

**Response to Examiner’s Notes for Clarification sent to
Wheatley Neighbourhood Plan Committee**

Reference	Response
H2	<p>The simple answer is “No, the policy is intended to cover more than the views referred to in paragraph 8.7”.</p> <p>Wheatley is not a “pretty Cotswold village” where the stone cottages provide a picturesque setting. The centre of the village lies in a cleft in the landscape which is tightly constrained with no opportunities for development. Therefore, any development can only take place towards the perimeter of the village and it is from precisely these areas of the village that residents can experience the marvellous landscapes and views that are a feature of Wheatley and its surroundings. Preservation of the landscapes and views that are of local significance and define the unique character of Wheatley is critical and as such it is important to add policy H2 to emphasise the tenets of NPPF para 170 to any prospective developer.</p> <p>WNP_01 and Appendices 1 and 2 are well illustrated with views around Wheatley and at the Examiner’s discretion the narrative can be amended to refer to each of the views that are illustrated and also to provide further local history.</p> <p>“Castle Hill” is only one example. It is the southern landscape of the village. It was known in the 13th century for its 'monastery' or 'castle', which was the standing stone ruin of a Roman villa. Excavated in the 1880s, it was re-buried by the farm-owner to discourage visitors. Close by lies an early Saxon cemetery in an area redolent with Saxon names - <i>Cuthwine</i> (Cuddesdon) and <i>Badda's Combe</i> (Badcombe [Hedge]). Ridge-and-furrow stripe the whole hillside where even today the plough blade length is controlled.</p> <p>The landscape reflects the phases of 2000 years of agriculture. A stunning panorama enjoyed from the top of the hill enriches further: Wittenham Clumps (St Birinus's Dorchester); the Chilterns ridge (The WNP Committee corresponded with Chilterns AONB) and the farmland 'plain' at its base; the poplar-lined Coffin / Bridal Road from Wheatley medieval chapel to Cuddesdon church. To the west lies Shotover Estate, (Royal Forest until mid-1600s) and Coombe Wood, a 12th century donation of Royal Forest to Abingdon Abbey for use as a Warren. In many ways the history of such landscapes is as central to their 'character and beauty' as their shapes.</p>

<p>H3</p>	<p>During some of the stakeholder meetings organised by OBU it was stated that whereas outline planning permission had been applied for it was by no means certain that the site would be used for residential development. Stakeholders were told that interest in the site had been expressed from foreign educational establishments.</p> <p>Furthermore, the site was not due to be vacated until 2021 which was five years distant from when the WNP Committee was convened.</p> <p>The housing needs survey highlighted that it would be desirable to satisfy the community's needs in a shorter time scale and this is reflected in policy H3 which would be applied to any development in the designated area prior to 2021 and of course thereafter, including OBU. So, proposals for housing contained in the WNP are intended to be additional to that proposed for the OBU site subject to the constraint however that the overall total of housing can be supported by local facilities and infrastructure. It should be noted that the OBU proposals of mid-August 2016 for up to 600 homes (Stakeholder Consultations, 2016-17), and then for a revised 500 homes (Outline Planning Proposal) have been opposed by WNP Committee from the outset on grounds of connectivity, integration and infrastructure.</p> <p>At present only policy SPES1 refers explicitly to policy H3. WNP01 can be amended to refer to H3 in SPOBU and SPES2/3/4. However, it should be noted that the subsequent delays to the Local Plan have eroded any realisation of housing in Wheatley prior to potential housing at OBU.</p>
<p>T1</p>	<p>Figure 4.1 in WNP01 shows the key concerns of residents and traffic comes top of the list. Like many villages in rural UK Wheatley has medieval infrastructure trying in vain to deal adequately with 21st century traffic. However, due to its location, Wheatley is particularly prone to through traffic, congestion and pollution issues. Policy T1 has been derived from local knowledge and is intended to ensure that any development supports local sentiment and does not exacerbate the already critical conditions.</p> <p>For example, the community bakery (Cornfield, High Street,) is keen to move its central Wheatley Bakery to WHE15 (Ms Tomb's Field) to remove the need for its vans serving more distant bread shops (Thame and Long Crendon) to enter Wheatley High St. This will be of local value to village roads, but perhaps not to the 'Highway network' itself.</p>
<p>SCI1 & 2</p>	<p>The WNP Committee welcomes the Examiner's suggestion to address the distinctions between the amenities (a-g) and recreational facilities (i-h) separately and to that end is happy to create an additional policy SCI3 Recreational Facilities</p> <p>The parcels of land can be identified as:- h) Howe Trust Land</p>

This is a parcel of land identified as WHE10 in Figures 2.2 and 2.3 of Appendix 2. It is held in Trust for village and mainly used for allotments.

i) Recreation Land

There are three small parcels of land within the village that comprise land for recreation. Two of them are identified in Figure 3.1 of Appendix 1. The third parcel lies in the easterly section of the village and is smaller in size to the ones shown in Figure 3.1. All three parcels are shown in Figure 4.15 of WNP01. Recreation land in this WNP is used to describe land to be used by small children, for Maypole dancing, for fete type events etc. It is not intended for use for organised sports by teenagers and/or adults.

j) Sports Fields

With respect to the NDA, the location of many of the sports fields used by the residents is not uniform in nature. These comprise tennis courts (some lie inside the NDA, some lie outside), rugby pitches (all outside the NDA) and football pitches (some lie inside the NDA, some lie outside). When the NDA was specified the possible significance of the designation with respect to the sports fields was neither recognised nor considered as important especially as the emerging Local Plan proposed development only on the “built form” of the OBU site. The outline planning application however proposes development over a much greater area on the OBU site part of which lies outside the NDA and therefore WNP policies cannot apply to these areas. This conflict cannot be considered acceptable as development on the any part of the OBU site (inside or outside of the NDA) affects the WHOLE community. It may be “correct” that the WNP cannot have policies that preserve the amenities enjoyed currently by the community. However, can it be “right” that the unforeseen consequences of a particular designation can take priority over the legitimate concerns of the community? Comments from the Examiner on how to reconcile this conflict would be welcome.

There are some concerns regarding the erosion of sports facilities. Primary Academy, Wheatley: has a field which once supported 5 pitches (football, hockey, rugby), a running track, cricket square and wicket, two long jump pits and a high jump area, a swimming pool and 6 tennis courts. All for school and community use. None exist today except for one junior pitch.

(WPC, ODST and the Primary School are setting up a trust to develop the field but progress is slow)

Wheatley Park Academy, Holton: had 2 hockey pitches, 6 tennis courts, swimming pool (but not for community). These no longer exist. There is access to an SODC run Sports Centre. The Campus is not an open recreation area.

OBU Wheatley Campus, Holton: had 2 artificial pitches for football, rugby, lacrosse and US football pitches, cricket pitch and, nets, a 9-hole golf course. All except the cricket facilities are disused and/or in disrepair. There have been plans to revitalise the cricket activities and provide a green recreation area at the west end of the campus.

	<p>Holton Playing Fields owned by Wheatley Parish Council: 2 football pitches, 1 rugby pitch, 9 tennis courts, 2 netball courts, 1 floodlit pitch and training grids for summer athletics. These are used Wheatley Park Academy 9am-5pm during weekdays in term. They are managed and maintained by the Wheatley Playing Field Trust. Including the pavilion these facilities are available for hire by local clubs.</p>
VCE1	<p>This policy echoes policy T1 and is intended to apply to any development. Sites in the village enhancement plan would be linked by a proposed, mainly flat, Green Route thereby making walking/cycling a viable option for access to the village centre. The OBU site would not have this benefit because of general lack of proximity and, to some extent, local topology. Therefore, it is likely that journeys to the village centre from the OBU site will be made by car thereby exacerbating traffic and parking problems in the village centre.</p> <p>The policy is also intended to guide future development.</p>
E1	<p>The village enhancement plan is described in section 10 of WNP01. The genesis of the plan arose from an early version of the Local Plan 2032 Refined Options wherein “mixed development” was envisaged for the OBU site. Given that many of the businesses on the Littleworth site were related to car maintenance it seemed reasonable to consider their relocation to the buildings and facilities on the OBU site devoted to Courses on Automotive Engineering. However, although “mixed development” was dropped from subsequent versions of the Local Plan the WNP Committee decided to pursue the idea of relocating the Littleworth businesses and using the vacated site for housing.</p> <p>An alternative relocation site had to be identified and the obvious choice would be adjacent to the existing industrial area at the eastern part of the village. This industrial area has grown in a somewhat unstructured manner over the years so a development that would improve access, roads and parking in addition to providing housing and new business opportunities combined with rationalising existing activities seemed to be appropriate for a WNP.</p> <p>When first conceived it was considered that the village enhancement plan could provide houses on a timescale shorter than that envisaged for the OBU site. For various reasons outside the control of the WNP Committee it appears that this possible advantage has been eroded (see response to H3 above).</p> <p>The OBU site has only been the subject of outline planning permission. While acknowledging that it is unlikely that any buyer would pay a premium for a site with outline planning permission and subsequently not proceed with housing OBU has declared that there has been interest from organisations that may not want to use the site for housing. Under these circumstances it would seem only prudent</p>

	<p>that the WNP should not rely solely on the OBU site for the provision of future housing in the village (see response to H3 above).</p> <p>This prudent approach to future housing also provides a valuable opportunity to improve the village by modernising the centre of Littleworth, rationalising the distribution of industry and for the first time creating a green spine through the village.</p>
HE1	<p>This policy was specifically included in response to comments from Historic England in the pre-submission consultation where the recommendation was to consolidate part of the narrative into a formal policy.</p> <p>Heritage is important to the village. There have been several recent publications and projects about Wheatley and its history the most recent being the Heritage Trail published by the Wheatley Archive.</p> <p>In Appendix 1 there is a map of the Wheatley conservation area and a table describing the listed buildings.</p>
SPOBU	<p>The policy seeks to allow development of the existing built up area of the site in accordance with the views expressed in LP2034.</p> <p>The site has been assessed as Appendix 2 using the criteria summarised in Figure 2.6 and the evaluation showed that “the site is potentially suitable providing that issues can be mitigated and constraints resolved. These include proximity to A40 dual carriageway and the provision of adequate means of connectivity between the site and the village”.</p> <p>WNP01 did not carry out a viability assessment of the site as this was an SODC Strategic Site and had been included in a study (Click here for details) that “appraised a generic 300 unit brownfield typology” as proposed by LP2034 for the OBU site.</p>
GBBA1	<p>The policy approach was developed in conjunction with SODC following the NPPF revisions in Nov 2018.</p> <p>The policy can only be effective within the provisions of LP2034 so any delays to LP2034 and/or modifications to para 4.121 contained therein will clearly affect this policy.</p>
SPES2	<p>All the businesses were consulted and expressed the opinion that they were not averse to relocation, similarly the leaseholders were consulted and they were not averse to change of use but of course “everything depended on the T&C” which does make the enhancement plan subject to commercial decisions in promoting change of land use for community benefit.</p> <p>The businesses were not consulted regarding relocation outside the NDA as this would contravene Policy E1. However, the WNP Committee recognised that circumstances could force businesses to indeed relocate outside of the NDA. Whereas such an eventuality</p>

	would not be desirable it may be necessary due to circumstances not under the control of any Neighbourhood Plan.
SPES3	Because of the inter-related aspects of the various enhancement sites it is envisaged that there would need to be coordinated development driven by a steering group that could comprise, but not be limited to, Developer(s), SODC and WPC. Details of such a steering group have yet to be established and would depend on how the enhancement proposal was brought to the market to seek planning permission.
SPES4	The site is owned by A.W. Mobbs and he would promote his aspirations for purely commercial purposes on the site to support his existing business which is located on an adjacent site.
SPGR	<p>A map for a Green Route is shown in Figure 2.3 of Appendix 2. There is a section that has met with local resistance and that has still to be addressed and resolved. The “gap” is shown in Figure 3.1 of Appendix 1 in the section lying proximal to WHE18A.</p> <p>Yes, the second sentence is confusing and could be replaced by:- “Any development will be expected to contribute to its provision and maintenance thereby safeguarding the route”.</p> <p>The Green Route does not need a trigger from WNP01. On 2 December 2019, WPC in full session advised that a Green Route was a priority on the WPC Action Plan. At present, it is now being formally drafted. See also Green Route and Enhancement Sites 11.1, 11.2 and 11.4 in WNP01.</p>
Representations	Comments are provided in the following sections and are referenced using the nomenclature cited in the text of the Regulation 16 responses
Response#7	<p>The opinion expressed by this group of Holton residents is typical of how many of the residents in Wheatley and Holton feel. The community as a whole recognises the need for housing and it should be made clear that in canvassing the various opinions in the community the WNP Committee has not encountered any “nimbyism”.</p> <p>The proposal to replace the existing built form with housing is not questioned in principle. It is the quantum of development that causes considerable disquiet and also the extent to which the openness of the whole setting of the site and its Green Belt status is being threatened by a policy of volume dispersal espoused by OBU and by some of the provisions of STRAT14 in the Local Plan LP2034. As the Holton residents note, their concerns were mirrored by the SODC Planning Committee decision to overwhelmingly refuse planning permission (8 against, 1 abstention).</p> <p>In recognising that Neighbourhood Plans should be “community led” the WNP Committee has sought to formulate, in cooperation with SODC, a policy for development on the OBU site that reflects the views of the community.</p>

<p>Response#15 Para#2</p>	<p>Following the local elections in May 2019 the political hue of SODC changed and this has had repercussions for the Local Plan LP2034 which is now under a holding order from the Secretary of State. In agreement with SODC officers, the WNP Committee took the view that unless and until LP2034 was withdrawn or the sections contained therein that affected Wheatley were amended then the submission process for WNP01 should continue and be held at the Examiner’s discretion.</p>
<p>Response#15 Para#3</p>	<p>Following the comments made under Regulation 14 the WNP Committee made particular effort to address these comments. In certain cases (eg Historic England) the WNP Committee introduced additional policies to satisfy any concerns. Textual changes and alterations have been made to comply with regulatory and other issues as acknowledged in para#3.4. It should be noted that any and all changes made to the text of WNP01 following Regulation 14 were made in full consultation with SODC officers. The issues commented upon in paras#3.5-3.7 were not raised by SODC officers so the WNP Committee takes the view that their importance is either of limited import or capable of resolution by clarification and therefore WNP01 as a document should not be dismissed as “flawed”.</p>
<p>Response#15 Para#3 (Continued)</p>	<p>Paras#3.8-3.10 mention several issues and seek to imply that WNP01 is in conflict with LP2034. This is just not correct as indicated in para#9.3 of WNP01. There is however indeed a conflict between “the aspirations for the development of the site” as espoused by OBU and the views held by the majority of residents, an example of which has been discussed in Response#7.</p>
<p>Response#15 Para#3.10 Bullet#4</p>	<p>On the specific issue of vehicle management, WNP01 supports bus access through the site. As part of the Regulation 16 comments the Oxford Bus Company declared that a bus service to replace the U1 service could not be supported unless the development comprised 500 houses (see Regulation 16, Oxford Bus Company Response #12 Policy SPOBU). Accordingly, the WNP Committee has prepared a provisional alternative bus route that involves using the OBU site to provide an extension of the existing Arriva 280 service through Wheatley. This proposal is under consideration by Wheatley Parish Council and Arriva. If implemented it would improve traffic management.</p>
<p>Response#15 Para#3 (Continued)</p>	<p>Paras#3.11-3.17 mention several issues and seek to imply that WNP01 is endeavouring to restrict development in Wheatley. This is just not correct as indicated in WNP01 by its support for STRAT14 in LP2034 and by the proposal for the village enhancement plan. However, there are legitimate concerns about infrastructure regarding schools, provision of GP services, traffic and parking. It is crucial that these issues are assessed in detail with community input at the planning stage because if this infrastructure planning is “flawed” then once the development is completed the community, not the developers, is left with aftermath. It is completely unacceptable that OBU considers that WNP01 has made a “perfunctory assessment” of infrastructure issues. All the</p>

	<p>assessments have been based on the knowledge of professional consultants and the experience of people who actually live in the village. As an example of the latter, para#3.18 cites an IDP assessment in support of “expansion/reconfiguration to Morland House Surgery (1-2 additional consulting rooms)”. However, in discussion with the GPs the WNP Committee has discovered that there is neither provision for funding nor the location for additional parking that would be needed on the site where there are already parking overflow issues on a regular basis.</p>
<p>Response#15 Para#3 (Continued)</p>	<p>Para#3.20 refers to WNP01 policy# GBBA1. See Response#10Para#2 above.</p>
<p>Response#15 Para#4</p>	<p>Paras#4.2-4.5 mention several issues and seek to imply that WNP01 is endeavouring to restrict development in Wheatley. This is just not correct. However, it should be clear that with respect to the OBU site WNP01 does seek to preserve heritage and landscape assets that otherwise would be sacrificed by development that the community considers neither consistent with the existing built form of the site nor appropriate for the setting of the neighbourhood.</p>
<p>Reponse#15 Paras#4.9-10</p>	<p>This is an example of the authors blithely reciting “standards” policy with no regard for local conditions. Perhaps the authors of the Regulation 16 comments have only read selective parts of WNP01? Figures 4.1 and 5.2 and the associated text of WNP01 clearly indicate the main issues for local residents and for that reason policies P1 and T1 have been included to emphasise the need for OCC standards to be upheld and that it should apply to the proposed development at OBU and on the sites proposed in the village enhancement plan. There is absolutely no point in providing housing in a manner that exacerbates existing problems in the community. (See also Examiner’s comments re T1 above).</p>
<p>Reponse#15 Paras#4.11-14</p>	<p>See comments made above to SCI1 & 2 above. The legitimate concerns of the community are being disregarded on the grounds of the unforeseen consequences of an NDA designation.</p>
<p>Response#15 Para#5</p>	<p>Whereas the WNP Committee, in trying to develop an egalitarian plan, has sought to strike a balance between various conflicting pressures as summarised in para#10.6 of WNP01, the outline planning application and the tenor of the strident comments expressed by OBU under Regulations 14 and 16 demonstrate a complete disregard for STRAT14 of LP2034 and the views of the community previously expressed through the WNP Committee and at various stakeholder meetings.</p>