



Supplement for

OVERVIEW AND SCRUTINY COMMITTEE - WEDNESDAY, 4TH MARCH, 2026

Agenda No    Item

7.    National Planning Policy Framework: Proposed reforms and other changes to the planning system (Pages 3 - 96)

Annex A is included in this pack

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## Annex A – Draft Consultation Responses

### **1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?**

West Oxfordshire District Council has a number of concerns regarding the introduction of statutory National Development Management Policies (NDMPs).

The Council considers that NDMPs should remain non-statutory unless and until there is clear and compelling evidence that the current approach is ineffective or giving rise to significant unintended consequences. At present, it has not been demonstrated that elevating such policies to statutory status is necessary to achieve the Government's stated objectives.

The Council is concerned that making NDMPs statutory could reduce local flexibility and undermine the ability of local planning authorities to respond to locally specific circumstances, which is a fundamental principle of the plan-led system. Any shift in status would need to be clearly justified and proportionate.

This position should be kept under review as further evidence becomes available.

Should a future decision be taken to proceed with statutory NDMPs, it would be essential to introduce appropriate transitional arrangements. These would need to allow local planning authorities sufficient time to review and, where necessary, amend their development plans, update internal processes, and adjust decision-making procedures to ensure clarity, consistency and legal robustness.

### **2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

#### **a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council partly agrees with the proposed new format and structure of the draft Framework, comprising separate plan-making policies and national decision-making policies.

Officers have found the draft text clear and relatively easy to follow, both in terms of its plan-making and decision-making components. The separation of policies in this way provides greater clarity regarding their intended purpose and application.

In particular, the plan-making policies are helpful in guiding the content and preparation of development plans and are therefore welcomed.

The Council recognises that the decision-making policies are, in principle, helpful in providing national consistency. However, as outlined in response to Question 1, the Council does not support these policies becoming statutory in the absence of clear evidence that such an approach is necessary.

The Council also has residual concerns regarding the lack of transitional arrangements for the decision-making policies, which are proposed to take effect immediately upon publication of the final Framework. This approach risks rendering certain adopted local plan policies - including relatively recently adopted policies - out of date or subject to significantly reduced weight in decision-making.

Such an outcome would undermine plan-led decision-making and create uncertainty for local authorities, applicants and communities.

More appropriate transitional arrangements should therefore be put in place to allow local planning authorities sufficient time to review and align their development plans with the revised Framework in an orderly and plan-led manner.

Additionally, the Council considers that the natural environment chapter (Chapter 19) should be given higher prominence in the Framework, particularly in relation to the dual crises of climate and nature. While climate is addressed in Chapter 5, the natural environment chapter is currently presented much later in the document, which underplays the intrinsic link between the two.

The draft NPPF fails to adequately recognise this fundamental relationship, and giving the natural environment greater prominence would better reflect the urgency and interconnected nature of environmental and climate challenges.

**3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council broadly welcomes the proposed set of annexes to be incorporated into the draft Framework.

The Council supports the inclusion of additional guidance within the Framework itself, particularly where this consolidates information that is currently contained within separate Planning Practice Guidance. Bringing relevant material together in a single document should improve clarity, accessibility and usability for plan-makers, decision-makers and applicants.

The Council also strongly supports the principle of standardised viability inputs. A more consistent and transparent approach to viability assessment will assist in improving certainty for all parties, reduce disputes, and streamline the plan-making and decision-making processes.

However, the Council has concerns regarding certain specific annexes.

In particular, the annex relating to implementation raises concerns due to the absence of meaningful transitional arrangements for the proposed decision-making policies. As noted in response to earlier questions, the immediate application of such policies risks undermining recently adopted development plan documents and creating uncertainty in decision-making. This is especially problematic where significant resources have recently been committed to plan preparation in accordance with national policy in force at the time.

The Council is also concerned about the proposed superseding of the Written Ministerial Statement Planning – Local Energy Efficiency Standards Update (13 December 2023), which has directly informed the very recently adopted Salt Cross Area Action Plan. The removal or dilution of this policy basis risks creating uncertainty and undermining locally justified and examined policy approaches.

Finally, the Council considers that the level of information proposed to be required in support of planning applications is insufficient. Officers are concerned that the reduced evidential requirements could hamper the ability of local planning authorities to robustly scrutinise applications and make well-informed, legally sound decisions. Ensuring proportionate but adequate supporting information is critical to maintaining confidence in the planning process.

In summary, while the inclusion of the annexes is welcomed in principle, further refinement is required to address these specific concerns.

**4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council agrees with the proposal to incorporate Planning Policy for Traveller Sites within the draft Framework.

The Council supports the principle of consolidating national planning policy into a single, comprehensive document. There appears to be limited justification for maintaining a separate policy document when its content can be seamlessly integrated within the Framework.

Incorporation would improve clarity, accessibility and ease of reference for plan-makers, decision-makers, applicants and communities.

The proposed update to the Framework provides an appropriate and timely opportunity to rationalise national policy in this way.

**5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports, in principle, the proposed simplification of terminology within the Framework where weight is intended to be applied.

A more consistent approach to the use of terminology should assist plan-makers, decision-makers and applicants in understanding national policy expectations and may help to reduce ambiguity and unnecessary debate regarding the interpretation of different expressions of weight. The intention to avoid implying an unintended hierarchy between terms such as “great”, “significant” and “substantial” is understood and welcomed.

However, the Council considers that care will be needed to ensure that the term “substantial” is applied consistently and does not inadvertently alter the meaning or strength of existing policy expectations. In some contexts, the term has an established meaning through case law and appeal decisions, and any shift in wording should not create uncertainty or unintended consequences.

Subject to these caveats, the Council supports the principle of simplifying and standardising terminology in the interests of clarity and consistency.

**6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council partly agrees with the proposed role, purpose and content of Spatial Development Strategies (SDSs) as set out in draft Policy PM1.

In principle, the Council supports the introduction of sub-regional planning through SDSs. A strategic framework at this scale has the potential to provide greater clarity and certainty in addressing cross-boundary matters such as housing provision, economic growth, strategic infrastructure and nature recovery.

Done effectively, SDSs could strengthen alignment between authorities and ensure that strategic priorities are considered comprehensively and consistently across functional geographies.

WODC also supports the broad scope and indicative content of SDSs set out in draft Policy PM1. The proposed focus on strategic-scale issues and the establishment of an overarching spatial framework is appropriate to the intended purpose of these documents.

However, the Council has concerns regarding the suggestion that SDSs should identify broad locations for strategic development, including new settlements and urban extensions.

While an agreed sub-regional spatial strategy should establish the overall distribution and scale of growth, the identification of specific broad locations for development should remain the responsibility of Local Plans.

Local planning authorities are best placed to assess site-specific constraints, infrastructure capacity, environmental considerations and community impacts in detail.

Allowing SDSs to define broad development locations risks blurring the distinction between strategic and local plan-making functions and could undermine the role of Local Plans.

WODC therefore supports the principle of SDSs and their strategic scope but considers that the identification of broad development locations should be clearly positioned as a matter for Local Plans, prepared within the context of an agreed sub-regional strategy.

Furthermore, the Council considers that Policy PM1 should explicitly reference Local Nature Recovery Strategies (LNRS). LNRS provide a spatially represented priority network of habitats and opportunity areas for nature recovery, which is directly relevant to strategic planning. Spatial Development Strategies should therefore be required to have regard to LNRS to ensure that strategic planning decisions actively support nature recovery, complement climate action, and integrate environmental priorities into the spatial framework from the outset.

**7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Partly agree.

**a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?**

West Oxfordshire District Council supports in principle the requirement to review Spatial Development Strategies (SDSs) at least every five years. Given their strategic role in shaping the distribution of growth and investment across a sub-region, it is essential that SDSs remain up to date, evidence-based and responsive to changing circumstances. A regular review cycle will help ensure continued alignment with national policy, infrastructure planning, and the most recent demographic and economic evidence.

However, the Council considers that the need to review or alter an SDS should not be framed solely around changes to housing need or housing requirements. While housing is a central component of any spatial strategy, SDSs are intended to address a broader range of strategic matters.

There may be other significant factors that justify a full or partial review, including changes in economic or employment growth projections, major infrastructure or investment decisions, shifts in environmental or climate policy, updates to transport strategies, or other unforeseen circumstances that materially affect the spatial strategy. Political or governance changes at sub-regional level may also necessitate review.

Accordingly, while WODC strongly supports the principle of reviewing SDSs at least every five years, the framework should allow flexibility for earlier or more fundamental review where wider strategic considerations - not solely housing need - indicate that this is necessary.

**8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need?**  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

In short, SDSs should be updated at least every 5-years and so this question should become a moot point. However, if there are valid reasons as to why this has not been possible in exceptional circumstances, then it would seem appropriate to allow agreed housing requirement figures to be used for the purposes of calculating housing land supply beyond the 5-year period, provided there is no significant change in levels of identified housing across the SDS area.

It would be helpful if the Framework could potentially quantify what might be considered to represent a significant change in the level of housing need (e.g. +/- 10%).

**9) Do you agree with the role, purpose and content of local plans set out in policy PM2?**  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council partly agrees with the proposed role, purpose and content of Local Plans as set out in draft Policy PM2.

The Council supports many aspects of the draft policy, including the requirement for Local Plans to set out a clear vision and framework for future development, to meet identified development needs, and to allocate sufficient land - including broad locations for growth - to deliver the strategy. We also support the proposed emphasis on timely plan preparation and the general approach to processes and procedures, which should help ensure plans are kept up to date and effective.

We remain of the view that the identification of larger strategic locations for growth - such as new settlements and urban extensions should remain the responsibility of Local Plans, albeit within the context of an agreed sub-regional Spatial Development Strategy (SDS).

While SDSs should establish the broad distribution and scale of growth, Local Plans are best placed to undertake the detailed assessment of constraints, infrastructure requirements, environmental impacts and community considerations necessary to identify and allocate specific strategic sites.

The Council also has concerns regarding the proposed ‘narrowing’ of Local Plan content, particularly the suggestion that plans should focus primarily on the delivery of allocated sites and avoid any unnecessary repetition of national decision-making policies. Whilst WODC agrees in principle that duplication of national policy should be avoided, we do not support an approach that limits Local Plans solely to site-specific matters.

Local Plans play an important role in shaping how development responds to local character, environmental constraints, design expectations, infrastructure priorities and other locally specific considerations. Topic-based policies provide clarity for decision-makers, applicants and communities, and ensure that national policy is interpreted and applied in a way that reflects local circumstances. Removing or overly constraining this function risks weakening the plan-led system and reducing transparency.

The same principle applies to neighbourhood plans, many of which focus on locally distinctive policies and development management considerations rather than site allocations. It is important that the reformed framework continues to support this broader role.

Furthermore, the Council notes that the draft Policy PM2 makes limited, if any, reference to the relationship between Local Plans and Local Nature Recovery Strategies (LNRS). This is a concern given the legal duty for local planning authorities to “have regard” to LNRS as part of the planning process, including in the preparation of Local Plans. Explicitly referencing LNRS within Policy PM2 would ensure that Local Plans appropriately integrate spatially represented priorities for habitats and nature recovery, supporting environmental objectives alongside strategic and local development needs.

In summary, while WODC supports the overall direction of draft Policy PM2 and many of its specific provisions, we consider that Local Plans must retain a broader policy-making function beyond the allocation and delivery of specific sites and PM2 must explicitly reflect statutory duties in relation to LNRS to ensure effective, plan-led, and environmentally informed decision-making.

**10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No**

Yes

**a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.**

N/a

**11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Strongly disagree.

**a) Please provide your reasons, particularly if you disagree.**

Whilst the Council agrees in principle that unnecessary repetition of national policy should be avoided, we are concerned that the proposed approach goes significantly further and would unduly restrict the scope and function of Local Plans. As currently framed, the policy risks limiting Local Plans to a narrow focus on site allocation and delivery, reducing their ability to include topic-based policies that reflect local priorities and circumstances.

Local Plans play a critical role in interpreting and applying national policy at the local level. National policy is, by necessity, high-level and generic. Local Plans provide the spatial expression of that policy, ensuring that it is tailored to local environmental constraints, character, infrastructure capacity, design expectations, climate priorities and other locally specific considerations. This is not duplication for its own sake, it is essential to delivering a genuinely plan-led system.

Restricting Local Plans from elaborating on national policy - even where doing so provides clarity, certainty and local specificity - risks creating ambiguity in decision-making and weakening the role of the development plan. It may also lead to greater reliance on case-by-case interpretation, reducing transparency for communities and applicants alike.

The same concern applies to neighbourhood plans, many of which focus on locally distinctive development management policies rather than site allocations. An overly narrow interpretation of “duplication” could undermine their effectiveness and community confidence in the planning system.

For these reasons, WODC strongly disagrees with the proposed approach in Policy PM6(1c). Local Plans must retain the ability to include locally specific topic-based policies provided these build upon or provide additional clarity to national policy, in order to ensure robust, transparent and locally responsive decision-making.

**12) Do you agree with the approach to initiating plan-making in PM7?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree**

The proposed approach is supported – particularly the increased emphasis placed on robust project management and effective and regular engagement with key stakeholders.

**13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council strongly supports the proposed approach, in particular the emphasis placed on the use of other existing evidence, shared working and the use of standardised tools and inputs wherever possible. All of this will help to achieve efficiency and resource savings and help contribute to a more streamlined examination process.

**14) Do you agree with the approach to identifying land for development in PM9?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council notes that PM9 sets out a clear and structured approach for assessing and selecting sites for development. However, the policy does not specifically reference Local Nature Recovery Strategies (LNRS) or the opportunities to incorporate environmental priorities when identifying land.

Explicit consideration of LNRS would ensure that development plans can proactively identify land for green infrastructure, nature parks, or other forms of accessible green space, supporting nature recovery alongside housing and economic growth. Integrating these considerations at the site identification stage would help ensure that environmental objectives are delivered in a transparent, consistent, and plan-led manner.

**15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strong agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports the removal of the Duty to Co-Operate and considers that the approach set out in relation to cross-boundary co-operation in the draft Framework is pragmatic and sensible.

It would however be helpful if the text of the Framework (e.g. under Policy PM11) could make it clearer that any concerns regarding a lack of effective co-operation and alignment between local authorities and/or other relevant partners is a matter of soundness that will be capable of being remedied through a local plan examination as opposed to the 'do not pass go' type approach adopted under the previous Duty to Co-Operate.

**16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Whilst Policy PM12 is supported in principle in terms of its intended scope and purpose, as currently worded, it does not provide a great deal of additional clarity or certainty over and above the wording of the current Framework.

The only specific form of provision/contribution mentioned is affordable housing and whilst clearly important, it would be helpful if the policy could be expanded to include mention of other forms of infrastructure – particularly those of strategic significance.

Whilst it is clearly a matter for individual development plans to identify what developer contributions are likely to be sought alongside continued development viability, it would be helpful if the policy wording could be expanded beyond affordable housing only.

**17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

**a) Please provide your reasons, particularly if you disagree.**

Whilst we can see some merit in this being addressed through individual development plans, the circumstances in which development contributions are proposed to be reduced, will often be very similar nationally and we see no reason why this issue could not be robustly addressed within the Framework itself. This could be within the body of the Framework itself or as part of an expanded version of the draft Annex on standardised viability inputs.

In particular, it would provide a helpful opportunity to make it clear that any cost incurred in revisiting the viability of development in light of developer contributions being sought, should, at the planning application stage, be borne by the developer/applicant rather than local planning authorities – with the LPA cost having been incurred at the plan-making stage via a proportionate whole plan viability assessment.

**18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council strongly disagrees with draft Policy PM13 and, in particular, the proposal to commence section 43 of the Deregulation Act 2015 so as to limit the ability of local planning authorities to set local standards relating to energy efficiency.

The effect of this proposal would be to significantly constrain the ability of authorities to respond to locally evidenced priorities - most notably in relation to energy efficiency and net zero carbon development. Restricting local standards to matters of accessibility and water efficiency represents a substantial and regressive step at a time when local authorities are playing a critical role in responding to the climate emergency.

West Oxfordshire District Council formally adopted the Salt Cross Area Action Plan on 25 February 2026 following extensive evidence gathering, viability testing and independent examination. The appointed Inspector concluded that the Council's approach towards its net zero carbon policy was legally compliant and consistent with national policy when considered in the round. The plan has therefore been found sound and deliverable through an independent statutory process.

The proposed changes would, upon publication of the revised Framework, place at risk the implementation of the Salt Cross net zero carbon policy - a policy the Council has worked towards for five years, supported by robust local evidence and examination. This will inevitably weaken confidence in the plan-led system and risk delaying or diluting the delivery of an exemplar garden community.

More broadly, removing the ability of local planning authorities to set locally justified energy efficiency standards would hamstring councils' capacity to respond proportionately to local climate ambitions, viability evidence and community expectations. It would also create tension between national objectives on decarbonisation and the practical tools available to local authorities to help achieve them.

However, the Council welcomes, in principle, the use of Green Infrastructure Standards. These standards provide a clear and consistent framework to support high-quality, multifunctional green infrastructure, enhancing biodiversity, climate resilience, and the wellbeing of local communities. Where appropriately applied, they can complement other local planning standards without undermining energy efficiency ambitions.

For these reasons, WODC strongly disagrees with Policy PM13 and the commencement of section 43 of the Deregulation Act 2015. Local planning authorities must retain the ability to set locally evidenced standards - particularly in relation to energy performance - where these have been demonstrated to be viable, deliverable and subject to independent examination as has been the case with Salt Cross Garden Village.

**19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?**

The proposed tests of soundness relating to SDSs are supported in principle, although we would observe that the test regarding 'effectiveness' is very 'wordy' and not particularly clear. Some re-drafting here would assist.

We welcome the clarity provided that examiners will be able to suggest modifications to enable a strategy to be found to be sound along with the pragmatism to be applied in situations where there may be some uncertainties towards the end of the plan period (e.g. around infrastructure provision).

With regard to the Local Plan tests of soundness, we have no major concerns although would observe that the test of 'realism' could be construed as rather subjective. What is meant by a realistic policy? Reverting to 'effective' with reference to cross-boundary working on strategic matters may be more appropriate.

We also note that as currently drafted, the text suggests that Local Plan examiners will not consider whether any relevant procedural requirements have been met (unlike for SDSs). This is presumably not the case and should be corrected.

The text could also usefully be expanded to include the same references set out under Policy PM 14 relating to potential uncertainties later in the plan period and the ability of examiners to recommend main modifications to achieve a sound plan. Otherwise, as drafted, it could be taken that Local Plan examiners will not recommend modifications and will expect absolute certainty over a full 15-year period, which, again, is presumably not intended to be the case.

**20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?**

Overall, the proposals in the plan-making are supported in principle, but West Oxfordshire District Council has strong concerns regarding the following key aspects:

- Over-centralisation of decision-making policy
- Concern that statutory national policies could displace locally specific policy interpretation.
- Risk of increased uncertainty and reduced transparency.
- Blurring of roles between SDSs and Local Plans
- Spatial Development Strategies identifying broad locations for development (e.g. new settlements, urban extensions). Strategic distribution should sit with SDSs, but site identification should remain with Local Plans.
- Overly narrow scope for Local Plans with a concern that Local Plans are being reduced to site allocation/delivery documents.
- Risk of weakening the broader policy-making role of Local Plans and neighbourhood plans.
- Unclear triggers for SDS review. Reviews should not be based solely on housing need changes. Other triggers (economic shifts, infrastructure investment, environmental factors, governance changes) must be recognised.
- Insufficient transitional provisions with risk to recently adopted plans prepared in accordance with existing policy.
- Specific impact on Salt Cross and local energy standards
- Tests of soundness drafting issues. Some wording (e.g. “effectiveness” and “realism”) unclear or potentially subjective.
- Inconsistency between SDS and Local Plan examination provisions.

**21) Do you agree with the principles set out in policy DM1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly disagree.

**a) Please provide your reasons, particularly if you disagree.**

In terms of proposals for major development, the Council is supportive of the emphasis placed on early engagement with relevant parties including proportionate pre-application engagement. Also supported is the requirement for a clear and concise planning statement.

However, as drafted Policy DM1 suggests that the planning statement is the only information needed to support the submission of a planning application for major development which is presumably not intended to be the case and seems to run counter to the information requirements outlined at new Annex C.

There should be a read-across to other relevant decision-making policies and their associated information requirements.

In terms of other 'non-major' development proposals, we have significant concerns about the emphasis proposed to be placed on the 'minimum necessary' information requirements to enable a decision to be made.

**22) Do you agree with the policy DM2 on information requirements for planning applications?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Whilst we are supportive of the principle of removing an unnecessary proliferation of supporting information for smaller development proposals, the shift in emphasis towards a 'bare minimum' type approach is too significant and runs the risk of development proposals being put forward in the absence of sufficient information upon which to make a robust and informed planning decision.

Furthermore, whilst we support the principle of greater national consistency in local validation checklists, restricting any additional local requirements beyond those set out at Annex C to only those matters which are specified in development plan policies is considered a step too far.

We do however support the principle of proportionality and making it clear what information will be required in support of major, medium and other types of development.

**23) Do you have any views on whether such a policy could be better implemented through regulations?**

No specific view.

**24) Do you agree with the principles set out in DM3?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council is generally supportive of the general principles outlined in Policy DM3, much of which reflects actions that many local planning authorities already take, including positive working with applicants and making effective use of pre-application discussions.

We do, however, have concerns around bullet point d), which effectively seeks to minimise the role of statutory or internal consultees. Whilst we fully accept that any such consultation should

be proportionate to the nature of the scheme proposed, as worded, the text downplays the importance of their input to too great an extent.

In some instances, there will be perfectly valid reasons why a consultee response may be received late and, whilst any delays are to be avoided wherever possible, they should not in themselves be seen as a reason to proceed regardless.

We are particularly concerned about changing the process for obtaining statutory and internal consultee responses where there are legal implications arising from a development, such as impacts on protected sites, protected species, and requirements for Biodiversity Net Gain. In these cases, it is imperative that the correct specialist advice is obtained prior to determination. It must be assumed that the reference to “insufficient information to make the decision or more detailed advice may enable an approval” is intended to cover such circumstances, but clarity on this point is essential.

If the correct specialist advice is not secured at the application determination stage, it could result in significant delays further down the line, for example at the discharge of condition stage, or even at the implementation phase of development. Ensuring clarity and safeguarding the input of statutory and internal consultees will protect both the integrity of the decision-making process and the deliverability of development in accordance with legal and environmental requirements.

**25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?**  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council is supportive of the approach set out in Policy DM5 – in particular the emphasis placed on standardised viability inputs, maintaining affordable housing provision and the importance of plan-led viability assessments as the primary starting point for any site-specific discussions. Also, the fact that any such site-specific appraisal should take place by exception which we agree should continue to be the case.

**26) Do you have any further comments on the likely impact of policy DM5: Development viability?**

Bullet point 2 b) relating to site characteristics appears rather superfluous given it is extremely unlikely that these will differ to such an extent that this would impact on viability considerations. The other bullet points a) c) and d) are perfectly reasonable.

**27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?**

While Section 106 agreements are an essential mechanism for securing mitigation and infrastructure, the current process for modifying obligations under Section 106A can be slow, uncertain and resource-intensive. There are several ways the process could be improved:

**1. Clearer National Guidance and Consistency**

Greater national guidance on the circumstances in which modifications are likely to be supported would improve consistency across local planning authorities. At present, approaches vary significantly, which can create uncertainty and delay.

**2. Streamlined Application Process**

The S106A modification process could benefit from a more proportionate and streamlined procedure, especially for non-material or technical amendments (e.g. trigger adjustments, phasing updates, or administrative corrections). A simplified route for minor changes would reduce unnecessary negotiation and legal costs.

**3. Statutory Determination Periods and Deemed Approval**

Although there are statutory timeframes, these are not always adhered to in practice. Stronger adherence to determination periods, or the introduction of a deemed approval mechanism where deadlines are missed (similar to other planning processes), could provide greater certainty.

**4. Encouragement of Standardised Templates and Clauses**

Wider use of standardised Section 106 clauses and drafting templates could reduce the need for subsequent modification and make amendments easier to process where required.

**5. Digitalisation and Transparency**

Improved digital systems for tracking obligations, trigger points, and agreed modifications would enhance transparency and reduce administrative burden for both applicants and authorities.

**a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.**

The main obstacles are considered to include:

- Limited local authority officer and legal resources, leading to prolonged negotiations.
- Lack of clear and consistent national guidance on the tests for modification under Section 106A.
- Protracted viability disputes and absence of agreed review mechanisms.
- Legal complexity of deeds of variation, even for minor or technical amendments.
- Delays in securing agreement from multiple land interests or mortgagees.

- Inconsistent approaches between authorities, creating uncertainty and risk.

Specific potential changes might include:

- Introducing a simplified or fast-track route for non-material or technical amendments.
- Providing clearer statutory tests or national guidance on when modification should be supported.
- Strengthening adherence to statutory determination periods, potentially with deemed approval mechanisms.
- Encouraging use of standardised Section 106 templates and clauses.
- Establishing clearer, more responsive viability review frameworks.

**28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government’s commitment to boosting the supply of affordable housing.**

In advance of any legislative change, the process for modifying planning obligations could be improved through practical and procedural measures aimed at supporting deliverability and affordable housing supply.

Improvements could include:

Clear national guidance encouraging a pragmatic and delivery-focused approach to S106 modifications where viability pressures risk stalling schemes, particularly those with affordable housing obligations.

Greater consistency across authorities, including model approaches to viability reassessment and affordable housing review mechanisms.

Early engagement protocols between applicants and local planning authorities to resolve issues collaboratively before formal S106A applications are submitted.

Use of standardised templates and review clauses to reduce the need for later renegotiation.

Improved resourcing and prioritisation of variation applications linked to active housing delivery.

Enhanced transparency in viability assessments, including agreed inputs and review processes, to minimise dispute and delay.

**a) If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.**

Section 73 is frequently used to amend conditions, including changes to phasing and trigger points that indirectly affect planning obligations. In some cases, it is relied upon to re-open discussions on affordable housing where viability pressures arise post-permission.

The interaction between Section 73 permissions and existing Section 106 agreements can create legal and procedural complexity, particularly where obligations are tied to the original permission.

There is also some inconsistency between authorities in how flexibly Section 73 is applied in relation to linked planning obligations.

Section 73 can provide a useful route to adjust tenure mix, timing of delivery, or trigger points to maintain scheme viability and avoid stalled sites.

However, there is concern that it may be used to reduce affordable housing provision without a transparent or robust reassessment of viability.

Uncertainty over whether a new Section 106 agreement is required following a Section 73 permission can also delay delivery, including affordable housing units.

Greater clarity on how affordable housing obligations should be treated where Section 73 is used would improve certainty for both applicants and local authorities.

**29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

In relation to Policy DM6, the overall approach is supported, particularly its emphasis on necessity, precision, reasonableness and proportionality in the use of planning conditions and obligations.

In particular:

- The clear restatement of the established tests for planning conditions is welcomed, as it reinforces good decision-making practice and reduces the risk of overly burdensome or imprecise conditions.
- The explicit restriction on using conditions to secure financial contributions or land transfer is appropriate and maintains the distinction between conditions and planning obligations.
- The presumption in favour of national model conditions and model planning obligations should improve consistency, reduce drafting time, and limit protracted negotiation.
- The encouragement to avoid unnecessary pre-commencement conditions.
- The requirement to determine condition discharge applications in a timely manner to maintain delivery momentum.

There are however a number of important points to consider, including:

- The need for clear guidance on what constitutes “strong reasons” for departing from model conditions or obligations would help avoid inconsistency between authorities.
- Monitoring and enforcement resourcing will be important to ensure that more precise and streamlined conditions remain effective in practice.
- Where model obligations are used, there should still be flexibility to reflect site-specific viability and delivery considerations, particularly for affordable housing and infrastructure timing.

In relation to Policy DM7, we consider that it provides helpful clarification that planning decisions should focus on land-use acceptability, while avoiding duplication of controls exercised under separate regulatory regimes. The presumption that other regulatory regimes will operate effectively (unless there is clear evidence otherwise) promotes certainty and reduces unnecessary delay or repetition of technical assessments.

Encouraging parallel processing of consents is also considered to be a positive and practical measure that could help streamline delivery and reduce overall determination times.

The provision allowing post-permission changes required by other regimes to be approved, unless they would render the development unacceptable, introduces sensible flexibility and reduces the risk of stalled implementation.

**31) Do you agree with the new intentional unauthorised development policy in policy DM8?**  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

The policy appropriately makes clear that deliberate, intentional unauthorised development is a material consideration in any subsequent retrospective planning application or enforcement appeal, and that it should be given substantial weight.

This is a critical clarification. It ensures that developers or landowners cannot secure a procedural or commercial advantage by knowingly bypassing the planning system and seeking to regularise development after the event. Elevating intentional conduct as a significant factor strengthens deterrence and reinforces the principle that planning permission should be obtained before development is carried out.

The policy also supports public confidence in the integrity and fairness of the planning system by demonstrating that deliberate non-compliance will not be treated as neutral once development has taken place. While decisions must still be based on planning merits, it is entirely appropriate that intentional breach is not sidelined or treated as irrelevant in retrospective consideration. At the same time, the policy retains proportionality by requiring decision-makers to consider enforcement plans, impacts, and overall acceptability, ensuring that decisions remain balanced, transparent and evidence-based.

**32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?**

Yes. Intentional unauthorised development can give rise to a range of harms, including physical and visual impacts on the local environment, loss of amenity to neighbouring properties, harm to heritage assets, and the undermining of local planning policy objectives. There are also wider systemic harms, such as eroding public confidence in the planning system, encouraging further non-compliance, and creating unfair advantages for developers who bypass proper processes.

**a) If so, are there any particular additions or mitigations which we should consider?**

The proposed policy in DM8, which gives substantial weight to intentional breaches when considering retrospective applications, is likely to reduce these harms by acting as a deterrent. However, care should be taken to ensure that the policy is applied proportionately, so that minor or technical breaches where intent is less clear are not treated in the same way as deliberate, significant development without permission.

**33) Do you agree with the new Article 4 direction policy in policy DM10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

We consider that Policy DM10 provides a clear and proportionate framework for the use of Article 4 directions. Limiting their application to situations where it is necessary to protect local amenity or the wellbeing of the area ensures that the removal of permitted development rights is justified and targeted, rather than applied arbitrarily. The requirement for robust evidence underpins transparency and fairness in decision-making, while the stipulation that Article 4 directions should apply to the smallest area possible ensures that restrictions are proportionate and do not unnecessarily hinder development elsewhere.

**34) Do you agree with the proposed approach to setting a spatial strategy in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The proposed approach is largely supported, particularly the emphasis on providing clarity about the location of development, the protection or enhancement of land for specific purposes, and the allocation of sites for housing, infrastructure, and other uses. The use of key diagrams and policies maps to illustrate the spatial strategy is also helpful in improving transparency and understanding for applicants, stakeholders, and the public.

There should perhaps be a greater emphasis on the use of digital tools to effectively illustrate any such strategies in line with the Government’s digital planning agenda.

We also have some concerns regarding the reliance on fixed settlement boundaries. While boundaries can provide clarity, they may be too blunt a tool in certain contexts and could limit flexibility for development that is appropriate in edge-of-settlement or transition areas. Rigid boundaries may also constrain innovative or mixed-use proposals that respond to local circumstances or changing needs over time.

Overall, the spatial strategy approach is positive, but it would benefit from a more nuanced treatment of settlement boundaries to ensure that the strategy is both clear and adaptable to local circumstances.

**35) Do you agree with the proposed definition of settlements in the glossary?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

N/a

**36) Do you agree with the revised approach to the presumption in favour of sustainable development?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Whilst West Oxfordshire District Council supports the removal of the ‘tilted balance’ – the application of which – often rendering even recently adopted local plans out of date, we have concerns around the use of settlement boundaries and an overly simplistic assessment of what will be considered acceptable within and outside any such boundaries.

**37) Do you agree to the proposed approach to development within settlements?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

**a) Please provide your reasons, particularly if you disagree.**

While the policy seeks to streamline decision-making by generally supporting development within settlements, we have significant concerns that it is too blunt a tool and could open the door to potentially unacceptable development pressure within built-up areas, which often have sensitivities such as heritage assets, constrained infrastructure, or ecological and amenity value.

In its current form, the policy risks undermining careful local plan allocations and protections, as it places a presumption in favour of development that could outweigh nuanced assessments of harm. While exceptions are listed, these may not be sufficient to prevent incremental or cumulative impacts on residential amenity, local green space, wildlife habitats, or flood risk management.

By prioritising benefits over potential adverse effects in a broad sense, the policy could inadvertently incentivise development in locations where even small-scale proposals may cause significant harm.

In essence, Policy S4 lacks the precision and safeguards needed to ensure that development within settlements is truly appropriate and context-sensitive. A more nuanced, criteria-based approach is required to balance the need for development with the protection of sensitive areas within built-up settlements.

**38) Do you agree to the proposed approach to development outside settlements?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

We partly agree with Policy S5 as it provides a structured framework for identifying forms of development that may be acceptable in rural and edge-of-settlement locations.

However, we have significant concerns regarding the policy's treatment of development near railway stations. These areas may be highly sensitive, including for example Green Belt, proximity to ancient woodland, or other environmentally or visually constrained land. Without clear safeguards, the policy could create undue pressure for development in locations that are not sustainable or appropriate.

Additionally, criteria i) and j) should be explicitly considered alongside any assessment of unmet housing need that is being addressed through local plan site allocations. If this link is not made, there is a risk that unmet need could drive speculative windfall development in unsustainable locations, rather than ensuring housing delivery through planned, allocated sites. In particular, j (i) and j(ii) should not be applied in isolation but always in the context of local plan allocations, infrastructure capacity, and environmental constraints.

While the policy acknowledges the protection of Green Belt and Local Green Space, further clarity is needed to ensure that highly sensitive land outside settlements is not inadvertently placed under development pressure.

Overall, the policy is broadly supported in principle, but modifications are required to manage environmental sensitivities, reinforce plan-led housing delivery, and prevent unsustainable development pressures near transport hubs.

**39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons.**

We partly agree with the specific categories of development proposed for locations outside settlements and the associated criteria. The policy provides useful clarity on acceptable forms of rural and edge-of-settlement development, including agriculture, forestry, rural businesses, re-use of existing buildings, previously developed land, and development linked to evidenced unmet need. These categories reflect the need to balance development with the protection of sensitive landscapes, environmental assets, and infrastructure capacity.

However, we have concerns that some categories, particularly housing and mixed-use development near railway stations, may place undue pressure on environmentally or visually sensitive land.

In addition, the criteria for addressing unmet housing need should be applied alongside local plan allocations to ensure that development is plan-led and does not encourage speculative windfall schemes in unsustainable locations. Without these safeguards, there is a risk that the policy could inadvertently promote development in areas where adverse effects would outweigh benefits.

We also note that the policy presents an opportunity to define requirements for developments that are purely focused on nature recovery and/or Biodiversity Net Gain, such as habitat banks or other ecological enhancement schemes. At present, these types of development are not explicitly mentioned. Including such provisions would help ensure that strategic nature recovery priorities are integrated into the planning system and that environmental benefits are delivered alongside development, in line with statutory duties and local biodiversity strategies.

**40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly disagree.

**a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.**

We have significant concerns about the proposed approach to development around stations. While focusing on housing and mixed-use development that meets density requirements is sensible in principle, the policy does not adequately recognise that not all stations are equivalent, and that some are located in environmentally sensitive or protected areas. For example, several stations on the North Cotswold Line in West Oxfordshire fall within the Cotswolds National Landscape. Applying the policy uniformly risks placing development

pressure in locations where environmental, landscape, and heritage sensitivities mean such schemes are likely to be inappropriate – particularly at higher densities.

In addition, the policy is too loosely worded regarding the requirement for development to be “physically well related” to a station or the settlement within which a station is located. As drafted, this could allow housing schemes to be promoted in unsuitable locations simply on the basis that a settlement has a station, without sufficient regard to local context, environmental constraints, or infrastructure capacity.

We are not aware of direct evidence that this approach would adversely affect Gypsies, Travellers, or other groups with protected characteristics; however, the risk of speculative development in environmentally sensitive locations could create broader social and environmental pressures, including on access, amenity, and local services.

Overall, the policy in its current form is too permissive and would benefit from stronger safeguards to reflect that stations vary in context and that not all sites near stations are appropriate for development.

**41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?** *Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree.*

Strongly disagree.

**a) If not, please provide your reasons**

The application of this policy should not be contingent upon neighbourhood plans including site allocations. Many neighbourhood plans do not and yet still add a valuable local dimension to the development plan.

As drafted, Policy S6 would effectively open the floodgates to speculative development in areas that do not have a neighbourhood plan in place including site allocations – even when they may have very recently been adopted.

This will act as a complete disincentive to take such plans forward given the significant resource commitments required.

**42) Do you agree with the approach to planning for climate change in policy CC1?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The general provisions of draft Policy CC1 are supported in principle. However, the policy should be expanded to include reference to the setting of local energy efficiency standards alongside water efficiency, as these are essential tools for enabling local authorities to respond effectively to the climate emergency.

A key concern is that the policy does not fully reflect the intrinsic link between climate and nature recovery. While there is a brief reference to “protecting and restoring habitats, which can act as important carbon stores,” the benefits of nature-based solutions extend far wider, including flood mitigation, temperature regulation, soil protection, and biodiversity enhancement. The placement of the natural environment chapter towards the beginning of the document, alongside climate, should be considered to better reflect this interconnection.

This is the first time that the NPPF brings together the key subjects of climate, nature recovery, green infrastructure, and nature-based solutions. However, there is currently no direct recognition that nature recovery itself can contribute meaningfully to climate change mitigation and adaptation. At present, the text only implies that nature-based solutions benefit biodiversity, without acknowledging the reciprocal benefits for climate resilience.

The policy should be revised to make clear that proactive nature recovery is a central part of climate action, rather than a peripheral benefit. Recognising this connection up front would transform the way nature recovery is viewed in planning policy, placing it at the centre of creating healthier, more resilient communities and landscapes for the future.

**43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?**

The general provisions of draft Policy CC2 are supported in principle. However, the policy should go further in relation to fossil fuels. Rather than simply referring to not increasing the extraction of such materials, the policy should make explicit reference to the use of no fossil fuels. This approach has recently been secured by West Oxfordshire District Council in relation to Salt Cross Garden Village, and there is no reason why this principle should not be applied more widely across new development.

In addition, point 2, which mentions the issue of energy efficiency in relation to existing buildings, should be expanded to ensure that substantial weight is also given to the benefits of improving energy efficiency in new buildings, for example through the adoption of space heating standards and energy use intensity targets. Local authorities need these tools to drive meaningful reductions in carbon emissions and support net zero development.

Although it is positive to see point 1(f) included, referring to the creation and restoration of habitats to act as carbon stores, the policy should make a clear and direct link to wider nature recovery efforts. In particular, the implementation of Local Nature Recovery Strategies (LNRS) opportunities and integration with Biodiversity Net Gain (BNG) should be explicitly referenced.

This would ensure that the contribution of nature recovery to climate change mitigation is evident, recognising that restoring and expanding habitats, green infrastructure, and ecological networks can provide measurable carbon sequestration and climate resilience benefits.

**44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Strongly agree.

**a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?**

West Oxfordshire District Council supports the requirement for all major development proposals to submit a Climate Change Adaptation Statement or equivalent. The policy should also strengthen wording to require consideration of climate impacts over the entire design life of the development (e.g., 60–100 years), incorporating flexible and adaptable design approaches such as raised floor levels that allow future flood resilience upgrades, and safeguarding space for potential infrastructure improvements (e.g., larger drainage capacity, shading retrofits).

The policy should expand beyond general references to overheating by requiring a passive cooling hierarchy (orientation, shading, ventilation before mechanical cooling), setting maximum indoor temperature thresholds, mandating minimum urban greening factors or tree canopy coverage targets, and encouraging cool roofs and permeable or light-coloured surfaces. Nature-based and passive solutions should be prioritised wherever possible.

It would be beneficial for the policy to explicitly reference the protection of floodplains. While the current wording refers to locations where the risk of flooding is or can be managed, it is not clear that floodplains would be protected as a priority. Explicit protection of floodplains would deliver multiple benefits, including river restoration, nature recovery, implementation of nature-based solutions, and minimising the impact of future flooding on local communities. At present, the policy relies on cross-reference to the flooding chapter (F4 to F8 in 1a), which creates ambiguity and weakens the clarity of adaptation requirements.

Additionally, 1(d) currently focuses solely on tree planting. While urban tree planting is important for shading and microclimate regulation, adaptation measures should include a wider range of natural green infrastructure. More species-rich grasslands, woodlands, wetlands, and hedgerows can also reduce overheating, absorb sunlight and radiation, support biodiversity, and enhance wider ecosystem services. A sole focus on tree planting risks perverse outcomes and misses opportunities to integrate multiple climate adaptation and nature recovery benefits into development.

**45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons.**

The policy positively acknowledges wildfire risk and identifies relevant contexts, providing helpful spatial triggers for consideration. It also gives practical examples of mitigation measures, which is welcome.

However, the policy lacks clarity and precision in several respects. The phrase “at heightened risk from wildfires” is not clearly defined, making it difficult to determine when the policy should be applied. The policy does not specify whether a site-specific wildfire risk assessment must be submitted, nor does it outline what such an assessment should include, such as prevailing wind direction, topography, access for emergency services, or water supply availability.

While the policy includes mitigation measures focused on layout and vegetation management, it does not address essential building-level resilience measures. These include the use of fire-resistant materials, ember-resistant detailing such as vents, eaves, and roofing, separation distances between structures and surrounding vegetation, and access standards for firefighting vehicles. In addition, there is no requirement for ongoing management plans to maintain defensible space or manage vegetation over the lifetime of the development.

Although the policy sits within a climate adaptation framework, it does not explicitly reference projected increases in wildfire frequency or intensity, nor require future climate scenarios to be considered. Furthermore, the policy does not recognise that the creation and restoration of habitats can play a key role in building resilience to wildfires.

Appropriately managed habitats that store water, act as fire breaks, and maintain diverse vegetation structures can reduce the risk of fire spread while delivering multiple benefits for biodiversity, nature recovery, and wider ecosystem services. Integrating habitat-based approaches alongside conventional building and layout strategies would provide a more holistic and effective approach to wildfire risk management.

#### **46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?**

Wildfire adaptation measures should be embedded within wider good design principles so that resilience is achieved without compromising placemaking, landscape quality or biodiversity.

Defendable space, firebreaks and reduced fuel loads can be integrated into attractive green corridors, public open space and street layouts, ensuring they serve amenity and ecological functions as well as safety purposes.

Building orientation, access routes and boundary treatments should be planned to support emergency access and limit fire pathways while maintaining coherent street scenes. The use of fire-resistant materials and ember-resilient detailing can be incorporated into high-quality architectural design. Importantly, vegetation strategies should balance wildfire risk reduction with climate adaptation goals such as urban cooling and habitat creation.

Additional guidance would be helpful in the form of a clear requirement for site-specific wildfire risk assessments in defined risk areas, mapped evidence identifying zones of heightened risk, and design guidance setting out minimum separation distances, suitable planting palettes, material standards and long-term landscape management expectations. Case studies and illustrated design codes would also support consistent implementation while maintaining overall design quality.

**47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?**

National planning policy should more clearly empower local planning authorities to set locally appropriate energy efficiency and carbon reduction standards for new development, rather than limiting them to the minimum requirements set through Building Regulations. A nationally fixed ceiling risks constraining ambition in areas that have already evidenced viability and local support for higher standards, particularly where authorities have declared climate emergencies or adopted robust local plan policies.

Restricting local discretion would undermine plan-led strategies that seek to secure net zero carbon development through fabric-first performance standards, on-site renewables, and whole-life carbon reduction. It would also create tension with recently adopted plans that were found sound through examination, including the Salt Cross Area Action Plan, which embeds higher environmental performance expectations as a core place-shaping principle. Reverting to a Building Regulations-only approach would therefore run counter to the evidence base and policy direction already endorsed at examination and could place the delivery of genuinely net zero carbon development at risk.

The Framework should instead provide a clear route for authorities to adopt higher operational and embodied carbon standards where supported by evidence of viability and local need, ensuring that national policy sets a strong baseline but does not cap ambition. This would maintain consistency with the plan-led system, provide certainty to developers through locally defined expectations, and support the accelerated transition required to meet national carbon reduction commitments.

In addition, national policy on climate change should explicitly recognise the intrinsic link with nature recovery and take a more holistic approach to tackling the climate and ecological emergencies. Actions that implement Local Nature Recovery Strategies (LNRS) and Biodiversity Net Gain (BNG) can make a measurable contribution to climate regulation and resilience, for example by sequestering carbon, reducing flood risk, moderating temperatures, and enhancing landscape-level ecosystem services.

Integrating these approaches into planning policy ensures that climate action and nature recovery are mutually reinforcing, delivering long-term benefits for both communities and the environment.

**48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The general provisions of Policies HO1 and HO2 are supported in principle. We have concerns about the practicalities of setting housing requirement figures for Neighbourhood Plan areas and further guidance should be provided if this is taken forward.

We also have concerns about the inferences made regarding housing requirement figures being set above housing need figures 'where appropriate'. Whilst we acknowledge that assisting a neighbouring authority in terms of unmet need is likely to represent a valid reason for increasing a housing requirement, we have concerns that the reference to economic development and infrastructure investment is likely to lead to increased pressure on local authorities who are already dealing with very challenging housing need figures as a result of the new standard method.

**49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) If so, what elements should this guidance cover?**

Current guidance on the assessment of affordable housing need is considered adequate as is guidance on the assessment of the needs of travelling communities.

Less clear is guidance on the assessment of people wishing to commission or build their own homes and assessing the needs of families with children including how any such needs should then be reflected in development plan policies.

**50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

We are supportive of the currently separate planning policy for traveller sites being incorporated into the Framework for ease of reference.

**51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) If so, what are the key principles this guidance should establish?**

Updated guidance should establish clear principles, including a standardised methodology for assessing current and future need that distinguishes between permanent, transit and emergency stopping provision. It should clarify the definition of need, including how household formation rates are derived, how concealed or doubled-up households are counted, and how

turnover assumptions should be treated. Guidance should also address how to factor in unauthorised developments and encampments, cross-boundary movements, and the implications of changes to national policy definitions.

The time period for projecting need should align clearly with the development plan period, with expectations for regular review where evidence becomes dated. Authorities should also be guided on how to use a proportionate and culturally sensitive evidence base, including effective engagement with Gypsy and Traveller communities to ensure under-reporting is minimised.

Finally, the guidance should link need assessment to deliverability, setting expectations around identifying a supply of specific, developable sites and realistic lead-in times, so that requirement figures are credible and capable of being met in practice.

**52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Annex D is clear but the District Council has significant concerns about the principle of applying a 20% buffer in any circumstances given the challenges presented to most local authorities under the new standard method.

**53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

N/a

**54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

It would be helpful if the text of the Framework were to clarify that no buffer will be applied in relation to traveller sites and 5-year housing land supply requirements.

**55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

**a) Please provide your reasons, particularly if you disagree.**

While Policy HO4 provides a helpful high-level framework, the plan-making requirements are not sufficiently clear or precise to ensure consistent and effective implementation, particularly for developments of strategic scale and complexity.

The policy rightly emphasises infrastructure alignment, sustainable community principles and environmental safeguards, and it refers to design tools such as masterplans and design codes. However, it lacks clarity in several key respects.

First, there is limited guidance on how authorities should evidence that infrastructure can be delivered “at appropriate points” in the development trajectory. The policy does not clearly set out expectations around infrastructure funding strategies, delivery mechanisms, contingency planning, or the role of infrastructure providers. For schemes comparable in scale to new settlements, greater certainty is needed around phasing.

Second, while reference is made to “New Town principles,” there is no definition or cross-reference to a recognised framework. Without clearer articulation, this risks inconsistent interpretation at examination and during masterplanning.

Third, the requirement to support a sustainable community “without expecting an unrealistic level of self-containment” is conceptually sound but imprecise. The policy does not explain how authorities should assess what level of employment, retail, education or community provision is proportionate at different scales of growth, nor how this should evolve over time.

Fourth, although the policy refers to delivery mechanisms such as joint ventures and development corporations, it stops short of setting expectations for governance, long-term stewardship, land value capture, or community ownership models - all of which are often critical to the success of large-scale developments.

**56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

The proposed changes to the definition of Designated Rural Areas are a positive step and are likely to improve the ability of local authorities to secure social and affordable housing contributions from minor development in smaller, less densely populated parishes. Allowing affordable housing requirements to apply to developments below the major development threshold in settlements of 3,000 people or fewer (with low population density) should help address persistent under-delivery in rural areas, where sites are typically small and opportunities to secure contributions are otherwise limited.

However, while this expanded definition strengthens policy tools, it may not in itself be sufficient to significantly increase delivery. Viability constraints on small rural schemes, limited land supply, and land value expectations can still restrict the scale of affordable provision. Without complementary measures such as stronger support for rural exception sites, clearer

guidance on proportionate viability assessment for small schemes, and mechanisms to support registered providers in high-value rural markets, the practical impact may be uneven.

There is also a need for clarity on how the revised definition will operate alongside Section 157 of the Housing Act 1985 designations, to avoid confusion and ensure consistency in application.

The concern is that if the terminology overlaps but the geographic coverage or legal basis differs, it could create confusion for plan-makers, applicants and decision-makers.

**57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

**a) Please provide your reasons, and would you support an alternative minimum percentage requirement?**

The Government previously suggested that all new homes would be required to be built to Part M4(2) standards and so setting a minimum target of 40% is a retrograde step.

Achieving Part M4(2) standards represents a very modest additional cost and would have no effect on viability. It should therefore be a standard requirement in all new homes.

**59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

This is vital to ensuring that specialist provision (e.g. travelling communities and specialist older persons housing) is able to come forward. Such uses are often out-competed by mainstream housing provision and if they are to come forward, it is essential that specific sites or parts of specific sites are allocated specifically.

**60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?**

The principle of encouraging a broader mix of tenures on larger sites is supported although as currently worded in the draft Framework is not explicit. The text as currently drafted simply requires local authorities to set out policies for the mix of tenures to be provided on sites of 150+

What it should say is that for all larger sites of 150+ units, local authorities will be expected to require a broad range of tenures to meet identified needs including, where appropriate, accommodation for older people, students, custom and self-build and travelling communities.

**61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons**

Whilst we support the principle of bringing forward a greater number of smaller sites, the practicalities of doing so need to be more clearly recognised. Smaller proposals in rural areas are often greeted with a great deal of local opposition and the greater number of such sites which are allocated, the more contentious and complex a local plan examination is likely to become. This will be further exacerbated by the proposal to require an additional 10% of the overall housing requirement to be provided on sites of between 1 and 2.5 hectares.

A better alternative would be to require local authorities to make provision for smaller sites but rather than specifying a national 10% target, to instead require each local authority to set out and evidence what they consider to be the most appropriate target for their area. In some instances, this may be above 10% and conversely, elsewhere, may be less.

**62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?**

No.

**63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

N/a

**64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

**a) Please provide your reasons, particularly if you disagree.**

If development viability is properly established at the plan-making stage, it should not be necessary to apply a more flexible approach to the size of market homes. Whilst achieving policy compliant levels of affordable housing (including social rent and other tenures) is essential, this should not be at the expense of market homes. Inevitably such an approach is likely to put a squeeze on such provision and either lead to few numbers of larger homes or larger numbers of smaller homes. Either way, the outcome is not likely to be balanced or properly reflect local needs.

**65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?**

All qualifying affordable housing schemes (typically 11+ units) should be required to provide half (50%) of any affordable housing requirement in the form of social rented accommodation. Establishing a national requirement such as this would be helpful as it would then feed into whole plan viability assessments to understand the potential viability impact on other developer requirements.

**66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?**

Yes, changes to planning policy are likely needed to better support affordable temporary accommodation such as stepping stone housing. Current policy, including the National Planning Policy Framework, does not clearly distinguish transitional housing from permanent homes, which can limit flexibility and viability.

**a) If so, what changes would be beneficial?**

Beneficial changes would include formally recognising stepping stone housing as a distinct typology and allowing proportionate flexibility around the Nationally Described Space Standard where accommodation is genuinely time-limited and well managed. This flexibility should be tied to clear safeguards to ensure safety, quality and appropriate move-on arrangements. Such reforms would help deliver affordable temporary homes without lowering standards overall.

**67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

**a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.**

West Oxfordshire District Council fundamentally opposes this proposed change. In short, there is no reason at all as to why medium-scale sites should not deliver affordable housing on site and applicants should not have broad discretion to meet social and affordable housing requirements through cash payments in lieu of on-site delivery.

On-site provision is significantly more effective at delivering genuinely mixed and balanced communities, which is a core objective of the National Planning Policy Framework. Allowing routine commuted sums would undermine this objective by separating affordable homes from market housing and concentrating provision elsewhere.

Commutated sums are frequently less effective in practice. They can be delayed, reduced through viability negotiations, or absorbed into wider funding gaps, resulting in fewer homes delivered overall and slower delivery. There is no compelling justification for exempting medium-scale sites from providing on-site affordable housing; such schemes are typically large enough to accommodate an appropriate tenure mix without prejudicing viability.

Allowing cash in lieu also risks creating mono-tenure developments and weakening social integration at precisely the scale where mixed communities can and should be achieved.

If any flexibility were to be considered, it should be strictly limited to genuinely exceptional circumstances.

**b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer**

Yes – in certain circumstances, on-site provision will not be possible or preferable but that is already reflected in the text of the current Framework which should either be retained or only modified slightly. Such circumstances are already recognised in most local plans which apply a type of sequential approach seeking on-site provision in the first instance, followed by consideration of changes to quantum or tenure mix and then consideration of commuted sums for off-site provision as a last resort.

This principle must be reflected at the national level.

**68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).**

A policy allowing routine cash payments in lieu of on-site affordable housing on medium sites would carry significant risks, with limited and uncertain benefits.

In terms of SME housing delivery, there may be a perceived short-term benefit if commuted sums simplify scheme design and reduce negotiation complexity. However, medium sites are generally capable of accommodating policy-compliant affordable housing, and there is little clear evidence that on-site provision is a primary barrier to SME participation. A blanket flexibility risks overstating viability constraints and could incentivise land transactions at higher values based on reduced on-site obligations.

On overall housing delivery and build-out rates, the impact is uncertain and could be negative. On-site affordable housing often supports delivery by forward-funding or de-risking schemes through early acquisition by Registered Providers. Removing that route may slow build-out, particularly where SMEs rely on phased disposals to support cash flow. Cash contributions can also delay affordable delivery if local authorities must subsequently assemble sites and funding to bring forward separate schemes.

The most significant risk relates to overall social and affordable housing delivery. Commuted sums frequently result in fewer homes being delivered, due to viability reductions, funding gaps, or delivery lag. There is also a clear risk of greater spatial segregation, undermining the objective of mixed and balanced communities embedded in the National Planning Policy Framework. This is particularly problematic on medium sites, which are well suited to integrating a meaningful but proportionate affordable housing component.

Land values are also likely to adjust upward if developers anticipate cash-in-lieu flexibility. This risks embedding reduced affordable delivery into residual land values, making it harder to secure on-site provision in future and weakening the effectiveness of policy.

For Registered Providers, including SME providers, the policy could reduce access to small and medium-sized on-site opportunities that are often more manageable and geographically dispersed. Larger, off-site schemes funded through commuted sums may favour bigger providers and reduce market diversity. It may also increase uncertainty around pipeline and timing.

Overall, while there may be limited administrative benefits for some applicants, the risks to affordable housing numbers, tenure integration, land value inflation and delivery certainty are substantial. The policy could weaken rather than strengthen both overall housing outcomes and the sustainability of the affordable housing sector.

**69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.**

If commuted sums are to play a greater role, clearer national guidance would be needed on timeframes, pooling, and flexibility of use, alongside stronger alignment between planning, housing and funding regimes. Greater certainty over grant funding, streamlined procurement rules, and the ability to combine commuted sums with other subsidy without penalty would also help accelerate delivery.

However, it is important to stress that delays in spending commuted sums are rarely the result of inaction by Local Planning Authorities. In most cases, barriers relate to land availability, viability constraints, funding gaps, Registered Provider capacity, and wider market conditions. Without addressing those structural constraints, simply increasing the volume of commuted sums will not in itself result in faster or more effective affordable housing delivery.

**70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?**

Yes.

**a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.**

Further guidance would be helpful, particularly to ensure consistency and to avoid systematic under-valuation of commuted sums.

Any guidance should make clear that cash contributions in lieu must represent the full policy-compliant value of on-site provision, not a discounted or negotiated alternative. A clear principle should be that the contribution is equivalent to the value of providing the required affordable housing on-site, with no financial advantage arising from off-site delivery.

In practice, this could be framed through a transparent viability-based comparison of the Gross Development Value of the proposed market scheme and the Gross Development Value of a policy-compliant scheme including on-site affordable housing, ensuring that the resulting sum captures the true cost of foregone on-site provision. The guidance should also emphasise transparency, standardised inputs where possible, and safeguards against double-counting or circular viability arguments. Without such clarity, there is a significant risk that commuted sums will deliver fewer affordable homes in practice than on-site provision would have achieved.

**71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Partly disagree.

**a) Please provide your reasons, particularly if you disagree.**

While there may be limited circumstances where off-site delivery could optimise outcomes, the starting point should remain on-site provision. Mixed and balanced communities are a core objective of the National Planning Policy Framework, and routine reliance on off-site delivery risks undermining tenure integration and reinforcing spatial segregation.

In practice, claims that off-site provision will improve quality or quantity can be difficult to verify and may be used to justify reducing on-site obligations. There is also a delivery risk with off-site schemes often depending on separate land assembly, funding alignment and Registered Provider capacity, which can introduce delay or reduce overall numbers. On-site provision, by contrast, is directly tied to the parent scheme and is more certain to come forward in parallel.

If off-site delivery is to be enabled, it should be strictly controlled and permitted only where it demonstrably delivers equal or greater affordable housing outcomes in both quantitative and qualitative terms, with clear safeguards around timing, tenure mix and location. It should not become a generalised alternative to policy-compliant on-site provision.

**72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The broad thrust of Policy HO9 is supported, particularly the emphasis on accessibility, proximity to services, and appropriate management arrangements. Requiring housing for older people to be located where residents can easily and safely access frequently used services by walking, wheeling or public transport is consistent with good placemaking principles and with the objectives of the National Planning Policy Framework. Similarly, the requirement for delivery to M4(2) or M4(3) standards is appropriate to ensure homes are genuinely fit for an ageing population.

However, there is a risk that the locational criteria could be applied too rigidly, particularly in smaller towns, rural areas or edge-of-settlement sites where service provision is more limited but need for specialist accommodation is still acute. An overly restrictive interpretation could unintentionally constrain delivery and reduce choice, especially where schemes may themselves support local services or include on-site facilities.

For specialist community-based and student accommodation, the focus on management plans and access to services is sensible and proportionate. Overall, the policy is sound in principle, but implementation should allow for flexibility based on local context, viability and demonstrated need, rather than applying uniform spatial tests that could inhibit delivery in certain areas.

**73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The proposed criteria are broadly appropriate. Ensuring that community-based specialist accommodation is located where residents can safely and easily access frequently used services, and requiring a clear management plan to demonstrate how a safe and secure environment will be maintained, are sensible safeguards.

However, care is needed to avoid overly rigid locational expectations. Many forms of community-based specialist accommodation serve vulnerable groups whose needs, support networks and funding arrangements may not always align neatly with highly central or service-rich locations. In some cases, quieter or edge-of-centre locations may be more appropriate for wellbeing, safeguarding or operational reasons.

The glossary changes should therefore provide clarity without narrowing the definition in a way that unintentionally excludes legitimate forms of provision.

**74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The criteria for purpose-built student accommodation and large-scale shared living are broadly sensible. Requiring locations with easy and safe access to frequently used services, relevant education facilities, and public transport supports sustainable travel and aligns with the overall objectives of the Framework. Similarly, ensuring adequate communal facilities and management plans helps maintain quality and safety, which is important given the high turnover and intensity of use in these developments.

However, a rigid application of these criteria could unnecessarily restrict delivery in areas with high student or shared-living demand, especially where peripheral sites are well-connected by public transport or on-site amenities. Glossary changes should clarify definitions but not create barriers that prevent viable schemes in locations that can function effectively for residents. Flexibility is needed to balance accessibility with site availability and local housing pressures, rather than applying a strict locational test.

**75) Do you agree the proposals provide adequate additional support for rural exception sites?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, including what other changes may be needed to increase their uptake?**

The proposals provide a useful framework to support rural exception sites, particularly by emphasising local need, restricting site size, and prioritising affordable housing. Requirements for sites to be well-related to existing settlements and for development to respond to up-to-date local housing needs are appropriate safeguards that align with the objectives of the National Planning Policy Framework.

However, uptake of rural exception sites remains constrained by practical barriers, including limited availability of suitable land, uncertainty over funding for affordable units, and the administrative burden of demonstrating local need. Additional support could include greater flexibility on site thresholds in smaller settlements, stronger alignment with funding mechanisms to reduce reliance on market cross-subsidy, and clearer guidance on land release from public or community ownership. These measures would help unlock more rural exception schemes and ensure they can deliver the intended affordable housing outcomes.

**76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

Removing First Homes exception sites as a discrete category is sensible. First Homes are already a form of affordable housing, and retaining a separate exception site route creates unnecessary duplication and complexity within the planning system. Consolidating all affordable housing exception sites under a single framework would simplify policy, reduce confusion for applicants and local authorities, and provide greater flexibility to respond to local housing needs, without undermining the delivery of First Homes.

**77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?**

Setting a benchmark land value for rural exception sites could help bring forward more affordable homes by providing greater certainty for developers and landowners, reducing negotiation disputes, and limiting land price inflation that can block delivery. A clearly defined benchmark also supports consistent decision-making across local authorities and encourages landowners to release suitable sites for affordable housing.

Of the options suggested, using a benchmark of £10,000 per plot appears most practical, as it provides a simple, transparent starting point while remaining broadly reflective of rural land markets. Existing use value could be applied where exceptional circumstances make the standard benchmark unrealistic.

**78) Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**79) Please provide your reasons, particularly if you disagree.**

The proposals in HO12 capture many key elements of the existing Planning Policy for Traveller Sites (PPTS), particularly the emphasis on settled bases, access to services, health and wellbeing, and avoiding social isolation. Including requirements to consider local need, personal circumstances, and fair treatment for all travellers (not just those with local connections) is also welcome and aligns with the principle of equitable planning decisions.

However, there is a risk that some criteria could be interpreted too rigidly, particularly around site design and integration, which could inadvertently constrain delivery of suitable sites. For example, ensuring sites are not “isolated from the rest of the community” is important in principle, but overly prescriptive guidance could make it difficult to locate sites in areas where land availability is limited. Similarly, while involvement of existing residents in relocations is sensible, practical guidance may be needed to ensure this is feasible without causing delays.

**80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

HO13 provides a useful framework to encourage timely delivery of homes by considering housing tenure mix, local market conditions, and development phasing. Measures such as shorter-than-default commencement periods and flexible frameworks for large-scale, phased developments are positive steps to reduce unnecessary delays while accommodating changes in viability, design, and housing need.

However, the policy alone is unlikely to guarantee faster build-out. Many delays stem from structural constraints, such as infrastructure requirements, utility connections, and site assembly.

A further significant factor is the deliberate practices of some developers, including landbanking or holding permissions to influence local housing supply, which can prevent local authorities from maintaining a five-year housing land supply and slow the delivery of homes even on ready-to-develop sites.

To be fully effective, HO13 should be complemented by stronger measures to discourage speculative landholding and ensure permissions are actively translated into homes on the ground.

**81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Encouraging a flexible consenting framework for large-scale residential and mixed-use development is sensible, as it allows schemes to adapt to changing housing need, viability, and design considerations over time. Flexibility can, in some instances, help unlock complex sites, support phased delivery, and ensure infrastructure and affordable housing requirements remain achievable throughout the development lifecycle.

However, flexibility alone may not be sufficient to fully realise the opportunities of large-scale development. Challenges such as land assembly, infrastructure delivery, utility connections, and developer strategies including slow build-out, can still delay progress and limit the benefits of these sites.

To maximise large-scale opportunities, the policy should be paired with measures that incentivise timely development, hold developers to account, and ensure that flexible frameworks do not become a route for indefinite delays or under-delivery of affordable housing.

**82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?** *Yes, no*

Yes.

**a) Please provide your reasons.**

Delivering very large or “super strategic” sites, including new towns, requires more specific approaches than standard planning mechanisms can provide. These developments involve complex land assembly, long phasing periods, major infrastructure requirements, and multiple stakeholders, which can create significant risks for timely delivery if handled through conventional planning alone.

Effective delivery mechanisms such as development corporations, local development orders, or tailored masterplanning frameworks can provide the governance, coordination, and certainty needed to bring these sites forward. They allow for streamlined decision-making, early infrastructure provision, and secure funding, while maintaining oversight of design quality, affordable housing delivery, and community integration.

Without such mechanisms, the scale and complexity of these sites risk slow build-out, piecemeal development, and under-delivery of housing and infrastructure.

Specific definitions and approaches would therefore support clarity, accountability, and the successful delivery of very large strategic developments.

**83) Do you agree with the proposed changes to the Housing Delivery Test rule book?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Updating the Housing Delivery Test (HDT) rule book to use the most recently adopted plan for calculating housing requirements provides greater clarity and better aligns the test with a planned approach. Removing the 'lower of' rule simplifies the system and ensures that local authorities are measured against a clear, up-to-date target, which can support accountability and strategic planning.

However, there are potential risks. Authorities could face pressure to meet ambitious adopted targets that may not reflect current market conditions, infrastructure constraints, or viability challenges.

While aligning the HDT with the most recent plan makes sense in principle, additional guidance or flexibility may be needed to account for exceptional local circumstances, phased delivery, or sites where strategic planning assumptions have changed since adoption. Without this, there is a risk that the HDT could penalise councils despite genuine efforts to deliver housing, particularly on complex or large-scale sites

**84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy E1 appropriately emphasises the need for flexibility in planning to support long-term economic growth. By recognising the importance of changing commercial property requirements and avoiding overly prescriptive site use designations, the policy allows development plans to respond to evolving market demands, technological innovation, and sector-specific needs. Explicit reference to Industrial Strategy Zones, AI Growth Zones, and wider national strategies will help to ensure that local plans align with government priorities, while also supporting investment, job creation, and infrastructure delivery.

However, there is a need for caution. If development plans are too unprescriptive, this can create a degree of uncertainty for investors and developers. Striking the right balance between flexibility and certainty is essential to provide confidence for businesses while still enabling local authorities to respond to changing economic circumstances.

**85) Do you agree with the approach to meeting the need for business land and premises in policy E2?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy E2 provides a clear framework to support business growth by giving substantial weight to the economic benefits of commercial development and recognising sector-specific needs, such as freight, logistics, and agricultural modernisation.

Emphasising market signals, locational requirements, and infrastructure capacity helps ensure that development proposals address genuine unmet need while aligning with local and national economic strategies, including Industrial Strategy Zones and AI Growth Zones.

However, there is a risk that the policy could be interpreted too broadly in favour of economic benefits, potentially overriding other planning considerations such as environmental protection, amenity, or landscape impacts. While supporting business development is important, careful implementation is needed to ensure that granting weight to economic benefits does not create uncertainty or undermine the balance between growth, sustainability, and local planning priorities.

**86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy E3 provides a clear and useful framework for supporting freight and logistics development, recognising the sector's unique locational and operational requirements. Emphasising access to transport networks, efficient movement of goods, and appropriately designed facilities is essential to support economic growth and supply chain resilience. Co-location and intensification of facilities, along with adequate parking provision, are sensible measures to optimise land use and operational efficiency.

However, the policy's wording on impacts to local residents and neighbouring uses could be interpreted as implying that some negative effects are inherently acceptable. While mitigation is important, development decisions should prioritise protecting amenity and local quality of life. A more nuanced approach is needed to ensure that proposals balance operational needs with the rights and wellbeing of nearby communities, rather than treating potential impacts as automatically acceptable.

**87) Do you agree with the approach to rural business development in policy E4?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy E4 provides a sensible framework to support the sustainable growth of rural businesses, including agricultural diversification, rural tourism, and facilities that enhance farm viability. Emphasising the conversion of existing buildings, well-designed new development, and the retention of local services aligns with the wider objectives of sustainable rural growth.

However, there are some potential concerns. The policy acknowledges that rural business development may need to be located outside settlements and in areas with limited public transport, but the guidance on siting and design could benefit from stronger emphasis on minimising environmental impacts and protecting local amenity. While using previously developed land where possible is positive, rural sites are often constrained, and there may be tension between operational needs and landscape or ecological protection.

**88) Do you agree with the proposed changes to policy for planning for town centres?**  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council considers that Policy TC1 provides a clear and comprehensive framework to support the vitality and viability of town centres. Emphasising design guides, codes, and masterplans is also positive, as these tools can help create distinctive, attractive, and well-functioning centres.

However, some caution is needed. Removing the explicit ten-year look-ahead may reduce certainty for developers and investors, particularly for larger schemes requiring long-term planning and infrastructure coordination.

**89) Do you agree with the approach to development in town centres in policy TC2?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) If not, please explain how you would achieve this aim differently?**

Policy TC2 provides a clear and positive approach to supporting town centre vitality and viability. Giving substantial weight to proposals that diversify uses, enable residential development, and protect or improve access to local shops aligns with the objectives of sustainable, inclusive, and well-functioning centres.

The latter point is particularly supported as the issue of access to local shops and services is a key consideration in rural areas such as West Oxfordshire.

By explicitly linking development benefits to both economic activity and community access, we consider that this policy will help to encourage investment while maintaining the social and functional role of town centres.

**90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?**

West Oxfordshire District Council considers that the introduction of Class E has increased flexibility in the use of commercial premises, but it has also reduced the influence of the sequential test in guiding development towards town centres. This has meant that some retail and service uses can now change use outside of designated centres without planning permission, thereby undermining the vitality and viability of smaller town and village centres.

**91) Do you believe the sequential test in policy TC3 should be retained? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The Council supports the retention of the sequential test in TC3, as it remains a useful tool to steer new development for main town centre uses to locations that strengthen existing centres. At the same time, the flexibility introduced in considering format, scale, and the potential to accommodate development across multiple sites is welcomed, as it reflects the practical realities of West Oxfordshire's town centres, where sites are often constrained or fragmented.

West Oxfordshire District Council therefore believes that TC3 strikes an appropriate balance between ensuring town centre first principles are maintained and allowing sufficient flexibility to reflect local circumstances. However, the Council notes that ongoing monitoring will be important to ensure that the influence of Class E does not inadvertently encourage out-of-centre development at the expense of the district's town centres.

**92) Do you agree with the approach to town centre impact assessments in policy TC4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council considers that Policy TC4 provides a reasonable and proportionate framework for assessing the impact of out-of-centre retail and leisure development. The approach of requiring impact assessments for proposals above a defined threshold aligns with the need to protect the vitality and viability of town centres such as Witney, Chipping Norton, and Carterton, while providing flexibility for smaller-scale development.

The Council welcomes the clarification that a failure to meet the impact test is not an automatic reason to refuse permission, as this allows for a balanced assessment of economic, social, and environmental factors.

However, it is important to ensure that the weight given to town centre impacts remains sufficient to protect local centres from disproportionate out-of-centre development, particularly in the case of smaller town centres and dispersed rural communities.

**93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council considers that Policies CO1 and CO2 provide clearer and stronger support for the rollout of 5G and gigabit-capable broadband infrastructure. Emphasising the use of existing sites before proposing new infrastructure will help to minimise visual impacts and supports efficient network expansion, while also encouraging sustainable deployment practices. The policies' clarity on design, siting, and compliance with international guidelines on non-ionising radiation will also help to provide certainty for both applicants and local authorities.

The consolidation of guidance on supporting information in CO2 is also welcome, as it sets out reasonable expectations without introducing new burdens, ensuring that applications are properly evidenced while avoiding unnecessary procedural delays.

**94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

We consider that the requirements to minimise visual impact and to prioritise the use of existing structures are practical and will help to ensure sustainable and sensitive deployment of telecommunications infrastructure. Encouraging applicants to reuse masts, buildings, or other structures aligns with good design practice and is likely to help reduce unnecessary landscape harm.

However, in practice there can be constraints that limit how feasible this is, particularly in rural areas such as West Oxfordshire where suitable existing structures may be sparse, and network coverage requirements for 5G and gigabit broadband are demanding. Strict adherence to these requirements could, in some cases, delay delivery or increase costs if alternative sites must be sought. Flexibility is therefore important to balance the objectives of minimising visual impact with the operational need to provide effective and reliable coverage.

**95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council considers that the supporting information requirements in policy CO2 are proportionate and sufficient. They clearly set out what evidence is needed, such

as demonstrating reuse of existing structures and compliance with international guidelines, without imposing additional or unnecessary procedural burdens on applicants.

**96) Do you agree with the approach to planning for energy and water infrastructure in policy W1?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?**

Policy W1 provides an appropriate and proactive framework for planning for energy and water infrastructure. Early engagement between plan-making authorities, utility providers, regulators, and network operators is essential to identify current and future constraints, particularly given the district's growth ambitions.

This is a topical and important issue for West Oxfordshire, where wastewater capacity and, to a lesser extent, water supply are critical considerations in determining the scale and timing of new development. Ensuring that development plans reflect infrastructure needs, support upgrades, and avoid constraining network operation is essential to prevent delays or adverse impacts on new and existing communities.

**97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy W2 provides a clear and positive update to planning for renewable and low-carbon energy and electricity network infrastructure. Explicitly including standalone electricity network infrastructure recognises the growing importance of grid capacity in supporting both new development and low-carbon energy projects.

The requirement for development plans to identify suitable areas for renewable and low-carbon energy, including opportunities for re-powering and life extensions, is practical and helps provide certainty for developers and investors.

In West Oxfordshire, where sustainable energy provision and resilience of the electricity network are increasingly relevant to supporting growth and climate objectives, this approach ensures that new developments can be efficiently connected to low-carbon energy sources.

The emphasis on decentralised networks and co-location of energy supply and demand is also welcome, as it promotes efficiency, reduces carbon emissions, and aligns with wider sustainability goals.

**98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.**

West Oxfordshire District Council welcomes Policy W3 as a largely positive and supportive framework for renewable and low-carbon energy development and electricity network infrastructure. Giving substantial weight to benefits for energy security, economic development, net zero, and re-powering existing sites is sensible, and recognising the contribution of small-scale and community-led projects reflects the importance of local initiatives in achieving climate objectives. The emphasis on decommissioning and site restoration for time-limited developments is also appropriate and provides clarity for applicants and decision-makers.

However, the Council has major concerns regarding bullet point 2, which states that applicants should not be required to demonstrate the need for renewable or low-carbon energy development or electricity network infrastructure. While encouraging development in general is important, entirely removing the need to demonstrate need could lead to poorly planned proposals coming forward in locations where infrastructure capacity, environmental constraints, or local sensitivities make development unsuitable. This could create uncertainty for local planning authorities and risk undermining careful strategic planning for energy infrastructure in West Oxfordshire.

In addition, the policy should specifically recognise and encourage the environmental benefits of renewable and water-related developments. While economic and societal benefits are highlighted, there is no explicit reference to nature recovery. Developments should be encouraged to integrate enhancements for biodiversity, particularly through the implementation of opportunities identified within Local Nature Recovery Strategies (LNRS). This could include habitat creation, restoration, or ecological improvements alongside renewable infrastructure, ensuring that energy projects deliver measurable contributions to both climate objectives and the local environment.

**99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council welcomes Policy W4 as a clear and positive framework to support water supply, drainage, and wastewater infrastructure. Giving substantial weight to proposals that increase capacity, improve water quality, and reduce water-borne pollution is appropriate, particularly in a district where wastewater capacity is a key constraint on delivering new housing and supporting economic growth.

The Council considers it especially important that additional weight is given to proposals which facilitate the early delivery of new homes, helping to ensure that planned growth in West Oxfordshire can proceed without unnecessary delays.

In addition, there is a significant opportunity for water-related developments to make positive contributions towards nature recovery. By integrating habitat creation, restoration, and other ecological enhancements, particularly through the implementation of opportunities identified in Local Nature Recovery Strategies (LNRS), such developments can deliver multiple benefits.

**100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports the proposed prohibition on identifying new coal sites and the removal of coal from the list of minerals of national and local importance. This approach aligns with national priorities to reduce reliance on fossil fuels, support the green energy transition, and achieve net zero objectives. Continuing to plan for coal would be inconsistent with the government's licensing reforms and wider climate commitments.

The Council welcomes the emphasis on critical and growth minerals, which are increasingly important for supporting renewable energy, low-carbon technologies, national security, and the development of key industrial sectors.

**101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports the approach in Policy M1 regarding oil and gas, which maintains planning for exploration, appraisal, and production within licensed areas while preventing the identification of new sites or extensions outside these areas. This approach provides clarity and aligns with the government's position not to issue new onshore oil and gas licenses, supporting the transition away from fossil fuels.

**102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports the proposed addition of critical and growth minerals to the glossary definition of "minerals of national and local importance." Recognising

these minerals reflects their increasing economic and strategic significance, particularly for supporting the green energy transition, net zero objectives, national security, and key sectors identified in the Industrial Strategy.

Including these minerals in the glossary ensures consistency in interpretation across development plans and reinforces the importance of supporting sustainable domestic supply where feasible, while balancing environmental protection and local community interests.

**103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non-minerals development?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports the intention of Policy M2 to prevent the sterilisation of mineral resources, recognising that minerals are finite and can only be worked where they occur. The requirement for prior extraction on sites allocated for non-mineral development, where practical and environmentally feasible, provides much-needed clarity and stronger protection.

However, the Council considers that there is a need for careful flexibility to ensure that requiring prior extraction does not unnecessarily delay or render non-mineral development unviable, particularly for smaller or environmentally sensitive sites.

A rigid application of prior extraction could create tensions with housing and infrastructure delivery. The policy strikes a reasonable balance, but local authorities should retain the ability to assess feasibility and environmental impact on a site-specific basis.

**104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports Policy M3's explicit recognition of critical and growth minerals and the substantial weight to be given to their exploration, extraction, and processing. The policy reflects the growing strategic importance of these minerals in supporting the green energy transition, achieving net zero targets, safeguarding national security, and underpinning the growth of key sectors outlined in the Industrial Strategy.

**105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**106) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council supports the exclusion of onshore oil and gas extraction from Policy M3. This approach aligns with the national commitment to transition away from fossil fuels and reduce greenhouse gas emissions, supporting net zero objectives.

Including onshore oil and gas in the same category as critical and growth minerals would be inconsistent with broader climate and energy policy and could undermine the focus on sustainable mineral resources. Excluding it provides clarity for local planning authorities and ensures that planning decisions prioritise low-carbon and strategically important minerals over fossil fuel extraction.

**107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**108) Please provide your reasons, particularly if you disagree.**

It appropriately addresses environmental, heritage, health and aviation safety impacts, including cumulative effects, and recognises the need to control noise, dust and vibration while acknowledging the operational realities of mineral extraction. The requirement for restoration and aftercare to high environmental standards is also welcome.

However, some elements would benefit from greater clarity. The phrase “unacceptable adverse impact” is open to interpretation and could lead to inconsistent decision-making. The restriction of financial guarantees to exceptional circumstances may reduce certainty that sites will be fully restored, particularly in more complex cases. Stronger wording on cumulative impact assessment and clearer assurance around restoration would improve confidence in the policy’s effectiveness.

**109) Do you agree with approach to coal, oil and gas in policy M5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy M5 introduces a clearer and more restrictive framework for coal extraction and retains a firm position against new or extended peat extraction, which is supported given the environmental and climate implications. The stronger approach to coal aligns with the direction of travel set by the Department for Energy Security and Net Zero and provides greater policy clarity than the previous wording.

However, allowing oil and gas exploration and production within licensed areas maintains a pathway for new fossil fuel development. While the public safety and methane capture exceptions are understandable, the policy could more clearly articulate how decision-makers should weigh climate impacts and carbon budgets when considering proposals.

**110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No**

No

**111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.**

Coal extraction should remain limited to the exceptional circumstances already set out in Policy M5, namely public safety and methane capture. Expanding the range of exceptions would risk undermining the policy's intent to significantly restrict new coal development and align with wider climate and decarbonisation objectives supported by the Department for Energy Security and Net Zero.

**112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The policy could provide greater clarity on how decision-makers should balance safeguarding against other development needs where conflicts arise. The wording "constrain likely or foreseeable future use" may be open to interpretation and could benefit from clearer guidance to ensure consistent application.

**113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy M6 broadly clarifies the role of Minerals Consultation Areas by requiring consultation with the mineral planning authority and consideration of the local minerals plan before determining applications.

However, the policy could offer clearer guidance on how safeguarding considerations should be balanced against competing development priorities.

Greater clarity on the relationship between Minerals Consultation Areas and Mineral Safeguarding Areas would also strengthen the policy and assist decision-makers.

**114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

### **115) If not, what further guidance is needed?**

Policy L1 provides generally clear and comprehensive guidance on promoting the efficient use of land. It strengthens the emphasis on optimising previously developed land, allocating a range of site sizes, and securing multiple benefits through mixed-use development. The proactive role for local authorities in identifying and assembling land is also welcome.

However, criterion 1(a)(iv) is framed too weakly. Requiring authorities only to consider whether minimum density standards should be set in other parts of the plan area risks inconsistent and cautious application. To ensure effective land use and plan-led certainty, the policy should require local planning authorities to set minimum densities where appropriate, rather than simply consider doing so. Strengthening this wording would better support delivery, optimise land use, and ensure a more consistent national approach.

The consultation document provides an extensive introduction to this chapter (12), setting out why making the best use of land is a fundamental objective of the planning system, meeting the need for housing and other forms of development, while safeguarding and improving the environment. However, there is currently no clear link to green infrastructure or Local Nature Recovery Strategies (LNRS), apart from L1 1(b)(ii), which refers to enabling significant new habitat creation as an example of environmental net gain. This is the first time environmental net gain is mentioned, yet it is not defined, and it is unclear why it is not referenced elsewhere in the Framework.

Consistency of language and terms is required to ensure that land-use policies align with existing strategies and plans, including LNRS and multi-functional green infrastructure approaches. Integrating green infrastructure and nature recovery into land-use policy would make clear that optimising land is not solely about housing or development density but also about delivering environmental benefits for people and nature. Explicitly referencing LNRS, habitat creation, and environmental net gain would ensure that land-use planning supports biodiversity, climate resilience, and the multifunctional benefits of green infrastructure across communities.

**116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

#### **a) Please provide your reasons, particularly if you disagree.**

While the policy is detailed, some elements may be open to interpretation in practice. Phrases such as “consistent with the overall street scene” and the circumstances in which larger buildings are appropriate could lead to inconsistent application without strong local design codes. In addition, the fixed numerical approach to curtilage development may be overly rigid in some contexts while not sufficiently nuanced in others.

A key concern is that national decision-making policies, including L2 on making effective use of land, do not contain any cross-references to nature, green infrastructure, or wider environmental benefits. Effective land use should not be considered solely in terms of building

footprint or density, but also in the context of delivering multi-functional green infrastructure, habitat creation, and broader environmental gains.

**117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) If not, what typologies should be added or removed and why?**

The policy could be strengthened by explicitly encouraging gentle densification through small-scale subdivisions of larger plots and conversion of larger single-family homes into multiple units where appropriate. Conversely, typologies that could lead to overdevelopment or harm local character, such as excessive rooftop extensions or infill that ignores local context, needs clearer safeguards.

**118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Some elements are too general and may be open to inconsistent interpretation. Terms like “consistent with the overall street scene” and the allowance for larger buildings at corners could result in variable application without stronger national benchmarks. The curtilage footprint and non-developed area thresholds are helpful, but the policy could better acknowledge that flexibility may sometimes be needed to reflect site-specific constraints or opportunities.

**119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions.** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The policy could be clearer on how decision-makers should balance the benefits of distinctive or taller development against potential impacts on local character and neighbouring properties. Without stronger guidance, interpretation could vary between areas, leading to inconsistent application. More explicit criteria or examples would help ensure that departures from the existing street scene are both appropriate and well-integrated.

**120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Whilst we are supportive in principle, the approach may be too rigid in some circumstances, restricting flexibility where site-specific factors could allow for slightly larger or differently configured development without harming character or amenity. The policy could be strengthened by allowing decision-makers to apply discretion based on local context, design quality, and infrastructure capacity.

**121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) If not, please explain how guidance could be clearer?**

Policy L3 provides generally clear guidance on achieving appropriate densities and appropriately emphasises efficient use of land, connectivity, and well-designed, attractive, and healthy places. Setting minimum densities near stations and promoting higher densities in settlements supports sustainable growth and the focus on connectivity and infrastructure will help to direct development to locations where it can be most effective.

However, the expectation that development within settlements should always increase density may not be appropriate in areas that are already densely developed or where further intensification could harm local character, amenity, or infrastructure capacity.

Similarly, applying minimum densities of 40 or 50 dwellings per hectare near stations should not be automatic, as some sites may be inherently sensitive due to conservation, heritage, environmental, or local context considerations. The policy would be clearer and more flexible if it recognised that minimum density targets are a guide rather than a mandatory requirement in all circumstances, allowing decision-makers to account for site-specific constraints and local sensitivities.

**122) Do you agree with the minimum density requirements set out within policy L3?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The minimum density requirements in policy L3 provide useful guidance for directing growth to well-connected locations and making efficient use of land near railway stations.

However, setting 40 or 50 dwellings per hectare as automatic minimums may not be appropriate in all cases. Some sites near stations may be sensitive due to heritage, conservation, environmental constraints, or local amenity considerations. Applying these minimums rigidly could risk overdevelopment or harm the character of existing communities. The policy would be improved by emphasising that these densities are indicative targets only and that decision-

makers should consider site-specific circumstances and local sensitivities when applying them.

**b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence**

Rigid application could reduce flexibility for providing accessible homes for older people, disabled people, or families requiring adaptable layouts, as higher-density schemes prioritise smaller units to meet numerical targets. High-density urban development can sometimes restrict space for community facilities, private amenity areas, and safe access, which are critical for these groups.

**123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of ‘net developable area’ within the NPPF suitable for this policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

DPH is generally an appropriate and widely understood metric for setting minimum density requirements, aligning with established planning practice.

However, DPH alone may not fully capture site-specific considerations, such as the need for larger plots for Gypsies and Travellers, accessible housing, or sensitive development near heritage or environmental assets and there is a concern that over-reliance on this metric could lead to overdevelopment or constrain flexibility.

The definition of “net developable area” is broadly suitable and provides useful clarity by including access, gardens, parking, and incidental open space. It may be too prescriptive in some contexts where local variations in site layout, communal facilities, or other non-standard housing types need to be accommodated. Greater acknowledgement that the net developable area may need to be applied flexibly in certain cases should be considered.

**124) Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons and preferred alternatives.**

Using Travel to Work Areas and service frequency provides an evidence-based method for identifying stations with strong connectivity to employment and services.

However, the parameters may be too rigid in some cases. Limiting well-connected stations to the top 60 Travel to Work Areas may exclude smaller urban or suburban stations that could support higher densities, while service frequency thresholds may not fully reflect the potential for multimodal transport, such as buses, trams, or cycling infrastructure.

Some stations with lower service frequency may still be suitable for densification if supported by other sustainable transport options.

A more flexible approach could combine service frequency with overall accessibility, including walking, cycling, and local public transport links, and allow local planning authorities to identify additional sites where higher densities are appropriate. This would better reflect real-world connectivity and local circumstances while still targeting growth in sustainable locations.

**125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? Yes/No**

Yes.

**a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?**

Minimum density standards could also be applied to urban cores and other high-quality public transport nodes such as major bus hubs or metro/light rail stops.

These locations could be defined using clear, measurable criteria, for example: areas within a defined radius (e.g., 400–800 meters) of key public transport hubs, or within areas designated as town centres, city centres, or identified growth areas in local plans.

Density standards could vary depending on the location type and connectivity. For urban cores with high accessibility, a minimum of 60–80 dwellings per hectare could be appropriate, while for other well-connected transport nodes, 40–50 dwellings per hectare could remain the minimum.

If such an approach were to be taken forward it would be essential to retain flexibility to account for site-specific constraints, heritage sensitivities, and local character.

**126) Should we define a specific range of residential densities for land around stations classified as ‘well-connected’?**

Yes

**127) If so, what should that range be, and which locations should it apply to?**

A specific range of residential densities would provide clearer guidance while allowing flexibility to respond to local circumstances. For land around stations classified as “well-connected,” a range of 50–80 dwellings per hectare could be appropriate.

This range should apply to sites within a reasonable walking distance of the station (typically 400–800 meters) and surrounding areas identified in local plans as suitable for higher-density development.

Flexibility should be maintained to allow local planning authorities to adjust densities based on site-specific constraints and conditions, infrastructure capacity, and wider planning objectives.

**128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**129) Please provide your reasons, particularly if you disagree.**

The guidance is very high-level and may be too general to provide practical clarity in all cases. Terms like “blend effectively” and “acceptable living standards” are open to interpretation, which could lead to inconsistent application between authorities. The policy would be strengthened by including reference to proportion, materials, rooflines, and impact on neighbouring properties, while still leaving scope for local design codes to provide more detailed guidance.

**130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**131) Please provide your reasons, particularly if you disagree.**

The policy could be strengthened by clarifying which tier of plan-making should consider proposals for new Green Belts. It would be helpful to specify that sub-regional or strategic plans, such as Spatial Development Strategies (SDSs), are the appropriate level to assess the need for new Green Belts. This would provide greater consistency, strategic oversight, and alignment with wider growth planning objectives.

**132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy GB2 provides clear and detailed guidance on the respective roles of spatial development strategies and local plans in assessing Green Belt land. It appropriately distinguishes between the strategic assessment undertaken at the SDS level and the more detailed local plan assessment, following the process set out in Annex E.

**133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

**a) Please provide your reasons, particularly if you disagree.**

The proposed approach creates an inappropriate presumption that land near stations should be released from the Green Belt. Proximity to a station alone should not justify altering Green Belt boundaries, as this could lead to excessive development pressure, undermine the fundamental purposes of the Green Belt, and threaten the character and openness of surrounding areas.

Green Belt release should remain strictly limited to cases of fully evidenced exceptional circumstances, with all other reasonable options for meeting development needs considered first. Using station proximity as a primary justification risks circumventing these safeguards and could encourage speculative development in areas that are otherwise strategically important to protect. The policy should be amended to make it clear that station location is only one consideration and does not automatically create a case for boundary alteration.

**134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**135) Please provide your reasons, particularly if you disagree.**

Policy GB5 sets out positive expectations for maximising the benefits of Green Belt land for communities and nature, including improving public access, supporting Local Nature Recovery Strategies (LNRS), and contributing to National Forest and protected landscape objectives. The emphasis on compensatory improvements when land is removed from the Green Belt is also welcome and aligns with principles of sustainable and balanced development.

However, some aspects of the policy may be challenging to deliver consistently through Local Plans. Identifying and implementing compensatory improvements, contributions to nature recovery strategies, and support for multiple environmental objectives can be resource-intensive and complex, particularly for smaller authorities or where multiple stakeholders are involved.

References to nature recovery and LNRS in GB5 (1b) are welcomed. However, the policy should also explicitly include natural flood management as a potential benefit of Green Belt land. Integrating natural flood management measures would deliver multiple advantages, including climate resilience, improved water quality, habitat creation, and enhanced ecosystem services, while contributing to community and environmental objectives. Explicitly recognising these benefits would strengthen the policy and better reflect the multifunctional value of Green Belt land.

**136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policies GB6 and GB7 provide a structured and generally clear framework for assessing development in the Green Belt. The clarification of categories adds clarity and aligns with sustainable development objectives.

However, there are significant concerns with GB7(1h) and the emphasis on development near well-connected stations. While promoting sustainable, transport-oriented development is important, the policy risks creating a presumption in favour of Green Belt release near stations. This could place excessive development pressure on Green Belt land, undermining its fundamental purposes and the openness of surrounding areas.

The tests for non-inappropriate development should make it clear that proximity to a station alone is not sufficient justification and that exceptional circumstances and careful assessment of Green Belt harm remain essential. Strengthening these safeguards would ensure the policies protect Green Belt purposes while enabling sustainable growth.

**137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

**138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.**

We have concerns that this aspect of the policy is overly prescriptive and risks placing undue pressure on Green Belt land. Applying it automatically to housing and mixed-use development that meets the density requirements in chapter 12 could incentivise the release of Green Belt for sites that are not otherwise suitable, potentially undermining Green Belt purposes and local character. Proximity to a station should be one factor among many, rather than a primary justification for development.

**139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Allowing site-specific viability assessments in the three limited circumstances set out in GB8 is generally appropriate, as it provides a degree of flexibility for previously developed land, multi-phase strategic sites, or proposals differing from assumptions in the development plan.

However, there is a risk that even these limited exceptions could be applied too broadly, undermining the delivery of the policy's objectives, particularly the high levels of affordable housing, green space, and infrastructure contributions expected from Green Belt development. The policy could be strengthened by specifying transparent thresholds or reporting requirements for viability assessments to ensure consistency and accountability in how adjustments to contributions are made.

In addition, the Golden Rules should be amended to include explicit reference to supporting nature recovery in 1(c)(ii). Incorporating nature recovery alongside other contributions would ensure that Green Belt development helps deliver wider environmental benefits, in line with the priorities identified in Local Nature Recovery Strategies (LNRS). Including such references would provide clearer guidance for developers and local authorities, helping to align viability assessments with the delivery of both social and environmental objectives.

**140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?**

No.

**141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Strongly agree.

**142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?**

An affordable housing floor is essential to ensure that developments on Green Belt land deliver meaningful community benefits, particularly where viability assessments might otherwise reduce contributions. Without a floor, there is a risk that some sites could come forward with minimal or no affordable housing, undermining the purpose of the Golden Rules.

Whilst a nationally set floor provides clarity, consistency, and a strong safeguard against low contributions, a locally calibrated floor may be more appropriate in areas with higher housing need, different market conditions, or specific policy targets in place. A hybrid approach could potentially work well such as a national minimum (e.g., 10–15% social or affordable housing) to ensure a baseline, with the ability for local plans to set higher floors where justified by local circumstances and housing need.

**143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please explain your answer.**

Testing viability at the plan-making stage using a standardised benchmark land value of 10 times Existing Use Value (EUV) for greenfield Green Belt land could provide useful clarity and consistency for local planning authorities.

However, a fixed national benchmark risks oversimplifying local market conditions. Land values can vary widely and a uniform multiple may not reflect differences in local demand, infrastructure costs, or abnormal development costs.

A more flexible approach could be to use the 10x EUV benchmark as a starting point, but allow local authorities to adjust it based on robust evidence of local land values, infrastructure costs, and market conditions. This would provide the benefits of clarity while retaining sensitivity to local circumstances.

**144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?**

BLVs should be framed as indicative guidance rather than prescriptive, allowing local planning authorities to adjust values based on robust local evidence. This approach would give plan-makers clarity and confidence when testing viability, while avoiding the risk of discouraging landowners from bringing forward sites or undermining plan delivery.

**145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

There is a risk that decoupling grey belt from Footnote 7 protections could create confusion about how these areas interact with other nationally important designations, particularly in sensitive landscapes or where multiple policy layers apply. The policy should make explicit that grey belt designation does not reduce protections already afforded to sites covered by Footnote 7, to ensure decision-makers retain clear guidance and avoid unintended gaps in safeguarding.

**146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy DP1 provides clear guidance on how development plans should embed high-quality design and placemaking outcomes and links design strategy to areas of change, significant site allocations, and broader plan visions, which should help to support consistent decision-making.

However, there are concerns about the resource implications for local planning authorities. Implementing detailed design guides, codes, and masterplans, particularly for multiple significant sites or areas of change, could place a substantial administrative and financial burden on smaller authorities.

Additional support, guidance, or phased implementation is needed to ensure LPAs can realistically deliver these outcomes without compromising other statutory responsibilities or delaying plan preparation.

**147) Do you agree with the approach to design tools set out in policy DP2?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy DP2 provides a clear and structured approach. The inclusion of monitoring and review expectations is welcome, as it encourages adaptive management and ensures design tools remain relevant over time.

However, there are concerns about the resource and capacity implications for local planning authorities. Producing, implementing, and maintaining these design tools, especially with meaningful community engagement and monitoring, requires significant staff time, expertise, and funding.

Some authorities may struggle to meet these expectations without additional support, which could affect the timely delivery of plans and the quality of the outputs.

**148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy DP3 sets out a comprehensive and well-structured framework, and the inclusion of climate change mitigation and adaptation, net zero transition, and green infrastructure is particularly welcome as a positive and necessary update, aligning design expectations with sustainability objectives. The policy also appropriately retains the principle that poorly designed development should be refused and gives weight to innovative proposals.

However, we have some concerns about practical implementation for local planning authorities. The breadth and level of detail expected—particularly in considering climate,

nature, and movement alongside all other design features—could create significant resource pressures for some authorities. Clearer guidance on prioritisation and proportionality, especially for smaller-scale developments, would help ensure the policy is both effective and deliverable.

We welcome the inclusion of a key principle on nature (1d), which requires development proposals to incorporate and/or connect to a network of high-quality, accessible, and multi-functional green infrastructure. However, the policy does not explicitly refer to nature recovery or species and only includes the need to “strengthen habitats” a term that is unclear and the first instance of its use. This could be strengthened by changing the wording to “creating, restoring, and enhancing habitats and features for species,” which would provide a clearer focus on biodiversity outcomes.

The policy rightly includes specific mention of maintaining and enhancing tree cover and incorporating Sustainable Drainage Systems (SUDS) in accordance with policies NE3 and F8. While trees are important, they would have a greater role in nature recovery when considered as part of broader habitat types, including woodlands, orchards, scrub, and hedgerows, especially where these form connected networks linking ponds, species-rich grasslands, and other habitats.

Although connectivity is briefly mentioned, it should be a more fundamental principle. Local Nature Recovery Strategies (LNRS) identify priority networks of habitats and supporting priority species such as house sparrows, toads, and hedgehogs, and the policy should explicitly reflect this.

Finally, the current framing places too much emphasis on the benefits that nature provides to humans. The principle should instead prioritise nature recovery - ensuring that habitats and species features are incorporated within multi-functional green infrastructure - with human benefits recognised as a positive outcome rather than the primary driver.

This approach would better align with climate adaptation and mitigation objectives, ensuring that development contributes meaningfully to ecological resilience while also delivering social and environmental co-benefits.

**149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Partly agree.

**a) If not, what else would help secure better design and placemaking outcomes?**

Policy DP4 provides a strong framework for embedding design quality throughout the planning process. However, there are several potential drawbacks. Beyond resourcing, smaller authorities may lack access to skilled design reviewers or panels with the right expertise, particularly for complex or mixed-use schemes, which could reduce the effectiveness of design review.

The policy could also increase delays in the planning process, as formal design reviews and iterative pre-application engagement add time to decision-making.

There is also a risk of inconsistencies in outcomes if local authorities interpret the policy differently or apply it disproportionately across projects of varying scale.

Furthermore, while the policy expects development quality to be maintained between approval and completion, enforcement mechanisms are not clearly specified.

Clarifying proportionality thresholds, providing guidance on consistent application, and establishing clearer mechanisms to maintain approved design standards would therefore assist.

**150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy TR1 provides a strong foundation for embedding sustainable transport early in plan-making and promoting a vision-led approach.

However, there are some potential drawbacks. Early engagement with multiple stakeholders could slow down plan preparation and may be challenging for smaller authorities with limited resources. Relying heavily on the Connectivity Tool perhaps also risks oversimplifying local transport realities, e.g. in areas with complex travel patterns or where data is incomplete.

The policy could also be clearer on how thresholds for “significant movement” will be applied consistently.

**151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy TR2 is generally sensible in requiring local parking standards while allowing flexibility and promoting sustainable transport. The emphasis on connectivity, optimising development density, and accommodating future mobility needs such as EV charging, cycles, and e-scooters is positive.

However, the policy is currently open to interpretation regarding when maximum car parking standards will be applied. This lack of clarity could lead to inconsistent application across sites, uncertainty for developers, and challenges for local authorities in decision-making. The allowance to consider specific business requirements is helpful but could benefit from clearer guidance on how to balance competing objectives, for example between high-density development and adequate commercial parking.

Furthermore, the policy does not explicitly address how standards should be monitored or reviewed over time to respond to changes in travel patterns or new transport technologies.

**152) Do you agree with the changes proposed in policy TR3 (1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The explicit reference to the Connectivity Tool is positive, as it provides a structured method for assessing how well locations are connected to transport options. Including “wheeling” improves inclusivity and ensures active travel assessments consider a wider range of mobility needs.

However, the policy remains open to interpretation in key areas. For example, the phrase “significant amount of movement in the context of the area” is not fully defined and could lead to inconsistent application across planning authorities. It is also unclear at what threshold or scale of movement the policy should apply, and whether different types of uses, such as residential, commercial, or mixed-use developments, should be treated differently. Similarly, while the Connectivity Tool is useful, reliance on a single tool without guidance on how to weigh its outputs against local circumstances may create uncertainty for developers and decision-makers.

A key omission is the explicit consideration of nature recovery and biodiversity in relation to transport infrastructure. TR3 (1c) refers to the environmental impacts of traffic and transport infrastructure, and securing net environmental gains such as reductions in air pollution, but it does not reference the opportunity to enhance habitats or support wildlife.

New roads, footpaths, and cycleways provide opportunities to create or restore habitats, strengthen wildlife corridors, and improve habitat connectivity. Measures such as sensitive lighting, species-rich planting, and tree planting not only reduce air pollution but also support biodiversity and contribute to Local Nature Recovery Strategies (LNRS).

**153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The policy does not explicitly address how conflicts between competing objectives such as denser development, provision of public transport infrastructure, and safe, low-traffic streets should be managed.

There is also limited guidance on balancing on-site parking requirements with sustainable transport objectives, particularly in areas where local standards are flexible or subject to interpretation.

The wording on accommodating service and emergency vehicles could also create uncertainty about what constitutes “efficient delivery” without compromising placemaking.

**154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

The policy provides clear guidance for approving new, expanded, or upgraded roadside facilities based on evidenced need.

**155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

TR6 is considered to provide a clear and proportionate framework for when transport assessments, statements, and travel plans are required and is therefore welcome.

**156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

TR7 provides a robust framework for supporting the modernisation and diversification of marine ports, airports, and other aviation facilities, but some concern arises with regard to criterion (d).

The current wording could be misinterpreted as setting an absolute environmental standard, whereas it would be clearer and more consistent with planning practice to require proposals to demonstrate that they do not have an unacceptable environmental impact (e.g. in terms of noise, air quality, carbon emissions, transport networks, landscape, visual, and marine effects).

**157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy TR8 provides clear guidance on maintaining and enhancing public rights of way. The emphasis on connectivity will help to support accessibility, active travel, and sustainable transport and is therefore welcome.

However, similar to TR3, there is an important opportunity to integrate nature recovery into these developments. The creation of new footpaths to improve access to green space and the countryside should also be designed to incorporate or make significant contributions towards habitat creation, restoration, and ecological connectivity. Without explicit requirements, such opportunities are often missed unless picked up during the planning application stage or tied to project funding. A more holistic approach should be encouraged, ensuring that climate and nature considerations become an integral part of public rights of way improvements, delivering benefits for both people and wildlife.

**158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy HC1 provides a clear and comprehensive framework, and it is particularly welcome that it requires development plans to set local quantitative standards for outdoor recreational land based on national benchmarks. This approach will help to ensure that development contributes appropriately to health and wellbeing, supports social interaction, and addresses local needs while giving certainty to both developers and communities.

However, the policy does not explicitly reference the health and wellbeing benefits of access to nature. While local green spaces are mentioned, there is no specific reference to the natural environment, including trees, woodlands, species-rich grasslands, or natural play areas. We would advocate for explicit mention of natural green spaces to strengthen the link between physical and mental wellbeing and exposure to biodiverse environments.

These benefits are well-established, and the connection with nature should be given greater emphasis. The design of new urban spaces and green infrastructure should aim to create attractive, accessible, and welcoming environments for both people and wildlife, incorporating principles of biophilic design to maximise health, social, and ecological outcomes.

**159) Do you agree that Local Green Space should be 'close' to the community it serves? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

Local Green Space should be in close proximity to the community it serves to ensure it is accessible, usable, and genuinely contributes to the health, wellbeing, and recreational needs of local residents.

The mention of the “richness of its wildlife” is welcomed with regard to Local Green Spaces. However, terminology should be consistent throughout the Framework, and it would be preferable to reference biodiversity or ecological value explicitly. These spaces should also be linked with Local Nature Recovery Strategies (LNRS) opportunities for nature recovery.

Local Green Spaces provide an important opportunity to create, enhance, or restore habitats and deliver features for priority species such as hedgehogs and common toads, ensuring that development contributes both to community wellbeing and local ecological networks.

**160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

The policies HC3 and HC4 provide a clear and comprehensive framework to ensure that new development is accompanied by the community facilities and public service infrastructure needed.

**161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term ‘fast food outlets’, and the types of uses to which it applies?**

Further clarity would be helpful to ensure consistent application of this policy.

In particular, the term “fast food outlets” would benefit from a clearer definition. At present, it could be interpreted inconsistently, potentially capturing a wide range of premises beyond traditional hot food takeaways (for example cafés, sandwich shops, convenience stores with hot counters, or mixed-use premises).

Clear alignment with use classes, or a glossary definition distinguishing between primary takeaway uses and ancillary hot food sales, would provide greater certainty for applicants and decision-makers.

Similarly, the phrase “reasonable walking distance” would benefit from guidance or indicative parameters (for example, a defined distance range, walking time, or reference to local plan standards), as what is considered reasonable may vary significantly between urban and rural areas.

**162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy HC6 provides a clear and proportionate framework for protecting valued community facilities and public service infrastructure, and the requirement to demonstrate lack of viability or provide equivalent replacement provision is welcome. The inclusion of a marketing requirement for shops and public houses adds transparency and consistency, helping ensure that facilities are not lost prematurely without proper evidence.

This approach reflects established practice in many areas, including West Oxfordshire District Council, which has for many years adopted similar protective policies through successive Local Plans.

However, there are concerns regarding the restriction of the policy to facilities that are the “last of their type” in an area. While this aims to avoid overly restrictive outcomes, it may unintentionally allow the gradual erosion of community infrastructure where more than one facility exists but overall provision is already limited or under pressure. In some locations, the loss of one of only two similar facilities could materially undermine accessibility, choice, community cohesion, or the viability of the remaining service.

Consideration could therefore be given to allowing local planning authorities limited discretion to protect facilities that, while not strictly the last of their type, are demonstrably important to local wellbeing or serve distinct catchments.

**163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

Policy HC7 strengthens protection for open space, sports and recreational land, and the explicit inclusion of formal and informal play space and allotments is welcome.

However, there are concerns regarding the introduction of “and/or” in relation to replacement provision in terms of quantity and quality. While flexibility is understandable, the revised wording could allow a reduction in overall quantity to be justified solely on the basis of qualitative improvements.

This may risk incremental erosion of recreational land, particularly in areas already experiencing pressure from development. Quality improvements, while valuable, may not fully compensate for a reduction in accessible space, especially where population growth is increasing demand.

Greater clarity would be helpful to ensure that flexibility does not lead to a net loss of usable recreational capacity, particularly in quantitative terms.

**164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

No comment.

**165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

We are broadly supportive of the overarching aims of policy P1 and agree that development plans should provide a clear framework.

However, there are concerns regarding the practical implications and resource demands associated with some of the specific requirements, particularly where they expect detailed technical work to be undertaken at plan-making stage. For example, the expectation to identify areas where ground conditions may inhibit or affect development could require extensive and costly site investigations across wide areas, which may not be proportionate or feasible for all authorities, especially where such matters are more appropriately and effectively addressed through site-specific assessment at the planning application stage.

Similarly, identifying and reflecting multiple consultation and safeguarding zones, and assessing land requirements for public safety and security infrastructure, could place significant additional burdens on plan-making teams, with implications for timescales and viability of plan preparation. Greater clarity on proportionality, the level of evidence expected, and how these requirements should align with existing statutory consultation processes would help ensure that the policy is deliverable in practice without placing undue strain on local authority resources.

We welcome the mention of nature-based solutions in P1 (1c) in relation to wider opportunities for reducing air, water, soil, and noise pollution. This could be strengthened by explicitly linking these solutions to Local Nature Recovery Strategies (LNRS), helping to ensure that nature-based approaches deliver multiple benefits, including habitat creation, species support, climate resilience, and broader environmental improvements alongside pollution mitigation.

**166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?**

Additional practical tools and guidance would assist in supporting more consistent and effective decision-making on contaminated land.

In particular, clearer national guidance on the level and type of site investigation information expected at different stages of the planning process would be beneficial. While the requirement

for information prepared by a competent person is supported, further clarity on proportionality, especially for smaller sites, would help avoid unnecessary delay or cost while ensuring risks are properly addressed.

There may also be merit in strengthening access to up-to-date, standardised datasets on historic land uses, landfill sites, mining legacy areas and other potential contamination sources, so that plan-makers and decision-makers can more readily identify areas of risk. Improved digital mapping tools and model planning conditions or obligations relating to remediation and verification could further promote consistency across authorities.

**167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

We are generally supportive of the criteria set out in policy P3 and agree that it provides a comprehensive and structured basis for securing acceptable living conditions and managing different forms of pollution. The explicit reference to daylight and sunlight, air quality (including PM2.5), noise, artificial light, and water quality is welcomed and reflects the importance of protecting both human health and the natural environment.

However, there are concerns regarding how some elements of the policy will operate in practice. The breadth of matters to be assessed, particularly in relation to cumulative impacts and compliance with multiple national targets and plans, may result in significant evidential and viability burdens, especially for smaller sites. Greater clarity on proportionality and the level of technical assessment expected in different circumstances would help ensure the policy is deliverable without unduly constraining development.

In addition, care will be needed to ensure that the requirements do not duplicate or cut across existing environmental permitting and regulatory regimes. We particularly welcome the reference to limiting adverse impacts from artificial light on nature in P3 (2d).

This is an important recognition that light pollution can have significant effects on biodiversity, and it should be reinforced and integrated with broader nature recovery measures, such as the creation and protection of habitats identified in Local Nature Recovery Strategies (LNRS).

**168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

We support the strengthening of policy P4 and welcome the clearer articulation of the agent of change principle. The explicit reference to both current and permitted levels of operation is particularly helpful, as is the expanded list of activities that may be affected, such as emergency services, defence, industrial and waste sites.

However, while the policy is clearer in intent, further guidance may be needed to ensure consistent application in practice. In particular, clarity around what constitutes “unreasonable restrictions” and how decision-makers should balance competing objectives would be beneficial.

There is also a risk that evidential requirements and mitigation expectations could become onerous, particularly for smaller schemes or in complex mixed-use developments.

**169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

We support the intention behind policy P5 and agree that it provides a clearer and more structured basis for ensuring that public safety and security considerations are addressed at the application stage. The explicit reference to consultation zones around hazardous installations, nuclear sites, aerodromes and technical sites is helpful.

However, while the policy is comprehensive, there are practical considerations that warrant attention. The expectation that proposals be informed by the “most up-to-date information” from the police and other agencies may present challenges in terms of access to sensitive information, consistency of advice, and potential delays to decision-making.

Clear guidance on proportionality, particularly for smaller-scale development and how confidential or security-sensitive matters should be handled would be beneficial.

In addition, care will be needed to ensure that requirements do not duplicate existing regulatory and licensing regimes.

**170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

We support the approach in policy P6, which recognises the national importance of land and operations for defence and public protection. Giving substantial weight to proposals that maintain or enhance defence capability or public safety is particularly relevant to West

Oxfordshire, where RAF Brize Norton plays a critical role in national defence and operational readiness.

The policy sensibly requires consideration of the impact of development on existing operational activity, including noise and other potential conflicts. Cross-referencing policy P4 will help to ensure that the agent of change principle is applied, which should in turn, help to protect both the operational capability of facilities like RAF Brize Norton and the amenity of new development in surrounding areas.

**171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

Whilst not of direct relevance to West Oxfordshire, we welcome the strengthened approach in policy F3 to managing coastal change. The clear requirement to designate Coastal Change Management Areas, consider estuaries and tidal rivers, and take a 100-year view aligns well with best practice for long-term risk management. Referring to Shoreline Management Plans, the National Coastal Erosion Risk Map, and the UK Marine Policy Statement will help to provide a robust evidence base for plan-making, and the emphasis on Integrated Coastal Zone Management should ensure that terrestrial and marine planning are effectively aligned.

We also welcome the reference to green infrastructure and natural flood management techniques in policy F2 (1c). However, the policy does not explicitly reference nature-based solutions, which are included elsewhere in the document. Consistency of language and terminology is important to ensure clarity and to emphasise the role of nature-based approaches in flood risk management, habitat creation, and wider environmental benefits. Explicit inclusion of nature-based solutions here would align the policies on flood risk with broader objectives on climate adaptation, biodiversity, and multi-functional green infrastructure.

**172) Do you agree with the proposed clarifications to the sequential test set out in policy F5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

We welcome the clarifications in policy F5 on the sequential test, particularly the recognition that a site-specific flood risk assessment can demonstrate that development would be safe even in areas potentially at risk from surface water flooding. The clarification that the test should be applied based on the anticipated catchment of the development is also helpful for ensuring proportionality.

**173) Do you agree with the proposed approach to the exception test set out in policy F6?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree**

We support the approach in policy F6, particularly the clear linkage between flood zones, the sequential test (policy F5), and the exception test criteria. The inclusion of Annex F tables provides greater clarity on which development types are considered incompatible with flood risk.

We also welcome the clarification that the exception test does not need to be re-applied on allocated sites unless there has been a significant increase in flood risk or a more vulnerable use is proposed.

**174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

We welcome the requirement for Sustainable Drainage Systems (SuDS) to be designed in accordance with the National Standards. This is a key consideration for West Oxfordshire and a recurring issue highlighted by respondents in local planning matters. Ensuring consistency and long-term resilience in managing surface water is essential, particularly given local concerns about flooding and drainage.

The policy's emphasis on multifunctional benefits is particularly welcome, as are the clear expectations for maintenance arrangements and the protection or re-naturalisation of watercourses where feasible.

With regard to consistency of language and terminology, this section refers to biodiversity rather than using broader terms such as nature, nature recovery, wildlife, or habitats. Ideally, the Framework should consistently use the term nature and explicitly link to nature recovery and Local Nature Recovery Strategies (LNRS) wherever relevant. This would ensure that SuDS are not only delivering drainage and flood mitigation benefits but also contributing to wider environmental objectives, including habitat creation, ecological connectivity, and long-term resilience for local wildlife.

Further, F8 (1) refers to facilitating improvements in water quality, biodiversity, and amenity as part of multifunctional benefits associated with the systems employed "wherever possible." We consider this wording too weak. In practice, there are very few scenarios where SuDS could not be designed to provide multifunctional benefits, and in most cases, these should be treated as clear objectives rather than optional enhancements. Allowing "wherever possible" risks giving developers the flexibility to reduce the ecological, water quality, and amenity value of SuDS.

Strengthening this language would ensure that multifunctional benefits - particularly nature recovery, habitat creation, and biodiversity gains - are systematically delivered as an integral part of SuDS design, rather than an optional add-on.

**175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

We fully support the proposed policy to avoid the enclosure of watercourses and to encourage de-culverting and re-naturalisation of river channels. This is particularly important for West Oxfordshire, where flooding and surface water management are recurring issues raised by local communities and stakeholders. Retaining and restoring natural river channels not only reduces flood risk, but also enhances biodiversity, landscape character, and public amenity.

The re-naturalisation of river channels is strongly welcomed. However, the current wording uses the phrase “where possible,” which is too broad and could allow opportunities for restoration to be overlooked.

The emphasis should be on achieving re-naturalisation unless there is clear justification that it is not appropriate or not achievable. This more precise framing would ensure that ecological, flood mitigation, and amenity benefits are delivered consistently, while retaining flexibility only in exceptional circumstances.

**176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

We support the proposed policy F9 on development in Coastal Change Management Areas. The clearer emphasis on avoiding permanent new residential development and aligning proposals with Shoreline Management Plans and the national coastal erosion risk map should help to prevent inappropriate development in areas at risk.

**177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?**

A proportionate approach should take account of both the likelihood and timescale of risk indicated by the National Coastal Erosion Risk Map, so that development decisions are focused on genuinely at-risk areas rather than applying the policy too rigidly.

Prioritise short- to medium-term risk areas where erosion or flooding is likely within the expected lifetime of the development, ensuring that proposals are safe over their planned use.

More vulnerable uses should be assessed against all risk scenarios, whereas less vulnerable or temporary uses may be acceptable in lower-probability risk areas, with mitigation or time-limited permissions.

**178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.**

We strongly support the proposed updates as they will help provide additional clarity and consistency in assessing flood risk across different development types. The inclusion of essential infrastructure such as hydrogen production, carbon capture, data centres, and EV charging stations is particularly welcome, reflecting the growing importance of low-carbon and strategic energy infrastructure.

We also encourage consideration of any additional emerging uses or climate adaptation measures that may require essential infrastructure status in the future, such as battery storage facilities, and water re-use or treatment plants. This would help maintain Annex F as a forward-looking, adaptable framework.

**179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council strongly support Policy N1's approach to safeguarding and enhancing the natural environment. By using Local Nature Recovery Strategies and other evidence, it will help to ensure that development is guided by local ecological priorities while protecting sensitive sites.

The policy helpfully emphasises habitat restoration, ecological networks, and nature-based solutions, alongside clear green infrastructure standards.

We are particularly supportive of the proposal to allow higher biodiversity net gain targets where fully justified and deliverable for specific sites. This encourages meaningful environmental improvements and reflects practical examples such as the recently adopted Salt Cross Area Action Plan which includes a 25% BNG target.

**180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?**

It is important to recognise that seeking biodiversity net gain above 10% should be focused on delivering meaningful benefits for nature recovery. While it may be technically possible for development sites to sell excess biodiversity units to other sites, this would generally only result in habitats that can tolerate high levels of human disturbance, such as areas affected by traffic, dogs, or general urban activity. True off-site provision should instead prioritise the creation or restoration of high-quality habitats in the countryside, where higher distinctiveness and condition can be achieved over the longer term, for example through priority habitats such as lowland meadows. This approach would make a more significant contribution to nature recovery targets, the strategic objectives of Local Nature Recovery Strategies, and the establishment of habitat banks. Sharing BNG provision between development sites could reduce overall contributions to these wider environmental goals. Nevertheless, off-site trading could be reasonable in areas where habitat banks are unavailable or where specific habitat types cannot be provided on-site, although the market for such arrangements is still developing.

**181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The policy provides a strong framework for ensuring development contributes positively to the natural environment, including consideration of landscape character, habitats, and biodiversity.

The explicit inclusion of existing natural features such as hedgerows is welcome, as is the requirement to incorporate features for priority species. However, some aspects could be clarified or broadened to improve effectiveness.

The phrase “wherever possible” in relation to conserving and enhancing existing natural features is quite broad and could reduce the policy’s impact. A clearer approach, such as the wording in the current NPPF paragraph 187, would better ensure valued landscapes, biodiversity sites, and soils are protected and enhanced in line with their statutory or locally identified importance.

The reference to species such as swifts, bats, and hedgehogs is welcomed, but more inclusive wording, for example “including birds, bats, amphibians, reptiles, and mammals such as hedgehogs,” would capture a wider range of priority species.

Similarly, while the requirement for “integrated nest boxes” is supported, describing them solely as “swift bricks” is too narrow. The policy would be strengthened by using a broader term such as “integrated wildlife boxes,” which could include bat boxes, bee bricks, and boxes suitable for other priority birds such as house sparrows and starlings, reflecting multiple species benefits.

The policy currently lacks support for development focused on nature recovery, such as habitat banks, which should be explicitly encouraged to align with Local Nature Recovery Strategies.

Overall, the Council considers the policy a positive step in improving the natural environment, but greater clarity in language, inclusion of more species, and recognition of broader nature recovery initiatives would enhance its effectiveness and deliverability.

**182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, including how policy can be improved to ensure compliance.**

The policy provides a clear framework for considering development within protected landscapes and reflects the statutory duties introduced by the Levelling Up and Regeneration Act 2023. The emphasis on limiting development scale, sensitive siting, and design, alongside substantial weight being given to conserving and enhancing natural beauty, wildlife, and cultural heritage, is welcomed. The inclusion of mitigation measures and consideration of compensation where significant harm cannot be avoided is also supported.

However, the Council considers that further clarity could be provided on what constitutes “exceptional circumstances” for major development. While the policy lists national need, economic impact, and alternatives outside the designated area, more explicit guidance on the threshold for harm would help ensure consistent decision-making.

The policy could also emphasise the importance of considering cumulative impacts and maintaining the special qualities of landscapes, including tranquillity, dark skies, and recreational value, in both designated areas and their settings.

**183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council partly supports Policy N6. The policy provides a clear framework for the treatment of internationally, nationally, and locally recognised sites, and the retention of protections for irreplaceable habitats, including ancient and veteran trees, is welcomed. The inclusion of Environmental Delivery Plans and the nature restoration levy is also supported as a mechanism to secure biodiversity benefits.

However, Policy N6(1)(c) on sites of local importance requires amendment. The current wording allows development to proceed if the benefits clearly outweigh the impact on local sites, without explicitly requiring adequate mitigation or, as a last resort, compensation. This could result in a net loss of biodiversity, particularly where indirect impacts on adjacent sites occur. It is recommended that the policy be revised to ensure mitigation and/or compensation is

required wherever a local site is affected. The “or” between (i) and (ii) should be replaced with “and” to reflect this.

The Council also recommends extending protections for irreplaceable habitats to include ancient meadows and grasslands, alongside ancient and veteran trees, to better support nature recovery and biodiversity objectives.

**184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?**

While Environmental Delivery Plans (EDPs) can provide a useful strategic framework, there are important considerations to ensure they are implemented effectively. Local aspirations for the protection of wildlife, habitats, and ecological features may not always align with EDPs in the future.

EDPs should therefore focus on strategic environmental issues, such as addressing diffuse pollution or providing Habitats Regulations Assessment (HRA) mitigation for recreational pressure and other impacts, rather than prescribing measures for individual species or habitat types.

EDPs may be appropriate for species such as great crested newts, where district licensing approaches already exist. The District Council holds a great crested newt organisational licence as part of the NatureSpace Partnership’s District Licensing Scheme, and the specific design and implementation of this approach is valued.

Any EDP for species must fully incorporate the mitigation hierarchy to ensure local populations are maintained, on-site mitigation is effective, and genetic diversity is preserved.

**185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Strongly agree.

**a) Please provide your reasons.**

West Oxfordshire District Council supports the implementation of the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act. These duties provide clarity and strengthen the statutory framework for decision-making in relation to protected landscapes, ensuring that relevant authorities actively seek to further the purposes of these areas when exercising their functions.

Implementing these duties reinforces the importance of conserving and enhancing natural beauty, wildlife, and cultural heritage, and provides a consistent basis for integrating environmental considerations into planning decisions.

**186) Do you have any evidence as to the impact of implementing the additional regard duties for development?**

At this time, West Oxfordshire District Council does not hold direct evidence regarding the practical impact of implementing the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act on development outcomes. The duties are new, and it is likely that their effects on planning decision-making, development patterns, and environmental protection will only become clear once authorities begin applying them consistently. However, the Council anticipates that clearer statutory obligations should lead to more consistent consideration of protected landscapes in planning decisions.

**187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council partly supports the approach to plan-making for the historic environment set out in Policies HE1–HE3. The policies provide a clear framework for identifying, conserving, and enhancing heritage assets and for integrating heritage considerations into development plans, including World Heritage Sites, conservation areas, and non-designated heritage assets. The emphasis on proportionate heritage assessment, positive strategies for conservation, and alignment with design codes and masterplans is welcomed.

However, there are some practical and strategic concerns. Policy HE1(d) encourages the creation of a local list of non-designated heritage assets important to the community. While this is valuable, many local planning authorities do not have the resources or capacity to compile a comprehensive local list, which may limit the effectiveness of this requirement.

Additionally, although HE1(c) references the contribution of heritage to character and quality through design codes and masterplans, there remains a broader concern within the heritage sector that other chapters of the Framework pay limited regard to heritage, local distinctiveness, and placemaking.

Stronger integration of heritage into wider planning policy would help ensure that conservation positively contributes to quality of life, well-being, and local character, in line with initiatives such as Historic England's Wellbeing and Heritage strategy.

**188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy HE5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council strongly supports Policy HE5. The policy provides a clear and comprehensive framework for assessing the effects of development on heritage assets, recognising the full range of potential impacts from positive enhancement to total loss of significance. The emphasis on proportionate assessment, consultation of the historic environment record, and the use of appropriate expertise is welcomed and reflects best practice in heritage-led planning.

The Council particularly supports the focus on the effect on an asset's significance rather than the scale of development, ensuring that decision-making prioritises heritage value.

The inclusion of specific requirements for assets with archaeological interest, including desk-based assessments and field evaluations where necessary, further strengthens the policy.

**189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The Council welcomes the clarification on decision-making for designated heritage assets and the support for positive impacts, including re-use of underused buildings and energy efficiency improvements. The change from "great weight" to "substantial weight" is supported.

However, the reference made in paragraph three to weighing harm against "public benefits" raises concerns. Without safeguards, proposals such as solar panels, wind turbines, or intrusive insulation could be justified even where harmful.

Any such measures must be subject to robust assessment to ensure compatibility with traditionally built historic buildings and compliance with Historic England guidance, including the Whole Building Approach, to protect the character and fabric of heritage assets.

**190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

The Council welcomes the clearer guidance for World Heritage Sites, conservation areas, and archaeological assets, which strengthens protection and enhancement of heritage in the planning system.

In particular, Policy HE8 provides a robust framework for safeguarding Blenheim Palace World Heritage Site, recognising its Outstanding Universal Value, setting, and cumulative impacts.

While the policy rightly supports proposals that preserve or enhance the setting, it should also be explicit that proposals causing harm to the significance or setting of the World Heritage Site must be refused.

**191) Do you have any other comments on the revisions to the heritage chapter?**

West Oxfordshire District Council welcomes the overall revisions to the heritage chapter, which provide clearer guidance on planning for heritage assets, World Heritage Sites, conservation areas, and archaeological assets. The strengthened focus on positive impacts, significance, and proportionate assessment is supported.

However, the Council notes several areas for improvement. There should be greater emphasis on integrating heritage considerations into wider placemaking and design policies, ensuring that heritage contributes to local character, distinctiveness, and quality of life. The language around local lists of non-designated heritage assets could reflect the practical resource constraints of local authorities. In addition, for World Heritage Sites, the text should explicitly require refusal of proposals that would harm significance or setting, not just support proposals that enhance it.

**192) Do you agree with the transitional arrangements approach to decision-making?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council partly agrees with the proposed transitional arrangements but has in-principle concerns about using the new Framework for decision-making from the date of publication.

Applying the Framework immediately could render even relatively recent local plans effectively out of date very quickly, creating uncertainty for decision-makers, applicants, and communities. An appropriate transitional period should therefore be applied to allow existing plans to continue to guide decisions until such time they can be updated in light of the new Framework.

The transitional arrangements must make it explicitly clear that emerging draft local plans, including those currently under preparation, will be examined against the December 2024 version of the Framework. This would provide clarity for local authorities and stakeholders, ensure consistency in plan-making, and avoid undermining the credibility or robustness of plans submitted under the current system.

**193) Do you have any further thoughts on the policies outlined in this consultation?**

No.

**194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Strongly disagree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council strongly objects to the proposed superseding of the December 2023 Written Ministerial Statement on local energy efficiency standards. This statement has been central in underpinning the Council's approach to Net Zero Carbon development, particularly at Salt Cross Garden Village, as reflected in the recently adopted Area Action Plan.

Rescinding this WMS without any transitional arrangements would effectively render the Area Action Plan out of date and undermine the Council's ability to deliver its net zero carbon ambitions.

The policy provides a locally tailored, evidence-based framework for sustainable development, and removing its statutory weight could delay or compromise key climate commitments. At a minimum, any changes to the WMS should include transitional provisions that preserve the continued relevance and application of the policy for recently adopted plans such as Salt Cross.

**195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please give reasons.**

West Oxfordshire District Council partly agrees that the proposed planning reforms, including the Planning and Infrastructure Act, provide greater flexibility for energy generation projects co-located with data centres. The ability for the Secretary of State to direct projects into or out of the NSIP regime, and for co-located energy generation to be considered alongside data centres, is a positive step that should help reduce delays and improve certainty for developers.

However, there are practical concerns. Even with the redirection power, separate consenting regimes can still create complexity and uncertainty, particularly for large-scale renewable energy projects that support data centres but may not clearly meet NSIP thresholds.

The Council considers that further clarity or transitional guidance is needed to ensure local authorities and developers understand which consenting regime applies and how dependencies between data centres and energy generation will be managed.

**196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? Yes/No**

Yes.

**a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.**

Raising the Planning Act 2008 thresholds for renewable energy generation projects co-located with data centres would be beneficial. Doing so would provide greater certainty for developers, reduce delays caused by navigating separate consenting regimes, and simplify the planning process for projects where the energy infrastructure is integral to the operation of the data centre. This would help to accelerate the delivery of critical AI and digital infrastructure while maintaining proportionate oversight.

The appropriate threshold should be set at a level that reflects the typical energy requirements of medium to large-scale data centres, ensuring that projects essential to operational viability can be consented without unnecessary recourse to NSIP processes.

**197) Do you have any views on how we should define ‘co-located energy infrastructure’? Please provide your reasons.**

Co-located infrastructure should include energy generation facilities that are physically located on, or immediately adjacent to, the data centre site and that are primarily designed to supply electricity directly to the data centre to ensure operational viability.

The definition should also allow for integrated energy storage or distribution systems that form an essential part of the data centre’s energy supply.

**198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? Yes/No**

No.

**a) Please provide your reasons.**

Any increase in the Planning Act 2008 renewable energy generation thresholds should be limited to projects co-located with data centres. The operational and energy dependencies of data centres are unique, and raising thresholds more broadly could unintentionally shift significant renewable energy projects away from local decision-making and scrutiny, reducing local accountability and potentially bypassing important environmental and community considerations.

**199) What benefits or risks do you foresee from making this change? Please provide your reasons.**

If thresholds were applied more broadly, it could reduce local oversight, limit community input, and bypass environmental safeguards. Even for co-located projects, careful guidance is needed to ensure energy generation is proportionate, appropriately sited, and does not cause unintended local impacts.

**200) Would you support the use of growth testing for strategic, multi-phase schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Partly agree.

**a) Please explain your answer.**

West Oxfordshire District Council partly supports growth testing for strategic, multi-phase schemes. It provides upfront clarity on developer contributions, helps manage long-term risks, and supports plan policy compliance. However, growth assumptions may not be realised over long build-out periods, potentially reducing returns below investable thresholds. Any approach should include regular review points and flexibility to adjust contributions to ensure sites remain viable and deliverable throughout their development.

**201) Would you support the optional use of growth testing for regeneration schemes?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please explain your answer.**

West Oxfordshire District Council partly supports the optional use of growth testing for regeneration schemes. Growth testing could help provide early clarity on developer contributions and viability, enabling more effective planning and delivery of complex regeneration projects.

However, as with multi-phase schemes, care is needed to ensure that unrealistic growth assumptions do not undermine scheme viability. Any approach should include clear review mechanisms and safeguards to maintain deliverability.

**202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Partly agree.

**Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development.**

West Oxfordshire District Council partly agrees that providing greater specificity could improve certainty and speed in plan-making and viability assessments. Clearer benchmarks would reduce negotiation and help stakeholders understand expected contributions, particularly on strategic or phased sites.

However, flexibility must be retained to reflect site-specific circumstances, different development types, and varying levels of risk. Single figures should not be applied rigidly. A figure around 17.5% could serve as a default for market-led development, with local authorities able to justify adjustments based on evidence and any local or site-specific circumstances.

**203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?**

Yes.

**a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.**

West Oxfordshire District Council considers that alternative, lower developer return figures could reasonably apply to certain site types, tenures, and development models. In particular, a 6% return on Gross Development Value for affordable housing tenures would provide clarity, reflect the lower-risk nature of these developments, and make viability assessments more transparent.

Lower figures may also be appropriate for developments with alternative economic models, such as long-term rental schemes, or for sites de-risked by public sector investment, where the potential for profit is reduced.

**204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?**

Yes.

**a) Please explain your answer.**

Greater specificity and certainty over profit expectations could be achieved by providing clear default benchmarks for different development types and tenures, while allowing local authorities to adjust figures based on robust evidence. This could include standardised assumptions for market-led housing, affordable housing, and long-term rental or build-to-rent schemes.

Transparency could be further supported through guidance on how risk, site complexity, and public sector investment are accounted for in returns.

**205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?**

The continued use of Gross Development Value (GDV) as a standard measure of developer return could be strengthened by providing clear, consistent definitions of what is included in GDV for the purposes of viability assessments. This should cover revenue from all relevant residential and commercial units, any affordable housing contributions, and associated non-residential uses where applicable.

Standardisation could also include guidance on timing assumptions, phasing, and treatment of exceptional or one-off revenues.

While alternative metrics such as Internal Rate of Return (IRR) or Return on Capital Employed may be useful in specific contexts, retaining GDV as a core benchmark, with clear, transparent rules, would provide consistency and reduce disputes between developers and local authorities.

**206) Do you agree there are circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please explain your answer.**

West Oxfordshire District Council partly agrees that alternative metrics, such as Internal Rate of Return (IRR) or Return on Capital Employed (ROCE), could in some circumstances support faster housing delivery or improve compliance with plan policies. These metrics can provide a more realistic assessment of cash flow and investment performance over longer-term, phased, or complex schemes, particularly for build-to-rent or multi-phase developments.

However, such metrics can be more volatile and complex and less transparent than profit on Gross Development Value. Their use should therefore be optional, applied only where they provide clear advantages, and supported by guidance to ensure consistency and comparability across schemes.

**207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?**

Potentially.

**a) Please explain your answer.**

West Oxfordshire District Council considers that alternative metrics to profit on Gross Development Value could be appropriately applied to specific types of development where standard GDV metrics may not fully reflect financial realities.

Using metrics such as Internal Rate of Return or Return on Capital Employed in these cases could improve accuracy in assessing viability, support delivery, and ensure compliance with plan policies, while maintaining GDV as the default measure for most standard market-led developments.

**208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) In what circumstances might a premium, or the usual premium, not be required?**

West Oxfordshire District Council strongly agrees that guidance should acknowledge that a landowner premium may not be required in all circumstances. Situations where a premium might not be necessary include sites that represent a financial or maintenance liability, land held by public sector bodies or charitable organisations prioritising wider public benefits, or land where disposal supports strategic planning objectives.

**b) What impact (if any) would you foresee if this change were made?**

Recognising these circumstances could improve the viability of development and encourage the release of land for delivery. However, care must be taken to ensure the change does not disincentivise private landowners from bringing land forward, or artificially suppress land values.

**209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please explain your answer.**

West Oxfordshire District Council strongly agrees that extant planning consents should not automatically be taken as proof of alternative use value. While alternative use value can provide useful context, it must reflect realistic market conditions and the likelihood of the land actually being developed for that use.

Assuming consents alone can inflate land values and reduce policy-compliant developer contributions, even where demand for the alternative use has lapsed.

Guidance should make clear that alternative use value is only relevant where it represents a viable, deliverable prospect consistent with up-to-date plan policies.

**210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used?** *Decision maker discretion / Another metric / Neither*

Decision maker discretion.

**a) If another metric, please set out your preferred approach and rationale.**

West Oxfordshire District Council considers that decision-maker discretion is the most appropriate approach. Viability assessments often involve site-specific circumstances, including market conditions, development risk, and local policy requirements, which a rigid metric such as time since consent was granted would not fully capture. Allowing discretion ensures that alternative use value is only considered where it genuinely reflects a realistic, deliverable development option, while preventing artificial inflation of land values and ensuring contributions remain consistent with plan policies.

**211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?**

The government should provide clearer guidance and safeguards to ensure non-policy compliant schemes are excluded from benchmark land value assessments. This could include requiring that any market evidence used is fully aligned with up-to-date plan policies, including

affordable housing and infrastructure contributions, and that any historic transactions are adjusted to reflect policy compliance costs.

**212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context.** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please explain your answer.**

West Oxfordshire District Council strongly agrees that residual land values should be cross-checked against comparable schemes. This provides a valuable check to ensure that viability assessments are realistic and not distorted by unusual assumptions or outlier data.

It would help decision-makers identify where a scheme's reported residual value may be inconsistent with market realities and would help to promote greater transparency and consistency in assessing contributions.

Care should be taken, however, to avoid penalising genuinely atypical but deliverable proposals.

**213) Do you agree that a 2.5 hectare threshold is appropriate?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council partly agrees that a 2.5-hectare threshold for medium development is appropriate, as it provides greater flexibility for sites in suburban and rural areas where average densities and necessary infrastructure mean slightly larger site areas are required to deliver 10–49 homes.

However, the Council has some concerns that even 2.5 hectares may still constrain certain sites, particularly in rural areas with larger plots or lower density development requirements. Flexibility should be retained to account for local site conditions, infrastructure needs, and green space provision, so that the threshold does not inadvertently exclude viable SME-led schemes.

**214) Do you agree that a unit threshold of between 10 and 49 units is appropriate?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

**a) Please provide your reasons, particularly if you disagree.**

West Oxfordshire District Council strongly agrees that a unit threshold of 10 - 49 homes is appropriate. This range is consistent with the emerging West Oxfordshire Local Plan 2043, reflects the scale of development typically delivered by SME developers, and supports a proportionate and targeted approach to planning for medium-sized sites.

**215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development? Yes/No.**

Yes.

**216) If so, please explain your answer and provide views on potential mitigations.**

While the proposed definition of medium development provides clarity and supports SME developers, there are potential risks that larger sites could be artificially subdivided to benefit from the easements, or that lower-density schemes could be delivered to fall within the 10–49 unit range.

Potential mitigations could include clear guidance in the Framework or supporting documents that prevents the artificial splitting of larger sites and ensures that any easements only apply where genuine SME-led medium-scale development is proposed. The use of model section 106 templates, including those tailored for medium sites would assist.

**217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?**

Yes, the small development exemption from the Building Safety Levy should be extended.

**a) Please provide your reasons.**

SME developers typically operate on tighter margins, and extending the exemption would help ensure that medium-scale sites remain viable, supporting delivery of housing in line with local plan targets, including the emerging West Oxfordshire Local Plan 2043.

Linking it to site area could introduce unnecessary complexity and administrative burdens.

**218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?**

Yes.

**a) Please provide your reasons.**

120 bedspaces for purpose-built student accommodation (PBSA) is an appropriate equivalent. Aligning with the ratio of 2.4 used in the Housing Delivery Test to convert PBSA bedspaces into net additional homes, will help to ensure consistency and provides clarity and certainty for developers and local planning authorities.

**219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.**

The exemption should continue to be based solely on dwellings and bedspaces, in line with the current approach. Introducing an area threshold could add unnecessary complexity and administrative burden for local authorities in calculating and monitoring the levy, without significantly improving fairness or targeting.

**220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.**

Extending the small developments levy exemption to cover sites of up to 50 dwellings and 120 student bedspaces is likely to have a positive impact on equality. By reducing costs for SME and medium-scale developers, it could help maintain or increase the delivery of smaller, more affordable homes, which often support households with protected characteristics, including younger people, low-income families, and disabled residents.

**221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.**

Extending the small development levy exemption to sites of up to 50 dwellings or 120 student bedspaces is likely to improve the economic viability of medium-sized schemes and support SME developers, who deliver a significant proportion of housing in West Oxfordshire. This change would help reduce upfront costs and encourage the timely delivery of new homes, including affordable housing, without materially affecting larger developers.

**222) Do you agree with the proposal to extend the Permission in Principle application route to medium development?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

**a) Please provide your reasons, particularly if you disagree.**

We do not agree with extending the Permission in Principle application route to medium development. While the current PIP process is useful for smaller sites, medium developments of 10 - 49 dwellings are generally too complex to be properly assessed through this streamlined route.

Such schemes often require detailed consideration of infrastructure, design, drainage, transport, and environmental impacts, which cannot be adequately addressed through the limited statutory information required for PIP.

Extending PIP to these sites risks undermining robust planning scrutiny, could result in unsuitable or poorly designed development, and would place additional pressures on local planning authorities to manage potentially contentious proposals without the full assessment that a standard planning application provides.

This would be a step too far and should not be pursued. Medium developments should continue to be considered via the full planning application process to ensure appropriate, sustainable outcomes.

**223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?**

Introducing a short planning statement for such larger schemes would not address the fundamental issue that medium developments are too complex to be considered under the PIP route. The PIP process is intended for minor sites where impacts are limited and easily assessed. Medium developments require a full planning application to properly consider matters such as design, infrastructure, transport, drainage, and environmental effects. Any attempt to compress these considerations into a short statement would risk inadequate scrutiny and could undermine the quality and sustainability of development.

**224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.**

No.

**225) Is there anything that could be done to mitigate any impact identified?**

No.

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