

to Planning Policy Team  
West Oxfordshire District Council  
Council Offices,  
Witney,  
OX28 1NB

Emailed to: [planning.consultation@westoxon.gov.uk](mailto:planning.consultation@westoxon.gov.uk) and  
[Chris.Hargraves@westoxon.gov.uk](mailto:Chris.Hargraves@westoxon.gov.uk)

date 13/11/2025

subject **Salt Cross AAP – November 2025 Main modification response on behalf of Grosvenor**

Dear Planning Policy team, Inspector,

This response to the Main Modifications and Additional Modifications (under ED18 and ED20) is submitted on behalf of Grosvenor Developments Limited (“Grosvenor”). Grosvenor represents a consortium of landowners that controls the majority of the land required for the Salt Cross Garden Village. Grosvenor submitted an outline planning application (OPA) for the Garden Village in July 2020 which remains undetermined.

Grosvenor strongly supports, and is fully committed to, progressing the delivery of the Garden Village. Grosvenor’s written and oral representations to the Examination in Public emphasised that the concerns that Grosvenor has in respect of the Area Action Plan (AAP) do not go to the principle of whether or not the AAP can and should be adopted, but can be addressed by Main Modifications to make the AAP sound.

It is therefore crucial that this Main Modification process supports and enables the delivery of Salt Cross. It is considered the Main Modifications as drafted provide much needed clarity in policy requirements and broadly reflect the Inspector’s requirements in ED16. As a result these are supported, as is ED19 and the overall Sustainability Appraisal approach to the revised hearings.

However, there are instances where the concerns raised during the hearings and in the Inspector’s note (ED16) are not adequately addressed at this stage, particularly related to monitoring requirements. These are set out comprehensively in Appendix A which replicates WODC’s Main Modification and Additional Modification tables in ED18 and ED20. These are combined to avoid submitting a significant scale of individual forms and is hoped is an easier format to convey the Grosvenor position on the Main Modifications as a whole. The key soundness issues identified in Appendix A are summarised below.

[REDACTED]

[REDACTED]

The Inspector flagged in ED16 that:

*“It is unclear how metering in particular could be achieved, how such measures could be enforced and how monitoring arrangements are to be resourced.... This section of the Policy is unjustified and ineffective. The Council should reconsider how monitoring could be achieved and put forward suggested amendments to the policy accordingly”.*

Regarding MM20, additional guidance on monitoring arrangements are devolved to future stages of pre-application engagement instead of providing evidence for how monitoring could be achieved at this stage. We therefore believe it is appropriate for Applicants to have the explicitly endorsed ability, via supporting text, to suggest a monitoring mechanism ahead of this guidance being produced. This would avoid preventing the determination of planning applications (particularly when at the outline stage) being determined whilst the LPA produces and consults upon this additional guidance. The monitoring requirements associated with the policy as drafted has been a known concern raised at the original hearings and no satisfactory arrangements have been identified in the interim to alleviate the soundness concerns highlighted.

This proposal would allow the AAP to be adopted without delay – namely by not requesting the examination process be extended to allow for the Council to evidence the effectiveness of the policy requirements through additional details for the monitoring arrangements at this stage- and in practice would avoid introducing another layer of plan making ahead of the determination of the submitted planning application. We consider this is an appropriate and pragmatic approach balancing delivery with the policy requirements, particularly where these are likely to have most effect at the Reserved Matters stage via a condition on the outline permission.

As captured in ED15, another item Grosvenor raised which was explored during the hearings was the concern that there is no evidence provided which explores the impact of requiring 100% energy generation on site. Whilst we appreciate that the Inspector’s letter has set out a clarified policy hierarchy (on building, on plot and then on site), we had understood that this would focus on maximising opportunities to this hierarchy, but also allow for flexibility for a residual element of this to be provided by adjacent generation (as set out in retained figure 5.7). This is particularly pertinent given the large scale of submitted and pending planning applications for solar panel energy generation in the vicinity which could serve future development in the area, without fettering the efficient use of land at Salt Cross.

Regarding viability, Grosvenor’s position has been consistent that the additional costs proposed by Policy 2 imposes an additional and high burden on a scheme that is already at the limits of viability, due to existing requirements found sound at earlier stages of the Examination.

It is welcomed therefore that this is clearly articulated in ED16 via the following:

*“Taking account of both the Council’s evidence and that of the representor, it is clear that viability is an issue for the Garden Village development, though there is*

*disagreement on the extent to which the development is unviable. I accept that the cost of Policy 2 adds additional pressure on the overall viability of the scheme. However, I also recognise that the delivery of net zero is not the only factor affecting scheme viability. Increased overall construction costs, inflation, profit levels, land values, and infrastructure costs all have an impact.... The Council stressed at the hearing that the delivery of the Garden Village is a priority. In line with Policy 23 of the AAP, affordable housing provision is subject to a viability clause. Furthermore, the Council confirmed at the hearing that section 106 infrastructure costs would be the subject of negotiation. The development should therefore remain viable."*

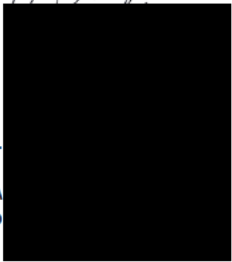
There is a shared understanding, as captured in the SoCG (ED14) , that the application of policy will need to be considered in the context that significant time has passed since the original hearings and there have been changes to wider economic conditions, notably related to construction costs and inflation, but also related to the progress of adjacent schemes and integration with infrastructure projects, notably the amended A40 HIF scheme currently going through determination. The successful delivery of Salt Cross will rely upon the application of the pragmatic policy framework reached which seeks to balance a number of supported and ambitious targets, against the need to ensure this does not undermine overall deliverability.

We note that October 2025 version of the Local Development Scheme targets adoption of the AAP in December/January 2026. We hope that this timescale will be met and the OPA determined in a timely manner. As a key next step to achieve this, we believe it is appropriate for the Inspector to suggest additional wording for the identified modifications (as flagged below in Appendix A), as well as to provide clear directions in their interpretation potentially manifesting in additional requests for supporting text via additional modifications) in the forthcoming Inspector's report to aid in determination and provide clarity for future interpretation. This is required to ensure that the proposed modifications and AAP are both consistent with ED16 and justified.

We are very happy to discuss any aspect of this response if helpful.

Yours sincerely,

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Appendix A – Grosvenor commentary on Main/ additional modifications.

REF		Main / Additional Modification	Reason for Main / Additional Modification	Grosvenor comments
MM16	Paragraph 5.52	<p>Amend paragraph as follows:</p> <p><del>It also concludes that 100% of the energy consumption required by buildings on-site can be generated using on-site renewables, for example through solar PV. This conclusion</del> is supported by the Garden Village Energy Plan with energy modelling undertaken by the Energy &amp; Power Group (University of Oxford) and EDF Energy R&amp;D UK demonstrating that with roof top solar PV alone, sufficient capacity could be installed to meet the modelled energy demand for the development.</p>	<p>For effectiveness and to reflect the content of the updated evidence set out in ‘Policy 2 – Net Zero Carbon Development Evidence Base (March 2025)’.</p>	<p>Supplementary modifications considered required to reflect evidence base ED9B’s conclusions which did not demonstrate that rooftop PV could provide 100% of the predicted energy demand. This is flagged in ED16 (paragraph 24) where it references for “certain residential typologies this cannot be achieved on the building alone”.</p> <p>We suggest MM16 is updated such that paragraph 5.52 is removed in its entirety.</p> <p>As set out in the body, we consider this should be read in combination with MM 14 to allow for offsite renewable generation, in line with retained figure 5.7.</p>

[REDACTED]

[REDACTED]

REF		Main / Additional Modification	Reason for Main / Additional Modification	Grosvenor comments
				This is to respond to large scale PV applications currently pending, which should not be prevented at this stage and to make the policy justified.
MM17	Paragraph 5.54	<p>Amend paragraph as follows:</p> <p>The net-zero carbon report <u>highlights the importance of reducing embodied carbon and suggests that development proposals will need to demonstrate attempts to reduce embodied carbon to meet the upfront carbon limits in the UK Net Zero Carbon Buildings Standard. Calculations will be required at the outline and detailed planning stages, proportionate to the level of information available, with full lifecycle modelling strongly encouraged at the detailed planning stage.</u> <del>recommends that embodied carbon calculations are carried in support of any outline and detailed planning submissions, reconfirmed pre-commencement and validated pre-occupation. The report identifies a specific target for upfront embodied carbon emissions for residential and non-residential buildings of &lt; 500 kg CO<sub>2</sub>/m<sup>2</sup>.</del></p>	<p>To reflect the content of the updated evidence set out in 'Policy 2 – Net Zero Carbon Development Evidence Base (March 2025)'.</p> <p>For effectiveness and to also recognise that in relation to the consideration of embodied carbon at the outline and detailed planning stages, any such assessment will need to be proportionate to the level of information available.</p>	Supplementary modifications are considered required to MM17 to remove reference to Net Zero Carbon Building Standard to align with amendments made under MM23/ direction from Inspector in ED16 paragraph 25 and to ensure clarity in future interpretation. As drafted, paragraph 5.54 is a summary of the policy development instead of interpretation.

REF		Main / Additional Modification	Reason for Main / Additional Modification	Grosvenor comments
MM19 and MM20	New Paragraph 5.56 and New Paragraph 5.57	<p>Insert new paragraph as follows:</p> <p><u><b>A representative sample of buildings will be subject to POE within an agreed period after occupation, with subsequent monitoring and reporting undertaken for a proportionate period thereafter. Verified performance data will be provided to the Council at intervals to be agreed. Where evaluation or monitoring identifies a material performance gap against the approved Energy Strategy, the developer will work with the Council to agree appropriate remedial measures, which may include adjustments to later phases of development.</b></u></p> <p>Insert new paragraph as follows:</p> <p><u><b>The District Council intends to publish a guidance note setting out how this and other aspects of Policy 2 can be addressed and implemented in practice.</b></u></p>	<p>For effectiveness to reflect the proposed Main Modification to Policy 2 in relation to the requirement for post-occupancy evaluation (POE) monitoring and reporting.</p> <p>For effectiveness to reflect the proposed Main Modification to Policy 2 in relation to the requirement for post-occupancy evaluation (POE) monitoring and reporting.</p> <p>And also to reflect the fact that the Council intends to publish further guidance on this and other aspects of Policy 2 as proposed to be modified.</p>	<p>As set out in the body, subsequent guidance and the requirements as set out in this paragraph (via MM19) have not been subject to examination or provided in the current evidence base.</p> <p>MM19/MM20 should be amended to capture that each application should be responsible for identifying how they propose the amended Policy 2 to be considered, working with the Council on the emerging guidance referenced in MM20 which may take some time to develop.</p>



REF		Main / Additional Modification	Reason for Main / Additional Modification	Grosvenor comments
MM23 (split)	Introduction	<p>Policy 2 – Net-Zero Carbon Development</p> <p><del>Proposals for development at Salt Cross will be required to demonstrate</del> <u>All development at Salt Cross is expected to contribute to the delivery of</u> net zero operational carbon on-site through ultra-low energy <u>building fabric specification</u>, low carbon technologies and <del>on-site</del> renewable energy generation. <del>An energy strategy will be required with outline and detailed planning submissions, reconfirmed pre-commencement, validated pre-occupation and monitored post-completion demonstrating alignment with this policy.</del></p> <p><u>The specific policy requirements outlined below are expected to be met in full unless there are clear and demonstrable technical or viability constraints. In such circumstances, applicants must provide robust justification for any departure and demonstrate that:</u></p> <ul style="list-style-type: none"> <li><u>- All reasonable steps have been taken to comply with the policy;</u></li> <li><u>- The approach represents the maximum feasible delivery of net-zero outcomes; and</u></li> <li><u>- Particular priority has been afforded to achieving the stated space heating and energy efficiency targets.</u></li> </ul>	<p>For effectiveness and to recognise that technical issues may mean the policy requirements cannot be met and that viability challenges require some flexibility.</p>	<p>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.</p>

REF		Main / Additional Modification	Reason for Main / Additional Modification	Grosvenor comments
MM23 (split)	Ultra-Low Energy Building Fabric	<p><u><b>Ultra-Low Energy Building Fabric</b></u>  <del>Proposals will need to use ultra-low energy fabric to achieve the KPI for Buildings must be designed to achieve a space heating demand of less than &lt;15 20 kWh/m2.yr verified via predictive energy modelling at the detailed planning stage and monitored post-completion.</del> <del>demonstrated through predicted energy modelling. This should be carried out as part of any detailed planning submission, reconfirmed pre-commencement, validated pre-occupation and monitored post-completion.</del> <u>Proposals that achieve exemplary performance (&lt;15 kWh/m2.yr) will be particularly supported.</u></p>	The need for improved clarity regarding the space heating demand requirement.	To align with the amendments to the monitoring framework under MM21, 'Monitored post completion' should be amended to say 'validated post-completion' to clarify monitoring requirements for this policy limb do not extend into the occupancy stage.
MM23 (Split)	Energy Efficiency	<p><u><b>Energy Efficiency</b></u>  <del>Energy budgets (EUI targets) must be demonstrated using predicted energy modelling. The following KPI targets will apply:</del>  <u>All residential properties, offices and schools should achieve the following sector specific energy use intensity (EUI) targets at the design and construction stage:</u></p> <ul style="list-style-type: none"> <li>- Residential &lt;35 kwh/m2.yr</li> <li>- Office &lt;70 55 kwh/m2.yr</li> <li>- <del>Research labs &lt;55-240 kwh/m2.yr*</del></li> <li>- Retail &lt;80 kwh/m2.yr</li> </ul>	<p>To clarify that the policy requirements relating to energy use intensity targets relate to the design and construction stage.</p> <p>To provide increased clarity regarding the approach to be taken in respect of predictive energy modelling.</p> <p>For effectiveness, to remove reference to</p>	<p>ED16 states in Paragraph 21 that "It is unclear how this applies across a phased development which would be built out by different developers. A MM is required to rectify this". This is not included under MM23.</p> <p>We suggest this omission could be addressed through the deletion of "and applied consistently across all building types" from this aspect of the policy.</p>



REF		Main / Additional Modification	Reason for Main / Additional Modification	Grosvenor comments
		<p><del>- Community space (e.g. health care) &lt;100 kwh/m2.yr</del>  <del>- Sports and Leisure &lt;80 kwh/m2.yr</del>  <del>- Schools &lt;65 kwh/m2.yr</del></p> <p><u>EUI targets for other uses will be agreed with the District Council through pre-application discussions.</u></p> <p><u>A validated, predictive energy modelling approach must be agreed with the District Council and applied consistently across all building types. This modelling should be carried out as part of any detailed planning application, re-confirmed pre-commencement and confirmed pre-occupation, based on as-built information.</u></p> <p><del>To ensure best practice, an accurate method of predictive energy modelling, agreed in consultation with the District Council, will be required for a cross-section of building typologies (e.g. using Passive House Planning Package – PHPP or CIBSE TM45 or equivalent). This modelling should be carried out with the intention of meeting the target EUIs as part of the detailed planning submission, be reconfirmed pre-commencement, validated pre-occupation and monitored post completion.</del></p>	specific energy modelling types given they may be superseded and to instead include within the supporting text.	
MM23 (Split)	Zero Operational Carbon Balance	<p><i>Zero Operational Carbon Balance</i></p> <p>100% of the <u>development's energy demand must</u></p>	To more accurately reflect the updated evidence set out in 'Policy 2 – Net Zero	As referenced in the body and in response to MM14 there is no evidence provided that this aspiration can be achieved.

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		<p><u>be met through on-site renewable energy, such as solar PV. Developers will be expected to demonstrate through an Energy Strategy (see below) that all opportunities to maximise renewable energy generation on individual buildings have been identified. Where it can be shown that this is not technically feasible, it should be maximised on plot or across the wider site.</u></p> <p><del>energy consumption required by buildings on-site should be generated using on-site renewables, for example through Solar PV. The quantum of proposed renewable energy for the whole site (outline planning) and each phase (detailed planning) should be shown in kWh/yr. The amount of renewable energy should equal or exceed the total energy demand for the development in order to achieve net zero operational carbon as a whole.</del></p> <p><del>The energy strategy should state the total kWh/yr of energy consumption of the buildings on the site and the total kWh/yr of energy generation by renewables to show that the zero-carbon operational balance is met. An explanation should be given as to how these figures have been calculated.</del></p> <p><del>Renewable energy contribution calculations should be carried out as part of the outline and detailed planning submissions, be reconfirmed pre-</del></p>	<p>Carbon Development Evidence Base (March 2025)' in relation to the zero operational carbon balance – recognising more fully that renewable energy may need to be provided on- plot or across the wider site.</p>	<p>To make the Policy 2 effective and consistent with the evidence base, this aspect of MM23 should be amended to remove the reference to 'on-site' in the first line and to read "100% of the development's energy demand must be met through renewable energy, such as solar PV".</p> <p>This would allow the remainder of the policy to remain unchanged referencing the same outcome of 100% and also for it to be maximized across the Council's proposed hierarchy.</p>

REF		Main / Additional Modification	Reason for Main / Additional Modification	Grosvenor comments
		<p><del>commencement, validated pre-occupation and monitored post-completion.</del></p> <p><del>A detailed low and zero carbon viability assessment should be carried out in support of the energy strategy detailing the selection of on-site low and zero carbon energy technologies.</del></p>		