



# **Eynsham Neighbourhood Plan 2017 – 2031**

## **Sustainability Report**

**Draft for submission to West Oxfordshire  
District Council, July 2017.**

Version		date	Nature of change	Editor	Reviewers
Draft	1.0	07/05/17	Creation at WODC request	RA	BC(Enfusion)
Draft	1.1	11/07/17	Amendments after review	RA	BC(Enfusion)

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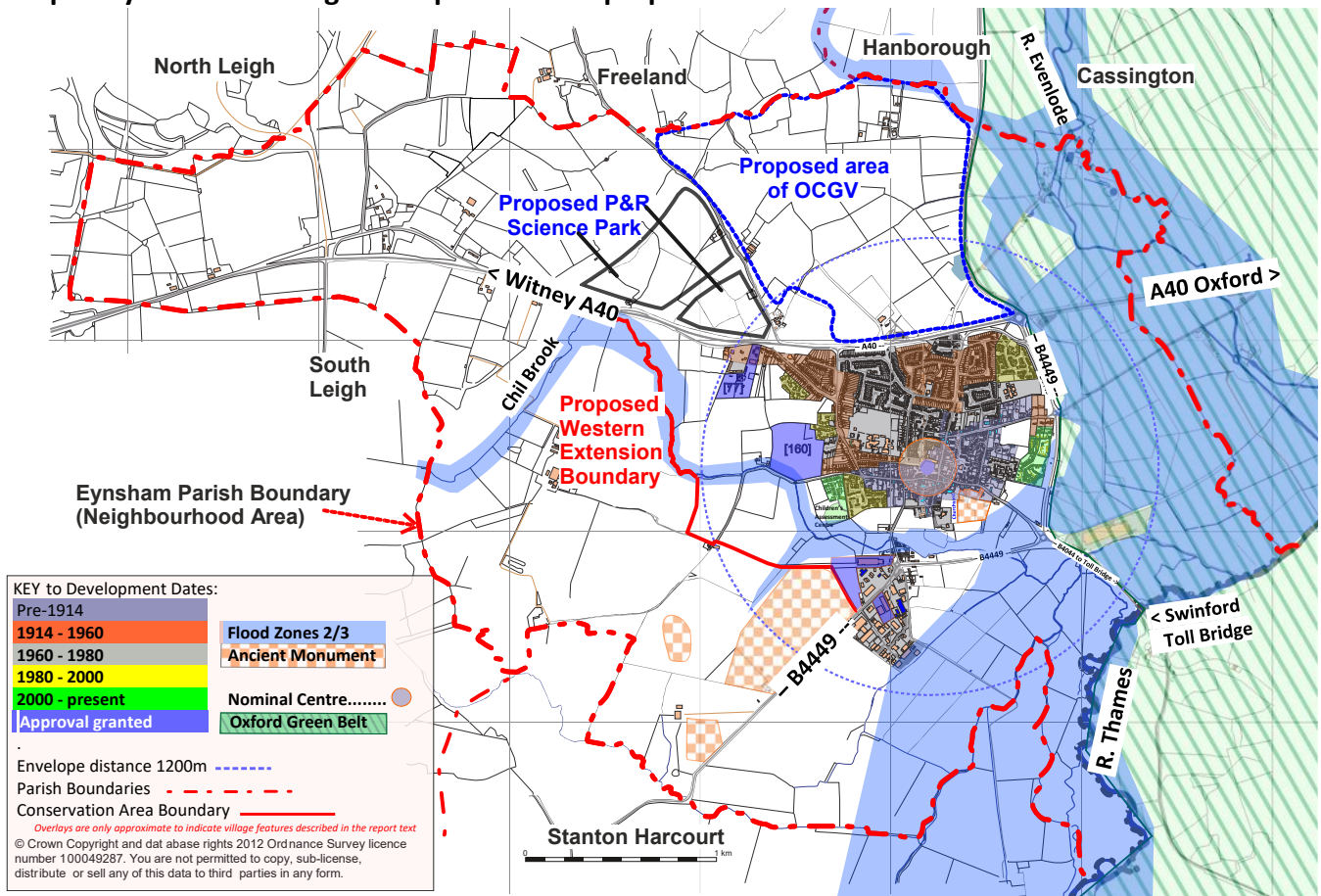
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Referenced Documents – with links to documents on the [Eynsham Parish Council web-site](#).

<a href="#">ENP Site Assessments</a>	
<a href="#">ENP Sustainability Assessment Scoping Report</a>	<a href="#">Rural Community Profile for Eynsham</a>
<a href="#">ENP Consultation Statement</a>	<a href="#">Initial community engagement findings,</a>
<a href="#">ENP Supplementary Consultation Documents</a>	<a href="#">Pre-submission consultation feedback report.</a>

Note: the acronym OCGV (Oxfordshire Cotswold Garden Village) is used for the proposed Garden Village site north of the A40.

Map of Eynsham showing development areas proposed in West Oxfordshire Local Plan 2031.



Map shows parish boundary and adjacent parishes.

Constraints on availability of development land are clearly visible

- to the east from both flooding and Oxford Green Belt.
- to the south from flooding, a scheduled ancient monument and an existing, detached, industrial area.
- to the west from flooding of the Chil Brook
- to the north east of the OCGV site flooding is apparent but listed buildings and an existing aggregate recycling business also restrict land use.

The areas proposed for development for housing (western extension and OCGV), Park and Ride and Science park are outlines clearly indicating the extent of expansion proposed in the parish showing how all the available land is allocated and explaining why the ENP has so few meaningfully 'alternative' or 'less preferred' sites

# 1 Summary (non-technical)

## 1.1 Introduction.

The Sustainability Report fulfils the need for a Sustainability Assessment (SA) and Strategic Environmental Assessment (SEA) to accompany the Eynsham Neighbourhood Plan (ENP) as required by EU regulations as the ENP has policies which apply to specific sites and is being brought forward at a time when the equivalent documents of the West Oxfordshire Local Plan 2031 have not yet completed their formal examination process and therefore do not yet cover the sites discussed in the ENP. Full reasons are provided in Section 5 of [WODC SA Screening Document](#).

Evidence gathered from various official data sources were used to prepare an initial SA scoping document based on that prepared by WODC for their emerging local plan. The results are summarised in an SA Framework (SAF – Table 5.2 of [SA scoping report](#)) which includes 20 SA criteria against which to assess the policies and sites included in the ENP to ensure they match local needs and objectives as the plan develops.

A summary of the Sustainability Assessment process is provided in [Table 2](#)

## 1.2 Sustainability Characteristics of Eynsham.

Eynsham is well-placed close to Oxford but road connection is via the A40 which is hopelessly congested or via the Swinford Toll Bridge which can have 30-40 minute delays during rush hour. Eynsham's house prices are high due to its closeness to the City to the point where few locals can afford to buy their first home in the village.

Eynsham does have a full range of local services and public transport and an excellent senior school making it well liked by its residents. There is a good mix of house types, both rented and owned, occupied by a wide mix of ages, trades and professions.

The village lies on a gravel ridge just north of the River Thames, tightly hemmed in by continuous functional flood plain from the south west to north east with the A40 forming a northern boundary. The village has been intensively developed, doubling the village size since 1960 and filling almost every possible development site. Limited green space within the village is provided by mature trees while easy access to open countryside within easy walking distance compensates for lack of a village green in the centre of the village. There is a Conservation Area and the site of Eynsham Abbey next to the Parish Church is a scheduled monument.

Landscape is rolling farmland with a mix of arable and pasture, some of the latter north of the A40 managed for wildlife conservation under a Higher Level stewardship scheme. There are no designated environmental sites within the parish but retaining the existing structure of fields, waterways, hedgerows and trees is important both for wildlife and for the benefit of the human population.

Full details are included in the [SA scoping report](#) Section 4.1.

## 1.3 Objectives of the Eynsham Neighbourhood Plan

### 1.3.1 Housing Objectives

- Decide the appropriate number and types of homes required to meet the needs of existing and future village residents.
- Identify sites with the potential to deliver the homes required together with the necessary infrastructure to support the needs of individuals and the community generally.
- Create a comprehensive Plan document so that lessons learned in preparing the plan are not then ignored during the development itself.

### 1.3.2 Environment Objectives

- To integrate new development with the design and setting of the existing village.
- To minimise adverse impacts on people and the natural/historic environment while encouraging access to and beneficial use of the countryside for both residents and wildlife.

### 1.3.3 Transport Objectives

- To encourage active mitigation of the current road access problems already faced by residents and

businesses to ensure long-term viability of new developments.

#### **1.3.4 Local Economy objectives**

- To encourage the regeneration of the business and industrial area to the south of the village while ensuring existing businesses thrive and provide work for new residents.
- To allow for non-traditional housebuilding such as self-build, small-holding and the like to better use the countryside close to the village.

#### **1.3.5 Community Objectives**

- To share the benefits of new developments with all residents, recognising that previous piece-meal developments have not always mitigated the full impact they have had on services, particularly schools and healthcare facilities.
- To ensure that new properties address important issues for existing residents such as an ageing population, more homes for single persons, down-sizers, young people and key-workers from the village forming their first households.

### **1.4 Assessment of the Eynsham Neighbourhood Plan.**

Policies (in the [Eynsham Neighbourhood Plan](#)) were cross-correlated with the SAF and the results recorded in [ENP Consultation Statement](#) Section 04 to ensure that residents comments were addressed in the policies as they were being prepared wherever the ENP is permitted to do so.

Possible development sites (in [ENP Site Assessments](#)) were initially assessed by scoring various options for positive and negative impact on each of the 20 SAF criteria. However, towards the end of the process, WODC allocated a total of 3200 new homes to Eynsham which meant that all possible sites were allocated leaving the ENP with no reasonable alternatives to choose from.

Such a large number of new homes (taking the number of homes in the Parish from 2000 to 5200) will have a significant impact on all aspects of village life, particularly the physical and transport infrastructure necessary to support such an increase in population.

Therefore the ENP seeks to address all the issues identified by the SA such as - the right type of well-designed homes, keeping the village compact, requiring health-care and other services to be built on time, providing green spaces and increasing bio-diversity, specifying low energy homes, enough school places, transport, foot, cycle and mobility vehicle access, parking, retail shops and employment.

Two 'spatial policies' address the particular requirements of development west and north of the village with policies designed to mitigate adverse effects which are particular to development in these locations.

### **1.5 Consultation.**

Consultation through various events and surveys during the plan preparation process was used to check that the SAF matched the wishes of local people as well as identified needs – see [ENP Consultation Statement](#) Section 04. A further stage of consultation was undertaken once the plan was nearing completion with both residents, statutory bodies and interested parties such as land-owners. The resulting feedback and consequent changes to the plan are recorded in the [Pre-submission consultation feedback report](#) which includes comments from the statutory bodies in relation to the SA itself.

### **1.6 Monitoring of the plan over its lifetime.**

The application and effectiveness of the ENP will be monitored annually by WODC to ensure it is still effective in meeting its objectives. If circumstances change significantly the plan should be revised.

Table 1 – Eynsham Neighbourhood Plan – history of events and publications

Date	Events and Documents - <i>'Title' and location in NP submission documents</i>
October 2014	Eynsham Parish Council agrees to seek a Neighbourhood Plan
November 2014	Eynsham Futures Steering Group (EFSG) set up to create the plan
December 2014	WODC confirms that Eynsham Parish is designated as a Neighbourhood Plan area.
February 2015	'Community Engagement Strategy' prepared – <a href="#">Consultation Statement (CS) Support Docs.</a>
March 2015	<p><a href="#">Distribute leaflet</a> to all homes inviting people to the <a href="#">launch events on March 21/22</a></p> <ul style="list-style-type: none"> <li>- open-ended questions to get opinions, comments, concerns and big ideas</li> <li>- record on post-it notes on the day and collated by EFSG team</li> </ul>
April – July 2015	<p><a href="#">Community engagement events continue</a> through summer 2015 – <a href="#">CS Section 03.</a></p> <p>Complete first version of 'Community Engagement Findings' - <a href="#">CS Support Docs.</a></p>
Summer 2015	<p><a href="#">Sustainability Assessment (SA) Scoping Report</a> created from available data sources to build an SA Framework with which to any site or policy could be assessed - <a href="#">SA Table 5.2.</a></p> <p>Cross-correlate SA framework and <i>Community Engagement Findings</i> – <a href="#">CS Section 04.</a></p>
October 7, 2015	<p><a href="#">Public meeting</a> to identify what people mean when they want to “retain a village feel”</p> <p><a href="#">On-line, detailed, survey</a> launched with notification in Eynsham News – runs to Jan. 2016.</p>
Autumn/Winter	Drafting of policies and assessment of sites begins.
January 2016	<a href="#">Single-issue questionnaire</a> in Eynsham News to verify that a large (e.g. 750 homes) development should be considered on its merits. <a href="#">CS Support Docs.</a>
Feb – April 2016	<p>Emerging policies correlated with <i>Community Engagement Findings</i> – <a href="#">CS Section 04</a></p> <p>Possible sites assessed against SA Framework criteria – <a href="#">Site Options Assessment.</a></p>
April 14, 2016	<a href="#">Public meeting</a> – continuing to explore what makes Eynsham an attractive place – start using policy headings to check their validity with residents. Results incorporated into ' <i>Community Engagement Findings</i> ' - <a href="#">CS Support Docs.</a>
April - June 2016	Various <a href="#">Community Events</a> strengthen finding but add no extra – data seems complete.
Summer 2016	Draft Policies, Site Assessment and SA put on Parish website and reviewed by WODC/OCC; comments and update actions recorded in <a href="#">Pre-submission Feedback Document &amp; CS 05</a>
late July, 2016	<a href="#">WODC announces</a> Expression of Interest in a Garden Village (GV) north of the A40.
September 2016	September Eynsham News carries <a href="#">questionnaire on GV</a> to all homes with invite to ...
October 5, 2016	<a href="#">Public Meeting</a> helps formulate response to GV proposal – confirms findings of questionnaire and inform update of draft policies and site assessments to accommodate GV idea.
Nov. 19, 2016	<p>Public Consultation on Neighbourhood Plan (ENP) draft vision and policies – results correlated and then recorded in updated <a href="#">Pre-submission Feedback Document</a>; ENP updated</p> <p><a href="#">WODC updated local plan</a> allocates 3250 extra homes to Eynsham – consultation begins</p>
Dec. 12, 2016	Draft Neighbourhood Plan (ENP) <a href="#">sent to statutory consultees</a> and interested parties; residents encouraged to provide feedback through website, facebook and Eynsham News.
Jan. 31, 2017	<a href="#">Six week consultation ends</a> – responses recorded in <a href="#">Pre-submission Feedback Document</a> ; ENP updated; correlation with SA re-checked – update to <a href="#">CS Section 04.</a>
March 7, 2017	ENP and all associated documents prepared for submission to WODC; 'signed off' by EPC.
April 2017	<p>WODC suggests <a href="#">Health Check</a> – completed May 8, 2017</p> <p><a href="#">WODC commissions consultants</a> to say that their own SEA isn't yet valid so an SA Report is required before statutory consultation begins – <a href="#">this document.</a></p>

## 2 Introduction.

### 2.1 Background.

Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan as required by planning legislation and the National Planning Policy Framework<sup>1</sup>. The purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives<sup>2</sup>.

There is no statutory requirement<sup>3</sup> for Neighbourhood Development Plans to be subject to SA as they are unlikely to have significant effects since they must be in conformity with higher level plans, such as the emerging West Oxfordshire Local Plan. However, a qualifying body must demonstrate how its plan will contribute to achieving sustainable development.

In some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental effects, it may require an SEA since the Localism Act 2011 requires neighbourhood plans to comply with EU legislation. This is determined through a SEA Screening process.

West Oxfordshire District Council, as the responsible authority with regard to the SEA Directive & UK SEA Regulations, has determined that the ENP falls within the scope of the SEA Regulations as the ENP has policies which apply to specific sites and is being brought forward at a time when the equivalent documents of the West Oxfordshire Local Plan 2031 have not yet completed their formal examination process and therefore do not yet cover the sites discussed in the ENP. Full reasons are provided in Section 5 of [WODC SA Screening Document](#).

### 2.2 The Eynsham Neighbourhood Plan.

Eynsham's Neighbourhood Plan will set the planning policy for the Parish for 15 years and the buildings themselves are likely to remain part of the village almost indefinitely. Design for the long-term and for true sustainability are a natural requirement for the Plan.

The plan has been developed from inception in October 2014 through to Spring 2017. It covers the Parish of Eynsham which has, during the time of plan preparation had its allocation of new homes increased from 250 to 3250 over the life of the plan up to 2031.

### 2.3 Purpose of this report.

It is a requirement of UK<sup>3</sup> and EU<sup>4</sup> law that the principles of sustainable development be incorporated in all levels of Planning Policy. To ensure this for Eynsham's Neighbourhood Plan, it was decided early in the process that Sustainability Appraisal (SA) could be an important element in creating a robust and objective decision making process to create a viable Plan.

This report summarises the history of and provides a conclusion to the process. Links are provided to the documents on Eynsham Parish Council's website which provide the details which have been summarised here.

### 2.4 Consultation Process.

The first stage of the plan, as set out in the [SA scoping report](#), was the creation of a Sustainability Assessment Framework (SAF – Table 5.2 of [SA scoping report](#)). This was then tested against the input we received from local people as part of the community engagement process that ran from public launch of the Neighbourhood Plan in March 2015 through to pre-submission consultation which ended in January 2017. The process is summarised in Table 1 and described in detail in the [ENP Consultation Statement](#), of which Section 04 documents the correlation between what residents told us and the SAF and subsequent ENP policies.

The SAF is heavily based on that presented by WODC in the original Sustainability Assessment for the Local Plan 2031 at the time of first compilation (Summer 2015). As Neighbourhood Plans should fall in line with the Local Plan, this was considered a sound starting point. We added four additional categories to reflect local concerns after the first consultations.

We may not have adequately captured the importance people gave to retaining Eynsham as a place which felt like a village. SAF 3 includes elements such as the social benefits of a compact, walkable village and

SAF 2 includes 'access to the countryside' . Both of these were identified as essential ingredients in the village feel but they are too diluted by other factors which are less significant to Eynsham within these categories. This does have consequences in the comparative scoring of W1 and W2 as will be described later but we did feel confident in redefining categories already used by WODC.

During the plan process a number of sites were examined with the SAF used to make assessments of how well each site fulfilled the objectives identified in the SAF, based our best judgement of the local situation.

This document summarises what has been done during the preparation of the Eynsham Neighbourhood Plan to ensure it is both sustainable and deliverable while meeting the reasonable needs and aspirations of current and future village residents.

## 2.5 Summary of Sustainability Assessment.

The following table is derived from Table 2.1 of the [SA scoping report](#) and summarises how each stage of the SA process has been completed and recorded for the Eynsham Neighbourhood Plan.

**Table 2 : Sustainability Assessment Stages and implementation progress**

	Sustainability Assessment Stage	How implemented and recorded in ENP
A	<b>Setting the context and objectives, establishing the baseline and deciding on the scope of the SA</b>	
A1	Identifying other relevant plans, programmes and sustainability objectives	Included in <a href="#">SA scoping report</a>
A2	Collect baseline information	
A3	Identify sustainability issues and problems	
A4	Develop Sustainability Assessment Framework.	
A5	Consulting on the scope of the SA to ensure it covers all the significant impacts of the ENP	SAF compared with local concerns and wishes as recorded in <a href="#">ENP Consultation Statement</a> Section 04. SA consultation feedback is noted as 5.3 in above
B	<b>Develop and refine options within the ENP and assess the effects.</b>	
B1	Test the ENP against the Sustainability Assessment Framework	Results recorded in <a href="#">ENP Consultation Statement</a> Section 04
B2	Develop and refine possible options identified in the ENP	Options for sites assessed in <a href="#">ENP Site Assessments</a> .
B3	Predict the effects of the ENP, including the options	Impact of developing particular sites are recorded in <a href="#">ENP Site Assessments</a> .
B4	Evaluate the predicted effects of implementing the ENP, including the options	ditto
B5	Present measures to mitigate any detrimental (e.g. significant negative) effects of implementing the ENP	The policies of the ENP are measures to mitigate the negative impacts of development on land allocated by WODC in its emerging Local Plan 2031
B6	Present measures to monitor the impact of the ENP during implementation.	See Section 5 of this document.
C	<b>Prepare the Sustainability Assessment Report in a form suitable for public consultation, including all reasonable alternatives.</b>	This document. The ENP does not allocate sites as all practical developments sites have been allocated for development in the emerging Local Plan 2031
D	<b>Formal consultation on the draft ENP and its SA</b>	
D1	Allow the public and relevant bodies to	Pre-submission consultation with residents,



	comment on the ENP and on its SA report, gathering additional information through the comments made.	statutory bodies and interested parties took place from Dec. 12, 2016 to Jan 31, 2017 as described in <a href="#">ENP Consultation Statement</a> .
D2	Evaluate the effects of any changes considered appropriate in the light of comments made.	Comments and the subsequent changes to the draft ENP are noted in the <a href="#">Pre-submission consultation feedback report</a> .  A further round of formal consultation will be undertaken by WODC prior to Independent Examination of the ENP.
D3	Make documented decisions on the options and provide feedback on how each comment was taken into account in preparing the final form of the ENP.	
<b>E</b>	<b>Monitoring the significant effects of implementing the ENP</b>	
E1	Finalise plans for monitoring the effects of implementation and comparing them with those predicted.	See Section 5 of this document. It is hoped that Eynsham ,represented by its parish Council, will play an on-going role in ensuring the mitigation of negative impacts through participation in the Area Action Plan process - ENP Recommendation 16A. REC14 K recommends a revision of the ENP if circumstances change – which would be the case if the ENP were no longer achieving its objectives.
E2	Prepare plans for responding to (mitigation of) adverse effects of implementation.	

## 3 Introduction to SA and SEA.

### 3.1 Definitions of SA and SEA.

Sustainability (Integrated) Appraisal(SA) incorporating Strategic Environmental Assessment (SEA) is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform EFSG in preparing the ENP and Eynsham PC as the qualifying body bringing forward the NP; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback from consultation. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the Plan area.

There is a tiering of appraisal/assessment processes that align with the hierarchy of plans – from international, national, regional and through to local. This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that “Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.”

This SA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive. The ENP has been prepared to be in conformity with the higher level plan – the emerging West Oxfordshire Local Plan 2031 (WOLP 2031) – and the assessment is proportionate to the lower level neighbourhood plan.

### 3.2 Basis of the Scoping Report.

West Oxfordshire Local Plan was in preparation when the Eynsham NP process began and it was always understood that the SA and SEA for the emerging WOLP 2031 would cover the Eynsham NP as they would be the 'higher tier' documents covering all sites put forward by the Local Plan.

The evidence base of the ENP included the draft SA/SEA documents for the WOLP 2031, the Eynsham Design Statement (2001), Eynsham Parish Plan (2006) plus analysis of Census and similar official data presented in “Rural community profile for Eynsham” prepared by ACRE for ORCC, November 2013<sup>5</sup>.

The format is similar to that used for WOLP 2031 documents, adapted to our needs

### 3.3 Sustainability Context - Baseline Conditions.

*A summary of the [SA scoping report](#) Baseline Information (section 4.1)*

There are no designated environmentally-sensitive sites within the parish but retaining the existing structure of fields, waterways, hedgerows and trees is important both for wildlife and for the benefit of the human population.

The geology is “Upper Thames Clay Vale” typified by rolling fields, hedgerows and trees. Much of the area is flood zone or otherwise affected by water and watercourses; there are relatively few homes affected by flooding.

Landscape is rolling farmland with a mix of arable and pasture. WODC designates most of the parish as “Eynsham Vale” while an area south of village to the Thames is identified as “Lower Windrush Valley / Easter Thames fringes. North of the A40 the meadows have achieved the status of Site of European Importance for arable plants by careful management.

The village lies on a gravel ridge just north of the River Thames, tightly hemmed in by continuous functional flood plain from the south west to north east with the A40 forming a northern boundary. The village has been intensively developed, doubling the village size since 1960 and filling almost every possible development site. Limited green space within the village is provided by mature trees while easy access to open countryside within easy walking distance compensates for lack of a village green in the centre of the village.

There is a Conservation Area and a range of listed buildings and the site of Eynsham Abbey (founded 1005) next to the Parish Church is a scheduled monument and a further pre-historic site lies south west of the village.

The human population has an 'older' age profile than either the UK or the District generally although health is

generally better than average. Generally there is a good mix of trades and professions among the working population. There is a tendency for younger people to move away from the village when setting up home for the first time due to high house prices close to Oxford.

The village has a good range of shops, pubs, restaurants and cafes. There is also a wide range of sports, leisure and recreation facilities; these physical assets are complemented by up to 90 groups, clubs and societies listed in the Eynsham Directory.

Eynsham is a significant area for business and industry although the Southern Industrial Area has had some vacant premises for a long time. There is a wide mix of businesses, including world class science and engineering companies alongside distribution, light manufacturing and motor trade operations.

Eynsham is well-placed close to Oxford but road connection is via the A40 which is hopelessly congested or via the Swinford Toll Bridge which can have 30-40 minute delays during rush hour. There is a good bus service to Witney and Oxford but this too is affected by peak hour delays.

### **3.3 (a) Sustainability Context – Option of no Neighbourhood Plan.**

The Parish Council considered the merits of having our own plan at a time when the number of new homes proposed by WODC was 250 and there was no perceived threat to the village from excessive development.

It was considered that having our own plan would give us more control over speculative development proposals which had begun to occur. It was decided that the village would do better to take as much control of its own destiny as it could.

By the time the NP was ready, WODC had allocated 3250 houses using every scrap of sustainably developable land in the parish and most people wondered why we bothered but that's hindsight!

### **3.4 Sustainability Context – Neighbourhood Plan Objectives.**

Two spacial issues that dominate sustainability in the parish of Eynsham were noted at the outset – a lack of space within current boundaries and the poor transport infrastructure which limits access to and from the village. These are set out in the [SA scoping report](#) para 1.4 with Baseline Information in section 4.1.

The Neighbourhood Plan identified the need for co-ordinated development of a number of unconnected sites, probably involving significantly more houses than the 250 proposed at the time by WODC to ensure the necessary infrastructure, particularly adequate primary schooling, could be delivered.

Although the A40 was noted as a major problem not only for Eynsham but the whole of the District, we were aware that a Neighbourhood Plan cannot directly improve a pre-existing transport problem. However we were always keen to minimise the impact of development of the A40, particularly at junctions, and to ensure that future upgrading was not precluded by poorly located housing development.

We considered that piecemeal housing development would not provide enough housing for local need. We foresaw a situation where development would be prevented by lack of school places or Primary-age children would have to be bused to nearby villages.

We were, and remain, concerned that the unresolved congestion on the A40 is a major economic and social harm to many Eynsham residents. The Neighbourhood Plan policies and recommendations, if adopted, will minimise additional congestion and allow upgrading of the road in future.

The [SA scoping report](#) Table 1 lists five sustainability objectives. It became clear from the first consultation events that most people were generally very happy with the way Eynsham is now, apart from the A40 and we recognised we cannot remedy the A40 through a NP.

Some effort went into defining what made Eynsham an attractive place. A good mix of people in terms of age, housing types, incomes, a mix of trades and professions all contribute. Easy access to surrounding countryside contributed to a 'village' feel while a comprehensive range of shops, pubs, places of worship, public halls, sports facilities keeps the place very much alive as shown by the list of clubs and societies which currently numbers about 90.

As a result the Vision and the objectives derived from it look to preserve and enhance what we already have rather than look for significant changes. We recognised that Eynsham will have to grow significantly and therefore require policies which will allow the facilities and features we have to 'scale up' to ensure everyone can enjoy what we have now.

The objectives in the NP expanded to seven by splitting Design and Sustainability from Housing as they apply to all aspects of the built environment. An eighth objective was also added following the announcement of the Garden Village (OCGV) to make clear that everything we wanted for Eynsham should be equally applicable to the new settlement.

### **3.5 Appraising the Draft ENP.**

Initially we related the Sustainability Assessment Framework (SAF – Table 5.2 of [SA scoping report](#)) to the comments received back from residents during consultation events.

The results are recorded in the tables of [ENP Consultation Statement](#) Section 04

As the ENP itself was drafted these same tables were expanded to reference individual policies. Thus we have in [ENP Consultation Statement](#) Section 04 a correlation between locally expressed needs and concerns, the SAF and ENP policies.

Initially we started to evaluate possible sites as there was, at the time, some option available to us as to where the new houses should go. We did this by scoring the sites against the SAF criteria as set out in [ENP Site Assessments](#). Scoring takes into account the significance (major / minor) of each criterion as well as its value (positive / negative / neutral) and is generally based on our professional judgement.

Except for objective 17 which is minimisation of the (temporary) impact of construction work on residents, the effects noted are permanent. Cumulative effects are also noted wherever practical.

In the event, the latest version of the emerging West Oxfordshire local Plan allocates every available site so there is no opportunity for the Eynsham Neighbourhood Plan to determine where housing should be located. Instead we used our evaluation of the different sites to inform the development of our policies. The [ENP Site Assessments](#) document forms part of the supporting documents of the Neighbourhood Plan.

## 4 SA / SEA of the Eynsham Neighbourhood Plan.

### 4.1 Compatibility Analysis of ENP vision and objectives.

The following table is derived from Table 1 of the [SA scoping report](#) indicating compatibility with the Objectives and subsequent policies of the ENP

**Table 3: Eynsham Neighbourhood Plan – Sustainability Objectives of the Plan.**

	Objective expressed in SA scoping report Table 1	Compatibility with ENP Section 03 Objectives
Housing	<p>Decide the appropriate number and types of homes required to meet the needs of existing and future village residents.</p> <p>Identify sites with the potential to deliver the homes required together with the necessary infrastructure to support the needs of individuals and the community generally.</p> <p>Create a comprehensive Plan document so that lessons learned in preparing the plan are not then ignored during the development itself.</p>	<p>Housing types: good – ENV1 and ENP1</p> <p>Housing numbers: pre-empted by WODC in allocating 3250 houses to NP area.</p> <p>Identified sites: pre-empted by WODC allocating all possible sites in two SDAs.</p> <p>Infrastructure: good – ENV5 – 7</p> <p>Good – ENP and supporting documents record both outcomes and reasons</p>
Environment	<p>To integrate new development with the design and setting of the existing village.</p> <p>To minimise adverse impacts on people and the natural/historic environment while encouraging access to and beneficial use of the countryside for both residents and wildlife.</p>	<p>Good – ENV2, ENP8, ENP12-15</p> <p>Good – ENV4</p>
Transport	<p>To encourage active mitigation of the current road access problems already faced by residents and businesses to ensure long-term viability of new developments.</p>	<p>Good – ENV5, ENP7 and 9</p>
Economy	<p>To encourage the regeneration of the business and industrial area to the south of the village while ensuring existing businesses thrive and provide work for new residents.</p> <p>To allow for non-traditional housebuilding such as self-build, small-holding and the like to better use the countryside close to the village.</p>	<p>Good – ENV6, ENP10, 11, 15</p> <p>Good - ENP1</p>
Community	<p>To share the benefits of new developments with all residents, recognising that previous piece-meal developments have not always mitigated the full impact they have had on services, particularly schools and healthcare facilities.</p> <p>To ensure that new properties address important issues for existing residents such as an ageing population, more homes for single persons, down-sizers, young people and key-workers from the village forming their first households.</p>	<p>Good – ENV3, ENP3, 6, 8</p> <p>Good – ENP1</p>

## 4.2 Options for Sites.

The assessment of sites was undertaken before WODC allocated all the 2750 homes agreed to meet Oxford City's unmet housing need to Eynsham.

The options considered were for

- development to the west of the village on two different scales with and without a full-length western bypass.
- north of the A40 either with or without a new alignment of the A40.

The results of the assessment can be seen in [ENP Site Assessments](#).

In [ENP Site Assessments](#) Table 1 is our assessment of the significance of each of the SA Framework criteria. The following sections describe each site – all of them very substantial – and record our judgement of the degree to which development on each site can achieve the objectives of the Eynsham Neighbourhood Plan using the methodology set out in 4.2.4. The sites assessed are

Option W1: Development north of the Chil Brook accessed from A40.

Option W2: Larger western development with Link Road between A40 and B4449.

Option N1/N2: Integrated northern extension of Eynsham, north of the current A40, with and without realigning the road itself.

Option N3: Assessment of the proposed Garden Village using the same methodology as other options.

It should be noted that there is an assumption that the policies of the ENP will be implemented, particularly the building of infrastructure identified as necessary, in the scoring given. If the policies of the ENP are not followed then the scoring would probably indicate far less positive results.

In the event, WODC have chosen to include all the possible sites, both west and north of the village, in order to meet their duty to allocate land to meet Oxford City's unmet housing need. As a result the Site Assessments document is offered in support of the Eynsham Neighbourhood Plan but no sites are proposed by the Plan itself.

The assessments are still valid in their own right and have been used in formulating both spatial and non-spatial policies in the ENP as set out below.

### 4.2.1 Summary comparison of sites – west of the village

Both options are substantial extensions into the open countryside and the relatively consistent scoring between the options reflects this. The main differences are

- Scale of road-building required and the degree which the road will intrude visibly into the landscape and affect the amenity of local footpaths and bridleways.
- Loss of biodiversity which is more significant south of the Chil Brook – which is designated as a 'major river' by EA – on land of higher landscape and agricultural value.
- Housing is less easy to screen from the public realm due to both topology and the presence of public paths surrounding the area south of the Chil.

The scoring does show biodiversity and landscape character is better protected by Option W1 but does not take into account the amenity aspects or the need to retain a village feel of which easy access to the countryside is considered significant. It has been noted in 1.4 that SAF 2 and 3 include too many different elements to fully reflect the importance of access to countryside and compact form in creating the village feel so the scores alone do not fully reflect the difference between W1 and W2.

The cumulative effect of the three factors listed above led EFSG and the Parish Council to realise that these are major factors in preferring Option W1 over W2. This is stated in ENP17 which includes the suggestion of a linear park following the line of the Chil through the proposed western development and linking with the historic open-space amenity area of the Abbey Fishponds and on to the playing fields

south-east of the village.

Other aspects of Spatial policy ENP17 are applicable to both W1 and W2 and designed to mitigate the inevitable impact of developing a green-field site which currently provides immediate countryside access for residents of the west side of Eynsham and to prevent unnecessary through traffic affecting the village centre.

#### 4.2.2 Summary comparison of sites – north of the village

Options N1 and N2 were eventually considered as indistinguishable in outcome and are considered as one option. N1 still has the A40 in its current position presenting a definite barrier to successful integration between the existing village and a northern extension with definite negative impacts on both pedestrians (including bicycle and mobility vehicle users of paths) and on local and through road traffic.

ENP policies, particularly ENP16, specify a number of mitigation measures to ensure this barrier is crossed effectively and requires land to be set aside for the road to be realigned in the future. If this is done, there should be no impediment to integrating the north and south parts of the village and the result is functionally the same as N2 which assumes the road is moved before or during the new development.

If the A40 is neither moved nor provided with safe pedestrian crossing points the result will be a major negative impact. There will be even more delays to through traffic on the A40 and an unacceptable and unsafe barrier to proper integration of the village as ENP16 makes clear.

Option 3 is the garden Village much as proposed by WODC in their original Expression of Interest (EOI). If everything is done as set out in the fine words of the EOI, there will be some major impacts due to loss of countryside and effects on historic and economic assets but many of the adverse impacts can be mitigated as set out in ENP16.

However there is much concern that the Garden Village will actually end up as a huge overspill housing estate with minimal infrastructure, dependant on Eynsham but poorly connected to it with private car as the only safe access means.

If the principles set out in the EOI and in ENP16 are implemented as part of the proposed Area Action Plan (AAP), the result could be very positive with the creation of a viable and sustainable new community able to coexist to everyone's mutual benefit with Eynsham as expressed in ENV8 . There would also be the prospect of improving the A40 road to the benefit of the whole district.

But everything has to go right as the AAP is implemented. If any of the issues already raised is not properly implemented major negative outcomes will begin to accrue and the cumulative result will be somewhere between a poorly functioning community down to the overspill housing estate without proper infrastructure, unable to become a community in any meaningful sense, that some people already fear will be the case.

ENP16 tries to address the complex issue of separation and connection in the case of a Garden Village (Option N3). In this case, coalescence with Eynsham should be prevented as the new community should be free-standing and dependence on Eynsham would have a negative impact on both; conversely, sharing facilities will bring positive benefits to both communities and is probably essential in the case of the existing senior school.

ENP16 also addresses the issue of a protected line for an improved A40. While the idea of ensuring 'separation' through expanding the existing A40 to six lanes (dual-carriageway plus bus-lane) may appeal to some, it will not be a satisfactory outcome to those residents of Eynsham who back onto the A40. Spatial policy ENP16 is formulated to address the issues presented by the A40 as a common factor for any development north of the road.

In preparing ENP16 it was noted that options N1/2 and N3 are fundamentally different in concept as N1/2 is an integrated extension while N3 is required to be a fully free-standing settlement which may share some facilities with Eynsham while primarily being self-reliant quite soon during its development. They are also of a completely different scale.

None the less, ENV8 stipulates that the GV should have the same benefits as we identify for Eynsham and thus most of the policies of ENP16 are common to both N1/2 and N3 options and those which are not (ENP16 F and G) are actually reinforcing the objectives of ENV8.

The fundamental differences between N1/2 and N3 are recognised in the supporting reasons section ENP16 1-21 by providing a) and b) paragraphs where the difference between the two options needs to be made explicit. Some paragraphs do not make any distinction and ENP16 22-30 are all applicable to both options as they highlight mitigation issues for the A40.

Eynsham Parish Council and EFSG does not express any preference between N1/2 and N3 as they are so different, fulfil entirely different purposes and will be decided by WODC independently of the ENP.

No particular preference is expressed for N1 compared to N2 as a major realignment of the A40 is outside a Neighbourhood Plan's remit; instead actions to mitigate the major negative impacts of the existing road on good connectivity between north and south are included in ENP16.

ENP16 does indicate a strong desire that the Garden Village, if it goes ahead, should be built out as quickly as possible in its early phases to ensure infrastructure is built during the early stages so that the new settlement is self-sufficient as quickly as possible.

The alternative of building the GV at typical West Oxfordshire rates carries a serious risk that infrastructure will always be inadequate which will be a major negative for both settlements.

#### 4.2.3 Effect of site assessment on non-spatial policies

Site assessment did prove particularly useful in guiding policy formation and the relationship between SAF, local concerns and wishes and the ENP policies are recorded in [ENP Consultation Statement](#) Section 04.

#### 4.2.4 Notes on Methodology Used

Site assessment was primarily based on judgement, often on an 'is / isn't / how much affected' basis. Where possible numerical evidence was used such as walking distances which we compared to available research or guidance which indicate that most people will walk 400m while up to 2000m for commuting or senior-school walks is acceptable.

In other cases existing regulations form the basis, such as the requirement to conserve bio-diversity (NERC Act 2006) and NPPF 109 requirement for bio-diversity gain although it is then a matter of judgement when deciding which option will cause the least negative impact or has the better chance of successful mitigation.

Standards and thresholds based on them have not been able to distinguish between options. Partly this is because the LPA have allocated so much land within the parish for development that our scope for choice is limited. For example, none of the sites appears to have protected species (NERC Act 2006 S41 listed) - although a field adjacent to the OCGV site does. In many cases we expect standards (such as not building in Flood Zones 2/3) to be observed for all options. All the sites affect the traffic problems on the A40 which we know regularly runs at over 100% capacity in places, but, as the total number of houses is fixed by the LPA, this too is not able to be used to make a judgement.

Generally we had to answer the question which we used as the label of Table 5.2 of [SA scoping report](#) - "To what extent does the plan or proposal.....?" for each option based on our local judgement.

Some of the questions we posed to ourselves are interlinked – e.g. air quality and transport (SA 5.2, item 9), health and good countryside access (SA 5.2, Item 2). Links between inadequate services in the GV forcing people to drive into Eynsham so putting extra strains on the already limited parking are also noted.

In general we have noted those matters where there is some difference between options in the associated text which precedes the summary table in each case.s and ENP objectives and policies.

### 4.3 Policy Coverage and Effectiveness.

Table 3 shows broad compatibility between the SA objectives and ENP objectives and policies.



[ENP Consultation Statement](#) Section 04 shows where local concerns and wishes match up with SAF criteria from Table 5.2 of [SA scoping report](#) and are incorporated in one or more individual policies in the ENP.

In this case no distinction is made between major and minor effects – simply that the issue has been addressed in the formulation of policies.

Some issues cannot be addressed by a Neighbourhood Plan as they fall outside its legal scope. In those cases, particularly where a major concern would otherwise remain unaddressed, the NP includes recommendations to the authority responsible - usually WODC or OCC.

Further evidence of the link between feedback from residents and external consultees is provided in the [Pre-submission consultation feedback report](#) which supports the Consultation Statement. This 78 page document records comments received during informal and formal consultations and how concerns were addressed in modifying the Plan.

#### **4.4 Mitigation of negative impacts.**

The primary purpose of the Eynsham Neighbourhood Plan is to ensure that development provides benefit for residents wherever possible.

This may also involve minimising negative impacts and policies have been written with that aim in mind, as is often indicated in the supporting text to each policy.

In assessing site options and overall policy effectiveness we assume that the ENP will come into effect as proposed and that any policy aimed at mitigating harm will be applied.

#### **4.5 Habitats Regulations Assessment (HRA)**

*Text suggested by Enfusion for inclusion in the ENP to address comments on SA made by Natural England.*

In accordance with the Conservation of Habitats & Species Regulations 2010 (the Habitats Regulations), plans and projects can only be permitted if it is ascertained that there will be no adverse effects on the integrity of European protected sites (actual or proposed/candidate Special Areas of Conservation (SAC) & Special Protection Areas (SPA)), and internationally important wetland sites designated as Ramsar sites. Regulation 102 of the Habitats Regulations requires that plans and projects should be screened to identify whether the plan or project “is likely to have a significant effect” on a European site.

The Parish Council’s Strategic Environmental Assessment (SEA) Screening Report (Table 4.1, April 2017) indicated that there was some uncertainty of likely significant effects on areas which have a recognised Community protection status. The Oxford Meadow internationally protected SAC to the east is approximately 3 km from the centre of the village.

Natural England responded to the Parish Council’s SA/SEA Screening Report that the ENP policies relating to development at the 2 SDAs proposed for Eynsham should be screened under the Habitats Regulations. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of the Oxford Meadows SAC.

Of direct relevance to this is the HRA of the District Council’s Local Plan Main Modifications (2016)<sup>1</sup> which investigated the proposed new strategic allocations at Eynsham (EW1a&b) and concluded that for the proposed new Local Plan Policies EW1a & b at Eynsham, issues of recreational pressure, air quality and water quantity and quality have all been considered and likely significant effects on the Oxford Meadows SAC as a result of development under the West Oxfordshire Local Plan proposed Main Modifications will not occur, either alone, or in combination with other plans and projects – subject to recommendations for continued collaborative working on air quality through the Oxfordshire Growth Board. However, this has not yet been tested through public examination for soundness.

The statutory SEA & HRA consultation body Natural England has commented on the SA/HRA of the

District Council's Proposed Modifications to the Local Plan for the 2 Strategic Development Allocations (SDAs) at Eynsham that the impacts of these new allocations on traffic levels on the A34 and air pollution impacts on the Oxford Meadows SAC needs to be addressed. A countywide study to address this issue is being undertaken on behalf of the Oxfordshire Growth Board but the findings of this study are not yet available.

The submission draft Neighbourhood Plan Policies ENV16 (north of A40) and ENV17 (Western Extension to the Village) in the Eynsham Neighbourhood Plan seek to guide development and are aligned with the Proposed Modification Policies EW1a & b (that have been subject to HRA in the Local Plan).

As the Local Plan has not yet been adopted and as the studies for the Oxfordshire Growth Board are not yet published, an additional clause has been added to the ENP Policies at ENP4 J to the effect that "Development should ensure no adverse effect on the integrity of Oxford Meadows SAC in line with the county-wide studies for the Oxfordshire Growth Board." It is considered that this will support the Policies and monitoring in the Local Plan and should confirm that likely significant effects will not occur, either alone, or in combination, on the Oxford Meadows SAC as a result of the Eynsham Neighbourhood Plan.

## 5 Proposed monitoring.

The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action.

Government guidance<sup>6</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MR).

The West Oxfordshire Local Plan Monitoring Report (produced annually), is considered sufficient to ensure appropriate monitoring takes place.

ENP REC14 K recommends that the Plan be revised if there is a significant change in circumstances – this would certainly be the case if monitoring noted that the objectives of the ENP were no longer being met.

## REFERENCES

- 1 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 2 DCLG (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal <http://planningguidance.planningportal.gov.uk/blog/guidance/>
- 3 Environmental Assessment of Plans and Programmes Regulations 2004.
- 4 Strategic Environmental Assessment (SEA) criteria are taken from Annex II of EC Directive 2001/42/EC
- 5 [ACRE](#) - Action with Communities in Rural England; [ORCC](#) Oxfordshire Rural Community Council
- 6 [http://planningguidance.planningportal.gov.uk/?post\\_type=&s=sustainability+appraisal](http://planningguidance.planningportal.gov.uk/?post_type=&s=sustainability+appraisal)