

### **Eynsham Parish Council (EPC) Statement.**

EPC is very disappointed in the way that Eynsham has been treated throughout the process of modifying the local plan and incorporating Oxford City's unmet housing need as all of the latter has landed on Eynsham. At the same time, Eynsham has been completing its Neighbourhood Plan which is currently dismissed by WODC as having no weight until it receives an independent examination although it does not reject WODC plan proposals, only seeks to add flexibility to ensure a sound plan can be prepared at the masterplan stage.

Eynsham Parish Council considers that the proposed Local Plan will not be able to deliver the quantity of new homes required and will result in a lower quality of both the natural and built environments within the parish. In particular we note:

- Too many houses to the west of Eynsham. Limited scope for good built design and natural environment will likely result in the ambitious numbers not being achieved in practice.
- A desire to build link roads of limited value while very little attention is given to solving the real local transport infrastructure issue for the whole district which is the A40.
- A very high proportion of the houses added since the previous Local Plan version are allocated to Eynsham, adding unnecessary risk to a plan which has no reserve sites.
- All Oxford City's unmet need has been placed on Eynsham using decision criteria which are poorly justified and at odds with the concept of building sustainable, cohesive, communities and providing a range of life-style options.
- All suggestions for modest amendments and increased flexibility within the plan have been dismissed, indicating an unwillingness for meaningful community engagement.
- A hasty and poorly-researched set of amendments have resulted in a plan of lower quality with inadequate support by the SEA and other documents.

When the previous attempt at a Local Plan was summarily dismissed by the previous examiner, Eynsham's Neighbourhood Plan was set to propose an allocation of around 750 new homes to the west of the village. This was far more than the unrealistic 250 proposed by WODC which were too few to meet local needs and below the number necessary for a viable extension to the village. A development of that scale is easily deliverable and could be designed without destroying the ready access to nearby rural countryside which is the necessary compensation for the lack of a village green or park within Eynsham's compact 'nucleated' form.

WODC chose to allocate Eynsham as the only site within the district for Oxford City's unmet housing need. They justify this by using highly skewed selection criteria which inevitably singles-out Eynsham as it is the closest location to Oxford with a road connection that looks good on a map. However, the A40 between Eynsham and Oxford is one of the most congested roads in the south-east, already operating above its theoretical capacity on a daily basis and where a reduction of 500 or even 1000 out of 10,000 cars per day with the proposed Park & Ride bus will have little impact.

It must be noted that the decision to allocate to Eynsham itself, rather a site one mile further west, is based on an Oxford Growth Board/LEP assessment which has the two sites as equally suitable with the choice largely arbitrary and lacking any objective substance apart from a slightly shorter journey time on the A40. As it turns out, an alternative Garden Village style proposal for 2000 homes, hotel and business space is about one mile further west of Eynsham, albeit on the south side of the A40, but this has also been dismissed out of hand by WODC without consideration of its merit.

The decision to allocate all the unmet need to Eynsham – as opposed to just most of it – is based on the perceived need to allocate in blocks of 500 houses. As this decision appears to have the support of the City Council, it is not clear if this is to ensure that Oxford people feel secure from the predations of country folk or vice-versa. In either case the idea seems to hark back to slum-clearance projects of the 1950's rather than be planning for harmonious integration into an existing mixed and welcoming community. While Eynsham people love living there and are willing to welcome new residents, they do at least recognise that some people would prefer to live in a town with supermarkets and serious night-life or perhaps near a railway station that would allow easy access to Reading or London and we find it bizarre that all of them are being directed to a village location adjacent to the hopelessly congested A40.

Unfortunately this anachronistic decision has consequences for Eynsham as its implementation forces 1000 homes onto the west of the village, requiring every square metre of developable land to be used for houses. As a result there is no space available for any good design to mitigate the loss of open space. It should be noted that this high number is based on the very preliminary proposals of the Berkeley Strategic Land development consortium who, of course, have a vested interest in maximising the number of houses, but may no longer be deliverable now that they have fallen out with the owner of the land giving access to the A40 who has now brought forward alternative proposals with a different developer.

Eynsham's Neighbourhood Plan originally had the land north of the A40 earmarked for an extension of the village as part of upgrading and realigning of the road to improve its flow, possibly but not necessarily, to dual carriageway. EPC consider successful integration of a northern extension to be very difficult with the A40 in its current location so our plan called for a route to be protected from development until such time as a proposal including the new route could be brought forward. The Neighbourhood Plan still includes this possibility now that the alternative Garden Village site has been proposed and the site north of Eynsham may no longer be needed as a separate settlement but will still continue to be a target for development.

The Oxfordshire Cotswold Garden Village proposal was put together in great haste and it shows in the lack of considered detail. From the 'iconic bridge' which would cross over people's front gardens to ignoring a permanently-consented and recently re-equipped concrete recycling plant, the plan is very short on relevant detail. Although surprised that this proposal met the criteria for a Garden Village, EPC welcomes the awarding of this status as it will enable these details to be considered sooner rather than later and the practicality and viability of the project determined. As it stands, with unaddressed ecological and heritage constraints to a significant part of the proposed site, the proposal must teeter on the brink of undeliverable and must represent a very high risk to the overall deliverability of the entire Local Plan housing numbers as a result.

From a planning design view-point, the concept of two villages of about 3000 homes each, with roughly equal facilities, separated from each other but joined to the rest of the world by one highly congested A-road must present an interesting challenge. Garden Village status requires that these villages be fully separated but they will share, at the very least, a Senior School and will inevitably share some social infrastructure such as places of worship, pubs and restaurants, specialist shops and clubs and societies. The Neighbourhood Plan considers some sharing to be mutually beneficial for the two communities but regards dependence of the new community on Eynsham as bad for both.

The clear risk is that the new settlement will not be a Garden Village in any meaningful sense but will be a classic overspill housing estate with poor facilities, dependent on the use of the car for access to most services with such access via a road that is already over capacity. This makes little sense from a sustainable planning perspective.

It isn't clear if good planning is a material concern in determining a Local Plan to be sound. It is the contention of Eynsham Parish Council that good planning, taking account of reality on the ground and, to some degree at least, the well researched considerations of local residents embodied in the emerging Neighbourhood Plan, should be a material matter in this case.

**Conclusion:** A substantial proportion of the homes added to the Local Plan in its latest form are allocated to Eynsham. As it stands these proposals are so far from demonstrable practicality that it jeopardises the entire plan. EPC therefore suggests that the Local Plan as proposed does not demonstrate that it can deliver the number of houses it puts forward, particularly as it has no reserve provision.

At the very least, the highly prescriptive allocation of numbers of houses and new link roads to specific sites in the Parish of Eynsham should be set aside so that the delivery of houses either side of the A40 can be considered as a whole and with more attention to reality, good planning and local needs. Attention should also be given to alternative and perhaps more viable locations for some of the proposed new homes, including the possibility of building elsewhere in communities whose willingness to welcome more residents has also been ignored by WODC.

A number of detailed comments explaining our concerns about the viability of and recommending changes to the Local Plan proposals have been submitted by Richard Andrews, the Deputy Chairman, on behalf of Eynsham Parish Council.

Eynsham's Neighbourhood Plan in its current form can be found at <http://eynsham-pc.gov.uk/org.aspx?n=Neighbourhood-Planning&id=255>