

Position Paper for Eynsham Parish Council for consideration on June 6<sup>th</sup>, 2017.

- *prepared by Richard Andrews as a discussion document, May 29<sup>th</sup>, 2017. This paper sets out a number of issues and suggests some possible approaches for the written and verbal submissions to be made on behalf of the Parish Council at the Stage 3 Examination in Public (EIP) of the West Oxfordshire Local Plan 2031.*
- *This paper is a personal opinion which does not represent the considered view of Eynsham Parish Council. Following discussion, the draft of a written submission will be prepared and circulated to councillors; it needs to be submitted to WODC before June 12<sup>th</sup>, 2017.*
- *This paper is accessible from the Eynsham Parish Council web-site as part of the agenda for the meeting on June 6<sup>th</sup>, 2017 which is, as always, open to the public. Members of the public may make representations at the meeting in accordance with standing orders or send written submissions to the Parish Clerk.*
- *To make sense of the 'matters' referred to in the text, please see <http://eynsham-pc.gov.uk/variable/organisation/173/attachments/Stage3Matters.pdf>*

### **How about something positive?**

#### **How about EPC propose to WODC that we start working together now!**

WODC insisted that 'they had worked with EPC' when the Examiner asked them at the last hearings. Technically they were not lying because they have spoken with us last year but they have most definitely not fulfilled their 'duty to work with a “qualifying body” who brings forward a NP while their local plan is still not made' and haven't spoken meaningfully since December 5<sup>th</sup>, 2016. Starting to engage with EPC and OCC together with developers will be a positive move for WODC before the next round of EIP hearings.

We will start our submissions by saying that they have not and are not fulfilling their duty and were being very economical with the truth in answering the examiner's question at the last hearings. They may prefer to be seen to be co-operating.

The examiner made it clear that there is a delivery issue – at the very least a problem of credibility as far as the number and timing of houses is concerned.

Eynsham is absolutely key to delivering the extra houses – over half the new houses allocated in the 'new' version of the plan have been located in Eynsham.

Ideally there should be two or three meetings before the mid-July hearings. It would be good to be able to show :

- outline plans – including how GV fits with existing homes/businesses on site
- outline 'key issues' – for us and for them
- outline statement of common ground – there will be some

*Clearly these will be closer to sketches than plans but it gives us an opportunity to engage with WODC. It is also very much what we have wanted – one overarching body to consider the common elements between the two development areas and the A40 with which they are inextricably linked.*

**What do we gain? There is a desperate need for proper co-ordination, particularly regarding the A40. We have very good working relationship with one developer but not with WODC or OCC when we could all help each other.**

**Just a thought as an alternative to letting things take their contentious course through EIP....**

*Suggestions for our submission to Stage 3*

**Matter 14: Eynsham – Woodstock sub-area allocations.**

**This is a summary of the potential issues, principles and possible objectives for the submission.**

What do we want to achieve?

- Fewer houses allocated to west Eynsham to give us some space for good design, maintain good links to countryside for the existing residents.
- Improvement to the A40 congestion and not make it worse.

What do we fear for west?

- A constricting urban band round the west of the village
- loss of a really good circular walk which is countryside now and will become urban
- a new school will not materialise
- medical centre will not cope
- traffic will rat-run through the village via Thornbury Road

What do we fear from the GV?

- Traffic gets worse
- facilities/infrastructure never keeps up with housing – becomes dependent on Eynsham with resulting extra care journeys and pressure on out facilities.
- Services such as medical centre move to new location.

What do we want from GV?

- Balance of separation (no coalescence) but non-car links to share facilities.
- Maintain balance in infrastructure between settlements.
- Fair treatment for people affected by proposals near their homes and businesses.
- Compensation for loss of biodiversity
- improvement in A40 situation

Do we prefer GV and 2500 houses or integrated development with 800-1000?

Do we just say 'NO' – to which do we say 'no' to, west or GV?

Should our intent be to bring down the WOL Plan, or at least get it delayed so long that Gladman will get their GV going first and take pressure off us?

**What is wrong with the Local Plan as currently proposed? What points will we make? These are some of the points we can make – we need to be sure they accord with our objectives listed above.**

Far too high a proportion of the extra homes, added since the plan was kicked back last year have gone to Eynsham. The sole justification is that this is to meet OC need and we think it totally irrational that all the OCUN want to live in one place without any choice and that they need to live in groups of 500 or more to feel safe from the predations of country folk!

This does matter because so many allocated to Eynsham with limited time to build houses means so many have to go to the west that it will become a poorly designed and poorly integrate urban sprawl, entirely surrounding the west of the village with another layer without any opportunity for good design and proper blending into the countryside.

If all 550 OCUN homes have to go to west Eynsham, then most of Eynsham's need should go to Carterton – who want the opportunity to have more homes. This actually represents reality as most people starting out cannot afford Eynsham and Carterton offers them the only prospect of buying a home of their own within the borders of Oxfordshire. *We will make this comment to **Matter 12** which relates to Carterton and to **Matter 11** relating to Witney where other OCUN people could equally prefer to go for a 'town' environment.*

#### 14.1 What are the Examiner's concerns (wording added from NPPF 182)

- Positively prepared – *the plan should be prepared 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 – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*
- Effective – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities*

Main concern about 'positively prepared' is not housing levels but the supporting infrastructure. The A40 is already running over capacity and removing 500 cars per day is hardly going to cover the increase in traffic generated locally, let alone the 15,000 new homes built in district as a whole. The A40 should be seen as a 'cross-boundary' strategic priority so OCUN can get to Oxford once they move out here; without some visible efforts at collaboration with OCC, WODC are not presenting a positively prepared or deliverable plan. Eynsham's NP with its emphasis on reducing junctions and leaving a protected route for an upgraded A40 are far more realistic in approach. Justification requires consideration of reasonable alternatives, based on evidence. We note that the consideration of an alternative site at Barnard Gate, which was otherwise rated the same as North Eynsham, was dismissed out of hand because it was a kilometre further from Oxford along the same road – a matter of a few minutes travelling time on a normal road. The wording of the dismissal of this site even indicates a degree of 'preference' which is inappropriate in such an important situation.

The option of an alternative site on the other side of the A40 was never considered even though it is perfectly reasonable (as a proposal has been made); to dismiss it now that it has been made, out of hand is irrational and unjustified, leaving WODC open to challenge when they could and should have prepared a proper argument for and against. This is further evidence that WODC is prepared to make decisions on a whim rather than fully justified ones, bringing all decisions into disrepute. If there are two possible GV developments with 2 km there absolutely must be a proper sequential assessment of the merits of the two sites and any other options for the two sites. Promoting one and dismissing the other, without reasons, just because you thought of the first and not the second is no way for an LPA to act.

Plans assume typical WODC build-out rate for GV – this cannot deliver enough houses and definitely won't deliver infrastructure either. Dooms project to failure (and increases pressure to build more to the west to fill in the 'delivery gap'). Need to show how they are going to do something different – more of the same is not good enough to demonstrate that the plans will be effective.

14.3 clearly we don't think allocating 1000 house to west Eynsham is soundly based. We are not at all sure that the houses can be delivered at all, let alone in 5 years. There would have to be 4 sites working in parallel to meet this target and there needs to be substantial infrastructure in the form of a link road.

We don't think a link road is deliverable in this time, if at all given the extra costs. A more modest scheme, in keeping with the nature of this location, will be deliverable and will not cause the loss of local amenity and bio-diversity that the link road and its 250 extra houses will bring.

The 1000 figure is based on two criteria which we do not consider are justified or will be effective:

- the allocation of OCUN in quanta of 500+

- traditionally low build-out rates on GV site

we have already argued that these are unjustified and will render the GV development ineffective in that it won't deliver the necessary infrastructure in a timely manner

## **Matter 16 – 5 year land supply – this is an outline draft of EPC written submission.**

### 16.1

Allocating Oxford City Unmet Need (OCUN) separately allows WODC to push the majority of the 'new' housing requirement to the Eynsham-Woodstock sub-area on the grounds of closeness. It also allows Oxford City (OC) to insist on large quanta of housing wherever OCUN is being allocated. West Oxfordshire offers a good mix of town and village locations yet this approach locates all the OCUN in one location at the highest price bracket. There is no intention to operate parallel OC and WODC housing lists so the proposed separation of need is of no practical benefit to OC 'refugees'.

The approach taken does create serious disbenefits in that it forces more homes on Eynsham due to the irrational insistence on large 'estates' for OCUN which will actually be occupied by anyone without discrimination so OC insistence on it is absurd.

While there is an obvious and justifiable reason for locating some/most OCUN housing close to OC, the artificial distinction between the two 'needs' drives perverse and irrational outcomes and gives OC 'control' over areas where it does not have any jurisdiction.

### 16.2

It might be more reasonable to ask if there is any deliverable alternative which doesn't 'back-load' delivery to the latter years of this plan!

Certainly, in the case of a new settlement, there does need to be planning ahead but we argue that a radically different model of delivery is essential both to ensure that a critical mass builds up to support infrastructure provision and to meet the need for housing.

WODC and the developers supporting it have a very poor history of delivery and it would be foolish to expect the same people and process to bring about a different outcome. Instead a different approach and different developers should be used, focussing on using factory built homes – there is a company in Witney that makes them already – and emphasising the building of building non-market housing without the 'slow release' policy adopted to keep prices high. This should be part of the remit in drawing up the masterplan for OCGV.

EPC strongly supports the setting up a mechanism to co-ordinate development north, south and of the A40. It is shocking that such a mechanism is not in place, probably because WODC and OCC are at political and personal loggerheads over unitary status.

It is quite clear that WODC is dragging its feet over developments west of Eynsham so they can foist pet projects like the Link Road on developers while waiting to set up two independent SDA zones when this plan is adopted. There are compelling reasons to set up a mechanism for co-ordination and oversight on a parish-wide scale immediately.

### 16.3

(a) EPC comments to the WOLP consultation noted the surprising absence of adequate reserves making under-delivery highly likely.

(b) Growth is highly concentrated in a way that would not be sustainable if perpetuated in future local plans. EPC also has serious concerns about extending existing communities, apparently indefinitely.

It is a vital principle of the Eynsham NP that a village community works best when people naturally walk to shops and schools and, in doing so, meet and interact with their neighbours. Eynsham works well with 2000 homes and might just be able to work up to 4000 homes but even then there will be more than one primary school and the concept of one community will start to be diluted and going beyond that makes a village into a town (albeit without a town charter). We are aware

that other villages are linear in form and are no less communities but engagement work for the ENP convinces us that the nucleated model works best for larger villages and should be the model adopted where possible.

On this basis, many Eynsham residents see the Garden Village model as attractive although we have noted an increasing number of concerns which make the currently proposed location rather less easy to deliver than WODC's EOI makes out. None the less, in principle, building new communities of 2500 to 3000 homes, when done well, could bring significant benefits all round and could be a better solution than continually extending existing towns and villages.

Some concerns over the OCGV location would also apply to over-extended settlements and indicate the need to limit coalescence while not preventing mutual co-operation.

Concern about the ability to deliver enough homes in the short term (5 years) is a real one, born out of poor planning over recent years. However, it would be simply compounding this negative situation if a series of rash and ill-considered decisions were forced on West Oxfordshire either through the Local Plan process or through opportunistic developments resulting from the lack of Local Plan.

Clearly WODC have a trust deficit to overcome to convince anyone that they will 'do better next time'. There must not only be a clear plan but a monitoring mechanism to ensure the plan remains on track, particularly with large strategic sites.

The benefit of new settlement development has been mentioned already and therefore EPC is in favour of some reliance on large sites. However, there is a drift to 'everything must be an SDA' at Eynsham which does not adequately distinguish between a substantial but organic extension and a new community.

The NP strongly recommends one masterplan to integrate sites to the west of Eynsham and we have already stressed the immediate need for co-ordination of this area with the A40 and the new settlement. However, we question the designation of SDA for west Eynsham where substantial sites are already being brought forward naturally and where the imposition of an SDA may slow rather than accelerate delivery where the need is to co-ordinate *and do it now*, not in many months time as part of an imposed SDA.

There will be reliance on post 2021 delivery but, as noted before, there are ways to ensure that delivery does become a reality. Setting a 2012 start date may be realistic in one way but it also becomes a self-fulfilling prophesy and must never be an excuse to put things off a bit longer. This includes delivering the extra 2750 homes to help out Oxford City which will require more than 'business as usual' and for which an SDA or AAP is appropriate and probably essential.

WODC must exercise discretion, using light touch (proper co-ordination to west of Eynsham) and heavy hand (SDA/AAP for GV) as needed to achieve the necessary outcome required for each situation.

*The inclusion of C2 (Care Homes) does suggest a certain degree of barrel-scraping which in turn indicates a lack of confidence in the deliverability of the plan. There is a well-attested need for homes to down-size into, typically only two bedrooms but somewhat larger rooms than typical starter homes and the need for extra-care accommodation is noted in the ENP. Perhaps it is a case of 'every little helps' in making up the housing numbers....*