

**PUBLIC CONSULTATION**  
**Response to Inspection Comments on Modifications of Draft Local Plan 2034**

**1. Preservation of Arboriculture**

The historic setting of the OBU site as part of Holton Park is devalued when historic parkland trees are restricted only to those with TPO orders. Two WNP Committee scientists (including a botanist/ecologist), cooperated with the Forestry Officer / SODC, on additional tree research at Holton Park. Sharing local knowledge and expertise was stipulated [Localism Act 2011] as central to Neighbourhood Planning. WNP Website [[wheatleyneighbourhoodplan.co.uk](http://wheatleyneighbourhoodplan.co.uk)] Evidence Bases exemplify this, especially important at a time of 40% austerity in Local Authority staffing. The Forestry Officer has earned our local trust, and we his, in our collaboration. [*WNP Website, Evidence Bases, Research and Surveys 20; Maps 4*]. Holton PC and Wheatley PC (through WNP sub-Committee) should be invited to continue support for SODC in any updating of the TPO list, prior to development.

**2. Clarity about the extent of development**

The extent of the permitted development is still referred to differently in three different parts of the text, viz:- p.74, '*approx. 500 homes*'; p.76, '*up to 500 homes*'; and p.230, '*at least 500 homes*'. This inconsistent qualifying of the final appeal figure prolongs the ambiguity and argument caused since Strategic Site 14 was launched for '*at least 300 houses*' on 31 May 2016. Even the SODC Planning Officer queried it as '*imprecise*'. On 20 November 2017 Oxfordshire CC stated '*at least*' provides little guidance and should be replaced with '*approximately*'. Why are ambiguous qualifying words still being used in 2020? They fuel mistrust. WNP requests the precision of '*no more than*' or '*up to*'.

**3. Attention to the Climate change crisis.**

**a) Noise pollution** A key NP asset is local knowledge. The WNP Website Evidence Base is an abiding reference collection, already cited. In 2017 survey of a modern development of homes along Old London Rd, Wheatley [immediately adjacent to, south of and parallel to the A40] revealed that windows had to remain closed over several summers, at first on ground floors, then on upper floors, due to fume pollution and to noise from the open dual carriageway embankment only yards above them. [*WNP Website, Evidence Bases, Research and Surveys, 14 and 16, Old L.Rd, 2017-18.*] The Inspector's welcome stress on climate change and pollution issues fails to mention noise pollution from the A40, often severely impacting much of Wheatley. The Secretary of State judgement, 23 April 2020, demands clearly and directly a suitable noise bund for the OBU development [*p.93, para 18*]. This is welcome, but it must be recognised that the A40 parallels the whole of Wheatley's linear extent. Immediately west of Old London Rd (ref. lines 2-5 above), on London Rd, the Mill Green development (xx homes, 2017), has a high wooden-fence baffle between it and the A40 dual carriageway below. However marginally effective, this does acknowledge the A40 noise issue. North of Old London Rd, the A40 runs high on its own exposed embankment, not in a 'canyon'. The unmitigated noise especially with the prevailing wind affects badly gardens in summer use over a wide section of the village. The absence of traffic noise during lockdown in spring and summer 2020 brought home the contrast.

**b) Air Pollution** The Secretary of State judgement, April 2020, upheld the application for 500 homes, against the original 300 recommended by SODC. By implication, 1000 domestic vehicles, rather than 600, will contribute further to noise and fume pollution, not to mention congestion. It should further be noted, that Wheatley and the OBU site now lie within a strategic roadway complex, developed since 1965. The A40 dual carriageway (1965+) borders the historic site along its southern length. It actually cuts into the south-eastern section of the site. The site lies 1.75 miles

from M40 Junction 8A (1990), where a major Service Station (Motel, HGV park, shops, fully accessed by M40 traffic and by all 'local' road traffic from every direction.) is a large landmark. OBU site also lies less than a mile [0.87 mile] from the M40 heading northwest from Junction 8A.

In the light of this, and as the Secretary of State states his expectation that an increased OBU development will have access to the proposed future Oxford - Milton Keynes – Cambridge highway, we request that a stronger assurance in principle of coordinated and standardised up-to-date measures against increasing noise and air pollution be made explicit in the Climate Change Policy for this whole essentially new highway interchange area. Wheatley and Holton are the only village settlements within the new road complex.

A year ago, new ventilated metal fencing panels were installed at Stokenchurch to shield housing from M40 noise (and perhaps fumes). As Wheatley is a similar village within this highway complex, it would seem prudent and right firstly to replace the current extra-high garden fencing installed at the Mill Green development, and secondly to shield the Old London Rd from the A40 embankment noise.

The WNP Committee formally welcomed the new community at Mill Green in 2019 by visiting each of 60+ homes. The new residents welcomed us warmly, were glad of the housing, but clearly realised that the *constant* noise was part of its price – and a talking point. OCC accepted in 2011/12 that the A40 noise had already been 'highlighted'. [WNP p.14, Fig 4.3]. The issue of noise and its insufficient mitigation begs the question as to why the construction of new homes so close to major roads is still encouraged.

#### **4. Integration of Communities and the Traffic Issue**

The Inspection (p.41) speaks of developments 'well-related to existing towns and large villages.' Wheatley is designated as one of 12 large villages in South Oxfordshire. The WNP Consultation Statement [August 2019] described the proposed Strategic Site 14 development as 'close [*to Wheatley*] but isolated by its own landscape' (p. 4). The four-lane A40 along its north, starts like a sunken dry moat in the west, but by the eastern end of Wheatley becomes an elevated embankment, dividing the new settlement site from Wheatley village. On the western end a 1960s flyover links the two across the 'moat'. On the eastern end a B-road from Waterperry bridged by the embanked A40 is the only other exit-entrance from the OBU site. Preliminary WNP discussions with Oxfordshire CC in January 2018 suggested that there would be no further links and that the flyover would simply have to be further subdivided to take more walkers/cyclists. The planned vehicle entry and exit / directional controls onto the new site should be publicised by SODC Planning as a priority. Current school buses, parent drop-offs, pedestrian youngsters aiming for service buses on Park Hill, parents from the new site taking children to Primary School across rush-hour Wheatley, and the present daily packed rush hours into, across, and out of Wheatley, must be considered and put to discussion, either by the Inspector or the Local Plan. Local objections to the 500 homes are now in the past, but resolution of the serious issue of Wheatley traffic is now at its most urgent, after decades of neglect. We request that the Inspector recommend this renewal of emphasis in the Local Plan for this Strategic S 14.

OCC described Wheatley as a 'rat-run' in 2012. [WNP, p.14, Fig 4.3]. WNP cites the OCC traffic archive only, in its plan. Now, post Examination, WNP is able to speak more freely and with some authority. The rat-run has worsened and it affects village life. The WNP Committee has worked for five years with full community backing to represent local concerns. The community are clear that the traffic burden is their greatest concern. [WNP: *Transport and Movement* 4.22-4.27]. This includes the sheer numbers of vehicles, especially at two cross-regional rush hour periods. Within the community, personal safety especially for mothers and children crossing the congested village to

and from primary school is a high priority issue. We have narrow pavements (where they exist at all), some like Station Rd were last constructed in 1923, unfit for mobility scooters and mothers with children and buggies and even walking in pairs. The WNP Committee members have accompanied both. Noise and pollution simply increase unabated. HGV intrusion comes in the early hours, from the M40 and from the expansion of Corporate Farming, adding to the road damage bill.

A final concern needs presenting. Central Wheatley is a Conservation Area full of listed buildings. Many of them are built of local soft limestone. The lower bands of stonework on Church Rd [*Sun Inn* area] and parts of High Street, the historic centre, are perishing as pollution pulverises the stone. The danger of destabilised buildings is now with us, as is the householder repair expense.

The WNP Committee was precluded by the Localism Act 2011 from promoting vehicle/road infrastructure issues until our Plan was passed by Examiner. This has been observed to the letter. Now that the WNP has been passed, the Wheatley and Holton community has a right to be assured that traffic infrastructure, its prior concern, will now be taken seriously at every level. As the only Neighbourhood Plan in the area of STRAT 14 and of Oxfordshire's newest and busiest Motorway complex, we would still welcome a meeting with the Inspector.

**John Fox** Chairman

**Roy Gordon** vice-Chairman

Wheatley Neighbourhood Plan Committee.

October, 2020