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**Director for Planning and Place  
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**30 June 2017**

Wheatley Neighbourhood Plan Committee  
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Attn: John Fox, Chairman

Dear Wheatley Neighbourhood Plan Committee

**Wheatley – Pre-Submission Draft Neighbourhood Plan (consultation to 30/6/17)**

Thank you for the opportunity to comment on your draft Neighbourhood Plan.

The County Council has a number of statutory duties and responsibilities which may impact on the preparation of Neighbourhood Plans. These roles and responsibilities include ensuring that roads, schools and public transport are provided where possible to support new and existing development. We also play a significant role in securing new, and maintaining existing, infrastructure.

We are particularly interested in the proposals for the Oxford Brookes University site as the main strategic site allocation, in relation to infrastructure and bus services. Our attached comments set out some issues of importance for us. We note that the draft neighbourhood plan area does not cover the entire Oxford Brookes University site and wonder whether the area needs to be amended given that the university are proposing to redevelop the entire site.

We look forward to further discussion as your plan-making progresses. We have prepared these officer comments in good faith but these do not restrict our ability to raise matters at the formal Submission stage of your Neighbourhood Plan.

Yours sincerely

*Lynette Hughes*

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## **Attachment to Letter on Wheatley draft Pre-Submission Neighbourhood Plan June 2017**

### **Policy and Strategy**

#### Oxford Brookes University (OBU) Campus

Ref Policy SP2 (WHE25). This is a strategic allocation which is also included in the Local Plan Second Preferred Options. Our comments on the Local Plan drafts, which address the Green Belt designation, are copied at the end of this comment. We note that the proposed allocation in the draft Neighbourhood Plan differs in some ways from that in the current draft Local Plan, and does not cover the entire site. We note also that the university (as owner) has made submissions on the draft Local Plan and will no doubt make comment on this draft Neighbourhood Plan. The vision in this draft neighbourhood plan HL3V and policy SP2 seeks mixed use redevelopment of the built up area of the Oxford Brookes site for 300+ homes and premises for new/relocated existing businesses through the identification of land for housing and reuse of serviceable buildings as business/residential units. We are aware, further to the public exhibition on 20 June 2016, that the current proposal by the owners is for some 600 houses, no business and no retention of any buildings on site. At the time of writing, this is publicly available on: <http://www.brookes.ac.uk/space-to-think/news-and-events/comments-welcome-on-the-future-development-of-wheatley-campus/>. We recommend that the Neighbourhood Plan group discusses the matter with South Oxfordshire District Council and other interested parties so that the allocations are aligned.

#### Wheatley Parish and Holton Parish

The neighbourhood plan area includes all of Wheatley Parish and a part of Holton Parish (the area identified as being the built up part of the Oxford Brookes site). Whether or not the boundary is amended, the neighbourhood plan should positively address the relationship with the village of Holton as well as the village of Wheatley.

#### Proposed relocation of businesses

The draft Neighbourhood Plan takes a long term approach to development and aspires to a number of land swaps to enable more housing within the village and relocation of businesses to the Oxford Brookes site or the eastern end of the village if land is removed from the Green Belt. We understand this approach has been applied successfully in the village before with the relocation of businesses generating significant HGV movements to land adjacent to Asda, but it is questionable whether the proposals would be financially viable, particularly if further employment around Asda would require relocation of a number of existing homes.

#### CIL

We understand that there is no current exclusion for this site in the CIL Charging Schedule and the Regulation 123 list limits what can be sought regarding S106 contributions. We will seek to work with the District Council on a review of the CIL Charging Schedule.

## Transport Strategy

### Proposed Village Transport Study

Ref para 8.16. A possible future study in collaboration with County Highways is referred to. The aims of the study and aspirations for Wheatley referred to in Paragraph 8.16 are appreciated, and the county council will be able to provide some advice: however there is no funding from the authority for such a study so this would need to be funded through alternative means. Any measures identified would also need funding, likely to be from the parish's part of CIL, although possibly also Section 106/Section 278 arrangements subject to the appropriate regulatory tests.

We note that the suggested study is a local one to develop schemes to manage and mitigate traffic flow the village. Consideration could be given to whether a study should also understand the implications of the proposed Oxford-Cambridge Expressway, especially if a southern route is chosen as this would change the traffic dynamics of this area of South Oxfordshire.

There is reference in sub-paragraph 'e' to electric buses. The specification of electric/hybrid buses is unlikely to be affordable as significant benefit would only be generated by re-equipping the route wholesale: the required resource is likely to mean the allocation of over ten vehicles to it. However it should be noted that vehicles entering the city centre on all but the least frequent services are expected to attain certain emission standards anyway (currently Euro V, but with likely future revision). It is therefore arguable that this could be removed from the list of study elements and replaced with 'to promote use of public transport in Wheatley'.

The study could look at issues resulting from HGV access, which is referred to in numerous locations throughout the Draft Neighbourhood Plan. Although the suggested additional restrictions on HGV movements are noted, enforcement is key to ensuring compliance. The Neighbourhood Plan group is advised that there is a method for reporting observed contraventions of HGV restrictions, via the 'lorry watch' facility at: <http://freightgateway.co.uk/oxfordshire/>.

### Public Transport

Ref Para 3.2.1. Wheatley is currently well served by public transport, with the frequent 280 and U1 services the primary routes benefiting the village. The observations on the withdrawal of the 103/104 services (which provided a direct link to employment sites and shopping facilities from Wheatley as well as providing Littleworth's only bus service) are noted, as is the comment on the likely withdrawal of the U1 service when the campus site closes.

It is the County Council's intention that developer contributions would be sought to support bus services upon any application for a strategic development such as that proposed at Wheatley Oxford Brookes. These contributions could potentially support additional services on a 'pump priming' basis. Pump priming provides initial support while occupations at the site are at a minimal level but anticipates eventual commercial viability of the bus service once the development is fully built out.

The County Council has experience of seeking pump priming contributions, for example at Barton Park in Oxford City where a significant site was not on the commercial bus network (as will be the case here once the existing U1 service ceases). The County would calculate how many buses are needed for a service of an agreed specification, and would expect the commercial operators would then put forward their best offers, which will probably be a variation of or extension to existing commercial bus services in the area. It is expected that the road through the site will be suitable for bus operation so buses can enter from either west or east and can pass through.

## Pedestrian and Cycle Links

Ref Para 3.2.3. Although the suggested improvements to footway provision are noted, funding sources may be a concern. Development may be able to fund some improvements via Section 106 contributions or Section 278 (direct delivery) arrangements where the relevant regulatory tests are met. Alternatively, the parish council may consider whether this is a matter that could be funded through use of the parish's part of CIL.

In some locations (particularly where roads are narrow) the addition of footpaths may be impractical in terms of maintaining required carriageway widths. This may preclude a footpath linking Wheatley with surrounding villages as referred to in Para. 3.2.4. That said, where suggested improvements such as the pedestrian crossing across Station Road/Ladder Hill directly correlate to a potential development site (in this case the former 'Railway' public house) provision would appear to have greater potential.

Ref TT201: 'Provide new and improved pavements throughout Wheatley'. It is not clear how this will be funded and there may be limited scope for reduced carriageway widths to accommodate new footways in many locations.

Ref TT204: 'Provide a new pedestrian link to OBU which will include a new pedestrian and cycling bridge for safe and practical access to the village centre'. This facility is likely to be of benefit largely to residents of new development on the current Oxford Brookes University Campus site. We are supportive of this proposal, to ensure integration and access to services and facilities and encourage walking and cycling, but are unclear at the present time on practicalities and funding.

## Air Quality

Ref paras 3.28 to 3.31. The observations on NO<sub>2</sub> levels in the village are noted. It is understood that an annual mean NO<sub>2</sub> level of 40 micrograms per cubic metre would trigger the imposition of an AQMA in the village. The concern over air quality, the suggestion of monitoring continuing until 2032 and the suggestion of new monitoring sites is noted, especially given the prospect of significant additional development. South Oxfordshire District Council is the authority in charge of air quality: as a result the potential designation of an AQMA and measures to improve air quality should be discussed with them.

We note that at this stage no AQMA is proposed and a general downward trend in NO<sub>2</sub> levels (albeit incremental) is observed from 2011 onwards. The aspirations within the draft Neighbourhood Plan to improve infrastructure for sustainable modes of travel such as walking and cycling and to improve bus services may lead to reduced car use and, as a consequence, help to improve air quality: however the suggestion that additional parking in the village centre is sought may potentially offset this by making continued/increased car use attractive.

## Car Parking

Ref TT102: 'Enhance parking management and provision'. It is assumed that this objective refers to parking in and around the village: if so the potential funding required for such improvements, the availability of sites and the issue of enforcement should all be considered with regard to any proposals. Objective RS103 under 'Retail Services' is subject to the same comments. Expectations of what may be achievable given limited availability of suitable land close to the village centre (as observed in paragraph 7.2) and in addition to existing facilities at the Merry Bells, Church Road (to rear of the 'King and Queen' and in front of the shops on High Street) should be realistic.

Ref Policy P1: Parking Provision (p34). South Oxfordshire District Council's parking standards and SODC's and Oxfordshire County Council's residential design guides will be used to assess the suitability of any parking proposed within development sites.

#### Proposed allocation of former 'Railway' public house, Ladder Hill

Ref Policy SP1 (WHE18). This is a relatively small allocation of a 0.53ha site which is not in the Green Belt, for retirement housing. We have no strategic transport comments.

#### Proposed allocation of Oxford Brookes University site

Some strategic comments are provided earlier in this comment. We make some comment on the specifics of transport matters raised in the draft Neighbourhood Plan (ref Policy SP2) as follows:

- The pedestrian, cycle and highway improvements that the County can require will be restricted by regulatory tests.
- A policy cannot require that the new development have no greater impact than the existing development as that is not the relevant test as set out in the National Planning Policy Framework. The transport impacts from the development would be expected to be reported within the Transport Assessment and assessed by the County Council as highway authority with regard to whether suitable mitigation for any impact is proposed.

#### Contingency Site Area

Ref Policy SP3. Our comments on the proposal in the Local Plan Second Preferred Options for some land to be removed from the Green Belt are copied at the end of this comment. We note that those sites, to the east of the village, are quite a long way from village facilities, especially the primary and secondary schools, which may give rise to an increased proportion of car trips over that which is more centrally based. We note that the draft Neighbourhood Plan does not propose general housing in this area, but note that there would need to be strong grounds for objecting to any proposals for general housing if land is removed from the Green Belt.

### **Archaeology**

The plan does not contain any policy for the protection of the Historic environment as set out in the NPPF. We would recommend that a policy for this is added to the Quality of the Environment and Natural Landscape section such as that following.

#### *Policy - Historic Environment*

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2012).

## **Education**

### Capacity of the primary school

As advised in our comments to the Local Plan both in August 2016 and May 2017 (copied below) we expect that Wheatley Primary Academy will have the capacity to accommodate development of around 300 extra houses in Wheatley. We are concerned about how additional development will be catered for.

We note that para 3.13 does not detail this concern, stating only that 'Wheatley Primary Academy has accommodation for further pupils'. The primary school's capacity is 420 pupils and it currently has 348 pupils on roll (January 2017 pupil census).

As the school is already a 2FE school, it would need to grow to 2.5FE or even 3FE to cater for additional levels of development. This would make it larger than most primary schools in Oxfordshire.

As an academy, the capacity of the school is set by its funding agreement and would need DfE approval to be altered.

### Redevelopment of the primary school

Paragraph 8.17 and Policy SC11 refer to the possibility of redeveloping Wheatley Primary for educational use to include provision of a new village hall. Such a proposal for additional uses is of concern given the possibility that additional land will be needed for the primary school to expand. It is also not clear how such a proposal would be funded. It should also be noted that any building on academy playing fields requires DfE approval.

Paragraph 7.12 notes that if land to the east or west of the primary school becomes available for redevelopment, then priority should be given to education, community/sports facilities and housing for the elderly. We would note that education should be the highest priority of these.

Paragraph 8.31 says: 'The expertise of the organization Low Carbon Hub, a promoter of community energy initiatives working in partnership with Oxfordshire County Council and Oxford City Council, will be utilised, exploring the possibility of carrying out a schools photovoltaic project financed through the issue of community shares'. Contact should be made with our Property department about any such proposal.

### Capacity of the secondary school

Wheatley Park School's capacity is 1330 pupils and it has 1005 pupils on roll (January 2017 pupil census). Para 3.13 states that 'Wheatley Park, with 1019 pupils on roll in March 2016, believes it has accommodation for 180 more pupils; Ofsted disputes this and suggests a figure of 330 more places'. This statement could be updated i.e. at January 2017 it had capacity for 325 more pupils across the age range.

It is expected that Wheatley Park would be able to accommodate the suggested levels of growth in the village.

As this school is also an academy, the capacity is set in the funding agreement and would need DfE approval to be altered.

## Public Health

The plan confuses the concept of 'public health' with health care services. On page 8 the section entitled 'Public Health' refers to fixed infrastructure and services required to treat and care for individuals when they become ill (health care services) rather than interventions intended to influence the entire population to make healthier choices (in order to prevent disease even when people are not ill). We strongly recommend that this section is re-titled to something like 'Health Care'. An overview of current data on the health and wellbeing status of people living in Wheatley can be found using Public Health England's Local Health tool:

[http://www.localhealth.org.uk/GC\\_preport.php?lang=en&s=166&view=map11&id\\_rep=r03&sellid\\_0=6489&nivgeo=ward\\_2015](http://www.localhealth.org.uk/GC_preport.php?lang=en&s=166&view=map11&id_rep=r03&sellid_0=6489&nivgeo=ward_2015)

Oxfordshire's Joint Strategic Needs Assessment (JSNA) provides information about Oxfordshire's population and the factors affecting health, wellbeing, and social care needs and includes a section on the natural and built environment. A summary highlighting any data that is relevant to built environment interventions could form the basis for a 'Public Health' section.

<http://insight.oxfordshire.gov.uk/cms/joint-strategic-needs-assessment>

Although the majority of the plan's visions and objectives have direct health implications none overtly make the case for development maintaining or improving the health and wellbeing of people living, working and visiting Wheatley. The Oxford Brookes site in particular provides an opportunity to integrate public health objectives into the site masterplan to improve future population level health outcomes. Similarly, whilst we welcome the recognition that strategic planning has a role to play in tackling anthropogenic air pollution, and particularly that generated by motorised traffic, overtly including health and well-being in the overall aims and objectives would reinforce the need for development that minimises exposure to and where possible reduces air pollution. Key public health points to consider including within the visions and objectives and highlighting in the policies that follow would include encouraging the development of an environment which:

- *provides opportunities for people to be more active* – this could be used to reinforce the vision TT2V that “the village centre, all schools and leisure facilities will be safely accessible by walkers, cyclists and the elderly and infirm” and specific objectives to improve the local walking and cycling infrastructure as set out in TT201-4. With improving physical activity rates and reducing traffic generated air pollution in mind, we recommend that consideration is also given to including an objective promoting active travel as the first-choice mode of transport for local journeys within Wheatley. In addition to maximising the integration of new development, such as the desire for a pedestrian and cycle bridge from the OBU site, other specific references could be made to make the case for active travel routes to neighbouring settlements (particularly Oxford) and from peripheral carparks to schools and other amenities that could be used for 'park and stride' initiatives. This provision could also be used to support the need for publically accessible open space, green infrastructure, recreation grounds and design considerations, such as permeable street layouts that avoid cul-de-sacs.
- *provides opportunities to make healthier food choices* - this could be linked to the need to support local shops and retain/expand allotment provision.
- *fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness* – this could be used to make the case for multi-functional community facilities, green infrastructure and public realm. In addition to helping to maximise potential for physical integration between the existing fabric of Wheatley and new development sites, creating spaces that bring people together will support mental wellbeing/community spirit. Creating an environment that allows people to be more active will also protect and enhance mental health and wellbeing.

- *enables people to maintain their independence for longer* - this could be used to reinforce the desire for “a balanced range and quantity of housing that meets the needs of both current and future residents of all ages” and make the case for new builds that meet ‘lifetime homes’ standards. It would also support the need for locally accessible amenities and services, and public realm that considers the needs of older people, such as step free access, publically accessible WCs, regularly spaced benches and the replacement of footpath styles with accessible gates.

The above are supported by NPPF paragraphs 7, 35, 50, 69, 156 and the PPG ‘Health and Wellbeing’ chapter.

## **Natural Environment**

The Plan makes a number of helpful references to biodiversity, landscape and green infrastructure. These references could be strengthened in a number of ways, outlined below.

A more detailed description of the environmental features and wildlife that are important within the neighbourhood plan area could be provided. An annotated map would be helpful in this respect, including features in adjoining parishes that may be relevant to the development in Wheatley. Examples include the Shotover Conservation Target Area (CTA), Local Wildlife Sites and areas of potential Priority Habitat, in addition to existing Site of Special Scientific Interest. The District Council or Thames Valley Environmental Records Centre may be able to provide further information on habitats and species of importance in the area. Where development may have an impact on these known features the NP should be clear that this has been taken into account. For information on CTAs visit:

<https://www.wildoxfordshire.org.uk/biodiversity/conservation-target-areas/>.

To reinforce the wish to protect and enhance biodiversity, Policy EN1 which seeks a net gain in biodiversity could usefully be applied in other sections, for example in the design briefs for the major development sites.

The importance of green infrastructure in personal and community wellbeing is increasingly recognised - for example in reducing air pollution, improving physical activity and mental health. This could be strengthened within the neighbourhood plan by cross referencing to the role of green infrastructure in a range of sections and policies including transport, housing, flooding, leisure etc. The emerging Green Infrastructure Strategy for South Oxfordshire District would be a valuable point of reference for further information.

Viewing corridors and key visual landscapes are referred to in the document but the source for further information is not easily apparent.

Whilst not yet complete, the proposed Sustrans National Cycle Route 57 from Wiltshire to Hertfordshire passes through the centre of Wheatley adding further support to the neighbourhood plan’s ambitions for improved sustainable transport opportunities.

## **Local Enterprise Partnership**

The Government advice on planning policy set out in the National Planning Policy Framework states that ‘significant weight should be placed on the need to support economic growth through the planning system’. Oxfordshire Local Enterprise Partnership (OxLEP) is working with Local Planning Authorities and other partners to utilise the potential within the planning system to support and drive sustainable local economic growth.

OxLEP is responsible for championing and developing the Oxfordshire economy. Through the strategic priorities of people, place, enterprise and connectivity, OxLEP guides and shapes the economic growth of the county.

OxLEP is supportive of Neighbourhood Plans and of policies which relate to the priorities identified in our strategies. There is an opportunity to consider how the aims of neighbourhoods are not only aligned with the strategies in the Local Plan, but with the wider strategies of the OxLEP area.

The [Strategic Economic Plan](#) (SEP) has recently been refreshed to ensure it focuses on realising the opportunities in Oxfordshire to achieve sustainable development and to conserve its natural resources and built heritage. This provides the 'economic route map' for the county as a whole, built on the four programmes of people, place, enterprise and connectivity.

We support the Wheatley NP in the context of the vision and objectives where these are aligned with the SEP's priorities for People, Place, Enterprise and Connectivity:

- **People** – delivering and attracting specialist and flexible skills at all levels, across all sectors, as required by our businesses, filling skills gaps, and seeking to ensure full, inclusive, employment and fulfilling jobs;
- **Place** – ensuring a strong link between jobs and housing growth, and providing a quality environment that supports and sustains growth; and offering the choice of business premises and homes (including more homes that are genuinely affordable) needed to support sustainable growth whilst capitalising on and valuing our exceptional quality of life, vibrant economy and urban and rural communities;
- **Enterprise** – emphasising innovation-led growth, underpinned by the strength of Oxfordshire's research, business collaboration and supply chain potential; recognising and reinforcing the significant contribution made by all sectors, in all parts of Oxfordshire and all types of business;
- **Connectivity** – enabling people, goods and services to move more freely, connect more easily; improving broadband and mobile coverage and capacity; and providing the services, environment and facilities needed by a dynamic, growing and dispersed economy.

### Minor detailed comments

The neighbourhood plan should be checked to ensure correct references to Oxfordshire County Council and no confusion with Oxford City Council.

The List of References and Para 3.25 refer to the 2015 Local Transport Plan. Connecting Oxfordshire LTP4 2015-2031 was updated in 2016 and is available on the Council website at: [Connecting Oxfordshire | Oxfordshire County Council](#)

Paragraph 1.1 refers to the South Oxfordshire Local Plan period being 2017 to 2032. The Plan period is now extended to 2033 (other references throughout the document do seem to acknowledge this).

## Previous Comments

Oxfordshire County Council commented as follows in respect of Wheatley as part of the Local Plan 'Second Preferred Options' consultation in May 2017:

(Para 26) We support the reuse of brownfield land at Brookes campus. Additional housing here could help sustain the current bus service provision on the A40/oxford corridor and other village facilities. Policy STRAT10 should be expanded to require the development to deliver any necessary additional school capacity. The A40 is a potential barrier to movement by sustainable modes; there will be a need for good cycle and walking links to the village centre and primary school to encourage travel by active and healthy travel modes.

(Para 27) We are not clear on the reasons why the land at the Brookes campus is not proposed to be removed from the Green Belt. It may be that it is appropriate to remove this land from the Green Belt and further consideration of that should be given.

(Para 28) Other land at Wheatley is proposed for removal from the Green Belt. This is land south of London Road between the built up area of Wheatley and the cluster of development at Wheatley Bridge. The implication is that this land would be identified for possible development, whether or not it is allocated in a forthcoming Neighbourhood Plan. Policy H1 says that "On sites that are not allocated, housing development...will be permitted...adjacent to the existing built-up areas of towns and larger villages". The District Council's intentions for this land should be made clear. There appears to be some inconsistency in that the Preferred Options do not anticipate Wheatley providing housing in addition to the strategic allocation. If this site was to come forward for development in addition to the Brookes campus there should be coordinated planning of infrastructure such as primary school provision to support growth of the village as a whole. Our Education comments note that there is limited space available at the current primary school, and it could be that the County Council would not support additional land being allocated in advance of any solution to that issue.

(Para 111) It is expected that Wheatley Park Secondary School can accommodate the anticipated development at Wheatley Brookes Campus, as stated in our August 2016 comments. It is likely that development at the additional site now proposed for removal from the Green Belt could also be accommodated at the existing secondary school, although clarification of the likely scale of development here is sought.

(Para 116) Wheatley Campus: Approximately 300 homes.

- The current expectation is that the existing primary school in Wheatley could accommodate this scale of growth. As noted in our August 2016, the existing primary school is 2 forms of entry and spare places are broadly equivalent to this scale of growth.

(Para 117) Wheatley: Additional land being taken out of the Green Belt.

- It is not clear what the implications of taking this land out of the Green Belt are for school places. It could be that this would enable development creating a demand for primary school places in excess of that available given that spare space is expected to be needed to serve development at Wheatley Campus, thereby resulting in a County Council objection.

Our comments in respect of Wheatley on the Local Plan Preferred Options in August 2016 were:

(Para 7.1) Development at Wheatley Campus (300 houses) is supported. Additional housing at Wheatley Campus could help sustain the current bus service provision and other village facilities.

(Para 7.2) The A40 is a potential barrier to movement and there will be a need for good cycle and walking links to the village centre and primary school to encourage travel by sustainable modes. The existing primary school at Wheatley is just over 1 mile from the campus and is currently 2 form entry with spare places broadly equivalent to this scale of growth. It may, therefore, be able to absorb the need although there is a risk that additional capacity will be required. Secondary pupil generation from the Wheatley Campus site should be absorbed by the existing Wheatley Park School.