

WNP Website, Evidence Base for WNP Response to LP 2034, February 2019.

14/19 Committee members and Associates responded. This is a collation.

The WNP Response, as posted, is short and to the point, but cannot match Local Plan complexity.

1. Proposals to change Green Belt status to Green Space status at STRAT14 puzzles and concerns WNP Committee. The rationale for it is unclear, even in Public Consultation. (NPPF 2018, Paras 133-137 limits change to Green Belt status.)
2. The eastern side of STRAT14 has an existing 'built form'; westward lies open park land of historic importance. References to 'built form' as a boundary disappeared after Draft LP 2033 of March 2017. Is the proposal for Green Space a 'slippery slope' or still good protection against overdevelopment, along with existing statutory protection for this historic park? If the latter, how can it be ensured to cover the area we believe appropriate, without a published, defined plan marking built-form area from undeveloped Green Belt/Green Space, which we can all use as a reference point?
3. To say STRAT14 is an 'Opportunity to be well connected to Oxford and surrounding settlements' could be said of any Green Belt land by any Oxford feeder road. To say 'Inset will allow most efficient use of a previously partly developed site' opens the door to development spread. If however we were to draw a firm line round the 'built form', then trade the detail either side of the line to allow designers to create a beautiful place, the Green Belt boundary could then be created once development proposals have been approved. That line would be defensible. In March 2017, Draft LP 2033 actually cited in its Brookes site Policy Box 'approximately 300 houses on the built form'. The cycle track to Oxford does not make STRAT14 *exceptional*. Nor is cross-county housing need an *exceptional* reason to take this site out of Green Belt. The vaguely indicative sketch-map published for the Briefing on 03 January has not helped.
4. Maps for Consultation have confused Consultations on the strategic site since 2016. Stakeholder discussions (x 5) 2016-2017 with Oxford Brookes centred on building 500 homes maximum (rejected by SODC Planning Nov. 2018), but never featured 'approximately 300'. WNP requests that 'at least 300 new homes' (p. 73) be changed to 'approximately 300 homes'. OCC described 'at least' in February 2018 as 'non-informational'. The site still remains open to any figure proposed. See:- www.wheatleyneighbourhoodplan.co.uk, News and Articles: *Updating the Number 300*;
5. LP 2034, p. 75, para 4.128 needs rephrasing. STRAT 14 is not 'in the north of Wheatley', but lies in Holton, to the north of Wheatley'. These are separate parishes.
6. Capacities: Primary School capacity is frequently cited as a limit on development, whereas for example, Policing capacity is not mentioned. (Wheatley PC is now following this up with TVP on the completion of 51 homes at Mill View, where discussion was a pre-stated requirement.) IDP speaks of one or two more consulting rooms at Morland House Surgery and an additional bus to the commercial fleet. Housing proposals for Horspath and Garsington just west of Wheatley are in now the pipeline. Is the Infrastructure proposal for STRAT14 already dated / inadequate, and even sidetracking with the healthy, but cheap formula supporting cycles, prams and walking? Similarly a single extra bus means nothing to a community which lost the Miltons – Cowley - via Wheatley service in 2016 and which will lose the Brookes bus service in 2021. Strat 14 will generate 600 cars which will use Wheatley roads (as of right). This could be even more cars if the site is over-developed with 4/5 bed homes. WNP Committee brief to listen to the community over 3 years has shown us clearly that Traffic Infrastructure capacity is our community's major concern. While they are

promised by statute 'adequate Infrastructure' to match approved developments, the evidence is of weak and economised proposals, and even failure even to include traffic in development responses.

7. That traffic generated by development of STRAT14 is to be met with cycle and pedestrian way-widenings on the Holton and Wheatley A40 flyover is inadequate. The flyover leads to and from the two parishes in both directions of the A40: the slip roads both ways are themselves two-way roads. Wheatley is uniquely a hub-village, not just a large village, and includes clinic facilities, schools, a large industrial estate, and access to the M40 for an extensive part of south Oxfordshire. No HGV limit governs access from the A40 to the two villages, and a large secondary school stands at the northern A40 junction. There is no proper HGV access to the industrial estate or superstore from the eastern end of the village and presumably the 18th century river bridge is a consideration. The imposition of further traffic without further capacity on a two-mile slip road to the M40 has been a community and Oxfordshire County concern since 1960 (A40 Wheatley bypass) and 1990 (M40 junction 8A, Wheatley Service Station, open to all non-motorway routes).
8. LP 2034, cites Oxfordshire CC (Infrastructure Delivery Plan p 45) as saying Wheatley Primary 'can accommodate up to 500 households', yet OCC responded to Brookes University Outline Planning Proposal in 2018 stating 'generation from approximately 300 households at Wheatley can be accommodated, but there would be a capacity issue if more houses were proposed'. A contradiction is apparent.
9. Draft LP 2034 treats Brookes Campus as a single parcel, despite its significant size. Its existing built-form offers a chance to deliver more sensitive development responding to the heritage assets and surrounding countryside. The western undeveloped part is particularly sensitive in heritage and landscape, with its medieval church and park, and important links with both sides in the Civil War. Why can this site not be considered as two parcels, allowing the west undeveloped part to remain in Green Belt ? Land Use Consultants [LUC] in *Green Belt Assessment of Strategic Sites* note (3.4) that traffic generation was 'a key element in any decision-making regarding the release of Green Belt land for housing development'.
10. District-wide, LP 2034 advocates a 50% increase in homes on the 56,000 of 2011, to about 84,000 by 2034. Between 1991-2011, dwellings in SODC increased by 10,000. Housing Needs Assessment needs more extrapolating of trends, now that we have Brexit looming and an end to migration growth. This housing target looks excessive. The Expressway, Oxford to Cambridge, has now been thrown into the equation, with no consultation, much secrecy and adding further, unnecessary complication to planning already complex at all levels – Local, Neighbourhood, Strategic and Infrastructural. A considerable local worry, it saps community energy, emotion and concentration, when local needs and development are crying out for attention.

John Fox, Chairman WNP,
February 2019

WNP Committee convened in January 2016. It is about to begin final Public Consultation on the Draft Wheatley Neighbourhood Plan, before submitting it to Examination.
