

**South Oxfordshire  
Local Plan 2011 to 2033**

**Consultation Report  
Final Publication Local Plan (1<sup>st</sup>)**

**January 2019**

## Summary

South Oxfordshire District Council is producing a new Local Plan to guide development in the district to 2034. Work on the new Local Plan commenced in 2014. There have been five rounds of formal public and stakeholder consultation to consider and refine the plan's objectives, spatial strategy and detailed policies.

This is the report of the responses to South Oxfordshire District Council's fifth round of consultation on the emerging local plan. The consultation was held between 11 October 2017 and 22 November 2017.

The areas that received the most comment were as follows:

**The Duty to Cooperate and Oxford's unmet housing needs:** Neighbouring authorities and developers noted that the Growth Board 'apportionment process' provides a framework but the council has chosen a different approach within the plan. They supported the view that the unmet needs of Oxford should be met in a manner which complements the growth of Oxford, not in accordance with the spatial strategy for South Oxfordshire. Public respondents generally considered that the needs of Oxford should be met closer to the city, ideally to the north city in consideration of the proposed strategic infrastructure investment supporting the Oxford to Cambridge Expressway.

**Housing numbers:** Mixed reactions across several related subjects. Communities and campaign groups generally considered the numbers set out in the plan to be too high in view of the government's new proposed methodology.

Developers considered the numbers to be too low taking into account the age of the SHMA. Developers continued to question how the five-year housing land supply could be achieved, and when.

**The Strategy:** Mixed responses to the principle of concentrating development within strategic sites primarily due to infrastructure and deliverability concerns. Public respondents continued to argue that development should be spread out over more smaller sites in the district.

- Berinsfield – Support for the principle of regeneration tempered with concerns regarding removal from the Green Belt.

- Chalgrove Airfield – Majority objections that consider the location remote with limited opportunities for developing access by a choice of means of transport.

- Culham – Mixed reaction sustainable location, Green Belt issues.

- Didcot Garden Town – General support for the proposed development but some concerns regarding the production of the SPD were expressed.

- Wheatley Campus – Redevelopment of the site was generally supported, but concern was expressed that the capacity should not exceed 300 dwellings in view of the infrastructure capacity of the surrounding area.

**Green Belt:** Concerns regarding the removal of any land from the Green Belt tempered with views expressed that Oxford's needs should be met within and close to Oxford.

**Infrastructure:** Public respondents noted that substantial investment in infrastructure would be required to support the development proposed at Chalgrove Airfield. At Culham and the provision of a bridge was generally supported. Respondents were concerned that specific infrastructure requirements to support the proposed growth had not been set out in policy. In particular, the need for highway infrastructure improvements needed to be addressed in a timely manner to support the developments proposed by the plan. Concern was also expressed regarding the impact of the proposed Oxford to Cambridge Expressway on the district and the Plan's disregard for the changes this would bring.

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## Introduction

In October 2017, the Council published its “Local Plan 2011 - 2033 – Final Publication Version” document. This was intended to be the fifth and final stage of consultation before the submission of the plan for examination.

Following the close of the consultation in November 2017, some aspects of the timescales for delivery of the plan changed and further changes to the plan were deemed necessary. The Council has now published a revised Publication Version of the plan which will be subject to a formal consultation, before being submitted to a government appointed inspector for examination.

The Council has previously consulted during the production of the plan:

- Issues and scope (consultation one - June 2014)
- Refined options (consultation two - February 2015)
- Preferred options (consultation three - June 2016)
- Second Preferred Options (consultation four – March 2017)
- Final Publication Version (consultation five – October 2017)

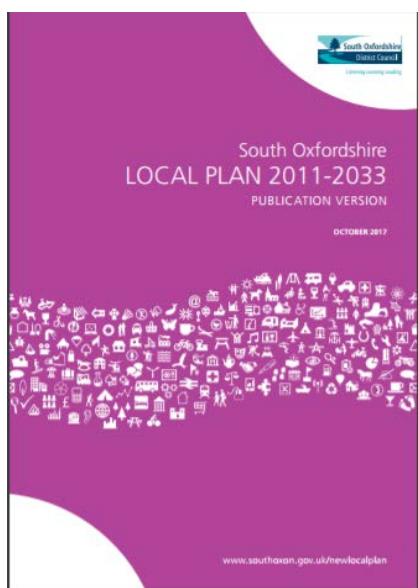
The “final publication version” of the plan was intended to be subject to examination in accordance with Regulation 19 of the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#). Accordingly, the focus of the consultation was on the “soundness” of the procedures followed in the production of the plan as set out in NPPF1 Para 182 and NPPF 2018 Para 35.

This report sets out the comments which were submitted by respondents to the consultation on the “Final Publication Version” of the local plan and highlights the changes that were made in response. The submitted comments can be viewed on the Council’s website using the following url: [http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=FolderView&ID=848264878&CODE=60A0198F91267D1A7C06F903A2DBC0D5&NAME=South%20Local%20Plan%20Consultation%20Responses&REF=SOUTH\\_LP&REFERER\\_URL\\_IN=&SOVA\\_IN=SOUTH#exactline](http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=FolderView&ID=848264878&CODE=60A0198F91267D1A7C06F903A2DBC0D5&NAME=South%20Local%20Plan%20Consultation%20Responses&REF=SOUTH_LP&REFERER_URL_IN=&SOVA_IN=SOUTH#exactline)

Officers have used the comments from the consultation to help to formulate the final version of the Local Plan. This final “Revised Publication” version of the plan will be subject to a further formal consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, focussing on the “soundness” of the plan, and will then be submitted to a government appointed inspector for examination.

This Consultation Report should be read in conjunction with the adopted ‘[Statement of Community Involvement](#)’ (2017) (SCI). The SCI sets out how the Council will consult and involve the public, businesses and statutory consultees in planning matters as well as setting out the statutory consultation requirements that the Council has to follow. The consultation has satisfied the requirements for consultation set out in the adopted SCI.

**Figure 1: Local Plan Pre-Submission Publication – Regulation 19**



Following the Second Preferred Options consultation, officers considered all the representations. As part of the consideration of these representations, extensive ongoing and informal discussions and correspondence continued with key stakeholders and other representatives of South Oxfordshire's communities. In addition, ongoing consideration was given to the relevant evidence base and studies.

Officers then prepared a 'Publication Version' of the Local Plan. This Publication version of the plan was then submitted to the following committees and sessions for debate by the elected Councillors:

<b>Table 1 – Publication Version Committees</b>		
<b>Committee</b>	<b>Date</b>	<b>Result</b>
Scrutiny	<a href="#"><u>13 September 2017</u></a>	Comments and suggested changes to the plan provided to Cabinet on the Publication version of the South Oxfordshire Local Plan and supporting documentation.
Cabinet	<a href="#"><u>21 September 2017</u></a>	Approved the Publication version of the plan under Regulation 19 as the version of the South Oxfordshire Local Plan to be submitted to the Secretary of State for independent examination
Council (special meeting)	<a href="#"><u>28 September 2017</u></a>	Approved for consultation and submission to SoS subject to the review of response received during Regulation 19 consultation

## How the Consultation was carried out

The consultation undertaken during the representation period has met the requirements for consultation as set out in the Council's adopted 'Statement of Community Involvement' (SCI). The Council exceeded the statutory consultation requirements for this stage of consultation. All the bodies and persons set out in the regulations were consulted. Officers have also consulted all those people who expressed a wish for their contact details to be placed on the Council's Local Plan consultation database.

Notification of the representation period was sent to 7512 bodies and individuals on the Council's database by post or email.

The notification set out how copies of the relevant documentation, submission forms and guidance notes could be accessed, how to submit representations, and deadlines for submission. A copy of the letter text and Regulation 19 Statement of Representations Procedure Notice sent to consultees is provided at Appendix 2.

The consultation methods used are set out in Table 2. The dates of the public exhibitions held are set out in Table 3.

<b><i>Table 2 - South Local Plan - Regulation 19 publicity period, headline programme</i></b>	
<b>Date (2017)</b>	<b>Communications or engagement activity</b>
w/c 4 September	<a href="#">Press release</a> providing update on Local Plan Website update to advertise key committee dates
w/c 11 September	Invitation issued to all parish councils / neighbourhood planning groups to briefing
w/c 25 September	Press release / social media re Full Council outcome / advertise consultation launch date
w/c 2 October	Email / letter issued to all consultees providing bulletins on the Local Plan consultation (including event dates) Social media update Interim update to website South and Vale News issued providing update on consultation dates Email issued to parish councils re use of South and Vale article in local newsletters to help advertise events and consultation
11 October	Consultation launch date Consultation system / website live including consultation factsheet and video Email reminder to all consultees, including links to factsheet and video

	<a href="#">Press release</a> issued Material available at distribution points in district Parish Council and Neighbourhood Planning Group briefing Posters provided to all parish councils to help advertise drop in events
11 October – 22 November	Regular social media updates throughout consultation and prior to each drop-in event Public drop-in events throughout the consultation period across South Oxfordshire in: Berinsfield, Chalgrove, Culham, Didcot, Henley-on-Thames, Thame, Wallingford and Wheatley Stakeholder group engagement

<b>Table 3 – Regulation 19 Public Exhibitions</b>		
<b>Exhibition Location</b>	<b>Date</b>	<b>Total Attendees</b>
<b>Wallingford</b> , St Marys Church	Saturday 14 October, 10am – 2pm	139
<b>Culham</b> , Primary School	Thursday 19 October, 4pm – 8pm	62
<b>Henley</b> , Town Council Chamber	Saturday 21 October, 10am – 2pm	53
<b>Didcot</b> , Cornerstone	Tuesday 31 October, 3pm – 7pm	43
<b>Berinsfield</b> , Church Hall	Tuesday 7 November, 3pm - 7pm	52
<b>Wheatley</b> , Village Hall	Thursday 9 November, 3pm – 7pm	55
<b>Thame</b> , Town Hall	Monday 13 November, 3pm – 7pm	42
<b>Chalgrove</b> , Village Hall	Monday 23 October, 4pm-8pm Friday 17 November, 3pm – 7pm	149

### **Consultation Involvement and Engagement**

Notification of the Representation Period was sent to 7,582 bodies and individuals on the Council's database by letter or email. This correspondence set out how copies of the relevant documentation and submission forms could be accessed, how to submit representations, and deadlines for submission. This information was also made available on the Council's website together with a consultation factsheet and video for further guidance.

### **Statutory Notice & Press Releases**

A Statutory Notice was produced. The notice was advertised on the Council's website setting out the Statement of Representation Procedure. A copy is shown in Appendix 2. A notice was placed in The Herald series on Wednesday 11<sup>th</sup> October 2017, The Oxford Times on Thursday 12<sup>th</sup> October 2017 and The Henley Standard on Friday 13<sup>th</sup> October 2017, setting out the Statement of Representation Procedure. The Statutory Notice highlighted when Planning



Officers were available to provide information and guidance during the Public Exhibitions/ drop-in events detailed in Table 3.

Press releases were issued to local newspapers providing updates on the Local Plan, Full Council outcome and drop-in dates. Regular social media updates were posted online throughout the consultation and prior to each drop-in event. Updates on the Local Plan were posted to the Council's website.

### **Leaflets, Posters and Bulletins (paper and email)**

Posters were provided to all parish councils, St Mary's Church, Wallingford, Culham Parochial school, Henley Information Centre, and Cornerstone, Didcot to help advertise drop in events. The posters were also posted outside event locations to further advertise each drop-in exhibition. Leaflets providing information on the consultation were available at each event.

A feature article was included in the Autumn 2017 Council's newsletter '[Outlook](#)' which is distributed to all residents through the post and is also available on the Council's website. Email and social media bulletins were provided during the consultation.

### **Document Availability**

Copies of the Plan, supporting documents and comment forms were made available in the following libraries and leisure centres across the district:

Abbey House, Abingdon, Abbey Sports Centre Berinsfield, Benson Library, Berinsfield Library, Chalgrove Post Office, Chinnor Library  
Clifton Hampden Post Office, Cornerstone, Didcot, Culham Science Centre, Didcot Library, Didcot Wave Leisure Centre, Goring Library  
Henley Library, Sonning Common Library, Thame Library, Wallingford Library, Watlington Library, Wheatley Library, Woodcote Library.

The documents and comment forms were also available on the Council's website.

### **Targeted Events and Workshops**

Officers considered the target groups to be to be:

- Anyone who lives, studies or works in South Oxfordshire
- All South consultees on database includes those who responded to the previous consultations
- Statutory "specific and general consultation bodies" (set out in Reg 2)
- Parish and Town Councillors
- District Councillors

These target groups were notified of Public Exhibition drop-in dates by letter, email, website, newsletters, posters, social media, press releases. In addition, a briefing was held for Parish Councils and Neighbourhood Planning groups on Wednesday 11 October 2017 in Didcot. Representatives from the groups shown in Table 4 attended the meeting.

Officers met with Disabilities/Access groups on 5 April 2017 as part of the Regulation 18 consultation.

**Table 4: Attendees of the Parish Council and Neighbourhood Planning Group Briefing on 11 October 2017**

Aston Rowant Parish Council	Lewknor Parish Council
Aston Rowant Neighbourhood Planning Group	Lewknor Neighbourhood Planning Group
Beckley and Stowood Neighbourhood Planning Group	Long Wittenham Parish Meeting
Berinsfield Parish Council	North Moreton Parish Council
Benson Parish Council	Sonning Common Parish Council
Benson and Crowmens Pc	South Stoke Parish Council
Berinsfield Neighbourhood Planning Group	South Stoke Neighbourhood Planning Group
Berrick Salome Parish Council	Stoke Talmage Parish Meeting
Berrick Salome Neighbourhood Planning Group	Swyncombe Parish Council
Chalgrove Parish Council	Tetsworth Parish Council
Chinnor Parish Council	Tetworth Neighbourhood Planning Group
Clifton Hampden Parish Council	Thame Town Council
Crowmarsh Parish Council	Thame Neighbourhood Planning Group
Culham Parish Council	Toot Baldon Parish Council
Didcot TC	Towersey Parish Council
Dorchester Parish Council	Towersey Neighbourhood Planning Group
Ewelme Parish Council	Wallingford Town Council
Goring-on-Thames Parish Council and Neighbourhood Planning Group	Wallingford Neighbourhood Planning Group
Great Haseley Parish Council	Warborough Parish Council
Harpsden Parish Council	Waterstock Parish Meeting
Henley on Thames TC	Watlington Parish Council
Henley-on-Thames Neighbourhood Planning Group	Watlington Neighbourhood Planning Group
Holton Parish Council	West Hagbourne Parish Council
Horspath Parish Council	Wheatley Parish Council
Kidmore End Parish Council	Wheatley Neighbourhood Planning Group
Kidmore End Neighbourhood Planning Group	Woodcote Parish Council

## **Representations received**

### **Number of Representations received**

686 bodies or individuals made representations on the SODC Publication Local Plan. A further 25 bodies or individuals made late submissions.

Some representors did not use the representation forms and these representors tended not to indicate whether they considered the Publication Local Plan to be legally compliant or sound, or whether they wanted to attend the Examination Hearings.

The following process was used to ensure the comments received by email or letter were treated in the same way as those received on the representation forms:

- All responses were logged onto the system, noting date received and response type (email, letter);
- Responses were allocated to a coding officer and the coding officer logged;
- Once coded, the response was allocated to a processing officer and the processing officer logged;
- The response log assisted in monitoring progress and provides an audit trail;
- All responses were then coded by Planning Policy Officers to identify which policy, strategy or paragraph the response refers to;
- The coded responses were then added into the online consultation software used at that time “Objective”;
- Original responses redacted to remove personal information.

## Regulation 19 Responses by Chapter

### Process

Overall 15 people commented on process:

- Support 0
- Comment 14
- Object 1

The following key themes were identified in response to this policy:

- a. Responding to the consultation was overly complicated and confusing.
- b. Consultation has not reached people unable to engage using e-consultation methods.
- c. Not all representations made to SODC during the consultation process have been properly registered and considered.
- d. The consultation materials led respondents to believe that their previous objections would be passed onto the Inspector.
- e. The plan has not changed in response to previous objections. The 947 signature Chalgrove petition was also ignored.
- f. Sustainability Appraisal was skewed in favour of an unsustainable development on Chalgrove Airfield by injecting "inconsistencies", since removed, revealing the weakness of the case for the Chalgrove site.
- g. A very detailed critique of the Sustainability Appraisal received a response without explanation or detail. This is not a viable response to a consultation.
- h. The proposal for Chalgrove is illegal because the land is subject to a lease which does not expire until after the end of the local plan period.
- i. The site selection topic paper needs to be published alongside the publication version of the plan.
- j. The plan does not include a key diagram or similar. Inclusion of a key diagram would assist in the interpretation of the strategy.

### The Council's summary response to the main themes

The consultation carried out was designed to meet the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Previous consultation exercises carried out under Regulation 18 actively sought feedback on the alternative sites being considered, the types of policy to be included and the spatial strategy which could be pursued.

The Regulation 19 consultation no longer seeks views on alternative options, but instead presents the opportunity to comment on the policy content of the Local Plan, within a specific remit. The remit for this consultation relates to representations on legal compliance and the 'Tests of Soundness'. Regulation 19 is a formal stage of consultation aimed at identifying whether a plan is "sound" in accordance with the tests set out in NPPF1 Para 182 (NPPF 2018 Para 35). Before commencing any formal examination in public hearing sessions, the independent inspector will also make an assessment as to whether the requirements of the Duty to Cooperate have been met. Responding to the questions posed by the tests of soundness is challenging for non-planners but officers have sought to highlight the need to focus on the "Tests of Soundness" to focus the consultation for the inspector.

It has now been deemed necessary to repeat the Regulation 19 consultation due to the emergence of key evidence during the consultation. Officers have noted the challenges encountered by respondents to this Regulation 19 consultation and will produce an updated guide for respondents and an updated video to help them understand how to respond to the plan.

A focus on e-consultation methods was necessary to make best use of resources, however, in accordance with the SCI adopted in 2017, officers have also sought to engage outside of electronic means by running a series of drop in events to allow respondents to meet with officers face-to-face, running advertisements in local newspapers, and by making paper copies of the forms available at deposit locations.

Extensive consultation on the local plan has been carried out over a number of years and has taken every precaution to ensure that all consultation responses have been logged and assessed. However, officers have acknowledged and understood the issues that have been raised with regard to the missing representations to the previous consultation.

Respondents may be frustrated if they have objected to particular proposals that continue to be carried forward by the plan, this does not mean that the responses have not been acknowledged and investigated by officers who have sought to address the issues that have been raised.

The presence of a leaseholder on a part of the Chalgrove site is not a legal constraint to the allocation and delivery of the site. However, it is a delivery matter which officers are working in partnership with the landowners to address.

The process of preparing a plan and its accompanying Sustainability Appraisal is an iterative process that will seek to remedy issues when they are raised, correct any errors and provide a sound Plan with robust evidence to support it. When undertaking the Sustainability Appraisal process there will necessarily be subjective views about the specific details of the assessment. While individual comments have been considered these do not alter the outcome of the assessment.

The topic papers have been produced to document the site selection process; the approach to site selection is set out in the plan. The topic papers are not a requirement for a Regulation 19 consultation. There is no requirement for Local Plans to include key diagrams unless “broad locations” for development are identified. However, a key diagram has now been included to provide clarity and aid understanding of the Plan’s proposals.

**The following changes will be made in response to the consultation:**

- Inclusion of a key diagram.
- Inclusion of guidance for respondents on website and at deposit locations.

## Whole Plan

Overall 46 people commented on the Plan as a whole:

- Support 14
- Comment 27
- Object 5

The following key themes were identified in response to this policy:

- a) Unmet needs of Oxford should be met adjacent to Oxford or within easy commuting distance to the city. Chalgrove is less sustainable than green belt sites closer to Oxford even though Culham (a Green Belt site) is allocated. Consider Grenoble Road and Blackbird Leys as alternatives;
- b) The development focus for Oxford should be to the north east in recognition of the planned infrastructure investment in the Cambridge, Milton Keynes, Oxfordshire corridor set out in 'Helping the Cambridge, Milton Keynes and Oxford corridor reach its potential'.
- c) Infrastructure needs have not been adequately addressed by the plan.
- d) The plan is not deliverable within the plan period;
- e) The Sustainability Appraisal is inadequate. Alternative uses of Wheatley Campus are not assessed.
- f) Development in smaller villages is unsustainable.
- g) Insufficient consideration given to how climate change will affect South Oxfordshire's economy and society.
- h) The flood risk assessment for the allocation of Chalgrove Airfield is inadequate.
- i) The plan does not set out how the five-year housing supply has been calculated nor how the backlog in housing supply has been addressed.
- j) The plan does not comply with the Local Transport authorities plans in accordance with Regulation 10 (1) (a) and (b) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- k) The plan does not comply with the national waste management plan in accordance with Regulation 10 (1) (a) and (b) of the Town and Country Planning (Local Planning) (England) Regulations 2012;
- l) Duty to cooperate not fulfilled. Although there is a separate Equality and Human Rights Act Check, this is not incorporated into the Plan e.g. the diagrams on page 10 & 14.
- m) The Plan is unlikely to be adopted during 2018, therefore an end date of 2033 does not comply with the NPPF requirement for a 15-year plan from adoption. The plan period should be extended.
- n) Buckinghamshire NHS Trust, Aylesbury Vale and Chiltern Clinical Commissioning Groups have not been consulted.
- o) Insufficient engagement has been carried out with the Pyrton and Shirburn Neighbourhood Plan Group has been carried out to secure development at Watlington.
- p) Consultation is seemingly designed to prevent responses. The Council advised that people should concentrate on legal and deliverability issues. This has led many to understand that their objections previously made were not required at this stage.

### **Wycombe District Council**

SODC and WDC have signed a Memorandum of Understanding (6 September 2017) which agrees: That Wycombe District and South Oxfordshire lie in separate but adjoining Housing Market Areas and Functional Economic Market Areas. Neither authority is requesting the other authority to accommodate unmet needs; To cooperate on matters concerning strategic transport networks which affect both local authorities and to consult on policies and proposals that affect the strategic network or which have cross boundary impacts; That at the time of signing, both authorities agree that they are complying with the Duty to Cooperate.

### **Aylesbury Vale District Council**

AVDC consider the plan to be sound and legally compliant. AVDC do not need a seat at the examination table unless the Inspector specifically wishes to have neighbouring Councils represented there for a session on the 'Duty to Co-operate'.

### **The Council's summary response to the main themes**

The Oxford Green Belt which lies within South Oxfordshire has been assessed against the purposes of Green Belt by the Local Green Belt Study (2015). While there is logic in allowing the outward growth of Oxford across administrative boundaries to meet unmet development needs, this must be balanced against the landscape's capacity for change. National planning policy places a high emphasis on the retention of Green Belt land and expects land which contributes most to the purposes of Green Belt to be preserved under that designation (NPPF 2018, Para 133). By examining all strategic development options across South Oxfordshire, it has been possible to identify land which can meet development needs while minimising the impact on the Green Belt and the landscape. The Sustainability Appraisal makes it clear which sites have been found to be more sustainable and is consistent with the approach set out in the Local Plan. The sites allocated include some Green Belt sites and some non-Green Belt sites, however there is an individual rationale for each allocation as well as generic exceptional circumstances.

Planned infrastructure investment to the north of Oxford may mean that future development needs of the city are met more appropriately to the north of the city this is not a consideration for this Local Plan. The vision document 'Helping the Cambridge, Milton Keynes and Oxford corridor reach its potential', produced by the Government, sets out the potential of the corridor. Land use planning is required to be undertaken at a local level by Local Planning Authorities. The forthcoming Oxfordshire Joint Statutory Spatial Plan (JSSP) is intended to be best placed to review the wider impacts of Oxford's growth. Oxford City Council published a Proposed Submission Local Plan during November 2018 which quantifies the amount of further growth required at Oxford to meet the requirements of the Oxfordshire Housing and Growth Deal. The proportion of the unmet housing need for Oxfordshire to be met within South Oxfordshire district is proposed to be the outstanding 4,950 homes not met elsewhere. This housing need is now being provided for proactively by the revised Local Plan within extensions to Oxford.

Infrastructure policies in the plan include INF1-INF4. The provision of infrastructure to support the plan is detailed specifically within the Infrastructure Delivery Plan (IDP) which will be submitted alongside the plan for examination. This IDP will be critical to ensuring that the plan is deliverable within the plan period. The proposals for

development will necessitate investment in highways infrastructure which will be guided by the Highways Authority. A draft version of the Viability Study, which details the deliverability of the plan, may be viewed on our website. The final version of the Viability Study will accompany the revised publication version of the Plan.

Officers will continue to work with Homes England (formerly the Homes and Communities Agency) to establish whether the Chalgrove Airfield development will be deliverable or developable over the plan period. It is noted by the revised Local Plan that not all allocations will be built out over the plan period and the Plan is realistic in reflecting the anticipated build rates of the sites at the time of publication. However, the level of development envisaged over the plan period will meet the need for development identified. The continued build out of sites after the plan period does not mean that the Plan is not sound, as the need is met by the sites' delivery up until the end of the plan period.

The Sustainability Appraisal of the plan has been prepared by independent consultants Wood Plc (formerly Amec Foster Wheeler), who have amassed considerable experience in the assessment of plans as required under Section 19(5) of the Planning and Compulsory Purchase Act 2004. Officers are confident that the appraisal of the plan has considered all reasonable alternatives and considered their sustainability against a suitable range of environmental, social and economic indicators.

The Sustainability Appraisal includes the consideration of alternatives within Section 5 of the Pre-submission (Regulation 19) Sustainability Appraisal. The rationale specifically is included on page 99. Wheatley campus has been adequately assessed. The surrounding land uses are residential and no other use was deemed to be a reasonable alternative. In addition, the Council's Employment Land Review (Table 5-2) included a survey of clustered employment sites which included site C16 London Road Industrial Estate at Wheatley.

The Sustainability Appraisal found that allowing some housing in smaller settlements would help to meet local need and could support local services (See Table 5.3: Reason for Rejecting/Selecting Spatial Options). The spatial strategy of the published plan is a blend of the development distribution options tested, rather than favouring any one scenario in isolation. Drawing on a combined approach to the distribution of new housing development enables a series of benefits to be delivered through the Local Plan. This strategy is subject to review in the emerging Local Plan.

The response to climate change is embedded within national planning policy in the form of the NPPF, which the plan must comply with. Specifically, Objective 8 of the plan refers to climate change and will be monitored with a framework of appropriate indicators. In addition, Policy DES9: Promoting Sustainable Design requires new development to be designed to improve resilience to the anticipated effects of climate change.

Level 2 Strategic Flood Risk Assessment has been carried out in support of the proposed allocations. At this stage of plan preparation, it is necessary to ensure that the allocation is developable for the quantum of development proposed. Detailed



flood risk assessment and modelling will be carried out by the applicants at application stage.

The approach to calculating the five-year housing land supply will be set out in the Housing Topic Paper which will accompany the revised pre-submission publication of the plan. This will support the housing policies that are subject to modification in the revised Local Plan. An NPPF compliant end date to the plan has been agreed to be 3034 given the amended timescales for Local Plan production.

The diagram on Page 10 of the Plan shows the evidence base; the Equalities and Human Rights Act is part of the evidence used to inform the Plan. The act was appropriately referenced in scoping of the Sustainability Appraisal. The diagram on page 14 does refer to the Equalities and Human Rights Act as it includes references to specific pieces of evidence which have a different purpose, e.g. to establish a requirement for growth.

Extensive consultation with Oxfordshire County Council as both Highways Authority and Waste and Minerals Authority has been carried out and officers are confident that the plan is in general conformity with both the transport and waste plans for the area. There is no requirement for plans to set out explicit references to what has influenced them, however the transport policies are declared as influences on the Plan at Paragraph 7.10-7.11 and the waste policies referred to in the Plan and the diagram on page 10.

Officers note that Buckinghamshire NHS Trust was not notified of the consultation despite this trust covering the area of Thame. However, all necessary Clinical Commissioning Groups have been consulted. Buckinghamshire NHS Trust has now been contacted to confirm the Trust's interest in further consultations.

The Council's response to the issues raised with the consultation methods are set out under the response to the process.

**The following changes will be made in response to the consultation:**

Allocations are proposed South of Grenoble Road, at Northfield and North of Bayswater Brook adjacent to Oxford, to help meet the housing needs generated as a consequence of the Oxfordshire Housing and Growth Deal.

The plan period has been extended to 2034 to reflect anticipated adoption during 2019.

## **Policy Map**

Overall 4 people commented on the Policy Map:

Support 0  
Comment 3  
Object 1

The following key themes were identified in response to this policy:

- a) Wallingford Site B is colour coded as Housing Allocations (H2), which relate to Didcot;
- b) Is it possible to group together different types of designation in the key?
- c) Local Wildlife Sites, Local Geological Sites and Ancient Woodland are not currently shown on the policies map.

## **Oxfordshire County Council**

Mineral Safeguarding Areas could be added to the Policy Map.

## **Reading Borough Council**

The proposal for a new Thames crossing is of significant strategic importance and would rely on the provision of land within South Oxfordshire, RBC would expect to see land safeguarded for this proposal within policy TRANS3 (Safeguarding of Land for Strategic Transport Schemes).

The broad alignment shown in the Strategic Outline Business Case, also shown on the attached map, should be on the Local Plan Policies Map. This would fully reflect the importance of delivering this scheme as soon as possible to help to address transport issues in the area around Reading.

## **Thame Town Council**

The map in Appendix 13 currently identifies both the town centre and primary shopping frontage boundary of Thame. Paragraph 10.20 also states that the made Thame Neighbourhood Plan identifies a secondary shopping frontage and that this is displayed on the Policies map, however this isn't the case.

## **The Council's summary response to the main themes**

The new Thames crossing in the Reading area is referred to in TRANS1. There is not currently sufficient evidence to secure a safeguarded route. The map provided is indicative. Safeguarding cannot be recommended because it could not be evidenced or provided for within the Plan period.

## **The following changes will be made in response to the consultation:**

- The NPPF 2018 removes the requirement for Primary and Secondary Frontages, but reaffirms the importance of Primary shopping areas and town centre boundaries being identified. The revised Local Plan will respond to this change of approach.
- The colour coding for housing allocations will be corrected at Wallingford.
- The key will be grouped for ease of reference.
- Minerals Safeguarding Areas (as per the Oxfordshire Minerals and Waste Plan Part 1: Core Strategy, 2017), will be added to the policies map.



## **Foreword**

Overall 1 person commented on this section:

Support 0

Comment 1

Object 0

The following key theme was identified in response to this policy:

Elected members have made their decision and will not be swayed by public opinion.

### **The council's summary response to the main theme**

The comments in the introductory foreword draw on guidance contained in the National Planning Policy Framework and reflect the difficult challenges for the Council. There is no suggestion that compliance with national policy means that consultation views were not considered when preparing the Plan.

### **The following changes will be made in response to the consultation:**

A new forward for the Local Plan will be produced by the new leader of the council and planning cabinet member.

## **Chapter 1: Introduction**

Overall 14 people commented on this Chapter:

- Support 1
- Comment 3
- Object 10

The following key themes were identified in response to this policy:

- a) The introduction should refer to the NPPF.
- b) There is a legal requirement to meet Oxford's unmet housing needs. Oxford's growth constraints have been underplayed and the Council has not responded positively to the further work carried out by the Oxfordshire Growth Board on the housing needs of Oxford. The district should accommodate 4,950 dwellings to help meet Oxford's unmet need for housing.
- c) The Plan is unlikely to be adopted during 2018, therefore an end date of 2033 does not comply with the NPPF requirement for a 15-year plan from adoption. The plan period should be extended.
- d) There is insufficient reference to community led plans.
- e) Neighbourhood Development Plans should only allocate sites when they have been found to achieve the highest available level of sustainability in accordance with the NPPF. Protection is needed against those wishing to promote development in the smaller villages to help fund projects.
- f) There is a lack of understanding of both the scale of the ageing population and under occupation. Greater publication of the opportunities to self-build are needed.
- g) Responding to the consultation was overly complicated and confusing.
- h) Responses to the plan have not been considered.

## **Historic England**

Welcomes the use of the Heritage Impact Assessment and the Oxfordshire Historic Landscape Characterisation Project within the evidence base but suggest that a Heritage Topic Paper is prepared to reflect on other sources of evidence such as Conservation Areas/Management Plans, Extensive Urban Surveys and archaeological assessments. Historic England is satisfied that the Local Plan is based on adequate, up-to-date and relevant evidence about the historic environment.

## **Oxfordshire Clinical Commissioning Group (CCG)**

Support the swift progression of the Plan and request continued collaboration in its development.

## **The Council's summary response to the main themes**

The introduction refers to the NPPF and the need to be consistent with national policy at Para 2.3 (iv).

The South Oxfordshire Plan has been revised to include substantial allocations for residential led development adjacent to Oxford to help to meet the housing growth all Oxfordshire authorities committed to through the Housing and Growth deal.

The soundness of the plan will be examined by an independent inspector. An NPPF compliant end date for the plan has been agreed as 2034.

Specific reference to community led plans have not been made throughout the plan; however, the plan is heavily influenced by what these plans aim to achieve and the sites brought forward by them. The amendments suggested will be partially incorporated to reflect the level of influence that community led plans have had on the Local Plan. Paragraph 2 of the NPPF requires that all Neighbourhood Development Plans should take account of the NPPF in their preparation. Issues with the level of development for smaller villages has been clarified in the revised local plan with no requirement for development in smaller villages.

The approach to needs of the ageing population and the issues of under occupation is supported by evidence including detailed settlement assessment and Strategic Housing Market Assessment. Paragraph 4.33 third bullet point references a range of new homes which includes self-build. The Council has fulfilled the statutory obligations regarding self and custom build as prescribed by the Self-build and Custom Housebuilding Act 2015 as amended by the Housing and Planning Act 2016, which requires local authorities to maintain a register of those wishing to self-build and to identify enough sites to meet this need.

The Council's response to the issues raised with the consultation methods are set out under the response to the process.

Officers note and supports the commitment to collaboration from Oxfordshire CCG.

**The following changes will be made in response to the consultation:**

- The supporting text will be amended to note that community-led plans and Neighbourhood Development Plans will enable parish and town councils to have a say on how their local area is shaped.
- Allocations are proposed South of Grenoble Road, at Northfield and North of Bayswater Brook adjacent to Oxford, to help meet the housing needs generated as a consequence of the Oxfordshire Housing and Growth Deal.
- The plan period has been extended to 2034 to reflect anticipated adoption of the Plan during 2019.

## **Chapter 2: The Publication Version**

Overall 4 people commented on this Chapter:

- Support 1
- Comment 0
- Object 4

The following key themes were identified in response to this policy:

- a) A landowner within the Culham allocation was unaware that the proposed development boundary includes their property and have not been approached to make the land available for development.
- b) The Chalgrove development site does not meet soundness criteria.
- c) The Site Selection Topic Paper is an essential supporting document and was not published alongside the consultation materials.

### **Historic England**

Welcomes the use of the Heritage Impact Assessment and the Oxfordshire Historic Landscape Characterisation Project within the evidence base but suggest that a Heritage Topic Paper is prepared to reflect on other sources of evidence such as Conservation Areas/Management Plans, Extensive Urban Surveys and archaeological assessments. Historic England is satisfied that the Local Plan is based on adequate, up-to-date and relevant evidence about the historic environment.

### **The Council's summary response to the main themes**

The development boundary for the proposed allocation at Culham has been amended.

Officers will continue to work with Homes England (formerly the Homes and Communities Agency) to establish whether the Chalgrove Airfield development will be deliverable over the plan period.

The Site Selection background paper has been produced to document the site selection process; the approach to site selection is set out in the plan. The topic papers are not a requirement for a Regulation 19 consultation.

### **The following changes will be made in response to the consultation:**

- The Culham allocation boundary will be revised to remove the Culham Brakes SSSI from the allocation.

### **Chapter 3: Visions and Objectives**

Overall 26 people commented on this Chapter:

- Support 6
- Comment 2
- Object 18

The following key themes were identified in response to this policy:

- a) Some support for the vision was expressed, balanced by comments regarding the lack of local distinctiveness and omission of measurable outcomes. The vision was considered to promote development in rural areas which would detract from the attractiveness of the district. One respondent considered that the vision should be working towards stabilising the population and pointed out that the district had thus far failed to meet reasonable expectations in terms of carbon emissions, affordable housing, travel, and green infrastructure.
- b) Insufficient consideration of sustainable travel and encouragement of modal shift had been given.
- c) A balance between housing and employment land supply needs to be found to counter the effects of out-commuting, particularly in the four main towns. There are few employment opportunities at Chalgrove. Science Vale, around Culham, the Northfield site and Grenoble Road are better alternatives and in accordance with the vision.
- d) Failure to acknowledge the need to accommodate in full South Oxfordshire's proportion of Oxford's unmet housing need, achieve sustainable patterns of development, and meeting the development requirements that arise as a consequence of maintaining a successful economy i.e. jobs, homes and infrastructure.
- e) Unmet needs arising from Oxford should be met where the need arises i.e. around or near to Oxford city. Acknowledgement of the need for a review of the inner boundary of the Green Belt specifically to enable the physical expansion of the urban area of Oxford should be included in the plan.
- f) The Chalgrove and Culham development sites are not justified in light of the housing allocations expanding towns and villages.

### **The Council's summary response to the main themes**

The vision aspires to meet development needs in a way that ensures that the natural and historic features of the district are retained and enhanced. The vision sets out an approach to strengthen the heart of the district with allocations at strategic locations where employment can be supported. Paragraph 4.6 of the Plan explains why the strategy includes development at the heart of the district. Historically, growth in South Oxfordshire has focussed on Didcot and the market towns of Thame, Wallingford and Henley-on-Thames. Other than Wallingford, these towns are located towards the boundary of our district; the continued focus on the periphery of the district has led to a reduction in development to support the investment in services and infrastructure within the heart of South Oxfordshire.

It is considered that the vision and its supporting text are specific and relevant to South Oxfordshire. It is not the intention to set out monitoring intentions in the vision; these are shown in Chapter 12 of the Plan and includes specific indicators, targets, sources and data. It is the purpose of the Authority Monitoring Report (AMR) to



assess the extent to which policies in the plan are being achieved. It is considered that the policies in the plan are reflective of what is contained within the vision. Previous aspirations for reductions in carbon emissions, affordable housing, reductions in carbon emissions, and improvements to affordable housing, travel, and green infrastructure may not have been achieved in the past, however the vision is intended to be aspirational and it is the intention of the Plan to achieve improvements in all these areas.

The Plan acknowledges that it cannot influence where people choose to commute to work, and the location of some of the towns and villages within the district mean that there will inevitably be some crossings of boundaries to travel to work. Paragraph 3.9 refers specifically to sustainable travel. It is considered that this aspect of the vision is adequately supported by Objective 4.2 and Policy TRANS2. The Plan itself sets out a sustainable approach to allocating employment land to meet the required needs.

At the time of publication of the Plan, the unmet housing need for Oxford was being provided for proactively until a specific requirement could be evidenced. Oxford City Council published a Proposed Submission version of its Local Plan in November 2018. It is now clear that in order to meet the level of growth envisioned by the Oxfordshire Housing and Growth Deal, there is a need to make further land allocations. Accordingly, a second Publication version of the Plan has been produced which proposes significant residential allocations of land adjacent to Oxford.

The justification of development sites is not a topic which the vision would express in a plan. Responses to the objections to specific sites are provided against the proposed allocation policies in this report.

**The following changes will be made in response to the consultation:**

Allocations are proposed South of Grenoble Road, at Northfield and North of Bayswater Brook adjacent to Oxford, to help meet the housing needs generated as a consequence of the Oxfordshire Housing and Growth Deal.

## Objectives

### Objective 1 – Settlements

Overall 25 people commented on this objective:

- Support 5
- Comment 2
- Object 18

The following key themes were identified in response to this objective:

- a) The need to address the unmet housing needs of Oxford should be included in the objective.
- b) The Oxfordshire Growth Board has confirmed that it will commit to building 100,000 homes in exchange for more than £215m in government funding. An Oxfordshire Joint Strategic Spatial Plan will also be drafted and it is unclear how this Local Plan will respond. The emerging plan should also respond to the National Infrastructure Structures' "Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc" report.
- c) Development of Science Vale will not support Oxford.
- d) Support for this objective and its link to the vision. Consistent with NPPF Core Principle 11. Support the commitment to supporting the vitality of our villages.
- e) The identification of Benson as a large village in the settlement hierarchy is supported.
- f) The Chalgrove development site does not support the settlement hierarchy because of its remoteness. Development is supported at Science Vale which Chalgrove is removed from. There is conflict between the plan for development at Chalgrove and the objectives and it should be removed as an allocation. The proposed level of development will destroy the character of the village and turn it into an urban community. The proposal does meet locally identified housing need.
- g) Delivery of new development in the heart of the district, the growth of our market towns and our villages is a matter of concern because the plan makes no credible provision for improvements to the small roads between villages.
- h) A reference to "healthy communities" could be included in Objective 1.3.
- i) Community Led Plans are only mentioned here and not within the rest of the Plan. They should have greater influence and credibility with regards to small villages.

### The Council's summary response to the main themes

Objective 1 is related to distribution, Objective 2 concerns meeting housing needs. It would therefore be inappropriate to include South Oxfordshire's commitments to meeting housing needs in unrelated objectives. The level of unmet housing need for Oxford is being provided for proactively in the Plan.

Local plans will complement the preparation of the more strategic growth plans. The period encompassed by the Oxfordshire JSSP is longer term than the local plans in the area, and will need to make housing delivery recommendations. However, it should be noted that the growth plan is in its very initial stages of development. Policy TRANS1 and TRANS1a in the revised Local Plan commits to working with others to understand the potential benefits of proposals like those referred to in the National Infrastructure Structures report.

The Chalgrove site is intended to support and enhance the current function of Chalgrove, which the Plan's evidence base has identified as a large village in a sustainable location. While the strategy in the Plan makes it clear that major new development is supported in Science Vale, development at larger villages such as Chalgrove will also help support and enhance their roles. As a development site the allocation supports the settlement Objectives within this plan. The Plan has been developed with the aim of achieving the objectives therefore no conflict is identified, and officers do not consider that there are any specific conflicts with the spatial strategy with the potential allocation of Chalgrove.

All sites within the Plan, including Chalgrove conform to the strategy and associated Policy set out in Policy STRAT1. The housing requirement is derived from the District as a whole, and contributions towards meeting the growth envisaged by the Oxfordshire Housing and Growth Deal. The need for both market and affordable homes to meet the needs of all members of the community will be addressed by the proposed allocations and policies in the revised Local Plan.

The necessary infrastructure to support the proposals within the Plan are included within relevant policies and the details are provided within the Infrastructure Delivery Plan.

A reference to the health of communities is included in Objective 6.3.

Whilst specific reference to community led plans may not be explicit throughout the plan, the plan is heavily influenced on what these plans aim to achieve and the sites brought forward. The Plan will be amended to reflect the level of influence community led plans have on the Local Plan.

The support for the identification of Benson as a large village and the commitment to supporting the vitality of the district's villages is noted.

**The following changes will be made in response to the consultation:**

- The supporting text will be amended to include reference to the shaping of local areas through neighbourhood planning and community engagement.

## **Objective 2 – Housing**

Overall 9 people commented on this objective:

- Support 3
- Comment 1
- Object 5

The following key themes were identified in response to this objective:

- a) The objective is not clear.
- b) The objective overlooks the need for the Local Plan to deliver housing to meet the needs of Oxford City.
- c) While the aspiration of Objective 2.3 is agreed with as a key requirement of the Duty to Cooperate, there are significant reservations regarding the Council's ability to achieve this when they are already seeking to deliver less than the agreed apportionment identified through the Oxfordshire Growth Board process.
- d) Commuting from Chalgrove to other areas of South Oxfordshire is difficult due to poor roads, traffic congestion and lack of public transport. Commuting would occur to places High Wycombe, London, and other M40 destinations in order to secure high paid jobs. Such people would not be helping the needs of South Oxfordshire.
- e) Reference to the 2016 HAPPI 3 report suggest that even if all the new housing in the district were to be designed and located as suitable for the elderly, the needs of that sector would still not be met. Self-build demand would also not be met and nor will self/custom building make a significant contribution to housing supply.
- f) Support for the Objective.

### **The Council's summary response to the main themes**

The aim of this objective is to ensure that the needs for housing and employment that has been evidenced by the District and its neighbours can be provided for through the Plan where it is deemed to be required of South Oxfordshire. However, this objective also needs to ensure that development needs are reflective of the Districts constraints, issues and opportunities and how that will influence the amount and locations of development.

Objective 2.3 is the appropriate objective to refer to unmet needs across the Housing Market Area. The housing needs identified for South Oxfordshire were derived from the Growth Deal which in turn was derived from evidence contained in the 2014 SHMA. The housing requirement for the revised Local Plan has now been reviewed to ensure that it meets the requirements of the governments standard housing methodology (irrespective of the outcome of the current consultation regarding the date of the population projections), it provides the appropriate uplift to consider the Oxfordshire Housing and Growth Deal and provides no further uplifts or restrictions.

The Plan took a proactive approach to meeting some of Oxford's housing requirements ahead of confirmation of the scale of the unmet need for development to support the City. In response to the consultation and the publication of a proposed submission local plan by Oxford City Council, the South Oxfordshire Plan has been revised to include allocations to meet development needs adjacent to Oxford, but is

reliant on Oxford city confirming its planned delivery of its commitment to the growth deal/SHMA.

It is acknowledged that within any development site, there is the possibility that a proportion of residents may choose to commute outside of the District. Chalgrove does not have any particular differences that would suggest that commuters would choose to live here in order to be able to afford to live in this location.

The Objective makes adequate reference to both self-build and older persons accommodation. Policy H12 makes clear that evidence will be used to identify and bring forward further appropriate locations for self-build and custom build in addition to the 3% provision on strategic allocations. Policy H13 also ensures that further sites for homes for the elderly can be identified through Neighbourhood Development Plans (NDP) in addition to the proportions sought by the plan on larger strategic sites.

Support for the objective is noted however, some further clarification of the wording has been made.

**The following changes will be made in response to the consultation:**

Objective 2.2 will be amended to refer to deprivation issues rather than poverty and social exclusion.

### **Objective 3 – Economy**

Overall 6 people commented on this objective:

- Support 1
- Comment 0
- Object 5

The following key themes were identified in response to this objective:

- a) Sustainable locations close to Oxford should be selected to meet Oxford's unmet housing needs in accordance with NPPF Paragraph 17.
- b) Objective 3 doesn't acknowledge the very significant contribution Oxford makes to the UK's economy and Objective should reflect the Local Enterprise Partnership's Strategic Economic Plan.
- c) The allocation at Chalgrove is at odds with this objective. Growth here is unsustainable and disproportionate to Chalgrove village. Given the rural location and lack of infrastructure journeys to work will not be sustainable. No other main towns are accessible from Chalgrove, other than by car.
- d) No consideration given to a programme of industrial development on Chalgrove airfield to meet the needs of the proposed new large population.
- e) Economy Objectives will not be achieved unless amendments are made to Policy STRAT 2 and Policy STRAT 3. Housing targets will need to be increased close to where people work or where employment opportunities exist, and it is accessible by non-car modes of transport.
- f) Tourism is not protected from developers or Neighbourhood Development Plans (NDP) and these entities do not sufficiently protect our built and natural assets.
- g) Support for the Objective.

### **The Council's summary response to the main themes**

In addition to Objective 3.3. the Plan has objectives relating to distribution of development to appropriate locations and settlements (OBJ 1.1 – OBJ 1.4). The level of unmet housing need for Oxford was provided for proactively by the publication Plan. The specific requirement for additional development to meet Oxford's unmet needs has now been set out in Oxford City Council's Publication Local Plan (November 2018). In response, the revised publication version of the Plan proposes significant land allocations adjacent to Oxford to contribute to meeting the requirements of the Oxfordshire Housing and Growth Deal.

The Plan reflects the aims of the Oxfordshire LEPs Strategic Economic Plan. The economic objectives 3.1 – 3.7 are considered to reflect its aims.

This objective aims to ensure that the level of provision of housing is in proportion to the amount of jobs and employment that the District makes provision for. One development areas inclusion is not relevant specifically to this objective, in any case the loss of the housing proposed on this site, as suggested, would mean that the balance sought by this Objective could not be achieved. The proposed Chalgrove site has a nearby business park and employment uses proposed on site, and uses which are supported by safeguarded land to continue their operations.

The comments on achievement of the economic Objectives are noted. Officers consider that these are specific concerns about Plan policies rather than the wording

of this Objective. These concerns have been addressed under the response to the individual policies STRAT2 and STRAT3.

It is considered that the suite of Environmental and Design policies included within the Plan offer sufficient protection to built and natural assets.

The support for the objective is noted.

**The following changes will be made in response to the consultation:**

None

#### **Objective 4 – Infrastructure**

Overall 11 people commented on this objective:

- Support 3
- Comment 0
- Object 8

The following key themes were identified in response to this objective:

- a) Objective should recognise the findings of the NIC and DfT in relation to the Oxford- Cambridge Expressway and other key infrastructure improvements and the contribution that South Oxfordshire could make to delivery of this nationally significant infrastructure.
- b) Object to the Transport Study Final recommendations for transport provision.
- c) Chalgrove site allocation ignores the objective due to its transport issues and constraints.
- d) Support for the Objective. Support objective which requires the delivery of essential infrastructure to support existing residents and services as well as growth. Development of our client's site at Benson supports this.

#### **The Council's summary response to the main themes**

Any essential infrastructure that would be required as a result of the implementation of this Plan has been identified in the Infrastructure Delivery Plan.

The Transport Study evidence base referred to is based upon factual evidence about mitigation required as a result of effects of the Plan; they are not relevant to the Objective.

The infrastructure that would be required as a result of the implementation of Chalgrove in particular has been identified in the Infrastructure Delivery Plan therefore there is no conflict with this Objective. The general aim of each Objective is unlikely to be affected by inclusion of one of the development sites such as Chalgrove.

The support for the objective is noted.

#### **The following changes will be made in response to the consultation:**

None.



## **Objective 5 – Design**

Overall 6 people commented on this objective:

- Support 1
- Comment 0
- Object 5

The following key themes were identified in response to this objective:

- a) Development that respects the scale and character of our towns and villages that enhances the special character of our historic settlements and the surrounding countryside can be over ruled by a Neighbourhood Development Plan (NDP).
- b) Building a town on Chalgrove airfield fails to respect the scale and character of the village, or enhance the special character of our historic settlements and the surrounding countryside. Chalgrove Site allocation ignores this objective.
- c) The Council should work with Thame Town Council to deliver an allocation strategy that recognises the harm that significant allocations can cause community cohesion. The strategy risks turning a thriving, local market town into a clone, commuting town.
- d) Support for the Objective

### **The Council's summary response to the main themes**

Any NDP would need to ensure that it too proposes policies or sites that respect the scale and character of town and villages which will help to achieve this Objective in the Local Plan.

Policy STRAT9 includes specific requirements for Chalgrove development to ensure compliance with this Objective.

The Plan helps to ensure that development in villages like Thame respect the scale and character of town and villages which will help to achieve this Objective. There is a specific policy in the Plan TH1 which supports development proposals that are in accordance with Thame NDP.

The support for the objective is noted.

### **The following changes will be made in response to the consultation:**

None.

## **Objective 6 – Community**

Overall 4 people commented on this objective:

- Support 0
- Comment 0
- Object 4

The following key themes were identified in response to this objective:

- a) Objective 6.1 champions neighbourhood planning. The Chalgrove development site in the Local Plan undermines the NDP which should be allowed to be finalised.
- b) The Council hasn't listened to what locals have said.
- c) Failure to address the loss of Assets of Community Value.

### **The Council's summary response to the main themes**

The Objective is correct in referring to providing support to ensure Neighbourhood Development Plans are deliverable, sustainable and achievable including Chalgrove's NDP. Officers will continue to work with NDP groups to ensure that they can guide development in their area. It is the remit of the local plan to guide development to the most appropriate locations to ensure that wider development needs are met. The needs for housing in particular must be accommodated within the district in accordance with NPPF 2018 2018 Para 11b. The level of development wholly supported by communities is unlikely to meet the needs arising across the district and there is therefore a need for local plans to propose sites to meet the need in the most sustainable locations.

Residents may be frustrated if they object to a development site and the Plan continues to identify it as a site to contribute towards housing, this does not mean that officers have not acknowledged the response and sought to resolve the issues that have been raised.

Paragraph 11.6 of the plan supports the protection, enhancement and creation of community and recreation facilities in towns and villages and the identification of Assets of Community Value.

### **The following changes will be made in response to the consultation:**

None.

## **Objective 7 – Natural and Built Environment**

Overall 5 people commented on this objective:

- Support 1
- Comment 0
- Object 4

The following key themes were identified in response to this objective:

- a) Chalgrove development site fails to protect and enhance the natural environment. Objective 7.2 is undermined by the development site at Chalgrove.
- b) Declaring Green Belt as a natural environment asset is contrary to the five purposes as prescribed in paragraph 80 of the NPPF. The Publication Plan contains no active policy towards improving the character of the Green Belt to provide improved leisure or recreation opportunities, or enhance the landscape, etc. and indeed only recommends removal where it helps with the District's strategic development concerns. There is, therefore, no benefit in including the Green Belt within this Objective.
- c) This objective can be weakened considerably by a NDP.
- d) Support for the Objective. Support the importance given to the Oxford Green Belt for protecting and enhancing the natural environment, including biodiversity and landscape also the description in Objective 7.2 of the Districts rich and varied historic assets and their settings as some of the Districts strongest attributes.

### **The Council's summary response to the main themes**

Chapter 8 of the Local Plan includes a range of policies under the Natural and Historic Environment theme. Policies ENV1 to ENV5 are the policies which would ensure that development sites, including Chalgrove will conform to achieving Objective 7.1. Policies ENV6 to ENV10 are the policies which would ensure that development sites, including Chalgrove will conform to achieving Objective 7.2.

The Government attaches great importance to Green Belts. The inclusion of Green Belt within the Objective is supported by NPPF 2018NPPF 2018 Para 141 which advises that once Green Belt boundaries are established local authorities should plan positively to "...retain and enhance landscapes..." within the Green Belt.

Any NDP would need to ensure that it too proposes policies or sites that conserve and enhance our rich and varied historic assets and their settings which will help to achieve this Objective in the Local Plan.

The support for the objective is noted.

### **The following changes will be made in response to the consultation:**

None

## **Objective 8 – Climate Change**

Overall 3 people commented on this objective:

- Support 0
- Comment 1
- Object 2

The following key themes were identified in response to this objective:

- a) Chalgrove Airfield development does not comply with this objective.
- b) This objective is discredited by the lack of any effective policies to reduce emissions, let alone minimise them.

### **The Council's summary response to the main themes**

Chapter 8 of the Local Plan includes a range of policies under the Natural and Historic Environment theme. Policies ENV1 to ENV5, ENV11, EP1 to EP4 and DES8 to DES10 are the policies which are specifically aimed at ensuring that all development sites, including Chalgrove will conform to achieving Objective 8.2.

The objective is considered to be adequately supported by relevant policies in the Plan. Responding to climate change has been embedded within the National Planning Policy Framework and Building Regulations. Where optional higher standards to respond to climate change have been made available the Plan has sought these higher standards, for example in the water efficiency requirements set out in Policy INF4: Water Resources. The Plan also responds to climate change through Policies DES8 to DES10 and the suite of Environmental Policies ENV1 to ENV5, ENV11 and EP1 to EP4.

### **The following changes will be made in response to the consultation:**

None.

## **Chapter 4: Our Spatial Strategy**

### **STRAT1 – The Overall Strategy**

Overall 194 people commented on this policy:

- Support 24
- Comment 11
- Object 159

The following key themes were identified in response to this policy:

1. Flawed Spatial Strategy;
2. Over Reliance on Strategic Sites;
3. Removal of the Chalgrove Allocation;
4. Duty to Co-operate.

#### **Flawed Spatial Strategy**

- a) The proposed spatial strategy is unsustainable, with the focus on development within the “heart of the district” and within larger villages and market towns a particular cause for concern.
- b) The scale of the proposed development is considered to be entirely incompatible with the obligation to be sustainable.
- c) The plan will urbanise the rural part of the district so that it will no longer be a “beautiful and prosperous” place to live.
- d) The plan should focus on protecting and enhancing the countryside and particularly those areas within the AONBs and Oxford Green Belt by ensuring that outside towns and villages any change relates to specific needs such agriculture or enhancement of the environment.
- e) The strategy should focus development on urban extensions to Oxford and Reading or within developments within commuting distance to those settlements.
- f) The focus on the “heart of the district” overlooks the role of Oxford and omits the significant benefits of locating development on the edge of Oxford. Delivering housing to contribute to Oxford's needs solely in accordance with SODC's own spatial strategy is unsound as it takes no account of the relationship of those sites with Oxford.
- g) All sustainable settlements should grow with development being proportional to the facilities, services and infrastructure on offer, together with their functional links to higher order service centres and neighbouring settlements, in order to help to sustain existing facilities and services.
- h) Exceptional circumstances for Strategic level Green Belt release has not been demonstrated.

#### **Over Reliance on Strategic Sites**

- i) There is a lack of infrastructure, particularly regarding the capacity of the existing highway network to support strategic sites delivering most of the housing within the district.
- j) The strategic sites do not represent viable developments; a review of the various studies is required to ensure that the impact of the proposals is known and that they are viable.
- k) The focus on strategic sites does not allow sufficient flexibility in the land supply will make the plan undeliverable over the plan period. A supply of smaller, unconstrained sites that can be delivered quickly alongside the major strategic

sites should be identified. Land east of Park Road, was promoted as a suitable alternative source of supply.

### **Removal of the Chalgrove Allocation**

- l) Opposition to the allocation at Chalgrove.
- m) The allocation of Chalgrove undermines the Neighbourhood Plan process, is out of character with the rural nature of the area, lacks supporting infrastructure and is not a viable or deliverable option in view of the existing lease on site.

### **Insufficient Cross Boundary Working to Discharge the Duty to Co-operate**

- n) Cross boundary working with Buckinghamshire is required regarding the planned development.
- o) The plan does not present a reasonable approach to providing for identified Oxford City housing shortages. There is a need to show explicitly which sites are proposed to address the unmet need.
- p) In assessing and allocating sites to specifically meet Oxford's unmet need, there must be clear consideration of the spatial relationship between the city and district and the most sustainable travel links to Oxford.
- q) The plan ignores the work undertaken to support the Oxfordshire Growth Deal. By not accepting the apportionment and consideration of the joint Growth Board evidence base upon which the Growth Board is progressing its strategic working and which all of the councils have been party to, the plan could be proceeding on unsound grounds.
- r) Oxford's housing need should not be met at all, the district has trouble enough finding sites for its own housing need.

In addition to the main themes the following comments were also submitted in response to Policy Strat 1:

- s) STRAT 1 does not contribute towards achieving objectives 1, 3, 4, 5, 6, 7 and 8.
- t) Housing numbers should not be determined until the route of the Oxford to Cambridge Expressway is finalised.
- u) Housing numbers should be revisited. The assessment of both quantity and quality is flawed.
- v) A robust assessment of the timing and rate of housing delivery from all the Strategic Site Allocations should be undertaken and set out in a housing trajectory.
- w) Reliance on Neighbourhood Plans to allocate housing numbers is flawed and unsound.
- x) Biodiversity needs to be planned for at a landscape scale. In-depth study of where contiguous land could be made available and enhanced for nature is necessary.
- y) The policy makes no reference to the importance of sustainable development, the need to make provision for resilience to climate change and the importance of conserving resources.
- z) The settlement hierarchy in Policy STRAT1 should be revised to clarify how developments within the AONB and its setting would be treated differently to developments in any other areas of the district.
- aa) How many representations were ignored/lost?

### **Support**

- bb) The SODC Local Plan puts forward Chalgrove, Culham and Berinsfield as Strategic Development Sites. These sites are all more sustainable than Wick Farm

and Lower Elsfeld and have the potential for better transport and communications links.

- cc) The strategic sites proposed will not affect the precious Green Belt around Oxford which protects local villages and communities from being subsumed by Oxford City.
- dd) Support the general thrust of the overall strategy which seeks to provide for growth at the larger towns such as Henley, thus helping to sustain local services and facilities whilst also providing for sustainable patterns of growth.
- ee) Support overall, especially the growth planned in Wallingford.

### **Defence Infrastructure Organisation**

Tall structures should not cause an obstruction to air traffic movements nor compromise the operation of air navigational facilities. The MOD statutory height safeguarding zone for the district of South Oxfordshire is for RAF Benson.

### **Historic England**

Historic England welcomes the indication in paragraph 4.9 that the Council's preferred Spatial Strategy will maintain the built, historic and natural environment as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.

### **Homes England (formerly the Homes and Communities Agency)**

Support the plan and the inclusion of Chalgrove.

### **North Wessex Downs AONB**

Support the proposed modifications

### **Oxford Bus Company**

The smaller developments at remote sites should be discouraged if they are not on the public transport network. The Plan therefore needs to concentrate on smaller sites nearer to Oxford to meet the unmet need.

### **Sports England**

First bullet point should add "and improving health, increasing well being and building stronger communities".

### **UK Atomic Energy Authority**

The UKAEA supports the Council's "preferred strategy" as set out at paragraph 4.9 and in Policy STRAT1 -The Overall Strategy. It also lends its strong support to the policy of "focusing major new development in Science Vale", including at Culham.

### **Cherwell District Council, Oxford City Council and West Oxfordshire District Council (Joint Response)**

In helping to meet Oxford's unmet housing needs, the sites should be located close to Oxford. Specific sites should be identified to meet the need. Chalgrove is the least appropriate to help meet this need. The Growth Board options have been disregarded. The Plan fails to take account of Oxford City's affordable housing issues. The supply of sites identified in the Plan seeks only to address the strategy to strengthen the existing settlement hierarchy within South Oxfordshire. More

consideration should be given to Green Belt sites around the edge of Oxford. The Plan is unsound because it has not fully considered all reasonable alternatives, and is contrary to the NPPF.

### **Reading Borough Council**

It is recognised that the Local Plan does not propose significant housing growth on the boundaries of Reading, and that the sites promoted through the Strategic Housing Land Availability Assessment around Reading have not been taken forward. Reading Borough Council agrees with this position. Partly this is because of the rural nature of the areas close to this part of the boundary along with the close proximity of the Chilterns Area of Outstanding Natural Beauty. However, the transport and other infrastructure constraints in the northern part of the Borough have long been seen as a significant constraint to significant new development north of the River Thames.

### **Oxfordshire County Council**

There may be a need for other site allocations close to Oxford. Apart from the redevelopment of Wheatley Oxford Brookes for 300 houses, the sites proposed are not particularly close or convenient to Oxford. The Oxfordshire Growth Board in its strategic spatial options analysis assessed sites at Grenoble Road, Wick Farm and Thornhill as potentially suitable for addressing Oxford's unmet need. The County Council itself has put forward a landholding at Guydens Farm on the B480 and Oxford Road close to the Eastern Bypass and Grenoble Road, and is seeking that land in that area be allocated. Planning for Oxford's unmet need should not be done in isolation of the spatial implications of the housing number. The spatial strategy fails to recognise the implications of providing for the significant number of people who will need to commute into Oxford.

### **Clifton Hampden and Burcot Parish Council**

There is conflict in the overall policy. On the one hand the policy STRAT 1 aims to focus development at Didcot and Culham; yet Culham is in the Green Belt which conflicts with other statements in STRAT 1 to protect and enhance the countryside, in particular the Green Belt. The Plan should be clearer about the hierarchy between these strategic allocations in order for local people to be certain about their surroundings.

### **Great Haseley Parish Council**

Many policies depend upon infrastructure being provided by others Highways, schools, public transport, medical facilities etc. but the District Council has no powers to ensure that these happen in a timely manner. The reliance on strategic sites brings this problem into sharp focus as failure to get the necessary infrastructure in place will effectively remove these sites from the Plan and could mean that the District finds itself without a five year land supply again.

### **Kidmore End Parish Council**

Overall strategy we approve the protecting and enhancing of the countryside and AONB. We are unsure of how you are using the word.

### **Thame Town Council**

The Plan has not been positively prepared. Sites in the most recent (October 2017) SHELAA for the Thame area show Land has therefore been declared suitable for



either 823 homes or for 266,800 sq m of employment floorspace. Other sites have been rejected because of availability or suitability concerns. This work has, however, been undertaken without the above available and suitable sites being included within the Districts landscape evidence document, (Landscape Capacity Assessment for Sites on the Edge of Didcot, Henley, Thame and Wallingford in South Oxfordshire, September 2017). Other sites in Thame were included within this report, written by landscape consultants. The reason given for their absence from this report was that it had been based on the 2013 SHLAA, and many sites were not within that document. It does seem that conclusions on the capacity of the above sites, and the unsuitability of others, have been drawn up separately from this key document. This is indicative of evidence being created to align with a pre-determined strategy rather than a strategy being formed as a result of sound evidence and public consultation.

### **Watlington Neighbourhood Plan Community Forum**

The policy makes no reference to the importance of sustainable development, the need to make provision for resilience to climate change and the importance of conserving resources. These issues are only covered in the policies for Design towards the end of the Plan.

## **The Council's summary response to the main themes**

### **Flawed Spatial Strategy**

There is sound evidence which supports the approach to meeting South Oxfordshire's housing needs, and the sites allocated are considered deliverable and achievable.

The Local Plan sought to build upon the existing settlement hierarchy and actively created a pattern of development central to the area. It identified strategic levels of growth at four locations connecting through the central area of the District at Berinsfield, Chalgrove, Culham and Wheatley. These allocations are subject to change in the revised Local Plan.

In addition, the scale of housing development required to meet the growth envisaged by the Oxfordshire Housing and Growth Deal has now been quantified in Oxford City Council's Publication Local Plan (November 2018). In seeking to address this need and in response to the consultation, the revised Plan now proposes a number of residential led strategic allocations, adjacent to Oxford, to contribute towards meeting Oxfordshire's growth.

### **Reliance on Strategic Sites**

It is recognised that strategic sites can be challenging to prepare for development and serve with appropriate infrastructure. The approach of meeting housing need through strategic sites is supported by national planning policy which states that, "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." (NPPF 2018, Para 72,). This challenge will be engaged with and reflected in our Infrastructure Delivery Plan (IDP) and this plan's supporting development trajectory which recognises the long lead in times associated with these sites.

### **Removal of the Chalgrove Allocation**

The Chalgrove site is intended to support and enhance the current function of Chalgrove, which the Plan has identified as a large village in a sustainable location (a key part of delivering the spatial strategy). Officers will continue to work with Homes England (formerly the Homes and Communities Agency) to establish whether the Chalgrove Airfield development will be deliverable over the plan period. The Infrastructure Delivery Plan will ensure that the infrastructure required to support the allocation can be delivered in a timely manner.

### **Duty to Co-operate**

All allocations made in the core strategy are retained and new allocations are made to meet additional housing requirements identified in the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014. The strategy has been updated to help address the key challenges facing the district now and to make best use of available opportunities.

In response of the consultation comments, the Plan has made further provision for sites adjacent to Oxford to help meet the level of development anticipated by the Oxfordshire Housing and Growth Deal.

Officers have worked constructively with all prescribed bodies to prepare the Plan under the duty to co-operate.

### **Further Responses to comments made**

- It is considered that STRAT 1 contributes to meeting Objectives 1, 2, 3, 4, 6 & 7 of the plan.
- Planning law requires local planning authorities to prepare, and keep up to date, development plans for their areas to facilitate the operation of a plan led system. National policy requires that a development plan be based on an assessment of the need for housing at the time the plan is prepared. It is not possible for plan preparation to be put on hold pending a decision on the planned Oxford to Cambridge Expressway, to do so would leave the district without an up-to-date development plan.
- The starting point for the assessment of housing numbers is now prescribed by the NPPF through its standard method. The government's adjustment of the methodology set out in the national planning practice guidance is subject to a consultation which closed on 7<sup>th</sup> December 2018; the outcome is pending. The Housing and Growth Deal commitments and the Oxfordshire SHMA are considered to constitute a sound justification for uplifting South Oxfordshire's housing requirement above the 556 homes per year from the standard method. Taken together, the evidence indicates a housing requirement for South Oxfordshire of 775 homes a year over the plan period.
- An updated housing trajectory will accompany the revised Local Plan, this may be again subject to update for the submission of the Plan.
- The Council strongly supports the Neighbourhood Planning process which is compliant with Para 183 of the NPPF1. As per Objective 6.1, the Council will "Champion neighbourhood planning, empowering local communities to direct development within their area and provide support to ensure Neighbourhood Development Plans are deliverable, achievable and sustainable". The Plan's

proposed devolution to neighbourhood Development Plans is an innovative approach which is now fully supported by NPPF 2018 Paras 65 and 66. Relevant policies are included in the plan that will operate as a contingency if a neighbourhood Development Plan cannot, or will not, allocate the required level of development for housing or employment.

- It is considered that Policies ENV2 and ENV3 of the plan will work together to ensure that the network of sites that comprise the local ecological network are conserved and enhanced.
- Responding to climate change has been embedded within the National Planning Policy Framework and Building Regulations. Where optional higher standards to respond to climate change have been made available to the Council, the Plan has sought these higher standards, for example in the water efficiency requirements set out in Policy INF4: Water Resources. The Plan also responds to climate change through Policies DES8 to DES10 and the suite of Environmental Policies ENV1 to ENV5, ENV11 and EP1 to EP4.
- It is considered that Policy ENV1: Landscape and Countryside provides a suitable guide to development within the AONB but the revised plan updates this policy to take into account changes made by NPPF 2018.
- The Council has set out a response to the issues raised with the consultation methods under the response to the Process.

**The following changes will be made in response to the consultation:**

The policy has been amended to include a commitment to meeting the unmet housing needs of Oxford City on strategic allocations adjacent to the boundary of Oxford near to where that need arises. Additional allocations are proposed South of Grenoble Road, North of Bayswater Brook and at Northfield on the periphery of Oxford, to help meet the development needs anticipated by the Oxfordshire Housing and Growth Deal.

Policy ENV1 Landscape and Countryside will be updated in accordance with NPPF 2018.

## **Policy STRAT2 – The Need for New Development in South Oxfordshire**

Overall 134 people commented on this policy:

- Support 7
- Comment 9
- Object 118

The following key themes were identified in response to this policy:

1. The Oxfordshire Strategic Housing Market Assessment (SHMA) 2014;
2. Proposed housing target;
3. Housing land supply;
4. Employment land supply.

### **The Oxfordshire Strategic Housing Market Assessment (SHMA) 2014:**

- a) The SHMA is now out of date and does not match the plan period.
- b) The assessment of housing needs is incorrect and the approach is flawed, particularly since it is based on interim projections.
- c) Assumptions relating to economic growth used in the SHMA are overly optimistic leading to the housing need being overestimated.
- d) The SHMA underestimates need for particular groups.

### **Proposed Housing Target**

- e) The minimum target of 17,050 dwellings should be used.
- f) The midpoint does not plan to meet the district's full housing needs.
- g) The amount of employment land proposed has increased from the Second Preferred Options to the Publication Version Local Plan, but the amount of housing proposed has stayed the same. Housing growth should be increased to ensure a balance. The upper limit of the range (825 dwellings) should be used to complement the employment land approach and/or to help address the affordability issues in the district. No constraints had been identified through the Strategic Housing and Employment Land Availability Assessment or Sustainability Appraisal that mean this could not be achieved.
- h) A policy-off approach should be taken in determining where in the SHMA range South Oxfordshire's Objectively Assessed Need for housing should fall.
- i) The target should be increased to 965 dwellings per year to meet full affordable housing needs.
- j) The amount of housing proposed would harm the rural character of the district. The constraint of the AONB should be taken consideration in determining the number of houses to plan for.
- k) There is insufficient infrastructure to support the quantity of housing proposed.
- l) The new housing assessment methodology that was consulted on in September 2017, suggests South Oxfordshire's housing needs would be lower than those proposed by the plan.

### **Housing Land Supply**

- m) The level of housing proposed by the Plan far exceeds the level of need.
- n) The strategy is over reliant on strategic sites.
- o) The plan needs to take account of developments with existing planning permission and make contingencies should be made for past under delivery and non-implementation of permissions.

- p) The housing trajectory and five-year supply position on adoption of the Plan is unclear and more detail should be provided.

### **Employment land supply**

- q) Uncertainty regarding the likelihood of delivery of the employment land proposed by the plan given reliance on NDPs to allocate part of the supply.
- r) The amount of employment land allocated should be increased to take account of losses of Class B floorspace in recent years.
- s) South Oxfordshire's housing needs and Oxford's unmet housing need should be dealt with within the same policy.

### **Comments made by specific consultation bodies**

#### **Oxfordshire County Council**

No concerns raised in relation to the meeting of South Oxfordshire's own housing needs.

#### **Wokingham Borough Council**

Support SODC's commitment to plan for its own housing needs in full. Consider the plan to be sound as regards the provision of housing.

#### **Chalgrove Parish Council**

The proposed housing supply is in excess of the numbers needed. This oversupply is likely to increase when the new methodology is introduced.

#### **Culham Parish Council**

The SHMA is out of date. The new methodology indicates that fewer homes are needed.

#### **East Hendred Parish Council**

The SHMA is out of date.

#### **Great Haseley Parish Council**

The proposed housing supply is in excess of the numbers needed. This oversupply is likely to increase when the new methodology is introduced.

#### **Harpsden Parish Council**

The SHMA is flawed. The proposed housing supply is in excess of the numbers needed. This oversupply is likely to increase when the new methodology is introduced.

#### **Sonning Common Parish Council**

The SHMA is flawed. The forecasts are excessive, unachievable and will cause significant and unnecessary harm to the rural character of the district. They are based upon predictions of economic growth which are over-optimistic to the point of being unreal. The new methodology provides a more realistic assessment of housing need.

### **The Council's summary response to the main themes**

The Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) provides a consistent assessment of housing need across the Oxfordshire housing market area (HMA). All authorities within the Oxfordshire Housing Market Area have committed to the Oxfordshire Housing and Growth Deal, which was in turn informed by the 2014 SHMA. Adjoining local plans in Oxfordshire are currently at various stages of responding to the SHMA findings in their local plans or the government's standard method. The SHMA is the only document that provides an evidenced approach to the 100,000 homes identified in the Oxfordshire Housing and Growth Deal and is also the only document that seeks to split the 100,000 home target between each of the constituent authorities. Other authorities have responded to that commitment in their Local Plans.

The starting point for the assessment of housing numbers is now prescribed by the NPPF which gives a standard methodology. The government's adjustment of the methodology set out in the national planning practice guidance is subject to a consultation which closed on 7th December 2018; the outcome is pending. Using the standard method for South Oxfordshire results in an annual housing need of 556 homes a year using the current standard methodology. This figure represents the minimum annual housing need for South Oxfordshire, which is considered as the starting point before any uplifts are applied.

### **South Oxfordshire's Housing Requirement**

While the SHMA forms an important part of the Local Plan evidence base, it does not set the Local Plan housing requirement. A policy-off approach is taken in the SHMA to identify Oxfordshire's objectively assessed housing need. The SHMA expresses South Oxfordshire's OAN as a range (725-825 dwellings per year). The housing requirement within this range is then determined through the local plan process, taking into consideration national policy and guidance, the spatial strategy, market capacity and deliverability, infrastructure, land availability, environmental constraints and other evidence.

Using the midpoint of South Oxfordshire's objectively assessed need (OAN) identified through the SHMA 2014 (775 dwellings per year) aligns South Oxfordshire's planned housing growth with the other district authorities within Oxfordshire and provides a common approach to the needs set out in the SHMA. This is considered to be an appropriate response to meeting the district's housing needs. Not only does this go beyond the committed economic growth housing requirement for South Oxfordshire, but also provides an uplift to deliver affordable housing identified in the Oxfordshire Strategic Housing Market Assessment (SHMA).

It is considered that the Housing and Growth Deal commitments and the Oxfordshire SHMA together provide a sound justification for uplifting South Oxfordshire's housing requirement above the current 556 homes per year derived from the standard method for calculating housing need. Taken together, the evidence indicates a housing requirement for South Oxfordshire of 775 homes a year between 2011 and 2034. The approach to deriving the housing target is explained further in the Housing Topic Paper.

While the midpoint of the OAN for housing is being planned for, the higher end of the range of anticipated employment land requirements is being met. The 2014 SHMA forecasts anticipated economic growth of 11,455 jobs in South Oxfordshire from 2011 to 2031. The 2017 'South Oxfordshire Employment Land Review Addendum' (SOELRA) examined the forecasts of the 2014 SHMA. Based on the growth anticipated by the SHMA, the SOELRA projects a requirement of 33.2 to 35.9 hectares of additional employment land to 2033. The revised Plan has extrapolated this requirement to encompass the extended plan period to 2034 so that a total of between 34.7 and 37.5 hectares of employment land is expected to be required over the period 2011 to 2034.

The 2016 Strategic Economic Plan (SEP) published by the Oxfordshire Local Enterprise Partnership in 2016 sets out an ambition for accelerated economic growth for Oxfordshire, as recognised by the commitment to the Oxfordshire Housing and Growth Deal. In addition, Oxfordshire is developing a Local Industrial Strategy which outlines how Oxfordshire will support the achievement of the national Industrial Strategy. The Plan proposes making sufficient land available to meet the requirements anticipated at the higher range of the economic forecasts in recognition of the SEP and emerging LIS as this is considered to be an appropriate response to anticipated growth within Science Vale over the plan period.

### **Housing and Employment Land Supply**

The Council considers the issues raised in relation to housing and employment land supply under policies EMP1: The amount and distribution of new B-class employment land and H1 Delivering New Homes.

### **The Relationship between South Oxfordshire's Housing Requirement and Oxford City's Unmet Need**

There is a clear relationship between South Oxfordshire's housing requirement and the uplift to housing need that is intended to help meet Oxford City's unmet need. There are, however, differences in the time periods for meeting those needs. In response to the consultation, specific allocations have now been proposed to help meet the need generated by the growth of Oxford in response to the Oxfordshire Housing and Growth Deal. Accordingly, the Plan has been amended to set out all development need requirements under a single policy, Policy STRAT2. In recognition of the preparation time required for delivery of development within sites the contribution to meet Oxford's needs will be applied from 2024/25 onwards because this is the earliest date that these sites would be capable of making a contribution to the housing supply given their long lead in times and infrastructure requirements.

### **The following changes will be made in response to the consultation:**

Policy STRAT 3 will be deleted and Policy STRAT 2 will be amended to encompass all development requirements required over the plan period.

## **STRAT3 – The unmet housing requirements from Oxford City**

Overall 139 people commented on this policy:

- Support 9
- Comment 8
- Object 121

The following key themes were identified in response to this policy:

- a) The full Oxfordshire Growth Board apportionment (4,950 dwellings) should be planned for:
  - To plan for a lower number is inconsistent with the approach taken by the other Oxfordshire districts. The council did not sign the Memorandum of Cooperation. The duty to cooperate is not being met.
  - Planning to provide 3,750 homes creates a shortfall of 1,200 dwellings. It is unclear how this will be dealt with. The full needs of the Oxfordshire HMA will not be met.
  - Insufficient justification is provided for not planning to meet the full apportionment.
- b) Sites close to and well connected to Oxford should be allocated. Insufficient justification is provided for not taking alternative sites forward. Alternative sites represent more sustainable options than the proposed allocations. Specific sites should be identified to meet Oxford's unmet need.
- c) Meeting Oxford's unmet need should not be delayed until 2021. Oxford City's unmet need should be addressed now, not through a partial review. A partial review may not be appropriate with work commencing on the Joint Strategic Spatial Plan. No mechanism is proposed for monitoring Oxford's unmet need.
- d) The SHMA covers the period to 2031. South Oxfordshire housing needs have been rolled forward to 2033. The same should be done for Oxford's unmet need.
- e) South Oxfordshire should not be planning for Oxford City's unmet housing need:
- f) The SHMA is out of date/incorrect.
- g) Oxford City has not adopted its new Local Plan. It is not possible to plan for Oxford's unmet need until it has been properly assessed.
- h) There is no evidence that any homes are needed to help meet Oxford's unmet need. The Plan will result in the oversupply of housing.
- i) Unmet housing need is likely to reduce with the new methodology for calculating housing need.
- j) Oxford City should meet its own housing needs. Oxford City should be increasing densities and planning for housing, not employment.
- k) It is unclear how Oxford's unmet affordable housing needs will be addressed.
- l) Some support for the policy approach. Support for cross-boundary working.

### **Aylesbury Vale District Council**

Welcome and support meeting the OAN for Oxfordshire within the Oxfordshire HMA. Request continued communication as the Oxfordshire unmet need situation becomes clearer.

### **Cherwell District Council, Oxford City Council and West Oxfordshire District Council (Joint Response)**



The full Growth Board apportionment should be planned for. Insufficient justification is provided for not meeting the full apportionment. Not providing for the full apportionment is increasing pressure on the other Oxfordshire districts. SODC has not discharged the duty to cooperate. Specific sites should be identified to provide for Oxford's unmet need. Clarity is needed in terms of how affordable housing need will be met. The level of Oxford's unmet planned for should be increased to cover the period to 2033.

#### **Oxfordshire Country Council**

The full Growth Board apportionment should be planned for. This could be accommodated within the level of housing supply that is already provided within the Plan. Further consideration should be given to allocating sites close to Oxford. South Oxfordshire's approach is inconsistent with that taken by the other authorities in Oxfordshire. A commitment should be made to work jointly with Oxford City to put in place arrangements for allocating affordable housing to those on the Oxford City housing register.

#### **Oxfordshire County Council (Property and Facilities)**

The Growth Board apportionment should be planned for by allocating sites in sustainable locations. The policy fails to accord with the duty to cooperate.

#### **Reading Borough Council**

Not in a position to comment on whether the level of Oxford's unmet need to be provided is appropriate, although it is vital that the local plans for the Oxfordshire HMA in combination meet those needs to avoid placing pressure on other areas such as Reading.

#### **Wycombe District Council**

No objections to SODC's plan and does not propose to take a position on how the Oxfordshire Councils will meet the OAN for Oxfordshire across the Oxfordshire Housing Market Area. However Wycombe District Council is concerned that there is not a unanimously agreed approach across the Oxfordshire Councils for dealing with unmet need across their HMA. This may have as yet unforeseen implications for Councils outside the Oxfordshire HMA.

#### **Beckley & Stowood Parish Council**

Oxford City should be doing more to meet its own housing needs.

#### **Binfield Heath Parish Council**

No unmet need should be planned for until an accurate assessment has been undertaken.

#### **Chalgrove Parish Council**

When planning to help meet Oxford's unmet need, sites closer to the city should have been allocated.

#### **Culham Parish Council**

Oxford City's unmet need is unknown. It is unsound to plan to meet it.

**East Hendred Parish Council**

The proposed contribution of 3,750 dwellings to meet Oxford City's unmet housing need is not supported by the adjoining Districts. This is contrary to the Duty to Co-operate with adjoining Authorities.

**Ewelme Parish Council**

Oxford City should meet its own housing needs and not look to other districts.

**Great Haseley Parish Council**

The housing numbers are significantly in excess of the number required to meet the unmet need of Oxford City. Housing, particularly affordable housing, should be located within easy reach of Oxford City and its employment opportunities

**Harpsden Parish Council**

There is no evidence that any houses are needed to meet Oxford's unmet need. No evidence has been provided by Oxford City Council. The new OAN methodology will mean that fewer homes are need and Oxford City will be able to meet its own needs.

**Kidmore End Parish Council**

Sites close to Oxford with good public transport links should be identified to help meet Oxford's unmet need.

**Thame Town Council**

Specific sites close to Oxford should be identified to help meet Oxford's unmet need. The duty to cooperate is not being met.

**The Council's summary response to the main themes**

The unmet housing needs of Oxford were provided for proactively by the Plan until a specific requirement could be evidenced. The South Oxfordshire Plan could not pre-determine the extent of Oxford's growth constraints. The publication of the Oxford City Proposed Submission Local Plan during November 2018 now quantifies the extent of residential development required to meet the targets set out in the Oxfordshire Housing and Growth Deal. The Plan now proposes strategic allocations adjacent to Oxford to help meet those needs. A contribution of 4,950 dwellings is now proposed from 2024/25 to 2033/34 to help meet Oxford's housing needs. Some of these sites will continue to deliver further dwellings following the end of the Plan period. In response to the consultation the strategy has been revised and sites have been selected in accordance with the revised spatial strategy, informed by the sustainability appraisal process. To meet the contribution to Oxford's needs additional strategic sites are proposed by the Plan at Grenoble Road, North of Bayswater Brook and Northfield on the periphery of Oxford.

Policy STRAT 3 will be deleted and Policy STRAT 2 will be amended to include a commitment to meeting the unmet housing needs of Oxford City on strategic allocations adjacent to the boundary of Oxford near to where development need arises.

Officers note the support for the policy approach of assisting the growth of Oxford and for continued cross-boundary working.

**The following changes will be made in response to the consultation:**

- Policy STRAT 3 will be deleted from the Plan.
- Policy STRAT 2 will be amended to include a commitment to meeting the unmet housing needs of Oxford City with a contribution of 4,950 dwellings proposed over the plan period from 2024/25.
- Additional allocations will be proposed South of Grenoble Road, North of Bayswater Brook and at Northfield on the periphery of Oxford, to help meet the development needs anticipated by the Oxfordshire Housing and Growth Deal.

## **STRAT4: Didcot Garden Town**

Overall 24 people commented on this policy:

- Support 5
- Comment 6
- Object 13

The following key themes were identified in response to this policy:

- a) The proposed masterplan boundary contained within Appendix 6 should be altered.
- b) Policy wording should be expanded in order to specifically support the Garden Town objectives (such as housing and job targets within South Oxfordshire and the prevention of coalescence)
- c) A Supplementary Planning Document is not appropriate. Garden Town policies and allocations of land should be contained in a Local Plan Development Document.
- d) The Garden Town Masterplan is unduly influencing the Council in what should be plan-led decisions through their Local Plan about the best locations for housing growth.

### **Oxfordshire County council**

Amendments should be made to paragraph 4.33 which sets out a strategic approach for Science Vale as set out in the box below. The amendments are needed as the text is currently not clear, for example it suggests a 'cycle strategy' which may or may not be referring to the Science Vale Cycle Strategy or the Active and Healthy Travel Strategy which are available on our website as part of Local Transport Plan 4.

The following text changes to paragraph 4.33 are required to clarify the strategy for Science Vale:

“...A "step change" in travel choices away from car travel towards public transport, cycling and walking with Didcot at the heart of a fully connected Science Vale.

~~Didcot's role as a major rail interchange strengthened, including aspirations for rail services direct from Grove and Wantage.~~

Didcot Parkway Railway Station and its role as a major rail interchange improved.

Culham railway station to be improved and transformed into a focal point for the new community

A new railway station at Grove in the longer term

Improvements to capacity of the rail lines

~~A cycle strategy for Science Vale that enables people to reliably travel between their homes and their jobs by means other than the private car linking Didcot with the key employment centres at Culham Science Centre, Milton Park and Harwell~~

Convenient bus services throughout the area

More and better cycling and walking links to encourage reliable, active and healthy travel”

### **Historic England.**

Would welcome the opportunity to be involved in the masterplanning and SPD.

**The Council's summary response to the main themes**

The Garden Town masterplan, as part of the delivery plan, has been developed independently alongside production of the local plan.

The principle of allocating development at this location will be tested through the local plan process. The detail of the masterplan and delivery requirements will be established through a review of the local plan.

The sustainability appraisal supports the spatial distribution of development within the district. Drawing on a combined approach to the distribution of new housing development enables a series of benefits to be delivered through the Local Plan. Development at Didcot Garden Town supports the delivery of the spatial strategy as it is located in the heart of the Science Vale area and in a sustainable settlement.

The changes to Para 4.33 suggested by Oxfordshire County Council will be integrated into the Plan subject to a positive Sustainability Appraisal.

**The following changes will be made in response to the consultation:**

The changes to Para 4.33 suggested by Oxfordshire County Council will be integrated into the supporting text of the revised Plan subject to a positive Sustainability Appraisal.

## **STRAT5: Strategic Development**

Overall 159 people commented on this policy:

- Support 5
- Comment 12
- Object 142

The following key themes were identified in response to this policy:

- a) There are no exceptional circumstances for the release of the Strategic Allocations from the Green Belt.
- b) The Strategic Allocations do not meet the Duty to Cooperate as they will not provide houses that are appropriately close to Oxford.
- c) The plan places an overreliance on strategic sites which raises concerns they cannot be delivered and are unsustainable.
- d) There is a disproportionate amount of development to be directed towards new settlements when the District contains existing sustainable market towns.
- e) Strategy cannot be implemented as necessary supporting infrastructure cannot be provided. Infrastructure improvements are not known.

### **Sports England**

Support this policy but have a concern over point xvii) leisure facilities and playing pitches as outlined in the Council's Leisure Strategy. The expression leisure facilities tend to give the impression of informal pastimes, where formal sport does have an import role to play in local communities. Therefore, suggest the following change of wording to point xvii) SPORT AND leisure facilities and playing pitches as outlined in the Council's Leisure Strategy.

The plan does not contain a great deal on well being and health, this policy is the only reference directly to health impact. Major planning applications will need to be accompanied by a Health Impact Assessment. The applicant will also be required to submit supporting information to demonstrate how the development positively contributes to health and wellbeing and the 10 principles of Active Design checklist developed Sport England and supported by Public Health England.

### **Historic England**

Would prefer Policy STRAT5 to make it explicit that the masterplan should be informed by these studies and that it should be demonstrated how it has been. In addition, it would be clearer if Policy STRAT5 made it explicit that its requirements relate to development proposals for STRAT6 to STRAT10.

### **Homes England (formerly the Homes and Communities Agency)**

The HCA notes the amended wording of the policy to reflect the requirements of each strategic allocations, and agrees to this approach. However, it considers that the link between STRAT5 and the strategic allocations should be made clearer in order to ensure consistency with wider objectives of the plan. The proposals for Chalgrove Airfield have been prepared to ensure that the requirements of STRAT 5 (as well as STRAT 1, 2, 3, 4 and 9) are delivered in full.

### **Environment Agency**

For point xvi we recommend for the purposes of clarity and accuracy the following wording, “an integrated water management plan to include proposed foul and surface water drainage strategies.”

### **Highways England**

Highways England is supportive of sustainable travel options in the area as these will help limit any impacts on the local and strategic road networks.

### **Education and Skills Funding Agency**

Modification requested - "developers must engage with relevant infrastructure providers to ensure the timely implementation of the Infrastructure Delivery Plan.

### **The Council's summary response to the main themes**

Exceptional circumstances for Green Belt release are provided within the Local Plan within each individual STRAT allocation policy. It was also considered within the site selection background paper when reassessing the plans strategic allocations.

Policy STRAT5 sets out the Council's strategy for development aimed at strengthening the heart of the district. In response to the consultation responses and the quantification of Oxford's unmet housing needs, officers have revised the spatial strategy to make further provision for development adjacent to Oxford. The need arising within South Oxfordshire will be met by continuing with the strategy of focusing growth within the heart of the district.

It is acknowledged that strategic sites can be challenging to prepare for development and serve with appropriate infrastructure. The approach of meeting housing need through strategic sites is supported by national planning policy which states that, “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.” (NPPF 2018, Para 72). This challenge will be engaged with and reflected in our Infrastructure Delivery Plan (IDP) and this plan's supporting development trajectory. In addition, criteria based policies for each strategic allocation has been included which will provide for further evidence base to be submitted via the application process to ensure that the sites can be delivered with all required supporting infrastructure.

The plan supports a range of development opportunities at different scales and types of settlements and sites within the towns and larger villages.

The necessary infrastructure to support the proposals within the Plan are included within relevant policies. The detailed infrastructure requirements are set out within the Infrastructure Delivery Plan.

### **The following changes will be made in response to the consultation:**

Amendment to Clause xvi) to include proposed foul and surface water drainage strategies.

### **STRAT6: Culham Science Centre**

Overall 36 people commented on this policy:

- Support 4
- Comment 4
- Object 28

The following key themes were identified in response to this policy:

- a) No exceptional circumstances for removal from the Green Belt.
- b) No evidence of need as this is not a major employment site.
- c) Infrastructure cannot support growth.

### **Oxfordshire County Council**

Strategic policies should be modified to clarify exactly which sites will help to address Oxford's unmet need.

References to contributions to the new Thames crossing between Culham and Didcot and the Clifton Hampden bypass which are made in STRAT7 should be added to STRAT6 if a viable contribution can be made.

### **UK Atomic Energy Authority**

The reference to unacceptable visual impacts is not justified. Paragraph 4.44 - A further exceptional circumstance could be added. The Green Belt "inset plan" on page 214 of the Plan (Appendix 4) should be amended to include the entirety of the CSC, including the frontal area of the site as shown on the plan attached at Appendix A to this submission. The omission of this area is illogical and is not "justified" in NPPF paragraph 182 terms.

### **Historic England**

Policy STRAT6 or its supporting text should require a more detailed evaluation of the buildings at the Culham Science Centre to be undertaken to ascertain their significance prior to redevelopment taking place, the proposals for redevelopment to be informed by that assessment and the deposition of that assessment in a public archive. Without it, Historic England considers that Policy STRAT6 fails to provide adequate protection for the historically significant buildings on the site.

### **The Council's summary response to the main themes**

The exceptional circumstances justifying a review of the Green Belt in this area are set out in Para 4.44 of the plan. Where the criteria within this paragraph do not constitute exceptional circumstances these will be removed.

The policy is supported by a robust evidence base. The Employment Land Review 2015 supports the allocation of "a substantial amount of floorspace at Culham Science centre (CSC) The proposed site is home to the Culham Centre for Fusion Energy (CCFE) and is the site of the Joint European Torus (JET), Mega Ampere Spherical Tokamak (MAST) and the now closed Small Tight Aspect Ratio Tokamak (START). The Local Plan 2011 identified the importance of CSC for its contribution to employment and research. The adopted Core Strategy built on the saved Local Plan policies further recognising the importance of CSC in policy CSEM3. CSC is part



of Science Vale and is considered to be important for the economic prosperity of the district.

The requirements are fully supported by evidence within the Infrastructure Delivery. The policy makes provision for the infrastructure required to support the development.

The plan must be considered as a whole and relevant policies for the preservation of heritage assets are considered to provide sufficient guidance for the protection of the historically significant buildings within the proposed allocation.

**The following changes will be made in response to the consultation:**

- Bullet points 1, 3 and 5 will be removed from Para 4.44 as they do not constitute exceptional circumstances.
- The policy will include a requirement for a pedestrian/cycle bridge across the River Thames to link with Abingdon.

## **STRAT7: Land adjacent to Culham Science Centre**

Overall 245 people commented on this policy:

- Support 9
- Comment 12
- Object 226

The following key themes were identified in response to this policy:

- a) Exceptional circumstances for release of Green Belt have not been demonstrated. Sites which are outside of the Green Belt that are available and should be built on.
- b) The proposed housing will not address the affordability issues for key workers especially for Oxford hospitals. New houses should be positioned on the edge of Oxford to address their unmet need.
- c) The land is not at all suburban and is fulfilling the requirements of checking unrestricted urban sprawl. The release of this site will lead to coalescence.
- d) The development is unsustainable.
- e) There will not be adequate employment at Culham Science Centre, people will not want to live where they work and it will become a commuter town
- f) SA distance
- g) The improvements to the existing railway line have not been confirmed and will be constrained by the historic assets on site.
- h) There are traffic concerns at present, the infrastructure cannot support the level of development proposed. The resultant traffic created cannot be accommodated in a sustainable manner and highways mitigations proposed off site are not sufficient.
- i) Development will cause flooding as the development area is an 'island' bordered by the Thames on three sides.
- j) Concerns in relation to ecology and the loss of biodiversity have not been addressed.
- k) Air quality issues will arise.
- l) High voltage power lines exist on site which will be inappropriate alongside the land use proposed.
- m) The publication period should be extended as no topic paper on the SODC website therefore difficult to understand why this site has been selected.
- n) The consultation process has been flawed and the views of the community have not been taken into consideration appropriately. A landowner within the Culham allocation was unaware that the proposed development boundary includes their property and have not been approached to make the land available for development.

## **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

We have no principle objection to this site being taken forward but consider it important that it is assessed comprehensively and in combination with other planning proposals of the Local Plan including transport proposals as well as current applications/permissions. The allocation includes a small SSSI (Culham Brake) and adjoins a LWS (Furze Brake), adverse impact on which will need to be avoided. We welcome the inclusion of Green Infrastructure along the northern boundary of the site with the Thames but further detail is required to understand whether this buffer will be sufficient. The site also adjoins Radley to Abingdon Conservation Target Area

(CTA) and any development on this site should contribute to the aims and objectives of the CTA.

### **Education and Skills Funding Agency**

For all the site allocations listed above, the ESFA supports the reference to school provision within the policies, but recommends a minor modification in the supporting text to signpost further detail of education requirements set out in the Infrastructure Delivery Plan (IDP). This would help to demonstrate that the plan meets the tests of soundness, having been positively prepared in seeking to meet infrastructure requirements, justified in the use of proportionate evidence, and deliverable over the plan period (effective). This was something the ESFA also recommended at the previous stage of consultation.

### **Highways England**

Consultation with the Highways Authority, with a supplementary planning document being produced. Highways England is supportive of this approach and the production of a supplementary planning document and welcomes the opportunity to contribute to this. Given the potential impact of these sites on the nearby A34, it is important to determine how any adverse impacts on the safe and efficient operation of the Strategic Road Network will be managed and mitigated.

### **Historic England**

The first paragraph of Policy STRAT7 should be amended to read, "Land within ...approximately 3,500 new homes, with the exact number to be determined based on a Landscape Capacity Assessment and full detailed landscape and visual impact assessment, including historic landscape characterisation."

Criterion vii) of Policy STRAT7 should also be reworded to read: Appropriate landscaping and an integrated network of green infrastructure, throughout the site and in particular along the boundaries of the strategic allocation which allows limited through views, based on a landscape character assessment, including historic landscape characterisation.

### **Ministry of Defence**

Site allocations for housing, employment and mixed use fall within the statutory 91.4m aerodrome height safeguarding zone surrounding RAF Benson. Therefore, we would need to be consulted on development exceeding this height criterion. The above site also falls within the statutory birdstrike safeguarding consultation zone surrounding RAF Benson. Therefore, we need to be consulted on SUDs schemes, open water bodies, wetland habitat, refuse/landfill sites etc. as these types of development have the potential to attract large and/ or flocking bird species hazardous to air traffic safety.

### **Oxford Bus Company**

This allocation cannot support local facilities and is not sustainable development. We do not see that it can be proven that a high quality public transport choice can be provided and financially sustained over the construction period. It will be relatively hard to provide bus services to this site, especially in the early phases and if linked to the existing village. Any bus route created to serve Culham would have to rely only on the new demand generated by the development itself.

The policy should be amended to give clarity on the nature of the step change on travel choices away from the car and towards public transport will manifest itself to ensure quality of development. In particular, the policy should be reworded to include reference to the level and scope of bus service improvements to this development and the relevant developers contributions arising from it.

### **UK Atomic Energy**

The plan should be amended with the entirety of the CSC. The additional allocated employment site might undermine or conflict with the plans of the CSC.

### **Oxfordshire County Council**

Further work is required on the infrastructure evidence supporting the Local Plan. The Regulation 123 list should be revised to enable further infrastructure to be obtained through development.

Amend the plan to clearly state the infrastructure challenges associated with development at and adjoining Culham Science Centre and the need to ensure that these are able to be resolved prior to any development proceeding. Mitigation through a new Culham-Didcot Thames Crossing and Clifton Hampden Bypass is likely to be required, and funding for that is not yet assured. Potential funding contributions should be included in the policies. Delivery expectations should be set out in the plan.

### **Oxfordshire County Council, Property and Facilities**

The policy needs to clarify exactly which sites will help address Oxford's unmet housing need.

### **Vale of White Horse District Council**

Growth in this area is likely to impact on the local transport network, including within Vale of White Horse District.

### **Culham Parish Council**

There are no exceptional circumstances to support this proposal. The proposal at Culham will destroy land which is Grade 2 or Grade 3a 'Best and Most Versatile' agricultural land. The proposed housing allocation at Culham is expected to deliver a significant contribution towards a new Thames road crossing. Green Belt should not be sacrificed to fund a new river crossing. This policy is also contradicted by Objective 5 and Objective 8 of the plan. The site on land adjacent to Culham Science Centre is bordered by a major river on three sides and a railway cutting on the fourth, so the proposal to build a town here in STRAT 7 is very unsafe.

### **Clifton Hampden and Burcot Parish Council**

No exceptional circumstances for Green Belt release, in particular land west of the railway line. The number of proposed houses is excessive in comparison to potential new employment opportunities at the Culham Science Centre, the size of other settlements in the area and the available infrastructure. The policy contradicts STRAT 1 with regard to Green Belt and the historic environment. Retail, service and historic impacts on Culham and Clifton Hampden. Implementation of TRANS 3 cannot be contingent on funding gained from new development at Culham under STRAT 7, but rather needs to be in place before any development at Culham for the plan to be

sound. There is no firm commitment to upgrading the rail link by the railway authority, this should be addressed in both STRAT 7 and TRANS 6: Rail. The scale of STRAT 7 is not sustainable development and the housing allocation should be reduced accordingly.

#### **Didcot Town Council**

Didcot Town Council believes that prior to any large-scale development at the Culham site adequate infrastructure must be in place.

#### **Long Wittenham Parish Council**

Long Wittenham Parish Council has serious concerns about the traffic implications if South Oxfordshire District Council's Local Plan for 3,500 homes at Culham and 2,000 houses at Berinsfield is approved. In addition, there are plans for a sand and gravel quarry at Clifton Hampden, which, if approved, will add even more traffic.

#### **Waterstock Parish Council**

The proposal to remove the land from the Green Belt is unsound and unjustified. The development is not needed and there can therefore be no exceptional circumstances to justify it.

#### **The Council's summary response to the main themes**

The Green Belt which lies within South Oxfordshire has been assessed against the purposes of Green Belt by the Local Green Belt Study (2015). National planning policy places a high emphasis on the retention of Green Belt land and expects land which contributes most to the purposes of Green Belt to be preserved under that designation (NPPF 2018, Para 133). By examining all development options across South Oxfordshire it has been possible to identify land which can meet development needs while minimising the impact on the Green Belt and the landscape. The Sustainability Appraisal makes it clear which sites have been found to be more sustainable and is consistent with the approach set out the Local Plan. The sites proposed for allocation include some Green Belt sites and some non-Green Belt sites, however there is an individual rationale for each allocation. The exceptional circumstances for the removal of the Green Belt at Culham Science Centre are strong and officers will make revisions to the supporting text to ensure these circumstances are expressed clearly in the Plan.

The concerns regarding planned infrastructure improvements, flooding, impacts on biodiversity, best and most versatile agricultural land, air quality and the existence of high voltage power lines on site are noted. The supporting evidence identifies known planning constraints for all the planned allocations and our other evidence, including the Infrastructure Delivery Plan, provides officers with additional information about the requirements to support development so that the Plan can ensure that the proposed allocations are deliverable. Specifically, it is noted that that:

- The site includes a small SSSI (Culham Brake) and adjoins a Local Wildlife Site (Furze Brake) and development is likely to lead to some impact upon these biodiversity assets;
- Cumulatively with STRAT6, the sites would result in the use of 97ha of ALC Urban classified land (brownfield), 137ha of Grade 3 and 5ha of ALC Grade 2 land.
- A small area of the area of the site (0.98 hectares) is within Flood Zone 2;
- The site is not located in or within 500m of an Air Quality Management Area.

The development anticipated to come forward on the site over the plan period will be reduced to ensure that infrastructure to support the development can be achieved in a timely manner. The infrastructure requirements are fully supported by evidence within the Infrastructure Delivery Plan. The policy makes provision for the infrastructure required to support the development and the revised Plan will include a requirement for a pedestrian/cycle bridge across the River Thames to link with Abingdon.

The development boundary for the proposed allocation at Culham will be amended by the revised plan; the SSSI at Culham Brake will be excluded for the allocated area. This will help to form a more defensible and permanent Green Belt boundary.

It should be noted that any local plan must be considered as a whole, and that the Plan includes a suite of Environmental, Design policies to ensure that biodiversity and environmental concerns are addressed by all development within the district. The sustainability appraisal has found inclusion of the site to contribute positively to the sustainability of the district.

It is considered that the Plan has fully justified, through a robust evidence base, the allocation of the land adjacent to the Culham Science Centre for development. The site has been assessed in a sound, evidenced way which is compliant with the NPPF.

Officers will continue to work with the site promoters and other stakeholders including the County Council to bring forward a scheme for development that is appropriately supported by deliverable infrastructure including community infrastructure as required by the suite of Community Facility policies.

The Council has set out the response to the issues raised with the consultation methods under the response to the Process.

**The following changes will be made in response to the consultation:**

- The SSSI at Culham Brake will be excluded for the allocated area. Additional wording will be included to reference the Culham Brake SSSI and the need for appropriate consideration of the site when developing detailed proposals;
- The role of historic landscape characterisation will be referred to within the policy.

## **STRAT8: Land at Berinsfield**

Overall 47 people commented on this policy:

- Support 3
- Comment 7
- Object 37

The following key themes were identified in response to this policy:

- a) Exceptional circumstances for the removal of the Green Belt have not been demonstrated.
- b) Objections to the area/boundary to be inset from the Green Belt, including a lack of consultation on the boundary. The area inset does not align with the wishes of the local community and the emerging neighbourhood plan. Does not align with the evidence in the SODC Green Belt study.
- c) The regeneration package does not require the land to be removed from Green Belt; the site will be subject to speculative applications.
- d) Development should be on a smaller scale, in line with Berinsfield's 'Larger Village' status.
- e) There is no evidence to justify the level of development proposed.
- f) Concern over traffic impact on nearby villages.
- g) Site is not served by sustainable transport modes.
- h) Question deliverability within the plan period.
- i) A specific amount of employment land should not be prescribed in the policy

## **Defence Infrastructure Organisation (MOD)**

The site allocations for housing, employment and mixed use fall within the statutory 91.4m aerodrome height safeguarding zone surrounding RAF Benson. Therefore, we would need to be consulted on development exceeding this height criterion. The above site also falls within the statutory birdstrike safeguarding consultation zone surrounding RAF Benson. Therefore, we need to be consulted on SUDs schemes, open water bodies, wetland habitat, refuse/landfill sites etc. as these types of development have the potential to attract large and/ or flocking bird species hazardous to air traffic safety.

## **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

No principle objection to this allocation but are concerned about the limited amount of Green Infrastructure indicated in the strategic allocation map in appendix 2. We also note that the site adjoins Dorchester Gravel Pit LWS and any development on this site will need to be designed in a way that avoids significant impacts on the nature conservation interest of this site. Question whether the site might comprise farmland bird interest. The site also adjoins Thames Clifton to Shillingford CTA and any development on this site should contribute to the aims and objectives of the CTA.

## **Highways England**

Highways England notes the update to the policy.

## **Historic England**

According to our records, there are no designated heritage assets in Berinsfield. However, a brief review of the Oxfordshire Historic Environment Record indicates that Berinsfield lies within an area of high archaeological potential. The Thames gravels in the locality is an unusually rich area for the preservation of sites of pre-historic,

Roman and Anglo-Saxon archaeology. A predetermination archaeological desk-based assessment and evaluation should be undertaken to establish a suitable and appropriate level of mitigation. Ideally, given the known archaeological sensitivity of Berinsfield, this assessment should have been undertaken before now as part of the adequate, up-to-date and relevant evidence about the historic environment required by the National Planning Policy Framework. The proposed strategy and masterplan for the regeneration of Berinsfield should take full and proper account of the known and potential archaeological interest of the parish, some of which may be of national importance.

### **Oxford Bus Company**

Any redevelopment of Berinsfield should be done in such a way to allow access to existing services along the A4074 rather than to expand any further from this road. Commercial bus operation in Berinsfield had to be withdrawn in 2016 due to insufficient passenger numbers and any regeneration without a bus service provided is not likely to be sustainable. Buses operate every 30 minutes along the A4074 and realistically any improvements will be focussed on this route rather than around Berinsfield village. There could be potential to divert and enhance X39/X40 which passes near to the site linking Oxford with Wallingford and Reading which currently operates half hourly daytime. The Location proposed however is somewhat distant from the A4074 and therefore there is potential for the site to be less sustainable than set out in the draft policy. With the proposed location of the site significant improvements would need to be made along Wimplestraw Road, Burcot Lane and a new connection to A4074 Oxford Road for the site to be served. We consider a bus plug junction at A4074 and Drayton Road to be essential in serving such a new development and would wish to see this as a pre-requisite to development.

### **Sports England**

Support the policy however, one of the bullet points is too ambiguous. The regulation swimming pool size should be specified at 20m, 25m, 50m. There are 2 sizes of 4 court sports hall - 33.5 x 18m and 34.5 x 20m, the latter being the preferred size by most sports. The bullet point should be amended to require the following “new premises for the Abbey Sports centre, including a replacement swimming pool and a 34.5 x 20 m sports hall”

### **Oxfordshire County Council**

The following changes should be made to the policy:

- i) - deliver a scheme in accordance with ~~an agreed comprehensive masterplan and strategy for the regeneration of Berinsfield~~ a Comprehensive Development Framework SPD and contribute to infrastructure in the manner set out in that Framework which will require all phases of development to contribute fairly towards the joint responsibilities for transport, education, open space and other infrastructure.
- ii) - meet the entire cost of the necessary regeneration package, including social, environmental, recreation, housing and public services infrastructure
- iii) transport mitigation measures
- iv) improvements to the cycling and walking network, including to an off-road route between Berinsfield and the edge of Oxford largely following the line of the Roman road.
- v) - sufficient additional education capacity, likely to be two primary schools on site and a contribution to a new secondary school



viii) Provide ~~for public transport facilities and connections within the village and to and from the surrounding area~~ by pump-priming new and improved services”

### **The Council’s summary response to the main themes**

The exceptional circumstances for the removal of the Green Belt at Berinsfield were set out in detail in Paragraph 4.49 of the Plan. While it is noted that the boundaries proposed do not align with the emerging neighbourhood plan, the Green Belt boundaries have been adjusted to accommodate the development in light of the evidence base including the Green Belt Study and the Strategic Allocation Landscape Sensitivity Final Report (January 2018) which supported the site allocations. As set out in Paragraph 4.55 of the Plan, it is considered that the area to be released from the Green Belt at Berinsfield will allow for clear and recognisable Green Belt boundaries to be established. It is envisaged that not all the land will be required for development and that areas of green infrastructure, which will help to redefine the settlement edge, will be provided. Allocation of the land within the local plan will mean that any speculative application for the land will need to meet the requirements set out in the policy.

Options for producing an SPD for Berinsfield are currently being considered, which will give the Neighbourhood Plan Group and members of the community a further opportunity to shape the development of the area.

The policy makes provision for the infrastructure required to support the development. Changes will be made to the policy so that the requirements supported by evidence within the Infrastructure Delivery Plan are delivered. Officers will work with Oxfordshire County Council and local bus operators to secure improved bus services to Berinsfield.

A heritage study has been commissioned by the site promoters. This will include archaeology.

### **The following changes will be made in response to the consultation:**

- The policy will be amended to require a contribution to road infrastructure such as the new Culham river crossing, the Clifton Hampden bypass and upgrades to the Golden Balls roundabout;
- The policy will be amended to require the provision of sufficient education capacity and will advise that this is likely to be or two primary schools on site and a contribution towards a new secondary school and special education needs off site;
- Retail requirements will be amended to require an appropriate amount of convenience retail floorspace to support the regeneration of the village;
- The requirements for sports facilities will be guided by the revised policies for the provision of community facilities.

**STRAT8i: Berinsfield Local Green Space**

1 person commented on this policy:

Question the rationale behind removing land from the Green Belt then allocating part as Local Green Space.

**The Council's summary response**

The proposal to designate the village green as a Local Green Space aims to retain this important open space in the centre of the village. Without designation as open space, this area would be open to speculative applications once the Green Belt designation has been removed.

**The following changes will be made in response to the consultation:**

None

### **STRAT9: Land at Chalgrove Airfield**

Overall 384 people commented on this policy:

- Support 2
- Comment 20
- Object 362

The following key themes were identified in response to this policy:

- a) The site is not available or viable and therefore not deliverable.
- b) The impact of this proposal and other developments at Chalgrove will have an unacceptable impact on the village
- c) The level of jobs proposed does not balance with the level of homes envisaged
- d) The resultant traffic created cannot be accommodated in a sustainable manner and highways mitigation off site is not sufficient
- e) Concerns raised about the impact on ecology and historical issues have not been addressed
- f) The existing business use is not compatible with potential new residents
- g) development at the airfield will exacerbate flooding issues within Chalgrove village.
- h) Homes should not be built here, but instead in the Green Belt at the edge of Oxford.

### **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

Not concerned about direct impacts on designated sites, but in case of potential indirect impacts further afield such as Aston Rowant SAC and the Chilterns caused by increased air pollution and recreational pressure. There may be ecological issues on site.

### **Chilterns AONB Conservation Board**

The policy STRAT9 fails to mention or address the setting of the AONB or views from Watlington Hill. The Chilterns Conservation Board does not object to the allocation but wishes to see changes to ensure the views from the AONB are conserved and enhanced.

### **Defence Infrastructure Organisation**

The site allocation falls within the statutory 15.2m aerodrome height safeguarding consultation zone surrounding RAF Benson, as well as the technical Precision Approach Radar (PAR) safeguarding consultation zone. Therefore, we would need to be consulted on development exceeding this height criterion. The above site also falls within the statutory birdstrike safeguarding consultation zone surrounding RAF Benson. Therefore, we need to be consulted on SUDs schemes, open water bodies, wetland habitat, refuse/landfill sites etc. as these types of development have the potential to attract large and/ or flocking bird species hazardous to air traffic safety.

### **Education and Skills Funding Agency**

The ESFA supports the Council's allocation and safeguarding of land for schools but this should be clearer.

### **Environment Agency**

We recommend that the following point is added to this policy: Appropriate foul drainage options that will not result in non-compliance with the Water Framework Directive in accordance with Water Cycle Study.

### **Highways England**

The policy has also been expanded to include the expectation that improvements to highway infrastructure will be facilitated and is welcomed by Highways England.

### **Historic England**

Historic England notes that the developable area shown on the map in Appendix 2 is outside the area of the Registered Battlefield, which we welcome as any significant development on that part of the former airfield within the registered area would be likely to amount to substantial harm to the significance of the Battlefield. Further assessment of the significance of the Registered Battlefield and of the Airfield itself, is required to determine whether the principle of a new settlement on the Chalgrove Airfield is acceptable. More than a desk-based assessment and evaluation may be required and should consider both above and below-ground features and remains.

### **Homes England (formerly the Homes and Communities Agency)**

The HCA supports the strategic allocation of Chalgrove Airfield for residential led mixed use development. As a brownfield site, not located within the Green Belt or within AONB, the HCA agrees with the Council that it represents an excellent opportunity for strategic sustainable development. The HCA confirms that the proposals at Chalgrove are developable, there is a reasonable prospect that the site is available; and deliverable. Appropriate mitigation will be provided. The allocation should be more flexible in terms of land use.

### **North Wessex Downs AONB**

No objection in principal but would wish to see views from the AONB conserved and enhanced.

### **Oxford Bus Company**

Consider the allocation is not a location where unmet housing need should be met and constitutes an unsustainable location. The scale of development will not support the provision of on site facilities to reduce commuting. Edge of Oxford is preferable for development.

### **Oxfordshire County Council**

Additional transport mitigation may need to be modelled and off site infrastructure provided, concern that this will be a car based development. The County Council is not confident that the policies for the strategic sites provide for the anticipated need for additional land for education. Unclear how runway will be moved. It is not clear what funding is available for the offsite highways works.

### **Oxfordshire County Council – Property Services**

It is not considered that development at this location will help to meet Oxford City's unmet housing need.

**Berrick Salome Parish Council**

The allocation is unsound by virtue of its location and relationship to Oxford, its traffic impact, its absorption of the B480 and approach to bypasses.

**Chalgrove Parish Council**

The relocation of the runway will impact on setting of Listed Buildings. Concern about school places, potential bird strike, ecological impact, pedestrian and cycle movements, pollution, landscape harm and deliverability.

**Cuxham with Easington Parish Meeting**

Poor location to meet unmet needs. Unsustainable location. Concerns over traffic generation, flood risk, pollution, impact on historic battlefield and Duty to Cooperate.

**East Hundred Parish Council**

Development at Chalgrove Airfield should be prioritised above Green Belt sites.

**Great Haseley Parish Council**

Concerns of noise pollution which could lead to complaints and the closure of Martin Baker. Unsustainable location and would require significant infrastructure contributions.

**Great Milton Parish Council**

The site cannot meet Oxford's unmet need and is in an unsustainable location. Concerns are raised in respect of flood risk, noise, traffic impact, historic environment and community.

**Little Milton Parish Council**

STRAT9 (ii) needs to include the mitigation of the clean water discharge from sewage treatment works as this also adds to the volume of water in local streams and could cause increased seasonal flooding downstream in either Stadhampton or Little Milton parishes.

**Pyrton Parish Council**

Poor location to meet unmet needs. Unsustainable location. Concerns over traffic generation, flood risk, pollution, impact on historic battlefield and Duty to Cooperate.

**Watlington Parish Council**

STRAT9 may achieve a sustainable community at Chalgrove, but it will be at the expense of the sustainability and traffic impact of the neighbouring communities.

**Wheatfield Parish Council**

Inappropriate scale with inadequate accessibility. Concerns regarding deliverability.

**Chalgrove Neighbourhood Plan Group**

Unsustainable location which fails to make adequate provision for supporting facilities and infrastructure. There is limited employment potential in the area to accommodate this level of population. Will increase flood risk and increase traffic and commuting. The site is undeliverable and would cause landscape harm

### **The Council's summary response to the main themes**

The Council remains committed to the inclusion of this site as a reasonable and sustainable development option in the heart of South Oxfordshire. It will bring with it the opportunity to provide new services and facilities and to improve the local highway network. The site is outside of the Green Belt and AONB and as such offers a reasonable location to deliver strategic development without compromising land within those designations.

As with the other strategic allocations the supporting evidence identifies known strategic planning constraints and other evidence will provide officers with additional information about the requirements for development. Specific requirements for education provision, transport infrastructure and public transport improvements will be added to the policy as evidenced by the infrastructure delivery plan.

Officers will continue to work with the site promoters, the tenants, and other stakeholders including the County Council to bring forward a scheme for development that is appropriately supported by deliverable infrastructure. An area of safeguarded land has been agreed within the site to ensure the future operations of Martin-Baker.

Homes England (formerly the Homes and Community Agency) has confirmed its commitment to deliver the site and there is a realistic prospect that housing will start to be delivered on the site within five years in line with the approach set out in the National Planning Policy Framework. It is now anticipated that development of the site will continue well beyond the plan period with 2,025 of the 3000 homes expected to be delivered by 2034.

Policy EP4 of the Local Plan requires new development to ensure that flood risk is not increased elsewhere as a result of new development and that all new development addresses flood risk. Revisions to EP4 will ensure that drainage options will result in compliance with the Water Framework Directive in accordance with the Water Cycle Study. In addition, a new requirement will be added to the policy to require delivery of a surface water management scheme for the benefit of the existing village of Chalgrove.

Other detailed matters will be addressed through the planning application.

### **The following changes will be made in response to the consultation:**

- The approach to bringing the site forward will be clarified in the supporting text of the revised Plan;
- A new requirement will be added to the policy to require delivery of a surface water management scheme for the benefit of the existing village of Chalgrove;
- The policy will make clear the requirements for highways, public transport and education provision;
- Specific references to Rofford Hall and Manor will be removed and the remainder of the paragraph rephrased.
- The policy will make reference to views from the AONB.

## **STRAT10: Land at Wheatley Campus, Oxford Brookes University**

Overall 31 people commented on this policy:

- Support 3
- Comment 8
- Object 20

### **The following key themes were identified in response to this policy:**

- a) Support for re-use of previously developed land. Development should be restricted to the existing built footprint.
- b) The number of homes proposed should be reduced. Allocating the site for at least 300 homes is too open-ended. This number of homes will result in Holton's identity being lost. The proposed quantum of development is inappropriate in the Green Belt.
- c) The site should not be removed from the Green Belt; it performs important Green Belt functions.
- d) The site is too far from Oxford. It will not help to meet Oxford City's unmet need. Alternative sites closer to Oxford should be considered.
- e) New development will be isolated from the rest of Wheatley.
- f) Insufficient evidence that the site is deliverable.
- g) SHELAA Site 982 is a reasonable alternative that should have been tested. No justification is provided for not allocating this site. Site 982 could be delivered alongside the Wheatley Campus site to provide a larger quantum of development.
- h) Paragraph 4.61 is incorrect. Surrounding uses are not predominantly residential.
- i) The suggestion to only allow vehicular access to the west will increase congestion and road safety issues. This is contrary to the emerging Wheatley Neighbourhood Plan which requires access from both the east and the west.
- j) Views to the site from the Grade I listed St Bartholomew Church in Holton should be taken into consideration.

### **Defence Infrastructure Organisation (MOD)**

The site does not fall within statutory safeguarding areas of interest.

### **Historic England**

Welcome the recognition of the scheduled monument on the campus. The Scheduled Monument of the moated site of Holton House and its associated ice house and the Grade II listed Holton Park and six other listed structures all lie just to the north-west of the campus. Any redevelopment of the campus should retain the Scheduled Monument on the site and respect both its setting and that of the Scheduled Monument and listed buildings to the north-west. Further assessment of the significance of the Monuments and listed buildings and of the potential impacts of development on that significance may be necessary to determine the form that development should take to avoid or minimise harm.

The Sustainability Appraisal recommends a predetermination archaeological deskbased assessment and evaluation to be undertaken to establish a suitable and appropriate level of mitigation. If that assessment has not yet been undertaken, it should be undertaken before the preparation of the masterplan to establish where development may be acceptable and the form that development should take to avoid or minimise harm to the significance of the archaeological remains.

### **Oxford Bus Company**

Without an operating university campus, a bus service entering the site is unlikely to be financially viable with only 300 dwellings. Therefore, there needs to be high quality public transport within and adjacent to the site, although they would need to be financially supported. Good urban design principles will also need to be exercised to ensure that the dwellings with high concentrations of residents are nearer to the bus service that must be able to penetrate the site. It is therefore proposed that STRAT10iv be reworded to include reference to the level and scope of bus service improvements to this development and the relevant developer's contributions arising from it.

### **Scottish and Southern Energy Power Distribution (SSE)**

It is anticipated that there may be sufficient capacity available with the existing substation and distribution network to serve the proposed development.

### **Sport England**

Generally support the policy. Bullet point iii) should be amended to read: "the retention of the of existing sports facilities or provide suitable imitation/replacement off site to ensure there is no deficit of quantity or quality created by the redevelopment of the site".

### **Oxfordshire County Council**

The primary school pupil generation from approximately 300 houses at Wheatley can be expected to be accommodated at the existing primary school, but there would be a capacity issue if more houses are proposed in the area. The Wheatley Park Secondary School is expected to expand. In addition to primary and secondary schools, publicly funded provision is also expected for Special Education Needs and for early years and child care. Financial support for bus services through the site required.

### **Holton Parish Council**

The site is within the parish of Holton, not Wheatley. It is unclear whether alternative uses for the site have been considered. Surrounding land uses are not predominately residential. Development should be confined to the previously developed land only. Allocating the site for at least 300 homes is too open-ended. Vehicle access from the east should not be restricted to emergency and pedestrian access only, traffic flows to and from the site should be dissipated as widely as possible. Reference should also be made to protecting the views towards the site from St Bartholomew's Church in Holton which is Grade I Listed and within approximately 300 metres of the site.

### **Waterstock Parish Council**

It is unclear whether development will extend beyond the previously developed area. The site should not be inset from the Green Belt.

### **Wheatley Parish Council**

There is insufficient infrastructure to support development. (Insufficient pedestrian and cycle connections, medical facilities, school capacity and waste water treatment capacity). The impacts of more than 300 homes has not been tested. Development should be limited to a maximum of 300 homes. The provision of a pedestrian and cycle bridge from the site to the London Road area of Wheatley is essential.



Development should provide a through route for traffic to support the efficient routing of buses and to reduce traffic flows through the centre of Wheatley.

### **Wheatley Neighbourhood Plan Group**

The opportunity to use the development of this site to help meet housing needs, expand employment opportunities and to act as a catalyst for the regeneration of neglected areas of Wheatley is welcomed. Priority should be given to integrating new homes effectively into Wheatley notwithstanding the potential barrier of the A40. The provision to ensure that development is only on the existing built footprint is also supported.

### **The Council's summary response to the main themes**

Wheatley Campus is a partially developed site in the Green Belt. It is not considered that a comprehensive redevelopment of the site can be viably achieved within the existing built footprint. It is the intention of the Plan to achieve redevelopment of the site without further restricting the overall openness of the Green Belt within the proposed allocation. In order to achieve this, it is proposed that the site is removed from the Green Belt.

The site is currently used and owned by Oxford Brookes University. Oxford Brookes University is seeking to consolidate its activities on its main Headington campus within Oxford City and will therefore be relocating current uses away from Wheatley Campus. Oxford Brookes University has stated that all activities at its Wheatley Campus are expected to cease by 2021/22. The site will then be available for development. Oxford Brookes University is currently pursuing the sale of this site.

The call for sites submission confirmed Oxford Brookes University's intention to develop this site for residential development. An outline planning application for residential development of up to 500 dwellings was registered during January 2018 with further detail submitted for consideration during October 2018. The application is currently pending consideration (Planning application reference: P17/S4254/O).

The Local Plan Viability Study tested a brownfield, 300 dwelling development type which was found to be viable. The proposed allocation site is subject to a number of constraints; these are not considered insurmountable. The majority of the identified constraints can be overcome by focusing development on the eastern side of the site and through sensitive design. There is no evidence to suggest that this site is not deliverable.

The principle of redeveloping previously developed sites in the Green Belt is set out in national policy. NPPF 2018 states at Para 145 Clause g, that proposals for redevelopment should not have a greater impact on the openness of the Green Belt than the existing development. This is reflected in paragraphs 4.66 and 4.67 of the Plan.

The precise quantum of development that is appropriate on this site will be dependent upon the impacts of development on the Green Belt and designated heritage assets, as well as how the design responds to other constraints. This can only be tested as detailed proposals are developed. The allocation of the site for a minimum of 300

dwelling is based on high level assessments undertaken to inform the Local Plan process taking into consideration constraints, the existing built footprint and the need to ensure an efficient use of land.

Concerns have been raised that development on this site will be physically separated from the village of Wheatley due to the A40. This is addressed within Policy STRAT10 by criteria vi which requires cycle and pedestrian links to the centres of Wheatley and Holton to be provided.

Oxford Bus Company and Oxfordshire County Council have both highlighted that there is likely to be a need for financial support for bus services through the site. It is proposed that an additional criterion is added to Policy STRAT10 to reflect this.

The policy wording provides flexibility to allow vehicle access from the west if needed. Access requirements will need to be assessed and tested in more detail at the planning application stage.

While the policy highlights the importance of Holton Park, consideration of the relationship between development on this site and other heritage assets in the area is also required. It is noted that Historic England welcome the recognition of the scheduled monument on the campus.

**The following changes will be made in response to the consultation:**

- A criterion will be added to the policy to require the retention existing sports facilities or provision of suitable replacement facilities to ensure there is no deficit of quantity or quality created by the redevelopment of the site;
- The policy will be amended to enable buses to move through the site;
- A reference to surrounding Listed Buildings and Scheduled Monuments surrounding the proposed allocation will be added to the policy.

### **STRAT11: Green Belt**

Overall 13 people commented on this policy:

- Support 1
- Comment 1
- Object 11

The following key themes were identified in response to this policy:

- a) Exceptional circumstances have not been demonstrated for the removal of the Strategic Allocations from the Green Belt.
- b) The Council has not used the findings of their own evidence in an informed or justified way.
- c) The Council should remove the Wheatley Campus, Oxford Brookes University site from the Green Belt.

### **The Council's summary response to the main themes**

The Plan has provided sound justification for the exceptional circumstances for Green Belt releases. This is contained within the Green Belt Study and Para's 4.4, 4.49 and 4.71 of the Local Plan.

It is noted that certain of the criteria included in Para 4.4 are purposes of the Green Belt rather than exceptional circumstances for the removal of the designation and in order to clarify our position these statements will be removed.

It is proposed to remove the Wheatley Campus site from the Green Belt.

The policy refers to the Wheatley NP being supported to make allocations but those very special circumstances may be able to be demonstrated through the application process.

### **The following changes will be made in response to the consultation:**

None.

## **HEN1: The Strategy for Henley-on-Thames**

Overall 5 people commented on this policy:

- Support 1
- Comment 2
- Object 2

The following key themes were identified in response to this policy:

- a) Policy should include the requirements set out in policy H3.
- b) Concern that existing infrastructure cannot support new development.
- c) Delivery of affordable housing is a key issue in Henley.
- d) Policy should include reference to protection of employment sites and new employment land, and the supply of affordable housing.
- e) Air quality is an issue and needs to be properly addressed.

## **Historic England**

Support the policy

## **The Council's summary response to the main themes**

An Infrastructure Delivery Plan has been prepared to inform the level of services that are required to support the development proposed in the Plan, and how these can be funded.

The Council's position on the provision of affordable housing is set out in policy H11. This requires at least 40 percent of homes on sites of 11 homes or more to be affordable housing, subject to the viability of the site.

Policy EMP3: Retention of Employment Land guides the protection of existing employment sites.

Policy EP1 of the Plan deals with air quality and requires developments to comply with the Council's air quality action plan and the Council's developer guidance document. This document provides technical advice on how to deal with planning applications that could have an impact on air quality and human health.

## **The following changes will be made in response to the consultation:**

None

## **TH1: The Strategy for Thame**

Overall 12 people commented on this policy:

- Support 1
- Comment 3
- Object 8

The following key themes were identified in response to this policy:

- a) Cross border developments need to be taken into account. They will put pressure on infrastructure;
- b) Thame is a highly sustainable location for growth, is unconstrained and could accommodate more development;
- c) Strategic sites should be allocated in the local plan, not in a neighbourhood plan;
- d) The neighbourhood plan will become out of date upon adoption of the Local Plan and will need reviewing. This will delay delivery of housing;
- e) Policy should reference housing requirements and contingency policy.

### **Historic England**

Supports the policy

### **Thame Town Council**

Request an additional criterion to the policy to cover new/improved community facilities.

### **Oxfordshire County Council**

Considers there is scope for suitable sites to be found at Thame for the 510 homes allocated.

### **The Council's summary response to the main themes**

Haddenham in Aylesbury Vale is identified in the Submission version of their local plan for growth of 1,051 homes. This will be supported by infrastructure to support this growth. Notwithstanding this, it is recognised that Thame provides a range of services and facilities to residents in Buckinghamshire; officers from each of the councils will continue to work together on cross boundary issues as part of the duty to cooperate.

Traffic forecasting work is continuing to be undertaken by South Oxfordshire District Council (SODC), Aylesbury Vale District Council (AVDC) and Wycombe District Council (WDC) in association with their respective Highway Authorities (Oxfordshire County Council (OCC) and Buckinghamshire County Council (BCC)), to assess the impacts of growth on the road network.

### **The following changes will be made in response to the consultation:**

An additional criterion to provide new, or enhanced community facilities that meet an identified need will be included in the revised policy.

### **WAL1: The Strategy for Wallingford**

Overall 11 people commented on this policy:

- Support 1
- Comment 1
- Object 9

The following key themes were identified in response to this policy:

- a) Policy should identify land to be allocated in Wallingford for housing development
- b) Policy does not support growth in Wallingford
- c) Parking is a concern
- d) Air quality is a concern

### **Historic England**

Support the policy and the inclusion of points ii) and iii)

### **The Council's summary response to the main themes**

The view that local communities should direct where development is located is supported by the Council. Therefore, with the exception of strategic allocations, all other specific housing land allocations should be made through neighbourhood plans wherever this is possible. This approach is supported by national policy as set out in Paras 65 and 66 of NPPF 2018.

Policy H3: Housing in the towns of Henley-on-Thames, Thame and Wallingford covers the homes to be delivered in Wallingford, and the safeguarded site west of Wallingford (Site B). The requirements of the policy do not need to be repeated in policy WAL1.

Policy EP1 of the Plan deals with air quality and requires developments to comply with the Council's air quality action plan and the Council's developer guidance document. This document provides technical advice on how to deal with planning applications that could have an impact on air quality and human health.

### **The following changes will be made in response to the consultation:**

None.

## **Chapter 5: Delivering New Homes**

### **Housing Policies**

#### **H1: Delivering New Homes**

Overall 67 people commented on this policy:

- Support 7
- Comment 6
- Object 54

The following key themes were identified in response to this policy:

- a) The plan should contain trajectory for allocated sites, showing annual delivery. It is hard to judge if the plan is deliverable without this information;
- b) Unrealistic/over-optimistic lead-in times and build-out rates for strategic sites;
- c) There is a heavy reliance on strategic sites. The plan needs to include moresmaller sites/a greater range of site sizes;
- d) There is an over-reliance on neighbourhood plans;
- e) Policy as worded is too permissive, in particular with regard to PDL and infill;
- f) Policy wording is overly restrictive and would restrict development on suitable sustainable sites.

#### **Chilterns AONB Board**

Suggested changes relating to infill development and the approach to previously developed land.

#### **Thame Town Council**

Strategy does not align with NPPF as the Plan is expecting neighbourhood plans to support and deliver growth that is not strategic, whereas the NPPF states that neighbourhood plans must support strategic growth. The Council considers that the Plan expects neighbourhood plans to deliver housing outside of the OAN.

#### **The Council's summary response to the main themes**

An up-to-date statement on the 5-year housing land supply position will be produced to support the Submission Local Plan. This will include details on how the backlog has been treated and how the buffer has been applied. It will also include trajectories for the allocated sites. The trajectories will be based on information supplied by the developers, as well as projections. The lead-in times for the large strategic sites are pushed back to later in the plan period in recognition of the fact that they take longer to come forward and may have complex infrastructure requirements.

The council remains committed to supporting Neighbourhood Development Plans and views them as a key component to ensuring the delivery of the overall spatial strategy. Neighbourhood plans also provide the best opportunity for communities to manage growth and development in their own localities.

Neighbourhood planning is strongly promoted by the Government, and has a high take up in South Oxfordshire. The Plan's proposed devolution to Neighbourhood Development Plans is an innovative approach which is fully supported by NPPF 2018 Paras 65 and 66. The Plan includes a policy that will operate as a contingency if a neighbourhood Development Plan cannot, or will not, allocate the required level of

development; policies H3 and H4 will ensure delivery in the towns and larger villages where a neighbourhood plan does not progress adequately/timely. The amount of housing expected to be delivered through neighbourhood plans will contribute towards our OAN and forms a central part of our overall spatial strategy.

The spatial strategy within the Plan directs development to Didcot, Science Vale, strategic allocations and to the towns and larger villages, with limited growth at smaller villages, proportionate to their size. This provides for a range of site sizes and types. Strategic sites are expected to deliver a total of 10,415 homes. The total supply of housing over the plan period is 28,459 homes, so strategic sites account for approximately 37 percent of the total supply. It is not considered that this represents an over reliance on strategic sites, but rather a balanced approach to housing supply.

The local plan needs to strike a balance between flexible positive policies for development in appropriate locations and restrictive policies to protect the most important environmental, historic and social assets. The Council must ensure that where development is built it will be supported by appropriate infrastructure.

**The following changes will be made in response to the consultation:**

- Clause ii) will be amended to support appropriate infilling within the existing built up areas of towns, larger, smaller and other villages;
- The policy will be amended to reference compatibility with other policies in the development plan and safeguarding the natural and historic environment;
- The policy will be amended to note that where Neighbourhood Development Plans are not progressed in the market towns and villages, applications will be considered against the housing targets for the settlement as identified by the relevant policy for the settlement tier.



## **H2: New Housing in Didcot**

Overall 20 people commented on this policy:

- Support 1
- Comment 9
- Object 10

The following key themes were identified in response to this policy:

- a) Past under delivery in Didcot should be factored into the requirements. Not all safeguarded sites can be considered deliverable;
- b) Additional allocations (in Didcot and district wide) are required to compensate for slow delivery;
- c) Development trajectories are needed for Didcot sites;

### **Thames Water**

Water infrastructure capacities for allocated sites in Didcot are likely to be met by the existing infrastructure.

### **Oxfordshire County Council**

Support growth at Didcot.

### **The Council's summary response to the main themes**

The Council is committed to significant growth in Didcot, in partnership with the Vale of White Horse, that is supported by high quality infrastructure. The Garden Town project will help to see this vision delivered.

The Council will publish an up-to-date statement on the 5-year housing land supply position to support the Submission Local Plan. This will include details of how the backlog has been treated and how the buffer has been applied in accordance with the NPPF. It will also include trajectories for the allocated sites. The trajectories will be based on information supplied by the developers, and guided by the IDP to supplement the projections. It is anticipated that, in acknowledgement of the lead in times for the large strategic sites, the anticipated delivery on these sites will be pushed back to later in the plan period to reflect any complex infrastructure requirements.

### **The following changes will be made in response to the consultation:**

None

### **H3: Housing in the towns of Henley-on-Thames, Thame and Wallingford**

Overall 46 people commented on this policy:

- Support 4
- Comment 9
- Object 33

The following key themes were identified in response to this policy:

- a) The housing number for Henley-on-Thames is too high. The town is constrained by AONB and the river Thames;
- b) The collective target for the three towns should be disaggregated. Under delivery in one town should not imply further delivery in another.
- c) The market towns should take more growth. Thame is unconstrained and could take more development;
- d) Over reliance on neighbourhood plans, sites should be allocated in the local plan;
- e) The time period allotted for the review of neighbourhood plans is too short;
- f) The method for allocating growth (15 percent) is not justified or based on evidence;
- g) Lack of evidence on infrastructure constraints eg GP surgeries;
- h) There was support for the allocations to the market towns.

### **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

Note that this policy requires the allocation of development sites in smaller settlements to be done via Neighbourhood Plans. Some of the villages are surrounded by diverse wildlife-rich countryside (e.g. in the Chilterns AONB). We are mindful that not all local communities might have access to the necessary expertise when preparing these plans and we are concerned that this might result in sites being allocated in locations that result in direct or indirect adverse ecological impacts on habitats or species of nature conservation interest. They might also have insufficient knowledge of how the integration of green infrastructure and biodiversity in development can be maximised. Having reviewed some of the Neighbourhood Plans that are currently in preparation we note significant variations and emphasises between the different plans including their approach for nature conservation. We are not sure how much support the Council is giving communities in preparing these plans but consider it essential that communities are adequately supported.

### **Chilterns Conservation Board**

The allocation at Henley-on-Thames is too high. Henley-on-Thames is constrained by the AONB, and the Council has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. Very little weight appears to have been given to NPPF para 115 in the distribution decision. The numbers could easily be lowered by reducing the over-supply provided for in the plan. The 15% allocation, on top of Core Strategy allocations, could involve major development in the AONB, which is specifically prohibited by paragraph 116 of the NPPF unless in exceptional circumstances and where it is in the public interest. Accommodating a mathematically-derived proportion of housing growth is unlikely to meet that test.

Extant permissions should be deducted from each town's figure, reducing the need for allocation. Establishing a local presumption in favour is contrary to the NPPF para

14 footnote 9. Table 5d and Policy H3 lack clarity that the targets for NDPs are on top of Core Strategy numbers for the market towns.

### **Natural England**

The policy approach to allocate 15% growth to be delivered through Neighbourhood Plans for the 3 towns and larger villages is not one we are aware of having been used elsewhere. We have concerns that this approach does not fulfil the requirement of paragraph 110 of the NPPF to ensure allocated sites are on land of least environmental value, as this cannot be strategically assessed by NDPs. Within the AONB we also have concerns regarding the ability for individual NDPs to assess alternatives to fulfil the requirements of paragraph 116 of the NPPF. We also have concerns about the presumption in favour of development in these villages in the absence of NDP adoption, particularly within the AONB (paragraph 14 of the NPPF specifically excludes AONBs and SSSIs from the presumption in favour of sustainable development).

### **Aylesbury Vale District Council**

The Final Publication Version document at page 63 identifies a growth of 510 homes to be taken forward in the Thame neighbourhood plan review. Therefore, AVDC as a consultee adjoining that neighbourhood area will be keen to see where the sites come forward and if there are any impacts into the Vale such as landscape/visual impact or capacity of the congested A418.

### **Buckinghamshire County Council**

BCC acknowledges the Local Plan proposes to honour the proposed level of growth within the Thame Neighbourhood Plan. BCC along with the Districts in Buckinghamshire have undertaken Strategic Countywide Transport Modelling, which models the proposed housing and employment growth across the County. This modelling of the proposed growth in Buckinghamshire and the proposed growth through the Thame Neighbourhood Plan indicates increased pressure on the A418 in and out of the county, specifically around the Thame roundabout. This route is strategically important for public transport, road, cycling and access to rail, across the Buckinghamshire/South Oxfordshire boundary from Thame to Haddenham. BCC asks that the District continues to engage with BCC and Oxfordshire County Council, as Highway authorities, to ensure appropriate mitigation is put in place.

### **Oxfordshire County Council**

The County's concerns with leaving such a large number of house allocations to neighbourhood plans relate to effective infrastructure planning. The locations of housing allocations will need to be considered upon each individual Neighbourhood Plan. Policies H3 and H4 also provide for speculative planning applications in the event that neighbourhood plans do not proceed to allocate sites which could lead to unforeseen consequences as infrastructure will then need to be considered incrementally in respect of individual planning applications. The plan is not justified as there is not a robust and credible proportionate evidence base for deliverability of the housing figures. Further work is required and additional allocations may be needed.

The County Council considers that there is scope for suitable sites to be found at Thame for the 510 additional houses suggested, and at Wallingford for the 295 additional houses suggested. To help ensure that developments can viably address transport mitigation measures, larger sites are preferable. We set out our concerns about additional housing at Henley-on-Thames in our response to the Second Preferred Options in May 2017. The numbers have been amended so that Henley-on-Thames has a reduced requirement, now 350 houses. The County Council remains concerned that suitable sites will be difficult to find for that number of houses given that the transport network in the area is over capacity, but accepts that the issue may be able to be addressed through the Neighbourhood Plan process. As Henley is outside the area of detailed modelling in the Oxfordshire Strategic Model, additional transport evidence will be needed to support a revised Henley and Harpsden Neighbourhood Plan assessing the impacts on the transport network and proposed mitigation measures.

### **Harpsden Parish Council**

Ignoring the effects of current housing allocations is unsound. Henley on Thames and its neighbouring parish, Harpsden, should be allowed to absorb the effects of the 500 homes allocated within the made Joint Neighbourhood Plan before a second tranche of homes can be imposed. Neither Henley nor Harpsden can take the number of houses proposed by SODC without significant loss of amenity and local character. Until most of the 500 new houses are in place it is impossible to see just how badly both Henley and Harpsden will be affected. At the outset of the NP it was promised that if we accepted 450 - then 500 - new homes we would not have to take any more (other than windfalls) before 2027, so what is the hurry now? Putting anything like 350 more houses in Henley and Harpsden would almost certainly mean using sites rejected by the NP and the local public that endorsed it by referendum. Much of the local road system is fit only for a rural community of small villages and each new block of housing exacerbates existing problems; planned development along the main road threaten to gum up this major access into central Henley.

### **Thame Town Council**

The one-year deadline given for neighbourhood plan revision is inadequate, given the resources of neighbourhood plan groups. The time period recommended is at least 18 months for the market towns and larger villages; and at least two years for the smaller, and "other" villages.

There is no evidence that the Town Centre of Thame requires further housing development in order to regenerate any part of its town centre. There is the danger of providing too much housing and adding to parking congestion, pressure on local services, and the requirement for further community facilities such as community halls. This would harm the amenity and function of the Town. The reasonable alternative of testing and matching development to settlement capacity has not been explored. A thorough assessment of the capacity of existing community infrastructure should have been produced as part of the first stage of evidence gathering. The findings should be embedded into the allocation process to help inform the best

development dispersal strategy. This would lead to a Plan that actively tackles infrastructure constraints on the basis of real need.

The market towns are treated as one amorphous allocation site. The reduction in dwellings allocated to Henley has been divided between Thame and Wallingford. However, the necessary infrastructure to support the growth at market towns has only been estimated on the basis of the 15% growth. Collective responsibility for allocations between similar settlement types should only occur following a full sustainability appraisal process and investigation into necessary infrastructure requirements.

The minimum target of 1,155 homes is declared as a collective target. This means that shortfall in one market town will be expected to be picked up in the others. This is wholly unacceptable. It cannot be supposed that growth can be pushed to other NP areas without a further, specific test for sustainability. To do so may well disrupt neighbourhood plans during or shortly after their preparation. The word "collectively" should be removed from Policy H3.

### **The Council's summary response to the main themes**

The Plan should be read as a whole, there is no need to refer to national policy or other policies in the plan within specific policies.

It is considered that there is sufficient capacity within each of the market towns to meet the allocated number of homes as supported by the findings of the SHELAA. It is not the intention of the policy for deficits in delivery in one town to be supplemented by delivery in another. It is important that each Town aims to provide allocations to meet its individual requirements because Towns are sustainable settlements and growth here forms an essential part of the Plans spatial strategy. The Plan will be amended to provide clarification on this point.

An update to additional requirements for each settlement has been carried out in view of all completions to March 2018 and extant permissions to September 2018, the policy (and table 5d) will be revised to clarify how many new homes each Town's NDP will need to allocate. The policy will also be revised to provide further clarity on the amount of additional development required and will express the housing requirement as individual residual targets for the NDPs to progress.

The Council strongly advocates neighbourhood development planning and offer a range of support to neighbourhood planning groups. The Council supports the view that Neighbourhood Development Plans are an appropriate way to manage development at a local level. There has been great success in the district with drafting and making NDPs and it is anticipated that this will continue to support the overall spatial strategy of the local plan.

The Council supports the view that local communities should direct where development is located. Therefore, except for strategic allocations and larger villages not willing to progress NDPs, all other specific housing land allocations should be made through neighbourhood plans wherever this is possible. This approach is supported by national policy at NPPF 2018 Paras 65 and 66.

Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan, and with the NPPF to meet the basic conditions. The Plan's strategy is to allow proportional growth at each of the towns as a starting point and for the NDP to determine whether any more growth is acceptable or desirable to help meet community development aspirations. Ultimately a detailed evidence base will need to be provided to support each Neighbourhood Development Plan and its assessment of capacity, whether this is to support a higher or lower number than that specified by the policy.

Neighbourhood Plans are subject to a screening opinion to assess whether an SEA/SA is required to support the plan. Natural England is a statutory consultee to this screening process. The SEA/SA process would assess alternatives. Funding and support is available for carrying out site assessments and for specialist studies.

The Plan expected neighbourhood plans in the towns and larger villages to deliver a further 2,196 homes (1,155 in the market towns and 1,041 in the larger villages). The total supply over the plan period was 22,563 homes, so neighbourhood plan allocations accounted for approximately 10 percent of the total supply. The revised Plan will reduce this additional contribution to 1,018 homes (519 homes in the market town and 499 homes in the larger villages) against a total supply over the plan period of 28,465 homes, representing less than 4% of the total supply. This is not a significant proportion and is not considered to be an over reliance, but represents a balanced approach to housing supply.

The contingency period set out for the review of neighbourhood plans is 12 months from adoption of the local plan. The Publication Version of the plan, which sets out the expectations for neighbourhood plan allocations, was published in October 2017 and the Council is now consulting on a revised consultation version of the plan with a view to adopting the plan late in 2019. It is considered that neighbourhood planning groups will have been given adequate time to prepare a review of their plans, with the support of the Council and other bodies.

**The following changes will be made in response to the consultation:**

The supporting text will be amended to recommend that where Neighbourhood Development Plans are considering sites within an AONB or that form part of the setting of an AONB a Landscape and Visual Impact Assessment should be undertaken.

The policy will be amended to clarify the precise number of additional homes the plan requires each NDP to allocate to be expressed as a residual level of development.

## **H4: Housing in the Larger Villages**

Overall 66 people commented on this policy:

- Support 6
- Comment 8
- Object 52

The following key themes were identified in response to this policy:

- a) No evidence to justify 15% growth figure;
- b) Sites should be allocated in the Local Plan, not through neighbourhood plans;
- c) Larger villages should take more growth;
- d) Larger villages should take less growth especially in light of the new methodology for calculating housing need;
- e) Support for the approach of growth in the larger villages;
- f) Concern over whether impacts on the AONB had been adequately considered;
- g) Over reliance on neighbourhood plans risks 5-year housing land supply position, and delivery of affordable housing;
- h) Policy will constrain development in the early years of the plan.

### **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

Neighbourhood plans need advice and support to ensure their plans take due consideration of the ecological impacts of their plan.

### **Oxfordshire County Council**

The County's concerns with leaving such a large number of house allocations to neighbourhood plans relate to effective infrastructure planning. The locations of housing allocations will need to be considered upon each individual Neighbourhood Plan. Policies H3 and H4 also provide for speculative planning applications in the event that neighbourhood plans do not proceed to allocate sites which could lead to unforeseen consequences as infrastructure will then need to be considered incrementally in respect of individual planning applications.

### **Natural England**

The policy approach to allocate 15% growth to be delivered through Neighbourhood Plans for the 3 towns and larger villages is not one we are aware of having been used elsewhere. We have concerns that this approach does not fulfil the requirement of paragraph 110 of the NPPF to ensure allocated sites are on land of least environmental value, as this cannot be strategically assessed by NDPs. Within the AONB we also have concerns regarding the ability for individual NDPs to assess alternatives to fulfil the requirements of paragraph 116 of the NPPF. We also have concerns about the presumption in favour of development in these villages in the absence of NDP adoption, particularly within the AONB (paragraph 14 of the NPPF specifically excludes AONBs and SSSIs from the presumption in favour of sustainable development).

### **Defence Infrastructure Organisation (MOD)**

Set out requirement to consult on certain planning applications.

### **The Council's summary response to the main themes**

The strategy is to allow proportional growth at each of the larger villages as a starting point and for Neighbourhood Development Plans to determine whether any further growth would be acceptable or desirable to help communities meet their development aspirations.

The Council strongly advocates neighbourhood development planning and offers a range of support to neighbourhood planning groups. The Council supports the view that Neighbourhood Development Plans are an appropriate way to manage development at a local level. There has been great success in the district with drafting and making Neighbourhood Development Plans and it is anticipated that this will continue to support the overall spatial strategy of the local plan.

The Council supports the view that local communities should direct where development is located. Therefore, except for the strategic allocations proposed, all specific housing land allocations should be made through neighbourhood plans wherever this is possible. This is supported by national policy at NPPF 2018 Paras 65 and 66.

Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan, and with the NPPF to meet the basic conditions. The Plan's strategy is to allow proportional growth at each of the larger villages as a starting point and for the NDP to determine whether any more growth is acceptable or desirable to help communities meet their development aspirations.

Neighbourhood Plans are subject to a screening opinion to assess whether an SEA/SA is required to support the plan. Natural England are a statutory consultation body within this screening process. The SEA/SA process would assess alternatives. Funding and support is available for carrying out site assessments and for specialist studies.

The Plan expected neighbourhood plans in the towns and larger villages to deliver a further 2,196 homes (1,155 in the market towns and 1,041 in the larger villages). The total supply over the plan period was 22,563 homes, so neighbourhood plan allocations accounted for approximately 10 percent of the total supply. The revised Plan will reduce this additional contribution to 1,018 homes (519 homes in the market town and 499 homes in the larger villages) against a total supply over the plan period of 28,465 homes, representing less than 4% of the total supply. This is not a significant proportion and is not considered to be an over reliance, but represents a balanced approach to housing supply.

The approach to the growth of the larger villages extrapolates the growth rate experienced collectively within those villages during the past five years over the plan period. Officers consider this approach to be justified, offering sufficient scope for villages to grow over the plan period. Officers have identified that the land to meet the proposed growth rate of 15% is available and deliverable through our SHELAA evidence base and propose that the precise quantum of development to be located at individual villages is proportional, appropriate and dependent on existing infrastructure.



It is understood that there will be collective infrastructure requirements generated as a result of the development proposed by the Plan. However, the Council considers that the Community Infrastructure Levy, adopted in 2016, together with negotiations under Section 106/ Section 278 at the planning application stage, will ensure that the infrastructure requirements from the growth expected at the larger villages can be met.

The policies within the plan have been based on a sound evidence base which includes a Landscape Capacity Assessment of the Larger Villages (2015) which takes account of impacts on the two AONB. In addition, the operation of policy ENV1: Landscape and Countryside is considered to offer sufficient protection to the AONB.

**The following changes will be made in response to the consultation:**

- The supporting text will be amended to support NDPs wishing to allocate development sites in excess of the housing requirement where the level of growth is sustainable for the village and in accordance with national policy;
- The supporting text will be amended to recommend that where Neighbourhood Development Plans are considering sites within an AONB or that form part of the setting of an AONB a Landscape and Visual Impact Assessment should be undertaken.

#### **H5: Land to the west of Priest Close, Nettlebed**

Overall 9 people commented on this policy:

- Support 0
- Comment 3
- Object 6

The following key themes were identified in response to this policy:

- a) Not a suitable site as will impact on the AONB;
- b) It is the furthest site from the village centre;
- c) Access is over common land – not deliverable;
- d) There are ecological constraints on the site (hedgerows, pond);
- e) Lack of evidence to support allocation;
- f) High quality design features and environmental enhancements would be required.

#### **Thames Water Utilities**

No infrastructure concerns envisaged.

#### **Scottish and Southern Energy**

Information on overhead lines and the electricity supply network supplied.

#### **Defence Infrastructure Organisation (MOD)**

Set out a requirement to consult on certain planning applications.

#### **The Council's summary response to the main themes**

The ecology of the site has been considered in determining the level of development that would be appropriate. In response to the issues raised regarding ecological impacts during the Second Preferred Options consultation held during March and April 2017, the site allocation has been reduced from 19 dwellings to approximately 11 dwellings.

Access over common land can be gained through submission of an application, and it is acknowledged that this will take time to achieve. The development trajectory for this site takes this delay into account and it is expected that delivery on site will commence in 2022/23.

The site is at the northern end of the village, but is adjacent to an existing built up area (Priest Close) and is within easy walking distance of the village centre.

The Landscape Capacity Assessment for Larger Villages (2015) found that development on this site has the potential to harm the landscape setting of the village and AONB. However, the site is enclosed and is not visually prominent. The Landscape Capacity Assessment (2018) reassessed the site under reference NET1. The study found that overall the site has a medium landscape capacity, despite the location within the AONB, the site is extremely well contained and relates well to the existing village edge. The assessment found that there may be some potential for a small housing development within the site subject to appropriate boundary vegetation retention and strengthening. The inclusion of development criteria aimed at minimising impacts on the AONB together with the operation of policy ENV1: Landscape and Countryside is considered to offer sufficient protection to the AONB.

In response to the consultation and revised landscape evidence the policy will be amended to include a requirement for landscaping to minimise impacts on the AONB.

**The following changes will be made in response to the consultation:**

The revised policy will include a requirement for landscaping to minimise impacts on the AONB.

## **H6: Joyce Grove, Nettlebed**

Overall 9 people commented on this policy:

- Support 0
- Comment 3
- Object 6

The following key themes were identified in response to this policy:

- a) Uncertainty over the availability of the site;
- b) Development should also be allowed in the grounds;
- c) Site is suitable for conversion.

## **Historic England**

Request inclusion of a criterion requiring a survey of above and below ground archaeology to determine the extent and significance of archaeological remains to inform and guide the development proposals, with appropriate mitigation.

## **Thames Water Utilities**

No infrastructure concerns envisaged.

## **Scottish and Southern Energy**

Information on overhead lines and the electricity supply network supplied.

## **Defence Infrastructure Organisation (MOD)**

Set out a requirement to consult on certain planning applications.

## **The Council's summary response to the main themes**

The allocation relates to re-using existing buildings and the supporting text states that it would not be suitable for new-build housing. A requirement for archaeological survey is therefore unnecessary.

The listed building stands in a parkland setting which it is considered important to conserve. For this reason, it is not considered that the provision of additional housing in the grounds is appropriate.

The site is currently in use but it is understood that the occupants are searching for a more suitable location. Officers will assist in the search to ensure timely delivery of the allocation.

## **The following changes will be made in response to the consultation:**

None

## **H7: Land to the South and West of Nettlebed Service Station**

Overall 8 people commented on this policy:

- Support 0
- Comment 5
- Object 3

The following key themes were identified in response to this policy:

- a) Site is not well related to the rest of the village;
- b) Development here would impact on the AONB;
- c) Access is unclear;
- d) Existing agricultural use should remain;
- e) High quality design features and environmental enhancements would be required.

### **Thames Water Utilities**

No infrastructure concerns envisaged.

### **Scottish and Southern Energy**

Information on overhead lines and the electricity supply network supplied.

### **Defence Infrastructure Organisation (MOD)**

Set out a requirement to consult on certain planning applications.

### **The Council's summary response to the main themes**

It is considered that this site is well contained and is not visually prominent within the AONB. In response to the consultation and revised landscape evidence, the policy will be amended to include a requirement for landscaping to minimise impacts on the AONB.

The site is close to the village centre with access along a footpath. There is scope for access to the site to be achieved directly onto the A4130, but the access would be determined through discussions with the Highway Authority.

### **The following changes will be made in response to the consultation:**

The revised policy will include a requirement for landscaping to minimise impacts on the AONB.

## **H8: Housing in the Smaller Villages**

Overall 52 people commented on this policy:

- Support 3
- Comment 5
- Object 44

The following key themes were identified in response to this policy:

- a) 500 homes is too high for the smaller villages;
- b) Smaller villages should play a greater role and deliver more housing, this is important to retain vitality and local services;
- c) The level of growth is an arbitrary percentage figure and has not been evidenced. The growth level should be based on capacity;
- d) The Local Plan should allocate sites in the smaller villages;
- e) Question delivery in the event of a NDP not making allocations or meeting full requirement;
- f) Lack of clarity over how windfalls are treated;
- g) Relationship with Policy H16 on infill should be clarified. Infill should not be limited to 5-6 houses, this is overly restrictive.

### **The Council's summary response to the main themes**

The Council is committed to helping all sized communities develop neighbourhood development plans, should they wish to. The decision not to allocate sites at the smaller villages is in accordance with this approach. The proposed policy approach is intended to support the community level of planning.

A reassessment of completions, commitments and windfall data has shown that windfall completions are likely to exceed previous expectations over the plan period, such that the 500 dwelling allocation requirement proposed by the Plan at smaller villages is no longer necessary to meet the housing requirement for the district. The primary evidence for this assessment is the SHELAA, which looks at development opportunities at the settlements and also analyses the role of windfall development.

It is anticipated that the level of development required will be achieved through windfall development which will achieve a growth of between 5 to 10% within the smaller villages. However, to support the neighbourhood level of planning where communities would like to direct growth to locations of their choosing, the policy will allow villages preparing neighbourhood plans to set out sites to achieve a minimum of five percent growth. This complies with the approach set out in NPPF 2018 Para 65 and 66, allowing communities scope to determine what they would like to achieve through their neighbourhood plan depending on the capacity for development in each village and the community's vision for their area.

Accordingly, the policy will be revised so that there is no longer a requirement for any of the smaller villages to accommodate growth, unless there is community commitment to achieving this through a Neighbourhood Development Plan.

### **The following changes will be made in response to the consultation:**

The policy will be re-written to support the allocation of sites at the smaller villages where proposed by neighbourhood development plans.

## **H9: Affordable Housing**

Overall 38 people commented on this policy:

- Support 4
- Comment 5
- Object 29

The following key themes were identified in response to this policy:

- a) There should be an uplift to the OAN figure to address affordability issues;
- b) Lack of evidence on the viability of the policy, especially considered in combination with other policies in the plan;
- c) Policy should include flexibility with regard to site viability;
- d) The requirement for affordable housing should be higher than 40%;
- e) The policy reference to 'at least' 40% delivery is ambiguous;
- f) A high proportion of the affordable housing should be retained for those with a local connection, this should include the shared ownership proportion;
- g) The tenure mix (75/25) should be more flexible, and should include affordable rent;
- h) Clarification is needed on how C2 units will be treated for the purposes of calculating affordable housing requirements;
- i) Affordable housing should be sought from smaller sites. Local need should not be overruled by Ministerial Statement;
- j) The Plan does not address how sites will contribute to Oxford's unmet affordable housing need.

### **Cherwell District Council, West Oxfordshire District Council and Oxford City Councils**

Express concern that our approach to meeting housing need would mean that Oxford's affordable housing needs will not be met.

### **Oxfordshire County Council**

There should be a commitment to work jointly with Oxford City Council to put in place arrangements for allocating affordable housing.

### **The Council's summary response to the main themes**

The housing requirement identified for the district includes an uplift which will help to address affordability issues. Viability testing on the affordable housing requirements has been undertaken in combination with other plan requirements, as required to justify the policy. An updated viability study will be prepared to test the viability of the revised Plan. Paragraph 5.42 of the Plan is clear that Policy H9 represents the starting point for affordable housing negotiations and that the exact amount of affordable housing on a site will be agreed through further negotiations between developers and the Council, supported by appropriate, specific viability evidence.

The allocation of affordable housing to individuals is outside of the remit of the local plan. However, the Council's housing allocation policy includes a target that, excluding rural exception sites and housing developed for particular client groups, that 20% of new build lettings are offered in the first instance to people with a strong local connection to that parish and who have a housing need as defined by the allocations policy (i.e. they are on the active Register).

The need to include affordable rent within the tenure mix is noted along with the need for flexibility within the tenure mix on each site. The policy and the supporting text in Para 5.42 will be amended accordingly. The policy has been amended to specify the development size at which affordable housing will be sought. This change will ensure that the policy may also be applied to C2 development that meets the threshold.

NPPF 2018 is clear, at Para 63 that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. In response to the consultation, the policy will be amended to seek a contribution to affordable housing from “minor” development of greater than five units within the AONB.

The published Plan did not identify specific sites to meet Oxford’s unmet need for housing. In response to the consultation and the publication of a Proposed Submission Plan by Oxford City Council during November 2018, which quantifies the level of further growth required to meet the requirements of the Oxfordshire Housing and Growth Deal, the Plan has been revised to include specific strategic allocations of land adjacent to Oxford for residential led development intended to help address Oxford’s development needs. In support of this revised approach, the policy for affordable housing requirements has also been revised to require 50% affordable housing within the allocations on the periphery of Oxford which will contribute to meeting the needs of Oxford for both market and affordable housing. This level of requirement is supported by the Oxfordshire SHMA.

**The following changes will be made in response to the consultation:**

- The policy will be amended to require a higher contribution to affordable housing on sites adjacent to Oxford;
- New wording will be added to the policy to prevent the artificial subdivision of sites to avoid affordable housing contributions;
- The supporting text will be amended to state that the tenure mix on each site will be agreed through negotiation with the Council but that the tenure mix set out in the policy will be the starting point for negotiation;
- The policy will be amended to include affordable rent. The policy will require 40% affordable rent and 35% social rent as the starting point for negotiations;
- The policy will be amended to clarify that sites of over 1000 square metres also need to contribute towards affordable housing (in line with NPPG).



## **H10: Exception Sites**

Overall 2 people commented on this policy:

- Support 0
- Comment 1
- Object 1

The following key themes were identified in response to this policy:

- a) The policy should refer to the role of neighbourhood development plans in respect of exception sites. Neighbourhood development plans should include policies to apply to developments on sites depending on their suitability.
- b) The policy is contrary to paragraph 54 of the NPPF as neither the policy nor supporting text refers to the potential need for some market housing to be included in the scheme to enable the delivery of this affordable housing. Having an exception sites policy that would prevent any market housing, including “low cost market housing” would likely lead to lower delivery of affordable housing overall. Policy H10 should be modified as follows to make it consistent with national policy: “Consideration will be given to allowing some market housing where this would facilitate the provision of additional affordable housing to meet local needs”.

### **The Council’s summary response to the main themes**

Individual neighbourhood development plans will need to determine whether to include specific policies for rural exception sites.

NPPF 2018 Para 77 notes that ‘Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.’ Officers have considered whether allowing market housing on exception sites would support further affordable housing delivery but, in view of the type of sites available for exceptional development within the district, officers are confident that exception sites can be brought forward on low cost land which will allow 100% affordable housing to be provided. This view is set out in paragraph 5.43 of the plan. Other policies within the plan will determine where market housing is appropriate.

### **The following changes will be made in response to the consultation:**

None

## **H11: Housing Mix**

Overall 36 people commented on this policy:

- Support 4
- Comment 8
- Object 24

The following key themes were identified in response to this policy:

- a) Lack of evidence to support the policy requirements, including viability assessment
- b) The nationally Described Space Standards should be a guide rather than a requirement. They are subject to review by central government.
- c) The SHMA is out of date and unreliable
- d) Policy H11, and the mix set out in table 5g, is too prescriptive and should be more flexible
- e) Housing mix should be led by local character and the market and on a site by site basis
- f) Housing need should be applied at a local, not a district, level
- g) The requirements (particularly that some homes should be marketed for 12 months to find an appropriate buyer) will impact on viability and deliverability, holding up delivery of housing.
- h) Lack of transitional arrangements

### **The Council's summary response to the main themes**

The requirements of policy H11 are evidenced by the Council's Housing Delivery Strategy 2018-2028. This includes the background paper 'Standards in new homes' prepared by Wessex Economics. The evidence in this report supports the case for around 15% of new homes being delivered to Category 2 standards, based on the proportion of older people expected in the population in 20 years-time and the incidence of long terms health problems and disabilities in the population.

Category 2 is equivalent to the now withdrawn Lifetime Homes standards. This is already being delivered in affordable housing in South Oxfordshire through implementation of the Core Strategy, which suggests that it is achievable and viable.

Viability testing on the national space standards has been undertaken in combination with other plan requirements, as required to justify the policy. An updated viability study will be prepared to test the viability of the revised Plan.

The Plan notes within both the policy and paragraphs 5.47 and 5.48, that the 2014 SHMA is the latest evidence for housing mix, and that it will be updated periodically. The policy and supporting text refer to the findings of the SHMA as a starting point for negotiations to help ensure that the current and future needs of households are supported by the housing mix within developments.

### **The following changes will be made in response to the consultation:**

Additional wording will be added to the third bullet point to clarify that plots should be marketed 'to an acceptable level' for a period of 12 months.

## **H12: Self-Build and Custom Housing**

Overall 16 people commented on this policy:

- Support 0
- Comment 2
- Object 14

The following key themes were identified in response to this policy:

- a) NDPs powers regarding development in smaller villages conflicts with plan objectives.
- b) Self-build inadequately provided for as an option.
- c) Reliance on the self-build register is insufficient. The Plan may over or underestimates the potential demand for self-build housing.
- d) Various suggestions for changes to the percentage of provision for self-build plots:
  1. Suggest increasing the percentage of provision for self-build plots to at least 6% on development sites of over 100 new homes;
  2. Suggest requirement for a 3% provision on all development sites of 100 or more new homes;
  3. Suggest requirement should be 20% of all allocations to comply with Government expectations and, by reserving serviced plots from allocated sites.
- e) Self and custom-built housing will be difficult to accommodate on strategic sites. Concern about conflicts, health and safety and issues between small plots out of the control of the major developer.
- f) Reservations regarding the reliance on large developers finding a solution to contribute to this sector where demand is for smaller sites.
- g) Where plots are not sold the policy should be clear as to when these revert to the developer.
- h) By restricting the requirement to strategic allocations, developers will be able to avoid providing self-build plots within other locations. After the words "On strategic allocations" add the words "and allocations in neighbourhood development plans".
- i) Better to identify smaller sites through Neighbourhood Plans to deliver self-build and custom-built housing.
- j) There is no onus on a neighbourhood planning group to help deliver self-build or custom housing. There is no expectation that NP groups can, or could, hold or control serviced plots or similar land they can dispose of for housing, which the scheme relies on.
- k) Facilitate individual self-build, this should be specified.
- l) In the absence of a viability assessment the policies listed should all include a viability clause.
- m) Housing mix policy should not apply to self-build plots.
- n) Park homes meet the aims of Policy H12 because an occupier designs a layout that suit needs.

### **The Council's summary response to the main themes**

The NPPF makes it clear that neighbourhoods should develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development. This includes the objectives of the plan.

Policy H12 is specifically referring to self-build and custom-build properties. The [Self-build and Custom Housebuilding Act 2015 \(as amended by the Housing and Planning Act 2016\)](#) provides a legal definition of self-build and custom housebuilding.

The intention to provide for self-build plots is supported by Policy H12 with a variety of means of delivery proposed. The 3% provision level set within the policy is reflective of the current available evidence from the self-build register. No evidence has been submitted to suggest any amendment to the 3% requirement and any site size thresholds to which it would relate to.

The Council's Register of Interest is monitored as part of the monitoring requirements of Policy H12. It is not possible to determine if the register is at any point under-presented because those with an interest are unaware of the existence of the register, or whether it is over-represented because those with an interest have registered, but perhaps do not have the means to implement a self-build. However, the register will continue to be the most effective way of capturing primary data in terms of demand for plots that is regularly available to the Council. The NPPG states "The level of demand is established by reference to the number of entries added to an authority's register during a base period" and "Relevant authorities with plan-making functions should use their evidence on demand for this form of housing from the registers that relate to their area in developing their Local Plan and associated documents."

It is not considered that the policy places too much emphasis on large developers; the policy states that sites will be identified in various way such as through NDPs, on strategic allocations and through individual proposals seeking planning permission.

The need for self-build plots is sought through the major allocations of the plan using terminology that is consistent with the Inspector's recommended approach at both East Devon and Cornwall Councils. The Plan's requirements are not considered to be comparatively onerous, with only a 3% contribution being sought through strategic allocations. The smaller plots that are required for self-build purposes can be provided within a larger site boundary with effective sub-division in the masterplanning of the site. It is unlikely that there will be unforeseen conflicts between housing types within a scheme which has been adequately masterplanned and subsequently granted planning permission. Where marketing of the plots is not successful, planning permission would expire and plots would expire without the plots being implemented. If a developer seeks further planning permission for an alternative use, the Council would need to consider the factors that led to the plots being unimplemented on that site.

The policy does not preclude NDPs identifying small sites for self-build; it encourages it. The first paragraph of Policy H12 would enable NDPs to bring forward sites for self-build by stating "Specific sites will be identified through Neighbourhood Development Plans". It would be rare for any NDP to hold or have control of any land identified within its plans, regardless of its intended use. NDPs would not be precluded from including allocations for self-build because they do not own the land in question.

Individual self-build is supported in the policy with reference to “proposals for self-build and custom build projects within settlements subject to there being no conflict with other policies in the Development Plan”. Any issues regarding individual plot design can be resolved through the planning application process. Policy H12 places no restrictions on size for self-build.

The viability assessment of the Plan will ensure that the 3% requirement from Strategic Sites is deliverable, without affecting the viability of the site. The policy accepts and is explicit that monitoring of various sources of evidence will be required to deliver this policy.

**The following changes will be made in response to the consultation:**

Additional text will be added to the policy to allow self-build plots to be developed for market housing on presentation of appropriate evidence that there is no market interest in the plots following an agreed period of marketing.

### **H13: Specialist Housing for Older People**

Overall 15 people commented on this policy:

- Support 3
  - Comment 3
  - Object 9
- 
- a) A viability study was not published alongside this version of the plan, therefore there has not been an assessment of the cumulative impact of both infrastructure requirements or wider policy requirements.
  - b) A specific emphasis should be placed on town centre locations which are ideally suited and the only genuinely appropriate location for this type of development.
  - c) The policy states that specific sites will be identified through NDPs. However, there are made NDPs such as Thame NDP which fail to make any provision for specialist housing for older people and many areas of the district which are not covered by a NDP. If there is no requirement for retirement housing in NDPs, it will only exacerbate the delivery of this much-needed housing. Can retirement developments still come forward on sites in locations not covered by a NDP? The NPPG states that housing for older people is 'critical', therefore object to the overly prescriptive wording of this policy which expects provision for such housing to be made through NDPs. There should be flexibility in the provision of this specialist housing and NDPs should be one mechanism for identifying sites.
  - d) The approach of allowing NDPs to allocate sites for specialist housing for older people is in line with the localism agenda, however a minimum of 100 units is required to create economies of scale and a viable community. NDPs are unlikely to allocate a single site for development of 100 units. A more strategic approach by the council is required in order to identify broad areas where such developments would be appropriate.
  - e) Unrealistic to assume that the level of need of specialist housing for older people can be secured through the strategic allocations. Also, imprecise as provides no detail as to what is meant by 'larger sites' or what forms of accommodation would fulfil this aspiration.
  - f) The 2014 SHMA only specifies a county wide target in terms of specialist housing for older people. A local target for delivery needs to be set rather than over reliance on NDPs and strategic allocations.
  - g) Extra Care provision meets the needs of older people better than residential care in that it offers an element of independent living and should be sufficiently supported.
  - h) There needs to be an enormous increase in the proportion of the general housing supply which is suitable for housing. No evidence in that the Plan has considered benefits of community-led housing or community land trusts which would extend the choice and deliver a variety of housing.
  - i) The role of park homes in providing specialist housing for older people has been ignored in the Plan. Developers are reluctant to provide bungalows for older people and if the Local Plan is to realise its goal of achieving reasonable provision of housing for older people, this type of provision needs consideration.

### **Thame Town Council**

The current Housing Strategy is inadequate in its detail. Should cover not just demand by type but the tenure. As the policy is currently written, it would prevent any of the market towns or villages from introducing a local occupier clause of any type. Thame feels this is another example of where the Town Council should work with neighbouring parishes, including those in Buckinghamshire in order to understand the needs of the older populations of these areas and how to prevent sections of the community from being frozen out of suitable accommodation. Policy H13 should be amended to “Specific sites and types of accommodation will be identified through NDPs”.

### **Watlington Neighbourhood Plan community forum**

The policy is limited to specialist sites and the larger strategic sites. This limit is too restrictive to meet the needs of older people in the community. There should be a fixed percentage of homes built to a specification of Homes for Life on all development sites greater than 100 units.

### **The Council’s summary response to the main themes**

Viability assessment of the plan is ongoing alongside the development of the plan. The viability study will assess the cumulative impacts of infrastructure and wider policy requirements, although Policy H13 does contain a clause which states that on larger strategic sites, *“this will be subject to the local need identified and the viability of individual sites”*.

Any application submitted will be assessed on its merits and with other relevant policies in the Local Plan. Town centres can offer residents excellent access to goods and services. Housing within existing built up areas of towns is supported by Criterion ii of Policy H1: Delivering new homes, and the retention of residential development in town centres is supported by Policy H22: Loss of Existing Residential Accommodation in Town Centres.

The Plan includes flexibility in the policy to ensure that the Council’s housing strategy will be used to identify appropriate locations for development. The specific sites will be identified through neighbourhood plans as specified in Policy H1: Delivering new homes. Where housing need for older people has been demonstrated, it may also be permitted at Strategic Allocations and smaller sites allocated by the plan. It is not considered that the reference to “larger strategic sites” imprecise, in this context it describes sites where a significant amount of growth is proposed. The Council’s housing strategy will also help to inform the type of specialist housing that would be required in a particular area.

A district level target for the amount of specialist housing for older people is not set by the Plan, though delivery does contribute to the county wide needs established by the Strategic Housing Market Assessment (SHMA) 2014. As such, the delivery can be monitored but the measurement will be at a more strategic level. There is no evidence available to justify a specification that a fixed percentage of homes should be built to the Homes for Life specification on all development sites greater than 100 units.

It is acknowledged that community-led housing or community land trusts may extend the choice and deliver a variety of housing, however, this must be tempered by viability evidence to ensure that the level of market housing proposed on such schemes would be sufficient to sustain affordable housing.

Park homes are not considered to be specialist homes as they can be purchased by anyone. Sites for park homes will be considered through the development management process and any planning application would be treated on its own merits in conjunction with other relevant policies in the plan.

It is acknowledged that the Housing Strategy contains a limited amount of detail, however, it has been informed by several detailed background papers produced by Wessex Economics on behalf of both South Oxfordshire and Vale of White Horse district councils. These papers have been published on both councils' websites and include Background Paper 4: A Profile of the South and Vale Housing Market, Needs and Opportunities. This background paper refers to tenure as one of the key indicators (as well as type and size, and price and affordability) and how they affect the nature of the housing required. In addition, paragraph 5.64 of the emerging Local Plan indicates how Policy H13 could be implemented; there is no tenure restriction in the wording of the policy.

**The following changes will be made in response to the consultation:**

None.



## **H14: Provision for Gypsies, Travellers and Travelling Showpeople**

Overall four people commented on this policy:

- Support 1
- Comment 2
- Object 1

The following key themes were identified in response to this policy:

- a) The number of pitches for Chalgrove should be reduced;
- b) Sites should be located where there is proven need;
- c) Further guidance on site specifications of pitches should be provided.

### **Historic England**

An additional criterion to protect the significance of heritage assets should be included within the policy.

### **The Council's summary response to the main themes**

The need for pitches in South Oxfordshire is evidenced through the Gypsy and Traveller Accommodation Needs Assessment.

National guidance on site requirements has been withdrawn but the criteria based element of the policy has been refined in response to the consultation.

### **The following changes will be made in response to the consultation:**

Additional wording to be added to criteria iii) to ensure the protection of heritage assets.

Inclusion of additional requirements for safe vehicle movements within sites.

### **H15: Safeguarding Gypsy, Traveller and Travelling Showpeople Sites**

No responses to this policy were received:

**The following changes will be made in response to the consultation:**

None

## **H16: Infill Development**

Overall 12 people commented on this policy:

- Support 2
- Comment 1
- Object 8

The following key themes were identified in response to this policy:

- a) Wording could lead to inappropriate development particularly in Green Belt villages.
- b) Density of infill in smaller villages should be consistent with surrounding housing density.
- c) For a site to be infill it must front or at least have direct access to an Adopted Highway.
- d) There is no evidence that this restrictive policy approach to acceptable sites in smaller villages will deliver the minimum of 500 new homes the policy requires. The supply of such sites in the built-up area of smaller villages is finite. October 2017 SHEELA does not comply with the requirements of policy H16, meaning the SHEELA is not a reliable evidence base to support delivery of a minimum of 500 new homes through policy H8.
- e) No expectation of supply is expected from small villages yet on past completion rates some 90 dwellings a year can be expected. Make specific and realistic assumptions about the capacity of small sites to make a positive contribution to OAN.
- f) Waterstock is an unlisted settlement unsuitable for development.
- g) Garsington has limited opportunities for infill development. Allocation of a site in or on the edge of the village is more likely to be an effective means to secure new housing (including affordable).

## **Historic England**

Would like to see 'historical' added to 'public, environmental or ecological value' in Policy H18 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.

### **1. The Council's summary response to the main themes**

The description of infill set out in the supporting text at Para 5.73 makes it clear that it is considered to be 'frontage' development. Such infill sites would be windfall sites and capable of coming forward and contributing to supply. The effect of access concerns in relation to infill development have been considered and have referred to this at paragraph 5.76.

Where infill sites are within a settlement washed over by the Green Belt then Green Belt policy would continue to apply. Criteria iii has been included within the policy to ensure that other policies in the plan, such as Green Belt and density are considered when a proposal that is relevant to Policy H16 is determined.

It is considered that criteria iii will provide sufficient assurance of the protection of historic assets. The criterion includes reference to compliance with the remaining policies in the Plan, which contains a suite of heritage policies sufficient to ensure that historical value is protected in these circumstances.

Windfall sites are capable of coming forward and contributing to supply as suggested in Policy H8. Windfall completions are monitored annually for their contribution to supply and it is noted in the response to Policy H8: Housing in the Smaller Villages, that the contribution to the housing land supply of windfall development has been reviewed and that there is no longer a requirement for the smaller villages to allocate sites to meet the district's development needs.

**The following changes will be made in response to the consultation:**

Historic value will be added to the list of considerations.

## **H17: Sub-division and Conversion to Multiple Occupation**

Overall 3 people commented on this policy:

- Support 2
- Comment 1
- Object 0

### **The following key themes were identified in response to this policy:**

- a) Plan misses the obvious connection between policies increasing the number of dwellings through sub-division and those based on an assessment of newbuild. Parking should not be a concern given the prevalence of two (and three) car households outside of any planning control. All new houses of more than 2 bedrooms should be designed to be easily and cheaply sub-divided at a later date.
- b) Excellent policy will produce homes and allow downsizing without having negative impacts on greenfield land. Policy could be strengthened with help such as advice and grants from the Council for a splitting of homes that may be daunting for many citizens. It should be coupled with the opportunity to aid householders in retrofitting homes for energy efficiency.
- c) Suitably supportive of sub-divisions and acknowledge the contribution that can be made to the supply of smaller dwellings without referring to the reduction in the unsustainable levels of under-occupation.

## **Historic England**

Welcomes and supports criterion iii).

### **The Council's summary response to the main themes**

The general support for this policy is noted. Where a homeowner wishes to subdivide a property, it is likely to generate a need for further parking provision because of the multiple occupation that will occur, therefore the policy requirements are not unreasonable.

There is no evidence for the Plan to prescribe the need for new housing to be adaptable for future subdivision, this is considered to be too onerous as a requirement. In addition, Paragraph 126 of NPPF 2018 states that design codes should be used but that "...their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be just."

While further information may help to promote sub division opportunities available to home owners, this Local Plan policy and its supporting text sets out to explain the appropriate provisions that sub division would need to satisfy. It is not considered that the district development plan would be a suitable medium to promote the assistance available.

### **The following changes will be made in response to the consultation:**

None.

## **H18: Replacement Dwellings**

Overall 5 people commented on this policy:

- Support 0
- Comment 1
- Object 4

The following key themes were identified in response to this policy:

- a) The best buildings should be actively preserved. Guidance from local parish councils, NDPs or CLPs should be sought on the value of individual pre-1940 buildings at planning application stage prior to demolition.
- b) The policy should contain design advice, particularly with regard to appropriate design in the Chilterns AONB.
- c) The assessment criteria to ENV12 should be changed. Additional criteria of noise and vibration should be included in the policy.
- d) Specific guidance is required for intensification on small plots especially where development would impact on the ambience of the street scene.
- e) The term 'materially larger' requires definition.
- f) Replacement buildings should be situated at the same location as the building that it replaces and not hundreds of meters away on the same plot.
- g) The policy should look at the overall cumulative impact of the development to stop applications being split into seemingly innocuous parts.

### **The Council's summary response to the main themes**

The plan should be read as a whole; it is not necessary to repeat policy within H16. It is considered that the suite of heritage policies provide adequate protection for heritage assets of value, that the design policies DE1 to DE10 as well as the South Oxfordshire Design Guide provide adequate guidance to ensure good design in the district and that policy ENV12 provides adequate protection from noise and vibration generated by new development.

Local parish councils, NDPs or CLPs are very welcome to make their views known where buildings are proposed for demolition.

Policy H18 only applies where there is the replacement of one dwelling with another, rather than more than one. The supporting text sets out the specific restrictions in terms of size to ensure compliance with the aim of the policy. The policy applies to the whole district, but other policies in the plan including those for design and managing impact on the AONB may be relevant to individual decisions. Reference to the conservation of the natural beauty of the area within the AONB is made within the supporting text to the policy.

The location of a replacement dwelling within a plot will be guided by other policies within the plan, particularly the suite of design policies and policy STRAT6: Green Belt which aims to maintain the openness of the Green Belt. Incremental applications will be assessed by the decision maker since the cumulative impact of extant permissions is a material consideration when an application is determined. However, each planning application must be determined on a case by case basis based on its own merits, because individual circumstances apply to each site. The policy sets a specific threshold for a maximum increase in volume within the Green Belt, but outside of the Green Belt the impact must be judged on the merits of the application.

**The following changes will be made in response to the consultation:**  
None.

**H19: Re-use of rural buildings**

Overall 3 people commented on this policy:

- Support 1
- Comment 0
- Object 2

The following key theme was identified in response to this policy:

The last part of the policy is not compliant with para 55 of the NPPF and should be removed.

**Historic England**

Supports the policy.

**The council's summary response to the main theme**

The last part of the policy will be revised to comply with the NPPF.

**The following changes will be made in response to the consultation:**

The policy will be revised in accordance with NPPF 2018.



## **H20: Rural Workers' Dwellings**

Overall 3 people commented on this policy:

- Support 0
- Comment 1
- Object 2

The following key theme was identified in response to this policy:

The Plan should be more pro-active in meeting the demand for new agricultural/forestry dwellings close to towns and villages

### **The Council's summary response to the main themes**

This policy is intended to guide the development of dwellings that are needed within the countryside to support a particular rural activity. By definition these needs cannot be met in towns and villages.

### **The following changes will be made in response to the consultation:**

None

## **H21: Extensions to Dwellings**

Overall 1 person commented on this policy:

- Support 0
- Comment 0
- Object 1

The following key theme was identified in response to this policy:

Extensions to houses should be resisted, we need smaller homes.

### **The council's summary response to the main theme**

The policy complies with national policy. Resisting extensions would not contribute to sustainable development.

### **The following changes will be made in response to the consultation:**

None.

## **H22: Loss of Existing Residential Accommodation in Town Centres**

No responses to this policy were received.

### **The Council's summary response to the main themes**

None

## Chapter 6: Employment and Economy

### **EMP1: The amount and distribution of new B-class employment land**

Overall 45 people commented on this policy:

- Support 3
- Comment 7
- Object 35

The following key themes were identified in response to this policy:

- a) The major sites for employment are contrary to the NPPF in terms of minimising journey lengths for employment.
- b) Additional sites should be added. Insufficient deliverable employment land has currently been identified.
- c) The allocations do not align with the evidence.
- d) Sites should be apportioned more effectively.
- e) Question the emphasis on offices.
- f) The policy overstates possible employment options at Monument Business Park.
- g) Correction of the name of “Harwell Oxford” to “Harwell Campus”. Paragraph 6.5 states that CSC specialises in “fusion research, and hosts related enterprises”. It has a much wider base, and currently hosts a number of high-tech research and development activities in energy, materials and robotics as well as commercial technology organisations.

### **The Council’s summary response to the main themes**

The proposed areas for employment are throughout the district at allocated strategic sites, Science Vale and Didcot. The Plan also directs employment development to the market towns and larger villages with specific locations to be identified through the Neighbourhood Plan process. These proposals are considered to align housing and employment growth in accordance with the spatial strategy for the district.

The primary evidence base for determining the amount of employment land required over the plan period is The South Oxfordshire ELR Addendum (SOELRA) 2017. The allocations proposed within the plan align with the SOELRA which supplements the findings of the 2015 Employment Land Review (ELR). The SOELRA translates the economic forecasts used in the Oxfordshire SHMA 2014 into an area of employment land needed in the district for the period 2011 to 2033. The SOELRA 2017 forecasts net additional demand of employment land from 2011 to 2033 in South Oxfordshire of between around 19 and 35.9 hectares, with the higher figure relating to committed/planned economic growth, as supported in the Strategic Housing Market Assessment and the Strategic Economic Plan. The figures are comparable with those of the 2015 ELR although slightly higher due to the use of a refined methodology of examining both labour demand and local labour supply, using up to date job density ratios and plot ratio assumptions.

Policy EMP1 proposes to facilitate the provision of B-class jobs, which included office, manufacturing and distribution jobs. The Plan has not placed a particular emphasis on the delivery of B1, office jobs but has used the evidence to stipulate the type of development which needs to be accommodated in each location.

The 2015 ELR found that there is an opportunity to expand Monument Business Park. It was found to be a very successful location for office use, particularly in providing affordable and flexible space to accommodate the growth of Small and Medium Sized Enterprises. Vacancy was observed to be relatively low during the site survey, with high value occupiers attracted to the excellent public realm and good quality stock. In consideration of this evidence, the Plan proposes that the site is suitable for expansion to help meet additional demand for employment floorspace in rural area and the strategic allocation at Chalgrove airfield can assist with the business parks extension.

The mistake with reference to Harwell Campus is noted. This will be corrected and additional wording included within the site description.

**The following changes will be made in response to the consultation:**

- The references to “Harwell Oxford” will be changed to “Harwell Campus”.
- Reference to the activities undertaken by CSC will be included in the supporting text.
- B Class uses will be defined within the glossary.

## **EMP2: Range, Size and Mix of Employment Premises**

Overall 4 people commented on this policy:

- Support 2
- Comment 1
- Object 1

The following key themes were identified in response to this policy:

- a) The policy conflicts with Permitted Development Rights.
- b) The decision to seek a range of sizes of employment premises and encouraging proposals for premises suitable for small and medium sized businesses is supported.

### **Homes and Communities Agency**

More flexibility should be inserted into the policy.

### **The Council's summary response to the main themes**

It is considered that the comment regarding Permitted Development Rights is more appropriately considered with reference to Policy EMP3: Retention of Employment Land.

It is considered that flexibility is provided within this policy; the inclusion of the word "encourage" does not eliminate other forms of employment.

The support for the policy is noted.

### **The following changes will be made in response to the consultation:**

None.

### **EMP3: Retention of Employment Land**

Overall 5 people commented on this policy:

- Support 2
- Comment 1
- Object 2

The following key themes were identified in response to this policy:

- a) Specific criterion should be included whereby the loss of employment is outweighed, i.e. affordable housing.
- b) Market factors alone should be the criteria required within this policy, not the latter two criteria.
- c) A distinction should not be made between B Class uses and other employment.

### **The Council's summary response to the main themes**

In compliance with NPPF 2018 Para 11a it is considered that the inclusion of criteria to support the loss of employment would be negative. It is not considered that market factors alone are a sound basis for consideration of the loss of employment space within the district. This is supported by NPPF 2018 Para 81.d. The Employment Land Review 2015 supports the need for B Class Use employment land to be retained.

### **The following changes will be made in response to the consultation:**

None

**EMP4: Employment Land in Didcot**

No responses to this policy were received.

**The Council's summary response to the main themes**

None



### **EMP5: New Employment Land at Henley-on-thames**

Overall 1 person commented on this policy:

- Support 0
- Comment 0
- Object 1

The following key theme was identified in response to this policy:  
Specific sites should be allocated.

### **The Council's summary response to the main themes**

The Council is committed to helping all sized communities develop neighbourhood development plans, should they wish to. The proposed policy will help to support the community level of planning. The proposed devolution of plan making function to Neighbourhood Development Plans is an innovative approach which is fully supported by NPPF 2018 Para 29 which requires neighbourhood plans to allocate sites to deliver the amount of development required by the local plan.

Contingency wording will be added to the policy to ensure that where Neighbourhood Development Plans have not adequately progressed with allocating sites, planning applications for employment will be supported in accordance with Policies EMP1 and STRAT1.

### **The following changes will be made in response to the consultation:**

Inclusion of contingency wording to address lack of allocation progress within Neighbourhood Development Plans.

## **EMP6: New Employment Land at Thame**

Overall 3 people commented on this policy:

- Support 0
- Comment 0
- Object 3

The following key themes were identified in response to this policy:

- a) The evidence should be based on the potential of sites. It is the potential of these developments to accommodate employment that is important, not the addition or loss of employment land or floorspace per se.
- b) The Council should liaise with Thame Business Forum to fully understand the availability of land to meet Thame's economic needs.

### **Thame Town Council**

The Town Council wishes to locally evidence its own employment allocations through its neighbourhood plan, which are considered to be in excess of the level proposed by the District. This is especially important in order to achieve the 8% vacancy rates for employment space recommended by the ELR to permit efficient churn of employers.

### **The Council's summary response to the main themes**

The appropriate allocations for Thame will be considered via the Thame Neighbourhood Plan Review. If evidence can be provided that supports allocations in excess of the amount stated in policy EMP6, an Examiner will determine its appropriateness. Thame Neighbourhood Steering Group will need to consult/liaise with the appropriate bodies/organisations to achieve this.

### **The following changes will be made in response to the consultation:**

None

## **EMP7: New Employment Land at Wallingford**

Overall 1 person commented on this policy:

- Support 0
- Comment 1
- Object 0

The following key theme was identified in response to this policy:

Question the reliance on the Wallingford Neighbourhood Plan to allocate appropriate sites. This should not be the sole mechanism stated within the policy.

### **The Council's summary response to the main themes**

The Council is committed to helping all sized communities develop neighbourhood development plans, should they wish to. The proposed policy will help to support the community level of planning. The proposed devolution to Neighbourhood Development Plans is an innovative approach which is fully supported by NPPF 2018 Para 29 which requires neighbourhood plans to allocate sites to deliver the amount of development required by the local plan.

Contingency wording will be added to the policy to ensure that where Neighbourhood Development Plans have not adequately progressed with allocating sites, planning applications for employment will be supported in accordance with Policies EMP1 and STRAT1.

### **The following changes will be made in response to the consultation:**

Inclusion of contingency wording to address lack of allocation progress within Neighbourhood Development Plans.

## **EMP8: New Employment Land at Crowmarsh Gifford**

Overall 1 person commented on this policy:

- Support 0
- Comment 1
- Object 0

### **The Ministry of Defence**

This office needs to be consulted at application stage to ensure this would not infringe aerodrome obstacle limitation surfaces. The above site also falls within the statutory birdstrike safeguarding consultation zone surrounding RAF Benson. Therefore, we need to be consulted on SUDs schemes, open water bodies, wetland habitat, refuse/landfill sites etc. as these types of development have the potential to attract large and/ or flocking bird species hazardous to air traffic safety.

### **The Council's summary response to the main themes**

The comment from the MOD is noted, however this is not of relevance to the local plan process. In the event that a planning application is submitted, the necessary consultation procedure will be carried out.

### **The following changes will be made in response to the consultation:**

None.

### **EMP9: New Employment Land at Chalgrove**

No responses to this policy were received.

### **The Council's summary response to the main themes**

None

## **EMP10: Community Employment Plans**

Overall 2 people commented on this policy:

- Support 1
- Comment 1
- Object 0

The following key themes were identified in response to this policy:

- a) Oxfordshire Local Enterprise Partnership supports the soundness of the Local Plan in relation to Policy EMP 10: Community Employment Plans.
- b) The policy should make a provision for market gardens.

### **The Council's summary response to the main themes**

The support of the Local Enterprise Partnership with regard to Community Employment Plans is noted.

It is not considered that the inclusion of market gardens within the policy is appropriate.

### **The following changes will be made in response to the consultation:**

None.

## **EMP11: Development in the Countryside and Rural Areas**

Overall 4 people commented on this policy:

- Support 0
- Comment 1
- Object 3

The following key themes were identified in response to this policy:

- a) There is no recognition of the agriculture sector. The needs and benefits of small-scale agriculture have not been investigated.
- b) Sensitivity should be given to the types of business that are supported and encouraged as there is limited public transport.
- c) The policy is too permissive. It makes no reference to conserving and enhancing the AONB and it is unclear whether the approach in the AONB or its setting would be any different to elsewhere in the district. The Policy needs amending to ensure that only proposals which are compatible with and appropriate to a rural location in the AONB are permitted.

### **The Council's summary response to the main themes**

It is considered that the policy is in compliance with NPPF 2018 Para 83 and that the wording will allow an appropriate planning balance to be taken which will result in appropriate development that is sensitive to the rural surroundings. It is not considered that specific reference to the agriculture sector is necessary.

The plan is intended to be read as a whole. Other policies in the plan are intended to provide protection for the AONB and its settings. It is considered that Policy STRAT1, ensures sufficient protection of the AONB in combination with Policy ENV1.

### **The following changes will be made in response to the consultation:**

None

## **EMP12: Tourism**

Overall 1 person commented on this policy:

- Support 0
- Comment 0
- Object 1

The following key themes were identified in response to this policy:

The Chinnor and Princes Risborough Railway should be recognised under the Policy ENV6: Historic Environment or under the EMP12: Tourism in the absence of the retention of Policy T6 of the Core Strategy. Chinnor & Princes Risborough Railway Association should be specific consultees under the SCI.

### **The Council's summary response to the main themes**

Chinnor and Princes Risborough Railway Association is included on the Council's consultation database as a "general consultation body" but the association does not constitute a specific consultation body under the Town and Country Planning (Local Planning) (England) Regulations 2012.

It is not the intention of Policy EMP12 to recognise individual attractions within the district, to do so would require the maintenance of an exhaustive list which could change during the plan period. Instead EMP12 is intended to guide tourism development to locations which support the spatial strategy. It is considered that the final paragraph of the policy as drafted would apply to Chinnor and Princes Risborough Railway as it supports "small-scale development to support the visitor economy".

### **The following changes will be made in response to the consultation:**

None



**EMP13: Caravan and camping sites**

No responses to this policy were received.

**The Council's summary response to the main themes**

None

#### **EMP14: Retention of Visitor Accommodation**

No responses to this policy were received.

#### **The Council's summary response to the main themes**

None

## **Chapter 7: Infrastructure**

### **INF1: Infrastructure Provision**

Overall 25 people commented on this policy:

- Support 4
- Comment 7
- Object 14

The following key themes were identified in response to this policy:

- a) The plan needs to take into account cross border infrastructure matters, particularly education and transport;
- b) The plan should provide further detail on infrastructure requirements linked to strategic sites, e.g. through more detailed planning documents;
- c) The plan should ensure that infrastructure improvements associated with development are provided up front;
- d) The plan needs to take account of power lines and gas pipes when designing and planning developments in line with national guidelines.

### **Aylesbury Vale District Council**

Include a reference in the duty to cooperate statement to transport forecasting work, and the A418 roundabout work.

### **Buckinghamshire County Council**

Note the need to need to continue to work with OCC on schools planning, given cross border movements of pupils.

### **Oxfordshire County Council**

Will provide updates on costs in the IDP, otherwise it is considered that it could impact on viability, and are in general concerned that the money from S106 for schools and transport may not come forward if sites only pay CIL towards these measures.

### **Reading Borough Council**

Development close to Reading will need to look at education capacity on both sides of the border.

### **Wycombe District Council**

Supports intentions of INF1

### **Great Haseley Parish Council**

The Council is concerned regarding the timely delivery of planned infrastructure to support the plan proposals and the lack of detail on viability. The constraints on infrastructure and impact on the environment associated with new housing development means that there is a need for investment in roads, education and health care upfront as new housing is built.

### **Education and Skills Funding Agency**

Suggest further detail be outlined regarding planning for schools, including a schools topic/ background paper, and if possible a Schools Planning DPD (as was produced by the London Borough of Ealing), to set out where schools need to expand, or new schools providing, including safeguarding land where relevant.

### **Homes and Community Agency**

Supports position of exempting Chalgrove from CIL payments, with infrastructure costs to be paid through S106

### **National Grid**

Development needs to be planned appropriately around power lines, in accordance with the guidelines, 'A sense of place' as best practice to address urban design issues around power lines. Powerlines cannot normally be re-located. Ensure that due account of 'High Pressure Major Accident Hazard Pipelines' (gas pipes) is taken when planning for growth.

### **Scottish and Southern Energy Power Distribution (SSE)**

Concern regarding conditions requiring removal of overhead power lines, which are considered ultra-virid. A condition prohibiting development until such time as the developer has reached agreement with the Distribution Network Operator (DNO) (a) as to how the development can be laid out such that the line(s) can be retained in their current position or (b) such that contractual arrangements have been agreed to modify the overhead lines should be included in the Plan. It is for Planning Authorities to consider how best to achieve this when land is first being considered for development. For example, it may be that Planning Authorities consider imposing conditions on developers requiring them to conclude arrangements for modifying the existing overhead lines before submission of their Planning Application or prior to any planning permission being granted.'

### **UK Atomic Energy Company**

Concerns regarding lack of bus services to Culham.

### **The Council's summary response to the main themes**

The update to the Infrastructure Delivery Plan has been undertaken in consultation with Oxfordshire County Council. The updated Infrastructure Delivery Plan has provided more detail on education and transport matters. The findings of, and assumptions made by the update, will be done in parallel to the updated viability report and where appropriate, will be incorporated into the revised Plan.

A cross border memorandum of understanding for transport has been agreed between Buckinghamshire and Oxfordshire County Councils.

The concerns expressed regarding the provision of infrastructure in a timely manner are noted. The infrastructure associated with each strategic development is covered in each policy and the IDP, but at an appropriate level of detail to demonstrate reasonable delivery. NPPF 2018, para 34 notes that: 'Plans should set out the contributions expected from development. Such policies should not undermine the deliverability of the plan.' The full detail of what infrastructure is required to be delivered will be agreed at planning application stage, this will include negotiations on required infrastructure and viability.

At this stage of plan preparation, the requirement is to show how the infrastructure required to support the plan as a whole can be funded in accordance with NPPG Paragraph: 055 Reference ID: 61-055-20180913, which states that "The government

recommends that when preparing a plan strategic policy-making authorities use available evidence of infrastructure requirements to prepare an Infrastructure Funding Statement. This should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination, this can be used to demonstrate the delivery of infrastructure throughout the plan-period.”

Where possible infrastructure will be phased alongside development to ensure that new developments have the services and facilities they need on site, or have access to facilities nearby. The Council will collect funds through the Community Infrastructure Levy and these will be used to mitigate against the impacts of development and to provide new facilities e.g. schools, improvements to public transport links etc. Officers will continue to work with stakeholders and external providers to achieve this.

The policy will be revised to include further guidance on power distribution matters and a clause will be added to the revised policy to ensure that development takes account of existing infrastructure in proposals.

**The following changes will be made in response to the consultation:**

The policy will be revised to require development proposals to take account of existing infrastructure such as electricity pylons or gas pipelines and to require early engagement with infrastructure providers to ensure any costs associated with changes are agreed at application stage.

## **TRANS1: Supporting Strategic Transport Investment**

Overall 54 people commented on this policy:

- Support 7
- Comment 6
- Object 41

The following key themes were identified in response to this policy:

- a) Concerns regarding current evidence on infrastructure matters, particularly in relation to the main strategic sites;
- b) Comments on cross border transport matters and the need to reference more specifics of possible mitigation schemes/ traffic impacts, as well as concern about impacts-e.g. proposed Reading bridge;
- c) Concerns regarding the proposed expressway and the lack of detail on implications;
- d) Concerns regarding the lack of focus on sustainable transport improvements, and the need for more detail on buses etc;
- e) The latest NIC report on the Ox-Cam arc should be referenced;
- f) Land to the North of NE of Didcot can help to deliver the Culham to Didcot crossing.

### **Chilterns Conservation Board**

Point v) should be removed. The Board objects to delivery of a new Thames Crossing due to potential traffic impacts on the Chilterns.

### **Highways England**

Note that any additional sites will need appropriate cumulative assessment of highway impacts. Agree that further clarity on preferred Expressway options is needed before any conclusions can be drawn on links to proposed development and that impacts/ benefits on SODC will depend on the route of the road.

### **Oxford Bus Company**

More detail on proposed bus service improvements is required.

### **UK Atomic Energy Authority**

Support the policy.

### **Aylesbury Vale District Council**

Further reference to the Expressway proposal, and the impact on the growth strategy in the Thame/ Wheatley area should be included in the plan.

### **Buckinghamshire County Council**

Support continued engagement on cross-border transport matters.

### **Reading Borough Council**

A specific reference to park and ride provision on main road corridors into Reading including the A4074, A4155 and B481 should be included within the plan.

### **Oxfordshire County Council**

Further Evaluation of Transport Impact work to be carried out, to feed into an updated IDP, and Regulation 123 list. Lack confidence in delivery of strategic sites, particularly Chalgrove, based on the current evidence.

#### **West Berkshire Council**

Concern regarding the traffic impacts on the A34 from growth, and potential impacts from developments in Goring.

#### **Wycombe District Council**

General support for the policy and the proposals for continued crossing border working on matters such as M40 impacts.

#### **Baldons Parish Council**

Major concerns regarding the impact of the Oxford and Cambridge Expressway. The language relating to the Expressway highlights the potential benefits and implies support for a southern route option. Such a route would damage the village and others in South Oxfordshire. The local plan will need revision if a southern route is chosen and this should be reflected in the text.

#### **Ewelme Parish Council**

The plan lacks commitment to highway infrastructure improvements. Traffic impacts of the proposed development on surrounding village has not been addressed. Neighbourhood Plans should not address these issues; this should be addressed by County Highways.

#### **Great Haseley Parish Council**

The District Council should continue to oppose an additional river crossing at Reading. The implication to all villages and junctions between the proposed bridge and at least the M40 need to be considered as a whole.

#### **Harpsden Parish Council**

The plan should elaborate on the proposed Oxford to Cambridge expressway. The proposed growth corridor has huge implications for the district but is only given a brief mention.

#### **Kidmore End Parish Council**

Strongly opposed to a new Thames Crossing as this will increase traffic in South Oxfordshire and have a detrimental effect on local villages, the countryside and AONB. Other means of traffic control need to be considered, such as increased cycling routes, park and ride and restrictions on lorries and encouraging greater use of the M4 motorway and A34.

#### **North Moreton Parish Council**

The plan should elaborate on the proposed Oxford to Cambridge expressway. The District Council should oppose both of the proposed routes south of Oxford, the routes are contrary to plan objectives 7.1 and 7.2.

#### **Waterstock Parish Meeting**

The plan should elaborate on the proposed Oxford to Cambridge expressway. The proposed growth corridor has huge implications for the district but is only given a brief

mention. The plan is unsound unless it lays out the implications and consequences as presently known and shows that these have been taken into account in plan-making.

### **Watlington Parish Council**

The statement in TRANS1 (v) is very weak and in particular does not mention the distance into South Oxfordshire over which any traffic and environmental impacts of those measures do not result in an adverse impact.

### **The Council's summary response to the main themes**

Officers are working with the statutory bodies to ensure that infrastructure requirements are addressed by the plan. Memoranda of Understanding (MOU) are being prepared to ensure that our work with these bodies is clearly documented. Cross border matters will be addressed through MOUs with adjacent authorities/statutory bodies. Matters related to the Strategic Road Network have been covered in the signed MOU with Highways England. Matters related to more local transport issues will be addressed by the MOU with Oxfordshire County Council.

Oxfordshire County Council is committed to exploring the options for the provision of a new Thames river crossing near Reading as set out in Local Transport Plan 4 (2015), more technical work is needed to justify the safeguards for this route.

The detail of infrastructure requirements for individual sites is being reviewed with Oxfordshire County Council through the Infrastructure Delivery Plan. This will satisfy the requirement of NPPF 2018, para 34; it will not provide the level of detail required to support individual planning applications. Officers will continue to work positively with site promoters and Oxfordshire County Council to develop more detail on infrastructure matters associated with strategic sites, including sustainable transport proposals.

It is unlikely that clarity on the route of the proposed Expressway will be available for some time. The expression of the choice of corridor still leaves a decision on the routing of the road to the north west or south east around Oxford to be taken and public consultation on the proposed route will need to take place before the decision is made. This is likely to be announced during 2020. The Expressway itself will be subject to a public examination. Until there is further certainty about the route of the Expressway its impacts cannot be considered by this local plan. However, the Council has been pro-active in its response and will include a new policy within the revised Plan committing the authority to working with Network Rail, Highways England, the National Infrastructure Commission, the County Council and others bodies to understand the impacts and plan for the provision of both the Expressway and East West rail.

The proposed provision of strategic allocations of land adjacent to Oxford in the revised Plan will mean that the Council will need to work with other bodies to support sustainable transport measures that improve access to/from proposed major development around Oxford. The commitment to this joint working will be included in the policy.



**The following changes will be made in response to the consultation:**

- A new policy committing the authority to working to understand the impacts and plan for the provision of both the Expressway and East West rail will be included in the revised Plan.
- A commitment to joint working to support sustainable transport measures to improve access to/from proposed major development around Oxford will be included in the revised policy.

## **TRANS2: Promoting Sustainable Transport and Accessibility**

Overall 16 people commented on this policy:

- Support 4
- Comment 3
- Object 9

The following key themes were identified in response to this policy:

- a) Further detail on bus service improvements is required.
- b) Continued cross border working on sustainable transport matters is required.
- c) General concern expressed regarding the transport sustainability of sites, in particular in relation to Chalgrove.
- d) New walking, cycling and bus links between settlements should be developed.

### **UK Atomic Energy Authority**

Supports policy in general, but notes need to provide new bus services to Culham.

### **Buckinghamshire County Council**

Support continued engagement on sustainable transport matters.

### **Oxfordshire County Council**

Would like further work to be carried out on sustainable transport measures, particularly in terms of detail on bus services linked to the strategic development sites.

### **Chalgrove Parish Council**

We support the aim of Sub Clause 3 but we also recognise that this is impossible for the Chalgrove site, as there are no public transport hubs within walking or cycling distance, due to the isolated nature of the village. Chalgrove will be a car based village thereby contradicting the policies in the Local Plan.

### **North Moreton Parish Council**

More emphasis needs to be given to improving traffic-free cycle networks between towns and villages in the area, and in particular, measures designed to overcome landowners' reluctance to allow cycleways over their land. There is high interest in cycling in the area, both for commuting and leisure, and the increasing traffic levels make many of the district's roads an obstacle to this healthy and environmentally-friendly activity.

### **The Council's summary response to the main themes**

A Sustainable Transport Study has been developed in association with wider stakeholders. The study has helped to identify priorities for improvements linked to growth. These will need to be refined as detailed planning of each site is progressed.

Walking and cycling links would need to be improved in association with strategic sites. The need for the Didcot Garden Town/ Science Vale area to significantly improve cycle links linked to growth has been recognised by the plan and officers are continuing to work in partnership with Oxfordshire County Council to help achieve this. In response to the consultation, the revised policy will include a further clause supporting sustainable transport improvements in the wider Didcot Garden Town area and in and around Oxford.

Many of the key sustainable transport proposals are included in the IDP, so that funding can be secured for improvements from new developments as they come forward.

**The following changes will be made in response to the consultation:**

A further clause supporting sustainable transport improvements in the wider Didcot Garden Town area and in and around Oxford will be included within the policy.

### **TRANS3: Safeguarding of Land for Strategic Transport Schemes**

Overall 64 people commented on this policy:

- Support 7
- Comment 9
- Object 48

The following key themes were identified in response to this policy:

- a) Concern about safeguarding land for transport schemes in the Green Belt.
- b) A sequential flood risk assessment should be undertaken for safeguarding routes.
- c) Heritage impacts of Culham Crossing should be considered.
- d) Land should also be safeguarded for Watlington Bypass across site WAT 7 (Watlington NP SHLAA site adjacent to B4009).
- e) Concerns regarding the environmental impacts and deliverability of Watlington and Stadhampton bypasses. A route around Chisilhampton could be included. The plan should assess options to the south of the village.
- f) Objection to the Abingdon bypass safeguarding.
- g) Support for the provision of a Benson bypass.

### **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

The policy takes insufficient regard to the natural environment. Biodiversity should be included in the list of considerations.

### **Environment Agency**

A sequential test and level 2 SFRA should be undertaken for all proposed areas of safeguarding within Flood Zone 2.

### **Homes and Community Agency**

Supports the safeguarding policies.

### **Oxfordshire County Council**

The safeguarding maps for the Watlington and Stadhampton bypasses may need to be amended slightly.

### **Reading Borough Council**

Land should be safeguarded for the proposed Thames Road crossing adjacent to Reading.

### **Wokingham Borough Council**

Land should be safeguarded for the proposed Thames Road crossing adjacent to Reading.

### **Clifton Hampden and Burcot Parish Council**

Regarding the land safeguarded for the Clifton Hampden Bypass and a new Thames road crossing between Culham and Didcot Garden Town. The bypass and road route need to connect to avoid multiple new junctions. The safeguarded areas are not sound as they do not connect appropriately and cross residential curtilage.

### **Didcot Town Council**

Didcot Town Council welcomes the safeguarding of land for the Didcot Northern Perimeter Road and Culham to Didcot Thames River Crossing and hopes that these remain a matter of priority.

### **Great Haseley Parish Council**

A bypass for Little Milton has been long promised, but there is no safeguarding allowance for this. The two proposed Thames Crossings and the possible increase in Chalgrove employment land make a bypass urgent in light of increased HGV movements.

### **Pyrton Parish Council**

Object to the allocation of Chalgrove Airfield for development. Object to the inclusion of the safeguarded route for a bypass around Watlington.

- Relief roads often fail to deliver their claimed benefits.
- There appears to be insufficient evidence of the need for a bypass around Watlington and it is not identified in the Local Transport Plan.
- Insufficient research has been conducted on the effects of this bypass.
- Funding and deliverability of this new road are questionable.
- Other options of a route for a new road around Watlington have not been examined.
- The route to the northwest of Watlington currently provides a green gap between Watlington and Pyrton, preventing their coalescence. The Local Green Belt Study (2015) advised against any development on the land between Pyrton lane and Watlington Sports field (identified as PYR2) due to the impact on the AONB, Conservation Areas and its sensitive position in the landscape.
- The proposed route would have a detrimental impact, through light, air and noise pollution, upon Pyrton's conservation area and the historic environment and setting of the Grade II\* listed Pyrton Manor and Shirburn Castle.
- Concern regarding the route ending on a road linking with the Oxfordshire Way and adjoining Shirburn Castle's Registered Parkland and a line of ancient Holme Oak Trees.
- A road to the northwest of Watlington is likely to exacerbate current problems of flooding within Pyrton village.

### **Sutton Courtenay Parish Council**

No account has been taken of recent studies undertaken by Oxfordshire County Council which show traffic congestion and the inability of local roads to take more traffic which would arise as a result of the new river crossing.

Para 3.4 in Transport Topic paper recognises and promotes wider benefits of transport schemes, but does not recognise the impact on rural villages which will become cut through routes to link Didcot to the Culham Science Centre and beyond. Explanation needs to be provided as to why the west site close to Sutton Courtenay has been included as saved land for a river crossing, which if constructed, would attract a significant amount of increased traffic, contrary to information provided by Oxfordshire County Council which confirms the local road network is over capacity.

### **Watlington Neighbourhood Plan Community Forum**

The policy for the inclusion of a bypass for Watlington is sound but the map is not appropriate. Even though the route is indicative it does not represent a realistic option as it does not show a junction with the B4009 at Pyrton. The map should be re-drawn to show the route continuing along the lane to join the B4009 at the Pyrton crossroads, taking in land from the adjacent development site.

### **Watlington Parish Council**

The inclusion of an indicative route for the re-aligned B4009 around Watlington is supported, however the route indicated does not show the need for some safeguarded land at its junction with the current B4009 north of Watlington.

Awareness of the AQMA in Watlington is included in the plan but a clear statement that this needs to be addressed should be included. Two problems need to be addressed:

Cumulative effects: NPPF Para124 requires compliance with and contribution towards EU limit values or national objectives, taking account of AQMA's and the cumulative impact on air quality from individual sites in local areas. Protection measures need to be put in place as early as possible. The cumulative effect must consider not only the developments proposed for Watlington but also the traffic from the other developments that feed into the B4009 traffic. Developments that depend on the bypass for Watlington to provide a sustainable and environmentally acceptable route through the town should not be undertaken without an agreed arrangement for construction of the safeguarded route.

Timing of development: If the re-aligned B4009 route around Watlington requires financial support from the development of the STRAT9 site, it is unlikely that a full route will be available for many years, and certainly not before the proposed developments in Watlington and in Benson have been substantially completed. If it is decided that STRAT9 development does not proceed then it is essential that the Local Plan still ensures that the route is constructed.

The third paragraph of TRANS3 should include a statement to the effect that developments that depend on the existence of these safeguarded schemes for avoidance of environmental harm elsewhere are not given approval to proceed until firm agreement on the safeguarded schemes are in place.

### **The Council's summary response to the main themes**

The safeguarded land set out in the Plan aligns with the strategic transport schemes Oxfordshire County Council has included within the Oxfordshire Local Transport Plan 4 (2015) and land required to deliver the transport requirements to support the delivery of individual sites proposed by the Plan. In accordance with the duty to co-operate the Council needs to make provision for the safeguarded routes indicated by LTP4 within the Plan. The transport infrastructure requirements to support the delivery of individual sites is being reviewed with Oxfordshire County Council through the Infrastructure Delivery Plan.

Officers will continue to work positively with site promoters and Oxfordshire County Council to develop more detail on infrastructure matters associated with strategic sites, including sustainable transport proposals.

The Local Plan needs to ensure that land is only safeguarded for transport schemes where it is possible to demonstrate that there is a reasonable prospect of the scheme being delivered. As the Highways Authority for the area is Oxfordshire County Council, it is beyond the remit of this Plan to safeguard routes where the county council has not committed to the delivery of a scheme. Accordingly, a route for a bypass around Little Milton has not been included in the Plan.

Further work with Oxfordshire County Council regarding the deliverability of a bypass for Stadhampton has concluded that the proposed safeguarding of land around Stadhampton will no longer be necessary although the bypass is required. This safeguarded route will be removed from the revised Plan but referred to in the policy for Chalgrove airfield.

The need for sequential flood assessment in relation to the appraisal process is noted and will be reflected within the revised Plan, including the need for a flood risk sequential test and exception test where schemes are located in areas within Flood Zones 2 and 3.

**The following changes will be made in response to the consultation:**

- The revised Plan will remove the Stadhampton and Chiselhampton bypass safeguarded routes.
- The Plan will be revised to include a need for a flood risk sequential test and exception test where schemes are located in areas within Flood Zones 2 and 3.

#### **TRANS4: Transport Assessments, Transport Statements and Travel Plans**

Overall 5 people commented on this policy:

- Support 0
- Comment 1
- Object 4

The following key themes were identified in response to this policy:

- a) No comments received on scope of policy
- b) Objection to the allocation of Chalgrove.
- c) Transport issues related to Chalgrove & Culham allocations and the towns of Thame and Henley including impacts of the proposed development on parking in Henley.

#### **The Council's summary response to the main themes**

It is considered that the policy will assist in ensuring that detail of transport impacts is proved by developers at the planning application stage. It will therefore complement delivery of the strategic sites and housing policies included within the plan.

#### **The following changes will be made in response to the consultation:**

None



## **TRANS5: Consideration of development proposals**

Overall 6 people commented on this policy:

- Support 1
- Comment 1
- Object 4

The following key themes were identified in response to this policy:

- a) Flexibility should be exercised in the application of parking standards
- b) Development of Chalgrove Airfield is contrary to the policy.
- c) Developments should be required to protect and provide adequate links with the existing right of way network, which is particularly important for horse riders.

### **Kidmore End Parish Council**

We support improved pedestrian routes and cycle ways for new developments.

### **Great Haseley Parish Council**

Policy TRANS 5, Clause (vi) Who determines when these are required and what sanctions are available to the Council if they are not provided when required?

Policy TRANS 5 Clause (xii) Charging points for electric and hybrid vehicles should be a requirement for all new homes with private parking and for communal parking spaces.

### **The Council's summary response to the main themes**

The support for the provision of pedestrian routes and cycle ways for new developments is noted. The requirements for this essential infrastructure will be determined at the planning application stage in consultation with Oxfordshire County Council as Highways Authority.

Public Rights of Way are afforded strong protection in law beyond the planning system. Policy CF1 recognises the need to protect Public Rights of Way.

It is agreed that parking schemes should include charging points for electric vehicles. The South Oxfordshire Design Guide include guidance on this matter, however, parking standards are determined by Oxfordshire County Council as Highways Authority. The requirement for charging points for vehicles is controlled by Oxfordshire County Council's Parking Standards and any flexibilities in the application of the policy will be at the discretion of the County Council. The revised Plan has considered NPPF 2018 Para 105e which supports the provision of spaces for charging plug-in and other ultra-low emission vehicles and will amend the policy accordingly.

The objections to the allocation of Chalgrove are noted. As a strategic allocation within the plan the package of highway improvements necessary to secure the development of Chalgrove Airfield will be guided by the Infrastructure Delivery Plan and refined at the planning application stage.

### **The following changes will be made in response to the consultation:**

The policy will be amended in accordance with NPPF 2018 Para 105e.

**TRANS6: Rail**

Overall 3 people commented on this policy:

- Support 0
- Comment 0
- Object 3

The following key theme was identified in response to this policy:

Objection to the allocation of Chalgrove. The site does not have good access to rail, and therefore will be a car based development.

**The Council's summary response to the main themes**

The objections to the allocation of Chalgrove are noted. As a strategic allocation within the plan the package of transport improvements necessary to secure the development of Chalgrove Airfield will be guided by the Infrastructure Delivery Plan and refined at the planning application stage.

**The following changes will be made in response to the consultation:**

None

## **TRANS7: Development generating new lorry movements**

Overall 3 people commented on this policy:

- Support 0
- Comment 0
- Object 3

The following key theme was identified in response to this policy:

Objection to the allocation of Chalgrove. The construction of the site will significantly increase HGV movements and cannot be supported by the existing road network.

### **Great Haseley Parish Council**

The criteria for “significant increases” should be spelled out and there needs to be recognition of environmental weight limit restrictions so that these do not become a farce.

### **The Council’s summary response to the main themes**

The policy makes clear that there will need to be assessment of lorry movements to assess impacts on the surrounding network. This would normally be contained within a Transport Assessment as required by TRANS 4, and assessed as normal by the Highway Authority. The level of HGV movements acceptable will depend on various factors such as the surrounding highway network and current levels of traffic and therefore specific criteria would be difficult to define.

The objections to the allocation of Chalgrove are noted. As a strategic allocation within the Plan the package of transport improvements necessary to secure the development of Chalgrove Airfield will be guided by the Infrastructure Delivery Plan and refined at the planning application stage.

The increase in lorry movements would be expected to be limited to the construction phase of the development. Oxfordshire County Council as Highways Authority would agree appropriate servicing of the site during the construction phase at the planning application stage.

### **The following changes will be made in response to the consultation:**

None.

## **INF2: Electronic Communications**

Overall 2 people commented on this policy:

- Support 0
- Comment 0
- Object 2

The following key theme was identified in response to this policy:

### **The Council's summary response to the main themes**

There is a need to provide clarity on the definition of superfast broadband.

#### **Thame Town Council**

The policy should define superfast broadband. Thame recommend use of Ofcom, rather than central government standards: (The Government defines superfast as speeds greater than 24Mbps, whereas Ofcom (the UK regulator) defines it as speeds greater than 30Mbps)

#### **Great Haseley Parish Council**

The policy should define superfast broadband.

### **The Council's summary response to the main themes**

The need to provide greater clarity on this point is noted, however the revisions to national policy within NPPF 2018 now mean that all new development will be required to be served with full fibre broadband in accordance with NPPF 2018 Para 112.

### **The following changes will be made in response to the consultation:**

The policy will be revised to require the provision of appropriate connections to enable full fibre broadband connections in accordance with NPPF 2018 Para 112.

### **INF3: Telecommunications Technology**

Overall 2 people commented on this policy:

- Support 2
- Comment 0
- Object 0

The following key themes were identified in response to this policy:

- a) Error in continuing reference to Chinnor Reservoir safeguarding
- b) Further context considered necessary to INF3 on heritage matters

### **Thames Water**

Propose removal of para 7.28 as this refers to Chinnor Reservoir which is no longer in the plan.

### **Historic England**

Welcomes references to heritage policies in criterion i), but regret the loss of the criterion referring to archaeological sites, conservation areas or buildings of architectural or historic significance.

### **The Council's summary response to the main themes**

The error at para 7.28 on Chinnor reservoir safeguarding is acknowledged.

It is considered that the heritage reference within the policy is sufficient. The plan must be considered as a whole and Policy ENV6 together with the suite of design policies will provide appropriate protection of the historic environment where telecommunication development is proposed.

### **The following changes will be made in response to the consultation:**

The safeguarding reference set out in Paragraph 7.28 will be removed from the revised Plan.

## **INF4: Water Resources**

Overall 4 people commented on this policy:

- Support 2
- Comment 1
- Object 1

The following key themes were identified in response to this policy:

### **Environment Agency**

Thames Water is responsible for the planning and implementation required to provide a secure supply of water to their customers which supports future growth. Thames Water will advise on the capacity of their network to supply water to a local development. The Environment Agency regulates the use of water and licences water for use by private abstractors and water companies.

Propose changes to the policy wording as follows: All development proposals must demonstrate that there are or will be adequate water supply, and waste treatment facilities waste water treatment and foul sewerage in place to serve the whole development

For sites where it has been identified that network capacity will be an issue, plans should be proposed to phase the development to ensure that there is available capacity in advance of occupation of dwellings

And to para 7.29 as follows:

'Measures to reduce the demand for water-should must be incorporated into new development'

### **The Council's summary response to the main themes**

The Environment Agency's comments with regard to the policy are noted. The policy in the revised Plan will be revised to ensure that the policy includes the need to demonstrate water supply, surface water, foul drainage and sewerage treatment capacity across the whole development. In addition, the policy will be amended to ensure that where a capacity constraint has been identified and improvements on off-site infrastructure are not programmed, the developer will need to set out how the infrastructure improvements will be completed prior to occupation of the development.

### **The following changes will be made in response to the consultation:**

The policy will be amended to ensure that water supply, surface water, foul drainage and sewerage treatment capacity is demonstrated, and a programme for the completion of any required improvements to infrastructure prior to occupation of the development is agreed.

## Chapter 8: Natural and Historic Environment

### ENV1: Landscape and Countryside

Overall 20 people commented on this policy:

- Support 3
- Comment 5
- Object 12

The following key themes were identified in response to this policy:

- a) Areas of Outstanding Natural Beauty:
  - The Plan provides insufficient protection for AONBS.
  - There should be a standalone AONB policy. The model Chilterns AONB policy developed by The Chilterns Conservation Board was suggested.
  - Specific reference should be made to tranquillity in the AONBs and protection against noise disturbance.
  - Allowances should be made for planned growth within the AONBs.
- b) Green Belt should be included within the policy text of ENV1.
- c) The wording of Policy ENV1 criterion iii) should be amended to be more encouraging – ‘Development will only be permitted where it protects or where possible enhances’ / more flexible – ‘Where possible, development should protect or enhance’.
- d) Paragraph 8.16 relating to hedgerows:
- e) The Hedgerow Regulations are not necessarily the most appropriate means of identifying hedgerows worthy of retention.
- f) Whilst in many cases compensatory planting may be appropriate, other forms of mitigation or compensation should not be ruled out.
- g) The need to preserve Public Rights of Way should be recognised.
- h) The role that could be played by agro-ecology should be recognised.
- i) There is a need for more moorings at Wallingford. An additional 8-10 moorings could be provided in Castle Meadows but this would be prevented by Policy ENV1.

### Wycombe District Council

Support the intentions of Policy ENV1 in containing/mitigating the impacts of development within South Oxfordshire.

### Environment Agency

Support the strong policy wording. One minor modification was requested to point iii) d): "Except under exceptional circumstances, and in agreement with the Local Authority and Environment Agency, proposals for posts, earthworks or facing river banks with piles and planking will not be permitted."

### Historic England

Welcome the commitment to protecting and enhancing the North Wessex Downs and Chilterns AONBs. Historic England welcomes criteria iii) a, b, c. and d of Policy ENV1 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the NPPF (2012).

### **The Council's summary response to the main themes**

In response to comments received, amendments to Policy ENV1 are proposed to reflect the hierarchy of landscape designations as required by NPPF 2018:

- (i) The first part of Policy ENV1 will relate to the protection of AONBs. The highest level of protection will be given to the landscape and scenic beauty of AONBs.

The NPPF requires that local plans plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. This is particularly relevant in considering the Chilterns and North Wessex Downs AONBs which cross multiple local authority boundaries. To support the enhancement of the AONBs' natural capital at a landscape scale, neighbouring authorities' AONB policy wording has been reviewed with the aim of ensuring consistency of approach, considering the Chiltern Conservation Board's 'model local plan policy' and has taken into consideration relevant AONB Management Plans. This is reflected in the resultant Policy ENV1 wording, specifically the requirement to consider AONB setting, the requirement for a proportionate Landscape and Visual Impact Assessment, and the confirmation that AONB Management Plans will be a material consideration in decision making.

- (ii) The second part of Policy ENV2 relates to South Oxfordshire's landscape, countryside and rural areas more broadly. It aims to protect and enhance features that contribute to the nature and quality of South Oxfordshire's valued landscapes.
- (iii) The NPPF does not define what constitutes a valued landscape. The Plan has therefore set out in Policy ENV1 a number of features which might contribute to value and quality and therefore may require protection and enhancement. This includes tranquillity.

It is appropriate to use the definition of important hedgerows as defined in The Hedgerow Regulations 1997 as this is a statutory definition which recognises the value of hedgerows based on a range of characteristics such as age, archaeology and history, and wildlife and landscape. Paragraph 8.16 of the Local Plan seeks to protect and retain South Oxfordshire's important hedgerows and to provide compensation where this is not possible.

The protection of Public Rights of Way is addressed by Policy CF1.

The Environment Agency's comments in relation to watercourses are agreed. However, it is proposed to move these requirements to ENV4: Watercourses.

### **The following changes will be made in response to the consultation:**

Policy ENV1 will be amended to reflect the hierarchy of landscape designations as set out in NPPF 2018.



## **ENV2: Biodiversity – Designated Sites, Priority Habitats and Species**

Overall 9 people commented on this policy:

- Support 1
- Comment 1
- Object 7

The following key themes were identified in response to this policy:

- a) Protection of biodiversity is supported.
- b) It is not clear that the NPPF (2012) requirement to plan for biodiversity at a landscape-scale across local authority boundaries has been met.
- c) Sites of international nature conservation importance are limited to Special Areas of Conservation. Even if there are no other internationally important nature conservation sites within the district, large-scale development could affect other types of internationally important sites elsewhere.
- d) Where development would affect a SSSI, mitigation or compensation should be required.
- e) Inappropriate development both within and surrounding SSSIs needs to be considered.
- f) Ancient woodland and veteran trees should be included within the policy.
- g) It is inappropriate to afford the same level of protection to 'Proposed Local Wildlife Sites' as to confirmed Local Wildlife Sites.
- h) The listing of the Dorchester Gravel Pits (Queenford Pit) SU578953 as a County Wildlife site (Appendix 9) is objected to by the landowner.
- i) The Conservation of Habitats and Species Regulations 2010 have been subject to amendments. For clarity, the words 'as amended' should be added.

### **Horspath Parish Council**

There should be a specific policy for the Shotover & Brasenose Woods SSSI recognising the specific locational challenges and threats to this SSSI.

### **The Council's summary response to the main themes**

The NPPF states that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. The Local Plan plans to maintain and enhance habitats at landscape scale across local authority boundaries by:

- i. Seeking to protect and enhance Conservation Target Areas, which form the ecological network for Oxfordshire (Policy ENV2);
- ii. Planning for Green Infrastructure, with a jointly prepared South Oxfordshire and Vale of White Horse Green Infrastructure Strategy (Policy ENV5); and
- iii. Highlighting the need to consider AONB Management Plans as a material consideration in decision making (Policy ENV1). These consider biodiversity at the AONB scale, across multiple local authority boundaries.

The South Oxfordshire Habitats Regulation Assessment (January 2018) does not identify that the plan could have any potential significant effects on European sites other than Special Areas of Conservation (SACs). It is therefore proportionate to only include SACs within the policy wording. If this situation were to change in the future, for example if a new European site were to be designated within South Oxfordshire

or a neighbouring authority area, the policy wording would not preclude the protection of such sites.

It is important that any harm to SSSIs is effectively mitigated and, if this is not possible, appropriate compensation is provided. This requirement has been added to Policy ENV2. It is not necessary to include individual policies for specific SSSIs as strong protection is already provided by Policy ENV2 and each case would be considered based on its individual circumstances. Policy ENV2 provides protection from any development that would affect a SSSI, be that development within the site or in the surrounding area, cumulatively or individually.

Proposed Local Wildlife Sites are not identified for protection by Policy ENV2.

As stated in Appendix 9, the County Wildlife Site selection system is informed by a rolling survey programme, with sites being added to and removed from the list as part of the process.

**The following changes will be made in response to the consultation:**

The policy will be amended to reflect further protection for SSSI and Ancient woodland and veteran trees in accordance with NPPF 2018.

### **ENV3: Biodiversity – Non designated sites, habitats and species**

Overall 6 people commented on this policy:

- Support 2
- Comment 0
- Object 4

The following key themes were identified in response to this policy:

- a) Support for the policy approach.
- b) Developers should be encouraged to integrate biodiversity enhancement into new developments, with supporting text providing guidance on what this could entail such as ecologically-rich SUDS measures, nesting opportunities for birds/bats, green roofs/walls and planting of native species. It should be emphasised that biodiversity in development is also about creating a much better environment for people.
- c) The phrase "and should result as a minimum of a no net loss of biodiversity" creates ambiguity and should be removed. The phrase "an overall no net loss of biodiversity" should be used.
- d) Horspath Wildlife Conservation Area should be added to Appendix 9.
- e) The Chalgrove Airfield development will have negative impacts on biodiversity and should therefore be removed from the Plan.

### **Horspath Parish Council**

Paragraph 8.21 mentions the role of CTAs as buffers for important habitats but it does not expand on the concept of terrestrial buffer zones in an equivalent way to the treatment of Watercourse Buffer zones which are described in paragraphs 8.26 and 8.30. This is an inconsistent approach.

### **The Council's summary response to the main themes**

Policy ENV3 is clear that development should provide a net gain in biodiversity where possible. More detailed guidance on how measures to support and enhance biodiversity can be incorporated into developments is provided in the South Oxfordshire Design Guide Supplementary Planning Document (2016) and the supporting Biodiversity Technical Document (2016).

Fixed distance based buffers are provided for watercourses (Policy ENV4). It is not appropriate to apply a fixed distance based buffer to CTAs or other sites with biodiversity interest because the impact of development on biodiversity interest will differ based on a wide range of factors. Instead, developers are required to undertake a proportionate ecological assessment to understand the full impacts of development (modified paragraph 8.17).

It is suggested that the phrase "and should result as a minimum of a no net loss of biodiversity" is modified to ensure clarity. The proposed modification is set out in our proposed modifications to the policy below.

The Local Wildlife Sites listed in Appendix 9 have been reviewed against the Thames Valley Environmental Records Centre (TVERC) list of Local Wildlife Sites 2017. Modifications to Appendix 9 are suggested to ensure consistency between the Local Plan and TERC records.

The strategic allocation of land Chalgrove Airfield (Policy STRAT9) requires the enhancement of ecologically important habitats. A separate strategic site assessment process has been undertaken.

**The following changes will be made in response to the consultation:**

The supporting text will be amended to require adequate information to be provided to assess the impact of development on biodiversity.

#### **ENV4: Watercourses**

Overall 5 people commented on this policy:

- Support 2
- Comment 0
- Object 3

The following key themes were identified in response to this policy:

- a) Policy approach supported.
- b) Opportunities should be taken to maximize biodiversity benefits through the creation and management of appropriate habitats and features.
- c) Developments such as crossing points for watercourses (e.g. footbridges) will need to be located within watercourse buffer zones.
- d) The following text should be added to paragraph 8.23: "Of specific note are South Oxfordshire's globally rare chalk streams which support special wildlife habitats and species, due to the high clarity and quality and stable temperature regime of the water".
- e) The policy should be consistent with national requirements which require a minimum buffer of 8m.

#### **The Council's summary response to the main themes**

The support for Policy ENV4 is noted.

South Oxfordshire's watercourses support a range of habits and species, as well as being key landscape features. Policy ENV4 therefore focuses on specific policy measures to protect these resources.

Developers are required to allow a buffer zone on each side of a watercourse to create corridors that are favourable to biodiversity enhancement. The requirement for a 10m buffer is explained in paragraphs 8.26-8.27 of the Publication Version Local Plan 2033 (October 2033). In addition to planning permission, there are separate environmental controls for regulated works within specific distances of main rivers.

#### **The following changes will be made in response to the consultation:**

The requirements for mooring stages will be moved from Policy ENV1 to Policy ENV4, reflecting the comments made by the Environment Agency to Policy ENV1.

## **ENV5: Green Infrastructure in new developments**

Overall 7 people commented on this policy:

- Support 1
- Comment 1
- Object 5

The following key themes were identified in response to this policy:

- a) Support for the policy.
- b) The long-term management of green infrastructure assets needs to be considered. This could be achieved by requiring Landscape and Ecological Management Plans.
- c) The importance of public rights of way should be recognised.
- d) Insufficient green infrastructure is proposed to compensate for overall losses at Didcot.

### **Buckinghamshire County Council**

Buckinghamshire and Milton Keynes NEP have published a strategic document: 'Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes'. BBC welcome continued and further engagement in relation to strategic green infrastructure issues.

### **Great Haseley Parish Council**

The contribution to Green Infrastructure must be made a requirement not just a wish.

### **The Council's summary response to the main themes**

Support for the policy is noted.

It is agreed that it is important that arrangements are put in place to ensure the ongoing management and maintenance of green spaces. This is recognised in the South and Vale Green Infrastructure Study (March, 2017)<sup>1</sup>.

Policy CF1 recognises the need to protect Public Rights of Way. Public Rights of Way are afforded strong protection in law beyond the planning system.

### **The following changes will be made in response to the consultation:**

Additional text to be added to the third paragraph of Policy ENV5 to support the ongoing maintenance of new green infrastructure.

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<sup>1</sup> Point 5, Box 3.1 of The South Oxfordshire and Vale of White Horse Green Infrastructure Strategy (March 2017)

## **ENV6: Historic Environment**

Overall 11 people commented on this policy:

- Support 4
- Comment 1
- Object 6

The following key themes were identified in response to this policy:

- a) Support for the policy approach.
- b) The policy states that heritage assets will be conserved and enhanced. This approach does not allow for the balancing exercise set out in the NPPF where harm is considered against the benefits of a proposal to be taken into account.
- c) Protection of heritage assets should be prioritised, not balanced against other benefits.
- d) The importance of views of the historic core of Oxford City should be recognised.

### **Historic England**

Welcome and support Policy ENV6. Policy ENV6 provides a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment.

Welcome references to the Heritage Impact Assessment and the Oxfordshire Historic Landscape Characterisation Project. References to further evidence and a heritage topic paper could be provided. Nevertheless, Historic England is satisfied that the Local Plan is based on adequate, up-to-date and relevant evidence about the historic environment. The importance of the historic environment is recognised throughout the Plan. This is supported.

Whilst Historic England has identified a limited number of further opportunities for referencing the historic environment throughout the Plan, Historic England considers that the Plan sets out an adequate positive strategy for the conservation and enjoyment of the historic environment and clear strategy for enhancing the historic environment. Historic England considers that the requirements of the NPPF for the consideration of the historic environment in local plans have been fully met and, accordingly, that the Plan is therefore sound in this respect.

### **The Council's summary response to the main themes**

Support for the policy is noted.

The NPPF requires that harm to heritage assets is balanced against other appropriate considerations in a way that reflects both the significance of the heritage asset and the level of harm that would be incurred. This is reflected in Policies ENV7, ENV8, ENV9 and ENV10.

It is important to consider cross-boundary impacts on heritage assets. The supporting text to the policy refers to sources of information on the historic environment such as the Oxfordshire Historic Landscape Characterisation Project and Conservation Area Character Appraisals. Taken together, these sources of information on the historic environment are considered to adequately reference important historic views such as views of the historic core of Oxford City. Specific references to the protection of views of Oxford will be set out in the revised Plan within relevant allocation policies.

**The following changes will be made in response to the consultation:**

The Council's intention to protect, conserve and enhance the historic environment will be set out within the revised policy.



### **ENV7: Listed Buildings**

Overall 5 people commented on this policy:

- Support 2
- Comment 0
- Object 3

The following key themes were identified in response to this policy:

- a) Support for policy.
- b) Need to protect heritage assets in towns and villages. Neighbourhood Development Plans override policies in the Local Plan and do not sufficiently protect our built and natural assets.

### **Historic England**

Welcome and support Policy ENV7 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework (2012).

### **The Council's summary response to the main themes**

Support for the policy is noted.

Listed buildings are afforded strong protection through the Local Plan, the NPPF and legislation. Neighbourhood Development Plans will need to accord with these requirements.

### **The following changes will be made in response to the consultation:**

None

### **ENV8: Conservation Areas**

Overall 5 people commented on this policy:

- Support 2
- Comment 0
- Object 3

The following key themes were identified in response to this policy:

- a) The policy is supported.
- b) Allowing harm to a conservation area where it is necessary to achieve public benefits that outweigh that harm or loss was questioned.

### **Historic England**

Welcomes and supports Policy ENV8 as an exemplar policy for conservation areas and as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework (2012).

### **Great Haseley Parish Council**

These requirements should not be just an expectation.

### **The Council's summary response to the main themes**

Support for the policy is noted.

It is considered that Policy ENV8 is consistent with the NPPF which requires that harm to heritage assets is balanced against public benefits of development.

### **The following changes will be made in response to the consultation:**

None.

### **ENV9: Archaeology and Scheduled Monuments**

Overall 2 people commented on this policy:

- Support 2
- Comment 0
- Object 0

The following key theme was identified in response to this policy:  
Support for the policy.

#### **Historic England**

Welcome and support Policy ENV9 as an exemplar policy on archaeology and as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework (2012).

#### **The Council's summary response to the main themes**

Support for the policy is welcomed and noted.

#### **The following changes will be made in response to the consultation:**

None.

## **ENV10: Historic Battlefields, Registered Parks and Gardens and Historic Landscapes**

Overall 2 people commented on this policy:

- Support 2
- Comment 0
- Object 0

The following key theme was identified in response to this policy:  
Support for the policy.

### **Historic England**

Welcome and support Policy ENV10 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework (2012).

### **The Council's summary response to the main themes**

Support for the policy is welcomed and noted.

### **The following changes will be made in response to the consultation:**

None

## **ENV11: Pollution – Impact from Existing and/or Previous Land Uses on New Development (Potential Receptors of Pollution)**

Overall 2 people commented on this policy:

- Support 0
- Comment 1
- Object 1

The following key theme was identified in response to this policy:

Assessment of noise pollution is inconsistent. A site in Benson was considered unsuitable due to the noise of aircraft movements at RAF Benson. How can housing at Chalgrove Airfield be supported when there will be significant noise from both military and civil aircraft movements? In addition, the batch testing of ejector seat rocket motors produces very high levels of noise which would be very close to residential housing proposed.

### **Environment Agency**

The impacts of pollution on the natural environment, particularly groundwater, should also be addressed within this policy.

### **The Council's summary response to the main themes**

Chalgrove Airfield is used by the Martin-Baker company for the development and testing of aircraft ejection seats. The strategic allocation for development on this site includes the safeguarding of land to allow Martin-Baker to continue operations alongside new development. The noise impacts resulting from Martin-Baker Ltd's operations on new development at Chalgrove cannot be properly assessed until the layout of development is known. This assessment is expected to be undertaken as part of the development process of the scheme. Any planning application would be considered against the requirements of Policy ENV11.

Officers have worked with the Environment Agency to amend the policy wording so that appropriate protection is provided for the natural environment, particularly ground water.

### **The following changes will be made in response to the consultation:**

- Inclusion of additional wording to the policy to provide appropriate protection for the natural environment and to ensure that contamination is effectively treated, by the developer, prior to development, will be included within the revised Plan
- Inclusion of references to legacy contamination of soils or groundwater within the supporting text.

## **ENV12: Pollution – Impact of Development on Human Health, the Natural Environment and/or Local Amenity (Potential Sources of Pollution)**

Overall 7 people commented on this policy:

- Support 0
- Comment 2
- Object 5

The following key theme was identified in response to this policy:

National guidance encourages an avoid, prevent, reduce approach to noise pollution. This should be addressed early on in the design process.

### **Environment Agency**

Recommend paragraph 8.47 is modified: “Pollution can also include legacy contamination of soils or groundwater, ground conditions and land instability, natural hazards or sources of pollution from former activities such as mining”.

### **Great Haseley Parish Council**

There should be noise generation limits for new industrial premises and from, for example, air conditioning or heat pump units and ventilation plant.

### **Thame Town Council**

The Plan is not consistent with national policy. The aims of Policy ENV12 are laudable. However, the District Council's strategy of dispersing Oxford City's unmet need across the whole District is not. This is unsustainable, in leading to lengthened journey times by private car or public transport; it will affect the quality of life of the dispersed individuals. This will in turn adversely affect the environment and public health.

### **The Council's summary response to the main themes**

Policy ENV12 is clear that the impacts of development on human health, the natural environment and/or local amenity should be considered from the start of the development process, in considering the location and design of new development.

Technical standards relating to pollution limits are covered by environmental protection legislation. The Council's environmental protection team would be consulted on any relevant development proposals.

The sustainability appraisal supports the spatial distribution of development within the district. Drawing on a combined approach to the distribution of new housing development enables a series of benefits to be delivered through the Local Plan. In response of the consultation comments, the Plan has made further provision for sites adjacent to Oxford to help meet the requirements of the Oxfordshire Housing and Growth Deal.

### **The following changes will be made in response to the consultation:**

Inclusion of references to legacy contamination of soils or groundwater in the supporting text within the revised Plan.

### **EP1: Air Quality**

Overall 5 people commented on this policy:

- Support 0
- Comment 1
- Object 4

The following key themes were identified in response to this policy:

- a) All development should minimise air pollution as far as possible.
- b) Air pollution levels both on-site and off-site should be considered.
- c) In areas where air pollution levels are already above regulatory thresholds, development that would result in any increase in air pollution should be refused.
- d) More should be done to reduce air pollution caused by cars by promoting car-free developments and encouraging the use of electric vehicles.

### **Kidmore End Parish Council**

Question whether the policy should refer to European regulations.

#### **The Council's summary response to the main themes**

Policy EP1 ensures that air quality is a key consideration for all new developments. Policy EP1 sets out how development proposals that would have a negative impact on air quality will be considered. This includes requiring mitigation measures, the use of planning obligations and refusing planning applications that would result in air pollution levels set by EU and UK regulations being exceeded.

It is appropriate to refer to both EU and UK air quality regulations as this is the current regulatory framework.

Encouraging sustainable modes of travel and the provision of electric car charging points are supported elsewhere in the Plan, specifically Policy TRANS5 and its supporting text.

#### **The following changes will be made in response to the consultation:**

None

**EP2: Hazardous Substances**

No responses to this policy were received.

**The following changes will be made in response to the consultation:**

None



**EP3: Waste Collection and Recycling**

No comments were received relating to Policy EP3.

**The following changes will be made in response to the consultation:**

None

#### **EP4: Flood Risk**

Overall 11 people commented on this policy:

- Support 0
- Comment 1
- Object 10

The following key themes were identified in response to this policy:

- a) The Sequential Test for site allocations should be applied across the district, not to individual neighbourhood plan areas, as this might artificially force developments into higher flood risk areas. If neighbourhood planning groups are unable to identify sites in low flood risk areas, then SODC should advise on alternative sites beyond the neighbourhood planning area.
- b) Development at Chalgrove Airfield will increase the risk of flooding in Chalgrove village.
- c) SuDS are not appropriate on the Chalgrove Airfield site.
- d) Development at Culham should be designed so as not to increase flood risk to the surrounding area.

#### **Environment Agency**

- Is pleased that a flood risk policy has been included that is consistent with national policy. However, consider that more could be done to make the policy locally specific.
- Welcomes the mention of climate change but would like to see a specific reference to the climate change allowances as set out in the NPPG.
- Minor amendments suggested relating to the role the EA.

#### **The Council's summary response to the main themes**

In setting housing targets to be delivered through neighbourhood plans, the Local Plan recognises that environmental constraints such as flood risk may mean that targets are not fully achievable (paragraphs 5.27 and 5.38). The impact on delivery is addressed through the inclusion of a buffer in the housing supply.

The Strategic Flood Risk Assessment has assessed flood risk relating to strategic sites and this has been taken into consideration through the site allocation process. The Local Plan also ensures that flood risk would be addressed in detail at the planning application stage as Policy EP4 requires site-specific flood risk assessments for all developments of 1 hectare or more and in addition Policy STRAT5 requires an integrated water management plan to be submitted as part of development proposals for strategic sites.

The Environment Agency is clear that Policy EP4 complies with national policy requirements. Whilst the agency has suggested two locally specific requirements be added to this policy, this is not considered necessary to make the policy sound.

#### **The following changes will be made in response to the consultation:**

- The supporting text will be amended to reference climate change allowances as set out in the National Planning Practice Guidance.
- The supporting text will also be amended to note that the Environment Agency provide bespoke advice where developments in high flood risk areas require a site-specific flood risk assessment and to note that Neighbourhood planning

groups considering proposing development within areas at risk of flooding will need to apply the Sequential test to the whole neighbourhood area.

- The circumstances under which a Site Specific Strategic Flood Risk Assessment will be required will be clarified in the revised policy.

### **EP5: Minerals Safeguarding Areas**

Overall 1 person commented on this policy:

- Support 0
- Comment 0
- Object 1

#### **The following key theme was identified in response to this policy:**

The policy wording is too rigid. Account should be made for sites within Minerals Safeguarding Areas that would not be suitable for minerals extraction (for example those within close proximity to existing residential areas). We therefore suggest that the policy is amended to allow the opportunity for development proposals within MSAs to demonstrate that they are not appropriate for extraction, rather than to automatically direct development away from these areas. The policy should be reworded to allow applicants to demonstrate that whether need for development outweighs the economic and sustainability considerations relating to the mineral resource.

### **Oxfordshire County Council**

Policy EP5 is supported. The policy is broadly in line with the Mineral and Waste Core Strategy Policy M8. Additional text is required to support Policy EP5 noting Mineral Safeguarding Areas need to be taken into account in respect of allocations at Culham Science Centre and Berinsfield, and that they also need to be taken into account in preparing Neighbourhood Plans. Mineral Safeguarding Areas could be added to the Policy Map.

#### **The Council's summary response to the main themes**

Minerals Safeguarding Areas are defined by the Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (adopted September 2017). Since minerals are a non-renewable resource, minerals safeguarding ensures that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance. Policy EP5 provides appropriate protection.

Neighbourhood Plans must be in conformity with the Local Plan and NPPF. The NPPG requires district councils to show Minerals Safeguarding Areas on their policies maps. It is proposed that this is added to the Policies Map as a modification.

#### **The following changes will be made in response to the consultation:**

- The supporting text will be amended to read refer to Minerals Safeguarding Areas as shown on the Policies Map.
- Minerals Safeguarding Areas will be added to the Policies Map.

## **Chapter 9: Built Environment**

### **DES1: Delivering High Quality Development**

Overall 7 people commented on this policy:

- Support 3
- Comment 1
- Object 3

The following key themes were identified in response to this policy:

- a) Support for new development to be of a high-quality design.
- b) Support for new development to visually enhance and complement its surroundings.
- c) The policy (and OBJ 5.1) should recognise that a different and less urban design approach needs to be promoted for the smaller villages that seeks to respect local character, specifically with regard to layout.
- d) The South Oxfordshire Design Guide should set out a different and less urban design approach for the smaller villages.

### **Historic England**

Welcomes and supports the policy as part of a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment.

### **The Council's summary response to the main themes**

Support for the policy is noted. Chapter 9 of the South Oxfordshire Design Guide sets out how the design principles should be applied to all scales of development. However, it is noted that additional guidance on development in smaller-scale settlements within the district would be of use, particularly to community groups preparing neighbourhood plans in smaller villages. The Council will review the need for this type of guidance and the potential to prepare additional guidance on this in light of the scope of the neighbourhood plans currently under preparation.

### **The following changes will be made in response to the consultation:**

None

## **DES2: Enhancing Local Character**

Overall 3 people commented on this policy:

- Support 1
- Comment 0
- Object 2

The following key themes were identified in response to this policy:

- a) Agreement that new development must demonstrate how the design has been informed by and responds to the site and surrounding area.
- b) The need for the policy is questioned given that the details required can be included within a Design and Access Statement, which is a requirement of Policy DES3.
- c) The allocation of Chalgrove Airfield does not reinforce place-identity by enhancing local character.

### **The Council's summary response to the main themes**

Policy DES2 sets out the requirement for a contextual analysis to ensure that new development takes account of the positive features within and surrounding a site including the positive features of the local character. This requirement is not in addition to the Design and Access Statement required by Policy DES3 and the supporting text to the policy recognises this by setting out that this detail should be included within the Design and Access Statement. To keep the policies clear and concise, this policy has been included to set out exactly what is required of a contextual analysis and what information should be taken into account as part of its preparation.

All of the design policies apply to the strategic allocations made in the plan, including Chalgrove Airfield. The proposed development at Chalgrove Airfield would need to demonstrate that it has met the requirements of Policy DES2. There is no evidence that a development at Chalgrove Airfield cannot meet the requirements of Policy DES2. This will be considered in detail at the application stage.

### **The following changes will be made in response to the consultation:**

None

### **DES3: Design and Access Statements**

Overall 3 people commented on this policy:

- Support 1
- Comment 1
- Object 1

The following key themes were identified in response to this policy:

- a) The policy should refer to other key design guidance, such as the County Council's Cycling Design Standards (2017), Walking Design Standards (2017) and Residential Road Design Guide 2<sup>nd</sup> Edition (2015).
- b) The policy should set out which applications require a Design and Access Statement.

### **Historic England**

Welcomes and supports the policy as part of a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment.

### **The Council's summary response to the main themes**

There are many guidance documents that should be taken into account when designing new development. The requirement for a Design and Access Statement is set out in the Council's validation checklist and the Plan will include reference to this in the supporting text.

### **The following changes will be made in response to the consultation:**

Reference to the checklist of requirements when submitting a planning application (validation checklist) will be included in the supporting text.

#### **DES4: Masterplans for allocated sites and major development**

Overall 3 people commented on this policy:

- Support 1
- Comment 2
- Object 0

The following key themes were identified in response to this policy:

- a) Specific support for the requirement to demonstrate the careful siting of community facilities including education/training facilities.
- b) The policy should be more flexible with regards to masterplans for outline applications by recognising that development may be subject to change at reserved matters.

#### **Historic England**

Welcomes and supports the policy as part of a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment. Recommended an additional requirement for a Masterplan to be based on a full understanding of the significance or special interest of the historic environment as it relates to the site including above and below archaeological remains and other heritage assets on the site or within the setting of which the site lies, and the conservation and enhancement of those remains or assets and significance or special interest.

#### **The Council's summary response to the main themes**

Support for the policy is noted. Heritage Assets are protected by policies ENV7 to ENV10. However, it is agreed that it would be helpful to reference the need to consider these assets as part of the masterplanning process.

#### **The following changes will be made in response to the consultation:**

- The policy will be amended to require an illustrative masterplan should to be submitted with outline applications.
- The policy will be amended to take account of heritage assets in the masterplanning process.



**DES5: Outdoor Amenity Space**

No responses to this policy were received.

**The following changes will be made in response to the consultation:**

None

**DES6: Residential Amenity**

Overall 1 person commented on this policy:

- Support 0
- Comment 0
- Object 1

The following key theme was identified in response to this policy:

This policy or a separate policy should set out clear requirements to protect noise sensitive properties from noise pollution resulting from new development.

**The Council's summary response to the main themes**

Policies ENV11 and ENV12 of the Publication Local Plan set out our approach to noise pollution, both in terms of existing land uses on new development and new development on potential receptors.

**The following changes will be made in response to the consultation:**

None

### **DES7: Public Art**

Overall 2 people commented on this policy:

- Support 0
- Comment 0
- Object 2

The following key themes were identified in response to this policy:

- a) The policy is not justified by evidence.
- b) The evidence base does not include a viability study and subsequently the policy should include a viability clause.
- c) The policy is inconsistent with national policy. There is no evidence to show how this policy would meet the tests set out in the National Planning Practice Guidance (CIL tests).
- d) The delivery of public art should be considered on a case by case basis.

### **The Council's summary response to the main themes**

The importance of public art in design and place-making for new development is recognised at Paragraph: 018 Reference ID: 26-018-20140306 of the NPPG. A viability assessment has been prepared which includes every policy within the Local Plan. The viability assessment does not identify this policy as creating any viability issues.

Public Art is an integral part of good design. Like good design, the delivery of high quality public art is directly related to a development and the requirements of the policy should ensure that the public art delivered is fairly and reasonably related in scale and kind.

### **The following changes will be made in response to the consultation:**

None

### **DES8: Efficient use of resources**

Overall 9 people commented on this policy:

- Support 0
- Comment 3
- Object 6

The following key themes were identified in response to this policy:

- a) In line with the Government's Housing White Paper this policy should seek to maximise the use of land by increasing the density requirement for new development. A suggestion is made for a requirement of 60dph.
- b) The policy as written will not deliver more sustainable/energy efficient housing.
- c) The policy should not maximise the density of development as this can spoil the character and heritage of villages.
- d) The standards for energy efficiency in new development are set out in Building Regulations. Given this, this policy is a duplication of other legislation and is unnecessary. It should be removed from the plan.
- e) The policy should include requirements to protect groundwater quality.

### **The Council's summary response to the main themes**

In accordance with the Government's Housing White Paper the policy seeks to maximise the use of land and sets a minimum density. In response to the consultation further guidance on density will be included within the Plan at Policy STRAT5: Residential Densities which advises density expectations for major development based on the location of the development. In addition, the minimum density to be achieved across the district for major development has been raised to 35dph. The policy also encourages high quality, high density development that minimises land take. The minimum density requirement seeks to protect the local character and heritage of development by requiring that local circumstances are also taken into account including local character. The character and heritage of villages are also protected by policies DES1, DES2 and ENV7 to ENV10.

To ensure that energy efficiency is given due consideration in the design of new development the policy also sets out a number of energy efficiency related requirements. These requirements do not directly repeat the standards set out in building regulations nor do they go above and beyond those standards and have been included to encourage the consideration of a full range of energy efficiency measures from the outset. The policy also requires that new development does not result in a deterioration of, and where possible, achieves improvements in water quality. To aid clarity, it is agreed that groundwater could be mentioned more specifically within the Plan.

### **The following changes will be made in response to the consultation:**

- The policy will be amended to include the requirement to make provision for the protection of natural resources where applicable;
- Achievement of minimum densities will take account of protection of the local environment in addition to local circumstances access to local services and facilities and local character;
- A new strategic policy will be included in the revised Plan to specify the density to be achieved by major development dependent on its location;
- Reference to groundwater quality will be included within the policy;

- The supporting text will be amended to note that aquifers within South Oxfordshire support strategically important public drinking water supply abstractions. Policies will seek to ensure that essential water resources are protected from derogation and pollution. Where required references will be made the Environment Agency, Source Protection Zone mapping and their guidance “The Environment Agency’s approach to Groundwater Protection”.

### **DES9: Promoting Sustainable Design**

Overall 5 people commented on this policy:

- Support 1
- Comment 1
- Object 3

The following key themes were identified in response to this policy:

- a) There should be reference to the energy efficiency standards set out in Building Regulations being under review.
- b) The Council should not be building any homes that are not zero or negative carbon if the Council is to meet carbon obligations of 80% reduction in greenhouse gases by 2050.
- c) Recognition that it is not within the Council's power to require higher energy efficiency standards.
- d) To reduce the number of inefficient homes being built the Council should not build more homes than are shown to be necessary by the Government's latest calculation for Objectivity Assessed Need.
- e) The policy should set actual standards. It should look to exceed the standards set out in Building Regulations.

### **Historic England**

Welcome and support the policy as part of a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment.

### **The Council's summary response to the main themes**

The Council does not have the power to require higher energy efficiency standards than those set out in Building Regulations. Optional technical standards can only be set by the Council with regards to accessibility, water efficiency and space standards. The Council has adopted the higher optional standards for accessibility and water efficiency.

### **The following changes will be made in response to the consultation:**

The Government's zero carbon buildings policy has been withdrawn, therefore references within the policy will be removed.

## **DES10: Renewable Energy**

Overall 4 people commented on this policy:

- Support 1
- Comment 0
- Object 3

The following key themes were identified in response to this policy:

- a) This policy should refer to renewable and low carbon energy associated infrastructure, for example battery based energy storage, as well as generation.
- b) The supporting text should refer to the Climate Change Act 2008 given our departure from the EU.
- c) Reference to 'the visual amenity of the Green Belt' should be removed as it implies that this will be given additional weight, which is contrary to national policy.
- d) The policy is weak and needs to be more positive. More emphasis is placed on the conditions that should be fulfilled to allow renewable and low carbon energy schemes than the encouragement to deliver them.
- e) The policy should specifically refer to the impact of noise and vibration in relation to protecting residential amenity from adverse impacts.

## **Historic England**

Welcomed and support the policy as part of a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment.

## **The Council's summary response to the main themes**

It is agreed that it would be positive to extend this policy to encourage the delivery of infrastructure associated with renewable and low carbon energy as well as its generation. It is also agreed that reference to the Climate Change Act 2008 would be valuable.

It was not the intention to give additional weight to the visual amenity of the Green Belt and this will be clarified. The policy seeks to encourage the delivery of renewable and low carbon energy schemes while ensuring that these schemes, which can result in a range of significant impacts, do not adversely impact upon the existing environment and/or residents.

Policies ENV11 and ENV12 of the plan set out our approach to noise pollution and vibrations, both in terms of existing land uses on new development and new development on potential receptors.

## **The following changes will be made in response to the consultation:**

- Reference to infrastructure associated with renewable and low carbon energy will be added to the policy.
- Reference to the Climate Change Act 2008 will be made within the supporting text.
- Reference to the visual amenity of the Green Belt will be removed from the policy.

## **Chapter 10: Town Centres and Retailing**

### **TC1: Retail in towns and villages**

Overall 6 people commented on this policy:

- Support 1
- Comment 1
- Object 4

The following key themes were identified in response to this chapter:

- a) Policy does not make provision for the parking needs of town centres, contrary to paragraph 40 of the NPPF. Policy TC1 only includes a reference to seek to improve access and movement for all users. Parking in Thame is problematic especially on market days.
- b) Policy should be amended to support the provision and management of additional public car parking, together with improvements to public transport to meet the needs of the local community and visitors to the town centre.
- c) Question why Henley has been elevated as a 'Major Town' alongside Didcot, when the rest of the Local Plan refers to Henley as a market town alongside Wallingford and Thame. Didcot is clearly a focus for growth, and as such the retail hierarchy should be revised to designate only Didcot as a 'Major Town Centre' and group the three market towns as 'Town Centre'.

### **Historic England**

Welcomes the requirement in this policy to reinforce the local distinctiveness of the district towns as part of the positive strategy for their conservation and enjoyment of in line with paragraphs 126 and 157 of the NPPF.

### **Chalgrove Parish Council**

Provision of Chalgrove as a strategic site will result in a conurbation larger than the three market towns. STRAT9 indicates that 3,700 sq. ft. of retail space should be provided, however this is a fraction of the retail space available in the three market towns. Policy TC1 does not address this as it refers to Chalgrove as a local centre rather than a town. The Plan is unsound as without sufficient retail infrastructure in a settlement that already relies on private vehicles, the number of car journeys will be increased significantly and the development will not be sustainable.

### **The Council's summary response to the main themes**

The update to the Retail Study was commissioned in 2017, the update included looking at the requirement for retail capacity in the strategic locations for housing growth. This was undertaken to ensure that the needs of the new residential populations are fully met. The update to the study found that the indicative requirement for Chalgrove up to 2033, including convenience goods (food) and comparison goods (non-food) is 4,300 square metres.

Oxfordshire County Council as highways authority, lead on highways matters which includes parking. All applications will be considered and determined in accordance with Local Plan the South Oxfordshire Design Guide and Oxfordshire County Council Parking Standards. It is considered that Policy TRANS2 sets out sufficient detail in respect of promoting sustainable transport and accessibility.



It is acknowledged that throughout the plan, Henley-on-Thames, Thame and Wallingford are all referred to as 'market towns', whilst Didcot is referred to separately. However, for the purposes of retailing, both Didcot and Henley-on-Thames serve both a local and wide catchment area, whilst Thame and Wallingford serve a local catchment area. As such, it is reasonable to make this distinction with reference to the retail hierarchy.

**The following changes will be made in response to the consultation:**

- Retail policies will be reviewed in accordance with NPPF 2018 and the plan will set out overall comparison and convenience floorspace requirements over the plan period.
- The Policies Map will identify the boundaries of the four town centres.
- The strategic allocation policies will require an appropriate provision of convenience retail floorspace in accordance with the retail hierarchy set out in the revised Plan.

### **TC3: Retail Frontages and Town Centre Boundaries**

Overall 1 person commented on this policy

#### **Thame Town Council**

The plan inconsistent with national policy. Town Centres have not been defined in a way that is compatible with the NPPF Glossary definition. This policy appears to be restricting the town centre to only the part that encompasses the primary shopping area. Whereas, the NPPF includes areas adjacent to the primary shopping area that is predominantly occupied by Town Centre uses. This also includes the boundaries of local and district centres. The policy should be reworded so that town centres are defined in line with the NPPF Glossary definition.

#### **The Council's summary response to the main themes**

The Plan was consistent with national policy in the form of NPPF 2012 in defining both primary and secondary frontages, together with town centre policy areas where retail development will be predominantly focused. In accordance with NPPF 2018 the revised plan will identify town centre boundaries and primary shopping areas.

#### **The following changes will be made in response to the consultation:**

The revised plan will identify town centre boundaries and primary shopping areas in accordance with NPPF 2018.

## **Chapter 11: Community and Recreational Facilities**

### **Policy CF1: Safeguarding Community Facilities**

Overall 22 people commented on this policy:

- Support 0
- Comment 2
- Object 20

The following key themes were identified in response to this policy:

- a) The policy does not comply with NPPF para 75. Public rights of way should be protected, with reference made to their historic and landscape value. In addition, national trails, urban and rural public footpaths, bridleways and byways should be protected; they provide economic, health and environmental benefits. The policy should seek opportunities to improve the condition and attractiveness of these routes as well as to add new connections to the network.
- b) The supporting text should refer to the Sustainable Transport Study which indicates that a significant proportion of travel to work journeys are less than 5km, and of these nearly half are made on foot or by bicycle. Walking and cycling links should be increased and improved in areas where significant growth is proposed.
- c) The plan fails to make adequate provision for new community facilities within and connected to new developments. These include community halls, sports and recreation facilities and public houses.
- d) The policy should define what the council considers to be an essential community facility or service.

### **NHS Property Services**

Concern that where “healthcare” is included in the definition as a ‘community facility’, overly restrictive policies aimed at preventing the loss or change of use of community facilities and assets can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. The disposal of unneeded / unsuitable healthcare facilities for best value can be prevented or delayed. This has a direct impact on the provision and quality of healthcare facilities and services, as it can prevent or delay the reinvestment of capital in modern and fit-for-purpose facilities and require ongoing revenue to be spent on maintaining inefficient parts of the estate. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.

### **Oxfordshire Clinical Commissioning Group**

The major housing growth planned across the South will have a significant impact on the provision of Primary Care services that are commissioned via the CCG. An essential part for the CCG is to continue to ensure good access to Primary care facilities are readily available for the residents of the new and expanded housing areas. To do this effectively the local practices affected by large scale housing growth will need access to developer funding. Any housing growth will have impact on the service delivery of Primary Care commissioned services. Some of the local GP practices may or may not be able to re-configure or expand to absorb the new population as this will depend on their estates position and availability of workforce.

If a practice was able to expand they would need developer funding to support any estates work required.

#### **Clifton Hampden and Burcot Parish Council**

The plan fails to adequately protect Assets of Community Value from loss resulting from redevelopments, specifically, planning applications seeking change of use to housing in accordance with NPPF Para 70.

The Local Plan should be amended to specify Asset of Community Value listing status as a Material Consideration for planning applications. The suggestion to include ACVs as a Material Consideration was a recommendation by House of Commons Communities and Local Government Committee in 2014/15 please see second paragraph of the Summary on page 3 <https://publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/262/262.pdf> The loss of community assets has been a major concern in Clifton Hampden.

#### **Drayton St Leonard Parish Council**

The plan fails to adequately protect Assets of Community Value from loss resulting from redevelopments in accordance with NPPF Para 70.

#### **East Hagbourne Parish Council**

Policy CF1 should be amended to specify Asset of Community Value listing status (described in Page 183 Para. 11.6) as a Material Consideration for planning applications in accordance with the 2014-15 House of Commons Communities and Local Government Committee recommendation: <https://publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/262/262.pdf>

Many pubs and other community facilities have been nominated and listed as Assets of Community Value (ACV) with the hope of protecting the asset for the continued use by the Community. However, ACV listing is currently NOT a Material Consideration in South Oxfordshire District Council's. It is up to individual authorities to decide whether or not to include ACV listing as a Material Consideration in planning applications - it is not a requirement. If ACV listing was a Material Planning Consideration, it would afford additional protection against unwanted Change of Use development and strengthen SODC's commitment to maintaining and promoting healthy local communities in line with National Policies. To this end, Henley Town Council will be proposing this change through the South Oxfordshire Local Plan Public Consultation.

#### **Ewelme Parish Council**

The plan fails to adequately protect Assets of Community Value from loss resulting from redevelopments in accordance with NPPF Para 70.

#### **Great Haseley Parish Council**

Policy CF1 should be amended to specify Asset of Community Value listing status (described in Page 183 Para. 11.6) as a Material Consideration for planning applications in accordance with the 2014-15 House of Commons Communities and Local Government Committee recommendation: <https://publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/262/262.pdf>

## **Great Milton Parish Council**

The plan fails to adequately protect Assets of Community Value from loss resulting from redevelopments in accordance with NPPF Para 70.

### **The Council's summary response to the main themes**

By definition Public Rights of Way include footpaths, bridleways and byways. Public Rights of Way and National Trails are managed outside of the jurisdiction of the district council. Highway authorities (including Oxfordshire County Council) manage the Public Rights of Way network in partnership with land managers, user groups and local councils. National Trails are managed by representatives of the highway authorities through whose area the Trail passes and other statutory bodies including Natural England, and the Environment Agency.

Although Public Rights of Way are only referred to once in the document, these are protected under legislation outside the jurisdiction of local authorities. However, this does not preclude local authorities from seeking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails as detailed in NPPF 2018 Para 98. Since the provision of improvements is set out in national policy, there is no need for the local plan to restate this.

The Local Plan must be read as a whole and it is considered that point iv) of Policy TRANS2: Promoting Sustainable Transport and Accessibility adequately supports the provision of measures which improve cycling and walking networks within and between towns and villages in the district.

Evidence studies, including the leisure strategy, have been considered by the IDP which identifies where new or expanded sports and recreation facilities will be required due to the amount of growth proposed. Officers are confident that the IDP will identify where additional provision of new community facilities are required to support development and also where deficits are currently experienced.

It has been decided not to list what constitutes a community service or facility. The Assets of Community Value (England) Regulations 2012 infer that ACV can include a property that must have a current or recent use which can be shown to further the social well-being or social interest of the community. Social interests can include cultural, recreational and sporting interests and it can be a private or publicly-owned property. Therefore, given that community facilities and services could form such wide range of uses, it is considered inappropriate to try and list them all in the policy.

Work has been undertaken with the Clinical Commissioning Group to identify which practices would be affected by the amount of proposed growth and this has been identified in the Infrastructure Delivery Plan (IDP). Officers will continue to work with the Clinical Commissioning Group to ensure that health infrastructure is secured over the plan period.

Policy CF1 contains a caveat which states that, *"if suitable alternative provision already exists, a facility will not be considered essential."* Furthermore, point ii) specifies that an essential community facility could be lost if *"it has been determined*

*that the community facility is no longer needed*". Appropriate, detailed and robust evidence would be required to demonstrate this, nevertheless the policy is not overly restrictive.

Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, proposals would satisfy the requirements of Policy CF1.

It is noted that listing an Asset of Community Value (ACV) as a material planning consideration is at the discretion of the Local Planning Authority. It should also be noted that any ACV that had been successfully listed would be considered when determining a planning application in conjunction with all relevant policies in the adopted development plan.

**The following changes will be made in response to the consultation:**  
None.

## **Policy CF2: Provision of Community Facilities and Services**

Overall 2 people commented on this policy:

- Support 0
- Comment 0
- Object 2

The following key themes were identified in response to this policy:

- a) There is a conflict between policy H8 and CF2. If a proposal came forward which detailed a mixture of housing and community infrastructure, it is assumed that the restrictions under policy H8 will not apply. If the community is able to explore the potential for additional housing growth in exchange for improving services and infrastructure (para 28 of NPPF), it is essential that these two policies are not read together, otherwise it is unlikely that any meaningful infrastructure could be delivered.
- b) Plan fails to make adequate provision for new community facilities within and connected to new developments. The policy should require developers to provide such facilities of a number/size commensurate with the scale of development through Section 106 or CIL.

### **The Council's summary response to the main themes**

The local plan will be considered as a whole for decision making purposes; policies are not intended to be mutually exclusive. Instead the aims of each policy must be considered within the planning balance for each application.

With regard to the potential conflicts between policies H8 and CF2 there is flexibility within Policy H8. Any community infrastructure provided as part of a planning application would need to be of an appropriate scale for a 'smaller village' location. Substantial infrastructure provision would not be suitable in these locations in accordance with paragraph 5.37 which states that, "*smaller villages will look to larger villages and towns for a higher level of services and facilities*".

The requirement for new development to provide appropriate infrastructure is set out within Policy INF1. It is unnecessary to repeat the requirements within Policy CF2.

### **The following changes will be made in response to the consultation:**

None.

### **Policy CF3: New Open Space, Sport and Recreation Facilities**

Overall 4 people commented on this policy:

- Support 2
- Comment 0
- Object 2

The following key themes were identified in response to this policy:

- a) Plan fails to address the need for new leisure facilities in the Wallingford Area, specifically the need for a new swimming pool. If this was addressed it would avoid the need to travel to participate in sport and encourage residents to stay within the local area.
- b) No reference to public rights of way and how they should be protected and enhanced contrary to paragraph 75 of the NPPF. Cannot assume that 'recreational facilities' include Public Rights of Way, therefore policy should be reworded to include this explicitly.
- c) Recognition that access by public transport is important, however flexibility should be provided for sites unable to offer access by public transport.

### **Sport England**

Support the policy and believe it will assist in creating active and sustainable communities.

### **The Council's summary response to the main themes**

The Leisure Strategy identified that the area with the highest aggregated unmet demand for swimming pools is around Wallingford. However, it also identifies that those areas which lie more centrally within the district and with access to a car can reach one of the leisure centre pools within 20 minutes' drive. The recommendations in the report looks at balancing the provision of community access with protecting and maintaining existing facilities and to ensure affordability of the facilities to clubs and individuals.

Public Rights of Way are protected under legislation and managed outside of the jurisdiction of the district council. Highway authorities (including Oxfordshire County Council) manage the Public Rights of Way network in partnership with land managers, user groups and local councils. However, this does not preclude local authorities from seeking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails as detailed in NPPF 2018 Para 98. Since the provision of improvements is set out in national policy, there is no need for the local plan to restate this.

The requirements for new development to be appropriately served by public transport and the flexibilities that are appropriate in less accessible rural areas are set out in Policy TRANS2: Promoting Sustainable Transport and Accessibility and Policy TRNS5: Consideration of development proposals. Since the plan is intended to be read as a whole, it is unnecessary to repeat the requirements in CF3.

### **The following changes will be made in response to the consultation:**

Reference to public rights of way will be made within the supporting text.



## **Policy CF4: Existing Open Space, Sport and Recreation Facilities**

Overall 2 people commented on this policy:

- Support 1
- Comment 0
- Object 1

The following key themes were identified in response to this policy:

- a) No commitment to meeting paragraph 75 of the NPPF in respect of public rights of way. The policy clearly refers to, “play facilities and land including playing fields”, it does not explicitly mention public rights of way. Policy should be reworded so that they are included.
- b) Policy should be amended to include bridleways. These are used extensively by horse riders and should be protected.

### **The Council’s summary response to the main themes**

By definition, Public Rights of Way include footpaths, bridleways and byways. Public Rights of Way are managed outside of the jurisdiction of the district council. Highway authorities (including Oxfordshire County Council) manage the Public Rights of Way network in partnership with land managers, user groups and local councils.

Although Public Rights of Way are only referred to once in the document, these are protected under legislation outside the jurisdiction of local authorities. However, this does not preclude local authorities from seeking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails as detailed in NPPF 2018 Para 98. Since the provision of improvements is set out in national policy, there is no need for the local plan to restate this.

It is not considered that Policy CF4 is the appropriate place to refer to Public Rights of Way which have been referenced in Policy CF1. Policy CF4 relates to the provision of formal and informal open space and sports and recreation facilities.

### **The following changes will be made in response to the consultation:**

None

## **Policy CF5: Open Space, Sport and Recreation in New Residential Development**

Overall 4 people commented on this policy:

- Support 4
- Comment 0
- Object 0

The following key themes were identified in response to this policy:

- a) Support aims of policy and will provide amenity greenspace, allotments and children's play areas as part of the allocation of the Chalgrove site.
- b) Agree that new residential development should provide / contribute to open space, sport and recreation facilities unless it is demonstrated that it is not feasible.

### **Sport England**

Supports the policy but believe the wording should be made stronger by including the word "inclusive" as well as accessible when referring to open space.

### **The Council's summary response to the main themes**

It is agreed that the wording suggested by Sport England will help to ensure that it is clear that open spaces should be accessible in terms of location as well as inclusive and will amend the policy as appropriate.

### **Specific policy wording changes (in italics) will be made as follows:**

The policy will be amended to ensure that open space and play facilities are inclusive and accessible.

## **Chapter 12: Monitoring and Review**

### **Monitoring and Implementation**

Overall 4 people commented on this chapter

- Support 0
- Comment
- Object 4

The following key themes were identified in response to this policy:

- a) No indicator to monitor types of transport use in district.
- b) Target for UK section 41 biodiversity areas should be changed from no net loss to net gain, in line with national and local policy.
- c) Employment land use class, quantum and location should be recorded, with the expectation set that there should be no loss of employment land.
- d) Monitoring of historic assets is not effective and will allow the loss of these assets.
- e) Monitoring negative effects of policies is required.

### **The Council's summary response to the main themes**

Indicators will be added to the framework to monitor transport use.

The target for UK section 41 biodiversity areas will be changed to a net increase.

The monitoring framework is in place to monitor the effectiveness of policies. As stated, if development is found to be contrary to policy then a partial or full review of the plan may be required.

It is our intention to monitor employment land and use permitted will be recorded, as set out in the employment indicators. If net changes in employment land indicate that employment policies are not having intended effect, then this would be reviewed and action taken to rectify.

The monitoring framework is in place to measure the effectiveness of policy. Development is managed through the policies in the plan. The indicator for historic assets allows for any change in the number of Listed Buildings, Registered Parks and Gardens, Conservation Areas, Battlefield and sites of archaeological importance including Scheduled Monuments to be measured, and if the evidence is found to be contrary to the policy then the policy may need to be reviewed.

### **The following changes will be made in response to the consultation:**

The monitoring framework will be comprehensively reviewed to ensure that targets are in accordance with policy objectives in light of changes to the NPPF made during 2018.

## **Evidence Base**

### **Sustainability Appraisal**

Overall 30 people commented on this:

- Support 2
- Comment 0
- Object 28

### **Site Specific Comments**

- a) The allocation of Culham is not sustainable or in accordance with the Plan objectives. New services are required to support the allocation.
- b) The provision for major development at Chalgrove contradicts the claim to support and enhance the role of the larger villages as local service centres. The strategic development will create the largest town in South Oxfordshire and Chalgrove should be treated as such.
- c) Social infrastructure for Chalgrove will be needed to ensure that residents do not need to travel for leisure purposes.
- d) Allocation of Chalgrove Airfield is opposed by the villagers, parish council and local member. Transport, highways infrastructure and land availability issues have not been resolved.
- e) The assessment of Chalgrove Airfield is flawed. Findings with regard to health impacts for existing villagers, effects of moving the runway, impacts of school replacement, transport and the amount of brownfield land on site are incorrect.
- f) The assessment fails to acknowledge the sustainable opportunities provided by the site at Bayswater (part of Option 3 Lower Elsfield in the Council's assessment). The only reason for rejecting the site is that it is Green Belt.
- g) Land at Wick Farm compares favourably in sustainability terms to the allocated sites and other sites considered in the SA. Appraisal of Wick Farm should include the following: Proximity to Oxford with potential for good access to existing infrastructure and services; Proximity to Headington and Barton Park which include existing community facilities, retail, schools and medical facilities; Proximity to employment centres including Oxford University Hospitals and Oxford Brookes University; Opportunities to help regenerate a relatively deprived community at Barton; and Potential for good links to the City centre via public transport with potential to provide cycle ways and green infrastructure.

### **Strategy Comments**

- h) No assessment of alternative levels of growth at settlement hierarchy levels has been considered.
- i) The SA fails to properly assess Policy H3 and the ability of each of the market towns to accommodate development. Growth should therefore be directed towards Wallingford as the more centrally located market town in the District.
- j) The SA acknowledges Wallingford as a sustainable Market Town and Henley as having more physical constraints that might impact on its ability to accommodate growth. This is not translated into the requirements set out under Policy H3.
- k) The failure to undertake a sustainability appraisal of the growth options for Thame is arguably a question of whether the Plan is legally compliant.
- l) The assessment of whether further development should be accommodated at Didcot is flawed. A greater range of sites which are capable of delivering

housing to meet the planned levels of development at Didcot should be identified.

- m) There is clearly a conflict between the Strategic Objectives of the Local Plan and the need to address Oxford's unmet need. It has not been made clear how the SA has informed the spatial strategy in this respect.
- n) The rejection of the option of "next to neighbouring urban areas" is unsound as the most sustainable options for accommodating Oxford City's unmet need are those which are adjacent to the urban area of the city.
- o) The published sustainability appraisal makes no consideration of smaller sites (up to 200 units) which could help to meet Oxford's need.
- p) Some of the conclusions within the SA appear to be contradictory: Option 2, for example, is discounted due to the conclusion that it will potentially become a less sustainable commuter-based settlement. The SA disregards the fact that there is potential for both Chalgrove and Berinsfield to have the same effect.
- q) The strategy as drafted is not demonstrably the most sustainable approach, the SA does not present an appraisal of reasonable alternatives, in the context of the plan as a whole. There is a lack of evidence of the Council having appropriately examined reasonable alternatives to inform preparation of the Proposed Submission Local Plan; and there cannot be a full and effective consultation on the Proposed Submission Local Plan.

### **SA Process**

- r) The SA report is not accessible to, and suited to engaging, "the public" in the way envisaged by the Directive (Article 6(1)) and the Aarhus Convention.
- s) The inclusion of a map to show the area proposed for release from the Green Belt would be helpful.
- t) It would be beneficial to clarify the potential capacity of the site that has been assessed.
- u) The implementation of a new site options appraisal methodology without any prior scoping work is contrary to the Regulations.
- v) The scoring system for the strategic site selection process is inconsistent in terms of the consideration of Green Belt sites. The result of this is that the SA fails to provide a fair and consistent comparison between sites and cannot be described as adequate.
- w) The assessment presented in overly high-level, not mutually exclusive, out-of-date, includes straw man options (several of the options are patently undeliverable and/or unsound) and is not focused on the key issues.
- x) The appraisal fails to provide any robust justification for the approach selected
- y) No consideration is given to the negative effects of failing to provide for the right level of housing, indicating the decision to select Option 2 is not based on proper evidence.
- z) The spatial element of Policy STRAT3 is not tested against the SA objectives and will lead to unsustainable development patterns.
- aa) the Sustainability Appraisal indicates that Options 2 and 3 scored the same against each of the 17 objectives despite the clear difference in the amount of housing to be delivered by each option. Accordingly, it would appear that the Sustainability Appraisal does not highlight any difference in effect between the two options. Option 2 has no spatial planning premise and is founded purely on an uninformed division of the "working assumption" of unmet need.

### **Additional Comments**

- bb) The call for sites process was flawed.
- cc) All monitoring indicators should be SMART.
- dd) Enhanced bus services are not practical in rural areas.
- ee) The Council's full apportionment of Oxford's unmet housing need should be the subject of a separate SA.

### **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

The SA considers a major housing developments at Lower Elsfield (option 3), Wick Farm (option 4), Thornhill (option 5) and Harringdon (option 6). We welcome that these options are not being pursued although we note that this is mainly for Greenbelt reasons.

The SA rightly identifies that development at Wick Farm, Lower Elsfield and Thornhill would have "significant negative effects" on biodiversity and we would be very concerned if these sites had been allocated. The proposed Wick Farm site extends to the boundary of Sydlings Copse SSSI raising concerns about direct and indirect impacts on this nationally important site and nature reserve, in particular with regard to increased recreational pressure.

The proposed allocation at Lower Elsfield adjoins the Wick Farm site to the northwest. Development on this site would raise the same concerns about Sydlings Copse SSSI as Wick Farm, but in addition would also raise serious concerns about direct and indirect impacts on Woodeaton Wood SSSI, Woodeaton Quarry SSSI and several Ancient Woodlands (AW), some of which are also designated as Local Wildlife Sites (LWS). Similarly, development at Thornhill would be in close proximity to Monkswood Grassland LWS, Shotover SSSI and CS Lewis nature reserve, all of which would be likely to come under increased recreational pressure potentially significantly impacting on the nature conservation interest of these sites. Development at Harringdon Junction 7/M40 would potentially affect Spartum Fen SSSI and Godwin's Copse AW raising concerns about this allocation.

### **Highways England**

Note the update to the SA and support the inclusion of Objective 6 and the stated "need to ensure that new development is accessible to a range of community facilities and services and jobs so as to reduce the need to travel". Highways England is supportive of this, as it aligns with the NPPF and also Circular 02/2013. We would welcome the opportunity to work with the Council on any future transport modelling work looking at impacts on the Strategic Road Network.

### **North Wessex Downs AONB**

Policy H1 should be revised. It should be clear that housing development should not encroach into open countryside risking harm to the natural beauty of AONBs and their settings. There is no appropriate assessment of potential cumulative impact development arising from the STRAT policy allocations on the natural beauty of the North Wessex Downs AONB and its setting. Such assessment should take into account impacts from this Plan and Local Plans of neighbouring planning

authorities. The lack of an appropriate assessment of cumulative impacts on the North Wessex Downs AONB and its setting should be addressed in an enhanced and extended SA/SEA, which in its present form is inadequate.

### **Oxfordshire County Council**

The rigour of the sustainability appraisal is questioned. With regard to transport, the sustainability appraisal does not adequately describe the public transport network. The evaluations of Objective 6 relating to travel choice and reducing reliance on private car are questionable - all strategic sites are awarded top marks. There are clear genuine differences between the sites in this respect. For sites that should score lower, unspecific or unproven interventions are given as reason for awarding top marks.

### **Cherwell District Council, Oxford City Council, West Oxfordshire District Council Joint Response**

The adopted strategy for the plan implies that housing in any location within South Oxfordshire could be asserted as counting towards Oxford's need, even though they might be in relatively remote or inaccessible from Oxford, particularly by public transport. Moreover, the Plan states that all of its housing supply, including housing to contribute towards Oxford's unmet needs, will be delivered in accordance with SODC's own spatial strategy, which seeks to build upon the existing settlement hierarchy. The hierarchy only considers settlements within South Oxfordshire and does not acknowledge the urban area of Oxford City adjoining its boundary, nor the influences that Oxford has as an economic and services centre for the county. This strategy for spatial distribution does not appear to have been tested against other reasonable alternatives for meeting Oxford needs to justify whether the Plan is taking forward the most appropriate or sound strategy.

The Overall Strategy should be amended to reference meeting Oxford's unmet needs at suitable locations. It is not appropriate or sustainable to meet needs for Oxford through a policy and strategy which does not consider the needs of those future residents. In assessing and allocating sites to specifically meet Oxford's unmet need, there must be clear consideration of the spatial relationship and sustainable travel links to Oxford, and consideration of the joint Growth Board evidence base upon which the Growth Board is progressing its strategic working and which all of the councils have been party to.

### **Chalgrove Parish Council**

The call for sites process involved representatives from seven of the eight sites being invited to present to SODC. The plan is legally unsound if it failed to fairly review all of the potential sites.

The reasons for choosing Culham over any of the other green belt sites are not explained. Grenoble Road is close to existing infrastructure and employment. Northfields is close to existing infrastructure and employment. Wick Farm is close to existing infrastructure and employment. Culham has limited infrastructure in the form of a single A road and a single track railway line, and the employment potential is under threat. The exceptional circumstances that separate Culham from Northfields, Wick Farm, Lower Earlsfield, Thornhill and Grenoble Road are unclear.

For STRAT9, the new health facility would replace an existing facility and relocate it much further away from existing residents. There is therefore no positive contribution and the information is misleading. The provision of a secondary school will necessitate the closure of the existing Icknield school in Watlington. There would be insufficient pupil numbers to support two schools. Replacing one school with another does not constitute a positive effect, nor is the closure of an existing facility recognised.

Provision of a new runway for Martin Baker could impact on this feature, so uncertain effects are identified. Three pertinent points: 1) Martin Baker Ltd do not want a new runway, or the runway moved. This has not been identified in the SA. 2) The estimated cost of a new runway is £12 million. This has not been identified as a cost, or a negative effect. 3) The relocation of the runway as planned will result in direct overflights for residents of Warpsgrove. This is also not identified as a negative effect, nor a potential threat of injury or loss to life.

The SA states, "In the case of STRAT9 the majority of land used is previously developed". This is not true. The only previously developed land is the site of the existing runway and bunkers. All other land, by far the majority, is undeveloped agricultural land. The developed land takes up between 10% and 15% of the site. The statement in the SA is false, and therefore must be considered unsound.

The Sustainability Appraisal shows that Chalgrove Airfield is one of the least sustainable sites on the list. The fact that transport is called out as a specific positive effect is clearly an error, given the lack of road infrastructure and lack of public transport options. Fundamental errors like this show that the SA is flawed, and as this is what the site selection is based on, it shows that the site selection itself is flawed, and therefore unsound, and potentially subject to legal challenge.

In order for the Plan to be deemed legally compliant and sound, Chalgrove Airfield would need to be taken out for the following reasons: - the land is NOT available, going against the policies in the plan which state that the land must be available at the time the plan is formed - the proven risk to life in building so close to the runway, as provided in our previous consultation responses which have been ignored. We suggest that Chalgrove Airfield be removed from the Local Plan, and sites at Grenoble Road, Northfield, Wick Farm, Lower Elsfield and Thornhill should be reconsidered, all of which are available.

### **The Council's summary response to the main themes:**

Detailed responses to the comments raised with regard to the sustainability appraisal process have been provided within the Sustainability Appraisal of the Final Publication Version (second) 2019.



## **Habitats Regulations Assessment**

Overall 1 person commented on this:

- Support 0
- Comment 1
- Object 0

## **Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

The Habitats Regulation Assessment (HRA) considers potential impacts of the South Oxfordshire Local Plan on Special Areas for Conservation (SAC) including Aston Rowant SAC, Chilterns Beechwoods SAC, Cothill Fen SAC; Hartslock Wood SAC, Little Wittenham SAC and Oxford Meadows SAC.

During the previous consultation BBOWT raised concerns about the HRA's conclusion that the Local Plan would not cause significant recreational impacts on Aston Rowant SAC and Cothill Fen SAC. We note and welcome that LUC have revisited this issue and have also sought Natural England's view on this. This has confirmed LUC's initial assessment and we accept the arguments being put forward. However, it is our experience as managers of several designated sites in the three counties that recreational pressures from developments are difficult to quantify and are often underestimated. Considering the amount of development coming forward not only in South Oxfordshire but also in the neighbouring districts some of our concerns about recreational impacts on designated sites (including Aston Rowant SAC and Cothill Fen SAC) still remain.

Having said this, we are guided by NE's judgement on this (recreational impacts) as well as on effects on hydrology, air quality and in combination effects for these European sites. However, we would ask that appropriate monitoring is carried out for all the above mentioned SACs with regard to recreational pressure and air quality pressure to help build an evidence base that can be used when assessing the potential impacts of developments in the future.

## **The Council's summary response to the main themes**

The monitoring framework for the Plan includes the following indicators that aim to monitor impacts on sites of biodiversity importance: Change in areas of UK41 priority habitats, Change in number of UK41 priority species, Distribution and status of farmland birds, Distribution and status of water voles, Changes in areas of non-agri-environmental biodiversity gains, Conditions of SSSIs and other areas of landscape and biodiversity importance. In addition, National Indicator NI186 will monitor CO2 emissions.

It is considered that the monitoring framework adequately addresses the key indicators for air quality and impacts of recreational pressures required in relation to designated sites.

There will be an update to the HRA undertaken to support the revised version of the Local Plan.

## **The following changes will be made in response to the consultation:**

None

## **Equalities Impact Assessment**

Overall 1 person commented on this:

- Support 0
- Comment 1
- Object 0

The following response was made to the assessment:

Question whether it is a right for young people to have a roof over their heads.

### **The Council's summary response to the main themes**

The plan sets out an approach to meeting the housing needs of all members of the community with a quantum of development that aims to meet the needs identified in the 2014 Strategic Housing Market Assessment (SHMA) plus an uplift in the amount of housing provided in accordance with the Oxfordshire Housing and Growth Deal. The SHMA takes into account the needs of all age groups. The Plan also includes Policy H9: Affordable Housing which aims to maximise the affordable housing availability in the district. By increasing the amount of affordable housing, young people will be more able to access homes without encountering the significant barrier of cost.

### **The following changes will be made in response to the consultation:**

None

## **Strategic Housing and Employment Land Availability Assessment**

Overall 3 people commented on this:

- Support 1
- Comment 1
- Object 1

The following key themes were identified in response to this policy:

- a) Confirmation that site reference 1227 is available as was previously raised in response to the May 2017 consultation.
- b) The assessments for sites 910, 944 and 1340 are supported and the sites confirmed as available.

### **Oxfordshire County Council**

The Strategic Housing and Economic Land Availability Assessment (SHELAA) has not been reviewed in detail, but it is noted that in some cases it assesses sites positively although they are not proposed for allocation. This does not in any way restrict comments from the County Council in future should sites be proposed for allocation or planning applications made. It is also noted that in some cases the SHELAA assessment is that sites are not suitable for development and the County Council may disagree with that. The County Council's Property response which includes comments disagreeing with the analysis of sites 891 and 892 is sent separately.

### **The Council's summary response to the main themes**

Support for the assessment is noted.

The availability of site 1227 is noted and will be amended on update of the SHELAA. The County Council's response to the assessment of sites 891 and 892 will be considered when the SHELAA is updated.

### **The following changes will be made in response to the consultation:**

None

**Appendix 1, 2, 3, 4, 5, 6 and 7**

No comments were received on these appendices

**The following changes will be made in response to the consultation:**

None

## **Appendix 8**

Overall 2 people commented on this appendix:

- Support 0
- Comment 0
- Object 2

The following key themes were identified in response to this appendix:

- a) Detailed information is required in regards to the housing trajectory and sites.
- b) The approach to determining the housing trajectory should be set out.
- c) An updated housing land supply position is required to show that the Council will have a 5-year supply on adoption of the Local Plan.
- d) Difference in emerging Local Plan Housing Trajectory Graph in Housing Topic Paper and Publication Version of the Local Plan.

### **The Council's summary response to the main themes**

The submission local plan will be accompanied by an updated housing topic paper. This will detail the approach to the determination of the annual housing requirements, provide an up to date 5-year housing land supply position, set out how past undersupply have been treated, provide the individual site trajectories for all developments in the district of 50 dwellings or more that are included in the housing supply and set out the approach to determining when smaller sites in the supply are expected to contribute.

It is our intention to update information relating to the housing trajectory close to the submission date of the plan in order to show the most up to date position for South Oxfordshire.

It is noted that there is a difference in the trajectory graphs shown in Appendix 8 of the Local Plan document and in the housing topic paper; both will be updated on submission of the Local Plan to provide up to date position.

### **The following changes will be made in response to the consultation:**

Tables 5c, 5d 5f and the trajectory graph at Appendix 8 will be updated in the revised Plan.

**Appendix 9, 10, 11, 12, 13 and 14**

No comments were received on these appendices

**The following changes will be made in response to the consultation:**

None

## Appendix 1 - A copy of the letter text and Regulation 19 Statement of Representations Procedure Notice sent to consultees



### STATEMENT OF REPRESENTATIONS PROCEDURE UNDER THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (REGULATIONS 19 AND 35)

#### Subject matter and area covered

South Oxfordshire District Council is developing a new Local Plan. The South Oxfordshire Local Plan 2033, together with its supporting studies, sets out our vision for South Oxfordshire up to the year 2033. The documents identify where housing, retail and employment land should be located as well as the infrastructure required to support this growth, such as new roads, schools, health services and sewerage.

#### Periods for representations

The publication version of the plan, along with the supporting documents, are subject to a six-week publicity period from **Wednesday 11 October until 5pm on Thursday 30 November 2017**. Late responses cannot be accepted, nor can extensions be granted.

#### Details for representations

The plan, supporting documents and evidence papers are available to view and download at [southoxon.gov.uk/newlocalplan](http://southoxon.gov.uk/newlocalplan). If you do not have access to the internet, you can view documents at the following locations during their usual opening hours:

- SODC council office at 135 Eastern Avenue, Milton Park, Abingdon, OX14 4SB.
- Public libraries in Benson, Berinsfield, Chinnor, Didcot, Goring, Henley, Sonning Common, Thame, Wallingford, Watlington, Wheatley and Woodcote.
- Abbey House Abingdon, Abbey Sports Centre Berinsfield, Chalgrove Post Office, Clifton Hampden Post Office, Cornerstone Didcot, Culham Science Centre and Didcot Wave Leisure Centre.

Comments can be submitted in the following ways:

- complete our [online comment form](#) (registration is required)
- download a form from our [website](#) and email it to [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)
- collect a form from one of the above locations and post it back to Planning Policy, South Oxfordshire District Council (address above).

#### Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by South Oxfordshire District Council for a period of 6 months after the Local Plan is adopted.