

**Land at Old London Road,
Wheatley**
**Representations to Wheatley
Neighbourhood Plan**

Taylor Wimpey

30 June 2017

LICHFIELDS

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1.0 **Executive Summary**

- 1.1 Taylor Wimpey is promoting the land at Old London Road (site WHE 2 within the Wheatley Neighbourhood Plan (WNP)) for residential development.
- 1.2 Our client supports the efforts of the Wheatley Neighbourhood Plan (WNP) group in producing a Neighbourhood Plan. They welcome the comprehensive research and analysis undertaken in preparing the plan and also support the flexibility sought within this recognising that the preparation of the South Oxfordshire District Council (SODC) Local Plan 2033 forms an ongoing process and that (WNP para 1.8) *“any neighbourhood plan may provide more than the proposed number of houses . . . but there is no provision for neighbourhood plans to provide for less than the proposed amount of development.”*
- 1.3 As set out below, these representations focus on site WHE 2 and its appropriateness for residential development. The identification of further potential housing site(s) within the WNP is particularly important bearing in mind both (i) the concerns identified about the ultimate yield that may arise from the Oxford Brookes University (OBU) site (WHE 25 as identified in the WNP) and (ii) the substantive concerns raised by numerous objectors to housing strategy within the emerging SODC Local Plan 2033¹.
- 1.4 Accordingly Taylor Wimpey agree with the WNP (para 6.1) that *“it is still appropriate to identify sites for possible development with well defined characteristics that reflect the needs and wishes of the residents and provide community benefits for the foreseeable future.”* This will be increasingly important if, as Taylor Wimpey anticipate, a shortfall in residential yield of the OBU Campus and / or the SODC Local Plan 2033 process necessitates the delivery of further residential development within Wheatley

Suitability of WHE 2 for residential development

- 1.5 Wheatley forms one of the most sustainable settlements within South Oxfordshire with excellent connectivity with Oxford City Centre and site WHE2 forms a sustainable location within the village being 250m from nearby employment, around 900m to the centre of Wheatley and less than 100m from the nearest bus stop.
- 1.6 Substantive survey work commissioned by our clients has confirmed that the site is capable of delivering around 80 dwellings for the village in the near future, and assessments on noise, access, ecology and arboriculture have not identified any constraints at the site. It is available immediately and could be delivered in its entirety in the first five years.
- 1.7 Furthermore, whilst forming Green Belt land it was identified for potential release from the Green Belt within the Local Green Belt Study for South Oxfordshire District (2015) alongside four other sites (one of which has since been developed). A more recent assessment of the sites performance against Green Belt criteria, undertaken for Taylor Wimpey by EDP, confirms both that the site makes a limited contribution to the purposes of the Green Belt and that two of the other undeveloped sites identified perform better against the Green Belt criteria – further justifying the release of the site from the Green Belt.
- 1.8 Our client is therefore promoting site WHE 2 for residential development within the WNP and wishes to work with both SODC and the Wheatley Neighbourhood Plan group to assist in meeting the objectives of the Neighbourhood Plan.

¹ These include the failure of SODC to comply with the duty to co-operate and a housing delivery strategy which is heavily reliant on delivery from strategic allocations which do not necessarily comprise sustainable development.

2.0 **Introduction**

2.1 On behalf of our client, Taylor Wimpey, we are pleased to enclose representations to the Wheatley Neighbourhood Plan (WNP) in relation to land at London Road (Site WH E 2 within the draft WNP).

2.2 These representations are accompanied by :

- A Site Location Plan;
- Landscape Position Statement and Green Belt Review prepared by The Environmental Dimension Partnership (EDP) (June 2017); and
- Constraints, Opportunities and Indicative Masterplan (June 2017) prepared by Lichfields.

Background

2.3 Our client's representations focus on the need for the WNP to deliver an appropriate level and type of housing provision and the suitability of this site to provide such residential development.

2.4 The site has long been regarded as a potential development location – it has been considered in the South Oxfordshire District Council (SODC) Strategic Housing Land Availability Assessment (SHLAA) July 2013, the Local Green Belt Study for South Oxfordshire (2015) and the most recently the SODC Housing and Employment Land Availability Assessment (HELAA) January 2017. We summarise these analyses subsequently.

2.5 Taylor Wimpey, through Lichfields, are promoting the site through the South Oxfordshire District Council (SODC) Local Plan 2033 process and have submitted representations to both the Local Plan Preferred Options consultation in August 2016 and the SODC Local Plan 2033 Second Preferred Options (LPSP0) consultation (and the corresponding SODC HELAA Call for Sites) in May 2017. We draw on these earlier representations within this response.

2.6 Our client has completed a number of detailed technical assessments and preliminary design analysis which underpin these representations and again these are summarised subsequently.

Taylor Wimpey

2.7 Taylor Wimpey is a national developer with a successful track record of building high-quality new homes across the county, including a predominantly affordable homes development on land north of London Road, Wheatley. In recent years they have completed an average of 13,500 new homes each year and in 2016 delivered 2,663 affordable homes. Within Wheatley they are currently building 51 homes (with associated landscaping and open space provision) on a rural exception site at London Road (LPA ref. P15/S2121/FUL). Three quarters of these homes are affordable housing.

2.8 They are committed to adopting sustainable practices to provide places to live with appropriate facilities, an attractive environment and a sense of place.

2.9 Moreover they seek to add social, economic and environmental value to the wider communities in which they operate. This includes working with local people, community groups and local authorities and keeping them informed about works, both before construction and throughout the life of the development. Getting the basics of homebuilding right first time, such as quality, customer service and health and safety are key priorities for them.

- 2.10 Finally they work with selected subcontractors and use carefully sourced materials to make sure that their homes are built safely, efficiently and have as little effect as possible on the environment.

Scope of Representations

- 2.11 Taylor Wimpey supports the efforts of the Wheatley Neighbourhood Plan Committee in seeking to produce a Neighbourhood Plan which addresses the matters facing Wheatley through a comprehensive and flexible approach. They recognise the substantial time and resources committed by the local community in preparing this plan and welcome the extensive evidence base being gathered as part of this process.
- 2.12 As expanded upon subsequently, the focus of these representations is that Wheatley is an appropriate location for residential development. There remains considerable uncertainty as to what the quantum of residential development it will be necessary and appropriate for the Village to meet. The emerging SODC Local Plan 2033 expectations have varied greatly (WNP para 1.4) and are still unresolved as the plan is not yet at the Submission Stage and has not been assessed by a Local Plan Inspector. The WNP must meet the (as yet uncertain) requirements within the SODC Local Plan 2033 and *“may provide more than the proposed number of houses and amount of retail and leisure floorspace set out in the [final] SODC Local Plan 2033.”*
- 2.13 Furthermore, as the WNP acknowledges (para 7.7) the two main sites identified for residential development within the plan (sites WHE 18 and WHE 25) *“may . . . not be able to fulfil all the needs identified by the WNP.”*
- 2.14 In this context it is entirely appropriate for the WNP to incorporate flexibility to respond to one or more of these circumstance and consider the scope for further residential development sites. The site put forward by Taylor Wimpey (Land at Old London Road – WNP ref WHE 2) forms such an appropriate location – and our subsequent representations focus on the appropriateness of this site for both release from the Green Belt² and subsequent residential development.
- 2.15 Specifically our representations address
- Housing Need which the WNP must respond to (section 3.0);
 - The appropriateness of Wheatley for further residential development (section 4.0)
 - Site WHE 2 and the potential for residential development on it (section 5.0);
 - An assessment of the site against Green Belt criteria (section 6.0); and
 - Changes sought to the WNP (section 7.0)

3.0 Housing Need

- 3.1 The National Planning Policy Framework (2012) outlines the requirement on Neighbourhood Plans and states:

² Recognising that Green Belt release is a matter for the SODC Local Plan 2033 – the Second Preferred Options Draft states (para 5.25) “potential development in Berinsfield and Wheatley is restricted by the Green Belt and, at present, making changes to the Green Belt is beyond the remit of NDP. However, **we do not want to suppress the appetite and hard work of the neighbourhood development plan groups in these communities and we will continue to support proposals made through robust and evidenced NDP**” (our emphasis).

“Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan... To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible.” (Para. 184)

- 3.2 Paragraph 184 of the NPPF continues *“Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”*
- 3.3 As noted above the emerging SODC Local Plan 2033 is some way off adoption and the most recent iteration, the Second Preferred Options, is the subject of numerous unresolved objections. Within this draft Policy STRAT2 states that provision will be made for at least 17,050 dwellings across the District. Draft Policy STRAT10 allocates Oxford Brookes Wheatley campus for the delivery of approximately 300 homes.
- 3.4 One key ongoing area of dispute in the preparation of the SODC Local Plan 2033 relates to housing need and distribution. Whilst we do not seek to repeat the representations submitted by Taylor Wimpey to SODC (May 2017) on this matter in summary they noted :
- forecast employment growth and affordable housing need both indicate that a higher level of housing need should be planned for;
 - the draft Local Plan fails to demonstrate compliance with the “duty to cooperate” in meeting unmet need from within Oxford City Council;
 - the emerging plan is over-reliant on housing delivery from four strategic housing sites; and
 - there are a number of fundamental concerns regarding the proposed approach to housing delivery with the draft Local Plan – which Taylor Wimpey consider means that the plan will fail to deliver sufficient residential units or to provide housing in sustainable locations
- 3.5 In the light of these concerns Taylor Wimpey’s representations concluded that their view is that the SODC Local Plan 2033 will not be found sound.
- 3.6 The appropriateness of Wheatley for further residential development (including assisting in meeting unmet need from Oxford City Council) and the concerns identified within the WNP (including the uncertainty regarding the residential yield from the Wheatley campus) means that there may well be a requirement on Wheatley to accommodate further residential development and the WNP needs to be sufficiently flexible to respond to this.
- 3.7 It is therefore necessary and important to have regard to alternative sites within the village which are suitable for housing development to ensure that the overall housing need is met and the WNP remains compliant with Para 184 of the NPPF.
- 3.8 This is before evidence of specific housing need within Wheatley and doubts about the housing yield from the OBU Campus are addressed (which we summarise below).

Housing Need within Wheatley

- 3.9 WNP (table 4.1) references the Housing Needs Survey compiled by Community First Oxford (CFO) which highlights a number of key aspirations outlined by residents in Wheatley and Holton. These include:
- An appetite for downsizing (26% of respondents might be interested);
 - The lack of suitable/affordable housing being given as a major reason for individuals leaving the village (36% of leavers);

- Strong support for affordable housing (63%), starter homes (53%) and supported housing (47% - with preference towards independent accommodation with care);
- Strong support for owner occupied/shared ownership properties; home ownership is preferred among families/individuals wishing to move within the next 5 years (80%);
- Most families/individuals wishing to move require 2+ bedrooms (90% of respondents); and
- Demand for housing from households living outside Wheatley; the greatest demand is for 2 and 3 bedroom properties.

3.10 This valuable analysis arising from the WNP process highlights the wide ranging housing requirements of both current and potential future residents which the WNP must seek to accommodate as a key part of its housing delivery strategy.

Housing Yield from OBU Campus

3.11 In addition, both the emerging SODC Local Plan 2033 and the WNP highlight doubts about the ultimate delivery from the Wheatley Campus.

3.12 The emerging Local Plan recognises that the Wheatley Campus will need to respect the listed building and its setting, provide an appropriate buffer to protect the scheduled monument and retain existing sports pitches (Draft Policy STRAT 10).

3.13 Furthermore the WNP recognises (para 3.8) that *“it is only the existing built form that is designated brownfield and therefore provides an opportunity for redevelopment.”* Furthermore (para 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 space will reduce the land available for residential development.”*

3.14 In essence, as both the draft SODC Local Plan 2033 and the WNP highlight, there is no certainty of the ultimate residential yield from this site and it is important for the WNP to have flexibility to address this.

4.0 Wheatley

4.1 In addition to the clear housing requirements identified by local residents, Wheatley is widely recognised as forming an appropriate and sustainable location for further residential development – as summarised below.

Oxford Growth Strategy 2016

4.2 The Oxford Growth Strategy (May 2016) prepared by Oxford City Council identifies potential locations within the surrounding Districts to meet Oxford’s unmet need. The Strategy includes three locations within South Oxfordshire – Wheatley, Wick Farm and Grenoble Road. In respect of Wheatley, the report acknowledges the areas relatively good access to jobs and local services and its proximity to the centre of Oxford (page 14).

Draft SODC Local Plan 2033 Evidence Base

4.3 The SODC Sustainability Appraisal includes a matrix for the Wheatley Campus (Appendix A, Table 9). This clearly identifies the strong sustainability credentials of Wheatley stating that:

- Wheatley has a post office, a branch of Barclays bank, an Asda supermarket, a Co-Op pharmacy, several shops in the High Street, and numerous village societies....a number of public houses. There are a number of pre-school groups, a nursery school, a primary school,

and a school for pupils with learning disabilities, and a secondary school. The County Council believes there is capacity of the primary school to accommodate new development. Wheatley offers a wider range of services with the ability to act as a local centre as part of the network of settlements in the north west of the district, resulting in positive effects in terms of new housing development (page 3);

- Releasing some land from the Green Belt for housing and required services will support the village in the long term (page4); and
- Buses to Oxford City buses [sic] run every 30 minutes, journey time approx. 40 minutes. National Cycle Route 57 passes through Wheatley and utilises Church Road to the south of the [Oxford Brookes] site. The route links Oxford with Thame (and beyond)...A local traffic free cycle route also begins in the vicinity of Wheatley Park School and provides access into the north of Oxford following the route of the A40. Therefore positive effects are identified in terms of transport and access to employment (page 6).

Wheatley Neighbourhood Plan (May 2016)

4.4 This notes that Wheatley is a major hub serving surrounding villages in retail, light industry, education and medical practice and is described in the emerging Local Plan as a Local Service Area (Para 3.1). In addition

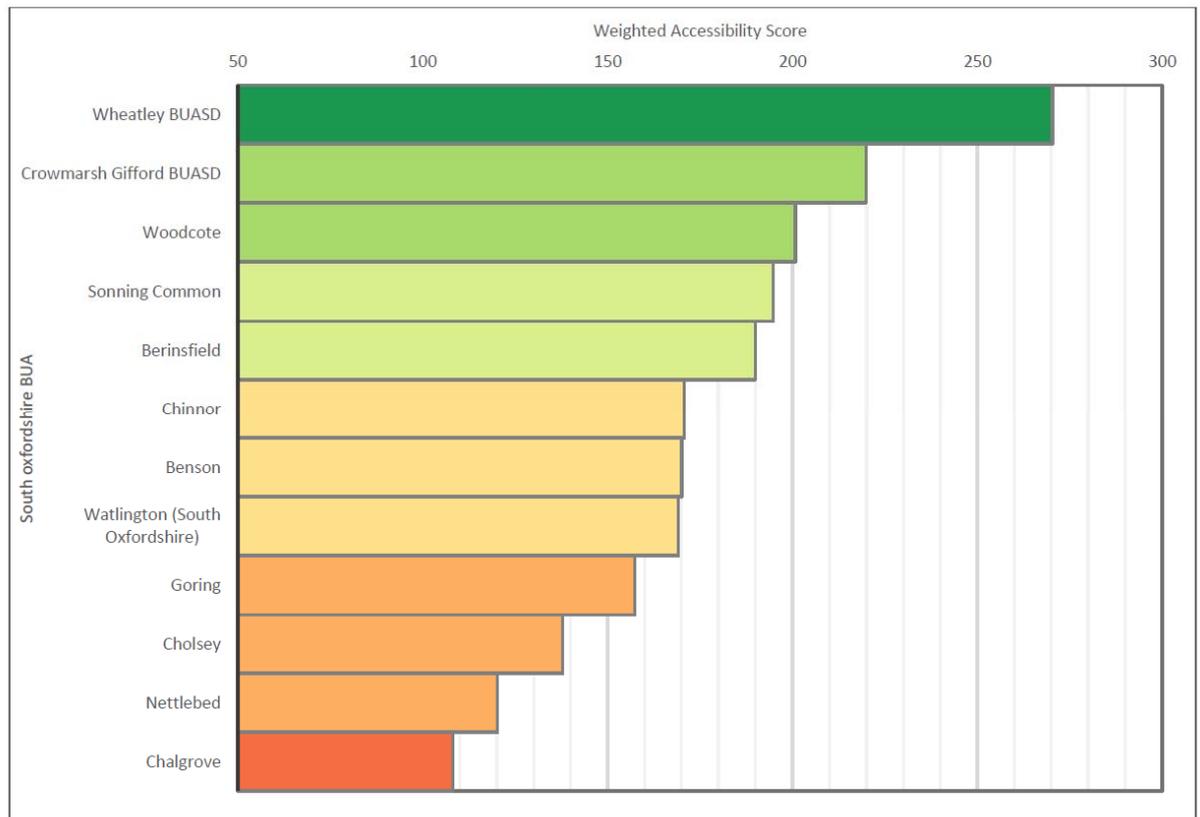
- Wheatley has access to London and Oxford, access to three railway stations by bus, the village facilities including schools and surgery, its community spirit, a wide range of organisations and the setting and history of the village (para 3.9)
- The GP and district nursing services are based at Morland House.
- Unusually for Oxfordshire villages, Wheatley and Holton between them have the full range of state schools: Wheatley Primary Academy and Wheatley Park Academy (run by different trusts) and a special school (John Watson) with junior and senior levels. These schools also serve other villages and the nearby suburbs of Oxford City (Para 3.12)
- Wheatley Park, with 1019 pupils on roll in March 2016, believes it has accommodation for 180 more pupils; OFSTED disputes this and suggests a figure of 330 more places. (Para 3.13).
- The retail activities are as summarised above (Para 3.15).
- There is a light industry park which includes four plant and building materials suppliers together with a garage business and also there is a business park (Wheatley Business Centre). Four car workshops are sited at Littleworth (Para 3.16).
- The bus services are as follows:-
 - i 275 to Oxford - High Wycombe (Operational)
 - ii 280 to Oxford – Aylesbury (Operational)

4.5 The evidence base is therefore clear and consistent that village forms an accessible and sustainable location with both good accessibility to Oxford City and a significant range of retail and public services.

Accessibility relative to other large villages

4.6 To complement this analysis Taylor Wimpey have undertaken an assessment of the accessibility of Wheatley relative to the other large villages in SODC (Calibro Consulting - May 2017)³. This assesses accessibility by regard to a number of criteria and concludes that Wheatley is not only a suitable settlement for residential development but is the most sustainable location for such development compared with other comparable settlements within South Oxfordshire.

Chart 4.1 Accessibility of Wheatley relative to other settlements



Source: Accessibility Assessment prepared by Calibro Consulting (May 2017)

4.7 This is entirely consistent with the analysis within the analysis within the emerging Local Plan evidence base and the emerging WNP.

5.0 Site WHE 2

5.1 The site is in a sustainable location, being 250m from nearby employment, around 900m to the centre of Wheatley and less 100m from the nearest bus stop. Moreover, the site is situated approximately 0.4 miles south east of the proposed new allocation at the Oxford Brookes campus, which has been identified as a sustainable location for housing development in the emerging SODC Local Plan 2033 (Draft Policy STRAT10).

³ Taylor Wimpey are happy to make this analysis, which accompanied their representations to the Second Preferred Options to the SODC Local Plan 2033, available to the WNP committee

Previous Assessments of the Site

5.2 We summarise below the conclusions of previous SODC evidence base assessments of the site, before outlining the appropriateness of the site for residential development.

5.3 The Site has been considered in both the July 2013 SHLAA; SODC Green Belt Study September 2015 and the SODC Housing and Employment Land Availability Assessment (HELAA) January 2017.

SODC Evidence Base Document	Conclusion of site assessment	TW Comment
Strategic Housing Land Availability Assessment (SHLAA) July 2013	<i>'Site is available but is considered unsuitable in principle. The development of this site however will also be considered through the plan making process, during which its acceptability will be judged by comparison with other sites.'</i>	The main suitability constraints identified in the 2013 SHLAA are its location within the Green Belt and its topography. The site has subsequently been identified as having potential for Green Belt release (see below) and the topography of the site does not preclude development as this can be appropriately addressed within the design of the development scheme – see analysis below.
Local Green Belt Study 2015	Site WHE2, identified as Area 8, is outlined as an <i>'area that reflects few functions of the Green Belt'</i> (Page 69). The Study continues to note that <i>'the [Green Belt] boundary could be revised in five potential areas (Area 7, 8, 9, 10 and 11). The boundaries of 7 and 8 are formed by adjacent roads and built form and adjacent tree belts. The eastern boundary of Area 8 follows a strong hedgerow'</i> (Page 69).	Area 8 is site WHE 2. This matter is addressed in further detail both within the accompanying Landscape Position Paper and Green Belt Review
Housing and Employment Land Availability (HELAA) January 2017	Site WHE2, referred to as Site 954, was concluded to be <i>'suitable, available, and achievable'</i> for residential development.	

5.4 In summary, with the exception of the 2013 SHLAA analysis (which has been superseded by the subsequent design work undertaken by Taylor Wimpey – see below), the recent SODC evidence base assessment of the site highlight that it forms a sustainable location for residential development which is appropriate for Green Belt release and is suitable, available and achievable for development. The site is therefore capable of contributing to meeting the housing need within the village.

5.5 The SODC evidence base is consistent with the subsequent analysis undertaken by Taylor Wimpey which we summarise below.

Taylor Wimpey Analysis

- 5.6 In assessing the suitability of the site for residential development and the potential capacity for this Taylor Wimpey have commissioned substantive survey work on noise, access, ecology and arboriculture and this has not identified any constraints at the site. These assessments are summarised below and can be made available to the WNP Committee if this would be helpful.

Transport

- 5.7 An access feasibility report has been prepared by WYG which considers both the feasibility of access to the site and any cumulative impacts of development traffic on the local highway network having regard to the proposed allocation of the Oxford Brookes Wheatley Campus site.
- 5.8 The report concludes that vehicular access to the site is recommended via the provision of a simple priority T-junction on Old London Road. The report considers that this access would meet appropriate design standards to cater for the scale and type of development proposed and that the junction would operate within theoretical capacity in future years.
- 5.9 It also suggested measures to enhance the pedestrian and cycle accessibility of the site and these have been incorporated within the proposed masterplan.

Noise

- 5.10 An assessment of noise for the site has been carried out by Auricl to inform the illustrative Masterplan and assess any potential impacts of noise on future development of the site. This assesses daytime and night-time noise levels affecting the proposed development site.
- 5.11 It concludes that, even for the worst case facades at the noisiest site boundary, acceptable noise levels can be achieved within the proposed dwellings.

Ecology

- 5.12 Initial baseline studies have been undertaken for the site by EDP. These have confirmed that the site is not subject to any "*in principle*" ecological constraints, and offers sufficient flexibility to ensure compliance with paragraph 118 of the NPPF through the avoidance of 'significant harm' to biodiversity. Furthermore, an appropriately designed development incorporating appropriate mitigation and enhancement, has the potential to ensure no net loss, and possibly a net gain, to biodiversity.
- 5.13 On this basis, EDP finds that by virtue of the relatively limited constraint posed by the site's habitats and protected species interest, the scheme is capable of compliance with relevant planning policy for the conservation of the natural environment at all levels.

Arboriculture

- 5.14 An arboricultural survey has been undertaken by EDP. As part of the review of local designations, this found that the trees at the site are not subject to any TPO, and the site does not fall within or abut a Conservation Area.
- 5.15 Overall, the site contains two category A trees of high quality and value and five category B items, of moderate quality and value.
- 5.16 All of the surveyed items are located around the perimeter of the site and, providing that designated RPAs and canopies are respected, they do not adversely constrain the potential to accommodate residential development in the main body of the site.

Indicative Masterplan

- 5.17 An illustrative masterplan has been prepared which is informed by the site's constraints and opportunities (see accompanying plans). This has been updated slightly (rev IL115470/02-003). Since that submitted with Taylor Wimpey's representations to the Second Preferred Options of the SODC Local Plan 2033 (May 2017) in the light of a more detailed landscape assessment undertaken by EDP. These revisions include :
- The identification of a 15m tree planting area on the eastern boundary; and
 - The identification of a zone where housing will not exceed 2 storeys.
- 5.18 The illustrative proposes a central development area framed, and visually contained, by woodland and open space. This results in a development of up to 80 new homes with a mix of housing sizes across a range of tenures.
- 5.19 The principal access to the development area will be from Old London Road to the centre of the site, framed by retained woodland, with additional footpath connections to the northern and southern corners.
- 5.20 Upon entering the site, the development will overlook a wide area of open space which protects the setting of existing trees and could also accommodate drainage and open space. Landscape corridors to the north and south also protect the planting along the site's boundaries and provide a framework for amenity open space. To the west and adjacent to the A40, the landscape buffer can accommodate new woodland planting and noise mitigation measures such as a bund and or fencing whilst a new planting zone is provided to the east.. A continuous built edge adjacent to the A40 buffer will help further mitigate traffic noise and protect the amenity of gardens and habitable rooms within the development.
- 5.21 Furthermore, the detailed analysis and design work undertaken by TW confirms that the site is free from constraints, available, achievable and can come forward for residential development within the next 5 years.

Concluding Comments

- 5.22 In conclusion, and as recognised by the recent SODC evidence base, the land at Old London Road provides an ideal location to contribute to meeting housing need within South Oxfordshire including Oxford's unmet need given its proximity to the City, good transport connections and existing services.
- 5.23 The subsequent analysis undertaken by Taylor Wimpey confirms that there are no technical matters constraining the potential for residential on the site. Their illustrative masterplan proposals highlight that it presents an opportunity to contribute to the needs identified by local residents through the delivery a sustainable development of up to 80 new homes with a mix of housing sizes across a range of tenures.

6.0 Assessment against Green Belt Criteria

- 6.1 As noted above the Local Green Belt Study for South Oxfordshire District Council (2015) suggested revising the Green Belt boundaries around Oxford to release site WHE 2 (and four other sites) around Wheatley from the Green Belt. One of the other four sites has subsequently been developed as a rural exceptions site (summarised above).
- 6.2 Taylor Wimpey have commissioned the Environmental Dimension Partnership (EDP) to undertake a Preliminary Landscape Appraisal and Green Belt review of site WHE 2 and the

three other (undeveloped) sites suggested for Green Belt release within the Local Green Belt Study. This report accompanies these representations.

- 6.3 We do not seek to repeat EDP's analysis in full but in summary the review finds that site WHE2 makes a predominantly limited contribution to the purposes of the Green Belt, being entirely divorced from the wider designation by a recognised, permanent boundary to the north (the A40) and by an existing, recognisable landscape feature to the east. The existing settlement at Wheatley provides a permanent boundary to the south and west. Urbanising features include the existing settlement edge on two boundaries, overhead services and the A40 which also contribute to a substantial reduction in the sense of openness, when compared to the wider Green Belt.
- 6.4 NPPF para. 83 require local authorities to consider the permanence of the new Green Belt boundaries. The promotion site benefits from having three permanent boundaries and only one 'short' but recognisable landscape feature forming the eastern boundary. All boundaries lie south of the A40 and would not extend the settlement further east than the existing developed area south of London Road. The eastern boundary of the site can provide a defensible boundary to the Green Belt, and with enhancement and reinforcement, will ensure the protection of the landscape setting of the River Thames valley to the east of Wheatley.
- 6.5 Sensitive masterplanning of future development on the site can ensure the retention and protection of the existing tree and hedgerow features which provide some contribution to the perception of the transitional landscape between the Open Farmed Hills and Valleys and, the Semi-enclosed Farmed Hills and Valleys; these areas being defined in the Council's adopted Landscape Character Assessment. Development should however be restricted from the full area of the more elevated, north-western portion of the site, and instead siting of open space would allow for long distance views to the lower lying land to the east, to be retained. Internal tree planting will assist greatly in softening the appearance of development on the site, by reinforcing its enclosed appearance.

Comparative Assessment of WHE 2 and the other three sites

- 6.6 The EDP goes on to review the other sites which the 2015 Local Green Belt Study also identified as appropriate for Green Belt release against Site WHE 2 (the promotion site) against the five Green Belt purposes and this analysis is summarised in tabular form below.

Summary of EDP Green Belt Review

	WHE 2	WHE15 AND SURROUNDING LAND	WHE17	WHE13a
Purpose 1	Limited	Limited	Moderate	Moderate
	Limited	Limited	Strong	Limited
Purpose 2:	Limited	Limited	Limited	Limited
	Limited	Moderate	Limited	Moderate
Purpose 3	Moderate	Limited	Moderate	Limited
	Limited	Limited	Moderate	Limited
Purpose 4	No	No	No	No
Purpose 5	Yes	Yes	Yes	Yes

6.7 In summary the EDP green belt review finds that all sites only perform moderately in terms of satisfying the functions of the green belt around Wheatley settlement which is consistent with the findings of the Local Green Belt Study which concluded that these sites possessed “*few essential characteristics of the green belt*”.

6.8 In terms of ranking, site WHE2 as well as sites WHE15 (and surrounding land) have the weakest performance against the Green Belt criteria.

6.9 This comprehensive assessment undertaken by EDP further supports the release of site WHE 2 from the Green Belt.

7.0 Changes Sought to the Wheatley Neighbourhood Plan

7.1 In view of the analysis set out above Taylor Wimpey seek the following revisions to the WNP :

- 1 **Policy H1: Proposal for Housing** - the identification of site WHE 2 within policy H1 as a potential site for residential use with a mix of private and affordable housing tenures on a site totalling 3.43 ha. The corresponding release of the site from the Green Belt would need to be undertaken in conjunction with SODC through the progression of the SODC Local Plan 2033 but the latest draft version of this makes clear that the SODC Local Plan process would support the outcome of the WNP; and
- 2 **Policy H2 : Design Briefs** - whilst they support the principle of engagement with Wheatley Parish Council and other stakeholders, they consider that the process of a Design Brief, as set out within draft Policy H2 is unduly onerous and risks delaying the delivery of appropriate developments within the town.