

South Oxfordshire Local Plan 2034

Publication Version

Representation Form

Please return by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent Business or organisation Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text"/>	<input type="text" value="Mr"/>
Full Name	<input type="text"/>	<input type="text" value="Brian Flynn"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate"/>
Organisation (where relevant)	<input type="text" value="Croudace Homes Ltd"/>	<input type="text" value="Carter Jonas LLP"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="One Station Square"/>
Address Line 2	<input type="text" value="The Spirella Building"/>	<input type="text"/>
Address Line 3	<input type="text" value="Bridge Road"/>	<input type="text"/>
Postal Town	<input type="text" value="Letchworth, Hertfordshire"/>	<input type="text" value="Cambridge"/>
Postcode	<input type="text" value="SG6 4ET"/>	<input type="text" value="CB1 2GA"/>
Telephone Number	<input type="text"/>	<input type="text" value="██████████"/>
Email Address	<input type="text"/>	<input type="text" value="████████████████████"/>

Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

Policy WAL1

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Policy WAL1 of Final Publication version of South Oxfordshire Local Plan 2034 (FPSOLP2034) sets out the strategy for Wallingford. Croudace Homes has three concerns with the strategy for Wallingford:

- It does not deal with the issues that need to be addressed in Wallingford;
- There is an over-reliance on the Neighbourhood Plan process to meet development needs;
- There is a need to allocate additional land in Wallingford to meet a higher housing requirement and as an alternative to strategic allocations in the Green Belt, including land at Berinsfield (Policy STRAT10).

Croudace Homes is promoting land at Wantage Road in Wallingford as an additional or alternative strategic allocation; the proposed development at this site and the key aims and objectives and design principles for the additional strategic allocation policy are set out below.

The planning background to the Croudace Homes site provides the context to the representations to FPSOLP2034. Wallingford is identified as a market town in the settlement hierarchy, but only a limited amount of housing development is directed to this settlement through FPSOLP2034 with a reliance on two large developments. The land at Wantage Road was identified as a preferred housing site through the earlier stages of the Wallingford Neighbourhood Plan, for approximately 500 dwellings. Croudace Homes decided not to pursue a planning application at the site because of the apparent favourable outcome for a residential-led development emerging through the Wallingford Neighbourhood Plan process. The latest version of the Wallingford Neighbourhood Plan published in September 2018 did not allocate the site, on the basis that two other large developments have received support from South Oxfordshire District Council (one with planning permission and the other with a resolution to grant permission). The land at Wantage Road has been promoted for residential development through all previous stages of SOLP and through the emerging Wallingford Neighbourhood Plan. A range of development options have been put forward through the plan-making processes; a smaller development was promoted through the Wallingford Neighbourhood Plan to reflect the part of the site within the town boundary and the neighbourhood plan area. In summary, the following development options for the site have been promoted:

- Wallingford Neighbourhood Plan:
 - Option 1 – up to 226 dwellings on approximately 12 hectares
 - Option 2 – up to 477 dwellings on approximately 22 hectares
- South Oxfordshire Local Plan:
 - Option 1 – up to 552 dwellings on approximately 25 hectares
 - Option 2 – up to 1096 dwellings on approximately 54 hectares

Paragraph 4.74 of the Second Preferred Options version of the South Oxfordshire Local Plan in March 2017 identified a range of issues that need to be addressed in Wallingford, and stated that:

“Issues that need addressing in the town are:

- *The declining retail function of the town centre*
- *The re-use of the former Waitrose store needs a permanent solution*
- *The potential of the town to attract visitors is not fully exploited*
- *Some facilities, for example some schools, are at capacity*
- *The need for affordable housing remains high despite recent new building*
- *The average overall rating of the Hithercroft Industrial Estate, the town’s main employment area*
- *The Open Space, Sport and Recreation Facility Assessment showed there were areas for improvement*
- *There are local air quality problems*
- *A higher percentage of over 65s than the average for the District, county and South East*
- *To encourage use of the River Thames.”*

These issues still exist and need to be addressed, but the strategy for Wallingford set out in Policy WAL1 effectively ignores those issues which represents a negative and inappropriate approach. The improvements to the retail function of the town centre, the supply of affordable housing and capacity at the primary school are unlikely to be resolved without further large allocations in the town. It is requested that the previous issues for Wallingford are restated in the supporting text to Policy WAL1.

As set out in Croudace Homes’ representations to Policy H3, it is considered that the neighbourhood plan process is an inadequate mechanism for considering strategic scale development, and that is particularly the case at Wallingford. The designated area for the emerging Wallingford Neighbourhood Plan is quite tightly drawn around the town boundary, with the area covered by the Brightwell-cum-Sotwell Neighbourhood Plan adjacent to the northern and western boundary. The ‘made’ Brightwell-cum-Sotwell Neighbourhood Plan allocates a number of small sites for housing on the edge of the existing village. The emerging draft Wallingford Neighbourhood Plan published in September 2018 does not include any housing allocations. The neighbourhood plan process has not adequately addressed the growth of Wallingford, despite it being designated as a market town and one of the most sustainable settlements in South Oxfordshire. The boundaries of adjacent designated Neighbourhood Plan areas means that strategic scale development on the edge of Wallingford has not been considered through the neighbourhood plan processes.

It is noted that an earlier version of the emerging Wallingford Neighbourhood Plan identified part of the site promoted by Croudace Homes as the most suitable location for a housing allocation (Ref: Land North of Wallingford (east) - Site A2), but this site has not been carried forward because subsequently planning permission has been granted for one major residential development in Wallingford and it was resolved to grant permission for another. The planning application process and the housing land supply shortfall that previously existed means that the Wallingford Neighbourhood plan process was effectively bypassed. It is anticipated that the two major residential developments in Wallingford will be delivered in the short term, and as such no residential development of any significance is proposed in the middle and later years of the plan period, which represents an inappropriate strategy. The emerging Wallingford Neighbourhood Plan process does not address future housing and affordable housing needs because it makes no allocations.

It is considered that there are no significant constraints to further development in Wallingford above and beyond existing commitments. A Development Framework Document ('DFD') has been prepared for the land off Wantage Road in Wallingford, promoted by Croudace Homes. In summary the proposed development comprises up to 1,096 dwellings, land for a primary school and local centre, a new link road across the north of Wallingford between Shillingford Road and Calvin Thomas Way, together with strategic landscaping and a country park. The DFD is submitted with these representations.

The DFD has been informed by a number of technical assessments, including a Preliminary Landscape and Visual Appraisal, Preliminary Ecological Appraisal, a Strategic Highways Technical Note, topographic survey and tree survey, Preliminary Archaeological Appraisal and Phase 1 Ground Conditions Assessment, which have helped identify potential constraints and opportunities as part of a masterplanning process, supported by the aspirations of Croudace Homes to deliver a well-designed and integrated addition to Wallingford that meets the needs of existing and future residents. The Highways Technical Note demonstrates that the proposed scale of development can be adequately accommodated and mitigated within the local highway network.

The relationship with the adjacent North Wessex AONB and wider landscape has been taken into account, and opportunities exist to enhance biodiversity and create new connections for walking, cycling and public transport.

The DFD identifies two initial development options for the site, which are shown on pg.20 of the document, and are as follows:

- The first option uses only the southern field, extending only as far as the existing shelterbelt. This option allows for between 490 and 552 dwellings to be provided at a net density of 30-35 dwellings per hectare.
- The second option uses the entire site to provide an urban extension of between 972 and 1,096 dwellings, alongside substantial areas of open space, including a country park. The proposed development also includes land for a primary school and local centre. The proposed development could also provide land or buildings for additional community facilities that are needed in Wallingford.

It is noted that it is proposed in Policy STRAT 5 of FPSOLP2034 that the minimum net densities for strategic developments in Wallingford is 50 dwellings per hectare. If those densities were applied to the promoted site at Wantage Road in Wallingford the proposed development could deliver between 1,144 and 2,418 dwellings. However, it is likely that the quantum of development or the developable area would be reduced to deliver additional green infrastructure and strategic landscaping to reflect the character of the settlement edge and the setting of the AONB.

The DFD also considers the potential for including adjoining land, which is currently under promotion by Gallagher Estates, for a single, comprehensive form of development that would help satisfy the longer term housing requirements (including affordable) of Wallingford.

It is considered that the proposed development as outlined in the DFD would address and resolve a number of the identified issues in Wallingford.

The site was assessed as part of a larger site in the Strategic Housing & Employment Land Availability Assessment (SHELAA) in October 2017 - Site Ref. 928. The assessed site included the adjacent parcel of land to the west. The adjacent site was also considered through the Wallingford Neighbourhood Plan process (Ref. Land North of Wallingford (west) - Site A1), but was assessed as less suitable compared against the Croudace Homes site (Site A2), for reasons of remoteness from Wallingford and traffic impact on Wantage Road.

Regardless of the fact that the SHELAA considered the larger site, the assessment identified no significant constraints to development and concluded overall that the site is suitable, available and achievable and is suitable for housing.

As set out below, the relationship between the Croudace Homes site and the adjacent AONB has been taken into account in the green infrastructure and landscape strategy for the proposed development. We request that the assessment of the site in the SHELAA is considered alongside the previous assessment in the 2013 SHLAA and the recent assessment in the emerging Wallingford Neighbourhood Plan.

We note that the need for affordable housing in Wallingford remains high, despite recent developments. This supports the point made in our response to Policy STRAT 2, which is that a higher housing target should be selected to address the current affordable housing needs across South Oxfordshire and in Wallingford in particular.

Wallingford is defined as a market town because it has a good range of services and facilities, including shops, schools, hospital, library, post office, sport, leisure and recreation. Wallingford contains an industrial area within the town, and it has good connections to employment opportunities at Oxford and Science Vale. It is accessible to Oxford, Reading, Didcot and other nearby towns and villages by bus. Wallingford is on the National Cycle Network (Thames Valley Route No.5) which provides connections to Didcot and there are local designated cycle routes within the town and the surrounding area, making it accessible by cycle. National guidance links patterns of growth with sustainable modes of transport, and seeks to encourage the use of public transport, walking and cycling; Wallingford would satisfy this preferred approach. In terms of the housing market, Wallingford could deliver less expensive market housing and policy compliant levels of affordable housing, which sites within and on the edge of Oxford and at some of the nearest villages to the City are unable to do.

Policy WAL 1 should be amended to allocate Land off Wantage Road to reflect the quantum of development that is deemed necessary for Wallingford, taking into account Oxford's unmet housing need, the additional level of development required to fully meet the district's affordable housing need, and the direction of growth to sustainable locations (as defined by the settlement hierarchy). As set out in the DFD, Land at Wantage Road has the ability to accommodate 1,096 homes as part of a strategic urban extension to Wallingford, which will help address the town-wide issues that public consultation has identified.

A new policy is required to specifically allocate land off Wantage Road in Wallingford. Wallingford is a suitable location for additional development, and decisions about its growth and allocations to accommodate that growth should be made through FPSOLP2034 rather than the neighbourhood plan process.

Proposed Additional Strategic Allocation – Land at Wantage Road, Wallingford

The aspirations of Croudace Homes are to deliver a well-designed and integrated development that meets the needs of existing and future residents. The vision for the Land North of Wallingford East (Wallingford Northern Gateway) is to create a vibrant new integrated neighbourhood, providing an attractive northern edge to the town that is set within well-maintained landscape and open space. The relationship with the adjacent North Wessex AONB and wider landscape has been taken into account, and opportunities exist to enhance biodiversity and create new connections for walking, cycling and public transport.

The aims and objectives of the proposed development are as follows:

- To work in partnership with the Wallingford Neighbourhood Plan Group, South Oxfordshire District Council, the local community and other key stakeholders.
- To create a place that will stand the test of time.
- To enhance the northern gateway to Wallingford and subsequent sense of arrival.
- To create a place that generates value and benefits the local community.
- To carry Croudace Homes' signature style and character
- To use materials that reflect Croudace Homes' commitment to quality and sustainability.
- The built form to have contemporary regard for the vernacular architectural character, and its arrangement to reflect the forms of settlement that are typical of the surrounding area.

- To create a contextually sensitive scheme which creates a new residential community within a robust landscape framework, and provides an attractive gateway to Wallingford.
- To bring a renewed sense of identity to the surrounding area.
- To deliver enduring value for all and create a place of character and quality.
- To create a range of homes for first time buyers through to executive homes.
- To create a naturally defined edge to the town.
- To achieve the most efficient use of the site whilst minimising traffic impacts on the local road network and environmental impacts on the surrounding area.

In summary, the key design principles of the proposed development are as follows:

- Local people should play a meaningful role in shaping development and managing the new neighbourhood, contributing to a sense of community.
- The form and characteristics of the development should help to meet identified housing needs of Wallingford and should integrate with the existing community. The development should benefit from a strong sense of place and distinctive character, with high standards of urban design and architecture.
- Existing vegetation should be retained wherever possible. A landscape scheme for the site should offer benefits both to residents and wildlife. This may include expanses of accessible green space and recreation areas, along with wildlife corridors linking ecological features. The site may also be able to help to address existing open space deficiencies in the town.
- Coalescence with Brightwell-cum-Sotwell should be avoided, with built development drawn back from those parts of the site which are closest to the village, making use of the significant landscape buffer which runs along the northern edge of the site.
- Access should be provided from Shillingford Road, with potential to divert existing bus routes through the site. The scheme should encourage non-car travel into the town centre through the provision of safe pedestrian and cycle linkages to both the town centre and to Hithercroft Industrial Estate, as well as public transport options to help address traffic congestion and car parking issues in the town.
- Higher density housing should be located adjacent to the existing residential built edge of the town, graduating to medium density housing towards the north of the site. Low density housing should be located around the northern fringe of the developable area to reduce the impact of residential development on the AONB and open countryside.
- Contributions towards primary school education and other facilities, subject to discussions with South Oxfordshire District Council and Oxfordshire County Council, and in line with the Infrastructure Delivery Plan for the district.
- Provision of a sustainability strategy the new neighbourhood, which may include energy efficiency measures including high levels of insulation and buildings designed with good thermal performance, through to the use of renewable technologies to meet energy demands.
- Effective measures should be put in place for the long-term management of the new community to ensure its future prosperity.

The proposed development would meet all of the design and other policy requirements specified in FPSOLP2034 and national guidance, including affordable housing. As set out above, if appropriate the density of the proposed development could be increased to meet the 50 dwellings per hectare requirements for strategic developments in Wallingford as specified in Policy STRAT5.

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

It is requested that land off Wantage Road in Wallingford is identified as a strategic allocation, and a new policy for the allocation should be included in the Wallingford section of FPSOLP2034, at Paragraphs 4.138 to 4.141.

The submitted Development Framework Document for land at Wantage Road and the identified aims and objectives and key design principles could form the basis for the specific policy requirements for the proposed strategic allocation policy.

A range of development options are possible, subject to housing needs and the under-delivery or non-delivery of other strategic allocations. Those options are as follows:

- Option 1 – up to 226 dwellings on approximately 12 hectares
- Option 2 – up to 477 dwellings on approximately 22 hectares
- Option 3 – up to 552 dwellings on approximately 25 hectares
- Option 4 – up to 1096 dwellings on approximately 54 hectares

(Continue on page 4 if necessary)

Would you like to participate at the oral part of the examination, which takes place as part of the examination process? *

Yes

No

* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:

(this can be electronic)

Date:

18/02/19

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit www.southoxon.gov.uk/dataprotection

Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

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