

Chapter 6: District Wide Policies

Core Policy 22: Housing Mix

Category	Summary	Council Response
Core Policy 22 Housing Mix.	A number of comments raising concerns regarding CP22: Housing Mix, relating to: an overly prescriptive policy on house-types which could stifle housing building, the Local Plan needs to recognise developers of market housing understand the local market demand better and smaller properties tend to be the affordable units, unclear how would the housing mix be deemed not appropriate, and where is the evidence, and Oxfordshire County Council states it is essential that the mix of development include a range of smaller dwellings to provide choice for older people looking to downsize. Furthermore, it is suggested that Core Policy 22 needs to recognise that developers of market housing will understand the local market demand better than anyone and this information will be used to determine an appropriate market housing mix for both site allocations and in the determination of planning applications. A need is identified for supporting self-build housing types.	The policy reflects the outcomes of a robust up to date SHMA (HOU01-01.3) which thoroughly assessed housing needs including the mix of housing required. This is in accordance with the NPPF which states LPAs should plan for a mix of housing as to deliver a wide choice of homes. The policy provides flexibility to enable each scheme to be assessed on its own merits, where necessary. Policy on more detailed matters such as self-build will be addressed in Local Plan 2031 Part 2.
English Heritage - Overview section (Page 90)	English Heritage welcomes the reference to protecting the Vale's high quality natural and built environment in the Overview on page 90, but we would prefer "conserving and enhancing" to "protecting" as terminology more consistent with the NPPF and "high quality natural, historic and built environment" as not all historic features are "built".	The Council agrees with English Heritage, the improved wording is more consistent with the NPPF.
Object Core Policy 22: Housing Mix.	A number of comments object to CP22: Housing Mix, relating to: the Policy not being in conformity with the NPPF, as too much reliance in the SHMA providing an overly prescriptive decision being taken which could lead to imbalances in the provision of housing on sites, not providing a mix, and the test for an alternative non-SHMA mix is excessive in the plan in that it requires an alternative to be demonstrated which could bring into question the validity of the SHMA.	The SHMA (HOU01-01.3) provides a robust, up to date assessment of housing need including the mix of housing required which the policy reflects. This is in accordance with the NPPF ensuring a wide choice of homes is provided. The policy provides flexibility to enable each scheme to be assessed on its own merits, where considered necessary. This does not question the validity of the SHMA, however recognises there may be some circumstances where an alternative mix is appropriate.

Category	Summary	Council Response
OCC - Core Policy 22 Housing Mix	16.The Plan seeks a dwelling mix on new development in accordance with the SHMA. It is essential that it also includes a range of smaller dwellings to provide choice for older people looking to downsize.	The Council acknowledges and agrees with Oxfordshire County Council on this point which is recognised within the SHMA (HOU01-01.3) and the Plan as a whole.
Support Core Policy 22 Housing Mix	A number of comments support CP22: Housing Mix specifically the flexibility to respond to changing circumstances.	The Council acknowledges support for this policy and its flexibility.

Core Policy 23: Housing Density

Category	Summary	Council Response
Core Policy 23: Housing Density	A number of comments received regarding CP23: Housing Density, raising concerns relating to: need to explore higher densities in urban locations and the possibility of a garden city rather than bolt on developments to multiple areas; the policy is vague about maximum densities as using higher densities can lead to less high quality design with cramped layouts not providing the required infrastructure; two dense requirement as most parts of the Vale are much lower densities and this policy will have a significant impact on the character these areas; the Policy should consider the effective use of previously developed land; and it is not clear where 30 dph has come from.	The policy sets out a minimum density of 30 dph to ensure land is efficiently used throughout the district. Alongside this, the policy also enables differing densities to be provided to reflect local circumstances and encourages higher densities in appropriate locations including potentially previously developed land. The Council consider a maximum requirement to be inappropriate that could stifle higher density developments in appropriate locations. Further advice is provided in the Design Guide SPD (BHE05-05.3).
Object Core Policy 23: Housing Density	Three comments received objecting to CP23: Housing Density, relating to; the minimum requirement and higher densities are encouraged as this is not appropriate for villages, and densities in the Local Plan should not be based on medieval villages as referred to in the text.	The policy sets out a minimum density of 30 dph to ensure land is efficiently used throughout the district however the policy is also flexible enabling differing densities to be provided to reflect local circumstances. Paragraph 6.7 of the Plan provides context to the policy referring to previous types of successful high density developments however the policy is not based on this.
Support Core Policy 23: Housing Density	Around 4 comments supporting CP23: Housing Density however a few concerns were raised; there is no requirement in the NPPF for “specific local circumstances” and the minimum density requirement should not be stipulated as properties for the elderly are likely to be much lower densities.	Support acknowledged. The NPPF states LPAs can set densities to reflect local circumstances therefore the requirement of 30 dph is in accordance with national policy. The policy is sufficiently flexible to enable differing densities to be provided to reflect local circumstances. The Plan also provides a specific policy on accommodating the needs of the ageing population (CP26).

Core Policy 24: Affordable Housing

Category	Summary	Council Response
Core Policy 24: Affordable Housing.	A number of comments raised a number of issues regarding Policy CP24; whether the evidence for the policy had factored in the need for community facilities and services from sites; consideration needed to the delivery of flats near to services to meet the needs of first time buyers and the elderly; and how the Council will successfully implement the policy given a poor track record in implementation.	The Plan is supported by a Viability Study (INF01) which demonstrates a thorough viability assessment has been undertaken on the Plan as a whole including the affordable housing target and the need to ensure community facilities and services can be delivered. The needs of the ageing population are provided within CP26 and the Council is proposing to monitor the delivery of affordable homes.
Object Core Policy 24: Affordable Housing	A number of comments have objected to Policy CP24 specifically regarding: both the target is too high and is unviable and the target is too low and should be increased to 40%; no mention of extra care housing; private rental sector is un-regulated and it is impossible to see how "affordable private rental accommodation" can be built therefore the affordable target should comprising a mix of 13.5% intermediate and 86.5% social rented housing; viability modelling has not considered the effect of 35% affordable, housing modelling has factored-in actual S106 and S278 costs but it has not factored-in a CIL, so while we accept that 35% affordable housing should improve viability, once a CIL is factored-in this could jeopardise viability; more evidence needs to be provided to demonstrate whether these strategic sites can sustain 35% affordable housing in combination with infrastructure payments; and ,the policy should acknowledge that where a proposed development addresses a specific local need, such as retirement housing, it may be appropriate to seek an alternative to onsite provision through, for example, an offsite financial contribution.	The Plan is supported by a Viability Study (INF01) which demonstrates a thorough viability assessment has been undertaken on the Plan as a whole including the affordable housing target to ensure it is viable. The testing includes the strategic sites ensuring the affordable housing target in combination with infrastructure can viably be delivered. The Council has also prepared a CIL Draft Charging Schedule (CIL02.1) which is informed by the positive conclusions of viability testing of the proposed CIL rates alongside the proposed level of affordable housing The policy also allows for a lower level of affordable provision where justified by a robust site viability assessment . The policy sets out different ways that affordable housing can be provided depending on site circumstances including viability, ensuring the policy is flexible and deliverable.
OCC - Support Core Policy 24: Affordable Housing	Oxfordshire County Council supports Policy CP24 however would like to see CP7 revised to clarify the assessment steps required to demonstrate viability is an issue (as stated within para 6.12) .	The Council acknowledges support for this policy however the Council do not wish to set a rigid assessment in place. The assessment should reflect the needs of that scheme through an open book approach.
PPG Core Policy 24: Affordable Housing.	A number of comments have highlighted the recent changes to the Planning Practice Guidance and therefore the wording of CP24 needs to be less prescriptive, in particular the required split for rented and	The Council agree the threshold in CP24 should be modified to reflect changes to the Planning Practice Guidance. However the policy is already sufficiently flexible to enable a viability assessment to be

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	intermediate housing is too rigid and as such the Council should include 'subject to negotiations' regarding split.	provided where developments are potentially unviable including the delivery of rented split.
Support Core Policy 24: Affordable Housing	A number of comments support CP24 stating that lowering the percentage of affordable housing on qualifying sites to 35% will assist viability, whilst still ensuring that the OAN for affordable housing can be met in full. Also the flexibility set out in the policy will help to ensure that irrespective of changing circumstances sites will be deliverable. However one comment did highlight the implications of the changes to the Planning Practice Guidance with a change to the first sentence of CP24 as follows: "The council will seek 35 % affordable housing on all sites capable of a net gain of 10 or more dwellings or which have a maximum combined gross floorspace of more than 1000sqm."	The Council acknowledges support for the threshold and flexibility of the policy. The Council agree the threshold in CP24 should be modified to reflect changes to the Planning Practice Guidance.

Core Policy 25: Rural Exception Sites

Category	Summary	Council Response
Core Policy 25: Rural Exception Sites	Around 4 comments have raised two concerns; in agreeing methods for housing assessments with Parish Council as stated in the Policy, the Parish will refuse to undertake such surveys as an excuse not to place pressure upon them to deliver rural exception sites; and there is a real threat to rural sites under this policy, to the countryside and to character of Vale villages.	The Council consider the policy ensures specific needs of the rural community can be met with support from the Parish Council and without posing a threat to rural sites.
English Heritage - Core Policy 25: Rural Exception Sites	English Heritage welcomes criterion vii however reference to Registered Historic Parks and Garden is incorrect, the list of designated assets should include Scheduled Monuments rather than “etc.” and Non-designated heritage assets should be referred too. This omission in combination with other omissions does not quite set a positive strategy for the historic environment.	The Council agrees with English Heritage as the modification provides more accurate wording.
OCC - Core Policy 25: Rural Exception Sites	Oxfordshire County Council supports this policy however would like the criteria to include that highways issues can be mitigated	The Council acknowledges support for the policy however considers the Plan as a whole appropriately covers the consideration of highways issues thus a specific reference is not considered necessary.

Core Policy 26: Accommodating Current and Future Needs of the Ageing Population

Category	Summary	Council Response
Core Policy 26: Accommodating Current and Future Needs of the Ageing Population	A number of comments regarding Policy CP26, which relate to: further clarity is required from the policy as to whether it is seeking a specific provision of lifetime homes on all sites or whether this expressly focuses on age restricted dwellings; shooter shelters should be provided; and the Plan does not provide measures against which performance can be reviewed.	The policy sets out that where housing for the ageing population is provided, it should be to Lifetime Homes standard. There is no specific requirement within the policy for lifetime homes. There is a Monitoring Framework within Appendix H that will monitor the performance of this policy. The Plan as a whole as well as Local Plan 2031 Part 2 provides for specific and appropriate transport requirements.
Core Policy 26: Accommodating Current and Future Needs of the Ageing Population.	A number of comments regarding Policy CP26, which relate to: further clarity is required from the policy as to whether it is seeking a specific provision of lifetime homes on all sites or whether this expressly focuses on age restricted dwellings; shooter shelters should be provided; and the Plan does not provide measures against which performance can be reviewed.	The policy sets out that where housing for the ageing population is provided, it should be to Lifetime Homes standard. There is no specific requirement within the policy for lifetime homes. There is a Monitoring Framework within Appendix H that will monitor the performance of this policy. The Plan as a whole as well as Local Plan 2031 Part 2 provides for specific and appropriate transport requirements.
Core Policy 26: Accommodating Current and Future Needs of the Ageing Population and Chapter 5 Abingdon-on-Thames and Oxford Fringe Sub-Area.	One comment raised that the redlined area in Map 5.3 is based on a developer's idea of expanding the Botley Local Centre into a District Centre. The western end of that redlined area is the location of Field House' an age restricted housing complex with 67 units. If the redlined area is left as it is a future developer could argue for the demolition of Field House and have no obligation to replace it.	The council considers that the wording of Core Policy 11 is acceptable. The council recognises the concerns raised by the public with respect to the defined red outline of the map, and the level of opposition to the redevelopment of Field House and other structures to the west of the site.
Object Core Policy 26: Accommodating Current and Future Needs of the Ageing Population	Objection to the requirements of the policy as it is not clear what the Policy is seeking from other forms of residential development which are not specifically targeted to meeting the needs of an ageing population	The Policy ensures accommodation intended for the ageing population is delivered to satisfactory standards.
OCC - Core Policy 26: Accommodating	Oxfordshire County Council supports this Policy however the policy does not set out the circumstances in which such specialist provision	The Council acknowledge the County's comment and welcomes continued engagement on the delivery of specialist housing.

Category	Summary	Council Response
Current and Future Needs of the Ageing Population	will be required. The County Council will work with the Vale to Plan and deliver specialist housing.	
Support Core Policy 26: Accommodating Current and Future Needs of the Ageing Population	Around 3 comments support Policy CP26 however they have also highlighted a few issues; the policy should encourage the provision of retirement housing; reference to the provision of specialist, market housing for the elderly is a necessity; and the policy could be taken even further as specialist accommodation, such as retirement housing, should have its own separate development scenario	The Council acknowledges support. The Council are taking a positive approach to recognising the need to provide for an ageing population and consider the policy is not too prescriptive as to ensure flexibility and not stifle the delivery of accommodation. If it is considered further detailed policies are required for the accommodation for the ageing population, then this will be considered within Local Plan 2031 Part 2.

Core Policy 27: Meeting the housing needs of Gypsies, Travellers and Travelling Show People

Category	Summary	Council Response
English Heritage - Core Policy 27: Meeting the housing needs of Gypsies, Travellers and Travelling Show People	English Heritage welcomes criterion v. of Core Policy 27 for the reference to the AONB and heritage assets and their setting, as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by the NPPF.	The Council acknowledge English Heritage's support.
OCC Core Policy 27: Meeting the housing needs of Gypsies, Travellers and Travelling Show People	Gypsy and Traveller Sites The Plan states that expanding existing sites will be one of the ways of identifying the extra need. The county owns and manage two sites within the Vale, these are the Red Bridge Hollow Caravan site just off the Old Abingdon Road near to Oxford and WoodHill Lane Caravan site in East Challow near Wantage. The Red Bridge Hollow site no longer has any room for expansion as within the past two years 9 extra pitches have been provided to the site which has been on OCC land. The site now has 24 pitches and if was any bigger it would be unmanageable. The Woodhill Lane site is a 12 pitch site and is surrounded by farm land so expansion would only be sort by purchasing land but with the reputation of the site it is very unlikely the land owner would be open to this.	The Council acknowledges these points. The policy sets out a number of methods of meeting needs and the most appropriate will be taken forward. The Council welcome continued engagement on the provision of pitches with the County.

Core Policy 28: New Employment Development on Unallocated Sites

Category	Summary	Council Response
Milton Heights Services	There was one comment of support for Core Policy 28, with no objections however would like Milton Heights Services to be allocated for mixed use development.	Services at this location serve an important strategic function for the A34. TR10 (Lorries and Roadside service) is a saved policy which will be reviewed through Local Plan 2031 Part 2.

Core Policy 29: Change of Use of Existing Employment Land and Premises

Category	Summary	Council Response
CP29 - Objection	One other objection states the policy could allow developers to sit on employment land thus proposed the policy includes a time restriction to demonstrate that there is no reasonable prospect of land or building being used for employment purposes.	Criterion (i) of Core Policy 29 relates to this comment. Clarity with respect to timescales has been provided as part of the supporting text through paragraph 6.37. It states that for a site to have no reasonable prospect of being used for employment purposes, "applicants will be expected to demonstrate that the site is no longer viable at present, or any other realistic and suitable, employment use. They must demonstrate that the site has remained un-sold or un-let for at least 12 months. In addition, applicants will need to provide evidence relating to the marketing of the site for its present use for a minimum period of 12 months up to the date at which the planning application was lodged. This should demonstrate that despite genuine and sustained attempts to sell or let a site on reasonable terms for employment use, they have failed to do so".
CP29 - Objection; Flexibility of Policy	Three objections were made to CP29, predominantly that part or all of the policy in its current position was overly restrictive and not in compliance with the NPPF, namely paragraphs 14-17, and 51. Nuffield Industrial Estate seeks relaxation of the policy to allow for greater flexibility for its units to be used for alternative uses and thus acknowledge the important role that sustainable alternative employment generating uses can have on the promotion of sustainable economic growth. Crown Packaging seeks a relaxation of the policy through removal of references in the supporting text to time related restrictions. Another comment states the policy approach is too onerous and the policy should be more positive to change of commercial uses to residential, in line with the NPPF (para 51), thus second section policy should be reworded.	Core Policy 29 is consistent with paragraph 51 of the NPPF as it permits the change of use of existing employment land through criterion (i) and (iii) of the policy, which seeks the applicants to demonstrate that there is no strong economic reason for the development to be inappropriate. This is also compliant with paragraphs 14-17 and allows sufficient flexibility for the change of use of such land.
CP29 - Support	There was one comment of support from Williams F1 towards Core Policy 29	Support has been welcomed and is noted

Core Policy 30: Further and Higher Education

Category	Summary	Council Response
CP30 - Minor objection	There were around three comments submitted for Core Policy 30 (Further and Higher Education). These were all broadly supportive of the policy, but sought minor amendments to the policy and/or supporting text, in particular that the same approach is taken to Harcourt Hill Campus and Cranfield University. Suggested modifications included making specific reference to certain educational facilities across the district.	The inclusion of specific references to certain educational facilities would not impact upon the effectiveness of the policy, but may imply that the policy would only relate to those quoted in the supporting text. Reference to the university campus at Harcourt Hill is made to link this section to a separate policy. Reference to Cranfield University at Watchfield is to provide clarity as its status is different to most further and higher education facilities in the district. University Technical Colleges offer an alternative approach to traditional schools, for age ranges between 14-18. As such it is not considered appropriate for making specific reference to them in this section. The council will continue to support such developments as appropriate when they come forward.

Core Policy 31: Development to Support the Visitor Economy

Category	Summary	Council Response
CP31 - Botley/Local Service Centre Objection	Five comments object to the level of hotel accommodation that Core Policy 31 allows for Local Service Centres. Two of these make specific reference that there is a lack of identified need for a hotel in Botley and three comments suggest the policy states that larger scale development will be supported in market town and local service centres to support visitor economy however shouldn't there be some evidence of need.	Hotel Needs Assessment identifies a significant need for hotel space in the district, including recommending potential locations. Reference is made in the Needs Assessment to strategic locations along the A34 as well as on the fringes of Oxford City. As Botley is approximately 1.5 miles from the centre of Oxford City and on a junction with the A34, the council considers this location as suitable in principle for the location of a future hotel development. Local Service Centres are highly sustainable locations as set out in the settlement hierarchy.
CP31 - General Objection	One general objection to Core Policy 31 stating that there is too much reliance on the visitor economy as it is labour-intensive and low-paid. It recommends the deletion of paragraph 6.42.	Noted.
CP31 - Heritage	English Heritage welcomes the reference to museums and heritage centres in clause ii. of Core Policy 31. We also welcome the reference to the re-use of a historic building as one of the exceptional circumstances in which larger developments will only be supported, although we would prefer "sensitively re-use". We would also prefer to see the addition of "and which would not adversely affect heritage assets or their setting" after "scale and character of the locality" in the final paragraph of the Policy. In itself and in isolation, English Heritage does not consider that these omissions are sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).	Support from English Heritage is welcomed and is noted. The recommended minor changes to the policy are not considered necessary as any such developments mentioned would need to have regard to the contents of Core Policy 39: The Historic Environment, and in particular criterion (i) of that policy.
CP31 - Other	Three general comments were made. Abingdon Town Council seek budget hotels as well as high end hotels. A separate comment states that the provision of hotels for Milton Park and Harwell Campus will damage the prospects of Didcot acquiring a town centre hotel. The	General comments to the Local Plan with no suggested changes to the plan.

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	final one is a comment on the level of visitor related development that can be provided at service areas on main transport corridors.	
CP31 - Support	One comment from Oxfordshire County Council support in principle the provision for new development which would support growth of the visitor economy	Support from OCC is welcomed and is noted.

Core Policy 32: Retail Development and Other Main Town Centre Uses

Category	Summary	Council Response
CP32 - Abingdon	One comment made with respect to the level of traffic congestion and pollution in Abingdon Town Centre. The comment seeks the provision of a park and ride to the north of Abingdon, at the expense of part of the strategic site allocation that would serve Abingdon-on-Thames and alleviate such issues.	The provision of a park and ride would principally seek to serve Oxford City, with a high quality bus service in place to link it to Abingdon-on-Thames also (similar to what exists at Redbridge on the Abingdon Road in Oxford). There is sufficient car parking within or near the town centre of Abingdon-on-Thames.
CP32 - Botley/Local Service Centres	There were four specific objections to Core Policy 32 which sought the removal of references to Botley and Local Service Centres supporting large scale developments, as well as the omission of any reference to Core Policy 11. There is also confusion about the separate functioning roles of West Way (Botley) and Seacourt Retail Park and applying town centre policies to local service centres. There is also an objection to the provision of town centre uses in Botley. The Policy should be much clearer in regard to these issues.	NPPF is clear the extent to which town centre policies apply, and includes "district centres and local centres" P.57/Glossary of the NPPF adds clarity to this. The council is working with key community groups and representatives on preparing a development brief for the Botley centre and it is envisaged that this will progress as an SPD supporting the existing and emerging Local Plans. It will seek to address appropriate uses for the site as well as guidance on the height, scale, massing and density.
CP32 - General	A general comment made with respect to the level of retail provision that may be acceptable at transport service areas.	Noted.

Core Policy 33: Promoting Sustainable Transport and Accessibility

Category	Summary	Council Response
Air quality.	It is suggested that a reference should be included in the policy to show how and how often air quality will be monitored.	Air Quality Monitoring is addressed separately through, for example, the designation of AQMA's and other highway restrictions - the Local Plan is considered to be consistent with the Council's Air Quality Strategy.
Bus services.	It is suggested that the policy is not specific and therefore ineffective. A strong and robust higher-level policy will be essential for the Science Vale AAP to ensure proper provision is made for bus services.	The policy sets a clear commitment to promoting sustainable transport and accessibility and has been prepared in close partnership with the Highways Authority.
Car parking	The plan fails to make adequate provision for managing car parking.	Parking standards are set out in policy made by the Highways Authority, Oxfordshire County Council and is separate to the LP process.
CP33	Traffic congestion on A34, A415, A417, A420 and A4130 is already at or above capacity in peak periods. Commuter rail services to London are already inadequate. Proposed public transport improvements are often aspirational and other infrastructure (incl. sewerage) already at capacity. Reduce the housing allocations to a level where there are not significant sections of the infrastructure (of all types, not just roads) operating at or above operational capacity.	The Vale Local Plan has been informed by detailed investigation of transport impacts, including through the preparation of a joint study working closely with the Highway Authority. A comprehensive package of infrastructure improvements are proposed, including significant enhancements to the highway network. The evidence demonstrates that the highway network will operate at a satisfactory level once the proposed infrastructure and housing have been delivered. However, work is ongoing, being led by the Highways Authority, to develop route based strategies, including for the A34.
Delivery of highway infrastructure	A number of responses have been received that relate to the provision of highway infrastructure. • It is suggested that the policy is unsound as it does not include a commitment to deliver transport infrastructure before homes are built. It is also suggested that the plan makes inadequate provision for transport infrastructure more generally. • The plan policies will significantly increase the population and employment in leading to a lot more people needing to travel. Traffic along rural roads will increase significantly because the car is the only reasonable option for travelling. There is no credible plan to deliver the core transport policies. The Infrastructure Delivery Plan appears to increase road capacity to accommodate more traffic. This	The Vale Local Plan has been informed by detailed investigation of transport impacts, including through the preparation of a joint study working closely with the Highway Authority. A comprehensive package of infrastructure improvements are proposed, including significant enhancements to the highway network. The evidence demonstrates that the highway network will operate at a satisfactory level once the proposed infrastructure and housing have been delivered. However, work is ongoing, being led by the Highways Authority, to develop route based strategies, including for the A34. The Infrastructure Delivery Plan sets out a clear timetable for delivering highway infrastructure alongside housing and employment

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	will only serve to increase noise and pollution. The plan should look to reduce the number of car journeys by locating housing near to employment and services, improving public transport and by providing safe cycling routes. Measures that are clearly against the core policies should be removed from the plan (e.g. junction improvements to increase traffic along rural roads and through villages). • Oxford City Council supports CP33 and in particular clause iv 'support improvement for accessing Oxford'. However, this will be challenging given the relatively dispersed pattern of proposed development. • The response describes how proposals for the Truck Road Services Area at Milton Park Didcot would accord with CP33.	growth. The main focus of new housing is within the Science Vale area where the majority of new employment will be located. The mix of housing and employment within the Science Vale area has been informed by an independent study (GL Hearn) to ensure balanced and sustainable development.
English Heritage - Policy wording	English Heritage welcome the reference to making towns and villages more attractive in clause Vi of CP33. However, we would prefer clause v to say ' amenities, character and special qualities of the surrounding area'. We also suggest the policy includes a reference to traffic calming/ management and public realm enhancement. Another response suggests that the importance of providing coherent transport solutions for the whole journey is not acknowledged as most journeys involve more than one mode of travel. More focus is needed to make modal transfer as easy as possible.	Agree to request from English Heritage for minor amendment to policy wording to reflect their preferred terminology concerning the historic environment. Other matters are deemed to be addressed by CP37.
Network Rail - Rail Services	A response from Network Rail confirms support for upgrading the railway station at Didcot (which falls within South Oxfordshire District Council area).	Noted.
OCC - Local Transport Plan 4	The County Council raise awareness of the emerging Local Transport Plan (LTP 4) and would welcome discussion in the lead up to the examination so that appropriate elements of emerging LTP can be included in the Local Plan.	The LP has been informed by the existing LTP 3 and the emerging LTP 4 and has also been prepared in close consultation with the Highways Authority. The Council welcome the recognition that the LTP should be informed by the emerging LP.
Oxford City Council - Delivery of highway infrastructure	6 – District wide policies Core Policy CP33 (sustainable transport) – The City Council supports in particular criterion (iv) 'support improvements for accessing Oxford'. However it is noted that this will be challenging given the relatively dispersed pattern of development	Noted.

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	set out in the Spatial Strategy, particularly given the challenges that exist on the road network especially the A34.	
Transport strategy	It is suggested that the plan makes little reference to transport linkages between the Vale and with adjacent settlements.	This matter is addressed through the LTP process. The strategy set out within the LP is consistent with wider strategic linkages, which are references within the document.

Core Policy 34: A34 Strategy

Category	Summary	Council Response
Delivery of highway Infrastructure	It is suggested that road improvements, including a diamond junction on the A34 at Lodge Hill and additional lanes between the M40 and Chilton are needed to be in place before any housing development takes place. It is suggested that without these improvements traffic congestion will be a critical factor. A separate response suggests that any improvements to the A34 will be prohibitively costly. The recent government announcement of highways improvements includes only CTV and information signs for the A34 (and minor changes to approach roads to 2 junctions north of Oxford). This will let drivers know how many miles long the queue is but will do nothing to prevent the frequent long queues. There appear to be no plans to widen the road or provide a much needed hard shoulder.	The Local Plan sets out a wide range of significant highway improvements, many of which are already funded and where delivery has already started ahead of future planned housing (including for example the upgraded interchange at Milton and also at Chilton). Furthermore, the Plan includes proposals for an upgraded junction at Lodge Hill, safeguarding of land South of Abingdon and between Didcot and Culham for future highway improvements, along with a range of other strategic highway improvements. Some of these matters are complex and will need to be brought forward through joint working with other partners including the Highways Authority and Highways Agency. Work is ongoing to ensure these matters are dealt with in a timely manner.
Oxford City Council - Transport strategy	Core Policy CP34 (A34 Strategy) – the City Council supports this policy.	Noted.
Policy wording	It is suggested that the policy wording is too narrow and should be replaced by a Strategic Roads policy which ensures that the east-west routes across the district are given as much attention as the main north-south route.	Noted. The Council has worked extensively with the Highways Authority and have identified a significant package of highway infrastructure. The focus of infrastructure improvements are around the Science Vale area, where the majority of housing and employment growth is focused. The Highways Authority are continuing to develop route based strategies for other routes (such as the A420 and A338) and so wider, yet more localised improvements, can be brought forward through the LTP process.
Relationship between proposed growth and A34 Strategy.	It is suggested that as the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear unsound 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	The Local Plan includes proposals for significant new highway infrastructure and has been informed by detailed investigation, including working in close partnership with the Highways Authority. Infrastructure delivery is being aligned to housing and employment growth as demonstrated by the trajectory set out in the IDP. Work is ongoing, led by the Highways Authority and Highways Agency to progress the Route Based Strategy for the A34. However, it has been demonstrated that the proposed highway improvements will be

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	located in this area with a full analysis as required by the National Planning Policy Framework. It is also suggested that the plan proposes a significant number of houses within a few miles of the A34 which will increase the traffic congestion on it to a level that seriously impacts on its ability to adequately meet the needs of the residents and businesses. The capacity of the A34 should be increased through additional lanes and consideration should be given to re-routing it away from the section through Botley.	adequate to accommodate the proposed growth, whilst longer terms plans for upgrading the A34 are taken forward.
Traffic Congestion (1)	It is suggested that improving access to the A34 is likely to lead to the route becoming more congested and that the route is already congested. Furthermore, the incidence of congestion of the A34 is frequent and often leads to congestion on the local highway network. It is suggested that the plan does not adequately seek to address this problem and is therefore unsound. It is premature to proceed with large scale strategic housing allocations adjacent to the A34 until road traffic implications have been better quantified and viable solutions included within associated infrastructure funding, to be implemented broadly concurrent with any roll-out of new housing. It is also suggested that the Solent-Midlands Route Based Strategy should be used to inform the development of the A34 Policy.	The Local Plan includes proposals for significant new highway infrastructure and has been informed by detailed investigation, including working in close partnership with the Highways Authority. Infrastructure delivery is being aligned to housing and employment growth as demonstrated by the trajectory set out in the IDP. Work is ongoing, led by the Highways Authority and Highways Agency to progress the Route Based Strategy for the A34. However, it has been demonstrated that the proposed highway improvements will be adequate to accommodate the proposed growth, whilst longer terms plans for upgrading the A34 are taken forward.
Walking and Cycling	Support for references in the plan to the promotion of cycling and walking however are vague.	Point noted.
West Berkshire District Council - Transport strategy	Core Policy 34: A34 Strategy The Local Plan recognises the A34's dual role as a nationally important strategic route as well as forming part of the local road network. The development sites and associated junction improvements identified in the Local Plan will undoubtedly increase traffic on the A34 corridor south of the Science Vale area, which are likely to generate significant additional demand for travel. The Downland section of the A34 in West Berkshire is a relatively unimproved section of dual carriageway which contains short slip roads from adjacent rural communities and steep inclines (in particular Gore Hill) that can slow down laden heavy goods	Noted.

Category	Summary	Council Response
	<p>vehicles. Even minor collisions have the ability to cause delays on this section, which can adversely impact on the connectivity between the Science Vale and the M4. The wider improvements considered for the A34 should show look beyond the Vale's boundary down to the A34 at Chieveley.</p>	
Air quality.	<p>The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust state that CP34 does not identify what 'further measures' would be required in order to rectify any adverse impacts of air pollution upon the Oxford Meadows Special Area of Conservation. The HRA states that: "The Council should supplement this [collaborative working with the Oxfordshire Planning Policy Group] via a plan commitment (...) to develop a framework by which air quality measures can be linked to monitoring of the air quality in the Oxford Meadows SAC before and for a number of years after introduction of the measures such that further measures can be devised if the air quality does not improve." The local plan has not secured a commitment to such further measures as recommended in the HRA should the monitoring indicate that there is an impact on air quality. It is suggested that for the Local Plan to be sound, Policy 34 needs to include a commitment to further mitigation measures should the monitoring indicate an effect on the SAC, and such mitigation measures need to be identified and demonstrably effective. A separate response suggests that the Council need to be more effective in dealing with poor air quality, particularly through Botley.</p>	<p>AECOM consultants prepared the HRA Report on behalf of the Council. The Council in collaboration with AECOM discussed the conclusion of the HRA Report. It was considered the Vale HRA conclusions are appropriate and minor wording changes have been incorporated into the conclusion.</p> <p>In addition to this, further monitoring indicators have be included in Appendix H of the Plan to ensure that the levels of NOx concentration are monitored in the future. This can be seen in the Council's 'Schedule of Proposed Minor Changes' (DLP11).</p> <p>CP43 sets out a requirement for proposals to have regard to air quality and Air Quality Management Areas in the District</p>

Core Policy 35: Promoting Public Transport, Cycling and Walking

Category	Summary	Council Response
Accessibility	It is stated that CP35 should make provision to ensure that pedestrian routes can be easily used by buggies and wheelchairs, such as the provision of dropped kerbs and even, flat surfaces.	This matter is addressed by CP37 and through Building Regulations.
Alternative Fuels	The Plan should make provision for introducing electric public transport vehicles and adequate charging points across the district and within the life of this plan. Solar pavements should also be considered.	This matter may be considered through the LTP process and /or through the Local Plan Part 2
Cycling	It is suggested that the plan lacks imagination and gives too little attention to cycleways. These should be provided in new development from the outset and should offset initial costs by health benefits, reduced emissions, and reduced wear and tear of roads.	The plan sets out proposals to significantly enhance the strategic cycle network (for example CP17) and makes provision to support wider enhancements where appropriate (CP35).
English Heritage - Policy Wording	English Heritage welcomes Core Policy 35, but we suggest that the Policy could include a reference to traffic calming/management and public realm enhancement schemes that enhance cycling and walking.	It is felt that the wording of CP's 35 and 37 are adequate and already provide for this matter.
Network Rail - Level Crossings	Network Rail request a policy is added to the local plan confirming the councils statutory responsibility under planning legislation to consult the statutory rail undertaken where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway.	The Council do not consider this to be a strategic matter for consideration in the Local Plan Part 1.
OCC - Public Transport	Public Transport General Oxfordshire faces immense challenges in accommodating planned residential and commercial development, whilst at the same time facilitating movement on a constrained transport network. In general, locating development along the main public transport corridors (such as Premium Bus Routes and close to rail stations) offers the best chance of attracting a high proportion of movement by public transport and thus reducing the number of additional cars which need to be accommodated on the County's road network. Bus services along the main Premium Bus Routes from Wantage, Abingdon and Botley to Oxford already operate quite frequently and these bus services can be increased relatively easily. Frequencies on some other routes, such as Swindon-Faringdon-Oxford and Harwell to Didcot	Noted.

Category	Summary	Council Response
	have increased recently, and will now become Premium Routes. Providing a credible level of public transport at a distance from rail stations, and/or a distance from Premium and 'development' bus routes is more difficult, although larger development sites in the Science Vale area (such as Great Western Park, Valley Park, Crab Hill and Grove Airfield) have been requested to fund additional bus services to significant centres (such as Oxford, Didcot) and to workplaces. As Oxfordshire's road network becomes more congested, it has become increasingly important to plan and provide priority measures for buses, including at traffic signals, along bus lanes and through providing fully-segregated busways.	
Oxford City Council - Public Transport	CP35 Public Transport Walking Cycling – the City Council supports this policy. It is noted that paragraph 6.75 acknowledges that increasing these modes will be difficult in rural areas, which points to need to focus more development close to urban areas and particularly Oxford which has amongst the highest non-car mode share in the country.	Noted.
Parking Standards	It is suggested that the plan should include new parking standards for residential development.	Parking Standards are set by the Highways Authority and sit outside the remit of the Local Plan.
Policy wording	Stagecoach state that the policy is non-committal on the imperative to achieve mode shift towards sustainable modes, and is weakly drafted, with insufficiently robust statement of intent. Given the distances that many residents will need to cover to access jobs education and facilities, the lack of reference to appropriate design of developments to facilitate efficient bus penetration is a major omission. Delivery of efficient and direct public transport to or through new developments is easy to compromise through inconsiderate urban design. Wording of Core Policy 35 is out of conformity with national policy. English Heritage welcomes Core Policy 35. However, they suggest that the policy is amended to make reference to quality of areas subject to transport improvements and include reference to traffic calming and schemes to enhance public realm.	Specific reference is made to the delivery of priority public transport schemes within the proposed development at Valley Park (CP17 and Development Site Template) - this has been informed by dedicated evidence. The wider wording of CP35 is considered to be adequate and has been prepared in partnership with the Highways Authority (OCC).
Public Transport	A number of comments relate to public transport provision. These include: <ul style="list-style-type: none"> • Stagecoach state that the policy language within the Plan is highly focused on providing for car-borne movements first. While 	The plan includes reference to improvements to public transport as informed by LTP3 and the emerging LTP4 and the Council has worked closely with the Highways Authority (OCC) in preparation

Category	Summary	Council Response
	<p>improvements to public transport are repeatedly referred to, there is little or no definition of how this will be specified or accomplished, and at least as importantly. • The objective of reducing use of cars though for example improvement of the frequency of buses is also a worthy one. However the argument for this actually happening is not convincing. • West Berkshire District Council supports this policy which appears to fit well with the aspirations for a strategic bus corridor linking Oxford, Didcot, and Science Vale with Newbury. West Berkshire would not wish to see undesirable increases in traffic on unsuitable cross-boundary routes, in particular the A338 south of Wantage and the A417 east of Didcot through Streatley as an alternative to the A34/M4 towards Reading. • Oxford City Council supports this policy. Difficulties in increasing these modes of transport in rural areas points to the need to focus more development close to urban areas and particularly Oxford. • The Plan does not support sustainable public transport enough. It should say that no planning permission should be granted for house building until a firm plan is drawn up to re-open Grove station. Greater emphasis on such schemes - into of road building/improvements would create a better environment. Locating development along the main public transport corridors (such as Premium Bus Routes and close to rail stations) offers the best chance of attracting a high proportion of movement by public transport and thus reducing the number of additional cars which need to be accommodated on the County's road network. As Oxfordshire's road network becomes more congested, it has become increasingly important to plan and provide priority measures for buses, including at traffic signals, along bus lanes and through providing fully-segregated busways. • Increased capacity on the existing bus services will be required as more houses are built to cope with demand, otherwise car usage will be the only viable option for most people. There are no deliverable plans to increase capacity bus routes before housing development takes place.</p>	<p>of the plan. The Council recognise the importance of supporting modal shift and the delivery of public transport improvements.</p>
Public Transport 2	<p>A number of comments relate to public transport provision. These include: • Stagecoach state that the policy language within the Plan is</p>	<p>Noted.</p>

Category	Summary	Council Response
	<p>highly focused on providing for car-borne movements first. While improvements to public transport are repeatedly referred to, there is little or no definition of how this will be specified or accomplished, and at least as importantly. • The objective of reducing use of cars though for example improvement of the frequency of buses is also a worthy one. However the argument for this actually happening is not convincing. • West Berkshire District Council supports this policy which appears to fit well with the aspirations for a strategic bus corridor linking Oxford, Didcot, and Science Vale with Newbury. West Berkshire would not wish to see undesirable increases in traffic on unsuitable cross-boundary routes, in particular the A338 south of Wantage and the A417 east of Didcot through Streatley as an alternative to the A34/M4 towards Reading. • Oxford City Council supports this policy. Difficulties in increasing these modes of transport in rural areas points to the need to focus more development close to urban areas and particularly Oxford. • The Plan does not support sustainable public transport enough. It should say that no planning permission should be granted for house building until a firm plan is drawn up to re-open Grove station. Greater emphasis on such schemes - into of road building/improvements would create a better environment. Locating development along the main public transport corridors (such as Premium Bus Routes and close to rail stations) offers the best chance of attracting a high proportion of movement by public transport and thus reducing the number of additional cars which need to be accommodated on the County's road network. As Oxfordshire's road network becomes more congested, it has become increasingly important to plan and provide priority measures for buses, including at traffic signals, along bus lanes and through providing fully-segregated busways. • Increased capacity on the existing bus services will be required as more houses are built to cope with demand, otherwise car usage will be the only viable option for most people. There are no deliverable plans to increase capacity bus routes before housing development takes place.</p>	

Category	Summary	Council Response
Public Transport 3	The allocation is very well positioned in terms of pedestrian and cycle way accessibility to key local facilities. Some off-site highway works may be required to facilitate the implementation of this non-vehicular connectivity.	Noted.
Transport strategy	The comment states that the council has not considered its duty to cooperate with its residents. Measuring 'likely' impacts in an abstract is meaningless. It is the people who experience these problems on a daily basis who should be consulted.	In addition to CP19 which seeks to support the re-opening of a railway station at Grove, significant proposals are referenced to improve facilities and the use of Didcot Station and increasing the capacity of the line between Oxford and Didcot - these matters primarily sit outside of the Local Plan process (Didcot Station is located within South Oxfordshire).
West Berkshire District Council - Transport strategy (1)	South East Vale Area The draft Local Plan shows numerous development sites that are proposed in the vicinity of the A34 corridor, in particular those associated with the growth and development of the Science Vale area. Fig 5.6c shows proposed improvements to the bus network within the Science Vale area, which includes an "At least 4 per hour link to/from Newbury. This would appear to match an aspirational primary bus route linking Newbury/Harwell Campus/Didcot/Oxford which is identified in the recently approved West Berkshire Local Transport Plan Passenger Transport Strategy, and improve connectivity where no such direct passenger transport link currently exists. It should be noted that discussions have taken place in recent years between West Berkshire, Oxfordshire CC and a local bus operator regarding proposals for a similar service as part of the (unsuccessful) West Berkshire bid to the Local Sustainable Transport Fund. This bid highlighted the possibility that following a period of initial pump priming, such a service could become commercially viable within a few years. The large number of development sites identified in the South East Vale area is likely to generate significant additional travel demand on the A34. West Berkshire would not wish to see undesirable increases in traffic on unsuitable cross-boundary routes, in particular the A338 south of Wantage and the A417 east of Didcot through Streatley as an alternative to the A34/M4 towards Reading.	Noted.

Category	Summary	Council Response
West Berkshire District Council - Transport strategy (2)	West Berkshire District Council supports this policy which appears to fit well with the aspirations for a strategic bus corridor linking Oxford, Didcot, and Science Vale with Newbury. A separate comment suggests that the plan makes no consideration of the potential for light rail solutions which offer more sustainable solutions than bus or car.	Noted.

Core Policy 36: Electronic Communications

Category	Summary	Council Response
Electronic communications	The County Council supports the draft policy as it reflects the emerging joint working across all districts to proactively plan for Superfast Broadband connections.	Noted.
Policy wording	Concern is raised that the definition of “appropriate infrastructure” could be used to require developers to provide systems which are simply not within their control or technical capacity to do so. Also concern is raised as to what constitutes “superfast broadband” and how this requirement will be assessed through the planning application process.	The Council considers the policy wording to be sufficiently clear. 'Superfast' broadband is adequately defined and the policy is clear that infrastructure is provided 'sufficient to enable all properties to be connected'

Core Policy 37: Design and Local Distinctiveness

Category	Summary	Council Response
Balance between local circumstances and site specific considerations	Two comments support the need for a high quality design policy however the criteria should be amended to reflect the need that a balance has to be struck between local circumstances and site specific considerations.	Support noted. CP37 sets out a number of principles to ensure high quality design which include responding to the site and its surroundings. The Council's Adopted Design Guide SPD (BHE05-05.3) supports CP37 and sets out in detail key urban design principles to deliver high quality, and well-designed buildings, streets and spaces that are in keeping with their environment, and respond to the local character and distinctiveness of the existing settlement. Section 2 of the Design Guide SPD looks to ensure new development respects, responds to and enhances the unique characteristics of the Vale.
Car Parking Provision	Abingdon Town Council consider adequate car parking provision needs to be provided in developments as households have more vehicles than ever before and unless adequate provision is made there will be increasing parking problems. It is acknowledged this may be more relevant for the Design Guide SPD.	Core Policy 37 states that all new development will be expected to be of high quality design and criterion xi. states all development will need to ensure a sufficient level of well-integrated car and bicycle parking. Furthermore the Policy is supported by the Council's Adopted Design Guide SPD (BHE05-05.3) which sets out principles for car parking standards in accordance with Oxfordshire County Council Car Parking Standards. The Parking Standards Supplementary Planning Guidance also sets out requirements for car parking standards for commercial and residential development.
Coalescence of villages	Watchfield Parish Council note that the Local Plan states that the special character of villages (Shrivenham and Watchfield) should be conserved or enhanced but does not contain any policies for how this is to be achieved or the criteria used for maintenance character. There must be a policy included to eliminate coalescence of villages. The absence of a policy for proportional development of villages shows that the character is unimportant to the Vale.	Core Policy 37 ensure developments respond positively to its surroundings including considering history and reinforcing local identity. Alongside this policy, is also Saved Policy NE10: Urban Fringes and Countryside Gaps as stated in Appendix G of the Plan. This Policy specifically ensures development that would harm important open gaps between settlements will not be permitted.
Core Policy 37 criteria	One comment broadly supports the aims of the Policy however, not all of the requirements will be relevant to all developments (criterion vii) and there are conflicting requirements such as the need to provide convenient access for vehicles along with the need to provide a high quality public realm therefore the policy should set	Support and points noted. The Council consider CP37 sets out the necessary criteria to ensure high quality design is delivered in which the Adopted Design Guide SPD (BHE05-05.3) provides further detail. If there are conflicting criteria on certain schemes, this will be for

Category	Summary	Council Response
	out he criteria as a series of relevant aim to be applied where appropriate.	the applicant to demonstrate and resolve through using CP37 and the Design Guide.
CPRE Design Comments	CPRE acknowledge good words within CP37 however consider that CP37 & CP38 do not give sufficient strength to refuse an application if faced with a large development of a uniform and mediocre standard. CPRE suggest inserting the following text into the preamble to Policy 38: 'The Vale accepts that good design should ensure that larger developments contain a variety of architectural styles and of materials, all of the highest quality, wholly and essentially to avoid mediocrity and uniformity. The Vale is therefore introducing a 'Certificate of Quality' and will employ outside consultants, independent of both applicant and the District Council, to judge if an application for larger developments meets the requisite standards.' Also insert, either as part of Core Policy 38 (Part 3) or as a new Core Policy 38(b): 'The District Council will seek a 'Certificate of Quality' from an expert, independent of the Council and the proposer, to guarantee the quality and variety of building design in larger building developments. No larger development will be approved without such a Certificate.'	Point noted. The Council consider CP37 and CP38 are robust policies that clearly set out what is expected from development to ensure high quality design is achieved. The Adopted Design Guide SPD (BHE05-05.3) supports these policies and provides further detail in ensuring proposals can be appropriately and transparently assessed. As part of the application process, the Council will seek comments from internal urban design officers as to ensure compliance with the Local Plan and the Adopted Design Guide SPD
English Heritage Comments	English Heritage welcome the Council's preparation of a comprehensive design guide and the recognition that quality design and the historic environment are linked. However would like to see the policy strengthened to ensure a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Suggest the opening sentence read "All proposals for new development must be of high quality design that:" Clause i should be amended to read ".....cultural diversity and history, conserves and enhances historic character and reinforces local identity.	Support acknowledged. The Council consider CP37 and CP38 are robust policies that clearly set out what is expected from development to ensure high quality design is achieved. The Adopted Design Guide SPD (BHE05-05.3) supports these policies and provides further detail in ensuring proposals can be appropriately and transparently assessed. The Plan should be read as a whole and thus Core Policy 39 will apply to all development.
Local Character	Development should be in keeping the local character of Abingdon	Core Policy 37 ensures that all new development will be expected to be of high quality design that responds positively to the site and its surroundings, cultural diversity and history and reinforces local

Category	Summary	Council Response
		identity or establishes distinct identity. Furthermore Core Policy 39 requires the Council to work with developers and other key stakeholders to better understand the significance of Conservation Areas in the district through producing and updating Conservation Area Character Appraisals where necessary. At the start of Appendix A, a number of general requirements are set out for all allocations to deliver. This includes a requirements for developers to undertake Conservation Area Appraisals to establish the local character and distinctiveness, and the significance of heritage assets and their settings.
Minimum standards	There should be a general policy requiring minimum standards for accommodation, such as size of rooms. The Local Plan should specify standards for dwellings so that they provide acceptable living accommodation for residents (although it is acknowledged this may be more relevant for inclusion in the Design Guide).	CP37 sets out at criteria viii. that the scale, height, density, grain, massing, type and details should be appropriate. In regards to specific space standards for accommodation, this level of detail is within the Adopted Design Guide under Section 5 'Building Design'. It should also be noted the National Government have published a Housing Standards Review (HOU06) which includes nationally described space standard policy consultation document as part of the review.
Need to maintain rural aesthetic	Need to maintain the rural aesthetic quality alongside a massive programme of house building	Point noted. Core Policy 37 ensures that all new development will be expected to be of high quality design that responds positively to the site and its surroundings, cultural diversity and history and reinforces local identity or establishes distinct identity. CP38 provides further detail to ensure major developments are of a high standard.
Policy Wording (English Heritage Comments)	English Heritage welcome the Council's preparation of a comprehensive design guide and the recognition that quality design and the historic environment are linked. However would like to see the policy strengthened to ensure a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Suggest the opening sentence read "All proposals for new development must be of high quality design that:" Clause i should be amended to read ".....cultural diversity and history,	The Council acknowledges English Heritages comments and will work with English Heritage to ensure the Policy sets out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment.

Category	Summary	Council Response
	conserves and enhances historic character and reinforces local identity.	
Strengthening of policy required	Five comments consider this policy requires strengthening to provide a more robust emphasis on the need for high quality design. It is suggested the opening sentence of the policy should be amended to include 'must be of high quality design' and also suggested the policy should include a requirement for community engagement on major applications.	The Council consider CP37 and CP38 are robust policies that clearly set out what is expected from development to ensure high quality design is achieved. The Adopted Design Guide SPD (BHE05-05.3) supports these policies and provides further detail in ensuring proposals can be appropriately and transparently assessed. CP38 relates to major development and includes criterion to ensure proposals demonstrate community engagement.
Supports CP37	Three comments support the policy in particular two comments consider the approach in Core Policies 24, 37 and 38 provide a coherent framework to bring forward development which respects local circumstances and one comment states the policy is in accordance with national guidance and addresses the need to connect people with places and take into account the natural, built and historic environment.	Support acknowledged

Core Policy 38: Design Strategies for Strategic and Major Development Sites

Category	Summary	Council Response
Community engagement	Four comments state the policy should give a higher profile to engaging communities in the design process, in particular two these comments also consider that the Masterplan part of the policy should include an extra bullet point stating “consult widely with the community on both the concept and the design and its implication for local people”.	The Council consider the Plan and supporting documents clearly set out the need for community engagement. Core Policy 38 states housing allocation and major development sites must be accompanied by a site-wide design strategy that includes a Design and Access Statement. This Statement will need to explain how consultation with the existing community has been incorporated. The Council's Adopted Design Guide SPD (BHE05-05.3) sets out further information on Community consultation, and expresses the need for developers to engage widely with the community as indicated in the Vale's Statement of Community Engagement 2009 (OCD01).
Concerns regarding CP38	Four comments have raised concerns regarding CP38 relating to a number of matters including; the requirements of a vision is not achievable because a vision comprises of a number of elements, all of which cannot be translated into a single masterplan, a better alternative is to seek the provision of a Vision Statement; requiring an indicative layout is not appropriate at the scale of a major development site and the wording of this requirement is at odds with other Statutory Instruments governing the level of detail required for outline planning applications because it places a higher burden on applicants than what is required by other Regulations; the requirements are not necessary or appropriate for a design and access statement, especially in the case of outline applications; the Sustainability Assessment Report should also include standards for water use, and SUDS, amongst other aspects and maintenance costs of SUDS is mentioned in the Plan or in the sustainability assessment and this should be taken into account in the viability of individual sites; the Plan still appears developer-led and, if implemented, will adversely affect existing and future residents of the Vale; the importance of the qualities and characteristics being protected in the vale is not backed up by any definite proposals for how this is to be achieved; there are no commitments to ensuring that houses are built to the highest sustainability standards; and the	The Council considers CP37 and CP38 supported by the Adopted Design Guide SPD (BHE05-05.3) set out how high quality design will be achieved. The Plan and these policies are consistent with national policy. The overall aim of CP37 and CP38 and the Adopted Design Guide SPD is to ensure a high quality design is delivered thus the criterion included in CP38 is considered necessary to achieve this, including identification of a vision. The Plan as a whole recognises the Vale is in a water stressed area and are continuing to work with the Environment Agency and Thames Water on this matter. SUDS is adequately addressed in CP42 with further detail in the Infrastructure Delivery Plan (DLP07). The Council considers CP40 sets out appropriate guidance to ensure development is designed to incorporate climate change adaptation and design measures in particular in reflecting the National Government's Housing Standards Review (HOU06). In regards to addressing renewable and low carbon energy sources, further detail will be addressed within Local Plan 2031 Part 2 as identified within the Responding to Climate Change Topic Paper 7 (TOP07).

Category	Summary	Council Response
	opportunity has not been taken to insist on green technology options as standard	
English Heritage Comment	English Heritage welcome the 4th bullet point however would like to see the policy strengthened to ensure a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment through suggesting that a new bullet point; “conserve and enhance the historic environment, including the retention and incorporation into the scheme of buildings and other features of historic interest”, should be added to Core Policy 38.	The Council acknowledges English Heritages comments and will work with English Heritage to ensure the Policy sets out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. The Plan should be read as a whole and thus Core Policy 39 will apply to all development.
Housing density	1 respondent observes that the Design Guide states that a minimum density of 30 dwellings per hectare should be achieved. Such a density should be restricted to the central areas of new developments because it would inappropriate in certain areas. No mention at all of providing bungalows. MOVE TO HOUSING DENSITY?	CP23 'Housing Density' sets out a minimum density of 30 dph to ensure land is efficiently used throughout the district. Alongside this, the policy also enables differing densities to be provided to reflect local circumstances and encourages higher densities in appropriate locations
Opportunities for sustainable transport	Stagecoach considers the policy for urban design ignores the role of design in facilitating the rebalancing of transport towards more sustainable modes. If this is not achieved, buses take over 20 minutes to travel from one end of a scheme to the other, within which time, even at peak times, a motorist is on the strategic network and a good way toward their local destination. This risks being the outcome within Science Vale, without consistent strong urban design “rules” that structure place-making around high-quality public transport arteries and the delivery of any meaningful network enhancement is likely to be practically closed off before a single new home is built on the schemes in question. To make the Policy CP38 effective strengthen Policies CP18 and CP35 and CP38 could be amended to read: “... Integrate with surrounding historic, built and natural environments, in particular maximising existing and potential movement connections, and accessibility, to encourage and facilitate the greatest possible use of walking, cycling and public transport, including measures to structure development where appropriate to facilitate delivery of efficient and	Points noted. The Council considers CP37 and CP38 supported by the Adopted Design Guide SPD (BHE05-05.3) provide sufficient strength to ensure proposals facilitate the delivery of more sustainable modes of transport. CP37 and CP38 include promoting sustainable modes over vehicular movements and ensuring vehicular movements do not dominate. The Adopted Design Guide SPD within Section 3 'Establishing the Structure' there is a principle on reducing reliance on the car and encourage bus routing through the new development.

Category	Summary	Council Response
	direct public transport routes, incorporating full segregation of bus movements from general traffic where appropriate.”	
Support CP38	Three comments support CP38, in particular two comments consider the approach in Core Policies 24, 37 and 38 provide a coherent framework to bring forward development which respects local circumstances and one comment supports the approach of requiring a Masterplan to ensure an integrated approach with all aspects of sustainable development.	Support acknowledged

Core Policy 39: The Historic Environment

Category	Summary	Council Response
Archaeology	Oxfordshire County Council has no significant objections or concerns as CP39 is acceptable although fairly basic which will be expanded on in Part 2. It should be noted that on two transport schemes (Abingdon Southern by pass and Science Vale Thames Crossing) the land for safeguarding includes scheduled ancient monuments.	Points noted. Alongside CP39, Saved Policies HE9, HE10, and HE11 will apply in regards to archaeology.
English Heritage Comments	English Heritage made eight comments regarding CP39 and state the attractive historic environment is one of the reasons people want to visit and work in the District. Overall English Heritage welcomes and supports CP39 however they consider that the Plan requires additional references throughout the Plan which comments have been submitted on as to ensure the Plan has a “positive” strategy for the conservation and enjoyment of, and a “clear” strategy for the enhancement of, the historic environment. English Heritage also welcome paragraphs 6.90, 6.93, 6.94, 6.95, 6.96-98, however they would like to propose three modifications: at paragraph 6.94 the Plan should indicate that there are five existing Character Appraisals and how they have been used to inform the policies and proposals of the Plan; paragraph 6.93 could be more detailed on what assets are currently at risk and what may be at risk in the future; and reference in 6.90 to non-designated heritage assets which are important features to local communities and provide a sense of place, community identity and local history.	The Council acknowledges English Heritages support and comments and will work with English Heritage to ensure the Policy sets out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. However the Plan does not need to mention every heritage detail or repeat matters already covered by the NPPF/NPPG
Object to CP39	Five objectors to CP39 in relation to; the plan has failed to exclude areas of heritage sensitivity from development; the plan has not applied heritage policy correctly and in particular has not given due weight to the LPAs’ special statutory duty - under the 1990 planning (listed buildings and conservation areas) act - to give “considerable weight” to the desirability of preserving or enhancing the setting, character and appearance of listed buildings and conservation areas situated in and adjacent to the sites selected and thus policies HE1, HE2	The Council consider the Plan and CP39 provides for conservation and enhancement of heritage assets in accordance with national policy. Alongside CP39, Saved Policies HE1, HE4, HE5 and HE7 will still apply for the Historic Environment which will be reviewed through Local Plan 2031 Part 2. The Council consider Saved Policy NE8 provides the policy context for Oxford landscape setting however the Local Plan 2031 Part 2 will consider an update to the saved policy.

Category	Summary	Council Response
	and HE3 should be carried forward; and Oxford City Council object as there is no reference to Oxford skyline as a heritage asset.	
Policy Objectives	Two respondents identify a need to ensure that the level of influence exerted by heritage assets on the layout of development proposals is proportionate and evidence based.	Point noted. The Council consider CP39 provides appropriate level of conservation and enhancement of heritage assets along with Saved Policies for the Historic Environment. As set out within CP39 the Council will work with landowners, developers, English Heritage and other stakeholder to ensure new development conserves heritage assets and their setting. The Council acknowledges some of the Conservation Area Character Appraisals are out of date and thus the Council are currently updating these.
Saved policies	The draft plan does not carry forward heritage\age policies HE1, HE2 and HE3 which give valuable guidance on how statutory heritage duties will be applied	Alongside CP39, Saved Policy HE1 will still apply until reviewed by Local Plan 2031 Part 2. The Council consider these policies provide sufficient guidance on this matter.
Strengthening of Policy	Five respondents consider CP39 could be strengthened to give it more weight as follows; changes should be made to CP39 (i) omit 'and where possible', new (v) add (at end) ", engaging the local community in this process." and (vi) Add "and protecting" after "assessing"; and suggest the following additions a) add "architects and designers" in the first sentence b) stuck with: i) encourage the building and development of the historic Houses and Monuments of the future which will add lustre interest and beauty to the Vale.	Point noted. The Council consider CP39 provides appropriate level of conservation and enhancement of heritage assets along with Saved Policies for the Historic Environment. The Council will continue to work with English Heritage on these matters to ensure a positive strategy for the enjoyment and conservation of heritage assets.

Core Policy 40: Sustainable Design and Construction

Category	Summary	Council Response
Building Performance	Core Policy 40 The requirements of the policy are onerous and not in accordance with national guidance. Matters relating to building performance are best suited to be addressed through the Building Regulations process. In terms of the need to orientate habitable rooms within 30 degrees of south, this will not be possible on all development sites for all units proposed and the need to demonstrate that it is not appropriate to do so places an unnecessary burden on developers, especially where the layout of a site and its physical characteristics are the key in addressing this issue.	The Council consider CP40 is in accordance with national policy. The supporting text acknowledges the recent Housing Standards Review (HOU06) which proposes to put less emphasis on code for sustainable homes and include matters relating to building performance and energy efficiency in amended Building Regulations in which the Policy reflects. In regards to the measures included in the policy, it states 'Wherever practical' these measures should be provided.
Carbon Reduction	The Plan does not include a strategy which seeks to meet objectively assessed requirements of the Climate Change Act and the related carbon reduction budgets.	The Council considers CP40 sets out appropriate guidance to ensure development is designed to incorporate climate change adaptation and design measures and the Plan as a whole addresses climate change appropriately. In regards to addressing renewable and low carbon energy further, detail will be addressed within Local Plan 2031 Part 2 as identified within the Responding to Climate Change Topic Paper 7 (TOP07).
English Heritage Comments	English Heritage welcomes CP40 however suggest, for clarity, the penultimate sentence of the Policy should read “where historic assets would be adversely affected”.	The Council acknowledges English Heritage's comments and will work with English Heritage to ensure the Plan sets out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment.
Environment Agency Comment	Environment Agency note a Water Cycle Study has been undertaken which recognises the Vale is in a water stressed area which is reflected in the Plan and indicates a higher level of water efficiency standard will be formalised within Local Plan 2031 Part 2, at a later date. The Environment Agency consider when taking account of the above evidence base, this policy is not justified, in so far as it does not reflect the evidence base documents of the Plan. Given the Local Plan Part 1 will allocate a significant proportion of the growth within the district, and development may come forward prior to the adoption of the Local Plan Part 2. There will be no mechanism to deliver such water efficiency measures in this	The Council acknowledges Environment Agency's comments. The Council have subsequently been engaging cooperatively with the Agency to agree a way forward in the light of the Housing Standards Review

Category	Summary	Council Response
	scenario. Therefore suggest revised policy wording to ensure higher water efficiency standards are delivered within the strategic growth allocated, the following inclusions: vii New developments shall be designed to a water efficiency standard of 105 litres/head/day (l/h/d) for new homes, and BREEAM (BRE Environmental Assessment Method) 'Excellent' with a maximum number of 'water credits' or equivalent.	
Fracking	1 respondent is opposed to fracking	Point noted
Incorporation of Design Guide	1 respondent considers that the policy could incorporate measures from the Design Guide and include a reference to the Guide as follows after the first sentence 'that new development and re-development should take full account of the measures described in Section 7 of the Design Guide'.	Point acknowledged. The Plan should be read as a whole in which the supporting text for CP37 and CP38 explains the Adopted Design Guide will apply to all development in the District.
Object to CP40	Around 2 respondents consider the requirements of the policy to be onerous, not in accordance with national guidance.	The Council consider CP40 is in accordance with national policy. The supporting text acknowledges the Housing Standards Review (HOU06) which proposes to put less emphasis on code for sustainable homes and include matters relating to building performance and energy efficiency in amended Building Regulations. Therefore the policy does not include standards for Code for Sustainable Homes.
Renewable energy requirements	Around 4 comments regarding renewable energy requirements, relating to; lack of commitment to measure energy targets in which targets should be included in Chapter 6 regarding zero carbon homes; and the need for all new dwellings to be more sustainable and have renewable energy sources.	Points noted. In regards to addressing renewable and low carbon energy sources, further detail will be addressed within Local Plan 2031 Part 2 as identified within the Responding to Climate Change Topic Paper 7 (TOP07). The Council considers CP40 sets out appropriate guidance to ensure development is designed to incorporate climate change adaptation and design measures in particular in reflecting the National Government's Housing Standards Review (HOU06). All policies including CP40 will be monitored which is demonstrated within Appendix H of the Plan.
Sewerage System	Abingdon Town Council consider there to be a need to update the map of the sewerage system in Abingdon	Point noted.

Core Policy 41: Renewable Energy

Category	Summary	Council Response
Concerns regarding CP41	Around 3 respondents raised concerns regarding CP41 relating to; the Council should make a commitment to support community renewable energy schemes; include a requirement in policy for new homes to be designed for maximum energy efficiency and needs for proactive plan to increase renewable and low-carbon generation	The Council consider CP41 encourages all schemes for renewable and low carbon energy including community based schemes. However further detailed policies on this matter may be considered within Local Plan 2031 Part 2 as identified within Responding to Climate Change Topic Paper 7 (TOP07). CP40 addresses sustainable construction and design of homes however it should be noted National Government have published a Housing Standards Review (HOU06) which proposes to incorporate energy efficiency standards into Building Regulations.
Support CP41	English Heritage and Oxfordshire County Council support policy Core Policy 41.	The Council welcomes English Heritage and Oxfordshire County Council's support for Core Policy 41 in particular clauses i and iii

Core Policy 42: Flood Risk

Category	Summary	Council Response
Environment Agency Comments	The Environment Agency have made two comments regarding CP42, relating to; they have requested the inclusion of a Core Policy within the Plan to safeguard land to prevent development from precluding the delivery of flood risk management measures; and point out that a Water Cycle Study is currently being undertaken but it has yet to be completed. Until the WCS is finalised concerns about effectiveness and consistency with the national planning policy (raised in the EA's letters dated May 2013 and April 2014) are still applicable.	The Council acknowledges Environment Agency's comments. The Council have subsequently been engaging with the Agency on such matters and are positively working together to resolve these issues.
Flood risk - East Hanney	4 respondents believe development of the site in East Hanney would increase the existing level of flood risk and that the Council should reconsider their site selections accordingly.	The Council has carried out a Strategic Flood Risk Assessment (SFRA) to inform the testing and assessment of strategic site allocations in the Local Plan. Regarding the proposed allocation South of East Hanney the SFRA recommends that a drainage strategy be submitted to cover off mitigation of any surface water risk. Appendix A Site Development Templates requires developers to carry out a site specific Flood Risk Assessment to support a planning application. The proposed allocation at East Hanney will require SUDs to drain the surface water from the development.
Flood risk - north west of Abingdon	Abingdon Town Council consider that development of land north west of Abingdon would mean that a proper drainage and flood alleviation scheme for this area would be essential.	The Council has undertaken a Strategic Flood Risk Assessment (SFRA) (WWF02 and WWF03-03.18) to inform the testing and assessment of strategic site allocations. Regarding the proposed allocation North-West of Abingdon-on-Thames the SFRA recommends that a drainage strategy be submitted to cover any mitigation of surface water risk and reduce impact downstream through site design and SUDs. Appendix A of the Plan sets out a Site Development Template for this site (pgs. 7-8) stating development will be required to carry out a site specific Flood Risk Assessment to support a planning application, and identify any measures to mitigate the impact of further flooding on the proposed allocation.
General Comments	3 respondents have raised concerns regarding CP42, relating to; the Vale is vulnerable to flooding, therefore reassess likely growth and housing	The Council have published a Strategic Flood Risk Assessment Addendum, October 2014 (WWF02) which takes into account the

Category	Summary	Council Response
	need; there should be acknowledgement and reference to the proposed Western Flood Channel; and have river basin management plans, water resource plans and flood risk management plans been considered?	additional strategic site allocations reflecting the level of housing need in the SHMA. The SFRA also takes into account policy changes and legislation including river basin management plans and water resource plans which has informed the Plan. Regarding the allocation at Sutton Courtenay developers would be required to undertake a site specific Flood Risk Assessment to demonstrate mitigating further impact on the site for flooding as set out in Appendix A in the Site Development Template for East of Sutton Courtenay (PGS 21-22). The Environment Agency are exploring options to improve the flood flow capacity through the western floodplain of Oxford with a conveyance channel, however this has not yet been approved or designed.
Object to CP42	2 respondents have objected to the policy stating flood risk is not adequately addressed; and the Infrastructure Delivery Plan (IDP) makes no provision for the life-long maintenance costs of SUDS within the significant number of development sites proposed. These are not one-off costs associated with the build process but material long-term revenue costs of drainage infrastructure. Without proper maintenance of SUDS within the development sites proposed, research suggests that those drainage systems may prove unfit for purpose or fail, with increased risk of flooding. The IDP should be revised to ensure that adequate Section 106 monies are allocated as a matter of priority to the long term maintenance of SUDS.	The Council considers the Plan as a whole adequately addresses flood risk in particular through CP42 and is supported by a Strategic Flood Risk Assessment (SFRA) (WWF02 and WWF03-03.18) that has inform the testing, assessment and selection of strategic site allocations in the Local Plan. The IDP (DLP07) does make provision for SUDS and drainage infrastructure over the Plan period (pg. 68) and states these will be delivered directly by the development or through specific contributions. The cost of this infrastructure will be determined through the planning application on a site by site basis.

Core Policy 43: Natural Resources

Category	Summary	Council Response
Agricultural land	3 respondents object to criterion viii of the policy as it could be used to support a sequential approach to the development of sites.	Core Policy 43, criteria viii is in conformity with the NPPF, para 112 which states 'where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'
Air pollution	3 respondents consider that further development in Abingdon will increase traffic flow and air pollution in Abingdon town centre (which is a designated AQMA) and a more robust approach needs to be taken to air quality issues (including enhanced monitoring) which is not limited to the Air Quality Management Areas.	Points noted. CP43 sets out a requirement for proposals to have regard to air quality and Air Quality Management Areas in the District.
Minerals and Waste	Oxfordshire County Council consider that the text within Paragraph 6.107 is not aligned to its strategy for Minerals and Waste and should be amended accordingly and consider that the policy should also refer to composting in addition to recycling.	The Council acknowledges Oxfordshire County Council's comment and agree the text needs amending to align with the Minerals and Waste Strategy. This can be seen in the Council's 'Schedule of Proposed Minor Changes' (DLP11)
Object to CP43	1 respondent suggests a new additional Core Policy relating to 'Farming' which recognises the vital importance of farming in the Vale in the context of development proposals.	Point noted. The NPPF supports the diversification of farming and CP43 aims to direct development away from the best and most versatile agricultural land. It is therefore considered a separate policy for farming is not required or justified.

Core Policy 44: Landscape

Category	Summary	Council Response
Add AONB Policy and Exclude development from AONB	Three comments have suggested either a new policy be introduced on just AONB or additional paragraph in policy. AONBs have a great level of protection against development and thus those allocations in the AONB should be removed from the Plan. Also CP44 does not make sufficient cross reference to the statutory North Wessex Downs AONB Management Plan and the implications of Paragraphs 115 and 116 of the NPPF in respect of development within the AONB	The Council consider the conservation and enhancement of the AONB is sufficiently addressed within CP44 and Saved Policy NE6 in accordance with the NPPF which is demonstrated in the Natural Environment Topic Paper 9 (TOP09). Harwell Campus is unique with national and international significance and potential in high technology sectors, supported by Enterprise Zone status recently extended to 2018. It has significant economic and employment growth potential, as identified in Economic Forecasting to inform the Oxfordshire SEP and SHMA (ECO02). To achieve this potential sufficient housing is required in appropriate and sustainable locations. Together this presents exceptional circumstances that justify development in AONB in accordance with NPPF para 115-116, having assessed all reasonable alternative sites. All potentially reasonable alternative sites have been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of the AONB including consideration of Landscape Studies (NAT04.1-04.12) in particular the East Harwell Landscape and Visual Impact Assessment (NAT04.1). The outcomes of which have been reflected in the size and capacity of the allocations and within the Site Development Templates in Appendix A of the Plan.
AONB General Comment (1)	One comment states there is a failure to protect areas of outstanding natural beauty.	The Council consider the conservation and enhancement of the AONB is sufficiently addressed within CP44 and Saved Policy NE6 in accordance with the NPPF as demonstrated within the Natural Environment Topic Paper 9 (TOP09). CP44 does set out that high priority will be given to the conservation and enhancement of the AONB. The implementation of this policy will be monitored as set out in Appendix H of the Plan.
AONB General Comment (2)	One comment expressed the view that planning decisions have paid scant regard to the high priority will be given to the conservation and	CP44 does set out that high priority will be given to the conservation and enhancement of the AONB. The implementation

Category	Summary	Council Response
	enhancement of the natural beauty of the North Wessex Downs AONB.	of this policy will be monitored as set out in Appendix H of the Plan.
AONB General Comment (3)	One comment has suggested amendments to the policy; the first and fourth paragraphs should read "AONBS are what they state: Areas of Outstanding Natural Beauty. any attempts to introduce into them artificial buildings is a contradiction in terms and will under no circumstances (except in the case of a national emergency) be permitted and in section b the second paragraph and subsections vii and viii should be terminated	The Council consider the conservation and enhancement of the AONB is sufficiently addressed within CP44 and Saved Policy NE6 in accordance with the NPPF as demonstrated within the Natural Environment Topic Paper 9 (TOP09) and thus the suggested amendments are not required.
Blanket Approach Landscape Policy	Two comments have stated the Policy is contrary to national guidance by virtue of the fact that it seeks to protect the "landscape" of the district from harmful development whereas the NPPF requires a criteria based policies and not a blanket approach.	The Council considers the Plan as a whole seeks to conserve and enhance the landscape in the District, with a specific policy CP44. CP44 is consistent with the NPPF and does not set a blanket approach to landscape and recognises that high priority will be given to the AONB. This is explained further in the Natural Environment Topic Paper 9 (TOP09).
Coalescence of Harwell with Didcot	Around two comments have suggested the need for the character of the countryside and villages to be maintained will not be achieved at Harwell which will coalesce with Didcot.	This is covered by saved policy NE10 which addresses urban fringes and countryside gaps. Also the relevant Site Development Templates in Appendix A of the Plan address coalescence between Harwell and Valley Park.
Environmental Impact of Proposals	Two comments stating little consideration of the environmental impacts of the proposals and thus sites from the greenbelt should be dropped and should concentrate on brownfield sites.	All sites have been robustly assessed including landscape, environmental and greenbelt considerations as demonstrated within the Strategic Sites Selection Topic Paper 3 (TOP03) which has been informed by the Local Green Belt Review (NAT02 and NAT03).
Exclude development from AONB	Around 51 comments have pointed out that the plan allocates a further 1,400 homes in the North Wessex Downs AONB (the largest strategic housing allocation within any National Park or AONB in the whole of the UK). There is no exceptional need to build in the North Wessex Downs AONB. It is not in accordance with paragraphs 115 and 116 of the NPPF. The allocation of sites is contrary to paragraph 6.111 of the Local Plan. Reallocate sites accordingly and remove the area within the AONB from the ring fenced area.	The Council consider the conservation and enhancement of the AONB is sufficiently addressed within CP44 and Saved Policy NE6 in accordance with the NPPF which is demonstrated in the Natural Environment Topic Paper 9 (TOP09). Harwell Campus is unique with national and international significance and potential in high technology sectors, supported by Enterprise Zone status recently extended to 2018. It has significant economic and employment growth potential, as identified in Economic Forecasting to inform

Category	Summary	Council Response
		the Oxfordshire SEP and SHMA (ECO02). To achieve this potential sufficient housing is required in appropriate and sustainable locations. Together this presents exceptional circumstances that justify development in AONB in accordance with NPPF para 115-116, having assessed all reasonable alternative sites. All potentially reasonable alternative sites have been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of the AONB. The selection of sites have been informed by Landscape Studies (NAT04.1-04.12) in particular the East Harwell Landscape and Visual Impact Assessment (NAT04.1). The outcomes of which have been reflected in the size and capacity of the allocations and within the Site Development Templates in Appendix A of the Plan.
Exclude development from AONB and level of protection of AONB	Around 5 comments have referred to North Wessex Downs AONB having a greater level of protection against development than the Oxford Green Belt and allocations in the AONB accordingly should be removed.	The Council considers the Plan and Saved Policies give appropriate protection to the AONB and the Green Belt in accordance with the NPPF as demonstrated within the Natural Environment Topic Paper 9 (TOP09). All sites have been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of landscape, green belt, environmental and the AONB.
Exclude development from AONB and Green Belt	Around 43 comments have expressed they would like the allocated sites within the AONB and greenbelt to be removed. A number of comments state the Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB). These allocations threaten to undermine the rural character of the Vale. There is no evidence to demonstrate exceptional circumstances, or that the allocations in the AONB are in the public interest. They note that, according to the Strategic Sites Summary Table produced by the consultants commissioned to carry out sustainability appraisals of potential sites for new housing, no "significant weighting" is applied to sites within the AONB and that therefore sites should be reallocated. At Harwell Campus, limit	The District's objectively assessed housing need has been robustly assessed within the SHMA (HOU01-01.3) which provides an up-to-date and objective assessment of housing need prepared in full in accordance with the NPPF and NPPG. The Council considers the conservation and enhancement of the AONB and Green Belt is sufficiently addressed through CP44, Saved Policy NE6 and CP13 in accordance with the NPPF as demonstrated in the Natural Environment Topic Paper 9 (TOP9). All sites have been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of the AONB and the Green Belt. The selection of sites have been informed by the Local Green Belt Review (NAT02 and NAT03) and Landscape Studies (NAT04.1-04.12) in particular the East Harwell Landscape and

Category	Summary	Council Response
	development to the north end within the existing campus, and remove the extension into greenfield land in East Hendred Parish (275 houses).	Visual Impact Assessment (NAT04.1) and North Abingdon Landscape and Visual Feasibility Study (NAT05). These studies inform both proposed Green Belt boundary change and landscape impact mitigation measures which have been reflected in the selection, size, capacity and policy requirements for the proposed housing allocations as set out in the Site Development Templates in Appendix 1 of the Plan. Harwell Campus is unique with national and international significance and potential in high technology sectors, supported by Enterprise Zone status recently extended to 2018. It has significant economic and employment growth potential, as identified in Economic Forecasting to inform the Oxfordshire SEP and SHMA (ECO02). To achieve this potential sufficient housing is required in appropriate and sustainable locations. Together this presents exceptional circumstances that justify development in AONB in accordance with NPPF para 115-116, having assessed all reasonable alternative sites.
Exclude development from AONB	Around 51 comments have pointed out that the plan allocates a further 1,400 homes in the North Wessex Downs AONB (the largest strategic housing allocation within any National Park or AONB in the whole of the UK). There is no exceptional need to build in the North Wessex Downs AONB. It is not in accordance with paragraphs 115 and 116 of the NPPF. The allocation of sites is contrary to paragraph 6.111 of the Local Plan. Reallocate sites accordingly and remove the area within the AONB from the ring fenced area.	The Council consider the conservation and enhancement of the AONB is sufficiently addressed within CP44 and Saved Policy NE6 in accordance with the NPPF which is demonstrated in the Natural Environment Topic Paper 9 (TOP09). Harwell Campus is unique with national and international significance and potential in high technology sectors, supported by Enterprise Zone status recently extended to 2018. It has significant economic and employment growth potential, as identified in Economic Forecasting to inform the Oxfordshire SEP and SHMA (ECO02). To achieve this potential sufficient housing is required in appropriate and sustainable locations. Together this presents exceptional circumstances that justify development in AONB in accordance with NPPF para 115-116, having assessed all reasonable alternative sites. All potentially reasonable alternative sites have been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of the AONB. The selection of sites have been informed by Landscape Studies

Category	Summary	Council Response
		(NAT04.1-04.12) in particular the East Harwell Landscape and Visual Impact Assessment (NAT04.1). The outcomes of which have been reflected in the size and capacity of the allocations and within the Site Development Templates in Appendix A of the Plan.
Exclude development from the Greenbelt	One comments states the Green Belt should be protected at all costs in its entirety and not nibbled away at.	The Council considers the protection and conservation of the Green Belt is sufficiently addressed in CP13 as demonstrated in the Natural Environment Topic Paper (TOP09) and informed by the Local Green Belt Review (NAT02 and NAT03).
Flexibility to enable local housing provision	One comment considers that the Policy should both protect the AONB but also allow sufficient flexibility for local housing and other needs of settlements to be met.	The Council acknowledge this point.
Green setting of Oxford	Around 4 comments state that CP44 should make reference to protecting the green setting of Oxford and the importance of protecting views into and out of the city.	The Council consider Saved Policy NE8 provides the policy context for Oxford landscape setting however the Local Plan 2031 Part 2 will consider an update to the saved policy.
Impact on Landscape from the East Harwell Site	Around 24 comments state that the site allocated for residential development at East Harwell falls entirely within the AONB and it is a high value landscape of high sensitivity. Consequently, it does not comply with the stated aims of the AONB, AONB guidance and policy, or Vale of White Horse Core Policy 44 relating to the protection of the AONB. Overall, the landscape impact of the proposed development will be negative. In landscape terms, the potential residential development of East Harwell will have significant and irreversible negative impacts. This conclusion is commensurate with the findings of the Vale of White Horse District Council Landscape Capacity Study. Reallocate sites accordingly.	This site has been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of the AONB. The selection of sites have been informed by Landscape Studies (NAT04.1-04.12) in particular the East Harwell Landscape and Visual Impact Assessment (NAT04.1). The outcomes of which have been reflected in the size and capacity of the allocation and within the Site Development Templates in Appendix A of the Plan. Harwell Campus is unique with national and international significance and potential in high technology sectors, supported by Enterprise Zone status recently extended to 2018. It has significant economic and employment growth potential, as identified in Economic Forecasting to inform the Oxfordshire SEP and SHMA (ECO02). To achieve this potential sufficient housing is required in appropriate and sustainable locations. Together this presents exceptional circumstances that justify development in AONB in accordance with NPPF para 115-116, having assessed all reasonable alternative sites.

Category	Summary	Council Response
Maintaining village character of Harwell	Around 13 comments state there is no effective mechanisms to deliver the stated aim that: "The countryside and villages will have maintained their distinctive character. The Larger Villages will have retained their separate identities...". Saved policy NE10 should be updated to reflect the reality of the Valley Park allocation, and the proposals map should be extended to provide protection to Harwell Village. Add "to mitigate against the coalescence of Harwell Village with Valley Park, a green wedge should be introduced east of the A34."	The Council consider Saved Policy NE10 sufficiently addresses urban fringes and countryside gaps and will help to maintain distinctive character. Also the relevant Site Development Templates addresses coalescence between Harwell and Valley Park.
North Abingdon Site	Around 4 comments regarding landscape impact at the North Abingdon Site. One comment points out that the masterplan for North Abingdon will take into account the requirements of CP44 and findings of the landscape capacity work and will be supported by a Landscape and Visual Impact Assessment (LVIA). The other three comments are concerned this site will be urban sprawl into Green Belt land which is progressively destroying Abingdon's unique character, and views from the high land to the north of the town.	The Council considers the Plan and its policies give appropriate protection to the Green Belt in accordance with the NPPF as demonstrated within the Natural Environment Topic Paper 9 (TOP09) and all development will need to take account of these policies. All sites have been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of landscape, green belt, environmental and the AONB. The Site Development Templates provide specific infrastructure and development requirements for individual sites. For North Abingdon, there are a number of landscape considerations set out including limiting development in accordance with the Landscape Studies.
Oxford Views Study	English Heritage and the Oxford Preservation Trust share the view that the Plan should include reference to Oxford and the importance of its views and landscape setting which had previously be included as saved Policy NE8 and that three of the identified views in the Oxford Views Study are from viewpoints within the Vale (Raleigh Park/Harcourt Hill, Boars Hill and Hinksey Hill A34 Interchange) although it is recognised that this might be more appropriate for a more detailed landscape/views policy in the Local Plan Part 2	The Council consider Saved Policy NE8 provides the policy context for Oxford landscape setting however the Local Plan 2031 Part 2 will consider an update to the saved policy.
Policy to protect important areas of greenspace	Coalescence of Villages There needs to be a policy included 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 which is now only divided by a green strip of land which	This is covered by saved policy NE10 which addresses urban fringes and countryside gaps. Also the relevant Site Development Templates in Appendix A of the Plan address coalescence.

Category	Summary	Council Response
	houses a golf course. There are other villages in the Vale which will see their borders expand as a result of your housing policies and they will also need this protection in the future.	
South East of Hanney Site	One comments stated the proposal to build a new housing development South East of Hanney will be on an ancient ridge and furrow site and therefore present a negative impact on the natural environment.	All sites have been robustly assessed as set out in the Strategic Sites Selection Topic Paper 3 (TOP03) which demonstrates consideration of landscape. The Site Development Templates provide specific infrastructure and development requirements for individual sites. For South East of Hanney, there are a number of landscape considerations.
Statutory Requirements of AONB	Around 5 comments highlight the statutory duty of having regard to the North Wessex Downs AONB and the provisions within the NPPF that "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest"	The Council consider the conservation and enhancement of the AONB is sufficiently addressed within CP44 and Saved Policy NE6 in accordance with the NPPF which is demonstrated in the Natural Environment Topic Paper 9 (TOP09).

Core Policy 45: Green Infrastructure

Category	Summary	Council Response
Green Infrastructure Audit/Strategy	4 respondents have raised concerns regarding the evidence base supporting this policy, in particular 1 respondent states there is a lack of evidence, rigour, urgency and the ANGst model has not informed the proposed sites; and 2 respondents have pointed out that the joint Green Infrastructure Strategy document has yet to be produced, and question the role and function of the Green Infrastructure Audit in the Plan's preparation as, whilst the standards set out are obtained from Natural England, these are not necessarily relevant to the District because the pattern of accessible natural green space is fractured across the district. The concern is that this audit represents an unachievable set of requirements for development sites. The Plan cannot require development proposals to improve assets, which do not relate to those proposals.	Points acknowledged. The Council consider CP45 is based on appropriate evidence in which the emerging Green Infrastructure Strategy will support. The Natural Environment Topic Paper 9 (TOP09) sets out the evidence base and includes details on the ANGst standards. The Green Infrastructure Audit has been used to inform the Green Infrastructure Strategy to help identify important assets, gaps in the network and investment opportunities.
Impact on wildlife from North of Abingdon Site	8 respondents object to development at North Abingdon in the greenbelt due to the associated loss of wildlife habitats and adverse impact on neighbouring Black's Wood Ancient Woodland and the Sugworth SSSI.	The proposed strategic sites are supported by a robust site selection process as demonstrated within the Strategic Sites Selection Topic Paper 3 (TOP03) which includes consideration of the environment and wildlife. Appendix A of the Plan includes Site Development Template for the proposed North Abingdon allocation (pgs. 9-10) setting out a number of site specific development and infrastructure requirements. This includes a number of landscape considerations including that development reflects the outcome of the Landscape Study and Visual Impact Assessment (NAT04 - 06.3).
Natural England Comments	Natural England point out that the Oxfordshire authorities are undertaking more detailed studies to investigate air quality within the Oxford Meadows SAC adjacent to the A34 and A40, which will in turn inform specific mitigation interventions. They advise that the Council seeks to reconcile the Habitats Regulations Assessment of the plan with that of Cherwell which assessed the growth and found that none of the policies present in the draft plan would	AECOM consultants prepared the HRA Report on behalf of the Council. The Council in collaboration with AECOM discussed the conclusion of the HRA Report. It was considered the Vale HRA conclusions are appropriate and minor wording changes have been incorporated into the conclusion. In addition to this, further monitoring indicators have been included in Appendix H of the Plan to ensure that the levels of NOx concentration are monitored in the future. This can be seen in the Council's 'Schedule of Proposed Minor Changes' (DLP11).

Category	Summary	Council Response
	lead to likely significant effects on Oxford Meadows SAC, alone or in combination with others.	
Support CP45 (1)	Support Policy 45 as there is a requirement for all new development to provide adequate GI that will provide a net gain for biodiversity.	The Council acknowledge support.
Support CP45 (2)	Respondents support CP45 stating all new housing sites should have green leisure areas which need to be identified and safeguarded and pleased to see the Council has commissioned a joint Green Infrastructure Strategy with South Oxfordshire District Council	The Council acknowledges support.

Core Policy 46: Conservation and Improvement in Biodiversity

Category	Summary	Council Response
Chapter 6 Para 6.123	b) The 2011 Local Plan safeguarded land along the route of the former Wilts and Berks Canal – I am concerned that this safeguarding seems to have been removed in the 2013 draft plan – although the previous policies (L14 and L15) have been “saved”.	Saved Policies L14 and L15 will still apply as set out in Appendix G of the Plan, which are regarding the Wilts and Berks Canal. The Wilts and Berks Canal is discussed in the Natural Environment Topic Paper 9 (TOP09) and concludes these Saved Policies will be reviewed and more appropriate for Local Plan Part 2.
English heritage Comments	English Heritage suggest that the plan should also refer to historic significance of the Wilts and Berks Canal within the second bullet point at para 6.124	The Council acknowledges English Heritage response and agree the text needs amending to ensure it is effective. This can be seen in the Council's 'Schedule of Proposed Minor Changes' (DLP11).
Farmland birds (Policy Wording) (1)	Natural England states the Sustainability Appraisal advises net gain in biodiversity particularly targeting farmland birds therefore National England suggest that emphasis should be put on targeting farmland birds in the text supporting this policy.	Point noted. The Council consider CP46 appropriately addresses biodiversity which includes farmland birds as stated in the Sustainability Appraisal.
Farmland birds (Policy Wording) (2)	Natural England advise one small change of policy wording to ensure it is effective. Policy CP46 should read: “...measures can be provided (and are secured...)”.	The Council acknowledges Natural England's response and agree the text needs amending ensure it is effective. This can be seen in the Council's 'Schedule of Proposed Minor Changes' (DLP11).
Impact on biodiversity at East Hanney site	2 respondents concerned regarding the impact of development at the site at East Hanney on the wildlife area at Letcombe Brook. Suggest the Council should reconsider site selection and either reduce or remove East Hanney site.	The proposed strategic sites are supported by a robust site selection process as demonstrated within the Strategic Sites Selection Topic Paper 3 (TOP03) which includes consideration of the environment. Appendix A of the Plan includes Site Development Template for the proposed South of East Hanney allocation (pgs. 18-19) setting out a number of site specific development and infrastructure requirements. This includes a number of landscape and biodiversity considerations including identification that the Letcombe Brook as a positive asset and care should be taken within the siting of any development along its boundary. Furthermore as identified in Appendix G of the Plan, Saved Policies L2 and L3: Urban Open Space and Green Corridors which cover the Letcombe Brook as a wildlife corridor, still apply until reviewed by Local Plan 2031 Part 2.

Category	Summary	Council Response
Impact on biodiversity at North Abingdon	2 respondents object to development at North Abingdon in the greenbelt due to the associated loss of wildlife habitats and adverse impact on neighbouring Black's Wood Ancient Woodland and the Sugworth SSSI.	The proposed strategic sites are supported by a robust site selection process as demonstrated within the Strategic Sites Selection Topic Paper 3 (TOP03) which includes consideration of the environment and wildlife. Appendix A of the Plan includes Site Development Template for the proposed North Abingdon allocation (pgs. 9-10) setting out a number of site specific development and infrastructure requirements.
Impact on biodiversity at White's Lane, Radley	1 respondent is concerned that site 28 (North West Radley) at White's Lane, Radley for 240 houses will impact on biodiversity which has not been addressed.	The proposed strategic sites are supported by a robust site selection process as demonstrated within the Strategic Sites Selection Topic Paper 3 (TOP03) which includes consideration of the environment and biodiversity. Appendix A of the Plan includes a number of general requirements that all housing allocations will be required to meet, including the developer to carry out habitat and species surveys in accordance with the Guidelines for Ecological Impact Assessment and relevant best practice guidance, development should achieve biodiversity net gain and important ecological assets should be retained, where possible.
Object to CP46	1 respondent considers that the impact on the environment and the countryside has not been fully considered.	The Council consider the impact of the Plan on the environment and countryside has been fully considered in line with the NPPF. The Plan sets out its policies on these matters in CP 37-46 and CP13 and a number of Saved Policies setting out more detailed policies will continue to be applied until reviewed by the Local Plan 2031 Part 2. The Plan's policies on the environment and countryside are supported by a number of evidence base studies including a Local Green Belt Review (NAT02-03), a number of Landscape Studies (NAT04-08.3), Sustainability Appraisal Process (DLP04-04.2) and the Habitat Regulations Assessment (DLP06).
Support CP46	Oxfordshire County Council support CP46	The Council welcomes Oxfordshire County Council support to Core Policy 46
Wilts & Berks Canal	Wiltshire Swindon & Oxfordshire Canal Partnership, the Wilts & Berks Canal Trust and 2 other respondents would like the previous policy to be reinserted. The Partnership seeks assurance from VWHDC that the saved Local Plan Policies (L14 & L15) are to be given full recognition	Saved Policies L14 and L15 will still apply as set out in Appendix G of the Plan, which are regarding the Wilts and Berks Canal. The Wilts and Berks Canal is discussed in the Natural Environment Topic Paper 9

Category	Summary	Council Response
	within the Part 1 Plan in the interim period until a new policy is developed for Part 2.	(TOP09) and concludes these Saved Policies will be reviewed and more appropriate for Local Plan Part 2.

Chapter 7: Implementing the Plan

Core Policy 47: Delivery and Contingency

Category	Summary	Council Response
5 year supply	Four representations received out of a total of 22 seek for Core Policy 47 to make greater reference to addressing five year housing land supply. Recommendations include how any shortfall will be accrued and a methodology of how this will be done, including a monitoring trajectory. Another seeks a commitment to the delivery of a five year housing land supply in the policy. Another requests an addendum to the Sustainability appraisal so that the Sedgefield approach to delivery can be assessed as a 'reasonable alternative'	<p>The requirement for local planning authorities to assess and demonstrate a 5 year supply of deliverable housing sites is set out paragraph 47 of the National Planning Policy Framework. The recently published Planning Practice Guidance provides further guidance on the assessment stating that:</p> <p>“...Local planning authorities should ensure that they carry out their annual assessment in a robust and timely fashion, based on up-to-date and sound evidence, taking into account the anticipated trajectory of housing delivery, and consideration of associated risks, and an assessment of local delivery record... ...By taking a thorough approach on an annual basis, local planning authorities will be in a strong position to demonstrate a robust five year supply of sites. Demonstration of a five year supply is a key material consideration when determining housing applications and appeals. As set out in the National Planning Policy Framework, a five year supply is also central to demonstrating that relevant policies for the supply of housing are up-to-date in applying the presumption in favour of sustainable development.” (Paragraph 3-033)</p> <p>“The approach to identifying a record of persistent under delivery of housing involves questions of judgement for the decision maker in order to determine whether or not a particular degree of under delivery of housing triggers the requirement to bring forward an additional supply of housing. The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle. Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local</p>

Category	Summary	Council Response
		<p>planning authorities will need to work with neighbouring authorities under the “Duty to Cooperate”. (Paragraph 3-035)</p> <p>The assessment of a 5 year supply of deliverable housing sites is also reiterated in the Council emerging Local Plan 2031’s “Monitoring Framework” (Appendix H). In line with current guidance, assessment would be updated every twelve months (unless the Council wishes to update its assessment earlier), and as part of this, assessment would be considered against the forecast trajectory for the delivery of sites and also the deliverability of all the sites in the five year supply.</p> <p>The Housing Topic Paper (submission evidence document) sets out the latest housing trajectory for district (2014 assessment). In relation to housing land supply, the document provided an assessment of both the “Sedgefield” approach to five year supply whereby any backlog is made up in the first five years to 31 March 2020, and the “Liverpool” approach whereby backlog is made up over the full remaining plan period to 2031. The housing trajectory demonstrates that the Council cannot fully make up its previous undersupply within the first five years of the plan because when a 20% buffer is included, the sheer scale of frontloaded growth required to do so it is not realistically deliverable (taking into account the delivery implications of bringing forward multiple sites in close proximity are considered, i.e. market behaviour and competition). Further and related to this, as documented in the Infrastructure Delivery Plan and Water Cycle Study, development in the first five years of the plan will be affected by the number and scale of upgrades required to ensure the water and waste water infrastructure is able to cope with the demand from growth. The Council has committed to meeting its full objectively assessed need, as required by national policy, and would do so over the full plan period. However, it is unable to fully make up the past undersupply of houses within the first five years, as</p>

Category	Summary	Council Response
		<p>preferred by national policy, this is because evidence has shown that it would be undeliverable to meet the housing target under a "Sedgefield" approach at the beginning of the plan period, even by spreading the growth by allocating smaller sites in a variety of locations across the District. On this basis, there are no reasonable alternative options to SA with regard to five year housing land supply.</p>
Employment/Infrastructure monitoring	Representation requests to provide for slower employment growth. Another requests 'when' and 'how' targets and to include monitoring of employment and infrastructure delivery	<p>Chapter 7 of the emerging Local Plan states that to monitor the effects of the Local Plan 2031, including both its intended and unintended effects and its effectiveness towards meeting the objectives set out in the plan, a monitoring framework has been prepared to accompany this plan. The plan's "Monitoring Framework" sets out how each core policy will be monitored and the indicators that will be used to measure progress and possible actions if targets are not being met. Significant Effect Indicators (identified by the Sustainability Appraisal) will be measured alongside the framework.</p> <p>In relation to the monitoring of employment, the framework is clear that there should be:</p> <ul style="list-style-type: none"> - "satisfactory" progress should be made by the end of the first years for the net number of jobs created - Year of year increase in all B use class floor space - 95% of B class development on strategic sites and saved allocations and town centres - Allocated sites are safeguarded for employment developments, unless it could be demonstrated that criteria in CP29 are met - In rural areas, new employment developments limited to the re-use, conversion or adaptation of suitable existing buildings <p>In relation to the monitoring infrastructure delivery, the framework is clear that there should be:</p> <ul style="list-style-type: none"> - Timely delivery of projects identified by the Council's infrastructure evidence base (Infrastructure Delivery Plan),

Category	Summary	Council Response
		<p>including projects identified through the Local Plan (CP17 & CP16), Science Vale UP Integrated Transport Package, SPDs and masterplan for strategic sites, Local Transport Plan, Local Enterprise Partnership and relevant strategies, local communities and neighbourhood plans, infrastructure partner's capital investment strategies</p> <ul style="list-style-type: none"> - The safeguarding of land required for strategic infrastructure projects - Increase number of households with good transport access to key services or work - Car parking provisions should meet standards agreed with OCC <p>If targets are not met, the Council would review issues and actions available to bring forward employment and infrastructure delivery. In addition, Core Policy 47 states that if the Authority's Monitoring Report shows that allocated development sites and/or development to be brought forward through neighbourhood plans are not coming forward in a timely manner, the Council will consider:</p> <ul style="list-style-type: none"> - Seeking alternative sources of funding if a lack of infrastructure is delaying development, to bring delivery back on track - Investigate mechanisms to accelerate delivery on other permitted or allocated sites - Identifying alternative deliverable sites that are in general accordance with the Spatial Strategy of this plan, through the Local Plan 2031 Part 2 or another appropriate mechanism, and if required - Through a full or partial review of the Local Plan 2031.
Green belt	<p>A representation seeks for Core Policy 47 to reflect the issues associated with development of sensitive sites within the green belt and how this may impact upon the delivery of these sites. They request that the policy also makes reference to the potential</p>	<p>The Council consider the proposed sites in the Local Plan are suitable and deliverable and thus there is no requirement for this policy to identify any specific delivery issues as proposed. The Plan recognises a future strategic Green Belt Review may be needed and may contribute to any identified unmet housing</p>

Category	Summary	Council Response
	for a strategic green belt review to deal with potential under-delivery elsewhere.	need within the Oxfordshire Housing Market Area as outlined in paragraph 5.41 of the Plan.
Increase freq.	13 records of a total of 22 received request that monitoring framework is revised so that checks take place every two years.	<p>Local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan is progressing and are encourage to report as frequently as possible on planning matters to communities. This is important to enable communities and interested parties to be aware of progress.</p> <p>In line with current guidance, the Council will publish information at least annually to show progress with Local Plan implementation and report any activities relating to the “duty to cooperate”. The Council will use the Authority Monitoring Report to provide up to date information on the implementation of any neighbourhood plans that have been made, and contribute to decisions whether there is a need to undertake a partial or full review of the Local Plan 2031.</p>
Landscape	One representation requests that landscape indicators should include developments that detrimentally affect the AONB.	In relation to the monitoring of policy CP44 (Landscape), the Council will monitoring permissions and developments within designated AONB areas, to ensure developments did not conflict with the conservation and enhancement of AONB and that locally valued features are protected, maintained and where possible, enhanced.

General Comments

Category	Summary	Council Response
Reasonable Alternatives	One representation states that the reasonable alternatives where made before the SHMA and are therefore no longer relevant.	The Sustainability Appraisal informing the Local Plan 2031 Part 1 has undergone a number of revisions and updates throughout the plan making process to accommodate new evidence and assess reasonable alternatives. The SA was updated and consulted on with the Local Plan in February 2014 and again in November 2014, after the SHMA had been published.
Local Plan - General Comments (2)	Object to the Local Plan for a number of reasons as outlined in our comments	Objections to the soundness of the Local Plan are responded to elsewhere.
Local Plan - Plan period	<ul style="list-style-type: none"> LP should plan for a shorter period then review the situation. 	<p>Local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan is progressing and are encourage to report as frequently as possible on planning matters to communities. This is important to enable communities and interested parties to be aware of progress.</p> <p>In line with current guidance, the Council will publish information at least annually to show progress with Local Plan implementation and report any activities relating to the “duty to cooperate”. The Council will use the Authority Monitoring Report to provide up to date information on the implementation of any neighbourhood plans that have been made, and contribute to decisions whether there is a need to undertake a partial or full review of the Local Plan 2031.</p>
Local Plan Procedure	<p>It is essential the whole procedure is transparent.</p> <ul style="list-style-type: none"> Is the method of production for the Plan in two parts is the most appropriate procedure given the guidance contained in NPPF para 13: ‘should all Local Plan policies be contained in one document?’ Government guidance advises LPA to prepare a single LP for its area, while site allocations are produced through additional LP’s or AAP’s. The Vales LP fails to justify its reasoning behind its method of production. A single plan 	<p>The evidence informing the Local Plan 2031 Part 1 has been available to view online and in the council offices. The submission document library, which contains all documentation relevant to the examination version of the Local Plan 2031 Part 1 has been submitted to the inspector and is also available to view on our website.</p> <p>The council considers a two part approach the most effective method to adopting an up-to-date local plan in the short term. This will ensure that</p>

Category	Summary	Council Response
	would enable a more cohesive approach. • If a full or partial review is required (CP2) is likely to have repercussions for the prepared timescales for Science Vales APP and LP2. Endorsing a single LP to be prepared. • Given the rural nature of the district it is appropriate to assume the development will be spread across settlements in order to meet the required housing supply. This can not be done with the LP current state.	we are meeting our objectively assessed housing needs in a controlled manner, maintaining a five year housing land supply across the district, and ensuring that infrastructure, services and facilities are planned and delivered alongside growth. Local Plan 2031 Part 2 will comment upon adoption of Part 1 and will deal with more local matters, including updated policies to inform development management, and smaller housing allocations not required to be delivered in the short term. Such sites may be allocated through neighbourhood development plans.
Local Plan - General Comments (3)	Houses on existing land need building first	The Local Plan seeks to allocate sufficient land to meet its objectively assessed housing need in full for the period up to 2031. The council needs to maintain a five year housing supply and has sufficient evidence to demonstrate that the trajectory for delivering homes up to 2031 is effective.
Local Plan - General Comments (4)	<ul style="list-style-type: none"> • The Plan does not ensure all development will meet the presumption of sustainable development. • No criteria for monitoring purposes. • Does not address the problem of under-occupation. • Does not identify lifetime neighbourhoods • Does not prioritise low carbon transport and concentrates on works that increase car dependency. 	<p>Monitoring: The councils monitoring policy is set out in Core Policy 47, with specific criteria set out in Appendix G.</p> <p>Under-occupation: The Oxfordshire-wide Strategic Housing Market Assessment is a robust evidence document which sets the housing mix for the district and this will inform future development proposals for the plan period. Core Policy 38 supports how the mix of housing types and tenures is integrated and supports a range of household sizes, ages and incomes to meet identified housing need.</p> <p>Low carbon transport: Core Policy 33 supports developments which promote sustainable transport modes and accessibility. Core Policy 35 supports the promotion of public transport, cycling and walking.</p>
Local Plan - General Comments (5)	Concerned the proposals will destroy the Vale and the area is being frequently associated with Greater London. Over population will lead to social unrest.	The predicted growth for the district is supported by a Strategic Housing Market Assessment which is consistent with the NPPF and Guidelines. The Local Plan 2031 Part 1 seeks to meet the needs of the district and does not meet the needs of neighbouring areas.
Local Plan - General Comments (6)	Raised points on process	Comment is noted. Each of the local authorities are at various stages of the plan making process in order to address the needs of their

Category	Summary	Council Response
		respective areas. The Oxfordshire authorities continue to work together to ensure that the needs of the market area up to 2031 are met in full.
Local Plan - General Comments (7)	<ul style="list-style-type: none"> • No advice has been sought from the Health Service Providers. 	The local planning authority has consulted at various stages in the plan making process, both formally and informally with health service providers, both in Oxfordshire and in neighbouring areas such as Swindon. This is consistent with our Statement of Community Involvement (SCI) and as part of the legal requirement that is the Duty to Cooperate.
Local Plan - General Comments (8)	<ul style="list-style-type: none"> • There are local businesses that have been given their notice for tenure, meaning investment into the local community and infrastructure and benefits from the infrastructure will not be secured, thus reducing the viability of local business. 	The concern here relates to landowners and the issuing of tenures which is outside of the remit of planning. The Local Plan 2031 Part 1 supports development of the rural economy through Core Policy 28: New Employment Development on Unallocated Sites. Saved Policies E8 (Local Rural Sites), E11 (Rural Multi-User Sites), E16 (New buildings required for agricultural purposes), E18 and E19 (Farm shops) will continue to exist and will be reviewed through Local Plan 2031 Part 2.
Local Plan - SEA/SHMA	The main objections to the Plan are: i. The preparation of the Plan is not legally compliant because the SA/SEA has failed to consider reasonable alternatives including a strategy to provide for the housing needs of the Housing Market as a whole, rather than just for the needs of the District. ii. The Duty to Cooperate has not been adequately satisfied. iii. The Plan is fatally flawed in making provision for the District's housing needs only and postponing making provision for the wider Housing Market Area. iv. The District has a severely deficient 5 year housing land supply and there is no evidence that the strategic sites identified will be able to remedy the situation. v. The methodology for selecting the strategic sites is opaque and inconsistent. vi. The criticisms of the Radley South site are unjustified and it is noteworthy that it has already been recommended to be taken out of the Green Belt. vii. Further studies (appended to this Report) have demonstrated that the site is suitable for inclusion in the Plan, would make a worthy	<p>The Council Consider the Plan is sound, based on robust and fit-for-purpose evidence and fully justified in accordance with national policy requirements. The SA/SEA processes have been conducted by independent and expert consultants and is considered to have tested all reasonable alternatives. The issue of un-met need is clearly addressed through CP2. The plan clearly seeks to meet the Objectively Assessed Need in full and to achieve and maintain a Five Year Land Supply.</p> <p>The South Radley Site is not considered suitable for 'strategic' development. However, it is likely that this site would be considered through the preparation of the Local Plan 2031 Part 2. The Site Selection is considered to be adequately outlined within the Site Selection Topic Paper.</p>

Category	Summary	Council Response
	contribution to housing needs and could be delivered in the short-term	
Local Plan - General Comments (9)	<ul style="list-style-type: none"> It is the Vales responsibility to protect Botley urban character and Vales rural character. 	<p>Objection noted. Regarding the Vale's rural character Core Policy 44 states that where development is acceptable in principle "measures will be sought to integrate it into the landscape character. Proposals will need to demonstrate how they have responded to the landscape character. Developers would be expected to incorporate appropriate landscape proposals that reflect the character of the area through appropriate design and management.</p> <p>Core Policy 37: Design and Local Distinctiveness ensures that proposals for new development will be expected to be of high quality design that responds positively to the site and its surroundings and reinforces local identity.</p> <p>Topic Paper 8: The Built and Historic Environment and Topic Paper 9: The Natural Environment sets out the Council's approach to the preparation of the Local Plan Part 1 with regards to the Natural and Built and Historic Environment.</p> <p>Furthermore, the Council have published an adopted Design Guide SPD which sets out clear design principles to guide future development within the District and to encourage a design-led approach to development. It addresses a range of development types from urban extensions and large residential developments to mixed-use areas, areas of employment and commercial use.</p> <p>Regarding development at Botley, Core Policy 11: Botley Central Area states that proposals for a comprehensive retail-led development and upgrading of Botley Central area will be supported provided that it can be demonstrated that proposals will not harm the character or appearance of the local area.</p>

Category	Summary	Council Response
Site Development Templates	<ul style="list-style-type: none"> • Concerned that the quality of public rights of way running through or adjacent to the various allocations will not be maintained in line with NPPF 75. • The text needs amendment to ensure protection. 	The Council consider that this matter is adequately addressed in the Development Site Template Wording.

Sustainability Appraisal Comments

Category	Council Summary	Council Response
SA (2)	<p>Previous alternatives considered in SA are unreasonable as they are pre-SHMA. SA Report - Part 1 makes no mention to wider context and relationship to other plans or programmes.. No effort has been made to look at overall environmental capacity of the SHMA/ LEP area to absorb the types and scale of development envisaged. The relative ratings of adverse effects in the tables in Appendix are simply not credible, and by rolling landscape, archaeology and built heritage together seriously downplay the complexity of effects where for example several separate national designations are affected. The approach has actively prevented a proper assessment compliant with the SEA requirements from being done. Not enough mention of synergistic, secondary or cumulative effects. The potential environmental effects of the scale of development that is envisaged by the Oxfordshire Strategic Economic Plan within the 'Science Vale Ring Fence (Section 14) have not been properly assessed. The SA does not explain at any point any technical difficulties to explain the severe shortcomings of baseline description and assessment of effects in the assessment identified above, and indeed there is no excuse for not making them far more robust and realistic based on readily available knowledge, field observation and experience of the past environmental effects of comparable types of development. NTS does not provide the required information. Do not agree that it is reasonable to test OAHN given constraints e.g. Green Belt and AONB in the Vale. "The sustainability assessment therefore wrongly accepts the inroads into the Green Belt, AONB, the setting of Listed Buildings etc as being sanctioned by the NPPF, when the opposite is the case"</p>	<p>See updated chapters, 10, 11 and 12 within this SA Report for further clarification, with regard to previous alternatives considered by the SA.</p> <p>With Regard to 'reasonable alternatives': SA Report Section 10 and 11 outlines the process followed to date, referring to the Site Selection Topic and section 12 provides detailed information on site selection and alternatives considered.</p> <p>A comprehensive review can be found in Appendix 2 of the Scoping Report. Section 5 of the SA Report provides an updated summary of the context review presented within the LPP1 SA Scoping Report (2012) , updated to take into account new information that has emerged since 2012. Section 6 of the SA Report provides an updated summary of the context review presented within the LPP1 SA Scoping Report (2012).</p> <p>Reviewed and updated table 32.1 discusses cumulative effects, this section has been reviewed and updated where appropriate.</p> <p>The Council's response to the issues raised can be in found in detail in Appendix 33 of the Submission SA Report.</p>
SA (3)	Supportive of the SA process in relation to justification of this site.	Noted.
SA (1)	The respondents' concerns with the approach adopted in the SA with respect to this area (Harwell Campus) and concerns raised regarding Duty to Cooperate reflecting SHMA and Oxford City meetings its OAN.	The Council's response to the issues raised can be in found in Appendix 33 of the Submission SA Report.

Category	Council Summary	Council Response
		The SA Report did include “an outline of the reasons for selecting the alternatives dealt with” however; this outline has been amplified by adding further justification from our existing evidence base and inserted into chapters, 10, 11 and 12 within this SA Report. Sections 10.8.5 to 10.8.14 discuss OAN and Oxford City unmet need.
SA	Spatial Options: Many of the impacts are considered to require monitoring. Clarification is sought as to how the proposed mitigating measures will result in no significant environmental effects on villages of up to 500 dwellings in a rural area from an additional 8,000 dwellings, and how there would be no greater impact than the originally preferred option of 13,000 dwellings. Further justification for development in the AONB. Explanation required to whether the option of no development in the AONB has been considered as an alternative. The proposed 219 hectares of employment does not seem to be within the range tested. Question the appraisal findings for the spatial strategy alternatives, stating that significant effects will occur for Objectives 3, 7, 8, 9, 10 and 11 under Option G (high growth)	<p>The Council's response to the issues raised can be found in Appendix 33 of the Submission SA Report.</p> <p>The full appraisal for Housing Delivery Options can be found in Appendix 15. Monitoring has been recommended through the SA process see section 10.8.4 and monitoring table: 35.1 – Monitoring will be finalised at the adoption stage. The SA provides a high level assessment and is a tool to assist with decision making. A number of evidence base studies have been prepared during the development of the Plan and these along with the findings of the SA have been used to inform the development of the Submission Version of the Vale Local Plan 2031: Part 1 – Strategic Sites and Policies.</p> <p>Please also see SA Report section 12.2.6</p>
SA	The site allocations should be reviewed to ensure that the statutory duty to have special regard to preserving listed buildings and their settings and preserving or enhancing the character or appearance of conservation areas will not be compromised. The SA/SEA has not followed EH Guidance (2011, 2013) on coverage of heritage in SAs and SEAs. SA criteria are wholly inadequate with regard to heritage assets. The assessment pre-supposes the effectiveness of core policies to avoid any harmful effects instead of excluding the areas where they would arise. The assessment is very formulaic with no mention of the grades of listed buildings or their topographic or visual relationship to the site or its	<p>The Council's response to the issues raised can be found in Appendix 33 of the Submission SA Report.</p> <p>Site appraisal has considered the sites and their settings and identified where an allocation could lead to an adverse effect, recommending sites that have the least effect on heritage assets. Mitigation measures and sensitive design will be required. English Heritage have suggested measures to increase the effectiveness of mitigation.</p>

Category	Council Summary	Council Response
	historic character in relation to them. Further monitoring indicators suggested.	In regard to EH Guidance (2011, 2013), We have used a proportionate approach based on GIS and stakeholder input. A Historic Landscape Study has been carried out by OCC and this information has been used as baseline data during the SA Process. We have consulted English Heritage through-out the development of the Plan. English Heritage comments have been integrated into the SA and the Plan.
SA	The option of Oxford City Council 'unmet need', should have been considered through the SA. Three further strategic housing delivery options have been suggested. • VoWH OAN + 2,000 pursuant to Oxford unmet need, i.e. 22,560 in total; • VoWH OAN + 4,000 pursuant to Oxford unmet need, i.e. 24,560 in total; • VoWH OAN + 5,500 pursuant to Oxford unmet need, i.e. 26,060 in total. The City Council considers that it is necessary to test an additional option for the 'overall pattern of development' that would focus development adjacent or in close proximity to Oxford.	The SA Report did include "an outline of the reasons for selecting the alternatives dealt with" however; this outline has been amplified by adding further justification from our existing evidence base and inserted into chapters, 10, 11 and 12 within this SA Report. Sections 10.8.5 to 10.8.14 discuss OAN and Oxford City unmet need.
SA	Disagree with LVIA findings. SA Scoring of site options is unclear. Provide further justification that all reasonable alternatives have been considered including the overall strategy to establish whether more appropriate sites are located outside the AONB to deliver all or part of this quantum of development. Provide additional justification and explanation of proposed approach in Oxfordshire and meeting individual OAHN. Concerns over landscape impact at Land south of East Hanney; East of Kingston Bagpuize with Southmoor; North of Shrivenham in that development would be contrary to LCS findings. North of Shrivenham site is likely to have adverse hydrological effects on Tuckmill Meadows SSSI. Need to provide further justification to state the economic impact of the site allocation; and why development in adjacent is better than development further away outside the AONB. Further justification required as to the difference between February 2014 consultation sites and November 2014 sites.	In recognition of the landscape sensitivities of these sites a Landscape and Visual Impact Assessment (LVIA) has been prepared to inform the scale and form of the development. The SA Report did include "an outline of the reasons for selecting the alternatives dealt with" however; this outline has been amplified by adding further justification from our existing evidence base and inserted into chapters, 10, 11 and 12 within this SA Report. For further details on the Council's response to the issues raised please see Appendix 33 of the Submission SA Report.

Category	Council Summary	Council Response
SA	<p>Appendix H: Monitoring and Implementation Framework. The landscape indicators should include developments which detrimentally affect AONBs, i.e. exclude ones within which do not have a detrimental impact, and include ones outside of the designated area which do have a detrimental impact. In general terms the indicators and targets (with respect to landscape, green infrastructure and biodiversity) appear to be vague, difficult to measure, and in some cases not directly related to the effects of the plan. For example, it is not clear how measuring “permissions and developments within designated AONB areas” (output presumably a number per annum) would allow one to ascertain whether the two targets (Developments would not conflict with the aims of conservation and enhancement of AONB and Locally valued. The landscape indicators should include developments which detrimentally affect AONBs, i.e. exclude ones within which do not have a detrimental impact, and include ones outside of the designated area which do have a detrimental impact.</p>	<p>Monitoring table 36.1 has been reviewed and updated where appropriate, the monitoring will be finalised at the adoption stage.</p> <p>For further details on the Council's response to the issues raised please see Appendix 33 of the Submission SA Report.</p>
SA	<p>We are also concerned that if it has been judged that the distribution of housing is the most sustainable to meet identified need within the plan area, whether the option of seeking to meet the need outside of the plan area has been sufficiently explored. This option does not appear to have been tested within the Sustainability Appraisal and Natural England would welcome clarification as to whether such an option has been discussed with neighbouring authorities through the duty to cooperate.</p>	<p>The full appraisal for Housing Delivery Options can be found in Appendix 15. SA Report Section 11.9 has been updated within the report to make a clear reference to proposed mitigation for potential negative effects.</p> <p>For further details on the Council's response to the issues raised please see Appendix 33 of the Submission SA Report.</p>
SA	<p>The Sustainability Appraisal has no clear preference for any particular strategy, so the preferred Strategy in Policy 15 has not been justified by robust evidence. It does not take sufficient account of the growth of housing at Didcot in the Vale and South Oxfordshire. Policy 15 leads to a lower percentage of dwellings in the larger urban areas where the wider range of jobs, shops, and services results in a more sustainable form of development than alternative Options A, C, D, & E in Appendix 15 of the Sustainability Appraisal</p>	<p>The full appraisal for Housing Delivery Options can be found in Appendix 15. SA Report Section 11.9 has been updated within the report to make a clear reference to proposed mitigation for potential negative effects.</p> <p>For further details on the Council's response to the issues raised please see Appendix 33 of the Submission SA Report.</p>

Category	Council Summary	Council Response
SA	<p>Site appraisal of specific alternative sites. We note that a number of allocations have been dropped or had numbers reduced from the plan since the February 2014 consultation. Excluding the reduction at Harwell Campus, these appear to total some 2600 dwellings, including 1000 in the (revised) South East vale sub area, at a site (Milton Heights) less than 5km from the Harwell Campus with minimal if any impact on the AONB. Whilst it is not our role to promote alternative sites, in terms of the major development test, it would appear that there are alternatives which were deemed viable in the February 2014 consultation, which would cater for the bulk of the allocation at Harwell Campus. We note that Milton Heights was reduced due to an objection from Oxfordshire County Council (OCC) on highway grounds, but there has been no discussion as to how fundamental that objection is compared to the “great weight” consideration due to the AONB. Further explanation on this issue would be welcomed.</p>	<p>The SA Report did include “an outline of the reasons for selecting the alternatives dealt with” however; this outline has been amplified by adding further justification from our existing evidence base and inserted into chapters, 10, 11 and 12 within this SA Report. Further information on each alternative site considered and reasons for exclusion can be found within the Site Selection Topic Paper Nov 2014</p> <p>For further details on the Council's response to the issues raised please see Appendix 33 of the Submission SA Report.</p>
SA	<p>Landscape and sustainability assessment of the Harwell Campus sites 3. Whilst we note and welcome the additional landscape assessment work that the Council has undertaken to understand the landscape capacity of the allocations associated with the Harwell campus, we disagree with the conclusion that: 12.4.2 ‘The mitigation strategy would screen the majority of the views of the development at maturity (20 years). The character within the Option 2 land would change, but the overall character of Parcel 1 would be consistent with the landscape character of the wider landscape to the west of the campus. The character of the AONB would change but these changes would be compatible with the management plan and would not constitute significant harm to the wider AONB landscape.’</p>	<p>In recognition of the landscape sensitivities of these sites a Landscape and Visual Impact Assessment (LVIA) has been prepared to inform the scale and form of the development of land surrounding Harwell Campus to accommodate future residential development. The council appointed Hankinson Duckett Associates to undertake a landscape and visual appraisal of the land surrounding Harwell Campus, Oxfordshire (Plan HDA 1). This report assesses the relative capacity of parcels of land surrounding Harwell Campus to accommodate future residential development. The Report findings have been used to carry out the SA of sites 12 & 13</p> <p>For further details on the Council's response to the issues raised please see Appendix 33 of the Submission SA Report.</p>
Para 1.35 SA	<p>In Natural England’s opinion when housing numbers were substantially increased, the proposed distribution should have been reappraised, given the environment constraints of the area. Topic paper 2 Spatial Strategy</p>	<p>The SA Report did include “an outline of the reasons for selecting the alternatives dealt with” however; this outline has been amplified by adding further justification from our existing</p>

Category	Council Summary	Council Response
	<p>(2014) outlines under Para 3.46 that the up to date Strategic Housing Market Assessment (SHMA), published in 2014, formed the basis for the housing target for the Vale of White Horse Local Plan. As a result of the SHMA the housing target was increased in comparison to earlier versions of the Plan and as a result more strategic site allocations were added, Natural England advises that further explanation is required to justify the approach taken considering it directly resulted in further housing proposed</p>	<p>evidence base and inserted into chapters, 10, 11 and 12 within this SA Report. Further information on each alternative site considered and reasons for exclusion can be found within the Site Selection Topic Paper Nov 2014</p> <p>For further details on the Council's response to the issues raised please see Appendix 33 of the Submission SA Report.</p>

