

Planning services

HEAD OF SERVICE: ADRIAN DUFFIELD



Listening Learning Leading

By email only:

Contact officer: Rachael Riach

Rachael.riach@southandvale.gov.uk

Tel: 01235 422600

19 June 2017

Dear John,

Wheatley Neighbourhood Development Plan - Pre-Submission Consultation

Thank you for giving the Council the opportunity to comment on your NDP.

Having now seen a complete draft, along with some of the evidence, we are able to offer formal advice compiled from across the Council, under our duty to support neighbourhood plans. Our response focusses on helping the plan meet the basic conditions as specified by the regulations.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy 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 about whether the draft plan meets the basic conditions.

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| | Section/Policy | Comment | Recommendation |
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| 1 | <p>Introduction</p> <p><i>1.2 The WNP has been developed by residents of Wheatley and Holton through several rounds of public consultation, and by working groups consisting of volunteers from the local community. Information relating to consultations can be found on the WNP website (www.wheatleyneighbourhoodplan.com) and in the links listed there, as well as in this document, references and the supporting Consultation Statement.</i></p> | <p>This part might be a better fit for the ‘Developing the Wheatley Neighbourhood plan’ section.</p> <p>More accurate to say it has been developed by the NDP group with input from residents.</p> | <p>Move to ‘Developing the Wheatley Neighbourhood plan’</p> <p>Suggest amend to: <i>1.2 The WNP has been developed by the WNP steering committee with input from the residents of Wheatley and Holton through several rounds of public consultation, and by working groups consisting of volunteers from the local community.</i></p> |
| 2 | <p>Introduction – Para 1.3, 1.4</p> <p><i>1.3 One of the reasons for the inclusion of both Wheatley and Holton Parishes in a single neighbourhood plan is that the built form of the Oxford Brookes University campus is included in the Neighbourhood Plan Area. The designated area of the Neighbourhood Plan is shown in Figure 1.1. The OBU site lies within Holton Civil Parish. Wheatley Parish Council and Holton Parish Council agreed in 2015 that Holton residents should be represented on the WNP Committee, should ‘be consulted on all stages’ of the plan, and should vote in the</i></p> | <p>I think it might be helpful for the reader and for the readability of the plan if there was a separate section on the OBU/Wheatley campus site that this information went into.</p> <p>In terms of the content:</p> <p>Explain clearly why only the built form of OBU site is included and the remainder of site excluded.</p> <p>In 1.4, rather than the Second Preferred Options ‘confirmed’, I’d suggest that the OBU site continued to be identified as a proposed development site.</p> | <p>Create separate section about OBU.</p> <p>Keep introduction broad and high level setting of the context about neighbourhood planning. Put specific details a bit later in the document.</p> <p>In terms of the content:</p> |

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| | <p><i>WNP referendum.</i></p> <p><i>1.4 Initially, in the Draft SODC Local Plan 2032 (Refined Options Stage, 2015) [1], SODC proposed 180+ (10%) new homes to be built in Wheatley. At the time, the OBU site was not for sale, but in August 2016 OBU announced its intention to sell the site. With the publication on 1 June 2016 of the SODC Local Plan 2032 (Preferred Options Stage, 2016) [2], SODC ceased to require any new housing in Wheatley, proposing instead ‘at least 300’ homes as part of a ‘mixed development’ on the OBU site, which is described as a ‘brownfield development opportunity’. This housing allocation for Wheatley was confirmed on 29 March 2017 with the publication of SODC Local Plan 2033 (Second Preferred Options, 2017) [3] which, in recognising the constraints imposed by the Green Belt, did not expect any further delivery of homes over and above those to be built on the OBU site.</i></p> | <p>You need to clarify that the point about delivery of homes is related to Wheatley as a place, despite OBU falling within a different parish.</p> <p><i>further delivery of homes at Wheatley over and above those to be built on the OBU site.</i></p> <p>It is not correct to say that we did not expect additional homes at Wheatley due to Green Belt constraints, we did not require additional homes to be identified on other sites because of the approach of 15% growth since 2011 which was applied to all market towns and larger villages – evidenced in housing supply and OAN topic paper. The development of the OBU site would account for that 15% growth.</p> | |
| 3 | <p>1.5 and 1.6</p> <p>1.5 The right of communities to prepare and establish a neighbourhood plan was facilitated</p> | <p>Yellow highlighted text might be more suitable in an OBU section rather than the introduction.</p> | <p>Put yellow highlighted text in OBU section.</p> |

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| | <p>by the Localism Act 2011 [4]. Neighbourhood planning is part of the government’s vision to provide local communities with the opportunity to engage with, and have a prominent say in, what goes on in the local area.</p> <p>1.6 While the Localism Act enables the local community to make decisions in relation to planning, the Neighbourhood Planning (General) Regulations (2012) [5] sets out the guidelines for the process. As well as having regard to national policies and advice, the WNP needs to be in general conformity with the strategic policies of the SODC development plan for the area. For this reason, the following extracts (Figure 1.2) taken from SODC Local Plan 2032 [2] and SODC Local Plan 2033 [3] are of relevance.</p> | | |
| 4 | Figure 1.2 and para 1.7 | Para 1.7 could be the opening paragraph of an OBU section | Put in OBU section |
| 5 | <p>Para 1.9</p> <p><i>1.9 This plan has provided the local community with the opportunity to decide on the most appropriate locations for key housing developments, as well as to develop principles for how the environment of the villages can be enhanced.</i></p> | It might be more accurate to say that the plan provides the opportunity to set a vision for the area and to create policies that direct development to locations considered most appropriate by the community. | <p>Amend section to:</p> <p>1.9 Neighbourhood planning provides the opportunity for local communities to have a say in where development is most appropriate by adding a level of local detail to the existing local development plan policies and/or by allocating sites for</p> |

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| | | | development. This plan has developed, with input from the local community, a set of policies that guide development in Wheatley. |
| 6 | <p>Para 1.10</p> <p><i>1.10 In the absence of the WNP, SODC would make decisions on behalf of residents both about what type of development there should be, and about which land should be used to build 300 new homes.</i></p> | <p>This is not accurate. In the absence of the WNP, SODC makes decisions based on the entire development plan and in the absence of the WNP would consider applications in accordance with the existing policies.</p> <p>In terms of where to build 300 homes, OBU is a strategic allocation of at least 300 houses (in the emerging plan P.O.2). This strategic allocation is not dependant on the WNP but is being assessed through the Local Plan process.</p> <p>Given the OBU sites proximity to Wheatley it was decided that Wheatley would not be given a housing target to meet through its NP, as is the case of other larger villages.</p> | Delete paragraph. |
| 7 | <p>2 Developing the Wheatley Neighbourhood plan</p> <p>Boxed text:</p> <p><i>The WNP Committee welcomed the opportunity to develop a neighbourhood plan that would not only revitalise the villages of Wheatley and Holton but also use the OBU development as a catalyst for fulfilling housing needs and expanded employment</i></p> | <p>This is a nice addition but might be more suited to the Vision and objectives section.</p> | Move to vision and objectives section. |

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| | possibilities. | | |
| 8 | <p>Paragraph 2.4 <i>2.4 Wheatley Parish Council responded (4 August 2016) to the SODC Consultation on the Local Plan by advising that it would wait for the forthcoming WNP before providing any further response. Holton Parish Council responded (18 August 2016) separately to the SODC Consultation with their report. SODC received almost 8000 responses in this consultation, for which no analysis has been available. In February 2017, the WNP Committee undertook an analysis of 234 responses relating to the OBU site. This WNP analysis [7] has been included in the evidence base.</i></p> | <p>All consultation responses were published on the SODC website.</p> <p>In addition, the consultation report is publicly available on the SODC website. Consultation responses were used to inform the next stage of plan making.</p> | <p>Please rewrite text to reflect this.</p> |
| | <p>Paragraph 2.6 The WNP Committee has not relied solely on questionnaires. Conversations have been held with individuals, organisations and groups as representatives of the community. These range from shopkeepers and business owners, to school's leaders, GPs and representatives from the local churches [9].</p> | <p>Are these discussions documented and available to view?</p> | |
| 9 | <p>Paragraph 2.8 2.8 Following a series of eight working group sessions throughout November 2016 to May</p> | <p>The plan has not been submitted yet.</p> | <p>Amend – change tense: 2.8 Following a series of eight working group sessions throughout November</p> |

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| | 2017 to analyse the results of the Community Survey [8] and various draft stages the WNP was submitted formally to SODC in May 2017. Community public consultation took place during May – June 2017. | | 2016 to May 2017 to analyse the results of the Community Survey [8] and various draft stages a ‘pre-submission’ consultation inviting comments on the draft plan from SODC, local people, other stakeholders and statutory consultees took place during May – June 2017. |
| 10 | 2.9 It is expected that further consultation and independent examination will be completed by July 2017 with a public referendum being held in September 2017. It is hoped that the WNP will be adopted by the end of September 2017 | Dates have moved and can move further. There is still more work to do on the plan to make it ready for submission and able to pass an examination. | Amend to: 2.9 Further consultation and an independent examination will also take place and a public referendum will be held. It is hoped that the WNP will become part of the development plan by 2018 |
| 11 | Wheatley as it is today Para 3.1 3.1 Wheatley is a linear village, extending for two miles, adjoining the A40 and leading directly to the M40. It counts as a Large Village (South Oxfordshire), but is also 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. With Holton, it hosts a complete school system for 5–18 year olds, including secondary and special education schools which serve Oxford City and the surrounding | Wheatley is categorised in the village hierarchy as a larger village. Suggest deletion of last part – the section is about Wheatley today. It might be useful to make a section that ties in history, heritage and character to put historical information into. | Amend to: 3.1 Wheatley is a linear village, extending for two miles, adjoining the A40 and leading directly to the M40. It is categorised as a larger village in South Oxfordshire’s Local Plan and it is also 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. With Holton, it hosts a complete school system for 5–18 year olds, including secondary and special education schools which |

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| | villages. It has a continuous history of habitation back to pre-Roman times and since late Saxon times has served travellers from Oxford to London. A London-to-Oxford railway line ran through Wheatley station for a century until the Beeching cuts of 1963. | | serve Oxford City and the surrounding villages. It has a continuous history of habitation back to pre-Roman times and since late Saxon times has served travellers from Oxford to London. A London-to-Oxford railway line ran through Wheatley station for a century until the Beeching cuts of 1963. |
| 12 | 3.7 Wheatley is classified as a Larger Village in South Oxfordshire, and was originally allocated a housing growth target of 10%+ under the SODC Draft Local Plan [1]. This target was withdrawn in June 2016 with the publication of SODC Local Plan 2032 [2] and confirmed in March 2017 with the publication of SODC Local Plan 2033 [3] even though the proposed target housing provision for larger villages had been increased to 15%. | The information contained in this paragraph is mentioned elsewhere in the document. Try to avoid repetition. You need to be clear about the growth approach. See OAN and housing supply topic paper – found here . | Try not to repeat information in the plan – think about structure of the plan, for example by themes or stages, as this will help to avoid the need for repetition. |
| 13 | 3.8 (last part) Although Wheatley was excluded from any additional housing requirement the WNP Housing and Land Use team has nevertheless searched exhaustively for possible infill areas within Wheatley suitable for development, and also for potential business sites which could be relocated to an OBU mixed-use | Avoid repetition – this information is mentioned in other parts of the plan. This part is more about what the group have done than about Wheatley Today. I disagree with the wording ‘Although Wheatley was excluded from any additional housing requirement’, it | Delete – maybe add into another section if not already somewhere else (perhaps OBU section) |

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| | development. | <p>would be reasonable to say that, subject to the redevelopment of the OBU site, SODC has not identified a requirement for additional housing at Wheatley. This is on the assumption that we are treating the OBU site as closely related to Wheatley and one which can be argued to be development <u>at</u> Wheatley despite being in another parish.</p> <p>It would be worthwhile explaining why the WNP Housing Team searched for possible infill sites when there was no further housing requirement to meet.</p> | |
| 14 | <p>Retail and Village centre</p> <p>3.15 The retail activities in Wheatley centre are mainly food shops (the Co-op, Costcutter, a well-established baker and butcher) and catering (pub, restaurant, chip shop and take away). Among other High Street services there is the post office, a solicitor, hairdressers, pharmacy, dog grooming, estate agent, a laundrette and a tattooist. Above the High Street on Church Road services include another pub, an architect's business, garage, dentist, the library, the parish church and a further estate agent. A vet operates on Roman Road. On the village perimeter, there is a motel complex, an ASDA store and petrol station, a car sales outlet, a coach depot and two garden centres. The seven pubs of 1975</p> | <p>Are there any other organisations religious or otherwise that have not been mentioned?</p> | <p>Include other organisations if there are any.</p> |

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| | have now been reduced to four. There are four worshipping congregations: Anglican, Catholic, United Reform and Community Church. | | |
| 15 | <p>3.17</p> <p>Limited population growth might suggest that the retail outlets do not need to expand, but Wheatley retail outlets also serve the surrounding smaller villages (Cuddesdon, Holton, Little Milton etc). As retail demand is dictated mainly by the population of Wheatley, it would increase to meet any development of the OBU site (see Section 3.17). Thame, Oxford and the Junction 8A service station also draw Wheatley shoppers.</p> | <p>How will retail supply be increased?</p> <p>It would be reasonable to say that the demand for retail would increase with additional residents. Quantitative analysis to determine whether the existing retail capacity is sufficient would be a useful piece of information to support/inform this text.</p> <p>Typo - this is section 3.17 - highlighted text.</p> | |
| 16 | <p>3.23 A green route footpath east-west across Wheatley for safer access to Wheatley Primary Academy has been mooted (and supported by the Head teacher) in a minor WNP survey. The village also lacks pavements and in some places has pavements that are so narrow they are unsafe for use by a baby buggy, impossible for a double buggy and pose problems for wheelchair users.</p> <p>Pavements are modern urban furniture, but villages now face urban-scale traffic. The WNP Committee has produced a pavement map of</p> | <p>Reference the 'minor WNP survey'.</p> <p>Highlight text - Think about wording used.</p> | <p>A green route footpath east-west across Wheatley for safer access to Wheatley Primary Academy has been mooted (and supported by the Head teacher) in a minor WNP survey. Parts of the village lack pavements and in some places the pavements are too narrow for use by a pushchair safely and pose problems for wheelchair users. Pavements are modern urban furniture, but villages now face urban-scale traffic. The WNP Committee has produced a pavement map of the</p> |

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| | the village [22]. No footpaths or pavements connect the nearby villages of Forest Hill, Cuddesdon and Great Milton with Wheatley. | | village [22]. No footpaths or pavements connect the nearby villages of Forest Hill, Cuddesdon and Great Milton with Wheatley. |
| 17 | <p>3.20</p> <p>When it is eventually sold, the OBU campus in Holton parish may afford an opportunity for a housing development within the Green Belt. Ultimately the outcome will depend on the intentions of the purchaser. New housing would increase the demand on High Street retail services, and on village facilities (including schools and GP services). Net traffic congestion would grow in Wheatley and at the access and exit points on the A40 (already a community issue). Parking facilities (another big issue) would need to be re-thought not only in the centre but also in the wider village.</p> | <p>Unclear why parking facilities would need to be increased? If issues exist because of park and ride overspill, why would additional provision help-likely would be absorbed by other park and ride users?</p> <p>What evidence sits behind the anticipated growth in traffic? Particularly when viewed in existing context set out in 3.21 40% of 4,000 is 1,600 car trips and a significant level of bus movements. Is there data on cyclists?</p> | |
| 18 | <p>3.27 The ford crossing the River Thame, recorded in 956 AD, was replaced by a bridge after 1066 (the current bridge was constructed in 1809), by which time the village was on the main road between London and the new settlement of Oxford. Today, the air quality of modern Wheatley is largely determined by a series of east-west roads.</p> | <p>Yellow highlighted text is more relevant to a section on history of Wheatley.</p> <p>Grey highlighted text. Not necessary to list the roads, can be left out of main body of plan and referenced if necessary. A map could be used to show the information in a visual format.</p> | <p>Delete yellow and grey highlighted text: The ford crossing the River Thame, recorded in 956 AD, was replaced by a bridge after 1066 (the current bridge was constructed in 1809), by which time the village was on the main road between London and the new settlement of Oxford. Today, the air quality of modern Wheatley is largely determined by a</p> |

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| | <p>Saxon highways:</p> <ul style="list-style-type: none"> • Old London Road, Church Road, Littleworth Road and Old Road once led to Oxford over Shotover • Holloway Road and Ladder Hill led from Holton to Cuddesdon • upper London Road formerly led to Islip and Worcester - the 'Worcester Road' of living memory. <p>18th century (privatised) turnpikes:</p> <ul style="list-style-type: none"> • Old London Road, Church Road, Littleworth Road and Old Road to Oxford (1719) • Old London Road, upper London Road, Shotover Valley to Oxford (1790). <p>Modern bypasses:</p> <ul style="list-style-type: none"> • London Road 'cut' (1925) • A40 bypass (1970) • M40 (1990). | | series of east-west roads. [Evidence?] |
| 19 | Figure 3.4 | Is it inappropriate use of Satnavs or inappropriately programmed satnavs? | |
| 20 | "Character" pg.14 | The content of this section is better described as history/historic character/heritage. | Change title. |
| 21 | <p>Vision and Objectives pg. 19</p> <div style="border: 1px solid black; padding: 5px; width: fit-content;"> <p>HL102 Promote the provision of 40% affordable homes, within which there will be equal</p> </div> | This would not meet the basic conditions. The 25% 75% split between intermediate and social rented is a strategic policy. It is also part of the housing strategy and evidenced by the SHMAA. See Housing comments located after this table. | Remove or change: HL102 Promote the provision of 40% affordable homes in line with the policy of the South Oxfordshire Local Plan. |

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| | proportions of social rented and intermediate housing | | |
| 22 | HL105 Prioritise the redevelopment of brownfield sites, and intensify the use of existing land where appropriate | Intensification of the use of existing land may require an SEA if it is not captured in the SA of the Local plan. | Remove “and intensify the use of existing land where appropriate” Or change to: “and intensify the use of existing land where this will not have unmitigated significant environmental effects” |
| 23 | HL201 Release land from the Green Belt only if the land does not fulfil all the functions of the Green Belt. HL202 Release land from the Green Belt only under specific and appropriate circumstances to accommodate development that is warranted by the needs of the village | NP’s cannot release land from the Green Belt. Green Belt can only be released: a) By a Local plan b) Where there are exceptional circumstances to do so. You need to evidence the needs of the village in order to justify the lands removal from the Green Belt. If redevelopment of brownfield sites is a priority and therefore a strategy that is being encouraged, you should consider whether removal of land from the Green Belt would contradict this strategy. | Amend and merge: HL201 Provide evidenced justification for the exceptional circumstances for the release of land from the Green Belt where it does not fulfil all the functions of the Green Belt. |
| 24 | 3.35 | Have the WNP identified a location for a new burial site? | |
| 25 | 3.36 | Have the WNP had discussions with Thames Water? | |
| 26 | 4.2 | Strong support for the Green Belt and priority for redevelopment of brownfield sites. Was it sufficiently clear that this could be both? | |

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| | | Also, if there is strong support for the Green Belt would land being taken out of the Green Belt be something the community would support. | |
| 27 | 4.4 | Might be better to say that any potential impacts arising in terms of traffic or parking are satisfactorily mitigated against. | |
| 28 | HL3V | <p>My concern is that these objectives and the polices that stem from them seek to achieve a great deal on only part of the OBU site and could jeopardise the viability of its redevelopment by placing burdens upon a scheme which doesn't, in the case of the WNP designated area, have the ability to respond. I would question how realistic some of these aspirations are.</p> <p>The OBU site is larger than that referred to in the WNP. It does not simply comprise the built-up area and extends beyond the WNP designated area.</p> <p>The emerging SODC Local Plan identifies and proposes to allocate the OBU site as a strategic site for development. It is not clear what the WNP is seeking to add and the justification for doing so?</p> <p>HL301 What is the justification for the retention of buildings? This could impact of the delivery of an appropriate development scheme</p> | |

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| | | <p>HL302 – unnecessary duplication</p> <p>HL303 – unnecessary duplication</p> <p>HL304 – I cannot imagine that the tower would be retained in a development scheme and its removal will be a significant benefit. It should be noted that the bulk of development provided by the existing structure can be factored into the considerations for development proposals for the site.</p> <p>HL305 SODC will require a landscape/visual impact assessment to be carried out and submitted alongside any planning application. The east of the site is less open and could accommodate a higher density/dwelling height when compared to the west of the OBU site.</p> <p>HL4V Can commercial buildings be relocated to the OBU site and still expect a scheme to deliver 300 units?</p> <p>HL5V A burial site is an appropriate Green Belt use, there is therefore opportunity to locate this elsewhere and it would be suitable to do so.</p> | |
| 29 | 7.7 | If the land proposed to be removed by the SODC is supported by the WNP, then a great deal needs to be | |

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| | | <p>added here in terms of clarity regarding what is to be achieved.</p> <p>There is another point about identifying robust and defensible Green Belt boundaries, this is not for the WNP to consider, rather it is in the remit of the Local Plan to consider.</p> | |
| 30 | <p>H1 POLICY H1: SUPPORT PROPOSAL FOR HOUSING ON TWO SITES Support use of land for new housing at the sites listed below. Development within each site is subject to the Site Allocation Policies set out in this Plan.</p> | <p>Para 42 of the Neighbourhood planning practice guidance states: <i>“A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.”</i></p> <p>Policy H1 favours development in certain areas over other areas.</p> <p>You have followed a process of site selection that shows the methodology and criteria you used to rule out other sites and put forward these sites this indicates that your NP is making an allocation.</p> <p>As we have previously discussed if your NP intends to make site allocations it would be your responsibility to undertake the appropriate assessments ie. SEA/SA. However, we understand this is not your intention.</p> <p>As highlighted in para 42 of the NPPG, making site</p> | <p>I would recommend the removal of policy H1 and the site assessment chapters from the plan.</p> <p>If you do want to allocate sites in the plan, further work on the evidence and the methodology used to come to the plans conclusions will need to be carried out. This would likely require an SEA be carried out.</p> <p>The site assessment for NP’s we linked you will give you a good overall indication of the process involved. We can meet to discuss this with you.</p> |

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| | | <p>allocations would require a well evidenced site assessment following a robust methodology. Having reviewed the information provided we do not think this has been achieved. Please see an example of how this could be achieved here.</p> <p>However, as the OBU site is one of the preferred options in the emerging Local Plan you have an opportunity to set out the local community’s aspirations. This could add a local level of detail to our emerging policies without making a site allocation and would be better achieved with a revised version of policy SP2 instead of H1.</p> | |
| 31 | <p>8.4 <i>In addition to enabling communities to decide where new development should go, one of the key purposes of neighbourhood planning is to enable local communities to say what new development should look like. To ensure Wheatley and Holton residents and businesses are able to influence and shape new developments at an early stage in the design process, allocated sites within the WNP are expected to prepare a Design Brief. In preparing the Design Brief the following three stage process is encouraged.</i></p> | <p>8.4 mentions “allocated sites” – to allocate sites will normally require an SEA.</p> <p>There are other ways aside from allocations, through NDP policies, that the design of new development and its location can be influenced further by local people. This might be an approach to explore further if allocations do not form part of the submitted plan.</p> <p>Building on existing policy with local detail can inform where the most appropriate locations for development might be without being prescriptive by way of making an allocation.</p> | <p>Recommendation –</p> <p>Create a well evidenced design policy that is underpinned by a character assessment that gives specific detail about what character and what design is valued (and a landscape character assessment if necessary).</p> <p>Allocation: Show that the environment (historic, natural) has been taken into account in your decision on which sites to allocate. Can use information in the SA for the</p> |

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| | | If WNP wishes to make policies and allocations with the level of detail included, this is possible, but a more rigorous process needs to be followed. | emerging Local Plan. |
| 32 | <p>H2 DESIGN BRIEF</p> <p>For each of the sites listed in Policy H1, a Design Brief (or its equivalent at time of housing construction) must be produced for the whole site, setting out the principles for development, prior to the submission of a planning application. Development must be implemented in accordance with the principles set out in the Design Brief. Applicants must discuss the content of the Design Brief with Wheatley Parish Council and, for the OBU site, with Holton Parish Council. The Design Brief must demonstrate consideration of the following issues: i. Location, type and management of open space and recreation facilities ii. Location, type and management of landscaping iii. Management, impact and mitigation of views, vistas and adjacencies iv. Building use, scale, height, density and massing v. Materials palette vi. Removal and disposal of asbestos in accordance with current legislation vii. How the development responds to local character</p> | <p>Your planning policies can require applicants to demonstrate how they will achieve the requirements of your plan in the information which is provided alongside the planning application. You will need to justify that any extra requirements are proportionate, relevant and necessary.</p> <p>A design and access statement is already required for most major and full applications in South Oxfordshire (see here). It would be better to amend your policy to make it more about guiding developers on what information to include in a Design and Access statement rather than create a new validation requirement.</p> | <p>Delete policy (if not allocating). Amend policy (if allocating).</p> <p>Please note: You can encourage developers to involve W-PC in the design process for certain sites. However, it would not be appropriate to make this a requirement or a policy.</p> |

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| | viii. Connecting walking and cycling routes ix. Promotion of sustainable development and energy efficiency. | | |
| 33 | 8.8 To achieve this flexibility, where appropriate, development proposals are required to prepare a Dwelling Statement to show how the proposal meets the specific housing needs and demand of Wheatley and Holton. | Neighbourhood planning sets out a unique opportunity to identify local housing need. This information would add detail to existing and emerging district wide policies. Requiring this information to be achieved through individual dwelling statements adds an unnecessary and disproportionate burden to development. It should be noted that, as a brownfield opportunity, development of the OBU site can provide greater benefits than to just Wheatley and Holton. In an earlier part of this document the wider rural hinterland was seen to be supported. The Emerging SODC Local Plan is considering the development needs of the whole District and it would not be appropriate to take a restrictive approach in this regard. | To be discussed at meeting. See Housing Needs Assessment guide for neighbourhood planning here . |
| 34 | 8.10 For Wheatley and Holton, SODC Local Plan 2033 [3] does not address housing on suitable infill and redevelopment sites. The provision of new housing through infill and redevelopment opportunities is classed as 'windfall'. Windfall sites are those that have not been specifically allocated in the WNP and | Policy H18 of emerging Local plan sets out approach to infill development. | Delete para. Could define windfall and infill in a glossary. There are definitions in the glossary of the SODC Core Strategy. |

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| | have unexpectedly become available. | | |
| 35 | <p>H3 Development proposals providing 8 or more net additional dwellings will set out a Dwelling Statement. This will be submitted as part of any planning application to show how the proposal provides an appropriate choice of homes that meet the specific housing needs of Wheatley and Holton. The Dwelling Statement should provide details on how the proposed development a) meets the needs of different groups in the community, such as but not limited to, young people, local workers, small families, older residents (55+), and people with disabilities b) provides a high-quality of internal and external living space.</p> <p>Development proposals for 8 or more net additional dwellings should also provide details of how housing types, sizes and tenures are appropriately 'pepper-potted' across the site to avoid large areas of uniform type, size and tenure.</p> | <p>Please see comment for 8.8. and H2 - Nos. 32 and 33</p> <ul style="list-style-type: none"> • It is not clear what evidence there is for 8 dwellings triggering the policy. • I am aware it is encouraging – stop and think/raising awareness in the design process. • However, the policy only asks for a dwellings statement, it does not detail what high quality living space is or what is required to meet the needs of different groups in the community. • Policy has two different themes – urban design/housing type and housing need. It would be better to deal with these issues separately. • In terms of pepper potting – this is a bit too prescriptive. For example, there may be occasions where pepper-potting is out of character particularly in developments of 8 houses. • It would be more valuable to create a design policy that corresponds with a character assessment. | <p>Suggest removal of dwelling statement requirements and the addition of further detail about design.</p> <p>See: Brightwell-cum-Sotwell NDP Policy BCS9 as an example of a design policy (here).</p> |
| 36 | <p>H4 INFILL AND SELF-BUILD DWELLINGS Infill housing developments and proposals for the construction of self-build dwellings within the</p> | <p>The local development plan already has an infill policy (CSR1), as does the emerging plan (H18). An infill policy in the WNP should aim to add a greater level of detail to this policy.</p> | <p>Reword policy to make it clearer. Add some supporting text that links to the evidence. Be specific.</p> |

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| | Neighbourhood Plan Area will be supported where it is demonstrated that the proposed development constitutes sustainable development consistent with the WNP vision, objectives and land-use strategy | Currently, this policy adds the detail by referring to the plans vision etc. However, it could do with being more specific as, presently, it would be quite difficult to use and is open to a great deal of interpretation of vision, objectives and land use strategy. Some supporting text would help with interpreting it as it is not clear what this policy hopes to achieve or what evidence it is based on. Also, it is not clear if it refers to Infill housing developments that are self-build or, infill housing developments, and/or also self-build developments. | |
| 37 | H5 If plots of land, especially at the eastern end of the village, are taken out of the Green Belt within the framework of a Local Plan, then proposals for their residential and commercial development will be supported if they satisfy the needs of Wheatley and are supported by consensus of the residents of Wheatley. Preference will be given to appropriate sites where they afford the creation of new businesses and allow improvement and relocation or expansion of existing light industry within the village. | Evidence to support housing need at the local level or commercial needs at a local level has not be provided. It is not clear or specific enough what you propose to allocate and the location itself is not clear. Justification for the exceptional circumstances to support the Councils proposal to remove land from the Green Belt has also not been provided. In the absence of the above, the council has no evidence on which to base the removal of this land from the Green Belt. | Remove policy. |
| 38 | P1 PARKING PROVISION Parking standards for new residential developments recognise that | What do the parking standards say? What parking standards are there? Where is the evidence to justify your requirements? | Look at the Car parking comment on page 17-19 of the Long Wittenham NDP examiners report (here). |

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| | <p>'tandem' parking is inconvenient and should generally be avoided, as both spaces are rarely used. Given this, and in order to guard against overspill onto the existing busy and constrained road infrastructure, tandem car parking spaces will count for only 50% of a parking space when calculating the level of parking provision for new residential developments.</p> | | |
| 39 | <p>8.14 Traffic congestion within Wheatley causes major inconvenience to road users, cyclists and pedestrians, and creates an unpleasant environment, particularly within the village centre. To monitor the air pollution, an Air Quality Management Area (covering the High Street) is designated at Wheatley due to the traffic issues.</p> | <p>Traffic congestion is not necessarily the sole reason for the designation of the AQMA.</p> | <p>Suggest change to: Traffic congestion within Wheatley causes major inconvenience to road users, cyclists and pedestrians, and creates an unpleasant environment, particularly within the village centre. Exhaust fumes also contribute to air pollution. Presently, an Air Quality Management Area (covering the High Street) is designated at Wheatley.</p> |
| 40 | <p>8.15 The WNP seeks to minimise the impact of existing and additional congestion on the road network, particularly the village centre. Any increase in traffic volumes is a very strong concern and has influenced the housing site selections. Proposals should not seek to increase housing numbers on the sites allocated in the WNP as this will be likely to</p> | <p>Allocations are referred to here.</p> <p>There also needs to be clear and robust evidence to support the claim that unacceptable traffic congestion and air quality impacts will be caused. Otherwise this statement will be obsolete.</p> <p>It would be better to state that proposals should consider</p> | <p>Suggest deletion of highlighted text.</p> |

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| | result in unacceptable traffic congestion and air quality impacts around Wheatley. | carefully and as a high priority the traffic and air quality impacts of their proposals and show that they will not lead to significant air quality impacts and unacceptable levels of traffic. It may also be helpful, if possible, to define from evidence what the traffic/air quality levels are currently and where they are considered to be most problematic. | |
| 41 | 8.18 Constraints on land availability in Wheatley reduce opportunities to deliver new community facilities. Existing facilities, notably the Merry Bells, Wheatley Scout Movement etc provide important community services in relatively outdated buildings. Opportunities to provide these services within larger facilities that retain the existing services and provide space for additional community functions should be explored and supported, including consideration of a 'sustainability hub' which brings together ideas and organisations related to low-carbon living. | Avoid use of "etc." in the final NDP. | |
| 42 | 8.19 Community facilities wishing to apply for renewal utilising S106 [34] or CIL [35] funds should register with Wheatley Parish Council who will engage with SODC on their behalf. | CIL money which has been transferred to the parish council can be spent by the parish council. There is no further consultation with the district council necessary. It would be helpful to have a section on infrastructure | Amend paragraph to make it accurate. Create a section on infrastructure projects. |

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| | | <p>projects within the NP. For example, (i) which infrastructure projects are considered essential (ii) a list of local infrastructure projects the parish would like to spend CIL money on.</p> <p>Things you would want to consider are:</p> <ul style="list-style-type: none"> • A list of projects or priorities for the parish. • Are the projects costed? Could they actually be delivered? • How you will decide what to spend CIL on? • How you will engage with the community on how to spend CIL? • Do you have effective administrative processes in place that will allow the district council to pass on CIL funds? • Do you have effective reporting mechanisms to show how you have spent CIL? <p>Finally, please be aware of the exemptions/reliefs on CIL, such as affordable housing is exempt and self-build housing.</p> <p>In the main the CIL charge is applied to residential development and large retail development. Retirement housing does not pay CIL.</p> <p>When a site is redeveloped the floorspace of the existing</p> | |
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| | | building can be considered for the purpose of calculating CIL (i.e. when the building has been in use for the last 3 year the floorspace can be deducted from the proposed floorspace). | |
| 43 | <p>SC11 RENEWAL AND ENHANCEMENT OF COMMUNITY FACILITIES</p> <p>There will be no net loss of recreational space, educational facilities, high-quality sports, leisure, healthcare and social facilities to meet the community needs commensurate with an expanding population of all ages.</p> | <p>As worded the policy is overly restrictive. You may be able to overcome this issue by adding a caveat that allows development to take place where it can be shown that the facilities are no longer required or financially viable.</p> <p>It would be helpful if the valuable local facilities were identified in the supporting text or as an appendix. This would ensure that the policy adds a local level of detail to existing policies of the local development plan.</p> <p>Policies SC11 and SC12 have the same name – change so that they are different.</p> | <p>Change policy name.</p> <p>Suggest you amend to be more like below example:</p> <p>Policy CF2 – Community Assets</p> <p>Development proposals that will result in either the loss of or significant harm to a designated Asset of Community Value will be resisted, unless it can be clearly demonstrated that the operation of the asset, or the ongoing delivery of the community value of the asset, is no longer financially viable.</p> |
| 44 | <p>SC12 RENEWAL AND ENHANCEMENT OF COMMUNITY FACILITIES</p> <p>The renewal and enhancement of community facilities in line with the WNP objectives will be supported.</p> | <p>Policy lacks the clarity required by policy and guidance. We believe this policy’s intent can be better achieved with the example provided in the recommendation column.</p> | <p>Suggest you amend to be more like below example:</p> <p>Policy CF3 – Improvements to Community Assets</p> |

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| | | | Proposals to improve the viability of a designated Asset of Community Value, or of any other established community use by way of the extension or partial redevelopment of buildings and land will be supported, provided the design of the scheme and the resulting increase in use are appropriate in design terms and will not harm the amenities of adjoining residential properties. |
| 45 | B1 BURIAL PROVISION No new developments will be supported until a suitable site for an additional burial ground is identified and confirmed. | <p>The policy as it is, is not appropriate.</p> <p>Data suggests Wheatley needs new burial space – important to reference this. Agenda item 6 (here) gives information. However, NDP’s should not restrict all future development on this basis.</p> <p>This policy in its current form does not plan positively for the future and does not address the issue. It would not meet basic conditions.</p> <ol style="list-style-type: none"> 1. You could consider some locations for a new burial ground (can be in Green belt.) – this could trigger the need for an SEA and would need a stronger evidence base to support. 2. You could put forward a policy like Brightwell-cum-Sotwell NDP which has recently passed | <p>Suggest policy is taken out of plan or amended to be effective and positively worded.</p> <p>You could include a policy like the one in Brightwell-cum-Sotwells NDP: <i>“Natural Burial Ground proposals for the development of a natural burial ground, including any necessary, permanent ancillary structures for the management of burial arrangements, will be supported, provided they are located and designed to suit the character of the local landscape.”</i></p> |

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| | | <p>examination.</p> <p>Please note that new development could be an extension to a house according to the definition of development.</p> | |
| 46 | <p>VCE1 WHEATLEY VILLAGE CENTRE Proposals for any new housing, retail, leisure and office development within the defined village boundary on allocated or unallocated sites outside the village centre must be in locations which are accessible to the village centre by walking, cycling and public transport, and have appropriate on and/or off-street car parking provision. Such proposals will be subject to a sequential test and, for proposals comprising 1,500sqm or more net additional floor space, an impact assessment. Proposals which fail the sequential test, reduce the existing parking provision or are likely to have a significant adverse impact will not be supported.</p> | <p>You can simplify the policy and improve its clarity by deleting the words ‘within the defined village boundary on allocated or unallocated sites outside the village centre’.</p> <p>‘must’ and ‘must not’ – only use ‘must’ where you are sure that the requirements of the policy are compulsory in all circumstances.</p> <p>It is not clear what is meant by ‘defined village boundary’. Wheatley is inset in the Green Belt, if you are referring to the line between land outside and inside the Green Belt as the village boundary you should make this clear.</p> <p>This policy appears to have the aim of directing development toward locations that are accessible to the village centre by walking, cycling and public transport.</p> <p>Local and national policies already direct new development to accessible locations. It is not clear what level of local detail this is adding or how it is adding to the existing interpretation of what is an accessible location.</p> <p>A way to improve the first part of this policy would be to</p> | <p>Amend first part of policy.</p> <p>Delete second part, or evidence why the inclusion of housing and 1500sqm trigger point (sequential test and impact assessment).</p> |

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| | | <p>provide information about the local cycle, walking and public transport network that new development could connect to. This could be in the form of a map.</p> <p>The policy then seeks to introduce a requirement for all forms of development listed in the first part to be subject to a sequential test and for development over 1500sqm net additional floorspace to have an impact assessment. You will need to provide justification for reducing the threshold for an impact assessment from 2500sqm (CST1 of the Core Strategy) to 1500sqm. You will also need to justify why you have extended the requirement for sequential testing and impact assessment to housing – as opposed to just retail and leisure as it currently is in the Core Strategy.</p> <p>Please note that policies should be positively worded.</p> | |
| 47 | <p>E1 SUPPORTING WHEATLEY'S ECONOMY The development of existing businesses and forging of new commercial initiatives will be supported.</p> | <p>This is more of an objective than a policy. How in land-use terms can this objective be supported/facilitated to turn this into policy?</p> <p>NP polices should be locally distinctive, can you add any locally specific detail?</p> | Remove policy or amend it to relate to land use. |
| 48 | <p>EN1 BIODIVERSITY The protection and enhancement of urban and rural biodiversity will be supported. Net</p> | <p>To improve this policy, you could include some local information in the supporting text and evidence base about the biodiversity in Wheatley. What habitats and species exist presently? and what actions could be taken to</p> | |

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| | gains in biodiversity, through the creation of new habitats, the enhancement of existing sites, and the development and implementation of ecological management plans, will be supported. | create net gains? | |
| 49 | DQS1 LOCAL CHARACTER All new development should be sensitive and make a positive contribution to the local character of the area. The key visual landscapes will be preserved. Where Design Briefs are required, they should demonstrate how the proposed development will respond to the local character in terms of design and materials. | The local development plan already includes policy relating to character. An NDP is an opportunity to add locally specific detail to this policy. Therefore, to improve this policy, you will need to clearly link it to the evidence base - e.g. a character assessment/landscape character assessment. In the character assessment, you need to say clearly and specifically what the valuable aspects of character are – what are the key visual landscapes and why are they valuable? You should also say more about assessing the impact on local character <i>and</i> the designated heritage assets (which would include the conservation area and setting of LBs) in the policy. | If making mention of key visual landscapes, be clear about what these are and include them or reference them in the policy. |
| 50 | DQS2 COMMUNITY ENERGY PROJECTS Conformity to good-quality existing design guidance provided by the New South Oxfordshire Design Guide [29] and the | This policy does not make sense grammatically. Conformity of what to good quality design guidance? What is the outcome of conformity? What are the specific aspects of the design guides that are most important to | Remove policy. Create chapter for projects. |

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| | <p>Chilterns Building Design Guide [30]. Individual and community energy-efficient and sustainable projects will be supported.</p> | <p>conform with in relation to Wheatley?</p> <p>The second part of the policy is too vague and is not linked to land-use but rather it relates to projects. Therefore, it should not be a policy.</p> <p>Some NDP's have a chapter that outlines projects that they would like to deliver or support over the plan period. A chapter such as this would be a more appropriate place to put the information.</p> | |
| 51 | <p>SP1 WHE18 – 'The Railway' Site The Railway site is approximately 0.53ha (as shown in Figure 9.1). Any development scheme which ensures delivery of the following will be supported:- a) new homes designed for retirement housing b) retention of sufficient land for a pedestrian walkway to the primary school c) retention of some space for public parking.</p> <p>The Design Brief prepared for this site should demonstrate how the proposed development d) incorporates provision of a pedestrian crossing for Station Road e) incorporates sufficient parking to include adequate visitor, and some public, parking f) provides for future</p> | <ul style="list-style-type: none"> • The first part of this policy needs rewording. Currently "Any development scheme will be supported" if a, b and c are met. It needs to be reworded to show regard for other policies and constraints. • the evidence, justification and methodology used to come to the decision to support new retirement housing over other types of housing needs to be more clear. (see comment No.30 for policy H1). • it is important to show that you have considered how retaining land for parking and for a pedestrian walkway will impact on the viability of the development proposals and what can be delivered on the site. <p>The next part of the policy:</p> | <p>Provide further justification and reword. Introduce a caveat to avoid policy being too restrictive.</p> |

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| | access to the BT site when development is considered. | <p><i>d.) incorporates provision of a pedestrian crossing for Station Road – explain why this is important, why is this crossing needed and how is this need triggered by the introduction of new retirement housing. What mechanism will achieve this.</i></p> <p><i>e.) The parking standards already set out visitor and resident parking requirements, refer to these. In terms of public parking, explain how development on the site would impact on public parking and why the development should provide this.</i></p> <p><i>f.) be specific about what the BT site is – perhaps use a map to show the location and what you mean.</i></p> <p>In its current form, the policy is overly restrictive and should have a caveat for instances where it can be shown that its requirements cannot be reasonably met in the delivery of the site.</p> <p>Finally, please note that retirement housing does not pay CIL.</p> | |
| 52 | 9.9 Whilst the built form of the developable area could support a density of around 24 dwellings per hectare, the mixed-use elements of retail, community and business | The Council will require an arboricultural assessment to support any planning application on the site and as such this may be unduly restrictive. | |

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| | space will reduce the land available for residential development. Furthermore the built form includes existing areas of public green space, outstanding views and protected trees (TPOs, see Figure 9.3) of which 54 have been identified [36] as Grade “A” and therefore worthy of retention. These landscape features are expected to be retained or replaced (as appropriate). | | |
| 53 | <p>SP2</p> <p>WHE25 - OBU Site The OBU site is approximately 12.11ha (as shown in Figure 9.2). Any development scheme which ensures delivery of the following will be supported:- a) Housing in accordance with LP2033 [3] of which 40% are deemed affordable b) Retention of some of the land/existing buildings for light industrial or SME (Small Business Enterprise) together with adequate parking facilities c) Enhancement of the public realm in the vicinity of the site through design and landscape measures, public open space and/or financial contributions, subject to viability. d) Playing pitches and tennis courts together with indoor changing facilities e) A community hub comprising some retailing and community space (eg day care, transport links</p> | <p>There are various references and requirements for this site scattered throughout this document which ought to be pulled together to aid clarity and reduce confusion.</p> <p>I would stress that this site is being proposed in the emerging Local Plan and it is not clear how this would be in accordance with the proposed allocation and its approach does not clearly accord with the plan.</p> <p>a) duplication b) no evidence/requirement for retention d) what is the evidence for this? Is this expected on WNP area? e) what is the evidence for this? Is this expected on WNP area? l) what is justification for bridge over A40? This development alone is not going to finance this. r) this is a housing led redevelopment. The SODC Local Plan</p> | <p>If the intention is not to allocate the site then the policy will need rewording to that effect.</p> <p>Remove parts of policy that are not relevant or are duplications.</p> <p>Provide justifications and reference evidence to support the policy.</p> |

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| <p>) The Design Brief prepared for this site should demonstrate how the proposed development fulfils the following criteria: f) Incorporates and reinforces or maintains (possibly by land use exchange) the existing landscaping, pitches, green infrastructure, and biodiversity features, particularly along the site's northern and western boundary edges g) Ensures that the development has no greater impact on the surrounding environment than the existing development on the site, and that development conserves and where possible utilises existing buildings and enhances the landscape and scenic beauty of the site h) Assesses the impact of the proposed development on the landscape by undertaking a Landscape and Visual Impact Assessment i) Delivers new and improved cycle and pedestrian links (to include a bridge across the A40) public transport accessibility to enhance integration with Wheatley village centre including improved pavements (especially on Church Road and Friday Lane) and pedestrian crossings on roads as necessary j) Incorporates a package of highway and junction improvements to ensure that the development is serviced by two access roads</p> | <p>does not include employment land specifically on this site.</p> | |
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| <p>that are linked and • as a minimum, has no greater impact on traffic congestion than the existing permitted development on the site at Waterperry Road and Holton Way with measures to be agreed with OCC • provides improved vehicle management for London Road and Old London Road k)</p> <p>Protects/enhances Ancient Monument and its setting located on the adjacent land l)</p> <p>Achieves point k through a geological survey to ensure the Ancient Monument is protected and to help inform the design of the site m)</p> <p>Responds to the site’s environmental and landscape context, including preservation of current views of adjacent listed buildings and views to neighbouring villages (see Figures 8.2 and 9.5) n)</p> <p>Ensures that the profile of any and all new housing and buildings does not obstruct to any appreciable extent views of the horizon or protrude above the existing profile of the existing buildings (with the exception of the Tower block). o)</p> <p>Provides a detailed brief as to the method of all contamination (in particular, asbestos) removal and disposal from the buildings on the site according to agreed procedures p)</p> <p>Includes removal of the existing tower block</p> | | |
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| | to restore the natural views across to the Chilterns (see Figure 9.4) q) Maximises the number of retained TPOs as part of appropriate and reasonable development in accordance with BS583712012 [37] r) Delivers more employment opportunities | | |
| 54 | 9.10 If the SODC Local Plan LP2033 is adopted and includes the incorporation of WNP POLICY H5 for alterations in the Green Belt then in the event that the combination of developments at WHE18 and WHE25 cannot achieve the Vision and Objectives of the WNP the contingency plan for development will be implemented, subject to all permissions, regulations and community opinion being agreed. | The proposed changes to the Green Belt cannot be maintained as a contingency site. There needs to be clarity from the WNP as to whether the full extent is needed or not. We need to demonstrate exceptional circumstances to release land from the Green Belt and this is not coming across in this WNP. If the site is not now needed to meet WNP aspirations, then the Local Plan should be amended to remove this proposal. | Remove para. |
| 55 | SP3 CONTINGENCY SITES If plots of land, especially at the eastern end of the village, are taken out of the Green Belt within the framework of a Local Plan, then proposals for their residential and commercial development will be supported if they satisfy the needs of Wheatley and are supported by consensus of the residents of Wheatley. Similarly, brownfield sites can be considered for change of use. Preference will be given to | Similarly, with comment No. 37 for H5: This policy needs to provide more specific detail, that is supported by evidence, as to the exceptional circumstances for taking land out of the Green Belt. It would require SEA work to support the decisions presented in a, b, c. What options have been tested? Have the impacts been assessed using a robust methodology? | Remove policy. |

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| | appropriate sites where they afford the creation of new homes, new businesses and allow improvement and relocation or expansion of existing light industry within the village. These will include:- a) WHE16 for light industrial use b) WHE22 for conversion from light industrial to housing (see Figure 9.6) c) WHE15 for housing, bungalow relocation and public open space (see Figure 9.6) together with burial provision if this cannot be accommodated on WHE25. | Without this detail the land will not be taken out of the Green Belt. | |
| 56 | Figure 9.6 WHE15 (point 2) Following SODC policy at least 40% of the dwellings to be low cost for potential first time buyers | Affordable housing mix is set at 75% social rented and 25% intermediate. This cannot be changed. | Amend to reflect this. |

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Appendix – Further comments:

Response: Wheatley Neighbourhood Plan

From: Housing Development

Date: 06 June 2017

Our comments on the draft Neighbourhood Plan version are:

The Neighbourhood Plan refers to National, County and District housing and planning policies to set the context and framework for the proposed objectives HL101-HL106 and policies H1, H2 H3 and H4.

SODC policy requires that on all developments of 11 units or more 40% must be affordable with 75% rented and 25% shared ownership. This is at odds with the proposal in the draft neighbourhood plan which states 'equal proportions of social rented and intermediate housing'.

We would recommend that the draft policy is slightly reworded to be in conformity with the affordable housing policy of SODC.

All affordable housing delivered has to be available to meet a district wide need, although the Councils Allocations Policy does enable up to 20% of new build affordable rented homes to be allocated to households with a specified local connection on first lettings only. This can only apply on sites large enough to deliver at least 5 affordable homes for rent. To give an example a site of 20 new homes would require a District level affordable housing requirement of 40% with the resulting units being split 75/25 rent/shared ownership respectively. In this instance that would mean 8 of the units would be affordable with 6 for rent and 2 for shared ownership, with 1 of the rented units being specified for a local connection.

To achieve Affordable Housing that is allocated with a priority for local people in perpetuity Rural Exception Schemes, such as the development on London Road are the correct vehicle. As a housing development team we work pro-actively with parishes to explore this option further.

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We would recommend that the draft policy is slightly re-worded to comply fully with the allocations policy of SODC.

Whilst we recognise that the Neighbourhood Plan team has taken account of the SHMA, Government Welfare reform, introduced since the production of the SHMA, has seen a significant increase in the demand for two bedroom accommodation for rent with a reduction in demand for larger rented family homes due to the changes in eligibility for Housing Benefit.

Although the demand for 3 and 4 bedroom properties has reduced there is a need for some families to have access to larger 3 bedroom houses with capacity for 6 bed spaces if they are not currently eligible for 4 bedroom accommodation. The SHMA recognises that, whilst the demand for one bedroom accommodation is also high for rented units, this size of accommodation provides less flexibility in meeting changing household need and that there is potential for greater turnover as a result of household moves. Changes in Housing Benefit payments also impact on the eligibility of single people in particular for a self-contained unit. The requirement for councils to meet the needs of homeless families may also indicate a need for a bias away from one-bedroom to two bedroom provision. The demand for two-bedroom shared ownership properties is much higher than for one-bedroom properties, therefore the overall affordable housing mix may be more suitably delivered with a higher proportion of two bedroom properties than is indicated in the SHMA guidance. In general, it is anticipated that the mix of affordable housing should reflect the significant demand for two bedroom units for both rented and shared ownership tenures with a reduction in one-bedroom accommodation and an adjustment to the number of larger homes.

The draft Neighbourhood plan also makes reference to 'key worker homes' this term is no longer in use and at the examination of the Chinnor Neighbourhood Plan the inspector removed the wording from the Neighbourhood Plan.

We would recommend that Wheatley removes all references to the wording Key Worker Housing.

If the Neighbourhood Plan team would like any further advice or help in drafting these policies please do get in touch with the Housing Development team at SODC.

It is also worth the Neighbourhood Plan team looking through the housing white paper.

Jan Phillips

South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Abingdon, Oxfordshire OX14 4SB www.southoxon.gov.uk



Housing Development Officer
06 June 2017

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