

**Wheatley Neighbourhood Plan Review**  
**Community Responses\* to Pre-Submission Consultation**  
**June – July 2022**

[\*Communities served by Wheatley and Holton Parish Councils are parties to the Wheatley Neighbourhood Plan.]

Twelve written responses to this seven-week Consultation came from residents in the WNP Area [including one from a couple, and two from one correspondent = 10 people]. Two Interest Organisations [Wheatley Windmill Preservation Society and Wheatley Scouts Association] responded. Advisors to a Development Company (Lichfields to Taylor Wimpey) proposing 80 homes on the Waterperry Rd junction with Old London Rd also responded. Core resident responses ranged from 'Opposition' [1] through 'Support with Concerns' [11] to 'Support without Comment' [2]

Well-aired Wheatley concerns over Traffic and Infrastructure were raised. (WNP is limited by law in commenting on the proposed size of development for its Strategic Site (the OBU Campus). It is also limited in raising everyday Traffic / Infrastructure concerns in its own NP Area. 'Land Use' is the key WNP Brief until it is finally 'Made' by Referendum.

Several respondents asked about safeguards/limits to the agreed new Green Belt policy. It is clearly shown in SODC Local Plan 2035 – the key confirming text. It comes under Green Belt Policy STRAT6, Para 3. Detailed amendments to the Green Belt made by Wheatley NDP [for Ms Tombs' Field and The Bungalows Community] which must comply with the requirements of the NPPF and the need for the change shown in LP 2035.

In December 2020 Wheatley Green Belt Policy was adopted by SODC Local Plan 2035 in a Government / SODC agreement on Green Belt Policy in part of eastern Wheatley. The conditions are that it must be in compliance with the requirements of the NPPF [?latest version, July 2021] and to meet the need confirmed in LP2035 for affordable housing. Oxfordshire CC in an exceptional 'infrastructure' meeting requested by WNP Committee (January 2018) pressed for a Green Way [cycle and pedestrian, Littleworth to ASDA return] to cross Ms Tombs' Field as a legally safeguarded route (long advocated by Wheatley P.C. Approximately 55 affordable homes were proposed after a professional community needs survey was conducted by WNP in 2016). These must meet Design Codes proposed by WNP and laid down by SODC since 2021. Finally, a new Environmental Act [2021] has Royal Assent and takes effect in 2023. The small nature reserve proposed for Ms Tombs' Field by WNP since 2016/17, should 'have its day' hopefully under modern terms.

WNP Committee thanks Respondents for helping make this Neighbourhood Plan, a community task. Beginning late in 2015, it has been an unexpectedly long stint.

Cheerful, willing volunteers at doorsteps, in street teams, and in supporting formal and informal meetings have kept us going. The WNP Committee (21 +) , represents our NP Area and its community age range, bringing relevant skills, and knowledge. The NP Committee worked as a team with immense good humour. The vice-Chairman summed it up, *'I'm glad we were here!'*. I have abbreviated Consultation Responses below. Individuals remain anonymous, and WNP protects all personalised documents 2015 to date as the law requires: they will then be destroyed.

**John Fox, WNP Chairman**

## **Responses to Consultation**

### **Response 1.**

I have concerns over *Key Issue No 5 [A4 Insert Prompt & Summary Sheet, Wheatley Newsletter, June/July 2022]* It reads “Should Green Belt be released? If the Local Plan [LP] sets strategic policies and identifies the circumstances, then a Neighbourhood Plan [NP] can amend the Green Belt boundaries where the changes are evidenced and justified.”

“I am concerned about the generalist tone to the village's general Green Belt. What protects Wheatley from overbuilding and losing its strong identity? There are multiple small patches of greenbelt here helping trees animals and eco-systems. What greedy people selling off paddocks?”

**WNP Reply:** Wheatley Parish / WNP cannot simply take away Green Belt status and allow building on any land. It must be removed from the GB in the Local Plan – LP 2035 is the latest. WNP's first action in 2016-17 was to find where village improvement/enhancement was needed. In the east of the village, Green Belt extends to the Thame. SOLO /ASDA have always been in the GB along with all the commerce and industry. They didn't expand into it, but they expanded westwards on GB land. (Ms Tombs' Field). The same growing industrial estate saw new stores open and grow, culminating in today's ASDA. The Bungalows Community became hemmed in, without recognised approach or setting. WNP asked SODC for MTF and TBC to be released from Green Belt. The Examiner who inspected WNP's Enhancement proposals, praised them for their positive approach. SODC councillors echoed the same in Nov. 2017 – 'refreshingly positive for a change'. A professional survey of the need for affordable homes was secured by WNP from Community First Oxfordshire (Autumn 2016) which reported a significant need for these. Attention also turned to central Littleworth where a brownfield site needed Enhancement, but its boundary with GB land, unlike that of the Eastern Wheatley industrial area, required no change or release from GB. The WNP Examiner in 2018 also noted that WNP had done its best 'in good faith' with outdated District legislation and in the middle of disagreement between Local and Central government over the state of the Local Plan. His advice that we go the long way round – ditch all but one of

our Enhancements, then put a stripped down WNP to Referendum, have it 'Made', then 'Review' it (as is happening now, 2022). This has turned out to be the wisest planning decision the WNP Committee has witnessed. (The OBU Strategic Site proposal grew alongside us rapidly after that, 'approx'. 300-500 homes. In law we were allowed less say over that technically because it was 'Strategic' – too big for us!)

## Response 2.

“Any standard form to be completed for Response?”

**WNP Reply:** No, we thought a letter or note might give people room to think 'sideways', and to add and alter. And change minds!

[J.F.]

“No policies for traffic/pedestrian infrastructure. These will come later, but this seems somewhat the wrong way round. Traffic will be a key consideration and have significant impact. Wheatley is already frequently grid-locked during rush hours and several hundred more houses in the vicinity is unlikely to improve this situation ... how many houses and cars (x 2) can be supported by the existing network?”

“The OBU site would need shop, school, bus links and communal ground. What is the proposal to change the Littleworth industrial estate into ? Again with roadside parking, traffic through Littleworth is already challenging.”

**WNP Reply:** WNP presents Policies which create a framework within which planning proposals must fit. At the Outline or Detailed Planning stages there is ample opportunity for scrutiny by anyone to address the issues like traffic and amenities and to influence when the provision is made in the development timetable. The OBU site has outline Planning consent for 500 houses. When a developer comes forward with detailed proposals, you will be able through the Planning System to apply pressure to ensure that the proposals include shops, services, bus links and open space. Despite the limits to Neighbourhood Plan powers, 'close knowledge' of community and context (and the opportunities to express these) are important strengths for an NP Committee. Naturally Wheatley and Holton are concerned about extra traffic being created by the proposed OBU community, its impact on the Wheatley/Holton roads the village exits/entries/links to the A40 and M40 so near, together with the Noise and Pollution health hazards.

The OBU site has had Outline Planning Permission for development based on 500 homes for about 3 years. On 17 June 2022, the land there put up for sale. This is the actual Detail Planning stage where developer good-will will be tested and where timely pressure may be applied by public and District/County opinion for the detail of shops and services, school, bus link, communal parkland and traffic infrastructure.

On land-use having priority before traffic infrastructure: WNP sought interview with OCC Highways in January 2018. A WNP member chaired the meeting and provided an Agenda. We had cited OCC archive material (2011-12) and gnawing local concern about the impact of the M40 and A40 (rush hours and rat runs) on adjacent villages. (In 2018 We were able to add 'No improvement'.) Noise from the A40 across the village is also being seen as a health issue, no longer merely a 'Nuisance'. This has been highlighted by the residents of Mill Green/View. Obviously, if OCC created open-door admission to communities / WNPs wanting to talk traffic, they would risk having to increase budgets, staff and priorities.

OCC emphasised in 2018 that they would support the village Green Way 100%. They allowed us another session, but only *via* written questions / answers. We took this offer up. We declined an offer of fee-paying consultation as hard to justify to taxpayers. After WNP was 'Made' in 2021, we were invited to deliver a WNP 'report' to WPC on Wheatley traffic issues – blind spot junctions, crossings petitioned [2016] by Primary parents traversing the linear village twice a day, and narrow Station Rd pavements sunken flush to the road. Councillors shared their traffic insights and listened to WNP insights. Most pressing was the new, wider role given to Holloway and Park Hill after so many centuries. (It was Vicarage Hill, in Victorian times. It is as steep as Ladder Hill, crosses three linear roads (without road crossings), lacks considerable pavement, is narrow and ill-laid. It is questionably narrow for a two-lane bus-service sharing with all other traffic. The other key traffic concern is rising congestion on the A40 Bridge adjoining Park Hill. WNP has much understanding, but our WNP powers alone are limited.

### **Response 3.**

[Second Response from Respondent 1.]

“More detail please, on Green Belt circumstances. What are the safety/special criteria for the wealth of culture/wild-life in Wheatley. Badgers and bats here are protected. Environmentally, how will we protect animals. Not the WNP Area – if all greenbelt were released Wheatley would increase x 2 or 3 times.”

WNP Reply: Thank you for the additional comment. Please note 'Green Belt' is the technical legal term since the 1860s industrial development period. It was designed to stop industry and industrial worker mass housing from creeping into rural villages and farmland: as a protective 'Belt'. Green Belt prevents adjacent settlements/communities joining together to form endless suburbia and provides a green lung for health and well-being. It is clearly beneficial for nature and wildlife as well, as long as it has sympathetic stewardship. Green Belt legislation also provides for *removing* GB status when GB no longer fulfils its GB function. SODC and the Inspectorate agreed that the specific area of the Green Belt at the east end of Wheatley, failed to function as a Green Belt. (The line around the released area had

to be clearly defined by existing features.) It is therefore relatively simple in shape. The GB boundary, where the eastern industrial estate borders MTF, is so fragmented, it requires a clear-line policy to release it from GB, not a set of individual decision points along a fragmented boundary. SODC pronounced this 'Wheatley Policy STRAT6: Green Belt, Para 3, in its Local Plan, LP2035, 10 December 2020, just 10 months after the Examiner had made his judgement. We await a new Environmental Bill due early in 2023, with some fresh thinking and language.

**Response 4** (Wheatley Scout Group).

“Objective SI 104 states 'Consider identifying land to relocate the current accommodation used by the Scout Movement, to improve safety and encourage increased participation in the organisation.' What weight does this hold in The WNP and does it indicate practical or financial support?”

**WNP Reply:** The WNP is a Statement of proposed Policies for community planning. Objective SI 104 is clearly a positive policy, but yet to be 'Made' by community Referendum. Practicalities of site, safety, and finance can be discussed any time, as you are now doing. Thank you for the support. (We agree also that commercial traffic should enter Wheatley from the East). Once NP is 'Made', open community discussion would then help Policy decisions to be properly implemented.

**Response 5** (Couple, shared letter.)

“Delighted with current content and standing of WNP, particularly with aspects concerning Littleworth, plus your continued engagement with transport and infrastructure consequences of developing the OBU site. The arrival of the number 46 bus service suggests an enhanced future for the village.”

**WNP Reply:** Thank you for your positive Responses. We could not have got this far without the encouragement and active support from so many in the community.

**Response 6:** (a long-term view of Village Planning – by a veteran)

“Thank you to everyone who has volunteered time and expertise, hidden and open. This Plan reflects advances in thought about the built environment over the last 40 years to Wheatley's advantage. Pedestrians and cyclists are not ignored, nor is our landscape. The villages have to grow, as does the Brookes site, and a haphazard past needs correcting. I agree on the pieces of land being removed from Green Belt. Better to have the agreement of present inhabitants than be overtaken by a *tsunami* of speculative development which will not provide the smaller properties we need. I welcome the WPC / OCC Green Way, East-West, along Wheatley Valley. Another excellent idea is to connect the OBU brownfield site with Wheatley by a pedestrian

route. The 'New Holton' on the OBU site will impact Wheatley more than it will Holton. New custom for Wheatley shops and amenities needs careful management to avoiding overwhelming the village centre with parked cars.

I welcome the tree surveys on the OBU site, the possibility of saving some useful university buildings there, and the demolition of the disused, asbestos-contaminated tower. I welcome the attempt to shift commuter cars from Wheatley. A trick was missed by WNP in not mentioning the Special Scientific Interest Site below the Windmill. Could it be made part of the new Green Way? Or be an offshoot of the path - Windmill Lane to the corner Postbox in Littleworth? In time, after several five-year reviews, the WNP is likely to become a sort of mini-Domesday Book for Wheatley, Littleworth and the OBU site.”

**WNP Reply:** Thank you for that thoughtful response. Apparently, a new Environment Act becomes law in 2023 and it might be worth the Windmill Society's studying it for new ideas and legal protection.

### **Response 7.**

“I fully support the content of the first WNP Review, particularly the proposed reinstatement of sections deleted from the original Plan, notably the need to modify Green Belt to allow coordinated development of Policies 15, 16, 17 and 22.”

**WNP Reply:** Any changes to the Plan now and in future will need to take into account increasing new traffic affecting village life. Heavy vehicles already move East-West / West-East the length of London Rd to access the eastern industrial Area. They have accessed London Rd by the Park Hill flyover for half a century. The 280 through-route to Thame and Aylesbury crosses Park Hill from the Flyover to mid-Wheatley. A new Nursing Home on Park Hill (2023) will draw new traffic, while the century-old large housing already there needs its own access. An unusual two-way *slip road* leads across Park Hill both to the A40, and to-and-from Shotover Park and Shotover House. There are also multiple farms east of Wheatley that bring heavy agricultural machinery to the main roads. A new Wheatley Pharmacy [2022] at Morland House GP Surgery replaces that formerly in Wheatley High St, but car parking for this new Pharmacy could be improved. Wheatley Park Academy pupils are now having to negotiate a far busier Park Hill for bus transport, including that provided for older pupils throughout the school day flexitime. To help ease village heavy traffic, I believe that all industrial estate traffic should be made to come to the industrial area via the turn-off from the A40 heading towards Thame using a new roundabout where it joins the A418. There, such traffic could then turn right and enter the village for the industrial estate from the East.

### **Response 8.**

“Having learned that my fellow villagers have voted a resounding Yes to the WNP Referendum concerns me greatly. They don't care about losing the Green Belt

which has surrounded and protected us from over- development. The Green Belt has helped Wheatley as a rural community in the countryside. This summer's heatwaves show we need greater balance between human activity and our planet. 'Green' in the name 'Green Belt' is the colour of trees, fields and open country, a home not just for us, but for local wildlife which also has the right to live and a place to live it. The unkempt field earmarked for re-development [Ms Tombs' Field] has undergone a remarkable transformation as it has awaited its fate. Nature has been left to its own devices. All types of butterflies, some almost extinct here, have been observed. Rare orchids and small and large mammals are now living in the newly formed habitat. A slow-worm photographed there in mid-July 2022, is a rare, protected series of reptile. I have seen swifts swoop and feed from the insects which now emanate from shrubs and wildflowers in the newly formed ecosystem, a dwindling species once plentiful over Wheatley. All this wildlife will be lost forever when the bulldozers arrive. This is my response.”

**WNP Reply:** Thank you for the lively slow worm picture (2022). Note that great value has now been placed on GB. Approximately one-third of Ms Tombs’ Field (MTF) site will be natural: the green buffer zone behind Avenue back gardens will be a wild-life corridor, allowing privacy to those gardens; what we hope will be a sanctuary /habitat in the 'Enhanced' version of MTF will also be established. The field will accommodate part of the village Green Route, Littleworth – ASDA. The proposed new housing in MTF, still due for detailed planning, once the final Referendum goes through, will have vehicle access limited to / from London Rd only. Our Green Belt policy for MTF (and the Bungalow Community behind ASDA Petrol) protects both from further encroachment westward by industry and commerce. We wanted to Enhance parts of Wheatley which are in long overdue need of it. It was never a hidden WNP Plan to 'lose' /shrink Green Belt when we proposed Enhancement. Wheatley Green Belt Policy is clear, limited and strictly protected, as stated in the SODC Local Plan 2035, (Dec. 10, 2020) STRAT6, Para 3.

## **Response 9**

“My Thanks to the members of WNP Committee for their hard work over many years. I support their vision, objectives and policies drawn up in the WNP. My only comments are about WHE 22, Littleworth Industrial Area. In Fig 12.4, the grass area of Littleworth Green is indicated. Some 30 years ago, there was a larger area of grass concreted over by one of the owners of an industrial unit. It would be good to have a larger area of grass as 'Littleworth Green' included in the development of the site. The off-street car parking to be incorporated for residents needs only to relate to 5 or so car spaces, to reflect the actual parking by Littleworth residents, as most of the concrete area is used by the businesses or people from further away.”

**WNP Reply:** Thank you for these observations on Parking in Littleworth.

When Outline Planning comes to Detailed Planning, this is the sort of key detail we need to present to WPC and SODC Planning Committees.

**Response 10.** (Couple, two responses, 1 of 2)

“I write to confirm my support for the latest version of the WNP. It provides a framework for the future development of this unique village in a way which enhances Wheatley and Littleworth, with better air quality and healthier transport options.

**WNP Reply:** Thank you for your courtesy.

**Response 11.** (Couple, two responses, 2 of 2)

“To whom it may concern. I support the revised Wheatley Neighbourhood Plan totally”

**WNP Reply:** Thank you for your courtesy.

**Response 12** (Wheatley Windmill Preservation Society meeting, 16<sup>th</sup> June 2022.)

We appreciate the enormous work put into this WNP, not least in restoring it from the diluted version imposed after First Examination by county and district councillor affiliations. Removing one significant piece of land from Green Belt is a price worth paying to benefit other village areas. We appreciate that the Windmill in its paddock will remain firmly in Green Belt. Wheatley community will also have its say in its development. We approve of the Green Way. We approve of the line of terraced cottages in Littleworth instead of industrial units. We welcome warmly the suggestion that the scrap metal in Powell's yard be cleared away. It will be a precedent for removing scrap and debris immediately to the north of Windmill Paddock. We hope the concrete apron left near the rest of Littleworth Green can be treated sensitively, better designed as it probably serves fewer cars, while the rest will revert to being part of Littleworth Green again. Our one concern is that the track from Windmill Lane by Windmill Cottage down to the (Littleworth) Postbox on the corner should be formally be designated a Footpath. This Map Modification, [*init.* 2019] is now top of the OCC list for consideration. It could form a branch of the Parish/WNP/OCC Green Way and a new circular walk (traffic free) on the south side of the valley. Making this a Footpath links it to existing Footpaths on the other side of the main road, through to Keydale Rd and from there into Old Rd, emerging near the Postbox part way up the hill. We hope that car access to the terraced cottages proposed for the Littleworth brownfield site, will be sensitively managed to allow this end of the track/path from the Post Box and going up towards Windmill Lane to remain accessible to pedestrians.

**WNP Reply:** Thank you for your courtesy.

**Response 13** (reference to a representation from Lichfields (advisors to Taylor Wimpey).

Lichfields' comments were copied to the WNP Committee since they refer to a Wheatley Land Plot (WHE2). This plot borders northern edge Old London Rd, southern side A40, and eastern edge Waterperry Rd where it joins Old London Rd from the north. Although no details were provided Lichfields discusses an illustrative plan for 80 homes.

**WNP Reply:** We acknowledge this Representation. It should be noted that WNP with Examiner support (February 2020), SODC support (December 2020) and community support to date, pressed for a limited Wheatley Green Belt Release to unlock the *impasse* in the east of the village arising from previous bad planning. The current Oxfordshire Plan 2050 includes radical Green Belt release across all five Oxfordshire District boundaries and forecasts for housing needs. The WNP does not regard its achievement of a Wheatley Green Belt Policy [SODC Local Plan 2035] as a '*Vision for current and future housing need,*' (Lichfields, p.3/11), but rather as a key to unlocking Enhancement to offset the effects of poor post-War planning in parts of Wheatley. Space for some much-needed affordable housing was supported by Community First Oxfordshire findings in Autumn 2016. The WNP Committee sees no resemblance or link between the proposed WNP Enhancement programme and the aims of Oxfordshire Plan 2050 (It should be noted that this Plan is in jeopardy.\*)

Taylor Wimpey's advisers state that 'WNP should not simply default to [its] earlier submission version of only a modest allocation of homes'. Instead, Lichfields advise that WNP 'should undertake a fresh Green Belt assessment, otherwise any Green Belt boundary it creates will be superseded by the new Oxfordshire Plan 2050 in the near future. It is also stated that the WNP risks being particularly short-sighted in the light of the emerging policy context outlined here' (Lichfields p.4/11). These comments completely overlook the fact that the WNP has updated the sections on Site Selection, Housing Needs Assessment and Site Based Development Appraisal to take into account current planning policy and the forthcoming Environment Act.

(\* The Oxford Mail, 11 August 2022. The front-page headline reads; "Backlash over 2.5m greenbelt plan failure". Quotes from news article; "the end of work on Oxfordshire Plan 2050"; "serious disagreement, it is claimed, has set in over housing and growth targets")

I owe huge thanks to Simon Shew, retired professional architect and member of the WNP Committee since 2015, for spending two days in August adding his wisdom

and experience to my version of this paper – as he has done so often to discussions in open Committee too. Consultation respondents, of course, remain anonymous, but this Report / Discussion Paper also acts as my thanks to them.