

JPPC ref: DB/5864

Planning Policy  
South Oxfordshire District Council  
SENT VIA E-MAIL

11<sup>th</sup> February 2019

Dear Sirs

**South Oxfordshire Local Plan 2011-2034- Final Publication version  
2<sup>nd</sup>- January 2019  
Consultation closing 18<sup>th</sup> February 2019**

Thank you for the opportunity to comment on your Local 2011-2034 publication version. We write to make comments on behalf of our client Lincoln College who own land in Forest Hill. A plan identifying the site is included with this submission.

*Distribution strategy*

We are pleased the Council has acknowledged the potential of smaller settlements to contribute to the district housing supply, and the necessity for new homes if the vitality of rural areas is to be maintained. The inclusion of objectives to support the vitality of villages (OBJ 1.1), the way of life of rural communities (OBJ 1.2), and to deliver a range of housing options (OBJ 2.1) is laudable and can serve to preserve and enhance rural communities.

While we welcome the Plan's aspirations we are concerned that the plan does not include a robust policy to realise its objective for sustainable growth in rural housing. The absence of clear and robust policy means the Plan is ineffective with regard to its aspirations for rural areas and thus unsound within the meaning of paragraph 35 of the National Planning Policy Framework.

The proposed Plan seeks to build upon the existing network of settlements, essentially continuing the spatial strategy pursued in the present Core Strategy. Smaller villages have an integral role in the network. With significant growth planned in the towns and larger villages it is imperative development is facilitated in smaller settlements to achieve the objectives in the Plan and avoid an unsustainable balance in the District.

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The current Core Strategy allows for infill opportunities, however this has led to a limited supply of new homes. The emerging Local Plan needs to find provision over and above Core Strategy levels and as such requires policies which will encourage and allow additional housing growth.

Previous versions of the proposed Plan included a requirement that each smaller settlement contributed to meeting housing need. Previous draft policy H8 imposed a requirement on neighbourhood plans in smaller villages to provide for a 5% increase in housing, or where no neighbourhood plan was progressed a commitment by the Council to support development of infill or other suitable sites to provide a 5%-10% increase in housing in that village.

The Plan now proposed dilutes earlier commitment to development in smaller villages. Policy H8 now merely states support for neighbourhood plans which elect to provide for new housing, it does not however make proportional housing growth in settlements a requirement. The Plan also omits any mechanism to 'unlock' additional development sites in smaller villages to facilitate the aspired level of housing growth in villages through applications. Policy H16 merely continues current Core Strategy policy CSR1 and does not provide for any increased development opportunity in smaller villages.

The Core Strategy was adopted in December 2012, therefore the opportunities created in the plan under policy CSR1 for infill development in 'smaller villages' have been effective for a considerable time. One can reasonably assume the infill sites in smaller villages which are developable will have come forward; those that have not are likely to suffer some fundamental barrier to delivery.

Our client's land is located in Forest Hill which is defined as a smaller village in the Plan. A review of the Council's planning application records confirms only one additional dwelling has been permitted in the village since the Core Strategy's introduction in 2012 (P14/S3590/FUL). Forest Hill is not unique as a smaller village, and represents a useful case study on the limited level of housing growth in smaller settlements which has occurred under present policy.

The new Local Plan needs to find housing provision over and above Core Strategy levels with the spatial strategy and associated objectives dependent on sustainable growth in rural areas. The Core Strategy policy (CSR1) is longstanding and is shown to have only delivered one house in Forest Hill since its introduction, clearly a more positive policy is required if the plan is to be effective in meeting the Plan objectives for rural areas.

While we welcome policy H8 and endorsement for growth in smaller villages we do not consider it can be effective, and consequently do not believe the Plan can achieve its stated objectives, without a clear commitment to support proposals which contribute to meeting the cited 5%-10% growth target for smaller villages.

The policy requires modification to include an explicit commitment to provide homes to meet the 5%-10% housing target in each smaller village. The policy must also offer a robust delivery mechanism for it to be effective, including greater flexibility in support for development sites under policy H16 in order to facilitate new housing. We consider these changes to be essential to the delivery of the spatial vision and strategic objectives and thus necessary for the plan to be sound.

*Green Belt Review*

We welcome the suggested review of green belt boundaries, however in view of the housing need and the proposed Plan's objectives which are dependent on sustainable growth in smaller settlements we believe it should be extended to allow development opportunities beyond the allocated strategic development sites.

The Plan is dependent on the delivery of new homes in smaller villages to meet the objectively assessed housing need. Just as important a level of sustainable growth (at least 5%-10%) is needed in each smaller village if the spatial strategy and vision is to be realised.

Draft policy STRAT6 confirms in the green belt the only 'appropriate developments' as defined by paragraphs 145 and 146 of the NPPF will ordinarily be supported by the Council. Policy H8 suggests those smaller villages which do not progress a neighbourhood plan would fulfil their housing need through infill development, however as noted above the Forest Hill, in common with most villages, has very limited infill opportunity.

The Core Strategy has supported infill development in smaller villages for several years and deliverable sites can be reasonably expected to have progressed. A review of the Council's planning application records confirms only one additional dwelling has been permitted in the village since 2011 (P14/S3590/FUL). The published SHELAA seeks to identify all development sites capable of providing five or more dwellings, the only sites identified in Forest Hill are to the village edge, and thus unlikely to be considered appropriate in the green belt.

The absence of infill sites means the planned homes, upon which land supply, spatial strategy, and strategic objectives are all dependent, cannot be delivered in Forest Hill. The same limitation would also serve to constrain delivery in other smaller villages in the green belt. In view of these limitations the draft Plan is not considered effective and cannot therefore be sound.

A strategic review of green belt boundaries around settlements is needed if policy H8 and the broader plan is to be effective. Such a review would allow release of those parcels of land which do not make a beneficial contribution, and serve to direct development to locations where it will not be detrimental to openness.

The NPPF is clear at paragraph 135 that any review of green belt should take account of the need to promote sustainable development. The proposed Plan confirms the necessity for growth in smaller villages as part of the sustainable spatial strategy for the District, it is therefore entirely correct and in line with the NPPF to include smaller settlements in the review.

We believe there is a valid and robust case to be made for removal of the former farm yard at Manor Farm, Forest Hill. Its removal would allow residential development to meet local needs as required under draft Policy H8. The site features substantial buildings which are largely disused. Although it may not fall within the strict meaning of 'previously developed' in terms of the NPPF the large buildings and un-landscaped hardstanding have a clear visual prominence and are an intrusion in the green belt. As they no longer serve a beneficial purpose it would be in the interests of the green belt and the setting of the broader village to put the site to alternative use. The removal of the yard from designation as proposed would be in line with paragraph 135 of the NPPF as:

- It would be consistent with the proposed Local Plan strategy;
- It is not necessary to keep the site permanently open;
- The area could serve plans to meet housing need beyond the Plan period;
- The area is bound by clearly defined permanent physical features.

We believe the indicated green belt revision should be carried forward into the Plan as it has sound planning reasons and justification, however its scope should be increased to reflect the spatial strategy.

If the green belt review is not to incorporate smaller or non-strategic sites at this stage the Council must acknowledge the barrier the constraint presents to its realisation of the Plan's strategic objectives and vision. Paragraph 136 of the NPPF provides for detailed amendments to be made to green belt boundaries to be made through non-strategic policies where a need for changes is established through strategic policies. Provision should be made in policy STRAT6 for local review of boundaries for individual settlements where necessary to meet rural housing need.

### *Meeting Oxford's Housing Need*

Development to meet Oxford's housing need must be located to serve the housing market of the City. Development should be sufficiently close geographically well connected to look toward Oxford.

There is a clear need for housing to serve Oxford where there is presently a significant imbalance between jobs and homes. One of the main effects of the imbalance is an unusually high level of commuting with 46% of workers travelling to the City from outlying areas (Census, 2011). The high commuting levels mean there are substantial issues of congestion, particularly at peak times.

With known issues surrounding the highway network it is essential that any homes to serve the Oxford are suitably located that they do not encourage any additional journeys by private car. Any homes to serve Oxford must be part of a coherent spatial strategy to manage and improve access to the City. Failure to do so would exacerbate existing issues, particularly congestion and fail to meet Plan objectives.

We consider it would be more appropriate to satisfy part of the required housing need through modest developments in a number of settlements in South Oxfordshire which are well related to Oxford to allow housing delivery in a timely manner. Forest Hill is one such settlement capable of accommodating a limited level of growth over and above that suggested to meet South Oxfordshire's own need.

When working under the duty to cooperate the aspiration should always be to maximise benefits for both areas. Development in Forest Hill could benefit the existing village through improving facilities and maintaining a vibrant community whilst also contributing to meeting Oxford's housing need. The sustainability appraisal has shown clear benefits to locating development adjacent to the city, this is particularly pronounced where the homes are expected to meet Oxford's needs.

### *Conclusion*

We welcome proposals to encourage growth in South Oxfordshire's smaller settlements, including Forest Hill, which we believe to be imperative if the vitality and character of villages is to be maintained.

The provision of homes in smaller villages is proposed as an important element of the District housing land supply, with development levels higher than under the current Core Strategy. In order to satisfy this housing requirement we consider it will be necessary to support development in suitable settlement edge locations.

Policy H8 seeks to support growth in smaller villages which is essential to the spatial strategy. The needed homes are however demonstrably undeliverable in Forest Hill which is a smaller village in the green belt. As presented the draft Plan is unsound. We consider it essential to review the green belt in relation to smaller villages in the green belt to allow delivery of planned growth and the vision for a 'prosperous place to live' and meeting the objectives.

### **Where should the housing go? - Potential development site identified**

For the reasons set out above it is considered the Local Plan should provide for allocation of housing in smaller villages, one of which is Forest Hill, with a supporting review of green belt boundaries.

Given its proximity to Oxford it is a sustainable location for housing growth.

The tightly planned form of the village means there are very limited opportunities for infill development (as currently defined), therefore allocation of a site in the village is needed to secure new housing (including affordable).

Lincoln College owns a site which is an existing farmyard with several large buildings that are of no architectural merit and somewhat out of place. Although the site has large buildings it is largely unsuitable for modern agriculture and is put to limited or inefficient and ineffective use. Access through the village is problematic for modern large agricultural machinery. Other vehicles serving the site such as HGVs are less desirable in the village. Access from the south direct from the A40 along Church Hill and Main Street has a very short slip road. Slow moving agricultural vehicles or HGVs leaving, and joining the A40 are potentially hazardous. Their removal from this location would be likely to benefit highway safety.

The yard is open to the main road through Forest Hill and is moments from the A40 and the buses which run along it. There is also a generous cycle and pedestrian path alongside the A40 providing access into Oxford and Wheatley.

As the farmyard is now of limited agricultural use an alternative purpose for the land should be found. Practical re-use of the land is preferable to the site becoming vacant, and potentially falling into disrepair.

The site is well located in relation the principal village facilities. It is around 150 metres from the village hall, 400 metres from the pub and 450 metres from bus stops with services to Oxford.

New development on the site would be much more in keeping with the village and the surrounding countryside than the existing buildings in both scale and design. Development would enhance the character and appearance of the area replacing an existing undesirable development.

Having regard to existing buildings on the site and its general appearance a suitable development could benefit local amenity including the Conservation Area, furthermore new homes would be of benefit to the community. We believe a suitable development could be regarded as having 'very special circumstances' for support in the green belt.

Scale of such development would be unlikely to harm the green belt if growth were related to the existing size of a settlement- which would ensure only modest proportionate growth.

At present such development would be contrary to the development plan given the restricted interpretation of infill. Development more along the line of rounding off as identified above would be equally pertinent to releasing more suitable and sustainable sites for development, with judgement on character to be decided at application stage.

*Summary*

The Local Plan 2034 has to deliver housing to meet the identified need. It is imperative that this opportunity is also taken to enhance the District as a whole, and with enhanced housing numbers spread the benefit that development can bring to a greater number of settlements.

Forest Hill is a sustainable location by virtue of its range of facilities and access to larger settlements. Its location close to Oxford upon an arterial route offers potential to contribute to meeting the housing need of either South Oxfordshire or Oxford City. The village could accommodate modest growth and must be maintained as a village where new housing will be permitted.

The proposed Plan is dependent on the provision of new homes in smaller villages, including Forest Hill, to satisfy housing need and realise the spatial strategy. Green belt policies prevent the delivery of the planned growth in green belt, policy H8 cannot therefore be effective and the plan cannot be sound. We support the principle of the policy and encourage the Council to undertake a review of green belt boundaries around smaller settlements to allow for planned growth, and offer a sound Local Plan.

We look forward to acknowledgement of receipt of these comments. If there is any additional information you require please do not hesitate to get in touch.

Yours faithfully,



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Associate

