

Paragraph 1.27, page 13

Soundness: This is not in compliance with the statement of community involvement.

Comment: Publication Version (1) of the Emerging Local Plan published in October 2017 had a very different strategy to this Publication Version (2). In the earlier version the number of homes planned for the plan period was considerably less and no homes were planned the edge of Oxford. The community has not had the opportunity to comment on or meaningfully influence the direction of the plan on these matters.

This is contrary to the aspiration of the statement of community involvement.

Policy STRAT 5, Page 41

Soundness: This is not compliant with the statement of community involvement as no consultation took place before this policy was introduced. It has not been positively prepared or justified and it is not in compliance with national policy

Comment: It is clear that this is not a well thought out policy, and it is not justified. In the case of Wallingford, two large estates have outline planning permission (Site B) /resolution to grant planning (Site E) for 1,057 dwellings. The effect of this policy will be to increase the number of dwellings on these two sites to over 1,700. However, Table 5d on page 90 makes it explicit that Wallingford has no outstanding requirement to provide any further dwellings in the plan period as completions and commitments from 2011 all ready exceed its allocation by 38% (361 dwellings) (based on 15% growth since 2011). The policy therefore conflicts with Policy H3, as it would result in an overprovision of housing in Wallingford, Henley and Thame.

Wallingford notes with sadness the intent of policy STRAT1 to support us by providing new infrastructure, yet nowhere in the Emerging Local Plan is there any evidence of any new planned provision of infrastructure. Indeed the Sport and Leisure Strategy being submitted alongside the Emerging Local Plan barely gives the town a mention. This paving of the road to Hell ignores the fact that Wallingford already suffers from a deficit of local infrastructure:

- The doctors surgery has a patient doctor ratio of over 1240 to 1 and is at capacity. It operates from a site that SODC has advised (pre-planning advice) cannot be expanded. Oxfordshire CCG is now objecting to new major development in the surgery's catchment area.
- Based on National Policy and Sport England guidance, Wallingford has inadequate sports and leisure provision for the existing population, however the Sport and Leisure Strategy makes no provision for any further facilities in Wallingford.
- The secondary school is already over-subscribed. It has plans to increase by 20 teaching places, but this will not meet both the existing unmet need and future need based on housing already planned in its catchment area.

If this policy is retained, the residents of the additional dwellings will not be able to register at the surgery, nor have access to adequate sport and leisure facilities, nor will their children be able to be educated in Wallingford. On these grounds alone, the policy is not sustainable. The policy therefore is in conflict with Objective 4 (provision of essential infrastructure), Objective 6.2 (provide access to high quality leisure, recreation, cultural, community and health facilities), Objective 6.3 (ensure all communities have access to the services and facilities they value, supporting access to sport and recreation and the health and wellbeing of everyone)

This is a blanket policy that does not take into account local character or need. It therefore conflicts with Objective 5.2 (support development that respects the scale and character of our towns and villages, enhancing the special character of our historic settlements), and Objective 7.2 (conserve and enhance our rich and varied historic assets and their settings, celebrating these as some of our strongest attributes).

This policy is highly prescriptive and effectively removes from Neighbourhood Development Plans the flexibility of local residents to decide how their neighbourhoods develop. As such it conflicts with Objective 6.1 (champion neighbourhood planning, empowering local communities to direct development within their area and provide support to ensure Neighbourhood Development Plans are deliverable, achievable and sustainable).

In terms of employment, this policy will, in the case of Wallingford, conflict with Objective 3.2 – in 2011 (the last census) in Wallingford, Cholsey and Crowmarsh, there was a rough balance between the numbers of people in employment and the number of jobs. With the growth in dwellings since then, there is no longer a balance and it will get worse at Sites B and E are developed. Under this policy, numbers on Sites B and E will increase giving rise to greater levels of out-commuting.

The evidence for this policy sits within Appendix 2 of the Housing Topic Paper. No definition of net and gross densities has been provided to understand the implications of this policy better. It appears that the net densities in the examples used have been calculated using just the houses and gardens in fairly small example areas, contrary to accepted practice of including local roads, off-street parking areas, amenity spaces and play spaces. However, no plans have been included to explicitly show the areas over which the example densities have been calculated. Without this it is not possible to see how the comparator densities have been arrived at and whether they are realistic given the character of the area. The evidence offered is therefore prejudicially misleading and therefore the policy is not positively prepared or justified.

The policy over-rides policy DES8, which states in 1 part 1) the efficient use of land, with densities of at least 30 dwellings per hectare, taking account of local circumstances including protection of the local environment, access to local services and facilities and local character. Proposals which seek to

deliver higher quality and higher density development which minimises land take will be encouraged.

In our opinion, SRAT 5 should be deleted in its entirety and the Local Plan should instead rely solely on DES8, which is proportionate and overcomes most of our objections.

Policy TC 5, page 219, Appendix 13 page 289

Soundness: This is not compliant with the statement of community involvement as no consultation took place before this policy was introduced.

Comment: Wallingford disagrees with the definition of our primary shopping area, which is not consistent with what has been developed for the Wallingford Neighbourhood Development Plan;

- the Primary Shopping Area as detailed in the Appendix 13 does not reflect the extent of the town centre;
- there are substantial A1,A2, A3 and A5 commercial spaces missing from the plan;
- it is crucial that these spaces are recognised and protected from Permitted Development to B or C use classes;
- shops, restaurants and cafes, high street professional services and hot food outlets are essential to the vitality of Wallingford;
- they are main footfall drivers in the town centre; and
- they help to meet community need and contribute to the sustainability of the town centre

Our definition of the primary shopping area has been sent separately to SODC, however it is copied below, with the missing areas coloured orange.

