15 May 2012

Dear Ms Wilson

South Oxfordshire Core Strategy Examination – NPPF and Proposed Model Policy

On behalf of our client CEMEX UK Ltd, we write in response to the Inspector’s call for comments on the National Planning Policy Framework Model Policy.

Nationally, CEMEX owns a number of strategic sites, which are either due to, or have already ceased being in operational use and is seeking to promote these sites for alternative uses.

Within the South Oxfordshire Core Strategy area, CEMEX owns land at Crowell End Farm, Chinnor and is working with the adjoining landowner, GJ & PF Saw, to promote a combined site of approximately 14ha, suitable for residential development. A site plan showing this combined site is attached.

The site has been promoted throughout the LDF process and representations have been submitted in response to the following LDF consultations.

- Site Allocations Development Plan Document in October 2007;
- Core Strategy
  - Issues and Options Consultation in January 2008,
  - Preferred Options Consultation in May 2009,
  - Pre-submission Consultation in January 2011,
  - Post-submission Proposed Changes to the Submission Core Strategy Consultation in August 2011,
  - Hearing Statement to the Examination in Public in October 2011;
  - Main Modifications to Submission Draft Core Strategy in March 2012.

CEMEX Chinnor

The Combined Site

The combined site adjoins the built village of Chinnor. Chinnor is less constrained by planning and environmental designations, and is a more suitable location for development when compared with the
other larger villages in the District. Chinnor is larger than most of the other locations, such as Chalgrove, Benson, Goring and Woodcote and is not within the Green Belt like Berinsfield and Wheatley. Additionally, it does not border any nature conservation areas unlike Nettlebed.

The combined site is in an accessible location, lying just west of the M40, and east of the A4010. In addition, the site is located near Princes Risborough train station which provides direct services to London Marylebone Station.

It is considered that the combined site is suitable for residential development as a natural and sustainable consolidation of the existing settlement of Chinnor. We consider that the combined site presents a sustainable location for development as it is well connected to existing transport links and served by existing services. The western boundary of the site is bordered by a hedgerow, which clearly demarks its limit, providing a natural boundary to any residential development. In addition, permission has been granted for the Old Klin Lakes development at an adjacent site to the east and allocating the combined site offers the opportunity for a new road connecting the Old Klin Lakes development to B4009 Crowell Road. By allocating development at this combined site, the Council would be applying a broad, comprehensive treatment to this side of Chinnor, consolidating the village. At approximately 14ha in size, the combined site could provide a large part, if not all, of the housing allocation for Chinnor as one of the ‘larger villages’ to be allocated in the Site Allocations DPD. We therefore urge the Council to consider this combined site for residential development.

**NPPF Model Policy**

CEMEX welcome the wording of the NPPF Model policy, recommended by the Inspector for inclusion in the Core Strategy and agree that the wording is appropriate to incorporate the presumption in favour of sustainable development in the NPPF to the South Oxfordshire Core Strategy.

However, CEMEX do not consider that the submission draft Core Strategy and subsequent proposed modifications are sound, and for that reason, the inclusion of the Model policy is not sufficient to secure consistency with the NPPF as it will not resolve soundness issues. The focus of our soundness concerns remain the distribution of housing to the larger villages, and in particular the Inspector’s most recent modification, the ring-fencing 500 units of the 1,154 ‘Larger Villages’ provision to those villages located within the Central Oxfordshire area. This approach represents, in our view a ‘cherry picking’ of South East Plan policies, and has not been adequately tested by the Sustainability Appraisal for the Core Strategy.

The Core Strategy Sustainability Appraisal states that some of the villages identified within the larger village category are unsuitable for significant allocation of land for housing delivery within the forthcoming Site Allocations DPD due to proximity to AQNB or flood risk, therefore placing limitations on the delivery of the plan in its current form. On this basis, the modified Core Strategy remains unsound when tested against the plan making tests of the NPPF, and fails to accord with its requirements to plan for environmental protection and avoid development in areas of high flood risk.

The Inspector’s justification of the ring-fencing of 500 units notes that the Central Oxfordshire’s larger villages are reasonably well-connected compared with the larger villages falling outside of the sub-regional area, which tend to be at greater distance from the nearest towns. The justification put forward contradicts the justification for the allocation of 1,154 units to the larger villages, a purpose of which is to support rural settlements and ensure they continue to provide essential services to a wider hinterland, in accordance with paragraph 55 of the NPPF. In Central Oxfordshire, as the Inspector highlights, larger villages operate in connection with other towns, rather than ensuring the vitality of rural communities.
addition, there are numerous sites outside of the Green Belt within the larger villages in the rest of the District, such as the Crowell End Farm in Chinnor and have been demonstrated to be both developable and deliverable for residential development.

The distribution of housing in the larger villages should be determined through further testing, evidence and consultation during the preparation of the Site Allocations DPD and cannot be predetermined by the Core Strategy.

Summary

CEMEX supports the inclusion of the model policy to the Core Strategy, however, this does not resolve outstanding questions of soundness linked to the distribution of housing. To ensure sustainable residential development in the District, the distribution of housing in the District should be reviewed in accordance with the principles of sustainable development as set out in the NPPF.

CEMEX, working with GJ & PF Saw, consider this combined site to be a sustainable, deliverable and developable location for residential development, and urges the Council to consider it when preparing the Site Allocations DPD in due course.

On behalf of CEMEX we request that we be kept informed of progress with this and future LDF documents, and wish to reserve our client’s position to submit further representations on subsequent documents, including the South Oxfordshire District Council Core Strategy.

We welcome the opportunity to meet to discuss any aspect of these representations with you.

Please contact Robert Devas on 020 7303 3051 if you require any further information regarding this matter.

Yours faithfully,

[Redacted]

PP: Andrew Gale

for Deloitte LLP (trading as Drivers Jonas Deloitte)