

**WALLINGFORD NEIGHBOURHOOD PLAN  
REVIEW  
CONSULTATION STATEMENT  
May 2024**

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## 1 Introduction

1.1 Wallingford was formally designated as a Neighbourhood Plan Area on 1st May 2015 under Section 61G of the Town and Country Planning Act 1990 as amended by the Localism Act with Wallingford Town Council being the qualifying body. The Wallingford Neighbourhood Plan was made in May 2021. This consultation statement is for the Wallingford Neighbourhood Plan Review.

1.2 The Wallingford Neighbourhood Plan (WNP) is a community-led planning document, written by a Steering Group of local residents together with members of Wallingford Town Council. Neighbourhood Plans are part of the Government's approach, introduced in the Localism Act 2011 giving local people a greater say in the future of their community.

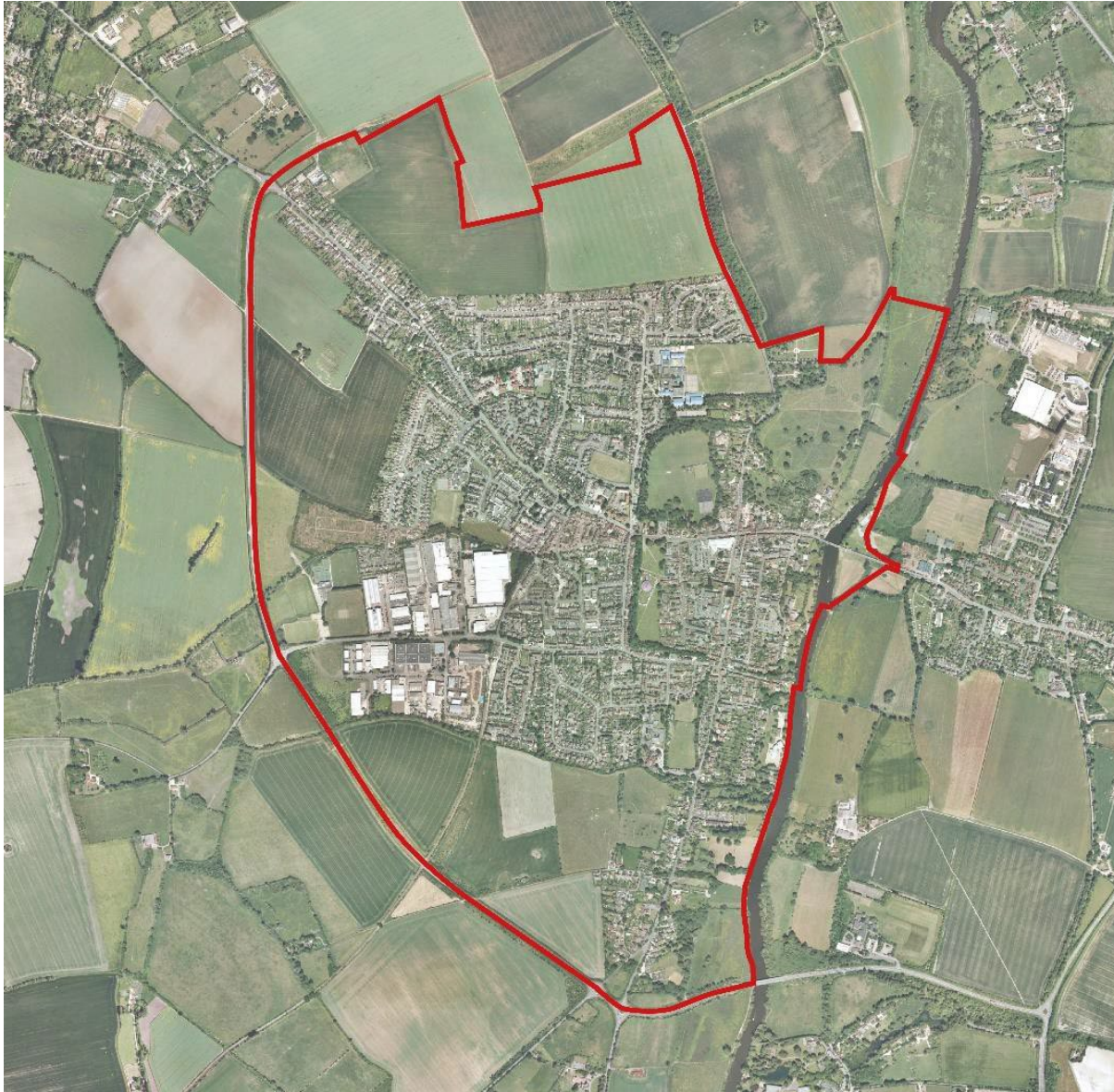
1.3 The WNP provides a planning tool to guide the long-term future of the Town and its countryside. The made WNP 2021 covered the period from 2019 to 2035. The Review Plan will cover the period from 2024 to 2035. The Plan contains a vision for the area and sets out planning policies to achieve this. In our view, the WNP Review represents a strong and robust approach to the Localism agenda. Within this context it has been designed to deliver the South Oxfordshire Local Plan 2035.

1.4 The Neighbourhood Planning (General) Regulations 2012 requires that where a qualifying body submits a plan proposal to the local planning authority, it must include:

- (a) a map or statement which identifies the area to which the proposed neighbourhood development plan relates;
- (b) a consultation statement;
- (c) the proposed neighbourhood development plan; and
- (d) a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.

1.5 The consultation statement referred to is identified in section 15 (2) of Part 5 of the Regulations as a document which:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted; and
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.'



*Map 1: Map of Wallingford Neighbourhood Plan boundary in red*

1.6 Map 1 shows the boundary for the Wallingford Neighbourhood Plan area, as confirmed by South Oxfordshire District Council (as Local Planning Authority) on 1 May 2015, and subsequently following absorption of Winterbrook into the Plan area. Map 1 covers the main town and surrounding land up to the adjacent parishes of Brightwell-cum-Sotwell, Cholsey and Crowmarsh Gifford.

## **2 The Process**

2.1 Much of the WNP 2021 is still relevant and up to date. This Review does not seek to change the overall approach and local strategy set out in the 2021 Plan, rather it aims to assess:

- whether policies need changing as a result of the adoption of the South Oxfordshire Local Plan 2035, or changes to the NPPF 2023, or other material considerations
- whether work has been undertaken so that policies are no longer needed
- whether policies have not worked as well as intended and need adjustment
- whether there were gaps in the suite of policies which need to be filled

Consultation is seen as a bedrock of Neighbourhood Planning, as it serves to embed local interest and reality into Plans. This principle has been accepted from the start by Wallingford. We have sought to capture the requirements and aspirations of our diverse community, and to ultimately go on to translate those into effective policies for the benefit of the town.

2.2 At each key point in our journey to produce the Neighbourhood Plan we have looked at how we have carried out our consultation, using four key measures, to confirm we truly reflect local needs. The four key measures for consultation were:

- (1) Being specific about who we were consulting and why, to make sure we were talking to the right people, so that we reinforced that the Plan is locally driven;
- (2) Ensuring we have accurately described the issues and concerns expressed by those consulted
- (3) Making sure there was a logical pattern to our focussed consultation so that it synchronised with key phases of development of the Plan Review; and
- (4) Ensuring feedback was taken into consideration when important decisions were taken on the construction and vision of the Plan Review.

2.3 The Town Council website was used to host information about the Neighbourhood Plan Review as it progressed, so that it was an easily locatable source for all residents. Regular and frequent posts on the Town Council’s Facebook page linked to the website throughout the Regulation 14 consultation from 3 February to 6 April 2024.

2.4 The Window for Wallingford, a free monthly community magazine distributed to 4000 homes, town centre businesses and community organisations, was routinely used to promote the progress of the Plan and to advertise the consultation events. This is a long-standing publication which is widely viewed as the definitive source of local information. It is particularly valued by older residents. The Wallingford Herald newspaper published articles about the WNP Review consultation.

2.5 In July 2023 Wallingford Town Council set up a Neighbourhood Plan Working Group co-chaired by Cllr Hendrie from the Town Council, and Wendy Tobitt who had worked on the preparation of WNP 2021. This Working Group combines residents who worked on WNP 2021, and residents who moved to Wallingford since 2020; they represent the local branch of Living Streets, and people living on Highcroft, a new housing development currently under construction.

### **3. Public Engagement and Consultation**

3.1 The **Public Engagement** process opened on 22 September 2023 and closed on 3 November 2023. The Town Council published the Policies in the made WNP 2021, and invited residents and people working in Wallingford to comment on them, and suggest new Policies that could be considered for inclusion in the Review. There was an online survey for people to give their responses. Printed response forms were in Wallingford Library and the Town Information Centre which had printed copies of the WNP 2021. This was publicised through the Town Council website, posters on noticeboards and social media, Wallingford Herald newspaper, Window on Wallingford magazine delivered to all residents, Connecting Wallingford community event. The report of this Public Engagement process is given at Appendix B.

3.3 The **Regulation 14 consultation** was held from 3 February to 6 April 2024. The draft Review Plan was published on the Town Council website in two documents: one with Tracked Changes, and one without, with the Modifications Statement. Printed copies were available in the Town Information centre and Wallingford Library, with printed forms for people to give their responses. A description of the consultations and the impact on the emerging Wallingford Neighbourhood Plan, is provided below and Appendix D.

3.4 Residents, local community organisations, statutory bodies and local businesses were invited to examine and comment on the draft Review Plan prepared by the Working Group. List of statutory consultees, community organisations and local businesses is given in Appendix C.

3.5 Public exhibitions of the Review Plan were held on 23 and 24 February. Feedback received was reviewed by the Working Group and where appropriate incorporated into the Review Plan. The consultation activities are shown in Table 1.

**Table 1: Public Engagement and Consultation activities for the Wallingford Neighbourhood Plan Review**

<b>Public Engagement and Consultation</b>	<b>Open date</b>	<b>Close date</b>
<p>Public Engagement</p> <p>Wallingford Town Council invited residents to comment on the Policies in the WNP 2021. People were invited to respond to three questions:</p> <ul style="list-style-type: none"> <li>• which policies would you change and why</li> <li>• which policies are no longer required</li> <li>• what policies would you like to see in the revised Wallingford Neighbourhood Plan and why</li> </ul> <p>Submissions received by online form from 14 people. One report by email received from Boyer on behalf of Croudace.</p> <p><b>Appendix B</b> includes actions taken by the Working Group. WTC ppt document available.</p>	22/09/23	03/11/23
<p><b>Regulation 14 consultation</b></p> <p>Review Plan documents published on Wallingford Town Council website with an online response form. Consultation and public events publicised through social media, posters, local newspaper, SODC website and Window on Wallingford magazine.</p> <p>Public consultation events on 23 and 24 February in the Ridgeway Community Church, St Mary’s Street, Wallingford attended by 60 people who discussed the Plan with members of the Working Group. Display boards showed proposed Built-up area Boundary and policy for Medical Centre on Site E, Winterbrook Meadows.</p> <ul style="list-style-type: none"> <li>• 18 responses received by email, including statutory consultees.</li> <li>• 31 responses received via online form, these include 7 written responses handed in at the public consultation events on 23 and 24 February.</li> </ul> <p><b>Appendix C list of consultees</b> <b>Appendix D comments submitted, WNP Working Group responses and plan changes</b></p>	03/02/24	06/04/24

3.4 The following statutory consultees responded; their comments are included in **Appendix D**:

- Historic England
- Natural England
- Oxfordshire County Council
- South Oxfordshire District Council
- Thames Water
- ONR

- MIGWAL
- Berkeley Homes (Oxford & Chiltern) Limited
- Croudace Homes
- L&Q Estates
- David Wilson Homes
- Nicholas King Homes

3.5 At the conclusion of Regulation 14 Consultation the Working Group considered, discussed and reviewed the comments and responses received against the Review Plan proposals, the Plan was altered where appropriate. **Appendix D** is the report of the Regulation 14 consultation.

#### 4. Conclusion

4.1 This Consultation Statement and the supporting consultation reports are considered to comply with Section 15(2) of part 5 of the Neighbourhood Planning Regulations 2012.



## APPENDIX A – WNP Review Community Engagement Strategy

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A.1	Introduction
A.2	Why do we need a Community Engagement Strategy?
A.3	Who is to be consulted?
A.4	Guiding our Community Engagement approach – the ‘local’ dimension
A.5	Guiding our Community Engagement approach – the regional approach
A.6	Guiding our Community Engagement approach – the national approach
A.7	How will we consult?

The Wallingford Neighbourhood Plan 2021 (WNP) is a community-led planning document, written by a Working Group of local residents together with members of Wallingford Town Council. Neighbourhood Plans are part of the Government's approach, introduced in the Localism Act 2011 giving local people a greater say in the future of their community.

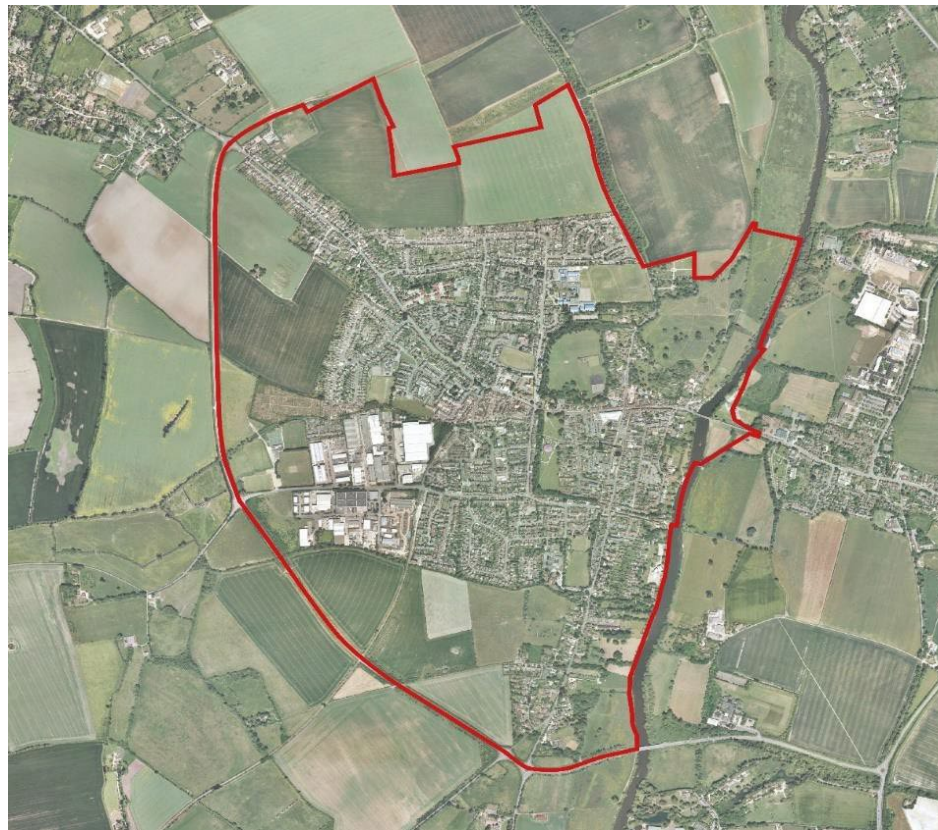
The WNP Review document will provide a planning tool to guide the long-term future of the Town and its countryside for the period from 2024 - 2035. The Plan contains a vision for the area and sets out planning policies to achieve this. In our view, the WNP 2021 is a made Plan that represents a strong and robust approach to the Localism agenda. Within this context it helps deliver the South Oxfordshire Local Plan 2035. The Review Plan will continue to deliver SOLP 2035 for the Wallingford area.

The WNP 2021 and the Review Plan contain a vision for the town and set out objectives and planning policies to achieve this. Within this context it is designed to sit as part of the Local Development Plan.

Wallingford was formally designated as a Neighbourhood Plan Area on 1st May 2015 under Section 61G of the Town and Country Planning Act 1990 as amended by the Localism Act with Wallingford Town Council being the qualifying body.

The Plan area is set out in Map 1 and covers the main town and surrounding land up to the adjacent parishes of Brightwell-cum-Sotwell, Cholsey and Crowmarsh Gifford.

*Map 1 Boundary map of Wallingford Neighbourhood Plan boundary*



Community engagement is seen as a bedrock of Neighbourhood Planning, as it serves to embed local interest and reality into Plans. This principle has been accepted from the start by Wallingford. In this Community Engagement Strategy, 'Public Engagement' and 'Consultation' are used interchangeably.

### **A.1 Why do we need a Community Engagement Strategy?**

The intent of the Localism Act is as the title implies to put planning decisions more on a local basis. Without this local focus issues important to Wallingford residents and business operators could be lost. By having an accepted ('made') Neighbourhood Plan, Wallingford's development aspirations within it become integrated into the South Oxfordshire Local Development Plan; what is important to local residents becomes part of the legal planning process.

By having a Strategy, it means we must have considered how we are going to engage with local people and what we were going to engage them on. The next step is then to consider the 'how' - how we are going to achieve engagement – and with whom and when, and who would do it.

### **A.2 Who is to be consulted?**

For this Review of the WNP 2021, Wallingford Town Council endeavoured to reach all Wallingford residents, people who visit and work in Wallingford, community organisations and local businesses in addition to statutory consultees. They were invited to contribute to the Public Engagement, and the Regulation 14 public consultation processes.

### **A.3 Guiding our Community Engagement approach – the 'local' dimension**

Wallingford Town Council is formally the 'qualifying body' for the Wallingford Neighbourhood Plan. That is, it has overall management responsibility for the Neighbourhood Plan, although not sole decision-making authority. It follows that town councillors, as representatives of the local community, should be part of the Working Group tasked with developing and having implemented the Wallingford Neighbourhood Plan.

Remembering the 'local' aspect of the Localism Act it is also necessary that members of the wider local community should be part of the

Working Group, to ensure that the community is truly represented. These include residents who moved to Wallingford since 2020, one of whom lives on the new Highcroft development and is chair of the residents' association. Another Working Group member who moved to Wallingford in 2020, set up a branch of Living Streets, a national organisation representing pedestrians with a mission: To achieve a better walking environment and inspire people to walk more. One member represented a voluntary group providing sport in the town. We also had specialists in the natural environment and heritage.

The Working Group welcomed engagement from members of Wallingford's community via the Public Engagement and Regulation 14 public consultation stages. Where feasible, comments and suggestions were incorporated within the Review of the WNP 2021.

#### **A.4 Guiding our Community Engagement approach – the regional approach**

Wallingford does not exist in a vacuum. It is affected by and is in its turn affecting those areas directly on its borders – the parish councils and National Landscapes. Landowners with landholdings within the town area and whose willingness or otherwise to make land available for development will have a major impact on the development of the Neighbourhood Plan, are a group that it is important to consult with.

Above all these different groups of entities there is the Local Planning Authority, which for Wallingford is South Oxfordshire District Council. The Council has a legal obligation to assist in the development of Neighbourhood Plans and it is therefore important that both informal and formal use is made of their expertise. Oxfordshire County Council which has responsibilities covering Active Travel, minerals and waste, education provision and transport systems, are another important 'consultee'.

#### **A.5 Guiding our Community Engagement approach – the national approach**

There are a number of organisations, most have a national remit, whose interests could be affected by development proposed by the Neighbourhood Plan. These organisations are known as statutory consultees, and include:

- The Environment Agency;
- Historic England;
- Natural England; and
- Oxfordshire County Council (also included under regional)

#### **A.6 How will we consult?**

Wallingford Town Council publicised the Public Engagement and Regulation 14 consultation processes on its website, newsletter and social media, at community engagement events that the council hosted, in articles in Window in Wallingford magazine, in posters on noticeboards, and via articles in the Wallingford Herald newspaper.

The list of statutory consultees supplied by South Oxfordshire District Council was augmented by consultees suggested by members of the Working Group, these included the Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board, Oxfordshire Local Nature Partnership, and Oxford Diocesan Schools Trust.

Total of 53 community-based organisations including schools, churches, groups representing disabled people were invited to take part in the Regulation 14 consultation. All shops and businesses in Wallingford were invited to take part in the Regulation 14 consultation. A Full list of Regulation 14 consultees in **Appendix C**.

## APPENDIX B – Public Engagement

Submissions to the Public Engagement process 22 Sept 2023 to 6 Nov 2023. People were invited to respond to three questions:

- which policies would you change and why
- which policies are no longer required
- what policies would you like to see in the revised Wallingford Neighbourhood Plan and why

Submissions received online from 14 people. One email report received from Boyer Planning on behalf of Croudace Homes.

Submission via online form: which policies would you change and why	WNP Working Group response	Change to WNP
1. Change Map 3 in WNP. The Map came from SODC and it shows a yellow/green shaded area which does not define the built up area of the Town. Delete Map as it is misleading	Map 3 shows the sites that were assessed for new housing by SODC in 2011. It is relevant to change the title of the plan and key to indicate that WTC assessed the same sites for its site assessment for the neighbourhood plan. The yellow/green area was not assessed. The plan does not aim to show a built up area boundary,	Change Map Title to Sites assessed for housing and other uses in the preparation of the neighbourhood plan.  <b>Subsequent to this, the Working Group decided to produce a new Map 3: Built-up Area Boundary Map linked to Policy WS3 Development within the Built-up Area</b>
2. None, this plan is detailed and gives good opportunity to block as much as possible.	Noted.	No action
3. Housing	Noted	No action
4. Town centre	Noted	No action
5. None	Noted	No action
6. I'd like the Regal to be turned into a space where we can have classical concerts as there is nothing like that in Wallingford. I'd also like there to be more small business spaces between 500-1000 sq ft as most spaces are unaffordable for small businesses	Noted Classical music concerts are sometimes held in local churches. The town council will consider local views in their development of proposals for the Regal site.	
7. WS3.1(c) needs to be expanded to specifically mention the need to protect town centre facilities from potential noise complaints from residents moving into newly built/converted	Paragraph 2.4.30 specifically seeks to do this.	

properties. The town centre - in particular the night time economy - is vital to building Wallingford into a vibrant and thriving market town which would attract people in to use the restaurants, pubs and the Corn Exchange cinema and theatre. I would like to see the Neighbourhood plan making it clear that the Council is cognisant of noise generated by these businesses and that it recognises the importance of enabling the businesses to maintain their operations and grow in the future. I feel that this should also be reflected in section 7 TC2: enabling developers to use upper floors for residential use could impact adversely on next door businesses that generate noise at night. Noise complaints from residents can easily curtail the activities of night time entertainment venues		
8. Health centre provision - make reference to community hospital. Reference ICS strategies including community strategy.* Reference Health Impact Assessments on Healthy Place Shaping and planning pages of Oxon CC. Visitor accommodation - should include accessibility to travel via public transport if possible or policies which support easy transport from Didcot or Cholsey.	Noted Policies are supportive of public transport, walking and cycling.	
9. Policy WS3 could be improved by including a clause about improving disabled access when developing in built up areas. Policy HD3 could be improved with a clause about accessible housing (this is in short supply nationally). Either policy EV1 or 2 should include a clause about ensuring green spaces are accessible for all. Policy TC2 concerns use of the first floor of buildings for employment use. This could potentially exclude disabled customers and employees. Policy TC4 should include specific reference to making tourism facilities accessible as this will attract more people to visit.	Noted. Chapters 5 and 8 refer to the need for green spaces and facilities to be accessible for all.  Noted comment re: housing for disabled people. Waiting for SODC review of housing for elderly and disabled.	Provision is made in Policy WS2 for further housing for the elderly and disabled if the SODC study identifies this is needed.
10. Mc5, cf2	Noted. Policy MC5: Vehicle parking. Policy CF2: Support for New Formal and Informal Sport and Community Facilities	The policies will be reviewed by the Working Group
11. Sports and leisure province. For the last 20 years the Boys Brigade in Wallingford have provided both young people and	Agreed.	Ch 10, supports public access to the river

others the opportunity to enjoy the local river in a safe and environmentally friendly way. This has included safety training and as a result 5 rescues have been made over this time. This has all been achieved without a base causing craft and support equipment to be transported to the Riverside. Should a suitable site become available we would ask that consideration be given to making it available for the provision of a proper facility.		
12. 20 mph Speed limits. These are part of a National Socialist Party (NAZI) agenda to control everything. The government are worried about the rise of NAZI policies and so should any reasonably responsible person All such policies should be scrapped and the people sponsersing them removed from office!	Noted. 20mph speed limit already in WNP 2021.	No action
13. Coach parking - not seen this policy work to allow this. Note problems for the Bunkline to try and get land for coaches to be used for the Polar Express.	Noted	Consider removing this policy
14. Car parking - Consider seeing less of it by improving public transport and encouraging use of smaller vehicles - eg larger vehicles have to park further away (disability excluded). Older people do not need to drive large combustion vehicles into the centre of the town. Consider Electric scooters etc. Improve footpaths/cycle paths to allow their use.	Noted The plan aims to supports better provision for public transport, walking and cycling.	Car parking to be considered in review
15. Connectivity - should be more than just cycle parking. Needs to include the cycle paths and design to allow cycles and pedestrians to get easily between parts of wallingford. Especially to Cholsey train station. Consider role of Electric Bikes and also on demand public transport to train stations or community car clubs.		Cycling to be considered in review
16. Add climate adaptation to climate change. Consider how to manage heat waves through green/cool spaces. SO is ageing populaiton and more at risk of high temperatures in buildings. Link to river space to stay cool. Accessible to ages and disabilities. EV1 to make reference to blue spaces. Esp with the gravel works going on around the edge and what opportunities they provide	Noted. Gravel works are outside the NP area.	Climate adaptation measures to be considered in review
<b>Submission via online form, response to question: which policies are no longer required</b>	<b>WNP Working Group response</b>	<b>Change to WNP</b>



17. Transport	Noted	
18. MC7, MC3, MC4, EE1	Noted	Consider when reviewing Ch 8
19. All policies are needed but some now need updating	Noted	
20. I do not believe that anything should now be removed from the Plan.	Noted	
21. You may want stronger line on air pollution. Check with SODC air quality officers their plans for the AQMA in the latest 5 year Action Plan...	Noted The AQMA was removed from Wallingford by SODC as air quality has improved.	
22. The part of CF6 which refers to the extension of the GP surgery may no longer be needed as a new GP surgery in a different location is now proposed.	Noted	Policy WS2.2 makes provision for a new medical centre for GPs.
<b>Submission via online form response to question: what policies would you like to see in the revised Wallingford Neighbourhood Plan and why?</b>	<b>WNP Working Group response</b>	<b>Change to WNP</b>
23. Transport links	Noted	Consider making changes in review
24. TC3 because progress is slow and nothing appears to be happening.	Agreed, waiting for working group to respond to TC	A new policy for the Regal is included.
25. Retain Policy TC 3 REGARDING THE REGAL BEING A COMMUNITY ASSET. EVEN IF BUILDING IS NOT KEPT THE TOWN COUNCIL SHOULD NOT SELL THE SITE TO DEVELOPERS	Agreed, waiting for working group to respond to TC	
26. A tree (or trees) in the MIDDLE of the town centre please, so it looks less barren. If tree roots are a potential problem, the trees can be tubbed and watered by maintenance contract	Noted This is not a matter for the neighbourhood plan .	
27. Chapter 7: Town Centre. I've heard several councillors talk about pedestrianising the town centre (buses exempt, and it would need to be paired with attractive parking). I support the idea, i've anecdotally found it popular with others, and wonder if we couldn't at least mention the possibility in the local plan.	Noted. Already in WNP 2021 Ch 10 .	
28. Possibly a new traffic plan so more of the town centre can be pedestrianised, reduced rates for independent shops and an arts festival every year		
29. Anti-social behaviour, including parking and speeding	Noted. This is not a matter for the neighbourhood plan.	

<p>30. A more expanded policy for GP healthcare setting out specific numbers for local population and the number of GPs required to care for them (e.g. for every 1,000 population we must have provision for (1, 2?) GPs. I would also like to see greater emphasis put on the need for developers to actively engage in improvements to sewage infrastructure and management of water run-off.</p>	<p>Noted. Where required developers are required to fund sewage improvements</p>	<p>Provision for a new medical centre is included in new policy WS2.2.</p>
<p>31. Reference check against draft Health and Wellbeing Strategy for Oxfordshire. And healthy place shaping approach. * Highlight role for blue spaces (water) * Consider the "beauty" principle in design of new developments - <a href="https://www.gov.uk/government/groups/building-better-building-beautiful-commission">https://www.gov.uk/government/groups/building-better-building-beautiful-commission</a> *</p>	<p>Noted. The importance of the river for leisure activities is highlighted in the plan.</p>	
<p><b>Report From Boyer Planning of behalf of Croudace for residential development on Site A2. Received by email 6 November 2023. Summary copied below</b></p>	<p><b>WNP Working Group response</b></p>	<p><b>Change to WNP</b></p>
<p>32. Croudace welcomes the review of the Wallingford Neighbourhood Plan. We recognise that neighbourhood planning can allow local communities and stakeholders, of which we are a part, to play a meaningful and positive role in influencing development areas. 5.2 As we have set out in these representations, there are many aspects of the adopted Wallingford Neighbourhood Plan that are positive, and which should be carried forward. However, we consider that an allocation for residential-led development at the Land West of Shillingford Road (Site A2) should be included, to ensure that the reviewed plan complies with the basic conditions and could be adopted. 5.3 Croudace recommend that the review of the Neighbourhood Plan should continue to enshrine a positive approach toward development related to meeting the identified housing needs of Wallingford Market Town and South Oxfordshire District more generally, by providing an allocation for development at Site A2. 5.4 As part of this review, Croudace also recommends that amendments are made to specific policies within the plan to ensure a more positive approach toward the development of Specialist Accommodation of Older People and</p>	<p>Noted. Site A was rejected when the Site Assessments and Site Allocations were completed during the preparation of the WNP 2021.</p> <p>The WNP meets the housing requirements for Wallingford as set out in the SOLP 2035. There is no housing need to be met through the development of any part of Site A. In 2024 SODC are undertaking a review of housing needs which will include housing for older and disabled people. Planning permission already exists for further housing for older people on site E.</p>	<p><b>Chapter 2 new text</b></p> <p><b>2.4.4 : The Local Plan 2035 in Table 4d identifies the need for 3,873 new homes to be built in the market towns (Henley, Thame and Wallingford) and indicates that existing commitments at Wallingford are more than sufficient to meet the requirements for the WNP. There is no outstanding requirement to be met.</b></p> <p><b>2.4.5 : The WNP is in general conformity with the Development Plan. The Local Plan 2035 more than meets the level of growth identified for the district in the Oxfordshire SHMA.</b></p>

<p>Community Facilities. 5.5 To this end, we recommend that the supporting evidence-base is updated as part of the review proves, to assess the extent of need for Specialist Accommodation of Older People in Wallingford and to provide positively worded policies to allow this specialist form of development to come forward as required. 5.6 Furthermore, we would welcome positively worded policy to support the development of new community facilities to serve the community at Wallingford, which could be delivered as part of a new neighbourhood at Site A. Engagement with the NPSG and WTC would be welcomed to inform Croudace's vision for the site in this regard, to develop our understanding of the types of local facilities that are required by the community. 5.7 These representations have confirmed that the Land West of Shillingford Road (Site A2) is free from any significant constraints that would inhibit the development of the site for up to 950 new homes, a new local centre (potentially including community facilities), a 2FE Primary (or SEND) School, potential Specialist Accommodation for Older People, a new Country Park, and associated infrastructure. 5.8 To ensure the Neighbourhood Plan is capable of affecting the development of the site as it progresses through the emerging JLP plan-making process, it is recommended that the site is allocated to assist in meeting the identified housing needs of the District. 5.9 Furthermore, we would welcome the opportunity to discuss the allocation of a smaller parcel of land within Site A2 as part of an initial phase of the development of the wider site. We consider that approximately 150 new homes could be delivered to assist in meeting the District's housing needs in the short-term. Document No. IMS-F-18, Revision 1, 01.05.2018 Page 21 of 29 5.10 Croudace would welcome the opportunity to clarify any of the matters raised in these representations with the NPSG should this be required or provide further information if it would be useful. We would also welcome the opportunity to engage with the NPSG and WTC with respect to the vision for development at the site moving forward.</p>		
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## Appendix C – Regulation 14 Consultees

	Statutory consultation bodies	Organisation
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Oxfordshire County Council
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Oxfordshire County Council
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	South Oxfordshire District Council Vale of White Horse District Council
(b)	a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	Brightwell-cum-Sotwell Parish Council Benson Parish Council Cholsey Parish Council Crowmarsh Parish Council
(c)	the Coal Authority;	The Coal Authority
(d)	the Homes and Communities Agency;	Homes England
(e)	Natural England;	Natural England
(f)	the Environment Agency;	Environment Agency
(g)	the Historic Buildings and Monuments Commission for England	Historic England
(h)	Network Rail Infrastructure Limited (company number 2904587);	Network Rail
(h)	Network Rail Infrastructure Limited (company number 2904587);	Network Rail
(i)	a strategic highways company - any part of whose area is in or adjoins the neighbourhood area; (ia) where the Secretary of State is the highway authority for any road in the area of a local planning authority any part of whose area is in or adjoins the neighbourhood area, the Secretary of State for Transport;	Highways England
(j)	the Marine Management Organisation(6);	Marine Management Organisation
(k)	any person -	
(i)	to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and	BT

(ii)	who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	EE
(ii)	who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	Three
(ii)	who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	EMF Enquiries - Vodafone & O2
(l)	where it exercises functions in any part of the neighbourhood area —	
(i)	a clinical commissioning group established under section 14D of the National Health Service Act 2006;	Oxfordshire Clinical Commissioning Group
(i)	an integrated care board established under Chapter A3 of part 2 of the National Service Act 2006;	BOB Integrated Care Board
(ia)	NHS England;	NHS England
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	Wood Plc (on behalf of National Grid)
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	National Grid
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	Cadent
(ii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	Scottish and Southern Energy Power
(iii)	a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989;	UK Power Networks
(iv)	a sewerage undertaker; and (v)a water undertaker;	Thames Water - Developer Services
(m)	Organisations focussing on the natural environment	
(i)	county-wide natural environment partnership leading on creating Nature Recovery Networks Partner in OLNP	Oxfordshire Local Nature Partnership Wild Oxfordshire
(ii)	Nature recovery project across Oxfordshire	Nature Recovery at Community Action Groups Oxfordshire
(iii)	environmental flood alleviation project covering Wallingford	Thames Valley Flood Scheme, project with the EA
(n)	voluntary bodies, charities, community groups including churches, schools some or all of whose activities benefit all or any part of the neighbourhood area;	Wallingford Peace Group Wallingford and Didcot Rotary Club 1155 Club Royal British Legion (Wallingford) Wallingford Masonic Centre Ltd Fire Station St. Mary-le-More Church

	<p> Wallingford Library  Wallingford Museum  The Window on Wallingford (Magazine)  Wallingford Emergency Food Bank  Wigod Way Family Centre  Ramblers Association (Didcot and Wallingford)  Sustainable Wallingford  Wallingford Castle Meadows and Riverside Meadows  District Commissioner for Guides  District Commissioner for Scouts  Boys Brigade 1st Wallingford  Army Cadet Force (Wallingford Detachment ACF)  Royal Air Force Training Corps (Cadets)  The Old Counting House  Didcot and Wallingford Youth Orchestra  Wallingford Tuneless Choir  Wallingford Bridge Club  Cholsey &amp; Wallingford Railway  Kinecroft Academy of Ballet  Wallingford Accessible Boat Club  Wallingford and District Art Club  Wallingford Allotments and Gardens  Wallingford Dog Training Club  Fir Tree junior School  Paddocks Pre School  Rainbow Pre School  St. John's Primary School  St. Nicholas Church of England Infants School  Wallingford School (Secondary)  AFC Wallingford (Football)  Crowmarsh Youth Club  Run Wallingford (Running Group)  Hithercroft Squash Club  Wallingford Table Tennis Club  Wallingford Leisure Centre  Wallingford Badminton Club  Wallingford Rowing Club  Wallingford Sports Park  The Corn Exchange  Sinodun Players  The Earth Trust  Talking Newspaper (Wallingford and District)  Wallingford Volunteer Drivers  Wallingford Club (Adults with learning difficulties social)  Wallingford and District Stroke Club </p>
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		MIGWAL (Mobility Issues Group) Young at Heart Club
(n)	bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;	<i>No known group in the WNP area</i>
(o)	bodies which represent the interests of different religious groups in the neighbourhood area;	St Mary-le-More St Mary Magdalene (Crowmarsh) The Religious Society of Friends (Quakers) The Ridgeway Community Church Wallingford Baptist Church Wallingford Methodist Church
(p)	bodies which represent the interests of persons carrying on business in the neighbourhood area; and	<i>(see t below)</i>
(q)	bodies which represent the interests of disabled persons in the neighbourhood area.	MIGWAL (Mobility Issues Group) Wallingford & District Talking Newspaper Young At Heart Wallingford and District Stroke Club Wallingford Club (Adults with Learning Difficulties) The Wallingford Accessible Boat Club
(r)	Land owners / Developer's Representatives	St Joseph Homes, Berkeley Group St Edward Homes, Berkeley Group Boyer Planning on behalf of Croudace David Wilson Homes Southern Counties
(s)	Additional bodies	Wallingford Medical Practice
(t)	Shops and businesses in Wallingford	Aspa Pettit's Womens Pettit's Mens Village Fabrics Louise Claire Millinery Wildwood Rides on Air Spin & Sparkle Illumination Grape Minds Wallingford Bookshop Hornsby Dunmore Brooker & Breeze Walters Violins Wallingford Arcade Champions Runwize House of Cards Corn Exchange KP Stationers

	<p> Cook House Deli  Mercy In Action  Wallingford Radio  George Hotel  Centre 70  Flowerbox  Jim Beans  Wallingford Sports Park  Slade Legal  Chancellors  JP Knight  Homebase  In House  Allen &amp; Harris  Winterbrook  Thomas Merrifield  Wallingford Library  A Steap Ahead  Mems Barber  Indigo Rye  Essence Beauty  Route 51  Wallingford Thai Spa  Wallingford Tea &amp; Coffee Shop  Mike Ottery Antiques  Ayres House Studio  Judy Dewey  Triangle Travel  Wallingford Museum  More Than Images  Help I've Broken It  The Shack  Five Little Pigs  Coachmakers Arms  Cross Keys  Town Arms  The Royal  Posh Nosh  Le Clos  Old Post Office  Bean and Brew  Mollies  The Dolphin  Shellfish Cow  Oxfam Books  Help I've Broken It </p>
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	Wallingford Olde Sweet Shop Soph's Loafs
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## Appendix D – Regulation 14 Comments and Responses

### Contents

**Page 25. Table 1: Submissions from the public consultation 3 February – 6 April received by email and written responses; includes residents, representatives of local organisations, the medical practice and Cholsey Parish Council**

**Page 57. Table 2: Submissions from statutory bodies: Oxfordshire County Council and South Oxfordshire District Council**

**Page 79. Table 3: Submissions from statutory bodies: Thames Water, Historic England, Natural England, ONR, Berkeley Homes (Oxford & Chiltern) Limited, L&Q Estates, Boyer Planning on behalf of Croudace, Nicholas King Homes, David Wilson Homes**

**Table 1: Submissions from the public consultation 3 February – 6 April received by email and written responses**

Ref	Comment	Public hearing?	Working Group comments	Changes to the WNP
1	I am concerned about the environment effect of so many new developments, e.g. the increased levels of flooding. I note the concern behind the plan for health and well being and yet it is very difficult to get a doctor's appointment and Boots pharmacy was actually closed today (3/2/2024). This is actually a risk to health and well being. I also wonder what percentage of the new builds have been bought by local people.	Yes	Noted. There are two sites with planning permission for new housing, one of which site E (Winterbrook Meadows) was allocated in the made Wallingford Neighbourhood Plan.	No change
2	Sadly, I cannot attend the consultation days concerning the Wallingford Neighbourhood plan as I will be away but I do wish to make a strong representation on behalf of Cholsey and Wallingford Railway. 1. Very little is made of this asset in the report. Whilst acknowledging that Wallingford has a wonderful archaeological history, how many visitors are attracted annually to the Castle and other historic features? The railway	No	Noted. Michael Palfrey, chair of C&W Railway attended public consultation event on 23 Feb. He agreed to research and provide additional information about the amount of land to be	<b>New photo</b> of the Bunk Line to replace old photo in Ch 7. <b>New text 7.6 (vii) The Cholsey &amp; Wallingford Railway, known as the Bunk Line, and its Preservation Society, provide an asset of significant historic and heritage value to the town. More than 35,000 people visited the Bunk Line in</b>

	<p>had over 35,000 visitors in 2022. Estimates based upon the House of Lords 2013 report suggest that this would have attracted over £250,000 to the local economy. Would the museum have provided as much recognition and income to the local economy? The railway itself is an historical asset, it should be recognised as such and dealt with as part of the towns history as well as an important tourist attraction.</p> <p>2. In previous plans it was recognised that the railway has a huge potential to attract further visitors. Much has been achieved since the 2021 Plan. The addition of the Maidenhead Canopy, constructed in 1871, has won two National awards and, with successful grant applications, attracted over £750,000 in funding.</p> <p>3. Planning permission has been granted to move the listed Stoke Canon signal box to Wallingford to both protect a listed building and enhance the visitor attraction at the station.</p> <p>4. The original plan identified and protected a strip of land 10m wide (originally 20m) to the east from Bradfords Brook to the bypass. Is this still retained? It is needed for the growth of the railway and to provide facilities away from planned housing for maintenance and storage of rolling stock.</p> <p>5. This year we will, hopefully, embark on a feasibility study to run a midweek 'shoppers' train once a week, using a heritage diesel, from Cholsey to Wallingford. This would primarily, but not uniquely, be for those without transport to shop at Lidl. If possible we will make it into a community or social event for the elderly of Cholsey too by providing (with Lidl support) tea and cake at the Station.</p> <p>I strongly recommend that the material relating to the railway, its history and its potential, needs enlarging considerably in this Plan.</p>		<p>safeguarded, and the possibility/feasibility of a commuter service in future.</p>	<p><b>2022. This heritage railway has open days and weekends throughout the year for steam and diesel trains connecting with mainline services at Cholsey station. It attracts visitors to Wallingford and provides an economic value to local businesses.</b></p> <p><b>New text: 8.3.16 The railway bed is owned by Wallingford Town Council and leased by the Cholsey and Wallingford Railway Preservation Society (CWRPS). The Society believes that if the railway line is upgraded to national standards this would allow for a weekday commuter railway to GWR mainline at Cholsey, whilst maintaining the existing heritage railway operation. The Town Council would support this proposal which would enable future promotion of sustainable travel.</b></p> <p><b>New text</b>  <b>10.1.21 The Cholsey and Wallingford Railway line to be upgraded to national standards to allow for a weekday commuter railway whilst maintaining the existing heritage railway operation.</b></p>
<p><b>3.</b></p>	<p>With an aging population, and with a typically aged visitor population, I think Wallingford needs to increase the availability of public toilets in and around the market place. The one opposite the entrance to the Bullcroft can be seen as intimidating, whereas the ones in the public car park are some</p>	<p>no</p>	<p>Noted. SODC is responsible for the provision of public toilets in the town. Cholsey &amp; Wallingford Railway is upgrading its public facilities</p>	<p>no change</p>

	distance away. Also new toilets should be build near any coach station that is build to welcome visitors and at Wallingford Railway station as well.			
4.	<b>From OX10 Community</b> Public hearing	Yes	Noted	No change
5.	It was good to see green spaces clearly identified. Appropriate access to these would be good eg. permanent pedestrian gate on road next to play group to access field near medical practice. What would also be good is to ensure new housing always meets high energy standards when they are built e.g. with extremely low wall, window and roof heat loss. So as to avoid future retrofit.	no	Noted The field near the medical practice is owned by the NHS, which has not engaged with the WNP process.  All new houses are built in accordance with the current Building Regulations. Standards are improving all the time.	Map 7 has been changed to be clear that not all green spaces have public access.
6.	Reference: Chapter Two Strategy for Wallingford Policy WS2 The land allocation for housing in Wallingford. Addition to this policy to allocate land on Site E (Winterbrook Meadows) for a medical centre, and the precise nature of the care facility.  Wallingford plainly needs more GP provision.  It is not sensible to site a single medical centre on the periphery of the town where access will be extremely difficult for the overwhelming majority of the population who live a substantial distance away. This would inevitably result in many more car journeys, as many patients would need to travel substantial distances by car due to infirmity or illness, so creating massive car parking problems in all the residential roads within the vicinity of the proposed medical facility.  It would be much more sensible to retain the current, modern, purpose built facility near the hospital and build a SECOND medical centre on a site that would serve people living on	yes	Noted. The GPs in the medical practice carried out extensive research to find a suitable site for their new medical centre. The GPs and Integrated Care Board do not believe that a split site is an appropriate solution for health care services in Wallingford. We are recommending the allocation on Site E Winterbrook Meadows based on the evidence of need, suitability of the site and availability. Access by foot and cycle will be possible from new links to residential areas	<b>Dr Simon Morris from the medical practice submitted a Relocation Rationale which is Appendix G to the WNP Review.</b> <b>Chapter 2</b> <b>New text Policy WS2.2</b> <b>The 2.2ha of land previously identified for a school on Site E is allocated for a medical centre, with the possibility of some housing, which should ensure that specialist housing needs for older and disabled people locally have been met.</b> <b>Any proposals for the site should:</b> <ul style="list-style-type: none"> <li>• Set out the rationale for the size and design of the proposed medical centre demonstrating how long term needs have been considered</li> <li>• Provide adequate vehicle and cycle parking for staff and patients</li> <li>• Ensure that access to the site encourages both walking and cycling</li> <li>• Demonstrate the viability of the medical centre and the scale of housing proposed.</li> </ul>

	<p>other side of town. This would be more easily accessible to local residents on foot, bike or public transport.</p> <p>Both medical centres could be run as one single practice in order to meet the needs of economy of scale.</p> <p>I am sure the people of Wallingford would prefer a SECOND medical centre sited in another part of the town, rather than a single facility sited on the periphery, as in the current Wallingford Neighbourhood Plan Review. This is an important issue with far reaching implications for residents.</p>			<p><b>New text:</b></p> <p><b>2.6.2 The land allocated for a school is no longer required for that purpose, and Policy WS2.2 now allocates that site for a medical centre. During spring 2024, GPs from Wallingford Medical Practice are working with Berkeley Homes to prepare a joint planning application for the site.</b></p> <p><b>2.6.3 It is essential that the design of the new medical centre is sufficient to meet the long-term needs of the local area. The design should allow space for a hub facility for the delivery of medical and health services for people in this part of South Oxfordshire and for possible expansion to meet longer term needs.</b></p> <p><b>2.6.4 The Wallingford Medical Practice is a hub facility with doctor and nurse practitioners, and related community medical services and primary care providing for both Wallingford and many surrounding villages. The current medical centre is at capacity, and the GPs say they will be unable to meet the medical needs of the committed new homes in Wallingford and surrounding areas on their existing site. There is a clear and urgent need for the medical practice to expand with space for more consulting rooms and for supporting services. ‘Relocation Rationale’ provided by the GPs giving justification and rationale for the relocation is attached at Appendix G.</b></p> <p><b>2.6.5 The growing population within the catchment is leading to increased pressure on existing health facilities. The practice is already 32% undersize compared to NHS space criteria, 46% undersize compared to space criteria for the new NHS structure, and 59% undersize when known future housing development is accounted</b></p>
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				<b>for. Plans include a future patient capacity of 22,500, which will only just meet the planned population growth within the catchment.</b>
<b>7.</b>	<p>1. Parks, play equipment and public spaces for older children and teenagers are currently designed for the default male. It's time to make space for girls. Most councils have spent more time and money on facilities for dog waste than they have for teenage girls. An organisation called 'Make Space for Girls' has some great resources compiling findings and actions taken by councils across the world and what has been learnt from the process of consulting with local girls and designers so far. Please ensure this is addressed in the approach proposed for these aspect areas in the Neighbourhood Plan via policy wording, local engagement and action.</p> <p>2. Wallingford needs a skate park (in the Bullcroft) for use by all ages with clearly defined areas for different needs and uses. This means a skate park similar to Cholsey's for skateboards and scooters, pump track (examples at Upton and Kennington playparks) for BMX etc and a cycle park similar to Faringdon Cycle Park at Folly Park, Stanford Road, SN7 7AQ for those learning to cycle on the road network safely.</p> <p>3. Wallingford needs a Community and Arts Centre with space for all ages serving food and acting as a hub for creativity and community cohesion. The old Barclays building would be an excellent choice as an extension to the Corn Exchange next door. For inspiration see what a Community Group has done and is doing in Watchet - East Quay, Watchet contains a gallery, artist studios, education space, restaurant, accommodation pods set on the harbourside in Watchet, West Somerset.</p>	no	<p>Noted</p> <p>1. Wallingford Town Council supports new project with Didcot TRAIN</p> <p>2. We recognise the need for teenagers and young people to use a skate park. WTC would support a skate park with facilities for bicycles/wheeled sports on a suitable site.</p> <p>3. The former Barclays Bank building is occupied. There are several organisations with premises in Wallingford offering community-focused activities to people of all ages.</p> <p>4 We have looked at the information published by Make Space for Girls and will seek to use it where new facilities are proposed.</p>	<p><b>Addition of wheeled sports in 10.1.22 in Chapter 10.</b></p> <p>10.1.22 The Town Council will explore with SODC the opportunity for providing an all year-round pool, a pay and play gym, a skate park <b>and park for wheeled sports</b>, and a 4-court sports hall in full time community use in the Wallingford area. Proposals to secure the provision of a covered swimming pool for all year use in Wallingford or within walking distance (1.6 km) of Wallingford Town Centre will be strongly supported.</p>
<b>8.</b>	<p>1. Parks, play equipment and public spaces for older children and teenagers are currently designed for the default male. It's time to make space for girls. Most councils have spent more time and money on facilities for dog waste than they have for teenage girls. An organisation called 'Make Space for Girls' has some great resources compiling findings and actions taken by councils across the world and what has been learnt from the</p>	yes		

	<p>process of consulting with local girls and designers so far. Please ensure this is addressed in the approach proposed for these aspect areas in the Neighbourhood Plan via policy wording, local engagement and action.</p> <p>2. Wallingford needs a skate park (in the Bullcroft) for use by all ages with clearly defined areas for different needs and uses. This means a skate park similar to Cholsey's for skateboards and scooters, pump track (examples at Upton and Kennington playparks) for BMX etc and a cycle park similar to Faringdon Cycle Park at Folly Park, Stanford Road, SN7 7AQ for those learning to cycle on the road network safely.</p> <p>3. Wallingford needs a Community and Arts Centre with space for all ages serving food and acting as a hub for creativity and community cohesion. The old Barclays building would be an excellent choice as an extension to the Corn Exchange next door. For inspiration see what a Community Group has done and is doing in Watchet - East Quay, Watchet contains a gallery, artist studios, education space, restaurant, accommodation pods set on the harbourside in Watchet, West Somerset.</p>			
9.	<p>Young People: Absolutely key for growing Wallingford is the provision of services for young people. Currently Wallingford has meagre play parks aimed at toddlers, with nothing in the way of parks, play equipment or public space for older children, teenages and importantly girls. Services in Wallingford for sport are excellent, but come at a cost that not all parents can afford and are not suited to all children - teenage girls being particularly impacted in this area. An organisation called 'Make Space for Girls' has some great resources compiling findings and actions taken by councils across the world and what has been learnt from the process of consulting with local girls and designers so far. Skate parks: While many residents dislike skate parks, or in fact anything that may appeal to teenagers, who are often unfairly vilified, a</p>	yes	<p>Noted. New facilities for children and young people will be provided on Highcroft, Winterbrook Meadows and on the Bull Croft subject to planning permission</p> <p>Youth groups e.g. Scouts, Guides, Brownies, Boys Brigade have equipped premises in Wallingford. Churches' youth groups are also catered for.</p> <p>Wallingford School has youth-based facilities available to</p>	<p><b>New text added in Chapter 9.</b> <b>9.2.16 The provision for children's play is currently poor, with just one dated Neighbourhood Area Equipped for Play (NEAP) on the Bull Croft, which is being replaced, subject to planning permission, and a small Local Area for Play (LAP) on the development at Portcullis Drive. In 2023 the Town Council submitted a planning application for a new scheme on the Bull Croft, which is being considered by SODC. This will deliver improved youth football pitches and a new pavilion, with disabled toilet, and an adult functional fitness scheme. The new NEAP for 3 to 16 year olds has been designed to be inclusive and girl-friendly, and to incorporate disabled provision, including wheelchair ramps in some of</b></p>

<p>park of this nature does provide a much needed focus. This should not be overlooked, gathering young people together is not a bad thing - too often parks are pushed away from residents into dark park corners with predictable consequences. The skate type parks should be central to the community where they're easily observed and allow for an element of self control.</p> <p>However skatepark design is nuanced and a lot of thought has to go into appropriate design to allow skaters, scooters and bikers to co-exist across all ages. While a skate park should not be the sole domain of teenage boys, it also shouldn't be used by parents of toddlers as a creche facility. A 3yr old on a scooter, teenage BMXer and even adult skateboarders need to be equally considered in design to ensure safe and fair use. Simply ticking the box with a generic skatepark is a quick, albeit expensive win, but will backfire.</p> <p>The focus should heavily be on consultation and design, rather than the build cost.</p> <p><b>Biking:</b></p> <p>Wallingford has a rich tradition of cycling with many young people actively engaged. Currently provision for such services is very limited. Larger bikes don't mix well with skate parks, and subsequently local riders have made their own jumps and tracks in various areas around wallingford. This should be encouraged and supported through funding, build days, community officer support to ensure the motivation and drive of those engaged is used. It represents potentially low cost options to support a healthy activity.</p> <p>In all cases, engaging with Skateboard England and various bike charities and community support groups will pay dividends. Particularly when it comes to engaging girls.</p> <p>We want teenagers to stay in Wallingford, not disappear to Reading/Oxford town centre at the first opportunity.</p> <p><b>Community and Arts Centre:</b></p> <p>An open hub with space for all ages is essential now. We've lost all such provision of space in Wallingford and while</p>		<p>the public in holiday periods.</p> <p>Wallingford Sports Park offers youth-based sports facilities across range of sports.</p> <p>Tennis courts on the Bull Croft are being refurbished and will be available free of charge, and by day or season ticket fee</p>	<p><b>the equipment and sensory areas, following extensive local consultations.</b></p> <p><b>9.2.17 The Highcroft development includes three Locally Equipped Areas for Play (LEAPs) and one LAP, plus an informal play trail within open space / residential areas, and a youth football pitch which is managed by Wallingford Sports Park. The Winterbrook Meadows development (Site E) will include: a multi-use ball games area, two LAPs, one LEAP, and one combined LEAP and NEAP.</b></p> <p><b>Addition of wheeled sports in 10.1.22 in Chapter 10.</b></p> <p>10.1.22 The Town Council will explore with SODC the opportunity for providing an all year-round pool, a pay and play gym, a skate park <b>and park for wheeled sports</b>, and a 4-court sports hall in full time community use in the Wallingford area. Proposals to secure the provision of a covered swimming pool for all year use in Wallingford or within walking distance (1.6 km) of Wallingford Town Centre will be strongly supported.</p>
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	<p>existing groups (Table Tennis etc) might be able to pay to hire alternatives, there's nothing for any other groups.</p> <p>The space is essential, but more so is the deciding on what services to provide. A youth club often fails and brings negative connotations for teenagers, so, as with play spaces, the investment needs to be in consultation and external expert research and steering on what's been done before and what works.</p> <p>In short - investment in young people, but investment in expertise not just facilities.</p>			
10	<p>From Cholsey Parish Council.</p> <p>Cholsey Parish Council wishes to support the proposed amendments to the Wallingford Neighbourhood Plan.</p>	no	noted	no changes
11.	<p>I believe that the treatment of flood-plains is inadequate. There needs to be special recognition of the role of floodplains for protection against floods, both inside the town and downstream of the town. The present maps confuse the issue by mixing in other topics. There needs to be a proper designation of those areas required for flood protection, with an assumption both that new developments will not be allowed there and that existing properties should not be replaced. The same level of treatment of flood protection should be advised for adjacent areas and for wider area plans.</p>	no	<p>Noted, agreed floodplains are important feature for a riverside town like Wallingford.</p> <p>SOLP 2035 has a Flood Risk policy EP4 which protects floodplain land from development.</p>	<p><b>Chapter 5 new text: Wallingford Nature Recovery Network and Thames Floodplain</b></p> <p><b>5.2.18 The Thames' floodplain in Wallingford includes Castle Meadows, Riverside Meadows and the Thames Wallingford to Goring Conservation Target Area, identified by the Oxfordshire Local Nature Partnership as <a href="#">Core and Recovery Zones</a> in the draft Nature Recovery Network.</b></p> <p><b>5.2.19 Allowing the River Thames to flood into the floodplain mitigates the risk of flooding to houses and businesses in Wallingford and downstream. This is Natural Flood Management as advocated in the Thames Valley Flood Scheme<sup>1</sup> being developed by the Environment Agency.</b></p> <p><b>5.2.20 Any new development within the Thames floodplain must comply with SOLP 2035 Policy EP4 Flood Risk.</b></p> <p><b>A Built-Up Area boundary has been added to the plan, this is tightly drawn around existing</b></p>

<sup>1</sup> <https://engageenvironmentagency.uk.engagementhq.com/hub-page/thames-valley>



				<b>buildings and excludes undeveloped land in Flood Zone 3.</b>
<b>12</b>	<b>From Living Streets, Wallingford</b> We support the plan	no	Noted	No changes
<b>13</b>	Are you recommending various views of how new green spaces on new developments are managed other than town council or management companies are you considering stewardship schemes?	No	Noted. Ongoing maintenance of play areas and green spaces on new developments is not a NP issue.	No changes
<b>14.</b>	2.9 Housing for older people Although the Plan says there is adequate provision for specialist housing I think there is an issue in that much of this is flats rather than bungalows, which many older people would prefer. 7.4 Regal Centre A decision has been delayed for far too long on this and I'm pleased to see that a decision will be made soon. I'd like a mixed commercial/community building but if financially viable would prefer to see it sold as this would at least remove the maintenance burden from the town council 7.7. Car Parking Agree that parking space is inadequate. One of the issues where I live (Highcroft) is that there is no public transport into Wallingford currently from the estate. Thames Travel buses were supposed to be coming into the estate from early this year but have said that the turning circle isn't sufficient to do this, no resolution as yet.	No	Noted. We are waiting for SODC review of housing for elderly and disabled people to be published. Bungalows are being built on the Highcroft development.  Noted.  Noted. Bus services operating in Highcroft from April.	No changes
<b>15.</b>	Chapter 8 Vision and Objectives 8.1. (and 8.2.8.) At the bottom of this box there is a suggestion that Croft Villas could become part of a cycle route through the town. This short road is already used by cyclists but I would urge the Council to come and look at the road before making any decisions. Currently the road is full of potholes, the surface of the road is dangerous for cyclists and pedestrians alike due to the amount of loose gravel and when it rains the road is magically transformed into a lake. This is because Oxfordshire County Council have not maintained the surface of the road and	no	Noted. We recognise the issue of a private road being used as a public right of way. Croft Villas is FP30. If a cycle route is proposed for Croft Villas, it would be subject to consultation to be changed to a Public Bridleway.	No changes

	<p>Thames Water have not maintained the ground water drains. I also believe that Croft Villas is designated as a footpath with vehicular access only to properties on the lane - this would need to be changed were it to be used for bicycles, I might be wrong but think this is true.</p> <p>On a personal level, even if the above were rectified (as I hope it will be), you will notice that I live in Croft Villas and have done so for over 30 years. In order to use my car I have no option but to back out of my drive on to the lane. This is quite difficult as it is at the moment and although I obviously creep out as slow as I can, I have no view until I am a couple of feet into the road. This is fine for pedestrians because they see me reversing and wait for me to be able to see them and stop my car, however cyclists can ride at quite a speed and, generally, seem less aware of what is going on around them. I already worry when I am leaving my house in the car and more cyclists would make this really difficult for me. I would be very open to any suggestions on how this could be made safer for vehicles coming to my house if it would help.</p>			
16.	<p><b>From Wallingford Museum</b></p> <p>We are pleased to comment on the latest Neighbourhood plan and note that there are some positive changes to include further references to the town's heritage eg 4.5.3.</p> <p>There are some changes to the wording about the museum, e.g.7.6.7 but we are happy with the revised text.</p> <p><b>Coach Parking</b></p> <p>We support coach parking at an appropriate site but think that the site opposite the museum should be strictly time limited to only allow set down/pick up e.g. 20 minutes. Currently operators of school coaches and others frequently park for much of the day. The presence of a parked coach blocks views of the Agatha Christie statue by passers-by and the recently installed CCTV cameras on Flint House. It also gives a poor backdrop to the many visitors who photograph the statue. However, it seems as though the policies don't reflect the concern, rather the relevant sections have been largely</p>	no	<p>Noted. The issue of the bus stand opposite the Museum is for discussion with OCC as highway authority.</p> <p>Coaches usually park at the Sports Park and in a layby on the Reading Road in Cholsey.</p>	No changes

	<p>removed as below:</p> <p>7.6.1 The sentence referring to no dedicated coach parking has been deleted.</p> <p>7.8.13: Policy TC6 has been deleted. ie: Provision of Coach Parking TC6.1 Proposals which provide coach-parking facilities for tourism activities will be supported. Support will be given to development proposals for coach-parking providing there is no unacceptable harm to heritage assets or to safe movement of pedestrians and cyclists and there is no conflict with other development plan policies.</p>			
17.	<p><b>From the Corn Exchange</b></p> <p>WS1.1(f) Recognise the importance of the night time economy - ensure any residential developments takes account of this</p>	no	<p>Noted.</p> <p>WNP 2021 states 2.7.11 All development within the built-up area must recognise the interests of nearby homes, existing businesses and community assets and take appropriate measures to ensure that the environment and viability of neighbouring activities is not harmed by new development or through change of use. Applications which have the potential to impact nearby homes, businesses or community facilities shall be expected to demonstrate that they have made appropriate mitigation as set out in paragraph 193 of the NPPF 2023 ('agent of change').</p>	<p><b>Chapter 7 new text</b></p> <p><b>7.3.9 The Corn Exchange is situated on Market Place and performs an important role in providing a cultural offer within the town. It is multi-purpose venue which acts as a theatre, cinema, comedy and music venue. The venue seats 176 people and acts as an important anchor for the evening economy.</b></p>
18.	<p>It's all a bit high level - all the things in the plan are nice to have but no actual concrete plans for any improvement - it's all</p>	yes	Noted.	

	<p>strategy - no tactics</p> <ul style="list-style-type: none"> <li>- Leisure Centre</li> <li>- Community Meeting Place - Regal Centre</li> <li>- Indoor Swimming Pool</li> <li>- Blanket 20mph</li> <li>- Sort out SODC offices space for leisure / pool - do not just sell off</li> </ul>			
19.	<p>There is no provision for young people in the town. Teenagers have no where to go and therefore cause trouble, there is no main space for the town to meet (Regal Centre). Is the infrastructure being assessed and upgraded before more building happens.</p> <ul style="list-style-type: none"> <li>- Swimming pool (all weather) and public exercise facilities</li> <li>- As a younger adult in Wallingford it is not a good place to live, the population will get too old</li> </ul>	yes	<p>Noted.</p> <p>New facilities for children and young people will be provided on Highcroft, Winterbrook Meadows and on the Bull Croft subject to planning permission</p> <p>Youth groups e.g. Scouts, Guides, Brownies, Boys Brigade have equipped premises in Wallingford. Churches' youth groups are also catered for.</p> <p>Wallingford School has youth-based facilities available to the public in holiday periods.</p>	No changes
20.	<p>Too many houses: 'Countryside' outside the urban spread is not the same as space around existing housing. Roads already too busy, pollution, facilities, medical centre can't cope, schools can't cope etc.</p> <p>Who is this for? Developers don't live here! I don't see any new roads, pedestrianize the town centre etc which would be a forward thinking plan. I am writing this, but what will anyone's opinion do in this matter? Absolutely nothing, this is just lip service to show 'consultation'. Is it not?</p> <p>Plans for the Bull Croft:</p> <ul style="list-style-type: none"> <li>- New building, play grounds, etc.</li> <li>- All in favour, that is what we need, facilities for local community</li> </ul>	-	<p>Noted. One of the added benefits of new houses is funding for new and improved facilities and services.</p> <p>Provision is being made for new and improved sports facilities and play areas, new green space, and for a new primary school and medical centre.</p>	No changes

21	I am happy with the ambitions of the NHP - I would like to re-enforce the need for green & community spaces & better infrastructure for cyclists & pedestrians as the population increases	-	Noted	No changes
22	TC3.1 Regal Centre We support the retention of this site for community facilities.	no	Noted.	No changes
23	Where is the community areas for the town - playgrounds and central meeting point for the town - eg. Regal Centre. And that is shut so the only place in the town is Center 70. I am very disappointed with the community focus of the town. Without the Regal Center there is only Center 70 to meet. This is too small and poorly maintained. See crowmarsh and benson have good playgrounds and good public space - Village Halls and other facilities. IT IS VERY POOR.	yes	Noted. There are a significant number of community spaces in Wallingford. The plan highlights all these in Chapters 7 and 9.	No changes
24	I welcome the plan overall and the only additional point I would like to make is in the Chapter on transport that where possible pedestrian and cycle routes should be separated as the combination creates risk to pedestrians and cyclists in practice can rarely give priority to pedestrians as the plan states due to their speed difference. Combined routes tend not to be good for either user therefore and should be avoided.	no	Noted. The designation of shared spaces and routes for pedestrians and cyclists is by the County Council.	No changes
25	<b>Email submission from Directors of Cholsey &amp; Wallingford Railway</b> The board of directors of the Cholsey and Walingford Railway Preservation Society have reviewed the Neighbourhood plan proposed revisions, and wish to make the following representations as part of the consultation process. <u>Recognition of historic, heritage and economic value</u> The board considers that the railway line and preservation society collectively provides an asset of significant historic and heritage value to the town. In addition, the heritage railway attracts visitors to the town and surrounding area and provides an economic value to the businesses of the town. We believe this should be fully reflected in the neighbourhood plan.		Agreed	<b>New photo</b> of Bunk Line to replace photo Ch 7. <b>New text 7.6 (vii) The Cholsey &amp; Wallingford Railway, known as the Bunk Line, and its Preservation Society, provide an asset of significant historic and heritage value to the town. More than 35,000 people visited the Bunk Line in 2022. This heritage railway has open days and weekends throughout the year for steam and diesel trains connecting with mainline services at Cholsey station. It attracts visitors to Wallingford and provides an economic value to local businesses.</b>

	<p>Since 2016 when the original neighbourhood plan was first drafted, the Cholsey and Wallingford Railway has grown significantly. This has included income from annual ticket sales more than doubling (despite not being able to operate due to Covid restrictions for nearly 18 months) as a result of increased visitor numbers.</p> <p>In addition, the preservation society has won two national awards (in 2021 &amp; 2022) and appeared on various regional and national TV programmes and in national newspapers providing publicity for both the railway and town.</p> <p>The increase in income has then been re-invested in improvements at the railway, and continues to bring visitors to the railway and town.</p> <p><u>Movement and Connectivity</u></p> <p>The board remains supportive of any proposal to provide a commuter service between Wallingford and Cholsey, provided this is viable alongside a heritage railway operation that brings its own economic benefit to the town.</p> <p>In particular, we wish to have the policy contained in paragraph 10.1.15 revised from its current form of:          “The Cholsey and Wallingford railway line to be upgraded to national standards to allow for commuting.”          To a revised wording of:          “The Cholsey and Wallingford railway line to be upgraded to national standards to allow for a weekday commuter railway whilst maintaining the existing heritage railway operation.”</p>			<p><b>Ch 8 New text: 8.3.16 The railway bed is owned by Wallingford Town Council and leased by the Cholsey and Wallingford Railway Preservation Society (CWRPS). The Society believes that if the railway line is upgraded to national standards this would allow for a weekday commuter railway to GWR mainline at Cholsey, whilst maintaining the existing heritage railway operation. The Town Council would support this proposal which would enable future promotion of sustainable travel.</b></p> <p><b>Ch 10 New text</b>  <b>10.1.21 The Cholsey and Wallingford Railway line to be upgraded to national standards to allow for a weekday commuter railway whilst maintaining the existing heritage railway operation.</b></p>
26	<p><b>Email submission from Dr Simon Morris, Partner at Wallingford Medical Practice</b></p> <p>I am writing on behalf of the Partners of Wallingford Medical Practice in support of the proposed amendment to Policy WS2, which refers to the allocation of land on Site E (Winterbrook Meadows) to a proposed new Medical Centre.</p> <p>We strongly support this amendment. Wallingford Medical Practice (WMP) needs urgently to relocate to the proposed new site on the Winterbrook Meadows development.</p>		Agreed	<p><b>Dr Simon Morris submitted a Relocation Rationale which is Appendix G to the WNP Review.</b></p> <p><b>Ch 2 New text Policy WS2.2</b></p> <p><b>The 2.2ha of land previously identified for a school on Site E is allocated for a medical centre, with the possibility of some housing, which should ensure that specialist housing needs for older and disabled people locally have been met.</b></p>

<p>This ideal site is just 500m away from the current practice building, and is available as the area put aside for the school is no longer needed by OCC.</p> <p>The area in question is referred to as the Phase 5 development / former school site. This land was promised for community use, including health, if not used for a school, and allocating this land to WMP in the neighbourhood plan would greatly help us to secure the move.</p> <p>We have been in advanced discussions with Berkeley Homes for 2 years and they have stated publicly that they are willing to allocate 1.5 acres of this site to WMP for a Medical Centre. The need for larger premises is urgent due to extensive local housing developments, a rapidly increasing patient list size, and ageing premises no longer suited to expansion.</p> <p>The current premises have been expanded 3 times in the past 30 years and plans for a further expansion were abandoned in 2020 as despite winning planning approval they were not cost effective or adequate in scope.</p> <p>All options for redevelopment of the current site have been exhausted, and the breadth and quality of current services is under threat, as is access.</p> <p>The practice has had to close its list recently and is actively exploring this option again in order to protect services.</p> <p>The current premises measure only 797m<sup>2</sup> and approximately one third of this is not owned or controlled by the practice, rather being leased on an arrangement ending in 9 years. With a current patient list of 18,700, population projections suggest a patient list size of at least 22,500 in the next 10 years alone.</p> <p>Based on standard industry measures the current premises have been established to be 32% undersized.</p> <p>When accounting for the additional clinical roles that are currently a central part of Primary Care Network (PCN) clinical strategy, as well as training, dispensary services and regulations, the building is established to be 46% undersized.</p>		<p><b>Any proposals for the site should:</b></p> <ul style="list-style-type: none"> <li>• <b>Set out the rationale for the size and design of the proposed medical centre demonstrating how long term needs have been considered</b></li> <li>• <b>Provide adequate vehicle and cycle parking for staff and patients</b></li> <li>• <b>Ensure that access to the site encourages both walking and cycling</b></li> <li>• <b>Demonstrate the viability of the medical centre and the scale of housing proposed.</b></li> </ul> <p><b>New text:</b></p> <p><b>2.6.2 The land allocated for a school is no longer required for that purpose, and Policy WS2.2 now allocates that site for a medical centre. During spring 2024, GPs from Wallingford Medical Practice are working with Berkeley Homes to prepare a joint planning application for the site.</b></p> <p><b>2.6.3 It is essential that the design of the new medical centre is sufficient to meet the long-term needs of the local area. The design should allow space for a hub facility for the delivery of medical and health services for people in this part of South Oxfordshire and for possible expansion to meet longer term needs.</b></p> <p><b>2.6.4 The Wallingford Medical Practice is a hub facility with doctor and nurse practitioners, and related community medical services and primary care providing for both Wallingford and many surrounding villages. The current medical centre is at capacity, and the GPs say they will be unable to meet the medical needs of the committed new homes in Wallingford and surrounding areas on</b></p>
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<p>When additionally accounting for population growth, the same calculations show the current building to be 59% undersized. These figures support our own day-to-day experience, being cramped, remote working being a necessity and using every cupboard space in the building in order to maintain our service.</p> <p>The proposed move would allow a building of 2022m2 including pharmacy space.</p> <p>This would allow for the extension of whole time equivalent GP numbers from 9 to 14, with additional GP training capacity and commensurate increases in the numbers of nurses, HCA's, additional clinical roles staff as well as proportional increases in administrative and dispensary staff.</p> <p>This would allow us to continue our leading role as a provider of GP training, ensuring the future workforce, and continue to allow us to operate effectively as the lead practice in the Wallingford and Surrounds PCN.</p> <p>The site under discussion would also allow scope for further future expansion subject to need and funding.</p> <p>Expert healthcare property consultants are actively steering the project on behalf of the practice and are negotiating with specialist developers who are willing to fund the new building.</p> <p>The site has in principle been endorsed by the ICB and the details of the formal proposal are still being negotiated with the ICB. The project has the backing of the Wallingford and Surrounds Primary Care Network Clinical Director Dr David Godsiff, Wallingford Town Council, Thames Valley and Wessex School of Primary Care (GP Training), Reading GP Training Scheme and Mr David Johnston OBE MP.</p> <p>We see the adoption of this amendment as a crucial step in securing the provision of primary care medical services for our patients.</p>			<p><b>their existing site. There is a clear and urgent need for the medical practice to expand with space for more consulting rooms and for supporting services. 'Relocation Rationale' provided by the GPs giving justification and rationale for the relocation is attached at Appendix G.</b></p> <p><b>2.6.5 The growing population within the catchment is leading to increased pressure on existing health facilities. The practice is already 32% undersize compared to NHS space criteria, 46% undersize compared to space criteria for the new NHS structure, and 59% undersize when known future housing development is accounted for. Plans include a future patient capacity of 22,500, which will only just meet the planned population growth within the catchment.</b></p>
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27	<p><b>Email submission from MIGWAL, Mobility Issues Group, Wallingford</b></p> <p><b>General comments: Note:</b> ‘mobility aids’ refers to all types of wheelchair (including powered and power-assisted), mobility scooters, rollators/walkers of all types, crutches, walking sticks and white canes.</p> <p>There are multiple references to developing more walking and cycling routes around Wallingford. We are pleased to see references to ensuring these are accessible to people with limited mobility. Consideration will need to be given to how these routes will be shared by pedestrians (both with and without different types of mobility aids) and cyclists. We also need to remember that some disabled people can cycle and may use adapted bikes.</p> <p>We would like to see a policy around maintenance (and a budget for this) of these routes. For people using mobility aids who need more space, it is important that vegetation does not encroach on pathways, and for everyone's safety and comfort, that paths are free from cracks, bumps and other damage. It is also important that the routes are made from materials which will not be damaged by flooding, as this is likely to get worse as time goes on. Flood damage could render essential commuting and shopping routes inaccessible to disabled people.</p> <p>Maintenance plans for existing pavements and paths also need to be put in place, as poor maintenance is a significant factor in creating poor access across Wallingford, and especially where there are flagstones in the town centre.</p> <p>We would also like to see policy around improving drainage town-wide, as poor drainage can prevent people from seeing where dropped kerbs and crossing points are located, and create boggy conditions in grassy areas which is a slip hazard for people who are unsteady on their feet and difficult to traverse using mobility aids.</p> <p><b>Comments on Chapters/Sections</b></p> <p><b>WS1</b> should mention older/disabled people specifically in terms of access to services and improvements.</p>		<p>Noted this useful submission. Amend text where relevant to use correct terminology for mobility aids.</p> <p>Maintenance of footways and highways, and drainage are not part of Neighbourhood Plan.</p> <p>Reference to management of encroaching vegetation is made in Chapter 10.</p> <p>Oxfordshire has a fix my street website where maintenance issues can be reported for attention.</p>	<p>Additional and amended text in Chapter 10, to use correct terminology</p> <p><b>10.1.8 Wallingford Town Council will work with Oxfordshire County Council and other partners to improve safe, active travel opportunities for everyone, including people using mobility aids. This will be achieved through initiatives including, but not restricted to, the following:</b></p> <ol style="list-style-type: none"> <li><b>1. Support parking enforcement including a ban on pavement parking.</b></li> <li><b>2. Ensure pedestrian footways are kept clear of overgrowing vegetation.</b></li> <li><b>3. Create cycle lanes, for example on Hithercroft and St John’s Road between the Wallingford Sports Park and Reading Road, to encourage cyclists to use this route to access employment and sports locations.</b></li> <li><b>4. Support and develop the improvement of narrow roads that are shared between vehicles and cyclists. (e.g. Goldsmith’s Lane) by including roadside signs and roadway symbols to encourage appropriate priority for cyclists and pedestrians as appropriate. This has already been successfully achieved on Wallingford Bridge.</b></li> <li><b>5. Clearly signpost pedestrian routes that are shared with cyclists as having priority for pedestrians. Church Lane is an example of a road that is shared between vehicles, cyclists and pedestrians, and should be signposted in favour of pedestrians.</b></li> <li><b>6. Support introduction of 20mph speed limits in Wallingford</b></li> <li><b>7. Support the work of the Wallingford Speedwatch community group.</b></li> <li><b>8. Continue to explore the possibility of temporary or permanent pedestrianisation of the</b></li> </ol>
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<p><b>2.9. Housing for Older and Disabled People</b> (we welcome the title change here to include disabled and not just older people)  We note that there is currently no allocation for any further housing for older or disabled people, but this is being reviewed by SODC’s housing needs study. We would like to point out that the housing needs of older people and younger disabled people are different, and therefore variety is needed in accessible housing stock. Working-age disabled people may require Part M standard housing which has multiple bedrooms so that they may reside with a young family. At site B, for example, there are plenty of bungalows but these are all a maximum of 2 bedrooms, which meets the needs of older people wishing to downsize, but not younger disabled people with families. We refer to point 2.5.3 which states that young families are the fastest growing age group currently. Accessible accommodation needs to be affordable to all budgets. Due to the disability pay gap and some disabled people’s limited ability to work, this population may have a lower budget than non-disabled people. Policy needs to ensure that accessible accommodation is not restricted to certain ages e.g. over 50s, and also that it is integrated with other housing types. This avoids housing all older people together, separating them from the rest of the community. It also avoids younger disabled people being forced to live in this situation too. We would have liked to see a policy of requiring parking for new houses to be on the plot not on-street.  <b>HD3:</b> In reference to the Traditional Shopfront Design Guide, it should be mentioned that the guide permits and encourages changes to shop fronts to make them more accessible, and provides specific guidelines around entrances.  <b>HD4:</b> Lighting does need to be sufficient to allow visually impaired people to move around safely at night.  <b>HA1:</b> Alterations to improve access should be allowed and encouraged. Improving access will ensure buildings are still used.</p>		<p>Noted</p> <p>Noted</p> <p>Whilst the neighbourhood plan can seek provision if a need is identified it cannot control prices.</p> <p>Parking standards are generally set by OCC, whilst we are seeking a slightly higher standard this is discretionary.</p>	<p><b>Market Place.</b>  <b>9. Strongly encourage through-traffic to use the by-pass.</b>  <b>10. Deter rat-running through residential streets in North West Wallingford which are used daily by the children attending three schools, in particular explore strategies to inhibit such traffic from using Wilding Road and surrounding streets.</b>  <b>11. Ensure legal alternative forms of travel, e.g. e-bicycles, wheelchairs and mobility scooters, can be used safely, including by creating dropped kerbs on residential developments and within the town centre.</b>  <b>12. Work with Oxford Bus Company and Going Forward Buses to identify and support bus routes serving Wallingford town centre and residential areas.</b>  <b>13. Liaise with the District and County Councils on strategic bus routes which have Wallingford as a key hub and maintain minimal and not diversionary routing.</b></p>
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<p><b>EE04:</b> Access improvements are a crucial aspect of ensuring long term viability, especially with an ageing population, so need to be included in any plans.</p> <p><b>6.2:</b> We need to ensure accessible job opportunities including accessible co-working spaces as some disabled people can only work from home/flexibly. Any changes to employment land need to ensure access features such as sufficient disabled parking for disabled employees and customers. Policy needs to ensure that new businesses relocating to Wallingford and/or business premises built or refitted include facilities and access for disabled employees.</p> <p><b>Chapter 7:</b> One of the objectives should be to improve access around the town. This is a key part of ensuring long term viability and maintaining footfall for local businesses. We have an older population in Wallingford and the ONS predicts a greater number of older people in Oxfordshire in the future. If we want our town centre, businesses and recreational facilities to be used as much as possible by the local population, they must be accessible to people with mobility difficulties.</p> <p><b>TC 3.1:</b> Any proposal should use universal design principles to ensure the best access possible.</p> <p><b>7.8.11:</b> It should be noted that some disabled people have to travel by car as they cannot use public transport even if it is accessible.</p> <p><b>8.1:</b> We are pleased to see that disabled parking will be more widely available. It should be noted that the number of disabled parking spaces needs to be proportionate to the number of people who need to use them. There have been recent updates to the Blue Badge criteria, meaning that there will be a greater number of people needing disabled parking spaces.</p> <p><b>MC04:</b> We are pleased to see that the DfT guidance should be used to ensure access for all on pavements. There may be a typo here as the title is quoted as 'The Inclusive Transport and Strategy'. For people with mobility difficulties, we agree that more pedestrian space is needed in the town centre. MIGWAL</p>		<p>Noted</p> <p>Noted. The Equality Act and Building Regulations will ensure access improvements wherever physically possible</p> <p>Noted.</p> <p>Noted. These matters are not for Neighbourhood Plan</p> <p>Noted.</p> <p>Improvements to enable older and disabled people to have better access throughout Wallingford was discussed by the Working Group before changes made</p> <p>Noted the word 'and' removed</p>	
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<p>would support any further plans for pedestrianisation of part(s) of the town centre for two main reasons. Firstly, more space would mean it is easier for people with mobility difficulties to move around. Secondly, more space means that more shops may be able to provide temporary ramps, and/or have the space to permanently improve access to their entrances.</p> <p><b>MC10:</b> We wonder why the idea of a park and ride scheme has been abandoned? With little scope for increasing parking in the town centre, this would seem a logical idea.</p> <p><b>MC 1.4(h):</b> We are pleased to see the needs of people who use wheelchairs and mobility scooters are being considered here. Please reconsider the use of the term ‘invalid carriages’, you could just specify wheelchairs and scooters. ‘Invalid’ is an outdated term which most disabled people dislike. The needs of people using walkers/rollators, crutches, sticks, white canes and assistance dogs also need to be considered, as they differ from the needs of non-disabled pedestrians. MIGWAL would be happy to assist in policy development in this area.</p> <p><b>8.3.5 (v):</b> We are pleased to see mention of ensuring access to buses for wheelchair users and others who require or benefit from level access.</p> <p><b>MC4:</b> We are glad to see a commitment to ending pavement parking, which can make pavements completely inaccessible to people using mobility aids.</p> <p><b>MC4.1(h):</b> We are pleased to see this section on making adequate provision for people with mobility needs and provision of disabled parking. Electric car charging points also need to be accessible to those with mobility difficulties. Here is a link to the government guidance on electric vehicle charging points which mentions accessibility issues: <a href="https://www.gov.uk/government/consultations/design-considerations-for-electric-vehicle-chargepoints">Design considerations for electric vehicle chargepoints - GOV.UK (www.gov.uk)</a></p> <p><b>Chapter 9:</b> We are pleased to see a commitment to disabled people’s access to water-based leisure activities and other leisure amenities. We support the idea of an indoor swimming</p>		<p>Noted</p> <p>Noted</p> <p>Noted. ‘invalid carriages’ removed</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	
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<p>pool if this will be accessible to disabled people. It would need to have accessible changing facilities and showers, level access throughout and a hoist to access the pool for those who need it.</p> <p>Somewhere in this chapter it should be acknowledged that currently the play park equipment in Wallingford has very little to no provision for disabled children. We appreciate the stated aim that play equipment should be accessible to all and we support the plans for the Bullcroft which will create an inclusive play area for children.</p> <p><b>9.2.2:</b> We are pleased to see acknowledgement of the issues with the Thames Path for people using mobility aids, and hope that these can be addressed.</p> <p><b>9.2.19:</b> We are pleased to see the mention of accessible allotments.</p> <p><b>10.1.1:</b> We are pleased to see that the councils will work together to improve access and that opportunities to improve access when maintenance work is done will be supported.</p> <p><b>Chapter 10:</b> We would have liked to have seen a specific access policy committing to complete town-wide access for people using mobility aids. As previously mentioned, this is essential for the future of a town with an ageing population.</p> <p><b>Other points that we felt were missing from the plan:</b></p> <ul style="list-style-type: none"> <li>- Specific policy for improving the access of Town Council owned buildings, as these are some of the least accessible in the town.</li> <li>- The need for green spaces to be accessible - having accessible entrances, appropriate pathways and a mix of seating both with and without armrests. Most, if not all, seating should have a back rest.</li> <li>- A survey is needed on trees to see where roots have created humps and cracking in the pavements, outside Waitrose is a good example of this problem.</li> <li>- The cemetery needs work to improve the access roads and paths</li> </ul>		<p>Noted.</p> <p>Noted. The WTC proposals for new play equipment at Bull Croft are inclusive for all children</p> <p>Noted</p> <p>Noted.</p> <p>Noted</p> <p>Noted.</p> <p>Noted.</p>	
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	<p>- A proposal for an accessibility transformation fund for listed buildings in the commercial areas of town, with a commitment for a Town Council representative to oversee applications and works. The reason for this is that improving access to listed buildings is entirely possible, but a little more complicated than with buildings which are not listed.</p>			
28	<p><b>Email submission from Williams Gallagher representing the Wilder family received 6 April</b>  WALLINGFORD NEIGHBOURHOOD PLAN REGULATION 14 PUBLIC CONSULTATION REPRESENTATIONS ON BEHALF MR &amp; MRS T AND A WILDER AND MR AND MRS J AND R WILDER  Williams Gallagher is instructed by our clients, Mr &amp; Mrs T and A Wilder and Mr and Mrs J and R Wilder, registered co-owners ('the Owners') of land and buildings between Lower Wharf and St Lucian's Lane in Wallingford ('The Wharf Garden' / 'the Site' – see Figure 1 below), to submit representations in connection with the Wallingford Neighbourhood Plan ('WNP') Regulation 14 Consultation which runs until 6 April 2024. SUMMARY In summary, the Owners strongly object to the proposed amendment to Policy WS3 ('Development within the Built-Up Area') and the associated Policies Map at Para 2.7 of the draft Plan (namely the 'Wallingford Built-Up Area Boundary') (Map 3): (i) it is our strong contention that the Site and surrounding land and premises should remain part of the settlement boundary / built-up area of Wallingford – they have always formed part of the built-up area of Wallingford and cannot in anyway be described as 'isolated' from the remainder of the area or forming part of the 'countryside'; (ii) insufficient evidence / justification has been put forward by the Town Council / WNP Working Group to suggest otherwise; and (iii) the proposed introduction of this Built-Up Area Boundary should be regarded as a material modification to the nature of the adopted WNP that requires a referendum post-examination – this is because it introduces changes to the</p>	Yes	<p>Discussed by the Working Group, agreed to modify the boundary to include the two houses referred to by Williams Gallagher within the Built-up Area, but not the OU Boathouse, or gardens to the river, or garden sheds/outbuildings at St Lucian's – all within Flood Zone 3.</p> <p>WNP Review is in conformity with SOLP 2035 Policy EP4 Flood Risk which applies strict sequential testing to proposals for development on Flood Zone land.</p>	<p>The Built-up Area Boundary line has been modified in the Lower Wharf/St Lucian's area to reflect more closely the Flood Zone 3 boundary.</p> <p><b>Appendix H</b> explains the rationale and justification for the precise boundary. Paragraphs 2.7.1 – 2.7.12 support Policy WS3. Amendments in bold below reflect the changes made after representations from the Wilder family and their agent.</p> <p>2.7.1 Following the overall strategy set out for Local Plan Policy STRAT1, which identifies a need to distinguish between towns and villages and countryside areas where different policies apply, there is a clear need for a distinction between the built-up area of the town where certain forms of development are likely to be appropriate and the countryside, where conservation and enhancement of the environment are most important</p> <p>2.7.2 Defining the Built-up Area Boundary is a logical way of applying Government advice and strategic policy at the local level. The principle of settlement boundaries is consistent with the NPPF 2023 which expects planning to take account of the character of different areas recognising the intrinsic character and beauty of the countryside, provided the boundary is not preventing the delivery of a supply of housing.</p> <p>2.7.3 The Built-up Area Boundary and related</p>

<p>nature of the Plan and has the potential to prohibit sustainable development on land, including land and premises owned by our clients, which under the provisions of the adopted WNP, could be reasonably and justifiably be regarded as forming part of the Wallingford Built-Up Area. BACKGROUND TO REPRESENTATION &amp; SITE CONTEXT By way of background, Mr &amp; Mrs T and A Wilder own and live in The Boathouse which is situated to the north of the Site and Mr and Mrs J and R Wilder own and live in the adjacent house, The Salthouse. Both families share ownership of the private road leading to the Site from Lower Wharf and the Site itself. The Site and all of the land to the west of St Lucian's House, leading to Reading Road, originally formed part of the grounds of the Grade II listed building of St Lucian's. In the 1970s, the land to the west of St Lucian's was separated from the main house and was granted permission for a the development of a retirement home complex between Lower Wharf and St Lucian's Lane. The Site to which this representation refers was made physically separate from the grounds of St Lucian's twelve years ago by way of heavy screening in the form of fencing in addition to vegetation and planting. There is no access to the Site from the St Lucian's estate and it remains autonomous. The Site is also screened from the river by fencing. The Grade II St Lucian's building and associated grounds are under separate ownership to the Site. 2 The Site is currently host to 2 no. barns (i.e. built development which has been in situ for over a century) . At the end of the barn to Lower Wharf (Barn No. 1), there was originally an additional dwelling that caught fire and was demolished in the 1960s (see Figure 1). The Site, together with its original dwelling and the barns, has always formed part of the built up area / settlement boundary of Wallingford. It has also been in continual and current use for storage of garden furniture and equipment and entertainment purposes by the Owners who also continue to maintain the grounds for enjoyment and use by both families. Access to the Site can be achieved from both Lower Wharf (via</p>		<p>policies provide the basis for development management decisions to: define those areas within which planning permission will normally be granted for new development, subject to other planning policies; ensure new development is sustainable; enable the best use to be made of existing and future services; provide a useful tool to protect and preserve Wallingford's important and sensitive setting by protecting the surrounding countryside from inappropriate development. 2.7.4 Development which consolidates the built form and is in accordance with all the relevant policies will be supported and encouraged, but proposals for inappropriate development spreading over the countryside surrounding the town not in line with relevant policies will not be supported. It is not simply a means of showing the limits of existing development, as some developed areas lie outside it, and some undeveloped areas lie within it. <b>Appendix H explains in detail the justification for the boundary selected. The principles used in defining the Built-up Area Boundary are inclusion of:</b> • the main residential and/or commercial areas • areas on the edges of the town where planning permission has already been granted for housing • other land on which housing may be acceptable. 2.7.5 We have not included the following within the Built-up Area Boundary: • school playing fields, recreation grounds and allotments where these adjoin the rural area • groups of isolated houses or other buildings where infilling or intensification of development would result in harm to the character and appearance of the rural area or setting of the National Landscapes and would be inappropriate • land within the curtilage of houses which adjoin</p>
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<p>the aforementioned private road) and St Lucian’s Lane to the south (see Figure 1). The Thames Path (a National Trail<sup>1</sup>) separates the main part of the Site from the Thames frontage to the east. The Thames Path is defined by fencing on both the east and west sides.</p> <p>REPRESENTATION It is understood that the WNP Regulation 14 Consultation relates to a series of proposed updates to the WNP, which Wallingford Town Council’s WNP Working Group consider to be: “material modifications that do not change the nature of the adopted WNP”. Of particular interest to our clients are the proposed updates to Policy WS3 (Development within the BuiltUp Area) and the associated introduction of a new Policies Map at Para 2.7 of the draft Plan which defines what Wallingford Town Council consider to be the ‘Wallingford Built-Up Area’ (replicated below at Figure 2).</p> <p>Wallingford Town Council’s rationale for this modification is set out in updated supporting text to Policy WS3, Para 2.7.1 onwards: 2.7.1 Following the overall strategy set out for Local Plan Policy STRAT1, which identifies a need to distinguish between towns and villages and countryside areas where different policies apply, there is a clear need for a distinction between the built-up area of the town where certain forms of development are likely to be appropriate and the countryside, where conservation and enhancement of the environment are most important. 2.7.2 Defining the Built-up Area Boundary is a logical way of applying Government advice and strategic policy at the local level. The principle of settlement boundaries is consistent with the NPPF 2023 which expects planning to take account of the character of different areas recognising the intrinsic character and beauty of the countryside, provided the boundary is not preventing the delivery of a supply of housing. 2.7.3 The Built-up Area Boundary and related policies provide the basis for development management decisions to: define those areas within which planning permission will normally be granted for new development, subject to other planning policies; ensure new development is sustainable; enable the</p>		<p>the rural area where back-land development would be inappropriate • green buffer and land which falls outside of the curtilage of houses. • <b>Land within flood zone 3 and/or within 10m of a main river</b></p> <p>2.7.6 Although boundaries provide a useful guide for decision-making, all proposals must have regard to all other planning policies in the NPPF 2023 and the Development Plan.</p> <p>2.7.7 Wallingford presents a series of challenges in terms of how best it can incorporate new development within its historic environment. We support the efficient use of resources and in particular Local Plan 2035 paragraph 8.25 which indicates that ‘All development will be expected to use land efficiently, with a density and form appropriate to the site and its surroundings, considering local character and accessibility to services and facilities.</p> <p>2.7.8 Smaller sites elsewhere in the town will also be affected by the principles in Policy STRAT5 of the Local Plan. In these cases, there will be a balance to be struck between achieving sustainable development and appropriate densities on the one hand with a series of other matters including the importance of achieving high quality design in general, and safeguarding heritage assets on the other hand.</p> <p>2.7.9 Well designed and located infill development within the built-up area helps to provide more homes in a variety of types and sizes and can make an important contribution to the housing supply.</p> <p>2.7.10 In 2023 planning permission was given for St Nicholas CoE School in St Nicholas Road to relocate to Highcroft, which is expected to be completed by 2026. The school’s current site will be available for</p>
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<p>best use to be made of existing and future services; provide a useful tool to protect and preserve Wallingford's important and sensitive setting by protecting the surrounding countryside from inappropriate development.</p> <p>2.7.4 Development which consolidates the built form and is in accordance with all the relevant policies will be supported and encouraged, but proposals for inappropriate development spreading over the countryside surrounding the town not in line with relevant policies will not be supported. It is not simply a means of showing the limits of existing development, as some developed areas lie outside it, and some undeveloped areas lie within it. The principles used in defining the Built-up Area Boundary are inclusion of: • the main residential and/or commercial areas • areas on the edges of the town where planning permission has already been granted for housing • other land on which housing may be acceptable. 2.7.5 We have not included the following within the Built-up Area Boundary: • school playing fields, recreation grounds and allotments where these adjoin the rural area • groups of isolated houses or other buildings where infilling or intensification of development would result in harm to the character and appearance of the rural area or setting of the National Landscapes and would be inappropriate • land within the curtilage of houses which adjoin the rural area where back-land development would be inappropriate • green buffer and land which falls outside of the curtilage of houses. • Land within flood zone 3 and/or within 10m of a main river. Paragraph 1.6.3 is also of note as it sets out what the update to the WNP aims to assess: 1.6.3 Much of the WNP 2021 is still relevant and up to date. This review does not seek to change the overall approach and local strategy set out in the 2021 plan rather it aims to assess: • whether policies need changing as a result of the adoption of the South Oxfordshire Local Plan 2035 or changes to the NPPF 2023 or other material considerations • whether work has been undertaken so policies are no longer needed • whether policies have not</p>			<p>reuse. Continued educational and community uses would be an option for the site. Alternatively, the part of St Nicholas school site that is already developed could be used for housing, with a preference for social, affordable housing or housing for elderly people. The playing field should be retained as open space as there is very limited open space available to the community north of Wantage Road. Any proposals should be considered in accordance with Policy WS3: Development within the Built-Up Area.</p> <p>2.7.11 All development within the built-up area must recognise the interests of nearby homes, existing businesses and community assets and take appropriate measures to ensure that the environment and viability of neighbouring activities is not harmed by new development or through change of use. Applications which have the potential to impact nearby homes, businesses or community facilities shall be expected to demonstrate that they have made appropriate mitigation as set out in paragraph 193 of the NPPF 2023 ('agent of change').</p> <p>2.7.12 The built-up area boundary will not limit existing homes outside that area from undertaking reasonable alterations or extensions, much can be undertaken through permitted development. Development plan policies also make provision for replacement dwellings. Proposals for new homes or buildings would need to be consistent with national policies for rural housing and economies and development plan policies for rural areas.</p>
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<p>worked as well as intended and need adjustment • whether there were gaps in the suite of policies which need to be filled. Our client understands the rationale behind the introduction of the proposed boundary and the overarching principles that have been applied in order to define it. Indeed, it is acknowledged that the introduction of such a boundary (also known as a settlement boundary) is a policy tool commonly applied by local authorities at their discretion and whilst not specifically defined in legislature or planning policy guidance, enable said local authorities to clearly define areas of countryside where stricter policies relating to new build development are likely to apply. The boundary that has been defined in this case is however poorly justified overall and not in the spirit of the aims of the update which only seeks to adjust existing policies where these policies “have not worked as well as intended and need adjustment” (Para 1.6.3). There needs to be greater scrutiny of the individual sites / areas of land that are proposed to be excluded from the boundary.</p> <p>It is furthermore the case that no evidence has been put forward to suggest that the existing policy has not worked (namely Policy WS3) and as such needs adjustment / refinement in the form of a settlement boundary; there is also no clear indication as to which of the exclusion criteria at Para 2.7.5 would apply to the Site and surrounding land and premises. This is surprising as they clearly form part of the built up area of Wallingford and cannot in anyway be described as ‘isolated’ from the remainder of the area or forming part of the countryside. The Site is within a built-up area and is within the town. There are dwellings to the north, south, and west. Views from the riverbank opposite the Site are shielded by a mature hedge on the river side of the Thames path and a fence on the Site.</p> <p>Also, whilst the OS Map upon which the proposed boundary is overlaid (Map 3 of the draft WNP) would appear to show limited built development, detailed interrogation reveals that</p>			
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<p>the area is in fact host to much built development and previously developed land including the Site, St Lucian’s House to the northwest, the Boathouse to the north, Springwater to the south and the Oxford University Boat Club to the south (see Figure 3). To describe this area as not comprising part of the ‘built up area’ (in other words the settlement of Wallingford) is an inaccurate representation of what exists on the ground.</p> <p>It is acknowledged that it may well be that this area has been excluded from the boundary to prevent future harm to the character and appearance of the Chiltern National Landscape / AONB to the west and the town’s appearance from the river. This harm is however an assumed harm and not one that is supported by any evidence / clear justification – evidence that would be required should an application come forward in this location, regardless of whether or not the amendments to the Plan are made. Indeed, it is the case that adopted Policy WS3 already makes explicitly clear that even where development takes place within the built-up areas of Wallingford, it must not have an unacceptable impact on the landscape setting of the town, site and its surroundings including the setting of the adjacent Chilterns AONB (now National Landscape).</p> <p>The consequence of the Site’s exclusion is to prevent development that could otherwise be potentially acceptable having regard to / be in conformity with the adopted SODC, prevailing national policy and guidance and Policy WS1 and Para 2.7.9 of the WNP which states, inter alia, that: “well designed and located infill development within the built-up area helps to provide more homes in a variety of types and sizes and can make an important contribution to the housing supply”.</p> <p>It is in view of the above that our client strongly objects to the proposed amendment to Policy WS3 (‘Development within the Built-Up Area’) and the associated Policies Map at Para 2.7 of the draft Plan (namely the ‘Wallingford Built-Up Area</p>			
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<p>Boundary') (Map 3). We contend that there are strong grounds to include the Site and surrounding land and premises within the boundary as illustrated above and in accordance with the marked-up plan below (Figure 4). Insufficient evidence / justification has been put forward by the Town Council to suggest otherwise. The proposed boundary is not in the spirit of the aims of the update which only seeks to adjust existing policies where these policies "have not worked as well as intended and need adjustment".</p> <p>Figure 4: Proposed Amendment to Built-Up Area Boundary (Area Shaded Green)</p> <p>Source: Draft WNP Map 3 with Williams Gallagher Mark Up</p> <p>In addition to the above, we note that Wallingford Town Council's WNP Working Group consider the amendments to be: "material modifications that do not change the nature of the adopted WNP". This means that, in accordance with Planning Practice Guidance 085a Reference ID: 41-085a-20180222, the update would need to be subject to independent examination but not a referendum.</p> <p>Our view is that the amendments have the potential to change the nature of the Plan through the introduction of a built-up area boundary, the full extent of which is not representative of what constitutes the built-up area of Wallingford. This has the effect of restricting development in areas that would otherwise be potentially acceptable having regard to the current WNP.</p> <p>To this end, it is arguable that this results in a material modification which changes the nature of the plan (which supports, inter alia, well-designed and located infill development within the built-up area) requiring examination and, importantly, a referendum.</p> <p>As a final point, my clients wish to express its disappointment as to the extent of publicity that this Consultation has been given. It is only by chance that our clients have been made aware of the consultation which is surprising given the magnitude of the implications that the proposed amendments</p>			
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	<p>will have on those with interests in the town. As a minimum our client would have expected to be notified by post, alongside all other owners of land to be excluded from the built-up area. In respect of which, we look forward to receiving a copy of the requisite consultation statement, preferably in advance of the submission of the Plan for independent examination. We also look forward to confirmation of receipt of these representations and to further discussion regarding their content. In the meantime, please do not hesitate to contact the undersigned should you have any queries.</p>			
29	<p><b>Email submissions from Wilder family received on 5 April</b></p> <p>I would like to object to the changes to the existing Neighbourhood Town Plan. I object to the new definition of the built-up area boundary to the town policy WS3. I consider the changes proposed constitute material modifications that change the nature of the Wallingford Neighbourhood Development Plan.</p> <p>As a resident of the area with a large line through, it looks like the middle of my house in Lower Wharf I would like to meet with councillors to discuss this.</p> <p>-----</p> <p>I am writing to you in relation to the consultation relating to the revision to the Wallingford Neighbourhood Plan. I would like to object to the "built-up area" line on the revised map included in chapters 2 and 3, shown below.</p> <p>The reason for my objection is that the green line clearly excludes areas that are already developed including residential dwellings/buildings at the bottom of Lower Wharf, Thames street and st lucians Lane. additionally also omitted is the large area of development that comprises the Oxford University boat club. All of these areas should be included due</p>		<p>Discussed by the Working Group, agreed to modify the boundary to include the two houses referred to by the Wilder family within the Built-up Area, but not the OU Boathouse, or gardens to the river, or garden sheds/outbuildings at St Lucian's – all within Flood Zone 3.</p> <p>WNP Review is in conformity with SOLP 2035 Policy EP4 Flood Risk which applies strict sequential testing to proposals for development on Flood Zone land.</p>	<p>The Built-up Area Boundary line has been modified in the Lower Wharf/St Lucian's area to reflect more closely the Flood Zone 3 boundary.</p> <p><b>Appendix H</b> explains the rationale and justification for the precise boundary. Paragraphs 2.7.1 – 2.7.12 support Policy WS3. Amendments in bold below reflect the changes made after representations from the Wilder family and their agent.</p> <p>2.7.1 Following the overall strategy set out for Local Plan Policy STRAT1, which identifies a need to distinguish between towns and villages and countryside areas where different policies apply, there is a clear need for a distinction between the built-up area of the town where certain forms of development are likely to be appropriate and the countryside, where conservation and enhancement of the environment are most important</p> <p>2.7.2 Defining the Built-up Area Boundary is a logical way of applying Government advice and strategic policy at the local level. The principle of settlement boundaries is consistent with the NPPF 2023 which expects planning to take account of the character of different areas recognising the</p>

	<p>to the existence of existing development. please see below the enhanced extract of the map and a copy of a satellite image showing the development between the green and red lines. I trust you will agree and amend the green line to mirror the red line in this section.</p>		<p>intrinsic character and beauty of the countryside, provided the boundary is not preventing the delivery of a supply of housing.</p> <p>2.7.3 The Built-up Area Boundary and related policies provide the basis for development management decisions to: define those areas within which planning permission will normally be granted for new development, subject to other planning policies; ensure new development is sustainable; enable the best use to be made of existing and future services; provide a useful tool to protect and preserve Wallingford's important and sensitive setting by protecting the surrounding countryside from inappropriate development.</p> <p>2.7.4 Development which consolidates the built form and is in accordance with all the relevant policies will be supported and encouraged, but proposals for inappropriate development spreading over the countryside surrounding the town not in line with relevant policies will not be supported. It is not simply a means of showing the limits of existing development, as some developed areas lie outside it, and some undeveloped areas lie within it. <b>Appendix H explains in detail the justification for the boundary selected. The principles used in defining the Built-up Area Boundary are inclusion of:</b></p> <ul style="list-style-type: none"> <li>• the main residential and/or commercial areas</li> <li>• areas on the edges of the town where planning permission has already been granted for housing</li> <li>• other land on which housing may be acceptable.</li> </ul> <p>2.7.5 We have not included the following within the Built-up Area Boundary:</p> <ul style="list-style-type: none"> <li>• school playing fields, recreation grounds and allotments where these adjoin the rural area</li> <li>• groups of isolated houses or other buildings where infilling or intensification of</li> </ul>
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			<p>development would result in harm to the character and appearance of the rural area or setting of the National Landscapes and would be inappropriate • land within the curtilage of houses which adjoin the rural area where back-land development would be inappropriate • green buffer and land which falls outside of the curtilage of houses. • <b>Land within flood zone 3 and/or within 10m of a main river</b></p> <p>2.7.6 Although boundaries provide a useful guide for decision-making, all proposals must have regard to all other planning policies in the NPPF 2023 and the Development Plan.</p> <p>2.7.7 Wallingford presents a series of challenges in terms of how best it can incorporate new development within its historic environment. We support the efficient use of resources and in particular Local Plan 2035 paragraph 8.25 which indicates that 'All development will be expected to use land efficiently, with a density and form appropriate to the site and its surroundings, considering local character and accessibility to services and facilities.</p> <p>2.7.8 Smaller sites elsewhere in the town will also be affected by the principles in Policy STRAT5 of the Local Plan. In these cases, there will be a balance to be struck between achieving sustainable development and appropriate densities on the one hand with a series of other matters including the importance of achieving high quality design in general, and safeguarding heritage assets on the other hand.</p> <p>2.7.9 Well designed and located infill development within the built-up area helps to provide more homes in a variety of types and sizes and can make an important contribution to the housing supply.</p>
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Table 2: Submissions from Oxfordshire County Council and South Oxfordshire District Council

Oxfordshire County Council Comments on WNP April 2024			
Ref	Comment	WTC response	Change to plan
1	<p><b>Strategic Planning</b>  <b>Policy WS1: The local strategy for Wallingford.</b>                      The proposed changes to part 1 are positively worded and align with the principles of net zero set out in Oxfordshire County Council’s Climate Action Framework, in terms of minimising greenhouse gas emissions, reducing vulnerability, improving community resilience to climate change and maximising renewable and low carbon energy sources and sustainable water use.</p>	Noted	
2	<p><b>Policy EE1: Allocation of employment land.</b> We note that this policy (which allocated an employment site to the west of Hithercroft Industrial Estate) has been removed from the review</p>	Noted	
3	<p><b>Policy WS2: The land allocation for housing in Wallingford:</b> We note that existing primary care provision in the plan area is at capacity and unable to meet future needs arising from new housing development. Any future additional capacity will be met through the provision of a new medical centre on site E (which would replace the primary school) and/or through future expansions to the existing medical centre (see policy CF5). For clarity and consistency, suitable alternative uses should be identified in the event that a new medical centre is no longer required to meet future needs.</p>	Noted	<p>Ch 2. New policy WS2.2 and text  <b>The 2.2ha of land previously identified for a school on Site E is allocated for a medical centre, with the possibility of some housing, which should ensure that specialist housing needs for older and disabled people locally have been met. Any proposals for the site should:</b></p> <ul style="list-style-type: none"> <li>• Set out the rationale for the size and design of the proposed medical centre demonstrating how long term needs have been considered</li> <li>• Provide adequate vehicle and cycle parking for staff and patients</li> <li>• Ensure that access to the site encourages both walking and cycling</li> <li>• Demonstrate the viability of the medical centre and the scale of housing proposed.</li> </ul> <p><b>New text:</b>                      2.6.2 The land allocated for a school is no longer required for that purpose, and Policy WS2.2 now allocates that site for a medical centre. During</p>

		<p>spring 2024, GPs from Wallingford Medical Practice are working with Berkeley Homes to prepare a joint planning application for the site.</p> <p><b>2.6.3</b> It is essential that the design of the new medical centre is sufficient to meet the long-term needs of the local area. The design should allow space for a hub facility for the delivery of medical and health services for people in this part of South Oxfordshire and for possible expansion to meet longer term needs.</p> <p><b>2.6.4</b> The Wallingford Medical Practice is a hub facility with doctor and nurse practitioners, and related community medical services and primary care providing for both Wallingford and many surrounding villages. The current medical centre is at capacity, and the GPs say they will be unable to meet the medical needs of the committed new homes in Wallingford and surrounding areas on their existing site. There is a clear and urgent need for the medical practice to expand with space for more consulting rooms and for supporting services. 'Relocation Rationale' provided by the GPs giving justification and rationale for the relocation is attached at Appendix G.</p> <p><b>2.6.5</b> The growing population within the catchment is leading to increased pressure on existing health facilities. The practice is already 32% undersize compared to NHS space criteria, 46% undersize compared to space criteria for the new NHS structure, and 59% undersize when known future housing development is accounted for. Plans include a future patient capacity of 22,500, which will only just meet the planned population growth within the catchment.</p>
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4	<b>Paragraph 9.2.33</b> needs to be updated (as the references are now out of date) as follows: “ <del>Education proposals are set out in Oxfordshire County Council’s Children, Education &amp; Families Business Strategy 2015/16—2017/18, the Pupil Place Plan 2018-2022 Oxfordshire County Council’s latest Children and Young People’s Plan 2018 – 2023 and the Pupil Place Plan 2022- 2027 and their successor strategies and plans”.</del>	Noted	Paragraph 9.2.32 changed to this wording: <b>9.2.31 The overall population of Wallingford and surrounding villages will grow with more housing, and this will result in increased pressure on existing education facilities. Provision should continue to be made for local children to attend Wallingford School rather than be pushed out to schools some distance away e.g. Didcot or Watlington.</b>
5	<b>Policy EV1: Green spaces and green corridors:</b> New development proposals should also have regard to the priorities identified in the Oxfordshire Local Nature Recovery Strategy, which will be subject to public consultation later in 2024. Please update paragraphs 5.3.3 and 5.3.6 and policy EV2 1(c) accordingly.		As this document is still in preparation and subject to further consultation we cannot refer to it in a policy. A new sentence has been added to para 5.3.1: <b>New development proposals should have regard to the priorities identified in the latest Oxfordshire Local Nature Recovery Strategy when this is published,</b>
6	<b>Policy MC1: Impact of development proposals on the public highway network:</b> The proposed amendments are supported and welcomed – as provide more clarity on the measures that should be introduced in Wallingford town centre to reduce congestion, improve air quality and promote active travel as an alternative to the private car, in line with the priorities set out in the Local Transport and Connectivity Plan.	Noted	
7	<b>Paragraphs 9.3.5, 8.3.13 and 9.3.20.</b> The draft plan should be based on the latest version of the National Planning Policy Framework (NPPF), published in December 2023 (see paragraph 1.1.5). The supporting text also refers to the 2019 version of the NPPF and relevant paragraph numbers. Some of the references to relevant supporting strategies or plans are also out of date (e.g. South Oxfordshire Core Strategy).	Noted	References have been changed <b>throughout</b> the plan
8	<b>Paragraph 2.4.3</b> also needs updating to reflect the latest status and preparation of the Minerals and Waste Plan (see comments from the minerals and waste planning team overleaf).	Noted	This reference has been changed as requested.
9	It would be helpful to the readers of the plan to have a table of contents and a list of objectives and policies, with page numbers.	Noted	These have been included
10	Comments from Climate Action	We agree the Climate emergency is a	Para 2.3.1 sentence added <b>Wallingford Town Council declared a climate emergency in May 2020, we expect that</b>

	<b>Plan vision:</b> We note that one of the most pressing issues for communities in Oxfordshire is addressing the climate emergency. We suggest that this issue should be considered a strategic priority for planning all development in Wallingford and be included in the plan vision.	critical matter and the whole plan seeks to ensure that change in Wallingford is sustainable and pro-active.	<b>development proposals will have regard the relevant parts of the town strategy.</b>
11	<b>Plan objectives and policies:</b> We note the use of plan objectives and plan policies but would point out the potential for confusion amongst readers of the document due to the overlap between objectives and policies and their labels. For example, in chapter 3, there are objectives HD01 to HD04, with policies HD1 to HD4. The objectives (e.g. HD04) are not related to the policies (HD4).	Noted	
12	We welcome the plan objectives (specifically WNP03 and HD01) and the plan policies (specifically WS1 and HD2) which cover new development construction standards. We would like to encourage the Town Council to consider promoting a ‘fabric first’ approach to insulation and energy standards in new developments, which ensures that the most cost effective and appropriate actions to mitigate climate change are taken first.	Noted	The building regulations set the requirements for construction standards. They should not be repeated in the neighbourhood plan.
13	We welcome the fact that the Town Council has considered climate resilience as an important element of sustainable design (policy HD2).	Noted	
14	We would encourage the Town Council to consider the benefits of ‘enhancing the biodiversity of existing and future green and blue infrastructure’ in relation to its importance to carbon capture (in chapter 9).	Noted	
15	<b>Comments from Waste Management</b> The comments we made previously to the 2021 Wallingford Neighbourhood Plan still apply and remain relevant for the neighbourhood plan review.		
16	The revised plan should make specific reference to the principles of the circular economy (as set out in Oxfordshire County Council Climate Action Framework) to guide the provision of community spaces in the plan area, which would help reduce waste and build community cohesion through assets such as community fridges, shared space, refill stations and food growing opportunities etc (also see <a href="https://www.oxfordshire.gov.uk/residents/environment-and-planning/waste-and-recycling/oxfordshire-recycles/keep-items-circulation">https://www.oxfordshire.gov.uk/residents/environment-and-planning/waste-and-recycling/oxfordshire-recycles/keep-items-circulation</a> ).	Noted These are generally not planning matters for a neighbourhood plan. Relevant items have been included	
17	<b>Comments from Public Health</b>	Noted.	

	We note the amended reference to the 2021 Census which would not have been available when the neighbourhood plan was originally adopted in 2021. Some of the key findings from the 2021 Census are noted in the consultation document. These include Wallingford's ageing population and the figures for people working from home. These highlight the need for the plan to focus on the needs of elderly people (such as building lifetime homes, providing accessible services and providing ample resting points along active travel routes).		
18	<b>Chapter 2 - Strategy for Wallingford:</b> While we largely support the policies focusing on new housing, more emphasis needs to be made on specific aspects which help to mitigate the impacts of climate change and improve the health and wellbeing of residents. These include the strategic positioning of tree planting along active travel routes, separating vehicular traffic from non-motorised users with vegetation/trees, and the role of trees and residential dwellings. From a climate action perspective, trees mitigate against flooding, provide a cooling/shading effect in heatwaves, and promote biodiversity. They also remove pollutants from the air, such as particulates from cars, and have even been associated with reduced crime and antidepressant use.	Noted. The Green Network includes public footpaths and bridleways used in Active Travel. Wallingford town centre is constrained by historic street layout with no opportunities for street trees in footways already too narrow for people to pass each other safely.	
19	We support the inclusion of public rights of way and the desire to enhance the public rights of way (PRoW) network through wildlife corridors etc. A focus should be placed on ensuring that routes are well signed so to encourage residents to use them. It will also be important that PRoW networks are protected from disruption or unnecessary changes where new development is approved.	Noted This is a county council matter.	
20	We welcome the aims of the Wallingford green network, in particular that it will enhance the connections with new allotments and community food growing areas. We did spot a potential typo on map 7, which shows a plan of the green network, currently entitled 'Map 76'.	Noted	Resolved
21	<b>Chapter 6: Employment &amp; Economy:</b> The increase in homeworking since the covid-19 pandemic has also brought a need for a shift of focus towards more centralised workspaces, with town	Noted	

	centre 'hubs' becoming important for those who may find remote working challenging. We acknowledge that local employment is referenced in chapter 6, and it is supported that employment opportunities should enable people to work locally wherever possible, including home/hybrid working.		
22	We note the identification of major employment sites, such as the Hithercroft Industrial Estate, having unsatisfactory active travel connections into and out of Wallingford, and strongly support modal shift from the private car to walking and cycling for the employees at these sites. Infrastructure improvements must also be accompanied by adequate wayfinding, and support from the businesses themselves to create workplace active travel plans. These can be achieved with the support of Oxfordshire County Council.	Noted The new bus service linking Highcroft to Hithercroft is up and running. Walking routes are available.	
23	Where any sites allocated for employment uses have not yet been developed, we recommend that planning conditions are included which assign developer funding specifically to developing and enhancing active travel infrastructure.	All sites have been developed	.
24	<b>Chapter 7: Town Centre, Retail and Tourism:</b> Whilst we acknowledge the need to continue providing some car parking, Wallingford town centre must also be a space where people can feel safe and comfortable to walk, wheel and cycle. Improvements to bus services should also be used to encourage sustainable access to Wallingford town centre for those who live further out of town.	Noted New bus services are due to start imminently.	
25	<b>Chapter 8: Movement &amp; Connectivity:</b> We have the following comments on the policies in this section.  <ul style="list-style-type: none"> <li><b>Policy MC2: Access to Public Transport:</b> We support the promotion of sustainable travel specifically through developer contributions towards new and improved bus services. This is especially vital in new developments as these are often further out of town and would contribute towards making sustainable travel the mode of choice.</li> </ul>	Noted OCC should highlight these requirements when commenting on individual planning applications.	
26	<ul style="list-style-type: none"> <li><b>Policy MC3: Cycling:</b> We strongly support this policy and wish to add that cycle storage should be located conveniently to make cycling the most convenient choice for people.</li> </ul>	Noted	<b>Ch 8</b> Add to text: New residential development proposals should provide covered, secure, <b>convenient</b> and safe cycle storage for each home
27	<ul style="list-style-type: none"> <li><b>Policy MC5: Vehicle Parking.</b> We agree that there should be no pavement parking, as this impedes those engaging in active travel to utilise the full width of footways.</li> </ul>	Noted	

28	<ul style="list-style-type: none"> <li>• <b>Policy MC7: Provision of Electric Vehicle Charging Points.</b> We support the provision of EV charging points – this will help to future-proof all new developments and encourage the shift away from combustion engine vehicles.</li> </ul>	Noted	
29	<p><b>Chapter 9: Community Facilities &amp; Infrastructure:</b> It is acknowledged that a range of issues and challenges are faced on assets to Wallingford, such as active travel provision, healthcare, education and other community facilities.</p> <ul style="list-style-type: none"> <li>• <b>Policy CF1: Protecting Existing Facilities</b> as an important mechanism for protecting the town.</li> </ul>	Noted	
30	<ul style="list-style-type: none"> <li>• <b>Policy CF5: Health and Wellbeing Service Provision:</b> We strongly support this policy although noting that some of the wording in CF5.2 might have been misaligned with the text box. We also welcome the fact that the Town Council will work with relevant organisations to ensure that medical facilities in the town are closely aligned with its expanding population.</li> </ul>	Noted	
31	<p><b>Chapter 10: Community aspirations:</b> Within the list of community aspirations, we largely agree with all points raised, in particular the need to reduce through-traffic and general congestion/road safety in relation to the school commute. Similarly, we agree that the usage of e-scooters should be accompanied by policies which take into account their safe use.</p>	Noted Information about e-scooters has been removed as they are not legal vehicles outside pilot areas.	
32	<p><b>Paragraph 7.7.4:</b> OCC Property owns and manages only part of the former playing field land on the west side of St George’s Road. OCC Property wishes to make clear that part of the land is now used as a school car park and another part is used as grassland. The car park is owned by the Merchant Taylor Trust and used by Wallingford School, whilst the residual grassed area is owned by OCC. There is therefore no connection between the school car parking area and the land that is held by OCC for the public benefit of the local community.</p>		<p><b>Ch 10.</b> Para 7.7.4 altered to:  <b>Land at St Georges Road and Millington Road which is owned by the Merchant Taylor Trust has been adapted by Wallingford School to create the Walter Bigg Car Park for school staff. Adjacent land has been planted up to enhance biodiversity. The adjacent former sports-pitch/playing field area, which is owned by Oxfordshire County Council, is retained as green</b></p>

			<b>space for the public benefit of the local community.</b>
33	The key issues are: <ul style="list-style-type: none"> <li>• Pavement parking is an enforcement issue and not suitable for inclusion as a policy.</li> <li>• The car and cycle parking standards in the neighbourhood plan need to be consistent with Oxfordshire County Council's standards as outlined in '<i>Parking Standards for New Developments</i>' (2022).</li> </ul>	Noted	
34	<b>Policy MC2: Access to Public Transport</b> MC2.1 Consideration should be given to removing the reference to 400m. CIHT guidance (Buses in Urban Developments) makes reference to less than 400m based on the frequency of bus service.	Noted Wallingford does not have urban style bus services.	
35	Have these specs been approved by OCC's public transport team? Please clarify.	Para 8.3.4 These specs are part of the made WNP and no objections have been raised to them.	
36	Text should read ' <i>new developments should provide cycle parking in line with OCC standards</i> '. The current text '50% of the expected workforce' is not in line with OCC standards (i.e. <i>OCC Parking Standards for New Developments</i> – tables 1 and 5).	Agreed	Change MC3 text to: <b>New residential development proposals should provide covered, secure, convenient and safe cycle storage for each home. Commercial development proposals should provide covered, secure and safe cycle parking in line with OCC standards.<sup>2</sup></b>
37	What is meant by 'ground level fixings'? All cycle parking should be in line with paragraph 4.11 of ' <i>OCC Parking Standards for new Developments</i> '.		Para 8.3.10 changed to: <b>8.3.10 Residents, commuters and visitors need safe and convenient travel options to access all local services and facilities, they should also be encouraged to use low emission vehicles and non-car-based travel. Any new cycle parking</b>

<sup>2</sup> <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/PARKINGS.PDF>



			should be in the form of Sheffield Hoops in accordance with OCC parking standards <sup>3</sup> .
38	<b>Policy MC5: Vehicle Parking</b> MC5.2 As comment above, can pavement parking be enforced by OCC	Agreed	Reference to pavement parking has been removed.
39	Paragraph 8.3.13 Update NPPF paragraphs, from 105 and 106 to 111 and 112.		References changed.
40	<b><u>Comments from Education (Access to Learning)</u></b>  <b>Paragraph 9.2.29</b> states that ‘Wallingford has two primary schools and a junior school: Fir Tree Junior School, St John Primary School and St Nicholas CoE Infants.’ As a matter of accuracy, this should say “ <i>one primary school, one infant school and one junior school</i> ”. St John’s is a full primary school, offering provision from Reception to Year 6, while St Nicholas currently offers places from Reception to Year 2 (as well as a nursery class), and Fir Tree offers places from Year 3 to Year 6. However, as stated, in the longer term it is planned that both St Nicholas and Fir Tree will become primary schools, providing places from Reception to Year 6, which would facilitate expansion of primary education capacity within Wallingford by up to 2 forms of entry.	Noted	Para 9.2.29 changed: <b>Wallingford has one infant school, one primary school and a junior school: Fir Tree Junior School, St John Primary School, and St Nicholas CoE Infants</b>
41	<b>Paragraph 9.2.31</b> states that Wallingford School is ‘operating at its capacity of an intake of 190 pupils per year and is heavily over-subscribed with a waiting list.’ To ensure children are able to attend their local school, Wallingford School is in the process of expanding. Since 2019 its admission number has been 216 and, following the completion of additional permanent accommodation, the school’s admission number increased again in 2022 to 242. The school’s total capacity is now 1,515 places.	Noted This comment does not make clear whether the expansion will provide additional capacity or will just help to meet existing demand.	Para 9.2.30 changed <b>Wallingford is a hub for secondary education, with children from surrounding villages as well as Wallingford attending Wallingford School, is being expanded to provide an intake of 242 pupils per year from 2023/24 and is over-subscribed with a waiting list.</b>
42	<b><u>Comments from Minerals and Waste Planning</u></b>  We are pleased to see reference to the Oxfordshire Minerals and Waste Local Plan as well as the recognition of the minerals safeguarded area.		Change para 1.1.5 ..... <b>Whilst it has regard to the Oxfordshire Minerals and Waste Local Plan (Part 1) the Plan does not deal with minerals and waste issues, nor any nationally-significant infrastructure.</b>

New residential development proposals should provide covered, secure, convenient and safe cycle storage for each home. Commercial development proposals should provide covered, secure and safe cycle parking in line with OCC standards.<sup>33</sup>

	<p>We suggest the following amendments.</p> <p>1.1.5 The <u>Wallingford Neighbourhood is Plan (WNP)</u> is in accordance with government guidance in the Planning Practice Guidance. It is in accordance with policies in the National Planning Policy Framework (NPPF), and all references within the Wallingford Neighbourhood Plan refer to the <del>December</del> <u>September</u> 2023 version of the NPPF. It is in general accordance with strategic policies in the <u>adopted</u> South Oxfordshire Local Plan 2035. <del>The Wallingford Neighbourhood Plan (WNP) is consistent with the strategic policies of this Local Plan. The WNP has also had regard to the Oxfordshire Minerals and Waste Local Plan (Part 1) in its preparation, and does not cover any mineral or waste issues. Core Strategy (2017) and Local Plan, the Plan does not deal with minerals and waste; The WNP does not cover any or nationally significant infrastructure.</del></p>		
43	<p>2.4.3 Oxfordshire County Council is <del>responsible for preparing the a new</del> Oxfordshire Minerals and Waste Local Plan <del>which to provides the</del> minerals and waste <u>strategy and</u> planning polices <u>to guide development within the county and proposals for the period to 2031</u>. <del>The current</del><u>new</u> Local Plan <del>was</del> <u>is</u> in two parts: Part 1 – Core Strategy, <u>which</u> was adopted in 2017; and <del>work has commenced on</del> Part 2 – Site Allocations. <del>Work has ceased on the site allocations and work has commenced on a new Minerals and Waste Local Plan. Upon adoption, it will replace the Minerals and Waste Part 1: Core Strategy. It will replace the existing Minerals and Waste Local Plan1 which was adopted in 1996. The Core Strategy contains policies to safeguard land within and in the</del> WNP area will be <del>safeguarded</del> <u>safeguarded</u> for minerals <u>and safeguard existing waste facilities</u>.</p>		<p>Change to <b>2.4.3</b>  <b>Oxfordshire County Council is preparing the Oxfordshire Minerals and Waste Local Plan which provides the minerals and waste strategy and planning polices to guide development within the county. The current Local Plan is in two parts: Part 1 – Core Strategy was adopted in 2017; and Part 2 – Site Allocations Work has ceased on the site allocations and has commenced on a new Minerals and Waste Local Plan. On adoption it will replace the Minerals and Waste Part 1 and form part of the development plan. The Part 1 document contains policies to safeguard land in the WNP area for minerals and also safeguards existing waste facilities.</b></p>
<b>Comments submitted by SODC Planning Policy Officer (Neighbourhood) received 25 March</b>		<b>WTC response</b>	<b>Change to plan</b>
<b>Ref 1.</b> Update all NPPF references in the document to the latest version, 20 December 2023		Noted.	All references changed to <b>NPPF 2023</b>
<b>Ref 2.</b> Update plan period to 2024 - 2035		Noted	Actioned
<b>Ref 3.</b> Design. Page numbers into the footer		Noted	Actioned
<b>Ref 4.</b> AONBs to be changed to National Landscapes especially in maps and keys		Noted	Actioned

<b>Ref 5.</b> Para 1.5.2 and 1.5.3. SEA and HRA will be carried out by SODC and results published on SODC website, and sent to WTC	Noted.	
<b>Ref 6.</b> 1.1.6 delete 'this' replace with 'the'	Noted.	Once <b>the</b> Wallingford Neighbourhood Plan Review
<b>Ref 7.</b> See Ref 4 above Map 1 legend to be changed	Noted	Actioned
<b>Ref 8.</b> Map 2 is unclear, low resolution	Noted.	Actioned
<b>Ref 9.</b> WS1.1 (b) Policy WS1. Whilst this policy remains largely unchanged, two bullet points have been added under WS1.1(b). It is unclear why these bullet points have been added under (b), when it appears that they stand alone as policy statements and are not reliant on WS1.1(b). In relation to the first added bullet point, the wording is overly restrictive. Setting the threshold at 'ensuring development reduces', is not consistent with national or local policy. Paragraph 159 of the NPPF sets out that new development should be planned for in ways that can help to reduce greenhouse gas emissions; and Policy DES8 in the South Oxfordshire Local Plan requires proposals to demonstrate that they are seeking to limit greenhouse emissions. As drafted this policy statement is largely generic in nature and lacks local specificity to Wallingford. Our recommendation would therefore be that this element of the policy is either removed to avoid unnecessary duplication, or modified to align with national and local policy.  The second bullet point under part (b) of Policy WS1 is also overly restrictive. Development can only be required to mitigate its own impact, whereas this part of the policy is asking development to improve the health and wellbeing of the community. As drafted it is not clear how a proposal would be able to improve the health and wellbeing of the community, therefore we suggest that the policy wording is modified to encourage development to consider health and wellbeing. It may also be useful to expand the supporting text to explain the local context and what specific measures would be encouraged.	Noted: These bullets amplify what is considered well-designed and sustainable development. Both bullets modified as suggested but it is open to developers to have their own ideas about how their proposals affect health and well-being and climate change.	<b>Ch 2</b> focus well designed, sustainable development within the built-up area of Wallingford, and:  bullet 1  <b>ensure that development limits greenhouse gas emissions by appropriate measures, such as through its location, orientation, and design, and identifies suitable areas for renewable and low carbon energy sources and sustainable water use</b>  bullet 2 <b>considers improvements to the health and wellbeing of the community, to minimise vulnerability and improve resilience, e.g. links with Green Network, provision of open spaces accessible for all, and provision of facilities for people to meet outdoors.</b>
<b>Ref 10.</b> 2.5.13 This paragraph states that potential sites are shown in Map 3, however Map 3 has been updated in the proposed review plan and refers to the Built-up Area Boundary Map. Since sites are referred to in the text, we would recommend that a map illustrating the sites discussed is included in the plan review and that the reference to Map 3 is corrected in this paragraph.	Noted.	Reference to Map 3 deleted  <b>Three sites (Site B, Site E and Habitat site) added to the new Map 3 Built-up Area Boundary map</b>
<b>Ref 11.</b> WS2.4 care facility site. This facility is already considered through planning. Recommend removing this bullet to avoid confusion	Working Group noted this comment. The current	

	<p>permission is only in outline. We propose to retain this bullet point because evidence of the type of care facilities needed will not be available until later in 2024 when SODC complete their Housing Needs Assessment.</p>	
<p><b>Ref 12.</b> The North-Western section of the boundary (corresponding to Site B) excludes sections of land along its Western edge. We assume that the rationale behind this is to prevent the inclusion of the site’s green buffer/parcels of greenspace within the settlement boundary. Whilst in principle excluding green buffers/parcels is fine, this approach does not appear consistent with the methodology set out in paragraph 2.7.5. Therefore we would recommend that the methodology used to define the settlement boundary is reviewed and if necessary amended, for example through adding a bullet point in paragraph 2.7.5 such as: • ‘Green buffer and land which falls outside of the curtilage of houses’</p>		<p><b>Ch 2</b> Text added: at 2.7.5 <b>Green buffer and land which falls outside of the curtilage of houses</b></p>
<p><b>Ref 13.</b> 2.5.18 In December 2023 updated Housing Delivery figures were published by the Department for Levelling Up, Housing and Communities showing that in the period 2019-2022, SODC delivered 3312 homes against a requirement of 2136. We recommend that the information in this paragraph is therefore updated to reflect the latest figures and ensure accuracy and clarity. Further information on the latest figures this can be found here.</p>	<p>Noted:</p>	<p><b>Ch 2</b> new text at 2.5.18 replaced former text <b>In December 2023 updated Housing Delivery figures were published by the Department for Levelling Up, Housing and Communities showing that in the period 2019-2022, SODC delivered 3312 homes against a requirement of 2136.</b><sup>4</sup></p>
<p><b>Ref 14.</b> Section 2.9 older and disabled people housing</p>	<p>Noted. Waiting for the SODC review of older</p>	

<sup>4</sup> [Housing Delivery Test: 2022 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

	and disabled people housing to be published.	
<b>Ref 15.</b> 3.1.7 This paragraph discusses the Traditional Shopfront Design Guide published in 1995, and its importance in determining planning applications. We suggest reference is also made to the South Oxfordshire and Vale of White Horse Joint Design Guide, adopted in June 2022, as this has a section on traditional shopfront design and a series of design principles.	Agreed.	<b>Ch 3 3.1.7 text amended</b> <b>The Traditional Shopfront Design Guide<sup>5</sup> published by SODC in 1995 is an important document in determining planning applications. The document sets out the general principles and details of good design. It provides guidance on the retention of historic shopfronts and on the design of new shopfronts in the Town Centre. The South Oxfordshire and Vale of White Horse Joint Design Guide (published June 2022) also has a useful section on traditional shopfront design.<sup>6</sup></b>
<b>Ref 16.</b> HD3 This policy has been added and focuses on shop fronts and signs, making reference to the South Oxfordshire Traditional Shop Design Guide. This guide was published in 1995 and whilst still used when determining planning applications, there are other considerations, including the South Oxfordshire and Vale of White Horse Joint Design Guide (adopted June 2022) which has a section on traditional shopfront design. Guidance documents are not part of the development plan and therefore policies can only say that development proposals should have regard to them. Policy HD1 in the WNP already sets out that new development should be of a high quality and sustainable design, and part 2 of this policy makes specific reference to new development having regard to the South Oxfordshire and Vale of White Horse Joint Design Guide. If you feel that a reference to the Traditional Shopfront Design Guide is missing, we suggest amending Policy HD1. For example, part HD1.2 could be amended to say: 'New development should have regard to the process and principles of the South Oxfordshire and Vale of White Horse Joint Design Guide and where appropriate, the Traditional Shopfront Design Guide, the detailed information in the Wallingford Character Assessment outside the Historic Core (Appendix E), the Wallingford Conservation Area Appraisal and the Winterbrook Character Assessment.	Agreed.	<b>Ch 3</b> <b>New text HD1.2: New development should have regard to the process and principles of the South Oxfordshire and Vale of White Horse Joint Design Guide and where appropriate, the Traditional Shopfront Design Guide, the detailed information in the Wallingford Character Assessment outside the Historic Core (Appendix E), the Wallingford Conservation Area Appraisal and the Winterbrook Character Assessment.</b>  <b>HD3 Traditional Shopfronts policy deleted</b>  <b>New HD3 policy is Avoidance of Light Pollution</b>
<b>Ref 17.</b> Views and Vistas map 5		<b>Ch 4</b>

<sup>5</sup> [https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/05/Shopfront\\_Design\\_Guide-SPG.pdf](https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/05/Shopfront_Design_Guide-SPG.pdf)

<sup>6</sup> [Built form \(southoxon.gov.uk\)](https://www.southoxon.gov.uk)

		<b>This map is redrawn with addition of view cone from the Motte towards the Berkshire Downs</b>
<b>Ref 18.</b> Map of employment areas to include Verda Park	Agreed.	<b>Relevant maps showing this employment area are annotated Verda Park</b>
<b>Ref 19.</b> 6.4 The text explaining that Policy EE1 has been removed from the WNP review because Site C has been developed is useful at this stage, it may be worth expanding the text slightly to avoid confusion with the policy numbering. We suggest the following: ‘Former Policy EE1: Allocation of Employment Land at Site C has been removed from the WNP 2024 Review because Site C has been developed and is now Verda Park’	Agreed.	<b>Ch 6</b> New text <b>Former Policy EE1: Allocation of Employment Land at Site C has been removed from the WNP 2024 Review because Site C has been developed and is now Verda Park</b>
<b>Ref 20.</b> Policy EE1 We recommend that an accompanying map showing safeguarded sites is included alongside the policy to improve clarity.		<b>Map 8 caption change to:</b> <i>Enlargement of Proposals Map showing the employment areas and safeguarded sites ref: Policy EE1. Ayres Yard in the north, and Verda Park and Hithercroft Industrial Estate in the south-west. The Primary Shopping Area (shown for reference) is also a major area of employment but this is primarily for retail and is considered separately.</i>
<b>Ref 21.</b> Map 7/6 confused numbering	<b>Map 7 is correct number</b>	
<b>Ref 22.</b> Table 3 We would recommend supplementing the information in this table with more recent data from the Town Centres and Retail Study (December 2023) and the Vale of White Horse & South Oxfordshire Household Survey (July 2022) which provides useful data relating to vacancy rates and floorspace. Table 4.1 on page 25 of the <a href="https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2024/01/Town_Centres_Retail_Study_Dec_2023.pdf">https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2024/01/Town_Centres_Retail_Study_Dec_2023.pdf</a> shows figures on the sector composition of Wallingford town centre in addition to vacancy rates. Page 423 of the <a href="https://www.southoxon.gov.uk">Vale of White Horse and South Oxfordshire Town Centres and Retail Study (southoxon.gov.uk)</a> provides figures on town centre floorspace in Wallingford with a comparison against UK averages.	Agreed.	<b>Ch 7</b> New Table 3 and Table 4 added from the SODC recommended links  New text: <b>7.3.4 The shopping experience in Wallingford is currently concentrated on the historic Market Place, St Mary’s Street, St Martin’s Street, Castle Street, the High Street, and St Peter’s Street. These streets have the highest concentration of retail floorspace. Due to the historic street pattern and tight urban grain, there are not considered to be significant opportunity sites in the town centre.</b>

	<p><b>7.3.5 Wallingford accommodates a good proportion of comparison goods operators, which means that the percentage of units dedicated to this use is above national average level (33.8% compared to 26.9% nationally) and the average evident across South Oxfordshire and Vale of White Horse’s principal centres (29.4%). There has been a small increase in the proportion of commercial units dedicated to comparison goods use since 2013 (when such uses accounted for 32.7% of all units). These retailers, which are located throughout the town centre, include those which serve the day-to-day needs of the local community (such as chemist, bookshop, clothing stores and charity shops) as well as more specialist retailers (including antique shops, homewares, interior designers)<sup>7</sup>.</b></p> <p><b>7.3.6 Table 3 shows convenience goods at 6.2% which is below the national average. In 2005 the Waitrose store relocated from 48 St Martin's Street to 1 St Martin's Street, and continues to provide a key anchor store in the town centre. There are eight other town centre shops providing convenience goods. Outside the town centre Wallingford's convenience offer is now augmented by the Lidl store at Lupton Road on the Hithercroft industrial estate, and provides a net tradeable area of 2,125 sqm. This store generally satisfies the convenience goods floorspace for the Plan period up to 2035. In addition, there are three small convenience shops outside the town centre: Asda at the Esso</b></p>
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<sup>7</sup> [https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2024/01/Town\\_Centres\\_\\_Retail\\_Study\\_Appendices\\_Dec\\_2023.pdf](https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2024/01/Town_Centres__Retail_Study_Appendices_Dec_2023.pdf)

	<p>garage on Station Road, Londis on Sinodun Road and Nisa on St John's Road.</p> <p>7.3.7 Wallingford is considered to be a vital and viable town centre and characterised by its independent offer. This reflects the specialist nature of some retailers and the commercial stock, which is traditional in character and largely of limited scale. Wallingford's independents include antique shops, bookshop, and gift shops. The town's principal national multiple retailers are Waitrose, Greggs, Boots, and Clarks. These are augmented by several charity shop operators. Retail and service uses are generally distributed evenly across the centre. The Waitrose store to the north of the centre acts as a key anchor and the Market Place is also a key focus of activity. Wallingford has a relatively low vacancy rate.</p> <p>7.3.8 The South Oxfordshire Market Town Health-check carried out in 2022 identified 68 service (leisure, retail and financial and business) operators in Wallingford town centre. The 31 leisure service operators account for 23.8% of all units, and 23.6% of the total stock of retail floorspace. There is a diverse range of retail and service operators that provide a particularly strong food and drink offer, which is almost wholly comprised of independents with a few national chains. The hospitality offer in the centre also includes The George Hotel, which is a 16th century coaching inn with 39 rooms.</p> <p>7.3.9 The Corn Exchange is situated on Market Place and performs an important role in providing a cultural offer within the town. It is multi-purpose venue which acts as a theatre,</p>
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		cinema, comedy and music venue. The venue seats 176 people and acts as an important anchor for the evening economy.
<p><b>Ref 23.</b> Policy TC3 This policy has been modified to reflect the current situation surrounding the site. However, the opening element of the policy could be modified to be more positive and concise. We recommend that the first line of this policy be amended to improve clarity: ‘Any pProposals for the demolition redevelopment of the existing building and the redevelopment of the Regal Cinema site should will be supported where they:’ The second bullet point addresses the location of the site within the Conservation Area. However, in doing so it oversimplifies policy considerations for proposals within a Conservation Area. We would recommend the removal of bullet point 2 to avoid oversimplifying the policy considerations set out in Policy ENV8: Conservation Areas of the SODC Local Plan; or direct reference to Policy ENV8 should be made in this policy. The third bullet point refers to important views, however Policy HA3: Views and Vistas in the plan, already addresses views across the plan area and sets out how development proposals should consider them. The NPPF sets out that plans should avoid unnecessary duplication, therefore we would recommend that this bullet point is deleted. Ref. Section/Policy Comment/Recommendation We recommend bullet point 4’s reference to ‘up to date standards’ is replaced with ‘Oxfordshire County Council’s standards’: • Provide car and cycle parking in accordance with up-todate relevant Oxfordshire County Council’s standards Whilst development should maintain existing connections, it may not always be possible to achieve enhancements. Therefore, we recommend that bullet point 5 is amended to address this and improve clarity: • Maintain and where possible enhance Ensure that walking routes and connections across the site and to the town centre are maintained and enhanced In the final bullet point, to make sure that the right type of archaeological investigations take place we suggest ‘appropriate’ in inserted between ‘that’ and ‘archaeological’. This will likely be something determined on a case by case basis and this means the policy has flexibility with the type of investigations that take place.</p>	Agreed.	<p><b>Ch 7</b> TC3.1 text amended: <b>Proposals for the redevelopment of the Regal Cinema site will be supported where they:</b></p> <ul style="list-style-type: none"> <li>• <b>Seek to include some community facilities where practical and viable</b></li> <li>• <b>Ensure that the new building is sympathetic to its important setting in the historic town centre and conservation area, and has regard to Policy ENV8 of the South Oxfordshire Local Plan.</b></li> <li>• <b>Provide car and cycle parking in accordance with Oxfordshire County Council standards</b></li> <li>• <b>Maintain and where possible enhance walking routes and connections across the site and to the town centre</b></li> <li>• <b>Ensure that appropriate archaeological investigations are carried out</b></li> </ul> <p>Also deleted last sentence in para 7.4.3.</p>
<p><b>Ref 24.</b> Policy MC1. Planning policies can only require development to mitigate its own impacts, it is not appropriate to require development to address other existing or wider issues. MC1.1 has been modified and text has been added saying that proposals should identify the way they would respond positively to air quality issues and to improve health outcomes and quality of life. As drafted it is not clear how a proposal would be able to identify improvements to health outcomes or quality of life, therefore we suggest that the policy wording is modified to encourage development to consider health outcomes and quality of life. It may also be useful to expand the supporting text to explain what health outcomes and quality of life considerations the policy is concerned with. MC1.2 – This bullet point has</p>	Agreed. Amended policy MC1.2 deleting reference to pavement parking	<p><b>Ch 8</b> New text MC1.4(f) <b>the approach to parking provision should consider guidance from the OCC's Street Design Guide <sup>8</sup>. Due consideration will be given to local levels of car ownership and the safety and free flow of all road users including active travel.</b></p>

<sup>8</sup> <https://mycouncil.oxfordshire.gov.uk/documents/s66322/Street%20Design%20Guide.pdf>

<p>added text regarding pavement parking, our comments on Policy MC4 also apply here and we recommend this point is removed from the policy. MC1.4(f) – It is not clear what is meant by ‘the treatment of pavement and parking’. It appears that the policy is attempting to deal with the maintenance of parking, which is outside the remit of neighbourhood plan policies. We recommend this element of the policy is deleted.</p> <p>MC1.4(g) – This added bullet point is attempting to deal with matters outside of the control of neighbourhood planning policies. We recommend this bullet point is deleted and you contact Oxfordshire County Council outside of the neighbourhood plan process if you wish to discuss signage and road markings. This could be something moved to the Community Aspirations section of the plan.</p> <p>MC1.4(h) – This is a new bullet point referring to ‘electric bicycles’, ‘e-scooters’ and ‘Invalid carriages’, however it appears to be dealing with issues outside of the controls of neighbourhood planning policies. It is also a bullet point duplicated in MC4. Our comment on Policy MC4 explains why this bullet point should be deleted, and the reasoning remains the same here as it is in comment 25</p>		<p>deleted MC1.4 (g)</p> <p>Added text to 8.3.10 <b>Any new cycle parking should be in the form of Sheffield Hoops or similar in accordance with OCC parking standards<sup>9</sup>.</b></p>
<p><b>Ref 25.</b> Policy MC4 MC4.1(b) - The requirement in MC4.1(b) to ensure that routes are not ‘blocked or encroached’ would fall outside of the remit of a neighbourhood planning policy issue, and would instead be a highway maintenance matter. We would therefore recommend this be removed to ensure clarity and consistency with the NPPF, we suggest the wording should be amended to: ‘provide safe and convenient routes for cyclists and pedestrians, both within the development, and including links to rights of way and other off-site walking and cycling routes where relevant, and especially safe routes to the schools. Where provision is made it needs to ensure that the route is always kept clear for this purpose and not blocked or encroached;. This may include the use of shared surfaces in line with current DfT guidance;’</p> <p>MC4.1(c) - National guidance sets out that policies need to be clear and concise. Within MC4.1(c) some additional wording has been added, however it does not bring clarity and is repetitive. We recommend that the text is reverted to how it is in the made WNP.</p> <p>MC4.1(f) - We recommend that the following reference- ‘ends pavement parking except for where permitted’ be removed, as this wording appears to suggest that some form of pavement parking may be acceptable, whereas this is an Oxfordshire County Council issue. The wording in the made WNP is</p>	<p>Agreed.</p>	<p><b>Ch 8</b></p> <p>Deleted ‘ends pavement parking except for where permitted’ MC4.1(f) amended text <b>be served by an adequate road network which discourages pavement parking and can accommodate traffic without creating traffic hazards or damage to the environment and references ‘Active Travel England’ July 2020 and forthcoming, and ‘Inclusive Transport Strategy’ DfT November 2020<sup>10</sup> to enable all highway users to be safely accommodated particularly within the constraints of the historic town centre;</b></p> <p>new text for <b>MC4.1(h) make adequate provision for those with impaired mobility and parking for</b></p>

<sup>9</sup> <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/cyclingstandards.pdf>

<sup>10</sup> ‘Active Travel England’ July 2020 <https://www.gov.uk/government/publications/active-travel-england-framework-document-for-working-with-department-for-transport>. ‘Active Travel Strategy’ Oxfordshire July 2022 <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/ActiveTravelStrategy.pdf> ‘Inclusive Transport Strategy’ DfT November 2020

<p>more appropriate. Further information about Oxfordshire County Council’s parking regulations can be found here.</p> <p>MC4.1 (f) – The second half of this bullet point now also makes reference to the Government Framework document ‘Active Travel England’ and Oxfordshire County Council (OCC) ‘Active Travel Strategy’. However the purpose of these documents does not align with the policy requirement. It is overly restrictive to ask development proposals to refer to these documents, as that is not the role of these documents. The Government Framework document ‘Active Travel England’ sets out the broad government framework within which Active Travel England and Department for Transport operate, covering responsibilities, governance and accountability, and the day-to-day relationship between these bodies. The OCC Active Travel Strategy sits as a supporting document to the Local Transport and Connectivity Plan (LTCP), expanding on measures needed to create successful cycle and walking networks, and provides an action plan to improve walking experience and meet the cycling targets OCC has set. It sets out within it that: ‘Policies and actions contained in the LTCP and the Active Travel Strategy will also need to be embedded in a wide range of documents, from our own Local Cycling and Walking Infrastructure Plans, area transport strategies and maintenance procedures to strategic and planning documents adopted by or in collaboration with other local authorities – including the Oxfordshire Plan 2050, Local Plans and neighbourhood plans.’ We would recommend expanding on the relevance of these documents within the supporting text of the plan, rather than in a policy. If there are policies and actions contained within the OCC Active Travel Strategy which you think are relevant to Wallingford and which you would like to incorporate into the plan, we would be happy to discuss this further with you. Our recommendation is that MC4.1(f) remains unchanged from the made WNP.</p> <p>MC4.2 - MC4.2 is a new bullet point making reference to ‘electric bicycles’, ‘e-scooters’ and ‘Invalid carriages’, however it appears to be dealing with issues outside of the controls of neighbourhood planning policies. Information about e-scooters is set out on the Thames Valley Police website, this explains the current situation with E-scooters, and how E-scooters can only be used in approved areas. The Highway Code explains that if an electric bike meets certain requirements, it is classed as a normal pedal bike and therefore would be captured when referring to bikes/bicycle generally throughout the plan. The final addition to the policy regarding ‘Invalid carriages’ is repeating the more general point made in MC4.1(h). Some additional wording could be added to MC4.1(h) if this is an issue you would like to particularly address, our suggest would be: ‘make adequate provision for those with impaired mobility and parking for disabled people, specifically including wheelchair and mobility scooter users;’</p>		<p><b>disabled people, specifically including wheelchair and mobility scooter users;</b></p> <p><b>MC4.2 deleted</b></p> <p><b>New text 8.3.1 Most new commercial developments and housing developments will, for the foreseeable future, generate additional vehicular traffic, which will impact on the local environment generally. Traffic congestion and noise can affect people’s mental well-being, and cause drivers to become stressed, tired, irritable and angry which can lead to more road accidents. Breathing in polluted air over a long period of time can increase the risk of heart and lung diseases (Asthma and COPD) and lung cancer. There is also evidence linking air pollution to increased risk of dementia, low birth weights and diabetes. Breathing in polluted air over a shorter period, can also lead to symptoms such as eye, nose, and throat irritation<sup>11</sup>.</b></p>
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<sup>11</sup> OxonAir <https://www.oxonair.uk/about-air-quality/health-advice>

<b>Ref 26.</b> Policy MC5.1 – The text ‘see table 8.3.13’ that has been inserted in the first sentence is suggesting this table contains Oxfordshire County Council parking standards. Whereas, paragraph 8.3.13 explains that County Councils standards should be applied, however where it is practicable the standards in this table should apply. To avoid confusion we suggest ‘see table 8.3.13’ from the first sentence is deleted. MC5.2 - Our comment relating to MC4.1(f) also apply here, we recommend the removal of MC5.2 as controlling parking falls under the remit of Oxfordshire County Council and is not a neighbourhood planning policy matter. Further information about Oxfordshire County Council’s parking regulations can be found here	Noted	<b>Ch 8 Reference to table deleted</b>  <b>First sentence of 5.2 is deleted:</b> There should be no pavement parking except where permitted. The rest of the policy is already in the Made Plan.
<b>Ref 27.</b> Policy CF3: Local Green Spaces and the associated supporting text should be reinserted into the plan review in order to maintain the Local Green Space designations. The WNP review will supersede the Wallingford NDP 2021, therefore any policies and allocations not carried forward will no longer apply.	Agreed.	<b>Ch 9</b> <b>Policy CF3 and supporting text reinserted.</b>
<b>Ref 28.</b> Appendices. Make sure they are up to date	Agreed.	Actioned

**Table 3. Submissions from statutory bodies: Thames Water, Historic England, Natural England, ONR, Berkeley Homes (Oxford & Chiltern) Limited, L&Q Estates, Boyer Planning on behalf of Croudace, Nicholas King Homes, David Wilson Homes**

Ref	Submissions from statutory bodies	WTC/WNP working group response	Changes to WNP Review
1	<p><b>Thames Water received 6 February</b></p> <p>As you may be aware, Thames Water are the water and sewerage undertaker for the District and hence are a “specific consultation body” in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012.</p> <p>We have the following comments on the consultation document: <b>Policy Omission - Water Supply and Wastewater/Sewerage Infrastructure</b></p> <p>Thames Water consider that there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan.</p> <p>Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> <p>Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:</p> <p>a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”</p> <p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites,</p>	<p>Noted. Agreed these are all important matters.</p> <p>However, these comments apply to all developments and are not specific to Wallingford. It seems more appropriate that the South Oxfordshire Local Plan includes appropriate policies and advice in relation to these matters. SOLP policy INF1, INF4 and EP4 and their supporting text appear to cover the matters raised and do</p>	<p>No changes</p>

<p>the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network.</p> <p>The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply infrastructure;</li> </ul>	<p>not need to be repeated in the WNP.</p>	
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<ul style="list-style-type: none"> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements:  <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/water-and-wastewater-capacity">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/water-and-wastewater-capacity</a></p> <p>In light of the above comments and Government guidance we consider that Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:</p> <p><b>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</b></p> <p>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p> <p>Water Efficiency/Sustainable Design</p> <p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but</p>		
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<p>also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:  <a href="https://www.thameswater.co.uk/Be-water-smart">https://www.thameswater.co.uk/Be-water-smart</a></p> <p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.</p> <p>In light of the above, we consider that the Neighbourhood Plan should include the following policy:</p> <p>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</p> <p>Comments in relation to Flood Risk and SUDS</p> <p>The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other</p>		
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<p>than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</p> <p>Development Sites</p> <p>There are no new site allocations for us to comment upon. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development</p>		
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	<p>together with the anticipated phasing.</p> <p>We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link:  <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/water-and-wastewater-capacity">https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/water-and-wastewater-capacity</a></p> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p>		
2.	<p><b>Historic England by email 28 March</b></p> <p>We welcome the production of this neighbourhood plan review and are pleased to see that the historic environment of your parish features throughout.</p> <p>Your neighbourhood area does contain a number of designated heritage assets including significant archaeology, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy contained in your review. However, we do wish to re-iterate our previous substantial comments (2020) below which commented on the previous plan where they remain relevant; in relation to high significance of the historic environment especially archaeology , heritage assets including high potential for the unknown and non-designated and site allocation, including the need for robust management plans.</p> <p>Significance  <i>It is Historic England's view that Wallingford stands out as a focus of nationally significant heritage assets, particularly in relation to the value of the remains of the Alfredian burh as evidence of the resurgence of the Kingdom of Wessex in the late 9th century and the</i></p>	<p>Noted. Agreed to include paragraph on Significance.</p> <p>Agreed to insert para on CIL-funded work to repair and maintain heritage at risk</p> <p>Other advice noted.</p>	<p>Ch 4 additional text:</p> <p><b>Significance</b>  <b>4.1.2 It is the view of Historic England that Wallingford stands out as a focus of nationally significant heritage assets, particularly in relation to the value of the remains of the Alfredian burh as evidence of the resurgence of the Kingdom of Wessex in the late 9th century, and the unification of Wessex and Mercia in the early stages of creation of the English nation. The town and Norman castle were also significant during the Norman Conquest and the post-Conquest period as a key point in the network of Norman Royal power bases.</b></p>

<p><i>unification of Wessex and Mercia in the early stages of creation of the English nation. The town and Norman castle were also significant during the Norman conquest and the post conquest period as a key point in the network of Norman Royal power bases.</i></p> <p><i>Heritage @ Risk However, sadly, it is both the scheduled monuments of the burh (town) at the Bull Croft and Kine Croft and the castle that have been identified as 'at risk' monuments on Historic England's Heritage At Risk register (which is formally recognised by DCMS and the ONS). We feel the consideration of these as requiring a particular focus in the Section of heritage policies is helpful in providing recognition of the need to ensure that development of the area helps to sustain the significance of its most precious heritage assets.</i></p> <p><i>Historic Environment Policies ..policy should support the principal of proposals that can be shown to have benefits for the management and improvement of facilities within these key public open spaces, including supporting enhanced management of the heritage assets, which might include management of foliage, consolidation and conservation of earthworks and masonry elements of ruins and improved public access and interpretation. We would also support this being identified in a schedule of appropriate and necessary CIL funded works that would offset the anticipate additional impacts on these public spaces and heritage assets resulting from the town's growth and increased population.</i></p> <p><b>Site Assessments and Allocations</b></p> <p><i>With regard to site assessments and allocations, we support the inclusion of additional policy requirements to protect the sites of archaeological interest within Site E to guide consideration of reserved matters and, in particular, the requirement for a management plan for open space that will retained to preserve the Bronze Age ring ditch sites in order to prevent development of scrub (policy WS2.2(h)). Development of this site is anticipated to result in loss of considerable areas of other non-designated archaeological remains, including prehistoric trackways, field systems and evidence of settlement and the justification of this loss on the grounds of public benefits that would be delivered should include the potential to provide enhancement of the site's heritage assets for the benefit of the community through interpretation. This is necessary to ensure that the conflict between the proposed development and conservation of the site's archaeological interest is avoided or minimised and that the potential for the development to contribute to local character is appropriately realised. Whilst the incorporation of the remains into an area of landscaped public open space would clearly be desirable it is necessary to guide proposals to</i></p>		<p>Additional text Ch 10</p> <p><b>10.1.6 We will seek to support enhanced management of the heritage assets, which could include management of vegetation, consolidation and conservation of earthworks and masonry elements of ruins, public access and interpretation. This would involve identifying a schedule of appropriate and necessary CIL-funded works and management plans that would offset the anticipated additional impacts on these public spaces and heritage assets resulting from the town's growth and increased population.</b></p>
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<p><i>avoid landscaping works that could harm the non-designated site - which would not otherwise be protected through scheduled monument status, for example.</i></p> <p>Additional Advice</p> <p>It is good to see the inclusion of the management Shopfront signage/lighting.</p> <p>We also offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets. Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.</p> <p>It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.</p> <p>The government's <a href="#">National Planning Practice Guidance</a> on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a <i>neighbourhood</i> scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <a href="https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7">https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7</a></p>		
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<p>The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/</a></p> <p>If you have not already done so, we would recommend that you speak to the staff at local authority archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway (<a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a>). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.</p> <p>Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: <a href="http://mycommunity.org.uk/funding-options/neighbourhood-planning/">http://mycommunity.org.uk/funding-options/neighbourhood-planning/</a>.</p> <p>The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: <a href="#">HE Advice Note 1 - conservation area designation, appraisal and management</a>, and here: <a href="https://historicengland.org.uk/images-books/publications/understanding-place-historic-">https://historicengland.org.uk/images-books/publications/understanding-place-historic-</a></p>		
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<p><a href="#">area-assessments/</a>. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.</p> <p>The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Wallingford. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place – for instance through the use of appropriate materials, and attractive design.</p> <p>Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: <a href="https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces">https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces</a>.</p> <p>You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality’s website here: <a href="http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/">http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/</a>.</p> <p>Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and</p>		
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<p>their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <a href="https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/">https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/</a></p> <p>If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the “Traffic in Villages” toolkit developed by Hamilton-Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.</p> <p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.</p> <p>Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <a href="https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/">https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/</a></p> <p>The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:</p> <p>HE Advice Note 2 - making changes to heritage assets: <a href="https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/">https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/</a></p> <p>HE Good Practice Advice in Planning 3 - the setting of heritage assets: <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></p> <p>If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:</p> <p>HE Advice Note 3 - site allocations in local plans: <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans</a></p> <p>HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a></p>		
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	We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.		
3.	<b>Natural England by email 28 March</b> Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.	Noted. We are grateful for the additional information in the Annex	No changes. Chapter 5 already includes references to Natural England publications and the biodiversity data of relevant sites and habitats held by TVERC.
4.	<b>ONR by email 5 March</b> With regard to planning application Wallingford Neighbourhood Plan, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	Noted	No change
5.	<b>Berkeley Homes by email 1 April</b> As part of the Review Consultation for the Wallingford Neighbourhood Plan (NP) and following your consultation event that we attended on Friday 23rd February 2024, I am writing to you to set out our proposals for the site currently referred to as 'The School Land' on Site E, for your consideration, shown edged red on the appended plan. Planning Background The outline consent provided for 502 dwellings together with land set aside for a new primary school. However, in November 2019 Oxfordshire County Council served a Notice of Land Requirement on the owners of Site B to deliver a 2-form entry primary school. In September 2023, work on our site at Winterbrook (Site E) commenced, and in accordance with the S106 agreement, all requirements for a school on this land fell away. We have been approached by Wallingford Medical Centre who are seeking to expand from their current premises, located just to the North of our site. The existing Medical Centre is in urgent need of larger premises due to the growing population within Wallingford, as well as the age and condition of the existing facility. Having been extended 3 times in the last 30 years to keep up with the growing demand, in 2020 it was deemed unviable to deliver a further approved extension, due to the age of the building and the associated cost of its expansion. As it is no longer viable to expand the existing facility, the Medical Centre are looking for land to provide a new, larger facility. The Medical Centre require up to 1.5 acres of the school land parcel to deliver its new medical facility. This area allows for any future expansion of the facility, as necessary. Proposals We have continued discussions with the Medical Centre and have agreed to work in	Noted	Ch 2. New policy WS2.2 and text <b>The 2.2ha of land previously identified for a school on Site E is allocated for a medical centre, with the possibility of some housing, which should ensure that specialist housing needs for older and disabled people locally have been met. Any proposals for the site should:</b> <ul style="list-style-type: none"> <li>• <b>Set out the rationale for the size and design of the proposed medical centre demonstrating how long term needs have been considered</b></li> <li>• <b>Provide adequate vehicle and cycle parking for staff and patients</b></li> <li>• <b>Ensure that access to the site encourages both walking and cycling</b></li> <li>• <b>Demonstrate the viability of the medical centre and the scale of housing proposed.</b></li> </ul> <b>New text:</b> <b>2.6.2 The land allocated for a school is no longer required for that purpose, and Policy WS2.2 now allocates that site for a medical centre. During spring 2024, GPs from Wallingford</b>



<p>partnership to achieve planning permission, ensuring that their costs are kept to a minimum where possible, to help in delivering the facility for the wider community.</p> <p>In order to secure the delivery of the Medical Centre on this land, it is necessary for further residential development to come forward on the remaining 3.5 acres of land. As such, we are proposing between 60-70 new homes to ensure that it is viable for Berkeley to transfer the land to the Medical Centre, helping to secure its future, in addition to generating additional Council Tax revenue and S106 &amp; CIL Receipts for the local authority.</p> <p>We understand that Policy WS2.3 of the Wallingford Draft Neighbourhood Plan (Reg 14) allocates the entirety of 'The School Land' for medical use only. Whilst we support the proposed use on this site, it is not viable for the whole 5 acres to be allocated as medical use as further residential dwellings are required in order to support delivery of key infrastructure needed to allow delivery of the Medical Centre.</p> <p>We have discussed initial proposals with South Oxfordshire District Council, who support the principle of both residential and medical use on this site. Following engagement with the District Council and the Medical Centre, we will be preparing a full detailed application to submit later this year, to bring this site forward and enable the Medical Centre to secure their funding as soon as possible.</p> <p>Conclusion</p> <p>Following our engagement with both the Medical Centre and the local authority we would like to take this opportunity to highlight 'The School Land' as suitable for residential development in addition to the Medical Centre allocation, and propose that Policy WS 2.3 is revised accordingly.</p> <p>A mixed-use allocation will protect part of the site for medical use ensuring that the land is suitably available when the Medical Centre comes forward. The inclusion of additional homes on the 'School Land' will ensure that the Medical Centre is viable, supporting its delivery.</p> <p>With the above in mind I hope that you are able to support our proposed allocation for this land to include housing, in order to enable the delivery of a new medical centre for the area.</p>	<p><b>Medical Practice are working with Berkeley Homes to prepare a joint planning application for the site.</b></p> <p><b>2.6.3 It is essential that the design of the new medical centre is sufficient to meet the long-term needs of the local area. The design should allow space for a hub facility for the delivery of medical and health services for people in this part of South Oxfordshire and for possible expansion to meet longer term needs.</b></p> <p><b>2.6.4 The Wallingford Medical Practice is a hub facility with doctor and nurse practitioners, and related community medical services and primary care providing for both Wallingford and many surrounding villages. The current medical centre is at capacity, and the GPs say they will be unable to meet the medical needs of the committed new homes in Wallingford and surrounding areas on their existing site. There is a clear and urgent need for the medical practice to expand with space for more consulting rooms and for supporting services. 'Relocation Rationale' provided by the GPs giving justification and rationale for the relocation is attached at Appendix G.</b></p> <p><b>2.6.5 The growing population within the catchment is leading to increased pressure on existing health facilities. The practice is already 32% undersize compared to NHS space criteria, 46% undersize compared to space criteria for the new NHS structure, and 59% undersize when known future housing development is accounted for. Plans include a future patient capacity of 22,500, which will only just meet the planned population growth within the catchment.</b></p>
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			<p><b>2.6.6 Policy WS2 recognises that housing allocations meet the housing requirement for Wallingford as advised by SODC and set out in the Local Plan 2035, and that it exceeds the local requirement as identified in the Wallingford HNA. WTC is conscious of the requirement in Local Plan Policy H13 and seeks to meet this by requiring that any future housing on the land previously allocated for a school at Site E should in the first instance seek to meet needs for specialist housing for older people. In addition, we indicate that the care facility on Site E should be designed to take account of specific needs of the elderly and disabled as identified in the SODC housing assessment.</b></p>
6	<p><b>From Stantec UK on behalf of L&amp;Q Estates received 4 April. Appendices available</b></p> <p>We write on behalf of our Client, L&amp;Q Estates Limited ('L&amp;Q Estates') in response to the Wallingford Neighbourhood Plan Review ('WNPR') (Regulation 14 Consultation). L&amp;Q Estates, part of the L&amp;Q Group, operate as a stand-alone business that acquire, develop, and promote land for various types of projects facilitating much-needed housing and commercial development across the UK. Our Client controls Land north of Wilding Road, Wallingford ('the Site') which presents a significant opportunity for high-quality new homes, sustainability located on the edge of one of the South Oxfordshire's long-standing Market Towns. A Site Location Plan is provided at Appendix 1 to this representation. Working jointly with Croudace Homes, L&amp;Q Estates have previously promoted the proposal through the adopted South Oxfordshire Local Plan 2035. This representation is accompanied by a vision document for an ambitious urban extension referred to as Wallingford Northern Gateway (Appendix 2). This vision document provides further details illustrating how the Site can deliver a high-quality residential-led development, comprising of circa 1,500 new homes, including affordable housing, as well as strategic infrastructure, including a possible new school, which would be of significant benefit to Wallingford's current and future residents. The Site is identified as reference SH787 within the Housing and Economic Land Availability Assessment 'HELAA' (January 2024) published as part of the South Oxfordshire and Vale of White Horse Joint Local Plan ('JLP') Regulation 18 Part 2 consultation. Notwithstanding the</p>	Noted	<p>The land at Site A referred to here was not allocated for housing in the current Wallingford NP.</p> <p>It is safeguarded by Oxfordshire County Council for mineral extraction.</p> <p>Wallingford is not required to provide any land for housing under SOLP 2035.</p> <p>The L&amp;Q Estates land in Site A was considered thoroughly during the site selection process carried out by WNP Steering Group while preparing WNP 2021. We consider that assessment is still valid because the land is:</p> <ul style="list-style-type: none"> <li>• Not suitable</li> <li>• Not achievable</li> </ul> <p>Due to:</p> <ul style="list-style-type: none"> <li>• harm to adjacent North Wessex Downs National Landscape and its setting</li> <li>• mineral safeguarding from OCC</li> </ul>

<p>comprehensive opportunity, our Client’s Site can come forward independently as a sustainable, smaller scale opportunity for development at Wallingford. An illustrative masterplan for the Site is provided at Appendix 3 to this representation. In this regard, the Site is identified as SH602 within the HELAA. This independent opportunity was also previously promoted on behalf of our Client between 2017 and 2021 through the preparation of the now made Wallingford Neighbourhood Plan (‘WNP’). Paragraph 8 (2) of Schedule 4B (e) of the Town and Country Planning Act 1990 and Planning Practice Guidance (‘PPG’) (Paragraph 065 Reference ID: 41-065-20140306) set out the Basic Conditions that a Neighbourhood Plan must meet. These include a requirement that neighbourhood plans must be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). Paragraph 20 of the NPPF sets out the strategic matters which are expected to be addressed through policies in Local Plans. This includes, amongst others, sufficient provision for housing (including affordable housing), community facilities, and the conservation and enhancement of the natural, built, and historic environment. It is acknowledged that the Local Plan currently forming part of the development plan in this geography is the adopted South Oxfordshire Local Plan 2035. However, PPG at paragraph 009 (Reference ID: 41-009-20190509) states that although a draft Neighbourhood Plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested in cases where a neighbourhood plan is brought forward ahead of a local plan. Moreover, PPG at paragraph 084 (Reference ID: 41-084-20190509) states that policies in a neighbourhood plan may become out of date, for example, if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence. The JLP is due to be published for Regulation 19 consultation before the end of 2024, and examination and adoption during 2025. Therefore, there is a risk for the neighbourhood plan review to be out of date within a short time scale of it being made. Taking account of the above, this representation comments upon: • The timing and purpose of the WNPR; • Consistency of the WNPR with the basic conditions; • Up-to-date evidence of housing need for South Oxfordshire (and the Vale of White Horse); and • The proposed amendments to draft policies where appropriate. The structure of this representation broadly follows that of the WNPR document. Chapter 1: Wallingford The introductory chapter to the WNPR is largely unchanged, however, it is noted that sections 1.4 to 1.6 are duplicated in the tracked changes version published which is an error to be corrected in the next draft. More importantly, there does not appear to be any indications of the programme for the WNPR</p>		<ul style="list-style-type: none"> <li>• increase in traffic through Wallingford town centre</li> <li>• access from Wantage Road intrusive in landscape and no capacity</li> <li>• proposed access onto Shillingford Road involves unacceptable increase in road capacity, Shillingford bridge has one way traffic lights.</li> </ul>
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<p>or, in light of the changes proposed, its purpose. Paragraph 084 of the PPG (Ref ID: 41-084-20190509) provides guidance on when it will be necessary to review and update a neighbourhood plan. Paragraph 084 confirms that there is no requirement to review or update the neighbourhood plan yet identifies example situations for reviewing a neighbourhood plan to reduce the likelihood of the document becoming out-of-date. These include where neighbourhood plan policies conflict with a local plan that is adopted after the making of a neighbourhood plan or where neighbourhood plan policies have been in force for period of time and therefore the evidence base becomes less robust. The Modifications Statement (January 2024) confirms that the WNP was made in June 2021. The Examiner’s Report for the WNP dated 19th January 2021 at paragraph 7.29 recommends that any ‘made’ neighbourhood plan is reviewed at a time to correspond with the review of the local plan. Paragraph 7.29 goes on to state that this will ensure that the two plans remain complementary in their approaches and that it will allow the Wallingford evidence base to be reassessed and reviewed to take account of any potential readjustments in the overall delivery of housing in the town and any specific changes in the local housing needs. Furthermore, paragraph 7.146 of the Examiner’s Report provides a replacement paragraph 11.1.8 of the WNP which ties the review of any ‘made’ neighbourhood plan to the future review of the local plan. Paragraph 7.146 again sets out that this process would ensure that the different elements of the development plan were complementary. The WNPR, notably, the aims set out in paragraph 1.6.3, fundamentally overlooks the critical consideration which the WNPR should be informed by the JLP and the supporting evidence base (as referred to in more detail below). As stated above, the JLP has reached Regulation 18 stage (with consultation having closed in February 2024), and is due to be published for Regulation 19 consultation before the end of 2024, and examination and adoption during 2025. On this basis, we strongly recommend that any further progress of the WNPR should await the examination and adoption of the JLP. This should ensure that the WNPR is consistent with the intentions of paragraph 11.1.8 of the WNP document, includes policies which appropriately respond to and accord with the JLP, and meet the Basic Conditions. Moreover, paragraph 1.5.2 of the WNPR document sets out that “since there are no new allocations and limited policy changes in this 2024 Review of the WNP, the Strategic Environment Assessment is largely still relevant to this Plan”. Paragraph 1.6.1 of the WNPR document adds that a referendum may not be necessary. The supporting Modifications Statement goes further and considers that “the proposed changes constitute material modifications that do not change the nature of the Wallingford Neighbourhood Development Plan, and would require examination but not a referendum”. Paragraph 106 of the PPG (Ref ID: 41-106-20190509) highlights that there are three types of modification which can be made to a</p>		
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<p>neighbourhood plan or order. The process depends on the degree of change which the modification involves. These are: 1) Minor (non-material) modifications; 2) Material modifications which do not change the nature of the plan or order but would require examination but not a referendum; and 3) Material modifications which do change the nature of the plan or order would require examination and a referendum. We agree that the updates to the Neighbourhood Plan are material but do not generally change the nature of plan. Despite this, it is considered that the nature of the modifications proposed reinforces our comments above that progressing the review of the WNP at this stage, prior to and not in parallel with the JLP, is unnecessary. If progressed in advance of the JLP, the WNPR risks being rendered out-of-date soon after being made. Should the Town Council continue to progress with the WNPR, in its current draft form in advance of the JLP, we question whether it would meet the requirements of paragraphs 14 and 67 of the NPPF. Turning to the supporting evidence base material. It is noted that no additional evidence has been published as part of this Regulation 14 consultation. In the context of the JLP, our Client recently responded to the Regulation 18 Part 2 consultation and included a review of the JLP’s supporting housing need evidence. Further details about this are provided below as part of comments regarding Chapter 2 where Housing Need is referenced from section 2.5 of the WNPR. Chapter 2. Strategy for Wallingford Policy WS1: The Local Strategy for Wallingford: The WNPR proposes to introduce two additional policy requirements under WS1.1(b). The Modifications Statement suggests this additional information is to support sustainable development to meet net zero targets. Our client agrees with the principle of these additions but would encourage the Town Council to consider whether the additions are both clear and duplicate local or national policy requirements. We also encourage the Town Council to ensure that they have had due consideration to the Written Ministerial Statement<sup>1</sup> issued on the 13th December 2023 setting out that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures: i) development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF and ii) the additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate calculated using a specified version of the Standard Assessment Procedure. Housing Need Assessment This section of the WNPR appears to include limited changes as no updated Housing Need Assessment has been undertaken. However, text has been added (underlined below) to new paragraph 2.5.17 suggesting that there “is no requirement to allocate any</p>		
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<p>further strategic or non-strategic housing sites in the WNP. To do so would be unsustainable since a number of essential services and facilities do not have capacity to support further housing development". First, we consider that the final sentence is unsubstantiated as new development can, and often does, provide either directly or through financial contributions, additional services and facilities. Moreover, there is no new evidence published alongside the consultation to indicate what the essential services and facilities referenced are, or that the essential services and facilities referenced do not have capacity. Second, in light of the context of the emerging JLP, our Client considers that the evidence of housing need for South Oxfordshire (and Vale of White Horse) is much greater than the SODC and VOWH assessment (Joint Housing Needs Assessment November 2023). Our Client's response to the JLP Regulation 18 Part 2 consultation included a review undertaken by Stantec. Stantec's evidence is broadly consistent with the evidence base prepared on behalf of Oxford City Council (Housing and Economic Needs Assessment December 2022). Taking account of Stantec's evidence, significantly more housing provision will need to be identified through the JLP and should include additional growth at the most sustainable settlements, including Wallingford. In our opinion, the approach proposed by the JLP at Regulation 18 Part 2 stage underplays the significant housing need for the Districts and does not sufficiently consider existing exceptional circumstances to deviate from the standard method calculation. We therefore consider that the JLP does not provide a strategy to meet the area's objectively assessed needs and is therefore not positively prepared. Any changes in local housing needs, would be identified through the JLP process, thereby illustrating the importance for the WNPR to correspond with the emerging JLP policies and evidence. Last it is noted that new paragraph 2.5.1 has been moved within the WNPR, but not updated. It is unclear why. Policy WS2: The Land Allocation for Housing in Wallingford: It is noted that the proposed changes to policy WS2 now seek to allocate 2.2ha on Site E for a medical centre rather than a school. Whilst we have no specific comments about this proposed policy wording change, reference is made at paragraph 2.6.5 that plans include a future patient capacity of 22,500 which will only just meet the planned population growth within the catchment. In our opinion the new Medical 1 Written statements - Written questions, answers and statements - UK Parliament centre should seek to meet both existing and planned growth, with the potential for expansion. In this regard, 2.2ha on Site E should be a sufficient area of land to do so. Turning to education, it is noted that no new primary school provision was required at Site E. This indicates that there is sufficient primary school capacity in Wallingford to meet the needs of current planned development and potentially with some spare capacity. Nevertheless, development at North Wallingford could deliver a new primary school if required to serve the development. Policy WS3: Development Within the Built-up Area: It is noted that the</p>		
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<p>built-up area of Wallingford has been added to Map 3 and additional wording has been added to policy WS3. Our client has no comments about the area identified as the built-up area. It is however unclear why criteria WS3.2 has been added to the policy which, by virtue of its nature and title, is focused on development within the built-up area. It is also noted that additional supporting text has been added. Our Client considers that the additional supporting text to policy WS3 is unclear. For example, it is unclear what is meant at paragraph 2.7.2 regarding “applying Government advice and strategic policy”. Paragraph 2.7.2 also references the principle of settlement boundaries being consistent with the NPPF but does not make clear which part(s) of the NPPF this is referring to. We would encourage the Town Council to be clear where and how proposed changes to the Neighbourhood Plan have regard to national policies in line with 2 (a) of the Basic Conditions. Last, paragraph 2.7.3 sets out that “the Built-up area Boundary and related policies provide the basis for development management to” before listing a series of statements, including “ensure new development is sustainable”, “enable the best use to be made of existing and future services”, and “provide a useful tool to protect and preserve Wallingford’s important and sensitive setting by protecting the surrounding countryside from inappropriate development”. In our opinion, these statements are unsubstantiated, inaccurate, and inconsistent with both national policy and strategic policies. We would encourage the Town Council to reconsider the inclusion of this justification. Chapter 8. Movement and Connectivity: It is noted that paragraph 8.2.23 states that the Wallingford Air Quality Management Area (‘AQMA’) was “resolved in 2023, and continues to be monitored”. It is unclear what is meant by this sentence. In the emerging JLP, it was highlighted as part of the introductory text for proposed policy CE9 that the new Joint Air Quality Action Plan advises that the Wallingford AQMA will be revoked in the shorter term. In our opinion, this extract from the JLP is a clear indication as to why the WNPR should be conducted in parallel with the preparation of the JLP to ensure that there are consistencies. Nevertheless, our client welcomes the proposed revocation of the Wallingford AQMA and expects that the JLP, and any subsequent Neighbourhood Plan for Wallingford reflects this position. Policy MC4: Safe Active Travel: Our Client supports the principle of ensuring new developments improve connectivity and active travel. Development at North Wallingford will integrate new public open space and community infrastructure as part of a landscape-led masterplan. Regarding the proposed additional wording at MC4.1(a), the second additional bullet point is inflexible and, in our opinion, not possible for all development sites. Moreover, it is considered that this addition is inconsistent with the policy requirements of TRANS5 (ii) of the Adopted South Oxfordshire Local Plan. MC4.1(b) includes additional wording that seeks to ensure “where provision is made it needs to ensure that the route is always kept clear for this</p>		
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<p>purpose and not blocked or encroached”. Whilst our client agrees with the principle of this, it is unclear how this policy would be applied in practice. We recommend that this is not taken forward as part of any WNPR. Last, it is noted that an additional MC4.2 policy criteria has been added to the policy. However, it appears that this is a placeholder for policies that will be developed. It is not clear when this will be done and whether they will meet the requirements of the Basic Conditions. Summary National planning policy is clear that the planning system should be genuinely plan-led. Paragraph 29 of the NPPF highlights that neighbourhood planning gives communities the power to develop a shared vision for their area, and that neighbourhood plans can shape, direct, and help to deliver sustainable development. In this regard, our client supports Wallingford Town Council in having and wanting to ensure that the policies therein are up to date. However, our Client is unclear on the timing and purpose of this Regulation 14 consultation. The Examiner’s Report for the WNP made clear that a review of any ‘made’ neighbourhood plan is reviewed at a time to correspond with a review of the local plan. This consultation however gives no reference to JLP and is being brought forward ahead of progression of the JLP, including any potential updates to local housing needs. We strongly recommend that the Town Council pause the WNP review until further progress has been made on the submission and examination of the JLP, expected in 2025. Proceeding in advance of the JLP risks this review being an unnecessary process and policies being rendered out-of-date soon after being ‘made’. Our client will continue to promote Land north of Wilding Road, Wallingford for inclusion in the JLP as a flexible opportunity that can deliver early within the plan period as either a smaller, standalone, allocation or in collaboration with neighbouring land that is being promoted by Croudace Homes to form a significant and comprehensive urban extension. Wallingford is a sustainable higher-tier settlement that is appropriate for additional levels of growth, helping to meet the housing needs of South Oxfordshire and Vale of White Horse. Importantly, the Site will contribute to the delivery of market and affordable housing within South Oxfordshire, helping to meet the identified need. Development of this Site offers a number of significant benefits for the local community, including:</p> <ul style="list-style-type: none"> <li>• Being sustainably located adjacent to a first-tier settlement in Wallingford;</li> <li>• Providing approximately circa 370 new homes as a standalone opportunity or as part of a joint development opportunity with the adjoining developer (Croudace Homes) comprising circa 1,500 homes;</li> <li>• Delivery of a mix of housing types and tenure, including affordable housing provision;</li> <li>• New public open space and community infrastructure provision as part of a landscape-led masterplan;</li> <li>• The potential to provide on-site services and facilities including a primary school, local retail, and community space;</li> <li>• High sustainability standards, including use of new technologies, local materials, and imaginative architecture rooted the local vernacular; and</li> <li>• Integrated green</li> </ul>		
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	<p>infrastructure provision and at least 10% Biodiversity Net Gain ('BNG'). We trust that these representations will be taken as duly made and would welcome confirmation of receipt. Should you have any queries or wish to discuss, please do not hesitate to contact the writer.</p>		
7	<p><b>From Boyer Planning on behalf of Croudace Homes received 5 April. Appendices available</b></p> <p>INTRODUCTION 1.1 Boyer has prepared these representations on behalf of Croudace Homes Ltd ('Croudace'), in response to the Wallingford Neighbourhood Plan Review ('WNPR') Regulation 14 Consultation (February – April 2024), undertaken by Wallingford Town Council ('WTC'). 1.2 Our comments should be considered in combination with our previous submissions as part of the review of the Wallingford Neighbourhood Plan, submitted to WTC in November 2023. Scope of Representations 1.3 These representations are made with respect to the ongoing promotion of the Land West of Shillingford Road, Wallingford ('the site'), for residential-led development, over which Croudace holds a specific land interest. These representations are aligned with this land interest and address topics within the WNPR consultation, and its supporting evidence base, accordingly. 1.4 Our comments relate to the extent to which the proposed WNPR is likely to meet the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990, at this stage. In this context, our comments highlight where opportunities exist that we believe would enhance the Plan and facilitate its implementation as an effective development management tool. 1.5 In doing so, our comments also specifically highlight the opportunities that are presented by new development, specifically the proposals at Land West of Shillingford Road, Wallingford. Accordingly, the following sections of this representation are set out as follows: • Section 2: Policy Context • Section 3: Land West of Shillingford Road, Wallingford • Section 4: Review of Other Relevant Policies in the Neighbourhood Plan • Section 5: Summary and Conclusions 1.6 We trust that our comments are of assistance to the Neighbourhood Plan Steering Group ('NPSG') and Wallingford Town Council in preparing this review of the Neighbourhood Plan pursuant to the Neighbourhood Planning (General) Regulations 2012 (as amended). 1.7 Croudace would welcome the opportunity to meet with members of the NPSG and the Town Council, to set out the vision for development at the site and to listen to the views of local stakeholders, which will inform the design and vision of the proposed development.</p> <p>2. POLICY CONTEXT 2.1 Section 2 of our representations to the Wallingford Neighbourhood Plan Review Survey, submitted to Wallingford Town Council in November 2023, sets out in detail the legal and policy context in which the WNPR process is being conducted. Meeting the Basic Conditions 2.2 In summary, it remains important to note that once the</p>	Noted	<p>The land at Site A referred to here was not allocated for housing in the current Wallingford NP.</p> <p>It is safeguarded by Oxfordshire County Council for mineral extraction.</p> <p>Wallingford is not required to provide any land for housing under SOLP 2035.</p> <p>The Croudace Homes land in Site A was considered thoroughly during the site selection process carried out by WNP Steering Group while preparing WNP 2021. We consider that assessment is still valid because the land is:</p> <ul style="list-style-type: none"> <li>• Not suitable</li> <li>• Not achievable</li> </ul> <p>Due to:</p> <ul style="list-style-type: none"> <li>• harm to adjacent North Wessex Downs National Landscape and its setting</li> <li>• mineral safeguarding from OCC</li> <li>• increase in traffic through Wallingford town centre</li> <li>• access from Wantage Road intrusive in landscape and no capacity</li> <li>• proposed access onto Shillingford Road involves unacceptable increase in road capacity, Shillingford bridge has one way traffic lights.</li> </ul>

<p>Neighbourhood Plan is submitted for independent examination, under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the regulations'), it must be demonstrated that it conforms to the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 ('TCPA'). The Plan must also be legally compliant in every other respect. 2.3 Following submission, it will be the role of an Independent Examiner to consider whether the reviewed Neighbourhood Plan meets the basic conditions. In order to meet the basic conditions, the making (adoption) of the Neighbourhood Plan must (in summary):</p> <ul style="list-style-type: none"> <li>• be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;</li> <li>• contribute to the achievement of sustainable development;</li> <li>• be in general conformity with the strategic policies of the development plan; and</li> <li>• not breach, and must be otherwise compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.</li> </ul> <p>2.4 The aim of our representations is to provide commentary relating to the extent to which the WNPR is capable of meeting the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. Our view is that, in order to meet the basic conditions, it is necessary for the Neighbourhood Plan to facilitate additional residential development to meet the Town's housing needs over the plan period. Review of the Wallingford Neighbourhood Plan 2.5 The Wallingford Neighbourhood Plan (2021) ('WNP') was made as part of the District Council's Development Plan on 20 May 2021. There is no requirement to review or update a made neighbourhood plan. 2.6 However, Planning Practice Guidance ('PPG') highlights several reasons that a Qualifying Body may wish to review a Neighbourhood Plan, including, for example, where the policies in a neighbourhood plan have become out of date, where the evidence supporting those policies has become dated, or where other material considerations indicate that those policies have become out of date 2.7 Where reviewing and/or updating a neighbourhood plan, PPG is clear that: 'To reduce the likelihood of a neighbourhood plan becoming out of date once a new local plan (or spatial development strategy) is adopted, communities preparing a neighbourhood plan should take account of latest and up-to-date evidence of housing need, as set out in guidance on preparing a neighbourhood plan or Order'1 (emphasis added). 2.8 In this context, it is pertinent that Table 4 in SODC's latest Authority Monitoring Report (2021/22) (March 2023) demonstrates that, over the Local Plan period to date (2011 – 2022), the District currently has a shortfall of (negative) -874 homes completed against the cumulative annual target. 2.9 The District is therefore, to date, not meeting its overall housing needs throughout the plan period by a significant amount. The adopted Local Plan 2011 – 2035 seeks to direct development toward the most sustainable settlements in the District, including Wallingford. 2.10 Furthermore, we are concerned that</p>		
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<p>the WNP review is seeking to rely on out of date evidence. Specifically, it is problematic that the Housing Needs Assessment, which was published in 2019, has not been reviewed or updated in order to support the review of the Plan. In the intervening period, house prices have risen considerably, as have issues with housing affordability. 2.11 To undertake a review of the Plan without this updating this key evidence-base assessment undermines its validity; without understanding the contemporary context of housing need, there can be no basis upon which the Qualifying Body is capable of determining whether the original policies hold up to current circumstances. 2.12 The latest evidence of housing needs indicate that the actual housing needs of South Oxfordshire (to which the Neighbourhood Plan must have due regard) are not being provided for within the District’s current spatial strategy, and that more residential development is needed to meet assessed needs moving forward. 2.13 In addition, there is a considerable need for affordable housing and specialist housing for older persons specifically in the area that is not being met. Our concern is also that these identified housing needs are not sufficiently being addressed in the WNPR, as it required at paragraph 63 of the NPPF, and that as a result of this the plan does not meet the basic conditions. South Oxfordshire and Vale of White Horse District Councils’ Joint Local Plan 2.14 Following the submission of our previous representations to Wallingford Town Council’s Neighbourhood Plan Review Survey in November, South Oxfordshire District Council (‘SODC’) and Vale of White Horse District Council (‘VoWH’) published a Regulation 18 Preferred Options consultation on their emerging Joint Local Plan (‘JLP’). 1 Planning Practice Guidance (April 2023) Paragraph: 084 Reference ID: 41-084-20190509. 2.15 Our representations to the Joint Local Plan consultation, in summary, set out our view that the JLP Preferred Options document does not deliver an approach that adequately meets the significant needs for housing in South Oxfordshire District. Consequently, additional housing allocations are required and, in accordance with the settlement hierarchy, new homes would most sustainably be accommodated at the Districts’ Tier 1 settlements, such as Wallingford. The WNP should allow sufficient flexibility to allow for future growth to come forward at the town, as otherwise the Plan will be out of date once the JLP is adopted (anticipated late 2025).</p> <p>3. LAND WEST OF SHILLINGFORD ROAD, WALLINGFORD Site Promotion History 3.1 Croudace is promoting the Land West of Shillingford Road, Wallingford (‘the site’), for development through the Development Plan process. The site can accommodate circa 950 homes and supporting infrastructure, as set out in the Vision Document (Appendix 1). 3.2 The site is located across both the Brightwell-cum-Sotwell and Wallingford Neighbourhood Areas, as shown on Figure 1. Figure 1. Land West of Shillingford Road, Wallingford, Site Boundary 3.3 The site was submitted for consideration in the adopted South Oxfordshire Local Plan 2035</p>		
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<p>(SOLP) (adopted December 2020) and was only discounted as it was being considered as part of the Wallingford Neighbourhood Plan (WNP) (made May 2021) – to avoid duplicated work. Land West of Shillingford Road, Wallingford   Wallingford Neighbourhood Plan Review, Regulation 14 Page 8 3.4 The southern extent of the site is located within the Wallingford Neighbourhood Area. This area was considered for allocation as part of the WNP (2021) under reference ‘Site A2’, but ultimately the Plan allocated another site, known as ‘Site E’, to the south-west of Wallingford, given that on Appeal the site had been already secured outline planning permission for 502 homes, so effectively it was a retrospective allocation. It was deemed in the WNP plan-making process that the allocation of Site E fulfilled Wallingford’s housing requirement at that time. 3.5 It is clear from reading the WNPR that the NPSG has a number of aspirations for the town; for example, providing family housing, new sports facilities, accommodation for elderly residents, and so on. Croudace is of the view that its site is an obvious solution, which can provide a range of new services and facilities, but this option has to date been ignored, despite being positively viewed by the Town Council prior to the adoption of the WNP. Strategic Environmental Assessment (‘SEA’) Overview 3.6 The WNPR relies upon the assessment and conclusions of the SEA (2020). The SEA (2020) includes out-of-date information relating to the suitability of the Land at Shillingford Road (Site A2) for development. 3.7 Concerns regarding various technical elements led to the site being screened from allocation as part of the original WNP, despite it otherwise being considered favourably by the Town Council. These technical elements have been addressed, as demonstrated in the assessments previously submitted by Croudace, and the SEA (2020) must be updated to reflect this evidence. 3.8 We have serious concerns with the WNPR’s reliance upon an out-of-date and demonstrably incorrect Strategic Environmental Assessment, which exposes the plan to not meeting the Basic Conditions. The reasons for this are set out below. SEA (2020) 3.9 The SEA (2020) for the made Wallingford Neighbourhood Plan sets out several site options at paragraph 5.9; which includes sites A to E. Site A comprises two parcels of land, A1 and A2 (Croudace’s interest), which reflects the different landownerships of the site. 3.10 Sites A1, A2, and D were shortlisted for allocation, However, following comments made by Oxfordshire County Council (‘OCC’), Sites A1 and A2 were discounted from further consideration with respect to the impact they may have on the nearby Air Quality Management Area, potential highways impacts, and the location of the sites within a Minerals Safeguarding Area. 3.11 Croudace has undertaken the appropriate technical assessment of the development proposal, which demonstrates that the concerns raised by OCC do not represent a barrier to the development of the site. These assessments, which include an Air Quality Technical Report, a Highways Scoping Report, and a Minerals Safeguarding Area Assessment, have previously</p>		
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	<p>been provided to the NPSG via our representations in November 2023. Land West of Shillingford Road, Wallingford   Wallingford Neighbourhood Plan Review, Regulation 14 Page 9 3.12 On this basis, the site is appropriate for allocation in terms of the WNP’s own assessment framework and Croudace asked that it is re-considered accordingly. 3.13 The WNPR confirms at Paragraph 1.5.2 that it relies upon the conclusions of the SEA (2020). However, in accordance with national planning guidance, and to ensure that the plan meets the basic conditions, it is important that the SEA (2020) must be updated as part of this review process to reflect the latest available evidence. 3.14 In updating the SEA (2020) to support the WNPR process, it must be made clear that Site A2 would indeed be suitable for allocation, given that OCC’s concerns have been addressed per the various technical assessments that Croudace has submitted previously as part of their representations to the WNPR Survey (November 2023).</p> <p>4. COMMENTS ON THE WNPR POLICIES 4.1 In this section, Croudace’s observations and recommendations are set out in relation to the specific policies proposed (as amended) within the WNPR. We welcome the review of the neighbourhood plan; once amended in accordance with the below suggestions, the Plan should have a positive effect on planning within the Neighbourhood Area. 4.2 However, there are several flaws, conflicts, and omissions within the Neighbourhood Plan Review as currently proposed, which individually and together ensure that the reviewed Plan does not meet the ‘basic conditions’ as required by the Neighbourhood Planning (General) Regulations 2012 (as amended). 4.3 Commentary is provided within this section to identify the various issues with the reviewed Plan and our recommendations as to how such issues could be remedied to ensure that it complies with the basic conditions. In the discussion, our comments relate wherever possible to situations in which the proposed Plan conflicts directly with: • national planning policy and the advice provided by the Secretary of State; • achieving sustainable development; and/or • delivering the strategic policies of the development plan. General Commentary 4.4 There are several maps, diagrams, and drawings of Wallingford throughout the WNPR. Our recommendation is that these images should be updated to reflect the situation on the ground with respect to Site B (known as Highcroft) and Site E (known as Winterbrook Meadows), which are both currently being built-out by Berkeley. This will improve the clarity of the WNPR with respect to the extent of built form of the settlement. 4.5 Furthermore, several amendments have been made to suggest that further housing development at Wallingford would be ‘unsustainable’. Given the significant housing needs identified for South Oxfordshire District, alongside the Town’s position in Tier 1 of the settlement hierarchy, it is clear that Wallingford would be one of the most sustainable places in South Oxfordshire to accommodate new housing development. 4.6 Accordingly, those references should be</p>		
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<p>removed from the WNPR (such as, for example, at Paragraph 2.5.17), as this is entirely misleading given the highly sustainable nature of the settlement as a location for new development. Including these comments would therefore present a clear conflict with the District's Spatial Strategy as set out in the adopted Development Plan and they should be deleted. 4.7 Not only would such comments conflict with the adopted Local Plan, but they would also be inconsistent with other comments within the WNPR which indicate that there are identified needs for specific types of housing at Wallingford; in particular, family housing, affordable housing, and housing for older people. Indeed, paragraph 2.5.1 specifically identifies that 57% of residents feel that there is a lack of adequate housing within the town. To suggest that further housing development would be 'unsustainable' is entirely inconsistent with the commentary set out in the WNPR. Policy WS2: The Land Allocation for Housing in Wallingford Overview 4.8 The Land North of A4130, Wallingford Bypass ('Winterbrook Meadows'), benefits from detailed planning permission and is currently being built-out by Berkeley Homes. Retaining this policy is unnecessary, it should be removed from the WNPR to reflect the site's current status. 4.9 The NPSG may be of the view that retaining this housing allocation would afford the WNPR continued protection under national planning guidance. However, in our view this is unlikely to actually be the case, given that the site is already being delivered. Retaining the allocation may actually provide the Examiner cause for concern as to whether the WNPR meets the basic conditions, as the policy is unjustified and confusing for decision-makers. 4.10 To improve the WNPR's prospects of meeting the basic conditions, Policy WS2 must be removed in its entirety. The reasons for this are set out below. Policy WS2 4.11 Policy WS2 allocates the Land North of A4130, Wallingford Bypass, Wallingford (Site E) for development of up to 502 homes and associated infrastructure despite, the fact that the site has an extant planning permission which is currently being delivered by Berkeley Homes. 4.12 Outline Planning Permission was granted for this site in August 2019 (reference: P16/S4275/O). Reserved Matters approval was subsequently granted in November 2021 (reference: P20/S2797/RM). A Section 73 application to vary condition 1 was then approved in December 2022 (reference: P22/S2257/FUL). 4.13 Berkeley Homes has already delivered the showhomes and marketing suite at the site and the new homes are actively being marketed for sale. Indeed, as the WNPR recognises, occupancies are expected during this year. 4.14 Despite this, the WNPR seeks not only to retain the allocation of the land, but also to amend the allocation to change the requirement for a Primary School to a Medical Centre instead. In our view, retaining this allocation is unjustified and entirely unnecessary. Policy WS2 should be removed from the WNPR to reflect the situation 'on the ground'. Removing this would be consistent with the approach that the WNPR has taken with respect to Policy EE1, which has</p>		
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<p>been ‘...removed in the WNP 2024 Review because Site C has been developed and is now Verda Park’. 4.15 In its justification for the proposed change to the allocation policy, the WNPR states at paragraph 2.6.2 that ‘...the 2.2ha allocated for a school is no longer needed for that purpose’. However, the WNPR provides no evidence to substantiate this claim. Furthermore, a review of the planning history relating to the site identified no indication that this is indeed the case. 4.16 Even if there was evidence presented that the Primary School use was no longer required, the WNPR also provides no evidence to justify the proposed amendment to the allocation to include a Medical Practice. The WNPR simply refers to anecdotal indication that: ‘GPs from the medical centre are considering moving the medical centre to the allocated school site on Site E (Winterbrook Meadows)’. 4.17 Although the intention to deliver a new Medical Centre at the site may be commendable, there is simply no sound basis presented within the WNPR upon which to allocate this land for this specific purpose. In particular, given the current planning context of the site, which benefitting from extant planning permission for an alternative purpose. 4.18 In summary; there is no evidence presented to justify the allocation of the land for a Medical Centre, and the site has extant planning permission and is currently being built out. In the event that a Primary School is demonstrated to no longer be required, the use of the land should appropriately be determined through evidence-based deliberations with key stakeholders at the planning application stage. 4.19 Retaining Policy WS2 is therefore not necessary, the proposed amendments are unjustified and confusing for decision-makers, and the policy should be removed from the WNPR to ensure that the plan is capable of meeting the basic conditions. Policy WS3: Development Within the Built-up Area 4.20 Policy WS3 seeks to ensure that development within the defined Built-up Area of Wallingford is appropriate. In its original (adopted) form, the Policy reflected a reasonable approach to managing development within Wallingford. 4.21 However, the proposed addition of WS3.2 would extend the remit of this Policy beyond the defined Built-up Area of Wallingford, to effectively constrain development outside of the settlement. As a consequence, development within the Neighbourhood Area would be restricted to Previously Developed Land (‘PDL’) within the settlement boundary. 4.22 Typically, PDL developments result in predominantly flatted schemes that do not sufficiently provide for the type of family housing that is much needed at Wallingford. National policy also provides exemptions for such schemes to not contribute toward affordable housing provision, and there are limited opportunities within the defined Built-up Area to provide any suitable accommodation for older persons. 4.23 Consequently, our view is that the addition of Criteria WS3.2 effectively constrains opportunities to provide for a sufficient amount of family housing, affordable housing, and specialist accommodation for older persons. National guidance is clear that the</p>		
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<p>need for these forms of development should be specifically identified and met. The addition of Criteria WS3.2 is therefore directly in conflict with national guidance and would mean that the plan cannot meet the basic conditions. 4.24 As previously identified, some 57% of respondents to the WNP’s Housing Need Assessment identified that there should be more family housing at Wallingford. Paragraph 2.5.3 of the WNPR specifically acknowledges that there are higher levels of growth in younger families, which are quickly outgrowing their accommodation. Clearly, greater provision of family housing is required to support the longer-term growth of Wallingford. 4.25 The emerging Joint Local Plan also retains Wallingford at the highest tier of the settlement hierarchy and there is an expectation that the settlement would contribute toward sustainable development in the District as a result. Criteria WS3.2 would constrain opportunities to achieve this and would therefore be in conflict with achieving sustainable development. 4.26 Our recommendation is that proposed criteria WS3.2 is therefore removed, to ensure there is sufficient flexibility to accommodate new family, affordable, and specialist housing at Wallingford over the lifetime of the plan period. The proposed Criteria WS3.2 would also directly constrain opportunities to deliver development in accordance with proposed Policy WS4, which advocates in favour of an appropriate mix of housing types and sizes. 4.27 Alternatively, it may be appropriate to amend the criteria to support appropriate development at sites that are ‘adjacent to’ the settlement edge, providing that these support the vision of the neighbourhood plan and conform with other policies within the WNPR. 4.28 Furthermore, Croudace considers that the addition of this policy criteria fundamentally changes the relationship that this policy has with a substantial portion of the Neighbourhood Area and would therefore constitute a material amendment that does change the nature of the plan. As a result of this proposed amendment, the WNPR would in our view be required to undertake an Examination and Referendum before it could be ‘made’. Housing for Older and Disabled People 4.29 Section 2.9 ‘Housing for Older and Disabled People’ represents a new section of supporting text within the WNPR. Paragraph 2.9.1 notes that the Neighbourhood Plan Steering Group has undertaken a review of potential need and supply for the ‘immediate local area centred on Wallingford’, which is undefined, concluding that there ‘may’ be a shortfall by 2031. 4.30 The assessment of housing needs for older persons is notably absent from publication, meaning that the evidence is not capable of being reviewed. This represents a serious omission which should be rectified via an additional Regulation 14 consultation in order for the document to be appropriately considered by interested stakeholders. 4.31 Notwithstanding the omission of this evidence, the WNPR is clear that there is likely to be a shortfall in provision of housing for older persons within the proposed lifetime of this plan. On the basis of an identified shortfall in this type of housing, in the WNPR’s own evidence,</p>		
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<p>the plan must seek to allocate housing for older persons during the plan period. 4.32 The NPPF is clear, at paragraph 63, that: ‘Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes)...’ (emphasis added). Land West of Shillingford Road, Wallingford   Wallingford Neighbourhood Plan Review, Regulation 14 Page 14 4.33 In the absence of any allocations for housing for older people, the WNPR cannot be considered to have had regard to national policy, nor can it be considered to contribute to sustainable development. If the WNPR does not seek to allocate land for this type of housing, it cannot therefore be considered to meet the basic conditions. 4.34 Housing with Care, or indeed more traditional forms of Care Homes, are land uses that are capable of being provided as part of a proposed development at the Land West of Shillingford Road, Wallingford. Allocation of residential-led development at this site could therefore assist in meeting the identified need for Extra-Care (C2) housing at Wallingford during the WNPR period. Chapter 8 – Movement and Connectivity Policies 4.35 Croudace welcomes the proposed amendments throughout Chapter 8 of the WNPR. Croudace is committed to delivering several Active Travel improvements as part of the proposed development at Land West of Shillingford Road, which will assist in prioritising pedestrian and cycle travel through to the town centre. 4.36 However, our view is that the new Policy MC1: Impact of Development Proposals on the Public Highway Network, Criteria at MC1.4(g) and MC1.4(h), would be more appropriately incorporated within the supporting text to assist in explaining the policy intentions. As currently formulated, these new additions do not comprise policy requirements themselves and should not therefore be included within the policy text specifically. 4.37 Similarly, the proposed addition at Policy MC4: Safe Active Travel, Criteria MC4.2 does not comprise a policy requirement as currently drafted and would more appropriately be located within the supporting text to the policy. 4.38 Furthermore, the proposed amendment to Policy MC5: Vehicle Parking, Criteria MC5.2, is not clear in its stated intention. As proposed, the amendment appears to seek to regulate vehicular parking within the Neighbourhood Area, which is beyond the scope of the Neighbourhood Plan. If the intention is to remove the content of Criteria MC5.2, this should simply be deleted. Chapter 9 – Community Facilities and Infrastructure 4.39 Proposed new text at paragraph 9.2.12 rightly notes that the draft ‘...South Oxfordshire Leisure Strategy indicates that a 3G pitch should be built in the western area of the district to increase capacity for football and rugby, together with another pitch for hockey’. An updated Playing Pitch Strategy, which arrives at this conclusion, is currently at consultation. 4.40 The WNPR</p>		
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<p>also states, at paragraph 9.2.12, that the Neighbourhood Plan Steering Group would like these new pitches to be located in Wallingford, at the Sports Park. Policy CF2.2 is proposed to be amended to include support for new pitches to be provided at the Sports Park, but only with regard to hockey and football provision. 4.41 However, there is no specific land allocated for this purpose and there is no evidence of a specific commitment to providing these pitches from a representative of the Sports Park. In order to deliver these new pitches, it may be necessary to allocate land elsewhere within Wallingford instead and the policy should be flexibly worded to allow for other locations</p> <p>5. CONCLUSION 5.1 Croudace welcomes the review of the Wallingford Neighbourhood Plan. We recognise that neighbourhood planning can allow local communities and stakeholders, of which we are a part, to play a meaningful and positive role in influencing development areas. 5.2 However, we have indicated that several flaws and omissions are present within the WNPR (2024), which both individually and together leave the plan exposed to failing to meet the basic conditions. Our representations have set out several recommendations that should, in our view, be included within the WNPR (2024) to ensure that the plan is capable of progressing toward adoption. 5.3 Croudace considers that there are several flaws, omissions, and conflicts presented within the WNPR as currently proposed which means that the plan is exposed to failing to meet the basic conditions. In summary, these concerns relate to;</p> <ul style="list-style-type: none"> <li>• the reliance on outdated evidence within the WNPR, such as the Housing Need Assessment and the Strategic Environmental Assessment, which in our view must both be updated in order for the plan to meet the basic conditions.</li> <li>• the plan is currently set to constrain the sustainable growth of Wallingford, via the introduction of Policy Criteria WS3.2, which provides no flexibility for the settlement to accommodate additional sustainable development as part of the Joint Local Plan process. As a result, the WNPR is likely to become out-of-date upon the adoption of the JLP and this new criteria should be removed.</li> <li>• retaining Policy WS2: The Land Allocation for Wallingford is unjustified and unnecessary. As currently formulated, we are concerned that an Examiner would view the policy as failing to meet the basic conditions. The policy should be removed to avoid confusion for decision-makers.</li> <li>• the proposed amendments to the WNPR do not provide for a sufficient amount of family housing, affordable housing, and specialist accommodation for older persons, and as a result fail to comply with national policy. Sufficient flexibility must be allowed for within the WNPR to provide for these types of development.</li> </ul> <p>5.4 Several suggestions have been made within our representations to assist the NPSG in resolving these problems. Our firm view is that the WNPR should not be progressed further until the Housing Need Assessment and Strategic Environmental Assessment have been updated appropriately, and that the evidenced needs for family, affordable, and specialist forms of</p>		
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	<p>housing are properly considered (or at least sufficient flexibility is introduced to the WNPR to allow for their development where appropriate). 5.5 Croudace would welcome engagement with the Neighbourhood Plan Steering Group and Wallingford Town Council to discuss the various benefits that could be delivered for the Town as part of the proposed residential-led development at the site.</p> <p>5.6 These representations, in combination with the representations submitted previously to the Wallingford Neighbourhood Plan Survey, have established that the site is available for development immediately to support the longer-term housing needs of Wallingford, it is a suitable location for residential development, and the proposed development is achievable within the emerging WNPR's plan period. 5.7 Croudace would welcome the opportunity to clarify any of the matters raised in these representations with the Neighbourhood Plan Steering Group and Wallingford Town Council should this be required or provide further information if it would be useful. We would also welcome the opportunity of engagement with respect to the vision for development at the site moving forward.</p>		
8	<p><b>From Turley on behalf of David Wilson Homes received 4 April</b></p> <p>REPRESENTATIONS TO THE REVIEW OF THE WALLINGFORD NEIGHBOURHOOD PLAN: REGULATION 14 CONSULTATION ON BEHALF OF DAVID WILSON HOMES DAVR3006 We are writing on behalf of David Wilson Homes (DWH) in relation to the Review of the Wallingford Neighbourhood Plan Consultation: Regulation 14 consultation document. These representations have been submitted within the context of DWH's land interests at 'Hithercroft Farm, Wallingford' (herein referred to as 'the Site') that we consider is a suitable and deliverable site for residential development for up to 245 new market and affordable homes, and has been promoted to the emerging Joint Local Plan on the basis of the above development capacity. Wallingford is a highly sustainable settlement and DWH consider that this Site is the only realistic option available to support the sustainable growth of Wallingford on account of the designations which apply elsewhere around the town, such as the National Landscape designation to the north, flood risk areas to the east and the existing developments to the west which have created a defensible edge to Wallingford. These representations examine relevant policies, appendices and evidence base documents forming part of the Submission Draft Neighbourhood Plan, highlighting issues to be addressed, and inconsistencies with National and Local Planning Policy, including emerging proposals of South Oxfordshire District Council. Review of the Neighbourhood Plan and its</p>	Noted	<p>This representation refers to land known as Site D, which was assessed during the preparation of the current Wallingford NP and not allocated.</p> <p>Wallingford is not required to provide any land for housing under SOLP 2035.</p> <p><b>P18/S2506/O</b> February 2018 was refused planning permission for these reasons: 1. The proposed development fails to achieve acceptable standards of accessibility and connectivity. It would result in an isolated, unsustainable development which is poorly connected to the town of Wallingford and has inadequate access to facilities and services. It would consequently not reduce the need to travel nor manage patterns of growth to make the fullest possible use of walking and cycling for both residents and employees and would be</p>

<p>Purpose DWH recognise the role of Neighbourhood Plans in facilitating the involvement of local communities in shaping the growth of their towns and villages, and enabling Neighbourhood plan policies to support the delivery of sustainable development in line with local needs and aspirations. The ‘made’ WNP was prepared to align with the strategic policies contained within the South Oxfordshire Local Plan 2011-2035 that was adopted in December 2020. Whilst we recognise that the RWNP has been published for consultation, so far as we can establish, there is no need, for the document to be updated. There has been no significant change in circumstances since the original Plan was made. In fact, we note that the District Council is in the process of preparing a Joint Local Plan (with the Vale of White Horse District Council) to cover the period to 2041. That document is still in the process of being prepared and it is currently the subject of a number of outstanding objections, including in relation to the spatial strategy and quantum of growth being planned for. Although there is the potential that the Joint Local Plan may evolve as it progresses, our view is that the adoption of that document would represent the sort of changing circumstances which would warrant the Neighbourhood Plan being updated. We consider the preparation on the RWNP is premature given the early stage of the Joint South Oxfordshire and Vale of White Horse Local Plan (JLP) that include new strategic policies for growth, particularly at the most sustainable settlements within the Districts, like Wallingford. The adoption of the RWNP before any meaningful progress has been made on the strategic policies or housing requirements for the authority as a whole (which is considered advisable within the PPG) may render the RWNP out-of-date upon the adoption of the JLP (as discussed at paragraph 13 of the Framework). A more robust approach would be for the RWNP to come forward concurrently with, or after, the JLP, ensuring its emerging policies align with the strategic policies of the BP as required under the Framework, providing an element of future-proofing and longevity to the RWNP. The adopted Local Plan Housing Requirement The adopted SODC Local Plan identifies through Policy H3 (Housing in the Towns of Henley-on-Thames, Thame and Wallingford) a minimum housing requirement of at least 1,070 dwellings to be delivered at Wallingford. In contrast, we note that the made Neighbourhood Plan contains policies and allocations in relation to up to 502 dwellings at ‘Site E’ and Policy WS2, rather than the requirement in Policy H3 of the Local Plan. Policy MC6: Cholsey and Wallingford Railway Corridor We note that this policy is not proposed to be modified through this consultation, but that it continues to express the requirement that land immediately to the west of the existing railway line, 10m in width, as shown on the Proposals Map shall be protected from built development to facilitate the provision of commuter train services from Wallingford Station, and to provide an enhanced walking and cycling route. The land promoted by DWH is located entirely to the west of this railway line</p>	<p>heavily reliant on the private car. The proposal therefore fails to accord with policies CSM1 and CSWAL1 of the South Oxfordshire Core Strategy 2011, policies D1 and T1 of the South Oxfordshire Local Plan 2011, the National Planning Policy Framework (in particular paragraphs 102-103) and the National Design Guide.</p> <p>2. The application fails to demonstrate that residential development together with employment uses could be adequately accommodated on the site whilst achieving a high-quality place created of good design and amenity for residents, with appropriate landscaping and public amenity space. In addition the application fails to include sufficient information to fully assess the impacts of the proposals on the existing trees on the northern boundary of the site, or the vegetation on the south western boundary for the proposed access roundabout onto the A4130, and therefore fails to demonstrate the protection of important landscape features and provide a development integrated into the landscape. Therefore, the proposed development would conflict with policies CSEN1 and CSQ3 of the South Oxfordshire Core Strategy and policies C9, D1 and G2 of the South Oxfordshire Local Plan 2011 and the National Planning Policy Framework.</p> <p>3. The submitted application has failed to provide sufficient information to fully assess the impacts of the proposals on the highway network in relation to the junction capacity modelling to ensure that the development will not cause a detrimental impact upon the highway network,</p>
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<p>and could play an essential role in ensuring that this pedestrian and cycle link could be provided. DWH’s proposals for this site have also been designed to ensure that a 10 metre strip is provided for and accommodated as required by Policy MC6. DWH are willing to engage with the Neighbourhood Plan Group to discuss how the proposed corridor can be delivered as part of the wider development of the site to deliver this aspiration within the Neighbourhood Plan. Conformity with Basic Conditions Having set out the above specific policy objections, we therefore assess the Plan against a number of the “basic conditions” (see paragraph 8(2) of Schedule 4B to the TCPA 1990 and the Planning Practice Guidance). 8(2)(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan A draft Neighbourhood Plan only meets the basic conditions if, inter alia, “having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order”: paragraph 8(2)(a) of Schedule 4B TCPA 1990. A central flaw in the draft NP is that there is no certainty at this stage that the Plan meets the assessed housing needs arising in the area over the Plan period. This is contrary to the policy approach set out in the NPPF and the PPG paragraphs set out above. The PPG makes clear that: “A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against 3 the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, upto-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.” Paragraph: 009 Reference ID: 41-009- 20190509 There is no documentary evidence that the latest housing need evidence was considered in the preparation of this RWNP, although clearly such matters could be relevant as the PPG explains. At this present time it remains uncertain as to the final quantum of development the Neighbourhood Plan area is likely to be required to accommodate, especially given the objections to the emerging Joint Local Plan and given the fact that the Local Plan covers an extended plan-period and is liable to change before it is adopted. Given Wallingford’s role as a higher tier settlement and its sustainability as a location for new development as part of the housing objectives for the District, it is highly likely that a proportion of the District’s needs will need to be accommodated at the town. Depending on the outcomes of the Local Plan examination, there is a clear risk that additional sources of supply will be required and currently the RWNP does not allow flexibility to enable this to occur. We would also note that the Court of Appeal confirmed in the recent R(DLA Delivery) v Lewes DC ([2017] EWCA Civ 58): “If a</p>		<p>contrary to policy CSM1 of the South Oxfordshire Core Strategy and polices T1 of the South Oxfordshire Local Plan.</p> <p>4. In the absence of a completed Section 106 agreement the proposal fails to secure infrastructure to meet the needs of the development. As such the development would be contrary to the NPPF, and policies CSI1 and CSM2 of the South Oxfordshire Core Strategy and policies T1, D12, R2 and R6 of the South Oxfordshire Local Plan 2011.</p> <p>5. In the absence of a completed Section 106 legal agreement, the proposal fails to secure affordable housing to meet the of the development. As such, the development would be contrary to policies CSH3 and CSH4 of the South Oxfordshire Core Strategy and the National Planning Policy Framework.</p> <p>In August 2020 Turley (on behalf of David Wilson Homes) withdrew the appeal against this decision. Letter below.</p> <p>Dear Mr Salter WITHDRAWAL OF APPEAL (PINS REF. APP/Q3115/W/20/3254247) – APPEAL BY DAVID WILSON HOMES (SOUTHERN) IN RESPECT OF LAND AT HITHERCROFT FARM, WALLINGFORD We write on behalf of the appellant, David Wilson Homes (Southern) (‘DWS’), in respect of the above appeal. The draft Wallingford Neighbourhood Development Plan was published for Regulation 16 consultation in July / August 2020 following the submission of the planning</p>
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<p>neighbourhood development plan has been made and the local planning authority later produces a development plan document containing new “strategic policies”, that development plan document will, under section 38(5) of the 2004 Act, prevail over any inconsistent policies in the neighbourhood development plan. And if a policy in a neighbourhood development plan is not, or ceases to be, up-to-date, this will be a material consideration in a development control decision, and may justify departing from that policy.” In light of the above, we see no merit in progressing with the RWNP prior to the adoption of the Joint Local Plan. 8(2)(d) The making of the neighbourhood plan contributes to the achievement of sustainable development A draft Neighbourhood Plan only meets the basic conditions if, inter alia, “the making of the Plan contributes to the achievement of sustainable development”, see paragraph 8(2)(d) of Schedule 4B TCPA 1990. The presumption in favour of sustainable development runs through the whole of national planning policy. This is manifested particularly in paragraph 11 of the NPPF. This states that for Plan making: “a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.” There is a two stage process to achieving sustainable development, firstly the assessment of objective needs for an area and, secondly, a determination whether the impact of meeting those needs would significantly and demonstrably outweigh the benefits. 4 For a neighbourhood plan to contribute to meeting sustainable development it must deliver, inter alia, the housing required as a result of that two stage process. Thus, neighbourhood plans are required to support the strategic development needs identified by Local Planning Authorities. In other words for a neighbourhood plan to be sustainable it too must meet the objectively assessed needs of the area as identified in an up to date Local Plan. A neighbourhood plan that does not meet the objectively assessed needs of the area to which it relates cannot be a plan that contributes to the achievement of sustainable development. For the reasons set out above, the final scale of housing that the Plan area will be required to meet in order to achieve sustainable development is currently unknown. There is a clear risk due to objections to the emerging Local Plan that the Plan will need to deliver additional development. The draft NP should be set aside and a new draft prepared alongside SODC Local Plan once this has passed through examination, in accordance with the advice in the</p>		<p>appeal. We have made representations in respect to the above appeal site on behalf of DWS. DWS are also aware the emerging South Oxfordshire Local Plan Hearing Sessions finished on 7th August 2020. Following the publication of the draft Neighbourhood Development Plan and our subsequent representations, DWS have considered their options. Taking into account the Neighbourhood Plan and the associated changes to the Planning Practice Guidance, DWS has made the decision to withdraw the above planning appeal. We hope the above is clear and would be grateful for confirmation of receipt. As you will see we have copied this letter to the Local Planning Authority for information.</p>
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	<p>NPPG. In this way a NP can be brought forward which is consistent with national policy and the strategic policies of the emerging Local Plan. 8(2)(e) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area It is clear that the preparation of the draft Neighbourhood Plan is running in ahead of the draft Joint Local Plan. Whilst it is generally possible for a Neighbourhood Plan to be progressed in advance of the corresponding Local Plan this does present problems in terms of meeting the basic conditions and legal compliance tests. The draft Neighbourhood Plan states at paragraph 1.1.5 that: “This Plan is prepared in accordance with Government guidance in the Planning Practice Guidance. It is in accordance with policies in the National Planning Policy Framework, and all references within the Wallingford Neighbourhood Plan refer to the September 2023 version of the NPPF. It is in general accordance with strategic policies in the South Oxfordshire Local Plan 2035. The Wallingford Neighbourhood Plan (WNP) is consistent with the strategic policies of this Local Plan. Whilst it has regard to the Oxfordshire Minerals and Waste Core Strategy (2017) and Local Plan, the Plan does not deal with minerals and waste, or nationally-significant infrastructure.” Once the Joint Local Plan has been adopted, it will form the strategic policies for the area, however as we note above, the PPG makes clear that “the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested”. Again, we strongly consider that if the Neighbourhood Plan is to be reviewed, this should be done to align with (after the adoption of) the Joint Local Plan.</p>		
9	<p><b>From Walsingham Planning on behalf of Nicholas King Homes received 5 April</b></p> <p>Representations on behalf of Nicholas King Homes Land at Purely Plants Nursery, Wantage Road, Wallingford OX10 0LU I write on behalf of my client Nicholas King Homes to submit comments to the above Neighbourhood Plan consultation. My client controls land (under an Option agreement) at Purely Plants Nursery, Wantage Road, Wallingford within South Oxfordshire District Council. The site was submitted to South Oxfordshire’s Joint Local Plan’s ‘Call for Land and Buildings available for Change’ consultation in September 2021. The site was also highlighted within our client’s response to the Joint Local Plan Issues consultation in May 2022 which outlined how the site would contribute to the draft Vision and Themes set out within the consultation documentation. Finally, representations were made in February 2024 towards the latest South and Vale Local Plan consultation. The site has also been subject of two recent planning applications:</p>	Noted	<p>Wallingford NP Working Group is aware of the planning history of the Purely Plants site, and the reasons for SODC refusing planning permission in June 2023 and January 2024.</p> <p>The reasons for refusal in January were:</p> <ol style="list-style-type: none"> <li>1. The proposed development would comprise new residential development beyond the existing built-up area of Wallingford in the open countryside on land that is not previously developed and is currently in an agricultural open countryside use. The principle of development on the site is not accepted and the proposal is contrary to the overall spatial development</li> </ol>

<p>1. P23/S0872/O - Outline planning application with all matters reserved (except for access and layout) for the erection of 63 dwellings, vehicular access from Wantage Road, and all associated works. Refused 8th June 2023. 2. P23/S3067/O - Outline planning application with all matters reserved (except for access and layout) for the erection of 63 dwellings, vehicular access from Wantage Road, and all associated works. Refused 16th January 2024. This letter provides comments on the consultation document and proposed changes in the context of relevant national policy and guidance on plan-making and to ensure the proposed changes to the Neighbourhood Plan do not hinder the ability of my client's site to deliver sustainable residential development during the proposed plan period. Summary The focus of these representations is the following sections: Consultation Document • P.16 Map 2 • P.27 Map 3 • P.28 Policy WS3 • P.28 paras 2.7.1 – 2.7.5 Modification Statement • P.3 Policy WS3 • P.3 Map 2 • P.3 Map 3 • P.4 – conclusion</p> <p>The thrust of the representations we are making is in relation to Policy WS3 “Development Within the Built-Up Area” and the inclusion of a built-up area boundary which excludes the nursery site. A new Map 3 has been added which shows the built-up area boundary. The caption to Map 2 states that it will be updated to show the built-up area boundary, but it does not actually show this at the moment. The proposed amendments to the Plan have significant implications for my client's site. The proposed built-up area boundary is not evidenced and not justified. Furthermore, the lack of transparency, lack of engagement, and ‘cart before horse’ approach makes the entire plan review process unsound. In order to make the plan sound, and for the changes to be justified, the built-up area boundary needs to be amended to include all built development and land that is contiguous with the built-up area of Wallingford, and that includes my client's site.</p> <p>Comments The Process The approach the Town Council have taken is a deliberate drawing of a boundary to exclude the site, without justification. At the same time, neither my client nor the landowner have been invited to be involved with the policy drafting which directly impacts the site. The only opportunity is this consultation, which is a ‘cart before horse’ approach and assumes a starting position which is quite advanced in policy formulation terms. To exclude the landowner or their representatives from the preparation of this draft policy which clearly significantly adversely affects the potential of their site is not a reasonable or sound basis for plan making or consultations. We do not agree with the Modification Statement's conclusion which states: “The changes proposed do not change the nature of the Wallingford Neighbourhood Development Plan. The Vision for Wallingford and Objectives remain unchanged and the Policies remain broadly the same, with updated references to reflect new legislation. The additions in Chapter Two are the site allocation of the medical centre on Site E (Policy WS2.3) and defining the Built-up Area Boundary to the</p>		<p>strategy and locational policies of the South Oxfordshire Local Plan 2035. The proposed development is contrary to Policy STRAT1 (Overall Strategy), Policy STRAT2 (Housing Requirements), and Policy H1 (Delivering New Homes) of the South Oxfordshire Local Plan 2035, and Wallingford Neighbourhood Plan Policy WS1 (Local Strategy for Wallingford) and Policy WS3 (Development Within the Built up Area).</p> <p>2. The proposed development is located beyond the existing built-up area of Wallingford in the open countryside within the setting of the North Wessex Downs National Landscape. The proposed new buildings are not sensitively located and designed to avoid or minimise impacts on the AONB and would have an adverse impact on the landscape, neither conserving or enhancing the natural scenic beauty of the AONB (National Landscape). The proposal would extend the built-up limits of Wallingford into open countryside and would harm the landscape and rural character of the area and have an adverse impact on public views. As such, the proposed development will not visually enhance or complement its surroundings and does not respond positively to the site or surrounding area. The proposed development is contrary to the National Planning Policy Framework and Policy ENV1 (Landscape and Countryside), Policy DES1 (High Quality Development), Policy DES2 (Enhancing Local Character) of the South Oxfordshire Local Plan 2035 and Wallingford Neighbourhood Plan Policy HD1 (Design).</p>
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<p>town (Policy WS3). We therefore consider that the changes proposed constitute material modifications that do not change the nature of the Wallingford Neighbourhood Development Plan, and would require examination but not a referendum.” This is incorrect. The introduction of a built-up area boundary and new map does not mean “policies remain broadly the same”, but rather it has significant implications for landowners and site promoters who are being excluded from the plan-making process. Through the review, the nature of the Wallingford Neighbourhood Development Plan has been changed and the proposed changes have significant implications for spatial planning in and around Wallingford. Indeed, Policy H1 of the adopted SODC Local Plan states at part 3(iii) that residential development on sites not allocated in the Development Plan will only be permitted where it is development within the existing building up areas of Towns, and states at part 4 that the residential development of previously developed land will be permitted within and adjacent to the existing built-up areas of Towns. Paragraph 7.36 of the Examiner’s Report (Jan 2021) into the current WNP confirms that the current approach of WS4 will contribute towards the achievement of sustainable development in the town. The proposed approach will undermine this. The arbitrary approach taken to drawing the built-up area boundary in the DWNP will have implications for the Local Plan policies concerned with housing supply.</p> <p>Draft Policy Turning to draft Policy WS3 ‘Defining the Built-up Area Boundary to the town’, it is not clear why the boundary has been drawn as presented. No justification or supporting evidence is provided. The supporting text inserted into 2.71-2.74 sets out high level general principles, and not reasoned justification as to why the boundary has been amended, and why specifically the land at Purely Plants Nursery has now been excluded. In any event, the high-level principles set out at 2.71-2.74 have not been adhered to. This is clearly an unsound approach to plan-making. It is not logical to exclude the site. It is within the built-up area and it comprises buildings and land that is contiguous with the adjacent built up area of Wallingford. Indeed, it qualifies as the built-up area under the Town Council’s own definitions set out at 2.74, namely: The principles used in defining the Built-up Area Boundary are inclusion of: • the main residential and/or commercial areas; • areas on the edges of the town where planning permission has already been granted for housing; and • other land on which housing may be acceptable. Conversely, the site does not meet any of the criteria set out at 2.75 when it comes to excluding sites: We have not included the following within the Built-up Area Boundary: • school playing fields, recreation grounds and allotments where these adjoin the rural area; • groups of isolated houses or other buildings where infilling or intensification of development would result in harm to the character and appearance of the rural area or setting of the AONBs/National Landscapes and would be</p>		<p>3. The parameter plans propose a layout, urban grain and heights at odds with the character of the edge of settlement location. The development does not respect the existing local context or complement the scale and height, or grain of the surrounding area. The development also fails to demonstrate it can provide space for an adequate landscape buffer, that it can provide sufficient private garden space for all properties, that it can provide sufficient usable public open space in an appropriate location, including allotments and play facilities, and adequate space above and below ground for street trees. The proposal is contrary to DES1 (High Quality Development), Policy DES2 (Enhancing Local Character), Policy DES3 (Design and Access Statements), Policy DES4 (Masterplans for Major Development), Policy CF5 (Open Space and Recreation in New Developments) and Policy ENV1 (Landscape and Countryside) of the South Oxfordshire Local Plan 2035, and Wallingford Neighbourhood Plan Policy WS1 (Local Strategy for Wallingford) and Policy HD1 (Design).</p> <p>4. The proposed development would not be served by an access that would be safe and convenient for all users to the highway network. The application fails to properly assess the traffic impacts of the proposed development, the potential delays on the local highway network and the resulting impact on highway safety. The proposed development would not provide sufficient safe and practical accessibility by sustainable transport modes. As such, the proposed access, parking and overall highway impact of the proposal is contrary to Policy DES1</p>
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<p>inappropriate. • land within the curtilage of houses which adjoin the rural area where back-land development would be inappropriate. Clearly, the examples listed at 2.74 &amp; 2.75 above are not exhaustive. However, by the Town Council’s own limited criteria – which is the only information available which gives any indication into the thought process of how this policy has been drafted – the site at Purely Plants Nursery meets some of the definitions of land within the built-up area boundary, and does not meet any of the definitions of land to be excluded from the built up area boundary.</p> <p>The current draft plan is not justified. No evidence has been presented as to why developed land and buildings that are physically adjacent to other developed land and buildings have been excluded. The built-up area boundary is therefore entirely arbitrary. In order to make the plan sound, and for the changes to be justified, the built-up area boundary needs to be amended to include all built development and land that is contiguous with the built-up area of Wallingford, and that includes my client’s site. It is the only logical approach to defining a built-up area boundary. We do not have any other comments on the changes elsewhere in the Plan. Conclusion The plan-making process and current consultation is unsound, and the proposed changes are not justified. The Draft Wallingford Neighbourhood Plan consultation document and Modification Statement has been prepared in a ‘cart before horse’ manner which has assumed a starting position and drawn a settlement boundary to match. Neither my client or the landowners have been consulted on or invited to be involved in any planmaking to date, and clearly what is shown in Map 3 has significant implications for the site. My client has been excluded from the process which has seen a consultation document prepared and a new settlement boundary drawn up which seeks to deliberately position the site outside of the settlement boundary. The manner in which the Plan has been prepared fails to meet the tests of soundness outlined in the NPPF. The Modifications Statement is incorrect to conclude that the changes proposed do not change the nature of the Wallingford Neighbourhood Development Plan. The drawing up of a defined settlement boundary has implications for the spatial strategy and distribution of growth across Wallingford, and will severely restrict development of otherwise suitable sites that should be assessed on a case by case basis. Housing targets are a minimum, not a cap. South Oxfordshire District Council is failing to meet the needs of their residents and deliver the required amount of housing, leading to a severe shortfall in supply, with only 4.2 years being the amount stated by SODC in their latest position statement, and an even greater shortfall of 3.49 years being established by Inspectors at recent planning inquiries across the district. Our client’s site is an unconstrained site, located in a sustainable location physically adjoining the existing settlement of Wallingford, within the highest tier of the settlement hierarchy. The site has the capacity to accommodate approximately 63 dwellings helping to</p>	<p>(High Quality Development), Policy TRANS2 (Promoting Sustainable Transport and Accessibility), Policy TRANS4 (Transport Assessments and Travel Plans), and Policy TRANS5 (Development Proposals) of the South Oxfordshire Local Plan 2035 and WNDP Policy WS1 (Local Strategy for Wallingford) and Wallingford Neighbourhood Plan Policies MC1 (Transport Statement and Travel Plan Statement), Policy MC4 (Safe Travel) and Policy MC5 (Vehicle Parking).</p> <p>5. In the absence of a completed Section 106 legal agreement, the proposed development fails to secure affordable housing with a suitable housing mix, type and tenure to meet the needs of the district. As such, the proposal is contrary to Policy H9 (Affordable Housing) and Policy H11 (Housing Mix) of the South Oxfordshire Local Plan 2035 and Wallingford Neighbourhood Plan Policy HD3 (Affordable Housing and Housing Mix).</p> <p>6. The submitted application has not demonstrated that the development outweighs the economic and sustainability considerations relating to the mineral resource. The submitted application does not propose mineral resource would be extracted prior to the development taking place or alternatively provide reasons for why it would not be contrary to minerals and waste policy. Therefore, the County Council object to the proposed development on the grounds as there is no evidence to demonstrate potential future mineral extraction will not be prevented or otherwise hindered by the development. The minerals and waste authority</p>
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	<p>meet the likely under-provision in the housing supply. The site will deliver other benefits to the District including 40% affordable housing, CIL contributions, and contributions towards infrastructure.</p>		<p>advise the proposal is contrary to Policy M8 (Safeguarding) of the Oxfordshire Minerals and Waste Local Plan. The proposal is therefore contrary to Policy EP5 (Minerals Safeguarding Areas) of the South Oxfordshire Local Plan 2035.</p> <p>7. In the absence of a completed Section 106 legal agreement, the proposed development fails to secure infrastructure necessary to meet the needs of the development. The proposal is contrary to Policies INF1 (Infrastructure), Policy TRANS4 (Transport Assessments and Travel Plans), TRANS5 (Transport), Policy EP3 (Waste Collection and Recycling) and Policy CF5 (Open Space, Sport and Recreation in New Developments) of the South Oxfordshire Local Plan 2035.</p>