

VoWH Local Plan Part 2 Examination: Matters and Questions

Dandara Ltd Hearing Statement (Respondent ID: 758199)

Introduction

- 1.1 This Hearing Statement has been prepared by Dandara Ltd who are promoting land located to the West of Wantage for residential led, mixed-use development alongside the delivery of the West Wantage Link Road (WWLR), the route of which was safeguarded within the Local Plan Part 1 (LPP1). The site is not proposed for allocation within the Local Plan Part 2 (LPP2).
- 1.2 The Statement concisely addresses the relevant *'List of Matters and Questions'* (ID/3) and should be read alongside representations made by Dandara Ltd to the emerging LPP2 dated March 2017 and October 2017. As requested, a separate Hearing Statement has been prepared for each matter and question being addressed.

Matter 1 – Duty to Cooperate and Legal Requirements

Question 1.8 – Sustainability Appraisal and Spatial Strategy Reasonable Alternatives

- 2.1 Planning Practice Guidance (PPG) explains the role of the Sustainability Appraisal (SA) being *"... to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives"*. The SA therefore *"... can help make sure that the proposals in the Plan are the most appropriate given the reasonable alternatives"* (para: 001, ref ID: 11-001-20140306).
- 2.2 Table 6.1 of the 2017 SA identifies a refined shortlist of larger site options to be tested. This includes the site being promoted by Dandara Ltd which is listed within the table as 'West of Wantage North' for 800 new homes. It is important to note here that for the purposes of LPP2 site selection, land to the West of Wantage is assessed as falling within the South East Vale Sub-Area being adjacent to Wantage as a 'market town' (see Appendix A of Site Selection Topic Paper for East Challow and SA Table A).
- 2.3 Land to the West of Wantage is not progressed as a 'reasonable alternative' within Table 6.3 with the justification for exclusion provided in Appendix IV of the SA *'Larger Site Options: Appraisal'*. The justification for exclusion prior to 'reasonable alternative' assessment is given on pg. 101 of the SA and reads:

"Wantage is a market town with good transport links, reflecting the considerable amount of committed growth at Wantage/Grove; however, Wantage is located at the western extent of the Science Vale, and the site is some way distant from the town centre. Development would erode the important settlement gap between Wantage, East Challow and Grove".
- 2.4 Having regard to the more detailed assessment of the 13 larger site options within appendix IV of the SA (pgs. 90-99), it is not considered that this has been undertaken in a sound manner. Of particular concern is that Appendix IV does not apply the methodology used to consider 'likely significant effects' associated with the 'reasonable alternatives' set out in Appendix VI and explained at Section 7.2 of the main SA report. Not applying a consistent methodological approach across the SA results in the following two important inconsistencies:

- (i) The methodological approach taken towards assessing 'larger site options' and latter 'reasonable alternatives' is inconsistent within the SA;
- (ii) Without applying the scoring system used for assessing the 'reasonable alternatives' for the 13 'larger site options' considered in Appendix IV, makes it impossible to consider the objective performance of each site against the twelve environmental criteria listed.
- 2.5 It is considered that by not applying the same methodological environmental scoring system used to consider 'reasonable alternatives' within Appendix VI has contributed to an unevidenced and unjustified rejection of 'larger site option' alternatives. This has resulted in **no reasonable alternatives** being considered for the South East Vale Sub-Area within Table 6.3.
- 2.6 Our representations to the publication version VoWH LPP2 explained the assessment deficiencies contained within the SA for land West of Wantage. It is worthwhile revisiting these key points to demonstrate why sites which should have been assessed as 'reasonable alternatives' have been prematurely and unjustifiably excluded with the outcome that no reasonable alternatives were considered for the South East Vale Sub-Area.
- 2.7 Having regard to the reason given for the rejection of land West of Wantage reproduced in para. 2.3 above, and the environmental criteria assessment set out on pgs. 90-99 of the SA, we would point out the following:

Sustainability – Despite lying immediately adjacent to one of the three most sustainable 'Market Towns' in the Vale, as recognised within Core Policy 3 of the adopted LPP1, the SA concludes that *"growth to the West of Wantage is less well linked to Science Vale, and the sites in question are somewhat distant from the town centre"* (pg. 94). There is no accessibility evidence base provided to justify this conclusion and as we have shown in Section 3 of our representations to the publication version VoWH LPP2, land to the West of Wantage benefits from close and easy access to the range of shops, services and community facilities available within Wantage town centre.

What makes this assessment particularly unevidenced and inconsistent, is that the sustainability of many of the allocations proposed within the LPP2 villages are justified due to proximity to Wantage. For example, the 2017 Site Selection Topic Paper assessment for land north of Grove (GROV_A), which is both further from Wantage town centre and less readily accessible to the A417 and Science Vale including Harwell (n.b. especially following the completion of the WELR), reads *"Grove is located at the western extent of the Science Vale (where jobs are focused) but Wantage is a market town with a good offer ..."* (Appendix B, pg. 35). For East Hanney, the Site Selection Topic Paper tells us that the proposed allocation to the north of the village is sustainable because *"the site is immediately adjacent to the bus stop, with good connectivity to Grove, Wantage ..."* (Appendix B, pg. 28). There is a clear inconsistency and bias between site assessments in respect of sustainability and accessibility.

Settlement Gap – The landscape impact of development on land West of Wantage, including the potential for amalgamation between Wantage, Grove and East Challow, is considered in detail within Section 7.0 of our representations to the publication version VoWH LPP2. Detailed Masterplanning of the site was undertaken and submitted in conjunction with representations to both the preferred options and publication version VoWH LPP2 which demonstrated how circa 800 new homes could be delivered on the site whilst maintaining an

appreciable physical and visual green gap separating Wantage from East Challow. There is no indication within any of the site selection evidence base documents that the Council has assessed our representations and taken this Masterplanning into account. Indeed, the 2017 Site Selection Topic Paper, Appendix B on pg. 20 reads “... it is unclear how development would be masterplanned ...”, which is perhaps why the SA concludes that “development would erode the important settlement gap between Wantage, East Challow and Grove” (pg. 101).

There is a clear inconsistency in approach here as whilst the Council has not considered how careful Masterplanning on land at West Wantage could successfully address any physical or visual concerns surrounding amalgamation of settlements, on other sites proposed for allocation, Masterplanning has been used to address significant impacts:

- (a) **Kingston Bagpuize** – Despite the SA recognising on pg. 97 that “the East of Kingston Bagpuize with Southmoor site partially abuts the Kingston Bagpuize with Southmoor Conservation Area, and would be highly visible on the approach to Kingston Bagpuize with Southmoor house (grade II*)”, rather than rejecting at ‘larger site option’ stage, as with land West of Wantage, it is considered that “there is good potential to sufficiently mitigate impacts through Masterplanning, design and landscaping”;
- (b) **Harwell** – The SA recognises on pg. 101 that “redevelopment would involve making use of brownfield land, although part of the site is greenfield, and there will be a need for careful Masterplanning to avoid AONB impacts”. It is entirely inconsistent for the Council to take into account Masterplanning in respect of the impact of development on a national landscape designation which “... have the highest status of protection in relation to landscape and scenic beauty” (NPPF, para. 115) but not a local designation relating to settlement gaps;
- (c) **Dalton Barracks** – In the case of Dalton Barracks, which is located within the Green Belt, the SA makes explicit reference to detailed Masterplanning on pg. 100 whereby “it is noted that the site’s eastern extent has been ‘pulled in’, in order to maintain a landscape (Green Belt) gap between the site and houses along Whitecross Rd”.

It is inconsistent and unjustified to exclude a site from assessment as an SA ‘reasonable alternative’ due to a potential constraint which has been explicitly addressed through detailed Masterplanning work submitted to the Council in association with representations to various iterations of the LPP2. The Council has proceeded with a range of sensitive development sites which include national policy designations such as Green Belt and AONB, justified by reference to detailed Masterplanning work. If the Council had referred to Masterplanning undertaken for land to the West of Wantage in a manner consistent with their proposed allocations, it would have provided a realistic reasonable alternative for assessment within the South East Vale Sub-Area.

Market Saturation – Although not cited in the summary for land West of Wantage (north) on pg. 101 of the SA, the SA suggests on pg. 90 that the LPP1 allocates a significant number of new homes to Wantage and Grove and that “... the housing market might not support additional growth ...”. Not only is there no evidence provided to support such a conclusion, but the level of growth identified for the settlements overlooks the fact that the 2,500 homes allocated within the LPP1 for Grove Airfield have been carried forward from the 2011 Local Plan and should have already delivered circa 2,000 new homes (Local Plan para. 8.20). The housing market in Wantage and Grove has therefore been starved of housing over the past decade resulting in significant unmet need and worsening rates of affordability and

suppressed household formation. Indeed, Wantage, as one of the three most sustainable market towns, only accommodates one allocation within the LPP1 and the principle that the market cannot accommodate a further allocation within the LPP2, is fundamentally unsupportable. This approach is also inconsistent with the proposed LPP2 allocation of 400 homes at North-West Grove.

- 2.8 If the SA had undertaken a more quantitative assessment for each of the 13 'larger site options', consistent with that undertaken for the 'reasonable alternatives' at Appendix VI, rather than, as in the case of land West of Wantage, focusing on potential challenges to development, it would have demonstrated the sustainability and suitability of the site providing a 'reasonable alternative' that warranted assessment. Taking each of the 12 environmental criteria in turn:

Homes – Land to the West of Wantage is able to deliver circa 800 new homes alongside affordable adjacent to Wantage as one of the three most sustainable 'Market Towns' in the Vale and would therefore result in a **positive** significant effect;

Services and Facilities – Land to the West of Wantage not only provides ease of access to the range of shops, services and community facilities located in the centre of Wantage, as well as associated with Grove Airfield, but would also provide a quantum of development capable of delivering on-site provision including community facilities and retail opportunities and would therefore result in a **positive** significant effect;

Movement – As the SA recognises on pg. 94, "... there is considerable committed growth in the area, which is leading to significantly improved bus services to Milton Park and Oxford, and a new/upgraded cycle link to Harwell Campus. Also, additional growth at Wantage supports the case for a new train station at Grove ... the larger, northern site could help to facilitate delivery of the West Wantage Link Road (WWLR), which would serve to reduce traffic through West Wantage and East Challow". Appendix A of this Statement provides a high level summary of the principal benefits of the WWLR to the west of Wantage and East Challow. Based on the range of public transport options accruing to the site and the potential for development to deliver the LPP1 safeguarded WWLR, land West of Wantage would result in a **positive** significant effect;

Health – Land to the West of Wantage is well located to access existing health facilities including the Newbury Street Practice on Mably Way and is of a scale to provide additional services if a need is identified. The location of the site adjacent to Wantage would encourage walking and cycling into the town centre alongside links into the adjacent countryside including alongside the Wilts and Berks Canal to promote health and recreation resulting in a **positive** significant effect;

Inequality and Exclusion – Generally not applicable as recognised within the SA on pg. 95;

Economy – The Masterplan for the site shows the opportunity for an element of commercial development associated with the adjacent Crown Packaging facility and Grove Technology Park. In addition, jobs would be created during the construction phase for both the new homes and WWLR resulting in an overall **positive** significant effect;

Natural Environment – Whilst ecological evidence submitted alongside earlier iterations to the emerging LPP2 have shown the site to be of local ecological value only, there are riparian habitats associated with the Wilts and Barks Canal for which mitigation can be provided

alongside development with potential enhancements. This would result in a likely **neutral** effect;

Heritage – There are no international or national designated heritage assets within the site or its setting including listed buildings or Conservation Areas resulting in a **neutral** effect;

Landscape – Unlike proposed development at Harwell, land West of Wantage is not located within the AONB with the October 2017 HELAA stating that land to the West of Wantage “does not impact on this [AONB] designation” (Appendix 19, pg. 7). The site is not a valued landscape and whilst concerns have been raised regarding the existing settlement gap, meaningful separation can be maintained through careful Masterplanning within a strong landscape-led framework. This would result in a likely **neutral** effect;

Pollution – By locating development within easy walking and cycling distance of the various shops, services and community facilities available within Wantage town centre, alongside the improved range of public transport services proposed for the settlement, use of the private car would be minimised due to the inherently sustainable location of the site resulting in a **neutral** effect;

Climate Change Mitigation / Adaption – All development is proposed on FZ1 land and any future development would include sustainable urban drainage systems and new dwellings which minimise the use of resources resulting in a **neutral** effect.

- 2.9 Because the SA has not objectively assessed land West of Wantage against submitted evidence in a consistent, coherent manner, it has resulted in no ‘reasonable alternatives’ being considered for the South East Vale Sub-Area within Table 6.3. As we will go on to explain for other matters, this has led to a Plan which cannot be considered ‘justified’ being the most appropriate strategy when considered against reasonable alternatives – particular in respect of departing from the LPP1 chapter 4 spatial strategy and settlement hierarchy resulting in “... no LPP2 allocations are proposed at a market town (Abingdon, Wantage, Faringdon)” (SA, para. 10.3.2).

Traffic Modelling Summary

Scenario	What's Included?
2017 Base	Traffic counts undertaken during December 2017 and January 2018 following agreement with OCC on model approach and methodology
2031 Reference Case Scenario	Development Sites included in Vale of White Horse Local Plan Parts 1 and 2 excluding Crab Hill development , and East Swindon Villages Infrastructure Improvements Junction improvements associated with Grove Airfield scheme.
2031 Wantage Eastern Link Road Scenario	Development As above, including Crab Hill development. Infrastructure Improvements WELR and associated access junctions
2031 Wantage Western Link Road Scenario	Development As above, including West Wantage development Infrastructure Improvements WWLR and associated access junctions

Traffic in East Challow

- Current two-way traffic flow on the A417 through East Challow is 854 vehicles over the AM peak hour and 761 vehicles over the PM peak hour.
- Accounting for the committed developments, background traffic growth, and the inclusion of the WELR **but not WWLR**, traffic on the A417 will increase by 30% in the AM peak hour to 1,116 two-way vehicle movements by 2031 and 34% in the PM peak hour to 1,019 two-way vehicle movements;
- In the AM peak the WWLR reduces traffic on the A417 to 720 two-way vehicle movements resulting in a 35% reduction of the level of traffic predicted to occur in 2031 and would be an improvement even on the existing situation;
- In the PM peak, the WWLR reduces traffic on the A417 to 600 two-way vehicle movements across the PM peak period resulting in a 59% reduction in traffic flows relative to 2031 and would also be an improvement on the existing situation.

Traffic at A417 / Denchworth Road Junction

- Given predicted traffic growth between 2017 and 2031, significant congestion is forecast in this location without the WWLR as the provision of the WELR only forms half a bypass requiring all east-west traffic to still route through this junction and along the edge of western Wantage into East Challow;
- In the AM peak, Vehicles travelling from East Challow would each be delayed on average by over 1½ minutes on the approach to this junction, with delays of 1½ minutes also predicted on the Denchworth Road approach to the junction;
- The reduction in traffic on Challow Road following the introduction of the WWLR has a significant positive benefit in this location, with delays on the A417 approach from East Challow reducing by 40% and across the junction as a whole by 25%;
- As with the AM peak, the predicted traffic growth between 2017 and 2031 results in significant congestion in this location without the WWLR. The WELR allows east-west traffic to bypass the town centre but upon arrival at Mably Way, vehicles are expected to then route along residential streets and through East Challow if travelling further west;
- In the PM peak, delays of over 1½ minutes are forecast on the Denchworth Road approach to the junction in the WELR scenario which are reduced by over 50% following the introduction of the WWLR.