

Consultation on additional technical evidence

Comments on the Sustainability Appraisal (SA) Further Addendum Report

Angie Titchen 18 December 2017

My overall concern about the latest revisions of the West Oxfordshire Local Plan is that fundamentally no change has been proposed in relation to the Strategic Development Areas, despite the weaknesses that were highlighted to the Inspector, Malcolm Rivett, in the 2017 Hearings. I have therefore scrutinised the **Sustainability Appraisal (SA) Further Addendum Report** that undertook to re-appraise the SDAs and look at and compare alternative sites to examine why this might be the case. My conclusion is that the revisions made in the Local Plan are flawed and therefore unsound.

As I am a long-standing resident of Eynsham and a member of the former Eynsham Futures that steered the development of the Eynsham Neighbourhood Plan (ENP), my questions, arguments and comments are primarily focused on the substantive and methodological matters that the SA raises for me in relation to the Strategic Development Areas (SDAs) of the Oxfordshire Cotswolds Garden Village and West Eynsham. However, the methodological matters I raise are also potentially relevant to the other alternative sites considered, analysed and then compared with the SDAs. Both substantively and methodologically, I show how the SA is flawed and could therefore be considered unsound. Having studied the changes made to the Local Plan in the light of the SA conclusions, I also consider that the Local Plan continues to be flawed.

1. Methodological Matters

Enfusion, the independent consultancy that carried out the earlier SA for WODC, was again employed to carry out this new appraisal. As a researcher myself, I see a strong, potential risk of bias being introduced right from the start. Therefore, I looked for evidence of rigour and comprehensiveness in terms of baseline information and documents used and how objective, validated professional judgements were executed. I found a number of omissions that concern me that the conclusions reached by Enfusion (and accepted by WODC) in relation to the SDAs are in danger of being biased. This bias relates to the baseline information they chose to use or not use and in the absence of any explication of the values the Enfusion staff involved in making professional judgements hold. I give examples in relation to the SDAs in (2) below.

I was unable to find in the SA a list of the baseline information and documents used. For example, there are documents that I know WODC is aware of which provide convincing evidence of significant biodiversity and heritage assets in the OCGV site which appear to have been ignored in their appraisal. In addition, whilst the 16 SA Objectives and categories of significance are clearly set out in the SA, how the judgements on the nature of likely effects and categories of significance were actually made is not. This obscurity creates potential for bias to creep in.

So questions arising from my concerns are: Is the account of the methodology and methods used in the SA inadequate in terms of baseline information used and professional judgement criteria? If so, does this inadequacy reduce the credibility of the SA?

2. Substantive Matters

Reasonable alternatives to the two Strategic Development Areas, **Oxfordshire Cotswolds Garden Village (OCGV) and the West Eynsham Strategic Development Area** have been examined, compared and assessed in the Sustainability Assessment. However, recognised heritage and biodiversity assets in the OCGV have not been properly assessed or compared.

OCGV (North of Eynsham) SDA

Historical assets (SA Objective 14)

It is unclear whether the revised SA is referring to the heritage asset of, and archaeological interest in, a rare medieval plague village in the north west of the site

‘Policy EH7 (Historic Environment) expects all development proposals to conserve or enhance the special character and distinctiveness of the historic environment, conserve or enhance the District’s heritage assets and their significance and settings. There is the potential for a minor negative effect on heritage due to the presence of Listed Buildings within the site option, but some uncertainty remains until project levels studies and detailed master planning – particularly with regard to any archaeological interest.’

(Appendix 3, p. 12/30)

The potential heritage asset and archaeological interest of the medieval village were set out at the Inspector’s Hearing in July 2017 by historian Steve Parrinder. He described this site as ‘rare’ because there is strong evidence that every inhabitant died at the time of the Black Death (recorded in the cartulary of Eynsham Abbey). He described it as an undisturbed time capsule of medieval life on an important trade route. The Inspector was also personally given a LIDAR map of the site clearly showing the roads and house platforms of the settlement and strip fields within and around the village. The SA (4.5) suggests that ‘Minor negative effects were indicated in recognition of historic assets within the north of the site area. Some uncertainty of significance of effects remains until detailed master planning but effective mitigation is likely with potential residual neutral effects’. Again it is not clear if the historic asset of an undisturbed time capsule has been taken into account with this minor negative effects rating.

Questions:

- Was the LIDAR map of the medieval village site part of the baseline information examined by Enfusion? Were they cognisant of the historical

assets and archaeological interest pointed out by Steve Parrinder at the hearing and in his written statement to the Inspector?

- Did Enfusion receive this information from WODC?
- If so, why has this potential asset and archaeological interest been ignored by Enfusion? If this were the case, would this be evidence of bias on the part of Enfusion? How can we be sure there isn't any bias?
- Whose values are coming into play with the conclusions here?
- Is anyone leaning on anyone?
- What if the revised plan is adopted and then at the master planning stage, it is deemed necessary to provide sufficient landscape mitigation buffer for the medieval village and this substantially reduces the amount of land available to deliver the housing? **Will the OCGV site still be viable?**

Biodiversity assets (SA Objective 13)

In the SA (4.4), it is stated that 'neutral effects are predicted for all options [i.e., OCGV, North of Barnard Gate & Barnard Gate Garden Village] on SA objectives for ... biodiversity'. This conclusion is completely astonishing for Eynsham residents. During the development of the ENP, it was uncovered that City Farm on the OCGV site is a possibly unique place in West Oxfordshire with European significance.

City Farm is unusual (possibly almost unique) in that the whole farm area (excluding the horse grazing fields) is farmed in a wildlife-friendly way, avoiding almost all of the intensive methods that have impacted our wildlife in recent decades. The farm has been closely monitored by local experts with expertise primarily in botany, entomology and ornithology to document the range of wildlife now present, and a small advisory group has been set up to oversee the spending of financial grants obtained via the Landfill Tax Credits scheme. Although at still a relatively early stage, the results have been striking. The three main areas of successful progress have been with arable plants, wildflower-rich grassland and birds.

(Alan Larkman (2016) City Farm near Eynsham – an overview of conservation activities and achievements)¹

Moreover, an arable plant survey resulted in City Farm being identified by Plantlife as having European Importance for arable plants.

'The fields at City Farm have been regularly surveyed between 2014 and 2016 by experienced botanists including the Oxfordshire Flora Group and BSBI vice-county recorder providing specialist identification of difficult species, such as nettle-leaved goosefoot and blue pimpernel. City Farm has an IAPA score of 90 making it of European Importance for arable plants'

(Plantlife, Natural England)¹

¹ All documents concerned with City Farm conservation, achievements and European Importance can be supplied if required.

Although Plantlife is not a statutory designation, this very high IAPA score is an important indication that something very special is going on at City Farm.

Questions

- Given the SA objective 13, 'Conserve and enhance biodiversity ...', how is planning to build on City Farm going to achieve that objective?
- I know that WODC knew about the City Farm conservation of wildlife and increase in biodiversity and that they received the City Farm conservation, achievements and European Importance papers, so why have they accepted that there will be a neutral effect if City Farm is built on and the conservation work and organic farming of some years is destroyed?
- Did WODC give Enfusion these documents along with other progress reports on wildflower-rich grassland, birds and insects that were made available to them by the tenant farmer at City Farm?
- If not, why not? If they did, how did Enfusion arrive at their 'neutral' weighting?
- Is it OK to ignore the evidence gathered for the Plantlife survey report by experienced botanists and plant specialists, just because Plant life does not have a statutory designation?
- If landscape mitigation is found to be necessary at a master planning stage, given the dispersed arrangement of the fields with arable plants of European significance, will this substantially reduce the amount of land available to deliver the housing? **Will the OCGV site still be viable?**

If mitigation is required for the medieval village site in the north of the OCGV and the fields and wildlife corridors of City Farm for transmission of seeds and if one also takes into account: the City Farm listed buildings; the strategic minerals processing site; split ownership of the land with two landowners refusing to sell and; high risk Flood Zone in the north and south east of the site, **will the OCGV site still be viable?**

Improve the efficiency of land use (SA Objective 7, with an impact on Objectives 10, 11 & 14)

SA Objective 7 seems to have been interpreted as having no relevance for any of the three site options because they are all greenfield sites. Is this sensible? Is it right? In relation to the OCGV site, it seems to me that using land to grow nutritious, organic food in ways that increase biodiversity and wildlife is a very efficient use of land. In addition, maintaining trees in very wide hedgerows (that are not cut back) as they are currently managed provides not only a carbon sink for greenhouse gases created on the A40, but also wildlife corridors.

Question: Is it inefficient to use such land for building houses?

Whilst the SA claims that the North of Barnard Gate site has grade 3a soil, as does the West Eynsham site (ALC survey map ALCR05298), my local knowledge suggests that the farms on these sites have not set out intentionally to increase biodiversity.

Finally, one of the main reasons in the SA for choosing to progress the OCGV rather than the other 2 sites, is a major source of contention for Eynsham residents and Parish Council. Enfusion state (4.14):

The emerging Eynsham Neighbourhood Plan ... supports the Oxfordshire Cotswolds Garden Village through its draft Policies ENV8 and ENP16 that seek the new community to be separate from the existing community and also set out a number of site specific requirements and recommendations.'

Categorically, the ENP does not allocate the OCGV as a development site nor does it support the WODC's allocation of the OCGV site. It only complies with the law that Neighbourhood Plans must fall within the Local Plan. The ENP16 policy set out specifically for the OCGV site what would be required generally of any development site the WODC chose. It was a damage limitation policy in effect to ensure that the OCGV would be built using the same principles for creating a thriving and inclusive community but in a completely separate village.

WODC knew that the ENP was not allocating sites, but they chose not to inform Enfusion that they had misused the ENP to support the OCGV site option over the alternative sites.

It is also concluded that the OCGV has 'support from the Government's Locally Led Garden Village initiative'. The truth is that this support (amounting to approximately £200,000) was won by putting forward a proposal that relied on a survey of the south of the site only. Apart from a Flood Zone 2 in the southeast corner of the site, all the above concerns arise from the northern part, which was not included in WODC's proposal. This case has already been made to the Inspector, but it does not appear to feature in 4.15.

Questions: What is going on here? Is this evidence of bias through omission, i.e., failing to inform Enfusion of their error or do they genuinely believe that the ENP was making site allocations in their Plan? Is there an ethical issue at stake here? Has WODC glossed over inaccuracy to further their preferred option and dress up the SA conclusions as based on objective evidence? It is all very worrying.

West Eynsham SDA

SA 14 - 'There is concern about major development to the west of the village by the local community.' This statement is related to the case for progressing the OCGV (4.14).

What the local community is concerned about in relation to the West Eynsham SDA is the WODC proposal to build on the south of the Chil Brook as well as north of it. The ENP has the community's support for **appropriate expansion** (i.e., 750 new homes on the west). They want this expansion of the village to be kept north of the Chil Brook. What has concerned Eynsham residents is WODC's desire to develop south of the Chil Brook as well. The community want to keep this area as green fields

as it is a well-being asset (i.e., SA Objective 2), given that Eynsham has no village green or park. This concern has already been presented to the Inspector's Hearings in 2017, so I do not go further into it here. It is emerging now that Eynsham residents prefer the 550/450-split site option with Hanborough taking the 450. This option has the added advantage of proximity for these 450 homes to a mainline railway station.

Questions: By drawing from the ENP an unqualified statement about residents' concern about major development on the West of Eynsham, has Enfusion conflated residents' actual concern to (1) make a case for taking OCGV forward and (2) to foist a road on them that the community does not want. Are Enfusion/WODC trying to make it appear to the Eynsham community that (1) a major development on the West won't happen if the OCGV goes ahead and that (2) the West of Eynsham SDA will be only be 1,000 homes (including building south of the Chil Brook) and that it will be really good because it will benefit the Eynsham community. **Have Enfusion and WODC been disingenuous?**

In (5.13), Enfusion argue that a development of 1,000 homes will be sufficient to build a relief road to ease congestion in the village. Eynsham residents considered this possibility themselves during the development of the ENP, but agreed that they did not want a relief or spine road (the reasons are set out in the ENP). The community knows that the WODC has wanted a western bypass around Eynsham for decades for the purpose of relieving congestion in the village but also for future development to West Eynsham (potentially causing even more congestion on the Eynsham bypass and Toll Bridge and access to the A40).

Question: Will WODC ever listen to the people of Eynsham Parish?

We do not want this road. Eynsham is already isolated from its rural setting by fast, heavily used and dangerous roads on three sides; a fourth bypass/relief/spine road on the west side would complete our isolation. The split option with Hanborough should be reconsidered.

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