

ED21 – Salt Cross AAP MM responses and Council’s comments

MM Reference Number	Representor	Agent (where applicable)	ID	Summary of issues raised	WODC Response
General comment	CPRE		14	CPRE Oxfordshire supports the intent of the proposed modifications but argues that the current wording weakens enforceability and lacks binding safeguards. They call for stronger, legally enforceable commitments across several areas: climate and net-zero integrity, landscape and green belt protection, transport infrastructure, and governance. Specifically, they want absolute and verifiable net-zero targets (including embodied emissions), strict offsetting limits, and delivery mechanisms tied to planning consent. Further concerns include ensuring landscape-led design with biodiversity gains above statutory requirements, enforceable transport interventions before occupation, and clear phasing triggers for essential infrastructure. They also demand transparent governance with community representation, alongside statutory monitoring, annual public reporting, and remedial measures if targets are missed. Without these changes, CPRE Oxfordshire considers the modifications unsound.	The 'in principle' support expressed is noted and welcomed. The concerns expressed are also noted but in many instances relate to issues beyond the immediate scope of Policy 2 (e.g. BNG, transport, Green Belt and phasing of infrastructure). In relation to those comments that do fall within the scope of Policy 2, these are duly noted but Officers consider that the policy as proposed to be modified strikes an appropriate balance in terms of its specificity and enforceability.
No comment	Historic England		26	No comment.	Noted.
General comment	Rosalind Kent		28	The respondent is in favour of the Salt Cross AAP Policy 2 only insofar as it incorporates maximum opportunity for insulation and for renewable energy generation on all the houses and associated land.	Support noted.
General comment	Oxfordshire County Council		38	Policy 2 is welcomed and supported. No further comment provided.	Support noted.

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General comment	Grosvenor	Prior and Partners	42	Grosvenor remains fully committed to delivering the Garden Village and supports the adoption of the Area Action Plan (AAP), provided that certain Main Modifications are made to ensure it is sound. The proposed Main Modifications generally offer clearer policy requirements and align with the Inspector's expectations in ED16, and Grosvenor therefore supports them, along with ED19 and the Sustainability Appraisal approach used for the revised hearings. However, some concern, particularly around monitoring requirements have not yet been fully addressed. These outstanding issues are detailed in Appendix A, which consolidates WODC's Main and Additional Modification tables (ED18 and ED20) into a single format to clearly present Grosvenor's position. The key soundness issues from Appendix A are summarised separately.	In principle support noted. See further comments below in relation to the various specific issues of concern raised.
General comment	Grosvenor	Prior and Partners	42	Grosvenor remains concerned that no evidence supports the requirement for 100% on-site energy generation. They expected the clarified energy hierarchy to allow some flexibility for using nearby solar developments to meet any residual needs, which would support efficient land use at Salt Cross.	The comments are noted. However, WODC would refer to paragraph 24 of ED16 which deals with this issue in the context of evidence set out in ED9B and says nothing about making provision for off-site renewable energy generation. Rather, it refers to renewables being provided on building, on plot and across the wider garden village development in accordance with the findings of ED9B.
General comment	Grosvenor	Prior and Partners	42	Grosvenor has consistently argued that the extra costs in Policy 2 place significant pressure on a scheme already at the edge of viability. ED16 acknowledges this, noting that while Policy 2 adds further strain, viability is influenced by wider factors such as construction costs, inflation, land values, profit levels, and infrastructure requirements. The Inspector also records that affordable housing and Section 106 costs will be subject to viability testing and negotiation, helping maintain overall deliverability. There is a shared understanding, reflected in the SoCG (ED14), that policy must be applied pragmatically given changing economic conditions and evolving infrastructure plans, including the amended A40 HIF scheme. Ensuring Salt Cross is deliverable will depend on balancing ambitious targets with a flexible policy framework.	Noted.

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General comment	Grosvenor	Prior and Partners	42	Grosvenor welcomes the planned AAP adoption timeline and stresses the need for the Inspector to provide clearer wording and guidance on certain modifications (as noted in Appendix A) to ensure the AAP is justified and consistent with ED16.	Noted.
MM16	Grosvenor	Prior and Partners	42	Further modifications are needed because evidence in ED9B shows rooftop PV cannot meet 100% of energy demand, a point acknowledged in ED16. Grosvenor therefore recommends deleting paragraph 5.52 via MM16 and reading this alongside MM14 to allow off-site renewable generation consistent with retained Figure 5.7.	The comments are noted. The proposed Main Modifications to paragraph 5.52 outlined in MM16 are consequential changes arising from the preceding changes to paragraphs 5.50 and 5.51 and simply emphasise the conclusions reached in earlier energy modelling undertaken by the Energy & Power Group (University of Oxford) and EDF Energy R&D UK. It is however acknowledged that this does not fully align with the findings set out in ED9B which shows that it is not possible to meet 100% of energy demand via rooftop PV. There is therefore a potential conflict with MM14 and WODC would not object to paragraph 5.52 being deleted through MM16 if the Inspector considered this to be appropriate. WODC is however concerned about the suggestion that the AAP should allow for an element of residual off-site renewable energy generation. Figure 5.7 is illustrative only and as outlined above, WODC would refer to paragraph 24 of ED16 which deals with this issue in the context of evidence set out in ED9B and says nothing about making provision for off-site renewable energy generation. Rather, it refers to renewables being provided on building, on plot and across the wider garden village development in accordance with the findings of ED9B.
MM17	Grosvenor	Prior and Partners	42	Additional changes to MM17 are needed to remove reference to the Net Zero Carbon Building Standard, aligning it with MM23 and the Inspector's direction in ED16. As written, paragraph 5.54 describes policy development rather than providing clear guidance for future interpretation.	The Council does not agree that reference to the Net Zero Carbon Building Standard needs to be removed from paragraph 5.54. The text is simply summarising the content of ED9B to provide context for Policy 2 and there is not considered to be any misalignment with MM23 or the findings set out in ED16.
MM19	Grosvenor	Prior and Partners	42	Subsequent guidance and the requirements as set out in this paragraph have not been subject to examination or provided in the current evidence base. MM19/MM20 need amendment to clarify that each application must demonstrate how it complies with the amended Policy 2, in coordination with the Council as the emerging guidance referenced in MM20 is developed, since this guidance has not yet been examined or evidenced.	Comments noted. This issue has been the subject of consideration through the examination and it was agreed that the proposed main modifications to Policy 2 and the supporting text lacked sufficient clarity around monitoring and evaluation arrangements. MM19 seeks to respond to the recommendations of ED16 (Para. 27) by providing greater clarity over proposed monitoring and evaluation arrangements. This will be further augmented with a separate guidance note as explained in new paragraph 5.57 (MM20). No further amendment is considered necessary.

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MM20	Grosvenor	Prior and Partners	42	MM19/MM20 should clarify that each application must show how it meets the amended Policy 2, in coordination with the Council as the emerging guidance in MM20 is developed.	As outlined above in relation to MM19, no further amendment is considered necessary.
MM20	Grosvenor	Prior and Partners	42	The Inspector in ED16 noted that the policy's monitoring measures are unclear, unenforceable, and unjustified. MM20 defers monitoring guidance to later pre-application stages, so Grosvenor proposes that the supporting text explicitly recognises that applicants should be able to propose a monitoring mechanism ahead of this guidance being produced. This approach avoids delaying planning application determinations, addresses long-standing concerns, and balances policy requirements with practical delivery, particularly at the Reserved Matters stage.	Comments noted. The District Council intends to commission the proposed guidance note very shortly. No change is considered necessary. If an applicant were to put forward monitoring and evaluation proposals ahead of any such guidance being produced, it would be considered on its merits. Officers do not consider that this possibility needs to be explicitly referenced in the supporting text.
MM23 - Introduction	Grosvenor	Prior and Partners	42	As set out in the body of this response, this amendment is likely to be key to the successful delivery of Salt Cross and is supported.	Support noted.
MM23- Ultra-Low Energy Building Fabric	Grosvenor	Prior and Partners	42	To align with MM21, "Monitored post completion" should be revised to "validated post-completion" to clarify that monitoring does not extend into the occupancy stage.	MM21 refers to the submission of an overall energy strategy which is to be re-confirmed at pre-commencement and validated pre-occupation both at the outline and detailed planning stages (see also MM23 - Energy Strategy). MM23 - Ultra-low energy building fabric is referring more specifically to the requirement for development to meet the specific space heating demand KPI at the detailed planning stage which would need to be monitored post completion in accordance with MM19. No further change considered to be needed.
MM23 - Energy Efficiency	Grosvenor	Prior and Partners	42	ED16 notes that the policy's application across phased, multi-developer sites is unclear and requires a MM. This is not addressed in MM23, and Grosvenor suggests deleting "and applied consistently across all building types" to resolve the issue.	The comment is noted but the Council does not agree that a further change is required. The proposed main modifications have been agreed with the Inspector and are considered to adequately address the concerns outlined in ED16 regarding clarity of approach for multi-phase developments.
MM23 - Zero Operational Carbon Balance	Grosvenor	Prior and Partners	42	Grosvenor notes there is no evidence that 100% on-site energy can be achieved. MM23 should be amended to remove "on-site" and instead require "100% of the development's energy demand must be met through renewable energy, such as solar PV," allowing the policy to achieve the same outcome while following the Council's energy hierarchy.	See earlier WODC response to comments made in respect of MM16. No further change considered to be needed.

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General comment	Witney Town Council		57	The Town Council welcome the amendments to the Salt Cross Area Action Plan. Members praise the advancements to move away from the reliance on fossil fuels and to provide Net Zero housing within the local area. Salt Cross is a blank canvas on which to seize the opportunity to place Climate Action at the forefront of both the District and Town Council's climate emergency declarations.	Support noted.
General comment	Michael Saffrette		220	Proposed changes fully supported as being overdue and essential to tackling climate change. WODC should be congratulated on pushing these proposals forward.	Support noted.
General comment	Kim Weetman		221	Proposed changes supported. Suggestion made that the A40 should be made a dual carriageway from Witney towards Oxford.	Support noted. The other issue mentioned regarding transport and the dualling of the A40 falls outside the scope of this consultation.
General comment	Tony Chalkly		222	The Council should stipulate that all buildings should have solar panels when constructed coupled with battery storage. The Council should also stipulate the use of grey water storage.	The comments are noted. Policy 2 as proposed to be modified stipulates a requirement for no fossil fuels through the use of renewable energy including solar. However, based on the supporting technical evidence, the policy recognises that it may not be possible in all circumstances for 100% of the energy required by a building to be met by solar provision on that building and that in such circumstances, it will be necessary to consider the wider building plot or the wider garden village site as a whole. With regard to the comments on grey water recycling, the issue of water efficiency is addressed through other AAP policies including Policy 10 - Water Environment.
General comment	Faye Ayres		223	The respondent has expressed general concerns about the traffic impact of strategic growth in this location.	The concerns expressed are noted but are not of relevance to the proposed main modifications to Policy 2.
No comment	Canal and River Trust		224	No comment	Noted.

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No comment	Natural England		225	No comment	Noted.