

# Wheatley Neighbourhood Plan Review - publicity period

## Response 1

### Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

### Contact Details

**Name** Sir/Madam

**Email** planning.policy@southandvale.gov.uk

Q1. Are you completing this form as an:

Organisation

### Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Paragraph 4.9 states the following: However, the lack of "green spaces" within the village does limit the recreational opportunities for the elderly. It is disappointing the plan does not address this lack.

It should be noted that the occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

SODC is currently preparing a strategies which may assist in the delivery of formal and possibly informal opportunities for physical activity for the residents of Wheatley of all ages.

The redevelopment of the OBU site will provide opportunities for bowling, and different forms of cricket for residents. The creation of the new pavilion may even create opportunities of short mat bowls and other activities.

### Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Wheatley Neighbourhood Plan Review:

No, I do not request a public examination

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	█
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Principal Planning Manager
<b>Organisation (if relevant)</b>	Sport England
<b>Organisation representing (if relevant)</b>	Sport England
<b>Address line 1</b>	Bisham Abbey
<b>Address line 2</b>	Marlow Road
<b>Address line 3</b>	Bisham
<b>Postal town</b>	Marlow
<b>Postcode</b>	SL7 1RR
██████████	██████████
██████████	██████████@sportengland.org

Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

████████████████████

Q9. How did you find out about the Wheatley Neighbourhood Plan Review consultation?

████████████████████

# Response 2

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Organisation

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Dear sirs

The Draft Detailed Site Assessments indicate WHE15 is closer and more conveniently located to Wheatley village than WHE2. The ATTACHED MAP indicates this is Untrue - the Site Assessments also don't clarify that WHE2 is far closer than WHE15 to any redevelopment at WHE25 (the OBU site ).

The WHE15 Draft significantly fails to point out that 100 metres of Roman Road - the main route into the village - has no footpath. Though the Draft acknowledges that most of WHE15 is unusable for Housing due to Pylons, it fails to indicate that - due to the flat land and curve of the pylons, almost the entire site is dominated by Pylons - unlike for instance WHE2.

The WHE2 Draft is simply in Error in failing to show that bus provision is Better for WHE2 than WHE15. WHE2 has easy access to the Thames/Oxford bus route via a currently freely-accessible 50-metre short-cut from Old London Road direct to London Road via Maidenhead Aquatics car park. And - unlike WHE15 - WHE2 is adjacent to 'Tyndale' bus stop on Old London Road, on the 400 and NU1 routes to Oxford via the centre of Wheatley.

It is omitted that WHE2 provides south-facing Views for any Housing - in contrast to the low-lieing WHE15 without Views.

The Draft Site Assessments appear 'tweaked' to enhance a pre-determined preference for Development at WHE15, to the detriment of the more convenient and integral WHE2.

Q3. You can upload supporting evidence here.

- File: wheatley map - WHE2-WHE15.jpg - [REDACTED]

Q4. If appropriate, you can set out what change(s) you consider necessary to make the plan able to proceed below. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

ATTACHED please find my series of specific Proposals to adjust the Draft Review to make it more accurate, specifically the Appendix 2 Detailed Site Assessments for WHE2 and WHE15, in the order items appear, and how paras 2.23, 2.27 and the Conclusion might be revised to take account of this.

Q5. You can upload supporting evidence here.

- File: WNP Draft - WHE2-WHE15.jpg [REDACTED]

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Wheatley Neighbourhood Plan Review:

Don't know

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

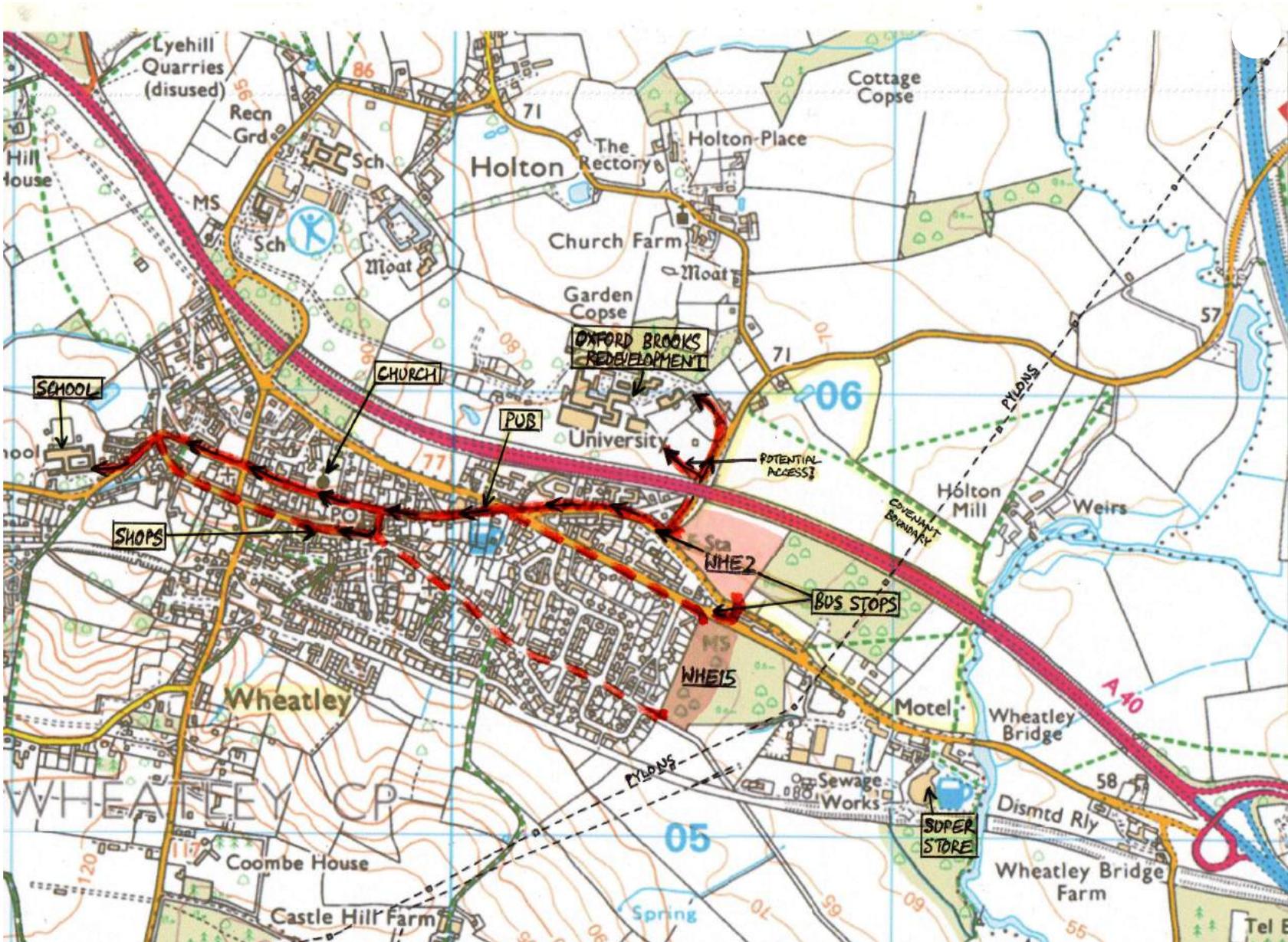
Title	Mr
Name	Matthew May
Job title (if relevant)	-
Organisation (if relevant)	-
Organisation representing (if relevant)	[REDACTED]
Address line 1	[REDACTED]
Address line 2	[REDACTED]
Address line 3	-
Postal town	[REDACTED]
[REDACTED]	[REDACTED]
Telephone number	[REDACTED]
Email address	[REDACTED]

Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

[REDACTED]

Q9. How did you find out about the Wheatley Neighbourhood Plan Review consultation?

[REDACTED]



## WHEATLEY NEIGHBOURHOOD PLAN DRAFT REVIEW - FINAL CONSULTATION

WHE2 /WHE15 COMPARISON - re: Appendix 2: Detailed Site Assessments - POSSIBLE INACCURACIES / OMISSIONS? - in the order items appear on pgs 15-18.  
(see also attached map)

### Size of Site

Hectare figures suggest **no necessity** for fewer houses on WHE2?

### Distance from centre of village

Mapping indicates **no** meaningful difference – most facilities **closer** to WHE2?  
(Additional traffic calming could reduce WHE2 road crossing issue)

### Characteristics which would help/hinder development

**Both** sites in practice on the Thame/Oxford '280' bus route,  
by utilising **50-metre short-cut** between Old London Road and 'The Avenue' bus stop.  
WHE2 currently has **better** service to Oxford ('400'+ 'NU1' from 'Tyndale', Old London Road).

Dominant curving route of tall Pylons over flat ground is within 200 metres of most of those parts of WHE15 not actually precluded from residential development (see **Title/Legal restrictions**).  
East of WHE2 has scope for Commercial use below Pylons, comparable to East of WHE15?

### Footpaths linking site to centre of village (pub)

Nearest village pub (Kings Arms) slightly **nearer** to WHE2.  
Footpath widening possible at cost to developer?  
WHE15 via Roman Road has **no footpath** for 110 metres.  
A 'Green Route' south of London Road not necessarily **dependent** on WHE15 Development?

### Time to walk to Shop/Play area/Bus stop/Pub/Church/School

Most facilities appear closer to WHE2? -  
except **Play area** (issue for developer?) - and **Shop?** (WHE15 2-minute timing appears in error?).  
WHE2 much closer to any new public or other facilities at **WHE25** (OBU redevelopment).

### Setting

WHE2 on rising ground not detrimental **but** giving it southern aspect Views.

## CONCLUSION

Appendix 2: Site Assessment (2.23, pg 28) states -

**'No further consideration will be given to (WHE2) for allocation in the WNP because better alternatives exist...'**

Should this statement not be more equivocal?

Perhaps some inaccuracies/omissions in the two Site Assessments need correction?

Insert some reference to **WHE2** in 2.27 (Future Site Assessment), and the **Conclusion?**

# Response 3

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email. Please see below:

Dear Planning Policy team

Thank you for your notification below regarding the Wheatley Neighbourhood Plan Review Consultation.

The Coal Authority is only a statutory consultee for coalfield Local Authorities. As South Oxfordshire District Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.

This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

Kind regards

[REDACTED]

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Planning & Development Manager
<b>Organisation (if relevant)</b>	The Coal Authority
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	200 Lichfield Lane
<b>Address line 2</b>	-
<b>Address line 3</b>	-
<b>Postal town</b>	Mansfield
<b>Postcode</b>	NG18 4RG
<b>Telephone number</b>	-
<b>Email address</b>	██████████@coal.gov.uk

# Response 4

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

## Your comments

<p>Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 2023-01-25 HE Response.pdf [REDACTED]</li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Business Officer (South East Region)
<b>Organisation (if relevant)</b>	Historic England
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	25 Dowgate Hill
<b>Address line 2</b>	-
<b>Address line 3</b>	-
<b>Postal town</b>	London
<b>Postcode</b>	EC4R 2YA
<b>Telephone number</b>	-
<b>Email address</b>	██████████@HistoricEngland.org.uk

Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

████████████████████



25/01/23 Our ref: PL00015940

Dear Sir/Madam,

**Ref: Wheatley Neighbourhood Plan Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on [REDACTED]@HistoricEngland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, if you have any queries.

Yours sincerely,

[REDACTED]  
Business Officer

E-mail: [REDACTED]@historicengland.org.uk

# Response 5

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

## Your comments

<p>Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 419639 - NE Response.pdf [REDACTED]</li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Sustainable Development Adviser
<b>Organisation (if relevant)</b>	Natural England
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	4th floor, Eastleigh House
<b>Address line 2</b>	Upper Market Street
<b>Address line 3</b>	-
<b>Postal town</b>	Eastleigh
<b>Postcode</b>	SO50 9YN
<b>Telephone number</b>	-
<b>Email address</b>	██████████@naturalengland.org.uk.

Date: 09 February 2023  
Our ref: 419639



South Oxfordshire District Council

**BY EMAIL ONLY**

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir / Madam

**Wheatley Neighbour Plan - Review**

Thank you for your consultation on the above dated 19 January 2023

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: [REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk).

Yours sincerely

[REDACTED]  
**Sustainable Advisor – Thames Solent Team  
Natural England**

# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

## Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> sets out supporting guidance.

**Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.**

---

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf)

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

# Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

---

<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) <sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

---

<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

# Response 6

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Agent

## Your comments

<p>Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 23-02W~1.PDF - [REDACTED]</li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Director
<b>Organisation (if relevant)</b>	Avison Young
<b>Organisation representing (if relevant)</b>	National Grid
<b>Address line 1</b>	Central Square South
<b>Address line 2</b>	Orchard Street
<b>Address line 3</b>	-
<b>Postal town</b>	Newcastle upon Tyne
<b>Postcode</b>	NE1 3AZ
<b>Telephone number</b>	-
<b>Email address</b>	██████████@avisonyoung.com

Our Ref: MV/ 15B901605



23 February 2023

South Oxfordshire District Council  
[█@wheatleyparishcouncil.gov.uk](mailto:█@wheatleyparishcouncil.gov.uk)  
**via email only**

Dear Sir / Madam

**Wheatley Neighbourhood Plan - Regulation 16 Consultation  
January – March 2023  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**Proposed development sites crossed or in close proximity to National Grid assets:**

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to National Grid infrastructure.



**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:  
[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:  
[redacted]@cadentgas.com

**Further Advice**

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

[redacted] Director

[redacted]@avisonyoung.com

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

[redacted] Town Planner

[redacted]@nationalgrid.com

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[redacted signature block]

**Director**

[redacted]@avisonyoung.com

**For and on behalf of Avison Young**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [REDACTED]@avisonyoung.com

# Response 7

## Respondent Details

[Redacted]

[Redacted]	[Redacted]

Q1. Are you completing this form as an:

Organisation

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email. Please see below and attachments.

[Redacted]

Thank you for your message below, and link to the NP web-site, regarding the above location / topic.

I can confirm that, at this present time, I have no further comments to make over and above those already made in my letters dated 16 October 2019.

In case you are unable to locate these in you archives, for your information and assistance, please find these attached, together with other referred to documents.

Regards,

[Redacted]

Q3. You can upload supporting evidence here.

- File: Chief Planning Office [Redacted].pdf [Redacted]
- File: DPM\_Combined.pdf [Redacted]
- File: WNP\_DOM\_Response Letter.pdf [Redacted]
- File: WNP\_OHLS\_Re [Redacted] tter.pdf [Redacted]
- File: WNP\_Sites.pdf [Redacted]

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Network Connections Planning Engineer
<b>Organisation (if relevant)</b>	Scottish and Southern Electricity Networks
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	1 Woodstock Road
<b>Address line 2</b>	Yarnton
<b>Address line 3</b>	-
<b>Postal town</b>	Kidlington
<b>Postcode</b>	OX5 1NY
<b>Telephone number</b>	-
<b>Email address</b>	██████████@sse.com

Draft Letter to Planning Authorities

**Consultation re-proposed major housing/commercial developments**

Planning permission has recently been granted for a number of housing or industrial / commercial developments on land crossed by overhead lines which are owned and operated by Southern Electric Power Distribution (SEPD). SEPD is concerned that insufficient discussion has taken place between SEPD and Planning Authorities concerning the future of these lines prior to the granting of planning permission.

These overhead lines generally afford supplies to other locations beyond the development, even whole towns or parts of cities in some instances and are carried on either steel towers or wood poles. These structures and the overhead conductors they support have been placed in accordance with planning permission in the form of a Section 37 (Electricity Act 1989) consent granted by the Secretary of State. This consent can only be granted following initial consultation with the Local Planning Authority.

For Planning Authorities to not properly consult and to impose conditions such as “the overhead lines are to be removed”, which developers would be unable to comply with themselves would effectively be *ultra vires*. We believe this issue has been previously highlighted in the letter from the Office of the Deputy Prime Minister to the Chief Planning Officers in England dated 25 November 2002. (copy enclosed)

As such, SEPD believes that in these circumstances, the Planning Authority should impose a condition prohibiting development until such time as the developer has reached agreement with the Distribution Network Operator (DNO) (a) as to how the development can be laid out such that the line(s) can be retained in their current position or (b) such that contractual arrangements have been agreed to modify the overhead lines.

It is for Planning Authorities to consider how best to achieve this when land is first being considered for development. For example it may be that Planning Authorities consider imposing conditions on developers requiring them to conclude arrangements for modifying the existing overhead lines before submission of their Planning Application or prior to any planning permission being granted.

I would be pleased to receive any comments you may have and discuss further, (if necessary by meeting with you) how to improve consultation on this important issue.

I look forward to hearing from you.

Yours faithfully

  
Network Operations and Planning Manager



OFFICE OF THE  
DEPUTY PRIME MINISTER

Chief Planning Officers in England

[REDACTED]  
Head of Development Control Policy  
Office of the Deputy Prime Minister  
4/H2 Eland House  
Bressenden Place  
London SW1E 5DU

[REDACTED]  
@odpm.gsi.gov.uk

Web site: [www.odpm.gov.uk](http://www.odpm.gov.uk)

Our Ref: PDC 31/2/1

25 November 2002

Dear Colleague

**CIRCULAR 11/95: USE OF NEGATIVE CONDITIONS**

I am writing to draw your attention to the advice in paragraph 40 and the footnote on page 16 of the Annex of Circular 11/95 on The Use of Conditions in Planning Permissions. The advice is on conditions worded in a negative form, prohibiting development until a specified action has been taken.

Following the High Court case *Merritt v SSETR and Mendip District Council* we need to amend the advice in Circular 11/95. Until we are able to amend the Circular, please would you note the following advice when imposing negative planning conditions.

The advice in Circular 11/95 on conditions depending on other's actions (Annex paragraphs 38 and 39), says that it is unreasonable to impose a condition worded in a positive form which developers would be unable to comply with themselves, or which they could comply with only with the consent or authorisation of a third party. Similarly, conditions which require the applicant to obtain an authorisation from another body should not be imposed.

Although it would be *ultra vires* to require works which the developer has no powers to carry out, or which would need the consent or authorisation of a third party, it may be possible to achieve a similar result by a condition worded in a negative form, prohibiting development until a specified action has been taken.

The way the advice is currently worded in paragraph 40 is that such a condition should only be imposed on a planning permission **if there are at least reasonable prospects** of the action in question being performed within the time-limit imposed by the permission.

As a result of the Judgement in *Merritt*, paragraph 40 should be amended to read, "It is the policy of the Secretary of State that such a condition may be imposed on a planning permission. However, when **there are no prospects at all** of the action in question being performed within the time-limit imposed by the permission, negative conditions should not be imposed. In other words, when the interested third party has said that they have no intention of carrying out the action or allowing it to be carried out, conditions prohibiting

development until this specified action has been taken by the third party should not be imposed."

The foot note at the bottom of page 16 should be replaced with: "A policy of refusing permission where there was no reasonable prospect of planning conditions being met could be lawful, but sound planning reasons for the refusal should be given and it should be made clear that this was only a starting point for consideration of cases."

Yours sincerely,

[REDACTED]

Your reference:

In Any Reply Please Quote: WNP\_Sites\_Dom

1 Woodstock Road

Yarnton

Kidlington

Oxfordshire

OX5 1NY

**SOUTH OXFORDSHIRE DISTRICT COUNCIL**

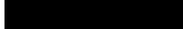
**135 MILTON PARK**

**ABINGDON**

**OXFORDSHIRE**

**OX14 4SB**

 Tel 01865 845888

 eMail @sse.com

For the attention of :- PLANNING POLICY -  


**16 October 2019**

Dear Planning Policy,

**Wheatley Neighbourhood Plan (WNP)**

I refer to your eMail message dated 6 September 2019 regarding the above topic.

At this stage, I can only provide general guidance on the provision of electricity infrastructure and the treatment of any existing infrastructure in relation to future development.

Connections for new developments from existing infrastructure can be provided subject to cost and time-scale.

Where existing infrastructure is inadequate to support the increased demands from the new development, the costs of any necessary upstream reinforcement required would normally be apportioned between developer and DNO (Distribution Network Operator) in accordance with the current Statement of Charging Methodology agreed with the industry regulator (OFGEM). Maximum time-scales in these instances would not normally exceed around 2 years and should not therefore impede delivery of any proposed housing development.

Where overhead lines cross development site, these will, with the exception of 400 kV tower lines, normally be owned and operated by Scottish & Southern Electricity Networks (SSEN).

In order to minimise costs, wherever possible, existing overhead lines can remain in place with uses such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not practicable, or where developers choose to lay out their proposals otherwise, then agreement will be needed as to how these will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits. The existing customer base should not be burdened by any costs arising from new development proposals.

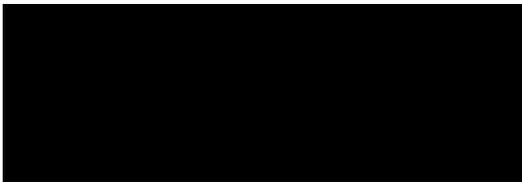
To ensure certainty of delivery of a development site, any anticipated relocation of existing overhead lines should be formally agreed with SSEN, prior to submission of a planning application.

## **Conclusion**

I trust the above is helpful to you at this current stage of your deliberations and can be included in the proposed WNP document, but you can contact me directly on the above telephone number should you require any further advice, particularly relating to specific sites.

However, for your information and assistance, please see the attached **Appendix A**, which includes additional information in respect of the areas detailed in the WNP document.

Yours faithfully,



Network Planning Engineer

## APPENDIX A

The identified areas are :-

Site	Location	Dwellings	Comments
WHE 15	Miss Tomb's Field	55	See Note 1
WHE 16	The Bungalows	10	See Note 1
WHE 17	Mobb's Land	0	See Note 1
WHE 22	Littleworth	25	See Note 1
WHE 25	Oxford Brookes University	300	See Note 1

- 1) It is anticipated **at today** that there may be sufficient capacity available to be able to supply this site from our **Wheatley** 33/11kV primary substation and the existing hv distribution network.

Your reference:

In Any Reply Please Quote: WNP\_OHL

1 Woodstock Road  
Yarnton  
Kidlington  
Oxfordshire  
OX5 1NY

**SOUTH OXFORDSHIRE DISTRICT COUNCIL**  
**135 MILTON PARK**  
**ABINGDON**  
**OXFORDSHIRE**  
**OX14 4SB**

Tel 01865 845888  
eMail [REDACTED]@sse.com

For the attention of :- PLANNING POLICY -

**16 October 2019**

Dear Planning Policy,

**Wheatley Neighbourhood Plan (WNP)**

I refer to your eMail message dated 6 September 2019 regarding the above topic.

The housing and development land areas detailed in the above document are typical of a number of recent sites across Southern England, where insufficient discussion has taken place between planning authorities and ourselves, prior to planning permission being granted. I attach a copy of a letter sent to all chief planning officers in our licence area in March 2012, which summarises the situation.

The land concerned is crossed by various 132,000 volt (132kV) overhead tower line (OTL) (solid black with purple squares), 33,000 volt (ehv) overhead lines (solid green) and 11,000 volt (hv) overhead lines (solid red), as detailed in the table below, which form an essential and integral part of Scottish & Southern Electricity Networks wider network and as such must be retained.

Please **note** that in the case of any 132 kV OTL, this is an extremely important link in our transmission system. Modifying a line such as this is a major undertaking, which should be avoided if possible. Consequently, our advice to developers carrying out feasibility studies on land crossed by such OTLs, is that these should be regarded as permanent physical features. The layout of any development should, therefore, be designed to allow the OTL to remain undisturbed, in the present position, if at all possible.

For your information and assistance, underground cables are indicated by a dashed line, with red for hv and green for ehv.

Site	Location	132kV	ehv	hv
WHE 15	Miss Tomb's Field	0	0	0
WHE 16	The Bungalows	0	0	0
WHE 17	Mobb's Land	0	2	0
WHE 22	Littleworth	0	0	0
WHE 25	Oxford Brookes University	0	0	0

Development beneath the overhead lines or diversion / undergrounding of the overhead lines may not be possible, in which case the development as planned would be unable to proceed.

No contractual arrangements have been agreed with any developer for modification of the above circuit/s. Therefore, any conditions imposed, should permission be granted, must be on the developer and not the Distribution Network Operator, as is the case for other existing infrastructure.

To ensure that the proposal is deliverable, you may consider it best to impose a requirement on the developer to agree contractual arrangements with Scottish & Southern Electricity Networks for any modifications prior to permission being granted.

We would consider the granting of planning permission without further discussion and agreement as to how our equipment can be accommodated within the proposal to be unacceptable.

For your information and assistance, I have attached a copy of our Mains Records showing the equipment affected for each of the above locations detailed in the above table.

Clearly, the above principles would apply to any development area, which is crossed by ehv and/or hv overhead lines.

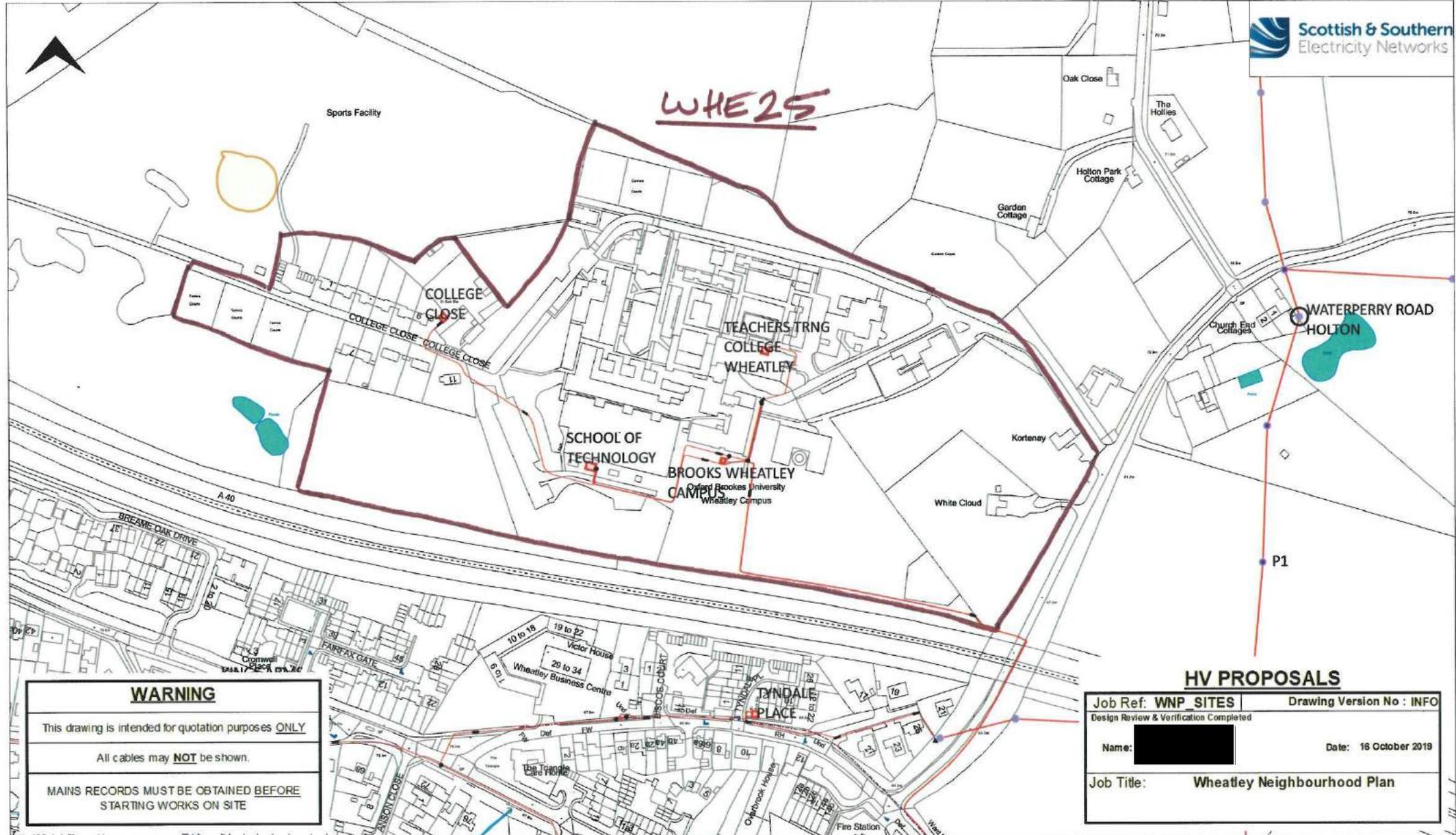
Yours faithfully,



Chris Gaskell  
Network Planning Engineer







**WARNING**

This drawing is intended for quotation purposes ONLY

All cables may **NOT** be shown.

**MAINS RECORDS MUST BE OBTAINED BEFORE STARTING WORKS ON SITE**

**HV PROPOSALS**

Job Ref: **WNP\_SITES** Drawing Version No: **INFO**

Design Review & Verification Completed

Name: [REDACTED] Date: 16 October 2019

Job Title: **Wheatley Neighbourhood Plan**

**WARNING**

There may have been subsequent alterations to the surface levels. Trail holes must be taken to determine positions and depths of cables. HS (G) 47 Booklet from the Health and Safety Executive - Avoiding Danger from Buried Cables - should be consulted before commencing excavation work. **WHEN WORKING IN THE VICINITY OF OVERHEAD LINES THE HEALTH AND SAFETY GUIDANCE NOTE GS6 SHOULD BE CONSULTED (AVAILABLE FROM THE HSE WEBSITE)**

Map Centre: 460368, 205944

Scale: 1:2500 Plot Date: 16/10/2019

UNCONTROLLED COPY  
Subject to revision  
Master held by SSEN Asset Data Team [REDACTED]@sse.com

	NORMAL DEPTH TO THE TOP OF THE CABLE WHEN LAID			
	Services	LV	HV	EHV
FOOTPATH/UNMADE	0.45m	0.45m	0.6m	0.8m
ROAD CROSSING	0.6m	0.6m	0.75m	0.9m
AGRICULTURAL	1m	1m	1m	1.1m

General Enquiries 0800 048 3516

Legend

<ul style="list-style-type: none"> <li>20 Wheatley HV 110kV Overhead Line</li> <li>21 Wheatley HV 110kV Overhead Line</li> <li>22 Wheatley HV 110kV Overhead Line</li> <li>23 Wheatley HV 110kV Overhead Line</li> <li>24 Wheatley HV 110kV Overhead Line</li> <li>25 Wheatley HV 110kV Overhead Line</li> <li>26 Wheatley HV 110kV Overhead Line</li> <li>27 Wheatley HV 110kV Overhead Line</li> <li>28 Wheatley HV 110kV Overhead Line</li> <li>29 Wheatley HV 110kV Overhead Line</li> <li>30 Wheatley HV 110kV Overhead Line</li> <li>31 Wheatley HV 110kV Overhead Line</li> <li>32 Wheatley HV 110kV Overhead Line</li> <li>33 Wheatley HV 110kV Overhead Line</li> <li>34 Wheatley HV 110kV Overhead Line</li> <li>35 Wheatley HV 110kV Overhead Line</li> <li>36 Wheatley HV 110kV Overhead Line</li> <li>37 Wheatley HV 110kV Overhead Line</li> <li>38 Wheatley HV 110kV Overhead Line</li> <li>39 Wheatley HV 110kV Overhead Line</li> <li>40 Wheatley HV 110kV Overhead Line</li> <li>41 Wheatley HV 110kV Overhead Line</li> <li>42 Wheatley HV 110kV Overhead Line</li> <li>43 Wheatley HV 110kV Overhead Line</li> <li>44 Wheatley HV 110kV Overhead Line</li> <li>45 Wheatley HV 110kV Overhead Line</li> <li>46 Wheatley HV 110kV Overhead Line</li> <li>47 Wheatley HV 110kV Overhead Line</li> <li>48 Wheatley HV 110kV Overhead Line</li> <li>49 Wheatley HV 110kV Overhead Line</li> <li>50 Wheatley HV 110kV Overhead Line</li> <li>51 Wheatley HV 110kV Overhead Line</li> <li>52 Wheatley HV 110kV Overhead Line</li> <li>53 Wheatley HV 110kV Overhead Line</li> <li>54 Wheatley HV 110kV Overhead Line</li> <li>55 Wheatley HV 110kV Overhead Line</li> <li>56 Wheatley HV 110kV Overhead Line</li> <li>57 Wheatley HV 110kV Overhead Line</li> <li>58 Wheatley HV 110kV Overhead Line</li> <li>59 Wheatley HV 110kV Overhead Line</li> <li>60 Wheatley HV 110kV Overhead Line</li> <li>61 Wheatley HV 110kV Overhead Line</li> <li>62 Wheatley HV 110kV Overhead Line</li> <li>63 Wheatley HV 110kV Overhead Line</li> <li>64 Wheatley HV 110kV Overhead Line</li> <li>65 Wheatley HV 110kV Overhead Line</li> <li>66 Wheatley HV 110kV Overhead Line</li> <li>67 Wheatley HV 110kV Overhead Line</li> <li>68 Wheatley HV 110kV Overhead Line</li> <li>69 Wheatley HV 110kV Overhead Line</li> <li>70 Wheatley HV 110kV Overhead Line</li> <li>71 Wheatley HV 110kV Overhead Line</li> <li>72 Wheatley HV 110kV Overhead Line</li> <li>73 Wheatley HV 110kV Overhead Line</li> <li>74 Wheatley HV 110kV Overhead Line</li> <li>75 Wheatley HV 110kV Overhead Line</li> <li>76 Wheatley HV 110kV Overhead Line</li> <li>77 Wheatley HV 110kV Overhead Line</li> <li>78 Wheatley HV 110kV Overhead Line</li> <li>79 Wheatley HV 110kV Overhead Line</li> <li>80 Wheatley HV 110kV Overhead Line</li> <li>81 Wheatley HV 110kV Overhead Line</li> <li>82 Wheatley HV 110kV Overhead Line</li> <li>83 Wheatley HV 110kV Overhead Line</li> <li>84 Wheatley HV 110kV Overhead Line</li> <li>85 Wheatley HV 110kV Overhead Line</li> <li>86 Wheatley HV 110kV Overhead Line</li> <li>87 Wheatley HV 110kV Overhead Line</li> <li>88 Wheatley HV 110kV Overhead Line</li> <li>89 Wheatley HV 110kV Overhead Line</li> <li>90 Wheatley HV 110kV Overhead Line</li> <li>91 Wheatley HV 110kV Overhead Line</li> <li>92 Wheatley HV 110kV Overhead Line</li> <li>93 Wheatley HV 110kV Overhead Line</li> <li>94 Wheatley HV 110kV Overhead Line</li> <li>95 Wheatley HV 110kV Overhead Line</li> <li>96 Wheatley HV 110kV Overhead Line</li> <li>97 Wheatley HV 110kV Overhead Line</li> <li>98 Wheatley HV 110kV Overhead Line</li> <li>99 Wheatley HV 110kV Overhead Line</li> <li>100 Wheatley HV 110kV Overhead Line</li> </ul>	<ul style="list-style-type: none"> <li>101 Wheatley HV 110kV Overhead Line</li> <li>102 Wheatley HV 110kV Overhead Line</li> <li>103 Wheatley HV 110kV Overhead Line</li> <li>104 Wheatley HV 110kV Overhead Line</li> <li>105 Wheatley HV 110kV Overhead Line</li> <li>106 Wheatley HV 110kV Overhead Line</li> <li>107 Wheatley HV 110kV Overhead Line</li> <li>108 Wheatley HV 110kV Overhead Line</li> <li>109 Wheatley HV 110kV Overhead Line</li> <li>110 Wheatley HV 110kV Overhead Line</li> <li>111 Wheatley HV 110kV Overhead Line</li> <li>112 Wheatley HV 110kV Overhead Line</li> <li>113 Wheatley HV 110kV Overhead Line</li> <li>114 Wheatley HV 110kV Overhead Line</li> <li>115 Wheatley HV 110kV Overhead Line</li> <li>116 Wheatley HV 110kV Overhead Line</li> <li>117 Wheatley HV 110kV Overhead Line</li> <li>118 Wheatley HV 110kV Overhead Line</li> <li>119 Wheatley HV 110kV Overhead Line</li> <li>120 Wheatley HV 110kV Overhead Line</li> <li>121 Wheatley HV 110kV Overhead Line</li> <li>122 Wheatley HV 110kV Overhead Line</li> <li>123 Wheatley HV 110kV Overhead Line</li> <li>124 Wheatley HV 110kV Overhead Line</li> <li>125 Wheatley HV 110kV Overhead Line</li> <li>126 Wheatley HV 110kV Overhead Line</li> <li>127 Wheatley HV 110kV Overhead Line</li> <li>128 Wheatley HV 110kV Overhead Line</li> <li>129 Wheatley HV 110kV Overhead Line</li> <li>130 Wheatley HV 110kV Overhead Line</li> <li>131 Wheatley HV 110kV Overhead Line</li> <li>132 Wheatley HV 110kV Overhead Line</li> <li>133 Wheatley HV 110kV Overhead Line</li> <li>134 Wheatley HV 110kV Overhead Line</li> <li>135 Wheatley HV 110kV Overhead Line</li> <li>136 Wheatley HV 110kV Overhead Line</li> <li>137 Wheatley HV 110kV Overhead Line</li> <li>138 Wheatley HV 110kV Overhead Line</li> <li>139 Wheatley HV 110kV Overhead Line</li> <li>140 Wheatley HV 110kV Overhead Line</li> <li>141 Wheatley HV 110kV Overhead Line</li> <li>142 Wheatley HV 110kV Overhead Line</li> <li>143 Wheatley HV 110kV Overhead Line</li> <li>144 Wheatley HV 110kV Overhead Line</li> <li>145 Wheatley HV 110kV Overhead Line</li> <li>146 Wheatley HV 110kV Overhead Line</li> <li>147 Wheatley HV 110kV Overhead Line</li> <li>148 Wheatley HV 110kV Overhead Line</li> <li>149 Wheatley HV 110kV Overhead Line</li> <li>150 Wheatley HV 110kV Overhead Line</li> </ul>
---	--

# Response 8

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Individual

## Your comments

<p>Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>• File: Scan_20230227.pdf - [REDACTED]</li><li>• File: Scan_20230227 (2).pdf - [REDACTED]</li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	Ella May
<b>Job title (if relevant)</b>	-
<b>Organisation (if relevant)</b>	██████████
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	-
<b>Address line 2</b>	-
<b>Address line 3</b>	-
<b>Postal town</b>	-
<b>Postcode</b>	-
<b>Telephone number</b>	-
<b>Email address</b>	████████████████████

# Have your say

## Wheatley Neighbourhood Plan Review Consultation

The consultation runs from  
19 January to 2 March 2023

---

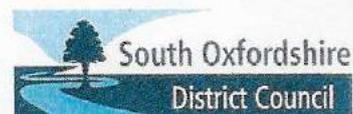
Find out more at  
[southoxon.gov.uk/Wheatley-NP](https://southoxon.gov.uk/Wheatley-NP)

Scan the QR code on the right to go straight to  
the online comment form

View the hard copy documents at the Parish  
Office (please check opening times before  
travelling)

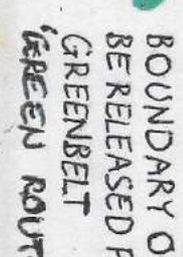
Please help spread the word to others who  
may wish to take part

For any queries, please call 01235 422600 or  
email [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk) and  
we will be happy to help.



Listening Learning Leading



 BOUNDARY OF LAND TO BE RELEASED FROM THE GREENBELT  
 'GREEN ROUTE'

Drawing key

# Response 9

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

## Your comments

<p>Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: 230302~1.PDF [REDACTED]</li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Property Town Planner
<b>Organisation (if relevant)</b>	Thames Water
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	1st Floor West
<b>Address line 2</b>	Clearwater Court
<b>Address line 3</b>	Vastern Road
<b>Postal town</b>	Reading
<b>Postcode</b>	RG1 8DB
<b>Telephone number</b>	-
<b>Email address</b>	██████████@thameswater.co.uk



E: [REDACTED]@thamewater.co.uk  
M: +44 (0) 7747 647031

South and Vale Councils  
Issued via email:  
planning.policy@southandvale.gov.uk

1<sup>st</sup> Floor West  
Clearwater Court  
Vastern Road  
Reading  
RG1 8DB

02 March 2023

## South Oxfordshire – Wheatley Neighbourhood Plan Review

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the South and Vale area and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

### **Para 4.36 Water Supply and Sewerage**

We support the text at paragraph 4.36 in principle, but consider it could be improved and a policy introduced.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 11 states: “*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 28 relates to non-strategic policies and states: “*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for*

*specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we agree that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

**Water Efficiency/Sustainable Design**

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:  
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

## **Comments in Relation to Flood Risk and Sustainable Drainage Systems**

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan "***It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.***"

### **Site Allocations**

There are no new site allocations for us to comment upon. The level of information contained in the draft Neighbourhood Plan does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

In relation to the Outline Planning application for 500 homes at Wheatley which is Pending, we have raised capacity constraints, we've raised both foul water and clean water concerns.

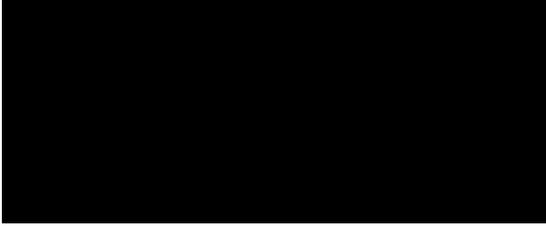
We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Yours faithfully,



Thames Water Property Town Planner

# Response 10

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:
Organisation

## Your comments

<p>Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.</p>
<p>Response received via email. Please see attachment.</p>

Q3. You can upload supporting evidence here.
<ul style="list-style-type: none"><li>File: OCCRES~1.PDF - [REDACTED]</li></ul>

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Principle Planner
<b>Organisation (if relevant)</b>	Oxfordshire County Council
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	County Hall
<b>Address line 2</b>	New Road
<b>Address line 3</b>	-
<b>Postal town</b>	Oxford
<b>Postcode</b>	OX1 1ND
<b>Telephone number</b>	-
<b>Email address</b>	██████████@Oxfordshire.gov.uk

**OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING  
CONSULTATION:**

**District:** South Oxfordshire

**Consultation:** Wheatley Neighbourhood Plan 2019 – 2035 Review

---

**Overall View of Oxfordshire County Council**

As noted in the Statement of Significance, this review has been held as South Oxfordshire District Council adopted the Local Plan 2035 in December 2020. The review of the Wheatley Neighbourhood Plan 2019-2034 has been carried out to bring it inline with this Local Plan.

The County Council have no specific comments to make on this consultation, other than noting that any potential photovoltaic project on Wheatley Schools should be discussed with our Property team at the appropriate point.

**Officer's Name:** [REDACTED]

**Officer's Title:** Principal Planner

**Date:** 02 March 2023

---

# Response 11

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email. Please see below and attachment.

Dear Sirs,

Avison Young is instructed by Oxford Brookes University in respect of town planning matters at its campus in Wheatley.

Attached for your attention is a set of representations in respect of the Wheatley Neighbourhood Plan Review.

I would be grateful if you could acknowledge receipt of the document. I would also be grateful if you could inform the University, via ourselves, on future stages of the Neighbourhood Plan Review process.

Regards,

[REDACTED]

Q3. You can upload supporting evidence here.

- File: OBUREP~1.PDF [REDACTED]

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Director, Planning, Development and Regeneration
<b>Organisation (if relevant)</b>	Avison Young
<b>Organisation representing (if relevant)</b>	Oxford Brookes University
<b>Address line 1</b>	3 Brindleyplace
<b>Address line 2</b>	-
<b>Address line 3</b>	-
<b>Postal town</b>	Birmingham
<b>Postcode</b>	B1 2JB
<b>Telephone number</b>	-
<b>Email address</b>	██████████@avisonyoung.com

Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

██████████

**AVISON  
YOUNG**

# Oxford Brookes University

Response to Proposed Amendments to Wheatley Neighbourhood Plan and  
Associated Design Guidance and Codes

2 March 2023

# Contents

1.	Introduction .....	1
2.	Background and Context .....	2
3.	Existing Planning Policy and Guidance Framework .....	4
4.	Extant Planning Permission .....	6
5.	Proposed Changes to Wheatley Neighbourhood Plan and Design Guidance .....	8
6.	Commentary on Proposed Design Guidance and Codes .....	9
7.	Conclusions .....	10
8.	Changes Required .....	12

**Report title:** Objections to Proposed Amendments to Wheatley Neighbourhood Plan and Associated Design Guidance

**Prepared by:** [REDACTED]

**Status:** Draft

**Draft date:** 1 March 2023

**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 Avison Young (AY) is instructed by Oxford Brookes University (OBU) to provide town planning and property advice in respect of its campus at Wheatley. The University has an ongoing Estates Strategy Programme, with the objective of consolidating its operations onto a single Campus at Headington.
- 1.2 The University has identified that the Wheatley Campus will become surplus to its requirements and has taken town planning and property advice in respect of the future use of the site. This process has been ongoing since 2016. Significant progress has been made.
- 1.3 The Wheatley Campus site was removed from the Oxford Green Belt and allocated for the construction of approximately 500 dwellings as part of the adoption of the South Oxfordshire Local Plan, 2035. The Campus also benefits from an extant planning permission which authorises the construction of up to 500 dwellings.
- 1.4 The Wheatley Neighbourhood Plan was first made in 2021. AY engaged extensively in the preparation process on OBU's behalf. Significant alterations were made to the Neighbourhood Plan as result of the University's constructive engagement in the process.
- 1.5 The Wheatley Neighbourhood Plan Group (WNPG) and Wheatley Parish Council (WPC) is now undertaking a review of the WNP. The review includes proposals to adopt "*Design Guidance and Codes*" which will form part of the Neighbourhood Plan.
- 1.6 The Neighbourhood Plan is part of the Development Plan, which is the starting point for the determination of applications for planning permission and the approval of reserved matters in respect of the redevelopment of the Campus.
- 1.7 The University has not been notified of either the WNP review process or the proposed Design Guidance and Codes. This is despite the University's extensive engagement in the previous WNP preparation process and its ownership of the largest development site in Wheatley.
- 1.8 In these representations we explain our concerns in respect of the emerging WNP and the proposed Design Guidance and Codes.
- 1.9 In Section 2, we explain the background and context of the campus site, including a summary of the latest position in respect of its development.
- 1.10 In Section 3 we identify the existing and extant planning policy, guidance and permission which establishes detailed, bespoke, design criteria for the redevelopment of the campus.
- 1.11 In Section 4 we explain the extant planning permission for the redevelopment of the campus and the design criteria that are established by it.
- 1.12 In Section 5 we identify the changes proposed by the WNP review and in particular the proposed introduction of detailed Design Guidance and Codes.
- 1.13 In Section 6 we provide commentary on the Design Guidance and Codes and explain why they conflict with the design framework for the site which is already established by existing planning policy, guidance and an extant planning permission.
- 1.14 In Section 7 we provide our conclusions on the proposed changes to the WNP, including why the proposed modifications fail to satisfy the "basic conditions" and would conflict with strategic policies in the adopted Local Plan.
- 1.15 In section 8 we identify the actions that must be taken to ensure that the basic conditions are met.

## 2. Background and Context

- 2.1 The Wheatley Campus site covers an area of approximately 21 hectares and is located immediately to the north of the A40. The site is located entirely within the parish of Holton and is separated from Wheatley by the A40. Vehicular access to the site is from the east, via Waterperry Road.
- 2.2 In January 2018, AY submitted an outline planning application to South Oxfordshire District Council for the redevelopment of the campus for housing. The planning application was given the reference P17/S4254/O. An Environmental Impact Assessment was submitted in support of the application. The scheme was amended during the determination period to reflect discussions that took place with the Council's Officers and several of its statutory consultees.
- 2.3 The planning application was reported to the District Council's Planning Committee on 28 November 2018 with a recommendation for approval. Members resolved to refuse planning permission, contrary to the recommendation of their Officers, on three substantive grounds:-
- Harm to the openness of the Green Belt;
  - Harm to the significance of heritage assets; and
  - Inadequacy of pedestrian and cycle accessibility.
- 2.4 An appeal was subsequently lodged by the University and was recovered by the then Secretary of State for Housing, Communities and Local Government on 12 July 2019. The Appeal Inquiry took place between 22<sup>nd</sup> and 31<sup>st</sup> October 2019.
- 2.5 The Secretary of State's decision and the Inspector's report were issued simultaneously on 23 April 2020. The Secretary of State agreed with the recommendations of the Planning Inspector. The appeal was allowed and outline planning permission was granted, subject to conditions and a package of financial contributions and other obligations set out in legal agreement. Further detail on the outline planning permission is included in Section 4.
- 2.6 The planning application and appeal process was carried out in parallel to the promotion of the site, for residential development, through the then emerging South Oxfordshire Local Plan 2011 - 2035. The University proposed that the site should be removed from the Oxfordshire Green Belt and allocated for 500 dwellings.
- 2.7 The South Oxfordshire Local Plan 2011-2035 was eventually adopted on 10 December 2020. The site was removed from the Green Belt as part of the adoption of the plan. The site was allocated for "*approximately 500 dwellings*" under Policy "*STRAT 14*". Further detail on Policy STRAT 14 is included in Section 3.
- 2.8 The outline planning permission for the redevelopment of the campus remains extant. The University is in the process of preparing applications for the approval of details of matters reserved from the outline permission (the Reserved Matters). The Reserved Matters application will be made within the next few weeks.
- 2.9 The University has submitted a second outline planning application, again for the redevelopment of the site for approximately 500 dwellings. The application was registered as valid by the District Council on 7<sup>th</sup> November 2022 and was given the planning reference number P22/S3975/O. The second application is substantially similar to the first and complies fully with Policy STRAT 14 of the adopted Local Plan.
- 2.10 The current situation in respect of the Campus site is summarised as follows:-
- All of the Campus site is outside the Oxford Green Belt;
  - The site is allocated for approximately 500 dwellings in an up to date development plan;
  - Planning permission for the redevelopment of the site for 500 dwellings has been granted and remains extant;

- The site is a significant constituent part of the District Council's supply of housing land, which it is required to maintain under the provisions of the National Planning Policy Framework (NPPF);
- Applications for the approval of details of reserved matters are being prepared and will be submitted to the District Council shortly; and
- A second application, also for the development of the site for 500 dwellings, has been submitted to the Council and is expected to be determined, positively, in the next few months.

2.11 The proposed changes to the Wheatley Neighbourhood Plan, and whether these comply with the "basic conditions" must be considered in the context of the above planning situation.

### 3. Existing Planning Policy and Guidance Framework

3.1 The adopted “Development Plan” against which proposals for the redevelopment of the campus site must be assessed, comprises:-

- The South Oxfordshire Local Plan – 2011-2035; and
- The Wheatley Neighbourhood Plan, 2021.

3.2 In addition the proposals are subject to various design guidance documents including:-

- The National Model Design Code, prepared by the Department for Levelling Up, Housing and Communities;
- Building for a Healthy Life, published by Homes England;
- The “Joint Design Guide” prepared by South Oxfordshire and Vale of the White Horse District Councils.

3.3 The above are considered in turn.

#### The South Oxfordshire Local Plan 2011-2035

3.4 The South Oxfordshire Local Plan was adopted in December 2020 and covers the period until 2035. The plan contains numerous general policies in respect of the overall strategy for housing and other development in South Oxfordshire.

3.5 Policy STRAT 1 sets out the overall strategy for the district and confirms that strategic allocations will be made at various locations, including at the Wheatley campus.

3.6 Policy STRAT 4 establishes a set of general criteria which proposals for strategic development must comply with. Part 3 of the policy states:-

*“Proposals must be accompanied by a comprehensive masterplan for the entire strategic allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner”.*

3.7 Part 6 of the policy establishes other design criteria, including that each development will be expected to provide:-

*“A scheme of an appropriate layout and form which respects the surrounding character and setting”.*

3.8 Policy STRAT 14 considers the Wheatley campus specifically and establishes a comprehensive list of requirements for the development of the site. Some of the more relevant provisions of the policy are summarised as follows;

- the site is to deliver approximately 500 dwellings within the plan period;
- high density development should be located in the eastern and central parts of the site with lower density development in the south-west part;
- proposals must be accompanied by a masterplan with the objective of achieving numerous design criteria; and
- the site is removed from the Green Belt.

3.9 We conclude that the site specific policy, and general strategic policies in the adopted Local Plan establish a robust framework against which proposals for development must be assessed.

## The Wheatley Neighbourhood Plan

- 3.10 The Wheatley Neighbourhood Plan was made (adopted) on 20 May 2021. It was made after both the adoption of the South Oxfordshire Local Plan and the grant of planning permission for the redevelopment of the Wheatley campus. The University engaged extensively in the preparation of the neighbourhood plan. Numerous changes to the plan were made in response to the University's suggestions.
- 3.11 The Wheatley Neighbourhood Plan area covers all of the parish of Wheatley. It also includes part of the Campus site, all of which is in the parish of Holton. The University has consistently maintained that it is inappropriate to include part of an allocated site within a Neighbourhood Plan area with the remainder of the site outside.
- 3.12 The Wheatley Neighbourhood Plan includes Policy SBOBU-WHE25 which relates specifically to the part of the Campus that lies within the Neighbourhood Plan area. The policy does not relate to the rest of the site which is covered by the Local Plan allocation and has been removed from the Green Belt. The policy includes six broad criteria for redevelopment which include matters such as;
- the preparation of a masterplan;
  - the design of the scheme taking into account openness of the Green Belt beyond the boundaries of the site;
  - affordable housing;
  - noise;
  - public realm/ open space; and
  - the provision of pedestrian and cycle access.
- 3.13 All of the above reiterate the provisions of the adopted Local Plan in respect of the campus and do not establish any additional requirements for the redevelopment of the site.

## Other Material Considerations

- 3.14 There are various other design guides and policies which must be taken into consideration in the determination of planning applications to redevelop the campus site. However, none of these seek to place particular density or height restrictions on proposals and instead defer those matters to development plan policy and local design guidance. Accordingly, this other guidance is not considered in any further detail.

## 4. Extant Planning Permission

- 4.1 The extant planning permission for the redevelopment of the site was granted, by the Secretary of State in a letter dated 23 April 2020. The permission is defined by:-
- The description of development.
  - The conditions attached to the permission.
  - The parameter plans approved as part of the grant of permission.
- 4.2 In addition, the legal agreement that accompanies the permission places obligations on the applicant and various other parties.
- 4.3 The description of development authorises a comprehensive range of engineering and other works in association with the grant of planning permission for 500 houses. The Inspector's report explores the merits of these matters in some detail and concludes that all are satisfactorily addressed in the information submitted in support of the application. In summary, the way in which the site is to be developed has been carefully considered and found to be satisfactory by both a Planning Inspector and the Secretary of State.
- 4.4 The permission is subject to a total of 19 conditions. The suite of conditions requires the submission of details of the following design related matters;
- the layout of the development proposed, including details of all roads, development plots, gardens etc;
  - the scale of development proposed, including the number of dwellings and their dimensions;
  - the appearance of every aspect of the development proposed, including details of all the houses, apartments and other buildings proposed;
  - the landscaping of the development proposed, including structural landscaping across the wider site and planting within gardens and public areas;
  - the number and mix (bedroom number) of market and affordable dwellings;
  - the location and boundaries of public open space, play areas, green infrastructure, leisure and sports pitches/ pavilion, associated parking areas and a scheme for their future management;
  - details of all infrastructure including means of vehicular, pedestrian and cycle links to serve each of the phases of development;
  - drainage and landscaping works, including future management;
  - existing and proposed ground levels and the ridge/ roof heights of all of the buildings proposed;
  - details of the phasing of the development;
  - details of how biodiversity net gain will be delivered on site;
  - details of how all retained trees will be protected and enhanced on site;
  - details of electric vehicle charging points; and
  - details of a mitigation strategy and a programme for enhancement and maintenance of the Scheduled Monument.
- 4.5 We conclude that the conditions attached to the permission establish a very comprehensive framework which will provide the District Council with more than adequate control over the design of the scheme.

- 4.6 The permission is also defined by three parameter plans as follows:-
- Parameter Plans 1: Land Use (drawing number: 7590-L-18 Revision G);
  - Parameters Plan 2: Green Infrastructure (drawing number: 7590-L19 Revision F);
  - Parameter Plans 3: Building Heights (drawing number: 7590-L-20 Revision F).
- 4.7 The above are considered in turn.
- 4.8 The **Land Use Parameter Plan** divides the site into three different areas:-
- Residential development – 10.78 hectares, to include all residential development and associated infrastructure including roads and drives, hardstanding, incidental open space, footpaths, sports pitches and SUDs;
  - Green infrastructure including SUDs – 10.69 hectares; and
  - A dual use area in which green infrastructure and/ or the community sports building and associated infrastructure (including SUDs) can be located.
- 4.9 The parameter plan establishes that approximately half of the site will accommodate residential development (10.78 hectares) and the other half will be used for green infrastructure. The reserved matters applications must propose all of the 500 units within the “residential development area” i.e. on a maximum of 10.78 hectares.
- 4.10 The **Green Infrastructure** parameter plan provides more detail on the use of the green infrastructure land. This includes its use for;
- planning pitches / public open space/ play areas;
  - structural landscaping, comprising existing trees to be retained in new planting;
  - structural landscaping including the provision of a new parkland setting, and
  - areas set aside for ecology.
- 4.11 Again, no residential development can be carried out within any of these green infrastructure areas.
- 4.12 Finally, the **Building Heights** parameter plan relates only to the parts of the site identified for residential development. The plan establishes that approximately one third of the site can be developed with buildings of up to four storeys in height. Another third can be developed with buildings up to three storeys in height and the remaining third can be developed with buildings of up to two storeys in height.
- 4.13 The building heights established by the parameter plans are the result of careful landscape and visual assessment work carried out in support of the planning application. The approved building heights reflect the need to build at heights which are higher than much of the existing development in Wheatley in order to deliver 500 dwellings whilst retaining approximately half of the site as green infrastructure.
- 4.14 In summary, we conclude that the planning permission establishes a very detailed design framework which the reserved matters must comply with in order to be approved. There is no need for further design or other guidance in respect of the site.

## 5. Proposed Changes to Wheatley Neighbourhood Plan and Introduction of Design Guidance and Codes

- 5.1 Wheatley Parish Council has submitted a “Review” version of its Neighbourhood Plan to South Oxfordshire District Council. If the revised plan is “made” in its current form, it will become part of the Development Plan for the determination of applications for planning permission and the approval of reserved matters in respect of part of the University’s Wheatley campus. Neither the University nor its consultants have been notified of the proposed changes to the neighbourhood plan or consulted on the emerging provisions.
- 5.2 A “side by side” comparison of the “made” and “review” versions of the Neighbourhood Plan demonstrate that much of the review version is the same as the made version.
- 5.3 The policy which refers specifically to the Campus (SPOBU – WHE25) remains largely unchanged and reflects the amendments requested by the University in the last round of neighbourhood plan making. However, bullet point two of the Policy, which states that the *“layout, design and height of the new buildings take account of the openness of the Green Belt and as identified generally in national planning policy (NPPF 149g),”* has not been amended to reflect the fact that the Campus site was removed from the Green Belt, following the adoption of the SODC Local Plan in December 2020. This part of Policy SPOBU – WHE25 should, therefore, be deleted.
- 5.4 Nevertheless, Policy H1 of the review version of the Neighbourhood Plan is substantially different to the made version. In summary, the policy states that development proposals will be supported where they reflect the “Wheatley Design Guidance and Codes”. The Design Guidance and Codes are found at Appendix 8 of the review version of the Neighbourhood Plan. The Design Guidance and Codes would apply to redevelopment proposals for the campus and therefore require further consideration.

## 6. Commentary on Proposed Design Guidance and Codes

- 6.1 The Design Guidance and Codes have been prepared, on behalf of the Parish Council, by a urban design consultancy. The Campus site is referred to specifically within the document. The character of the site is described in the “Character Assessment” part of the document under “CA9 – Oxford Brookes University”. The section describes the land use, pattern of development, building line and other site characteristics.
- 6.2 The character assessment results in the establishment of five different character areas for Wheatley. The campus site falls within the “Settlement Edge” character area. This is despite the separation between the village and the site created by the A40.
- 6.3 The Design Guidance and Codes establish a total of 21 separate pieces of guidance which apply to the “Settlement Edge” area, which includes the Campus. We do not explore all of these codes in detail, but instead focus on some which directly conflict with the extant planning permission for the site and its allocation in the adopted Local Plan. This is as follows.

### ***SL01 – Village Edge***

- 6.4 The guidance assumes that “village edge” sites adjoin existing built development. The guidance expects proposals to respond to this. This is not the case for the campus. The campus site is a completely “blank canvas” which requires a new, innovative, approach, as established by the extant permission.

### ***VV02***

- 6.5 The guidance requires schemes to demonstrate how they integrate with or improve the existing streetscape. This is not possible on the campus site because there is no existing residential streetscape.

### ***VV03 – House and Building Type***

- 6.6 The guidance establishes that new development should have a “story” and a connection to the place. Meeting local housing need is referred to as a potential way of demonstrating this. This goes far beyond the scope of design guidance and is in direct conflict with previously agreed principles. The campus site is not physically connected with existing development in Wheatley and is separated by infrastructure (A40) and open space (the adjacent school).

### ***Code 1 – Plot Principles - 1A Spatial Definition and Public Realm***

- 6.7 The guidance states that the spacing of new development should reflect the rural character of the area and should allow for long views of the countryside from the public realm. This is incompatible with the densities authorised on the Wheatley campus. Furthermore, the campus is a blank canvas and its development will reflect modern urban design principles as opposed to an attempt to recreate Wheatley in a different context.

### ***Code 2 – Streetscape Principles – 2A Building Heights and Roof Lines***

- 6.8 The guidance states that development building heights should accord with the prevailing settlement character of two storey dwellings. The guidance only contemplates one or three storey building heights where they are in-keeping with the local character and there is precedent in the surrounding area.
- 6.9 The extant permission for the redevelopment of the campus relies on four storey development across approximately one third of the site in order to achieve the 500 dwellings and retaining the approved green infrastructure. Compliance with the Design Guidance and Codes would reduce the number of dwellings delivered on the site, in direct conflict with adopted development plan policy.
- 6.10 The guidance goes on to state that flat roofs for buildings, extensions, garages etc should be avoided. This effectively precludes modern apartment designs, many of which use flat or shallow pitched roofs. Again, this is in direct conflict with development plan policy and an extant permission, neither of which restrict flat or shallow pitches roofs.

### **3B – Parking Solutions**

- 6.11 The parking solutions proposed in the guidance all refer to parking alongside detached or semi-detached dwellings. None of the guidance contemplates apartment style development. Compliance with the parking designs proposed would significantly reduce the developable area of the site, leading to a reduction in the number of dwellings delivered. This would be in direct conflict with development plan policy and an extant permission.

### **5B – Building Vernacular**

- 6.12 The guidance lists a range of traditional building materials as suitable for use in Wheatley. These include natural stone, red brick, slate and other traditional building materials. These restrictions precludes the use of innovative building materials commonly found in modern apartment development.

### **Summary**

- 6.13 In summary, the Design Guidance and Codes appear to have been prepared with relatively small development schemes on the southern side of the A40 in mind. Development in these areas would be adjacent to existing development, hence a degree of “fitting in” is justified. All of the example drawings included in the document show detached or semi-detached, two storey, development set in large gardens.
- 6.14 The guidance makes no reference to, or acknowledgement of, the need for relatively high density, four storey, development on the campus site.

## **7. Conclusions**

- 7.1 We conclude that, if adopted in its current form, the Wheatley Neighbourhood Plan Review would establish a very detailed set of design parameters against which proposals for planning permission or reserved matters on the campus site would be judged.
- 7.2 The Design Guidance and Codes do not contemplate the type of development for which planning permission has been granted on the campus site, i.e. relatively high density, four storey development that is required to deliver 500 homes on the site.
- 7.3 This sets up a conflict with both the extant permission and strategic policy STRAT 14 of the Local Plan.
- 7.4 The Neighbourhood Plan Review is accompanied by a “Basic Conditions Statement” which examines and concludes on whether the basic conditions have been complied with in respect of the emerging document.
- 7.5 In particular, the statement considers whether the Neighbourhood Plan review is broadly in accordance with strategic policies in the adopted South Oxfordshire Local Plan. The statement considers these policies, including STRAT 14, in the context of the new neighbourhood plan policies and confirms compliance. However, it does not consider the Design Guidance and Design codes and the implications of these for the delivery of housing in accordance with Policy STRAT14.

- 7.6 Much of the Design Guidance and Codes conflict directly with the provisions of Policy STRAT 14 of the adopted Local Plan. If the Guidance and Codes are applied to the Campus site the result would be delivery of significantly fewer than the 500 homes identified by the policy and authorised by the extant permission. This places the Design Guidance and Codes in direct conflict with a strategic policy in an adopted development plan and the Wheatley Neighbourhood Plan Review in breach of the “basic conditions”.

## 8. Changes Required

8.1 We maintain that the Wheatley Neighbourhood Plan Review, as drafted, does not meet the “basic conditions” for it to be lawfully made. Alterations to the document are required if the preparation process is to proceed.

8.2 We conclude that there are two broad ways in which the document could be altered to comply with the basic conditions:

- Redraft the design guidance and codes to reflect the development authorised by the extant planning permission for the campus site and the strategic allocation for redevelopment in the adopted Local Plan;
- Alter the draft WNP to confirm that the Design Guidance and Codes do not apply to the Campus site.

8.3 The above are considered in turn

### **Amendments to Design Guidance and Codes**

8.4 The design guidance and codes could be modified to reflect the parameter plans that accompany the extant planning permission for the site and Policy STRAT 14 of the Local Plan. However, this would involve significant work.

8.5 We conclude also that the above would add no value to the planning process. This is because the re-drafted guidance must simply reiterate what has already been approved as part of the grant of planning permission.

8.6 Whilst we have no objection to this approach, as a matter of principle, it would not appear to be a pragmatic use of the Parish and District Council's resources.

### **Exclude the Campus from the Remit of the Design Guidance and Codes**

8.7 This could be achieved with two relatively straight forward amendments to the Draft Neighbourhood Plan Review and the accompanying Design Guidance and Codes.

8.8 Policy H1 of the Draft Neighbourhood Plan Review could be modified to confirm that the Design Guidance and Codes do not apply to the Campus. The explanatory notes could explain that this is because a robust design framework for the redevelopment of the site is already in place.

8.9 The Design Guidance and Codes could be modified through the removal of reference to the Campus site in the character areas and other provisions.

8.10 We conclude that the second option offers the most expedient way for the Neighbourhood Plan Review to proceed and to satisfy the basic conditions. The University is willing to discuss the proposed amendments with the Neighbourhood Plan Group and District Council and suggests that this may be the most expedient way forward for all parties.

8.11 In the meantime, the University reserves the right to make further comments on the Neighbourhood Plan Review and will continue to engage in the review process with the objective of removing conflict between the Neighbourhood Plan and the extant planning permission and strategic allocation for the redevelopment of the Campus.

8.12 The University asks to be kept informed by the District Council on the next steps in relation to the review of the Wheatley Neighbourhood Plan, including its examination. The University requests the opportunity to take part in any examination hearings.



# Contact details

## Enquiries



@avisonyoung.com

**Visit us online**  
[avisonyoung.com](https://www.avisonyoung.com)

---

### **Avison Young**

3 Brindleyplace, Birmingham B1 2JB

Copyright © 2023. Avison Young. Information contained in this report was obtained from sources deemed reliable and, while thought to be correct, have not been verified. Avison Young does not guarantee the accuracy or completeness of the information presented, nor assumes any responsibility or liability for any errors or omissions therein. All opinions expressed and data provided herein are subject to change without notice. This report cannot be reproduced, in part or in full, in any format, without the prior written consent of Avison Young.

# Response 12

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email. Please see attachments.

Q3. You can upload supporting evidence here.

- File: WHEATL~1.PDF [REDACTED]
- File: LANDWE~3.PDF [REDACTED]

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Director
<b>Organisation (if relevant)</b>	CBRE
<b>Organisation representing (if relevant)</b>	Ptarmigan Land Limited
<b>Address line 1</b>	Henrietta House
<b>Address line 2</b>	Henrietta Place
<b>Address line 3</b>	-
<b>Postal town</b>	London
<b>Postcode</b>	W1G 0NB
<b>Telephone number</b>	-
<b>Email address</b>	██████████@cbre.com

South Oxfordshire District Council  
135 Eastern Avenue  
Milton Park  
Abingdon  
OX14 4SB

1<sup>st</sup> March 2023

Dear Policy Team,

## Wheatley Neighbourhood Plan – First Review

On behalf of Ptarmigan Land Limited (hereafter 'Ptarmigan'), we welcome the opportunity to submit a response to the Wheatley Neighbourhood Plan – First Review.

As the Council will be aware, Ptarmigan's interest principally relates to Land West of Junction 8a which is being promoted as a strategic employment location. The site interest of Ptarmigan is not located within the administrative area covered by the Wheatley Neighbourhood Plan, however, the potential of the site clearly has a role in delivering upon the Vision set within the Wheatley Neighbourhood Plan, particularly as it relates to the management of freight. Given that SODC themselves are continuing to advance with preparations for a New Local Plan (with Vale of White Horse) in the interests of strategic and joined up planning it is appropriate to utilise this consultation opportunity to contextualise the benefits associated with strategic development to the Land West of Junction 8a as it relates to some of the themes in the Wheatley Neighbourhood Plan.

### **The Site**

The site comprises two distinct blocks of land and is located just outside the Neighbourhood Plan boundary. The parcel to the north extends to approximately 40 acres and is shown edged green on Figure 1. The second parcel extends to approximately 7.50 acres and is shown edged green on Figure 1. Both parcels of land are located immediately adjacent to the existing built form of the Oxford Motorway Service Area and Junction 8a of the M40 motorway. The northern block of land is currently in arable use whilst the southern block remains unoccupied.

The topography of the land is largely flat and featureless with the main site surrounded by an established tree belt (not subject to Tree Presentation Orders). The site is not crossed by electricity pylons and the northern boundary abuts Flood Zones 2 and 3. There is a public right of way that bisects the site from the west to east and terminates at the grade separated junction.

Figure 1



**What is the Relevance to the Wheatley Neighbourhood Plan?**

The Wheatley Neighbourhood Plan First Review is clear that HGVs travelling through the village are real issues being experienced by residents. From poorer air quality and noise pollution, to the incongruous nature and unsuitability of some of these vehicles in a historic village context, it is clear that respondents to the Neighbourhood Plan process have cited this as an issue. Figure 4.1 of the Neighbourhood Plan overwhelmingly presents traffic and flow as a key issue for residents.

The very real challenges experienced in Wheatley are not surprising when its location in the wider freight network that surrounds Oxford City is considered. As seen from Figure 2 below, Wheatley is located on the key A40/Junction 8a route which, by HGV volumes, represents the greatest flows of HGVs from the strategic road network around Oxford.

In recent years there has been a notable increase in freight movements following the associated rise in online shopping. Logistics space has become “critical infrastructure” that supports the day to day function of society. It is something that needs to be appropriately planned for to avoid negative unintended consequences arising.

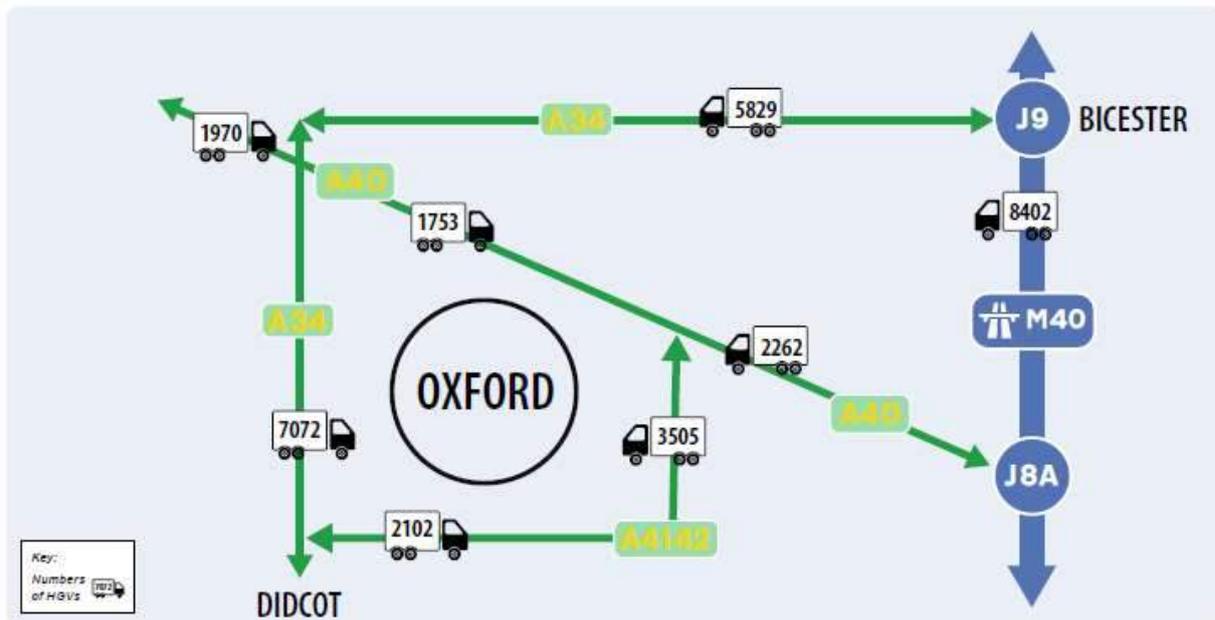


Figure 2 – HGV Movements on Roads Around Oxfordshire

Land at Junction 8a is proposed as an industrial and logistics location to serve SODC and Oxfordshire. Whist strategic in scale it will deliver local benefits. For places like Wheatley Parish it has the potential to deliver tangible benefits that reflect the aspirations of the Neighbourhood Plan. With operators continually looking at ways to consolidate their freight to ensure more efficient and effective ways of moving it around, the Land West of Junction 8a is strategically placed to allow for HGV trips to be ‘terminated’ sooner from the strategic road network and brought onto smaller vehicles for more localised delivery into and surrounding Oxford City. Increasingly, smaller freight vehicles can and are utilising improvements in electric vehicle technology that do not currently exist for much larger HGVs. The issue of consolidating freight is becoming an increasingly important issue within Oxfordshire as the Council seeks to role out the Oxford City Zero Emission Zone.

The benefits of Junction 8a are included in the enclosed Vision Document and include:

- Opportunity for consolidation of freight and with it Air Quality Improvements to assist in realising the potential of the Oxford City Zero Emission Zone
- Reduced HGV traffic in more sensitive locations such as Wheatley
- Support Oxford’s Sustainable Economic Growth
- Potential For 430 FTE Jobs (including the potential to support employment from Wheatley Parish)
- 35,000 Workforce located within a 20 minute Bus Journey
- Education Skills and Training
- Sustainable Construction and Building Materials
- Blue, Green & Wild Infrastructure for Biodiversity Net Gain
- Sustainable Freight Solutions
- 15 Minutes to Oxford City Centre
- Sustainable Location for Logistics Infrastructure

We would be grateful if you could confirm receipt of these representations and look forward to working with Policy Officers and the Parish Council.

Yours sincerely,



Director  
cc. [REDACTED] - Ptarmigan Land

Enclosed – Appendix A – Vision Document

# VISION STATEMENT

Land to the West of Junction 8a, M40,  
Waterstock, Oxfordshire

**Date: October 2021**

Document Prepared for:  
**Ptarmigan Land**



**PTARMIGAN** 1

# VISION STATEMENT

## Benefits of Land West of Junction 8a

Land at Junction 8a is proposed as a highly sustainable logistics hub that benefits from its location adjacent to the M40 motorway and A40 transport corridor. The opportunity exists to deliver a high quality facility that can contribute to a range of wider sustainability and environmental objectives, its benefits could see:



**Potential for 430 FTE Jobs**



**Education Skills and Training**



**Opportunity for Consolidation Centre removing freight traffic from the A40 corridor**



**35,000 Workforce in 20 minutes Bus Journey**



**Air Quality Improvements**



**Sustainable Construction and Building Materials**



**Contribute to Infrastructure for Oxford City Zero Emissions Zone**



**Blue, Green & Wild Infrastructure for Biodiversity Net Gain**



**Support Oxford's Sustainable Economic Growth**



**Sustainable Freight Solutions**



**Sustainable Drainage Solutions**



**15 Minutes to Oxford City Centre**



**Sustainable Location for Logistics Infrastructure**

# INTRODUCTION

## Ptarmigan Land

Ptarmigan Land is promoting the Land to the West of Junction 8a as a critical piece of logistics infrastructure for the Oxfordshire 2050 Plan.

Whilst delivering much needed logistics space to support the appetite for economic growth in Oxfordshire, the site is also strategically located to be able to contribute to realizing wider ambitions to reduce freight movement into Oxford City along the M40/A40 corridor. In addition it has the ability to contribute toward innovation in sustainable freight and movement technologies whilst providing facilities that will support the anticipated implementation of the Oxford City Zero Emission Zone (ZEZ).

Ptarmigan pride themselves in working closely with landowner partners, Councils and other stakeholders to ensure they understand their aspirations and deliver on any specific issues and key strategic priorities. As a company they specialise in promoting large scale strategic development. Locally they are currently involved in the regeneration of Berinfield in partnership with South Oxfordshire District Council. More broadly they are involved in major schemes in Chelmsford, Hertfordshire & Surrey.

## UMC Architects

UMC are specialists in industrial and commercial architecture and are experts in incorporating cutting edge materials and sustainable principles. With BREEAM accreditation and WELL credentials UMC are keen to unlock the sites potential and deliver a high-quality responsible scheme not only for the occupiers but also the local population and the environment.

## The Site

Whilst located in the administrative area of South Oxfordshire, Junction 8a is of strategic importance to Oxford City, and Oxfordshire more broadly, in connecting it to the strategic road network.

The site comprises two distinct blocks of land. The parcel to the north extends to approximately 40 acres and the second parcel extends to approximately 750 acres with both located immediately adjacent to the Oxford Motorway Service Area and the northbound carriageway of Junction 8a of the M40 motorway. The northern block of land is currently in arable use whilst the southern block remains unoccupied scrubland and hardstanding. The topography of the land is largely flat and featureless with the main site partly bound by intermittent tree lines (not subject to Tree Presentation Orders). It is not crossed by electricity pylons and the northern boundary abuts Flood Zones 2 and 3. There is a public right of way that bisects the site from the west to east and terminates at the grade separated junction.

The site offers opportunities to integrate with the surroundings and local pedestrian/ cycle links. The Public right of way that intersects the site from east to west is to be diverted and incorporated into significant landscaped areas offering areas of seclusion not only for the workforce but also the local community. The scheme design will be based around sustainable and wellness principles to ensure the best possible working environment.



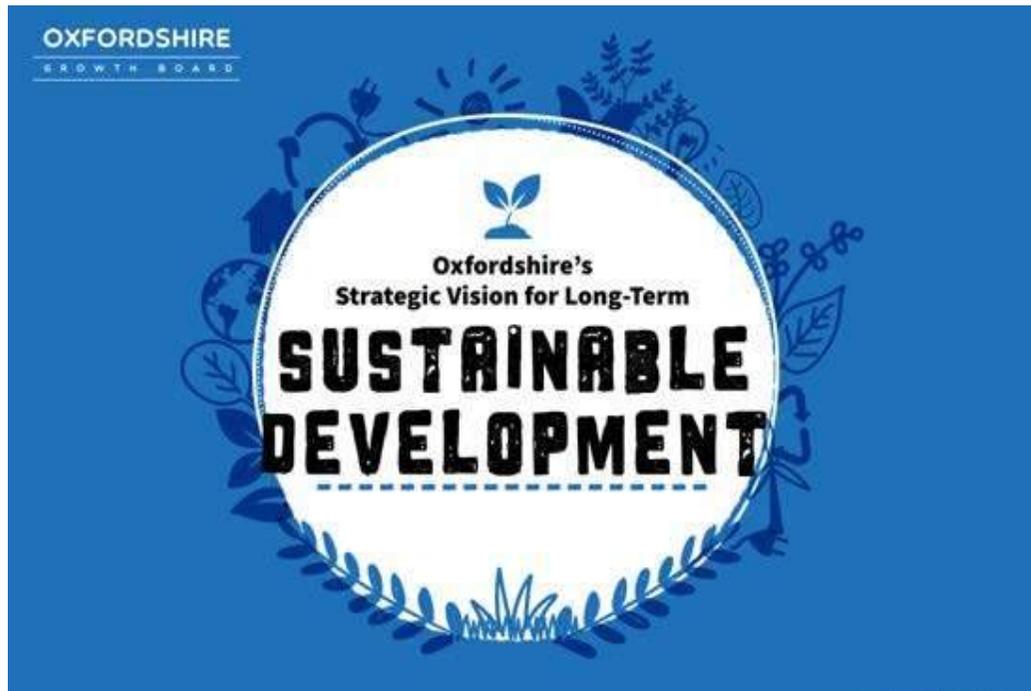
# INTRODUCTION & PRINCIPLES

## Structure of Vision Document and Delivering 'Good Growth'

The Vision Document is very much at the earliest stage of the development concept for the site, and we look forward to engaging with stakeholders and the local community in the coming months to further populate the vision and to demonstrate the opportunity to deliver economic, social and environmental objectives.

In providing a structure to the Vision Document we have adopted the key components to 'Good Growth' in line with the vision established in Oxfordshire's Strategic Vision for Long-Term Sustainable Development (July 2021). In adopting this structure, we highlight how the Land West of Junction 8a fits within the established 'Good Growth' Objectives.

The Vision Document includes a Concept Masterplan to help in visualising the opportunity.



## Oxfordshire Six Core Good Growth Principles

1. Enhance the historic and natural environment
2. Support a diverse high-value economy
3. Be high-quality and resilient to change
4. Embrace innovation and technology
5. Be sustainable, clean and green
6. Be healthy and inclusive



# ECONOMY



## Providing Logistics Infrastructure to Support Economic Ambition

### Good Growth Objective (2) Support a Diverse High-Value Economy

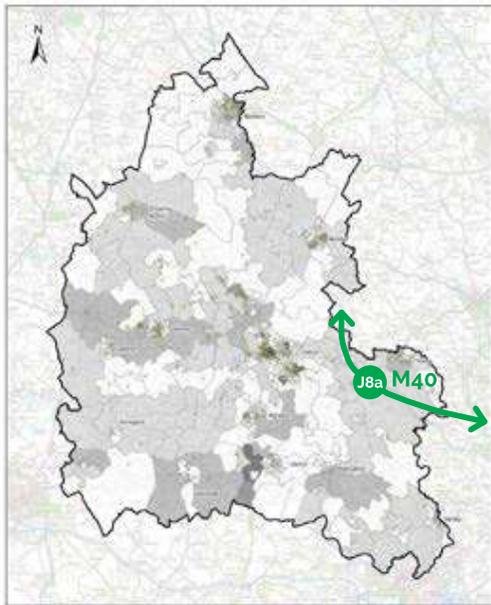
The Oxfordshire Growth Needs Assessment (OGNA) supports the need for 314 hectares of warehousing and logistics land by 2050.

The OGNA also identifies the need for much larger logistics and warehouse facilities to help in supporting increased economies of scale.

The provision of high-quality logistics infrastructure responds to Growth Objective (2). Oxford is specifically identified as a location in the Government's Industrial Strategy as an area that contributes to Britain's status as a global leader in key fields of innovation. In the context of Paragraph 81 of the NPPF (2021) this places greater emphasis on the need to ensure that sufficient logistics space is planned for to facilitate growth and innovation.

The Freight Study (2019) for England's Economic Heartland (within which Oxfordshire is located) also notes:

**'Efficient logistics is a fundamental requirement of a successful economy. Fast, frequent, and low-cost freight transport allows businesses to reach suppliers and markets and encourages businesses to invest.'**



## Why Land West of Junction 8a?

Figure 1 highlights the significant concentration of jobs in Oxfordshire that exist within the Oxford City administrative area. Junction 8a is the closest of the M40 junctions to Oxford City as well as key employment locations in South Oxfordshire such as Culham Science Park.

The OGNA confirms that there is a significant disparity in the way in which industrial land is provided for across Oxfordshire.

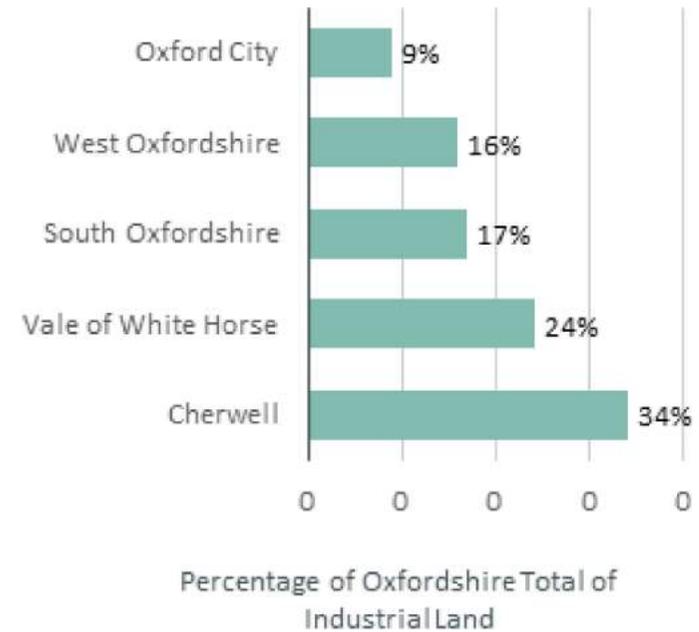


Figure 1

Given the tightly drawn administrative boundary of Oxford City it is perhaps not surprising that there is significantly less industrial land in the area when compared against the other employment land. However, it does emphasise the dependency of Oxford City on the adjoining authorities, including South Oxfordshire as the authority with the closest connection to the M40, to deliver this growth.



# INFRASTRUCTURE & LOGISTICS



## Providing Infrastructure to Support Planned Housing Growth

### Good Growth Objective (4) Embrace Innovation and Technology

#### The Demand for Retail Warehouse Space

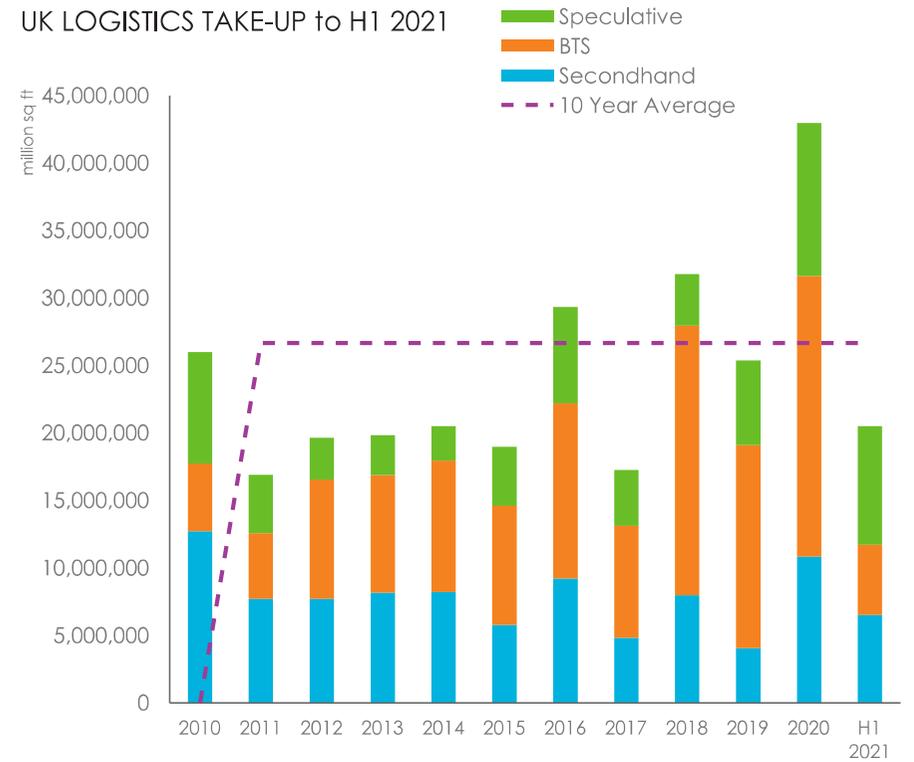
Innovation and technological advances have rapidly changed the way that we shop, and this has been further accelerated during the pandemic. As part of Good Growth Objective (4), Oxfordshire needs to positively plan for the technological change that is happening in online retail and, in turn, the consequences of this for logistics provision.

Research undertaken by Turley's in partnership with the British Property Federation has indicated that the rise of online shopping and last mile delivery has created a need for circa 69 sqft of warehouse space per home. Assuming that the Oxfordshire Plan (2050) delivered 100,000 homes this is equivalent to 7,800,000 sqft of warehouse space.

Research undertaken by CBRE confirms that the total take-up in 2020 at 42,970,000 sqft was 35% higher than the previous 'record' year of 2018. In Q2 2021, take-up at 15,600,000 sqft is the highest on record marking the third record-breaking quarter in the past 18 months. Online retail accounted for 42% of take-up in during the first half of 2021. The rise is significant and recent and is not accounted for in the evidence bases that support the adopted local plans in Oxfordshire.

For sites over 100,000 sqft, within the M40 corridor, research by CBRE has indicated 20 deals over the last 15 months alone. The provision includes just 3 second-hand units and 13 of the 17 new build units have all been speculative, highlighting the significant demand in this sector and the M40 corridor.

UK LOGISTICS TAKE-UP to H1 2021



Source: CBRE



**PTARMIGAN**

# LOCATION

## Why Land West of Junction 8a?

There is a clear need to deliver logistics infrastructure close to where people live. This has the mutual benefits of allowing goods and services to be delivered more expediently and reducing the time that delivery vehicles are on local networks for. Figure 2 shows the distribution of population in Oxfordshire and demonstrates the overwhelming primacy of the City of Oxford with over 3 times the population of Banbury and 5 times the population of Bicester.

More poignantly in the context of planned future growth, Figure 3 highlights the spatial distribution of planned allocations and again reaffirms the extent of growth occurring in and around Junction 8a of the M40 (this is without considering the significant planned growth occurring in neighbouring Aylesbury Vale). As show in Table 1, Junction 8a is the closest of the M40 Junctions to Oxford City.

The site can deliver green technologies such as electric vehicles and electric vehicle charging points and the possible use of battery storage facilities. It is also strategically located next to Junction 8a truck refuelling services with facilities for overnight stays, making it perfect for HGV's that have dropped off at site.

In addition, appropriately located logistics/consolidation centres are becoming an increasingly important asset in helping supply chain deliveries become more sustainable. Recent examples of this include the Heathrow Consolidation Centre was established in 2001 for the ongoing work at Heathrow airport. The house builder Taylor Wimpey has also set up Taylor Wimpey Logistics which consolidates materials in a Newmarket facility that then provides for its sites across England and Wales.

Guy's and St Thomas' Trust set up an off-site consolidation centre at Dartford with the aim to consolidate 90% of truck deliveries. The business case also identified a number of other benefits from adopting an off-site model including:

- Space - over 1,300 sq m of space could be freed up for clinical use by using the consolidation centre to re-design processes and move bulk storage of products such as IV fluids off-site.
- Overhead - different product lines could be cross-docked off-site to enable an integrated on-site team to put-away once, reducing overhead costs by over 30%.
- Waste - outer cardboard packaging to be removed at the consolidation centre reducing delivery volume and designing out on-site waste collection

The examples above highlight the way in which logistics consolidation can help in driving improved efficiencies.

Location	Distance to Oxford City Centre (Miles)*	Typical Journey Times (Minutes)*		
		AM Peak Hour (08:00 – 09:00)	Off Peak Hour (12:00 – 13:00)	PM Peak Hour (17:00 – 18:00)
M40 – Junction 6	15.4	22 - 45	22 - 40	20 - 40
M40 – Junction 7 – N'bnd Exit Only	10.2	20 - 40	18 - 40	18 - 40
<b>M40 – Junction 8 – N'bnd Exit Only</b>	<b>8.9</b>	<b>16 - 40</b>	<b>16 - 35</b>	<b>16 - 35</b>
<b>M40 – Junction 8a</b>	<b>8.0</b>	<b>16 - 40</b>	<b>16 - 35</b>	<b>16 - 35</b>
M40 – Junction 9	11.8	18 - 35	18 - 35	18 - 35
M40 – Junction 10	17.6	24 - 45	24 - 45	24 - 45
M40 – Junction 11	28.0	30 - 55	35 - 60	30 - 60

Table 1



# LOCATION

OXFORDSHIRE POPULATION DENSITY AND DISTRIBUTION

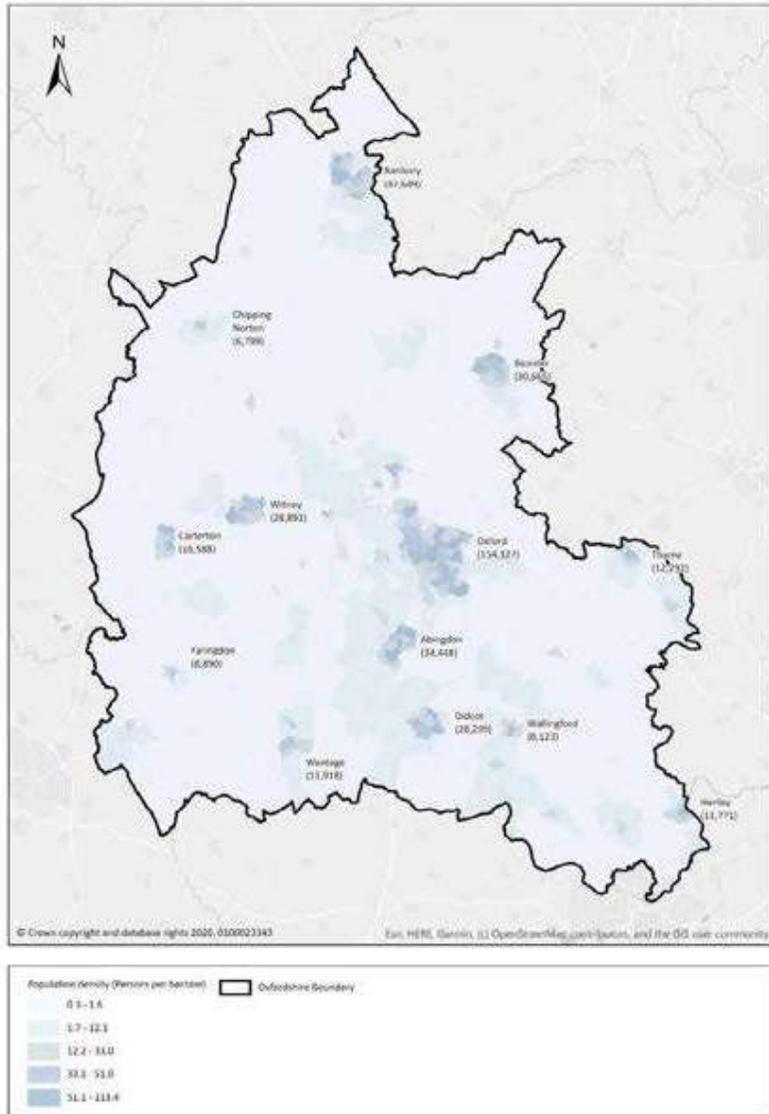


Figure 2 - Taken from Oxfordshire Plan 2050

LOCAL PLAN ALLOCATED SITES 2011-2031/5/6

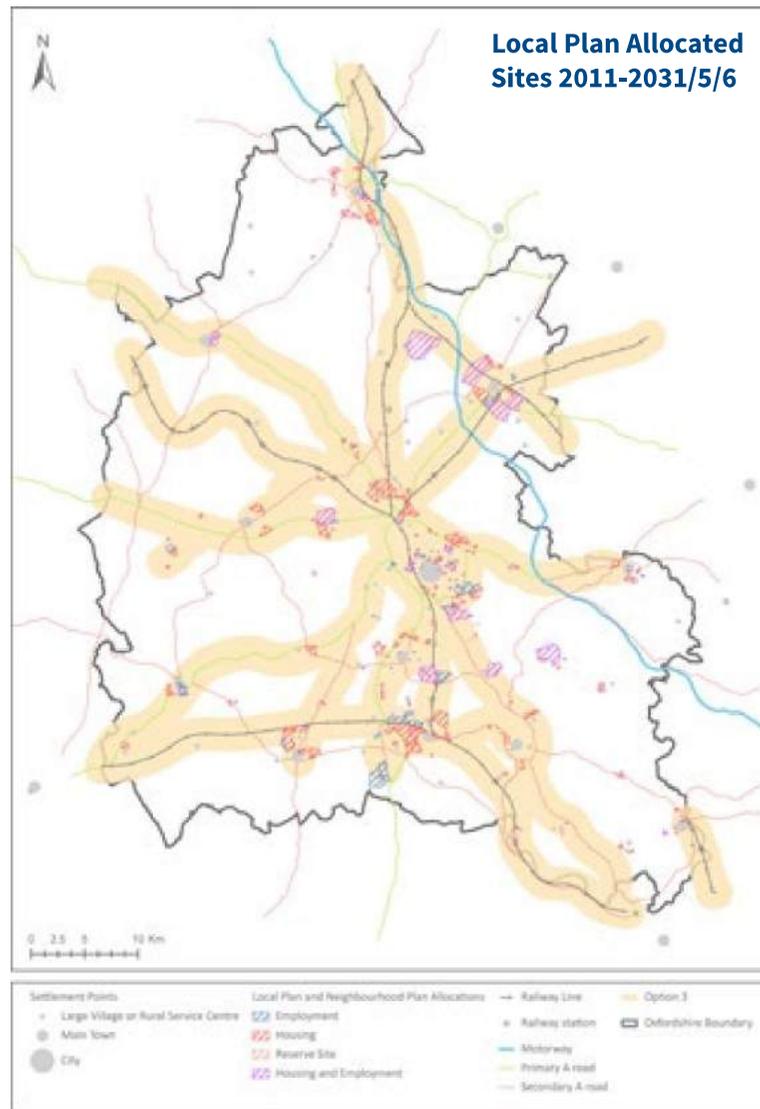


Figure 3 - Taken from Oxfordshire Plan Regulation 18 (Part 2)



# AIR QUALITY

## Opportunities to Reduce HGV Movements in Oxfordshire and Improve Air Quality



Good Growth Objective (4) Embrace Innovation and Technology



Good Growth Objective (5) Be Sustainable, Clean and Green

There are currently 13 designated Air Quality Management Areas (AQMAs) in Oxfordshire. These are areas where nitrogen dioxide levels exceed national air quality objectives. As shown in Figure 4 below, the spatial distribution of AQMAs in Oxfordshire. This highlights concentrations in Oxford City and South Oxfordshire District Council.

Oxford County Council has recently calculated the relative contributions which different sources make to concentrations of nitrogen dioxide within its AQMA. Across the three representative worst-case locations considered, emissions from traffic on nearby roads contributed between 56% and 77% of NO<sub>2</sub> in 2018. Goods vehicles (Light Goods Vehicles (LGVs) and Heavy Goods Vehicles (HGVs)) contributed between 11% and 34% of this local traffic incremental increase to NO<sub>2</sub>.

In an effort to seek to reduce this measure No.4 in the South Oxfordshire Air Quality Action Plan includes 'Feasibility study for freight consolidation centre / freight quality partnerships.' In addition, measure No.28 of the Oxford City Air Quality Action Plan includes 'Explore opportunities for implementation of consolidation centre to address city centre freight emissions.'

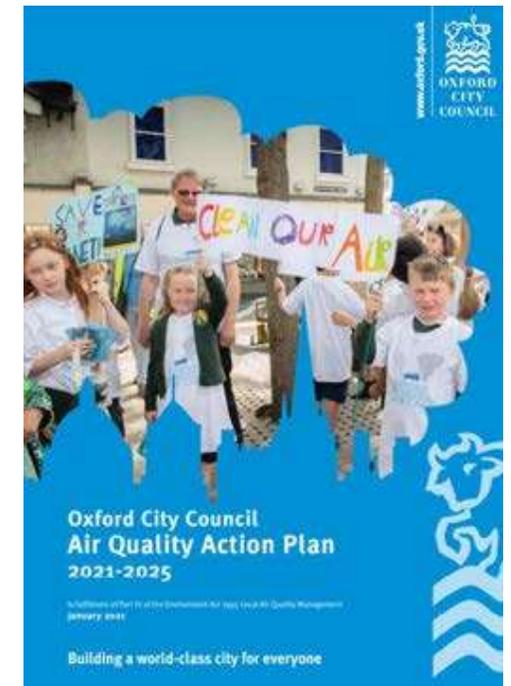
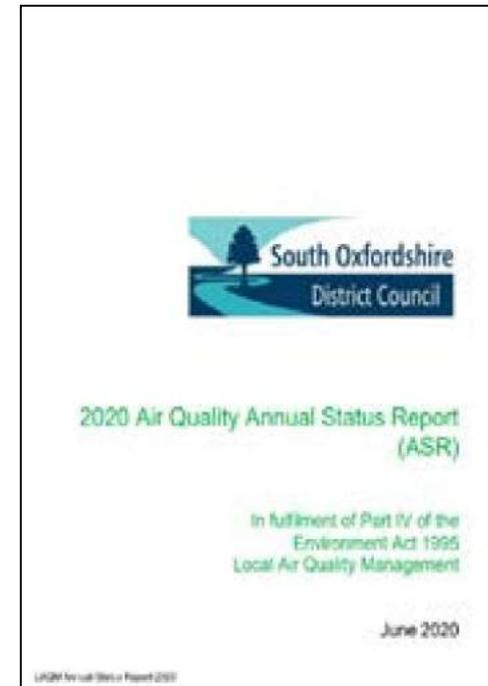


Figure 4 - Taken from Oxfordshire Plan Regulation 18 (Part 2)



# ZERO EMISSIONS ZONE

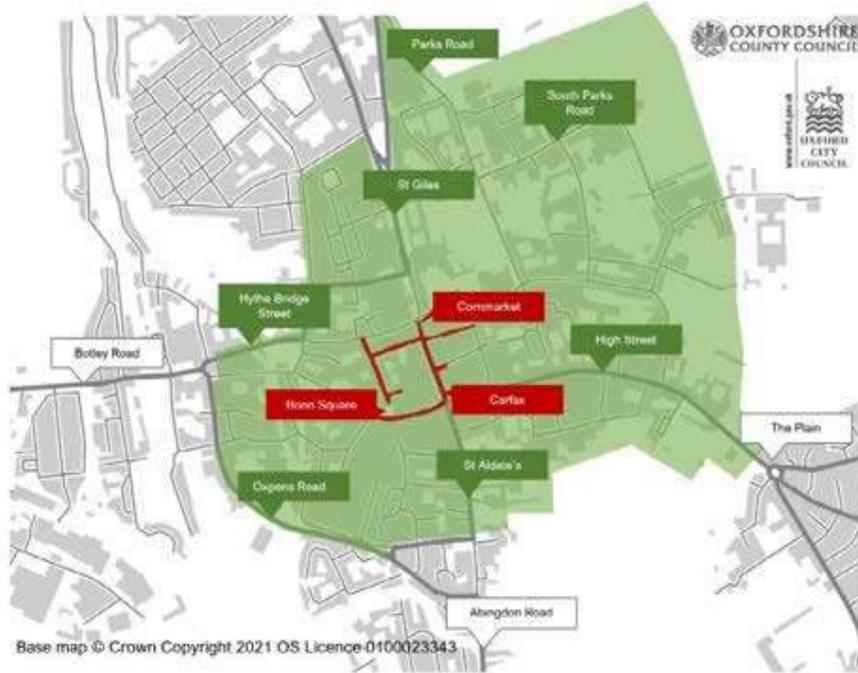
Oxford City has plans for the roll out of a city wide Zero Emissions Zone in an effort to tackle air pollution within the area. The delivery of this ambition will require the delivery of key strategic infrastructure.

Junction 8a is strategically located to help in reducing the number of HGV trips that are made into the local road network, notably Oxford City Centre. Our research indicated that currently around 2,000 LGV and HGV pass the site daily on the eastbound carriageway to Oxford City.

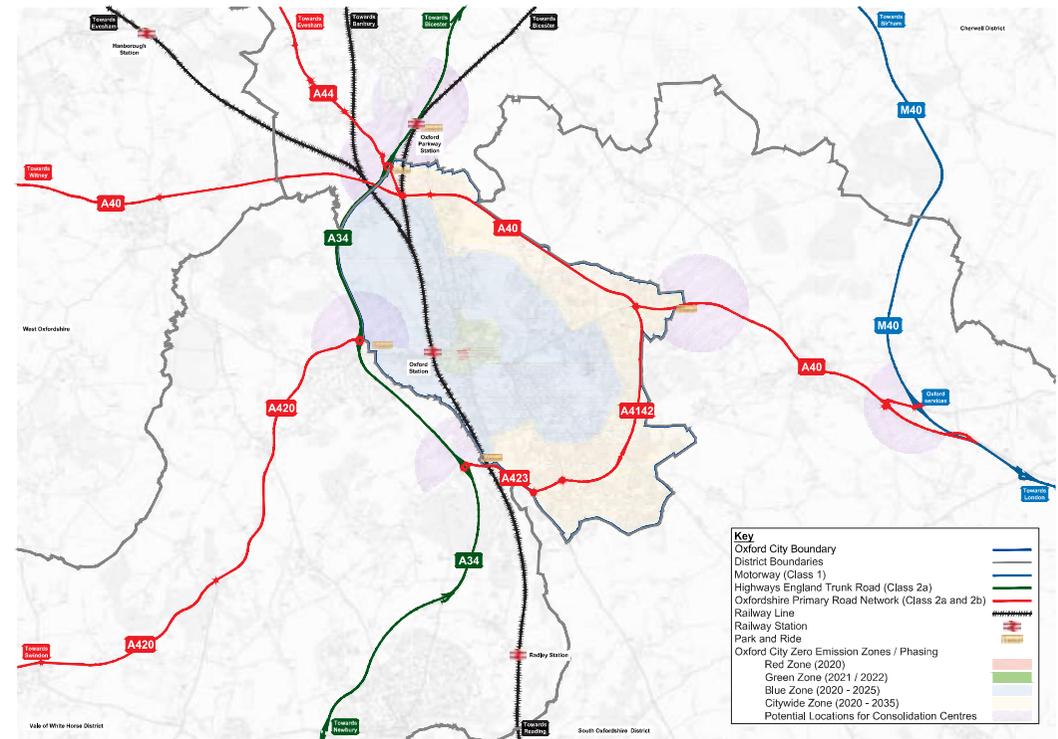
Electric vehicle charging facilities are available and promote the use of electric/sustainable last mile vehicles.

The potential benefits of the proposals on improving air quality are vast and include (inter alia):

- Reduce volumes of HGVs on local roads;
- Reduce volumes of LGVs on local roads;
- Reduce congestion in key areas;
- Travel plan initiatives for employees;
- Encouraging that all outbound freight is carried using zero-exhaust emission vehicles.



Oxford ZEZ Map



# ACCESSIBILITY



## Providing Jobs in the Right Location

Good Growth Objective (5) – Be Sustainable, Green and Clean

### Ability to Access Sustainably

Paragraph 83 of the NPPF (2021) requires that logistics development is prioritised in suitably accessible locations.

### Existing Accessibility and Future Accessibility

Sustainable travel options in the form of walking, cycling and bus provisions exist to allow the site to be sustainably located to a local workforce. Thame to the East and Oxford City to the west provide population catchments within a 20 minute bus ride of the site. There are currently around 35,000 people that live within this catchment and can therefore benefit from convenient sustainable travel.

The site already benefits from existing bus connections between Oxford, Wheatly and Thame, and the M40 service station is a significant employer which itself generates a number of trips. The X20 runs hourly from 7:09am to 7:09pm; The X8 runs twice daily at 7:36am and 5:54pm; The 275 runs three times a day from 7:37am to 4:59pm and the 280 Sapphire runs every 30 minutes from 6:01am to 9:46pm. It is important to recognise that, as the site will operate 24 hours, the availability of these services will need to be amended to meet the increased demand. Discussion with the relevant transport companies is required to facilitate the potential provision of earlier and later journey times for X20, X8 and 280 Sapphire, in addition to increased frequency of services for routes X8 and 275. Improved bus stop infrastructure will also be delivered as part of the development. These proposals have the potential to provide benefits to existing travel patterns, as well as, support and encourage sustainable modes of travel.

Figure 5 shows the catchment workforce that is within a 20 minute bus ride of the site. The plan also highlights opportunities for an extension to the existing cycle network as well as connections into the adjacent Oxford Services facility.

We have also plotted how an amended public right of way could be approached as part of further consideration to enhance the scheme and act as a meaningful alteration.

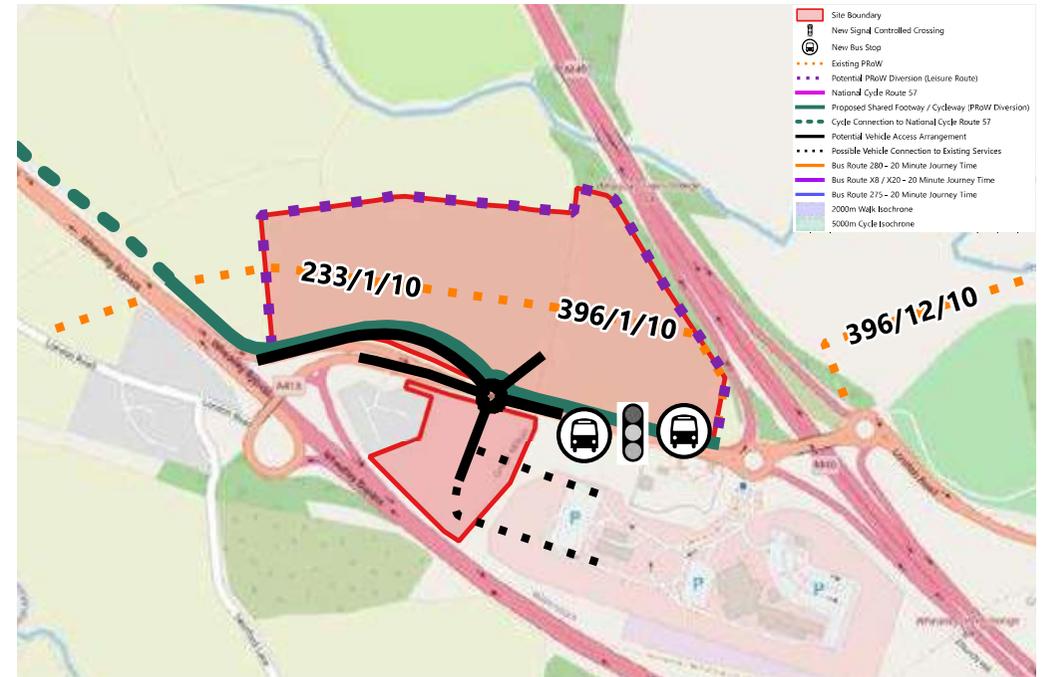
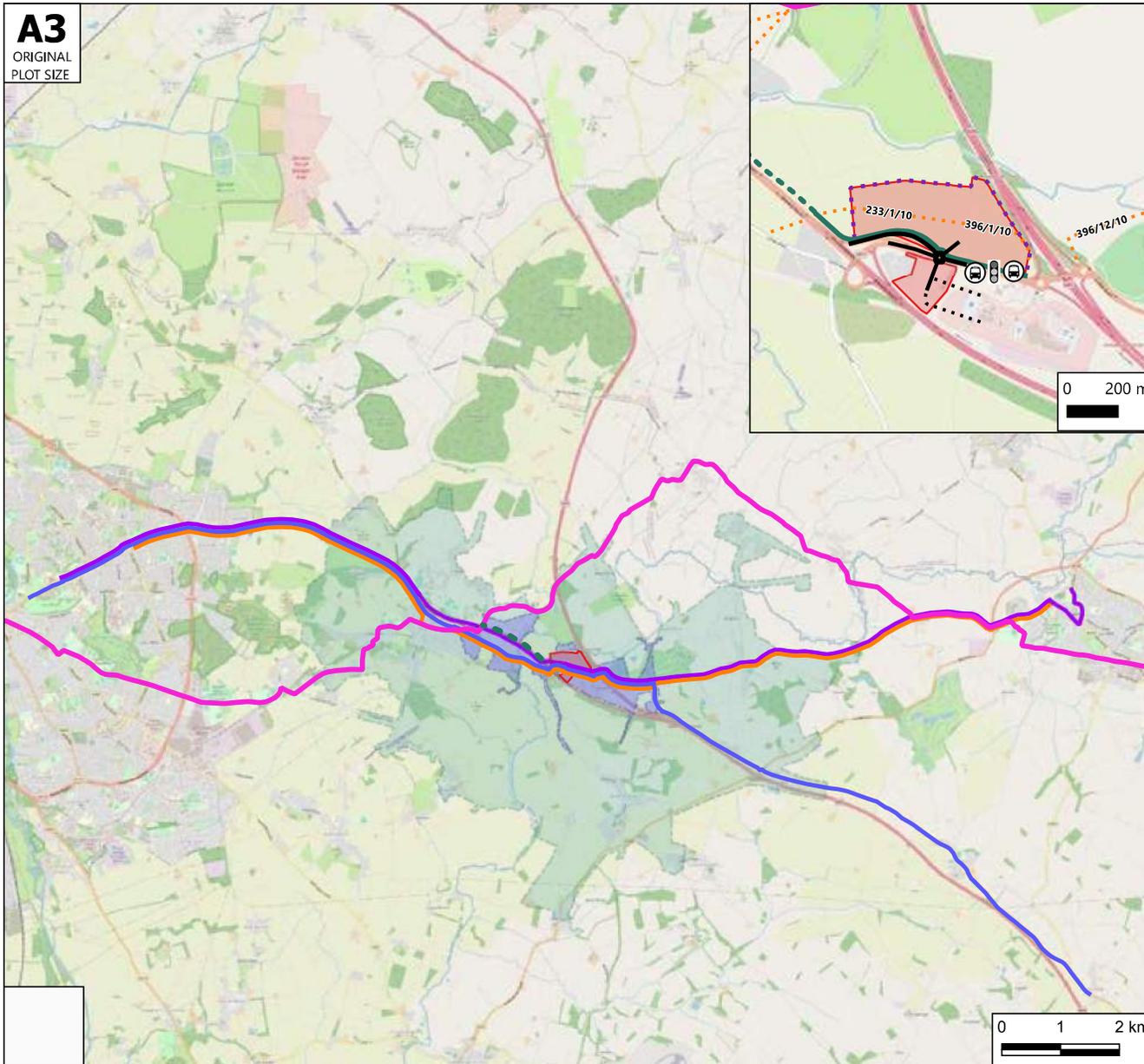


Figure 5

# ACCESSIBILITY

**A3**  
ORIGINAL  
PLOT SIZE



Mapping Reproduced from OpenStreetMap  
© OpenStreetMap contributors  
- Boundary Mapping based on data downloaded from OS Open Data

- Site Boundary
- New Signal Controlled Crossing
- New Bus Stop
- Existing PRoW
- Potential PRoW Diversion (Leisure Route)
- National Cycle Route 57
- Proposed Shared Footway / Cycleway (PRoW Diversion)
- Cycle Connection to National Cycle Route 57
- Potential Vehicle Access Arrangement
- Possible Vehicle Connection to Existing Services
- Bus Route 280 - 20 Minute Journey Time
- Bus Route X8 / X20 - 20 Minute Journey Time
- Bus Route 275 - 20 Minute Journey Time
- 2000m Walk Isochrone
- 5000m Cycle Isochrone

Rev	Date	Drawn by	Checked by	Approved by

  
 Transport Planning Associates  
 80 High Holborn  
 London  
 WC1V 8LJ  
 020 7111 1155  
 www.tpa.co.uk

CLIENT:  
PTARMIGAN

PROJECT:  
**THE TRIANGLE,  
WHEATLEY**

TITLE:  
**SUSTAINABLE TRANSPORT  
OPPORTUNITIES**

STATUS:  
**FOR INFORMATION**

SCALE: As Shown	DATE: 04/10/21	DRAWN: TW	CHECKED: RTBL	APPROVED: RTBL
JOB NO: 2006-052	DRAWING NO: Fig 5.B-12	REVISION: -		



# EMPLOYMENT



## Opportunities to Provide Jobs in the Right Location

### Good Growth Objective (6) – Be Healthy and Inclusive

In considering Paragraph 83 of the NPPF (2021) it is important that the accessibility to a workforce is considered in a 'real world' perspective for who will be employed at the site. For example, connectivity into an area with a heavy concentration of professional service workers is unlikely to demonstrate that the site is suitably located. Therefore, opportunities should be taken to provide jobs in areas in which they are needed.

Figure 6 shows the distribution of the Index of Multiple Deprivation Scores across Oxfordshire (blue indicates areas of highest deprivation). The IMD includes measures for income deprivation, employment deprivation and education, skills and training deprivation.

The Land West of Junction 8a is sustainably located in relation to these areas of deprivation such that the provision of a large employment generating use in close proximity could contribute to realising the plan's social objectives.

The technology involved in modern warehousing units results in a range of job profiles and skill sets being required.

It is anticipated that around 430 FTE could be provided by the facility. The site can make a significant contribution to delivering upon economic and social objectives and assist in wider levelling up initiatives by providing benefits in areas where they can have maximum impact.

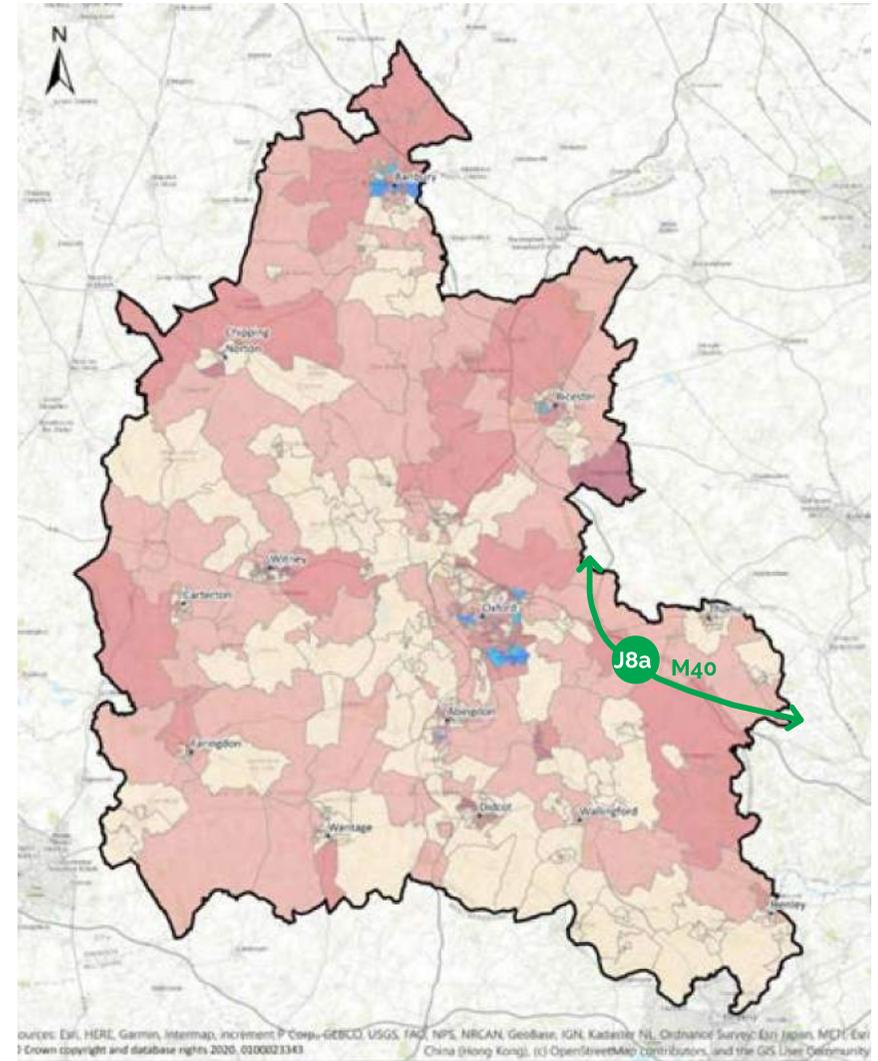


Figure 6



# GREEN INFRASTRUCTURE

## Green Belt

The Oxford Green Belt surrounds Oxford and over the 669km<sup>2</sup> area it covers it straddles five local authority areas (see Figure 7 Green Belt Map)

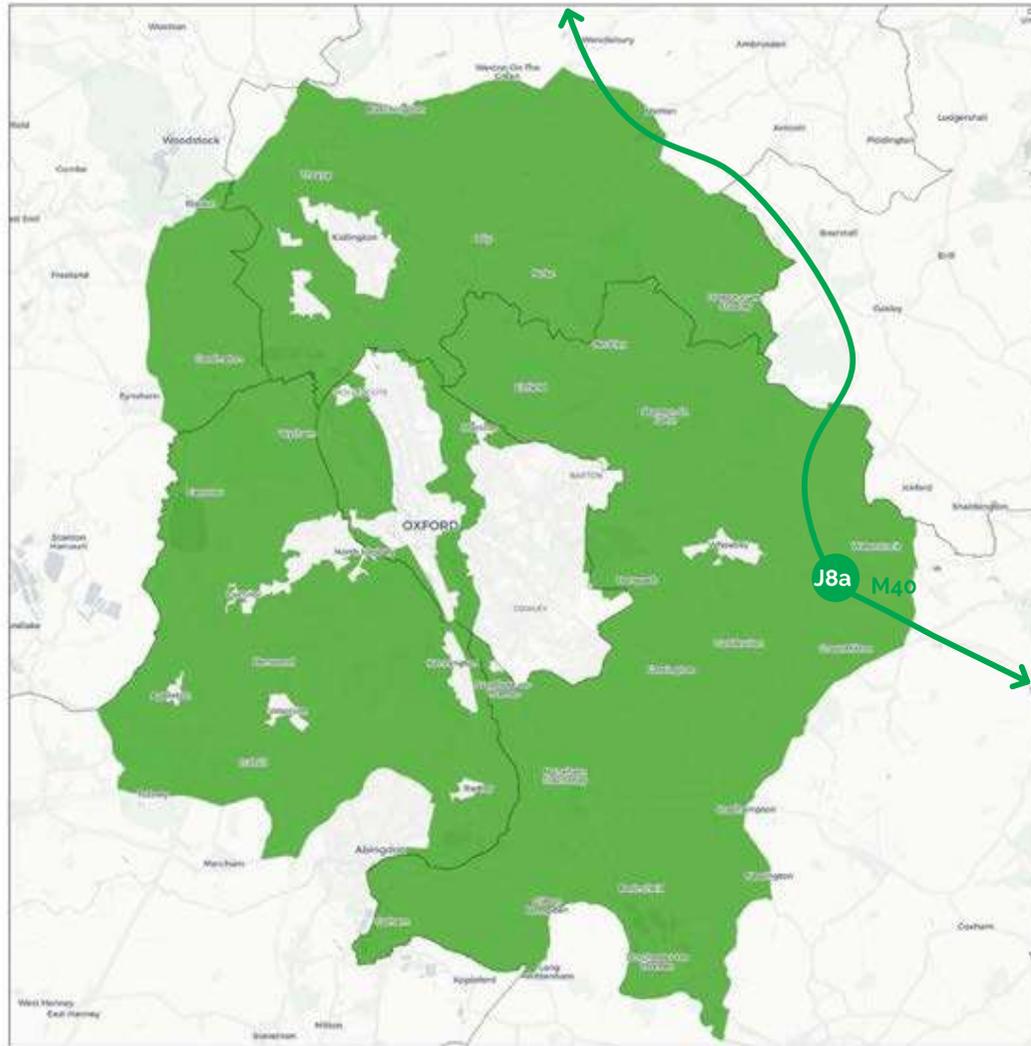


Figure 7

Both Oxfordshire County Council (OCC) and South Oxfordshire District Council (SODC) have undertaken Green Belt studies that consider, in part, the subject site. These studies are helpful, but both have their limitations as the studies are strongly influenced by their brief which was to assist in identifying land for "housing to meet local and Oxford demand" (SODC) and land "to accommodate sustainable forms, patterns and types of development" (OCC). This approach led to the study parcels being heavily focused on the land alongside and surrounding settlements within the study areas.

In light of the above the SODC assessment only considered Parcel 5a and Parcel 6's performance against the Purposes of Encroachment and the Setting of Historic Towns and the Purposes of Sprawl and Coalescence were not considered (see Figure 8), which the study site sits alongside as the parcels "do not include edge of settlement land"

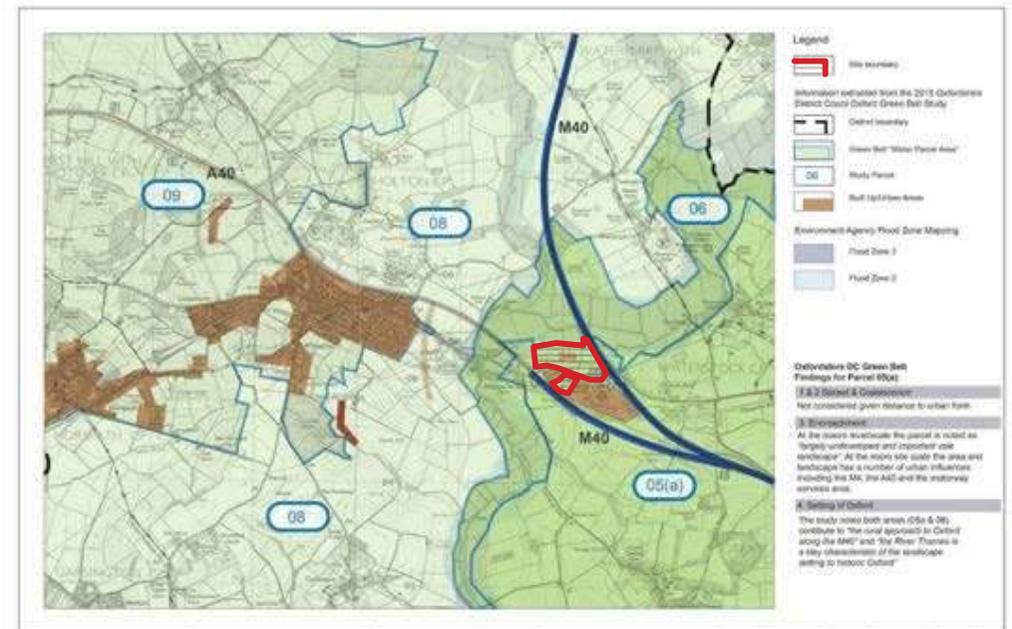


Figure 8



# GREEN INFRASTRUCTURE

## Green Belt Exceptional Circumstances

The economic, social and environmental benefits presented for the site in the preceding pages can only be realised through the development in this part of Oxfordshire.

To look beyond the Green Belt would reduce the ability to deliver a need where it is most needed.

Exceptional Circumstances to meet employment land is well acknowledged and has recently been confirmed as a sound approach in the Cambridge Local Plan (2018). The presence of the adjacent Oxford services and gypsy & traveller site also recognise the ability of this parcel of land to accommodate appropriate land uses in the Green belt.

As noted above the Oxfordshire Green Belt Studies (2015) did not assess many of the Green Belt Purposes when parcels were some distance away from existing urban form and/or Oxford city.

With regards to the Oxfordshire County Council Green Belt Study the parcels assessed that are located closest to the site include WH4 and WH5 (see Figure 9). These were assessed as making limited or no contribution across four out of five Green Belt purposes and medium contribution to preventing the

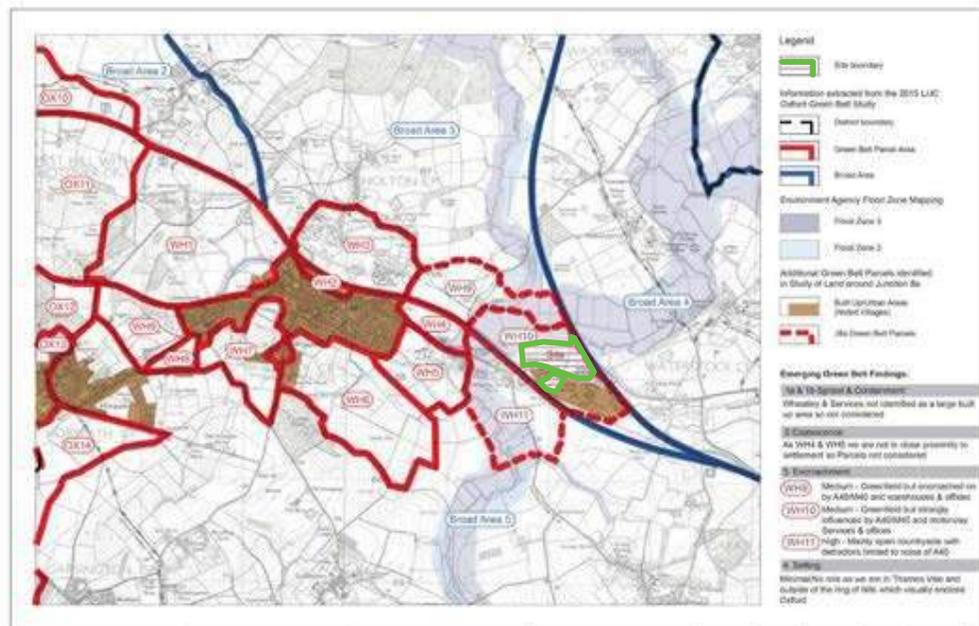


Figure 9

We have adopted the same methodology as the Oxfordshire County Council study to create Parcels WH10 (incorporating the site), WH9 and WH11. WH10 is identified as performing a medium contribution to the safeguarding of the countryside owing to the presence of significant road infrastructure and the service station adjoining the site.

It is important to note that the presence of the river and its flood zone seeks to act as a natural barrier to the spread of development. In addition, the road infrastructure that surrounds WH10 also limits the extent to which ribbon development would occur along the M40, A40 routes.

Our assessment of the land to the east and south of parcels WH10 is any notable development in this more open and exposed landscape would give rise to significant encroachment which, on this one purpose alone, would lead to the landscape being considered to provide a 'high' Green Belt performance/role.

As shown in Figure 10 the site is visually separated from the city by Wadley Hill and Castle Hill/Shotover Hill. In contrast, the A34 corridor has a notable visual interrelationship with the city. Any development along this corridor has the potential to significantly affect the setting of the city and its interrelationship with the green and wooded hills that surround it.

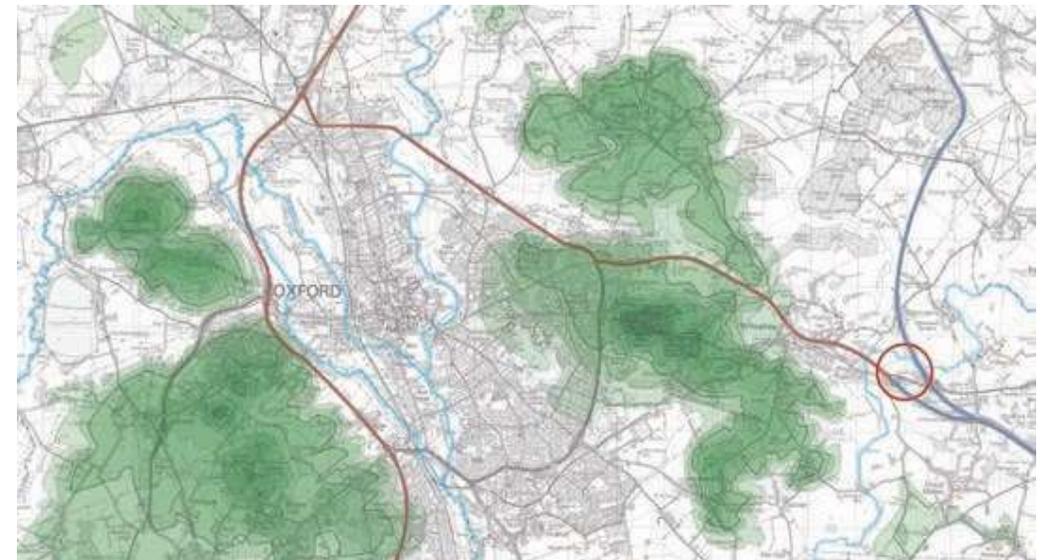


Figure 10

# NATURAL ENVIRONMENT



## Good Growth Objective (1) Enhance the Historic and Natural Environment

The quantitative need for logistics growth in Oxfordshire to support planned housing growth and its economic ambitions, in addition for a qualitative trend for larger units and a functional need for such uses to have a relationship with the strategic road network will necessitate previously unallocated land (rather than previously developed) be identified both at the regional and local level.

In responding to the need to balance the imperative for growth against the historic and natural environment, in this section we have sought to capture the baseline position of the site to demonstrate that there are no impediments to the delivery of the site. These in turn have been used to establish the 'baseline' position for the purpose of considering initial concept sketches for the site.

### Natural Environment – Biodiversity

In September 2021 Logika undertook a site walk cover to consider the ecological value of the site.

There is one non-statutory designated Local Wildlife Sites (LWS) and one non-statutory designated Conservation Target Area (CTA), but no Sites of Special Scientific Interest (SSSI) within 2km of the site boundary.

As seen in Figure 11, the biodiversity value for the site is mainly contained to the edge of the site with the majority of the northern site currently under intensive agricultural use.

The site borders a Nature Recover Network as identified in the evidence base supporting the Oxfordshire Plan (2050).

The areas of the site which lie within the 'Recovery Zone' of the Nature Recovery Network, will be protected and not developed. Instead, they provide opportunities for biodiversity gain, and the enhancement of the local wildlife networks which could be holistically integrated with flood protection, air quality, and health and well-being.

A buffer of approximately 20m will be provided adjacent to the UKBAP priority woodland located in the northeast of the northern site. This will ensure that this habitat is protected. Logika recommend that reptile habitats and dark corridors could be combined with green open space, and foraging habitats could be created with new natural SuDS for bats, birds, and reptiles.

They also note that increased connectivity could be created across the site through hedgerow and tree planting, and / or the enhancement of existing hedgerows by including additional species diversity, filling of gaps, and ensuring that these features are kept dark. This will be especially beneficial in an east to west direction, and will provide new habitats for birds, amphibians, reptiles, and hedgehogs.

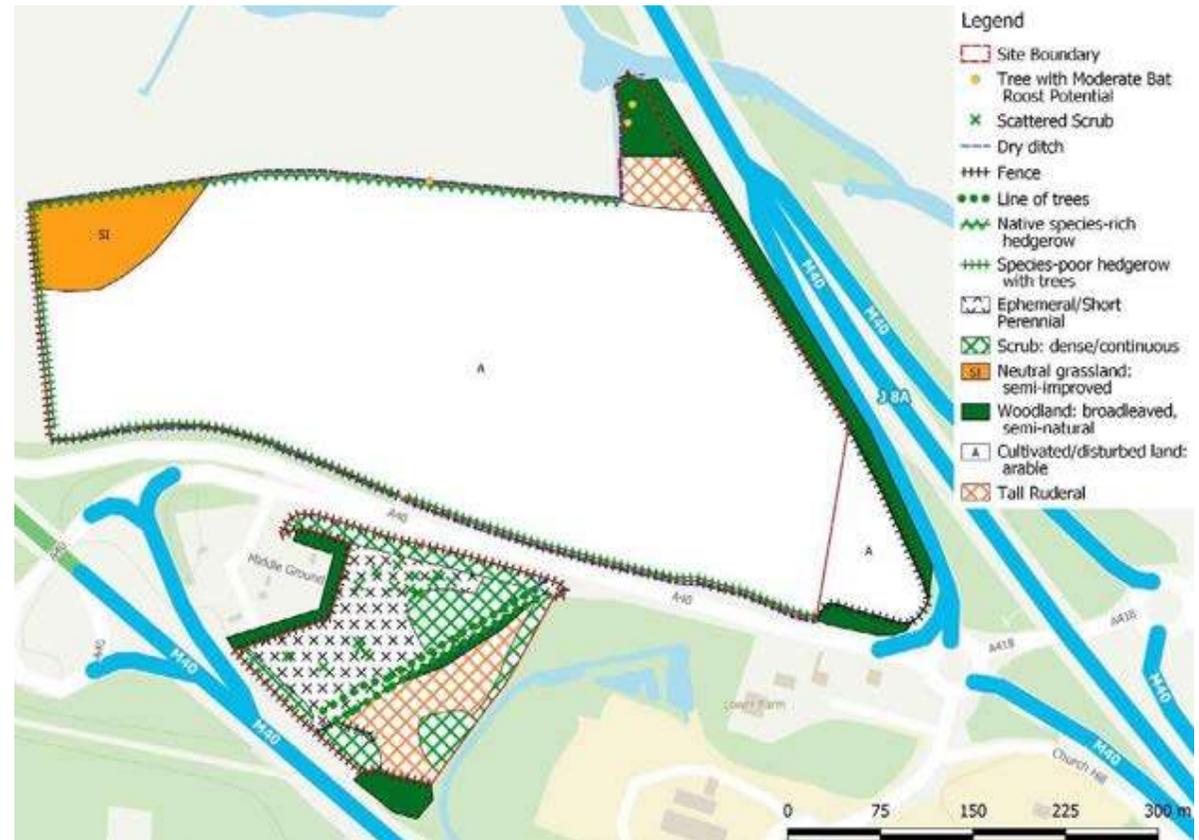


Figure 11



# BUILT ENVIRONMENT

## Historic Environment – Built Heritage

At the site level work undertaken by Cogent Heritage has identified the following heritage assets in proximity to the site:

- o The barn approximately 650 metres west of Lower Farmhouse, a grade II listed mid/late 18th century barn.
- o Wheatley Bridge Farmhouse, a grade II listed Farmhouse.
- o Corner Cottage Wheatley Bridge Farm, a grade II listed house of early-mid 18th century date.

The location of these is shown in Figure 12.

As seen from Figure 12, the heritage assets are separated from the site by the strategic road network. In addition, significant screening through established tree planting limits the visibility between the site and the identified heritage assets.

Cogent Heritage conclude that there is no in principle heritage issues associated with the site.

Looking beyond the site, the development will bring the opportunity to remove HGV vehicles from the historic core of Oxford City will assist in the way that the city centre is experienced.



Figure 12

# HISTORIC ENVIRONMENT

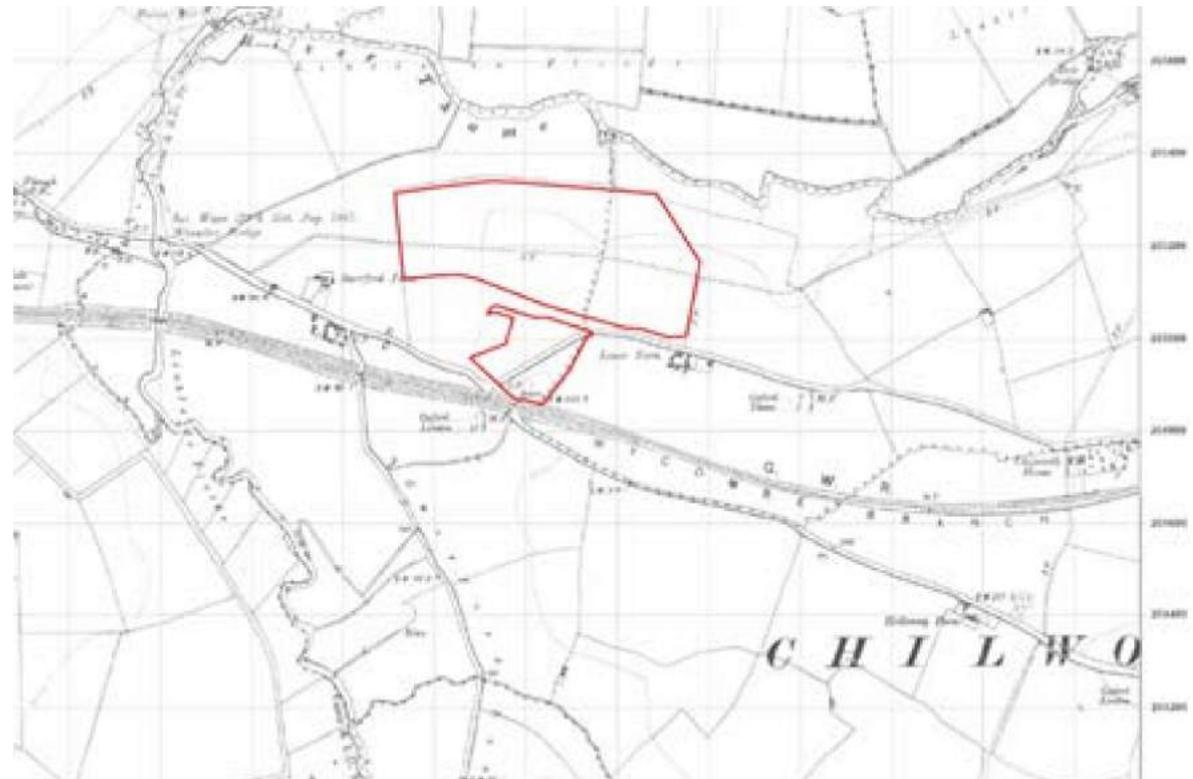
## Historic Environment – Archaeology

Abrams Archaeology has begun to look at the archaeological potential of the site. Previous fieldwork investigations within a 1km boundary of the site (notably during the construction of the M40) has not resulted in significant archaeological findings.

Historic Maps indicate that the site has remained as open undeveloped parkland since at least the late 19th century. The site has been under agricultural use since at the latter part of the 20th century, which can result in some truncation or disturbance of below ground archaeological remains. Despite this, it is considered likely that the site may preserve archaeological remains where they are present. Cropmarks indicative of sub-surface archaeological remains is present in that part of the site which lies north of the A40. These cropmarks are suggestive of:

- o A possible Neolithic monument/s
- o Iron Age/Roman enclosures
- o Medieval ridge and furrow field systems

All of the above suggestions are un-tested by fieldwork and have been made on the basis of LIDAR data, aerial photographs, proximity to the Thame and professional experience. Further on-site work will be undertaken on this.



Map from 1922



# WATER MANAGEMENT

## Natural Environment – Flood Risk and Drainage

The River Thames borders the northeastern part of the northern parcel, and an unnamed watercourse is present to the east of the south of the site.

## Tidal and Fluvial

The Environment Agency (EA) Flood Map for Planning shows that the site is generally located within Flood Zone 1, denoting a low risk of flooding from tidal and fluvial sources. The northeastern and northwestern edges of the Northern site lie within Flood Zones 2 and 3 associated with the River Thames and are therefore considered to be at a medium to high risk of fluvial flooding.

An 8m buffer zone from top of bank to development will be provided around all on-site and adjacent watercourses, in accordance with Lead Local Flood Authority (LLFA) guidance. This will allow access for maintenance following development of the site.

## Surface Water

The EA Risk of Flooding from Surface Water map indicates that the majority of the site is at a very low risk (<0.1% annual probability) of pluvial flooding. There are areas of low (between 0.1% and 1% annual probability), medium (between 3.3% and 1% annual probability) and high risk (>3.3% annual probability) present around the ordinary watercourse along the eastern boundary of the southern site.

A highly sustainable SuDS strategy will be developed as the scheme progresses. This will ensure that flood risk is not increased off-site due to increased surface water runoff. Surface water will be discharged via a combination of infiltration-based SuDS (where feasible) and discharge to the existing on-site watercourses at greenfield runoff rate.

A variety of SuDS features will be incorporated into the proposed development, to ensure that the quality of runoff is controlled alongside the quantity. These could include green roofs, permeable surfacing, filter drains, rain gardens, swales, and ponds. These features will also provide amenity and biodiversity benefits. Rainwater harvesting could also be incorporated to reduce the demand on potable water.



# SUSTAINABILITY

## Sustainability

With the current emphasis placed on energy conservation and the use of LZC (Low or Zero Carbon) technologies, Ptarmigan are keen to be innovative and develop the site in the most sustainable way and contribute more widely to sustainability objectives such as Biodiversity Net gain. In order to deliver an environmentally responsible building, an approach based on low energy design principles is proposed. This involves energy demand minimisation through effective building form and orientation, good envelope design and proficient use of services. Long term energy benefits are best realised by reducing the inherent energy demand of the building in the first instance. Therefore, any future building envelope will be designed to ensure that the fabric and form of the office and employment spaces encompass low energy sustainability principles as follows:

## Air Tightness

In accordance with the requirements of a low energy building, the air tightness characteristics will be addressed. Through robust design and detailing the building will achieve high airtight standards to mitigate air leakage, far in excess of current Building Regulation minimum requirements.

## Natural Daylight/Rooflights

High levels of natural daylight will be provided, wherever possible, through effective window design.

## Lighting Strategy

It is imperative that the lighting design philosophy provides the correct quality of lighting with minimum energy input and hence reduce internal heat gains. Throughout the office, lighting will be appropriately zoned to allow control of luminaries via switches/absence detection and daylight sensors.

## EPC

The applicant will also implement the requirements of the Energy Performance of Buildings Directive and assess the operational energy performance of the building, targeting an 'A' rated Energy Performance Certificate (EPC).

## Solar Generation

An area has been identified on the roof for mounted photovoltaic energy generation panels in order to achieve operational net zero carbon, revised in a NZC study as part of the ambition of the scheme to achieve BREEAM Excellent.

## Water Saving

Any units that are developed will minimise the use of potable water and reuse water where feasible. This will be implemented through the use of water efficient fittings, leak detection and prevention measures and the measuring of water use. The specification of water efficient appliances such as spray taps and low volume WC's will assist. Rainwater harvesting will be implemented, utilising grey water for non-hygine related sanitary functions throughout the building.

## Cycle Store and Showers

To encourage staff to cycle to work, lockable cycle stores and showers are proposed.

## Waste Strategy

Dedicated areas for refuse will be provided to allow for adequate bin storage / compactors to suit the occupier's operations. The refuse area will not exceed 10m from the main footpath and sufficient turning areas will be provided for refuse vehicles.

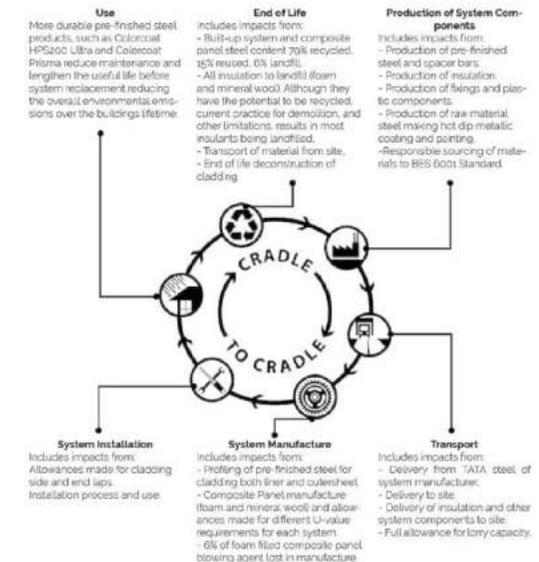
## Waste Management

The proposed development can provide for the careful and sustainable disposal of waste during and post construction. Modern methods of design and construction using pre-fabricated units will help to keep waste arisings to a minimum. Post construction, the buildings will be provided with a dedicated area within the building for the provision of refuse and recycling facilities, tailored to operational requirements with an external waste management platform provided. Consideration has been given to the layout of the development to ensure personal safety. This relates not only to ensuring that the layout of the development does not create an environment conducive to crime, but also to how occupiers and visitors to the site can move freely without risk of injury

## BREEAM

In order to benchmark the environmental performance of any building, Ptarmigan will carry out an assessment against the Building Research Establishment (BRE) Environmental Assessment Method (BREEAM). This is a voluntary scheme that aims to quantify and reduce the environmental burdens of buildings by rewarding those designs that take positive steps to minimise their environmental impacts. Projects are assessed using a system of credits which results in a formal certification giving a rating on a sliding scale. The proposed building will target a BREEAM rating of Excellent.

## Material management

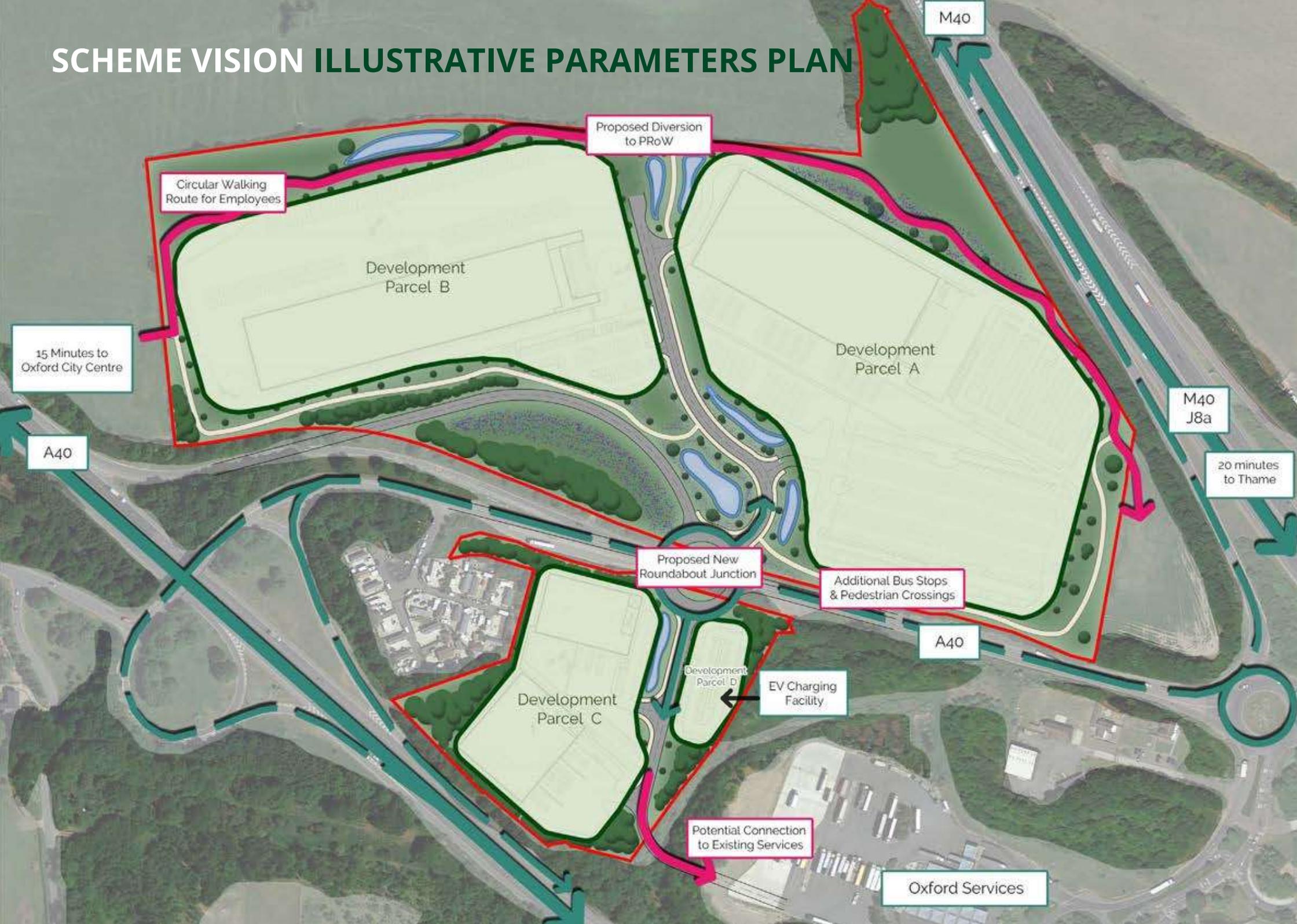


# SCHEME VISION



**PTARMIGAN**

# SCHEME VISION ILLUSTRATIVE PARAMETERS PLAN



Circular Walking Route for Employees

Proposed Diversion to PRow

15 Minutes to Oxford City Centre

A40

Development Parcel B

Development Parcel A

M40

M40 J8a

20 minutes to Thames

Proposed New Roundabout Junction

Additional Bus Stops & Pedestrian Crossings

A40

Development Parcel C

Development Parcel D

EV Charging Facility

Potential Connection to Existing Services

Oxford Services



UMC Architects, Newark Beacon Innovation Centre,  
Cafferata Way, Newark, Nottinghamshire NG24 2TN  
o. +44 (0)1636 653027  
f. +44 (0)1636 653010  
e. [info@umcarchitects.com](mailto:info@umcarchitects.com)  
[www.umcarchitects.com](http://www.umcarchitects.com)



# PTARMIGAN

# Response 13

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email. Please see below and attachment.

Dear Sir / Madam,  
Please find attached representations on behalf of our client Taylor Wimpey. They relate to land at Old London Road, Wheatley (as shown in the site location plan in appendix 1) and are submitted in response to the WNP First Review document.

This email encloses the representations and appendices, and Email 2 (to follow) will include supporting assessments of the site referred to within the representations.

We would appreciate acknowledgement of receipt.

Kind regards

[REDACTED]

Q3. You can upload supporting evidence here.

- File: WNPFRF~2.PDF [REDACTED]

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Wheatley Neighbourhood Plan Review:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

See attachment.

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Planning Director
<b>Organisation (if relevant)</b>	Lichfields
<b>Organisation representing (if relevant)</b>	Taylor Wimpey
<b>Address line 1</b>	Apex Plaza
<b>Address line 2</b>	Forbury Road
<b>Address line 3</b>	-
<b>Postal town</b>	Reading
<b>Postcode</b>	RG1 1AX
<b>Telephone number</b>	-
<b>Email address</b>	██████████@lichfields.uk

Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

████████████████████

South Oxfordshire District Council  
Planning Policy Department  
By email only  
Planning.policy@southandvale.gov.uk

**Date:** 24 February 2023  
**Our ref:** 15470/01/DL/NK/26312151v1  
**Your ref:**

Dear Sir / Madam,

## **Representations to Wheatley Neighbourhood Plan (WNP) First Review consultation, Re Land at Old London Road, Wheatley**

These representation have been prepared by Lichfields on behalf of our client Taylor Wimpey (TW). They relate to land at Old London Road, Wheatley (*the TW site*), as shown in the site location plan in appendix 1) and are submitted in response to the WNP First Review document (hereafter '*WNPFR*').

### **Executive Summary**

The emerging WNPFR and evidence base recognises a need for further housing in Wheatley and the benefits arising from this. This is reflected in the plan which seeks to act as a catalyst for fulfilling current and future housing needs. The SODC Local Plan 2035 provides an opportunity for the WNP to respond to this clear need and identify appropriate locations to meet it. Wheatley is a sustainable and suitable location for further housing development. The TW site has been consistently assessed by SODC, the Neighbourhood Plan process and TW's own due diligence process as forming an appropriate location for c. 80 private and affordable dwellings.

TW are concerned that in its' current form the WNPFR does not seek to provide the necessary level of housing and adopts a simplistic approach of revisiting earlier (and now dated) proposals instead of revisiting matters afresh.

Furthermore TW consider that the approach, and underlying evidence base of the WNPFR, conflict with the Basic Conditions required of neighbourhood plans, as the plan would create impermanent Green Belt Boundaries, which is contrary to the objectives of the NPPF. For these reasons TW request that the emerging WNPFR is revisited to include the deletion of TWs site from the GB and allocation for housing.

## **Background**

Lichfields have submitted representations in respect of the TW site, on their behalf, to earlier consultations including those relating to the SODC 2035 Local Plan and the original WNP. More recently we have submitted a response to the SODC “*Call for Land and Buildings Available for Change*” consultation in 2021 (which will inform the emerging SODC and VOWH joint Local Plan 2041) and the regulation 14 consultation document proceeding the current WNPFR consultation document.

Through this process TW has completed a number of detailed technical assessments and preliminary design analysis which were contained in our client’s response to the “*Call for Land and Buildings consultation*” (2021). The preliminary design analysis is appended to these representations at appendix 2 and additionally we attach further technical assessment to these representations.

As expanded upon below the TW site has been assessed by both SODC and Wheatley Parish Council through the progression of recent and ongoing development plan preparation.

## **Taylor Wimpey**

Taylor Wimpey is a national developer with a successful track record of building high-quality new homes across the county, including a predominantly affordable homes development on land north of London Road, Wheatley. TW is committed to adopting sustainable practices to provide places to live with appropriate facilities, an attractive environment and a sense of place.

Moreover, they seek to add social, economic and environmental value to the wider communities in which they operate. This includes working with local people, community groups and local authorities and keeping them informed about works, both before construction and throughout the life of the development. Getting the basics of homebuilding right first time, such as quality, customer service and health and safety are key priorities of TW.

They work with selected subcontractors and use carefully sourced materials to make sure that their homes are built safely, efficiently and cost-effectively and have as little effect as possible on the environment.

## **Scope of representations**

The current consultation requests comments on the WNPFR. These representations therefore address the following key areas:

- The background to Green Belt release in the WNP (section 1)
- The emerging local planning policy context (section 2)
- The profile of Wheatley as a sustainable “Larger Village” (section 3)
- Overview of previous assessments of the TW site (Section 4)
- The opportunity provided by the TW site for residential development (Section 5)
- Review of the Strategic Environmental Assessment (SEA) accompanying the WNPFR (Section 6)

## 1. Green Belt Release and Exceptional Circumstances

Our client supports the Vision set out by the WNPFR to “*deliver a neighbourhood plan that would revitalise the villages of Wheatley and Holton and thereby act as a catalyst for fulfilling current and future housing needs*” (page 25). These representations set out the opportunity that the TW site provides to realise this vision, through the allocation of sites to provide additional housing to ensure the emerging WNPFR can both meet future housing need and define Green Belt boundaries of long-term permanence.

The submission version of the WNP (2019) was ‘made’ in 2021 following a number of recommendations by the Independent Examiner. He recommended that policy GBBA1 relating to amendments to the Green Belt boundary be deleted due to potential conflict with the (then) emerging South Oxfordshire District Council (SODC) Local Plan (2035) at that time. This was effectively because the WNP had ‘moved ahead’ of the Local Plan, and the matter of Green Belt release and the exceptional circumstances required to justify it were strategic matters to be dealt with in the SODC LP 2035.

The Local Plan 2035 has subsequently been adopted and state (para 3.118) that SODC is “*committed to supporting Wheatley and their ambitions for their Neighbourhood Development Plan. Within two years of the adoption of the Local Plan, the Wheatley Neighbourhood Plan will release land from the Green Belt, to enable the allocation of land for mixed use development*”

It goes on to state (para 3.120) that the exceptional circumstances for the NDP to release Green Belt land are as follows:

- to support the Neighbourhood Development Plan and to ensure that future allocations can be made through the NDP; and
- Wheatley is a Larger Village and benefits from a number of services and facilities and represents an appropriate location for accommodating additional development

The SODC Local plan therefore provides the WNPFR with the opportunity to undertake detailed amendments to the Green Belt boundary. It imposes no parameters on the choice of appropriate sites to be released from the Green Belt or the quantum of development enabled.

TW are concerned that the WNPFR represents a missed opportunity at it simply proposes the reinstatement of the Green Belt sites previously proposed for deletion within the originally submitted WNP. Emerging policies SPES1, SPES2 and SPES3 seek to release land from the Green Belt for a total of approximately 80 new homes at sites WHE16, WHE22 and WHE15 respectively (excluding those at Wheatley Campus which already benefit from planning permission).

TW consider that WNPFR should instead consider **all** available options for achieving its Vision of meeting current and future housing need. They note that the SODC Local Plan doesn’t include a cap on the extent of housing proposed or land released through these provisions. In these circumstances the WNPFR should undertake an updated assessment not simply default to the approach of the original WNP submission version which enables only a modest allocation of homes.

The consideration of a wider range of options would provide a greater prospect that Green Belt boundaries will remain permanent in accordance with NPPF requirements. Allocation of additional housing land would also assist in maintaining sufficient housing supply, and reduce the prospect the

WNP is considered “*out of date*” (NPPF, paragraph 11) in future decision making if it does not meet identified housing requirements.

## **2. Emerging local planning policy context**

The WNPFR is being prepared in a local and wider planning policy context which has undergone significant change since the made WNP (2021). This includes the progression, and then abandonment of the Oxfordshire 2050 plan, and the emergence of the joint SODC and VOWH Local Plan 2041.

Prior to cessation of work on the Oxfordshire 2050 plan, the Regulation 18(2) Policy Options Consultation identified five proposed Spatial Strategy options. The responses to this consultation identified significant support for the “*Transformational*” growth option which included the most ambitious housing target, highlighting the significance of the housing need across the region. The Oxfordshire 2050 plan was explicitly considering the issue of Green Belt release to meet housing need, making clear that some of the proposed Spatial Strategy options would have “*require demonstration of 'exceptional circumstances', and subsequent Green Belt review*”.

Following abandonment of the Oxfordshire Plan, the Oxfordshire Local Authorities have made clear that “*local Plans for the City and Districts will now provide the framework for the long term planning of Oxfordshire...and that issues of housing needs will now be addressed through individual Local Plans for each of the City and Districts*” (Joint statement from participating LPA’s, 3/08/22).

SODC undertook an “*Issues consultation*” as part of their emerging Joint Local Plan (JLP) in May 2022 and the results of this consultation were published in February 2023. Within these results, it was proposed to “*address the matters of housing requirements and Green Belt through future engagement on the Joint Local Plan*” (Issues Consultation Results, page 29).

SODC (and VOWH) are currently undertaking further evidence base studies, and it is expected a joint Green Belt review will be necessary, seeking opportunities to consider locations to accommodate future housing need. SODC proposes to undertake a subsequent Preferred Options consultation (Regulation 18) in Summer 2023, consultation on the draft plan (Regulation 19) in Summer 2024 and adoption of the plan in late 2025.

It is therefore clear that that the joint Local Plan is likely to be adopted after the WNPFR might be “*made*”. If the WNPFR simply reinstates the previously deleted provisions from the submission version of the WNP, and does not undertake a fresh Green Belt assessment, there is a real likelihood the WNPFR, and the amended Green Belt boundaries it creates, will be superseded by the joint Local Plan in the near future. This would be inconsistent the NPPF’s emphasis that in defining Green Belt boundaries plans should:

- “be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period” (NPPF paragraph 143e)
- “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” (NPPF para 143f) and
- “have regard to their intended permanence in the long term, so they can endure beyond the plan period” (NPPF paragraph 140).

It is our client's contention that the WNPFR should not simply default to the (now dated) approach of the WNP submission version which considers only a modest allocation of homes on Green Belt land, and that this risks being particularly short sighted in light of the emerging policy context outlined.

Wheatley is recognised as having strong sustainability credentials forming an appropriate location for additional development, and land at Old London Road would provide an excellent opportunity to meeting future housing need, in a sustainable location.

TW therefore consider that the WNPFR's approach to Green Belt release will not meet the Basic Conditions required of Neighbourhood Plans<sup>1</sup>. These (para 8(2)) require a draft neighbourhood order to have "*regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order*".

As identified, an important objective of national policy that Green Belt boundaries have permanence in the long term (NPPF para 140). The WNPFR's approach of proposing allocation of only 80 dwellings, without undertaking a wider Green Belt assessment would fail to create Green Belt boundaries of permanence given the prospect they will need to be superseded by the joint Local Plan in the near future. Whilst the submitted Basic Conditions Statement (2022) considers policy GBBA1 against national policies in paragraphs 3.16-3.19, it fails to identify this conflict with national policy. On this basis, it is our client's contention that the WNPFR does not have sufficient regard to national policies, and therefore fails to meet the Basic Conditions set by the Planning and Compulsory Purchase Act 2004.

### **3. Wheatley as a sustainable "larger village"**

Wheatley is a defined 'Larger Village' in the SODC 2035 Local Plan. The Glossary in the plan (p248) provides the following definition of a 'Larger Village':

*"Larger Villages are defined as settlements with a more limited range of employment, services and facilities, where unallocated development will be limited to providing for local needs and to support employment, services and facilities within local communities"*

The SODC Sustainability Appraisal<sup>2</sup> (2018) identifies the strong sustainability credentials of Wheatley stating that "*Wheatley is identified as a larger village in the settlement hierarchy with a variety of services including primary and secondary schools, GP surgery, dentist, post office and supermarket*".

We note that WNPFR<sup>14</sup> also identifies a number of characteristics and sustainability credentials of the settlement, including:

- Wheatley is a "*major hub*" serving surrounding villages in retail, light industry, education and medical practice and is described in LP2033 [3] as a Local Service Area (Para 4.1)

---

<sup>1</sup> Neighbourhood Plans are required to meet Basic Conditions by paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

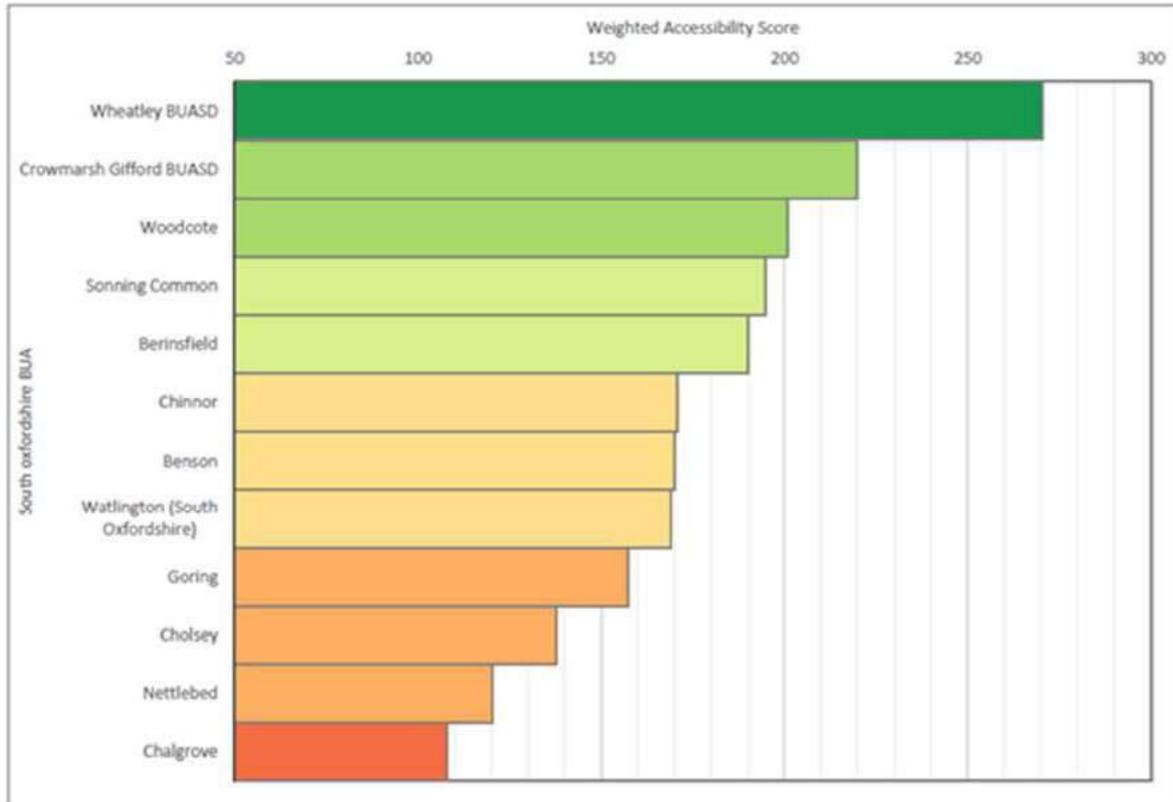
<sup>2</sup> [dynamic.serve.jsp \(southoxon.gov.uk\)](https://dynamic.serve.jsp(southoxon.gov.uk))

- Wheatley has access to London and Oxford, access to three railway stations by bus, the village facilities including schools and surgery, its community spirit, a wide range of organisations and the setting and history of the village (para 4.7)
- The GP and district nursing services are based at Morland House (Para 4.9).
- Unusually for Oxfordshire villages, Wheatley and Holton between them have the full range of state schools: Wheatley Primary Academy and Wheatley Park Academy (run by different trusts) and a special school (John Watson) with junior and senior levels. These schools also serve other villages and the nearby suburbs of Oxford City (Para 4.10)
- Wheatley Park’s “*greatest concern is the problem of staff recruitment due to the cost of housing*” (Para 4.11).
- There is a light industry park which includes four plant and building materials suppliers together with a garage business and also there is a business park (Wheatley Business Centre). Four car workshops are sited at Littleworth (Para 4.17).
- The operational bus services are as follows:-
  - i 275 to Oxford - High Wycombe
  - ii 280 to Oxford – Aylesbury
  - iii 46 to Wheatley Asda – Horspath – Cowley

### **Accessibility relative to other large villages**

In addition to the above, TW have previously commissioned Calibro consultants to assess the accessibility of Wheatley relative to the other large villages in SODC, and this assessment accompanies these representations. This assesses accessibility by regard to a number of criteria and concludes that Wheatley is not only a suitable settlement for residential development but is the most sustainable location for such development (Para 2.11, and figure 2.1 extract below). This is entirely consistent with the analysis within the SODC Sustainability Appraisal (2018) and the WNPFR.

Figure 2-1 Updated Sustainability Appraisal - Model Results



#### 4. Previous assessments of the TW site

As noted above the TW site has been favourably considered as a potential development location within earlier development plan evidence base documents.

##### SHELAA (2019)

The South Oxfordshire SHELAA (2019) assessed the TW site (ref: 954) and identified that it has a residential capacity of 92.6 dwellings. It also notes that 11% of the TW site is within Flood Zones 2 and 3 and that 100 per cent of the TW site is within Green Belt. It adds there are no heritage assets, that the TW site is available for development, suitable for further consideration and achievable concluding in a positive assessment in the SHELAA. However the SODC Strategic Site Selection Background Paper Part 1 (2019) confirms on page 39, that the TW site was discounted at Stage 2 (initial site assessment) alongside many other sites as the “*capacity is less than threshold of 500*”. This arbitrary threshold is not relevant to the WNPFR assessment.

## **Green Belt Assessment**

The Local Green Belt Study for SODC: Final Report (2015) states that a number of sites could be removed from the Green Belt, including all of the TW site (identified as land at Old London Road, Wheatley (ref. Area 8)). The analysis noted:

*“The boundaries of [area] 7 and 8 are formed by adjacent roads and built form and adjacent tree belts. The eastern boundary of Area 8 follows strong hedgerow”.* Later in the document the TW site was noted as the location of *“Areas that reflect few functions of the Green Belt”* (Page 87, figure 5)

Additionally, the site assessment work provided in the made WNP (2021) highlights the TW site’s favourable assessment in the Neighbourhood Plan process. The made WNP highlights a screening exercise was undertaken by the WNP Committee within the *“Site selection”* (WNP, Appendix 2) process. Land at London Road, Wheatley (ref. WHE2) was taken forward to the next stage of site assessment on the basis that it was one of 5 sites that the SODC Local Green Belt Study (2015) considered could be a potential site to be removed from the Green Belt. However, the TW site was not recommended for allocation as the Site Assessment (para 2.23) concluded *“...better alternatives exist, although there may be a case for the WPC to consider approaching the landowner for permission to use part (0.3 HA) of the S half of WHE2 as burial space still subject to suitable access being delivered together with improvements for pedestrians on the Old London Road”.* This highlights the recognition of the TW site’s potential to accommodate development.

TW commissioned the Environmental Dimension Partnership (EDP) to undertake a Preliminary Landscape Appraisal and Green Belt review of the TW site (again identified as WHE 2) and the three other (undeveloped) sites suggested for Green Belt release within the Local Green Belt Study. This appraisal has been submitted in previous representations most recently the *“Call for Land and Buildings consultation”* (2021) and accompanies these representations for ease of reference.

We do not seek to repeat EDP’s analysis in full but in summary the review concludes that our clients site makes a predominantly limited contribution to the purposes of the Green Belt, being entirely divorced from the wider designation by a recognised, permanent boundary to the north (the A40) and by an existing, recognisable landscape feature to the east. The existing settlement at Wheatley provides a permanent boundary to the south and west. Urbanising features include the existing settlement edge on two boundaries, overhead services and the A40 which also contribute to a substantial reduction in the sense of openness, when compared to the wider Green Belt.

Our clients contend that the WNPFR should seek the opportunity of a comprehensive approach to considering housing need and Green Belt release and it is clear the TW site makes a limited contribution to the function of the Green Belt in comparison to other alternatives within Wheatley.

## **5. The opportunity provided by land at Old London Road, Wheatley**

The WNP outlines a number of characteristics of housing in the village, and future aspirations of the community, with reference to the Community Survey (2016):

- *“Appetite for downsizing (26%)*
- *Lack of affordable housing is a major reason given for leaving the village (36% of leavers)*

- *Strong support for affordable housing (63%), starter homes (53%) and supported housing (47%, with preference towards independent accommodation with care)*
- *Strong support for owner occupied/shared ownership properties; home ownership is preferred among families/individuals wishing to move within the next 5 years (80%)*
- *There is demand for housing from households living outside Wheatley; the greatest demand is for 2- and 3-bedroom properties” (WNPR14, figure 5.1m page 24)*

The TW site provides the opportunity to add to the mix of housing in the village including affordable housing, in a sustainable location, contribution to meeting many of the aspirations outlined above, and the overall vision of the WNPFPR of *“fulfilling current and future housing needs”*.

Furthermore TW have undertaken both a detailed design assessment of the scope for residential development on the site and have also assessed potential transport, ecological, noise, and arboricultural issues. This work is summarised below (with the indicative scheme attached at Appendix 2), and the relevant reports attached to this submission.

### **Transport**

An access feasibility report has been prepared by WYG which considers both the feasibility of access to the site and any cumulative impacts of development traffic on the local highway network having regard to the proposed allocation of the Oxford Brookes Wheatley Campus site.

The report concludes that vehicular access to the TW site is recommended via the provision of a simple priority T-junction on Old London Road. The report considers that this access would meet appropriate design standards to cater for the scale and type of development proposed and that the junction would operate within theoretical capacity in future years.

It also suggested measures to enhance the pedestrian and cycle accessibility of the TW site and these have been incorporated within the proposed masterplan.

### **Noise**

An assessment of noise for the TW site has been carried out by Auricl to inform the illustrative Masterplan and assess any potential impacts of noise on future development of the site. This assesses daytime and night-time noise levels affecting the proposed development site.

It concludes that, even for the worst-case facades at the noisiest site boundary, acceptable noise levels can be achieved within the proposed dwellings.

### **Ecology**

Initial baseline studies have been undertaken for the site by EDP. These have confirmed that the TW site is not subject to any “in principle” ecological constraints, and offers sufficient flexibility to ensure compliance with paragraph 175 of the NPPF through the avoidance of ‘significant harm’ to biodiversity. Furthermore, an appropriately designed development incorporating appropriate mitigation and enhancement, has the potential to ensure no net loss, and possibly a net gain, to biodiversity.

On this basis, EDP finds that by virtue of the relatively limited constraint posed by the site's habitats and protected species interest, the scheme is capable of compliance with relevant planning policy for the conservation of the natural environment at all levels.

### **Arboriculture**

An arboricultural survey has been undertaken by EDP. As part of the review of local designations, this found that the trees at the TW site are not subject to any TPO, and the site does not fall within or abut a Conservation Area.

Overall, the TW site contains two category A trees of high quality and value and five category B items, of moderate quality and value.

All of the surveyed items are located around the perimeter of the TW site and, providing that designated RPAs and canopies are respected, they do not adversely constrain the potential to accommodate residential development in the main body of the TW site.

### **Indicative Masterplan**

All of this analysis has fed into the illustrative masterplan which has been prepared which is informed by the site's constraints and opportunities (see appendix 2). The masterplan is illustrative and provides the opportunity for further development alongside the design code proposed in the WNPR14.

The illustrative plan proposes a central development area framed, and visually contained, by woodland and open space. This results in a development of up to 80 new homes with a mix of housing sizes across a range of tenures. The plans also include a 15m tree planting area on the eastern boundary and the identification of a zone where housing will not exceed 2 storeys.

The principal access to the development area will be from Old London Road to the centre of the TW site, framed by retained woodland, with additional footpath connections to the northern and southern corners.

Upon entering the TW site, the development will overlook a wide area of open space which protects the setting of existing trees and could also accommodate drainage and open space. Landscape corridors to the north and south also protect the planting along the site's boundaries and provide a framework for amenity open space. To the west and adjacent to the A40, the landscape buffer can accommodate new woodland planting and noise mitigation measures such as a bund and or fencing whilst a new plant zone is provided to the east. A continuous built edge adjacent to the A40 buffer will help further mitigate traffic noise and protect the amenity or gardens and habitable rooms within the development.

Furthermore, the detailed analysis and design work undertaken by TW confirms that the TW site is free from constraints, available, achievable and can come forward for residential development within the next 5 years.

## **6. Review of the Strategic Environmental Assessment accompanying the WNPR**

The WNPR is accompanied by an SEA Environmental Report (June 2022) which seeks to identify, describe and evaluate the likely significant effects of implementing the plan, and identify reasonable

alternatives. The report considers differing site options within subheadings of ‘Littleworth industrial area’, ‘Green Belt sites’ and ‘Other site options’. As part of the assessment of Green Belt sites, two sites were assessed in detail in the SEA, which were those identified in the South Oxfordshire Green Belt Study (2015) as “*reflecting few functions of the Green Belt*” (figure 5.2). The TW site is one of the two Green Belt sites assessed.

The TW site is considered in the SEA under reference ‘Green Belt parcel 8’ and assessed against ‘Green Belt Parcel 9’ as a reasonable alternative for housing growth.

### Reasonable alternatives for housing growth

Prior to the detailed assessment of Green Belt Parcels (GBP) 8 and 9, the SEA identifies two ‘reasonable alternatives for Housing Growth’ as set out in table 5.1 as below.

*Table 5.1 The reasonable alternatives*

			Option 1	Option 2
Completions and commitments*			175	
OBU Wheatley Campus		Housing	500	
Allocations	West of Asda	Housing		
	Green Belt Parcel 8		~35	0
	Green Belt Parcel 9 (northern part)	Mixed use	0	55
<b>Total homes (net increase) 2011 - 2033</b>			<b>710</b>	<b>730</b>

\*1<sup>st</sup> April 2021

In relation to these options, it outlines

*“these are considered to be the ‘reasonable’ alternatives in that they are underpinned by a sound understanding of strategic (‘top down’) and site specific (‘bottom-up’) issues and opportunities, and also on the basis that they are suitably wide ranging and distinct. ‘Unreasonable’ options not examined further include:*

*Lower growth - a marginally lower growth approach might feasibly be examined involving non-allocation of the ‘West of Asda, South of London Road’ site; however, on balance it is considered appropriate to hold allocation of this site ‘constant’ across the scenarios. This is a small site associated with limited strategic issues/impacts.*

*Higher growth - a large scheme involving allocation of both Green Belt Parcels would involve an unreasonably high quantum of housing growth, and it is not thought that there is a need / demand for expansion of the employment land offer, of this scale” (SEA Environment Report 2022, page 10)*

It is considered that the ‘higher growth’ alternative is dismissed as being “*unreasonably high*” without sufficient or reasoned justification.

The combined housing capacity of both GBP's is circa 160 dwellings, which would represent 9% of the total number of houses in Wheatley (1771 as of para 4.6 of the WNPFR). As has been noted, the site lies within a Larger Village which has strong sustainability credentials and is therefore well placed to accommodate housing growth. The SODC LP 2035 sets out the exceptional circumstances for the WNP to release land from the Green Belt, and sets no cap to the housing growth which could be sought by the WNP. The central vision of the WNPFR is to fulfil current and future housing needs, and the WNPFR is underpinned by a housing needs assessment from 2019, which has not been updated since the original WNP submission version. A review of the emerging JLP context suggests further Green Belt release will be necessary to accommodate housing growth within SODC. The suggestion that the Higher Growth scenario would involve an unreasonably high quantum of housing growth is unqualified.

It is also inconsistent with the planning policy designation of Wheatley as a Larger Village, where there are exceptional circumstances to release Green Belt land, and the emerging planning policy context of the JLP. Dismissing the higher growth alternative without further assessment also serves to inhibit the achievement of the central vision of the WNPFR, to fulfil current and future housing needs.

## SEA assessment of alternatives Green Belt Parcel 8 (*the TW site*)

Table 6.1 (extract below) of the SEA Environmental report compares the performance of GBP 8 (*the TW site*) with GBP 9, and provides follow up commentary of the scoring.

Table 6.1 Alternatives assessment findings

Topic	Rank of performance/ categorisation of effects	
	Option 1 GB Parcel 8	Option 2 GB Parcel 9
Air quality	2	★
Biodiversity	=	=
Climate change	=	=
Community wellbeing	2	★
Historic environment	=	=
Landscape	=	=
Land, soil & water resources	=	=
Transportation	=	=

<sup>7</sup> Red indicates a significant negative effect; and green a significant positive effect

In relation to the scoring commentary provided within the SEA, we would make the following comments:

- Air Quality - GBP 8 is considered by the SEA to perform “*relatively poorly due to its proximity to the A40*”, with it being “*considered likely that residents of any scheme on this site would be subject to some degree of noise and potentially air pollution from the road*” (SEA Environment Report 2022, page 12). It is unclear the extent to which the SEA’s assessment considers the constraints plan and concept masterplan submitted with previous representations by TW to date (appendix 2), which shows that development can be accommodated without being adversely impact by noise pollution. Given the SEA makes clear in relation to air quality for GBP 8 that “*it is not considered to be a major issue, with no Air Quality Management Area (AQMA) designated locally*”, the lower score of GBP 8 is not justified. For these reasons we consider GBP8 and GBP9 should be equally scored.
- Biodiversity - GBP 9 is considered by the SEA to be more sensitive than GBP 8, however both GBP’s are scored equally for Biodiversity on the basis of a proposal to enhance the proximity of GBP9 through a proposed Green Corridor. GBP9 should not be scored higher on the basis of a hypothetical, given the ability of GBP 8 to also contribute to a potential Green Route should it be developed. On this basis, if GBP9 is considered to be more ecologically sensitive, it follows that GBP 8 should be scored higher than GBP 9.
- Community and wellbeing – GBP9 is considered to deliver “*on the objective of village rationalisation*”. This objective is not identified as such within the WNPFR. The SEA contends that “*development at GB Parcel 9 would also contribute significantly to the ambition of delivering a new green corridor (Green Route), through Wheatley*” (SEA Environment Report 2022, page 12). It has not been evidenced that GBP 8 could not contribute equally to a green corridor, and this is not considered to be a reason for attributing significant beneficial scoring to GBP 9. The SEA acknowledges that “*GB Parcel 9 has been identified as more suitable than GB Parcel 8 (when judged against criteria covering matters including access and setting); however, this is highly uncertain*”. Given this acknowledged uncertainty, it is considered the “*significant positive effect*” attributed to GBP9 is not justified. Additionally, the SEA suggests “*there is a need to consider local housing needs, and highlight the merit of Option 2 in delivering higher growth*” (SEA Environment Report 2022, page 12). Attributing merit to GBP 9 over GBP 8 for its perceived ability to deliver higher growth is perverse when both sites are available for development and both could be allocated for development to deliver higher growth, if this is considered meritorious. Additionally, the acceptance that delivering higher growth is meritorious entirely contradicts the SEA’s earlier contention that a higher growth scenario would lead to an unreasonable high quantum of housing growth. For these reasons we consider GBP8 and GBP9 should be equally scored.
- Landscape – the SEA states “*Parcel 8 could well be the more sensitive site, from a Green Belt perspective, recognising that the new Green Belt boundary would be relatively weak (at the site’s eastern extent); however, there is not firm evidence upon which to reach a conclusion*”. Our clients would dispute the contention that the TW site would provide a relatively weak Green Belt boundary, and that there is no evidence to reach a conclusion. The EDP Preliminary Landscape Appraisal and Green Belt review submitted with previous representations states that “*the removal of the promotion site will still retain clearly defensible boundaries, die[sic] to the strong boundary vegetation enclosing the promotion site, and particularly on the eastern boundary*” (EDP, page 10).

In summary TW do not agree that GBP 9 should be scored above GBP 8. More thorough assessment is required, which at the very least considers the evidence base studies submitted with these (and previous) representations to promote the TW site.

TW also contend that allocation of both GBP's for development would provide a better basis for meeting current and future housing need, more consistent with the vision of WNPFR.

## **Parish response to alternatives**

Following the scoring of the sites, section 7 of the SEA outlines the Parish Council's response to the alternatives assessment and the reasons for supporting the preferred approach in light of alternatives. The Parish Council outline response is as follows:

*“Option 2 is the preferred option, in accordance with the alternatives assessment findings. Option 2 is found to perform well in terms of a number of objectives, in particular the socio-economic objectives, given the potential to deliver upon the objective of village ‘rationalisation’.*

*With regards to Option 1, the assessment shows this option to perform poorly. It is also noted that the assumption underpinning the assessment - namely that the site would be made available for mixed use development, thereby enabling employment uses lost through the redevelopment of Littleworth Industrial Estate to be relocated - may well not hold true”. (SEA Environment Report 2022, page 14)*

We have identified TW's view that Option 2 (GBP 9) should not be considered preferential over Option 1 (GBP8). We have also identified the positive effects of considering allocation of both to meeting current and future housing needs, and the consistency of this with the existing and emerging local planning policy context.

## **Conclusion**

The WNPFR provides a rare opportunity for the neighbourhood plan group to make detailed amendments to the Green Belt boundary. TW supports the WNPFR vision of “*fulfilling current and future housing needs*” but contends that to achieve this vision the WNPFR should undertake a fresh and comprehensive Green Belt assessment and consider further options of Green Belt release including the TW site. This will provide a better prospect of fulfilling housing need given the wider planning policy context outlined above, and provide greater prospects that Green Belt boundaries will be permanent and long term as required by national policy. We have outlined that the current approach of the WNPFR to Green Belt release would lead to Green Belt boundaries which are impermanent. This reflects an inadequate regard to the emphasise of national policies and advice on defining Green Belt boundaries, and a failure of the WNPFR to meet the Basic Conditions required of neighbourhood plans as required by paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990.

These representations have highlighted, drawing on both the evidence base prepared to inform earlier development plans, and our client's own analysis, that the TW site makes a limited contribution to the function of the Green Belt, and is suitable and available as a sustainable site to meet housing need in Wheatley, through allocation in the WNP. We have identified concerns with the assessment of the site through the SEA, and suggest a more thorough assessment should be undertaken. Initial analysis suggests the site should be considered suitable for allocation, and that there is no reason that it could not be added to the sites proposed for allocation in the WNPFR.

We trust these representations assist consideration of the WNPRFR, and we look forward to further opportunities to discuss the valuable opportunity the TW site presents for development.

For the reasons set out we suggest that the WNPRFR is examined by way of public hearing, where we would request the opportunity to make further representations.

Please contact [REDACTED] or I if you have any queries or require any further information in the meantime.

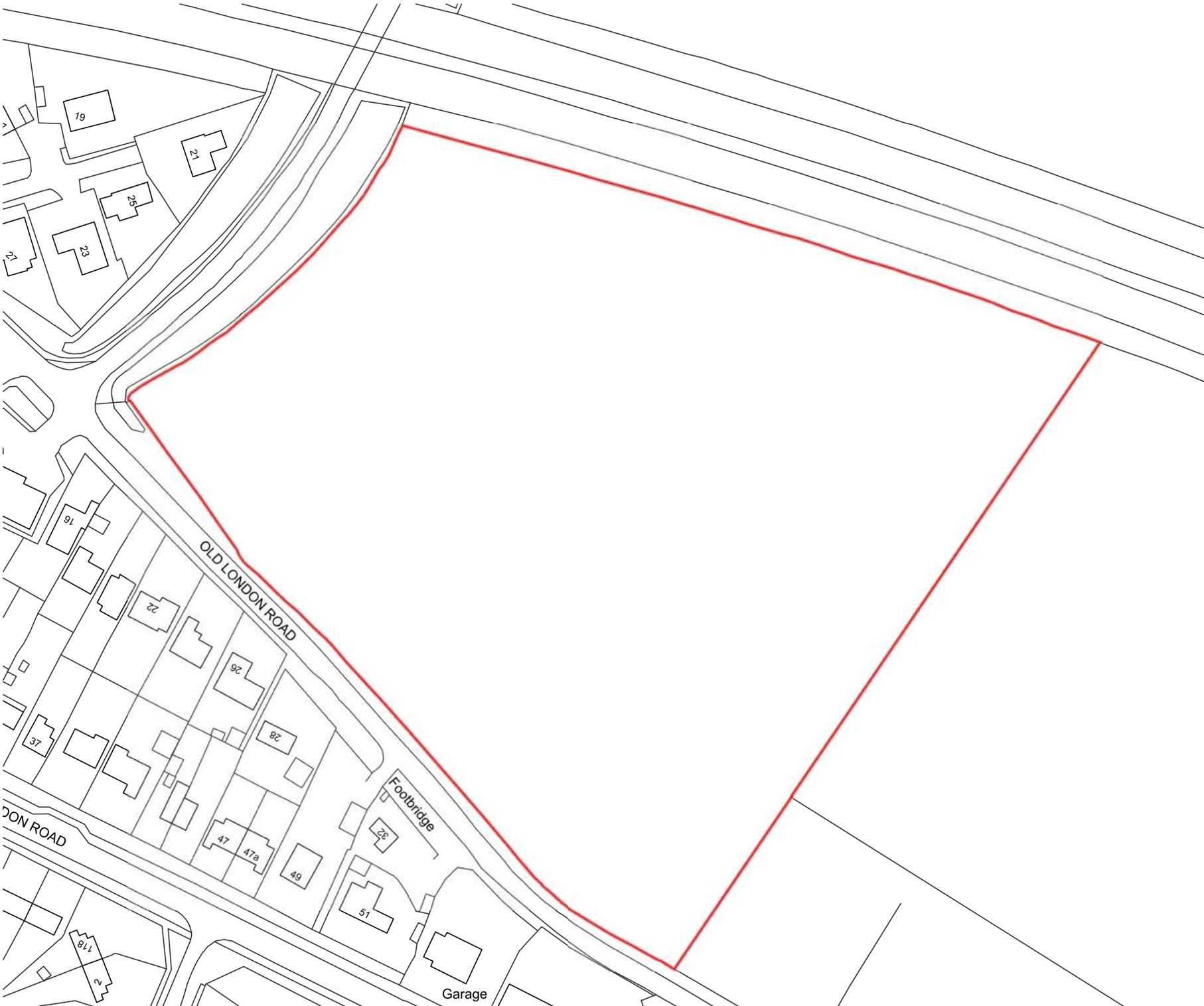
Yours sincerely

[REDACTED]

Senior Director



## **Annex 1: Site Location Plan**



**Key**

Site Boundary



Project	Land at Old London Road, Wheatley		
Title	<b>Site Location</b>		
Client	Taylor Wimpey UK Ltd.		
Date	15.02.2017		
Scale	1: 1000 @A3		
Drawn by	PC		
Dwg. No	15470 02 001	Rev	A



## **Annex 2: Constraints and opportunities plans and indicative masterplan**



- Key**
- Site boundary (3.43 ha) 
  - Developable area (1.87 ha) 
  - Area of potential higher density 
  - Area of continuous built edge 
  - Area of 2 storey height limit 
  - Open space 
  - Road network 
  - Trees / new planting 
  - Views 



# LICHFIELDS

Project	Land at Old London Road, Wheatley
Title	Concept Masterplan
Client	Taylor Wimpey UK Ltd.
Date	29.06.17
Scale	1:1000 @ A3
Drawn by	PC
Drg. No.	IL15470/02-003 revE

Based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office. © Crown Copyright reserved. Licence number ALS0684A LP/CL15470/02



- Key**
- Site boundary 
  - Trees (Category A) 
  - Trees (Category B) 
  - Trees (Category C) 
  - Linear open space 
  - Contours 
  - Views from site 
  - Potential access 
  - Enhanced woodland buffer 
  - Pedestrian access 



# LICHFIELDS

Project	Land at Old London Road, Wheatley
Title	<b>Opportunities</b>
Client	Taylor Wimpey UK Ltd.
Date	30.06.17
Scale	1:1000 @ A3
Drawn by	PC
Drg. No.	IL15470/02-004 revC





- Key**
- Site boundary 
  - Trees (Category A) 
  - Trees (Category B) 
  - Trees (Category C) 
  - Tree / boundary buffer 20m 
  - Contours 
  - Drainage ditch 
  - Steep slope (bank) 
  - Power lines 
  - Noise (A40) 
  - Daytime LAeq noise contour - 68+ dB(A) 



# LICHFIELDS

Project	Land at Old London Road, Wheatley
Title	<b>Constraints</b>
Client	Taylor Wimpey UK Ltd.
Date	30.06.17
Scale	1:1000 @ A3
Drawn by	PC
Drg. No.	IL15470/02-002 revD



# Response 14

## Respondent Details

[REDACTED]

[REDACTED]	[REDACTED]

Q1. Are you completing this form as an:

Agent

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Response received via email. Please see attachments.

Q3. You can upload supporting evidence here.

- File: 13340~1.PDF - [REDACTED]
- File: 170515~1.PDF - [REDACTED]
- File: C\_EDP4~1.PDF - [REDACTED]
- File: PDF\_L ~1.PDF - [REDACTED]
- File: T\_EDP4~1.PDF - [REDACTED]

## Public examination

Q6. Most neighbourhood plans are examined without the need for a public hearing. If you think the neighbourhood plan requires a public hearing, you can state this below, but the examiner will make the final decision. Please indicate below whether you think there should be a public hearing on the Wheatley Neighbourhood Plan Review:

Yes, I request a public examination

## Public examination

Q7. Please state your specific reasons for requesting a public hearing below:

See attachments.

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Title</b>	-
<b>Name</b>	██████████
<b>Job title (if relevant)</b>	Planning Director
<b>Organisation (if relevant)</b>	Lichfields
<b>Organisation representing (if relevant)</b>	Taylor Wimpey
<b>Address line 1</b>	Apex Plaza
<b>Address line 2</b>	Forbury Road
<b>Address line 3</b>	-
<b>Postal town</b>	Reading
<b>Postcode</b>	RG1 1AX
<b>Telephone number</b>	-
<b>Email address</b>	██████████@lichfields.uk

Would you like to be notified of South Oxfordshire District Council's decision to 'make' (formally adopt) the plan?

████████████████████

# **auricl**

## **acoustic consulting**

**Old London Road  
Wheatley**

### **Noise Impact Assessment Report**

5 May 2017

**For**  
Taylor Wimpey Oxfordshire  
Suite J  
Windrush Court  
Abingdon Business Park  
Abingdon  
Oxfordshire  
OX14 1SY

## Contents

EXECUTIVE SUMMARY .....	2
1.0 INTRODUCTION .....	3
2.0 DESCRIPTION OF PROPOSED DEVELOPMENT SITE .....	3
3.0 NOISE SURVEY .....	4
3.1 Methodology .....	4
3.2 Results .....	5
4.0 EXTERNAL NOISE LEVELS AFFECTING THE PROPOSED DEVELOPMENT SITE .....	6
4.1 Noise Map of Proposed Development Site .....	6
4.2 Variation in Noise Levels Across the Site – Daytime .....	6
4.3 Variation in Noise Levels Across the Site – Night-time .....	7
4.4 Discussion of Noise Level Variation .....	9
4.5 Measures to Reduce Site Noise Levels .....	9
4.6 Further Investigations .....	10
APPENDIX A – ACOUSTIC TERMINOLOGY .....	11
APPENDIX B – TIME HISTORY GRAPHS .....	12

**Project Number** 13340 **Issue Date** 5 May 2017

**Document Reference** R/NIA/1/170505 **Version** 01

**Report Produced by**



**auricl Limited**  
www.auricl.com  
[redacted]@auricl.com

107 Cheapside  
**London**  
EC2V 6DN

Centaur House  
Ancells Business Park  
Ancells Road  
**Fleet**  
GU51 2UJ

*Copyright © auricl Limited 2017. All rights reserved. This report is confidential to the party to whom it is addressed and their professional advisers for the specific purpose to which it refers. No responsibility is accepted to third parties, and neither the whole nor any part of this report nor reference thereto may be published or disclosed without the written consent of auricl Limited.*

## EXECUTIVE SUMMARY

A new residential development is proposed on land at Old London Road in Wheatley, Oxfordshire. The site is affected by road traffic noise emanating from the nearby A40.

**auricl** has undertaken an assessment to determine the noise impact on the site and the requirement for mitigation measures.

A noise survey has been undertaken to assess daytime and night-time noise levels affecting the proposed development site. The levels measured were reasonable, considering the locations of the measurement positions and the dominant nearby noise sources.

A noise map has been created to predict the variation in noise levels across the site during daytime and night-time periods and an assessment has been undertaken to determine the noise impact on the site and the requirement for mitigation measures.

It has been concluded that, even for the worst-case façades at the noisiest site boundary, acceptable noise levels can be achieved within the proposed dwellings.

By considering potential screening of the A40 (by a screen or by buildings), as well as the development layout and orientation of the proposed buildings, noise levels affecting the building façades can be significantly reduced. Further noise modelling and assessments are recommended, once the development layout is known.

As such, on the basis that suitable noise mitigation measures are considered as part of the development design, it is concluded that noise should not be considered to prohibit residential development on the site at Old London Road in Wheatley.

## 1.0 Introduction

A new residential development is proposed on land at Old London Road in Wheatley, Oxfordshire. The site is affected by road traffic noise emanating from the nearby A40, therefore **auricl** has been instructed to undertake an assessment to determine the noise impact on the site and the requirement for mitigation measures.

This report presents the methodology and results of a noise survey to determine noise levels affecting the site, as well as an assessment of noise mitigation measures that should be considered as part of the development design.

## 2.0 Description of Proposed Development Site

The proposed development site is an open area of land located to the north-east of Old London Road in Wheatley, Oxfordshire.

The site is bounded to the north-east by the A40, which carries two lanes of road traffic in either direction and is level with the north-eastern site boundary. Old London Road and Waterperry Road run along the south-western and north-western site boundaries respectively, with the latter being at a significantly lower level than the development site and running under the A40 at the northern corner of the site. Further open land is located to the south-east of the site and various residential properties are located near to the north-west and south-west site boundaries.

Figure 2.1 shows the site extent in **red** and its surroundings.

**Figure 2.1 Existing Site Extent and Surroundings**



### 3.0 Noise Survey

#### 3.1 Methodology

A fully manned environmental noise survey has been undertaken during sample daytime and night-time periods to assess noise levels affecting the proposed development site.

Measurements were undertaken between 15:00 and 18:00 hours on Wednesday 3 May 2017 (daytime survey period) and between 05:00 and 07:00 hours on Thursday 4 May 2017 (night-time survey period). These periods were selected as worst-case portions of the daytime and night-time periods.

The equipment used for the noise survey is described in Table 3.1.

**Table 3.1 Description of Equipment used for Noise Survey**

Item	Make & Model	Serial Number
Type 1 sound level meter	Brüel and Kjær 2250	2506361
Type 1 pre-amplifier	Brüel and Kjær ZC 0032	21292
Type 1 ½" microphone	Brüel and Kjær 4189	2595419
Calibrator	01 dB CAL21	35054818

$L_{Amax}$ ,  $L_{Aeq}$  and  $L_{A90}$  sound pressure levels were measured throughout the noise survey periods over contiguous 5 minute periods.

The noise monitoring equipment was calibrated before and after the noise survey periods. No significant change was found. Laboratory equipment calibration certificates can be provided upon request.

Two measurement positions were selected, to assess the variation in noise across the proposed development site. The measurement positions are described in Table 3.2 and indicated on Figure 3.1.

**Table 3.2 Description of Noise Measurement Positions**

Measurement Position	Description
A	Approximately 16m south-west of the north-eastern site boundary
B	Approximately 140m south-west of the north-eastern site boundary

**Figure 3.1 Site Plan Indicating Approximate Locations of Measurement Positions**



At both measurement positions, the measurement microphone was mounted on a tripod approximately 1.5m above ground level in free-field (i.e. not close to any vertical acoustically reflective surfaces).

Throughout the measurement periods, there was no rainfall, a minimally cloudy sky and only light wind. These conditions are considered appropriate for undertaking environmental noise measurements.

### 3.2 Results

The measured  $L_{Amax}$ ,  $L_{Aeq}$  and  $L_{A90}$  sound pressure levels during the daytime and night-time survey periods are shown in the time history graphs in Appendix B.

We would consider the levels measured to be reasonable, considering the location of the measurement positions and the dominant nearby noise sources.

Throughout each noise survey period, the noise climate at both measurement positions was noted to be dominated by road traffic using the A40.

Sporadic road traffic movements were observed along Old London Road and Waterperry Road, however their contribution to the site noise climate was noted to be negligible.

## 4.0 External Noise Levels Affecting the Proposed Development Site

### 4.1 Noise Map of Proposed Development Site

Based on the noise survey results, we have used created a noise model to predict the variation in noise levels across the site during daytime and night-time periods. A 3D view of the model, showing the proposed development site in **red**, is shown in Figure 4.1.

**Figure 4.1 Site 3D Acoustic Model**



Noise maps have been produced for the following parameters, derived from the noise survey results:

- Daytime  $L_{Aeq(16\text{ hour})}$  – Logarithmic average noise level during the day (07:00 – 23:00 hours)
- Night-time  $L_{Aeq(8\text{ hour})}$  – Logarithmic average noise level during the night (23:00 – 07:00 hours)
- Night-time  $L_{Amax}$  – Maximum noise level during the night (23:00 – 07:00 hours)

These parameters are commonly used industry standards and allow comparison with relevant guidance documents (e.g. BS 8233, WHO, etc.).

### 4.2 Variation in Noise Levels Across the Site – Daytime

The predicted variation in daytime  $L_{Aeq(16\text{ hour})}$  noise levels across the site is shown in Figure 4.2.

**Figure 4.2 Daytime  $L_{Aeq}$  (16 hour) Noise Map**



It can be seen that daytime noise levels across the majority of the proposed development site are within the range of 62 – 70 dB  $L_{Aeq}$  (16 hour).

#### **4.3 Variation in Noise Levels Across the Site – Night-time**

The predicted variation in night-time  $L_{Aeq}$  (8 hour) and  $L_{Amax}$  noise levels across the site is shown in Figures 4.3 and 4.4 respectively.

**Figure 4.3 Night-time  $L_{Aeq}$  (8 hour) Noise Map**



**Figure 4.4 Night-time  $L_{Amax}$  Noise Map**



It can be seen that night-time noise levels across the majority of the proposed development site are within the range of 58 – 66 dB  $L_{Aeq(8\text{ hour})}$  and 66 – 78 dB  $L_{Amax}$ .

#### 4.4 Discussion of Noise Level Variation

Due to the size and topography of the site, it can be seen that there is a reasonable variation in noise levels (8 dB  $L_{Aeq,T}$  and 12 dB  $L_{Amax}$ ) from the noisiest north-eastern boundary with the A40 across to the south-west. This is in the absence of any site boundary screening or any buildings on the site, both of which would be expected to provide significant additional attenuation of noise levels across the site, as described in the sections below.

#### 4.5 Measures to Reduce Site Noise Levels

The following sections describe measures that could be considered as part of the development design to further reduce the effect of road traffic noise across the proposed development site.

##### 4.5.1 Screening of Road Traffic Noise

Construction of an acoustic screen along the noisiest (north-eastern) site boundary would provide significant attenuation of noise levels affecting the facades of the proposed development.

In general, a proprietary timber acoustic screen/fence would be expected to provide at least 5 dB attenuation, if it obscures line of sight between the source (e.g. A40) and receiver (residential facade). In general, the taller the screen, the greater the attenuation.

A brick wall or earth/grass bund should have a similar attenuation effect. Foliage generally provides negligible sound reduction, unless it is used to visually obscure a dense acoustic screen.

##### 4.5.2 Development Layout

Consideration should be given to the layout of the site and the proposed buildings. For example, taller buildings could be constructed at the noisier (north-eastern) site boundary, to provide screening (and acoustic attenuation) of the main noise source – the A40.

If possible, less noise-sensitive buildings could be constructed along the noisiest site boundary. If the boundary buildings are residential, then their orientation could be considered such that habitable rooms (living rooms and bedrooms) face south-west (away from the A40), and less sensitive rooms (kitchens, bathrooms, circulation) face the A40.

##### 4.5.3 Construction of External Façades

British Standard 8233: 2014 “*Guidance on sound insulation and noise reduction for buildings*” recommends acceptable internal noise limits for residential dwellings, as presented in Table 4.1, which are currently considered to be the industry standard.

**Table 4.1 BS 8233: 2014 Internal Noise Limits**

Activity	Location	07:00 – 23:00 hours	23:00 – 07:00 hours
Resting	Living room	35 dB $L_{Aeq(16\text{ hour})}$	-
Dining	Dining room/area	40 dB $L_{Aeq(16\text{ hour})}$	-
Sleeping / daytime resting	Bedroom	35 dB $L_{Aeq(16\text{ hour})}$	30 dB $L_{Aeq(8\text{ hour})}$

In addition, the World Health Organisation (WHO) document “*Guidelines for Community Noise*” (1999) advises the following:

*“For a good sleep, it is believed that indoor sound pressure levels should not exceed approximately 45dB  $L_{Amax}$  more than 10-15 times per night (Vallet & Vernet 1991)”*

For residential facades directly facing the A40, the BS 8233/WHO standards above could be achieved by the appropriate design and construction of external facades, using, for example:

- Acoustic double glazing (e.g.  $R_w$  45 dB)
- Acoustic trickle ventilators (e.g.  $D_{ne,w}$  41 dB)
- Dense external walls (e.g. brick/block cavity)

The construction suggestions made above represent the worst-case and the acoustic requirements of the various buildings and facades will vary, depending on their orientation, location and their exposure to the A40.

If the screening and building orientation recommendations in Sections 4.5.1 and 4.5.2 are considered, then it should be possible to reduce the façade acoustic requirements for quieter areas of the site, to the extent that conventional non-acoustic glazing and ventilator constructions could be used in certain areas.

The ventilation strategy should also be considered, since open windows will result in internal noise levels that do not comply with the BS 8233 or WHO standards.

## **4.6 Further Investigations**

### **4.6.1 Noise Mapping**

Once the proposed development layout is known, further noise mapping would be advisable, to predict in more detail the variation in noise levels affecting the various buildings and facades across the proposed site. This will allow the screening effect of the proposed buildings (and any boundary screens/bunds) to be taken into account, and allow more specific recommendations to be made in relation to the external façades of each building or group of buildings.

### **4.6.2 External Façade Acoustic Specifications**

The external facade constructions described in this report are for preliminary guidance purposes only and we would strongly recommend that, following detailed noise mapping, the acoustic requirements of the various building facades are specified in detail.

This would involve an octave band acoustic specification detailing the minimum sound reduction indices to be achieved by the proposed glazing, including the effects of frames, seals, opening lights, etc. The acoustic specifications should also detail the testing methodology and the results presentation format. The tests will be required to be undertaken in accordance with BS EN ISO 10140-2: 2010. This will involve testing in 1/3 octaves from at least 100 Hz to 5000 Hz inclusive, with the results then appropriately converted into octave bands for comparison with the acoustic specifications.

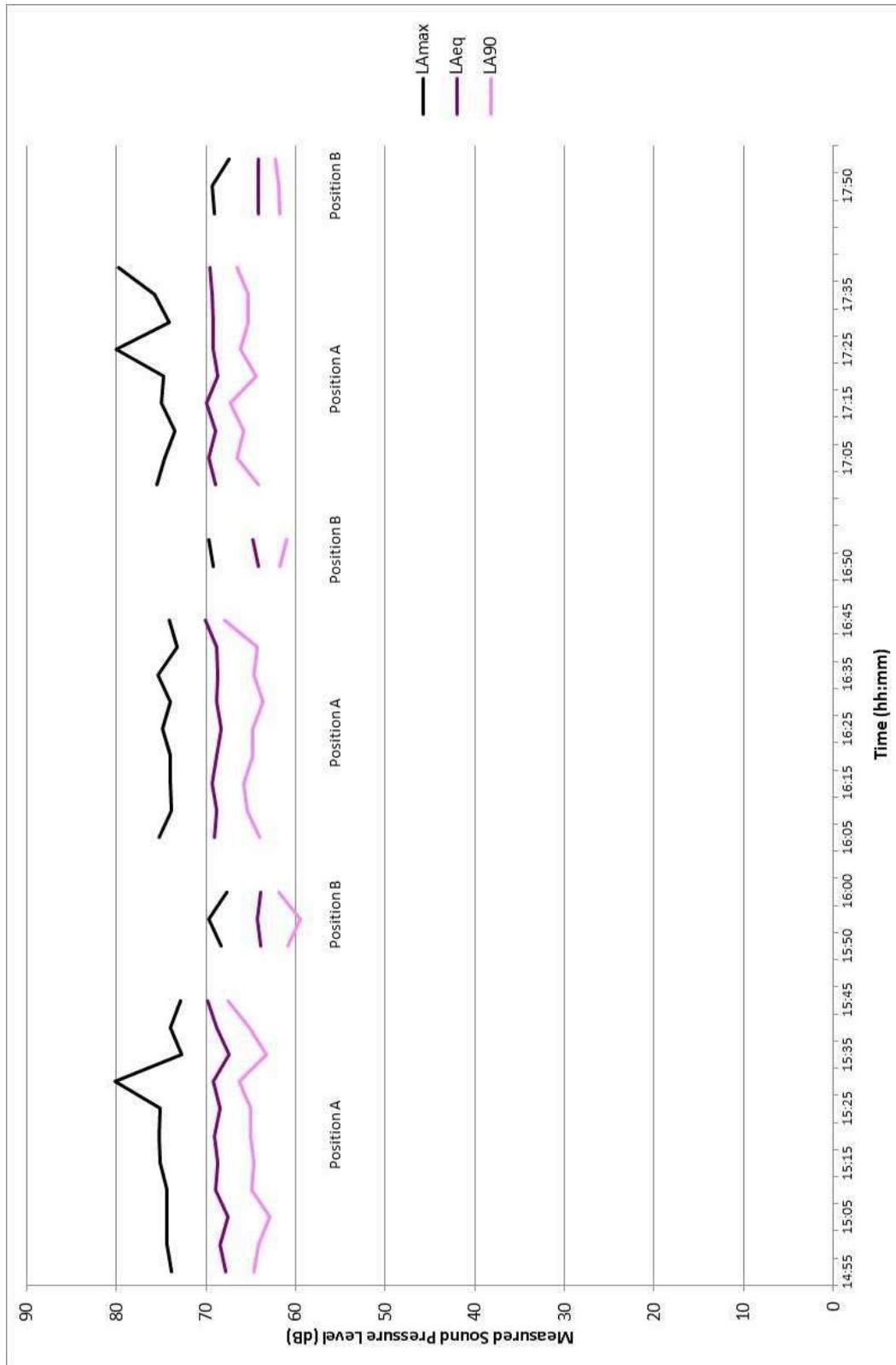
The glazing and trickle ventilator suppliers will be required to submit laboratory test results for the proposed units, based on samples which are fully representative of the unit to be installed on-site. The samples will be required to be inclusive of fully representative frames, seals, opening lights, etc. The test data will need to be reviewed against the acoustic specifications and only units that achieve the acoustic specifications will be approved.

## Appendix A – Acoustic Terminology

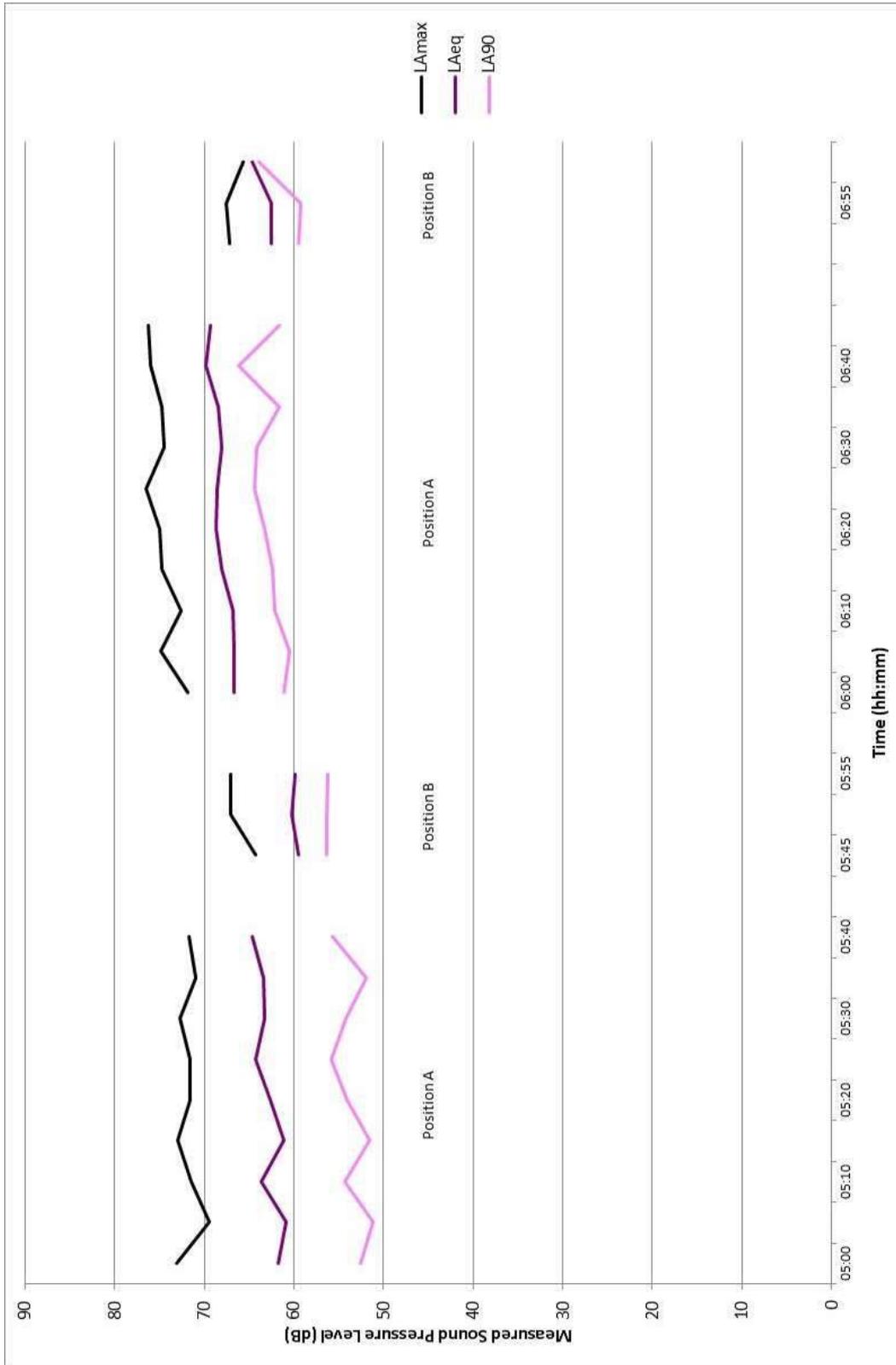
Parameter	Description
Decibel (dB)	A logarithmic scale representing the sound pressure or power level relative to the threshold of hearing ( $20 \times 10^{-6}$ Pascals).
Sound Pressure Level ( $L_p$ )	The sound pressure level is the sound pressure fluctuation caused by vibrating objects relative to the threshold of hearing.
A-weighting ( $L_A$ or dBA)	The sound level in dB with a filter applied to increase certain frequencies and decrease others to correspond with the average human response to sound.
$L_{Aeq,T}$	The A-weighted equivalent continuous noise level over the time period T This is the sound level that is equivalent to the average energy of noise recorded over a given period.
$L_{A90}$	The noise level exceeded for 90% of the time (also referred to as the background noise level)
$R_w$	The weighted (w) sound reduction index (R), a single figure rating of the laboratory airborne sound insulation performance of a construction, usually measured across the frequency range 100-3150Hz. The higher the value, the greater the sound insulation, and the more onerous the requirement.
$D_{n,ew}$	The weighted (w) element (e) normalised (n) level difference (D), an indicator of the ability of a small building element (such as a trickle ventilator) to reduce sound in a particular frequency band. The higher the value, the greater the sound reduction, and vice versa.

## Appendix B – Time History Graphs

### Daytime



Night-time





# Sustainability Appraisal

## Land at Old London Road, Wheatley

Job Ref: BR-512-0005  
Revision: 00  
Issue Date: 15<sup>th</sup> May 2017



## Table of Contents

1. Introduction.....	1
2. Sustainability Appraisal .....	3
3. Report Summary & Conclusion .....	9

## Figures

Figure 1-1 Site Location .....	1
--------------------------------	---

## Tables

Table 2-1 Modelled Amenities .....	5
Table 2-5 Scoring Methodology .....	6
Table 2-6 Resultant Score Factors .....	6
Table 2-7 Updated Sustainability Appraisal - Model Results .....	7
Table 2-5 Site Specific Model Results.....	8

## Appendices

N/A

## 1. Introduction

### 1.1 Background

1.1.1 Calibro has been appointed by Taylor Wimpey Oxfordshire to provide an appraisal of the transport-related sustainability credentials of their site at Old London Road, Wheatley (herein referred to as “the site”) in support of its on-going promotion for residential development via the Oxford Local Plan (2016-2036).

1.1.2 The site is shown below for context.

Figure 1-1 Site Location



### 1.2 Structure of the Report

1.2.1 The report sets out the various considerations under the following structure:

#### Section 2.0: Strategic Accessibility Model

This section of the report provides a concise critique of the Council’s SA and identifies an appropriate methodology that responds to the various omissions. The results of the mode are also discussed.

#### Section 3.0: Report Summary & Conclusion

---

A summary of the findings of the report is provided within this section of the report together with an overriding conclusion.

## 2. Sustainability Appraisal

### 2.1 Introduction

- 2.1.1 Consideration of accessibility is typically limited to local opportunities to access non-car travel modes and service frequencies in that vicinity. However, this approach, whilst useful as a starting point, fails to consider the more significant issue of whether those local facilities and services provide access to destinations that afford opportunities to access jobs, shops, education and health amenities.
- 2.1.2 Moreover, where attempts have been made to consider these in the past, the evaluation process often fails to recognise the importance that each amenity can contribute to the three strands of sustainability, as set out under the NPPF. In this regard, whilst all of the specified amenities contribute to the social dimension of sustainability, the visitation rates to some amenities is significantly less than others. For example, it is common for people to travel to and from work five out of seven days each week, whereas visits to post offices and libraries are undertaken on a less frequent and more ad-hoc basis.
- 2.1.3 Consequently, sites that afford the greatest opportunity to access those most frequently visited amenities by non-car travel modes have the greatest potential to reduce car use, and thereby offer the greatest potential to use natural resources prudently, minimise pollution and support a movement towards a low carbon economy, in line with Paragraph 7 of the NPPF.
- 2.1.4 In order to address these points, a two-tier appraisal has been undertaken to assess the sustainability credentials relevant to the site. In this respect, a first tier assessment of the sustainability merits of Wheatley, as the settlement within which the site is proposed, has been considered against other Built-Up-Areas (BUAs), including the following:-
- a) Woodcote;
  - b) Cholsey;
  - c) Chinnor;
  - d) Chalgrove;
  - e) Benson;

- f) Nettlebed;
- g) Sonning Common;
- h) Goring;
- i) Watlington; and
- j) Crowmarsh.

2.1.5 A more fine-grained analysis has also been undertaken of individual site allocations and includes consideration of the following:

- a) Wheatley Campus;
- b) Wheatley East;
- c) West of Priests Close, Nettlebed;
- d) Joyce Grove, Nettlebed;
- e) Land at Old London Road, Wheatley (The Proposal Site);
- f) Benson Lane, Crowmarsh Gifford; and
- g) Newnham Manor, Crownmarsh Gifford.

2.1.6 The methods and results of the BUA assessment are discussed at Section 2.2 of this report whilst a summary of the results of the site comparison is provided at Section 2.3.

## 2.2 BUA Analysis

### Methodology

2.2.1 The analysis has been informed by use of a GIS-based accessibility model which was constructed to incorporate all BUAs, the geographical extent of which was defined by Office of National Statistics boundary data. All available non-car travel infrastructure within and around the identified BUAs, including roads with contiguous footways, were included within the model together with the most up-to-date public bus timetable information.

2.2.2 This was then supplemented by geo-referenced amenity data for the following types of local services.

Table 2-1 Modelled Amenities

Community	Education	Food stores	Health & Wellbeing	Employment
Post Office	Primary Schools	Supermarket	Hospitals	Jobs*
Library	Secondary Schools	Convenience Store	Doctor's Surgeries	
	Further Education		Dental Practices	
			Pharmacies	
			Sports & Leisure	

\*employment centres modelled by reference to Lower Super Out Areas using population weighted centroids from ONS data.

2.2.3 The accessible catchments for non-car travel modes between BUAs and above amenities have been modelled from data points set at 100-metre intervals within each BUA, and 85<sup>th</sup> percentile measures being determined as the representative performance for each BUA.

2.2.4 A journey between the data-point and an amenity was assumed to be viable if it satisfied the following criteria: -

- A maximum walk threshold of 2-kilometres for all trips other than food shopping, in line with guidance provided within the IHT's document entitled 'Planning for Journeys on Foot';
- A maximum cycle threshold of 5-kilometres was adopted for all trip types, in line with industry-standard assumptions; and
- A maximum bus journey of 36-minutes was adopted for all journey purposes, which reflects the average bus journey as given by the Department for Transport in its document entitled Transport Statistics Great Britain 2015, for journeys in the South East of England.

2.2.5 A scoring system was then adopted to take account of the relative attraction value of each amenity and of the non-car travel mode by which it is accessible. This reflects the fact that, whilst a data-point may be accessible by bus or cycle, an alternative data-point that is accessible by foot should be favoured due to the fact it can be undertaken by anyone, without the need for special equipment, can be undertaken as an unplanned journey, offers personal health benefits and does not result in vehicle emissions.

2.2.6 The scores are calculated on the basis of the below:-

- i. The Department for Transport’s National Travel Survey: England 2015<sup>1</sup> (as the most up-to-date release) has been used to identify the proportion of all trips associated with each type of amenity. For example, all amenities fall within a community use, shopping or commuting.
- ii. The National Travel Survey (NTS) has also been used to identify the mode share of trips undertaken in respect of each type of amenity.
- iii. The number of jobs that lie within the accessible catchment areas, weighed in accordance with the mode shares for commuting trips (as ‘ii’ above).

2.2.7 The resultant scores are shown in the below Table 2-5.

Table 2-2 Scoring Methodology

Category	%age of Trips	Mode Share			
		Walk	Bicycle	Bus	Rail
Commuting	19.50%	36.20%	13.90%	28.10%	21.80%
Leisure	19.50%	59%	9.70%	22.30%	9%
Personal Business	23.20%	68.50%	4.10%	23.70%	3.70%
Shopping	23.20%	66.50%	3.60%	27.70%	2.20%
Education	14.60%	74.60%	2.90%	20%	2.40%
<b>Total</b>	100.00%	-	-	-	-

2.2.8 Combination of the above yields factors by which to reconcile the attraction of the amenity type and the mode by which you may travel there. The resultant scores are shown in the below Table 2-6.

Table 2-3 Resultant Score Factors

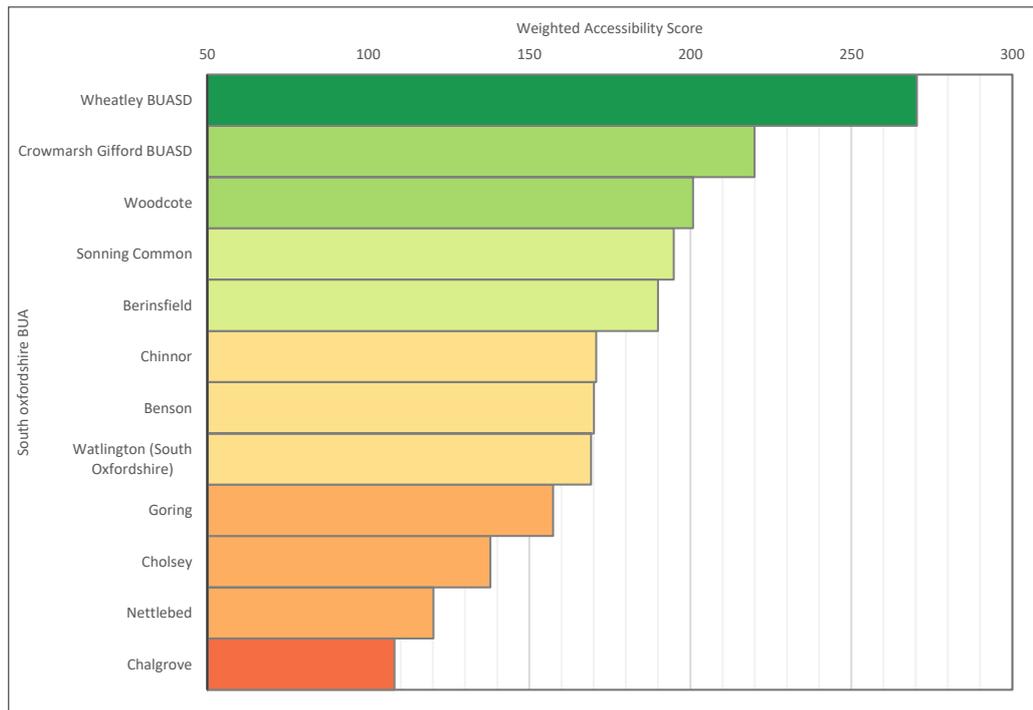
Category	Mode Share			
	Walk	Bicycle	Bus	Rail
Commuting	7.1	2.7	5.5	4.2
Leisure	11.5	1.9	4.4	1.8
Personal Business	7.9	0.5	2.7	0.4
Shopping	15.4	0.8	6.4	0.5
Education	10.9	0.4	2.9	0.4

<sup>1</sup> NTS0409 Table – Average Number of Trips (Trip Rates) By Purpose and Main Mode - 2015

**Model Results**

2.2.9 Application of the above scores shown at Table 2-6 above provides a rounded view of the relative accessibility of each the sites considered within the model. The results are shown in the below Table 2-7.

**Table 2-4 Updated Sustainability Appraisal - Model Results**



**Conclusion**

2.2.10 It is evident from the analysis above that Wheatley is the most accessible settlement of those considered by this assessment, and by some significant margin. Indeed, Wheatley scores a total of 270 points whereas the next nearest BUA scores just 220 points. This suggests that Wheatley is some 23% better than the next best settlement.

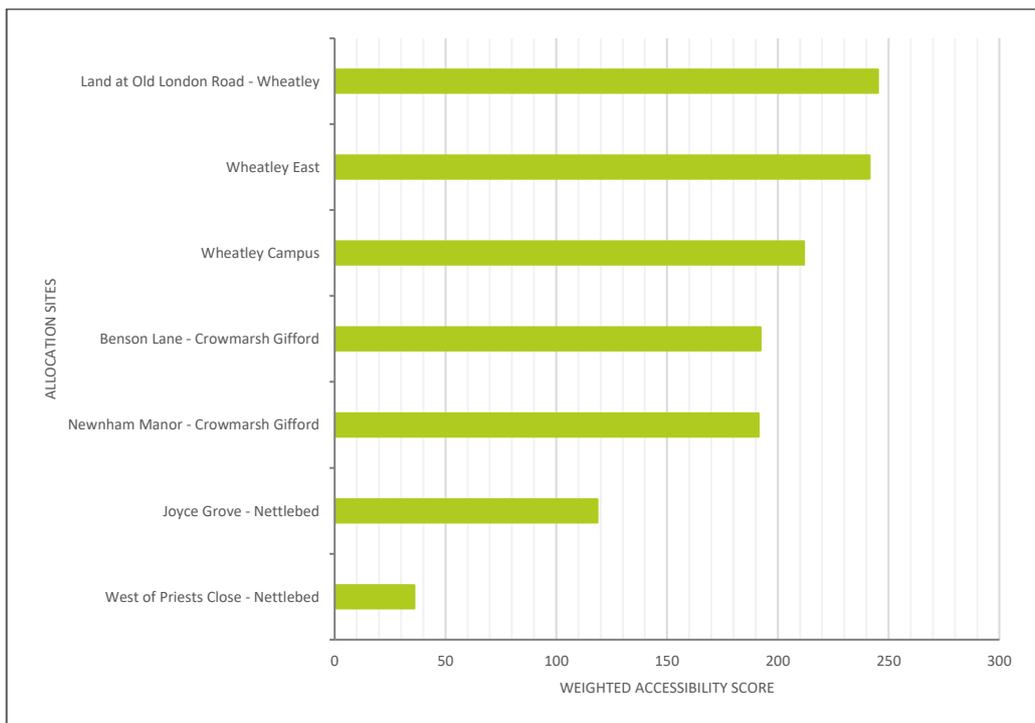
2.2.11 It is therefore concluded on evidence that Wheatley is not only a suitable settlement for residential development but is the most sustainable location for such development.

### 2.3 Site-Specific Analysis

2.3.1 In support of the above analysis, the GIS model was updated on the same principles to enable a comparison of the aforementioned allocation sites. In this respect, the limits of each allocation site were identified and data-points set at 100-metre intervals. However, to reflect the potential requirement for internal infrastructure to provide the requisite connectivity to the existing networks, the optimum results (i.e. shortest or quickest time) was adopted for the purpose of evaluation. This ensures an even-handed evaluation.

2.3.2 Adopting the same scoring system identified previously at Section 2.2, the following scores were identified for each allocation site.

Table 2-5 Site Specific Model Results



#### Conclusion

2.3.3 It is clear from the above that the site performs better than all other site allocations under consideration, and is therefore considered to be the most sustainable location in transport terms, performing marginally better than Wheatley East and some 16% better than the Wheatley Campus site.

### 3. Report Summary & Conclusion

#### 3.1 Report Summary

3.1.1 Calibro has been appointed by Taylor Wimpey Oxfordshire to provide an appraisal of the transport related sustainability credentials of their site at Land at Old London Road, Wheatley in support of its on-going promotion for residential development.

3.1.2 The findings of the report may be summarised as follows:-

- i. An updated Sustainability Appraisal was undertaken on the basis of a GIS-based accessibility model that was constructed to incorporate all available non-car travel infrastructure set against available local amenities. This was used to identify the journey distances / time between each site and the respective amenity from data points set at 100-metre intervals within the sites.
- ii. Stated maximum journey distances informed by industry-standard data were used to identify viable journeys. Where journeys exceed the maximum allowable travel time, they were considered to be inaccessible to that amenity.
- iii. The results at this stage were compared for each site with the results clearly demonstrating that the Wheatley built-up-area was more proximate to a larger number of amenities, by a larger number of travel modes, than the other built-up-areas identified above. It is therefore concluded that Wheatley is more aligned with the social dimension of sustainability, as set out under the NPPF.
- iv. A score was applied to each viable journey that reflected the combined attractiveness of the mode of travel and the frequency of visits undertaken to that type of amenity.
- v. The results indicate that the Land at Old London Road site would perform better than the other site allocations identified above, with a score fractionally higher than Wheatley East. This indicates that the Land at Old London Road site would offer greater potential to reduce reliance on car travel and thereby reduce potential vehicle emissions, increase productive time in the economy and improve health. The Land at Old London Road site would therefore be more closely aligned with the environment and economy dimensions of sustainability,

as set out in the NPPF.

### **3.2 Report Conclusion**

- 3.2.1 On the basis of the evidence presented within this Sustainability Appraisal, it is evident that the Land at Old London Road site is the optimal site for development in the context of site location and accessibility to amenities with consideration to guidance set out within the NPPF.



██████@calibro-consultants.com  
www.calibro-consultants.com

## **Land off Old London Road, Wheatley**

### **Ecology Position Paper**

#### **C\_EDP4048\_01\_150517**

## **1 Introduction**

- 1.1. This Ecology Position Paper has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Taylor Wimpey UK Ltd. It considers the ecological issues pertinent to the potential residential development on Land off Old London Road, Wheatley (hereafter referred to as “the site”). In doing so, this paper identifies ecological constraints and opportunities that influence the scheme’s deliverability and/or capacity for residential development. Recommendations are also given for the scope of further ecological assessment work required to inform any future planning application
- 1.2. The site is located on the eastern side of Wheatley, a small town situated around five miles east of Oxford city centre. It comprises a single semi-improved grassland field, bounded by mature hedgerows or broad-leaved woodland. The western and southern site boundaries adjoin Waterperry Road and Old London Road respectively, with residential properties beyond. The A40 is situated along the northern boundary of the site, whilst off-site to the east is a small area of plantation woodland and rough grassland. The site appears to have been unmanaged for a few years and is becoming encroached with suckering trees.
- 1.3. The site measures approximately c.3.4 hectares (ha) and is centred approximately at Ordnance Survey Grid Reference (OSGR) SP 606056. The local planning authority is South Oxfordshire District Council.

## **2 Methodology**

- 2.1. This Position Paper has been informed by initial baseline studies including a desk study and Extended Phase 1 Survey. The desk study involved collation and review of information on designated sites, notable/rare habitats and protected species records from freely available online sources as well as Thames Valley Environmental Records Centre (TVERC). An Extended Phase 1 Survey was undertaken by an experienced EDP Ecologist on 05 May 2017. May is considered to be an optimal time of year for Phase 1 surveys and as such the results are not considered to be seasonally constrained.



### 3 Baseline Information

#### ***Designated Sites***

##### *Statutory Designations*

- 3.1. No part of the site is covered by any statutory designations of international or national importance. However, within 2km of the site there are two Sites of Special Scientific Interest (SSSIs), namely Littleworth Brick Pit SSSI (1.4km south-west) and Lyehill Quarry SSSI (1.6km north-west).
- 3.2. Both these SSSI's are designated for their geological interest and as such, due to their geographical separation from the site, their designated interest features will not be affected by the development proposals. The proposed development of the site is therefore not constrained by statutory designations.

##### *Non-statutory Designations*

- 3.3. No part of the site is covered by any non-statutory designations and none are present within 1km of the site boundary. As such non-statutory designated sites are not considered further in this report.

#### ***Habitats***

- 3.4. The Extended Phase 1 Survey of the site has recorded a small range of habitats present within the site. Their nature and distribution is described below and illustrated on **Plan EDP 1**.

##### *Semi-improved Neutral grassland*

- 3.5. The site comprises a single field supporting semi-improved neutral grassland. Grass species recorded included downy oat, crested dogs-tail, sweet vernal grass, sheep's fescue, meadow fox-tail, false-oat grass, cocks-foot, perennial rye grass and Yorkshire fog. A range of herb species were also recorded including common vetch, ox-eye daisy, mouse-ear, common hogweed, common nettle, scented mayweed, lady's bedstraw, common sorrel, bittercress *sp.*, meadow buttercup, sedge *sp.* and germander speedwell. Perennial rye grass was found though only occasionally suggesting lower nutrient levels and a low level of recent agricultural improvement.
- 3.6. The site appears to have been unmanaged in recent years, which has resulted in the grassland becoming encroached, especially in the north, with suckering trees up to 1.5m in height. These scattered trees are dominated by hawthorn but blackthorn, rose and elm are also present, and scattered bramble scrub persists along the southern boundary. The unmanaged sward reached approximately 40cm in height at the time of survey, and has become tussocky with a thick 'thatch' layer, suggesting a lack of recent management.



- 3.7. The semi-improved grassland is considered to be of low (local level) intrinsic value, supporting some wildflower species but showing signs of previous agricultural improvement and recent neglect, and being of a small size with limited connectivity to the wider landscape.

*Species-rich Hedgerows*

- 3.8. The southern and eastern site boundaries support mature species-rich hedgerows. The southern boundary along Old London Road is considered likely to support sufficient features to warrant it to be considered 'Important' under the Wildlife and Landscape criteria of the Hedgerow Regulations (1997).
- 3.9. The hedgerow network is mature, species rich and provides connectivity to off-site habitats to the east. Hedgerows are also considered a Habitat of Principal Importance. However, the value of the hedgerow network is limited by its overall length, and severance from nearby habitats in the wider landscape by the adjoining A40 and residential settlement.
- 3.10. Overall, the hedgerows are considered to be of low (local level) ecological value.

*Broad-leaved Semi-natural Woodland*

- 3.11. The northern and western boundaries support narrow belts of broad-leaved semi-natural woodland. The woodlands provide a strong, species-rich link to the offsite woodlands to the east as well as connecting into the onsite hedgerow network to the south. Lowland mixed deciduous woodlands are a Habitat of Principal Importance. As with the hedgerows, the value of the woodland belts is limited by their severance from nearby habitats to the north, west and south by the settlement and adjoining A40.
- 3.12. Overall, the broad-leaved semi-natural woodlands are considered to be of low (local level) ecological value.

*Mixed Plantation Woodland*

- 3.13. A small mixed plantation woodland is present adjacent to the eastern site boundary comprising predominantly fir species with scattered deciduous broad-leaved trees. Rough grassland and scattered bramble scrub is present in the open areas. Connectivity with the woodland is constrained by roads, with the A40 to the north and Old London road to the south, and arable land to the east.
- 3.14. Overall, the mixed plantation woodland is considered to be of low (local level) ecological value.



### *Waterbodies*

- 3.15. There are no ponds present within the site and the old ditches associated with the hedgerows were dry at the time of survey with little evidence of them having been wet recently. The only two ponds within 500m of the site are separated by the A40 which is considered to be a significant barrier to the dispersal of great crested newts (if present in the local area).

## **4 Constraints and Opportunities**

- 4.1. Owing to the nature of the habitats present, their limited extent and connectivity to valuable off-site habitats, it is considered unlikely that significant protected species assemblages will be present on site. However, it is necessary to ensure that any forthcoming development proposals for the site are compliant with relevant wildlife legislation and planning policies relating to nature conservation.
- 4.2. Therefore, on the basis of the initial baseline investigations undertaken including the desk study and extended Phase 1, it is considered that the following species/species groups have potential to utilise the Site, and may require further consideration within any forthcoming ecological appraisal:
- Breeding birds – potentially nesting within the site’s boundary habitats, including hedgerows, broadleaved woodland and scrub;
  - Bats – potential for low level of foraging/ commuting activity, particularly along the site’s boundary habitats, and potentially roosting in boundary trees;
  - Badgers – potentially foraging within the grassland, although no evidence of their presence confirmed during initial site walkover; and
  - Reptiles – potentially present breeding, hibernating and foraging within the site’s grassland and woody habitats.
- 4.3. The actual need and scope of further Phase 2 surveys will be subject to the assessment of likely impacts arising from the development proposals and agreed via consultation with the Local Planning Authority (LPA) Ecologist to establish the level of survey requirement.
- 4.4. Subject to the findings of further Phase 2 surveys and ecological assessment, it is considered likely that any ecological interest features potentially occurring within the Site could be readily safeguarded through appropriate impact avoidance/ mitigation/ compensation measures and masterplan design principles, as described below:



- Retention and appropriate buffering of existing hedgerows/woodland belts to maintain the site's permeability for species movements, including utilisation of existing gaps in boundary vegetation for access where possible;
- Strengthening and enhancement of existing boundary vegetation through new tree/ shrub planting and/or species rich grassland creation;
- Provision of new opportunities for nesting/ roosting/ foraging/ breeding and hibernating through habitat creation;
- Integrated sustainable drainage system (SuDS) including the provision of open water/marginal aquatic habitats to provide water attenuation and increase habitat diversity on-site; and
- Creation, restoration or enhancement of grassland to encourage the development of a species-rich wildflower grassland with structural and botanical diversity.

## **5 Conclusions**

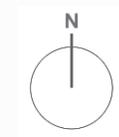
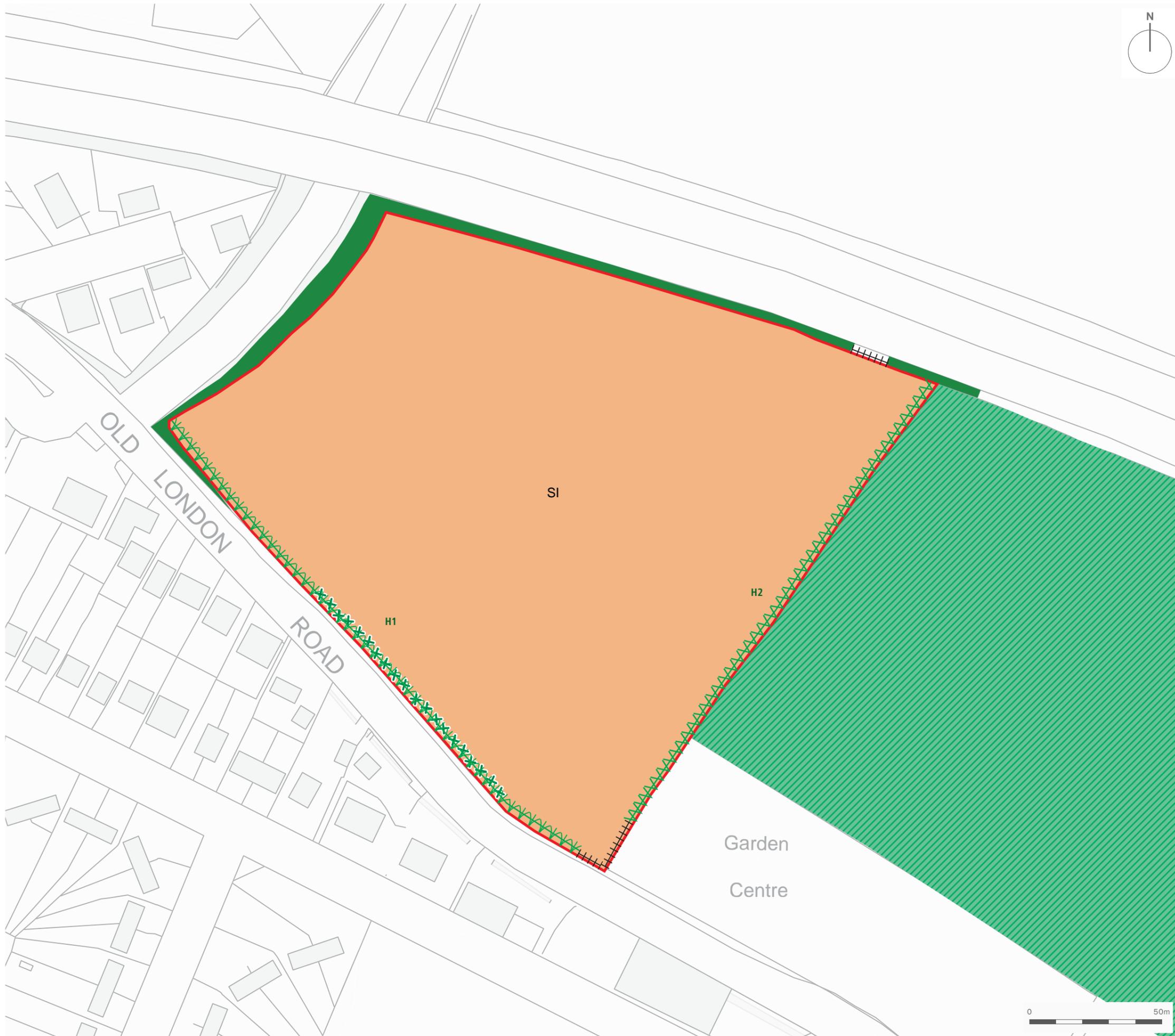
- 5.1. The initial baseline studies undertaken for the site have confirmed that the site is not subject to any 'in principle' ecological constraints, and offers sufficient flexibility to ensure compliance with paragraph 118 of the National Planning Policy Framework (NPPF) through the avoidance of 'significant harm' to biodiversity. Furthermore, an appropriately designed development incorporating appropriate mitigation and enhancement, as described above, has the potential to ensure no net loss, and possibly a net gain, to biodiversity.
- 5.2. On this basis, EDP finds that by virtue of the relatively limited constraint posed by the site's habitats and protected species interest, the scheme is capable of compliance with relevant planning policy for the conservation of the natural environment at all levels.

---

## Plan

### **Plan EDP 1**

Extended Phase 1 Habitat Survey  
(EDP4048/02 09 May 2017 HS/ND)



- Site Boundary
- Broad-leaved Semi-natural Woodland
- Plantation Mixed Woodland
- Intact Species-rich Hedgerow
- Intact Species-rich Hedgerow and Trees
- x x Scattered Scrub
- SI Semi-improved Neutral Grassland
- Fence
- H1 Hedge Number

client  
**Taylor Wimpey UK Limited**

---

project title  
**Land Off Old London Road, Wheatley**

---

drawing title  
**Plan EDP 1: Extended Phase 1 Habitat Survey**

---

date	09 MAY 2017	drawn by	HS	<b>DRAFT</b>
drawing number	EDP4048/02	checked	ND	
scale	Refer to scale bar	QA		



@edp-uk.co.uk www.edp-uk.co.uk  
 Cirencester 01285 740427 Cardiff 02921 671900 Shrewsbury 01939 211190



**Land off Old  
London Road,  
Wheatley,  
Oxfordshire**

**Landscape  
Position Paper  
and Green Belt  
Review**

Prepared by:  
**The Environmental  
Dimension  
Partnership Ltd**

On behalf of:  
**Taylor Wimpey UK  
Limited**

June 2017  
Report Reference  
**EDP4048\_03**

## Contents

<b>Section 1</b>	Introduction .....	1
<b>Section 2</b>	Landscape and Visual Matters.....	3
<b>Section 3</b>	Green Belt Review.....	13
<b>Section 4</b>	Conclusions .....	21

## Appendices

**Appendix EDP 1** Promotion Site - Land Off Old London Road:  
1.1 Landscape Character and Visual Amenity Description  
1.2 Photographic Plates Illustrating Landscape Context  
1.3 **Plan EDP L4** Landscape Character and Context  
(EDP4048/06a 29 June 2017 HS/JM)

**Appendix EDP 2** Comparison Site 9 - Land South of London Road:  
2.1 Landscape Character and Visual Amenity Description  
2.2 Photographic Plates Illustrating Landscape Context  
2.3 **Plan EDP L5** Site Landscape Character and Context  
(EDP4048/08a 29 June 2017 HS/JM)

**Appendix EDP 3** Comparison Site 10 - Land South of Beech Road:  
3.1 Landscape Character and Visual Amenity Description  
3.2 Photographic Plates Illustrating Landscape Context  
3.3 **Plan EDP L6** Site Landscape Character and Context  
(EDP4048/07a 29 June 2017 RB/JM)

**Appendix EDP 4** Comparison Site 11 - Land off Littleworth Road:  
4.1 Landscape Character and Visual Amenity Description  
4.2 Photographic Plates Illustrating Landscape Context  
4.3 **Plan EDP L7** Site Landscape Character and Context  
(EDP4048/09a 29 June 2017 HS/JM)

**Appendix EDP 5** Green Belt Review Methodology

**Appendix EDP 6** Green Belt Review Analysis

## Plans

**Plan EDP L1** Site Location Plan with Comparison Sites  
(EDP4048/04a 29 June 2017 LB/MJ)

**Plan EDP L2**      Local Landscape Planning Designations and Considerations  
(EDP4048/03a 29 June 2017 LB/MJ)

**Plan EDP L3**      Published Landscape Character  
(EDP4048/05a 29 June 2017 AL/JM)

*This version is intended for electronic viewing only*

<b>For EDP use</b>	
Report no.	L_EDP4048_03
██████	██████████
██████████	██████████
██████████	██████████████
██████	██████████████
Date	29 June 2017

*This page has been left blank intentionally*

## Section 1 Introduction

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Taylor Wimpey UK Limited (the 'client') to undertake a preliminary landscape appraisal and Green Belt review of a potential site for residential development at land off Old London Road, Wheatley, Oxfordshire (the 'promotion site') and three comparative sites, named as land South of London Road, land South of Beech Road, and land off Littleworth Road. The location of the promotion site and the comparative sites are shown on **Plan EDP 1**.
- 1.2 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The Practice operates throughout the UK from offices in Cirencester, Cardiff and Shrewsbury. Details can be obtained at [www.edp-uk.co.uk](http://www.edp-uk.co.uk).

### Context and Purpose

- 1.3 The current Draft Wheatley Neighbourhood Plan (2017) reviewed a number of sites around the edge of Wheatley to identify land for proposed allocation for development under the South Oxfordshire Local Plan. Two sites were selected, which did not include the promotion site or the three comparison sites reviewed in this landscape position paper. The Neighbourhood Plan does not include any detailed assessment information on the unselected sites, stating only that the review process was based upon the position that "*no development in the Green Belt would be allowed*". The largest of these sites, identified as WHE25, is located outside of the village, beyond the A40 to the north.
- 1.4 Similarly, the South Oxfordshire Strategic Housing Land Availability Assessment (SHLAA, 2013) which is referenced in the Neighbourhood Plan, in assessing the promotion site stated that it was "*considered not suitable in principle due to sloping of the site and it is within Green Belt*". It also noted the Flood zone along part of the southern boundary as a physical limitation. The comparison sites were all described as "*not suitable as they are within the Green Belt*".
- 1.5 This stance appears to conflict with the conclusions of the Local Green Belt Study for South Oxfordshire District (2015) which is an evidence base document for the emerging local plan. This study suggested revising the Green Belt boundaries around Wheatley settlement to incorporate the promotion site and a number of other sites, including the three comparison sites reviewed in this landscape position paper.
- 1.6 As expanded upon within the accompanying representations (prepared by Lichfield on behalf, of Taylor Wimpey) to the draft Wheatley Neighbourhood Plan, our client is promoting the site off Old London Road as a location for residential development on the northern edge of Wheatley, south of the A40. The purpose of EDP's work is to deepen the understanding of the landscape and Green Belt considerations that may affect the site's 'in principle'

suitability for development. To this end, the following specific work items have been undertaken:

- A data trawl of relevant landscape designations and character assessments, and a field appraisal of the promotion site's landscape character and visual amenity;
- Comparative study of landscape character and visual amenity considerations relating to the three comparison sites;
- A consideration of the performance of the promotion site against the purposes of the Green Belt designation in the context of the potential removal of the promotion site from the wider Green Belt; and
- Comparative study of the performance of the three comparison sites against the Green Belt.

1.7 The appendices and plans provided to the rear of this landscape position paper should be referred to alongside the main body of text.

## Section 2

### Landscape and Visual Matters

#### Introduction

- 2.1 Following a desk-based analysis of landscape-related local plan evidence base documents, local designations and character, site appraisals were undertaken on 22nd June 2017. This involved walking and driving the local area to understand the character and context of the promotion site and to consider the likely landscape and visual effects that might arise from development of the promotion site. A photographic record was also made of the sites and of key views into the sites from the local area.

#### Local Plan Evidence Base Documents

- 2.2 In addition to the Draft Wheatley Neighbourhood Plan and SHLAA 2013 mentioned in the introduction to this paper, another document which has assessed the suitability of sites around Wheatley settlement for development is the Landscape Capacity Assessment for Sites on the Edge of Larger Villages in South Oxfordshire (May 2014). Its findings are summarised below.

#### ***Landscape Capacity Assessment for Sites on the Edge of Larger Villages in South Oxfordshire (May 2014)***

- 2.3 The Landscape Capacity Assessment for Sites on the Edge of Larger Villages in South Oxfordshire (LCapA) assessed sites on the edge of larger settlements to inform the Local Plan 2031, which included the promotion site and two of the comparison sites reviewed in this report: Land South of London Road (9) and Land South of Beech Road (10). A summary of the assessment results from the LCapA is recorded in the **Table EDP 2.1** below.
- 2.4

**Table EDP 2.1:** Summary of Assessment Results from Landscape Capacity Assessment for Sites on the Edge of the Larger Villages in South Oxfordshire

<b>LCA Assessment</b>	<b>Promotion Site (LCA site ref. WHE 2)</b>	<b>Comparison Site 9 (LCA site ref. WHE 15)</b>	<b>Comparison Site 9 (LCA site ref. WHE 17)</b>	<b>Comparison Site 10 (LCA site ref. WHE 13a)</b>
<b>Visual Sensitivity</b>	Medium/Low	Medium	Low	Medium/Low
<b>Landscape Sensitivity</b>	Medium/Low	Low/Medium	Low	Medium/Low
<b>Wider Landscape Sensitivity</b>	Medium	Medium/Low	Low	Medium
<b>Landscape Value</b>	Low	Low	Low	Low
<b>Landscape Capacity</b>	High	High	High	High

## Promotion Site

- 2.5 In relation to the promotion site, the LCapA assessed that in terms of visual sensitivity the site:
- *“Is not visually prominent;*
  - *Not visible from the north, though tall buildings in the higher ground in the north of the site would be visible from across the A40; and*
  - *No sensitive view receptors.”*
- 2.6 In terms of landscape sensitivity the promotion site has:
- *“Gently sloping site;*
  - *Hedgerows to all boundaries;*
  - *No cultural sensitivities;*
  - *Site affected by noisy road; and*
  - *More enclosed than is typical for the Open Farmed Hills and Valleys LT.”*
- 2.7 In terms of the wider landscape sensitivity, and the relationship of the promotion site with Wheatley and the wider countryside:
- *“Adjacent to settlement on southern and western sides;*
  - *Continuity with land to the east;*
  - *Severed from countryside to the north by A40; and*
  - *Part of gap between settlement and the A40.”*
- 2.8 The LCapA identified the following potential impacts on key settlement characteristics:
- *“Development of the site would reduce the gap between the main village and the modern, more scattered commercial/light industrial and retail development to the east; and*
  - *Development of the site would result in the loss of the gap between the village and the A40 (the gap is already filled further to the west).”*
- 2.9 The LCapA identified the following mitigation and contribution to the green infrastructure:

- *“Create new landscape structure to meet SOLCA requirements;*
- *Create new landscape structure to facilitate links with existing GI features such as the footpaths along the Thame River to the east of the site;*
- *Create new public rights of way linking to wider footpath network and help meet aims of the Wheatley Parish Plan; and*
- *Include new tree belt planting along the east of the site (unless WHE1 is developed) and include the area within the flood zone, while creating some pedestrian access through the southern boundary to link with the settlement.”*

2.10 The concluding recommendations of the LCA included:

- *“Contain housing within 'reduced area' as shown in Figure WHE2.2. – only the flood zone is omitted;*
- *Create new tree belt planting to contain housing and create a new countryside edge, to include the area of flood zone along the south edge of site;*
- *Retain and protect valuable native vegetation; and*
- *Preferred access off of Old London Road, utilising existing gate.”*

### **Landscape Related Designations**

2.11 As shown on **Plan EDP 2** the promotion site does not contain or fall within any designated landscape. The promotion site does however, lie within the Oxford Green Belt, which is protected by Section 9 of the National Planning Policy Framework (NPPF) and within the adopted Local Plan.

2.12 The three comparison sites also lie within the Oxford Green Belt, and the Land South of London Road (9), Land South of Beech Road (10) and Land off Littleworth Road (11) sites similarly are not subject to any landscape designations.

### **Other Relevant Considerations**

#### ***Heritage Matters***

2.13 With regard to heritage features, the site does not contain or lie in close proximity to any heritage assets.

2.14 The Land South of London Road (9) and Land South of Beech Road (10) comparison sites do not contain any heritage features, although a listed milestone (List UID 1369286) lies off London Road outside the north-west corner of the latter comparison site.

- 2.15 The eastern area of the Land off Littleworth Road (11) comparison site which bounds Kiln Lane and Westfield Road contains the north-western area of the Wheatley Conservation Area (CA). Within the CA there are two listed building properties which adjoin the eastern boundary of the comparison site: Grade II Listed Brookside and Grade II Listed The Old House.
- 2.16 The Grade 1 Shotover Registered Park and Garden (RPG) lies c.240m to the north of the Land off Littleworth Road (11) comparison site.

### ***Ecology Matters***

- 2.17 There are no statutory or non-statutory designations that lie within or in close proximity to the promotion site or any of the comparison sites.

### ***Tree Preservation Orders***

- 2.18 There are no Tree Preservation Orders (TPO) within the promotion site or in close proximity to it.
- 2.19 There are no Tree Preservation Orders (TPO) within any of the comparison sites or in close proximity to them, however any trees within the Land off Littleworth Road (11) comparison site which lie within the Wheatley CA will be subject to protection under this designation.

### ***Public Rights of Way***

- 2.20 There are no public rights of way (PRoW) within the promotion site. The nearest PRoW are footpath ref 251/11/10 c.200m to the east of the site, and footpath 251/8/10 c. 200m to the north of the promotion site, with the A40 road running between.
- 2.21 There are no PROW within any of the comparison sites. PRoW footpath ref. 407/5/40 adjoins the eastern boundary of Land South of Beech Road (10) and runs c.150m to the south-west Land South of London Road (9). The southern end of PRoW footpath ref. 407/8/10 meets the north-eastern corner of the Land off Littleworth Road (11) comparison site.

### ***Landscape Character***

#### ***South Oxfordshire Landscape Character Assessment (July 2003)***

- 2.22 A review of the South Oxfordshire Landscape Character Assessment finds that the Wheatley area lies within the Oxford Heights Character Area (CA). Within the CA the landscape around Wheatley there are a number of landscape types (LT) which are shown on **Plan EDP L3**.

- 2.23 The promotion site lies within the Open Farmed Hills and Valleys LT. The A40 road bounding the promotion to the north forms the boundary between this LT and the Semi-enclosed Farmed Hills and Valleys LT to the north of the road.
- 2.24 Comparison site Land South of London Road (9) also lies within the Open Farmed Hills and Valleys LT, whilst only the eastern edge of Land South of Beech Road (10) falls within this LT. The larger part of this comparison site and Land off Littleworth Road (11) lie within the Semi-enclosed Farmed Hills and Valleys LT.
- 2.25 The key characteristics of the Open Farmed Hills and Valleys LT are listed below:
- *“Rolling landform of hills and valleys;*
  - *Large-scale farmland, mostly in arable cultivation;*
  - *Typically large fields, with rectilinear pattern of field boundaries (predominantly hedgerows);*
  - *Weak structure of tightly clipped or gappy hedgerows, with few hedgerow trees;*
  - *Open, denuded and exposed character, with prominent skylines and hillsides and high intervisibility;*
  - *Distinctive elevated and expansive character on ridges and higher ground, with dominant sky and long views; and*
  - *Predominantly rural character but some localised intrusion of main roads (including M40/A40), overhead power lines and built development.”*
- 2.26 The key characteristics of the Semi-enclosed Farmed Hills and Valleys LT are listed below:
- *“As the [Open Farmed Hills and Valleys LT] but with a stronger structure of hedgerows and trees which provide clearer definition of field pattern;*
  - *Occurs mostly in association with settlements and steeper hillsides, where a smaller-scale field pattern and the hedgerow structure remain more intact;*
  - *Predominantly intensive arable land use but some pockets of permanent pasture occur, particularly around settlements and on steep hillsides;*
  - *Landscape typically fragmented and intruded upon by roads and built development, particularly around Wheatley and Oxford fringes, although it retains a predominantly rural character; and*

- *Landform and landscape structure create enclosure and reduce intervisibility but long views possible from hillsides and higher ground across lower-lying vales (eg. From Beckley towards Otmoor)."*

### **Review of Landscape Character and Visual Amenity**

- 2.27 The landscape character and visual amenity attributes of the promotion site are described and illustrated in **Appendix EDP 1**.
- 2.28 The landscape character and visual amenity attributes of the three comparison sites are described and illustrated in **Appendices EDP 2 to 4**.
- 2.29 The findings of the review of landscape character and visual amenity for the sites are summarised and discussed below.

### **Summary of the Performance of the Promotion Site in Landscape and Visual Matters**

#### **Landscape Matters**

- 2.30 The promotion site is broadly representative of the Oxford Heights CA, however in terms of characteristics and features it clearly occupies a transition zone between the Open Farmed Hills and Valleys LT and the Semi-enclosed Farmland Hills and Valleys LT. Although it lies within the 'open' landscape type as shown in **Plan EDP L3**, the site possesses a strong degree of enclosure due to the mature boundary trees and hedgerows, and also to a degree its hillside location which limits views to the north. It is only on the upper slope at the northern edge of the site that possesses a degree of openness from views looking south over the Old London Road boundary trees towards the ridgeline.
- 2.31 There are however urban influences on the otherwise rural character of this greenfield site. The negative influences of the A40 and pylons upon the landscape are recognised in the published landscape character descriptions of the local landscape types, and these are of particular relevance to this site, as illustrated in **Appendix EDP 1, Plates EDP 3 and 4**. Additionally, although the existing settlement edges to the south and west of the promotion site are strongly filtered by the site boundary vegetation, the wider Wheatley settlement which sits below the promotion site in a valley, is openly visible where views are available from the higher part of the site, as illustrated in **Plate EDP 2**. The Brookes University tower block to the north of the A40 is a notable urban feature in local views, and particularly in relation to the promotion site due to the closer proximity, as illustrated in **Plate EDP 1**. All the above urban features emphasise the urban edge context of the promotion site.
- 2.32 In summary of landscape matters, the promotion site is representative of the local landscape, although being bounded by the existing settlement edge on two sides and the A40 on a third results in urban influences, both visual and audible, being evident. The value of the landscape, in terms of its fabric and features, is relatively high by virtue of the presence of characteristic mature trees and hedgerows, although these are confined to the

boundaries. Such features, as advised through planning policy and general good practice, should be retained in any future development proposal, and given the strong enclosure of the site that they offer, there is the opportunity to provide an immediate mature landscape framework that will contain development and limit impacts upon the wider landscape character.

### **Visual Matters**

- 2.33 Due to the presence of mature trees and hedgerows on all boundaries of the promotion site, in combination with the hillside and edge of settlement location, the promotion site is not openly visible either from close proximity views on the settlement edge, or from the wider landscape.
- 2.34 Where filtered or partial views are available, the principal visual receptors would be limited to the following:
- Close proximity filtered views from Old London Road and its residential properties. The site will be more apparent in winter months when the filtering effect is at worst case scenario. During summer months when the trees are in full leaf the promotion site is largely screened in views;
  - Close proximity filtered views from a limited number of residential properties to the west of Waterperry Road;
  - Glimpsed close range views from vehicles travelling along the A40 through gap in boundary vegetation; and
  - The Public rights of way network across the ridge and hills to the south of Wheatley may have distant views across the settlement towards the promotion site due to its hillside location, however the site is not openly apparent due to tree screening, as illustrated in **Appendix EDP 1, Plate EDP 6**. There is the potential for ridgelines of buildings of the new development on the upper slope to be visible above tree canopies.
- 2.35 Beyond these receptors, there is the potential for views from within the wider settlement towards the hillside location of the promotion site, however development on the promotion site would be seen in the urban context of the existing settlement and Brookes University campus buildings.
- 2.36 In summary of visual matters, the site benefits from natural enclosure and is not visually prominent in the landscape. Thus, the site can accommodate development without significantly impacting on visual receptors. Due to its settlement edge location, if new development on the promotion site is visible it will be in the context of existing settlement which forms part of the visual character of the area and therefore will not be inappropriate, unexpected or discordant as part of the views.

### ***Opportunities and Constraints***

- 2.37 As discussed above, the promotion site possesses a high degree of enclosure and therefore is relatively unconstrained in visual terms, although there is the potential for ridgelines of new buildings on the upper slope to be visible above tree canopies. Masterplanning of any future development on the site should safeguard the influence on the wider countryside by locating development where it would not be visually intrusive and having regard to building heights in the visually sensitive parts of the site. This could be achieved on the site through incorporating an open space buffer on the upper slope inside the boundary to the A40.
- 2.38 Development of the promotion site should retain the mature landscape fabric where possible, as this contributes to the physical containment and representation of landscape characteristics.
- 2.39 With regard to the Green Belt, the proposed removal of the promotion site will still retain clearly defensible boundaries, due to the strong boundary vegetation enclosing the promotion site, and particularly on the eastern boundary, and the northern boundary to the A40 which provides a logical, permanent defensible boundary to Wheatley settlement, as it does already to the west of Waterperry Road.
- 2.40 The following opportunities should be considered in any development of this site:
- Reinforcement of eastern boundary as a defensible feature, through new native tree and shrub planting, particularly as the coniferous tree plantation to the east of the promotion site which currently provides a strong landscape and visual buffer cannot be relied upon as a permanent feature;
  - Enhancement and strengthening of southern boundary through new native shrub planting along the line of trees, increasing visual screening from London Road;
  - Enhancement and strengthening of the northern boundary with native tree planting within open space buffer to the A40, protecting amenity of future residents;
  - Masterplanning for new development to incorporate internal tree planting to break up the built mass of housing on the upper slope of the promotion site, reducing potential visual and landscape impacts; and
  - Open space along southern boundary incorporating creation of SUDs features where there is the potential risk of flooding.

### **Summary of the Performance of the Comparison Sites in Landscape and Visual Matters**

#### ***Comparison Site 9. Land South of London Road***

- 2.41 The landscape character of this site is influenced by its settlement edge and industrial development context which contain the site on three sides. The site itself is largely

characterised by scrub encroachment of grassland fields and contains detracting features including security fencing along Roman Road and the eastern boundary, pylons and other services degrade this landscape. There is an overall feeling of neglect. Lines of mature trees and internal scrub vegetation limit intervisibility and bring a sense of enclosure to the smaller fields. This site landscape is not in good maintained condition or representative of the Open Farmed Hills and Valleys LT.

- 2.42 In terms of visual amenity, the high degree of enclosure by settlement and trees/hedgerows strongly limits views of the main part of the site from the wider landscape. There is the potential for more distant views towards the site and the smaller southern portion south of it from hills to the south, although these views would be filtered by vegetation. The main site would be viewed in its existing urban context and the smaller portion seen to jut out. The visual receptors likely to be most impacted by any future development on the site will be the adjoining residential receptors to the west.

#### **Comparison Site 10. Land South of Beech Road**

- 2.43 In landscape terms, the small scale and pasture land use of the site, together with the rising hillside to the south bring a sense of enclosure to the valley which are representative of the Semi-enclosed Farmed Hills and Valleys LT. However, the site itself is characterised by only some boundaries with hedgerows and trees, whilst others are fenced and open to the urban edge or hillside to the south, so the site is not characterised by a strong sense of enclosure, but rather a sense of openness with the hillside landscape to the south – this hillside being a distinctive feature that forms part of the landscape setting to the village to the south. The urban edge strongly influences the character of the site. The site is moderately representative of the LT.
- 2.44 In terms of visual amenity, the landscape and settlement enclosure limits visibility of the site to the adjoining residential receptors who will have open views. There is a glimpsed view through the site field gateway from the adjoining PRoW farm track.

#### **Comparison Site 11. Land off Littleworth Road**

- 2.45 This site comprises two very different landscape parcels. The larger part of the site comprises open school playing fields, whilst the eastern part comprises enclosed landscaped grounds which are dominated by mature trees and closely associated with the existing settlement edge. In landscape terms the two areas of the site are not typically representative features of the rural landscape. It is only the treed boundaries that are strongly representative of the Semi-enclosed Farmed Hills and Valleys LT.
- 2.46 In terms of visual amenity, intervisibility with the wider landscape is limited due to the semi-enclosed nature of the landscape. There are no known views from PRoW and open views from roads are limited to Littleworth Road. There will be close range views from adjoining residential properties, although these are largely filtered by trees bounding or within the site.

*This page has been left blank intentionally*

## Section 3 Green Belt Review

### Introduction and Context

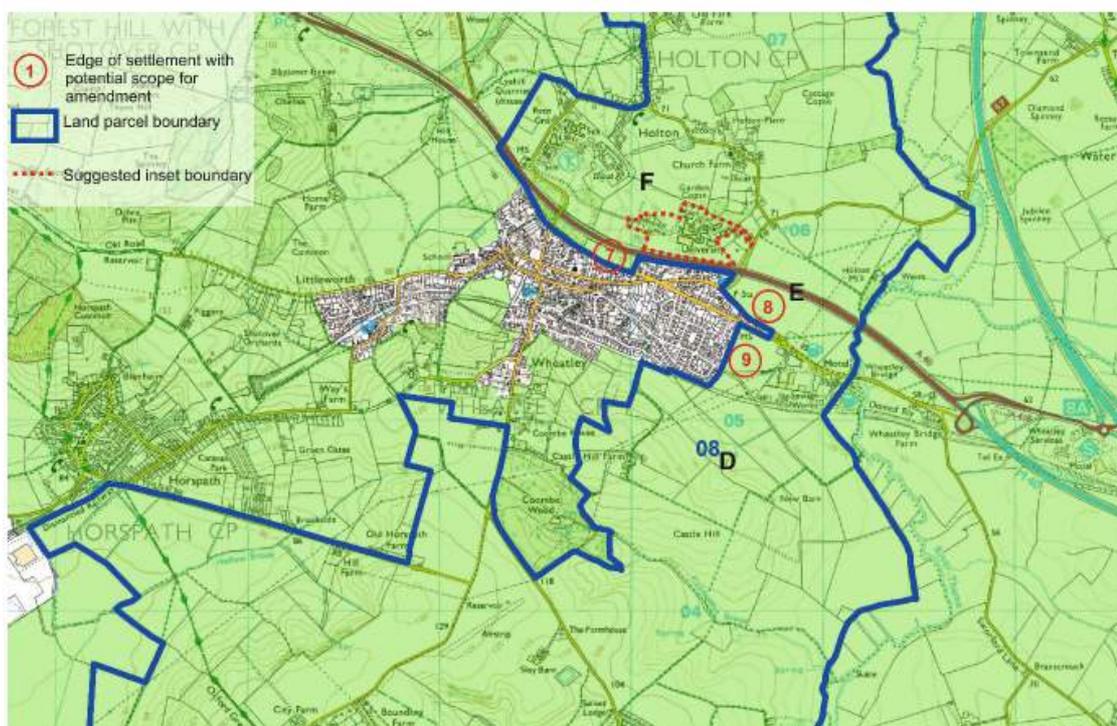
3.1 In 2014 South Oxfordshire District Council commissioned Kirkham Landscape Planning Ltd and Terra Firma Consultancy to prepare a Local Green Belt Study for South Oxfordshire District (LGBS) as part of the evidence base for the emerging local plan, which was published in September 2015. The study reviewed the land within the Green Belt against the five purposes of the Green Belt which included the promotion site and the three comparison sites reviewed in this Landscape Position Paper. The assessment criteria used in the LGBS is shown below in **Figure EDP 3.1**.

Criterion	Explanation
1. to check the unrestricted sprawl of large built-up areas;	Large built up area refers to Oxford. Land parcels should be assessed for extent to which they protect against contiguous development with Oxford City and prevent another settlement being absorbed into Oxford.
2. to prevent neighbouring towns merging into one another;	For this criterion, 'town' should be considered to be Wheatley currently inset to the Green Belt. Other settlements should be considered because South Oxfordshire District Council would not wish to allow these larger settlements to merge. These are Berinsfield, Clifton Hampden, Dorchester, Garsington, and Horspath.
3. to assist in safeguarding the countryside from encroachment;	This should look at the proximity of the land to existing settlements and the extent to which the land is contained by physical barriers such as roads, railways, watercourses etc. It should also give an overview of the landscape character of the land parcel and the extent to which it impacts on the open countryside.
4. to preserve the setting and special character of historic towns; and	This criterion refers specifically to the setting and special character of the city of Oxford and the impact of the land parcel upon that and should include any long distance views. It should include particular reference to the original designation of the Green Belt and the extent to which there have been any changes in circumstance.
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The use of previously developed land where available before greenfield land is a principle the Council follows across the district. Therefore it is assumed that all areas of the Green Belt contribute to this principle equally, and it does not need to be considered specifically as part of this study.

**Figure EDP 3.1:** Local Green Belt Study for South Oxfordshire District Assessment Criteria

3.2 Under the LGBS the promotion site lies within Area E 'Land between Wheatley and the A40', as shown in the map extract in Figure 3.2 below. In terms of preventing neighbouring towns merging, the study noted that Area E "*does not contribute to the separation of towns*" although it "*contributes to some extent to the separation of Wheatley and Holton*", and

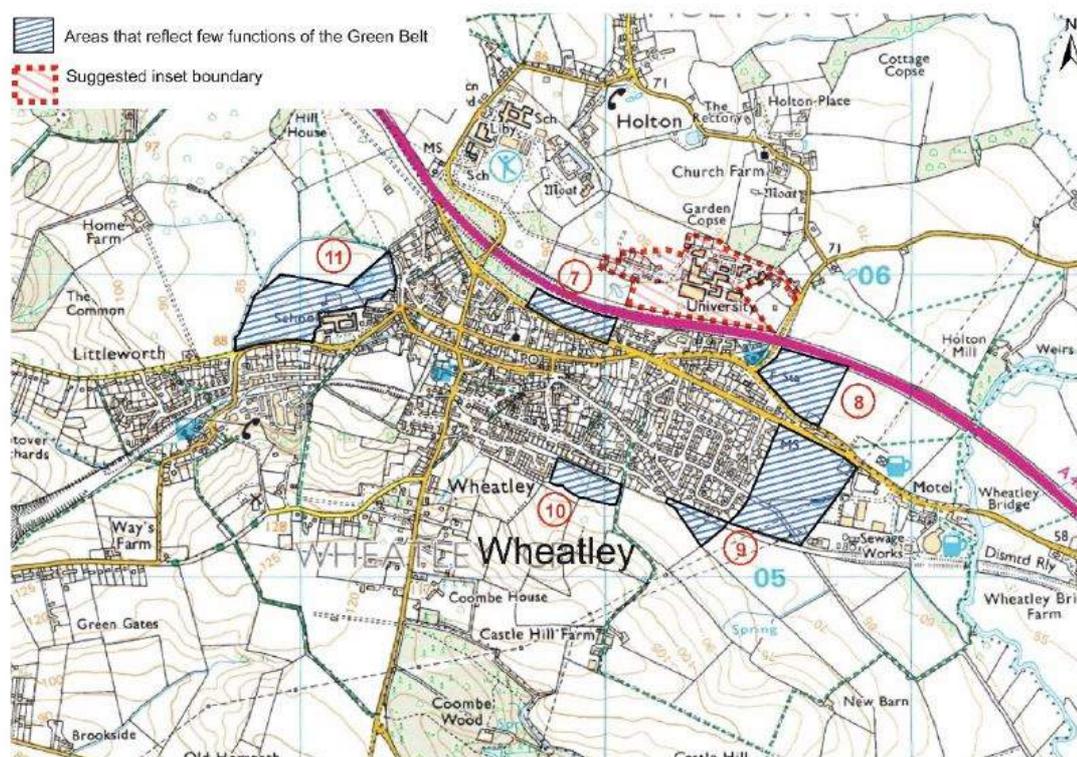
adding that “the main separation between the settlements is provided by the area of parkland, pasture and farmland to the north of the A40”.



**Figure 3.2:** Map extract of LGBC showing larger Green Belt parcels around Wheatley

- 3.3 The study noted with particular reference to the area of the promotion site that it is “surrounded on three sides by the settlement and A40 and has few essential characteristics of the Green Belt”.
- 3.4 In terms of the comparison sites, Land South of London Road (9) lies within Area D ‘Land to the south and west of Wheatley’ and is also described as possessing “few essential characteristics of the Green Belt”. In terms of preventing neighbouring towns merging, the study noted that Area D “does not contribute to the separation of towns” although it “contributes to some extent to the separation of Wheatley and Cuddleston to the south by providing open area of landscape between the settlements, however there is no intervisibility between the two settlements”.
- 3.5 Comparison Site Land South of Beech Road (10) lies within the area identified as Area D ‘Land to the North’ and is specifically described as “some small, well contained fields that relate well to the settlement and are not important to the function of the Green Belt”.
- 3.6 Comparison Site Land off Littleworth Road (11) lies within the area identified as Area C ‘Land West of Wheatley’ and is specifically described as “this area comprises school playing fields, is closely linked to the settlement, well contained by trees and has little connection to the wider countryside. There is the potential for including it within the settlement boundary”.

- 3.7 The LGBS suggested revised boundaries to the Wheatley settlement which would incorporate the promotion site and the three comparison sites reviewed in this report, as illustrated in the following plan extract from the published study in **Figure EDP 3.3**. It should be noted that Site 7 in the LGBS has already been developed and is therefore excluded from subsequent analysis.



**Figure EDP 3.3:** Local Green Belt Study for South Oxfordshire District Wheatley Suggested Changes Plan

### **EDP Green Belt Review (June 2017)**

- 3.8 This Green Belt Review has been undertaken to provide further, focussed appraisal of the extent to which the parcels identified by the LGBS perform against the purposes of the Green Belt, as defined in the NPPF, para. 80. It has been undertaken by a Chartered Landscape Architect, and follows an EDP assessment criteria and methodology (see **Appendix EDP 5**) designed to examine the purposes in further detail.

#### **Review Criteria**

- 3.9 As noted in the NPPF, paragraph 80, the Green Belt serves five purposes. For each NPPF purpose, criteria has been determined that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose is described in more detail below.

***Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas***

- 3.10 This is a test that considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development, but may also be piecemeal development in isolated areas or along settlement edges. A site may have already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.
- 3.11 Sprawl may also be discouraged by defensible boundaries that are either natural (e.g. topography, woodland, water course) or man-made features (e.g. as a road, railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries contribute towards greater openness.

***Purpose 2: To Prevent Neighbouring Towns Merging into One Another***

- 3.12 The wording of the NPPF refers to ‘towns’, but in the context of this assessment study area, the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges as well as distinct settlement areas that might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or ‘on the ground’ by intervening natural or man-made features.
- 3.13 The interpretation of ‘merging’, in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to ‘merging’ depends on the extent of openness between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

***Purpose 3: To Assist in Safeguarding the Countryside from Encroachment***

- 3.14 In terms of Green Belt, the ‘countryside’ is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks or isolated properties, or even larger areas of settlement.
- 3.15 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the visual context as described above in **Section 2**.
- 3.16 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than

land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.

- 3.17 The matter of 'encroachment' is also a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 3.18 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- 3.19 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

***Purpose 4: To Preserve the Setting and Special Character of Historic Towns***

- 3.20 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

***Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.***

- 3.21 The consultation exercise considers sites within the Green Belt as well as the redevelopment of urban land with the presumption in favour of development opportunities outside the Green Belt.

**Methodology**

- 3.22 EDP have developed a methodology for Green Belt Assessment, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.
- 3.23 The site is weighted against the criteria for each purpose as shown in **Appendix EDP 5**, with criteria weighted as limited, moderate or strong to reflect the contribution the site makes towards meeting the purposes of the Green Belt. Occasionally, weightings are spread if part of the site makes differing performances. This ensures that, whilst the NPPF

does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt, or retained within it.

- 3.24 The detailed findings are presented in the Green Belt Assessment Table in **Appendix EDP 6**.
- 3.25 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the Green Belt.
- 3.26 A summary discussion of the findings in relation to each of the first four purposes is provided below.

### Summary of the Performance of the Sites in terms of the Purposes of the Green Belt

**Table EDP 3.1:** Summary of EDP Green Belt Review

EDP Criteria	Promotion Site – Land off Old London Road	Site 9. Land South of London Road	Site 10. Land South of Beech Road	Site 11. Land off Littleton Road
<b>Purpose 1: To check the unrestricted sprawl of large built-up areas</b>				
Distinction between urban and countryside	Limited	Limited	Moderate	Moderate
Boundaries and openness	Limited	Limited	Strong	Limited
<b>Purpose 2: To prevent neighbouring towns merging into one another</b>				
Sinuous settlement edge	Limited	Limited	Limited	Limited
Affects gaps between settlements	Limited	Moderate	Limited	Moderate
<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>				
Affects key landscape characteristics	Moderate	Limited	Moderate	Limited
Extent of urbanisation	Limited	Limited	Moderate	Limited
<b>Purpose 4: To preserve the setting and special character of historic towns</b>				
Intervisibility with Historic Core	No	No	No	No
<b>Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>				
Is it in the Green Belt	Yes	Yes	Yes	Yes

- 3.27 This Green Belt review finds that all sites only perform moderately in terms of satisfying the functions of the Green Belt around Wheatley settlement. This would appear to support the

findings of the Local Green Belt Study for South Oxfordshire District which concluded that these sites possessed “*few essential characteristics of the Green Belt*”.

- 3.28 In terms of ranking the sites, Site 9. Land South of London Road and the promotion site have the weakest performances. For the Land South of London Road site, this can be attributed largely to the neglected condition, urbanising influences, and lack of key characteristics of the LT; its ‘indented’ location on the settlement edge; and the strong boundary provided by the strongly vegetated disused railway. However, the site straddles the disused railway, with the smaller parcel further south being contiguous with the Green Belt and has a greater degree of openness due to featuring less substantial boundaries. This corroborates with the LGBS.
- 3.29 Although Site 11. Land off Littleworth Road is in good managed condition, its land use as school playing fields and landscaped grounds; strong urban influence of the school buildings and bounding settlement edge on two sides; limited visibility to the wider landscape, together with very strong defensible boundaries (including tree-lined watercourse) that could form the realigned boundary of the Green Belt if the site were to be removed from the Green Belt, limit its contribution to the Green Belt. However, with the absence of a permanent urbanising feature such as road or settlement beyond the site, it clearly forms a contiguous buffer to the Green Belt.
- 3.30 Site 10. Land South of Beech Road performs strongest in terms of meeting the functions of the Green Belt, in particular restricting urban sprawl (Purpose 1) where it performs moderate to strongly, due to the lack of a continuous defensible boundary with the wider landscape, which in turn leads to a sense of openness and continuity with the semi-enclosed landscape. The overall weakness of its field boundaries, together with the influence of the adjoining open settlement on two sides, leads to the site being only moderately representative of the local landscape type and moderate contribution to safeguarding the countryside from encroachment (Purpose 3).

### **Performance of Promotion Site Against Green Belt Tests**

- 3.31 Considering the promotion site and the main functions of the Green Belt in slightly more depth, the findings are as follows:

#### ***Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas***

- 3.32 The promotion site is bounded on all sides by strong tree and hedgerow vegetation which brings a sense of enclosure to the promotion site, so that the openness in the sense of the visual relationship with the Green Belt is reduced considerably, or indeed in distant views from elevated viewpoints on the ridgeline and hills to the south. Development within this small field would not noticeably compromise the perception of the openness of the Green Belt in the wider area. The A40 dual carriageway forms a logical, permanent and defensible boundary for the Green Belt. The mature boundary vegetation around the promotion site will provide a defensible boundary and to the east, the existing tree belt can be further reinforced and strengthened.

***Purpose 2: To Prevent Neighbouring Towns Merging into One Another***

- 3.33 The promotion site is bounded by Wheatley settlement edge on two sides, and there is no intervisibility with other settlements. The A40 is closer to Holton and therefore development on the promotion site would not result in merging of these settlements.

***Purpose 3: To Assist in Safeguarding the Countryside from Encroachment***

- 3.34 The promotion site lies in a transitional landscape bearing some characteristic features that are representative of the local landscape type, but is also influenced by the urbanising features of the adjoining settlement and A40 which enclose the site on three sides. This ensures it is not perceived making a strong contribution to the wider small scale landscape.

***Purpose 4: To Preserve the Setting and Special Character of Historic Towns***

- 3.35 There is no intervisibility between the site and the Wheatley Conservation Area. Furthermore, there is existing, contemporary development within Wheatley that further reinforces the separation.

## Section 4 Conclusion

- 4.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Taylor Wimpey UK Limited (the 'client') to undertake a preliminary landscape appraisal and Green Belt review of a potential site for residential development at land off Old London Road, Wheatley, Oxfordshire (the 'promotion site') and three comparative sites, named as land South of London Road, land South of Beech Road, and land off Littleworth Road. The location of the promotion site and the comparative sites are shown on **Plan EDP 1**.
- 4.2 This landscape position paper finds that the promotion site is representative of the local landscape, although being bounded by the existing settlement edge on two sides and the A40 on a third, urban influences are evident. The value of the landscape, in terms of its fabric and features, is relatively high by virtue of the presence of characteristic mature trees and hedgerows. Such features, as advised through planning policy and general good practice, should be retained in any future development proposal, and given the strong enclosure of the promotion site that they offer, there is the opportunity to provide an immediate mature landscape framework which will contain development and limit impacts upon the wider landscape character.
- 4.3 Due to the natural enclosure of the promotion site it is not visually prominent in the landscape. Therefore, the conclusion by the SHLAA that the sloping nature of the promotion site should preclude development is not sufficiently strong. The promotion site can accommodate development without significantly impacting on sensitive visual receptors, although careful consideration of building heights is required. Due to its settlement edge location, if new development on the promotion site is visible, particularly on the upper slope, it will be in the context of existing settlement which forms part of the visual character of the area and therefore will not be inappropriate, unexpected or discordant as part of the views. Sensitive masterplanning design incorporating open space and internal tree planting offers the opportunity to mitigate visual effects of any future development.
- 4.4 The Green Belt review has considered how the promotion site and its features contribute towards the openness of the Green Belt and the potential to create a permanent boundary, should it be taken out of the designation.
- 4.5 This review finds that the promotion site makes a predominantly limited contribution to the purposes of the Green Belt, it being entirely divorced from the wider designation by a recognised, permanent boundary to the north and by an existing, recognisable landscape feature to the east. Urbanising features include the existing settlement edge on two boundaries, overhead services, the A40 which erode the sense of openness, when compared to the wider Green Belt.
- 4.6 NPPF para. 83 requires local authorities to consider the permanence of the new Green Belt boundaries. The promotion site benefits from having three permanent boundaries and only one 'short' but recognisable landscape feature forming the eastern boundary. All boundaries lie south of the A40 and would not extend the settlement further east than the

most eastern part of the village. The eastern boundary of the promotion site can provide a defensible boundary to the Green Belt, and with enhancement and reinforcement, will ensure the protection of the landscape setting of the River Thames valley to the east of Wheatley.

- 4.7 Sensitive masterplanning of future development on the promotion site can ensure the retention and protection of the existing tree and hedgerow features which provide some contribution to the perception of the transitional landscape between the Open Farmed Hills and Valleys and, the Semi-enclosed Farmed Hills and Valleys. Development should however be restricted from the full area of the more elevated portion of the promotion site, and instead siting of open space on the edges of the site would retain views to the ridgeline to the south. Internal tree planting will assist greatly in softening the appearance of development on the promotion site, by reinforcing its enclosed appearance and reducing the massing of buildings.

## Appendix EDP 1.1

### Promotion Site – Land Off Old London Road

<b>Promotion Site - Land off Old London Road</b> <b>Landscape Character and Visual Amenity Description</b>	
Key landscape features/condition and representativeness of the LCT	<ul style="list-style-type: none"> <li>• The promotion site lies within the Open Farmed Hills and Valleys LT. Hillside location with long views to ridge/hills to south from upper part of site, although restricted by boundary trees; intrusion of A40 and overhead powerlines, characteristic of this LT; and</li> <li>• Mature trees and hedgerows on boundaries give the promotion site a strong sense of enclosure which together with small pasture field are characteristics more representative of the Enclosed Farmed Hills and Valleys LT.</li> </ul>
Sub-urbanising influences	<ul style="list-style-type: none"> <li>• Settlement edge along Old London Road to the south, and to the west of Waterperry Road;</li> <li>• Brookes University tower block to the north-west;</li> <li>• A40 road to the north;</li> <li>• Overhead services along northern edge of the promotion site; and</li> <li>• Pylons and overhead cables to the east of the promotion site.</li> </ul>
Topography	<ul style="list-style-type: none"> <li>• The promotion site slopes down from north to south, forming part of wider rolling hillside landform.</li> </ul>
Views from Public Rights of Way	<ul style="list-style-type: none"> <li>• No PRoW within or bounding the promotion site;</li> <li>• Views from nearest PRoW footpath (200m to the north) screened by A40 buffer planting;</li> <li>• Views from PRoW to the east (including along the River Thames corridor) screened by intervening vegetation and site boundary hedgerow; and</li> <li>• The promotion site boundary trees largely screen views of the site from elevated viewpoints on hills to the south. Glimpsed views of upper area of the site possible between and over canopies of trees in SE and SW corners of the promotion site.</li> </ul>
Views from roads	<ul style="list-style-type: none"> <li>• Views into site from Old London Road filtered by boundary trees;</li> <li>• Views into site from Waterperry Road screened by road embankment and boundary vegetation; and</li> <li>• Glimpsed view into site through overhead services easement gap.</li> </ul>
Views from residential receptors	<ul style="list-style-type: none"> <li>• Close views from residential receptors off Old London Road filtered by southern boundary trees;</li> <li>• Views from residential receptors west of Waterperry Road filtered by site boundary hedgerow and other intervening vegetation; and</li> <li>• Potential partial and filtered views from more distant residential receptors within Wheatley, but these would be in the context of the settlement.</li> </ul>

**Promotion Site - Land off Old London Road**  
**Landscape Character and Visual Amenity Description**

Summary

- In landscape terms this site possesses a number of the key rural characteristics of the local landscape types, but it is also notably influenced by its location bounded by settlement to the south and west, and the A40 to the north. Retention and enhancement of the boundary vegetation will maintain the key defining landscape characteristic of the promotion; and
- In terms of visual amenity, the high degree of enclosure by boundary vegetation limits views into the promotionsite. Views from close proximity residential or road receptors are strongly filtered. There are no views from nearby PRow. There is the potential for more distant views towards the promotion site from the south, but it is largely screened by boundary vegetation with only glimpsed views of the upper part of the site above lower canopies.

## Appendix EDP 1.2 Promotion Site – Land Off Old London Road Photographic Plates Illustration Landscape Context



**Plate EDP 1:** Illustrating sense of site enclosure. View looking north-west across site towards western boundary hedgerow and prominent Brookes University tower block piercing the treed skyline



**Plate EDP 2:** Illustrating influence on site character of adjoining settlement to the south-west



**Plate EDP 3:** Illustrating northern boundary hedgerow containing site and gap view of adjoining A40 from site



**Plate EDP 4:** Illustrating strong eastern boundary hedgerow vegetation and off-site coniferous tree plantation and pylons



**Plate EDP 5:** Illustrating strong line of trees along southern boundary and views from upper part of site across trees towards ridgeline, giving reduced sense of enclosure



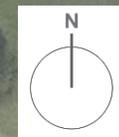
**Plate EDP 6:** View from PRoW 407/5/10 leading up to Castle Hill Farm looking north-west across Wheatley settlement towards the site which is not apparent due to tree screening

*This page has been left blank intentionally*

**Appendix EDP 1.3**  
**Promotion Site – Land Off Old London Road**  
**PLAN EDP L4 Landscape Character and Context**  
(EDP4048/06a 29 June 2017 HS/JM)

*This page has been left blank intentionally*

**Brookes University  
Wheatley Campus**



Brookes University tower block forms prominent built feature piercing the wooded skyline to the north-west.

Traffic noise, particularly from the A40 disturbs tranquility of landscape.

Views to the north contained by hedgerow buffer planting along the A40, except for overhead services easement gap in the north-east corner of the site which allows views of passing traffic.

Waterperry Road set down between road embankments as it descends under A40.

Old London Road

A40

Views of urban edge and Wheatley settlement with ridgeline backdrop over boundary trees from higher ground within site.

Views to the east contained by the site boundary hedgerow and trees, with coniferous tree plantation and other vegetation on adjacent site further screening views. Pylons and overhead cables feature above tree canopies.

Strongly filtered views towards urban edge to the south through mature boundary trees.

Mature trees and hedgerows create a general sense of enclosure around this small grassland field. Stronger sense of enclosure in the lower southern part of the site where views out are contained. Sense of enclosure reduced in the higher part of the site where views out are possible over boundary vegetation.

London Road

No intervisibility with the River Thames corridor 500m to the east.

Views towards ridgeline and pylons to the south from higher ground within site.

-  Site Boundary
-  Linear Tree Belt
-  Key Views
-  Filtered Views
-  Hedgerow

client  
**Taylor Wimpey UK Limited**

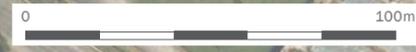
project title  
**Land off Old London Road, Wheatley**

drawing title  
**Plan EDP L4 Promotion Site: Landscape Character and Context**

date	29 JUNE 2017	drawn by	HS
drawing number	EDP4048/06a	checked	JM
scale	Refer to scale bar	QA	LH



@edp-uk.co.uk www.edp-uk.co.uk  
Cirencester 01285 740427 Cardiff 02921 671900 Shrewsbury 01939 211190



## **Land off Old London Road, Wheatley**

### **Arboricultural Position Paper**

#### **T\_EDP4048\_02 May 2017**

### **1. Introduction**

- 1.1 This Arboricultural Position Paper has been prepared by the Environmental Dimension Partnership Ltd (EDP) on behalf of Taylor Wimpey UK Ltd. It considers the arboricultural issues pertinent to any development of land off Old London Road, Wheatley (hereafter referred to as 'the site'). In doing so, this paper considers the arboricultural issues pertaining to the site's potential to accommodate residential development, and in doing so identifies opportunities and constraints that influence its deliverability and/or capacity in that respect.
- 1.2 The site is located on the eastern side of Wheatley, a small town situated around five miles east of Oxford city centre. It comprises a single semi-improved grassland field with an existing gated access located in the southern corner of the site. This access has become overgrown and the remainder of the site is enclosed by trees and hedgerows. The western and southern site boundaries adjoin Waterperry Road and Old London Road respectively, with residential properties beyond. The A40 runs the length of the north eastern boundary. A plantation of mixed woodland and rough grassland lies to the east of the site
- 1.3 The site measures approximately 3.4 hectares (ha) and is centred on approximately Ordnance Survey Grid Reference (OSGR) SP 606056. The local planning authority is South Oxfordshire District Council.

### **2. Methodology**

- 2.1 A walkover survey was undertaken on 04 May 2017, to provide a preliminary assessment of the tree stock at the site. The survey sought to identify all trees considered to be of high (category A), moderate (category B) and low (category C) value, based upon guidance set out in BS 5837:2012 Trees in Relation to design, Demolition and Construction.
- 2.2 The survey was undertaken using a GPS enabled tablet PC, which provides accuracy to within 0.5m. To assist in both the survey and future depiction of the tree population, the survey base mapping comprised composite Ordnance Survey data and high resolution aerial imagery.
- 2.3 All surveyed items are as noted on the Key Arboricultural Constraints Plan (**Plan EDP 1**) and are detailed in the tree survey schedule (**Schedule EDP 1**) included at the rear of this document.
- 2.4 All recorded items were allocated a unique reference number, with individual trees being given the prefix 'T', groups of trees the prefix 'G' and hedgerows the prefix 'H'.

- 2.5 Designated root protection areas (RPA) for each surveyed item have been calculated in accordance with BS 5837:201. The extents of these areas are depicted on **Plan EDP 1**.

### **Baseline Information**

#### *Tree Preservation Orders*

- 3.1 Consultation with South Oxfordshire District Council's online resources has confirmed that no tree preservation orders (TPO) are registered within the site, nor does any part of the site lie within or abut the boundary of a designated Conservation Area.
- 3.2 One off-site TPO (reference 18/1990 and named 53 London Road) has been identified, which formally protects a row of seven sycamore trees and is located on the south side of the Old London Road opposite the existing gated access. This TPO does not directly affect the site but is worth bearing in mind in relation to proposed access arrangements as any works to these trees would require a formal application to the council.

#### *Survey Results*

- 3.3 The survey process recorded four individual trees, five groups of trees and two hedgerows, totalling 11 items. Of these 11 items, two are classified as category A, of high quality and value; five are classified as category B, of moderate quality and value; and four as category C, of low quality and value. No category U items were identified.
- 3.4 A total of nine tree species are supported by the site; these comprise predominantly native and naturalised species typical of this semi-rural setting, with maple and hawthorn dominating the species hierarchy.
- 3.5 All of the surveyed items are located around the perimeter of the site and, providing that designated RPAs and canopies are respected, they do not adversely constrain the potential to accommodate residential development in the main body of the site.
- 3.6 However, it should be noted that G3 and G4, both category A items of high quality and value, are located along the south western boundary and as such will shade this area of this site.
- 3.7 The potential access will need to take into consideration the surveyed items and, from an arboricultural perspective, the location for this would be preferable to the south west corner of the site or the existing access to the south east corner of the site.
- 3.8 High-level masterplanning should seek to retain as many category A and B items as practicable and will need to respect the offsets as defined by canopy and designated RPA extents, along with shading cast by the items along the south western boundary.

- 3.9 Any future planning application should be informed further by a detailed tree survey based on topographic survey data. The current survey, which formed the basis of this position paper was conducted in such a way that it can be reconciled with topographic data and used as the baseline for further enhanced surveys in the future.

### **Conclusions**

- 4.1 The trees at the site are not subject to any TPO, and neither does the site fall within or abut a Conservation Area.
- 4.2 Overall, the site contains two category A trees of high quality and value and five category B items, of moderate quality and value. Both category A and B items should be prioritised for retention due to their condition, age and longevity.
- 4.3 All of the surveyed items are located around the perimeter of the site and, providing that designated RPAs and canopies are respected, they do not adversely constrain the potential to accommodate residential development in the main body of the site.
- 4.4 However, it should be noted that G3 and G4, both category A items of high quality and value, are located along the south western boundary and as such will shade this area of this site.
- 4.5 The potential access will need to take into consideration the surveyed items and, from an arboricultural perspective, the location for this would be preferable either in the south west corner of the site or using the existing access to the south east corner of the site.
- 4.6 Nonetheless, it is recommended that any future masterplanning exercise is informed by a detailed tree survey, based on topographic survey data and in full compliance with BS 5837:2012.

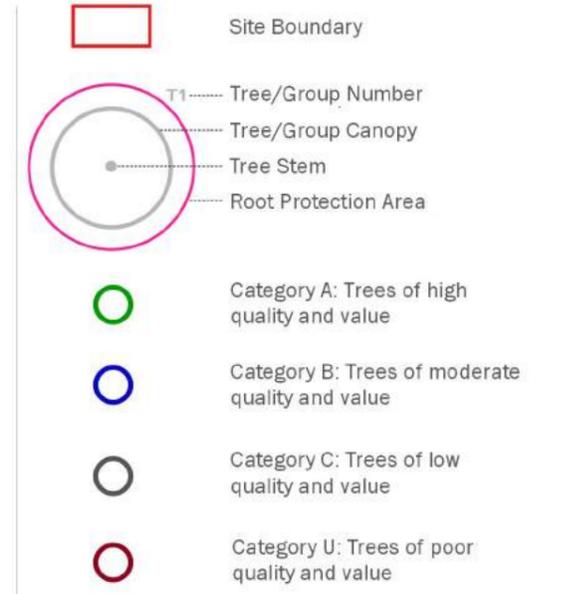


---

## Plan

### **Plan EDP 1**

Key Arboricultural Constraints  
(EDP4048/01 05 May 2017 LB/LT)



client	<b>Taylor Wimpey UK Limited</b>	
project title	<b>Land off Old London Road, Wheatley</b>	
drawing title	<b>Plan EDP 1: Key Arboricultural Constraints</b>	
date	15 MAY 2017	drawn by LB
drawing number	EDP4048/01	checked LT
scale	1:1,000 @ A3	QA LH



@edp-uk.co.uk www.edp-uk.co.uk  
 Cirencester 01285 740427 Cardiff 02921 671900 Shrewsbury 01939 211190



---

**Schedule EDP 1**

<b>Client:</b>	Taylor Wimpey UK Limited	<b>Site:</b>	Land off Old London Road, Wheatley
<b>Date of Survey:</b>	04/05/2017	<b>Consultant:</b>	Luke Tamblyn
<b>Tagged:</b>	N/A	<b>Weather:</b>	Clear and bright

Sequential Reference No.	Species	Height (m)	Stem Diameter (mm)	Branch Spread (m)				Canopy Clearance (m)	Life Stage	Physiological Condition	Structural Condition	Comments / Notes	Recommendations	Estimated Remaining Contribution (Years)	Category Grading	Priority
				North	East	South	West									
T1	Lime sp. (Tilia sp.)	12	550#	5	5	5	5	0	Mature	Fair	Fair	Access to inspect base - Restricted / obscured	No Work Recommended	20+	B1:2	N/A
G2	Hazel sp. (Corylus sp.);Hawthorn sp. (Crataegus sp.)	5	230#	3	3	3	3	0	Early Mature	Fair	Fair	Access to inspect base - Restricted / obscured; Boundary group	No Work Recommended	10+	C1:2	N/A
G3	Sycamore (Acer pseudoplatanus);Poplar sp. (Populus sp.)	18	490#	5	5	5	5	0	Mature	Good	Fair	Ivy or climbing plant; Deadwood - Minor; Large group mature roadside boundary trees	No Work Recommended	40+	A1:2	N/A
G4	Sycamore (Acer pseudoplatanus);Lime sp. (Tilia sp.)	13	450	5	5	5	5	0	Mature	Good	Fair	Roadside boundary trees	No Work Recommended	40+	A1:2	N/A
T5	Sycamore (Acer pseudoplatanus)	13	550#	5	5	5	5	0	Mature	Poor	Fair	Ivy or climbing plant	No Work Recommended	20+	B1:2	N/A
T6	Lime sp. (Tilia sp.)	9	340#	6	3	1	3	0	Mature	Fair	Fair	Fallen tree / trees - Partial collapse	No Work Recommended	10+	C1:2	N/A
H7	Field maple (Acer campestre);Sycamore (Acer pseudoplatanus);Birch sp. (Betula sp.);Hazel sp. (Corylus sp.)	6	200	3	3	3	3	0	Early Mature	Fair	Fair	Planted, unmanaged hedgerow providing beneficial screen	No Work Recommended	20+	B1:2	N/A
H8	Hawthorn sp. (Crataegus sp.);Bramble sp. (Rubus sp.)	4	200#	2	2	2	2	0	Mature	Fair	Fair	Utility clearance pruned; Providing beneficial screen from road	No Work Recommended	10+	C1:2	N/A
T9	Ash sp. (Fraxinus sp.)	14	500#	5	5	5	5	0	Mature	Fair	Fair	Off-site tree, all readings estimated	No Work Recommended	20+	B1:2	N/A
G10	Field maple (Acer campestre);Norway maple (Acer platanoides);Hawthorn sp. (Crataegus sp.)	11	260	4	4	4	4	0	Mature	Fair	Fair	Roadside highways planting, located on west facing slope	No Work Recommended	20+	B2	N/A
G11	Hawthorn sp. (Crataegus sp.);Elder sp. (Sambucus sp.)	4	150	2	2	2	2	0	Mature	Fair	Fair	Access to inspect base - Not possible; Access to inspect base - Restricted / obscured; Ivy or climbing plant; Unaged boundary group	No Work Recommended	10+	C1:2	N/A

**Sequential Reference Number** - T - Individual specimen; G - Group. Trees that form cohesive arboreal/cultural features either aerodynamically, visually or culturally; H - Linear group of specimens that form a hedge or boundary; W - A larger group or area of trees that should be regarded as a single woodland unit.  
**Species** - Common English names are used wherever possible for simplicity.  
**Height** - An approximation of height (in metres) is provided for the highest point of the tree.  
**Stem Diameter** - This is the measurement of stem diameter in millimetres taken in accordance with Annex G of BS5837:2012. # - estimated  
**Branch Spread** - This is taken at four cardinal points, with a stated value in metres to enable an accurate representation of the crown  
**Existing Height Above Ground Level** - An approximation of height (in metres) of crown clearance above adjacent ground level.  
**Life Stage** - There are five classes to which trees are assigned: Young; Early Mature; Mature; Over Mature; Veteran.  
**Physiological Condition** - An indication of the tree's physiological condition is represented and classed as good, fair, poor or dead, this is informed by the following: Canopy Density: It should be taken that, unless otherwise stated with each individual entry, the canopy density of the trees is typical of the species; and Leaf Size and Colouration: It should be taken that, unless otherwise stated with each individual entry, leaf size and colouration is typical of the species.

**Structural Condition** - Additional notes are provided giving details of the tree's structural condition. This is informed by "the presence or any decay and physical defect".  
**Interim Management Recommendations** - These are made on the basis of optimising the life expectancy of site trees, given their current situation and that which may result from the development proposals. The survey process pays particular attention to implications for life and/or property; defects recorded under the structural condition have the necessary mitigation measures proposed within this section of the schedule.  
**Estimated Remaining Contribution** - The definitions of the terms used are as follows and describe the estimated length of time (in years) over which the tree can be expected to make a safe contribution to local amenity: Less than 10; 10+; 20+; and 40+.  
**Category Grading** - Trees have been assigned 'U' or Category Grading 'A' to 'C' in accordance with the Cascade Chart given in BS5837:2012.  
**Tree Works Priority Codes** - Priority codes from 1 to 3 have been given for trees requiring work. The definition of the codes used is as follows: Priority 1: Work that should be undertaken urgently due to the identification of a potential hazard; Priority 2: Work that should be undertaken prior to any works commencing on site; and Priority 3: Work that should be undertaken following the completion of the development.

# Response 15

## Respondent Details

[Redacted]

[Redacted] [Redacted]  
[Redacted] [Redacted]  
[Redacted]  
[Redacted] [Redacted]

Q1. Are you completing this form as an:

Organisation

## Your comments

Q2. You can provide your comments on the Wheatley Neighbourhood Plan Review below. When commenting, you should bear in mind that the examiner will mainly assess the plan against the 'basic conditions', which are set out in the Basic Conditions Statement. If you are commenting on a specific section or a supporting document, please make this clear. After this publicity period consultation, the opportunity for further comments will be only at the request of the examiner. If you wish to provide evidence and any supporting documents to support or justify your comments, there is a facility to upload your documents below.

Please see attachment.

Q3. You can upload supporting evidence here.

- File: Wheatley Reg 16 SODC Comments.pdf [Redacted]

## Your details and future contact preferences

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

Title -

Name [Redacted]

Q8. After the publicity period ends, your response will be sent to an independent examiner to consider. As the neighbourhood planning process includes an independent examination of the plan, your name, postal address and email (where applicable) are required for your comments to be considered by the examiner. The opportunity for further comments at this stage would only be at the specific request of the examiner. All personal data will be held securely by the council and examiner in line with the Data Protection Act 2018. Comments submitted by individuals will be published on our website alongside their name. No other contact details will be published. Comments submitted by businesses, organisations or agents will be published in full, excluding identifying information of any individual employees. Further information on how we store personal data is provided in our privacy statement.

<b>Job title (if relevant)</b>	Planning Policy Officer (Neighbourhood)
<b>Organisation (if relevant)</b>	South Oxfordshire and Vale of White Horse District Councils
<b>Organisation representing (if relevant)</b>	-
<b>Address line 1</b>	Abbey House
<b>Address line 2</b>	Abbey Close
<b>Address line 3</b>	-
<b>Postal town</b>	Abingdon
<b>Postcode</b>	OX14 3JE
<b>Telephone number</b>	-
<b>Email address</b>	██████████@southandvale.gov.uk

Policy and Programmes



Listening Learning Leading

**Contact officer:** [Redacted]

[Redacted]@southandvale.gov.uk

Tel: 01235 422600

07/03/2023

**Wheatley Neighbourhood Development Plan – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)**

South Oxfordshire District Council has worked to support Wheatley Parish Council in the preparation of their neighbourhood plan and compliments them on a very thoughtful, comprehensive and well produced plan review.

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Wheatley Neighbourhood Development Plan (NDP) during the pre-submission consultation. We note that the qualifying body has taken the council's advice on board and addressed a number of the concerns previously raised.

We are committed to helping this plan succeed. To achieve this, we offer constructive comments on issues that are considered to require further consideration. To communicate these in a simple and positive manner; we produced a table containing an identification number for each comment, a description of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view on whether the draft plan meets the basic conditions.



**Planning Policy Officer (Neighbourhood)**

Ref.	Section/Policy	Comment/Recommendation
1	General comment on policy numbering	It would be beneficial for the readability and use of the plan if the paragraphs are numbered consistently. At present, several paragraphs throughout the plan do not appear to have been given a unique number.
	Paragraph 4.8	The sentence beginning on line 8 of this section should read " <i>The District council requires affordable housing contributions where there is a net gain of 10 or more dwellings, in line with national policy and guidance</i> ". (Amendment required from 11 to 10). This requirement is accurately reflected on Policy H3 (page 36), stating "Development proposals with a net gain of ten or more dwellings (Use Class C3) or where the site has an area of 0.5 hectares or more should deliver 40% affordable housing". For consistency, it is advised that paragraph 4.8 is revised to accurately reflect requirements throughout.
	Page 44 - Figure 8.6	This map could be enhanced by ensuring that the information shown is clear and that all of the layers listed in the key are visible. Making these amendments would bring this map in line with the Basic Conditions which require a neighbourhood plan to be clear and unambiguous. SODC would be happy to assist with this.
	Page 45 – Policy HE1: Historic Environment	We note this policy is the same as that in the made Wheatley Neighbourhood Plan and is broadly consistent with the NPPF and our local plan policies. However, we feel that the wording could be improved to create a better link to development by including a trigger for when the policy should be applied. We suggest that prefacing the first paragraph with ' <i>In the determination of planning applications....</i> ' would enhance the policy and ensure that it serves a purpose when considering development proposals. Additionally, a reference to the NPPF requirement to take a balanced approach to the determination of applications relating to heritage structures would also be welcomed.
	Page 46 – WHE25, the OBU site	The information regarding the OBU Wheatley Campus site is no longer accurate and should be amended to remove confusion. As of the time of submission, a large part of the OBU Wheatley Campus site vacant; however, a small section is still in use by OBU. The wording of the first sentence of paragraph 9.3 should therefore be amended to state ' <i>OBU is intending to fully vacate the current Wheatley Campus site in the future and the site is currently</i>

Ref.	Section/Policy	Comment/Recommendation
		<i>subject to an outline planning application for up to 500 dwellings.'</i>
	Page 50 - Figure 10.3	This map could be improved by further distinction between the existing green belt boundary and the newly proposed boundary. Making these amendments would bring this map in line with the Basic Conditions which require a neighbourhood plan to be clear and unambiguous. SODC would be happy to assist with this.
	Page 51 – Figure 11.1	The Green Route and WNP Boundary identified on the key are either missing or difficult to identify on the map itself, this should be rectified. Making these amendments would bring this map in line with the Basic Conditions which require a neighbourhood plan to be clear and unambiguous. SODC would be happy to assist with this.
	Page 67 – 15 References	Several of the references are not correct or accurate enough, for example references to the Local Plan or NPPF are not always to the most up to date version. We would welcome the examiner's recommendation to make factual updates where appropriate.