

West Oxfordshire Local Plan 2031 – Stage 3 hearings.



Written submission on behalf of Eynsham Parish Council

Introductory Note:

It was stated at the Stage 2 hearings that there had been co-operation between Eynsham Parish Council (EPC) and WODC, as required by planning guidance¹ where a qualifying body brings forward a [Neighbourhood Plan](#) (the ENP) while the Local Plan is still in preparation.

Meetings did take place until the Local Plan modifications were put out to consultation, since when no meaningful conversations have been had.

The comments made by EPC to the consultation were dismissed with the note that the ENP carried no weight as it had not been subject to independent review. Actually it has now been reviewed in a Health Check which, although it does not change its legal status, did indicate that the ENP, as brought forward, should meet the conditions of soundness when formally examined.

The relationship between the [Eynsham Neighbourhood Plan](#) and WODC's support for it remains a source of contention. The planning guidance¹ requires a Neighbourhood Plan to be "in general conformity with the strategic policies in the adopted local plan" and, to the extent that the ENP includes both a western extension and the Garden Village, this is the case.

*There are differences of detail which are important to Eynsham and it seems clear from the same guidance that a NP is not obliged to slavishly follow the **policies** of a Local Plan as long as it follows the **strategic direction**, as the ENP does.*

Massive changes in the strategic situation of Eynsham – 250 houses at the start of 2016, 3250 by the end of 2016 – mean we have not been able to get our plan in before March 2017 and currently it is stalled because guidance given by WODC last year about the need for an SEA was misleading and we are required to partially rewrite and re-consult on this particular matter.

Our plan has most definitely been "brought forward" and the previously quoted guidance says

"Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body"

A proactive and positive response is not a situation we observe currently; WODC remain adamant – as expressed by officers as recently as the Lowlands Planning Meeting on 12/06/2017 - that the [Eynsham Neighbourhood Plan](#) is of no weight or consequence.

There are a number of places in these responses where reference is made to matters in the ENP which, if it had been taken note of, would have materially strengthened the Local Plan.

EPC remains keen to work with both WODC and OCC to bring together development on both sides of the A40 and the associated Park and Ride in a co-ordinated manner.

We are very disappointed that WODC has not engaged with us, even after assurances at the Stage Two hearings that they had been, and by implication were still, in ongoing and meaningful dialogue with us.

Acronyms used : GV or OCGV – Oxfordshire Cotswold Garden Village. OCUN – Oxford City's unmet housing need – e.g. people who will need to find their new home outside the City.

¹ <https://www.gov.uk/guidance/local-plans>—2, Para 13 Reference ID: 12-013-20140306

Matter 11 – Witney sub-area.

From our location half way between Witney and Oxford along the A40, the road itself and the extra traffic it will have to carry as a result of the additional housing proposed for Witney, is a major concern to EPC.

As we have looked further at the emerging Local Plan and its process, we have increasing concerns over a **lack of positive preparation in that there is no real evidence that WODC have exercised their duty to co-operate with OCC on strategic transport matters**². There is no doubt that the A40 is 'strategic' to the district as OxLEP have been promised funding for improvements on grounds that congestion is having an adverse economic effect on the whole district.

This being so, there should be evidence that WODC and OCC are working together on matters such as *additional* Park and Ride facilities nearer to Witney (which has support within Witney Town Council), extension of the dual carriageway to the Eynsham Park and Ride and then further measures to link up with the A34 trunk road near Wolvercote.

There are also serious concerns about the number of extra junctions to access the SDAs at Eynsham. The inclusion of extra junctions through lack of joint working between councils, who are unfortunately at loggerheads over unitary status, will have an impact on all of us along the A40 catchment.

Another concern for Eynsham is the **justification for about 60ha of extra employment space** to be shared between OCGV and Witney.

While Eynsham Parish Council agrees with placing employment near to housing to minimise commuting by car, we are very concerned that there will not actually be the businesses wanting to use the space, leaving a half-finished employment area in one or more locations. Eynsham wants to see high-technology businesses which will provide large numbers of jobs and not warehouses which are visually intrusive in a rural location while bringing more heavy traffic and fewer jobs.

EPC also remains concerned that Oxford City's unmet housing need – not forgetting that these are real people being referred to by an acronym – are apparently being denied the opportunity to live in the district's main town with its supermarkets and extensive entertainment and shopping resources. Our reasoning is given in our response to Matter 12.

WODC should re-consider the likelihood than some Oxford City people would prefer to live in a larger town and not force them towards a 'one size fits all' solution.

² <https://www.gov.uk/guidance/duty-to-cooperate> Paragraph: 014 Reference ID: 9-014-20140306

Matter 12 – Carterton.

As the EIP process has progressed, EPC has concluded that there are three areas where concerns previously expressed by Eynsham converge with those of Carterton.

The first area is the **A40 which we have already addressed under our response to Matter 11** and won't repeat except to reiterate the district-wide impact of A40 congestion which affects Carterton residents travelling east for work.

Secondly, the phrase “Duty to co-operate is not duty to agree³” is mentioned more than once in the guidance on the implementation of this duty which seems to be the basis for all the Oxford City homes going to Eynsham and leaving Carterton short of the new people it wants.

EPC considers that WODC have failed to distinguish properly between co-operating and agreeing in preparing their plan with serious consequences for the communities of Eynsham and Carterton and the individuals from Oxford who will be looking to take up residence west of the city.

Instead of engaging positively with Oxford City (OC), WODC appear to have accepted whatever OC suggested concerning the 'unmet housing need'. They seem to have accepted the criteria agreed behind closed doors (e.g. housing quanta must be 500 or more, all 'unmet need' housing must be as close to Oxford City as possible) and applied them without considering the impact on their own district or, particularly, **the reasonable alternatives**. They may have done this out of fear that they won't be seen to have met their duty to co-operate or out of laziness in not thinking the consequences through for themselves – but why is less important than the result.

The negative consequence is that all the new homes have gone to Eynsham and none have gone to places, like Carterton, who are keen to take them. Carterton might be a much better alternative for those unable to afford the higher prices of Eynsham or who may wish to look for employment in Witney (with its 20 ha extra employment space) or in Carterton itself.

The consequence of failing to prepare the plan with a balanced approach to the duty to co-operate is that alternatives are not being considered resulting in significant harm contrary to the wishes of at least two local communities and reducing the choices available for individuals who are OC's 'unmet need'.

The third area of common ground is a practical one – young people whose parental home is in Eynsham often have to move to Carterton to be able to buy a home of their own as it is the most affordable location in West Oxfordshire. This position is unlikely to change if 2750 Oxford City residents, used to even higher prices, are moving to Eynsham. Carterton offers people the choice of lower prices at the expense of a longer commute to Oxford and **they should be allowed to make that choice for themselves**.

Perhaps most of the 450 'local' homes allocated to west Eynsham should actually be allocated to Carterton as this reflects affordable reality - leaving the 550 Oxford City's 'unmet housing need' homes as one estate for west Eynsham.

Our consultations with Carterton reveal just how stark the contrast is between our situations.

Eynsham faces two SDAs and intolerably intense levels of development on every developable scrap of land. Village sustainability is threatened by loss of amenity and bio-diversity accompanied by extreme pressure on resources with OCC already talking of busing Primary-age children. There is every likelihood that delivery will not be to the schedule required in such a pressured situation.

Carterton has capacity in its schools and is concerned that the towns sustainability is threatened by a lack of new homes! It has enough land for sites such as the one recently refused for 115 houses at WODC planning (12/06/2017) which is described as '115 houses in a country park'.

Why does Eynsham have to be over-developed while Carterton remains under-developed?

³ <https://www.gov.uk/guidance/duty-to-cooperate> Paragraph: 021 Reference ID: 9-021-20140410

Some suggest that this perverse situation comes about because WODC did not wish to change too much from the original version of the local plan in case the version currently under examination is seen as 'new' rather than a 'major modification'.

EPC representatives at the hearings so far have observed a process in which WODC proposals are steadily pushed towards soundness in a thoroughly positive manner. This is EPC's wish too.

EPC hope that WODC will be encouraged at the hearings to make whatever modifications are necessary to the plan to ensure its soundness in terms of delivering homes where they are needed and wanted in the most timely manner. These modifications should be made on evidence and common-sense, not to conform to a perception, probably unfounded, that WODC will be somehow 'caught out' by the process of examination.

Evidence and common sense indicate that WODC should:

- **Allocate more houses to Carterton where they can be built quickly, many before 2021.**
- **Allocate fewer houses to west Eynsham so that development can proceed there without delay or the other negative impacts noted under matter 14.**
- **Allow time to properly evaluate the OCGV site using DCLG funds allocated for the purpose.**
- **Complete an objective assessment of the alternative GV sites now put forward.**

Matter 13 – no comment at this time

Matter 14: Eynsham – Woodstock sub-area allocations.

14.1 Is EW2 policy .. *(text in italics from NPPF 182 for the benefit of the author and EPC readers)*

- **Positively prepared** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*
- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities*

EPC's main concern about a lack of **positive preparation** relates not just to the housing levels but also the supporting infrastructure. The A40 is already running over capacity and removing 500 cars per day (OCC current Park and Ride plans) is hardly going to cover the increase in traffic generated locally, let alone the 15,000 new homes to be built in the district as a whole.

The A40 should be seen as a 'cross-boundary' strategic priority so OCU can get to Oxford once they move out here. Without some visible efforts at collaboration with OCC, WODC are not presenting a positively prepared or deliverable plan. Eynsham's NP with its emphasis on reducing junctions and leaving a protected route for an upgraded A40 is far more realistic in this regard.

Justification requires consideration of **reasonable alternatives, based on evidence**. We note that the consideration of an alternative site at Barnard Gate, which was otherwise rated the same as North Eynsham, was dismissed despite being beside the A40 like all the others. The wording of the assessment of this site includes a degree of 'team preference' which is inappropriate in such an important situation⁴. The same extreme disparity of result for very similar locations is seen in the LUC Oxford Spatial Options Assessment, Sept 2016

An alternative site south of the A40 was never included in the LUC study, even though it is perfectly reasonable (as a proposal has been made) and that the 'next to parkland' argument does not apply. To dismiss it now that it has been made, out of hand, is irrational leaving WODC open to challenge when they could and should have prepared a proper argument for and against. This is further evidence that WODC is prepared to make decisions without attention to the justification detail, bringing all decisions relating to what became the GV location into disrepute.

If there are two possible GV developments within 2 km, there absolutely must be a proper sequential assessment of the merits of the two sites. Promoting one and dismissing the other, without valid reasons, apparently because you thought of the first and not the second, is no way for an LPA to justify major strategic planning decisions.

WODC must present an objective and reasonable assessment of alternative major sites particularly for OCU and justify its decisions before this policy can be considered sound.

14.2 Blenheim World Heritage Site.

No comments at this time.

4 [OGB_SEP2616R03 Appendix One Post SHMA Strategic Work Programme Final Report.pdf](#): p48

14.3 Is allocation to West Eynsham(EW1b) soundly based with justified and effective policies?

EPC does not consider the allocation of 1000 house to west Eynsham is soundly based, either in terms of total number which is too high or the need which is skewed by the flawed decision to allocate every one of the OXUN homes to Eynsham.

It has been accepted as part of the ENP that a western development can be accommodated and careful consideration of the development options was done, using the same criteria as CD10, to determine the optimum balance between delivery of homes and minimising the losses that development in the countryside inevitably brings (see note on CD10 below).

It should be noted that the number proposed in the ENP was significantly more than necessary to meet local need as assessed by WODC. Only when WODC decided to allocate 550 OCUN homes to west Eynsham did the Local Plan numbers go beyond the 600 that the ENP considered to be readily deliverable on our preferred site north of the Chil Brook.

A more practical scheme, in keeping with the nature of this location, will be deliverable and will not cause the loss of local amenity and bio-diversity that the link road and its 250 extra houses will bring. See [Eynsham Neighbourhood Plan](#) Spatial Policy, ENP17.

In fact a scheme of appropriate scale is already taking shape as a masterplan being prepared by a developer who, unlike WODC, sees merit in working with Eynsham. It is likely that a planning proposal can be brought forward well within a year so that work can begin in 2018, probably on three separate sites, allowing 600 to be delivered in the next 5 years.

WODC should reconsider a more appropriate proposal which is readily deliverable in a very short time-frame rather than hold out for something grander that may never happen.

The figure of 1000 homes itself is not justified by rational assessment either of need or of the site. It appears to be driven by two considerations which are spurious and unjustifiable:

- the allocation of OCUN in quanta of 500+
- applying traditionally low building rates for the GV site so that no more than 2200 homes can be built from 2021 to 2031, forcing 550 onto west Eynsham to make 2750 in total.

EPC argue under Matter 16.2 that the traditionally low build-out rates will not be acceptable for a GV as it won't deliver the necessary infrastructure in a timely manner; we also point out that there are alternative options for building at a faster rate which WODC must pursue to ensure viability.

EPC point out in Matters 11 and 16.1 that allocating in large quanta, while having some point if a *separate* estate is proposed, is irrational and counterproductive where this 'need' is being accommodated as part of *existing* large settlements with all the necessary facilities available.

Negative consequences for the west Eynsham site include:

- All the available land would need to be developed leaving little opportunity for good design or successful blending of rural and urban forms.
- Public amenity of accessible green space and the footpath network is lost as the paths are subsumed into an urban development while bio-diversity gain will be hard to achieve.

WODC should concentrate on building the separate settlement in a timely manner rather than over-develop an existing settlement simply to compensate for desultory build rates of the past.

In examining CD10 it became clear why this unsound judgement has been allowed to go forward. The landscape assessment on page AIV34/35 of CD10 notes that the site is bounded by "... the playing fields associated with Bartholomew School to the south" which corresponds with the maps in LUC Oxford Spatial Options Assessment (probably the same as the "Oxford Growth Options Study" referenced in CD10). Actually the playing fields align with *the middle* of the site of EW1b!

The Eynsham NP assessed the CD10 area as Option W1 of the [ENP Site Assessments](#). EPC assessed

alternatives, as it is expected to do, and has shown that the EW1b site (ENP option W2) has significantly more negative outcomes than the CD10 / Option W1 site.

A proposal for 1000 homes has been entered, based largely on an outline concept from one developer, without checking on key sustainability issues relating to bio-diversity, public amenity or practicality and viability of a Chil Brook road crossing

WODC have arbitrarily extended an incomplete SA to the whole site but, as the [ENP Site Assessment](#) shows there are material differences precluding anything less than a full – and properly objective - reassessment of the proposed EW1b site.

(It will be noted in 14.4 that WODC have done exactly the same thing with the GV site where CD10 only covers the uncomplicated southern part of the site.)

EPC's preference for protecting the area south of the Chil Brook from development is based on robustly assessed evidence and should be taken into account by WODC as a part of their duty to take the emerging Neighbourhood Plan into account while the Local Plan is being finalised.

14.4 Evidence and justification for WOGV / OCGV

We have noted that 'robustness' is not a prominent feature of the evidence offered for many of the decisions relating to WODC's allocation of OCVN, mostly to one purpose-built site.

At a fundamental level, it appears that the numbers used to justify the level of OCVN are based on a 'maximal' figure for Oxfordshire rather than based on averaging or weighted predictions. Furthermore, no margin of error seems in evidence nor is a graph showing current minimum and maximum trends by which a reality check may be made. It is therefore very difficult to be sure that the levels predicted are realistic and reliably justify the numbers presented.

EPC has not previously challenged the numbers from the Growth Board as we don't have the in-house expertise or access to adequate raw data to do so.

EPC are now uncertain that anyone has the right figures to work with and therefore ask and expect that this examination will call for reliable evidence to justify the growth predictions that underpin the whole of the OCVN allocation.

It could be argued that the need for housing is so acute that any development will be occupied and will be sustainable in this area. **But this is not any development – it is a new settlement** requiring all-new infrastructure with serious capital backing and long-term vision to succeed.

Starting the GV project and then failing to complete it as a proper GV would be disastrous for all concerned. In addition to failing to deliver the homes required, it is inevitable that the public facilities will be the main casualties leaving residents, who thought they were moving to a GV, on a huge detached housing estate, dependent on their cars to get to Eynsham for local amenities.

It would be utter folly to proceed with a GV project if there is any doubt about the location, the financial backing or the actual need for such an undertaking, therefore the evidence in these matters needs to be more obviously robust than for other developments before accepting that this entire project is viable or deliverable to the schedule proposed.

There is no adequate evidence presented to support the project in the current policy. There can be no confidence that OCGV will deliver until the detailed justification has been completed using the funds awarded by DCLG.

There are other matters where **robustness of evidence** is seriously lacking, such as

SA (CD10) coverage is not of the whole GV site – the LUC assessment includes only half the site nearest the A40 and this is reflected in CD10 which omits the heritage and economic assets of City Farm and DEC aggregate recycling plant.

CD10 also omits the Tilgarsley deserted medieval village site which will inevitably require archaeological work and slow down delivery of the project.

CD10 also omits reference to the Site of European Importance for Arable Plants which again only affects the northern part of the GV site. While this designation apparently doesn't stop development it is an objectively assessed measure of bio-diversity which needs to be at least matched in order to meet the requirements of NERC 2006 (section 40) or be bettered to meet NPPF 109 for a net gain of biodiversity. It is not made clear how this can be achieved in a timely manner.

CD10 does note that the eastern half of the site has been included on the Strategic Minerals Area map but there is no indication that OCC will waive the need to protect this site from development.

Unfortunately these are not inconsequential acts of carelessness – there will be at the very least delays in implementing the GV plans which bring the whole project – for which timing of delivery is of the essence - into question.

It may be noted that the same southern area of the site was assessed as part of the Eynsham NP as Option N1/N2 of the [ENP Site Assessments](#) document. Our Option N3 assesses the whole of the EOI site and does note significantly more negative outcomes which are not considered in CD10. We also expected much more in terms of improvements to the A40 to achieve our scores which would include significantly more negatives if we based it on the 'minimal changes' approach adopted in CD10.

We have noted in our response to Matter 16 that viability and delivery of a new settlement will depend on building at a rate beyond that normally experienced in West Oxfordshire and requiring a different approach to the types of houses built. It would meet the definition of madness to rely on the same developers using the same approach to building and expect a different result in terms of delivery rate. Even that delivery rate will not meet the promises of EW1a as soon as there is any delay to the project, as there inevitably will be for reasons we have already noted.

WODC need to take a robust and pro-active approach and look for genuine alternatives to traditional techniques to ensure both financial viability and timely delivery of both houses and infrastructure.

Unless this intention to pursue an alternative approach is explicitly included in the policy, it is inevitable that the policy will under-deliver on the promised housing numbers.

Transport infrastructure proposals show an interesting bias away from what is essential but difficult towards what can be delivered but may not actually be of real value.

Thus the state of the A40, which we all know has county-wide negative economic impact, is mentioned in passing while a 'northern link road' which goes from and to nowhere is proposed to be part an integral part of the GV!

It is astonishing to local residents and A40 users that no serious attempts are being made to involve the new GV, whose £1000M project is totally dependent on the A40 for its transport links, with active efforts to improve the road. Even including a 'protected route' through part of the GV site, as recommended in the Eynsham NP to allow future improvements, would be a start. Instead it seems that WODC are prepared to shrug their shoulders and blame OCC for the poor transport infrastructure while relying on the new Park and Ride buses to convey residents to work in Oxford.

There needs to be proper evidence of intent with explicit detail of methodology included in the policy before it is accepted that transport issues will be properly and co-operatively addressed.

The Science Park proposal has been noted under Matter 11 as new employment sites are shared between OCGV and Witney. There has been a recent trend on our southern industrial area for new businesses to be in warehousing and distribution; that's not in itself a bad thing as we need a wide range of job types and we do have high-tech firms as well.

However, Eynsham Parish Council's support for a new 'Science Park' concept north of the A40 is only for a development predominantly of that type with the right jobs and right style of building for its countryside location. Furthermore the ENP recommends that its scale be no more than what is proportionate to the extra residential allocation nearby.

This element of policy should be much more explicit in its intent to attract high-value jobs to a semi-rural, low-profile, location where large warehouse sheds are not appropriate and should be resisted.

Matter 15 – Burford, Charlbury and AONB

The concept of an AONB policy was not put forward for comment previously so EPC is taking the opportunity to comment on it now.

Eynsham Parish Council has become very concerned at the increasing division within West Oxfordshire between the protected and wealthy tourist-attracting areas of the district and other areas which seem to be doomed to become the dumping ground for development which WODC doesn't really want in the nice areas.

Unfortunately, the recent New Forest AONB decision which appears to turn the 'presumption in favour of sustainable development' on its head, could result in negative unintended consequences, particularly given WODC's history of over-reacting to any hint that the Examiner is unhappy about an element of their policy. There is inevitably a sensible balance to be found concerning appropriate development in an AONB but we don't want WODC to create a policy which will last for 15 years based on an over-interpretation of the situation today.

We welcome the inclusion of an AONB policy as the AONB is something of value to be protected and cherished for everyone. We are only concerned that the policy will not allow reasonable and well-considered development and have the unintended consequence of an increasing segregation between AONB areas for the wealth only and the rest of the district.

As part of our Neighbourhood Plan (NP) we noted that one of Eynsham's good features is its mixture of people in terms of young and old, different educational backgrounds, different trades and professions. We are aware that high prices and an ageing population may adversely affect this balance, even for Eynsham, and so we have emphasised the need for smaller properties alongside 'affordable' and rural exception homes in the ENP.

The trend towards imbalanced communities will be far more pronounced if development in the AONB is too restricted, unless good policies are included to ensure practices such as rural exception sites and the provision of smaller and affordable homes are included. EPC ask for guidance from this Examination to WODC to encourage them to include such policies.

Matter 16 – 5 year land supply

16.1 Separate housing requirements

Allocating Oxford City Unmet Need (OCUN) separately allows WODC to push the majority of the 'new' housing requirement to the Eynsham-Woodstock sub-area on the grounds of closeness. It also allows Oxford City (OC) to insist on large quanta of housing wherever OCUN is being allocated. West Oxfordshire offers a good mix of town and village locations yet this approach locates all the OCUN in one location in the highest price bracket. There is no intention to operate parallel OC and WODC housing lists so the proposed separation of need is of no practical benefit to OC 'refugees'.

The approach taken does have serious (and permanent) negative consequences in that it forces more homes on Eynsham due to the irrational insistence on large 'estates' for OCUN which will actually be occupied by anyone without discrimination rendering OC insistence on it absurd. Our reply to Matter 12 has applicable references to DCLG guidance on "Duty to Co-operate" which we think has not been properly followed in this regard.

While there is an obvious and justifiable reason for locating some, perhaps the majority, of OCUN housing close to OC, the artificial distinction between the two 'needs' drives perverse and irrational outcomes and gives OC 'control' over areas where it should not have jurisdiction.

16.2 Addressing a housing shortfall in the first 5 years

It might be more reasonable to ask if there is *any* deliverable alternative which doesn't 'back-load' delivery to the latter years of this plan!

Certainly, in the case of a new settlement, there does need to be planning ahead but we argue that a radically different model of delivery is essential both to ensure that a critical mass builds up quickly to support infrastructure provision and to meet the urgent need for housing.

WODC and the developers supporting it have a very poor history of delivery and it would be foolish to expect the same people and process to bring about a different outcome. Instead, a different approach and different developers should be used, focussing on using factory built homes – which only need come from Witney as one of the major players in this field is based there – and emphasising the building of non-market housing without the 'slow release' technique adopted by some private developers to keep prices high. These factors should be a key part of the remit in drawing up the masterplan for OCGV.

EPC strongly supports the setting up of a mechanism to co-ordinate development north, south and of the A40. It is shocking that such a mechanism is not in place, possibly because WODC and OCC are at political and personal loggerheads over unitary status.

It is quite clear that WODC is dragging its feet over proposals already brought forward for west Eynsham so they can foist pet projects like the Link Road on developers while they wait to set up two independent SDA zones when this plan is adopted.

WODC has failed to deliver enough new homes over the last few years and needs to show how it will do better. However, it would be appalling to compound this negative situation with rash and ill-considered decisions, either forced on West Oxfordshire through the Local Plan process or through opportunistic development resulting from the lack of a Local Plan.

16.3 Suitability and adequacy of site allocations

(a) EPC comment to the WOLP consultation noted the surprising absence of adequate reserves making under-delivery highly likely.

(b) Growth is highly concentrated in a way that would not be sustainable if perpetuated in future local plans. EPC also has serious concerns that WODC apparently expects existing communities to expand indefinitely and without limit.

It is a vital principle of the Eynsham NP that a village community works best when people naturally walk to shops and schools and, in doing so, meet and interact with their neighbours. Eynsham works well with 2000 homes and might just be able to work with as many as 4000 homes although by then there will be more than one primary school and the concept of one community will start to be diluted. Going beyond that makes a village into a town (albeit without a town charter). We are aware that other villages are linear in form and are no less communities but engagement work for the ENP convinces us that the nucleated model works best for larger villages and should be the model adopted where it is practical to do so.

For this reason, many Eynsham residents saw the separate Garden Village community as not unreasonable. OCGV is now losing all support in Eynsham as the problems – such as the listed buildings, archaeology, existing minerals site, bio-diversity and other issues addressed in Matter 14 - mount up and the area suitable for housing decreases.

Separation (only by the A40) was always an issue – as noted in the ENP. The new concept of a 'distinct' settlement will simply not do unless it is also clear that the two communities will not be competing for resources and will have a mutually beneficial relationship as demanded by the ENP.

WODC should include within the relevant policy how distinctness between communities will be achieved and how they will become independent but co-operating entities.

The same reasons that have steadily destroyed any support for OCGV in Eynsham are also reasons that undermine delivery of 2200 GV homes, on time and in a recognisably GV format.

It might be feasible to deliver 2750 homes in the 2021-2031 period but the evidence is all going in the wrong direction at the moment. There can be no confidence that OCGV will deliver until the detailed justification has been completed using the funds awarded by DCLG.

One way to make things happen, which ENP strongly recommends, is the creation of an overarching masterplan to co-ordinate sites to the west and north of Eynsham and we have already stressed the **immediate need for co-ordination** of this area with work on the A40.

However, we question the designation of SDA for west Eynsham where substantial sites are already being brought forward naturally and where the imposition of an SDA may slow rather than accelerate delivery. The real need is to co-ordinate masterplan activity **and do it now**, not in many months' time as part of a belated, imposed and artificial SDA.

WODC as LPA should take a lead in actively co-ordinating development at Eynsham. So much activity close to one settlement requires careful co-ordination to ensure that developments do not conflict with one another, do not demand too many scarce resources, do not overwhelm an already stretched transport network and do not make life for local residents a misery.

There will be reliance on post 2021 delivery but, as noted before, there are ways to ensure that delivery does become a reality. Planning for a 2021 start date for the GV is realistic but will also become a self-fulfilling prophecy; there must be active 'project management' on behalf of WODC to shorten the timescale or it will probably drift further. This includes delivering the extra 2200 homes to help out Oxford City which will require more than 'business as usual' and for which an

SDA or AAP is appropriate and probably essential.

Clearly WODC have a trust deficit to overcome in convincing anyone that they will 'do better next time'. WODC must not only have clear and pro-active delivery plans but a monitoring mechanism to ensure plans remain on track, particularly with large strategic sites such as OCGV.

The inclusion of C2 (Care Homes) would suggest a certain degree of barrel-bottom scraping which in turn indicates a lack of confidence in the deliver-ability of the overall plan numbers. There is a well-attested need for homes to down-size into, typically only two bedrooms but with somewhat larger rooms than typical starter homes and the need for extra-care accommodation is noted in the ENP.