

## Introduction

This response to the Vale of White Horse Local Plan 2031 Part 2 Plan Publication Version Consultation (October 2017) is submitted on behalf of Taylor Wimpey Ltd. Taylor Wimpey Ltd controls some 4.1 hectares of land to the north of the A420 and to the east of Fernham Gate, Faringdon.

Our Clients have taken an active role for several years in reviewing and responding to the emerging planning policy framework within the Vale of White Horse. To that end, they have participated in previous consultations to the Part 1 and 2 Plans, as well as the Examination in Public of the Part 1 Local Plan.

Most recently, representations were made by LRM Planning on behalf of Taylor Wimpey Ltd in relation to the Part 2 Plan Preferred Option Plan in May 2017. The representations submitted in May 2017 particularly focused on the Plan's spatial strategy. The Plan had sought to introduce a new and different spatial strategy to that which had been independently assessed through the Part 1 Plan and found to be sound.

These representations, which are submitted to the Publication Version of the Part 2 Plan continue to focus upon the most appropriate strategy for the Part 2 Plan to adopt, in the context where:

- 1) the National Planning Policy Framework (hereafter NPPF) outlines that it must be a sound Development Plan document which should be prepared positively, be the most appropriate strategy when considered against reasonable alternatives, be deliverable and be consistent with national policy;
- 2) the Part 2 Plan seeks to redistribute housing provision identified to meet the Vale's own housing needs, in a manner inconsistent with the Adopted Part 1 Plan;
- 3) The apportionment figure for the Vale related to Oxford's unmet need is likely to increase;
- 4) the Part 1 Plan, together with the Part 1 Plan's Inspector's Report and the Council's own evidence base supports the identification of Faringdon as being a focus for development over the Plan period; (5) the Part 1 Plan, its supporting evidence and the Part 1 Plan Inspector all acknowledge the need for further housing to be focused in the Western Vale sub-area through the Part 2 Plan;
- 5) the Part 2 Plan proposes to allocate additional strategic sites, which will have long lead-in times. The reliance on large strategic sites is already causing housing land supply issues within the Vale;
- 6) in line with evidence prepared by Government, not all extant planning permissions will deliver or deliver in full;
- 7) the windfall allowance for the Part 2 Plan has not been adequately justified; and
- 8) The use of nationally derived space standards and the requirements relating to accessible and adaptable housing are unjustified.

This representation, which forms our Client's full and complete response to the Publication Version, is set out in the following order:

- Site description;
- Planning History;
- Development proposals;
- The NPPF;
- Spatial strategy and the distribution of housing;
- Housing Supply; and
- Development Management matters.

The representation is also supplemented by a Development Framework Document relating to proposals at Fernham Gate, Faringdon, which provides a more detailed analysis of the development proposals and the supporting technical information. For the reasons set out in this representation, alterations are required to the Part 2 Plan in order to make it sound, which includes allocating the subject site for housing.

## Site Description

Land to the north of the A420 and east of Fernham Gate measures approximately 4.1 hectares. It is a broadly rectangular parcel of land, which is greenfield in nature. Faringdon is identified as one of three foci of development in the Part 1 Plan.

The site is bounded by residential development to the west, playing fields to the north, a garden stone retail outlet to the east and a highway to the south. The site's boundaries are generally defined by mature hedgerow planting to the north, hedgerow planting and fencing to the east and west and the A420 to the south.

It is situated immediately adjacent to the established residential envelope of Faringdon. It is within an acceptable walking distance of a range of community services and facilities, including education provision and a leisure centre. Local retail provision is located to the north of the site on Folley View Road and Park Road.

A number of bus services pass in close proximity to the site, offering services to a range of locations including Faringdon Town Centre, Swindon and Oxford. Similarly, given the site's location and proximity to the existing urban fabric, it is considered to offer the potential for walking and cycling links to a range of local services. The subject site is also well located to a number of key existing and emerging employment locations including to the north of the site, clustered around Park Road.

## Development Proposals

Taylor Wimpey Ltd is promoting the subject site for:

- The construction of up to 70 dwellings;
- Primary access from Fernham Road (as agreed in principle with Oxfordshire County Council);
- Public open space;
- A buffer and habitat benefit area; and
- Associated infrastructure.

The accompanying Development Framework Document demonstrates how the proposed development can be sustainably accommodated on the site, having regard to the technical information presented therein. It should be noted that the Development Framework Document provides more up-to-date information, including a revised masterplan, to that previously submitted through the HELAA process. We note that the Council's latest HELAA identifies the site as being suitable, available and achievable for housing (site ref FARI015 refers).

## Planning History and Context

There is no relevant planning history associated with the subject site.

Notwithstanding the above, the site was subject of a pre-application enquiry in Summer 2016. The principal reason that the Council would not support an application at that point in time concerned the District's housing land supply. Other more technical matters were also raised, principally relating to landscape and noise. Further work has been undertaken by Taylor Wimpey in respect of both matters and the conclusions of this updated work have been taken into account into the revised masterplan provided within the accompanying Development Framework Document.

Notwithstanding the above, there are a number of applications in the surrounding environs that are relevant. These are:

1. **Land off Park Road, Faringdon (Ref: P13/V0709/O)** - Outline application for residential development (up to 380 units including up to 64 extra care units), employment development, a primary school, allotments, public open space and associated infrastructure with new access from Park Road. The application is not yet decided.
2. **Land adjoining Coxwell Road, Faringdon (P13/V0139/O)** - Outline planning application for residential development of up to 200 houses, public open space, associated infrastructure and new access. Outline planning permission was granted on 14th January 2015. An application to reduce the affordable housing obligations was subsequently allowed on Appeal (ref: P15/V1323/MPO).
3. **The Steeds, Faringdon (P15/V1934/O)** - The erection of up to 200 dwellings together with Green Infrastructure, surface water attenuation and a new access from Coxwell Road. The application was approved on 23<sup>rd</sup> May 2016.
5. **Land adjacent to Fernham Gate, Faringdon (P15/V0154/O)** - Outline application for erection of 10 dwellings and associated parking and landscaping, new access onto Fernham Road. Planning permission was granted on 22nd April 2015.

Accordingly, in the context of the applications identified above, the subject site is a logical infill development opportunity that can be sustainably accommodated in the existing built and natural environment, whilst providing a valuable source of housing. The principle of development in this broad location has clearly been accepted.

## **NPPF**

The NPPF establishes the Government's planning policies and provides guidance on how these are expected to be applied.

In terms of plan-making, the NPPF outlines that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, the emerging Part 2 Plan should be consistent with the principles established in the NPPF, including the presumption in favour of sustainable development.

Each Local Authority is expected to produce a Local Plan, which should:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
- Be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements and be kept up-to-date;
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;

- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- Identify areas where development would be inappropriate; and
- Contain a clear strategy for enhancing the natural, built and historic environment and supporting National Improvement Areas where they have been identified.

The NPPF outlines that to boost the supply of housing significantly, local planning authorities should ensure that their Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area (para. 47 and 159 refer).

Para. 182 of the NPPF indicates that on Examination an Inspector is asked to consider whether the Local Plan is 'sound'. To be considered as 'sound' a Local Plan must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; and
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the priorities in the NPPF.

For the reasons outlined within this representation, the Part 2 Plan cannot currently be considered as being justified, effective or consistent with national planning policy. The proposed amendments to the Plan provided at the end of this representation would help address these concerns.

## **Spatial Strategy and the Distribution of Housing**

The following section provides information on our Client's concerns relating to the spatial strategy adopted in the Part 2 Plan and the proposed distribution of housing. The section is structured as follows:

- Settlement hierarchy;
- The relationship between the Part 1 and 2 Plans and the redistribution of the Vale's housing needs;
- Sub-area housing requirements;
- The Western Vale and the role of neighbourhood planning; and
- The geographic distribution of growth.

Each is addressed below in turn.

### **Settlement Hierarchy**

Whilst we are primarily concerned with the distribution of development proposed in the Part 2 Plan, these concerns cannot be divorced from the strategic planning role and function afforded to Faringdon, within the Development Plan's settlement hierarchy. This settlement hierarchy underpins the strategy for distributing development in the District.

Successive planning strategies have sought to focus new development at the market town, as one of the principal settlements within the Local Authority area. Such a strategy ensures that homes are provided closest to where most jobs are likely to arise and where there is the greatest potential to secure increased public transport investment and usage and where there is the greatest range of services and facilities.

Indeed, Core Policy 3 of the recently adopted Part 1 Local Plan (December 2016) states that:

***“Market Towns are defined as settlements that have the ability to support the most sustainable patterns of living within the Vale through their current levels of facilities, services and employment opportunities. Market Towns have the greatest long-term potential for development to provide the jobs and homes to help sustain, and where appropriate, enhance their services and facilities to support viable and sustainable communities in a proportionate manner.”***

This strategy, which was assessed through Independent Examination and found to be sound, is firmly based on sustainable development objectives, including those contained within the NPPF (paras. 30, 34 and 37 refer). Given the adopted status of the Part 1 Plan, it follows that in the context of para. 182 of the NPPF, the spatial strategy must be the most appropriate when considered against reasonable alternatives. Therefore, any other strategy for accommodating in the District cannot be appropriate and would consequently be an unsound proposition.

We are concerned that the specific policies provided within the Part 2 Plan will reduce the role and function of Faringdon within the settlement hierarchy, undermining its ability to meet the development needs of the Vale and potentially its neighbouring authorities, as was originally intended. For the reasons outlined above, this is unsound.

### **Relationship between the Part 1 and 2 Plans and the Redistribution of the Vale’s Housing Needs**

The new Development Plan for the Vale is intended to comprise several Development Plan Documents, with the principal elements being the Part 1 and 2 Local Plans, the roles of which are defined in the Part 1 Plan.

Specifically, para. 1.1 and Policy CP3 of the Part 1 Plan confirmed that it would:

1. Establish the spatial strategy for the District;
2. Identify the number of new homes and jobs to be provided in the area over the Plan period to meet the Vale’s own development needs in full;
3. Set out the strategic policies to deliver sustainable development;
4. Allocate large-scale, strategic sites. In the case of housing, the minimum threshold was 200 dwellings.

Para. 1.1 of the Part 1 Plan also confirms the role of the Part 2 Plan as being:

- To establish policies and locations for housing to meet the Vale’s proportion of Oxford’s housing need, unable to be accommodated within the City’s boundaries;
- Policies relating to the Didcot Garden Town;
- To allocate additional development sites for housing and other uses; and
- Other detailed development management matters.

It therefore follows that the housing provision, including the proportional distribution of development identified in the Part 1 Plan was required to meet the Vale's own housing need in full. This was an issue which is beyond the scope of the Part 2 Plan and should be considered as being a settled matter.

It therefore follows that it is fundamentally wrong as a matter of process and procedure for the Part 2 Plan to propose a new and different strategy as that is at odds with the defined role of the Part 2 Plan.

In terms of the Western Vale, the Part 1 Plan identified that it had a role and function of delivering a housing supply in excess of what the Local Planning Authority considered was necessary to meet housing needs derived from the area. The over provision was considered necessary to meet the Vale's overall need for housing in full. This strategy was considered against reasonable alternatives within the iterative Sustainability Appraisal process, assessed through Independent Examination and found to be sound (para. 137 and 138 of the Inspector's Report refers).

In addition, given the Western Vale's role in meeting the Vale's own needs, it would therefore follow that when considering potential allocations in the Part 2 Plan to meet Oxford's unmet housing need, it would be logical to assume the requirement for the sub-area would also increase in a proportionate manner. Any deviation from that distribution would result in a different strategy being followed, which would be at odds with the Part 1 Plan.

However, despite its tightly defined role outlined above, which does not include matters relating to the spatial strategy and the proportional distribution of housing, the Part 2 Plan seeks to reduce the contribution the Western Vale sub-area will make in actual and proportional terms both when considering the total Part 2 Plan's housing requirements and, significantly, when assessing the Vale own housing needs in isolation.

Page 19 of the Consultation Plan confirms that the Vale's apportionment of Oxford's unmet housing need (currently 2,200 dwellings) will be delivered from sites allocated in the Part 1 and 2 Plans, located within the Abingdon-on-Thames and Oxford Fringe sub-area.

The justification for this distribution is provided in para. 2.16 of the Part 2 Plan. The proximity of the Abingdon sub-area and its frequent and reliable public transport linkages to Oxford is cited as being the principal justification for the distribution strategy. This is a different strategy to that proposed in the previous iteration of the Part 2 Plan, wherein the unmet need was to be provided within both the Abingdon and South Eastern sub-areas.

Whilst the unmet housing need will now be met closer to Oxford than previously proposed, the Council is reliant upon sites from the Part 1 Plan, which were assessed and considered suitable to accommodate the need and demand for housing within the Vale itself. As outlined in the Council's Site Selection Topic Paper (October 2017), four sites allocated to provide 1,660 dwellings in the Part 1 Plan and therefore were identified to meet the Vale's own housing needs, are now to be used, together with one further site, to meet unmet housing needs from Oxford City.

Consequently, the distribution of housing assessed by the Part 1 Plan Inspector and found to be sound, has now been significantly revised, with the Abingdon sub-area, like the Western Vale, now having a reduced role in meeting the Vale's own housing needs, whilst the South Eastern Vale's role has significantly increased. Whilst the reduced role for the Abingdon sub-area is justified, no

justification is provided as to why the Western Vale was not considered to play its proportionate role in meeting the Vale's own housing needs.

Despite the Part 1 Plan establishing the important role the Western Vale should have in housing delivery in the Vale and Faringdon being one of 3 focuses for growth within the District, the Part 2 Plan does not seek to redistribute the housing that had previously been used to meet the Vale's needs, that instead will now be used to meet the unmet housing needs of Oxford City, to the Western Vale. It is instead focused within the South Eastern Vale, where there are significant concerns exist regarding the deliverability of the quantum of development proposed over the Plan period (see below for further detail of our concerns).

The redistribution of the Vale's housing needs in the manner proposed by the Part 2 Plan significantly alters the spatial strategy and distribution of housing within the Part 1 Plan, that was tested through Independent Examination and found to be the most appropriate strategy and indeed sound. Consequently, the revised strategy promoted by the Part 2 Plan cannot be considered the most appropriate strategy and is therefore an unsound proposition.

With the Inspector having endorsed the Part 1 Plan, it would be more appropriate for the unmet need to be distributed in accordance with its spatial planning framework. This would necessitate the Part 2 Plan recognising the role and function the Western Vale can and should play in meeting the Vale's housing needs and require additional allocations to be made in the sub area, in lieu of some of the allocations proposed in the Part 2 Plan in the South Eastern sub area.

The Sustainability Appraisal accompanying the Part 2 Plan again fails to assess all reasonable alternatives, including further allocations within the Western Vale to address the Vale's own unmet housing needs. Given the flawed strategy employed in the latest iteration of the Part 2 Plan, it follows that the Sustainability Appraisal must also be flawed. It only considers the credentials of the reduced role for the Western Vale, which is at odds with the Part 1 Plan's strategy for distributing development (para. 6.5.12 refers).

We also note that South Oxfordshire has sought to meet a lesser amount of Oxford's unmet housing need than indicated by the Growth Board, whilst Oxford City is to deliver a lower level of housing than previously envisaged. This might require the Vale to increase the amount of housing provided to meet Oxford City's unmet needs. We comment further on this below.

### **Sub-Area Housing Requirements**

As alluded to in our previous representations regarding the Part 2 Plan, we question the robustness of a sub-area housing requirement. The 'requirement' for the Western Vale is not an absolute expression of housing need and demand derived for the sub-area, rather it is an apportionment of the overall housing need in the Vale for each sub-area. This can most noticeably be seen in relation to the Western Vale, where the 'housing requirement' for the Vale has reduced by 75 dwellings from the Part 1 Plan, despite the Council undertaking no new assessment of housing need and demand in the area and the housing requirement increasing as a result of unmet housing need from Oxford City.

This is particularly important as the perceived 'over supply' of housing within the Western Vale sub-area is seen as justification for reviewing the need for additional housing in the sub-area to meet the Vale's own housing needs, but dismissing potential options to accommodate unmet housing needs from adjacent authorities in the Part 2 Plan.

## **The Western Vale and the Role of Neighbourhood Planning**

As indicated above, the Part 2 Plan does not allocate any housing sites in the Western Vale, as required by the Part 1 Plan. The Part 2 Plan does however support additional sites being allocated in future Neighbourhood Plans. However, a Neighbourhood Plan has already been made for Faringdon, which does not allocate any sites for housing. It therefore follows that the emerging policy would only therefore facilitate windfall development from within Faringdon, or allocations in settlements outside Faringdon, which are less sustainable and have less services and facilities.

We provide further comment on the windfall provision proposed in the Part 2 Plan in general terms and specifically for the Western Vale below.

## **Balanced Housing Provision – Geographic Distribution**

### **General Matters**

The new Local Plan recognises that in order to meet the identified objectively assessed level of housing need, the Vale will have had to identify land outside, but adjacent to existing settlements. As identified above, the Part 1 Plan provides the strategic policy framework and in the main, identifies the strategic allocations required to largely meet the requirement.

During the preparation of the Part 1 Plan, objectors raised concerns that whilst the level of housing proposed was distributed in line with the spatial strategy, it would, by virtue of its limited geography, not deliver in the manner envisaged. These concerns principally related to the South Eastern sub-area, where the majority of housing need is to be met.

Whilst the Inspector did not agree with these objections at that point in time, the additional housing allocations proposed in the sub-area, including the redistributed provision from the Western Vale area and the provision to meet the Vale's own housing needs from the Abingdon and Oxford sub-area, adds further validity to them, with a further 1,400 dwellings to be accommodated from just two sites.

This places a significant quantum of development, some 13,362 dwellings, in this narrow area. Alone, the South East sub-area needs to deliver an additional 11,826 dwellings over the remaining 14 monitoring years of the Plan. This equates to a rate of development of some 844 dwellings per annum, over this timeframe, when the area has to date only delivered an average of 256 dwellings per annum since 2011. This is a higher annual rate of development to that delivered across the whole District in the period 2011-2015. Additional growth adjacent to the sub-area, but within South Oxfordshire is also planned within their emerging Local Plan Final Publication Version – some 6,500 in Didcot alone (October 2017). We question whether this rate of development can be accommodated within this small housing sub-market, over the plan period.

There are already strong indications that the South Eastern sub-area cannot accommodate this level of planned growth. Most notably, the Appeal at Mather House and Greensands, White Road and Reading Road, Wantage (Appeal Ref: APP/V3120/W/16/3145234), where the Inspector concludes that the Council are already unable to demonstrate a 5-year supply of housing from within the 'ring-fenced' area of the District, which is located within the South Eastern sub-area.

The pursuit of this strategy, which has been accentuated by the Part 2 Publication Version, both in terms the proportion of housing relative to the overall requirement for the Authority and the number of housing proposed, risks the delivery of the overall housing need and demand for the Vale and the unmet need from neighbouring authorities. In such a circumstance, it is likely that the housing land supply will reduce to below 5-years once again, which will encourage planning applications on sites

note allocated in the Part 1 or 2 Plans which will be approved pursuant to the presumption in favour of sustainable development.

In our view, it is essential that a realistic geographic strategy is adopted, which reinstates the distribution of housing to the Western Vale and considers its role in accommodating Oxford's unmet housing need in line with the spatial strategy defined by the Part 1 Plan. The role envisaged for it in the Part 1 Plan needs to be reflected in proportionate terms in the Part 2 Plan. The delivery of the overall housing need must be afforded more importance than the pursuit of a strategy which is contrary to the adopted Development Plan, which is by definition the most appropriate strategy when considered against reasonable alternatives and which in all likelihood, is likely to fail in any event.

We provide further comment on the delivery assumptions employed within the Plan generally below, together with our concerns relating to the delivery of specific allocations proposed within the Part 2 Plan.

### Other Distribution Matters

We are concerned with the overarching distribution of development across the Authority area, in particular that it will not lead to a sustainable pattern of development.

For instance, we note:

- there are 130 dwellings proposed to be allocated at East Hanney. Given that there are only 326 households this would represent an increase in size of **nearly 40%**. We note that the sustainability Appraisal states that East Hanney is remote from both Oxford and the Science Vale (para. 10.4.6 refers).
- There are 600 dwellings proposed to be allocated at Kingston Bagpuize. However, there are only 935 households which means that allocation would be an increase in size of **nearly 65%**. Again, the Sustainability Appraisal notes that Kingston Bagpuize is "**is relatively distant from a higher order centre**" (para. 10.3.3 refers). It also indicates that contributions for health care provision from the proposed allocation will be spent in Faringdon (para. 10.3.3) demonstrating Faringdon's important role and function for Kingston Bagpuize.

We consider that this is a highly disproportionate amount of development for such small settlements, which the Plan's own evidence suggests are distant from higher order settlements, particularly given the availability of sites as at Fernham Road, Farindgon that are eminently suitable and in far more sustainable locations. Indeed, in such settlements we note that there are limited facilities (compared to the larger settlements) and new residents (who given the scale of development proposed, are highly unlikely to be from the respective villages) are likely to be reliant upon cars. In this regard, we feel that it is important that growth of small settlements is commensurate with their existing scale, role and function. At present the quantum of development focused at these settlements is not consistent with Policy CP3 of the Part 1 Local Plan. Consideration should be given to redistributing the provision identified for these settlement to higher order settlements, including Faringdon.

### Summary and Implications

Given the above, we are concerned that the Part 2 Plan seeks to introduce a new and different spatial strategy for accommodating development. By virtue of its adopted status, the strategy in the Part 1 Plan must be the most appropriate when considered against reasonable alternatives. Therefore, the strategy for accommodating the Vale's housing needs in the Part 2 Plan as currently written, which significantly differs to the Part 1 Plan. Any requirement to redistribute the Vale's own housing needs

should be made in the context of the Part 1 spatial strategy, which will necessitate an increase in the requirement and supply of housing in the Western Vale.

We are also concerned that the proposed allocations in the Part 2 Plan, together with existing commitments and allocations in the Part 1 Plan, are unlikely to deliver in the manner envisaged by the Council (this is discussed further in the housing land supply section of this representation). As such, it is considered that as currently written, the Part 2 Plan cannot be considered as being *positively prepared* (it is unlikely to deliver the objectively assessed need for development), *justified* (the Plan seeks to alter a strategy that was found to be sound at Examination and therefore must have been the most appropriate strategy), effective (it will not deliver as expected) and for these reasons, cannot be in accordance with national planning policy. We also have significant concerns with the robustness of the Sustainability Appraisal. Our suggested alterations to remedy these issues is provided at the end of this representation.

### Unmet Need from Oxford City

As outlined above, one of the main purposes of the Part 2 Plan is to identify a sufficient quantum of sites to meet the Vale's apportionment of Oxford's unmet housing need.

The Memorandum of Cooperation was published by the Oxfordshire Growth Board in October 2016. Its purpose was to **"...formally record and make public the Oxfordshire Local Authorities' agreement under the Duty to Co-operate to the position as set out in this Memorandum, subject to LPA ratification by their full Councils as part of their individual Local Plan preparation"** (para. 1.4 refers).

Working on the basis that the level of unmet need from Oxford City was 15,000 dwellings, the Vale of White Horse was provided with an apportionment figure of 2,200 dwellings. This figure has not been subject of any public consultation. We are also aware that South Oxfordshire is planning for a lower apportionment figure than the Growth Board's work suggested was necessary (see their Final Publication Version of the Local Plan).

The Memorandum identifies that the level of unmet need for Oxford will be tested through the Oxford City Local Plan Review (para. 3.3 refers). The latest information provided on Oxford City's website indicates that the Examination of the Local Plan Review will not commence until Spring 2019 at the earliest. This is several months after the last point that the Vale's Part 2 Plan can be submitted to the Secretary of State for Examination.

As the Examination of Oxford's Local Plan Review will provide the first opportunity for the level of Oxford's unmet need to be critically assessed, we are concerned that the Part 2 Plan does not presently provide any flexibility to accommodate additional levels of development in the event the Growth Board's current assessment of unmet need was found to be insufficient and consequently the Vale's apportionment figure was to increase.

In any event, the evidence emerging from work on the Oxford City Local Plan illustrates that the likely supply of housing land is less than had previously been assumed. The Preferred Strategy which was published as a consultation document in June 2017, provides contextual information relative to likely housing supply within the City's administrative area. The Oxford Housing and Economic Land Availability Assessment (HELAA) assesses the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. The HELAA estimates the capacity to be 7,511 for the period 2016-2036. In the previous work, the 2014 Strategic Housing Land Availability Assessment (SHLAA), a capacity for 10,212 dwellings for the period 2011-2031 was identified. It is apparent that the anticipated housing supply is diminishing from that which was assumed in the Growth Board distribution. It is possible therefore that the Oxford City unmet need figure is greater than the 15,000 assumed in the Growth Board apportionment.

Accordingly, it is necessary for the Plan to include an element of flexibility to cover the eventuality of having to accommodate a higher level of Oxford's unmet housing need than currently proposed.

## **Housing Supply**

We are concerned with the delivery assumptions relating to housing land supply. Whilst the Part 1 Local Plan Inspector considered the Council's delivery assumptions, as a result of changes in circumstance, including: additional allocations proposed in the Part 2 Plans and neighbouring authorities; the urgent need for housing within areas of the Vale; a potential increase in the apportionment of Oxford's unmet housing needs; and national housebuilders revising delivery assumptions on strategic sites, these matters are worthy of reconsideration. We are concerned that without a reconsideration, the Plan will not deliver the housing needed to meet the Vale's overall housing need, including the apportionment from Oxford City. It will therefore not be positively prepared, justified, effective or consistent with national planning policy. Consequently, the Plan will be an unsound proposition.

Our concerns principally relate to:

- Lead-in times for strategic sites;
- Delivery assumptions;
- The implication for housing delivery over the short term; and
- The implication for housing delivery over the longer term.

## **Lead-In Times for Strategic Sites**

In order to secure an implementable planning permission for strategic sites, which in the context of the Part 1 and 2 Plan is considered to be sites capable of delivering 200 dwellings or more, it will be necessary to:

- Determine an outline planning application (to resolution);
- Sign a S106 Legal Agreement;
- Undertake conveyancing;
- Prepare a Reserved Matters application;
- Obtain Reserved Matters approval / discharge of conditions;
- Site clearance / infrastructure; and
- First legal completions.

It is considered that this process could take up to 4 years. We note that a recent publication by a national house builder ('The role of Land Pipelines in the UK Housebuilding Process', September 2017) indicates that the process could take up to 6.6 years on average.

## **Delivery Assumptions**

As indicated above, we question whether the strategic allocations and particularly those around Didcot, will deliver in full by 2031. The uncertainty is heightened having regard to the distribution of development outlined in the South Oxfordshire Local Plan, which similarly focuses further growth around Didcot and the wider South East sub-area. The analysis which underpins these concerns is provided above and is therefore not repeated here.

This issue cannot be simply remedied by selecting alternative sites within the South East sub-area; it requires a reconsideration of a number of factors including more realistic build rates, having regard to both the availability of labour and the rate at which housing can be sold at viable level, having regard to the competition in such a narrow geography. Simply put, the Plan, together with South Oxfordshire's emerging Plan, focuses a quantum of housing that will not deliver at the rate envisaged. That market simply cannot deliver it.

It is considered that, in line with current national delivery rates, it would be appropriate to plan on the basis of 50 dwellings per outlet per annum. Moreover, the Report "*From Start to Finish: How quickly do large-scale housing sites deliver?*" (2016) indicates that sites up to 499 will deliver c.100 dwellings a year. Using this more realistic assumption would ensure that the housing trajectory was more *deliverable* and therefore *effective*.

The use of more realistic delivery assumptions, particularly in areas where there is a significant focus of development, will mean that a proportion of the Council's identified supply, will fall outside the Plan period. It will therefore be necessary to remedy this shortfall through the allocation of additional or alternative housing sites.

We have suggested above that it would be far more appropriate for the Vale's apportionment figure to be delivered in accordance with the Part 1 Plan's spatial strategy. This would dilute the focus of growth in the South East sub-area and provide a more realistic chance of meeting identified housing needs in full, in a manner that is consistent with the Development Plan.

We also have concerns relating to the deliverability of Dalton Barracks. Whilst the Part 2 Plan indicates that the site will be released by the Defence Infrastructure Organisation has indicated the site could be released sooner than originally thought and prior to 2029, the Sustainability Appraisal indicates that the site will be vacated by 2026 (page 90 confirms). This would provide 5 years to undertake site clearance, complete any site remediation and develop the full 1,200 dwellings. This would require an annual rate of delivery of 240 dwellings, which is considered to be a significant over estimation of true delivery rates. The allocation should therefore be reduced to reflect the site's true development potential up to 2031. Even if the site was to come forward for development now, and there are no signs that it is, it would take a minimum of 16 years to deliver using LRM Planning's delivery assumptions, which would push completion back to at least 2033/34, which is outside the plan period.

Furthermore, we are aware that similar assertions were made by the DIO in relation to the Ministry of Defence Site in Ashchurch during the formation of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, before the site was made unavailable for residential development by the DIO, just prior to the publication of the Main Modification of the Plan. The Part 2 Plan's Sustainability Appraisal also raises concerns relating to the deliverability of the allocation and the potential for the DIO's policy to alter and deliverability to slip further into the Plan period.

### Harwell Campus

We have specific concerns over the developability of the Harwell Campus proposal, which is allocated to provide 1,000 dwellings. This proposed allocation is located within the North Wessex Area of Outstanding Natural Beauty and is therefore extremely sensitive in landscape terms. Footnote 9 of para. 14 of the NPPF outlines that the development in the AONB should be restricted and therefore not automatically benefit from the presumption in favour of sustainable development, whilst para. 116 of the NPPF confirms that major development in these areas should be refused except where it can be demonstrated that there are exceptional circumstances and where it can be demonstrated that

it is in the public interest. In assessing whether a scheme would constitute an acceptable development, para. 116 also requires an assessment of whether:

- The need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- The cost of, and scope for developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which it can be moderated.

We note that a similar proposal, albeit in a slightly different location was proposed for allocation in the Part 1 Local Plan. In considering the proposal, the Part 1 Local Plan Inspector included that:

***"I recognise the importance of Harwell Campus to the local, regional and national economy and do not doubt that some existing or potential employees at the campus would wish to live there. However, there is little, if any, evidence to support the contention that this is essential to the realisation of the employment growth which the plan and the Oxfordshire Strategic Economic Plan (SEP) envisage taking place at Harwell in the period to 2031..."***

***...no details have been provided of any businesses who have indicated that they would only, or even be more likely to, locate at Harwell if it were to be developed as a work-live-play campus. Evidence in the form of third party 'validations' refers to the need for convenient and affordable housing (particularly to rent), although there is nothing to suggest that this could not be appropriately provided for a short distance from the campus outside the AONB..."***

***...I have seen no convincing evidence to indicate that any existing or new employers at Harwell would, in the future, not be equally successful in attracting people to work there as long as there is sufficient, suitable housing within the Science Vale area generally..."***

***...Moreover, there is no convincing evidence to indicate that refusing such development would have an adverse effect on the local economy. The updated Sustainability Appraisal's assessment of the modified plan in this respect is therefore appropriate." (paras 115-118 refer).***

We note that since the previous iteration of the Part 2 Plan, the Vale of White Horse District Council Commissioned a Report which has sought to demonstrate that the exceptional circumstances exists to allocate the site to accommodate residential development. We however do not believe that the Report adequately makes the case for the following reasons:

- The Report does not identify any businesses who indicate that they are more likely to locate at the Harwell Campus if the residential development was to proceed. Whilst the case studies presented by existing occupiers identify difficulties in recruiting, they stop short of outlining that the proposed residential development will lead to their expansion. The potential increase in the number of jobs that could be accommodated on the Campus is therefore just hypothetical and lacks the necessary certainty;
- No compelling evidence has been provided that demonstrates that the employment land provision at the Campus would not be delivered without on-site residential development;
- There is no compelling evidence that not allocating the site for residential development would have an adverse impact on the local economy – the 'do nothing' scenario has not been presented;
- In the absence of any certainty over whether the employment allocation will be taken forward at the level envisaged, it appears disproportionate to allocate 1,000 dwellings to support an existing employment site that employs only 5,500 people. There is no evidence to

demonstrate that 1,000 dwellings are even required. As the allocation is to meet the Vale's own housing need and demand, the need for 1,000 dwellings linked specifically to the Campus should be clear identified within the Vale's own OAN work. No such evidence has been provided;

- The economic impacts during the construction phase are typical of any residential development and are not unique. Given the quantum of housing proposed within the area and the relationship house builders have with the local labour force, it is considered unlikely that the level of jobs and net spend within the local area would compare with that delivered by conventional residential developers;
- The Report indicates that a main reason for the residential development is to provide affordable housing (para. 4.14, Box 4 and Box 5 refer) to address the needs of young workers. These are circumstances that present themselves across the District and are not unique;
- The Part 1 and 2 Plan provides 12,362 new dwellings within the South Eastern Vale (excluding the Harwell Campus allocation). In line with Policy CP24 of the Part 1 Plan, 35% of this housing should be affordable. Therefore 4,327 dwellings will be delivered as affordable housing, within a short commuting distance from the Campus. We therefore dispute the claims made in para. 4.23 of the Report;
- The Plan provides the ability for affordable housing exception sites to be delivered across the District (Policy CP25 refers). This could be provided a short distance from the Campus and outside the AONB;
- The Council has already provided a policy response to the housing mix requirements of the District in Core Policy 22. As the scheme meets the housing needs of the Vale, it should have already been considered through the latest SHMA, yet there is no reference to the need within the latest SHMA (2014) and specifically within Chapter 8;
- No evidence is provided to justify the claims made in para. 7.10 that the incidence of homeworking will be high. It should be assumed that spouses / partners will work off-site and therefore fall foul of the long commuting patterns referred to in para. 4.3 of the Report;
- The Report does not assess any alternatives for accommodating the 'required' housing outside the AONB, including working with a Registered Provider; and
- As evidenced within the Council's HELAA, there is a **"large pool of sites"** (para. 3.1 of the HELAA refers) within the Vale for this provision to be made elsewhere. There isn't the constrained theoretical supply referred to in para. 5.4 of the Report.

Given the above, there does not appear to be any evidence base documents that demonstrate that exceptional circumstances exist to warrant the development proposal.

In addition, the allocation is proposed in a location that is already allocated within the Part 1 Plan (Policy CP15 refers) for employment purposes. The proposed policy therefore conflicts with the Adopted Local Plan. The provision of residential development in this area will significantly adversely impact on the strategic importance of this allocation for the local, regional and national economy.

### **Balanced Housing Provision – Role of Non-Strategic Sites**

The Part 2 Plan should recognise that there is a need to allocate a balance of housing sites, both strategic and non-strategic sites, in accordance with the settlement hierarchy.

Such a strategy would provide the most realistic chance of the objectively assessed level of housing for the Vale, together with the any unmet need from neighbouring authorities, being met over the short and longer term. It would also ensure that a range of housing types could be provided, including the provision of quality family housing, both open market and affordable, will be delivered.

As noted above, despite the Part 1 Plan only being Adopted some 11 months ago, there has already been a shortfall of housing land within parts of the District. This can, in part, be attributed to the Plan's strategy, which has focused growth at a number of strategic sites (over 200 dwellings).

This issue has been compounded by the Part 2 Publication Plan. Whilst it was the role of the Part 1 Plan to identify strategic sites capable of accommodating over 200 dwellings, we note that the Core Policy 4a of the Part 2 Plan proposes the allocation of 4 of 7 additional housing sites over the 200 dwelling threshold, three of which are to accommodate 600 dwellings or over, with two 1,000 dwellings or over.

These strategic sites are often complex, require significant infrastructure and have long lead-in times. For instance, we are aware that a national house builder has already raised concerns with the Council's delivery assumptions concerning their site at the Grove Airfield, which was allocated in the Part 1 Plan (the developer has indicated that 846 dwellings of the 2,500 dwelling allocation will be delivered outside the Plan period).

To ensure that the overall level of housing need and demand for the Vale is met in full over the plan period, there is an obvious role for smaller, non-strategic sites to provide development land throughout the plan period. Where this involves no conflict with properly identified constraints, it represents a valuable source of housing potential.

Such sites generally have additional merits. They often will be more straightforward to implement; they can contribute to the mix and range of housing opportunities consistent with Government Policy; and will ensure a continuous supply of housing over the plan period. They therefore will add flexibility to the Council's housing supply and should be included in emerging Part 2 Plan.

In this regard, we note that the summary findings and conclusions of the consultation Part 2 Plan's Preferred Option Sustainability Appraisal identifies that the most positive option for the delivery of housing is for the least reliance on large sites, whilst option 2 (less reliance on large sites) performed well in overall terms. Given these findings, it is highly surprising to note that the Publication Version of the Sustainability Appraisal now identifies a strategy which promotes larger sites as performing the best of three options. The consideration of alternative options, including land in the Western Vale may well have improved the conclusions of allocating a greater number of smaller sites further and we note that there wasn't a consideration of the deliverability of the strategy taken into consideration.

The Part 2 Plan's Sustainability Appraisal is also flawed in relation its analysis of the Western Vale's housing requirement and supply. The Report completes the assessment based on the reduced housing requirement for the Western Vale in the Part 2 Plan, rather than the higher requirement in the Part 1 Plan. No assessment of the sustainability credentials of this reduced role for the Western Vale, is provided, both in terms of the reduced requirement and its reduced role and function in relation to the redistribution of the Vale's unmet housing needs.

Land at Fernham Gate, Faringdon, provides an eminently suitable opportunity to accommodate a non-strategic development in a sustainable manner. Further information on the development proposals is provided within the accompanying Development Framework Document.

## Commitments

The Council appear to be relying on all existing commitments to be deliver, with no lapsed rate applied. In that regard we note the conclusions of the Report "**From Start to Finish: How quickly do large-scale housing sites deliver?**" (2016), where the research presented therein indicates that DCLG has identified a 30-40% gap between planning permissions for housing and housing sites, whilst 10-20% of

permissions do not materialise into a start at all. Consideration should be given to the introduction of a lapse rate, particularly given our concerns relating to the deliverability of the Part 2 Plan's sources of supply.

### **Windfall Development**

The Site Selection Topic Paper (October 2017) provides the evidence for the inclusion of a windfall allowance in the Part 2 Plan (para. 4.20-4.23 refers). The evidence looks back at delivery rates between 2011/12 to 2016/17 to conclude that a windfall allowance of between 70 and 100 dwellings should be provided.

Such a methodology is both flawed and unsound. The NPPF outlines that:

*“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends...”* (para 48 refers).

The Site Selection Topic Paper does not provide any assessment of whether windfall has consistently become available in the local area and will continue to become a reliable source of supply in the future.

We also acknowledge the significant amount of work the Vale of White Horse has undertaken in assessing the capacity of housing sites within the existing urban area through the HELAA process. In light of the significant amount of work undertaken to assess urban housing potential, it is unlikely that the level of windfall development envisaged will come forward.

If the Council can provide the necessary evidence, at the very least, windfall development should be removed from the first 3 years of the Plan as they are likely to already have permission and form part of the committed supply.

In any event, to provide certainty over meeting the Vale own housing needs and those unmet from Oxford City, a greater level of certainty could be provided by allocating additional sites in the Part 2 Plan, rather than relying on windfall development, which by its very nature, should be unknown and therefore uncertain.

We also note that there is a disproportional quantum of windfall provision made for the Western Vale area (nearly 10% compared to 5% for the Plan as a whole), with no explanation provided for the higher rate.

## **Development Management Matters**

### **Development Policy 2: Space Standards**

We support the principle of Development Policy 2 which seeks to secure a mix of dwelling types and sizes to meet the needs of current and future households. However, it is important to recognise that that needs could change over the plan period and therefore the policy should include sufficient flexibility to cater for changing circumstances. The requirements in the policy are present drawn from the various documents listed in para. 2.31 to 2.43 of the Topic Paper 3 (October 2017).

In 2013, the Government launched a review of the various housing standards being implemented by local authorities. This Review culminated in:

1. The establishment via Building Regulations of mandatory baseline standards that are to be applied on all new developments across the Country; and
2. A series of optional standards, including minimum internal space standards for new houses.

This Review culminated in the establishment via Building Regulations of mandatory baseline standards (Category M4(1)) that are to be applied on all new developments across the Country; and a series of optional standards relating to dwelling accessibility referred to as Category M4(2) and Category M4(3). In addition, optional minimum internal space standards for new houses were introduced – the nationally derived space standards (hereafter NDSS).

The Ministerial Statement accompanying the publication of the new 'Optional Standards', confirmed that the reason for publishing the standards was to rationalise the ***"...many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes."***

Our comments relating to the Council's proposals to introduce NDSS and the optional accessible housing requirements are provided below.

### Nationally Derived Space Standards

The NPPG sets out clear criteria which must be satisfied in order to adopt optional NDSSs over and above the requirements of Building Regulations. Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- viability – the impact of adopting the space standard should be considered as part of a plans' viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.

The guidance effectively sets out three stages which must be addressed to ensure the Optional Standards are only applied where needed and impacts are fully considered.

We do not believe that this level of assessment has been undertaken by the Council to underpin this policy. Certainly, we have not been able to identify anywhere in the Local Plan evidence base where this justification exists. On this basis, and until the level of justification required by the NPPG is available, these requirements must only be treated as indicative figure and not mandatory requirements.

### Category M4(2) and M4(3) Housing

The NPPG sets out clear criteria which must be satisfied in order for the optional enhanced standards to be used as part of Local Plan policy.

Para. 006 Ref ID: 56-006-20150327 requires:

***“The National Planning Policy Framework requires local planning authorities to have a clear understanding of housing needs in their area, including those for people with specific housing needs. The Framework provides guidance on the methodology that can be used to undertake the needs assessments.”***

In terms of the establishing a methodology for understanding the housing needs of an area, the 'housing and development needs' section of the NPPG indicates that this should form part of the SHMA process.

Para. 007 Ref ID: 56-007-20150327 outlines what evidence will be required by Local Planning Authorities to justify the higher accessible housing standards. It states that:

***“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:***

- ***the likely future need for housing for older and disabled people (including wheelchair user dwellings).***
- ***size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).***
- ***the accessibility and adaptability of existing housing stock.***
- ***how needs vary across different housing tenures.***
- ***the overall impact on viability.”***

In terms of the tests above, we note the Council's evidence base does not satisfy all the necessary criteria. Specially, we note that:

- The SHMA identifies a net total need of for accommodation for the elderly and people with disabilities of 2,571 dwellings. Assuming schemes are delivered in a policy compliant manner, the proposed policy framework would deliver over 10,000 category M4(2) compliant houses. This is around four times higher than evidence would suggest is necessary, before category M4(3) requirements are factored in;
- Not all people in need will seek to move to a new house and will look at opportunities to adapt existing housing stock. Typically, under 5% of all house moves are to new build properties;
- No evidence is provided as to how specialist accommodation outside of allocated sites will be used to contribute to the need for accessible and adaptable housing – indeed the existing and proposed supply has already been factored into the need as identified by the SHMA;
- No consideration has been provided as to the location of new dwellings. Some of the allocations proposed could be located in rural or semi-rural locations. We have identified two allocations in the Part 2 Plan that are dependent on higher order settlements for services and facilities and clearly these locations would not be practical for such housing;

- The evidence base does not look at the how existing housing stock could be adapted to meet needs – indeed new build transactions will only form a small percentage of the housing market, with the dominant role being played by the second-hand market;
- There is no basis for the tenure split in terms of accessible and adaptable housing proposed by the policy; and
- The conclusion that the additional policy burden will not worsen viability is highly disputed and conflicts with other viability assessments underpinning other similar policies in other Local Plans.

Consequently, Development Policy 2 cannot be considered as being positively prepared, justified or consistent with national policy.

### Recommended Alterations

This representation has highlighted a number of concerns relating to the Part 2 Plan Publication Version. In our opinion, as presently drafted, the emerging Plan is unsound. To remedy these issues, we proposed the following alterations:

1. The Part 2 Local Plan should only cover the matters defined for it in para. 1.1 and CP3 of the Part 1 Plan;
2. It should reflect the spatial strategy and distribution of development in proportionate terms outlined in the Part 1 Plan;
3. The redistribution of the Vale's unmet housing needs should be distributed in accordance with the spatial strategy outlined in the Part 1 Plan. This strategy has been tested at Independent Examination and found to be sound. As part of an Adopted Plan, it must be the most appropriate strategy when considered against reasonable alternatives;
4. The Western Vale's role in meeting the Authority's unmet needs, as well as Oxford's should be recognised. Consequently, there is a need for the Western Vale's requirement to be increased, together with the supply of housing;
5. There is too great a focus of development in the South East sub-area;
6. The Plan focuses too much growth at East Hanney and Kingston Bagpuize;
7. The Part 2 Plan should focus growth at non-strategic sites to provide a continuity of housing land supply over the short and longer term;
8. Flexibility should be included in the Plan to accommodate a higher apportionment figure from Oxford City, should it increase further;
9. The lead-in times and delivery rates of the strategic allocations should be reasonable, having regard to the quantum of planned development proposed in specific areas, including in neighbouring authorities;
10. The exceptional circumstances have not been sufficiently demonstrated to warrant the development of the Harwell Campus residential proposals in the AONB;
11. In line with Government evidence, at least a 10% non-implementation rate should be provided for all existing commitment;
12. The windfall provision has not been sufficiently evidenced and therefore should be removed at present; and
13. As written, Development Policy 2 cannot be considered as being positively prepared, justified or consistent with national policy.

Given the above, land at Fernham Gate, Faringdon, should be allocated in the next iteration of the Part 2 Plan.

**NM/16.118**

**November 2017**



# Land off Fernham Road, Faringdon Development Framework Document

Prepared by LRM Planning Limited on behalf of Taylor Wimpey

Update May 2017

Fig 1: The existing site access (A420 in background)





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# 1. Introduction

**This Development Framework Document (DFD) has been prepared on behalf of Taylor Wimpey in relation to land off Fernham Road, Faringdon.**

It sets out a strategy for the development of the site based on a detailed site analysis and context appraisal. It demonstrates how the site could contribute around 70 dwellings towards the future needs of the District. The site would be available immediately.

The strategy is based on detailed work undertaken by a consultant team in respect of transport, landscape, arboriculture, ecology, noise, air quality and drainage along with the feedback received from a recent public consultation. These have influenced and shaped the approach taken to the site in terms of design.



Fig 2: The existing site entrance



Fig 3: Faringdon Town Centre

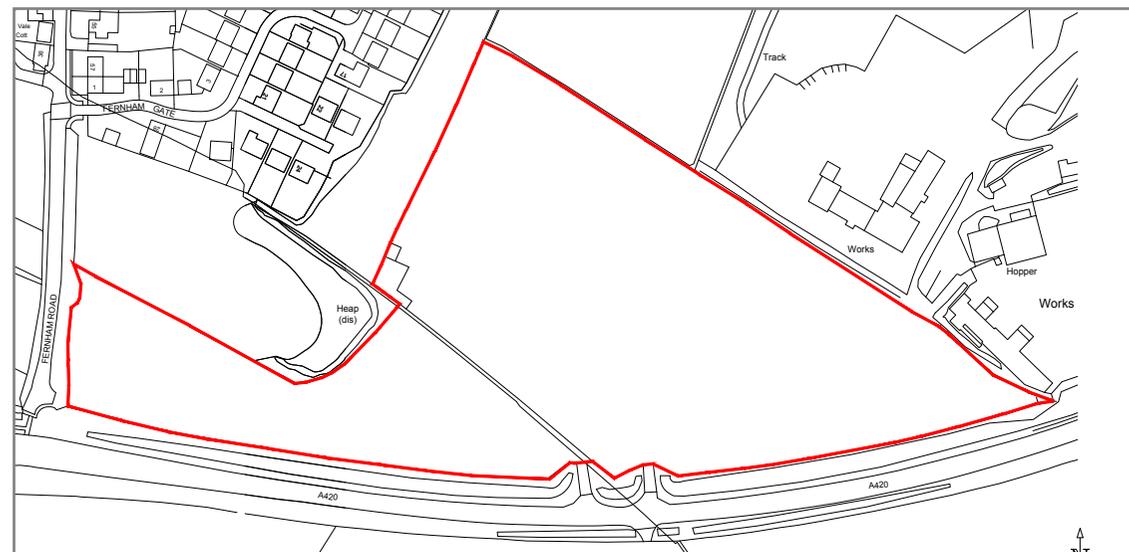


Fig 4: Site Location Plan



Fig 5: The site with adjoining existing and proposed development

Fig 6: The site looking eastwards from the A420



# 2

## The site and its context

This section sets out information in respect of the site and its context.

It describes the site and its key characteristics as well as the wider context of the site and elements that will help shape detailed design considerations. There is plainly significant development planned in the local area (figure 5) as such, this section sets out information in respect of that planned growth and how the subject site will integrate and form the “final” section of the extension of the settlement.

In addition it sets out an overview of the adopted Local Plan Part 1 policies and emerging Part 2 policies that will guide the future development of the subject site.



## Site Location

The site is identified at figure 4 and measures approximately 4.1 hectares. It is a broadly triangular parcel of land, which is presently in agricultural use.

The land is situated immediately adjacent to the established residential envelope of Faringdon. It is bound:

- to the west by Fernham Road. Beyond Fernham Road are two further areas of land subject to proposals for residential development totalling 450 dwellings (land off Coxwell Road);
- to the north by residential development and playing fields associated with Faringdon Community College. In addition there is an area of land (land off Fernham Road) which is subject to an application for residential development (10 Units);
- to the east by a garden stone retail outlet, that is subject to proposals as part of a wider area of land (further to the east) for 380 dwellings, employment land and premises, and associated use; and
- by the A420 to the south with countryside beyond.

The site's boundaries are generally defined by mature hedgerow planting to the north, hedgerow planting and fencing to the east and west and the A420 to the south. The Environment Agency Flood Zone Map confirms that the site lies within Flood Zone 1 (low risk) and as such it has an annual probability of river flooding of less than 0.1%. Environment Agency mapping also confirms that the site is not at risk from surface water flooding.

The site lies within the wider Wooded Estate lands landscape character type, which is a large area encompassing Faringdon and much of the landscape to the north-east, north-west and south. The site is separated from the more rural countryside to the south of Faringdon by the A420 and due to the presence of development on the western boundary along with the areas subject to various proposed developments.

## Accessibility

The site benefits from proximity to a number of local facilities, including the Community College and Leisure Centre, which are located immediately to the north of the subject site, as well as retail facilities located slightly further afield on Folly View Road. A

number of other key services and facilities are within 2km of the subject site and can be accessed on foot or by bicycle, including the Infant and Junior Schools, a supermarket and the town centre itself.

A number of bus services pass in close proximity to the site, offering services to a range of locations including Faringdon, Swindon and Oxford. Similarly, given the site's location and proximity to the existing urban fabric, it is considered to offer the potential for walking and cycling links to local services. The subject site is also well located to a number of key employment locations including to the north of the site, clustered around Park Road.

## Development Context

Notwithstanding the above, there are a number of applications in the surrounding environs, which are plainly important considerations (figure 5 & 7). These are:

- Land off Park Road, Faringdon (Ref: P13/V0709/O) - Outline application for residential development (up to 380 units including up to 64 extra care units), employment development, a primary school, allotments, public open space and associated



infrastructure with new access from Park Road. The application is not yet decided.

• Land adjoining Coxwell Road, Faringdon (P13/V0139/O) - Outline planning application for residential development of up to 200 houses, public open space, associated infrastructure and new access. Outline planning permission was granted on 14th January 2015. An application to reduce the affordable housing obligations was subsequently allowed on Appeal (ref: P15/V1323/MPO).

• The Steeds, Faringdon (P15/V1934/O) - The erection of up to 200 dwellings together with Green Infrastructure, surface water attenuation and a new access from Coxwell Road. The application has been approved.

• The Steeds, Faringdon (P13/V1102/O) - Erection of up to 250 dwellings; a Class A1 retail shop (about 420sq m); a public house (Class A4); Green Infrastructure including sports pitches; children's play area ; sustainable drainage system and other related infrastructure ; internal roads, footways and cycleways; 2 vehicular accesses from Coxwell Road and alterations to the junction of Coxwell Road /A420. The application has been approved.

• Land adjacent to Fernham Gate, Faringdon (P15/V0154/O) - Outline application for erection of 10 dwellings and associated parking and landscaping, new access onto Fernham Road. The application has been approved.



Fig 7: Adjoining development parcels



## Planning Policy Context

The Adopted Vale of White Horse Part 1 Local Plan 2031 sets out a number of key considerations.

The vision indicates:

*“By 2031 the Vale of White Horse will have thriving and prosperous communities that have benefited from economic growth”*

And that the main settlements will continue to form the focus for the District and:

*“..provide healthy and sustainable communities where everyone has a decent place to live and work with good access to leisure and community services and facilities.”*

Key objectives of the plan include the need to build healthy and sustainable communities by *interalia*:

- SO 1: Provide for a range of homes across the district to deliver choice and competition in the housing market and to meet the identified need, including for affordable housing;

- SO 2: Cater for existing and future residents’ needs including the needs of different groups in the community;

- SO 3: Direct growth to the most sustainable locations in the district, ensuring development is integrated with and respects the built and natural heritage and creates attractive places in which people will want to live, as well as being supported by a sufficient range of services and facilities.

Faringdon itself is identified as the focus for growth in the Western Vale sub region. It is considered to be:

*“a sustainable market town that acts as a service centre for a large rural catchment to the west of the Vale. It has an excellent range of services and facilities and further development, adjoining Faringdon, including within Great Coxwell parish, will help to support the delivery of improvements to the town.”*

There are a number of other relevant policies in the adopted plan that the proposals would conform with:

- Core Policy 22: Housing Mix – which seeks to ensure an appropriate housing mix;

- Core Policy 23: Housing Density – which seeks to ensure that residential dwellings are provided at an appropriate density;

- Core Policy 24: Affordable Housing – which sets out the Council’s requirement;

- Core Policy 33: Promoting Sustainable Transport and Accessibility – seeks to promote sustainable transport and accessibility including ensuring that the impacts upon local highways are minimised;

- Core Policy 35: Promoting Public Transport, Cycling and Walking – which seeks to support the provision of sustainable transport measures to promote the use of public transport, cycling and walking;

Core Policy 37: Design and Local Distinctiveness - seeks to encourage all new development to be of high quality design;

- Core Policy 39: The Historic Environment – which sets out the Council’s approach to conserving historic assets across the district;

- Core Policy 40: Sustainable Design and Construction – which sets out the requirement for



new development to incorporate climate change adaptation measures to ensure resilience to climate change;

- Core Policy 42: Flood Risk – which seeks to minimise risk of flooding in new development proposals;
- Core Policy 43: Natural Resources – which sets out the Council’s approach to minimising environmental impacts associated with development proposals
- Core Policy 44: Landscape – which sets out the Council’s approach to protecting the important landscape setting of the Vale. In this regard the site is located within the North Vale Corallian Ridge;
- Core Policy 45: Green Infrastructure – which seeks to ensure an increase in provision of Green Infrastructure through new development; and
- Core Policy 46: Conservation and Improvement of Biodiversity – which seeks to protect and enhance biodiversity across the district.

Within the emerging Local Plan part 2 there are a number of relevant policies that proposals would also comply with in detailed design, these include:

- Development Policy 1: Space Standards;
- Development Policy 15: Access;
- Development Policy 19: Public Art;
- Development Policy 20: External Lighting;
- Development Policy 22: Impact of Development on Amenity;
- Development Policy 23: Effect of Neighbouring or Previous Uses on New Developments;
- Development Policy 27: Waste Collection and Recycling;
- Development Policy 28: Settlement Character and Gaps;
- Development Policy 32: Open Space; and
- Development Policy 33: Leisure and Sports Facilities.

## The Site

An analysis of the site has been undertaken in order to shape the proposals. Figures 8 to 13 show numerous views of the site, its boundaries and existing adjoining uses.

Importantly, both to the east and west of the site significant new developments are planned which will impact upon its context and the views.



Fig 8: view of the site with development adjoining



Fig 9: the site access off Fernham Road



Fig 10: western section of the site adjacent to residential proposal



Fig 12: the site



Fig 11: main road along side the site



Fig 13: existing development adjacent to the site proposed for redevelopment

## Built Context

In order to help inform future proposals and to shape the detailed design, an analysis of the local built context has been undertaken.

The local built environment was established around the historic core of Faringdon with a range of historic streets and buildings. More recently development has spread outwards and includes a range of more modern approaches to development.



Fig 14: Town square



Fig 15: the town centre



Fig 16: historic street in the town centre



Fig 17: more recent development at Fernham Gate to the north of the site



Fig 18: The leisure centre to the north of the site



Fig 19: local bus stop



Fig 20: more recent residential development

## Key Considerations

Based on an analysis of the site's location and the emerging policy context, there are a number of key considerations that feed into the proposals:

- Providing much needed new homes including a proportion of affordable homes and a variety of house types to support the creation of an inclusive community;
  - Good proximity to nearby schools, shops, healthcare and leisure facilities, which are easily accessible by sustainable transport modes;
  - Sympathetic design of the site boundary to address the landscape setting to Faringdon;
  - Close proximity to existing pedestrian and cycle links;
  - Provision of a new valuable public open space that is easily accessible by existing and future residents;
  - Creation of new green corridors and habitats across the site to connect on-site features to the wider green network, and to enhance biodiversity;
- Integration of valuable on-site hedgerows and trees into the design of the development and wider development framework;
  - Implement the emerging key design principles of the adopted Local Plan;
  - Orientate dwellings to maximise solar gain and avoiding a uniform setting edge; and
  - Integration with adjoining development parcels.

# 3 Proposals

## Design Principles

The design principles for the scheme are:

- To create an exemplar development that encourages sustainable living and lifestyle;
- Provide a high quality residential environment that efficiently uses land;
- Provide a clearly defined and safe pedestrian/ cycle routes that promotes permeability;
- Retain valuable natural assets within the existing landscape framework;
- Where ground conditions allow, utilise sustainable drainage solutions;
- Promote a clear street hierarchy;
- Create distinct character areas with a strong sense of identity; and
- integrate with other new developments planned to the south of the town, to create a legible edge to the settlement.

This section presents a potential option for the future development of the site. It provides design principles based on the site analysis undertaken and illustrative proposals that demonstrate the suitability of the site to accommodate around 70 dwellings.

An illustrative master plan has been prepared by Life Space Design. This is shown opposite (fig. 21) and includes:

- c.70 dwellings including provision for affordable housing;
- Provision of public open space;
- Provide a visual buffer to the A420;
- Potential to provide further wildlife habitat within the open space;
- Vehicular access and pedestrian / cycle links; and
- The strengthening of boundary treatments.



Fig 21: Illustrative master plan



## Compliance with Adopted Plan

A number of key policies were identified in section 2, it is considered that the proposals will comply with the aims of these. Of note:

- In line with Core Policy 22 it provides parameters that ensure an appropriate housing mix to meet needs can be provided;
- As required by Core Policy 23 an appropriate density is proposed;
- Subject to viability, a policy compliant level of affordable housing will be provided as set out by Core Policy 24;
- The proposals allow for a sustainable transport and accessibility strategy which integrates with the existing infrastructure, as set out by Core Policy 33 and walking and cycling will be promoted in line with Core Policy 25;
- Core Policy 37 sets a number of design requirements –the proposals allow for an appropriate framework that will be supplemented by detailed design;
- The scheme allows for sustainable design and construction in accordance with Core Policy 40;
- There will be no risk of flooding as set out in Core Policy 43;
- The impacts of the proposals will be minimised as required by Core Policy 43;
- Core Policy 44 seeks to minimise impacts upon the landscape, technical work undertaken confirms that proposals will ensure that this is the case;
- Core Policy 45 seeks a net gain in green infrastructure accordingly, the scheme provides an additional 1.14ha of public open space; and
- The scheme will provide a modest biodiversity gain in accordance with Core Policy 46.





Fig 23: examples of the potential Taylor Wimpey approach to detailed design from elsewhere;

## 4. Technical Considerations

**A suite of technical work has been undertaken. This section sets out a summary of the main findings and how they have been incorporated into initial design proposals as well as future considerations for the detailed design stage.**

### Arboriculture

Local environmental planning consultancy, EDP, has undertaken a tree survey on the site and this identifies the location of trees and their rooting zones. This has shaped the illustrative layout.

The survey has identified 13 Category B trees (rated as being moderate quality and amenity), including a group of semi-mature maples on the western boundary. These are retained.

Five other trees assessed as either Category C (low quality and value) or Category U (recommended for removal) will be removed.

The proposals will mitigate the loss of any lower-quality trees through the provision of new planting.

### Ecology

An Extended Phase 1 Habitats Survey of the site has been undertaken by EDP. This included a combined visual assessment for roosting bats and a visual survey for badgers. Additional surveys have been undertaken following regular consultation with the Council's Ecology Officer.

A desk-study review has found that the site is not covered by statutory designations, although at a local level, it does lie within the West Oxfordshire Heights Conservation Area. There are four Sites of Special Scientific Interest within 5km of the site. Due to the considerable distance between these designations, development of the site would not result in any direct or indirect adverse impacts on the nature conservation interest of these sites.

The site does lie in proximity to one SSSI (the Wicklesham and Coxwell Pits SSSI). However, the designation lies outside the application site. The MAGIC website confirms that the SSSI status seeks to preserve earth heritage features (pit exposures). It terms of ecology, EDP do not consider that it will

be impacted upon. In terms of the geological interest, the development of the subject site, will not change the ability to preserve the geological features in situ. Furthermore, the proposed development would have a no greater impact on the SSSI than Land adjacent to Fernham Gate.

The result of the field survey found that:

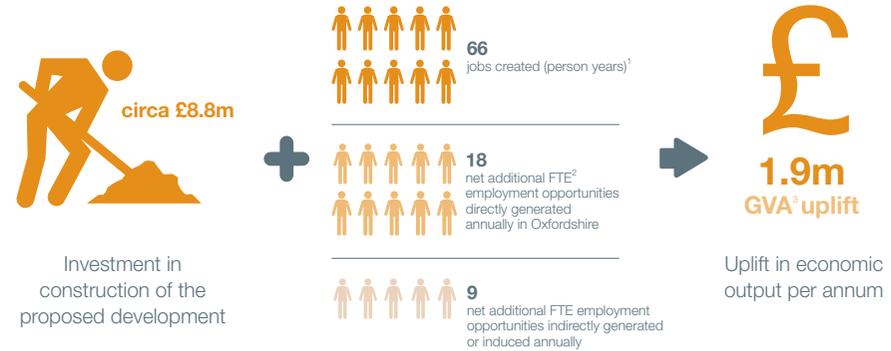
- The field margins of the site are predominantly fence lines with encroaching scrub and trees and a defunct hedgerow between two fields;
- The site comprises a mixture of improved grassland, which has not been closely grazed and species-poor, semi-improved grassland that has been closely grazed;
- A sward of Calcareous grassland was identified within the south-eastern portion of the site;
- No bats or evidence of bats were found within the sheds or the trees within the site;
- Field surveys have identified reptile habitat along some of the boundaries of the site. Accordingly, the applicant has progressed reptile surveys and these are ongoing, although no reptiles have been found to date.



### Economic Impact Statement

Site: Fernham Road, Faringdon  
 Proposed Development: 70 residential dwellings

#### Construction Phase



#### Operational Phase

“ **83 working age** economically active and employed residents estimated to **live on the new development** ”



Uplift in gross annual income of over **£2.4 million** from new employed residents



**£660,000** New Homes Bonus to Vale of White Horse District Council and **£165,000** to Oxfordshire County Council



**£110,000** increase in Council Tax revenue annually to Vale of White Horse District Council

Due to the site’s agricultural use for grazing, an opportunity exists to provide modest biodiversity gain by allowing less frequent mowing and management of grassland in the future to increase species diversity. A modest quantum and quality of informal natural greenspace within the proposed development is provided, in addition to bolstering the green network of peripheral hedgerow/trees with supplementary planting. In addition, measures can be taken to retain the existing calcareous grassland seedbank, establishing it within new and existing retained open space and ensuring links to off-site habitats persist.

### Economic Impact

Figure 24 sets out the potential benefits from the scheme.

Fig 24: potential economic benefit;

## Landscape

**Landscape Character:** A detailed review and comparison has been carried out by EDP on the Council's landscape character assessments and their relation with the actual characteristics of the site and its local context. This has been complemented by a field appraisal carried out by an experienced Chartered Landscape Architect.

The site lies within the wider Wooded Estatelands landscape character type, which is defined as a large area encompassing Faringdon and much of the landscape to the north-east and north-west, and continues southwards of the site which follows the underlying geology of the greensand ridge.

The definition of the Wooded Estatelands refers to several key characteristics, including a well-wooded appearance. However during a field survey in spring 2016, it was found that the site bears only a limited representation of these features, these being:

- a) that the site is part of the underlying rolling topography; and
- b) there is some partial enclosure of field boundaries by native hedgerows.

There is some representation of the landscape structure of the wooded Estatelands elsewhere in Faringdon, such as to the west of the site. However, within the site this is weaker and would benefit from strengthening.

Topography has a bearing on the degree to which the landscape is valued, as confirmed by the Local Plan policy NE7 (North Vale Corallian Ridge) which encompasses the area in which the site lies; as it does for all of Faringdon. A topographical analysis of the landscape (figure 25) has demonstrated that the site is neither at the highest or lowest parts of the ridgeline. It is also the case that the town occupies land both on the upper, elevated parts of the ridge, as well as the lower parts.

The perceptual and sensory qualities of the site do much to set it apart from the more rural countryside to the south of the settlement, due to the considerably reduced sense of tranquillity and remoteness in the vicinity of the A420. This is a primary urbanising feature, carrying traffic directly past the site and exerting a considerable detracting influence on the setting to the settlement. The presence of development on the western boundary of the site contributes to this considerably reduced sense of

separation when compared to the spur of high ground south of the A420.

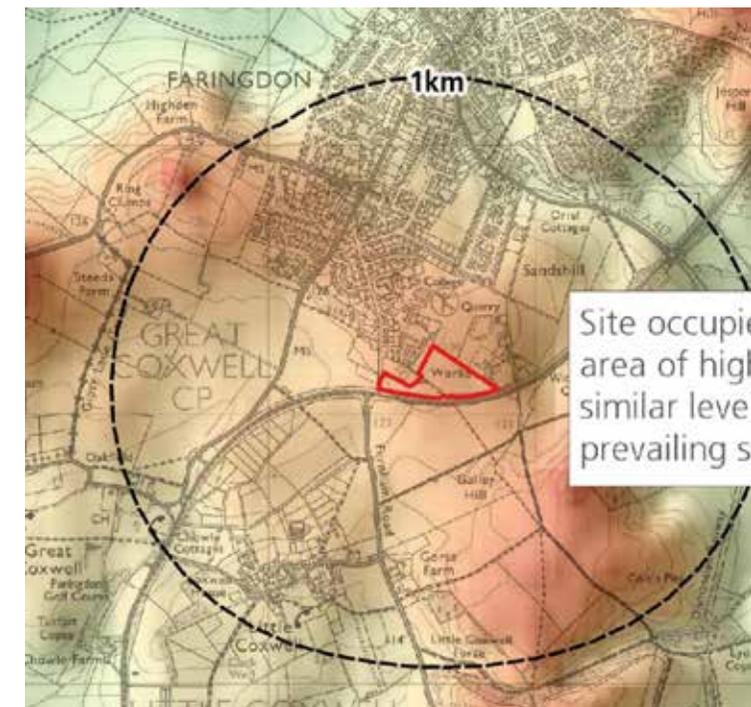


Fig 25: topographical analysis

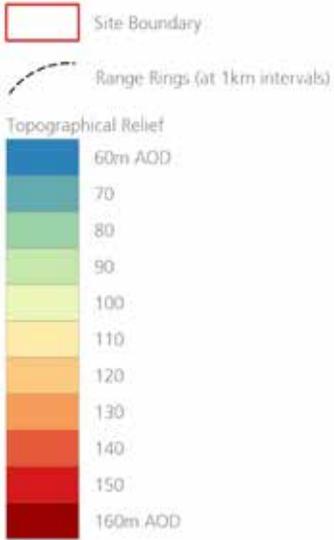
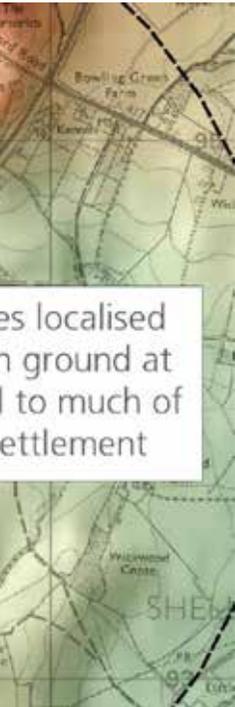


Fig 26: A420 to the south of the site

**Visual Amenity:** The visual amenity in the area is interlinked with the proximity of the A420, the quarries and the site itself. All of these features have a distinct effect on the quality of views available from public rights of way, roads and local viewpoints surrounding the site. Despite the site's location on elevated ground, the presence of the existing settlement and mature trees create some visual enclosure.

EDP have informed the Council of proposed representative photoviewpoints. Subsequently during the site survey it was found that views towards the site are therefore limited primarily to those obtained from the A420 and a limited number of PROW to the south of the site and along its boundaries. Further afield, the site is either at such a distance that it cannot be easily perceived (Badbury Hill) or physically separated by mature trees, as seen from Jespers Hill and Folly Hill.

**Landscape and Visual Mitigation:** Development of the site will respond to the site's location in relation to its topographical context and its position between the A420 and the existing settlement edge, these being factors that interlink with the Council's policies

relating to the North Corallian Ridge and the Urban Fringes and Countryside Gaps. The illustrative landscape masterplan (figure 27) demonstrates in terms of landscape strategy that:

- considerable open space buffer can be retained between the site and the A420;
- a new, substantial belt of tree planting would extend the well-wooded edge to the town as characterised to the west and east;
- new tree planting throughout the layout would create a softer, coherent extension to the existing settlement character; and
- the layout could integrate with proposed schemes to the east and west to provide permeability for residents within an attractive urban fringe.

Figure 28 (over) demonstrates the appearance of the site from the A420 with buffer planting after 15 years. Plainly the built element of the site will be well hidden by proposed planting.



Consented residential scheme: Land Adjacent to Fernham Gate.

Existing trees are retained and brought under long term arboricultural management. Additional trees to be planted along the boundary without impacting on long-term natural light levels of adjacent off-site dwellings.

Existing hedgerow to be planted and extended along full length of boundary. Additional native tree planting to augment the hedgerow and extend canopy cover as a green corridor to off-site features.



Site Boundary

**Existing Vegetation**

Trees/Hedgerow Removed

Trees/Hedgerow Retained

Calcareous Grassland to be retained where possible

**Proposals**

Specimen Trees  
Native species to be planted individually or in small groups

Tree Buffer  
Comprising locally appropriate native species including field maple, oak, lime, hazel and hawthorn. Tree buffer features a core belt of advanced growth selected standards

Hedgerow  
Hedgerow to proposed dwellings to include native species and those appropriate to the area

Amenity Grass  
To be seeded within areas of public open space and amenity areas. Front and rear gardens to be seeded or turfed

Meadow Grassland  
Existing grass sward retained and managed with rotational mowing to achieve species diversity and softer, naturalistic appearance

Bulb Drifts  
Provides seasonal interest and additional pollen source

Development layout  
Featuring small to medium specimen and street trees such as *Acer Campestre* 'Elsrijk', *Sorbus Acuparia*, *Malus* 'John Downie' and *Pyrus calleryana* 'Chanticleer'

Predicted Shading from Tree Buffer\*

Low-level Shrub Planting with Scattered Trees

Longer term management of tree buffer to create a naturalistic appearance with some thinning to allow for future tree growth and control of shading

Green corridor to allow movement of wildlife, namely badger and common lizard

**Notes**

For hard landscape details, refer to architect's drawings.

For tree protection, refer to the arboricultural drawings and Tree Constraints Plan.

Full specification, management and maintenance to be agreed.

client

**Taylor Wimpey (UK) Ltd**

project title

**Land off Fernham Road, Faringdon**

drawing title

**Plan EDP L7: Illustrative Landscape Masterplan**

date 03 MAY 2017  
drawing number EDP2924/17d  
scale Refer to scale bar

drawn by JTF  
checked MJ  
QA

**DRAFT**



info@edp-uk.co.uk www.edp-uk.co.uk  
Cloucester 01285 740427 Cardiff 029 21671900 Shrewsbury 01939 211190

Boundary habitat retained for common lizard and linked with a cohesive green corridor.

**\*SHADE ANALYSIS**  
Shade analysis has been based on a tree belt comprising three staggered rows, 2.5m apart with a core mix of native broadleaf trees at 2.5m centres. Shading correlates with predicted shading from trees having reached an average of 10m which is 15 years after planting accounting for the core mix (*Acer campestre*, *Tilia cordata*, *Quercus robur*) being established as selected standards. Selected thinning and long term management will ensure tree canopies can continue to grow, without creating excessive shading.

Under recommendations from Windrush Ecology, annex sett temporarily closed (if active) under license during works to the consented adjacent scheme. After this temporary closure, the sett will remain available for use by badgers in the long term and linked with a cohesive green corridor.

Low level shrubs to create an attractive boundary to the A420 without impacting on local views across the southern fringe of the site.

Tree buffer to reduce visual impact of proposed development in views from the A420 and nearby PRoW.

Informal mown grass paths pass through meadow grassland that incorporates retained calcareous grassland habitat.





Fig 28: the site with buffer planting

## Flooding

The Environment Agency Flood Zone Map confirms that the site lies within Flood Zone 1 (low risk) and as such it has an annual probability of river flooding of less than 0.1%. In accordance with National Planning Policy Framework guidance residential development is appropriate within this flood zone.

Environment Agency mapping also confirms that the site is not at risk from surface water flooding.

There is no record of historical flooding at the site in the South Oxfordshire & Vale of White Horse Strategic Flood Risk Assessment.

## Surface water drainage

Surface Water runoff from roofs, roads and parking areas will be disposed of in an environmentally sensitive manner using Sustainable Urban Drainage Systems (SUDS). Recent Site Investigation works confirm that the local soils comprise freely draining sands and gravels, therefore infiltration based SUDS, such as infiltration basins, soakaways and permeable pavements, will be utilised across the site. This will allow disposal of runoff at source, without impact upon sewers or watercourses, thereby ensuring that

the proposals do not increase flood risk to the locality.

All SUDS have been designed to accommodate runoff from extreme storms, including an allowance for predicted increases in rainfall caused by climate change.

SUDS also provide water quality treatment which will protect groundwater resources from any pollutants which may be present in drainage from highways and parking areas.

The SUDS within public areas will be offered for adoption by Oxfordshire County Council.

## Foul sewerage

Foul water will be pumped from the site to the existing Thames Water foul sewer in Fernham Road, via a pumping station to be located on the western edge of the development.

Thames Water confirm that improvements to the local sewage treatment works are due to be completed during O17 and will not therefore affect the proposed development.

Connection is also subject to ongoing discussion with Thames Water to ensure there is no detrimental effect upon the existing sewer network between the development site and the sewage treatment works. Any sewer upgrades required will be undertaken as part of the development proposals.

The pumping station and foul sewers will be offered for adoption by Thames Water.

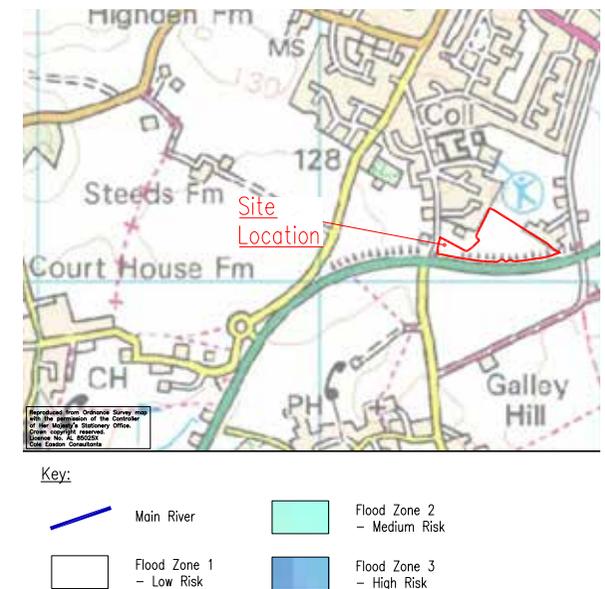


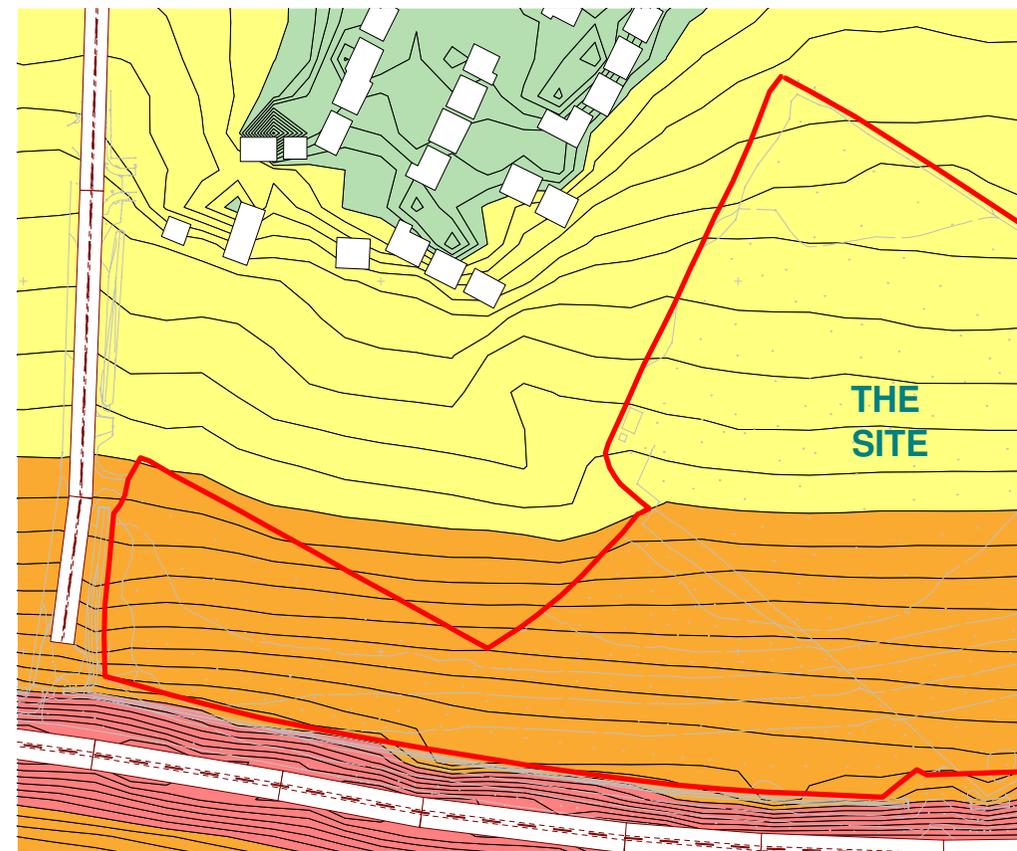
Fig 29: EA Flood Maps

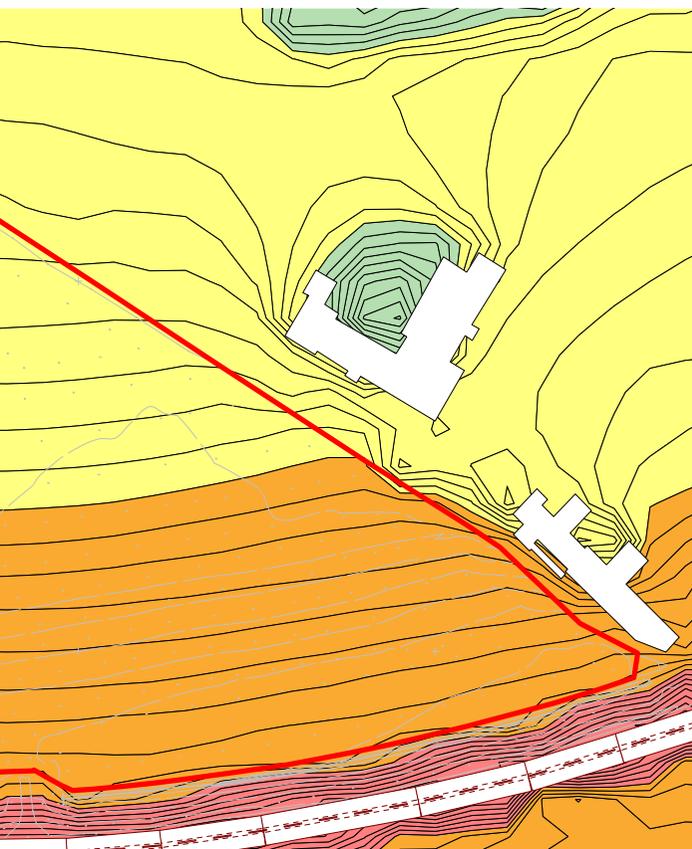
## Noise

Noise modelling has been undertaken based on verified noise survey results which correlate very well with traffic flow data from the DfT website. The findings of the noise modelling exercise have been used to feed into the scheme design to ensure that through standard noise control practices, acceptable levels of amenity will be achieved for future residents throughout the site in line with the guidance provided within BS 8233:2014.

The design measures considered include having a buffer zone from the A420, screening around garden boundaries and the consideration of building positioning within the site. A glazing and mitigation strategy in compliance with Building Regulations, with specifications that are achievable and are not onerous, will be incorporated into the building design to ensure the internal noise criteria will be achieved.

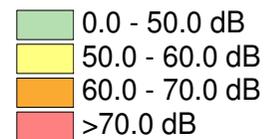
Fig 30: Existing daytime noise contour plan





Key:

Site Boundary: 



Contour Plot Presented For  
Indicative Purposes Only

Scale : Not to scale

## Air quality

WYG have also undertaken an Air Quality Assessment. They confirm that there will be negligible impacts upon air quality impacts as a result of the development. Indeed, the predicted emission levels are all below the air quality standards, objectives or related criteria for the protection of human health and for the protection of vegetation and ecosystems.

## Archaeology

An historic environment desk based assessment is currently being undertaken by archaeological consultants, and results so far show no known archaeological features within the site.

However, the range of archaeological sites within the surrounding landscape suggest there is moderate potential for buried remains to be found within the site. Buried remains are most likely to consist of infilled ditches or pits related to Iron Age, or Romano- British agricultural activity. There is also moderate potential for stray finds from late prehistoric periods, such as worked flints.

In consultation with the Council, a programme of trial trenching will be undertaken to fully understand the significance of the archaeology within the site.

## Accessibility

The site benefits from proximity to a number of local facilities, including the nearby community college and leisure centre and the Costcutter slightly further afield on Folly View Road. Other local destinations are all within 2km and can be accessed on foot or by bicycle, including the infant and junior schools, Tesco foodstore, and the town centre shops and facilities.

Bus services are available from Coxwell Road, including the Stagecoach 66 service between Swindon and Oxford, which offers a typical 20-minute frequency service. It is also noted that Stagecoach are supportive of growth on the A420 which will help the efficiency of local public transport services.

## Access

Cole Easdon have liaised with the Local Highway Authority, Oxfordshire County Council (OCC), about the appropriate form of access to the site.

Figure 31 shows the agreed access strategy, which comprises a logical extension of Fernham Road into the site. A separate footway connection is proposed

near the northwestern corner of the site to make walking to local destinations as convenient as possible for new residents.

From here, a new footway is proposed along the eastern side of Fernham Road to connect with the existing infrastructure. Vehicle swept path analysis has been undertaken to make sure that a refuse lorry can pass a car. The existing access to the A420 for pedestrians and cyclists will be maintained.

## Traffic impact

The number of car movements (vehicle trip generation) that the development will generate has been determined using the same methodology as that recently agreed with OCC for The Steeds (land to the west of Coxwell Road) application.

Using this methodology, the proposed development could be expected to generate some 33 to 41 vehicle movements (in or out) during the morning and evening peak hour periods respectively. Independent traffic surveys have been completed to allow vehicular capacity analysis to be undertaken at the Fernham Road / Coxwell Road priority junction. The analysis

confirms that there will be a negligible impact on queuing and delay at this junction as a result of the development proposal. This information will be presented in the Transport Assessment that will accompany any future planning application.

The Transport Assessment builds on the Cumulative Traffic Assessment already undertaken for the other proposed developments in the vicinity (including Fernham Fields & The Steeds), by considering the vehicular impact at junctions further afield from the site. The Transport Assessment establishes that the impact of this proposal in terms of additional vehicle movements at the Coxwell Road / B4019 Highworth Road / B4019 priority junction will be less than 1.5%. At the A420/Coxwell Road priority junction this impact in terms of vehicle numbers is less than 1.2%. As such, the impact is negligible.

## Conclusion

Based on the technical work undertaken (ecology, arboriculture, landscape, noise, air quality, hydrology, archaeology, transport), there are no constraints in principle to the development of the site. Rather the background work has helped shape proposals which can take account of relevant considerations.

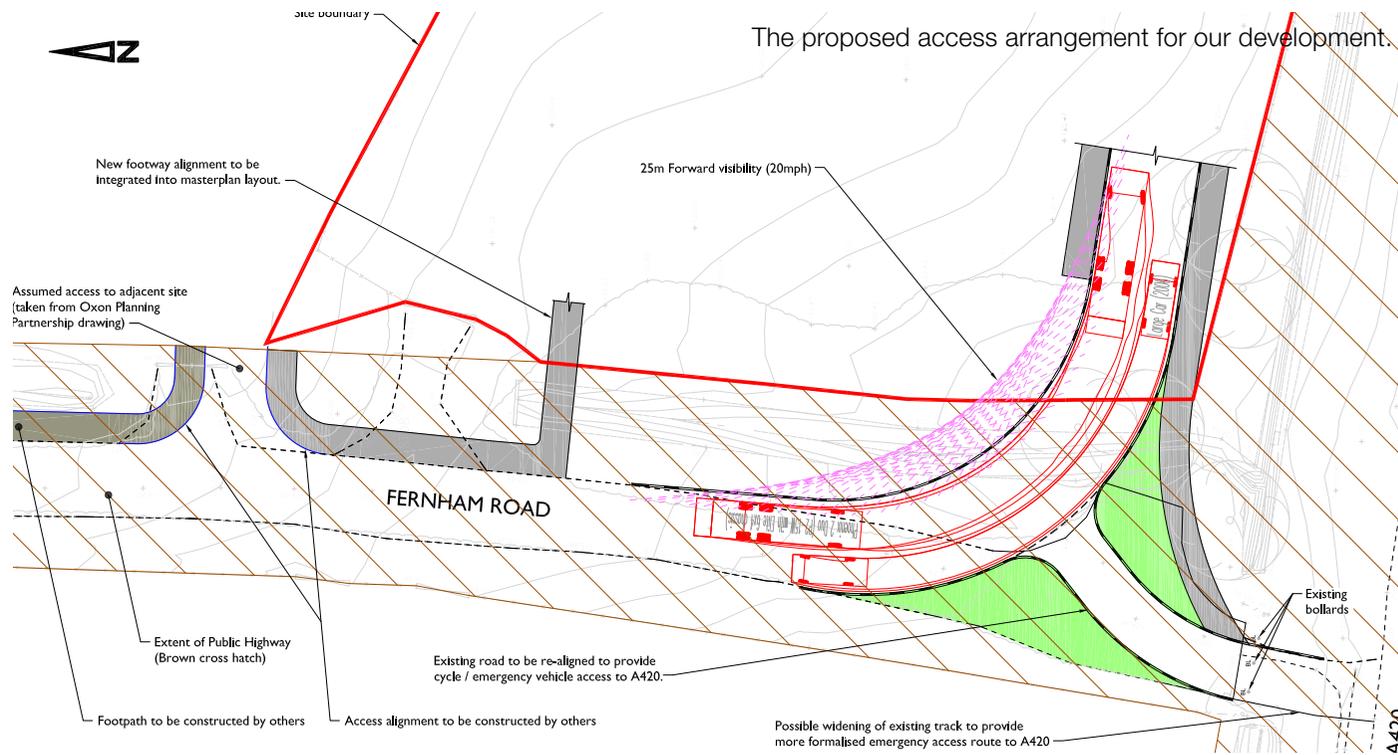


Fig 31: agreed access arrangement

# 5. Public Consultation

A Public Consultation was held at the Corn Exchange in Faringdon on Thursday 19th May 2016 and was attended by 104 people. Comments were invited for a further two weeks after the event (by post / email).

A full report of the findings is being prepared, however, for ease this section sets out an over view of the main findings.

- 46% of consultees believe there is a requirement for new homes in Faringdon while 46% think that no new housing is needed in the area;
- Starter homes (37%) and family homes (34%) are the most popular choices among those who identify a need for new housing;
- 94% are of the view that existing local facilities and services are not adequately equipped to support the proposed development, with schools (63%), healthcare (49%) and leisure/recreation (29%) identified as most in need of improvement;

**Taylor Wimpey**

About Taylor Wimpey

## Information about our company, who we are and what we do



Taylor Wimpey was formed by the merger of George Wimpey and Taylor Woodrow in 2007. We are able to draw upon experience and best practice gathered over a history dating back to the 19th Century. Today we are one of the largest homebuilders in the UK, completing over 12,000 homes each year.

**Planning sustainable communities**  
We want our developments to be environmentally, socially and economically sustainable. We understand the importance of stimulating strong, vibrant and healthy communities while protecting and improving the natural, built and historic environment.

**More than building homes**  
We build roads and junctions, sewers and utilities that link our developments with the surrounding areas. Where needed we provide community facilities such as schools, doctor's surgeries, shops and offices, bus stops and even railway stations, as well as much needed affordable homes. Such provision can help meet the day-to-day needs of the people living on, or near, our developments.

**Green spaces**  
We design landscaping and open space to provide an attractive and safe setting for homes, recreational space for residents, and habitats for plants and wildlife. Green spaces could include tree or hedgerow planting, playgrounds or sports pitches.

**Energy efficient homes**  
We look to reduce the energy demand of our homes by improving wall and roof insulation. In some cases we may also fit more complex technologies. This means that residents benefit from energy bill savings while their long term maintenance burden and costs are kept to a minimum.



**Engaging with local people**  
We are committed to working with local people, community groups and local authorities during the planning phase and aim to keep them up to date with our activities and progress during construction. We aim to plan and design developments that balance the demands of our business with providing for the needs of our residents and their communities.

For more information, visit:  
[taylorwimpey.co.uk](http://taylorwimpey.co.uk)

*"Our aim is to be the nation's leading residential developer for creating value and delivering quality. We are passionate about working with local people, businesses, local authorities and our customers to build aspirational homes".*



## Taylor Wimpey lays the foundations for thriving communities

We completed 13,341 homes in 2015, of which 19% were affordable homes.

In 2015, through planning obligations, we invested £335m in the areas in which we built.

We provide public transport, road improvements and education facilities on many developments.

Landscaping and open space, including play areas and sports pitches, provide the structure to many of our developments.

Fig 32: Exhibition Boards

- The most common aspirations for the design of the new homes are to ensure they are in keeping with the character of the local area (29%) and for the buildings to incorporate Cotswold stone (26%);
- Children's play areas (43%) and informal green spaces/parkland (23%) are the most popular choices for potential uses of public open spaces within the development; and
- The most common concerns about the proposed development relate to traffic/highways impact (66%), local facilities and infrastructure (29%) and noise/pollution (29%).

The findings are reflected in the proposed master plan and mitigation measures proposed, with detailed considerations at the detailed planning stage.



Fig 33: the exhibition

## 6. HELAA Form

The Vale of White Horse District Council have requested that site submissions include specific information in respect of submission sites. This is set out in this section and where further information is included.

Site address	Land off Fernham Road, Faringdon.
Current use(s)	Agricultural Use.
Previous/historic use(s)	Agricultural Use.
Site area (hectares)	c.4.1ha
Relevant planning history	<p>None associated with the site. However, there are 5 sites in close proximity of the site that have the benefit of planning permission for residential uses. These are:</p> <ul style="list-style-type: none"> <li>• Land off Park Road;</li> <li>• Land adjoining Coxwell Road;</li> <li>• Two applications at The Steeds; and</li> <li>• Land adjacent to Fernham Gate.</li> </ul> <p>Details are provided in Section 2 of this submission.</p>
Is the site in single ownership?	The site is subject of an option agreement by Taylor Wimpey.
Other interests in land (e.g. tenancies) – please specify	An existing agricultural tenant (grazing)
If you are not the owner, are the owners aware of submissions on this site?	Yes.



## DEVELOPMENT CONSTRAINTS

Does the site have immediate access to an adopted highway?	Yes.
Are you aware of any potential ground contamination issues on the site?	None known.
Are there any legal or ownership issues that may prevent development?	None known. Taylor Wimpey fully control the site.
Are you aware of any other constraints that may affect development on the site?	The technical information undertaken on the site in respect of arboriculture, ecology, landscape, flood risk and drainage, foul water, noise, air quality, archaeology and highways would demonstrate that the development proposals are deliverable. Further detail is provided in Section 4 of this Development Framework Document.
Are you aware of any constraints which would restrict the site's ability to deliver policies contained in Local Plan 2031 Part 1?  (e.g. 35% affordable housing; density; etc)	No. An analysis of the development proposals against the Development Plan policy is provided in Section 2 of the Development Framework Document.
Have any surveys been carried out on the site?	<p>Yes. The following surveys have been undertaken:</p> <ul style="list-style-type: none"> <li>• Arboriculture;</li> <li>• Ecology;</li> <li>• Landscape Character &amp; Visual Amenity;</li> <li>• Flood Risk and Drainage;</li> <li>• Foul Water;</li> <li>• Noise;</li> <li>• Air Quality;</li> <li>• Archaeology; and</li> <li>• Highways.</li> </ul> <p>In addition, Taylor Wimpey also held an initial public consultation on their development proposals.</p> <p>Further detail of the findings of this work is provided in Section 4 of this Development Framework Document.</p>



### AVAILABILITY

**Do you/the landowner intend to sell the land if it is allocated in Local Plan 2031 Part 1 or subsequent development plans?**

The landowner is contractually bound to sell the site to Taylor Wimpey if the site is brought forward for residential development.

### DELIVERABILITY

**When do you anticipate that the site could become available for development?**

1-5 years. The site is in a single landownership and Taylor Wimpey have undertaken a substantial amount of work to demonstrate that the site is entirely deliverable. An application could be submitted at short notice, if supported by the Local Planning Authority.



**PREFERRED USES TO BE ASSESSED (tick as appropriate)**

**Housing**

✓

Includes typical dwelling houses, residential care homes, nursing homes, boarding schools, residential colleges, and houses in multiple occupation

**Gypsy, Traveller and Travelling Showpeople (GTTS)**

×

The site will be assessed for suitability for GTTS temporary and permanent pitches

**Economic**

×

Tick here for your land to be assessed for all forms of economic development

- **Employment uses**  
(office, manufacturing and warehousing)
- **Retail uses**  
(shops, cafés, bars, restaurants, etc)
- **Hotel**  
(hotel and other related uses, including boarding and guest houses)

×

×

**Other Uses**

×

If you would like to have your site assessed for any other use not specified above (examples include community buildings, open space, cemetery, park and ride facilities), then please add these here:

**LAND FOR CUSTOM AND SELF-BUILD HOMES:**

Are you interested in having some, or all of your site considered for the provision of custom and self-build homes?

Yes	
No	✓





# 7. Conclusion

**This Development Framework Document has been prepared on behalf of Taylor Wimpey Homes in relation to land off Fernham Road at Faringdon.**

The Framework confirms the suitability of the site for residential development in the context of the significant expansion to the south of the town surrounding the site.

A significant amount of detailed work has been undertaken. This document summarises that information and it is expected that the full suite of information will be submitted to the Council.

Based on this, the site could contribute 70 dwellings in the short term.

# LRM



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