

**VoWH LPP2 EIP - Statement for Matter 6 for
David Wilson Homes (Southern)
Tulwick Park, Grove**

June 2018

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Client

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Our reference

DAVR3005

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1. Introduction

- 1.1 This Statement is submitted on behalf of David Wilson Homes (Southern) (hereafter referred to as DWS) in relation to Matter 1 (Duty to Co-operate and other legal requirements) of the Vale of White Horse Local Plan Part 2 (LPP2) Examination.
- 1.2 DWS is promoting land to the east of Grove (hereafter referred to as land at Tulwick Park, Grove) for development, more details of which are contained at **Appendices 1 and 2** of the Turley Statement on behalf of DWS on Matter 1. Further information is provided in earlier representations submitted on behalf of DWS. The site extends from the railway line at its northern boundary to Tulwick Lane at its southern boundary. The A338 is located to the west. Grove Park Drive passes through the site.
- 1.3 This land was promoted by DWS at the LPP2 Preferred Options stage earlier in 2017 as 'Land at Grove Park, Grove'. Comprehensive representations, supported by a suite of technical documents, including a Vision Document and a report prepared by Turley entitled "Sustainability Appraisal" were submitted in November 2017 at the Local Plan Publication stage.
- 1.4 Those earlier representations provide a detailed justification as to the reasons why land at Tulwick Park, Grove should be allocated and as such that explanation is not repeated in these Statements.
- 1.5 Since that LPP2 Preferred Options stage, DWS has engaged with Grove Parish Council, Wantage Town Council, Network Rail and Stagecoach and has undertaken its own research to inform the proposals for the site.
- 1.6 The land promoted by DWS extends to 47.4 hectares and the site is capable of delivering:
 - Up to 600 homes (as part of a phased development);
 - Typical housing mix consisting of detached, semi-detached and terraced family homes;
 - The creation of land for employment uses;
 - A community hub which would provide a building in use class D1 which could provide a for a range of community uses, such as a medical facility as well as local retail opportunities to serve the residential and employment uses;
 - A park and ride facility;
 - A 1 form of entry primary school (which could be extended to 2 forms of entry);
 - Other non-residential uses include playing pitches, play areas and a productive landscape;

- The delivery of road, pedestrian and cycle access between the A338 and an area of land which would be safeguarded for the delivery of the reopened Grove railway station; and
 - Safeguarded land for delivery of the reopened Grove railway station, helping to facilitate this long term aspiration through the delivery of new infrastructure and improved access.
- 1.7 This site is not dependent upon the prior delivery of any adjacent sites which must come forward before it is delivered and is not reliant upon any other schemes in order for necessary accesses to be provided. This
- 1.8 The representations submitted on behalf of DWS explain how the land at Tulwick Park, Grove can help to facilitate the delivery of long supported infrastructure in the area, namely the reopening of Grove railway station. However it is important to note that DWS consider that this site is a sustainable location for new development whether or not the station is reopened during the Plan period to 2031.
- 1.9 On the day (22nd November 2017 of the representations being submitted to the Local Plan Part 2 Publication Version), the Autumn Budget was announced to Parliament. The Budget included reference to the Government having “agreed an ambitious Housing Deal with Oxfordshire to deliver 100,000 homes by 2031.” In addition, the Budget sets out the commitment to “The biggest rail programme since Victorian times.”
- 1.10 This Statement on Matter 1 should be read alongside other Statements submitted by Turley on behalf of DWS, namely in relation to Matters 1, 3, 5 (addressing question 5.8) and 8.
- 1.11 Each of the Statements submitted by Turley on behalf of DWS is made on the basis that:
- Evidence presented on behalf of DWS demonstrates that there will be a significant shortfall against housing requirements and expected supply throughout the District, including within the South East Vale Sub-Area and the Science Vale Ring Fence Area.
 - The VoWH has sought to reduce the requirement in the South East Vale Sub-Area to 12,150 (from 12,450). The VoWH has not explained the justification for this amendment. DWS maintains that the requirement in the South East Vale Sub-Area should be a minimum of 12,450 dwellings.
 - The LPP1 seeks to deliver 600 dwellings in the South East Vale Sub-Area outside of the Science Vale Ring Fence Area which are unlikely to be achieved due to the Policy constraints of that area and the presence of a made Neighbourhood Plan at the only settlement of note (Blewbury) which does not allocate sites for housing.
 - At Grove, the Grove Airfield and Monks Farm LPP1 allocations are likely to deliver significantly fewer dwellings than expected by the VoWH during the Plan

period. In particular, each of these sites is dependent upon the Grove Northern Link Road to deliver the quantum of development expected by the VoWH.

- There is significant uncertainty regarding the delivery of the North West Grove LPP2 proposed allocation during the Plan period.
- There is a compelling and demonstrable need to allocate additional or alternative sites to meet housing needs within the District and the South East Vale Sub-Area and Science Vale Ring Fence Area.
- Land at Tulwick Park, Grove has been discounted by the VoWH in favour of North West Grove, however the reasons for that conclusion cannot be substantiated. This is particularly the case given the uncertainty regarding the deliverability of North West Grove.
- Land at Tulwick Park, Grove can make a deliverable and sustainable contribution to housing supply. It is not constrained by the need to first deliver other adjacent or nearby sites or the delivery of off-site infrastructure. It is at a sustainable settlement and within an area where the VoWH seeks to focus growth given the emphasis on the economic significance of Science Vale. This applies whether or not land is safeguarded for reopening of Grove Railway Station east of the A338.
- Tulwick Park, Grove could be allocated in addition to North West Grove.
- The LPP2 identifies land safeguarded for the reopening of Grove Railway Station. The Statements for DWS set out concerns in relation to the delivery of a station within the proposed safeguarded areas. To restrict the opportunities for the location of this station at this time would result in a Plan which is inflexible and unable to respond to changing circumstances if evidence subsequently indicates that the station should be located elsewhere.

2. Response to Matter 6: South East Vale Sub Area

6.1 Other than Harwell Campus (Matter 7), is the housing allocation listed in Policy 15a at Grove the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Is the estimate of site capacity justified? Is the expected timescale for development realistic? Are the site development template requirements – both general and site specific - justified?

- 2.1 Policy 15a of the LPP2 proposes to allocate land at North West Grove for 400 dwellings.
- 2.2 For the reasons explained in the representations submitted by Turley on behalf of DWS on the LPP2 Publication Version, this allocation is considered to be flawed and is not deliverable during the Plan period.
- 2.3 We consider that the deliverability of the scheme is one of the key considerations as this has consequences over whether the proposed allocation is the most appropriate when considered against the reasonable alternatives.
- 2.4 In contrast to the above, the land at Tulwick Park, Grove is capable of delivering sustainable development during the Plan period, whether or not the reopened Grove Railway Station is to the east or west of the A338.
- 2.5 In fact, DWS consider that Tulwick Park could be allocated in addition to North West Grove.
- 2.6 In addition, we note that the Turley Statements on Matter 3 and Matter 5 (including the Turley Housing Land Supply Statement) set out substantial concerns regarding the achievability of the housing requirements in the South East Vale Sub-Area.
- 2.7 In fact, as these Statements demonstrate, we have significant concerns regarding the deliverability of the housing requirement in the District and within the South East Vale Sub-Area. We consider that additional or alternative sites should be allocated in order to provide greater certainty that these requirements can be achieved. In particular, the Turley Statements on behalf of DWS set out concerns regarding deliverability of specific sites in the South East Vale Sub-Area, including at Grove. This is particularly important in the Science Vale Ring Fence area which is a regionally important focus for growth and the crux of the Council's spatial strategy.
- 2.8 These Statements demonstrate that there is significant concern regarding other allocations elsewhere in the District.
- 2.9 Accordingly we consider that there is a pressing need to allocate additional or alternative sites in order to achieve requirements in this important part of the District. The failure to do so could undermine housing delivery in the area and thus its economic prosperity.

Deliverability

- 2.10 Our other Statements to this Examination question the deliverability of the North West Grove allocation. In our view, the deliverability of North West Grove cannot be considered in isolation and must be considered in the context of other development and allocations in the area (namely Grove Airfield and Monks Farm) and the delivery of the Grove Northern Link Road (GNLR).
- 2.11 The North West Grove allocation is located immediately to the north of the Grove Airfield site which was allocated in the Local LPP1 for 2,500 dwellings to be delivered by 2031.
- 2.12 To the north of the North West Grove site is Denchworth Road which is a narrow single track lane.
- 2.13 Beyond Denchworth Road is the LPP1 allocation at Monks Farm.
- 2.14 The quantum of housing likely to be delivered from the Grove Airfield and Monks Farm site during the Plan period is considered in our Statement to Matter 8.

Monks Farm

- 2.15 The delivery of the Monks Farm allocation is critical to the delivery of the GNLR.
- 2.16 The eastern part of the Monks Farm site is subject to a number of planning permissions and approvals as shown below:

Reference	Description	Status
P14/V0576/O	Outline permission for development of up to 75 dwellings	Granted 2 nd April 2015
P15/V0783/O	Outline planning consent for residential development of up to 133 dwellings with associated access.	Granted on 13 th August 2015
P15/V1722/O	Residential development for up to 160 dwellings (use class C3) together with direct access off Station Road (A338); landscaping and public open space; drainage infrastructure inclusive of flood compensation works; and biodiversity enhancements(as amended by submitted documentation 9 November 2015)	Granted on 24 th August 2015

- 2.17 The remainder of the Monks Farm allocation is subject to application P16/V0981/O which was submitted in April 2016 and sought outline planning permission for up to 400 dwellings, extension to the Grove CE primary school and other associated works. That application is still undetermined. The Site Location Plan and an updated Application Development Framework Plan submitted during the course of the application being determined is contained at **Appendix 1** of this Statement.
- 2.18 Application P16/V0981/O primarily relates to land on the western side of the allocation. **Appendix 1** demonstrates that the site includes land between the proposed residential development and the A338 which will crucially form the GNLR.
- 2.19 **Appendix 1** also demonstrates that there is a strip of land between the boundary of application P16/V0981/O and Denchworth Road as is shown below:



Figure 2.1: Application P16/V0981/O Application Development Framework Plan, Savills

- 2.20 Although the material submitted with application P16/V0981/O shows the route of the GNLR within its site boundaries, and in this strip of land between the application site and Denchworth Road (in order to connect with a road from North West Grove), no information has been provided over the deliverability of that part of the road.

- 2.21 In addition, we note that Oxfordshire County Council's latest response (22nd February 2018) on application P16/V0981/O stipulates that:

"Prior to the occupation of the 150th dwelling forming part of the development hereby permitted a vehicular access link between the spine road within the development and Denchworth Road shall have been completed and suitable for bus operation. This could either take the form of the Grove Northern Link Road (GNLR) connecting to Denchworth Road, coupled with a widening of a section of Denchworth Road or, if this is not achievable, an access link to the wider section of Denchworth Road near to the junction with Maples Close."

- 2.22 It appears as though the County Council acknowledges the complexities of connecting the GNLR from the P16/V0981/O application site to Denchworth Road given that it is willing to accept an alternative means of access.

- 2.23 A letter (dated 29th November 2017) (contained at **Appendix 2**) submitted on behalf of the applicants for application P16/V0981/O addresses the matter of the GNLR connection to Denchworth Road and states:

"The wider framework plan submitted with the original application for this site identifies a strategic link road that joins the consented access at the A338 (which has already been delivered by Bellway) through the application site to Denchworth Road, linking the access from Grove Airfield. Gallagher Gleeson does not control land to the west of the application area which is required in order to provide the remainder of the link road that will connect this site directly to the Grove Airfield access (LPA ref: P12/V0299/O)."

- 2.24 As the Turley Statement to Matter 8 on behalf of DWS demonstrates, the deliverable supply from Monks Farm during the Plan period should be significantly reduced.

Grove Airfield

- 2.25 The Grove Airfield site is subject to a permission (P12/V0299/O) granted in July 2017 for residential development of about 2,500 dwellings with associated services and facilities including secondary school, primary schools, local centre (including uses falling within use classes A1, A2, A3, A4, A5, B1, C2, D1 and D2).
- 2.26 The outline application for Grove Airfield was submitted by Persimmon Homes and Taylor Wimpey. It is understood that Taylor Wimpey are no longer involved with the site and that Persimmon controls land only for the delivery of 1,500 dwellings.
- 2.27 The delivery of this development is, in part, contingent upon the delivery of the GNLR. Part of the site includes land within the North West Grove site (proposed for allocation in the LPP2) which is intended to form part of the GNLR and connect with Denchworth Road. This part of the application site is to provide the 'northern spur road'.
- 2.28 Condition 30 of the Grove Airfield permission states that:

"No more than 1,500 dwellings shall be occupied before the Northern Link Road, linking the northern spur road and the A338 has been constructed and made available for use"

in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority.”

- 2.29 In short, the Grove Airfield site must connect from its northern edge, cross the North West Grove proposed allocation and pass through Monks Farm in order to connect to the A338 (with that route constructed and made available for use) before the 1,501st dwelling is occupied at Grove Airfield.
- 2.30 The LPP2 itself (paragraph 2.100) explains that the North West Grove *“site will not come forward until towards the end of the plan period and much closer to 2031.”* This is supported by the Statement of Common Ground between the LPA and Persimmon (SCG06) which sets out that:
- The North West Grove site will assist with delivering the North Grove Link Road [the GNLR] between Grove Airfield and the A338; and
 - The site will deliver houses between the period 2028 – 2031.
- 2.31 DWS consider that the agreed position between the LPA and Persimmon that the North West Grove site will *“assist with delivering the North Grove Link Road”* is likely to indicate that the stretch of the GNLR which crosses the North West Grove site is likely to be delivered as part of that development.
- 2.32 Should that be the case then it indicates that no more than 1,500 dwellings will be occupied at Grove Airfield until the North West Grove site progresses and delivers the stretch of the GNLR within that site.
- 2.33 As the Turley Statement to Matter 8 on behalf of DWS demonstrates, the deliverable supply from Grove Airfield during the Plan period should be significantly reduced.

North West Grove

- 2.34 As explained above, North West Grove is proposed to be allocated for 400 homes and the LPP2 and Statement of Common Ground between the LPA and Persimmon (SCG06) envisage that the development will come forwards towards the end of the Plan period (2028 onwards). The Statement of Common Ground also explains that the North West Grove site will *“assist with delivering the North Grove Link Road”* and DWS interpret that to indicate that the stretch of the GNLR which crosses the North West Grove site is likely to be delivered as part of that development.
- 2.35 DWS consider that if development does occur at North West Grove, then it is reasonable to assume that it should be reliant upon similar infrastructure requirements as the Grove Airfield scheme. For example, if the delivery of the Airfield is subject to the completion of the GNLR to the A338, then North West Grove should be subject to similar restrictions given its quantum of development and location between the Airfield and Monks Farm. As is explained in the other Statements submitted by Turley on behalf of DWS, there is significant uncertainty regarding the completion of the GNLR between Grove Airfield and the A338 and as a consequence, we consider that there should be significant uncertainty regarding the deliverability of North West Grove during the Plan period.

- 2.36 The initial reserved matters submitted in relation to the Grove Airfield site indicates the development will be phased from south to north on that site. This suggests that a connection into North West Grove is unlikely to be delivered early in the construction period. Whilst it is acknowledged that the submission material includes plans that indicate Denchworth Road could be enhanced prior to the GNLr being delivered, it should be noted that these do not include provision for an emergency access in accordance with the normal requirements of OCC. Until such a time that this has been shown, it is considered that the initial response that OCC issued with respect to the Monks Farm application (P16/V0981/O) remains; namely, Denchworth Road is able to serve approximately 150 dwellings.
- 2.37 Furthermore DWS understand that Persimmon only controls land at Grove Airfield for 1,500 dwellings and therefore would not need the connection through North West Grove to deliver that development.
- 2.38 As the Turley Statement to Matter 8 on behalf of DWS demonstrates, the deliverable supply from North West Grove during the Plan period should be significantly reduced.

Tulwick Park

- 2.39 Land to the east of Grove (Tulwick Park) has been promoted by DWS for the development described in section 1 of this Statement.
- 2.40 This site does not rely on large scale highways infrastructure (such as the GNLr) in order to facilitate its delivery and it does not rely on any other sites being developed by others. The development at this site can be delivered unencumbered by such constraints and there are no reasons why it could not be delivered during the Plan period.

Summary on Delivery

- 2.41 On the basis of these comments, we note that:
- The ability to deliver the GNLr from Denchworth Road into Monks Farm is highly questionable and not within the site boundary for application P16/V0981/O;
 - The delivery of any more than 1,500 dwellings at Grove Airfield is reliant upon:
 - The road being delivered through North West Grove;
 - The delivery of the road crossing the strip of land between Denchworth Road and the boundary of application P16/V0981/O;
 - The delivery of the road throughout the remainder of the Monks Farm site and the phasing of development being delivered on that site in general; and
 - The delivery of North West Grove is particularly uncertain for the reasons explained above.

- 2.42 For the reasons explained above, North West Grove is not considered to represent a realistic or deliverable site which can be relied upon during the Plan period to 2031. Whilst it may progress at some point in the future, it is reliant upon access solutions and the delivery of highways infrastructure, both of which are extremely questionable.
- 2.43 In order to be 'sound' paragraph 182 of the Framework requires that Local Plans be "deliverable over its period". As explained in this Statement and elsewhere on behalf of DWS, the North West Grove site is not deliverable over the Plan period.

Is North West Grove the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 2.44 In responding to this element of question 6.1, we consider that two points are relevant: i) is North West Grove a reasonable alternative and ii) regardless of whether it is a reasonable alternative has the site been shown to be the most appropriate.

Is North West Grove a Reasonable Alternative?

- 2.45 The PPG defines reasonable alternatives as (Paragraph: 018 Reference ID: 11-018-20140306):

"The sustainability appraisal needs to compare all reasonable alternatives including the preferred approach and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted.

The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.

The sustainability appraisal should identify, describe and evaluate the likely significant effects on environmental, economic and social factors using the evidence base. Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.

The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).

Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the

preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.

The development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals (when preparing a Local Plan, paragraph 152 of the National Planning Policy Framework should be considered).” Our emphasis

- 2.46 Clearly, the Planning Practice Guidance establishes a requirement that reasonable alternatives must be realistic and deliverable.
- 2.47 With regards to the deliverability of housing at North West Grove, the SA has identified that delivery is ‘uncertain’ therefore demonstrating that North West Grove does not constitute a reasonable alternative to deliver housing at Grove. This concern is wholly supported by the earlier representations submitted by Turley and the Statements to this Examination on behalf of DWS.
- 2.48 For the reasons explained above, North West Grove is not realistic and deliverable within the Plan period and should therefore not be considered as a reasonable alternative.

Is North West Grove the most appropriate?

- 2.49 To a degree, DWS consider that this is a moot point as fundamental issues have been raised regarding the deliverability of this scheme. If a scheme is undeliverable it should not be included in the Plan.
- 2.50 The LPA’s Sustainability Appraisal (CSD09) and the assessment of the sites therein has been undertaken qualitatively without the use of the traditional scoring matrices which presents some difficulties for the reader in identifying and comparing the sustainability performance of each reasonable alternative against each specific objective.
- 2.51 Furthermore, as explained in our Statement for Matter 1, it appears as though the LPA’s Sustainability Appraisal does not refer to the correct site boundary for Tulwick Park (east of Grove) despite indicating that the decision to assess this site was as a result of representations submitted to the Preferred Options Consultation. Such an error is concerning given that the site areas and resulting constraints and opportunities (and therefore SA assessments) will be significantly different between the two sites.
- 2.52 As such it cannot be said that the Sustainability Appraisal demonstrates that North West Grove is the most appropriate solution as it does not allow this comparison to be undertaken.
- 2.53 The LPA’s Sustainability Appraisal Report (CSD09) identifies the following reasons for rejection of Land at Tulwick Park as a reasonable alternative for residential development:
- The site would not deliver the same strategic benefits as North West Grove;
 - The site is sequentially less preferable to North West Grove; and

- Allocation of more than one site in Grove through LPP2 would result in over allocation and not be deliverable.
- 2.54 Other than contributing part of the GNLR (although the delivery of that part of the road by 2031 is particularly uncertain), it is unclear what strategic benefits the North West Grove scheme is expected to deliver when compared to Tulwick Park. As explained in Section 1 of this Statement, the proposal at Tulwick Park is for a comprehensive mixed use scheme.
- 2.55 Following a review of the SA, the rejection of Land at Tulwick Park as a sustainable option for residential development appears to be based upon the belief the site would not deliver the same strategic benefits as North West Grove in combination with an inability of the local market to deliver more than one site at Grove.
- 2.56 The LPA's Sustainability Appraisal claims that North West Grove is "sequentially more preferable". The SA does not provide details to support this claim although it may be derived from the statement on page 99 that *"the Northwest of Grove site contains one notable area with the potential for pooling of surface water (high probability). The East of Grove site contains several small areas with the potential for pooling of surface water. This part of the district is also associated with high groundwater flood risk."* If the conclusion is that Tulwick Park is sequentially less preferable for this reason then we consider that it is a flawed analysis as it appears to be based upon the larger site area which has been used to inform the Council's site assessments.
- 2.57 With regards to North West Grove the reasons for selection over Land at Tulwick Park would appear to be based upon its ability to deliver strategic transportation benefits and an increase in the potential for the site to deliver housing over the plan period. As explained, the delivery of North West Grove during the Plan period is highly questionable.
- 2.58 We have not seen any evidence to support the contention that more than one site could not be delivered at Grove. One of the reasons why Tulwick Park appears to have been discounted in favour of North West Grove is the concern that *"allocation of more than one larger site in the Wantage/Grove area, through LPP2, would result in over-allocation (and would not be deliverable)."* Our contention on behalf of DWS is that it is the North West Grove site which is not deliverable whereas there are no reasons why Tulwick Park would be undeliverable.
- 2.59 The representations to the LPP2 Publication Version on behalf of DWS were supported by a Sustainability Appraisal undertaken by Turley which demonstrated that Tulwick Park is a sustainable option for development. The findings of that analysis are not repeated here, however the scheme was found to have strong sustainability benefits against the following SA Objectives:
- Homes
 - Services and facilities
 - Movement

- Health
 - Economy
- 2.60 The SA has also concluded that there are no sustainability impacts that would prevent its allocation and subsequent delivery as a sustainable location for residential led development.
- 2.61 We consider that Tulwick Park is the most appropriate solution for development at Grove because:
- The site is a sustainable option in its own right as demonstrated by the material submitted by DWS;
 - The LPA's reasons for discounting the site are unfounded; (the site would not deliver the same strategic benefits as North West Grove; and
 - The site is deliverable in clear contrast to North West Grove.

Summary

- 2.62 There are significant concerns regarding the deliverability of housing to achieve requirements in the South East Vale Sub-Area. DWS consider that additional or alternative sites should be allocated in order to establish that these requirements can be achieved. The land at Tulwick Park, Grove offers a sustainable opportunity to delivery such development.

6.6 Are the proposals to extend the safeguarded land for reopening Grove Railway Station justified? Would there be any adverse impacts?

- 2.63 As with its previous representations, DWS is supportive of the longstanding aspiration to re-open Grove Railway Station given the strategic benefits this will have from a transport sustainability perspective. Indeed, DWS consider that it is essential that the LPP2 acknowledge that the reopening of Grove railway station will contribute to enhancing the accessibility of Science Vale by rail as envisaged by paragraph 5.73 of the LPP1 given that it fulfils the objectives in paragraphs 5.90- 5.93 of the LPP1 by virtue of:
- It helps to deliver sustainable transport options, allowing easy access between homes, employment and facilities;
 - It helps contribute towards a package of infrastructure which includes improvements to public transport; and
 - It helps to ensure that there are efficient and effective transport linkages between the major Science Vale employment sites and the planned housing growth.

- 2.64 On this basis, the emerging masterplan for the Tulwick Park site continues to safeguard land that could be used in the future to accommodate a station together with a circa 400 space car park despite the fact that current version of the LPP2 has excluded land that was previously safeguarded to the east of the A338.
- 2.65 Despite the abovementioned support, DWS considers that there are inherent and substantial flaws in the areas to be identified as safeguarded land.
- 2.66 Notwithstanding the above points, DWS consider that Tulwick Park is a realistic, deliverable and sustainable option for development regardless of whether Grove Railway Station is reopened and regardless of whether this is located east of the A338.
- 2.67 On the basis of information contained within Topic Paper 5, it would appear that this decision has been reached following the “outcome of recent study work to assess the most suitable site for a new station at Grove” (Topic Paper 5, paragraph 5.4). For reasons that are unclear to DWS, the study that is referred to in Topic Paper 5 does not provide part of the evidence base. This is troubling given the importance that has been placed on the re-opening of Grove Railway Station by both VoWH and OCC (its Rail Strategy refers). It is also contrary to the approach that has been taken with respect to other studies referred to in Topic Paper, which are listed in the Evidence Base; namely, the Evaluation of Transport Impacts Study prepared by Atkins on behalf of OCC and Sustainable Transport Study prepared by Systra on behalf of VoWH.
- 2.68 Whilst the study referred to in the Topic Paper has not been uploaded to the LPP2 Evidence Base, DWS has obtained a copy from both VoWH and OCC following a Freedom of Information request. Having reviewed this document, it would appear that the author (SLC Rail) has not taken into account that any new station on the Great Western Mainline between Royal Wootton Bassett and Didcot is incumbent upon the provision of additional track capacity.
- 2.69 Having explored the principal of a new station on this strategically important section of the national rail network with Network Rail, it is very clear that there will be a need for a substantial upgrade in the current infrastructure, including that which SLC Rail appears to have concluded to be a limiting factor in providing a station to the east of the A338, before any new stations can be provided. This is due to current capacity restrictions and the adverse effect that the introduction of a new station will have upon the overall benefits that have been realised via the electrification of the Great Western Mainline.
- 2.70 Against this background, DWS is concerned that the conclusion to exclude the previously safeguarded land located to the east of the A338 is unsound. This is particularly evident given that the information that has been referred to when identifying the areas of land that are contained within Appendix B of LPP2 is far from convincing. Indeed, it is clear that the layouts provided at **Appendices 3 and 4** of this Statement are subject to constraints that bring into question the overall viability of Grove Railway Station ever being re-opened. For example:

‘Wantage – Site C’

2.71 The location and design of the access shown on Fereday Pollard Drawing 365 LD (01) 001 Rev 02 (see **Appendix 3**) is contrary to the requirements of the Design Manual for Roads and Bridges. From a vehicular access perspective these include:

- Achievable forward visibility on the southern approach being restricted by the level differences associated with the realigned A338 road bridge;
- Visibility from the site access is not being consistent with the current 50 miles per hour speed limit of the A338;
- Inadequate deflection being provided on the A338 northern and southern approaches; and,
- The kerb radii not being consistent with acceptable limits, which will restrict the ability of buses to access the station safely.

2.72 Given that any of the above would result in a potentially unsafe access in isolation, their cumulative impacts are such that it is highly unlikely that OCC would approve such a junction. Moreover, the final bullet point will not be looked upon favourably by bus operators and will bring into question the ability to provide an effective public transport interchange. On these grounds alone, locating a station in this location should be discounted.

2.73 However, this option is also subject to severe limitations from a pedestrian/cycle access perspective that will have an overall negative impact upon the ability of existing and future residents of Grove walking or cycling to the site. For example:

- The absence of a footway would require pedestrians to walk in the road when travelling to/from the new access road. Given the substandard visibility that has been shown at the roundabout, it is clear that pedestrians walking in the road would presents a significant safety concern.
- Due to land ownership constraints it is not possible to access the station from the south of the A338 bridge. This results in excessive walk distances from the main residential areas of Grove.
- As shown below, land ownership constraints appear to preclude the ability to deliver the lift/stairs that are shown providing access to the southern platform.

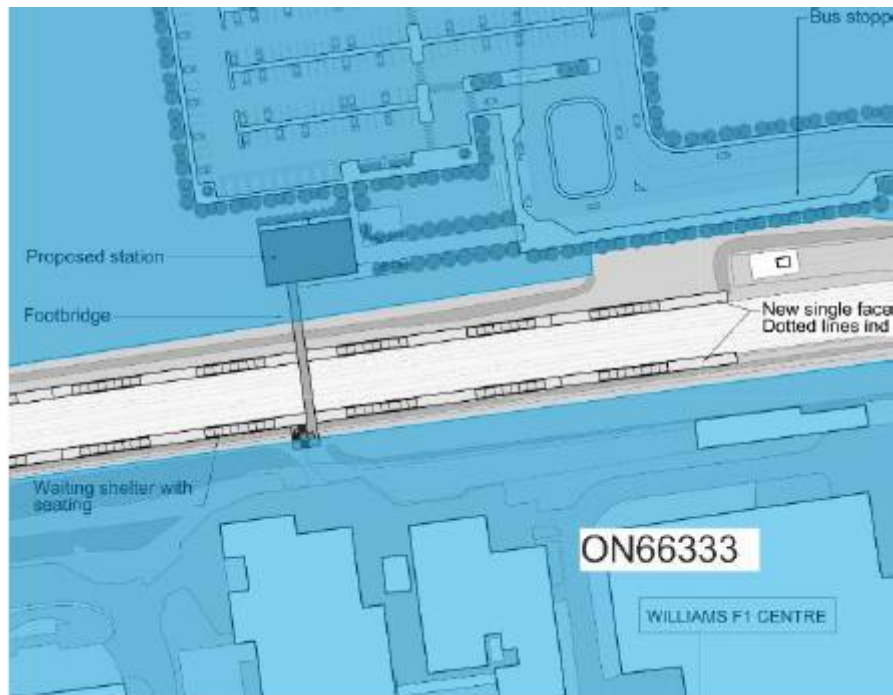


Figure 2.2: Wantage Site C Ownership Constraint

- 2.74 Each of the above observations are contrary to the objectives outlined in paragraphs 5.90 – 5.93 of the LPP1 in so much as this site does not facilitate easy access between homes, employment and facilities or provide effective and efficient transport linkages. Indeed, its location to the north of the Great Western Mainline effectively isolates this from the community it is intended to serve. Not only will this result in a station in this location being ‘car dependent’, it would also be separated from the settlement.
- 2.75 Notwithstanding the above, the design has an impact on an existing attenuation pond. The earthworks that would be required to construct a roundabout in this location will reduce its capacity, and there will thus be a need to mitigate this effect using land that is not controlled by any third parties. This has not been demonstrated to date.
- 2.76 It is also noted that the Fereday Pollard drawing makes reference to the potential for future development being provided adjacent to the station. Notwithstanding the access limitations that have been identified above, the potential for any development to the north of the Great Western Mainline would be located beyond the railway line which the Council’s own evidence base identifies as a barrier and would lead to development in a rural location without a functional relationship with Grove.

Wantage – Site F

- 2.77 This design shown on Fereday Pollard drawing 365 LD (01) 008 Rev 02 at **Appendix 4** is broadly situated on the same area of land that was safeguarded in Appendix B of LPP1. In this regard, it is subject to the same limitations that DWS has made in its previous representations. For example:

- The distance between this site and Station Road is likely to be considered too much of a detour for drivers of vehicles travelling along the A338 as part of a longer distance commute.

- The fact that the detour would involve travelling along Denchworth Road, which is a single lane carriageway in part, until the GNLR is delivered as part of the Monks Farm development (assuming this is delivered), is also likely to deter people from using this station.
- Pedestrian access is currently achieved via a footway that is located to the south of Denchworth Road. This is unlit and passes through open countryside, and is thus unlikely to be seen as a viable route for many pedestrians. Whilst it is accepted there are proposals and committed developments that have the potential to address these points in the future, the deliverability issues outlined above mean they should not be relied upon when siting this strategically important piece of infrastructure.
- Current bus access is limited to an hourly frequency service along Bererton Drive and Denchworth Road to the east of Brerton Drive.
- Due to the single carriageway of Denchworth Road, bus operators will not consider this a viable route to the proposed public transport interchange. Whilst it is acknowledged a more substantial road is shown on Fereday Pollard Drawing 365 LD (01) 008 Rev 02, this is subject to the same deliverability issues identified with respect to the GNLR and cannot be relied on to provide an appropriate bus route to this location.

2.78 As with the station shown to the north of the Great Western Mainline, it is thus clear that providing a station in this location would be contrary to the objectives outlined in paragraphs 5.90 – 5.93 of the LPP1. Indeed, it is clear that the above will deter people from travelling to this site in order to access future train services. As this will have an overall negative impact upon the business case for re-opening Grove Railway Station, DWS consider that the inclusion of this site at the expense of Tulwick Park severely restricts the ability of a station from ever being realised.

2.79 Notwithstanding the above, it should also be noted that the design shown at **Appendix 4** utilises land that falls outside the proposed North West Grove site allocation. It is unclear if the layout provided at **Appendix 4** would be reliant on more than one landowner. In the absence of any information that clarifies this point, the same concerns raised with respect to the deliverability of the GNLR also apply to a station in this location.

Adverse Impacts

2.80 For the reasons outlined above, it is DWS view that the areas of land that are currently safeguarded for the re-opening of Grove station are contrary to the objectives outlined in paragraphs 5.90 – 5.93 of the LPP1. Indeed, it is clear that reliance upon the safeguarded areas of land identified by VoWH in LPP2 brings into question the ability of a station ever being delivered in this location.

2.81 As has been shown in representations made by DWS to date, the provision of a station at Grove would make a significant contribution towards achieving the travel behaviour changes set out in the current Local Transport Plan and thereby reducing vehicular activity at the more congested junctions located to the north of Grove. For example, it has been shown that circa 22% of people that currently commute from the

Wantage/Grove area travel to destinations that could be reached using trains that operate along the Great Western Main Line and Cherwell Valley Line.

- 2.82 In the context of the capacity constraints that LPP1 identifies with respect to the A338 to the north of Grove, DWS therefore contends that it is essential the safeguarded land is not subject to any land ownership and/or technical constraints that would preclude the delivery of this important piece of transport infrastructure. If this was indeed found to be the case, it is likely that current planned, committed and future growth would place an increased burden upon the A338, and in particular several sensitive junctions located to the north of Grove.
- 2.83 Given the above shows the safeguarded land is subject to both, DWS argue that the strategy being pursued by VoWH will have a negative impact upon the operation of the highway network. Not only does this bring into question the ability of VoWH to deliver the growth expected as part of LPP2, it has wider ramifications for the ability of VoWH to meet any future growth identified in subsequent Plans.

Tulwick Park

- 2.84 In stark contrast to the above, the area of land being that is shown as being safeguarded on the emerging Tulwick Park masterplan:
- Is controlled by a single landowner and is thus available and deliverable.
 - Can be accessed directly from the A338 via the creation of a fourth arm off the existing F1 Williams Roundabout, which is not subject to any safety or capacity limitations.
 - Is surrounded by a range of uses that will increase the overall viability of a station as it will cater for both 'outbound' and 'inbound' commuter trips, including those that are currently associated with the F1 Williams Centre.
 - Is supported by a proposed Park and Ride station, which will ensure that the station is readily accessible by a range of transport modes.
- 2.85 It is therefore clear that the Tulwick Park site can play an important role in meeting the County's aims of reducing reliance upon the private car. Indeed, it should be noted that Stagecoach has confirmed that:
- Tulwick Park is the only area of Grove that has access to all of the bus services that currently link this area of the Science Vale with Abingdon and Oxford;
 - Tulwick Park is well located to serve existing and future residents by either walking or cycling;
 - A Tulwick Park Park and Ride offers the potential to encourage mode shift before drivers exiting Grove reach the more congested sections of the A338 to the north, as well as the main routes into and out of Oxford; and,

- A Tulwick Park Park and Ride will help to catalyse patronage growth, which in turn will facilitate the future frequency improvements that are shown on Figures 5.6c of LPP1.

2.86 Not only are the above points aligned with the objectives outlined in paragraphs 5.90 – 5.93 of the LPP1, it is clear that the Tulwick Park site is well placed to deliver the step change in travel behaviour that underpins the overall aims of the current iteration of the OCC Local Transport Plan. This is particularly evident given that DWS has previously highlighted 22% of existing residents of the Wantage/Grove area work in locations that could be reached using trains that currently operate along the Great Western main line and Cherwell Valley line, and that the following Table shows there is an existing demand for the destinations that are served by the bus routes that currently travel along the A338.

Route	Destination	Percentage of all trips
58	Abingdon	9.3%
	Oxford	3.5%
S9	Oxford City	4.3%
	VoWH (A420 Corridor)	1.4%
Total		18.5%

2.87 It is therefore clear that Tulwick Park, by virtue of its location, will play an essential role from a transportation perspective in the future growth of both Grove and the Science Vale more widely. DWS therefore contends that the cumulative benefits associated with the safeguarded station land and proposed Park and Ride provide a further justification for its inclusion in the emerging Local Plan as an allocated site.

Summary of Response to Core Policy 19a

2.88 DWS consider that a reopened station at Grove should be located to the east of the A338.

2.89 The revised identification of the safeguarded land under Policy CP19a is unsound since it fails the requirement at paragraph 182 of the Framework that Plans should be:

- **Justified** - there appears to be no formal assessment within the SA of the reasonable alternatives to deliver the safeguarded land for the re-opening of Grove railway station despite it being a policy (Core Policy 19a) within the LPP2. A number of sites have been considered as 'reasonable alternatives' for the delivery of the new railway station and therefore these should be reported within the SA along with reasons for their selection or rejection. As such it cannot be demonstrated that the plan would be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

- **Effective** – for the reasons explained above, there are various reasons why the proposed reopening of Grove railway station within the land to be safeguarded may not be deliverable.

2.90 In order to make the Plan sound, DWS consider that the LPP2 should continue to identify the land to the east of the A338 as a potential location for the reopened Grove Railway Station. To restrict the opportunities for the location of this station at this time would result in a Plan which is inflexible and unable to respond to changing circumstances if evidence subsequently indicates that the station should be located elsewhere. In any event, the comments above on behalf of DWS provide a clear explanation as to why the land which is currently proposed to be safeguarded will not be appropriate.

2.91 The land at Tulwick Park allows the infrastructure such as access roads to the station to be provided as part of the development proposed by DWS. The masterplan for this site has been designed to accommodate that infrastructure and retain land safeguarded for the station itself. Accordingly, this approach provides the land for the access, and the access itself without recourse to public expenditure. This contrasts with the options which are proposed in the LPP2 where it cannot be certain that the land to provide relevant accesses or the land for the station itself could be secured, does not conflict with existing allocations, and where the provision of infrastructure would likely to be at a cost to the public purse.

Appendix 1: Monks Farm Application Drawings

Appendix 2: Agent's Letter on Monks Farm Application

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