

Response 1: ID ANON-DDCF-ZVNR-1

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-19 18:34:33

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Dr

Name:

Tony Stead

Job title (if relevant):

Ex-Chairman of the Cholsey and Wallingford Railway

Organisation (if relevant):

Cholsey and Wallingford Railway

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

The Oxford English Dictionary defines 'history' as:

The branch of knowledge that deals with past events

but Wallingford Town Council seem to want to write their own definition. Why is this?

When considering 'history' WTC seems to want to omit recent history and, in the Neighbourhood Plan, deal only with events that occurred hundreds of years ago. These are of course important but what of the Victorian period and the changes brought about by the railways or how the town was used during two World Wars? The events certainly changed the town and should be remembered but, in the Chapter relating to History such events are not mentioned why?

Under tourism very little is made of the presence in the town of a Heritage Railway and yet this attracts more people to the town than any event organised by WTC. I believe there were just 300 visitors when the 'walled gardens' were opened (and this was organised on behalf of Sue Ryder homes not WTC) whilst the railway attracted around 35,000 visitors in 2022. Moreover, most of the garden visitors would have been local and not been spending money in the town whilst visitors to the railway would have travelled from far away and spent money on B&B, hotels, restaurants and cafes. Given the importance of the railway to the local economy surely WTC should support its development? However, under we now see that the 10m (it was to be 20m

originally) of land on the western side of the land between Bradfords Brook and the Bypass is not reserved solely for the railway but for a multitude of different transport needs, is this the support that the major visitor attraction in Wallingford can expect from the Council?

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

The Section/Chapter relating to History needs to reflect ALL of history not just a specified period.

Under Tourism greater clarity is required in relation the strip of land to the west between Bradfords Brook and the Bypass. Originally this was to be 20m (see Council Minutes) but it has now shrunk to 10m and is reserved for a multitude of uses not just the railway.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Yes, I request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Because the Council has gone back on previous promises and still seems to want to use its own definition of 'History'. The people of Wallingford deserve an opportunity to correct these matters.

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 2: ID ANON-DDCF-ZVN1-Z

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-06-28 08:39:17

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

■

Name:

■■■■■■■■■■

Job title (if relevant):

GP Partner

Organisation (if relevant):

Wallingford Medical Practice

Organisation representing (if relevant):

Wallingford Medical Practice

Address line 1:

Wallingford Medical Practice, Reading Road

Address line 2:

Wallingford Medical Practice, Reading Road

Address line 3:

Wallingford Medical Practice, Reading Road

Postal town:

Wallingford Medical Practice, Reading Road

Post code:

Wallingford Medical Practice, Reading Road

Telephone number:

01491 835577

Email:

wallingford.edt@nhs.net

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We fully support the proposed changes (policy WS2) to make explicit the allocation of Land on Site E for a new medical centre. As previously laid out in this consultation and elsewhere the current Wallingford Medical Practice premises are too small. The practice needs to relocate to more suitable and larger premises in order to protect medical services provision in the town, and the proposed neighbourhood plan changes will help us to realise this move. The practice submitted its formal detailed application to the ICB last summer and negotiations continue with them and third party developers. The practice also continues active and constructive discussions with the land owner Berkeley Homes who have committed publicly to gifting a tranche of land at Site E for this purpose. Details of this agreement are being finalised and a planning application is expected before the end of the year. The proposed allocation in the neighbourhood plan is an important step in ensuring this application is successful.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

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You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 3: ID ANON-DDCF-ZVND-K

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-01 11:26:10

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mr

Name:

Richard Bakesef

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

I fully support this plan. However, please note that there is a slight typing error in paragraph 2.4.9 - point 3. I suspect 'he' should read 'the'. Otherwise a very comprehensive review.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

In paragraph 2.4.9 - point 3, change 'he' to 'the'.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other (please specify below)

Other, please specify:

[REDACTED].

Response 4: ID ANON-DDCF-ZVNP-Y

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-02 16:06:40

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:

Ross

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

[REDACTED]

Post code:

[REDACTED]

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

For context, I'm a young Wallingford resident and my primary interest in the neighbourhood plan is as a tool to stop over-development being forced on the area by central government and commercial interests. Please accept my below comments on the recently published WNP consultation:

1. The WNP does a very good job of limiting future housing development within the Wallingford boundary.
2. The WNP is limited in effectiveness by excluding the outlying villages. Brightwell, Cholsey, Benson, Shillingford, and most of all Crowmarsh, should all really be considered "Greater Wallingford", which would then have further implications:
 - i. "Greater Wallingford" has already absorbed far more development in recent decades than is described in the WNP.
 - ii. The rural identity of Wallingford will continue to be degraded by development permitted in the surrounding area.
3. I think there is an unwritten contract with residents that filling in the ring-road as slowly as possible is acceptable development, however there seems to be a risk after this plan expires in 2035 of pushing back the greenbelt to expand development beyond the ring-road. That would be totally unacceptable over any timescale.
Please accept 11 years advanced warning of extreme civil disobedience from me if this were to happen.
4. I note pedestrianising Wallingford town square is mentioned once in 10.1.8.8. I've anecdotally found this a very popular idea and would like to see more urgency in pursuing it.

Thankyou in advance

[REDACTED]
[REDACTED]
[REDACTED]

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 5: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-15 15:39

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:

Gillian Davies

Job title (if relevant):

Retired Environment Agency Groundwater and Contaminated Land Technical Officer

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Your Comments:

RESPONSE TO WALLINGFORD NEIGHBOURHOOD PLAN REVIEW - MAY 2024

Comments from Gillian Davies - Wallingford Resident and former (retired) Groundwater and Contaminated Land Technical Officer at the Environment Agency.

The Wallingford Neighbourhood Plan does not address issues about the lack of sewerage infrastructure in the locality. Wallingford will eventually have around 1,500 extra houses and there are also new houses being built in Cholsey and Benson and all of these are served by the Sewage Treatment Works at Cholsey and Benson.

Wallingford Neighbourhood Plan May 2024

In Chapter 2 of the Wallingford Neighbourhood Plan under SODC's and our Local Strategy - item 2.5.12 states that "Community has strong concerns about remaining capacity of a number of essential services and facilities" and lists 'sewage treatment' as one of those concerns. It continues - "This is evidenced by a Water Cycle Study commissioned by SODC" and that "The level of development in Wallingford is likely to exceed current capacity of (potable) mains within this area" and also "The waste water network capacity in this area is unlikely to be able to support the demand anticipated." Why, when the problem has been highlighted, has this lack sewerage infrastructure not been addressed in the Wallingford Neighbourhood Plan?

Wallingford Neighbourhood Plan Review - Consultation Statement May 2024

Thames Water's response (in their capacity as a 'specific consultation body') Table 3 - Submissions from statutory bodies states:- "Thames Water consider

that there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan. 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”.

Thames Water also say “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 & Water Treatment Works upgrades can take 3-5 years.”

Thames Water’s response is very detailed (Pages 77 - 82) and they even provided the proposed text for their new Water /Wastewater infrastructure policy. Is this not a red flag - when Thames Water themselves suggested that a policy should be added to the Wallingford Neighbourhood Plan?

Thames Water also very clearly state that “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. 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.” My interpretation of this is, that the Developer will probably not be able to sell houses unless Thames Water have capacity to let them connect to the main sewer and hence the Sewage Treatment Works.

To give Thames Water credit - they did flag up their concerns about insufficient sewerage capacity when commenting on individual planning applications within Wallingford. I trawled through those planning applications on SODC’s planning portal and found those where Thames Water said there was insufficient sewerage capacity. Subsequent communications between myself and Thames Water through the former MP David Johnston (as the intermediary) revealed that some of the new developments are either using on-line or off-line storage (*) or using enlarged sewer pipes (900mm rather than 150mm) on their sites as an interim measure. This is currently happening because there is currently insufficient capacity at the Sewage Treatment Works to deal with the extra sewage from new developments.

The response from Wallingford Town Council and Wallingford Neighbourhood Plan volunteers to Thames Water’s comments was to say:- “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.” So what does the SODC Local Plan say about this sewerage problem?

The Published SODC Local Plan talks about a ‘Spatial Strategy policy for strategic development’ but does not address local developments applying for planning permission. They talk about a policy for protecting ‘existing infrastructure’, but this does not cover the need for additional sewerage infrastructure for new homes in and around Wallingford. The SODC Local Plan even has a policy for Water Resources that says the ‘Developers must demonstrate that there is or will be adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the whole development’. This begs the question - how is a Developer supposed to demonstrate that Thames Water is going build in additional capacity at their Sewage Treatment Works to deal with the new homes being built in Wallingford and the surrounding area?

The SODC Local Plan also says that ‘Thames Water is the water and wastewater service provider for South Oxfordshire. Thames Water is responsible for the planning and implementation required to provide a secure supply of water to their customers’. There is no mention that Thames Water is required to provide sewerage provision for their customers.

So the sewerage problem is neither addressed by SODC Local Plan nor the Wallingford Neighbourhood Plan. This is a really serious omission.

(+) Grampian conditions are negative conditions which preclude the implementation of development permitted by a planning permission until some step required by the condition has been undertaken. They often relate to work on 3rd party land. In this case 3rd party land is probably the Sewage Treatment Works.

(*) On-line storage - underground storage tanks that can empty naturally by gravity back into the sewer and off-line storage tanks need to be emptied by pumps. In effect the on-line storage is a septic tank and off-line storage is a cess pit.

Regards

Gillian Davies DPhil, MSc, BSc (Hons)

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Response 6: ID N/A

Submitted to Thame Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-19 10:30

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

█

Name:

██████████

Job title (if relevant):

Property Town Planner

Organisation (if relevant):

Thames Water

Organisation representing (if relevant):

Address line 1:

1st Floor West, Clearwater Court

Address line 2:

Address line 3:

Postal town:

Reading

Post code:

RG1 8DB

Telephone number:

██████████

Email:

██████████@thameswater.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please find attached our response to the above consultation.

Regards

█

██████████

Property Town Planner

██████████

██████████@thameswater.co.uk

1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:



E: [REDACTED]@thamewater.co.uk
M: +44 (0) 7747 647031

Issued via email:
planning.policy@southandvale.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

19 July 2024

South Oxfordshire District – Wallingford Neighbourhood Plan Review Submission Document May 2024

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

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 & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Paragraph 2.5.12 - Water Supply and Wastewater/Sewerage Infrastructure – Policy Omission

As previously set out, Thames Water consider that there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan.

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.

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.

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...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

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”

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, the provision of infrastructure...”

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....”

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).

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. 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 & Water Treatment Works upgrades can take 3-5 years.

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.

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.

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:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

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:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

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:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“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.”

“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.”

Policy WS1.1 (b) & Objective WNP03 & Policy HD2.1: Water Efficiency/Sustainable Design

We support the reference to sustainable water use, but further policy is required to ensure this happens in practice.

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.

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 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.

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:
<https://www.thameswater.co.uk/Be-water-smart>

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.

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.

In light of the above, we consider that the Neighbourhood Plan should include the following policy:

“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.”

Comments in relation to Flood Risk and SUDS

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 than from river and sea, which includes "Flooding from Sewers".

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.

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.

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.

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.

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."***

Development Sites

There are no new site allocations for us to comment upon. There is just the one allocation which already has permission and we're in discussions with the developer regarding wastewater capacity (see attached

We recommend other Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

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.

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.

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.

We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Yours faithfully,

[REDACTED]
Thames Water Property Town Planner

Site ID	Site Name	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase Water	Water Response	Waste Response	Internal Comments
12827	Land north and south of Winterbrook Lane, Wallingford	465102	5.38	435	152250	5.29	435		<p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>Waste Network - The site is already in the process of being developed and a project is progressing with the developers in terms of ensuring waste network capacity exists.</p>

Response 7: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation Submitted on 2024-07-22 15:29

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Organisation (if relevant):

Williams Gallagher

Organisation representing (if relevant):

Wilder Family

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

[REDACTED]

Email:

[REDACTED]@williams-gallagher.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam

Please find attached a representation in connection with the Regulation 16 WNP update consultation.

Kind regards

Heather

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

22 July 2024

Planning Policy
South Oxfordshire District Council
Abbey House
Abingdon
OX14 3JE

Williams Gallagher
Somerset House
37 Temple Street
Birmingham
B2 5DP

williams-gallagher.com
m: 07375 041 974

e: [REDACTED]@williams-gallagher.com

Sent by Email:
planning.policy@southandvale.gov.uk

Dear Sir / Madam

**WALLINGFORD NEIGHBOURHOOD PLAN REGULATION 16 PUBLIC CONSULTATION
REPRESENTATIONS ON BEHALF MR & MRS T AND A WILDER AND MR AND MRS J AND R WILDER**

Williams Gallagher is instructed by our clients, Mr & 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 (see Figure 1) to submit representations in connection with the Wallingford Neighbourhood Plan ('WNP') Regulation 16 Consultation which runs until 25 July 2024.

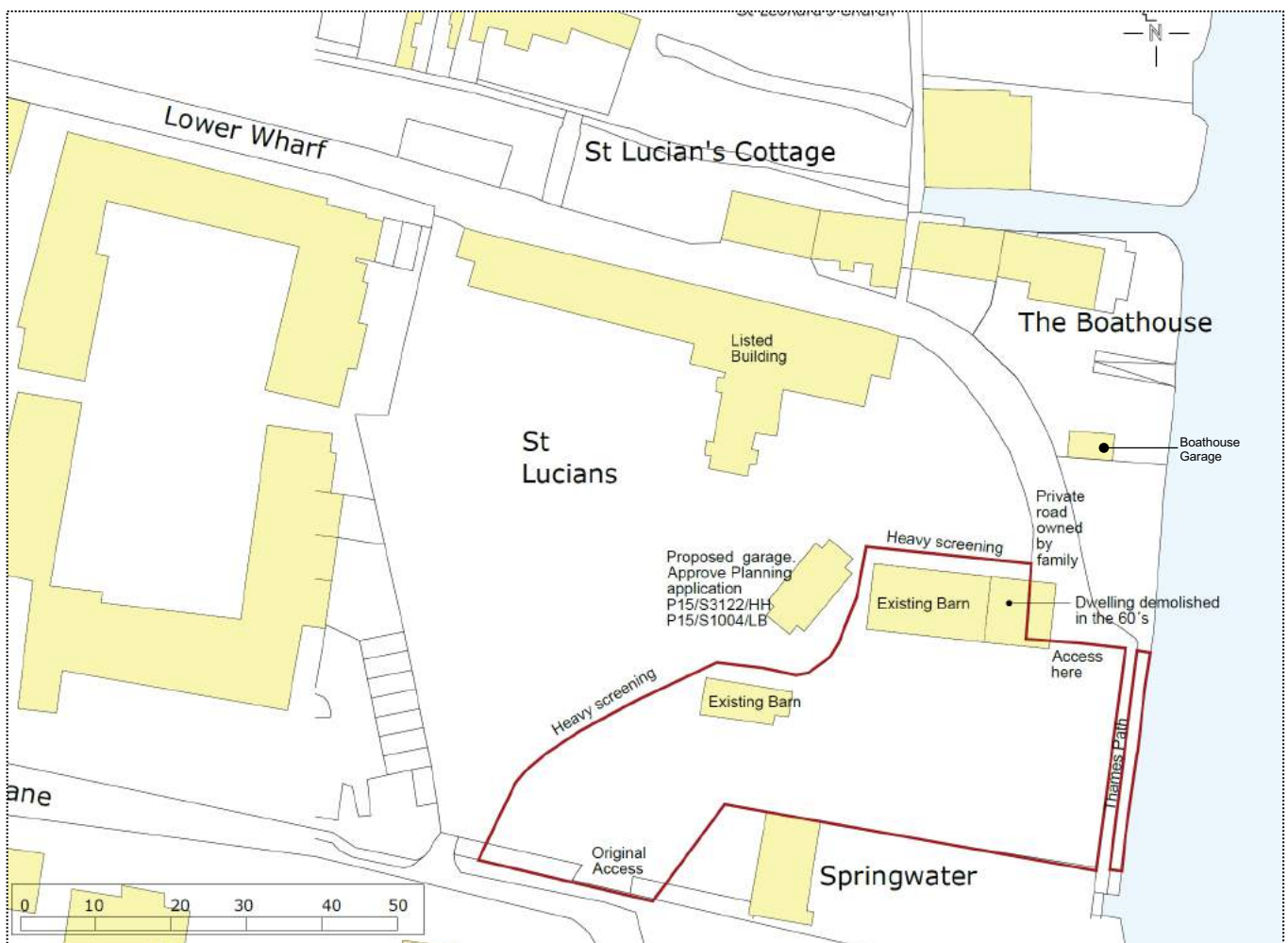


Figure 1: Land and Buildings between Lower Wharf and St Lucian's Lane
Source: OS Map with Site Boundary and Adjacent Properties Indicated

This follows representations submitted on the Owners' behalf in respect of the WNP Regulation 14 Consultation in April 2024 where we strongly objected to the proposed amendment to Policy WS3 ('Development within the Built-Up Area') and the associated Policies Map at Para 2.7 of the Regulation 14 draft Plan (namely the 'Wallingford Built-Up Area Boundary') (Map 3). It was argued 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 any way be described as 'isolated' from the remainder of the area or forming part of the 'countryside'.

A copy of this representation, dated 6 April 2024, is enclosed with this letter for ease of reference.

REPRESENTATION

It is noted that since our representation was made, concerted efforts have been made by the WNP Working Group to address our concerns. This is set out at Page 46 of the WNP Review Consultation Statement (May 2024):

"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. 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".

This modification is welcomed and supported, and we of course note the WNP Working Group's amendment to Paragraphs 2.7.1 – 2.7.12 which support Policy WS3. It remains however the case that settlement boundaries (or as referred to here, built-up area boundaries) are traditionally used as a spatial planning tool to direct development to the most sustainable locations while protecting the character of the countryside, villages and towns and preventing the actual or perceived coalescence of settlements.

To this end, the exclusion of the Oxford University (OU) Boathouse, as well as gardens to the river, garden sheds/outbuildings previously associated with at St Lucian's (as well as the garage associated with the Boathouse) is considered unwarranted – these sites clearly already contain built development and as such form part of the existing built-up area.

The fact that these areas have been defined as falling within Flood Zone 3 does not prevent all types of development coming forward in this location. Indeed, it remains that certain development in this location could be regarded as acceptable having regard to Table 2 of Government's Flood Risk and Coastal Change Guidance. It is furthermore the case that other policies contained within both the SODC Local Plan and the WNP are sufficient to prevent harmful development coming forward in these locations – it is not therefore necessary for certain sites to be excluded from the Built-Up Area Boundary on grounds of, inter alia, flood risk and impact on the setting of the Thames / AONB / Natural Landscape. For example, SODC Local Plan 2035 Policy EP4 Flood Risk looks to manage the risk and impact of flooding across and Policy ENV1 Landscape and Countryside assures that the highest level of protection will be given to AONBs / National Landscapes including proposals that could affect their setting.

As it stands, the 2no. buildings on the Site and adjacent to the Site (namely the Boathouse garage) 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 and surrounding land (including the Boathouse garage) form part of the built-up area and are within and have historically formed part of the town (the 2 no. barns have been in situ for many, many years – see Table 1 below).

There are also dwellings to the north, south, and west. Views from the riverbank opposite the Site are already shielded by a mature hedge on the river side of the Thames path and a fence on the Site.

DATE	MAP
1883	
1938	

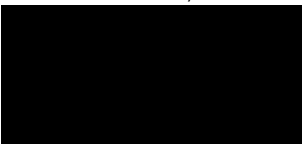
DATE	MAP
1960	

Table 1: Extracts from Landmark Historical Maps
Source: Landmark Information Group

As a final point, and referring to Map 2 of the Submission Version of the WNP (Page 15), it is noted that the quality of this map is quite poor and heavily pixelated when zooming in. We request that a better quality map be produced as part of the Examination process and ahead of the Plan being adopted. This is so as to ensure there is no ambiguity as to the extent of the Built-Up Area Boundary (and indeed other marked up areas such as housing sites and the town centre boundary) when reviewing individual sites in detail.

We 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.

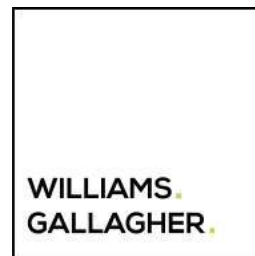
Yours faithfully,



WILLIAMS GALLAGHER

Enclosure: Regulation 14 Representation dated 6 April 2024

**ENCLOSURE 1:
REGULATION 14 REPRESENTATION DATED 6 APRIL 2024**



Williams Gallagher
Somerset House
37 Temple Street
Birmingham
B2 5DP

williams-gallagher.com
m: 07375 041 974

e: [REDACTED]@williams-gallagher.com

6 April 2024

Wallingford Town Council
8a Castle Street
Wallingford
OX10 8DL

Sent by Email:
wnp@wallingfordtowncouncil.gov.uk

Dear Sir / Madam

WALLINGFORD NEIGHBOURHOOD PLAN REGULATION 14 PUBLIC CONSULTATION REPRESENTATIONS ON BEHALF MR & MRS T AND A WILDER AND MR AND MRS J AND R WILDER

Williams Gallagher is instructed by our clients, Mr & 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 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 & SITE CONTEXT

By way of background, Mr & 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 Salhouse. 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.

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).

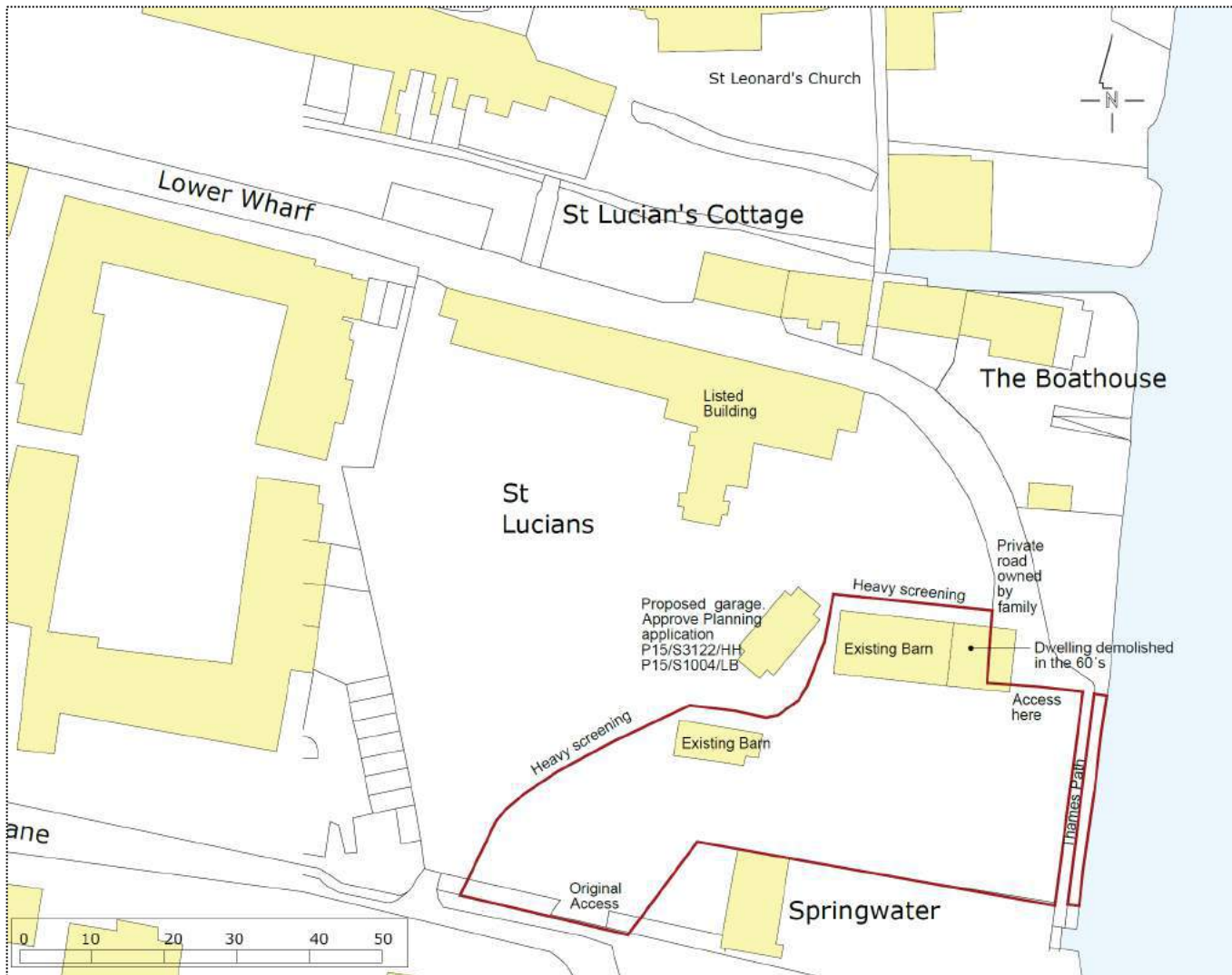


Figure 1: Site Location (Red Line)
 Source: OS Map with Site Boundary and Adjacent Properties Indicated

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 the aforementioned private road) and St Lucian’s Lane to the south (see Figure 1). The Thames Path (a National Trail¹) 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.

¹ https://www.nationaltrail.co.uk/en_GB/trails/thames-path/

Photographs of Site and Existing Buildings



Photograph 1: View of Site and Surrounding Land and Premises from River
Source: Mr & Mrs T and A Wilder



Photograph 2: Barn No. 1 with Barn No. 2 and Springwater House in Background
Source: Mr & Mrs T and A Wilder



Photograph 3: Barn No. 2
Source: Mr & Mrs T and A Wilder

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 Built-Up 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).

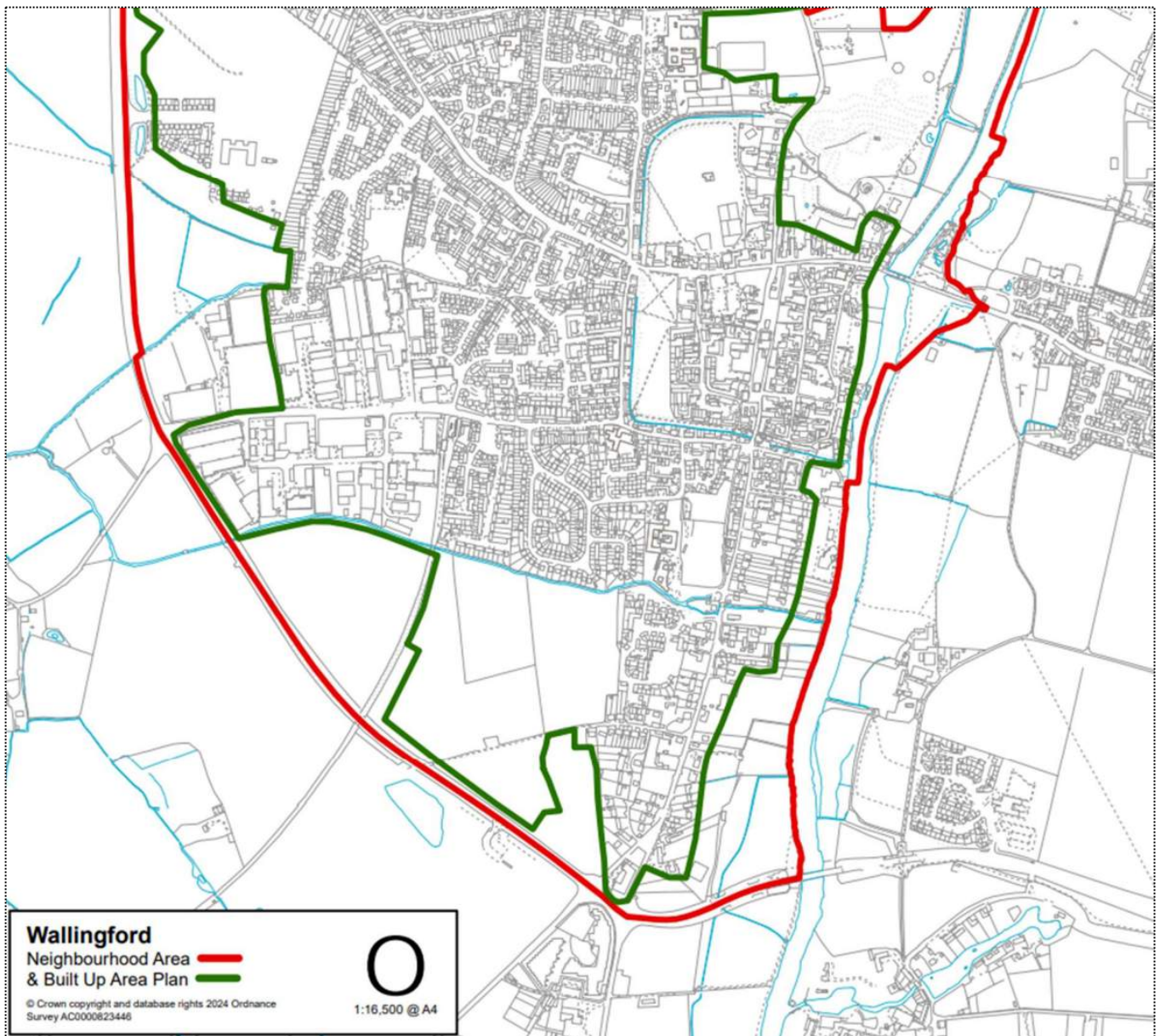


Figure 2: Proposed Wallingford Built-Up Area – Map 3 (Extract)
Source: Draft WNP

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, 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 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. 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 AONBs/National Landscapes and would be inappropriate;*
- land within the curtilage of houses which adjoin the rural area where back-land development would be inappropriate."*

Paragraph 1.6.3 is also of note as it sets out what the update to the WNP aims to assess:

- "whether policies need changing as a result of the adoption of the SODC Local Plan 2035 or changes to the NPPF or other material considerations;*
- whether work has been undertaken so 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".*

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.

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.

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 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.



Figure 3: Approximate Location of Excluded Area (Site and Surrounding Land and Premises – Green Outline)
Source: Google Maps with Williams Gallagher Mark Up

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).

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".

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 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"*.

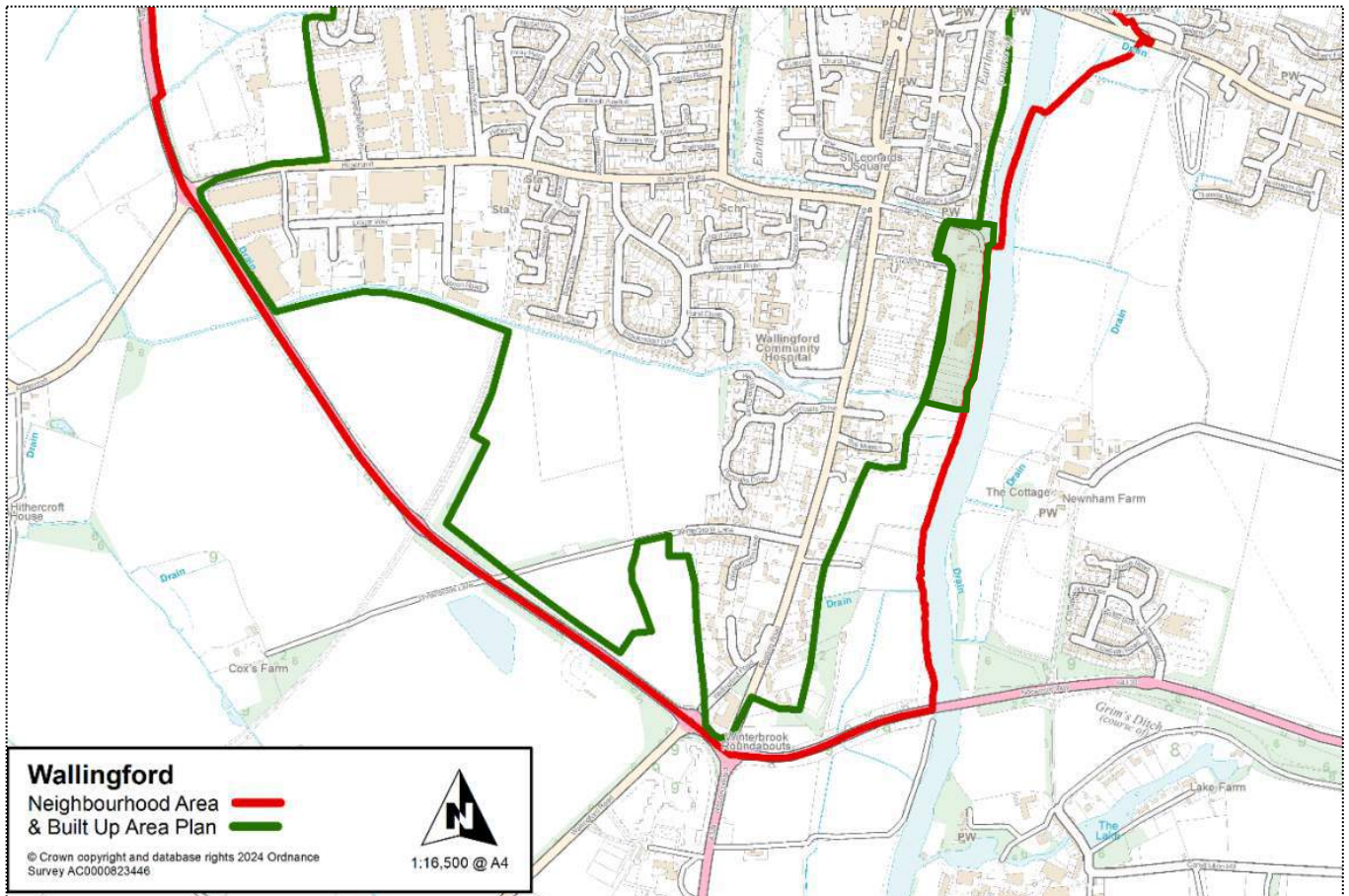


Figure 4: Proposed Amendment to Built-Up Area Boundary (Area Shaded Green)
Source: Draft WNP Map 3 with Williams Gallagher Mark Up

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.

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. 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.

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 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.

Yours faithfully,

A large black rectangular redaction box covering the signature of the undersigned.


WILLIAMS GALLAGHER

Response 8: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation Submitted on 2024-07-23 07:47

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Adviser Operations Delivery

Organisation (if relevant):

Natural England

Organisation representing (if relevant):

Address line 1:

County Hall

Address line 2:

Spetchley Road

Address line 3:

Postal town:

Worcester

Post code:

WR5 2NP

Telephone number:

0300 0603900

Email:

consultations@naturalengland.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

For the attention of Edward Williamson

Please find Natural England's response in relation to the above mentioned consultation attached.

Kind regards,

[REDACTED]

Adviser

Operations Delivery, Consultations Team

Natural England

County Hall

Spetchley Road

Worcester

WR5 2NP

Tel 0300 0603900

Date: 23 July 2024
Our ref: 479017
Your ref: Wallingford Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

██████████
South Oxfordshire District Council

BY EMAIL ONLY

planning.policy@southandvale.gov.uk

Dear ██████████

Wallingford Neighbourhood Plan - 2024 Review - Regulation 14 Consultation

Thank you for your consultation on the above dated 13 June 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

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.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

██████████
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Response 9: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation Submitted on 2024-07-23 15:58

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agent

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Strategic Planner

Organisation (if relevant):

Oxfordshire County Council

Organisation representing (if relevant):

Address line 1:

County Hall, New Road

Address line 2:

Address line 3:

Postal town:

Oxford

Post code:

OX1 1ND

Telephone number:

07919 175871

Email:

[REDACTED]@oxfordshire.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear South Oxfordshire Planning Policy,

Please find attached a response from Oxfordshire County Council to the Wallingford Neighbourhood Plan Review Consultation. I'd be grateful if you could confirm receipt.

Kind regards

[REDACTED]

[REDACTED]

Strategic Planner

Strategic Planning & Infrastructure | Environment & Place

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING
CONSULTATION:**

District: South Oxfordshire

Consultation: Wallingford Neighbourhood Plan 2024-2035 (Submission Document)

Annexes to the report contain officer advice-.

Overall View of Oxfordshire County Council

Oxfordshire County Council welcomes the opportunity to comment on the Wallingford Neighbourhood Plan Review and supports the Town Council's ambition to prepare an updated Neighbourhood Plan.

Officer's Name: [REDACTED]

Officer's Title: Strategic Planner

Date: 23 July 2024

ANNEX 1
OFFICER ADVICE

District: South Oxfordshire

Consultation: Wallingford Neighbourhood Plan 2024-2035 (Submission Document)

Team: Strategic Planning

Officer's Name: [REDACTED]

Officer's Title: Strategic Planning

Date: 18/07/2024

Strategic Planning Comments

OCC has previously provided comments on the Pre-Submission version of the Wallingford Neighbourhood Plan in April 2024, as well as during the preparation of the existing Neighbourhood Plan which was made in May 2021.

A number of changes have been made in response to our previous comments, which is welcomed. However, there are some outstanding matters which we consider still need addressing.

A number of text amendments are needed to Policy MC1: Impact of Development Proposals on the Public Highway and Parking Provision.

- This includes appropriate reference to County Council standards and, or, National Guidance, including LTN1/20.

Further changes are also sought to:

- Policy MC4: Safe Active Travel,
- Policy CF1: Support for New Formal and Informal Sport and Community Facilities and,
- Policy MC5: Vehicle Parking.

In regard to Policy TC5.1: Public and Private Car Parks, we regard the emphasis on the importance of car parking over improvements to public and active travel is contradictory to the County Council's Local Transport and Connectivity Plan¹. Increased parking in central Wallingford would create higher risk of congestion on the rest of the network, and air quality issues.

As per comments made in response to the made plan (February 2021), our concerns remain regarding Objective MC01 and MC10, that restricting access to through traffic in the town centre would be difficult to enforce on deliverability grounds.

Finally the plan should be consistent and in conformity with the County Council Parking Standards², therefore changes are sought to:

- Objective MC06
- Policy MC3: Cycling
- Paragraphs 8.3.13-14, and 8.3.18

For completeness, the following teams were consulted and had no comments to make:

- Minerals and Waste Policy

¹ [Local Transport and Connectivity Plan | Oxfordshire County Council](#)

² [Transport Development Management \(TDM\) | Oxfordshire County Council](#)

District: South Oxfordshire

Consultation: Wallingford Neighbourhood Plan 2024-2035 (Submission Document)

Team: Transport Development Management

Officer's Name: [REDACTED]

Officer's Title: Assistant Transport Development Management Officer

Date: 23/07/2024

Transport Development Management Comments

WS1.1(i) consider changing bullet 2 from “high quality bus stops and new bus services”; to “high quality bus infrastructure”.

Objective MC01: As per previous comments to the adopted plan (February 2021): we raise concerns that restricting access to through traffic in the town centre would be difficult to enforce on deliverability grounds.

Objective MC06: All new development should comply with Oxfordshire County Council Parking standards. This objective (MC06) does not recognise the opportunities for car free developments which may be suitable for some town centre locations in Wallingford.

Objective MC10: As per previous comments to the adopted plan (February 2021): we raise concerns that restricting access to through traffic in the town centre would be difficult to enforce on deliverability grounds.

Paragraph 8.3.1: New developments can also result in a reduction in vehicle trips if the proposed development generates less trips than the existing land use.

Paragraph 8.3.4 and 8.3.5: It is unclear if these specs have been approved by the public transport team.

Policy MC3: Both residential and commercial developments should provide cycle parking in line with County Council standards.

Paragraph 8.3.13: Standards in the table are not consistent with County Council parking standards.

Paragraph 8.3.14: The reference to ‘no parking provision’ should be consistent with paragraphs 7.1 and 7.2 of ‘*Oxfordshire County Council Parking Standards for New Developments*’.

Paragraph 8.3.18: EV charging should be provided in accordance with paragraphs 4.17-4.19 of ‘*OCC Parking Standards for New Developments*’.

District: South Oxfordshire

Consultation: Wallingford Neighbourhood Plan 2024-2035 (Submission Document)

Team: Place Planning and Coordination (South)

Officer's Name: [REDACTED]

Officer's Title: Transport Planner

Date: 16/07/2024

Place Planning (Transport) Comments

The Place Planning and Coordination (South) welcomes the review to the Wallingford Neighbourhood Plan, adopted in 2021, and is satisfied that a majority of the previously raised comments were addressed in submission document.

However, there are some points that are still outstanding, alongside other points raised.

1. **Policy MC1 Impact of development proposals on the public highway network.**
 - a. **MC1.1** - Change avoid congestion to mitigate congestion.
 - b. **MC1.2** - Change "adequate standard" to "an adoptable OCC standard" (as per MC4.1(g)) or reference national guidance such as LTN1/20 as to align more closely with the Vision for Wallingford, as set out in this document (to address the issue of a lack of cycling infrastructure in the town). It will also align to the OCC aspiration to develop an LCWIP for the town and its surrounding areas.
 - c. **MC1.3** - change the use of the word "adequate" to "an adoptable OCC standard", especially with regard to accessibility, this needs to be to a satisfactory standard to be more inclusive. No "adequate" infrastructure will aid the mitigation of new developments on the road network, it needs to be to a higher standard to encourage modal shift.
 - d. **MC1.4 (f)** - it must be noted that the OCC Street Design Guide and the OCC Parking Standards are two separate documents and are not mutually exclusive - the new parking standards should be applied over the street design guide.
2. **Policy MC4: Safe active travel.**
 - a. The recommendation to include the word "direct" was not heeded, it's part of the LTN 1/20 guidance to ensure that cycle infrastructure is direct to be more attractive to users and not exclude any of them.
 - b. **4.1(g)** - should any of the new roads, pedestrian routes and cycleways be built out by developers to a standard that could be adopted by the local highway authority.
3. **Policy CF1** - the mention of parking at the Sports Park should include **cycle** parking to ensure alignment with the Vision and the desire to align with the OCC's Active Travel Strategy (**10.1.7**).
4. **Policy MC5**
 - a. **5.1** - remove the word "minimum" and include the updated table from the OCC Parking Standards guidance, which has since been updated following the WNP adoption in 2021

5. **“10.1.8: Wallingford TC will work with OCC and other partners to improve safe, active travel opportunities for everyone, including people using mobility aids. This will be achieved through initiatives including the following:”** perhaps rephrase this to "to provide safe and inclusive active travel opportunities" as inclusive is not limited to those using mobility aids but also those with pushchairs/buggies, those who may not need an aid but need more time or space when moving around etc.

Looking again at the NDP review, there are other comments that have been noted.

2.4.9 lays out the issues in Wallingford that need addressing, which include topics such as a declining retail function, poor pedestrian and cycle routes in parts of the town, limited public transport connectivity around the town and to larger centres. However, amongst these issues raised is the “lack of parking” available. This is not an issue within the County Council’s Local Transport and Connectivity Plan nor one that will help to address the other issues laid out in this document. Perhaps this should be rephrased to address the lack of accessibility in central Wallingford, especially for those with a blue badge. It is also contradictory to the issues and aspirations laid out here; the pedestrianisation and removal of through traffic through the market square will be that much harder to achieve if more private cars are entering the town to access parking.

2.6 site allocation - Winterbrook Meadows

- WS2.1(a) – ensure pedestrian **AND CYCLE** crossing
- WS2.1(b) - any cycle links here need to be LTN 1/20 compliant

7.7 CAR PARKING

- **Policy TC5.1** - developments proposals in Wallingford Town Centre that would result in the loss of public or private car parking spaces will not be supported unless the proposal concerned demonstrates that it will create at least the same number of spaces as will be lost elsewhere within the town centre.

By emphasising the importance of car parking over the improvements to public transport and active, there is a contradiction to the focus on the climate emergency and the desire for active travel provisions, as well as those concerns raised about the air quality in the high street area caused by the volume of traffic as laid out in this neighbourhood plan. Further to this, it also contradicts OCC’s LTCP.

If the parking were to increase in central Wallingford, this would increase the number of vehicles entering into the town and adding to the congestion. This, coupled with the aspiration to close and pedestrianise the town square area, would only put the rest of the network at risk of congestion and air quality issues.

District: South Oxfordshire

Consultation: Wallingford Neighbourhood Plan 2024-2035 (Submission Document)

Team: OCC Property

Officer's Name: [REDACTED]

Officer's Title: Senior Planner,

Date: 08/07/2024

Property Comments

The Oxfordshire County Council (OCC) Property has reviewed the Wallingford Neighbourhood Plan (NP) Submission Document and notes that the comments made on 26th February 2024 in regards to the proposed amendments to paragraph 7.7.4 have been taken into account by the NP Steering Group and the last sentence was deleted. OCC Property would therefore like to make no further comments.

District: South Oxfordshire

Consultation: Wallingford Neighbourhood Plan 2024-2035 (Submission Document)

Team: Public Health

Officer's Name: [REDACTED]

Officer's Title: Health Improvement Practitioner

Date: 22/07/2024

Public Health Comments

The Public Health team welcomes the opportunity to comment on the revised version of the Wallingford Neighbourhood Plan. Our comments reflect the Plan's impact on human health and how any previous comments have been addressed.

Chapter 2 - Strategy for Wallingford: We note the inclusion of Green Network, provision of open spaces accessible for all, and provision of facilities for people to meet outdoors within policy WS1. However, we reiterate our previous comments that the specific mitigations required to address the climate emergency should be referenced, including 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.

We support the additional information provided in policy WS2 surrounding the need for the proposed medical centre to allow space for a hub facility for the delivery of medical and health services, and for possible expansion to meet longer term needs. We also note within this policy that where land was previously set aside for a school (and now to be assigned to a medical practice), any additional land will be prioritised for specialist housing for older people. This is strongly supported, especially since Wallingford has an ageing population.

We support the inclusion of tree/hedgerow protection and for there to be no unacceptable impacts on the biodiversity and flood resilience of watercourses within policy WS3.

Chapter 5 – Natural Environment: We note that 'wheeling' remains omitted from the Plan in reference to the potential users of green corridors. Wayfinding signage is also an important aspect of improving public rights of way to ensure they are well-used.

Response 10: ID ANON-DDCF-ZVNU-4

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-23 22:18:13

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Mobility Issues Group Wallingford (MIGWAL)

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Postal town:

Post code:

[REDACTED]

Telephone number:

Email:

migwal.group@gmail.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

We generally support the neighbourhood plan and feel that it goes a good way towards improving access for people with mobility difficulties who live in, or visit, Wallingford. We would have preferred the commitment to improving access to be more specific and robust, such as having an overall strategy for access improvements across the town.

We note that our comments to the previous consultation were considered useful, and have been appropriately responded to. We particularly appreciate changes to wording that have been made as a result of our comments.

The working group response to some of our comments was to state that 'the Equality Act and Building Regulations would ensure access improvements wherever physically possible'. This has never been our experience. Building Regulations help with things such as appropriate dimensions for disabled toilets, but they do not cover everything and are not perfect in themselves. For example, the disabled toilet guidance is based on someone using a manual chair, meaning that some people who use power chairs are still unable to access disabled toilets that are built to the correct specifications according to the regulations. We are asking for specific commitments on access improvements throughout the Neighbourhood Plan because simply relying on building regulations is not enough to guarantee truly inclusive access.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

We would like to see WS1 include a clause specifically about improving access to the town overall. There is only mention of green spaces being 'accessible for all'. Improving access should be part of the local strategy as this will benefit businesses in terms of maintaining and increasing footfall, promote community participation, and help attract tourists. We suggest the following clause to be added:

'Development proposals will be supported, as appropriate to their scale and nature, where they positively: '

- improve on, or provide for the first time, inclusive access for disabled and older people

MC4.1(h) we would like to see reference to the government guidelines we provided a link to, along similar lines to the way DfT guidance is referenced in MC04.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

████, Other (please specify below)

Other, please specify:

████████████████

Response 11: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 09:54

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Senior Planner

Organisation (if relevant):

Stantec

Organisation representing (if relevant):

L&Q Estates

Address line 1:

The Blade

Address line 2:

Abbey Square

Address line 3:

Postal town:

Reading

Post code:

RG1 3BE

Telephone number:

01189523175

Email:

[REDACTED]@stantec.com

Part B - Your comments

3 Please provide your comments below.

Your Comments:

****EXTERNAL****

On behalf of our client, L&Q Estates Ltd, please find attached representations to the Wallingford Neighbourhood Plan Review Consultation.

Please confirm that these representations have been received and that they have been registered as having been duly made.

Kind regards,

[REDACTED]

[REDACTED]

Senior Planner

Direct: +44 1189523175

[REDACTED]@stantec.com

Stantec
The Blade, Abbey Square
Reading RG1 3BE

You can upload supporting evidence here:
No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:
No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Date: 24/07/2024

Our Ref: 333100960

Planning Policy
Abbey House
Abbey Close
Abingdon
OX14 3JE
South Oxfordshire District Council

BY EMAIL: planning.policy@southandvale.gov.uk

Dear Sir / Madam,

**WALLINGFORD NEIGHBOURHOOD PLAN REVIEW (SODC CONSULTATION) ON BEHALF OF L&Q ESTATES LTD
NORTH WALLINGFORD**

We write on behalf of our Client, L&Q Estates Limited ('L&Q Estates') in response to the Wallingford Neighbourhood Plan Review ('WNPR') South Oxfordshire District Council ('SODC') consultation on the submitted WNPR document and supporting documents.

L&Q Estates, part of the L&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&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 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, more importantly, there does not appear to be any indications of the programme for the WNPR 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 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 was published as part of the Regulation 14 consultation. In the context of the JLP, our Client 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 Statement¹ 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 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.

¹ [Written statements - Written questions, answers and statements - UK Parliament](#)

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 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 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 8.2.3 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 is addition is inconsistent with the policy requirements of TRANS5 (ii) of the Adopted South Oxfordshire Local Plan.

MC4.1(b) at Regulation 14 stage included additional wording that sought to ensure “*where provision is made it needs to ensure that the route is always kept clear for this purpose and not blocked or encroached*”. Whilst our client agrees with the principle of this, it was unclear how this policy would be applied in practice. We recommended that this is not taken forward as part of any WNPR and it appears to have been deleted within the submission version.

Last, it was noted that an additional MC4.2 policy criteria had been added to the policy at Regulation 14 stage. This proposal appeared to be a placeholder for policies that would be developed. It was not clear when this was proposed to be done and whether they would meet the requirements of the Basic Conditions. It is noted that this criteria has also not been pursued as part of the submission version.

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 the revised Neighbourhood Plan. 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 recommended 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’.

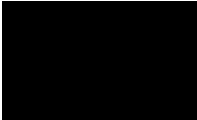
Our client will continue to promote Land north of Wilding Road, Wallingford for inclusion in the JLP as a flexible opportunity that can deliver early within the plan period as either a smaller, standalone, allocation or in collaboration with neighbouring land that is being promoted by Croudace Homes 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:

- Being sustainably located adjacent to a first-tier settlement in Wallingford;
- 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;
- Delivery of a mix of housing types and tenure, including affordable housing provision;
- New public open space and community infrastructure provision as part of a landscape-led masterplan;
- The potential to provide on-site services and facilities including a primary school, local retail, and community space;

- High sustainability standards, including use of new technologies, local materials, and imaginative architecture rooted the local vernacular; and
- Integrated green 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.

Yours sincerely,




Senior Planner
STANTEC UK LIMITED



LEGEND

- SITE BOUNDARY
- OWNERSHIP BOUNDARY



PROJECT TITLE
 LAND AT WANTAGE ROAD, WALLINGFORD

DRAWING TITLE
 LAND CONTROL PLAN

ISSUED BY	London	T: 020 7620 1453
DATE	OCT 2021	DRAWN JH
SCALE@A3	1:7500	CHECKED BS
STATUS	FINAL	APPROVED BS
DWG. NO.	D2516_447_REVB	

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Wallingford Northern Gateway

June 2022



Croudace
HOMES.CO.UK

L&Q
ESTATES



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2.0	Our vision	6
3.0	The site	9
4.0	Design approach	14
5.0	Design Principles	26



“First life, then spaces, then
buildings - the other way
around never works.”

Jan Gehl



1.0

Who we are

WORKING IN PARTNERSHIP

Wallingford Northern Gateway is an exciting opportunity for meeting pressing needs for new homes in a sustainable way, in a location which is within walking distance of the centre of the thriving market town of Wallingford. In this vision document, we show how circa 1,500 homes, a country park, neighbourhood centre and a 2 FE primary school can be sustainably accommodated in this accessible location, in one of South Oxfordshire's best served settlements.

Croudace and L&Q Estates are committed to working in partnership to bring forward the Wallingford Northern Gateway in a holistic and considered approach to this important sustainable urban extension.

CROUDACE

Croudace is a private family-owned company, founded in 1946. We have an excellent track record of successfully promoting strategic land for development. Our team has the expertise and experience necessary to deliver high quality, sustainable neighbourhoods. We are committed to the whole process,

from site identification, right through to building and selling the homes, giving us expertise across the whole development cycle.

Croudace is committed to building quality places and works hard to develop positive and constructive relationships with local authorities, stakeholders and the community. We take care to design our masterplans to meet the needs of local people, and recognise that consideration of the environment is of ever increasing importance.

We take our responsibility towards the immediate and wider community seriously, incorporating play areas and sports facilities, hosting community fun days and events, and raising money for charity - all part of our commitment to ensure our developments are desirable and social places to make a home.

Croudace design and build new homes to suit all budgets and we set ourselves high standards for the design and build quality of our developments, whilst also ensuring they fit well in their local environment. Using creative solutions and working to exacting standards ensures our superbly designed homes and landscapes create places of enduring value, and Wallingford will be no exception.

L&Q ESTATES

L&Q Estates has been in the business of identifying, promoting and acquiring land for over 60 years. Throughout this journey we have gained experience of working with a wide range of people, creating communities that work for everyone. With significant financial resources, combined with the experience and expertise to assemble land, promote and secure planning and deliver the infrastructure required, L&Q Estates is at the forefront of facilitating much-needed housing and commercial development in the UK.

L&Q Estates emerged out of L&Q's takeover of Gallagher Estates back in 2017 and retains all the expertise, acquired over the previous 60 years, in unlocking and delivering strategic development sites. All the returns made by L&Q Estates are recycled back into L&Q Group to aid the further delivery of much needed affordable housing, particularly around London and the South East.

Our portfolio contains developments ranging from 25 to 6,500 houses. In every case our approach is individually tailored to meet the unique placemaking requirements of the site but in all cases retains the underlying philosophy to deliver exceptional quality developments.

2.0

Our vision

The vision for the site is simple. To create a vibrant new integrated community, providing an attractive northern gateway to the town. To achieve this vision, the neighbourhood will offer a blend of inspirational architecture, well-maintained landscape and open space, new foot and cycle connections, a new link between Wallingford Road and Shillingford Road, new education provision and more.

The site will be physically, socially and environmentally sustainable. Transport will be provided via a choice of movement and modes, ensuring good access through the development and the adjacent neighbourhoods, and beyond. Low carbon development and sustainable energy principles will be promoted throughout the scheme as will green infrastructure.

The new neighbourhood will have a clear identity and character and create a place in which people will aspire to live. The design will provide robust and adaptable buildings and a positive response to the characteristics of the site and area, including the open countryside to the

north and east, and the surrounding residential communities.

There will be an appropriate and sustainable mix of uses, including a range of tenures and types of housing, and an appropriate breadth of facilities, amenities and social infrastructure, as required.

Croudace and L&Q Estates take care to design new places which meet the needs of local people and recognise that the environment is of ever increasing importance. At the site, our high standards and sustainable credentials will combine to create a place that stands the test of time. Good governance and management of the neighbourhood will be crucial to its success, and residents will have the opportunity to become involved in this process.





■ SITE BOUNDARY
■ OWNERSHIP BOUNDARY

TO A4074,
OXFORD

SEVERALLS
FARM

SHILLINGFORD ROAD

CROUDACE

BRIGHTWELL-
CUM-SOTWELL

L&Q ESTATES

WANTAGE ROAD

CALVIN THOMAS WAY A130

WALLINGFORD

RIVER THAMES

TO A4074,
READING



3.0

The site

Wallingford is a market town in the district of South Oxfordshire. It is regarded as one of the four most sustainable settlements in the district, along with Didcot, Thame and Henley. The town stands between Oxford (13 miles to the north) and Reading (14 miles to the south) close to the A4074 that connects the two.

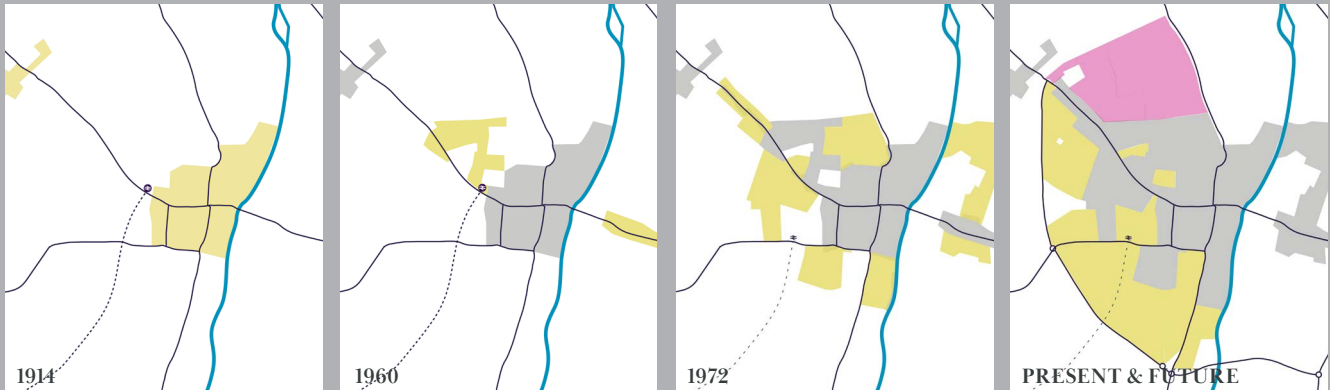
The immediate area is characterised by small towns and villages, many of which follow the course of the River Thames, which flows south past the eastern side of the town towards the Thames Estuary. Wallingford is constrained by adjacent AONBs and the River Thames to the east. The rural area surrounding the town forms a sensitive and valued landscape.

Brightwell-cum-Sotwell is the nearest settlement to the north-west of the site. The village is distinctly separate from Wallingford, although close to it. Both Brightwell-cum-Sotwell and Wallingford town centre contain Conservation Areas and listed buildings, however neither are in close proximity to the site.

Wallingford Northern Gateway is located to the north of the town, approximately 1.2km (0.75 miles) from the town centre. It abuts the northern built edge and is confined between Shillingford Road to the east, the rear of properties along Wantage Road to the west and open fields to the north, forming some 76.6 hectares (ha), or 189 acres. The site comprises land controlled by both Croudace (55 ha/136 acres) and L&Q Estates (21.6 ha/53 acres), all of which is currently arable farmland with no built structures.



THE SITE IS IN A SUSTAINABLE LOCATION, IN CLOSE PROXIMITY TO THE TOWN CENTRE



Wallingford has recently grown following the granting of planning permission for 85 homes at Winterbrook and for 134 homes on the former Habitat Warehouse site. In August 2019, planning permission was also granted for 502 homes at land to the north and south of Winterbrook Lane at the southern end of Wallingford. More locally to the site, planning permission was granted in October 2017 immediately south-west of the site for 555 homes, which is currently being built out.

The town has good public transport connections. A number of bus routes pass the site on both Wantage Road and Shillingford Road, with existing stops close to the site. Key destinations include Didcot, Oxford, Abingdon and Reading. The closest rail stations are Cholsey (3 miles south) and Didcot Parkway (6 miles west) both served by Great Western Rail, and both accessible via bus. Didcot Parkway benefits from faster connections, with a journey time of 15 minutes to Oxford, 30 minutes to Reading and 45 minutes to London Paddington.

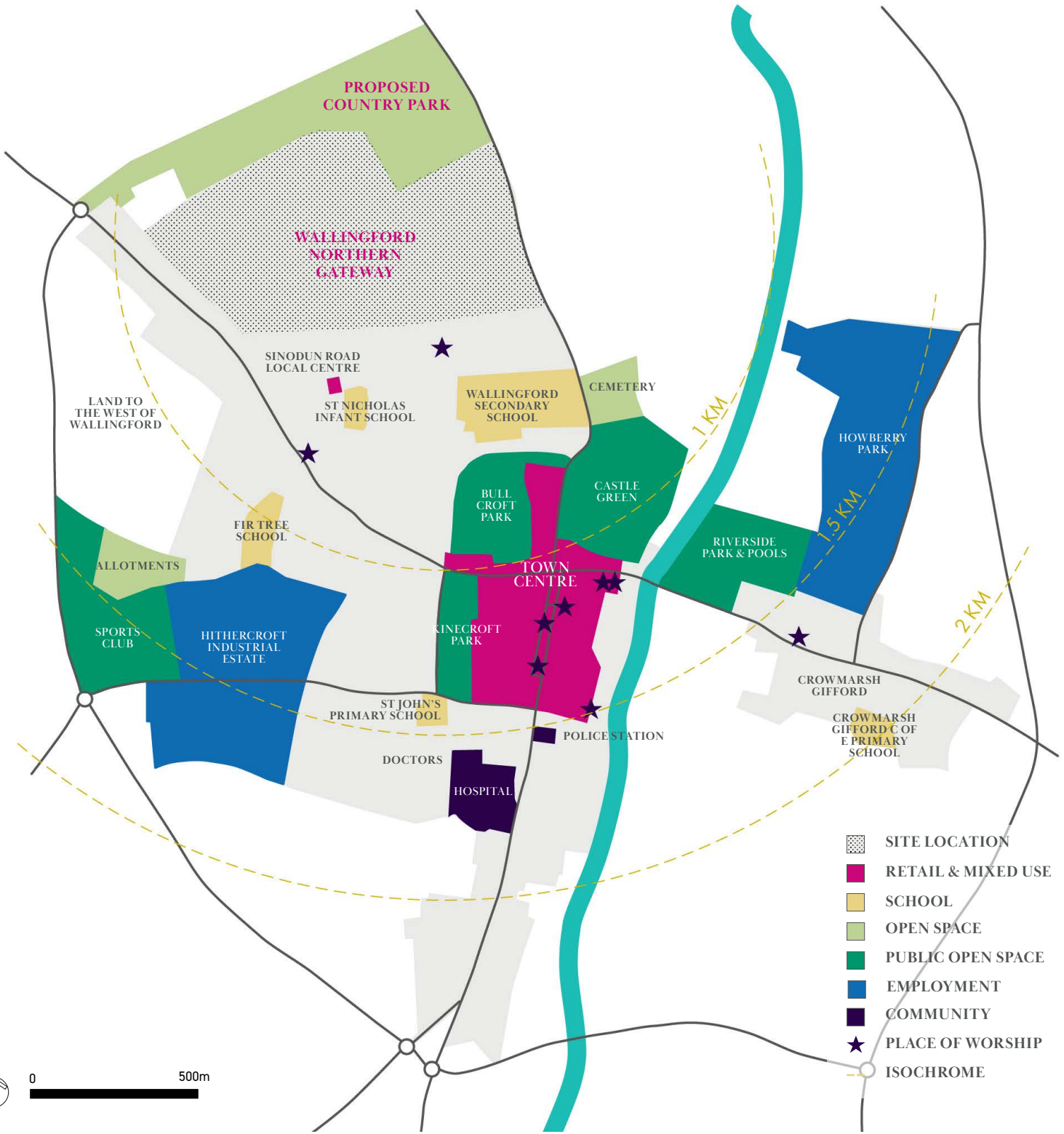
A SUSTAINABLE FUTURE










This document demonstrates the opportunity that exists for Wallingford to grow in a considered, beneficial and sustainable form, and we would like to work with the Wallingford Neighbourhood Plan Group, South Oxfordshire District Council, Oxfordshire Plan 2050 and the local community to shape a plan that meet the needs of the town.

The characteristics of the site are such that, through comprehensive masterplanning, a logical framework of development can be established, ensuring suitable residential densities within a generous network of open space. Furthermore, there is scope to ensure that variety in character is achieved across the site, as a direct result of existing characteristics of the town informing sustainable design principles.

Crucially, the site can genuinely connect to, and integrate with, Wallingford, so that its development would be complementary to the existing community facilities and employment opportunities that it would adjoin. Development at Wallingford Northern Gateway would form an integral part of the town and not a peripheral one, providing additional critical mass to support a vibrant town centre.

The site is well-located for a range of existing facilities, including the local centre on Sinodun Road, St Nicholas Infant School, Wallingford Secondary School, Wallingford Sports Park, Hithercroft Industrial Estate and Wallingford town centre. The facilities within the town centre include a museum, hotel, library, theatre and cinema, and a variety of shops, restaurants and pubs. These are easily accessible by foot and by bicycle along existing footpaths and cycle routes, and via the quiet residential streets.



-  SITE LOCATION
-  RETAIL & MIXED USE
-  SCHOOL
-  OPEN SPACE
-  PUBLIC OPEN SPACE
-  EMPLOYMENT
-  COMMUNITY
-  PLACE OF WORSHIP
-  ISOCHROME



OPPORTUNITIES & CONSTRAINTS

The site has a number of existing features and constraints that need to be considered as part of its development, including:

- The setting of the site in the wider landscape and the impact proposed development will have on views from public vantage points, in particular from the North Wessex AONB, which encircles the site to the north and east
- Exposed sloping ground lies to the north of the site
- The potential impact of development on local flora and fauna (including any protected species) and opportunities to enhance biodiversity
- The importance of ensuring that the proposed development is connected with the surrounding area, with appropriate provision for pedestrians, cyclists and motor vehicles
- The need to ensure that local infrastructure has the capacity to accommodate development
- The South Oxfordshire Local Plan 2035 (adopted 2020) identifies the site as a minerals safeguarding area. A specialist Minerals Assessment (February 2021) has shown that the mineral resources in this location is low quality and cannot viably be extracted, in part due to the impact extraction would have on nearby residential properties. It is worth noting that the previous Core Strategy (adopted 2012) identified this as a growth area.

The key opportunities afforded by the site are as follows:

- The site is located on the northern edge of Wallingford, to the east of the existing residential properties along Wantage Road. Development in this area would therefore extend no nearer to the neighbouring village of Brightwell-cum-Sotwell than the existing properties on Wantage Road near the Slade End roundabout. On the western side of Wantage Road, development behind the Wantage Road frontage has been allocated as site H3 in the South Oxfordshire Local Plan, accepting the principle that no unacceptable issue of coalescence with Brightwell-cum-Sotwell arises through building behind the Wantage Road frontage on this side of Wallingford
- The site is suitable for housing purposes and has the ability to deliver affordable housing as part of the development package
- It directly adjoins the existing settlement and is well-related to the existing facilities and services within Wallingford, accessible by walking, cycling or public transport. It is located approximately 10-20 minutes' walk from the well-preserved medieval centre, which contains a number of independent shops and restaurants, as well as access to a good range of facilities in terms of schools, health and recreation throughout the town
- The opportunity to deliver wider community benefits, including new public open space, a local centre and primary school
- Access directly onto the western bypass, taking through-traffic around the town, as well as the opportunity for multiple access points to be located along Shillingford Road. The site offers the opportunity to extend the existing bypass through the development
- The relatively flat topography with the existing woodland structure provides a mature landscape setting and screens views to the east, with potential for a new shelterbelt planting to the north
- The presence of a footpath aligned west to east parallel to the northern site boundary, which is joined by a second footpath from the north and provides access to Brightwell-cum-Sotwell
- The site's location within walking distance of the River Thames and proximity to the Chilterns and North Wessex Downs AONBs
- Proximity to a range of employment opportunities and links with the concentration of environmental science organisations at nearby Crowmarsh Gifford
- The ability to bring forward a comprehensive, planned development for Wallingford Northern Gateway, through the close collaboration between Croudace and L&Q Estates.



- | | | | | |
|------------------------|--------------------------------------|-------------------------------|---------------------------------|---------------------------------|
| SITE BOUNDARY | WALLINGFORD CASTLE MEADOWS | MAIN ROAD | NATIONAL CYCLE ROUTE 5 | POTENTIAL LOCAL CENTRE LOCATION |
| CROUDACE/L&Q BOUNDARY | SURFACE WATER FLOODING - LOW RISK | MINOR STREET | POTENTIAL CYCLE ROUTE | POTENTIAL SCHOOL LOCATION |
| DEVELOPABLE AREA | SURFACE WATER FLOODING - MEDIUM RISK | UNSCREENED BACK GARDEN FENCES | SUSTAINABLE LINK TO TOWN CENTRE | |
| EXISTING WOODLAND BELT | SURFACE WATER FLOODING - HIGH RISK | GREEN CORRIDOR | SPINE STREET | |
| PROPOSED OPEN SPACE | RIVER THAMES | PUBLIC RIGHT OF WAY | 20 MIN WALK TO TOWN CENTRE | |
| NORTH WESSEX AONB | TOWN CENTRE CONSERVATION AREA | PROPOSED PED/CYCLE LINK | | |

4.0

Design approach

In order to ensure that the principles of Garden Communities are injected into every aspect of the development at Wallingford Northern Gateway, the analogy of 'grow your village' has been applied, guiding the process of developing the masterplan as if it were an allotment. The stages are as follows:

- **Find your plot** - identifies the extent of land to be utilised for the new neighbourhood
- **Set your boundaries** - explores limiting factors to development
- **Sow communal gardens** - designing with a landscape approach establishes open spaces and green corridors at the outset
- **Add water** - incorporates existing water courses and sustainable drainage systems into the plan
- **Mark your rows** - carves out the movement network including pedestrian, cycle, public transport and vehicular
- **Set out your beds** - places neighbourhoods between the elements established above
- **Craft your core** - embeds neighbourhood centres into the site, including community, retail and recreational uses, and schools
- **Grow your village** - brings the previous seven steps together.

These are explored over the next few pages, and explain the design rationale behind the illustrative masterplan.

“The advantages of the most energetic and active town life, with all the beauty and delight of the country may be secured in perfect combination”

Ebenezer Howard, *Garden Cities of Tomorrow* 1898

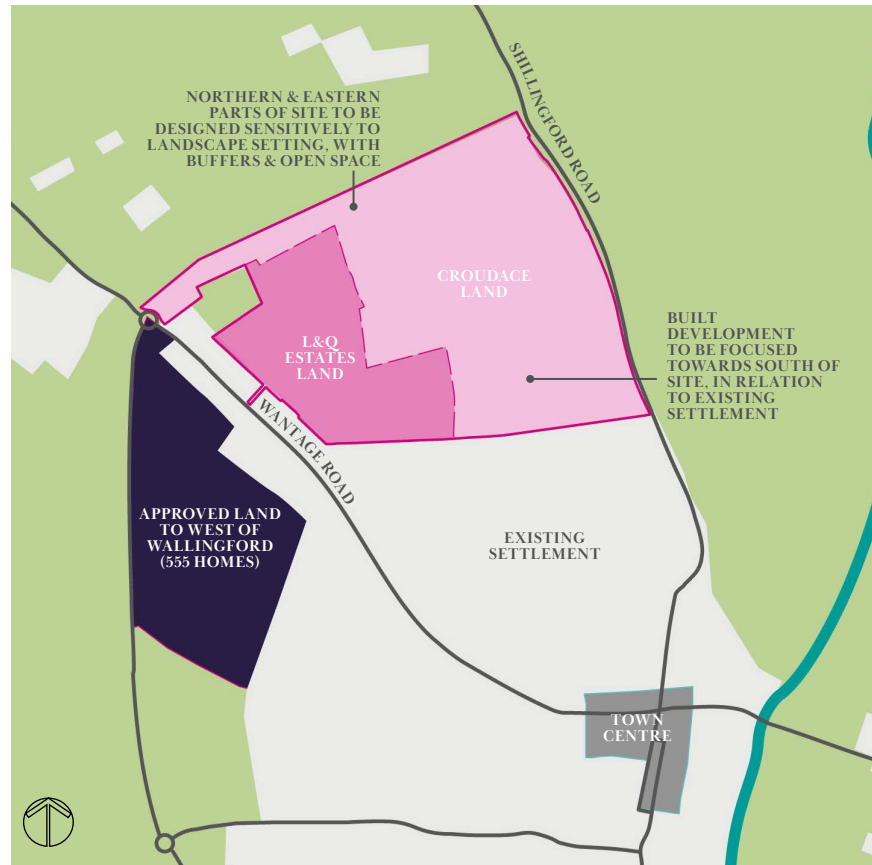


Grow your village

1. FIND YOUR PLOT

A 76-hectare site has been identified at the northern edge of Wallingford, within the ownership of Croudace and L&Q Estates. It lies between Shillingford Road to the east and Wantage Road to the west.

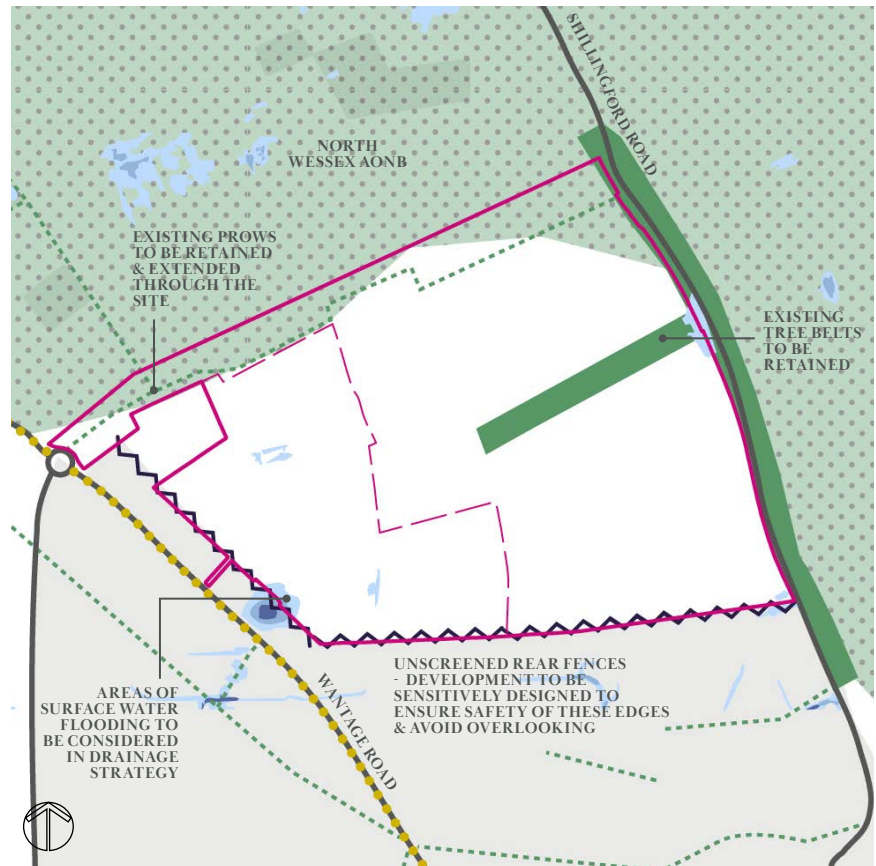
Residential development will naturally be focused towards the south of the site, at the existing edge of Wallingford, and the extents of the site ensure that the appropriate landscape buffers and extensive green separation can be safeguarded between the site and the countryside to the north, and that the land can be utilised to support ecology and enhance biodiversity, as part of a climatic response.



2. SET YOUR BOUNDARIES

The limits to development within the site are set by a series of factors including:

- Nearby landscape designations and existing landscape features, such as woodland blocks and topography, as well as views into and out of the site
- Existing footpaths through the site
- Surface water flood risk extents
- The existing settlement edge and proximity to existing residential back gardens.

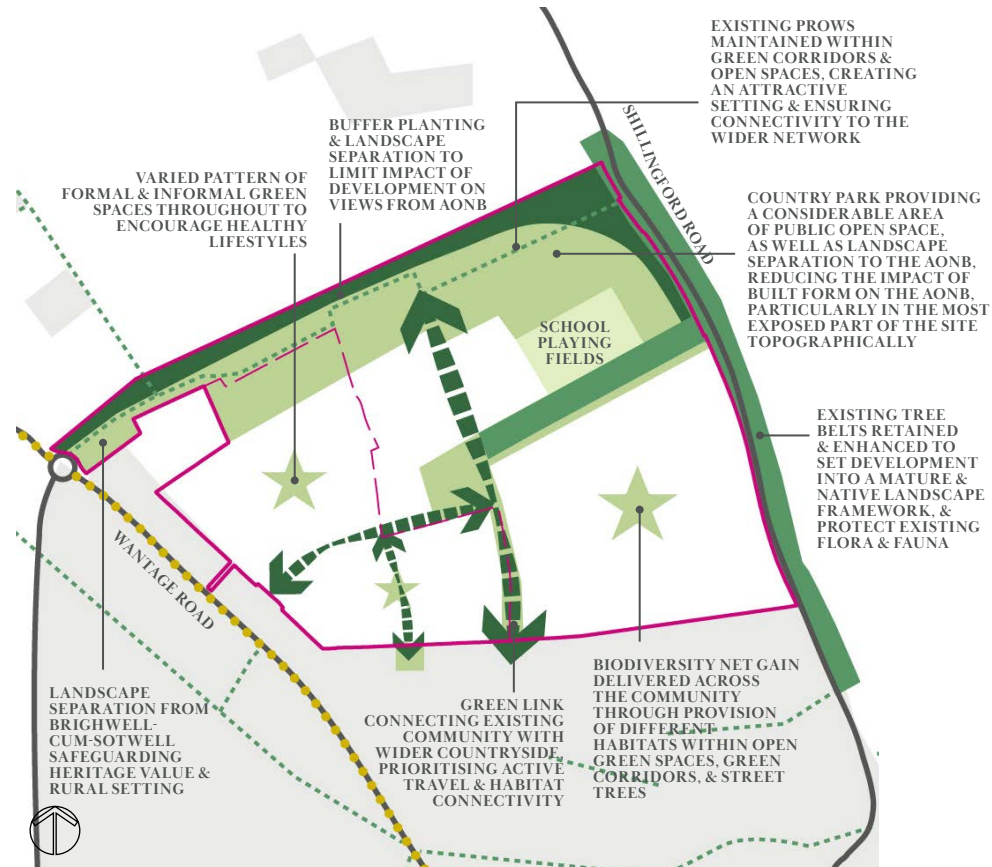


Grow your village

3. SOW COMMUNAL GARDENS

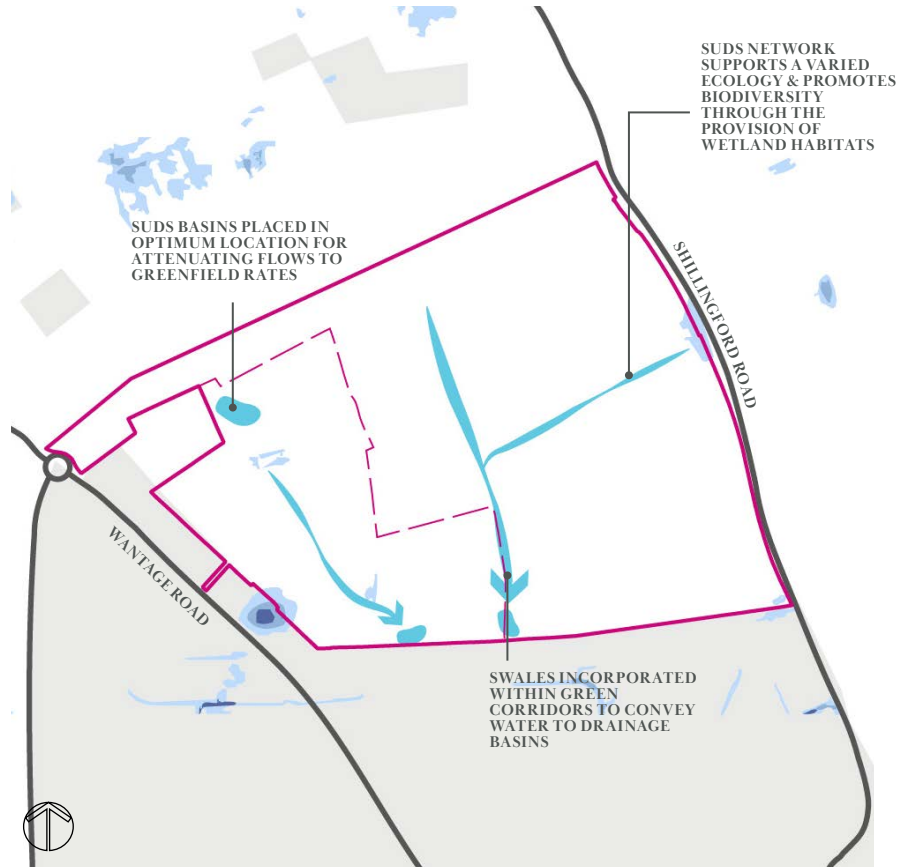
Leading with the landscape is fundamental to shaping a successful new neighbourhood. To minimise harm to the AONB and its setting, and create a landscape separation to Brightwell-cum-Sotwell, a landscape buffer has been firmly established to the north.

A central landscape corridor brings a swathe of green space through the centre of the site following the existing track, and providing connections for both humans and wildlife out to the countryside beyond, setting the site into its much wider green infrastructure network. These are complemented by a varied pattern of formal and informal green spaces throughout, encouraging healthy lifestyles and ensuring recreation and amenity space is in easy reach of all parts of the community.



4. ADD WATER

Nothing grows without water and the new development at Wallingford is no exception. Existing drainage flows and surface water flood risk will be incorporated into the plan. New waterbodies will be created to manage surface water drainage sustainably as well as support varied ecology and promote biodiversity net gain. This is another way that the development will embed resilience to climate change into its design.

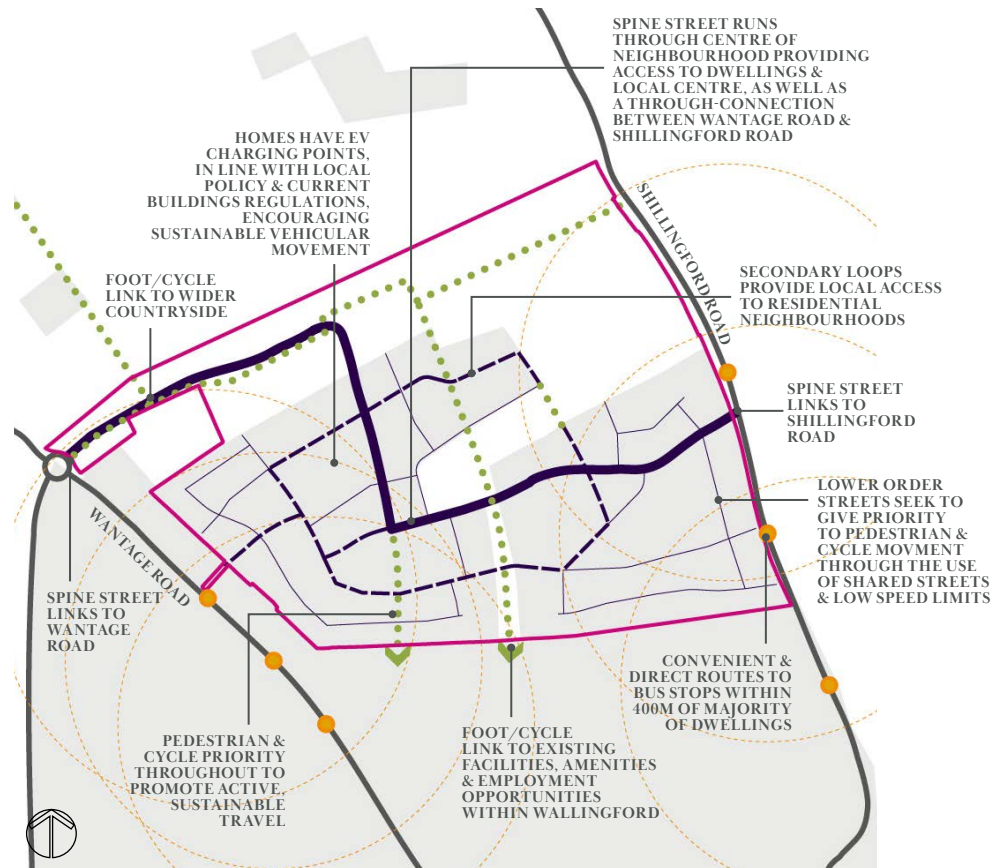


Grow your village

5. MARK YOUR ROWS

The movement network sits alongside the landscape structure, and together they form the key structuring elements of the plan. A new spine street flows through the heart of the community, linking Shillingford Road at the east to Wantage Road at the west. Between these, local routes provide access to the interior of the site and a connected network of pedestrian and cycle routes give low carbon modes priority.

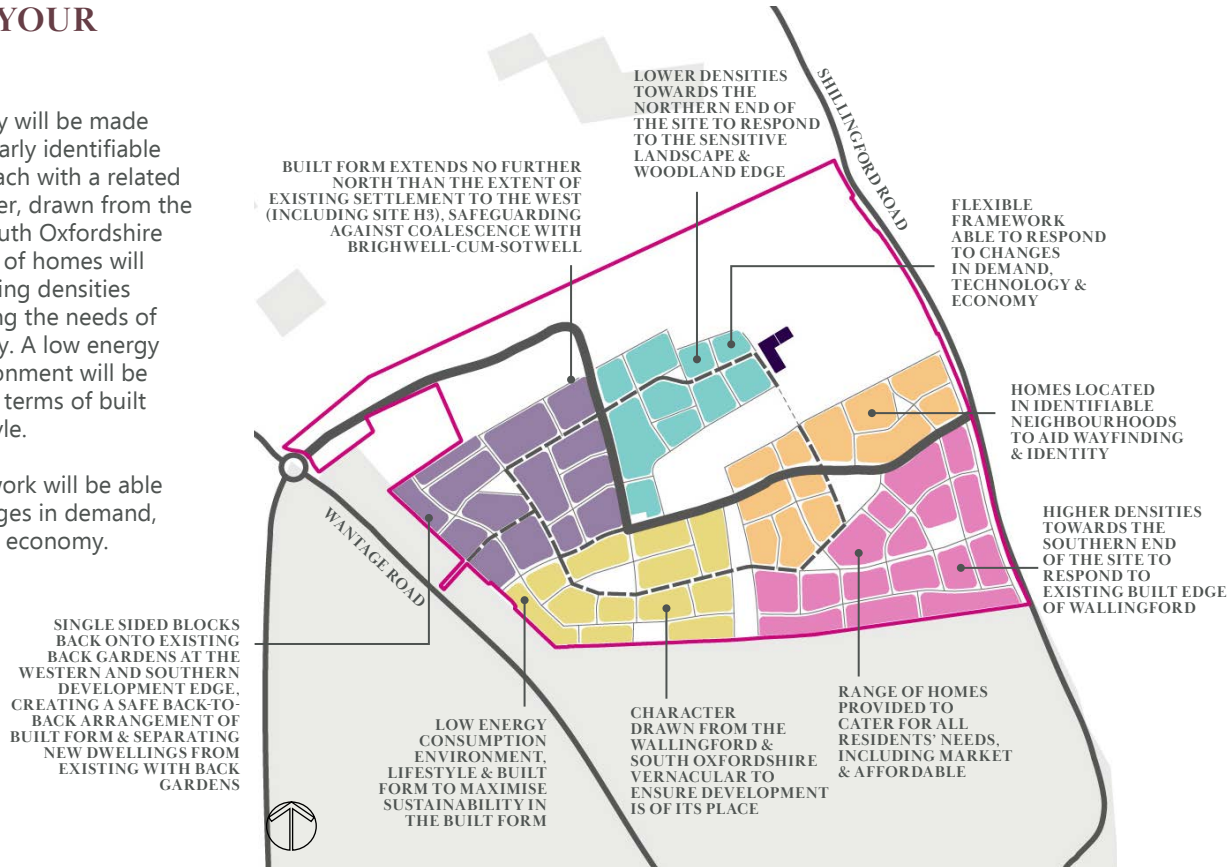
Existing bus stops along Wantage Road are within a 5-minute walk from the western part of the site. New bus stops on Shillingford Road could create the same walking distances from the east of the site, providing real travel alternatives to the private car.



6. SET OUT YOUR BEDS

The new community will be made up of a series of clearly identifiable neighbourhoods, each with a related but distinct character, drawn from the Wallingford and South Oxfordshire vernacular. A range of homes will be provided in varying densities and tenures, meeting the needs of the local community. A low energy consumption environment will be created, not only in terms of built form but also lifestyle.

This flexible framework will be able to respond to changes in demand, technology and the economy.

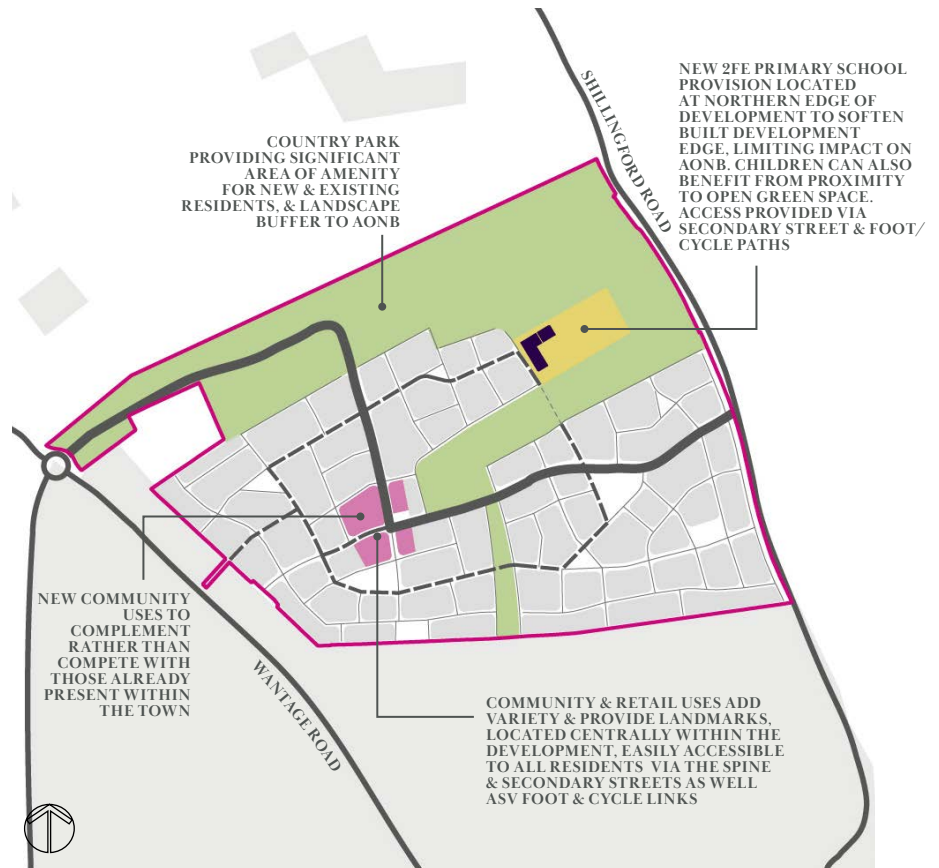


Grow your village

7. CRAFT YOUR CORE

A local centre will be created at the heart of the scheme, with facilities complementing rather than competing with those in the existing town centre. Whilst this may provide space for offices or shared work-spaces, technology will be embedded in all dwellings to accommodate home working, with homes designed to facilitate the post Covid-19 way of working.

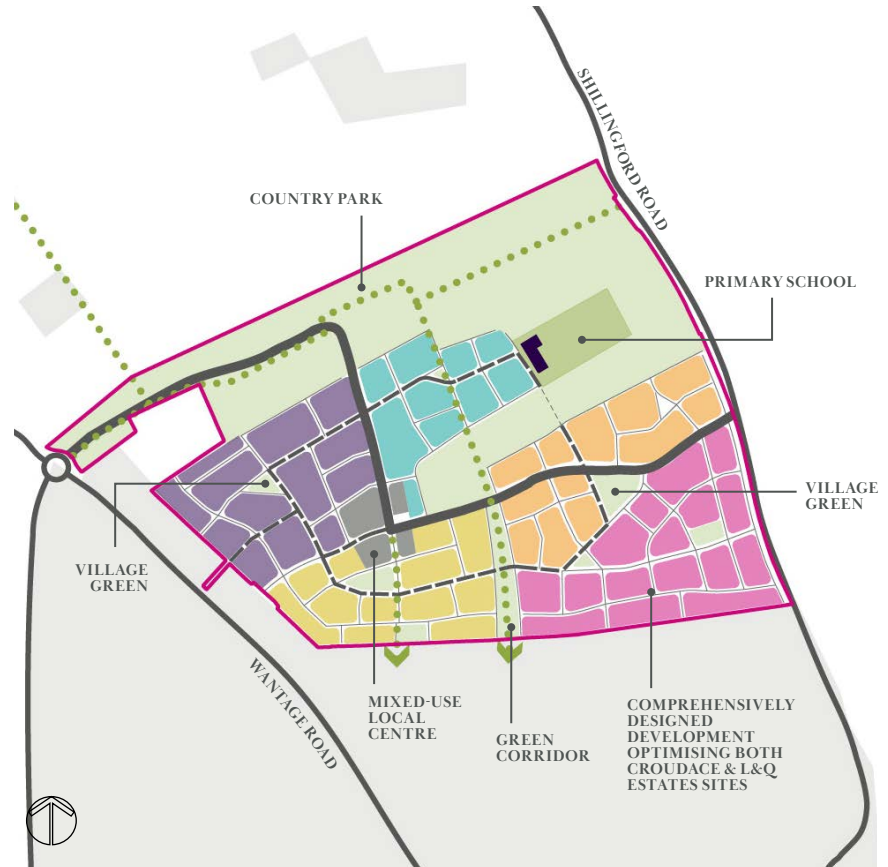
Community, retail and recreational uses will add variety and provide landmarks. A 2FE primary school will also be included within the scheme, providing vital education for the next generation.



8. GROW YOUR VILLAGE

The previous seven steps all come together to produce a well-considered, sustainable urban extension to Wallingford, which meets the needs of both current and future generations.

The comprehensive development of Croudace and L&Q Estate's Land enables the site to be shaped in an optimum way, locating the different land uses, open spaces, drainage strategy and streets in the most logical and beneficial locations.



THE CONCEPT

Wallingford Northern Gateway is ideally located to provide a sustainable extension to Wallingford. It is accessible to local infrastructure, services and facilities, within walking distance of the town centre.

It is considered that the masterplan allows for the provision of a balanced and sustainable community through the development of sustainable buildings, the use of sustainable transport, the accessibility of public open space within the development and the provision of a new local centre and primary school, providing benefits for both the new and existing community of Wallingford. The new development will also be in close proximity to the historic heart of Wallingford, providing heightened economic opportunities for the existing town centre and community uses it currently holds.

The site provides excellent potential to set out extensive social, environmental and economic benefits, including:

- Delivery of a high quality, mixed-use scheme, which assists in the delivery of higher values
- Potential provision of circa 1,580 new homes, including a range of types and tenures, from starter homes to older person living accommodation. The site also offers the opportunity to provide affordable housing
- Exploring the delivery of starter units to ensure that the community's young adults have the opportunity to enter the housing market. Similarly, homes suitable for 'downsizing' should also be explored, as well as spacious multi-generational homes
- Potential implementation of technology driven, energy positive homes, contributing to a net-zero carbon development
- Creation of a country park in the north-eastern part of the site, to mitigate the impact of the development on the AONB and its setting. This space will be publicly accessible and a valuable ecological and recreational resource for the neighbourhood, with the potential to incorporate formal sports pitches and community allotments
- Provision of a new village green at the centre of the new neighbourhood, as well as a number of smaller pocket parks ensuring green space is within close proximity of all dwellings, offering door-step play
- Improvements and new connections to the local public rights of way network and the potential provision of a new cycleway into the town centre
- Provision of a new two-form entry primary school within the site to provide for the wider community
- Provision of a new local centre offering community facilities in accordance with the priorities of Wallingford and as a result of an assessment of the socio-economic needs
- Commitment to a sustainable development, which aspires to be carbon net zero within the context of wider scheme viability.

-  SITE BOUNDARY
-  RESIDENTIAL PARCEL
-  2FE PRIMARY SCHOOL
-  LOCAL CENTRE
-  VILLAGE SQUARE
-  SPINE STREET
-  SECONDARY STREET
-  OTHER STREET
-  FOOTPATH
- 1 PRIMARY SITE ACCESS
- 2 SECONDARY SITE ACCESS
- 3 COUNTRY PARK
- 4 WOODLAND BUFFER
- 5 EXISTING WOODLAND BELT
- 6 VILLAGE GREEN WITH CHILDREN'S PLAY
- 7 COMMUNITY ORCHARD
- 8 GREEN CORRIDOR
- 9 EXTENSION TO EXISTING PLAY AREA
- 10 SUSTAINABLE DRAINAGE
- 11 PRIMARY SCHOOL SPORTS FIELD
- 12 CONNECTION TO EXISTING PUBLIC RIGHT OF WAY
- 13 POTENTIAL CYCLEWAY INTO TOWN CENTRE



BRIGHTEWELL-CUM-SOTWELL

LAND TO THE WEST OF WALLINGFORD (555 HOMES)

WALLINGFORD SCHOOL



5.0

Design principles

Comprehensively planning a new place, whether as a stand-alone village, a market town or an extension of an existing settlement, provides a unique opportunity to shape the physical form and social fabric of the community. In response to recent guidance, 'Building Better, Building Beautiful', the masterplan for Wallingford Northern Gateway will provide a blueprint to guide the vision and create a sense of place at this important extension to the town.

The aspirations for the new neighbourhood are set out below. It is important to remember the holistic objective of these principles. Taken together, they form an indivisible and interlocking framework for the delivery of a high-quality place:

- The creation of a vibrant, prosperous, self-sustaining, diverse community, which fosters well-being and healthy lives for people of all ages and is fully integrated with the surrounding community, providing links to existing and new schools, employment, community uses, retail, public open space and the wider network of walking and cycling routes. Additionally, ensure

easy access from the existing communities to the proposed school, local centre, allotments and open space, offering the existing residents the same benefits as the new development

- A strong design character should run throughout the urban extension. It should be of exemplary quality and innovative design, featuring the application of the highest sustainability standards, use of local and sustainable new materials, and high quality imaginative architecture, making use of expert craftsmanship and rooted in the local vernacular, celebrating its beauty, so that it is 'of Wallingford'
- The sustainable urban extension should sit within an attractive and well-maintained external environment that reflects and enhances its location. The new community should echo Oxfordshire's high quality of life, in order to make the new community a major attractor for both residents and businesses
- The new neighbourhood should become a place of enduring quality and choice. It should meet the lifestyle and housing aspirations of successive generations and remain popular for decades to come. It should offer a mix of house types and tenures, creating a balanced community
- The new neighbourhood, which is likely to be developed progressively over several years, should have the flexibility to adapt to market conditions.





LIVING LOCALLY

The world has changed, and change presents opportunity. The Covid-19 pandemic has revealed a different way of living and working that will echo long into the future. Many people now enjoy and expect a different, more balanced and flexible way of living and working. People have rediscovered the enjoyment of 'living locally' with doorstep access to parks, green spaces and other facilities including local food, shops and schools now high up the agenda for homebuyers.

The concept of 'living locally' is at the heart of our proposals and is designed to meet resident's shifted needs in a post pandemic world. The living locally concept seeks to create 'everyday neighbourhoods', places where residents do not have to travel far to meet their daily needs, creating truly sustainable places to live.

Our proposal will allow people of all ages and abilities to grow their own food, enjoy outdoor opportunities for health and wellbeing, walk to the local shop and school, work comfortably from home, participate in local social networks, and converse with neighbours.

Landscapes that promote health, wellbeing & sustainable living

There is evidence associating the quality of the built and natural environments with the health and wellbeing of communities. Wallingford Northern Gateway provide a range of high-quality landscapes to promote health and wellbeing, including:

- Door-step food production
- Sensory gardens
- Children's play areas
- Opportunities for social interaction
- Seating areas
- Re-naturing and wetland areas allowing habitats to develop naturally over time
- Biodiversity net-gain
- Improvements to natural capital.

Everyday neighbourhoods

A series of walkable neighbourhoods will be linked by a network of walking and cycling routes, which connect into surrounding public rights of way. This will allow residents the opportunity to walk or cycle to the town centre, primary schools, leisure resources of the surrounding countryside and other key local facilities.

New homes for everyone

The new neighbourhood will offer a large variety of house types and tenures, to suit a wide range of households, including those looking to get on the housing ladder, buy a family home or downsize. Accessible and adaptable homes will enable people to stay as their needs change. The scheme will look to support a shift to home working and aim to be future-proofed for flexible working arrangements.

ACHIEVING SUSTAINABLE DEVELOPMENT

Sustainable development can, and has been, defined in many ways by many different organisations.

Sustainable development is at the forefront of national policy, set as a golden thread running throughout the National Planning Policy Framework (2021) and SODCs' own Climate Change Declaration. We believe that the principles set out by the United Nations Sustainable Development Goals (SDGs) provide a comprehensive framework and should be a key consideration in the design and delivery of any new development where possible. The SDGs provide an ideal and globally agreed set of targets to measure the success of achieving sustainable development.

What are United Nations Sustainability Development Goals?

In January 2015, the United Nations General Assembly began the negotiation process on the post-2015 development agenda. The process culminated in the subsequent adoption of the 2030 Agenda for Sustainable Development, with 17 SDGs at its core by all UN member states.

The 2030 Agenda for Sustainable Development provides a shared blueprint for peace and prosperity

for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

CLIMATE CHANGE

Mitigation

Climate change mitigation means reducing our impact on the climate as far as possible. The emerging proposals aim to respond positively to this key issue by:

- Offering new and existing residents a realistic alternative to private car use through creating a new 'walkable and cyclable' neighbourhood
- Locating employment opportunities, retail and community facilities, and attractive public spaces within a walkable neighbourhood that will discourage the need for private car use
- Creating increased and enhanced pedestrian and cycle links to better connect the surrounding area

- Adapting to new technologies and sustainability standards – realising the opportunities facilitated by a larger scale of development
- Incorporating renewable energy and smart solutions to energy efficiency through the use of photovoltaics and micro-renewables focused on community buildings and employment areas where larger roof expanses can aid greener solutions.

Adaption

Climate change adaption means ensuring that communities can evolve as our climate changes, to more extreme weather, a hotter climate, and a changing ecology. The emerging proposals aim to respond positively to this key issue by:

- Creating new areas of woodland planting to contribute towards carbon offsetting within the site – areas close to the watercourse, public open spaces and local village greens all provide the opportunity for significant tree planting
- Providing opportunities for growing food, through allotments, orchards and edible species
- Providing areas for Sustainable Urban Drainage through attenuation ponds that are able to more sustainably manage water run off and storage.



SUSTAINABLE DEVELOPMENT GOALS





LIVING WITHIN NATURE

Living within nature and wildlife is fundamental to wellbeing and it should be embedded into Wallingford Northern Gateway, with easy access to recreational green space and wildlife, and links to the wider countryside.

Given the need to build greater resilience to climate change,

the urban extension should be characterised by a landscape structure of multi-functional green infrastructure, including a new country park, green corridors and public open space, productive landscape and private or shared gardens associated with homes.

As a minimum (and including private gardens), 30% of the total site area should be allocated to green space (of which at least half

should be public). Ample space should be allocated to allow local food production from community, allotment and/or commercial gardens. Walking and cycling links should connect the new community with the rest of Wallingford, promoting active travel choices and enhancing health and wellbeing.

The new community should be a place in which human development positively enhances the natural



environment, providing biodiversity net gain and using zero-carbon and energy-positive technology wherever possible to ensure climate resilience, as well as being water efficient. Another important element pertaining to climate change is water and sustainable drainage. The topography of the site lends itself to the creation of a natural network of streams and drains, to be incorporated into a comprehensive sustainable drainage strategy. The waterways should align strongly with

the open spaces and green corridors, which will allow natural flow of water to occur and mitigate any increase in surface water arising from risk from the new neighbourhood. Incorporating aquatic habitats into the development will also increase the biodiversity net-gain within the site.

The community's extensive green space should serve the dual purpose of creating an attractive environment and offering a high quality of life,

whilst also serving as a valuable tool in climate change adaptation and mitigation.

LENTEN HOUSE
16 LENTEN STREET
ALTON
HAMPSHIRE
GU34 1HG

FIRST FLOOR STUDIO
THE OLD SCHOOL
EXTON STREET
LONDON
SE1 8UE

FABRIKUK.COM

PRODUCED BY

fabrik

FOR CROUDACE &
L&Q ESTATES
JUNE 2022

Land North of Wallingford

Conceptual Masterplan

 Site Boundary


Land Use

 Residential (c11.8ha - c370 units @35dph @90%)

 Public Open Space/Green Corridors (c7ha)

Movement

 Potential Primary Movement Route

 Vehicular Site Access

 Pedestrian Site Access

 Public Rights of Way

 Active Travel Routes



1:3,500 @ A3



Response 12: ID ANON-DDCF-ZVNB-H

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 11:59:06

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Mrs

Name:

Wendy Somerville

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

█

Address line 2:

██████████

Address line 3:

Postal town:

Wallingford

Post code:

██████████

Telephone number:

██████████

Email:

████████████████████

Part B - Your comments

3 Please provide your comments below.

Your Comments:

It is vital that before any additional housing is built that the provision for Doctors, Dentists, schools has been put in place.

The effect of all of these additional houses is not sustainable unless we have the services to support the housing needs.

No regard has been given to the residents of the Reading Road who now basically have a highway outside their homes.

Additional thought should be given to how we can move traffic around on the ring road, to take the burden off the Wantage Road, St John's road and the Reading Road.

Traffic noise is now constant day and night on the these roads and it is impacting our well being.

The housing should also be suitable and sustainable.

The impact of additional traffic must be addressed.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

[REDACTED]

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

I don't know

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

[REDACTED]

Other, please specify:

Response 13: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 16:21

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agency

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):
Principal Planner

Organisation (if relevant):
Boyer Planning

Organisation representing (if relevant):
Croudace Homes

Address line 1:
Crowthorne House

Address line 2:
Nine Mile Ride

Address line 3:
Wokingham

Postal town:

Post code:
RG40 3GZ

Telephone number:
01344 753129

Email:
[REDACTED]@boyerplanning.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir / Madam,

Representations to the Wallingford Neighbourhood Plan Review Reg 16 Consultation obo Croudace Homes

On behalf of my client, Croudace Homes, I am pleased to submit our representations to the Wallingford Neighbourhood Plan Review Regulation 16 consultation (see attached), which closes on Thursday 25 July 2024.

I would be grateful if you could confirm receipt of the submission.

Kind regards,

[REDACTED]

Principal Planner

T
01344 753 129

M
[REDACTED]

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4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:



Wallingford Neighbourhood Plan Review, Regulation 16

Land West of Shillingford Road, Wallingford

Boyer

Prepared on behalf of Croudace Homes | July 24

REPORT CONTROL

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1. INTRODUCTION

1.1 Boyer has prepared these representations on behalf of Croudace Homes Ltd ('Croudace'), in response to the Wallingford Neighbourhood Plan Review ('WNPR') Consultation (June - July 2024), undertaken by South Oxfordshire District Council ('SODC') pursuant to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

Scope of Representations

1.2 These representations are made in the context of Croudace's 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 address topics within the WNPR consultation, and its supporting evidence base, accordingly.

1.3 Our comments relate to the extent to which the proposed WNPR meets the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. Our comments also highlight where opportunities exist that we believe would enhance the clarity of the Plan and facilitate its implementation as an effective development management tool.

1.4 In doing so, our comments also highlight the opportunities that are presented by new development, including the proposals at the Land West of Shillingford Road, Wallingford. Accordingly, the following sections of these representations are set out as follows:

- **Section 2:** Legal and Policy Context
- **Section 3:** Response to the Draft Neighbourhood Plan
- **Section 4:** Evidence-Base
- **Section 5:** Conclusion

1.5 We trust that our comments are of assistance to the Council and the Independent Examiner undertaking the examination of the Neighbourhood Plan pursuant to Regulation 17 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

2. LEGAL AND POLICY CONTEXT

Overview

- 2.1 Planning Practice Guidance ('PPG') provides that Neighbourhood Plans represent a mechanism that allows local people to plan for the types of development that will meet their community's needs. PPG is also clear that Neighbourhood Plans must align with the strategic needs and priorities of the wider local area (as defined through adopted and emerging Local Plans, and the associated evidence base).

Basic Conditions

- 2.2 Once submitted for independent examination, under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the regulations'), it must be demonstrated that the Neighbourhood Plan 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 is the role of an Independent Examiner to consider whether the draft Neighbourhood Plan meets the basic conditions. In order to meet the basic conditions, the making (adoption) of the Neighbourhood Plan must (in summary):
- be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan; and
 - not breach, and must be otherwise compatible with international obligations.

Regard to National Policy

- 2.4 A Neighbourhood Plan must have regard to the National Planning Policy Framework ('NPPF') (December 2023) and associated guidance.
- 2.5 Paragraph 11 of the NPPF is clear that '*...plans and decisions should apply a presumption in favour of sustainable development*'. In the context of plan-making, this means that:

'...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...' (emphasis added); and

'...strategic policies [which a Neighbourhood Plan must support] 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...'

2.6 In this respect, NPPF Paragraph 13 states that:

'The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning.

Neighbourhood plans should:

- *Support the delivery of strategic policies contained in local plans or spatial development strategies; and,*
- *Should shape and direct development that is outside of these strategic policies'* (emphasis added).

2.7 NPPF Paragraph 29 further reiterates the need for Neighbourhood Plans to be aligned with the strategic needs and priorities of the wider local area. It states that: '*...Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*' (emphasis added). This is supported by NPPF footnote 16 which states: '*Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area*'.

2.8 Pursuant to this, PPG further clarifies that 'regard to national policy' means that a '*Neighbourhood Plan or Order must not constrain the delivery of important national policy objectives*'¹ (emphasis added).

2.9 In addition, Neighbourhood Plans are also required to provide sufficient clarity to enable their policies to fulfil their intended development management role. Moreover, such policies must relate specifically to the unique circumstances of the neighbourhood area. This means that Neighbourhood Plan policies should not duplicate general Local Plan policies. This is set out in PPG, wherein:

*'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared'*² (emphasis added).

¹ Planning Practice Guidance. Paragraph: 069 Reference ID: 41-069-20140306.

² Planning Practice Guidance. Paragraph: 041; Reference ID: 41-041-20140306.

- 2.10 PPG further specifies that there has to be robust evidence to support particular policies, as may be proposed in a Neighbourhood Plan. It is not permissible to rely on conjecture or assertions. In this regard the PPG states that:

'While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order...'³ (emphasis added).

- 2.11 Specifically in relation to policies that are relevant to housing supply, PPG is clear that:

'Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need' (emphasis added)⁴.

Contribution to the Achievement of Sustainable Development

- 2.12 The NPPF is clear that all plan-making should contribute to and help to achieve sustainable development. Sustainable development is defined at NPPF paragraph 8. It encompasses three overarching objectives - environmental, economic and social:

- 'a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.*

³ Planning Practice Guidance. Paragraph 040 Reference ID: 41-040-20160211.

⁴ *Ibid.*

- 2.13 Neighbourhood Plans should therefore contribute to improvements to the three dimensions of sustainable development. This requirement is outlined in the PPG, which adds that:

'This basic condition [contributing to sustainable development] is consistent with the planning principle that all plan-making and decision-making should help to achieve sustainable development. A qualifying body should demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures)' (emphasis added).

- 2.14 In order to demonstrate that a draft neighbourhood plan contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan guides development to sustainable solutions'⁵.

Conformity with the Strategic Policies in the Development Plan of the Local Area

- 2.15 The Development Plan for the Neighbourhood Plan Area currently comprises the South Oxfordshire Local Plan (2011 – 2035) ('SOLP'), which was adopted on 10 December 2020⁶.

- 2.16 SODC is also working in coordination with Vale of White Horse District Council to prepare a Joint Local Plan ('JLP') to guide development in both local authority areas up to 2041. In this regard, a Regulation 18 'Issues and Options' consultation on the JLP took place between 12 May and 23 June 2022; with another Regulation 18 'Preferred Options' consultation taking place between 10 January to 26 February 2024.

- 2.17 Whilst it is possible for the NP to proceed to referendum and be 'made' prior to the emerging Joint Local Plan being adopted, the PPG clarifies that:

'...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, up-to-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'⁷.

- 2.18 In considering the primary policy objective of achieving of sustainable development, it is also entirely possible (as indicated at PPG Paragraph 103; Reference ID 41-103-20190509) for a Neighbourhood Plan to propose housing growth at a level exceeding the requirement identified by the LPA in the adopted Local Plan. This may well be a suitable approach, where the allocation of additional housing can create further social, economic or environmental benefits which are sought in the Neighbourhood Plan.

⁵ Planning Practice Guidance. Paragraph 072. Reference ID: 41-072-20190509.

⁶ Available online at: <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/02/SODC-LP2035-Publication-Feb-2021.pdf>.

⁷ Planning Practice Guidance. Paragraph: 009. Reference ID: 41-009-20190509.

Modification of the Wallingford Neighbourhood Plan

- 2.19 The Wallingford Neighbourhood Plan (2021) ('WNP') was made as part of the District Council's Development Plan on 20 May 2021.
- 2.20 There is no requirement to review or update a made neighbourhood plan. However, 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.
- 2.21 In this regard, it is unclear what the purpose of the Wallingford Neighbourhood Plan Review is. For the purposes of Paragraphs 14 and 76 of the NPPF (2023), neither the South Oxfordshire Local Plan ('SOLP') (2020) nor the WNP (2021) are considered to be '*out of date*' by virtue of their date of adoption. There is no obvious need, therefore, to embark on an update to the WNP (2021) at the present time.
- 2.22 Furthermore, SODC is currently working on an emerging Joint Local Plan which is set to be adopted in the near future. As detailed later in these representations, the examiner's report for the WNP (2021) was clear that a review of the plan should not be necessary prior to the adoption of a new emerging plan.
- 2.23 In reviewing and 're-making' this Neighbourhood Plan, the principal aim appears to re-engage the provisions of Paragraph 14 of the NPPF for an extended period, which as set out further in these representations would be detrimental to the achievement of sustainable development in South Oxfordshire.
- 2.24 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'⁸ (emphasis added).*
- 2.25 There are three processes through which a neighbourhood plan or order can be modified⁹. The appropriate process to be pursued in modifying a Neighbourhood Plan or Order relates to the degree of change which the proposed modification involved.
- 2.26 PPG confirms that proposals for minor (non-material) modifications to a neighbourhood plan or order can be made without undertaking an examination or referendum on the modified plan proposal. However, proposals which include material modifications to the neighbourhood plan or order require an examination of the plan by an Independent Examiner. Furthermore, material modifications which change the nature of the plan or order would require both examination and a referendum.

⁸ *Ibid.*

⁹ Planning Practice Guidance (April 2023) Paragraph: 106 Reference ID: 41-106-20190509.

3. RESPONSE TO THE DRAFT NEIGHBOURHOOD PLAN

Overview

- 3.1 There are several flaws, conflicts, and omissions, within the Wallingford Neighbourhood Plan Review ('WNPR') document 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).
- 3.2 In this section, several areas of concern with the reviewed Plan are discussed, alongside our recommendations to resolve such issues, are discussed. Our comments relate to issues wherein the WNPR conflicts directly with the basic conditions, being:
- 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

Clarity of Consultation Practice

- 3.3 South Oxfordshire District Council ('SODC') is undertaking a consultation on a Neighbourhood Plan modification proposal. However, the WNPR consultation document does not clearly indicate where the proposed modifications are being made, with respect to the currently made Wallingford Neighbourhood Plan.
- 3.4 Whilst a 'Modifications Statement' has been provided, which summarises the areas in which changes have been made, it does not provide a table listing the specific modifications. It is challenging, therefore, to identify exactly where modifications are proposed within the WNPR. In our view, the consultation document is therefore insufficient in setting out clearly where changes have been made as part of the modifications to the Plan proposal.
- 3.5 To rectify this issue, further consultation should be undertaken on the basis of a document which clearly indicates the precise changes that have been made as part of the proposal to modify the Plan.

Factual Errors - Sustainability

- 3.6 Notwithstanding the difficulties associated with identifying and reviewing these amendments, it is clear that several amendments have been made within the WNPR that suggest further housing development at Wallingford would be 'unsustainable'. An example is found at Paragraph 2.5.17, wherein the WNPR states that additional housing at Wallingford '*...would be unsustainable since a number of essential services and facilities do not have capacity to support further housing development*'. This and similar claims are entirely unsubstantiated and should be deleted.
- 3.7 Having assessed the sustainability of settlements across the District, SODC categorised Wallingford as one of South Oxfordshire's Market Towns, which comprise the highest-order

tier of the District's adopted settlement hierarchy. Clearly, Wallingford is one of the most sustainable places in South Oxfordshire to accommodate new housing development.

- 3.8 Including these comments would present a clear conflict with the District's Spatial Strategy as set out in the adopted Development Plan. Accordingly, such references should be deleted, given the highly sustainable nature of the settlement as a location for new development.
- 3.9 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.
- 3.10 Suggestion that further housing development would be 'unsustainable' is entirely inconsistent with the District's adopted spatial strategy, the commentary set out in the WNPR, and could incite confusion for decision-makers as to the sustainability of the settlement. Such references must be deleted for the plan to meet the basic conditions.

Need for / Timing of a Neighbourhood Plan Review

- 3.11 PPG is clear that there is no requirement to review and/or update a Neighbourhood Plan, as set out previously. Indeed, several situations are referenced in PPG that would make a Plan proposal 'out-of-date', including where a Neighbourhood Plan policy conflicts with a local plan that is adopted thereafter.
- 3.12 The WNP was made in 2021. As noted previously, it is unclear what the purpose of the Wallingford Neighbourhood Plan Review is serving. There is no obvious need to embark on an update to the WNP (2021) at the present time. In reviewing and 're-making' this Neighbourhood Plan, the principal aim appears to re-engage the provisions of Paragraph 14 of the NPPF for an extended period, which as set out further in these representations, would be detrimental to the achievement of sustainable development in South Oxfordshire.
- 3.13 The Examiner's report for the WNP specifically recommended, at paragraph 7.29, that any 'made' neighbourhood plan is reviewed at a time to correspond with the review of the local plan. This is to ensure that the two plans remain complementary in their approaches; and to allow for the WNP evidence-base to be reassessed and reviewed to take account of potential readjustments in the overall delivery of housing in the town and any specific changes in local housing need.
- 3.14 Notwithstanding this, the WNPR has been submitted in advance of the JLP, which has only 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.
- 3.15 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 meets the Basic Conditions.

- 3.16 Furthermore, the Labour Government has recently made several announcements that indicate a step-change in national planning policy is to be expected within the immediate short term. The WNPR must be considered within the context of the direction of national planning policy and therefore we would expect that an examination is undertaken prior to referendum, to ensure that the WNPR has due regard to national planning policy.

The Achievement of Sustainable Development

- 3.17 The WNPR fails to contribute toward the achievement of sustainable development, and it is not in general conformity with the strategic policies of the development plan. In these regards, the WNPR does not meet the basic conditions as currently formulated, as set out below.
- 3.18 As previously identified, Wallingford comprises one of the highest tier and most sustainable settlements in the District, to which the spatial strategy seeks to direct the majority of the District's overall development needs to 2035 outside of the housing allocation at Didcot.
- 3.19 The adopted South Oxfordshire Local Plan ('SOLP') Policy STRAT2: South Oxfordshire Housing and Employment Requirements commits the District to meeting the Objectively Assessed Housing Need ('OAHN') of 18,600 new homes up to 2035, in addition to providing a further 4,950 new homes to assist in meeting unmet need arising from Oxford City. Consequently, the total housing requirement for the plan period is 23,550 new homes.
- 3.20 In this context, it is pertinent that DLUHC Live Table 122 records the delivery of +10,043 new homes in South Oxfordshire over the adopted SOLP period to date (2011/12 to 2022/23). Given an annual housing requirement of 900 homes, over the 12-year period, there has been a requirement for +10,800 homes over this period. Therefore, there is a current shortfall of some -757 homes within the District to date against the cumulative target.
- 3.21 Furthermore, SODC's latest evidence in relation to its forward-looking Five-Year Housing Land Supply, published September 2023, indicates that -at best- the Council does not expect to meet its housing requirement up to 2027/28, resulting in a further underprovision of housing by some -864 homes.
- 3.22 The District Council is therefore, to date, not meeting its overall housing needs throughout the plan period by a significant amount. Clearly, on the basis of SODC's own evidence, this trend is set to continue over the next five-year period. To meet its development needs, South Oxfordshire is therefore reliant upon windfall (i.e., not allocated at the time of adoption) development sites coming forward prior to the close of the plan period.
- 3.23 The adopted Local Plan (2011 – 2035) recognises the need for windfall development to come forward during the plan period, specifically accounting for it within the housing trajectory. The SOLP also seeks to direct development toward the most sustainable settlements in the District, including Wallingford. Wallingford is therefore in a prime position to accommodate such windfall development within the plan period to assist in meeting this current shortfall.
- 3.24 The omission of any additional residential-led site allocations within the WNPR means that the plan proposal does not contribute toward sustainable development, nor does it support

the SOLP in meeting the District's wider housing needs. Indeed, by reviewing the plan, the Council has introduced restrictive policies (such as Policy WS3.2) that seek to constrain further development at Wallingford outside of the defined built-up-area.

- 3.25 Given that the District is reliant upon windfall development to meet its housing needs (which are assumed to be required in adopted policy, and have to date provided some 1,338 dwellings toward the District's overall housing delivery¹⁰), the making of the WNPR, as proposed, would actively undermine the District's adopted spatial strategy and undermine the achievement of sustainable development, therein fundamentally conflicting with the basic conditions.
- 3.26 Indeed, SOLP Policy H3: Housing in the Towns of Henley-on-Thames, Thame and Wallingford sets out a minimum housing requirement for the three market towns, including Wallingford. The policy is clear that there should be at least 1,070 homes delivered within Wallingford to 2035, based on a simple calculation of +15% growth from 2011 plus existing commitments at the point of adoption.
- 3.27 The supporting text to Policy H3 notes that each of the Towns, including Wallingford is expected to deliver at least +15% growth of housing stock in additional to existing commitments from the Core Strategy. Furthermore, this figure doesn't account for an assessment of need for specialist accommodation (including affordable housing, and specialist accommodation for older persons), which must also be provided for.
- 3.28 In this regard, it specifically identifies that each town's Neighbourhood Development Plan must explore opportunities to address local needs and provide allocations to meet or exceed (as would be the case for Wallingford) the minimum requirements in Policy H3.
- 3.29 Policy H3 (2) also requires that Neighbourhood Development Plans for the market towns '*...should seek to meet demonstrable local needs, for example for specialist and/or affordable housing, even where this would result in housing provision in excess of the outstanding requirement shown in Table 4d*'... (emphasis added).
- 3.30 The Wallingford Neighbourhood Plan Review has failed allocate any additional sites to exceed the minimum requirement set out in Policy H3, or to sufficiently assess the extent of need for specialist and/or affordable housing and to provide for this within an additional housing allocation. The WNPR is therefore not consistent with the SOLP in this regard and does not meet the basic conditions on this basis.

Taking Account of the Latest and Up-to-Date Evidence of Housing Need

- 3.31 PPG is clear that:

'Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these

¹⁰ South Oxfordshire District Council (2023) Five-Year Housing Land Supply Position Statement. Refer to Table 4.20.

policies should take account of latest and up-to-date evidence of housing need'

(emphasis added)¹¹.

- 3.32 Despite this, the WNPR has not taken account of the latest and up-to-date evidence, either in the form of updating the Wallingford Housing Need Assessment (2019), nor with respect to the emerging JLP evidence-base or evidence of housing need generated elsewhere. In failing to take account of updated evidence of housing need, the WNPR does not meet the basic conditions, insofar as it fails to have due regard to national guidance.
- 3.33 There is evidence of a significantly increased need for housing within South Oxfordshire, in the form of the evidence base prepared on behalf of Oxford City Council (Housing and Economic Needs Assessment December 2022) and other matters such as house price inflation over the last five years. In this regard, it is our view that significantly more housing provision will need to be identified through the JLP plan-making process and should include additional growth at the most sustainable settlements, including Wallingford.
- 3.34 The WNPR must therefore 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).

Policy WS2: The Land Allocation for Housing in Wallingford

- 3.35 The Land North of A4130, Wallingford Bypass ('Winterbrook Meadows'), benefits from outline and detailed planning permission and is currently being built-out by Berkeley Homes. Retaining this policy is unnecessary, not justified, and is likely to introduce confusion for decision-makers. It should be removed from the WNPR to reflect the site's current status.
- 3.36 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.
- 3.37 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. As the WNPR notes, at paragraph 2.6.2, '*During spring 2024, GPs from Wallingford Medical Practice are working with Berkeley Homes to prepare a joint planning application for the site*'.
- 3.38 Clearly, the transition of the land to a GP Practice can appropriately be dealt with outside of the need for a site allocation specifically for the use. Indeed, if the application is unsuccessful, the transition to another alternative community use may be required again.
- 3.39 Berkeley confirmed in its response to the WNPR Regulation 14 Consultation that '*... Whilst we support the proposed use on this site, it is not viable for the whole 5 acres to be allocated as medical use...*' (emphasis added).

¹¹ *Ibid.*

- 3.40 Furthermore, Policy Criteria WS2.2 notes that the allocation is for '*...a medical centre, with the possibility of some housing...*'. However, given that the overall allocation remains for 502 dwellings, which already benefit from planning permission, there is an inherent conflict within the policy in this regard.
- 3.41 Retaining Policy WS2.2 evokes confusion for a decision-maker; is the land allocated for 502 dwellings, or is there a possibility for more? If there is, how many more would be appropriate? The use of this land is best dealt with via the planning application process, where the need for community uses can be explored in detail with an appropriate level of scrutiny over the evidence.
- 3.42 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.
- 3.43 In reviewing and 're-making' the Neighbourhood Plan with Policy WS2 included, decision makers may perceive this to re-engage the provisions of Paragraph 14 for a further five-year period. This would stifle sustainable development from coming forward at Wallingford and ensure that identified housing needs would continue to go un-met moving forward.
- 3.44 Furthermore, this situation would be significantly detrimental to the achievement of sustainable development at the South Oxfordshire District scale; development that is clearly needed in the District would not be capable of being accommodated at one of the District's most sustainable locations, in direct conflict with the adopted Spatial Strategy.
- 3.45 This is particularly concerning as Policy WS2 simply reflects an existing commitment, rather than new allocations that are encouraged under Policy H3 of the SOLP. It is imperative therefore that to avoid confusion Policy WS2 should be deleted and a new housing allocation identified.
- 3.46 Removing Policy WS2 would be consistent with the approach that the WNPR has taken with respect to Policy EE1, which has been '*...removed in the WNP 2024 Review because Site C has been developed and is now Verda Park*'.

Policy WS3: Development Within the Built-up Area

- 3.47 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.
- 3.48 However, the proposed addition of Criteria 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.
- 3.49 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, and sought in the Neighbourhood Plan. 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.

- 3.50 Consequently, the addition of Criteria WS3.2 constrains opportunities to provide for a sufficient amount of family housing, affordable housing, and specialist accommodation for older persons at Wallingford. National guidance is clear that the 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 means that the plan cannot meet the basic conditions.
- 3.51 The addition of Criteria WS3.2 is also in conflict with the adopted Development Plan. SOLP Policy H1 is clear that development on non-allocated sites (whether in the countryside or otherwise) will be supported in a range of circumstances, many of which would not be considered to be *'appropriate to a countryside location'*.
- 3.52 Furthermore, SOLP Policy H3 is clear that 1,070 new homes is a minimum housing requirement for Wallingford, and that at least this number of new homes should be delivered during the plan period. Indeed, Policy H3(2) is clear that Neighbourhood Plans for the market towns should seek to meet demonstrable needs *'...even where this would result in housing provision in excess of the outstanding requirement...'*.
- 3.53 There is an inherent tension therefore both within Criteria 3.2 itself, and a conflict with the Development Plan, that therefore must be resolved; either by deleting *'...appropriate to a countryside location and are...'*, or simply removing the criteria in its entirety.
- 3.54 As previously intimated, the emerging Joint Local Plan 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 the achievement of sustainable development.
- 3.55 Proposed policy criteria WS3.2 must therefore be deleted, to ensure there is sufficient flexibility to accommodate new family, affordable, and specialist housing at Wallingford over the lifetime of the plan period, and to ensure that the WNPR is consistent with the adopted Development Plan Policies H1 and H3.
- 3.56 Alternatively, the criteria could be amended to support appropriate development at sites that are 'adjacent to' the settlement edge, providing that these support the vision of the neighbourhood plan and Local Plan and conform with other policies within the WNPR.

The Extent of Modifications to the Plan

- 3.57 Furthermore, the addition of this Policy criteria would patently change the relationship of the Policy with a substantial extent of the Neighbourhood Area. The introduction of policy that actively seeks to constrain development in all areas outside of the settlement area clearly constitutes a material amendment that changes the nature of the plan.

- 3.58 Consequently, if this proposed amendment is retained, the WNPR would in our view be required to progress through both an Examination and Referendum before it could be appropriately 'made'.

Housing for Older and Disabled People

- 3.59 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 the settlement has a '*...good range of facilities and access to public transport...*', making it a sustainable location for development.
- 3.60 In the Regulation 14 iteration of the plan, the conclusion of this review was that there may be a shortfall by 2031. However, in the Regulation 16 iteration, this conclusion is simply absent. Instead, there is a statement that need is met 'in the short term', which is completely at odds with the Regulation 14 version of the plan.
- 3.61 If there is indeed sufficient supply of specialist housing in Wallingford in the short term, there is surely no need for the allocation for specialist accommodation as part of Policy WS2. There is a fundamental inconsistency here that needs to be resolved.
- 3.62 Policy WS2 should be deleted in its entirety given that there is an extant planning permission in place for the site that is well underway in being delivered; it being retained would cause confusion for decision-makers and introduce ambiguity to the WNPR.
- 3.63 To be consistent with SOLP Policy H3, as set out previously, the WNPR must undertake an assessment of specialist accommodation needs and seek to meet those needs via additional housing allocations '*...even where this would result in housing provision in excess of the outstanding requirement...*'.
- 3.64 Indeed, supporting text to SOLP Policy H3 is clear at paragraph 4.14 that '*...The NDP, or review of the made NDP, for each town must explore opportunities to address local needs and provide allocations to meet or exceed the minimum requirements in Policy H3.*' In the case of Wallingford, the review of the NDP must explore opportunities to exceed the minimum requirements of Policy H3 as there is no outstanding commitment to 'meet'.
- 3.65 Plainly, the WNPR has failed to undertake this and therefore clearly has not had regard to, and is inconsistent with, the adopted development plan for the District. On this basis, the WNPR patently cannot be considered to meet the basic conditions and must be revisited accordingly.
- 3.66** 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, should there be a demonstrated need. Specific allocation of residential-led development at this site could assist in meeting the identified need Specialist Accommodation for Older Persons (C2/C3) at Wallingford.

4. EVIDENCE-BASE

Strategic Environmental Assessment ('SEA')

Overview

- 4.1 The WNPR relies upon the assessment and conclusions of the SEA (2020). The SEA (2020) includes out-of-date and inaccurate information relating to the suitability of the Land at Shillingford Road (Site A2) for development.
- 4.2 Concerns regarding various technical elements led to the site being screened from allocation as part of the original WNP plan-making process, despite it otherwise being considered favourably by the Town Council. These technical elements have been addressed and evidence provided to confirm the inaccuracies, and the SEA (2020) must be updated to reflect this evidence.
- 4.3 The WNPR's reliance upon an out-of-date and demonstrably incorrect Strategic Environmental Assessment means that the WNPR does not have due regard to national guidance, does not promote sustainable development, and therefore does not meet the Basic Conditions. The reasons for this are set out below.

SEA (2020)

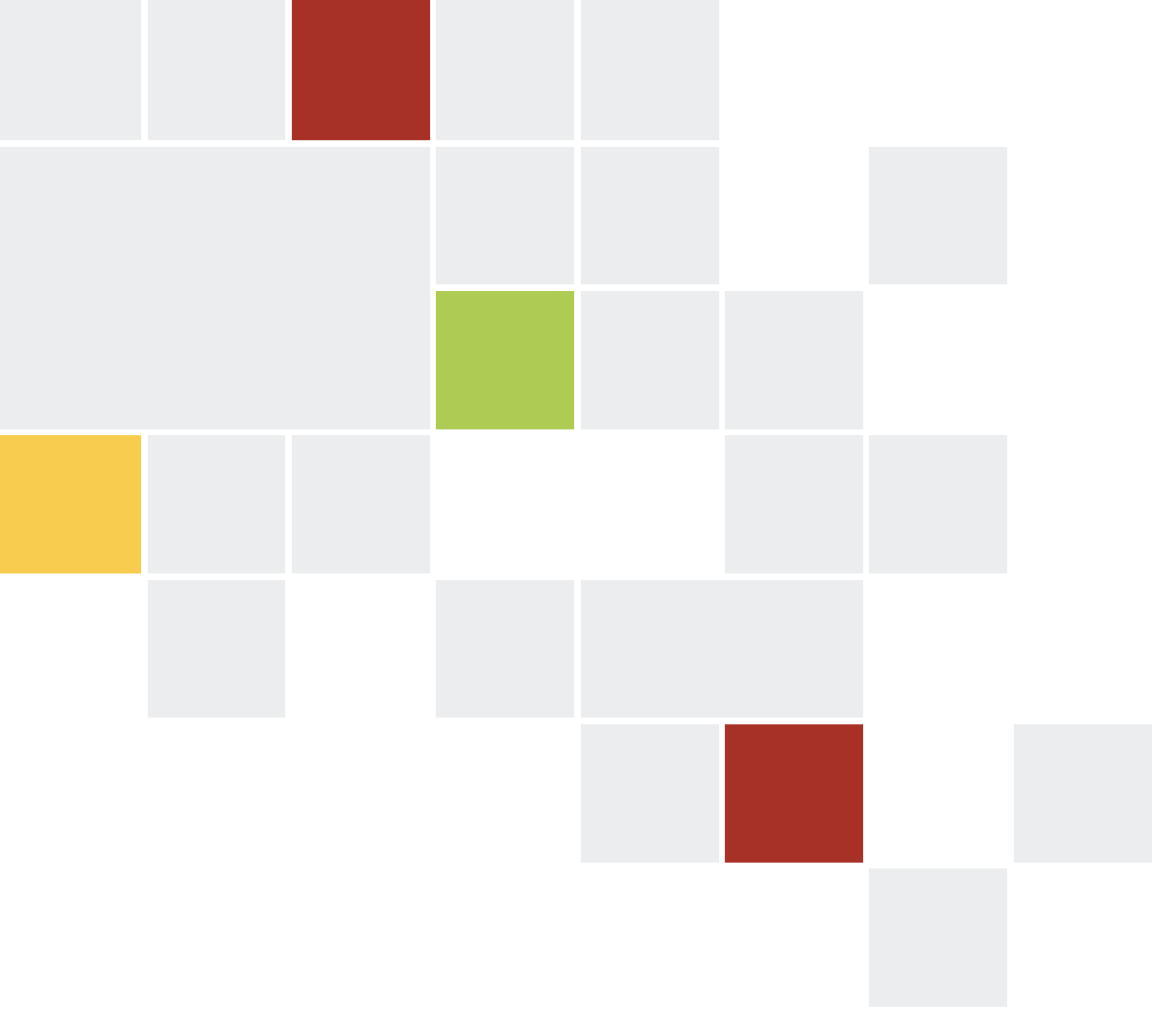
- 4.4 The SEA (2020) for the made Wallingford Neighbourhood Plan sets out several site options at paragraph 5.9, which includes sites A to E. Site A comprises two parcels of land, A1 and A2 (Croudace's interest), which reflects the different landownerships of the site.
- 4.5 Sites A1, A2, and D were 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.
- 4.6 Croudace has undertaken 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 been provided to the Neighbourhood Plan Steering Group via our representations in November 2023.
- 4.7 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. However, the Consultation Statement submitted with the WNPR continues to state the original incorrect assumptions, which have been demonstrably disproved by technical assessment, and shows that the WNPR is based on unreliable and incorrect evidence.

- 4.8 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. The Consultation Statement must also be updated to remove reference to the inaccurate assumptions made with respect to the site's *suitability*.
- 4.9 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 and rebutted per the various technical assessments that Croudace has submitted previously as part of their representations to the WNPR Survey (November 2023).

5. CONCLUSION

- 5.1 Several flaws, omissions, and conflicts presented within the WNPR, as currently proposed, have been set out in our representations, which individually and together mean that the plan fails to meet the basic conditions.
- 5.2 In summary, these concerns relate to;
- the lack of any robust assessment of local housing needs, particularly older persons accommodation and affordable housing needs, and the lack of a new housing allocation that seeks to meet those needs, which makes the WNPR inconsistent with the SOLP and therefore cannot meet the basic conditions.
 - 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.
 - the plan is currently set to constrain the sustainable growth of Wallingford, via the introduction of Policy Criteria WS3.2, which constrains opportunities for Windfall development that is relied upon as part of the adopted Spatial Strategy and in doing so fails to meet the basic conditions.
 - retaining Policy WS2: The Land Allocation for Wallingford is unjustified and unnecessary. The policy should be deleted to avoid confusion for decision-makers and to reflect the planning status of the site.
 - 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 adjacent to the defined settlement boundary.
- 5.3 On this basis, our firm view is that the WNPR does not, as currently proposed, meet the basic conditions for several reasons and cannot therefore proceed to a referendum and adoption in its current state.
- 5.4 It is our view that the inclusion of Policy Criteria WS3.2 specifically would constitute a material change that changes the nature of the plan. The introduction of this policy significantly changes the Plan's relationship with a substantial proportion of the Neighbourhood Area, moving the plan toward a constrained approach to development adjacent to the settlement edge.
- 5.5 National guidance is clear that material modifications which change the nature of the plan (such as the introduction of Policy WS3.2) would require both examination and a referendum. On this basis, the WNPR must progress through to an examination, and then a referendum prior to being made, per national guidance.

- 5.6 Given the complexity of the issues raised with respect to compliance with the basic conditions, specifically in relation to the WNPR's non-compliance with the South Oxfordshire Local Plan Policy H3, we request that an examination is held and that a hearing procedure is undertaken to rehearse discussion on this matter.



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Boyer

Response 14: ID BHLF-DDCF-ZVNW-6

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 17:21:15

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Senior Planning Policy Officer (Neighbourhood)

Organisation (if relevant):

South Oxfordshire District Council

Organisation representing (if relevant):

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OX4 3JE

Telephone number:

01235 422600

Email:

██████████@southandvale.gov.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Please find comments attached.

You can upload supporting evidence here:

01072024 Reg 16 Wallingford Review.pdf was uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

████████████████████

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Not Answered

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Policy and Programmes

HEAD OF SERVICE: TIM ORUYE



Listening Learning Leading

Contact officer: [REDACTED]

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24 July 2024

Wallingford Review Neighbourhood Development Plan – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)

South Oxfordshire District Council has worked to support Wallingford Town Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful, comprehensive and well produced plan review.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Wallingford Review Neighbourhood Development Plan (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed the concerns previously raised.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that are considered to require further consideration. To communicate these in a simple and positive manner; we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view on whether the draft plan meets the basic conditions.

[REDACTED]
Senior Planning Policy Officer (Neighbourhood)

Please note the **bold text** shows our recommended changes to the text.

Ref.	Section/Policy	Comment/Recommendation
	All policies	Box
1	Page 5, paragraph 1.5.2	<p>Within this paragraph we recommend reference is made to the SEA Screening Statement which supports the Wallingford Neighbourhood Plan Review. The following text could be inserted:</p> <p><i>'Following consultation with the statutory bodies, South Oxfordshire District Council determined that the Wallingford NDP Review does not require a Strategic Environmental Assessment. The Screening Statement published on 8 May 2024 forms part of the evidence base supporting the plan.'</i></p>
2	Page 5, paragraph 1.5.3	<p>This paragraph is referring to the screening opinion supporting the made Wallingford NDP. As the screening exercise has been completed again for the NDP Review we recommend that this is referred to. We suggest the following text is amended:</p> <p>'South Oxfordshire District Council consulted with Natural England, and in November 2019 May 2024 gave notice in a Screening Opinion that a Habitat Regulations Assessment was not required for the Wallingford Neighbourhood Plan.'</p>
3	Page 33, paragraph 3.1.4	<p>The second sentence makes reference to the 'South Oxfordshire Design Guide', with a footnote that refers to the South Oxfordshire Local Plan and policies DES1, DES2, and DES3. We recommend that reference is instead made to the Joint Design Guide, which was adopted in June 2022. The footnote can also be updated to link to the Joint Design Guide. We suggest the following text is amended:</p> <p>'The Joint South Oxfordshire Design Guide...'</p>
4	Page 35, Policy HD3: Avoidance of Light Pollution	<p>HD3.2 – Given that Wallingford is in close proximity to two National Landscapes, we recommend reference is made to them within this part of the policy, we suggest:</p> <p>'Development should be designed to minimise the detrimental impact of glare and light spill on sensitive locations including National Landscapes, housing, local amenity, wildlife, highway and waterway users.'</p>

Ref.	Section/Policy	Comment/Recommendation
5	Page 39, paragraph 4.2.5	<p>Our Heritage Officer has raised that good conservation practice does not now actively encourage the use of salvaged materials (except from the same building) because salvage has encouraged the sale of historic material from buildings usually of unknown provenance. As such, we would generally encourage good quality material produced in the traditional manner and which are a good match for the building. Therefore, we recommend that 'salvaged' is replaced with 'good quality'.</p>
6	Page 52, Policy HA3: Views and Vistas	<p>This policy directly refers to different types of views identified by the Wallingford Conservation Area Appraisal. It is accompanied by Map 5. In the made Wallingford Neighbourhood Plan the views and vista map was simply lifted out of the Conservation Area Appraisal and inserted into the Neighbourhood Plan, however the review has inserted a 'Historic panoramic view from the motte towards the Berkshire Downs'. This is not a view identified by the Conservation Area Appraisal, as explained by the supporting text in paragraph 4.10.8 of the Plan.</p> <p>The new view identified is extensive, sweeping over a large area of the town. The views identified by the Conservation Area Appraisal are mostly concentrated within the Conservation Area, whereas the added view extends far beyond the Conservation Area. Currently the policy wording is aligned with the NPPF, in conserving and enhancing the historic environment. On the basis that this view goes much beyond the physical boundary of the Conservation Area we recommend this view is dealt with separately. The following point could be inserted into the policy:</p> <p>'HA3.2 Development proposals should have appropriate regard to the historic panoramic view from the motte towards the Berkshire Downs identified on Map 5.'</p>
7	Page 62, Policy EV1: Green Spaces and Green Corridors	<p>Ev1.1(d) – The modifications to this part of the policy, whilst welcome, make it appear as if there is a link between the National Landscapes and water quality. For this reason, we suggest this point of the policy is restructured with bullet</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>points to show the different elements which the policy is trying to address. We recommend:</p> <p>'respect and protect the setting of the Chilterns and North Wessex Downs National Landscapes, the River Thames and its floodplain to enhance the:</p> <ul style="list-style-type: none"> • water quality for human health; • ecological and natural capital value of the river, its banks, the Thames Path National Trail; and • use of the river for formal and information recreation and promote tourism.
8	Page 63, paragraph 5.3.2	This paragraph appears to relate to policy ENV3 of the South Oxfordshire Local Plan rather than ENV1. We suggest ' ENV3 ' replaces ENV1.
9	Page 77, paragraph 6.3.3	<p>This paragraph states that the employment allocation of 1.09 ha identified by policy EMP7 in the South Oxfordshire Local Plan has generally been satisfied by the development of the Lidl site. This statement is incorrect, with the 1.09 ha relating to different areas at the Hithercroft Industrial Estate, as shown on the Wallingford map in Appendix 3 of the South Oxfordshire Local Plan 2035. The preferred options consultation for the Joint Local Plan 2041 proposed to "save" the allocation, on the basis that the sites have planning permission but have yet to be delivered.</p> <p>We therefore suggest that the second sentence in this paragraph is deleted to remove the reference to the requirement being generally satisfied.</p>
10	Page 77, Map 9	<p>The council, working with the Vale of White Horse, recently jointly commissioned a Town Centres and Retail Study (December 2023). This document forms part of the evidence for the emerging Joint Local Plan preferred options, which recently was consulted on as part of a Regulation 18 Part 2 consultation. We recommend the Wallingford NDP Review uses this evidence to inform the Primary Shopping Area and Town Centre boundary identified in the plan. The updated Study proposes an amendment to the town centre boundary to remove non-main town centre uses, and the Primary Shopping Area boundary remains as</p>

Ref.	Section/Policy	Comment/Recommendation
		<p>existing in the South Oxfordshire Local Plan 2035.</p> <p>We would be happy to provide a replacement map of these areas.</p>
11	Page 104 – Policy MC4: Safe Active Travel	<p>MC4.1 (f) – The second half of this bullet point refers to the Government Framework documents ‘Active Travel England’ and ‘Inclusive Transport Strategy’. However, the purpose of these documents does not align with the policy requirements. 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 ‘Inclusive Transport Strategy’ sets out the Government’s plans to make the transport system more inclusive.</p> <p>On this basis we recommend is that MC4.1(f) remains unchanged from the made WNP:</p> <p>‘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 2020⁵⁴, and ‘Inclusive Transport Strategy’ DfT November 2020 demonstrates the use the ‘Streets for All’ guidance from Historic England to enable all highway users to be safely accommodated particularly within the constraints of the historic town centre;’</p>
12	Page 114, paragraph 9.2.15	<p>Local Green Space designations will continue to be designated when included in the neighbourhood plan. We suggest the narrative is amended slightly to reflect the situation:</p> <p>‘The Wallingford Neighbourhood Plan 2021 Policy CF3 to designated three Local Green Spaces at Radnor Road, Wilding Road and The Paddock has been satisfied. They continue to be designated in this plan.’</p>

Response 15: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-24 20:26

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agency

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Director

Organisation (if relevant):

Turley

Organisation representing (if relevant):

David Wilson Homes

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post code:

Telephone number:

0118 902 2830

Email:

[REDACTED]@turley.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

To whom it may concern

Please find attached representations on behalf of David Wilson Homes to the Wallingford Neighbourhood Plan which is currently the subject of public consultation.

We would be grateful for confirmation that these representations have been received and registered as being duly made.

Kind regards

[REDACTED]

Principal Planner

Mobile:

[REDACTED]

Office: 0118 902 2830

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

24th July 2024

By email (planning.policy@southandvale.gov.uk)

South Oxfordshire District Council
Abbey House
Abbey Close
Abingdon
OX14 3JE

Dear Sir/Madam

**REPRESENTATIONS TO THE REVIEW OF THE WALLINGFORD NEIGHBOURHOOD PLAN
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 document. We note that representations were submitted on behalf of DWH to the Regulation 14 earlier this year.

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 draft Neighbourhood Pla consultation, highlighting issues to be addressed, and inconsistencies with National and Local Planning Policy, including emerging proposals of South Oxfordshire District Council.

REPRESENTATIONS

Modifications Statement

We begin by noting the conclusions of the Modifications Statement which has been published s part of the consultation. That Statement concludes that

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“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 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.”

Review of the Neighbourhood Plan and its 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. Having regard to the conclusions of the Modifications Statement, the changes can be said to be:

- General factual updates (such as updated references to reflect new legislation);
- The allocation of the medical centre on Site E (Policy WS2.3); and
- Defining the Built-Up Area Boundary (Policy WS3).

Taking each of those in turn:

- There is no need to review a Neighbourhood Plan for general factual updates, even where it would reflect new legislation;
- Policy WS2 (through point WS2.2) of the RWNP explains that *“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”*. We address this policy elsewhere, but note that there is no indication as to what land is being allocated. Furthermore, we understand that the County Council has indicated that land within Site E originally identified a school is no longer required for that purpose (and that it is this area which is to be used for the medical centre). We have not had sight of any material which demonstrates the school is no longer required. Even if that statement within the RWNP is correct, it is worth noting there is no *specific* allocation of land within Site E for a school. Planning permission P16/S4275/O did allow for a school, but the equivalent policy in the existing WNP makes no reference to it (and nor is there any such policy in the Local Plan 2035). **Fundamentally, there is no reason why the allocation of land (if indeed there is a specific allocation) to provide for a medical centre is necessary.** Should such a scheme be proposed, we expect that such an application would be seen to be in accordance with the Development Plan as a whole
- DWH do not consider that it is necessary to define a Built-Up Area boundary. There is no such policy basis for these boundaries in the adopted Local Plan 2035, nor is there any explanation as to why it is necessary for such a boundary to be defined through the RWNP.

Overall, it is our view that the primary changes to the Neighbourhood Plan are tenuous at best and, in our submission are proposed for the sake of it.

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 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.

Policy WS2: The Land Allocation For Housing In Wallingford

This policy relates to the land known as 'Site E' to the west of Reading Road, south of Bradford's Brook and north of the Wallingford bypass (A4130).

Parts WS 2.2 and 2.3 are new and state:

"WS 2.2 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:

- Set out the rationale for the size and design of the proposed medical centre demonstrating how long term needs have been considered
- Provide adequate vehicle and cycle parking for staff and patients
- Ensure that access to the site encourages both walking and cycling
- Demonstrate the viability of the medical centre and the scale of housing proposed.

WS2.3 The care facility on Site E should be designed to take account of identified needs in Wallingford for housing for the elderly and disabled in terms of type and size of facility”

Elsewhere in these representations, we explain that the new test at WS 2.2 is unnecessary. Firstly, we note that there is no indication as to what land is being allocated. Furthermore, we understand that the County Council has indicated that land within Site E originally identified a school is no longer required for that purpose (and that it is this area which is to be used for the medical centre). We have not had sight of any material which demonstrates the school is no longer required. Even if that statement within the RWNP is correct, it is worth noting there is no *specific* allocation of land within Site E for a school as things stand. Planning permission P16/S4275/O did allow for a school, but the equivalent policy in the existing WNP makes no reference to it (and nor is there any such policy in the Local Plan 2035). **Fundamentally, there is no reason why the allocation of land (if indeed there is a specific allocation) to provide for a medical centre is necessary.** Should such a scheme be proposed, we expect that such an application would be seen to be in accordance with the Development Plan as a whole. **We consider that this addition is unnecessary.**

In relation to WS 2.3, again we consider that this is unnecessary as it is a matter that can be addressed through normal development management processes. In fact, it is particularly unnecessary as planning permission P16/S4275/O included the extra care facility as part of the overall housing provision. The overall nature of the scheme is therefore established, and we see no need to now embed, well after the planning permission has been granted, a policy such as WS 2.3. **We consider that this addition is unnecessary.**

The Built-Up Area Boundary

The RWNP seeks to introduce a Built-Up Area boundary. There is no such policy basis for these boundaries in the adopted Local Plan 2035, nor is there any explanation as to why it is necessary for such a boundary to be defined through the RWNP. **We consider that this addition is unnecessary.**

However, even if this change is progressed, we do not consider that it is a material change as all it does is to define the extent of existing and planned growth, .

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 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, up-to-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 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.

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 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.

Is an Examination / Referendum Required

The Modifications Statement explains that:

“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.”

The PPG states that *“Where material modifications do not change the nature of the plan (and the examiner finds that the proposal meets the basic conditions, or would with further modifications) a referendum is not required.”* (Paragraph: 085a Reference ID: 41-085a-20180222).

DWH concur that a referendum is not required in this instance.

Notwithstanding the above, we note that none of the modifications are necessary at all.

SUMMARY

Should an examination be required, DWH would like the opportunity to participate in that process, in order to ensure that these matters can be fully discussed with the Examiner. As we explain above, the modifications to this Neighbourhood Plan are tenuous at best, but also unnecessary and seemingly made for the sake of it. We strongly urge the review of the Neighbourhood Plan to pause, pending clarity on the outcome of the Joint Local Plan.

Yours faithfully

██████████

Director

██████████@turley.co.uk

Response 16: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 10:56

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Agency

2 Please provide your contact details below.

Title:

Name:

[REDACTED]

Job title (if relevant):

Consultant

Organisation (if relevant):

Walsingham Planning

Organisation representing (if relevant):

Nicholas King Homes

Address line 1:

Bourne House

Address line 2:

Cores End Road

Address line 3:

Bourne End

Postal town:

Post Code:

SL8 5AR

Telephone number:

[REDACTED]

Email:

[REDACTED]@walsingplan.co.uk

Part B - Your comments

3 Please provide your comments below.

Your Comments:

Dear Sir/Madam,

Wallingford Neighbourhood Plan Review Consultation
Submission of representations on behalf of Nicholas King Homes

On behalf of my client, Nicholas King Homes, please find attached our response to the current consultation on the Wallingford Neighbourhood Plan Review Consultation.

Please contact me with any queries.

Thanks

[REDACTED]

[REDACTED]

Consultant

Walsingham Planning
Bourne House, Cores End Road, Bourne End, Bucks SL8 5AR

M: 07391 416534
www.walsinghamplanning.co.uk

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Our Ref: AD/B003324

25 July 2024

Planning Policy
South Oxfordshire District Council
Abbey House
Abbey Close
Abingdon
OX14 3JE

Submitted by email

Dear Sir/Madam

Draft Wallingford Neighbourhood Plan Review – June/July 2024 Consultation

Representations on behalf of Nicholas King Homes

Land at Purely Plants Nursery, Wantage Road, Wallingford OX10 0LU

Introduction

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 and 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. Representations were made in February 2024 towards the latest South and Vale Local Plan consultation. Finally, representations were made in April 2024 towards Wallingford Town Council's Neighbourhood Plan Review.

The site has been the subject of two recent planning applications:

- I. **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.

Previous Representations to the Wallingford Neighbourhood Plan Review

Appended to this letter are the previous representations made on behalf of Nicholas King Homes dated 04 April 2024. It is unfortunately necessary for these current representations to re-emphasise the same observations and objections previously made.

Paragraph 3.4 of the Consultation Statement confirms that Nicholas King Homes was a consultee that responded, and paragraph 3.5 states that having considered the responses that “*the Plan was altered where appropriate*”. The Plan has not been altered to reflect our representations. Indeed, the previous representations made by Nicholas King Homes have not been considered. No Statement of Community Involvement has been published that directly reference how comments have been fully considered.

For the reasons previously given in the April 2024 letter, the process is **unsound** and the proposed changes to the WNP are **not justified**. There are fundamental flaws in the plan-making process which have not been addressed.

Scope of Representations

The focus of these representations is the following sections of the Plan Review document

- P.15 Map 2
- P.25 Map 3
- P.26 Policy WS3
- P.26 paras 2.7.1 – 2.7.5
- P.159 Appendix H Built Up Area Boundary Justification
- P.160 Appendix H Map I

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 submission version consultation document has been updated to include Appendix H “Built Up Area Boundary Justification”. In terms of policy content, the document attempts to respond to the previous representations made by Nicholas King Homes through the insertion of Appendix H, and makes reference to the reasons for refusal for the above applications as the site.

Our concerns have not been addressed, and fundamental flaws in the plan-making process and content of the draft policy remains. In order to make the plan sound, for the changes to be justified, and in order for the Plan to be consistent with the government’s forthcoming changes to the NPPF and housebuilding ambitions, the built-up area boundary needs to be removed. It is not justified, and is premature in advance of the new Local Plan.

It is not appropriate for the Neighbourhood Plan review to proceed in advance of the Local Plan review, particularly given the level of objection to the Local Plan Reg 18 consultation, and the Government’s forthcoming changes to the NPPF which will include mandatory housing targets for local planning authorities to meet.



Comments

As mentioned above, these representations are similar in their scope and content to those submitted to Wallingford Town Council in April 2024.

It is necessary for these current representations to re-emphasise the same observations and objections previously made for completeness, because their content has not been taken on board or actioned. There continues to be a lack of transparency and engagement towards my client, despite the proposed changes having significant implications that directly impact my client's land interest in Wallingford.

The Process

The approach the Town Council have taken is a deliberate and conscious decision to draw the built-up area boundary to exclude the site, with the desired outcome directing the process rather than the evidence and process informing the outcome.

Previously the presentation of the built-up area boundary was done without any justification, however, the current consultation document includes Appendix H. Putting aside the content of this chapter (which is discussed below), this is a fundamentally flawed approach to plan-making. A final position was chosen some time ago ("the built up area boundary must be drawn *here*") and the 'evidence' has been provided at a later date. This is simply not how policies should be prepared.

Furthermore, neither my client nor the landowner have been invited to be involved with the policy drafting which directly impacts the site. This was raised in our April 2024 response and has not been addressed. The only opportunity to engage with the process – which has significant implications for the landowner and my client – is the April 2024 consultation and this current July 2024 consultation. 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.

The above points collectively mean that the Review Plan has not been **positively prepared**, nor is it **justified**.

The previous consultation included a Modifications Statement which concluded 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.*"

We do not agree with this statement. 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 the application of policy on land outside of the defined boundary and therefore directly impacts landowners and site promoters. 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 HI 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. The introduction of a settlement boundary – and the policy restriction this would introduce at the Neighbourhood Plan level – would not be consistent with the adopted Local Plan.

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.

All of this is against the context of South Oxfordshire District Council being unable to demonstrate a five-year housing land supply: a severe shortfall of 3.49 years has been established by Inspectors at recent planning inquiries across the district. This is also in the context of housing targets being a minimum, not a cap. Higher order sustainable settlements such as Wallingford are well placed to accommodate additional housing and infrastructure to meet the District’s needs in the future. Further, the Government has made it clear that forthcoming changes to the NPPF will reintroduce mandatory housing targets which local authorities must meet. The proposed changes to the Neighbourhood Plan including the introduction of a built-up area boundary are completely at odds with both the existing NPPF and the forthcoming changes to the NPPF and the Government’s housebuilding ambitions. It can only therefore be concluded that the Review Plan is **not consistent with national policy**.

Draft Policy

We have previously raised concerns at the lack of evidence or justification to support the boundary being drawn as presented. Appendix H now provides some explanation, however our concerns still remain as set out below. Furthermore, the drawing of the boundary to exclude the nursery site does not meet the Review Plan’s own tests contained at WS3 and Appendix H.

The supporting text inserted into 2.7.1-2.7.4 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 2.7.1-2.7.4 have not been adhered to which represents an **unsound** approach to plan-making.

It is not logical to exclude the site. It is demonstrably 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 2.7.4, 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 2.7.5 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 inappropriate.*
- *land within the curtilage of houses which adjoin the rural area where back-land development would be inappropriate.*

Clearly, the examples listed at 2.7.4 & 2.7.5 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.

Appendix H

Turning to Appendix H, it is once again important to reiterate the point that the desired outcome has directed the process rather than the evidence and process informing the outcome. Early in the process a decision was made and a boundary was drawn, and at every stage since there has been backfilling of the gaps in the Plan and new justification inserted into the Review Plan.

Appendix H has now appeared in this late-stage submission version of the consultation and this is the first time it has been made publicly available with the opportunity to comment on it. This is an **unsound** approach to plan-making and policy formulation and demonstrates that the Neighbourhood Plan Review has not been **positively prepared**.

With regards to the content, the evidence and justification is inaccurate or incorrect, or not justified. Paragraph H9 is factually incorrect and misrepresents the nursery site. The site comprises a commercial plant nursery with outbuildings and storage areas which is contiguous with Wallingford. The use of a site as a nursery constitutes previously developed land and not agricultural use.

Appendix H cites two decisions (both very similar applications, the latter a 'free go' application) and their reasons for refusal as justification for drawing the boundary where it is shown. This is a Planning Officer's opinion and one we strongly disagree with, and one which has not been tested at appeal by



an independent third-party Inspector. Furthermore, and perhaps most importantly, in plan-making the evidencing of decisions should be made against the site and an appropriate assessment of its characteristics, rather than the specifics of a planning application. To justify the formulation of new policy on this basis is an extremely **unsound** approach.

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, the built-up area boundary needs to be removed. It is not consistent with forthcoming changes to the NPPF including the reintroduction of mandatory housing targets.

Whilst the Neighbourhood Plan supports new housing for the town, the proposed introduction of a built up area boundary severely restricts this, resulting in a conflict with its own policies and ambitions and that of the NPPF. Furthermore, the draft Neighbourhood Plan contains only a single site allocation, Site E Winterbrook Meadows. This is covered by Policy WS2 and Appendix A. This site is under construction and should not be included as an allocation as it no longer meets this definition. The result is that the Neighbourhood Plan doesn't contain any housing allocations, and therefore doesn't meet the criteria of Paragraph 14(b) of the NPPF.

Emerging South Oxfordshire & Vale of White Horse Local Plan; Consultation on New National Planning Policy Framework

As highlighted above, the Neighbourhood Plan review process is premature in the context of both the emerging South Oxfordshire & Vale of White Horse Local Plan, and the forthcoming consultation on changes to the National Planning Policy Framework which will commence by the end of July. The latter will have wide-ranging implications for housing delivery, including mandatory housing targets, and seeking to impose a built up area boundary specifically for the purpose of restricting new residential development is entirely contrary to this. Given the imminent publication of the consultation NPPF and the expectation it will be adopted within months, the content of this should be reviewed and assessed in the context of the Neighbourhood Plan Review before it is progressed further.



Conclusion

The Modifications Statement is incorrect to conclude that the changes proposed do not change the nature of the Wallingford Neighbourhood Development Plan. The drawing of a defined settlement boundary and seeking to restrict development outside of this tightly drawn limit will have implications for the spatial strategy and distribution of growth across Wallingford, and indeed South Oxfordshire more widely, and will severely restrict development of otherwise suitable sites that should be assessed on a case by case basis.

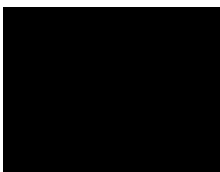
South Oxfordshire District Council cannot demonstrate a five-year housing land supply. Going forward, it will be essential that higher order sustainable settlements such as Wallingford accommodate additional housing and infrastructure to meet the District's needs. It is also important to note that housing targets are a minimum, not a cap and that mandatory housing targets are due to be reintroduced imminently through a revised NPPF.

It is clear that the Town Council do not want the Purely Plants Nursery site to be developed for housing and have drawn the built-up area boundary through the built up limits of Wallingford to specifically and intentionally exclude the nursery site, and to seek to classify it as unspoilt open countryside. Following this internal decision, the Town Council have proceeded to exclude my client from the plan-making process entirely. As a key stakeholder on a site that is significantly impacted by the proposed changes to the plan this is unfair and does not demonstrate effective engagement through the plan-making process.

Subsequent iterations of consultation documents have filled in the gaps, rather than use an evidence-based approach to inform decisions and policies which emerge in the usual matter. This has resulted in latterly trying to provide evidence to support the preferred boundary, rather than arriving at a boundary that is informed by evidence.

All of the above points considered, the proposed changes are **not justified**; the Plan has **not been positively prepared**; and, the approach to the built-up area boundary is **not consistent with national policy**. The Plan Review therefore fails to meet the tests of soundness outlined in the NPPF.

Yours faithfully



[Redacted]

Director

[Redacted]@walsingplan.co.uk

[Redacted]



Response 17: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 15:36

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Senior Primary Care Estate Manager

Organisation (if relevant):

Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post Code:

Telephone number:

074714 98565

Email:

██████████@nhs.net

Part B - Your comments

3 Please provide your comments below.

Dear Sir or Madam,

Please see the attached representation from the ICB.

Best regards,

██████████
Senior Primary Care Estate Manager

Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

M: ██████████ | E: ██████████ | Web: bucksoxonberksw.icb.nhs.uk

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:



Planning Policy Team
South Oxfordshire District Council
planning.policy@southandvale.gov.uk

Unipart House
Oxford
OX4 2PG

25 July 2024

Dear Planning Policy Team,

Wallingford Neighbourhood Plan Submission Version dated May 2024 Consultation

Thanks for giving us an opportunity to make our representation at the Wallingford Neighbourhood Plan Submission Version dated May 2024 Consultation.

Introduction

Integrated Care Board is a statutory NHS organisation, which was established on 1 July 2022 by The Integrated Care Boards (Establishment) Order 2022 and has the delegated function of commissioning of primary care services. ICBs now carry on all CCGs functions including the commissioning of primary care services including GPs. NHS Buckinghamshire, Oxfordshire & West Berkshire Integrated Care Board (ICB) formally replaced the former Oxfordshire Clinical Commissioning Group (CCG) on 1 July 2022 and carries on all CCG functions as far as they relate to primary care and its estates. The ICB however has no dedicated funding for any primary care estates development in their annual budgets.

Primary healthcare estates including GP premises are funded through reimbursement of rents and business rates by the ICB. The rent will then be assessed by the District Valuer, given that the ICB will reimburse that rent. As a primary care commissioner, the ICB therefore has a responsibility to ensure that any primary care provision is financially affordable and operationally viable.

Policy WS2: The Land Allocation for Housing in Wallingford

The former Oxfordshire Clinical Commissioning Group (OCCG), which is now replaced by the ICB, has formally discussed and conditionally approved support for this primary care site allocation in 2021. The former OCCG has clearly set out that this support will be dependent on the affordability of the commissioner and the production of a compelling business case for a new development. The costs involved in securing a site are also not payable by the commissioner.

The Wallingford Medical Practice produced a Project Initiation Document (PID) for the development of a new medical centre in 2023 but it was not formally approved. No further PID has been received by the ICB by the time of writing this representation.

The ICB can only fully support this allocation only if the new onsite facility is operationally and financially viable and importantly is affordable to the ICB. The rental valuation of any new build should need to be approved internally by the ICB, as there is a need to take into account whether the new rent is affordable to the NHS. The rental value will then need to be considered and agreed by the District Valuer. In an absence of an approved business case, the ICB is not able to formally review the affordability of this allocation.

The ICB is happy to continue to work with the Wallingford Medical Practice if the Practice has any difficulties in the production of a PID or an outline business case for consideration.

The ICB also welcomes to continue to work with the Wallingford Town Council and other local stakeholders to ensure that an appropriate mitigation is identified to ensure that adequate GP services are provided to residents in Wallingford. The ICB therefore suggests the following to be added to the main text of paragraph WS2.2:

*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. **Developers are encouraged to engage with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or other such appropriate body prior to any formal submission of planning applications to discuss the following:***

- ***the GP provider of the new facility has managed to secure a formal consent from the BOB-ICB, as a primary care commissioner, and***
- ***the details of the delivery and contractual arrangement of the facility***

Any proposals for the site should:

- ***Be operationally and financially viable, the details of which should be agreed with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or other such appropriate body***
- ***Comply with the Department of Health Building Note 11-01 (or any successor documents), including all rooms***
- *Set out the rationale for the size and design of the proposed medical centre demonstrating how long term needs have been considered*
- *Provide adequate vehicle and cycle parking for staff and patients*
- *Ensure that access to the site encourages both walking and cycling*
- *Demonstrate the viability of the medical centre and the scale of housing proposed.*

Policy CF5: Health & Wellbeing Service Provision

The ICB supports a policy related to health service provision. As discussed above, the ICB needs to ensure that any new primary healthcare provision, including any new provision is affordable and operationally viable. The ICB should be involved at an early stage in any pre-planning discussion with developers, Wallingford Town Council, South Oxfordshire District Council, GP provider(s) and local stakeholders, given our delegated function of the commissioning of primary healthcare services.

The ICB suggests the following to be added to the main text to Policy CF5 to briefly set out that any primary healthcare provision should be financially and operationally viable. Being a primary healthcare commissioner, the ICB should be engaged with any new primary healthcare provision:

Proposals comprise any primary healthcare provision including expanding or reconfiguring the existing premises to provide additional clinical capacity will only be supported if it is operationally and financially viable, the details of which should be agreed with NHS Buckinghamshire, Oxfordshire, and Berkshire Integrated Care Board (BOB-ICB) or other such appropriate body. Any new primary healthcare facility room sizes should comply with the Department of Health Building Note 11-01 (or any successor documents). Developers are encouraged to engage with BOB-ICB at an early stage to discuss the details of the delivery and contractual arrangement of the facility. The delivery of the facility shall be funded by developer contribution and/or the Community Infrastructure Levy and the provision, and any contractual arrangement of the facility shall be agreed and secured by a Section 106 agreement in any forthcoming planning applications.

Summary and Conclusion

Thank you again for giving us an opportunity to make our representation at the Consultation. Please do not hesitate to contact me if you have any questions related to the representation.

Yours sincerely

██████████

Senior Primary Care Estate Manager

Response 18: ID ANON-DDCF-ZVNT-3

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 15:41:03

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Clr

Name:

James

Job title (if relevant):

District Councillor

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

1 Aston Close

Address line 2:

Address line 3:

Postal town:

Wallingford

Post code:

OX109AY

Telephone number:

[REDACTED]

Email:

[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Your Comments:

To the WNP team: Thank you for your work on this. There is so much to be positive about – such as policies MC3, MC6 and TC3.1.1.

Thank you for taking into account some of my prior comments made at earlier consultation stages of this review in December 2023 and April 2024. Below I re-emphasise some other earlier comments that I feel need significantly strengthening still or actual incorporation:

Policy WS1.1(i)

Please include adequate secure cycle parking. And then similarly mention in 2.4.9.4 to be consistent.

Policy WS2.2

We (District Cllr Keats-Rohan & I) strongly suggest modifying policy WS2.2 so that it includes provision of appropriate informal recreational leisure space in line with the Wallingford needs identified in the emerging SODC Leisure Facilities Strategy (such as a skate park or park for wheeled sports). In addition "Make Space for Girls" (<https://www.makespaceforgirls.co.uk/>) should be considered in determining provision that is appealing and inclusive for girls, including swings, hang out zones, places to sit down and be together. Please ensure that points 2.6.2 and 2.6.6 are appropriately worded to acknowledge our proposed changes to WS2.2.

In addition, it would be good to have 2.6.7 include an option for this site to include / be used for appropriate informal space in line with these same Wallingford needs identified in the emerging SODC Leisure Facilities Strategy and our proposed changes to WS2.2.

Policy WS3.1(d)

Please add in words that acknowledge development proposals must not make vulnerability to extreme heat (by creating urban heat islands) more likely. In line with "A Summary of the Current and Future Climate Vulnerability of Oxfordshire" commissioned by Oxfordshire County Council in coordination with City and District Councils and other Oxfordshire stakeholders. See p30 of that report to see that Wallingford already is categorised as having high heatwave risk (third highest in S.Oxon) – and when this is combined with an ageing population and the number of care homes etc....

Policy HD2.1

Please include reference to 'zero embodied carbon' in line with the emerging SODC JLP's policy CE3.

WS4 HOUSING

WNP02: I'm glad to see that the wording names social housing – something which Wallingford is drastically short of. I would like this explicitly named in policy WS4 which could thus be titled 'social and affordable housing, and housing mix'. Alternatively, please explicitly make clear that affordable is a catch-all term for both social and affordable housing. Similarly WS4.2(d) & (e) need to include 'social housing' as well as affordable.

TC2

Please could we modify this to include provision for a much-needed community hall / space as identified in the emerging SODC Leisure Strategy. This needs to be in addition to TC3 given the latter's caveats.

Please include a TC policy on secure cycle parking – part of an active travel based, sustainable town. This would be consistent with the welcome MC3.1.

MC1.2 Please add in 'users of wheelchair / invalid carriages' so their needs are explicitly named too. Groups such as MIGWAL have identified that Wallingford is a nightmare for them currently, with accessibility severely wanting in many places - let's not make it worse.

9.2

In addition please can we be explicit about "Making Space for Girls" (<https://www.makespaceforgirls.co.uk/>) which should be considered in determining provision that is appealing and inclusive for girls, including swings, hang out zones, places to sit down and be together.

9.2.19 (in line with CF1.2)

Please add in something to the effect "that provision should be made for a much-needed community hall / space, as identified in the emerging SODC Leisure Strategy. (This needs to be in addition to TC3 given the latter's caveats, and is consistent with CF1.1.)

9.2.25

Please add in something like "Alternatively the site could provide informal leisure spaces space such as those Wallingford needs, as identified in the emerging SODC Leisure Strategy and those that explicitly "Make Space for Girls" (<https://www.makespaceforgirls.co.uk/>).

CF1.2.3 – include informal leisure spaces space such as those Wallingford needs identified in the emerging SODC Leisure Strategy and those that explicitly "Make Space for Girls" (<https://www.makespaceforgirls.co.uk/>). This is to ensure there is a wider diversity of options for Wallingford's youth – this vital provision can not simply be left to the Community Aspirations chapter. Perhaps consider linking this to our suggested revision to WS2.2, and / or adding a fourth point, which could be worded along the following lines:

CF1.2.4 On appropriate land which will provide informal leisure space such as those Wallingford needs, as identified in the emerging SODC Leisure Strategy and those that explicitly "Make Space for Girls" (<https://www.makespaceforgirls.co.uk/>).

10.1.10

In addition "Make Space for Girls" (<https://www.makespaceforgirls.co.uk/>) should be considered in determining provision that is appealing and inclusive for girls, including swings, hang out zones, places to sit down and be together.

You can upload supporting evidence here:

No file uploaded

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

JB comments on WNP consultation July 2024 (Reg 14)

To the WNP team: Thank you for your work on this. There is so much to be positive about – such as policies MC3, MC6 and TC3.1.1.

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TC2

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9.2.25

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CF1.2.3 – include informal leisure spaces space such as those Wallingford needs identified in the emerging SODC Leisure Strategy and those that explicitly "Make Space for Girls" (<https://www.makespaceforgirls.co.uk/>). This is to ensure there is a wider diversity of options for Wallingford's youth – this vital provision can not simply be left to the Community Aspirations chapter. Perhaps consider linking this to our suggested revision to WS2.2, and / or adding a fourth point, which could be worded along the following lines:

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In addition "Make Space for Girls" (<https://www.makespaceforgirls.co.uk/>) should be considered in determining provision that is appealing and inclusive for girls, including swings, hang out zones, places to sit down and be together.

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?



Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

No, I do not request a public hearing

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.



Other, please specify:

Response 19: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 15:36

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:
[REDACTED]

Job title (if relevant):
[REDACTED]

Organisation (if relevant):
Berkeley Homes (Oxford and Chiltern) Ltd

Organisation representing (if relevant):

Address line 1:
Berkeley House

Address line 2:
Mill Lane

Address line 3:
Taplow

Postal town:
Maidenhead

Post Code:
SL6 0AG

Telephone number:
[REDACTED]

Email:
[REDACTED]

Part B - Your comments

3 Please provide your comments below.

Good afternoon,

Please find the attached in response to the Regulation 16 Consultation on the Wallingford Neighbourhood Plan.

The attached reps are in relation to 'Site E', Winterbrook Meadows.

Many thanks,

[REDACTED]
[REDACTED]

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

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Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

Neighbourhood Plan Steering Group
Wallingford Town Hall
Market Place
Wallingford
OX10 0EG

25th July 2024

Dear Sir/Madam,

Wallingford Neighbourhood Plan Review – Regulation 16 Consultation

As part of the Review Consultation for the Wallingford Neighbourhood Plan and following our previous representations submitted in April 2024, I am writing to set out our thoughts on the draft plan. Our representations relate to the proposals set out in the Neighbourhood Plan in relation to Winterbrook Meadows 'Site E'.

Planning Background

The Outline Consent provided for 502 dwellings, including a 60-bed extra-care facility, together with the 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 commenced, and in accordance with the S106 all requirements for a school on this land fell away.

Following this, in 2022, we were 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 are in urgent need of larger premises due to the growing population within Wallingford coupled with the age and condition of the existing facility.

Since the initial approach in 2022 we have been working closely with the Medical Centre and are aiming to submit a full planning application in Autumn 2024 for the Medical Centre and additional housing, on the former school land.

Draft Neighbourhood Plan Proposals

Former School Land

Policy WS2.2 of the plan allocates the land for a medical centre and recognises that there is the possibility for some housing to come forward, and that these homes should ensure that the specialist needs for older and disabled people locally has been met.

Policy WS2.3 states that any housing that comes forward on the land previously allocated for a school should in the first instance seek to meet needs for specialist housing for older people.

Extra-Care

Policy WS2.3 states that the care facility, at Winterbrook Meadows, should be designed to take account of the identified needs in Wallingford for housing the elderly and disabled in terms of the type and size of facility.

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Paragraph 2.9.2 of the draft plan state that in the short term, the supply of specialist housing is sufficient, however any additional need would best be addressed by expanding on the extra-care at Winterbrook Meadows.

Berkeley Homes Response

We very much support the inclusion of Winterbrook Meadows (Site E) within the draft plan, and look forward to bringing the latter phases forward in accordance with the approved Design Code. Whilst it is positive that the draft Neighbourhood Plan acknowledges additional housing coming forward on the former School Land, we do have some concerns with regards to the proposed tenure of these.

As referred to in our previous comments, whilst Berkeley are working with Wallingford Medical Centre to support the delivery of a new facility, it is essential that additional housing is delivered on the remaining 3.5 acres of this land, in order to ensure it is viable for Berkeley to transfer, at nil cost, 1.5 acres of developable land to the Medical Centre. In addition to the loss of developable land, Berkeley will also deliver key infrastructure to support the Medical Centre, including the access junction and services, incurring significant costs.

As such, we are proposing an additional 60-70 homes on the land, to allow us to continue supporting the delivery of the Medical Centre. Due to the sufficient supply of specialist housing, identified in paragraph 2.9.2 of the draft plan, the delivery of further specialist housing here would create a risk to the generation of funds, due to a potential lack of demand.

It is important that any housing brought forward on this parcel of land is delivered as traditional housing, to ensure we are able to sell the homes and reinvest the monies into key infrastructure for the Medical Centre. Delivery of these homes will help provide much needed housing within a District, currently only demonstrating a 4.2 5YHLS.

SOLP Policy H13 states that encouragement will be given to developments that include the delivery of specialist housing for older people in locations with good access to public transport and local facilities. Policy H13 adds that provision for specialist housing for older people should be made in strategic housing allocations.

The Oxfordshire Strategic Housing Market Assessment (SHMA) (2014) identifies the need for between 280 and 450 additional housing units for older persons between 2011 and 2031 based on demographic projections. In South Oxfordshire this equates to between 66 and 105 units.

In general, the draft plan guides delivery of specialist housing to Winterbrook Meadows. However, within immediate proximity of Winterbrook Meadows, there are a number of purpose-built specialising housing developments, including the Barchester Waterside development on Wallingford Road, Beechcroft's Longcross Place on Reading Road, the Extra-Care development at Highcroft, also delivered by Berkeley Homes. Whilst the draft local plan acknowledges that the long term need for this type of housing is unknown, given the excess of supply in the immediate area at present, it is not considered that this would be an appropriate location to expand on, and that delivery of this type of housing would be best spread out across the district, ensuring local access for all. Whilst the

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evidence demonstrates a need for specialist housing for older people, it could be argued that the need for further specialist housing provision might not be required at Winterbrook.

Therefore, we would suggest that the requirement in Policy WS2.2 that any additional homes are specifically for older people, does not accurately reflect the true housing need within the District, and therefore his restriction on tenure should be removed from the draft plan. In addition, as the draft plan supports, in principle, the delivery of further housing at Site E, over and above the 502 homes which have Outline Consent, we would ask that the wording in Policy WS2.2 changes from “up to 502” to “approximately 502”, allowing us to deliver further homes on the former School Land parcel, without conflicting with the plan.

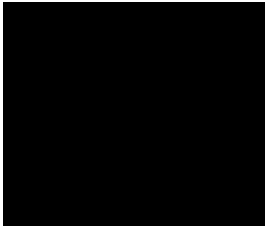
Summary

Berkeley Homes continue to support the delivery of the Medical Centre and look forward to the new facility being delivered at Winterbrook Meadows. However, in order to ensure that we are able to continue supporting its delivery we feel that the Neighbourhood Plan should review the specific policies related to Winterbrook Meadows, to ensure that it does not just promote the delivery of specialist housing, but all housing types.

With the above in mind I hope that you are able to support our comments, in order to secure the delivery of a new Medical Centre in this location.

We look forward to engaging with you further on this.

Kind Regards,



Development Manager

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Response 20: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-25 22:52

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Individual

2 Please provide your contact details below.

Title:

Name:

Katharine Keats-Rohan

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post Code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

Dear Team,

I have worked as part of the steering group on this revision, but would like to take this last minute opportunity to ask for an additional allocation of informal recreational leisure space in line with the Wallingford needs identified in the emerging SODC Leisure Facilities Strategy (such as a skate park or park for wheeled sports) on site E, in policy WS2.2.

regards,

Katharine

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

5 Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan review?

Public hearing

6 Most neighbourhood plans are examined without the need for a public hearing. If you think this neighbourhood plan review requires a public hearing, you can state this below, but the examiner will make the final decision.

Public hearing

7 Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify:

The following response was received after the Regulation 16 consultation had ended.

Response 21: ID N/A

Submitted to Wallingford Neighbourhood Plan Review: Submission Consultation
Submitted on 2024-07-26 03:34

Next steps

Part A - Personal Details

1 Are you completing this form as an:

Organisation

2 Please provide your contact details below.

Title:

Name:

Job title (if relevant):

Organisation (if relevant):

Organisation representing (if relevant):

Girlguiding Wallingford District

Address line 1:

Address line 2:

Address line 3:

Postal town:

Post Code:

Telephone number:

Email:

Part B - Your comments

3 Please provide your comments below.

On behalf of Girlguiding Wallingford District, we request consideration at SODC and Wallingford Town Council levels for support for identification of an appropriate site and funding for a replacement Guide Hall once the lease on our current site at Fir Tree Junior School is ended due to the proposed expansion of the school. We understand and support the need to expand education provision in Wallingford, but feel it is also vital to maintain the provision of Girlguiding as a volunteer-led youth organisation for the community. Our current hall hosts seven youth groups each week during term time, for girls and young women aged 4–18 years. We lease the land and own the building, which includes a meeting hall, kitchen, storage facilities and toilets, and was recently improved to include an access ramp for wheelchair users, accommodating a current user with physical disabilities. In addition to the outside space included within our leased plot, we have access to the school playing fields, through kind permission of the headteacher of Fir Tree School. To our understanding, this lease arrangement has been in place for approximately 60 years. The location is central and affordable, allowing Girlguiding to be offered as an affordable activity for as many families as possible and enabling many of our young members to walk/cycle to their meetings, including walking independently of their parents when they are old enough to do so.

We believe this request is relevant to the plan in conjunction with the provisions of Chapter 9, and various other clauses, including LO1: To protect, improve and extend existing leisure and community facilities including formal and informal recreation spaces, allotments and indoor facilities to meet the needs of the increased population of the area and as described in the development plan. LO2: New developments will support the leisure needs of future residents, either by providing leisure facilities on site or by direct contribution through Section 106 and CIL funds. LO3: To protect and improve the capacity and quality of all existing leisure assets so that they are accessible, vibrant and have sufficient capacity. LO4: To improve play facilities for young children by improving existing play areas and by the provision of additional play areas. LO5: To support the creation of a leisure hub and meeting place for families and teenagers. LO6: To support the provision of new facilities for teenagers in the town.

May we please request a meeting with representatives of the town council and SODC to discuss what options we may be able to explore to continue the existence of a Girlguiding hub in Wallingford, either remaining within the upgraded school site or elsewhere in the town centre.

4 If appropriate, you can set out what change(s) you consider necessary to make the plan review able to proceed below.

What changes do you consider necessary for the plan to meet the basic conditions?:

You can upload supporting evidence here:

No file uploaded

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Public hearing

Please state your specific reasons for requesting a public hearing below:

Public hearing textbox:

Finally...

14 How did you find out about the Wallingford Neighbourhood Plan Review consultation? Please tick all that apply.

Other, please specify: