

Vale Local Plan Part 1 Review - 2021

Background to Local Plan Part 1 and 2

The Vale Local Plan 2031 Part 1: Strategic Sites and Policies (LPP1) was adopted on 14 December 2016. It set out the development strategy and key strategic policies for the district, including the need for housing, employment and infrastructure required to support development up to 2031. Its spatial strategy makes provision for growth of around 23,000 new jobs, 218 hectares of employment land and at least 20,560 new homes, to be delivered during the plan period from 2011 to 2031.

To complement LPP1, Local Plan 2031 Part 2: Detailed Policies and Additional Sites (LPP2) was adopted on 9 October 2019 and set out: policies and locations for new housing to meet the Vale's proportion of Oxford City's unmet housing need, which cannot be met within the City boundaries; policies for the part of Didcot Garden Town that lies within the Vale of White Horse District; detailed development management policies that complement the strategic policies as set out in the Part 1 Plan (and where appropriate, replace the remaining saved policies of the Local Plan 2011); and additional site allocations for housing.

Reviewing Local Plans: Legislation

Legislation introduced in 2018 requires that Local Plan reviews must be completed five years from the date of adoption. For example, Regulation 10A of the Town and Country (Local Planning) (England) Regulations 2012 (as amended) state that: *'10A. (1) A local planning authority must review a local development document within the following time periods — (a) in respect of a local plan, the review must be completed every five years, starting from the date of adoption of the local plan, in accordance with section 23 of the Act (adoption of local development documents).'*

The National Planning Policy Framework (NPPF), Paragraph 33, also states:

'Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future'.

As LPP1 was adopted on 14 December 2016, it needs to be reviewed by December 2021 to comply with Regulation 10A.

Wider Context

To avoid confusion, it is helpful to keep separate the concept of a 'review' of a local plan and the concepts of a 'revision' and 'replacement' of a local plan. A 'review' is a preliminary step to resolve *whether* an adopted local plan is in need of 'revision' or 'replacement' or not. A 'revision' is a process of changing all or part of the content of an adopted local plan. Such a 'revision' (under section 26 of the Planning & Compulsory Purchase Act 2004) would follow the same statutory processes of consultation and independent examination as would a local plan. Separate again is the concept of a 'replacement', which is where an adopted local plan is not subject to 'revision' but is replaced (in whole or part) by another local plan. The preparation of a joint local plan (under section 28 of the Act) covering two or more local planning authority areas instead of a collection of individual local plans would be an example of a 'replacement'. A joint local plan would also undergo statutory consultation and independent examination. Both 'revision' and 'replacement' can also come about without any prior 'review', for example where a new plan period is being considered.

The Council has agreed to an overall replacement of LPP1 and LPP2 as such, via the commitment to prepare a Joint Local Plan, in partnership with South Oxfordshire District Council - and also through the preparation of the Oxfordshire Plan 2050 – a joint spatial plan for all Oxfordshire district authorities. The decision to prepare a Joint Local Plan and to approve a new Joint Local Development Scheme, were made at [Vale of White Horse District Council Meeting](#) on 24 March 2021 and South Oxfordshire's District Council Meeting on 25 March 2021.

The context for the Joint Local Plan is therefore different from LPP1 and LPP2, with new Corporate Plans for Vale of White Horse and South Oxfordshire District Councils being in place, as well as the Oxfordshire Plan 2050 being prepared and scheduled for adoption in less than 2 years (June 2023).

The Council's commitment to preparing the Oxfordshire Plan 2050 (a Joint Strategic Spatial Plan (JSSP)) came through the Oxfordshire Housing and Growth Deal, and includes all Oxfordshire Districts and Oxford City Council. This document will become part of the Development Plan following its Examination in Public - and once the Councils adopt it. The Oxfordshire Plan 2050 will contain Oxfordshire-wide strategic policies, providing the strategic planning framework, as well as an evidence base, to support sustainable growth across the county, identify the scale of future growth to the year 2050 and set development principles, as well as showing some broad locations for accommodating that growth (at a high level) and elements like nature recovery. It currently will not contain detailed land-use allocations. However, it will set an overall development requirement. For Vale, our Joint Local Plan with South Oxfordshire will set the detailed planning policies and district site allocations. It will still need to provide the evidence and local information to influence district policies on key topics such as climate change, housing, transport, green infrastructure, towns/retail, economic development and healthy places.

However, the fact that the Council has already settled on a strategy to replace LPP1 and LPP2 in due course does not constitute a 'review' of LPP1 for the purposes of Regulation 10A or mean that the Council has already decided its policies need updating. Nor does it determine the outcome of that review. Such a review could conclude that no further action is required or that one or more of the policies of LPP1 should be revised or replaced either in the short term or in the longer term.

Objective

This review focuses specifically on evaluating LPP1's policies and providing a conclusion/RAG rating regarding their continued fitness for purpose – to account for their consistency with national policy, current evidence and any changes in local circumstances. Where policies are intertwined, supplemented or superseded by LPP2 policies, this has been indicated in the policy review table. Please see the Red/Amber/Green (RAG) key below:

Key:

Green	Policy remains consistent with national policy. Current evidence or changes in local circumstances do not indicate that the policy needs to be updated.	Amber	Policy is generally consistent with national policy, and/or current evidence or changes in local circumstances indicate that policy updating can be appropriately achieved via the Joint Local Plan / Oxfordshire Plan 2050.	Red	Policy (or part of the policy) is inconsistent with national policy and current evidence and/or changes in local circumstances indicate that the policy (or part of the policy) requires updating via the Joint Local Plan / Oxfordshire Plan 2050.
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Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 1: Presumption in Favour of Sustainable Development	Though the NPPF's wording of the presumption in favour of sustainable development has evolved since LPP1 was adopted, the overall aims remain the same and this policy is generally consistent with the NPPF.	The Planning Practice Guidance confirms there is no longer a requirement for plans to include such a policy.	n/a	The policy is generally consistent with the NPPF and local circumstances do not indicate that the policy needs updating at this time. The Joint Local Plan will consider the approach to 2041 as there is no

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	The Planning Practice Guidance (PPG) confirms there is now <i>'no need for a plan to directly replicate the wording in paragraph 11 in a policy'</i> (see PPG at 61-036).			longer a requirement for plans to include such a policy.
Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire	The policy is generally consistent with the NPPF, in seeking to meet objectively assessed needs and accommodate Oxford's unmet need through LPP2.	The latest Authority Monitoring Report (AMR) reports: 'The number of dwellings completed in 2019/20 was 1,602 dwellings which exceeds the total housing requirement of 1,211 dwellings per annum. In accordance with Core Policy 2 of the Part 1 Plan, from 2019/20 the housing requirement consists of the District's own housing need of 1,028 homes per annum, and the District's apportionment of Oxford City's unmet housing need which represents an increase of 183 homes per annum from 1 April 2019. Positive progress has been made towards the overall housing target.'	LPP2: See Core Policy 4 and 4a (discussed below). Oxfordshire Plan 2050: Policy option 28 - Homes: How Many? Commitments and Locations	The policy remains consistent with the NPPF. Positive progress is being made and Oxford's unmet need has been accommodated as per NPPF requirements. Work is underway on the Oxfordshire Plan 2050 and Joint Local Plan to consider the future approach to this matter. The Oxfordshire Plan will set out housing requirements for each Oxfordshire District and City.

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Core Policy 3: Settlement Hierarchy	This policy is generally consistent with the NPPF, taking local circumstances into account, guiding development towards sustainable locations, avoiding isolated homes and maintaining the vitality of rural communities.	Vale of White Horse District Council's Village Facilities Study Update was published in February 2014 – a number of Town and Parish Councils have highlighted that scores and categorisations of areas will have now changed as will the accessibility by public transport as services change.	Draft Oxfordshire Plan 2050 refers to each Local Plan's settlement hierarchy. The Oxfordshire Plan revision of spatial options will have various potential implications for different tiers of settlement.	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to Settlement Hierarchies to 2041, with policies appropriately supported by robust and up to date evidence. The Oxfordshire Plan may also have some influence over policy change of settlements, but this is in early policy development.
Core Policy 4: Meeting our Housing Needs Housing Requirement	Core Policy 4 sets out the housing requirement and spatial strategy for the Vale of White Horse (excluding any requirement to meet Oxford's unmet needs). It sets an overall housing requirement of 20,560 homes over the plan period, giving an average annual housing requirement of 1,028 dwellings per annum (dpa). It was supplemented in October 2019 by Core Policy 4a in the Local Plan Part 2.	Please see Appendix 1 - which assesses the housing requirement against the prompts in the PAS toolkit.	LPP2: Supplemented by Core Policy 4a: Meeting our Housing Needs. Oxfordshire Plan 2050: Policy option 28 - Homes: How Many? Commitments and Locations.	The housing requirement requires updating. The housing requirement will be updated through the Oxfordshire Plan 2050 and the Joint Local Plan. In the meantime, for monitoring and housing land supply purposes, in accordance with paragraph 74 of the NPPF, the minimum housing requirement is 636dpa as calculated using the standard method. This should be supplemented using the 183dpa between 2019 and 2031 to accommodate unmet housing need from Oxford in accordance with Core

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	<p>Core Policy 4a added an additional 2,200 homes of unmet need from Oxford to the overall housing requirement, taking the figure to 22,760. This unmet need figure was added to the housing requirement from the year of adoption (1 April 2019) to the end of the plan period (31 March 2031), resulting in an average annual addition of 183 dwellings per annum (2,200 units over 12 years). This took the average annual housing requirement across the rest of the plan period to 1,211 homes per annum.</p> <p>The housing requirement in Core Policy 4 in LPP1 is separate from Core Policy 4a in LPP2. The latter's adoption did not replace or supersede the housing requirement adopted in December 2016, as set out in the LPP2 Inspector's report. The addition made for unmet need in Core Policy 4a</p>			<p>Policy 4a of the Local Plan Part 2. The annual housing requirement will therefore be 819 dpa. The standard method figure will change on an annual basis.</p>

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	<p>is less than five years old so does not form part of this assessment.</p> <p>This review assesses whether the housing requirement in Core Policy 4 is in need of updating in accordance with the advice in NPPF paragraphs 33 and 74. To determine this, the Council has had regard to the NPPF and NPPG and the Local Government Association's Planning Advisory Service (PAS) "Local Plan Route Mapper" (October 2021). See Appendix 1 for the assessment against the NPPG and the Toolkit prompts.</p> <p>Where a local authority has reviewed its housing requirement and considers that it needs updating, this can only be done through a new local plan. Therefore, in such circumstances the NPPF (at</p>			

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	<p>paragraph 74) and the PPG¹ instructs that local authorities should in the meantime use their minimum local housing need figure calculated using the standard method set out in the PPG. This figure changes year on year as new information is published by the Department for Levelling Up, Housing and Communities. The current annual figure² for the Vale of White Horse is 636 dpa.</p>			
<p>Core Policy 4: Meeting our Housing Needs</p> <p>Spatial Strategy</p>	<p>The spatial strategy has three main strands: focusing sustainable growth within the Science Vale Area; reinforcing the service centre roles of the main settlements across the district; and promoting thriving villages and rural communities whilst safeguarding the countryside and village character.</p>	<p>There have been no significant changes in the role that settlements have within the settlement hierarchy. Our market towns, local service centres, larger villages and smaller villages continue to play their role in the spatial strategy for the district. The spatial strategy continues to focus growth in the more sustainable locations in the district, and</p>	<p>Draft Oxfordshire Plan 2050: Policy option 28 - Homes: How Many? Commitments and Locations</p>	<p>The spatial strategy is generally consistent with the NPPF.</p> <p>The Joint Local Plan will consider the approach to spatial strategies to 2041, with policies appropriately supported by robust and up to date evidence. The Oxfordshire Plan will also influence future strategies - this is in early policy development.</p>

¹ <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-reqt>

² Using 2021 as the start date

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	<p>The spatial strategy is generally consistent with the NPPF, in promoting a sustainable pattern of development for the district, providing a clear strategy for bringing sufficient land forward, aligning growth and protecting areas of particular importance.</p>	<p>provides a clear strategy for bringing land forward, aligning growth, and protecting areas of importance.</p>		
<p>Core Policy 5: Housing Supply Ring-Fence</p>	<p>Core Policy 5 is connected to the housing requirement in Core Policy 4. The housing requirement in Core Policy 4 requires updating, and so Core Policy 5 is reviewed in this assessment. Core Policy 5 identifies a Science Vale ringfence to support planned job growth in the sub-area. This is for 11,850 homes over the plan period, equating to 593 dwellings per annum.</p>	<p>Between 1 April 2011 and 31 March 2021, 4,109 homes have been delivered within the Science Vale ringfence. This leaves a residual requirement of 7,741 homes, or 774 dwellings per annum. The Council has identified a five-year supply of deliverable housing sites within the Science Vale ringfence of 3,740 homes³. This would leave 4,001 homes, roughly 33% of the total ringfenced housing, to be delivered in the last 5 years of the plan (the last 25% of the plan period). Our housing</p>	<p>Draft Oxfordshire Plan 2050: Policy option 28 - Homes: How Many? Commitments and Locations</p> <p>The Oxfordshire Plan, when adopted, may have some influence on the use and application of a ringfence policy.</p>	<p>As acknowledged in the assessment of Core Policy 4, the housing requirement now needs updating. Core Policy 5 is connected to the housing requirement in Core Policy 4 and as such requires updating also. There is no mechanism for applying a shortfall or ringfence to the standard method calculation. Core Policy 5 will no longer be used for monitoring purposes.</p> <p>The Joint Local Plan will consider whether it is appropriate to continue to use a housing supply ring-fence to</p>

³ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/06/Vale-5YHLS-2021.pdf>, Table 6

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	<p>There is currently no explicit support for using ringfences within the NPPF or NPPG for the purposes of monitoring. Paragraph 74 of the NPPF advises that five-year supply calculations should be assessed against the housing requirements set out in adopted strategic policies. Where these policies are more than five years old and have not been subject to a review confirming they are still up to date, then local authorities should use their local housing need calculated using the standard method.</p> <p>There is no scope within the standard method calculation to ringfence parts of the district into distinct land supply areas. Furthermore, there is no mechanism for addressing shortfalls in supply using the standard method, as set out in the supporting text at Paragraph 4.22 for Core Policy</p>	<p>trajectory expects housing delivery within the ring-fence to occur at a higher rate in the later years of the plan period. This reflects the expected lead in times and build out rates of the sites that will contribute to the supply within the ring-fence.</p> <p>This record indicates that the delivery of job and housing growth has been generally on track in the Science Vale ring-fence and delivered at a consistent rate throughout the plan period. However, the ringfence policy does not identify distinct land supply areas, and it notes that a district wide housing requirement is still the basis for assessing 5-year land supply. The purpose of the policy is to justify different approaches to addressing any shortfall in housing supply (i.e., Liverpool vs Sedgefield methodology) between the two areas in the district. Where the standard method calculation is used to identify the requirement for housing land supply (see our</p>		<p>2041, with policies appropriately supported by robust and up to date evidence. In the meantime, for monitoring and housing land supply purposes, the district-wide figures will be used in line with national policy.</p>

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	5. As the housing requirement in Core Policy 4 requires updating, this creates a discrepancy between Core Policy 5 and the approach set out in Paragraph 74 of the NPPF.	<p>assessment of CP4), there is no separate mechanism for addressing a shortfall because past undersupply is already accounted for in the affordability uplift of the standard method.</p> <p>However, there is very limited risk of the ring-fenced housing in the Science Vale area not coming forward in the absence of this policy. Housing supply will continue to come forward across the district, with a focus on Science Vale in line with our spatial strategy, housing site allocations and extant planning permissions. However, the numbers set out in Policy CP5 are not consistent with the standard method and will no longer be used for monitoring purposes.</p>		
Core Policy 6: Meeting Business and Employment Needs	The policy identifies the land for future employment development on strategic sites as well as saved allocations from Local Plan 2011. The policy is consistent with the	The latest AMR states that there has been: '208 hectares of employment land permitted over the plan period, so far demonstrating good progress. There is 10 hectares of	Draft Oxfordshire Plan 2050: Policy option 22 - Supporting the Creation of Jobs; Policy option 23 -	Good progress has been made with the Vale's employment land and floorspace supply. The policy is generally consistent with the NPPF. The Joint Local Plan will consider the future approach to business and

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	<p>NPPF, identifying and safeguarding strategic sites to meet anticipated needs and making sufficient provision for employment.</p>	<p>employment land remaining to be developed.'</p> <p>There has also been 'substantial progress made towards the delivery of employment floorspace'.</p>	<p>Protection of Economic Assets</p>	<p>employment needs, with policies appropriately supported by robust and up to date evidence.</p> <p>The Oxfordshire Plan may also have some influence over employment distribution policy - this is in early policy development.</p>
<p>Core Policy 7: Providing Supporting Infrastructure and Services</p>	<p>This policy is generally consistent with the NPPF, setting out the Vale's approach to infrastructure requirements, viability constraints and explaining how infrastructure and services will be sought.</p>	<p>The new CIL Charging Schedule 2021 was examined in May 2021 and the new draft Developer Contributions Supplementary Planning Document was consulted on in January-February 2021. This identifies how the Council will ensure new development contributes to infrastructure, such as roads, schools, community facilities, leisure facilities and open space.</p> <p>Both the CIL Charging Schedule 2021 and the Developer Contributions Supplementary Planning Document have now been approved for adoption by Council (for CIL) and Cabinet (for</p>	<p>Policy Option 21: Strategic Infrastructure Priorities</p>	<p>CP7 is generally consistent with the NPPF. The Joint Local Plan will consider the approach to infrastructure as well as affordable housing and viability to 2041 - and reflect the 2019 amendments to the CIL Regulations (2010).</p> <p>The Council's Local Development Scheme has also committed to producing an Affordable Housing SPD in the next year.</p>

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		<p>the SPD), with an implementation date of 1 November 2021.</p> <p>For information, the current 'Developer Contributions – Delivering Infrastructure to Support Development' SPD was published in June 2017.</p> <p>The AMR does not highlight any issues with the policy. Core Policy 7 continues to contribute positively to the provision of infrastructure and securing S106s as shown in the Council's IDP updates reported yearly as part of the AMR and the Council's Infrastructure Funding Statement.</p> <p>There were amendments to the CIL Regulations in 2019 that the Joint Local Plan will have the opportunity to highlight.</p>		
Core Policy 8: Spatial Strategy for Abingdon-on-Thames and	Core Policy 8 sets out: the spatial strategy for the Abingdon-on-Thames and Oxford Fringe Sub-Area, including strategic sites to	The latest AMR reports that 'housing delivery in the Sub-Area is on track to meet the housing requirement and is currently over-delivering on the annual	LPP2: Supplemented by Core Policy 8a: Additional Site Allocations for	Core Policy 8 is generally consistent with the NPPF and local circumstances, as highlighted in the AMR, do not indicate that the policy needs updating at this time. The

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Oxford Fringe Sub-Area	meet anticipated needs over the Plan period; the Council's housing requirement; and identifies employment land to support business and employment growth and productivity. The policy, focusing on housing and employment, is generally consistent with the NPPF, with a clear strategy for bringing a variety of sufficient land forward.	<p>requirement'. It also states that 'the majority of growth has been delivered in the Market Town, Local Service Centre and Larger Villages, with no development in the open countryside, in accordance with the settlement hierarchy'.</p> <p>It confirms 'substantial progress is being made on strategic allocations in the Sub-Area, with all sites having either outline or full permission and two under construction'.</p> <p>With regards to employment land, 'permissions have been granted on nearly 3.4 hectares of strategic employment sites in the Sub-Area'.</p>	<p>Abingdon-on-Thames and Oxford Fringe Sub-Area and Core Policy 8b: Dalton Barracks Strategic Allocation</p> <p>Draft Oxfordshire Plan 2050: Policy option 28 - Homes: How Many? Commitments and Locations</p>	Joint Local Plan will consider the approach to future spatial strategies, with policies appropriately supported by robust and up to date evidence.
Core Policy 9: Harcourt Hill Campus	This policy is generally consistent with the NPPF in setting out a strategic policy regarding an educational setting, considering the surrounding built environment, landscape setting and sustainable site access.	The Council is now not progressing the masterplan with Oxford Brookes University.	Draft Oxfordshire Plan 2050: Policy option 27 - Meeting Skills and Education Needs	The policy itself is consistent with the NPPF, however the Council is not progressing the masterplan with the University. The Joint Local Plan 2041 will have the opportunity to review or discontinue this policy as required.

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Core Policy 10: Abbey Shopping Centre and the Charter, Abingdon-on-Thames	This policy supports the role of Abingdon town centre in the community, taking a positive approach to its growth, enhancement, and management.	The policy mentions retail Class A1 use – this Use Class has now been revoked and replaced by Class E (a,b,c) and Sui Generis.	Draft Oxfordshire Plan 2050: Policy option 24 - Town Centre Renewal; Policy option 29 - Urban Renewal	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to the Abbey Shopping Centre and the Charter to 2041, with policies appropriately supported by robust and up to date evidence.
Core Policy 11: Botley Central Area	As with the above policy, Core Policy 11 is consistent with the NPPF in supporting the role that town centres play at the heart of local communities. It takes a positive approach to their growth, management and adaptation, supports the area to retain and enhance existing markets and promotes Botley centre's long-term vitality and viability.	<p>Botley Centre Supplementary Planning Document was adopted by Vale of White Horse District Council's Cabinet at its meeting on 18 January 2016.</p> <p>The policy's 'proposals for a comprehensive retail-led redevelopment and upgrading of Botley central area' have been recognised, i.e., West Way Square was completed earlier in 2021. Elms Parade remains and a new library, church and community hall were included in the redevelopment.</p>	Draft Oxfordshire Plan 2050: Policy option 24 - Town Centre Renewal; Policy option 29 - Urban Renewal	<p>This policy has been fulfilled via the completed West Way redevelopment.</p> <p>North Hinksey Parish Neighbourhood Plan was also 'made' by the Vale of White Horse Council meeting on 18 May 2021.</p>

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Core Policy 12: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area	The policy is consistent with the NPPF in identifying and protecting critical sites and routes in developing infrastructure. It also ensures the alignment of development with the involvement of transport infrastructure providers and operators (for example, Oxfordshire County Council).	<p>The delivery of infrastructure on the land safeguarded is currently under ongoing discussion with Oxfordshire County Council. A consultation regarding the Diamond Interchange at the A34 Lodge Hill Junction took place in Spring 2021, with plans for construction to take place from January 2022 and the end of Summer 2023.</p> <p>Safeguarded land for both the A34 Lodge Hill Interchange and Frilford Lights upgrades are supplemented by LPP2 Core Policy 12a. Please see page 42 of LPP2 and pages 30 and 31 of the LPP2 Appendices.</p>	<p>LPP2: Complemented by CP12 Core Policy 12a: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area</p> <p>Draft Oxfordshire Plan 2050: Policy option 21 - Strategic Infrastructure Priorities.</p>	<p>This policy is generally consistent with the NPPF. With Core Policy 12a in LPP2 carrying over the safeguarded land within this policy, a full review is not required until October 2024.</p> <p>The Joint Local Plan will consider the approach to safeguarding land for strategic highway improvements to 2041, with policies appropriately supported by robust and up to date evidence.</p>
Core Policy 13: Oxford Green Belt	This policy sets out specific criteria for inappropriate development in the Green Belt and exceptions for construction of new buildings in the Green Belt. It is generally consistent with the NPPF, which has recently added further 'exceptions' and	Core Policy 13 sets out that development can be permitted in a number of settlements within the Green Belt, where the development is within the existing built area of the settlement - and defines the types of development that are considered acceptable in the Green Belt.	LPP2: Supplemented by Core Policy 13a: Oxford Green Belt – the <i>'Green Belt boundary is amended to reflect the additional site</i>	The overall policy is generally consistent with the NPPF and the Joint Local Plan will consider the approach to Green Belt policies to 2041, appropriately supported by robust and up to date evidence.

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	'not inappropriate' Green Belt development types to observe.	The latest AMR confirms that: 'during 2019/20 there were 26 permissions granted for development in the Green Belt. These applications were all granted in line with Core Policy 13 and were considered to be appropriate development in the Green Belt. For example, the Council's planning policies and the government policies (set out within the National Planning Policy Framework)...allow for some forms of development to take place in the Green Belt.'	<i>allocation at Dalton Barracks</i> . Draft Oxfordshire Plan 2050: Policy Option 10 – Green Belt enhancement.	
Core Policy 14: Strategic Water Storage Reservoirs	Core Policy 14 safeguards land for a 'reservoir and ancillary works between the settlements of Drayton, East Hanney and Steventon, and to the north of Longworth'. (The safeguarded land at Longworth has since been removed). The policy is consistent with the NPPF, being a strategic policy making sufficient provision for water	The area safeguarded was updated in LPP2. Thames Water carried out a consultation on their Water Resources Management Plan in 2019, including the proposals for the reservoir. In March 2021, the Vale responded to a new Thames Water consultation, ' Water Resources South East - Developing our 'Best Value' multi-sector regional resilience plan ', in	LPP2: map superseded by Core Policy 14a Upper Thames Strategic Storage Reservoir. This updates the area safeguarded, so the map corresponding to 14a supersedes Core Policy 14: Upper Thames	With the policy's safeguarded area being updated by LPP2, a full review is not required until October 2024. However, in addressing a potential Nationally Significant Infrastructure Project (NSIP), Core Policy 14 is consistent with the NPPF and the Planning Act (2008). The Joint Local Plan will consider the approach to Strategic Water Storage Reservoirs to 2041, with policies appropriately

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	<p>supply/management and reflecting changes in the demand for land. It takes a proactive approach to mitigation, adaption and resilience to climate change and takes account of long-term implications for water supply.</p>	<p>which the reservoir was still listed as an option.</p> <p>The AMR confirms that ‘during 2019/20, there were three permissions granted in the safeguarded area. Two of these were variations to an extant permission which was previously considered not to significantly prejudice the implementation of the new reservoir. The other permission was a change of use permitted on a temporary basis for three years.’</p> <p>Regarding the reservoir at Longworth mentioned in the policy, LPP2 confirms that ‘land safeguarded for a proposed reservoir to the North of Longworth is omitted in Core Policy 14a: Upper Thames Strategic Storage Reservoir, following Thames Water’s Fine Screening Report Update (April 2017), which confirms that the site no longer needs to be safeguarded.’</p>	<p>Strategic Storage Reservoir’s map.</p> <p>Core Policy 14’s policy wording is still relevant.</p> <p>Draft Oxfordshire Plan 2050: Some links to Policy Option 03: Water Efficiency</p>	<p>supported by robust and up to date proposals and evidence.</p>

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Core Policy 15: Spatial Strategy for South-East Vale Sub-Area	Core Policy 15 sets out: the spatial strategy for the South-East Vale Sub-Area, including strategic sites to meet anticipated needs over the Plan period; the Council's housing requirement; and identifies employment land to support business and employment growth and productivity. The policy, focusing on housing and employment, is generally consistent with the NPPF, with a clear strategy for bringing a variety of sufficient land forward.	<p>The latest AMR states that:</p> <p>'there has been an overall shortfall in housing delivery in the South East Sub-Area of 1,951 dwellings. However, delivery has improved since the Adoption of the Part 1 Plan.'</p> <p>However, 'housing growth...is in line with the settlement hierarchy, with the majority of housing being delivered in the Market Town and Local Service Centre.'</p> <p>Additionally, LPP1's 'allocated sites in the Sub-Area are making good progress towards delivery with the majority of allocated sites having full or outline permission'.</p> <p>There is also confirmation that 'there is almost no housing being delivered in the open countryside which is in accordance with the policy.'</p> <p>With regard to employment, there had been 'sharp growth in the early</p>	<p>LPP2: Supplemented by Core Policy 15a: Additional Site Allocations for South-East Vale Sub-Area; Core Policy 15b: Harwell Campus Comprehensive Development Framework; Core Policy 15c: Grove Comprehensive Development Framework</p> <p>Draft Oxfordshire Plan 2050: Policy option 28 - Homes: How Many? Commitments and Locations</p>	<p>Notwithstanding the reference to the Science Vale ringfence, Core Policy 15 is generally consistent with the NPPF and local circumstances. As highlighted in the AMR it does not indicate that the policy needs updating at this time, as delivery has improved since LPP1 was adopted. The Joint Local Plan will consider the approach to future spatial strategies, with policies appropriately supported by robust and up to date evidence.</p> <p>Please see our commentary on Core Policy 5 in relation to the housing supply ringfence. As stated in that assessment the ringfence policy requires updating. Therefore, the aspects of Core Policy 15 that refer to this ringfence will also need to be reviewed.</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
		<p>years of the plan period, strongly influenced by the creation of the enterprise zones at Harwell and Milton. The significant increase during 2019/20 has come largely from permissions on the former Didcot A power station site, Harwell Campus and Grove Technology Park.'</p> <p>The amount of employment land permitted on strategic and allocated sites totalled 162 hectares from 2011-2021, well on the way to achieving the target of 208 hectares from 2011-2031.</p>		
Core Policy 16: Didcot A Power Station	This policy states the Council's support for the 'redevelopment of Didcot A power station to provide a high-quality mixed-use development' and provides the key design principles. It is consistent with the NPPF in encouraging a mixed-use scheme on a larger-scale site (e.g., to minimise journeys for employment, leisure, shopping etc) and	The latest AMR confirms that 'an application for a mixed-use development was given outline permission in February 2019 ...a number of conditions have been discharged; site clearance and preparatory works have been permitted and are underway'. The mixed-use includes the reservation of land for a link road and Science Bridge. It is a cross-boundary	LPP2: Supplemented by Core Policy 16B: Didcot Garden Town Draft Oxfordshire Plan 2050: Policy option 15 - High-Quality Design for New Development and Garden Town	This policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to the Didcot A Power Station site (and its relationship with Didcot Garden Town) to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	<p>identifying/protecting critical sites and routes (the Science Bridge and A4130 re-routing) in developing infrastructure.</p>	<p>application between Vale of White Horse and South Oxfordshire.</p> <p>The AMR also confirms, with regard to safeguarding land for the proposed route of the new Science Bridge and A4130 re-routing, 'no planning applications have been granted that would prejudice the construction or operation of this highway infrastructure'.</p> <p>The policy mentions Use Class B1 – this Use Class has now been revoked and replaced by Class E(g). Class D2, also mentioned, has been 'split out and replaced by the new Classes E(d) and F2(c-d) as well as several newly defined 'Sui Generis' uses' (see Planning Portal).</p>	<p>Standards for New Settlements</p>	
<p>Core Policy 17: Delivery of Strategic Highway Improvements within the</p>	<p>The policy is consistent with the NPPF in highlighting support and contributions to sites and routes critical to developing infrastructure, with the support and involvement of local highway authorities in the</p>	<p>In order to deliver the growth in the South East Vale Sub-Area and the wider Science Vale area, the Science Vale Area Strategy has identified highways infrastructure to mitigate the impact of the planned growth across Science Vale and</p>	<p>LPP2 Policies supplement Core Policy 17, such as the identification of the requirement for a strategic scheme to address the</p>	<p>The policy is generally consistent with the NPPF and the AMR highlights the majority of the identified infrastructure is progressing/complete. The Joint Local Plan will consider the approach to South-East Vale</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
South-East Vale Sub-Area	alignment of development patterns.	<p>secure the future economic viability of the area.</p> <p>The latest AMR provides a table confirming the majority of all identified infrastructure in Core Policy 17 is 'completed' or 'in progress'. The exception is 'Route improvements to the A417 between Wantage and Blewbury', with no current work underway.</p> <p>This policy cross-references with Core Policy 7: Providing Supporting Infrastructure and Services, which states, 'where viability constraints are demonstrated by evidence, the Council will: prioritise developer contributions for essential and then other infrastructure in line with the definitions as set out in paragraph 4.42 and the detail of requirements outlined in the IDP'.</p>	<p>congestion at Frilford Junction (A415/A338) and address air quality issues through the Marcham AQMA. See pages 12 and 16 of the LPP2 Appendices.</p> <p>Draft Oxfordshire Plan 2050: Policy option 21 - Strategic Infrastructure Priorities</p>	strategic highway improvements/schemes to 2041, with policies appropriately supported by robust and up to date evidence.
Core Policy 18: Safeguarding of Land for	The policy is consistent with the NPPF in supporting the provision of transport facilities in the area and infrastructure	Please note that this policy safeguards land supporting the identified transport schemes listed by Core Policies 17 and 19. Please	LPP2: Complemented by Core Policy 18a: Safeguarding of	With Core Policy 18a in LPP2 safeguarding the land related to this policy, as well as Core Policies 17 and 19, a full review is not required

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Transport Schemes in the South-East Vale Sub-Area	and wider development required to support their operation, expansion and contribution to the wider economy. It supports sites/routes critical to developing infrastructure and the alignment of development patterns.	see the sections referring to these Policies in this table, in the rows above and below. The AMR confirms that ‘there were no planning applications approved in 2019/20 that would prejudice the transport schemes.’	Land for Strategic Highway Improvements within the South-East Vale Sub-Area. Also see comments for Core Policy 17 within the ‘superseded or supplemented by LPP2’ column above. Draft Oxfordshire Plan 2050: Policy option 21 - Strategic Infrastructure Priorities; Policy option 17 - Towards a Net Zero Transport Network	until October 2024. This policy is consistent with the NPPF. The Joint Local Plan will consider the approach to safeguarding transport schemes to 2041, with policies appropriately supported by robust and up to date transport evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 19: Re-opening of Grove Railway Station	<p>The policy states the Council's support for the re-opening of Grove railway station and ensures that no planning applications that would prejudice the delivery of the station will be permitted on land identified for the development.</p> <p>It's focus on sustainable transport, development of infrastructure to widen transport choice and working with local highways authorities and other transport infrastructure providers is consistent with the NPPF.</p>	<p>The latest AMR states:</p> <p>'there have been no planning applications approved on the safeguarded land that would prejudice the railway station coming forward. Initial feasibility works are underway to inform the preferred location of the new railway station and the Local Transport Plan has identified the need to safeguard optional areas for the provision of a new station. Core Policy 18a and 19a in the Part 2 Plan update the Part 1 Plan policies relating to this.</p> <p>The Oxfordshire Rail Corridor Study 2020 (ORCS), commissioned by the Oxfordshire Growth Board and other partners, identified the need for a 70% increase in services as well as improved calling patterns and service coverage by 2028. The study supports the development of a new station at Grove by 2028 as part of a number of interventions needed.'</p>	<p>LPP2: Supplemented by Core Policy 19a: Re-opening of Grove Railway Station. This updates the area safeguarded, so the map correspond-ding to 19a supersedes 19.</p> <p>Draft Oxfordshire Plan 2050: Policy option 21 - Strategic Infrastructure Priorities</p>	<p>With the policy's safeguarded area being updated by LPP2, a full review is not required until the October 2024. However, it is consistent with the NPPF - and the evidence base and Oxfordshire Rail Corridor Study 2020 (ORCS) research supports the policy and its goals.</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
		<p>With regard to local circumstances, Vale of White Horse District Council passed a motion of support in relation to Grove station on 14 July 2021.</p>		
<p>Core Policy 20: Spatial Strategy for Western Vale Sub-Area</p>	<p>Core Policy 20 sets out the spatial strategy for the Western Vale Sub-Area, including strategic sites to meet anticipated needs over the plan period; addressing the Council's housing requirement; and identifying employment land to support business and employment growth and productivity. The policy, focusing on housing and employment, is generally consistent with the NPPF, with a clear strategy for bringing a variety of sufficient land forward.</p>	<p>In considering housing delivery in the sub-area against the housing requirement, the AMR confirms that the 'Western Vale has been meeting its housing requirement and has slightly over delivered in the previous plan years, with a surplus of 433 dwellings over the plan period.'</p> <p>In accordance with the settlement hierarchy, the majority of growth has been in the Market Town and Larger Villages, with a small amount of growth in the open countryside, 'which has largely come through the change of use and redevelopment of agricultural buildings, which is in accordance with the overall Development Plan'.</p>	<p>LPP2: Core Policy 20a: Housing Supply for Western Vale Sub-Area</p> <p>Draft Oxfordshire Plan 2050: Policy option 28 - Homes: How Many? Commitments and Locations; Policy option 22 - Supporting the Creation of Jobs</p>	<p>Core Policy 20 is generally consistent with the NPPF and local circumstances. As highlighted in the AMR, it does not indicate that the policy needs updating at this time, as, for example, this area has been meeting its housing requirement, growth has been in accordance with the overall Development Plan and employment land targets have been met.</p> <p>The Joint Local Plan will consider the approach to future spatial strategies, with policies appropriately supported by robust and up to date evidence.</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
		<p>Housing figures in the AMR show ‘substantial progress is made with strategic allocations in the Western Vale’; and with regard to employment land requirements, ‘the overall target for the plan period has been met, having permitted over the target land amount’.</p> <p>Core Policy 20a in LPP2 confirms ‘There is no contribution towards the agreed quantum of unmet housing need for Oxford City to be addressed within the Vale of White Horse within this Sub-Area and no additional site allocations are set out within the Part 2 plan’.</p>		
Core Policy 21: Safeguarding of Land for Strategic Highway Improvements within the Western Vale Sub-Area	The policy is consistent with the NPPF in identifying and protecting critical sites and routes in developing infrastructure. It also ensures alignment of development and the involvement of transport infrastructure providers and operators (for example, Oxfordshire County Council).	<p>The AMR confirms that ‘there have been no relevant planning applications permitted that would prejudice the delivery of key infrastructure projects on this land’.</p> <p>Improvements at the locations listed (Faringdon and Shrivenham) are secured for delivery through the S106/S278 legal agreements</p>	Draft Oxfordshire Plan 2050: Policy option 21 - Strategic Infrastructure Priorities	<p>This policy remains consistent with the NPPF.</p> <p>The Joint Local Plan will consider the approach to safeguarding /retaining safeguarded land for strategic highway improvements to 2041, with policies appropriately supported by robust and up to date evidence.</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
		<p>for permitted development in both locations. They will need to be safeguarded until the improvements are delivered. The Steeds Phase 1 and Fernham Fields developments secured contributions towards junction works. Both developments are nearing completion. The Steeds Phase 2 outline application was allowed on appeal in July. The S106 for this requires this developer to deliver the entirety of the junction works.</p>		
Core Policy 22: Housing Mix	<p>This policy is generally consistent with NPPF in setting out requirements for a mix of dwelling types, tenures and sizes on all new residential developments in accordance with the Strategic Housing Market Assessment.</p> <p>(Also see comments for Core Policy 24: Affordable Housing).</p>	<p>Looking at the Strategic Housing Market Assessment and the AMR, the AMR 'provides information for the combined market and affordable housing mix on sites given permission during 2019/20 where bed split data was available', and 'shows the number of 3 bed properties permitted being under the target and the number of 4 beds permitted being over the target. Permissions for 1 bed and 2 bed units are in line with SHMA target percentages'.</p>	Draft Oxfordshire Plan 2050: Policy option 30 - Affordable Homes	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to the housing mix to 2041, with policies appropriately supported by robust and up to date housing and objectively assessed need evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
		<p>As the SHMA was published in 2014, a review of this would be recommended.</p> <p>A further table shows the 'bed split of market housing permitted in 2019/20. 1 bed unit provision is over the SHMA target, with 3 bed units having under provision. Permissions for 2 bed and 4 bed units are in line with SHMA target percentages.'</p> <p>With regard to Affordable Housing, 'as of 31 March 2020, housing register demand was predominantly for 1 and 2 bed units. A lower proportion of 1 bed units and a higher proportion of 2 and 3 bed units were permitted during 2019/20 relative to this demand.'</p>		
Core Policy 23: Housing Density	This policy is generally consistent with the NPPF, where it: highlights a minimum density for new developments to make optimum use of land;	The AMR confirms that 'the average density on sites permitted in 2019/20 was 31 dwellings per hectare...above the minimum requirement - and shows that		The policy is overall consistent with the NPPF and the AMR evidence shows that efficient use of land is being achieved. The Joint Local Plan will consider the approach to

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	takes into account the character and setting of a place; aims to utilise opportunities from existing or proposed transport infrastructure; as well as having flexibility with regard to local circumstances.	efficient use of land is being achieved.'		housing density to 2041, with policies appropriately supported by robust and up to date evidence.
Core Policy 24: Affordable Housing	There has been a national policy development in 2021 with the announcement of a new form of Affordable Homes - First Homes. The introduction of these, through the Written Ministerial Statement means that 25% of all affordable housing delivered on a major development should be First Homes. The majority of Local Plans in the country will be yet to address these, so the Council has provided a First Homes Guidance Note to help housing providers and developers address this development.	The latest AMR confirms 'the 2014 SHMA assessed the affordable housing needs within the district and determined there was a need of 273 dwellings annually. To address this need, Core Policy 24 states that for housing developments providing a net gain of eleven dwellings or more the Council will seek 35% provision of affordable housing, subject to viability.' (Please see conclusion column regarding the threshold of 11 dwellings). The AMR continues 'Core Policy 24 also states that the affordable housing provided should be split into rent (either social or affordable) and intermediate, with a	LPP2: Supplemented by: Policy 1: Self and Custom Build and Development Policy 2: Space Standards LPP1 link to Core Policy 25: Rural Exception Sites Draft Oxfordshire Plan 2050: Policy Option 30 - Affordable Homes	The policy's overall approach to affordable housing is largely consistent with the NPPF and the First Homes Guidance Note is a useful interim tool for the use of providers and developers. The Joint Local Plan will consider the approach to affordable housing to 2041, with policies appropriately supported by robust and up to date evidence regarding need and viability to ensure targets are deliverable. The Joint Local Plan would also enable LPP1's reference to a 'net gain of eleven or more dwellings' to be updated, as the NPPF, regarding major development, has been amended since the plan was

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	<p>This overall policy is generally consistent with the NPPF in setting out the Council's requirements, including contributions expected, for affordable housing provision on new developments. It also addresses the levels and types of affordable housing provision required to ensure sufficient provision. LPP1 used Strategic Housing Market Assessment data to specify the type of affordable housing required for different groups in the community.</p>	<p>75:25 split respectively'. The AMR's evidence tables 'show that delivery is generally in accordance with these targets over the plan period. Against the target of 273 dwellings as put forward by the SHMA, the district has exceeded the target for the past five years.'</p>		<p>adopted, to 'development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more'.</p> <p>The Council's Local Development Scheme has also committed to producing an Affordable Housing SPD in the next year.</p>
<p>Core Policy 25: Rural Exception Sites</p>	<p>This policy is generally consistent with the NPPF, supporting opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, taking into account local circumstances and ensuring schemes are consistent with NPPF Green Belt policy.</p>	<p>The AMR confirms there were no rural exception sites permitted during 2019/20, however the policy continues to positively support rural exception sites.</p>	<p>LPP2: Links to Core Policies 13: Green Belt and 42: Flood Risk.</p>	<p>The policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to rural exception sites and entry-level exception sites to 2041, with policies appropriately supported by robust and up to date evidence.</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	(Also see comments for Core Policy 24: Affordable Housing).			
Core Policy 26: Accommodating Current and Future Needs of the Ageing Population	The policy is generally consistent with the NPPF, taking into account needs of different groups in the community, (including older people and people with disabilities) and supports specialist or purpose-built accommodation for people with specific needs. It also addresses the needs of people with disabilities and reduced mobility in relation to transport accessibility.	<p>The AMR confirms the current strategic allocations that are providing homes for an ageing population, at Grove Airfield, Crab Hill, North of Abingdon-on-Thames, Land South of Park Road - Faringdon, Great Western Park and Valley Park. The policy and supporting text have, as recommended by the PPG, used projections of population and households by age group and explains how the Council will consider proposals for the different types of housing likely to be required.</p> <p>The Council's Housing Delivery Strategy was published in 2018, highlighting evidence of a need for expansion of specialist housing for older people and housing with care to help older people remain independent.</p>	<p>LPP2: Supplemented by Development Policy 2: Space Standards; and Development Policy 4: Residential Annexes</p> <p>Draft Oxfordshire Plan 2050: Policy 31: Specialist Housing Needs</p>	The policy is generally consistent with the NPPF and PPG. The Joint Local Plan will consider the approach to accommodating current and future needs of the ageing population to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 27: Meeting the housing needs of Gypsies, Travellers and Travelling Show People	This policy is consistent with the updated NPPF – it does not include any changes in relation to accommodation needs for Gypsies, Travellers and Show People. It is also consistent with the Government’s Planning Policy for Traveller Sites .	The AMR confirms that during 2019/20, no permissions were granted for gypsies and travellers. However, in 2017, the Council produced an updated joint Gypsy, Traveller and Travelling Show People Accommodation Assessment with Cherwell District Council, Oxford City Council and South Oxfordshire District Council. This identified that only one new pitch is required in the later part of the plan period (2027-2031). The Council is therefore currently meeting its requirements and future planning applications will continue to be considered against the criteria set out in Core Policy 27.	Draft Oxfordshire Plan 2050: Policy option 32 - Gypsies, Travellers and Travelling Show People	This policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to Gypsies, Travellers, Travelling Show People and additionally Boat Dwellers to 2041, with policies appropriately supported by robust and up to date evidence.
Core Policy 28: New Employment Development on Unallocated Sites	This policy is generally consistent with the NPPF in making sufficient provision for employment, specifically considering new employment development at unallocated sites. It supports a prosperous rural economy, enabling building conversion for rural business, it promotes	This policy supports Core Policy 6: Meeting Business and Employment Needs, as confirmed by the AMR, ‘by supporting appropriate B-Class [and what is now E-class] employment development on unallocated sites across the district. During 2019/20 there was a total of 4.45 hectares of land permitted to provide employment	LPP2: Supplemented by Development Policy 12: Rural Diversification and Equestrian Development Links with Core Policy 6: Meeting	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to new employment development on unallocated sites, and business parks, to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	sustainable transport, and, in terms of rural development, is sensitive to local / landscape character.	<p>uses on unallocated sites. This is a positive increase to support sustainable growth.'</p> <p>The policy mentions Use Class B1 (business) – this Use Class has now been revoked and replaced by Class E(g) (offices, research and development, industrial processes). Use Classes B2 (general industrial) and B8 (storage or distribution) remain valid (Planning Portal).</p>	<p>Business and Employment Needs</p> <p>Draft Oxfordshire Plan 2050: Policy option 22 - Supporting the Creation of Jobs</p>	
Core Policy 29: Change of Use of Existing Employment Land and Premises	This policy, together with the sub-area strategies, is consistent with the NPPF in setting out a clear economic vision and strategy and providing flexibility related to changes in economic circumstances. In highlighting mixed-use development, it is also consistent in taking a positive approach to applications for alternative uses of land currently developed but not allocated for a specific purpose.	The AMR confirms that 'in 2019/20 there was 1.21 hectares of employment land given permission to change its use. This is less than the amount of land permitted for new employment uses. This shows that overall provision of employment land is increasing in line with the policy...of the 1.21 hectares of employment land lost, 0.97 hectares of this was to provide new homes. None of these changes were through Permitted Development rights, where CP29 does not come into effect.'	Draft Oxfordshire Plan 2050: Policy option 22 - Supporting the Creation of Jobs	This policy is generally consistent with national policy. The Joint Local Plan will consider the approach to change of use of existing employment land to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 30: Further and Higher Education	This policy is generally consistent with the NPPF in setting the strategy for the pattern, scale and sufficient provision of further and higher education facilities.	<p>The AMR sets out the 'new education facilities planned for the district relating to new housing developments' (confirmed in Oxfordshire County Council's Pupil Place Plan 2019-2023) and confirms that there were three applications approved in 2019/20 for extending existing education facilities in the district.</p> <p>The Council continues to work positively with Oxfordshire County Council, as the Education Authority.</p>	Draft Oxfordshire Plan 2050: Policy option 27 - Meeting Skills and Education Needs	This policy is generally consistent with national policy. The Joint Local Plan will consider the approach to further and higher education to 2041, with policies appropriately supported by robust and up to date evidence.
Core Policy 31: Development to Support the Visitor Economy	This policy is consistent with the NPPF in promoting town and service centre vitality, making sufficient provision for leisure (and business facilities) to support the visitor economy, enabling rural tourism and leisure developments that respect the character of the countryside. It supports a prosperous rural economy through diversification of	The AMR positively confirms that 'during 2019/20 there were 14 permissions approved which contribute to the visitor economy. These include a narrow-gauge railway near Wantage; part of a town centre regeneration scheme in Faringdon; hotel and service areas in Buckland and Milton; and education and visitor centres in Swinford and Watchfield'.	<p>LPP2: Supplemented by Development Policy 35: New Countryside Recreation Facilities</p> <p>Draft Oxfordshire Plan 2050: Policy Option 25 - Visitor Economy</p>	<p>The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to development to support the visitor economy to 2041, with policies appropriately supported by robust and up to date evidence.</p> <p>Also see notes on Core Policies 31 and 32 – having close links to this policy in relation to visitors, town centres and retail.</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	agricultural and other land-based rural businesses.			
Core Policy 32: Retail Development and other Main Town Centre Uses	The policy is generally consistent with the NPPF (particularly Section 7). It takes a positive approach to town centre growth, management and adaptation. In conjunction with the adopted policies maps, the policy defines the extent of town centres/primary shopping areas and makes clear the range of uses permitted in such locations, as part of a positive strategy for their future.	There were changes to the Use Classes Order in 2020 – planning permission is no longer required for a change of use from retail to a number of other commercial/service uses (including offices. The policy mentions retail Class A use – this Use Class has now been revoked and replaced by Class E (a,b,c) and also Sui Generis.	LPP2: Complemented by Development Policy 13: Change of Use of Retail Units to Other Uses (includes Development Policies 13a-e - 13a: Primary Shopping Frontages; 13b: Secondary Shopping Frontages; 13c: Other Town Centre Uses; 13d: Faringdon Town Centre; and 13e: Local Shopping Centres Draft Oxfordshire Plan 2050: Policy Option 24 – Town Centre Renewal	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to retail development and other main town centres uses to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 33: Promoting Sustainable Transport and Accessibility	This policy is generally consistent with the NPPF in addressing impacts of development on transport networks, drawing on sustainable opportunities from existing/proposed infrastructure, avoiding and mitigating any adverse effects and remaining sensitive to local character/design. The highlighting of work with OCC shows strategies of support for sustainable transport/development patterns are aligned.	<p>The latest AMR confirms that:</p> <p>‘a key indicator for this policy is the change in average journey times, on areas that are monitored by the local Highways Authority. There has been no updated information on average journey times relating to the district during 2019/20’.</p> <p>Regarding ‘key transport infrastructure projects in the district - a number of these projects include sustainable transport measures and will support the planned housing and economic growth in the district’.</p> <p>The AMR’s Figure 5 ‘shows the number of road traffic accidents in Oxfordshire from 2013 to 2019, the latest available data. Statistics are not available for the district. The general trend shows a decrease year on year for the number of total accidents and slight accidents’.</p>	<p>LPP2: Supplemented by LPP2 Development Policies 16-19.</p> <p>Draft Oxfordshire Plan 2050: Policy option 17 - Towards a Net Zero Transport Network; Policy option 18 - Sustainable Transport in New Development; Policy Option 19 - Supporting Sustainable Freight Management; Policy option 21 - Strategic Infrastructure Priorities</p>	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach going forward to promoting sustainable transport and accessibility, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 34: A34 Strategy	This policy is generally consistent with the NPPF, where it refers to the active involvement of local highways authorities in developing and implementing a 'Route Based Strategy for the A34', protecting a strategic route and in turn reducing consequential congestion and aligning development patterns. In aiming to develop an air quality monitoring framework it is identifying and assessing the environmental impacts of traffic and transport infrastructure. The policy also takes into account the PPG guidance regarding 'air quality monitoring'.	<p>The AMR confirms that Highways England is exploring opportunities to reduce congestion and improve safety on the A34 between the M4 and M40.</p> <p>The draft Oxfordshire Infrastructure Strategy - OXIS explains that 'Highways England was developing a route-based strategy linking Southampton to the East Midlands which included improvements to the A34 and the development of an Oxford to Cambridge expressway; which has seen been cancelled.'</p>	<p>Draft Oxfordshire Plan 2050: Policy Option 21: Strategic Infrastructure Priorities; Policy Option 12 - Air Quality; Policy Option 19 - Supporting Sustainable Freight Management.</p> <p>Supplemented by LPP2 Development Policy 19: Lorries and Roadside Services</p>	Core Policy 34 is consistent with the NPPF. The Joint Local Plan will provide the opportunity to ensure A34 policies reflect the latest in terms of the previously referenced 'Route Based Strategy' and ensure any other new or specific references are incorporated, where not already referenced by other policy.
Core Policy 35: Promoting Public Transport, Cycling and Walking	This policy is generally consistent with the NPPF, in pursuing the promotion of walking and cycling and ensuring accessibility to cycling routes/public transport through design. It is also consistent in requiring	Since the adoption of LPP1 in 2016, policy support for sustainable transport provision has received greater focus and attributed greater weight. Travel plans will ensure residents of new developments are aware of sustainable transport	<p>Supplemented by LPP2 Development Policies 16-19.</p> <p>Draft Oxfordshire Plan 2050: Policy option 18 - Sustainable</p>	This policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to promoting public transport, cycling and walking to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	Transport Assessment/Travel Plans for major development and generally ensuring significant development is situated in sustainable locations.	options available to them and encourage them to use these. The AMR confirms 'Major developments are required to be supported by a Transport Assessment and Travel Plan, in accordance with Oxfordshire County Council guidance. During 2019/20, eight out of twelve permissions granted for major developments were supported by Travel Plans or with conditions requiring Travel Plans to be produced in line with the guidance'.	Transport in New Development	
Core Policy 36: Electronic Communications	This policy is consistent with NPPF Section 10 – Supporting High Quality Communications, in promoting expansion of electronic communications networks through 'faster, more reliable and more comprehensive coverage'.	The latest AMR confirms that 'during 2019/20 there were no enforcement cases relating to lack of provision of communication infrastructure.'	Draft Oxfordshire Plan 2050: Policy Option 20 - Digital Infrastructure	This policy is generally consistent with the NPPF - the Joint Local Plan will consider the approach to electronic communications, digital infrastructure and mobile technology to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 37: Design and Local Distinctiveness	This policy is overall generally consistent with the NPPF and its design section. It sets out a clear vision and expectations, is sympathetic to local character and history and promotes taking account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. The combination of the strategic design Core Policies 37 and 38 set an overall strategy for the pattern, scale and design quality of places.	This policy is generally working well - the AMR reports that during 2019/20, only one application was 'permitted contrary to the advice of urban design officers. Most of the urban design concerns were satisfied by amendments and additional documents submitted during the application process'. This may be of note to determining future similar applications. The Council's new Joint Design Guide SPD will be going out to public consultation in late 2021.	Draft Oxfordshire Plan 2050: Policy Option 15 - High-Quality Design for New Development and Garden Town Standards for New Settlements	This policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to design (and inclusion of trees) and local distinctiveness to 2041, with policies appropriately supported by robust and up to date evidence.
Core Policy 38: Design Strategies for Strategic and Major Development Sites	The combination of the strategic design Core Policies 37 and 38 set out an overall strategy for the pattern, scale and design quality of places in the Vale. As with CP37 above, this policy is generally consistent with the NPPF and helpfully highlights that development proposals ensure places are safe, inclusive and accessible and promote health	The AMR indicates that this policy is working well, particularly the request for housing allocations and major development sites to be accompanied by a site-wide design strategy. The AMR confirms that 'of the 12 major sites approved in 2019/20, 11 had a Design and Access Statement and 5 had a Masterplan. In practice, the Design and Access Statement and application plans often contain the	Draft Oxfordshire Plan 2050: Policy Option 15 - High-Quality Design for New Development and Garden Town Standards for New Settlements; Policy Option 16 - Leisure, Recreation, Community and	This policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to design strategies for strategic/major development sites to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	and well-being, with high standards of amenity for existing and future users.	information specified for the masterplan in Core Policy 38. The permission without a Design and Access Statement was for the conversion of an office building to residential use through Permitted Development.'	Open Space Facilities	
Core Policy 39: The Historic Environment	<p>Core Policy 39 is generally consistent with the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990, in setting out how the Council will seek to protect and enhance the historic environment in the district. It also emphasizes the conservation of heritage assets and their setting in a manner appropriate to their significance.</p> <p>The National Design Guide was published in 2019 and Planning Practice Guidance regarding the historic environment was also updated in 2019. The policy does not make reference to the use of</p>	<p>The latest AMR confirms that: 'currently in the Vale of White Horse there are 7 sites on Historic England's 'At Risk' register' and there are 3 new Conservation Area Character Appraisals in preparation. Currently there are no heritage partnership agreements in place in the district.</p> <p>A key indicator for Core Policy 39 is the number of planning permissions granted contrary to technical advice. No permissions were granted in 2019/20 contrary to conservation officers' advice.</p>	<p>LPP2: Complemented by Development Policy 36: Heritage Assets</p> <p>Draft Oxfordshire Plan 2050: Policy Option 06 - Protection and Enhancement of Historic Environment</p>	<p>This policy is generally consistent with the NPPF - please note this policy is also complemented by Development Policy 36 in LPP2. A DP36 review, and therefore the 'Heritage Assets' aspect to both CP39 and DP36 policies, is not required until 2023.</p>

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	the Guide; this could be addressed in the Joint Local Plan.			
Core Policy 40: Sustainable Design and Construction	This policy is generally consistent with the NPPF, including the presumption in favour of sustainable development. It provides measures to address climate change mitigation and adaptation and takes a proactive approach to this. Its criterion takes into account design measures in all new development, to combat the effects of changing weather patterns, in line with the provisions and objectives of the Climate Change Act 2008.	<p>Responding to climate change is one of the Local Plan's strategic objectives and Vale of White Horse District Council declared a climate emergency in February 2019. The AMR confirms that 'in 2019/20 there were 51 applications where adaptation and design methods were taken into account in line with Core Policy 40.</p> <p>Currently data is unavailable on the water usage of new developments, however, data provided by the Consumer Council for Water in England and Wales shows that average water usage for a one-person household is 180 litres per day (66 cubic metres per year)'; so the Vale's requirement will have a positive impact.</p>	Draft Oxfordshire Plan 2050: Policy Option 01 - Sustainable Design and Construction; Policy Option 03 - Water Efficiency; Policy Option 11 - Water Quality; (some crossover) - Policy option 15 - High-Quality Design for New Development and Garden Town Standards for New Settlements	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to sustainable design and construction to 2041 (taking into account the council's climate action targets and any international commitments), with policies appropriately supported by robust and up to date evidence.
Core Policy 41: Renewable Energy	This policy is generally consistent with the NPPF, seeking to achieve national	Regional Renewable Energy Statistics are regularly published by the Government – using this, the	Draft Oxfordshire Plan 2050: Policy Option 02 - Energy;	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
(excluding wind energy)	aims to encourage renewable energy schemes and low carbon energy generation, while ensuring that adverse impacts are addressed satisfactorily' – e.g., protecting landscape and visual impacts.	<p>AMR has confirmed very positive increases in renewable energy installations, renewable energy capacity and renewable electricity generation from 2014 to 2019.</p> <p>In February 2019, Vale of White Horse District Council declared a climate emergency. The Council's climate action targets are to become:</p> <ul style="list-style-type: none"> - carbon neutral within our own operations by 2030, with an aim for a 75 per cent reduction in carbon emissions in our own operations by 2025 - a carbon neutral district by 2045, with an aim for a 75 per cent reduction in carbon emissions in the district by 2030 <p>Vale's Climate Emergency Advisory Committee (CEAC) first met in October 2019. Its role is to make recommendations to Cabinet on how Vale of White Horse District Council can reduce damage to the global and local environment through its policies.</p>	(some crossover - Policy Option 13 - Healthy Place Shaping and Impact Assessments)	approach to renewable energy / sources and carbon reduction to 2041 (taking into account the council's climate action targets and any international commitments), with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 42: Flood Risk	Core Policy 42 sets out the Council's approach to development and flood risk and is generally consistent with NPPF section 14. It highlights the sequential risk-based approach to the location of development, taking into account all sources of flood risk and current/future impacts of climate change. It also ensures flood risk is not increased elsewhere and highlights that developments should incorporate sustainable drainage systems.	Vale of White Horse's AMR does not identify any significant issues with the effectiveness of the policy: 'in the district, during 2019/20, there were five applications approved where the Environment Agency (EA) initially objected but were satisfied by additional information provided and conditions proposed during the application process.'	Draft Oxfordshire Plan 2050: Policy Option 04 - Flood Risk	Core Policy 42 is generally consistent with the NPPF. Local circumstances do not indicate that the policy requires updating. The Joint Local Plan will consider sustainable flood risk management approaches.
Core Policy 43: Natural Resources	This policy is generally consistent with the NPPF - highlighting effective use of land, using natural resources prudently, encouraging reuse of resources and minimising waste and pollution. It aims to shape places in order to contribute to reductions in greenhouse gas emissions and supports renewable energy.	Key points made in the latest AMR in relation to CP43 include: - no applications approved in the district contrary to Environment Agency advice on water quality grounds; - in 2019/20 there were significantly more applications approved on previously developed land than on greenfield land. However, a higher proportion of the land permitted	Policy Option 12 - Air Quality	This policy is still generally consistent with national policy and the Joint Local Plan will consider the approach to natural resources to 2041, with policies appropriately supported by robust and up to date evidence.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	<p>The policy is additionally consistent in encouraging the re-use of previously developed or brownfield land.</p>	<p>was on greenfield sites due to a small number of permissions relating to large greenfield sites allocated in the Local Plan; - during 2019/20 there were no applications granted contrary to the advice of technical officers regarding agricultural land; and - positive progress is being made in the Abingdon AQMA area, with work being undertaken to determine how the situations in Botley and Marcham can be improved. In Botley, additional monitoring is being undertaken and solutions being investigated; and in Marcham, Oxfordshire County Council is in the process of reviewing previous work associated with Marcham Bypass. The next steps will be to develop options to test what will be the best strategy to alleviate traffic issues and improve air quality within Marcham.</p>		
Core Policy 44: Landscape	This policy is generally consistent with Section 15 of the NPPF, supporting conservation and	The AMR states that 'during 2019/20 there were 40 permissions granted in the AONB. All of these were in line with Core Policy 44,	LPP2: Complemented by Development Policy 29:	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to landscape / landscape

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	enhancement of the natural environment (for example, the AONB). It protects (and supports enhancing of) valued landscapes, recognises the intrinsic character and beauty of the countryside and protects against noise, light and motion pollution. It includes an extensive list of features gaining protection from harmful development.	with the majority being within the Harwell Campus site or applications for redevelopment of sites and most of the remainder being small works, amendments or reserved matters to extant permissions.'	Settlement Character and Gaps Draft Oxfordshire Plan 2050: Policy Option 05 - Protection and Enhancement of Landscape Characters	character to 2041, with policies appropriately supported by robust and up to date evidence.
Core Policy 45: Green Infrastructure	This policy is consistent with the NPPF in seeking a 'net gain' in green infrastructure and planning in advance for it, so it is safe and accessible. It takes a strategic approach to maintaining and enhancing green infrastructure, as well as networks of habitats.	The South and Vale Green Infrastructure Strategy was published in 2017. The latest AMR confirms that 'during 2019/20 there were 29 permissions granted that took account of Core Policy 45'.	Draft Oxfordshire Plan 2050: Some crossover - Policy Option 13 - Healthy Place Shaping and Impact Assessments.	The policy is generally consistent with the NPPF and evidence/local circumstances do not indicate that the policy needs updating at this time. The Joint Local Plan will consider green infrastructure approaches to 2041. Joint Local Plan policies on green infrastructure will be able to reflect the expectations of the Environment Bill, that passed into law in November 2021.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
Core Policy 46: Conservation and Improvement of Biodiversity	Overall, this policy is consistent with the NPPF, where it aims to improve and protect biodiversity (by minimising impacts on it), as well as enhance it. The plan and this policy are consistent in setting out (via identification, mapping and safeguarding) sites of importance for biodiversity and local wildlife sites. However, the policy's provisions for biodiversity net gain are to seek opportunities for net gain, which is not consistent with mandatory 10% net gain introduced by the new Environment Act 2021.	The latest AMR confirms that 'the area of Local Wildlife sites has increased by 66.48 hectares since last year, increasing from 1,591.42 to 1657.9 hectares. Further information on the status of sites is available from the Thames Valley Environmental Records Centre (TVERC) and Natural England '. Additionally, it confirms 'no planning permissions were granted in 2019/20 contrary to consultee advice on the impact on SACs, in line with Core Policy 46', showing the policy is working well.	Draft Oxfordshire Plan 2050: Policy Option 07 - Nature Recovery; Policy Option 08 - Biodiversity Gain; Policy Option 09 - Natural Capital and Ecosystem Services	The overall policy is generally consistent with the NPPF. The Joint Local Plan will consider the approach to conservation and improvement of biodiversity to 2041, with policies appropriately supported by robust and up to date evidence. Joint Local Plan policies will be able to reflect the expectations of the Environment Bill, that passed into law in November 2021.
Core Policy 47: Delivery and Contingency	This policy, together with the Development Plan as a whole and its Annual Monitoring Report, are consistent with the requirement to monitor annually (highlighted in the Localism Act 2011 and subsequent Town and Country Planning (Local Planning)	The latest AMR was published in January 2021 and highlights ongoing progress and achievements of all Local Plan Part 1 policies.	LPP2: Core Policy 47a: Delivery and Contingency	This policy is consistent with national guidance.

Policy	Consistency with National Policy	Evidence and Change in Local Circumstances	Superseded or supplemented by LPP2? Linked draft Oxfordshire Plan 2050 policy?	Conclusion / RAG
	(England) Regulations 2012 via preparing and publishing an Authority Monitoring Report (Regulation 34).			

Assessment of Housing Requirement

To supplement the assessment against national policy in the NPPF, we have considered the further guidance in the PPG and used additional prompts from the Local Government Association’s Planning Advisory Service (PAS) “Local Plan Route Mapper” (October 2021) to assess the housing requirement element of Core Policy 4. The PPG outlines (in a series of bullet points in ID:61-065-20190723) a non-exclusive list of information which can be considered. The toolkit provides advice on the questions local authorities should ask themselves in reviewing whether policies in a local plan need updating. Since there is considerable overlap between the list and the questions, they have been considered together in this appendix.

The following provides the Council’s assessment against each of the criteria under NPPF Paragraph ID 61-065-20190723, shown in **bold**. Where relevant, we have used PAS Toolkit prompts, with these questions shown in *italic underlined* text.

Key:

NPPG Paragraph ID 61-065-20190723 Criteria

PAS toolkit Prompts

1) Consistency with national planning policy

Please see Policy CP4 in the LPP1 review table for this assessment.

2) Changes to local circumstances; such as a change in Local Housing Need

PAS toolkit prompt 1: Consider whether the local housing need figure, using the standard method as a starting point, has gone up significantly (compared against the adopted requirement in the local plan):

The housing requirement established in CP4 is 1,028 dpa, compared with a local housing need figure of 636 dpa, calculated using the standard methodology. This represents a drop in the annual requirement of 392 dpa or 38%. This does not suggest that the housing need has gone up significantly.

The PPG also gives one example of where local housing need “*will be considered to have changed significantly*” where the housing requirement is not based on the standard method, and that is where a plan has been adopted “*on the basis of a number that is significantly below the number generated using the standard method*” (ID:61-062-20190315). The PPG gives no guidance on the contrasting position of a number that is significantly higher than the standard method figure. In the absence of any specific guidance, the Council considers that whether this scenario would be a significant change is a matter for planning judgment, having regard to the particular circumstances of the case.

PAS toolkit prompt 2: Consider whether the local housing need figure has gone down significantly (compared against the adopted requirement in the local plan):

As set out above, the housing requirement in CP4 is 1,028 dpa, compared with the local housing need figure of 636 dpa. The local housing need assessment indicates that the minimum housing needs have dropped by around 38% compared with the adopted requirement, which is a significant change.

This difference is because the objectively assessed needs (OAN) contained within the Oxfordshire Strategic Housing Market Assessment (SHMA, 2014) that underpin LPP1 were prepared in line with the NPPF 2012. Since the adoption of the plan, national policies for calculating housing need and housing requirement have changed significantly. The standard method for calculating Local Housing Need does not consider the potential for employment growth in Oxfordshire in the same way that previous guidance allowed for, nor does it do the same for affordable housing needs. Furthermore, the SHMA was based on the 2011-based interim household projections while the standard method utilises the 2014-based projections. The 2011-based interim projections only gave household projections to 2021, while the 2014-based projections go to 2039.

Consequently, it is not possible to directly compare the outputs of the SHMA and those from the Standard Method. Current national guidance does allow for local authorities to make an uplift for their housing needs during plan-making where they believe needs may be higher than the standard method indicates (NPPG Housing and Economic Needs Assessments, Paragraph 010).

However, it is important to reiterate that the changes in national policies and guidance regarding housing requirement since the preparation of the Oxfordshire SHMA and adoption of LPP1 are significant. They were introduced by the Government following extensive consultation and in the wake of concerns about the reliability of the previous OAN methodology. The standard method was intended to ensure a more consistent approach. Employment growth and affordable housing need factors were included in the district's objectively assessed housing needs, and were not considered alongside other plan-making criteria (for example constraints such as infrastructure capacity, Green Belt and Areas of Outstanding Natural Beauty) before adding into a housing requirement.

Under current NPPF policy, a new local plan would be tested against different national policies and guidance from those in place at the time of LPP1. Combined with the 38% drop in need indicated by the local housing need assessment, this is a compelling justification that the housing requirement element of Core Policy 4 requires updating.

PAS toolkit prompt 3: Is there robust evidence to demonstrate that the current housing requirement is deliverable in terms of market capacity?

Paragraph 61 of the NPPF requires local planning authorities to consider market signals when assessing whether they should plan for an alternative approach to the standard method. The Council has reviewed its housing completions by year

since the start of the plan period (1 April 2011)⁴. Since this start date there have been fluctuations in housing completions. The housing requirement set out in Policy CP4 has been successfully matched with housing completions in 5 of the last 10 years. 4 of these 5 years of completions exceeding our requirement have all been since 2015/16⁵.

The latest evidence from 2020/21 shows a drop in completions. This is the only year since adoption where completions have not met the requirement. In this year, construction work was disrupted due to the coronavirus pandemic, plus potentially the materials and labour shortage. It is difficult to predict whether this will recover or be a longer-lived effect.

LPP1 identified a housing supply and trajectory that would build out over the 20-year plan period to 2031. There would not have been market capacity to deliver the entire housing requirement of 20,560 homes within the first years of the plan.

Over the plan period so far, more homes have been committed (allocations and planning permissions) than have been built (housing completions). However, there is always a lag between the council granting planning permission and a developer building out a site.

Within our trajectory there are significant allocations without detailed planning permission (such as Monks Farm (117 dwellings), Valley Park (4,254 dwellings), Northwest Valley Park (800 dwellings), Dalton Barracks (1,200 dwellings), Land east of Kingston Bagpuize with Southmoor (600 dwellings), and North West of Grove (400 dwellings) which will continue high delivery trends later in the plan period. These allocations and extant planning permissions⁶ will remain in place, regardless of the housing requirement.

The Oxfordshire Plan team has commissioned an Oxfordshire Growth Needs Assessment (OGNA) as part of the new evidence base for the Oxfordshire Plan. The OGNA estimates housing needs across the County (but does not give a district-by-district breakdown). The Oxfordshire Plan will provide housing requirements for each district, but these are unlikely to be published until mid-2022 when the Oxfordshire Plan undergoes a Regulation 19 consultation. It will then be subject to submission and an independent examination process. The OGNA notes that the county is characterised by “high housing costs and particular affordability pressures” (Section 4.5) and that if these are not addressed it could “hold back future economic growth potential” (Section 4.5). Similarly, job growth has outpaced housing growth between 2011 and 2018, leading to increased in-commuting in that period (Section 5.6).

Since the adoption of LPP1, it generally appears that market demand and market capacity has existed to meet the CP4 housing requirement of 1,221 dpa.

⁴ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/06/Vale-5YHLS-2021.pdf> (See Table 2)

⁵ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/06/Vale-5YHLS-2021.pdf> (See Table 2)

⁶ We currently forecast a deliverable supply of 7,363 homes, with 5,594 of these homes benefitting from a planning permission or resolution to grant planning permission (see 5YHLS Statement, Table 6)

However, in the last year 2020/21 market capacity has dipped due to the impacts of the coronavirus pandemic

Affordability remains an issue within the Vale of White Horse. At the start of the plan period, median house prices were around 7 times higher than median gross annual incomes. In 2016, when the plan was adopted, the ratio of median house prices to incomes was over 9. This climbed to 9.87 in 2018 and then declined to 8.94 in 2020.

Core Policy 24 of LPP1 requires a 35% contribution of affordable housing from all sites capable of delivering a net gain of 11 or more dwellings. Against a housing target of 1,026dpa as set out in Core Policy 4, this would result in an annual target of 359dpa. Since the adoption of the plan (2016/17) the Council has consistently delivered around this figure of affordable housing⁷:

- 2016/17 – 336 affordable units delivered
- 2017/18 – 311 affordable units delivered
- 2018/19 – 392 affordable units delivered
- 2019/20 – 353 affordable units delivered

As set out elsewhere in this assessment, the Council does not expect a reduction in the housing requirement in line with the standard method to affect either the overall supply of housing or the number of affordable units delivered. This is because the Council has already committed to delivering this level of growth through allocations in the development plan and through granting planning permissions. Therefore, the Council does not believe the overall supply of affordable housing would be affected.

3) Housing delivery test performance

The Vale of White Horse has performed strongly against Housing Delivery Test targets since their introduction. Results from previous years are as follows:

- 2020 – 208%
- 2019 – 236%
- 2018 – 334%

The HDT is assessed against the Council's local housing need calculated using the standard method plus agreed unmet housing need, rather than the higher annual requirement contained in the development plan. This follows advice in government's technical note regarding the HDT⁸. Consequently, a change in the housing requirement to the standard method would bring consistency with the HDT and is unlikely to affect the Council's performance against the HDT.

⁷ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/04/VoWH-AMR-2019-20.pdf>, table 22

⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953304/2020_HDT_technical_note.pdf, Paragraph 8

4) Whether the authority can demonstrate a 5-year supply of deliverable sites for housing

The Council published its most recent housing land supply report in June 2021, demonstrating a 5.04-year housing land supply. The Council can therefore demonstrate a five-year housing land supply, and has been able to do so since the adoption of LPP1 in 2016/17.

5) Whether issues have arisen that may impact on the deliverability of key site allocations

The economic uncertainty caused by Brexit and the Covid-19 Pandemic could affect delivery more generally across the Vale of White Horse. This was reflected in lower delivery of housing in 2020/21 when the Brexit transition period ended, and the height of Covid-19 restrictions were in place. The impact of these macro-economic effects will need to be considered through either the new Joint Local Plan or the Oxfordshire Plan 2050.

6) The authority's appeal performance

The latest government tables on appeal performance cover the 24 months ending December 2019. These show that the Council has seen 1.6% of its appeal decisions overturned at planning appeal. This figure drops to 0.8% when appeals relating to planning conditions are excluded⁹.

7) Success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report

Core Policy 4 is monitored against the following indicators¹⁰:

- Number of dwellings completed district wide
- Net number of dwellings current with permission
- Number of dwellings allocated through the Part 2 Plan and NDPs

The latest monitoring report identifies the total completions (as of 31 March 2020) in the district at 9,112 since the start of the plan period. This figure rose to 10,214 completions in March 2021¹¹. The Council can also demonstrate a five-year supply of housing sites, with its most recent land supply statement identifying 7,363 homes with a deliverable permission. The Council has also adopted its Local Plan Part 2, which made allocations for 2,420 homes. Overall, the Council's performance against its housing indicators has been strong. As set out elsewhere in this assessment, the Council does not expect a reduction in the housing

⁹ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#planning-performance-tables>, Table P152

¹⁰ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/04/VoWH-AMR-2019-20.pdf>, P.24

¹¹ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/06/Vale-5YHLS-2021.pdf>, Table 2

requirement in line with the standard method to affect the overall supply of housing. This is because the Council has already committed to delivering this level of growth through allocations in the development plan and through granting planning permissions.

8) The impact of changes to higher tier plans

There are no higher tier plans above LPP1. LPP2 sits alongside LPP1 as part of the development plan, and is considered in more detail in the point below.

9) Plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need

PAS toolkit prompt 6: whether formal agreements to meet unmet need from neighbouring authority areas are in place

The Vale of White Horse District Council has agreed to take on unmet from Oxford City Council, which was planned for in Local Plan Part 2 Core Policy 4a.

Local Plan Part 2 is less than 5 years old so Core Policy 4a is not subject to this local plan review. Therefore, it is necessary to make an adjustment to the local housing need to add the 183 dwellings per annum set out in Core Policy 4a to accommodate Oxford's unmet need. Such an adjustment is not directly covered by advice in the NPPF, NPPG or the Housing Delivery Test Measurement Rule Book, but the additional requirement in Core Policy 4a is less than 5 years old. There is nothing to indicate that the unmet need it addresses have fallen away. Indeed, the examination and adoption of the Oxford Local Plan in 2020 indicated this unmet need still existed.

Site allocations and planning permissions are in place to address the unmet need from Oxford, as set out in Core Policy 4a of Local Plan Part 2. The presence of an agreement on unmet need is not material to this assessment of CP4 because that unmet need is secured separately in CP4a and is unaffected by this review.

10) Significant economic changes that may impact on viability

Since the adoption of the plan in 2016, the UK has been affected by the impacts of both Brexit and the Covid-19 pandemic. The Council is not aware of any specific viability challenges to development in the area, and none were revealed in the viability testing of the new Vale Community Infrastructure Levy Charging Schedule during the summer of 2021, although housing delivery did slow in 2020 when both the Brexit transition period ended, and the pandemic restrictions were extensive.

11) Whether any new social, environmental, or economic priorities may have arisen

Since the adoption of the plan the Council has declared a Climate Emergency (February 2019)¹². The Council has also published a new Corporate Plan (2020-24) committing the Council to being carbon neutral in its own operations by 2030, and to be a carbon neutral district by 2045¹³.

PAS toolkit prompt 4: Whether the housing requirement supports a growth strategy such as Housing Deals

Since the adoption of the plan, the Vale of White Horse District Council signed the Oxfordshire Housing and Growth Deal (2018). This deal provides funding to the Oxfordshire authorities to deliver infrastructure that supports accelerated housing growth. In the Vale of White Horse, the Growth Deal funding is helping to deliver the following infrastructure projects:

- Frilford and Marcham bypass
- Relief to Rowstock
- Milton Enterprise Pedestrian and Cycle Bridge
- Faringdon Community College
- Wantage Eastern Link Road
- Jubilee Way Roundabout and Didcot Central Corridor

Collectively, these infrastructure schemes are currently forecasted to help accelerate around 1,900 homes in the Vale of White Horse between 1 April 2018 and 31 March 2025. The Growth Deal does not “unlock” housing, i.e., make these sites acceptable in principle, but rather seeks to accelerate housing delivery from later in the plan period to 2025.

The housing growth supported by Growth Deal funding is still supported by the local planning authority, and permissions and allocations will remain within the land supply and spatial strategy to deliver this. All the housing sites associated with these infrastructure schemes have planning permission or are under construction.

Switching to the local housing need figure for monitoring purposes does not mean the Council withdrawing its support for the Growth Deal or the agreed housing delivery. The Council’s Local Plans Part 1 and Part 2 both contain the supply required to meet the Growth Deal in full, i.e., the Vale’s agreed share of the 100,000 homes to be delivered by 2031.

The Housing and Growth Deal is subject to its own independent monitoring process, with a dedicated team in place to ensure that planning permissions and

¹² <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2020/11/VOWH-Corporate-Plan-2020-2024.pdf>

¹³ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2020/11/VOWH-Corporate-Plan-2020-2024.pdf>

completions countywide align with the Deal's expectations. This process has been in place since 2018 when the Deal was signed.

PAS toolkit prompt 5: whether the housing requirement supports new strategic infrastructure investment

In addition to the Housing and Growth Deal discussed under prompt 4, government considers the Oxford-Cambridge Arc as a “national economic priority area”¹⁴. In February 2021, the government launched an “introduction to the spatial framework” setting out their core principles for developing an overarching planning strategy for the Arc. An element of this will include planning for the “right level of growth in the Arc”¹⁵. Housing requirement is a matter that the government acknowledges will be affected by forthcoming changes to the planning system that were consulted upon in 2020¹⁶.

Between July and October 2021 government ran a consultation on the vision for the Arc. It explored the issues relating to housing across the Arc and how the strategy could influence its delivery. It sets out government’s aspiration to set policies that would enable “new development to come forward at the scale and speed needed, in sustainable locations, with a focus on brownfield redevelopment”.¹⁷ Currently however there are no government housing targets for the level of housing needed in the Arc; neither at a strategic scale or on a district-by-district basis.

A switch in the housing requirement for monitoring purposes to the Standard Method in the Vale of White Horse is unlikely to affect the strategy for the Oxford to Cambridge Arc, which is at an early stage of preparation. Once the Arc Spatial Framework is further developed, the Oxfordshire Plan 2050 will be in a position to reflect on the latest evidence or strategy for the Oxford to Cambridge Arc to ensure that an appropriate housing requirement is allocated to each local authority. These numbers will feed into the process for determining a new housing requirement for the Joint Local Plan. Therefore, although there is an aspiration from government to support development across the Arc, there has been no assessment or strategy to date setting out how many homes per local authority would be needed.

¹⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962455/Spatial_framework_policy_paper.pdf, Paragraph 1.9

¹⁵ Ibid, Paragraph 2.10

¹⁶ Ibid, Paragraph 2.13

¹⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1003974/Creating_a_vision_for_the_Oxford-Cambridge_Arc.pdf, Paragraph 5.6

Summary

The PPG and PAS toolkit prompts show there is some justification for continuing to use the housing requirement of 1,028 dpa contained within Core Policy 4. On market capacity (prompt 3), past delivery rates show that the market can deliver this figure, although the last year signals a drop resulting from the pandemic and potentially other construction industry challenges which introduced some uncertainty. Latest evidence in the Oxfordshire Growth Needs Assessment indicates demand remains high, although this assessment does not identify a district level requirement and is still to be subject to scrutiny through public consultation and examination to determine which of its three growth scenarios is the most appropriate.

The presence of a Growth Deal in Oxfordshire, signed in 2018, also indicates that housing requirement was higher than that identified by the local housing needs. However, the councils in Oxfordshire have already secured in their adopted plans enough housing to meet the Deal in full. The accelerated housing in the Vale associated with the Deal's infrastructure schemes all have planning permission or are already under construction. On prompt 4 there is therefore no impact on the Growth Deal if the policy is recognised to be in need of updating. Similarly, there is an agreement in place on unmet need (prompt 5) but this is addressed and secured separately in CP4a so there is no impact if the housing requirement element of CP4 is out of date.

The Vale of White Horse sits within the Oxford to Cambridge Arc, an area where government is setting out a strategy to support sustainable economic growth. However, government is still at the early stages of setting out its ambitions and strategy for the Arc and has not indicated any district-specific housing requirements within the area.

However, the 38% drop between the adopted housing requirement and the current local housing need figure is significant, as is the change in approach for calculating housing needs and requirements in the NPPF and NPPG since the adoption of LPP1 (prompts 1 and 2). Taking due regard to all of the factors together, on balance, the Council concludes that the scale of divergence is decisive in determining whether the housing requirement in CP4 is a reliable reflection of current housing needs. The housing requirement should no longer be regarded as an up-to-date reflection of needs when it is so far removed from the current local housing need figure.

The housing requirement in Core Policy 4 therefore requires updating. For the purposes of monitoring and housing land supply, the annual housing requirement will be 819 dwellings per annum. This comprises 636 dwellings per annum calculated using the standard methodology, plus 183 dwellings per annum from Core Policy 4a of LPP2.