

Name of the Local Plan to which this representation relates:

Vale of White Horse  
Local Plan 2031 Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

This form has two parts:

**Part A** – Personal Details

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing (where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

### 2. Agent's Details (if applicable)

**Sharing your details:** please see page 3

## Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph 2.39      Policy 4a      Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant      Yes       No

4. (2) Sound      Yes       No

4. (3) Compiles with the Duty to Cooperate      Yes       No

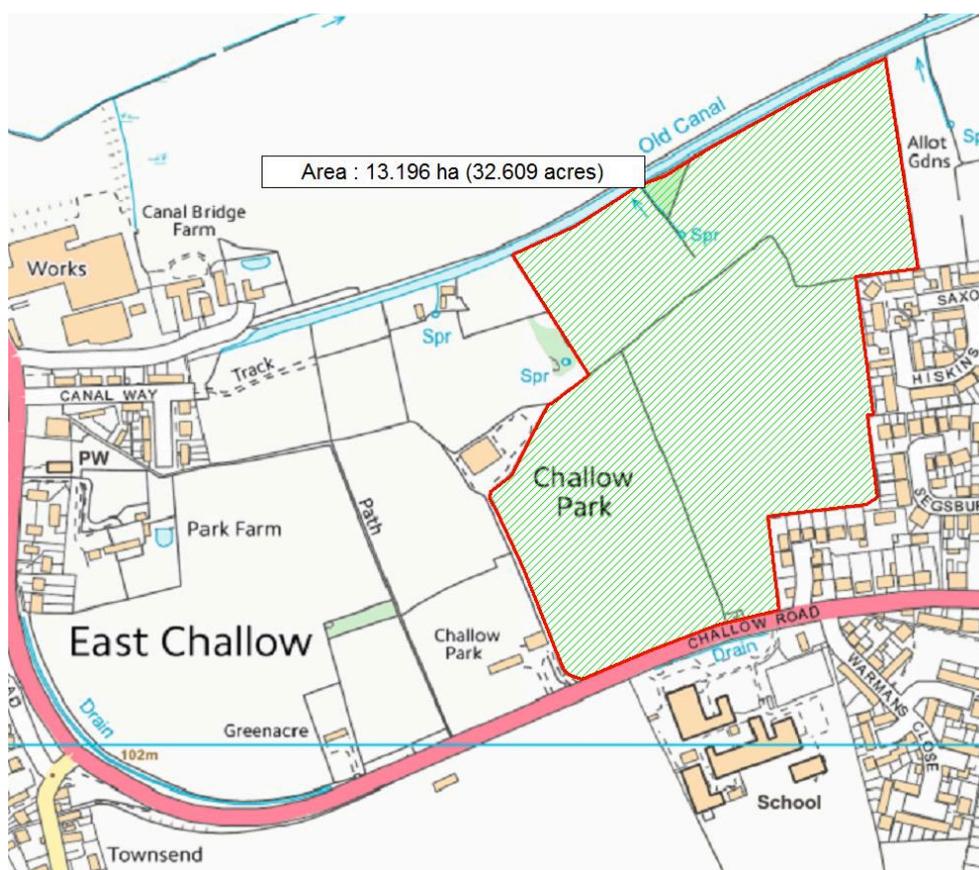
5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.  
 If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

**Summary:**

These representations have been prepared by Paul Butt Planning Ltd on behalf of Drivewalk Ltd who is promoting 13.196ha/32.609acres of land (the Land) identified in Figure 1 below and located adjoining and to the West of Wantage, the only Market Town in the South East Vale Sub Area, and opposite King Alfred’s Academy for a residential-led, mixed-use development. Amongst many other public benefits, a development of the Land would assist in the delivery of the West Wantage Link Road and the reopening of Grove railway station that are safeguarded in the Local Plan 2031 Part 1 (the LPP1). The Land forms part of site ref. EACH06 in the Housing and Economic Land Availability Assessment October 2017 (the HELAA), EACH\_A in Topic Paper 2 Site Selection, and is referred to as West of Wantage (South) in the Sustainability Appraisal September 2017 (the SA).

The representations demonstrate that the Local Plan 2031 Part 2 (the LPP2) is **unsound** having regard to the four tests set out at para. 182 of the National Planning Policy Framework (the Framework) due to it **not being justified** (in not being “*the most appropriate strategy, when considered against reasonable alternatives*”) **nor consistent with national policy** (in not enabling “*the delivery of sustainable development in accordance with the policies in the Framework*”)

Figure 1. The Land.



**Main reasons:**

The main reasons the LPP2 is considered to be unsound are:

**(i) The proposed housing strategy in the LPP2 Policy 4a is not the most appropriate housing strategy ‘when considered against reasonable alternatives’.** The housing strategy in LPP2 derives from the SA which **is not robust**, for example in justifying ‘*the most appropriate strategy*’ Policy 4a allocates housing sites in the Green Belt and AONB when considered against reasonable alternatives that are not in the Green Belt or AONB. Indeed, specific policies in the Framework (footnote 9 on page 4) do not indicate development should be restricted on the Land. Furthermore the Land of itself has not been considered as a reasonable alternative in the SA. Rather the Land has been considered in the SA as part of a larger and ‘merged’ site that comprises the whole of the land between Wantage and East Challow, and without properly considering the representations made in relation to the Land itself in the Local Plan 2031 Part 2 Preferred Options (the Preferred Options) consultation and in relation to the Sustainability Appraisal accompanying the Preferred Options. For example, it is anticipated that about a third of the Land (about 4.4ha) would comprise landscaping and public open space between the A417 opposite King Alfred’s Academy and the Wilts and Berks Canal to be maintained in perpetuity; and

**(ii) The housing allocations in Policy 4a are not in accordance with either the spatial strategy or the settlement hierarchy set out in the LPP1.** No justification has been given in the LPP2 for departing from the LPP1 spatial strategy and settlement hierarchy. There are reasonably alternative, much more sustainable, sites that are not in the Green Belt nor the

AONB, adjacent to the Market Town of Wantage and which are able to accommodate new homes in a way that does not depart from the LPP1 spatial strategy or settlement hierarchy.

Development of the Land adjoining the Market Town of Wantage for housing, where specific policies in the Framework (footnote 9 on page 4) do not indicate development should be restricted, is a reasonable alternative and the most appropriate strategy that will enable the delivery of sustainable development in accordance with the policies in the Framework. At the same time such development help in delivering the growth in the South East Vale Sub-Area (Wantage being the only Market Town in this sub-area) and the wider Science Vale area, including by assisting in the delivery of the West Wantage Relief Road (WWRR) and the reopening of Grove railway station in a way that the Policy 4a housing allocations will not do.

However, the Land, as it lies in the Western Vale Sub-Area and not within the South East Vale Sub-Area nor the Science Vale area due to an arbitrary line shown on the LPP1 Adopted Policies Map being tightly drawn against the extent of existing development to the West of Wantage, has been ruled out in the SA for that reason (see para.s 6.2.14 and 6.2.15 of the SA). In effect anything to the West of Wantage is on the ‘wrong’ side of the line for the SA to consider as a ‘reasonable alternative’ to the housing allocations in Policy 4a, which comprises sites in the Green Belt and AONB and adjoining settlements at a much lower order in the settlement hierarchy.

Reference is also made in the SA on page 98 to the landscape to the West of Wantage:

*“the entire West of Wantage area acts as a landscape gap separating the settlements of Wantage, East Challow and/or Grove (recognising that the Grove Airfield scheme will extend Grove to the southwest). Promoters of the smaller, southern site highlight that an adjacent scheme (to the west, bordering the eastern edge of East Challow) recently gained permission, with only localised landscape impacts highlighted; however, the site currently in question is considerably more sensitive, because it comprises **the remaining landscape gap.**”*

However, the Land does not comprise “the entire West of Wantage area” or “the remaining landscape gap” and as such the SA has not considered the Land as it has been promoted.

On the Local Plan 2031 Adopted Policies Map Western Vale Sub Area December 2016, an area of Important Open Land is identified, see extract in Figure 2 below, and to which Local Plan 2011 saved Policy NE10 applies. The Land comprises only a small part of the identified area and adjoins the existing built-up area of Wantage. The Land is also not demonstrably more sensitive in terms of landscape impact than the planning permission referred to in the SA on page 98 (ref. P16/V0652/O) for up to 88 dwellings to the East of East Challow, off Challow Road, see extract from the Reserved Matters application (ref. P17/V2031/RM) in Figure 3 below, and on which the Committee Report summarised that the:

*“limited and localised landscape and visual harm is considered outweighed by the benefits of the proposal.”* And in para. 6.30;

*“It is not considered the proposal unacceptably [sic] coalesces settlements”.* And in para. 6.31:

*“The site is outside the AONB and there is a lack of visibility between the site and AONB*

and vice versa. *The proposal has no impact on the setting of the AONB.*”

Figure 2. Extract from the Adopted Policies Map.

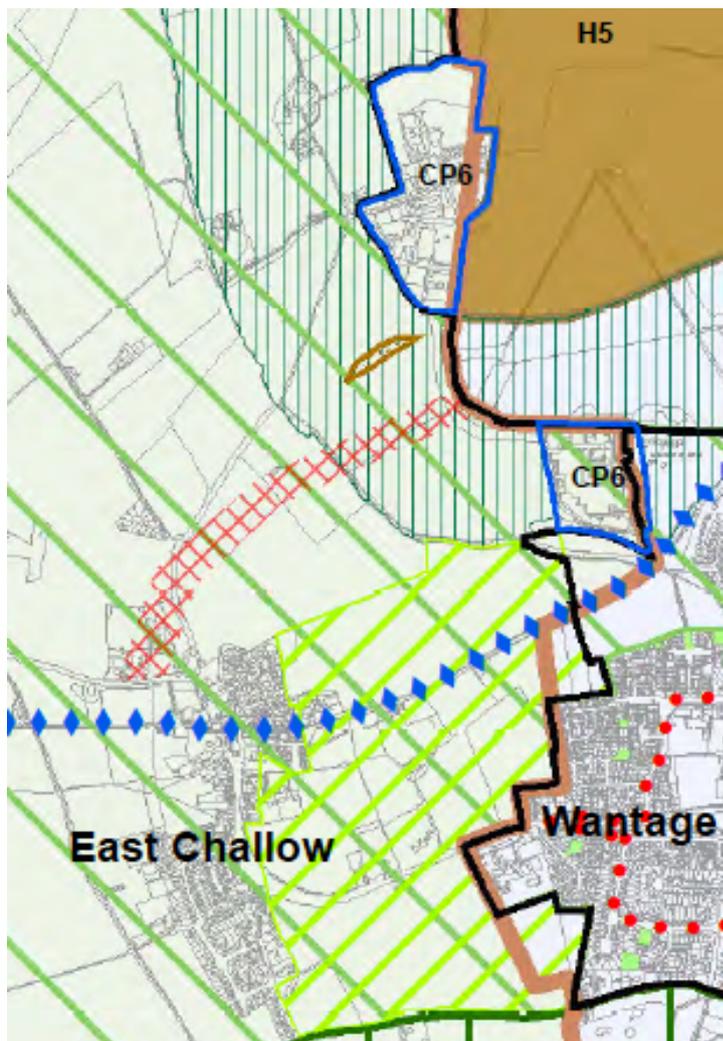


Figure 3. Extract from the proposed site plan ref. PL03A.



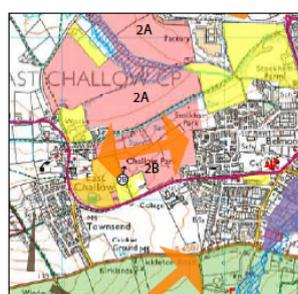
The Landscape Capacity Study March 2017 (the Study) identifies the Land on page 37 (reproduced in Figure 4 below) as forming part of site 2B comprising the whole of the land between Challow and Wantage. The Study does not consider the Land as it has been promoted nor the third of the Land (about 4.4ha) that would comprise landscaping and public open space between the A417 opposite King Alfred’s Academy and the Wilts and Berks Canal to be maintained in perpetuity. For information the Land, and the 4.4ha of landscaping and public open space lies behind the agricultural building shown just right of centre in the photograph with the Western edge of Wantage behind the agricultural building. An Addendum to the Study in October 2017 also does not consider the third of the Land (about 4.4ha) that would comprise landscaping and public open space.

Figure 4. Extract from page 37 of the Landscape Capacity Study, March 2017.

**2B: West of Wantage - South**



Photograph 2B: View east towards Wantage from the footpath which runs through the centre of the site



- Site Description**
- 1.1 Site 2B consists of one small arable field and several small fields in pasture, which lie between East Challow and Wantage. To the south-west of the site is a permitted development which would further diminish the separation between Wantage and East Challow.
  - 1.2 The site lies on a steep north-facing slope. These fields provide the essential separation to the two settlement. The northern boundary of the site is formed by a strong tree belt, beyond which is a public right of way. The southern boundary is defined by hedgerows and trees lining the A417 Challow Road. A footpath runs through the centre of the site. Fields are generally bound by hedgerows, however these are in a state of decline and have significant gaps in places.
- Site Visibility (see accompanying photograph above):**
- 2.1 The site is visible from both the eastern edge of East Challow and the Western edge of Wantage, with both settlements visible from the footpath that runs through the site. There are open views of the site from the footpath running north - south through the centre of the site. Settlement at Wantage is visible to the east and housing within East Challow is visible to the west.
  - 2.2 Tree belts and bunding screen views from the road to the south of the site, although there are long views available through gaps in the vegetation opposite the college. Site 2A is visible within these views.
  - 2.3 The footpath to the north of the site is enclosed by trees and vegetation, with the disused canal located between the path and the site. The site is only visible through gaps in the vegetation.
- Landscape Capacity:**
- 3.1 The site forms the essential separation between Wantage and East Challow and forms part of the landscape setting for both villages. The site is not suitable for development in landscape and visual terms and has not been considered further by the Vale of White Horse District Council.

LPP1 para. 5.93 “safeguards land to deliver a West Wantage Link Road (WWLR) connecting the A417 from Mably Way in Wantage to East Challow” as identified in Core Policy 18: ‘Safeguarding of Land for Transport Scheme in the South East Vale Sub-Area’ and Appendix E (page 67) and the Adopted Policies Map.

Land to the West of Wantage was promoted through LPP1 with the examining Inspector concluding in para. 147:

*“Policy CP17 safeguards an alignment for the West Wantage Link Road. Whilst there are some aspirations for this scheme to be implemented as soon as possible, to address existing congestion in/around Wantage, the Impacts Study does not indicate that it is currently necessary. However, the County Council contends that it is possible that it would be needed later in, or beyond, the Plan period. It has been argued that if additional housing sites to the west of Wantage were included in the plan the Link Road could be funded and delivered.*”

*However, bearing in mind the Impacts Study's conclusions, and in the context of there not being a need for this plan to allocate more sites for housing (as detailed in Issue 8), I conclude that the plan is not unsound in excluding these possible housing sites at this stage".*

The context has changed in that there is a need for LPP2 to allocate more sites for housing.

Regardless of this change in context, **to deliver the growth in the South East Vale Sub-Area and the wider Science Vale area CP17 requires all development within the South East Vale Sub-Area to contribute towards** the infrastructure identified within the Science Vale Area Strategy and which includes **the West Wantage Relief Road (WWRR)**. The Council's CIL Charging Schedule September 2017 identifies the land to the West of Wantage, including the WWRR, as lying within CIL Zone 1. The Council's Regulation 123 List September 2017 makes no reference to the WWRR being funded by CIL contributions. I am not aware of any development having contributed towards the delivery of the WWRR under CP17, which is somewhat at odds with Core Policy 17, which accepts that the WWRR is required to *"secure the future economic viability of the area"*. Perhaps this is because the WWRR actually lies in the Western Vale Sub-Area on the Adopted Policies Map December 2016, and not in the South East Vale Sub-Area or the Science Vale.

**(i) The LPP2 Policy 4a is unsound because the Sustainability Appraisal September 2017 (the SA) is not robust, Policy 4a not being the most appropriate housing strategy 'when considered against reasonable alternatives'.**

In establishing the preferred option the SA states in para. 8.2.1:

*"The Council's site selection has been informed by the SA and other wide-ranging factors. Key considerations include: minimising impacts on an already constrained highway network and seeking to maximise opportunities for supporting sustainable modes of travel; supporting housing delivery to fully meet the identified housing need for the district and for the agreed quantum of unmet housing need for Oxford to be addressed within the Vale and maintaining an up to date housing supply, which should rely, as far as possible, on allocating sites of different size, type and geography; supporting the delivery of appropriate infrastructure; and seeking to minimize any harmful consequences, such as harming the environment.*

*The site allocations set out in the Part 2 plan represent the Council's strategy for meeting sustainable development, having considered a range of alternatives (i.e. alternative sites, and alternative strategies)."*

**HELAA site ref. EACH06**, adjoining and to the West of Wantage, is identified by the

Council in the HELAA as *"Suitable for further consideration"*, available and deliverable for an indicative 220 dwellings, but **has not been robustly appraised as a reasonable alternative in the SA** to the extent that the Local Plan is not soundly based.

It is considered that there is a strong case that **the inclusion of site EACH06 in Policy 4a would be a soundly based housing allocation** and: (a) is not in the Green Belt (unlike the Dalton Barracks site); (b) does not amount to 'major development' in the AONB (unlike the Harwell Campus site); (c) would reinforce the Market Town role of this main settlement in the district which under Core Policy 3: Settlement Hierarchy of the LPP1 *"have the greatest*

*long-term potential* for development to provide the jobs and homes to help sustain, and where appropriate, enhance their services and facilities to support viable and sustainable Communities” (unlike the Larger Villages of East Hanney, Kingston Bagpuize with Southmoor, Marcham, and Harwell Campus, and the Local Service Centre of Grove); (d) would focus sustainable growth on a site that relates well to Oxford in transport terms, and to

the Science Vale area; (e) could be developed in a way that would maintain an appreciable countryside gap between East Challow and Wantage; and (f) would assist in achieving many public benefits including the delivery of the WWRR, the Grove railway station, and a north/south footway/cycleway link to King Alfred’s Academy. As such site EACH06 should be identified as an allocated housing site in Core Policy 4a.

It is not considered that the site EACH06 has been robustly appraised as a **‘reasonable alternative’ to the preferred spatial strategy** in the SA.

In the first instance, in the Topic Paper 2 Site Selection Appendix A October 2017 the Land, comprising HELAA site EACH06, was *“merged and carried forward for detailed testing”* with sites EACH05 and EACH08 (see the extracts from the Topic Papers in Figure 4 and the detailed tested sites in Figure 5 below).

Figure 4. Extract from the Topic Paper Appendix A.

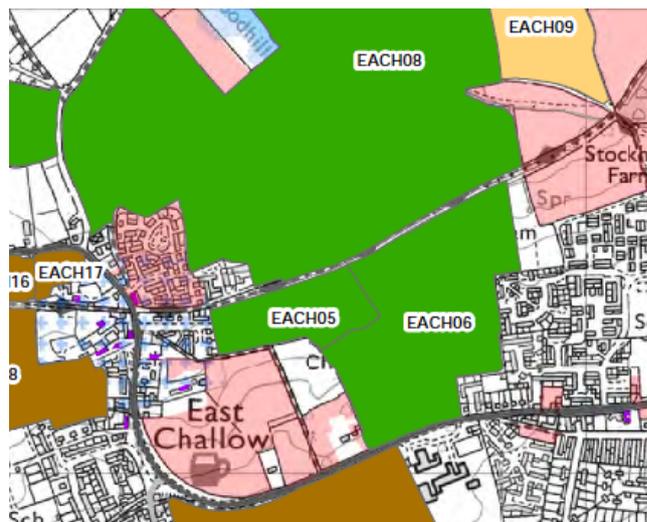
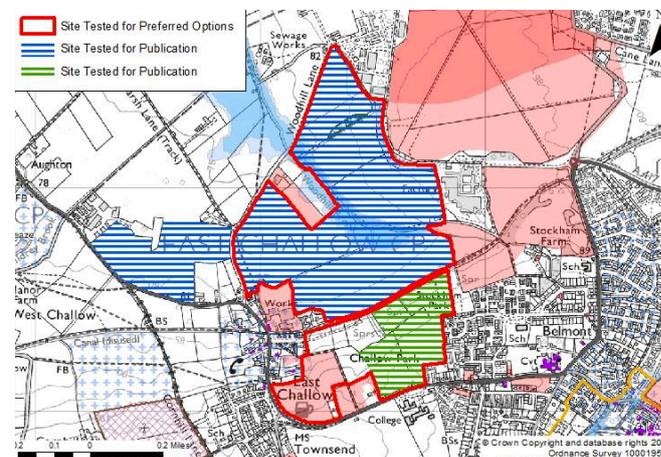


Figure 5. Extract from the Topic Paper Appendix B.



The assessment in Topic Paper Appendix B refers to the area crossed hatch in green, although this is larger in its extent than the Land that is promoted and does not take into account that approximately a third of it (about 4.4ha) to the west is proposed for public open space. In recommending that the green hatched land is not proposed for allocation Appendix B advises:

*“The smaller site to the south of the old canal (green on map) has been promoted for around 220 dwellings would **fundamentally erode the open gap between East Challow, particularly now that planning permission has been granted on land immediately to the west. The consideration of a smaller allocation would ultimately result in a similar outcome, and the Council does not recommend any of this land to be allocated in Local Plan 2031 Part 2.**”*

This statement is fundamentally at odds with the Council’s consideration in granting the planning permission under ref. ref. P16/V0652/O in which the Council considered there would be limited and localised landscape and harm and that the development would not unacceptably coalesce the settlement of East Challow and Wantage.

For information the provision of 220 dwellings on the Land, excluding the third of it or about 4.4ha proposed for landscaped public open space to the west, would be at a relatively low density of approximately 25dph.

Para.s 6.3.1, 6.3.3 and 6.3.4 of the SA focuses on strategic sites of >200 homes capacity, and as an initial step a list of c. 30 larger site options was established. The larger site option to the West of Wantage in Table A: Screening outcomes on page 85 states, following consideration earlier in March 2017 that site EACH06 to the West of Wantage was not within the reasonable alternatives:

*“**Subsequently determined to remain in contention, on the basis of new evidence/understanding, including detailed representations received from site promoters.***

*Also, screened-in in order to enable a strategic consideration of issues/opportunities/options at Grove/Wantage and Kingston Bagpuize with Southmoor, both of which are understood to be settlements potentially suited to growth”.*

In Table A on page 89 site EACH06 (the South site to the West of Wantage) is identified as in the SE Vale with an approximate number of 220 homes.

In terms of the SA appraisal findings on pages 90 - 101, Wantage is the only Market Town in the South East Vale Sub Area and on **the SA states in relation to Wantage:**

Page 90... *“the housing market **might not support additional growth** (i.e. there would be a risk of supply outstripping demand, **leading to decreased prices, and hence a situation whereby house-builders choose to delay delivery**).”*

This is an assertion that is based on no evidence. There is no intention to delay delivery of the Land.

Page 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.** 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**; however, 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. The LPP1 Inspector's Report (2016) stated: "Policy CP17 safeguards an alignment for the West Wantage Link Road. Whilst there are some aspirations for this scheme to be implemented as soon as possible, to **address existing congestion in/around Wantage**, the Impacts Study does not indicate that it is currently necessary. However, **the County Council contends that it is possible that it would be needed later in, or beyond, the Plan period**. It has been argued that if additional housing sites to the west of Wantage were included in the plan the Link Road could be funded and delivered. However, bearing in mind the Impacts Study's conclusions, and in the context of there not being a need for this plan to allocate more sites for housing, I conclude that the plan is not unsound in excluding these possible housing sites at this stage". The Inspector's reference to additional housing sites, in the plural, is notable. **It is likely that numerous sites would be necessary in order to fund the road.**"

All these matters support the allocation of the Land. **There is already a premium bus service route to Oxford from Wantage.**

Page 95... "Both West of Wantage sites are also notable for having direct access to the route of the former Wilts and Berks Canal, with there being **the possibility of restoration**; however, it is understood that there are currently funding shortfalls, such that restoration in the short to medium term is likely to be very limited."

The allocation of the Land for housing offers the opportunity to contribute to the restoration and enhancement of the Wilts and Berks Canal, including a generous linear public open space up to the adjoining existing allotment gardens to the Northeast.

Page 98... "the entire West of Wantage area acts as a landscape gap separating the settlements of Wantage, East Challow and/or Grove (recognising that the Grove Airfield scheme will extend Grove to the southwest). Promoters of the smaller, southern site highlight that an adjacent scheme (to the west, bordering the eastern edge of East Challow) recently gained permission, with only localised landscape impacts highlighted; however, the site currently in question is considerably more sensitive, because it comprises the remaining landscape gap. Promoters of both sites point to the potential for detailed landscape/visual assessment work, and careful masterplanning, to ensure maintenance of a landscape gap. Promoters of the larger, northern site state: "... due to a combination of the topography of the site, existing built development and boundary vegetation and careful Masterplanning to maintain a meaningful countryside gap between East Challow and any new development, there would be no perception of amalgamation between the proposed development and East Challow..." However, **the Council's Landscape Capacity Study Addendum (2017) concludes that both sites are unsuitable in landscape terms, for example stating, in relation to the smaller, southern site that: "The site has not been reduced sufficiently to maintain the essential separation between Wantage and East Challow."**"

In the Outline planning permission ref. P16/V0652/O (HELAA site ref. EACH04) the landscape and visual impact was considered by the Council in para.s 6.27 - 6.31 of the Planning Committee report:

**"Landscape and Visual Impact**

6.27 The NPPF seeks to enhance the natural and local environment by protecting and enhancing valued landscapes (paragraph 109). Policy NE9 of the adopted Local Plan

*designates the site as part of the wider Lowland Vale which is a distinctive landscape and valued for its own quality. Paragraph 7.67 of the adopted local plan explains that “the long views over the patchwork quilt of fields, farms and villages in the Vale are an essential part of the landscape quality of the District”. Loss of the site would have a **negligible effect on the Lowland Vale landscape***

*6.28 Views across the site from the A417 are restricted by vegetation on the boundaries and the lower level of the A417 as it passes the western site boundary. **The site is not striking in any distant views. The site is most prominent from the public footpath beside the eastern and part of the northern boundary of the site.** In these views the site is seen as a large open field with a backdrop of the village. The rural character of the footpath will change and effects for users will be major. The **illustrative layout plan** seeks to reduce the effects through showing open spaces adjacent to the footpath which in turn retain the limited views to the church and a distant westwards view over part of the village towards high ground in the AONB. The localised harm to the users of the footpath needs to be considered in the planning balance.*

*6.29 Policy NE10 of the adopted local plan designates the site as part of an important open gap between settlements in this case East Challow and Wantage. I am mindful of a Court of Appeal decision<sup>1</sup> which held policies such as NE10 restrict housing and therefore, are not NPPF compliant. I give limited weight to policy NE10. Nevertheless, **coalescence of settlements remains a material consideration.***

*6.30 This site is considered to have a limited role in the open space between the settlements of East Challow and Wantage, as the site is not prominent in views of the land that forms the gap. **Land to the east plays a significant role in forming the visual gap when seen from the public footpath as does the space between the edge of Wantage and the former depot site in views from the A417.** Housing is illustrated as being separated by open space from the southern boundary of the site and in turn the A417 retains a sense of openness to the road. **It is not considered the proposal unacceptable coalesces settlements and the limited harm has to be balanced against the scheme benefits.***

*6.31 The site is outside the AONB and there is a lack of visibility between the site and AONB and vice versa. **The proposal has no impact on the setting of the AONB.***

*1 Court of Appeal case reference C1/2015/0583 & C1/2015/0894 dated 17 March 2016.”*

Site EACH06 measures 13.82ha, although the area promoted by Drivewalk Ltd measures slightly less at 13.196ha and is capable of accommodating at least 200 dwellings. A Landscape and Visual Impact Assessment to inform an illustrative layout plan demonstrates that the visual gap when seen from the public footpath and the space between the edge of Wantage and the former depot site in views from the A417 would not result in an unacceptable coalescence between Wantage and East Challow. Initially it is anticipated that about a third of the 13.196ha (4.4ha) would comprise landscaping and public open space between the A417 opposite King Alfred’s Academy and the Wilts and Berks Canal with a green footway/cycleway link.

The submitted Wantage Neighbourhood Plan 2015 – 2031 (the Neighbourhood Plan) included Policy 1: ‘A Spatial Plan for Wantage’:

*“The growth of Wantage should be contained within its defined development boundary which*

includes the provisions for major development to the North West and North East of the town as defined in LPP1 Core Policy 4.

Proposals that will lead to any further coalescence between Wantage and its neighbouring settlements will be required to **demonstrate that they:**

- i. Do not lead to the coalescence of settlements **or**
- ii. Maintain the separate identity of settlements **and**
- iii. Do not undermine the character, setting or identity of a settlement.

Proposals for development in or affecting the North Wessex Downs Area of Outstanding Natural Beauty or its setting will only be supported if they can demonstrate that they:

- iv. Will conserve and enhance the AONB landscape and in particular its special qualities, landscape character and scenic beauty, in accordance with the North Wessex Downs AONB Management Plan,
- v. Support the rural economy, and/or
- vi. Meet a specific need such as leisure or education, and
- vii. Any negative landscape and ecological impacts will be fully mitigated.”

The Landscape and Visual Impact Assessment and illustrative layout plan demonstrates that the allocation of the Land will not lead to the coalescence of Wantage and East Challow and/or will maintain their separate identity.

In a summary of the findings on page 101... *“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.**”*

LPP1 Core Policy 19: Re-opening of Grove Railway Station supports the re-opening of the railway station at Grove **“within the lifetime of the plan”**.

In order to deliver the growth in the South East Vale Sub-Area and the wider Science Vale area, LPP1 Core Policy 17 requires all development within the South East Vale Sub-Area to contribute towards the infrastructure identified within the Science Vale Area Strategy that includes the West Wantage Relief Road. LPP1 para. 5.93 “safeguards land to deliver a West Wantage Link Road (WWLR) connecting the A417 from Mably Way in Wantage to East Challow” as identified in Core Policy 18: ‘Safeguarding of Land for Transport Scheme in the South East Vale Sub-Area’ and Appendix E (page 67) and the Adopted Policies Map.

The Land is not “distant from the town centre”. Quite the contrary, the Land **within both a comfortable walking and cycling distance (within 2km and 5km respectively)** of the town centre and the premium bus service route to Oxford (with bus services already being significantly improved to Milton Park and a new/upgraded cycle link to Harwell Campus), and within a comfortable cycling distance of the new rail station at Grove.

The reason that sites ref. EACH06 and EACH07 have not been included in terms of an appraisal of its sustainability appear to be that:

(i) the SA has ‘Ruled out’ Cluster 6 West of Wantage as a whole without considering how well individual sites within Cluster 6 perform against the preferred spatial strategy; and

(ii) para. 2.114 of the LPP2 advises that whilst LPP1 made provision for less than 15% of the Part 1 allocations:

*“the Western Vale Sub-Area contains **less opportunity for strategic employment growth** than, for example, the South East Vale Sub-Area, and **may be considered less well related to Oxford** than, for example, the Abingdon-on-Thames and Oxford Fringe Sub-Area.”*

Neither reasons reflect the location of sites EACH06 and EACH07 adjoining the development boundary of Wantage, the summary appraisal findings in the West of Wantage Cluster 6 overview of which indicate that allocating sites EACH06 and EACH07 for homes in Wantage would perform well in the spatial strategy and would more appropriately meet the identified need for additional housing.

Local Plan paragraph 2.39 however allocates no additional sites within the Western Vale Sub-Area advising:

*“this area does not relate well to Oxford or Science Vale and the identified housing need for this area is already adequately planned for.”*

And Policy 4a states:

*“Western Vale Sub-Area*

*Local Plan Part 2 does not allocate additional sites within the Western Vale Sub-Area.”*

The Neighbourhood Plan Examiner’s Report of Examination 30 July 2016 recommended that the Neighbourhood Plan not proceed to referendum, the Examiner stating in para. 5.4 in relation to Policy 1: ‘A spatial plan for Wantage’ (in relation to: containing development within a defined boundary, further coalescence between Wantage and its neighbouring settlements being required to demonstrate they do not lead to the coalescence of settlements or maintain the separate identity of settlements and do not undermine the character, setting or identity of a settlement, and resisting development in the AONB) that:

*“the policy is **not supported by proportionate, robust, evidence and does not support sustainable development**. For these reasons I would therefore recommend that Policy 1 be deleted”* (para. 5.3).

The Examiner concluding that:

*“the plan is **overly focused on protection of the locality’s many features**”* (para. 15.1).

Since at least the 9 August 2016 the Council has been working closely with the town council to revise the plan so it should meet the basic conditions next time it is submitted, although at the time of writing it has yet to be progressed.

### **Conclusions:**

The site promoted by Drivewalk Ltd is slightly less than EACH06 at 13.196ha (as opposed to

13.82ha) and is capable of accommodating at least 200 dwellings. A Landscape and Visual Impact Assessment to inform an illustrative layout plan demonstrates that the visual gap when seen from the public footpath and the space between the edge of Wantage and the former depot site in views from the A417 would not result in an unacceptable coalescence between Wantage and East Challow. Initially it is anticipated that about a third of the 13.196ha (4.4ha) would be landscaping and public open space between the A417 opposite King Alfred's Academy and the Wilts and Berks Canal to maintain meaningful open land between Wantage and East Challow, joining existing footpaths/cycleways, and the new housing developments to the Northwest of Wantage, to King Alfred's Academy.

In relation to the open land between Wantage and East Challow, because of a number of landscape attributes, including the location of Wantage on higher ground and the presence of a landscape buffer (including about a third of the Land), the separate identity of East Challow would not be compromised. Rather, a meaningful gap would be maintained.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Land is a much more sustainable, unconstrained and 'reasonable alternative' site to those allocated in LPP2 Policy 4a. The Land itself has not been considered robustly in the Landscape Capacity Study March 2017 and the October 2017 Addendum, nor in the Sustainability Appraisal October 2017. It is considered that there is a strong case that the Land is a more suitable housing allocation site, that performs well against the housing strategy and settlement hierarchy in LPP1, and in a robust SA, and that in summary: (a) is not in the Green Belt (unlike the Policy 4a Dalton Barracks site); (b) does not amount to 'major development' in the AONB (unlike the Harwell Campus site); (c) would focus sustainable growth on a site that relates well to Oxford in public transport terms, and to the Science Vale area; (d) would reinforce the service centre role of this main settlement in the district in which specific policies in the Framework (footnote 9 on page 4) do not indicate development should be restricted to the West of Wantage; (e) could be developed in a way that would maintain an appreciable countryside gap between East Challow and Wantage; and (f) would assist in achieving many public benefits including the delivery of the WWRR, the Grove railway station, and a north/south footway/cycleway link to King Alfred's Academy. As such **the Land should be identified as an allocated housing site in LPP2 Core Policy 4a.**

(Continue on page 4 /expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?



**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To consider the robustness of the Sustainability Appraisal October 2017, and the resulting housing strategy in the LPP2, in omitting the Land to the West of Wantage as a 'reasonable alternative' site to those sites identified in Policy 4a.

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date: **22 November 2017**

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

I would like to be kept informed about the progress of the Local Plan



I would like to be added to the database to receive general planning updates

Please do not contact me again

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

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)