



EYNESHAM PARISH COUNCIL

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Joan Desmond
Planning Services
West Oxfordshire District Council

Sent by email – Joan.Desmond@publicagroup.uk

20 January 2023

Dear Joan

Application No.	22/03484/OUT
Proposal	Outline planning application (with all matters reserved) for residential development of up to 180 dwellings together with open space, landscaping, parking and all associated infrastructure and engineering works.
Location	Land West of Derrymerrye Farm, Old Witney Road, Eynsham
EPC Response	Object

Eynsham Parish Council object to the application as it is contrary to planning policies including those for sustainable development. If the Local Planning Authority approve the application, the Council formally request to be consulted on all Reserved Matters applications. This response should be read in addition to the Council's previous submission.

**1. Eynsham Neighbourhood Plan - ENP3 (b) Infrastructure & Utilities
West Oxfordshire Local Plan – OS2 Locating development in the right places
National Planning Policy Framework – 8 c) Achieving sustainable development**

- 1.1. It is noted in the Utilities and Wastewater Assessment that there is sufficient capacity in the sewerage network for connection up to 100 dwellings and only 50 dwellings can be connected to the potable water mains network.
- 1.2. Referring to the applicant's previous proposal (22/03379/OUT) Thames Water's initial response¹ (dated 17 September 2020) advised that whether the application was for 200 or 1000 homes, there was insufficient capacity in the foul water network, however they would work up a solution. In Thames Water's second response² (dated 22 July 2022), capacity in the network is available for 50 homes, but beyond that upgrades to the foul water network are required.

¹ https://publicaccess.westoxon.gov.uk/online-applications/files/1D9C9087BBE0FF24F95914DBF227B179/pdf/20_03379_OUT-UTILITIES-908323.pdf

² https://publicaccess.westoxon.gov.uk/online-applications/files/6076FEA8E8C5EF4E01CD6ECC38125C88/pdf/20_03379_OUT-THAMES_WATER-1118276.pdf

- 1.3. The foul water network is already at capacity due to Thames Water's need to discharge untreated sewage in local rivers as evidenced by Windrush Against Sewage Pollution reports³ and Thames Water's new mapping system at <https://www.thameswater.co.uk/edm-map>.
- 1.4. Furthermore, when reviewing Thames Water's response for the Salt Cross Garden Village planning application⁴ (20/01734/OUT), the position is equally as challenging as there is no capacity for foul/waste or potable water supply within the existing networks. To summarise, for the development of West Eynsham Strategic Development Area and Salt Cross Garden Village (approximately 3200 homes), there is essentially no capacity in the water networks and no solutions for consideration.
- 1.5. We note that Thames Water has commented only to the consultation (not objected) and recommend conditions to address the network capacity issues. However, when referring to the Local Plan on this issue, para 4.3.1 raises the problem of 'water stress'⁵ and it appears the infrastructure capacity problem is more extensive than say, installing new water mains or upgrading Sewage Treatment Works. As part of the Local Plan examination evidence, AECOM submitted West Oxfordshire Water Cycle Study: Phase 1 scoping study (2016:2)⁶ in which it reports '...Waste Water Treatment Works (WwTW) serving areas of proposed growth in the Local Plan have adequate capacity to accommodate flows from new development with the exception of Cassington WwTW which serves Eynsham; Cassington WwTW would require upgrades to accommodate both local planned growth and allocation of unmet need of the City of Oxford. No details have been provided as to how this will be achieved.
- 1.6. Within AECOM's report, Thames Water's Water Resources Management Plan (2014) (WRMP) refers to the supply of water in which it forecasts '...a water supply deficit by 2024/25 in SWOX (Swindon Oxfordshire area) under dry year annual average conditions driven by a combination of population increase and climate change. Increased housing projections resulting from the Oxfordshire Strategic Housing Market Assessment (SHMA) after publication of the WRMP could potentially bring forward this deficit. Whilst TWUL has plans in place to secure supply, there is significant pressure on water resources in this area, which could benefit from initiatives to encourage reduced water consumption.'

³ https://www.windrushwasp.org/files/ugd/cda311_c6239944bded4dfc86348d7a0b72f044.pdf

⁴ https://publicaccess.westoxon.gov.uk/online-applications/files/7F0400EA7F54643DC620914C77A87CF7/pdf/20_01734_OUT-THAMES_WATER-1065112.pdf

⁵ 4.3.1 West Oxfordshire falls within an area of demonstrable 'water stress' and planned growth and other pressures are forecast to lead to a supply demand deficit in the next ten years. The West Oxfordshire Water Cycle Study: Phase 1 Scoping (2016), in assessing the impact of the Local Plan upon the water environment and water infrastructure provision, concludes there is strong justification for West Oxfordshire to have a water efficiency policy in line with the Building Regulations optional requirement of 110 l/h/d. This will support Thames Water's resource management planning and help to achieve more sustainable water usage.

⁶ <https://www.westoxon.gov.uk/media/rqwljqf4/env11-west-oxfordshire-water-cycle-study-phase-1-scoping-study-november-2016.pdf>

- 1.7. Thames Water has published an updated Water Resources Management Plan (2019) which covers the Swindon Oxfordshire area. It states ‘SWOX has a supply/demand deficit in dry year critical period (DYCP) starting from 2022/23 and growing throughout the planning period to 31 Ml/d by 2099/00.’
- 1.8. Amongst a series of proposals to address water shortage and improve resilience, a new reservoir at south-west Oxfordshire is planned (the ‘South East Strategic reservoir scheme’) which is anticipated to be in use for 2037/38 (2019:58). However, Oxfordshire County Council find the scheme flawed⁷ and the water stress our region is now experiencing, is unlikely to be resolved as planned.
- 1.9. It is therefore Eynsham Parish Council’s view that until the potable water supply and foul/waste challenges are addressed with long term proposals, the application is not in accordance with the sustainable objectives of the NPPF or local policies. ENP3(b) requires that ‘developers shall demonstrate before development consent is given that each utility network has or will have adequate capacity before occupation...’.

Other comments - Eynsham Neighbourhood Plan

2. ENP3 Community Facilities

- 2.1. Infrastructure should be built first. This will avoid children being transported by car to the existing primary school which would otherwise be (a minimum of) a 26+ minute walk along the A40 footpath.

3. ENP5 Sustainability: Climate Change

- 3.1. The Council note the proposed Sustainability Strategy (page 3) and support the proposed fabric first approach in line with Future Homes Standard 2025. We commend the site being electric only – no gas. The new Future Homes Standard should ensure that all new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations⁸. We firmly encourage the applicants to do more than the minimum required in current Building Standards and commit to roof mounted PV arrays for renewable energy in addition to all other viable options.

⁷<https://news.oxfordshire.gov.uk/download/1161059/oxfordshirecountycouncilwrseconsultationresponsemar2022final.pdf>

⁸<https://www.architecture.com/knowledge-and-resources/knowledge-landing-page/the-future-homes-standard-explained>

4. ENP7 Sustainable Transport

4.1. The Design & Access Statement Addendum Movement Strategy (page 24) refers to a vast number of Private Drives (shared surface). Eynsham Parish Council object to this proposal – all roads should be of a standard maintainable by Oxfordshire County Council (OCC) as the local highway authority, in accordance with Oxfordshire Street Design Guide (2021:17). Further, given the quantity and length of these ‘drives’, they are more identifiable as secondary roads and should be designed, constructed and adopted by OCC as such. Neither residents or management companies should be required to oversee maintenance of these areas and the Council object to this money-saving proposal (Manual for Streets, 2007:134).

5. ENP14A Sustainable Growth

5.1. There is much consternation regarding vehicle access on the Old Witney Road. It is proposed that this current dead-end road, will be used by the Nursery Site and this site to access the Spine Road/village. Policy ENP14A H. provides that ‘...accessible and safe connectivity between new development and Eynsham ...is designed to minimise the impact on through traffic and existing road users.’ Further, at paragraph I, proposals shall be required to ‘...avoid congestion in the village by limiting vehicular access through the village to new developments.’ Vehicular access through Old Witney Road should be kept to a minimum and the road limited to pedestrians/cyclists access only at the earliest possible time.

5.2. The Council support the Central Residential Boulevard and all other roads in the SDA being designed and implemented at 20mph speed limit specifications. All Eynsham village roads are 20mph limits with only the outer ring roads set at 30/40mph limits.

It is clear from Oxfordshire County Council that substantial archaeological work is required to support the application. Aerial photography appears to show substantial cropmarks.

The application in its current form, does not achieve the economic, social or environmental objectives that constitutes sustainable development as set out in the National Planning Policy Framework 2019 and does not comply with WODC’s Local Plan 2031.

There are sustainability issues to be overcome before this application can be considered compliant with planning policies.

Yours sincerely



Mrs Katherine Doughty
Clerk to the Council