

**Wheatley Neighbourhood Plan Committee, 29 October, 2018,  
Responses x 5, to SODC Planning, ref: P17/S4254/O**

**1. John Fox, Chairman WNP Committee**

**1.1** On 21 Oct. I asked 3 questions of our Statutory Adviser at *Historic England*.

**A** – Does the proposed increase of dwellings 300 to 500 proposed by GVA against the Local Plan, and their westward siting of homes outside the built-form clash with H.E's considerations in the Environmental Report on Draft WNP, received August 2018 ?

**B** - Trees marked in red in the south west end of the GVA proposal are sought to be cut.

They lie south of the Scheduled Monument, which HE advised SODC (LP Preferred Options 2) needs 'an appropriate buffer to protect and respect [it]'. Is that being heeded ?

**C** – Would the historic *vista* to and from Holton House, be affected by the high security fencing the school fears it would need amid this proposed larger development ?

**D** – *Not Yet Asked*: Are the 'medieval' fishponds on this 12<sup>th</sup> century parkland listed ?

Apparently preserved 'dry' during the military hospitals period, 1943-61, they survived.

**1.2** The acoustic bund is unclear on GVA maps. OCC says it would be necessary to the maintaining of air quality as well as to abating noise. In GVA's proposal, the E-W road through the site would serve 1000 cars generated by 500 homes along its length. Noise from the London Rd, Old London Rd, A40 and M40 already reverberates across Wheatley valley, exacerbated by wind direction and in still-air conditions. WNB Public Consultation in 2017 uncovered concerns about Air Pollution on Old London Rd., (**Ref:** WNP Website, [www.wheatleyneighbourhoodplan.co.uk](http://www.wheatleyneighbourhoodplan.co.uk) Evidence Base [EB], EB Research/Surveys **No 14, 15** and **16**.) Whatever the homes quota at OBU, the bund must be taken seriously.

**1.3** Proposed tree cutting includes 'Notable Tree' and 'Notable Species'. Holton Park is not a *derelict* parkland or brownfield site. Its last stately residence owners left only in 1948. The wartime military buildings removed at the end of National Service in 1960 did not destroy the Park either. This proposal from GVA for land still without a known buyer or intended future, is as substantial as a smoke-ring. Accepted statutory limits like Green Belt are ignored, as are the emerging Local Plan figures and siting of homes .

**1.4** See WNP website, [www.wheatleyneighbourhoodplan.co.uk](http://www.wheatleyneighbourhoodplan.co.uk) *Recent News and Updates, Updating the Number 300, 2016-2018*. Secondly, see website, Evidence Base [EB], Links with SODC, **No 4**, 07 September 2016, Meeting WNP Committee with Planners.

**2. From Roy Gordon, vice-Chairman, WNP Committee**

**2.1.** The aim of the proposal is still **contrary to that described in Local Plan 2033**, (Preferred Options 2), see STRAT10. The proposal still exceeds the number of homes envisaged for the site.

**2.2** STRAT10 proposes around 300 homes with their location '**constrained by the existing 'built form'**' on the OBU Site and by the Green Belt status of much of the Site. GVA's proposal has repeatedly ignored local support in Wheatley for STRAT10 and instead proposes a much larger, more intrusive development which also infringes the Green Belt status of part of the Site.

**2.3.** National Planning Policy requires that to develop on Green Belt requires '**exceptional circumstances.**' It is still not clear that the GVA proposal establishes such circumstances. As far as can be understood, the sole driver for houses to spill from the brownfield built-form onto virgin Green Belt and thus increase to 500 houses is the commercial wish of the landowner and developer. This is not an 'exceptional circumstance'.

**2.4.** It is clearly desirable that any development of the OBU site, even for 300 homes, **should be integrated satisfactorily into Wheatley and Holton villages**. The GVA proposal does not acknowledge sufficiently the need for integration, or how to achieve it. Proposals for improved

cycleways and pedestrian walkways are welcome, but they ignore the transit time needed to walk between the OBU bus stop and centre of Wheatley (20 minutes), the Primary School (25 minutes) and ASDA (20 minutes). Such transit times would bias residents towards car use to get to Wheatley, thereby aggravating traffic and parking issues.

**2.5.** The serious issue of local traffic, local rush hour(s) and a congested A40 flyover are of major community concern in Wheatley. Details regarding road access from west and east, together with various traffic modelling schemes are included in the amended proposal. However welcome, **this modelling is at times confusing and opaque.** Figures and diagrams are sometimes unhelpfully cross-referenced between documents (e.g this reader can not find certain drawings related to modelling at Park Hill roundabout.) An independent professional traffic assessment of modelling and conclusions is needed. It would also be worth asking GVA to visit the A40 flyover at rush hour(s), especially in the morning, to include in current modelling the effect of numerous school students using the two zebra crossings both sides of the (painted) roundabout. **The necessary use** of these crossings interrupts traffic flow and it is not clear how this is factored into the modelling.

Improvement to cycle and pedestrian access to Wheatley and Holton begins with the existing infrastructure. There has been no attempt to consider shortening pedestrian transit time to Wheatley by proposing a pedestrian bridge over the A40 **at a location east of the A40 flyover** as was first proposed by WNP.

**2.6** The proposal addresses the reduction of A40 traffic noise to protect the OBU site, especially for homes along its southern perimeter. Details of the design of the bund however, are limited. It would help if the proposal described this bund design as **imperforate, providing maximum acoustic attenuation.** Furthermore the bund will be several metres high, easily seen from locations such as Ladder Hill, Wheatley. Its visual impact should be mitigated and measures taken to blend it into the natural contours. The OBU site was once Holton Park, surrounded by a stone 'deer wall' of which many sections remain intact. The original southern section of the wall was sliced/separated from the remainder by the new A40 dual carriageway in 1970. GVA should consider incorporating a new stone wall (as high and in keeping with the original, as Taylor Wimpey did at Mill Green on London Rd Wheatley) as part of the acoustic bund, thereby reducing the undesirable visual features of modern panelled bunds.

### **3. From Kevin Heritage, WNP Committee / Business Manager, Wheatley Park Academy.**

**3.1** Fish-ponds, medieval or later, and perhaps drained during the military hospitals eras, have been visible on the south-western edge of Holton Park since the 1960s. They are not on the plan, but lie under the large group of trees adjacent to the A40 near the western perimeter of the boundary. The area is not built on.

**3.2** The proposal respects the Green Belt to the northwest. Trees seem to have been maintained and hopefully will be planting many hundreds more on the bunds against the A40. These do not appear on plans anywhere yet are environmentally essential to cut noise and air pollution.

**3.3** WNP supports the 'approximately 300', although not the ambiguous, uninformative way its is described in the emerging Local Plan as 'at least 300' homes. This has twice been singled out by OCC as meaningless wording. Road access through The Park is also essential to the development, but the risk of problems of serious congestion from 7 directions inside the Holton/Wheatley exit from the A40, is worsened by the increase from 300 to 500 homes. It concerns WNP and its community seriously.

**3.4** The school has increasing fears for security. We would need a large grant to create several more gateways and a secure barrier / fence around the site. The current main car park in the west would need to be secured as would access and parking to/by the main school building and the SODC Sports Centre with its public access and parking.

**3.5** Easy access to Holton would have to end, particularly by the Venison House and adjacent to The Barns, and on the western edge a new pedestrian gate would have to be provided, open only in school hours and within a much stronger security fence. **These security changes would cost several hundreds of thousands of pounds**, which neither the Academy nor its Trust could cover independently.

**3.6 Without this new extended security, the site would become an open extension of the new housing development:** much more traffic cutting through the western edge of the school site all day and every day, the incursion of strangers into the grounds and the security of 1200 students and school property. This could be an unacceptable risk for all.

**3.7 OFSTED Inspectors can now downgrade a school with a FAIL, or REQUIRES IMPROVEMENT judgement on the issue of security alone.** Wheatley Park Academy, currently rated GOOD and now aiming for OUTSTANDING, would be seriously knocked back were it unable to implement security in a dramatically changed context.

**4. From Audrey Parsons, WNP Committee, bio-med. scientist & Tree enthusiast/WNP surveyor**

I have seen the Brookes Tree Retention Plan and append below details from SODC's latest tree survey (and corresponding WNP Numbers from the Committee's own survey of Holton Park Trees, July-November, 2017, duly forwarded and acknowledged by SODC)

**4.1. If trees and space have to be lost** I would want to keep more open/green space, and particularly right of the area where the ponds lie.

**4.2.** Of the more 'exotic trees' (Notable Species etc, incl. Eucalyptus, Ginkgo biloba, Sequoia, Mulberry, Noble Fir, Persian Ironwood, Weeping Ash, and Davidia Involucra) the above three have been proposed for removal. There is no mention of Noble Firs in the Survey for the proposal.

Reference: WNP Website, Evidence Base [EB]:

**EB** Research/Survey **20**, WNP Tree Survey, A Parsons and D. Mancy, 2017

Tree No.	WNP No.	Species	Age Class	Overall condition	Structural condition	BS5837 Cat
T1278	57	Wellingtonia Sequoia giganteum	EM -Early mature 1/3 – 2/3 life expectancy	F - Fair: minor rectifiable defects or early stages of stress	Notable tree , even form, no visible major defects	Category A(1) - High quality; estimated life expectancy at least 40 years.
T1009	38	Persian Ironwood Parrotia Persica	M - Mature over 2/3 life expectancy	F - Fair: minor rectifiable defects or early stages of stress	Notable species, spreading form	Category B (1) - moderate quality; estimated life expectancy at least 20 years
T1081	9	Weeping Ash Fraxinus excelsior	M - Mature over 2/3 life expectancy	F - Fair: minor rectifiable defects or early stages of stress	Many pruning wounds, branch stubs and dead wood	Category B (1) - moderate quality; estimated life expectancy at least 20 years

**5. From Chris Hallsworth, WNP Committee, former European Engineering Manager, Shell Retail .**

- 5.1 On the disagreement about 300 vs 500 homes, between GVA, SODC Local Plan and emerging Neighbourhood Plan, may I comment from several angles:
- 5.2 WNP have advocated approx. 90 houses in their 'enhancement' proposal for Wheatley. This is in addition to the 51 new homes now at Mill Green on London Rd in which WNP had no 'say', and the 15 new homes at The Railway Site. It would mean that Wheatley would have seen 456 (if 300 are built on OBU) or 656 (if 500 are built on OBU) new homes. These represent respectively 28% and 40% of the existing Wheatley housing stock. Even with just 300 homes on OBU and no other development or enhancement at all, we exceed the national guideline growth provision by a factor of two.
- 5.3 I believe we have information about schools and medical practice which suggests that 300 on the OBU site is manageable, but 500 is not.
- 5.4 Development on the built footprint is a given, but expansion onto virgin Green Belt is not. The only driver to expanding onto this area is commercial. There is no social need at all, given that 300 houses will bring Wheatley's expansion to 28% since 2017. Moreover, as these houses are technically in Holton (though serviced by Wheatley) 500 houses would see Holton village increase by 270% - a truly ridiculous proposition which pays no heed to the impact on that village.
- 5.5 It should be stressed that these houses will be served by Wheatley's existing social and retail infrastructure which will create considerable new demand for journeys across the A40. Unless these are made quick and safe journeys for pedestrians and cyclists, people will default to using cars. Even a cursory examination of parking in Wheatley shows the existing shortage and that little if any space is available to extend what parking provision there is.
- 5.6 The application acknowledges it is essential that the development be connected to bus routes. However the proposed primary access road of two lanes width is completely inadequate for this purpose. Unless the road has parking restrictions which are rigorously enforced (neither Police nor County can provide this service) then a bus will either be blocked or become the blocker. GVA are paying lip service to bus provision here.
- 5.7 Parking provision at the Sports Pavilion is still inadequate
- 5.8 The proposed acoustic bund by the A40 needs to protect bedrooms too and would have to be about 5 metres high, making it around 30m wide, or wider if landscaped so that it blends harmoniously into the natural contours. I don't believe they have designed this into their layout.
- 5.9 Finally, why when they plan for an east and west access into the development, is construction traffic to enter just via the east end ? It is beyond my understanding. It would make life a misery for those on Old London Rd and Waterperry Rd.