

## Template response letter to the WODC Garden Village Area Action Plan Issues Paper - deadline August 3<sup>rd</sup> 2018

### Advice for using this template letter

West Oxfordshire District Council are currently in a '[consultation period](#)' for the proposed Garden Village situated across the A40 from Eynsham.

This consultation period ends on Friday 3 August 2018, and all responses to WODC's plans need to be submitted by that date.

We are aware that many local residents are interested in replying or writing to WODC, but may have difficulty finding the time to read the [70-page document](#) in depth.

The Eynsham Planning Improvement Campaign group (EPIC) has compiled the following response letter which takes into consideration feedback from the local community, and addresses most of the major issues raised.

You are welcome to send this letter to the Planning Policy group at West Oxfordshire District Council, but we would encourage you to copy it into Word, and add your own thoughts and views to personalise your reply, as individually crafted letters will likely carry more weight with the council.

Also available are the "[Six Points to Consider](#)" and "[Ten reasons why the Garden Village is bad news for Eynsham](#)" documents if you want more information to help you write your own reply.

When submitting your response to the consultation please be sure to sign and date this as well as include your postal address.

Send your letter as soon as possible to Planning Policy, West Oxfordshire District Council, New Yatt Road, Witney, OX28 1PB – **it must arrive by 5pm on Friday 3 August.**

You may also submit your response by email to [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)

Planning Policy  
West Oxfordshire District Council  
New Yatt Road  
Witney  
OX28 1PB

planning.policy@westoxon.gov.uk

Dear Sirs/Madams;

This letter is in response to the *Oxfordshire Cotswolds Garden Village Area Action Plan (AAP) – Issues Paper* consultation; as you have outlined in the document, “we will accept any form of written correspondence” so I wish to clarify that this is the purpose of this letter.

Due to the complexity and length of the document, and the large number of issues raised, many local residents have spent considerable time assisting with responses to the consultation, therefore many of the points I will raise may be similar to other submissions you will receive.

Because of this I also wish to clarify that the views and opinions expressed in this letter are my own, should be treated as a separate and unique response to this consultation, and given the same weight as any other individual submission.

I object to the development of the *Oxfordshire Cotswolds Garden Village* as it is outlined because I feel many significant issues have not been addressed, or that statements in the Area Action Plan (AAP) such as “provisions will be put in place” do not actually define or explain how multiple issues will be handled. This shows a lack of understanding or acknowledgement of the local residents’ concerns that have been voiced up to this point, and of the development process as a whole.

*Oxfordshire Cotswolds Garden Village* as defined ignores many of the guiding principles of the Garden Village (GV), most clearly that it should “be surrounded by a permanent belt of agricultural land.” GVs are supposed to be entirely separate, self-sustaining, and not dormitory suburbs. The land designated is 100 metres from Eynsham and is designed to shoulder the burden of Oxford’s housing needs; both in direct conflict to the idea and concept of a GV. The development should therefore be proposed as an “Expansion of Eynsham” and not a GV, and be funded by means other than the UK government’s GV grants and incentives.

The AAP does nothing to avoid loss of valuable farmland and biodiversity, or to prevent harm to heritage assets. While the APP speaks of a “net gain” in green spaces and biodiversity, it does not acknowledge the required destruction of existing and established spaces and ecology that have been built up over centuries.

The land north of Eynsham has areas of “best and most versatile” agricultural land thanks to decades of non-intensive farming, and a particularly rich mix of habitats and wildlife. The fields around City Farm are the most special being part of the Site of European Importance.

City Farm Listed (Grade 2) Buildings need a generous area of open farmland. Planning Inspector WG Fabian on 16 May 2016 decided to dismiss an appeal against refusal of planning consent for a development of 49 dwellings on the Litchfield Land off Station Road, Eynsham as the whole site was

considered to be part of the setting of the Listed (Grade 2) Abbey Farm Barn. From the barn to the furthest boundary of the Appeal site is a distance of 400m or more, establishing a precedent of a sufficient 'protective radius' in the Parish.

The site of Tilgarsley Deserted Medieval Village needs archaeological investigation and conservation. Its setting with medieval field systems needs protecting as well within this established 400m radius.

The ancient trackways the Salt Way running north/south and the boundary track running east/west need protection with bands of green space on either side.

These should be exempt from development.

Furthermore, there will be an increased risk of flooding in the area. Part of the proposed GV site floods regularly, and there are defined areas of flood risk already present in Eynsham. Urban development on a large scale will also increase the risk of flood water being diverted towards Eynsham. While the AAP states that flood mitigation will be 'carefully considered', it does not explicitly detail how this will be achieved.

The AAP does not clearly or adequately address what may be the biggest concern for this site – or for other future development sites in the district – which is the need for adequate transport.

The heavy impact on the transport network, especially the A40, of the building of 2200 homes combined with 1000 homes to be built on the west of Eynsham and other developments further west in the district must be addressed in a more comprehensive and meaningful way than demonstrated at present.

The A40 corridor serves Eynsham, Witney, Carterton and the settlements of West Oxfordshire. The proposed GV and the strategic development of West Eynsham must be considered with the proposed growth along this corridor and with Oxford North (Oxford Gateway).

It is worth highlighting that Witney is the only Growth Town without a rail or segregated busway connection to Oxford. This should be addressed as a priority in the AAP.

The proposed Park and Ride at Eynsham and bus lane are insufficient for current and future travel demand – the proposed 1000 car park spaces cannot accommodate cars generated by 3200 proposed homes, despite best efforts to promote public transportation, ride sharing, and other transportation schemes. In addition, approximately 70% of eastbound traffic on the A40 does not go to central Oxford. Access to Headington and East Oxford would still be difficult by public transport. There are also no proposals for improved public transport over the Swinford Toll Bridge.

The A40 is already heavily congested with the attendant financial, amenity, environmental and time costs. Explicit solutions need to be in place well before any new homes are built or ready for occupation – this includes bus lanes, dual carriageway and light railway, plentiful safe crossings created for pedestrians and cyclists, as well as mobility vehicles and horses. Surrounding alternative A- and B-roads as acknowledged in the AAP are also already experiencing significant congestion issues.

The AAP does not at any point provide a comprehensive or detailed plan for mitigating any additional transport needs in the district, regardless of the proposed GV site or development. Until

the strategic transportation network problems have been resolved throughout the district, housing development on such a large scale should be restricted.

The AAP for the GV needs to consider impacts and improvements to the Parish as a whole and to special qualities of Eynsham and its surroundings - such as the ability to walk to good independent shops, quality schools and doctors, easy access to countryside and greenspace. The developments should enhance and complement, rather than disrupt, Eynsham's special qualities; the nuclear design of Eynsham with its surrounding accessible countryside for all should be a model for the GV.

The AAP has not included or responded to several points expressed in the Eynsham Neighbourhood Plan (ENP) in terms of Eynsham residents' views on housing, connectivity, transport, educational and medical facilities, biodiversity and energy reduction and creation. This is the best, most detailed and representative evidence available and should not be ignored. It was gathered over a two-year period and was used to develop the ENP. Evidence gathered by WODC and developer Grosvenor from Eynsham residents is minimal by comparison.

As such, Eynsham residents should have their elected representatives (Eynsham Parish Council and District Councillors) and other key stakeholders present where high level decisions are made. Until new residents are established in the GV, Eynsham residents should be represented in the management of the site.

There is confusion in the WODC and in the community about whether the GV should have its own Parish Council. This could mean an extra £1 million for the GV, leaving Eynsham bearing the strain of the new development with no extra resources. If the GV stays within Eynsham Parish, then new resources made available could be used to support this development; for example, Eynsham Primary School to accept new residents. No comment or consideration has been made for this.

While the GV is being built over several years, the new homes will put strain on Eynsham's educational and medical facilities. There is a risk that necessary investment in Eynsham schools could be diverted to the educational facilities planned for the GV while not providing for the increased population. In addition, any new facilities will take time to be up and running, if indeed they are not downgraded as a result of 'viability considerations' during development. In the meantime, the strain on existing Eynsham schools will be intense. Thereafter, a potential split school site as proposed will entail a dangerous road crossing for pupils, and further separating the community. The same is true of medical facilities.

Primary schools and medical centre in the GV must be built and ready before first occupation of the homes. Eynsham Primary School will have no capacity once additional development to the west of Eynsham is complete, and no provision or policy has been outlined as how this will be managed.

Regarding the proposed housing itself, the AAP for the GV needs to incorporate active involvement of local groups and community ownership and management with land value capture to benefit the whole parish of Eynsham and provide guaranteed genuinely affordable housing options for rent/purchase/shared ownership/self-build in an open and integrated community.

The enhanced land value accruing to the land owners is socially created and should be socially used. If the GV is built, it should be under the auspices of a community trust. The surplus land value would then be invested in better facilities for the GV and Eynsham, and would help resolve collateral transport, community and environmental problems.

The proposed 50% affordable houses should have a strong element of social rented and shared ownership to help those on low incomes. However, the 20% discount on market value will put homes out of reach for many people as the starting market prices will be too high in this area, as demonstrated by consistently increasing market values. The council and AAP should consider the financial implications of affordable housing and include provisions of how this will be managed.

Prices and rental must be genuinely affordable for people on low incomes, single people, and first-time buyers. The housing stock should include, for example, studio apartments, 1/2/3 bedroom houses and apartments, co-housing, sheltered accommodation, downsizing homes for those who live in big houses in Eynsham. Four/five bedroom homes as proposed are not required. Housing should be high density with small private gardens which leaves open countryside around the GV for new and existing residents to enjoy.

The AAP must enforce the highest standards of zero carbon construction and creative design and requires an innovative approach to energy use and production producing clean, renewable energy to benefit the whole of Eynsham Parish. The village must be a net exporter of community renewable energy. Sustainability provisions incorporated in the Planning Permission must be legally enforceable and should be completed where possible before house building begins. These have not been addressed explicitly.

Part of the development proposal includes a light industry business park. The AAP does not provide any evidence as to the need for such a business area, or the types of businesses that it expect to occupy these units. It is the responsibility of the council to demonstrate this need and outline a strategy for attracting businesses - if there is indeed a need.

Green space provision in the developed area must be generous and have a clearly defined policy for future management, preferably by the Parish Council, built in to the AAP. Making built up areas denser and built around a pleasant village green or square and allowing more green space around the edges of the new village would echo Eynsham as a nucleic settlement. Houses could have good sized rear gardens but small or no front ones as in most of Eynsham. This design would also allow more space between the 2 settlements and make the GV a truly separate village.

In conclusion, no other settlement in Oxfordshire has had such a disproportionately large proposed growth in relation to its existing population. The increased population would be inequitably out of scale, and the proposed period for development too short.

Eynsham as a community, in the Eynsham Neighbourhood Plan, has proposed 750 new homes for local and district needs, in itself an unprecedented expansion of the village which would need careful management. The 3,200 homes proposed to the north and west of the village, arbitrarily imposed by WODC, represent too great and too rapid an expansion that will overwhelm the village community and deprive it of its character, identity, and cohesion.

While this AAP focuses on the Oxfordshire Cotswolds Garden Village, I personally am aware of other proposed developments in the area, including the western expansion of Eynsham, and developments in Freeland, Church Hanborough, Barnard Gate, and South Leigh. While I acknowledge these are not at any formal proposal stage at this time, it would be foolhardy for the council and AAP not to acknowledge possible future expansion in these areas and include specific provisions for 'additional development' in the AAP, especially in regards to essential community infrastructure of

schools, shops, medical facilities, transport, protection of green spaces and historic structures, and environmental impacts.

I hope you take the above issues into consideration, and would request that the individual points raised here are clearly addressed in WODC's consultation response, in the spirit of transparency and open communication between the district council and its constituents.

Regards,

Signed

Date

Address