

Vale of White Horse Local Plan 2031: Part 1

Supplement to the Regulation 22 Statement

Council Response to Summarised Representations

As part of the Local Plan 2031 Part 1 Submission to the Secretary of State, the Council produced a Regulation 22 Statement in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This provided a summary of the consultation processes for the Local Plan 2031 Part 1 including a summary of all the main issues raised through Regulation 19. At Appendix 3 of the submitted Regulation 22 Statement the Council categorised and summarised all the representations from Regulation 19 Pre-submission public consultation, according to the part of the Local Plan and supporting documents that the comments most directly related to.

Following submission of the Local Plan, the Inspector requested that the Council provide a response to the summary of representations. This document provides our response.

The tables in this document supplement and should be read alongside Appendix 3 of the Regulation 22 Statement which lists the consultees whose comments are included in the categorised and summarised representation.

Chapter 1: Introduction

Core Policy 1: Presumption in Favour of Sustainable Development

Category	Summary	Council Response
CP1 - Policy Wording	The response states that Core Policy 1, in part, reflects the principles of the presumption in favour of sustainable development, and it partly reflects the Planning Inspectorate's model wording of this policy. However, for it to be legally compliant and positively prepared it needs to fully reflect the model wording.	The Council is satisfied that the policy is closely aligned to the NPPF and the presumption in favour of sustainable development. The Policy should be read in conjunction with the Development Plan taken as a whole.
CP1 – Support	Support is outlined for Core Policy 1 as it adopts the same principles as Paragraph 14 of the NPPF. It seeks to promote the delivery of sustainable development. The Policy reflects the requirements of the Framework and the presumption in favour of sustainable development. The second paragraph of the policy is also supported in that it reflects the need for the Council to make decisions, which it may not necessarily have the policy Framework for.	Noted.
CP1 – Sustainable Development	A number of comments relate to Core Policy 1 and the delivery of sustainable development. These include: <ul style="list-style-type: none"> • CP1 should be amended to closely align with the NPPF model policy • There can be no presumption of 'sustainable development' based on the high projections of housing need in the Oxfordshire SHMA which is itself unsound, unsustainable and should not be relied upon • The suggestion that the Plan represents sustainable development should be removed. • CP1 is too flexible. The definition of sustainable development is weak (paragraph 1.13) and could become a presumption in favour of any development, especially if the NPPF economic aspect overrides other considerations. Safeguards are needed to prevent the abuse of the presumption in favour of sustainable development • CP1 refers to the NPPF Paragraph 14 but does not adequately reflect the implications of the Footnote 9 and National Planning Practice Guidance with regard to restrictions that apply to AONBs and other key designations. 	The Council is satisfied that the policy is closely aligned to the NPPF and the presumption in favour of sustainable development. The Policy should be read in conjunction with the Development Plan taken as a whole.
CP2	Three main points are raised: <ol style="list-style-type: none"> 1. There has been a failure to consider unmet Need 2. There are allocations in the Green Belt and AONB when alternatives are available 3. An artificial Ring Fence has been proposed preventing the Garden City proposal coming forward 	<p>The Council is satisfied that all these matters are adequately addressed.</p> <p>1. Unmet need is addressed through CP2 in accordance with the DTC agreement with other Oxfordshire authorities.</p>

Category	Summary	Council Response
		<p>2. Reasonable alternatives have been assessed - the proposed spatial strategy presents the Council's preferred approach based on available evidence.</p> <p>3. The Garden City proposal has been tested as a reasonable alternative. Its exclusion does not relate to the Ring Fence proposed through CP5.</p>

Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire

Category	Summary	Council Response
CP2 – DtC	<p>A number of comments are made that relate to Core Policy 2 and the Duty to Cooperate. These include:</p> <ul style="list-style-type: none"> • The Oxfordshire Growth Board has agreed to undertake a 'Post SHMA Strategic Work Programme' which sets out how they plan to cooperate (minutes, November 20th). This includes completing an Oxfordshire-wide Green belt review by June 2015. Until this coordinated effort has been made this Plan cannot comply with the duty to cooperate • Policy CP2 commits the plan to joint working with other Local Authorities regarding unmet need but provides no firm commitment concerning the timeframe of completing this which does not fully comply with Duty to Cooperate • CP2 places an unjustified reliance on a review • Additional work outlined in Core Policy 2 needs to be undertaken prior to submitting the Plan to the Secretary of State • The policy refers to assessing all reasonable spatial options, including release of brownfield land, potential for new settlements and a strategic review of Oxford Green Belt. These are not issues for the Council to consider in isolation. The county is supportive of the intention to work jointly with other Oxfordshire local authorities to address unmet housing need. But there is a need for an Oxfordshire wide approach which integrates housing provision, employment and infrastructure across the county to ensure coordinated planning. This should be made explicit in the text to ensure the Plan complies with Duty to Cooperate • The last sentence of CP2 could rule out other reasonable spatial options which CP2 commits to assessing as part of joint work. Suggest CP2 be amended by deleting the last sentence - "The appropriate approach will depend on the scale of the unmet need to be accommodated". This would allow for a different or modified spatial strategy, if required, and ensure the Plan complies with Duty to Cooperate • It is necessary to first demonstrate that brownfield sites are fully utilised in neighbouring authorities' plans before offering VOWH land for development. 	<p>The Council is satisfied that CP2 is compliant with the DTC agreement reached with other Oxfordshire authorities including the commitment to working positively to address un-met need, once the extent of need has been established, in a timely and fully cooperative way. 12-18 months is indicated in supporting text para 1.21 for this work as agreed at Oxfordshire Growth Board 20 November 2014. The policy is sufficiently clear that the "issues are not for the council to consider in isolation". The last sentence of the policy is clear that "The appropriate approach will depend on the scale of the unmet need to be accommodated". The DTC statement shows how the Council has cooperated with neighbouring authorities and prescribed bodies.</p>

Category	Summary	Council Response
CP2 - General comment	It is stated that land identified as unsuitable currently should also be unsuitable for development to meet other councils' needs. The housing is likely to produce commuter housing to meet the needs of London, not the local area. It will not solve housing issues here but will make them worse.	Un-met housing need for Oxfordshire will be addressed through a separate process, following agreed methodology, with the other Oxfordshire authorities. The housing target for the VoWH is clearly derived from an up-to-date and NPPF compliant SHMA; it does not contribute housing for London.
CP2 - Green Belt	Government guidance (6 March 2014) states that Unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the “very exceptional circumstances”. The Vale has not demonstrated there are exceptional circumstances. This policy states that cooperation with other Oxfordshire Authorities will include a full strategic review of the whole of the green belt. This seems inconsistent with the Vale having carried out their own review and raises the possibility of a succession of reviews each time there is a new housing needs assessment.	The VoWH has completed a Green Belt Review for the district and has recommended that any sites no longer meeting the purposes of the GB are removed in accordance with the NPPF recommendations. The difference with a strategic GB review is that it will cover all Oxfordshire authorities, not just the Vale. No sites have been identified through the GB Review to contribute towards addressing un-met need; this is not the purpose of a GB Review.
CP2 – Local Plan 2 Timescales required	We suggest that timescales for the preparation of Part 2 be provided in accordance with Paragraph 182 of the NPPF.	12-18 months is indicated in supporting text para 1.21 for this work as agreed at Oxfordshire Growth Board 20 November 2014. Any revised timescales would first need to be agreed by all Council Leaders through the DTC process. If agreement is reached, the Council does not see why this clarification could not be added to CP2.
CP2 - South Oxfordshire Comments	South Oxfordshire District Council confirm the Councils have worked together however supporting text could be improved to reflect partnership working.	Points noted.
CP2 – Support	A number of comments provide support for Core Policy 2. These include:• We are encouraged that the housing target reflect the Objectively Assessed Need for the District as identified by the up-to-date Oxfordshire SHMA and acknowledgement of unmet need, and support the Council’s flexible policy approach to enable cooperation with other LPAs in future. This shows how the Vale of White Horse has exercised its requirement for the Duty to Cooperate• We support the proposal to progress the Local Plan (Part 1) on the basis of	Noted.

Category	Summary	Council Response
	<p>meeting the District's objectively assessed housing needs, while working with other Oxfordshire authorities to address unmet needs in the wider Housing Market Area• We support the District Council's pragmatic approach to addressing unmet needs arising elsewhere in the Oxfordshire Housing Market Area (section 2.1.10)• The VoWH Local Plan provides the certainty required to bring forward development in a timely manner, as well as providing the district with a strong policy basis upon which to determine a planning application. The policy proposed is effective in meeting local needs, justified by local circumstances, and positively prepared by allowing development to come forward in a co-ordinated manner• The approach taken is considered fully compliant with PPG guidance• We endorse the Council's pragmatic approach to addressing Oxford's unmet housing need once quantified. CP2 is a key policy helping deal with the short-term need for housing whilst securing the framework to underpin the delivery of Oxford's needs in the medium term. The approach adopted by the Council will make an immediate contribution to supporting nationally significant economic development in the Oxford area. The ongoing commitment and consistent approach adopted by local authorities to the duty-to-cooperate, across Oxfordshire Housing Market Area, is reinforced by the Inspector's Note No.2 {Cherwell Local Plan Examination, 2014}• The duty-to-cooperate is clearly being fulfilled to deliver any unmet housing need across the Oxfordshire housing market area as far as is reasonably possible. Furthermore, through the Local Plan, the Council has the necessary planning policy hooks in place to accommodate any additional housing need in the district as and when it is jointly identified• We support this on-going joint working with other Oxfordshire local authorities, and importantly, the Vale of White Horse District Council's commitment to the process. However, need to be realistic about the timeframe for reaching agreement on the extent of unmet need to be</p>	

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	accommodated beyond the administrative boundary of Oxford City and the methodology for the strategic review of the Green Belt.	
CP2 – unmet need – cannot accommodate	A number of responses state that the Vale should not take any of Oxford's unmet need due to lack of infrastructure and impact on heritage and rural character. The strategy breaches NPPF requirements as it does not protect the environment, build healthy and sustainable communities, support sustainable transport and accessibility, or prosperity.	The Council has a DTC on addressing any un-met need for Oxfordshire as demonstrated by CP2. A separate process, using agreed methodology, will determine if any un-met need should be located within the VoWH. The approach to planning for OAN is fully compliant with the NPPF.
CP2 – unmet need	A number of comments object to Core Policy 2 and the extent it addresses unmet need for Oxford City. These comments include: <ul style="list-style-type: none"> • The Plan does not take account of the recognised unmet need arising from Oxford City • To provide for Vale's housing needs while disregarding Oxford's unmet needs is an inappropriate strategy when assessed against alternatives, contrary to the NPPF and DtoC • Clarification is needed as to whether the Local Plan has determined whether it needs to accommodate unmet housing needs from adjoining Districts, or not • The policy is not positively prepared or justified as it does not seek to address unmet housing requirements from neighbouring authorities and is insufficiently flexible to meet the housing target identified • The decision to defer full provision to a review in the future or another development plan document is flawed • In this context, additional housing within the District will be required, and in the short term an increase in the five-year land supply • Policy CP2 should acknowledge that Oxford will be unable to accommodate the whole of its new housing requirement. On the basis that the City will be unable to meet all its needs, a contingency reserve of at least 10% should be planned for as reserve sites. The principle of these contingency sites can be established in the Part 1 Plan and either be identified in it or left to a Part 2 local plan or a partial review. The trigger for the release of these contingency sites can be the acknowledgement that Oxford City is not meeting its needs. This approach will enable the plan to start to meet a portion of 	The Councils approach to addressing un-met need is consistent with the DTC agreement reached with the other Oxfordshire authorities. Un-met need can only be addressed through cooperative working with all authorities, and not in isolation, as reasonable alternatives will need to be assessed across all these districts to inform how any unmet need is apportioned to be taken forward in district local plans. The only alternative to meeting the VoWH OAN in full in the first instance would be to delay preparation of the LP until un-met need had been resolved. This could only delay housing delivery in Oxfordshire. This approach is consistent with the advice of the Planning Inspector presiding over the Cherwell LP Examination.

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	these unmet needs as early as possible. Such a change will make the Local Plan more legally compliant, sound and comply with the duty to cooperate.	
English Heritage - Paragraph 1.31	The Council has worked with English Heritage on the historic environment policy and potential site allocations, which should be mentioned in paragraph 1.31.	Minor change will assist in demonstrating that collaborative working has been carried out with English Heritage.
OCC - CP2 – DtC (1)	The Local Plan, CP2, discusses the need for the council to: Work jointly with all of the other Oxfordshire local authorities to address any unmet housing need. This will include assessing all reasonable spatial options, including the release of brown field land, the potential for new settlements and a full strategic review of the whole of the Oxford green belt. These issues are not for the Council to consider in isolation. The county is supportive of this intention but there is a need for an Oxfordshire wide approach which integrates housing provision, employment and infrastructure across the county to ensure coordinated and not piecemeal planning. This should be made explicit in the text to ensure the Plan complies with Duty to Cooperate.	The Council believes that the approach is sufficiently clear. The Council is actively participating in a HMA-wide process to identify how any un-met need will be apportioned with regard to five operating principles agreed by Growth Board (Nov 2014) that recognise both the primacy of local plans and the need for a joined up county wide spatial picture and strategy.
OCC - CP2 – DtC (2)	Policy CP2 commits the plan to joint working with other Local Authorities regarding unmet need but it does not provide a firm commitment concerning the timeframe of completing this which does not fully comply with Duty to Cooperate.	<p>12-18 months is indicated in supporting text para 1.21 for this work as agreed at Oxfordshire Growth Board 20 November 2014. Any revised timescales would first need to be agreed by all Council Leaders through the DTC process. If agreement is reached, the Council does not see why this clarification could not be added to CP2.</p> <p>Inclusion of the housing trajectory within a supporting paper assists this information in being more readily updated, rather than if it forms part of the LP itself.</p>
OCC - CP2 – DtC (3)	Policy CP2 commits the plan to the following, should it be identified that the Vale needs to accommodate some unmet need as an outcome of the joint work with other Local Authorities: If, following this joint work, it is identified and agreed, either through the Oxfordshire growth board or through an adjoining local plan	The Council believes that the proposed Spatial Strategy represents the most sustainable and appropriate and is fully consistent with wider strategies for Oxfordshire. The last sentence of the policy is clear that “The appropriate approach will depend on the scale of the unmet need to be accommodated”.

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	<p>examination, that any unmet housing need is required to be accommodated within this district, the Council will either: • undertake a full or focused partial review of the Local Plan 2031, or • allocate appropriate housing sites through a subsequent development plan document in conformity with the Spatial Strategy set out in the local plan 2031. Potentially the latter wording (underlined) could rule out other reasonable spatial options which CP2 commits to assessing as part of the joint work and as a result would not comply with the Duty to Cooperate.</p>	
OCC - CP2 – unmet need	<p>Oxford City Council response to Vale of White Horse Local Plan Part 1 Publication Oxford City Council welcomes the opportunity to comment on the Vale of White Horse Local Plan Part 1. However the City Council has a fundamental objection to the approach taken in the Plan to the Duty to Cooperate, in particular regarding meeting Oxfordshire’s housing needs, and to the link between this and the soundness of the proposed Plan. You will be aware from our previous discussions and representations to earlier consultations on the Plan that Oxford is facing a deepening housing crisis, with various national surveys carried out in recent years identifying Oxford as the least affordable city in the country. The severe constraints on land availability within Oxford’s administrative boundaries mean that we must look to neighbouring districts, which are geographically much larger than Oxford, to provide housing land within close proximity of Oxford to meet a portion of Oxford’s housing needs. It is necessary to urgently begin to address the significant unmet housing need of the City that was most recently identified in the Oxfordshire SHMA 2014. Local Plans must comply with the Duty to Cooperate, which expressly means addressing cross-boundary development needs and achieving outcomes to this within the Plan. There is no support in Government policy, guidance or published best practice for references to future arrangements or future joint working to address cross-boundary needs. The City Council concludes therefore that, overall, the Vale</p>	<p>The Councils approach to addressing un-met need is consistent with the DTC agreement reached with the other Oxfordshire authorities. Un-met need can only be addressed through cooperative working with all authorities, and not in isolation, as reasonable alternatives will need to be assessed across all these districts to inform how any unmet need is apportioned to be taken forward in district local plans. The only alternative to meeting the VoWH OAN in full in the first instance would be to delay preparation of the LP until un-met need had been resolved. This could only delay housing delivery in Oxfordshire that would not be helpful for the VoWH or any of the other authorities. This approach is consistent with the advice of the Planning Inspector presiding over the Cherwell LP Examination.</p>

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	<p>Local Plan Part 1 fails to meet the legal test for the Duty to Cooperate, and cannot be assessed as a sound Plan. It also fails to consider all reasonable alternatives and therefore is legally vulnerable when considered against the SEA Directive. These are complex matters that overlap and are not entirely separate, I have as far as possible cross-referenced each point raised with the relevant paragraph/part of the Plan, and indicated the Test of Legal Compliance or Soundness to which it applies.</p>	
OCC - CP2 – unmet need (1)	<p>Paragraph 1.22 refers to the Oxford City SHLAA being underway at the time of writing. We can now confirm that this work has been finalised and published¹, and takes into account all of the comments made by Vale and the other districts during the ‘check and challenge’ process. The SHLAA identifies a capacity of 10,212 in the City 2011 to 2031. This is considerably short of the need identified in the Oxfordshire SHMA of 24,000 to 32,000 homes. I would highlight that a draft SHLAA reporting a similar number was circulated to VoWH Council on 1st October, well before the Vale Plan was finalised and published and within 6 months of the publication of the SHMA. It cannot be appropriate for the Vale Plan to ignore the implications of this evidence which was available well before publication of the plan. In light of the background, there is no justification for not making provision in Plan policies or delaying the process. Well before commencement of preparation of the Vale Local Plan, Oxford’s unmet needs were known to be of a scale that would require a strategic approach in the context of the Local Plan Part 1: the evidence for this includes the former South East Plan and supporting evidence base (as highlighted in the corresponding Panel Report) and the previous 2007 SHMA. Therefore for paragraph 1.23 to explicitly make provision only for Vale’s own housing needs whilst disregarding Oxford’s unmet needs is not an appropriate strategy when assessed against alternatives, and is therefore not justified. (This also applies to all other relevant parts of the Plan.)</p>	<p>The Councils approach to addressing un-met need is consistent with the DTC agreement reached with the other Oxfordshire authorities. Un-met need can only be addressed through cooperative working with all authorities, and not in isolation, as reasonable alternatives will need to be assessed across all these districts to inform how any unmet need is apportioned to be taken forward in district local plans. The only alternative to meeting the VoWH OAN in full in the first instance would be to delay preparation of the LP until un-met need had been resolved. This could only delay housing delivery in Oxfordshire. This approach is consistent with the advice of the Planning Inspector presiding over the Cherwell LP Examination.</p>

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OCC - CP2 – unmet need (2)	<p>Concluding remarks It is with regret that Oxford City Council is obliged to maintain a fundamental objection to the approach taken in the Vale Local Plan Part 1. This is due to the failure to take adequate account in the Plan of Oxford’s well-evidenced and substantial unmet housing need. This runs contrary to the NPPF and the Duty to Cooperate which require that the full, objectively assessed needs of the housing market area should be addressed in local plans, working on a cross-boundary basis. The City Council confirms that it wishes to continue to engage with the Vale of White Horse District Council on this and other matters, noting that the Duty to Cooperate applies on an on-going basis, and up until submission in the context of local plans.</p>	<p>The Councils approach to addressing un-met need is consistent with the DTC agreement reached with the other Oxfordshire authorities. Un-met need can only be addressed through cooperative working with all authorities, and not in isolation, as reasonable alternatives will need to be assessed across all these districts to inform how any unmet need is apportioned to be taken forward in district local plans. The only alternative to meeting the VoWH OAN in full in the first instance would be to delay preparation of the LP until un-met need had been resolved. This could only delay housing delivery in Oxfordshire. This approach is consistent with the advice of the Planning Inspector presiding over the Cherwell LP Examination.</p>
OCC - CP2 – unmet need (3)	<p>Duty to co-operate and overarching Soundness issues (in particular relating to meeting Oxfordshire’s housing needs) It is to be welcomed that the Duty to Co-operate Topic Paper (para 3.4) recognises that the following are all strategic issues related to making provision for housing needs from Oxford: “Specific comments relating to Vale’s duty to cooperate included: - concerns that Vale would need to address some or all of the un-met need expected to arise from Oxford City and potentially from other neighbouring authorities in the housing market area - some comments raised the point that Vale’s Local Plan was proceeding prematurely in relation to the above point and questioned its soundness as a result - some general comments in support of the inclusion of a policy in the local plan looking at addressing Oxford’s un-met need - Oxford City Council objected to the Housing Supply Update consultation in that it did not make provision for any unmet Oxford City needs - request for clear and demonstrable cooperation to take place between relevant authorities regarding the expansion of Oxford Brookes University - some commented on the need for a strategic review of the entire Oxford Green Belt rather than a local review” However we would comment that to simply note these issues without ensuring that they have had</p>	<p>The Councils approach to addressing un-met need is consistent with the DTC agreement reached with the other Oxfordshire authorities. Un-met need can only be addressed through cooperative working with all authorities, and not in isolation, as reasonable alternatives will need to be assessed across all these districts to inform how any unmet need is apportioned to be taken forward in district local plans. The only alternative to meeting the VoWH OAN in full in the first instance would be to delay preparation of the LP until un-met need had been resolved. This could only delay housing delivery in Oxfordshire. This approach is consistent with the advice of the Planning Inspector presiding over the Cherwell LP Examination.</p>

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	<p>sufficient influence on the Plan is inconsistent with the Duty to Co-operate. In terms of joint working and effective outcomes, regard must also be had to the Duty to Cooperate and Tests of Soundness. The NPPF sets out the Tests of Soundness that are supported by PPG: Tests of soundness in NPPF (paragraph 182) (emphasis added):</p> <ul style="list-style-type: none"> • positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so while achieving sustainable development, and • effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. PPG sets out that this process should produce “effective and deliverable policies on strategic cross boundary matters” (paragraph 001 Reference ID: 9-001-20140306). <p>The City Council acknowledges that there has been effective joint working in jointly commissioning and producing the SHMA. The Oxford and Oxfordshire City Deal was a further example of successful joint working across all the local authorities in the County: this commits the authorities to meeting the Oxfordshire objectively assessed housing need in full. The City Council is actively engaged with the post-SHMA process as a member of the Growth Board and its subsidiary groups. However the Duty to Cooperate is not just about process but also about achieving effective outcomes, and the current wording in the proposed policies is not effective with regards to meeting Oxfordshire’s housing needs. It fails to address Oxford’s unmet need, which for some years has been clearly and irrefutably evidenced, and pushes into the future any commitment from the Vale District Council to address this. The Duty to Cooperate Topic Paper (para 3.17) refers to the agreed ‘post SHMA’ process, which is being overseen by the Growth Board, and we welcome this process as facilitating a useful dialogue. However that process explicitly refers to the ‘sovereignty’ of Local Plans and does not guarantee any</p>	

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	<p>appropriate provision for Oxford's unmet needs. It therefore falls to individual Local Plans that have not yet been adopted to include outcome-based (rather than future process-based) policies to address the unmet need. I would refer you to the letter from the City Council dated 4th April 2014 to Scott Riley responding to the Housing Delivery Update and our further letter dated 8th August 2014 to Ronan Leydon for evidence of the City Council's clear and longstanding concerns regarding the Duty to Cooperate.</p>	
OCC - CP2 – unmet need (4)	<p>1 - Introduction Paragraphs 1.9, 1.11, 1.22, 1.23, 1.24, 1.32 and Core Policy 2 It is clear that an outcome-based policy is needed to comply with national policy and established best practice in plan-making. The NPPF states in paragraph 47: "To boost significantly the supply of housing, local planning authorities should... use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period." The NPPF is clear that the OAN relates to the Housing Market Area – in this case the county of Oxfordshire. Meeting only the Vale of White Horse's Objectively Assessed Housing Need (OAN) as an 'important first step' is therefore not compliant with the NPPF which requires that the OAN of the whole Housing Market Area should be addressed. Paragraph 178 of the NPPF makes it clear that the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities. Paragraph 179 goes on to say: "Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of</p>	<p>The Councils approach to addressing un-met need is consistent with the DTC agreement reached with the other Oxfordshire authorities. Un-met need can only be addressed through cooperative working with all authorities, and not in isolation, as reasonable alternatives will need to be assessed across all these districts to inform how any unmet need is apportioned to be taken forward in district local plans. The only alternative to meeting the VoWH OAN in full in the first instance would be to delay preparation of the LP until un-met need had been resolved. This could only delay housing delivery in Oxfordshire. This approach is consistent with the advice of the Planning Inspector presiding over the Cherwell LP Examination.</p>

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	<p>physical capacity or because to do so would cause significant harm to the principles and policies of this Framework.” Reflecting this and recent experience of local plan examinations, a recent Planning Advisory Service publication, “Doing Your Duty – Practice Update” advises: “It is not sufficient for an authority to acknowledge that it may have to address potential unmet needs from within its own HMA and adjoining HMAs by including a proposed contingency approach in their plan to trigger a review with neighbouring authorities to agree a future strategic framework for local plans. The plan has to be assessed on the level of cooperation that has led to the current draft plan and not what may happen in the future.” (subsection 9, page 11) It is clear therefore that the Duty to Cooperate has not been complied with (a legal compliance issue) as it has not produced effective and deliverable policies on strategic cross-boundary matters. This means that it is also not effective (a soundness issue). The City Council would also want to stress that in the event that the Vale Plan is found sound in 2015, the ongoing work of the Growth Board in respect of addressing the Oxford unmet need would mean that the Plan would be out of date within a very short period of time. This would also render the Plan not effective, and is misleading to communities, developers, and Neighbourhood Planning groups. The Vale cites the example of the Inspector currently examining the Cherwell Local Plan as a reason to permit the plan to progress without specific provision for Oxford. It should be remembered that the Cherwell Plan, and the approach taken, has not yet been found sound, and that in any event it is not directly transferrable to the Vale scenario because the joint work has moved on significantly since Cherwell submitted its plan. Most significantly in relation to paragraph 3.40 of the Duty to Cooperate Topic Paper, Oxford City has now published Oxford’s Housing Land Availability and Unmet Needs Assessment (see below).</p>	

Category	Summary	Council Response
OCC - CP2 – unmet need (5)	Unmet Need and Early Review of the Plan 10. The Plan contains a policy relating to unmet housing need across Oxfordshire (CP2), identifying that the City may not be able to accommodate the whole of its housing requirement within the plan period of 2011-2031. However it has not considered explicitly how any unmet need might be delivered and which could require a need to look at different spatial strategies. There is a need to ensure that the Plan adequately addresses the issue of collaborative working to deal with unmet housing needs. A countywide strategic review of spatial strategy options and associated infrastructure planning is required to accommodate unmet need, the process of which has to be defined. The wording proposed in the policy should be amended to make it more explicit about the need for an Oxfordshire-wide, comprehensive approach, which integrates housing provision, employment and infrastructure across the county. 11. Should it be agreed that all or part of this growth be within the Vale, the impact and infrastructure to support that growth would need to be looked at, potentially through the context of a different spatial strategy to that proposed in the current Plan. 12. The Plan proposes either a review or a Development Plan Document to deal with unmet need in conformity with the Spatial Strategy. The county agrees with this proposition but would like to see flexibility in policy to allow for a different/modified spatial strategy that may be more aligned to the County overall.	The Council believes that the proposed Spatial Strategy represents the most sustainable and appropriate approach and is fully consistent with wider strategies for Oxfordshire. The last sentence of the policy is clear that “The appropriate approach will depend on the scale of the unmet need to be accommodated”.
OCC - Paragraph 1.3	The Local Plan does not align fully with the county council's strategy and the Minerals and Waste Local Plan or reflect the fact that Oxfordshire County Council produces the Minerals and Waste Local Plan for Oxfordshire.	It is unclear how Paragraph 1.3 is in anyway misleading or inaccurate.
OCC - Paragraph 1.6	Minor grammatical change. Para 1.6: Details of how..... ARE set out...	Minor grammatical change
Swindon Borough Council - CP2 – Partial Review	The Vale of White Horse Local Plan identifies a quantum of housing to meet its objectively assessed need as identified in the latest Oxfordshire wide Strategic Housing Market Assessment, including	12-18 months is indicated in supporting text para 1.21 for this work as agreed at Oxfordshire Growth Board 20 November 2014. Any revised timescales would first need to be agreed by all Council Leaders

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	<p>that arising from economic growth. This should ensure that any unmet need is not met within adjacent authorities such as Swindon and is consistent with the approach taken within the Swindon Borough Local Plan. Whilst it is recognised there may be an additional requirement with the VoWH to accommodate unmet need arising from Oxford City, as this has yet to be quantified and given the urgent need to have an up-to-date WOWHDC Local Plan, the proposal to address this through a partial review of the Plan is a pragmatic one under the circumstances. However it is recommended a time frame is included for such a review, to enable some certainty to the process. Also it is recommended that a housing trajectory is included within the Local Plan itself in order for ease of reference, rather than within a topic paper as presently shown.</p>	<p>through the DTC process. If agreement is reached, the Council does not see why this clarification could not be added to CP2.</p> <p>Inclusion of the housing trajectory within a supporting paper assists this information being more readily updated, rather than if it forms part of the LP itself.</p>

Chapter 2: Key Challenges and Opportunities

Category	Summary	Council Response
Allocation at Harwell and impact on Area of Outstanding Natural Beauty	Two objections state that the plan is inconsistent with Paragraph 2.14, which refers to the high quality rural nature of the district (including designations such as AONB). It is stated that there are two allocated sites within the North Wessex Downs AONB as this will not protect or enhance the special characteristics of the AONB, will have a serious negative impact on the landscape and the environment, the Landscape Study recommended that the site has low landscape capacity and no part of the site is suitable for development. Clear non-compliance with paragraphs 115 and 116 of the NPPF, the CROW Act 2000 Section 85, and Core policy 44: Landscape.	Points noted - the allocation of sites is based on robust evidence which includes the consideration of the impact on the AONB. This matter is considered more fully in relation to comments made against CP 15.
Building healthy and sustainable communities	Two general comments were received regarding the 'building healthy and sustainable communities' section. These stated that there a need to consider restricting permission for removal/conversion of bungalows for the increasing population of people aged over 55 and that the plan fails to provide the necessary safeguards to protect our villages, development has spread in unachievable packets which will gravely damage the Vale as a desirable area to live.	The Plan is underpinned by a sustainable spatial strategy that directs development to the most sustainable locations. Housing needs for an increasing ageing population are provided for within CP26
Building healthy and sustainable communities - housing requirement	Three comments were received that state that the Plan proposes too many houses that is unrealistic, and not in line with Government Projections, and not deliverable, thus ineffective and no consideration has been made of the Plan's cumulative impact on the Vale as a whole and the local communities. It is also stated that development will be developer led.	The Plan is based on an up-to-date and NPPF compliant SHMA that has identified the objectively assessed housing need for the whole of Oxfordshire including the VoWH.
Building healthy and sustainable communities - social facilities	Two comments relating to the 'building healthy and sustainable communities' section, state that social facilities and the standard of living, referred to in Paragraph 2.8, does not mention the importance of public houses as social facilities and Paragraph 2.7 neglects to mention there are areas with high levels of deprivation.	It is felt that public houses are encompassed within the general term 'services and facilities' described under Paragraph 2.8. The Council believe that this section adequately describes the main issues facing the district under the Building Healthy and Sustainable Communities heading.
Figure 2.1	Agree Figure 2.1 is incorrect and should be amended.	Agree Figure 2.1 is incorrect and should be amended.

Category	Summary	Council Response
Natural England - Conserving our Historic Environment (1)	English Heritage welcomes the section on “Conserving our historic environment” on page 27.	Support Acknowledged
Natural England - Conserving our Historic Environment (2)	English Heritage welcomes the reference to the conservation areas in the district in paragraph 2.14 and the recognition of the importance of development protecting and maintaining the special characteristics of the built and natural environment, but we would prefer “.....protecting, maintaining and enhancing the special characteristics of the built, historic and natural environment of the Vale.....” as not all historic features are “built” or “natural”.	Agreed minor change provides useful clarification.
Natural England - Conserving our Historic Environment (3)	Although not an issue of soundness, the section on promoting tourism on page 25 could helpfully refer to the historic character of the Vale and the heritage assets therein being an important attraction for tourists.	Agree minor change provides useful clarification
OCC - Figure 2.1	• Fig 2.1 should show the route of East West rail and para 2.12 should refer to East West rail providing access to destinations beyond Oxford	Agree this addition provides useful clarity.
OCC - Protecting the environment and responding to climate change	Agreed - the key challenge should refer to both protection and enhancement.	Agreed, the key challenge should refer to both protection and enhancement.
Oxford City Council - Building healthy and sustainable communities - housing requirement	2 – Key Challenges and Opportunities Paragraphs 2.8 and 4.10 refer to the ‘key challenge’ of ‘providing for our housing need’. The Objectively Assessed Housing Need (OAN) for VoWH of 20,560 homes is referred to. In order to provide the right context and ensure the Plan is effective, this must also refer to the unmet need with the Housing Market Area particularly that arising from Oxford.	The Council consider that this matter is adequately addressed through CP2 and with corresponding references in other relevant policies, e.g. CP4.
Oxford City Council - Supporting sustainable transport and accessibility	Paragraph 2.13 refers to the ‘key challenge’ of delivering a shift towards more sustainable modes of travel, and then lists the ways in which this could be achieved. However there is no recognition of the significant level of out-commuting, nor the importance of locating development close to the main urban centre of Oxford to achieve this.	The Plan is based on an up-to-date and NPPF compliant SHMA, that has identified the objectively assessed housing need for the whole of Oxfordshire including the Vale of the White Horse. The SHMA has considered all relevant factors in determining the housing need, including commuting patterns and using the

Category	Summary	Council Response
	The City Council notes the latest Census 2011 analysis of commuting patterns that shows an average 10,800 journeys per day from Vale of White Horse to Oxford (around three times as many as travelling to the second most popular destination, South Oxfordshire). This is an increase of 430 journeys (4% increase) since 2001. ² Lack of consideration of this issue means that the Plan is not effective.	latest available data. The Council believes that the proposed Spatial Strategy is the most sustainable and appropriate and is fully consistent with wider strategies, such as the Strategic Economic Plan.
Potential Harwell Local Development Order and impact on Area of Outstanding Natural Beauty	Twenty nine comments related to a potential Harwell Local Development Order and impact on the AONB, specifically; the use of LDO's to speed up delivery must be questioned within the AONB; although the Oxford Harwell Campus is considered a brownfield site, any new development within the site boundary should still take into account the impact on the North Wessex Downs AONB; and therefore, the appropriateness of using LDO's within the AONB setting needs to be questioned.	The Local Plan only references the potential of an LDO to be developed for Harwell, which is under consideration. The Local Plan does not determine if an LDO will or will not be prepared for Harwell Campus. If an LDO was to be prepared, the impact on the AONB would be considered within that process.
Protecting the environment and responding to climate change (1)	Four comments regarding 'protecting the environment and respecting and responding to climate change' relating to; Oxfordshire County Council state the challenge should be 'Protecting and enhancing biodiversity', South Oxfordshire Council state this section should acknowledge the need to work with neighbours, particularly to link key wildlife habitats and in protecting designated sites close to the District boundary; and there is support for the intention to protect biodiversity including the retention of wildlife corridors on existing and new build sites, especially in relation to gardens. It is also suggested that there is a need in the framework that landscape protection should be in accordance with a criteria based policy and the relative weight to be applied to the landscape designation should be commensurate with the landscape status of the site, whether that is international, national or local.	Support acknowledged
Protecting the environment and responding to climate change (2)	Protecting high quality landscapes are recognised, but there is a need in the framework that landscape protection should be in accordance with a criteria based policy and the relative weight to be applied to the landscape designation should be commensurate with the	Landscape protection is covered by CP 44.

Category	Summary	Council Response
	landscape status of the site, whether that is international, national or local.	
SODC - Protecting the environment and responding to climate change	Protecting biodiversity - This section should acknowledge the need to work with neighbours, particularly to link key wildlife habitats and in protecting designated sites close to the district boundary.	It is considered that joint working is adequately covered elsewhere in the plan.
SODC - Protecting Water Resources	Protecting water resources – It may be helpful to acknowledge that this is an area of water stress, if the water cycle study confirms this.	Points noted. In relation to the first point, the Plan at paragraph 6.101 already acknowledges this is an area of water stress however agree this is a key challenge for the District and should be amended.
SODC - Supporting Economic Prosperity	Overview Para 4 – This overview implies that Science Vale is only concerned with employment. It would be helpful to refer to the Science Vale area stretching across parts of both Vale and South and its mission to provide employment and housing opportunities, to be an attractive and thriving place, to attract infrastructure and investment	This is simply an introductory paragraph that explains that the majority of the SV area lies within the VoWH, that it includes the two EZ sites at Harwell Campus and Milton Park, and that it is an area of opportunity for job expansion and wider benefits for the area. The Council believe this paragraph is appropriate and does not need amending further.
SODC - Supporting sustainable transport and accessibility (1)	It would be helpful to mention the proximity of other stations, particularly Oxford, Didcot and Swindon which give direct access to the mainline network.	The paragraph describes where stations exist within the VoWH. There is adequate coverage of the proximity to Oxford, Swindon and Didcot throughout the document.
SODC - Supporting sustainable transport and accessibility (2)	Supporting sustainable travel 4 bullet With partners supporting improvements. A number of these improvements will need the close cooperation of SODC and OCC to implement this should be acknowledged	It is agreed that cooperation with SODC and OCC will be required to implement a number of improvements, which is acknowledged within the detailed policies, and particularly the section relating to the SV AAP (for which the two councils are working closely together) and SV Infrastructure Delivery (e.g. CP17). This bullet point list is simply a high level list of key issues, it is not intended to describe delivery mechanisms in detail.
Supporting Economic Prosperity	Seven comments regarding 'supporting economic prosperity' relating to; economic prosperity is too focused on the Eastern Vale and Science Vale with transport focussed on congestion on the A34; the Plan fails to recognise too many jobs exist in the District which results	The Local Plan merely refers to the adopted LDO relating to Milton Park and suggests that an LDO could 'potentially' be used at Harwell Campus. The Local Plan is not the decision making mechanism for whether an LDO is appropriate or not.

Category	Summary	Council Response
	in high housing cost; and that an Local Development Order (LDO) is an inappropriate mechanism to control development at Harwell Campus, which is located within the AONB.	It is a requirement of the NPPF that the Local Plan sets out the Districts' development needs for the Plan period. The Plan acknowledges the affordability of housing within the District and has a number of housing policies to assist in addressing this.
Supporting sustainable transport and accessibility	A number of comments were received regarding 'supporting sustainable transport and accessibility' relating to; there is no recognition of the significant level of out of commuting; the Plan does not adequately set its objectives in conformity with Para 41 of NPPF regarding investments in public transport; ; Stagecoach support the intent of the Plan and recognise the tighter focus on a hierarchy of modes, and the greatly enhanced role that public transport needs to play to deliver sustainable development on the scale required however the language following para 2.13 does not follow from these stated objectives strongly enough and thus the Plan is not sufficiently effective in providing the clear rationale for subsequent public transport scheme that will need to be identified and funded; and that development in rural areas should not be resisted simply on transport grounds, the lack of development in rural areas has led to a loss of rural bus services.	The plan includes significant proposals for strategic highway investment and has worked closely with the Highways Authority to prepare detailed evidence to inform plan preparation. The plan is also informed and closely aligned to LTP 3 and the emerging LTP4.
Thames Water - Protecting Water Resources	Thames Water support the section on 'Protecting Water Resources' on page 27. Specifically the section which references waste water treatment facilities and the need to upgrade them in order to facilitate new housing and employment growth	Support acknowledged

Chapter 3 Spatial Vision and Strategic Objectives

Category	Summary	Council Response
English Heritage - Spatial Vision	English Heritage welcomes the references in the Spatial Vision to new development respecting local character, protecting the Vale's outstanding and distinctive natural and built environment and conserving and enhancing its important heritage. However, the Vale's important heritage should be conserved and enhanced through other measures, not simply through new development, and this should be an objective in its own right as part of a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment as required in local plans by the NPPF and in line with the tenth core planning principle in the Framework to "conserve heritage assets in a manner appropriate to their significance.....". We would also prefer "protecting...natural, historic and built environment...." as not all historic features are "built".	The Council agrees that this amendment provides clarity to the Spatial Vision and the importance of the historic environment to the district.
English Heritage - Strategic Objective 3	English Heritage consider that SO3 should be amended to read "built, natural and historic....." A new specific objective should be added: "Conserve and enhance the historic environment including designated and non-designated heritage assets". These amendments would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.	Agree to suggested amendment to SO3. It is felt that the additional Strategic Objective is unnecessary as this matter is adequately covered by Strategic Objective 3.
Oxford City Council - Spatial Vision and Strategic Objectives	Support. These objectives steer towards a spatial strategy that includes development close to the main urban centre of Oxford, which is the greatest travel generator in the area, and would provide the best opportunity for achieving high sustainable mode shares, reducing the need to travel and making most efficient use of infrastructure.	Support noted.
Spatial Vision	A number of comments were received relating to the Spatial Vision, include those who supported the vision as drafted. Comments included:• It is suggested that the vision is silent to the need for Green Belt release and therefore does not meet the 'justified' test.• The Vision should focus on Harwell Campus as being at the centre of a new community, where additional residential and social development will take place to create a	The Spatial Vision sets a high level vision for district as a whole and was prepared following consultation and evidence gathering. It is considered unnecessary to reference all the individual policy points and detail within the vision, which needs to apply to the whole district.

Category	Summary	Council Response
	more sustainable international science hub. It is underplaying the important contribution certain locations make in providing new housing. • English Heritage consider that the third paragraph of the Vision should be amended to read: “The important historic heritage of the Vale will have been, and will continue to be, conserved and enhanced. New development will have respected the local character of the Vale, protecting its outstanding and distinctive natural, historic and built environment. High design climate change.” This would accord with paragraphs 17 and 126 of the NPPF. • It is stated that the Spatial Vision is not a community vision. It is a vision of a small number of council bureaucrats. • The Spatial Vision should include reference to an unprecedented uplift in the provision and usage of local public transport, which is required to ensure the plan delivers sustainable development. • Modify the Spatial Vision to better reflect the fact that certain larger villages will also perform a vital role in accommodating new development to further support and enhance local services.	
Spatial Vision & Strategic Objectives	A number of comments provide support to the Spatial Vision and Strategic Objectives as drafted, including those who assert that they are positively prepared, justified, effective and consistent with national planning policy.	Noted.
Strategic Objective 10	It is suggested that Strategic Objective 10 is unachievable given the scale of development proposed much of which is on green field sites. The density and total number of houses being proposed needs to be seriously reduced so that new development does not adversely impact on the natural environment.	The Council do not consider Strategic Objective 10 to be incompatible with the development proposals.
Strategic Objective 11	Strategic Objective 11 appears to imply that there is a Council standard to be met regarding design, which could potentially be prescriptive and contrary to national guidance. It could also lead to a disproportionate level of weight being applied to landscape assets.	The Council considers the strategic objective to be appropriate and adequately justified.
Strategic Objective 12	I consider the plan to be unsound in relation to SO12 - reduce greenhouse emissions. The building of residential properties to the north of Abingdon, out of walking or cycling distance of employment areas, will necessitate an increase in traffic as people drive to work. The public transport links (buses) from North Abingdon to Oxford (where a lot of people will need to travel to	The Council considers the strategic objective to be appropriate and adequately justified.

Category	Summary	Council Response
	for work) are already over-crowded at rush hour. I regularly have to wait for a second bus to turn up if I want a seat. The extra car movements will increase congestion on the A34 (and so greenhouse emissions) - again during rush hour I regularly will queue on the A34 travelling from Abingdon to Oxford.	
Strategic Objective 2	Strategic Objective 2 should be strengthened to make reference to providing retirement homes as housing for the elderly is identified as a key issue in the District.	Strategic Objective 2 already includes reference to catering for the needs of a growing older population.
Strategic Objective 3	Support is stated for Strategic Objective 3 to direct growth to the most sustainable locations in the District, ensuring development is integrated with and respects the built and natural heritage and creates attractive places in which people will want to live, as well as being supported by a sufficient range of services and facilities.	Support noted.
Strategic Objective 6	The respondents strongly support the need for the continued development of the Science Vale area, given its national and international importance.	Support noted.
Strategic Objective 7	The strategic objective is to maintain and enhance the vitality and viability of the Vale's town centres and local shopping centres in order to strengthen their service centre roles. As 70% of the new jobs identified in the Vale plan are associated with the Science Vale to the south of Abingdon, the houses proposed to the north and north-west of Abingdon on Green Belt land will severely exacerbate existing traffic problems on both local roads and A34. This will result in an adverse effect in Abingdon itself, thus reducing its viability.	Proposed housing development in the Science Vale area is closely aligned to the proposed job growth in the same area. In regards to the proposed housing, an Evaluation of Transport Impacts has been undertaken. The Infrastructure Delivery Plan and the Site Development Templates for these sites also includes a number of transport measures.
Strategic Objective 8 - Abingdon	It is stated that the proposed development in North Abingdon is not consistent with Strategic Objective 8 as around 70 % of new jobs are located within the Science Vale area, not within Abingdon and these areas are not well connected by public transport.	Proposed housing development in the Science Vale area is closely aligned to the proposed job growth in the same area. There is also a need for housing in Abingdon and so locating housing there to meet this needs does help to comply with Strategic Objective 8.
Strategic Objective 9	The plan gives very little detail around what that infrastructure should be or what triggers its implementation. Triggers for infrastructure development (roads, schools, leisure, transport, etc.) need to be specified and housing	The plan contains several policies that set out in detail what infrastructure is required. Furthermore, the plan is accompanied

Category	Summary	Council Response
	development should not be allowed to take place without the completed supporting infrastructure.	by an Infrastructure Delivery Plan that demonstrates how infrastructure will be funded and the timing of its delivery.
Strategic Objectives – Faringdon	Strategic Objectives do not adequately address the needs of Faringdon. They are too focused on the Science Vale area.	The Strategic Objectives apply equally to the whole of the district.
Strategic Objectives 1 to 4	The respondents support the strategic objectives as drafted and consider that the proposed allocation new housing development at Harwell Campus will help in meeting these general objectives	Support noted.
Strategic Objectives 8 & 9	Strategic Objectives 8 and 9 are insufficiently strongly-worded, unspecific, and lack the focus required to drive through the step changes in public transport accessibility, priority and service quality needed to rebalance transport towards more sustainable modes.	The Council consider that Strategic Objective 8 is appropriate that makes reference to promoting sustainable modes of transport.
Supporting Economic Prosperity	It is suggested that the Strategic Objectives do not provide sufficient support to the agricultural sector.	It is considered that Strategic Objective 5 adequately reflects all aspects of the Vale's economy

Chapter 4: Spatial Strategy

Core Policy 3: Settlement Hierarchy

Category	Summary	Council Response
Add Didcot to the Settlement Hierarchy	Add Didcot to the Settlement Hierarchy	The settlement of Didcot falls within South Oxfordshire District Council and is therefore outside of the plan area. However, the Council is working closely with SODC to plan for the settlement holistically and is preparing a Joint Area Action Plan for this area to facilitate coordinated planning.
Chilton settlement boundary	Chilton is allocated through the new Local Plan as a 'smaller village' where development is considered less suitable. Whilst we consider land at Pond Cottages is more likely to be included in a new settlement boundary for Harwell Oxford Campus, a new settlement boundary for Chilton should also be drawn to inform the new Local Plan 2031.	Small and Large Villages are not assigned settlement boundaries within the existing Local Plan 2011 and the Council does not propose adding them within the Local Plan 2031.
Classify Harwell Campus a Local Service Centre	Given that employment opportunities at Harwell Campus cannot be described as 'more limited in range'. There is strong justification for the Harwell Campus to be classified as a Local Service Centre.	Whilst the opportunity for employment development at Harwell Campus is large, the services and facilities currently provided for, or envisaged, are in line with the designation of Larger Village, rather than Local Service Centre.
CP 3 - Settlement Hierarchy - East Challow	<ul style="list-style-type: none"> • This seems to be to the detriment of further development in the villages. Although East Challow itself is located in the Western Vale Sub-Area, the Challow Park site sits right on the boundary and would relate to and serve both Sub-Areas. • When one looks at the Western Vale Sub-Area, East Challow even though it is a Local Service Centre, is not allocated any strategic housing development in Part One of the Local Plan despite its Local Centre status • This approach clearly disregards the settlement classifications set out under Core Policy 3, • notably the larger villages of Great Coxwell, Shrivenham and Stanford-in-the-Vale, which are receiving an astonishing 1,100 new houses between them, yet East Challow, which sits above them in 	East Challow is classified as a 'Larger Village'. There is a drafting / printing error in CP3 which needs amending. There are no sites available for development at East Challow which are either deemed suitable for development or are large enough to accommodate strategic growth.

Category	Summary	Council Response
	the settlement hierarchy, as a Local Service Centre, is receiving no houses.	
CP3 - General Comments (2)	Seeking to reallocate Harwell Campus as a local service centre	The hierarchy is based on existing services and facilities and follows a defined methodology. This will be reassessed in time as developments come forward and scored accordingly. The sustainability of Harwell Campus takes into account employment allocations but also assesses the level of provision of other services and facilities available to the local community.
CP3 - Settlement Hierarchy	<ul style="list-style-type: none"> • The green belt review to address Oxford's unmet housing need is unsound. • It is clear the land at Farmour and the overall strategy will change. • As a result the whole development strategy is unsound 	The Green Belt Review does not consider the un-met need for housing for Oxford, it simply considers the Green Belt, in accordance with the purposes of the Green Belt set out in the NPPF. An assessment for how un-met need should be addressed will be considered through a separate process working in partnership with all other Oxfordshire authorities.
CP3 - Settlement Hierarchy - East Hendred	<ul style="list-style-type: none"> • Overreliance on strategic developments in the shape of sustainable urban extensions, particularly at Wantage, Harwell and Grove • the detriment of further development in the villages, notably East Hendred. • notably the larger villages of Great Coxwell, Shrivenham and Stanford-in the-Vale, which are receiving an astonishing 1,100 new houses between them, yet East Hendred, which sits alongside them in settlement hierarchy (albeit in the South East Vale Sub-Area) is receiving no houses. • Larger Villages should only be accommodating 'local need' 	No sites are available for development at East Hendred which are either deemed suitable for development or are large enough to accommodate strategic growth.
CP3 -General Comments (1)	Linden fully supports the neighbouring Shrivenham allocation for 500 houses and Core Policy 3 which classifies Shrivenham as a Local Service Centre within the Western Vale sub area.	Support Noted.
CP3 wording inconsistent	The plan is inconsistent. Core Policy 3 and saved policy NE10 (assessed as fully consistent with NPPF) aim to protect land around Harwell village (not Harwell Parish) from urban sprawl by ensuring	It is clear that the Local Plan Part 1 makes provision for strategic allocations. Land to the west of Didcot (located within Harwell Parish) is identified for strategic growth and

Category	Summary	Council Response
	there is a rural gap. Whereas NE10 is explicit about this, CP3 says that development in and around larger villages will be limited to that which supports the local needs of the village. Fig 4.1 says the strategy will promote thriving villages...whilst safeguarding...the village character.	this is clearly set out within the plan. The Development Site Template is clear that a buffer should be retained between Harwell Village and the proposed Valley Park development.
Delivery	<p>The apportionment of the housing among settlement categories is unsound because it will fail to deliver the overall housing requirement.</p> <p>The Council will need to provide evidence that the 1,000 dwellings can be delivered in an alternative way. This cannot be left to the Part 2 Plan because there is no guarantee that this will be produced quickly enough to enable the delivery of the remaining 1,000 dwellings in time.</p> <p>Greater consideration needs to be given to delivery across the plan period. Smaller sites have shorter lead in times. Allocating such sites in key locations could help bridge the gap in supply until the larger strategic allocations start to deliver units. Given concerns regarding the timescales for the Local Plan Part 2 and restrictions under Core Policy 3 this adds further weight to the recommended approach of a single Local Plan.</p>	The plan is accompanied by a clear housing trajectory and demonstration of how a 5YHLS will be achieved. The allocation of housing in LPP2 is not relied upon for 5YHLS purposes. The provision to make allocations within the Local Plan Part 2 ensures a flexible approach. The actual allocation to be made in Local Plan Part 2 will be informed by any development coming forward through neighbourhood planning or through the development management process. The LPP1 has been amended, post SHMA, to include a number of 'smaller', albeit of at least 200 dwellings, precisely to assist in increasing housing supply and helping to accelerate housing delivery.
Designation of Harwell Oxford Campus as Larger Village	<p>The Settlement Hierarchy is not justified by robust evidence or consistent with National Planning Policy.</p> <p>Delete Harwell Campus, Milton Heights and Rowstock from the list of Larger and Smaller Villages. Harwell Campus is a Science Park not a village, more characteristic of Milton Park and Culham than a settlement. Neither Milton Heights nor Rowstock have the characteristics of other villages in the Vale.</p> <p>Designating Harwell Oxford Campus as a 'Larger Village' in the Local</p>	The Council is confident its methodology for developing the Settlement Hierarchy is robust and is consistent with the National Planning Policy Framework. Indeed, it is underpinned by the planning principles of focusing growth towards the larger, most sustainable settlements and towards the area where employment growth and infrastructure delivery will be directed. Harwell Campus has services and facilities equivalent to a larger village, and is, in the opinion of the Council, a sustainable and suitable location for development.

Category	Summary	Council Response
	<p>Plan is misleading as the Campus is primarily an employment site on private land. Designate the Harwell Oxford Campus as an employment site.</p> <p>Paragraph 4.3 fails to mention that a significant proportion of the South East Vale is within the North Wessex Downs AONB, including the Harwell Oxford Campus.</p>	
Designation of Harwell Oxford Campus as Larger Village - Remove Caveats	Core Policy 3 designates Harwell Campus as a 'Larger Village' within the Settlement Hierarchy, subject to a caveat which states that Harwell Campus has facilities and services equivalent to a Larger Village. We consider that this caveat introduces ambiguity and could infer that Harwell Campus, whilst having the facilities and services equivalent to a Larger Village, is not considered appropriate for the scale of development supportable at other Larger Villages. Removing the caveat would result in a policy which is clear and practical, ensuring that growth is promoted in all suitable settlements including Harwell Campus.	Whilst it is considered that Harwell Campus has clearly been designated as a larger village, it is recognised that the phrase 'equivalent to' could introduce ambiguity and could be made clearer.
East Challow allocated to incorrect area	Object to Core Policy 3 on the basis that East Challow is erroneously included within the Western Vale Sub Area.	The Council considers that East Challow forms part of the more rural and western part of the Vale where there is less focus on strategic growth.
Exclusion of Shippon from Larger/Smaller Villages designation	Manor Preparatory School is seeking a policy framework in the emerging Local Plan that will allow it to meet its operational needs. Policy CP3 has not been positively prepared; is not justified or effective; and is inconsistent with national policy. To remedy these defects make Shippon an "inset" village, which will allow the School to plan positively for the future having regard to the requirements of relevant development management policies.	Shippon is clearly identified as a smaller village where development will be appropriate in accordance with its role.
Expansion of Chilton village into the AONB	Chilton has been designated a "Smaller Village", defined as a village "with a low level of services and facilities, where any development should be modest and proportionate in scale and primarily be to meet local needs." Chilton has increased in size by ~80% with the completion of 275 new houses at Chilton Field by Autumn 2014. Use	Strategic development is proposed at Harwell Campus (designated as a larger village) that extends within the parish of Chilton, but not to the village of Chilton.

Category	Summary	Council Response
	<p>of out of date maps and aerial photographs is of concern. Omitting the recent development from the Local Plan maps is misleading and makes it harder to assess the impact on the AONB and local character.</p> <p>The plan to expand the smaller village of Chilton, within the legally protected landscape of North Wessex Downs AONB, does not comply with Paragraph 4.7 and will undermine Spatial Strategy Sustainable Development Core Policy 1 aim “Promote thriving villages and rural communities whilst safeguarding the countryside and village character”, making the Plan unsound.</p>	
Functional Relationship of Grove with Wantage	Whilst it may be correct to classify Grove as a ‘Local Service Centre’ in isolation (and at this time), the specific functional relationship with Wantage and the level of committed development require clarification as part of this policy, so as to ensure that it and the plan as a whole is effective (and sound). Include Grove within Wantage Market Town, so the rate of house completions in Wantage/Grove can be monitored together as being within a Market Town.	Grove is a larger village that is classified as a 'local service centre' within the plan to ensure its strategic role is recognised within the plan and to ensure that the planned growth is supported by the provision of appropriate infrastructure, services and facilities. Grove is a separate settlement to Wantage. Whilst its functional relation to Wantage is clearly referred to in the plan, it should continue to be recognised as a separate settlement.
Landscape and rural character	CP3 would significantly increase the % of new development in Larger and Smaller Villages. Developments of over 50 dwellings in Larger and Smaller Villages with under 500 dwellings is likely to affect the character, appearance and countryside setting, esp. in AONB, of existing settlements. Relative to small villages, limited development needs to be defined more accurately to ensure our rural villages are not destroyed in the future by excessive over-development. To impose this level of new housing across the Vale needs to be managed sympathetically.	The NPPF sets out the Presumption in Favour of Sustainable Development that is transposed into the Local Plan Part 1. On this basis, it is not appropriate to precisely define levels of development within individual settlements.
Larger Village designation – Great Coxwell	Great Coxwell is described correctly in CP3 as a "Smaller Village", where any development should be modest and proportionate in scale and primarily be to meet local needs", but in CP4 as a "Larger	Strategic development is located at Faringdon, within the parish of Great Coxwell. There is no strategic development directed to the village of Great Coxwell. However, the Council

Category	Summary	Council Response
	Village" with an allocation of 400 houses. This does not meet the criteria in Core Policy 3.	acknowledges that Great Coxwell is incorrectly referenced within CP 4, which should be corrected.
Larger Village Designation – Cumnor	Cumnor lacks the facilities to be designated a Large Village and to support development on the scale proposed. Cumnor Parish is large, but Cumnor village, which acts as the village element, containing historic buildings, churches, shops, memorials, and community buildings, is very small. To develop area 6 extensively would create an irreversible semi-urban area where the traditional components become irrelevant.	The Council is confident that its methodology for identifying a Settlement Hierarchy is robust. Cumnor contains appropriate services and facilities to justify the Larger Village classification and this designation is considered appropriate.
Larger Village Designation - East Hanney	East Hanney does not meet all the necessary criteria to be categorised as a Large Village. East Hanney just scored in the large village category with a score of 14. If it loses the mobile library as is threatened then it will fall out of the Larger Village category by the Vale's criteria and would not be considered for development. The village has one shop, staffed by volunteers, and lacks facilities and infrastructure to support new development.	The Council is confident that its methodology for identifying a Settlement Hierarchy is robust. East Hanney contains appropriate services and facilities to justify the Larger Village classification and this designation is considered appropriate.
Larger Village Designation – Harwell Village	<p>The designation of Harwell Village as a 'Larger Village' in the Local Plan is questioned since it has a low level of facilities. Harwell Village should be re-defined as a 'Smaller Village'; based on the definitions within the Plan and the housing allocation reassessed according to "development should be modest and proportionate in scale and primarily be to meet local needs".</p> <p>The Plan makes a distinction between Harwell Village and Harwell Campus and the employment opportunities afforded by the Campus should not be considered in the housing demand for the Village.</p>	The Council is confident that its methodology for identifying a Settlement Hierarchy is robust. Harwell contains appropriate services and facilities to justify the Larger Village classification and this designation is considered appropriate. Harwell Village and Harwell Campus are clearly defined and treated separately within the plan.
Larger Village Designation – Sutton Courtenay	Sutton Courtenay should be removed from the larger villages list on the basis of lack of sustainability. There is inadequate road, water, sewerage and public transport, so the village is not in reality a site for sustainable development.	The Council is confident that its methodology for identifying a Settlement Hierarchy is robust. Sutton Courtenay contains appropriate services and facilities to justify the Larger Village classification and this designation is considered appropriate.

Category	Summary	Council Response
Larger Village Designation - Uffington	Uffington should not be classified as a 'larger village'.	The Council is confident that its methodology for identifying a Settlement Hierarchy is robust. Uffington contains appropriate services and facilities to justify the Larger Village classification and this designation is considered appropriate.
Larger Village/Local Service Centre Designation – Uffington	<p>Information relating to a hierarchy of settlements in the Western Vale is inconsistent. Core Policy 3 refers to Uffington as a “Local Service centre”. Fig 4.2 describes it as a “large village”. All previous plans have described it as a Large Village. Uffington is much smaller with far fewer services (hardly any in fact) than places like Botley and Grove. There seems to be a similar error in relation to other places including East Challow and Watchfield.</p> <p>Lack of evidence to support classification of settlements in the hierarchy. For example, how can both Botley and Uffington be “Local Service Centres” when the latter is a small rural village in an important historic environmental setting has “a more limited range of employment, services and facilities”, virtually no employment opportunities and very limited services?</p> <p>Uffington should be reclassified as a Smaller Village rather than a Larger Village because of its unique proximity to the AONB and White Horse Hill and the rural nature of roads serving the village.</p>	This is a formatting/ printing error. It is clear that these villages are classified as larger villages as indicated on Figure 4.2.
Larger Villages designation	Too much emphasis is placed on “larger villages”. There is no such definition in law and their arbitrary designation is not sufficient to support adding several thousand houses identified in another part of the plan to existing communities of 450 houses.	The Settlement Hierarchy is consistent with the NPPF and provides a clear and appropriate approach to planning for development in the Vale.
Local Service Centre definition	Whilst we raise no objection to the classification of local service centres, the definition is unclear in its reference to local service centres being defined as larger villages which are themselves a separate category of settlement.	The designation of Local Service Centre for Botley and Grove recognises their role within the Vale and ensures an appropriate level of development and services and infrastructure can be planned at these locations.

Category	Summary	Council Response
Local Service Centre Designation – East Challow, Shrivenham, Stanford-in-the-Vale, Uffington and Watchfield	There is a discrepancy between the printed copy of the Local Plan and the web-based version. In the printed copy East Challow is a Local Service Centre. In the web-based copy there is no mention of Local Service Centres, simply larger villages. This may be a misprint-print, but if not, it is inappropriate that East Challow should be considered as a Local Service Centre. Due to its proximity to Wantage it cannot even support a local shop. The Settlement Hierarchy on Page 37 is incorrect for the Western Vale Sub-Area as it shows East Challow, Shrivenham, Stanford-in-the-Vale, Uffington and Watchfield under Local Service Centre when you really mean they are Larger Villages. This is obviously a mistake. Core Policy 3 is inconsistent with Figure 4.2. Core Policy 3 describes East Challow, Shrivenham, Stanford-in-the-Vale, Uffington and Watchfield as 'Local Service Centres'. This cannot be correct; all previous plans have described these as Large Villages.	This is a formatting/ printing error. It is clear that these villages are classified as larger villages as indicated on Figure 4.2.
Market Towns – Faringdon	Core Policy 3 Settlement Hierarchy: states that market Towns have the ability to support the most sustainable patterns of living through their current levels of facilities, services and employment opportunities. This is not true for Faringdon.	Faringdon is the largest settlement within the Western part of the Vale, it functions as a service centre and is clearly the most sustainable settlement in the area. Directing additional development at Faringdon will help to provide support to the existing services and facilities within the town and to help deliver new and improved services and facilities
Methodology	The methodology for classifying larger and smaller villages is flawed. Sustainability points take no account of the capacity of facilities which may be outside Council control. If a bus service or post office closes, sustainability (based on the Vale Town and Village Facilities study) could fall and move a village from the larger to the smaller category. By the Vale's classification this would render it unsustainable for the same level of development. There is a big difference within the larger village category between the size, character and facilities of each village. Cumnor has more in common with Appleton than with Kennington or Wootton, yet Cumnor and Kennington and Wootton have the same classification, whereas	The Council consider that the methodology is clear, robust and appropriate. It is not necessary for the facilities within one settlement to be identical to another with the same classification, but that their role is consistent, and based on the facilities falling within the same range. Botley clearly functions as a 'service centre' on the edge of Oxford, whereas Faringdon clearly functions as a 'market town' having higher order facilities and services to its surrounding rural hinterland.

Category	Summary	Council Response
	<p>Appleton does not. This approach is an inadequate basis for assessing sustainability.</p> <p>We question a hierarchy which places Botley (as a Local Service Centre) lower down than Faringdon (a Market Town) when you compare their relative facilities, services and employment opportunities. The classification of “Market Town” assumes facilities, services and employment opportunities are similar for Abingdon, Wantage and Faringdon when they are not.</p>	
Methodology (1)	The Council is confident its methodology for developing the Settlement Hierarchy is robust and is consistent with the National Planning Policy Framework. Indeed, it is underpinned by the planning principles of focusing growth towards the larger, most sustainable settlements and towards the area where employment growth and infrastructure delivery will be directed. Harwell Campus has services and facilities equivalent to a larger village, and is, in the opinion of the Council, a sustainable and suitable location for development.	The Council is confident its methodology for developing the Settlement Hierarchy is robust and is consistent with the National Planning Policy Framework. Indeed, it is underpinned by the planning principles of focusing growth towards the larger, most sustainable settlements and towards the area where employment growth and infrastructure delivery will be directed. Harwell Campus has services and facilities equivalent to a larger village, and is, in the opinion of the Council, a sustainable and suitable location for development.
Milton Heights	Development at Milton Heights would extend Didcot westwards and be in open countryside unrelated to a Large Village. It would adversely affect the setting between Didcot, Harwell Village and East Hendred. Sites 12 & 13 comprise Large Scale development in the AONB which the NPPF requires to be justified by special circumstances. There are no special circumstances given that Harwell Campus (c.285 hectares) provides sufficient land employment, and the existing 2006 Local Plan allocation for 400 dwellings, which has not been implemented over 8 years of the Plan period.	Milton Heights is considered to be a sustainable location to support strategic growth, being located between two large centres of existing and expanding employment and benefiting locally from a range of services and facilities.
North Hinksey mapping	Figure 5.1 Subject to comments on policies Core Policy 3 omit North Hinksey as “smaller village” from the Figure map. The identification of North Hinksey as smaller village on figure 5.1 is inconsistent with the higher level Adopted Policies Map which makes no reference to North Hinksey on the basis that it forms part of the Botley inset,	Agreed.

Category	Summary	Council Response
Revise East Challow and Wantage settlement boundaries	Settlement Boundary for Wantage and Grove should be updated to reflect recent development at Stockham Farm	Agreed
Role of Larger Villages and Local Service Centres	<p>Further explanation of the role Local Service Centres and Larger Villages can play is required. Larger villages are sustainable enough to accommodate District wide housing growth. The policy needs to state this.</p> <p>The explanatory text for Large Villages states that unallocated development will be limited to providing for local needs and to support employment, services and facilities within local communities. The word 'local' should be removed from this explanatory text which should state that Large Villages have good long-term potential for development to provide homes to help sustain, and where appropriate, enhance their services and facilities to support viable, sustainable communities in a proportionate manner.</p> <p>Core Policies 3 & 4 should be amended to exclude the limitations to local needs requirement for such sites only to be accepted through a local plan or neighbourhood development plan.</p>	<p>The designation of Local Service Centre for Botley and Grove recognises their role within the Vale and ensures an appropriate level of development and services and infrastructure can be planned at these locations.</p> <p>CP3 is clear that 'unallocated' development will be limited to providing for local needs.</p>
Role of Smaller Settlements	Shippon is classified as neither a large or small village within the Local Plan. P37 states '...villages not included within the categories described above are considered to form part of the open countryside where development will not be appropriate, unless consistent with the exceptions policies set out in the Local Plan.' The Parish Council is concerned that two redundant farmyards [brownfield sites], which have had some commercial use on them, have been excluded from consideration in the current Local Plan, Part I despite their being recommended for redevelopment in the Shippon Village Plan and sustainable developments within the brown line defining the village area. To how many other villages within the Vale would this apply	Shippon is clearly designated as a 'smaller village' The role of the smaller settlements is clear. No revision is considered necessary or appropriate.

Category	Summary	Council Response
	<p>to? Restricting housing development in the smaller villages and towns, forces development into settlements in the Green Belt and AONB. This may generate legal challenges and widespread opposition and render the plan's objectives undeliverable. Show more flexibility over housing development in the smaller communities. Core Policy 3 fails to recognise the important role development at the lowest order settlements (ranked below the four tiers of the settlement hierarchy) have played in maintaining the supply of housing in the Vale. The plan's Glossary states "Smaller villages have a low level of services and facilities, where any development should be modest in scale and primarily be to meet local needs". Accordingly there is no need in the policy to limit development within smaller villages to "infill". It should only be development that is limited and as the Glossary confirms "modest in scale" having regard to the location of the settlement and access to services and facilities. There needs to be sufficient flexibility to deliver development in the most sustainable locations. Our client seeks the following amendment to the plan (bold text is new proposed text): "Core Policy 3: Settlement Hierarchy Smaller Villages The Smaller Villages have a low level of services and facilities, where any development should be modest and, proportionate in scale and to the level of sustainability for each smaller village and should primarily meet local needs supporting village services and facilities. "Regarding your proposals for the Smaller Villages within the Vale, we refer you to our response to your February 2013 consultation where we believe the detail needs to be firmed up. We agree with your policy for the villages not included within the settlement hierarchy categories, i.e. Bourton, that they are considered to form part of the open countryside where development will not be appropriate.</p>	

Category	Summary	Council Response
Role of windfalls	Paragraphs 4.7-4.15 fail to reflect the role that windfalls in settlements ranked below the four tiers of the settlement hierarchy (para 4.7) have played in the past in maintaining the supply of housing in the Vale	The purpose of the Local Plan 2031 is to provide a strategic policy framework for development in the Vale for the period up to 2031.
Science Vale Area - AONB	<p>The VWHDC Plan uses the basis of speculative potential employment opportunities at Harwell Oxford Campus as a justification to build 1400 of houses adjacent to the site within North Wessex Downs AONB. This building would result in the creation of a new “Larger Village” or “Small Town” predominately within the AONB</p> <p>Lack of detail in the overarching policy document could be a source of confusion over the protection given to AONBs</p> <p>The diagram on page 41 of the local plan highlights the Science Vale area but fails to show the AONB, thereby giving the impression that a large amount of land within the AONB could be available to development.</p>	The economic potential for the area is clearly set out within the supporting evidence base (e.g. SQW/CE Economic Projections work informing the Oxfordshire SHMA). The justification for development adjacent to Harwell Campus is set out elsewhere, particularly in relation to CP 15.
Settlement Hierarchy	The hierarchy concentrates new development on locations which appear to be sustainable in their own right but seems to ignore the fact that the whole District is really just a number of large housing markets, none of which is a single settlement. Sustainable communities are formed by groups of settlements working together and it is damaging to try to reject any form of new development apart from “exception cases” because all settlements of whatever size can, and do contribute to the liveliness variety and interest of the whole area. One of the problems with relying on large allocations of land for housing is the fact that only the large national house builders are able to develop such sites. Small local builders are squeezed out of the market. This reduces the variety and range of dwellings available and erodes local distinctiveness. The very small settlements which fall below the threshold of “smaller village” are an important part of the character of the Vale, and they do contribute	The Settlement Hierarchy clearly focuses development to the larger and more sustainable settlements, and where there is greatest potential for economic development and infrastructure delivery. Protecting the more rural parts of the Vale is an important part of the overall strategy and is consistent with a wide range of consultation responses to earlier stages of plan preparation.

Category	Summary	Council Response
	to, and support nearby larger settlements. The opportunities for new development in such locations is very limited but they will shrink and lose their identity if they are forced to rely just on the “exceptions” policy. The policy should allow for one or two dwellings in such settlements with perhaps an annual limit.	
Settlement Hierarchy – North Hinksey and Botley	North Hinksey is functionally and physically part of Botley. This should be reflected in the Settlement Hierarchy Policy. In the alternative, North Hinksey is within a short walking/cycling distance of facilities offered in a higher order settlement (See Plan WB1) that should be acknowledged in the settlement hierarchy to be effective and sound.	North Hinksey is a separate settlement. The settlement of Botley falls partly within the North Hinksey parish.
Smaller Village Designation - Appleton	Appleton as a Smaller Village is not justified, when assessed against the evidence base. The respondent’s position is that the village should be seen as a large village in that it has more in common with a ‘small’ larger village.	The Council is confident that its methodology for identifying a Settlement Hierarchy is robust. Appleton contains appropriate services and facilities to justify the Smaller Village classification and this designation is considered appropriate.
Smaller Village Designation - Great Coxwell	Role of Great Coxwell. Inconsistency between CP3 and CP4.	This is a formatting/ printing error. It is clear that these villages are classified as larger villages as indicated on Figure 4.2.
Sub Area Classification - Sutton Courtenay	An inconsistency in the plan needs addressing. The mapping shows the village within the South East Vale Sub-Area, but Policy 3 shows the village within Abingdon-on-Thames and Oxford Fringe Sub- Area. We support the inclusion of Sutton Courtenay in South-East Vale sub-area, due to its wider rural setting and characteristics, geographical location and evidence within the Landscape Character Assessment.	Drafting error. Agree this needs to be corrected.
Support designation of East Hendred as a Larger Village	Agree that the Settlement Hierarchy should designate East Hendred as a Large Village.	Support Noted.
Support designation of Abingdon as a Market Town	Support the Council’s approach in classifying each settlement within the settlement hierarchy, with growth being directed to those considered more sustainable. We especially support the identification of Abingdon-on-Thames as a Market Town.	Support Noted.

Category	Summary	Council Response
Support designation of Botley as a Local Service Centre	Oxford Preservation Trust raises additional concerns on the future development of Botley. We support the categorisation of Botley as a Local Service Centre which given its location on the fringes/within the suburbs of the city of Oxford works with the wider designations for the Vale of White Horse	Noted.
Support designation of Drayton as a Larger Village	Bloor supports the categorisation of Drayton as a larger village under Core Policy 3.	Support Noted.
Support designation of East Challow as Local Service Centre and Wantage as a Market Town	Support Noted.	East Challow is classified as a 'Larger Village'. There is a drafting / printing error in CP3 which needs amending.
Support designation of Faringdon as Market Town	Core Policy 3 Support is given for the identification of Faringdon as a Market Town within the settlement hierarchy.	Support Noted.
Support designation of Kennington and Radley as Larger Villages	Redrow Homes endorse the designation of Kennington and Radley as 'Larger Villages' in the Abingdon-on-Thames and Oxford Fringe Sub-Area.	Support Noted.
Support designation of Radley as Larger Village	Development of the proposed North West Radley allocation, or the potential development of an enlarged allocation incorporating the omitted North Radley site, will serve to support and enhance the vitality of the village and deliver growth in a sustainable fashion in order to sustain and improve existing facilities to the benefit of both new and existing communities. Policy CP3 is considered sound.	Support Noted.
Support designation of Shrivenham and Cumnor as Larger Villages	Draft Core Policy 3 classifies Shrivenham and Cumnor as Larger Villages. We support the position of these settlements in the hierarchy and note that in addition to allocated development – new development will be permitted where it meets local needs and to support employment, services and local communities.	Support Noted.
Support designation of Shrivenham as a Local Service Centre	Shrivenham's designation as a Local Service Centre in Core Policy 3 is supported. However, the designation conflicts with Figure 4.2 and other parts of the Plan which show it as a Larger Village. These anomalies need to be addressed.	This is a formatting/ printing error. It is clear that these villages are classified as larger villages as indicated on Figure 4.2.

Category	Summary	Council Response
Support designation of Sutton Courtenay as a Larger Village	The designation of Sutton Courtenay as a Larger Village is supported.	Support Noted.
Support identification of Wantage as focus for sustainable growth	We support Core Policy 3 Settlement Hierarchy in recognition of the sustainable location of Wantage for housing growth.	Support Noted.
Support Policy CP3	Linden fully supports the neighbouring Shrivenham allocation for 500 houses and Core Policy 3 which classifies Shrivenham as a Local Service Centre within the Western Vale sub area.	Support Noted.
Support the Settlement Hierarchy	We support the Council's view that Abingdon should be a key focus for sustainable housing growth within the Vale. The Spatial Strategy, Sub-Area Strategies and Settlement Hierarchy which focus strategic housing growth at the three Market Towns (including Abingdon) is supported and is considered to comply with the Government's drive for delivering sustainable development.	Support Noted.
Support the Settlement Hierarchy and designation of Faringdon as a Market Town	Welbeck Strategic Land LLP support the spatial distribution and settlement hierarchy, specifically the identification of Faringdon as a Market Town within the Western Vale Sub Area.	Support Noted.

Core Policy 4: Meeting our Housing Needs

Category	Summary	Council Response
Coalescence	Need to prevent coalescence between settlements and help them retain a distinct identity and character, e.g. between Faringdon/ Great Coxwell and Didcot and surrounding villages. The Plan offers no protection to the ancient village of Harwell from coalescence with Didcot. There is no clear boundary map within which building will not be permitted – words cannot offer clear interpretation. A map should be provided. Include a policy in the Local Plan to prevent building on important areas of green space between villages to prevent coalescence, i.e. as in Shrivenham and Watchfield now only divided by a golf course. Other villages will also need this protection.	The plan includes a policy requirement for the proposed Strategic Growth at Valley Park to carefully treat the rural edge of Harwell Village and ensure the separate identities of Valley Park and Harwell Village are protected. A similar policy approach is set out for development proposed at the southern and western edges of Faringdon.
Consultation	Around 125 comments regarding consultation. The report about the consultation process ignores important procedural and policy challenges, and understates public opposition. The Plan is unsound because it is not justified by robust evidence. Therefore lower housing figures (based on Government household projections) should be used and site allocations removed from the Green Belt and AONB. Concern that VWHDC denied the general public access to comments made as part of the earlier Local Plan consultation until literally days before the current Nov '14 exercise began. Consultation has been flawed because 500 responses about the proposals for Radley were counted as one objection. Concentrate on areas where expansion would be beneficial. Consider Garden Cities. Consultation has been inadequate for changes of the magnitude proposed and suggested lack of engagement between the council and developers risks the intent of strategic statements Online submission system is almost impossible to use with many problems with the Vale's website. The consultation process imposed by the VOWH is seriously flawed, misleading and complex, excluding a vast majority of the community with too much information released, short time span in particular for parish councils to notify local residents, consultation meetings were inadequately resourced, not enough warning and not enough detail on the leaflets in particular the	The council has worked hard to ensure its consultation processes have complied with regulatory requirements and are consistent with the Councils SCI. During 2013 and 2014, the council carried out two stages of Local Plan consultation that were entirely voluntary and not required by legislation. These stages of consultation were carried out in an effort to maximise the opportunity for stakeholders and members of the public alike, to engage with, and contribute to the plan making process. The council considers that the plan is supported by an up-to-date and robust evidence base.

Category	Summary	Council Response
	implications around the greenbelt. Concerns raised regarding a number of views being ignored and lack of notice in regards to the proposed sites, in particular the views from Cumnor, Peachcroft residents were unaware of the plan to build on 12 Acre Drive, representations were ignored with respect to the scale of development, impact on AONB and Green Belt and concerns over A420	
CP15 - Wantage and Grove	The proposals double the size of Wantage and Grove. Developers should be penalised for land banking.	Noted.
CP4 - Harwell Campus	The proposed allocation of 1,400 houses, the majority on greenfield land, in North Wessex Downs AONB, the largest greenfield allocation in any National Park or AONB in the UK, is not the most appropriate when considered against alternatives, conflicts with the NPPF and CROW Act and is therefore unsound. The environmental impact of the two proposed sites within the North Wessex Downs AONB have not been properly assessed and the increased light, noise and pollution cannot be fully mitigated. The cumulative environmental impact of the East Harwell Campus and the North Harwell Campus have not been considered. In the various landscape assessments of the AONB sites, there is no evidence of “great weight” being applied to AONB characteristics when evaluating the selection of sites. Rather than propose to build 1,400 houses at Harwell Campus East and Harwell Campus North develop Valley Park and Didcot A which have the capacity. Delivery of housing will not match employment growth at Harwell Oxford Campus, making the plan unsound. Harwell Oxford Campus have their own more sustainable vision for the Campus, supported by local people. Their masterplan integrates housing within the Harwell Oxford Campus perimeter and enables the Harwell Oxford Campus to house visiting academics and contract workers.	The Council is satisfied that the justification for development at Harwell Campus is robust and appropriate. This matter is considered in more detail in relation to CP15.
CP4 - SHMA - Smaller Sites	It is concerning that the Council’s evidence base does not identify clearly the 3,169 “known commitments” which form part of the provision to meet the overall 20,560 dwelling requirement. It would assist all parties for this information to be made available, as without	Both existing commitments and completions have been clearly included in all calculations to determine future housing requirements and these are all set out within the

Category	Summary	Council Response
	scrutiny it is not clear what this part of the supply is specifically comprised of (and whether there is any double counting), and if this results in any shortfall that may need to be addressed (to make the plan effective and sound) by additional Part 1 or Part 2 allocations.	Local Plan and the supporting evidence base (Housing Topic Paper).
CP4 – Support	The Freeholder supports CP4 and considers it to be sound.	Noted.
CP4 – Unmet Need	The housing requirement of Core Policy 4 is unsound for failing to address Oxford's unmet housing needs at the current time. Policy CP4 (footnote) refers to joint working with other Local Authorities regarding unmet need. Imprecise wording could lead to delays in meeting Oxfordshire's unmet housing need. The Plan would not comply with Duty to Cooperate.	Un-met need for Oxford is dealt with by inclusion of a specific policy (CP2). This matter is discussed in more detail in relation to CP2.
General Comment	Housing requirements Core Policy 4 (Meeting our housing needs) acknowledges that 1,900 dwellings remain to be identified and will be allocated through the Local Plan Part 2, Neighbourhood Plans or the Development Management process. Given the level of housing need the plan should be as flexible as possible in allowing this housing need to be met as soon as possible, Houses already built need to be included in the average projected numbers Part 1 + Part 2	Noted. Commitments and Completions are already included in the council's calculations and these are clearly set out within the Housing Topic Paper. CP 4 is clear that housing over and above the strategic requirement allocated by the Local Plan Part 1, can come forward either through the Development Management process, to be allocated in Neighbourhood Plans, or to be allocated in the Local Plan Part 2, where necessary and appropriate.
General Comment – Affordability	Housing in Abingdon is expensive. Will the developers be able to sell the new ones? New jobs will go to young(ish) people entering the job market. Many are paying off student loans so will not be able to buy these houses. Is there a link between average salaries and house prices? Building more houses does not improve their affordability. The Plan will only boost the profit of house builders.	The affordability of housing has been considered in preparing the Oxfordshire Strategic Housing Market Assessment. This has informed both the requirement for 'affordable' and market housing. The relatively poor level of affordability of housing in Oxfordshire, has therefore been one of the most significant drivers behind the new housing target for the district and county.
General Comment – Affordability (2)	Building large numbers of homes won't meet local need but will attract more people to Oxfordshire who work in London pushing prices up and making housing less affordable to local people.	The housing target for the district has been informed, in part, by a detailed assessment of employment growth across the district up to 2031. Considerable effort has been directed at ensuring that housing and employment growth is balanced across the district, both within the Science Vale

Category	Summary	Council Response
		area and the rest of the district. Increasing housing supply, of both 'affordable' and market housing, will provide more opportunities for local people to both live and work more locally, rather than having to move away.
Housing Delivery	Overreliance on the private sector and lack of measures to assess how objectives will be achieved and developers will deliver what they have promised. To address the current severe housing delivery shortfall (some 5,000 homes required on new sites within 5 years in addition to existing commitments) it is necessary that some assessment is made of delivery 2015 - 2020 from each identified site, but there is none. There must be serious doubt that such delivery can be achieved so that the Framework's requirement will not be satisfied	A detailed housing trajectory is included within the Housing Topic Paper that has, in part, been informed by an independent assessment of market forces and housing delivery for the district as a whole and for each proposed site. Housing delivery has therefore informed the portfolio of sites being proposed to ensure that a 5 Year Housing Land Supply is both achieved and maintained.
Housing Target - SHMA	Over 400 comments were received relating specifically to the housing target set out within the SMHA. The main comments received include: <ul style="list-style-type: none"> • The basis of the Local Plan job growth and housing requirement is unsound. The SHMA overstates housing need in the Vale. The level proposed – 20,560 homes by 2031 - is twice the government's household projection. • The projection for job growth which informs housing figure is unsustainable and unrealistic. Issues include: double counting, inconsistency between economic and housing growth assumptions. • Inadequate consideration has been given to social, environmental factors or infrastructure. Uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs AONB. • Concern that Central Government can impose on a town a requirement to build huge numbers of houses whose existence will totally alter the character of the existing settlement. • There seems to be a great deal of speculative thinking to produce huge numbers of jobs and houses, but no provision made for periodic recession, and reductions in growth. • The SHMA is flawed. Review the SHMA but do not sacrifice the Green Belt. • According to Planning Inspector Jonathan King the SHMA must be rigorously tested in order to establish that it is robust. 	The Council considers that the SHMA is up to date, fit for purpose, robust and consistent with national policy requirements. The Council is required to meet the Objectively Assessed Need in full and is planning to do so with a sustainable strategy for economic led growth. The SHMA has been informed by a comprehensive assessment of economic growth projections and the plan has been informed by an independent assessment of the market and housing deliverability. An independent Green Belt Review has been undertaken, in accordance with the NPPF, and concluded that some sites no longer meet the purposes of the Green Belt. If the Planning Inspector agrees with this position, these sites should not be considered as being within the Green Belt and would therefore constitute greenfield land, no different to any other. The NPPF allows development in the AONB providing certain criteria can be met. The Council has demonstrated that there are exceptional circumstances to justify the proposed development that would in any case not lead to significant harm to the AONB.

Category	Summary	Council Response
	<p>SHMA figures should only be taken into account, alongside figures derived from published government household projections using the most probable values for all input parameters rather than extreme figures. • build rates to achieve the target are unrealistic – this policy takes no account of the availability of raw materials such as bricks, or skilled building labour needs – both in short supply. • The SHMA has been taken too strict/exact with no room for flexibility and should have been analysed against social, environmental and infrastructure considerations. Suggestions that a housing target range should be used. • More thought should be given to changing housing market and industry structures to provide genuine solutions to those in need of affordable housing. Suggested that houses in the Vale remain unsold so why the need to propose more. • Oxfordshire Strategic Economic Plan (SEP), which is the basis of the SHMA, has not been subject to public consultation or any independent scrutiny. • Need confirmation that the expected economic and population growth forecasts will at least be true for the first two years of the Plan period.</p>	
Housing Target – Support	<p>A number of comments provided support to Core Policy 4. These included: • We support the housing target for at least 20,560 homes to be delivered in the plan period and the inclusion of the Abingdon-on-Thames and Oxford Fringe Sub-Area, in particular the North West Abingdon-on-Thames strategic allocation. Concern that opportunities to increase the numbers on-site may have been overlooked. The Planning Practice Guidance describes an appropriate methodology for the assessment of future housing requirements. • Need to build more houses. The current high house prices are an impediment to growth. • In principle we are in favour of more good housing, especially at lower prices • We welcome and fully support the Council’s proposal to address in full the evidenced housing needs arising in the Vale of White Horse. Furthermore, we support the District Council’s pragmatic approach to addressing any unmet needs arising elsewhere in the Oxfordshire Housing Market Area. Support Spatial Strategy and Sub-</p>	Noted

Category	Summary	Council Response
	<p>Area Strategies. Redrow Homes have suggested the inclusion of a signpost to the 'Ring Fence' within the South East Vale Sub-Area which would be helpful in understanding the significant amount of growth planned for this area. • We welcome and support the Council's proposal to address in full the evidenced housing needs arising in the Vale of White Horse. • We support the proposal to progress with the Local Plan (Part 1) on the basis of meeting the District's own objectively assessed housing needs, whilst working with other Oxfordshire authorities to address any unmet needs in the wider Housing Market Area. • In the context provided by the City Deal it is entirely appropriate for the objectively assessed need to be met in full in the Vale of White Horse district. • We fully support the Council's proposal to address in full the evidenced housing needs arising in the Vale of White Horse. Furthermore, we support the District Council's pragmatic approach to addressing any unmet needs arising elsewhere in the Oxfordshire Housing Market Area. The full merits of the proposed allocation at North Abingdon are addressed in the covering letter that accompanies this representation. • Subject to our comments above regarding the Oxford City housing requirement, we support the housing target for the Vale District providing for the full objectively assessed needs of the Vale as set out in the SHMA. However Redrow Homes suggest modifications are made to Core Policy 4 in order to emphasise that land will be considered for release from the Green Belt where it does not fulfil the purposes at paragraph 80 of the NPPF</p>	
Non-Strategic allocations	A further 1900 dwellings remain to be identified through the Local Plan Part 2, Neighbourhood Development Plans or the Development Management process. The county council will advise on the implications of further housing development as proposals are submitted. Further expansion of village schools is likely to be required.	Noted
Non-Strategic allocations – General Comment	The county council in principle supports the proposed allocation of smaller nonstrategic sites (0-199 dwellings) through the Local Plan Part 2.	Noted

Category	Summary	Council Response
Objection to allocation/development South of East Hanney	<p>Objections to the allocation include the following reasons: Impact of the allocation on the Letcombe Brook, including its ecology and biodiversity Existing flooding issues will be exacerbated through further development .Allocation will negatively impact on the existing character of the settlement .Archaeological sensitivities relating to this site Development will negatively impact upon the local road network of the village and also that of the A338Concerns with how the site will be accessed The existing school is at capacity with some having to commute elsewhere at present Local sewerage treatment works is at/over capacity at present Not enough local services and facilities to accommodate the growth Lack of sustainable transport routes such as cycleways and pedestrian routes linking the site to the existing settlement and to employment locations, leading to a dependence on the private motor car No local employment capability in the village Many objections state that as a result, the strategic site would be contrary to the NPPF and also to local plan policies Will negatively impact on the medical facilities available in the area Development would result in the loss of high quality agricultural land Objections to the village's allocation as a Larger Village in the settlement hierarchy Comments from Berks Bucks Oxon Wildlife trust and other consultees stating that the site is a Traditional Orchard priority habitat, and the last remaining such site in the settlement. Would lead to a significant increase in the total number of houses in the village Comments include a number of those made by East Hanney Parish Council The vast majority of suggested modifications to make the plan sound seek the removal of the strategic site allocation South of East Hanney</p>	<p>The Council consider the site South of East Hanney to be a sustainable location for development which is supported by a robust site selection process as demonstrated within the Strategic Sites Selection Topic Paper (TOP03) which demonstrates biodiversity, archaeology and transport has been thoroughly considered within the process amongst other considerations. The Council are satisfied the Plan identifies the necessary development and infrastructure requirements to enable and support growth in particular through the Site Development Template, CP12 and the Infrastructure Delivery Plan (DLP07). The Council will also continue to work with Oxfordshire County Council and other relevant parties to ensure the necessary infrastructure is provided as outlined in the Plan. In response to specific concerns, the Template sets out the need for the siting of development to take consideration of the Letcombe Brook, not impact on the Priority Habitat nearby, drainage strategy to be required, mitigation to minimise impacts on landscape setting, contributions and/or improvements to bus services, road junctions, ensures adequate access and contributions towards increasing capacity of primary school. East Hanney is considered a Larger Village as demonstrated through the Town and Village Facilities Study Update (COM04).</p>
Policies Map	<p>Seek amendments to the Policies Map for South East Vale Sub Area. CP4 Development Boundary. The defined Development Boundary around Wantage and Grove as drawn is illogical and inconsistent and will lead to anomalies in the future. Saved Policy NE10 Important Open Land - the definition of the boundary has been modified on the Policies Map and this representation seeks a further modification. Land at</p>	<p>Agreed.</p>

Category	Summary	Council Response
	Stockham south of the canal has now been excluded from this definition and this is supported. However further land which wraps around the western edge of Wantage and links with the excluded area at Stockham should also be excluded. This is indicated on the attached plan.	
Policy Wording	We welcome the fact that the housing target figure is expressed as being 'at least'. If a proposal passes the NPPF test of sustainability it should be permitted. Location is only one matter that feeds into an assessment of sustainability. Policy wording should be amended to reflect NPPF phrase relating to development outside the existing built area of settlement; 'special circumstances' and not the phrase 'exceptional circumstances' as set out in CP4. English Heritage suggests wording in order to set out a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by the NPPF paragraphs 126 and 157.	<p>The Council consider that the policy wording is appropriate in the context of the VOWH. It is clear that the presumption in favour of sustainable development will apply within the built areas of Market Towns, Local Service Centres and Larger Villages, the Council consider this to be consistent with the NPPF.</p> <p>In terms of the point made by English Heritage; the Council consider the current policy wording to be adequate.</p>
Reasonable alternatives	An absence of 'reasonable alternatives'. The Plan should be amended to provide: for at least biennial confirmation that expected economic and population growth forecasts are on track and the capability to amend the programme in the light of these. The absence of 'reasonable alternatives' such as those explored in the Local Plan 2029 Part 1. Those alternatives applied before the SHMA was published and now irrelevant. They cannot therefore be described as 'reasonable' and need to be replaced.	Plan preparation has included all standard plan making stages, including 'issues and options' preferred options' and draft plan stages. A series of 'reasonable alternatives' have been developed and comprehensively tested, including through the SA/SEA processes.
Ring Fence and Delivery	The Ring-fence and implications of failed supply are unclear. In the absence of high-level sub regional justification the housing supply ring fence is contrary to the NPPF requirement that local plans should meet the full objectively assessed need for in the housing market area. There is no evidence that the proposed ring fenced part of the district constitutes a distinct or identifiable housing market area. In this context suitable potential alternative smaller strategic allocations should be identified which are demonstrably deliverable early in the plan period. GDL has concerns whether allocations can realistically be	The Housing Supply Ring Fence seeks to ensure that strategic housing growth and infrastructure is delivered in the most appropriate location; focused on the Science Vale area. It is clear that a Five Year Supply will be established for the full district area, as required by the NPPF. However, the benefit of the Ring Fence, is that a loss of a Five Year Supply within the Ring Fence area would only affect the Ring Fence area. This approach therefore ensures that housing delivery continues to come forward in the Science Vale area inline

Category	Summary	Council Response
	delivered within the timescales envisaged. If these concerns are borne out, the ring fence policy would not enable the Council to have flexibility to achieve a higher rate of housing development elsewhere in the District to compensate. To achieve objectives for housing supply and provide for contingency in the event that large sites in the Science Vale do not come forward, it will be essential to direct further growth to sustainable locations elsewhere in the District. The Council needs to justify the policy better and clarify how it will operate alongside maintaining supply in the rest of the district and what contingency measures might be brought into play if this mechanism fails. We would like a clause stating that if sites within the ring fenced area become undeliverable, sites, especially brownfield sites outside the ring fence would be considered for development. Reliance upon an artificial 'ring fence' related to housing delivery through major allocations, a mechanism considered necessary because their deliverability is in doubt. Modifications are sought to the Allocations under Core Policy 4 to delete sites within the green belt and AONB and to substitute sustainable non AONB and Green Belt sites, including this site at Southmoor.	not only with the Local Plan, but the wider Strategic Economic Plan for Oxfordshire.
Settlement Boundary – Harwell Campus	Establishing Harwell Campus with a settlement boundary would result in a more clearly defined settlement, and would ensure growth within the area is sustainable.	The Council do not consider that a lack of defined development boundaries at larger villages leads to any lack of clarity. However the Council does recognise that Harwell Campus is an exceptional case where an alternative approach may be justified. The Council would be willing to consider if a further modification would help provide clarity to this matter through the examination process.
Spatial Strategy	A number of comments were received relating to the Spatial Strategy. These include: • Objection to the proposed presumption against development outside built up areas of Market Towns, Local Service Centres and Larger Villages in Core Policy which is contrary to the NPPF which is clear that sustainable development should go ahead without delay. • Spatial strategy is unsound. The policy is not positively	The Council have prepared an ambitious, yet realistic strategy for growth, which is compliant with national policy and is consistent with wider strategies for Oxfordshire, including for example, the Strategic Economic Plan. The plan is based on up-to-date evidence that is fit-for-purpose and supports the delivery of the Objectively Assessed Need for

Category	Summary	Council Response
	<p>prepared or justified as it does not seek to address unmet housing requirements from neighbouring authorities and is insufficiently flexible to meet the housing target. Allocate additional sites for housing in the Local Plan. • The strategy fails to protect the environment, build healthy, sustainable communities, support sustainable transport and accessibility or economic prosperity (apart from developments adjacent to “Science Vale”). Need a strategy like the two previous Local Plans which concluded that locating most development in Abingdon, Botley, Faringdon, Grove and Wantage and limiting it elsewhere was the most sustainable strategy. • Four development sites in the Green Belt have been identified to accommodate over 1,500 houses and two sites in the AONB for 1,400 houses. Proposals to develop in the Green Belt and AONB are a threat to the rural character of the Vale and conflict with the NPPF. • There is a potential to identify more housing sites in light of the wider housing need within Oxfordshire, and significant amount of surplus employment land available. • Lack of any explanation in the Plan as to why the 200 home capacity threshold has been decided upon and why smaller allocations of, say, 100 dwellings might not be strategic allocations. • The text under the third key strand of the Spatial Strategy should include a reference to protecting village character. This amendment would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF. • Spatial Strategy Paragraph 4.3 is supported as it recognises the strong linkage of the Abingdon / Oxford Fringe sub area with Oxford. However this is not further recognised or exploited in the actual strategy. • As the Vale is concentrating employment opportunities in a few locations it would make more environmental and economic sense to concentrate housing in those areas more than is being done in this version. • Concentrate on areas where expansion would be beneficial including where developing infrastructure (transport hubs such as new</p>	<p>the district in full.</p> <ol style="list-style-type: none"> 1. Unmet need for Oxfordshire is clearly addressed by CP2. 2. Growth is clearly directed towards the larger and most sustainable settlements with around 75 % of development focused within Science Vale. This approach clearly protects the environment by minimising development in less sustainable rural locations. 3. The Council considers that the SHMA is up to date, fit for purpose, robust and consistent with national policy requirements. The Council is required to meet the Objectively Assessed Need in full and is planning to do so with a sustainable strategy for economic led growth. The SHMA has been informed by a comprehensive assessment of economic growth projections and the plan has been informed by an independent assessment of the market and housing deliverability. 4. An independent Green Belt Review has been undertaken, in accordance with the NPPF, and concluded that some sites no longer meet the purposes of the Green Belt. If the Planning Inspector agrees with this position, these sites should not be considered as being within the Green Belt and would therefore constitute greenfield land, no different to any other. 5. The NPPF allows development in the AONB providing certain criteria can be met. The Council has demonstrated that there are exceptional circumstances to justify the proposed development that would in any case not lead to significant harm to the AONB. 6. It is appropriate for the Local Plan, which sets a strategic policy framework for the district, to identify the most appropriate locations for strategic growth (NPPF Para 47).

Category	Summary	Council Response
	rail stations) would be welcomed and enhance existing and expanding communities. • The use of settlement limits to arbitrarily restrict suitable, sustainable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by NPPF. • The Local Plan Part 1 should seek to increase housing supply in the Plan's early years to ensure a continuous 5 year supply of housing land including a 20% buffer and meeting the previous year's shortfall in the first five years of the Plan. This should be achieved by including a new policy which allows permission to be granted for smaller sustainable, immediately available	7. The Council is planning for smaller and non-strategic sites, which will be set out in a separate DPD, and is compliant with national policy.
Spatial Strategy – Blewbury	Policies should state how the additional 220 dwellings should be distributed within the remaining South East Vale Sub-Area. This should include provision at the Larger Village of Blewbury	The Council makes provision to plan for small/ non-strategic sites either through a separate DPD or through a Neighbourhood Plan. This approach provides flexibility and is considered to be wholly consistent with national policy. If reasonable and realistic development sites are identified at Blewbury they will be considered as part of preparing a future DPD. Sites will be selected in accordance with a suitable methodology that will be defined more fully at the time.
Spatial Strategy – Botley and Kennington	The emphasis on SE Vale does not reflect the role Oxford plays in the County. Botley and Kennington should be allocated housing sites to balance growth in the South of the County. The Local Plan 2031 should recognise SE Vale villages and rural communities have had a disproportionate amount of development compared with other rural areas and villages that have had no significant growth in the period since the last local plan. This new policy should allocate a proportion of the 6600 houses unallocated at present in The Plan to each of the three Sub Areas.	The Plan makes clear provision for delivering the Objectively Assessed Need in full. Any requirement to contribute towards un-met need for Oxford City is clearly addressed by Core Policy 2. A strategic site is already identified at Kennington. Apart from a proposal for development in the centre of Botley and by supporting re-development opportunities at Harcourt Campus, there are no strategic residential proposals at Botley. Further sites at Botley may be assessed as part of future DPPD's or Neighbourhood Development Plans.
Spatial Strategy – Distribution	A more sustainable, spatial strategy would focus more strategic development close to Oxford. This would better reflect the evidence on commuting patterns and the economic strategy signed up to by all	The Spatial Strategy focuses growth on the largest and most sustainable settlements in the district and directs around 75 % of growth to Science Vale. It is therefore considered to be

Category	Summary	Council Response
	Oxfordshire authorities that confirms Oxford as one of three main growth areas in the County. Reasonable alternative has not been tested.	fully in accordance with the Strategic Economic Plan for Oxfordshire. This approach ensures that the majority of housing growth is directed to the area where the majority of business growth is projected to come forward, i.e. being particularly focused around the Enterprise Zone sites at Milton Park and Harwell Campus. The approach also supports the delivery of the Science Vale strategic infrastructure package, endorsed by the Highways Authority as being set out in the emerging LTP4. The plan makes clear provision for addressing un-met need for Oxford, should it need to come forward in the VoWH, within CP2.
Spatial Strategy – Future Provision	Parish councils are concerned about the placement of future housing under the Local Plan Part 2.	The Council is committed to working collaboratively with Parish Councils in the preparation of the Local Plan 2031 Part 2. Indeed, CP4 makes clear provision for Neighbourhood Plans to allocate sites, should communities wish to bring plans forward for their areas.
Spatial Strategy - Garden Cities	Take on board Government initiatives such as Garden Cities linked to existing and developing infrastructure	A proposal for a Garden City within the VoWH was put forward for consideration in the preparation of the Vale Local Plan 2031. This was assessed as part of the sites selection process and is reported within the Sites Selection Topic Paper.
Spatial Strategy – General Comment	The proposed strategic allocations, with one exception, are in sustainable locations, or ones that can be made sustainable, subject to appropriate developer interventions and contributions, including, where necessary, those required to initiate public transport improvements.	Noted.
Spatial Strategy – Marcham	Pleased that the site south of the A415 in Marcham, previously in the 2014 Housing Delivery Update, has been removed from the Plan as a site for housing	Noted.
Spatial Strategy - Oxford Garden City	Support for Oxford Garden City	Noted.

Category	Summary	Council Response
Spatial Strategy – site representation	Barwood have interests in land to the East of East Hanney – east of the A338 and south of Steventon Road. Barwood object to the Spatial Strategy which is considered unsound, and would encourage the District Council to review their decision not to allocate land to the east of East Hanney.	The Council have identified a proposed strategic site at East Hanney and not identifying the east of East Hanney site is not related to the Spatial Strategy. The justification for selecting individual sites is set out within the Sites Selection Topic Paper.
Spatial Strategy – smaller sites	Core Policy 4 fails to recognise the role development at smaller villages and at the lowest order settlements (below the four tiers of the settlement hierarchy) have played in maintaining the supply of housing in the Vale. Limited non-local needs development should be also allowed in smaller villages and villages of the lowest order to help making those villages and rural communities thriving. In terms of the presumption in favour of sustainable development, it is considered that the presumption applies to all settlements within defined parts of the hierarchy, save for those locations not listed. The Policy's approach to the presumption conflicts with the Framework which has no such limitations on development. There is an overreliance on the Local Plan Part 2 and neighbourhood plans to deliver.	<p>The Councils approach to identifying strategic locations for development, to meet the objectively assessed housing need in full and to achieve and maintain a Five Year Housing Land Supply are consistent with national policy. The approach to planning for small and non-strategic sites is clear as they will be allocated in a separate DPD.</p> <p>It is appropriate for the Local Plan, which sets a strategic policy framework for the district, to identify the most appropriate locations for strategic growth (NPPF Para 47).</p>
Spatial Strategy – smaller sites	Concern that the plan is overlooking small and medium scale deliverable housing land, such as at Stockham Farm, which is not of a scale to be a strategic allocation and is currently outside out of date settlement boundaries. These sites potentially represent an important supply of sustainable housing land. The University is in broad support of the Plan and keen to work with the Council to ensure that it is found sound. However, as suggested in previous representations, the University is concerned that the role of smaller scale proposals on suitable deliverable sites, such as that at Hazel Road, should be considered within Part 1 of the Plan in order to ensure the Council delivers growth in the short term.	The Councils approach to identifying strategic locations for development, to meet the objectively assessed housing need in full and to achieve and maintain a Five Year Housing Land Supply are consistent with national policy. The approach to planning for small and non-strategic sites is clear as they will be allocated in a separate DPD.
Spatial Strategy – Support	Kler Group agrees that providing the majority of the District's new homes within the South East Vale Sub-Area is the most appropriate strategy for the Local Plan. Science Vale is a key growth area within	Noted.

Category	Summary	Council Response
	<p>Oxfordshire Strategic Economic Plan (OSEP) and focus for significant investment. Given extensive existing employment opportunities within the South East Vale Sub-Area, plans for further growth, and the NPPF emphasis on minimising the need for travel, it is appropriate that the emerging Plan allocates 75% of strategic housing growth within South East Vale. The Spatial Strategy, Sub-Area Strategies and Settlement Hierarchy which focuses strategic housing growth at the three Market Towns (including Abingdon) is supported and considered to comply with the Government's drive for delivering sustainable development. Given the strong National Policy approach to minimising the need for travel and ensuring sustainable patterns of development, it is considered that the approach for allocating most of the District's strategic housing growth in the South East Vale Sub-Area where most of the District's existing and emerging employment opportunities are located, is consistent with national policy and is therefore both sound and legally compliant. Radley College have interest in land off Radley Road, Abingdon-on-Thames ('the Triangular Field') and through these representations review the proposed release of the site within the Green Belt Review and confirm the college's support for the Council's position in this respect. Comprehensive representations pertaining to land at Radley have been submitted under separate cover. The Spatial Strategy sets out how the Vision will be shaped. It is supported. The use of the sub-areas to set specific requirements and deliver the vision for the plan is supported Bloor supports the distribution of housing under Core Policy 4. However, it should accommodate development in neighbourhood plans should these allocate more housing than set out in the Local Plan and identify an allowance for windfall sites coming forward over the Plan period as additional to Neighbourhood Plan allocations. We support the distribution of growth as set out within the spatial strategy for the Vale of White Horse. The plan provides a robust justification for its approach, which responds and balances the unique characteristics of the district covering the economic opportunities</p>	

Category	Summary	Council Response
	presented by the Science Vale, Oxford, Swindon and Didcot and the environmental characteristics of the district, which are implicit in the overall distribution of housing.	
Spatial Strategy – Surrounding area	More attention needs to be given to connections with other key sites outside the Science Vale, and in particular to transport between those sites.	The proposals within Science Vale are fully compatible with the Strategic Economic Plan for Oxfordshire. The Science Vale Infrastructure Package is consistent with the Local Transport Plan, as prepared by the Highways Authority, which does itself consider wider linkages and opportunities across and beyond Oxfordshire.
Spatial Strategy – unmet Need	Oxford City Council state CP4 does not recognise Oxford's unmet need. Alternatives should have been tested. Also a comment that the housing target should take into account Oxford's unmet need and highlight the potential of Challow Park. East Challow, Wantage.	The Councils approach to un-met need is clearly set out within CP2.
Spatial Strategy – Villages	The SHMA figures apply to a city development not a village community and would be unsuitable. The emphasis on expanding existing settlements is useful, but hardly applies to villages. Closures of key services such as banks, post offices, pubs, village shops, reduced bus services, makes villages less sustainable. It is unrealistic to think that adding a few houses to a village will reverse this process	<p>The Council have prepared an ambitious, yet realistic strategy for growth, which is compliant with national policy and is consistent with wider strategies for Oxfordshire, including for example, the Strategic Economic Plan. The plan is based on up-to-date evidence that is fit-for-purpose and supports the delivery of the Objectively Assessed Need for the district in full.</p> <p>1. Unmet need for Oxfordshire is clearly addressed by CP2. 2. Growth is clearly directed towards the larger and most sustainable settlements with around 75 % of development focused within Science Vale. This approach clearly protects the environment by minimising development in less sustainable rural locations. 3. The Council considers that the SHMA is up to date, fit for purpose, robust and consistent with national policy requirements. The Council is required to meet the Objectively Assessed Need in full and is planning to do so with a sustainable strategy for economic led growth. The</p>

Category	Summary	Council Response
		<p>SHMA has been informed by a comprehensive assessment of economic growth projections and the plan has been informed by an independent assessment of the market and housing deliverability.</p> <p>4. An independent Green Belt Review has been undertaken, in accordance with the NPPF, and concluded that some sites no longer meet the purposes of the Green Belt. If the Planning Inspector agrees with this position, these sites should not be considered as being within the Green Belt and would therefore constitute greenfield land, no different to any other.</p> <p>5. The NPPF allows development in the AONB providing certain criteria can be met. The Council has demonstrated that there are exceptional circumstances to justify the proposed development that would in any case not lead to significant harm to the AONB.</p> <p>6. It is appropriate for the Local Plan, which sets a strategic policy framework for the district, to identify the most appropriate locations for strategic growth (NPPF Para 47).</p> <p>7. The Council is planning for smaller and non-strategic sites, which will be set out in a separate DPD, and is compliant with national policy.</p>
Spatial Strategy, Alternative sites	By dividing the District into three Sub Areas VWH has reduced the flexibility of adjusting housing provision to meet evolving needs over the next 15 or more years.	The Vale is planning for housing delivery for the whole district. The site selection process has considered all reasonable and realistic alternative sites across the whole district and the spatial strategy reflects the needs of the district as a whole. The sub-area approach, which is consistent to most adopted core strategies/ local plans (for example including Wiltshire, Swindon, Oxford etc.) helps to give more spatial expression to the strategy, demonstrating how locally distinctive matters are being planned for.

Category	Summary	Council Response
Windfall Allowance	<p>It is unsound to defer the matter of identifying land for 1,000 (or possibly 1,900) dwellings to the Part 2 Local Plan, Neighbourhood Development Plans, or Development Management process. We note that the Council has included a windfall allowance for the whole plan period. The NPPF only allows a windfall allowance as part of a council's five year housing land supply where justified by compelling evidence. We consider it dubious to assume 900 dwellings will be provided over the first five years of the life of the plan through windfall.</p>	<p>It is appropriate for the Local Plan, which sets a strategic policy framework for the district, to identify the most appropriate locations for strategic growth (NPPF Para 47).</p> <p>In relation to the Council's approach to windfalls; the PPG is clear that:</p> <p>"A windfall allowance may be justified in the five year supply if a local planning authority has compelling evidence as set out in paragraph 48 of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in para 48 of the National Planning Policy Framework)." Any allowance would need to have regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.</p> <p>The plan / trajectory doesn't suggest 900 homes would be provided in the first 5 yrs. of the plan:</p> <ul style="list-style-type: none"> - windfall of 545 homes were included for years 1-5 based on existing commitments - windfall allowance / broad location of 900 homes were included for years 6-15 based in current trends

Core Policy 5: Housing Supply Ring-Fence

Category	Summary	Council Response
Clarify basis for assessing housing supply	While the underlying aim of Policy CP5 is supported, it does not make clear whether assessments of housing land supply will be calculated individually for each respective area. This needs to be made clearer within the policy to ensure that it is justified.	Agree that proposed change improves clarity of policy intention and application
Economic Baseline Option	It is suggested that the plan is unsound because the forecast growth of homes and jobs is considered unrealistic and therefore contrary to Government policy that proposed allocations must have a realistic prospect of being implemented, as set out in paragraph 22 of the National Planning Policy Framework (NPPF). There is no reference in the Plan as to how the delivery of 9,000 homes proposed at Didcot within South Oxfordshire and the Vale will be achieved. The South Oxfordshire Core Strategy has a "ring fence" around Didcot. There is no consideration in this Plan for joint working with South Oxfordshire D.C. on monitoring the rate of development at Didcot within a "ring fence." The SODC 2014 Housing Supply Statement shows that in terms of a 5 year land supply 2014-19, there is a 2,500 dwelling shortfall in the delivery of dwellings at Didcot, based a past completions 2012-13 of 200 dwellings p.a. House completions in Didcot are now projected to be developed at 300 dwellings p.a. over 20 years.	The plan is accompanied by a housing trajectory that demonstrates how the proposed housing will be delivered through the plan period. The package of strategic sites have been selected, with housing delivery in mind, and the plan is supported by evidence that demonstrates the proposals overall are deliverable and consistent with national policy requirements
Effect of Ring Fence on Commuting	The proposed ring fence provides no certainty that current commuter patterns of the Vale acting as a dormitory area for commuting to Oxford, Reading, Swindon, Newbury, and London will not continue or be increased by the Plan's proposals. Low salaries in scientific research will make new market housing unaffordable to new jobs in scientific research.	The plan has been informed by detailed assessment of traffic impacts including working closely with the Highways Authority (OCC). The SHMA has been informed by detailed evaluation of existing and future commuting patterns. The housing target proposed and the policy to direct growth to Science Vale has therefore been informed by up to date and proportionate evidence.
Growth within the Ring-Fence Area	To be effective amend Core Policy 5 to make clear that the 'ring fence' is not a restriction on bringing forward additional suitable and deliverable sites within the 'ring-fence' area, as housing delivery here	The Ring Fence does not preclude the Council from allocating more sites within the Ring Fence area within the Local Plan Part 2 or through Neighbourhood Plans. Nor does it preclude infill that might come forward that is plan compliant. However, such housing would

Category	Summary	Council Response
	will support growth in, and the needs and demands of, the wider Housing Market Area.	not contribute towards the 5 YHLS of the wider district area and so would constitute over-allocation.
Housing Target-SHMA	To make Core Policies 4 and 5 sound they must have a housing needs basis that has been more critically examined than the SHMA, and has addressed the criticisms of the CPRE report. Numbers and sites from the 2013 draft Local Plan should replace those in this version. Even if higher numbers are confirmed as the most reliable forecast, there should still be a mechanism for adjusting plans should reality not match up to the forecast, or if infrastructure to support the housing cannot be delivered.	The Local Plan Part 1 is informed by an up to date and fit for purpose SHMA that has been prepared in accordance with appropriate methodology and is consistent with national policy. The Local Plan EIP provides an appropriate mechanism for the SHMA to be robustly scrutinised.
No Comment	The Freeholder has no comment to make in respect of policy CP5.	Noted.
Relationship between CP3 and CP5	Core Policy 5 is a positive new addition to the Local Plan and directs growth to the most sustainable locations for development. Clarification is needed as to how sits alongside the housing delivery and strategic allocations within Core Policy 4. For example, Harwell Campus which falls within the ring-fence is described as a Larger Village, within which Core Policy 3 only allows for unallocated development limited to providing for local needs and to support employment, services and facilities within local communities. Conversely, the ring fence policies encourages housing development to support jobs and infrastructure growth; it is unclear how the objectives of the two policies work together to deliver housing and other new development.	Disagree that "the ring fence policies encourages housing development to support jobs and infrastructure growth" in the RF area per se, over and above allocated sites. It is more specifically to provide some contingency from a possible future failure of allocated sites contained within the Ring Fence area. If the 5YHLS was lost there would be a reversion to NPPF presumption test within the Ring Fence area only.
Remove Sutton Courtenay from the Science Vale action area	An explanation should be provided as to why Sutton Courtenay village is included in the Science Vale action area and cannot be excluded. Sutton Courtenay as a village should be removed from the Science Vale action area.	Sutton Courtenay is located in close proximity to Didcot and the employment land within the VOWH district that adjoins Didcot to the West. The village clearly has a strong functional relationship with both of these areas and as such forms part of the Science Vale Area. Sutton Courtenay is therefore located within both the South East Vale Sub-Area and the Science Vale Area (CP's 4 and 5).
Remove the North Wessex Downs AONB	The ring fence area comprises Harwell Campus and Chilton Field and extends into greenfield land beyond: both reside within the North	CP5 Applies to the VOWH part of Science Vale only; it does not apply to any part of SODC.

Category	Summary	Council Response
from the Science Vale Ring-Fence	Wessex Downs AONB. The ring fence does not comply with the NPPF 115 and 116, the CROW Act 2000 Section 85, Core Policy 44: Landscape and the plan is therefore unsound. Remove the North Wessex Downs AONB from the Science Vale “Ring-fence” to protect it from future speculative development should the Science Vale fall behind in delivery of its housing targets. Housing provision across the Vale of White Horse and South Oxfordshire to support the Science Vale has not been made clear as housing provision straddling boundaries is often not provided in documented evidence.	The only parts of AONB included within the area covered by CP5 are the existing Harwell Campus site, the existing development at Chilton Field and proposed development areas set out elsewhere within the Local Plan Part 1. There are no other parts of the AONB included within the CP5 area.
Remove Wantage and Grove from the Ring-Fence	Including Wantage and Grove in the Housing Supply Ring-Fence is unsound as the transport and road infrastructure between. Wantage and Grove and areas of employment are unfit for purpose.	Wantage and Grove form an integral part of the Science Vale area that was first identified as an area for growth within the South East Plan, and the adopted South Oxfordshire Core Strategy.
Ring-Fence and delivery	The Ring-fence and implications of failed supply are unclear. In the absence of high-level sub regional justification the housing supply ring fence is contrary to the NPPF requirement that local plans should meet the full objectively assessed need for in the housing market area. There is no evidence that the proposed ring fenced part of the district constitutes a distinct or identifiable housing market area. In this context suitable potential alternative smaller strategic allocations should be identified which are demonstrably deliverable early in the plan period. GDL has concerns whether allocations can realistically be delivered within the timescales envisaged. If these concerns are borne out, the ring fence policy would not enable the Council to have flexibility to achieve a higher rate of housing development elsewhere in the District to compensate. To achieve objectives for housing supply and provide for contingency in the event that large sites in the Science Vale do not come forward, it will be essential to direct further growth to sustainable locations elsewhere in the District. The Council needs to justify the policy better and clarify how it will operate alongside maintaining supply in the rest of the district and what contingency measures might be brought into play if this mechanism fails. We would like a clause stating that if sites within	The consequences of 5YHLS delivery failure within the RF would be a presumption in favour of alternative sites in the RF area only, not the whole district.

Category	Summary	Council Response
	the ring fenced area become undeliverable, sites, especially brownfield sites outside the ring fence would be considered for development. Reliance upon an artificial 'ring fence' related to housing delivery through major allocations, a mechanism considered necessary because their deliverability is in doubt. Modifications are sought to the Allocations under Core Policy 4 to delete sites within the green belt and AONB and to substitute sustainable non AONB and Green Belt sites, including this site at Southmoor.	
Ring-Fence and the five-year housing supply	This approach is concerning, if/when the 'ring-fence' area for Science Vale fails to deliver/perform to the required housing trajectories. This would mean the OAHN for the District is not delivered with no mechanism for delivering this housing by alternative means, particularly if the policy approach in the Local Plan is that apportionments are non-transferable between the 'ring-fence' area and the rest of the District. According to our interpretation, CP 5 will have its own separate five-year housing land supply calculation. The policy does not say whether or not apportionments are non-transferable between the 'ring-fence' area for Science Vale and the rest of the District. The consequences of apportionments being non-transferable is that the 'ring-fence' area has the potential to become an 'abyss', where the Council can shift its housing need. Any non-delivery there is then sealed, in the sense that the Council can disregard it when applying Paragraph 47 of the NPPF. The Council's approach is contrary to National policy. The Vale's housing need should be calculated as one five-year housing land supply, not artificially divided up.	The consequences of 5YHLS delivery failure within the RF would be a presumption in favour of alternative sites in the RF area only, not the whole district.
Ring-Fence is too tightly drawn	The proposed housing land supply ring fence will threaten the overall delivery of housing and economic growth. The ring fence should be drawn more widely to include the whole South East Vale Sub Area, including East Challow. The delivery of houses in the plan relies upon allocating sites in AONB and Green Belt. This is unjustified when more sustainable alternatives are available. An alternative is the Golf	The consequences of 5YHLS delivery failure within the RF would be a presumption in favour of alternative sites in the RF area only, not the whole district. East Challow is peripheral to the Science Vale area and, it is not a logical or sustainable location to accommodate large scale spill over were the Ring Fence 5YHLS to fail in the future.

Category	Summary	Council Response
	Course site adjacent to the 500 unit allocation at Shrivenham which could be secured through a modification. Rather than protecting against the possible failure of major allocations more deliverable alternatives should be identified. The deliverable site of Shrivenham Golf Course is an obvious solution to ensure delivery.	
Ring-Fence is unjustified	The purpose of the Ring Fence is unclear. Science Vale Oxford as depicted in Figure 4.3 is the same as the area of South East Vale depicted in Figure 5.4 apart from the extreme south east corner around Blewbury – in which there are no strategic housing proposals. Core Policy 5 should be deleted as the ring fencing of housing numbers is not justified. The Travel to Work Area associated with Vale of White Horse District includes a variety of settlements within and outside the District Council boundaries. Linden understand there are elements of the proposed plan other parties will argue are unsound, such as the plan is ineffective because it does not seek to address Oxfordshire's unmet housing need; proposed housing allocations within Green Belt and AONB are unjustified because there are more sustainable alternatives; and ring fencing (Core Policy 5) is inconsistent with National Planning Policy. Allocations in protected landscapes of the AONB, in greenbelt locations and those detached from established existing communities are unsustainable.	The consequences of 5YHLS delivery failure within the RF would be a presumption in favour of alternative sites in the RF area only, not the whole district.
Ring-Fence will cause coalescence	The proposed Ring-Fence would lead to the coalescence of villages with Didcot affecting their identity and the setting of heritage and archaeological remains. The ring fenced area needs to be redrawn to exclude land adjacent to the village and there should be a policy preventing Didcot from merging with surrounding villages.	The Ring Fence area as drawn does exclude the area around villages, including for example Harwell, and therefore does protect the rural/ openness of the area, including between Didcot and Harwell. The area within the Ring Fence to the east of Didcot is proposed for strategic growth within CP4.
South Oxon Ring-Fence	There is no reference in the Plan as to how the delivery of 9,000 homes proposed at Didcot within South Oxfordshire and the Vale will be achieved. South Oxfordshire Core Strategy has a "ring fence" around Didcot. There is no consideration in this Plan for joint working with South Oxfordshire D.C. on monitoring the rate of development at Didcot within a "ring fence."	It is made clear within the plan that a joint Area Action Plan will be prepared for the Science Vale area across both VOWH and SODC to ensure this area is planned for holistically. However, CP5 applies only to the VOWH area and the housing target for the district as required by national policy.

Category	Summary	Council Response
Support CP5	<p>Stagecoach recognises that a large overall annualised quantum risks creating a situation where, short term there may be perverse outcomes should large-scale allocations be delayed. This can lead to applications as departures from the Local Plan in less sustainable locations, including many which do not benefit from high-quality public transport, nor would such service be achievable. For these reasons, Stagecoach supports this Policy. LIH supports CP5. Ring-fencing housing supply in the Science Vale area will enable the Council and development industry to work together to ensure that provision of employment and housing is integrated and necessary infrastructure is provided. We support the recognition that the ring fence area is the most sustainable area for new residential development. SODC is pleased to see a ring fence proposed for housing in Science Vale and strongly supports this proposal. Persimmon Homes and Taylor Wimpey UK Ltd support the principle established by Core Policy 5 in respect of a 'ring fence' to housing supply in the Science Vale area.</p>	Support noted.

Core Policy 6: Meeting Business and Employment Needs

Category	Summary	Council Response
CP6 - Support	There were three comments of support for Core Policy 6. One of these was a more general comment of support for the strategic employment site allocations across the district, while two were more directly supportive of an employment designation on land south of Park Road, Faringdon with one of these comments supporting also the retention of employment land in faringdon and the other stating the use of land for employment should remain on the Faringdon side of the A420 and should not be permitted to cross over the A420 into open countryside	Support welcomed and is noted
Employment Figure too High; CE Report	Around 62 comments objected to the revised projected employment figure of approximately 23,000 jobs, derived from the Cambridge Econometrics Report, and which subsequently informed the Strategic Housing Market Assessment for Oxfordshire. These comments related to the following; questioned the accuracy of the figure, the lack of a challenge to the evidence by the Council, requested a much lower employment figure for the district as it reflects aspirational employment growth of the Local Enterprise Partnership (LEP) which should not be taken into account. As the Plan is based on unsound figures and if they are not realised, it is irresponsible and premature to allocate unprecedented large strategic sites in the North Wessex Downs AONB. Also other comments related to; no justification of 129 hectares on an Area of Outstanding Natural Beauty for business development needs, The net 5,400 number for the Harwell Oxford Campus actually represents a job capacity for the site, not the projected number of new jobs and to date the Harwell-Oxford campus has never provided speculative space. Therefore, the statement of “at least 5,400 jobs” being created at the Harwell Oxford Campus is unsound and Clarification is sought on the past take-up of employment land, seek evidence of monitoring to demonstrate what level of jobs increase is being achieved. Economy Topic Paper page 37 describes three options. But these options do not appear to have been compared to past take up rates for employment land. The economic	The jobs figures for the district is based on a robust evidence base including work to inform the Strategic Housing Market Assessment (see ECON02 Economic Forecasting to inform the Oxfordshire LEP and SHMA). The figure of 23,000 is a total employment figure and includes indirect jobs and jobs not requiring designated employment land. An addendum to the Employment Land Review Update (see submission document ECON01.2) identifies that there is sufficient strategic employment land capable of accommodating economic growth up to 2031.

Category	Summary	Council Response
	forecasts to inform the SHMAA estimated that two thirds of the growth would be in the Finance and Business sector. As Harwell Campus is promoted as a Science Park, it is not an established Finance and Business centre. It is therefore unrealistic for the proposed jobs in Policy 6 to be delivered in the Plan Period.	
English Heritage - Retail text (p.44)	English Heritage welcomes the recognition of the historically constrained nature of the Vale's market towns in paragraph 4.33, but the historic character should also be seen as a benefit in attracting shoppers.	Support noted. Whilst the Council do not feel any amendment is necessary, the Council does recognise the importance of its attractive and historic market towns in increasing tourist and visitor numbers.
General	There were around seven more general comments made to Core Policy 6 which did not specifically object or support the policy. These included; a number of questions and general comments with respect to the policy and locations such as Abingdon and Didcot, is not clear from the wording of the policy what is meant or specifically captured by the term "employment" for the purposes of the LP 2031, if the predicted increase of employment does not materialise and the scale of new houses falls below the level qualifying for infrastructure how would the shortfall in infrastructure be dealt with and questions how the job amounts translate into new homes. Also should we not be embracing these hi-tech inventions, and not everyone works where they live in particular with the growth of working from home.	General comments to the Local Plan 2031 Part 1 with no particular objection to the local plan. No changes considered necessary.
Glossary	It is not clear from the wording of the policy what is meant or specifically captured by the term "employment" for the purposes of the LP 2031. It is also not defined in the LP 2031 Glossary. It is considered necessary for the Plan to define the term to provide certainty for developers and investors.	Suggested modification was accepted by the council. Change is set out in submission document DLP11 Schedule of Proposed Minor Changes (No. 4.9)
Milton Interchange; Trunk Road Service Area	Land at Milton Interchange south of the A4130 currently allocated as a site for Trunk Road Services. Central Government proposes significant funding for the Botley and Peartree Interchanges. This along with the proposed new "garden city" at Bicester will increase the need to expand roadside services. The location should be considered as a	The land in question is part of Local Plan 2011 saved policy TR10 (Lorries and Roadside Services), which will be reviewed as part of Local Plan 2031 Part 2. Land at Milton Interchange, along with two other designated sites in the district, are considered strategically important for the provision of roadside services on the A34 and A420.

Category	Summary	Council Response
	mixed use site in relation to its position within Science Vale UK and nearness to Didcot A (site of the former power station).	
Objection; DtoC	One objection was made by Oxford City Council stating that the core policy and supporting text does place any great emphasis on the importance of the “knowledge spine” of which Bicester, Oxford and Science Vale all form part of.	Reference is made to development in neighbouring districts, the importance of Science Vale (the key feature of the wider Strategic Economic Plan within the Vale) and the wider role of the Strategic Economic Plan itself.
Objection; Harwell Campus	Two comments were received by Harwell Oxford Campus Partnership who are seeking to allocate residential development as an alternative to the strategic development site to the east of the campus. Their proposal includes residential development on land designated with Enterprise Zone status. They seek a reduction in the total amount of employment land identified in Core Policy 6.	The total amount of Employment Land designated at Harwell Campus includes all of the Enterprise Zone land which will be the focus for new employment development in the coming years. Outside of the enterprise zone land, a further 35 ha of land is identified for development up to 2031. This is in line with the predicted economic growth for the district as set out in ECON02 Economic Forecasting to inform the Oxfordshire LEP and SHMA which stated that there is enough vacant/developable land to accommodate this growth. This was further supported by the Addendum to the Employment Land Review Update (ECON01.2).
Objection; Monitoring	There were four comments from a total of around 90 which seek a revision to the monitoring framework of the local plan so that there are more regular checks (every 2 years) to ensure that any downturn in employment rates would trigger a review of the local plan.	Chapter 7 and Core Policy 47 set out the annual monitoring of the local plan through the monitoring framework as set out in Appendix G. This includes key monitoring targets for Core Policy 6 and other policies in relation to strategic employment land.
Objection; Site/Location Specific	There were around 13 comments which objected to Core Policy 6 on site/location specific matters• Three comments for Abingdon-on-Thames o there is not enough vacant/developable land in Abingdon-on-Thames to accommodate growth and balance housing growth. o allocate the town centre as a strategic employment site and defer the use of Green Belt land North of Abingdon for housing development until employment and housing needs are clearer. • Three comments for Cumnor objecting to any further employment development at Cumnor Hill due to infrastructural constraints ad sites should be removed from the greenbelt and concentrate on brownfield land. •	Local Plan policy CP6 allocates or safeguards sufficient and appropriate land to meet identified business needs within which the specified business uses are appropriate. Policy CP28 provides flexibility to bring forward additional land if needed locally subject to criteria, and there is also scope to do if justified in Local Plan Part 2 and Neighbourhood Plans. Abingdon-on-Thames: Abingdon has a designated "town centre policy area" including areas of primary and secondary frontages. Such acceptable town centre uses include B1 employment use. Cumnor Hill: Cumnor Hill is a saved Local Plan 2011 employment

Category	Summary	Council Response
	<p>Two comments for Sutton Courtenay o Seeking a policy to discourage warehousing, arising as a result of recent developments in the vicinity of the village o Plan fails to encourage local investment in high tech jobs• One comment for Milton Interchange (designated A34 Service Area) seeking its re-allocation as a mixed use site • One comment for the strategic site allocation at Monks Farm, Grove, seeking a more flexible approach to the delivery of employment land on this site. Concerns raised over how it can compete with other strategic employment sites at Harwell Campus and Milton Park• Three comments for Faringdon and more widely the Western Vale sub area, generally stating that there are no realistic job opportunities here when compared to the envisaged housing growth, Para 4.29 states employment land will be also be provided as part of mixed-use strategic sites at Land South of Park Rd, Faringdon however these are existing sites, and the Plan makes no realistic attempt to provide for employment growth in the immediate Western Vale area to counter the inevitable out-commuting that will result.</p>	<p>allocation that is supported by the Employment Land Review (and subsequent updates)</p> <p>Sutton Courtenay: The employment growth predicted for the plan period includes significant investment in high tech jobs for Science Vale. To include a policy restricting warehouse development in the vicinity of the settlement is not considered appropriate as it would be contrary to the NPPF, which encourages sufficient flexibility and where local plans should not be overly restrictive in planning for economic growth.</p> <p>Monks Farm: The strategic site allocation of Monks Farm allocates some land for employment use (6ha) CP29 is sufficiently flexible and in line with the NPPF to accommodate additional economic growth if appropriate and justified.</p> <p>Faringdon/Western Vale sub area: The Local Plan allocates additional employment land in Faringdon. Furthermore, the Faringdon Neighbourhood Plan allocates additional employment sites at the town. The council is also supportive of expanding on existing allocations elsewhere in the western vale sub area, either through the progression of current and future neighbourhood plans and/or a review of such sites through Local Plan 2031 Part 2.</p>
Retail text (p.44)	<p>Four additional comments were also received with respect to the supporting retail text on page 44 of the Local Plan. • One request was for the inclusion of a reference to the existing local shopping centre at Grovelands (Grove) in paragraph 4.37. • A comment from English Heritage welcoming the recognition of the historic nature of the market towns in paragraph 4.33, but note that while it may limit the ability of these towns centres to grow, it can also be seen as a benefit in attracting customers. • A comment seeking clarification with respect to retail provision in Faringdon as well as for the whole district. A comment seeking to retail specialist shops and businesses within centres other than big stores.</p>	<p>Grovelands reference: Not all local shopping parades across the district are quoted in the supporting text. Millbrook Square is the natural centre to the local service centre of Grove.</p> <p>Faringdon: The reference in the Topic Paper relates to the specific retail need of Faringdon. There is a town centre site identified in Abingdon as there is a much greater need for Abingdon in the short term.</p> <p>Specialist/Local shops in Didcot: The provision and retention of local/specialist shops in Didcot is outside of the remit of our council. We work closely with South Oxfordshire and , ensure that any retail development on land to the west of Didcot (in the Vale of White Horse</p>

Category	Summary	Council Response
		district) will not undermine the vitality of the existing town centre of Didcot

Core Policy 7: Providing Supporting Infrastructure and Services

Category	Summary	Council Response
A34	<p>A number of comments are made about the A34, including by members of the “Save Chilton AONB Action Group” to express their concern with regard to the impacts (air, noise and light pollution) the increased traffic on the A34 and other roads in the vicinity like the A417 (as a result of the housing development) will have on to the North Wessex Downs AONB:- the essential highway infrastructure does not address the capacity issues surrounding the A34- the A34 is a barrier to growth for the Science Vale.- it is very likely that the new residents in the new housing areas at Harwell Oxford Campus will access employment opportunities further afield. This will lead to an increased traffic on the A34 which is already known to be congested and operating over its designed capacity in peak periods. The increased traffic on the A34 poses further threats to the tranquillity and character of the AONB.- thus it is argued that it would appear premature to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until a) there is a proven track record of economic growth in the area b) issues surrounding capacity on the A34 have been addressed and c) it has been proven that housing must be located in this area with a full analysis as required by the NPPF paragraphs 115 and 116. - the allocation of the 1400 houses within the AONB is with regard to their argumentation deemed to be unsustainable and are demanded to be removed from the Plan or reallocated.- implementing these steps in full will make the Local Plan compliant with the NPPF paragraphs 115, 116 and the CROW Act 2000. The Highways Agency (HA) is concerned if any material increase in traffic were to occur on the A34 (which forms the Strategic Road Network (SRN) in the Vale) as a result of planned growth at in the VoWH without careful consideration of mitigation measures. They emphasise that the Local Plan has to ensure that development cannot progress without the appropriate infrastructure in place. Any impact on the SRN, caused by development, needs to be identified and mitigated as far as reasonably possible. The HA in general, will support a local authority proposal that considers sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be</p>	<p>The Local Plan is informed by comprehensive assessment of transport impacts, close cooperation with the Highways Authority (OCC), and is proposing a significant package of highway and other infrastructure to mitigate any impacts and improve the provision of services and facilities generally. The Highways Authority is working with the Highways Agency to develop a Route Based Strategy for the A34 and the plan proposes a new crossing of the River Thames (north of Didcot at Culham) which has been shown will significantly reduce traffic flows on the A34 in the interim, before longer term solutions are identified and implemented. The Council is satisfied that the proposed allocation at Harwell Campus is justified and appropriate.</p>

Category	Summary	Council Response
	considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A34. It is recognised in the Local Plan that to ensure that planned proposals are viable, improvements to the A34 will be required.	
A420	<p>A number of comments are made about the A420, including those from the Western Vale Villages Consortium of Parish Councils. Comments include:</p> <ul style="list-style-type: none"> • the likelihood for employment growth in the Western Vale area is considerably low with more prime opportunities emerging only a few miles away in Swindon and to the east with the Science Vale growth initiative and even lower when the main arterial route serving Faringdon and Shrivenham, the A420, is so notoriously congested. Furthermore the employment land at Faringdon which has been available for over 10 years has not attracted any interest from either developers or occupiers despite various initiatives from Government and Local Bodies to stimulate development • the Plan states that land has been safeguarded at the Faringdon and Shrivenham junctions for upgrading, but improvements to junctions to allow more traffic onto an already congested road is no solution • the A420 is already at capacity at peak times of the day with queuing from Bourton to Swindon being a regular occurrence. The only upgrading that will reduce congestion is a full duelling of the A420 between Swindon and Kingston Bagpuize, but this cannot be funded solely by development • furthermore other existing infrastructure facilities like schools, doctor's surgeries, the sewage system, etc. won't be able to cope with this enormous strain • the Plan is considered to be unsound because 1650 houses are being planned in the rural Western Vale although it is blatantly obvious that the residents of these houses will need to travel to employment elsewhere (Harwell, Milton and Oxford). It is argued that the NPPF Paragraph 158 requires that "strategies for housing and employment in local plans should be integrated" and that the need to "travel to work" should "be minimised" (NPPF 4.34). Furthermore it is demanded that, to make the Plan sustainable, essential improvements to the A420 have to be a precondition to any housing development in the Western Vale • the Western Vale Villages Consortium considers the VWHDC draft local plan as unsound, unless and until a sound infrastructure plan to 	<p>The Local Plan is informed by comprehensive assessment of transport impacts, close cooperation with the Highways Authority (OCC), and is proposing a significant package of highway and other infrastructure to mitigate any impacts and improve the provision of services and facilities generally. Improvements are proposed to the A420 at Faringdon and Shrivenham and the Highways Authority are working to develop a Route Based Strategy for the A420. Infrastructure improvements are set out in the Infrastructure Delivery Plan.</p>

Category	Summary	Council Response
	<p>manage the well-known difficulties of the A420, and other major routes in the area, has been settled between the relevant parties • the Council's proposals tend to front load the building of houses prior to providing the necessary infrastructure, but improvements in infrastructure must be front loaded before increased housing • the contributions from developer via the CIL are unlikely to cover the level of the infrastructure required. Instead to a sticking plaster at a few hotspots a considered investment in infrastructure in the Vale is needed • a strategic environmental assessment of traffic arising from the proposed new housing on roads in the Plan area (A420) has to identify the needs for highway improvements and assess the impacts on the environment. This should drive the infrastructure needs, not what developers can afford under the CIL</p>	
Abingdon	<p>A number of comments are made with regard to Infrastructure Delivery in Abingdon. These include: • the funding of necessary improvements to local roads (Dunmore Road and Twelve Acre Drive) and highways (A34 interchange at Lodge Hill) is limited • the CIL and other sources of funding are likely to be exceeded • it is not guaranteed that the LEP funding will be forthcoming • the County Council will not have the money for this due to continuing cuts to local government funding • but a crossing on Lodge Hill is essential as it is difficult to cross • the Dunmore Road and Twelve Acre Drive will not be able to sustain the extra traffic that the 800 homes in North Abingdon will provide, this will only lead to more commuter chaos and does not take into account the issue of the Air Pollution in the area which already exceed the recommended safe levels • the roads in the North and North West Abingdon Area i.e. Dunmore Road and Twelve Acre Drive already suffer from gridlock during peak periods and are unable to cope with the increase in the number of vehicles caused by the development (not to mention the air pollution) • without new medical/ dental facilities, shops and a pharmacy integrated in the proposed development the existing infrastructure will not be able to cope with the increase in demand • Abingdon Town Council request assurance through legal agreements that excellent infrastructure is provided for any new developments • Abingdon Town Council requests at least one additional primary school within one of</p>	<p>The Local Plan is informed by comprehensive assessment of transport impacts, close cooperation with the Highways Authority (OCC), and is proposing a significant package of highway and other infrastructure to mitigate any impacts and improve the provision of services and facilities generally. Proposals to upgrade the A34 junction at Lodge Hill are set out in the plan, for which the proposed strategic development will make a significant funding contribution. Since the publication of the local plan, the upgrading has also been identified as a strategic priority for Oxfordshire County Council, who are also proposing a new Park and Ride facility at Lodge Hill within the Local Transport Plan 4 and Oxford Transport Strategy. The upgrading of the A34 junction will have a beneficial impact overall on helping to reduce traffic flows in Abingdon town centre/ the park and ride facility will improve public transport connections to Oxford, providing further reductions in local traffic. Infrastructure improvements are set out in the Infrastructure Delivery Plan.</p>

Category	Summary	Council Response
	<p>the new developments in North Abingdon in order to accommodate the additional children who would need to attend such schools. In terms of secondary school provision the Town Council requests funds to ameliorate the impact of the housing sites• Abingdon Town Council expresses concern over the need for additional cemetery space and asks the District Council to help in this regard. A possible location could be somewhere in the Green Belt, but apart from this the Town Council would like to see and urge that provision for a cemetery is made within the north-west Abingdon development, based on the triangle of land to the west of the Wootton Road.</p>	
Appleford	<p>Appleford Parish Council demands that plans for additional housing in the area also include the need for improvements to the local infrastructure (schools, GPs, dentists, public transport, etc.).</p>	<p>There are no plans for strategic development at Appleford. There are significant proposals for infrastructure delivery as set out within the Infrastructure Delivery Plan.</p>
CIL	<p>A number of comments were received, including general objections to CIL as proposed, relating to the councils approach to CIL. These include: • St Helen Without Parish Council objects to the introduction of CIL, because it discriminates small villages/communities/Parishes which do not have a Neighbourhood Plan. Those without a Neighbourhood Plan will receive only 15% of CIL receipts versus 25% for those with a Neighbourhood Plan. We demand the same rights for all Parishes/Villages. • A number of respondents recognise the need for S106 contributions and CIL charges, provided that they meet the tests in national guidance and CIL regulations. But they express concerns to the CIL Charging Schedule relating to whether the infrastructure costs have been robustly tested. • Furthermore they consider the CIL approach set out by the Plan as unsound. They argue the CIL Charging Schedule needs to be established by setting a charging schedule, which has been subject of public consultation and an examination. • Based on their experience they raise concerns that the total infrastructure costs could be underestimated. • Welbeck Strategic Land LLP general support the principle of a viability led approach and the prioritisation of essential infrastructure over place shaping infrastructure. But they are concerned by the suggestion that there will be a Supplementary Planning Document (SPD) for Section 106 and Section 278 legal agreements. • They argue that the</p>	<p>Noted. The Council is satisfied that its approach to CIL is consistent with national policy. The breakdown of CIL between parishes that do or do not have, adopted neighbourhood plans is determined by national Government.</p>

Category	Summary	Council Response
	National Planning Practice Guidance requires that policies for seeking obligations have to be set out in a development plan document and not in a SPD to enable fair and open testing of the policy at examination. (Paragraph: 003 Reference ID: 23b-003-20140306)• They have also considered the content of the Local Plan Viability Study, the Infrastructure Delivery Plan and the CIL Viability Study which form part of the evidence base of the emerging Local Plan, and raise questions concerning some of the assumptions which underpin the costing and analysis contained in these documents.	
CP7 - General Comment (1)	• The Free school is not mentioned within the LP. • The cycle network should be combined with the school for safe and sustainable transport.	Points noted.
CP7 - Thames Water	• Cooperation is needed with Thames Water at an early stage to ensure all water provisions are in place before any development can commence.	The Council agrees with Thames Water on this point and will continue to work with them on such matters.
East Hanney	Object development of East Hanney - Removal of the development of East Hanney from the Plan on the basis that it is 'unsound' with particular reference to: Core Policy 7Questions the ability of the Vale District Council to provide for additional infrastructure to support an increase of East Hanney by 60%.The provision of the infrastructure (extra capacity of sewage treatment, school places, electricity, gas and water supplies, etc.) will damage the existing community in addition to the damage caused by the new dwellings. Also the roads are already inadequate for the extra road traffic that will be generated.	The plan is accompanied by an Infrastructure Delivery Plan that makes provision for appropriate infrastructure provision in relation to all sites allocated in the Local Plan.
General Infrastructure	Around 80 comments express general concerns with regard to planned infrastructure provision. These include:• The existing infrastructure in the Vale (roads, schools, utilities, community facilities, health services/hospitals, sewage, public transport, etc.) is in general deemed to be already insufficient, at capacity and is not able to support the huge increase in the number of houses in the plan. It is demanded that the infrastructure must be improved and provided before the first house is occupied, but it is put in question whether the district is able to improve and provide the infrastructure on time as required or to finance it properly and in the long-run• There is concern about the impact the developments will have on the social & physical environment and the countryside• The Plan is in general considered to be ineffective, not positively prepared, unsustainable and	The Council has consulted extensively with infrastructure providers, including working in close partnership with Oxfordshire County Council, and developed a comprehensive Infrastructure Delivery Plan to ensure the proposed development is delivered alongside significant improvements in services and facilities. These improvements, for example, include a significant package of highway improvements. The plan has been informed by detailed evidence and testing, including the testing of development viability based on the detailed understanding of infrastructure requirements. The infrastructure requirements for each site are set out within the Development Site Templates within Appendix A of the plan. The

Category	Summary	Council Response
	<p>unsound as it currently stands in relation to infrastructure delivery • There is support for the Council's inclusion of viability testing, as this could lead to development being undeliverable, should this flexibility not be provided• An objection was received by Oxford City Council as the dispersed nature of the development proposed makes it more difficult to deliver new infrastructure. • Live [current/speculative] applications should be considered as part of the infrastructure provision in the district The Highways Agency state that to be sound, the Plan has to show proof, and make sure, that any infrastructure required to support the proposed growth is deliverable in general and in terms of cost and funding, etc. This process includes the full assessment of any constraint to infrastructure delivery such as additional land take, affordability, suitability and viability. The HA requests detailed evidence to be able to assess the potential impacts to the safe and efficient operation of the A34. They recommend that these discussions take place between the HA, OCC, and VoWH asap to fully assess deliverability.</p>	<p>Council is satisfied the proposals, taken in the round, will deliver sustainable development.</p>
General Infrastructure / County Council	<p>Schools: The County will provide deliverable solutions for sites where new or extended schools are needed. Some sites might be unviable due to the small scale of housing proposed in the Plan (Radley, John Blandy, St. James in East Hanney, St. Blaise and Stanford in the Vale) and some school expansions are predicated on the need for 3rd party land which has yet to be acquired (Radley, Sutton Courtenay, John Blandy, St. James in East Hanney, St. Blaise, Shrivenham and Stanford in the Vale). Therefore the delivery of these developments is contingent on a solution being found that is deliverable within the required timeframe. Transport: The delivery of transport infrastructure relies significantly on third party funding. Some funding is already secured, but it is assumed the remainder will come from the Local Growth Fund (LGF) and contributions from developments within SODC. The required supporting infrastructure has to be funded and delivered in time to support the growth planned otherwise the Plan is at risk. It is uncertain that the current approach will be sufficient to convince the Inspector that the significant risk can be mitigated. IDP: The IDP seems to capture the main infrastructure items but not necessarily the full cost of items. It is important that regular updates are made to reflect the changing nature of</p>	<p>Noted.</p>

Category	Summary	Council Response
	infrastructure packages needed to support growth. This is especially important when considering the timing of development and speculative planning applications.	
General Infrastructure / Developer Comments	Developer accepts that contributions will be required	Noted.
General Transport	<p>A number of responses make general comments about the need for and delivery of transport related infrastructure. These include:</p> <ul style="list-style-type: none"> • A34 operates at or above operational capacity in both directions, in the morning and evening peak. The A34 needs to be upgraded – requiring a diamond junction at Lodge Hill (N.Abington), as well as additional lanes between M40 and Chilton, and possibly a southern/eastern bypass and river crossing. This needs to be completed before any housing development. • A417 operates at or above operational capacity between Wantage and Featherbed Lane in the morning peak and in the other direction in the evening peak. It also functions as a village street through Harwell Village and should therefore include traffic calming measures • A420 operates at or above operational capacity in both directions near Buckland and in short sections near Cumnor and Fyfield in the morning and evening peaks. • A415 operates at or above operational capacity between Kingston Bagpuize and Frilford, with particular problems at the Frilford junctions with the A338 and between Marcham and the A34. • A4130 operates at capacity approaching Milton Interchange. • Public transport operates at capacity and improvements in this respect are aspirational, or, if planned are years away. Therefore the growth as envisaged by the Plan is unsustainable. • It is expected that the Kidlington – Oxford – Abington – Didcot – Chilton areas is sooner or later becoming a conurbation. As such the entire plan with its envisaged growth and associated impact onto the environment (climate change) is not sustainable and unsound. • The way the authorities are working together is considered neither to be effective nor efficient to achieve improvements to the transport infrastructure. To be sound the growth in housing should be reviewed. • Many local roads are narrow and cannot be widened. Healthcare 	<p>The Council has worked closely with the Highways Authority to develop robust evidence to ensure it is based on a detailed understanding of highway impacts associated with the plan proposals. The plan is accompanied by a detailed Infrastructure Delivery Plan and sets out a significant package of highway infrastructure to increase network capacity and mitigate any impacts. The Highways Authority are developing a new Local Transport Plan that will add further detail to the proposals set out in the local plan, including for example, and developing detailed Route Based Strategies for specific routes. These will add more local improvements to routes such as the A420, A417, and A4130 etc. The above improvements are also accompanied by planned improvements to public transport and the strategic cycle network.</p>

Category	Summary	Council Response
	<p>and emergency services struggle to cope with the current traffic situation. Infrastructure improvements need to be completed before any housing development. • With the national deficit in mind it will not be and cannot be expected that any improvements will be found in time to make a difference in the first decade of this plan. • The local transport infrastructure is inadequate to deal with the current demands placed upon it, and would be able cope with the anticipated expansion of population. • Public transport and cycling links are also inadequate in terms of providing an alternative, and there are no plans in the Infrastructure Delivery Plan that will make a difference. • The major settlements have no railway station which can help reducing road traffic significantly, and deregulated bus services cannot be steered to pre-emptively provide alternatives. • The Plan does not provide any guarantee for infrastructure delivery which will be required to support the increase in housing levels. Further increasing traffic levels will only impair the quality of life of residents. • Any further housing development should minimise the requirement for vehicular traffic, and sustainable transport options should a requirement for proposed sites. • Cycling provides an ideal means of short and medium range commuting. Despite this cycling receives little more than lip service in the Local plan. There is a great opportunity to promote cycling as a low-carbon, low impact, sociable and healthy means of transport which contributes to the quality of life of residents. The NPPF requires plans to identify and coordinate development requirements, including the provision of infrastructure. The Plan does this, but offers inadequate assurance that they will be carried out in a timely and coordinated way. The transport infrastructure already operates at or beyond capacity which is well-documented.</p>	
General Transport (1)	<p>The Plan is not in line with NPPF paragraph 17 and paras 29-35 which require a rebalancing of transport towards sustainable modes, and there is also relatively little evidence that the Plan complies with NPPF paragraph 41, where investments in sustainable transport are prioritised in order to reduce the need for costly additional transport infrastructure. Stagecoach is concerned about the confusion within the Plan and the IDP, as to how bus service enhancements are to be funded. The IDP schedules refer to both CIL</p>	<p>The plan includes a number of improvements to public transport that are consistent with the existing and emerging Local Transport Plan. Public Transport improvements are a strategic priority as set out within the LTP 4.</p>

Category	Summary	Council Response
	and s106 funding mechanisms. Stagecoach would prefer that public transport is funded with s106 money instead of CIL money as s106 provides more certainty. Furthermore Stagecoach would welcome if public transport would become a political and funding priority.	
General Transport/ Nicola Blackwood MP	<p>Mrs Blackwood makes clear that infrastructure improvements must be completed before expansion. To keep pace with and being able to cope with the forecasted population and economic growth not only have the necessary homes but also a strong system of infrastructure needs to be in place. Without investment in infrastructure the sites are considerably less suitable. In areas such as provision of waste collection and roads the ambitious house building of the District Council cannot be successfully delivered without key infrastructure investment from OCC. The Infrastructure Delivery Plan (IDP) produced by the Vale seems to be inadequate, as information from NHS England and the Clinical Commissioning Groups (CCGs) are missing. Therefore the Vale is unable to provide necessary assurances as to how health care providers can ensure health care is sufficient and fully funded. Some of the villages drawn upon in the Local Plan simply do not have the infrastructure to support such extensive development (including roads, pavements, flood protection measures, schools, medical services, provision for shopping and leisure needs, public transport, parking etc.). Where infrastructure lags behind development this inevitably leads to a degradation of services. Specifically the A34 and A40 suffer from poor journey times. The delays caused by congestion are a cost borne by businesses and can lead to less productive employees. These (and other) capacity restrictions limit the ability for communities to access the full range of services. Despite some improvements at the Botley and Peartree junctions, a diamond junction at Lodge Hill is still desperately needed. Capacity issues along the route are a barrier to growth and will only be exacerbated by an increase in housing. There are also major traffic issues on roads such as the A420. Oxfordshire County Council (OCC) has committed to a Route Strategy for the A420 as part of the new Local Transport Plan, but that will not be complete until spring 2015. The necessity of every single housing allocation – either located in the AONB, Green Belt or elsewhere – should be reviewed. The question is</p>	<p>The Council recognises the importance of planning for effective infrastructure delivery and has worked hard to prepare a comprehensive Infrastructure Delivery Plan, which, for example, not only sets out what infrastructure is needed and how it will be funded and delivered, but also a delivery trajectory. This clearly demonstrates how infrastructure will be delivered ahead of, or alongside, housing and employment growth.</p> <p>The Council have engaged with a wide range of stakeholders and have sought to engage with health care providers. It should however be noted that the Infrastructure Delivery Plan is a 'live' document and can and will continue to be updated as and when appropriate.</p>

Category	Summary	Council Response
	whether a particular housing site is needed at all costs? Brownfield and regeneration sites should be prioritised. Where possible development on Green Belt and AONB land should be avoided.	
Health Care	<p>A number of comments relate to the need for additional provision of health care services. These include:</p> <ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) produced by the Vale seems to be inadequate, as information from NHS England and the Clinical Commissioning Groups (CCGs) are missing. Therefore the Vale is unable to provide necessary assurances as to how health care providers can ensure health care is sufficient and fully funded • Abingdon Town Council – who set out the need for additional dental services • The expansion of the Abingdon hospital in capacity and with an A&E department or operating theatre is required • New services and facilities should be planned to meet the demand created by new development and be delivered at appropriate timescales. This will ensure that the needs of both the existing community and future residents are provided for • Planning permission for new development will therefore only be granted once the delivery of infrastructure within appropriate timescales has been secured • The need for infrastructure is not adequately addressed in the Plan, particularly where Healthcare is concerned. Residents of Chilton generally look to Didcot for their doctor, but so too will those from Great Western Park, Valley Park, Milton Heights, Harwell, and others. Doctors' surgeries in Didcot are buckling under the weight even now and the paragraphs in the Infrastructure Delivery Plan in this regard are woefully inadequate. This problem must be addressed • The Senior Partner expresses concerns about the quality of the medical services the surgery provides due to a growing population caused by the development. The surgery is close to capacity • Insufficient health infrastructure is planned for Wantage and Grove. • Emergency Services need to be improved to be able to support the increased population, and appropriate access to the housing sites needs to be provided. 	<p>The Council have sought information from appropriate stakeholders within the health sector and provision is made for contributions towards health care from the proposed strategic development. However, the IDP is a live document and further information concerning health care will continue to be added as appropriate.</p>
IDP	<p>A number of comments are made relating to the IDP. These include:</p> <ul style="list-style-type: none"> • The IDP is a high level summary of the essential infrastructure needed, but is not exhaustive. • In cases where viability constraints are identified, it has to be 	<p>The Council recognises the importance of planning for effective infrastructure delivery and has worked hard to prepare a comprehensive Infrastructure Delivery Plan, which, for example,</p>

Category	Summary	Council Response
	<p>made clear how draft Core Policies 7 and 24 (Affordable Housing) will 'interact'. • Not all infrastructure requirements are included in the IDP (e.g. Oxfordshire County Council (non highway) Health, Emergency Services and Thames Valley Police requirements). Further consultation is required to ensure the IDP is as comprehensive as possible. • There appear to be some anomalies in the IDP. The North Abingdon site is to provide a new primary school via a S106 obligation, but the CIL Regulation 123 List however suggests this would be funded by CIL as it is not one of the named exceptions. Thus the 123 List needs updating to include the North Abingdon allocation as one of the list of exclusions. Also the primary education contributions (via S106) need to be recalculated. The North Abingdon allocation is currently shown as paying the same financial contribution as North West Abingdon, but North Abingdon is also burdened with providing the land for the school. The 'gifting' of the land needs to be factored into the financial contribution sought from the North Abingdon scheme (and the sums in the IDP re-calculated accordingly). • As Police services and emergency services will be funded through CIL and not S106, explicit reference should be made to these in the CIL Regulation 123 List for the avoidance of any doubt. • Natural England would like to see the IDP section on GI to be retitled to "Leisure and Green infrastructure".</p>	<p>not only sets out what infrastructure is needed and how it will be funded and delivered, but also a delivery trajectory. This clearly demonstrates how infrastructure will be delivered ahead of, or alongside, housing and employment growth.</p> <p>The Council have engaged with a wide range of stakeholders and have sought to engage with health care providers. It should however be noted that the Infrastructure Delivery Plan is a 'live' document and can and will continue to be updated as and when appropriate.</p>
Infrastructure in Cumnor	<p>Around 25 comments were made relating to infrastructure in Cumnor. These include: • Cumnor's infrastructure is already at capacity (the schools are full with no room for expansion, traffic jams will only increase, the surgeries are at capacity, the sewage system struggles, etc.), and not able to cope with such a huge increase in the number of suggested houses • The Local Plan does not include any plans to upgrade or expand the local infrastructure, but it is vital that the infrastructure issues are resolved before the housing stock is increased • There are issues of traffic congestion locally, including: the A34 cannot cope with the current traffic needs; the B4107 is already dangerous to cross during busy times; an increase in traffic would cause snarl-ups and accidents; and the B4044 already suffers from recent development on Cumnor Hill • Development will give rise to unmanageable traffic problems</p>	<p>There are no proposals for development at Cumnor within the Local Plan.</p>

Category	Summary	Council Response
	within the village and present unreasonable risks to pedestrians including school children	
Kennington	Infrastructure provision in Kennington is inadequate for the proposed housing allocation. Any increase in housing would result in an increase in the volume of traffic, with the increased risk to all users. The chance of serious accidents occurring would dramatically increase. It is argued that little or no thought has been given to the provision of infrastructure (improvements to transport and health services) to support the Plan. The projected level of growth would result in chaos on the roads and lack of facilities for the new residents. It would have a disastrous effect on the environment and the countryside. Therefore objection is raised against the "South Kennington" proposal.	The plan is accompanied by an Infrastructure Delivery Plan that makes provision for appropriate infrastructure provision in relation to all sites allocated in the Local Plan.
Leisure	The Local Plan appears mainly concerned with the provision of open space and facilities associated directly with new development. The Local Plan is also supposed to ensure that communities have access to high quality open spaces and opportunities for sport and recreation which makes a very important contribution to their health and wellbeing. Significant development in the AONB will undermine this objective.	The plan is concerned with the provision of new leisure facilities (both built facilities and open spaces/ sports pitches etc.) and the protection of the existing environment. Saved policies within the Local Plan 2011 will continue to provide protection to existing sports pitches/ open spaces. These policies may be reviewed through the Local Plan Part 2 process.
Radley	Objects against the development proposed for Radley as it is expected that the development will not generate enough CIL money to provide increased Health and Education services. It is argued that the existing health and other services operate already at or even over capacity. Also the sewage infrastructure is over age and needs to be improved. Objects against the development proposed for Radley as it is argued that the existing infrastructure, especially the transport infrastructure, operates at capacity and would not be able to cope the increased strain. Much expenditure on infrastructure improvements would be needed. Objects as the existing road network is too narrow, poor state of repair and not able to support much more traffic at peak times. Sewerage system needs to be upgraded	<p>The Council has consulted extensively with infrastructure providers, including working in close partnership with Oxfordshire County Council, and developed a comprehensive Infrastructure Delivery Plan to ensure the proposed development is delivered alongside significant improvements in services and facilities. These improvements, for example, include a significant package of highway improvements.</p> <p>The plan has been informed by detailed evidence and testing, including the testing of development viability based on the detailed understanding of infrastructure requirements. The infrastructure requirements for each site are set out within the Development Site Templates within Appendix A of the plan.</p>

Category	Summary	Council Response
		The Council is satisfied the proposals, taken in the round, will deliver sustainable development.
Rail Network	Developer Contributions: The Local Plan should request developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. Network Rail is a publicly funded organisation and thus not responsible to fund rail improvements necessitated by commercial development. Network Rail would like to see the following points included to ensure that developer contributions can deliver appropriate improvements to the rail network: - A requirement (Policy) for development contributions to deliver improvements to the rail network where appropriate. - A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. - A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements.	The Council consider that this matter is adequately provided for within CP7. It is not thought to be necessary to develop a specific DM policy relating to the funding of rail infrastructure that is generally dealt with through separate funding mechanisms.
Shrivenham	Much of the housing is due in the first five years, predicated on jobs that may or may not be there and the required infrastructure improvements will almost certainly not be there. The NPPF requires that plans identify and co-ordinate development requirements, including the provision for infrastructure, but the Local Plan does not offer adequate assurance that infrastructure projects will be carried out in a timely and co-ordinated manner. The IDP should be an integral part of the Plan, produced, costed and scrutinised in tandem with the Plan, to allow the assessment of the planned infrastructure improvements. Housing needs to be directly linked to job creation and infrastructure improvements should come before house building. The transport infrastructure operates already beyond capacity (e.g. A420, A34, and A417) and is well documented. Public transport should be brought back under public control. The findings of the 'Transport Route Congestion Assessment on A419/A420/A415 Link' by Bob Hindhaugh	The Council has consulted extensively with infrastructure providers, including working in close partnership with Oxfordshire County Council, and developed a comprehensive Infrastructure Delivery Plan to ensure the proposed development is delivered alongside significant improvements in services and facilities. These improvements, for example, include a significant package of highway improvements.

Category	Summary	Council Response
	<p>Associates Ltd, (existing hazards, design flaws and defects along the A420) have not been addressed in the Local Plan. And the majority of new residents will be commuting along this route. It is criticised that the Vale relies on developer-led Transport Assessments as a mechanism to secure funding, rather than to specify their requirements to improve this strategic link. Furthermore there has been no consideration of the cumulative impact of expansion in neighbouring districts, e.g. the Eastern expansion of Swindon on the Western Vale's resources and infrastructure. As it seems to be evident that infrastructure will follow, rather than precede the occupation of houses. The Plan cannot be considered to be effective or sound.</p> <p>Health care: The Local Plan does not tie development to improvements in Healthcare provision and facilities. The District Council seems to pass this on to Oxfordshire County Council as their problem rather than to address the need for increased facilities with increased housing numbers. Villages like Watchfield already suffer under a shortage of Healthcare facilities and rely on the Healthcare facilities from neighbouring authorities. There seems to be no evidence of cross-border co-operation to ensure such residents do not fall through the net in both authorities. Schools: The District Council simply passes this responsibility to Oxfordshire County Council as their problem. Broadband: There is no firm commitment to link technological infrastructure to development. Consistent and fast Broadband should be an integral part of living and working in rural areas, but most villages suffer from a substandard or absent service. A parallel commitment to match broadband infrastructure to development within the Local Plan is required.</p>	
Social infrastructure	<p>A number of comments are made relating to the provision of social infrastructure. These include:</p> <ul style="list-style-type: none"> • The Christ Church Abingdon/Church of England parish for North Abingdon express the desire to help build new communities and suggest the following is needed: <ul style="list-style-type: none"> o A plot of land for a new church that could also be used for the community (as has been done in Bicester with Emmanuel Church) o A community centre which would be designed to enable the church to lay on events and activities which build up the community, and on Sundays for worship (as has been done in Long Furlong Abingdon) o Make the planned school an enhanced school, with an 	<p>The Local Plan 2031 Part 1 set's out a strategic framework for the district. Social and Community infrastructure requirements are set out within the Development Site Templates. Further opportunities exist for localised requirements to be addressed through the planning application stage, for example identified by Town and Parish Councils, or through the Neighbourhood Plan process.</p>

Category	Summary	Council Response
	<p>additional hall, office and storage space for a church to use midweek to offer events and activities which build up the community, and on Sundays for worship. • The Theatre Trust considers the submission version of the local plan to be unsound because there are no policies in Part 1 to protect and enhance the community and cultural facilities. It is demanded that Policy 7 itself clearly includes “social facilities”. Specific policy wording is proposed. • The Plan needs to be more precise and clear about the hard and soft social infrastructure facilities and services. The provision of touchdown spaces in a community building or school is considered necessary.</p>	
Timing of Infrastructure provision	<p>A number of comments relate to the timing of infrastructure delivery. These include: • A timetable is needed for infrastructure delivery • The Plan needs to make sure that at all times adequate infrastructure is provided for the residents of new developments even if a development should not be completed • Infrastructure should be delivered in advance of house building • The Plan is considered to be unsound as there is a shortfall in funding of circa £119m, so some planned infrastructure developments are not funded, and accordingly there is no reasonable prospect that the planned infrastructure can be delivered in a timely fashion</p>	<p>Infrastructure delivery, including timing, is set out within the Infrastructure Delivery Plan.</p>
Wantage and Grove	<p>A number of comments state that many hundred new homes have been built in Wantage and Grove in the last 15 years. These developments should have generated S106 payments which in turn should have produced improvements (road, education and medical support capacity). But it is not clear whether these monies have all been collected. Furthermore, it is not clear which of those collected have been spent and on what. But the infrastructure in both places has not materially or visibly improved: • The quality of road surfaces in Wantage and Grove and the wider Vale area have deteriorated considerably • The A417 to Rowstock is extremely busy at peak times and seems to be beyond capacity • the primary schools in Wantage and Grove are at capacity and children have been bussed to outlying schools for a number of years • The secondary school will run out of places in 2016 • The doctor’s surgeries are virtually full and nothing is in place to expand their buildings to accommodate increases in population • The police station in Wantage has closed and a small replacement office is manned on a few</p>	<p>The plan is accompanied by an Infrastructure Delivery Plan that makes provision for appropriate infrastructure provision in relation to all sites allocated in the Local Plan.</p>

Category	Summary	Council Response
	<p>hours per week basis • The nearest A&E facility is the JR in Oxford. The minor injuries unit at Abingdon is not 24 hours and the X-ray equipment there is often unavailable to investigate injuries further. • Bus services to other than Didcot and Oxford are not good and aspects of those services are under threat • The amount of land allocated to car parking has been reduced. • It is suggested that the Crab Hill development should make contributions to the increased capacity of secondary schooling in Wantage. Questions are raised whether the S106 and CIL monies will be collected in a timeframe that will allow spending on the infrastructure and if it will be sufficient to fund the planned infrastructure. It is argued that improvements have been demanded for many years, but nothing had been done so far and nothing concrete (where, what and when) is planned during the life of the Local Plan 2031.</p>	
Wantage and Grove (1)	<p>It is suggested that the Crab Hill development should make contributions to the increased capacity of secondary schooling in Wantage.</p>	<p>The development will make contributions to increasing the secondary school capacity within the Wantage and Grove area in accordance with standards set out by Oxfordshire County Council.</p>
Water and waste water infrastructure	<p>A number of comments were received relating to insufficient planning for water & sewage infrastructure. These include: • Some comments demanded that a strategy for sustainable water resource management is put in place • Objections were received on grounds of insufficient planning for water & sewage infrastructure in the Wantage area • The Infrastructure Delivery Plan discusses upgrades to sewage treatment works but fails to take into account the need to upgrade the sewer network throughout the village of East Hanney. Without this, the needs of existing residents for effective sewerage and drainage are being disregarded • Further development without appropriate prior improvement to drainage and sewerage systems risks making business uneconomic and homes uninhabitable. NPPF Para 28 states that local plans should support the sustainable growth and expansion of all types of businesses and enterprise in local areas – our business is being undermined by the impact on ageing sewers of new development.. • The Plan is considered to be neither effective nor consistent with the NPPF due to the inability of Thames Water to accommodate all of the proposed site</p>	<p>The Council have prepared a Water Cycle Study in partnership with the Environment Agency and Thames Water. The Council is aware of shortfalls that exist and have ensured that appropriate upgrades are incorporated into any development coming forward. This is made clear within the Development Site Templates (Appendix A).</p>

Category	Summary	Council Response
	allocations in the Wantage area as demonstrated by the Water Cycle Study (WCS). There is “insufficient evidence to confirm that the planned increase in demand can be met.” Upgrades are likely to be required. Thames Water raises concerns that upgrades and reinforcement to sewage treatment works will be secured via S106 agreements, which they consider is not the appropriate mechanism for funding such upgrades.	
West of Didcot	The infrastructure plans do not meet NPPF paragraph 156. - The local network across the town for public transport, vehicles, cycles and pedestrians has to be prioritised. - The sewerage system needs to be upgraded, as this will take some years’ time no additional housing should be connected to the existing sewage system until these improvements have been completed. - The 5 year capital investment plan of Thames Water will not meet the Plan's timeline (water provision). - Education is an essential need that is not properly planned for West of Didcot. - Health needs: poor access to existing health centres and reduced convalescent bed numbers at Didcot Hospital. No minor injuries unit locally. No after hours provision locally. Emergency Services-no response. Travel congestion on major roads, especially on the A34 is leading to concerns over access to Oxford hospitals, especially A&E. - Electricity network improvements are identified	The Council has consulted extensively with infrastructure providers, including working in close partnership with Oxfordshire County Council, and developed a comprehensive Infrastructure Delivery Plan to ensure the proposed development is delivered alongside significant improvements in services and facilities. These improvements, for example, include a significant package of highway improvements.
Wording of Core Policy 7	Draft Core Policy 7 should be amended to remove clause iii and to make clear how the Council will balance infrastructure provision and affordable housing provision - where a development is demonstrated to be unviable. Concern is raised about the suggestion that, as a last resort, the Council would refuse planning permission if a major development would be unsustainable without the inclusion of unfunded infrastructure requirements (criterion iii). LIH’s view is that, particularly insofar as strategic allocations are concerned, it is incumbent on the Council to work closely with land owners and developers at the plan-making stage to ensure that the policy requirements and the requirements of the Infrastructure Delivery Plan (IDP) in relation to such sites are: (a) Consistent with the requirements of the three legal tests set out in Regulation 122 of the CIL Regulations and at paragraph 204 in the NPPF; and (b) Are capable of being borne by the development without having an adverse effect on its liability. As drafted,	The Council agrees that this minor change provides useful clarification.

Category	Summary	Council Response
	<p>there is also potential inconsistency between the first paragraph in Policy CP7 and the CIL provisions in the last four paragraphs of the policy. If CIL is adopted, developers who may be bringing forward other sites in Science Vale (LIH acknowledges and welcomes the Council's decision to propose a 'nil CIL rate' in respect of Crab Hill) may not be in a position to ensure the "timely delivery" of "necessary" on-site and off-site infrastructure requirements arising from the proposal. It will depend on how/when pooled contributions are collected and who / which body is ultimately responsible for the delivery of that infrastructure.</p>	