

Hearing Statement:

Matter 10 – Environmental and Heritage Assets

Answer to 10.1

Regarding Policy OS3 – Prudent Use of Natural Resources – the Local Plan may say the right things, but the reality is quite different. For example:

- **“delivering development that seeks to minimise the need to travel”**

The addition of 2,200 new homes in the Garden Village and 550 homes in west Eynsham, all specifically to meet Oxford City’s unmet housing needs, will turn Eynsham and the Garden Village into dormitory suburbs and encourage, not minimise, the need to travel. If the envisaged future residents do not work in Oxford, but locally, how will the new homes meet Oxford’s unmet housing need, unless everyone relocates to live and work in Eynsham? Likewise, if they live in Oxford, but work in Eynsham (eg, in the Science Park), how is that going to help?

- **“minimising their impact on the soil resource”**

The LUC report says that development on the Garden Village site “would have a significant negative effect on efficient land use and preserving soil quality”. Of the assessed southern half of the site, 77% is Grade 3 agricultural land (not clear if this is 3a or 3b), and 18% is Grade 1. Grades 1, 2 and 3a “are considered to be a national resource and should not be lost”. As you go further north, the land tends to become lower grade, but the ‘bungalow field’ directly to the east of City Farm barns, for example, is likely to be Grade 3.

- **“All new residential development will be expected to achieve the optional building regulations requirement for water efficiency of 110 litres/person/day.”**

This is all very well, but in a district described by the Local Plan as subject to “demonstrable water stress”, even efficiently run new homes and businesses are going to add to the water stress. A huge influx of new homes will greatly exacerbate this problem.

- **“minimising risk of flooding”**

Because the EoI, the Local Plan, and the Enfusion and LUC reports all ignore the unassessed northern half of the Garden Village site (and overlook problems in the east of the site), the flood risk there is likewise ignored. As *‘Cotswold Garden Village: A Case of Mistaken Identity’*¹ makes clear, “The City Farm brook, classified in part as Flood Zone 3, regularly floods the fields immediately to the north of City Farm, where houses and a road are proposed for the Garden Village. Local experience would suggest that the Environment Agency’s flood risk map actually underestimates this risk. Local knowledge also takes precautions against the flooding of the lower part of the field to the east of City Farm (immediately to the west of Lower Road), by leaving it unploughed for crops because of its waterlogged soil. Furthermore, the maps in the *‘The West Oxfordshire Level 1 Strategic Flood Risk Assessment 2016’* show (i) the high ‘likelihood of surface water flooding’ in parts of the north and east of the Garden Village site; (ii) a wide strip in the east of the site subject

¹ Sent separately but also available from barnrocks@yahoo.co.uk.

to 50%–75% susceptibility to groundwater flooding; and (iii) the large flood warning area at Eynsham Mill and below, immediately to the east of Lower Road.”

Answer to 10.2

EH1 – Landscape character

It is hard to see how the Garden Village and the massive development to the west of Eynsham will enable **“The quality, character and distinctiveness of [Eynsham parish’s] natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity, [to] be conserved and enhanced.”** In particular, a western bypass will carve up the land there into disconnected pieces; and the idea that the existing and increasingly rich biodiversity in and around City Farm will be enhanced by the Garden Village is ludicrous. It should also be remembered that Eynsham parish falls entirely within the Wychwood Project Area, where, according to EH1, **“Special attention and protection will be given to the landscape and biodiversity”**. Let’s hope these are not also empty words.

EH2 – Biodiversity

The Local Plan is not aware of the Site of European Importance for Arable Plants, and associated wildlife. The Appendix to this hearing statement gives more botanical information. (It should be noted also that the Site abounds in amphibians, including the Great Crested Newt, sighted this spring in two separate ponds, so far.)

EH3 – Public Realm and Green Infrastructure

Just to note that Millennium Wood, owned by The Woodland Trust, is in danger of being entirely surrounded by the Garden Village, and therefore cut off from wildlife connectivity. (See map at paragraph 4.12 of the EoI.)

EH7 – Historic Environment

Of particular significance in relation to Eynsham parish is this sentence from EH7: **“Considerable weight and importance will be given to conserving the significance of listed buildings, both with regard to their fabric and their settings, and to conserving or enhancing the character or appearance of the District’s Conservation Areas.”**

It should be noted that the cluster of Grade II listed buildings at City Farm does not feature in the Local Plan, because City Farm is not in the assessed part of the Garden Village site.

The surviving footpaths through the area are of great historical significance. The one running north-east from Cuckoo Lane, north of Millenium Wood, and on to Eynsham Mill is part of an Anglo-Saxon boundary (the southern boundary of Tilgarsley); it is over 1,000 years old. Where it crosses the north-south lane from the A40 to Freeland is Tar’s Grave, probably the grave of Tilgar, who gave his name to a clearing in the forest, giving us Tilgarsley. Every effort should be made not to lose these ancient relics in our countryside.

Answer to 10.3

EH5 – Flood Risk

Once again, it is worth pointing out that the EoI is based on a misleading assessment of the flood risk for the Garden Village site. Only half the site has been assessed, and the flood risk exists largely, though by no means wholly, in the northern unassessed half. (See above under OS3, “minimising risk of flooding”.)

Answer to 10.4

EH6 – Environmental Protection

It would be interesting to know how air quality in Eynsham parish will be “improved” by the proposed new and widened roads, and large numbers of new homes and businesses, and the inevitable increase in traffic that all this will bring.

Yes, a dark skies policy is obviously necessary, though not enough, to make the plan sound.

Submitted by EPIC (Eynsham Planning Improvement Campaign) and Nigel Pearce

Appendix

From City Farm Arable Plant Survey (Plantlife and Natural England)

Arable plants are the fastest declining group of plants in the UK. They have declined by 96% in the last 200 years, 7 arable plants are extinct and 54 are considered threatened. Arable plants provide the foundation for much other farm wildlife providing pollen and nectar for insects, which in turn are food, and seeds for birds and mammals. By identifying locations with rare and threatened arable plants, management can be targeted to support this vital wildlife resource. Arable plants are tied to cultivation practices and would not survive without the regular ploughing of land. Management for arable plants includes annually cultivated uncropped margins, low-input widely drilled cereal headlands and low-input cereal crops. These are available through the Campaign for the Farmed Environment (CFE), as part of the old agri-environment scheme Environmental Stewardship and the new scheme Countryside Stewardship.

City Farm is a conventionally managed farm located near Eynsham in Oxfordshire. The soil coverage across the farm is neutral clay with acid deposits of sandier material. The Landfill Field (field 11) has been covered in topsoil imported onto the site as part of the restoration of this field. It is notably different from the other fields and contains species that are garden varieties, such as pansies and violets. These plants have not been recorded in the IAPA score. 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 [now 92] making it of European Importance for arable plants.**

Plant	Species	Status	IAPA Score	Field number
Annual knawel*	<i>Scleranthus annuus</i>	Endangered	8	9
Nettle-leaved goosefoot	<i>Chenopodium murale</i>	Vulnerable	7	11
Corn marigold	<i>Glebionis segetum</i>	Vulnerable	7	1, 9, 11, 14, 15, 19
Corn spurrey	<i>Spergula arvensis</i>	Vulnerable	7	1, 4, 9
Dwarf spurge	<i>Euphorbia exigua</i>	Near Threatened	6	9, 11, 14, 15, 19, 21
Field woundwort	<i>Stachys arvensis</i>	Near Threatened	6	1, 9
Blue pimpernel	<i>Anagallis arvensis ssp. foemina</i>	Nationally Scarce	5	11
Maple-leaved goosefoot	<i>Chenopodium hybridum</i>	Least Concern	3	11
Broad-leaved spurge	<i>Euphorbia platyphyllos</i>	Least Concern	3	11
Dense-flowered fumitory	<i>Fumaria densiflora</i>	Least Concern	3	9
Round-leaved fluellen	<i>Kickxia spuria</i>	Least Concern	3	9, 19, 21
Field pepperwort	<i>Lepidium campestre</i>	Least Concern	3	11
Knotted hedge-parsley	<i>Torilis nodosa</i>	Least Concern	3	11
Sharp-leaved	<i>Kickxia elatine</i>	Least	2	9, 19, 21

IAPA Scoring System¹

The score is based on the presence of threatened arable plants that have been given a rating of between 1 for locally rare species of least concern to 9 for critically endangered or extinct species.

Most threatened

9 – Critically Endangered

8 – Endangered

7 – Vulnerable

6 – Near Threatened

5 – Nationally Scarce

4 – Nationally Scarce

3 – Least Concern

2 – Least Concern

1 – Least Concern

0 – No Concern and not rated

fluellen		Concern		
Fig-leaved goosefoot	<i>Chenopodium ficifolium</i>	Least Concern	2	11
Many-seeded goosefoot	<i>Chenopodium polyspermum</i>	Least Concern	2	9, 11
Treacle-mustard	<i>Erysimum cheiranthoides</i>	Least Concern	2	11
Small-flowered crane's-bill	<i>Geranium pusillum</i>	Least Concern	2	11
Dwarf mallow	<i>Malva neglecta</i>	Least Concern	2	11
Babington's poppy	<i>Papaver lecoqii</i>	Least Concern	2	11
White mustard	<i>Sinapis alba</i>	Least Concern	2	9, 11
Grey field-speedwell	<i>Veronica polita</i>	Least Concern	2	11
Smooth tare	<i>Vicia tetrasperma</i>	Least Concern	2	1, 9, 11, 14, 15, 21
Bugloss	<i>Anchusa arvensis</i>	Least Concern	1	11
Small toadflax	<i>Chaenorhinum minus</i>	Least Concern	1	9, 11, 15
Henbit dead-nettle	<i>Lamium amplexicaule</i>	Least Concern	1	11
Corn mint	<i>Mentha arvensis</i>	Least Concern	1	19
Wild radish	<i>Raphanus raphanistrum</i>	Least Concern	1	9, 11, 15
Field madder	<i>Sherardia arvensis</i>	Least Concern	1	9, 14, 15, 21

¹ Byfield, A.J. & Wilson, P. J. (2005). *Important Arable Plant Areas: identifying priority sites for arable plant conservation in the United Kingdom*. Plantlife International, Salisbury, UK. http://www.plantlife.org.uk/publications/important_arable_plant_areas/.

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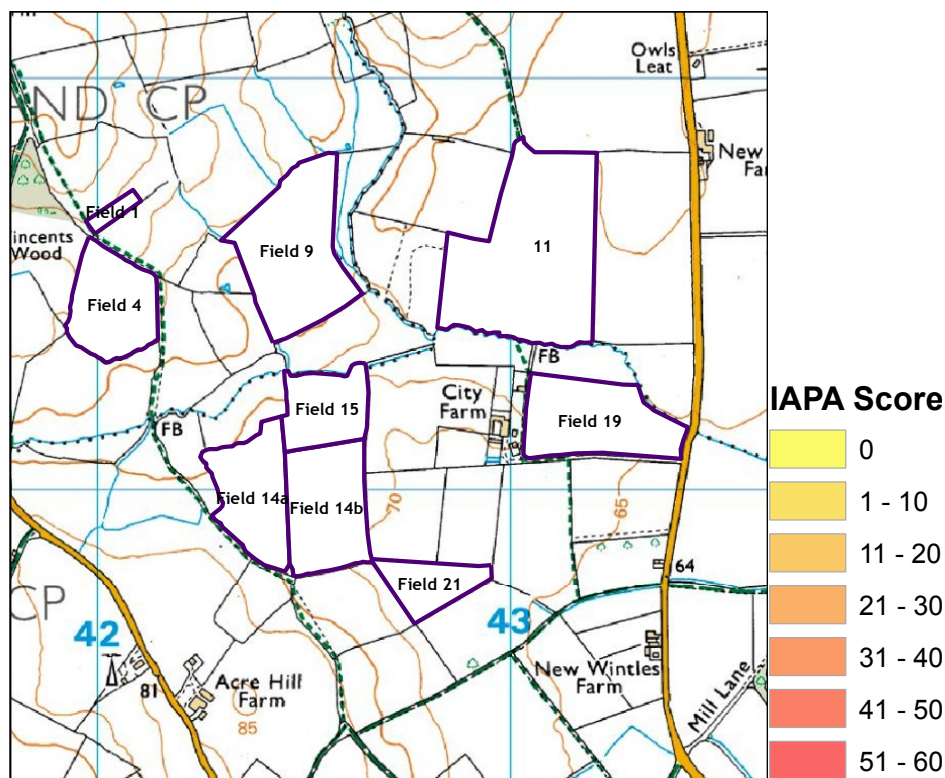


Figure 1: IAPA score per field at City Farm

Due to the variability of arable plant germination depending on a variety of factors such as weather, timing and depth of cultivation, field rotation and crop there is the possibility that some arable plants may not have germinated. There is also the possibility that plants growing within the crop or those that had not started flowering by the time of survey may have been missed by the surveyors. For these reasons it is recommended that a series of surveys are undertaken over a period of a few years to assess the arable plants present across the fields under the arable rotation.