

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO  
SOUTH OXFORDSHIRE LOCAL PLAN 2034  
PROPOSED SUBMISSION (Final Publication Version 2<sup>nd</sup>)  
Comments close 18<sup>th</sup> February 2019**

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**Introduction**

1. Oxfordshire County Council welcomes the publication of this second South Oxfordshire Proposed Submission Local Plan. We commented on the first Proposed Submission Local Plan in November 2017 and we are pleased that we have had the opportunity since to work with the District Council and see an improved revised document produced.
2. The County Council notes that many of the issues we raised in November 2017 have been addressed, but is raising various issues of soundness as set out in this narrative and in the table attached. In making these comments we have had regard to paragraph 182 of the National Planning Policy Framework (NPPF) which requires plans to be positively prepared, justified, effective and consistent with national policy.
3. Throughout its evolution, South Oxfordshire District Council was challenged to develop a robust Local Plan – one that provided:
  - a strong narrative about what it was trying to achieve, delivering Plan-led and infrastructure supported development;
  - a more robust transport network and allocated development which could contribute positively to that network and to the local and county economy;
  - a clear strategy for addressing Oxford's unmet housing need and other cross-boundary issues, involving greater collaboration and compromise;
  - support for Oxfordshire's Housing and Growth Deal and support for our Housing Infrastructure Bid which requires a robust and evidenced plan for growth to underpin the significant financial ask of Government.
4. As the responsible authority for highways, education and social care, we recognise this Local Plan attempts to tackle not just the infrastructure deficit in terms of roads, but also helps to meet the need for more school places and provide for those with housing needs, including those people whose housing needs are specifically related to Oxford.
5. We are pleased that the Local Plan now better demonstrates that it fits with Oxfordshire-wide strategies including the Strategic Economic Plan, Local Transport Plan 4 'Connecting Oxfordshire', the Oxfordshire Infrastructure Strategy and the emerging Local Industrial Strategy.

6. The County Council seeks to participate in Examination hearings for this Plan. Our comments follow comments lodged on the Proposed Submission Oxford Local Plan 2036 in December 2018 and we would be amenable to attending joint hearings with Oxford City if both Local Plans proceed on similar timeframes and there are overlapping issues.

#### **Didcot Garden Town Housing Infrastructure Bid**

7. Oxfordshire County Council is supportive of how the Local Plan looks to strengthen Science Vale and access to Didcot through strategic sites that can contribute to the local and national economy and meet housing need. This in turn can contribute to the major infrastructure investment needed for this part of the county. Without critical national funding to match this local ambition, the Local Plan will struggle to meet its vision and the county will suffer. The County Council will maintain objections as Highways Authority where necessary, and we note that the Planning Inspectorate has recently supported decisions refusing planning applications for small developments on sites in Sutton Courtenay regarded as having a severe impact on the highways network in the absence of additional infrastructure. The Housing Infrastructure Fund bid for Didcot Garden Town is essential to holding this Local Plan together. The Outline Business Case was submitted on 25<sup>th</sup> January 2019 ahead of the submission deadline, and Oxfordshire County Council is working on the assumption that a funding decision will be made in time to give critical support during the Examination of this Plan – without this we will need to revisit our assumptions and it may be that the Plan will need to be amended.

Soundness Issue: A successful Housing Infrastructure Fund bid for Didcot Garden Town is required to enable significant numbers of further housing in South Oxfordshire. The outcome of the bid, which was submitted in January 2019, is at present not known.

#### **Oxfordshire Housing and Growth Deal**

8. It is a requirement of the Oxfordshire Housing and Growth Deal that the current suite of Local Plans are submitted by 1<sup>st</sup> April 2019. We are pleased that South Oxfordshire District Council is on course to meet this target. We recommend that the District consider the matters raised in our comments and submits the Local Plan to the Planning Inspectorate along with proposed changes it considers appropriate, as allowed for in the regulations.
9. There are other commitments from the Oxfordshire authorities in the Housing and Growth Deal, most notably a commitment to produce a Joint Statutory Spatial Plan. Work on the Oxfordshire Plan 2050 is well underway and consultation commenced on an initial Regulation 18 document on 11<sup>th</sup> February 2019.
10. The government has committed £150m for infrastructure, £60m for affordable housing and £5m capacity funding through the Housing and Growth Deal. Oxfordshire County Council along with the District and City councils have produced a 5 year programme as to how the money will be spent in agreement with the Ministry of Housing, Communities and Local Government (MHCLG). Some of the £150m for infrastructure will be needed for South Oxfordshire schemes which are necessary for the development envisaged in this Local Plan.
11. As the commitments of the Housing and Growth Deal are progressing in accordance with the timeframes, the critical funding from government should be provided, therefore no soundness issue is raised.

## Developer Funding

12. Developers need to play their part in funding infrastructure. The County Council can request contributions under Section 106 of the Town and Country Planning Act 1990 and Section 278 of the Highways Act 1980 in accordance with tests set out in the National Planning Policy Framework (NPPF) and regulations. In addition, there can be funds obtained through the Community Infrastructure Levy (CIL), although to date the County Council has not received any such funds, and the proportion which the County Council can call on in future is limited in accordance with South Oxfordshire's adopted CIL spending strategy.
13. We recognise that the Local Plan must set out its funding strategy having regard to viability and the District Council has produced evidence in respect of that including the Financial Viability Assessment Report dated December 2018. That document indicates that changes to the current CIL and Regulation 123 list are envisaged and we are aware that South Oxfordshire District Council intends to review their CIL. At present, it remains the case that S106 contributions to infrastructure will be restricted. We acknowledge that the government has recently consulted on changes to CIL, but until the CIL is changed following review by the District Council, the County Council is likely to object to development proposals where it is envisaged that insufficient developer funding would come forward to enable the effects of the development to be mitigated. An example of where this has happened is in the neighbouring district of Vale of White Horse where an application has been made on a proposed site allocation (P18/V2791/O) in advance of the CIL being reviewed.
14. Our detailed comments on the developer funding necessary to mitigate development are set out in the table of our response, in particular with respect to the Infrastructure Delivery Plan. We are pleased that our input to the Infrastructure Delivery Plan has largely been accepted by the District, but note that there are matters which have not been able to be resolved within the timeframes available. This includes some critical issues in respect of transport infrastructure, for example it is not currently known what the transport infrastructure solution to serve an allocation North of Bayswater Brook is.
15. In respect of both the infrastructure enabled through the Housing Infrastructure Fund and the Housing and Growth Deal, there is a requirement to also obtain developer funding. In some cases, the developer funding will be needed at the outset to fully fund the infrastructure, in other cases the developer funding can be secured and used retrospectively as part of a rolling fund where Housing Infrastructure Fund or Growth Deal funds are also used. In order to avoid any debate about this, the Local Plan should include clear policies supporting the requirement for funding of infrastructure which is enabled through forward funding, including the Housing Infrastructure Fund and the Housing and Growth Deal. Our detailed comments on this are set out in the table of this response.

Soundness Issue: The CIL that exists in South Oxfordshire does not provide sufficiently for the necessary funding of infrastructure, particularly in respect of the proposed site allocations but also in respect of any other sites that may come forward, for example through neighbourhood plans. While revision of the CIL is a separate process to the Local Plan, the timetable for CIL revision should align to enable development in accordance with the housing trajectory. In addition, the Local Plan needs to be clear about developer funding of infrastructure, including in situations where the infrastructure is provided in advance of development.

## Climate Change, Sustainability and Innovation

16. Climate change is the greatest issue facing our society. The NPPF 2018 links planning policy and the provisions of the Climate Change Act 2008. This means all local plans must set a carbon dioxide emissions reduction target and lay out clear ways of measuring progress on carbon dioxide emissions reduction. Policies DES8, DES9 and DES10 address this, but it may be that more is required in the Local Plan if not addressed sufficiently in other documents.
17. The County Council appreciates that South Oxfordshire has produced an Air Quality Action Plan and Low Emission Strategy. These, together with Developer Guidance, will help address some of the issues to bring about air quality improvements. South Oxfordshire currently has three Air Quality Management Areas in Henley-on-Thames, Wallingford and Watlington and there is a nearby Air Quality Management Area in Abingdon.
18. There is great potential for fewer motor vehicle trips on our roads in future. The Government's Road to Zero Strategy and accompanying £1.5bn investment strategy support electric vehicle research, development and infrastructure. This presents opportunities for Oxfordshire as a region to test new and emerging technologies that improve the environmental efficiency and sustainability of conventional transport systems including vehicle to grid management. Advances in technology such as the advent of connected autonomous vehicles, the rise of E commerce and the proliferation of the sharing economy are having a profound effect not only on how we live, move and spend our time but also, increasingly on urban form and development itself. The County Council is working with others to ensure that a Framework for Innovation is implemented across strategic development sites so that new development is shaped in a way that allows new technologies to deliver better outcomes for new and existing communities. The Framework will provide a mechanism that enables infrastructure developers, tech innovators, mobility providers, communities and local authorities to collaborate to deliver strategic sites that are truly fit for the future.
19. Oxfordshire has more active research and development projects on connected autonomous vehicles than any other UK locality. South Oxfordshire is a key hub in Oxfordshire for connected autonomous vehicle testing such as at the RACE facility at Culham. South Oxfordshire is able to act as a live test-bed and proving ground for Intelligent Mobility systems, Smart Region techniques, and services. New transportation technologies such as electric vehicles and autonomous vehicles can help resolve some key challenges such as poor air quality, congestion, noise pollution and road accidents. The integration of these vehicles will require innovative business models and new forms of infrastructure, but the result will be to redefine how the South Oxfordshire community moves around.
20. In line with the UK Clean Growth Strategy 2017, the County Council would like to see the Local Plan help facilitate a transition to clean growth. Further, the DEFRA Resources and Waste Strategy 2018 envisages a circular economy: an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, the maximum value is extracted from them whilst in use, with products and materials recovered at the end of each service life.

Soundness Issue: Additional text should be included within the Local Plan to ensure that the development of all strategic sites takes place in a manner which makes the best use of sustainable resources and is future-proofed.

## Housing Numbers and Oxford's Unmet Need

21. The Local Plan sets out that the housing need is 22,775 homes between 2011 and 2034. This includes 17,825 homes for South Oxfordshire's own need, a figure calculated from multiplying 775 homes per year (the mid-point identified in the SHMA 2014) for the years 2011 to 2034. The figure also includes 4,950 homes for Oxford's unmet need, in accordance with the Oxfordshire Growth Board decision in September 2016, as a proportion of unmet need to be met by 2031. The Local Plan states that this figure will be met at a rate of 495 per year between the years 2021 and 2031.
22. The County Council supports the housing need figures. We consider that the continued use of the SHMA 2014 is appropriate given that it is the latest cooperative assessment of housing need. We support South Oxfordshire District Council's agreement to provide 4,950 homes for Oxford's unmet need as it is in accordance with the Growth Board apportionment process and Memorandum of Cooperation which other authorities in Oxfordshire have used since September 2016. The District Council's acceptance of these figures is in accordance with a comment we made in November 2017 on the previous Proposed Submission Local Plan. For further information on the agreed countywide position on housing need, the Statement of Common Ground between all the Oxfordshire authorities, dated 4<sup>th</sup> February 2019, (SOCG\_04) prepared for the Cherwell Local Plan Partial Review Examination Hearings, should be referred to<sup>1</sup>.
23. Some comments about site deliverability are set out in the table of our response. We note that although the three sites proposed for allocation on the edge of Oxford propose a total of 6,400 houses, which is well in excess of the 4,950 figure, that the trajectory for these sites anticipates only 3,125 houses being completed by 2031 (and 4,600 by 2034). As 50% affordable housing in line with the Oxford City requirement is only applied to these three sites, we consider that it is these three sites which are identified to address Oxford's unmet need. We agree that these three sites are those best placed as their location close to Oxford means that they have strong economic, social and transport links with Oxford. We consider that faster delivery may be possible on the Grenoble Road and Northfield sites which may help bring the figure closer to 4,950 within the plan period. Regardless, we are not raising the lack of anticipated delivery on these sites by 2031 as a soundness issue, as delivery rates are subject to change. Instead, we support the fact that sites for at least 4,950 houses to address Oxford's unmet need are identified. We note that if the North of Bayswater Brook site allocation is found unsound, but the other two sites at Grenoble Road and Northfield are found sound, there will still be a total in excess of 4,950 houses as those two sites provide a total of 5,300 houses.
24. The Local Plan indicates in Table 5c that the anticipated housing supply is 28,465 houses by 2034. It appears from the trajectory in Appendix 8 that this supply enables the housing need figures to be exceeded each and every year. The number also clearly provides some flexibility in respect of total numbers should any one site not progress in accordance with the trajectory. There is even the flexibility of additional housing as the number anticipated beyond 2034 at the strategic site allocations allows for a further 4,025 houses. The County Council supports there being some flexibility as it reduces the risk of not meeting housing targets. The County Council also generally supports there being a mix in the size of sites that will come forward as

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<sup>1</sup> <https://www.cherwell.gov.uk/info/83/local-plans/515/local-plan-part-1-partial-review---examination/5>

this aids deliverability: Table 5c indicates that an additional 1,300 houses are likely to come forward as windfall (such as infill sites) and over 1,000 additional houses are expected on smaller sites associated with neighbourhood plans in the towns and villages. Specific concerns about some carried-over allocations and some of the town and village house requirements are set out in our table of this response – if some changes result, it is likely that the anticipated housing supply would still exceed the identified housing need figure.

25. The County Council supports the requirement for 40% affordable housing on most qualifying sites, and 50% affordable housing on sites adjoining Oxford City. The County Council has a role to play in respect of affordable housing for older persons and other persons with extra care needs and for vulnerable young people and families. The County Council intends to publish a Needs Analysis and Housing Strategy shortly. The County's Children, Education and Families service is also in acute need of additional foster families and affordable accommodation is required for County Council foster carers. Furthermore, we support provisions which will provide for key workers such as those employed in the health and care sectors, and note that housing affordability in Oxfordshire is one of the key reasons for difficulties in recruitment in these vital sectors. In respect of the overlapping area for affordable housing on the sites adjoining Oxford City, we would expect that South Oxfordshire District Council will work with Oxford City to put in place arrangements for allocating affordable housing to those on the Oxford City housing register.

### **Transport Strategy**

26. The County Council is generally supportive of the way in which this Local Plan has addressed connectivity.
27. Our 'Connecting Oxfordshire' Local Transport Plan 4 (LTP4) was produced in 2015 and updated in 2016. LTP4 is made up of several documents including an Active and Healthy Travel Strategy, a Bus/Rapid Transit Strategy, and a Rail Strategy. There are also area strategies including a Science Vale Area Strategy and an Oxford Transport Strategy. We are commencing work on producing an updated Local Transport Plan over the coming year. This Local Plan generally aligns with LTP4, for example proposed allocations close to Oxford offer excellent opportunities for making use of existing and proposed transport infrastructure, including enhancing and making better use of sustainable public transport and cycling links into Oxford. The locating of other proposed allocations, such as at Culham, where there are proposed new road links, also aligns with these strategies.
28. An Oxfordshire Rail Corridor Study is currently in preparation. This study is looking at what is required in the future on the rail network, including how to support planned growth. This study will cover consideration of the future rail network and services on the main rail corridor through Oxfordshire, including improvements at Culham which relate to the proposed allocation there. Promoting an improved level of service from Didcot to Oxford and promoting an improved level of service at Culham Station are two key priorities already in LTP4. In parallel, more detailed work is being undertaken on the feasibility and business case for re-opening the Cowley Branch Line. Re-opening that line with new stations will provide additional transport options, particularly for residents on the proposed allocation sites at Grenoble Road and Northfield. Allocation of those sites also helps with the business case for re-opening the line.

29. Our detailed concerns in respect of transport are set out in the table of this response and below in respect of site allocations. The Local Plan should not create a demand for further transport infrastructure beyond that set out in the Oxfordshire Infrastructure Strategy (OXiS), but should instead be cognisant of the limitations of existing infrastructure and support planned infrastructure.

## **Education**

30. The County Council produces an annual Pupil Place Plan which is available on our website.
31. The size of the allocations at Chalgrove Airfield, Culham, Berinsfield, Grenoble Road, Northfield and Bayswater Brook means that they create a need for whole new primary schools. The primary school requirements are generally set out in the Infrastructure Delivery Plan. Our table of comments indicates where some amendments to the Infrastructure Delivery Plan are needed.
32. At Wheatley, we anticipate that primary school pupils will attend the existing Wheatley primary school. We require more certainty on the housing numbers anticipated on the allocated site as there is limited capacity.
33. Additional secondary school capacity will be needed and the Infrastructure Delivery Plan sets out how new schools can be funded through development. It is proposed that growth at Culham and Berinsfield will be addressed by a new secondary school on the land adjacent to the Culham Science Centre. Growth at Chalgrove and surrounding areas is proposed to be addressed by a new secondary school on the Chalgrove Airfield site, which will involve relocating the existing Icknield Community College in Watlington. Growth at Grenoble Road and Northfield will be addressed by a new secondary school on the Grenoble Road site. The developers of the North of Bayswater Brook site will also be expected to contribute to new secondary school capacity in an equitable manner compared to the other developers with their funding likely split between new schools in the vicinity.
34. In addition to primary (including early years education) and secondary schools, publicly funded provision is also expected for Special Education Needs schools. Given the capacity of the eight allocations, we consider that a new Special Education Needs school (possibly an all-through school) will be required. The County Council will be developing a project to ensure that S106 contributions can be obtained towards that project.
35. Additional school capacity in the towns and villages will need to be considered through Neighbourhood Plans. An additional secondary school is planned at Didcot North East and a new secondary, Aureus, opened on Great Western Park in Didcot in September 2017.
36. Documents containing the key design criteria for new school sites are available from the County Council. These documents advise on the location of school sites, required access points, road layouts, and site proportions amongst other matters. Where new school sites are required, reference should be made in the Local Plan to the availability of these criteria.

## **Minerals**

37. The Minerals and Waste Local Plan: Part 1 – Core Strategy was adopted on 12th September 2017. The County Council supports the recognition of this in the District's Proposed Submission Local Plan, including the replication of mineral safeguarding areas on the policies map. Given that the areas around Culham and Berinsfield are mineral safeguarding areas we

seek that consideration is given to mineral extraction in advance of development as set out in the table of this response.

38. Part 2 of the Minerals and Waste Plan – Site Allocations is in preparation with a timetable for adoption by the end of 2020. Consultation was undertaken on issues and options up to 3<sup>rd</sup> October 2018. When the site allocations plan is adopted, it will form part of the Development Plan.

### **Strategic Site Allocations**

39. The Local Plan proposes seven strategic site allocations: Chalgrove Airfield; Culham; Berinsfield; Land south of Grenoble Road; Northfield; Land north of Bayswater Brook; and Wheatley Campus. Together these are expected to provide for 14,400 houses, of which 10,375 homes are expected in the plan period. Numbers reflecting the entire 14,400 houses have been tested in the Evaluation of Transport Impacts which highlights a number of issues.
40. The quantum of housing is significantly increased above that which was included in the 2017 Proposed Submission Local Plan. At that time the housing capacity of the four strategic allocations was 8,500 of which 6,575 were at that time expected to be built in the plan period. Although there has been some reduction in anticipated housing supply from smaller villages, given the increased housing number, and no step-change in reducing road vehicle use, the impacts are greater with more development. Nevertheless, the County Council accepts that the addition of more allocations enables some flexibility in accommodating housing need, and our response is based not on the quantum, but on the ability for the effects from each site to be mitigated.
41. The following comments in respect of each site provide a summary of our concerns. Additional detailed comments are provided in the table of comments in this response.
42. In respect of Chalgrove Airfield, the County Council raised concerns in our 2017 comments and earlier. The site is not located well in relation to existing towns and infrastructure, although with the other proposed strategic allocations there are opportunities to improve connectivity to key destinations. Given the likely need for extensive improvements to the road network and other mitigation, we would normally be concerned that developers would indicate that the cost of the required improvements would make such a development not viable. In this case, the developer is Homes England and we understand that the development will still be viable even with extensive transport requirements, in part because Homes England is able to undertake the works themselves. The issue of viability has taken on added importance given the changes to the NPPF in 2018 which now sets out a plan-based approach to viability. It is now necessary to be clear about the particular works required and the amount of funding required from the developer. The revised Infrastructure Delivery Plan largely reflects the Councils' current thinking, although there are still matters at issue in respect of that and the Local Plan policy as set out in the comments in our table attached, and it is not yet clear what the developer's response is. We maintain our strategic and transport concerns about this site allocation but accept that the evidence in respect of this matter can be considered during the Examination of the Plan.
43. The Berinsfield and Culham sites were also included in the 2017 Proposed Submission Local Plan. As set out in our 2017 comments, we support the principle of allocating land in these locations. Allocating at Berinsfield has the potential to support regeneration and the site is reasonably well located in respect of existing and planned transport infrastructure. Allocating

at Culham has the potential to support employment; the site is particularly well located in respect of planned transport infrastructure; and development here supports the business case for rail capacity upgrades between Didcot and Oxford. We maintain a transport concern related to the housing trajectories for these sites, as we consider that any development at either site is dependent on progress with the Culham-Didcot Thames River Crossing and the Clifton Hampden Bypass, and little detailed work on site proposals has yet progressed on either site. We expect to be able to update the Inspector during the Examination in respect of these matters.

44. The South of Grenoble Road site is well located to take advantage of links into Oxford and to support regeneration in Greater Leys. We support the principle of allocating land in this location. Masterplanning has been underway for a number of years and it is understood that the developers anticipate a new roundabout onto the A4074 which will enable a better connection to Grenoble Road than currently exists; provide for the 'Sandford Park and Ride' in accordance with LTP4; and provide for schools including a secondary school. This allocation supports the business case for reopening of the Cowley Branch Line and we consider it possible that it could deliver more quickly than the housing trajectory suggests.
45. The Northfield site includes land owned by Oxfordshire County Council, and our Property Department has indicated that it is available for development and is working with the developer. The site is well located in relation to Oxford and will support regeneration in Blackbird Leys. Like Grenoble Road, this allocation will support the business case for reopening of the Cowley Branch Line. Although masterplanning has not progressed to a significant point as yet, the developer is able to progress and it could be that this site will deliver more quickly than the housing trajectory suggests.
46. The site North of Bayswater Brook offers the opportunity of further housing located close to Oxford. However, the County Council has not had time to resolve the issue of how development could occur in this location given the capacity issues at Headington roundabout, and there has been no detailed investigation to date. The Local Plan includes mixed messages about potential future road options. Working with the developers, it is possible that a technical transport solution could be devised, for example: a new bypass or alternative road which extends at least from the Marston junction on the A40 through to beyond the Thornhill park and ride, or a re-designed Headington roundabout incorporating grade separation; plus additional links for public transport, cycling and walking into Oxford. Such indicative proposals have been included in the IDP and are mentioned in Local Plan text. However, even if a technical solution is identified, there remain issues of third-party land and cost. A strategic transport scheme in this location is not part of LTP4 and there is no government funding currently being sought. The developers have not indicated that they are willing to pay for the entire costs of technical solutions and indeed it could be that paying the full costs would make the development unviable.
47. In addition to the strategic concern about transport infrastructure at North of Bayswater Brook, the County Council is concerned that the site proposed for allocation is split into two distinct parcels with different developers and it is not likely that masterplanning will involve both parcels. However, we acknowledge that the entire large portion of the site is now under the control of one development consortium and it is only the small separated easterly part at Sandhills which is separately owned.

48. A further County Council concern in respect of the North of Bayswater Brook site is the potential for significant archaeological remains to restrict development. While archaeological constraints are not unique to the North of Bayswater Brook site, it is apparent from the concept plan that the District considers that the locations of development on this site are already otherwise constrained by matters such as landscape and flood risk. The potential for 1,100 houses on this site in the areas identified on the concept plan is unknown at this time and it is considered that the evidence base for the Local Plan, including the Sustainability Appraisal, should have utilised available heritage resources which indicate that there is a high possibility of significant constraint to development in this location. The County Council is supporting the District in its preparation of additional archaeological evidence for the Local Plan Examination.
49. The Wheatley Campus site, which was included in the 2017 Proposed Submission Local Plan, has already been the subject of a planning application (P17/S4254/O) which was refused in December 2018. The County Council's initial highways objections were largely resolved before the application was considered by the District's Planning Committee. Although we maintain transport and education concerns about this site allocation, and query the potential for early delivery given the recent refusal, the County Council has no objection to the principle of redeveloping this brownfield site.

Soundness Issue: Further evidence is needed to be confident that the infrastructure challenges associated with development at Chalgrove Airfield can be addressed and the developer is able to provide evidence of viable delivery. If confidence can be achieved, then the Local Plan will need to be amended to better set out the infrastructure requirements and likely phasing of development having regard to the timescales for providing the necessary infrastructure.

Soundness Issue: The Local Plan needs to clearly state the infrastructure challenges associated with development at Culham and Berinsfield and the need to ensure that these can be resolved. As part of the work for the Housing Infrastructure Fund bid it has been established that both these sites are dependent on the infrastructure in that bid being funded particularly the new Culham-Didcot Thames Crossing and Clifton Hampden Bypass and no development is possible until this infrastructure is secured.

Soundness Issue: The Local Plan needs to clearly state the infrastructure requirements for the Grenoble Road and Northfield sites. Further consideration should be given to whether development can proceed more quickly.

Soundness Issue: Further evidence is needed to support an allocation of land around Bayswater Brook. At present there is a significant level of uncertainty about what highways mitigation is required and whether it can be funded; and whether other constraints such as the importance of archaeological remains restricts the potential for development.

## **Green Belt**

50. Six of the seven strategic site allocations are currently in the Green Belt and the Plan proposes to amend Green Belt boundaries so that they are all removed from it.
51. The County Council acknowledges that the Green Belt can serve important purposes and that the NPPF requires evidence that there are exceptional circumstances to change the Green Belt boundaries.

52. The County Council was involved in Oxfordshire Growth Board work to assess the Green Belt as part of the Post-SHMA strategic work programme in 2016. Further to that, changes have been approved through the Vale of White Horse Local Plan Examinations. The case for amending the Green Belt to provide suitable locations to address Oxford's unmet need is compelling and the County Council considers that there are exceptional circumstances for removing land from the Green Belt.
53. We acknowledge that the specific work and background reports undertaken for South Oxfordshire District Council to address the issue of changing the specific Green Belt boundaries will be considered in detail as part of the Examination process. The County Council will be interested to take part in Examination hearings on these matters given its strategic interest.

## TABLE OF COMMENTS

### Chapter 3 – Vision and Objectives

	Reference	Comment	Proposed Change
1	OBJ 4.1	A more ambitious commitment to early delivery of infrastructure should be included.	Add 'as early as possible' so the objective reads: 'Ensure that essential infrastructure is delivered as early as possible, to support our existing residents and services as well as growth.'

### Chapter 4 – Our Spatial Strategy

	Reference	Comment	Proposed Change
2	4.3	The paragraph needs to be rephrased to reflect the Oxfordshire Growth Board Post-SHMA work programme outcomes in 2016.	Rephrase the paragraph as follows: 'The plan seeks to meet needs identified for South Oxfordshire as well as a portion of the housing needs arising from our neighbour Oxford City. A joint work programme with the other Oxfordshire authorities resulted in the Oxfordshire Growth Board agreeing apportionments of Oxford City's unmet needs in September 2016.'
3	4.8 and 4.9	The strategy to focus development at Science Vale and sustainable settlements is generally supported.	No change.
4	Policy STRAT1	The strategy is clearly articulated. We support in particular the strategy to address the unmet housing needs of Oxford on strategic allocations adjacent to the boundary of Oxford near to where that need arises, which we requested in our 2017 Pre-Submission comment.	No change.

5	Policy STRAT1	The last bullet point does not follow the same format as the previous 9 bullet points.	Typo – should be ‘supporting and enhancing’
6	4.16-4.24	The rationale for the housing requirement of 775 homes per year and use of the 2014 SHMA is positively prepared and considered sound. It is reasonable to continue use of the figure for the three extra years of this Plan period beyond 2031. Some of the explanatory text may become out of date quite quickly and could be removed to supporting evidence documents.	No change, other than updating and rationalising of text.
7	4.25-4.27	The proposal for 4,950 homes to address a portion of Oxford’s unmet need is positively prepared and considered sound. The apportionments set out by the Oxfordshire Growth Board in September 2016 have already been tested at Examination in the Vale of White Horse and West Oxfordshire and is currently at Examination in Cherwell. The monitoring time period between 1 April 2021 and 31 March 2031 is appropriate, resulting in 495 houses per year for those ten years.	No change. Clarification of how the 4,950 will be monitored would be useful.
8	4.29	The paragraph refers to the sites on the edge of Oxford City. These sites will provide an increased level of affordable housing compared to the requirement of 40% for other qualifying sites in the District but with the same percentage requirement as sites in Oxford City which is 50%. The County Council recognises that increased affordable housing could cause issues of viability, but has no objection in principle to the percentage requirement, provided that developers can still afford to pay for necessary infrastructure.	No change.

9	4.31	The paragraph refers to uncertainty in relation to the amount of housing Oxford City will eventually provide for once its Local Plan has been examined and uncertainty on the route of the proposed Oxford to Cambridge Expressway. The County Council shares the concerns and agrees that reviewing this SODC Local Plan when there is more certainty is an appropriate response.	No change.
10	Policy STRAT2	The housing requirements set out in this Policy are commented on in our text comments.  The employment requirement has been changed from 35.9 hectares to 2033 in the 2017 Pre-Submission Local Plan to 37.5 hectares to 2034 in this Plan. The County Council made no comment on the employment land requirements in our 2017 response and notes that the change is not significant.	No change.
11	4.42-4.43	The text about Didcot neglects to mention the pressing need to improve the transport infrastructure. A Didcot Garden Town Housing Infrastructure Fund bid was lodged in January 2019.	Add as the second to last sentence in paragraph 4.42: 'To support further growth, improved transport links are needed.'
12	4.44	The bullet points which list proposals for Science Vale comprehensively address the various requirements and are in line with our comments in 2017 on the Pre-Submission Local Plan. The transport elements are consistent with the County Council's own policies contained in LTP4.	No change.
13	Policy STRAT3	The County Council supports the policy that proposals for development in the Didcot Garden Town Delivery Plan Area be required to demonstrate how they contribute to the achievement of the principles in Appendix 6. Appendix 6 includes a map with a 'masterplan boundary'	No change other than clarification.

		which may be the same as the 'delivery plan area' but this should be clarified.	
14	Policy STRAT4	<p>The County Council particularly supports the parts of the policy requiring comprehensive masterplans and engagement with infrastructure providers.</p> <p>One point of engagement with the County Council will be in respect of new school sites. Appropriate engagement will ensure that we are able to ensure that school sites are appropriately located and designed in accordance with our design criteria.</p> <p>Specific reference should be included to Oxfordshire County Council's Developer Guide. Public consultation on this document commenced on 8<sup>th</sup> February 2019. The Developer Guide includes the detailed design criteria for schools as well as other advice on the S106 agreement process, education, transport, and environmental issues that the County Council is responsible for. The current document can be found online on the County Council consultations homepage.</p>	Include reference to the Oxfordshire County Council Developer Guide to Infrastructure Delivery and Contributions with an appropriate weblink.
15	Policy STRAT4	There are some repeated numbers in 5 and 6	Typos – fix numbering
16	Policy STRAT5	Higher densities can help make services such as bus services commercially viable. As the County Council no longer subsidises bus services, it is important that new development areas are designed in such a way that bus services will be commercially viable.	No change.
17	4.59	Typo in the list – 'and' should be before Wheatley.	Correct typo: 'Northfield, Land North of Bayswater Brook and Wheatley.'
18	Policy STRAT6	It may be that this policy and other policies do not need to identify that	No change, other than rationalising of text.

		the Green Belt boundary has been altered, as that is not a 'policy'.	
19	4.61 – 4.68 Chalgrove Airfield	<p>The text provides readers with an understanding of issues in respect of the allocation of Chalgrove Airfield including: uncertainty on deliverability; air quality issues; and surface water.</p> <p>Additional text should be included to refer to the challenges associated with promoting sustainable transport in this rural location.</p> <p>In respect of deliverability, we consider it a reasonable response to the current uncertainty that paragraph 4.65 advises that no houses are expected within 5 years and that if circumstances change, the allocation can be revisited through review of the Local Plan.</p> <p>Paragraph 4.66 states that there are no known archaeological constraints. This is not the case. This section does mention the registered battlefield immediately adjacent to the proposed site but does not highlight the significant constraint that the setting of this designated site poses. Any development must be carefully designed to minimise any impact to the setting of the battlefield.</p>	<p>Replace the second sentence in 4.68 with the following two sentences, or fuller text to more fully explain the situation with transport in this location: 'The site is outside the AONB and the Green Belt. The rural location has access to the B480 but limited other transport links'.</p> <p>Delete the following from 4.66: 'and largely free from constraints' and 'There are no known archaeological or ecological constraints.' Amend a sentence as follows: 'Chalgrove Field 1643, a registered historic battlefield, is located adjacent to the site to the east and the setting of that represents a significant constraint'.</p>
20	Concept plan Chalgrove Airfield	<p>It is not clear why the location of the new runway proposal for Martin-Baker is not shown on the concept plan.</p> <p>The County Council supports not specifically identifying the location of schools.</p>	Refine the concept plan, having regard to consistency with other concept plans.
21	Policy STRAT7 Chalgrove Airfield	The policy requirements for development at Chalgrove Airfield are significant. We are concerned about whether all the policy requirements can be viably met.	See covering text comments.

22	Policy STRAT7 – 2vi Chalgrove Airfield	The policy requires a new secondary school ‘which incorporates a relocation for Icknield school from Watlington’. We support reference to the strategy to relocate Icknield school onto this site, but note that the relocation would be subject to the approval of the Regional Schools Commissioner.	Amend text to: ‘which incorporates a relocation for Icknield school from Watlington (subject to the approval of the Regional Schools Commissioner)’.
23	Policy STRAT7 2ix	There should be no implication that the required transport mitigation will be limited to that set out in the current IDP. While a considerable amount of work has been done by the developers and the County Council in the last year, the extent of transport mitigation required will only be known when a full Transport Assessment has been completed, and this would only be expected when a planning application is lodged. The text should be amended to make this clear.	Amend text to: ‘to deliver all necessary transport infrastructure which is likely to include the following as set out in the Infrastructure Delivery Plan:’
24	Policy STRAT7 – 2ixb Chalgrove Airfield	<p>The policy is not consistent with the IDP in respect of the locations that require mitigation and therefore needs correcting.</p> <p>The policy needs to be clear about the extent of transport mitigation envisaged in respect of the Chalgrove Airfield development, based on the information in the IDP. It should also be clear that the transport mitigation necessary is more than is required for most sites given the relatively remote location. In this case the developer is an agency of the government (Homes England) which has powers to compulsorily purchase land itself and to undertake the necessary works.</p>	Amend text to: ‘but not limited to Benson, Stadhampton, Chiselhampton, Cuxham and Watlington, including highway intervention measures to mitigate additional impacts, both transport and environmental (including air quality), at Hollandtide Lane, on the B480 near Oxford, on the A4074 at Golden Balls roundabout and in the settlements of Cuxham, Chiselhampton, Little Milton, Stadhampton, Shirburn and other settlements where justified. In particular, land will need to be identified and secured for delivery for the proposed route of the Chiselhampton, Stadhampton and Cuxham bypasses, as supported by more detailed evidence as it comes forward;’
25	Policy STRAT7 – 2ixd	The policy needs to be clear that cycling and walking infrastructure will	Amend text to: ‘Deliver high quality infrastructure to encourage cycling and walking, and provide links

	Chalgrove Airfield	<p>need to be improved beyond the village.</p> <p>It should also be noted that although the public rights of way network was extinguished through the site given its airfield use, that there is an opportunity to recreate public rights of way.</p>	<p>through the site, to adjacent employment, into the village of Chalgrove, and to other surrounding locations;'</p> <p>Consideration should be given to specifically mentioning public rights of way consistent with other policies, noting the potential to recreate rights of way.</p>
26	Policy STRAT7 – 3 Chalgrove Airfield	This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site.	<p>Add: 'vii) high quality walking and cycling routes within the site;</p> <p>viii) provision of infrastructure to support public transport through the site.'</p>
27	Various 4.69 onwards	<p>There are inconsistent references to the Green Belt in supporting text to all the allocations other than Chalgrove Airfield. In all cases the proposed plan seeks to change the Green Belt boundaries.</p> <p>Modifications to the Plan will be necessary post Examination to reflect this in revised text.</p>	Include consistent text for each allocation where Green Belt boundaries are reviewed.
28	4.69 to 4.74 Culham	<p>The text provides a good level of detail about Culham Science Centre, particularly the need for new transport links in this location. However, LTP4 isn't fully named in paragraph 4.73 and wording should be improved in respect of that.</p>	Amend text to: 'These schemes are part of a package of transport infrastructure in this area as identified in the Science Vale Area Transport Strategy in Connecting Oxfordshire: Local Transport Plan 2015-2031. The package includes a new river crossing between Culham and Didcot, a Clifton Hampden Bypass, Science Bridge, A4130 widening, and the third part of the Didcot Northern Perimeter Road.'
29	4.75 Culham	<p>The reference to the concept plan in the paragraph should be deleted. The current reference appears to be a policy requirement. Our comments on the concept plan are below.</p>	Delete: 'which should be in compliance with the concept plan below'.
30	Concept plan Culham	The concept plan should be extended to include the Science Centre, as that is also proposed for allocation. The No. 1 site is shown as for	Refine the concept plan, having regard to consistency with other concept plans. Delete any reference to schools on the concept plan as

		<p>‘employment’ although supporting text refers to a mixed-use development on this part. Showing locations for schools is opposed by the County Council as it is too rigid and not supported by evidence. The identification of the cycle path linked bridge is supported as there is evidence to support the need for this.</p>	<p>they fall within ‘built development’. Extend the concept plan to include the Science Centre and revise what the concept plan shows in respect of the No. 1 site.</p>
31	<p>Policy STRAT8 Culham Science Centre</p>	<p>The policy requirements are generally supported.</p>	<p>See covering text comments.  Consider rationalising of text.</p>
32	<p>Policy STRAT9 3vii  Land Adjacent Culham</p>	<p>There should be no implication that the required transport mitigation will be limited to that set out in the current IDP. While a considerable amount of work has been done by the developers and the County Council in the last year, the extent of transport mitigation required will only be known when a full Transport Assessment has been completed, and this would only be expected when a planning application is lodged. The text should be amended to make this clear.</p> <p>A clear policy steer should be provided within the Local Plan to ensure that the transport effects of new development are fully addressed and there is no mathematical reduction in the number of trips expected as a result of supposed development rights at the Culham No. 1 site. Only existing trips on the network can be discounted from the future trip numbers generated by the housing allocation. This is important as a reduced forecast for traffic growth could impact on infrastructure delivery, which is highlighted as a key requirement for site delivery.</p>	<p>Amend text to: ‘to deliver all necessary transport infrastructure which is likely to include the following as set out in the Infrastructure Delivery Plan:’</p> <p>Consider further amendments to make it clear how transport is to be addressed in regard to existing uses on the No. 1 site.</p>

33	Policy STRAT9 3vii b  Land Adjacent Culham	<p>This section is not clear. The public transport and cycling requirements should be split into separate sections. Consequently, renumber.</p> <p>Consideration should be given to specifically mentioning public rights of way consistent with other policies.</p>	<p>Amend text to: ‘b. Provide for excellent public transport services and facilities including, but not limited to: provision of a scheduled bus service, with a minimum of two buses per hour between Berinsfield, Culham and Abingdon, with options to extend or vary services to locations such as Cowley, Chalgrove and Didcot;</p> <p>c. Deliver high quality infrastructure (new and improvements to existing) to promote walking and cycling, including but not limited to: provision of a new cycle bridge over the River Thames to connect appropriately with Abingdon on Thames to the north of the site; improvements to existing cycle infrastructure along the A415; new cycle infrastructure towards Didcot.’</p> <p>Consider additional specific reference to contributions to improve public rights of way on site and in the vicinity.</p>
34	Policy STRAT9 – 4 Land Adjacent Culham	<p>This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site.</p>	<p>Add: ‘viii) high quality walking and cycling routes within the site;</p> <p>ix) provision of infrastructure to support public transport through the site.’</p>
35	Policy STRAT9 Land Adjacent Culham	<p>Part of the strategic allocation at Land Adjacent to Culham Science Centre (most of the area south of Thame Lane) is within a Minerals Safeguarding Area for sharp sand and gravel to which policy M8 of the Oxfordshire Minerals and Waste Local Plan, Part 1 – Core Strategy applies.</p> <p>The part of this strategic allocation to the east of the railway (No. 1 site) includes a waste management site that is safeguarded under policy W11 and Appendix 2 of the Oxfordshire</p>	<p>Change Policy STRAT 9, clause 4 vi) to: ‘a layout that takes into account the mineral safeguarding area that covers part of the site and land to the south and the safeguarded waste management site within the eastern part of the site and the amenity of future residents; and a requirement for a minerals assessment that considers if minerals can be extracted in advance of development in accordance with Policy EP5’.</p>

		<p>Minerals and Waste Core Strategy (site no. 216, Culham No. 1). Policy STRAT 9 provides for the retention and increase of employment land so is considered not to be contrary to this safeguarding, as retention or relocation of the waste facility should be possible.</p> <p>There is no objection to the allocation in respect of minerals or waste safeguarding, provided these factors are taken into account in any development proposals. They should be included as matters to be demonstrated in the masterplan in part 4 of this policy.</p> <p>The masterplan requirement relating to minerals safeguarding in part 4 vi) of the policy is incorrect as the mineral safeguarding area extends to the south of the site and there is no minerals safeguarding area to the north.</p>	
36	Policy STRAT9 Land Adjacent Culham	Typos	<p>Amend xi to refer to A415 (not A405) and the Thames River crossing rather than road crossing.</p> <p>Text may also need to be refined.</p>
37	4.76 to 4.89 Berinsfield	<p>The text provides readers with an understanding of the regeneration impetus for allocating the site at Berinsfield. The principle of some growth was indeed established from the Inspector’s report on the Core Strategy in 2012.</p> <p>Additional text should be included on transport issues, which are only briefly touched on in paragraph 4.89.</p> <p>Additional text should refer to primary school education needs and the strategy to provide a new secondary school on the Culham site, linked by a bus service to Berinsfield.</p>	<p>Add a new paragraph between 4.82 and 4.83 along the following lines: ‘Improved education facilities will also support regeneration. The development will need to provide the funding to support new primary education in Berinsfield. Two primary school sites are expected to be safeguarded within the new development as at least one new primary school will be needed. One of the sites should be large (3.1ha) to enable the option of having a single new school to serve Berinsfield. Contributions to a new secondary school at Culham are required, and this new school would become the</p>

			<p>catchment school for Berinsfield. The Culham site would be linked to Berinsfield with a bus service’.</p> <p>Amend paragraph 4.89 (deleting reference to the secondary school if mentioned earlier in new paragraph as suggested) along the following lines: ‘In addition to the regeneration package to be delivered at Berinsfield, the development will also be expected to mitigate the transport effects of development. This will include contributing towards road infrastructure (such as the new Culham river crossing, the Clifton Hampden bypass and upgrades to the Golden Balls roundabout) as well as site-specific transport infrastructure such as improving the Berinsfield roundabout and adding a new access onto the A4074 as envisaged in the concept plan. The requirements are set out in the Infrastructure Delivery Plan.’</p>
38	4.87 Berinsfield	The text should include a specific reference to the North Wessex Downs and Chilterns AONBs and their setting. Such text would better explain Policy STRAT10 3 i, which requires the maintenance of key views to the Chiltern Hills and Wittenham Clumps.	Amend the last part of the paragraph to read: ‘The masterplan must include extremely sensitive design; landscape planting and the maintenance of key views to and from important landmarks such as the Chiltern Hills and the Wittenham Clumps to mitigate any harm to the Green Belt, the AONBs or their settings as best as is possible’.
39	Concept plan Berinsfield	The concept plan identifies roughly half of the proposed allocation for development bringing into question the need for allocating the full extent of land. Showing locations for schools is opposed by the County Council as it is too rigid and not supported by evidence. The County Council supports a northern road access as identified in the indicative route alignment as a second access on the A4074 to the existing	Refine the concept plan, having regard to consistency with other concept plans. Delete any reference to schools on the concept plan as they fall within ‘built development’. Delete suggestion of a route linking to the Burcot Lane. Retain notation of a northern road access.

		<p>roundabout is needed. A second access onto the A4074 is necessary given the scale of the development, and the District Council as a promoter of the development has compulsory purchase order capabilities to achieve such an access if it cannot be negotiated with the landowner. The concept plan should not suggest an additional link to the Burcot Lane as there should be no suggestion that traffic could travel west to Drayton St Leonard as the road is not suitable to receive a significant increase in traffic (instead there may be a need for traffic calming measures).</p>	
40	<p>Policy STRAT10 Berinsfield</p>	<p>The strategic allocation at Berinsfield is within a Minerals Safeguarding Area for sharp sand and gravel to which policy M8 of the Oxfordshire Minerals and Waste Local Plan, Part 1 – Core Strategy applies. The Minerals Safeguarding Area also covers adjoining land to the north and east.</p> <p>There is no objection to the allocation in respect of minerals safeguarding, provided this factor is taken into account in any development proposals. It should be included as a matter to be addressed under part 2 of this policy.</p> <p>The inclusion at clause 2 viii) of this policy of a requirement for a minerals assessment is supported but the limitation to on-site use of extracted minerals is not in accordance with Policy EP5 and is an unnecessary restriction.</p>	<p>Change Policy STRAT 10, clause 2 viii) to: ‘a layout that takes into account the mineral safeguarding area that covers the site and land to the north and east and the amenity of future residents; and a requirement for a minerals assessment that considers if minerals can be extracted in advance of development in accordance with Policy EP5’.</p>
41	<p>Policy STRAT10 2iv Berinsfield</p>	<p>Item 2 (iv) of this policy states that the development will need to ‘provide sufficient education capacity, likely to be a total of two primary schools on site...’. At this stage it is necessary to protect sites for two primary schools, but the eventual solution may only require</p>	<p>Amend ‘2 iv’ to ‘provide sufficient education capacity, as agreed with the county council, likely to involve two primary schools...’</p> <p>Correct ‘Thames road crossing’ to refer to ‘Thames River crossing’.</p>

		<p>one new primary school. The important aim is to ensure high quality education for all children in Berinsfield, and the County Council will work with the District Council and other stakeholders to identify the best way to achieve this aim.</p> <p>Possible solutions include: two new schools on the development site; improvements to the existing school in Berinsfield plus one new school; or one large new school on the development site.</p>	
42	Policy STRAT10 Berinsfield	<p>There should be no implication that the required transport mitigation will be limited to that set out in the current IDP. While a considerable amount of work has been done by the County Council in the last year, the extent of transport mitigation required will only be known when a full Transport Assessment has been completed, and this would only be expected when a planning application is lodged. The text should be amended to make this clear.</p>	<p>Amend text to: ‘to deliver all necessary transport infrastructure which is likely to include the following as set out in the Infrastructure Delivery Plan.’</p>
43	Policy STRAT10 2vi Berinsfield	<p>Inconsistencies should be corrected.</p>	<p>Change Thames road crossing to ‘Thames River crossing’.</p> <p>Refer to ‘significant contributions’ in the same manner as Policy STRAT9’.</p>
44	Policy STRAT10 Berinsfield	<p>Specific mention of public transport is missed out of this policy in a manner inconsistent with other policies. Providing for bus services is an important aspect of the proposal for regeneration at Berinsfield, as set out in the IDP.</p>	<p>Add to ‘2 vi’ as follows: ‘provision for excellent public transport facilities including pump priming a scheduled bus service, with a minimum of two buses per hour between Berinsfield, Culham and Abingdon, with options to extend or vary services to Chalgrove and Didcot’.</p>
45	Policy STRAT10 Berinsfield	<p>Specific mention of pedestrian and cyclist infrastructure is missed out of this policy in a manner inconsistent with other policies. There are good opportunities to improve pedestrian</p>	<p>Add to ‘2 vi’ as follows: ‘high quality infrastructure to encourage cycling and walking, and provide links through the site and to adjacent employment and into the village of Berinsfield and to other surrounding locations including Culham and</p>

		<p>and cyclist infrastructure, as set out in the IDP.</p> <p>Consideration should be given to specifically mentioning public rights of way consistent with other policies.</p>	<p>Abingdon; specifically (but not limited to) improving the existing pedestrian / cyclist infrastructure along the A415 from Berinsfield to Culham, and providing for a cycle route from Berinsfield to Oxford.’ Consider additional specific reference to contributions to improve public rights of way on site and in the vicinity.’</p>
46	Policy STRAT10 Berinsfield	<p>This site (like the Culham site) will require an archaeological evaluation as well as an assessment.</p>	<p>The same text as for Policy STRAT9 should be added as follows: ‘Archaeological evaluation will need to be undertaken ahead of the determination of any planning application in order to assess the significance of deposits in line with the NPPF 2018. A scheme of appropriate mitigation will be required following this evaluation including the physical preservation of significant archaeological features and their setting where appropriate.’</p>
47	Policy STRAT10 – 3 Berinsfield	<p>This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site.</p>	<p>Add: ‘iii) high quality walking and cycling routes within the site; iv) provision of infrastructure to support public transport through the site.’</p>
48	4.91, 4.96, 4.98 Grenoble Road	<p>The County Council supports the text identifying that affordable housing, an extension to the South Oxford Science Park, and regeneration of Greater Leys can arise as a result of development South of Grenoble Road. There is also reference to the provision of a new park and ride site, which is consistent with the County Council’s current LTP4. The Local Plan also proposes to safeguard the relevant land for the ‘Sandford’ park and ride site. The County Council will be able to advise the Inspector of the current position in respect of plans for park and ride during the Examination.</p>	<p>No change, other than possible updating of text.</p>
49	Concept plan	<p>The concept plan shows a large area of green infrastructure to the east,</p>	<p>Refine the concept plan, having regard to consistency with other</p>

	Grenoble Rd	but the reason for that is not apparent. Showing locations for schools is opposed by the County Council as it is too rigid and not supported by evidence. The County Council supports indicative road links and considers that a new link through to the A4074 with a new roundabout will be necessary. The extension of the Science Park and the safeguarded park and ride site are supported.	concept plans. Delete any reference to schools on the concept plan as they fall within 'built development'.
50	Policy STRAT11 Grenoble Rd	Part '1' refers to '1,700 within this plan period' whereas other policies refer to 'expected within this plan period'. The text of policies should be consistent unless there is some specific reason. In the case of this site at Grenoble Road, the County Council considers there are opportunities for faster delivery.	Amend '1' to '1,700 expected...' consistent with other policies or amend text to indicate the potential for faster delivery.
51	Policy STRAT11 Grenoble Rd	Part '2 - iv' refers to '10.55 hectares for a secondary school with an initial capacity of 600 students and this should have the capability to expand to meet future needs'. The text of other policies which simply refer to a new 8 form entry secondary school with sixth form on site is preferable. The text of policies should be consistent unless there is some specific reason. The detail of the requirement for 10.55ha is set out in the IDP.	Amend '2 - iv' to '...one new 8 form entry secondary school with sixth form on site...'
52	Policy STRAT11 2 v and vi Grenoble Rd	There is an apparent error in the reference only to Blackbird Leys as the earlier text also refers to Greater Leys and integration and improvement to existing community facilities and services at both is necessary.	Add: 'and Greater Leys' at the end of v and vi.
53	Policy STRAT11 2ix Grenoble Rd	An additional sub-bullet point to the 9 <sup>th</sup> bullet point is needed to refer to likely necessary road improvements.	Add an additional sub-bullet point to the 9 <sup>th</sup> bullet point: 'upgrades to the existing junctions on the Oxford Eastern bypass (A4142), including

			Heyford Hill and Cowley junctions and Golden Balls roundabout.’
54	Policy STRAT11 – 3 Grenoble Rd	This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site.	Add: ‘v) high quality walking and cycling routes within the site; vi) provision of infrastructure to support public transport through the site.’
55	4.102 to 4.106 and STRAT 12 Northfield	There is no mention of any need for the development at Northfield to contribute to regeneration in the surrounding area, as there is for Grenoble Road (Greater Leys and Blackbird Leys) and Berinsfield (existing Berinsfield village). This development could also contribute to regeneration in Blackbird Leys.	Amend text and policy to provide for potential contributions to regenerate neighbouring Blackbird Leys.
56	4.102 to 4.106 and STRAT 12 Northfield	<p>The text should provide additional information about this site from a transport point of view consistent with other proposed allocations. Given its location close to Oxford City and opportunity for good transport links, the County Council generally supports development in this location.</p> <p>As the proposal is to amend Green Belt boundaries to take this site out of the Green Belt, the text needs changing to make it clear that Green Belt will not be a constraint on the site as it will no longer be in the Green Belt if this allocation is confirmed as proposed.</p> <p>Consideration should be given to specifically mentioning public rights of way consistent with other policies.</p>	<p>Amend references to the Green Belt to acknowledge the proposal to remove the Green Belt in this location and add text about the transport advantages of allocating this site such as additional sentences as follows:</p> <p>End of 4.103: ‘Northfield is well located for access to employment and services within walking and cycling ranges and the B480 is an existing public transport corridor. There are opportunities to provide improved transport links’.</p> <p>End of 4.106 ‘...as well as a range of other matters such as transport’.</p> <p>Consider additional specific reference to contributions to improve public rights of way on site and in the vicinity.</p>
57	Concept plan Northfield	Reference is made to potential access points on this concept plan, when there is no such reference on the other concept plans, and therefore it should be deleted. Furthermore, the symbol used for the access points is the same as that used for a cycle path	Refine the concept plan, having regard to consistency with other concept plans (for example deleting the access points). Delete any reference to schools on the concept plan as they fall within the definition of built development. Explain any

		<p>bridge on the Culham concept plan, adding to the confusion.</p> <p>The reason for an indicative route alignment is not apparent from the text or policy. If the intention is a new road suitable for the bus route, there could be some advantage, as the County Council generally requires all development to be within 400m of a bus route.</p>	<p>new road proposal on the concept plan in supporting text.</p>
58	Policy STRAT12 Northfield 2iii	Typo – 2 iii) – ‘other or’	Amend typo – 2 iii) ‘...contributions towards an off-site secondary school...’
59	Policy STRAT12 Northfield 2	<p>The text currently requires provision and contribution towards walking and cycling ensuring the site is well connected to Oxford City and appropriate surrounding villages. This should also include reference to walking and cycling connections to Grenoble Road, where Northfield residents will need to access schools. Public rights of way could be specifically mentioned.</p>	<p>Amend to: ‘provision and contribution towards the cycling and walking infrastructure network on and off site ensuring the site is well connected to Oxford City, school sites and appropriate surrounding villages.’</p> <p>Consider additional specific reference to contributions to improve public rights of way on site and in the vicinity.</p>
60	Policy STRAT12 2vi Northfield	An additional sub-bullet point to the 2 <sup>nd</sup> bullet point is needed to refer to likely necessary road improvements.	Add an additional sub-bullet point to the 2 <sup>nd</sup> bullet point: ‘upgrades to the existing junctions on the Oxford Eastern bypass (A4142), including Cowley junction.’
61	Policy STRAT12 – 3 Northfield	<p>Amendment to the policy is required to reflect the apparent intention for a new bus route as set out in the concept plan.</p> <p>This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site.</p>	<p>Add: ‘vi) high quality walking and cycling routes within the site;</p> <p>vii) provision of infrastructure to support public transport through the site.’</p>
62	Policy STRAT12 Northfield	This site is located in an area of considerable archaeological potential adjacent to the Roman Road from Dorchester to Alchester. No	The same text as for Policy STRAT9 should be added as follows: ‘Archaeological evaluation will need to be undertaken ahead of the

		<p>archaeological investigation has been undertaken on the site but Roman coins have been recovered from the site itself. Roman settlement and pottery manufacturing sites have been recorded within the vicinity of the site. It is therefore possible that archaeological deposits, including significant sites, could survive on the site. A programme of archaeological investigation will need to be undertaken across the site before the impact on any such deposits can be assessed.</p> <p>It is possible that the archaeological constraints will limit the housing numbers on this site to less than proposed.</p>	<p>determination of any planning application in order to assess the significance of deposits in line with the NPPF 2018. A scheme of appropriate mitigation will be required following this evaluation including the physical preservation of significant archaeological features and their setting where appropriate.'</p>
63	Land north of Bayswater Brook	The County Council's strategic concerns in respect of this allocation are set out in the covering text comments.	See text comments.
64	Land north of Bayswater Brook name and 4.112	The name of this site and some text e.g. 4.112 incorrectly describes the site as North of Bayswater Brook when the most easterly portion at Sandhills (separated from the rest of the site) is south of Bayswater Brook. It is understood that the separated easterly portion is in different ownership from the remainder of the proposed allocation. Masterplanning incorporating this portion therefore seems unlikely.	If the site is to be allocated following Examination, amend text and name as appropriate to avoid any misrepresentation, and consider whether two separate allocations are needed.
65	Bayswater Brook	Access to the most easterly portion at Sandhills is not clearly defined in the text. If access is required by extending Burdell Ave and Delbush Ave, this would cross a well-used green corridor and bridleway which runs east-west at the end of these roads, and any proposed truncation of that bridleway would be considered contrary to other policies	If the site is to be allocated following Examination, ensure that access to the bridleway at Sandhills is not adversely affected, and that the vehicle access requirements to this most easterly portion of Sandhills are clear and are supported by appropriate transport evidence.

		of the Local Plan. Such access could also have other issues.	
66	4.107 Bayswater Brook	The County Council is concerned that there is reference to the site being 'well positioned to connect with public transport provision in Oxford City' as an exceptional circumstance related to changing the Green Belt boundaries for this site, but not other strategic site allocations. In respect of other proposed allocations where the Green Belt is proposed to be removed, the opportunities for connecting with public transport are better. On those other sites there are existing routes into Oxford which can be adapted. There are no existing public transport routes that can readily be adjusted to cater for this site. Instead, there are significant difficulties with devising an appropriate public transport solution for this site. Although bus companies provided some optimistic views to the District Council when the sites were being assessed, the County Council's view is that any solution would likely require significant infrastructure improvements.	If the site is to be allocated following Examination, delete specific reference to public transport provision as being a positive point, or review this text having regard to the circumstances set out for Green Belt removal at other sites.
67	4.107 Bayswater Brook	The text currently says, 'The site's proximity to major employment locations and a wide range of services and facilities means that there is high potential to support travel by walking and cycling;'. The County Council considers this will only be the case if significant improvements are made to mitigate the severing effect of the A40, i.e. a pedestrian and cycle bridge or similar.	If the site is to be allocated following Examination, delete specific reference to proximity or review this text having regard to the circumstances set out for Green Belt removal at other sites.
68	4.110 Bayswater Brook	The text refers to an area west of the site as 'safeguarded for access only'. In fact, no safeguarding in this location is proposed in the Local Plan, and the text is presumably referring	If the site is to be allocated following Examination, amend text to delete reference to safeguarding and update in relation to any changes to the concept plan.

		to the concept plan identification of 'transport access only'.	
69	4.114 and 4.115 Bayswater Brook	The text describes key transport challenges associated with the Bayswater Brook site but does not adequately describe proposals for any solutions.	See text comments.
70	4.117 Bayswater Brook	The text correctly identifies that archaeology is a constraint.	See text comments.
71	4.107 to 4.118 Bayswater Brook and STRAT13	There is no mention of any need for the development at Bayswater Brook to contribute to regeneration in the surrounding area, in this case Barton, as there is for Grenoble Road (Greater Leys and Blackbird Leys) and Berinsfield (existing Berinsfield village). In Barton, life expectancy from birth for males and females is 77.5 years and 81.6 years respectively, notably lower compared to the Oxfordshire averages of 80.9 years and 84.1 years.	If the site is to be allocated following Examination, amend text and policy to provide for potential contributions to regenerate neighbouring Barton.
72	Concept plan Bayswater Brook	<p>The County Council objects to the indicative route alignment which implies that a route between the Marston interchange and Bayswater Road is possible mitigation for the transport issues concerning allocating this site.</p> <p>The concept plan does not align with point c in the policy text which says: 'a new road access between the site and the A40/ B4150/ Marsh Lane junction, and either a new road link between the site and the A40 between the Thornhill Park and Ride junction and the Church Hill junction for Forest Hill, or significant upgrades to the existing A40 Northern Oxford Bypass road including at the A40/ A4142 Headington Roundabout...'</p> <p>The policy text has been informed by County Council comments, but at this</p>	<p>See text comments.</p> <p>If the site is to be allocated following Examination, amend concept plan following resolution to the transport issues.</p>

		stage there is no decision on the likely necessary transport mitigation, therefore the issue requires resolution.	
73	STRAT13 Bayswater Brook	The policy provides better detail concerning the various issues than the earlier text. However, the requirements are extensive and we have concerns on this and viability.	See text comments.
74	STRAT13 Bayswater Brook	Typos	If the site is to be allocated following Examination, refer to 'hospitals' rather than only the John Radcliffe Hospital and refer to 'A40 Northern Bypass' rather than Oxford Bypass.
75	STRAT13, 3 Bayswater Brook	This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site, other than with respect to walking/cycling within the green infrastructure identified in point ix).	If the site is to be allocated following Examination, add 'x) high quality walking and cycling routes within the site;  xi) appropriate provision of infrastructure to support public transport through the site.'
76	STRAT13, 3 ix d Bayswater Brook	This part of the policy states that development must demonstrate that the network of green infrastructure 'retains and incorporates existing public rights of way and supports movement through the site and into adjoining areas by walking and cycling'. This (or similar) is supported, and other site policies should be consistent with it.	If the site is to be allocated following Examination, retain requirements relating to public rights of way. Similar mentions should be included in other strategic site policies.
77	STRAT13 Bayswater Brook	The archaeological assessment highlighted in section 4 of this policy will also need to include a full archaeological evaluation of the site before any appropriate mitigation can be determined.  The site is in an area of archaeological potential and it is possible that the archaeological constraints will limit the housing numbers on this site to less than proposed.	If the site is to be allocated following Examination, text should be added as follows: 'Archaeological evaluation will need to be undertaken ahead of the determination of any planning application in order to assess the significance of deposits in line with the NPPF 2018. A scheme of appropriate mitigation will be required following this evaluation including the physical preservation of significant archaeological features and their setting where appropriate.'

78	4.119 to 4.121 Wheatley additional land for Green Belt release	It is understood that there will be a proposal for changing the Green Belt boundaries in the forthcoming Neighbourhood Plan. (The proposal for Green Belt release was included in the 2017 Pre-Submission Local Plan but due to changes in national planning guidance this can now be a Neighbourhood Plan matter.) The County Council did not object to the principle of additional Green Belt release in our 2017 response and will consider the matter when it arises through the Neighbourhood Plan.	No change.
79	4.126 Wheatley	The County Council supports the recognition of development capacity constraints in Wheatley due to primary school capacity. However, the text of this paragraph which includes: 'there is limited potential for primary school provision to be extended at present' is slightly misleading, as it is not thought viable to expand the primary school. The school's existing accommodation is expected to be able to meet the needs of around 300 new homes.	Replace: 'There is limited potential for primary school provision to be extended at present' with: 'There is a limit to how many additional pupils it would be feasible for the village primary school to accommodate'.
80	Concept Plan Wheatley Campus	The concept plan shows a large area of green infrastructure to the west, but the reason for that is not apparent, apart from the Scheduled Monument. Nevertheless, the County Council is aware of the issues which have been raised through the refused planning application for development of this site P17/S4254/O. The reason for the large area of green infrastructure should be clear in the text if this concept plan is to remain unchanged.	Revise so that the text and concept plan are consistent.
81	STRAT14 Wheatley Campus	The County Council's November 2017 comments requested that 'approximately' 300 homes be referred to, rather than 'at least' or that another approximate number be identified. The recent planning	Change 'at least 300 homes' to an approximate number of homes, consistent with other allocations. The number should be identified in conjunction with the developer and other interested parties, having

		<p>application for 500 homes was refused. A number larger than 300 homes will better support a bus service becoming commercial and potentially better fund other items of infrastructure, therefore the County Council agrees that a higher number is desirable, subject to there being education capacity in the village.</p>	<p>regard to infrastructure requirements and education capacity.</p>
82	STRAT14, 2 Wheatley Campus	<p>The text currently requires cycling and walking links to the centres of Holton and Wheatley and to the primary school. The County Council supports links to the centre of Wheatley and considers it necessary to have cycling and walking links leading to additional areas in Wheatley such as employment areas, but does not consider it necessary to have cycling and walking links to Holton given that the only facility there is the Holton village hall.</p> <p>Consideration should be given to specifically mentioning public rights of way, consistent with other policies.</p>	<p>Include a requirement for cycling and walking links to areas of employment in Wheatley.</p> <p>Consider deleting the requirement for cycling and walking links to the centre of Holton.</p> <p>Consider additional specific reference to contributions to improve public rights of way on site and in the vicinity.</p>
83	Policy STRAT14 – 3 Wheatley Campus	<p>This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site.</p>	<p>Add: ‘v) high quality walking and cycling routes within the site; vi) provision of infrastructure to support public transport through the site.’</p>
84	HEN1 TH1 WAL1	<p>The strategies and supporting text generally appropriately provide for the future of Henley-on-Thames, Thame and Wallingford.</p> <p>The house number requirement in Chapter 5 and Policy H3 is commented on separately in this table.</p>	<p>See separate Policy H3 comment on house numbers.</p>
85	HEN1 TH1 WAL1	<p>The policies appropriately provide for car parking and pedestrian and cycle links but also need to provide for improvements to bus services.</p>	<p>Amend to include requirements to improve bus services.</p>

86	HEN1	An additional policy requirement is needed to ensure that appropriate consideration is given to the special qualities of the Chilterns AONB and its setting.	Amend to include an additional policy requirement to protect the Chilterns AONB.
87	4.139 Wallingford	The bullet point which refers to the Chilterns AONB should also refer to the North Wessex Downs AONB.	Amend to read: 'Access to the surrounding Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty.'
88	WAL1	An additional policy requirement is needed to ensure that appropriate consideration is given to the special qualities of the Chilterns AONB and the North Wessex AONB and their settings.	Amend to include an additional policy requirement to protect the Chilterns and North Wessex AONBs and their settings.

## Chapter 5 – Delivering New Homes

	Reference	Comment	Proposed Change
89	5.9 and Policy H2 saved allocations	The County Council considers that there is insufficient evidence to indicate that all of the sites previously allocated should continue to be saved. Instead, the deliverability of all these sites should be examined. In particular, the County Council considers that 300 homes at Orchard Centre Phase 2 is no longer an appropriate allocation. It is not clear that 300 homes can fit on the remaining land, and if it could, it would likely result in severe transport effects in the vicinity.	Delete any allocations which are not supported by evidence and not deliverable. In particular, consider deleting the allocation for 300 homes at Orchard Centre Phase 2.  Consequently, amend Table 5a and Table 5c.
90	5.16 and Policy H3 market towns	The County Council's views on the Local Plan's expectations of growth at the market towns were set out in our 2017 response. We accepted that there was scope for suitable sites at Thame and Wallingford, but had concerns about Henley-on-Thames given that the transport network in the area is over capacity. This revised plan has an expectation of 15%	No change.

		<p>growth at all market towns, which has already been exceeded at Wallingford, but requires an additional 156 homes at Henley-on-Thames and 363 homes at Thame. The County Council is particularly concerned about Henley-on-Thames given the transport and air quality issues there. Additional transport evidence will be needed to support a revised Henley and Harpsden Neighbourhood Plan assessing the impacts on the transport network and proposed mitigation measures. Appropriate reference to the need for this is made in paragraph 5.16.</p>	
91	5.30 and Policy H4	<p>This Plan has a requirement of 15% growth at the larger villages with Table 5f setting out the outstanding requirements as follows: Cholsey – 27; Goring-on-Thames - 233; Sonning Common – 108; Woodcote – 131.</p> <p>The Cholsey neighbourhood plan is nearing completion and is likely to provide for in excess that housing number.</p> <p>The Goring-on-Thames neighbourhood plan is nearing completion, but the submitted plan provides for only 94 houses.</p> <p>The Sonning Common and Woodcote neighbourhood plans will need to be revised to cater for the numbers.</p> <p>Consistent with the position in our November 2017 comment on the then Proposed Submission Local Plan, given the relatively small numbers, and reduced uncertainty on location compared to the 2017 Plan, the County Council will normally seek to address concerns through Neighbourhood Plans or individual applications.</p>	<p>Include a clearer acknowledgement that the figures for each village are dependent on neighbourhood plan evidence, or revise if information is available. In particular, the largest number of 233 at Goring-on-Thames should be re-considered following the outcome of the current neighbourhood plan examination.</p>

		Paragraph 5.30 appropriately refers to the need for evidence to support the numbers for each neighbourhood plan, but this could be made clearer.	
92	5.30 and Policy H4	This policy does not itself require supporting infrastructure and reference to other policies is required. The increased housing numbers proposed for Goring, in conjunction with the increase in other nearby villages (especially Woodcote) would be expected to require the expansion of Goring CE Primary School, a matter discussed in the emerging Goring Neighbourhood Plan. The school and diocese have identified that such expansion would require the school to be relocated, which would require a suitable site, as well as funding, being provided.	Add specific reference to housing numbers in neighbourhood plans being subject to the ability to fund any necessary additional infrastructure such as amending a sentence within 5.30 as follows:  ‘The level of growth proposed should be evidenced within the Neighbourhood Development Plan with local communities helping to shape the development of their village and the amount of growth subject to the identification of viable solutions to related infrastructure constraints including schools’.
93	Policy H8	This policy should highlight the need to ensure that development in smaller villages takes into account the potential impact on the Historic Environment.	The following should be added to this policy: ‘Providing there are no adverse impacts on the significance of heritage assets in accordance with Policy ENV6...’
94	Policy H9	We support the requirements for affordable housing and the commitment to build affordable houses of the required size.  The County Council has a particular interest in respect of Care Leavers who need realistic move on options from the supported housing pathway. Social registered HMOs would provide ideal housing for this group. We anticipate approximately 20 care leavers will seek accommodation in South Oxfordshire within the next 18 months. We also anticipate 3 young families per year will need affordable individual 2 bed accommodation.	No change.
95	5.43 to 5.46	The County Council supports the reference to taking into account Housing Needs Surveys as the County Council undertakes such surveys, for	No change.

		example in relation to vulnerable young people and families.	
96	5.43 to 5.46	The Communities and Local Government publication “Allocation of accommodation: guidance for local housing authorities in England” includes foster carers as a group to whom reasonable preference in housing allocation for affordable housing be given. OCC Children Education and Families service is in acute need of additional foster families in South Oxfordshire and it may be that this should be specifically mentioned in this Plan.	Add examples such as foster carers to paragraph 5.45.
97	Policy H11	We welcome the commitment to provide adapted affordable housing and note the optional Building Regulations (part M). Our housing needs analysis identified a need for approximately 5 adapted supported housing units per year for young people with learning difficulties or Autistic Spectrum Disorder in South Oxfordshire. In addition, we anticipate the need for 2 wheelchair adapted properties per year for young people with enough space for electric wheelchairs to turn and strong enough to support ceiling track hoists.	No change.
98	Policy H20	This policy should highlight the need to ensure that development in smaller villages takes into account the potential impact on the Historic Environment.	The following should be added to section 1 of this policy: ‘Providing there are no adverse impacts on the significance of heritage assets in accordance with Policy ENV6...’

## Chapter 6 - Employment and Economy

	Reference	Comment	Proposed Change
99	6.1 to 6.9	The County Council supports the text which highlights the potential for economic growth having regard to the Strategic Economic Plan (SEP) 2016 and the Local Industrial Strategy (LIS)	No change.

		for which a draft has been submitted to government. Both documents are available on the OxLEP website.	
100	Policy EMP1, EMP2, EMP3, EMP4, EMP5, EMP6, EMP7, EMP8, EMP9, EMP10	<p>The amount and location of sites to be allocated for employment appears to be well-evidenced.</p> <p>Some neighbourhood plans are expected to provide for employment land: Henley-on-Thames 1.0ha; Thame 1.6ha; Wallingford 5.35ha; Crowmarsh Gifford 0.28ha. We expect to be able to respond to these proposals as the neighbourhood plans are produced.</p> <p>The County Council notes that the other site allocations are relatively small and does not raise any objections.</p> <p>The County Council supports Policy EMP10 which requires Community Employment Plans.</p>	No change.

## Chapter 7 - Infrastructure

	Reference	Comment	Proposed Change
101	7.7 to 7.10 and Policy INF1	<p>The County Council supports the Plan's recognition of important infrastructure issues.</p> <p>Policy INF1 appropriately indicates that planning permission will only be granted for developments where the infrastructure and services needed for development are already in place or will be provided to an agreed timescale. An addition to the policy will make it clear that developer funding is still required from development where external funding is used to forward fund infrastructure. A new paragraph should be added following 7.10 to explain this part of this policy.</p>	<p>Refer in paragraph 7.8 to the issues concerning water supply and waste water.</p> <p>Add new paragraphs at the end of paragraph 7.10:</p> <p>'The council along with partners will endeavour where appropriate to identify opportunities to fund (or part fund) infrastructure linked to planned growth and may deliver such infrastructure ahead of development. This could include government funding bids, use of business rates, Council capital funds or monies from the Local Enterprise Partnership. Where funding is secured for infrastructure with an expectation that funding will be</p>

		<p>Paragraph 7.8 should also refer to water supply and sewerage/waste water.</p>	<p>recovered whether via planning obligations, a statutory levy or tariff or other mechanism in respect of development, then the securing of such funding or the completed delivery of the infrastructure ahead of development will not circumvent the need for a development to contribute towards the cost of such infrastructure if such infrastructure is relevant to the development of the site so that the development is acceptable in planning terms.</p> <p>Infrastructure and services, required as a consequence of development, and provision for their maintenance, will be sought from developers, and secured through planning obligations, conditions attached to a planning permission, other agreements, and funding through the Council's Community Infrastructure Levy (CIL) or other mechanisms.</p> <p>Where funding for infrastructure necessary for development has been secured, including where the infrastructure is fully delivered ahead of development on the expectation that such funding shall be recovered from development, proposed developments will be required to contribute towards the cost of the related infrastructure, including retrospective contributions.'</p> <p>Add at the end of point 3 in Policy INF1: 'This applies equally where external funding for infrastructure necessary for development has been secured (including where the infrastructure is delivered ahead of development), on the expectation that funding shall be recovered from development'.</p>
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102	7.11 to 7.17 and policies TRANS1a and TRANS1b	<p>The County Council supports the Plan’s recognition of the strategic transport infrastructure issues and the policies in respect of this. Reference should be made to the proposed Clifton Hampden Bypass, Science Bridge, A4130 widening and third part of Didcot Northern Perimeter Road in addition.</p> <p>The diagram of the ‘OXCAM Corridor’ is not clearly referenced, and would be better replaced with an up to date diagram of the OxCam Expressway corridor as on the Highways England website:</p> <p><a href="https://highwaysengland.co.uk/projects/oxford-to-cambridge-expressway/">https://highwaysengland.co.uk/projects/oxford-to-cambridge-expressway/</a></p> <p>The County Council has concerns about the ambition of neighbouring authorities for a third Thames Crossing at Reading and the potential for park and ride options into Reading. We support paragraph 7.16 which references these, and note that no further reference is required given that these proposals are not advanced.</p> <p>There is an apparent typo in the repetitious text of bullet points vii and vii in Policy Trans 1b.</p>	<p>Include a full list of major transport schemes, not just the Thames River crossing.</p> <p>Update the diagram of the Oxford to Cambridge Expressway corridor.</p> <p>No change to paragraph 7.16 in respect of proposals at Reading.</p> <p>Delete repetition by removing either vii or viii in Policy Trans1b.</p>
103	Policy TRANS2	<p>The County Council supports the Plan’s recognition of the need to promote sustainable transport and accessibility. Specific reference should be added to the County Council’s Walking and Cycling Design Standards: <a href="https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-and-healthy-travel">https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-and-healthy-travel</a></p>	<p>Add reference to Oxfordshire County Council’s Walking and Cycling Design Standards and include footnote with hyperlink.</p>
104	Policy TRANS3	<p>The County Council supports the safeguarding of land for strategic transport schemes proposed. Maps are included in Appendix 5.</p>	<p>Amend reference to ‘Thames River crossing’.</p>

		<p>For consistency purposes, refer to the Thames River crossing rather than road crossing.</p> <p>There is ongoing work on many of the schemes being safeguarded. We will advise the District Council and Inspector if modifications are desirable should there be new evidence prepared before the Examination is complete.</p>	
105	Policy TRANS4	The County Council supports the policy requiring transport assessments, transport statements and travel plans. Some correction is required.	Amend the end of the policy to read: ‘...Guidance; the scope should be agreed with Oxfordshire County Council and where appropriate, Highways England.’
106	Policies TRANS5 TRANS6 and TRANS7	<p>The County Council supports the policy about development proposals in respect of transport; the policy on rail; and the policy on development generating new lorry movements.</p> <p>An amendment is required to Policy TRANS5 to include cycling.</p> <p>An amendment is required to Policy TRANS6 to avoid any misreading of the policy.</p>	<p>Amend part of Policy TRANS5 to read: ‘...including safe walking and cycling routes to nearby bus stops or new bus stops and provide cycle parking at bus stops.’</p> <p>Amend part of Policy TRANS6 to read: ‘Where required, and not covered within the scope of permitted development, planning permission will be granted, subject to other policies being met, for proposals which...’</p>

## Chapter 8 – Natural and Historic Environment

	Reference	Comment	Proposed Change
107	Policy EP3	OCC Waste Management Team welcomes the requirements for new developments to provide sufficient capacity and space for waste management. New developments (and changes of use) should make provision for waste to be reduced or reused prior to being separated and stored for waste collection services. A bolder statement should be included in the plan to encourage	<p>Amend policy to add to i – ‘including internal recycling space and external compost bins’.</p> <p>Include either within this policy or elsewhere in the plan a policy requirement for water butts with new housing development.</p>

		the provision of space inside the home for separating waste and outside the home for compost bins and water butts. Home composting reduces any requirement for the collection and processing of garden waste and some food waste, and the resulting compost can be used on site. This results in considerable financial savings, mitigates carbon emissions and creates environmental benefit.	
108	General	We support the range of policies for the protection and enhancement of the historic environment, the natural environment, the need for biodiversity net gain, protection of the landscape and provision of green infrastructure.	No change.
109	8.3	It would be helpful to note the role that South Oxfordshire landscape and habitats play as part of the wider network across the county.	Amend text to read: 'The whole District is rich in biodiversity, including international, national and locally protected sites and habitats and forms an important part of the wider ecological network across the county.'
110	Policy ENV1 - 2	Public rights of way, including ancient or enclosed routes and national trails, are not included within the special landscape qualities list in the second part. The NPPF paragraph 98 states: 'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'.	Amend Policy ENV1 - 2 to include an additional bullet point referring to public rights of way including ancient or enclosed routes and national trails.
111	Policy ENV2 3 bullet 6	There is a typo in that Conservation Target Areas should be referred to in capitals.	Amend typo: 'Conservation Target Areas'
112	Policy ENV5 and 8.27	The policy and explanatory text for ENV 5 Green Infrastructure do not refer to public rights of way despite	Adjust Policy ENV 5 text and supporting text in 8.27 to specifically

		these paths being the main way for residents and visitors to Oxfordshire to freely gain access to the countryside. Public rights of way are used for sustainable transport choices and quality of life, and many are multi-functional Green Infrastructure assets in their own right.	refer to the importance of public rights of way.
113	Policy ENV12	There is no specific policy on lighting, or noise / vibration, though these are mentioned as a sub-part of ENV12. Both of these can have a direct impact on human health, wellbeing and the environment. They are referred to in AONB management plans, as potential issues that can harm the special qualities of AONBs.	Include further policy on lighting, noise and vibration.
114	Policy DES8 and 9.26	Reference to 'natural capital' should be made as the basis through which the provision of many ecosystem services – water, air quality, wildlife etc, is mediated. The concept of natural capital is referred to in NPPF (2018) e.g. para 171. Reference to natural capital would help tie the Local Plan within a wider context of provision of environmental services across the county.	Amend Policy DES8 1 to read: 'New development is required to make provision for the effective use, protection and enhancement of the district's natural capital where applicable, including...'  Amend 9.26 to read: 'The Council encourages applicants to consider how our existing resources can be used effectively and efficiently when planning and designing development proposals, to protect and where possible enhance natural capital within the district.'
115	Policy EP5 Mineral Safeguarding Areas	The County Council accepts that the District has had regard to the adopted Oxfordshire Minerals and Waste Local Plan, Part 1 – Core Strategy 2017 the Plan. Policy EP5 is supported. This policy indicates that development will normally be directed away from Minerals Safeguarding Areas but where that cannot be avoided, all opportunities for mineral extraction will need to be fully explored. This policy is broadly	Insert an additional paragraph after policy EP5 to say Mineral Safeguarding Areas need to be taken into account in respect of the strategic allocations at Land Adjacent to Culham Science Centre and Land at Berinsfield, and that they also need to be taken into account in preparing Neighbourhood Plans. Mineral Safeguarding Areas should be shown on the Policies Map as is proposed.

		<p>in line with the Mineral and Waste Core Strategy Policy M8.</p> <p>Part of the strategic allocation at Culham and the whole of the Berinsfield strategic allocation are within Minerals Safeguarding Areas for sharp sand and gravel. There are also sharp sand and gravel deposits underlying the Chalgrove Airfield strategic allocation although these are not safeguarded. In addition, development sites which arise from neighbourhood plans may be within or affect mineral safeguarding areas. In particular, there are potential concerns in Wallingford, Benson and Cholsey. Government planning practice guidance on Minerals is to show Mineral Safeguarding Areas on District Local Plan policies maps and this could help in this case.</p> <p>In accordance with Policy EP5, it will be necessary for applicants to consider the opportunities for mineral extraction prior to developing sites within mineral safeguarding areas for housing or other development; and to consider how development of sites that affect safeguarded minerals might take place without restricting potential mineral extraction at other sites nearby. Additional text to support Policy EP5, should be included to clearly set this out.</p>	
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## Appendices

	Reference	Comment	Proposed Change
116	Appendix 5 Safeguarding	The County Council generally supports safeguarding for transport schemes. Support for safeguarding does not mean that there is commitment to funding a scheme.	No change.

117	Appendix 5 Safeguarding	The route for the Oxford to Cambridge Expressway has yet to be identified. Route options within a corridor (which involves two alternatives around Oxford) are proposed to be identified for consultation in Autumn 2019. If Highways England proposes a route which includes land within South Oxfordshire, the scheme route could in future be protected by safeguarding in a review of the Local Plan or Joint Strategic Spatial Plan.	No change.
118	Appendix 5 Safeguarding A4130 road safety improvements	A small area of safeguarding is proposed west of Brightwell-cum-Sotwell around the junction of the Wallingford Road. Developer funding has been sought towards these improvements and the County Council intends to carry out some realigning for safety purposes when funding allows. The scheme 'providing improvements to the A4130 between Didcot and Wallingford' is included in the County Council's LTP4 at SV 2.15.	No change.
119	Appendix 5 Safeguarding A Bypass for Southern Abingdon	This area of safeguarding mirrors that contained in the Vale of White Horse Local Plan Part 1, with only a small part of the scheme within South Oxfordshire. The land is safeguarded to provide for the possibility of a major new road in this location should it become necessary and feasible. Advice from the County Council on archaeological assessment will need to be sought. Funding for such a road is not currently being sought as it is not identified as being required for proposed development in either the Vale of White Horse or South Oxfordshire. The need for safeguarding is included in SV4.2 of LTP4.	No change.
120	Appendix 5 Safeguarding A Bypass for Benson	This safeguarding has arisen from a neighbourhood plan. The County Council is content with the identification of the route and has indicated that some Housing and Growth Deal funding can be directed	No change.

		to this bypass, assuming that developers are largely providing the scheme.	
121	Appendix 5 Safeguarding Clifton Hampden Bypass	This is one of the schemes in the Didcot Garden Town HIF bid and the scheme is being developed to support growth identified in this Local Plan.	No change.
122	Appendix 5 Safeguarding A new Thames road crossing between Cuham and Didcot Garden Town.	We support the two alternative options shown as being safeguarded which mirrors the Vale of White Horse Local Plan Part 2. The Didcot Garden Town HIF bid has identified a preference for the western alignment. The title should be changed to: Thames River crossing between Culham and Didcot. The delivery is required in SV 2.16 of our LTP4 to improve connectivity and increase capacity for north/south movements.	Change title to 'Thames River crossing between Culham and Didcot'.
123	Appendix 5 Safeguarding Didcot Central transport corridor improvements	This safeguarding is proposed to enable bus priority and other public realm and sustainable transport measures. The District Council is leading in respect of this. The project is mentioned in SV3.3 of our LTP4.	No change.
124	Appendix 5 Safeguarding Didcot Northern Perimeter Road	The area safeguarded between Hadden Hill A4130 and Lady Grove is known as NPR3 – the third part of the Didcot Northern Perimeter Road. Funding has been achieved for this and work is ongoing on detailed design. The delivery is required in SV 2.7 of LTP4 to support identified growth.  Additional safeguarding has been included for widening along Lady Grove to the B4016. This would provide for widening should it be required in conjunction with an option for the Didcot-Culham River Crossing.	No change.
125	Appendix 5 Safeguarding	This proposal for a new 'outer' Park & Ride site on the A4074 is	No change.

	a new Park and Ride site at Sandford to the south-east of Oxford.	consistent with that proposed in the Oxford Transport Strategy part of the County Council's Local Transport Plan 4.	
126	Appendix 5 Safeguarding Science Bridge	The safeguarding mirrors that in the Vale of White Horse Local Plan Part 1 and only two small sections are in South Oxfordshire. This is one of the schemes in the Didcot Garden Town HIF bid and the scheme is being developed. The delivery is required in SV 2.6 of LTP4 to support identified growth.	No change.
127	Appendix 5 Safeguarding a Bypass for Watlington	This safeguarding has arisen from a neighbourhood plan. The County Council is content with the identification of the route and has indicated that some Housing and Growth Deal funding can be directed to this bypass, assuming that developers are largely providing the scheme.	No change.
128	Appendix 5 A4074/B4015 Golden Balls Junction Improvements	This safeguarding is included as an improvement to the roundabout at Golden Balls and is shown in the Evaluation of Transport Impacts as likely to be needed to support growth in this Local Plan. The delivery of a scheme was also previously required in SV 2.18 of LTP4 to improve connectivity between Science Vale and the Eastern Arc of Oxford.	No change.
129	Appendix 5 Southern Didcot Spine Road	This safeguarding mirrors that in the Vale of White Horse Local Plan Part 1. The Harwell Link Road has been built. A southern Didcot Spine Road has not been shown to be needed to support growth in this Local Plan but would be required if there is development in this location. The area safeguarded extends west of Park Road, but it may be that a Spine Road would be needed further	No change.

		East if development progressed. An application was lodged in 2018 for development (P18/S1278/O) but was withdrawn prior to determination. The need for safeguarding is included in SV 4.1 of LTP4.	
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### Strategic Site Selection Paper (Site Selection Background Paper Part 2)

	Reference	Comment	Proposed Change
130	Overall	The County Council notes with interest this background paper, which assess fifteen sites and utilises information provided by the County Council as a consultee in the process. As the District also utilises information from others and forms its own opinions, there are matters we disagree with, but these are generally addressed in the substance of our comments on the Local Plan itself.	No change as this is a background paper.
131	Page 8	Reference is made to 'transport assessment' having been undertaken. It should be noted that no Transport Assessments have been undertaken. Formal Transport Assessments would follow accepted guidance such as that in the Planning Practice Guidance and would be undertaken in respect of larger planning applications. Only a high-level assessment of transport issues has been undertaken. Desk based studies and site visits were undertaken to investigate the potential transport impacts of the fifteen sites, the results of which have been taken into consideration by the District. Although the document contains some wording which is not fully agreed, the County Council is content with the outcome of the seven sites being taken forward and the omission of the other eight sites. More detailed transport work is	No change as this is a background paper.

		required to understand the full cumulative impact of the seven sites.	
132	Page 74-81	This table summarises why each of the nine sites that were subject to detailed appraisal was either recommended for allocation or not. The County Council generally agrees with this summary table which recommends the allocation of seven sites. The County Council supports the analysis and recommendations not to allocate the two other sites subject to detailed appraisal at Harrington and Thornhill.	No change.

### Sustainability Appraisal (SA)

	Reference	Comment	Proposed Change
133	Table NTS.4	This section has identified a minor negative effect on the historic environment for a number of sites. In respect of Harrington, there has been no archaeological investigation on this very large site and as such there is insufficient information to support this assessment. This is repeated for a number of other sites. There is a high possibility of significant constraints to development at Harrington, Wick Farm, Lower Elsfield, Northfield and Berinsfield. All of these sites have potential constraints and further information in the form of archaeological investigation will need to be obtained before the impact on these sites can be understood.	The SA should be revised to make sure that the assessment of the impact of these proposals on the historic environment is based on sufficient and suitable information. Where information is not sufficient to appropriately assess this impact, the SA should make this clear.
134	3.1.2	The Cultural Heritage section of the SA appears to have only considered designated assets. This is not in line with the NPPF.	The SA should be revised to include information from the HER as set out in the NPPF. This has been summarised in heritage papers produced by Oxford Archaeology. A new, updated assessment is currently being undertaken by John Moore Heritage Services for the

			District. These assessments should be consulted and the information included in the SA.
135	Table NTS.4 Summary of Performance Against the SA objectives for Strategic Sites, p.15 and supporting rationale in Appendix I, pp.570-803	<p>The County Council considers the conclusions drawn in relation to SA Objective 6 which is 'To improve travel choice and accessibility, reduce the need to travel by car and shorten the length and duration of journeys', to be based on inconsistent rationale and insufficient evidence.</p> <p>For example, Harrington, Lower Elsfeld, Wick Farm, Thornhill, Grenoble Road, Culham Science Village, and Northfield all received a score of 'Significant Positive Effect' with respect to SA Objective, despite there being clear and significant differences in the transport/ accessibility characteristics of each site.</p> <p>More specifically, the strategic sites on the periphery of Oxford have all been given the same score, in part based on their proximity to Oxford. Whilst this does superficially mean that walking and cycling may be more realistic options for short distances, there are significant disparities in the opportunities for achieving viable public transport provision for each site.</p> <p>Grenoble Road is of sufficient scale to make public transport more viable (supported by contributions that will be sought to improve service frequency). It is also helped by virtue of its location with respect to planned strategic bus routes.</p> <p>Northfield also benefits from being on the route of an existing bus service, thus making frequency</p>	The SA should be revised to better consider the differences between sites and their scoring in relation to transport.

		<p>improvements much more straight-forward.</p> <p>Conversely, the Lower Elsfield/Wick Farm area (now referred to as Land North of Bayswater Brook), presents significant challenges with respect to bus provision given the difficulties associated with the potential to reroute existing services currently serving Barton and also the significant congestion issues at Headington Roundabout, which cause operational issues to existing services.</p> <p>The assessments in the SA should therefore be approached with appropriate caution, or amended.</p>	
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### Transport Topic Paper

	Reference	Comment	Proposed Change
136	4.8 onwards	This background paper is noted with interest. The County Council is not commenting on the substance of the topic paper but notes that some paragraphs are incorrectly numbered, and paragraph 4.8 has an error as it omits Clifton Hampden Bypass from the list.	Correct errors including paragraph numbering and ensure Clifton Hampden Bypass is included in the list.

### Infrastructure Delivery Plan

	Reference	Comment	Proposed Change
137	Overall	The County Council has provided input to the Infrastructure Delivery Plan. The current version is significantly improved on that previously available. As the Infrastructure Delivery Plan is a 'living document' and a new one can be produced at any time, we recommend that a new version with	Corrections, updating and improvements as set out below.

		amendments is prepared as soon as possible.	
138	5.1 to 5.7	The text identifies key infrastructure requirements, but does not mention that Transport Assessments will be required before all infrastructure can be identified.	Add to each site text: 'other mitigation measures may be required as identified through an agreed transport assessment'.
139	5.1 Berinsfield	The comments about primary school provision should be amended to reflect the various permutations possible.	<p>Add: 'Further consultation is required to identify the preferred solution for primary school capacity serving Berinsfield, which may require the relocation of the existing Abbey Woods Primary School and/or a second school for Berinsfield.'</p> <p>Change first bullet point to two as follows:</p> <p>'One primary school, expected to be 2 forms of entry, including early years provision, to meet the needs of the additional housing. Site area 3.01ha to allow expansion to 3 forms of entry.</p> <p>A second primary school site of 2.22ha to be protected to allow for the relocation of the existing school, should that be the outcome of local consultation. Possible expansion of the existing Abbey Woods Primary School.'</p>
140	5.2 Chalgrove	Second bullet point needs minor correction.	Change 'Icknield secondary school)' to 'Icknield Community College (subject to the approval of the Regional Schools Commissioner).'
141	5.4 Grenoble Road	Once the final expected population generation estimate has been confirmed, it may be that a single 3 form entry primary school is more viable than two new schools, so at this stage, protecting one of the two school sites to be 3.01ha provides more flexibility.	Change first bullet to read: 'Two new 2 Form Entry primary schools, or one new 3 form entry primary school, including early years provision, depending on the population generation estimated. A second primary school site of 2.22ha to be protected until population generation is known through any planning application.'

142	5.5 Bayswater Brook	The school solution for this development may be a smaller new school, in conjunction with expansion of the new Barton Park Primary School (due to open 2020), depending on the final estimates of population generation.	Change first bullet to 'One 2 Form Entry primary school including early years provision, or a smaller school with expansion of an existing nearby school.'
143	All appendices	The County Council supports the specific references to the need to make contributions to improvements to the PROW network for each site. This is in accordance with a number of the general policies in the Local Plan even though it has occasionally not been referenced in the Local Plan site policies.	No change.
144	Appendix 1.2	The County Council appreciates the inclusion of the housing trajectories in this document as it helps to explain the housing numbers contained in the Local Plan. The County Council considers it likely that some sites such as South of Grenoble Road, could advance more quickly than identified, while the trajectory is optimistic in respect of other sites such as North of Bayswater Brook, where the transport issues are significant and the likely mitigation is not yet identified.	Amend housing trajectories when updating the document based on the latest information.
145	App 2.1 - Infra: Berinsfield BER16 and BER17	BER16 and BER17 need to more accurately reflect the complexity of options. Two new primary schools will only be necessary if one of the schools is a relocated Abbey Woods Primary School, in which case the existing school site would be released for other uses. Another option would be the expansion of the existing Abbey Woods Primary School plus one new school, which would be expected to be up to 2 forms of entry. A third option is one new school at 3FE for the entire	Combine BER16 and BER 17 and amend along the following lines, or as agreed following further discussion: 'Sufficient primary education provision to meet the needs of the local population, through a combination of new school(s) and/or expansion of Abbey Woods Primary School (possibly through relocation). Two sites required to be protected: 1 x 3.01ha and 1 x 2.22ha.

		<p>village, but this option will only be available if the population projections indicate that only three forms of entry are necessary.</p> <p>The decision will need to be informed by final population generation estimates, local consultation, and the approval of the Regional Schools Commissioner.</p> <p>At this stage, two sites should be protected, one for a 3fe and one for a 2fe school, to ensure flexibility for local education aspirations to be met in the most viable and sustainable way.</p>	<p>Approximate cost £14,000,000 (based on a 3-form entry school). An additional amount will be required for a relocated or improved Abbey Woods Academy.'</p>
146	App 2.1 - Infra: Berinsfield BER20	<p>BER20 incorrectly does not reference the need for cycle route improvements to Culham.</p>	<p>Amend text to: 'This will include, but is not limited to, significant improvements to the cycle route between Berinsfield and Culham, and a new cycle route between Berinsfield and Oxford'.</p>
147	App 2.4 - Infra: Grenoble GRE14	<p>GRE14 comment should be amended in line with other sites providing secondary schools.</p>	<p>Delete 'which will have an initial capacity of 600 students with the capability to expand to meet future needs.' This will then read: 'Sufficient land will be required in order to deliver a secondary school on-site.'</p>
148	App 2.7 - Infra: Wheatley WHE06	<p>WHE06 includes: 'OCC has stated that school capacity can accommodate up to 500 new households but there are concerns over development beyond this number.' This is not correct, although it is correct that considering all relevant matters, an objection was not raised on an application for 500 new homes. Current pupil forecasts suggest that the pupil generation from 500 new homes would be likely to exceed the expected spare capacity which would be available, but forecasts are updated on an annual basis, reflecting changes in underlying</p>	<p>Change to 'OCC has stated that school capacity can accommodate around 300- 500 new households but there are concerns over development beyond this number.'</p>

		demographics as well as housing growth.	
149	App 2.7 - Infra: Wheatley WHE06	WHE12 details improvements to walking and cycling provision and includes the text: 'To include a range of improvements to upgrade pedestrian/ cycle access to site. Specifics to be agreed with the County Council, including but not limited to new crossing facilities, drop-kerb improvements, footway widening, street lighting upgrades, new signage, and footway improvements on the A40 Holloway Road overbridge.' This list is not complete.	To include all improvements presently identified by Oxfordshire County Council, the text should be changed to: 'To include a range of improvements to upgrade pedestrian/ cycle access to site. Specifics to be agreed with the County Council, including but not limited to improvements to: walking and cycling provision on A40 overbridge and provision of a zebra crossing to the north of Park Hill/London Road/Holloway Road roundabout; the Park Hill/London Road/Holloway Road roundabout for all modes; pedestrian crossing facility on Church Road to the west of Holloway Road junction; widening of footway on northern side of Littleworth Road; cycling facilities at Holton turn and at western access to site (Holloway Road); improvements to cycleway on northern side of A40; widening of existing footway on Waterperry Road; provision of street lighting along A40 underpass and along the Old London Road (east); new pedestrian crossing on Waterperry Road near junction with Old London Road; new footway along Old London Road between junctions with Waterperry Road and London Road; widening of existing footway on northern side of London Road eastwards of junction with Old London Road; provide appropriate pedestrian crossing facility over London Road; widening of existing footway along northern side of Old London Road from junction with Waterperry Road westwards to junction with London Road; relocation of the zebra crossing on London Road to the west of Anson Close and removal of the informal crossing; other improvements to signage and provision of dropped kerbs where appropriate.'

150	App 2.8 - Infra: Didcot	DID13 states 'Didcot North East: One new 8 Form Entry secondary school (may include sixth form depending on demand).' An 8 FE school would usually be expected to have a sixth form, and this comment is inconsistent with other entries.	Delete '(may include sixth form depending on demand)'.
151	Appendix 2.9 District- wide	DWI39 incorrectly leaves Chalgrove Airfield out of the list in respect of helping to fund the Golden Balls junction upgrade.	Amend text to: 'A number of sites will contribute to this infrastructure, including Chalgrove Airfield, Berinsfield, Culham, Grenoble Road and Northfield.'
152	Appendix 2.9 District- wide	The current Dec 2018 estimated cost for the Culham-Didcot Thames River Crossing mentioned in DWI40 is £119,787,000.	Change: '74,000,000' to '119,787,000'
153	Appendix 2.9 District- wide	The current Dec 2018 estimated cost for the Clifton Hampden Bypass mentioned in DWI41 is £25,606,000.	Change: '22,700,000' to '25,606,000'.
154	Appendix 2.9 District- wide	The current Dec 2018 estimated cost for the Science Bridge and A4130 Capacity Improvement mentioned in DWI47 is £49,833,000 + £21,468,000.	Change: '43,170,000' to '71,301,000'.

### Sustainable Transport Study (STS)

	Reference	Comment	Proposed Change
155	The whole document	<p>The Sustainable Transport Study for New Developments, September 2017, provides an initial look at the sustainable transport challenges associated with some of the additional sites. The study does not comprehensively identify all of the issues or interventions required. This is recognised in the Executive Summary itself. Furthermore, some of the proposals put forward are not supported by adequate evidence and may not be taken forward.</p> <p>As a result of a lack of sufficient evidence, the STS makes some assertions with which the County</p>	No change as this is a background paper.

		Council does not agree. The document should therefore only be regarded as guidance prepared at a particular point in time, rather than the definitive view on the advantages and disadvantages of the schemes and interventions it discusses.	
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### Evaluation of Transport Impacts

	Reference	Comment	Proposed Change
156	Overall	The County Council has been involved in the production of the Evaluation of Transport Impacts over a number of years. We agree that the ETI is part of a proportional evidence base for a Local Plan. The results do not constitute full assessment of individual sites. Transport Assessments following an agreed scope are required to assess the full extent of impacts.	No change as this is an evidence paper prepared in respect of the information available at that time.

**COMMENTS FROM OXFORDSHIRE COUNTY COUNCIL CAPITAL INVESTMENT AND DELIVERY  
(OCC CID) RELATING TO NORTHFIELD**

1. These representations are submitted on behalf of Oxfordshire County Council Capital Investment & Delivery (hereafter OCC CID) in relation to land at Guydens Farm which forms part of the strategic allocation site known as 'Northfield'.
2. OCC CID is working with Gallagher Estates (who represent Brasenose College, the owners of the remainder of the strategic allocation site) to ensure a coordinated and masterplanned approach to the development of the Northfield site. OCC CID supports the allocation of their land at Guydens Farm (Northfield – STRAT12) as part of a mixed-use strategic site in the Plan. Notwithstanding this they have a number of concerns relating to the detail contained in draft policy STRAT12 and draft policy STRAT5.
3. The background evidence, including the Sustainability Appraisal, Site Selection Background Papers and Green Belt Assessment of Strategic Sites support the allocation.
4. The trajectory for the Northfield site at Appendix 1.2 of the Infrastructure Delivery Plan is somewhat pessimistic given that there are a limited number of landowners involved, all of whom are working towards the early delivery of development on this site, and the main site promoter (Gallagher Estates) has considerable experience in delivering development of strategic sites.
5. It is considered that the Northfield site is clearly viable. The Infrastructure Delivery Plan should be amended and updated to include further detail on infrastructure costs to enable clarity on the various costs.
6. The words 'which is likely to include' within Policy STRAT12 are imprecise. Consideration should be given to reviewing the policy and similar policies to ensure that there is precise wording.
7. The concept plan appears to have been developed by the planning authority without an evidenced constraint-based approach to the layout or disposition of uses. Better layouts than what is represented on the concept plan, which still protect the Green Belt edge, are likely to be possible. The concept plan should be amended, following further work. Consideration should be given to reviewing the policy and similar policies to ensure that the concept plans are not given undue weight.
8. Flexibility is sought in respect of the density requirements in Policy STRAT5 due to a concern that the high-density requirement could undermine the ability of the site's developers to undertake a high-quality standard of design across the site.
9. In summary, whilst the principle of the allocation of site STRAT12 is strongly supported, detailed elements of the Plan, as currently drafted, are not positively prepared, effective or consistent with national policy. Amendments will ensure that those policies that are relevant to the Northfield strategic site will deliver the economic, social and environmental dimensions of sustainable development, in accordance with the requirements of the NPPF.

# South Oxfordshire Local Plan 2034

## Publication Version Representation Form

**Please return by 5pm on Monday 18 February 2019 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

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This form has two parts:

**Part A** – contact details

**Part B** – your comments / participation at oral examination

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### Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

#### 1. Personal Details

#### 2. Agent Details (if applicable)

Title

Mrs

Full Name

Susan Halliwell

Job Title (where relevant)	Director for Planning and Place	
Organisation (where relevant)	Oxfordshire County Council	
Address Line 1	County Hall	
Address Line 2	New Road	
Address Line 3	Oxford	
Postal Town	Oxfordshire	
Postcode	OX1 1ND	
Telephone Number		
Email Address	<a href="mailto:Susan.Halliwell@oxfordshire.gov.uk">Susan.Halliwell@oxfordshire.gov.uk</a> And <a href="mailto:Lynette.Hughes@oxfordshire.gov.uk">Lynette.Hughes@oxfordshire.gov.uk</a>	

**Part B – Please use a separate sheet for each representation**

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

See attached

Do you consider the Local Plan and supporting documents:

(1) are legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
(2) are sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't know	<input type="checkbox"/>
(3) comply with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

See attached

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

See attached

Would you like to participate at the oral part of the examination, which takes place as part of the examination process? \*

(Continue on page 4 if necessary)

Yes

No

\* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:



(this can be electronic)

Date: 15 February 2019

### Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The

inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection)

### Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

See attached

**Alternative formats of this form are available on request.** Please email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) or call 01235 422600 (Text phone users add 18001 before you dial).

**Please return this form by 5pm on Monday 18 February 2019 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk).