



How to comment on WODC local plan changes between now and December 23rd.

You can get a paper form by phoning WODC on 01993 861667. There will be **printed copies of the plan in the Library**. Unfortunately you really need a new form for each part of the plan you comment on so this can become tiresome unless you only focus on one area.

It is much easier to comment on the **online version**. This also gives you a chance to look at the comments other people have already made and is much easier to make multiple comments.

You do need to **register or log in** first at <http://www.westoxon.gov.uk/login/> This is a worthwhile thing to do anyway as you do get personal notification of planning applications near your house, and really useful stuff like whether the next bin collection is domestic or garden waste.

When you've logged in, you can find the on-line consultation here <http://bit.do/WODCLPcomment>

Remember you can **only comment on the text which is underlined** – no problem for us as almost everything relating to Eynsham is underlined as it has changed since the last version!

When writing your comment you cannot easily **refer to the text** you are commenting on. This is easily fixed by **opening another browser tab**, using the same link again (no need to log in) to bring up the text separately, then you can read it, find references, etc., while you make your comment.

You can **only comment on** three specific matters, legal compliance, soundness and meeting of the Duty to Co-operate. Of these **only soundness is relevant**; this is defined as

To be considered 'sound' the proposed modification must be:

- **Positively prepared** – i.e. 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** – i.e. the Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.
- **Effective** – i.e. the plan is deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- **Consistent with national policy** – i.e. the Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

Only comments which directly relate to these issues will have any effect; please concentrate on anything which falls short of being 'sound' in relation to any of these three features

- not being objectively assessed
- not having considered alternatives adequately
- not being deliverable over the period (up to 2031 in this case)

You should aim to **give reasons** why it isn't sound as presented and you are invited to re-write the relevant text in a form which you think would make it more sound.

Some of the things we will be commenting on are on the next page. These are very specific – as they need to be – and the thinking behind them is not always obvious. We have put detailed reasons on the following pages

We are interested to hear any other ideas you have and will include them onto the website so others can use them too. Please send your thoughts to richard.andrews@eynsham-pc.gov.uk or eynsham.futures@gmail.com If you have questions try this link first <http://bit.do/ENP-FAQ>.

How will Eynsham Futures be responding to WODCs Local Plan changes.

These are some of the areas we will be commenting on. We offer these as suggested areas for your comments and welcome any suggestions from you which we will include on the website.

1. **Para 9.37 / Table 9.4:** The changes to the LP make no allowance for non-delivery of any particular site. There is no **reserve provision** within district, sub-area or even within the SDA/AAP areas at Eynsham. Table 9.4 is typical, requirement is 5500 but total of proposed sites is 5474 – no spares at all.
2. **Para 9.5.40 a-d:** Strategic Development Areas (SDA) **should have local Eynsham involvement.** Although Tilgarsley will eventually become a separate entity it will be very similar to Eynsham and will benefit from local knowledge and involvement during the Area Action Plan (AAP) stage (**para 9.5.40h**) and early build stages.
3. **Para 9.5.40 h-r:** various features of Tilgarsley Garden Village are noted – many of them good ideas – but there should be a commitment to investing in the Area Action Plan as soon as possible, if necessary using local WODC resources. **Para 9.5.40q** providing all the necessary facilities in the new village is good but **Para 9.5.40r** – good links between Eynsham and Tilgarsley (without the unnecessary and impractical 'iconic bridge') may be used by developers to back-pedal on building expensive infrastructure. **Para 40q** should be a binding principle, **Para 40r** is a nice benefit except that safe crossing must be provided for students attending Bartholomew School which should be listed in **Policy EW1a**.
4. **Policy EW1a, a)** 'Up to 2500 homes...' would give flexibility to shift provision from West Eynsham to Tilgarsley to improve prospect of overall delivery of the required total homes. Scope of Area Action Plan should include both Eynsham sites – this is hinted at but isn't clearly stated. **EW1a f)** should be emphasised more as there is no existing infrastructure in this case.
5. **Policy EW1b, a)** '750-1000 homes..' would be a better description, matching EW1a and giving some flexibility of design at the Masterplan stage.
6. **Policy EW1b, c)** asserts that the provision of a link road is an essential ingredient – this is not a proven case with significant dis-benefits to Eynsham and viability implications. Wording should allow the possibility of a link road after proper evaluation of cost, benefits and alternatives for improving local transport infrastructure at Masterplan stage.
7. **Para 9.5.41 c-d:** no consideration seems to have been given to spreading some of Oxford's unmet needs wider, offering at least some alternative to living in one 'village' location with one transport option. Lifestyle choice is at least as important as just being close to Oxford if this is not to be an Oxford overspill estate.
8. **Section 7, Transport Policy T2** should require a proper cost-benefit analysis of building Link Roads and/or improving existing roads. Given limited funds apart from developer contribution, all funds should be focused on the most beneficial results as part of AAP development. Link Roads need to be defined – 40+mph HGV routes or 20mph local roads within built-up area. The alternative of 'safeguarding' an improved route for the A40 between Eynsham and Tilgarsley should be included as this could deliver more benefit than local link roads and show due cooperation with OCC to benefit the wider district.

We are interested to hear any other ideas you have and will include them onto the website so others can use them too. Please send your thoughts to richard.andrews@eynsham-pc.gov.uk or eynsham.futures@gmail.com

If you have questions try this link first <http://bit.do/ENP-FAQ>.

We have put detailed reasons for these comments on the following pages together with a few other areas which you may want to comment on.

Reasons : Too many houses allocated without any flexibility or reserves.

Our main concern is that too many houses have been allocated to the west of Eynsham. There is no provision within the plan for 'reserve' sites; everything has to be built to meet the numbers.

Much of the demand for housing west of Eynsham is to meet Oxford's unmet need, all of which has been allocated to Eynsham. This allocation has been made on the basis of an appraisal of sites done in conjunction with the Oxford Growth Board giving the appearance of a comprehensive consideration of alternatives but we dispute this on the following grounds

- Allocation of >500 to any chosen site was intended to ensure adequate infrastructure on new sites – there are other sites in West Oxfordshire where infrastructure already exists that could easily accommodate smaller parcels of the unmet need.
- Placing all unmet need effectively in one location sharing the same main road and the same 'large village' context is very restrictive socially, economically and physically.
- While Eynsham is conveniently close to Oxford, the distance to existing centres such as Witney, Hanborough and even Carterton is not so excessive that a lesser proportion of the unmet need could and should be located elsewhere to extend choice of alternative transport links (e.g. rail), alternative employment opportunities and the option of living in something closer to a city environment offered by a large market town.

For these reasons we consider that inadequate considerations of alternatives have been made and that the allocation of the remaining 550 homes to west Eynsham is unsound.

Allocating 1000 houses to West Eynsham is also unwise on delivery grounds. The site map does not show that about half the site is either flood plain or school playing field and unavailable as building land. Achieving the required number of homes requires a density of 33-35/ha and will have a distinctly urban form. The ENP does not regard this density as a bad thing in the village itself but it will present a visual intrusion if on ground raised above well-walked paths such as Chilbridge Road. Even if screened by planting the result will be visually quite poor – imagine the footpath from the old railway line to Chilbridge Road with a tall hedge up close right along its length to screen the houses built between there and the Chil brook.

The draft Neighbourhood Plan suggests that 800 homes (including 160 already permitted) can be built in the northern section of the proposed site using a low-cost access road from the A40 which links up with Chilbridge Road to access existing farms and homes. This area can be screened from the public realm quite easily by planting in the otherwise unusable flood zone of the Chil Brook, limiting the apparent intrusion into open countryside

Keeping the area south of the Chilbridge bridleway free of urban development will ensure the link between urban and rural environments is kept close to the village centre. The ability to walk easily from the village centre into open countryside is a key differentiator between a large nucleated village without a central green or park such as Eynsham and a market town.

Our concern is that the high number of homes allocated to west Eynsham does not permit design considerations such as those mentioned above to come into play as there are no 'reserve' locations within the Eynsham - Woodstock sub-area into which all of Oxford's unmet need is to be concentrated.

There should be provision for some 'local need' housing to be built in the Garden Village as an alternative to West Eynsham. Although it may take a little longer to get the GV started (but then investment from sources other than the GV competition should be used if the EOI is unsuccessful), 250 extra homes should be just as deliverable here as they would be a few hundred metres away on the other side of the A40.

Reasons : Transport

To build all the 1000 houses will require significant infrastructure such as the A40 - B4449 link road which developers may not be willing to fund when they could build most of the houses from a more modest link from the A40 only. There is a perfectly good through route down the Eynsham eastern bypass and, although some traffic goes through the village to get to the Southern industrial Estate, this is nowhere near as serious a problem as congestion on the A40 itself.

Two 'Link Roads' are included for this area (Section 7.43ff, policy T2) which proposes 'safeguarding' the routes (i.e. not building over where a road might need to go in the future).

It is not clear if Link Roads re intended to be

- 40+mph routes which bypass the built-up area, suitable for unrestricted use (e.g. HGVs)
- routes through residential areas fronted by housing therefore not suited to through traffic and subject to traffic-calming measures to achieve the 20mph limit currently being sought by the Parish Council.

There are a number of issues for us:

A West Eynsham Link Road will inevitably result in houses (and a road) over land south of Chilbridge Rd which has been discussed in the previous section. Originally the ENP wanted to protect this route too but now we have concluded, in the light of further consideration and consultation that

- the cost of the road will not be affordable from the additional houses built
- the wider economic benefits of the link will be limited
- serious landscape, amenity and environmental harm will result which will in no way compensate the local community by reducing the relatively low level of through traffic in the village which could just as easily be remedied by reducing A40 and Toll Bridge congestion.

A Northern Link Road between Cuckoo Lane and Lower Road is proposed for Tilgarsley; we consider that this may also have very limited economic or social benefit when properly evaluated.

The next paragraph of Policy T2 then talks about the really serious issues associated with existing A40 and Toll Bridge congestion.

There should be some linking of these issues so that money from these extensive developments is allocated to the best local road improvements that can be objectively shown to yield the best improvements in overall journey time for new and existing residents. There is no point having local link roads if they only link into an already congested route.

It seems apparent that 'Link Roads' are considered to be something WODC should be concerned about while the A40 is left to the County Council. This seems a classic case of lack of cooperation between councils which should not be considered acceptable by either of them.

Other significantly changed issues you may want to comment on:

Para 8.35 and following: Renewable energy policies