

FREELAND PARISH COUNCIL

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FAO Joan Desmond
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14th September 2021

Dear Joan

Re: 21/02627/OUT LAND OFF THE WEST SIDE OF WROSLYN ROAD, FREELAND. Outline planning application for the erection of a retirement community of up to 160 extra care units (C2 use class) with associated communal facilities and open space, with access from Wroslyn Road, (all matters reserved except access) and retention of veterinary practice in the coach house for Inspired Villages.

Thank you for allowing our Parish Council extra time to discuss the above planning application and submit our comments.

Following discussion at our meeting on Monday 13th September, we would like to submit the following response to this application.

Freeland Parish Council is unanimous in its objection to application 21/02627/OUT.

The proposed development in this location is wholly **unsustainable** and unacceptable for the following reasons:

1. **Inappropriate development for the site and village:** The scale, location and type of development are inappropriate and entirely out of keeping with the existing scale and character of the village.
2. **Poor access to amenities and public transport:** The site has very few amenities and no public transport within reasonable walking distance.
3. **Transport planning:** The plans proposed to improve the site's accessibility are unrealistic and so will not make the scheme any more sustainable.

1. Inappropriate development for the site and village

- 1.1. Scale: A development of up to 160 dwellings for over 65s imposed on a village of approximately 570 houses (i.e. a 28% increase in the number of dwellings) would severely skew the overall age structure of the village and so damage its vitality.

- 1.1. Unacceptable site: The West Oxfordshire Local Plan identifies suitable sites for development up to 2031. Part of this site was offered for development whilst the Local Plan was being prepared throughout 2016-2018, but it was considered unsuitable due to its sensitivity both in terms of its landscape setting and its contribution to the rural approach into Freeland. The site remains sensitive and is no more suitable for development now than it was then.
- 1.2. The proposed development clearly does not meet an identified local need: Local Plan Policy H2 states that undeveloped land adjoining the built-up area of villages can be considered for development where convincing evidence is presented that it meets identified housing needs. In addition Policy EW10 governing the Eynsham-Woodstock sub-area states that the focus for new development will be in the Rural Service Centres of Eynsham, Woodstock, Salt Cross and Long Hanborough. Outside of these areas, development will be limited to meeting local housing needs, and will be steered towards the larger villages. Freeland is not a large village, and it has no local need for 160 retirement homes. The proposal, therefore, contravenes these policies.¹
- 1.3. The proposal will affect community viability and cohesion: Policy OS2 states that villages are only suitable for limited development which “*respects the village character and local distinctiveness and would help to maintain the viability of these communities.*” This development is contrary to this policy by virtue of being:
 - an enclosed (albeit ungated) community with an aspiration of self-sufficiency, which ‘ghettoises’ those within it and prevents integration with the local community – an issue raised by Thames Valley Police in its response.
 - aimed at over-65s when the 2011 census confirms that over 40% of Freeland’s population was already over 60. The outcome is that, by those figures, the addition of this development would swell the over-60 population of Freeland to 55%, which is more than twice the national average. This would place enormous pressure on local healthcare services and impact the whole viability and vitality of the village, its scant amenities and the school in particular.
- 1.4. Does not fit village character: Freeland is a ribbon development of individual dwellings, including bungalows, detached, semi-detached and terraced houses. These are densest on either side of Wroslyn Road between the church and the school. The application site, just beyond the church, comprises a major section of one of two strategic gaps in the otherwise continuous development along Wroslyn Road. These strategic gaps help to define the character of the village. Building on this site would remove one of these important landscape features which are much valued by villagers. Beyond these open landscape sections the settlement pattern is much less dense and more loose-knit. At its most dense, there are only 15-16 dwellings per hectare in Freeland, yet this development proposes a density of 45 dwellings per hectare. This is three times more than the existing higher densities in the village and can only be accommodated in the scheme by the inclusion of five wholly inappropriate three storey buildings. The development would also increase housing in the village by about 28%.

¹ It should be noted that the developers of Salt Cross have stated that should a local need for extra-care or retirement housing be identified it could be accommodated there, which is a much more suitable and sustainable location.

- 1.5. Does not fit housing character: The proposal includes large three storey blocks of housing which are completely anomalous in Freeland. Such large and high buildings would be visually intrusive from Wroslyn Road and completely incongruous.
- 1.6. Lighting an unlit village: Freeland is characterised by its absence of street lighting, a facet Freeland residents have fought hard to preserve. The darkness supports large numbers of wildlife species in the village, not least barn owl and bat colonies. Whilst external lighting has not been included in this outline planning application, all best practice design guidance for retirement living communities (for example RIBA's "*Guide for Assisted Living*" or Newcastle University/Churchill Retirement Living's "*Retirement Living Explained: A Guide for Planning & Design Professionals*") underlines the need for well-lit external areas, entrances and vestibules 24 hours a day. It is unimaginable that any retirement community could be built without such extensive lighting, yet such lighting is entirely at odds with the character of Freeland and would permanently damage the ecological value of the area.
- 1.7. Damage to local ecology: The Parish Council accepts that the applicant has submitted plans to mitigate damage to wildlife populations; however, the Parish Council is of the opinion that the damage done could not be mitigated for the following reasons:
- Both the construction period and the ongoing operation of the site, including lighting and vehicle movements, would result in permanent loss of thriving bat, owl and rook colonies on the application site.
 - The current use of the site for horse grazing stimulates a healthy insect population which helps to support bat populations as well as a number of swallow pairs returning to local sites annually to breed; there is concern over not just the site but other bordering fields which would no longer be used for grazing due to the loss of the livery stables.
 - The site together with Chapel Field forms an important wildlife corridor between the estate woodlands of Eynsham Hall and the wildlife rich farmland to the east.
- 1.8. Damage to landscape and heritage value: The site lies on the edge of the Estate Farmland Landscape Character Area as defined in the "*West Oxfordshire Landscape Assessment*". As outlined in 1.4 above, the character of Freeland is defined by the two strategic gaps in the development along Wroslyn Road. These are either fields with well developed hedgerows or, in the case of the application site, typical Estate Farmland landscape, which gives a strong sense of place to the village. The walled garden and stables to Freeland House within the site in turn enhance the Victorian Gothic revival set piece by the celebrated Architect, John Pearson, comprising St Mary's Church, the old village school and the Parsonage. The distinctive character of this historic core of the village would be severely compromised by the proposed development.
- 1.9. Impact on mature trees: The proposal includes widening the existing 3m wide access drive and improvements to the site entrance visibility splays, as well as the creation of a new construction access track. These works would all impact on the tree Root Protection Areas of most of the mature trees in the northern part of the site. The proposed use of 'no dig' construction methods in these locations is difficult to enforce and, therefore, would be ineffective. The long term viability of the mature trees on the site could also be compromised since it is likely that future residents of the proposed "village" would require them to be cut back or removed to avoid leaf fall / shading to their dwellings.

2. Access to amenities and transport

2.1. Ability to access local amenities through walking: Newcastle University/Churchill Retirement Living's "*Retirement Living Explained: A Guide for Planning & Design Professionals*" states that:

"Ideally retirement schemes should be within easy walking distance of the town centre or nearest high street...Sites that are more than half a mile from local facilities are not considered."

The proposed site for this development is over a mile (1.6km) from the nearest bus stop or any essential services such as a shop and a doctors' surgery. As a result, future residents would be almost totally reliant on their cars for all journeys.²

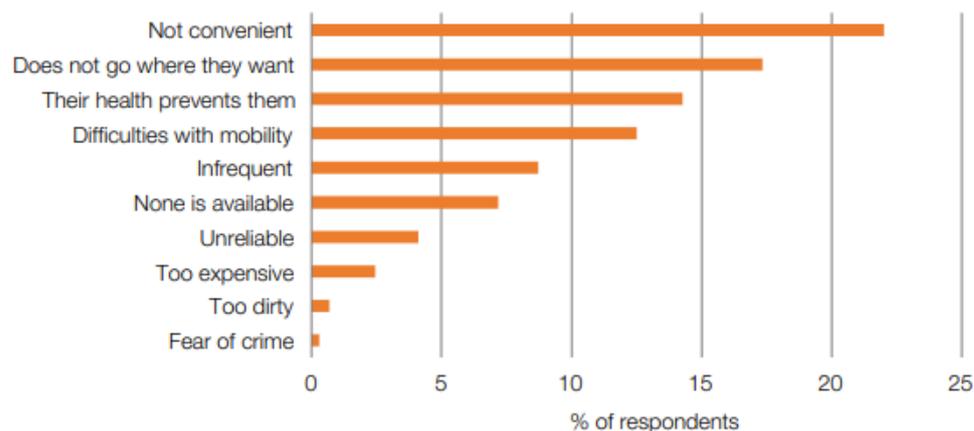
The applicants appear to justify their proposal at Freeland by comparing it to its other sites which are either adjacent to bus stops or – at most – 900m away from a bus stop. However, the distances from the application site in Freeland to local services are:

- Nearest bus stop – 1.9km
- Doctor's surgery – 2.4km
- Shops – 3.1km (Co-op at Long Hanborough)

2.2. Lack of local shops and services: Freeland has scant amenities to support a retirement population. Existing Freeland residents who no longer have a car are reliant on friends, neighbours or the Volunteer Link Up scheme based in Witney to take them to shops, local doctors, and the Oxford hospitals. As it stands, many struggle to obtain transport slots, especially at short notice. This is even to get to the nearest doctors' surgery in Long Hanborough.

2.3. Lack of access to public transport: With a 1.9km walking distance to the nearest bus stop, it is worth noting the ILC-UK/Age UK report "*The Future of Transport in an Ageing Society*" which points out that two thirds of respondents do not use public transport because it is either not convenient, does not go where they want, their health prevents them, or they have difficulties with mobility (see the chart below).

Fig 13: Reasons for not using public transport given by those over 65



Source: English Longitudinal Study of Ageing wave 6, 2012-13

² In this case the applicant has relied upon The Chartered Institute of Highways and Transportation's "*Guidelines for Providing for Journeys on Foot, 2000*" to provide reasonable walking distances, which suggests that in terms of commuting, walking and recreational journeys, walking distances of 500m are desirable, 1,000m are acceptable, and 2,000m will be 'considered'. However, this advice is for all ages and assumes an average walking speed of 1.3m/s. Research carried out into the capabilities of older pedestrians (over 65) found a) it was more likely they would have walking speeds of 0.8m/s to 0.9m/s, making journeys far longer and less realistic, and b) around 80% of participants had walking impairments (Asher *et al.*, 2012, <https://doi.org/10.1093/ageing/afs076>).

3. Transport Planning

- 3.1. Shuttle bus provision: The proposed 'solution' to the lack of public transport as detailed in section 2 is proposed as a shuttle bus service. This is idealistic and completely unworkable. In reality, new residents will rely on their own cars because of the lack of autonomous public transport. Shuttle bus transfer is unsustainable and adds further vehicle movements. Such an 'on-demand' service would provide no benefit over use of the residents' own vehicles.
- 3.2. Cycling routes: The provision of cycling routes in this part of West Oxfordshire is patchy and paths are not well finished. There are no dedicated cycle paths in Freeland and if residents cycled to a bus stop, they could have nowhere to leave their bicycle. Again, reference to this in the application is a work of fiction.
- 3.3. Use of residents' cars: Freeland Parish Council finds the applicant's assessment of likely car ownership among residents as unrealistic due to it being based on statistics for sites which are far closer to public transport facilities. In addition, staff will find it difficult and time consuming to use public transport to get to work – having a 20min+ walk from the nearest bus stop, so are far more likely to commute by car. Therefore, the additional traffic movements from the proposed development have been under-estimated. Notwithstanding this, the 523 estimated additional traffic movements per 12-hour day, as set out in Table 8 of the Transport Statement, is significant in itself.
- 3.4. Existing vehicle movements: The Parish Council finds the applicant's assessment of existing combined vehicle movements (369 per 12 hours) unrealistic, amounting to a vehicle passing approximately every two minutes during the day. Local knowledge indicates strongly that this is not the case and that these numbers are vastly inflated with the result that the percentage increase in traffic movements from the proposed development has been significantly under-estimated.

So, in summary, as you can see from the above, this application is the wrong development in the wrong location and is completely unsustainable for the reasons set out in this letter.

The Local Plan was established following a consultation with residents of West Oxfordshire and went through rigorous examination by the Planning Inspector in order to provide security to communities and protect them from speculative development. If this application were to be approved this would make a mockery of the whole Local Plan agenda and undermine the whole process.

Freeland Parish Council strongly urges the WODC Planning Department to remain resolute and to uphold the Local Plan and its objectives.

Yours sincerely

Lisa Smith
Parish Clerk
Freeland Parish Council