

Wantage Neighbourhood Development Plan 2023-2031

**A report to Vale of White Horse District Council on
the Wantage Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by the Vale of White Horse District Council in December 2024 to carry out the independent examination of the Wantage Neighbourhood Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 17 January 2025.
- 3 The Plan is a good example of a neighbourhood plan. It includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It includes policies on environmental and landscape issues and to safeguard community assets.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should extend slightly beyond the neighbourhood area to include the recently-constructed homes off King Alfred Way.

Andrew Ashcroft
Independent Examiner
12 March 2025

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Wantage Neighbourhood Development Plan 2023-2031 ('the Plan').
- 1.2 The Plan was submitted to Vale of White Horse District Council (VWHDC) by Wantage Town Council (WTC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises indirectly from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance, and sustain the role of the town centre.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by VWHDC, with the consent of WTC, to conduct the examination of the Plan and to prepare this report. I am independent of both VWHDC and WTC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Local Character Assessment.
- the VWHDC SEA/HRA screening reports.
- the representations made to the Plan.
- WTC's responses to the clarification note.
- the adopted Vale of White Horse District Local Plan Parts 1 and 2.
- the Vale of White Horse Local Development Scheme (September 2023)
- the National Planning Policy Framework (December 2023).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 17 January 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the way in which the Plan has been developed.

The update of the NPPF in 2024

3.4 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.5 On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Plainly the Plan was submitted earlier in the year in that context. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

3.6 Paragraph 6.2 of this report sets out the full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), WTC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It sets out key findings in a concise report which is supported by more detailed appendices. The appendices helpfully reproduce some of the material used by WTC to engage people in the plan preparation process.
- 4.3 Section 5 of the Statement comments about the initial stage of community engagement. Section 6 then comments about the more recent stages of consultation and engagement which started in November 2020.
- 4.4 Paragraphs 6.4 to 6.9 of the Statement provide specific details on the consultation processes that took place on the pre-submission version of the Plan (June to July 2022).
- 4.5 Appendix 9 of the Statement also provides the details of the ways in which the Plan was refined because of this process and the detailed comments received. This helps to describe the way in which the Plan evolved.
- 4.6 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. VWHDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.7 Consultation on the submitted plan was undertaken by VWHDC. It ended on 21 November 2024. This exercise generated representations from the following organisations:

- Clients of Delancey
- Vale of White Horse District Council
- Historic England
- Pye Homes
- Thames Water
- Natural England
- National Gas

- National Grid
- Oxfordshire County Council

4.8 Comments were also received from five parishioners.

4.9 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Wantage. Its population in 2011 was 11327 persons living in 4867 households. It was designated as a neighbourhood area on 6 January 2014. It is approximately 15 miles to the south-west of Oxford.
- 5.2 The town is strategically located to the immediate north of the Wessex Downs. It has an attractive urban form based on Market Place which is the historic focus for Wallingford Street (leading to the east), Newbury Street (leading to the south), and Mill Street (leading to the west). St Peter and St Paul's Church is immediately to the west of the Market Place. The historic core of the town is a conservation area.
- 5.3 The built-up area of the town is in the northern part of the neighbourhood area. Immediately to the south of the built-up area is land which forms part of the North Wessex Downs National Landscape and the Letcombe Brook (a chalk stream) which flows through the centre of the town.

Development Plan Context

- 5.4 The Vale of White Horse Local Plan (Part 1): Strategic Sites and Policies was adopted in December 2016. It sets out the basis for future development in the District up to 2031. All the policies in this part of the Local Plan are strategic policies of the development plan. The Vale of White Horse Local Plan (Part 2): Detailed Policies and Additional Sites was adopted in October 2019. It is this broader development plan context against which I am required to examine the submitted Neighbourhood Plan.
- 5.5 Wantage is identified as a Market Town within the South East Vale Sub-Area in Local Plan Part 1 (Core Policy 3). The Local Plan comments that market towns are defined as settlements that can support the most sustainable patterns of living within the Vale through their current levels of facilities, services, and employment opportunities. The Local Plan also advises that market towns have the greatest long-term potential for development to provide the jobs and homes to help sustain, and where appropriate, enhance their services and facilities to support viable and sustainable communities in a proportionate manner.
- 5.6 The strategy for the South East Vale Sub Area provides a comprehensive context for development in and around the neighbourhood area as follows:

'The South East Vale Sub-Area will consist of thriving communities that have benefited from sustainable growth and the successful delivery of major infrastructure. The area will continue to be a vital economic area for Oxfordshire, including employment of international importance, where new jobs have been provided alongside housing and community facilities.

Wantage and Grove will be places where people are proud to live and work and recognised as a vital part of the Science Vale area. Growth in these settlements will have been balanced alongside the delivery of community facilities. This will have

included new schools and significant highway improvements, including the Wantage Eastern Link Road and the Grove Northern Link Road. The area will benefit from improved public transport and strategic growth in these settlements will have provided more local job opportunities.

The ecological value of the Letcombe Brook as an important wildlife habitat will have been enhanced. The strategic development sites will have successfully extended the network of green spaces in the area for both recreation and wildlife benefits. Strategic development in Harwell and Milton parishes, to the west of Didcot, will have provided a sustainable urban extension of high-quality homes and community facilities. The strategic road and public transport improvements identified in the Science Vale Area Strategy will have been delivered and will be helping to reduce traffic congestion.

The town centre in Wantage will have been conserved and enhanced and the local centre in Grove will have been strengthened. The countryside and villages will have maintained their distinctive character. The Larger Villages will have retained their separate identities and their services will provide for residents' day-to-day needs. New residents in the villages will be helping to sustain the services and social life of the rural communities.'

- 5.7 The Basic Conditions Statement usefully highlights the key policies in the development plan and how they relate to policies in the submitted Plan. The submitted Plan has been prepared within its wider development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.
- 5.8 VWHDC is working with South Oxfordshire District Council on a Joint Local Plan for the two districts. Once adopted it will replace the existing development plans. The Local Development Scheme (September 2023) anticipates that the emerging Plan will be adopted in December 2025.

Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 17 January 2025. I approached it from the A34 to the east. This helped me to understand its position in the wider landscape in general, and its accessibility to the strategic road network. I saw the importance of the recently-opened King Alfred Way.
- 5.10 I looked initially at the proposed local green spaces to the east of the town.
- 5.11 I then looked at the town centre. I saw its attractive environment and built format around Market Place. I saw the healthy range of local and national retailers, including a Waitrose store. I then walked to the Kings Place Shopping Centre and saw its connections to Market Place via Grove Street.
- 5.12 I took the opportunity to walk along Church Street to St Peter and St Paul's Church. I saw the way in which it related to Church Street, Priory Road, and Market Place.

- 5.13 I walked to the west to the Benjamin Millenium Park. I noted that it was an attractive area that was enjoyed by all ages.
- 5.14 I then drove to East Challow along both Ickleton Road and Challow Road. Travelling on both roads highlighted the relationship between Wantage and East Challow.
- 5.15 I then drove to the south of the town along the A338. This highlighted the relationship of the neighbourhood area to the North Wessex National Landscape.
- 5.16 I left the neighbourhood area on the A338 (to the north) and drove to Grove. This part of the visit helped me to understand the relationship between the two settlements.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

- 6.3 For the purposes of this examination, the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Wantage Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the Vale of White Horse Local Plan 2031;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy, including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on development and environmental matters. It recognises the importance of the retail and commercial facilities in the town centre, and its community facilities.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for the town centre (Policy 1), and for employment sites (Policy 2). In the social dimension, it includes policies on local green spaces (Policy 8), the Manor Road Recreation Area (Policy 9), and on community assets (Policy 3). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policies 3-5), and green infrastructure (Policies 6 and 7). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in the District in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject

to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, VWHDC undertook a screening exercise in January 2022 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environmental Assessment.

Habitats Regulations Assessment

- 6.15 VWHDC also prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It assesses the potential impact of the Plan's policies on the following protected sites:
- Cothill Fen SAC;
 - Hackpen Hill SAC;
 - Little Wittenham SAC; and
 - Oxford Meadows SAC.
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns regarding either neighbourhood plan obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of the regulations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and WTC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land. It also includes a community aspiration.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on each of the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan

- 7.8 The Plan is well-organised and presented. It makes an appropriate distinction between the policies and their supporting text. The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.9 The Introduction defines the neighbourhood area (in Figure 1). Whilst the Plan period is indicated on the front cover of the Plan, I recommend that it is also referenced in the Introduction to comply with the prescribed matters listed in paragraph 2.6 of this report.

At the end of paragraph 1.2 add: 'The Plan period is 2023 to 2031.'

- 7.10 The Introduction also comments about the basic conditions.
- 7.11 Section 2 comments about Wantage to good effect. This part of the Plan provides a solid context for several of the policies.
- 7.12 Section 3 sets out the vision and objectives for the Plan. It makes a strong functional relationship between the various issues and, in several cases, they set a useful context for the resulting policies. The Vision neatly summarises the approach taken as follows:

'Wantage will remain a thriving market town, with its retained historic and architectural character, busy town centre and attractive network of green spaces and links to the surrounding countryside and AONB. Emphasis will be placed on commercial and retail

success to meet the demands of changing economic practices, greater accessibility and increased mix of housing and recreation whilst protecting the landscape setting, green infrastructure, and community assets.'

- 7.13 The objectives provide a structure for the various policies in the Plan.
- 7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy 1: Town Centre Policy Area

- 7.15 The Plan comments that to sustain and improve the retail and cultural value of the town centre the emphasis must be on not just resisting the loss of shops but to positively encourage the reuse of existing floor space and land in the area for retail and café/restaurant uses. The Plan comments that its vision is to expand the shopping space and create more pedestrian space within Market Place. It also advises that working with neighbouring parishes to find somewhere for long term parking will free up town centre parking for visitors, and that ensuring that buses have an interchange outside Market Place, so that Market Place is simply a drop-off/pick-up point, will free up space.
- 7.16 I looked carefully at the town centre during the visit. I saw its attractive environment based on Market Place, and the healthy mix of national and independent retail and business units.
- 7.17 In general, the policy takes a positive approach to the town centre and has regard to Section of the NPPF and is in general conformity with the strategic policies in the development plan. However, to bring the clarity required by the NPPF, and to allow VWHDC to be able to implement the policy through the development management process, I recommend a series of modifications to the wording of the policy and the supporting text. The modifications clarify the intentions of the policy rather than alter its focus.
- 7.18 I also recommend that the policy is presented in a consistent typeface.
- 7.19 The VWHDC's Heritage Team suggest a modification to the policy so that it sets out that new retail space, particularly in the historic core of the town, should implement sympathetic design that is in keeping with the character of Wantage and the Joint Design Guide. This approach would be a useful addition to the policy. However, it is not required to ensure that the Plan meets the basic conditions. In addition, VWHDC will be able to apply its own design policies to development proposals in the town centre through the development management process.
- 7.20 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

In the second part of the policy replace 'permitted' with 'supported'

Replace the third part of the policy with: 'Elsewhere, proposals for new retail or other main town centre employment uses will be supported where they follow

the sequential approach to site selection use as set out in the Local Plan and meet adopted car parking standards.'

In the fourth part of the policy replace 'must' with 'should'

Reconfigure the format of the policy so that it has the same typeface (as used in the first and third parts)

Replace the final sentence of paragraph 4.1.3 with: 'Development proposals which work towards delivering this vision will be supported.'

Replace paragraph 4.1.4 with: 'To deliver this vision, further car parking is likely to be required. As such, development proposals which deliver additional parking would be supported.'

Policy 2: Protection of Employment Sites

7.21 The policy and the supporting text advise that Wantage relies heavily on employment opportunities outside of the neighbourhood area. In this context, it advises that employment uses within the Wantage development boundary should be encouraged and supported and that provision is made for companies to expand or relocate to other premises. The Plan also advises that there is a need to ensure a balance between housing and employment and mixed-use schemes are encouraged to help maintain local employment wherever possible.

7.22 Clients of Delancey comment that:

'we note that this Policy allows for the redevelopment of, or extensions to, existing employment land that fully retain existing uses. This aspect of the Policy does not allow for the redevelopment of existing employment sites for alternative employment generating uses. This is a significant concern as it artificially restricts the ability of such sites to respond to the needs of occupiers. We raise concerns to this Policy on the basis that it only allows for the redevelopment of existing employment sites where it would result in a mixed-use scheme. In our view, if it can be demonstrated that (subject to appropriate material considerations) that an employment site could be released for other purposes, there is no need to stipulate that the end result must be in a mixed use. That significantly restricts the ability of existing employment sites to be redeveloped for other purposes and could, in theory, lead to sites remaining vacant (for example if the existing (planning) use cannot be retained, or if a mixed-use scheme cannot be accommodated (for whatever reason)).'

7.23 In its response to the clarification note, WTC commented that:

'our priority is to retain employment opportunities rather than rigidly protecting specific employment uses. We acknowledge that employment needs evolve and that a change in use may still maintain or even increase employment levels. We are open to refining the wording to clarify that the policy supports the retention of employment land, while allowing for shifts in the type of employment use where appropriate.'

7.24 I have considered the policy very carefully. On the one hand, WTC is seeking to retain employment opportunities in the town and to prevent it from becoming a dormitory

town. Such an approach would help to achieve sustainable development. However, on the other hand, the protection of employment sites and/or proposals for the redevelopment of employment sites for alternative uses are already addressed in a comprehensive way in Part One the adopted Local Plan by the following policies:

- Core Policy 28: New Employment Development on Unallocated site;
- Core Policy 29: Change of Use of Existing Employment Land and Premises; and
- Core Policy 15: Spatial Strategy for the South East Vale Sub-Area.

7.25 In addition, the second part of the submitted policy either repeats elements of the strategic policies in the Local Plan or is more restrictive than those policies. Furthermore, this part of the policy does not make the distinction between strategic employment sites and other sites as highlighted in Core Policy 15.

7.26 In these circumstances, I recommend that the first element of the policy is recast and simplified, and that the second part is deleted. This will ensure that the policy is in general conformity with the strategic policies in the development plan. It will also ensure that the policy can be applied in a consistent way by VWHDC through the development management process. I also recommend consequential modifications to the supporting text.

7.27 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with: ‘Proposals for the extension of existing commercial buildings or for the redevelopment of existing employment premises for other employment uses will be supported, where they comply with the development management policies of the development plan.’

Replace paragraph 4.2.2 with: ‘Policy 2 of the Plan seeks to consolidate the approach taken towards employment uses in the adopted Local Plan. Core Policies 15, 28 and 29 provide a context within which the District Council will determine proposals which involve the loss or the reduction of existing employment floorspace.’

Policy 3: Design - General Principles

7.28 This is the first of three design policies. Each policy has a distinctive role and purpose and I will assess each in turn against the basic conditions.

7.29 The policy emphasises important the following design principles:

- firstly, the town occupies a prominent location at the foot of the North Wessex Downs on the edge of the Vale of White Horse, and there are many opportunities within the town to glimpse the surrounding countryside, which help define its special character; and
- secondly, that the cycling policies of the District Council and County Council are supported and enhanced in Wantage.

- 7.30 I recommend that the policy is modified so that it can be applied in a proportionate way. This is important given its specific focus on views and cycling.
- 7.31 The first element of the policy comments about views into and out of the town. I noticed several such important views during the visit. However, they are not defined in the Plan and, as VWHDC comment, this element of the policy would be difficult to implement throughout the Plan period with any clarity. I have considered this matter carefully. On the balance of the evidence, I recommend that the policy is modified so that it has a more general format which focuses on the need for development proposals to retain the distinction between the built-up areas of the town and the surrounding countryside including the North Wessex Downs.
- 7.32 The second element of the policy addresses cycling in a positive way. I recommend two modifications to the wording used (as suggested by VWHDC) to bring the clarity required by the NPPF.
- 7.33 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: ‘As appropriate to their scale, nature, and location, the design of development proposals should respond positively to the following principles:

Replace i) with ‘where relevant, they retain the distinction between the built-up areas of the town and the surrounding countryside including the North Wessex Downs; and’

Replace the opening element of part ii) of the policy with: ‘where appropriate and feasible, they deliver improved provision for cycling throughout the neighbourhood area having regard to Plan E: Wantage Proposed Cycle Routes. This may be in the form of a financial contribution and/or appropriate design measures, including;’

At the end of criterion b) add: ‘New cycle routes should be well overlooked wherever practicable.’

Policy 4: Design - Character Areas

- 7.34 The Plan advises that this policy complements the Vale of White Horse Design Guide by identifying six different character areas in the town and setting specific design parameters for each area. Further details of the characteristics of each area are included in the Local Character Assessment report in the evidence base. The policy also looks to refine the Local Plan policy on housing density by indicating the appropriate densities for each character area of the town, based on the existing common densities. The Plan recognises that some proposals for new housing in the Town Centre Conservation Area may not be able to meet the required density standard and accommodate sufficient off street car parking spaces.

- 7.35 In general terms, this policy gets to the heart of design in the neighbourhood area throughout the Plan period. It is based on the comprehensive and well-considered Local Character Assessment.
- 7.36 VWHDC suggests a package of modifications to the policy. In summary the suggested modifications:
- make specific reference to the Local Character Assessment;
 - introduce a proportionate element into the policy wording used in each of the Character Areas; and
 - refine some of the specific wording used in the Character Areas.
- 7.37 These various modifications will bring the clarity required by the NPPF and allow developers and VWHDC to be able to apply its provisions through the development management process. I recommend accordingly.
- 7.38 I also recommend that the map on pages 39 is improved both generally, and to show the Character Areas in a clearer fashion.
- 7.39 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the social and the environmental dimensions of sustainable development.

Modify the policy as set out in VWHDC’s comment 13

Improve the clarity of the map on page 39 showing the Character Areas.

Policy 5: Design - Housing Types

- 7.40 This policy requires housing schemes to focus on delivering housing types that will meet the needs of the local community both in terms of size to suit new entrants into the housing market and downsizers. It also requires housing development to fit the character of the areas, which in Wantage is mainly two, or two and a half storey, semi-detached homes. In addition, the policy encourages housing schemes to make provision for bungalows within their mix of types and comments that such homes remain popular with older households.
- 7.41 I am satisfied that the policy takes an evidence-based approach to housing types. Within this context I recommend a series of modifications to the policy and the supporting text to bring the clarity required by the NPPF. They do not affect the intentions of the policy.
- 7.42 I have noted the County Council’s comment that the policy could encourage single storey dwellings to comply with the optional Building Control Approved Document M4(2) which increases levels of accessibility. Plainly such an approach would have merit. However, it is not required to ensure that the Plan meets the basic conditions.
- 7.43 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery the social and the environmental dimensions of sustainable development.

In the first part of the policy delete ‘to’

In the second part of the policy replace:

- **‘encouraged’ with ‘supported’**
- **‘provided they are in accordance with the development management policies of the development plan’ with ‘where they otherwise accord with development plan policies’**

In paragraph 4.5.1 replace the final sentence with:

‘For example, the Joint Housing Needs Assessment produced as part of the evidence base for the emerging Joint Local Plan 2041, sets out the following housing mix for new residential development in the Vale of White Horse:

Market: 1 bed (5%), 2 bed (10%), 3 bed (70%), 4 bed (15%).

Affordable: 1 bed (13%), 2 bed (34%), 3 bed (40%), 4 bed (13%).’

Policy 6: Green Infrastructure Network and Biodiversity

- 7.44 This policy proposes that a Green Infrastructure Network is established to aid the connection of green spaces, Letcombe Brook and other watercourses, with the Town Centre and countryside, using footpaths, cycleways and the Wilts and Berks Canal Towpath. Its purpose is to encourage development proposals that may affect the Network to contribute to its improvement and to assist in securing its connectivity, ecological or recreational value.
- 7.45 Pye Homes comments about the wording used in the first criterion of the policy. It advises that:
- ‘the Policy effectively serves to prevent any development that would change and/or not enhance the use or the appearance of land. Such an approach goes well beyond any form of local or national policy. It serves to prevent the achievement of sustainable development*
- 7.46 I have considered this issue carefully. As submitted the policy is unnecessarily detailed and I recommend modification to address this issue. The modified policy requires that development proposals respond positively to the character and appearance of the network.
- 7.47 VWHDC comment about:
- the biodiversity net gain target included in the policy (and its relationship to that in the emerging Local Plan);
 - a potential expansion to the policy to focus on protected and priority species and habitats and designated sites; and
 - revisions to Map D.
- 7.48 I have considered VWHDC’s comment about biodiversity net gain and the content of the emerging Local Plan. However, at this point the Local Plan has not been examined,

and no detailed local evidence on biodiversity net gain is presented in the neighbourhood plan. In the round, given that the submitted policy simply restates national policy on biodiversity net gain I recommend that this element is deleted. I recommend as consequential modification to the title of the policy. I have noted VWHDC's comment suggesting an expansion of the policy to focus on protected and Priority species and habitats and designated sites. Such an approach would have merit. However, it is not required to ensure that the Plan meets the basic conditions

- 7.49 VWHDC comment that Plan D (which supports the policy) includes areas which have now been developed, such as the Elmbrook Court Care Home on Grove Road, as green areas. Likewise, it also includes parts of the Crab Hill Strategic Allocation as green areas which are likely to be developed as housing. Plainly these matters are inconsistencies and which will not bring the clarity required by the NPPF. I recommend that any developed and allocated sites as shown on Plan D are deleted.
- 7.50 Oxfordshire County Council expresses concern that one of the areas identified adjacent to Seesen Way includes land which is part of Stirlings Care Home. I have considered this matter carefully. On the balance of the evidence, I am satisfied that it is appropriate for the land concerned to be included within the Green Infrastructure Network, and that its inclusion does not affect the day-to-day operation of the Care Home.
- 7.51 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery the social and the environmental dimensions of sustainable development.

Replace the policy with:

'The Plan identifies a Green Infrastructure Network, as shown on the Wantage Green Infrastructure Concept Map.

Development proposals on land within the Green Infrastructure Network should:

- **respond positively to the character and appearance of the network; and**
- **ensure that their landscape schemes, layouts, access and public open space provision and other amenity requirement contribute to the maintenance of the Network, and, where practicable, its enhancement.'**

Revise the title of the policy to read 'Green Infrastructure Network'

Delete any sites which have been developed from the Green Infrastructure Network as well as Fuller's Field.

Policy 7: Green Infrastructure - Letcombe Brook

- 7.52 The Plan advises that the Brook and its corridor are of great importance to the character and landscape of the town. It also comments that it is a vital element of the Green Infrastructure and has several important functions – as a landscape feature, for biodiversity especially as a green corridor to allow movement of species, flood alleviation, for recreation, as a water resource and to allow access for river maintenance.
- 7.53 I saw the importance of the Brook during the visit.

7.54 As submitted, the scope of the policy is unclear both in general and on the extent to which its intention is that development proposals within or adjacent to the Letcombe Brook should respond positively to its biodiversity value. In its response to the clarification note, WTC advised that:

'the policy aims to ensure that development both protects Letcombe Brook from harm and actively improves biodiversity. We see these as separate points, as it is possible for a development to enhance biodiversity while still negatively impacting parts of the area. We are happy to adjust the wording to make this distinction clearer.'

7.55 VWHDC suggests a package of modifications to the policy. In summary the suggested modifications:

- resolve the matter about where the policy would apply;
- refine its proportionate element; and
- refine some of the specific wording used.

7.56 I am satisfied that these various modifications will bring the clarity required by the NPPF and allow developers and VWHDC to be able to apply its provisions through the development management process. I recommend accordingly.

7.57 The first sentence of paragraph 4.7.2 repeats the final sentence of the previous paragraph. I recommend that it is deleted. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the social and the environmental dimensions of sustainable development.

Modify the policy as set out in VWHDC's comment 20

Delete the first sentence of paragraph 4.7.2

Policy 8: Green Infrastructure - Local Green Spaces

7.58 This policy proposes several important green spaces in the town to be protected from development by their designation as Local Green Spaces (LGS). These are shown on Plan F Wantage Local Green Spaces on the following page and in more detail in Appendix 2.

7.59 I looked at the proposed LGSs during the visit. I saw their obvious importance to the form and character of the town. Betjeman Park was particularly impressive.

7.60 Pye Homes comments about the wording used in the policy. In general terms the policy seeks to apply the matter-of-fact approach taken in paragraph 107 of the NPPF. However, I recommend that the final part of the policy and paragraph 4.8.2 are modified to ensure that they have regard to national policy. I also recommend that the NPPF paragraph numbers in paragraph 4.8.1 are corrected so that they reflect those in the December 2023 version (and against which this Plan has been examined).

7.61 The illustration of the proposed LGS designation at Betjeman Park is included in Appendix 2, and contains a note that sets out that a 2-metre buffer has been included within the LGS as the trustees of the site require a 2-metre strip to be set aside for the future provision of vehicular access. VWHDC suggest that rather than inserting a buffer

strip into the Local Green Space, it would be more appropriate to amend the boundary of the LGS to remove the 2-metre strip. On the balance of the evidence I recommend that the 2-metre strip is removed from the proposed designation. This will accord with paragraph 105 of the NPPF which requires that LGSs should be capable of enduring beyond the end of the Plan period

- 7.62 Oxfordshire County Council (as a landowner) comments about the proposed LGS C (Humber Ditch and adjacent green spaces) as follows:

‘OCC Property controls the eastern most parcel of land which is described in the document as a small nature reserve owned by Charlton School. This land is in fact owned by OCC but is currently subject to a 125-year academy lease to the Vale Academy Trust who operate the school site on OCC’s behalf. As this is therefore school land OCC Property is concerned about this designation, as it will impose further unnecessary layers of protection on County Council land that is already managed for public benefit. OCC Property would also like to highlight that school playing fields are already protected by Sports England. OCC Property therefore wishes to lodge an objection to the designation of this land as a Local Green Space and request that this parcel of land be removed from the policy designation.’

- 7.63 I have considered this matter carefully. On the balance of the evidence, I am satisfied that the proposed LGS has been appropriately defined and meets the criteria in the NPPF. The County Council does not identify any specific proposals for the development of the site which it owns, and any proposals which may come forward within the Plan period can be assessed against Policy 8 of the Plan in general, and the way in which it would represent very special circumstances.

- 7.64 There are inconsistencies between the maps for the individual LGSs (as shown on pages 58-61) with those shown on the amalgamated information on page 26). Whilst they do not affect the judgements about the way in which the LGSs meet the criteria in the NPPF, it is important that the information in the Plan is consistent. I recommend that this matter is addressed by VWHDC and WTC. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the final part of the policy with: ‘Development proposals on land designated as Local Green Space will only be supported in very special circumstances.’

Modify the boundaries of the LGSs shown on Map F so that they correspond with those shown in Appendix 2.

Delete the proposed 2 metre access strip shown within LGS B on Map F and in Appendix 2.

In paragraph 4.8.1 replace ‘99-101’ with ‘105-107’

Replace paragraph 4.8.2 with: ‘In each case, these green spaces are an integral part of the town. Local Green Spaces have an equivalent planning policy status to that of

the Green Belt and therefore development will only be supported in very special circumstances.'

Policy 9: Manor Road Memorial Recreation Ground

- 7.65 The Plan comments that this policy protects the open space, sports and recreational buildings and land located within the Manor Road Memorial Ground as defined on Plan G.
- 7.66 I saw the importance of the Manor Road Memorial Recreation Ground during the visit.
- 7.67 The policy takes a very positive approach to safeguarding the existing uses at the Recreation Ground and in supporting proposals which would improve the facilities. In this broader context, I recommend that the order of the two components of the policy is reversed so that it has a positive focus. I also recommend that the wording used in each part of the policy explicitly refers to the Recreation Ground.
- 7.68 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Reverse the order of the two parts of the policy

Replace the opening element of the first part of the policy (as submitted) with: 'Proposals that result in the loss of open space, sports and recreational buildings and land, within the Recreation Ground (as shown on Plan G) will not be supported unless:'

Replace the opening element of the second part of the policy (as submitted) with: 'Proposals to improve any of the existing leisure or recreational facilities on the Recreation Ground (as shown on Plan G) will be supported.'

Policy 10: Infrastructure Investment

- 7.69 The Plan comments about the importance of ensuring that the environmental impact of new developments is considered together with the cumulative impact of the housing applications on overall capacity for all local services and infrastructure and to ensure that sufficient water/sewerage/transport/health/education facilities will be available in a timely manner.
- 7.70 The policy takes a general approach. I sought advice from WTC on the extent to which the policy would bring any added value to the local delivery of infrastructure included in the adopted Local Plan (and as implemented by VWHDC through the development management process). In its response to the clarification note, it advised that:
- '(the policy is) trying to explain that if larger scale development proposals do not take into account or address the impact of greater demand on our infrastructure they will not be supported. We were also trying to address the same issue for development outside of our parish that would increase demand or the use of Wantage and its infrastructure - for example the development at East Challow.'*

- 7.71 I have considered this matter very carefully. On the one hand, WTC properly wishes to ensure that the overall capacity of local services and infrastructure is addressed when development proposals are being determined, However, on the other hand, I am not satisfied that the policy brings any added value beyond the way in which VWHDC addresses such matters. In these circumstances I recommend that the policy and its supporting text are deleted.

Delete the policy

Delete paragraphs 4.10.1 and 4.10.2

Policy 11: Community Assets

- 7.72 This policy has two purposes. The first is to protect designated Assets of Community Value from unnecessary loss. The second supports the improvement and extension of the Assets and of other community buildings and associated land in ways that are suitable to their location.
- 7.73 The policy takes a very positive approach to safeguarding Community Assets and in supporting proposals which would improve the facilities. The first part of the policy properly acknowledges that the use of the facility concerned, or its viability, may alter in the Plan period.
- 7.74 In this broader context, I recommend that the order of the two components of the policy is reversed so that it has a positive focus. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Reverse the order of the two parts of the policy

Community Aspiration

- 7.75 The Plan includes a community aspiration on community facilities. It comments that WTC has an aspiration that development proposals will be required to make proportionate financial contributions to key local services and infrastructure improvement projects through planning obligations and the Community Infrastructure Levy as appropriate. It also identifies a series of key projects.
- 7.76 I am satisfied that the Aspiration is locally distinctive and has arisen as the Plan was being prepared. Nevertheless, to ensure that the Aspiration is not considered to be a land use policy I recommend that its presentation box uses a different colour from the land use policies

Use a different colour for the Aspiration presentation box from the land use policies

Other Matters – General

- 7.77 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may

be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for VWHDC and WTC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.78 VWHDC has made a series of helpful comments on the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.79 I also recommend a series of general modifications to the text of the Plan based on VWHDC's comments insofar as they are necessary to ensure that the Plan meets the basic conditions. In the main, they relate to factual corrections and typographic errors. For clarity I use the reference numbers in the VWHDC's representation.
- 7.80 The modifications include the insertion of an additional paragraph in Section 5 of the Plan to advise about the status of the aspirations and actions in the Plan.

The name for the designation Area of Outstanding Natural Beauty (AONB) has recently been changed to National Landscape. All references to the AONB throughout the Plan should be updated to National Landscape accordingly.

The Vale of White Horse Design Guide has now been superseded by the Joint Design Guide covering both Vale of White Horse and South Oxfordshire. All references to the Vale of White Horse Design Guide throughout the Plan should be updated to the Joint Design Guide accordingly.

Replace paragraph 4.0.5 with 'Where practicable, the existing landscape of the Neighbourhood Plan area should be protected for the sake of its own intrinsic beauty, its benefit to the rural character of the Vale of White Horse and for its biodiversity and geodiversity interest.'

In Section 5 add a new paragraph to read:

'5.1.3 This chapter sets out aspirations and actions that cannot be addressed by planning policies within the neighbourhood plan, but which are of importance to the town and which the Town Council and community would like to address through alternative processes. These aspirations and actions address matters which are outside of the planning system and will not form part of the statutory development plan or impose any requirements on developers and landowners.'

Revise the definitions in the Glossary (to accord with VWHDC comment 29).

In Letcombe Brook Planning Guidance (appendix 1) the guidance contains an out-of-date replication of the policy relating to the Letcombe Brook (now Policy 7 in the Plan).

I recommend that this section of the appendix is deleted to avoid confusion and repetition with the Plan, and to bring the clarity required by the NPPF.

In the Character Assessment apply VWHDC comments 34-37.

Other Matters – The Referendum Area

- 7.81 Since the neighbourhood area was designated major residential development has taken place to the east of the town off King Alfred Way. Whilst most of this residential development has been within the neighbourhood area, its eastern extent is not.
- 7.82 VWHDC suggests that the referendum area is extended to include the relevant properties. I have considered this matter carefully. On the balance of the evidence, I am satisfied this this would be an appropriate way forward. I have reached this conclusion for two principal reasons. The first is that the properties concerned are within confines of the town as now physically defined by King Alfred Way. The second is that the occupiers of the houses concerned will have the opportunity to access the retail, commercial, community, and leisure services within the town and which, in different ways, the Plan addresses. I recommend accordingly.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area, to designate local green spaces, and to sustain the viability and vitality of the town centre.
- 8.2 Following the independent examination of the Plan, I have concluded that the Wantage Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

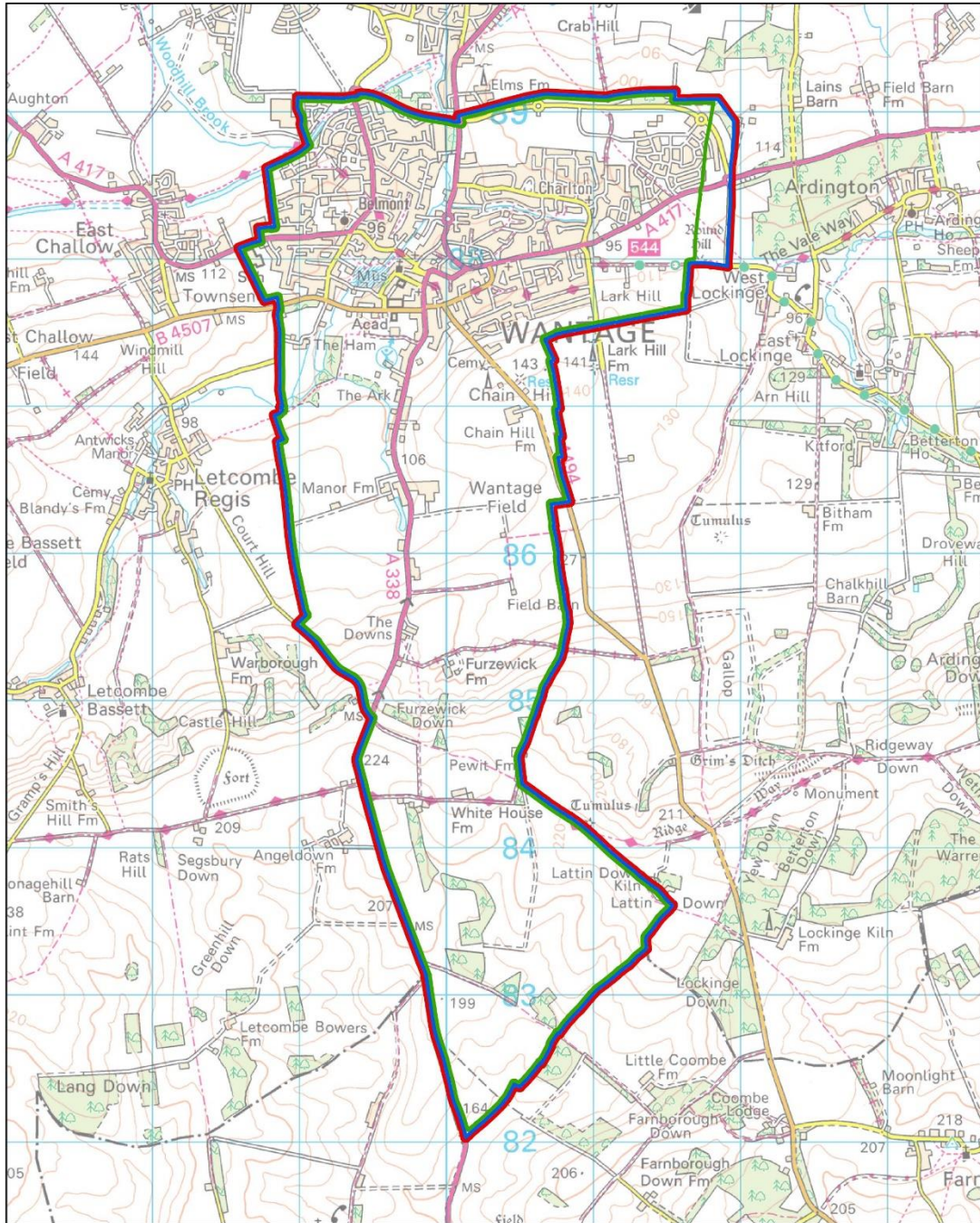
- 8.3 On the basis of the findings in this report, I recommend to Vale of White Horse District Council that, subject to the incorporation of the modifications set out in this report, the Wantage Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. I have addressed this matter in paragraphs 7.81 and 7.82 of this report. On this basis I recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 6 January 2014 together with the area to the east of the town where new homes have been constructed off King Alfred Way since the neighbourhood area was designated. The extended referendum area is shown in Appendix 1 of this report.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed and informative.

Andrew Ashcroft
Independent Examiner
12 March 2025

Appendix 1: Wantage Neighbourhood Plan Referendum Area



Wantage Neighbourhood Area March 2025

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1:35,000

- Wantage Neighbourhood Plan Area
- Wantage Parish Area
- Wantage Referendum Area