

This is a response by Eynsham Parish Council to the latest Consultation on the Emerging Local Plan by West Oxfordshire District Council

The Parish Council note that there are three documents available for Public Consultation;

- West Oxfordshire Local Plan Allocations Landscape and Heritage Advice
- Peter Brett Associates Note on Housing and Demography in the Burford – Charlbury Sub-Area
- Sustainability Appraisal (SA) Further Addendum Report (Appendix F added 27.11.2017)

At this stage Eynsham Parish Council, (EPC) has no comments to make on the first two documents but would like to make the following comments on the Sustainability Appraisal (SA) Further Addendum Report (Appendix F added 27.11.2017).

West Oxfordshire District Council, WODC, has agreed to support Oxford City by building houses to meet the Oxford City 'unmet need'. The number agreed by the District Councils, Oxford City and the Growth Board for the West Oxfordshire District is 2750, all of which are currently allocated to Eynsham, 2200 in the proposed Eynsham Garden Village (GV) and 550 as part of the urban extension of Eynsham SDA to the west. It should be noted that at no time has there been any consultation with County, District or Parish elected representatives prior to the allocation being made of the GV site. As the decision to site ALL of this unmet need within EPC Parish has been made by WODC it is only reasonable to expect that the evidence used for this decision, the Sustainability Appraisal documents, should be sound and the conclusions drawn from the evidence equally sound.

EPC would suggest this is not the case.

It is worth noting that in the SA document there are continual references to a report, Oxford Spatial Options Assessment Final Report (also known as the LUC). This report did not consider the whole of the site of the Garden Village north of the A40, only the area nearest to the A40 was originally assessed. Neither did this report consider the site of the Eynsham SDA to the west, only a part of it. The assessment of the (Gladman) site at South Leigh/Barnard Gate south of the A40 was equally inadequate. These partial assessments were then used to justify complete sites. The LUC data is therefore seriously flawed.

For the purposes of the consultation WODC have merged two documents, originally presented to WODC Cabinet on 15th November as Appendix 3. These are a short document of 7 pages and a long document of over 470+ pages. The first 7 pages of this SA Document, are a Non-technical summary of the main report. These will be referred to as the 'short' (7 pages, technical summary), and the 'long' (balance of the 480 pages), SAs.

We are surprised that, given the need for these documents to be sound and for the District Council and for yourself to be wholly convinced that they are accurate and unbiased, that a different consultancy was not engaged to give independent consideration of the earlier findings. Instead we find that the original consultancy, Enfusion, have written this new addendum so do not bring a fresh eye to the data, but inevitably will aim to confirm their original findings.

The site selection for a Garden Village

The SA compares three possible, potential sites for the proposed Garden Village.

- The Oxford Cotswold Garden Village, The Eynsham site for a GV to the north of the A40
- Gladman Developments, South Leigh Garden Village to the south of the A40
- Barnard Gate development area to the north of the A40

The Eynsham site for a GV has always been the choice of WODC, who have been given some funds (understood by the Parish Council to be around £200,000) by Central Government via the Department for Communities and Local Government, whilst the Gladman South Leigh Garden Village is a private initiative. It isn't clear where the idea for the other Barnard Gate site north of the A40 comes from as there is no promoter – it may have been the invention of a previous assessment of development potential by Land Use Consultants (LUC).

The selection of Eynsham as a site for a DCLG approved GV is surprising given that the prospectus for *Locally-Led Garden Villages, Towns and Cities* states;

“The garden village must be a new discrete settlement, and not an extension of an existing town or village”.

It should be noted that contrary to the requirement in the DCLG ‘Expression of Interest’ by an authority for a Garden Village; *“Expressions of interest should set how the local community is being, or will be, engaged at an early stage, and strategies for community involvement to help win local support”*, **that at no time prior to July 2016 was any community engagement or consultation carried out by WODC with elected representatives, Parish Council or residents.**

The Eynsham site for a GV (as all GVs) should be 'separate' communities (recognised by giving 'service centre' status in WOLP) therefore the closeness to Eynsham is arguably a negative in discouraging the building up of an integrated and largely self supporting community. (Long report, Chapter 4.8). The relationship between Eynsham Village and the Eynsham GV site was downgraded from 'separate' to 'distinct' at the July hearings but the documents do not reflect this. This downgrading would mean that the Eynsham GV site fails to meet DCLG Garden Village eligibility rules.

The landscape of the two potential sites at South Leigh and Barnard Gate are described as being the same yet they are completely different. The report extrapolated the 'landscape' of Barnard Gate north of the A40 (rolling countryside and parkland) to south of the A40 (flat alluvial floodplain), this appears either inept or biased. This extrapolation implies that the proposed Gladman GV site south of A40 suffers from same de-merits as north of the A40 which is a very different area and the conclusion is therefore incorrect.

In the long version of the SA the Eynsham site for a GV has been refreshed with minor changes. It now notes the presence of historic buildings within the site but gives no indication as to how they would be accommodated into the new development. The SA now notes the level of the flood risk within the site without indicating how this might influence the design of the development.

The SA continues to ignore the noise and pollutants of David Einig's minerals re-processing site at New Wintles Farm within the GV site. As this site has a lifetime operating license from Oxford County Council (OCC) it will either need a buffer zone around it of between 200 and 500 metres or it will require compulsory purchase to remove it at a not insignificant cost (probably multiple £Millions). This compulsory purchase would take a considerable time, effort and cost and would adversely impact the deliverability of housing from the site.

Local information suggests that **the Eynsham site for a GV is in the hands of 12 landowners**, of these perhaps 10 are 'signed up' to the concept and are willing to sell the land to developers, 2 or more are not which means that **WODC would have to rely upon compulsory purchase to complete the project**. Compulsory purchase can lead to significant delays and bring the deliverability of the project into question – a significant factor overall.

Conversely the Gladman GV proposal is in the hands of a single land owner who is keen to see the land used for development. The housing delivery will be faster as a result. We note that two roundabouts, one at each end of the A40 fronting the Gladman proposal will facilitate multiple access to the development site. The A40 road in between the roundabouts is to be 'dualled' as part of the development. The result of this will be a more deliverable site in a timelier manner than Eynsham.

<https://tinyurl.com/GladmanGVplan>

The short version of the SA report confirms the choice of Eynsham for the site of the garden village. It sums up some very complex ranking, 16 individual parameters for sustainability, with a few sentences which in our view merely seek to confirm that Enfusion/WODC had the decision right to begin with.

What is clear is that the Garden Village argument is very finely balanced between South Leigh and Eynsham, right across the 16 sustainability parameters. This does allow WODC to use its 'professional judgement' but they should not ignore critical factors not present in the SA, such as deliverability or the relationship between the existing Eynsham Village and the Oxfordshire Cotswolds Garden Village (Eynsham Garden Village), which contravenes the requirement for a GV NOT to be built onto an existing village but that it should be a satellite of a nearby town as the Barnard Gate GV would be to Witney. The 'father of the Garden Village', Mathew Taylor, would approve of a GV in West Oxfordshire but not at Eynsham.

The SA document sums up the choice of The Eynsham site for a GV over the two alternatives thus;

- **The Eynsham site for a GV is closer to Oxford than the other two sites.**

This is true, but the difference is less than 1 mile.

Location is not a convincing argument to select the Eynsham site.

- **The Eynsham site for a GV has good links to strategic transport improvements.**

This refers to the proposed but not yet confirmed Park & Ride, (Costing £37 Million and providing bus lanes and parking for 500 cars = £74k each) the funding for this is not yet confirmed by the Department of Transport. No other travel mitigation currently exists for this site. The possibility of a bus to Hanborough Station from the proposed Park & Ride seems more important than building houses next to the Rail station itself.

In terms of travel sustainability, the SA fails to mention the fact that both of the other sites are just as close to the main line station at Hanborough as the Eynsham site for a GV.

The Gladman site has been designed to facilitate delivery of houses quickly by offering A40 road improvements along the frontage of the site, this is given no weight in the SA. (para 14.) <https://tinyurl.com/GladmanGVplan>

The Gladman proposal and the Barnard Gate site both offer a short drive to the Hanborough Main Line station for commuters without using the congested A40. This is given no weight as it is omitted from consideration in the SA report. The distances are between 4.3 and 4.9 miles for the three sites.

Travel mitigation is not a convincing argument to select the Eynsham site.

- **The Eynsham site for a GV benefits from 'In principle' support from Government.**

We could find no indication within the document as to what that phrase might mean.

'In Principle support from Government', without substantiation, is not a convincing argument for choosing the Eynsham site.

- **The Eynsham GV site has the support of the Eynsham Neighbourhood Plan (ENP).**

The ENP does NOT support the GV, the ENP just points out the features it would need to have – many of which the current Eynsham GV outline fails to meet. In fact, the GV would fail to meet the Eynsham Neighbourhood Plan requirements for transport and connectivity so should be used against rather than for GV proposal.

The claim of support from the ENP is not a convincing argument to select the Eynsham site.

The Urban extension of Eynsham to the West

The second area of concern for the Parish Council in this revised SA concerns the Eynsham SDA, the proposed urban extension to the village by some 1000 homes of which 550 are to meet the Oxford City unmet need.

Three possible alternatives are considered in the SA document;

- Eynsham SDA 1000 Houses
- Hanborough Station 900 Houses
- Split site Hanborough 450, and Eynsham 550 Houses

The evidence in the long version of SA shows that Hanborough, Eynsham West and the mixed site alternative are all viable.

The short version of the SA report seeks to confirm the choice by WODC of Eynsham West SDA as the site for 1000 homes. There is very strong evidence produced in the long report which would appear to indicate that the best solution is for 450 houses at Hanborough and 550 houses at Eynsham.

The SA report confirms that **“all options are likely to have a positive effect for housing, employment and community objectives”** (para 15). It goes on to state that **“The option for 900 homes adjacent to Hanborough station are likely to have positive effects for transport”**. The SA report does not mention at any time the likely effects of 1000 homes will have on the A40, much less the effect that 1000 homes, plus the proposed 2200 homes in the GV at Eynsham, would have. And yet traffic effects on the A4095 are shown as being a negative for the Hanborough site.

This is either ineptitude by Enfusion or blatant bias, either way it is not a considered appraisal of the sites.

The report mentions that the Eynsham SDA has some Grade 3a soils so development would lead to negative effects compared to the Long Hanborough site that has no high quality soils.

Note that at Para 14 the presence of Grade 3a soil creates a ‘major negative effect’ for North Barnard Gate (Not a WODC supported site) but only a ‘minor negative effect’ for the same soils in the West Eynsham SDA, (a WODC Preferred site). Indeed, the presence of such high quality soil, mostly to the south of the Eynsham SDA reinforces the need to follow the Eynsham Neighbourhood Plan (ENP) and to only develop the west of Eynsham to the north of the Chilbridge Lane.

This appears to be ineptitude by Enfusion or bias, either way it is not a considered appraisal of the sites.

What are the reasons given by the SA report for choosing Eynsham alone?

- The size of the development is sufficient to fund the relief road.
- Proximity to the existing village will assist integration.

The longer report confirms that with fewer houses (than 1000), perhaps the 550 on the Hanborough/Eynsham split site, then the relief road between the A40 and the A4449 “**would not be funded and would not be required**”.

The Parish Council have been unable to establish why WODC feel that there is a definite need for the Link Road. The Parish Council understand that OCC Highways are of the view that 500+ homes could not be accommodated by having one connection with the A40. The Parish Council have suggested that a compromise would be for a connection between the A40, through the 500-600 houses of the SDA, to the B4449 could be acceptable as long as it was designed from the outset as a 20MPH ‘Street’ with traffic calming so as to preclude its use as a link road/rat-run and to fit with the intended 20MPH speed limit proposed for the rest of the village. The Parish Council plans for the 20MPH speed limit are well advanced. The nature of the proposed road between A40 and B4449 was discussed at the ELP hearings in July and again at a meeting with WODC Officers and Elected members on 30th October.

This proposed A40/B4449 road has another problem. If the plan for 1000 homes was carried through then about 200-250 of these houses would need to be built on the south side of the Chil Brook, against the wishes of the Eynsham Neighbourhood plan, and these homes would bear most of the cost of a crossing for the Chil Brook/River, this might well impact the viability of these homes so making the 1000 homes impossible to deliver.

The size of the development being ‘sufficient to fund the relief road’ is not a convincing argument to select West Eynsham as a site for 1000 homes.

The SA report cites that the Eynsham option would give better integration with the existing community. The facts show a different situation, the Hanborough site is 1.54 KM from the Hanborough village centre (Co-op roundabout), the Eynsham SDA is 1.4 KM from the Eynsham village centre, the High Street Co-op. A difference of 104 metres. This does not appear to be sufficient difference to base a decision in favour of the Eynsham site.

The proximity to the existing community is not a convincing argument to select West Eynsham as a site for 1000 homes.

Conclusion

This SA report has a large number of inconsistencies. Rather than using analysis of data it reverts to making subjective judgements based upon data that reflects the report author's preferences rather than solid fact. The number of omissions and double standards is unacceptable. That a type of soil should cause a 'major negative impact' on one site but the same soil quality cause only a 'minor negative impact' on another site shows either ineptitude on behalf of Enfusion or blatant bias. That a site of a maximum 900 houses should have a negative impact on traffic whilst a site of 1000, feeding into the congested A40, should have no mention of traffic impacts is once again a cause for concern.

As we stated at the outset in our comments on this SA document - "the Sustainability Appraisal documents should be sound and the conclusions drawn from the evidence equally sound" – clearly our response suggests that neither the evidence or the conclusions are sound. Ideally this SA should be rejected as unsound and a new consultancy be appointed to review/rewrite it, the sites at Eynsham should be removed from the WODC ELP as a major change and substitute sites, available in Hanborough, South Leigh and Carterton to name but three, should be re-considered.

Eynsham Parish Council, December 2017