

## South Oxfordshire Local Plan Proposed Main Modifications Consultation Comment Form

**Please return by midnight on Monday 2 November 2020** via email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

This form has two parts:  
**Part A** – contact details  
**Part B** – your comments

### Part A

Are you responding as an: (please tick)

Individual

Business or organisation

Agent

A name and contact details are required for your comments to be considered.

#### 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="Michael Knott"/>
Organisation (if relevant)	<input type="text"/>	<input type="text" value="Barton Willmore LLP"/>
Job Title (if relevant)	<input type="text"/>	<input type="text" value="Director"/>
Address Line 1	<input type="text"/>	<input type="text" value="The Blade"/>
Address Line 2	<input type="text"/>	<input type="text" value="Abbey Square"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text" value="Reading"/>
Postcode	<input type="text"/>	<input type="text" value="RG1 3BE"/>
Telephone Number	<input type="text"/>	<div style="background-color: black; width: 100%; height: 20px;"></div>
Email Address	<input type="text"/>	<div style="background-color: black; width: 100%; height: 20px;"></div>

### Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who acts as a point of contact between the Council, Inspector and respondents.

This means that you may be contacted by the Programme Officer or the Council with updates and in relation to any necessary consultations on the Local Plan. This is in accordance with Regulation 19 and 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 102 of The Conservation of Habitats and Species Regulations 2017.

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.

Comments submitted by individuals will be published on our website, alongside their name. No other contact details will be published. Comments submitted by businesses and/or organisations will be published, including contact details.

Please refer to our Privacy Notice regarding how your personal data is used for this consultation, available on our website [southoxon.gov.uk/newlocalplan](https://southoxon.gov.uk/newlocalplan). If you would like to know more about the councils data protection registration or to find out about your personal data, please visit: [southoxon.gov.uk/dataprotection](https://southoxon.gov.uk/dataprotection)

### Future contact preferences

As explained above, 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 consultation 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

## Part B – Please use a separate sheet for commenting on each proposed main modification or consultation document

You can provide your comments on the Emerging South Oxfordshire Local Plan Proposed Main Modifications in this section.

The list of documents you can comment on are:

- Schedule of Proposed Main Modifications
- Schedule of Policies Map Changes
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Addendum

**Please note we are inviting comments on the Proposed Main Modifications and documents listed above only - this is not an opportunity to make comments on any other part of the Plan.**

If you are commenting on the Main Modification document, please provide the main modification number (for example MM1) in the box below.

If you are unsure of the 'modification number', please refer to the Schedule of Proposed Main Modifications.

If you are commenting on any of the other consultation documents (for example the Sustainability Appraisal Addendum), please provide the relevant section, paragraph or page number in the box below:

Modification Number or Document, section, paragraph or page number

MM21 (Policy WAL1); and  
MM25 (Policy H3).

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

If you wish to include any supporting documents, please attach them to this comment form.

Please see the attached covering letter.

(Continue on page 5 if necessary)

If your comments cover more than the boxes provided, please use the space below to provide a summary. You are not required to summarise your comments, but a summary would help us in our reporting.

Please provide your summary below:
Please see the covering letter attached.

**Thank you for your comments.**

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South Oxfordshire District Council,  
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**BY EMAIL: [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)**

28<sup>th</sup> October, 2020

Dear Sir/Madam,

**SOUTH OXFORDSHIRE DISTRICT COUNCIL LOCAL PLAN 2035:  
RESPONSE TO THE SCHEDULE OF PROPOSED MAIN MODIFICATIONS (SEPTEMBER 2020)  
REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES**

We write on behalf of our clients, L&Q Estates (formally Gallagher Estates), in response to the South Oxfordshire Local Plan: Schedule of Proposed Main Modifications (September 2020) ('the Proposed Main Modifications') in respect of our site 'Land North of Wilding Road, Wallingford' (hereafter referred to as 'the Site'). Please note that our response to this consultation should be read in conjunction with our Hearing Statement and previous representations which have been submitted as part of the ongoing South Oxfordshire District Council (SODC) Local Plan Examination.

L&Q Estates controls the land which is immediately to the north of Wallingford, specifically north of Wilding Road and east of Wantage Road. The Site has not been included in the South Oxfordshire Local Plan 2035 as a proposed allocation and is an omission site. The Site, together with the land situated immediately to the east (controlled by Croudace Strategic) was assessed as a comprehensive development through the South Oxfordshire Core Strategy (adopted 2012), previously known as 'Site A'.

The main modifications which are responded to in these representations are as follows:

- MM21 (Policy WAL1); and
- MM25 (Policy H3).

Overall, L&Q Estates are supportive of the Proposed Main Modifications subject to resolving matters in relation to Wallingford. We have suggested further modifications which are shown as either struck-through (suggested deletions) or highlighted in **bold** (suggested additions) where the proposed wording set out in the Proposed Main Modifications is considered to be unsound.

In making these representations, L&Q Estates are seeking to ensure that Wallingford's housing need is met in the future through the ongoing promotion of our Site for consideration in the next Local Plan Review.



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## Policy WAL1: The Strategy for Wallingford (MM21)

We are broadly supportive of the modification to Policy WAL1 which requires Neighbourhood Development Plans to satisfy the criteria set out in the policy (in addition to stating that the Council will support development proposals which satisfy the criteria. However, it should be made clear that whereas Policy WAL1 'expects' Neighbourhood Development Plans to satisfy all of the criteria set out in the policy, in respect of development proposals, the Council will support them where one or more of the criteria are satisfied. For example, it will not be feasible for all development proposals to contribute towards criteria iii), iv) and v) in respect of existing employment areas).

We propose the following modification to Policy WAL1 to address this soundness issue:

1. Neighbourhood Development Plans are expected to and, where relevant, the Council will support development proposals that:

....

- vii) address air quality issues in the town centre: and/or

Turning to the criteria in Policy WAL1, we also broadly support the modification which amends the first criterion stating that homes should be delivered in accordance with Policy H3. We comment on this separately below in relation to MM25.

MM21 inserts a new criterion (viii)) to Policy WAL1. Supporting the provision of new or enhanced community facilities that meet an identified need. We support the addition of this criterion to Policy WAL1 so it is consistent with the equivalent policies for Thames and Henley-on-Thames. We are, however, concerned that the timing of this modification to Policy WAL1 of the emerging Local Plan (eLP) means that the Wallingford Neighbourhood Development Plan (WNDP) both fails to accord with this criteria and that the Examiner appointed to assess the WNDP will fail to take this into account.

It is clear from the written statement submitted by Wallingford Town Council (WTC) that there are serious concerns regarding the capacity of existing services and infrastructure to meet needs arising from additional housing growth. Indeed, this was part of the case presented by WTC and SODC to the Examination justifying why no more housing would be allocated to Wallingford.

The WNDP has already progressed to an advanced stage, currently subject to an examination. The WNDP states:

**"9.2.29 Wallingford School is already operating at its capacity of an intake of 190 pupils per year and is heavily over-subscribed with a waiting list. From 2019 children within the former catchment area of Wallingford School have been allocated to schools at substantial distances from the town, such as Henley and Didcot. This has implications for the cost and sustainability of travel for the affected families."**

**"9.2.30 The overall population of Wallingford and surrounding villages will grow with more housing, and this will result in increased pressure on existing education facilities."**

Despite this assessment of need, the WNDP fails to plan to provide for new or enhanced secondary education to meet this identified need. WNDP Policy CF7 (Education Provision) serves only to ensure that residential development will be required to mitigate their impacts, duplicating with policies in the adopted Core Strategy and eLP.

In the context of modified wording of Policy WAL1, and our view that the WNDP fails to accord with it, it is important that the WNDP Examiner will give due consideration to this issue.

In the event that the WNDP is made, absent of any strategy for meeting this identified infrastructure need, L&Q Estates encourage WTC, SODC and Oxfordshire County Council (OCC) as the local education authority, to engage constructively with landowners, promoters and developers, to bring forward a strategy for meeting this identified infrastructure need. In particular, the potential for land to the north of Wallingford (Site A) which offers the opportunity to deliver a site for new secondary education provision.

Finally, we have concerns that the modification to para 4.410, as currently worded, would encourage landowners to discuss speculative development proposals with the Town Council and neighbourhood planning group and suggests that support should be 'attained'. However, it is worth noting that the Town Council's support may not be forthcoming even for development proposals even where they do not conflict with the Development Plan, and more likely for proposals which need to be assessed against Paragraph 11d) of the National Planning Policy Framework (NPPF).

On this basis, the following modification to paragraph 4.410 is recommended:

...it [Wallingford Neighbourhood Plan] will form part of the Development Plan for South Oxfordshire. **Prior to submitting a planning application**, the Council encourages landowners to discuss development proposals with the Town Council and neighbourhood planning group to **seek** support for the scheme, ~~if possible, prior to submitting a planning application.~~

### **Policy H3: Housing in the Towns of Henley-on-Thames and Wallingford (MM25)**

L&Q Estates welcome the proposed modification to Policy H3 which confirms that the housing requirement of 3,873 homes to be delivered in the Market Towns of Henley-on-Thames, Thame and Wallingford is a minimum. This includes 'at least' 1,070 homes to be delivered in Wallingford. This amendment is welcomed as it provides greater flexibility for higher levels of housing provision to be assessed through neighbourhood plans to meet demonstrable local housing needs at Wallingford.

Due to the advanced stage of the WNDP process (which, as stated above, has reached its examination), we are concerned that the WNDP has not and will not be supported by a robust assessment of local housing needs including specialist and affordable housing needs where it could result in housing provision in excess of the outstanding requirement.

Furthermore, the minimum housing requirement of 1,070 homes is significantly below the total number of homes which are to be already identified at Wallingford through completions and commitments (1,413 homes as of 31 March 2019). We acknowledge and welcome that it is expressed as a minimum, however, in our view, setting a housing requirement for Wallingford some 343 homes less than is already identified through completions and commitments up to 2035 does not constitute a positively prepared approach.

As a starting point, we seek modifications to Policy H3 so that the minimum housing requirement for Wallingford is 1,413 homes, with higher levels of housing provision to be assessed as part of the WNDP and a future WNDP Review.

We recommend the following:

- “1. A minimum housing requirement of ~~3,873~~ **4,216** homes will be collectively delivered in the town of Henley-on-Thames, Thame and Wallingford as follows:
  - i) Henley-on-Thames: at least 1,285 homes
  - ii) Thame: at least 1,518 homes
  - iii) Wallingford: at least ~~1,070~~ **1,413** homes
2. Neighbourhood Development Plans.....”

We trust that the above comments are of assistance to the Inspector and would be grateful to receive confirmation that these representations have been received and registered as being 'duly made'. Please do not hesitate to contact the writer on [REDACTED] [REDACTED] [REDACTED] or [REDACTED] should you have any queries in relation to the above.

Yours faithfully,

**MICHAEL KNOTT**  
Director

Encs.