

# Wallingford Neighbourhood Plan Steering Group

## Responses to the Examiner's Clarification Note of 2<sup>nd</sup> October, 2020

23<sup>rd</sup> October 2020

The Wallingford Neighbourhood Plan (WNP) Steering Group, on behalf of Wallingford Town Council, wishes to thank the Examiner for his recognition of the work which has gone in to preparing our Plan, and for the opportunity to respond to points of clarification. Wallingford Town Council, at its meeting of Full Council on 26<sup>th</sup> October, 2020 has endorsed this response.

Our responses to these questions are given below.

Attached at the end of this document are two appendices which we would like the examiner to consider for inclusion in the Plan as we feel these constitute a significant evidence base which addresses many of the more significant points given by responses to the Regulation 16 consultation:

- An appendix giving evidence for the allocation of the Local Green Spaces – this was completed prior to the consultation but was omitted in error from the main Plan document. It has been updated with very recent evidence in relation to the Wilding Road application for registration as a Town Green.
- An appendix summarising the major infrastructure requirements in Wallingford. The inspector at the recent examination of the SODC Local Plan commented that he expects that NDPs should define the infrastructure requirements in their areas and we therefore take this opportunity to reiterate the needs of Wallingford which residents have repeatedly commented on throughout the Plan process, even though they sit outside of an NDPs ability to directly influence. This topic also touches upon questions from the WNP examiner and others around the validity of the WNP to reference CIL and infrastructure needs.

We also thank the Examiner for the opportunity to comment on the representations made to the Plan – our comments are included here.

Finally, we extend our gratitude to the Examiner and SODC for their clear commitment in enabling the Plan to proceed towards adoption despite the challenges created both by the ongoing processes around the Local Plan, and the disruption cause by the COVID-19 pandemic.

Cllr Lee Upcraft  
Chair of the Wallingford Neighbourhood Plan Steering Group

# Responses to the Examiners Questions

## **Policy WS1**

*This policy reads more as a strategic statement or vision rather than a policy.*

*Please can the Town Council explain its purpose and the way in which it is intended to provide the clarity required by the NPPF?*

The steering group has developed a vision and set of objectives for the neighbourhood plan. Policy WS1 interprets these clearly and unambiguously as a local framework policy for the parish, what we expect to happen in the town, why and in general terms how this should happen. It provides more detail to support the Local Plan policies, in particular WAL 1.

Such a policy provides a clear overview of the principle issues in Wallingford for residents, developers and decision makers. The policy sets out in positive terms how proposals in the neighbourhood plan area should be considered. It is our view that this is important and relevant information to include in a policy in the same way that Local Plan Policy STRAT 1 does in the local plan for the whole district. It will add positive strength to the neighbourhood plan in the determination of development proposals.

The policy conforms with paragraph 16 of the NPPF and with the practice guidance for neighbourhood plans at paragraphs 001 and 004.

## **Policy WS4**

*The policy criteria have a negative tone. I am minded to recommend modifications to the criteria so that they are positively-worded. The overall effect of the policy would, however, remain unchanged.*

*Does the Town Council have any comments on this proposition?*

We agree and propose the following

WS4.1 Within the built up area of Wallingford development proposals will be supported provided that:-

- (a) an existing important, recreation or educational facility or open space, or space of ecological or environmental value is not lost; and
- (b) there is no adverse impact on the landscape setting of the town, site and its surroundings including the setting of the adjacent AONB's; and
- (c) it does not result in a poor quality environment for those who live and work in the area, including through noise and disturbance

*Note clause (d) has been removed in recognition of SODC's comments relating to duplication of policies with respect to HA1.*

**Policy HA1**

*Is HA1 2(c) a land use policy?*

No – we are content for the clause to be removed.

**Policy HA3**

*Has the Town Council undertaken an assessment of the continued importance of the views and vistas in the Conservation Area Appraisal?*

*The current policy requires the reader to access a separate document. Should the identified views be identified on a map within the neighbourhood plan?*

We have not undertaken our own assessment – we feel that the SODC work of 2018 remains valid. We were previously advised to avoid replicating data which could be referenced elsewhere, but we are happy to include this important resource directly and have obtained SODC’s permission to replicate the map. We will include it in the final Plan document.

**Policy HA4**

*Does the policy have regard to the Community Infrastructure Levy regulations?*

*In particular would there be any direct and functional relationship between the development of Site E /Site B/other sites of 10 or more houses and the restoration of buildings at risk elsewhere in the town?*

We feel this is compatible with the CIL regulations (para 122). See below

Necessary to make development acceptable	Increasing the amount of development in and around the town will impose increasing amounts of pressure on the towns limited infrastructure and facilities including the historic environment. The SEA suggests that a higher number of homes is less sustainable than the number proposed in the plan, it is important that if higher numbers of homes are permitted that extra measures are taken to boost necessary infrastructure and to look after our valued historic places.
Directly related to development	The buildings at risk, quoted in WNP para 4.5.2 are all in public places in the town, the Kinecroft, Bullcroft and Castle grounds, all are used extensively for recreation and leisure activities, including walking, junior football, enjoyment of historic environment and special community events. Almost all residents in the town will make use of these spaces for recreation and are likely to increase pressure on, and damage to, these nationally important heritage assets.
Fairly and reasonably related to the development	The historic environment in Wallingford is one reason why many people choose to live in the town. Any contributions sought will be fairly related to the scale of the development.

This proposal in policy HA4 accords with para 202 of the NPPF, the policy only seeks to secure contributions from housing schemes which would increase the number of homes in the town over and above the existing committed level which is already significantly in excess of the number proposed in the ELP. Helping to secure the repair and long-term future of these at risk heritage assets could outweigh harm from increasing the number of homes in the town and the increased harm to heritage that may cause.

### **Policy EE2**

*The policy is affected by the September 2020 changes to the Use Classes Order. I am minded to recommend modifications to the policy to ensure that it has regard to national policy.*

*Does the Town Council have any observations on this proposition? In particular does it have any comments on the way in which the new Order impacts on the purpose of the policy?*

*Does the Town Council have any detailed comments on the District Council's updates on this issue as discussed at the recent Local Plan hearings?*

We believe it is still relevant to protect employment on the specified sites in order to retain local employment and services in Wallingford, there are a wide variety of uses in the employment areas some of which would not be good neighbours for residential homes. We do not believe that it would be helpful to limit uses to B2 and B8 only as there are many uses within the old B1 use class in the employment areas and these form an important element of employment provision. The town centre will no longer be protected from competition from out of town shops and retail warehouse units, the impact of this on the vitality of the town centre will need to be monitored. Our understanding of the use classes order is that uses on the employment areas would now include those in the new class E. We suggest the wording of EE2.1 is altered to reflect the use class change to:

Hithercroft Industrial Estate and Ayres Yard, shown on the Proposals Map, are safeguarded for employment purposes for use classes E, B2 and B8 and other sui generis. Within these areas proposals for change of use to residential uses will be resisted. The extension or redevelopment of existing employment land and premises for employment uses within classes E, B2 and B8 will be supported where they:

We would still like to see a range of sizes of units as set out in EE 2.2 and that the impact on local housing are managed as per the policy – the tests in the policy should remain.

### **Policy EE3**

*Does the Town Council have any detailed comments on the District Council's updates on this issue as discussed at the recent Local Plan hearings?*

ELP Policy EMP3 appears confusing since in order to prove criteria i applicants will need to satisfy criteria ii, the introduction of 'or' between criteria i and ii does not add clarity. We feel that WNP policy EE3.1(b) is clearer and less ambiguous. Historically SODC has issued explanatory guidance to explain what evidence is needed and to help interpret the Local Plan 2011 and Core Strategy policies on this issue. WNP policy EE3.1 (b) encompasses this guidance and although slightly longer will be easier for applicants to interpret.

The introduction of clause iii to ELP EMP3 opens the door to significant loss of employment land contrary to the aims of the plan. In specific cases where living conditions of residents close to unneighbourly uses was an issue earlier local plans have allocated those unneighbourly sites for other uses. If this criterion is included, we would prefer it to be prefaced by 'In **exceptional circumstances where** a development would ...'

### ***Policy TC1***

*The policy is affected by the September 2020 changes to the Use Classes Order.*

*I am minded to recommend modifications to the policy to ensure it has regard to national policy.*

*Does the Town Council have any observations on this proposition? In particular does it have any comments on the way in which the new Order impacts on the purpose of the policy?*

We feel the new Order may well undermine the vitality of the town centre. However, as a Market Town, it is important to delineate the shopping area to help support the vibrancy of the economy. TC1.2 recognises that many changes are permitted development by indicating "where planning permission is required".

We suggest replacing "loss of **retail use**" on TC1.2 with "loss of **class E uses**" and in TC1.2(c) 'the **retail** unit.... for **retail** purposes' is replaced with 'the **employment** unit... for **employment** purposes'

### ***Policy TC5***

*Does the Town Council have any information on the occupancy rates of the existing off-street public car parks?*

We have no objective data – we recognise it is based on the steering groups own experiences and subjective opinion which was captured by consultations throughout the Plan process.

### ***Policy MC2***

*Does part 4 of the policy have regard to the Community Infrastructure Levy regulations?*

*In particular would there be any direct and functional relationship between new development and bus transport infrastructure in the town centre?*

*Should the policy take account of the scale and nature of the development proposed and its location?*

This is a locally based policy and aims to make public transport as effective and attractive as possible even for local journeys into the town center. Since it is hoped that existing and new residents will increasingly make use of public transport it is considered that the policy meets the tests in NPPF paragraph 56 and the CIL regulations as set out in the response to policy HA4. The town center is the bus hub so residents will either access public transport or will change between buses in the town center. There are no specific facilities for bus users in the market square. It is agreed that the policy should take account of the scale and nature of proposals, suggest MC 2.4 is altered to:

Proposals for major housing developments should contribute to ....

### **Policy CF3**

*Has any work been undertaken to assess the various proposed local green spaces (LGSs) against the contents of paragraphs 99 and 100 of the NPPF?*

*If not, please could this task be undertaken.*

*To what extent did the Town Council engage with landowners of the proposed LGSs as part of the Plan preparation process?*

This work was done – see proposed Appendix G.

### **Policy CF6**

*Does the first element of the policy have regard to the Community Infrastructure Levy regulations?*

*In particular would there be any direct and functional relationship between new housing development and the provision of health and social facilities in the town?*

We feel that this is compatible with the NPPF and CIL regulations as per our response to HA4 above.

The Oxfordshire Clinical Commissioning Group has objected to further major development in Wallingford due to lack of capacity (see representations made to P18/S2506/O) and the GP surgery has approached the Town Council for assistance in finding a new site. (Wallingford Town Council minutes of the meeting of Full Council of 29th June 2020).

This policy reflects one of the strongest concerns raised by the local community in our consultations. Whilst Wallingford is promoted as a sustainable place some services and facilities are now at or near capacity and major change is needed to increase capacity. Provision for healthcare in particular has not kept pace with the growth of Wallingford. Adequate funding has not been made available and agreement with the district council on how to extend the medical center has not been reached. There is only one medical practice in Wallingford and all residents should register there. It is likely that without resolution many new residents will be directed to medical facilities elsewhere.

### **Policy CF7**

*Does this policy add any distinctive value to the existing local arrangements (involving the District Council and the County Council) for securing developer contributions towards education provision?*

We accept this offers limited additional value to existing local arrangements, although as per comments for CF6 and HA4, we feel it is compatible with CIL regulations, and it captures significant local concern over education provision in Wallingford. In recent years Wallingford children have had to be educated outside of the town which is not sustainable. We note that Oxfordshire County Council, in their response to the Regulation 14 consultation stated; *“The county council appreciates this statement [CF7] and confirms that developer contributions will be sought towards the expansion of existing primary and secondary schools in Wallingford where required.”*

## Responses to SODC's representations

Policy or paragraph number and page number	SODC ref and Summary of comment	WNP Comment
General		The response does not indicate which comments are thought to reflect Basic Condition issues. It would be helpful to have SODC's views on this.
Page 10 –Paragraph 1.1.6	Update	Agree
Page 15–The Plan's Journey and Final Stages	Update	Agree
WS1 page 24, page 27	Remove the word policy	This is a local strategy for the WNP it is not in conflict with strategic policies of the LP 2035 or the core strategy. See response to Examiners clarifications.
Page 28 –Para 2.4.18		Agree
Page 28 –Para 2.4.19	Update footnote	Agree
Page 30 –Policy WS2: The Land Allocation for Housing in Wallingford		Shall is preferred
Page 31 –Footnote 10		Agree
Page 31 –Policy WS3: Housing Density		<p>Density is not a strategic matter as identified in NPPF paragraphs 20 and 21.</p> <p>The proposed density requirement in the Local Plan is very specific and does not leave flexibility for neighbourhood plans and local communities to determine what is appropriate in their local area. The Local Plan policy therefore continues to be in conflict with national policy.</p> <p>The policy does not add the flexibility that the Inspector has asked for as a minimum density is still set out in the policy.</p> <p>The strategic site policies in the Local Plan have significantly more flexible policies on density. These large strategic sites have a far greater capacity to accommodate higher densities and should have better public transport connections than small market towns with important historic centres and often limited public transport connections. It is not clear why potentially higher densities being required on smaller and non-strategic sites in market towns.</p>
Page 32 –Policy WS4: Development Within the Built-up Area		CF1 and 3 refer to policies in the WNP There is no reason to think that it would refer to policies in another document. The policy is clear. The policy aims to go further

		than the Local Plan 2011 which will be superseded.
Page 38 –Footnote 11		Footnote to be correct to “NPPF Section 12 and Planning Practice Guidance on design”
Page 41 –Policy HD4: Self Build		See our response to Site B comments by St Josephs.  The policy seeks to promote self-build and custom build housing to add choice and variety, the suggested change would not achieve this. SODC holds the register of interest for these types of housing. Add – unless it is demonstrated that there is already sufficient provision for self-build or custom build housing in the local area.
Page 41 –Policy HD5: Avoidance of Light Pollution		Must is preferred
Page 46 para 4.2.7	correct ‘Heritage England’ with ‘Historic England’	Agree
Page 57 –Policy HA1: This Historic Environment		The policy seeks to secure enhancement to the town’s historic environment as a whole, this does not mean that each element of the historic environment will need to be enhanced.
HA1.2(c)		Move to lower case text as a recommendation.
Page 59 –Policy: HA4: Enabling development supporting Heritage at Risk Page 59 –Paragraph 4.10.10		This policy conforms with NPPF policy 202. It is considered that all new residents are likely to use and enjoy the town’s historic assets and that increasing the town’s population above planned levels is likely to result in greater pressure on these assets which are on the At Risk register. The policy does not seek to impose restrictions on development required to meet Wallingford’s obligations in the Local Plan 2035, only to seek support for Heritage at Risk from development over and above identified local needs. The policy is in conformity with the NPPF and meets the relevant tests.
Page 65 map key not correct		Change North Wessex AONB to North Wessex Downs AONB
Page 68 –Policy EV1: New Green Spaces and Green Corridors Ev1.1(a3)		We would prefer that the net gain is provided locally within Wallingford to benefit the local community  Add ‘preferably within the development area, unless this is demonstrably not practical ...’



		Agree delete for Oxfordshire (e.g. Thames Valley Environment Record Centre)" Add:-ensuring new development provides a measurable net gain for biodiversity using the most up-to-date metric
5.4.2 Page 69	Change wording to read correctly	Agree this should read Within the context of the natural environment light pollution or excessive use of artificial light is inappropriate.
Page 77 –Policy EE2: Safeguarding Existing Local Employment Sites for Class B Use		The Local Plan 2035 modifications do not change the employment requirements for Wallingford. Agree that changes are required to reflect changes to the use classes order
Page 78 –Policy EE3: Resist Loss of Employment Space and Uses		The suggested wording does not encompass the same outcome as the proposed policy. However it could be reworded to be more concise.
Page 97 –Policy TC1: Primary Shopping Area		Agreed that this policy will need rewording to reflect changes in the use classes order. Agree change. Do not agree that suggested change to TC1.2(c) reflects aspirations set out in the WNP policy.
Page 97 –Policy TC2: New Uses for Buildings within the Primary Shopping Area		Area is correct – feel SODC map is out of date.
Page 97 –Footnote 37		Agree change
Page 98 –Policy TC3: Regal Site		This is a Town Council owned site and extensive work has been carried out to identify community wishes and practical possibilities. This is a clear aspiration for the community, the policy wording allows for flexibility if justified but also provides a strong indication about what the community wants for this site.
Page 98 –Policy TC4: Improve the Visitor Economy		Agree change The policy complements the Local Plan 2035 policy.
103 –Policy TC5: Public and Private Car Parks		Evidence is available from the local community and through our consultations that car parks in Wallingford are frequently at capacity. This is a locally based policy and should be retained.
Page 100 –Policy TC7: Preservation of Visitor Accommodation		The suggested change does not encompass the same criteria as the policy proposed.
Page 105 –Objective MC06		See WNP comments on OCC response and suggested amendment. This is a locally

		based policy, it is not in conflict with strategic policies. The county council standards are not part of the development plan and have not been through the same scrutiny as the WNP.
8.2.3 page 106	Our Air Quality Officer has suggested that the Plan could make reference to the South Oxfordshire Air Quality Developers Guidance	8.2.3 could include the following text.  The South Oxfordshire Air Quality Developers Guidance recommends that developers carry out Air Quality Assessment of their proposed development.
Page 108 –Policy MC2: Access to Public Transport	Overly-restrictive, not in line with para 56 of NPPF.	If proposals do not provide access to public transport within this distance they are normally refused. This policy is phrased in a positive way to achieve the same end. This is a locally based policy and aims to make public transport as effective and attractive as possible even for local journeys into the town centre. Since it is hoped that existing and new residents will increasingly make use of public transport it is considered that the policy meets the tests in NPPF paragraph 56.
Page 111 –Policy MC7: Provision of Electric Vehicle Charging Points		Agree that some rewording is appropriate
Page 128 –Paragraph 9.3.5		This is supporting text and adds specific local information to the plan. The policy was worded to reflect wording in the emerging Local Plan.
CF3 page 126	Where’s the evidence for Local Green Spaces?	To be supplied as proposed new Appendix G.
CF4.4 page 126	suggest new wording to avoid the ‘local v non-local’ and focus on land use not river use	The policy relates to the land based facilities for water sports. River based sport is important for the local community. However the scale of use by Oxford based clubs which do not allow local membership could inhibit local people from enjoying river based sports. A balance needs to be established to enable both to co-exist without damaging the river banks. The suggested change does not take account of local concerns.  We Suggest new text for 4.4 as  Where facilities for river-based sports and recreation are proposed, consideration should be given to the appropriate nature of the use of riparian land (i.e. land adjoining the river) which may have constraints on

		how it is used. All proposals for new and enhanced facilities for organisations to use the river will be supported in line with other policies in the Neighbourhood Plan.
Page 128 – 9.3.20 And CF7	Concern about the validity of infrastructure policies.	<p>These policies reflect the strongest concerns raised by the local community in our consultations. In formulating the overall development strategy for the district it is assumed that towns are sustainable places to expand without reference to the remaining capacity in essential services. Provision for healthcare in particular has been ignored by the district council in promoting the growth of Wallingford. Adequate funding has not been made available and agreement on how to extend the medical centre has not been reached. The consequence is that the CCG and medical practice have raised strong objections to further housing growth in the area and once existing commitments are built it is likely that some new residents will be directed to medical facilities elsewhere. Residents are already required to travel to other towns for medical services such as physiotherapy, audiology etc. This situation is now critical.</p> <p>OCC has a more proactive approach to securing contributions for education, it is nevertheless reasonable, in the absence of other funding arrangements, to require that needs generated by a development are met so that residents have the choice of receiving a local education.</p> <p>See also responses to Examiners questions on this issue, and proposed Appendix H.</p>
C1/C2/C3/C5	Tables duplicated	Agree remove duplicates
Page 156	Pictures swapped	Agree include text next to correct picture
MC7 page 111	7.1 replace 'will' with 'should'	<p>We prefer 'will'. The Guidance referred to above includes this statement: Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made. For every 10 residential homes built and 1000m2 of non-residential development there should be at least 1 'rapid charge' EV charging point installed.</p>
MC7.2	Replace 'will' with 'should' (it's currently	We'd like to keep 'will' and delete 'should'. Suggest new text for 8.3.20 as

	wrong) and add flexible wording	The deliverability of this policy is subject to technical feasibility and the use of the most appropriate technology to reduce carbon emissions, as recommended in the South Oxfordshire Air Quality Developers Guidance.
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<p>Para 2.3</p>	<p>This is due to:</p> <ul style="list-style-type: none"> <li>• Harm to adjacent North Wessex Downs AONB and its setting</li> <li>• mineral safeguarding from OCC</li> <li>• likely increase in traffic through AQMA</li> <li>• access from Wantage Road intrusive in landscape and no capacity</li> <li>• proposed access onto Shillingford Road involves unacceptable increase in road capacity, road bridge with one way traffic lights</li> </ul> <p>Both developers are promoting their own sites and challenging the housing figures in the WNP.</p> <p>While these comments are noted, the WNP housing allocation is consistent with the SOLP 2035 currently being considered by the Inspector which has considerable weight at this stage. WTC do not agree with the developer's comments made on housing policies in the WNP.</p> <p>WTC do not consider it necessary to define the built-up area of the town, the planning test criteria at WNP Policy WS4 are clear.</p> <p><b>Optimis Consulting for Croudace Homes comments</b>  suggest the Neighbourhood Plan period is extended to 2035 to maintain conformity with the South Oxfordshire Local Plan.  As plans need to be reviewed every five years it is not agreed that the end dates of the plans need to be identical. The evidence for the local plan, and therefore much of the evidence base for the WNP does not extend to 2035.</p>
<p>Para 2.4</p>	<p>We would not advocate the Neighbourhood Plan advancing prior to the adoption of the Local Plan, as draft policies within the Local Plan are subject to change throughout the examination process and the Neighbourhood Plan will need to be amended to reflect this.</p> <p>The WNP has been written to be in general conformity with the emerging Local Plan (ELP), and adjustments have been suggested to accommodate modifications proposed to the ELP. We believe the plans can be considered concurrently, although we have agreed that the final decision on the WNP should post date that on the ELP.</p>
<p>Para 2.6</p>	<p>It is not considered the current draft Neighbourhood Plan fully recognises the role Wallingford plays as key service centre within the district.</p> <p>The WNP fully recognises the town's role as a local service centre at para 2.4.7 and sets out to ensure that the needs of its dependent communities are properly considered.</p>
<p>Para 2.9</p>	<p>In the light of the Local Plan Inspector's comments it is appropriate to investigate Wallingford's ability to accommodate further growth over and above this 1070 figure.</p> <p>An assessment of accommodating further growth above the figure given in the ELP and the existing commitments was undertaken as part of the plan preparation process in the Site Assessment paper, the Strategic Environmental Assessment (SEA) also considered this option. A Housing Needs Assessment was also undertaken to assess whether a higher housing figure was needed. The HNA concluded that additional housing was not</p>

<p>Para 2.10</p>	<p>required to meet local needs, while the SEA indicated that a higher growth option would be less sustainable than the plan proposal and that sites A1 and A2 were not a reasonable option due to the significant objections raised by OCC. The steering group concluded that on the basis of the evidence that a higher housing allocation would not command the local community's support.</p> <p>The Neighbourhood Plan removes the ability for residential growth during the latter part of the plan period and therefore fails to deliver sustainable development throughout the entire duration of the Plan.</p> <p>SODC has set out a strategy for growth throughout the district with appropriate commitments for infrastructure (including government funding where necessary) to support this growth. Making significant and strategic allocations for growth in different areas is likely to mean that the overall SODC strategy may not be achieved and/or that adequate infrastructure will not be provided in the right places, a point emphasized in the Thames Water response. There is no requirement that every settlement in the district must have its own individual 15-year supply. SODC's housing trajectory demonstrates that there is sufficient provision for housing in the district to deliver homes well beyond the plan period and that there will be at least a ten-year supply of housing within Wallingford without any windfall development. Any review of the WNP can identify further allocations if this is shown to be necessary.</p>
<p>Para 3.8</p>	<p>Para 2.3.7 should be reworded as follows: The WNP sets out a positive vision for the future of Wallingford within the context of its historical character and constraints. It seeks to balance the economic, social, and environmental objectives of planning whilst recognising the aspirations of the local community.</p> <p>Disagree – the current wording reflects our view.</p>
<p>Para 3.9</p>	<p>Paragraph 2.3.8 should be reworded: Inappropriate development, which is not consistent with these policies, or which lies outside of these defined areas, will not be supported, unless it can be demonstrated that there is a local need or local support from existing residents.</p> <p>Policies are TC3, EE1, EE2, MC6 and WS2 as defined in the proposals map below. On this basis, no development outside of the policy areas will be supported by the Neighbourhood Plan. This approach is at odds with the thrust of the whole Neighbourhood Plan and in particular Policy WS1 which encourages focus development within the built-up area of Wallingford. Additional areas must be incorporated into the Proposals Map, including a clearly defined area to represent the built-up area of the town.</p> <p>Recommend land to the north of Wallingford is identified as a potential area for development.</p> <p>The ELP sets out the strategy for the whole district, the identification of the land north of Wallingford as a potential development area would be a strategic allocation and it is not appropriate for a neighbourhood plan to make such an allocation. The WNP provides a clear and unambiguous approach for the growth of the town as required by the NPPF, significant work and evidence has been prepared to support the plan's policies.</p>
<p>Para 3.30</p>	<p>Paragraph 9.2.29 confirms that Wallingford School is already operating at capacity and has a significant waiting list. This is particularly relevant in</p>

	<p>respect of the existing commitments, given none are providing secondary education facilities as part of the development.</p> <p>Proposals are in place for the expansion of Wallingford School to meet the planned housing growth within its catchment area. We understand that this expansion does not cater for a higher level of growth within the catchment area. We are not aware of any proposal for major local development which includes additional secondary school provision.</p> <p><b>Baton Wilmore for L and Q Estates</b></p> <p>Chapter 1 – refer to Oxfordshire Housing and Growth Deal This is a strategic matter and not appropriate for a neighbourhood plan.</p> <p>Chapter 2 Various amendments to the Vision suggested There have been considerable opportunities for input to the Plan’s Vision and it has been developed over multiple exercises with the local community, having regard to the Basic Conditions and ELP. It would be inappropriate to change the vision as suggested now.</p> <p>Policy WS1 – The Strategy for Wallingford The strategy is generally consistent with the strategic policies of the ELP. The ELP sets out the overall district strategy, it is not appropriate for a neighbourhood plan to alter this as is being suggested. NPPF paragraphs 28 to 30 provide specific policies for neighbourhood plans, the WNP is in conformity with these.</p> <p>Policy WS2 Additional allocation on Site A proposed See comments above in relation to Croudace comments.</p> <p>Policy WS3 seeks a density range of 30 – 50 homes/ha Support for a more flexible approach on density is appreciated.</p> <p>Chapter 3 HNA methodology The methodology for HNAs set out in national guidance is designed to be carried out across a housing market area not at individual settlement level. The HNA carried out provides a good assessment of local needs in Wallingford.</p> <p>Minerals Safeguarding Area OCC is the Minerals and Waste authority and the WNP respects their advice. It is not appropriate for the WNP to formulate its own approach on this strategic matter. Development on L and Q land would be likely to sterilise deposits on the adjoining land which has not been assessed.</p> <p>AQMA An AQMA is a district council matter, it is not appropriate for the WNP to take a different view. The L and Q Air Quality Assessment does not appear to have taken account of traffic from this site and existing commitments around the town.</p> <p>CF5 change convenience shops and pubs to community facilities</p>
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	<p>This policy was specifically designed to encourage the provision of local business premises.</p> <p>Site Assessment comments see comments on Croudace Homes section above</p> <p>Background information – affordable housing requirements Policy HD3 is clear that affordable housing should be provided as detailed in the South Oxfordshire development plan – this ensures reference is made to the most up to date plan.</p>
<b>Respondent 10 – Chilterns Conservation Board</b>	
Vision and objectives	<p>Add :The ‘attractive landscape setting’ could justifiably be raised to ‘attractive <b>highly valued</b> landscape setting’.</p> <p>We support this addition</p>
<b>Respondent 11 – Oxfordshire County Council</b>	
re policy MC5.1 page110	<p>‘Development proposals should meet Oxfordshire County Council’s minimum parking standards. Where feasible and appropriate, they should also meet the following standards.’</p> <p>Wallingford is a rural market town where car ownership levels are higher than average. Residents have expressed strong concern about lack of parking and consequent on-street parking and safety issues in new housing areas. The policy could be reworded to:</p> <p>On all new developments including extensions to existing homes parking must be provided in accordance with the following minimum standards. The Design Considerations in the OCC parking standards for new residential developments should be followed.</p>
re policy 2.4 p108	<p>Agree change: ‘Development proposals should contribute to the provision and improvement of bus transport infrastructure related to the site and services connecting Wallingford with other locations within the town centre.’</p>
para 2.3.5 p22	<p>Paragraph 2.3.5: This paragraph should be specific on walking infrastructure. This should include comfortable footways, safe crossing points where needed, regular maintenance of footways and signage to shops and public transport. This is an overall vision encompassing all forms of movement. The Movement and Connectivity vision in Chapter 8 provides more focus on pedestrians and walking.</p>
7.7.4 p96	<p>7.7.4 from the previous draft. The amendment states: “Land at St Georges Road which has been used until recently as playing fields is being considered for car parking use in order to enable the school to expand on its current site”. This amendment was made after the application had been referred to the Secretary of State, however in a letter dated 25 February 2020, the Secretary of State communicated that they had decided not to call in this application and was content that it should be determined by the LPA. The application was subsequently approved on March 04th 2020, and the wording of 7.7.4 should be amended as such. Since the previous consultation there has also been an approval for a linked application for the extension of Wallingford School (P19/S0191/FUL), once more this should inform an amendment to paragraph 7.7.4.</p> <p>Agree these suggested updates</p>
<b>Respondent 12 – Turley for David Wilson Homes</b>	
WS1	WS1 Not positively prepared.

<p>HD1.3</p> <p>HA3</p> <p>EE1</p> <p>Other</p>	<p>Policy WS1 supports housing growth within the town and includes substantial undeveloped areas committed for new housing. It is a positive policy which encourages growth within an attractive rural setting.</p> <p>ELP The main modifications to the ELP are published and adjustments to the WNP have been suggested to ensure the WNP is in general conformity with the ELP.</p> <p>Site E allocation The allocation of this site is appropriate for a neighbourhood plan, particularly as the permission has a short life and may lapse.</p> <p>HD1.3 Design The South Oxfordshire Design Guide is an adopted SPD. The Conservation Area Appraisal and Character Assessments provide useful information on the existing character areas in the town which help provide local context for new developments and design and access statements. The documents allow considerable flexibility for the design of new developments.</p> <p>HA3 Views and Vistas Agreed it is proposed to include this map.</p> <p>Policy EE1 – Multiple employment units are proposed at site C and meet the need for land during the plan period identified in the South Oxfordshire Employment Land Review. Land is also available in Crowmarsh to the east of the river.</p> <p>Our comments on the assessment of growth options are included in the section above on Croudace and Land Q.</p> <p>We note that since making this submission David Wilson Homes failed to get planning permission for developing Site D, and has withdrawn their appeal against this decision.</p>
<p><b>Respondent 13 – Historic England</b></p>	
<p>WNP Page 199 re WS2.2(h) 2.4.23</p>	<p>The explanation and understanding of the very important and unique heritage at Wallingford is appreciated. This heritage is often overlooked in decisions about the growth of the town.</p> <p>HA4 Agree that the At Risk heritage need a particular focus, but concern about whether HA4 is capable of implementation and whether it will result in pressure on other assets due to overdevelopment.</p> <p>As these open spaces are well protected from new development there are few opportunities to secure improvements through on site developments. However, as the sites are well used by almost all residents the steering group feels there is a strong link to development sites around the town to justify securing improvements through policy HA4. Much of the damage to the earthworks results from the extensive public access.</p>

	<p>We would encourage the examiner to consider whether the requirement to protect the areas of archaeological interest during the construction phase set out at 2.4.23 should also be included in the policy, given the potential impact of site stripping, creation of plant transit and storage areas or development of scrub during an extended period of development.</p> <p><a href="#">Agree this suggested change</a></p>
<b>Respondent 14 – AVISON Young for National Grid</b>	<i>no comment needed</i>
<b>Respondent 15 – Natural England</b>	<i>no comment needed</i>
<b>Respondent 16 – Network Rail</b>	<i>no comment needed</i>
<b>Respondents 17 &amp; 18 – St Edwards Homes Ltd and Carter Jonas (Site B, Highcroft)</b>	
WS1	<p>Various comments</p> <p><a href="#">Policy WS1 encourages amongst other things the efficient use of land, there are however many valuable land uses to be balanced. ‘Optimising capacity’ infers a greater emphasis on housing than other uses. Recent evidence from Bluesky International for example indicates that in many areas gardens have more tree cover than open countryside and slightly lower densities may therefore be more valuable for biodiversity and climate change. We believe that decision makers should be able to make a choice about appropriate densities having regard to local circumstances and needs.</a></p> <p><a href="#">We are happy that the existing wording of policies WS3, HD3.1, 3.2d, 3.2e reflects our view about how development should take place.</a></p>
HD4	<p><a href="#">Whilst evidence of need for custom build and self-build homes is limited, this may be because plots have not historically been made available. A change in approach may help encourage take up.</a></p>
MC5	<p><a href="#">Comments on Policy MC5 are set out in the response to OCC comments.</a></p>
MC 7.3	<p><a href="#">The intent of this is not to require charging points at bus stops and the like, but relates to provision at residential units. We propose re-wording to; ‘All new communal blocks within residential developments with bicycle storage will provide one EV charge point for every five bicycle spaces.’</a></p>
para 2.4.27	<p>Paragraph 2.4.27: The WNP states that the higher level of development is inappropriate for Wallingford. This statement is not compliant with the ELP, therefore, in line with the above, St Edward suggests for consistency to remove the statement. “We note that SODC in the ELP are looking to achieve minimum densities of 50 units/ha and at Policy DES 8 are looking to achieve a minimum density of between 30 and 50 dwellings per hectare. <del>This is inappropriate for Wallingford.</del></p> <p><a href="#">We agree that higher density may be appropriate in more urban areas, but our view is that Wallingford’s rural character, important heritage and proximity to sensitive AONB landscapes needs more flexibility on housing densities. In streets close to submitted housing sites we have found densities to be between 14 and 33 dph. We believe that 10 dwelling units is the minimum number below which density ceases to be meaningful statistical measure.</a></p>
HD3.1 WNP p40	<p><del>“HD3.1: A mix of housing types and sizes to meet the needs of current and future households will be provided-supported within new developments as detailed in South Oxfordshire development plan. HD3.2(d): integrate affordable housing such that it is inclusive and non-discriminatory in terms of appearance and accessibility with indistinguishable in appearance from the</del></p>

	<p>market housing on that site. HD3.2(e): does not isolate affordable housing, nor concentrate it in clusters of more than 15 dwellings or 10% of the development total whichever is smaller, unless it is necessary for management purposes or to address local authority/registered provider requirements.”</p> <p><a href="#">We reject the suggested changes. Current policy supports healthy and diverse communities, and inclusivity.</a></p>
3.5.7 on p41	<p>“A wide mix of housing types is needed in order to meet the requirements and aspirations of the community by increasing the option for housing mobility within the town. <u>The housing mix in development shall have regard to South Oxfordshire District Council’s latest evidence of need.</u>”</p> <p><a href="#">Accept insertion</a></p>
WNP p 110 MC5.1 & MC5.2	<p>MC5.1 &amp; MC5.2</p> <p><a href="#">see earlier suggested amendment from OCC</a></p>
MC7.3 on p 111	<p>“MC7.3: Provision of EV charging points for public bicycle parking in new residential developments will be supported All new residential developments with public bicycle storage will provide at least one EV charge point for every five bicycle spaces.”</p> <p><a href="#">As in response to St Edwards.</a></p>
<b>Respondents 20 – Thames Water</b>	
	<p>Add;</p> <p>Flood Risk and SuDS</p> <p>“Surface water drainage -it is the responsibility of a developer to follow the sequential approach to the disposal of surface waters with proper provision for surface water draining to ground, water course or surface water sewers being given. The discharging of surface waters to the foul sewer can be a major contributor to sewer flooding and should therefore be avoided”.</p> <p>Water and Wastewater infrastructure</p> <p>“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p> <p>Thames Water encourages developers to use their free pre-planning service (<a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a>). This service can tell developers at an early stage if there will be capacity in Thames water and/or wastewater networks to serve their development, or what they will do if there is not. The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.”</p> <p><a href="#">We are happy to include this suggested text in a separate section in Chapter 9</a></p>

## APPENDIX G – EVIDENCE FOR LOCAL GREEN SPACES

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- G.1 The information below supports policy CF3.
- G.2 The Wallingford Neighbourhood Plan proposes the allocation of three Local Green Spaces, referred to in the WNP as: Wilding Road, Radnor Road and The Paddocks.
- G.3 In summer 2018 the WNP Steering Group made a public appeal for comments from residents giving evidence of their use of these three spaces for recreation<sup>1</sup>.
- G.4 The information gathered then and subsequently has been used to complete the templates required to show how the proposals meet criteria for Local Green Spaces as set out in NPPF paragraph 100.
- G.5 SODC has responded to Wallingford Town Council regarding the two sites that it owns: Radnor Road and Wilding Road, and has no objections to these sites being designated as Local Green Spaces.
- G.6 In January 2019 Wallingford Town Council wrote to the Estates Director at Oxford Health NHS Foundation Trust in relation to the land it owns at The Paddocks, but did not receive a response. The Trust was also invited to comment at Regulation 14 consultation stage, but no response was received.

### G.1 Wilding Road

- G.7 The proposed Local Green Space (LGS) is a small rectangle of open space of approx. 0.28 ha between numbers 15 and 17 Wilding Road. It is owned by South Oxfordshire District Council. Policy CF4 in the Emerging Local Plan covers the retention of existing recreation areas such as Wilding Road.
- G.8 At the same time as the Neighbourhood Plan was identifying it as a proposed LGS a local resident, Anthony Hurford sought to have it registered as a Town Green. He submitted his application to Oxfordshire County Council in February 2018.
- G.9 This process failed because the landowner (SODC) continues to maintain it as a ‘children’s playground’ or ‘children’s play area’. Local people can use the space by right, with the permission of SODC the landowner.
- G.10 The Oxfordshire County Council’s Town Green Registration annexes<sup>2</sup> refer to the evidence obtained by Mr Hurford from local people who had long memories of the space being used for at least 20 years by local people for children to play on, and community events such as street parties to be held.
- G.11 The level of interest shown by Mr Hurford who gained publicity for his campaign through social media and the local press, and was supported by local families, demonstrates there is continued interest in protecting the Wilding Road green space for people to continue to use as permitted by the landowner, and would be suitable as a designated Local Green Space in the Wallingford Neighbourhood Development Plan.
- G.12 It is clear from the Counsel’s Opinion (para 38 of Annex 3<sup>2</sup>) that the land at Wilding Road has been allocated for ‘children’s playing field’ or ‘children’s playground’ for the last 68 years, since the 1952 planning applications to present day.

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<sup>1</sup> A flyer was distributed across town and the call advertised on local Facebook groups – [see image](#).

<sup>2</sup> [Town Green Registration documents](#) – ref NLREG42

G.13 It was bought by Wallingford Borough Council in 1945, and identified as ‘children’s playing field’ in planning applications for housing in 1952. On local government reorganisation in 1974 the land was transferred to SODC, and in 1997 retained by SODC when houses on Wilding Road were transferred to South Oxfordshire Housing Association (SOHA). Throughout this time the land retained its identification as ‘playground’ and SODC continues to maintain it as such.

<b>Site Details</b>		
Land at Wilding Road, opposite the junction with Andrew Road.	SU599902	0.28ha of grassed open space. Owned by South Oxfordshire District Council, and identified as HELAA 424.
<b>Checklist</b>		
<b>Statutory Designations</b>	<b>Site Allocations</b>	<b>Planning Permissions</b>
None	Wallingford Neighbourhood Plan recommends allocation as Local Green Space, Policy CF3 so that it can be part of the Wallingford Green Network Policies EV1 and EV2	None
<b>NPPF Criteria para 100</b>		
<b>Close proximity to the local community</b>	<b>Demonstrably special and of significance to the local community</b>	<b>Local in character and not extensive</b>
<p>It was designated as ‘children’s playground’ in 1952 housing applications by Wallingford Borough Council prior to building the houses in this area.</p> <p>Extensive housing association-owned and privately-owned housing immediately to the west, east and south of this space.</p> <p>Children’s play equipment was located on this space in the 1980s, and since removed.</p> <p>In response to WNP request for information, one resident described ‘running around and playing’ on the land at Wilding Road in the 1980s.</p>	<p>Mr Anthony Hurford of 1 Sinodun Road, Wallingford has applied to Oxfordshire County Council for this site to be registered as a Town or Village Green<sup>2</sup>.</p> <p>Although Mr Hurford’s application failed he had obtained several accounts from local residents who remembered playing on the land from the 1960s, and it was used for street parties to celebrate national events.</p> <p>The newly-created community group, Friends of Wallingford and Cholsey Green Spaces, is seeking to work with SODC to improve the amenity space, informed by two surveys of local residents, taken before and after the decision on the Town Green application.</p>	<p>The open space at Wilding Road is only 0.28ha in size. It is bounded to the north by open fields used for agriculture.</p> <p>It has been in use as a public recreation area since the adjacent houses were built in the 1950s.</p> <p>The landowner, SODC, continues to maintain it by cutting the grass, pruning the trees and emptying the litter and dog-poo bins located on the space.</p>

## G.2 Radnor Road

- G.14 The proposed Local Green Space (LGS) is an oblong area of open grass of approx. 0.8 ha between Public Footpath No 11 and Radnor Road. It is owned by South Oxfordshire District Council. Policy CF4 in the Emerging Local Plan covers the retention of existing recreation areas such as Radnor Road.
- G.15 During the consultation processes for the Neighbourhood Plan local residents used Facebook and informal networks to express interest in managing the open space, known locally as Radnor Park and Radnor Green, for biodiversity as well as more people to enjoy using it.
- G.16 A residents' association, Radnor Road Park and Field Association, is now working with the landowner, SODC, to spend S106 funds which were allocated for this space in 2014. In October 2020 paths will be laid, and the residents' association will be involved in improvements made to wildlife habitats to enhance biodiversity, and also children's recreation.

Site Details		
Land at Radnor Road	SU599895	0.81ha of grassed open space crossed by network of informal footpaths between Public Footpath No 11 and Radnor Road. Owned by South Oxfordshire District Council, identified as HELAA 433.
Checklist		
Statutory Designations	Site Allocations	Planning Permissions
None	Wallingford Neighbourhood Plan recommends allocation as Local Green Space, Policy CF3 so that it can be part of the Wallingford Green Network Policies EV1 and EV2	Site was designated open space in June 1964 when planning permission was given by Berkshire County Council to build the nearby housing estate and create the open space on what was then known as Station Field Allotments.
NPPF Criteria para 100		
Close proximity to the local community	Demonstrably special and of significance to the local community	Local in character and not extensive
Housing development immediately to the north of the open space with pedestrian access to Radnor Road and Allnatt Avenue.	People living in the mid-1960s development of houses on Radnor Road and Allnatt Avenue walk across the open space to Footpath 11 which goes into the town centre.	The open space at Radnor Road is owned by South Oxfordshire District Council.
Fir Tree Junior School to the west of the open space.	People walk/cycle across this green space to and from the town centre, and the business and retail units on Hithercroft, for work, shopping, school and visiting friends.	It is 0.81ha in size and has been in use as a public recreation area since the 1960s when the housing development was built at Radnor Road and Allnatt Avenue.
Southern boundary is Public Footpath No 11 between the Allotments and the town centre.	Radnor Road Park and Field Association and the Friends of	The boundaries are clearly visible when using this green space.

<p>South of the footpath is a new housing development on Habitat Way and Imray Place where several houses look into the open space.</p> <p>Tumim Court, a development of privately-owned flats for older people, overlooks the open space.</p>	<p>Wallingford and Cholsey Green Spaces group are working with SODC to implement improvements to the site.</p> <p>Local teenagers meet up in the open space for after-school socialising.</p> <p>Children’s play equipment installed in the 1960s was popular until it deteriorated and was removed in 1980s.</p> <p>The open space has been used by local Scouts and Cubs for several decades, at least from the 1970s, for activities in the summer.</p> <p>Children from Fir Tree Junior School, adjacent to the open space, use it daily to get to school. Seen from 1970s to present-day.</p> <p>Families use the space for cricket, football and picnics. This was seen by local residents from 1970s to present-day.</p>	
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### G.3 The Paddocks

- G.17 This rectangular site of approximately 1.43 ha is off Paddock Road, a residential road, and bordered by Squires Walk, a residential road in the Winterbrook Conservation Area, and land at the Wallingford Medical Practice, Reading Road, Wallingford OX10 9DU
- G.18 The site is owned by Oxford Health NHS Foundation Trust. Part of it is leased to Crowmarsh Youth Football Club.
- G.19 In January 2019 Wallingford Town Council sent an email to the Estates Director at Oxford Health NHS Foundation Trust regarding the proposed designation, but no response received. In August 2019 the Trust was invited to comment at the Regulation 14 consultation stage of the Neighbourhood Plan. No response received by the Town Council.



<b>Site Details</b>		
Land at The Paddocks, off Reading Road, Wallingford	SU605889	1.43 ha of grassed sports ground, owned by Oxford Health NHS Foundation Trust
<b>Checklist</b>		
<b>Statutory Designations</b>	<b>Site Allocations</b>	<b>Planning Permissions</b>
None	Wallingford Neighbourhood Plan recommends allocation as Local Green Space, Policy CF3 so that it can be part of the Wallingford Green Network Policies EV1 and EV2	Planning permissions for this site relate to the sports pavilion for the football club and metal railings fence around the site.
<b>NPPF Criteria para 100</b>		
<b>Close proximity to the local community</b>	<b>Demonstrably special and of significance to the local community</b>	<b>Local in character and not extensive</b>
<p>The Paddocks is immediately adjacent to Wallingford Community Hospital and Wallingford Medical Practice.</p> <p>It is bounded on the eastern side by Squires Walk, part of the Winterbrook Conservation Area.</p> <p>To the north and west are housing in Paddock Road and Wormald Road. South of the Medical Practice is a new residential development.</p>	<p>The Paddocks have been in regular use by Crowmarsh YFC since the mid-1980s; there are four youth sports pitches. Ron Harink from the Club writes:</p> <p>‘On behalf of Crowmarsh Youth Football Club I’d like to take this opportunity to share how we use the green spaces in Wallingford, and specifically The Paddocks playing fields.</p> <p>We are an entirely volunteer led youth football club with 24 youth teams in age groups between 6 and 16, including 5 girls teams. We offer the opportunity to train and play football matches to approximately 300 youngsters.</p> <p>The younger age groups (6-10) use The Paddocks as their base. We have currently 10 teams who train and play their matches there and on the adjoining St John’s school field. On a Saturday morning we regularly have between 6 and 8 matches scheduled which involves well over a hundred youngsters and a similar numbers of parents, coaches, officials and others.</p>	<p>The open space at The Paddocks has been in use as a public recreation area for several decades.</p> <p>Although larger than the other two proposed LGS sites, the boundaries are clearly visible from all parts.</p> <p>Large trees are on the boundary with Squires Walk making a tranquil natural barrier between the sports pitch and contributing to the setting of the conservation area.</p>

	<p>The Paddocks has been the home of the younger age groups for many years now (since mid 1980s). In fact, the facility is so important to us that, without it, we couldn't offer regular football to as many children as we do currently. The club recognises this and has recently invested in the refurbishment of the pavilion, with new outside cladding and an internal repaint. Other facilities we use (the Bullcroft park and Crowmarsh Recreation ground) also operate at full capacity.</p> <p>We are very keen to work with the town council to safeguard and develop these facilities for the future and continue to offer youth football for the younger generation in Wallingford and surroundings for many years to come.'</p> <p>SODC leisure study identifies a particular need for junior football pitches.</p> <p>Local resident describes walking their children to school across The Paddocks in the 1970s.</p> <p>Local resident describes their children playing on The Paddocks since 2000.</p> <p>The Paddocks is used by dog walkers because there is fencing on all the boundaries.</p>	
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## APPENDIX H – MAJOR INFRASTRUCTURE REQUIREMENTS

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- H.1 At the Examination of the ELP held in July & August 2020, the Inspector commented that he will expect that NDPs should define the infrastructure requirements in their areas and that wording will be added to this effect. The Wallingford Neighbourhood Plan discusses a number of infrastructure constraints throughout the main text, but with the main aim being a focus on land-use policies relating to housing, employment and transport, the Steering Group has prepared the Plan on the assumption that major infrastructure is outside the context of the Plan.
- H.2 The Steering Group welcomes the opportunity provided by the ELP Examination to list here the major infrastructure required which we believe will improve the sustainability of Wallingford and ensure that it continues to play a key role as a thriving market town within South Oxfordshire.
- H.3 The items listed here are to be taken as informative – we recognise that a NDP on its own cannot be used to constrain development through a lack of infrastructure. Our aim in listing items here is to present, in a concise and coherent form, those items which if addressed via other means, can only improve the sustainability of Wallingford to ongoing and future development.
- H.4 Wallingford is a hub for service provision to the surrounding villages and infrastructure provision needs to meet the cumulative needs of all these settlements.
- H.5 As services and facilities change according to the provider’s resources an infrastructure list must inevitably be a live document. Given the very limited time available to prepare this appendix, the commentary in this appendix is necessarily brief and the justification limited. The list will be regularly updated through the life of the plan and further details added.
- H.6 We recognise that some of these requirements will be difficult to resolve. Constraints may make providing some of these expensive and/or environmentally challenging. There are also physical constraints due to the town’s heritage. Nevertheless, the following major infrastructure issues must be addressed if Wallingford is to continue to be an attractive, safe and healthy town with a sustainable economy. Provision is seldom impossible and we welcome suggestions as to how the following might be addressed.
- H.7 **Improved primary health care provision.** The current GP surgery is at capacity and cannot significantly expand on the current site. Small adjustments to the current building are planned but it is imperative that a new site is found to allow service expansion<sup>3</sup>. The problem is likely to be exacerbated by NHS England’s increasing focus on a smaller number of larger “hub” centres for primary health care – thus Wallingford is expected to continue serving the local villages.
- H.8 **Secondary school provision.** Wallingford secondary school is at capacity. Planned expansion (currently under construction) will allow a further 2 classes of entry per year for a total capacity of 1,500 pupils but this does not take account of many large-scale developments recently given planning permission in the area<sup>4</sup>.

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<sup>3</sup> The Oxfordshire Clinical Commissioning Group has objected to further major development in Wallingford on these grounds (see representations made to P18/S2506/O) and the GP surgery has approached the Town Council for assistance in finding a new site. (Wallingford Town Council minutes of the meeting of Full Council of 29<sup>th</sup> June 2020).

<sup>4</sup> P19/S4477/FUL, P20/S0718/HH, P20/S0304/FUL, P19/S0433/FUL, P17/S3499/FUL, P18/S1010/FUL, P16/S3608/O

- H.9 **Improved roads.** There are 5 routes in to Wallingford – two involve single carriage-way bridge crossings across the Thames (one of which is a scheduled monument). The third, through Winterbrook to the south, is to all practicable purposes, also single carriage-way. These three are all routinely congested, and even minor disruption to the surrounding road network leads to gridlock. Residential roads are regularly used as “rat-runs”. Congestion and accessibility are major restrictions on the viability of bus services. Four of the five routes converge directly on the cross-roads in the town centre which is the focal point of the AQMA. An integrated, large scale strategic view, of road improvements is needed with the aim of reducing the volume of through traffic and its speed.
- H.10 **Improved walking and cycling facilities**
- a. Pavements and road crossing facilities where pavements alternate sides of the road in many areas of the town are inadequate, narrow and poor quality, this is particularly the case along Reading Road and in the town centre. There are inadequate crossing facilities and off-road routes. Walking facilities for the disabled whether in wheelchairs or mobility vehicles are urgently needed.
  - b. Facilities for crossing major routes e.g. the bypass are particularly poor and dangerous and are likely to deter walkers and cyclists from accessing train services at Cholsey and using public footpath routes in rural areas around the town.
  - c. Cycling facilities are very limited, safe routes need to be established and signed and adequate cycle parking facilities provided.
- H.11 **Improved public car parking.** There is a shortage of public car parking places which limits the attractiveness of the town’s retail and tourism offering. Poor on street parking is a major cause of concern for residents in some parts of the town. In 2017 SODC proposed to allow mixed public and private use of the new car-park to serve the Wallingford school expansion but these plans were ultimately not delivered. Whilst we recognise this issue needs to be carefully considered such that increased parking does not lead to conflict with the need to encourage alternative sustainable modes of transport, this remains a high priority for many residents.
- H.12 **Commuter train service.** The Cholsey to Wallingford railway line, a heritage route currently used for occasional steam and diesel-hauled services, has the potential to offer sustainable transport connections to Didcot, Oxford and Reading via the mainline railway station at Cholsey. Wallingford station at Hithercroft, is within a 20-minute walk of several residential areas and a 15-minute walk of the town centre. Cholsey parish council have expressed concerns that growth in Wallingford will inevitably lead to increased on street commuter car parking in the village of Cholsey. A commuter service between Wallingford and Cholsey to access mainline services from Cholsey would greatly alleviate this.
- H.13 **Increased potable and waste water services.** The 2016 Water Cycle Study<sup>5</sup> stated that “the level of development [in Wallingford] is likely to exceed current capability of [potable] mains within this area”, and furthermore that “the wastewater network capacity in this area is unlikely to be able to support the demand anticipated.” This study predated a large number of speculative housing site applications which have since been given permission. Future demand is now higher than predicted in 2016 and the shortages in water services even more acute.

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<sup>5</sup> <http://www.southoxon.gov.uk/sites/default/files/Water%20Cycle%20Study%20Phase%20I%20-%20S%20Oxfordshire%20District%20Council.pdf>