



# Comments on the Local Plan Part 1 – prepared 8<sup>th</sup> May 2013

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## Executive Summary:

Within this document we provide comments on all sections of the Local Plan Part 1. This summary highlights points which are of particular importance and of relevance throughout the Plan.

1. The figures for housing need identified in the Plan are based on unsound principles and are substantially too high.
2. Because of their different characters and the poor communication between them, Wantage and Grove and their surrounding villages should be treated as a separate sub-area for the purposes of planning from Milton Park, Harwell Oxford and the Didcot fringe.
3. Allocating housing disproportionately to Wantage and Grove is inappropriate because employment will be elsewhere and there are inadequate transport links to the areas of employment.
4. Inadequate attention has been paid to problems of flooding at the strategic sites around Wantage and Grove.
5. Wantage and Grove currently lack adequate facilities in terms of education, health, leisure, public transport and roads. There should be no plans for a significant increase in the population of this area without substantial enhancement of this infrastructure as a pre-condition. It is not sufficient to rely on minor developer-funded improvements staged over a long period.
6. No emphasis is given to the protection and rejuvenation of Wantage Town Centre even though Botley and Abingdon have separate policy statements.
7. The Plan fails to respect the spirit of the National Planning Policy Framework in relation to proximity of homes to work, greenhouse gas emissions and the need to find ways to enhance and improve the places in which people live their lives



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## Introduction:

As the foreword to the plan states, the Vale of the White Horse has two key strengths:

- It is a beautiful rural district; our heritage sites and our villages define what makes it such a desirable place to live.
- It also has a dynamic local economy and is home to Science Vale UK, one of the country's most progressive and thriving areas of cutting edge high-tech business and research.

The document under review is the draft Local Plan 2029 Part 1: Strategic Sites and Policies released 28 February 2013. This Local Plan Part 1 (LPP1) will set out the strategic priorities for the district to deliver sustainable development.

The LPP1 states that the District Council will ensure that these strengths are protected and will continue to make an important contribution to supporting our vibrant rural economy.

The LPP1 will identify the number of new homes and jobs to be provided in the area for the plan period up to 2029. It will also make appropriate provision for retail, leisure and commercial development and for the infrastructure needed to support them. The plan will set out the Spatial Strategy for the appropriate location of development across the district, and will allocate large scale (referred to as strategic) development sites. It will include district-wide policies to ensure that development contributes to meeting the Strategic Objectives of the plan, such as policies relating to sustainable construction and protection of the built, historic and natural environment.

A Key Outcome listed in the LPP1 is to “provide 13,294 new homes with a mix of house types, sizes and tenures to meet local needs, including specialist housing for older residents and people with disabilities”. This figure will be updated before the next version of the plan is produced for consultation.

We believe this number of homes is not sustainable in the Vale where much of the land cannot be built on because it is Green Belt, AONB or a flood plain. The available land is limited to an area to the north of the AONB which forms a corridor between the AONB and the River Ock. This is a beautiful rural district sandwiched between Swindon to the West and the Didcot Power station to the East. Its character is important to the area and should be maintained.

The government housing projections for the area suggest a growth rate of less than 8% for the next 10 years and we believe that such a growth rate is achievable without changing the character of the town and villages in this corridor. A significantly higher growth rate would be very difficult to absorb and would have a detrimental impact on the desirability and attractive nature of the Vale. There are few brownfield sites and much of the area is quality farm land which should be protected if the South East of England is to maintain its reputation as the breadbasket of the Country.



## Basis of the Plan:

The Vale is a predominantly rural area located in south-west Oxfordshire and is bounded to the north and the east by the River Thames and to the south by the North Wessex Downs Area of Outstanding Natural Beauty (AONB). It is an attractive and popular place to live and contains parts of the Oxford Green Belt.

The Vale is located between the larger centres of Swindon, to the south-west; Oxford, to the north-east; Newbury, to the south; and Didcot, to the south-east. These centres are expected to continue to grow in the future and we need to plan effectively so we can benefit from this change.

## Our response:

*The district includes the majority of the Science Vale UK area, an internationally significant location for innovation and science-based research and business. Within the Vale, this area includes the two Enterprise Zone sites at Harwell Oxford and Milton Park. These sites are expanding and will offer new jobs for local people, but will also present challenges for which the Local Plan 2029 Part 1 should plan. By definition, innovation and science-based research are not labour intensive businesses. They also require a majority of the staff to be on-site, working as teams, performing research.*

*The key tenet behind the plan is sustainability and it would be very useful to have a carefully defined definition of sustainability. We propose a definition in terms of:*

- *Housing need (assisting to meet the agreed housing needs for the next 5 years);*
- *Spatial strategy (providing housing in an area which does not affect AONB or Green Belt and which will not have an adverse impact on flood plains, or reduce the attractive and unique character and identity of the area);*
- *Provides the services required by the community it will create;*
- *Contributes to the maintenance and enhancement of the wider community to the extent that none of the services currently enjoyed by the wider community are impaired but may be improved;*
- *Reduces the overall carbon emissions of the Vale;*
- *Protects and supports the local environment.*

## Core Policy 1: Presumption in Favour of Sustainable Development

The detail of the policy states that “Planning applications that accord with this Local Plan (and where relevant, with any subsequent Development Plan Documents or Neighbourhood Plans) will be approved, unless material considerations indicate otherwise”.

## Our response:

*We assume that this means that any planning applications must meet the sustainability criteria defined in the plan (proposed definition above).*



## Core Policy 40: Delivery and Contingency

The policy is not fully defined but the Infrastructure Delivery Plan considers the impact of growth from the Local Plan 2029 Part 1 in the Vale of White Horse District. This is a live document that will be updated throughout the plan period.

The Council has adopted a categorisation for each infrastructure item, to reflect its importance to the delivery of the Local Plan 2029. The categories used are:

**Critical** - The identified infrastructure is critical, and development cannot commence without it being in place. E.g. transport/utility infrastructure

**Necessary** - The identified infrastructure is also critical to support new development, but the precise timing and phasing is less critical and development can commence ahead of its provision. E.g. schools/primary health care

**Preferred** - The delivery of the identified infrastructure is preferred in order to build sustainable communities. Timing and phasing is not critical over the plan period. E.g. libraries, green infrastructure, youth provision

### Our response:

*While road enhancements may not be Critical they are VERY necessary and should be scheduled very early in any developments as should the provision of primary and secondary schools. We do not want to wait 3-5 years for these core components of the infrastructure.*

*We believe that if the aspiration of the Vale to be Low Carbon is to be taken seriously then the provision of local pedestrian and cycle links should be at least necessary if not critical.*

*The preferred classification includes some items that are important (such as public transport - local town services, public rights of way improvements, provision of internal greenways for walkers, cyclists and horse riders, improvements to or replacement of the Wantage leisure centre, a specialist health and wellbeing centre and enhancements to local library services) and other items that are nice to have (such as community art). These should be separated.*

*BUT no mention anywhere of improving parking facilities in Wantage Town Centre and rejuvenating the Town Centre - surely these should appear as necessary.*





## Housing Need:

The version of the local plan being consulted on is based on housing need evidence that supported the South East Plan. The housing requirement figures in the final local plan are likely to be different.

### Our response:

*We assume that this is partially because the South East Plan is being revoked, but also because the South East Plan was prepared in 2007/8 before the recession, and the recessionary environment since then means that the targets may be unrealistic. Nevertheless, the council say that it is a sound basis for this early draft of the Local Plan and will allow everybody to let the district council know if the plan is heading in the right direction.*

*We have found it difficult to comment on the plan as the underlying assumptions on housing need are so far out of date.*

## Core Policy 3: Housing Delivery

Core Policy 3 identifies the scale and location of housing to ensure growth in the Vale of White Horse is delivered in the most sustainable manner. The proposed housing target is for at least 13,294 homes to be delivered in the plan period between 2006 and 2029.

### Our response:

*LPP1 does not define the current status of housing delivery against that target in terms of:*

- *approved applications (approved defined as reserved matters agreed and no further barriers to building exist);*
- *built, and*
- *occupied.*

*We believe the proposed housing target to be totally unrealistic. One of the Conservatives' manifesto pledges was to overturn the housing quota system imposed by the previous Labour government; this has not happened.*

*The new figures from the Government give housing projections for the Vale from 2011 to 2021 of 7.78% (from 49,781 to 53,656). So extrapolating that from 2021 to 2029 by adding another 8 years of growth at the same rate, it means a growth of 14% from 2011 to 56,756. That is a total of 6,975 houses from 2011 to 2029.*

*The total housing target for the Vale of the White Horse (according to the Local Plan) is 13,294 but this covers the period from 2006 to 2029. The absence of a Census in 2006 means that the District Council does not have accurate housing numbers for 2006. The census for 2001 said that we had 45,842 households in the Vale and in 2011 we had 49,781 so if we take the difference and spread it evenly then we would have had 47,812 homes in 2006. To get to the projected Government figure of 56,756 by 2029 that would give us growth of 8,945 houses for the entire Vale. This is still 4,350 less than the figure in the local plan.*



*We understand that the new Strategic Housing Market Assessment is being commissioned jointly with the other Oxfordshire authorities in order to assess the whole housing market area. The work itself will be undertaken by an independent consultant who has not yet been appointed. As part of the brief the consultant will need to ensure that the assessment is robust and in conformity with the DCLG SHMA Practice Guidance published in 2007. The guidance requires the consultants to engage with stakeholders where relevant to the technical exercise they are undertaking. We would hope that that would mean engaging with the Campaign Group as part of the work.*

The Guidance Notes suggest that as part of this process, it may be useful to review existing local and regional policies to determine the key issues, policy aspirations for the area and the role of housing in delivering the spatial vision for the community.

*We believe it is also important to ensure that the consultants are very clear that the current policies are based on the South East Plan which has been revoked and therefore these policies are also subject to review and challenge and that the magnitude of the growth was the result of a government requirement based on a growth market which may not be repeated within the lifetime of this plan.*

*The guidance notes also state that housing market partnerships are responsible for agreeing the methods and data sources to be used. Partnerships will need to consider which data sources and methods will enable them to derive robust assessments of housing need and demand. There are several issues that partnerships will want to consider when making these decisions and methods should be discussed and agreed within the partnership so stakeholders who have a key interest can express their views. We would like to be included in these discussions to ensure that the residents of the Wantage and Grove area are fully represented.*

*It is important to note that the results of the SHMA will only provide a Needs Assessment and the SHMA does not look at the other factors included in the local plan which will reflect the impact of the housing need on the local area and the current infrastructure. This is a further area where we would like to participate to ensure that plans can be realistic, proportionate and sustainable.*

As Councillor Murray stated so eloquently at the Stakeholder meeting in March 2013; the Vale has a very difficult environment with Green Belt land; Areas of Outstanding Natural beauty; Flood plains etc..

*This is not a reason to fill all other land with new build developments and to turn the Vale of the White Horse into a new version of Slough.*

The plan talks about the need to plan effectively for the Vale in partnership with our neighbours and that we have a 'duty to cooperate' on key cross boundary issues. Examples include:

- planning effectively for housing, employment and infrastructure delivery for Didcot and the wider SVUK area in cooperation with South Oxfordshire District Council and Oxfordshire County Council providing a robust approach to meeting the longer term growth needs of the wider Oxfordshire area

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- working with the Science Vale UK steering group and other partners to facilitate the delivery of increased skills and knowledge
- continuing to work with the Highways Agency to identify long-term solutions to help address congestion on the A34, and
- working positively with Swindon Borough Council to help ensure the proposed development to the east of Swindon does not adversely affect the west of the Vale and its rural villages.

*It does not talk about the impact of the developments around Swindon and in Berkshire on the Vale in terms of jobs, transport or any environmental effects. We would like to see these aspects also included. The Ridgeway and the River Ock mean that Wantage and Grove are in a natural channel from Swindon to Reading and commuter traffic flows in both directions along this channel – particularly when (as often happens) there are problems along the M4.*

*Core Policy 3 goes on to allocate the housing targets by sub-area and strategic site. We dispute this allocation and suggest that this was designed to reduce the impact on Abingdon and increase the impact on the smaller communities of Wantage and Grove. This allocation should be revisited as part of the process of developing the local plan. The current allocation locates development where no employment exists and where the scale of the development is out of all proportion with the current scale of occupation.*

### Core Policy 18: Affordable Housing

Core Policy 18 states that “forty per cent affordable housing with a tenure mix of 75 per cent social/affordable rented and 25 per cent intermediate housing will be sought on all sites capable of a net gain of three or more dwellings subject to the viability of development. Any affordable housing provided should:

- be of a size and type which meets the requirements of those in housing need, and
- be indistinguishable in appearance from the market housing and distributed evenly across the site.”

#### Our response:

*We do need more affordable homes. We all know people who need help getting onto the housing ladder and part ownership or help with deposits will help these people. We have received several comments about the lack of enough modestly-priced homes near to Milton Park that newly-graduated staff could buy or rent. There used to be accommodation on site at Harwell Campus, hostels for single people, and well over 200 inexpensive homes for rent. This allowed young people to save for a deposit on homes of their own, and many hundreds of people made use of this opportunity.*

*In contrast, the current Chilton Fields development appears to feature few affordable homes - significantly fewer than the 40% target figure. The areas of the former housing at Harwell Campus remain undeveloped and there is room for several hundred modestly-priced properties. Such a development would fulfil the need expressed by our members and facilitate staff recruitment, but if*



*combined with a reduction in target dwellings for Wantage and Grove, would also result in reduced peak traffic density at the most congested local choke points.*

*We do need some more social housing but there were less than 100 people on the housing list with Wantage postcodes earlier in the year and only 1200 on the housing list for the entire Vale so we don't want to be the dumping ground for the County. We believe that more support through part ownership and help with deposits is key to getting people on to the housing ladder and promoting the level of home ownership that the character of the Vale requires. We do believe that the percentage of rented versus purchased should be reviewed to ensure that it reflects the character of each of the strategic development sites, but we support the core policy of a minimum requirement for affordable/social housing and believe that this should be scattered to avoid the formation of the types of ghettos seen in some parts of the country.*

*We don't want the new estates to be like St Mary's where 195 of the 234 homes are affordable homes or social housing. This is not the pepper-pot approach that the Vale seems to talk about.*

### Core Policy 19: Rural Exception Sites

Core Policy 18 states that "affordable housing schemes will be permitted within and on the edges of villages, on sites that would not otherwise be acceptable for housing development, if all of the criteria can be met."

#### Our response:

*We recognise that in the villages the housing policy in recent times has reduced the amount of rental property available in some rural locations and support the LPP1 when it states that "secure arrangements will be made to ensure that all the houses will be occupied by local people in need of affordable housing and that the benefits of the low cost provision will remain available to local people in the long term."*

*We approve the guidance in the LPP1 which states that "Schemes approved under Core Policy 19 must be for genuinely affordable homes designed to meet a specific local need. The homes must be affordable to people who are unable to rent or buy a property on the open market. In this context, local need will be defined as people living or working in the particular village, where the scheme is located, or in an adjacent village."*

*We believe that this policy is equally applicable to the village of Grove, and to the small town of Wantage.*



## Spatial Vision and Strategic Objectives

As the LPP1 states the Vale of White Horse district consists of a network of historic market towns and other settlements set in a diverse and attractive rural landscape.

### Our response:

*The district benefits from road connections to nearby urban centres and beyond, and houses an internationally significant cluster of research and innovation businesses, but this connectivity is close to capacity.*

## Core Policy 2: Settlement Hierarchy

The Settlement Hierarchy identifies and classifies settlements within the Vale and provides a guide to where development may be sustainable according to the role and function of the settlement.

### Our response:

*This settlement hierarchy makes no mention of employment but this is an underlying requirement for the prosperity of the Vale. We believe that the settlement hierarchy should include the employment capacity of a settlement in the classification to ensure that development reflects sustainability through the proximity of employment opportunities for the residents.*

*The district benefits from many opportunities, particularly those associated with the potential for growth and job creation. However, the district also faces a series of challenges to realise this potential. We also have to recognise that bringing innovation businesses into the area does not guarantee new jobs for the residents. Many of the internationally renowned scientists will not want to live on large new estates and will continue to commute to the Science Vale from outside the area (usually from outside Oxfordshire). Well-known names do not guarantee large scale employment. When the European Space agency moved here they reputedly created only 3 new jobs!*

The LPP1 states that new development will respect the local character of the Vale, protecting its outstanding and distinctive natural and built environment and continue to preserve its important heritage. High environmental standards will have been achieved through new development, which will also be more resilient to the likely impacts of climate change.

*Building large new developments on the edges of Wantage and Grove will not achieve this.*

*We recognise that growth is required and that the Airfield is a brown field site but it is also subject to flooding and will require significant work to ensure that not only does the new development not flood but that the impact on existing land ensures that current run-off from the site is reduced. There are already problems near Letcombe Brook where properties regularly flood which is ignored by Thames Water and the District Council. These need to be resolved before the Vale encourages developers to build more properties in this impervious clay soil which is prone to prompt flooding during very wet weather.*

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*Conversely the Crab Hill and Chain Hill sites both abut AONB and are also on slopes where the run-off already runs over roads and pavements. Once again nothing is done by Thames Water and the District Council to alleviate this at the moment and any development on these sites needs to remedy existing problems as well as not cause future ones.*

*The plan implies that all developments will match the current rural character of the area and will not create huge urban landscapes but Core Policy 20 fits very well with a recent article in the Independent in which Nick Boles (Housing Minister) was quoted as arguing that developers stuff as many homes as they can onto a site and, in an attempt to make the properties affordable, skimp on room size, architectural features, materials and landscape design.*

*Surveys show that the size of the rooms is one of the top three issues people look for when moving home. The factors which put people off buying new homes are the small rooms and lack of outside space.*

*New figures show that the average new-build home is 818ft<sup>2</sup> including kitchen and bathroom and the typical 1 bed flat is less than 500ft<sup>2</sup>.*

*The local plan talks about “New housing should provide good quality, attractive and acceptable living environments. Density is an important consideration in delivering these high quality environments.” but it goes on to say that “Land is a finite resource and should be used efficiently”*

### Core Policy 20: Density

Core Policy 20 states that “On all new housing developments a minimum density of 30 dwellings per hectare (net) will be required unless specific local circumstances indicate that this would have an adverse effect on the character of the area, highway safety or neighbouring amenities. This is a minimum and higher densities should be sought in locations with good access to services and public transport”, but the next paragraph states that: “It is also important to provide the type of housing needed to attract people to live and work locally, built to a size and standard that supports a good quality of life.”

### Our response:

*Cherbury Green and Charlton Heights are both housing estates that reflect an urban style but still have densities less than the 30 dwellings per hectare stated in the policy. The Southern part of the vale (the rural area around Wantage and the surrounding villages of Ardington, Denchworth, East Challow, East Hanney, East Hendred, East Lockinge, Ginge, Grove, Letcombe Bassett, Letcombe Regis, West Challow, West Hanney, West Hendred and West Lockinge) should allow lower density if the character of the area and the housing needs require this.*

*We believe that this Core Policy 20 is too restrictive and that a lower minimum density of housing should be considered. We live in a rural area and believe that open space and space to grow vegetables and park the cars necessary to live in the rural areas of the Vale is a minimum requirement.*



*Two parking spaces should be provided as a minimum for any home with children as both parents are expected to work. Sufficient garden space to grow vegetables and fruit (60ft<sup>2</sup> is usually considered to be a minimum) would also reduce the pressure on allotments.*

*Secure space to allow children to play should be a requirement on all properties. It is no longer considered acceptable to allow children to play outside on the streets and therefore space to play in a safe environment should be a basic right for all children living in the Vale.*

*We can't find any guidelines on the minimum space requirements for the internal and external areas of a dwelling in the local plan but would find this useful to ensure that the aspiration of "good quality, attractive and acceptable living environments" can be met.*

### Core Policy 37: Design

The policy states that "All proposals for new development will be expected to be of high quality design, such that the layout, scale, mass, height, detailing, materials, landscaping and relationship to context make a positive contribution to the character of the locality."

#### Our response:

*As the Royal institute of British Architects states in their latest report on improving housing quality:*

*"with the exception of a few individuals and a few councils, planning authorities lack the confidence or resources to impose design criteria or codes. They are also concerned about rejecting schemes purely on a design basis, as they are uncertain how this will be judged if the application proceeds to appeal."*

*Although we believe that this applies to the Vale at the moment, we believe that the LPP1 should impose design criteria for both the interior and exterior of housing if the aspirations in the local plan are to be achieved.*

*If we get all these new little boxes squeezed into large developments then we won't live in a beautiful rural district anymore and the Vale won't be a desirable place to live.*

### Core Policy 38: The Historic Environment

This policy states that "Development should sustain and enhance the historic environment, both above and below ground, and not detract from the significance of heritage assets or their settings. Development should make a positive contribution to the local character and distinctiveness of the historic environment".

As the LPP1 states "Wantage is the second largest settlement in the district and is a shopping and service centre for a large rural catchment. Its attractive market place and downland setting are essential components of its character. The North Wessex Downs Area of Outstanding Natural Beauty (AONB) extends to the southern edge of the town."



## Our response:

*This attractive setting will not remain if large developments take place butting up to AONB land and on some of the quality agricultural land in the area.*

The LPP1 continues “The nearby large village of Grove is the third largest settlement in the district. However, previous housing permissions in the village, granted on appeal, have not delivered the range and quality of services a settlement of this size would normally expect. It is therefore essential that growth is planned to deliver necessary improvements for the village.”

*This statement must include improvements to drainage, commercial and leisure infrastructure and the cultural facilities needed in what will be a village with a population of over 13,000 people.*

*13,000 people in Grove will be similar in size to Kidlington which has about 50 shops, banks and building societies, a public library, a large village hall and a weekly market. There are seven public houses, two cafes, and four restaurants. At the current time, Grove has two community halls, two public houses, two restaurants, a fish and chip shop and a coffee shop, a health practice and a dentist, a library, five places of worship, 23 shops and a bank.*

The LPP1 talks about "Focusing sustainable growth within the Science Vale UK area by: delivering a comprehensive package of strategic and local infrastructure and services alongside the housing and employment growth to ensure a balanced and sustainable mix of development. This will include significant investment in new roads and public transport to enable good access between Wantage and Grove, Harwell Oxford, Milton Park and Didcot."

The South East Vale Sub-Area Strategy states that any growth in the area must be "carefully coordinated to ensure service and infrastructure provision closely matches the needs".

*We do not believe that the proposed 5,500 homes in Wantage and Grove meet this criterion. Jobs will mainly be 10 miles away and public transport will not be sufficient to provide a viable alternative to the private car. No enhancements are planned for the A417 (except for minor improvements to Featherbed Lane and the Rowstock junction) sufficient to enable it to cope with additional buses, cyclists and 8,500 additional cars.*

*A number of consultations have been held over a number of years as the Local Plan has been developed, but these have all been based on the assumption that the approach would still need to follow the requirements set out in the South East Plan.*

*Further consultation was done in 2010 which did not comment on the spatial strategy directly, but did recommend an additional strategic housing site at Harwell Oxford Campus. This site did have a larger housing presence in the past and we believe that a substantially greater number of new homes should be built on the former housing areas where drainage and other services have existed in the past. The Harwell Campus and the related development being built at Chilton will create a critical mass for services and do meet the criteria for locating “employment and housing growth in a way which reduces the need to travel by car and encourages more sustainable modes of travel”.*

*In 2011/2012 an internal review process was conducted and included a workshop for the Vale's elected district councillors. This review mainly focussed on refining the Vale overall housing target*



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*but proposed some refinements to the spatial strategy, mainly reducing the number of houses proposed for Abingdon and increasing the number for Wantage and Grove. As far as we know this was not based on any new evidence.*

*The spatial strategy does make strong statements about improvements to transport but in practice, the only new roads in the proposals to affect Wantage and Grove will be the by-passes through the new developments (if the northern by-pass is included in the planning application for the Airfield development). The only public transport will be:*

*a) an Interlink Route to connect Wantage and Grove with Milton Park, Didcot Parkway and the Orchard Centre, and*

*b) an hourly, peak time only service linking Wantage and Grove with Harwell Oxford.*



## Spatial Strategy

The Spatial Strategy makes provision for growth of around 14,300 new jobs, including 143 hectares of employment land, and at least 13,294 new homes during the plan period from 2006 to 2029.

### **Our response:**

*We would be interested to know what new jobs and new homes have been achieved in the period from 2006 to 2013 and what impact the Vale feels that these figures will have on these stated aspirations.*

*We believe that these figures were prepared before the recession of the last 5 years and in an economic environment which was optimistic and expected the growth of the previous ten years to continue indefinitely. We now know that this is not the case and that the current low growth economic pattern is likely to continue for some time. This should be taken into account when the plans are reviewed and the new lower figures produced should reflect the actual growth since 2006 and the lower expected growth rate for the future.*

## Core Policy 4: Meeting Business and Employment Needs

This policy states that 143 hectares of land is identified for future employment development on the following strategic sites and saved Vale Local Plan 2011 allocations. These strategic sites are:

- Milton Park – 28 hectares (Saved Local Plan 2011 allocation - expanded)
- Harwell Oxford Campus – 64 hectares (Saved Local Plan 2011 allocation – reduced to allow housing)
- Monks Farm – 6 hectares (New mixed use strategic allocation)
- South of Park Road, Faringdon – 3 hectares (New mixed use strategic allocation)
- Didcot A – 29 hectares (Identified future potential supply, the size of this site could also provide additional land over and above the identified requirement, in the latter stages of the plan period.)
- Grove Technology Park – 5.4 hectares (built and in use)
- Land adjacent to A420 – 4.2 hectares
- Wootton Business Park – 1.5 hectares
- Other minor allocations (none larger than 1 hectare) – 1.9 hectares.

### **Our response:**

*Given that Grove Technology Park, Milton Park and Harwell Oxford Campus are already in use, it would help to have a status check as part of the new Local Plan which makes clear which sites are already providing employment and at what levels and which acreage is identified for future employment development and approximately how many jobs will it sustain.*



## Core Policy 21: Housing Mix

This policy states that “An appropriate mix of dwelling types and sizes to meet the needs of current and future households will be sought on all new residential developments. This should be in accordance with the council’s current Housing Needs Assessment unless robust evidence identifies the need for a degree of flexibility by establishing a:

- different mix based on the need of a specific settlement, or
- variation of mix is necessary due to viability constraints.”

### Our response:

*We agree that there is a need to provide housing in the district that reflects the needs of an ageing population and a growth in smaller households but it must be recognised that smaller households do not necessarily mean flats with no outside space. We are a rural area and people tend to move to a rural location to gain space (inside the property as well as outside space) not to lose it.*

## Core Policy 22: Meeting the needs of Gypsies, Travellers and Travelling Show People

This policy states that “The council will enable or provide for 13 pitches for gypsy and travellers within the plan period to 2029.”

### Our response:

*We recognise that the Council recently granted full planning permission for eight gypsy and traveller pitches on a site adjacent to Watchfield. This site provides 11 years of supply against the locally set target of 13 pitches to 2029.*

*We will wait for future consultation on the location of the remaining 5 pitches.*



## Building healthy and sustainable communities

The LPP1 states that the Vale population in 2011 was 121,000, a rise of 4.6 per cent since 2001.

### Our response:

*Projections for future rises in population, prepared by Oxfordshire County Council, show the total population for the Vale is expected to reach 138,743 by 2026.*

*The most recent figures from the government state that in 2011 the population of the Vale was 118,932 (5.62% growth since 2001) so we aren't sure where your figures come from. The figures for 2021 project a growth rate for the Vale of 7.78% to a total population of 127,327. Adding a further 5 years at the same growth rate suggest a total population of 131,525 by 2026.*

*Aligning targets with Census years would make them much easier to align with Government statistics.*

*The LPP1 states that there were about 50,000 homes in the district in 2011. Average household size fell from 2.46 persons per dwelling in 2001 to 2.42 in 2011. The government statistics show 49,781 households in 2011 (we know the difference is only 219 households but if these were built near you it would matter).*

## Core Policy 5: Providing Supporting Infrastructure and Services

This policy states that “all new development will be required to provide, in a timely manner, for the on-site and, where appropriate, off-site infrastructure requirements necessary for the development to be sustainably accommodated”.

The plan states that “Infrastructure delivery is important to ensure new development is sustainable. New services and facilities should be planned to meet the demand created by new development and be delivered at appropriate timescales. This will ensure that the needs of both the existing community and future residents are provided for. We will therefore only grant planning permission for new development once the delivery of necessary infrastructure within appropriate timescales has been secured.”

### Our response:

*Where new services are to be delivered off-site – health services, Library services etc. land should be protected for these facilities in the plan.*

*We believe that this policy should take account of the poor state of the infrastructure in the Vale as previous developments have been allowed without providing the required infrastructure and a lack of investment in roads, schools and leisure facilities in the past has meant that many of the current facilities are at or exceed capacity.*

*If the existing facilities cannot be brought up to a current standard, development should be limited until this can be achieved. If it is true that infrastructure has been traditionally provided or funded by developers through legal agreements under Section 106 of the Town and Country Planning Act*



(1990), then the money from previous developments should be available to improve or renew current facilities.

The LPP1 states that most of the Vale's community facilities and services, such as libraries, secondary schools, health centres and indoor leisure centres are located in Abingdon on Thames, Botley, Faringdon and Wantage. There are small hospitals in Abingdon on Thames and Wantage, and further and higher education at Abingdon on Thames, Botley, Kennington and Watchfield.

### **Our response:**

*The LPP1 makes no comment on the available capacity or future plans for these facilities. This is important to the health and sustainability of the communities.*

*For example: Wantage Leisure Centre is estimated to be running at 100% full, at 810 visits per week in the peak period and there is no capacity to cater for any additional demand. 80% is usually considered full. The other leisure centres (Abingdon and Faringdon) are running about 50% full.*

The LPP1 states that "The historic market town of Wantage and the nearby large village of Grove are separate settlements with their own unique character and identity, which need to be protected. The settlements also have a strong functional relationship, with many shared services, including for health, education and leisure. It is therefore important that any growth in the area is carefully coordinated to ensure service and infrastructure provision closely matches the needs of the two communities."

### **Our response:**

*Given that most of the existing services and infrastructure are already close to or exceed capacity it is important that the plan ensures that the timing and delivery of services is appropriate and matches the need, not that it is built to an economic timetable derived by developers.*

## **Core Policy 23: Accommodating Current and Future Needs of the Ageing Population**

This policy states that "in order to meet the needs of current and future households in the context of an ageing population the following requirements will be sought, where appropriate, subject to the viability of provision on each site:

- all new homes, excluding flats above ground level, should be built to current Lifetime Homes standards
- residential dwelling houses designed for older people (with or without care) should be provided in the strategic site allocations in Local Plan 2029 Part 1 and other suitable locations in accordance with the spatial strategy
- where residential dwelling houses for older people (with or without care) are provided, it should be on a mixed-tenure basis in accordance with the requirements in Core Policy 18 Affordable Housing.
- other forms of specialist accommodation for older people will also be supported in suitable locations as long as they accord with other policies within the Development Plan, and



- where standards that would apply to general housing have been relaxed in response to the special needs of the occupiers of the scheme the occupancy will be limited to accord with the nature of the scheme.”

The LPP1 also state that “in order to address the needs of the ageing population some homes should be specifically designed to meet the needs of older people. This includes housing for active older people that enables them to retain a level of independence but with access to the specific levels of care where they need it, as well as residential care homes and nursing homes.”

“Other forms of specialist accommodation for older people (for example residential care and nursing homes) will also be supported in suitable locations.”

### **Our response:**

*The Council proposes to set targets for residential dwelling houses designed for older people. This may be a percentage based target for on-site delivery or a specific figure to be delivered over the plan period.*

*We question the inter-relationship between the target for social and affordable homes and any target for residential dwelling homes specifically designed for older people. We would debate the needs for targets and would encourage discussion on this topic before targets are imposed.*

## **Supporting economic prosperity**

The Vale benefits from a very strong knowledge-based economy and has almost 5,400 businesses located in the district. The Vale’s workforce is highly skilled with a higher than average proportion of managers, professionals and associate professionals. Levels of unemployment in the Vale are also relatively low at less than half the national average.

### **Our response:**

*Science Vale UK includes at least 5 of the 55 Science Parks in the UK and two of 24 Enterprise Zones. This provides opportunities for business growth but does not guarantee it. We will continue to compete with other parts of the UK and other parts of the world and should recognise that the economic environment is no longer one of guaranteed growth as it was in the late 1990’s and early 2000’s.*

*The LPP1 states that one of the key challenges in the plan is supporting the economy of the towns and rural areas and providing a range of employment opportunities close to where people live. This is particularly relevant at Faringdon, Grove and Wantage, as the general focus of employment opportunities within the Vale is at the Enterprise Zone sites close to the eastern boundary of the district.*



## Core Policy 24: New Employment Development on Unallocated Sites

This Policy states: “Proposals for new employment development (use classes B1, B2 or B8) will be supported on unallocated sites provided that:

- the proposals will not cause unacceptable harm to the amenities of nearby residents and occupiers
- safe site access can be provided for pedestrians and cyclists and for all types of vehicles likely to visit the sites and the proposals include measures to promote the use of sustainable modes of transport where possible
- the scale nature and appearance of the employment does not harm the character of the area and respects the local townscape and landscape character, and
- it can be demonstrated that the proposal will benefit the local economy and will not undermine the delivery of the strategic employment allocations.

In the rural areas the preference is for the re-use, conversion or adaptation of suitable existing buildings.”

### Our response:

*We agree with this policy and would encourage any proposals which fall within this policy and provide employment to the residents of Wantage and Grove.*

*We do, however, question the last bullet “the proposal will benefit the local economy and will not undermine the delivery of the strategic employment allocations”. How could proposals which benefit the local economy undermine the delivery of strategic employment allocations?*

## Core Policy 25: Change of Use of Existing Employment Land and Premises

Core policy 25 states: “The strategic employment sites, as listed in the sub-area strategies, form part of the district’s long term reserve for employment land and will be safeguarded for employment (B1, B2 and B8) uses. Alternative uses will be considered if they provide ancillary supporting services or meet a need identified through the local plan review process, or exceptionally where a reassessment of the district wide 2013 Employment Land Review demonstrates that these sites are no longer needed over the full plan period.

Elsewhere in the district, applications for the change of use of land or premises that are currently, or were last, used for employment purposes will need to demonstrate that at least one of the following criteria is met:

- there is no reasonable prospect of the land or premises being used for employment purposes
- the land or premises is unsuitable for business use on grounds of amenity, environmental or highway safety issues
- the land or premises has no long term or strategic requirement to remain in employment use, or



- the proposed use will be ancillary to the use of the land or premises for employment purposes.”

## **Our response:**

*This policy may affect the land being released in Wantage through the closure of the Police station and the Magistrates Court. We believe that this land should be protected for the ‘main town centre uses’ referred to in the policy which include retail, leisure, entertainment facilities, more intensive sport and recreation uses, offices, and arts, culture and tourism development including being used to extend the car park to encourage footfall in the town centre. No other uses should be allowed.*

## **Core Policy 26: Further and Higher Education**

This policy states that “The council will support the development and enhancement of further and higher education facilities to help support the local economy and to ensure the local labour force is equipped to take advantage of the opportunities likely to arise in the future.”

## **Our response:**

*We support this policy.*

## **Core Policy 27: Tourism Related Development**

This policy encourages new tourism related development for leisure and business purposes. It states that “Tourism proposals will be supported within the built-up areas of the Market Towns and Local Service Centres [such as Wantage and Grove] for larger scale tourism developments including conference facilities, museums, heritage centres, hotels, guest houses and associated tourist facilities.”

## **Our response:**

*We support this policy if it increases the viability and vitality of the Wantage and Grove area.*

## **Core Policy 28: Retailing and other Main Town Centre Uses**

One of the Strategic Objectives of LPP1 is to maintain and enhance the vitality and viability of the existing centres such as Wantage and Grove. Core Policy 28 indicates that new retail development will be directed towards these existing centres. It states that the “Market Towns and Local Service Centres defined in the settlement hierarchy are the preferred locations for larger scale development or redevelopment for retailing and other main town centre uses”.

## **Our response:**

*We support this policy and query why the centres of Abingdon and Botley are the subject of separate Core Policies but Wantage is ignored. According to the Retail and Town Centre Study included with the Local Plan, Abingdon and Wantage town centres have a similar number of units but 28 units in Wantage are currently empty.*



## Wantage and Grove Campaign Group



The National Planning Policy Framework states: “When planning for growth in their town centres, local planning authorities should allocate a range of suitable sites to meet the scale and type of retail development needed. It is important that the needs for retail and other main town centre uses are met in full and not compromised by limited site availability.”

*We have a great museum in Wantage which is getting better known but need more things to attract people. We need to reduce the fragmentation of the Centre caused by the Sainsbury development including increasing the vitality of Mill Street, Alfred Street, Church Street and Newbury Street. All new development of the Magistrates Court and the Police Station should be commercial development or more parking. There isn't enough parking on market days at the moment and we do want to encourage more trade and more local employment.*

*The Plan talks about rejuvenating Botley and Abingdon but doesn't mention rejuvenating Wantage!*



Science Vale UK Area



## Supporting sustainable transport and accessibility

The LPP1 states that “the main transport requirements of national policy are to reduce the need to travel, the need to promote sustainable modes of travel and improving accessibility. A key factor is therefore the location of all forms of development.”

### Our response:

As the map in the Plan (reproduced above) shows, the 800 people who work on Grove Technology Park and those who work at Williams F1 are the only people who could potentially walk to work in Grove or Wantage other than those working in local services, such as schools, shops or health centres. As far as we are aware, none of the companies on Grove Technology Park, MacDermid or Williams F1 are planning significant growth in employment within the life of the plan. All other areas of employment are to the east and the only access between Farringdon, Wantage and Grove and the employment hubs is along the A417, 8-10 miles away.

This does not meet the sustainability criteria.

## Core Policy 29: Promoting Sustainable Transport and Accessibility

The Policy states that: “the council will work with Oxfordshire County Council and others to:

- actively seek to deliver the transport infrastructure and measures which improve movement in the Science Vale UK area as identified in the County Council’s Local Transport Plan’s (LTP), Science Vale UK Area Strategy and the Science Vale UK Integrated Transport Package, in partnership with South Oxfordshire District Council



- actively seek to ensure that the impacts of new development on the strategic and local road network are adequately mitigated
- support measures identified in Oxfordshire County Council's LTP including the relevant local area strategies for the district
- support improvements for accessing Oxford
- ensure that transport improvements are designed to minimise effects on the amenities of the surrounding area
- encourage the use of sustainable modes of transport and support measures that enable a modal shift to public transport, cycling and walking in the district
- promote and support improvements to the transport network that increase safety, improve air quality and/or make our towns and villages more attractive
- ensure adequate parking is delivered on new developments in accordance with Oxfordshire County Council's published standards
- all developments that generate significant amounts of movement must be supported by an appropriate transport assessment or statement and travel plan that is agreed by Oxfordshire County Council, and
- promote electronic communications allowing businesses and residents to operate throughout the district and to provide services and information that reduce the need to travel."

### **Our response:**

*As the LPP1 states the Vale of White Horse is well situated in relation to the strategic transport network. The A34 trunk road runs through the district close to its eastern edge. This provides access between the M4 to the south, and the M40 to the north, and to Oxford. The A420 and A417 roads also run across the district, providing links to Swindon in the west and Didcot in the east. This can be a curse as well as a blessing.*

*Unfortunately the M4 has a reputation for accidents and hold-ups and is not a reliable access route, the A34 is close to capacity and there are no plans to enhance it. When either of these roads is blocked, the roads through the Vale become the preferred route and this can seriously affect the usage on these rural A and B roads.*

*As the LPP1 states congestion on the A34 truck road and its interchanges presents challenges. It is important the road network operates safely and efficiently for the economic success of the district to be maximised and the quality of life of residents to be maintained. The plan should therefore consider the impacts of growth on this strategic trunk road. It goes on to focus on Abingdon and Botley but does not mention the impact on the A417, A338 and the network of country roads which link them to the A34 and M4. These roads are close to capacity. Even now:*

- *buses refuse to go into some of the villages because the problems of getting back out onto the A road plays havoc with their timetables;*
- *it is impossible to overtake a cyclist if there is traffic in both directions;*



- *when a bus stops to pick up passengers the traffic builds up behind the bus because it can't get past;*
- *any problems with flooding or blockages on the A34 have a very significant impact on the volume of traffic;*
- *people in the villages off the road may wait up to 20 mins for a gap in the traffic.*

*The Vale District Council did a survey of the people living in new homes built in the Vale between 2001 and 2007. This covered 761 households and proved that most people drive everywhere. These households had over 1,100 cars. There were 1,221 people in work and more than 900 cars were used to drive to work.*

*If this profile continues with the developments in the LPP1, then the 5,500 houses proposed for Wantage and Grove would mean that we need jobs for 9,314 people (in addition to the jobs required for houses in other parts of the Vale and the County) and can expect at least 7,000 people driving to work.*

*In the results of the survey there were also 360 people in education. So for 5,500 houses that might mean 2,750 people who also need to travel to schools and colleges.*

*If we wanted these people to use public transport then we would need about 200 buses to take them to work, school or college. When we asked an officer from the Highways Department if they had considered this, they said it was totally unrealistic and that people would drive.*

*Decent cycle ways would help but there will always be only a limited number of people who choose to cycle to Harwell, Milton Park, Didcot or even Abingdon so it won't have a huge impact on the numbers.*

*Although some of the strategic developments will fund enhancements to some pinch-points on these roads, the need for separate cycle ways and laybys for bus stops has not been considered.*

The LPP1 states that the District Council "will seek, in partnership with Oxfordshire County Council and other stakeholders, to promote cycling and walking through improving the existing network, providing new routes both generally and in association with new development and providing information on the routes and other measures to promote these forms of travel."

*This needs to include new cycle ways from Wantage and Grove to Harwell Campus and to Milton Park which do not involve stiles, travelling through churchyards, or travelling on the busy roads in the area.*

*If one of the key opportunities is using the LPP1 to locate employment and housing growth in a way which reduces the need to travel by car and encourages more sustainable modes of travel, then placing a large proportion of the housing development in Wantage and Grove where the only practical mode of transport is the car is not a viable answer.*

*The district wide transport assessment does acknowledge that the delivery of new housing through this strategy will place increased pressure on the road network at certain locations within the district.*



*Transport Assessments, to accompany planning applications for new development, will determine the precise nature of the impacts on local road sections. The plan states that mitigation measures will be required to address any impacts identified. We believe that this will not happen.*

*We believe that the underlying figures which support the transport package are wrong. The Evaluation of Transport Impact Stage One Technical Note 2013 in Table 1 – Assumed residential developments, excludes the development at Grove Airfield. Therefore we believe that the evaluation is based on figures which exclude all traffic from this development. This is therefore not adequate.*

*Also none of the validation checks were performed on the A417 between the point at which the Wantage Relief road will join the A417 and the end of Featherbed Lane. This will be the busiest stretch of road and is ignored in this study.*

There are two paragraphs on car parking in the LPP1 yet cars will be the key means of transport across the rural areas of the Vale and will be the main (if not only) mode of home to office transport for a large part of the population. The document states that “The Oxfordshire County Council (OCC) car parking standards will be applied across the district. These standards take account of the objective to increase the use of sustainable modes of travel in the context of available alternatives. These standards are reviewed regularly to take account of local issues.”

*We believe that these will not be sufficient for most developments in the Vale. The government is encouraging all adults to work – even those with small children. Schools can be 2-3 miles from developments and with both parents working two cars are essential for most households. Therefore two parking spaces should be the minimum requirement for any property designed for two people (even one bedroom properties). This exceeds the standards set by OCC.*

According to the LPP1, “the internet provides an opportunity to reduce the need to travel. It increasingly means that location is less important for businesses and enables increased home-working.”

*If this is true then people do not need to relocate to the area to work in the Enterprise Zones – their homes could be anywhere in the world.*

*Yet businesses are increasingly moving back from home working and encouraging face-to-face co-operation, and scientific studies are difficult to achieve without being on-site to perform the experiments. The case for significant home working is yet to be proven for many industries and the case for businesses working in the Vale should be proven before the statistics are relied on to reduce the projected need for transport improvements.*



## Protecting the environment and responding to climate change

As the LPP1 states the Vale benefits from an extremely attractive and highly valued landscape and this is one of the reasons it is such a popular place for people to live and visit. Of special note are the chalk downlands in the south of the district, which are designated as part of the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The wooded Corallian Ridge crosses north of the district, its scarp facing north towards the Cotswolds across the upper Thames Valley. This area is afforded local protection and at its eastern end forms an important part of the landscape setting of the City of Oxford, and is designated as part of the Oxford Green Belt. The Vale also contains 23 Sites of Special Scientific Interest (SSSI), two of which, at Cothill Fen and Hackpen Hill, are also designated European Special Areas of Conservation (SAC).

### Our response:

*Filling the remaining area with new build is not going to help the attractive and highly valued landscape.*

*The district has the highest total greenhouse gas emissions in the County, and these are above the national average. Emissions from road transport are higher than any other district in the South East. The Local Plan calls for 5,500 new homes in Wantage and Grove but 95% of additional jobs will be 8-10 miles away. Planned bus services cannot provide the necessary transport and therefore cars would be used by most people. However, the Local Plan has the objective of a Low Carbon Vale and making sure that land allocated for new development is located near to jobs and services, and can be accessed by public transport, cycling or walking.*

*How can the planned housing developments be consistent with this objective?*

*Whilst the Downs are mostly chalk and self-draining into aquifers beneath, the lower slopes of the Ridgeway and the Vale itself comprise impervious clay soil, across which surface water flows towards the principle waterways. Communities between the Ridgeway and the Ock, historically known as the Island Villages, are prone to prompt flooding during very wet weather, such as occurred in July 2007. Early editions of Ordnance Survey maps show the whole region as marshy, and large-scale housing development in the area has long been regarded as unwise. In recent years homes built in the area have subsequently been found to be flood-prone, and the government is funding flood-defence schemes to reduce the risk. Such measures may be undermined if inadequate drainage provision is provided for the planned new homes, especially those located in areas that act as retention basins.*

*In addition to areas defined as flood plains, other parts of the Vale, such as Grove Airfield, act as temporary retention basins, holding back large volumes of surface water that would otherwise flow via neighbouring villages into the Ock. In contemplating locations for development, it should be recognised that nearby areas may become more flood-prone, especially if development encroaches on such retention basins.*

*It has been announced in the press recently that the agreement or understanding between the Government and Home Insurers on the cost of home insurance is to end this summer. This comes in the wake of local people discovering that flood insurance premiums have shot up after the events of*



summer 2007. Hence it is likely that flood insurance in some areas (probably including the Vale) will rise even further making the area more unaffordable.

*These points are not mentioned in the key challenges and opportunities in this section of the LPP1.*

In Chapter 3 some of the key outcomes are to:

- Prioritise development to where the need to travel by car can be minimised
- Avoid development in flood zones 2 and 3, ensure new developments do not increase the risk of flooding elsewhere and promote the use of Sustainable Urban Drainage Systems,
- Minimise and if possible reduce our carbon footprint by reducing the need to travel, promoting more sustainable forms of transport and promoting opportunities to meet energy efficiency standards for buildings and encouraging decentralised, low carbon or renewable energy,
- Support the appropriate reuse of previously developed sites
- Ensure new development makes a positive contribution to the local distinctiveness and character of the area
- Preserve or enhance the district's designated and non-designated heritage assets and their settings.

### **Our response:**

*We believe that the proposed scale of development for Wantage and Grove are counter to these outcomes and should be reduced to a sustainable level.*

*Furthermore; we understand that several of the strategic development sites and potentially some of the smaller sites are crossed by overhead power line. The Council should impose a condition prohibiting development until such time as agreement has been reached as to how the overhead lines can be accommodated on the sites.*

### **Core Policy 30: Sustainable Design and Construction**

The policy states that: "All new development, including building conversions, refurbishments and extensions, will be required to incorporate climate change adaptation and design measures to combat the effects of changing weather patterns. Wherever practicable the following measures should be used, and their application to the development outlined in the Design and Access Statement:

- planting, shading and advanced glazing systems to reduce solar heat gain
- materials to prevent penetration of heat, including use of cool building materials and green roofs and walls
- increasing natural ventilation and removing heat using fresh air
- orientating windows of habitable rooms within 30 degrees of south and utilising southern slopes, and
- locating windows at heights that maximise heating from lower sun angles during the winter.



All new residential development will meet a minimum standard of Code for Sustainable Homes Level 4 in full. Achieving higher Code levels in the 'Water' and 'Surface Water Run-off' categories will be particularly encouraged."

### **Our response:**

*We believe that the VWHDC should be aiming to achieve much higher standards for new housing in the Vale, especially as reducing energy consumption from the outset ensures savings over the lifetime of the buildings and ensures lifetime savings for the occupants. The Government will soon be setting the revised standards for 2013 but we firmly believe that the Vale should be seeking to exceed these with the aim of achieving "zero carbon" status for new housing at the earliest opportunity (it will become mandatory from 2016).*

*We need to ensure that the developments proceed in the context of the national target to reduce greenhouse gas emissions by 80% by 2050 and all that implies for housing, transport, local employment and sustainability.*

*The legally binding 80% target is enshrined in the Climate Change Act 2008, with an intermediate target of 34% reduction relative to 1990 by 2020 and 50% by 2025. The National Planning Policy Framework requires that development is implemented in line with the requirements of the Act. To achieve such reductions requires a fundamental rethink of the town planning, such that housing proceeds in tandem with local job creation, transport infrastructure reduces journeys and moves away from carbon-intensive options and developments achieve the highest standards of energy and environmental sustainability. "Wherever practicable" is not good enough.*

*Also given water shortages in 2012 and floods since 2007, the LPP1 should seek a high standard of water efficiency in new buildings on major development sites through such measures as recycling 'grey' water that has already been used and harvesting rainwater for use in the building and gardens.*

### **Core Policy 31: Renewable Energy**

This policy states that the "council encourages schemes for renewable and low carbon energy generation. Planning applications for renewable and low carbon energy generation will be supported where they do not unacceptably impact on:

- landscape, both designated AONB and locally valued
- biodiversity including protected habitats and species and Conservation Target Areas
- historic environment both designated and non designated assets
- the visual amenity and openness of the Green Belt
- local residential amenity, and
- traffic generation."

### **Our response:**

*The levels of renewable energy generation in the Vale are decreasing so exactly what does the LPP1 mean when it states that "to enable the Vale to find sources of renewable energy and to contribute*





towards the government's target, the council will support schemes for renewable energy where they are suitable in all other respects."?

## Core Policy 32: Flood Risk

The policy states that "With regard to flood risk, the sequential approach will be strictly applied across the district, in accordance with national guidance. Development within areas of flood risk from any source of flooding, including areas with a history of groundwater or surface water flooding, will only be accepted if it is demonstrated that it is appropriate at that location, and that there are no suitable and available alternative sites at a lower flood risk."

### Our response:

*As we know most of the area around Wantage and Grove which is designated for strategic development is impervious clay soil which is prone to prompt flooding during very wet weather. For the Airfield site, the last public exhibition showed a total surface water retention capacity of just under 20,000cu metres for a site area of 130 hectares. Thus the capacity per unit area is 156 cu m/ha. For the Crab Hill proposal, the retention capacity was 28,130cu m for a site area of 95 ha. This gives a capacity per unit area of 296cum/ha, which is almost twice that for the airfield. These two sites are less than a mile from each other and will have similar rainfall, yet there is almost a factor of two in the surface water retention volumes, despite the well-known flooding difficulties of the airfield site. It is clear that either one figure is too high, or the other too low.*

*We understand that Grove Parish Council have commented on the lack of clarity of the 'Technical Explanation' relating to the Airfield development and it has requested an independent review of the drainage proposals. But we believe that it is the responsibility of the Vale to ensure that consistent methodologies are used and the true implications of drainage proposals are identified before any developments take place.*

## Core Policy 33: Natural Resources

The policy states that "all development proposals will be required to make provision for the efficient use of natural resources."

### Our response:

*We have no objections to this policy.*

## Core Policy 34: Landscape

The policy states that "The Vale's distinct landscape character and key features will be protected against inappropriate development and where possible enhanced."

### Our response:

*We believe that the distinct landscape character will change dramatically for the worse as a result of the other policies and as such this policy is not achievable.*



## Core Policy 35: Green Infrastructure

The policy states that “A net gain in green infrastructure, including biodiversity, will be sought either through on site provision or off-site contributions and the targeted use of other funding sources.”

### Our response:

*We support the concept of Green infrastructure but believe that much can be achieved by maintaining public footpaths, hedgerows and byways in their natural state and avoiding turning such access routes into concreted areas.*

## Core Policy 36: Conservation and Improvement of Biodiversity

The policy states that “Opportunities for biodiversity gain, including the connection of sites, large-scale habitat restoration, enhancement and habitat re-creation will be sought, with a primary focus on delivery in the Conservation Target Areas. If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then planning permission will be refused.”

### Our response:

*We believe that significant harm to biodiversity is not acceptable and should not be considered – any developer who does such harm should be banned from further development in the Vale.*

## Core Policy 39: The Wiltshire & Berkshire Canal

The policy states that the “council will continue to safeguard a continuous route for restoration of the Wiltshire & Berkshire Canal using the historic line and the diversion south of Abingdon-on-Thames to be identified on the Adopted Policies Map.

The council will support schemes for restoration of the canal in line with the delivery plan identified in the Wiltshire Swindon & Oxfordshire Canal Partnership Strategy”

### Our response:

*We support this strategy.*



## Sub-area strategies

The LPP1 identifies three policy sub-areas, which have different issues and characteristics, and sets out any policies for individual locations. The sub-areas give spatial expression to the strategy and ensure that it is locally distinctive and focused on each part of the district.

### Our response:

*The key to the plan is the definition of the sub-areas. We believe this definition is wrong. The definition should be based on the tenets of sustainability and sustainable development therefore it should be based around ALL aspects of sustainability including that of employment. The South East Area should be split into two:*

- *The employment areas of the Enterprise Zone Sites of Milton Park and Harwell Oxford Campus and the Didcot Fringe*
- *The rural area around Wantage and the surrounding villages of Ardington, Denchworth, East Challow, East Hanney, East Hendred, East Lockinge, Ginge, Grove, Letcombe Bassett, Letcombe Regis, West Challow, West Hanney, West Hendred and West Lockinge.*

*We believe that these two areas have different distinct characters and should be considered separately not as a whole.*

Due to a lack of resources the Wantage and Grove Campaign group has not reviewed the sub-strategies for the other areas in detail; we are happy to do this after 9 May if this would help the cohesion of the LLP1.

## Core Policy 6: Spatial Strategy for Abingdon on Thames and Oxford Fringe Sub-Area

*We note that of the target of 2,211 homes allocated to this area, 1226 have been completed, 766 are committed and 299 remain unallocated. We also note that 3.2 hectares of employment are proposed including 1.5 at Wootton Business Park.*

## Core Policy 7: Abbey Shopping Centre and the Charter, Abingdon on Thames

The policy states that “Within the Abbey Shopping Centre and the Charter Area (to be defined on the Adopted Policies Map) proposals which lead to environmental enhancement and major refurbishment or development will be supported.”

*We are not sure what “will be supported” means. The plan should make this clear.*

## Core Policy 8: Botley Central Area

The policy states that “Proposals for a comprehensive retail-led redevelopment and upgrading of Botley central area, as defined on the Adopted Policies Map, will be supported.”



*Once again we are not sure what “will be supported” means. The plan should make this clear.*

### **Core Policy 9: The Oxford Green Belt**

This policy states that “The Oxford Green Belt will continue to be protected to maintain its openness and open character. Inappropriate development that is harmful to the Green Belt will not be approved except where the scheme provides exceptional community benefits that cannot reasonably be provided elsewhere and outweigh the harm from the loss of Green Belt land in very special circumstances.

Development on previously developed sites within the Green Belt should not have a greater impact on the openness of the Green Belt and the purpose of including land in it than the existing development.”

*Although we agree with the underlying tenor of this policy we are not sure what the last sentence quoted above actually means. This should be clarified.*

### **Core Policy 10: Harcourt Hill Campus**

This policy states that “The council will work proactively with the University to develop a masterplan that meets its business objectives, for adoption as a supplementary planning document.”

*We assume that a supplementary planning document is similar to a neighbourhood plan.*

### **Core Policy 11: Safeguarding of land for transport schemes in the Abingdon on Thames and Oxford Fringe Sub-Area**

The LPP1 states that “the transport constraints at Abingdon on Thames are a key reason why strategic growth is not planned for the town in this document. At present there are no identified solutions to these problems, which are likely to be undeliverable without significant investment.”

It explains that “Planning and funding of transport infrastructure takes a long time to prepare. It is therefore proposed that the land relating to a possible future southern bypass and second Thames Crossing is safeguarded.”

### **Core Policy 12: Spatial Strategy for South East Vale Sub-Area**

The South East Vale Sub-Area will consist of thriving communities that have benefited from sustainable growth and the successful delivery of major infrastructure. The area will continue to be a vital economic area for Oxfordshire, including internationally important employment where new jobs have been provided alongside housing and community facilities.



Wantage and Grove will be places where people are proud to live and work and are recognised as a vital part of the Science Vale UK area.

### **Our response:**

*We note that of the target of 9,535 homes allocated to this area, 703 have been completed, 3613 are committed and 4800 have strategic sites identified and 419 remain unallocated. We also note that 132 hectares of employment are proposed including 11.4 at Grove Technology Park and Monks Farm.*

*If we split this sub-area into two:*

- The Eastern Area would have a target of 4,395 homes allocated to this area, 208 have been completed, 948 are committed and 2,550 have strategic sites identified, 419 remain unallocated. We also note that 121 hectares of employment are proposed but do not know what proportion are already built and occupied.*
- The Southern Area would have a target of 5,410 homes allocated to this area, 495 have been completed, 2665 are committed (including the airfield although we do not understand the definition of committed since outline planning permission has not yet been granted) and 2250 have strategic sites identified. We also note that 11.4 hectares of employment are proposed of which more than half are already completed and occupied.*

*In the Eastern Area, Harwell Oxford Campus and Harwell parish east of the A34 have all been identified as sustainable locations for strategic housing development. The provision of new housing will help to improve the self-sufficiency of the South East Vale Sub-Area overall and provide opportunities for living closer to places of work.*

*In the Southern Area, Wantage and the associated villages of Ardington, Denchworth, East Challow, East Hanney, East Hendred, East Lockinge, Ginge, Grove, Letcombe Bassett, Letcombe Regis, West Challow, West Hanney, West Hendred and West Lockinge sit at the foot of the Berkshire Downs in a rural location and are at least 8 miles from the centres of employment in the Enterprise Zones to the east and at Swindon to the west.*

*Job growth in the sub-area will be focused at the Science Vale UK sites in the Eastern Area, which make a nationally significant contribution to the UK economy and provide the area with a positive opportunity for providing more jobs.*

*Local needs in the rural Southern Area will be met with further employment development at Grove, which will help to strengthen the self sufficiency of the area. Existing employment sites will be protected in accordance with Core Policy 25.*

*The proposed housing and employment growth at Wantage and Grove should be proportionate to the character and employment opportunities of the area which should support the vitality and viability of the area, by among other things, increasing the population to support improvements to both services and the retail offer. Improvements are needed to a range of facilities at Wantage and these could include new indoor leisure facilities.*



*We note that there is no Core policy to support retail-led redevelopment and upgrading of services in the Wantage and Grove area even though these are the areas of the Vale where such facilities are in the greatest need.*

## Core Policy 13: Didcot A Power Station

This policy states that “Proposals for the redevelopment of up to 29 ha of the Didcot A site for employment uses (B1, B2 or B8) will be supported, especially where effective use can be made of the railhead. The mix of employment uses will need to reflect demand, suitability of the site, and any transport implications to be identified by a detailed transport assessment.”

### Our response:

*We support this policy wholeheartedly.*

## Core Policy 14: Transport Delivery for the South-East Vale Sub-Area

This policy states that “In order to deliver the growth in this sub area and the wider Science Vale UK area, the Science Vale UK Integrated Transport Package has been identified as necessary to mitigate the impact of the planned growth across Science Vale UK and secure the future economic viability of the area.”

### Our response:

*The integrated transport package confirms that one of the priorities for action is making sure that land allocated for new development is located near to jobs and services and can be accessed by public transport, cycling or walking. It also states that the planning system should ‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable’ - how does the 10 miles from Wantage and Grove to the employment opportunities in Harwell and Milton Park achieve this?*

*Given that comments in the previous consultations raised concern that “there are little or no proposals for the A338 and A417 given the likely increase in the level of traffic on these roads” the local plan does not alleviate these concerns given that;*

- *traffic on the A417 and A338 will increase by as much as 70% as people from the new developments in Wantage and Grove have to drive to work and*
- *traffic emissions from road transport are higher than any other district in the South East.*

*Improvements to the A338 and the A417 to allow for cycle ways and bus laybys is a crucial part of the development of the Vale and should be included in the Core Policies.*

*There remains a long-term ambition for a station to be re-opened at Grove to provide easier access for rail travel towards London to the east, and Swindon and Bristol to the west but the high cost of this makes it a long term goal not likely to happen in the life of this plan. We are pleased to see that*



*that the safeguarding of land for the station and related infrastructure appear on the map in Appendix E if not included in the text.*

Core policy 14 also states that “The Wantage Eastern Link Road (WELR) is required to serve the strategic allocations at Wantage and Grove. It will help provide the development in this part of the sub area with good access to the major employment sites without significantly increasing traffic on local roads in Wantage. “

### **Our response:**

*It does not mention the Grove Northern Link Road (GNLR) which is a key part of the Grove Airfield development and will reduce the massive increase in traffic on the Denchworth and Oxford roads through the historic centre of Grove to the A338. We believe that this is as important as the WELR and should be given equal weight in the plan. It should therefore be included in the core policy.*

### **Core Policy 15: Safeguarding of land for transport schemes in the South East Vale Sub- Area**

This policy states that “The land that is required to be safeguarded for transport schemes is shown in the accompanying map (Appendix E). New development proposals should take account of all transport schemes listed.”

### **Our response:**

*This list should be extended to include cycle ways and lay-bys necessary to maintain traffic flows on the A417 and A338 as well as any improvements to the roads themselves.*

### **Core Policy 16: Upper Thames Reservoir**

Land is safeguarded for a reservoir and ancillary works between the settlements of East Hanney, Drayton and Steventon, until the outcome of the examination of Thames Water’s Water Resources Management Plan 2014. Until or subsequently subject to that decision development that might prejudice the implementation of the Upper Thames Reservoir will be refused.

### **Our response:**

*We cannot comment on this policy.*

### **Core Policy 17: Spatial Strategy for Western Vale Sub-Area**

*We note that of the target of 1,468 homes allocated to this area, 529 have been completed, 252 are committed, 350 are on strategic sites and 337 remain unallocated. We also note that 7.4 hectares of employment are proposed*







## Conclusion:

*The key tenet behind the plan is sustainability and it would be very useful to have a carefully defined definition of sustainability. We propose a definition in terms of:*

- *Housing need (assisting to meet the agreed housing needs for the next 5 years);*
- *Spatial strategy (providing housing in an area which does not affect AONB or Green Belt and which will not have an adverse impact on flood plains, or reduce the attractive and unique character and identity of the area);*
- *Provides the services required by the community it will create;*
- *Contributes to the maintenance and enhancement of the wider community to the extent that none of the services currently enjoyed by the wider community are impaired but may be improved;*
- *Reduces the overall carbon emissions of the Vale;*
- *Protects and supports the local environment.*

## Housing need

*We believe the proposed housing target to be totally unrealistic. It is based on the South East Plan which was prepared before the recession in 2007/8. This has now been revoked and the new figures should be based on the housing projections recently prepared by the government. We understand that the County will commission a new Strategic Housing Market Assessment later this year. The DCLG SHMA Practice Guidance published in 2007 suggests that as part of this process, it may be useful to review existing local and regional policies to determine the key issues, policy aspirations for the area and the role of housing in delivering the spatial vision for the community. Unfortunately this will not help as these have also been prepared based on the South East Plan which is no longer valid. All policies and aspirations should be open to question.*

*We also believe that housing targets should be defined so that they align with the Census dates so that targets can be based on solid statistics and performance measured accurately.*

*We support the core policy of a minimum requirement for affordable/social housing and believe that this should be scattered to avoid the formation of the types of ghettos seen in some parts of the country but 40% of the overall target is a very high figure and must be validated. There are only 1,202 households in the categories that require housing in the Vale therefore even if everyone on this list was provided with a rental property at a ratio of 25% of developments this would suggest that only 4,808 homes were required. This is obviously wrong.*

## Spatial strategy

*The key to the plan is the definition of the sub-areas. We believe this definition is wrong. The definition should be based on the tenets of sustainability and sustainable development therefore should be based around ALL aspects of sustainability include that of employment. The South East Area should be split into two:*

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- *The employment areas of the Enterprise Zone Sites of Milton Park and Harwell Oxford Campus and the Didcot Fringe*
- *The rural area around Wantage and the surrounding villages of Ardington, Denchworth, East Challow, East Hanney, East Hendred, East Lockinge, Ginge, Grove, Letcombe Bassett, Letcombe Regis, West Challow, West Hanney, West Hendred and West Lockinge.*

*We believe that these two areas have different distinct characters and should be considered separately not as a whole.*

*The Vale of the White Horse benefits from many opportunities particularly those associated with the potential for growth and job creation. However, it also faces a series of challenges to realise this potential. We also have to recognise that bringing innovation businesses into the area does not guarantee new jobs for the residents.*

*We believe that Core Policy 20 is too restrictive (a minimum density of 30 dwellings per hectare) and that a lower minimum density of housing should be considered. We live in a rural area and believe that secure open space for children to play, space to grow vegetables and park the cars necessary to live in the rural areas of the Vale is a minimum requirement.*

*The South East Vale Sub-Area Strategy states that any growth in the area must be "carefully coordinated to ensure service and infrastructure provision closely matches the needs". We do not believe that the proposed 5,500 homes in Wantage and Grove meet this criterion. Jobs will mainly be 10 miles away and public transport will not be sufficient to provide a viable alternative to the private car. No enhancements are planned for the A417 (except for minor improvements to Featherbed Lane and the Rowstock junction) sufficient to enable it to cope with additional buses, cyclists and 8,500 additional cars.*

### **Provides the Services required**

*New services and facilities should be planned to meet the demand created by new development and be delivered at appropriate timescales. This will ensure that the needs of both the existing community and future residents are provided for, but given that most of the existing services and infrastructure in Wantage and Grove are already close to or exceed capacity it is important that the plan ensures that the timing and delivery of services is appropriate and matches the need, not is built to an economic timetable derived by developers.*

*Where new services are to be delivered off-site – health services, Library services etc. land should be protected for these facilities in the plan.*

### **Contributes to the maintenance and enhancement of the wider community**

*We believe that the LPP1 should take account of the poor state of the infrastructure in the Vale as previous developments have been allowed without providing the required infrastructure and a lack of investment in roads, schools and leisure facilities in the past has meant that many of the current facilities are at or exceed capacity.*



*If the existing facilities cannot be brought up to a current standard, development should be limited until this can be achieved. If it is true that infrastructure has been traditionally provided or funded by developers through legal agreements under Section 106 of the Town and Country Planning Act (1990), then the money from previous developments should be available to improve or renew current facilities.*

*Core Policy 28 states that new retail development will be directed towards existing centres. We support this policy and query why the centres of Abingdon and Botley are the subject of separate Core Policies but Wantage is ignored. According to the Retail and Town Centre Study included with the Local Plan, Abingdon and Wantage town centres have a similar number of units but 28 units in Wantage are currently empty.*

### **Reduces the overall carbon emissions of the Vale**

*The district has the highest total greenhouse gas emissions in the County, and these are above the national average. Emissions from road transport are higher than any other district in the South East of England. However, the Local Plan has the objective of a Low Carbon Vale and making sure that land allocated for new development is located near to jobs and services, and can be accessed by public transport, cycling or walking.*

*In Chapter 3 some of the key outcomes are to:*

- *Prioritise development to where the need to travel by car can be minimised*
- *Avoid development in flood zones 2 and 3, ensure new developments do not increase the risk of flooding elsewhere and promote the use of Sustainable Urban Drainage Systems,*
- *Minimise and if possible reduce our carbon footprint by reducing the need to travel, promoting more sustainable forms of transport and promoting opportunities to meet energy efficiency standards for buildings and encouraging decentralised, low carbon or renewable energy,*
- *Support the appropriate reuse of previously developed sites*

*Any strategic development MUST meet these criteria if the carbon emissions are to be reduced. The plans for Wantage and Grove do not do this.*

### **Protects and supports the local environment**

*As we know most of the area around Wantage and Grove which is designated for strategic development is impervious clay soil which is prone to prompt flooding during very wet weather. Grove Airfield is a brownfield site subject to flooding and will require significant work to ensure that not only does the new development not flood but that the impact on existing land ensures that current run-off from the site is reduced. There are already problems near Letcombe Brook where properties regularly flood. The Crab Hill and Chain Hill sites both abut AONB and are on slopes where the run-off already runs over roads and pavements. Nothing is being done to alleviate this at the moment and any development on these sites needs to remedy existing problems as well as not cause future ones.*



*The Vale of White Horse occupies an attractive part of the Upper Thames Valley, but many developments proposed in the Vale about AONB land and we do not believe that an area of Outstanding Natural Beauty stops with a line on the map. Part of the beauty is in the view and where new developments are built so close to (or actually on AONB) this is not protecting the local environment.*

## Infrastructure delivery

The Council has adopted a categorisation for each infrastructure item, to reflect its importance to the delivery of the Local Plan 2029. Every item is classified as Critical, Necessary or Preferred.

*While road enhancements may not be Critical they are VERY Necessary and should be scheduled very early in any developments as should the provision of primary and secondary schools. We do not want to wait 3-5 years for these core components of the infrastructure.*

*We believe that if the aspiration of the Vale to be Low Carbon is to be taken seriously then the provision of Local Pedestrian and cycle links should be at least Necessary if not Critical.*

*The Preferred classification includes some things that are important (such as Public Transport - Local Town Services, Public rights of way improvements, Provision of internal greenways for walkers, cyclists and horse riders, Improvements to or replacement of the Wantage Leisure Centre, a Specialist Health and Wellbeing Centre and Enhancements to Local Library services) and some things that are nice to have (such as community art). These should be separated.*

*BUT no mention anywhere of improving parking facilities in Wantage Town Centre and rejuvenating the Town Centre - surely these should appear as necessary.*

## In summary

1. The figures for housing need identified in the Plan are based on unsound principles and are substantially too high.
2. Because of their different characters and the poor communication between them, Wantage and Grove and their surrounding villages should be treated as a separate sub-area for the purposes of planning from Milton Park, Harwell Oxford and the Didcot fringe.
3. Allocating housing disproportionately to Wantage and Grove is inappropriate because employment will be elsewhere and there are inadequate transport links to the areas of employment.
4. Inadequate attention has been paid to problems of flooding at the strategic sites around Wantage and Grove.
5. Wantage and Grove currently lack adequate facilities in terms of education, health, leisure, public transport and roads. There should be no plans for a significant increase in the population of this area without substantial enhancement of this infrastructure as a pre-condition. It is not sufficient to rely on minor developer-funded improvements staged over a long period.
6. No emphasis is given to the protection and rejuvenation of Wantage Town Centre even though Botley and Abingdon have separate policy statements.

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7. The LPP1 fails to respect the spirit of the National Planning Policy Framework in relation to proximity of homes to work, greenhouse gas emissions and the need to find ways to enhance and improve the places in which people live their lives.