

Wantage and Grove Campaign Group



Vale of White Horse Local Plan Examination

Matter 7: Supporting infrastructure and Services:

Submission from the Wantage and Grove Campaign Group.

Core Policy 7

1. There is insufficient appropriate infrastructure to support the plan. Roads, schools, utilities, community facilities, local GP Surgeries and hospitals cannot possibly be sufficiently improved within the time-scale to 2031 to meet such great increase in demand.
 - 1.1. Paragraph 1.6 of **DLP07 Vale of White Horse District Council - Infrastructure Delivery Plan** states:
"It is essential that there is sufficient infrastructure to support growth to achieve sustainable development. One of the most common concerns residents have about accommodating development in their area is infrastructure and in particular, capacity at the school or doctors' surgery and that the transport and sewer networks cannot support further development."
 - 1.2. Paragraph 1.7 continues:
"It is important to note that this list is not exhaustive as future monitoring of the Local Plan 2031 and subsequent parts of the Local Plan 2031 (for example the Local Plan 2031 Part 2: Detailed Policies and Local Sites and Science Vale Action Plan) will highlight further needs within the district that will require investment. ..."
 - 1.3. At the same time CIL02_3 CIL Infrastructure and Funding Report makes it clear that even when all sources of funding are taken into account
"CIL will not be able to fund the entire infrastructure required across the district. The Council will need to determine how to prioritise between the different infrastructures projects" (see paragraph 4.4).
 - 1.4. These paragraphs are therefore evidence that Core Policy 7 and the associated transport policies are unsound.
2. We refer the inspector to the submission made on 19/12/14 by the Wantage and Grove Campaign Group (copy attached) and would point out that in the Wantage and Grove Area, since this plan was instigated in 2010, approval has been given for:
 - 23 homes off Newbury Street (full approval September 2012, now built and occupied)
 - 18 units on Manor Road (full approval December 2012, now built and occupied)
 - 24 flats on Wallingford Street (full approval April 2015)
 - 90 homes at Stockham Park Phase 3 (full approval February 2015)
 - 32 retirement flats on Church Street (full approval July 2015)
 - 85 homes off Chain Hill (full approval granted February 2014, now partially built and occupied)
 - 133 homes at Monks Farm phase 1 (outline approval January 2014, renewed June 2015 and RM process in progress)
 - 1,500 homes at Crab Hill (outline permission granted July 2015 – recommended for approval February 2014)

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75	homes at Monks Farm phase 2 (outline permission recommended for approval Sept 2014 - granted April 2015)
90	homes at Stockham Park Phase 2 (full approval January 2014, being built)
200	homes at Stockham Park Phase 1 (full approval November 2012, partially built and occupied)
2,500	homes at Grove Airfield (recommended for approval December 2013, S106 still not signed)
4,770	so far...
PLUS:	
198	homes approved and partially built and occupied in East Hanney
71	homes approved and mainly built and occupied in East Challow
47	homes approved and partially built and occupied in East Hendred

This is a total of 5,086 homes already in progress within the Wantage and Grove area and further applications for over 500 homes already in the pipeline. Since our submission referred to above, Local Transport Plan 4 has been published and refers to the lack of public transport and heavy reliance on the private car.

3. TRA10 LTP4 Connecting Oxfordshire Vol 1 Paragraph 31 states that:
"Within Oxfordshire's towns, bus networks are relatively under-developed, offering slow, infrequent routes that are more suited to shoppers than commuters. The quality of cycling and walking networks is variable, with some towns having had very little investment in pedestrian and cycling infrastructure. Although there is a charge for most town centre parking in district council car parks other than in West Oxfordshire, many of the trips within the towns are to workplaces with ample staff parking, edge of town retail, or schools. This means that even for internal trips, a very high proportion are still made by car."
4. In Wantage and Grove, public car parks are already close to capacity and most of the housing sites in the emerging Local Plan have not yet been started. Work places in Wantage and Grove centres have little parking and buses are limited. Schools have little parking and there are no joined up safe cycle routes for children to get to school so a VERY high proportion of journeys are made by car.
5. Paragraph 35 of LTP4 states that:
"... Like in other parts of the UK, the condition of the road network has deteriorated over recent years. This is as a result of a severe shortage of funding for maintenance, of increasing numbers of heavy vehicles using roads which were not originally designed to carry them, and successive harsh winters and flooding. For cyclists and pedestrians in particular, poor maintenance is a safety hazard and can deter people from walking and cycling. Funding levels over the last 25 years have been such that roads are able to be rebuilt approximately every 255 years on average, as opposed to the optimal 40 years."
6. Furthermore the Oxfordshire County budgetary review has proposed significant reductions in public transport from 2016, yet paragraph 4.42 of the Local Plan Part 1 states:
"4.42. Any new development increases the use of, or demand for, existing services and facilities. Where new homes or jobs are developed and there is insufficient capacity to meet additional demand it is essential that new facilities and infrastructure are provided to meet the demand created."

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7. We already have 5,086 homes already in progress within the Wantage and Grove area yet all we have seen so far in terms of improved infrastructure about a mile of resurfacing of one minor road between Wantage and Milton Interchange (along Featherbed Lane) and the expansion of one primary school in Charlton (which is full again). This is in 4-5 years. Despite the requirement of the NPPF that transport infrastructure shall be developed in parallel with the developments, and not retro fitted after completion of the development, and as extended by the Minister to cover 'travel to work' routes.
8. Schools will not be able to cope with this scale of development long before the promised new schools are built on Crab Hill and Grove Airfield (if they ever are). The plan assumes that Grove Airfield will deliver 2 primary schools and 1 secondary school and that other sites can rely on this. The site at Grove Airfield has been planned since at least 2006 and the section 106 agreement has still not been signed by at least one landowner so for the Local Plan to blindly assume that this will happen and not plan any contingency for infrastructure is unsound.
9. COM01 Leisure and Sports Facilities Study Part 1 paragraph 213 states that:
"Wantage Leisure Centre is estimated by the FPM [Facilities Planning Model] to be running at 100% full, with a throughput at community time of 46,949 visits a year. This compares to the actual throughput in 2013 - 14 of 29,205 visits to the sports hall plus 26,033 to the activity hall, giving a total throughput of around 55,325. This suggests that Wantage is running even fuller than the FPM is calculating."
10. This was first reported in the initial study in March 2013 and if the Wantage Leisure Centre was running at 100% full at peak time (when 80% is usually considered full) then no increase in usage is possible regardless of the increasing population.
11. Paragraph 4.44 of the Local Plan Part 1 states that
"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 infrastructure within appropriate timescales has been secured."
12. Yet this is not included in the wording of Core Policy 7 and cannot therefore be relied upon. Furthermore as the 5 year housing supply figures are so out of reach, paragraph 47 of the NPPF will override any requirement for infrastructure and the plan must be considered unsound on these grounds.
13. The Vale is predominantly a dormitory area for commuters to Oxford, Swindon, Reading, Newbury and London. There is no certainty that the level of housing proposed will not reinforce that travel pattern of commuting and therefore further increase the need for rail access, further improvements to the A34 and other main trunk routes as well as any improvements to more eco-friendly routes such as public transport or cycling. The low salaries of scientists despite their high skills means that, as now, many employees in scientific research would be unable to afford to buy the proposed new dwellings and would be inward commuters.
14. The Vale appears to be relying on CIL funding to provide the necessary infrastructure. However the infrastructure needs to be provided in anticipation of the proposed developments. Even the employment is heavily reliant on the infrastructure being in place to attract the companies and staff to the area. If the developments do not come forward on the timescale adopted by the Vale there will be a serious funding shortfall. The Plan implicitly acknowledges this fact when in paragraph 4.18 it states that:
"4.18. It is the jobs being created in Science Vale that generate the need for a significant

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proportion of the houses required in the district. The majority (almost 75%) of our strategic housing growth is allocated within close proximity to these key Science Vale business locations. Our plans for significantly enhancing and delivering new infrastructure are also focused on the Science Vale area to enable our growth potential to be realised. This infrastructure cannot currently be delivered without the planned housing."

Core Policy 17

15. As stated in paragraph 5.96 of LPP1

"Without investment in the identified infrastructure, the growth in the Science Vale area would be unsustainable and be put at risk. For this reason, Core Policy 17 sets out the requirement for all strategic growth within the sub-area to contribute towards strategic highway infrastructure."

16. The policy requires the identified highways infrastructure to mitigate the impact of the planned growth across Science Vale and secure the future economic viability of the area. Yet the funding from CIL and Section 106 developments in the area will not be sufficient to pay for this in addition to the other basic infrastructure required by any residential community such as capacity at the school or doctors' surgery and the basic utilities of water, electricity, gas, waste, telephone and broadband networks.

17. Yet paragraph 5.98 continues:

"In addition to the infrastructure identified within the Science Vale Area Strategy there is an existing requirement for a development road to serve the Local Plan 2011 allocation at Grove Airfield. This is known as the Grove Northern Link Road (GNLR) and is required to provide access to the Grove Airfield site from the A338. It does not form part of the Science Vale Area Strategy and will be provided in association with the Saved Local Plan 2011 allocation at Grove Airfield and the new strategic allocation at Monks Farm ..."

The GNLR is not specifically included in any policy in the Plan.

18. Core Policy 17 (Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area) is unsound because it does not prove that the improvements will be effective at coping with the scale of housing development proposed in the Plan. It does not specifically include the GNLR which is required to stop the traffic moving north from the 2500 homes on the Grove Airfield development through the Conservation area in the centre of the village to the A338.
19. Core Policy 17 is also unsound as it provides no certainty that the A34 will continue to function as a major strategic Route. Paragraphs 6.67 – 6.72 on A34 Strategy, leading to Core Policy 34, state that it is likely that by 2030 congestion along the A34 will take place more frequently, including outside peak hours. This is consistent with traffic modelling of development scenarios carried out by OCC which show that at peak times the A34 is constrained by being at full capacity, yet there is no certainty that the A34 can in the future *"function as a major strategic route thereby reducing consequential congestion on the local road network"* (CP34).
20. To quote from the Oxfordshire Local Economic Partnership's SEP:
'Oxfordshire currently suffers from capacity issues exacerbated by in-commuting. These in turn create constraints to economic productivity and growth in the county. The A34 and A40, in the heart of Oxfordshire, suffer from poor journey times that will prove a significant constraint as the economy grows. The delays caused by congestion are a cost borne by businesses and can lead to less productive employees. These (and other) capacity restrictions limit business efficiency and investment, and the ability for communities to access the full range of services'
21. No traffic modelling appears to have been done to demonstrate that all residents of the Vale, including all those in the proposed housing will have appropriate and timely access to hospitals.

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This ranges from public transport access for those without cars to rapid access within the “golden hour” for emergencies such as heart attacks.

Core Policy 18

22. Please see the response from W M Wasborough (Mark Richards) [**Mr & Mrs W M Wasborough (ID: 874656)**] proposing an alternative route for the Wantage Western Relief Road. As it points out – the proposed route for the link road does not take account of important issues such as land ownership or topography and so in its current state is unlikely to be deliverable. It proposes an alternate route which may be more acceptable to all parties.
23. As the Grove Northern Link Road (GNLR) is not specifically mentioned in Policy 17 we have no confidence that the land required will be safeguarded by policy 18. This policy is therefore unsound.

Core Policy 19

24. The protected area on the Policy Map for Grove Station, does not clearly include all the area covered by the station in the past and will not provide sufficient land to be safeguarded for either a transport interchange or public carpark, therefore the safeguarding is unsound and should be expanded to provide sufficient area for the necessary infrastructure to support a reopened station.

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Part B – Please use a separate sheet for each representation

Name or Organisation : Wantage and Grove Campaign Group

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

Paragraph

Policy

Core Policy 7: Providing Supporting Infrastructure and Services

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Local Plan 2031 Part 1 states that

Paragraph 4.40. “Successful infrastructure delivery is important to ensure the wider aims of this strategy can be met. These include delivering sustainable growth across the Vale.”

Paragraph 4.41. “Infrastructure can cover a range of services and facilities. These can include:

- physical and transport infrastructure such as roads, bus services, water, drainage, waste management, sewage treatment and utility services
- social infrastructure such as education, health facilities, social services, emergency services and other community facilities such as libraries and cemeteries, and

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- Green Infrastructure such as parks, allotments, footpaths, play areas and natural and amenity green space.”

The NPPF (paragraph 8) states that “to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.”

According to the plan approximately 25% of the homes will be built in or around Wantage and Grove. We outline the infrastructure plans below:

Local Plan 2031 Part 1 states that

Paragraph 5.92. “The main focus of these improvements is to ensure that there are efficient and effective transport linkages between the major Science Vale employment sites (as well as those within the Science Transit Arc) and the planned housing growth allowing for strategic public transport and road access to the area. The package includes improvements to the cycle and public transport network within, and to, the area, as well as necessary upgrades to roads and road junctions to allow for growth.”

This paragraph is incorrect. Objectives may be being developed and investigated but none will deliver “efficient and effective” transport links between Wantage and the employment centres of the Science Vale.

Cycle Routes, Roads and Bus Services

(Vale of White Horse Evaluation of Transport Impacts)

<http://www.whitehorsedc.gov.uk/sites/default/files/2014%20Final%20ETI%20Report.pdf>

Cycling

Para 7.6.2. To provide an attractive, sustainable and safe alternative to driving within the Science Vale Area, a substantial upgrade and expansion of the cycle network is required. The forthcoming Oxfordshire Cycling Strategy (as part of Local Transport Plan 4) will aim to get more people cycling. This will be through a series of measures including route audits, better publicity, better integration with bus and rail and the establishment of 'Cycling Premium Routes'.

Public Transport:

Para 7.6.9. Specific public transport schemes and objectives that are being developed and investigated include:

Safeguarding and protecting the ability to deliver a station at Grove to ensure the future longer term ambition of connecting Wantage and Grove with Didcot, Swindon and beyond can be achieved.

Promote a strategic bus route between Grove, Wantage, Milton Park and Didcot. (illustrated at 2 buses per hour)

Para 7.6.11. In addition to standalone pedestrian, cycle or public transport schemes, sustainable travel improvements are being included in other schemes. For example as part of improvements along the A417 corridor, Oxfordshire County Council has been working with the Parishes between Wantage and Blewbury along this route to identify ways to improve safety, and address the conflict between the volume of traffic and access to the villages. This study importantly includes measures to improve the environment for pedestrians and cyclists, for example by introducing crossings to access bus stops, providing new pedestrian and cycle facilities along its length between Wantage and Blewbury and providing consistent speed limits.

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Other issues:

Para 7.7.3. In the morning peak the A417 is forecast to be operating at or above operational capacity in the eastbound direction between Wantage and Featherbed Lane. In the evening peak the A417 is operating at or above operation capacity in the westbound direction between Featherbed Lane and Wantage. Delays are forecast to be in the order of ten minutes along this five mile route. The A417 Corridor Study is currently being progressed in discussion with the Parish Council's along its route. It will investigate these issues and it is expected that the public transport and smarter choices strategy will at least increase the people moving capacity of this corridor.

All the plans are for studies and investigations – there are no specific plans to improve the A417 between Wantage and Featherbed Lane, to provide funding for bus services, to re-open Grove Station or to do anything except preserve the land for the Wantage Western Relief Road. The land required for the Grove Northern Relief Road (clearly identified in earlier drafts of the Local Plan, has disappeared completely from the plan. No comprehensive plan of cycle route improvements is proposed and no agreement has been made with the County Council for funding of any transport improvements.

No mention is made of any infrastructure funding or infrastructure planning for the re-opening of Grove station even though the Report by Network Rail, referenced in paragraph 5.104. of the Local Plan 2031 part 1 states clearly that there is a positive business case for this happening and identified the reopening

of Grove Station as being within the top five best business cases for opening a new station across the whole of the UK.. See page 9 of

http://www.atoc.org/clientfiles/files/publicationsdocuments/ConnectingCommunitiesReport_S10.pdf

Research carried out by the District Council has demonstrated that 5,500 new homes means 9,314 jobs and 6,986 people driving to work from Wantage and Grove mainly along the A417 to the Science Park - except where people take the back roads though Steventon and along the Newbury Road. See

<http://www.whitehorsedc.gov.uk/sites/default/files/Analysis%20of%20travel%20patterns.pdf>

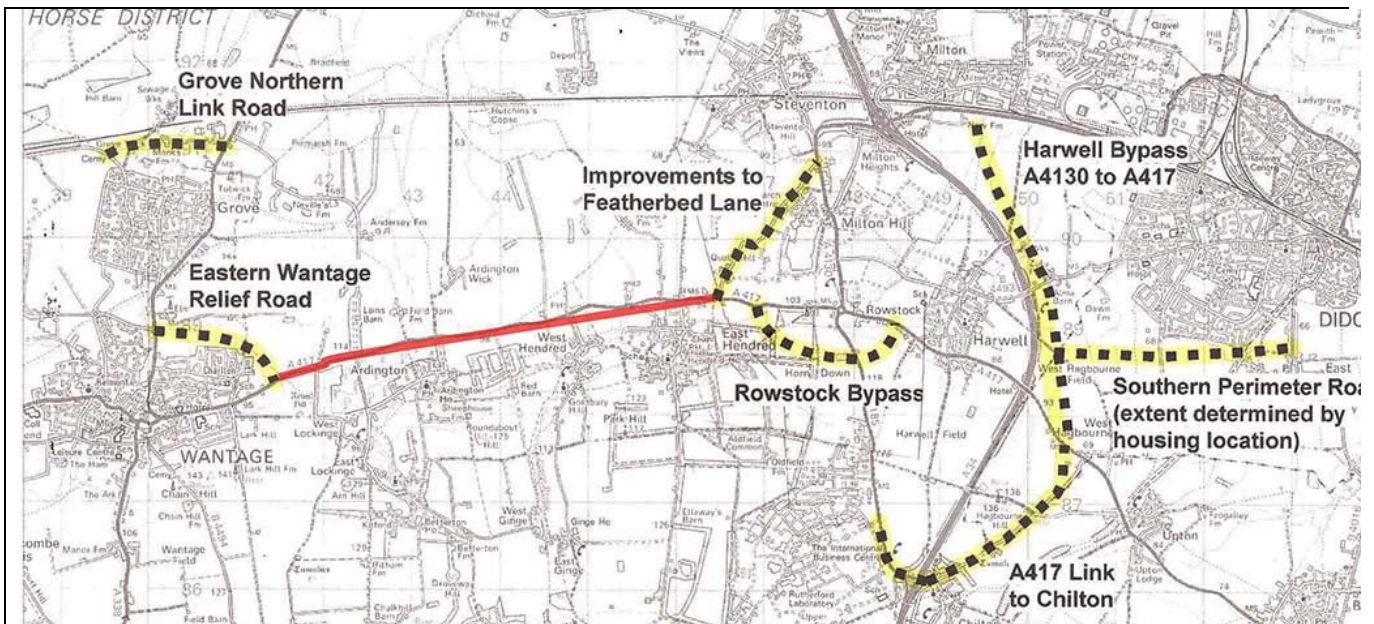
Also in the rural parts of the Vale, bus services are not sufficient to provide an alternative to the car. As a consequence, car ownership is relatively high within the district and continues to form the main mode of transport. Average car ownership per household in the district has risen from 1.41 in 2001 to 1.5 in 2011. This is above the national average but also above the average for Oxfordshire, which in 2011 was 1.38.

The District Council expect that most of the jobs will be in Harwell Oxford or Milton Park so most of the traffic increase is likely to be along the A417 from Wantage towards the A34. The Highways Department have stated that this road is already close to capacity but the Local Transport Plan 2011-2030 (<http://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/transportpoliciesandplans/localtransportplan/ltp3/17-svuk.pdf>) makes limited suggestions for improvement to the A338 and no improvements to the A417 except to the Rowstock and Featherbed Lane junctions. No improvements are planned for the A417 between Wantage and Featherbed Lane (marked in red on the map below).

There will be new roads required within the developments, which could include a link road from the A338 to the A417 through Crab Hill (Eastern Wantage Relief Road), and a road round the Airfield development (Grove Northern Link Road). The Eastern Relief Road is included in the Infrastructure plan but no mention is made of the Northern Link Road.

The increase in traffic will impact all the surrounding villages as well as Wantage and Grove.

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See the [Oxfordshire County Council Local Transport Plan](#). The above image is taken from OCC SCOTS Final Report, October 2008 Figs 4 and 5 between pages 32 and 33. The red line has been added to highlight our main concern. As the plan states:

"Access to the area is constrained by river crossings and the North Wessex Downs. The inter-urban routes are served by highway links that are not built to current standards and are thus subject to speed limits lower than the National Speed Limit. (para 17.4)

... The strategically important local roads located within the Science Vale UK area are the A338, A4130, A417 and A4185 and they provide vital north-south and east-west links between Didcot, Wantage & Grove and the employment sites. Traffic growth in the area is generally higher than the national average and, as a sign of the areas growing success, some key gateway locations are already experiencing congestion. ...(para 17.8)

By 2026, approximately 13,000 dwellings and 12,000 additional jobs are planned for the Science Vale UK area. This represents a significant challenge in terms of delivering the transport infrastructure to support the planned growth. (para 17.15)

The increase in housing numbers (and subsequent increase in car ownership) will cause added pressure to the road network system in general within Science Vale UK with the increased car use for journeys in and out of the area, travel to and from employment and travel to and from the schools. (para 17.29)"

Traffic concerns mean that the potential for at least 8500 extra cars in Wantage and Grove with only limited improvements to existing roads. There is no sound infrastructure planning for any improvements to roads, cycle routes or bus services along the A417 between Wantage and Featherbed Lane for the current and future residents of Wantage and Grove.

Water, Drainage, Waste management, and Sewage treatment

(Vale of White Horse District Council - Water Cycle Study)

<http://www.whitehorsedc.gov.uk/sites/default/files/2013s7594%20-%20Vale%20of%20White%20Horse%20District%20Council%20-%20Water%20Cycl.pdf>

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4.1.4 Conclusions

Table 4-3: Water resource summary

Settlement	Assessment
All settlements	Insufficient evidence to confirm that the planned increase in demand can be met.

4.1.10 Conclusions

Table 4-5: Water supply and distribution summary

Settlements	Assessment
Settlements in Faringdon FMZ: Coxwells Craven Faringdon Longworth Shrivenham Stanford	Cannot accommodate all proposed site allocations. Further modelling will be required and subsequent upgrades may be needed.
Settlements in the Wantage FMZ: Challow Charlton Grove Hanneys Hendreds Wantage	
All other settlements	Can accommodate the proposed site allocation without upgrades

5.4.4 Conclusions

Table 5-11: Water quality summary

WwTW	Assessment
Abingdon	Proposed growth can be accommodated. No class deterioration or deterioration >10% is predicted.
Drayton, Faringdon, Kingston Bagpuize, Stanford-in-the-Vale, Wantage.	WwTW upgrade is likely to be required but the calculated future consent is within the capabilities of Best Available Technology.
Appleton, Didcot, Oxford, Shrivenham	WwTW upgrade is likely to be required and the calculated future consent will exceed the capabilities of Best Available Technology. Preventing deterioration is therefore likely to require the addition of high capital and operation cost drinking water treatment processes" is replaced with "Preventing deterioration may not be possible without long distance transfers of wastewater or development of new wastewater treatment technologies.

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5.1.4 Conclusions

Table 5-1: Sewerage system summary

TWUL Site ID	Site Name	Waste Response
37041	East Harwell Oxford Campus	Cannot accommodate all proposed site allocation. Further modelling will be required and subsequent upgrades may be needed
32573	East of Coxwell Road, Faringdon	
37039	East Sutton Courtenay	
41813	Great Coxwell Parish, South Faringdon	
41244	Harwell and Milton Parishes east of the A34 adjoining Didcot Town, Valley Park	
20581	Kingston Bagpuize East	
21181	Land at Crab Hill, Land north of A417 of A338, Wantage	
38647	Land East of East Hanney	
39920	Land South of Park Road Faringdon SN7 7PL	
34616	Land West of Harwell	
39900	Milton Parish west of the A34, Milton Heights	
36172	Monks Farm, Grove	
38536	North Abingdon-on-Thames	

2013s7594 - Vale of White Horse District Council - Water Cycle Study Phase I Study v1-2 FINAL

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TWUL Site ID	Site Name	Waste Response
41240	North Shrivenham	Cannot accommodate all proposed site allocation. Further modelling will be required and subsequent upgrades may be needed
37016	North West Abingdon-on-Thames	
37054	North West of Harwell Oxford Campus	
37023	North West Radley	
39908	North West Valley Park - Site 11	
38093-	South Kennington	
	ALL OTHER SITES	Not assessed

Given that, of those sites assessed none have been identified as having spare sewerage network capacity, it is recommended that the same situation would prevail at all other sites until proven otherwise.

There is no sound infrastructure planning for Water, Drainage, Waste management, and Sewage treatment in the Vale.

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Social infrastructure such as education, health facilities, social services, emergency services and other community facilities such as libraries and cemeteries

The plan does include provision for some new primary and secondary schools on major development sites such as Crab Hill and Grove Airfield but the timing of delivery has not been agreed and there is no evidence that the timing will take account of other sites being developed within the catchment areas.

In the Infrastructure Delivery Plan

http://www.whitehorsedc.gov.uk/sites/default/files/2014_10_07%20IDP%20final.pdf

Para 11.3 NHS England and the CCGs are unable to provide the information Vale requested concerning infrastructure at the time of writing. Health providers acknowledge Vale of White House District Council will be promoting growth in the district and as stakeholders would welcome involvement in providing the necessary health care services. The council welcomes working with healthcare providers to identify infrastructure capacity issues. Further co-operation will continue for partnership working to accommodate growth in the district.

12.0 Emergency Services

Para 12.1 In preparing the IDP, the council contacted Thames Valley Police and the South Central Ambulance Service. Thames Valley Police responded that, given the timescales involved, it would be difficult to be specific about what infrastructure would be required to support the growth. However, they indicated that on the larger schemes an on-site presence would be required such as a neighbourhood office as part of a community hub.

Para 12.2 South Central Ambulance Service did not respond.

Para 12.3 Oxfordshire County Council is the fire and rescue authority for the area. They will seek contributions towards new/improved fire stations/engines and/or the relocation of existing fire stations where this is deemed necessary due to the proposed growth.

There is no sound infrastructure planning for health and emergency services.

Green Infrastructure such as parks, allotments, footpaths, play areas and natural and amenity green space.

Local Plan 2031 Part 1 states that:

Paragraph 5.106. "The sub-area contains many areas important for their environmental or landscape value. These include the Letcombe Brook, a green corridor, which provides informal recreation, amenity and wildlife value and is an important flood management feature. Other land between East Challow and Wantage and Wantage and Grove helps to preserve the separate and unique identities of these communities and so it is important these areas are protected from development."

Yet in the past two years (while this plan has been in consultation) the planners at the District Council have approved 290 homes in the gap between Wantage, East Challow and Grove and are currently looking favourably at a further 90 homes. We hear rumours that they are also considering building a new leisure centre in this land which will also fill the gap. So this and subsequent paragraphs are not worth the paper that they are written on.

In the Infrastructure Delivery Plan

http://www.whitehorsedc.gov.uk/sites/default/files/2014_10_07%20IDP%20final.pdf

Para 10.2 The council is in the process of commissioning an update to the strategy that relates to:

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Allotments;

Amenity green spaces that are regularly used for recreation by the community, for example recreation grounds, village greens

Children's play areas (NEAP, LEAP);

Multi-use games areas (MUGAs);

Community and village halls;

Formal outdoor sports pitches for football, cricket, rugby, hockey, etc.

The requirement for contributions towards such facilities will be updated as and when the evidence base becomes available.

Para 10.3 The council is also in the process of commissioning a joint Green Infrastructure Strategy with South Oxfordshire District Council, which will give information about any on-site provision or off-site financial contributions required and the IDP will be updated as a result.

There is no sound infrastructure planning for footpaths, play areas and natural and amenity green space.

The Vale has also produced a report which gives details of the facilities in the towns and villages in the Vale.

http://www.whitehorsedc.gov.uk/sites/default/files/Town%20and%20Village%20Facilities%20Study%20Feb%202014%20Update_0.pdf

But this study makes no attempt to assess the current state and capacity of the facilities or the impact that the Local Plan may have on the use of the facilities.

We therefore believe that the plan does not meet the criterion of being "Effective" as we must be able to foresee that the policies and proposals in the Local Plan can actually happen and are deliverable. It should therefore include;

Sound infrastructure delivery planning

Delivery partners are on board and signed up

Furthermore the NPPF requires plans to identify and coordinate development requirements, including the provision of infrastructure. The Plan identifies infrastructure requirements in its nominated sites, but offers inadequate assurance that they will be carried out in a timely and coordinated way. Indeed, at a Vale public meeting on the Housing Supply Update, Spring 2014, a senior councillor accepted explicitly that infrastructure would follow rather than accompany development and that there was a risk that this would lead to some degradation of services.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

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Further work should be performed to gain agreement, complete the necessary studies and gain full commitment from delivery partners to the infrastructure required to meet the requirements of the NPPF to achieve sustainable development, economic, social and environmental gains jointly and simultaneously through the planning system.

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

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 answer any questions that the Inspector may have about the current state of infrastructure in the Vale

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

Signature:

Date:

19/12/2014

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Part B – Please use a separate sheet for each representation

Name or Organisation : Wantage and Grove Campaign Group

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

Paragraph Policy

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	X
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

The NPPF states that

157. Crucially, Local Plans should:

plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;

177. It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.

Wantage and Grove Campaign Group - continued

The Communities and Local Government Committee report on the Operation of the National Planning Policy Framework <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf>

16. The NPPF states that part of the planning system's role in ensuring development is sustainable includes "identifying and co-ordinating development requirements, including the provision of infrastructure". ...

We recommend that the Government issue guidance reminding local authorities and the Planning Inspectorate of the importance of timely infrastructure provision to delivering sustainable development

Paragraph 6.1 of the Infrastructure Funding Report

<http://www.whitehorsedc.gov.uk/sites/default/files/Infrastructure%20Funding%20Report.pdf> produced by the Vale of the White Horse District Council states:

"CIL will play an important role in the delivery of infrastructure within Vale and will account for approximately 20% of the total essential infrastructure to deliver the Local Plan Part 1. With anticipated CIL revenue of approximately £78m (over the period of the Local Plan), there will remain a shortfall in funding (c.£119m) that will need to be found from other sources, e.g. the council's capital programme or Government grants, whose funding has yet to be determined."

Therefore, such infrastructure developments as are planned are not funded, and accordingly there is no reasonable prospect that the planned infrastructure can be delivered in a timely fashion. The plan must be unsound.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

Funding sources for the timely delivery of the infrastructure required to support the developments must be identified before the development policies can be agreed.

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

Yes, I wish to participate at the oral examination

Wantage and Grove Campaign Group - continued

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

To answer any questions that the Inspector may have about the recommendation above.

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

Signature:

Date:

19/12/2014