

December 2012

WEST OXFORDSHIRE DRAFT LOCAL PLAN OCTOBER 2012 CONSULTATION



1. This is the response of Eynsham Parish Council to the Draft Local Plan consultation.
2. The Parish Council broadly concurs with the Draft Local Plan (DLP) with the following comments and exceptions.

Eynsham – Woodstock Sub-Area

Housing

3. Of the rural service centres identified in Core Policy (CP6 et. sec) and CP34 for the delivery of 450 new homes, Eynsham has already been the site of the majority of housing development in this Sub-area since the beginning of the consultation to replace Local Plan 2011.
4. In addition to Swinford Green (100) and the Rural Exception Site of Merton Close (40) new homes have been built or planning consent granted at Blankstones Farm (8), Abbey Farm (7), Abbey Farm Barns (8), Star (9) and Spareacre Lane Works (12). A development of 13 homes at 17 Mill Street is pending. Various other infill homes have also been built or have consent.
5. It is estimated that together these developments match or exceed the Affordable Housing levels proposed in CP8.
6. Given the above level of development in recent years, the Parish Council objects to the significant shift in District Council policy for development affecting Eynsham.
 - (a) In the Local Plan 2011 Housing Policy H1 states that dwellings should not 'erode the character and appearance of the surrounding area', and H7 restricts development in service centres, such as Eynsham, to rounding off which 'would not extend that settlement into open countryside ...'
 - (b) The 2010 Core Strategy: Preferred approach said, at 4.14, 'Any further substantial development to the west of Eynsham (the fourth largest settlement) is unacceptable primarily because of traffic impact upon the internal mediaeval streets and surrounding congested road network (A40 in particular) as well as impact upon rural character; expansion in other directions is not a sustainable option (Green Belt, flood risk, mineral sterilisation, etc.)'.

(c) The 2011 Draft Core Strategy abandoned this express approach in favour of a more unspecific policy, CS2, for six identified rural service centres, including Eynsham, 'Suitable for development of an appropriate scale and type that would help reinforce the existing service centre role. This may include specific site allocations to be identified within or on the edge of some of these service centres,' and 'on land within existing built-up areas of towns and villages [and] on land adjoining a town or village where the proposed development would meet specific local needs that cannot be otherwise met.'

(d) The DLP 2012 now states, at 9.111, 'At Eynsham there is some scope for further development within the existing built up area and on the fringe of the village'. While CP34 reiterates the Core Strategy with development 'of an appropriate scale and type that would help reinforce the existing service centre role' it also says that development should be consistent with 'protection of the Oxford Green Belt' and 'avoiding development which will increase the risk of flooding...'.

7. Of the three rural service centres in the Sub-area, Eynsham has become the most impacted for development purposes.

(a) To the east, the village has been developed to the boundary of the Oxford Green Belt at the B4449 (CP34).

(b) To the north Eynsham is bounded by the A40. The Parish Council agrees with the assessment of the Strategic Housing Land Availability Assessment January 2011 (SHLAA), at 1.9, that 'New development beyond the A40 would be poorly related to the village structure' and crossing the A40 for pedestrians and cyclists 'still remains inconvenient and dangerous' (also CP2(6)). This is reinforced by the District Council's expressed strong opposition to new development in the area.

(c) Development to the south is restricted by the Thames and Chil Brook Flood Zones 2 and 3, (CP2(6) and CP34), industrial and office sites, including Oasis Park and the Oakfield Industrial Estate, and a large area of Scheduled Ancient Monument (CP23).

(d) The Spareacre Lane Works site (SHLAA Site 206) and 17 Mill Street (a windfall site) are the only significant sites within the existing built up area available.

(e) Of the remaining sites to the west of the village identified in the SHLAA 2011, The Parish Council agrees that the present inadequate road structure presents a significant barrier to development (SHLAA 2011, at 1.21; Core Strategy: Preferred Approach 2010, at 4.14.) The Parish Council also agrees that development into the open landscape, which is also Grade 3a

agricultural land, would destroy Eynsham's village character and its relationship with the surrounding countryside (SHLAA 2011, at 1.20 and CP2(6)). More specifically:

- (i) Site 180, adjacent to Fruitlands, was the subject of an extensive consultation by the owner, J.A. Pye (Oxford) Ltd, and the Parish Council with no positive support at all for development.
 - (ii) Site 187, off Old Witney Road, has previously been refused development consent for housing, but has been granted consent for a re-developed garden centre.
 - (iii) Site 223 consists of playing fields for Bartholomew School. The school is in the process of increasing use of this as part of a development of sport and recreation facilities. This is with the assistance of the Parish Council, which objects to any other development use of the land as contrary to DLP 7.23-25 and CP19 and government policy of increasing sport in schools.
- (f) Given that the congestion on the A40 has such an effect on potential development in Eynsham, this should be given the status of a material consideration in any future planning applications until the District Council comes to grips with the problem (see comments 14 and 15 below).

8. During the Draft Core Strategy consultation the Blenheim Estate proposed development of Estate land in Woodstock and Long Hanborough in order to assist the maintenance and preservation of the Blenheim Palace World Heritage Site (Summary of Consultation Responses). The Parish Council supports this initiative (particularly as Long Hanborough has the benefit of a rail connection) to the extent this is compatible with CP23 and CP34.

9. Generally, The Parish Council supports the LDP policies concerning housing, including CP3-Prudent use of Natural Resources (including sustainable design and construction); CP4-High Quality Design and CP7-Type and Mix of New Homes (particularly extra-care housing in service centres).

10. The Parish Council also supports CP20-Decentralised and renewable or low carbon energy development, and would wish to see greater integration of this policy with housing policy CP3. This should include a requirement for developers of 10 or more dwellings to provide (as in CP3) a robust assessment that has been independently validated to demonstrate why it is not feasible, viable and deliverable to secure a maximum of energy from a form of communal energy generation and/or decentralised and renewable or low-carbon sources (see also DLP 7.29).

Employment

11. More emphasis should be given to the fact that Eynsham is an important employment site, in the Sub-area, District and region. It not only includes Siemens MR Magnet Technology and Oakfield Industrial Estate (DLP 9.97) but is second only to Witney in the

District for employment floorspace for offices, factories, workshop/vehicle repair and warehouses (1.4m sq ft/130,160sq m – West Oxfordshire Economic Study June 2007). However the West Oxfordshire Commercial Property Register for November 2012 lists over 138,234 sq ft (12,842 sq m) being available. This is a rise of 4.6% since February 2011.

12. While the Parish Council supports CP11, more emphasis should be given to support and development of existing business sites in rural service centres and villages (DLP 6.15) rather than focusing on providing additional land for business, primarily in the main service centres.

13. The Parish Council wishes to see the promotion of local jobs for local people to increase the sustainability of the village (Core Objective 8), reduce commuting (CP24) and to prevent Eynsham from becoming more of a bedroom community for Oxford, Witney and London that it already is.

Transport

14. Eynsham is the one village most directly affected by the congestion problems on the A40 between Witney and Oxford. This not only impacts on the life of local residents but also the delivery of goods and services to and from Eynsham's business community. The Parish Council is concerned that there is no mention of this in CP34.

15. While a solution to the A40 congestion between Witney and Oxford and the problems of Wolvercote and Cutteslowe roundabouts presents a multi-authority and funding problem, the Parish Council would wish to see a greater commitment from the District Council than just acknowledgements of the difficulty (DLP 6.7 and 6.9). The District Council should commit to taking a leading role in this problem which significantly affects the District east of Witney, as encouraged by the National Planning Policy Framework (NPPF), at 31.

16. The DLP (at 9.102, also Draft Infrastructure Delivery Plan 2012 (IDP) at 4.46) repeats the long standing idea of the possibility of a park and ride site at Eynsham. However, the Oxfordshire Local Transport Plan 2011 (LTP3), at 18.22 merely refers to 'investigating further the remote park & ride concept at Eynsham', 'When resources and opportunities allow....'. The Parish Council supports the District Council proposal for a park and ride in the Shores Green area (CP28(e)-East Witney Strategic Development Area) as a more realistic and deliverable site which would also be of benefit to Eynsham as well as Witney.

17. To enhance cycle routes in the Sub-area (CP24 and CP34) the Parish Council would encourage the District Council to actively work with and encourage the County Council and Vale of White Horse to deliver a strategic cycle route between Eynsham/Swinford Bridge and Botley/Oxford via the B4044 (DLP 8.29, LTP3 28.18, NPPF 31).

Environment

18. The Parish Council supports CP21-Flood Risk. It is regretted that the West Oxfordshire Strategic Flood Assessment April 2009 was not adequately completed in Eynsham, particularly in East Eynsham. Consequently this should not be entirely relied upon when assessing future development sites. A Flood Risk Assessment should be required in possible at-risk areas to a greater extent than the 2009 report or CP21 would indicate.
19. Eynsham is directly under the flight path of RAF Brize Norton and subject to the greater noise pollution created by the increasing use of the base (DLP 7.49). The Parish Council supports CP22-Environmental Protection, and in particular agrees that housing and other noise sensitive development should not take place in areas where the occupants would experience significant noise disturbance from existing or proposed development.

20. The Parish Council supports the District Council policy on minerals (DLP 7.53) that other extraction options closer to planned growth sites should be more fully explored.

Infrastructure

21. The Parish Council is concerned about the lack of consideration for healthcare facilities in the Sub-area. DLP 4.25 states social infrastructure includes healthcare. CP15 states the Council will promote the development and retention of local services and community facilities which, at DLP 6.40, include doctor's surgeries and health centres. Working towards improving access to services is listed as Priority 1 in the West Oxfordshire Health and Wellbeing Strategy 2009-2011. CP25-Witney Sub-area Strategy states the strategy includes 'ensuring that new development makes appropriate and timely provision for necessary supporting infrastructure, including...health'. However, there is no mention of healthcare in any other sub-area Core Policies, including CP34.

22. Eynsham and the surrounding district rely on one surgery/health centre located opposite the District Council's car park. While recently improved and expanded, it is being put under pressure from the increase in population in Eynsham, forcing some residents to travel to the surgery's branch in Long Hanborough. This has occurred because it appears that, in none of the developments mentioned in comment 4 above, has the provision of healthcare for the future occupants been a consideration. Healthcare should be included in CP34 and all Sub-area Core Policies and in practice be a material consideration for consent to any future development.

23. The Parish Council is also concerned about the complete lack of reference to foul and waste water infrastructure in the DLP. There is only an incorporation by reference in CP5-Supporting Infrastructure, which says this will include items identified within the IDP. The IDP, at 5.14, states 'As water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection to its [sic] network ahead of infrastructure upgrades,

they rely heavily on the planning system to ensure infrastructure is provided ahead of development ...'

24. In early 2012 Eynsham experienced a sewage blockage, caused by excess waste water contents, adjacent to the Swinford Green development. Thames Water was required to deal with it on an emergency basis. This revealed that the whole of Eynsham's foul and waste water drainage system flows to the Thames Water sewage network through one pipe system down the Bitterell footpath and under the B4449 bypass. This was constructed many years ago and not only all the development referred to in comment 4 above but many prior developments have subsequently been connected to it.

25. Thames Water is responsible for foul drainage in the District. The IDP relies on the Thames Water business plan 2010-2015 which, while it makes projections for future upgrades, will not cover the lifespan of the DLP. The IDP only refers to upgrades required or planned in Witney and Carterton, with no mention of any other towns, villages or rural areas which have already undergone significant development.

26. While CP5 refers generally to future provision being secured through planning conditions, planning obligations and/or Community Infrastructure Levy, foul and waste water infrastructure should be expressly included in the DLP as a material consideration with drainage strategy statements being required for all new development.

27. In accordance with Core Objective 6, it should be ensured that land is not released for new development until the supporting infrastructure and facilities are secured.

Conclusion

28. The DLP represents an improvement over the Core Strategy with more defined guidelines. However, it appears to show a lack of commitment where delivery requires co-operation with other authorities. CP2 provides a general policy for locating development in the right places, but the rest of the DLP still leaves gaps and uncertainty in how the distribution of this development and the provision of the necessary infrastructure will be accomplished.