

VALE OF WHITE HORSE
LOCAL PLAN 2031 - PART 1
PRE-SUBMISSION CONSULTATION DECEMBER 2014

Representations
on behalf of
Jewson Holdings Limited

Prepared by
Paul Slater BSc (Hons) MSc MRTPI



December 2014

CONTENTS

i	SUMMARY	2
1.0	INTRODUCTION – OBJECTION TO LOCAL PLAN CORE POLICY 2	3
2.0	VALE LOCAL PLAN - PROGRAMME AND TIMING OF CO-OPERATION	3
3.0	NEED FOR A STRATEGIC GREEN BELT REVIEW	4
4.0	GREEN BELT REVIEW PRINCIPLES – CONNECTIVITY TO OXFORD	6
5.0	GREEN BELT REVIEW PRINCIPLES –THE SETTING OF OXFORD	7
6.0	LAND AT FARMOOR – DEVELOPMENT POTENTIAL	8
7.0	LAND AT FARMOOR - ASSESSMENT AGAINST GREEN BELT REVIEW PRINCIPLES	10
8.0	OTHER LOCAL PLAN POLICY OBJECTIONS	12
	APPENDIX 1 SITE PLAN	
	APPENDIX 2 OXFORD CITY VIEW CONES	

SUMMARY

- i. These representations are submitted in response to the Vale of White Horse Local Plan 2031 Part 1 – Pre-submission consultation, December 2014 (LPP1). They are made on behalf of Jewson Holdings Limited (Jewson Holdings).
- ii. Jewson Holdings have land under their control south east of Farmoor between the B4044 and B4017 and within the Vale of White Horse District ('the Vale'). The land extends to approximately 9.5ha and is identified on the plan attached as **Appendix 1** to these representations. The land is available and suitable for residential development and can deliver around 250 dwellings.
- iii. Jewson Holdings support the proposed process of co-operation to address Oxford's house need, including a strategic Green Belt review which includes Land at Farmoor. Given that this process is underway and Oxford's unmet needs have now been identified, a strategic Green Belt Review should inform LPP1. Otherwise LPP1 will be out of date, even before it is adopted.
- iv. A strategic Green Belt review is clearly justified by the scale of Oxford's un-met housing needs, amounting to around 18,000 homes. The principles of such a review favour sites which are well connected to the city by sustainable modes and which do not affect the setting and green backdrop of the city's famous '*dreaming spires*'.
- v. Land at Farmoor has strategic advantages in this regard. It does not have a visual connection with Oxford and its development would not affect the historic setting of city. The land does, however, have good access and connectivity by sustainable modes to Oxford City, being on a high frequency bus route and within cycling distance. It has potential to contribute to the delivery of the strategic Eynsham to Botley cycleway and has good access to the A420 and A34. The land is subject to urban influences and can integrate with the existing village of Farmoor. Development would not constitute urban sprawl or lead to the coalescence of existing settlements. Land at Farmoor should be considered and identified for development through a strategic Green Belt review.
- vi. Without addressing Oxford's unmet housing needs and being informed by a strategic Green Belt Review, Jewson Holdings consider the LPP1 development strategy and particularly Core Policies 2, 3, 4 and 8 to be unsound – not positively prepared, not justified, not effective and not consistent with national policy.

1.0 INTRODUCTION – OBJECTION TO LOCAL PLAN CORE POLICY 2

- 1.1 Jewson Holdings support the intentions of Core Policy 2 to co-operate with adjoining authorities to address Oxford's unmet housing needs but object on the basis this co-operation and a strategic Green Belt review has not been undertaken to inform the Local Plan Part 1 (LPP1).
- 1.2 In Jewson Holdings' view a strategic Green Belt review is required at the current time to identify and allocated additional sites to meet Oxford's unmet house needs. Such an assessment should include Jewson Holdings' land at Farmoor. In the absence of such an assessment, LPP1 cannot be considered sound as it is not positively prepared, not justified, not effective and inconsistent with national policy as set out in the National Planning Policy Framework (NPPF).

2.0 VALE LOCAL PLAN - PROGRAMME AND TIMING OF CO-OPERATION

- 2.1 As is highlighted at paragraph 1.18 of the LPP1 document, co-operative working is being managed through the Oxfordshire Growth Board. Jewson Holdings support the intentions of the board and agreement to engage constructively with regard the preparation of development plan documents. The process to identify how any unmet need is to be met in the housing market area and a Strategic Green Belt Review is supported.
- 2.2 Paragraph 1.21 indicates that this process has started and is expected to take at least 12-18 months. This reflects the Strategic Work Programme presented to the Oxfordshire Growth Board on 20th November 2014 and which the board resolved to endorse.
- 2.3 These principles include:
- A recognition that joint work on future spatial options, transport infrastructure and green belt will be required to feed into Local Plans;
 - Recognition that the City cannot fully meet its housing needs and there is a need to agree on the level of unmet need; and
 - Work on determining spatial options in Local Plans can commence alongside this process.
- 2.4 The endorsed timetable includes a 12-18 month process, as noted in LPP1, which identifies the following relevant milestones:
- Further identification and refinement of Oxford's unmet housing need by March 2015

- The outcome of a Green Belt Review by June 2015
- Distribution of unmet need amongst Districts by August 2015

2.5 Having regard to the Vale's Local Development Scheme, this indicates that the outcome of a Green Belt Review and distribution of unmet needs is expected to be available before the end of the LPP1 examination and the adoption of LPP1 in October 2015. On this basis, LPP1 would clearly be out of date on adoption as it does not take account of Oxford's unmet needs. This clearly cannot be considered a sound approach having regard to the NPPF (notably paragraphs 47, 157 and 179).

2.6 NPPF paragraph 47 requires authorities to ensure Local Plans meet the full objectively assessed needs in the housing market area, paragraph 157 requires plans to take account of longer term requirements and be kept up to date and paragraph 179 that strategic priorities (including the homes needed in the area) are properly co-ordinated and reflected in individual Local Plans.

2.7 If LPP1 proceeds to adoption in advance of undertaking a strategic Green Belt Review around Oxford it clearly cannot address the above requirements of the NPPF.

3.0 NEED FOR A STRATEGIC GREEN BELT REVIEW

3.1 Jewson Holdings consider that a further strategic review of the Oxford Green Belt is essential to enable Oxfordshire's objectively assessed housing needs to be met.

3.2 The Green Belt should not be regarded as a reason why objectively assessed needs cannot be met but it is acknowledged that Green Belt boundaries should only be altered in exceptional circumstances and through the preparation of a Local Plan (NPPF, paragraph 83).

3.3 The extent of Oxford's un-met housing need constitutes an exceptional circumstance justifying a strategic review of the Green Belt. This was highlighted by the Cherwell Local Plan Inspector in advising Cherwell District Council to suspend their examination in June 2014. At that point the extent of Oxford's housing needs was undefined.

- 3.4 Oxford City Council have now published the Oxford Housing Land Availability and Unmet Need Assessment (URS, December 2014). This study has identified a maximum potential for 10,212 dwelling within Oxford City to 2031. Table 11 of this assessment then quantifies the extent of unmet housing need against the objectively assessed housing needs for Oxford as presented in the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014.
- 3.5 It concludes that there will be an unmet need of between 13,788 and 21,788 homes with a mid-point of 17,788 homes. This is a significant quantum of unmet housing need which clearly justifies a strategic Green Belt Review including the area of Green Belt within the Vale.
- 3.6 Given this recent evidence such a review should take place without delay and inform the Vale's LPP1. Core Policy 2 infers that the scale of unidentified need for Oxford remains to be identified and that Vale's response through its Local Plan will depend on the scale of need to be accommodated. It is clear that LPP1 will be left behind and will be out of date, even before it is adopted, should a strategic Green Belt review not take place at the current time to inform the development strategy.
- 3.7 Further justification for a Strategic Green Belt Review is provided by research commission by the University of Oxford and Science Oxford with support from the Oxfordshire Local Enterprise Partnership – *'The Oxford Innovation Engine; Realising the Growth Potential, SQW, October 2013'*. This identifies the need for significant further growth around Oxford to support the city's function as an internationally significant knowledge and science hub.
- 3.8 These conclusions have been reflected in Oxford City Council's growth strategy route map which identifies that Oxford's economy is being undermined by a lack of housing availability and that the City's leading businesses, universities and hospitals are experiencing severe difficulty in the recruitment and retention of staff.
- 3.9 This is clearly of significant importance to Oxford City and Vale's LPP1 given the NPPF requirement to ensuring the planning system does everything it can to support sustainable economic growth (NPPF, paragraph 19).
- 3.10 Given the scale of Oxford's unmet housing need across the plan period to 2031 – some 17,788 homes – it is clear that a strategic Green Belt review is required to address Oxford's unmet housing needs and should include Land at Farmoor.

4.0 GREEN BELT REVIEW PRINCIPLES – CONNECTIVITY TO OXFORD

- 4.1 The NPPF states, at paragraph 84, that when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.
- 4.2 Oxford City Council has carried out an initial investigations into the potential to accommodate urban extensions in Oxford's Green Belt. This includes two documents including '*Investigations into the potential to accommodate urban extensions in Oxford's Green Belt, Oxford City Council May 2104*'. A further study was published by the City Council in October 2014 having been undertaken by Turley Associates and is titled '*Oxford Strategic Growth Options – High Level Review of Opportunities*'.
- 4.3 These assessments are based on the reasoned assumption that Oxford's housing needs will be most sustainably met close to the city and as such have focussed on urban extensions. Whilst Jewson Holdings' land at Farmoor has to date not been considered in these assessments, their principles are equally relevant to Land at Farmoor and include:
- Oxford itself is a focus of the knowledge economy being a centre of growth and having a concentration of science based and high tech industries (the other being Science Vale).
 - There is an acute housing affordability crisis in the City with a need for new housing to support employers, the Universities and hospitals in staff recruitment and retention
 - Development at the country towns is already taking place and is required to meet the housing needs of the other Oxfordshire districts
 - Transport links such as bus routes are already in place so will not usually need to be created
- 4.4 It is clear, therefore, that there are a number of key drivers which favour meeting as much as possible of Oxford's housing needs close to the City and on key sustainable transport corridors. Connectivity and access to sustainable transport is, therefore, a key locational criterion.
- 4.5 Land at Farmoor lies on an existing high frequency bus route and within cycling distance of the centre of Oxford. It can contribute to the proposed B4044 Eynsham to Botley cycle route and as such is well located to provide sustainable access to the city.

5.0 GREEN BELT REVIEW PRINCIPLES –THE SETTING OF OXFORD

- 5.1 A review should also consider the implications that development would have on the purposes and function of the Green Belt. These are defined in the NPPF as:
- Check the unrestricted sprawl of large built up areas;
 - Prevent neighbouring towns from merging into one another;
 - Assist in safeguarding the countryside from encroachment;
 - Preserve the setting and special character of historic towns;
 - Assist in urban regeneration;
- 5.2 Oxford City Council's assessment of potential urban extensions, identifies two particularly important characteristics of the countryside around Oxford:
- Views across Oxford's shallow valley including the famous 'dreaming spires' with a green backdrop including wooded hills
 - The green corridors within Oxford formed by the River Thames and River Cherwell penetrating into the heart of the city
- 5.3 With regard the important views and backdrop of the city, these are identified in the Landscape Character Assessment of Oxford (Land Use Consultants, 2002). Figure 1.1.8 of that assessment identifies the ridgelines and view cones important to the setting of the City (See **Appendix 2**).
- 5.4 The higher ground around Wytham Woods (noted as number 24 on the plan) is identified as of importance. These view cones clearly do not extend to Farmoor which lies on lower vale farmland on the western edge of Figure 1.1.8. Whilst such farmland has its own landscape characteristics, it is not of particular importance to the historic setting of the city.
- 5.5 It is noted that the Vale of White Horse has conducted a localised Green Belt Review (Kirkham Landscape Planning Ltd / Terra Firma Consultancy, February 2014). This has not specifically assessed land at Farmoor under the control of Jewson Holdings.
- 5.6 Section 12 of the Kirkham Green Belt Review, however, reviews a number of settlements washed over by the Green Belt, to consider whether their built up areas should be removed from and inset into the Green Belt. Paragraph 86 of the NPPF provides the policy context for such a review, identifying that settlements which have an open character which make an important

contribution to the openness of the Green Belt should be included and washed over by the Green Belt designation.

- 5.7 Farmoor village is described as estate development with a density and pattern which is in contrast with the open landscape around. The review recommended that Farmoor is removed from the Green Belt and the village inset. Whilst expansion of Farmoor into the Green Belt clearly requires consideration against the Green Belt purposes and other planning considerations, it indicates that Farmoor is less sensitive in terms of its contribution to the Green Belt.
- 5.8 In addition and as noted above, connectivity with the city by sustainable modes is a key locational driver when identifying land to accommodate Oxford's unmet housing needs and the Land at Farmoor is well located in this regard. The presence of other constraints (such as national environmental designations/flood risk) or opportunities are also relevant. These are included in the summary assessment of land at Farmoor below.

6.0 LAND AT FARMOOR – DEVELOPMENT POTENTIAL

- 6.1 The land under Jewson Holdings' control at Farmoor lies between the B4044 and B4017. The land extends to 9.36ha and is identified on the plan attached as **Appendix 1** to these representations. The land is available and suitable for residential development and can deliver around 250 dwellings. Other land may also be available in this area and should be considered through a comprehensive Green Belt Review.
- 6.2 The site lies on the edge of Farmoor approximately 3.5km to the west of the employment centre at Botley and 5km from the centre of Oxford. It is, therefore, within sufficient cycling distance of the City. Eynsham lies 4km further to the west where there is a further significant employment centre including the Siemens Magnet Technology centre, office and industrial parks.
- 6.3 A high frequency bus service (S1, every 15 minutes) runs along the B4044 past the site connecting to Oxford, Eynsham and Witney.
- 6.4 There are proposals for an off-road cycle route between Eynsham, Farmoor and Botley (www.b4044path.org) which will provide an attractive cycle way linking Farmoor to these employment centres. Development of land at Farmoor can contribute to the implementation of the cycle path through developer funding.

- 6.5 Vehicular access is available to the B4044 and the B4017. The A420 lies 2km to the west and with the A34 only 3.5km giving good access to the regional road network.
- 6.6 The site has good connectivity to Oxford and wider road network. This is particularly with regard the potential for access via sustainable transport modes to key areas of employment – noting that need for housing to support the economy and provide good access to the labour.
- 6.7 Farmoor itself has a range of facilities including a shop, church, employment areas and access to a library. The reservoir adjoining the village is a recreation area with walks, fishing and a sailing club. There is no school in the village the nearest being at Cumnor 3km to the south. Although popular and nearing capacity there may be potential to expand the school onto adjacent land. Alternatively should sufficient land be allocated at Farmoor, a school could be provided on site enhancing the range of facilities available in the village. Similarly the provision of other community facilities could be considered alongside new housing development.
- 6.8 The site itself comprises relatively flat and unremarkable grassland divided into two fields by a hedgerow. It is contained by higher ground to the north (Wytham Woods) and south rising up to Cumnor.
- 6.9 The northern edge is bounded by a hedge with the B4044 Eynsham to Botley Road beyond. There is a car sales garage and workshops adjoining the northern edge of the site. The south western edge is bounded by a hedge with the B4017 Cumnor Road beyond.
- 6.10 The eastern boundary is marked by hedgerows and a path (not a public right of way) along which are two existing dwellings Lane House and Lane Barn. Just beyond the southern corner of the site is a small group of dwellings at Oakes Lane and offices in converted barns at Farmoor Court. Further to the south is a collection of further barns included two listed barns now converted to dwellings.
- 6.11 On the western side of the Cumnor Road is the residential area of Farmoor comprising mostly two storey and estate housing. Adjoining this is the Farmoor Reservoir and Thames Water Treatment Works.

- 6.12 The site lies in Flood Zone 1 (Low Risk). There are no designated heritage assets or nature designations within the site. Wytham Woods to the north of the B4044 is a SSSI but will not be affected by development on the site.
- 6.13 Overhead Power lines cross the site south west to north east (as shown in the plan at **Appendix 1**). A water main also crosses the site north west to south east. These infrastructure constraints will need to be reflected in any development layout.

7.0 LAND AT FARMOOR - ASSESSMENT AGAINST GREEN BELT REVIEW PRINCIPLES

- 7.1 Table 1 below presents a summary assessment of the site against the key Green Belt review principles identified.
- 7.2 In summary it development of Land at Farmoor has the following strategic advantages:
- Good connectivity to Oxford by sustainable modes with potential to contribute to the delivery of the B4044 strategic cycle path
 - Preserves the historic setting and green backdrop of Oxford's dreaming spires as it does not have a visual connection with Oxford
 - Would be a planned village extension and not result in urban sprawl
 - Would maintain a significant open gap between settlements and would avoid coalescence
 - Adjoins an existing settlement and is already subject to urban influences – development would be seen in this context and not unduly encroach into the countryside
 - Would help meet Oxford's unmet housing need and support the growth and economic success of the city and wider area.
- 7.3 Land at Farmoor should be included in a strategic Green Belt review and identified for development. Such a review is required to inform the development strategy for the Vale. In the absence of a strategic Green Belt review, the LPP1 cannot be considered sound.

Table 1 Summary Assessment against Green Belt Review Principles

Principles	Assessment
Connectivity with Oxford	Land at Farmoor lies on an existing high frequency bus route and within cycling distance of major employment areas at Botley and the city centre. Development can contribute to the implementation of the B4044 Eynsham to Botley cycleway providing strategic cycle access to the city. Good access to the strategic road network can also be achieved including the A420 and A34.
Preserve the setting and special character of historic towns;	The land does not have a visual connection with Oxford and the famous dreaming spires. It does not form part of the green backdrop to the city. Development on land at Farmoor would not impact the historic setting and character of Oxford.
Check the unrestricted sprawl of large built up areas;	Located several km beyond the existing edge of Oxford defined by the A420 with very little built development the existing urban edge and Oxford. A planned extension to Farmoor village would not represent urban sprawl. A significant open rural gap between the edge of Oxford would remain.
Prevent neighbouring towns from merging into one another;	Development on Jewson Holdings' Land at Farmoor would not cause any towns or villages to merge. A significant open and rural gap of 2km would remain between Farmoor, Cumnor and the A420 at Botley.
Assist in safeguarding the countryside from encroachment;	Land at Farmoor comprises low lying vale farmland adjoining the existing settlement of Farmoor including existing modern residential estate development, a business park and workshops and the Farmoor Reservoir and Water Treatment works. The land is crossed by overhead power lines and defined by existing roads and hedgerows. The land is subject to urban influences and development would be seen in this context.
Assist in urban regeneration;	This principle is not considered of relevance with regard Oxford. The scale of Oxford's unmet housing need is significant and is in addition to the development of sites within the urban area as identified through the Oxford SHLAA.

Other constraints and opportunities	Development on Land at Farmoor can contribute to the delivery of the B4044 strategic cycle path between Eynsham and Botley. Subject to the scale of development identified additional village facilities, including a school may also be provided. The site is not subject to any national heritage or natural designations. The presence of overhead power lines and a water main can be taken account of in any development layout.
-------------------------------------	---

8.0 OTHER LOCAL PLAN POLICY OBJECTIONS

- 8.1 Jewson Holdings' representations with regard Core Policy 2 identify that the plan is unsound in advance of a strategic Green Belt review to address Oxford's unmet housing needs.
- 8.2 In carrying out such a review including Land at Farmoor it is clear the overall development strategy will change particular with regard the Oxford fringe sub-area. The settlement hierarchy also has the potential to change - for example should Land at Farmoor be identified forming an expanded village with additional community facilities.
- 8.3 As a consequence, Jewson Holdings consider that overall development strategy is unsound, including Core Policy 3: the Settlement Hierarchy, Core Policy 4: Meeting Our Housing Needs and Core Policy 8: Spatial Strategy for Abingdon and the Oxford Fringe.