

Response to the Initial Questions (IQs)

Joint Local Plan



Introduction

This paper provides South Oxfordshire and Vale of White Horse District Councils' (the Councils') response to the Inspectors' Preliminary Matters and Initial Questions ([examination library reference ID01](#)) that was published on 5 February 2025.

In support of these responses, we have provided the following:

- Appendix 1 – Table of Engagement;
- Appendix 2 – Evidence of Engagement;
- Appendix 3 – Table of South and Vales' engagement on the withdrawn Oxford Local Plan 2040; and
- Appendix 4 – Evidence of South and Vales' engagement on the withdrawn Oxford Local Plan 2040

We ask if the Inspectors would like either of the following two documents referred to in our responses added to the Examination Library:

- Cherwell's Interim Duty to Cooperate Statement December 2024:
<https://www.cherwell.gov.uk/downloads/file/16062/interim-duty-to-cooperate-statement-december-2024>
- The Secretary of State for Housing, Communities and Local Government decision on granting planning permission for the "HIF1" infrastructure scheme:
https://assets.publishing.service.gov.uk/media/6759aec74cbda57cacd346ed/241211_A34_Combined_DL_IR_RtC.pdf

IQ1 What is the status of policies/allocations “carried forward”? Are these Saved policies? Are they allocated/to be examined as part of this Plan? How are they shown on the Policies Map?

- IQ1.1. Paragraph 1.12 of the Joint Local Plan explains that when it is adopted it will replace the previous local plans for Vale of White Horse and South Oxfordshire. No policies of those local plans are therefore ‘saved’. However, the Joint Local Plan does carry forward some of those earlier policies by incorporating them as policies of the Joint Local Plan via Policy HOU2(3) and their inclusion in Appendix 5 of the Joint Local Plan. All such policies are therefore to be examined as part of the Joint Local Plan.
- IQ1.2. As noted in Site Selection Topic Paper, [examination library reference TOP07.1](#), we have reviewed all the existing local plan allocated sites, and categorised them into three types. Firstly, those that have finished construction and thus do not need any policy allocation. Secondly, those with planning permission that have not finished construction. Thirdly, those without planning permission.
- IQ1.3. Carried forward sites are those in the second category: sites with planning permission but have not finished construction. Paragraphs 2.7-2.8 of TOP07.1 states the following regarding these sites:
- 2.7 *23 of the sites that our current local plans allocated have some sort of planning permission. While most of these sites are still under construction, and some are yet to start construction, we will need to carry forward the original policy and present these in Appendix 5 to the Joint Local Plan. For the sites with all the relevant planning permissions, this is in case the applicant submits new or varied plans. For the other sites, we will need to retain the policy to determine reserved matters applications (the detailed applications that follow outline consent). This will mean that the councils can still use the previous allocation policy, upon which the developer secured their outline permission, to determine these reserved matters applications.*
- 2.8 *The principle of development on these sites has been advanced through planning permission, but in most instances the previous policy is still needed to help guide the determination of reserved matters / discharge of condition applications. Furthermore, changes to these policies could have had a disruptive effect on developers securing these detailed consents / discharging conditions. The councils therefore decided to carry forward these existing policies into Appendix 5 of the plan.*

- IQ1.4. In our previous local plans existing allocations with planning permissions such as these have been called ‘saved’ allocations, but that concept was strictly concerned with the transitional arrangements when the plan-making procedures of the Planning & Compulsory Purchase Act 2004 were first brought into effect and is no longer applicable. Instead, the policies for these sites have been incorporated into the new local plan rather than having the original plan and policy not being superseded. Therefore, we consider the term “carried forward” to be more appropriate, where we seek to retain allocation policies. It is not our intention to save elements of existing local plans, such that they stay as part of the Development Plan for the area, rather that the Joint Local Plan replaces them in full.
- IQ1.5. The carried forward sites are intended to be retained as allocations in the Joint Local Plan and appear in Appendix 5 of the Plan. In reporting the residential sites with planning permission in policy HOU2 Sources of Supply, they are individually identified in part (3) and recorded as commitments.
- IQ1.6. We will be updating our housing land supply statements in April when the new monitoring year begins. As part of this, we will update the examination on progress on sites, as some may have moved on.
- IQ1.7. Policy JT1 Meeting Employment Needs, details the carried forward employment sites, with one policy presented in Appendix 5 of the plan.
- IQ1.8. We have proposed two modifications to the Joint Local Plan (MM10 and AM13 in the Schedule of Proposed Modifications, [examination library reference CSD01.1](#)) to clarify that the contents of Appendix 5 are policies. We have also proposed modifications to update that one site that has completed construction (MM06 and PM01).
- IQ1.9. These sites appear on the policies map as carried forward allocations.
- IQ1.10. Those existing residential allocated sites with no planning permission, that we consider suitable for allocation (see [examination library reference TOP07.1](#) Site Selection Topic Paper, for our assessment of sites and alternatives), are allocated in Chapter 8 of the JLP.

IQ2 The submission documents list includes a Schedule of Proposed Modifications (CSD01.1). Can the Councils confirm that these have not been subject to any consultation to date? If that is the case, the Examination will be based upon the Submission version of the Plan with due regard given to the Councils' proposed schedule as a supporting document. If there has been some public consultation, please confirm the dates of the consultation

IQ2.1. The proposed modifications dated December 2024 ([examination library reference CSD01.1](#)) have not been subject to any consultation to date. They represent proposed corrections and changes arising from representations received at the Regulation 19 stage, together with other updates. Our intention, with the Inspectors' approval and recommendations, is to consult on the main and additional modifications later in the examination process, once the schedule has been added to and finalised.

IQ3 Is the Policies Map collectively formed by CSD02.1 Emerging Policies Map – Vale of White Horse (PDF) (Publication Version); CSD02.2 Emerging Policies Map – South Oxfordshire (PDF) (Publication Version) and CSD02.3 Emerging Policies Map Booklet (Publication Version)?

IQ3.1. That is correct.

IQ3.2. We have proposed some modifications to the emerging policies map in the schedule of modifications ([examination library reference CSD01.1](#), see pages 14-15).

IQ4 The DtC Statement (CSD09.01) refers to separate SoCG being submitted with adjoining authorities in addition to the joint SoCG between the Oxfordshire authorities (DUC01). Can the Councils provide a timeframe for the submission of these SoCGs?

IQ4.1. There are three outstanding SoCGs with neighbouring authorities. These are bilateral statements with Cherwell District Council, Oxford City Council and West Oxfordshire District Council.

IQ4.2. Subject to the other parties' agreement, we are aiming to submit these as examination documents by the end of March 2025, and certainly before the hearings commence.

IQ5 Are there any other SoCGs anticipated? If so, with whom and when can these be expected to be submitted?

- IQ5.1. There are 15 further SoCGs anticipated between the Councils and key site promoters. We are aiming to submit these by the end of March 2025.
- IQ5.2. There are two further SoCG anticipated with prescribed bodies. The Integrated Care Board SoCG is planned for submission by the end of March 2025. The SoCG with the Environment Agency is dependent on the completion of the Water Cycle Study detailed assessment (expected March 2025), therefore it may be necessary to submit this SoCG in April 2025, before hearings commence.
- IQ5.3. One further SoCG is anticipated with Thames Water. They are not a prescribed body, but Thames Water is a critical infrastructure provider for the sites coming forward within the JLP. This SoCG is also reliant on the completion of the Water Cycle Study, so it may be necessary to submit this in April 2025.

IQ6 Are there any other SoCGs expected with the prescribed bodies? for example, a SoCG with the Environment Agency?

- IQ6.1. Yes, please see the answer above to IQ5 above.

IQ7 Can the Councils provide the evidence of continuous engagement with the prescribed bodies?

- IQ7.1. As a prelude to our responses to IQ7 and to the related IQs concerning the Duty to Co-operate, it is important to distinguish between (a) the legal requirements of that Duty and (b) the evidence of engagement undertaken by the Councils (as a matter of fact) with prescribed bodies (and with local planning authorities). This distinction is addressed in our response to IQ8. We have presented an extensive record of our continuous engagement throughout the development of the JLP in our Statement of Compliance with the Duty to Cooperate, [examination library reference CSD09.1](#). However, as explained at paragraph 2.1 of CSD09.1, it should not be assumed that simply because there has been engagement on an issue that issue is therefore something that amounts to a strategic matter which is subject to the legal requirements of the Duty to Co-operate.
- IQ7.2. Continuous engagement is also demonstrated with through the SoCGs. Where any Prescribed Body has relevant interests in the scope of the JLP, there are SoCG either already submitted ([examination library references](#)

DUC01 - DUC 09) or scheduled for submission (please see the answer above to IQ5).

- IQ7.3. Prescribed Bodies' representations have also been received throughout the JLP process, with the contents of those representations detailing their support, their soundness concerns and sometimes requested modifications, having shaped the JLP. These representations and the actions taken to resolve concerns demonstrate the necessary engagement to engage constructively, actively and on an ongoing basis, even where the subject matter does not amount to a strategic matter which falls within the scope of the Duty to Co-operate.

IQ8 The DtC Statement (CSD09.1) dated December 2024 was submitted for examination with the Plan. It identifies the Duty to Cooperate bodies and the strategic planning matters upon which engagement should take place. Have all of the strategic planning matters been identified?

- IQ8.1. Yes. The identified matters are things with potential to give rise to strategic matters, but are not necessarily strategic matters meeting the statutory definition in section 33A(4)(a) and (b) PCPA 2004. The Statement of Compliance with the Duty to Co-operate, [examination library reference CSD09.1](#) explains this at paragraphs 1.16 and 1.19.
- IQ8.2. To elaborate further, section 33A(1) PCPA 2004 imposes the Duty to Co-operate only when the *“activities within subsection (3) are undertaken”*. Those activities within section 33A(3) PCPA 2004 include *“(a) the preparation of development plan documents, ... (d) activities that can reasonably be considered to prepare the way for activities within [paragraph (a)] that are or could be contemplated, and (e) activities that support activities within [paragraph (a)],... so far as relating to a strategic matter”*. Thus, not all activities involved in the preparation of a local plan fall within the scope of the Duty to Co-operate, but only those activities *“so far as”* they relate to *“a strategic matter”*.
- IQ8.3. The meaning of *“a strategic matter”* is set out in section 33A(4) PCPA 2004 and is as follows:

“For the purposes of subsection (3), each of the following is a “strategic matter” –

- (a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and*

- (b) *sustainable development or use of land in a two-tier area if the development or use –*
- (i) *is a county matter, or*
 - (ii) *has or would have a significant impact on a county matter.”*

- IQ8.4. The Joint Local Plan does not propose any development which concerns any “*county matter*” (for this purpose meaning minerals development and minerals-related development), and so in order to identify any “*strategic matters*” that would fall within the scope of the Duty to Co-operate, it is necessary to consider whether any aspects of the Joint Local Plan relate to any development or use of land that has or would have “*a significant impact on at least two planning areas*”. This question has both a spatial dimension (the need for any impact to be experienced not simply within a single planning area but within two (or more) planning areas) and a magnitude dimension (the need for any impact to be “*a significant impact*”).
- IQ8.5. Both dimensions will involve matters of evaluative planning judgment, which in the first instance will be made by the plan-making body. Consideration needs to be given both to what the plan in question proposes and also to what it does not propose (or fails to address), in the light of the available evidence base. As preparation of a plan progresses, matters with the potential to give rise to “*strategic matters*” might fall away, as the evidence is gathered, which shows that what the plan proposes (or does not propose) will not result in any “*significant impact*” on two (or more) planning areas, or the converse may apply and matters which were not “*strategic matters*” initially may become so, if the evidence gathered shows that how they are dealt with (or not dealt with) by the plan would give rise to such impacts. The strategic matters are not prescribed, and different planning authorities will have different specific strategic planning matters relative to their issues in their area. We believe all relevant potential strategic planning matters are set out within the Duty to Cooperate statement of compliance, [examination library reference CSD09.1](#) at paragraph 1.20.
- IQ8.6. A representation from Oxford City Council was submitted at Regulation 19 stage suggesting that not all strategic planning matters have been identified. However, that representation does not explain which strategic planning matters are not included, and no earlier submissions from Oxford City Council expressed this concern.
- IQ8.7. We have undertaken rigorous checking and engagement on the strategic planning matters set out in the Duty to Cooperate Statement [examination library reference CSD09.1](#). We first identified and consulted upon some potential strategic matters during the first Joint Local Plan issues consultation stage (Regulation 18 Part 1, May 2022, [examination library](#)

[reference LPP08](#)). We reviewed the mixed feedback received and reflected on what edits to the strategic matters would be needed because of the Oxfordshire Plan ceasing preparation. The strategic matters that related to our anticipated Joint Local Plan's impacts were initially:

1. Addressing climate change;
2. Provision of infrastructure;
3. Conserving and enhancing our natural and historic environments;
4. Continuing to meet the existing agreed Unmet Need of Oxford City;
5. Joint evidence base.

The changes to the strategic matters to reflect the new scope of the JLP meant that they were edited to the following:

1. Housing need and supply, including affordable housing, and the provision of sites for Gypsies and Travellers;
2. The supply of retail and employment land;
3. The provision of infrastructure, including health, education, utilities, flood risk and strategic sustainable transport links;
4. Conserving and enhancing our natural and historic environments;
5. Addressing climate change;
6. Joint evidence base.

We then consulted upon these at the preferred options stage (Regulation 18 Part 2, January 2024, [examination library reference LPP01](#)), and these defined potential strategic matters to engage on for the purposes of the Duty to Cooperate have remained consistent since that time.

IQ9 Have the strategic planning matters identified in the Duty to Cooperate Scoping Document (LPP12) been carried forward to the DtC Statement (CSD09.1)?

- IQ9.1. Broadly the potential strategic matters cover the same issues. The potential strategic matters were refined between the Duty to Cooperate Scoping document stage and the next stage, as explained in paragraph IQ8.4 above.

IQ10 Can the Councils set out the structure and processes which they put in place to ensure that engagement continued following the decision to abandon the Oxfordshire Plan. It would be useful if this was produced in the form of a diagram setting out the various tiers of the hierarchy across which engagement took place, including at an officer and managerial level.

IQ10.1. As set out in the joint statement (see 03/08/2022 in [Appendix 1](#) and corresponding [023 Press Release](#) in Appendix 2, and para IQ13.1) issued in August 2022 by the leaders of the authorities following cessation of work on the Oxfordshire Plan, there was a clear commitment from all to transition to a process focused on Local Plans, address the issues of housing needs through individual Local Plans for each of the City and Districts, and cooperate with each other and with other key bodies during the preparation of those Local Plans.

IQ10.2. The next meeting of the Future Oxfordshire Partnership on 27 September 2022 (see 27/09/2022 in [Appendix 1](#) and corresponding [030 FOP papers](#) in Appendix 2) included a paper, item 5b, updating on the Oxfordshire Plan 2050 programme, confirming arrangements as follows:

- Local plans will need to cover the housing questions and other matters that would have been addressed through the Oxfordshire Plan. There is a requirement on the local planning authorities in preparing these Local Plans to satisfy the Duty to Cooperate.
- The decision to bring the Oxfordshire Plan work programme to an end does not affect the councils' commitment to delivery of the other aspects of the Housing and Growth Deal. There was a separate commitment to plan for and support the delivery of 100,000 new homes between 2011 and 2031. All of the City and District Councils have adopted plans in place which plan up to at least 2031 and these collectively plan for the necessary sites for Oxfordshire for the Housing and Growth Deal period.
- The Oxfordshire Strategic Vision, which was endorsed by the Partnership in March 2021 and approved by all of the Oxfordshire Councils, will continue to help guide the development of Local Plans and other strategic documents in Oxfordshire. Local Plans continue to provide an important vehicle for developing the spatial ambitions for the County linked to the Oxfordshire Strategic Vision.
- The Housing and Growth Deal also contained a commitment by the Oxfordshire authorities to implement and roll forward the Oxfordshire Infrastructure Strategy... Discussions between officers from the County Council and the City and Districts can explore how to closely integrate the next phase of work with Local Plans

IQ10.3. The 'next steps' section of the same FOP paper sets out a number of principles for joint working under the new local plan focussed approach:

- That we collectively seek to deliver the outcomes of the Oxfordshire Strategic Vision
- That we ensure a smooth transition from the Oxfordshire Plan back to Local Plans
- That we continue to satisfy the requirements of the Duty to Cooperate
- That we continue to work cooperatively and constructively in developing our respective Local Plans and other strategies, assisted by Statement(s) of Common Ground or memoranda of understanding where appropriate.
- That we continue to work together on the Oxfordshire Infrastructure Strategy.
- That the understanding achieved of countywide and district issues and priorities, are utilised, where appropriate, to support the preparation of these plans and strategies.
- That the benefits and learning gained by the Oxfordshire authorities, through their long history of joint working and collaboration on planning and infrastructure matters, continue to be valued in seeking to achieve both common and individual goals.

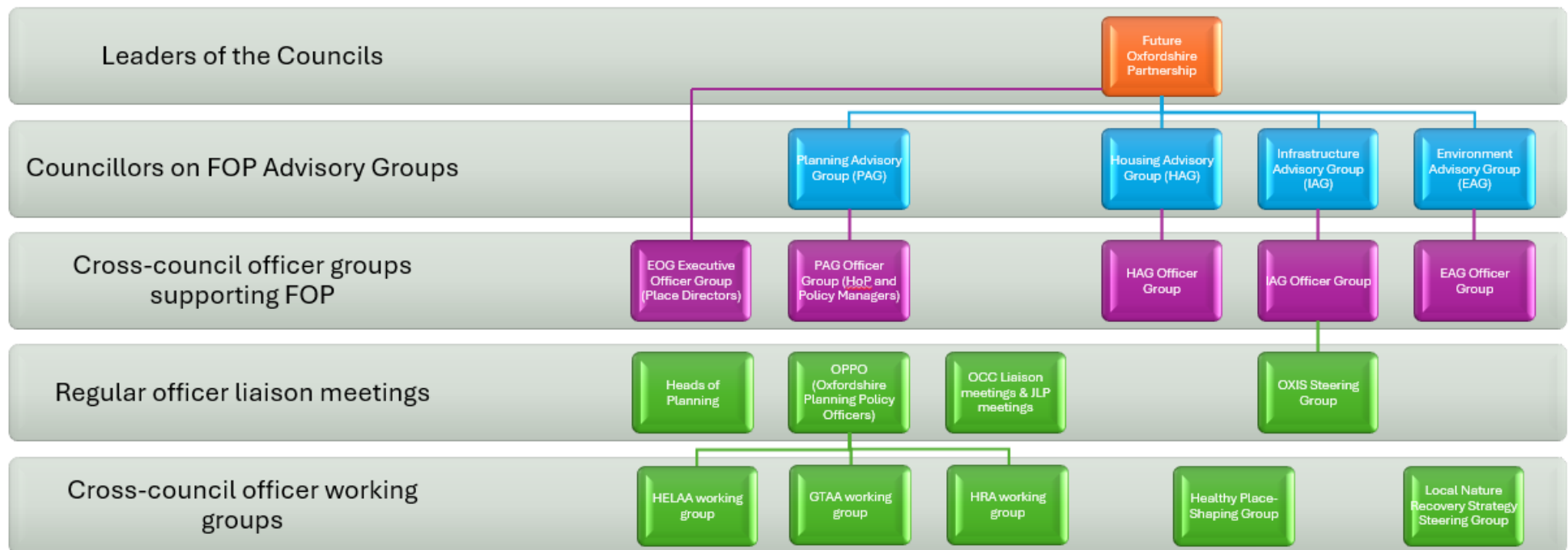
IQ10.4. The report went on to confirm that:

“17. To help retain good communication between the Councils on strategic planning matters it is proposed that the Oxfordshire Plan 2050 Advisory Group is renamed as the Planning Advisory Group and that its terms of reference are reviewed to set out a broader strategic remit around spatial planning. It would continue to report through to the Future Oxfordshire Partnership and be chaired by a member of the partnership. It would involve relevant Cabinet Members from the City and District Councils as local planning authorities, and from the County Council as the mineral planning authority, waste planning authority and key infrastructure provider. The group would be supported by respective Heads of Planning/Planning Policy Managers who would also attend meetings. This refreshed advisory group could be a useful forum for the Councils to update each other on their respective plans as they are prepared, and for discussion on strategic planning issues.

18. Officers from the Councils will continue to engage closely with each other as plans are prepared in order to satisfy the Duty to Cooperate. The terms of reference of the officer Heads of Planning meeting and the Oxfordshire Planning Policy Officers meeting will be reviewed and these meetings will continue to provide a forum for discussion and cooperation.

19. Although the Oxfordshire Plan project may have ceased, there has been a lot of background work that will continue to be of value to the planning authorities as they develop their local plans. A wrap up exercise is underway to address consultant contract and human resources matters and help from partners is appreciated on this.”
- IQ10.5. The FOP minutes from 27 September 2022 (see 27/09/2022 in [Appendix 1](#) and corresponding [030 FOP papers](#) in Appendix 2) also provide written responses to several public speakers, which restate the authorities’ commitment to continuing to work together and engage with each other on strategic planning issues. The Future Oxfordshire Partnership agreed at the meeting to retain an Advisory Group on Planning (PAG) involving relevant Cabinet Members from each of the County, City, and District Councils, as a useful forum for the Councils to update each other on their respective plans as they are prepared, and for discussion on strategic planning issues, thereby helping coordination and synchronisation.
- IQ10.6. The refreshed terms of reference for the FOP PAG are available at Appendix 2, [048 Terms of Reference](#) (Referred to in [Appendix 1](#) at 01/06/2023).
- IQ10.7. The diagram below shows the various tiers of the hierarchy across which engagement took place post the Oxfordshire Plan to keep strong collaboration on planning and infrastructure matters.

Structures for Cooperation post-Oxfordshire Plan



IQ11 The first three lines of the table in Section 3 refers to meetings held “at various dates throughout the JLP Plan preparation period 2021-2024” with all Oxfordshire Local Authorities; the Oxfordshire Growth Board; and Oxfordshire County Council. Can a more detailed list be provided of these meetings which took place during the course of Plan preparation including the information i-v set out above.

IQ11.1. Yes, these meetings are split out by date in the '[Appendix 1 - Table of Engagement](#)' attachment.

IQ11.2. We have presented a separate table which sets out the specific engagement we have had on the key stages of preparation of the withdrawn Oxford Local Plan 2040. This table is entitled [Appendix 3 - Table of South and Vales' engagement on the withdrawn Oxford Local Plan 2040](#).

IQ11.3. These three key regular meetings took place throughout the JLP plan preparation process:

- 1) Oxfordshire Growth Board/ Future Oxfordshire Partnership Planning Advisory Group (FOP PAG) (South, Vale, Cherwell, Oxford, West & Oxfordshire County Council)
- 2) Oxfordshire Planning Policy Officers (OPPO) (South, Vale, Cherwell, Oxford, West & Oxfordshire County Council)
- 3) Bilateral OCC liaison meetings (South & Vale with Oxfordshire County Council).

We have broken these down in the [Appendix 1 - Table of Engagement](#) and in the compilation of minutes/notes [Appendix 2 - Evidence of Engagement](#).

IQ11.4. We have focussed on providing the details for those meetings held after work ended on the Oxfordshire Plan, because cooperation between all the local authorities was self-evident in preparing a joint strategic plan between 2018 and 2022, involving seconded staff from the local authorities and a member steer through the FOP and its Advisory Group.

IQ11.5. The Oxfordshire Growth Board was renamed the Future Oxfordshire Partnership (FOP) in July 2021. The member advisory group called the Oxfordshire Growth Board Oxfordshire Plan 2050 Advisory Group was replaced by the Future Oxfordshire Partnership Planning Advisory Group in September 2022.

IQ12 A number of the entries included in the table in Section 3 relate to engagement on other Council's Plans. Can a separate table be provided relating to specific engagement on the Plan itself, including the evidence base, subdivided into topic areas, together with information i-v set out above.

IQ14.1. Yes, in preparing the [Appendix 1 - Table of Engagement](#) and the [Appendix 2 - Evidence of Engagement](#) we have focussed on only those meetings that relate to specific engagement on the Joint Local Plan itself, rather than our input to other authorities' emerging plans.

IQ14.2. We have also prepared a separate table setting out the specific engagement we have had on the key stages of preparation of the withdrawn Oxford Local Plan 2040. This table and evidence are entitled [Appendix 3 - Table of South and Vales' engagement on the withdrawn Oxford Local Plan 2040](#), and [Appendix 4 - Evidence of South and Vales' engagement on the withdrawn Oxford Local Plan 2040](#).

IQ13 The table at Section 3 of the DtC Statement (CSD09.01) sets out a summary of engagement undertaken in relation to the housing requirement, needs, unmet needs and supply. Early engagement (2021-2022) appeared to be centred around the now abandoned Oxford Growth Needs Assessment (OGNA), Oxford's emerging Local Plan and unmet need. However, no minutes of the meetings have been provided in terms of discussions surrounding the housing requirement and why the OGNA was abandoned. Can the information set out at i-v above be provided for those meetings.

IQ13.1. The [Appendix 1 - Table of Engagement](#) and related [Appendix 2 - Evidence of Engagement](#) include entries related to OGNA.

IQ13.2. Work on the Oxfordshire Plan 2050 ceased in August 2022, with a joint statement (see 03/08/2022 in [Appendix 1](#) and corresponding [023 Press Release](#) in Appendix 2) issued by the leaders of the authorities explaining that:

"The five Local Planning authorities in Oxfordshire have been working together on a joint plan for Oxfordshire to 2050. It is with regret that we were unable to reach agreement on the approach to planning for future housing needs within the framework of the Oxfordshire Plan.

Local Plans for the City and Districts will now provide the framework for the long term planning of Oxfordshire. The Oxfordshire Plan 2050 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing needs will now be addressed through individual Local Plans for each of the City and Districts. The

Councils will cooperate with each other and with other key bodies as they prepare their Local Plans.”

- IQ13.3. The background to this was that the Oxfordshire Plan was at Regulation 18 stage. It had already been through two rounds of Regulation 18 consultation, the latest in July-October 2021, with a further third Regulation 18 consultation on a preferred options plan programmed to take place between October-December 2022. The staffing for the Oxfordshire Plan was mainly drawn from the planning policy teams of the constituent authorities, with South and Vale having the largest number of staff seconded to the project (3 officers), plus a Strategic Programme Lead of the Oxfordshire Plan who was employed by Oxfordshire County Council.
- IQ13.4. Detailed work was progressing including on spatial options and housing needs. Consultants Icen, Cambridge Econometrics and JG Consulting had been appointed to prepare the Oxfordshire Growth Needs Assessment (OGNA). There was a divergence of views about the methodology and approach the OGNA consultants were taking to establish future housing needs. Officers and Councillors from South and Vale, among others, were concerned that the approach being taken to housing need in the OGNA that would have informed the housing requirements in the Oxfordshire Plan – was predicated on an inflated level of housing need (see for example the written feedback shared by South and Vale at 28/07/2022 in [Appendix 1](#) and corresponding [022 Email](#) in Appendix 2). In particular, there was concern that the potential housing need scenarios identified by the OGNA as an alternative to the standard method, were not in accordance Government policy and guidance, and were not justified on the evidence.
- IQ13.5. Over this period of later spring- summer 2022, Planning Policy Managers from the authorities met together with the Oxfordshire Plan manager weekly to make progress. These were ongoing collaboration meetings often centred on evidence base topics or plan-making processes. A seven step plan (see 08/07/2022 in [Appendix 1](#) and corresponding [020 Agenda and Notes](#) in Appendix 2) was sent to a Heads of Planning meeting in July 2022 to set out a plan for the next stages of work, including workshops before and after the OGNA results were due in late August 2022. Two of these workshops took place, but the five councils collectively took the decision in early August to cease work, so the third workshop did not happen.
- IQ13.6. The papers of the Future Oxfordshire Partnership on 27 September 2022 explain at Item 5b (see 27/09/2022 in [Appendix 1](#) and corresponding [030 FOP papers](#) in Appendix 2) the sequence of events as follows:
- “5. During 2022 there have been a sequence of discussions and workshops to try and identify a commonly accepted approach between the local planning authorities to the evidence base needed to inform

discussion on strategic housing issues. Unfortunately the local planning authorities were unable to reach agreement on the best approach to this. In the absence of an agreed approach to these central questions it was accepted that the Oxfordshire Plan programme will need to come to an end. Instead these issues will now be considered during the development of new Local Plans for the City and Districts.

6. Work on the Oxfordshire Plan was guided by input from the Oxfordshire Plan 2050 Advisory Group. This group included the relevant Cabinet Members from each of the Councils and provided a valuable forum to Page 28 discuss all aspects of the plan. While the group identified a wide range of issues on which there was common agreement it was not possible to reach an agreed approach on the evidence to inform strategic housing issues.”

- IQ13.7. Oxford City and Cherwell jointly re-appointed the same OGNA consultants Icen, Cambridge Econometrics and JG Consulting for their housing needs evidence, which became the Housing Employment Needs Assessment (HENA).
- IQ13.8. We objected to the HENA throughout Oxford and Cherwell’s formal Local Plan engagement processes. We were not invited to engage on the HENA preparation (see 09/09/2022 in [Appendix 1](#) and corresponding [028 Email](#) in Appendix 2). Ultimately, the Inspectors for the Oxford Local Plan examination found that we were justified with our concerns about the HENA not being a reliable evidence base. The PINS letter of conclusions of 11 September 2024 (see [examination library reference LNP05](#)) shows that the HENA evidence was finalised without engagement which did not meet the requirements of the duty to cooperate. They concluded that the methodological issues we had with the bias of the OGNA (later the HENA) assumptions, were in the Inspectors’ view substantiated, with “deliberate policy choices or at least clear objectives to be achieved” (paragraph 15) and “the use of this distribution option seems to us to be a deliberate policy choice/clear objective, which has a significant effect on the outcome of the assessment” (paragraph 17) being relevant conclusions.

IQ14 Can the Councils provide evidence of early and continuing engagement throughout the Plan process specifically on the preparation of the evidence base for housing needs and the requirement for the Plan (as opposed to other Council's plans) including the information set out at i-v. Whilst no unmet housing need has been identified, there may be other strategic or cross-boundary issues arising from the evidence base.

- IQ14.1. [Appendix 1 - Table of Engagement](#) summarises evidence of ongoing engagement on the strategic matters, including housing need and requirement. [Appendix 1 - Table of Engagement](#) includes information set out at i-v above, and Appendix 2 – Evidence of Engagement includes relevant notes, minutes and emails. The table includes entries which are only relevant to the JLP. The Statements of Common Ground with other authorities also provide evidence of the ongoing process. We have also prepared a separate table setting out the specific engagement we have had on the key stages of preparation of the withdrawn Oxford Local Plan 2040. This table is entitled '[Appendix 3 - Table of South and Vales' engagement on the withdrawn Oxford Local Plan 2040](#)'.
- IQ14.3. The JLP presents the Government's standard method as the housing need. The housing requirement meets the housing need for both South Oxfordshire and Vale of White Horse (as calculated in accordance with the standard method) and additionally includes the agreed and evidenced unmet housing need from Oxford. That approach has remained consistent throughout the JLP development at each stage of consultation.
- IQ14.4. After work stopped on the Oxfordshire Plan in August 2022, we considered that the OGNA process had demonstrated no exceptional circumstances existed to justify a departure from the standard method. We therefore commissioned ORS to undertake our own joint housing needs assessment (JHNA) to establish our specialist housing need. On 2 December 2022 (see 02/12/2022 in [Appendix 1](#) and corresponding [036 Email](#) in Appendix 2) we invited all other Oxfordshire authorities to participate in this commission, although none accepted.
- IQ14.5. On 6 January 2023 Cherwell and Oxford City Council advised us via email (see 06/01/2023 in [Appendix 1](#) and corresponding [039 Email](#) in Appendix 2) that had published a Housing and Economic Needs Assessment (HENA) prepared by Icen. We had not been invited to participate (see 09/09/2022 in [Appendix 1](#) and corresponding [028 Email](#) in Appendix 2) and were unaware that the study covered South and Vale until it was published.
- IQ14.6. Following our appointment of ORS, we invited all neighbouring local planning authorities and Oxfordshire County Council to attend a specialist housing needs workshop on 19 April 2023 (see 19/04/2023 in [Appendix 1](#)

and [046 Meeting Invitation and Minutes](#) in Appendix 2). At this workshop, we confirmed our intention to use government's standard method as the basis for our local housing need, as well as ORS setting out their proposed methodology for assessing specialist housing need.

IQ14.7. Our decision to use the standard method is the expected position set out in the NPPF and PPG. The decision to depart from it must be supported by evidence that shows there are exceptional circumstances for doing so. We explored this collaboratively with the other Oxfordshire authorities when preparing the Oxfordshire Plan. However, we were not aware of any technical evidence that justified this, neither in the OGNA, nor latterly the HENA. The OGNA had shown to us that:

- a. There were no fundamental failures of the standard method to reflect demographic changes over the plan period
- b. There were no realistic job-growth led projections that justified a departure from the standard method
- c. There was no realistic affordable housing led need that justified a departure from the standard method
- d. There was no agreement from the Oxfordshire authorities on a variety of other technical inputs / assumptions (for example on commuting rates / work from home allowances) that justified a departure.

IQ14.8. Since work stopped on the OGNA, our position on housing need has always been clearly and transparently set out in the standard method.

IQ14.9. Conversely, where other authorities decided to depart from the standard method, we have engaged positively on technical matters when we were invited to do so. It was important that we did so, as these matters were intrinsically linked to our own decision to pursue the standard method. Our engagement on these technical matters included:

- a) Providing comments to Oxford City Council's Local Plan 2040 preferred options consultation (September 2022) – submitted 18 November 2022 (see 18/11/2022 in [Appendix 3](#) and corresponding [entry 'A' Consultation Response](#) in Appendix 4).
- b) Providing comments to Oxford City Council's Local Plan 2040 housing need consultation (February 2023) – submitted 17 March 2023 (see 17/03/2023 in [Appendix 3](#) and corresponding [entry 'B' Consultation Response](#) in Appendix 4)
- c) Providing detailed comments in a meeting with Oxford City Council on the HENA and the associated justification for departing from the standard method (26 June 2023) (see 26/06/2023 in [Appendix 1](#) and corresponding [050 Minutes](#) in Appendix 2).

- d) Seeking feedback on the above comments at an Oxfordshire Planning Policy Officers (OPPO) meeting on 25 August 2023 (see 25/08/2023 in [Appendix 1](#) and corresponding [056 Email](#) in Appendix 2).
- e) An OPPO meeting on 5 September 2023 where Oxford City Council shared a note on their housing need, but did not provide us with any exceptional circumstances to justify a departure from the standard method (see 06/12/2024 in [Appendix 1](#) and corresponding [124 Email](#) in Appendix 2).
- f) A meeting between Cherwell District Council and South Oxfordshire and Vale of White Horse officers to explain further our criticism of the HENA and the associated justification for departing from the standard method (12 December 2023) (see 12/12/2023 in [Appendix 1](#)).
- g) Meeting with Oxford City Council on 19 December 2023 (see 19/12/2024 in [Appendix 1](#) and corresponding [074 Notes](#) in Appendix 2) where again our officers raised concerns with the technical assumptions made in the HENA
- h) In 21 December 2023 we responded to Oxford City Council's proposed submission (Regulation 19) consultation on their Local Plan 2040. This included detailed comments on the technical elements of the HENA. See 21/12/2023 in [Appendix 3](#) and corresponding [entry 'C' Consultation Response](#) in Appendix 4.

IQ14.10. There is no additional evidence base related to the development of the standard method for South Oxfordshire and Vale of White Horse, as this is a set methodology and the JLP was always proposing to meet the needs so identified in full.

IQ14.11. There is no new evidence base for meeting unmet need of Oxford because the agreed unmet need arose from the previous Strategic Housing Market Assessment 2014 and was then addressed within adopted plans in Oxfordshire. The JLP carried that approach forward. It was not until December 2023 that Oxford formally asked us to help meet their unmet need (see 19/12/2023 in [Appendix 1](#) and corresponding [074 Notes](#) in Appendix 2) but by that point the JLP preparation had assumed we would continue to do so as regards the agreed unmet need and we were not persuaded that Oxford had demonstrated any other unmet need.

IQ14.12. In 2025, the emerging Oxford City Local Plan 2042 is at an early stage of development. No progress has been made in establishing whether there will be any unmet needs or in establishing a revised figure for any unmet need. Whilst the formal withdrawal of the previous Oxford City Local Plan 2040 (in January 2025) took place after the JLP had been submitted for examination, it was apparent from a much earlier stage that there was a disagreement between South Oxfordshire and Vale of White Horse (on

the one hand) and Oxford (on the other hand) about how that plan had sought to identify unmet needs that would only realistically be resolved by the Oxford examination Inspectors, and it was clear from September 2024 onwards (when that plan's examination Inspectors concluded that it would need to be withdrawn) that that plan would not progress.

- IQ14.13. Oxford City Council appears to have agreed with neighbouring Cherwell District Council that there is currently no additional unmet housing need to accommodate. Cherwell's Interim Duty to Cooperate Statement December 2024¹, paragraph 4.13) states that *"We do not, however, consider that we need to accommodate additional housing need for Oxford in this Local Plan. At a meeting on 15th October 2024, under the Duty to Cooperate, Cherwell and Oxford City Council reached an understanding that the 4,400 dwellings would be brought forward to meet unmet need. No additional accommodation was requested at that meeting."* The figure of 4,400 dwellings is the amount of Oxford's unmet need that Cherwell had agreed to accommodate in the earlier round of plan-making which resulted in its adopted local plan. These 4,400 homes are from the "same round" of plan making as the unmet need in the currently adopted local plans in South Oxfordshire and Vale of White Horse. This statement indicates that Cherwell and Oxford's officers have an agreement that the same approach taken in our JLP to identifying agreed unmet need, remains appropriate and that no additional unmet need has been identified. On 5 December 2024 we emailed Oxford City Council to ask if they would agree the same for the JLP as with Cherwell, and they said that their position remained unchanged from their submitted representations (see 09/12/2024 in [Appendix 1](#) and corresponding [127 Email](#) in Appendix 2). We consider that a consistent approach to dealing with unmet need should be applied throughout Oxfordshire.

IQ15 Can the Councils provide evidence of engagement in relation to Oxford City's Unmet Housing Need and how the unmet need is met within the Plan?

- IQ15.1. In the early stages of the Joint Local Plan preparation, it was envisaged that the jointly prepared Oxfordshire Plan 2050 would be completed and that this strategic plan would inform the housing requirements for each Local Plan to accommodate.
- IQ15.2. The Oxfordshire Plan production ceased in August 2022. It ceased because we couldn't agree on key assumptions made within the evidence base in relation to job growth and housing need - see response to IQ13. We considered that this evidence had methodological flaws and provided detailed feedback on these technical matters (see 27/03/23 in [Appendix 1](#)

¹ [Interim Duty to Cooperate Statement December 2024 | Cherwell District Council](#) (We suggest submission of this to the Examination library)

and corresponding [044 Minutes](#) in Appendix 2), including household formation rates, job growth assumptions, job take up rates, and commuting / work from home assumptions. Between the Oxfordshire Plan authorities, we could not reach common ground on these assumptions through the Oxfordshire Plan process.

- IQ15.3. As set out under IQ13 and IQ14 above, Oxford and Cherwell progressed their local plans with a HENA using the same approach from the same consultants as in the emerging OGNA. South and Vale were not invited to participate.
- IQ15.4. Oxford then submitted its own Local Plan for examination in March 2024 (despite a request from us in the letter dated 19 January 2024 that Oxford should not take that step but should instead engage further with us on DtC matters (see 19/01/2024 in [Appendix 3](#) and corresponding [entry 'E' Letter](#) in Appendix 4) and the disagreement thereafter became a matter that would require resolution through Oxford's Local Plan examination. This resolution was provided in the Oxford examination Inspectors' letter of 11 September 2024 ([examination library reference LNP05](#)), albeit our attempts to clarify with Oxford precisely what its position would be as a result were rebuffed (as shown by the correspondence in Appendices 2 and 3 of CSD09.1). As noted above, the Oxford Local Plan was ultimately withdrawn in January 2025.
- IQ15.5. From August 2022, when the Oxfordshire Plan ceased, South and Vale were actively engaging on the question of Oxford's unmet housing need, initially through engagement on Oxford's own local plan in parallel with the work being undertaken to help inform the JLP. We were seeking to reach a shared position that housing needs should be assessed by reference to the standard method but it required the intervention of the Oxford examination Inspectors to establish that use of the standard method was the appropriate basis for considering Oxford's housing needs. At the same time, we were objecting to Oxford and Cherwell evidence (the HENA) and the Oxford Local Plan in relation to their failure under the Duty to Co-operate. Because of our objections to the HENA evidence, knowing it was flawed, the JLP continued to progress and could only have met the agreed unmet housing need amount that had already been evidenced by the previous Oxfordshire Strategic Housing Market Assessment. This was a sound approach because this unmet need was already expressed in adopted Local Plans, so it has collective agreement.
- IQ15.6. There are no proposals in the JLP that changes or indicates that we will renege on previous agreements on Oxford unmet need. There is also no new evidence to inform a new unmet need requirement (see paragraphs IQ14.11-14.13 above). No new evidence was needed on existing unmet need, and the JLP continues the previous approach to identify this amount

and provide for it as our adopted Local Plans do, but over a new plan period. The agreement on unmet need is confirmed in [examination library references GRO01](#) Memorandum of Co-operation between the Local Authorities in the Oxfordshire Housing Market Area and [examination library reference GRO02](#) Oxfordshire Statement of Co-operation.

- IQ15.7. There is an outstanding objection from Oxford City Council about how Oxford unmet housing need is met within the JLP. Oxford's objection is that two years of unmet need have been taken off for Vale (between 2019-2021) and they claim that there is no evidence that these homes have been delivered. Our position is that we have delivered homes in 2019/20 and 2020/21, including on sites in the Abingdon-on-Thames and Oxford Fringe sub area (a sub area identified in the adopted Vale of White Horse Local Plan 2031), and that 2019 to 2021 falls before the start of JLP's plan period. Further detail is provided in responses to IQ58 and IQ59. On 28 November 2024 we met with Oxford City to try to resolve this matter and to understand why this impacts on Oxford (see 28/11/2024 in [Appendix 1](#) and corresponding [119 Minutes](#) in Appendix 2). We have provided Oxford with further updated delivery information. We continue to talk with Oxford on this matter as we engage on the preparation of the bilateral Statement of Common Ground.
- IQ15.8. The Duty to Co-operate Statement ([examination library reference CSD09.1](#)) discusses the issues raised by Oxford City Council at paragraphs 2.95 to 2.111 and in Appendix 1 sets out a detailed assessment of whether any of those issues give rise to "*strategic matters*" engaging the Duty to Co-operate. The way in which both the established unmet need and whether there is any emerging unmet need are addressed is dealt with in paragraphs 2.97 to 2.103. As explained at paragraph 2.96, South and Vale do not consider that the issues raised by Oxford are concerned with strategic matters (as defined by section 33A(4) PCPA 2004).

IQ16 Oxfordshire Councils prepared a Joint Housing and Economic Land Availability Assessment Methodology (HELAA). However, what specific engagement took place on the Councils own HELAA?

- IQ16.1. The first step in preparing our HELAA was establishing a joint methodology with the other local planning authorities in Oxfordshire. The aim of this was to enable the city and district councils to undertake their HELAAs using a consistent approach and assumptions. This would result in a more consistent picture of land availability across Oxfordshire, helping inform cross-boundary strategic planning, (such as the Oxfordshire Plan 2050), and future local plans.
- IQ16.2. However, in this joint methodology, we agreed that there are some locally-specific assessment criteria and assumptions that would need to be determined by each individual HELAA. Key examples include the difference between site capacity and thresholds for assessing sites, between the more urban Oxford City, and the rural districts.
- IQ16.3. The joint HELAA working group publicly consulted on the joint draft HELAA methodology in April 2021, in a consultation run by the Oxfordshire Plan team.
- IQ16.4. Following this, we invited landowners, agents, developers, community groups and others who were interested in having land considered for development in the JLP, to submit information to us on the sites they wanted to be assessed. This exercise was known as the 'call for land and buildings available for change' and was run between 19 August and 30 September 2021. Whilst the submission window formally closed 30 September 2021, we continued to accept new submissions. The sites submitted through this process formed the basis for developing the HELAA, alongside other sites submitted to us through an earlier "call for sites" run in the Vale of White Horse, and as part of the Oxfordshire Plan.
- IQ16.5. We consulted the other Oxfordshire planning authorities on three key methodological assumptions via email on 16 August 2023 (see 16/08/2023 in [Appendix 1](#) and corresponding [055 Emails](#) in Appendix 2) site density assumptions, employment assumptions and developable site area assumptions.
- IQ16.6. We first published and publicly consulted on the HELAA ([examination library reference HES21.1](#)) as part of the Preferred Options (Regulation 18) consultation between 10 January and 26 February 2024. This was based on the locally-specific assumptions we had shared with the other Oxfordshire authorities in August 2023. We received responses relating to specific sites, the HELAA methodology, and our conclusions. Our preferred options consultation statement ([examination library reference LPP07.2](#), pp345 to 347)) summarises key issues raised during the consultation, alongside an explanation our responses to them.

- IQ16.7. We further updated the HELAA in 2024 to take account of comments we received as part of the Preferred Options (Regulation 18 Part 2) consultation. This included amending for the information or boundaries for specific sites, as well as adding additional sites that site promoters had submitted to the council. For all sites, we also amended our assessment of sites' suitability for development, now excluding agricultural land classification from consideration. This was because we had concerns over the age and reliability of the agricultural land classification data (for more information please see [examination library reference HES21.4](#), paragraph 46).
- IQ16.8. We published the updated HELAA ([examination library reference HES21.4](#)) alongside the pre-submission publication consultation on the plan between 1 October and 12 November 2024. Our Regulation 22 Consultation Statement – Appendix H summarises the key issues raised during that consultation ([examination library reference CSD10.1](#)).

IQ17 Reference is made to 'bespoke informal engagement with all Oxfordshire authorities' at paragraph 2.36 of the DtC Statement regarding the assumptions used in the Councils own HELAA. Is there supporting evidence of these meetings? How did engagement influence the outcome of the HELAA and subsequent policy outcomes?

- IQ17.1. As set out above, we consulted the other Oxfordshire planning authorities on three key methodological assumptions for our emerging HELAA via email on 16 August 2023 (see 16/08/2023 in [Appendix 1](#) and corresponding [055 Emails](#) in Appendix 2): site density assumptions, employment assumptions and developable site area assumptions.
- IQ17.2. Responses were received from each of the authorities, a copy of each response received is attached, in summary:
- IQ17.3. Cherwell District Council responded (see reference in para IQ17.1) to confirm they had no concerns in principle with the assumptions proposed.
- IQ17.4. Oxford City Council responded (see reference in para IQ17.1) that they did not have significant comments in relation to the methodology. However, they considered that the density assumptions should be higher on the sites next to Oxford. They also commented that the developable area ratios for large sites do seem high, and that there is probably enough information to make a bespoke judgements on some of the large sites about land take required for open space, which would probably lead to a higher assumption of capacity.

- IQ17.5. West Oxfordshire District Council noted (see reference in para IQ17.1) the density assumption were based on the adopted South Oxfordshire Local Plan Policy STRAT5 ([examination library reference ALP01](#)). They queried how the density assumption would be applied in different circumstances when proximity to public transport is taken into account. They noted the employment assumption used are standard and that West Oxfordshire also uses the same assumption. They added that the developable area assumptions look entirely reasonable, but may need further explaining.
- IQ17.6. We carefully considered the comments received from the other authorities involved with preparing the Joint HELAA Methodology. However, as no significant comments/concerns were raised with the proposed methodology and in order to ensure the site capacities were assessed on a consistent basis, no changes to the methodology were made. The HELAA main report ([examination library reference HES21](#) paragraphs 58 to 70 and [examination library reference HES21.4](#) paragraphs 61 to 73) produced following this engagement exercise provides further clarity on the approach taken to assessing development capacity and confirms the assumptions on developable area and density are an indicative estimation of the capacity of site. Actual capacity would be ascertained through more detailed site assessment, either through plan making if we needed to find any additional sites to accommodate identified residential, employment (or other land use) needs or through a planning application process.

IQ18 Can the Councils provide evidence of engagement regarding site allocations which lie adjacent to neighbouring districts?

- IQ18.1. The Joint Local Plan contains three site allocations that lie adjacent to Oxford City Council. There are no other allocations that lie adjacent other neighbouring districts.
- IQ18.2. The three site allocations adjacent to Oxford City are already allocated in the existing South Oxfordshire Local Plan 2035 ([examination library reference ALP01](#)). Therefore, engagement on the principle of allocation took place in relation to that plan. The allocation of these sites was supported by the neighbouring authority.
- IQ18.3. We have agreed Memoranda of Understanding between ourselves (South) and the City Council on the lettings agreement for these sites ([examination library reference HES20](#)), which was agreed in 21 June 2023.
- IQ18.4. The Joint Local Plan engagement on these sites has focused on the formal consultation period at Regulation 18 Part 2 ([examination library reference LPP01](#)) which detailed the proposed minor tweaks to the content and presentational style of these allocation policies. This took

place between 10 January to 26 February 2024 (see [Appendix 1 - Table of Engagement](#)).

- IQ18.5. Representations were invited on the Regulation 19 pre-submission publication version of the Joint Local Plan 2041, between 1 October to 12 November 2024 (see [Appendix 1 - Table of Engagement](#)).
- IQ18.6. As demonstrated in [Appendix 1 - Table of Engagement](#), there were other meetings with the City Council where they had the opportunity to raise matters relating to the allocation of these sites, but none were raised.

IQ19 A number of entries in the Table in Section 3 of the DtC Statement refers to meetings held with regards to the Oxfordshire Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment 2024 (GTAA) (HES13.1). Can evidence be provided of that engagement?

- IQ19.1. Yes, there was extensive engagement because this was a joint study (see [Appendix 1 - Table of Engagement](#)). All of the Oxfordshire district and city councils have been working together to understand the needs of gypsies, travellers, travelling showpeople and boat dwellers in the County on an Oxfordshire-wide assessment.
- IQ19.2. By way of background to this engagement, which is long-standing, the Oxfordshire Plan team had commissioned a county-wide GTAA study to support the Oxfordshire Plan. The consultants for that study undertook some fieldwork but produced no figures or draft findings, and the project was never completed.
- IQ19.3. In late 2022, after the Oxfordshire Plan work ended, the councils agreed to continue the approach of a joint study and commission a new joint GTAA, overseen by an officer working group with a representative from each council: West Oxfordshire (who volunteered to be lead commissioning authority), Oxford City Council, Cherwell District Council and South and Vale District Councils. The new GTAA took some time to commission, because the first step involved legal teams preparing and signing a Partnership Agreement, followed by the next step of the procurement process. Arc4 was appointed in October 2023 and undertook fieldwork between April and May 2024, before producing a draft report in July 2024.
- IQ19.4. The draft report indicated significantly higher pitch requirements than the previous studies in Oxfordshire (see IQ60) for all the districts outside Oxford (with a zero requirement). South and Vale officers had concerns about several aspects of the methodology, which we raised at a series of meetings, including OPPO meetings on 17 July (see 17/07/2024 in [Appendix 1](#) and corresponding [097 Minutes](#) in Appendix 2), 15 August

(see 15/08/2024 in [Appendix 1](#) and corresponding [100 Minutes](#) in Appendix 2), 12 September (see 12/09/2024 in [Appendix 1](#) and corresponding [102 Minutes](#) in Appendix 2), 10 October (see 10/10/2024 in [Appendix 1](#) and corresponding [108 Minutes](#) in Appendix 2), 7 November (see 07/11/2024 in [Appendix 1](#) and corresponding [115 Minutes](#) in Appendix 2) and 5 December 2024 (see 05/12/2024 in [Appendix 1](#) and corresponding [112 Minutes](#) in Appendix 2) and specific meetings on the GTAA (30 September - see 30/09/2024 in [Appendix 1](#), 25 October - see 25/10/2024 in [Appendix 1](#), and 13 November 2024 - see 13/11/2024 in [Appendix 1](#) and corresponding [117 Email](#) in Appendix 2). For example, we queried the approach to household formation and whether to use the household demographic information from the survey data grossed up to account for non-responses, or locally-derived household growth rates. To resolve these issues, the councils agreed to ask the consultant to conduct sensitivity testing using the household growth rate approach, and to present four different scenarios. These led to the range of figures presented, with a principal scenario and three other scenarios, as set out in the GTAA (HES13.1 and LPA01) and the Housing Topic Paper (TOP03.2). All authorities approved the final GTAA report.

- IQ19.5. In terms of planning for pitch and plot requirements in the JLP, all the needs from South and Vale are met within South and Vale.

IQ20 Which cross-boundary/strategic issues arose during the preparation of the GTAA and how were those resolved?

- IQ20.1. One cross-boundary/ strategic issues arose during the preparation of the GTAA. On 18 October 2023 Wokingham Borough Council (see 18/10/2023 in [Appendix 1](#) and corresponding [067 Letter](#) in Appendix 2) contacted us to indicate that they might have unmet needs for the travelling community. On 29 November 2023 Wokingham Borough Council (see 29/11/2023 in [Appendix 1](#) and corresponding [070 Letter](#) in Appendix 2) formally requested assistance to meet an identified need for Gypsy and Traveller pitches. At this time, we were in the earlier stages of commissioning our own evidence jointly with the other Oxfordshire Local Planning Authorities. We met with Wokingham on 25 April 2024 (see 25/04/2024 in [Appendix 1](#) and corresponding [088 Email and Minutes](#) in Appendix 2) and they confirmed that the request to neighbouring authorities was a precautionary approach and that it was hoped an Inspector will consider windfall development to meet their remaining need to be a sound approach. We shared our emerging GTAA results during November (see 05/11/2024 in [Appendix 1](#) and corresponding [113 Minutes](#) in Appendix 2) and December 2024 with Wokingham and confirmed there were no GTAA unmet needs arising from South and Vale on 6 December 2024 (see 06/12/2024 in [Appendix 1](#) and corresponding [124 Email](#) in

Appendix 2). By the time of signing of the SOCG with Wokingham on 9 December 2024 (see 09/12/2024 in [Appendix 1](#)) ([examination library reference DUC09](#)), the parties agreed there were no unmet needs with Wokingham either way and the issue was resolved.

IQ21 Were any cross-boundary/strategic issues identified in terms of the approach which the Plan took to accommodating the needs arising from the GTAA? If so, how were those resolved? Can evidence be provided of this engagement?

- IQ21.1. None of the Oxfordshire councils identified unmet pitch, plot or mooring needs arising from the GTAA and asked South and Vale to plan for it. Similarly, in the JLP, all the needs from South and Vale are planned to be met within South and Vale.
- IQ21.2. Oxford City Council objected at the Regulation 19 stage of the JLP to the allocation of 6-10 pitches on strategic sites within South Oxfordshire bordering Oxford. This includes a site AS3 which is part owned by the City Council. This is not a cross-boundary strategic issue. The JLP carries forward the same approach of including pitch provision on strategic sites as in the adopted South Oxfordshire Local Plan and the allocation does not give rise to any significant impacts on two (or more) planning areas.

IQ22 Can the Councils set out a specific timeline which indicates when and with whom engagement took place on the evidence base for employment, including the methodology and geography of the Employment Land Needs Assessment (ELNA) for the Plan?

- IQ22.1. We recognise the importance of the ELNA and the need for transparency and engagement in the development of this key piece of evidence. The timeline below describes chronologically the engagement process for the ELNA.
- IQ22.2. September – November 2023: Stakeholder workshops were held with relevant property agents and landowners. Insights were sought on issues such as the different needs of different types of businesses, spatial and policy preferences of different sectors, how best to accommodate future potential developments and any evidence of market failure i.e. issues regarding land ownership (where owners might be under-investing or under-developing) or any viability challenges (where large costs disincentivise development).
- IQ22.3. 5 September 2023: Discussion with Oxfordshire Local Enterprise Partnership (OxLEP). This covered topics such as the nature of demand

for sites and premises as well as the demand/supply outlook and any specific challenges businesses experience within South Oxfordshire and Vale of White Horse, and Oxfordshire more widely, and whether these differ or are pronounced locally. Topics of discussion also included the update to the Strategic Economic Plan to ensure alignment with all relevant regional/Oxfordshire growth strategies.

- IQ22.4. 8 January 2024: The ELNA Phase 1 report was prepared and published as part of the Regulation 18 Part 2 consultation. Through this consultation we received feedback from the public and stakeholders on the findings and recommendations of the ELNA Phase 1 report which were reviewed by the Council and the ELNA authors. The Phase 2 report was produced considering the feedback and recommendations received and the Phase 2 ELNA was published on 1 October 2024 as part of the Regulation 19 publication. This included a more detailed review of the requirements of specific sectors of local and national importance, and of affordable workspace needs.
- IQ22.5. 28 November 2024: Met with Oxford City Council to discuss cross-boundary employment issues. Details of this meeting can be found in [Appendix 1](#) entry 28/11/2024 and the minutes of this meeting are included within the Appendix 2 at [119 Minutes](#).
- IQ22.6. The National Planning Policy Framework (December 2023) outlines the principles that Local Planning Authorities should follow in preparing their evidence base to inform employment land policies. The need for Local Planning Authorities to produce up-to-date employment land evidence base and the suggested format is outlined in national Planning Practice Guidance (PPG). The approach to the study thus reflects the requirements and directions of this guidance.
- IQ22.7. The ELNA first comprised a review of the relevant policy and strategic context including a review of local economic priorities. It then defined the Functional Economic Market Area (FEMA) and provided a comprehensive analysis of socio-economic baseline conditions relevant to the study. Following this, a review of the property market indicators in South Oxfordshire and Vale of White Horse was undertaken, with reference to comparator geographies. An Economic Demand Needs Assessment was then undertaken, from which a quantitative comparison of projected supply and demand for employment floorspace was presented. This informed the ELNA's overall conclusions and employment land policy recommendations.
- IQ22.8. This approach has been used to support numerous Local Plans, it is in line with practice guidance, and it has delivered a robust and

comprehensive assessment of employment land needs to evidence the JLP.

- IQ22.9. In terms of the geography of the ELNA, this evidenced assessed employment land needs across the South and Vale administrative areas, whilst also having consideration of the wider FEMA in line with national planning practice guidance. This is applicable geography as the ELNA evidence informs the Local Plan area covering the administrative boundaries of the districts. For further information about what was considered when designating an appropriate FEMA see response to IQ24.
- IQ22.10. At individual meetings with adjoining authorities about general duty to cooperate matters, the JLPs employment strategy and the ELNA were discussed, and these are detailed within [Appendix 1 – Table of Engagement](#).

IQ23 Can evidence (i-v) be provided for each of the entries in the timeline of this engagement?

- IQ23.1. [Appendix 1 – Table of Engagement](#) demonstrates how we have engaged key stakeholders in relation to the employment strategic matter.

IQ24 The Functional Economic Market Area has been defined by commuting data, administrative boundaries, housing and commercial data. In addition to South Oxfordshire and the Vale of White Horse, it also includes Oxford and West Oxfordshire. What engagement has been undertaken on the definition and outcome of this part of the methodology? Can evidence be provided for this?

- IQ24.1. The designation of the FEMA was shaped by consideration of the region's 'travel to work area', 'inflow' and 'outflow' self-containment, transport networks, and its housing and commercial property market areas, and by engagement at two stages (see IQ25 for summary of feedback). The ELNA ([examination library reference HES08](#)) concluded that South Oxfordshire and Vale of White Horse are relatively self-contained economically, but that it is reasonably connected with two other local authority areas:
- Oxford: (by virtue of inflow and outflow self-containment, the road and rail network, the housing and property market areas, and economic governance areas); and

- West Oxfordshire (by virtue of inflow self-containment, the road network, the housing and property market areas, and economic governance areas).

IQ24.2. These areas were therefore included in the FEMA to ensure the ELNA captured the full extent of the local labour market and other economic linkages.

IQ24.3. In terms of engagement, the ELNA Phase 1 report was prepared and published as part of the JLP Regulation 18 Part 2 consultation on 8 January 2024 ([examination library reference HES08](#)). In their Regulation 18 Part 2 and Regulation 19 representations, Oxford City Council raised no objections to the inclusion of their area within the FEMA. Oxford City Council raised other concerns regarding the methodology for the ELNA and the outcome for their area, these are described in our response to IQ25.

IQ24.4. The evidence base, as demonstrated by ELNA using the FEMA, has not identified any strategic matters arising from the Joint Local Plan's employment provision, whether in relation to employment itself or its potential implications for housing or the road network.

IQ25 Are there any outstanding concerns regarding the methodology for the ELNA? If so, what evidence is available of engagement that has taken place to resolve concerns?

IQ25.1. The outstanding concerns regarding the methodology for the ELNA come from objectors representing the development industry who thought that it leads to an underestimate of the level of employment need. They largely attributed this to a lack of a sector analysis which they claimed has the effect of underplaying the growth potential of the districts, particularly with regards to the science and innovation sector. They alleged that the ELNA does not take account of market signals, suppressed demand nor sectoral needs, so it had not considered a full range of scenarios and therefore underestimated jobs growth in the districts.

IQ25.2. The Employment Land Needs Assessment (ELNA) ([examination library reference HES08](#)) sets out a requirement for 25.8 hectares of employment land in South Oxfordshire and 113.2 hectares in Vale of White Horse. As explained in the following paragraphs, the ELNA is a robust, comprehensive and balanced assessment of the employment land needs in the districts, which therefore provides an accurate assessment of the level of employment need. While concerns have been raised that it may underestimate the level of need – an assertion which we contest – even if this position were accepted, when all sources of supply in the Joint Local

Plan are taken into account, the total employment land supply exceeds the requirements set out by the ELNA.

- IQ25.3. We do not agree with the criticism that scenarios have not been tested. The ELNA considered a range of potential growth scenarios. This included a labour demand scenario based on Oxford Economics projections, a past take-up scenario which considers past net absorption of employment floorspace and a labour supply scenario derived from labour demand accounting for population growth. Furthermore, it is important to be aware that the JLP supports an employment supply that exceeds the employment requirements allowing for churn, choice and flexibility in the local employment market.
- IQ25.4. We also do not agree that market signals and sectoral needs were not adequately considered in the ELNA. These considerations were explored as part of the consultant's engagement with property agents and land owners which were then reflected in the study accordingly. Other relevant consultations included with the chief executive of Oxfordshire LEP, which provided insight into Oxfordshire wide considerations such as emerging floorspace needs and other market signals.
- IQ25.5. As set out at the front of the ELNA, the study aligns with both the NPPF and the PPG, as it presents robust evidence supporting clearly defined designations and allocations of land for employment uses. The ELNA recognises various challenges and opportunities highlighted in the OxLEP Local Industrial Strategy 2019 ([examination library reference HES05](#)). It also recognises the Strategy's ambition to oversee the necessary 'transformation of science and technology parks and creation of new hubs'.
- IQ25.6. With regards to the demand assessment, the scenarios used were informed by individual sectoral considerations including science and innovation. For example, when considering the Professional, scientific & technical sector (the sector with the largest forecast growth), a larger proportion of the change in jobs were allocated to the R&D use class E(g(ii)) than otherwise might be typical reflecting the likely further increased prominence of such jobs relative to traditional office (E(g(i))) jobs in the future to 2041 compared with the present. This therefore recognised that demand drivers for the latter floorspace are comparatively less strong both today and are likely to be in the future based on the ELNA evidence.
- IQ25.7. So, in providing policy context, as well as an extensive property market profile, an employment land availability assessment and a robust needs assessment, the ELNA provides an appropriately detailed analysis of current relevant market drivers, signals, and the determinants surrounding needs for different property types.

- IQ25.8. Another outstanding objection to the ELNA methodology came from Oxford City Council at Regulation 19 stage (they had not raised this earlier). They contended that the ELNA contained several errors, inaccuracies and inconsistencies which resulted in discrepancies both with the overall assessed supply of employment and with the employment land needs. We met with Oxford City Council on 28 November 2024 to discuss their concerns and how these impact on Oxford (see 28/11/2024 in [Appendix 1](#) and corresponding [119 Minutes](#) in Appendix 2). At this meeting we requested clarification about some issues raised regarding the ELNA in their Regulation 19 representation that were not clear, which Oxford attempted to resolve by subsequently providing an email with further details about job number assumptions (see 05/12/2024 in [Appendix 1](#) and corresponding [123 Email](#) in Appendix 2). We engaged with our ELNA consultants to review the assumptions and claims made by Oxford, and concluded that no changes to the ELNA are required.
- IQ25.9. [Appendix 1](#) – Table of Engagement sets out the evidence of engagement that has taken place to resolve concerns regarding the methodology for the ELNA.

IQ26 Several meetings were held with West Berkshire regarding their employment land unmet need. Was this resolved?

- IQ26.1. [Appendix 1 – Table of Engagement](#) references several meetings and emails that we have had with West Berkshire District Council in relation to how the JLP deals with any general strategic matters. Likewise, the Statement of Compliance with the Duty to Co-operate, [examination library reference CSD09.1](#) (pages 20-21) sets out a narrative of our engagement. The Statement of Compliance explains that there are no strategic matters relating to the JLP which are in dispute with West Berkshire, although progress on the West Berkshire Local Plan examination will need to be followed to ensure this remains the case from West Berkshire's perspective with their Local Plan. We invited West Berkshire to work with us on a SoCG, but there are no current plans to commence one.
- IQ26.2. The West Berkshire Local Plan Review examination is currently underway, with their consultation on Main Modifications having closed recently on 31 January 2025. During the examination of the West Berkshire Local Plan Review, it was claimed that new allocations and positive policies will help to meet the area's objectively assessed employment needs in full. No Main Modifications were proposed related to the matter of potential shortfalls of land to meet their employment needs.

IQ27 Can any evidence be provided of this engagement and confirmation of the outcome of discussions?

- IQ27.1. Evidence of this engagement is provided within [Appendix 1 – Table of Engagement](#) and its accompanying [Appendix 2 – Evidence of Engagement](#) containing meeting notes and emails between us and West Berkshire District Council.

IQ28 The employment land supply exceeds requirement, and this is reflected in the Plan's approach to employment. What would be the implications for adjoining authorities?

- IQ28.1. The Employment Land Needs Assessment (ELNA) ([examination library reference HES08](#)) sets out a requirement for 25.8 hectares of employment land in South Oxfordshire and 113.2 hectares in Vale of White Horse. When all sources of supply are taken into account, the JLP exceeds the total employment land requirements.
- IQ28.2. The ELNA found that the undeveloped land within existing allocations was sufficient to meet and exceed the needs forecast, and the assessment of supply did not identify existing sites that were unsuitable or unavailable to meet needs such that other sites should be identified to replace the provision that would be lost if they were deemed unsuitable. This also accords with the consultant's experience on other employment land studies such that allocating additional land is not necessary provided the existing supply is suitable and available. The key locations of land supply identified to meet need in the districts such as Harwell, Milton Park and Culham, as well as other locations, were deemed suitable for allocation in the previously adopted local plans and were assessed to remain suitable in the ELNA.
- IQ28.3. This supply therefore comprises the continuation of existing employment land allocations from the adopted South Oxfordshire and Vale of White Horse local plans rather than the allocation of significant additional land. The decision to carry forward these allocations ensures that the local employment market retains the necessary flexibility to support business churn, provide occupier choice, and accommodate changing market needs over the plan period.
- IQ28.4. The employment land supply has important positive implications for adjoining authorities because by maintaining this level of employment land availability, it supports the functioning of Oxfordshire's wider economy, reflecting the connectivity of employment sectors across the Knowledge Spine (please see Oxfordshire Local Industrial Strategy 2019, page 26, [examination library reference HES05](#)) and to Oxford city. A diverse supply

of employment sites across the county helps to sustain economic growth, encourage sectoral specialisation, and retain investment within the region. By ensuring that suitable premises remain available, the plan contributes to Oxfordshire's overall economic resilience and competitiveness.

- IQ28.5. The Joint Local Plan has not made any significant new employment allocations, the employment need is met, and the housing supply is balanced with the existing employment allocations over the plan period. We have no requests for unmet employment need from other Oxfordshire authorities, nor does the JLP generate unmet employment needs. Nonetheless, we recognise that the retention of existing employment allocations has potential implications for neighbouring authorities, particularly in relation to infrastructure capacity and commuting patterns.
- IQ28.6. Oxford City Council has raised concerns in this regard, contending that the employment land allocated in the JLP has a negative impact on housing demand, infrastructure and commuting within their administrative boundary (see 28/11/24 in [Appendix 1](#) and corresponding [119 Minutes](#) and [132 Email](#) in Appendix 2) However, our employment and housing supply are balanced, and we have assessed the impacts of the Plan, as demonstrated in the Joint Housing Needs Assessment ([examination library reference HES15.1](#)) and the Sustainability Appraisal ([examination reference CSD03](#)) respectively.

IQ29 How have the Councils engaged with adjoining authorities on the potential implications?

- IQ29.1. We have actively engaged with neighbouring authorities throughout the preparation of the Joint Local Plan to ensure that cross-boundary economic implications have been fully considered. This engagement has taken place through a range of mechanisms, including:
- Formal consultation at both Regulation 18 and Regulation 19 stages, providing adjoining authorities with clear opportunities to review and comment on emerging policies and their implications (See Appendices 1 and 3)
 - Correspondence and meetings with neighbouring authorities to discuss employment matters, including reflection meetings about formal responses with some neighbouring authorities. (See [Appendix 1 - Table of Engagement](#))
 - The preparation of Statements of Common Ground, which include specific references to employment issues and areas of agreement. (See [Appendix 1 - Table of Engagement](#))
- IQ29.2. Engagement has not only been undertaken to meet the requirements of the Duty to Co-operate but it has also played a valuable role in shaping

the Plan's approach. Input from neighbouring authorities and the Local Enterprise Partnership has helped refine employment policies (See [Appendix 1 - Table of Engagement](#)) ensuring they are informed by a broader regional perspective and contribute to economic resilience across Oxfordshire. By drawing on expertise and knowledge from beyond our districts, we have sought to develop innovative policies that deliver mutually beneficial economic outcomes and strengthen the long-term sustainability of the region's economy.

- IQ29.3. Engagement with OxLEP also took place during development of the ELNA, as highlighted in the response to IQ22. Whilst not a local authority, its role in economic development in Oxfordshire meant that the insights gained from discussion of wider matters relevant to all local authorities in the county have helped shape the Local Plan's approach.
- IQ29.4. The Joint Local Plan seeks to deliver a strong and resilient economy not only within South Oxfordshire and Vale of White Horse but also as part of the wider Oxfordshire economy. Through constructive engagement, we have sought to ensure that economic benefits extend across administrative boundaries while addressing cross-border implications raised in a balanced and sustainable manner, wherever these policies are genuinely having an impact on one or more authority area. This collaborative approach reinforces our desire for strong economic linkages between Oxfordshire authorities and our approach to the employment supply provides a strong foundation for continued co-operation on general economic matters from now to beyond the plan period.

IQ30 Are there any outstanding concerns regarding the employment land and requirements? If so, what engagement has been undertaken to resolve these concerns?

- IQ30.1. Oxford City Council stated in their Regulation 19 representation that they welcome and support a vibrant economy, and view the provision of suitable employment land to enable this to flourish as vitally important. Oxford City Council reiterated this position during ongoing engagement under the Duty to Co-operate, stating in our meeting on 28 November 2024 and subsequent email on 5 December 2024 (28/11/24 in [Appendix 1](#) and corresponding [119 Minutes](#) and [123 Email](#) in Appendix 2) that they do not have an objection to employment growth in South and Vale, and agree that it is important for the local economy. However, they highlighted concerns regarding the balance between employment and housing, whether the resulting infrastructure needs have been fully assessed and whether employment growth could lead to increased cross-boundary commuting.

- IQ30.2. During the meeting with Oxford City Council officers on 28 November 2024 we explained that the JLP makes no significant new employment allocations, and that the assumptions they have made around job numbers arising from the plan are not correct. We also explained that the delivery of all of the employment land identified in the plan is very likely to extend beyond the plan period, giving long-term confidence in a healthy employment land supply in the districts. The housing supply identified in the plan is therefore sufficient to accommodate anticipated job growth, ensuring a sustainable balance between employment and residential development. This has been verified by the consultants commissioned to undertake our Employment Land Needs Assessment ([examination library reference HES08](#)) and Joint Housing Needs Assessment ([examination library reference HES15.1](#)) – please also see our response to IQ56/57 for more information on the relationship between job and housing growth. Additionally, we have engaged with infrastructure providers to fully assess the strategic infrastructure needs associated with the residential development planned to accommodate this employment growth, as documented in the Infrastructure Delivery Plan ([examination library reference CSD05.1](#)). These discussions will continue as part of implementing the Joint Local Plan. A comprehensive record of the issues raised by Oxford City Council and our responses to them can be found in the Statement of Compliance with the Duty to Cooperate ([examination library reference CSD09.1](#)) on pages 24 to 29 and in [Appendix 1](#).
- IQ30.3. In conclusion, the JLP's approach to employment does not generate any strategic matter (as defined in section 33A(4)(a) PCPA 2004). We remain committed to cross-boundary collaboration to ensure that economic growth is supported in a sustainable manner. The Joint Local Plan seeks to maintain Oxfordshire's strong and linked economic position while ensuring development is managed in a way that aligns with housing and infrastructure delivery.

IQ31 Appendix 1 of the DtC Statement states that records show that Oxford City Council were invited to discuss the Lowland Fens Study. Is there evidence to support this stance?

- IQ31.1. Yes, a summary of this engagement is provided within [Appendix 1 - Table of Engagement](#) (see 17/07/24 in [Appendix 1](#) and corresponding [097 Minutes](#) in Appendix 2, 28/11/24 in [Appendix 1](#) and corresponding [119 Minutes](#) in Appendix 2, and Emails [099](#) and [111](#) in Appendix 2) and full copies of the meeting minutes/emails are provided within the Appendix 2 – Evidence of Engagement.

- IQ31.2. Engagement with neighbouring authorities, including Oxford City Council, in relation to the Lowland Fens Study is addressed in detail in the response to IQ32 below.

IQ32 What engagement took place with other prescribed bodies and adjoining authorities in relation to the Lowland Fens Study?

- IQ32.1. The engagement that took place with prescribed bodies and adjoining authorities in relation to the Lowland Fens Study is set out below. It is important to highlight that this engagement reflects our ongoing dialogue with these bodies, even though the matter of lowland fens itself is not a strategic matter to which the Duty to Co-operate applies (as stated at paragraph 2.111 and Appendix 1 Item 12 of the Statement of Compliance with the Duty to Cooperate ([examination library reference CSD09.1](#))).

Engagement with adjoining authorities

- IQ32.2. The Lowland Fens Study was first discussed at the Oxfordshire Planning Policy Officers (OPPO) meeting on 17 July 2024. This meeting is attended by officers representing all the Oxfordshire authorities, including Oxford City Council. At this meeting, the background and scope of the Lowland Fens Study were explained and the potential for fen's hydrological catchments to cross administrative boundaries was highlighted. No concerns or queries were expressed at this stage, nor did Oxford City Council mention their own approach to lowland fens. The minutes of this meeting, as agreed by all the Oxfordshire authorities at the subsequent OPPO meeting on 15 August 2024, are listed in Appendix 1 - Table of Engagement (see 17/07/24 in [Appendix 1](#) and corresponding [097 Minutes](#) in Appendix 2 and 15/08/2024 in [Appendix 1](#) and corresponding [100 Minutes](#) in Appendix 2) and are provided in full within the Appendix 2 – Evidence of Engagement.
- IQ32.3. On 13 August 2024 an email was sent to adjoining authorities (including Oxford City Council) to inform them that the Lowland Fens Study had been commissioned. The scope of the study was explained, and a copy of the full specification was provided. The potential for fens and/or their hydrological catchments to cross administrative boundaries was clearly stated. Adjoining authorities were asked if they had any questions about the study and/or if they would like to discuss it further. None of the adjoining authorities responded to this email. A summary of this email is provided within the Appendix 1 - Table of Engagement (see 13/08/24 in [Appendix 1](#) and corresponding [099 Email](#) in Appendix 2) and a full copy of the email is provided within the Appendix 2 – Evidence of Engagement.
- IQ32.4. As no concerns or items for discussion were raised by any of the adjoining authorities, adjoining authorities were updated as soon as practicable after the study was published at Regulation 19. An email was sent to

adjoining authorities on 23 October 2024 to provide an update on the Lowland Fens Study, highlighting where it is identified that fens' hydrological catchments extend across local authority boundaries. Again, adjoining authorities were asked if they had any questions about the study and/or if they would like to discuss it further. None of the adjoining authorities responded to this email. A summary of this email is provided within the Appendix 1 - Table of Engagement (see 23/10/24 in [Appendix 1](#) and corresponding [111 Email](#) in Appendix 2) and a full copy of this email is provided within the Appendix 2 – Evidence of Engagement.

IQ32.5. The Lowland Fens Study was published at the Regulation 19 stage, providing a further opportunity for adjoining authorities to review and comment on the study ([examination library reference NHL06](#)). Two authorities commented on the Lowland Fens Study in their Regulation 19 representations:

- Oxford City Council – Details are provided at paragraph 2.111 and Appendix 1 Point 12 of the Statement of Compliance with the Duty to Cooperate ([examination library reference CSD09.1](#)).
- Oxfordshire County Council – Details are provided at paragraphs 21-23 of the Statement of Common Ground with Oxfordshire County Council ([examination library reference DUC06](#)).

IQ32.6. A meeting with Oxford City Council took place on 28 November 2024 to discuss their Regulation 19 representations, including their comments on the Lowland Fens Study. Points discussed included:

- i) Whether the study results in cross-boundary impacts;
- ii) Whether mapping within Oxford should be included;
- iii) Oxford City's bespoke approach to lowland fen buffer zones; and
- iv) Engagement between the authorities in relation to the Lowland Fens Study.

The full minutes of this meeting are provided in Appendix 2 – Evidence of Engagement (see 28/11/24 in [Appendix 1](#) and corresponding [119 Minutes](#) in Appendix 2)

Engagement with the Environment Agency (EA)

IQ32.7. An email was sent to the EA on 28 March 2024 advising that we were considering specific policy protections for lowland fens. The EA were asked if they might be able to supply or advise on the hydrological mapping needed. No response to this email was received. A summary of this email is provided within the Appendix 1 - Table of Engagement (see 28/03/24 in [Appendix 1](#) and corresponding [086 Email](#) in Appendix 2) and a full copy of the email is provided within the Appendix 2 – Evidence of Engagement.

IQ32.8. A meeting with the EA took place on 8 May 2024. Again, it was highlighted that we were considering specific policy protections for lowland fens. The

EA were asked if they might be able to supply or advise on the hydrological mapping needed. The EA directed us to Natural England. The minutes of this meeting are listed in the Appendix 1 - Table of Engagement (see 08/05/2024 in [Appendix 1](#) and corresponding [091 Minutes](#) in Appendix 2) and are provided in full within the Appendix 2 – Evidence of Engagement.

- IQ32.9. The EA's Regulation 19 representations did not comment on the Lowland Fens Study.

Engagement with Natural England (NE)

- IQ32.10. NE's Regulation 18 Part 2 Preferred Options representations encouraged us to identify and include other Irreplaceable Habitats and Priority Habitats (beyond just Ancient Woodland and Veteran Trees) within the proposed biodiversity designations policy to provide them with the highest level of protection, with specific reference to alkaline fens. The representation highlighted their expectations for further consideration of water sensitive designated sites. NE highlighted that their water remit focusses on ensuring that habitats and designated sites are protected from water-related development impacts, which may extend beyond a development site's boundary. NE also made specific comments in relation to the assessment of potential hydrological impacts of development at Dalton Barracks Garden Village on surrounding lowland fen habitats including Cothill Fen SAC and SSSIs.
- IQ32.11. An email was sent to NE on 20 March 2024 informing them that we were considering the appropriate policy approach for lowland fens. The email also asked if NE held data relating to Cothill Fen SAC's hydrological catchment. No response to this email was received. A summary of this email is provided within Appendix 1 - Table of Engagement (see 20/03/24 in [Appendix 1](#) and corresponding [084 Email](#) in Appendix 2) and a full copy of the email is provided within the Appendix 2 – Evidence of Engagement.
- IQ32.12. A meeting with NE took place on 1 May 2024. NE asked for more recent hydrological catchment mapping for Cothill Fen SAC. It was explained that we intended to commission a Lowland Fens Study. The minutes of this meeting are listed in the Appendix 1 - Table of Engagement (see 01/05/24 in [Appendix 1](#) and corresponding [089 Notes](#) in Appendix 2) and are provided in full within the Appendix 2 - Evidence of Engagement.
- IQ32.13. A further meeting with NE took place on 6 November 2024. No questions or concerns were raised about the Lowland Fens Study. The minutes of this meeting are listed in the Appendix 1 - Table of Engagement (see 06/11/24 in [Appendix 1](#) and corresponding [114 Notes](#) in Appendix 2) and are provided in full within the Appendix 2 - Evidence of Engagement.

IQ32.14. NE's Regulation 19 representations did not comment on the Lowland Fens Study.

IQ33 The table in section 3 includes reference to several meetings relating to transport and infrastructure; however, is there evidence (i-v) to support these meetings?

IQ33.1. Please see [Appendix 1 - Table of Engagement](#) and [Appendix 2 - Evidence of Engagement](#). This contains the details of the meetings and engagement.

IQ34 Are there any unresolved issues relating to transport and infrastructure and if so, what attempts have been made to resolve those issues, including supporting evidence?

IQ34.1. Yes, there are unresolved objections with the councils to the south of South Oxfordshire and Oxford City. This relates to the creation of a Third Thames Crossing near Reading and the Cowley Branch Line. Minor issues are also present between ourselves and Oxfordshire County Council which are set out below.

Third Thames Crossing

IQ34.2. A potential Third Thames Crossing for Reading (rebranded as Cross Thames Travel) has been promoted for several years by neighbouring authorities near Reading. Oxfordshire County Council, as Highway Authority, does not support the proposal. We consider the crossing proposal would have significant adverse impacts on the local area, including environmental, congestion, and visual impact. The land is not safeguarded in the JLP to accommodate this scheme.

IQ34.3. We do not consider this is a soundness matter and therefore does not require modification to the submitted plan.

IQ34.4. Statements of Common Ground agree South and Vales's position with Reading BC (DUC07 see para 4.18-4.19) and Wokingham BC (DUC09 para 4.16-17), and in both cases the authorities confirm that we have engaged effectively and on an on-going basis during the plan making process.

Cowley Branch Line – Oxford City Council

IQ34.5. Oxford City's response to our proposed submission consultation (Regulation 19) Joint Local Plan sought for the Cowley Branch Line to be included in policies AS3 and AS4 for Land South of Grenoble Road and a

Land at Northfield respectively, as well as inclusion of the rail services in the Infrastructure Delivery Plan for those sites.

- IQ34.6. The Infrastructure Delivery Plan (CSD05.1) includes entries for the site schedules for *"any additional sustainable transport upgrades / enhancements (including for public transport, walking and cycling) required to bring forward the development."* This approach will allow the council to seek contributions towards Cowley Branch Line, under Policy IN1 – Infrastructure and service provision, if justified when considering a planning application.
- IQ34.7. We last discussed the branch line with Oxford City Council officers at a meeting on 28 November 2024 (see 28/11/2024 in [Appendix 1](#) and corresponding [119 Minutes](#) in Appendix 2), however this remains an area of disagreement between ourselves and Oxford City.
- IQ34.8. Our view is that there is currently insufficient justification to require contributions from our allocations, however should that be forthcoming the approach in the JLP allows for contributions to be directed to the CBL. Therefore, we do not consider this a soundness matter that requires a modification to the plan, as the plan is effective.

Other minor unresolved transport issues

- IQ34.9. Oxfordshire County Council's Regulation 19 response welcomes the inclusion of the Cowley Branch Line in supporting text for AS3 and AS4 but identifies that the JLP could provide further support for the rail scheme in the associated policies and Infrastructure Delivery Plan.
- IQ34.10. There are other, minor unresolved issues with Oxfordshire County Council relating to transport and infrastructure, which are acknowledged in the Statement of Common Ground between South Oxfordshire and Vale of White Horse District Councils and Oxfordshire County Council ([examination library reference DUC06](#)). The County Council is seeking modifications to the Joint Local Plan as set out in their Regulation 19 response. A summary of the County's proposed modifications is set out in Appendix 1 of the Statement of Common Ground.

IQ35 What engagement has taken place on the Infrastructure Delivery Plan? Is there evidence to support this?

- IQ35.1. We commenced work on the Infrastructure Delivery Plan (IDP) in February 2024, following the launch of the preferred options consultation (Regulation 18 Part 2). We reviewed the existing IDPs for each council, since all the site allocations proposed in the JLP preferred options featured in those documents. This desktop review checked for any change in circumstances that would justify alternative infrastructure provision (for example, a change in the quantum or use class of an allocation).
- IQ35.2. Following this review, we then shared our findings with stakeholders responsible for delivering, operating, or coordinating key infrastructure or services in the plan area. Throughout April and May 2024, we contacted the following organisations to seek updates on their expected infrastructure needs for the sites:
- a) Oxfordshire County Council
 - b) Thames Water
 - c) Thames Valley Police
 - d) Berkshire, Oxfordshire, and Buckinghamshire Integrated Care Board (BOB ICB)
 - e) National Grid
 - f) Southern Gas Network
 - g) Internal waste collection team
 - h) Internal public arts team
- IQ35.3. We shared the draft expected infrastructure contributions with the above bodies, identifying where we believed updates would be needed, although we invited comments on all site infrastructure. We shared this information as an editable spreadsheet.
- IQ35.4. The following infrastructure providers / operators responded directly to this request, either giving updates on the editable spreadsheet, or providing generic, high-level commentary:
- a) Internal waste collection team (responded 18 April 2024)
 - b) National Grid (responded 25 April 2024)
- IQ35.5. We met with the internal South and Vale public arts officer on 12 April 2024.

- IQ35.6. We met with Thames Valley Police to discuss infrastructure contributions on 29 April 2024 (see 29/04/24 in [Appendix 1](#))
- IQ35.7. For Oxfordshire County Council we held a workshop with relevant officers on 30 April 2024 to review each site (see 30/04/2024 in [Appendix 1](#)). This covered highways and transport (including active and sustainable travel), primary, secondary and post-16 education, special educational needs, adult social care, libraries, public rights of way, household waste recycling centres, archaeological record keeping and storage, and fire and rescue services. County officers gave their views on the infrastructure needs associated with each site, and we continued to exchange draft wording for the IDP ahead of our Regulation 19 Publicity Period in October 2024.
- IQ35.8. We continued to meet with the County Council officers throughout the course of 2024, in monthly meetings discussing the JLP and the associated IDP. This allowed us to make quick, minor changes to infrastructure needs to take account of any comments / changes in circumstances. These meetings were structured around completing the IDP tables collaboratively, and information of the meetings held on the IDP are shown on the table of engagement (see [Appendix 1 – Table of Engagement](#)).
- IQ35.9. We met with BOB ICB on 7 May 2024, who then provided detailed feedback on the health infrastructure needs for the proposed allocations on 15 May 2024 via a completed IDP spreadsheet. Officers also met with the ICB on 28 November 2024 to discuss the proposed submission local plan, and their response to the regulation 19 consultation (See 07/05/2024, and 28/11/2024 in [Appendix 1](#) and corresponding [119 Minutes](#) in Appendix 2).
- IQ35.10. We and our Water Cycle Study consultant (Wallingford Hydro Solutions) met with Thames Water on 8 May 2024 to discuss infrastructure needs. Again, there are no notes / actions from these meetings, as they were structured around completing the IDP tables collaboratively. We also held follow up meetings with Thames Water on 20 August 2024, 24 October 2024, and 14 January 2025. (See 08/05/2024, 24/10/2024 and 14/01/2025 in [Appendix 1](#) and corresponding [091 Minutes](#) in Appendix 2).
- IQ35.11. Southern Gas Network did not respond to our request for information or to meet with us.

IQ36 Are the Councils satisfied that they have prepared the Plan in accordance with their statement of community involvement (OCD02)?

- IQ36.1. We are satisfied that the Joint Local Plan 2041 has been prepared and submitted in compliance with the Joint Statement of Community Involvement (SCI) ([examination library reference OCD02](#)).
- IQ36.2. The SCI outlines the key stages of plan preparation and consultation, which have been followed. It also explains how we will undertake consultation activity. Throughout the preparation of the Joint Local Plan, we have produced a series of consultation statements and reports which evidence the various publicity methods used to support the preparation of the plan, and which demonstrate compliance with our joint SCI. These are:
- i. Issues Consultation Results ([examination library reference LPP14](#))
 - ii. Preferred Options Consultation Statement – Updated Version ([examination library reference LPP07.2](#))
 - iii. Preferred Options Consultation Statement Appendices ([examination library reference LPP07.1](#))
 - iv. Regulation 22 Consultation Statement and Appendices A-G ([examination library reference CSD10](#))
 - v. Regulation 22 Consultation Statement – Appendix H ([examination library reference CSD10.1](#))

IQ37 Were any concerns raised in the representations made under regulation 20 that the consultation failed to comply with the statement of community involvement and if so, what is the Councils response to this? (OCD02)?

- IQ37.1. One representator raised concerns in their representation made under Regulation 20 that we have not complied with the SCI regarding the allocation of Didcot Gateway (Policy AS7). The representator suggested the framing of the question during the Preferred Options Consultation (Joint Local Plan in a Nutshell version) was misleading to elicit a positive response.
- IQ37.2. We are satisfied that every stage of consultation has been undertaken in line with the methods described in the SCI. The SCI does not specify how questions should be framed. As explained in Preferred Options Consultation Statement – Updated Version ([examination library reference LPP07.2](#), see pages 189-193), two questions were posed in the Joint Local Plan in a Nutshell during the Preferred Options stage in respect of Policy AS7. The first was “How far do you agree or disagree with tweaking (fewer homes) the Didcot Gateway site allocation?” with possible

responses ranging from “strongly disagree” to “strongly agree”. The second question was open ended and invited any other comments in respect of the draft policy. 21 consultees made comments, raising a range of issues. We are satisfied that the questions were not misleading and consultees were able to fully express their views about the proposals.

- IQ37.3. While not directly citing failure to comply with the SCI, other representators raised concerns that we would not be able to meaningfully engage with representations made under Regulation 20, due to the short turnaround between the close of the Regulation 19 Publication Period and submission of the plan outlined in the Local Development Scheme. Similarly, some respondents were concerned that changes published alongside the Regulation 19 Publication Period were made too late in the process, limiting the extent to which the council could meaningfully engage with representations regarding such matters.
- IQ37.4. Council officers read each representation made under Regulation 20, analysed this, and reported on the main issues in the Regulation 22 Consultation Statement and Appendices A-G ([examination library reference CSD10](#)). Officers also reported on key issues raised per policy in the Regulation 22 Consultation Statement – Appendix H ([examination library reference CSD10.1](#)). We are satisfied that they have been able to meaningfully engage with the Regulation 19 consultation responses.

IQ38 Were any concerns raised in representations made under regulation 20 that the Plan is likely to adversely affect persons who share relevant protected characteristics as defined in section 149 of the Equality Act 2010?

- IQ38.1. We received a number of representations made under regulation 20 that raised concerns that the Plan may adversely affect persons who share relevant protected characteristics as defined in section 149 of the Equality Act 2010.
- IQ38.2. Some respondents thought the JLP had not made appropriate provision for school aged children. Some suggested there are not enough school places available to sustain the planned development. Others suggested the spatial strategy would not allow enough development to sustain schools in rural locations.
- IQ38.3. South Oxfordshire and Vale of White Horse officers have worked with the Education Team at Oxfordshire County Council throughout the production of the Joint Local Plan (see [Appendix 1 – Table of Engagement](#)) to ensure there will be an appropriate provision of school places throughout the plan period. Education provision is shown in the Infrastructure Delivery Plan (IDP) ([examination library reference CSD05.1](#)), and will be explained in

the education topic paper, which we expect to submit in March (please see our response to IQ74).

- IQ38.4. Some respondents suggested the Plan does not make appropriate provision for housing for older people, particularly raising concerns that the full need identified in the Joint Housing Needs Assessment ([examination library reference HES15.1](#)) would not be met by the allocations in Policy HOU5 (Housing for older people) nor by windfall permissions, and that the plan only allocates housing with care, not housing with support nor care homes.
- IQ38.5. The Joint Local Plan has been supported by the production of a Joint Housing Needs Assessment (JHNA) ([examination library reference HES15.1](#)) which sets out the need for housing with care and housing with support in the districts. Considering the forthcoming supply of extra care housing within the districts, the allocations in Policy HOU5 adequately meet the need for housing with care. Considering the varied attitudes of older people for living in specialist housing versus adapted housing (see pages 100-101 of the JHNA) and the overlap in the needs of older people and those in adapted housing (see page 106 of the JHNA), we have sought to meet the needs of housing with support flexibly through increasing the requirement for M4(2) Accessible and adaptable dwellings through Policy HOU4 (Housing mix and size), as well as requiring 5% of major development be designed as housing with support for older people.
- IQ38.6. One respondent suggested that the Tranquillity Assessment's ([examination library reference NHL15](#)) methodology did not appropriately consider the diversity of people's aural range when assessing non-human sound.
- IQ38.7. The Tranquillity Assessment's methodology considered a range of indicators when considering tranquillity in the districts. We do not consider the policy would adversely impact persons who share protected characteristics.
- IQ38.8. Some respondents disagreed with the plan's approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople, particularly citing that the plan was not supported by up-to-date evidence on the need for pitches.
- IQ38.9. The Joint Local Plan has been supported by the production of the Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (GTAA 2024) ([examination library reference LPA01](#)). The GTAA 2024 identifies the need for Gypsy and Traveller pitches throughout Oxfordshire. Our response to IQ61 sets out how the requirement identified

in the GTAA 2024 can be accommodated on existing sites and sites identified within the Plan.

- IQ38.10. Some respondents suggested the plan does not make appropriate provision for accommodating the needs of different religious groups.
- IQ38.11. We have not made mention to any specific religious groups within the Joint Local Plan, nor is it the role of the councils to allocate places of worship through plan making. All proposals for new places of worship would be subject to Policy HP2 (Community facilities and services), regardless of the associated religious group.
- IQ38.12. Sport England suggested Policy CE11 (Light pollution and dark skies) may cause adverse impacts for women if it is used to refuse sports lighting applications attached to new and existing outdoor sport and recreation facilities and lighting schemes designed to support active travel. They further suggested that this policy should consider the needs of those with visual impairments.
- IQ38.13. The aim of Policy CE11 is to reduce light pollution across the districts, however, Part 2(a) of the policy still allows for lighting in circumstances where there is a clear need for it, which would include for reasons of safety. The policy requires proposals to meet the requirements of the Lighting Design Guidance ([examination library reference CEQ07](#)) which is clear that measures taken to reduce the impact of outdoor lighting on the environment should still provide a feeling of safety and comfort. The guidance's checklist refers to safety as an example of a reason why light may be needed.
- IQ38.14. There were no comments raised to suggest that the Joint Local Plan would adversely impact persons based on gender reassignment, marriage or civil partnership, pregnancy and maternity, or sexual orientation.
- IQ38.15. In all cases, we are satisfied that the Joint Local Plan is not likely to adversely affect persons who share relevant protected characteristics as defined in section 149 of the Equality Act 2010.

IQ39 Was a version of the Habitats Regulations Assessment (Appropriate Assessment) published alongside the proposed submission documents for public consultation in accordance with Regulation 19?

- IQ39.1. No. The Habitats Regulations Assessment (HRA) Preliminary Screening Report (December 2023) ([examination library reference CSD04](#)) was published alongside our Regulation 19 pre-submission publication period on 1 October 2024. At this time, we were awaiting annual average daily

traffic (AADT) data from our neighbouring authorities in Oxfordshire, which was required to assess the in-combination atmospheric pollution impacts of planned development in Oxfordshire on the Oxford Meadows Special Area of Conservation (SAC).

- IQ39.2. Following the start of the Regulation 19 pre-submission publication period the AADT data was used to inform a draft HRA Appropriate Assessment Report (AAR) of the Joint Local Plan. This was supported with an Explanatory Note, which addressed the cumulative assessment of traffic impacts resulting from planned growth on the Oxford Meadows SAC.
- IQ39.3. In accordance with reg. 105(2) of the Conservation of Habitats and Species Regulations 2017, on 5 November 2024 we shared with Natural England a copy of a draft HRA AAR and the Explanatory Note (jointly agreed by the Oxfordshire Local Planning Authorities – see response to IQ43 below), for review and comment. We also considered it appropriate to share the draft HRA AAR with our neighbouring authorities (Oxford City, Cherwell, West Oxfordshire, Swindon, West Berkshire and Buckinghamshire) and did so via email on 21/22 November 2024 inviting comments on the draft document.
- IQ39.4. A meeting between ourselves and Natural England was held on 6 November 2024 (see 06/11/2024 in [Appendix 1](#) and corresponding [114 Notes](#) in Appendix 2). Following the meeting, Natural England confirmed via email on 28 November 2024 (see 28/11/2024 in [Appendix 1](#) and corresponding [120 Email](#) in Appendix 2) that it was unable to agree either the HRA AAR as drafted or the Explanatory Note because likely significant air pollution effects could not currently be ruled out for Oxford Meadows SAC, Cothill Fen SAC and Aston Rowant SAC. This is because there are roads which fall within 200m of these sites and a concern with the method used to establish AADT flows (see response to IQ43 below for more details). Natural England's current advice ("Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations- NEA001", June 2018) is that all in-combination AADT increases should be applied to assess the likelihood of significant effects on European sites within 200m of a relevant road instead of the AADT increases attributable to the additional growth in the JLP. We met with Natural England again on 4 December 2024 (see 04/12/2024 in [Appendix 1](#) and corresponding [121 Notes](#) in Appendix 2), to discuss and clarify their email of 28 November 2024.
- IQ39.5. In light of the above, we revised the HRA Appropriate Assessment Report, to record that three European Sites are screened in for further assessment in respect of atmospheric pollution due to the potential for likely significant effects (see table 5.2 page 39).

- IQ39.6. We signed a Statement of Common Ground with Natural England ([examination library reference DUC05](#)) on 9 December 2024 confirming: *'The parties agree that the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 can be considered compliant with the Conservation of Habitats and Species Regulations 2017 (as amended), with regard to Aston Rowant SAC, Chiltern Beechwoods SAC, Cothill Fen SAC, Hackpen Hill SAC, Hartslock Wood SAC, Kennet & Lambourn Floodplain SAC, Little Wittenham SAC, Oxford Meadows SAC and River Lambourn SAC, for all impact pathways except for atmospheric pollution, on which further work will be undertaken.'*
- IQ39.7. We published and submitted the HRA Appropriate Assessment Report on 9 December 2024 ([examination library reference CSD04.1](#)).
- IQ39.8. The parties are involved in ongoing discussions about the scope of modelling work required to inform the assessment of air quality impacts on these three European Sites (see response to IQ41 below). An update to the December 2024 HRA Appropriate Assessment Report will be published once this work is completed. As foreshadowed in paragraph 2.6.2 of document CSD04.1 (under the heading "Consultation"), subject to any views that the Inspectors express, it is our intention to carry out a public consultation on the amended AAR once published and to provide the responses so that they can be considered as part of the examination. We would suggest this is undertaken at the same time as the Main Modification consultation.
- IQ39.9. It is important to note that neither the Planning & Compulsory Purchase Act 2004 nor the Local Planning (England) Regulations 2012 (SI 2012/767) impose any legal requirement to publish a Habitats Regulations Assessment at Regulation 19 stage, or that an HRA must accompany plan submission.
- IQ39.10. Regulation 105(2) of the Conservation of Habitats & Species Regulations 2017 (SI 2017/1012) does, however, state that:
- '...The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies...'*
- IQ39.11. We have consulted Natural England and remain in dialogue with them as explained above and further in response to IQ41 below. We will consult them further once the updated AAR is published.
- IQ39.12. Regulation 105(3) goes on to say:

‘...The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate...’.

- IQ39.13. We consulted on the Stage 1 Screening Report, December 2023 (CSD04). For reasons explained above, we were not able to consult on the December 2024 AAR at the time of the Regulation 19 pre-submission publication period and it was not “appropriate” to consult on an incomplete assessment. The December 2024 AAR has now been published within the Examination Library and can be considered within the examination. As explained, a further consultation is envisaged on the completed AAR once it has been published. We consider that this will be “appropriate” consultation for the purposes of the Regulations.
- IQ39.14. Regulation 105(1) of the Habitats Regulations 2017 states that, where a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects), the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives. So for the JLP, the legal requirement is for South Oxfordshire and Vale of White Horse District Councils (as joint plan-making authorities) to have carried out an appropriate assessment in accordance with the Habitats Regulations and to be able to conclude that there will be no adverse effects on the integrity of a European Site before the plan is adopted.

IQ40 How has the Habitats Regulations Assessment and Appropriate Assessment informed the plan preparation and policy formulation process?

- IQ40.1. A Habitats Regulation Assessment (HRA) has been carried out of the Joint Local Plan in line with the Conservation of Habitats and Species Regulations 2017.
- IQ40.2. The Joint Local Plan HRA has been undertaken in two stages, the first of which is the screening stage. The screening assessment ([examination library reference CSD04](#)) was undertaken at the Regulation 18 stage of the Joint Local Plan and was published as part of the Preferred Options consultation ([examination library reference LPP04](#)). The second stage was the Appropriate Assessment ([examination library reference CSD04.1](#)), which was published for submission in December 2024.
- IQ40.3. All policies and site allocations within the Joint Local Plan were subject to screening for likely effects on European sites. This screening assessment concluded that the majority of proposed Joint Local Plan policies are unlikely to significantly affect a European site. It identified that some of the site allocations, as well as policy JT1: Meeting Employment Needs, may

affect European site. These likely significant effects included those related to atmospheric pollution, recreational disturbance and water quality and quantity.

- IQ40.4. The Appropriate Assessment further analysed the likely significant effects of the Joint Local Plan policies that were identified at the screening stage as a result of completion of further evidence studies (Water Cycle Study Scoping Report 2024 ([examination library reference CEQ18](#)) and Lowlands Fens study 2024 ([examination library reference NHL06](#)). The Appropriate Assessment identified no significant effects associated with water quality and quantity either alone or in combination with other plans and projects. However, air pollution effects could not be ruled out for Oxford Meadows SAC, Cothill Fen SAC and Aston Rowant SAC due to roads falling within 200m of these sites.
- IQ40.5. Additionally, due to the Dalton Barracks site allocation (Policy AS10) falling within 400m of Cothill Fen SAC, recreational disturbance effects could not be ruled out at the screening stage. However, taking into account mitigation measures incorporated within Policy AS10 (notably the green infrastructure provision), the Appropriate Assessment considered that there will be no adverse effects to the integrity of the European site.
- IQ40.6. Therefore, all impacts have now been resolved except for those relating to atmospheric pollution for Oxford Meadows SAC, Aston Rowant SAC and Cothill Fen SAC. As explained in IQ39, discussions with Natural England are currently underway to inform the scope of modelling work to inform the assessment of air quality effects. An update to the Appropriate Assessment Report will be published as soon as this work is complete. A public consultation will also be undertaken upon the publication of this update, and the results of the consultation will be provided to you for your consideration.

IQ41 Can the Councils provide an update on progress with the modelling work required to inform the assessment of air quality impacts on these European Sites and the timescale for a potential update to CSD04.1?

- IQ41.1. In light of Natural England's position regarding the need for further work to be undertaken to assess atmospheric pollution impact pathways in our HRA (Appropriate Assessment), we have been working closely with our appointed environmental advisers Urban Edge Environmental Consulting (UEEC) and Air Quality Consultants (AQC) and County Council transport planning technical leads on the preparation of a draft HRA Methodology Paper.
- IQ41.2. This draft paper explains how we have considered Natural England's advice (given verbally at meetings, through email exchanges and within their published 2018 HRA Guidance document and clearly sets out our

suggested approach to traffic and air quality modelling and the subsequent Appropriate Assessment of atmospheric pollution impacts on Oxford Meadows, Cothill Fen and Aston Rowant SACs.

- IQ41.3. We shared the draft methodology with the other Oxfordshire Local Planning Authorities on 24 January 2025, and following amendment to address comments received, we emailed a revised version of our HRA Methodology Paper to Natural England on 6 February 2025.
- IQ41.4. Once Natural England have reviewed the methodology and are happy to agree the suggested modelling approaches, we will be able to instruct AQC to carry out their air quality modelling, the results of which will inform further screening of air pollution effects, and Appropriate Assessment where the potential for likely significant effects is identified. We will also add the Methodology Paper to the Examination Library, when agreed.
- IQ41.5. The Appropriate Assessment itself will follow a series of steps as outlined in Section 5 of our Methodology Paper. We anticipate that all these steps (including botanical site surveys) will be complete in June (subject to Natural England's approval of the methodology), and that we will then be in a position to provide an update to CSD04.01 for the Examination, and to consult on the updated AAR in due course as discussed above.

IQ42 Will the scope of the modelling work on air quality involve any in-combination work in relation to plans and projects in neighbouring authorities?

- IQ42.1. Yes, all the Oxfordshire authorities are due to meet with Natural England in-person on 26 February 2025 to discuss and agree a joint county-wide approach to the assessment of in-combination atmospheric pollution impacts, specifically on the Oxford Meadows SAC.
- IQ42.2. See also response to IQ43 below – which explains the collaborative work that has already been undertaken by the Oxfordshire authorities in order to assess air quality impacts associated with planned development across the county.

IQ43 Can the Councils explain what is the purpose of this Explanatory Note? Is it likely to be submitted to the Examination? How will it affect the Plan being examined?

- IQ43.1 This Explanatory Note was prepared jointly by the Oxfordshire Districts and Oxfordshire County Council to help explain to Natural England our proposed county-wide approach to the cumulative assessment of impact from traffic flows associated with 2040-2042 local plans growth in Oxfordshire on the Oxford Meadows Special Area of Conservation (SAC). It demonstrated that cumulative impacts could be screened out from

further HRA assessment, as cumulative traffic flows were below screening thresholds².

- IQ43.2 The Note was refined over several weeks to reflect ongoing discussions and email exchanges between the council HRA policy leads and transport modelling specialists. It was then shared with Natural England for review on 5 November 2024 (with a revised version sent via email on 7 November as the cumulative impact totals in Table 1 were not correct in the original version).
- IQ43.3 Following our meeting on 6 November 2024 (see 06/11/2024 in [Appendix 1](#) and corresponding [114 Notes](#) in Appendix 2), Natural England confirmed (by email dated 28 November 2024 (see 28/11/2024 in [Appendix 1](#) and corresponding [120 Email](#) in Appendix 2) that they were unable to agree to the proposed approach outlined in the Explanatory Note because, at that time, they had not yet seen the supporting information/data to clarify how each district's figures had been reached, and consequently were not able to determine whether or not likely significant air quality impacts (arising from the JLP alone or in combination with other plans and projects) could be ruled out for Oxford Meadows SAC.
- IQ43.4 At a subsequent meeting with us on 4 December 2024 (see 04/12/2024 in [Appendix 1](#) and corresponding [121 Notes](#) in Appendix 2), Natural England further explained that they would like us to exclude all of Oxfordshire's adopted (but undelivered) planned development from our 2018 traffic model baseline. This differs from the approach outlined in the Explanatory Note, which was to assess the impact of traffic arising from the additional planned growth in the emerging local plans for South & Vale, Oxford City and Cherwell, treating existing allocated sites in adopted Oxfordshire local plans as being included in the baseline.
- IQ43.4 In light of the above, the Oxfordshire authorities have now taken the decision to revoke the Explanatory Note, however we have provided a copy of the Note alongside this response for your information. Instead, representatives from each district, the City and the county council are due to meet with Natural England on 26 February 2025 to discuss how best to approach the assessment of in-combination air quality impacts arising from planned development in Oxfordshire on Oxford Meadows SAC.

² 1,000 AADT for all vehicles and 200 AADT for heavy duty vehicles

IQ44 Are there any outstanding concerns from Natural England (or other representators) about the Habitats Regulations Assessment including the Appropriate Assessment? If so, what are they and what is being done to resolve them?

- IQ44.1. At Regulation 19, Natural England confirmed receipt of our draft Habitats Regulations Assessment (HRA) report and said that, whilst they looked forward to engaging further with the LPA on this matter in due course, they were not currently able to confirm whether they considered the Plan met the tests of soundness or legal compliance from an HRA perspective. Subsequently engagement on a Statement of Common Ground narrowed the matters raised by Natural England (see response to IQ39 above). Our ongoing engagement with Natural England to resolve issues around the assessment of in-combination traffic impacts has been discussed above.
- IQ44.2. Several developers (represented by the same agent) questioned why an HRA Appropriate Assessment had not been published alongside the Regulation 19 Joint Local Plan, and have specifically raised this issue in a letter arguing that the JLP should be withdrawn. We have responded to that letter explaining why the AAR was not published at Regulation 19 Stage, making the essential points set out in our response to IQ39 above.
- IQ44.3. Oxford City Council specifically mentioned that, in the absence of an HRA report, air quality impacts for Oxford Meadows, Cothill Fen and Aston Rowant SACs had not yet been assessed. This is explained in our response to IQ39 and 40 above. The steps being taken to address this are set out in our responses to IQ39 and 41 above.

IQ45 Are the Councils satisfied that the submitted Sustainability Appraisal (SA) meets the relevant legal requirements?

- IQ45.1. We are satisfied that the Sustainability Appraisal has been produced in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004.

IQ46 Are there any outstanding concerns raised in representations that the SA did not meet the relevant legal requirements and if so, what is the Councils response to this?

IQ46.1. There are two main outstanding legal compliance issues relating to the SA ([examination library reference CSD03](#)) that were raised in representations:

- a) Timeframe for the testing of reasonable alternatives; and
- b) Selection and testing of reasonable alternatives

IQ46.2. There was a third legal compliance issue, which we now consider has been fully addressed as a result of public consultation on a Technical Addendum to the SA Scoping Report ([examination library reference CSD03.1](#)), which commenced prior to Submission of the Plan for Examination.

IQ46.3. We have summarised the representations made on these three matters and provided our response to each below:

Timeframe for the testing of reasonable alternatives

IQ46.4. Several agents (on behalf of developers/landowners) expressed concerns that the assessment of 'reasonable alternatives' was undertaken late in the plan preparation process, rather than at an earlier stage where there would have been more opportunity for the findings of the SA process to influence the plan's development. Some considered that these sites were not treated as realistic potential alternatives to the allocated sites and that their assessment was merely a tick-box exercise to meet the regulatory requirements.

Councils' response

IQ46.5. Sustainability Appraisal is an iterative process broken down into five distinct stages (as illustrated in a [flow diagram within Government's PPG](#)).

IQ46.6. Stage B involves 'developing and refining alternatives and assessing effects', with four steps to follow, including:

- a) Step 2 - Development of the Local Plan options including reasonable alternatives; and
- b) Step 3 – Evaluation of the likely effects of the Local Plan and alternatives.

IQ46.7. The SA process runs in parallel with local plan preparation and the aforementioned flow diagram indicates that Stage B happens at around the same time as the Regulation 18 stage of plan making and prior to preparation of the publication version of the Local Plan. During public consultation on our Regulation 18(2) Preferred Options version of the JLP,

several respondents expressed concern that the SA had failed to test sufficient reasonable alternatives to the proposed site allocations. To address these concerns, we applied a series of site selection parameters and shortlisted 43 additional housing and employment sites which were subjected to SA. The SA findings were then considered by officers in order to determine the individual sustainability merits of allocating each site in the Plan as an alternative to our preferred sites.

- IQ46.8. The process followed, and the outcome of this assessment is described in paragraphs 2.42 to 2.49 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper ([examination library reference TOP07.1](#)) and the SA Report was updated at the Regulation 19 Publication stage to reflect the additional assessment work undertaken. Appendices H (the high level summary of the SA of the sites and alternatives) and I (the detailed SA of the sites and alternatives) of the publication version SA ([examination library reference CSD03](#)) contain the appraisal for these.
- IQ46.9. The SA appraised all 21 sites in the JLP that did not benefit a form of planning permission at Regulation 19 stage. It also assessed the 43 alternative employment and housing sites, and one alternative site boundary for the land at Dalton Barracks. These assessments were therefore available during the publication period of the proposed submission plan.
- IQ46.10. This process has allowed the submission version of the plan to be properly informed by SA. Reasonable alternatives have been considered and the results of consultation on the SA have been taken into account.
- IQ46.11. The outcome of assessing these 43 'reasonable alternatives' is described in paragraphs 2.42 to 2.49 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper ([examination library reference TOP07.1](#)) and the SA Report was updated at the Regulation 19 Publication stage to reflect the additional assessment work undertaken.

Selection and testing of reasonable alternatives

Spatial Strategy Options

- IQ46.12. Several developers, as well as Oxford City Council, expressed a view that the SA had not informed the decision-making process in a legally compliant way as not all reasonable alternatives to the preferred Spatial Strategy (Option A) had been considered.
- IQ46.13. Other spatial strategy options put forward by respondents as 'reasonable alternatives' to Options A to D were:

- Consideration of the potential for development on the edge of Reading/ close to the southern boundary of South Oxfordshire district.
- Additional testing of alternative housing requirement options (which itself would require further evidence to demonstrate alignment of jobs and housing in the JLP, for the SA to be able to make informed conclusions about the performance of the housing requirement options, particularly against SO1 and SO5).
- Provision of additional development at Tier 3 settlements (via an alternative spatial strategy option combining Options A and B).
- Incorporating elements of Options A and B, enabling greenfield sites on the edge of Tier 1, 2 and 3 settlements to be considered against criteria to ensure that the adverse effects of greenfield development in these locations were overcome.
- Including Tier 4 settlements in the option for greenfield expansion (Option B).
- An option that guides new development to Science Vale, the Garden Communities and to just Tier 1 Settlements (including selective greenfield sites around the Tier 1 Settlements).
- Another option that directs development to smaller sites in the more sustainable villages (Tier 4 settlements) in South and Vale, which would support the viability of existing services and facilities and help people shift towards more sustainable travel patterns.
- Assessing the option of releasing smaller, less sensitive Green Belt sites, either close to or on the edge of Oxford, to meet housing needs in sustainable locations, whilst reducing the need to travel and not impacting upon Green Belt purposes.
- Consideration of higher levels of housing growth to reflect anticipated changes in Government policy as indicated in the draft NPPF.

Employment Growth Options

- IQ46.14. Oxford City Council felt that the SA should have included an assessment of a reasonable suite of options appraising the ways different levels of

employment growth may give rise to different likely significant environmental effects. The SA should also have identified the effects from generating considerable additional housing need as a result of the employment strategy or considered the likely effects arising from the choice to plan, or indeed not plan, to meet this need.

Housing Requirement Options

- IQ46.15. One or two respondents suggested that the SA had taken an over-simplified approach to the assessment of the housing requirement options, and that only A and B really amounted to options for consideration (Option A = Standard method + Oxford's existing agreed unmet need; Option B = maintaining existing levels of housing need). Whilst they recognised that the SA could not possibly test all options, in their view it should have at least assessed reasonable alternatives at regular intervals between Options A and B to understand the maximum level of housing that the JLP could have delivered to respond to local housing needs.
- IQ46.16. By combining the assessment of housing requirement options for both South and Vale, these respondents also felt that the SA had not taken into account any area-specific considerations and failed to consider whether there was an opportunity to maximise growth in either district.
- IQ46.17. Another respondent said that alternative sources of housing supply capable of delivery in the early part of the plan period should have been assessed, and that this would have been a more robust approach to meeting housing requirements than simply re-allocating existing sites which have failed to show meaningful progress over successive Local Plan periods.

Councils' response

- IQ46.18. We had to exercise evaluative judgment to arrive at a range of 'reasonable' alternative options they considered should form the basis for assessment. We consider that we have identified an appropriate range of reasonable alternatives to our preferred spatial strategy, as well as alternative levels of housing and employment requirements, and the 43 reasonable alternative sites (for housing or employment development) which met our site selection parameters. In our view we have conducted a proportionate and robust assessment of the reasonable alternative options.
- IQ46.19. The detailed outcome of how each option or site performed against the SA objectives can be found in the Sustainability Appraisal (SA) and Appendices (Publication Version) ([examination library reference CSD03](#)).

- IQ46.20. Summaries of these outcomes can also be found in paras 3.32 to 3.33 of the Spatial Strategy Topic Paper ([examination library reference TOP8.2](#)), and paras 2.42 to 2.49 of the Site Selection (incorporating Sequential Flood Risk and Exception Test) Topic Paper ([examination library reference TOP07.1](#)). paras 4.1 to 4.5 of the Employment Needs Topic Paper ([examination library reference TOP02.2](#)).
- IQ46.21. Please see also our response to IQ51.

Failure to assess likely evolution of the current state of the environment without the JLP

- IQ46.22. Oxford City Council commented that the SA appeared to be lacking any discussion of the likely evolution of the current state of the environment without the implementation of the JLP, which was a legal requirement under the SA/SEA Regulations and necessary information to fully understand the likely impacts arising from implementation of the JLP.

Councils' response

- IQ46.23. We published an SA Technical Addendum for public consultation between 6 December 2024 and 17 January 2025 ([examination library reference CSD03.1](#)) that addresses this matter. Please see responses to IQ49 and IQ50 regarding the outcomes of this consultation.

IQ47 How has the SA informed and influenced the preparation of the Local Plan at each stage?

- IQ47.1. The Joint Local Plan has been informed by the Sustainability Appraisal process. This process identifies and considers the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising positives.
- IQ47.2. The Sustainability Appraisal process was iterative, and undertaken alongside the Joint Local Plan's preparation, publication and submission.
- IQ47.3. An initial Sustainability Appraisal (SA) Screening and Scoping Report was published alongside the Issues Consultation ([examination library reference LPP09](#)).
- IQ47.4. Using the feedback we received from the Issues Consultation, and the evidence we had gathered, officers began drafting policy text, and alternative approaches throughout 2023. We then shared these drafts with our SA consultant, UEEC. UEEC then subjected the policy wording and alternatives to a "first round" of SA over the summer of 2023, and provided feedback on the draft policies. Officers met with UEEC to talk through

findings, as well as exchanging draft text and commentary via email. This feedback, where relevant directly inputted into the further drafts of policies and alternatives, which officers in turn shared with UEEC for another round of SA.

- IQ47.5. Officers then finalised the policy wording and alternative options, which were subject to the final SA for the preferred options consultation ([examination library reference LPP03](#)), which provided a detailed analysis of each policy option against the SA objectives. We also provided an interactive version of the Non-Technical Summary to provide an accessible and engaging format, using interactive mapping, this can be viewed online at: <https://arcg.is/PPPD8>.
- IQ47.6. Similarly, when reviewing comments from the preferred options consultation and the evidence gathered since, officers began finalising policies for the pre-submission publication version plan. We followed the same process of sharing a draft policy with UEEC ahead of finalising policies for the publication period.
- IQ47.7. The SA process assisted in confirming our preferred policy options, and resulted in specific mitigation measures identified in the SA being proposed in the plan ([examination library reference CSDO3](#), Table 7.1, p.53), for example:
- a) Linked to SA Objective 1: To reduce pollution of all kinds and meet environmental targets for air and water, the SA recommended a mitigation measure requiring Construction Environmental Management Plans (CEMP), with associated investigations for air quality, contaminated land, and other forms of pollution (See Policies LS1: Proposals for large scale major development, CE9: Air quality, CE10: Pollution sources and receptors, CE11: Light pollution and dark skies and CE12: Soils and contaminated land)
 - b) Linked to SA Objective 3: To reduce the need to travel by car, and improve access to services and facilities by sustainable modes of travel, the SA recommended a mitigation measure requiring the maximisation of sustainable transport (See Policies AS1 to AS12 and AS16: site allocations, SP3 to SP9: The Strategies for Didcot Garden Town, Abingdon, Faringdon, Henley on Thames, Thame, Wallingford and Wantage, Policy IN2: Sustainable transport and accessibility)
 - c) Linked to SA Objective 5: To make a significant contribution to achieving net zero carbon emissions in both Districts and to promote adaptation and resilience to climate change, the SA recommended a mitigation measure for sustainable drainage measures, to demonstrate how flooding from all sources (including

surface water run-off) will be attenuated to avoid increasing flood risk on site or in surrounding area.
(See Policy CE6: Flood risk)

- IQ47.8. The Sustainability Appraisal (SA) and Appendices (Publication Version) ([examination library reference CSD03](#)) were consulted on at Regulation 19 stage and have been submitted for examination. Finally, the Sustainability Appraisal (SA) Technical Addendum to Scoping Report ([examination library reference CSD03.1](#)) was consulted on between December 2024 and January 2025 and has also been submitted for examination.

IQ48 How has it been recorded/reported and is it available to the Examination?

- IQ48.1. The initial Sustainability Appraisal (SA) Screening and Scoping Report was published alongside the Issues Consultation ([examination library reference LPP09](#)).
- IQ48.2. The Sustainability Appraisal (SA) and Appendices ([examination library reference LPP03](#)) was published at Preferred Options which provided a detailed analysis of each policy option against the SA objectives.
- IQ48.3. The publication version of the Sustainability Appraisal (SA) and Appendices (Publication Version) ([examination library reference CSD03](#)) were consulted on at Regulation 19 stage and have been submitted for examination. The Sustainability Appraisal (SA) Technical Addendum to Scoping Report ([examination library reference CSD03.1](#)) was consulted on between December 2024 and January 2025 and has also been submitted for examination.
- IQ48.1. The exchanges we had with UEEC took the form of various meetings, working on cloud-based documents and email exchanges of draft policies and alternatives. As these took the form of draft / constantly updating documents, we haven't included these in the examination library.

IQ49 When will the consultation responses [relating to the SA Technical Addendum] and any commentary from the Councils be available for the Examination?

- IQ49.1. All the responses to the SA Technical Addendum consultation have now been published on our website and are available to view via this link:
www.southandvale.gov.uk/JLP_Technical_Addendum_Responses
- IQ49.2. We received 44 representations in total during the consultation period (which ran from 6 Dec 2024 to 17 Jan 2025). Of these, 6 respondents expressed support for the Addendum and 3 said they had no comments to make on the document.

IQ49.3. Around half of the 44 responses comprised specific comments or observations on the detail in the Addendum. Each individual response has now been reviewed by officers and we consider that the main issues raised are as follows:

- The likely evolution of the baseline is summarised, but an analysis of the impact is not forthcoming.
- Some of the suggested baseline outcomes will be unlikely in instances where national planning policy and/or development management processes would take precedence.
- The JLP's restrictive approach to housing development would lead to more, not less speculative development contrary to the outcomes cited in the Addendum.
- The SA Addendum ([examination library reference CSD03.1](#)) should consider additional scenarios/outcomes to the 'do-nothing' scenario including the social/economic benefits resulting from options for strategic planning across Oxfordshire and increased housing supply by calculating housing need using the new standard method.
- The Addendum should acknowledge that without the JLP opportunities to address issue or maximise benefits across a number of policy areas may be lost.
- Additional indicators were suggested against a number of the SA objectives for consideration through the evolution of the baseline. It was also suggested the outcomes would have impacts beyond those indicators identified.
- Some of the negative outcomes identified could be mitigated by other means outside of the JLP.
- Concern was raised about the timing of public consultation on the Addendum and questioned whether the councils had provided a genuine opportunity for public engagement on its contents and for this to effectively inform the appraisal of the alternative strategy options, sites and policy approaches.
- Concern was also raised that without having established how the current baseline would evolve at the outset of the SA process, the councils could not have fully assessed the net sustainability impacts of the Joint Local Plan at the point of submission.

Councils' commentary

- IQ49.4. By publishing and consulting on the Technical Addendum to the Sustainability Appraisal Scoping Report we have complied with the regulatory duties in accordance with Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- IQ49.5. We have reviewed each of the responses received and carefully considered their content in identifying the main issues summarised above. While noting the points made, we do not consider these require any updates to be made to the Technical Addendum. Further we do not consider the responses require a change in the content of the Joint Local Plan as submitted.

IQ50 Are there any implications from this Technical Addendum for the Examination?

- IQ50.1. Please refer to our response to IQ49 above. We do not consider that there are any implications arising from public consultation on our Technical Addendum to the SA Scoping Report for the Examination.

IQ51 What were the reasonable alternatives considered in the preparation of the Plan in terms of:

(a) the amount of housing, economic and other development to be accommodated? and

(b) the spatial strategy for accommodating that development, including the settlement hierarchy?

- IQ51.1. The Sustainability Appraisal (SA) for the Publication Version of the JLP ([examination library reference CSD03](#)) sets out how we have assessed reasonable alternatives to the proposed spatial strategy and levels of growth in the plan.
- IQ51.2. Table 4.3 Spatial Strategy Options of the SA (page 17, pdf page 29) sets out the four alternatives we considered for the spatial strategy:
- Option. a. This is the proposed strategy, focussing development in Science Vale, the Garden Communities, and in the higher tier settlements
 - Option. b. Focussing development on greenfield expansion of Tier 1 to 3 settlements.
 - Option. c. Co-locating housing and employment, including development on greenfield land
 - Option. d. A more dispersed pattern of development including at smaller villagers (Tier 4 settlements).
- IQ51.3. Table 4.4 Housing requirement options of the SA (page 19, pdf page 31) sets out the four alternatives we considered for the JLP:
- Option. a. This is the proposed strategy, using the Standard Method, with an increase to allow for existing agreed unmet need from Oxford City. This equates to 16,530 homes in South Oxfordshire, and 14,490 homes in the Vale of White Horse.
 - Option. b. Maintain existing levels of housing need. This equates to 20,450 homes in South Oxfordshire, and 22,394 homes in the Vale of White Horse.
 - Option. c. Using only the standard method / local housing need for each district. This results in a need of 12,100 homes for South Oxfordshire, and 12,560 homes for the Vale of White Horse.
 - Option. d. Reflecting the Oxfordshire Growth Deal in a new housing needs assessment. There is no defined need for this option, but it is likely to be similar to option b.

- IQ51.4. The Preferred Options Sustainability Appraisal ([examination library reference LPP03](#), Appendix L, page 19, pdf page 254), published alongside the Employment Land Needs Assessment (ELNA) Phase 1 in January 2024 ([examination library reference HES08](#)), assessed the options of planning for the level of employment land need identified by ELNA phase 1:
- Option. a. hybrid approach using the demand/past take-up scenario – the preferred approach of the plan.
 - Option. b. a labour demand scenario which is based on employment forecasts from Oxford Economics;
 - Option. c. a past take-up scenario that considers historical employment land take up rates and projects the trends forward; and
 - Option. d. a labour supply scenario that uses population forecasts to understand the level of additional workforce that needs jobs.

- IQ51.5. The table below presents the employment land requirements generated by the four scenarios, sourced from data in the ELNA tables 8-19 and 8-21.

Table IQ51.1: Employment land requirement scenarios

	a) Preferred option Hybrid approach	b) Labour demand scenario	c) Past take up scenario	d) Labour supply scenario
Office (ha)	29.1	29.1	24.3	9.5
Industrial (ha)	20.2	-13.2	20.2	-26.9
Total* (ha)	49.3	15.9	44.4	-17.5

*Note: the figures do not always sum due to rounding.

- IQ51.6. With regard to retail floor space needs, our Town Centres and Retail Study ([examination library reference HES22](#), see executive summary paragraphs 9-10) did not indicate any quantitative need for new retail floorspace. Furthermore, we have received no representations indicating there is a quantitative need. Therefore, we could not identify any other quantitative need as reasonable alternatives to test through SA.

IQ52 Was a higher housing growth option considered during the plan preparation process?

- IQ52.1. The Preferred Options (Regulation 18, Part 2) consultation document ([examination library reference LPP01.1](#)) sets out the alternative options to housing growth on pages 142 to 145. These three alternatives to the proposed housing requirement include two options that would likely have resulted in a higher housing growth option. The final option included a housing requirement that is lower than that in the proposed plan.
- IQ52.2. Option B (maintaining existing levels of housing need) would have resulted in a housing need for each council. For South Oxfordshire it would have resulted in a housing need of circa 20,450 homes (around 24% higher than the 16,530 in HOU1), and 22,394 for the Vale of White Horse (around 55% higher than the 14,490 in HOU1).
- IQ52.3. Option D (reflecting the Oxfordshire Growth Deal in a new housing need assessment) also tested an option that was likely higher than the proposed housing requirement in the JLP.
- IQ52.4. The proposed submission Sustainability Appraisal (SA) ([examination library reference CSD03](#)) shows how we tested these options against the sustainability framework (Appendix G, Table 1.2, pdf page 136). The SA accompanying the preferred options consultation also tested these alternatives ([examination library reference LPP03](#), Appendix G, Table 1.2, pdf page 124).

IQ53 What are the Councils' strategic priorities for the development and use of land in the joint plan area?

- IQ53.1. The strategic priorities are set out in the objectives of the plan (CSD01 para 3.7 on pages 27 to 29). These cover a range of matters as follows:
- “3.7 The vision above shows how we'd like the districts to be. Next are the objectives for the Joint Local Plan, which take us a step closer to policy options:
- Obj1. Create a unified set of policies for South Oxfordshire and Vale of White Horse, retaining the best from each previous local plan and building in the latest thinking to create an ambitious and fresh joint plan, which sets a framework for successful neighbourhood plans.
- Obj2. Help transition to net zero carbon districts by 2030 for South Oxfordshire and 2045 for Vale of White Horse, mindful of the districts' carbon budgets, by locating new housing and employment development in places which minimise the need to travel by private car, requiring buildings to be designed to the highest achievable standards for reducing energy

and water use, encouraging suitable renewable energy generation, and supporting nature-based carbon and stormwater storage.

Obj3. Strengthen resilience to climate change by designing new buildings and infrastructure in our districts and retrofitting existing ones to withstand extreme weather events, such as flash floods, longer slow flood events and heat waves, and implementing nature-based solutions like planting street trees.

Obj4. Help nature recover by protecting wildlife and expanding natural habitats, requiring developments to achieve the highest viable net gain in biodiversity so that it leaves the natural environment better than it was before the development.

Obj5. Focus new allocations of land for development at well-located brownfield sites, recycling land that is already developed, using land efficiently and re-using buildings and materials rather than expending new resources.

Obj6. Help communities lead healthy and more active lifestyles, by providing high-quality greenspace, promoting safe and active travel, and controlling air, water, light and noise pollution from new developments, so that people and nature can be safe, healthy, and thriving. Obj7. Cherish and protect natural and built heritage, with policies that make sure the location and design of development respects landscape character and the local distinctiveness of towns and villages. Obj8. Plan for enough new homes to meet our needs, including significant numbers of homes that are genuinely affordable to rent or buy, and different kinds of homes to meet the needs of our communities, including older people, those with care needs and younger people getting their first home

Obj9. Plan for enough new jobs, a flourishing local economy, and a wide range of jobs, not only in the science and innovation sector for which the districts are well known, but in the foundational economy which underpins this and provides people's day to day needs.

Obj10. Ensure that new developments create great places and great communities that make our districts better, leaving a positive legacy for the future.

Obj11. Plan for infrastructure in the right places and built at the right times to serve our growing communities, like transport, water, sewerage, energy, and digital networks, along with health, education, and cultural facilities.

Obj12. Help create and sustain communities by protecting community facilities and supporting new local facilities that help residents live healthier, more active, sustainable lifestyles without the need to rely on cars."

- IQ53.2. These underpin the strategy of our plan and its policies. They are given spatial expression through the spatial strategy at Policy SP1 which sets out what should happen in different locations e.g. in the National Landscapes, in Science Vale, at the Garden Communities, on brownfield sites, in the countryside etc.
- IQ53.3. If helpful for clarity, we would be open to re-naming the 'objectives' as 'strategic priorities' through a proposed modification.

IQ54 Appendix 2 of the Plan identifies 101 out of a total of 105 policies to be strategic, leaving only 4 policies deemed to be non-strategic. Do each of the 101 policies meet the criteria for strategic policies set out in national policy and guidance?

- IQ54.1. The methodology used to determine if a policy is strategic is set out Appendix 2 of the submitted Plan ([examination library reference CSD01](#)). As explained in paragraphs A2.1 to A2.6 of Appendix 2, national policy and guidance is key to identifying local plan policies as strategic or non-strategic. The Neighbourhood Planning Guidance within the PPG³ identifies seven considerations for reaching a view on whether a policy is strategic. Each policy in the Joint Local Plan was assessed against these considerations, any that met one or more of these considerations was deemed to be a strategic policy.
- IQ54.2. On this basis, we consider that each of the 101 policies identified in Appendix 2 as strategic meet the criteria identified in paragraph A2.5 of Appendix 2.

³ Paragraph 076 Reference ID: 41-076-20190509

IQ55 Section 5 of the HNA (HES15.1) sets out the joint housing need for both Councils based on the Standard Method in accordance with the NPPF utilising 2014-based household projections. Paragraph 5.6 states that in assessing the appropriate mix of housing, it is necessary to establish demographic projections to align with the number of homes identified by the standard method. The HNA has, therefore, undertaken demographic projections based on the latest official projections. It has utilised a 10-year migration trend variant of the 2018 based household projections, adjusted to take account of the Census 2021 and mid-year population estimates. Paragraph 5.7 then goes on to explain how the model aligns this recent trend household growth with the LHN target. Is the method used to align the two approaches appropriate?

- IQ55.1. Prior to December 2024, the standard method utilised a combination of the 2014-based household projections, and an uplift factor derived from the ratio of median house prices and workplace-based incomes in the local authority. This provides a local housing need figure of 605 dwellings per annum in South Oxfordshire and 628 dwellings per annum in Vale of White Horse.
- IQ55.2. However, there is no suggestion within PPG that 2014-based household projections should be used for the modelling of specialist housing need, such as housing for older people, or affordable housing. Paragraphs 2.9-2.12 of the Joint Housing Needs Assessment (JHNA) ([examination library reference HES15.1](#)) explore the reasons for setting aside the 2014-based household projection's headship rates as the basis for projecting future household growth.
- IQ55.3. Paragraph 5.7 of the JHNA explains why a combination of the 2018-based household projections, the 2021 Census, and subsequent mid-year population estimates provide a much more up to date set of mortality, fertility and household formation rates. Therefore, they represent the best estimates for future household growth based upon past trends.
- IQ55.4. However, as also noted in paragraph 5.6 of the JHNA, it is necessary to adjust the household projection trends to match the dwelling need set out in the standard method for local housing need, to ensure that the housing mix is based on the higher level of need which is derived from use of the standard method. The first adjustment returns household formation rates for those aged under 45 years to their 2001 levels, which was a high point for household formation rates. The resulting outputs therefore provide a projected household growth based on population growth trends and a return to higher rates of household formation.
- IQ55.5. For both South Oxfordshire and Vale of White Horse, this is insufficient to match the overall standard method for local housing need. Therefore, we have assumed a higher level of migration than is to be found in the 10 year migration data. This sees extra households move to both local authorities

to ensure that the total number of households is sufficient to match the overall housing need figure.

- IQ55.6. We would note that using the 2014 based household projections would require us to also assess the impact of the affordability uplift with a similar set of assumptions. Similarly, this would initially return household formation rates to their 2001 levels, and then increased migration would have been required to match the standard method for local housing need.
- IQ55.7. The JHNA therefore takes an appropriate approach by assessing specialist housing need using more up to date evidence on demographic trends, then aligning this with the overall higher housing needs established through the standard method.

IQ56 Paragraph 4 of the Executive Summary of the HNA states that the “Employment Land Needs Assessment yielded a projected jobs growth for both areas which is consistent with achieving a balance between the number of workers in the areas and the number of jobs when sustainable commuting flows have been allowed for. There is no requirement for a higher dwelling target to accommodate the projected workforce”. How has this conclusion been arrived at?

- IQ56.1. We have responded to IQ56 and IQ57 (What evidence is there to support this assumption?) together.
- IQ56.2. Paragraph 1.6 of the Joint Housing Needs Assessment (JHNA) ([examination library reference HES15.1](#)) states that:

“We would also note that a concurrent Employment Land Needs Assessment was undertaken for both local authorities. This yielded a projected jobs growth of 15,344 for the two local authorities combined. This level of jobs growth is consistent with achieving a balance between the number of workers in the areas and the number of jobs when sustainable commuting flows have been allowed for when considering the full projected supply of housing in the areas from the standard method and unmet need from Oxford City. Therefore, there is no requirement for a higher dwelling target to accommodate the projected workforce.”

- IQ56.3. The figure of 15,344 jobs⁴ is derived from Oxford Economics data on forecast employment across all industries identified in the Employment Land Needs Assessment (ELNA) Phase 1 ([examination library reference](#)

⁴ The ELNA derived this figure from Oxford Economics data – as these forecasts are currently only provided up to 2040, a final year of growth (in 2041) has been extrapolated at the same rate of growth as the preceding years.

[HES08](#), paragraph 8.11 / table 8-2) and relates solely to full-time equivalent workers.

- IQ56.4. For the purposes of the JHNA, the key jobs number is how many additional workers, not how many full-time jobs are required. Using the same Oxford Economic data from May 2023, the total job growth is forecast to be 17,396. However, some people hold more than one job, so the Oxford Economics data requires 16,082 workers to fill the forecasted jobs growth.
- IQ56.5. Therefore, the key question is, given a combined housing requirement of 31,020 for South Oxfordshire and Vale of White Horse, will this generate an additional 16,082 workers?
- IQ56.6. Our consultants have modelled future economic activity rates based upon localising the rates used nationally by the Office for Budget Responsibility. These take account of the projected growth in older persons in the labour market as pension ages change and also growing rates of women in the labour market. We have also considered the impact of in and out-commuting and of changes to the number of persons unemployed. The JHNA uses the 2011 Census data for commuting, not the 2021 Census data, because the 2021 Census occurred during the pandemic with significant numbers of people working from home. Therefore, commuting patterns were not typical.
- IQ56.7. Table 56.1 below sets out the calculation of the required workforce in South Oxfordshire and Vale of White Horse to support a growth of 16,082 workers. In summary:
- a) South Oxfordshire and Vale of White Horse require 16,082 more workers based upon Oxford Economics May 2023 data.
 - b) 30.6% of jobs in South Oxfordshire and Vale of White Horse are filled by in-commuters⁵, so if this rate continues this will provide 4,916 of the workers.
 - c) The Oxford Economics data shows an unemployment rate of 2.6% in 2021 and we have held that constant, so as the workforce grows this will yield an additional 302 unemployed persons.
 - d) 35.4% of South Oxfordshire and Vale of White Horse workers out-commute and holding this rate constant will require an additional 6,272 out-commuting workers.
 - e) Overall, to provide for 15,344 full-time equivalent jobs will require 16,082 additional workers which in turn will require 17,740 additional economically active persons (16,082 – 4,916 + 302 +6,272)

⁵ Census 2011: Location of usual residence and place of work by method of travel to work. Available at <https://www.nomisweb.co.uk/census/2011/wu02uk>

- f) Modelling of the housing requirement of 31,020 dwellings shows that these will yield an additional 22,293 economically active persons⁶.

IQ56.8. Therefore, as an overall conclusion, the JLP housing requirement will yield a surplus of 4,553 economically active persons compared with what is required to support the forecast job growth. Therefore, the housing requirement is more than fully consistent with the jobs growth forecast for South Oxfordshire and Vale of White Horse and does not require any upward adjustment to accommodate such growth.

Table 56.1 Relationship between job and housing growth

A	Workforce needed	16,082
B	Commute in rate	30.6%
C	Additional workforce commuting into South Oxfordshire and Vale of White Horse (AxB)	-4,916
D	Resident workforce needed (A+C)	11,166
E	Unemployment rate	2.6%
F	Economically active persons – unemployed (DxE)	+302
G	Economically active persons needed (D+F)	11,468
H	Out-commute rate	35.4%
I	Additional workforce commute out of South Oxfordshire and Vale of White Horse (GxH)	+6,272
J	Total economically active persons required (G+I)	17,740
K	Number of additional economically active persons at housing requirement of 31,020	22,293
L	Net surplus of workers at the housing requirement (K-J)	+4,553

⁶ The modelling for economic activity rates contains a different rate for each age group and gender and these change over time in line with the rates used nationally by the Office for Budget Responsibility. Therefore, there is not one economic activity rate used, it will change each year depending upon the age and gender profile of the population

IQ57 What evidence is there to support this assumption?

IQ57.1. Please see our response above, which provides the evidence to support these assumptions.

IQ58 The Plan seeks to continue to meet the agreed unmet housing needs of Oxford City by the inclusion of an annualised figure. Does the Plan make provision to meet the agreed unmet housing needs in full, bearing in mind the base date of the Plan and previous delivery?

- IQ58.1. Yes, we plan to meet the agreed unmet need in full. For South Oxfordshire, the JLP uplifts its housing requirement by 4,950 homes from 2021. This accommodates all the agreed unmet from Oxford for South Oxfordshire in its Local Plan 2035 ([examination library reference ALP01](#)).
- IQ58.2. For the Vale of White Horse, the JLP uplifts its housing requirement by 1,830 homes from 2021. This is part of the 2,200 homes that the Vale of White Horse District Council agreed to accommodate from Oxford City Council in its Local Plan 2031 Part 2 (LPP2) ([examination library reference ALP04](#)). The LPP2 uplifted its housing requirement between 2019 and 2031 to address this extra need. Therefore, two years of this need (370 homes) were delivered prior to the start of the JLP period.
- IQ58.3. In these two years (2019/20 and 2020/21), the Vale of White Horse's adopted local plan requirement was 1,028 homes (the District's own needs) plus 183 homes (for Oxford). The total requirement for those years was 2,422 homes (or 1,211 per annum). The total housing completions for those years was 2,707, which is a surplus of 285 homes. No further additional homes therefore need to be added to the housing requirement for the JLP.

Table 58.1 Housing requirement (incorporating the agreed unmet housing need for Oxford) and completions in the Vale of White Horse 2019/20 and 2020/21

Year	Housing requirement	Housing supply	Difference
2019/20	1,211	1,598	+387
2020/21	1,211	1,109	-102
Total	2,422	2,707	+285

- IQ58.4. The JLP therefore accommodates, in full, the local housing need for each authority, plus the agreed unmet need in adopted local plans from 2021 onwards.

IQ59 As the Plan does not include a separate trajectory of the Oxford City unmet need how is it intended to monitor progress in delivering that unmet need?

- IQ59.1. Neither the NPPF nor the PPG require local authorities to identify agreed unmet need as separate from their overall housing requirement, in fact NPPF (December 2023) paragraph 61 is clear that unmet needs should be taken into account in establishing “the amount of housing to be planned for”, implying that they should be aggregated with local housing need (LHN) in a single requirement (and therefore monitored accordingly).
- IQ59.2. The JLP proposes to continue the approach in the adopted local plans for our districts not to ringfence Oxford’s unmet need. This approach was found sound in both adopted local plans. This means that the plan uplifts the housing requirement to accommodate the agreed unmet need and steps our housing requirement accordingly to deliver within the agreed timescales. The uplift does not form a discrete, separate element of our housing requirement.
- IQ59.3. Similarly, in terms of housing supply, the plans do not ringfence housing sites for addressing unmet need.
- IQ59.4. There are some sites within each district that have a stronger geographical relationship with Oxford (see Table 59.1 below). On these sites, the councils have signed memoranda of understanding regarding the operation for addressing the affordable housing element of Oxford City’s unmet housing need (examination library reference [HES19](#) (Vale) and [HES20](#) (South)).

Table 59.1 Housing sites with a stronger geographical relationship to Oxford

District	Site name and JLP reference	Total homes	Status
South Oxfordshire	AS3: Land South of Grenoble Road, Edge of Oxford	3,000	Existing & proposed allocation
	AS4: Land at Northfield, Edge of Oxford	1,700	Existing & proposed allocation
	AS5: Land at Bayswater Brook, Edge of Oxford	1,513*	Existing & proposed allocation – resolution to grant outline planning permission
Vale of White Horse	HOU2n: North Abingdon-on-Thames	800	Existing & proposed allocation – under construction
	HOU2v: North-West of Abingdon on Thames	200	
	HOU2i: North-West Radley	240	
	HOU2j: South of Kennington	270	
	AS14: Dalton Barracks	2,750	Existing & proposed allocation

** Bayswater Brook has received resolution to grant outline planning permission for 1,450 new C3 dwellings, and 120 units of assisted living. This totals 1,570 residential properties across the site. We have applied a census-based ratio of 1.9 to the assisted livings. This means that for every 1.9 units of this accommodation built equates to 1 dwelling for housing land supply purposes. 120 units equates to 63 dwellings. Added to the 1,450 c3 dwellings, makes the 1,513 in the trajectory.*

- IQ59.5. However, for market housing there is no way of controlling which households will move onto specific sites – whether they are from within the plan area or not.
- IQ59.6. Furthermore, if we did want to monitor this supply separately it would mean Oxford's unmet need would need to be identified as a distinct, separate housing requirement. Sites identified to meet that need, would also need to be separated from the rest of each district's housing supply. On the positive side, this would mean that if these sites failed to come

forward, it would not have an impact on the housing land supply position in the rest of the districts.

- IQ59.7. However, in such a scenario, it is unclear how, or where, the presumption in favour of sustainable⁷ development would apply. A spatial area that could be identified within planning policies would likely include large areas of Green Belt land to maintain a strong geographical relationship with Oxford. In the Green Belt national and local planning policies consider new development to be inappropriate in most circumstances, and so this would unlikely yield significant numbers of new homes.
- IQ59.8. For these reasons, we do not consider it effective or necessary to monitor this element of the requirement, or these sites separately. However, as set out in our 5 year land supply statements (examination library reference [OCD09](#) and [OCD10](#) for Vale of White Horse and South Oxfordshire respectively), we do provide a site by site break down of actual and expected housing delivery – along with a commentary on the key issues affecting delivery.

IQ60 How does the requirement for Gypsy and Traveller pitches and Travelling Show Person plots compare to the previous GTAA/evidence of need?

- IQ60.1. The need identified in the GTAA 2024 ([examination library reference LPA01](#)) represents significant increase on the need identified for gypsy and traveller pitches when compared to our previous study the GTAA 2017 ([examination library reference HES13](#)), as shown in table IQ60.1 below.

Table IQ60.1: Comparison between the need identified for gypsy and traveller pitches in the 2017 GTAA and the 2024 GTAA

	South Oxfordshire		Vale of White Horse	
	2017 GTAA (2017 to 2033)	2024 GTAA (2023/24 to 2041/42)	2017 GTAA (2017 to 2032)	2024 GTAA (2023/24 to 2041/42)
1) Household who met the planning definition	9	48 to 68	2	24 to 40
2) Households who travelling status was unknown (interview not possible)	(0 to 5) 10% = 1	n/a	(0 to 4) 10% = 0	n/a
3) Households who did not met the travelling definition	8	n/a	0	n/a
Total	10	48 to 68	2	24 to 40

⁷ Contained within Paragraph 11 of either the NPPF 2023 or NPPF 2024.

- IQ60.2. While the two studies are broadly similar in how they approach assessing the need for pitches, there are a number of differences between the two assessments which impact the identified need for pitches. Firstly, the assessments were completed by different consultants with different methodologies, undertaken 7 years apart, they cover a different time period and were completed within a changing national policy framework.
- IQ60.3. The previous GTAA 2017 ([examination library reference HES13](#)) was carried out in accordance with the 2015 Planning Policy for Travellers Sites (PTTS) definition of a traveller. It identified pitch needs from households in three categories. These were: households who met the planning definition of a traveller, households whose travelling status was unknown (interview not possible) and while not a requirement of the 2015 PPTS, it also identified the needs of households who did not travel and therefore did not meet the planning definition of a traveller. Only household pitch needs identified in row 1 and a proportion (10% based on national evidence on the proportion of travellers who may meet the definition) of household pitch need identified in row 2 of table IQ60.1 formed the Councils' locally set pitch targets. This resulted in a need for 10 pitches in South and 2 pitches in Vale up to 2033 and 2032 respectively ([examination library reference HES13](#), see figures 3 and 4).
- IQ60.4. The 2024 GTAA ([examination library reference LPA01](#), paragraphs 2.16 to 2.18) assesses a single cultural need for gypsy and travellers, rather than applying the nomadic way of life test set out within annex 1 of the 2015 PPTS. The 2024 GTAA in identifying the need for pitches considers the need for pitches resulting from four variant scenarios, this results in an upper and lower potential pitch need for the Councils.
- IQ60.5. The principal scenario (A1) identifies a potential pitch need of 68 pitches in South and 40 pitches in Vale, while at the other end of the scale, scenario B2 identifies a lower potential pitch need of 48 in South and 24 in Vale ([examination library reference LPA01](#), see table 7.12). The scenarios (A1, A2, B1 and B2) use different assumption on in-migration (within first five years) and household formation (after the first five years) which result in varying levels of pitch need. More detail on the assumptions used within each scenario are set out within paragraphs 7.42 and 7.46 of the GTAA ([examination library reference LPA01](#)).
- IQ60.6. For the purposes of providing a direct comparison between the identified need for pitches in both studies, tables IQ60.2 and IQ60.3 below sets out the cumulative need for pitches resulting from identifying a single cultural need for pitches in the 2017 GTAA. This is then compared with the need identified under each scenario in the 2024 study.

Table IQ60.2 comparison of cultural need for pitches in South Oxfordshire between the 2017 GTAA and 2024 GTAA

	2017 GTAA (2017 to 2033)	2024 GTAA (2023/24 to 2041/42) South Oxfordshire			
		Scenario A1	Scenario A2	Scenario B1	Scenario B2
Cultural need for pitches	22	68	48	67	48

Table IQ60.3 comparison of cultural need for pitches in Vale of White Horse between the 2017 GTAA and 2024 GTAA

	2017 GTAA (2017 to 2032)	2024 GTAA (2023/24 to 2041/42) Vale of White Horse			
		Scenario A1	Scenario A2	Scenario B1	Scenario B2
Cultural need for pitches	6	40	29	35	24

IQ60.7. Tables IQ60.2 and IQ60.3 show a significant increase in the need for pitches between the 2017 GTAA and the 2024 GTAA, even where the lowest estimated need in scenario B2 is compared to the need identified in the 2015 GTAA.

IQ60.8. In relation to travelling showpeople, the identified need for plots identified the 2024 GTAA did not increase significantly above the need identified within the 2017 GTAA, as shown below in table IQ60.4.

Table IQ60.4 Comparison between the need identified for travelling showpeople plots in the 2017 GTAA and the 2024 GTAA

	South Oxfordshire		Vale of White Horse	
	2017 GTAA (2017 to 2033)	2024 GTAA (2023/24 to 2041/42)	2017 GTAA (2017 to 2032)	2024 GTAA (2023/24 to 2041/42)
Plots for Travelling Showpeople	0	4	0	0

IQ60.9. In South Oxfordshire the 2017 GTAA did not identify a need for additional plots for travelling showpeople up to 2033 ([examination library reference HES13](#), see figure 7), four plots are identified in the 2024 study as being required up to 2041/42 ([examination library reference LPA01](#), see table 8.3). In Vale both the 2017 GTAA ([examination library reference HES13](#),

figure 8) and 2024 GTAA identify a zero plot requirement for travelling showpeople ([examination library reference LPA01](#), see table 8.3).

- IQ60.10. The 2024 GTAA also assessed the accommodation needs of boat dwellers in Oxfordshire, which were not covered in the 2017 GTAA. The GTAA ([examination library reference LPA01](#), paragraph 9.30) confirmed in relation to additional residential moorings that no specific needs were identified in South Oxfordshire or Vale of White Horse.

IQ61 Can the requirement identified in the GTAA 2024 be accommodated on existing sites and sites identified within the Plan?

- IQ61.1. Yes, the pitch and plot needs for gypsy and travellers and travelling showpeople identified within the 2024 GTAA ([examination library reference LPA01](#)) can be accommodated on existing sites and sites identified within the Plan.
- IQ61.2. The need for pitches for gypsy and travellers identified within the 2024 GTAA can be accommodated through a combination of provision on existing traveller sites and on the types of sites identified within Joint Local Plan Policy HOU10 part 1a to d ([examination library reference CSD01](#)).
- IQ61.3. On the supply of pitches, the Housing Requirement, Affordable Housing and Gypsies, Travellers and Travelling Showpeople Topic Paper ([examination library reference TOP03.2](#)) paragraphs 4.33 to 4.43 identifies the sources of supply of pitches within the plan period. Table 13 goes on to identify how the various sources of supply will contribute to meeting the pitch needs of gypsies and travellers. For South Oxfordshire it identifies a supply of between 45 and 61 pitches, and for Vale a supply of between 16 and 24 pitches. The supply of pitches is made up of: a) implementation of extant planning permissions (0 South, 0 Vale), b) expansion/intensification (1 South, 0 Vale), c) regularisation (12 South, 2 Vale), d) allocations (24 to 40 South, 12 to 20 Vale), other sources: household dissolution (7 South, 2 Vale) and vacant pitches on unauthorised sites (1 South, 0 Vale).
- IQ61.4. Since the publication of the topic paper ([examination library reference TOP03.2](#)) decisions have been issued on the two pitches in Vale counted within the supply of pitches from regularisation. One pitch was refused, and the other pitch granted temporary permission. Therefore, the supply of pitches in Vale shown in Table 13 of the topic paper needs to be reduced by one pitch because that specific pitch has been refused and is not therefore suitable.
- IQ61.5. Paragraphs 4.38 to 4.40 of the housing topic paper ([examination library reference TOP03.2](#)) identify how we have identified additional pitch

capacity. The approach to supply in table 13 only identifies capacity where this is known, uses average pitch size to determine additional capacity and only includes sites where there is reasonable prospect the site could be developed.

- IQ61.6. The justification for the range of 6 to 10 pitches requirement on the housing allocations is set out within paragraphs 4.48 to 4.53 of the topic paper ([examination library reference TOP03.2](#)) which includes:
- delivery of pitches in sustainable locations;
 - enabling the needs of travellers to be considered at the outset of the design process;
 - in accordance with key objective of the PPTS;
 - of a size which can be easily integrated and managed than larger sites;
 - of a scale that is generally accepted amongst the Travelling community; and
 - the upper limit of 10 pitches is supported by the government's Traveller Site Fund 2022/23 – prospectus.
- IQ61.7. Developers of the housing sites identified within Policy HOU10 part 1d will be expected to plan for the delivery of 10 pitches on each site, unless there is evidence that this pitch requirement is no longer required to be met in full. This will be demonstrated either through the completion of a new GTAA (which we are required to undertake periodically and our consultant recommends is undertaken on a 5-yearly basis - [examination library reference LPA01](#) paragraph 10.13), or through evidence that there have been sufficient grants of permission for pitches such that the full requirement of 10 pitches no longer needs to be delivered.
- IQ61.8. The topic paper ([examination library reference TOP03.2](#)) in table 14 identifies the residual need for pitches when supply is compared against the variant need scenarios identified in the GTAA. In South depending on the scenario and assuming the upper end figure of 10 pitches is delivered at each of the housing allocations, there is a potential oversupply of 6 pitches or a shortfall of 7 pitches. In Vale there is potential shortfall of between 2 and 16 pitches.
- IQ61.9. In addition to the supply identified in table 13 ([examination library reference TOP03.2](#)) the GTAA assesses the potential for re-lets of pitches on public sites to contribute to the supply of pitches. Table 15 ([examination library reference TOP03.2](#)) identifies a supply of 3 pitches per annum in South (48 in plan period) and 1 pitch per annum in Vale (26 in plan period). As identified in the topic paper (see paragraph 4.42) although we do not consider it likely that the total number of pitches that are suggested by the GTAA will become available through re-lets, evidence does suggest it will contribute to supply.

- IQ61.10. Therefore, balancing potential shortfall in Vale (of between 2 and 16 pitches) with supply from social site re-lets (potentially 26 pitches), the JLP more than meets the pitch needs. It represents an overall step change in provision to meet the increased pitch needs shown in the GTAA, while taking a cautious approach which does not rely too heavily on social site re-lets. The potential supply of pitches with and without social relets is identified in table 16 of the topic paper ([examination library reference TOP03.2](#)).
- IQ61.11. In addition to the sources of supply set out above and within the topic paper ([examination library reference TOP03.2](#)) there may also be capacity for intensifying or scope for expanding other sites which were not promoted to the GTAA consultant or do not benefit from permanent permission. The criteria in part 2 of policy HOU10 ([examination library reference CSD01](#)) will be used to assess all proposals that come forward on the types of sites identified within part 1 of this policy, and to determine all other speculative applications.
- IQ61.12. The need for plots for travelling showpeople identified within the 2024 GTAA can be accommodated on existing yards within the plan area. No plots for travelling showpeople were identified within the 2024 GTAA as being needed within Vale of White Horse. Four plots were identified ([examination library reference LPA01](#), table 8.3) as being needed up to 2041/42 within South Oxfordshire.
- IQ61.13. The 2024 GTAA consider potential sources of supply to address the identified plot requirements ([examination library reference LPA01](#), paragraph 8.13 to 8.22). The 2024 GTAA identifies potential sources of supply of 3 plots for travelling showpeople within South Oxfordshire ([examination library reference LPA01](#), see Table 8.4) as a result of household dissolution, resulting in a residual need for 1 plot. The need is from the households on private sites and given the modest size of the need, there is scope for meeting this family need on those existing private sites.
- IQ61.14. The GTAA 2024 did not identify any specific need for residential moorings for boat dwellers in South or Vale, however if proposals do come forward for residential mooring they will be assessed against the requirements of Policy JT7 part 7 ([examination library reference CSD01](#)).

IQ62 Are there any implications for the content of the Plan and/or the evidence base arising from the revised Planning Policy for Travellers Sites published in December 2024? In particular, does the GTAA 2024 take account of the revised definition of Gypsies and Travellers in defining existing and future needs?

- IQ62.1. There are no implications for the evidence base arising from the revised Planning Policy for Travellers Sites (PPTS) published December 2024.
- IQ62.2. Our 2024 GTAA was already applying the same approach as the new 2024 PPTS definition, which is a broad definition. The definition had been a point of contention during the finalisation of the GTAA regarding whether to include those households who had never travelled (see [Appendix 1](#) and corresponding [102 Minutes](#) in Appendix 2) but the 2024 PPTS confirmed the inclusive approach. The consultants assumed a single 'cultural need' for gypsies and travellers, which includes all need arising from the travelling community, rather than applying the nomadic way of life test as required by the 2015 PPTS (and 2023 amended definition). The 'cultural need' identified within the 2024 GTAA is therefore in accordance with the revised 2024 PPTS definition which now includes "and all other persons with a cultural tradition of nomadism or of living in a caravan".
- IQ62.3. Following changes to the planning definition, a minor modification is subsequently required to the supporting text of Policy HOU10 in paragraph 6.63 ([examination library reference CSD01](#)). This is to remove reference to circumstance where permission may be granted for additional pitches at authorised sites for members of the travelling community who do not meet the planning definition. Additionally, a minor modification is required to update the reference in footnote 40 to the 2024 PPTS update:

Minor Modification to paragraph 6.63 of the Joint Local Plan:

Permission for pitches or plots granted under this policy will be conditioned to ensure they are occupied by households meeting the planning definition for either gypsies and travellers or travelling showpeople, as set out in the PPTS (or replacement document). ~~In some instances, the councils may also grant planning permission for additional pitches at authorised sites that will not be lived in by travellers who meet the planning definition. This will only be appropriate where this would allow travellers to remain on the site and continue to live near their family.~~

Minor Modification to footnote 40 of the Joint Local Plan:

40 Ministry of Housing, Communities and Local Government, Ministry of Housing and Department for Levelling Up, Housing and Communities (2024~~3~~) Planning policy for traveller sites, available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

IQ63 What is the justification for the 20% requirement in Policy NH2?

IQ63.1. The submission version Justification for Higher Biodiversity Net Gain Topic Paper ([examination library reference TOP04.1](#)) sets out in detail the justification for requiring 20% biodiversity net gain (BNG) in accordance with the PPG⁸. This topic paper demonstrates that a 20% BNG requirement is justified based on:

- i) The local need for a higher percentage (Topic Paper Section 5)

The rate of expansion of built-up areas in the districts in recent decades has been well above comparative regional and national figures. This expansion has placed increasing pressure on the districts' biodiversity, as habitats have reduced and become increasingly fragmented. This has resulted in biodiversity declining above comparative regional and national figures, as evidenced by Thames Valley Environmental Records Centre's (TVERC) exploration of habitats and species trends ([examination library reference NHL14](#)). Development pressure in the districts will remain high to 2041, with significant greenfield allocations, meaning that pressure on the districts' biodiversity will continue to increase over the plan period. The Joint Local Plan provides a critical opportunity to take action to support nature recovery and to ensure that future development leaves our natural environment in a better state, in alignment with wider district, county, regional and national ambitions.

- ii) The local opportunities for a higher percentage (Topic Paper Section 6)

The Assessment of Sites' BNG Potential ([examination library reference NHL11.1](#)) considered how much BNG might feasibly be delivered on sites in the districts, taking account of both Joint Local Plan site allocations and typical windfall developments likely to come forward over the plan period. The assessment found that many sites will be able to meet a 20% BNG requirement on-site, with some strategic allocations having the potential to deliver much higher on-site gains, possibly providing a supply of units for other developments.

Section 6 of the topic paper addresses opportunities for delivering BNG off-site in the districts, where this is needed to help meet BNG requirements. The topic paper points to a growing habitat bank market, with established habitat banks already operating in both

⁸ Paragraph: 006 Reference ID: 74-006-20240214

districts and a pipeline of future sites expected to come forward over the plan period.

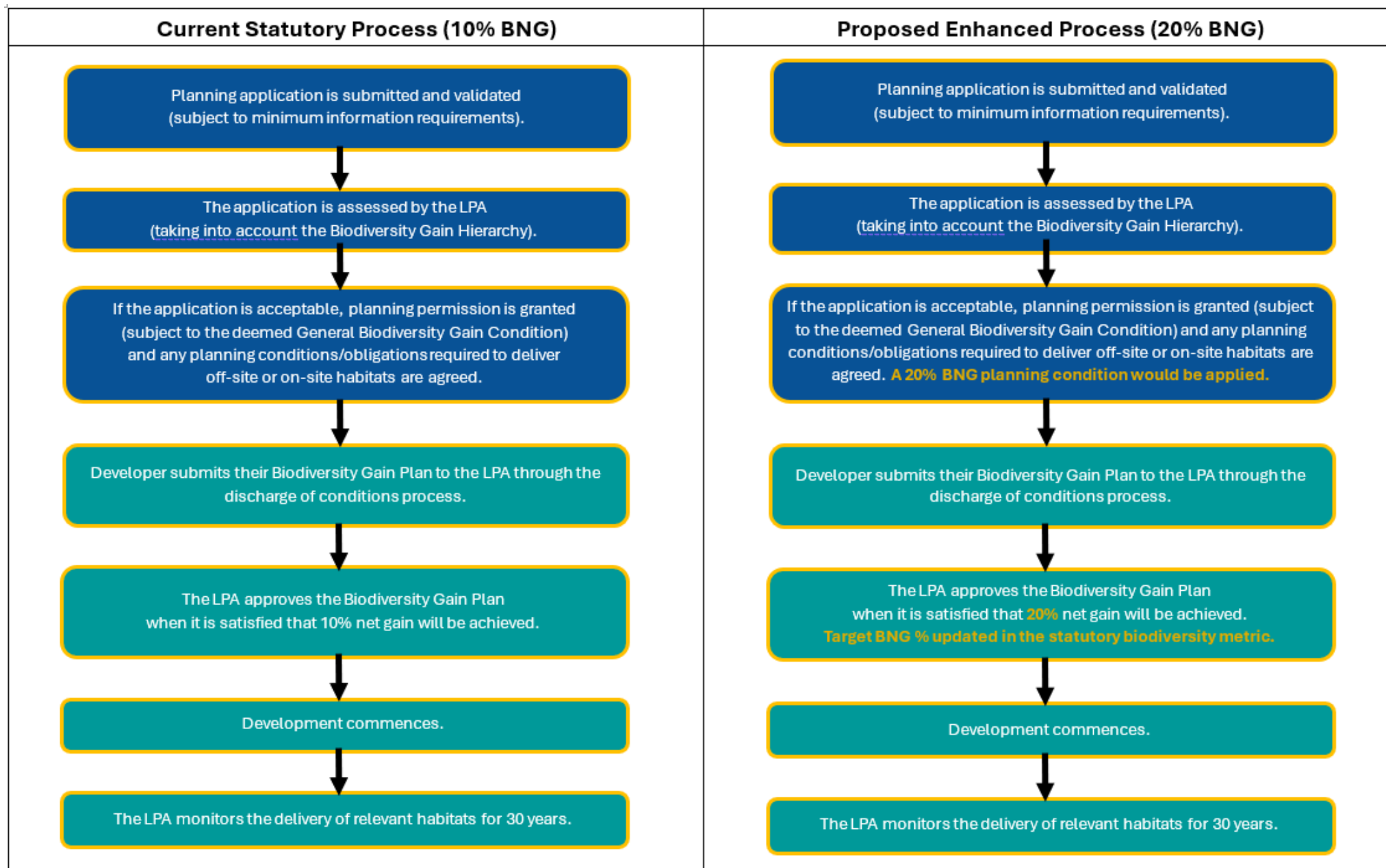
- iii) The financial viability of a higher percentage (Topic Paper Section 7)

The Joint Local Plan Viability Report (examination library references [ITV04](#) and [ITV04.01](#)) demonstrates that 20% BNG, when considered in combination with the costs associated with other Joint Local Plan policies, is viable to deliver in the districts. Further information is also provided in the response to IQ65 below.

- IQ63.2. The PPG states that consideration also needs to be given to how a policy requiring a higher BNG percentage will be implemented. This is addressed briefly in Section 8 of the Topic Paper. However, further detail is provided in the response to IQ64 below.

IQ64 How would the requirement be implemented?

- IQ64.1. We are already implementing the statutory BNG process (summarised in column one below). This process came into force for major developments on 12 February 2024 and for smaller developments on 2 April 2024. It is proposed that the requirement to provide an additional 10% BNG, to achieve a total BNG of at least 20%, could be effectively implemented alongside this process (as summarised in column 2 below).



IQ64.2. To explain the process in more detail:

- a) Under the statutory BNG process, applicants are only required to provide baseline habitat information when submitting a planning application (although they may choose to submit information on post-development habitat values if they wish). Requiring 20% BNG would not result in any additional validation requirements.
- b) Similarly, there would be no change to the way that planning applications are assessed. Baseline habitat information would still be verified and compliance with the Biodiversity Gain Hierarchy would be considered, with the aim of minimising harm and maximising the enhancement and creation of habitats on-site.
- c) Under the statutory BNG process, if a planning application is considered acceptable, planning permission is granted subject to the deemed general BNG condition set out in paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990. In accordance with the PPG⁹, we do not include this condition on the decision notice and instead provide supplementary information on the deemed condition in accordance with Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

To ensure developments meet the Joint Local Plan requirement to provide at least 20% BNG, it is proposed that a condition is added to decision notices, for example:

Condition: The relevant biodiversity net gain percentage, for the purpose of paragraph 2(3) of Schedule 7A of the Town and Country Planning Act 1990 (as amended), shall be taken as 20%.

Reason: To ensure that the development achieves a total of at least 20% biodiversity net gain (an additional 10% biodiversity net gain above the statutory minimum), to comply with Policy NH2 of the Joint Local Plan 2041 and paragraphs 187d and 192b of the National Planning Policy Framework.

At this stage, any planning conditions or obligations required to deliver significant on-site habitat enhancements or off-site enhancements on other land within the control of the developer are also secured.

- d) After planning permission is granted, the developer submits a Biodiversity Gain Plan through the discharge of conditions process. Instead of setting out how the objective of at least 10% BNG will be met, the Biodiversity Gain Plan would need to set out how the development will provide at least 20% BNG. This would be done using the same metric and Defra Biodiversity Gain Plan template as is used for the statutory BNG process.

⁹ Paragraph: 024 Reference ID: 74-024-20240214

- e) The relevant council would approve the gain plan when it is satisfied that the information submitted is accurate and that at least 20% BNG will be achieved.
- f) At this point, subject to any other pre-commencement conditions being discharged, development would commence.
- g) As with the statutory BNG process, we would monitor the delivery of relevant habitats over a period of 30 years.

IQ64.3. We have a team of experienced in-house ecologists to oversee this process.

IQ65 How would this requirement affect the viability of relevant development?

IQ65.1. The Topic Paper regarding the Justification for Higher Biodiversity Net Gain ([examination library reference TOP04.1](#)) explains that the 20% requirement in Policy NH2 would not adversely affect the viability of relevant development. The Joint Local Plan Viability Report and Appendices (examination library references [ITV04](#) and [ITV04.1](#)) tested the impacts of the Joint Local Plan policies, including a higher BNG requirement, on the financial viability of development and show that the proposed 20% BNG requirement is viable to implement in the districts. The report tested strategic sites and a wide range of different development typologies across different sub-market areas in the districts.

IQ65.2. In testing the viability impacts of the 20% BNG requirement, the Viability Report took account of the findings of Thames Valley Environmental Records Centre's 'Assessment of Sites' BNG Potential' ([examination library reference NHL11.1](#)), particularly in terms of assumptions for the number of off-site biodiversity units that would need to be purchased for sites to meet different BNG requirements (if any). This meant that all assumptions used were evidence-based. The proposed site allocation analysis was site-specific, and the assumptions used for the typologies were based on real-world examples of typical developments that would be expected to come forward in the districts over the plan period. The Viability Report used average local prices for off-site biodiversity units in the districts provided by local habitat bank operators in Summer 2024.

IQ65.3. In some cases, the 'Assessment of Sites' BNG Potential' found that proposed strategic site allocations could provide surplus on-site biodiversity units, significantly beyond those required to meet the 20% BNG requirement, even with the precautionary approach applied. In such cases, there is potential for developers to sell surplus units to other developers to generate additional income - and this was also factored into the Viability Report. This is a significant positive, enhancing the viability of these site allocations.

IQ65.4. For further detail, Table 6.10 (page 58 of the Viability Report) highlights the Construction Cost Assumptions for BNG:

- £0 - £711 per dwelling for Brownfield typologies
- £850 - £2,020 per dwelling for Greenfield typologies
- Specific costs calculated for housing allocations in Chapter 8 of the plan.

IQ65.5. The Viability Report Appendix 5 ([examination library reference ITV04.1](#), pages 254 to 257) provides a breakdown of the construction costs included in the Viability calculations. This includes Biodiversity Net Gain costs, provided as £/unit (see pages 255 and 257). Appendix 8 (page 340) then provides detailed appraisals and sensitivity tables broken down by typology. The BNG sensitivity tables can be found in Table 8 within each typology. This can also be read in conjunction with the summary Residential Viability Results (page 69 onwards of the main Viability Report).

IQ66 Can the Councils provide justification for the policy requirements in Chapter 4 going beyond the current/planned building regulations?

IQ66.1. The first policy in Chapter 4 that includes a requirement going beyond current/planned building regulations is Policy CE1 – Sustainable Design and Construction. Part 2 c) of this policy requires all new housing developments and non-domestic buildings must submit an overheating assessment. For all new housing development, a CIBSE TM59 assessment must be completed, and for all new non-domestic buildings a CIBSE TM52 assessment must be completed.

IQ66.2. For context, Part O of building regulations only mandates an overheating analysis for new homes, with CIBSE TM59 being one way to demonstrate compliance with Part O. However, it is not required in all cases—only when the developer chooses to use the dynamic method. The more commonly used simplified method does not require a CIBSE TM59 assessment. Part O also does not require an overheating assessment for non-domestic buildings. Policy CE1 therefore goes beyond building regulations by mandating overheating assessments in all cases, ensuring a consistent, robust approach to identifying and mitigating overheating risks in new buildings.

IQ66.3. We consider these overheating assessments essential due to the significant and increasing risk heatwaves pose to the districts. Requiring comprehensive overheating assessments for all new housing development and non-domestic buildings ensures overheating is effectively mitigated,

protecting the health and welfare of occupants. Dynamic thermal modelling considers a wider range of variables than the simplified method, including the intensity of heat gains, orientation, occupancy patterns, local shading, ventilation, and dwelling layout. This comprehensive analysis helps in identifying potential overheating issues more accurately and allows for better mitigation strategies. Without integration of these variables, assessed by CIBSE assessments, overheating risk is higher and therefore could decrease occupant health and wellbeing.

- IQ66.4. The Oxfordshire Climate Vulnerability Assessment ([examination library reference CEQ15](#)), analysed the current and future risks posed by climate-related hazards in Oxfordshire. It found that heatwaves are becoming more frequent in the county, posing the greatest future climate risk in Oxfordshire. Some of the highest heatwave risks were identified to be in Abingdon, as well as other built-up areas across Oxfordshire, disproportionately affecting vulnerable groups such as the elderly and children, as well as critical infrastructure like healthcare facilities. These findings highlight the urgent need for adaptation measures. Mandating overheating assessments for all new residential and non-domestic buildings is a key step to addressing this risk. This is particularly crucial for critical infrastructure such as healthcare facilities and schools, which are not currently required to submit overheating assessments under building regulations due to being classed as non-domestic development.
- IQ66.5. Additionally, as buildings become more energy efficient and thermally insulated, overheating risk increases. Integrating overheating assessment requirements into Policy CE1 alongside Policy CE2 – Net Zero Carbon Buildings ensures a comprehensive approach that addresses both mitigation and adaption. For these reasons, we consider this policy approach justified.
- IQ66.6. While we specified TM59 and TM52 as the appropriate methodologies for assessing overheating in buildings, it is important to note that the 13 December 2023 Written Ministerial Statement (2023 WMS) referenced in the question does not address overheating. The 2023 WMS focuses solely on energy efficiency and carbon emissions, and requires any additional requirements to be expressed by reference to the Target Emissions Rate. The 2023 WMS does not mention overheating standards. Whilst overheating risk and energy efficiency are linked, CIBSE overheating assessments do not assess energy efficiency. Therefore, we do not consider that the proposed requirement for an overheating assessment in Policy CE1 engages the 2023 WMS.
- IQ66.7. The second policy in Chapter 4 that includes a requirement going beyond current/planned building regulations is Policy CE2 – Net Zero Carbon

Buildings. This policy requires the use of the energy metrics Space Heat Demand (part 1 of the policy) and Energy Use Intensity (EUI) (part 2 of the policy) to achieve net zero carbon buildings. We are aware that the 2023 WMS states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. However, the 2023 WMS does contemplate that such additional requirements may be justified at examination subject to impacts on viability, housing supply and affordability; and provided they are expressed as % uplift of a dwelling's TER (Target Emissions Rate set by Building Regulations), using a specified version of SAP.

- IQ66.8. To consider this further, we commissioned consultants Bioregional to produce an addendum to the Net Zero Carbon Study, to review Policy CE2 in light of the 2023 WMS ([examination library reference CEQ14.5](#)) assessing its impact on South and Vale's local net zero carbon targets. The addendum demonstrates that local circumstances to justify a policy departure from the 2023 WMS are evident. The addendum compared Policy CE2 against a 2023 WMS compliant Future Homes Standard (FHS) policy to establish if these policy approaches would align with local net zero carbon targets for South and Vale. Both South Oxfordshire and Vale of White Horse have set targets to become carbon neutral districts by 2045. To assess compliance with this target, the study established a carbon budget for operational carbon emissions from new build housing in South and Vale.
- IQ66.9. The study modelled the estimated operational carbon emissions associated with both Policy CE2 and the two potential Future Homes Standard specifications (FHS Options 1 and 2), representing the planned national standards referred to in the 2023 WMS, over the period of 2025 (expected plan adoption) to 2045 (the local net zero target year). The findings show that both Future Homes Standard Option 1 and Option 2 resulted in a level of residual operational carbon emissions from new build housing in 2045 that exceeds the carbon budget set to align with the districts' net zero target dates of 2045, whereas Policy CE2 did not contribute any emissions from new build housing and does not exceed the carbon budget set in the study. This confirms that only Policy CE2 aligns with the councils' net zero targets.
- IQ66.10. The study also identified the inadequacies and inaccuracies associated with building regulations (outlined in section 1 of the addendum), notably how the Target Emissions Rate (TER) measured through the Standard Assessment Procedure (SAP) excludes unregulated energy which can account for up to 50% of carbon emissions in new builds. This further supports the need for Policy CE2, as a policy which does not go beyond existing or planned national standards would result in substantial residual emissions, making local net zero targets unachievable.

- IQ66.11. The study highlights how South and Vale are well positioned to be national leaders in net zero local plan policy. The districts are home to two major science and innovation centres driving low-carbon innovation, demonstrating that ambition and expertise in sustainable building practices are embedded within the region.
- IQ66.12. The addendum, when read alongside the wider Net Zero Carbon Study findings, provides a strong evidence base to justify that Policy CE2 can be successfully implemented, and crucially needs to be implemented to help meet our 2045 local net zero targets. Task 3 of the Net Zero Carbon Study ([examination library reference CEQ14.1](#)) demonstrates the feasibility of achieving the policy targets within Policy CE2, and the policy has also been rigorously costed (Task 4 – [examination library reference CEQ14.2](#)) and determined to be viable in the districts' Viability Report (examination library reference ITV04), as further explained in our response to IQ67. The Joint Local Plan Viability Report ([examination library reference ITV04](#)) assesses the cumulative impact of all policies in the plan, and includes bespoke costs for achieving the standards in Policy CE2 (which were established in Net Zero Carbon Study Task 4 – Cost Analysis, [examination library reference CEQ14.2](#)).
- IQ66.13. In the appendix of the addendum, it also sets out how local plans in Cornwall, Bath & North East Somerset, and Central Lincolnshire have successfully adopted ambitious energy standards using alternative energy-based metrics and calculation methods. These local plans demonstrate the feasibility and effectiveness of using energy-based metrics to deliver genuine carbon reductions, supporting the case for going beyond the limitations of TER and SAP as outlined in the 2023 WMS. The appendix of the addendum sets out how actual application monitoring in those local plan areas has shown, so far, that there has been no drop-off in application numbers and thus no indication that these policies are impeding housing supply.
- IQ66.14. In summary, the addendum clearly sets out that there are demonstrated local circumstances to justify departure from the 2023 WMS, as the policy approach set out in Policy CE2 is necessary for both South and Vale to achieve their shared net zero carbon target date of 2045. We refer you to the full addendum and wider Net Zero Carbon Study to read through the full study context, analysis and findings to justify the inclusion of Policy CE2 in the Joint Local Plan.
- IQ66.15. The final policy in Chapter 4 that includes a requirement going beyond current/planned building regulations is Policy CE7 – Water Efficiency. Policy CE7 requires that all new homes must be designed to high water efficiency standards, with water use not exceeding 100 litres per person per day (lpppd), or any future tighter standard that may replace this. Again, the 2023 WMS is concerned specifically with energy efficiency and carbon

emissions and is not engaged by Policy CE7. Whilst all new homes have to meet the mandatory national standard set out in the Building Regulations of 125lpppd, the NPPG allows local planning authorities to set Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day if there is a clear local need identified¹⁰. Both South Oxfordshire and Vale of White Horse adopted Local Plans require new developments to be designed to a water efficiency standard of 110 lpppd for new homes. The Water Efficiency Topic Paper ([examination library reference TOP11](#)) provides strong local evidence of, amongst other things, serious water stress in our districts, and in conjunction with the Future Homes Hub recommendations actively advising the government for tighter standards, the requirement of no more than 100 lpppd as set out by policy CE7 in the JLP is considered entirely justified. It is further justified by the viability assessment outcomes which demonstrate the costs of achieving this standard still leads to viable schemes.

IQ66.16. Commentary has not been provided on Policy CE3 – Embodied Carbon in response to this question, as there are currently no Building Regulations that address this issue and therefore no national standard against which consistency can be judged. Additionally, the 2023 WMS does not mention embodied carbon. Therefore, we do not believe that justification is needed for policies going beyond existing requirements in this area.

IQ67 Can the Councils provide evidence to demonstrate that development would remain viable in the Plan area with those requirements?

IQ67.1. Yes. As mentioned above, the Joint Local Plan Viability Report and Appendices ([examination library references ITV04](#) and [ITV04.1](#)) demonstrate that development would remain viable in the Plan area with the requirements described in IQ66 going beyond current/planned building regulations. The Viability Report, provided by Aspinall Verdi, tested the impacts of all relevant Joint Local Plan policies on the viability of a suite of different development typologies in different market areas in the districts and on the viability of the Strategic Site allocations.

IQ67.2. With regard to Policy CE1 – Sustainable Design and Construction, and Policy CE2 – Net Zero Carbon Buildings, Aspinall Verdi took account of the likely cost impact of implementing these policies, by using the Net Zero Carbon Study assessments undertaken by Bioregional and Currie and Brown and including the costs highlighted in these assessments in their viability appraisals. The Net Zero Carbon Study can be found in the examination library under references CEQ 14, CEQ 14.1, CEQ 14.2, CEQ 14.3, CEQ 14.4 and CEQ 14.5.

¹⁰ Paragraph: 014 Reference ID: 56-014-20150327 Revision date: 27 03 2015

- IQ67.3. Addressing Policy CE1 – Sustainable Design and Construction, Aspinall Verdi explain in their Viability Report, page 21: *‘Whilst this policy will have an impact on the costs of development, many of these requirements broadly relate to meeting government standards. It is therefore anticipated that most costs will therefore be no higher than standard development costs.’* This can be read in conjunction with Tasks 1 and 2 of the Net Zero Carbon Study ([examination library reference CEQ14](#)) page 87. This provides policy recommendations for the overheating assessment requirements used in Policy CE1. Page 87 confirms, under the ‘Feasibility and Costs Overview’ that there are *‘no feasibility or cost implications’*.
- IQ67.4. With regard to Policy CE2 – Net Zero Carbon Buildings, please see [examination library reference CEQ14.2](#) (Currie and Brown and Bioregional’s Net Zero Carbon Study Task 4 – Cost Analysis). The cost findings presented in this report provided the evidence to support the viability assessment of policies that included specific targets for reduction of operational and embodied carbon (Policies CE2 and CE3 in the Joint Local Plan). CEQ 14.2 page 3 confirms that a representative selection of domestic and non-domestic archetypes was used to assess cost implications for different development types.
- IQ67.5. The Cost Analysis can be read in conjunction with the Viability Report, page 21. Regarding Policy CE2, Aspinall Verdi explain:

‘It is anticipated that this policy will have a direct impact on the cost of development for schemes as requirements go beyond national policy requirements or building regulations.’

The Council commissioned a separate study to determine the likely cost impact of implementing these policies, over and above base build costs. This study has been undertaken by Currie and Brown and Bioregional. We have included the costs included in this assessment in our viability appraisals.

To meet Zero Operational Carbon, Currie and Brown indicate that an uplift over base build rates from Part L 2021 will be as follows:

- *Semi-Detached – £7,087 per unit*
- *Terraced - £6,391*
- *Detached - £10,047*
- *Flats – 6.2% Uplift*
- *Retail – 1.2% Uplift*
- *Offices – 6.1% Uplift*
- *Warehousing – 0% Uplift’.*

- IQ67.6. The Viability Report Appendix 5 ([examination library reference ITV04.1](#), pages 254 to 257) then provides a breakdown of the construction costs included in the viability calculations to accommodate this Policy. This includes 'Net Zero Carbon Buildings' costs, provided as £/unit (houses) and as a % uplift on costs (flats). Appendix 8 (page 340 onwards) then provides detailed appraisals and sensitivity tables broken down by typology. Accounting for net zero carbon costs can be found within each typology listed under 'Construction Costs', labelled 'Additional Low Carbon/Energy Reduction'. This can also be read in conjunction with the summary Residential Viability Results (page 69 onwards of the main Viability Report).
- IQ67.7. With regard to Policy CE7 – Water Efficiency, the Joint Local Plan Viability Report took into account the cost implication of an enhanced water efficiency target, acknowledging that 100 litres per person, per day (100 lpppd) is a pioneering requirement. Please see the Viability Report, page 23, which confirms for Policy CE7, that Aspinall Verdi specifically included an allowance of £350 per unit for water efficiency - based on the 2024 Future Homes Hub 'Water Ready' report¹¹.
- IQ67.8. Overall, the Viability Report demonstrates that the additional cost incurred by imposing 100 lppd does not adversely impact the viability of schemes. Moreover, in considering its application, the report suggests that these costs are considered to be the 'worst-case' scenario, indicating that actual costs could be less than those estimated.
- IQ67.9. The Viability Report Appendix 5 ([examination library reference ITV04.1](#), pages 254 to 257) also provides a breakdown of the construction costs included in viability calculations to accommodate this policy. This includes water resource costs, provided as £/unit. Appendix 8 (page 340 onwards) then provides detailed appraisals and sensitivity tables broken down by typology. The report's accounting for water efficiency costs (£350 per unit) can be found listed under 'Construction Costs' within each typology. This can also be read in conjunction with the summary Residential Viability Results (page 69 onwards of the main Viability Report).
- IQ67.10. Overall, the Aspinall Verdi Viability Report demonstrates that the requirements of the Joint Local Plan policies as a whole, including the policies going beyond current/planned building regulations mentioned in IQ66, do not adversely impact the viability of schemes.

¹¹ Future Homes Hub (2024) Water Ready report, available at: https://irp.cdn-website.com/bdbb2d99/files/uploaded/Water%20Ready_A%20report%20to%20inform%20HM%20Government-s%20roadmap%20for%20water%20efficient%20new%20homes.pdf

IQ68 Do the policies provide sufficient flexibility where applicants can provide evidence that meeting the higher standards would not be technically feasible or viable?

- IQ68.1. Yes, Policy CE2 – Net Zero Carbon Buildings sets out specific wording in part 6 of the policy that allows for flexibility for applicants in exceptional circumstances where policy requirements cannot be met because of feasibility concerns, such as insufficient roof space for renewable energy generation. In such cases, any annual on-site energy use not matched by on-site annual renewable energy generation can be offset subject to agreement with the council. The energy offsetting will be facilitated through a council-led offsetting fund supported by developer contributions. This fund will deliver local projects designed to save an equivalent amount of carbon and/or cover the shortfall in renewable energy generation.
- IQ68.2. The energy efficiency requirements set out in Policy CE2 have also been subject to a feasibility study ([examination library reference CEQ14.1](#)) which is part of the wider Net Zero Carbon Study. This study found that the requirements of Policy CE2 are technically feasible for residential buildings, and in most cases, for non-residential buildings. It is important to note that the space heating demand and total energy use requirements of Policy CE2 are feasible for all building typologies tested (set out in part 3 b of the policy). The on-site renewable energy generation target is only found to be marginally unfeasible for the office typology. In cases where the on-site renewable energy generation requirement of Policy CE2 is demonstrated to be legitimately unfeasible, sufficient flexibility is provided through the last resort energy offsetting approach, which is expected to be necessary only in exceptional circumstances.
- IQ68.3. Additional flexibility is provided for non-residential buildings where their inherent use means they produce very high unregulated energy loads, resulting in the specified EUI limits set out in part 3 (v) of the policy being unattainable. Where the council agrees the high unregulated energy loads are justified, Policy CE2 allows for an alternative limit on regulated energy use of 30 kWh/m²/year, with unregulated loads justified in an energy statement demonstrating they are as efficient as is reasonable for the use.
- IQ68.4. In relation to Policy CE1's overheating requirements, we do not expect feasibility to be a concern for applicants. As CIBSE overheating assessments are endorsed in national standards, as included in Part O, it is clear that the completion of these assessments are feasible, as well as their cost also being marginal for applicants. Additionally, we do not expect Policy CE7's water efficiency target to be a feasibility concern for applicants, as the allowance of £350 per unit for water efficiency is considered negligible.

IQ68.5. Flexibility in cases where applicants provide evidence that meeting the higher standards would not be viable has not been explicitly provided in the policy wording for CE1, CE2 or CE7. This is because the Joint Local Plan Viability Report and Appendices (examination library references [ITV04](#) and [ITV04.1](#)) tested the impacts of all relevant Joint Local Plan policies on the financial viability of strategic sites and a wide range of different development typologies across the districts and show that the policies as written are viable to implement in the districts.

Q69 The Infrastructure Delivery Plan (IDP) (CSD05.1) sets out the infrastructure requirements for the large-scale site allocations AS1-AS5 and AS8-AS10 together with the Didcot Garden Town Area. What about the infrastructure requirements for other site allocations proposed within the Plan?

IQ69.1. The Infrastructure Delivery Plan (IDP) ([examination library reference CSD05.1](#)) provides the infrastructure needs for all “AS” site allocations, either through specific entries in Appendix 2, or through the Didcot Infrastructure Requirements.

IQ69.2. The remaining housing supply in the plan (set out in Policy HOU2) is either a completion, commitment or windfall allowance. These sites have planning permission, and have signed a Section 106 agreement / contributed Community Infrastructure Levy. Therefore, the infrastructure needs and contributions for these sites are set out in detail under their planning permission / legal agreement.

IQ70 The IDP considers infrastructure requirements for the categories of education; transport and highways; leisure; green infrastructure and open space; healthcare; utilities and other. Has digital infrastructure been considered?

IQ70.1. Policy IN8 sets out the requirement for all developments to provide appropriate digital infrastructure. However, the Infrastructure Delivery Plan (IDP) ([examination library reference CSD05.1](#)) does not include a specific reference to digital infrastructure contributions. We will update the IDP to include this.

IQ71 Would the green infrastructure category encompass biodiversity and nature conservation?

- IQ71.1. The estimated costs of Green Infrastructure (GI) in the Infrastructure Delivery Plan (IDP) ([examination library reference CSD05.1](#)) are derived from laying out costs of the typical range of GI and open space typologies required by JLP Policy HP7.
- IQ71.2. The costings breakdown show that the GI in the IDP will make a contribution towards biodiversity and nature recovery. For example, it references rough grassland, species rich grassland, woodland, wetland – as well as other habitat types and provides a typical cost for laying out spaces to provide these.
- IQ71.3. In some instances, where existing on-site biodiversity value is low for example, this new provision may be sufficient to deliver policy compliant BNG under Policy NH2. In other instances, where existing on-site biodiversity value is high, it may not be. Where this is the case, further measures (e.g. onsite habitat creation, or allocation of offsite BNG units) may be needed beyond the GI costings set out in the IDP.
- IQ71.4. The Viability Report ([examination library reference ITV04](#)) has tested a “worst case scenario” whereby none of the costs of delivering GI would overlap with those of delivering BNG. The cost for delivering BNG have been established through a comprehensive evidence base, see responses to IQ63 and IQ65.
- IQ71.5. We are content to update the IDP to refer to the above to ensure this is clearly presented.

IQ72 Would social and cultural infrastructure, such as theatres, libraries etc be considered?

- IQ72.1. The Infrastructure Delivery Plan (IDP) ([examination library reference CSD05.1](#)) has considered some social and cultural infrastructure, for example, library contributions, public art, community halls, and archaeological record storage.
- IQ72.2. We have not included theatres in the IDP. We are not aware of the need for new or upgraded theatre space, and this has not been raised in response to our Regulation 18 consultations. We didn't therefore commission a study to assess theatre needs in our districts, as this would not have been proportionate. Without such evidence the IDP wouldn't be justified in asking for contributions towards theatres.
- IQ72.3. However, CIL money can be drawn down on for this where local projects come forward through the councils' CIL Spending Strategies.

IQ73 Are all infrastructure requirements within each one of the large-scale site allocations required to be delivered at the same time; or should the IDP include any phasing periods to indicate prioritisation of the requirements within each site?

IQ73.1. No, the infrastructure requirements are unlikely to be delivered at the same time on each site. The exact timing of infrastructure delivery is agreed through phasing plans and trigger points in legal agreements, signed when the councils issue planning permission. However, the Infrastructure Delivery Plan site schedules in Appendix 2 ([examination library reference CSD05.1](#)) contain an “estimated timescale for delivery” column. This breaks down the likely delivery of infrastructure from start on site into short term (0-5 years), medium term (6-10 years), long term (11+ years), or for the duration of construction. This is set out in paragraph 6.6 of the IDP ([examination library reference CSD05.1](#)).

IQ74 Paragraph 4.4 of the IDP refers to an Education Topic Paper being produced by Oxfordshire County Council. What stage has this reached, and when is it anticipated to be submitted?

IQ74.1. Oxfordshire County Council officers have shared a draft with us. We are aiming to submit this in early March 2025.

IQ75 Are there any outstanding changes/updates arising from any ongoing engagement with other bodies or other concerns with IDP? If so, how are the Councils proposing to resolve these?

IQ75.1. The Infrastructure Delivery Plan (IDP) will be a live document that the councils update when there are any significant changes in infrastructure needs in the districts.

IQ75.2. On 11 December 2024 the Secretary of State for Housing, Communities and Local Government issued a decision¹² granting planning permission for the “HIF1” infrastructure scheme. This is a significant infrastructure project that will unlock planned growth across Science Vale – notably around Culham and Didcot. We will update the IDP to make clear that this now has been granted planning permission.

IQ75.3. There are a number of infrastructure entries in the site schedules in Appendix 2 ([examination library reference CSD05.1](#)) that are high level, identifying the need to consider a development’s impact on that type of

¹²https://assets.publishing.service.gov.uk/media/6759aec74cbda57cacd346ed/241211_A34_Combined_DL_IR_RtC.pdf (We suggest submission of this to the Examination library)

infrastructure at the planning application stage. There are also some costs associated with infrastructure that are “to be confirmed”.

- IQ75.4. Not all infrastructure projects, mitigation, and costs can be known when we are preparing our local plan. This is because the allocations are strategic and will need to be worked up in detail through masterplans, and some of the infrastructure is not fully designed and costed. This is inevitable with long term masterplans and strategic allocations.

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