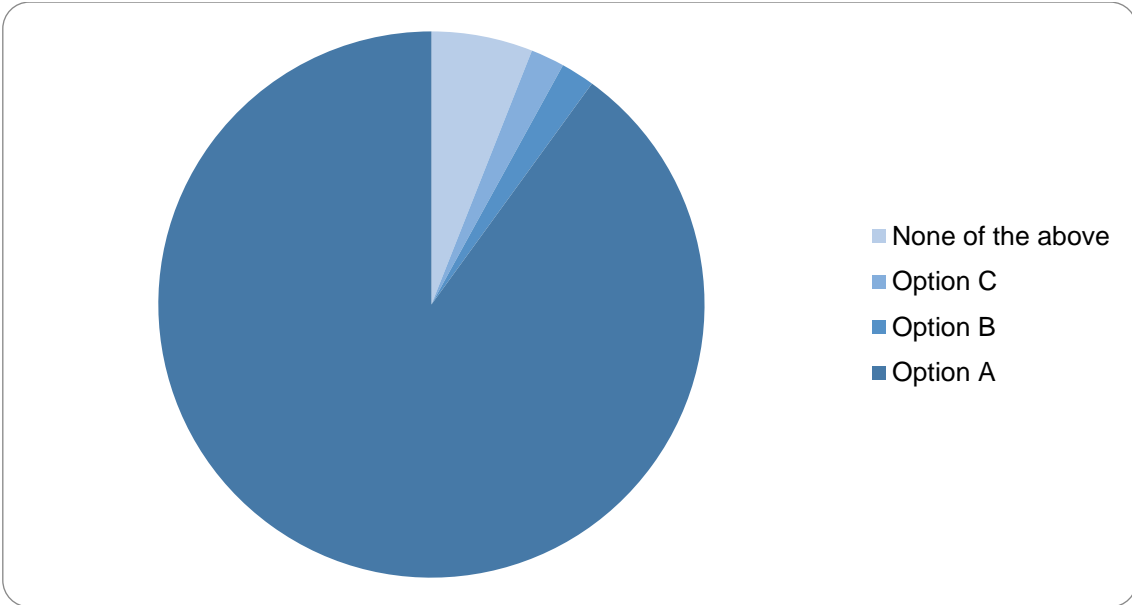
We recognise the concern raised that the policy could potentially restrict sustainable growth due to impacts on character. However, being sympathetic to existing character is a key aspect of good design, and in order for growth to be sustainable, good design is a crucial component of that. Therefore, we are satisfied that this policy will not restrict sustainable growth but will in fact help to ensure growth is managed in a sustainable manner. We also do not consider this policy to be a duplication of national policy, or any other policies within this plan. It instead builds upon national and other plan policies, and sets out further detail regarding what is required to ensure that all new development responds to the character of the local area, whilst allowing appropriate innovation or change. We also note the point made regarding conservation areas and conservation management plans/character studies. With or without an appraisal, management plan or character study, conservation areas all benefit from the same level of protection. We recognise the point made regarding improving the quality of design in areas of existing poor design. This policy requires new developments to reflect the positive features that make up the character and identity of an area, and therefore any poor features should not be reflected. Policy DE1 also ensures that all new development is of high quality design, which is of particular importance in areas that lack quality design.

Policy changes include:

- A reference has been included in the policy to the North Wessex Downs Colour Guide, in response to the North Wessex Downs National Landscape's representation.

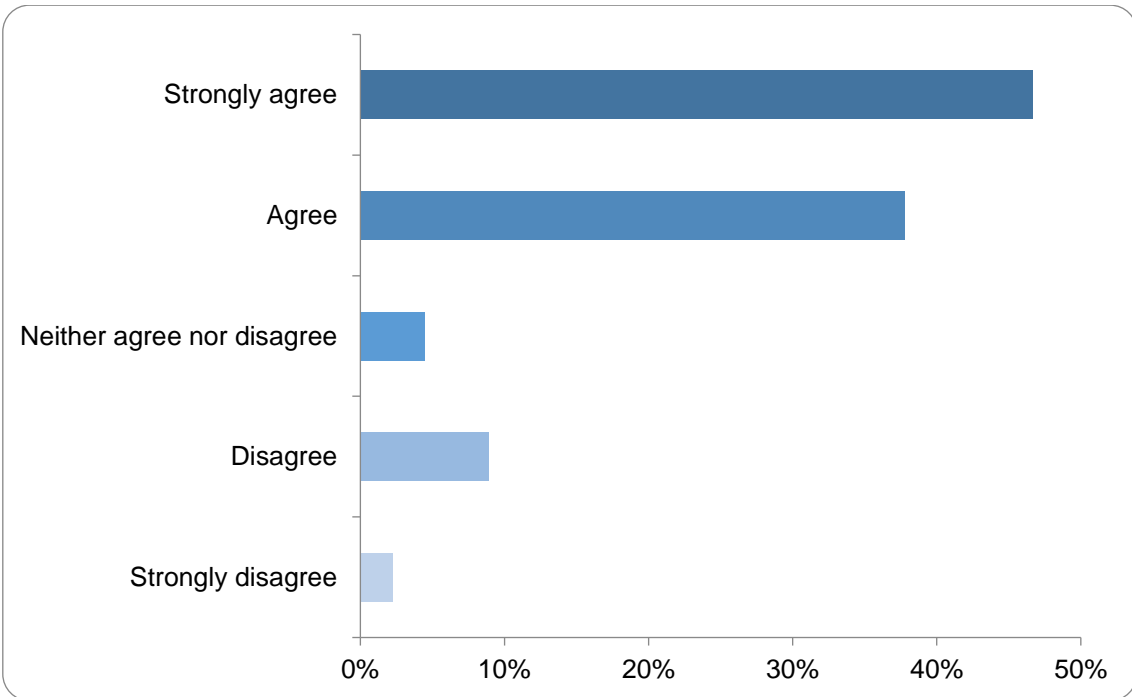
Policy DE3 – Delivering well-designed new development

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 90% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 45 people who responded to this question, 85% either agreed or strongly agreed with the proposed draft policy wording. 545 people did not answer.

Full Survey: Summary of main issues raised

- Support was given for Policy Option A, as well as the specific reference within the proposed policy text to neighbourhood plans, and the encouragement given to them to prepare design codes and masterplans.

- There were concerns raised that the level of engagement and review required by this policy option has the potential to slow down the delivery of development. A recommendation was made that the policy requires liaison committees to be set up at the beginning of an application, and consist of residents and their representatives, alongside a senior manager from the site developers.
- The requirement to consult with stakeholders during the planning process was welcomed.
- A concern was raised regarding the length of the policy, recognising that it was long with several criteria. A recommendation was made to include some of its contents in supporting text or design guidance.
- One respondent considered the policy to be addressed by others in the plan, notably Policy DE1 (High quality design), and/or a planning applications' validation checklist, and therefore questioned whether the policy was needed.
- Some respondents noted that it should be clarified what is meant by large scale development.

Historic England welcomed this policy.

Oxfordshire County Council welcomed Option A, particularly its inclusion of community engagement and promotion of innovative engagement methods. They recommended the policy references the OCC Street Design Guide and emerging Walking and Cycling Design Guidance, and also suggested that it may be more appropriate under policy section 1) d) to consider terminology that refers to blue and green infrastructure rather than SuDS specifically.

How the main issues have been taken into account

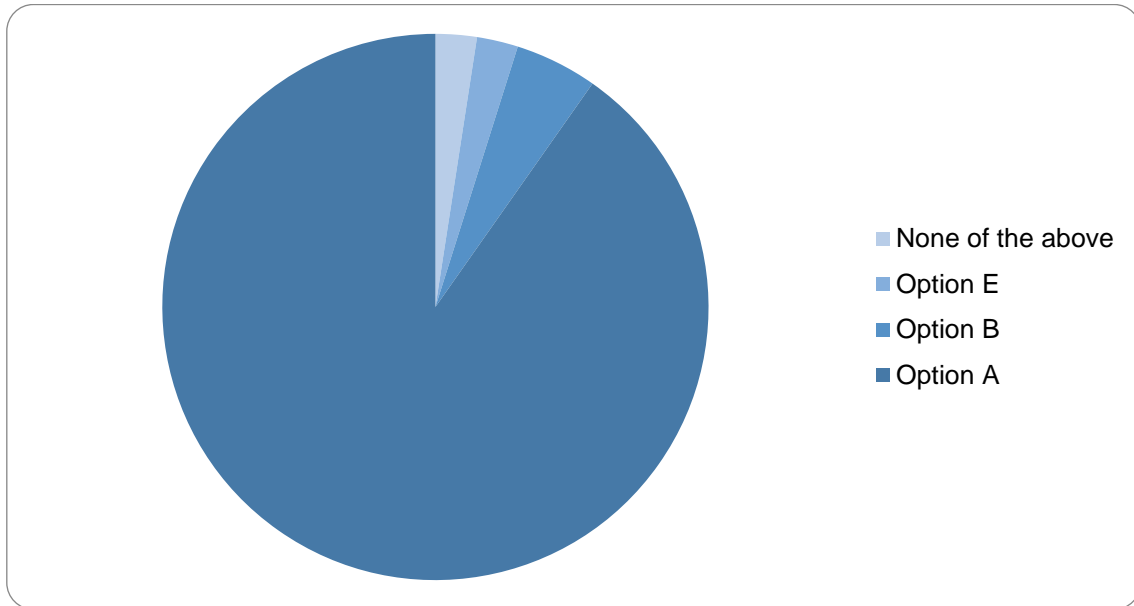
We recognise that the policy is lengthy and has some cross over with requirements set out in Policy DE1. However, we consider that the length of the policy is appropriate as it deals with numerous mechanisms for the delivery of well-designed new developments and has subheadings that help the policy to remain clear and easily understood. Some of its criteria may also cross over to Policy DE1, however it is not duplicating policy as it sets out necessary requirements for a masterplan, which Policy DE1 does not. We also note the point made regarding the level of engagement and review potentially slowing down the delivery of development. However, this engagement is consistent with national policy and guidance, which requires all design guides and codes to be based on effective community engagement (NPPF paragraph 134). We recognise the point made by Oxfordshire County Council, where they recommended that Part 1(d) of the policy refers to blue and green infrastructure. However, we are satisfied that Part 1(b) of the policy adequately requires green infrastructure provision to be set out, and that the definition of green infrastructure within the NPPF includes both green and blue spaces, so the reference to blue infrastructure is not necessary.

Changes made to the policy:

- We agree that the policy lacked a definition of large-scale major development, and therefore a definition has been added to the policy.

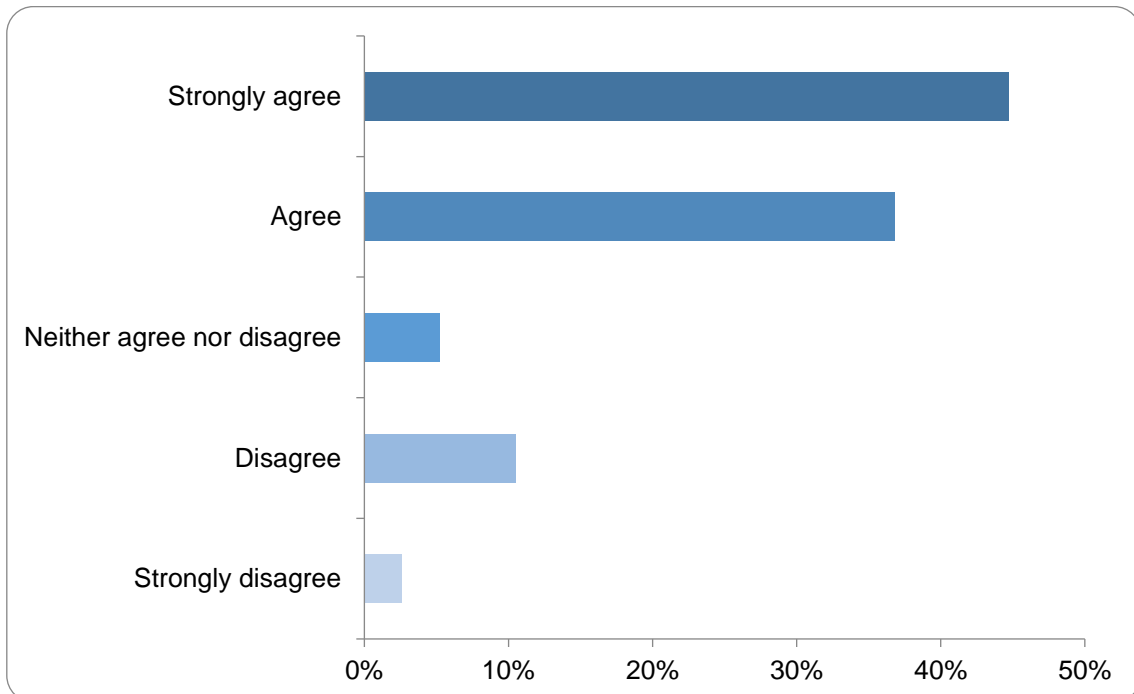
Policy DE4 – Optimising densities

Full Survey: Which option do you prefer?



Of the 41 people who responded to this question, 90% preferred Option A. 549 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 38 people who responded to this question, 83% either agreed or strongly agreed with the proposed draft policy wording. 552 people did not answer.

Full Survey: Summary of main issues raised

- Support was given for the aims of the policy in promoting an efficient use of land, with several respondents specifically favouring the flexible approach it takes to density.
- Some respondents did not support the approach of including a blanket minimum density figure and stated that developments should instead respond to the surrounding character and context of an area when establishing the correct density. On the other hand, another respondent recommended that the policy is more ambitious in terms of achieving higher densities and recommend that the policy set target density figures for different categories of development.
- One respondent raised that site specific constraints can influence a proposed density and recommended that the policy wording reflects this.
- Several respondents raised concerns with the concept of high-density development, and that it would result in small houses with insufficient space, or cause flooding or increased congestion.
- Alternatively, other respondents encouraged the policy wording to support higher densities, stating that Tier 3 and Tier 4 settlements can incorporate higher densities, such as through rows of terraced farm worker dwellings.
- A respondent considered that density should be led by the context of the immediate environment before it was considered according to its position in the settlement hierarchy.
- Some respondents noted that good design will ensure that higher density development is acceptable.
- Support was provided for taller buildings, but it was recognised that these may not be appropriate in more rural environments.
- The minimum density figures should allow for the incorporation of design considerations required by other plan policies, such as Policy DE6 (Outdoor amenity space), and Policy DE3 (Delivering well designed new development).

Historic England recommend adding reference to significance and setting in the welcome reference to heritage assets.

How the main issues have been taken into account

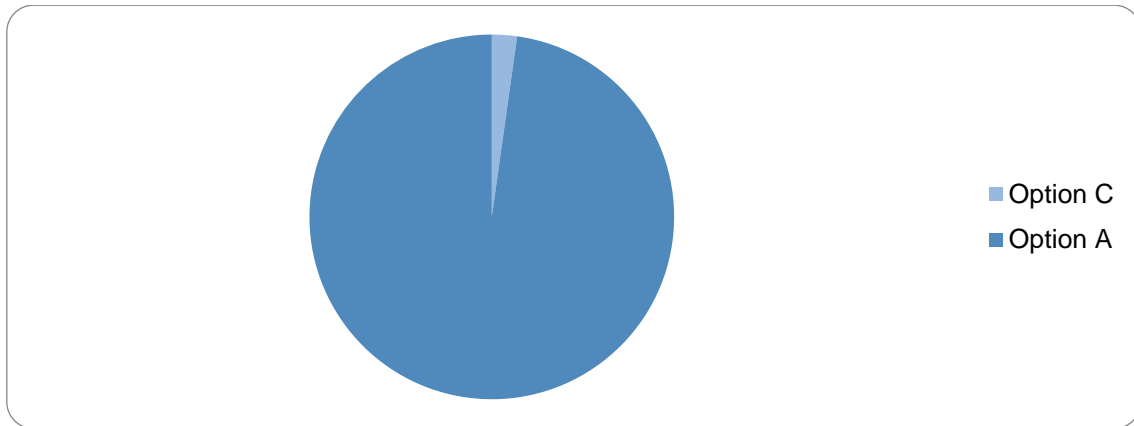
There was a mixed response to this policy, with some respondents considering that it does not go far enough in terms of promoting higher densities, whilst others considered it to be too inflexible, and should instead allow density to be decided on a case-by-case basis. We are satisfied that the policy strikes the right balance between ensuring that the density of development is reflective of its local context and character, whilst also requiring higher densities in appropriate areas of the districts, i.e. those in or close to well-connected towns that are highly accessible by cycling, walking and public transport. We note concerns regarding higher density developments, that they may create homes with insufficient space or cause flooding or increased congestion. However, the policy does allow for lower densities where there is clear conflict with delivering high quality design or other justified planning reasons, such as increasing flooding. There are also nationally described space standards which ensure that new homes are sufficient in size.

Policy changes include:

- In response to Historic England’s representation, the policy has been amended to add reference to significance and setting when referring to heritage assets at Part 2(c) of the policy.

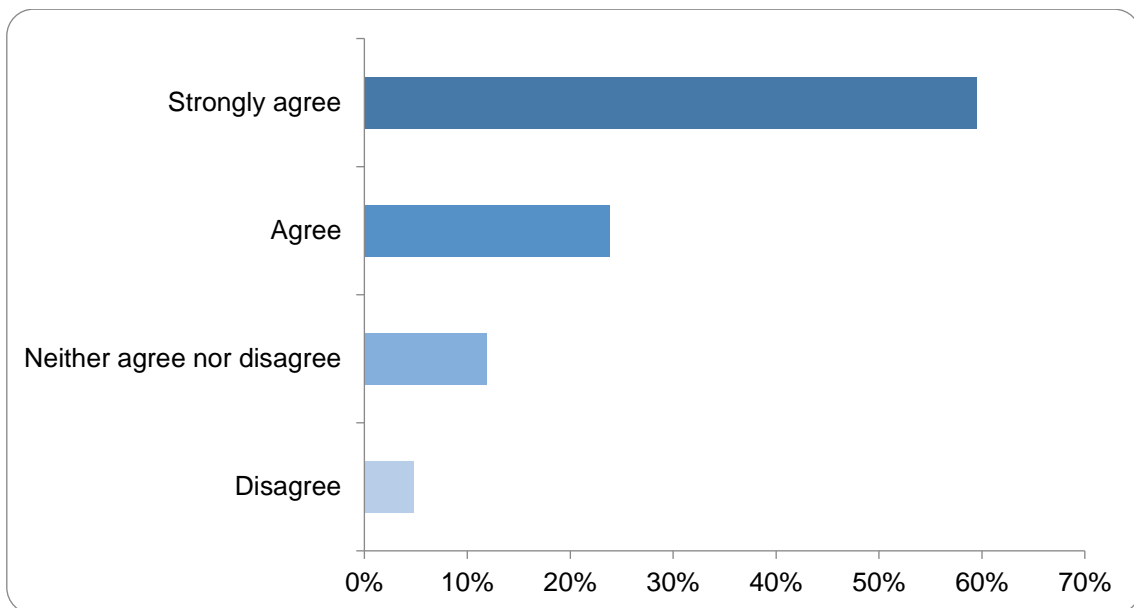
Policy DE5 – Neighbouring amenity

Full Survey: Which option do you prefer?



Of the 45 people who responded to this question, 98% preferred Option A. 545 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 42 people who responded to this question, 84% either agreed or strongly agreed with the proposed draft policy wording. 548 people did not answer.

Full Survey: Summary of main issues raised

- Support was expressed for Policy Option A, with respondents noting that neighbouring amenity is important to consider in planning applications.

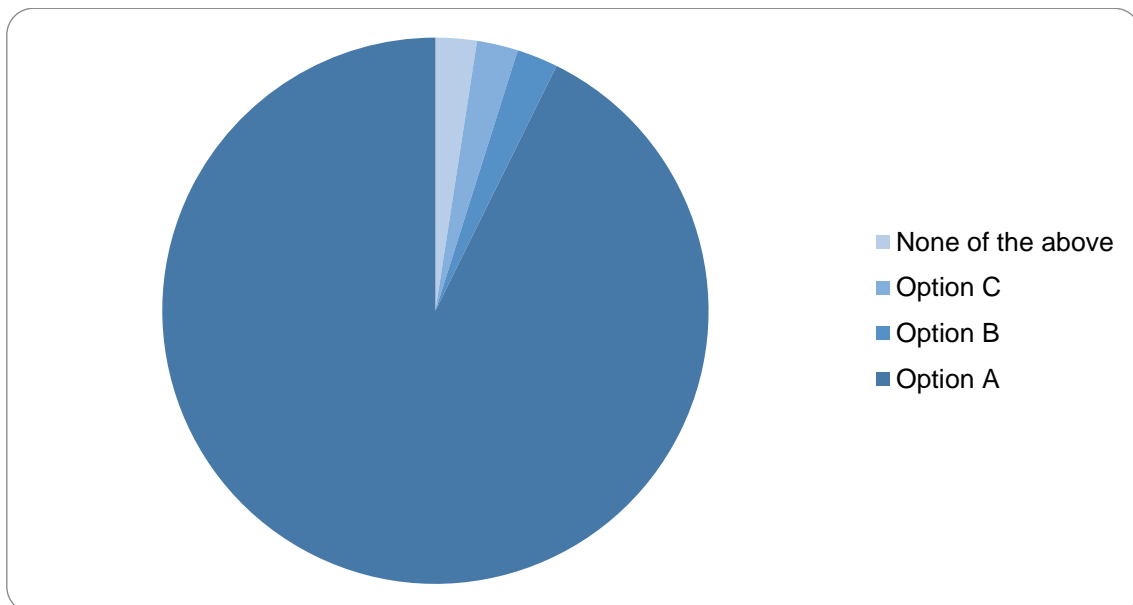
- A respondent noted that local people should be able to voice concerns regarding amenity when considering new developments.
- A recommendation was made that the policy include reference to construction management plans or restrictions on delivery and operational hours during the construction of new developments near sensitive areas.
- A respondent welcomed the reference to the impact of external lighting on the amenity of neighbours, but they noted this should be evaluated in the context of Policy CE11.

How the main issues have been taken into account

We understand the point raised regarding allowing local people to voice concerns regarding amenity when considering new developments and consider the planning application process to already allow this through the formal period of public consultation that takes place prior to the determination of an application. Regarding the recommendation for the policy to refer to construction management plans or restricted hours of delivery/operations, we are satisfied that this is adequately addressed through Policy IN6 (Deliveries and freight), which already sets out requirements for this. We agree with the last point made that noted that the impact of external lighting should be evaluated in the context of Policy CE11 (Light pollution and dark skies). As the plan is to be read as a whole, we are satisfied that any external lighting impacts that relate to amenity will consider Policy CE11 in the assessment of a planning application.

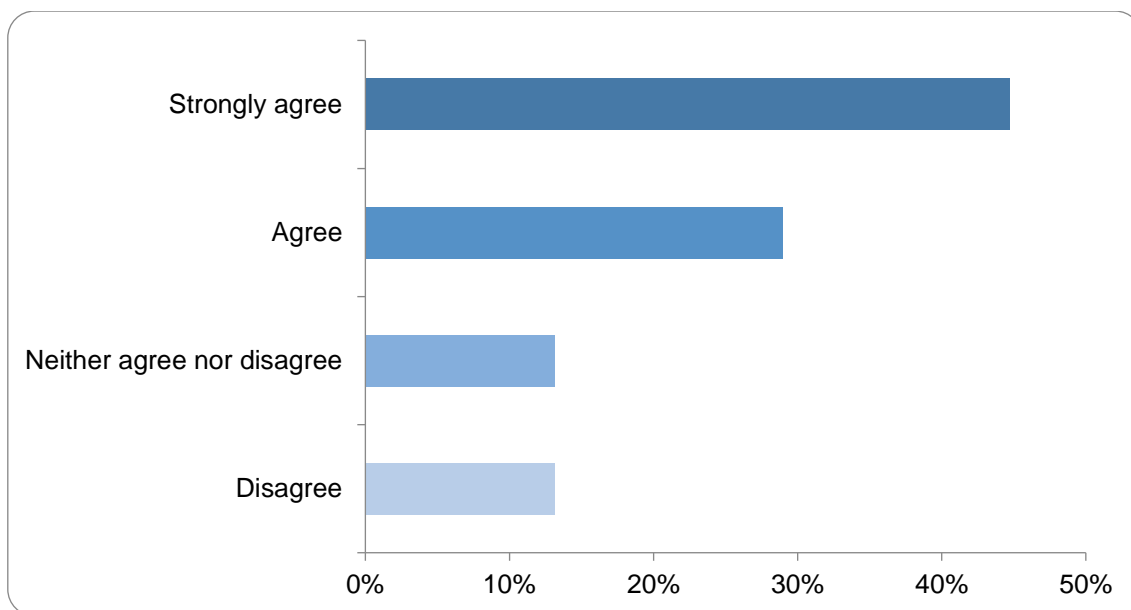
Policy DE6 – Outdoor amenity space

Full Survey: Which option do you prefer?



Of the 41 people who responded to this question, 93% preferred Option A. 549 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 38 people who responded to this question, 74% either agreed or strongly agreed with the proposed draft policy wording. 552 people did not answer.

Full Survey: Summary of main issues raised

- There was broad support for Policy Option A, with respondents noting that it is important for residents health and well-being.
- Concerns were raised that this policy is in conflict with Policy DE4 (Optimising densities), as they considered delivering higher densities would reduce the size of outdoor amenity space that is provided on new developments.
- The issue of the ownership of non-private amenity spaces on new developments was raised, and it was recommended that all new public amenity space should be adopted by the relevant parish council or district/county council.
- One respondent was concerned that the policy could increase the cost of properties, and therefore make new homes more unaffordable.
- Another respondent noted that they supported the policy, as long as it did not create private outdoor amenity space from greenfield land.
- A respondent recommended that policy text includes wording relating to nuisance from leaf fall that can create pressure to cut back large trees which are an important landscape feature.

Oxfordshire County Council recommended that the draft policy is revised to include reference to opportunities for food growing and the need for space for clothes drying. They noted how these references were already included in introductory text but wished for them to also be within policy text.

How the main issues have been taken into account

We recognise that the need for outdoor amenity space (as well as other policy requirements) will need to be balanced against the requirements of Policy DE4 (Optimising densities). However, we are satisfied that the policy requires sufficient space to be provided, which will be determined by the size of the dwelling and its

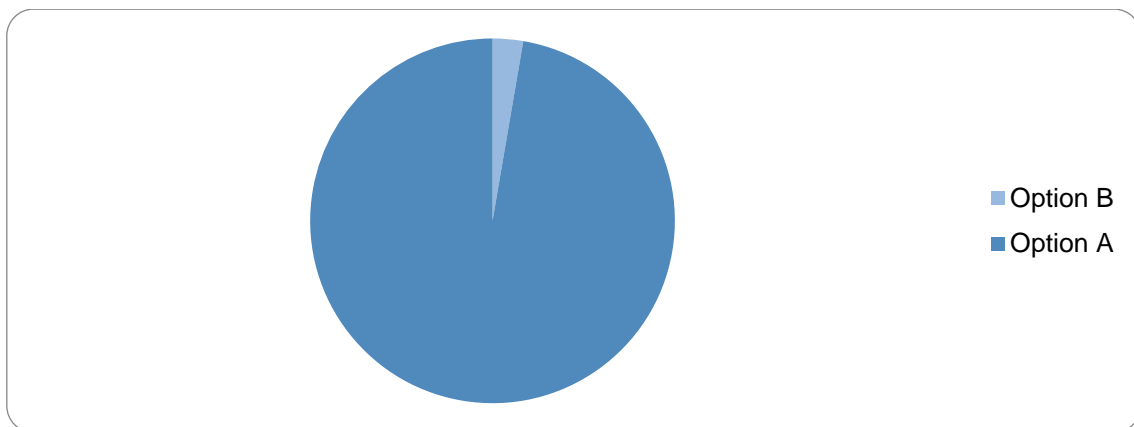
surrounding character. We also do not consider this policy will notably make properties more unaffordable, particularly given it has been a longstanding policy in the districts for many years. The issue of ownership of non-private amenity space is outside the remit of planning but noted by the councils. We note Oxfordshire County Council's recommendation to include reference to opportunities for food growing and the need for space for clothes drying in policy text. However, we think that these references are most appropriate to include within supporting text, allowing the policy to be kept concise with further context set out in supporting text.

Policy changes include:

- In reflection of the representations, the policy has been amended to ensure outdoor amenity space is not compromised by existing established significant trees and hedges and their associated leaf litter, that would lead to future pressure to prune or remove these landscape features.

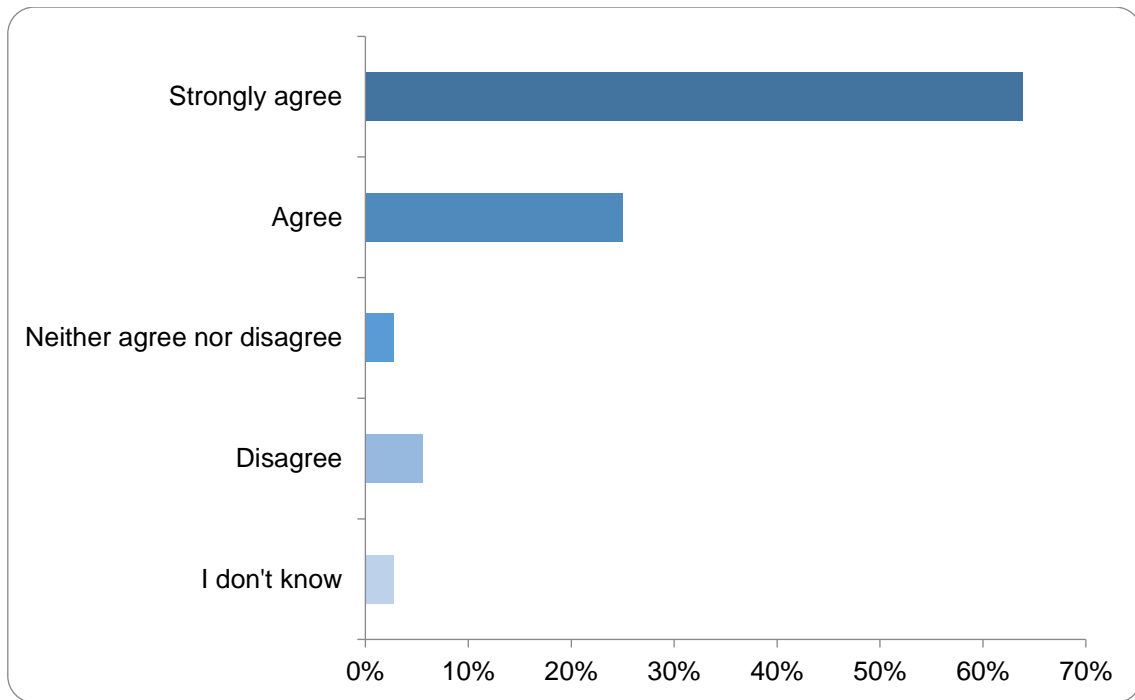
Policy DE7 – Waste collection and recycling

Full Survey: Which option do you prefer?



Of the 37 people who responded to this question, 97% preferred Option A. 553 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 36 people who responded to this question, 89% either agreed or strongly agreed with the proposed draft policy wording. 554 people did not answer.

Full Survey: Summary of main issues raised

- Support was provided for Option A.
- A recommendation was made that the policy mentions the importance of streets being attractive and require them to be regularly maintained to ensure they remain clean.
- One respondent noted the importance of educating people about the environmental benefits of recycling and raised that existing recycling centres within the plan area should be maintained.
- One respondent suggested that the policy could be strengthened with more on composting.

Oxfordshire County Council consider that Part 5 of the proposed policy should be amended to reference the county council’s Waste and Circular Economy Team in terms of early engagement to discuss potential innovative waste collection and recycling proposals.

How the main issues have been taken into account

The issues raised in relation to this policy were generally outside of the remit of planning, for example keeping streets clean and educating people about recycling. The point raised regarding composting is also too specific to be included in policy and is not something planning can set requirements on. The policy instead ensures that on all new developments there are adequate facilities for the sorting, storage and collection of waste and recycling, rather than setting specific requirements on the type of recycling undertaken, or how streets are maintained.

Policy changes include:

- In response to Oxfordshire County Council's representation, wording has been added to ensure the county council's Waste and Circular Economy Team are consulted on innovative recycling and waste collection and management proposals.

Other general comments regarding Chapter 10: Well designed places for our communities

Full Survey: Summary of main issues raised

- Some respondents suggested that elements of design should be reserved to neighbourhood levels.
- One respondent suggested the majority of the chapter should be removed and put into the design guide.

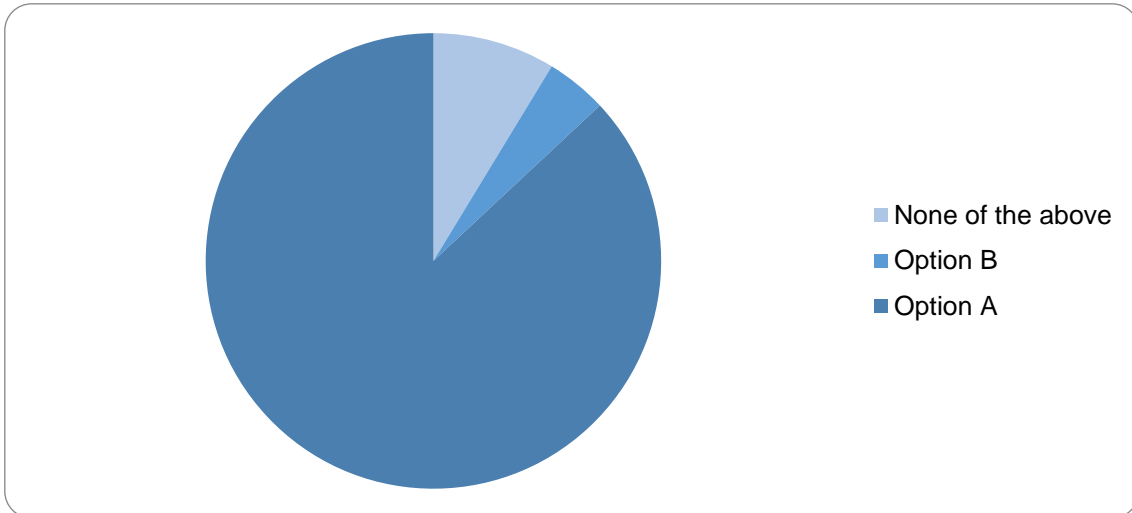
How the main issues have been taken into account

Policy DE3 (Delivering well-designed new development) already encourages neighbourhood plans to prepare design codes and masterplans. While the Joint Design Guide is a material consideration in the determination of planning applications, we consider it is still necessary for the Joint Local Plan to include design policies.

Healthy places

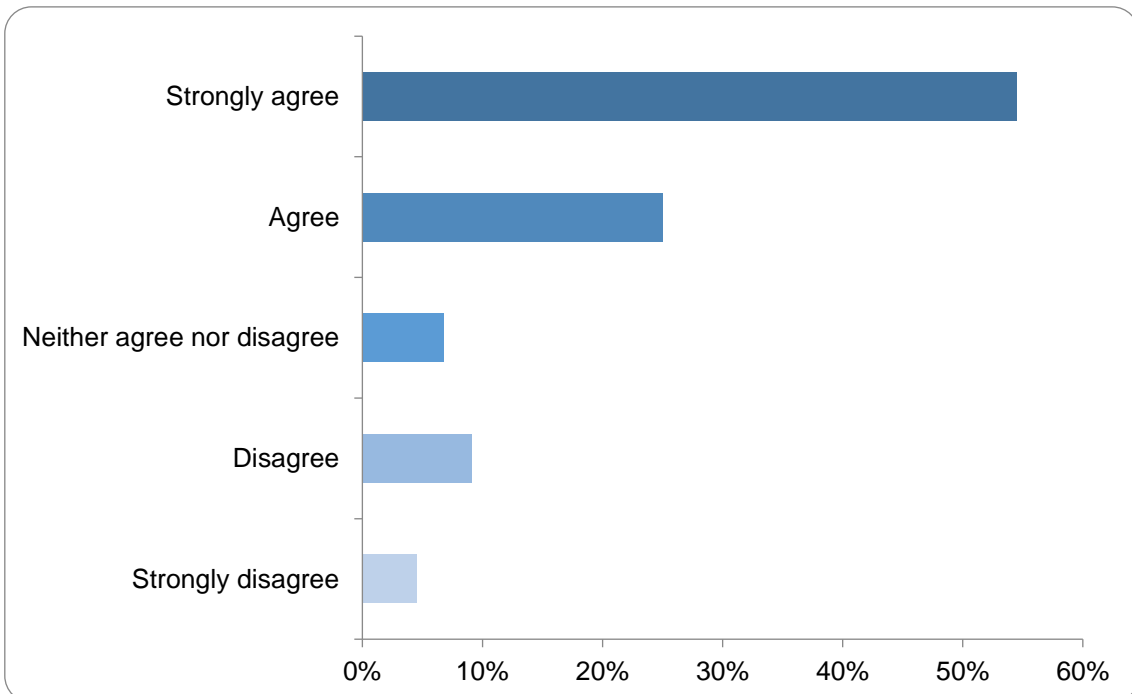
Policy HP1 – Healthy place shaping

Full Survey: Which option do you prefer?



Of the 46 people who responded to this question, 87% preferred Option A. 544 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 44 people who responded to this question, 80% either agreed or strongly agreed with the proposed draft policy wording. 546 people did not answer.

Full Survey: Summary of main issues raised

- Support was provided for Policy Option A, with respondents welcoming the consideration of health and wellbeing in planning applications.
- Some concerns were raised regarding the enforceability of Policy Option A, and Health Impact Assessments (HIAs) generally.
- A recommendation was made that applications for specialist housing for older people would not be required to submit a HIA, due to the fact these schemes already deliver a number of health benefits.
- Specific recommendations were made regarding the scope of HIAs themselves, such as ensuring they consider both physical and mental health, that they use the index of deprivation in their assessments, as well as the World Health Organisation HIA assessment form.
- Some respondents considered the proposed policy requirement for the submission of a HIA would not be needed if a HIA of the plan is undertaken. They state that this is because the whole plan HIA would have already addressed the key health issues for an area and reflected these within the Local Plan policies.
- Some respondents considered HIAs to be burdensome, costly and time consuming, and considered other plan policies to sufficiently address health and wellbeing.
- A respondent welcomed wording in the policy that requires the HIA to be proportionate to the scale of development proposed.

Oxfordshire County Council welcomed the inclusion of this policy and considered it vital that Health Impact Assessments become routine practice for any major development. In terms of policy text, they recommended that the term ‘rapid’ is omitted prior to HIA, as for some large-scale developments a comprehensive HIA may be required. They also suggest the wording that refers to the scale at which the HIA is undertaken should also address this point.

Thames Water, Affinity Water and Southern Water noted that where developments also require EIA, the principals of HIA can form part of that process.

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) supported this policy in general and considered it vital that HIA become routine practice for any development which are likely to have a potentially significant health impact in relation to either its use and/or location. They also expressed concerns about the consultation engagement process with planning applicants for the HIA and welcome further discussion with the Councils regarding this matter.

NHS (Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board) gave support to Option A.

How the main issues have been taken into account

We recognise that some respondents consider health impact assessments (HIAs) to be burdensome, however we are confident that they are a necessary mechanism to ensure that health and wellbeing is a key consideration in new development proposals. We do not agree with the point raised that HIAs are not needed at the planning application stage because a health impact assessment has been conducted

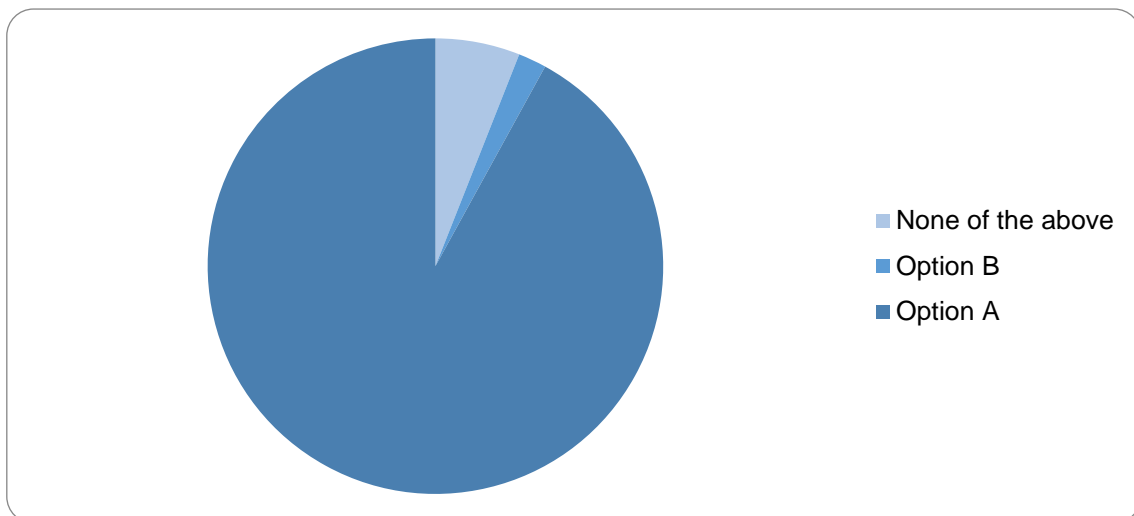
of the Joint Local Plan. The HIA of the Joint Local Plan was conducted at a district wide scale, and its purpose was to assess the plan and its policies. Therefore, it does not provide enough detail to make assumptions at a granular planning application level, where key health issues at the ward level will need to be assessed. We also note the recommendation to allow applications for specialist housing for older people to not submit a HIA, due to the health benefits their development will provide. However, we still consider it necessary for all major applications to submit a HIA with no specific exceptions, as although we agree that specialist housing for older people will likely bring health benefits to some members of the community, these developments should still undertake an assessment of their health impacts to ensure they maximise any positive health impacts and minimise any negative impacts.

Policy changes include:

- In response to Oxfordshire County Council’s representation, we have removed the reference to ‘rapid’ when referring to HIAs. We agree that the policy already includes sufficient wording that addresses the scale of the HIA, as the policy states it should be ‘proportionate to a proposed development’.

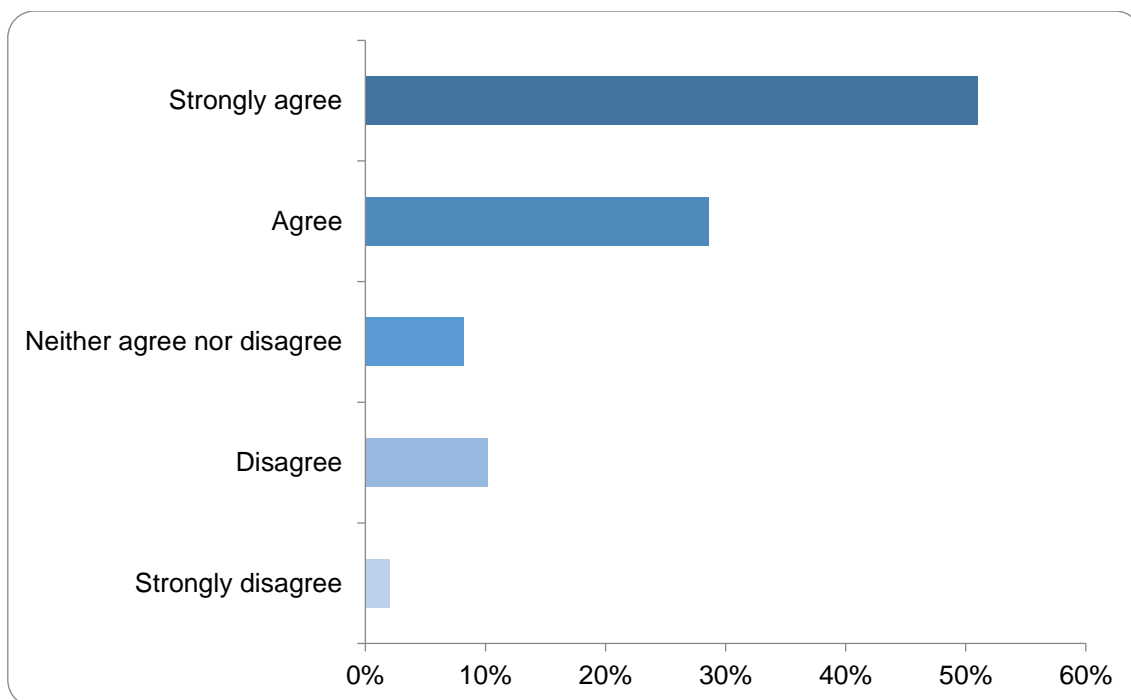
Policy HP2 – Community facilities and services

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 92% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 49 people who responded to this question, 80% either agreed or strongly agreed with the proposed draft policy wording. 541 people did not answer.

Full Survey: Summary of main issues raised

- We received a variety of comments on specific community infrastructure items or themes as follows:
 - A community facility is needed in Wallingford
 - The policy should consider the issue of the loss of pubs, healthcare facilities, pharmacies, and community health facilities as community facilities
 - The policy should reference the shortages of nursery staff.
- We received support for requiring viability assessments of existing facilities before consenting their loss, however some concerns were raised about how these could be independently carried out on behalf of developers.
- Many respondents suggested that the policy should address the shortfall of existing facilities, and provide a framework for all development proposals to contribute to addressing the shortfall. The policy should consider including a threshold for all developments over a certain size to provide community facilities. Comments on this specifically related to Botley.
- One comment stated that the policy shouldn't protect facilities solely on the basis that they are the only one of a type of that facility in their area as they may not be utilised.
- We received comments welcoming the policy wording around requiring new or extended community facilities to be accessible and inclusive for disabled people.
- Some comments requested that the policy define the robust criteria that allow the loss of a community facility as set out in the supporting text. Some referenced experiences of amenity facilities being left to fall into disrepair to

gain consent for redevelopment, while others suggested that the test of “essential” is overly onerous.

- One comment requested that the wording of this policy should be amended to provide flexibility for existing community facilities to expand that are outside Tier 1 to 4 settlements. Furthermore, it may not always be necessary – nor appropriate – for extensions to existing community facilities to comply with Part 4(b) to (g). The wording of this policy should be amended to provide greater flexibility in its application. Furthermore, a comment stated that not allowing development in lower tier settlements will contribute to the financial instability of community facilities in these locations, while Policy HP2 would restrict their conversion to other uses. The policy is too restrictive and will prevent smaller settlements improving.
- One comment stated that Neighbourhood Plans should be given more consideration/prominence, before making decisions on community facilities and services.
- The Campaign for Real Ale recommended the policy includes an additional criterion for public houses as guided by the Community Facilities Viability Assessment. They also stated that the policy should include an additional paragraph (4) “If the facility is registered as an Asset of Community Value then the Council will regard this as a material consideration in the determination of any planning application affecting the facility. The Council will also expect to see evidence of discussion with the local community of the potential for a community enterprise.”.
- Thames Water, Affinity Water and Southern Water requested that this policy is amended to acknowledge that F2 uses, including outdoor sport and recreation, would be supported where they are associated with major national infrastructure.
- One comment stated that policy should link to stewardship policies.

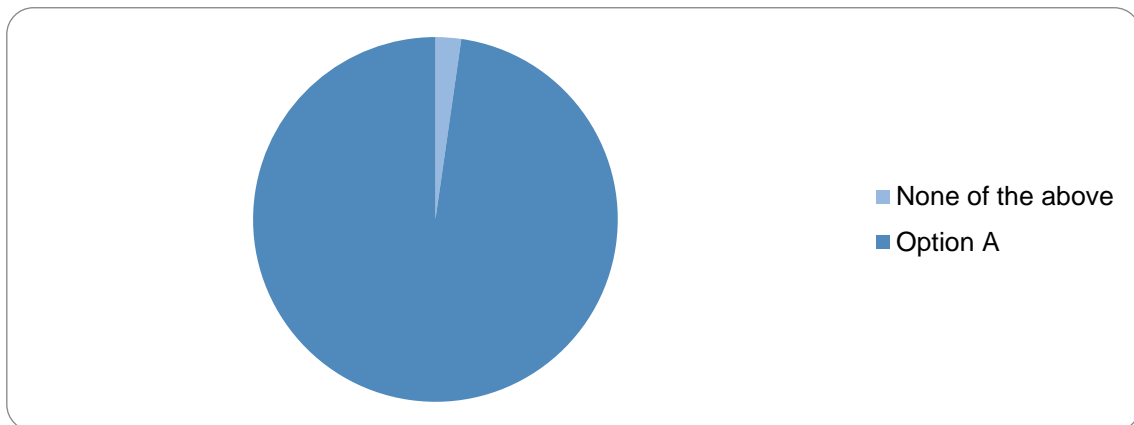
Oxfordshire County Council raised several points on this policy. They commented that the proposed wording may limit their ability to restructure the education estate and dispose of redundant education land and buildings. They supported the aspiration that school facilities are available for community use, any policies would need to be carefully worded to ensure they are deliverable. Any school's primary function must be the education and safeguarding of their pupils, which will provide constraints on the type of facilities provided. However, given that any new schools would be expected to be academies, and these operate independently of council control, it is not possible for the council to require these to deliver community use. The county council also recommended that a separate ‘Education facilities and provision’ policy is created and included within the Regulation 19 version of the Joint Local Plan. This would allow for the different needs and requirements of education facilities/provision compared to other community facilities to be adequately considered and addressed. Finally, they commented that the policy needs to make clear that all Public Rights of Way are protected, regardless of the number and location of them.

How the main issues have been taken into account

We have split the part of the policy that was dealing with “new or extended” facilities into two parts, so now the policy has subsections on both proposals for existing facilities, and proposals for new facilities. This allows the policy to be more permissive when dealing with applications to extend existing facilities, without considering where they sit in the settlement hierarchy (Policy SP2). We have removed specific reference to the need for independent verification of evidence to justify the loss of a community facility, and instead provided some additional context for how we will deal with such evidence in the supporting text and added a new appendix to the plan with guidance (Appendix 6: Advisory Note on Seeking Marketing and/or Viability Evidence from Applicants). We have also introduced some minor changes to the criteria for justifying a loss of a facility. We believe that collectively these changes address the comments from Oxfordshire County Council. We have also included references to assets of community value in the policy, confirming the councils will treat this as a material consideration when determining planning applications.

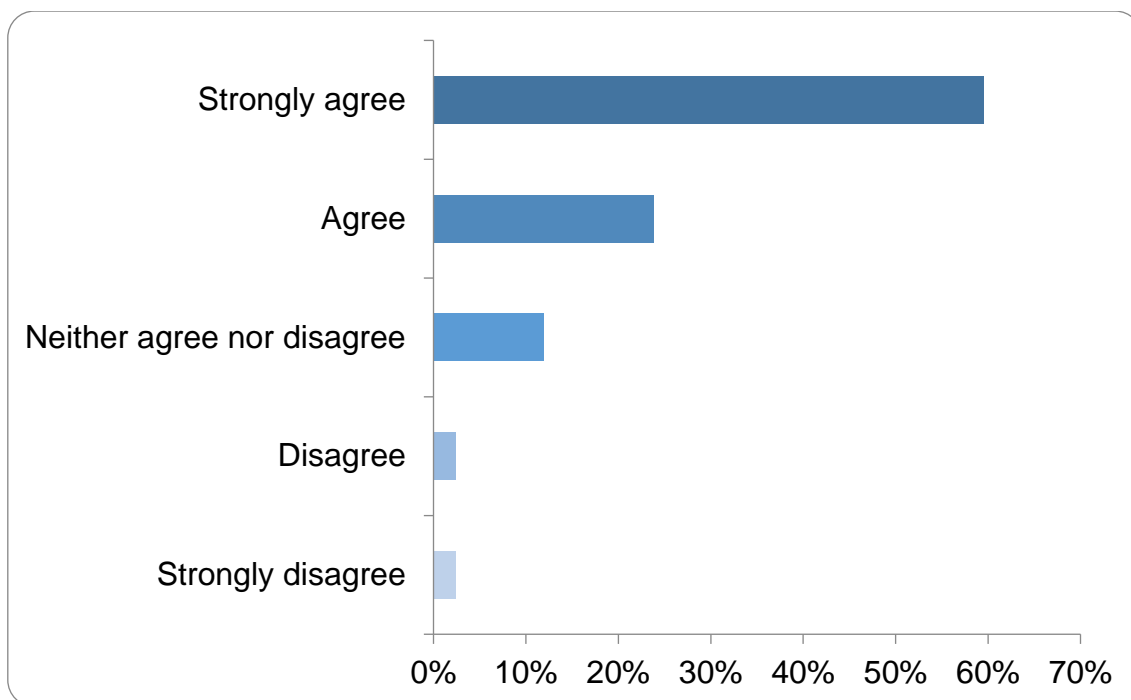
Policy HP3 – Health care provision

Full Survey: Which option do you prefer?



Of the 44 people who responded to this question, 98% preferred Option A. 546 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 42 people who responded to this question, 84% either agreed or strongly agreed with the proposed draft policy wording. 548 people did not answer.

Full Survey: Summary of main issues raised

- The policy should ensure that development addresses the shortfall in existing healthcare provision in an area. Specific commentors identified shortfalls in healthcare provision at Botley, Crowmarsh Gifford, Wallingford, and Uffington.
- The policy should consider encouraging the provision of satellite healthcare facilities in rural areas, and preserve these facilities where they already exist.
- The policy should require the delivery of healthcare facilities before the development takes place.
- The council should levy a tax on developments over a threshold that will go towards the funding of training for new medical staff.
- The policy does not currently recognise that Vale is covered by two Integrated Care Boards.
- The policy should include pharmacies.
- The policy needs to identify what "appropriate, detailed and robust evidence" is required to allow for the loss of a health facility.
- The council should consider rewording Part (c) "in the case of commercial services, it is no longer economically viable". This is because almost all NHS services are operated by separate commercial businesses. There is a danger that although there is need for certain health care provision it is deemed not economic and provision therefore inappropriately removed.
- Neighbourhood Plans should be given more consideration, to help ensure health care provision meets the needs of all residents and to protect the loss of health care facilities.
- The estates agenda for GP practices is very complex and the policy would benefit from additional detail.

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) welcomed this policy in general and suggested the draft wording of Part 1 divided into two parts, namely (1) the provision of new facility and (2) the improvement and expansion of the existing facility. The policy should require developers to engage with the ICB during pre-application discussion in any new GP facility proposal and require the commissioning of any feasibility studies of the new GP facility OR the improvement and expansion projects of existing GP premises.

NHS (Bath and Northeast Somerset Swindon and Wiltshire Integrated Care Board) supported the provision of sufficient, quality, and accessible healthcare facilities. However, they are concerned with the policy's proposed requirement to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision. They state that this adds unjustified delay to vital reinvestment in facilities and services for the community and contradicts their own requirements to find best value (open market value) for their assets.

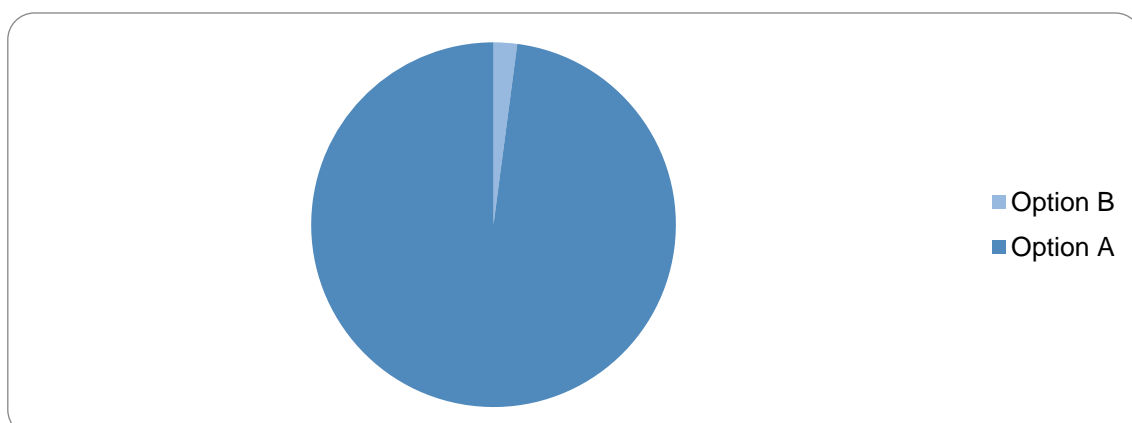
Oxfordshire County Council supported Option A and the proposed policy wording that refers to support for new, replacement, expanded or upgraded health care facilities which are accessible through active, sustainable travel. They welcome reference to the need for any change or loss of provision to be determined to the satisfaction of the local planning authority in consultation with Public Health and the ICB.

How the main issues have been taken into account

Many of the issues about healthcare were concerns about the capacity of existing health infrastructure to accommodate the rise in population. The Infrastructure Delivery Plan (IDP) sets out the healthcare improvements needed from new development to mitigate its impact on healthcare. Development cannot mitigate existing shortfalls in healthcare provision as this would conflict with Regulation 123 of the Community Infrastructure Levy (CIL) Regulations 2010. The policy has been amended to support the improvement, expansion and upgrade of existing GP surgeries, dentists, and hospital facilities regardless of their location in the settlement hierarchy.

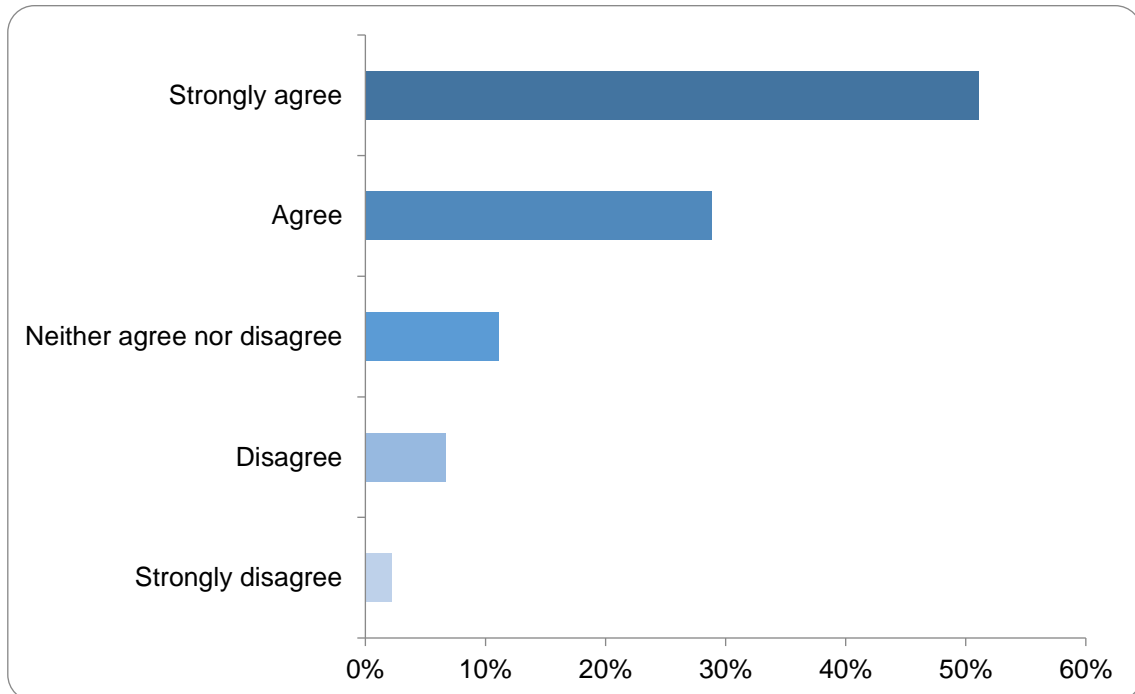
Policy HP4 – Existing open space, sport and recreation facilities

Full Survey: Which option do you prefer?



Of the 48 people who responded to this question, 98% preferred Option A. 542 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 45 people who responded to this question, 80% either agreed or strongly agreed with the proposed draft policy wording. 545 people did not answer.

Full Survey: Summary of main issues raised

- The policy should reference provision for the permanent long-term maintenance of open space and resist the transferring of land to management companies. The councils should incentivise town and parish councils to take on the management of open space from new developments. The policy should reference CIL and Section 106 funds as a way of achieving the aims of the policy.
- The councils should be aware that this policy overlaps with Policy AS15 (Harcourt Hill Campus) and the open space provision there.
- The policy should recognise that some green spaces will be under more pressure for development than others and specifically protect those which are. Specific examples included Ladygrove Park in Didcot, and the green spaces on the Great Western Park development. The councils should consider designating such spaces as Local Green Space, to afford them the same level of protection as Green Belt.
- Where development impacts open space, the developer should include similar facilities near to, or within the site. The policy should emphasise that all developments should seek to improve the green infrastructure provision and biodiversity value of existing open spaces. The policy should also include protection for Public Rights of Way, as well as ensuring consideration is given

to opportunities to enhance or upgrade them, using equestrian friendly surfaces for bridlepaths and consider access to the countryside.

- The policy should recognise existing shortfalls in open space, sport and recreation provision and does not identify the need for new open space required by new development. Comments on this specifically related to Botley.
- The policy should avoid double counting public open space and sustainable drainage systems (SuDS). Public open space and school playing fields that are inaccessible when it rains are not suitable provision.
- The criteria demonstrating that the open space is surplus to requirement is subjective, and could lead to lesser used, but still important open space, being lost.
- The policy should include reference to NICE guidelines on Physical Activity and The Environment (2018).
- One comment argued that the policy is too focused on protecting existing facilities and does not provide a sufficient framework for delivering new/enhanced facilities.
- The Campaign to Protect Rural England argued that the policy lacks protection for public rights of way. It should state that if development will include current PRowWs they are enhanced and opportunities must be taken to improve them, upgrade their status, and if bridleways use an equestrian friendly surface.

Sport England supported the policy but would suggest Part 3 is amended as follows “any replacement provision should be subject to equivalent or better accessibility and management arrangements as well as meeting other policies in this plan with special reference to Policies CE1, 2, 5 and 7 and where possible made available before the existing provision is lost.”

Oxfordshire County Council supported the proposed policy wording that seeks to protect existing open space, sport and recreation facilities from development. They state that it is particularly important that open space is included in this policy as it provides opportunities for informal play, essential to children’s health and wellbeing. They do however consider that an additional criterion is added to the policy as follows: ‘adequately assess and mitigate impact upon areas of archaeological interest’, and that the policy makes reference to protecting Public Rights of Way.

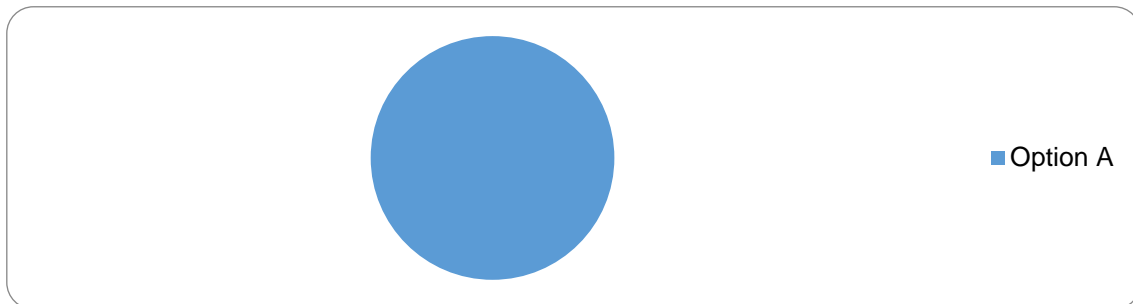
How the main issues have been taken into account

We have included a clause in the policy to require applicants to demonstrate how the facilities will be owned and maintained in the long term. We did not include specific requests for cross references to other policies or topic areas (such as archaeology) as the JLP contains other policies to address these. We have not included references to specific areas of open space that some felt were under the most pressure for development. The policy protects all open spaces equally, and we did not want to introduce a perceived weakening of the protection of some open spaces by stating they are under less pressure than other spaces, especially this can change over time. The policy already includes a requirement for alternative provision to be of equal or better quality, and other policies in the plan cover matters of

biodiversity (Policy NH2) and green infrastructure (Policies HP6 and HP7). As with comments on other policies dealing infrastructure provision, the policy cannot require development to address existing shortfalls in provision as this would conflict with Regulation 123 of the Community Infrastructure Levy (CIL) Regulations 2010.

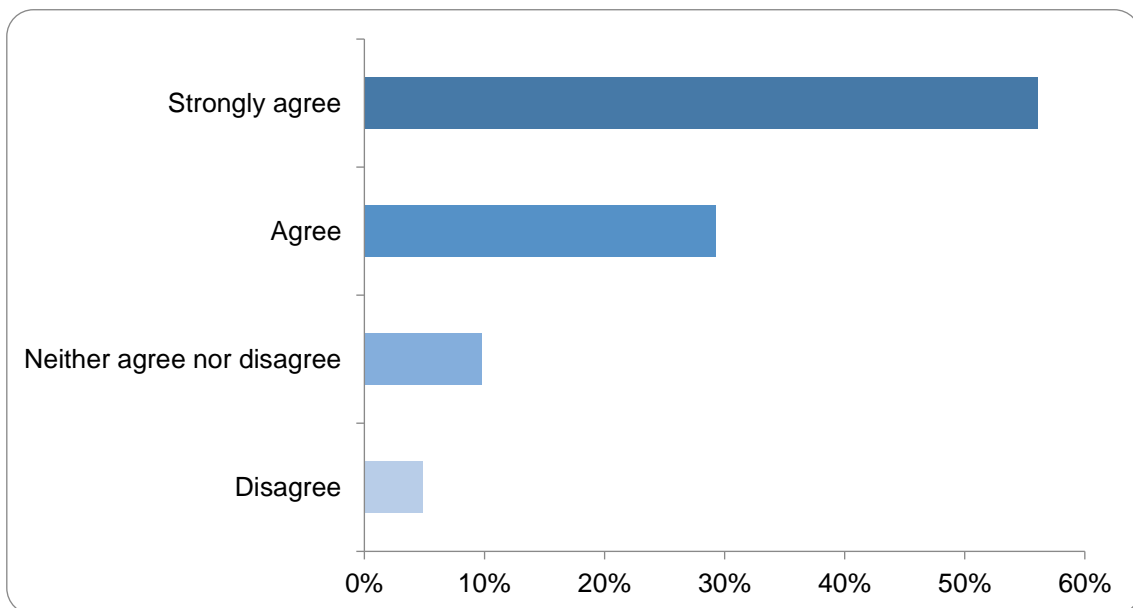
Policy HP5 – New facilities for sport, physical activity and recreation

Full Survey: Which option do you prefer?



Of the 45 people who responded to this question, 100% preferred Option A. 545 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 41 people who responded to this question, 85% either agreed or strongly agreed with the proposed draft policy wording. 549 people did not answer.

Full Survey: Summary of main issues raised

- The policy should recognise the need for more all-year-round pitches in Oxfordshire.
- The policy should consider the opportunity for using brownfield sites for sport provision. Conversely, another comment stated that the policy should not restrict the expansion of non-brownfield sports and leisure facilities.

- The policy should reference provision for the permanent long-term maintenance of open space, and resist the transferring of land to management companies. The councils should incentivise town and parish councils to take on the management of open space from new developments. Similarly, a comment was supportive of collocating sports and leisure facilities with schools to allow shared use and maintenance.
- The policy should ensure new facilities are within the community the development is located in, and need to ensure the facilities are accessible by active transport.
- The policy should recognise existing shortfalls in open space, sport and recreation provision and does not identify the need for new open space required by new development. Comments on this specifically related to Botley.
- The policy should also include protection for Public Rights of Way and consider access to the countryside.
- The policy needs to be enforced properly to ensure viability concerns aren't used as a loophole for providing facilities.
- The policy should include reference to athletics facilities.
- The policy should ensure that open space and leisure provision (both new and existing) is accessible for all (including those accessing via wheelchair). Facilities should also include access to toilets.
- Sport England is very supportive of this policy.
- The policy should emphasise greater support for use of natural and sustainable and/or recycled materials and surfaces rather than artificial where possible.
- The Campaign to Protect Rural England requested that Green Belt considerations must be specifically included in this policy.
- Some comments the policy should explicitly support community led sports and recreation organisations and clubs, i.e. explicitly recognising their public benefit.
- Thames Water, Affinity Water and Southern Water - SESRO intends to provide new facilities for recreation which will be a significant benefit to the local community. However, draft Policy HP5 is restrictive through only allowing new facilities within or adjacent to settlements, or the provision of small-scale recreational facilities in the countryside. It is recommended that the wording of draft Policy HP5 is amended to reflect that such open spaces could come forward as part of a major piece of national infrastructure.
- One comment stated that the policy will help achieve new facilities but it is an unworkable policy expanding existing facilities.

Historic England recommend adding reference to significance and setting in the welcome reference to heritage assets.

Oxfordshire County Council reiterated points they raised for Policy HP2 (Community facilities and services) regarding the use of school sites for community use leisure/sport/recreation uses. They again stated that dual use of new school facilities cannot therefore be required by the planning system at S106 stage because at the point of a new school being planned, the academy trust which will be the

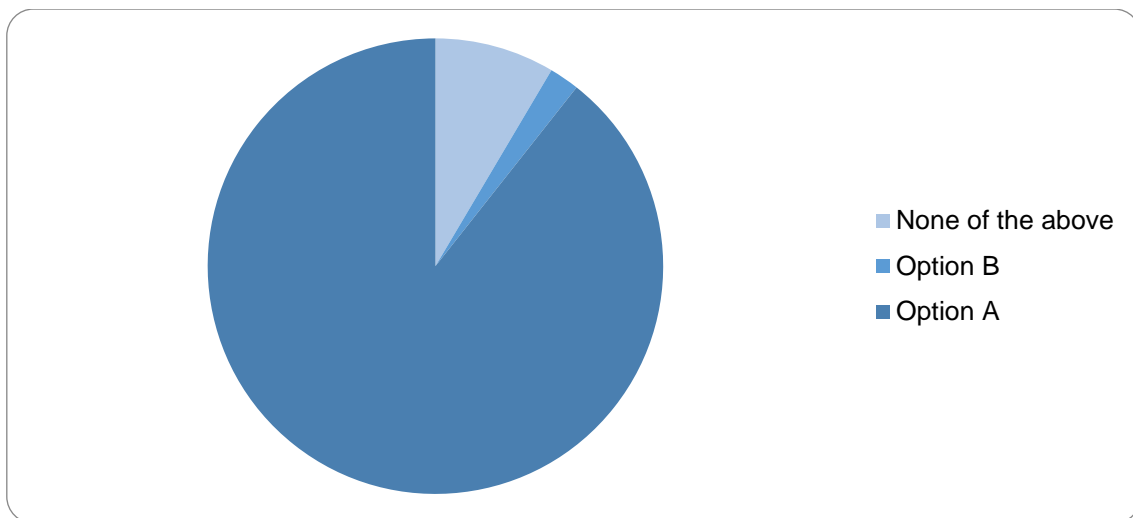
responsible body for the school is not yet known; and the County Council cannot enforce community use upon an academy. They also recommended that two new criteria are added to the policy: (1) requiring new and enhanced facilities to be accessible and affordable for deprived communities, and (2) requiring proposals to adequately assess and mitigate impact upon areas of archaeological interest.

How the main issues have been taken into account

We have included a clause in the policy to require applicants to demonstrate how the facilities will be owned and maintained in the long term, with supporting text encouraging new facilities to be transferred to town and parish councils over management companies. The county council's comments about shared facilities is not required, and it can only continue to encourage dual use where it is possible. Many comments on this policy were about the detail of the type of sport provision needed in this district. This policy doesn't reflect this level of detail, with this being addressed in our Leisure and Playing Pitch Strategies. We did not include specific requests for cross references to other policies or topic areas (such as archaeology, Green Belt, construction materials, and heritage assets' setting) as the JLP contains other policies to address these. As with comments on other policies dealing infrastructure provision, the policy cannot require development to address existing shortfalls in provision as this would conflict with Regulation 123 of the Community Infrastructure Levy (CIL) Regulations 2010.

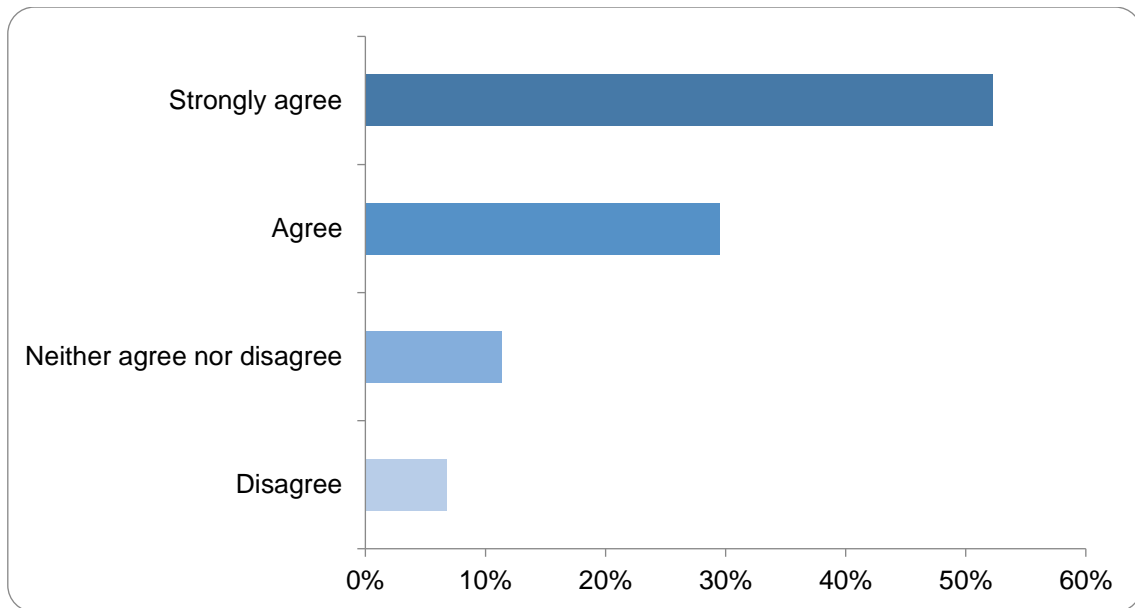
Policy HP6 – Green infrastructure on new developments

Full Survey: Which option do you prefer?



Of the 47 people who responded to this question, 89% preferred Option A. 543 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 44 people who responded to this question, 82% either agreed or strongly agreed with the proposed draft policy wording. 546 people did not answer.

Full Survey: Summary of main issues raised

- There were some respondents who supported Option A, although some raised concerns that the flexibility would result in reduced levels of GI provision.
- Others preferred a combination of Options A, C and D (including introduction of an Urban Greening Factor),
- Some respondents commented that it is important to consider local needs for and deficiencies of green infrastructure, although standards should be informed by national guidance. There were also comments that there is a need to cross reference with relevant guidance documents and other policies in the plan.
- Responses highlighted that more information is needed in the policy on the maintenance and management of green space.
- It was suggested that off-site provision of green infrastructure is not appropriate - recreational facilities should relate to the development and be located to serve the local community.
- Concerns were raised that the policy is enforceable and resistant to challenge on viability grounds.
- It was also suggested that the policy should make greater provision for those with limited mobility and that GI should be accessible via the active travel network.

Oxfordshire County Council suggested that Part 4(a) should refer to the deficiencies and surpluses identified in Natural England’s latest green infrastructure standards and that the strategic blue-green infrastructure network should be illustrated on a diagram. The county council’s tree policies should also be mentioned.

Comments from **Natural England** included the need to differentiate between GI provision in urban and rural parts of the districts, the use of building for nature standards to meet the Urban Greening Factor (UGF), recommendation that UGF is considered in conjunction with potential increase in Biodiversity Net Gain standards, and the use of Local Green Space designations could be considered.

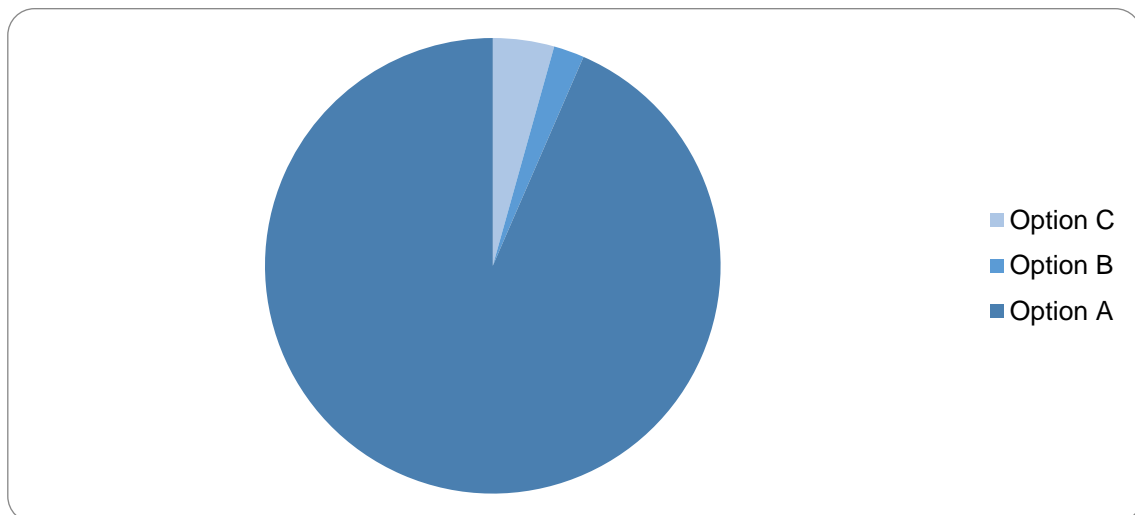
How the main issues have been taken into account

The South Oxfordshire and Vale of White Horse Green Infrastructure Strategy and Open Space Study (2024) includes the headline standards of provision which have been incorporated into relevant policies of the Plan. Policies make clear that development proposals will need to take account of this important piece of work. The approach to delivering green infrastructure should be read alongside all other aspects of the plan and relevant evidence base documents, including those related to infrastructure provision and biodiversity net gain.

Policy HP6 provides the broad principles for Green Infrastructure provision across the districts. Many of the comments raised relate to the other policies in the healthy places chapter. In particular, the need for green infrastructure to be accessible and inclusive is reflected in Policy HP7. This policy also notes on-site provision as a preference. Other mechanisms for meeting need, including off site provision, will be considered in exceptional circumstances.

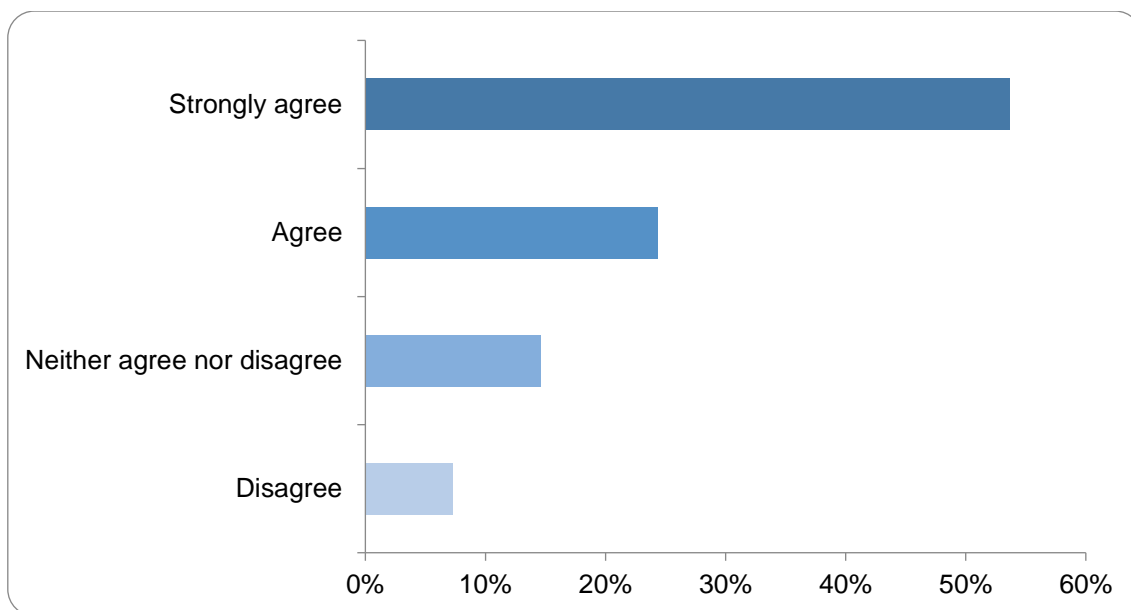
Policy HP7 – Open space on new developments

Full Survey: Which option do you prefer?



Of the 46 people who responded to this question, 93% preferred Option A. 544 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 41 people who responded to this question, 78% either agreed or strongly agreed with the proposed draft policy wording. 549 people did not answer.

Full Survey: Summary of main issues raised

- Respondents commented that clarity is needed on specific open space standards for developments, particularly in relation to masterplanning and site capacity work.
- Other comments stated that the policy should be sufficiently flexible to respond to local needs and circumstances.
- It was suggested that there is a need for standards to relate to open space quality as well as quantity, that it should be accessible for all, and that provision should not be delivered as a substitute for private garden space
- Concerns were raised that open spaces are often used for SuDS, which limits their usability after rainfall - therefore limit dual purposes of space to avoid this.
- There were concerns expressed regarding the use of financial contributions to fund the provision of new open space.
- Some issues were raised that are beyond the scope of the policy - for example, transferring land to public ownership.

Comments from **Natural England** included greater reference to the Natural England Green Infrastructure Framework, the potential for different open space standards in settlements and rural locations, the inclusion of building for nature standards and the recommendation that Urban Greening Factor is utilised in conjunction with Biodiversity New Gain requirements.

Oxfordshire County Council supported Option A and the proposed policy wording and particularly welcomed the reference to the need for the long-term maintenance and management of open space to be secured as part of a planning application.

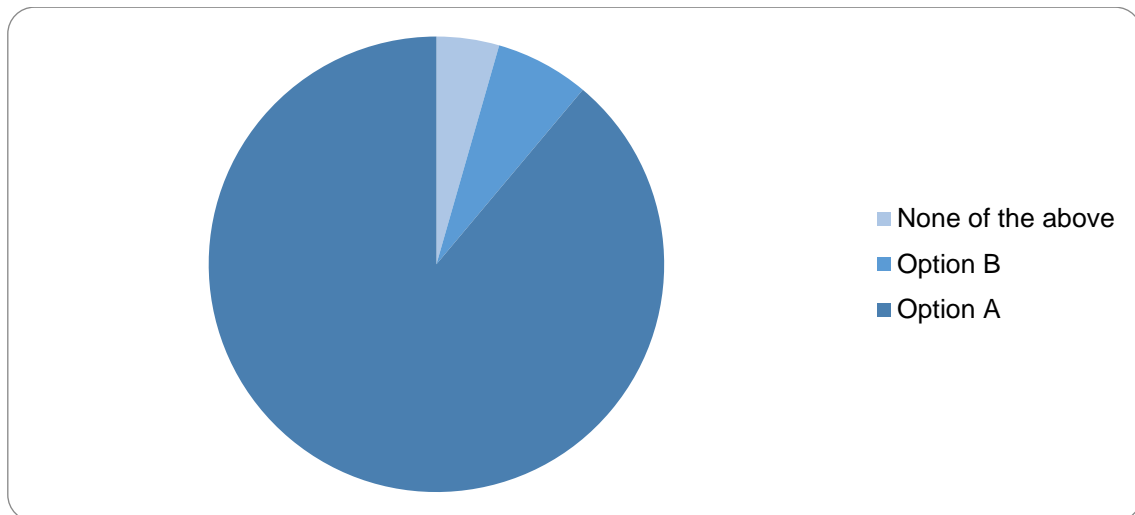
How the main issues have been taken into account

We have updated the policy and drafted the supporting text to take account of a number of the issues raised. In particular, the policy now refers to on-site delivery of open space as a preference. Off-site provision or financial contributions towards the enhancement of existing open space will be acceptable in exceptional circumstances, where on-site provision cannot be achieved. Key headline standards have been included in the policy.

Other points are addressed in our Green Infrastructure Strategy and Open Space Study, which will be submitted with the Plan for examination as supporting evidence. Some of the issues raised are not directly related to land use planning (for example, the ownership of Green Space) or are covered elsewhere in the plan (e.g. the issues relating to private garden space for residential units is covered by a separate policy).

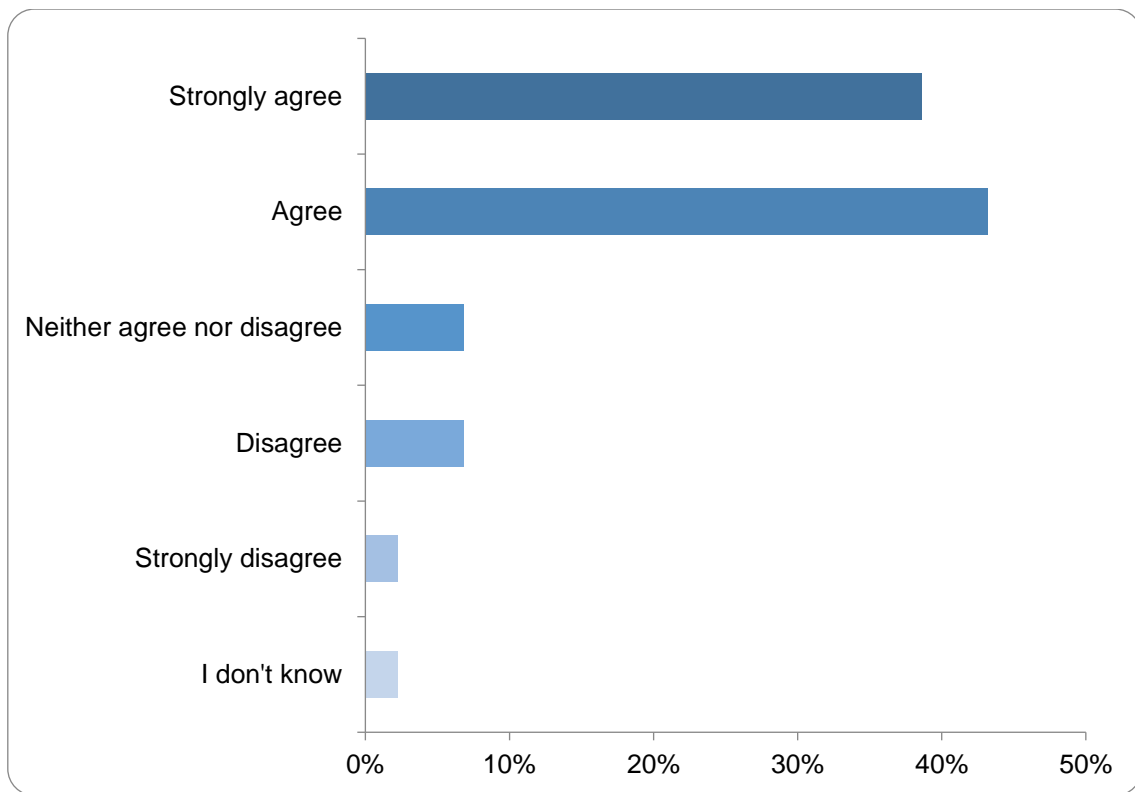
Policy HP8 – Provision for children’s play and spaces for young people

Full Survey: Which option do you prefer?



Of the 45 people who responded to this question, 89% preferred Option A. 545 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 44 people who responded to this question, 82% either agreed or strongly agreed with the proposed draft policy wording. 546 people did not answer.

Full Survey: Summary of main issues raised

- Respondents requested the addition of the specific quantity standard for play areas within the policy.
- Some respondents suggested that better reference should be made to natural play and the importance of nature in play areas, given the rural nature of the districts.
- Respondents supported the idea of creating inclusive play environments for all ages, sexes and abilities, including play areas being designed for inclusive play.
- Respondents asked for clarification on the purpose of large-scale major development undertaking an assessment of nearby play facilities, and asked if this is a validation requirement.
- Some respondents asked for clarification on how to design a play space that would meet the policy requirements.
- Some respondents expressed concerns that this policy may lead to over-provision as there are circumstances where it may be inappropriate for new residential developments to incorporate play provision, such as when providing housing for older people and in areas where there is already very good provision.
- Some respondents were concerned about the safety and usability of play spaces that flood or are near bodies of water.

- Suggestions that the requirement for long-term maintenance should be strengthened, and that it may include transfer of the play space to a town or parish council.
- Suggestions that there should be a requirement for communities to be consulted on the design of play spaces.

Sport England supported the policy, particularly the requirement for large-scale major development to undertake an assessment of facilities in the surrounded area.

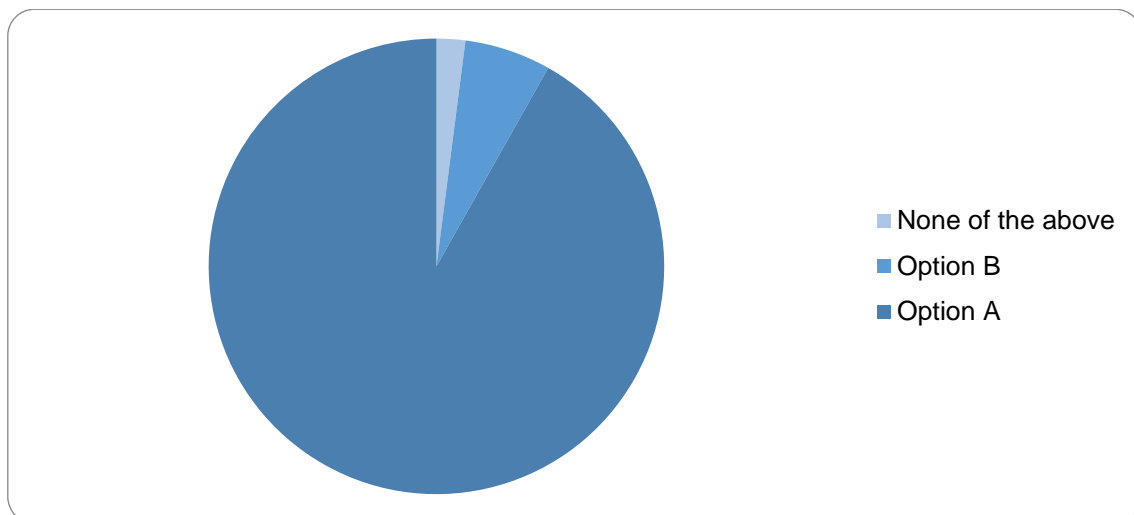
Oxfordshire County Council generally supported the policy, but suggested specific mention should be made to the needs of teenagers.

How the main issues have been taken into account

We have updated the policy with the findings of our Green Infrastructure Strategy and Open Space Study in mind, which included an open space audit, including assessing the quality of play areas across the districts. We have also updated the policy to include specific quantity standards for the provision of children’s play and spaces for young people. The policy now directly references the Joint Design Guide, which provides further guidance on the design of play spaces. The requirement to provide formal play equipment has been removed, as this may not always be necessary or appropriate in some contexts. Reference to best practice for inclusive play has been added to the supporting text. The supporting text also details that the purpose of large-scale major development undertaking an assessment of nearby play facilities, is simply to avoid overprovision or saturation of a particular type of play area. Other issues raised will be addressed on a site-specific basis through the planning application process.

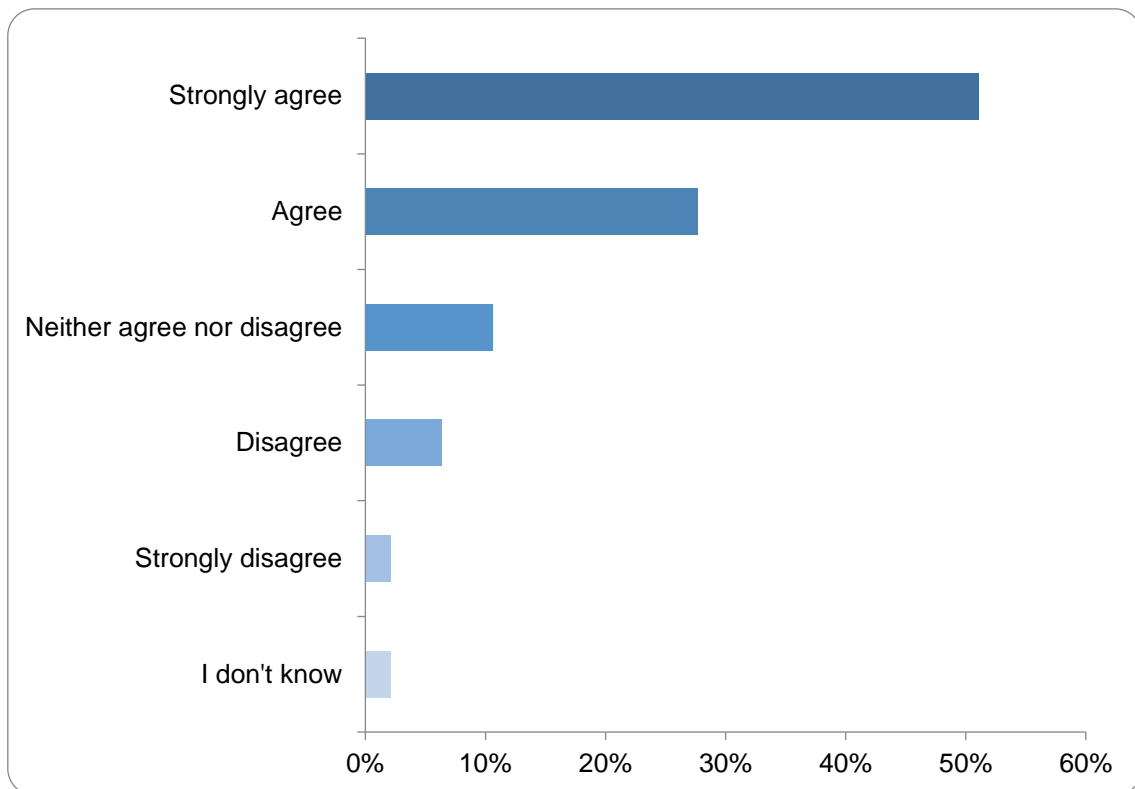
Policy HP9 – Allotments and community food growing

Full Survey: Which option do you prefer?



Of the 49 people who responded to this question, 92% preferred Option A. 541 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 47 people who responded to this question, 79% either agreed or strongly agreed with the proposed draft policy wording. 543 people did not answer.

Full Survey: Summary of main issues raised

- Most respondents expressed support for the policy, commenting on the benefits of self-sufficiency in not relying on imported food, and expressing concerns about the length of some of the current waiting lists for allotments in particular.
- Some respondents questioned the threshold for providing allotments or community food growing opportunities on site, suggesting that the 300 home threshold was arbitrary and unevidenced. Some suggested it should be higher, and others suggested it should be lower.
- Some respondents questioned the potential viability and site capacity implications for providing community food growing facilities on site.
- Some respondents suggested a flexible approach to community food growing should be encouraged.
- Some respondents questioned how allotments, which are only accessible by members, could be considered “integral” to green infrastructure provision.

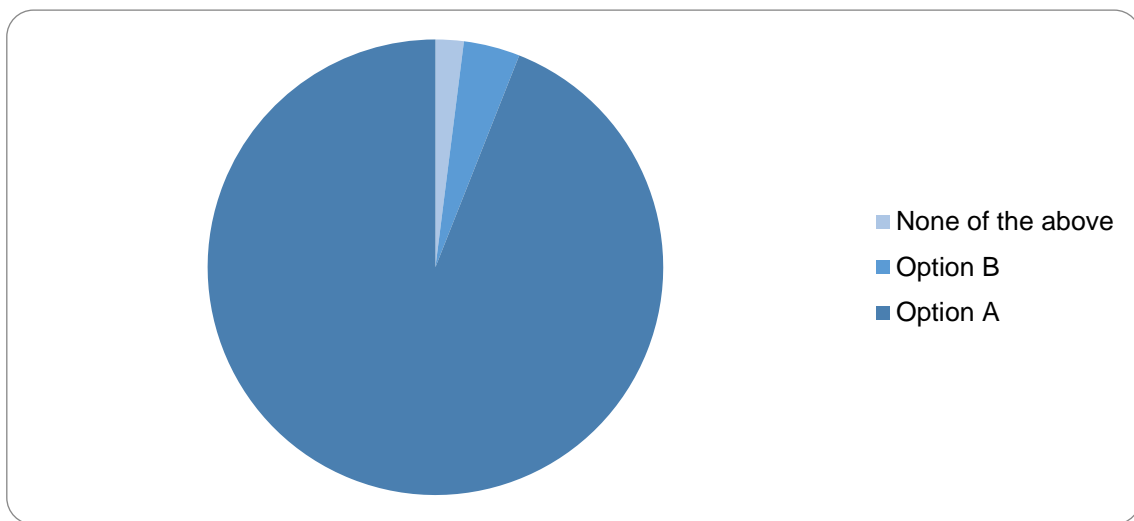
Oxfordshire County Council expressed support for this policy.

How the main issues have been taken into account

We have updated the policy with the findings of our Green Infrastructure Strategy and Open Space Study in mind, which included an open space audit and a survey of allotment and community food growing capacity across the districts. A quantity standard, based on the study, has been added to the policy. The threshold for onsite provision has been lowered to 200 homes, however, the policy has been renamed to “Provision of community food growing opportunities” and reworked to reflect a greater degree of flexibility in how community food growing opportunities could be provided. We have ensured that this policy has been subject to whole plan viability testing. The requirement for allotments to form an integral part of green infrastructure provision has been removed.

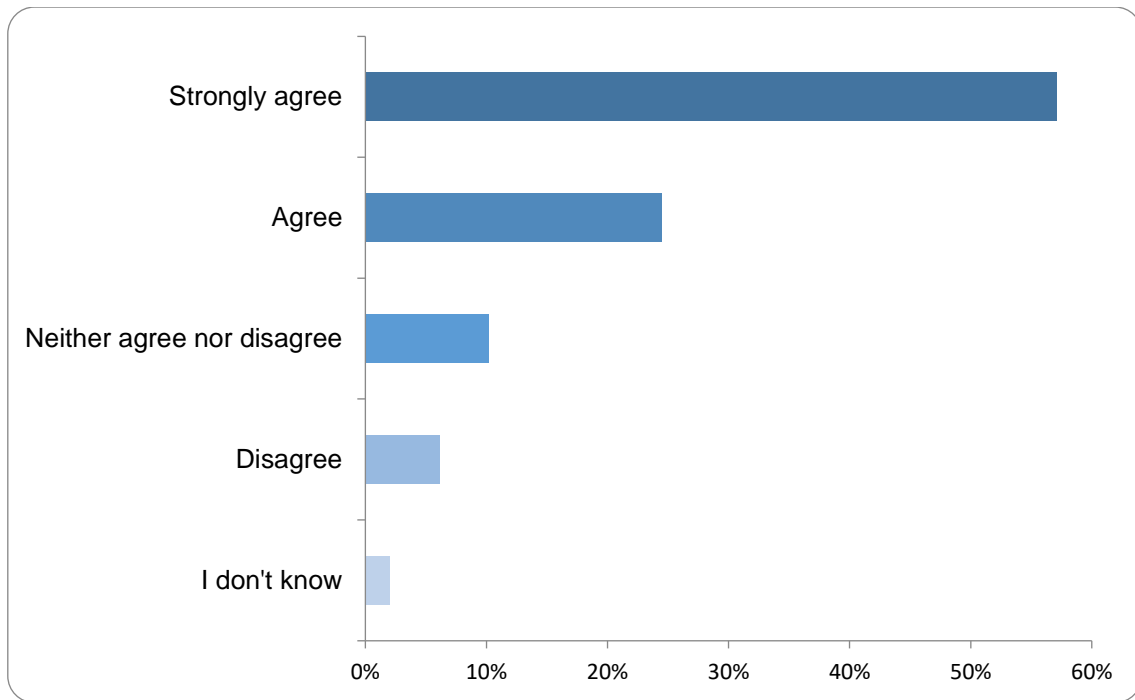
Policy HP10 – Watercourses

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 94% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 49 people who responded to this question, 81% either agreed or strongly agreed with the proposed draft policy wording. 541 people did not answer.

Full Survey: Summary of main issues raised

- Further clarity needed on the definition of a watercourse, the buffer zone and what is included within it. Some suggest the need for a 20 metres buffer zone, others are of the view that flexibility is needed, to include a smaller buffer in urban areas.
- Encouragement needed for active travel - watercourses could be bridged where appropriate to help with active travel.
- Other aspects should be included in the policy – including flood assessments, construction management plans and environment plans, soil management plans and preserved wetlands.
- The Earth Trust noted that the policy should provide stronger resistance to culverts and opportunities to remove these should be a requirement for planning applications.
- Watlington Parish Council support 10 metre buffer.

The Environment Agency welcomed the approach to culverting and general approach to buffer zones. They suggested wording on this point – ‘Development should include a minimum 10m buffer zone (measured from top of bank) along both sides of the watercourse.

Historic England suggested adding supporting text to highlight the contribution made by watercourses to local character with potential cross-reference to character and heritage policies.

Oxfordshire County Council supported this policy in relation to watercourses at this point in the planning process.

How the main issues have been taken into account

The definition of a watercourse and the buffer zone has been included in the supporting text to reflect the Environment Agency's suggested text. The approach to culverting is also set out in the policy. The supporting text provides extensive guidance on the requirements for new development in close proximity to watercourses, to be read alongside other policies in the plan.

A number of the issues raised relate to other policy areas, including the need for references to construction management and soil management plans and active travel.

Other general comments regarding Chapter 11: Healthy places

Full Survey: Summary of main issues raised

- Respondents supported the ambition of this chapter for healthy place making, commenting on the benefits the built environment can have for health and wellbeing.
- One respondent suggested the policies in this chapter should be strengthened, with greater enforceability.

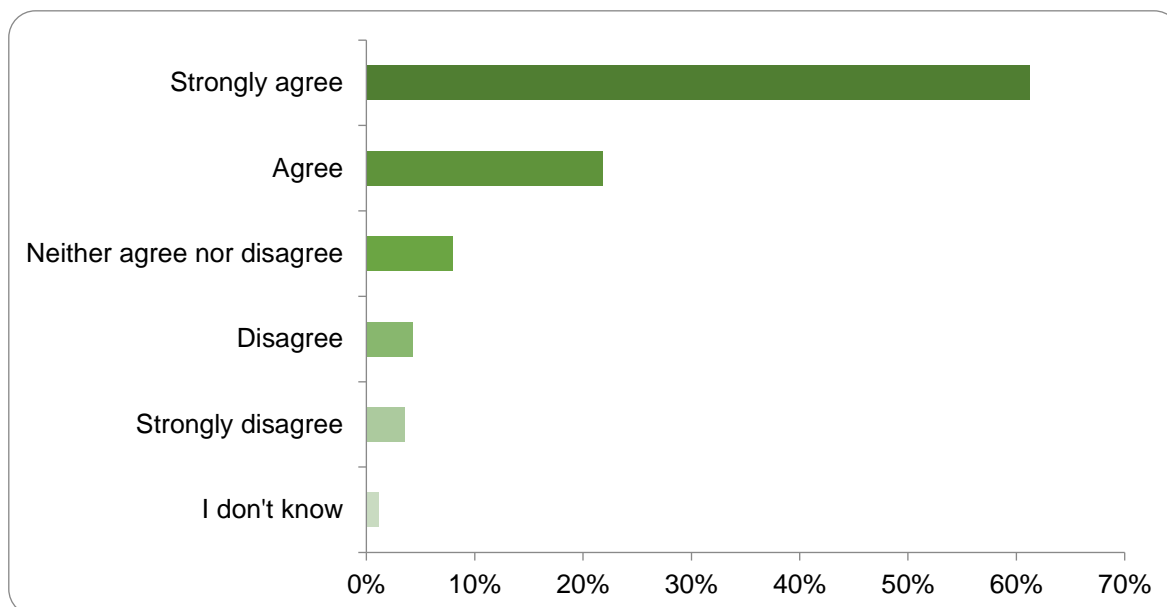
Oxfordshire County Council recommended that the introductory section references the importance of using planning to address the health inequalities experienced by residents living in areas of deprivation in the districts. The innovation team also listed several ways in which innovation may contribute to healthy communities, including highlighting that using timber as a construction material can create housing and spaces that promote mental wellbeing.

How the main issues have been taken into account

While the wording of all policies has been reviewed and each policy will be applied in the determination of planning applications, matters of enforcement are beyond the scope of the Joint Local Plan. The supporting text in the introduction to the chapter has been updated to reflect on health deprivation in the districts.

Nature recovery, heritage and landscape

Nutshell (Section 11): How far do you agree or disagree with the Joint Local Plan requiring developers to provide a higher level of biodiversity than in the Environment Act?



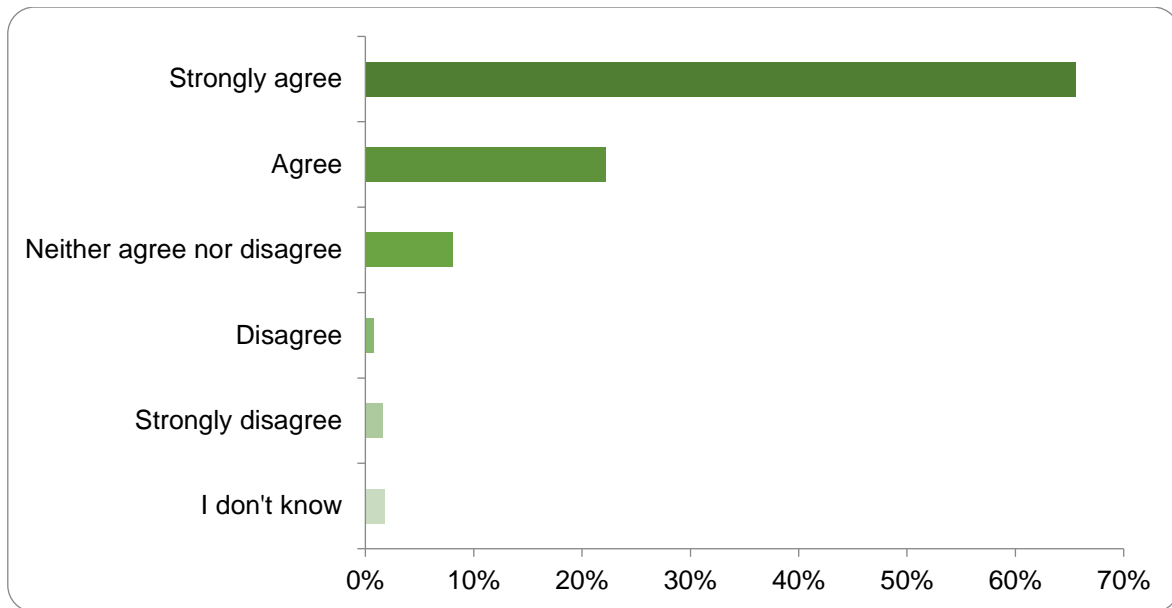
Of the 627 people who responded to this question, 83% of people either agreed or strongly agreed with the Joint Local Plan requiring developers to provide a higher level of biodiversity than in the Environment Act. 55 people did not answer.

Nutshell (Section 11): Other comments on nature recovery

233 people answered this question.

A large number of respondents supported the proposals to increase biodiversity wherever possible, and thought the biodiversity net gain percentage should be as high as possible (noting potential variations based on location), should be legally binding and must be enforced. Respondents felt it is necessary to protect the environment from development. There was support for a policy to enable delivery, although some respondents felt that developers do not care, may not deliver the requirements due to viability and questioned the deliverability. Some did not support going above biodiversity net gain requirements with the policy. Respondents suggested that a hierarchy is needed to protect biodiversity first, with management and ongoing accountability is necessary. Green corridors were supported, with respondents highlighting the need to protect these environments and create more. Other proposals to enhance biodiversity and habitats were suggested, including hedgehog highways, swift bricks, bat boxes, bee hives and roosting places.

Nutshell (Section 12): How far do you agree or disagree with adding these additional policies to protect the landscape in the Joint Local Plan?



Of the 622 people who responded to this question, 88% of people either agreed or strongly agreed with adding these additional policies to protect the landscape in the Joint Local Plan. 60 people did not answer.

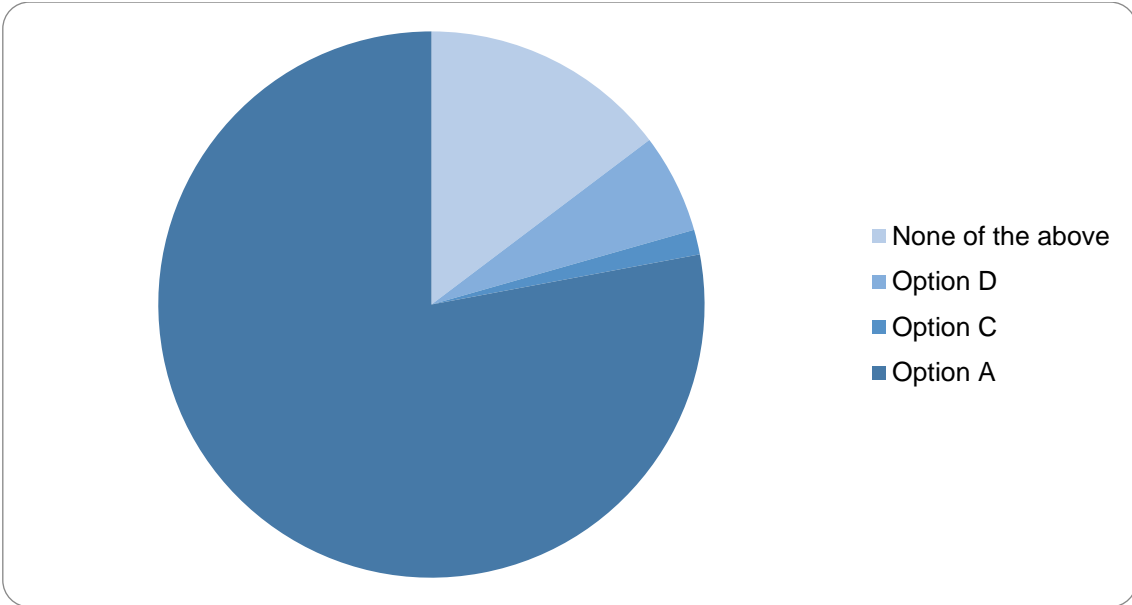
Nutshell (Section 12): Other comments on valuing the landscape

176 people answered this question.

A large number of respondents highlighted the importance of protecting the landscape, green space and Green Belt. Respondents supported the policy but thought it should be doing more to protect biodiversity and wildlife from negative landscape impact. Some respondents felt the council have failed to protect landscape to date. Light pollution was considered to have increased, and respondents felt it needs to be reduced, with particular support for, and importance placed on, dark skies. Respondents also felt that important views should be protected, particularly in rural areas and small villages. A number of respondents referenced specific developments and the potential harm they would have on the environment and local area. Some respondents felt that landowners and stakeholders should be consulted and worked with to develop a sustainable solution. In some cases, respondents felt that other factors (such as delivery of new homes or renewable energy) should be prioritised instead.

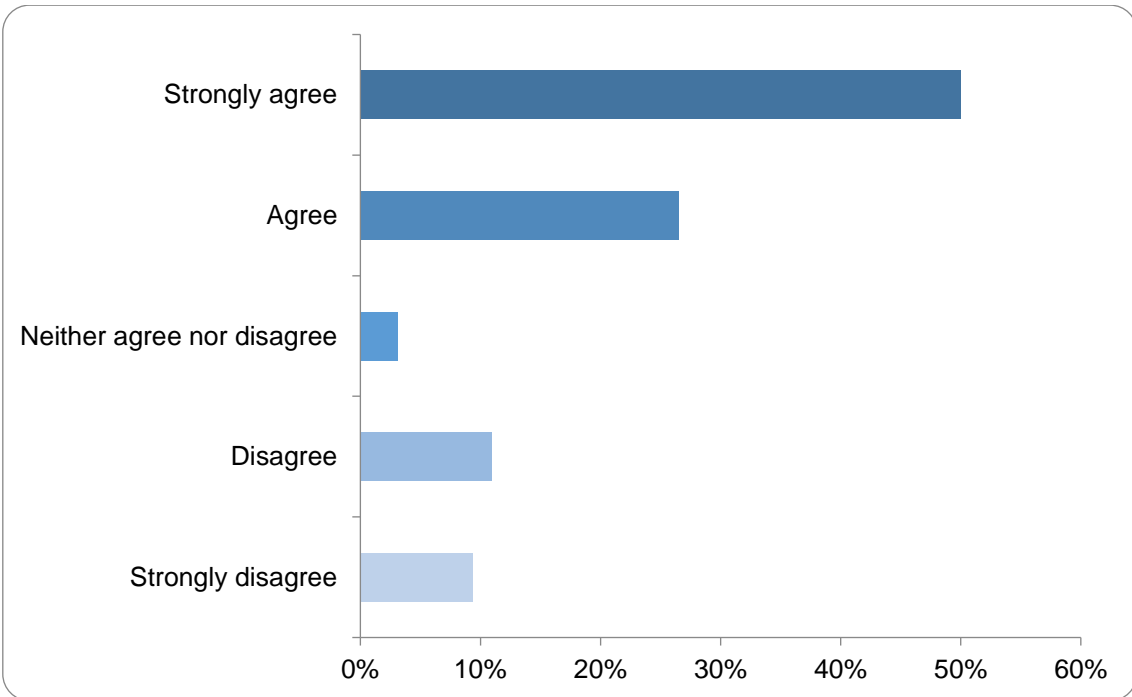
Policy NH1 – Nature recovery

Full Survey: Which option do you prefer?



Of the 68 people who responded to this question, 78% preferred Option A. 522 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 64 people who responded to this question, 77% either agreed or strongly agreed with the proposed draft policy wording. 526 people did not answer.

Full Survey: Summary of main issues raised

- The importance of protecting, restoring and enhancing land for nature was emphasised.

- There was significant support for setting a higher biodiversity net gain (BNG) requirement (20-25%).
- There were also a lot of comments (mainly from the development industry) suggesting that we should not go above the mandatory 10% BNG requirement due to viability impacts, lack of flexibility, and lack of justification. It was suggested that the impacts of a higher requirement on site capacities needs to be tested and that we may need to consider allocating additional sites. It was also suggested that providing more than 10% biodiversity net gain should be expressed as an aspiration rather than a requirement.
- There were a range of comments on the proposed approach to directing off-site BNG, including requests to only allow on-site delivery and requests to add additional steps to the sequential approach.
- There were concerns about the availability of off-site biodiversity units to purchase within the districts.
- Some suggested that requirements for features to support wildlife should be more ambitious and/or specific. Others were concerned that the requirements are too prescriptive. There were also concerns that these features can be greenwashing and may be ineffective.

The **Environment Agency** requested that the following text is added to the policy: “Biodiversity net gain will be required for all habitat types including watercourses within 10m of the red line boundary and measured with the appropriate survey technique as outlined in the DEFRA Biodiversity Metric guidance.”

Natural England welcomed reference to the Local Nature Recovery Strategy and were keen to see how the emerging areas for protection, restoration and enhancement of nature would be reflected in the policy. They advised that the policy should also include designated sites, Irreplaceable and Priority Habitats, Ancient and Veteran Trees and Hedgerows and Local Wildlife Sites. They also suggested making reference to wider ecological networks. They strongly encouraged the approach to increase BNG above the mandatory 10% and recommended that we identify where in the ecological network BNG may be delivered in situations where on-site delivery is not possible, in a way that reflects local priorities.

The **Ministry of Defence** highlighted that some forms of environmental improvement/enhancement may not be compatible with aviation safety. Locations providing BNG should be assessed against statutory safeguarding zones. If they are within these zones, then the MOD should be consulted.

Historic England advise that the relationship between the natural and historic environments should be recognised in the supporting text. Newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on heritage assets and their settings.

Oxfordshire County Council were supportive of setting a BNG requirement greater than the mandatory minimum 10%. They pointed to the interim nature recovery network mapping that could be referred to whilst the LNRS is still in development. They suggested a further step should be added to the sequential approach for off-

site BNG that considers areas outside of the plan area prior to purchasing national credits.

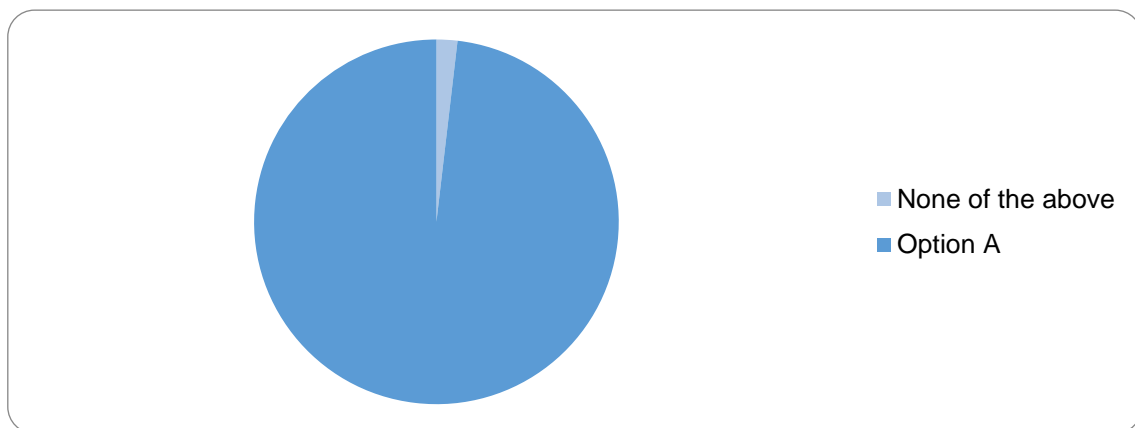
How the main issues have been taken into account

We have produced additional evidence, including viability testing, to help us identify an appropriate BNG requirement for the JLP. We have also added some additional steps to the approach for directing off-site BNG. The approach now also recognises wider ecological networks. Requirements for features to support wildlife have been clarified.

Please note: This policy is now 'NH2 – Nature Recovery' in the Publication Version of the Joint Local Plan.

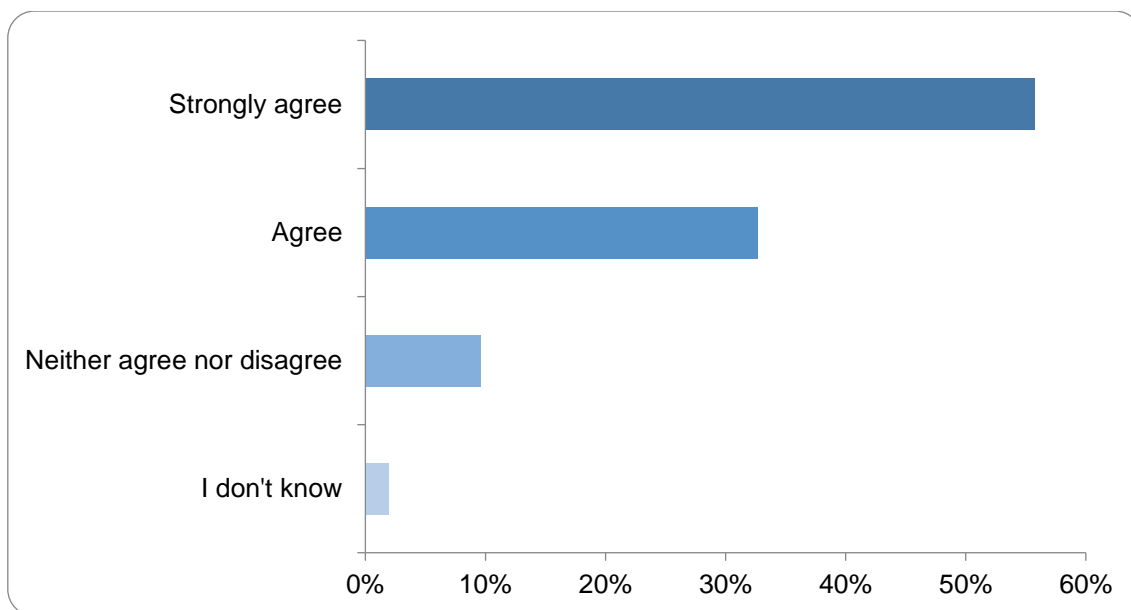
Policy NH2 – Biodiversity designations

Full Survey: Which option do you prefer?



Of the 54 people who responded to this question, 98% preferred Option A. 536 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 52 people who responded to this question, 89% either agreed or strongly agreed with the proposed draft policy wording. 538 people did not answer.

Full Survey: Summary of main issues raised

- There was support for protecting the hierarchy of biodiversity designations.
- Some people felt that there are no circumstances where mitigation or compensation for loss or harm to designated sites or species should be accepted.
- There were requests for more information to be provided on Local Wildlife Site designations.
- The need to consider the impacts of development within the hydrological catchment of a lowland fens was highlighted. There were request for a specific policy on fens.
- It was suggested that requirements related to Sites of Special Scientific Interest (SSSI) should be updated to better align with national planning policy.
- It was suggested that the implications of the River Lambourn SAC nutrient neutrality requirements could be clearer, for example by setting out a standardised methodology and off-setting scheme for nutrients.
- There were requests to provide definitions of Important and Ancient Hedgerows.
- New biodiversity designations were proposed including a 'regional nature park' in the Bernwood, Otmoor and Upper Ray area, and new 'nature landscapes'.

Natural England welcomed a policy providing the highest level of protection for European sites and SSSI. They suggested that in addition to Ancient Woodland and Veteran Trees, the policy should also specify other Irreplaceable Habitats (such as lowland fen) and Priority Habitats.

Oxfordshire County Council supported the proposed policy but sought clarity on the proposed process for assessing potential Local Wildlife Sites - does the applicant

undertake this step, and how does it relate to the Local Wildlife Site selection process?

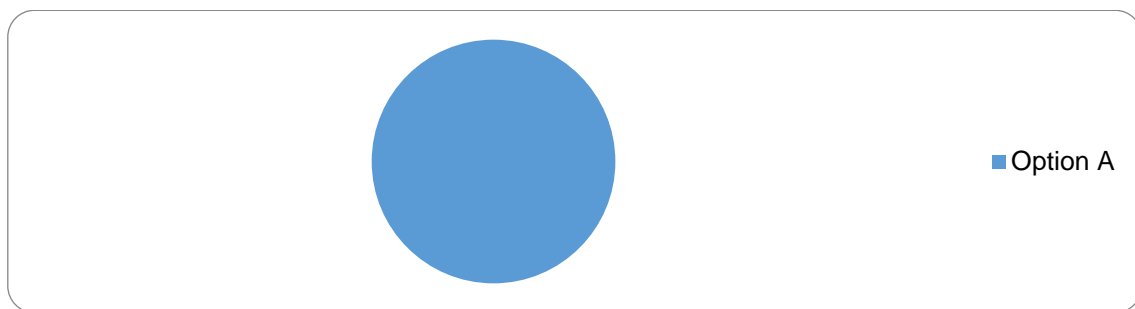
How the main issues have been taken into account

SSSI requirements have been amended to better align with national planning policy. Definitions for Important and Ancient Hedgerows have been added to the Joint Local Plan glossary. Supporting text has been added to provide more detail on Local Wildlife Site designations. The councils have commissioned additional evidence to identify lowland fens and their hydrological catchments, so that the impacts of development on these Irreplaceable Habitats can be better understood. The policy now contains clear requirements for protecting lowland fens based on the new evidence.

Please note: This policy is now 'NH1 – Biodiversity Designations' in the Publication Version of the Joint Local Plan.

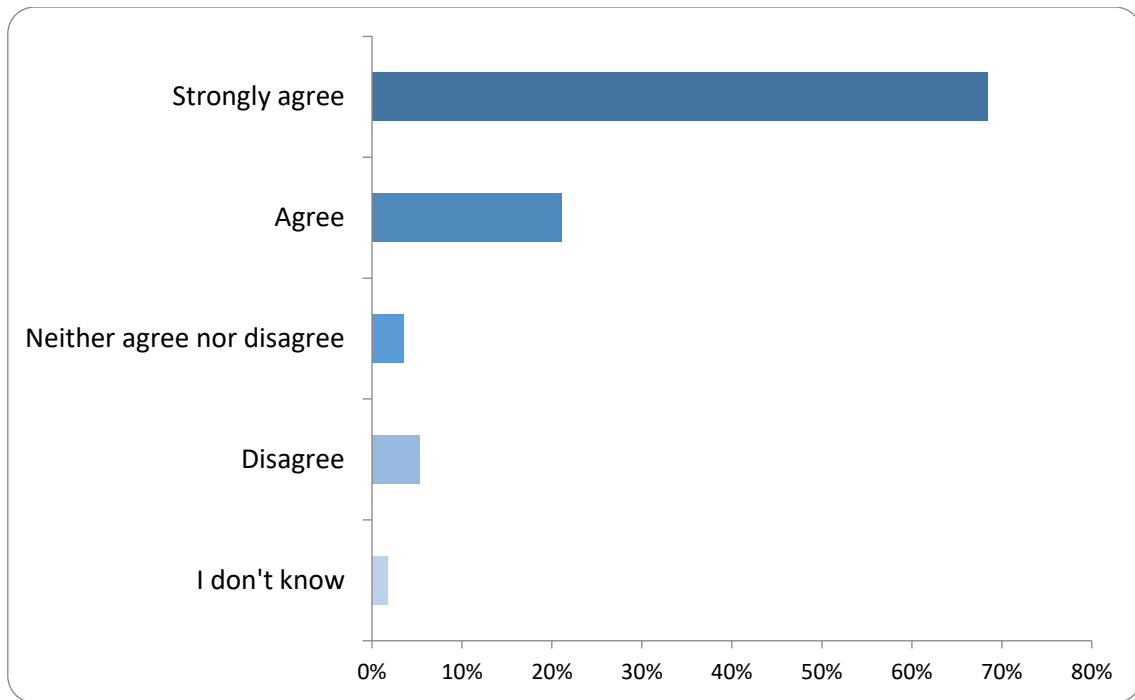
Policy NH3 – Trees and hedgerows in the landscape

Full Survey: Which option do you prefer?



Of the 57 people who responded to this question, 100% preferred Option A. 533 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 57 people who responded to this question, 89% either agreed or strongly agreed with the proposed draft policy wording. 533 people did not answer.

Full Survey: Summary of main issues raised

- Strong support was given for a separate policy which protects trees and hedgerows. It was suggested that the policy would complement existing work being done to maintain or increase tree cover in Oxfordshire and help combat the impacts of climate change. There were however a few suggestions that the policy could be merged into the Green Infrastructure policy.
- There was acknowledgement that development should retain and incorporate important hedgerows and existing trees, and developers should protect what is already on site rather than removing mature trees and hedges and replacing them with new planting as that is not the same and takes time to start providing the same benefits.
- We received multiple requests to reference the Hedgerow Regulations, with the explanation that the default position should be to retain all ancient/ecologically significant hedgerows.
- A few comments requested clarity on the definition of an important hedgerow, and the linkages to Policy NH1 (Biodiversity designations) which refers to important or ancient hedgerows.
- There was support for providing the right tree in the right location, with an emphasis on ensuring the species chosen should not just be based on size, but other considerations as well, such as distance from each other and impact on waterways, carbon-rich soils and species-rich grasslands.
- There were some suggestions for amending policy wording to clarify that native species with UK provenance are preferred.

- There were suggestions for the policy to be strengthened such as requiring a greater replacement rate when trees are lost during development, or setting a target for canopy cover.
- Concern was raised that the policy will not be enforced, and trees and hedges will be lost after planning permission is granted, with the inference that as well as planting, the maintenance of trees and hedges is important.

Historic England welcomed this policy and highlighted the potential heritage significance of trees and hedgerows in the landscape.

Oxfordshire County Council noted the overlap between this policy and the policies on landscape and GI. They welcomed a specific tree and hedgerow policy, but would like it to be strengthened through more specific measurable requirements, as well as further detail on what information should be submitted and how compliance against the policy will be assessed. They also suggested that adding reference to the Oxfordshire Treescape Opportunity Map in the policy could help to steer tree planting to the right locations.

How the main issues have been taken into account

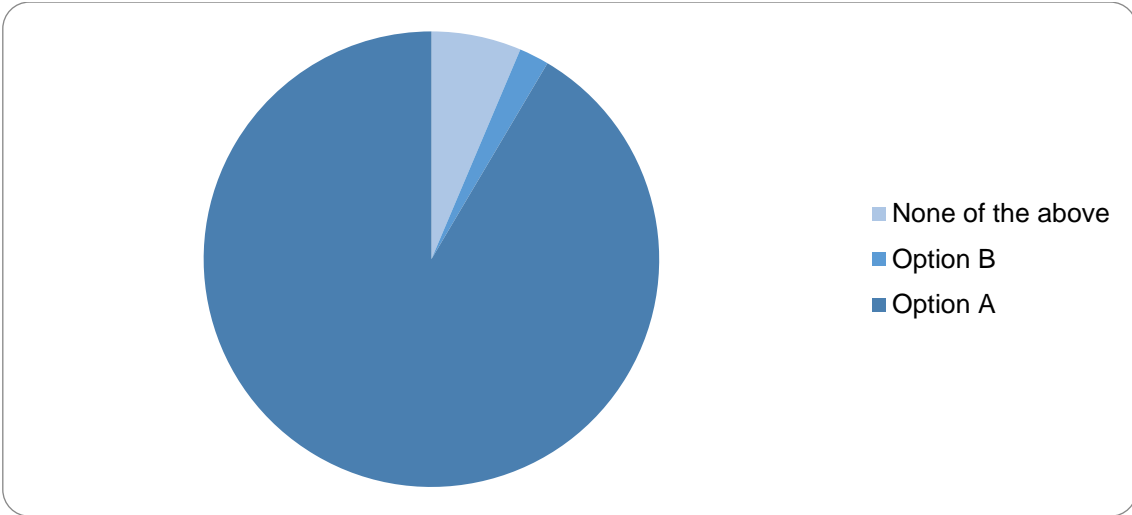
We amended the wording of the policy to remove reference to ‘important hedgerows’, as the intent of the policy is that all hedgerows and trees should be retained where possible. This also removes confusion and duplication, since protection of ‘important and ancient hedgerows’, ‘ancient woodland’, and ‘ancient or veteran trees’ is dealt within Policy NH1 (Biodiversity designations).

There was discussion regarding adding reference to ‘locally native’ to the policy. However, there is a need for both native and non-native planting to ensure we have a climate-resilient and robust tree population, resistant to pests and diseases. An explanation was included in the supporting text to help clarify our position.

There were numerous requests to strengthen and clarify aspects of the policy. We added a reference in the policy to providing a net gain in canopy cover to help support this aim. We included supporting text to further explain what types of canopy cover might be appropriate, along with other points for developers to consider. We made reference to the Oxfordshire Treescape project in the supporting text, as well as further detail on how tree data should be collected, and how we expect site design to consider the retention and planting of trees and hedgerows (taking a holistic and long-term view). A reference to the existing and future hedgerow regulations has also been included in supporting text.

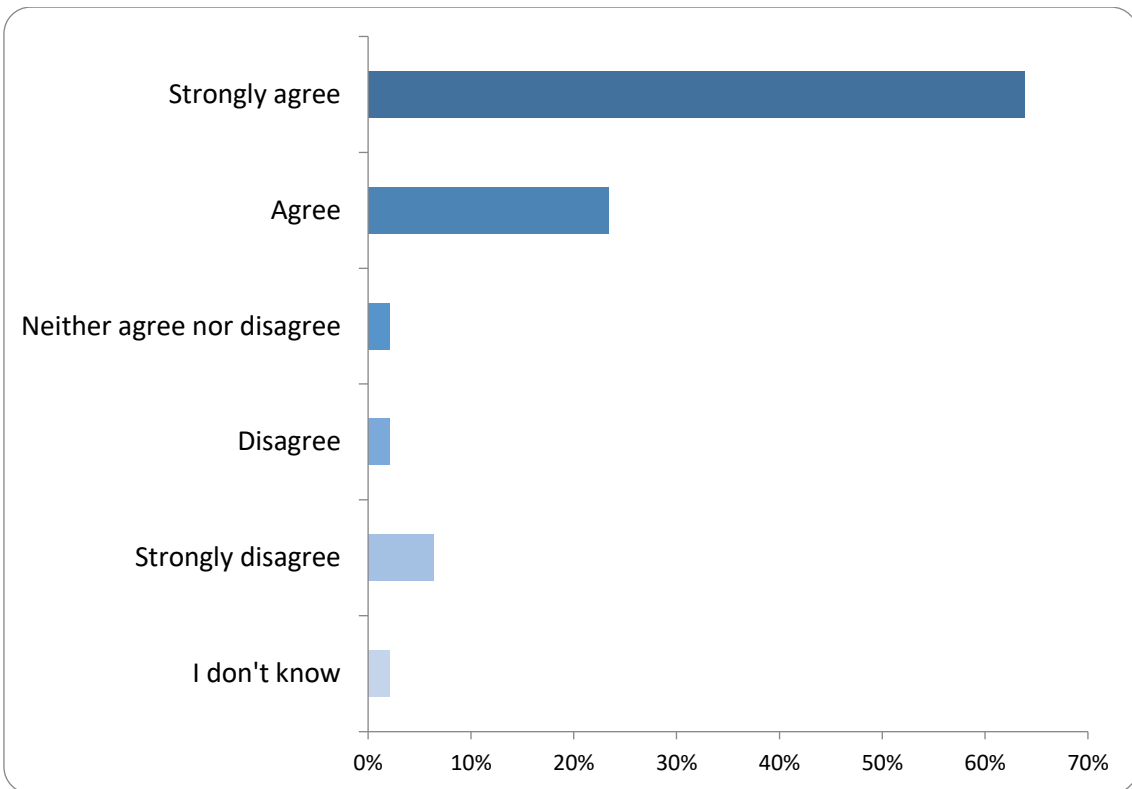
Policy NH4 – Chilterns and North Wessex Downs National Landscapes (formerly AONBs)

Full Survey: Which option do you prefer?



Of the 47 people who responded to this question, 91% preferred Option A. 543 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 47 people who responded to this question, 87% either agreed or strongly agreed with the proposed draft policy wording. 543 people did not answer.

Full Survey: Summary of main issues raised

- Overall the majority of respondents supported the policy and advised that the highest level of protection should be given to National Landscapes. There was

a suggestion that the importance of the topic should mean the landscape policies should be located sooner in the plan order.

- There were some comments which stated that local plan policies should not duplicate national policy and guidance and that the local plan is attempting to go beyond the requirements of the NPPF and all/sections of the policy should be deleted.
- There were suggestions that the policy should be more robust in protecting the setting of the National Landscape. Others suggested reference to the setting should be removed from the policy.
- There was discussion of the name change from AONB to National Landscape, with one comment saying the name should revert to AONB and another providing additional context as to why the name change was beneficial and shows that these areas are important for more than just their beauty. This was followed up with multiple suggestions that the policy should acknowledge this change and provide further clarity on when a proposal is considered 'major' when within a National Landscape.
- There were a couple of recommendations that the dark skies associated with National Landscapes should also be protected.

Historic England welcomed reference to distinctive character and cultural heritage in the policy.

Natural England welcomed the inclusion of the policy to give great weight to conserving and enhancing the landscape and scenic beauty of the Chilterns and North Wessex Downs National Landscapes. They noted that they would review the Landscape Character Assessment, Tranquillity Assessment and Renewable Energy Sensitivity Assessment at the next stage of consultation.

Oxfordshire County Council were generally supportive of the policy and the great protection afforded to National Landscapes and their management plans. They requested further detail to be added to Part 3, in relation to when adverse impact are unacceptable, and caution this section could have the potential to stop development altogether.

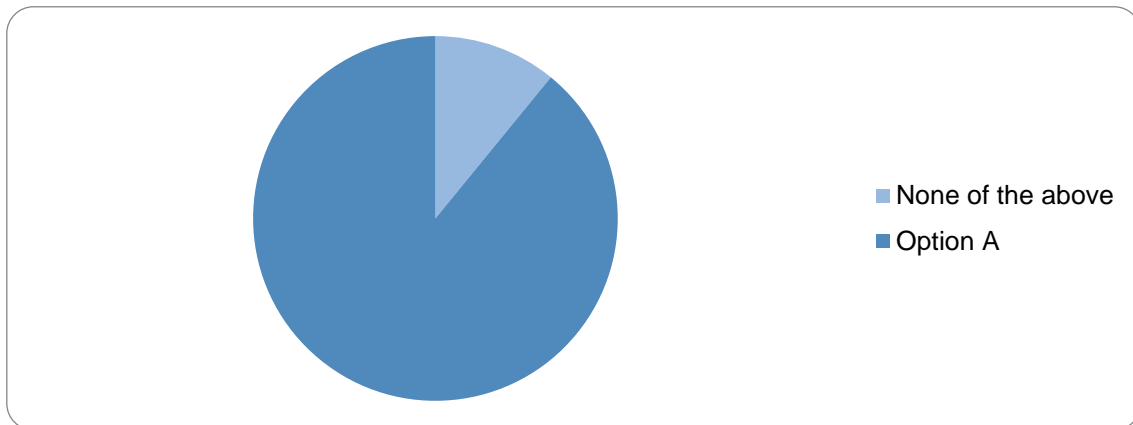
How the main issues have been taken into account

Some consultation comments called for sections/all of the policy to be deleted, or advised that the policy goes beyond the requirements of the NPPF. However these sections of the policy were not removed or diluted as the Levelling-up and Regeneration Act (2023) has amended section 85 of the Countryside and Rights of Way (CRoW) Act 2000, to create a new duty on relevant authorities to 'seek to further the purpose of conserving and enhancing the natural beauty of the area' when discharging their functions in National Landscapes. The new duty replaces the previous requirement for relevant authorities to 'have regard' to the purpose of National Landscapes. Natural England has advised that this amendment to the duty is intended as a more proactive and strengthened requirement, and we are reflecting this in our proactive policy. Minor wording changes have been made to emphasise the importance of the natural beauty of the National Landscapes, and supporting text has been incorporated to provide clarity where appropriate.

In addition, there were comments regarding the protection of the dark skies intrinsically linked to the National Landscapes. No addition was made to policy NH4 regarding the dark skies of the National Landscapes, as we have a dedicated dark skies policy at CE11 which has a special criterion on National Landscapes.

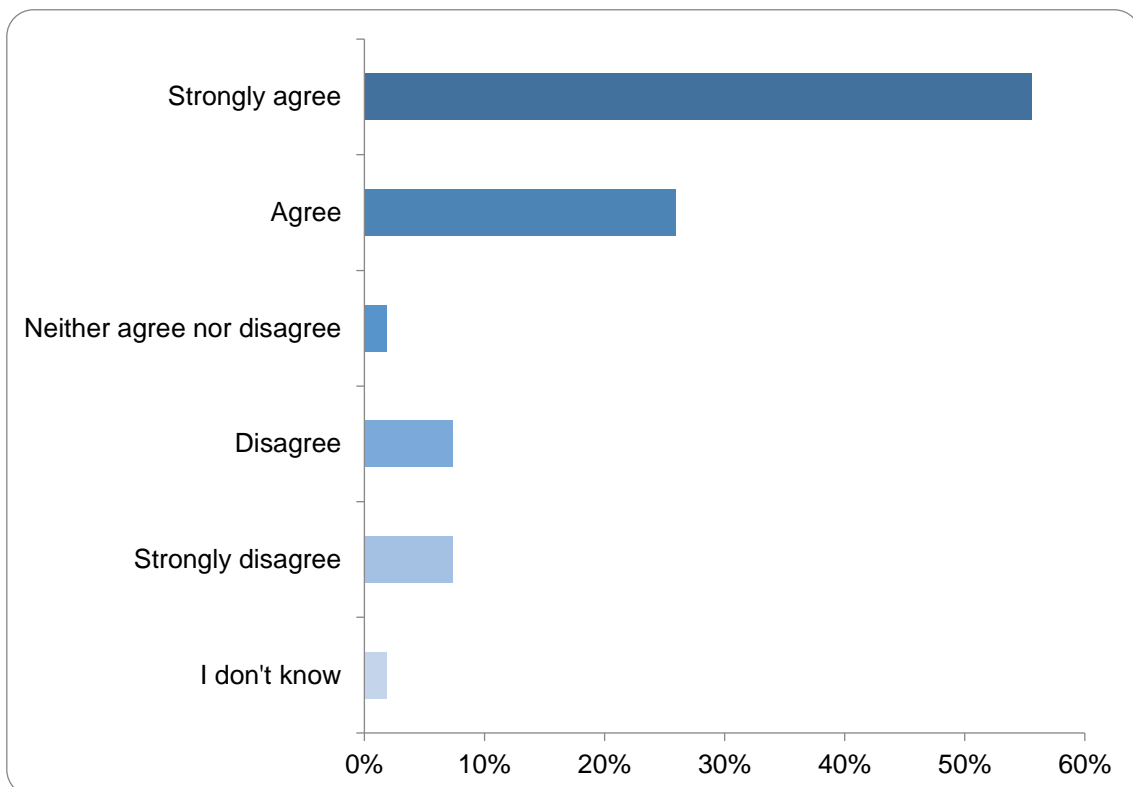
Policy NH5 – Landscape

Full Survey: Which option do you prefer?



Of the 55 people who responded to this question, 89% preferred Option A. 535 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 54 people who responded to this question, 82% either agreed or strongly agreed with the proposed draft policy wording. 536 people did not answer.

Full Survey: Summary of main issues raised

- There was strong support in principle for the proposal to create additional protection for landscape, with general agreement that there are areas of value within the districts which are not currently designated but provide value to communities. Overall, there was support for a district-wide assessment to identify these areas.
- There were some calls for the policy to be worded more robustly to restrict development.
- It was also felt that it should immediately follow the National Landscapes policy.
- Some respondents stated that the existing framework and NH6 (landscape) provide sufficient protection for landscape. That the designation of locally valued landscapes is unjustified and unnecessary, and the policy should not be included. With others saying if it is retained, that it should be acknowledged that the protection of landscape should be balanced against the need to deliver housing or national infrastructure within the district, which could be designed to enhance the landscape.
- Some believed the policy duplicated national policy and guidance. There were suggested amendments to the wording to clarify the policy is in line with paragraph 180 of the NPPF and not overly onerous. Although it was recognised that the policy still allows for development within the valued landscape.
- There were a few comments who agreed with the principle but would like it to be built upon by/reference the neighbourhood plan process, incorporating local consultation.
- Some suggestions of areas which should be designated included: the Oxford Green Belt, the setting of the North Wessex Downs National Landscape, Uffington White Horse, the Bernwood, Otmoor and Upper Ray area, smaller specific areas within parishes, and important views (as identified in NDPs).
- Concern was raised that any support for the proposal was conditional on which areas were later identified and consulted on.
- There was concern that if an area locally valued is omitted from this new designation, that area would become more vulnerable to development.

Historic England were interested to review the proposed valued landscapes. When responding to the council's consultants LUC on the landscape character assessment work, they recommended adding more detail where that relates to Registered Parks and Gardens (e.g. Shotover Grade I) and Chalgrove Registered Battlefield. They also requested that LUC refer to Scheduled Monuments where appropriate i.e. where they made a significant contribution to the local landscape.

Oxfordshire County Council noted that the inclusion of such a policy requires further information and justification and should not conflict with the NPPF.

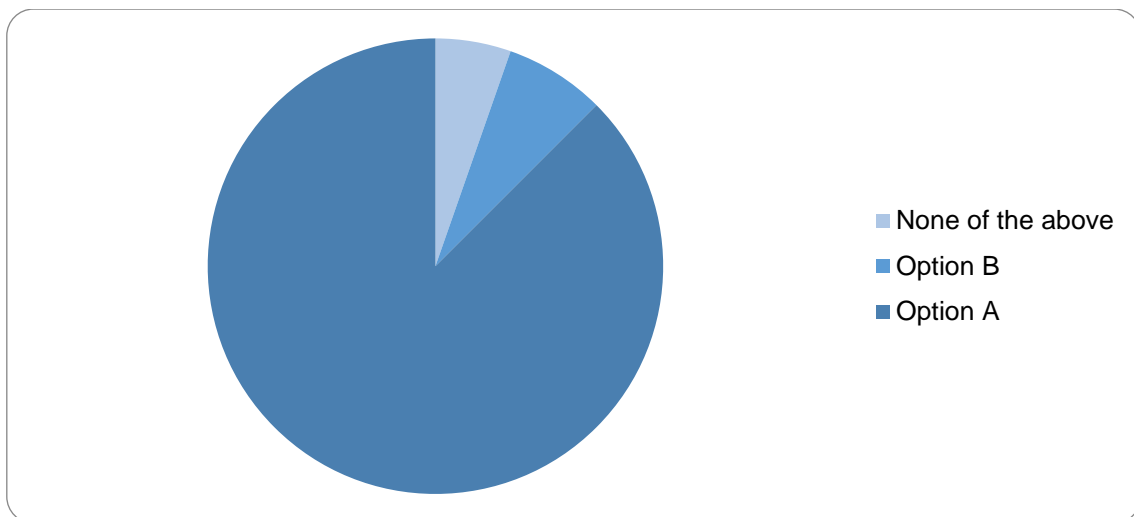
How the main issues have been taken into account

Paragraph 181 of the NPPF asks plans to distinguish between the hierarchy of designated sites: international, national and local. Following the suggestion from respondents to the Preferred Options Consultation and in order to be consistent with the NPPF, we amended the order of the policies so that the policy referencing national landscape designations (National Landscapes) is then immediately followed by the policy on local landscape designations (District-Valued Landscapes). What valued landscapes are and how they relate to each other was expanded upon in the supporting text, to help give context to the policy.

The policy has been led by evidence, following the methodology set out in the Valued Landscape Assessment to shortlist the proposed local landscape designations. The process included consideration of valued landscapes designated in neighbourhood plans. Furthermore, the supporting text clarifies that neighbourhood plans can designate smaller scale neighbourhood valued areas using a methodology similar to that undertaken to support our new District-Valued Landscapes.

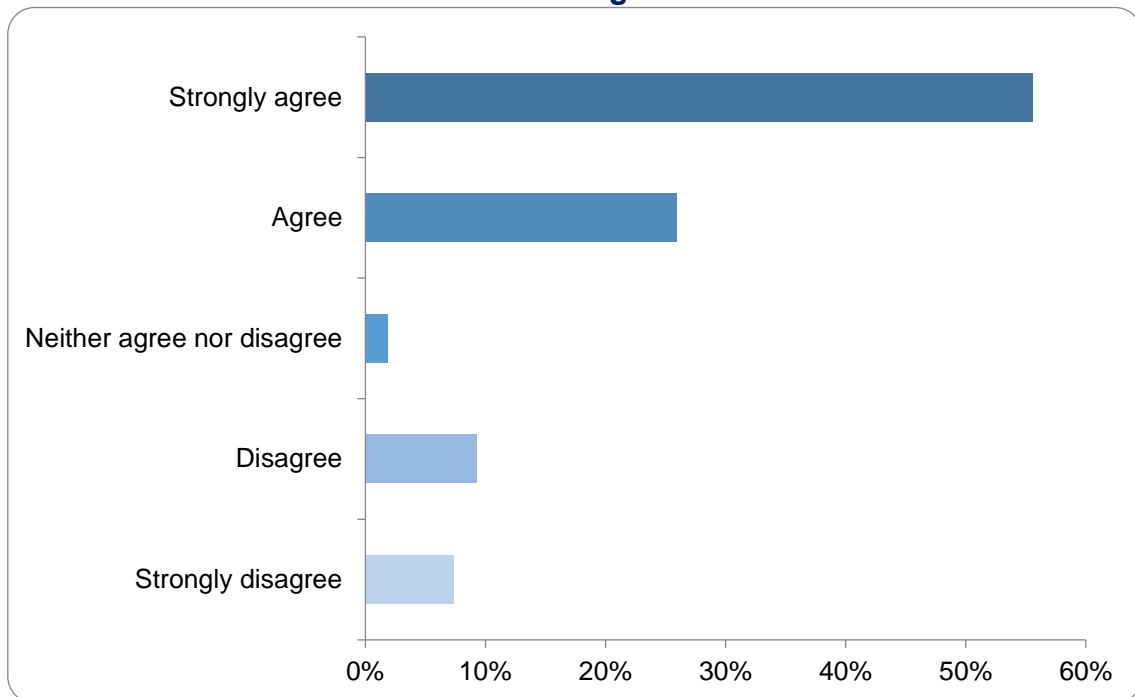
Policy NH6 – Valued landscapes

Full Survey: Which option do you prefer?



Of the 56 people who responded to this question, 88% preferred Option A. 534 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 54 people who responded to this question, 82% either agreed or strongly agreed with the proposed draft policy wording. 536 people did not answer.

Full Survey: Summary of main issues raised

- Overall the comments support the policy, the protection from harmful development that the policy gives to the landscape, and the decision to have a dedicated landscape policy (as opposed to a coverage in a more general environment policy as in the adopted South Oxfordshire Local Plan). There was also support given to the protection of the gaps between settlements, which respondents felt should be retained.
- Landscape was seen to be an important consideration, its value not just being derived from its physical appearance, but its multifunctional benefits. Due to the importance of landscape, there was a request that the policy is located earlier in the plan.
- There were comments that the matters contained in Policy NH6 are covered in other policies within the draft JLP and that all the landscape policies should be merged into one policy. Another commented that Local Plan policies should not duplicate national policy and guidance. This was furthered by other respondents who were concerned that the policy contradicts national policy by seeking to protect all landscape, and those who suggested the policy wording should be amended to 'minimise harm' or include reference to an 'internal balancing' exercise which requires the assessment of the identified level of harm against any proposed public benefits of a proposal.

- A comment was made that due to decisions made in previous plans the landscape and Green Belt land are not being protected.

Historic England welcomed this policy.

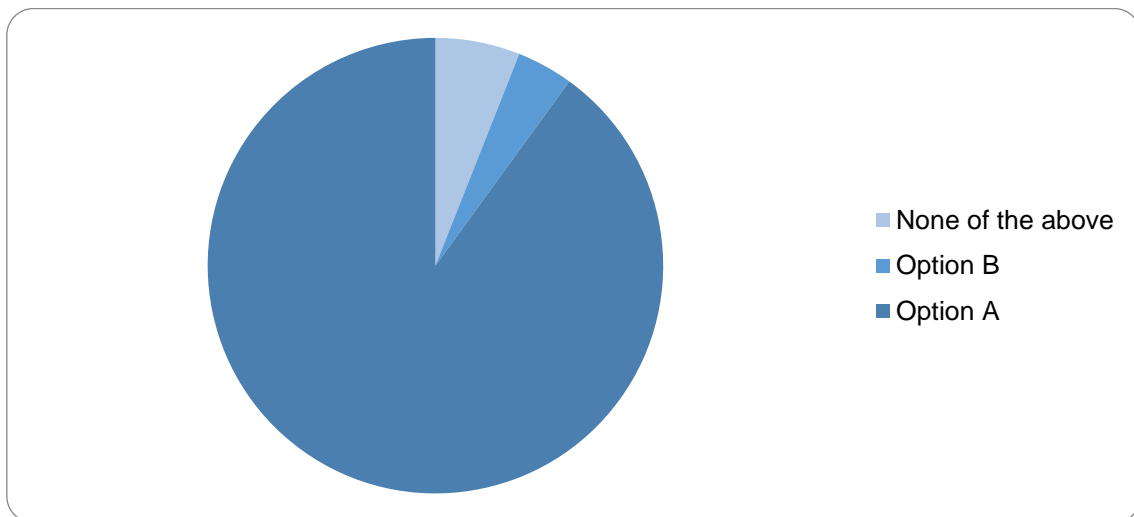
Oxfordshire County Council welcomed the update to the landscape character assessments, but added that the policy would benefit from additional detail regarding what information is required and how compliance would be assessed, as well as the inclusion of definitions of some of the terminology used.

How the main issues have been taken into account

Landscape was seen by the majority as a vital component of our districts, providing multifunctional benefits to our residents, with support for it being valued and protected as such. In order to provide clarity on what would be expected at the planning application stage, we added reference in the policy to a proportionate Landscape and Visual Impact Assessment or a Landscape and Visual Appraisal, with additional detail included within the supporting text.

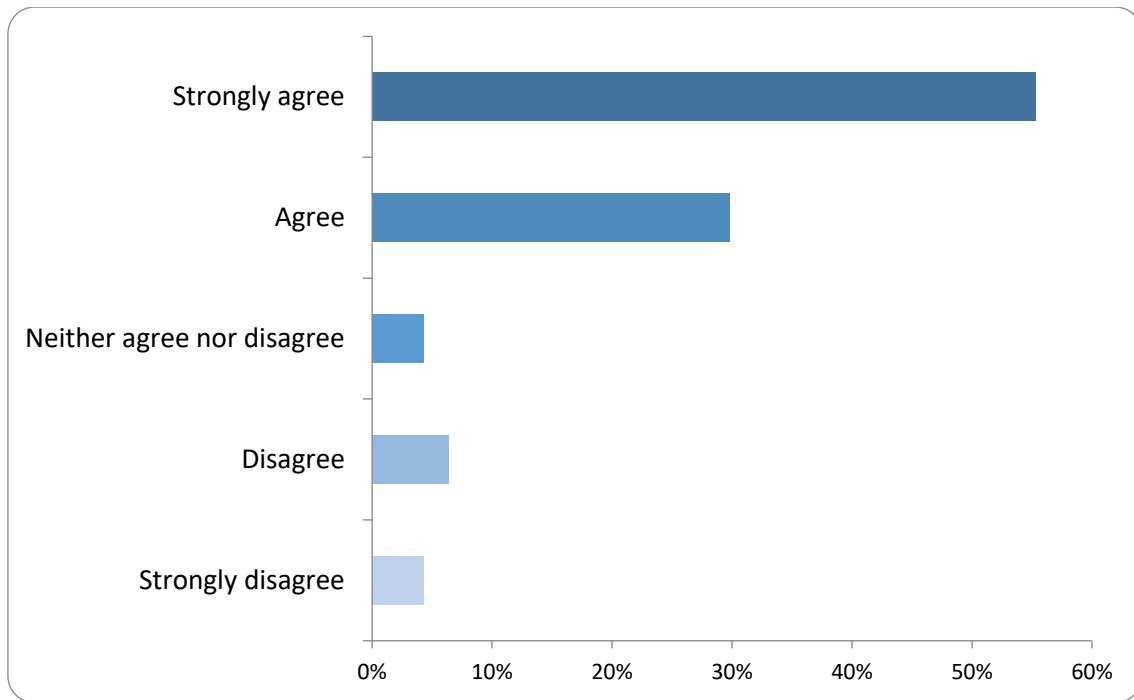
Policy NH7 – Tranquillity and tranquil areas

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 90% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 47 people who responded to this question, 85% either agreed or strongly agreed with the proposed draft policy wording. 543 people did not answer.

Full Survey: Summary of main issues raised

- The majority of respondents supported the proposal to create additional protection for landscape against unacceptable development and agreed there should be a policy which identifies and protects tranquillity.
- A point made multiple times was that the tranquil areas had not been defined when the Preferred Options Consultation was undertaken, with respondents interested to see the outcome, pointing out that tranquillity is a subjective but important quality. Others were concerned by the lack of evidence and advised it curtailed their ability to comment effectively.
- A few respondents wanted to see more consultation with local communities on the identification of the tranquil areas.
- There were some suggestions for specific parts of the districts which respondents thought should be designated as tranquil areas.
- Some respondents believed the policy duplicates national policy and guidance and is unnecessary and unreasonable. In addition, there were comments that the landscape policies should be merged into a single policy.

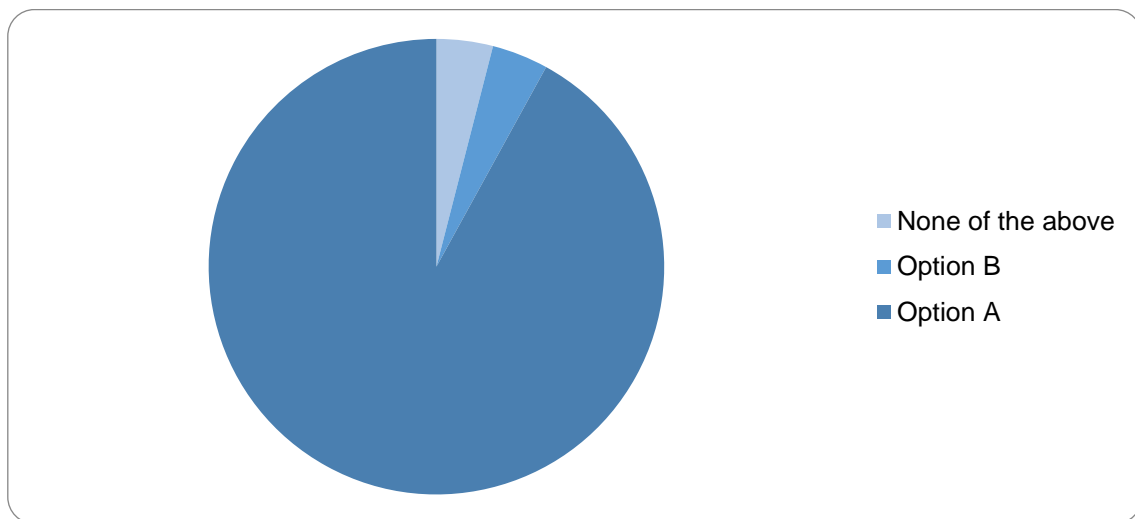
Oxfordshire County Council welcomed the inclusion of a policy on tranquillity and reiterate the importance of areas of tranquillity for mental health and wellbeing. They advised the policy should take account of existing guidance on tranquillity (by the Landscape Institute and LUC White Paper on Tranquillity Assessments) and define some of the terminology used.

How the main issues have been taken into account

The evidence base for tranquillity has now been completed, so the policy and associated mapping have been further developed. The process undertaken by the consultants followed best practice guidance, led by paragraph 191a) of the NPPF to identify and protect tranquil areas, and included workshops with key stakeholders seeking input and feedback into the methodology. The report has now been completed. The study concluded that in order to best protect and enhance tranquillity, 'tranquil areas' should not be designated; instead, relative tranquillity should be considered across the district when undertaking development. The policy is evidence led, and we have consequently amended the policy to focus on both protecting and enhancing tranquillity in the areas shown to be 'most tranquil' (zone 1), but also requested that tranquillity is considered and enhanced in all areas of the district (zones 2-5).

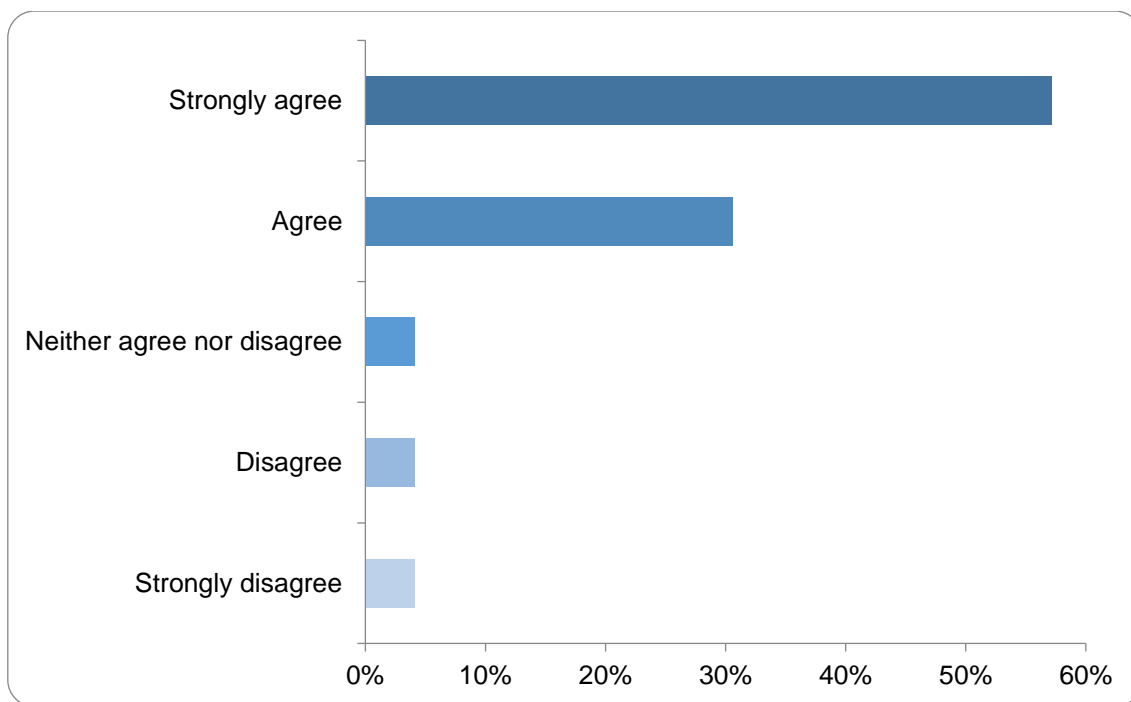
Policy NH8 – The historic environment

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 92% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 49 people who responded to this question, 88% either agreed or strongly agreed with the proposed draft policy wording. 541 people did not answer.

Full Survey: Summary of main issues raised

- The historic environment contributes significantly to character and must be considered when planning future developments.
- Some say local policies on the historic environment are essential others say there is no need for local policy as national policy covers this.
- Delete the policy as it varies slightly from the NPPF requirements.
- Mention links to climate change and biodiversity.
- Give more weight to the community and social value of heritage
- Suggest stronger wording, to be amended to 'will be required' from 'expected to' in criterion 8.
- Suggest this policy mentions the development of locally listed buildings and structures.
- Suggest the reference to the records held on the Oxfordshire Historic Environment Record (HER) as being considered historic assets. They stated that the HER contains records of all different types, and this should be clarified as could elevate incorrectly the number of heritage assets that need to be considered.
- Agree with the principle of preserving valued buildings and areas (as historic assets).

Historic England queried the inclusion of a definition of heritage assets in policy and noted that it is a broader explanation of heritage assets than is contained in the NPPF. They recommended deleting lines from the policy and adding them into the supporting text, beginning with a reference to the definition of heritage assets that is in the NPPF. They also recommended adding reference to a whole building

approach and the (potential) need for heritage expertise under Part 7. Further suggestions were made for additions to supporting text.

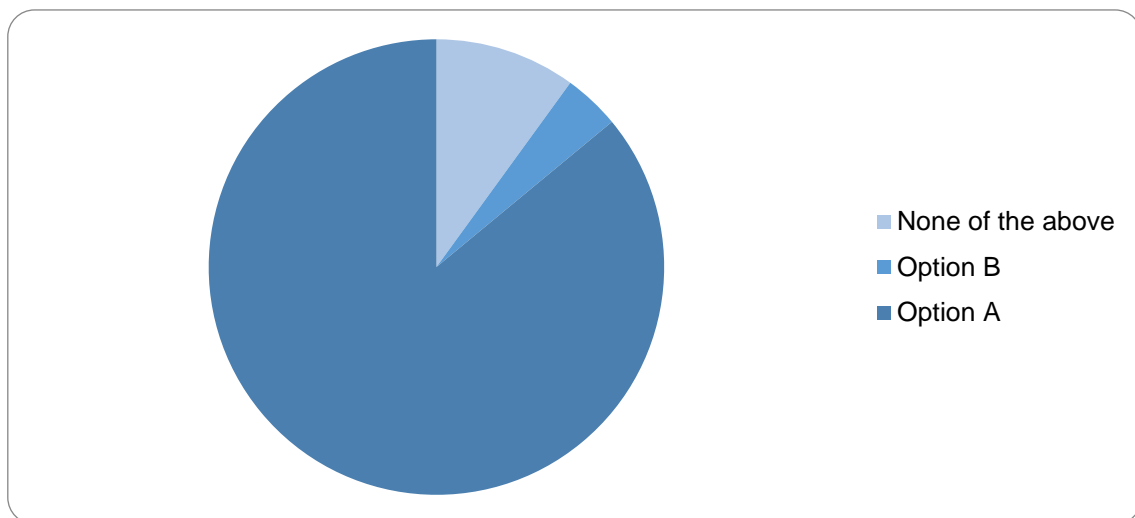
Oxfordshire County Council supported Option A. They suggested Part 4 to highlight the position of County Historic Environment Record as the main source for information on undesignated heritage assets of archaeological interest so that it is not overlooked when assessing the presence of non-designated heritage assets.

How the main issues have been taken into account

The historic environment's contribution to character is considered through this policy as well as through the design policies in the Joint Local Plan. We have included local policies on the historic environment in the Joint Local Plan as we are required by the NPPF to set out a positive strategy for the conservation and enjoyment of the historic environment. Encouragement for Neighbourhood Plans and Conservation Area Appraisals to identify assets to add to the local list has been included within the supporting text. Additional text has been included within the supporting text to highlight the important community and social value of heritage. Rather than mentioning links to climate change here, we have a policy on the historic environment and climate change (Policy NH13 (Historic Environment and Climate Change)) which brings together these topics.

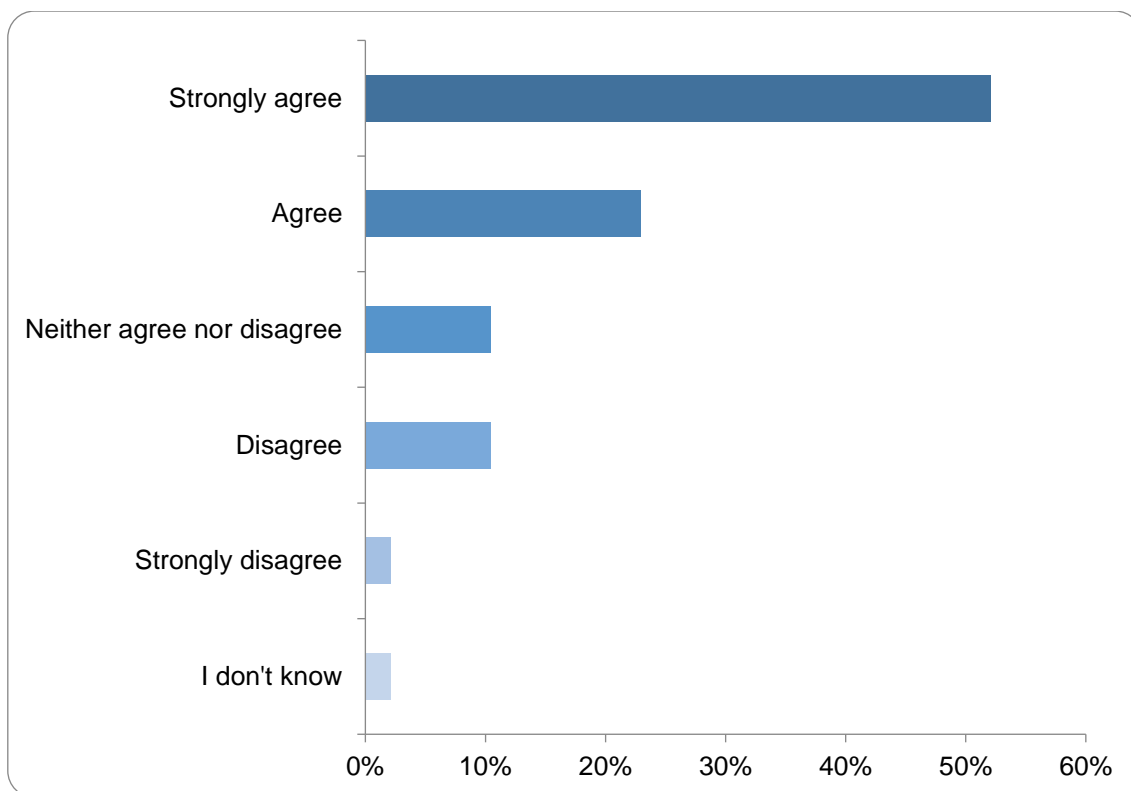
Policy NH9 – Listed Buildings

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 86% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 48 people who responded to this question, 75% either agreed or strongly agreed with the proposed draft policy wording. 542 people did not answer.

Full Survey: Summary of main issues raised

- There should be a focus on energy efficiency/retrofit. Current restrictions need to change to address the climate emergency.
- There should be more flexibility to update listed buildings to improve energy efficiency and/or to permit renewables.
- There is no mention of new developments overcrowding the historic environment.
- Design must reflect the local historic context.
- The policy only talks about the buildings and not about protecting other elements of the historic environment e.g. road furniture and road layout.
- There is no need for local policy as national policy covers this.
- Policy varies slightly from the NPPF requirements.
- Changes to listed buildings should be considered where access for the disabled is proposed to be improved.
- Address situations where listed buildings are damaged by neglect and inaction as well as development proposals.
- Question the need for separate policies for each type of heritage asset, but if they are to be separate policies, they should be set out in the order of the statutory hierarchy to enable efficient decision making.

Historic England recommended policy wording changes to clarify that setting contributes to significance and therefore is part of significance.

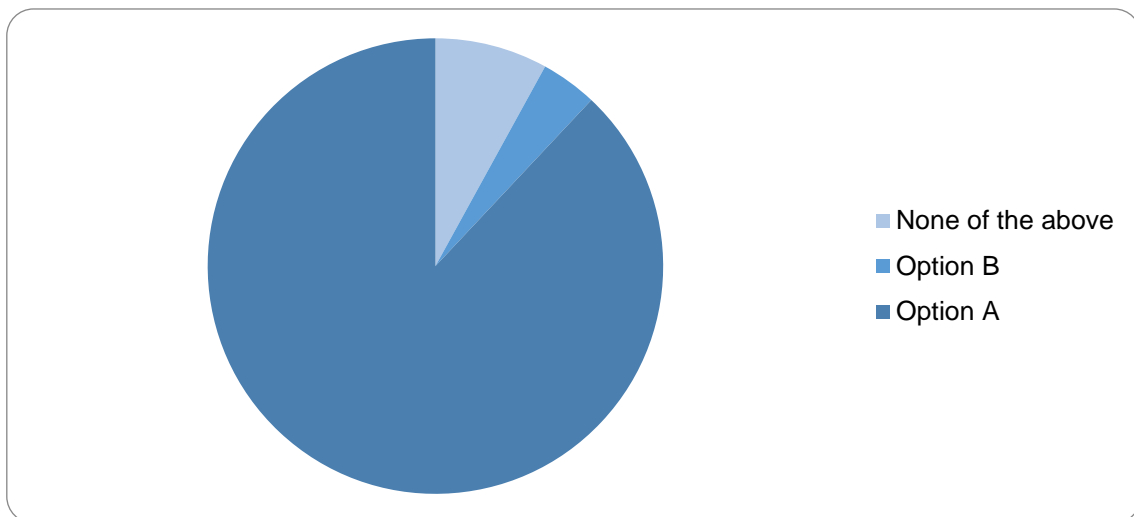
Oxfordshire County Council Archaeology team have already contributed to this policy and will continue to work with the councils in the preparation for the Regulation 19 version of the Joint Local Plan, as appropriate.

How the main issues have been taken into account

Listed Buildings are protected by legislation as well as national policy, therefore the draft policy cannot be too flexible as it must comply with those requirements. Rather than mentioning links to climate change here, we have a policy on the historic environment and climate change (Policy NH13 (Historic Environment and Climate Change)) which brings together these topics. Some of the suggestions are picked up by other policies in the Joint Local Plan, for example the design policies. We have included local policies on the historic environment in the Joint Local Plan as we are required by the NPPF to set out a positive strategy for the conservation and enjoyment of the historic environment.

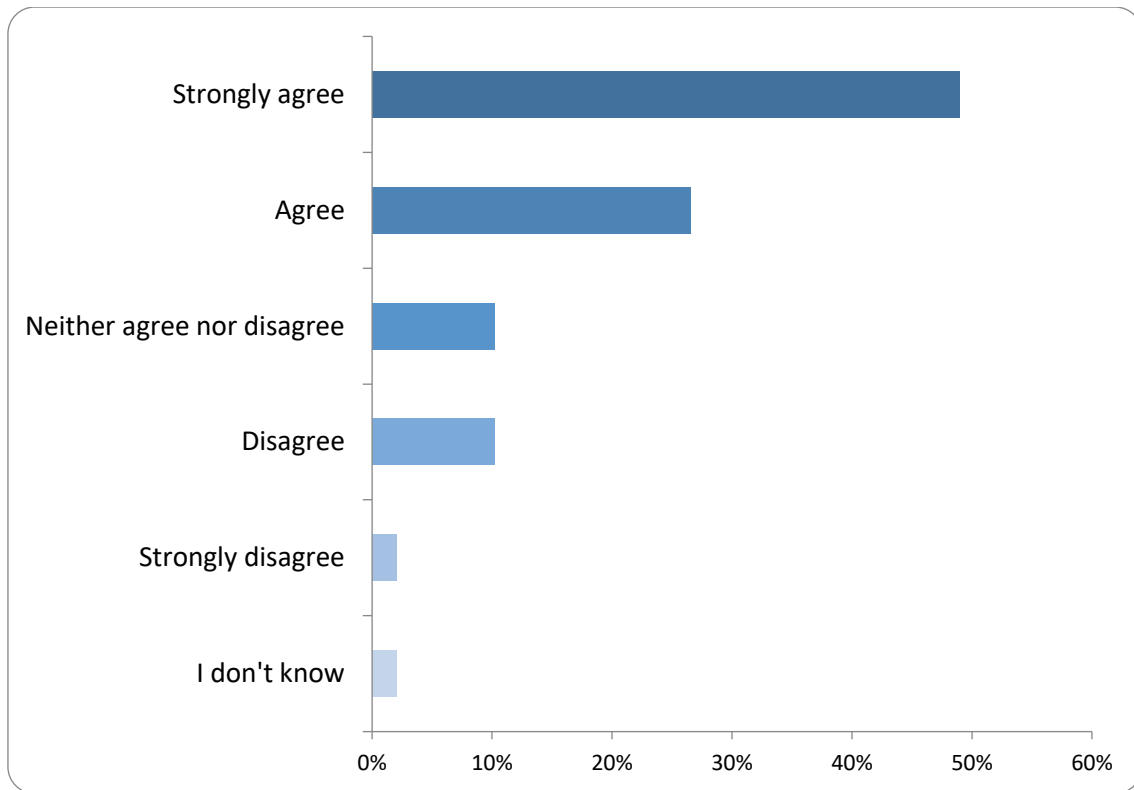
Policy NH10 – Conservations Areas

Full Survey: Which option do you prefer?



Of the 50 people who responded to this question, 88% preferred Option A. 540 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 49 people who responded to this question, 76% either agreed or strongly agreed with the proposed draft policy wording. 541 people did not answer.

Full Survey: Summary of main issues raised

- There should be a focus on energy efficiency/retrofit. Current restrictions need to change to address the climate emergency.
- Should reference policies in made neighbourhood plans.
- Greater emphasis needed on enhancing the conservation area and on Conservation Area Appraisals. Development has undermined the conservation area so there needs to be restoration as well.
- Substantial harm should require 'exceptional public benefit' not 'substantial'.
- Initial review into the level of protection/status of conservation areas prior to development interest would be good.
- Guidance for development immediately adjacent to a Conservation Area would be valuable. Planning applications for sites adjacent to conservation areas should state this and demonstrate no harm/mitigation of harm.
- There is no mention of new developments overcrowding the historic environment.
- The policy only talks about the buildings and not about protecting other elements of the historic environment e.g. road furniture and road layout.
- There is no need for local policy as national policy covers this. Delete the policy as it varies slightly from the NPPF requirements.

Historic England welcome the policy and its detailed approach. They queried whether a proposal could conceivably lead to "total loss" of the significance of a conservation area under Part 3.

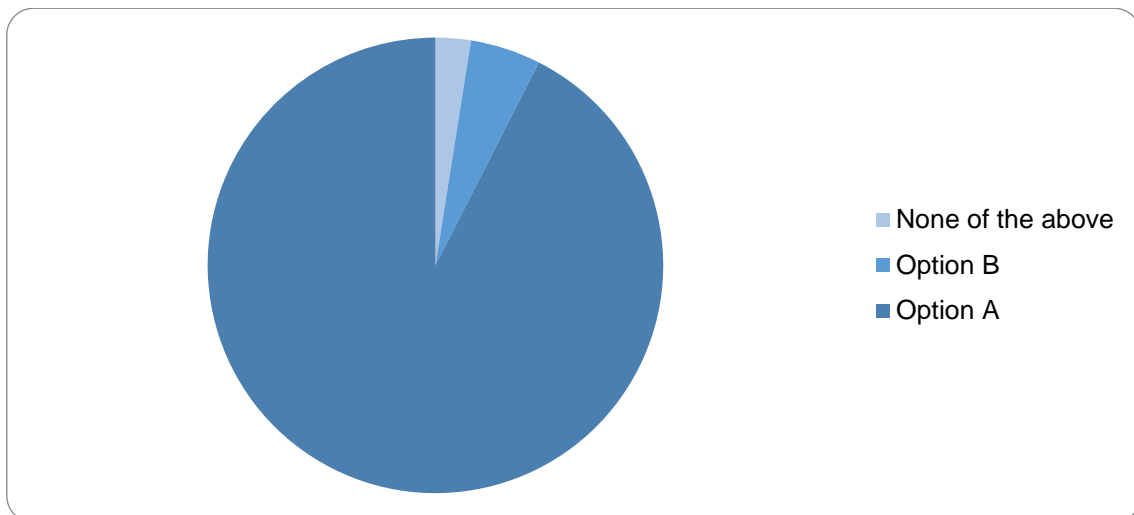
Oxfordshire County Council Archaeology team have already contributed to this policy and will continue to work with the councils in the preparation for the Regulation 19 version of the Joint Local Plan, as appropriate.

How the main issues have been taken into account

Conservation Areas are protected by legislation as well as national policy, therefore the draft policy cannot be too flexible as it must comply with those requirements. Rather than mentioning links to climate change here, we have a policy on the historic environment and climate change (Policy NH13 (Historic Environment and Climate Change)) which brings together these topics. Historic England have guidance available for development immediately adjacent to Conservation Areas and repeating them in the policy is considered unnecessary. Other elements of historic environment such as road layout are considered to be covered by references to setting.

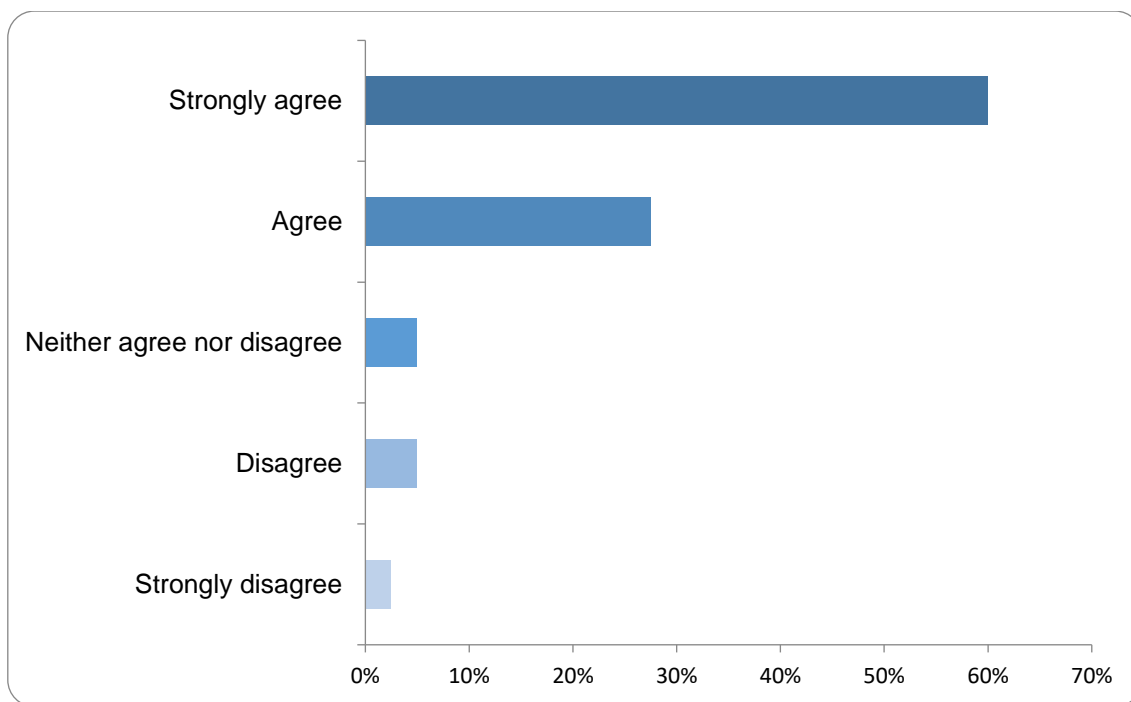
Policy NH11 – Archaeology and Scheduled Monuments

Full Survey: Which option do you prefer?



Of the 40 people who responded to this question, 93% preferred Option A. 550 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 40 people who responded to this question, 88% either agreed or strongly agreed with the proposed draft policy wording. 550 people did not answer.

Full Survey: Summary of main issues raised

- Strongly support the policy.
- There is no need for local policy as national policy covers this. Delete the policy as it varies slightly from the NPPF requirements.
- Historically important artifacts should be preserved and protected from developers.
- Greater emphasis needed on the social value.
- Part 1 should use the term 'significant' rather than 'important' to match policy and guidance.
- Reference under Part 1 to geophysical survey and trial trenching should be changed as there are other techniques that could be used.
- Change text under Part 2 to "Applicants must agree the scope of assessment and field survey/evaluation through a Written Scheme of Investigation (WSI) before the assessment/survey commencing".
- Points 5 and 6 should refer to 'nationally significant' to provide clarity.

Historic England proposed policy wording changes to avoid unnecessary repetition and to make the policy clearer.

Oxfordshire County Council supported Option A in general. They proposed minor policy wordings amendment for clarity in criterion 3 and 8.

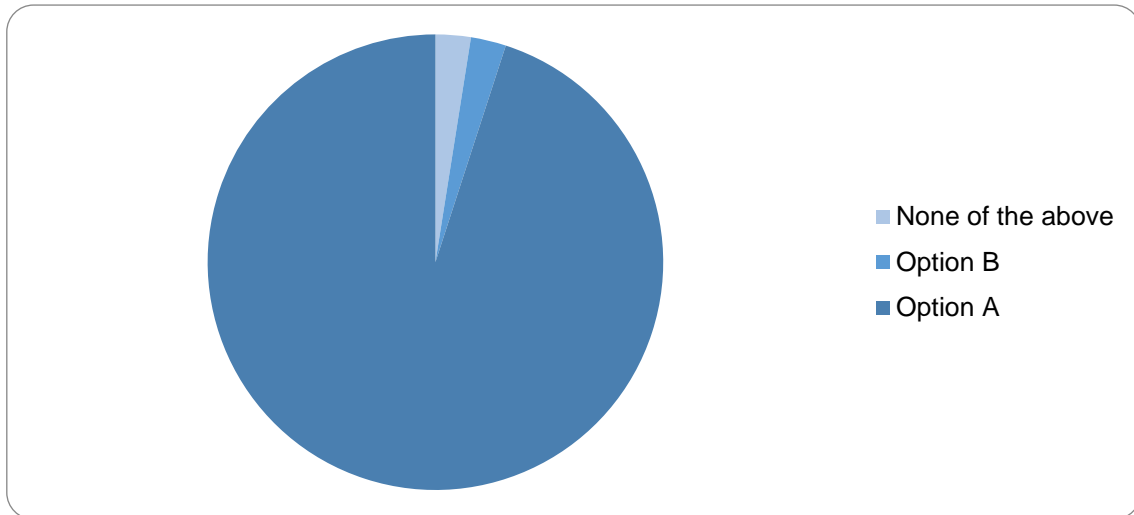
How the main issues have been taken into account

The policy adds value to the suite of policies to safeguard important sites and monuments of heritage significance. The suggestion to add specific methodologies such as WSI are considered too restrictive. Likewise, the reference to geophysical

survey and trial trenching has been removed from Part 1. Minor wording changes have been made in the policy text for Parts 3 and 8 in response to the county council's comments.

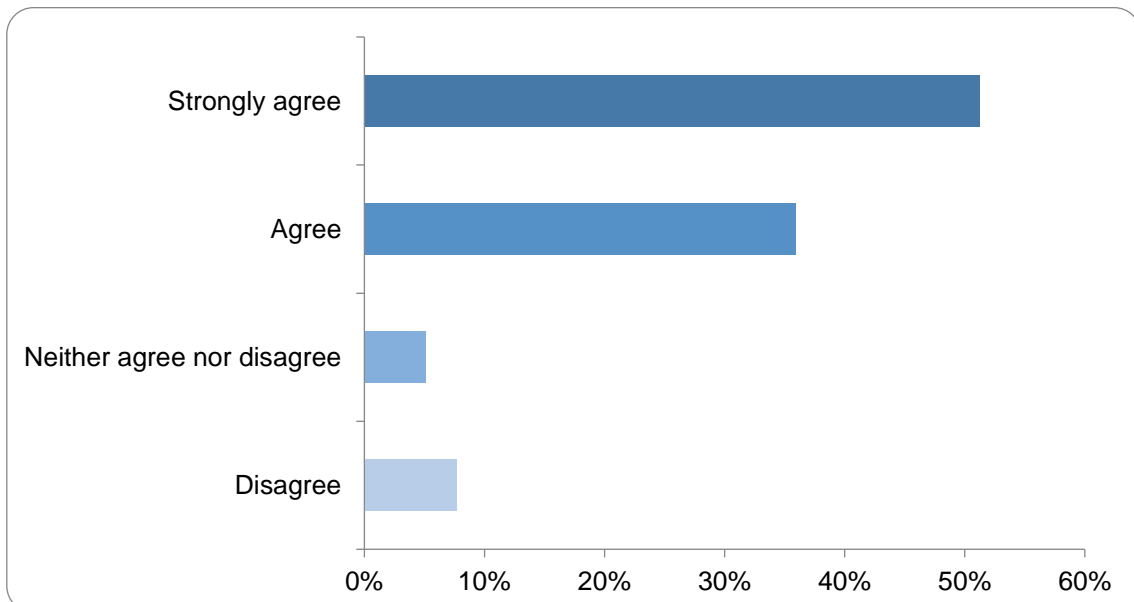
Policy NH12 – Historic Battlefields, Registered Parks and Gardens and Historic Landscapes

Full Survey: Which option do you prefer?



Of the 40 people who responded to this question, 95% preferred Option A. 550 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 39 people who responded to this question, 87% either agreed or strongly agreed with the proposed draft policy wording. 551 people did not answer.

Full Survey: Summary of main issues raised

- The Battlefields Trust would like to see an Article 4 Direction on the registered battlefield at Chalgrove.
- There should be reference to historic landscape assessments.
- There should be reference to hedges protected under the regulations.
- No mention in the policy of ancient woodland or well-preserved Ridge and Furrow.
- There is no need for local policy as national policy covers this. Delete the policy as it varies slightly from the NPPF requirements.
- There is no reference to NPPF paragraph 208 – update the policy to fully reflect the NPPF.

Historic England suggested expanding Part 5 to engage more clearly with certain issues that might arise in relation to development affecting historic battlefields and historic parks and gardens.

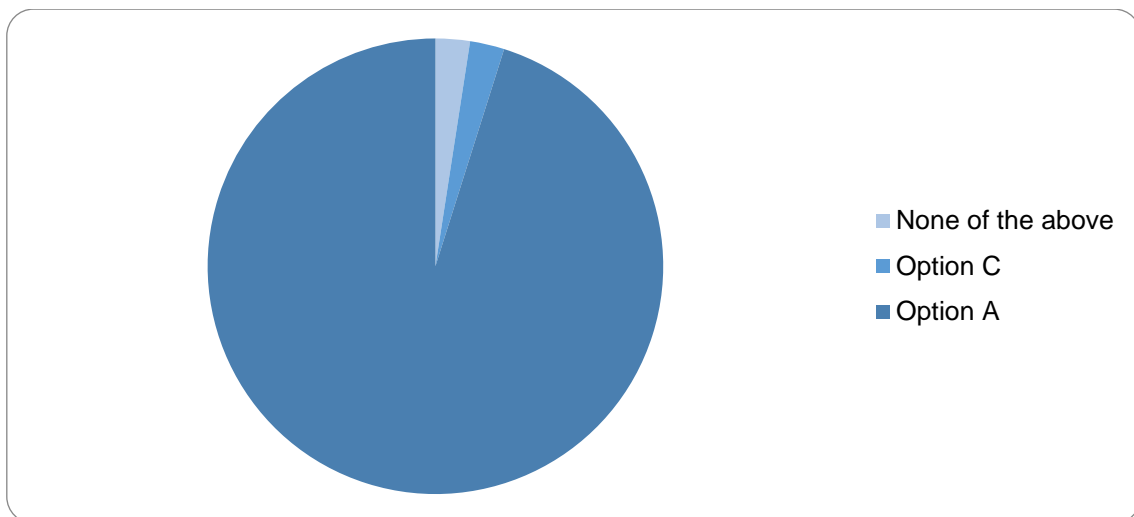
Oxfordshire County Council Archaeology team have already contributed to this policy and will continue to work with the Councils in the preparation for the Regulation 19 version of the Joint Local Plan, as appropriate.

How the main issues have been taken into account

The policy adds value to safeguard historic battlefields. Minor amendments have been to the policy text to reflect specific details in Part 5 in response to Historic England’s comments. Additional criterion has been added to reflect the thrust of NPPF paragraph 208. Comments relating to hedges, ridge and furrows are covered in other policies in the Local Plan.

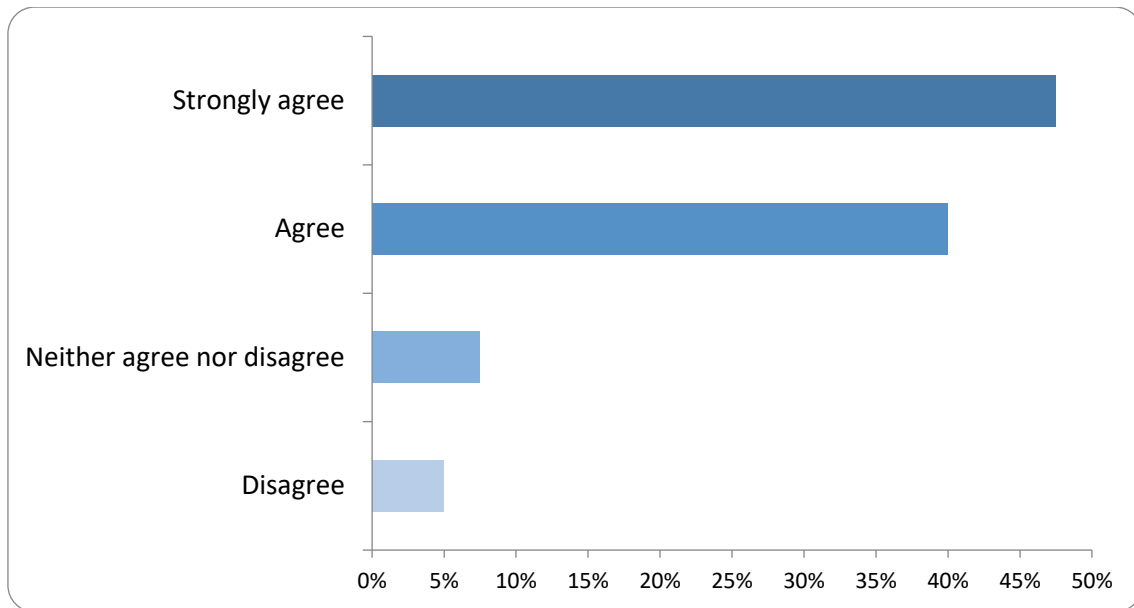
Policy NH13 – Historic environment and climate change

Full Survey: Which option do you prefer?



Of the 41 people who responded to this question, 95% preferred Option A. 549 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 40 people who responded to this question, 88% either agreed or strongly agreed with the proposed draft policy wording. 550 people did not answer.

Full Survey: Summary of main issues raised

- Support the strong commitment to carbon reduction in the plan and the inclusion of this policy.
- Mix of policy Options A and B would be preferred.
- Could the policy go further (including through guidance).
- Could explain that historic buildings will be encouraged to address the impact of climate change e.g. protection from extreme weather events.
- There should be greater support for the retrofitting of historic buildings as there are currently strong barriers.
- Living conditions and running cost is high where renovations are denied. Would like to see improving insulation of properties becoming easier.
- Policy should set out that modern energy efficiency measures should not be used.
- Mention recycling of historic materials where possible.
- Suggest deleting the second sentence on embodied carbon.
- Non-designated heritage assets have wider permitted development rights and form part of historic environment. Check that the policy and supporting text reflect this.
- There should be no permitted development.
- There is no need for local policy as national policy covers this.

Historic England recommended revising the wording to make sure that the policy does not have unhelpful generalisations. They also flagged that the retention of historic buildings is not solely tied to the issue of embodied carbon and proposed including a cross-reference to the other heritage policies. They also recommend that Policy NH13 is deleted and for the JLP to instead incorporate provisions (including prioritising the retention and reuse of existing historic buildings as a sustainable

resource and maximising opportunities to improve the energy efficiency of historic buildings) into the relevant net zero policies in Chapter 4.

Oxfordshire County Council Archaeology team have already contributed to this policy and will continue to work with the councils in the preparation for the Regulation 19 version of the Joint Local Plan, as appropriate.

How the main issues have been taken into account

The impact of climate change on the historic environment is increasingly recognised. The policy is complementary to climate change policies in Chapter 4. There is value in the retention of this policy as it looks at historic environment as a whole. Minor changes have been made to strengthen the policy text in response to the comments particularly in areas of retrofitting, reuse of materials and traditional construction method, including ensuring there are no unhelpful generalisations. ‘Embodied carbon’ has been retained on the advice of Historic England. Reference has been included within the supporting text to highlight the importance of ‘whole building approach’.

Other general comments regarding Chapter 12: Nature recovery, heritage and landscape

Full Survey: Summary of main issues raised

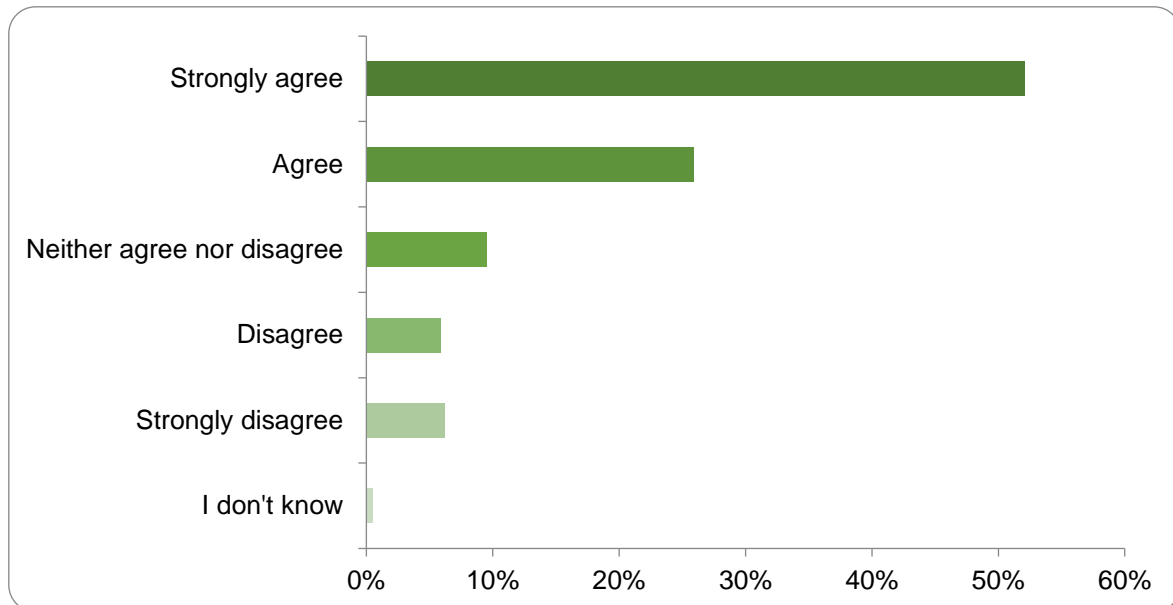
- Some respondents stated that while the protection and enhancement of the natural and historic environment is important, the policies should not prevent the delivery of development.
- One respondent suggested the policies in this chapter should be strengthened, and that the chapter should be moved to earlier in the plan to reflect the importance of Nature recover, heritage and landscape.
- One respondent suggested that each type of heritage asset does not need its own policy.
- One respondent suggested that there is scope for landscape-scale projects to be addressed through strategic policy in the Joint Local Plan.
- One respondent suggested the River Thames should be mentioned throughout the chapter.

How the main issues have been taken into account

The viability of the Joint Local Plan as a whole, and each allocated site in particular, has been tested through the Viability Assessment. While the wording of all policies has been reviewed. All of the policies in the development plan will apply in the determination of planning applications, regardless the position of the chapter in the Joint Local Plan. We consider it is appropriate to contain a suite of policies covering different heritage assets due to the importance of the historic environment in the districts. Large-scale landscape and green infrastructure projects have been considered through our evidence base documents. References to the River Thames have been made where relevant.

Infrastructure, transport, connectivity and communications

Nutshell (Section 8): How far do you agree or disagree with the Joint Local Plan encouraging walking, cycling, buses and trains when planning for further travel?



Of the 630 people who responded to this question, 78% of people either agreed or strongly agreed with the Joint Local Plan encouraging walking, cycling, buses and trains when planning for further travel. 52 people did not answer.

Nutshell (Section 8): Other comments on transport and travel

318 people answered this question.

Respondents to this question commented on a broad range of transport and travel related matters. The largest number of responses were focussed on the need to consider active travel options for those who cannot walk or cycle and the need for regular and reliable bus services.

Many respondents suggested that people are still dependent on cars and expressed concerns over an anti-car stance. Cars are considered necessary for those with access needs and will always remain a convenient choice, particularly where there is a lack of practical alternatives or a car is needed for an essential journey / reason (e.g., trade work, families). For that reason, respondents felt that it is necessary to continue to plan for cars and not restrict car movement, which may have negative impacts. A few respondents highlighted a need for more car parking in rural areas where people may be more reliant on cars for access. Respondents suggested incentives to move away from car use for those that can reduce usage in favour of more sustainable transport modes.

To get people away from reliance on cars, it was felt that public transport needs to be reliable and affordable (for both bus and rail). Improvements should be prioritised and should include increased frequency and improved timetabling. More buses are

considered necessary, particularly in smaller / rural settlements where better transport links are required. A lack of bus routes was highlighted as an issue. A large number of respondents felt that it is necessary to improve links between towns and villages to support active travel, with better transport links also needed across the districts as a whole. Use of buses should be encouraged, and there should be better connectivity between transport modes to encourage multi-modal travel journeys; particularly between public and active travel modes, where bus and cycling should be integrated.

Many respondents felt that active travel improves health and wellbeing and should be encouraged and increased, but improvements are required. For instance, cycle paths are inadequate and should be improved to enhance connectivity and address safety concerns. In some cases, respondents thought that cycle paths should be segregated from vehicles and footpaths. A few respondents commented that a good network of cycle lanes is developing, although a local strategy and ongoing maintenance are needed. It was thought that specific links between areas should be enhanced by cycle paths. There was some hesitation with whether cycling is for everyone, with a couple of respondents suggesting that it will never be adopted by all as a way of life, and that there are some people who are physically not able to cycle.

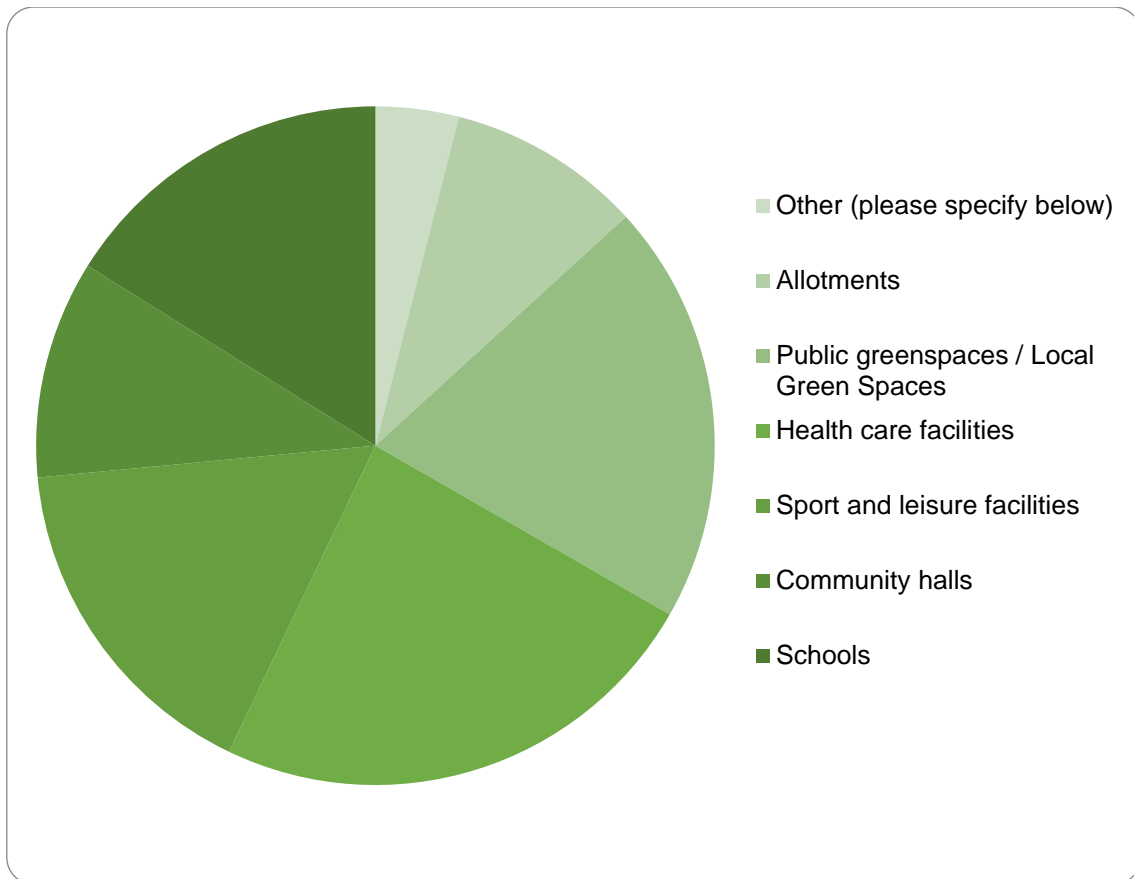
With respect to footpaths, respondents generally felt the same as other travel modes; more, better quality, segregated and well-maintained footpaths are needed to improve connectivity. Some responses indicated concern for pedestrian safety which should be addressed to increase take up.

When planning new public and active travel networks, it was considered that users should be involved in the process, and provision needs to be delivered from the start of any new development.

Some respondents felt that the need for travel should be reduced by the colocation of housing, employment, and other local facilities, and that any transport infrastructure required by new development should be provided by the developer. Nonetheless, it was considered necessary by some to focus on improving the existing infrastructure, which needs to be better joined up. Responses highlighted the inadequacy of existing road networks, which were considered beyond capacity and in need of repairs and maintenance. In some cases, respondents felt that no new roads are required, and where they are delivered, they will only generate more traffic. Some respondents thought that a new station at Grove is needed.

A number of comments were made with regard to allocated sites and areas within the district, such as Abingdon and Didcot. On the whole, respondents raised the same general issues as above, but flagged specific concern with respect to identified locations and necessary improvements in their local area.

Nutshell (Section 9): What type of community infrastructure would you like to comment on?



Respondents indicated that they wanted to comment on a range of community infrastructure. Each respondent was able to select multiple options to this question. The most selected option was health care facilities, followed by public greenspaces and schools.

Nutshell (Section 9): Please tell us if you have any comments on our district’s infrastructure needs, including any ideas you have about what is needed to support new development in our area or anything else you think we should consider

396 people answered this question.

The largest number of comments received with respect to community infrastructure were regarding the provision of health care facilities. Many respondents highlighted the need for more health facilities (including GP surgeries and dentists), with particular reference to the need for greater provision in Abingdon, Chinnor, Crowmarsh, Didcot, Henley, Shrivenham, Wallingford and Wantage. Health facilities were considered too concentrated in Oxford. Respondents felt that it should be necessary to ensure there is enough capacity in the districts to support the increase in population, with necessary health facilities delivered before housing. Some respondents expressed the need for health facilities to be delivered for all housing developments above a certain size, with it being essential to deliver them on new major developments. Health facilities were considered under too much strain / pressure, with an uncoordinated approach to delivery between authorities and a need to work closely with the Buckinghamshire, Oxfordshire and Berkshire West

Integrated Care Board to facilitate commencement of health facility development. Some respondents suggested the provision of health services in flexible spaces and hubs, flagging the need for better access to facilities, including primary care services and hospitals. There should be better access to health facilities, including good parking.

A large number of respondents also raised the need to protect, extend and / or provide more green space, which some felt was being lost through the Local Plan. Green space was considered necessary for health and wellbeing and important for sport use. Comments suggested that the benefits of green space should be maximised to enhance sustainability, biodiversity and accessibility. It was thought that spaces should be well maintained and available for use all year round. A number of respondents raised the need to consider how green spaces are developed; all developments should have green space with proposals for minimum amounts of green space to be delivered as part of any development. Others thought it should be part of all community facilities and should be funded from community fees instead of management fees. Some comments requested more allotments and dog walking areas. With respect to ownership, it was felt that green space and play areas shouldn't be retained by developers and should be offered to local groups (including Town / Parish councils) to manage and maintain.

Many respondents highlighted the lack of leisure facilities, which they considered important and an integral part of new development. Some respondents suggested that some facilities are inadequate and/or under used but it is important that existing provision is not lost. Sport and leisure provision helps prioritise health and wellbeing, with some respondents suggesting that facilities should be delivered alongside healthcare facilities. Facilities should be affordable, well connected, accessible and suitable for all ages, with a need for more facilities for young people. Respondents commented on the need for public pools, all weather sports facilities, more multi-use facilities close to new housing and larger facilities. Specific locations were referenced, including Didcot, Chinnor, Crowmarsh, Faringdon, Henley, Wallingford and Wantage.

There were a number of comments stating the need to make sure there are enough schools, with increased education capacity to reflect population growth. Schools were considered to be under strain and in need of investment / modernisation, with a need for more provision, including secondary, pre-school, nursery and SEND provision. Some respondents highlighted that schools were a necessity and are needed at the start of development. Reference was made to the need for improved education in specific locations including Berinsfield, Benson, Chalgrove, Chinnor, Henley and Wallingford.

Respondents also felt that more community facilities were needed and should be provided by developers. Local provision of community facilities was thought to promote community cohesion, with respondents suggesting that facilities could be combined and / or co-located with other uses, such as health facilities and allotments. Facilities should be accessible by active travel and more sustainable. Some felt that hire was currently too expensive, and more management options

should be considered. Requirements were thought to differ between towns and rural communities, with some respondents stating the need to protect facilities in smaller settlements. More provision was considered necessary in some areas, such as Thame and Wallingford.

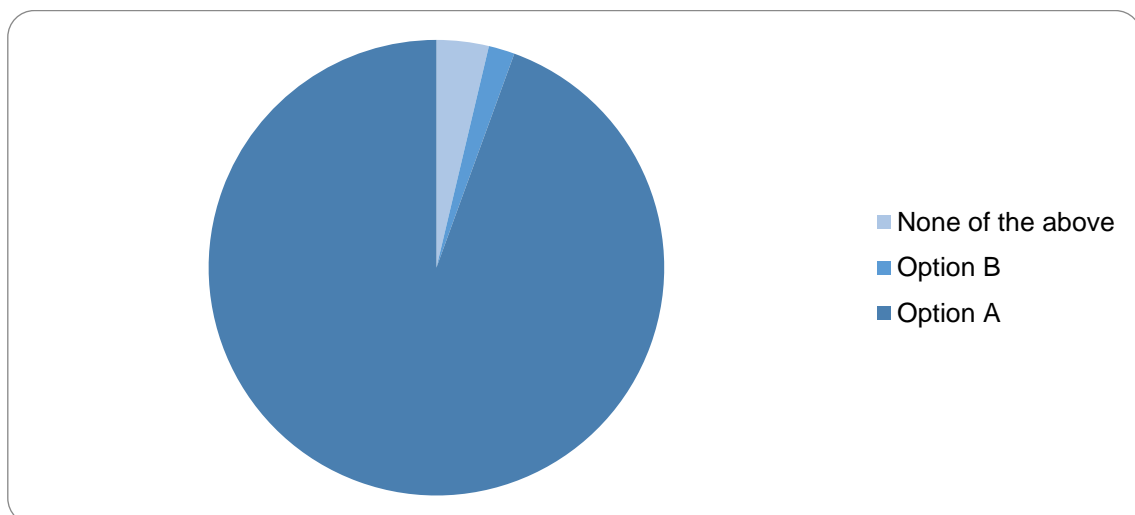
A large number of respondents highlighted the need for more allotments, which should be promoted due to their benefits as a food source and way to promote physical and social activity.

Respondents also referenced the need for more cycle paths, parking, play areas, public rights of way, improved public transport, commercial amenities and a better retail offer. Infrastructure should be accessible and meet the needs of the population as a whole.

A very large number of respondents made general comments about infrastructure provision, including the need for upfront delivery and no further development until there is sufficient provision. Respondents felt that infrastructure should be proportionate to housebuilding and must be a top priority. Generally, it was felt that more provision is needed across the board, with all types of provision important when planning new growth. The location of new facilities needs to be well considered to reduce reliance on cars and promote health lifestyles. Some respondents also felt it necessary to review and improve existing facilities before more are provided. Local communities should be able to determine needs instead of developers, and developers should be held accountable when infrastructure delivery fails, instead of relying on others to provide facilities. Funding was identified as a critical issue to be addressed.

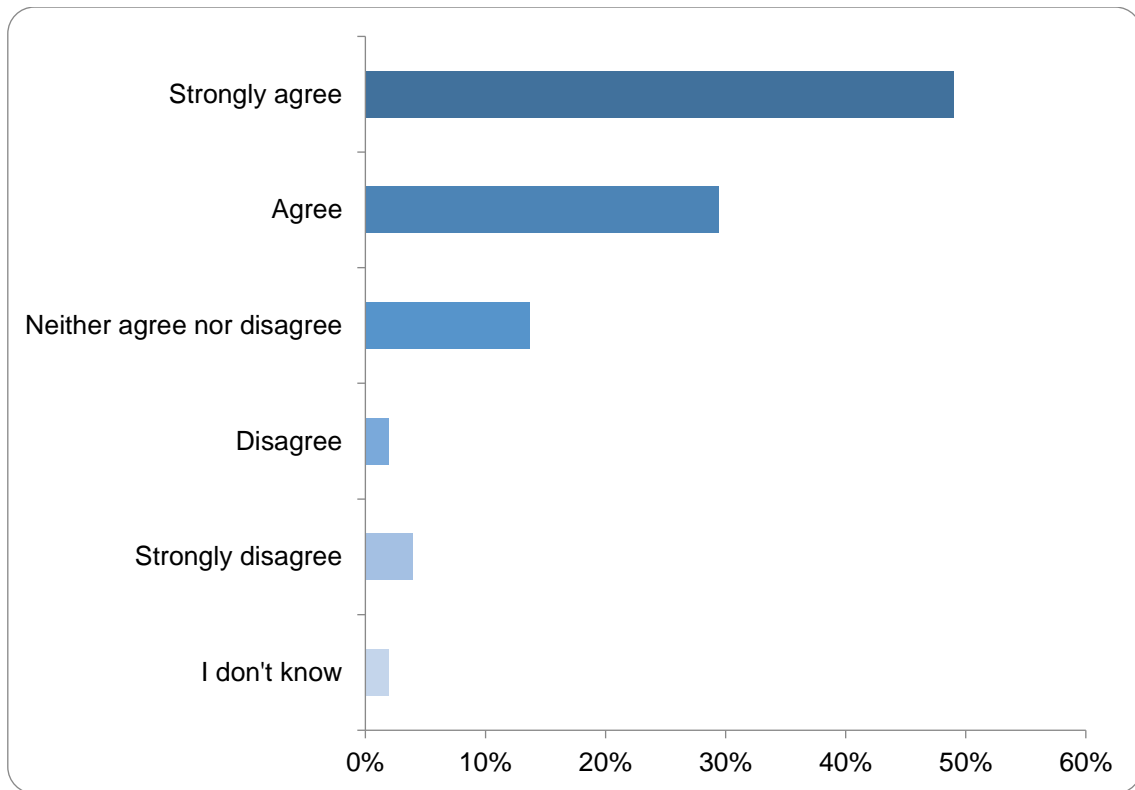
Policy IN1 – Infrastructure and service provision

Full Survey: Which option do you prefer?



Of the 54 people who responded to this question, 94% preferred Option A. 536 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 51 people who responded to this question, 78% either agreed or strongly agreed with the proposed draft policy wording. 539 people did not answer.

Full Survey: Summary of main issues raised

- We received a variety of comments on specific infrastructure projects or themes that commentors felt the policy should address / address more clearly:
 - The safeguarded land for Grove Railway Station should include all options until the business case for reopening the railway station has completed.
 - Utility infrastructure, including protecting existing utility infrastructure.
 - Health infrastructure, including the capacity of the National Health Service to meet the needs of new developments. The policy should also reflect that the south western corner of the Vale of White Horse district is covered by the Bath and North East Somerset Integrated Care Board.
 - Placing greater emphasis on active transport, and setting higher standards for it. The policy should consider how we can connect up cycling and footpaths, with more consideration given to how users of cycle infrastructure will actually experience a development when it is completed.
- Many comments supported the policy approach of ensuring appropriate infrastructure is in place at the right time. These comments support having conditions / clauses attached to planning permissions to prevent commencement / occupation of development until the infrastructure is in place, with some commentors suggesting we use Grampian conditions. This should include an assessment of the cumulative impact of development on

infrastructure, and address current infrastructure deficits. One commentator suggested that off-site highways infrastructure should be delivered by developers, rather than through them funding the Highways Authority to undertake the work.

- Conversely, some suggested that the policy wording should be carefully considered to ensure that existing shortfalls in infrastructure provision in an area do not require a development to address these as it could prevent development happening altogether. The policy should also clarify the difference between contributions from major and minor development proposals.
- One comment stated that infrastructure should be designed so that when infrastructure operators are carrying out repairs or maintenance, it causes minimal disruption.
- Some comments were supportive of town and parish councils being on the list of stakeholders to engage. Others, however, cautioned that local aspirations may not necessarily align with provision policies which are often set at a national level.
- One comment stated that there is a contradiction in policies promoting development at places like Harwell Campus and Culham Science Centre, while requiring developments to be within 15/20 minute walking and cycling of facilities.
- The policy's intention to secure infrastructure and services via planning obligations and conditions should be subject to viability and feasibility testing.
- The policy should be more ambitious and creative in its approach to securing service/infrastructure needs; no reference is made to the benefits of co-locating development and associated infrastructure.
- The policy should remove references to supplementary planning documents within policy. To do so conflates the statutory development plan with 'material considerations' and does not afford respondents the appropriate opportunity to comment.
- The JLP does not take into account the Oxford to Cambridge Arc. They acknowledge that the nature of government's commitment to the Arc has changed, it nonetheless remains a matter of government policy as demonstrated by the endorsement of the NIC report proposing the Arc, the establishment of the Pan-Regional Partnership and the commitment to East-West rail. The Arc is therefore an issue that the JLP needs to take into account, as per para 6 of the NPPF.
- There is a growing gap between the level of planned housing and economic growth and the availability of energy grid supply and water supply. They cited the two OXIS reports identifying infrastructure needs and called for cross-county collaboration to address this urgently. Without this, the climate change and renewable energy aspirations will be unattainable.

Thames Water suggested that issues covered in Policies CE8 and IN1 should be presented in a single 'Water Supply and Wastewater Infrastructure' policy. The JLP should seek to ensure that there is adequate water supply and wastewater

infrastructure to serve all new development. The time required to deliver new/upgraded infrastructure should not be underestimated. Thames Water suggested specific policy text.

Cherwell District Council commented on Housing Infrastructure Fund, suggesting little reference to the significance of the Homes from Infrastructure funding and its relationship with planned development and broader Oxfordshire relationships, such as the Knowledge Spine which connects Didcot-Oxford-Bicester.

NHS (Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board) welcomed this policy in general. They recommended that an early engagement, as set out in the Policy, should happen during the pre-application stage as set out in the NPPF.

Oxfordshire County Council identified some alternative text to clarify how infrastructure / financial contributions would be secured from developments.

NHS (Bath and North East Somerset, Swindon and Wiltshire) Integrated Care Board supported Option A that sets out the requirement for ensuring development to be served and supported by appropriate on-site and off-site infrastructure and services. They state the plan should identify health infrastructure as essential infrastructure, and set the expectation for developments to make provision to meet the cost of healthcare infrastructure needed by the development.

How the main issues have been taken into account

Many of the concerns were about the capacity of existing infrastructure to accommodate the rise in population. The Infrastructure Delivery Plan (IDP) sets out the infrastructure improvements needed from new development to mitigate its impact. Development cannot mitigate existing shortfalls in infrastructure provision as this would conflict with Regulation 123 of the Community Infrastructure Levy (CIL) Regulations 2010. The councils (alongside the relevant infrastructure providers) will carefully consider the timing and phasing of infrastructure delivery at planning application stage on our large scale sites, and agree this through a legal agreement (Section 106 agreement) with the applicant. Comments about specific types of infrastructure have been addressed by other policies in the JLP, the IDP, or evidence studies (such as the Leisure and Playing Pitch Strategies, and the Open Spaces and Green Infrastructure Study). Some infrastructure types (such as utilities and power) are not covered by planning, and are addressed through other legislative regimes, and so there is no policy coverage for these elements. However, the councils will continue to work with these operators / providers as part of the planning application process.

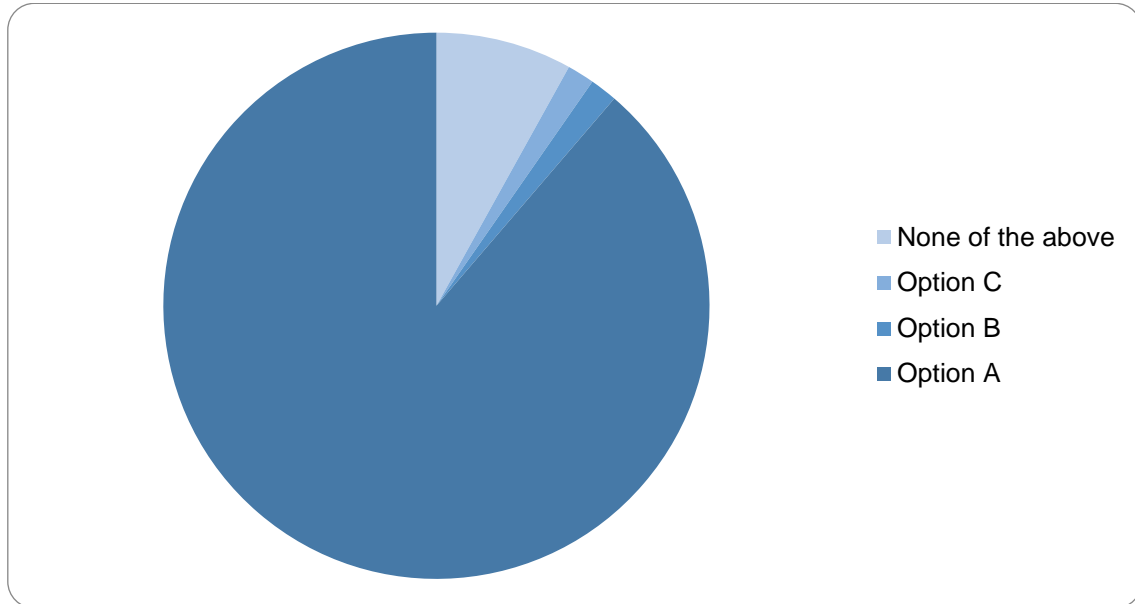
The councils do not consider that there is a need for a specific water policy as this is adequately addressed through other policies in the JLP and the IDP.

Policy IN3 safeguards land for the Housing Infrastructure Fund (HIF) schemes, and these are specifically referenced in the IDP and transport topic papers / evidence studies, and we agree that HIF1 is critical to ensuring that planned development related to that infrastructure can come forward. Healthcare infrastructure is

specifically referenced in Policy HP2 and the IDP, and so does not need references here.

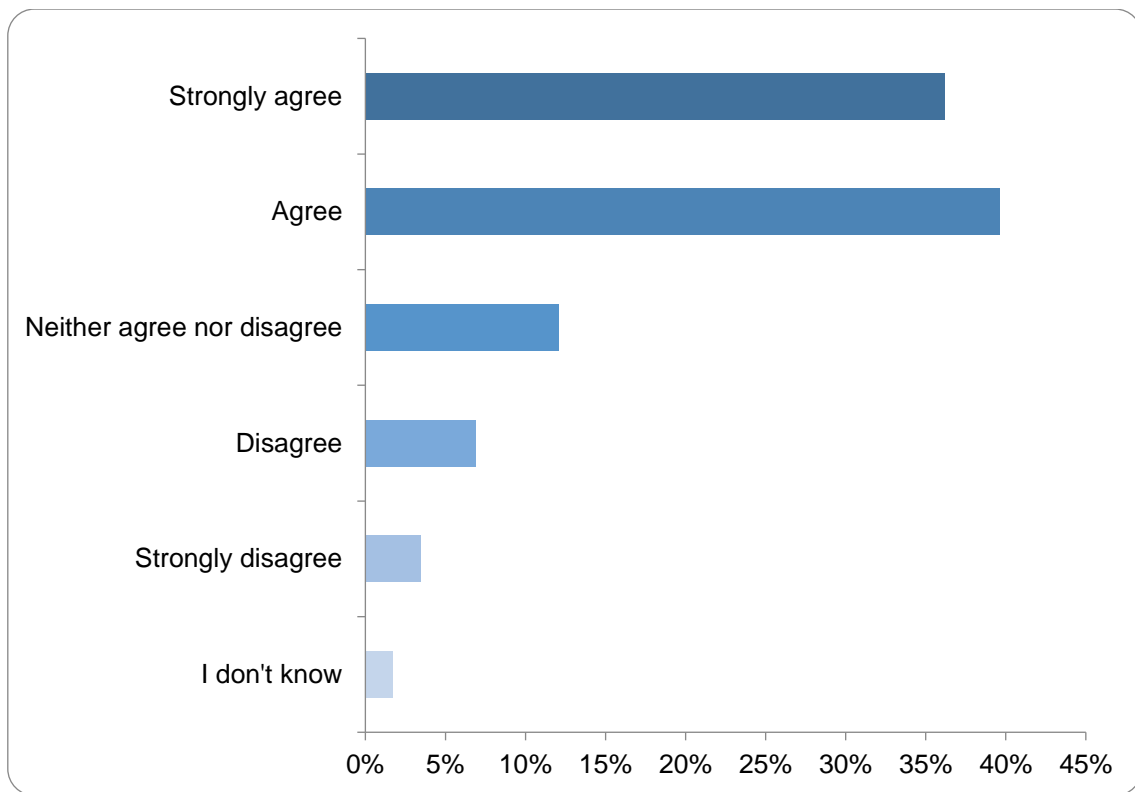
Policy IN2 – Sustainable transport and accessibility

Full Survey: Which option do you prefer?



Of the 62 people who responded to this question, 89% preferred Option A. 528 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 58 people who responded to this question, 76% either agreed or strongly agreed with the proposed draft policy wording. 532 people did not answer.

Full Survey: Summary of main issues raised

- Written responses showed overall support for this policy, with some highlighting the need to consider the rural nature of the districts.
- Responses encouraged prioritisation of active and sustainable travel and associated infrastructure, with an emphasis on the need for effective bus provision for more rural locations.
- Some key stakeholders requested opportunities for early engagement in the master planning process for major developments.

Oxfordshire County Council indicated support for the policy and requested additional content regarding Housing Infrastructure Fund 1 schemes and Cowley Branch Line. County also highlighted a conflict between the Local Transport and Connectivity Plans' Transport User Hierarchy and the districts Joint Design Guides' approach to Movement and Connectivity.

Oxford City Council stated their support for Option A and associated alignment with the LTCP.

How the main issues have been taken into account

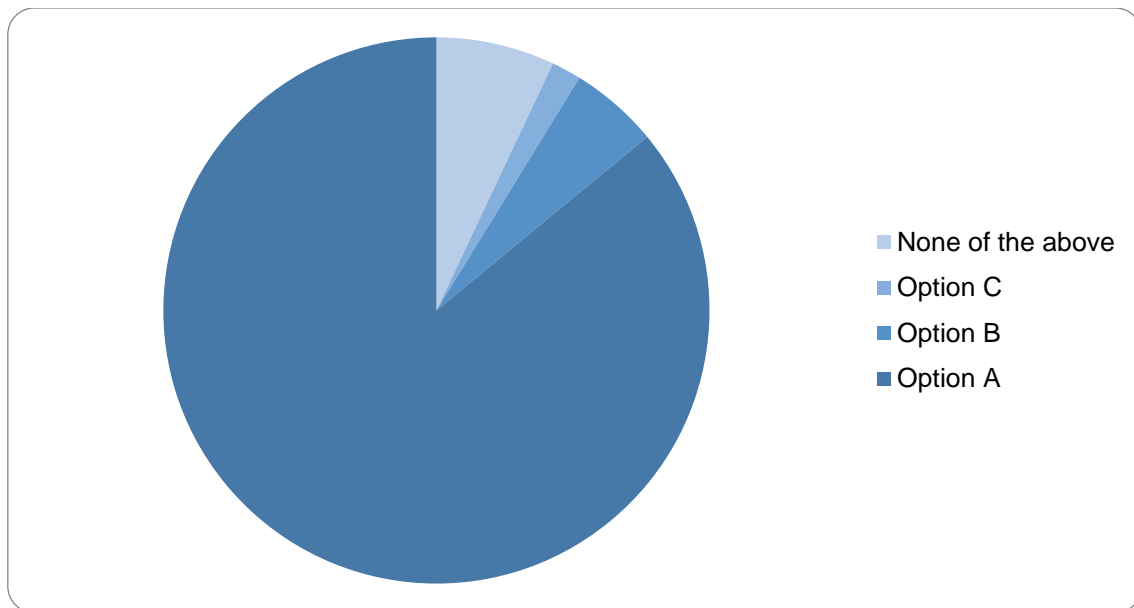
The draft plan's spatial strategy ensures that development will be located in more urban and sustainable locations across the districts. We have clarified how we will apply the policy in supporting text, giving more context for developers. The plan has identified land to safeguard for active and public transport schemes, and sets out how the councils will use the "Decide and Provide" for addressing the transport

impacts of developments. Collectively, these will ensure the councils and developers plan for active and sustainable travel.

We have included details of Housing Infrastructure Fund in the policy, supporting text and in the Infrastructure Delivery Plan (IDP). Both policies in the plan and the IDP allow for the councils, Oxfordshire County Council, developers, and any other stakeholders to identify any additional transport infrastructure as part of the planning application process. The emerging IN2 policy, which references the transport users hierarchy, will take precedence over the Joint Design Guide.

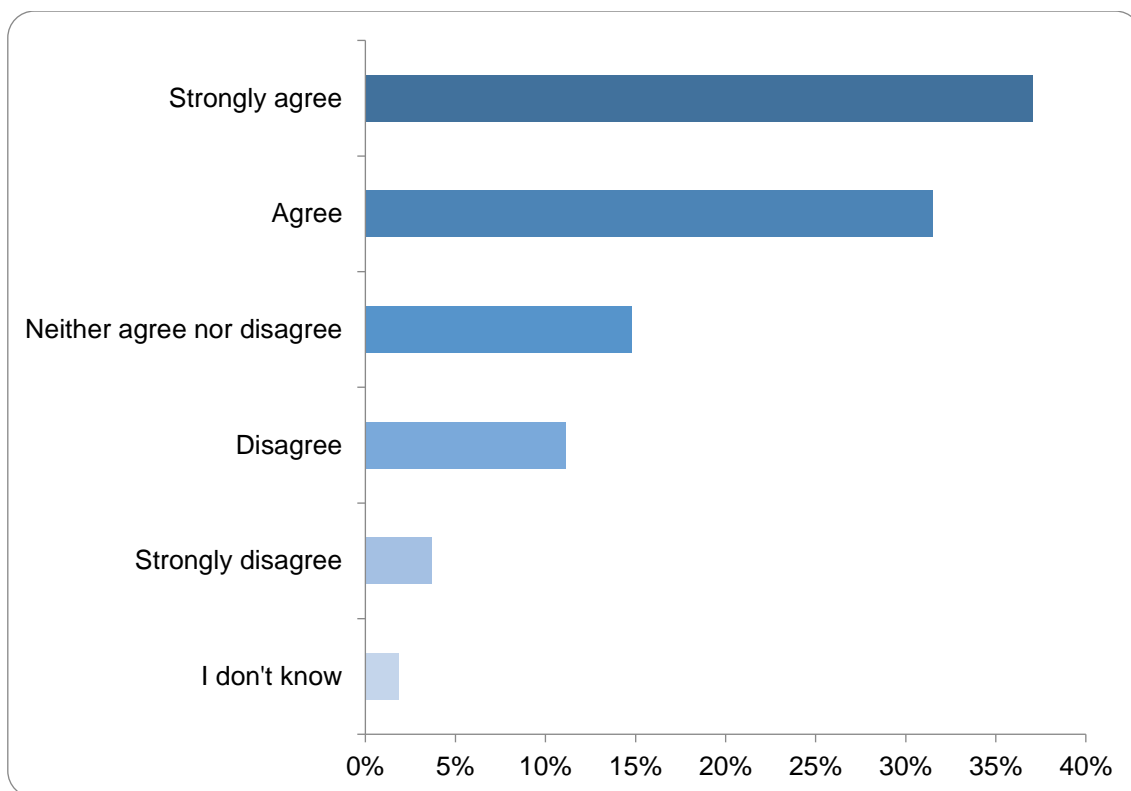
Policy IN3 – Transport infrastructure and safeguarding

Full Survey: Which option do you prefer?



Of the 57 people who responded to this question, 86% preferred Option A. 533 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 54 people who responded to this question, 68% either agreed or strongly agreed with the proposed draft policy wording. 536 people did not answer.

Full Survey: Summary of main issues raised

- Respondents support the inclusion of active and sustainable transport schemes, while some did not support the removal of the additional safeguarding locations for Wantage and Grove railway station.
- Responses indicated that some of the retained safeguarding schemes are not in keeping with the 'Decide and Provide' approach.
- Respondents highlighted the need to provide safe pedestrian crossings of key road infrastructure.
- Request to remove the mobility hub safeguarding site at Cumnor.
- Additional recreational routes are available across the districts which should be added to the policies map.
- There was support for improvements to the A34 and Watlington Relief Road.
- Responses suggested additional rail infrastructure and bus priority measures.
- The site owner for Dalton Barracks has requested additional transport safeguarding in relation to the allocated site.

Reading Borough Council requested inclusion of Cross-Thames Travel safeguarding and mobility hubs.

Oxfordshire County Council welcomed the cooperative working arrangement between the councils, particularly for inclusion of new safeguarding schemes in the development of the JLP and provided a range of suggested textual amendments.

Network Rail requested policy support for additional rail tracks between Didcot and Oxford.

Sustrans requested inclusion of the National Cycle Network Routes in our interactive mapping.

How the main issues have been taken into account

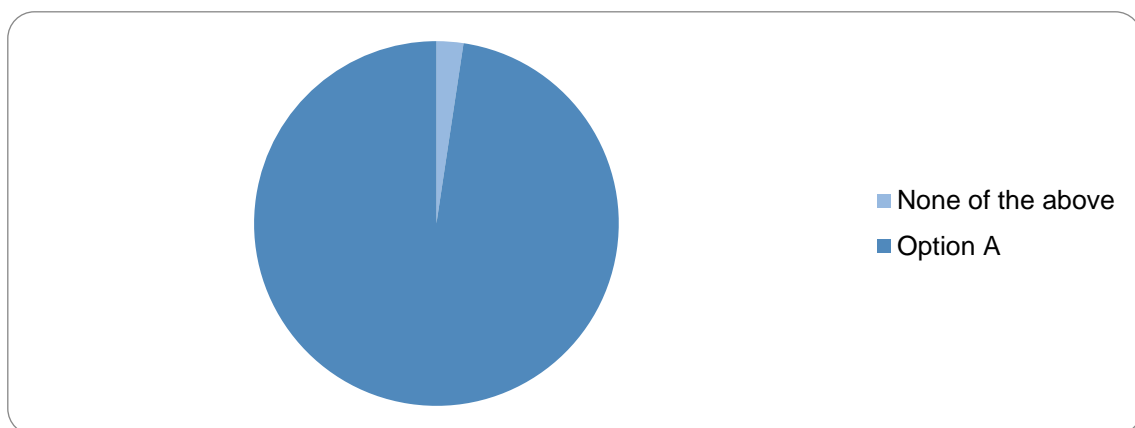
We have included a revised Wantage and Grove safeguarding for the eastern railway station option for both north and south of the railway line, and will further consider the merits of retaining the additional sites for the station. As we set out in response to comments on Policy IN2, the proposed submission plan includes details on how we are planning for, and safeguarding transport schemes, that are focused primarily on active and sustainable travel.

We are continuing to safeguard land for the mobility hub at Cumnor while Oxfordshire County Council are considering options for new mobility hubs on the approach to Oxford. The proposed policies map shows the additional recreation routes and National Cycle Network. We have made detailed changes to the policy wording and supporting in response to Oxfordshire County Council's comments.

We have not included safeguarded land for an additional Thames River Crossing, as South Oxfordshire District Council considers that such a crossing would result in significant additional highway demand on South Oxfordshire's roads. Transport safeguarding is not proposed by the councils where it is only required for vehicular access to one site and is not integral to a wider strategic transport scheme.

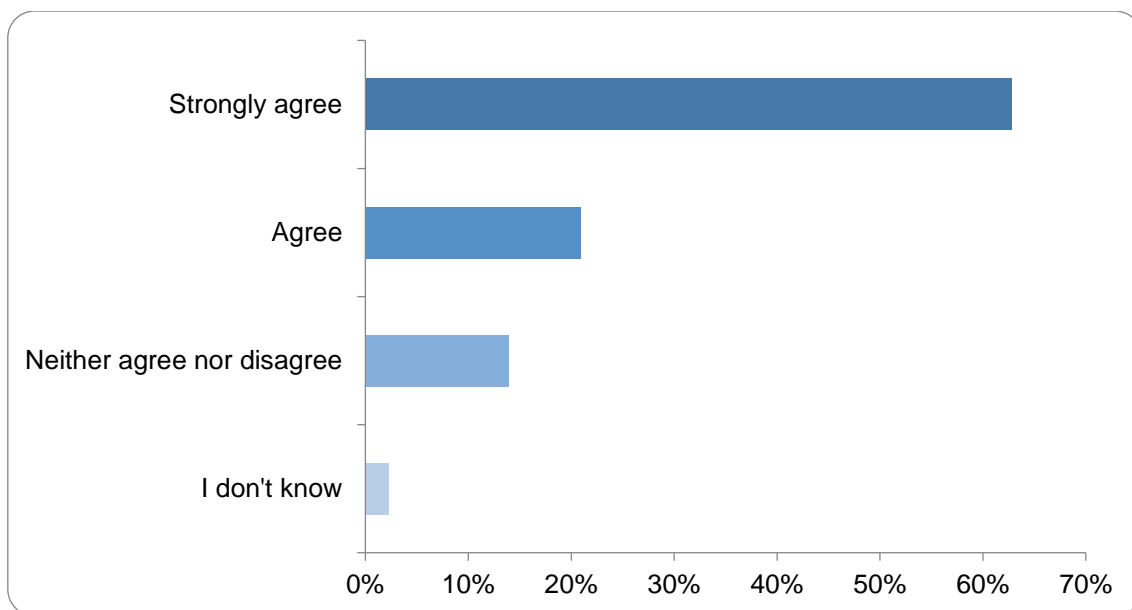
Policy IN4 – Wilts and Berks Canal safeguarding

Full Survey: Which option do you prefer?



Of the 42 people who responded to this question, 98% preferred Option A. 548 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 43 people who responded to this question, 84% either agreed or strongly agreed with the proposed draft policy wording. 547 people did not answer.

Full Survey: Summary of main issues raised

- There was overall strong support for this policy, with some emphasising the benefits for leisure.
- A respondent suggested that developers may avoid building adjacent to the safeguarded route.
- Canal infrastructure should connect with national cycle paths.

Canal and River Trust supported proposed Option A. The policy wording is comprehensive and will support the restoration of the canal as multifunctional green and blue infrastructure.

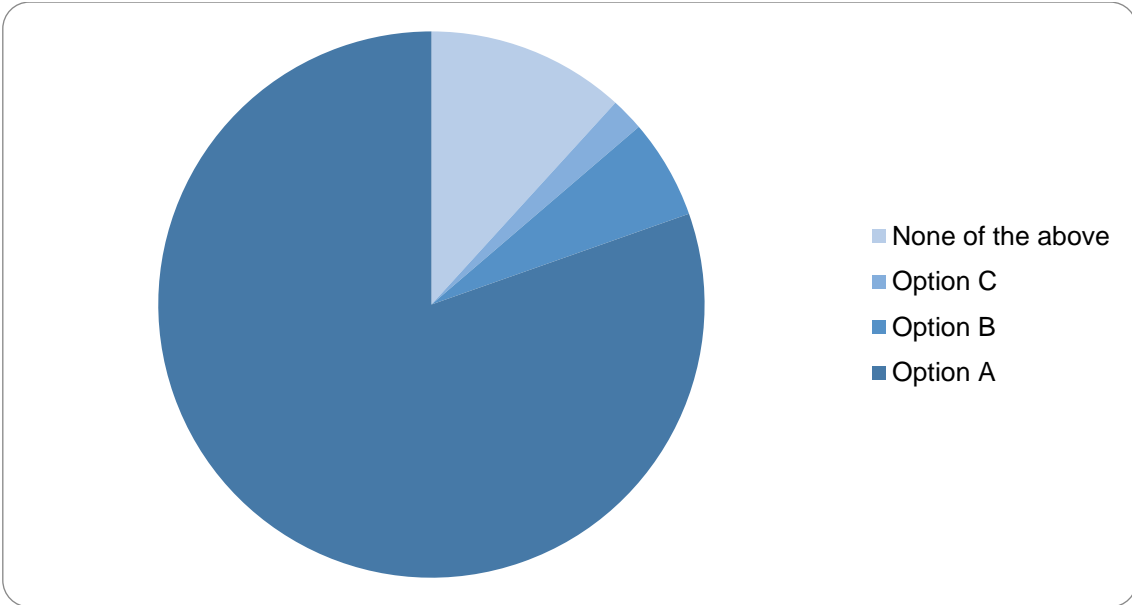
Wilts and Berks Canal Trust strongly supported this policy and have suggested adding supporting text detail around associated infrastructure may fall outside of the 30m wide safeguarding, such as a walkway across the canal or habitat creation areas.

How the main issues have been taken into account

A canal is likely to increase the value of adjacent land. As the project progresses we expect that the land adjacent to the safeguarded canal will become preferential for developers. We support placing extra emphasis to connect future active travel infrastructure and the canal tow path. The plan deals with this in the wider transport policies, and by supporting Oxfordshire County Council's Strategic Active Travel Network. We have added supporting text to the policy to acknowledge the wider requirements of the canal restoration.

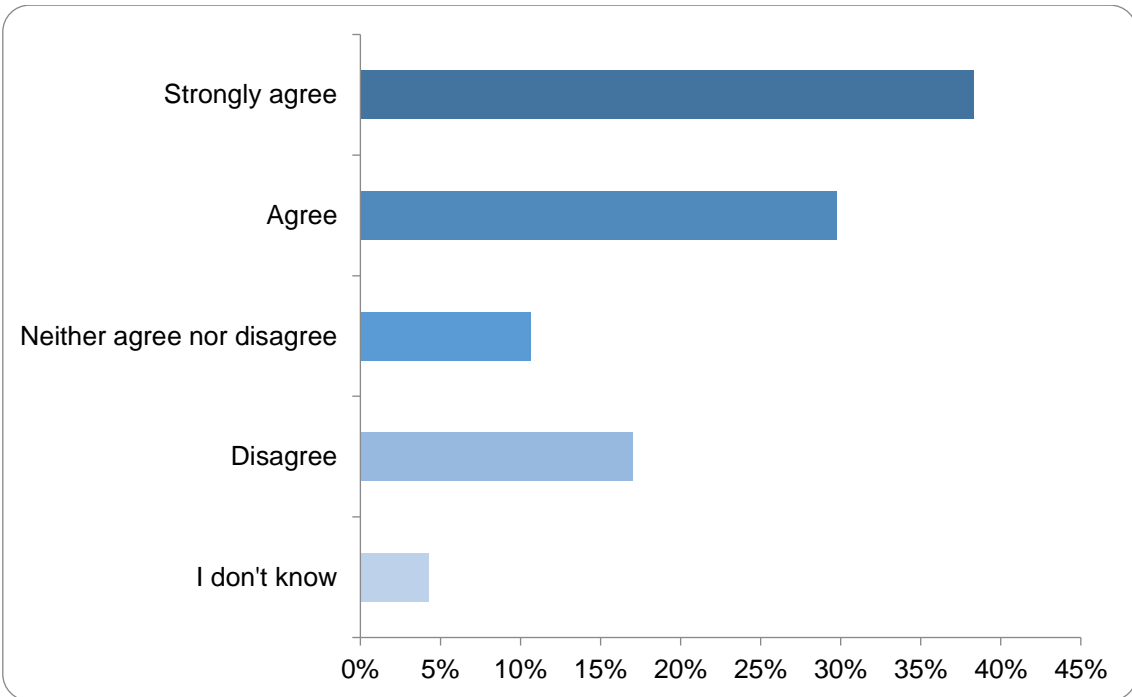
Policy IN5 – Parking standards

Full Survey: Which option do you prefer?



Of the 51 people who responded to this question, 80% preferred Option A. 539 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 47 people who responded to this question, 68% either agreed or strongly agreed with the proposed draft policy wording. 543 people did not answer.

Full Survey: Summary of main issues raised

- Respondents support this policy to achieve net zero targets.
- Some respondents indicated that reducing parking provision would cause obstructive parking.

- Respondents requested more detail regarding EV charging in the policy for cars and e-bikes.
- Smaller more regular public transport would encourage more people to use it.
- Consideration of visitor parking.

Oxford City Council supports Option A but suggest that specific reference to the residential standards for parking for Edge of Oxford City sites is also included.

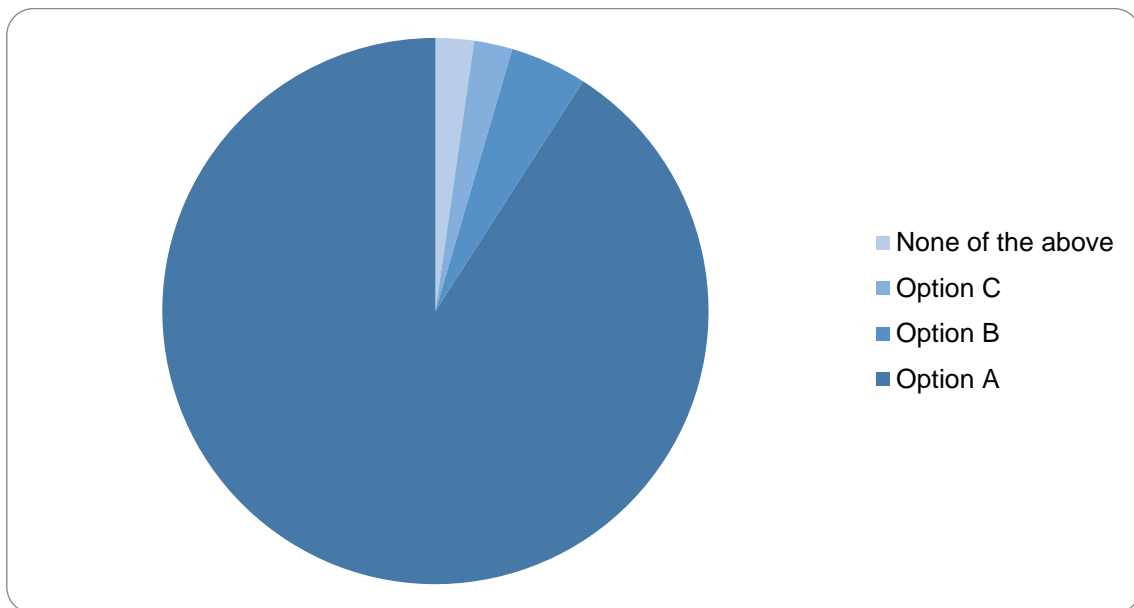
How the main issues have been taken into account

The policy already refers to visitor car parking as this is included in Oxfordshire County Council's parking standards. We have added supporting text on electric vehicles to highlight that Oxfordshire County Council's parking standards also contain standards for electric cars and e-bikes.

We have added supporting text to the site allocation policies for the edge of Oxford sites (Land south of Grenoble Road, Land at Northfield, and Land at Bayswater Brook) to clarify the additional standards for parking for edge of Oxford City sites (again, in line with Oxfordshire County Council's parking standards)

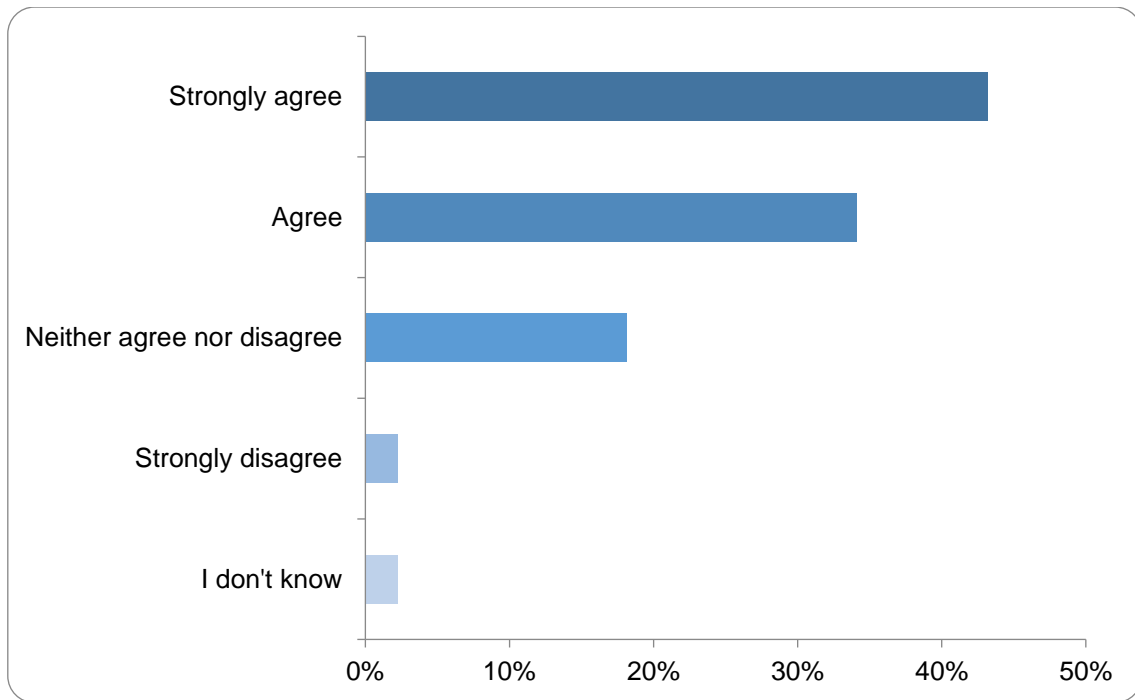
Policy IN6 – Deliveries and freight

Full Survey: Which option do you prefer?



Of the 44 people who responded to this question, 91% preferred Option A. 546 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 44 people who responded to this question, 77% either agreed or strongly agreed with the proposed draft policy wording. 546 people did not answer.

Full Survey: Summary of main issues raised

- The majority of respondents support the preferred option.
- Respondents highlight road width constraints to HGV movements.
- There were mixed views on the use of cargo bikes.
- Respondents supported the use of rail freight.
- Some respondents suggested that the policy is too urban-centric.

Oxford City Council support a policy that helps consolidate freight movements to support the LTCP and its supporting Freight and Logistics strategy.

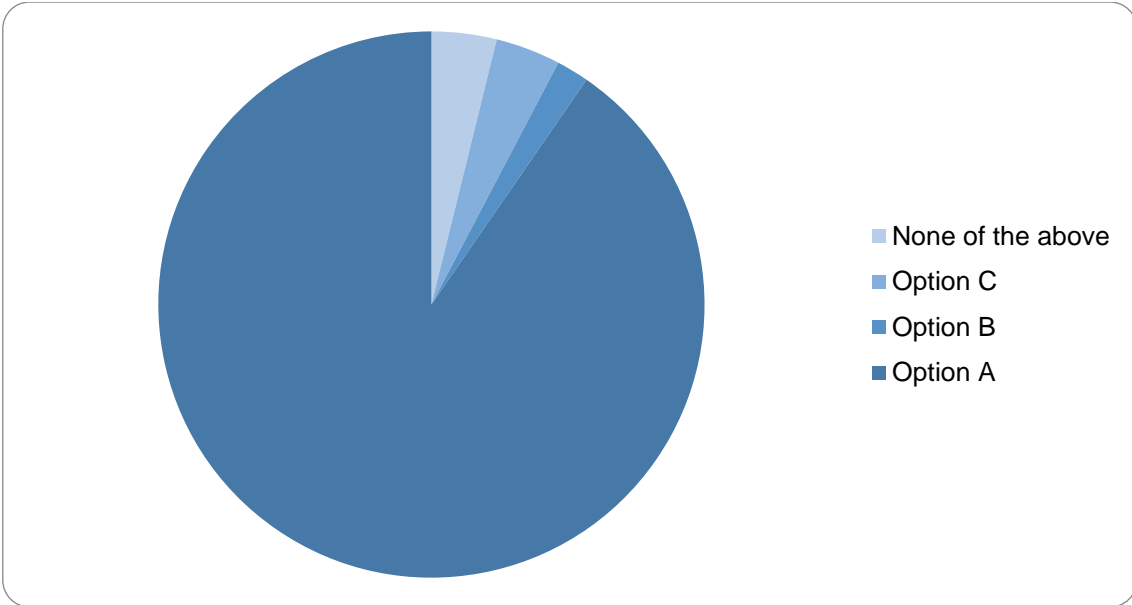
How the main issues have been taken into account

We have added reference in the supporting text to Oxfordshire County Council's [Freight and Logistics Strategy](#), which identifies suitable HGV corridors in the districts.

Local plan policies relate to planned growth locations, in accordance with the spatial strategy, growth is planned for the more urban locations in the districts.

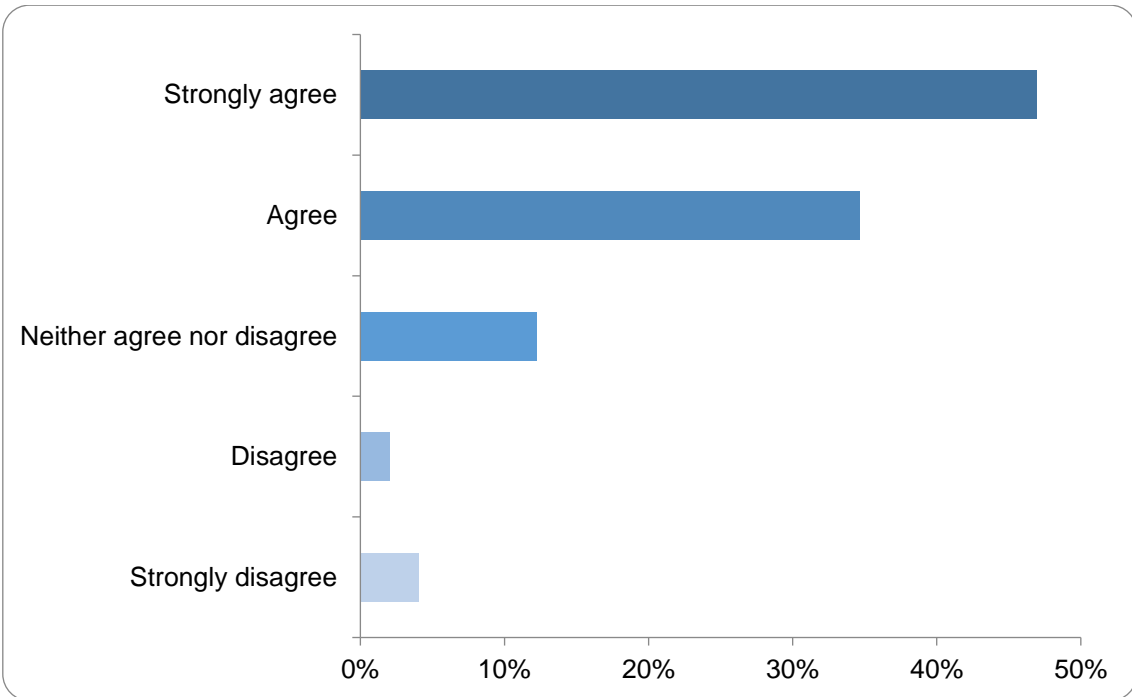
Policy IN7 – South East Strategic Reservoir Option (SESRO) safeguarding

Full Survey: Which option do you prefer?



Of the 52 people who responded to this question, 90% preferred Option A. 538 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 49 people who responded to this question, 82% either agreed or strongly agreed with the proposed draft policy wording. 541 people did not answer.

Full Survey: Summary of main issues raised

- Many environmental concerns were raised about the reservoir as follows:
 - Flood alleviation to the local area needs to be considered, with one specific request to add reference to East Hanney and Steventon

- Increased risks of groundwater flooding will need mitigating
- The policy should make references to embedded carbon
- The water stored in the reservoir should meet water quality standards
- Impact on outflows on the River Thames
- The proposal involves a 5km tunnel bored underground, a weir in the river bank and a shaft and screens to stop fish/debris. This will cause noise, vibration and damage to the surrounding environment and river Thames at Culham in both construction and operation and maintenance
- More emphasis on the integration of, and adding to, conservation and wildlife, and parts of the reservoir should be safeguarded for nature reserves.
- The policy should broaden the types of archaeological investigation methods needed prior to construction - such as geoarchaeological deposit modelling, landscape scale geochemistry, and surface artefact collection.
- Support the idea of having a policy on the reservoir, while still maintaining opposition to it. Comments encouraged Thames Water to fix leaks / complete upgrades to other sewerage infrastructure instead. Such comments often pointed to unacceptable environmental effects of developing the reservoir, and the councils should continue to oppose the reservoir throughout the DCO process.
- Other comments asked that the plan ensures routes and sites for alternative infrastructure options (such as transfer from the Severn) are safeguarded, to ensure that the reservoir doesn't become the only option because the plan dictates it's the only option safeguarded.
- Other comments stated that they understand the need for the reservoir given growth in the region.
- One site promoter advised that allocating land for development to the south of Abingdon would support the Council's approach of maintaining control of the reservoir land. Other site promoters in East Hanney (land north of East Hanney and land at Steventon Road, East Hanney) advised that their sites can still deliver residential development and act as a buffer / transition between the village and the reservoir.
- One comment expressed concerns the cumulative impact of SESRO and the allocations of Land adjacent to Culham Science Centre and Dalton Barracks would overwhelm Abingdon's infrastructure.
- The policy should require the reservoir to provide sustainable energy generation such as hydro battery storage, hydro power, and floating solar arrays.
- The policy should state that the new route for the diverted Hanney to Steventon road be a multi-user path (including equestrians) and should provide links to the surrounding bridleway network.

Thames Water, Affinity Water and Southern Water – Supported preferred Option A, however they raised concerns and objections to the various requirements of draft Policy IN7. They also requested an additional strategic policy referencing the

national water resource planning process and the links between SESRO and other Strategic Reservoir Options.

Sport England supported the policy, but said that if the reservoir is used for watersports, the policy will need to include provision of boat house(s) and storage facilities. Slipways would need to be designed for watercraft, and no wind turbines should be allowed within the vicinity of the reservoir (as they affect sailing crafts). Access for disabled users will need to be carefully considered.

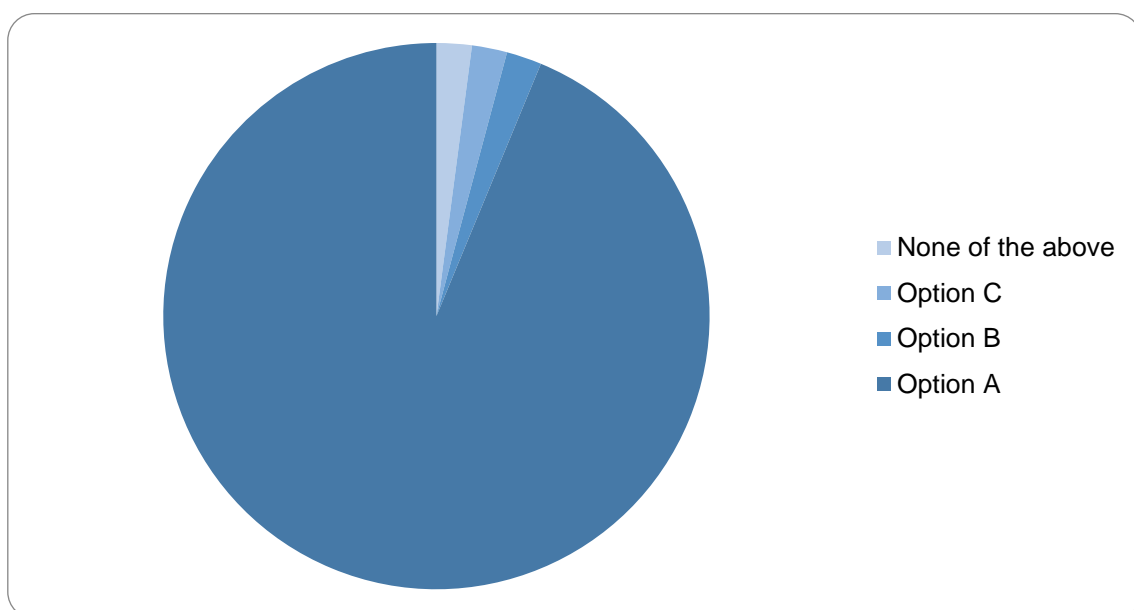
Wilts and Berks Canal Trust strongly supported Part 5(j) which requires the construction of the replacement section of Wilts and Berks Canal if the reservoir goes ahead. The Trust doesn't have a view as to whether the reservoir should go ahead, but are concerned that the reservoir threatens how and when this part of the canal can be restored. The Trust pointed out that they have been working with Thames Water however to identify a new, alternative route to the west of the proposed reservoir.

How the main issues have been taken into account

Many of the concerns raised are already addressed by specific criterion within the policy, so did not require further changes. However, we have introduced new text to require the diverted Hanney to Steventon Road to make provision for multiple users (Part (h)). We have also introduced a new Part (r) to require measures to ensure the reservoir meets water quality standards, and Part (x) to ensure that recreation uses are accessible for disabled users. We could not safeguard land for additional / alternative water infrastructure proposals (such as the river transfer) as the location of such improvements is not known and could result in large swathes of the districts being safeguarded.

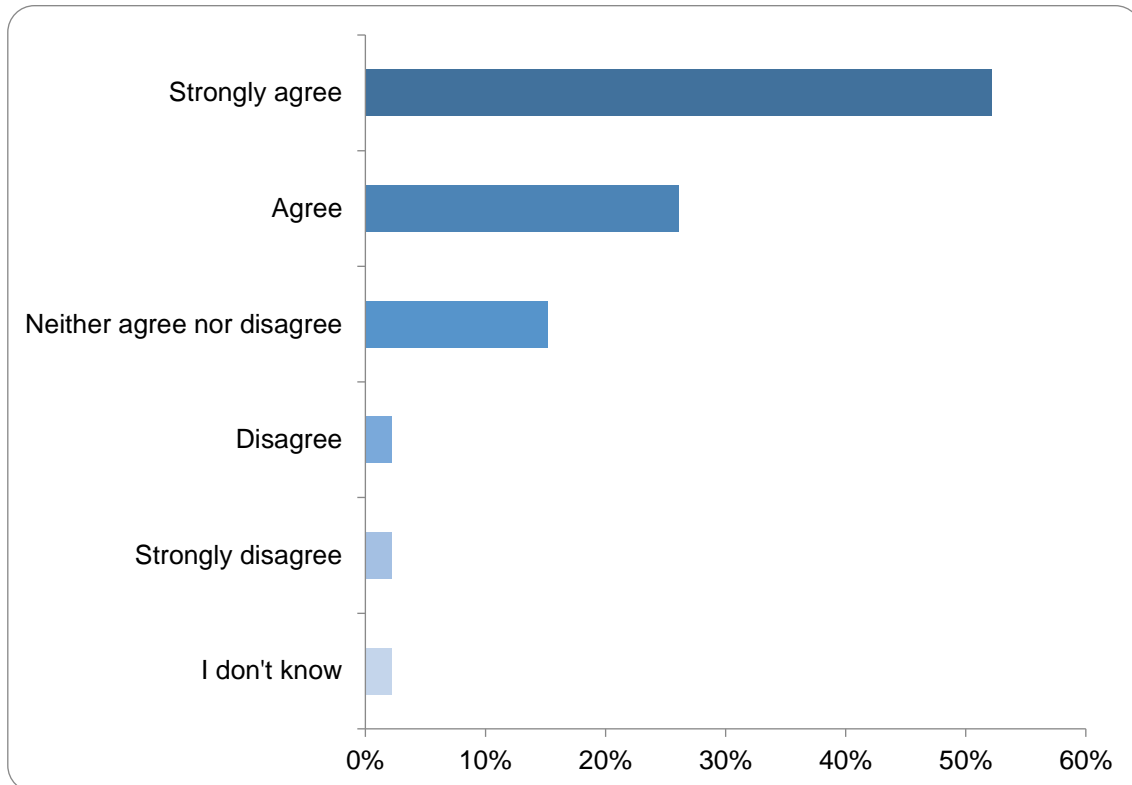
Policy IN8 – Digital connectivity

Full Survey: Which option do you prefer?



Of the 48 people who responded to this question, 94% preferred Option A. 542 people did not answer.

Full Survey: How far do you agree or disagree with the proposed draft policy wording?



Of the 46 people who responded to this question, 78% either agreed or strongly agreed with the proposed draft policy wording. 544 people did not answer.

Full Survey: Summary of main issues raised

- There was support for the commitment to excellent digital connectivity and that it should be a high priority given the rural nature of the districts and the shift to working from home. It is suggested that local authorities should help finance its roll out in our districts.
- Some comments supported developments (both residential and employment) needing to provide digital infrastructure, however one comment suggested it is unrealistic for a developer to deliver or finance full fibre broadband or boost mobile connectivity to a rural community, and that this requirement would not meet the tests for a planning obligation.
- There were suggestions that the policy goes further in addressing the visual and heritage impacts of digital infrastructure, including more requirements for underground ducting and cables, and sharing existing poles/pylons. Comments stated we would need to work with Oxfordshire County Council to deliver this ambition.
- Comments acknowledged the importance of digital connectivity for disabled people to reduce social isolation and enable home working

- Some raised concerns that there is a disconnect between providers and current requirements and that there is a need for better long-term strategies with providers
- Respondents suggested that all communities and households should have reliable 5G signal and full fibre by 2027. No further masts should be approved until this has been committed by network providers.
- One comment supported the creation of new data centres to complement this policy as they provide the necessary infrastructure for processing, storing, and managing the vast amounts of data generated by 5G-connected devices and applications.

Oxfordshire County Council supported the policy, and welcomes the reference to the Digital Infrastructure Strategy in the supporting text. They also encourage provision to be future-proofed not only for 5G connectivity but later generations of mobile data connectivity.

How the main issues have been taken into account

We acknowledge the support for the policy and the importance of digital connectivity. Other policies in the Joint Local Plan will consider the impact of equipment, including on listed buildings and landscape/visual impact. We agree that collaboration with the county council is important in relation to street design and ducting. Oxfordshire County Council is also leading on the Digital Infrastructure Programme for Oxfordshire and our proposed policy aims to support this digital rollout using the tools we can as the local planning authority. We have amended the policy to require applications to consider future proofing for developments in communications technology.

Other general comments regarding Chapter 13: Infrastructure, transport, connectivity and communications

Full Survey: Summary of main issues raised

- One respondent questioned what evidence has been used for relating to highways and transport matters.
- One respondent noted that there is little reference to rail through the Joint Local Plan, and suggested the rail network in Oxfordshire should be highlighted as more important.
- One respondent suggested that the support for the HIF1 scheme in the Joint Local Plan is in conflict with the aim of encouraging active travel and public transport.
- One respondent questioned how the Joint Local Plan policies will form a transport solution to achieve the Local Transport and Connectivity Plan's (LTCP) vision.

Oxfordshire County Council said that there is work ongoing to model transport scenarios and prepare the necessary transport evidence to support the Regulation 19 version of the Joint Local Plan. Consultant work is being prepared jointly for the county and the district councils. The county council also said that informal officer

work on the preparation of the IDP is likely to start in March 2024 and that relevant County officers will be involved in this work as it continues. They confirmed that the IDP is a key document and that they will work positively and collaboratively with the aim of addressing the important infrastructure needs in the districts.

How the main issues have been taken into account

Transport modelling evidence has been undertaken as part of the plan's preparation in collaboration with Oxfordshire County Council throughout the Regulation 18 period. Improvements to the rail network in Oxfordshire is largely outside of the scope of the Joint Local Plan. Reference to rail has been made where relevant.

The councils continue to support HIF1. The HIF1 schemes play a fundamental role for the functionality of the bus network and operation while also developing the active travel network through provision of high quality walking and cycle connections between a number of key locations in the Science Vale area.

Policy IN2 (Sustainable transport and accessibility) requires applicants to be consistent with the guiding principles of the LTCP.

Local Plan Explainer

General comments regarding Chapter 15: Local Plan Explainer

Full Survey: Summary of main issues raised

Oxfordshire County Council noticed a reference to the Oxfordshire Plan 2050 on page 536 and suggested that this is removed, because, as recognised on page 537, work on this plan has ceased.

How the main issues have been taken into account

The reference to the Oxfordshire Plan 2050 has been removed.

Other Comments

Nutshell (Section 15): Is there anything else you would like to tell us?

198 people answered this question.

Respondents reiterated a number of issues raised in response to earlier questions, including the need to consider flooding, improve the road and travel network(s), reconsider settlement hierarchies, provide more affordable homes and prioritise upfront infrastructure delivery to address existing capacity issues. Specific matters were raised in relation to areas (for instance, settlements and roads) in the districts. There was support for the proposed approach to housing numbers, responding to climate change, protecting the landscape and enhancing biodiversity – with some respondents feeling more could be done to address these priorities. Some respondents expressed support for the plan and the work undertaken to date, whilst others expressed their objections to the plan and challenges with completing the survey. Respondents wanted to know that their responses would be taken in to account.

Nutshell (Section 15): Is there anything else you would like to see in the Joint Local Plan that hasn't been covered already?

85 people answered this question.

Respondents raised again the need for better infrastructure provision, including improved road networks, cycling infrastructure and other active travel networks. Some respondents felt that there should be more of a focus on revitalising town centres and addressing flooding concerns. Objection was raised about the South East Strategic Reservoir Option. Some respondents thought the plan should consider wildlife corridors, and improved biodiversity, and give more weight to the climate crisis. Other matters were raised including renewable energy, transport, waterways, types and tenures of new homes, density and scale of development and provision of community infrastructure. Some respondents commented on the approach to consultation and scope (area and strategy) of the Joint Local Plan itself.

Full Survey: is there anything else you would like to see in the Joint Local Plan that hasn't been covered already?

Full Survey: Summary of main issues raised

The main issues raised for this question addressed the Joint Local Plan document itself, as well as housing and development.

- There were a mix of comments regarding the JLP and its consultation/documentation: some respondents were supportive, feeling the presented materials were very comprehensive; others felt the JLP document and supporting website were too long and/or required further editing (e.g. to complete policies and remove any vagueness). Some comments highlighted a preference for alternative approaches (including reordering the document;

moving the strategy to earlier in the document; disregarding the government's direction and changing the plan period).

- A number of comments mentioned the consultation approach – some felt they needed a longer consultation period in which to respond to the extensive documentation and some felt that the survey was too complicated.
- There were a mix of comments regarding housing adjacent to Oxford City's boundary – some were supportive of Oxford-adjacent development or taking on Oxford City's unmet need; others did not want the districts to take on any unmet need.
- Housing was commented on frequently, with mixed responses. Many alternative sites were promoted; and site promoters often made comments highlighting that the districts required more housing, or that alternative approaches to the standard method or site selection process should be utilised. A number of respondents raised concerns with the impact of current or planned housing development sites (for example, disagreeing with their location). Some suggested alternative delivery approaches, such as adding small/medium site allocations. Others raised a need for more affordable housing/mobile home sites, for example. There was a comment that developers should declare their profit margins to the councils.
- There was a mixed response regarding the Green Belt – some wanted further protection for Green Belt land, whilst others suggested more land should either be released from the Green Belt, or that land should be released in different places than currently planned.
- There was a query about why there was no supporting evidence in relation to highways and transport matters and no confirmation as to whether transport modelling work has been undertaken.
- It was highlighted that mental health is only mentioned once in the document (in relation to open spaces), though town planning has a big impact on mental health.
- There was a concern that there was an omission of a policy regarding support for building residential conversions – such as Vale's Policy DP7 (Re-use, Conversion and Extension of Buildings for Dwellings in the Open Countryside); and concern with explanations for DP7's removal.
- Several respondents raised issues with the district and county councils and/or their services more generally, such as issues related to road quality, distributing spend fairly and political decisions.

How the main issues have been taken into account

The Joint Local Plan Regulation 18 Part 2 Preferred Options document provided draft policies, as well as numerous alternative options, for each policy. This resulted in a lengthier document; for Regulation 19 (the Local Plan publication stage) the options have been removed and therefore the overall document length has significantly shortened. The Regulation 18 Part 2 Preferred Options document was presented alongside an 'In a Nutshell' survey as well as a full consultation questionnaire. This allowed readers the choice between reading and commenting on the highlights and headlines of the emerging plan, which utilised active language and

plain English (the 'In a Nutshell' survey) and a more conventional structured survey that asked the reader about each policy (the full consultation questionnaire). The consultations ran from 10 January to 26 February 2024 – this period was longer than the requirements set out in the planning regulations.

The Joint Local Plan covers the period from 2021 to 2041, which is 15 years and meets the requirements of the NPPF.

The councils note the comments highlighted regarding housing and the spatial strategy. The spatial strategy adequately reflects the justified housing and employment requirements. Please see the councils' Consultation Statement response to policies HOU1 and HOU2, regarding comments relating to the housing requirement and unmet housing need. South Oxfordshire's Local Plan 2035 and Vale of White Horse's Local Plan Part 2 agreed to accommodate existing agreed unmet housing need from Oxford City Council's Local Plan 2036. The Joint Local Plan continues to make provision for this unmet housing need, with an additional 4,950 homes for South Oxfordshire, and 1,830 homes for the Vale of White Horse. The three site allocations at the edge of Oxford promote a sustainable form of development and also help to address the agreed unmet housing need.

The councils note the comments regarding a need for more affordable housing in the districts. Our approach to the level and tenure mix of affordable housing is to address the needs of as many households identified through the Joint Housing Need Assessment 2024, as reasonably possible.

Regarding Green Belt land, Policy SP1 (Spatial Strategy) highlights that the councils will maintain the openness of the Oxford Green Belt. Development proposals in the Green Belt will be considered in accordance with the National Planning Policy Framework. Development on Green Belt land will be restricted to ensure it continues to fulfil the five purposes of the Green Belt. Substantial weight will be given to any harm to the Green Belt when assessing planning applications.

Transport modelling has been undertaken for the Joint Local Plan and this information/evidence is published during the Regulation 19 publicity period.

Mental wellbeing/mental health in relation to planning is addressed in the supporting text of Policy HP1 (Healthy Place Shaping).

Vale of White Horse Local Plan Part 2's Policy DP7 (Re-use, Conversion and Extension of Buildings for Dwellings in the Open Countryside) is now sufficiently covered by permitted development rights.

This Consultation Statement focuses on the comments and issues raised regarding the Joint Local Plan Regulation 18 Part 2 Issues and Options document. To raise issues and queries that are not Joint Local Plan or Planning Policy related, please contact South Oxfordshire and Vale of White Horse District Councils on 01235 422422 or enquire via our websites:

- <https://www.southoxon.gov.uk/south-oxfordshire-district-council/about-the-council/get-in-touch/contact-us/> or

- <https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/get-in-touch/contact-us/>

and we will direct you to the appropriate department who will be happy to answer any questions.

Oxfordshire County Council Highways Team can be contacted about road quality issues via their website - <https://www.oxfordshire.gov.uk/contactus/contact-highways-team#no-back> or on 0345 3101111.

Nutshell (Section 15): Is there anything else you would like to see in the Joint Local Plan that hasn't been covered already?

Full Survey: Summary of main issues raised

The main issues raised in response to this question focused on housing/development as well as the Joint Local Plan document itself, along with its supporting documentation and consultation/process.

Housing/Development:

- A number of comments stated that more housing was required; and many of these respondents also stated that the planned housing would not support the jobs/economic growth anticipated or that housing/employment strategies needed further alignment. Many respondents raising these points also supported Oxford City's emerging unmet need requirements. Some perceived that there is a lack of growth, querying whether the plan was capable of meeting the economic and housing needs into the future. There was a suggestion that using Neighbourhood Plans to manage growth at a local level is unlikely to secure the strategic infrastructure that a plan requires.
- Conversely, a number of respondents raised concerns with current housing/development plans, highlighting specific issues such as - a need for infrastructure improvements/expansion, halting plans until outcomes of HIF1 and SESRO were decided, suggestions of ideas surrounding housing design, and requests to focus on small/medium sites and smaller-sized affordable housing developments.
- A number of respondents requested for more community facilities to be planned (for example, shops and health provision).
- Many alternative sites were promoted.

Preferred Options Documentation:

- The Joint Local Plan Regulation 18 Preferred Options document, along with its supporting documentation, had many comments, as well as the consultation itself. These were mixed, with some respondents supporting the documentation, stating it was very comprehensive, supporting the direction of approach and new policy areas. Some felt some statements were too vague or 'high-level' and queried how achievements and monitoring of proposals would be carried out. Some queried the evidence base, saying that more understanding of housing, health and economic need was required. Some

expressed that the JLP document was too long - several policies being particularly lengthy and some covered national policy requirements/building regulations and recommended refining these, ensuring clarity and avoiding ambiguity. They also advised awareness of the proposed introduction of National Development Management Policies (NDMPs). There was a question whether the other options in the plan were 'reasonable alternatives'.

- Some respondents queried the plan period and suggested it should be extended as the timetables were extremely optimistic. Some highlighted governmental deadlines for the submission of Local Plans in 2025.

Survey / Consultation Events / Engagement:

- Some said that the survey was too long or that people would not have the time to complete it. There was a suggestion that the contact email address should be better advertised/readily available.
- Issues were raised with the Abingdon 'Pablo Lounge' consultation event, in terms of its space, lack of exhibition boards and lack of paper copies of surveys. There was a comment that strategic site neighbouring parishes should have a copy of the plan, not just the local library and council office foyer.
- Some comments suggested there should have been more active engagement with key stakeholders in the plan making process, such as business parks, investors and developers in the science and technology sectors. There was a suggestion for more cross-county collaboration and joint working in the county overall, to maintain Oxfordshire's economic dynamism; points that transport networks require investment to manage the impact of planned growth; regret that the Oxfordshire Plan 2050 had ended; and a call for the review of the role and functioning of the Future Oxfordshire Partnership, including how to secure effective input from the business sector of Oxfordshire.
- There was a request for the SCI to be expanded.

Other Comments:

- that nature recovery should be prioritised above other policies.
- Querying what is happening to the derelict site at Upper Reaches Abingdon, as it was an eyesore.
- CIL and Monitoring - a respondent asked for a review of the CIL as small scale schemes were discriminated against.

Oxfordshire County Council suggested that the monitoring reports should clearly identify the completions for Oxford's unmet need each year, and identify how the affordable housing component was addressed. They said that would expect that the affordable housing component of the numbers being identified for Oxford's unmet need is clearly documented. An updated list of OCC online guidance resources were provided for the JLP to reference.

Homes England stated that the JLP should at this stage be afforded very limited weight in determining planning applications due to the stage of preparation, and the

extent to which there are unresolved objections to relevant policies and the degree of consistency with the Framework (ref NPPF para 48).

How the main issues have been taken into account

As many of the comments related to specific policy/aims, these have been addressed in the individual policy summaries. The Joint Local Plan will clearly state how monitoring of the performance of the plan will be carried out – this is essential to assess effectiveness and to record whether proposals and policies are being implemented and delivered.

The councils note the comments highlighted regarding housing and the spatial strategy. The spatial strategy adequately reflects the justified housing and employment requirements. Please see the councils' Consultation Statement response to policies HOU1 and HOU2, regarding comments relating to the housing requirement and unmet housing need. South Oxfordshire's Local Plan 2035 and Vale of White Horse's Local Plan Part 2 agreed to accommodate existing agreed unmet housing need from Oxford City Council's Local Plan 2036. The Joint Local Plan continues to make provision for this unmet housing need, with an additional 4,950 homes for South Oxfordshire, and 1,830 homes for the Vale of White Horse. The three site allocations at the edge of Oxford promote a sustainable form of development and also help to address the agreed unmet housing need.

The councils note the comments regarding a need for more affordable housing in the districts. Our approach to the level and tenure mix of affordable housing is to address the needs of as many households identified through the Joint Housing Need Assessment 2024, as reasonably possible.

The councils have prepared a Site Selection Topic Paper, which provides further detail on how we have approached the assessment and subsequent allocation of sites in the plan to meet identified housing and employment needs in South Oxfordshire and Vale of White Horse.

The Joint Local Plan Regulation 18 Part 2 Issues and Options document provided draft policies, as well as numerous alternative options, for each policy. This resulted in a lengthier document; for Regulation 19 (the Local Plan publication stage) the options have been removed and therefore the overall document length has significantly shortened. The Regulation 18 Part 2 Issues and Options document was presented alongside an 'Joint Local Plan in a Nutshell' survey, as well as a full consultation questionnaire. This allowed readers the choice between reading and commenting on the highlights and headlines of the emerging plan, which utilised active language and plain English (the 'In a Nutshell' survey) and a more conventional structured survey that asked the reader about each policy (the full consultation questionnaire).

The consultation ran from 10 January to 26 February 2024 – this period was longer than the requirements set out in the planning regulations. The councils take note of the comments about the consultation and consultation events – we believe a full and extensive consultation on the Joint Local Plan Regulation 18 Part 2 document took place. We ran ten separate consultation events across the districts, using a variety of

venues, including some which offered space to the council at no cost to the taxpayer, in town-centre locations where the councils felt they could raise the most awareness and discussion about the Joint Local Plan. Please see Section 1: Engagement Methods of this consultation statement which provides extensive detail about the wide variety of consultation events and engagement the councils organised (including events, extensive email, website and social media coverage and visits to schools) to ensure a full and extensive consultation.

The Joint Local Plan covers the period from 2021 to 2041, which is 15 years and meets the requirements of the NPPF.

Transport modelling has been undertaken for the Joint Local Plan and this information/evidence is published with the Regulation 19 publication documents.

Nature recovery is a high priority for the councils, as demonstrated in our vision and objectives of the Joint Local Plan, with a key objective to help nature recover by protecting wildlife and expanding natural habitats, requiring developments to achieve the highest viable net gain in biodiversity so that it leaves the natural environment better than it was before the development. This is one objective of twelve - all need to be carefully balanced in order to underpin the strategy of our plan and its policies.

Regarding the Upper Reaches in Abingdon, Vale of White Horse District Council, as landowner, is doing all it can to encourage the long leaseholder (who is responsible for the Upper Reaches site) to explore what can be done to bring the site back into use. The councils are really keen to see some further progress for what should be a huge asset to the town.

With regard to CIL and monitoring, the Joint Local Plan is not an examination of our CIL rates; and the Joint Local Plan has been viability tested. Housing need from neighbouring authorities does not represent a distinct element of our housing need or supply, so cannot be monitored in the way suggested.

Planning Practice Guidance and the National Planning Policy Framework set out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF.

This Consultation Statement focuses on the comments and issues raised regarding the Joint Local Plan Regulation 18 Part 2 Issues and Options document. To raise issues and queries that are not Joint Local Plan or Planning Policy related, please contact South Oxfordshire and Vale of White Horse District Councils on 01235 422422 or enquire via our websites:

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- <https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/get-in-touch/contact-us/>

and we will direct you to the appropriate department who will be happy to answer any questions.

Supporting Documents

General comments regarding supporting documents

Full Survey: Summary of main issues raised

- Some respondents noted that there were gaps in the supporting evidence available during the Preferred Options Consultation, where some reports which were mentioned within policies had not yet been made available.
- Some respondents suggested that without these evidence base documents, it was unclear how the plan could be robust.
- Other respondents made specific comments about individual supporting evidence documents, which have been recorded under the relevant sub-headings below.

How the main issues have been taken into account

We have published our evidence base documents alongside the Publication Version of the Joint Local Plan. These have been taken into account in updates made to the policies and plan content as the plan-making process has proceeded.

Sustainability Appraisal (SA)

Full Survey: Summary of main issues raised

A number of comments were made about the Sustainability Appraisal (SA), which accompanied the Preferred Options JLP. These included:

- Suggested revisions to the sustainability objectives used in the SA framework.
- Requests for additional 'reasonable alternative' sites and spatial options to be tested.
- Comments about how the SA has been considered in the plan-making process.
- Detailed comments about the information presented in the SA appendices covering individual JLP sites and policies.

How the main issues have been taken into account

All comments have been considered and, where appropriate, amendments have been made to SA report. The schedule at Appendix B of the SA comprises a summary of all comments received on the SA at each stage of plan preparation, with the councils' response alongside. The latest iteration of the Sustainability Appraisal report and appendices will be published alongside the Publication Version of the Joint Local Plan.

Habitat Regulations Assessment (HRA)

Full Survey: Summary of main issues raised

Natural England made comments regarding the assessment of potential air quality impacts from planned development in South Oxfordshire and Vale of White Horse and our adjoining Oxfordshire authorities on the Oxford Meadows Special Area of

Conservation (SAC). They also provided advice regarding nutrient neutrality for the River Lambourn SAC.

How the main issues have been taken into account

These comments have been considered and we are working with our neighbouring Oxfordshire authorities to take a more strategic, collective approach to the assessment of air quality impacts on the Oxford Meadows SAC.

A full schedule of all comments received on the HRA at every stage of plan preparation (together with the councils' response to each individual comment) will accompany the Habitats Regulations Assessment – Appropriate Assessment, which itself will be published alongside the Submission Version of the Joint Local Plan.

Emerging Policies Map

Full Survey: Summary of main issues raised

- A number of respondents suggested specific changes to the Policies Map to add, remove or amend certain aspects.
- Some respondents asked for clearer instructions on how to use the interactive map.

How the main issues have been taken into account

We have reviewed the layers of the Policies Map to ensure that all of the required attributes were shown accurately. We also updated the Policies Map to account for changes to policies, and findings from new evidence, including creating an additional Policies Map layer to show information of wider interest, such as dark skies. We reviewed the 'User Guide' for the Policies Map and provided further information to help show how to use the interactive map.

Interim Duty to Cooperate (DTC) Statement

Full Survey: Summary of main issues raised

- Some respondents stated that the Duty to Cooperate Statement suggests one plan should resolve a strategic issue, or that one authority is to blame for lack of engagement with Oxford City, and this is not a positive or constructive approach to the duty to cooperate. They state that a failure to work with neighbouring authorities on a strategic issue is a failure to maximise the effectiveness of local plan preparation as required by section 33A of the Planning and Compulsory Purchase Act. It is suggested the Council fails to constructively engage on strategic matters, mainly the unmet housing needs of Oxford
- There was concern raised that South Oxfordshire and Vale of White Horse District Councils strongly contest the basis for Oxford's increased unmet need for multiple reasons including a lack of constructive, active, and ongoing engagement under Oxford City Council's own Duty to Cooperate
- It is suggested generally that there is a lack of constructive, active and ongoing engagement and that the duty to cooperate had not been met

- A comment suggested that the statement should be clear on what the current position is regarding unmet need for employment land from West Berkshire
- It was suggested that the statement needs to include evidence of any agreements made (e.g. via minutes of meetings or outcomes). Documentary evidence of meetings should be updated, made available and published regularly
- It was suggested that there should joint statements presented to show discussions have been undertaken with neighbouring authorities
- It was suggested that more detailed engagement should already have been undertaken to inform Preferred Options. In some cases, documented discussions were too premature to help inform or contribute to the JLP
- It was stated that for Oxfordshire, economic growth and the housing required to support that growth is a strategic matter which requires positive joint working to address.

Oxfordshire County Council said that the Oxfordshire Strategic Vision referred to in paragraph 1.6 has been agreed by six Oxfordshire Councils, therefore, they suggested that this paragraph requires amendment to include reference to Oxfordshire County Council. They highlighted that the second ‘council’ that appears in Paragraph 1.13 page 6 should be removed. They also highlighted that Paragraph 2.19 refers to the Oxfordshire Infrastructure Strategy (OXIS) and that this wording is not accurate, suggesting a number of amendments to this wording.

How the main issues have been taken into account

Some requests for clarity have been acknowledged, and since Oxford City Local Plan 2040 is progressing through examination there are updates to report on. However, the JLP is based on adopted and evidenced positions, so factual updates can be proposed to the statement and consideration given as to how clearly present the statement in general.

Joint Housing Needs Assessment (JHNA)

Full Survey: Summary of main issues raised

- It was suggested that the number of homes planned for does not match the number of jobs planned for, resulting in in-commuting which potentially undermines the County’s ability to remain a global player and attract investment.
- Some suggested the JHNA should be updated to take into account findings of the Employment Land Needs Assessment.
- Concern was raised that the JHNA inadequately considers affordable housing needs in the districts, and underestimates it compared to the Oxfordshire SHMA and OGNA, and that an uplifted housing requirement should be set to accommodate this.
- Concern was raised about the methodology used, including using projections, which represents a more cautious view of household growth compared to more recent projections.

- The councils should have considered whether there is likely to be a greater need for housing in each district than suggested by the standard method. Consideration should be given past delivery, which has consistently been far higher within both districts than the standard method.

How the main issues have been taken into account

The Joint Housing Need Assessment 2024 provides a robust assessment of the likely housing needs of specific groups in the plan area in accordance with national policy. We don't agree that there are any exceptional circumstances to depart from the Standard Method.

We have updated the JHNA to include an assessment of the need for specialist older persons accommodation and needs for adaptable dwellings. We have also provided our consultant with the findings from the ELNA, who confirmed that they align, consequently there is no requirement for a higher dwelling target to accommodate the projected workforce.

Employment Land Needs Assessment (ELNA)

Full Survey: Summary of main issues raised

- Some respondents thought that the ELNA underestimates the level of employment need. There were a variety of reasons cited, including:
 - it has not adequately planned for significant growth arising from suppressed demand and a step-change in inward investment from identified growth sectors. Funding for science and innovation development is reliant on available sites, so an undersupply could affect the ability of the area to attract funding
 - the use of the past uptake rates to project industrial employment demand does not take account of a historical lack of suitable stock available to meet market demand
 - it does not take into account relevant market signals as required by para 31 of the NPPF. OxLEP's Strategic Economic Plan (2023) and Advanced Oxford's Oxfordshire's Innovation Engine (2023) both contain an up-to-date overview of market signals relevant to the Oxfordshire economy and should be considered as forming part of the local economic evidence base for the JLP
 - it underestimates job growth in the districts
 - it does not consider a full range of economic scenarios
 - it does not take into account the unique circumstances and needs of certain sectors, for example the size and locational requirements of logistics or the fabrication requirements of R&D, which is contrary to PPG ref 2a-031-20190722
 - it fails to take into account the logistics needs for Oxford City (as identified in the Oxford City Employment Land Review 2022), despite it being within the Functional Economic Market Area (FEMA).

- One respondent thought that the ELNA doesn't link to other areas of the JLP, emphasising that well-placed logistic sites can positively impact climate change and air quality objectives.
- Another respondent stated that the site assessment for the site of the former Esso Research Centre is inaccurate as all criteria except for accessibility have been marked as 'not relevant' including the criterion land available for development, despite it being 11ha of cleared, brownfield land promoted for employment use.
- One respondent is concerned that jobs numbers are not provided in the ELNA or Policy JT1.
- One respondent stated that Thame needs an overarching policy in the JLP to deliver the employment land allocated in the neighbourhood plan.

How the main issues have been taken into account

We don't agree with the criticism that scenarios are not being tested. The ELNA has considered a range of potential growth scenarios. This includes a labour demand scenario (based on Oxford Economics projections), a past-trends scenario and a labour supply scenario derived from labour demand accounting for population growth. This approach aligns with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) to consider a range of scenarios and provides a robust basis for planning purposes. Further critique that the ELNA underestimates need are not accepted, and it is important to be aware JT1 sets out employment supply that significantly exceeds the employment requirements allowing for churn, choice and flexibility in the local employment market.

The ELNA's purpose is as evidence to support the JLP, not to draw links between local plan policies, Oxfordshire County Council strategies or any other documents, as that is the role of the Joint Local Plan itself.

The observation made regarding the former Esso Research Centre has been noted. This site has been carried forward in this plan to ensure the site delivers an employment redevelopment suitable for its location.

Job numbers are not recorded in the ELNA or policy JT1 because employment densities can vary significantly depending upon the location and the exact type of use. For example, there may be many more people employed in an office (Use Class E(g)i) than a light industrial factory (Use Class E(g)iii) of the same size, so it is not possible to provide accurate job number estimations based on land allocations made in hectares.

Policy SP7 (A strategy for Thame) provides an individual strategy for Thame as a Tier 1 settlement and sets the policy framework for neighbourhood plans and new development proposals in the town to consider. A strategic policy like SP7 isn't needed to deliver neighbourhood plan allocations, the NDP can set the framework for those sites to be delivered adequately.

Housing and Economic Land Availability Assessment (HELAA)

Full Survey: Summary of main issues raised

- A number of landowners/agents submitted representations relating to sites already considered in the HELAA, which were under their ownership or control. Some provided updates to the site information shown in the respective proformas (site size, availability, site capacity, promoted land uses, development trajectory, etc).
- Others raised specific questions or concerns about the HELAA methodology and our conclusions for their site(s), including:
 - Potential errors in site assessments relating to Grade 1 agricultural land classifications and reliability of the ALC mapping.
 - A perceived lack of consistency in the way certain sites have been assessed in the HELAA.
 - How the HELAA needs to be more transparent and, for each site, clearly explain why it is included in the HELAA and how its suitability (and overcoming of constraints) is considered.
 - Why some sites are discounted without consideration of their contribution to the purposes of inclusion in the Green Belt.
 - A need to allocate a portfolio of residential sites (from the HELAA) to meet identified housing needs across South & Vale.
 - Why other HELAA sites (e.g. a series of smaller sites near employment or towns that could promote sustainable transport patterns) have not been allocated, given that Chalgrove has been de-allocated.
 - Lack of clarity over whether any further assessment has been/will be undertaken where the site conclusion reads: ‘...appropriate for further consideration through the Joint Local Plan.
 - Concerns regarding the Councils’ decision to simply roll forward the same spatial strategy/ allocations from the current Local Plans, without interrogating any HELAA sites to establish whether they might be ‘reasonable alternatives’.
- 7 new sites were also submitted by landowners/agents for inclusion in the HELAA.

How the main issues have been taken into account

We have made amendments to individual proformas and/or HELAA mapping, where information has been provided by the landowner that better reflects the current situation for their site(s) – e.g. in terms of site boundary, active site promotion for a particular land use etc. However, we have not altered any of the capacity estimates or development trajectories because the HELAA uses standard formulas, which do not consider site specifics. Actual capacity and development trajectories would be ascertained through more detailed site assessment, either through plan making if we needed to find any additional sites to accommodate identified residential, employment (or other land use) needs or through a planning application process.

We have also assessed 7 newly submitted sites, promoted during (and after) the JLP Preferred Options Consultation.

The most substantial change we have made to the HELAA methodology is removing Grade 1 Agricultural Land as a development constraint from Step 2 of the site

assessments. Whilst the agricultural land quality of a site is still an important consideration, the DEFRA mapping we have used to calculate the extent of ‘best and most versatile’ agricultural land covering any site is quite dated and its reliability has been challenged by some landowners/agents in certain parts of South Oxfordshire. Consequently, we have taken the decision to remove BMV agricultural land (Grade 1) as a constraint from Step 2 and we have revised the HELAA methodology report to explain that more detailed assessment of agricultural land quality would still be undertaken, but on a site-specific basis later in the site selection process, if the councils need to find more sites to allocate in the JLP.

It is important to emphasise that the HELAA does not identify sites for specific uses, nor is it the HELAA’s role to undertake detailed assessment of individual sites – this happens during the site selection process. The proformas (at Appendix C to the main report) provide a high-level summary of each site’s assessment under Steps 1 and 2. However, the HELAA report clearly explains the methodology we have used, setting out the detailed criteria against which sites were assessed for these initial steps.

Whilst the list of criteria includes whether a site lies within the Green Belt, the HELAA methodology does not require assessment of a site’s contribution to the purposes of inclusion in the Green Belt, especially since there is no case being made by the councils that there are exceptional circumstances to release any Green Belt land or change its boundaries.

Taking on board comments about the need to assess more HELAA sites as ‘reasonable alternatives’ to our site allocations, we have developed a series of site selection parameters that are broadly consistent with the high-level principles of the Joint Local Plan’s Spatial Strategy (as set out in Policy SP1) and being adjacent to a Tier 1 to 3 settlement. These parameters have been applied to all the sites within the HELAA that were identified as ‘appropriate for further consideration through the Joint Local Plan’, which has resulted in an additional 43 sites (for housing or employment uses) being tested against our Sustainability Appraisal (SA) framework.

We have also prepared a Site Selection Topic Paper, which provides further detail on how we have approached the assessment and subsequent allocation of sites in the plan to meet identified housing and employment needs in South Oxfordshire and Vale of White Horse.

Net Zero Carbon Study

Full Survey: Summary of main issues raised

- One respondent noted that the cost of meeting requirements for a semi-detached house would be in the region of 5%, which is lower than some of the costs for similar standards set out in work by the Future Homes Hub (FHH). They note that whilst the specifications and methodology used may not be directly comparable to that proposed by the Councils, as they are significantly different, they recommend that the Councils provide more detailed evidence on costs.

Oxfordshire County Council had no specific comments on the study, but very much welcomed the outputs of the work. They recommended that Figures 1 and 2 on page 10 of the study are used in the Local Plan, so that it can demonstrate its progress towards its climate change mitigation and adaptation policies. They also suggested that the plan provide links between its topic paper and the study.

How the main issues have been taken into account

The Net Zero Carbon Study costs report has now been incorporated into the whole plan viability report and we consider it to provide a robust evidence base setting out plan costs, having been established and reviewed by two leading consultants in the viability sector. We recognise that methodologies used were different in the Net Zero Carbon Study to that set out in the Future Homes Hub (FHH), and therefore this is likely the reason for discrepancy between the two in terms of costs. We are satisfied that our viability work provides a credible evidence base upon which the soundness of the plan can be assessed, and therefore we consider no further viability evidence is needed to support it.

Topic Paper: Residential Focused Site Allocations

Full Survey: Summary of main issues raised

- The site promoter of Chalgrove commented that there should be robust rationale provided to justify the spatial strategy, and that there should be a comprehensive and consistent approach to site selection, using this rationale.
- Main points the site promoters raised about the omission of the site included that alternatives to omitting the site should be comprehensively considered, the omission is contrary to the findings of the HELAA, more weight should be afforded to PDL and that rejection of this site as some parts are greenfield but other sites which are solely greenfield are supported. The impact of removing Chalgrove on the delivery of other sites needs to be assessed and consulted on.
- A developer with an interest in the Sandhills parcel of the Land North of Bayswater Brook stated that the reference to questioning of viability is not justified.

How the main issues have been taken into account

We consider the review of existing allocations to be robust and do not propose changes to the content of the plan. We have prepared a Site Selection Topic Paper which sets out the review process and the consideration of alternatives.

Topic Paper: Settlement Assessment and Hierarchy

Full Survey: Summary of main issues raised

- The majority of comments related to how the settlements scores had been calculated, with some requests for the more detailed assessment breakdown of settlement scores to be published so they could be scrutinised.
- There was some discussion of specific settlements, generally with the conclusion that the settlement has been placed in a lower tier than it should

be. Furthermore a few responses identified the services and facilities/connectivity etc of a specific settlement to support inclusion/promotion of a site for development.

- There was a brief mention that the scoring should take into account planned growth. Linked to this was a critique of the inclusion of high speed broadband, as this only covers current coverage.

How the main issues have been taken into account

The assessment was done at a point in time and considers the situation at that time, future iterations will take into account anything which has been built out in the intervening period and the hierarchy will be updated accordingly.

The settlement assessment and hierarchy topic paper has been updated to include a more detailed breakdown of the settlement scores.

Alternative formats of this publication, a summary of its contents or specific sections, are available on request.

These include large print, Braille, audio, email, easy read and alternative languages.

Please contact customer services to discuss your requirements on 01235 422422.

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