

Wantage and Grove Campaign Group



Articles in the Observer and Sunday Times talk about the developments in Hook Norton increasing the size of the village by 10%. What about developments around Wantage and Grove increasing the size of the town by 70%?

We acknowledge that there is a housing shortage but developers have been planning a development of 2,500 homes at Grove Airfield for more than 10 years and won't start building until the financial circumstances are such that they will make enough profit (probably reducing the number of affordable homes in the mix and definitely not including the northern relief road which would be required to stop the traffic destroying the old centre of Grove).

We believe in sustainable development for our area but believe that a growth of over 5,000 homes in an area of only 7,635 homes is not sustainable without additional jobs for 12,000 people, road improvements, school places, health facilities and all the other infrastructure necessary to "enhance and improve the places in which we live our lives" (as the National Planning Policy Framework says).

The Framework goes on to talk about "improving the conditions in which people live, work, travel and take leisure" and "moving to a low carbon future" linking work places and homes with cycle ways, public transport and footpaths. If localism is about empowering communities then we should be able to stop development until we have guarantees that these developments will enhance and improve our lives.

Perhaps the best solution is that used 50 years ago, building new towns like Milton Keynes or Telford, then jobs, homes and the associated infrastructure can be built at the same time.

The development at Crab Hill is at urban density on the edge of a small rural town and does not include the full infrastructure required (employment, secondary school, roads, leisure facilities etc.) to make it a carbon neutral site.

We have submitted 25 questions to the Council about this planning application but to date have received no answers; we therefore reserve the right to amend our comments when answers have been received.

In the meantime:

This development will cover an area roughly 4 times the size of Charlton, add 1,500 houses, approximately 3,750 people, at least 2,350 cars and will require around 2,550 jobs and 750 educational places. It will add congestion on the roads and increase emissions but also provide homes, and possibly more business for the retailers in Wantage and Grove, although the relief road will direct traffic away from the town centre. Is the only reason for this development to create a new bypass for the town centre? How will that help the vitality of the town? Surely we need to encourage people into the town centre not encourage them to drive straight past?

We believe that the infrastructure of the area should be enhanced with the first new home not when all existing infrastructure is over capacity. We need schools, enhancements to roads (not just the relief roads around Wantage and Grove but also improvements to the major A roads for bus stops, cyclists and pedestrians), expansion to the health centre, extra parking in the town centre, jobs locally - not 10 miles away - and all the other infrastructure required to maintain quality of life.

Even assuming that we need the 1,500 homes as well as the 2,500 homes on the Airfield, the 200 homes already approved at Stockham Park Farm, the 85 homes at Chain Hill and 133 on Old Station Road for which outline permission has already been granted, and all the smaller developments which are currently being built, why do they have to be on one site more than a mile from the Town

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Centre - this is effectively making a separate community on the outskirts of town. It will not be connected to the existing community of Charlton by road (only by footpath) and access to the site will be from the new bypass. We can understand putting some homes near the allotments on Grove Road (close to the shopping centre on Limborough Road), but should we really be extending the town boundary towards Lockinge and Ardington?

According to the Planning System: General Planning Principles statement produced by the then ODPM (2005) which remains extant, paragraph 17;

“In some circumstances, it may be justifiable to refuse planning permission on grounds of prematurity where a DPD is being prepared or is under review, but it has not yet been adopted. This may be appropriate where a proposed development is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the DPD by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the DPD. A proposal for development which has an impact on only a small area would rarely come into this category. Where there is a phasing policy, it may be necessary to refuse planning permission on grounds of prematurity if the policy is to have effect.”

The Vale of White Horse is making progress on the adoption of the Local Plan. This would not therefore be a circumstance where a refusal on the grounds of prematurity would cause undue delay to the planning strategy.

The Council clearly recognise the inappropriateness of determining major proposals ahead of the determination of the Local Plan strategy stating at paragraph C19 of the 5-year land supply housing statement (August 2013);

“At the time of this statement, the Council does not consider the draft Local Plan to be sufficiently advanced in its preparation for the draft strategic housing sites identified to be included in the deliverable supply (despite being considered as deliverable by the relevant agent or/and developer).”

and at paragraph 4.18 (p.46) of the Draft Plan stating;

“...we are progressing evidence base work including a Strategic Housing Market Assessment, Sustainability Appraisal, transport and viability assessments to inform a local decision on whether the South East Plan target remains appropriate. The housing figures in the final plan will be based on this evidence and may be different to those we are publishing now.”

It is clear that the proposal at Crab Hill is a major strategic housing allocation for the district and should be regarded as significant to the overall planning strategy, therefore bringing forward proposals ahead of the adoption of the Local Plan should be treated as premature under the planning system.

It is important to view the Local Plan process as culminating in a long-term blueprint to shape the future development of Wantage and Grove and the wider district and not as a quick fix for dealing with a planning application that could form a key part of the local strategy to 2029.

Also building such a large extension of Wantage at such high densities right up to the AONB boundary is not in the spirit of the legislation that guards protected landscapes and recognises the intrinsic character and beauty of the countryside as stated in the NPPF. It does not follow Core principle 7 in the NPPF in that it contributes “to conserving and enhancing the natural environment”.

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The density of the development proposed in the application ranges from 25 dwellings per hectare (dph) to 55 dph. The average density in the residential blocks is 35.2 dwellings per hectare. This seems too high a density for the rural edge of a small market town, when the density in Charlton is 24dph and the lowest area is 8dph.

The Council's Core strategy - which has not been approved and on which we weren't asked to comment on suggested that the site could accommodate:

- "- Up to 1,500 dwellings at an average net density of 40 dwellings per hectare;
- a mix of housing types and sizes including extra care housing for the elderly;
- at least 40% of the houses should be affordable but some designed especially for people with learning and physical disabilities and mental health needs and extra care housing;"

Core Policy in the Draft Local Plan 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."

As our comments to the draft plan state "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."

We would also suggest that the development should contain bungalows (as recommended by Government Minister Eric Pickles).

The Maximum Building Height Zones Parameter Plan shows the potential maximum height of residential and commercial development ranging from 2 storeys (9m) to 3 storeys (12m). There are no 3 storey buildings in Charlton and any development over 9m would be out of character with the local area.

In 'The Future of Transport White Paper, A Network for 2030' it states that "a transport network is needed that can meet the challenges of a growing economy and the increasing demand for travel, but can also achieve their environmental objectives. This means coherent transport networks with:

1. The road network providing a more reliable and freer flowing service for both personal travel and freight, with people able to make informed choices about how and when they travel;
2. The rail network providing a fast, reliable and efficient service, particularly for interurban journeys and commuting into large urban areas;
3. Bus services that are reliable, flexible, convenient and tailored to local needs;
4. Making walking and cycling a real alternative for local trips; ..."

The road network around Crab Hill does not provide a reliable and free flowing service as the A417 and A338 are both close to capacity and whenever there are problems on the A34 (a frequent occurrence) the local network becomes very congested. No improvements are proposed to the A roads except perhaps for some improvements to the Rowstock roundabout and the end of Featherbed Lane on the A417. If, or when, the Grove Airfield development is completed there may

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be additional traffic lights on the A338. None of the proposed improvements will make it easier to cycle to areas of employment or improve bus services or allow cars to overtake cyclists or buses on any of our main roads. Laybys for bus services and cycle ways would improve the capacity of the roads but this application does not mention any such improvements or provide any funding for this in future.

The TRICS data shown in Appendix A of the Transport Assessment Scoping Study included in the application is considered to represent travel patterns in Wantage and Grove yet all of the areas referenced in the study are parts of larger conurbations. In these areas the likely travel patterns would be affected by the availability of public transport (likely to be more frequent than the hourly service here) and the distances to work/school/ shops etc. which are likely to be shorter.

Appendix A of the submission paragraph 5.8 states that "It is considered that neither the primary school or the local centre will generate new trips onto the surrounding local highway network and have therefore been excluded from trip generation calculations." This assumes that no children from the rest of Wantage and Grove will attend the school or use the local centre. If this development is to be absorbed into the area this has to be the case therefore the transport calculations are based on wrong assumptions.

Paragraph 6.2 goes on to say that "distribution assumptions have been made for each of the phases .. these assumptions [are derived with] reference to the 2001 Census and specifically data sets which relate to travel to work patterns for the wards of Wantage Charlton, Wantage Segsbury and Grove. Transport patterns have changed significantly since 2001 as areas of employment have changed and travel patterns and lifestyles have also changed. We would consider that the calculations are based on wrong assumptions and should have been derived based on 2011 figures or as a minimum the analysis performed by the Vale in 2008 "Analysis of travel patterns of people living in new homes built between 2001 and 2007 in the Vale of White Horse".

This analysis states that: "The highest proportion of residents from Wantage and Grove are travelling between 15 and 30km to work, mainly to Oxford, Abingdon and Didcot." And that "The figures show that there is a heavy dependence on the car to get to work from all areas of the Vale".

It also shows that car usage is increasing and that car usage in this area is higher than in many parts of the country. All of this suggests that the traffic analysis and parking requirements should be adjusted to reflect the latest information and should not be based on 12 year old statistics.

The application states that "The impact assessment has shown that there will likely be a short term impact at junctions within the centre of Wantage, however these are not considered to be severe and therefore given the ability to deliver the Wantage Eastern Link Road as part of the development of Crab Hill, short term mitigation is not considered necessary or a beneficial use of financial resources." Short term in this context seems to mean from 2014-2022 – 8 years. What mitigation does the Planning Department propose to ensure that the impact on the centre of Wantage does not have a detrimental effect on the vitality of the town centre over this period?

The rail network providing a fast, reliable and efficient service? Our local station was closed many years ago and the nearest station is at Didcot Parkway. This is 20 minutes away by car – if you can find parking and the only bus (from mid October) will be the 32 which takes 40 minutes and runs hourly. This doesn't make it very good for commuting!

Bus services are not frequent or necessarily convenient or reliable. They do rely on the road network and as this becomes very congested at rush hours, this is not reliable. As someone said recently "try

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reaching a central Oxford destination for 9 pm, from Wantage, as things are - bearing roadworks in mind! The 7.45 bus from the Market Place cannot be depended on to do this, with the long tail-back from Frilford lights, plus heavy congestion on Botley Road (and other routes)”.

Making walking and cycling a real alternative for local trips is a joke. The trip from the Crab Hill development to Waitrose or Sainsburys will be more than a mile on footpaths often in need of repair. Cycling is only an option if you don't have a young family and don't have to transport heavy shopping. Cycling along the A417 or A338 (the routes to most employment) is very dangerous – a recent exercise by the Campaign Group cycling from Wantage to the Rowstock roundabout (half way to Harwell Campus or Milton Park) had every cyclist, even those with much experience, saying never again. The application suggests that the developers will bring the foot / cycle path out from the edge of Wantage to a point in the development but we would prefer it to continue to the WELR so that it can be used by cyclists to link to the West Lockinge road and join the Regional Cycle Route 44 to Harwell. This is the only safe cycling route but doesn't extend to Milton Park.

This application makes no mention of secondary school investment and relies on the Grove Airport development to provide any improvement. Even if, or when, this school is built and occupied, this will be approximately 2.5 miles from the development. King Alfreds Academy is the only secondary school in the area and will not be able to cope with the 2017 intake from existing primary schools and that is before the new homes already being built in the catchment area are occupied. The next nearest secondary schools are Abingdon, Didcot or Faringdon. Scarce financial resources will be used in bussing children to these other schools.

Primary schools are already full and this application supports the provision off the A417 Reading Road of a primary school in the first phase of development (when 450 homes are built) but the County Council has to prepare the county council specification for a new school and invite tenders. The applicants have to be approved, agree a syllabus, employ staff and open the school. This is unlikely to be completed before 2019/2020. This means children being bussed to alternative primary schools for about 6 years. This is not meeting the NPPF requirements when it states **“improving the conditions in which people live, work, travel and take leisure”**.

Without guarantees of enhancements to existing primary schools and secondary schools in the area, no further developments should be approved.

Health facilities are also close to capacity and Oxford has already the worst record for hospital bed blocking in the country. This development alone will require 3 new full-time GPs and their ancillary services to provide basic general medical care. The Health Centre in Mably Way would have to be expanded to accommodate new doctors and nurses at financial cost to the practices themselves. The airfield build would require another new GP per 500 homes as well. Will the funding for such developments in GP services be provided in a timely manner (to ensure that services are in place before the level of service provided to existing residents becomes unacceptable)?

The waiting times are A&E continue to grow and the demand for care for older people is predicted to exceed supply within the next 10 years. How can we be sure that these developments do not make this worse? No care facilities are proposed in this application. Should the Council be considering bringing services back to Wantage Hospital or improving the services provided at the Health Centre on Mably Way in parallel with this vast increase in housing?

Thames Water has stated that there would not be capacity within the local foul sewerage system to accommodate the flow generated by the Site. They have stated that no more than 40 homes can be

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built before a new sewer is provided to connect the north-west corner of the Site to the Wantage sewage treatment works. If our sewerage system is so close to capacity, how can we be sure that this limit will not be affected by other developments already approved or to be approved prior to these houses being built?

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 developer-funded improvements staged over a long period. If the Council is "attempting to borrow money" to fund the early development of Wantage Eastern Relief Road, we cannot feel confident that funding for new schools, residential care, drains, and further roads could be available for these to be in place in time for the proposed greatly increased local population.

The proposal includes a significant proportion of affordable homes. We support this but want to ensure that the affordable homes don't result in an estate like St Mary's where it is now 85% affordable housing. The Council Policy is to "pepper" the affordable homes across the development, what assurances do we have that this will happen?

The application included very few business premises and will result in people requiring approximately 2,550 full-time equivalent jobs. This is in addition to the jobs required for ongoing developments and those likely to be required for Grove Airfield. No further significant commercial developments are envisaged in Wantage and Grove and with the additional housing developments proposed and being built at Didcot and Swindon, there is likely to be a significant shortfall in employment. We assume that the new housing bonus will be sufficient to offset the reduction in Council tax on those homes which are not earning enough to contribute.

Finally the application 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. 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 draft 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. This application fails this test.

In summary:

1. It is clear that the proposal at Crab Hill is a major strategic housing allocation for the district and should be regarded as significant to the overall planning strategy, therefore bringing forward proposals ahead of the adoption of the Local Plan should be treated as premature under the planning system: General Planning Principles statement paragraph 17.
2. Also building such a large extension of Wantage at such high densities right up to the AONB boundary is not in the spirit of the legislation that guards protected landscapes and recognises the intrinsic character and beauty of the countryside as stated in the NPPF. It does not follow Core principle 7 in the NPPF in that it contributes "to conserving and enhancing the natural environment".
3. The density of the development proposed in the application ranges from 25 dwellings per hectare (dph) to 55 dph. The average density in the residential blocks is 35.2 dwellings per

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hectare. This seems too high a density for the rural edge of a small market town, when the density in Charlton is 24dph and the lowest area is 8dph. As our comments to the draft plan state "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."

4. We would also suggest that the development should contain bungalows (as recommended by Government Minister Eric Pickles).
5. The Maximum Building Height Zones Parameter Plan shows the potential maximum height of residential and commercial development ranging from 2 storeys (9m) to 3 storeys (12m). There are no 3 storey buildings in Charlton and any development over 9m would be out of character with the local area.
6. The TRICS data shown in Appendix A of the Transport Assessment Scoping Study included in the application is considered to represent travel patterns in Wantage and Grove yet all of the areas referenced in the study are parts of larger conurbations. In these areas the likely travel patterns would be affected by the availability of public transport (likely to be more frequent than the hourly service here) and the distances to work/school/ shops etc. which are likely to be shorter.
7. Appendix A of the submission paragraph 5.8 states that "It is considered that neither the primary school or the local centre will generate new trips onto the surrounding local highway network and have therefore been excluded from trip generation calculations." This assumes that no children from the rest of Wantage and Grove will attend the school or use the local centre. If this development is to be absorbed into the area this has to be the case therefore the transport calculations are based on wrong assumptions.
8. Paragraph 6.2 goes on to say that "distribution assumptions have been made for each of the phases .. these assumptions [are derived with] reference to the 2001 Census and specifically data sets which relate to travel to work patterns for the wards of Wantage Charlton, Wantage Segsbury and Grove. Transport patterns have changed significantly since 2001 as areas of employment have changed and travel patterns and lifestyles have also changed. We would consider that the calculations are based on wrong assumptions and should have been derived based on 2011 figures or as a minimum the analysis performed by the Vale in 2008 "Analysis of travel patterns of people living in new homes built between 2001 and 2007 in the Vale of White Horse".
9. The application states that "The impact assessment has shown that there will likely be a short term impact at junctions within the centre of Wantage, however these are not considered to be severe and therefore given the ability to deliver the Wantage Eastern Link Road as part of the development of Crab Hill, short term mitigation is not considered necessary or a beneficial use of financial resources." Short term in this context seems to mean from 2014-2022 – 8 years. What mitigation does the Planning Department propose to ensure that the impact on the centre of Wantage does not have a detrimental effect on the vitality of the town centre over this period?
10. Primary schools are already full and this application supports the provision off the A417 Reading Road of a primary school in the first phase of development (when 450 homes are built) but the County Council has to prepare the county council specification for a new school and invite tenders. The applicants have to be approved, agree a syllabus, employ staff and open the school.

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This is unlikely to be completed before 2019/2020. This means children being bussed to alternative primary schools for about 6 years. This is not meeting the NPPF requirements when it states **“improving the conditions in which people live, work, travel and take leisure”**.

11. 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 developer-funded improvements staged over a long period.
12. Emissions from road transport are higher than any other district in the South East of England. This application requires approximately 2,550 people to travel to work by car to Harwell Campus, Milton Park, Abingdon, Didcot, Oxford, Swindon or further away. This will not support the objective of a Low Carbon Vale.