

Planning services

**HEAD OF SERVICE: ADRIAN DUFFIELD**



Listening Learning Leading

**Contact officer: Robyn Tobutt**

Robyn.Tobutt@southandvale.gov.uk

Tel: 01235 422600

19 June 2019

**Wheatley Neighbourhood Plan – Comments under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (As Amended)**

Thank you for giving the Council the opportunity to offer formal comments on your draft neighbourhood plan. We would like to take this opportunity to compliment you on the preparation of a very thoughtful and well produced plan.

Having seen a complete draft, along with the Appendices, we are able to offer further advice 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 description 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.

Yours Sincerely

*Robyn Tobutt*

Robyn Tobutt  
**Planning Policy Officer (Neighbourhood)**

Ref.	Policy/Section	Comments
1	GENERAL	<p>Please make sure you source all the maps.</p> <p>Please refer to the emerging local plan as '<i>emerging South Oxfordshire Local Plan 2034</i>'.</p>
2	Page 6 – Paragraph 2.2	You have said 'including three Wheatley Parish Councillors (one of them a District Councillor)'. Is this statement still correct?
3	Page 8 – Paragraph 4.1	You say 'With Holton...', are you talking about the parish boundaries in this section? Or the neighbourhood area? It would be helpful to make it clear if you are referring to areas within the designated boundary (which the plan can influence) or outside the boundary (which the plan cannot influence).
4	Page 9 – Paragraph 4.6	You say, 'WNP research together with recent completions show that, despite the constraints of the Green Belt, at least 431 homes (24.3% of the current total of 1771) have been built in Wheatley since about 1980...'. We suggest you refer to a date when talking about the 'recent completions', as this is likely to change as the plan progresses and once it has been through examination/referendum.
5	Page 10 – Paragraph 4.8	<p>In this paragraph you say that the SODC Core Strategy requires that 40% of housing in all new sites with more than 11 dwellings should be affordable. This does not accurately reflect the Core Strategy policy. To better align with our position, we suggest you say:</p> <p><i>'The District council requires affordable housing contributions where there is a net gain of 10 or more dwellings, in line with national policy and guidance.'</i></p>
6	Page 10 – Paragraph 4.11	In this paragraph you talk about pupil numbers at Wheatley Park. It might be better if the issue is talked about more generally, not referring directly to pupil numbers. The neighbourhood plan does not take this issue forward or propose anything as a result of the pupil numbers, therefore its removal won't alter the aims and objectives of the plan.
7	Page 11 – Paragraph 4.12	In a few places throughout the document you refer to 'Wheatley and Holton', it would be useful if you made it clear if you are referring to the neighbourhood plan area, or parish council areas, as these are different. The neighbourhood plan should only relate to the neighbourhood area.
8	Page 11 – Figure 4.2	<p>This box includes extracts from previous versions of the emerging Local Plan (the Local Plan Preferred Option 2032).</p> <p>We recommend that you only refer to the most up to date version of the emerging Local Plan.</p> <p>This figure is titled '<i>Extracts from emerging SODC Local Plan Preferred Options 2032 [5] and SODC Local Plan 2011-2034 Final Publication 2<sup>nd</sup> [10]</i>'. However, the Local Plan Preferred</p>

		Options 2032 should not be referred to as the emerging document, as this is an earlier iteration of the document.
9	Page 11 – Paragraph 4.14	It seems like the beginning of this sentence is missing.
10	Page 12 – Paragraph 4.15	In this paragraph you say of particular relevance is the ‘emerging SODC Local Plan 2032 Preferred Option and the SODC Local Plan 2011-2034 Final publication 2 <sup>nd</sup> ’. We recommend that you only refer to the most recent and up to date version of the emerging Local Plan, which is the emerging Local Plan 2034 Final Publication Version 2 <sup>nd</sup> .
11	Page 13 – Paragraph 4.21	Suggest replacing ‘when it is eventually sold’ with ‘when the site is no longer used for educational purposes’.
12	Page 14 – Figure 4.3	Should this immediately follow paragraph 4.23?
13	Page 14 – Paragraph 4.24 and 4.27	<p>Paragraph 4.24 could be better placed. Currently it is located within a section of the plan and between two paragraphs 4.23 and 4.25 that are talking about traffic and parking. As a result, the idea of a ‘green route’ gets lost in the general discussion about traffic and parking. Whilst we appreciate that it falls under the general transport and movement heading, given its importance to other aspects of the plan, we suggest it is pulled out in a dedicated section.</p> <p>Paragraph 4.27 then talks about footpaths again and whilst the link has been made between traffic problems and pavements in the village, it could be better portrayed. It might be better if paragraphs 4.24 and 4.27 are together, instead of being split by paragraphs concerning traffic and parking.</p>
14	Page 15 – Figure 4.4	Map quality need improving
15	Page 16 – Paragraph 4.27	In this paragraph you say, ‘the WNP Committee can only address housing needs’, this is not true. The neighbourhood plan can address a number of other issues including, employment, leisure, and the environment.
16	Page 16 – Paragraph 4.30	Instead of just saying, ‘these are worse than the objectives set out in the government’s Air Quality Strategy’, to provide some context it might be helpful to include the government’s objectives. Then it will be easier to make a comparison between the Wheatley results and the government’s strategy.
17	Page 17 – Paragraph 4.32	Are you referring to the government’s air quality strategy in this paragraph? If so, make this clear.
18	Page 19 – Paragraph 4.34	<p>In this paragraph you say, ‘<i>Wheatley lies next to Shotover Country Park and totally within the Green Belt.</i>’. The settlement of Wheatley is inset from the Green Belt, therefore it is not ‘totally’ within the Green Belt. It would be more accurate to say:</p> <p><i>‘Wheatley village is tightly surrounded by the Green Belt and lies next to the Shotover Country Park.’</i></p>
19	Page 21 – Paragraph 5.2	In this paragraph you say, ‘ <i>the community is generally car owning with 50% of households having two or more vehicles</i> ’. Is this percentage from the survey? If so, you should state 50% of respondents to the survey?

		Have you considered looking at the 2011 Census data, it might provide a helpful comparison. Although please keep in mind that the results from your survey are more recent than the 2011 Census.
20	Page 22 – Paragraph 5.3	In this paragraph you say, <i>'The conclusion is that it is necessary...'</i> , it might be more accurate if you say, <i>'The conclusion of the survey is that it is necessary...'</i> .
21	Page 22 – Figure 5.2	Formatting - The key seems to have been cut off.
22	Page 23 – Objective HL101	Delete 'new' from 'the new South Oxfordshire Design Guide' as it was published in 2016.
23	Page 24 – Vision HL2V	The sentence <i>'The Green belt will be retained where it contributes to the environment'</i> , however, the Green Belt is a policy designation, not an environmental designation. We suggest it is rephrased as follows:  <i>'The Green Belt will be retained where it contributes to the purposes of the Green Belt. Areas of historic heritage will be preserved'</i> .
24	Page 24 – Vision HL4V	Replace <i>'buildings'</i> with <i>'businesses'</i> , as it won't be the buildings that is relocated, but the businesses.  This vision discusses relocating existing businesses to 'either the OBU site/or the eastern perimeter of the village', however there is no provision for employment land on the strategic OBU allocation in the emerging Local Plan 2034. References to moving businesses to the OBU site should be removed.
25	Page 24 – Objective HL403	This objective is concerned with promoting a mixed development on the OBU site, however this is a strategic allocation and no provision has been made for a mixed-use development. References to a mixed use development on the OBU strategic allocation should be removed.
26	Page 25 – Objective HL60	Delete 'new' from <i>'the new South Oxfordshire Design Guide'</i> . This guidance was published in 2016 and therefore is not new.
27	Page 26 – Vision IC2V	In this vision you say, <i>'...and at the OBU site, with some flexibility for future expansion'</i> . However, there is no provision for employment land on the strategic OBU allocation in the emerging Local Plan 2034. References to moving businesses to the OBU site should be removed.
28	Page 28 – Objective EO102	This objective is focused on encouraging businesses onto the OBU site to offset the loss of local employment due to the relocation of the university, however no provision has been made for commercial premises on the OBU site. References to moving businesses to the OBU site should be removed.
29	Page 30 – Paragraph 8.4	Delete 'new' from 'the new South Oxfordshire Design Guide'.
30	Page 30 – Policy H1: Design and Character Principles	Formatting – The end of the policy appears cut off.
31	Page 31 - Policy H2: Landscape Character	As in our previous comments, when discussing 'key visual landscapes' do not use 'e.g.'. You should clearly identify the key visual landscapes, using e.g. implies these are just examples.

		<p>Whilst we appreciate you have added that ‘each of these landscapes is illustrated throughout the text’, this does not provide the clarity required by national policy.</p> <p>The NPPG sets out that policies in neighbourhood plans should be ‘clear and unambiguous’.</p> <p>We would be happy to discuss this policy further, the risk is that if the policy is not sufficiently clear the Examiner might delete it.</p> <p>Using a map would be a good way to identify these key visual landscapes.</p> <p>It is not necessary to say ‘or the conservation area’, as conservation areas are regarded as heritage assets.</p>
32	Page 31 – Paragraph 8.8	<p>This paragraph jumps straight into talking about housing need, following the landscape character policy. It would be useful if there was a sub-heading introducing the new topic (rationale and justification) at this point.</p> <p>Before setting out the purposes of the Green Belt in this paragraph it might be helpful to provide a sentence setting out the context of the relationship with Wheatley village and the Green Belt.</p>
33	Page 33 – Paragraph 8.9	<p>Modify the first sentence as follows: ‘The <b>Green Belt</b> boundary at Wheatley is drawn tightly around the built edge of the <b>village</b>’.</p>
34	Page 34 – Policy P1: Parking Provision	<p>Make it a criteria list, after each point add ‘;’ and on the penultimate point add <b>‘; and’</b>.</p> <p>Please consider whether this policy and the paragraph before it (8.10) would be better placed in the transport and movement section of the plan.</p>
35	Page 35 – Paragraph 8.13	<p>It would be useful to provide more context on the list of factors listed in paragraph 8.13. This is part of supporting text of the plan and not a policy, but it should be more clearly set out that these are aspirations.</p> <p>Has OCC agreed to collaborate on these matters?</p>
36	Page 36 – Policy SCI1: Community Assets	<p>Insert <b>‘described in paragraph 8.14, or of any other established community use’</b>, to link the policy to the community facilities listed.</p>
37	Page 36 – Policy SCI2: Improvement to Community Assets	<p>We suggest you delete ‘<i>the value of</i>’ in the policy.</p> <p>The criteria for supporting the improvements to community assets does not align with the development plan policy (Policy CF2 in the Local Plan 2011) which outlines that:</p> <p><i>‘Proposals that would result in the provision of additional community facilities or services within settlements will be</i></p>

		<p><i>permitted, provided that there are no overriding amenity, environmental or traffic objections to the proposals and that there is no conflict with the other policies in this plan.'</i></p> <p>We suggest you amend the wording of the policy to more closely align with the development plan policy.</p>
38	Page 37 – Paragraph 8.21	In this paragraph you comment on 'mixed use on the OBU site'. However, this is a strategic residential allocation and no provision is made for mixed-use development in the emerging Local Plan 2034 allocation. References to mixed-use development on the OBU site should be removed.
39	Page 37 – Policy E1: Supporting Wheatley's Economy	<p>Where the policy says, '<i>those proposals that improve the appearance of the village and/or mitigate its own traffic issues</i>', it suggests there is a choice between improving the appearance of the village or mitigating traffic issues. We suggest that the '/or' is deleted from the policy.</p> <p>You should link this policy to the village enhancement plan, with suggest you replace 'improve the appearance of the village' with '<i>contribute to the village enhancement plan and mitigates its own traffic issues</i>'.</p>
40	Page 38 – Paragraph 8.22	You talk about the important views and landscapes that are 'in the district'. The neighbourhood plan should only contain locally distinctive policies and be concerned with areas that are within the designated neighbourhood area.
41	Page 39 – Figure 8.6 Shotover Target Conservation Area	This image is very small, and the key is hard to read. We suggest this figure is made bigger.
42	Page 39 – Paragraph 8.26	<p>Please make it clear when you are referring to the area of the OBU site within your designated area. The neighbourhood area has no influence over the areas outside the designated neighbourhood area.</p> <p>You say, '<i>over the whole site 155 trees were noted</i>', please keep in mind that the neighbourhood plan can only have influence over areas within the designated area. It should be made clear when you are referring to areas not within the designated area.</p>
43	Page 40 – Policy DQS1	<p>Delete 'new' from 'new South Oxfordshire Design Guide'.</p> <p>Given the neighbourhood plan area contains areas of Green Belt and countryside, there might be circumstances where it is not appropriate to support a renewable energy project, if it is in a sensitive location. We therefore suggest you include '<i>and are appropriately located</i>', to the end of the policy.</p>
44	Page 41 – 9 Wheatley Neighbourhood Plan: Policy for Oxford Brookes Campus	We previously provided you with a chapter skeleton for this section which made clear that the policies contained in this section were aspirations. We still feel like this text is important to include and would advise that you add in the following text at the start of the chapter:

		<i>'The policy contained in this chapter is not an allocation for development, rather it aims to communicate the aspirations of the Wheatley neighbourhood plan group in consultation with local people in Wheatley. The policy complements the vision, objectives and policies of the plan.'</i>
45	Page 41 – Paragraph 9.3	In this paragraph you discuss the potential for mixed use and re-use of existing buildings on the OBU site. However, as we have said throughout these comments there is no provision for a mixed-use development on the strategic allocation at the OBU site. References to a mixed-use development on the OBU site should be removed. This paragraph is not consistent with the OBU allocation and we therefore suggest it is removed from the plan.
46	Page 42 – Paragraph 9.5	You talk about the 'whole OBU site', however the whole OBU site is not within the designated neighbourhood area.  You should be clear with what area is within the designated neighbourhood area, as your plan can only impact on areas within the designated area. It is not appropriate to refer to areas outside of the designated area, we therefore suggest that you focus solely on the area within the designated area.
47	Page 44 – Policy SPOBU – WHE25	In line with the skeleton chapter we provided, we suggest you replace in the final sentence, <i>'will be supported that adequately address the following points:-'</i> , with <i>'any redevelopment of the Oxford Brookes University site should maximise opportunities to deliver:'</i> .  Criteria a This criteria should be deleted as there is no provision for employment land on the strategic OBU allocation in the emerging Local Plan 2034.  Criteria h The neighbourhood plan can only contain policies which relate to the designated neighbourhood area. If the playing pitches are not within the designated area this criterion should be removed.  Criteria j Is the ancient monument within the designated neighbourhood area? The neighbourhood plan can only contain policies which relate to the designated neighbourhood area. The ancient monument is not within the neighbourhood area and therefore this criterion should be removed.  Criteria k You talk about 'important views', you should identify these views in the plan for clarity.  Criteria l

		You make direct reference to British Standards BS583712012, this standard could become out of date, we therefore suggest that you delete the direct reference to the standards and instead say, ' <i>the appropriate standards</i> '.
48	Page 45 – Paragraph 10.3	You focus on the delivery of 'affordable housing on a much shorter timescale', however we have concerns that this might not be deliverable and /or a strong enough reason on its own. There are many factors that can hold up the development of a site, including on the allocations within the Wheatley NDP.
49	Page 47 – Paragraph 10.12	Criteria d There is no identified need for employment land within the emerging Local Plan 2034. We therefore recommend that the focus is shifted to offsetting the loss of employment from the OBU site, as opposed to the contribution towards the provision of employment land.
50	Page 48 – Figure 10.3	This figure is too small. It needs to be made bigger so that it is easier to read.
51	Page 48 – Paragraph 11.1	Through this plan a lot of emphasis is placed on the fact that housing through the village enhancement will be delivered on a much shorter timescale. This is one factor to consider, however it may not be accurate and should not be the main focus.
52	Page 48 – Paragraph 11.2	We would expect the site selection process to be based on suitability, availability and achievability, not 'unrestricted nature'.
53	Page 48 – Paragraph 11.3	We are currently in the process of ascertaining the support, in terms of master planning, that South Oxfordshire District Council can offer.
54	Page 49 – Figures 11.1 and 11.2	The quality of these maps needs improving.  The drawing keys in these figures are not clear and the text is not readable.  Why has open space been labelled on figure 11.1?
55	Page 50 – Paragraph 11.4	We suggest the following sentence is rephrased, ' <i>The bungalows lie in a site designated as WHE16 (Figure 11.3) and located almost completely within the light industrial area.</i> '. We suggest wording as follows:  <i>'The bungalows are located within WHE16 (Figure 11.3) and are located almost completely within the light industrial area.'</i>
56	Page 50 – Policy SPES1	The plan needs to set out the context of what is going to happen with the existing dwellings on site and how they are going to integrate with the proposed dwellings. We are aware that the existing dwellings are isolated from the main settlement, but no explanation has been given as to how development on the site would work.  You have set out the level of development expected on site, the plan will need to explain the rationale behind the level of development on site. This can be set out in the supporting text. For example, it might have been worked out based on the size

		<p>of the site and density figures, this information needs to be included.</p> <p>Criteria e This criterion is overly restrictive, as views enjoyed by existing buildings cannot be protected in this way. We suggest it is reworded to align with the development plan policy (Policy D4) as follows:</p> <p><i>'Ensures that the development does not have adverse impacts on the amenities of neighbouring properties through loss of privacy, daylight or sunlight.'</i></p> <p>Criteria g It might be better if you allocate land for car parking as part of the allocation, as opposed to including a criterion which asks that parking is provided. Within the supporting text you should provide justification as to why it is necessary to provide parking as part of the allocation.</p>
57	Page 52 – Figure 11.4	<p>It has been labelled 'dwelling removed', you should provide context for this in the supporting text</p> <p>Is village green label relating to an existing village green or a proposed village green? Clearer labelling of the figures would also help.</p>
58	Page 52 – Policy SPE2	<p>You have set out the level of development expected on site, the plan will need to explain the rationale behind the level of development on site. This can be set out in the supporting text. For example, it might have been worked out based on the size of the site and density figures, this information needs to be included.</p> <p>Criteria d and e Have these criteria which concern highways been supported by evidence or had any input from the highways authority? In their current form they might restrict future development on site.</p> <p>Criteria h This criterion is not clear and does not afford the neighbouring SSSI the protection required. We therefore suggest it is reworded as follows:</p> <p><i>'There will be no adverse effects on the neighbouring SSSI.'</i></p>
59	Page 53 – Figure 11.5	<p>The site should be clearly outlined. It is not clear where the site finishes and where the industrial areas start.</p>
60	Page 54 – Policy SPES3	<p>You have set out the level of development expected on site, the plan will need to explain the rationale behind the level of development on site. This can be set out in the supporting text. For example, it might have been worked out based on the size</p>

		<p>of the site and density figures, this information needs to be included.</p> <p>Criteria d Instead of 'nature corridor', we suggest you use 'wildlife corridor', in line policy C6 from the Local Plan 2011. The policy needs to have regard to South Oxfordshire's other development plan policies, including Policy C6 which sets out that '<i>In considering proposals for development, the maintenance and enhance of the biodiversity resource of the district will be sought</i>'.</p> <p>Why has the 'at least 20m wide' distance been considered appropriate in this case? What evidence is this based on? Has any survey work been undertaken to ascertain whether this distance is appropriate for the existing wildlife on site? The criteria also starts discussing a nature corridor but justifies that this is to maintain a gap between the rear gardens of The Avenue, maintaining a gap for amenity purposes is different from a gap for wildlife purposes, the criteria should be clear on its purpose. This is a significant buffer and without justification for the necessity of it, it is at risk of being removed or reduced.</p> <p>Buffers have been successfully implemented in South Oxfordshire, the Cholsey neighbourhood plan implemented a buffer in their allocation CNP H1a, they included the following criteria:</p> <ul style="list-style-type: none"><li>- '<i>Substantial buffer planting and green infrastructure around the northern, eastern and south western boundaries of the site including a green corridor between the houses along the Wallingford Road and the new development and an area of community woodlands as shown on the masterplan</i></li><li>- '<i>New fencing and at least 5m of buffer planting between all homes in Rothwells Close and the new development</i>'</li></ul> <p>Please note that the 5m buffer was offered by the developer, as set out in the supporting text to the policy.</p> <p>Criteria e This criterion could potentially be in conflict with Policy H3 from the neighbourhood plan which addresses housing mix and size. We suggest you remain consistent with your approach to housing mix and refer to policy H3.</p> <p>Criteria f Replace 'allocated' with 'provided'. By saying allocated, you are referring to an allocation within an allocation.</p>
--	--	--

		<p>Would the games area be part of the recreational space? We suggest you expand the supporting text to provide rationale behind asking for this as part of the policy. The NPPG sets out that the neighbourhood plan policies should be <i>'concise, precise and supported by appropriate evidence'</i>.</p> <p>Criteria h Has this criteria been supported by evidence or had any input from the highways authority? In its current form it might restrict future development on site.</p>
61	Page 55 – Policy SPES4	<p>We suggest you replace <i>'would'</i> with <b>'will'</b>.</p> <p>Criteria a You need to remove the reference to 'A.W.Mobbs' in the policy. It should read as follows:  <b><i>'It supports the delivery of the village engagement plan by accommodating the relocation of businesses moving from the Littleworth site.'</i></b></p> <p>Criteria b You say 'for any other businesses', however some businesses might not be appropriate in this location. You can have retail businesses and commercial businesses, both of which operate differently. We suggest you replace this with:  <b><i>'for any other appropriate commercial businesses, subject to site constraints.'</i></b></p> <p>Criteria c If this is a solely commercial area, is it appropriate to have public open space? Is it likely that the public will utilise this space?</p> <p>Criteria d It might not be possible for all development to 'enhance' the landscape and scenic beauty of the surrounding environment, we therefore suggest you insert, <b><i>'where appropriate'</i></b>.</p> <p>Criteria e It is also important that this new commercial area integrates well with the existing area, we suggest you add, <b><i>'and well-integrated'</i></b>.</p> <p>We suggest that an additional criterion is added to this policy to ensure that development does not result in acceptable impact. We would suggest that you use similar wording to that in the emerging Local Plan 2034, in policy ENV12:</p>

		<i>'Development proposals should be located in sustainable locations and should be designed to ensure that they will not result in significant adverse impacts on human health, the natural environment and/or the amenity of neighbouring uses.'</i>
62	Page 55 – Paragraph 11.12	<p>We support the focus of the Wheatley NDP to improve accessibility through the village, the NPPF sets out in paragraph 98 that:</p> <p><i>'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.'</i> (para 98)</p> <p>Directly referring to this paragraph from the NPPF in the supporting text will help to reinforce the importance of it.</p>
63	Page 55 – Policy SPGR	<p>We support the principle of this policy, however as currently worded it does not achieve what we think you want it to achieve. We therefore suggest the following wording:</p> <p><b>Proposals for creation of a Green Route through Wheatley, as identified in Figures 11.1 and 11.2 will be supported.</b></p> <p><b>Any development which will have an adverse impact on, or will benefit from the proposed Green Route will be expected to contribute towards its provision, subject to need and viability.</b></p>
64	Page 57 – Brownfield Site	We suggest that you use the exact definition from the NPPF, currently you have omitted, <i>'(although it should not be assumed that the whole of the curtilage should be developed)'</i> .

## Appendix 2: Site Assessment

Ref.	Section	Comments
	General	Update to take into account the Housing Needs Assessment.
1	Page 2 – Paragraph 1.3	<p>Criteria d</p> <p>There is no identified need for employment land within the emerging Local Plan 2034. We therefore recommend that the focus is shifted to offsetting the loss of employment from the OBU site, as opposed to the contribution towards the provision of employment land.</p> <p>Last paragraph You need to ensure that you link your site assessment with the findings of your housing needs assessment to ensure that it is robustly evidenced.</p>

2	Page 4 – Paragraph 2.1	‘aim to meet the bespoke needs of the neighbourhood area’. – Link this with the finding of your housing needs assessment to ensure that it is robustly evidenced.
3	Page 5 – Figure 2.1	How is encouraging mixed use on the OBU site a key objective that will be delivered through detailed amendments to the Green Belt boundary? We don’t think there is a link here and would recommend that this objective point is removed. In addition, we have made clear that in the emerging Local Plan 2034 there is no provision for a mixed-use development.
4	Page 7 – Figure 2.3	The quality of this image needs improving.
5	Page 9 – Figure 2.4	For consistency it might be better if for ‘availability’ you also use pass and fail.
6	Page 10 – Paragraph 2.13	<p>You start this paragraph by saying, ‘<i>The brownfield part of the WHE25 site (OBU) is approximately 12.1 1ha and if all the WNP aspirations are to be fulfilled will need to support mixed use, including all types of housing, allow commercial relocation/use and make provision for burial land and leisure/playing fields</i>’.</p> <p>However, as we have set out in the neighbourhood plan comments, there is no provision for a mixed use development on the OBU site. It is not the site assessment’s role to go into this level of detail on your aspirations for a site which is not being considered further through the site assessment. We would suggest that this text is removed, and the focus remains on the facts, e.g. the site is not being considered further due to it being a strategic allocation in the emerging Local Plan.</p>
7	Page 11 – Paragraph 2.14	<p>What does, ‘<i>From the selection process six sites*...</i>’, relate to?</p> <p>We suggest you keep the focus local, even when discussing employment. Instead of ‘<i>to provide opportunities for employment</i>’, we suggest, ‘<i>to provide opportunities for local employment</i>’.</p>
8	Page 11 – Paragraph 2.15	In this paragraph you should refer to your plan visions and objectives.
9	Page 12-23 – Detailed Assessments	We suggest you use the boxes under the evaluation to explain the scoring. Especially when each topic contains multiple questions. For example, the first site WHE2, why has the assessment of the size of the site resulted in it being amber? Is it too big? Too small? Do site constraints limit the developable land?
10	Page 23 – Paragraph 2.17	In the sentence, ‘ <i>This opportunity will enhance the village in the by providing affordable homes together with...</i> ’, delete ‘in the’.
11	Page 25 – Paragraph 2.21	You say, ‘ <i>if a decision has to made between siting new homes next to a busy dual carriageway (e.g. WHE2) or next to part of the Green Belt (e.g. WHE15) than the latter has big advantages</i> ’. This text is very informal and instead of discussing the advantages you should focus on the planning constraints, e.g. noise, pollution, flooding, etc.
12	Page 26 – Paragraph 2.24	In this paragraph you refer to very special circumstances when considering development in the Green Belt. This is not

		incorrect, however, when dealing with plan making (the neighbourhood plan), the test for releasing from the Green Belt is exceptional circumstances. Very special circumstances are required when a development is proposed in the Green Belt through an application. You need to be clear that you are proposing land is release from the Green Belt through the plan making process, whereby exceptional circumstances are required. We suggest you amend this paragraph accordingly.
13	Page 27 - Glossary	You have a glossary on the main neighbourhood plan document, given that this is an appendix of the plan, is this necessary? Does it include anything that the main neighbourhood plan document doesn't?

## Strategic Environmental Assessment

Ref.	Section	Comments
1	Page 1 – Para 1.1.3	Replace 'South Oxfordshire Plan' with 'South Oxfordshire Local Plan'.
2	Page 2 – Para 2.2.2	This paragraph incorrectly refers to the emerging Local Plan timeline.
3	Page 3 – Para 2.2.7	<i>'The implication of Policy STRAt14 (which can be assumed to have some weight, now that the Local Plan has been submitted, albeit it is yet to be subject to examination)'</i>
4	Page 13 – Section 7 – Developing the Preferred Approach	This is duplicating page 12.
5	Page 17 – Para 10.2.7	In this paragraph it states that mixed-use development is expected as a result of the OBU site. There is no provision for mixed-use development on the OBU site through the strategic policy in the emerging Local Plan.
6	Page 18 – Para 10.3.7	This paragraph makes reference to the whole OBU site, however the whole OBU is not within the designated area.
7	Page 19 – Para 10.5.1	In this paragraph it states that the neighbourhood plan area is entirely within the Green Belt, this is incorrect as the built-up area of Wheatley is inset from the Green Belt.
8	Page 20 – Para 10.5.6	It is likely that the neighbourhood plan policy relating to the OBU site is going to change due to the policy trying to have influence over factors which are not within the designated area.
9	Page 23 – Para 10.7.12	There is no provision for mixed-use development on the OBU site through the strategic policy in the emerging Local Plan.
10	Page 27 – Para 11.1.2	It states <i>'The Council took careful account of the merits of alternatives...'</i> . Please be clear when you are referring to the Parish and District Councils. We also note that the designated area comprises areas from two parishes, Wheatley and Holton.
11	Page 27 – Para 11.1.3	It states <i>'no strategic allocations are proposed by the Local Plan on the eastern edge of Oxford, i.e. in the vicinity of Wheatley, hence the potential for cumulative effects is considered limited'</i> . However, the OBU site is a strategic allocation in the emerging Local Plan, policy STRAT14.

## Environmental Report Non-Technical Summary

Ref.	Section	Comments
1	Page 3 – Establishing reasonable alternatives	When it states ‘ <i>the Oxford Brookes Wheatley Campus site will be allocated by the South Oxfordshire Local Plan...</i> ’. Please insert ‘ <b>emerging</b> ’, as it needs to be made clear when you are referring to the emerging Local Plan.