



***Transition Eynsham Area
12 Abbey Farm Barns, Eynsham
Oxon. OX29 4FA***

tel 01865 580502

Ms Rosemary Morton
Programme Officer C/O Planning Policy Team
West Oxfordshire District Council
Elmfield, New Yatt Road
Witney OX28 1PB

18 - Dec - 17

Dear Ms Morton,

re WODC LP2031 'Sustainability Appraisal (SA) Further Addendum Report' 11.17

On behalf of our members I thank you for the opportunity to respond to this consultation and I enclose the response of our climate change group, 'Transition Eynsham Area' (GreenTEA), to the report.

Chapter 1

1.5 p13/473 or 4/31 We regret the decision of WODC to accept Oxford City Council's 'unmet need' for houses. The basic premise here is all wrong. Ideally, from the **climate change** (SA Objective 10) point of view, all workers should be housed within a kilometre of their work, or on an efficient public transport or cycle route. Oxford workers should be situated within the city boundary so that their commute to work does not hold up commuters from the rest of West Oxfordshire, whose traffic jams on the A40 and the B4044 are already of serious concern, and unlikely to be alleviated by anything short of a light railway. Traffic jams, of course, increase the carbon contribution even more.

Much of the 'unmet need' could be accommodated in the numerous unused brownfield sites within the city: <https://www.cpre.org.uk/> It would be a pity to use sites on the green belt but this local issue has to be weighed against, the world issue of the cataclysmic effects of **climate change**.

If the 'unmet need' decision can still be reversed we would be very much in favour of doing so. After all, the 'duty' of WODC to the City Council was only 'to cooperate', not to obey, and other District Councils have not accepted these high housing targets, which have been widely challenged.

Having accepted Oxford City's 'unmet need' of 2750 houses, WODC proceeded to allocate the whole quota to Eynsham! This would nearly treble the size of Eynsham thus changing its whole nature from a self-contained and vibrant village to a suburb of Oxford.

If the decision to accept Oxford's overspill is finally accepted, then the two main options proposed for Eynsham are:

Chapter 4 - a Garden Village of 2,200 houses to the north of the A40 road, plus alternatives.

Chapter 5 - a West Eynsham development of 1,000 houses with a bypass road, south of the A40, plus alternatives.



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Chapter 4 p.23/473 (14/31) **Alternatives to Proposed Garden Village** (OCGV):

Three possible Garden Village sites are considered in the SA document:

4.1 - map p.201 or 3/30 **1. Eynsham site**, north of A40. "Oxford Cotswold Garden Village"(OCGV). Houses built on this site would NOT constitute a Garden Village by the official definition. The site would therefore not qualify for government finance. WODC even admitted at the LP hearing that it would NOT be a separate settlement.

OCGV would contribute an unacceptably high proportion of additional commuter traffic to the A40 and, being adjacent to the A40, would receive unacceptably high levels of pollution via the prevailing SW wind. It would also destroy existing valuable farming land with high grade soil (1-3) over 95% of it! (LUC's 'Oxford Spatial Options Assessment' p.288. It is notable that this study which is frequently referenced only covers the southern part of the proposed garden village site). Currently it is farmed organically and the area also includes a remarkably biodiverse site of European importance (Plant life) in addition to a Local Wildlife Site. Ideal for local food production, with farm-fresh produce saving transport energy and for resilient, biodiverse habitats.

It was NOT approved in principle by the Eynsham Neighbourhood Plan (ENP) and we are at a loss to understand why Eynsham is being manipulated and penalised for preparing a Neighbourhood Plan. Further obstacles to the OCGV site are the noise and pollution from the minerals-reprocessing plant at New Wintles Farm; and the presence of the remains of the medieval village of Tilgarsley, an unexplored archaeological site. Presumably the minerals reprocessing plant will not be erased; the compensation required would be huge. So, in the middle of the 'Garden' Village there will be a large industrial site with constant HGV traffic! Furthermore it is partly river-flood-land, the area of which will increase with global warming

The Oxford Sustainable Options Assessment (LUC, Sept 2016), maintained that "construction of a Garden Village in this location would result in severe, long term landscape & visual impacts." In addition, Appendices C&D of the SA note "wildlife interest at City Farm Local Wildlife Site, and loss of high grade agricultural land."

None of the sites is conveniently close to Hanborough station, and in the absence of realistic public transport options, all sites will add to the congestion, carbon emissions and pollution of the A40.

4.2 - map p.211 (13/30) **2. Barnard Gate site**, north of the A40

High grade farming soil type 3a. Valuable existing woodland acts as a carbon-sink.

It is unreasonably close the A40, will contribute to road congestion and subject to pollution via the prevailing SW wind.



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4.2 - map p.220 (22/30) **3. South Leigh site**, south of the A40 (Gladman developers). This site will also depend on the A40 and add to its congestion with no convincing public transport option. It is also a greenfield site but with poorer soil than the other two.

Chapter 5 p.28/473 (19/31) **West Eynsham Strategic Development Area (SDA):**

Three possible solutions are considered in the SA document:

- **Eynsham West** Strategic Development Area - 1000 houses

5.5 This site has high grade farming soil type 3a and 3b. The land south of Chilbridge is the only direct access to the countryside adjacent to Eynsham. We would not want houses all over it, or a relief road across it impeding access to the countryside. The ENP (p.49) states that "Creation of a Link Road and development south of Chilbridge Road have significant drawbacks" And Eynsham Parish Council considers that "the harm due to the loss of such a significant area of green space so close to the village with ready public footpath access outweighs any benefit ..."

- **Hanborough Station** - 900 houses

5.4 The railway station at Long Hanborough (10 min to Oxford) with rapid low carbon access to Oxford and beyond is a priceless gift which should be used to the maximum. 900 houses built there will significantly reduce the threat of further congestion on the A40 associated with other options, and will reduce the number of commuting cars with their greenhouse gas and polluting emissions.

- **Split site** - Hanborough 450 houses, and Eynsham West 550 houses.

5.8 If the OCGV were refused, this would constitute a reasonable total of houses to accommodate Eynsham workers in Eynsham, in line with the recommendations of the ENP. GreenTEA members oppose the West Eynsham relief road, so the fact that this level of development would not justify the relief road would not be a problem. The Sustainability Appraisal notes that this option has fewer negative impacts than 1,000 houses at Eynsham

General points:

Housing. Planning permission should only be given for houses to Passivhaus standards and with a well researched energy strategy, including options for renewables, community and decentralized energy as set out in the draft Local Plan. All transport and other enabling infrastructure for new projects to be completed before house building starts.



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With an ageing population, priority given to building compact sheltered accommodation, preferably in conjunction with care-homes, would free family houses and thereby reduce the number of new houses needed.

Biodiversity. An expanded and linked network of biodiversity-friendly sites and high quality landscape with plenty of trees would provide carbon-sink possibilities for greenhouse gases and would encourage the survival of the diverse population of plants and animals essential to further evolution.

Climate Change. The impacts of climate change on Eynsham will probably include increased **flooding**. Housing sites will therefore need to be carefully chosen from sites which are at present considerably above the recorded flood levels. Drains will need to be plentiful and well maintained. **Extremes** of heat and cold will need accommodation with house design. The Passivhaus concept, using generous roof overhang or awnings for shade in the summer, would be ideal.

Carbon Emissions will increase with runaway global warming therefore trees and woodlands will become increasingly important to act as **carbon-sinks**. Existing ones should be energetically conserved and, bearing in mind development time, new ones will need to be planted as soon as possible. The expected decrease in meat diets will free pastureland for vegetable-protein plants and trees, further increasing carbon-sink possibilities.

Soil resources will become increasingly valuable for the growth of protein crops to replace cattle meat. Therefore the quality of farmland should be most carefully assessed before consigning it to housing.

With many thanks for your attention.

Yours sincerely,

Rosalind Kent Hon Sec Transition Eynsham Area (GreenTEA).