

**South Oxfordshire District Council  
Local Plan 2033: Second Preferred  
Options**

**Consultation Report  
September 2017**



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## Executive Summary

This is the report of the responses to South Oxfordshire District Council fourth round of consultation on the emerging local plan 2011 – 2033.

The consultation was held between March and May 2017.

The areas that received the most comment were:

1. The Duty to Cooperate and Oxford's unmet housing needs:  
The Growth Board 'apportionment process' has provided a framework but the council has chosen a different approach.  
This is a legal requirement and cannot be resolved through discussion at the examination, as soundness can.
2. Housing numbers  
Mixed reactions across several related subjects  
Communities & campaign groups (too high)  
Developers (too low)  
SHMA – the numbers should be reviewed: original calculations, the age of the document and changes of circumstance ("Brexit" and the housing white paper)  
OAN – top, middle and bottom of the range cited and "full" affordable need.  
Also, should include unmet need  
Potential unmet need from Reading (raised by developers)  
Five year housing land supply – Could it be achieved, and *when*.
3. Our Strategy  
Strategic sites – mixed responses  
Berinsfield – Support the principle of regen. some Green Belt concerns  
Chalgrove Airfield – Objections: remote, unsustainable location.  
Culham – Mixed reaction sustainable location, Green Belt, Abingdon  
There shouldn't be three strategic allocations – development should be spread out over more smaller sites in the district  
Alternative sites  
Support: Harrington, Lower Elsfield, Wick Farm & Thornhill.  
Objection: Harrington & Wick Farm  
Green Belt  
Oxford's unmet need should be met nearer to Oxford  
Concerns about any Green Belt release  
Infrastructure  
Substantial investment in infrastructure would be required for Chalgrove Airfield  
Culham and the provision of a bridge supported  
More detail of the specific infrastructure required to support the proposed growth in the district/site by site  
Support for the proposed bypasses to existing villages but proposed routes need more consideration.



## Introduction

In March 2017, we published our “Local Plan 2033 – Second Preferred Options” consultation document. This was the fourth step in creating a new Local Plan for the district.

We have previously consulted:

1. Issues and scope (consultation one - June 2014)
2. Refined options (consultation two - February 2015)
3. Preferred options (consultation three - June 2016)

The second preferred options was a substantive draft local plan including a draft vision, draft objective, policies and site allocations. We sought questions on every aspect of the plan and particularly the draft policies.

In this report, we go through the Second Preferred Options consultation document policy by policy and set out the main issues which were raised by respondents. We respond to those main issues. You can see all of the submitted comments can be seen on the council’s consultation website at

<https://consult.southandvale.gov.uk/portal/south/planning/pol/lp2031/is/lp>.

We have used the comments on this consultation, along with information from a range of studies we have carried out or commissioned, to help us formulate the final version of the Local Plan. This final “publication” version of the plan will be subject to a formal consultation and then be submitted to a government appointed inspector for examination.

## How we consulted

The consultation took place from **29 March to 17 May 2017**, a period of seven weeks. In combination with the three earlier stages, we have consulted on this plan for a total of 27 weeks.

We have endeavoured to ensure that we reached a wide spread of our community with our consultation. Below a breakdown can be found of the different approaches used for the consultation. We have followed the steps set out for consultation in our Statement of Community Involvement (SCI)<sup>1</sup>. We exceeded the statutory consultation requirements for this stage of consultation. The four rounds of consultation that we have held so far have all be 'informal' and are intended to be flexible as long as they follow the some specific requirements (predominantly to do with who we contact) set out in [Regulation 18 of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#).

Our consultation methods are documented and broken down as follows:

Date	Action
27 February	Email issued to all parish councils to inform of consultation dates and invite them to a briefing on the Local Plan.
w/c 13 March	Outlook delivered to every household in South Oxfordshire with front-page article including consultation details and drop-in dates.
21 March	Press release issued to local newspapers announcing consultation and drop-in dates. Press release issued to all parish councils requesting that they update their websites / parish newsletter with the events.
w/c 27 March	Press adverts published in local newspapers. Pack of publicity material issued to all parish councils with posters / leaflets advertising the events, for display around the villages/towns.
28 March	Email / letter notifications issued to everyone registered on our database or who commented on previous Local Plan consultations. Update to website <a href="http://www.southoxon.gov.uk/newlocalplan">www.southoxon.gov.uk/newlocalplan</a> Dedicated consultation page live Two separate briefing sessions held, the first for district councillors, the second for town / parish councils and neighbourhood planning groups.
29 March	Copies of the Plan, supporting documents and comment forms available to view in libraries and leisure centres across the district, plus Culham Science Centre and Clifton Hampden and Chalgrove Post Offices.
w/c 3 April	Facebook adverts for Didcot and Thame drop-in events.
5 April – 22 April	Public drop-in sessions held in Didcot, Wallingford, Thame and Henley.

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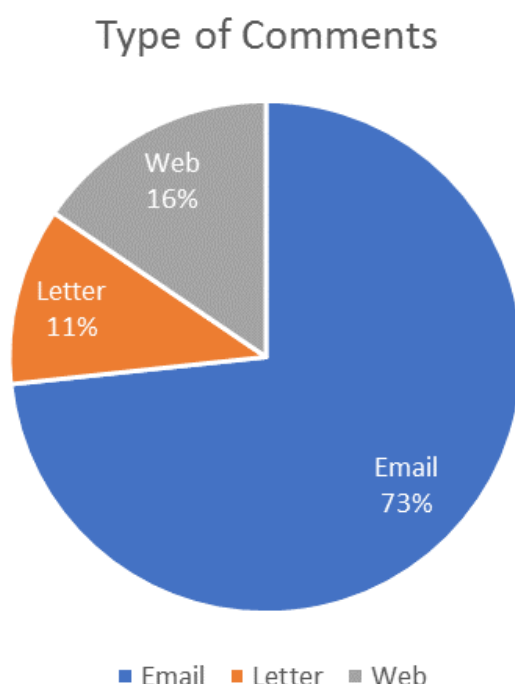
<sup>1</sup> Statement of Community Involvement (SCI): <http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/our-development-plan/community-involvement>



## Response to the consultation

In total we received 7,666 comments from 1369 contributing consultees. This represented a similar level of response to the first preferred options consultation. At the exhibitions we answered questions, and also collected comments and these have been incorporated into our reporting of each corresponding policy from the consultation document.

The proportion of responses received via email far outweighed any other form of communication, we received some responses directly through our online consultation portal and we also accepted 'hard copy' letters. The overall breakdown of responses can be seen in Figure 1.



**Figure 1: *Methods used to respond to the consultation.***

## **Responses to consultation – by chapter**

### **Foreword**

Overall 74 people commented on this chapter

- Support 0
- Comment 64
- Object 10

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

1. Considered that the desire to let communities make more decisions for themselves did not align with the proposal of strategic allocations, particularly that of Chalgrove.
2. How is the selection of Chalgrove by the Council a reflection of the community's aspirations?
3. The foreword is disappointing insofar as it fails to recognise the efforts made by Neighbourhood Plan groups

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

It is not considered that the foreword is at odds with the desire to let communities plan for themselves. The Local Plan places a great deal of responsibility in its markets towns and larger villages to provide the level of development expected to be delivered. However, the housing needs for South Oxfordshire and indeed to help towards meeting the unmet needs of Oxford City cannot be met through the market towns and larger villages alone and the spatial strategy also seeks to identify large strategic sites to support housing delivery.

### **Policy/paragraph wording changes will be made as follows:**

Ensure that the foreword reflects that there is a balance to be struck and housing needs should be carefully considered alongside environmental factors and community aspirations.

## **Vision and Objectives**

Overall 367 people commented on this chapter:

- Support 129
- Comment 82
- Object 156

### **Objective 1 – Settlements**

Overall 95 people commented on this policy:

- Support 34
- Comment 20
- Object 41

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

1. The objective is not realised by the restriction to long term growth of settlements
2. Generally, support the aims of the objective and the spatial strategy, development at Didcot & Science Vale supported
3. Needs greater clarity regarding the settlement hierarchy
4. Development at Chalgrove would not align with this objective and disrupt 'our way of life' and give rise to commuting
5. Little regard for older people or wildlife
6. Concern regarding safeguarded access routes and their impact upon the countryside and neighbouring uses.

There were Parish Council responses to this which were generally supportive in terms of the principle of this policy. The support for rural communities was welcomed.

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

### **Policy/paragraph wording changes will be made as follows:**

No changes proposed.

### **Objective 2 – Housing**

Overall 40 people commented on this policy:

- Support 17
- Comment 6
- Object 17

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

1. Support the aims of these objectives

2. Regeneration is supported as a key objective and viability should be a priority
3. There should be a greater dispersal strategy
4. Oxford's unmet need should be met in full
5. Unclear where need for employment land is coming from
6. Should specifically restrict land at risk of flooding from development
7. Housing mix needs to be explained and reflective of demand

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

### **Policy/paragraph wording changes will be made as follows:**

We have amended Obj. 2.1 to refer to including older persons and self-build accommodation but note this is not an exhaustive list

### **Objective 3 – Economy**

Overall 54 people commented on this policy:

- Support 22
- Comment 13
- Object 19

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

1. Objectives are laudable, essential that development locations should be close to existing business areas and where there are good transport connections.
2. Development at Chalgrove is not balanced and more houses will not attract more employment
3. Housing and employment should be considered alongside transport
4. Employment development should be focussed at Science Vale and Oxford City. Oxford should be recognised as a key employer
5. The Local Plan proposes to put Oxford City's overspill in the countryside with no infrastructure
6. Where are businesses coming from?

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

The Local Plan aims to balance housing and employment growth insofar as this is practicable. Development is focussed at Science Vale and at the market towns and larger villages. Development is also located at strategic locations across the District which are well linked to established employment opportunities. It is recognised that there are key employment centres both within and outside the District boundaries, however it would not be planning positively to expect all residents to work outside the area. South Oxfordshire has a relatively contained level of out commuting.

**Policy/paragraph wording changes will be made as follows:**

Make reference to Oxford City as a key employment location, and also Reading and London which have pulls on residents. The level of containment in Oxfordshire should be clarified within the Local Plan.

**Objective 4 – Infrastructure**

Overall 43 people commented on this policy:

- Support 15
- Comment 7
- Object 21

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

1. General support for the provision of infrastructure to support growth, but consider that more detail needs to be provided particularly on a wider area
2. There should be a greater focus on pedestrian and cycle infrastructure
3. Sustainable transport at Chalgrove is not a viable option balanced with the need to recognise that the private car is still an essential item in rural parts of the district.
4. How will national decisions on transport infrastructure impact upon the District, particularly the Oxford to Cambridge Expressway.
5. How deliverable is the necessary transport infrastructure?
6. Concern that large strategic infrastructure items will not be delivered owing to a lack of funding

**Oxfordshire County Council** highlighted the potential funding gap and the work being undertaken to prepare the county wide Infrastructure Strategy and highlighted that the proposed development did not exacerbate the identified gap.

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

Welcome the support for infrastructure to support the level of growth we are planning. However, it should be recognised that there are existing infrastructure deficiencies in the District which cannot be remedied through contributions from new development unless they are related.

**Policy/paragraph wording changes will be made as follows:**

Ensure that Objective 4.2 refers to a range of transport options including pedestrian and cycling facilities

**Objective 5 – Design**

Overall 25 people commented on this policy:

- Support 7
- Comment 6
- Object 12

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

1. Specific reference should be made to the South Oxfordshire Design Guide
2. Development at Chalgrove would not respect the special character of our historic settlements or the surrounding countryside and would not accord with these objectives
3. The proposed bypasses will not respect the character of existing settlements

**Sport England** welcome the objective to deliver well designed homes

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

Development is proposed at Chalgrove Airfield, a partially previously developed site at Chalgrove. The immediate character is of an airfield though it is accepted that the character will change. The safeguarded routes provide the opportunity for further investigation of potential access. These routes are not all fully funded or justified though their inclusion provides the opportunity to explore this further, including the potential impact on character.

**Policy/paragraph wording changes will be made as follows:**

We will refer to the South Oxfordshire Design Guide.

**Objective 6 – Community**

Overall 35 people commented on this policy:

- Support 9
- Comment 11
- Object 15

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

1. Selection of Chalgrove undermines community led neighbourhood planning

2. Concern that strategic allocation at Chalgrove will destroy existing community facilities and may mean the relocation of facilities away from the heart of the community
3. Landowners within strategic allocations and associated with safeguarded routes were not consulted in advance
4. Community facilities are stretched and cannot cope with additional development
5. The objective should be expanded to support sport and recreation and health and wellbeing.

Sport England raised the lack of sport and recreation in the objectives.

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

We recognise that there is a tension between the Neighbourhood Plan at Chalgrove and the proposed strategic allocation. However, the objective to support community led planning is a valid one and we are looking to the market towns and larger villages to propose where, how and when new development should take place. This does need to be balanced against a district wide need for new development and a mix of different sized sites and the opportunities that these can bring in terms of the provision of new infrastructure which might otherwise not be realised. The location of new facilities will need to be carefully considered.

Developers promoting large scale development are expected to bring forward a comprehensive scheme and as part of this the Council expect this to include discussions with landowners. This should ensure that the site assembly process is thorough and would reflect a site which represents the most appropriate pattern of land to be developed. We are aware that some landowners have not been involved in the process and have worked to ensure that this engagement takes place.

### **Policy/paragraph wording changes will be made as follows:**

The objective should be expanded to cover health/well-being and sport and recreation.

### **Objective 7 - Natural and Built environment**

Overall 55 people commented on this policy:

- Support 18
- Comment 14
- Object 23

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

1. Welcome strong support for the natural and historic environment and consider this should be across the district including the often overlooked northern parts of SODC's area. Light and air pollution should be reduced.
2. Unclear how this objective will be met when the Local Plan proposes strategic allocations and levels of development across the District which are 'unsustainable'
3. How will the natural environment be protected or enhanced by bypasses and other constructions? Including conservation areas, orchards etc? Can rail be used as an alternative to roads?
4. The likely impact on wildlife as a result of new development and new roads was also emphasised. Chalk streams, the River Thames and ancient woodlands should be highlighted.
5. We should do more to celebrate our historic assets and the Council should be clear about how this can be supported
6. There has been inadequate examination of alternative sites, risk of flooding and agricultural land.

Several parish councils supported this objective. Historic England supported the positive strategy.

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

Recognise that there needs to be a balance between protecting the natural and historic environment with the need to provide for additional needed development. This impact will be minimised through organic growth at the towns and villages with larger strategic allocations elsewhere. Two of the four strategic allocations will use partially developed land as part of a wider site. Focussing large scale development on fewer locations enables the protection of much of the rest of the District, particularly those areas set in protected landscape designations. Throughout the development of the Local Plan, strategic site options have been considered and tested through the sustainability appraisal. The sites selected and included as proposed strategic allocations within the plan align with the spatial strategy and balance the competing needs of the district.

### **Policy/paragraph wording changes will be made as follows:**

Further reference to Chalk Streams, ancient woodlands and the River Thames will be added to the document to reflect their importance within the district. The assessment of alternative sites will also be clarified within the document, and more specifically in the supporting evidence base.

### **Objective 8 - Climate change**

Overall 20 people commented on this policy:



- Support 7
- Comment 5
- Object 8

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

1. Development at Chalgrove or Harrington will not reduce carbon emissions and reliance on the car will conflict with this policy.
2. Support the principle of the objective
3. A significant number of homes have been built on land at risk of flooding and the effects of climate change are likely to exacerbate this position. The Plan should be clear that development is to be restricted on land at risk from flooding.
4. Where is the mitigation for this objective?
5. Concern that potential bypasses will simply divert rather than reduce traffic in the area.
6. Lack of water is likely to be an issue

Sport England noted the benefit of evening sports activity and lighting outdoor facilities would be a positive rather than negative on health across the district.

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

There are a series of objectives which underpin the Local Plan, which should not be viewed in isolation, but rather should be considered as a full suite of objectives – some of which will be competing. A balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.

Balance of environmental constraints and the requirement for new development should be viewed across the district. The heart of the district has been historically overlooked to some extent and this Local Plan seeks to redress this and focus development and infrastructure in South Oxfordshire's central area.

It is not considered that there is a significant level of homes which are at risk of flooding. The emerging Local Plan is supported by a Strategic Flood Risk Assessment which has guided the location of development to avoid areas at risk of flooding.

The plan includes safeguarded land which provides the opportunity to look at the potential for bypasses. Whilst the point about the diversion of traffic is accepted, this can reduce congestion in those built-up areas which have existing issues which cannot be overcome and to disperse traffic where there are Air Quality issues, thus bringing about improvements to AQMAs.

### **Policy/paragraph wording changes will be made as follows:**

Water scarcity is an issue within South Oxfordshire and this should be expanded upon in the Local Plan having regard to the Water Cycle Study evidence.

### **Paragraph 3**

Overall 107 people commented on this section/paragraph:

- Support 34
- Comment 26
- Object 47

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

1. General support for the vision is identified and the spatial strategy, though others felt that the vision did not highlight the range of challenges which the district faces, particularly in terms of duty to cooperate. Some respondents feel that Oxford's unmet housing need should be met close to the city, whilst others consider that this can be met across the district.
2. Development at Wick Farm has the potential to support healthcare needs and promote healthy lifestyles with easy access by foot and bicycle to Oxford in addition to the development identified in the emerging Local Plan.
3. The approach to Green Belt needs to be completed, in particular to take account of the Oxfordshire Growth Board work which considered that the most appropriate location for sustainable development was at the edge of Oxford. A full review should be undertaken. Others consider that protection of the Green Belt, particularly the setting of Oxford City is of paramount importance.
4. Berinsfield and Chalgrove are not appropriate locations for new development balanced against support for development at the strategic locations.
5. Science Vale is an important focus for the District and the proposals for additional development here are welcomed, including at Berinsfield.
6. It is important that the District's landscape and heritage assets, views and character are not impacted upon by new strategic development. Not all settlements should be treated in the same way. Others stressed the housing delivery crisis and that insufficient importance had been placed upon this.
7. Infrastructure to support the proposed development is critical, though caution is urged to ensure that it is necessary and proportionate.

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

Balance of environmental constraints and the requirement for new development should be viewed across the district. The heart of the district has been historically overlooked to some extent and this Local Plan seeks to redress this and focus development and infrastructure in South Oxfordshire's central area.

It is not considered that there is a significant level of homes which are at risk of flooding. The emerging Local Plan is supported by a Strategic Flood Risk Assessment which has guided the location of development to avoid areas at risk of flooding.

The plan includes safeguarded land which provides the opportunity to look at the potential for bypasses. Whilst the point about the diversion of traffic is accepted, this can reduce congestion in those built-up areas which have existing issues which cannot be overcome and to disperse traffic where there are Air Quality issues, thus bringing about improvements to AQMAs.

**Policy/paragraph wording changes will be made as follows:**

Water scarcity is an issue within South Oxfordshire and this should be expanded upon in the Local Plan having regard to the Water Cycle Study evidence. We will add further text in to highlight the importance of housing delivery. Clarity will be provided to reflect the proposed safeguarded routes and their justification and funding.

## Our Spatial Strategy

Overall 3576 people commented on this chapter:

- Support 1098
- Comment 624
- Object 1854

### Policy STRAT1: The Overall Strategy

Overall 647 people commented on this policy:

- Support 80
- Comment 131
- Object 436

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

1. The overall need for an amended strategy in response to the Strategic Housing Market assessment (SHMA) was questioned. The numbers (and assumptions) in the SHMA were challenged, and its validity especially since the government has consulted on changes to needs calculations and the announcement of “Brexit.”
2. The scale of the spatial strategy attracted comments. Some respondents suggested that it was too grand and questioned its sustainability, whilst others argued there was greater capacity, in the district, for change and the strategy did not plan for enough growth.
3. Infrastructure, services and facilities were of particular importance to many respondents. The ability and capacity of current infrastructure to cope with growth was questioned as was the council’s approach for planning for new infrastructure. It was questioned whether the necessary infrastructure could, or would, be delivered.
4. A number of concerns were raised about maintaining the character of the district in the face of the proposed level of growth. Consultees raised landscape (including the two Areas of Outstanding Natural Beauty), the rural nature of many of our settlements, and our rich heritage (archaeology, listed buildings and conservation areas) amongst the assets as vital to protect.
5. The proposed approach to unmet housing needs from neighbouring authorities was raised in response to this policy. Some respondents questioned whether the overall strategy was appropriate for meeting Oxford’s needs (and generally this was in the context of whether to build in the Green Belt) and siting homes near jobs, while others raised questions about the Growth Board processes. It was not only Oxford’s unmet housing needs that were highlighted, some consultees mentioned that there could/would be housing needs from Reading and London that we should also be considering this in the plan.
6. The continued focus on growth in Science Vale and Didcot was generally supported, although some respondents felt that there was an over reliance on Didcot to deliver a significant amount of the housing need in the district.

7. The settlement hierarchy was generally supported, and the roles of market towns and larger villages as service centres at different scales was recognised.
8. Some respondents thought that we should add more detail to this policy about an aging population, health and wellbeing and climate change.

**Historic England** wish to see a reference to heritage assets and the historic environment in the policy.

**Oxfordshire County Council** support the proposal to meet the mid-point figure of the SHMA range (775 homes a year). They also commented that additional strategic sites may need to be included in the plan to ensure sufficient land to meet the housing targets.

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

The SHMA is evidence that complies with the required methodology and has been tested through three other Oxfordshire local authorities plan examinations (At Cherwell, Vale of White Horse and West Oxfordshire). The plans, and evidence that support them, have been found sound in two cases and in the third the SHMA and derived housing numbers were cited as a requirement.

Uncertainties such as Brexit and the Housing white paper can only be engaged with once they have been fully enacted we cannot pre-empt them in plan making.

We understand the concerns about the impacts of growth and change on infrastructure, the environment and the character of the district. The local plan must strike a balance between the need for new homes, employment, services & facilities and protecting the important facets of our district and way of life. It should be noted that the local plan is intended to be considered in its entirety, therefore specific policies that protect valuable assets and promote infrastructure provision will be part of any planning decision process.

Unmet housing need is considered in more detail under STRAT3 but it should be noted that the suggestions to consider unmet housing need for places other than the city of Oxford did not come from the relevant local authorities responsible for those areas.

**Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy to ensure it continues to reflect the objectives of the plan and it now makes reference to the historic environment.

**Policy STRAT2: The need for new Development in South Oxfordshire**

Overall 141 people commented on this policy:

- Support 14
- Comment 51
- Object 76

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

1. Some respondents suggested that this policy ought to come before the overall strategy. Arguing that it is more important to understand need before creating a strategy.
2. Others thought that this policy for South Oxfordshire's housing need ought to be combined with "STRAT3" and Oxford's unmet needs so the two numbers could be understood as a whole.
3. Similarly to STRAT1, in response to this policy several consultees questioned the SHMA, its findings and validity.
4. Many people thought the housing target was too high, and cited issues such as infrastructure capacity, the natural environment and the district's character as reasons for reducing it. Others suggested that we should only planning for the economic need figure of 750 homes per year and some suggested that more should be done to bring empty homes back into 'usable' housing stock and the council should engage with the issue of "under occupation" of homes (i.e. that some people might live in a house that was bigger than they needed).
5. In contrast to point 4 above, some respondents objected to this policy on the grounds that the housing target was too low. Many cited the figure of 825 homes per year as representing the *full* objectively assessed housing needs for the district. This figure, they argued would also delivered much needed affordable homes, and would support expected job growth in Oxfordshire. Many of these respondents also cited large amounts of available land in South Oxfordshire and some suggested that releasing land from the Green Belt could add to this availability.
6. Consultees posed questions about the council's monitoring of housing and employment land and asked what up-to-date information was available.
7. There was general support for the flexible approach demonstrated in this policy with the use of the phrase "at least" before the housing target.
8. There were some suggestions that a trajectory for housing development (and its phasing) would be useful to support this policy. Others suggested housing standards (for space and design etc.) should be included.

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

It is important that the local plan takes a reasonable and sustainable approach to understanding and delivering housing that is identified as needed. As explained under STRAT1 above, the SHMA is a methodologically robust way to identify the need for housing in our district. We have planned for an uplift from the demographic and economic needs identified in the SHMA to help boost the supply of affordable housing (and market housing that is affordable) in the district.

We have concluded that the mid-point of 775 homes per year is the most appropriate housing target for South Oxfordshire.

We will include a development trajectory as an appendix to the next version of the local plan.

**Policy/paragraph wording changes will be made as follows:**

None for this policy, but we have provided a development trajectory for detail and clarity.

### **Policy STRAT3: The unmet housing requirements from Oxford city**

Overall 426 people commented on this policy:

- Support 6
- Comment 72
- Object 348

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

1. This policy was described as unreasonable by some respondents. Many of them suggested that the council ought to be planning for the Growth Board recommended apportionment of Oxford's unmet housing needs (4950 homes). While others commented that we should not be helping at all.
2. There were comments that the policy was not flexible enough to deal with future unmet needs (let alone the 15,000 homes working assumption) and that whatever the figure South Oxfordshire plan for this should be "rolled forward" for two years in the same way as the need figure identified in STRAT2.
3. Many respondents thought that the proposed approach to meeting Oxford's unmet needs and monitoring it (i.e. counting any surplus development against the annual target from STRAT2 as meeting Oxford's needs) was too complicated and inefficient.
4. Many consultees thought that the council should identify a specific site (or sites) to meet Oxford's unmet housing needs (and most thought this ought to be adjacent to the city), however, others agreed that development should be in accordance with our spatial strategy.
5. Respondents took the opportunity to object to the inclusion of Chalgrove airfield in the plan citing as an inappropriate location to meet Oxford's needs.
6. The SHMA figures were again questioned in response to this proposed policy and we received general comments about how increasing the housing requirement would add more pressure to infrastructure, services and the districts rural character.
7. We received some support for the proposed approach to review the number when the City's local plan is adopted, and many respondents suggested that the city ought to be meeting more of their own needs within their administrative boundaries.
8. We also received comments suggesting that there could be unmet housing need from Reading, the home counties and London.

**Oxfordshire County Council** suggested that South Oxfordshire ought to be planning for 4,950 new homes to help meet Oxford City's unmet needs in line with the Growth Board statement of common ground.

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

The council is of the firm view that the approach we are taking to help Oxford meet some of their unmet housing needs is fair, reasonable and sustainable.

We will maintain the need to review this policy when the City's plan is adopted to provide flexibility to respond to changing circumstances and robustness to ensure the needs are being met.

It should be noted that no single site has been identified to meet Oxford's needs and we will maintain this position to reflect our vision for South Oxfordshire.

The approach to delivering homes above our own need as a surplus to help the city will be reviewed.

**Policy/paragraph wording changes will be made as follows:**

We have removed the second paragraph from the policy and review it to be broadly in line with the other authorities in the Growth Broad and seek delivery (and monitor) for Oxford's unmet need from 2021/22.

**Policy STRAT4: Didcot Garden Town**

Overall 307 people commented on this policy:

- Support 215
- Comment 74
- Object 16

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

1. In response to the draft policy and accompanying principles we received support for improved housing stock, employment, facilities, infrastructure and Science Vale.
2. There was also support for design principles, improving public transport and management of the natural environment. Some respondents however, warned that the principles could adversely affect development viability.
3. Many respondents wished to see a stronger recognition of the "Ladygrove Loop" local green space.
4. Some objectors suggested that there should be less development in Didcot and that the idea of a Garden Town should not be pursued.
5. Other respondents thought the principles were too vague, should heighten the importance of the historic environment and make a clear statement about individual neighbour's identities and especially those of neighbouring villages.

**Historic England** requested greater detail within the principles to highlight the importance of the historic environment in the Garden Town project.

**Oxfordshire County Council** are generally supportive of the Garden Town policy and principles, and mentioned that they are pleased to continue to be part of the delivery strategy.

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

We will review these responses alongside those submitted in response to the Garden Town delivery document. The council will continue to develop specific



planning policies for the Garden Town that have the potential to be adopted as a separate planning document.

We will ensure the Ladygrove loop is shown as an amenity local green space in future documentation.

We will review the principles to consider the historic environment. Character and design are covered in the principles and in our design policies that are supported by the design guide.

**Policy/paragraph wording changes will be made as follows:**

The principles have been amended to include heritage assets. We will also review the other principles to include a more comprehensive view on green (and blue) infrastructure and a better vision for 'active design principles' for cycling and walking.

**Policy STRAT5: Strategic allocations**

Overall 63 people commented on this policy:

- Support 9
- Comment 20
- Object 34

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

1. Most views expressed about this proposed policy were that it should have more detail and more requirements.
2. Questions were raised about the identification of infrastructure and its potential funding.
3. Respondents used the opportunity to promote sites and capacities in the district's towns and villages, and also to suggest the removal of the strategic allocation at Chalgrove airfield.
4. Some respondents suggested that the overall housing targets should be reduced to allow for greater consideration of the requirements in the proposed policy, and number also cited that this would also help to maintain a five-year supply land for new homes.

**Natural England** sought additional text to reinforce the need for biodiversity and landscape assessments and the aim to achieve a net gain in biodiversity.

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

It should be noted that the local plan policies should be read in combination and that some requirements that are not listed in this policy will be picked up through others.

Infrastructure requirements will be identified in a supporting evidence document called the Infrastructure Delivery Plan (IDP). This will also outline some potential forms of funding alongside the council's Community Infrastructure Levy (CIL) and other developer obligations through section 106 agreements.

Additional sites promoted through the local plan will be included in our Housing and Economic Land Availability Assessment (HELAA). If they have been suggested in locations where there is a Neighbourhood Development Plan in progress, the relevant parish council or local group should also be contacted.

**Policy/paragraph wording changes will be made as follows:**

We have reworded this policy to make clear what our expectation are for large scale sites. This is both, in terms of surveys and assessments but also master planning for design and layout and appropriate infrastructure.

**Policy STRAT6: Culham Science Centre**

Overall 310 people commented on this policy:

- Support 218
- Comment 19
- Object 73

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

1. There was significant support for maintaining and strengthening employment at the Science Centre and generally in Science Vale.
2. This proposed policy was cited as a good example of linking employment, to new homes, to transport and infrastructure.
3. Many respondents referred to overall growth identified in both this proposed policy and STRAT7. Some seeing the two combined opportunities as a positive and others suggesting it was a strain on infrastructure and services and threatened the character of the area.
4. Some respondents questioned the future of the Science Centre and the various projects undertaken there.
5. An inconsistency in the Green Belt inset area and developable area was also reported by several respondents.

**Historic England** noted that should development be proposed that involves the demolition of buildings on the science centre, then surveys of historic significance should be undertaken to ensure records are maintained of the value of any assets of interest concerned particularly with war time and/or post war activities on the site.

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

The support for strengthening the district employment offer is noted. The Science Centre will continue to be a key part of Science Vale and Oxfordshire's investment research and development. As and when research projects change new opportunities are likely to present themselves, and we are required to plan positively to support economic growth through our local plan.

We will maintain the note in the policy that manages the impact of any growth on the surrounding Green Belt. Whilst the site will be inset neighbouring designations are still of material weight. Impacts upon the registered park at Nuneham Courtenay will also need to be avoided.

Heritage surveys are a requirement of STRAT5 and will be expected to support proposals on this site. It is likely that there will continue to be iterative applications for development on this site so we will need to take a case by case approach should buildings be identified for demolition.

**Policy/paragraph wording changes will be made as follows:**

The error in land areas has been corrected.

**Policy STRAT7: Land adjacent Culham Science centre**

Overall 486 people commented on this policy:

- Support 221
- Comment 49
- Object 216

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

1. Support centred on the value of situating new homes near to employment. The fact that the site is adjacent to the Culham Science Centre was cited as a positive.
2. Many respondents commented that the railway station would provide an opportunity for more sustainable travel, than other strategic growth alternatives, but it was also noted that the current service was limited.
3. The delivery of supporting infrastructure was a key concern of many respondents, and the requirement to deliver the new bridge over the Thames was regularly identified as a prerequisite for development.
4. The most common objection was the principle of inseting land from the Green Belt for development. Some respondents suggested we should focus more development on 'brownfield' land and others pointed to alternative strategic options outside the Green Belt such as Chalgrove airfield and junction 7 on the M40 (also known as "Harrington")
5. There was specific concern from local people of the impact of this scale of growth on the villages of Culham and Clifton Hampden. Potential negative impacts cited, were to historic and landscape character, facilities and services that were over capacity and to an increase in vehicle traffic.

**Oxfordshire County Council** supported the principle of development adjacent to Culham Science Centre but also highlighted the need for supporting infrastructure with particular reference to a new river crossing and Clifton Hampden by-pass.

**Historic England** raised particular concerns about listed structures and known and potential below ground archaeology across the site. Noting that these would all need to be surveyed and protected and enhanced as appropriate.

**Natural England** identified that the site is adjacent to a Site of Special Scientific Interest (SSSI) and that an assessment will be needed to demonstrate that there will be no significant indirect impacts on the SSSI.

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

The council position is that the combination of housing need, significant employment and investment and the availability of public transport together with the overall strategy to support growth in Science Vale provide for the exceptional circumstances to allocate land for development adjacent to Culham Science Centre.

As with the other strategic allocations our supporting evidence identifies known strategic planning constraints and other evidence (most notably the infrastructure delivery plan) will provide us with additional information about the requirements for development. We will review the site policy in light of this evidence and add detail.

We will also continue to work with the site promoters and other stakeholders including the County Council and Network Rail to develop a scheme for development that is appropriately supported by deliverable infrastructure.

**Policy/paragraph wording changes will be made as follows:**

We have revised the policy, adding more detail about known constraints that must be surveyed and managed and also requirements that must be delivered.

**Policy STRAT8: Land at Berinsfield**

Overall 338 people commented on this policy:

- Support 223
- Comment 67
- Object 98

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

1. The principle for the regeneration project was widely supported. Respondents saw positives in energising local services, employment and housing stock. Some did, however, question the viability of the plans as drafted.
2. Comments were received questioning the scale of the proposals and whether they were necessary to facilitate the regeneration, or whether they were exaggerated for overall housing delivery.
3. As with the Culham proposal, the principle of development in the Green Belt was objected to. Respondents cited options outside the Green Belt and the potential to impact a historic approach to the city of Oxford.
4. There were local concerns about the impact of growth on the neighbouring villages. Residents of Drayton St Leonards, Burcot and Dorchester-on-Thames were concerned about coalescence (prevented as a function of the Green Belt) but also the impact of increase road traffic.

**Historic England** noted that Berinsfield is an area of particular above and below ground archaeological interest. Therefore surveys, protection and enhancement as appropriate must be part of the masterplan process.

**Oxfordshire County Council** commented that infrastructure within the masterplan area and beyond it, in terms of transport improvements, will be necessary to consider as part of the regeneration project.

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

The Council will continue to work with the local community to ensure an appropriate scheme is drawn up for the regeneration of Berinsfield. This will include, but not be limited to, a master plan and viability report.

The Core Strategy provided the exceptional circumstances for a review of the Green Belt at Berinsfield and this policy – supported by the community regeneration project – will help to quantify the scale of the review.

As with the other strategic allocations our supporting evidence identifies known strategic planning constraints and other evidence (most notably the infrastructure delivery plan) will provide us with additional information about the requirements for development. We will review the site policy in light of this evidence and add detail.

**Policy/paragraph wording changes will be made as follows:**

We have revised the policy, adding more detail about known constraints that must be surveyed and managed and also requirements that must be delivered.

**Policy STRAT9: Land at Chalgrove airfield**

Overall 602 people commented on this policy:

- Support 19
- Comment 78
- Object 505

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

1. Objectors suggested that Chalgrove airfield was an unsustainable choice for a strategic allocation. This would be exacerbated by the development acting a site to meet the unmet housing needs of Oxford City.
2. Site specific objections included:
  - a. the potential for flood risk and surface water 'run-off';
  - b. the site's use by current tenants for industrial and experimental purposes;
  - c. the site's use by the tenants and the RAF for flying;
  - d. the impact on local heritage assets (listed buildings and the battlefield);
  - e. the risk of contaminated land;
  - f. the scale of the site compared to the existing village of Chlagrove and the consequent impact on character;
  - g. the need for significant infrastructure to support the delivery of the site; and
  - h. the impact of development on existing services such as schools and GPs.

3. Supporters saw the potential development as an opportunity to create a sustainable community including significant numbers of new homes and all the necessary planned infrastructure.
4. Some cited the development of an airfield as a positive 'Brownfield' development.

**Oxfordshire County Council** commented that onsite and off-site infrastructure (including schools and roads) will be necessary to support the delivery of this site. They also noted that the site lies within an area of potential mineral deposits.

**Historic England** noted the significance of Chlagrove battlefield and welcomed the need to preserve this and its setting within the policy. They also noted that the airfield has the potential to be of historic interest and should be surveyed, protected and enhanced, or recorded as appropriate.

**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 is a reasonable location to set strategic development.

As with the other strategic allocations our supporting evidence identifies known strategic planning constraints and other evidence (most notably the infrastructure delivery plan) will provide us with additional information about the requirements for development. We will review the site policy in light of this evidence and add detail.

We will also continue to work with the site promoters, the tenants, and other stakeholders including the County Council to develop a scheme for development that is appropriately supported by deliverable infrastructure.

**Policy/paragraph wording changes will be made as follows:**

We have revised the policy, adding more detail about known constraints that must be surveyed and managed and also requirements that must be delivered.

**Policy STRAT10: Land at Wheatley campus, Oxford Brookes University**

Overall 109 people commented on this policy:

- Support 69
- Comment 23
- Object 17

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

1. There was general support for this proposed site allocation. Most support was for the redevelopment of a 'Brownfield' site, in a sustainable location with good transport links.

2. Some respondents suggested that local infrastructure would struggle to cope with more new homes, and that access to the site – especially for pedestrians – was a significant constraint.
3. There were split views as to whether the site should remain ‘washed over’ by the Green Belt and be developed as a ‘Brownfield site’ in the Green Belt or be ‘inset’ from the Green Belt for consistency with other strategic allocations and to maximise potential development on the site.
4. It was noted that the site is in Holton parish and that this should be reflected in the local plan and that the playing fields and the heritage assets on the site need to be protected and enhanced.

**Historic England** noted the presence of a scheduled monument on the site and listed buildings adjacent to it. They recommend the need for survey, protection and enhancement of these assets as appropriate.

**Oxfordshire County Council** support the development of a brownfield site and cited the need for some on and off-site infrastructure including schools and road access improvements.

**Sport England** commented that there is a need to retain the quantum of sports facilities on the site for the benefit of the new and existing community.

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

The council believes that the best way to see development delivered in an appropriate manner on this site is for it to remain washed over by the Green Belt. Redevelopment of a previously developed land is acceptable within the Green Belt.

As with the other strategic allocations our supporting evidence identifies known strategic planning constraints and other evidence (most notably the infrastructure delivery plan) will provide us with additional information about the requirements for development. We will review the site policy in light of this evidence and add detail.

We will also continue to work with the site promoters and other stakeholders including the County Council to develop a scheme for development that is appropriately supported by deliverable infrastructure.

We will ensure that the fact that the site is in Holton parish is reflected in future documentation.

#### **Policy/paragraph wording changes will be made as follows:**

We have revised the policy, adding more detail about known constraints that must be surveyed and managed and also requirements that must be delivered.

#### **Policy HEN1: The strategy for Henley**

Overall 29 people commented on this policy:

- Support 7

- Comment 12
- Object 10

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

1. Concern over increase in traffic and impact on the town
2. Need to address air quality issues
3. Henley is a sustainable location – sites should be maximised before allocating sites in AONB and Green Belt
4. Allocations should be made through the Local Plan (rather than through the neighbourhood plan)
5. Policy should be clear on number of homes required in Henley
6. Concern over impact on health services and education
7. Affordable housing should be a priority

**Oxfordshire County Council** commented that there should be aspiration to improve public transport and air quality. Some additional text should be included in the document to give some background to the strategy of improving accessibility, car parking, pedestrian and cycle links (point vii). It should be clarified whether this refers to public car parks or private parking associated with homes, how parking needs to be improved, and how this fits in with aims to reduce car use and improve air quality in Henley-on-Thames.

**Oxfordshire County Council** stated that they expect that the proposed scale of growth can be accommodated within the existing schools (primary and secondary).

**Historic England** have requested some additional wording to strengthen policy HEN1 in relation to the conservation of heritage assets

**Sport England** have commented that the strategy for Henley should include findings from the Council's Playing Pitch Strategy, and a requirement to re-provide any lost playing fields.

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

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.

We believe that local communities should direct where development is located. Therefore, except for strategic allocations at Oxford Brookes University Wheatley, Chalgrove Airfield, Berinsfield and Culham all other specific housing land allocations should be made through neighbourhood plans wherever this is possible. This is supported by national policy.

Henley has a made neighbourhood plan (Henley and Harspden Neighbourhood Plan) and this plan provides the detailed policies for the town.

Improvements to public transport are covered in policy TRANS2.

To provide clarity to local communities and neighbourhood plan groups, the next version of the local plan will include the number of homes that each settlement is expected to deliver through their neighbourhood plans. A contingency policy is



proposed in the Local Plan that gives neighbourhood plans 12 months to review their plans to bring them in line with the Local Plan in terms of housing allocations.

An Infrastructure Delivery Plan is being prepared that will inform the level of services that are required to support the development proposed in this 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 CF4 of the Plan sets out the council's position on existing sports facilities. This seeks to protect, enhance and maintain existing facilities and includes the criteria that the loss of such facilities will only be permitted where alternative facilities will be provided.

**Policy/paragraph wording changes will be made as follows:**

We have set out how many homes are expected to be delivered at each of the market towns and larger villages.

**Policy TH1: The Strategy for Thame**

Overall 36 people commented on this policy:

- Support 11
- Comment 14
- Object 11

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

1. Development at Haddenham should be considered – residents will use Thame as service hub
2. Lack of infrastructure, in particular roads, parking and GP services
3. Need contingency policy to cover scenario if the Neighbourhood Plan does not deliver development with a specified timeframe
4. The local plan should identify sites or broad locations for development
5. Need to prevent merging of outlying villages
6. Lack of reference to meeting employment needs

**Oxfordshire County Council** have commented that more information is needed to explain how parking in Thame needs to be improved as suggested in policy TH1. Public transport is also missing from the policy and should be included.

**Historic England** have requested some additional wording to strengthen policy TH1 in relation to the conservation of heritage assets.

**Sports England** have requested that an additional criteria be added to the policy to ensure that the sports pitches at Lord Williams School will be protected from development.

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

Policy CF4 of the Plan sets out the council's position on existing sports facilities. This seeks to protect, enhance and maintain existing facilities. This would apply to

the pitches at Lord William School so it is not necessary to add an additional criterion to policy TH1.

Policy TRANS2 covers sustainable transport with criteria iv) dealing specifically with public transport.

Thame has a made neighbourhood plan and this plan provides the detailed policies for the town.

Aylesbury Vale District Council is currently reviewing its Local Plan and now has a lower number of homes to plan for. This may mean that a new settlement is no longer required to meet their housing needs, including any unmet needs from neighbouring districts. Development at Haddenham is not proposed in their Local Plan. Notwithstanding this, the councils will continue to work together on cross boundary issues as part of the duty to cooperate.

The next version of the Plan will set out how many homes are expected to be delivered at each of the market towns and larger villages. A contingency policy is proposed in the Local Plan that gives neighbourhood plans 12 months to review their plans to bring them in line with the Local Plan in terms of housing allocations.

Policy EMP5 sets out our policy for employment provision in Thame, to be delivered through a review of the neighbourhood plan. The evidence to support this policy is in the Employment Land Review.

**Policy/paragraph wording changes will be made as follows:**

Additional wording will be added to the policy that support schemes that enhance the quality of the town's environment and conserve and enhance the town's heritage assets

**Policy WAL1: The Strategy for Wallingford**

Overall 27 people commented on this policy:

- Support 6
- Comment 13
- Object 8

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

1. Wallingford could support additional growth beyond that envisaged in SOLP2033, and this would support the operation of bus services
2. Housing should be delivered through SOLP2033 not through the Neighbourhood Plan
3. Land at Winterbrook, Land off Wantage Road and Site B could all deliver housing
4. Air quality is a concern and needs assessing
5. Greater emphasis should be placed on the historic environment

**Oxfordshire County Council** have stated that more information is needed to explain how parking needs to be improved. Public transport is also missing from the policy and should be included.

**Oxfordshire County Council** stated that the existing proposal to build a new school on the strategic site west of Wallingford is likely to provide sufficient

flexibility to also accommodate the suggested amount of increase in housing for the town.

**Historic England** have requested that the policy wording include reference to conserving and enhancing the town's heritage assets.

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

We believe local communities should direct where development is located. Therefore, with the exception of strategic allocations at Oxford Brookes University Wheatley, Chalgrove Airfield, Berinsfield and Culham all other specific housing land allocations should be made through neighbourhood Plans wherever this is possible. This is supported by national policy. Wallingford is currently preparing a neighbourhood plan, and this will contain the detailed non-strategic policies for the town (for example boat moorings). Policy TRANS2 covers sustainable transport with criteria iv) dealing specifically with public transport.

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.

**Policy/paragraph wording changes will be made as follows:**

Reference to the Old Waitrose site will be updated as this now has planning permission for conversion to apartments with two retail units on the ground floor.

We will review the policy to include requirement to conserving and enhancing the town's heritage assets.

## **Delivering new homes**

Overall 692 people commented on this chapter:

- Support 166
- Comment 227
- Object 299

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

Overall 55 people commented on this policy:

- Support 29
- Comment 18
- Object 8

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

1. Concerns were raised about an over reliance on Neighbourhood Development Plans, that do not require the same level of rigour as local plans. It was also raised that they are composed by volunteers and that they are not a statutory obligation therefore their completion is not guaranteed.
2. Comments were made that the policy was too restrictive, and does not allow for other sustainable locations to be considered.
3. In contrast to point two, others thought the policy was too permissive and should include more specific caveats, particularly about infrastructure requirements.
4. There was some confusion about the direction of the policy and specific numbers for towns and villages preparing NDP were requested.

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

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

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. We also need to be sure that where development is built it will be supported by appropriate infrastructure.

The housing monitoring statistics in the policy and supporting table will be reviewed.

### **Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy and added more detail for clarity. This includes a development trajectory for the plan period. We have also reviewed the housing requirements for each level of the settlement hierarchy and each settlement – these will be included in later specific policies for the towns and larger villages.

## **Policy H2 (and H2i, H2ii & H2iii): New Housing in Didcot**

Overall 21 people commented on this policy:

- Support 6
- Comment 7
- Object 8

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

1. A continued reliance on Didcot was inappropriate because of the poor delivery so far
2. More sites should be allocated in and around Didcot, including those that had been turned down on appeal.
3. The infrastructure required to support the level of growth in Didcot must be guaranteed.

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

We will review these responses alongside those submitted in response to the Garden Town delivery document. The council will continue to develop specific planning policies for the Garden Town that have the potential to be adopted as a separate planning document.

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.

We do not propose to allocate additional land in Didcot above that proposed in the second preferred options consultation.

### **Policy/paragraph wording changes will be made as follows:**

We have added some detail to the policy about the location of development.

## **Policy H3: Housing in the Market Towns**

Overall 73 people commented on this policy:

- Support 7
- Comment 20
- Object 46

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

1. There was a significant level of response seeking specific numbers for each of the towns listed.
2. Several objectors suggested that this policy demonstrated an over reliance on NDP. Some suggested that the Local Plan should make allocations as a minimum and any *additional* sites could be identified through NDP.
3. Objectors raised concerns that the numbers quoted for new homes were too high, and should take greater account of planning constraints and infrastructure capacities. And other objectors suggested the numbers were too low, arbitrarily related to existing housing stock levels. They argued that the number could be increased because there was additional land and infrastructure capacity across the towns.

4. We also received comments suggesting that the capacity calculations for the towns should focus more closely on reusing previously developed land.

**Natural England** raised concerns about the skill levels and resources available in NDP groups to survey site constraints and allocate appropriate locations for development.

**Oxfordshire County Council** raised concerns about the proposed level of growth in Henley and its impact on the transport network. They did note that the growth figures were indicative and work would continue to understand constraints. The county council also noted that detailed site specific constraints and comments would need to be considered through NDP and planning applications.

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

The council strongly advocates neighbourhood development planning and offers a range of support. We firmly believe that NDP are an appropriate way to manage development at a local level. There has been great success in the district with drafting NDP and we are confident that this will continue to support the overall spatial strategy of the local plan. The numbers for individual settlements has been considered and we have drawn up some more detailed tables that take into account commitments and completions since 2011. We have also made an assessment of the strategic planning constraints at each of the towns and identified a specific housing target for each of them to be met through their NDP.

Our 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 them meet their development aspirations.

#### **Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy and supporting text to include housing completions and commitments data and revised housing targets for each town. This review has also included an assessment of the likely capacity of each settlement to support growth and therefore how the overall development need will be distributed.

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

Overall 88 people commented on this policy:

- Support 14
- Comment 34
- Object 40

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

1. Similarly to the responses we received for H3, there was a strong sense that this policy should include specific numbers for each settlement.
2. Some respondents suggested that the numbers should better reflect planning constraints such as the AONB, Green Belt and flood risk areas. Generally, the reasoning was that this would reduce the housing target for certain settlements, but certainly a “one size” approach to growth was not supported.

3. Again, objectors saw this policy as an over reliance on NDP and suggested that allocations should be made in the Local Plan with communities given the opportunity to identify additional sites. We also received suggestions that sustainable sites that had not been allocated in NDP should also be considered through this policy.
4. The 'arbitrary' nature of the 15% growth target and linking new growth to existing scale was objected to with several respondents citing settlements that could support growth that was greater than the suggested level of growth.
5. We received a number of settlement specific infrastructure comments, suggesting that roads, schools and/or health services would not be able to cope with the increased demands that new development would bring.

**Natural England** raised concerns about the skill levels and resources available in NDP groups to survey site constraints and allocate appropriate locations for development.

**Oxfordshire County Council** noted that the growth figures were indicative and work would continue to understand constraints. The county council also noted that detailed site specific constraints and comments would need to be considered through NDP and planning applications.

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

The council strongly advocates neighbourhood development planning and offers a range of support. We firmly believe that NDP are an appropriate way to manage development at a local level. There has been great success in the district with drafting NDP and we are confident that this will continue to support the overall spatial strategy of the local plan. The numbers for individual settlements has been considered and we have drawn up some more detailed tables that take into account commitments and completions since 2011. We have also made an assessment of the strategic planning constraints at each of the larger villages and identified a specific housing target for each of them to be met through their NDP.

Our 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 them meet their development aspirations.

We have made this assessment for all the larger villages including Nettlebed where we continue to make allocations as no NDP is forthcoming. In Nettlebed we have also reviewed the number and capacity of development site allocations.

#### **Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy and supporting text to include housing completions and commitments data and revised housing targets for each larger village. This review has also included an assessment of the likely capacity of each settlement to support growth and therefore how the overall development need will be distributed.

### **Policy H5: Contingency policy for larger villages**

Overall 38 people commented on this policy:

- Support 9
- Comment 8
- Object 21

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

1. Responses to this policy focused on the need to expand it to cover all NDP not just those in 'Larger Villages.'
2. Several people suggested that this would be a difficult policy to enforce, particularly without a housing target for settlements to aim for (as could be outlined in policies H3 and H4).
3. Some respondents thought that this policy represented a threat to NDP and should be softened to allow more time or flexibility for NDP. Others, however, suggested that the need for this policy demonstrated an acceptance that NDP would not deliver against housing targets, should not be relied upon and therefore allocations ought to be made in the local plan.

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

This proposed policy is not intended to be a threat to NDP it is there as a contingency, if plans do not come forward, so planning applications can still be managed and decided upon in an appropriate way.

As mentioned above we have reviewed the policies for the towns and larger villages and have included specific number with those policies. This housing target will then relate to the contingency if NDP do not come forward.

### **Policy/paragraph wording changes will be made as follows:**

We have deleted this policy and placed the wording from it into the policies for towns and larger villages.

### **Policy H6: Land west of Priest Close, Nettlebed**

Overall 29 people commented on this policy:

- Support 3
- Comment 10
- Object 16

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

1. There was particular concern about the landscape impact of this proposed allocation especially within the AONB.
2. Some respondents questioned the scale of this development (and the cumulative impacts when combined with H7) and the potential impacts upon infrastructure and services in the local area.
3. Concerns were expressed about the green space and ecological value of the site.
4. It was pointed out that the name of the road was incorrect. It is Priest Close not *Priests*.



**Oxfordshire County Council** confirmed that there is capacity at the local primary to support development at the proposed scale.

**Natural England** noted that the site is within the Chilterns AONB and as such development would be required to meet the provisions of NPPF paragraphs 115 and 116.

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

We have reviewed the development potential of this site in light of the consultation responses and further information that we have gathered about ecology and landscape.

We note the typographical error in the name of the location and apologise for it.

**Policy/paragraph wording changes will be made as follows:**

We have reviewed the site allocation policy and amended it to reflect the latest information. We have corrected the name of the site's location.

**Policy H7: Joyce Grove, Nettlebed**

Overall 18 people commented on this policy:

- Support 2
- Comment 10
- Object 6

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

1. Respondents felt that there should be greater prominence given to the potential impact on the AONB in the policy.
2. In a similar way to H6 the scale and cumulative scale of the site was questioned when considering the local infrastructure capacities.
3. Some respondents questioned the availability of the site.

**Oxfordshire County Council** confirmed that there is capacity at the local primary to support development at the proposed scale.

**Natural England** noted that the site is within the Chilterns AONB and as such development would be required to meet the provisions of NPPF paragraphs 115 and 116.

**Historic England** noted the importance of preserving and enhancing the listed building and its setting, and also requested that the potential above and below ground archaeology is surveyed, preserved and/or recorded as appropriate.

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

The council's evidence indicates that the site is available and we continue to support the owners in exploring opportunities for relocation. This development site, like any other, requires a planning application that would need to be considered against all the relevant policies of the local plan, so details that are contained in other policies will still be considered.

**Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy and included reference to the AONB.

**Policy H8: Land east of Benson Lane, Crowmarsh Gifford**

Overall 44 people commented on this policy:

- Support 5
- Comment 8
- Object 31

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

1. Objection focused on the proposed scale of this allocation and that it was inappropriate compared to the size of the existing village and its services and infrastructure.
2. Concern was raised about the impact on the landscape (especially the AONB), on wildlife habitats and the loss of agricultural land.
3. Several people pointed out that the site was refused at planning committee.
4. It was also pointed out that the site is *outside* the AONB, and that this is especially relevant when compared to alternatives, and that the site could support the delivery of a sustainable extension to the village.

**Oxfordshire County Council** commented that the cumulative scale of growth is likely to require an extension to the primary school.

**Historic England** requested that the local listed buildings and their setting are preserved as part of any scheme, and that potential above and below ground archaeology is surveyed, preserved and/or recorded as appropriate.

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

Crowmarsh Gifford parish council applied for NDP area designation, and this was granted, in May 2017. We have therefore transferred the responsibility of allocating local scale sites at the village to the parish council and their NDP steering group.

**Policy/paragraph wording changes will be made as follows:**

We have deleted the policy and it will be replaced by allocations in the NDP.

**Policy H9: Land to the South of Newnham Manor, Crowmarsh Gifford**

Overall 19 people commented on this policy:

- Support 4
- Comment 8
- Object 7

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

1. Respondents commented that the site was in the AONB and could be considered to be major development therefore it might need to be demonstrated that there were very special circumstances for its development.

2. Concern was raised about the scaled of this site and the ability of the local infrastructure and services to cope.
3. The road network was also raised as a concern and some questioned whether safe access could be achieved.
4. The potential to improve the school facilities was supported as was the opportunity to develop the brownfield elements of the site

**Oxfordshire County Council** commented that the cumulative scale of growth is likely to require an extension to the primary school.

**Historic England** requested specific screening to Newnham Manor as part of any scheme.

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

Crowmarsh Gifford parish council applied for NDP area designation, and this was granted, in May 2017. We have therefore transferred the responsibility of allocating local scale sites at the village to the parish council and their NDP steering group.

**Policy/paragraph wording changes will be made as follows:**

We have deleted the policy and it will be replaced by allocations in the NDP.

**Policy H10: Housing in Smaller Villages**

Overall 86 people commented on this policy:

- Support 16
- Comment 39
- Object 31

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

1. Many respondents found this policy confusing and/or ambiguous in its intent.
2. Respondents questioned the deliverability of the proposed houses, citing constraints such as AONB, Green Belt and the potential erosion of the character of smaller villages. Others raised concerns about the certainty of delivery with or without specific site allocations, and suggested the numbers were arbitrary.
3. Several respondents suggested that the policy was too restrictive and should not be limited to infill and sites of less than 10 homes.
4. Some respondents asked how affordable housing would be delivered if development was restricted in the smaller villages to sites of less than 10 given changes to government guidance on scale.

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

The council is committed to helping all scale of communities develop NDP should they wish to and the proposed policy will help that. We also recognise that some communities would like small amounts of growth but do not have the resources to

produce a plan. This proposed policy allows for a balance to be met in each situation.

The proposed policy wording was confusing and we have investigated ways of making clearer and more robust.

**Policy/paragraph wording changes will be made as follows:**

We have revised the policy wording to make it clearer what our expectations are in smaller villages with NDP and those without.

**Policy H11: Affordable Housing**

Overall 60 people commented on this policy:

- Support 20
- Comment 25
- Object 15

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

1. Support was received for the principle of delivering affordable housing and a number of respondents cited the rising prices of homes in Oxfordshire.
2. Several people questioned how enforceable the policy was and complained that the current 40% policy is not met on all sites that are permitted.
3. It was questioned how this policy would balance with the need for affordable housing coming from Oxford city and the unmet housing need that SODC are planning for.
4. Changes were suggested that would introduce a minimum requirement, or that affordable home remain affordable in perpetuity, and also that there should be restrictions placed on the ability to extend such properties.
5. Other suggestions were that more viability testing ought to be undertaken to test the policy and that it should be made more flexible to allow for greater delivery.

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

There is national guidance about what local authorities can and cannot require in affordable housing policy. We have followed this to create what we believe to be a reasonable approach to managing the delivery of affordable homes. It is necessary for the process to involve negotiations as the delivering of affordable homes is directly linked to viability and planning obligations, therefore we cannot change this element of the policy.

We have undertaken viability testing and will also be reviewing our planning obligations and CIL strategies soon. This information will be published online.

**Policy/paragraph wording changes will be made as follows:**

We have made no significant changes to this policy.

**Policy H12: Exception sites**

Overall 16 people commented on this policy:

- Support 9

- Comment 4
- Object 3

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

1. Exception sites received support from respondents wishing to see more affordable homes in the district for local people.
2. Concerns were raised about the impact of exception sites – at the edge of settlements – on landscape and character
3. A suggestion was made to change the 'or' between the criteria to an 'and' to ensure a robust policy.

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

The council is keen to support communities wishing to identify exception sites. We will also pursue their delivery in locations where we identify a need.

This type of development would be subject to the same planning assessment as any other when considering planning constraints such as landscape, flood risk and design etc. therefore this detail would be covered by other policies.

### **Policy/paragraph wording changes will be made as follows:**

We have not made any significant changes to the policy, but we have removed 'or' from between the criteria.

### **Policy H13: Meeting housing needs**

Overall 30 people commented on this policy:

- Support 9
- Comment 10
- Object 11

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

1. It was suggested that the council should be expecting more in terms of housing mix, size and adaptability. Respondents requested that the council be more creative in its policy.
2. Objectors suggested that this policy was too prescriptive and should be a guide rather than a requirement.
3. More viability evidence was requested.
4. Greater detail about the mix of dwelling sizes was also requested.

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

One of the council's key objectives is to provide houses that meet the needs of the community. The housing strategy evidence indicates that there is justification for seeking to use the nationally described housing standard and for seeking some specially adapted homes as well.

We are aware that these requirements need to be balanced against the viability of deliverability and will publish viability assessments on line.

### **Policy/paragraph wording changes will be made as follows:**

We have revised the policy and its supporting text to provide greater detail and clarity including guidance for market housing mix.

#### **Policy H14: Self-build and custom-build housing**

Overall 16 people commented on this policy:

- Support 8
- Comment 5
- Object 3

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

1. The principle of custom and self-build was generally supported.
2. Some respondents suggested that the council ought to do more to support this form of development – advertise the register more and be more supportive in policy terms, identify more sites and provide specific design guidance.
3. There was some support for a higher percentage to be included in the policy.
4. Objectors questioned the credibility of this mechanism for delivering affordable homes.

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

We need to balance this form of delivery with others that are available. Our evidence shows a relatively modest need for self and custom build homes. We will continue to monitor this need and support NDP groups to identify appropriate sites and support them in other ways through the planning application process in appropriate locations.

#### **Policy/paragraph wording changes will be made as follows:**

No significant changes have been made to this policy.

#### **Policy H15: Specialist Housing for Older People**

Overall 21 people commented on this policy:

- Support 8
- Comment 7
- Object 6

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

1. The principle for providing homes for older people was generally supported
2. The level of available evidence, particularly at neighbourhood level, was questioned.
3. Objectors suggested that more detail should be provided about scale and sites for the provision of this type of housing.

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

Our housing evidence, and the demographics for South Oxfordshire, show an increasing need for homes for older people. We will continue to work with the

county council and with NDP groups to identify localised needs and appropriate sites for appropriate homes for older people.

**Policy/paragraph wording changes will be made as follows:**

None.

**Policy H16: Provision for Gypsies, Travellers and Travelling Showpeople**

Overall 18 people commented on this policy:

- Support 6
- Comment 3
- Object 9

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

1. This policy has been included in the Plan without prior notice and without consultation with the NDP group
2. Chalgrove airfield does not meet the criteria of the policy
3. How has the need been identified?
4. Sites should be identified through neighbourhood plans
5. There should be a policy on park homes
6. There was both support for and objection to sites in Kiln lane Garsington.
7. There was support for the position of not allowing pitches and plots in the green belt, although there was also concern raised with a blanket ban on homes in the green belt and that this was inappropriate when compared to housing for the settled community.

**Historic England** have requested that an additional criterion be added to policy H16 regarding the conservation of heritage assets.

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

National policy set out in Planning Policy for Traveller Sites (2015) states that pitches/plots in the green belt are deemed as inappropriate development. The council's approach is in line with this national policy.

The number of pitches that we are required to plan for is evidenced through a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA). Our GTAA was updated in 2017 to consider the latest national guidance and this has reduced the number of pitches that we need to plan for to 10.

**Policy/paragraph wording changes will be made as follows:**

Policy H16 will be amended to take account of the number of pitches now needed. This reduces the number of pitches needed at each site to: 4 at Didcot North East, 3 at Culham and 3 at Chalgrove.

**Policy H17: Safeguarding Traveller Sites**

Overall 8 people commented on this policy:

- Support 5
- Comment 2

- Object 1

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

1. Policy should be clear it only applies to authorised sites
2. Policy should be clear it only applies to permanent sites, not temporary sites

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

We agree that the policy should be clear on the sites that it applies too.

### **Policy/paragraph wording changes will be made as follows:**

Policy H17 will be amended to make it clear that only authorised and permanent sites will be safeguarded.

### **Policy H18: Infill Development**

Overall 17 people commented on this policy:

- Support 6
- Comment 4
- Object 7

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

1. Some respondents suggested the policy was too prescriptive
2. Others suggested it should include more requirements about access, design and amenity
3. More detail and guidance about acceptable infill was also requested.

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

This proposed policy should be read in combination with others in the local plan that guide design, access and amenity. It is noted that greater detail would help guide reasonable and appropriate infill.

### **Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy and supporting text to improve clarity and guidance, particularly, about where infill development will be most appropriate with reference to the settlement hierarchy.

### **Policy H19: Sub-division and conversion to multiple occupation**

Overall 5 people commented on this policy:

- Support 4
- Comment
- Object 1

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

1. General support was received for this policy to help increase the housing stock and to provide smaller homes that are potentially more affordable.



**Historic England** requested that 'historical' is added to public, environmental or ecological value in the policy

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

Comments were noted in response to this policy, and it will remain part of the overall local plan to guide specific type of planning applications.

**Policy/paragraph wording changes will be made as follows:**

We have revised the wording as per Historic England's comments.

**Policy H20: Replacement dwellings**

Overall 14 people commented on this policy:

- Support 6
- Comment 3
- Object 5

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

1. Respondents suggested that the policy should include more detail about issues such as design, access and amenity.
2. It was questioned why the policy only related to development outside of settlements
3. The citation about original size definition was also challenged.

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

This proposed policy should be read in combination with others in the local plan that guide design, access and amenity.

The council is content that the description of what constitutes the original volume of a structure is reasonable and it has been retained in the policy.

**Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy for its policy and not made and significant changes.

**Policy H21: Extensions to dwellings**

Overall 11 people commented on this policy:

- Support 6
- Comment 2
- Object 3

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

1. Respondents suggested that the policy should include more detail about issues such as design, access and amenity.
2. The citation about original size definition was also challenged.

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

This proposed policy should be read in combination with others in the local plan that guide design, access and amenity.

The council is content that the description of what constitutes the original volume of a structure is reasonable and it has been retained in the policy.

**Policy/paragraph wording changes will be made as follows:**

We have reviewed the policy for its policy and not made and significant changes.

**Policy H22: Loss of Existing Residential accommodation in Town centres**

Overall 5 people commented on this policy:

- Support 5
- Comment 0
- Object 0

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

1. There was general support for this policy

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

The support for this policy is noted

**Policy/paragraph wording changes will be made as follows:**

None

## Employment

### Overall Chapter

Overall 158 people commented on this chapter:

- Support 37
- Comment 58
- Object 63

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

Overall 32 people commented on this policy:

- 7 Support
- 13 Comment
- 12 Object

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

1. Chalgrove too isolated for employment
2. Support Culham as this links to the Strategic Economic Plan (2014)
3. Too much/little employment land is being provided
4. The plan is not clear on how it is meeting current needs and demands
5. The plan doesn't seem to consider losses of employment land and therefore not enough jobs will be provided for the housing proposed
6. Thame needs more/less employment land
7. Is the 5ha at Chalgrove in addition to Martin Baker Ltd?

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

The council will continue to monitor the provision of employment land in line with the economic forecasts made in the Oxfordshire Strategic Housing Market Assessment. The council will seek to plan for the employment needs of the district. Planning applications received for employment uses will be considered against the relevant local and national policies.

### Policy/paragraph wording changes will be made as follows:

Delete para 6.19

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

Overall 4 people commented on this policy:

- 3 Support
- 1 Comment
- 0 Object

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

1. General support

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

There is general support for this policy

**Policy/paragraph wording changes will be made as follows:**

No changes

**Policy EMP3: Retention of Employment Land**

Overall 20 people commented on this policy:

- 5 Support
- 8 Comment
- 7 Object

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

1. Need a stronger policy
2. Allocate more employment land
3. Should the criteria be “and” or “or”?
4. At odds with the NPPF
5. If unsuitable employment land is lost, new suitable sites should be added/mechanism to review

OxLEP support

**The council’s summary response to the main themes**

There is general support for the policy. The NPPF is clear that the planning system should contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. Whilst the NPPF advises that planning policies should avoid the long-term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose, there is a high prospect of the allocated sites being developed within the plan period. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. The plan seeks to support the existing business sectors. The council is aware that house prices and residential land values are high in the district and this places employment sites under pressure to be developed for residential uses. Without protection of employment land, sites and uses, these pressures could lead to such sites being developed for residential uses, resulting in a loss of employment opportunities for local people and this would not represent sustainable development.

The council continues to monitor employment land and the effectiveness of planning policies. A review of these policies would be undertaken if required or additional sites allocated. Planning applications for employment land will be considered on their merits against local and national planning policies.

**Policy/paragraph wording changes will be made as follows:**

We will review the policy wording and amend as necessary for clarity and robustness.

Add the follow wording after the last paragraph:

Schemes that improve the stock of existing commercial buildings and the environment of existing employment areas will be supported.

#### **Policy EMP4: Employment Land in Didcot**

Overall 6 people commented on this policy:

- 2 Support
- 2 Comment
- 2 Object

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

1. Employment should be only for local people and not large distribution centres
2. Require solar panels on the roofs of new development
3. Will employment land displaced from the Garden Town Developments such as at Rich's Sidings be relocated and will SODC assist?

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

Comments advised that new employment should only be for local people. The council is unable to specify who works on employment sites and cannot restrict employment to local people only. The council however is seeking to provide enough employment land to meet the forecast economic growth identified in the Oxfordshire SHMA. Draft policy EMP2 seeks to ensure a range, size and mix of employment premises to meet a variety of demands whilst EMP3 seeks to protect existing employment sites from development pressures to achieve sustainable development.

The council would support solar panels on the roofs of new development providing the design is appropriate, however the council must conform to current legislation.

#### **Policy/paragraph wording changes will be made as follows:**

None

#### **Policy EMP5: New Employment Land at Henley**

Overall 2 people commented on this policy:

- 1 Support
- 0 Comment
- 1 Object

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

1. The phrase, "Schemes that improve the stock of existing commercial buildings and the environment of existing employment areas will be supported" should be in EMP3 rather than EMP5.

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

This text will be moved to policy EMP3.

#### **Policy/paragraph wording changes will be made as follows:**

Add the above text to EMP3.

## **Policy EMP6: New Employment Land at Thame**

Overall 8 people commented on this policy:

- 1 Support
- 2 Comment
- 5 Object

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

1. Support for Neighbourhood Development Plans
2. Need to allocate addition of employment land at Thame as it is a sustainable location (a minimum of 7 hectares)
3. No need to allocate additional employment land at Thame due to past take up.
4. Council should plan proactively to meet the development needs of business and should reassess the existing stock of employment land and need throughout the district. It is unclear if changes in employment land at Thame have been monitored.
5. There is a shortage of office space in Thame
6. The boundary of the Thame NDP area is constrained to the west of the town. Relies on the Great Haseley parish area. This is limiting and undermining sustainable development.

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

The council is seeking to provide enough employment land to meet the forecast economic growth identified in the Oxfordshire SHMA. The Thame NDP would be able to allocate additional employment land if the NDP group felt that this was appropriate.

The council continues to monitor employment land and the effectiveness of planning policies. A review of these policies would be undertaken if required or additional sites allocated. Planning applications for employment land will be considered on their merits against local and national planning policies.

The NDP boundary follows that of the parish and that of the district. The boundary also follows the river Thame. South Oxfordshire will continue to exercise its Duty to Cooperate with our adjoining districts. It should also be noted that land to the north-west of Thame between the river and the A418 is located within flood zone 3. To the west of Thame, the parish shares its boundary with Great Haseley Parish Council who are not currently preparing a NDP. In areas where no NDP is being made the council will allocate sites.

The Thame Neighbourhood Plan allocates 3Ha of employment land to the east of the town. This allocation consists of 2ha to meet the Core Strategy requirement and an additional 1ha to compensate for the loss of employment land at the former Memec site, which the neighbourhood plan allocates for residential use.

The 2015 Employment Land Review identifies 1.6ha of undeveloped land at Thame Industrial Cluster at land south-east of Howland Road Business Park. This

1.6ha is in addition to the Thame NDP allocation of 3ha. The 2015 ELR recommends this site in policy R3 as a potential development site.

**Policy/paragraph wording changes will be made as follows:**

None

**Policy EMP7: New Employment Land at Wallingford**

Overall 14 people commented on this policy:

- 1 Support
- 8 Comment
- 5 Object

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

1. Additional infrastructure required with these allocations
2. The whole of Hithercroft Industrial Estate should be safeguarded for employment use
3. Care homes should not be considered as an employment use
4. Concern that the Wallingford NDP will be made within the time period
5. Allocated sites have not been previously allocated. Allocation should be left to the NDP.

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

Additional infrastructure is being planned for in the district wide Infrastructure Delivery Plan. The Wallingford NDP can also plan for additional infrastructure. The council has an existing policy and an emerging policy for the retention of existing employment land and therefore the Hithercroft Industrial Estate site does not need to be allocated.

The draft policy advises that the Wallingford NDP must be submitted to the Council within 12 months of adoption of this local plan. If the NDP is not adequately progressed in this time the local planning authority will allocate site(s) through a review of the local plan.

The sites to be allocated in the emerging local plan are currently allocated for employment use as per saved policy WAL5. Parts of the allocation of WAL5 have been developed whilst the sites that have potential for employment development have been carried forward. These sites are identified in the 2015 Employment Land Review.

Planning permission has been granted for new employment development on land adjoining Lester Way. This will give an additional 3.1ha of employment land.

**Policy/paragraph wording changes will be made as follows:**

Delete the last paragraph as it will be added to EMP3

**Policy EMP8: New Employment Land at Crowmarsh Gifford**

Overall 4 people commented on this policy:

- 2 Support

- 1 Comment
- 1 Object

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

1. Good place for new businesses

**Historic England** noted the potential impact on the setting of a grade 2 listed building.

**Defence Infrastructure Safeguarding** requested to be consulted on any development exceeding 10.7m in height for the northern site and 45.7m in height on the southern site.

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

Crowmarsh Gifford are now preparing a NDP. Therefore, it will be the responsibility of the NDP group to allocate sites. The council expects to amend the policy to reflect policy EMP6 at Thame or EM10 at Chalgrove. The 2015 Employment Land Review identifies that there are two undeveloped plots of land at Howberry Park in Crowmarsh Gifford measuring 1.9 hectares and 0.6 hectares.

### **Policy/paragraph wording changes will be made as follows:**

Change EMP8 as follows:

*At least 2.5 hectares of employment land will be delivered at Crowmarsh Gifford. These will be delivered through the Neighbourhood Development Plan.*

*The Neighbourhood Development Plan must be submitted to the Council within 12 months of adoption of this local plan. If the Neighbourhood Development Plan is not adequately progressed in this time the local planning authority will allocate site(s) through a review of the local plan.*

*This policy contributes towards achieving objectives 1, 2, 3 & 6.*

### **Policy EMP9: Employment at Culham Science centre**

Overall 13 people commented on this policy:

- 3 Support
- 10 Comment
- 0 Object

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

1. Support but infrastructure required for any new development.
2. The Culham River Crossing is required before additional development on this site
3. Insetting Culham Science Centre from the Green Belt means that more than 1,000 additional jobs could be provided on the site.

**Defence Infrastructure Safeguarding** would need to be consulted on any development exceeding 91.4m in height.



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

Additional infrastructure is being planned for in the district wide Infrastructure Delivery Plan. The policy. The policy advises that "about" 1,000 jobs will be supported and this is not a cap on development on this site.

### **Policy/paragraph wording changes will be made as follows:**

None

### **Policy EMP10: New Employment Land at Chalgrove**

Overall 17 people commented on this policy:

- 3 Support
- 3 Comment
- 11 Object

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

1. Monument Business Park is at capacity and the site owner does not wish to expand by more than 400 jobs. The site is isolated and does not have the necessary infrastructure to support the development proposed.
2. There is no justification to support additional employment land in this location

**Defence Infrastructure Safeguarding** would need to be consulted on any development exceeding 15.2m in height.

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

Planning permission has been granted for the expansion of the site at Monument Business Park, to provide 2.25ha of B1a and 0.2ha of B8 employment land. There is an additional 2.5 ha of land between this site and the existing employment land.

### **Policy/paragraph wording changes will be made as follows:**

None

### **Policy EMP11: Development in the countryside and Rural areas**

Overall 21 people commented on this policy:

- 4 Support
- 6 Comment
- 11 Object

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

1. Development should be proportional to the existing development and existing facilities
2. There is no mention of agriculture or rural industries in the policy
3. The policy is too permissive and should state that development will only be permitted where it doesn't conflict with other policies of the plan and respect the character of the countryside
4. Need clarity on sports venues
5. Need to retain existing local plan 2011 policies in relation to farm diversification, farm shops, sports, tourism, equestrian.

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

The NPPF criteria for supporting economic growth in rural areas is included in policy EMP11. This policy is supportive of the development and diversification of agricultural and other land-based rural businesses. The policy should be read with other policies in the local plan, NDPs and the NPPF which contain policies on design, access and amenities.

### **Policy/paragraph wording changes will be made as follows:**

None

### **Policy EMP12: Tourism**

Overall 4 people commented on this policy:

- 2 Support
- 0 Comment
- 2 Object

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

1. Inclusion to reference to Equestrian Developments is needed in the Plan, as the Vale of White Horse has done.

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

The council believe that this is an important policy to retain within the local plan to manage specific types of planning application. There was not a significant response to the consultation but we have reviewed the policy.

### **Policy/paragraph wording changes will be made as follows:**

The policy has been revised to support appropriate tourism and visitor accommodation development in suitable and sustainable locations. The revised policy seeks to support farm diversification and equine related development provided it is in accordance with the relevant policies of the plan including relevant policies relating to transport, sustainable development and protecting our landscape and the amenity of visitors, residents and businesses.

### **Policy EMP13: Caravan and camping sites**

Overall 4 people commented on this policy:

- 2 Support
- 2 Comment
- 0 Object

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

1. Policy should be subject to credible evidence of economic viability for new developments to prevent artificial efforts to subsequently show lack of viability linked to demands for change of use.
2. Enhance wording for equalities

**Historic England** welcome the reference to historic characteristics

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

The issue of the possibility of applicants attempting to use the policy as a staged process for alternative development was raised in the representations, however any application for a caravan and camping site would be considered on its merits and any proposals for a change of use of an existing caravan and camping site would be considered against adopted local and national policy.

**Policy/paragraph wording changes will be made as follows:**

No significant changes will be made as a result of the consultation.

**Policy EMP14: Visitor accommodation**

Overall 9 people commented on this policy:

- 1 Support
- 2 Comment
- 6 Object

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

1. New visitor accommodation should only be provided in locations where new homes are likely to be appropriate
2. Policy should be subject to credible evidence of economic viability for new developments to prevent artificial efforts to subsequently show lack of viability linked to demands for change of use.

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

The council is keen to support tourist accommodation in appropriate locations to support this important part of the local economy. The proposed policy would benefit from revision for clarity and robustness.

**Policy/paragraph wording changes will be made as follows:**

The policy has been revised to support appropriate tourism and visitor accommodation development in suitable and sustainable locations. The revised policy seeks to support farm diversification and equine related development provided it is in accordance with the relevant policies of the plan including relevant policies relating to transport, sustainable development and protecting our landscape and the amenity of visitors, residents and businesses.

## Infrastructure

Overall 552 people commented on this chapter:

- Support 148
- Comment 202
- Object 202

### **Policy INF1: Infrastructure provision**

Overall 75 people commented on this policy:

- Support 16
- Comment 48
- Object 11

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

1. Infrastructure needs to be in place before housing
2. Chalgrove airfield has insufficient infrastructure, Culham and Berinsfield have existing infrastructure
3. Concern over the impact of development on minor roads and existing local services
4. Lack of consideration of issues such as schools and GP services
5. Concern over the deliverability of infrastructure due to i) high cost ii) not within remit of SOCD

**Clinical Commission Group (CCG)** – commented that developer contributions will be needed to fund new GP practices and extend existing practices.

**Network Rail** – have requested an additional policy in the Plan stating that developer contributions towards rail infrastructure will be required from significant housing developments near existing rail infrastructure

**Thames Water** – support the policy

**Education & Skills Funding Agency (ESFA)** – support the policy and request the land is safeguarded for provision of new schools and to expand existing schools

**Oxfordshire County Council** – commented that SOCD should ensure that new strategic sites pay for their infrastructure needs and consider exempting strategic sites from CIL and instead require specific infrastructure to be funded  
There will be pressure on waste and recycling facilities. These facilities are due to be reviewed in 2018/19  
The policy should make reference that the Oxfordshire Infrastructure Strategy Infrastructure funding will be subject to the regulatory tests and CIL requirements.

**Scottish and Southern Energy (SSE)** – commented that contractual arrangements with SSE should be provided for any modifications before permission is granted.

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

An Infrastructure Delivery Plan (IDP) is being prepared which looks at existing infrastructure provision and identifies new infrastructure needed to support new development. The IDP is an important element of the evidence for the Local Plan and will help inform and underpin strategic policies for growth and development. The policy as worded does not preclude contributions towards rail infrastructure should this be required as result of development and meet the regulatory and CIL tests.

Where possible infrastructure will be phased in line with 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. We will continue to work with stakeholders and external providers to achieve this.

In addition to the IDP, the Evaluation of Transport Impacts and Sustainable Transport Study will give more evidence for priorities for transport mitigation, which will input into the IDP.

Mitigation will come forward that is relevant and related to the proposed development (as per CIL tests), depending on funding available from both development and match funding from government/other sources. The identification of safeguarded land across the District provides the opportunity for transport mitigation to take place if this is required in direct relation to development. The routes have been identified through working with Oxfordshire County Council and would provide improved, less congested access for transport.

### **Policy/paragraph wording changes will be made as follows:**

Reference will be made to the Oxfordshire Infrastructure Strategy  
Reference will be made to infrastructure funding being subject to the regulatory tests and CIL requirements.

### **Policy INF2: Electronic communications**

Overall 7 people commented on this policy:

- Support 5
- Comment 1
- Object 1

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

1. There was general support for this policy
2. Superfast broadband needs defining as it is measured differently by the government and Ofcom
3. There was some doubt that this policy could be delivered
4. The issue of phone coverage was raised
5. There was suggested change to the wording of the policy regarding the installation of infrastructure to enable fibres to be laid in the development

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

We will consider specifying a minimum standard for superfast broadband.

Phone coverage is addressed in policy INF3.

We will consider changing the wording of the policy to strengthen the policy and ensure developments are served by good connections.

**Policy/paragraph wording changes will be made as follows:**

We will consider strengthening this policy by defining superfast and specifying what is required in new developments in terms of infrastructure

**Policy INF3: Telecommunications Technology**

Overall 7 people commented on this policy:

- Support 6
- Comment 1
- Object

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

1. There was general support for this policy
2. The policy doesn't mention mast sharing

**Historic England** commented that they supported the reference to heritage considerations in this policy.

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

Support noted. Criteria iii) addresses mast sharing.

**Policy/paragraph wording changes will be made as follows:**

No changes required.

**Policy INF4: Safeguarding of land for a reservoir**

Overall 18 people commented on this policy:

- Support 8
- Comment 2
- Object 8

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

1. There is no mention of the AONB or Public Rights of Way
2. There was general support for this policy
3. There was support for including reference to biodiversity
4. The policy is not needed as Chinnor has been screened out as an option for a reservoir by Thames Water

**Thames Water** confirmed that the Chinnor reservoir site is no longer a preferred option to be included in the draft Water Management Plan 19. Therefore, the Chinnor reservoir site no longer needs to be safeguarded in the Local Plan and Policy INF4 and supporting text can be deleted.

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

The council note that this policy is no longer needed.

**Policy/paragraph wording changes will be made as follows:**

Delete policy

**Policy INF5: Water Resources**

Overall 13 people commented on this policy:

- Support 7
- Comment 4
- Object 2

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

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

1. General support for policy given by most respondents as long as it is implemented
2. Some concern about impact of strategic sites (Chalgrove and Culham) on water supply, as well as flooding and sewage capacity

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

Strategic sites will need to show how adequate water and sewage capacity is provided as part of their planning applications, and in line with INF1 and STRAT 5.

**Policy/paragraph wording changes will be made as follows:**

No significant changes to the policy as a result of the consultation.

**Policy TRANS1: Supporting Strategic Transport Investment**

Overall 122 people commented on this policy:

- Support 21
- Comment 49
- Object 52

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

1. There is a need to ensure wider impacts understood- e.g. between Oxon & Bucks and on the A34- southbound and northbound
2. General concerns about impacts of the proposed Ox- Cambridge Expressway in terms of impacts, but also that the implications for planning of development should be better understood
3. General concern about impacts of the proposed Third Thames Crossing on South Oxfordshire including AONB and need for appropriate mitigation in relation to traffic impacts
4. General point that development should better support public transport improvements
5. Local concerns about getting mitigation as and before development comes forward, with some support for the initial package of infrastructure identified

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

- The Council is continuing to work with surrounding authorities on relevant cross-border matters, including on traffic modelling impacts in South Oxon from the proposed Thames Crossing with Wokingham and Reading, and to the east with Bucks on impacts of combined development
- The ETI and Sustainable Transport Study will give more evidence for priorities for transport mitigation, which will input to the IDP
- Mitigation will come forward that is relevant and related to the proposed development (as per CIL tests), depending on funding available from both development and match from government/ other sources
- The Council is working with others to better understand the impacts and benefits of any expressway options

**Policy/paragraph wording changes will be made as follows:**

- Replace text 'Need to say more about expressway in text (following Cabinet briefings in August)' with, further references to the potential Oxford to Cambridge expressway will be provided in the Plan
- Replace text of 'May need to be clearer that we expect mitigation in South Oxfordshire if the 3<sup>rd</sup> Thames Crossing at Reading comes forward? (suggestion by resident that wording is changed to "Plan for improvements in the Reading area, including any proposal for a new River Thames crossing provided that such proposal delivers both demonstrable benefits for South Oxfordshire and which ensures that no community in South Oxfordshire suffers from adverse traffic and environmental impacts as a result.")' with, 'Further supporting text will be added to the plan to note where we are in terms of development of the crossing proposals and understanding potential impacts on South Oxfordshire.
- Replace text of, 'Should we specifically reference DfT circular, 02/2013- 'The Strategic road network and the delivery of sustainable development.' with, 'Reference to the Strategic Road Network and Delivery of Sustainable Development (DfT Circular 02/2013) will be given under policy TRANS 4.'

**Policy TRANS2: Promoting Sustainable Transport and accessibility**

Overall 51 people commented on this policy:

- Support 17
- Comment 20
- Object 14

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

1. Concern in general about parking, including enforcement of parking at Wallingford and policy for provision of parking in towns and villages
2. Concern about LTP 4 P&R strategy and locations of sites in Green Belt
3. Some general support for policy, but concern that location of certain sites- e.g. Chalgrove don't fit with policy
4. More information on links to Air Quality, control of emissions is needed
5. Need to continue to work with others on managing relevant cross border impacts of growth- e.g. Bucks

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



- Plans for parking need to be developed in partnership with the County Council as for example, they would have any powers to control on-street parking
- Sustainable transport study is looking at how new growth areas can best link to sustainable transport networks
- Need to consider stronger references and linkages to Air Quality matters and transport
- Will continue to work in partnership on cross border matters

**Policy/paragraph wording changes will be made as follows:**

We have revised the proposed policy to positively encourage locating development close to existing and planned transport investment corridors, included investment in rail capacity for freight, Rapid Transit and Park & Ride and to refer to improving public transport links.

We have also reviewed the approach to the provision and management of car parking aimed at improving the attraction of our town and village centres and clarified the text in particular in with reference to Air Quality Management Areas where car parking management techniques can encourage people to not drive through effected areas.

**Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes**

Overall 171 people commented on this policy:

- Support 36
- Comment 42
- Object 93

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

1. Mix of support and objection to safeguarded schemes
2. Concern about impact that safeguarded schemes will have on surrounding areas
3. Suggestions for additional safeguarded schemes (bypass for Little Milton, Wallingford northern bypass, Park & Ride at Lewknor, improvements at junction of the M40)
4. Concern that Watlington, Chalgrove and Goring are not included in the fully modelled area of the transport model
5. Alternative routes suggested for a number of safeguarded schemes

**Oxfordshire County Council** comment that:

- With regard to NPR3, it is essential that the proposed access to the development site does not prejudice the delivery of the NPR3 junction onto Hadden Hill. Detailed design is ongoing and there may be changes to the safeguarded area.
- Parcels of land proposed to be safeguarded for the Culham crossing and Benson bypass are within mineral safeguarding area - this should be considered.
- Flagging concern about funding for bypasses of villages which are receiving relatively little development.

- Safeguarding needs to be wide enough to enable new routes to effectively provide for future traffic by diverting relevant A or B road.
- Safeguarding for Southern Didcot spine road – will continue to work with district on whether the road is required.
- Does the Culham allocation include the Rail Station and railway line?  
Further work is needed on whether necessary to specifically safeguard land to facilitate rail upgrade.

**Historic England** have concerns that about the impact of an Abingdon southern bypass and Culham to Didcot crossing on scheduled monuments. Either of the routes for the Culham to Didcot crossing would cause serious concern.

**Sport England** are concerned that part of safeguarded area for NPR3 runs through Hadden Hill Golf Club and would like land to be safeguarded to replace the area lost from the golf course.

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

The routes for safeguarding have been identified through working with Oxfordshire County Council as highway authority. We will continue to work with the county council to consider the most suitable extent of safeguarding and impact on surrounding areas.

The schemes to be included for safeguarding are informed by the latest transport evidence available, including the schemes proposed within the latest County Council Local Transport Plan

The ETI Stage 1: Network and Model Performance report published on our website gives further details on suitability of the model for testing the impacts of the proposed strategic planned development

The IDP will provide more detail on proposed schemes, including their latest funding position

### **Policy/paragraph wording changes will be made as follows:**

Some changes are proposed to the safeguarding maps in Appendix 3 to reflect County Council comments. Additional supporting text is also proposed to be added on the context for the safeguarding areas.

Additional text is proposed in TRANS 3 to note that feasibility work including full environmental and archaeological assessments will be needed as schemes are progressed

### **Policy TRANS4: Transport assessments, Transport Statements and Travel Plans**

Overall 29 people commented on this policy:

- Support 5
- Comment 19
- Object 5

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

1. Concern over the combined impact of development at Culham and Berinsfield on the A4074
2. Roads should be delivered before housing
3. Need to consider cumulative impacts of developments, including those outside the district
4. Some clarity over some of the terms used in the policy would be useful
5. Chalgrove airfield would not support sustainable transport choices

**Oxfordshire County Council** – policy and supporting text should refer to Oxfordshire County Council guidance: Transport for new developments: Transport Assessments and Travel Plans (March 2014).

**Highways England** – support this policy, it is in line with the NPPF. Where appropriate, the scope of a transport assessment should be agreed with Highways England.

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

The policy and supporting text for this policy states that the scoping of transport assessments should be in line with the latest County Council guidance.

#### **Policy/paragraph wording changes will be made as follows:**

Add bullet: 'Where appropriate, the scope of a transport assessment should be agreed with Highways England'

#### **Policy TRANS5: Consideration of development proposals**

Overall 20 people commented on this policy:

- Support 9
- Comment 6
- Object 5

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

1. Concern that the requirements of this policy could not be applied to development at Chalgrove airfield
2. Strategic public transport projects should be included
3. Bus company operators should be involved in the early stages of planning
4. Some comments related to specific infrastructure projects (eg Northern Didcot perimeter road)
5. It is unbalanced towards sustainable transport.

No statutory consultees commented on this policy.

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

TRANS5 as worded does not preclude strategic public transport projects coming forward. This would be done in partnership with Oxfordshire County Council and other agencies.

TRANS2 deals specifically with sustainable transport.

References to the Oxford-Cambridge expressway are included in the publication version of the plan.

We note the comments from Oxford Bus Company and reference to emerging CIHT guidance.

**Policy/paragraph wording changes will be made as follows:**

No changes.

**Policy TRANS6: Rail**

Overall 13 people commented on this policy:

- Support 5
- Comment 2
- Object 6

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

1. Wish to see the Local plan promote increased car parking at Cholsey and Goring train stations
2. The promotion of roads vs public transport/ walking and cycling is currently unbalanced to the detriment of sustainable transport
3. Reduce speed limit in residential areas to 20mph
4. Object to moving or extension to parking at Didcot railway station which would impact upon Ladygrove
5. Rail improvements should not impact upon the AONB

**Oxfordshire County Council** requested that the text supporting this policy should refer to the opportunities offered by East West Rail in providing strategic connectivity from Didcot and Culham via Oxford and onward to Milton Keynes and Cambridge and more strongly support the case for upgrades to rail capacity between Didcot and Oxford, including for freight, and the need for an expansion and potential relocation of Culham station. References to upgrades to smaller stations should be deleted, as the business case for rail improvements will only be justified on the back of planned significant housing and employment growth.

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

The Local Plan does seek to promote more sustainable patterns of travel, but also recognises that this can be challenging in a rural District. The opportunity to increase car parking provision is supported. Rail travel is supported and it is accepted that there exist opportunities by increasing rail capacity. The Local Plan does not have the ability to change speed limits.

**Policy/paragraph wording changes will be made as follows:**

We will seek opportunities to increase car parking where this is practicable to do so. Text will be added to the Plan to reflect the potential which exist in terms of rail capacity/facility upgrades and connections.

### **Policy TRANS7: Development generating new lorry movements**

Overall 14 people commented on this policy:

- Support 7
- Comment 2
- Object 5

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

1. Wish to see freight and warehousing discouraged in the District. Limits should be placed upon operating/travel hours.
2. The land included to be safeguarded as a route at Stadhampton is unsuitable because it would disrupt the rural way of life for residents to the north. It would harm views, disrupt wildlife, heritage assets, footpaths and create pollution.
3. The promotion of roads vs public transport/ walking and cycling is currently unbalanced to the detriment of sustainable transport and wish to see inclusion of public transport schemes in the policy.
4. Traffic management schemes should be required for all but the smallest developments.
5. Those parish councils which responded generally supported the policy, though advised that consideration should be given to the impacts on residents and the environment.

**Highways England** is keen to work with SODC in regards to lorry movements. Where appropriate, the scope of the assessment should also be agreed with Highways England. Highways England is supportive of this Policy which aligns with the principles of NPPF and Circular 02/2013.

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

The identification of safeguarded land across the District provides the opportunity for transport mitigation to take place if this is required in direct relation to development. The routes have been identified through working with the County Council and would provide improved, less congested access for transport. We will continue to work with Highways England in relation to the issue of lorry movements and assess the situation and any corresponding mitigation to be put in place.

### **Policy/paragraph wording changes will be made as follows:**

No change

### **Policy TRANS8: Community Facilities and Rural Transport**

Overall 12 people commented on this policy:

- Support 6
- Comment
- Object 6

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

1. This policy is too simplistic and there was concern it could not be implemented

2. Chalgrove village would lose existing services and facilities to the new development
3. There was general support for improving rural transport

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

We note the support for the aims of this policy and will consider whether it can be strengthened.

**Policy/paragraph wording changes will be made as follows:**

No change

**Oxford to Cambridge Expressway Comments:**

Significant concern raised by parish councils and residents about the potential impact on Green Belt, the Thame Valley and rural communities if the Ox to Cambridge expressway routes through South Oxfordshire. Also, reference to the need for South Oxfordshire to consider impacts in their plan.

## Natural and Historic Environment

Overall 310 people commented on this chapter:

- Support 130
- Comment 94
- Object 86

### Paragraph 8.10 – Green Belt

Overall 33 people commented on this policy:

- 3 Support
- 15 Comment
- 15 Object

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

1. The council should change GB around Oxford to allow development. Locating development close to urban areas is more sustainable than remote areas in line with paragraph 84 of the NPPF (need to promote sustainable patterns of development). Channel development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.
2. Support for the removal of GB around Wheatley and also concern of a lack of consistency with regard to the release/retention of GB around Wheatley.
3. Add additional GB to compensate for loss of GB
4. The council should protect the GB.
  - a. Need to keep Oxford City separate from surrounding villages.
  - b. Character of the small villages of Culham, Clifton Hampden, Burcot and other villages would be destroyed due to GB release.
  - c. Brownfield sites should be considered before GB release
5. The exceptional circumstances to release GB have not been demonstrated.
  - a. Removing GB around Berinsfield to support regeneration of a deprived area applies more strongly to deprived areas around Oxford such as Blackbird Leys which is more deprived than Berinsfield. Greater scope for regeneration benefits in this location.
  - b. Council previously stated that the need to supply more housing is not considered to be an exceptional circumstance for a review of the Green Belt.
  - c. It is not clear why the options for development outside of the GB and considered in previous consultations have now been discounted.

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

The Green Belt is covered by paragraphs 79 to 92 of the NPPF and the Government advises that once established, Green Belt boundaries should only be altered in exceptional circumstances. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. Green Belt boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent. This guidance has been used in preparing the emerging local plan.

Meeting housing need alone is not sufficient to justify the exceptional circumstances to remove land from the Green Belt. The unmet needs of Oxford City could be met anywhere within the district and it is not the case that this is tied to any one location or site. To attempt to do so could limit the flexibility of the plan.

An 'Issues and Scope' consultation took place in June 2014 where the council gathered opinions on the location of new development and the future of the Oxford Green Belt. As a result of this consultation there was strong support for the majority of growth to take place in the 'Science Vale' area. There were mixed views on whether the Green Belt should be altered or remain the same, however many respondents had strong views that the Green Belt around Oxford should be protected to prevent the sprawl of the city.

A 'Preferred Options' consultation took place in June 2016 and the issue of Green Belt proved to be important, with a mixture of views over whether Green Belt should remain the same or be changed. Some respondents favoured a release of Green Belt land around Oxford to allow the city's expansion whilst others favoured a retention of the Green Belt around Oxford. Many respondents continued to support the strategy of focusing development within the Science Vale area and suggested further development around the Culham Science Centre.

The second 'Preferred Options' consultation proposed Green Belt changes around Berinsfield, Culham Science Centre and Wheatley. Other strategic options both within and outside of the Green Belt have been assessed within the Sustainability Appraisal. The alternative sites within the Green Belt present less sustainable options than the strategic sites contained within the second preferred options. The council is opposed to alteration of the Green Belt on the edge of Oxford City as this would lead to further sprawl of the city and the sites in this location have not presented exceptional circumstances. The council supports the need to keep Oxford City separate from surrounding villages. The alternative strategic sites outside of the Green Belt also present their own sustainability issues.

The council considers that the need to supply more housing is not an exceptional circumstance for a review of the Green Belt. The council considers the area around Culham Science Centre to be a sustainable location with good links to employment at the science centre and at Didcot. This location is in line with the support received for the focus of development within the Science Vale area and development in this location would support this objective. The site also has a direct train line to Oxford with potential for Culham train station to be improved. Therefore, there are sustainable transport links to employment opportunities and services in Oxford, Didcot and the Science Vale. The council believes that there are exceptional circumstances for the release of Green Belt land in this location.

The removal of land around Berinsfield is a policy requirement of the adopted Core Strategy and the proposal to remove land from the Green Belt in this location is a continuation of this policy. The exceptional circumstances for the release of this Green Belt land have already been demonstrated through the examination and adoption of the Core Strategy. In addition, Berinsfield has good



links to the Science Vale area and the release of this land is to support the regeneration of Berinsfield.

The council recognises that there are also regeneration priorities within areas of Oxford. The retention of the Green Belt around Oxford will serve to meet the five purposes of the Green Belt as set out in the Framework.

The locations of land to be removed from the Green Belt are considered by the council to be at a sufficient distance to protect the special historic setting of the of Oxford and do not make a significant contribution towards the purposes of checking the unrestricted sprawl of Oxford.

The council is preparing a topic paper on the exceptional circumstances for the changes to the Oxford Green Belt and further explanation on the selection of the strategic allocations.

It has been suggested that the council allocate 'Brownfield' sites before the release of Green Belt land. This is part of the reason for the proposed changes to the Green Belt. Due to the nature of the district there are few Brownfield options available. The council considers Oxford Brooks University at Wheatley to be a Brownfield site and will review its position on the release of Green Belt here. Culham Science Centre is also Brownfield. Chalgrove Airfield is classed as partially Brownfield.

It is not considered that additional land should necessarily be added to the Green Belt designation to simply 'make up' for land removed. The addition of additional Green Belt land would not serve the five purposes as set out in the Framework.

**Policy/paragraph wording changes will be made as follows:**

No changes as covered by other parts of the LP and the NPPF.

**Policy ENV1: Landscape and countryside**

Overall 72 people commented on this policy:

- Support 20
- Comment 26
- Object 26

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

1. Remove Chalgrove Airfield from the plan, impact of Chalgrove on rural area
2. Need more recognition of nature reserves and Green Infrastructure
3. Several comments on AONB including:
  - a. Monitor the amount of development in AONB
  - b. Should have a specific policy or model policy for the AONB,
  - c. Policy should be clearer on when development will be permitted in AONB or NDP allocations within AONB
  - d. Local Plan should refer to AONB management plans
4. Strategic sites may lead to landscape harm
5. Policy should prevent coalescence of settlements unless all other options have been explored

6. Policy should mention the Green Belt
7. Several comments on point iii of the policy
  - a. "Development will **only** be permitted where it protects or enhances:",
  - b. "Development will be permitted where it protects or **where possible** enhances:",
  - c. Point b should refer to the villages and towns as well as Oxford etc
8. Policy should mention impact of infrastructure on landscape and countryside
9. More reference to trees and forestry is required including a requirement for early planting of trees on developments, and add "Appropriate landscaping using a range of suitable native trees. "
10. No explicit reference to the NPPF provisions for local green space designation

**Historic England** suggested the policy could mention Oxfordshire Historic Landscape Character Assessment

**Natural England** noted that sites of Least Environmental Value - In accordance with the NPPF, the plan's development strategy should seek to avoid areas of high environmental value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and should consider the direct and indirect effects of development on land within the setting of designated landscapes.

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

The issues relating to any possible impact of development at the strategic sites are being assessed through the allocation process. Any planning application on the strategic sites and any other site, along with infrastructure proposals, would need to accord with local and national planning policy which seeks to protect the landscape of South Oxfordshire.

Policy ENV1 deals with landscape and countryside. Issues relating to nature reserves and green infrastructure are dealt with elsewhere in the emerging plan.

References are made to the AONB throughout the Local Plan. It is covered by the NPPF, specifically paragraphs 115 and 116, so no specific AONB policy is required.

The Green Belt is also referenced throughout the Local Plan. It is also covered by the NPPF, paragraphs 79 to 92, so no specific Green Belt policy is required

The policy refers to the protection and enhancement of the attractive landscape setting of settlements or the special character and landscape setting of Oxford. Therefore, the policy seeks to protect the landscape setting of villages and towns. The policy refers to the protection of all types of landscapes which includes features such as trees against inappropriate development

The Local Plan is supported by an evidence base which includes a Sustainability Appraisal and Habitats Regulation Assessment to support the selection of sites of least environmental value. The plan is also supported by the Oxfordshire Historic Landscape Characterisation Project and a Landscape Character Assessment.

**Policy/paragraph wording changes will be made as follows:**

We have revised the wording of the policy and this includes a specific reference to “the Oxfordshire Historic Landscape Characterisation Project.”

**Policy ENV2: Biodiversity - Designated Sites, Priority Habitats and Species**

Overall 22 people commented on this policy:

- Support 9
- Comment 5
- Object 8

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

1. Ecological value of Chalgrove Airfield (bats), Wick Farm is important
2. Ecological Baseline Surveys are required to inform the development of sites
3. Add “valued landscapes”
4. Impact of transport infrastructure on Special Areas of Conservation
5. 'sites of international nature conservation importance' should not be limited to SAC
6. Remove 'Proposed Local Wildlife Sites' in the list of sites to be protected from direct or indirect effects

**Natural England** advised that clarity is required about the requirements for Special Areas of Conservation (SACs), Habitats Regulations, SSSIs and ancient woodland and veteran trees.

**The council’s summary response to the main themes**

Comments questioned if the ecological value of potential development sites had been assessed. The council is continuing to build its evidence base and initial desk based surveys have been undertaken within the Sustainability Appraisal and Habitats Regulation Assessment. Further information is being gathered. The ecological impacts of any development, including potential development at Chalgrove Airfield will be assessed during the planning process.

The issue of “valued landscapes” was raised. The Framework advises that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils. Policy ENV2 relates to biodiversity rather than landscape which is dealt with in draft policy ENV1.

Comments asked after the impact of transport infrastructure on biodiversity and (Special Areas of Conservation). Proposals for transport infrastructure will be assessed against the policies of the adopted development plan and the Framework which seek to conserve and enhance the natural environment. Policy

ENV2 advises that the highest level of protection will be given to sites of international nature conservation importance (Special Areas of Conservation).

Mention was made of including Special Protection Areas and Ramsar sites within the policy however neither of these types of areas are located within the district and nor are they nearby.

Natural England asked about the requirements of the Conservation and Habitats Regulations. These requirements are set out in the Habitats Regulations Assessment which forms part of the evidence base of the local plan. Other changes suggested by Natural England have been included in changes to the policy.

**Policy/paragraph wording changes will be made as follows:**

We have revised the policy and supporting text to clarify the different requirements of each type of habitat of designations as we have been advised.

**Policy ENV3: Biodiversity – non-designated sites, habitats and species**

Overall 20 people commented on this policy:

- Support 8
- Comment 4
- Object 8

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

1. Ecological value of Chalgrove Airfield (bats)
2. All development should make provision for green spaces that can act as wildlife corridors, to prevent populations on adjacent sites becoming fragmented.
3. Ecological Baseline Surveys required to inform the development of sites
4. Policy should seek a net gain in biodiversity. Major applications should demonstrate no net loss by using an accepted Biodiversity Impact Assessment Calculator unless otherwise agreed with the Council
5. Policy should confirm the commitment to protect and enhance the Conservation Target Areas (CTA)
6. Development in the Green Belt will cause environmental damage
7. Policy should state that development should result in an **overall** no net loss in biodiversity rather than a no net loss in biodiversity

**Natural England** welcomed the approach proposed in these policies. they advise that development should be seeking to achieve a net gain in biodiversity, and they welcomed the use of biodiversity accounting to ensure that this is achieved. We suggest that the onus could be placed on the developer to undertake the biodiversity accounting using a recognised biodiversity metric, in order to demonstrate that the application can achieve a net gain.

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

Comments questioned if the ecological value of potential development sites had been assessed. The council is continuing to build its evidence base and initial

desk based surveys have been undertaken within the Sustainability Appraisal and Habitats Regulation Assessment. Further information is being gathered. The ecological impacts of any development, including potential development at Chalgrove Airfield will be assessed during the planning process.

Comments suggest that all development should make provision for green spaces that can act as wildlife corridors. The Local Plan is supported by a Green Infrastructure Strategy, a Sports and Leisure Strategy. Development should also be in accordance with the adopted Design Guide which requires green space.

Protection of Conservation Target Areas is included within policy ENV2.

The Green Belt is not designated to protect biodiversity and any development will need to accord with the policies of the adopted development plan and the Framework which seeks to conserve and enhancing the natural environment.

The policy will be revised to be in accordance with the Framework which seeks to attain a net gain in biodiversity.

**Policy/paragraph wording changes will be made as follows:**

We have revised the policy and support text following the advice received, in particular with reference to a net gain of biodiversity.

**Policy ENV4: Watercourses**

Overall 22 people commented on this policy:

- Support 10
- Comment 7
- Object 5

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

1. Wording on buffer zones should be in the policy rather than the supporting text
2. SuDS should be a mandatory requirement
3. Policy needs to consider flood prevention work being undertaken in Oxford
4. Policy should consider impact of flooding downstream
5. Chalk streams should be added to the list of particularly valuable elements on which particular importance will be placed.
6. Policy should consider the impact of woodland on watercourses
7. Concern regarding proposed quarry at Clifton Hampden
8. Development at Wick Farm would cause flooding
9. Where there are significant benefits in new appropriately designed crossing points for watercourses (e.g. footbridges), these must be located within the buffer zone of a watercourse.
10. Buffer zone should be 8m rather than 10m as this is what is in Planning Practice Guidance (ref Paragraph: 068 Reference ID: 7-068-20140306)

**Natural England** welcomed the approach proposed in these policies. they advise that development should be seeking to achieve a net gain in biodiversity, and they welcomed the use of biodiversity accounting to ensure that this is achieved. We

suggest that the onus could be placed on the developer to undertake the biodiversity accounting using a recognised biodiversity metric, in order to demonstrate that the application can achieve a net gain.

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

Several changes to the policy and the supporting text have been made following the consultation and through working with the Vale of White Horse District Council where watercourses are also important. However, many of the details raised during the consultation relate to issues of flood-risk which are covered elsewhere in the emerging local plan and also by the Framework. Details of flood prevention are also detailed in the Strategic Flood Risk Assessment which forms part of the evidence base of the Local Plan. The requirement for a 10m buffer is required to give species and habitats protection from increased disturbance associated with development. It should be noted that in addition to any planning permission, consent is required from either the Environment Agency or the Lead Local Flood Authority to carry out any work within 8 metres of a watercourse.

### **Policy/paragraph wording changes will be made as follows:**

We have revised the policy and supporting text as advised.

### **Policy ENV5 Green Infrastructure in new developments**

Overall 23 people commented on this policy:

- Support 8
- Comment 9
- Object 6

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

1. Add reference to the Chilterns AONB Management Plan
2. Policy should also include existing green infrastructure
3. Set a target of 95% of the population having provision for ANGSt level 1 (300m 2+ ha) met by the end of the Local Plan period, i.e. i.e. all new development must contribute to an increase in the provision of the ANGSt baseline – para 114 of NPPF, inclusion of a specific target that 95% of all SODC residents should live within 300m of an accessible natural greenspace of at least 2 ha in size
4. New development must enhance and contribute to Conservation Target Areas and Green Corridors
5. Remove the phrase “where possible”
6. Add a mandatory requirement for SUDS and the concept of using natural flood management in rural areas
7. Should be an objective to encourage active lifestyles and tackle obesity
8. Set target to protect all existing green spaces from development within Didcot Garden Town. Ladygrove Loop should be marked as amenity green space
9. There are outstanding green infrastructure items that still require delivery, from the Core Strategy

**Forestry Commission England:** In the wider planning context the Forestry Commission encourages local authorities to consider the role of trees in delivering

planning objectives as part of a wider integrated landscape approach. For instance, through the inclusion of green infrastructure (including trees and woodland) in and around new development

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

The AONB is referenced throughout the Local Plan. Comments were raised in relation to distances of new housing to green spaces and GI. The policy sets out quality standards and GI requirements within the Green Infrastructure Strategy which forms part of the evidence base of the local plan and also refers to good practice guidance and the adopted South Oxfordshire Design Guide. The Local Plan also contains a policy on Open Space, Sport and Recreation in new residential development which sets out standards on distances to open space. Protection of Conservation Target Areas is included within policy ENV2. Comments also advise that the authority should be encouraging active lifestyles and tackling obesity. Objective 6.3 of the emerging plan is to ensure all communities have access to the services and facilities they value, supporting the health and wellbeing of everyone.

### **Policy/paragraph wording changes will be made as follows:**

We have revised the policy and supporting text for clarity and robustness. We have included references to the AONB management plan and the Didcot Garden Town

### **Policy ENV6: Historic Environment**

Overall 25 people commented on this policy:

- Support 10
- Comment 6
- Object 9

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

1. Conservation Area Appraisals should be undertaken
2. Berinsfield allocation will impact archaeological remains
3. Development at Chalgrove Airfield will impact the historic battlefield site
4. Need a policy to prevent the coalescence of villages
5. Wick, Stowford and Bayswater Farms, as well as Lower Elsfield should be protected from development
6. Importance of a grade 1 listed building close to OBU, Wheatley
7. Need to mention of the setting of Oxford and the views towards the City and outwards from it. Reference be made to the Historic England study Assessment of the Oxford View Cones October 2015.
8. Policy not required, duplicates NPPF
9. Policy should be amended to make it clear, in accordance with the NPPF, that proposals for new development should conserve or enhance the significance of heritage assets.
10. As it is currently drafted, this 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.

**Historic England** do not consider that Policy ENV 6 delivers the conservation and enhancement of the historic environment and so have suggested amendments.

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

Local Plan policies relating to the historic environment are covered by paragraph 126 of the NPPF. Any potential impacts of development on the historic environment will be considered against local and national policies and the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed allocation sites will also be considered against any potential impact on the historic environment in line with these policies and the act. Policy ENV1 seeks to protect the attractive landscape setting of settlements or the special character and landscape setting of Oxford. Local and national policies and the act also seek to protect heritage assets and their settings.

The policy and the other policies relating to heritage assets have been revised following consultation comments and through work with the Vale of White Horse District Council. The revised policy sets out measures for achieving conservation and enhancement and presents clear policies on what will or will not be permitted and where and a clear indication of how a decision maker should react to a development proposal. The policies set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

### **Policy/paragraph wording changes will be made as follows:**

We have comprehensively redrafted the policy.

### **Policy ENV7 Demolition of Listed Buildings**

Overall 9 people commented on this policy:

- Support 7
- Comment 1
- Object 1

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

1. Policy duplicates the NPPF and is superfluous

**Historic England** suggest that Policy ENV7 would be better if it gave greater information on what exceptional circumstances might be.

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

As above, the framework advises that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. The policy relates to listed buildings and to ensure clarity the council has merged policies ENV7 and 8 to create a single policy on listed buildings.

### **Policy/paragraph wording changes will be made as follows:**

The policy has been deleted and merged with ENV8



### **Policy ENV8 Alteration of and Extension to Listed Buildings**

Overall 7 people commented on this policy:

- Support 6
- Comment
- Object 1

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

1. Policy duplicates the NPPF and is superfluous

**Historic England** welcomed Policy ENV8 in principle, but cited that paragraphs 133 and 134 of the NPPF make it clear that for benefits to outweigh harm to designated heritage assets, those benefits must be public, and to outweigh substantial harm to assets of the highest significance, they must be substantial public benefits.

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

The policy has been revised following consultation comments and through work with the Vale of White Horse District Council. The revised policy sets out measures for achieving conservation and enhancement and presents clear policies on what will or will not be permitted and where and a clear indication of how a decision maker should react to a development proposal.

### **Policy/paragraph wording changes will be made as follows:**

We have comprehensively rewritten the policy and combined it with ENV7

### **Policy ENV9: Conservation Areas**

Overall 13 people commented on this policy:

- Support 8
- Comment 3
- Object 2

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

1. It would be helpful if the word setting was more clearly defined to include site-lines and views of conservation areas.
2. The third paragraph should be amended to include Neighbourhood Development Plans which may include local design requirements.  
"Development should be in accordance with South Oxfordshire's Design Guide and the relevant Neighbourhood Development Plan"
3. Policy duplicates the NPPF and is superfluous

**Historic England:** Welcomed Policy ENV9 in principle, but suggested it should refer to the special interest, character and appearance of Conservation Areas. Paragraphs 133 and 134 of the NPPF make it clear that for benefits to outweigh harm to designated heritage assets (such as Conservation Areas), those benefits must be public, not just demonstrable.

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

The policy has been revised following consultation comments and through work with the Vale of White Horse District Council. The revised policy sets out measures for achieving conservation and enhancement and presents clear policies on what will or will not be permitted and where and a clear indication of how a decision maker should react to a development proposal.

### **Policy/paragraph wording changes will be made as follows:**

We have comprehensively revised the policy and also added the following text to the end of para 8.42

*When undertaking conservation area appraisals the opportunity will be taken to produce and update lists of locally important non-designated heritage assets and a condition survey of listed buildings.*

### **Policy ENV10: Archaeology**

Overall 11 people commented on this policy:

- Support 8
- Comment 2
- Object 1

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

1. Chalgrove is home to both Roman and Medieval archaeological remains
2. The safeguarded land for the Stadhampton bypass crosses a site that according to a survey by Oxon County Council Archaeology Dept represents a significant bronze age and Neolithic ritual site centred on the bend of the R.Thame between Stadhampton and Chiselhampton.
3. Effect of any change to the water table should be considered in any development due to the effect this can have on archaeological remains
4. Policy duplicates the NPPF and is superfluous

**Historic England** Welcomed Policy ENV10 in principle, including the reference to non-designated archaeological sites or deposits, but suggested that the Policy should make it clear that development proposals affecting the significance of non-designated archaeological sites or deposits of significance equal to that of a nationally important monument will be assessed as though those sites or deposits are designated i.e. against the same criteria as for assessing development proposals affecting scheduled monuments.

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

Any potential impacts of development on the historic environment will be considered against local and national policies and the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed allocation sites will also be considered against any potential impact on the historic environment in line with these policies and the act.

### **Policy/paragraph wording changes will be made as follows:**

We have comprehensively revised the policy and also added the following text to paragraph 8.43

*A network of historic routes also exist as archaeological features in the district, ranging from pre-historic tracks, Roman roads, medieval coffin ways, salt roads, and droveways, to later turnpike roads. These routes are integrated into the district's landscape and serve an important function in linking settlements and forming a unique setting for the district's distinctive landscape features and will therefore be protected.*

### **Policy ENV11: Historic Battlefields, Registered Parks and Gardens and Historic Landscapes**

Overall 13 people commented on this policy:

- Support 7
- Comment 5
- Object 1

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

1. Very significant bridge at the end of the Burycroft where a very significant battle was fought in the English Civil War. See The Battle of Culham Bridge on 11/01/1645
2. Impact of Chalgrove Airfield development on Historic Battlefield site
3. Important views in the direction of Elsfeld Village
4. Policy duplicates the NPPF and is superfluous

**Historic England** welcomed Policy ENV11 in principle, but cited that paragraphs 133 and 134 of the National Planning Policy Framework make it clear that for benefits to outweigh harm to designated heritage assets (such as Registered Battlefields, Parks and Gardens), those benefits must be public, and to outweigh substantial harm to assets of the highest significance, they must be substantial public benefits.

#### **Heritage at Risk:**

Paragraph 126 of the National Planning Policy Framework requires local planning authorities to set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (our underlining). There are currently 12 assets on the Historic England Heritage at Risk Register within South Oxfordshire District but as, outside London, the Register does not include grade II listed buildings, the number of assets at risk is likely to be greater. The number is also likely to fluctuate during the life of the Plan. The 2nd Preferred Options does not address the issue of heritage assets at risk at all. It therefore fails to set out a positive strategy for the conservation and enjoyment of the historic environment and consequently fails to be consistent with national Policy. To rectify this deficiency, we suggest the addition of wording to the Plan along the lines of: The Authority will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development

schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.

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

Any potential impacts of development on the historic environment will be considered against local and national policies and the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed allocation sites will also be considered against any potential impact on the historic environment in line with these policies and the act. Policy ENV11 seeks to protect historic battlefield sites such as Chalgrove. The effect of an application on the significance of a non-designated heritage asset will be considered in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The policy has been updated following consultation comments to ensure that development presents public benefits.

### **Policy/paragraph wording changes will be made as follows:**

We have revised the policy and supporting text following the advice received and added new appendices to the local plan:

- List of Scheduled Monuments, Parks and Gardens, Battlefield, Conservation Areas (with date of designation), CA appraisals and their date,
- Link to Historic England's list of listed buildings
- Link to Heritage at Risk register

### **Policy ENV12 Pollution - Impact from neighbouring and/or Previous Land Uses on new Development (potential receptors of pollution)**

Overall 16 people commented on this policy:

- Support 11
- Comment 2
- Object 3

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

1. Hazardous substances on Chalgrove Airfield prevents its development
2. New development should not lead to the loss of existing development or uses
3. Plan should support a dark skies policy
4. Proposed bypass at Watlington would lead to pollution
5. Policy will protect Royal Mail operations

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

The policy advises that development will not be permitted if it is likely to be adversely affected by existing pollution and advises that the occupiers of new development will not be subject to the effects of pollution. Therefore, potential development at the proposed allocations in the emerging plan such as at

Chalgrove would be assessed against this policy. Existing uses would be protected from new development proposals nearby.

**Policy/paragraph wording changes will be made as follows:**

Update the title for clarification

**Policy ENV13 Pollution - Impact of Development on Human Health, the natural Environment and/or Local amenity (potential sources of pollution)**

Overall 19 people commented on this policy:

- Support 5
- Comment 9
- Object 5

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

1. Development at Chalgrove Airfield, Wick Farm and Lower Elsfield would be a source of pollution
2. SODC is attempting to disperse Oxford City's unmet need across the whole of the District. This is unsustainable as it will lead to unnecessary private vehicle use and therefore have an effect upon the environment and public health that should be mitigated either by the selection of sites that are serviceable by rapid public transport or sites that are much closer to the area of housing need.
3. Impact of noise from RAF Benson should be considered. Rule out new housing at Benson.
4. Stronger controls of noise from air source heat pumps needed
5. Protection of dark skies should be included
6. Pollution in Thame should be assessed

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

The Local Plan is subject to a Sustainability Appraisal to ensure that the plan achieves sustainable development. The policy seeks to promote sustainable development and locate new development in locations where pollution would be reduced. The policy considers planning applications in terms of potential impact of seeking to reduce pollution including noise and light pollution. Therefore, the impact of new development on dark skies is a consideration under this policy.

Development proposals close to existing sources of pollution such as potential noise from RAF Benson would be considered against policy ENV12 as new housing in this location could be a receptor of pollution.

**Policy/paragraph wording changes will be made as follows:**

Update the title for clarification

### **Policy EP1: Air Quality**

Overall 22 people commented on this policy:

- Support 5
- Comment 10
- Object 7

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

1. SODC should, with OCC, provide workable Air Quality strategies for Watlington, Henley and Wallingford
2. Chalgrove Airfield is not a sustainable location and would lead to air pollution and worsen pollution in AQMAs
3. Policy too vague and too weak. Need to monitor a wider range of pollutants, commit to the development and delivery of an Air Quality Strategy and Action Plan for the whole district, make green roofs mandatory on any new flat roofs in AQMA and to launch a programme of retrofitting green roofs and vegetation in AQMA.
4. There must be effective measures in place, funded by developers, to reduce the air pollution to acceptable and legal levels.
5. Council should measure the cumulative impact of pollution

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

The policy seeks to protect air quality and minimise air pollution. The Air Quality Action Plan in addition to other guidance sets out how we will work with others, who have the power to make the necessary changes to tackle the air quality problems. Further information is available on the following website:

<https://oxfordshire.air-quality.info/local-air-quality-management/south-oxfordshire>.

The policy includes the cumulative impact of pollution.

### **Policy/paragraph wording changes will be made as follows:**

No change to policy.

### **Policy EP2: Hazardous substances**

Overall 7 people commented on this policy:

- Support 4
- Comment 2
- Object 1

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

1. Hazardous substances at Chalgrove Airfield prevent development of the site.

**HM Specialist Inspector of Health and Safety (Risk Assessment)** commented that they had no representation to make on this occasion. This is because the land allocated in your consultation document does not appear to encroach on the consultation zones of major hazard establishments or MAHPs. If there is no encroachment HSE does not need to be informed of the next stages in the adoption of the consultation document.

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

The policy seeks to control development within the vicinity of hazardous substances or activities. Any development proposals would be assessed against this policy.

**Policy/paragraph wording changes will be made as follows:**

No changes are required.

**Policy EP3: Minerals Safeguarding areas**

Overall 9 people commented on this policy:

- Support 4
- Comment 3
- Object 2

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

1. Policy is too rigid and should consider sites within MSAs that are potentially unsuitable for minerals extraction.
2. Proposed development at Chalgrove Airfield would sterilise underlying sand and gravel
3. Clarity required on priorities of development of MSAs
4. This Policy is supported as it is consistent with and will help in the implementation of Policy M8 of the submitted Oxfordshire Minerals and Waste Local Plan
5. Minerals and Waste Comments Strategic Objectives 129. The strategic objectives do not explicitly include safeguarding of important mineral resources or re-use, recycling & recovery of waste, although the cross references to objectives in policies EP3, DES7 and DES8 suggest these matters are intended to be covered by the objectives. It would be clearer if the objectives explicitly included these matters. They were included as objectives in the documentation published in 2014 (see SA Scoping Report, Table 1, objectives 7 & 31). These matters are covered by the SA objectives in the SA report, March 2017 (Table 3, SA objectives 8 and 12).

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

Paragraph 143 of the NPPF sets out what local planning authorities should do when preparing local plans. Many of the requirements are set out in other policies in the Local Plan such as ENV12 and 13.

**Policy/paragraph wording changes will be made as follows:**

We have made no significant changes to this proposed policy

## Built Environment

Overall 163 people commented on this chapter:

- Support 69
- Comment 65
- Object 29

### Policy DES1: Delivering High Quality Development

Overall 24 people commented on this policy:

- Support 10
- Comment 11
- Object 3

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

1. Support for high quality development, in particular ensuring the development of neighbouring sites is integrated
2. Support for new development to meet the objectives and criteria set out in the South Oxfordshire Design Guide
3. The policy should refer to the Chilterns Buildings Design Guide
4. The policy should ensure that the Secure By Design principles are fully adopted by all new residential developments
5. The policy should refer to design policies within Neighbourhood Development Plans

There was also a request for the South Oxfordshire Design Guide to include more guidance on how to achieve high quality development within smaller villages and rural areas.

**Historic England** welcomed this policy.

**The Chiltern's Conservation Board** considered that the policy should refer to the Chilterns Buildings Design Guide. This was also suggested by members of the public.

**Thames Valley Police** highlighted the need to ensure that Secure by Design principles are fully adopted on all new residential developments and requested that the policy also acknowledge the impact of the fear of crime.

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

It is important to recognise that Policy DES1 cannot set out all the principles that would need to be followed in order to deliver high quality development. These requirements are set out in the South Oxfordshire Design Guide. The Design Guide makes reference to the Chilterns Buildings Design Guide. However, we recognise that it would be useful to signpost readers of this policy to the Chilterns Buildings Design Guide and will include reference to it within the supporting text. We agree that new development should meet the principles of Secure by Design and address the fear of crime as well as reducing the likelihood of crime. These principles are not set out in the Design Guide so we considered it important to refer to the Secure by Design principles within the supporting text and acknowledge the impact of the fear of crime within the policy.



We agree that all new development should also meet the policies set out in made neighbourhood development plans. Made neighbourhood development plans form part of the district's development plan. Planning legislation requires development to be in accordance with the development plan unless material consideration indicate otherwise. In response to this consultation we will be highlighting this requirement in policy STRAT1. Subsequently it does not need to be repeated within the policy.

**Policy/paragraph wording changes will be made as follows:**

- Add reference to the Chilterns Building Design Guide within the supporting text – “New development within the Chilterns Area of Outstanding Natural Beauty should meet the objectives and criteria set out in the Chilterns Buildings Design Guide.”
- Add reference to the principle of Secure by Design within the supporting text – “It is important that the places that we create are safe. To ensure that the development we deliver is designed to reduce the opportunity for crime, as well as the fear of crime itself, proposals must fully adopt the principles set out in the Secured by Design, design guides.”
- Acknowledge the impact of the fear of crime within the policy by adding – “...as well as the fear of crime itself.” to the end of the third paragraph.

**Policy DES2: Enhancing Local Character**

Overall 14 people commented on this policy:

- Support 6
- Comment 5
- Object 1

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

1. Support for enhancing local character
2. The policy should refer to the Chilterns Buildings Design Guide
3. The policy should refer to Conservation Area Character Appraisals
4. The policy should include further detail regarding residential amenity and the height, scale and massing of new residential development

**Historic England** welcomed this policy. They considered it would be helpful for the policy to refer to Conservation Character Area Appraisals.

**The Chiltern's Conservation Board** considered that the policy should refer to the Chilterns Buildings Design Guide. This was also suggested by members of the public.

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

As with Policy DES1 it is important to recognise that Policy DES2 cannot set out all the features that could add positively to local character as these features and the importance of these features will change with each locality. For this reason, the policy requires the positive features to be identified in a character assessment either prepared by the community as part of a neighbourhood plan or by the

applicant as part of the planning application. The absence of an amenity policy has been raised in relation to other parts of the plan and will be addressed. We recognise that it would be useful to signpost readers of this policy to the Chilterns Buildings Design Guide and will include reference to it within the supporting text.

We agree that it would provide clarity if the policy referred to the need to consider Conservation Area Appraisals where a development has the potential to impact upon a conservation area or the setting of a conservation area.

**Policy/paragraph wording changes will be made as follows:**

- Add reference to the Chilterns Buildings Design Guide within the supporting text – “New development within the Chilterns Area of Outstanding Natural Beauty should demonstrate how the design has been informed by the Chilterns Building Design Guide.”
- Add to policy “Proposals that have the potential to impact upon a conservation area or the setting of a conservation area should also take account of the relevant Conservation Character Appraisal”.

**Policy DES3: Design and Access Statements**

Overall 15 people commented on this policy:

- Support 6
- Comment 5
- Object 4

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

1. Design and Access Statements vary in quality and can be misleading
2. The policy should refer to the Chilterns Buildings Design Guide
3. The policy should include principles, measures and targets on tackling obesity
4. The current wording regarding consultation with existing communities is too vague and should also refer to consultation with communities in the surrounding area
5. Concerns regarding the implementation of this policy. The Local Planning Authority should refuse to accept applications where the Design and Access Statement does not meet the criteria set out in the policy.

**The Chiltern’s Conservation Board** considered that the policy should refer to the Chilterns Buildings Design Guide. This was also suggested by members of the public.

**The council’s summary response to the main themes**

We acknowledge that the quality of Design and Access Statements can vary and this is why we consider the requirements set out in Policy DES3 to be so important.

We recognise that it would be useful to signpost readers of this policy to the Chilterns Buildings Design Guide and will include reference to it within the supporting text.

The aim of this policy is to ensure that specific important information is included within a Design and Access Statement. It is important to recognise that Policy DES3 cannot set out all the information that should be included in a Design and Access Statement as this should be proportional to the proposal. Additional guidance regarding the detailed content of a Design and Access Statement is set out in the South Oxfordshire Design Guide. Given this, Policy DES3 is not the appropriate policy to tackle obesity. However, we recognise that there is limited reference to health and wellbeing within the plan and will be undertaking a Health Impact Assessment to ensure that these issues are addressed.

We agree that consultation with local communities is an important part of the design process, including communities in the surrounding area.

We agree that all new development should also meet the policies set out in made neighbourhood development plans. Made neighbourhood development plans form part of the district's development plan. Planning legislation requires development to be in accordance with the development plan unless material consideration indicate otherwise. In response to this consultation we will be highlighting this requirement in policy STRAT1. Subsequently it does not need to be repeated within the policy.

With regards to implementing the policy, the planning case officer is qualified to identify whether the requirements of Policy DES3 have been met. In order to ensure the timely processing of applications and unnecessary delay, this assessment would take place after the application has been registered. The case officer has the opportunity to require additional information once an application has been registered and Policy DES3 will support them in doing so with regards to the content and quality of the Design and Access Statement. The South Oxfordshire Design Guide provides clear guidance on what should be included within the detailed content of a Design and Access Statement and this link is clearly made within Policy DES3.

**Policy/paragraph wording changes will be made as follows:**

- Add reference to the Chilterns Buildings Design Guide within the supporting text – “Proposals within the Chilterns Area of Outstanding Natural Beauty should demonstrate, as part of the Design and Access Statement, how the design has been informed by the Chilterns Building Design Guide.”
- Amend policy to read “How consultation with the existing community and communities in the surrounding area has informed the design of the development.”

**Policy DES4: Masterplans for allocated sites and major development**

Overall 17 people commented on this policy:

- Support 8
- Comment 6
- Object 3

- . The following key themes were identified in response to this policy:
  1. Support for requiring allocated sites and major development to be accompanied by a Masterplan
  2. The policy should clarify that a Masterplan is required with a formal planning application
  3. Suggestions were made regarding criteria and/or detail that should be added to the policy. This related to Sustainable Urban Drainage (SUDS), the historic environment, landscape screening, views and concerns of local residents and key stakeholders and health and wellbeing
  4. Masterplans should be prepare for every site as part of the plan-making process to inform site selection

**Historic England** welcomed this policy.

**Oxfordshire County Council** recommended including the need for development to improve health and wellbeing as a requirement of the policy.

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

Masterplans are an important tool for communicating how an applicant intends to deliver a high quality development. They are useful throughout the design process and application process. Policy DES4 requires the Masterplans prepared to demonstrate a clear link to the more detailed design principles established in the South Oxfordshire Design Guide. These principles do not need to be repeated within the policy.

#### **Policy/paragraph wording changes will be made as follows:**

No specific changes to this policy arising from responses to the consultation.

#### **Policy DES5: Outdoor Amenity Space**

Overall 12 people commented on this policy:

- Support 6
- Comment 5
- Object 1

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

1. Support for the provision of outdoor amenity space for all new dwellings
2. The size of a private garden should reflect the size of the dwelling (number of people living in the property)
3. Flats and apartments should have access to some shared private green space
4. Suggestions were made regarding additional requirements that should be added to this policy, including a mandatory requirement for Sustainable Urban Drainage (SUDS), encouraging active lifestyles and tackling obesity

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

The South Oxfordshire Design Guide sets out how outdoor amenity space should be designed to ensure that it is of a high quality. This includes minimum sizes for

different sized dwellings including flats and apartments. Applications are required to provide a robust justification if they are unable to meet these standards.

We recognise that there is limited reference to health and wellbeing within the plan and will be undertaking a Health Impact Assessment to ensure that these issues are addressed.

**Policy/paragraph wording changes will be made as follows:**

No specific changes to this policy arising from responses to the consultation.

**Policy DES6: Privacy and daylight**

Overall 9 people commented on this policy:

- Support 6
- Comment 2
- Object 1

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

1. Support for the protection of privacy and light
2. The policy should refer to the South Oxfordshire Design Guide
3. The policy should specify a minimum back-to-back separation of 25 metres

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

The South Oxfordshire Design Guide sets out a series of principles that should be met to achieve high quality design including a minimum back-to-back separation of 25 metres. The supporting text at 9.16 signposts readers to the design guide for detailed guidance.

**Policy/paragraph wording changes will be made as follows:**

No specific changes to this policy arising from responses to the consultation.

**Policy DES7: Efficient use of resources**

Overall 22 people commented on this policy:

- Support 5
- Comment 12
- Object 5

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

1. Consideration should be given to whether a new development would create an Air Quality Management Area (AQMA)
2. The policy should set a higher density requirement that 25 dwellings per hectare. The policy should clarify that the density requirement relates to 'net' density and not gross density.
3. Densities should be sympathetic to the local context/character
4. The policy should encourage incorporating renewable energy micro-generation as part of new development
5. The policy should encourage the reuse of buildings and land before new development
6. The policy should encourage recycling and composting

**Oxfordshire County Council** support this policy.

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

Development requirements in terms of air quality are set out in Policy EP1. This includes not permitting development that would lead to the creation of an Air Quality Management Area.

Historically planning policy in South Oxfordshire has required a minimum density of 25 dwellings per hectare, **unless this would have an adverse effect on the character of the area**. The Housing White Paper seeks to optimise the density of development and recognises that this needs to reflect local character and access to services and facilities. A range of respondents to the consultation have requested that the density requirement in South Oxfordshire be increased to ensure that land is used efficiently and subsequently less land is developed in overall terms. We agree that development within the district could in some cases achieve higher densities and will seek to raise the density requirement in line with the recommendations of the Housing White Paper. We agree that the policy should also clarify that this requirement refers to the net density of a site and not the gross density.

The policy already encourages the redevelopment of previously developed land. However, we agree that this encouragement could be extended to include the re-use of vacant buildings.

The policy encourages minimising waste and the provision for the recycling of waste on site as well as using recycled materials.

**Policy/paragraph wording changes will be made as follows:**

- Increase minimum density to 30 dwellings per hectare taking account of local character, and access to local facilities and services and clarify that the policy refers to net density rather than gross density.
- Include encouragement to re-use vacant buildings. Amend policy as follows – “Re-using vacant buildings and redeveloping previously developed land, provided the land is not of a high environmental value.”

**Policy DES8: Promoting sustainable design**

Overall 17 people commented on this policy:

- Support 6
- Comment 9
- Object 2

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

1. Support for the commitment to low carbon development
2. Water efficiency standard is unrealistic
3. The policy should include a requirement for all commercial development to have photovoltaics fitted to the roofs
4. The policy should refer to the use of locally sourced wood in construction and as a sustainable, carbon lean fuel

5. The policy sets the target for sustainable development too low. It should include requirements for renewable energy systems.

**Oxfordshire County Council** supported the policy. They considered that the policy should be more encouraging with regards to waste recycling, composting and recovery. They recommended that the policy should require developers to provide space for waste and recycling bins in new residential developments and that it should explicitly state that adequate facilities for the sorting, storage and collection of waste in residential (including communal storage) and non-residential development should be provided. They also considered that the policy should include requirements that would allow the provision for home composting in new dwellings.

**Oxfordshire Forestry Commission England** requested that the policy refer to the use of locally sourced wood in construction and as fuel.

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

The Council's Water Cycle Study supports the water efficiency standard being required.

While we do not have the evidence to require all commercial development to have photovoltaics fitted to the roofs, we agree that referring to specific sustainability standards for commercial development would strengthen the policy.

Requirements regarding the standard of new development in terms of sustainable design and construction have been subsumed into Building Regulations.

We agree that the plan would benefit from a specific policy requiring adequate facilities for waste collection and recycling on all new developments. We also agree that this policy could be encouraging with regards to waste recycling, composting and recovery.

We agree that it would be useful to highlight that there are different ways in which sustainable design can be promoted, for example using locally sourced wood.

#### **Policy/paragraph wording changes will be made as follows:**

- Highlight in the supporting text that there are different ways in which sustainable design can be promoted, for example using locally sourced wood – "Consideration should also be given to using locally sourced, more sustainable building materials and fuel, for example, locally sourced wood."
- Include specific policy dealing with waste collection and recycling.  
Add encouragement to policy regarding waste recycling, composting and recovery.

#### **Policy DES9: Renewable Energy**

Overall 11 people commented on this policy:

- Support 7
- Comment 3
- Object 1

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

1. Support for promoting renewable energy sources
2. There needs to be a stronger commitment to low carbon development. The strategic site policies have missed the opportunity for low carbon on-site energy generation.
3. The policy should encourage the development of heat networks
  - The policy should apply to systems for buildings as well as stand-alone schemes
  - Support for recognising the impact of renewable energy schemes on the landscape.

**Historic England** welcomed the references to the historic environment, both designated and non-designated assets.

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

Where appropriate the strategic site policies will encourage low carbon on-site energy generation.

We agree that this policy could do more to encourage different types of renewable energy sources, particularly at the domestic scale. We will seek to strengthen the policy and supporting text to reflect this.

### **Policy/paragraph wording changes will be made as follows:**

- Highlight that there are different types of renewable energy that can be considered within supporting text – “There are many forms of renewable energy. The most prevalent being wind, solar, biomass, geothermal and hydro power and biofuels. The most appropriate form of renewable energy for a development will depend on the scale of the development and the opportunities and constraints presented by its location.”
- Add reference to domestic scale renewable energy schemes to policy – “The Council encourages schemes for renewable and low carbon energy generation at all scales including domestic schemes.”

### **Policy DES10: New buildings or structures in the countryside and rural areas**

Overall 12 people commented on this policy:

- Support 3
- Comment 5
- Object 4

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

1. The policy is too open/permissive, especially in the context of the AONB
2. The policy requires more detail, for example, a definition of demonstrable need
3. The policy should restrict new buildings to agricultural or forestry use
4. The policy needs to be linked to Policy H5
5. The policy should refer to design policies within Neighbourhood Development Plans



**The Chilterns Conservation Board** consider the policy to be too permissive and suggested that the policy should restrict new buildings or structures within the countryside and rural areas to agricultural or forestry use.

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

We agree that the policy as written is too permissive and that, taking into account the role and character of the open countryside and rural areas within South Oxfordshire, development should be restricted to dwellings for agricultural and/or forestry workers and rural diversification.

We agree that this type of development should also meet the policies set out in made neighbourhood development plans. Made neighbourhood development plans form part of the district's development plan. Planning legislation requires development to be in accordance with the development plan unless material consideration indicate otherwise. In response to this consultation we will be highlighting this requirement in policy STRAT1. Subsequently it does not need to be repeated within the policy.

**Policy/paragraph wording changes will be made as follows:**

- Policy to be rewritten to restrict development in the countryside and rural areas to dwellings for agricultural and/or forestry workers and rural diversification.

**Policy DES11: Re-use of rural buildings**

Overall 10 people commented on this policy:

- Support 7
- Comment 1
- Object 2

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

1. Support for the re-use of rural buildings as set out in the policy
2. The policy should refer to sites within the AONB
3. Concerns that the final paragraph of the policy regarding exploring other uses before permitting residential use does not reflect national policy and subsequently makes the policy unsound
4. Concern regarding the use of the word 'enhance'.

**The Chilterns Conservation Board** requested that the policy refer to the AONB in criteria (iv)

**Historic England** would welcome a specific criterion requiring the retention of any features of architectural or historic interest.

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

There is no need to refer to the AONB in this policy. The protection of these areas is set out in national policy and at policies STRAT1 and ENV1 in the emerging Local Plan. It does not need to be repeated.

The word 'enhance' is used frequently in planning policy, including the National Planning Policy Framework. We are required to use positive language in planning policies and the word 'enhance' has been used regularly to replace words such as 'sympathetic', which are considered to be less positive and risk restricting contemporary design solutions from coming forward.

We agree that the final paragraph of this policy may not be compliant with the National Planning Policy Framework and we look to amend or delete this requirement so that it is compliant with national policy.

**Policy/paragraph wording changes will be made as follows:**

We have revised the policy to ensure it is consistent with national policy.

## **Town centres and retailing**

Overall 47 people commented on this chapter:

- Support 17
- Comment 14
- Object 16

### **Policy TC1: Retail and town and larger village centres**

Overall 18 people commented on this policy:

- Support 5
- Comment 8
- Object 5

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

1. Oppose requirement for an impact assessment to be submitted with proposals of more than 500 sq. m on sites outside town centres
2. Support retention of the existing town centre boundaries and designated primary retail frontages
3. Account should be taken of designated areas in Neighbourhood Development Plan policies for centres
4. More shops and facilities should be built where the large housing developments are
5. Policy does not recognise that all larger villages are not the same
6. Wallingford needs a second supermarket to provide consumer choice
7. Chalgrove village already has sufficient retail facilities. Expanding Chalgrove significantly by creating a new town on the airfield would result in increased competition in a relatively small catchment area, leading to the loss of current retail facilities and a less active and vibrant service centre.
8. Large out of town shopping centres should not be permitted
9. Not aware of Didcot being a tourist attraction unlike Henley, Thame and Wallingford because they are historic. Perhaps make the wording more precise.

**Historic England** welcome the Council's intention, as set out in Policy TC1, of reinforcing the local distinctiveness of the towns in the district and improving their vitality and viability. Additional development or redevelopment in historic town centres should conserve and enhance their historic environment. Opportunities should be sought to support the economic viability of these town centres and/or bring heritage assets back into viable use through new development.

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

The Retail and Leisure Needs Assessment published in 2016 identified that the market town centres in the district are relatively small, and therefore could potentially be adversely affected by out-of-centre development. The NPPF does indicate that a lower threshold can be set when requiring an impact statement for proposals outside of town centres instead of the default threshold (2,500 sq. m) if it is felt to be necessary. It is recognised that not all villages are the same and development proposals will be assessed by the Plan as a whole.

**Policy/paragraph wording changes will be made as follows:**

Policy TC1 will be amended to make a distinction between the towns and larger villages.

A criteria will be added to policy TC1 to address car parking and public transport in the towns to support retail.

The conservation and enhancement of the towns' heritage assets are covered in policies HEN1, TH1 and WAL1.

Specific retail requirements to support the strategic sites will be set out in the policies for these sites (STRAT7, STRAT8, STRAT9 and STRAT10).

**Policy TC2: Amount and location of new retail floorspace**

Overall 4 people commented on this policy:

- Support 2
- Comment 0
- Object 2

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

1. Thame Retail Study and Impact Assessment dated November 2015 and prepared by Carter Jonas on behalf of Thame Town Council should be a material consideration and referenced
2. The Carter Jonas Study indicates that local opposition regarding suitability of a food store on the Cattle Market site has not changed. The assessment identifies that a foodstore of the scale identified located outside of the Town Centre would only have a small impact.
3. Account should be taken of designated areas in Neighbourhood Development Plan policies for centres

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

The council have commissioned GVA to update the Retail and Leisure Needs Assessment and the Policy will be based on the most up to date evidence available. This assessment is a shared piece of evidence that should also be used by neighbourhood planning groups to help in the preparation of their plans.

**Policy/paragraph wording changes will be made as follows:**

The tables in Policy TC2 and paragraph 10.10 will be updated in line with the evidence from the latest retail study.

**Policy TC3: Retailing in Henley**

Overall 3 people commented on this policy:

- Support 2
- Comment 0
- Object 1

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

1. Object to a new foodstore unless it occupies an existing building
2. Agree that applications for new comparison goods floorspace outside Henley town centre should be resisted and be required to demonstrate

compliance with the sequential test and a locally set retail impact threshold (500 sq. m)

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

An application for a new foodstore would have to comply with other relevant policies in the Plan and each application is treated on individual merits. The Retail and Leisure Needs Assessment published in 2016 identified that the market town centres in the district are relatively small, and therefore could potentially be adversely affected by out-of-centre development. The NPPF does indicate that a lower threshold can be set when requiring an impact statement for proposals outside of town centres instead of the default threshold (2,500 sq. m) if it is felt to be necessary, therefore a local threshold of 500 sq. m has been set.

### **Policy/paragraph wording changes will be made as follows:**

Policy TC3 will be incorporated into policy TC2.

### **Policy TC4: Retailing in Thame**

Overall 10 people commented on this policy:

- Support 4
- Comment 2
- Object 4

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

1. A small-median convenience/ foodstore up to 1,500 sq. m net will not be adequate given the amount of additional housing that is proposed.
2. Also need to also take account of the major new housing developments planned by Bucks County Council in areas which will closely border onto Thame in Oxfordshire, since these inhabitants will shop in their nearest Town - namely Thame.
3. Allow Neighbourhood Development Plans to allocate convenience / foodstore
4. Concerned that there is currently not enough parking spaces to support retail centres. This will only get worse with all of the development that is planned.
5. Unnecessary for the Local Plan to recommend that the Cattle Market site is reconsidered for a foodstore as part of the Neighbourhood Plan update. There would be a requirement to consider the Cattle Market site as part of a sequential assessment under the terms of Policy TM1.
6. Reword paragraph 10.14 – a review of the Neighbourhood Plan should consider the allocation of the Cattle Market site or other town centre sites in order to deliver a smaller format convenience store at an appropriate location in the town.

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

The Retail and Leisure Needs Assessment is currently being updated and the most up to date evidence will be included in the Plan, including the convenience floorspace requirement for Thame. This evidence is a shared evidence base which the neighbourhood planning groups should also be using to inform their

plan. It is expected that the policy in the Thame Neighbourhood Plan to exclude the use of the Cattle Market site for a food store should be reviewed, especially as the emerging evidence suggests that Thame is in need of a new small-median foodstore to be located within the town centre.

Policy TC1 will include reference to car parking and public transport improvements to support retail in the towns.

**Policy/paragraph wording changes will be made as follows:**

Policy TC4 will be incorporated in to policy TC2. Paragraph 10.14 will be amended to indicate that the Neighbourhood Development Plan should consider the Cattle Market or other town centre sites to deliver a convenience store at an appropriate location in the town centre.

Policy TC2 makes it clear that foodstores are expected to be delivered through neighbourhood plans.

**Policy TC5: Retailing in Wallingford**

Overall 5 people commented on this policy:

- Support 2
- Comment 2
- Object 1

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

1. Former Waitrose site has planning permission and is already being redeveloped. Policy TC5 is therefore out of date.
2. Support development of additional retail space in Wallingford but consider that the Policy is too restrictive insofar as it is reliant on proposals coming forward through the NDP.
3. Wording of Policy should be revised such that retail development in Wallingford is not solely dependent on the adoption of the NDP, which could be subject to delay.

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

The council supports the allocation of additional retail provision being delivered through the Neighbourhood Plan but is aware that Policy TC5 needs to contain a contingency within it should the Wallingford Neighbourhood Plan not come forward in a timely manner. This should ensure that the appropriate amount of retail development can still be delivered.

**Policy/paragraph wording changes will be made as follows:**

All reference to the "former Waitrose site" will be removed from Policy TC5 and paragraph 10.15 will be updated as the Lupton Road permission has lapsed. Policy TC5 will be incorporated into policy TC2.

**Policy TC6: Primary Retail frontages**

Overall 4 people commented on this policy:

- Support 2
- Comment 2

- Object 3

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

1. Retail and Leisure Needs Assessment concentrates on the local market towns. There is little focus and subsequently no evidence for the council to define primary frontages in the larger villages.
2. Ensure that a one size fits all approach is not adopted. Views of the NDPs in relation to local and strategic sites, and the mix of use, must be heard and given due consideration.

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

The Retail and Leisure Needs Assessment does focus on Didcot and the market town centres as this is where a significant amount of retail provision will be directed. The council agrees that a one size fits all approach is not appropriate and that larger villages can identify primary (and secondary) frontages if they wish to and have the evidence to do so.

**Policy/paragraph wording changes will be made as follows:**

Reference will be removed to villages identifying shopping frontages. This does not prevent neighbourhood plans from doing so if they have the relevant evidence.

## **Community and recreational facilities**

Overall 56 people commented on this chapter:

- Support 29
- Comment 20
- Object 7

### **Policy CF1: Safeguarding Community Facilities**

Overall 12 people commented on this policy:

- Support 7
- Comment 3
- Object 2

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

7. Support for the retention of community facilities
8. Strengthen policy to require new residential development to provide or contribute towards new community facilities
9. Strengthen wording 'locality'
10. Alternative site should be accessible in terms of pedestrian and cycle links and parking provision
11. The policy should include the retention and protection of Public Rights of Way, equestrian routes and indoor sports facilities
12. The policy should define community facility. It would be unreasonable to include private facilities.

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

Infrastructure funding, including money to provide and improve community facilities, is collected from developers through the Community Infrastructure Levy. On larger development schemes it can be secured through a Section 106 legal agreement. The requirement for new development to provide appropriate infrastructure is set out at Policy INF1. The Local Leisure Strategy will identify where there is a need for improvements to and/or new local facilities such as community and village halls. A separate policy is not required.

We acknowledge that the term 'locality' could be strengthened and that any replacement facility should be comparatively accessible. We will amend the policy to reflect this.

We acknowledge that the plan lacks a policy to protect existing public rights of way, including equestrian routes, and will be addressing this. Policies CF4 and CF5 seek to protect, maintain and enhance existing sports facilities and requires new development to provide them or contribute towards their delivery. This includes indoor sports facilities.

A definition of what we considered to be an essential community facility is set out in the final paragraph of the policy. As there are a wide variety of community facilities and services it would not be practical to try and identify each and every one. Paragraph 11.1 lists examples of these facilities and services but the list is not and can not be exhaustive.

**Policy/paragraph wording changes will be made as follows:**



- Amend first bullet to read “it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities.”
- Add policy to retain and protect public rights of way

### **Policy CF2: Provision of Community Facilities and Services**

Overall 8 people commented on this policy:

- Support 5
- Comment 2
- Object 1

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

- Support for the provision of community facilities and services
- The policy should refer to Neighbourhood Development Plans
- The local community should be involved in the planning of new facilities and services to ensure that they reflect their needs

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

We agree that all new development should also meet the policies set out in made neighbourhood development plans. Made neighbourhood development plans form part of the district’s development plan. Planning legislation requires development to be in accordance with the development plan unless material consideration indicate otherwise. In response to this consultation we will be highlighting this requirement in policy STRAT1. Subsequently it does not need to be repeated within the policy.

A number of opportunities are provided to local communities to be involved in the planning of new facilities and services. The Local Leisure Strategy that looks at the provision of community/village halls includes consultation with the Parish Council to ensure that the information we hold on the use and condition of community/village halls is up to date. Parish Councils are also consulted on planning applications and the Council will work with them to ensure that any new or improved facilities and services meet their needs.

### **Policy/paragraph wording changes will be made as follows:**

No specific changes to this policy arising from responses to the consultation.

### **Policy CF3: New Open Space, Sport and Recreation facilities**

Overall 11 people commented on this policy:

- Support 6
- Comment 5
- Object

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

- Support for the provision of open space, sport and recreation facilities
- Add principles encouraging active lifestyles and tackling obesity
- Refer to Neighbourhood Development Plans
- Encourage facilities to be built in accordance with Sport England Guidance

- Concerns regarding impact of floodlighting and additional buildings and parking
- Include similar policy to saved Policy R5 – Golf courses and driving ranges
- Existing deficits need to be addressed

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

We recognise that there is limited reference to health and wellbeing within the plan and will be undertaking a Health Impact Assessment to ensure that these issues, such as encouraging active lifestyles and tackling obesity, have been addressed.

We agree that encouraging facilities to be built in accordance with Sport England Guidance would be positive and will add this to the supporting text.

Policy ENV13 requires the adverse impact of artificial light to be considered when determining applications for planning permission. This would include floodlighting. The design of related buildings would need to meet the design policies set out in the local plan and the objectives and principles set out in the South Oxfordshire Design Guide. Policy TRANS5 requires proposals to meet Oxfordshire County Council parking standards.

The Leisure Strategy takes account of existing deficiencies.

### **Policy/paragraph wording changes will be made as follows:**

No specific changes to this policy arising from responses to the consultation.

### **Policy CF4: Existing Open Space, Sport and Recreation Facilities**

Overall 11 people commented on this policy:

- Support 5
- Comment 4
- Object 2

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

1. Support for protecting existing open space, sport and recreation facilities
2. Add principles encouraging active lifestyles and tackling obesity
3. Existing deficits should be addressed

**Sport England** recommended that bullet point (ii) of the policy is deleted and the text from the NPPF paragraph 74 is used which is clearer or the Sport England Playing Fields policy. They highlighted the importance of publishing the evidence base for sport so that the findings can be included in the Local Plan, including the policies for the main settlements. Sport England also recommended amending bullet point (iii) to reflect the text used in paragraph 74 of the NPPF.

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

We recognise that there is limited reference to health and wellbeing within the plan and will be undertaking a Health Impact Assessment to ensure that these issues, such as encouraging active lifestyles and tackling obesity, have been addressed.

The Leisure Strategy takes account of existing deficiencies.

**Policy/paragraph wording changes will be made as follows:**

- Amend bullet point (ii) to read “the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”
- Amend bullet point (iii) to read “an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements.”

**Policy CF5: Open Space, Sport and Recreation in new residential development**

Overall 14 people commented on this policy:

- Support 6
- Comment 6
- Object 2

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

- Support the requirement for new development to provide or contribute towards open space, sport and recreation
- Add principles encouraging active lifestyles and tackling obesity
- Existing deficits should be addressed
- The policy should encourage the provision of woodland as accessible public open space
- Concerns regarding impact of floodlighting and additional buildings and parking

**Sport England** supports the Councils intention to provide new open space, sport and recreation facilities. They have concerns regarding a standard based approach and whether it would meet the test set out in CIL Regulation 122. They advise that the Council to continue preparing a robust evidence base which includes appropriate prioritised projects which can meet the needs generated by new developments in the area. Without this level of evidence, they consider that the standards by themselves will not be able to inform the identification of projects, or justify them in the context of demonstrating that the CIL Regulation 122 tests have been met.

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

We recognise that there is limited reference to health and wellbeing within the plan and will be undertaking a Health Impact Assessment to ensure that these issues, such as encouraging active lifestyles and tackling obesity, have been addressed.

The Leisure Strategy takes account of existing deficiencies.

We agree that woodlands provide a unique and beneficial type of open space. All types of open space are included within the requirement set out in this policy. However, it would be good to clarify this within the supporting text and encourage their maintenance, protection and provision.

**Policy/paragraph wording changes will be made as follows:**

No specific changes to this policy arising from responses to the consultation.

## Monitoring and Review

There were eight comments on this chapter. These have all been reviewed and the following key themes identified. The council's response to the main themes is below.

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

2. Monitoring the effect of development on the way of life in rural communities
3. Use, maintenance & effectiveness of SuDS
4. The inclusion of windfall sites
5. Renewable & low carbon energy usage with reference to DES 9

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

1. We have considered this suggestion and have searched for national indicators for the effects of development on the way of life in rural communities, but have been unable to find any. The cause and effect of monitoring this is unclear, as it is subjective, but other indicators cover the possible effects of development. These are as follows:
  - a. Meet identified housing need
  - b. Affordable housing completions
  - c. Economically inactive persons aged 16-64
  - d. Number of homes provided with fibre broadband
  - e. Number of Air Quality Management Areas
  - f. Number of essential community facilities lost or gained through the development process
  - g. Access to green space
  - h. Change in areas of UK41 priority habitats
  - i. Change in number of UK41 priority species
  - j. Distribution and status of farmland birds
  - k. New developments incorporating Sustainable Drainage Systems (SuDS)

### **Policy/paragraph wording changes will be made as follows:**

No changes made as there is no specific indicator for the effects of development on the way of life in rural communities.

2. The use, maintenance and effectiveness of Sustainable Urban Drainage (SuDS) is covered in indicator 8, Climate Change, but no target is set as there are no national ones, SuDS being a non-statutory requirement. The technical standards issued by the Department for Environment, Food and Rural Affairs, '*Non-statutory technical standards for sustainable drainage systems*' March 2015 will be applied as part of Building Regulations.

### **Policy/paragraph wording changes will be made as follows:**

#### 8.2 Climate change:

Indicator:

Target for new developments incorporating Sustainable Drainage Systems (SuDS) development

Existing target: No target but monitoring progress

Change to:

Target: No target, but monitoring against the Department for Environment, Food and Rural Affairs '*Non-statutory technical standards for sustainable drainage systems*' March 2015.

3. Windfalls and NDP sites in smaller villages should be reported as separate rows.

There is currently no policy that differentiates windfall sites from other sites as there is no windfall allowance. However, these can be monitored as part of the monitoring and review indicators.

C2 Care Homes are also not currently monitored. They have now been added as an indicator.

**Policy/paragraph wording changes will be made as follows:**

Additional housing indicators as follows:

Indicator	Target	Source	Period
Strategic allocations (Local Plan)	To deliver against 5 Year Housing Land Supply Target	Annual housing monitoring	Annually
Towns-allocations (NDP)	To deliver against the NDP allocation	Annual housing monitoring	Annually
Larger Villages (NDP)	To deliver against the NDP allocation	Annual housing monitoring	Annually
Smaller villages (NDP)	To deliver against the NDP allocation	Annual housing monitoring	Annually
Smaller villages - windfalls		Annual housing monitoring	Annually
C2 Care Homes		Annual housing monitoring	Annually

4. Watlington Parish Council rightly identified that the monitoring indicator for the energy demand from major sites derived from decentralised, renewable or low carbon sources should be 15% as stated in policy DES9 and in accordance with the target set by the Government.

**Policy/paragraph wording changes will be made as follows:**

**Climate Change 8.2**

Indicator: 10% of energy demand from major sites derived from decentralised, renewable or low carbon sources

Change to:

15% of energy demand from major sites derived from decentralised, renewable or low carbon sources

## Glossary

There were only five comments on the Glossary. All comments have been considered and the key themes and the council's response to them is below:  
The following key themes were identified in response to this policy:

1. The definition of AONB Management Plan is not accurate
2. The definition of Employment site needs to be made clearer

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

1. The existing definition of Area of Outstanding Natural Beauty Management Plan does not refer to the Chilterns AONB Management Plan. This needs to be added.
  - a. The definition of Major Development does not state that the definition for major development in the AONB is different (ref NPPF para 116)
2. The definition of Employment site would be made clearer if it referred to 'land' rather than 'site' and stated that the defined boundaries should be as designated by the Local Plan or Neighbourhood Plan

### Policy/paragraph wording changes will be made as follows:

1. The definition of Area of Outstanding Natural Beauty Management Plan will be amended to read:

The Area of Outstanding Natural Beauty Management Plans for the Chilterns and the North Wessex Downs contain comprehensive summaries of the key issues facing the areas and the management policies and actions needed to conserve the areas. For more information on the plans, please visit [www.chilternsaonb.org/conservation-board/management-plan](http://www.chilternsaonb.org/conservation-board/management-plan) or [www.northwessexdowns.org.uk/About-us/aonb-management-plan.html](http://www.northwessexdowns.org.uk/About-us/aonb-management-plan.html)

- a. The definition of Major Development to be amended to refer to the definition for major development in the AONB as follows:

Market Towns are defined as settlements that have the ability to support the most sustainable patterns of living within South Oxfordshire through their current levels of facilities, services and employment opportunities.

The definition for major development in the AONB differs. Please refer to NPPF paragraph 116.

2. The definition of Employment site will be changed to read:

#### **Employment Land**

A designation that has defined boundaries and is used to safeguard areas in the District for employment uses, both existing and proposed, as designated by the Local Plan or a Neighbourhood Plan