



**Eynsham Neighbourhood Development Plan Regulation 16 Consultation Response form:**

Eynsham Parish Council has prepared a Neighbourhood Development Plan and would like your comments. In order for your representation to be taken into account at the Neighbourhood Plan examination and to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. The consultation opens on **Tuesday 1<sup>st</sup> August 2017**, and closes at 5pm on **Tuesday 19<sup>th</sup> September 2017**.

All comments will be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by West Oxfordshire District Council in line with the Data Protection Act 1998.

Please fill in your details in the boxes below:

Full Name:

Organisation represented (if applicable): Barton Willmore LLP (On behalf of Goldfield Estates Ltd)

Address (including postcode):

Telephone number:

Email address:

Please state which part of the Neighbourhood Development Plan (for example which section, objective or policy) your representation refers to.

Representation refers to following Neighbourhood Plan Policies: -

ENP 1 – Housing, ENP 2 – Design, ENP 6 – Education, ENP 7 – Sustainable Transport, ENP 8 Connected Place, ENP 9 – Parking, ENP 12 – Local Green Space, ENP 13 – Trees, ENP 14 – Sustainable Growth, ENP 16 – North of A40, and ENP 17 – Development of western extension to the village.

Please use the space below to make comments on this part of the Plan.

Please see separate sheet.

**Please use a separate form for each representation.**

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Development Plan Proposal:

Yes

No

This form can be emailed to [astrid.harvey@westoxon.gov.uk](mailto:astrid.harvey@westoxon.gov.uk) or posted **FAO Astrid Harvey, Community Development, West Oxfordshire District Council, Elmfield, New Yatt Road, Witney, OX281PB**, by 5pm on Tuesday 19<sup>th</sup> September 2017.

15<sup>th</sup> September 2017**EYNHAM NEIGHBOURHOOD DEVELOPMENT PLAN – REGULATION 16 (PART 5)  
NEIGHBOURHOOD PLANNING (GENERAL) (AMENDMENT) REGULATIONS 2012  
CONSULTATION**

These representations have been prepared by Barton Willmore LLP on behalf of Goldfield Estates Ltd. in response to the Regulation 16 consultation on the Eynsham Neighbourhood Plan (version 2.2). The representations expand upon the previous consultation responses submitted earlier this year in January 2017.

**Background**

Goldfield Estates, a joint venture between Jansons Property and the William Pears Trust, controls an 8ha area (approx.) of land known as Derrymerrye Farm and The Long Barn on Old Witney Road in Eynsham. The site lies predominantly within the north-central part of the proposed West Eynsham Strategic Development Area (SDA) in the emerging West Oxfordshire Local Plan. A site location plan of the land is attached at Appendix 1.

West Oxfordshire District Council is at an advanced stage in the preparation of the Local Plan. Goldfield Estates, therefore, emphasise the weight that the draft Local Plan policies should now be afforded in the detailed consideration of the Neighbourhood Plan to ensure consistency.

**ENP1 – Housing**

Goldfield Estates is broadly supportive of the aim of Policy ENP1 subject to the following concerns where we consider the requirements lack clarity or are inconsistent with requirements for the planned development at West Eynsham as set out in Policy EW1b of the West Oxfordshire Local Plan and Policy ENP17 of the Eynsham Neighbourhood Plan.

Firstly, we note that criterion C is expressed as providing “a mix of 2 bed units” to meet differing housing needs, to which we have no objection, but seek confirmation that this does not require any increased proportion of 2 bed units, above that reflected in the Oxfordshire Strategic Housing Market Assessment for West Oxfordshire District.

Secondly, Criterion D states that residential development should ideally be located within 1000 metres of the village centre (this is identified on Map 2 in the plan). Whilst we note that the wording provides a degree of flexibility, this approach is clearly inconsistent with the approach set out in Policy ENP17 and as shown indicatively within Map 4 of the plan which relates to the West Eynsham development.

**ENP2 – Design**

Goldfield Estates supports Policy ENP2 and the need for new development to be well related to, and in keeping with, its immediate setting, character and to the wider village and landscape context in accordance with the requirements set out in the Development Plan. Moreover, as set out in Part G of the policy, the need for a comprehensive masterplan, to be agreed with the LPA, for allocated sites of over 100 dwellings is supported.

A comprehensive masterplan, which is informed through consultation and approved by the West Oxfordshire District Council, will ensure that strategic development at Eynsham including the West Eynsham SDA is comprehensively masterplanned, integrated into the village and will secure the delivery of the necessary supporting infrastructure.

#### **ENP6 – Education**

The provision for education facilities through new development is supported by Goldfield Estates Ltd. The preparation of a comprehensive Masterplan for West Eynsham SDA will include provision for a new primary school in consultation with key stakeholders including Oxford County Council and the Eynsham Partnership Academy. Work to inform the masterplan and phasing of the delivery of a new educational facility will be based upon an assessment of existing educational capacity and anticipated demand for school places and facilities informed by the type and number of dwellings proposed to determine the level and location of new or additional provision.

Goldfield Estates notes the requirement in paragraph 6.8 which states that 'development giving rise to a new Primary School should all be within 800m and within 2000m of the local secondary school'. The need to ensure any new educational facility is centrally located is welcomed, however, we would request that the distance requirements are guidelines and that flexibility is introduced to assess distance parameters on a site-specific basis.

#### **ENP7 – Sustainable Transport**

Goldfield Estates supports Policy ENP 7 aimed at ensuring all new development has safe access to local transport networks by private car and public transport. It is agreed that all new development shall only be accessed by motor vehicle from existing main roads (A40, B044/4449) and the flexibility to consider allowing limited traffic to filter into the village including through routes for public transport is welcomed. Goldfield Estates support the requirement for the West Eynsham SDA to provide a link road from the A40 to the B4449. It is considered that the link road would be a residential street, incorporated within the SDA with development both sides and supporting pedestrian and cycle paths as appropriate.

#### **ENP8 – Connected Place – integration of new developments within the village**

Goldfield Estates recognises and supports the importance of integrating new developments within the village. The comprehensive Masterplan for the West Eynsham SDA will set out the access and movement strategy for the site to ensure that designated paths provide direct, secure and 24/7 access to the village centre, constructed to standards compatible with their purpose.

#### **ENP9 – Parking**

The need to ensure that new development shall include appropriate parking for both residents and visitor is supported and reinforces the objectives set out in Policy T4 of the West Oxfordshire Local Plan. Part D of policy ENP 9 sets out that provision shall be made for charging of electric vehicles at each new home. Concern is raised regarding the prescriptive nature of this part of the draft policy which fails to recognise the increased cost of provision of this scale of infrastructure but, moreover, the practicalities for provision of charging points for different types and tenure of dwelling. We would suggest that the policy wording is amended to state:-

*'In order to promote a greater role for Ultra Low Emission Vehicles, development proposals which support and encourage the use of electric vehicles will be supported'*

#### **ENP12 – Local Green Space (LGS)**

Policy ENP12 identifies 16 areas of land proposed to be designated by the Neighbourhood Plan as areas of Local Green Space (LGS). The draft policy confirms that development within any LGS shall

only be permitted as part of a landscape design to enhance community enjoyment of the green space and contribute to improvement of the character, bio-diversity, appearance and overall quality or amenity value of the space.

Whilst Goldfield Estates is supportive of the principle of safeguarding areas of Local Green Space, we would raise concern regarding the allocation of LGS9 (Old Railway Line) and LGS10 (Fruitlands Wood). Both allocations fall within the West Eynsham SDA and it is considered premature to safeguard these areas from development in advance of the preparation of a comprehensive masterplan for the site. Indeed, there is an application on LGS10 for the redevelopment of the site for 6 dwellings (LPA Ref: 16/03873). The masterplan is proposed to be developed through locally led consultation and will be informed through technical and environmental studies which will include a green infrastructure strategy. In advance of this work it is considered that the potential allocation of LGS9 and LGS10 would be unduly restrictive and unnecessary due to the masterplan process.

### **ENP13 – Trees**

Policy ENP 13 states that 'existing trees within the Parish shall be protected and maintained in good health'. It goes on to state that trees lost through development shall be replaced on site, or nearby, with new development allowing for the provision for planting additional trees.

Goldfield Estates recognises the importance of safeguarding existing trees, but in the absence of detailed surveys, considers the protection of all existing trees within the Parish is unduly prescriptive. Furthermore, concern is raised regarding the supporting text at paragraph 13.4 and recommendation 13 which states that Tree Preservation Orders should be placed on trees within sites that are allocated for development. It is not considered to be the remit of the Neighbourhood Plan to demand the statutory protection of trees within the Parish. Moreover, any application for development at West Eynsham SDA would be subject to a detailed arboricultural survey and impact assessment which would seek to safeguard quality trees and inform the preparation of a comprehensive masterplan.

### **ENP14 – Sustainable Growth**

The sustainable growth of the existing village and the need to protect the character and existing community is strongly supported. Goldfield Estates confirm that the preparation of a comprehensive masterplan for West Eynsham SDA shall be underpinned by a series of technical and environmental studies to ensure that the relationship to the wider countryside, Chil Brook flood plain, designated heritage assets and infrastructure is fully considered.

Criterion D of Policy ENP14 states that larger allocated sites should have approved by the LPA a masterplan and associated planning brief SPD before consideration is made of an individual proposal. Goldfield Estates agree that the development of the West Eynsham SDA should be comprehensive and led by an agreed masterplan to ensure that a comprehensive infrastructure strategy is fully considered to minimise A40 congestion and have regard to the wider context for development. The need for any individual planning application to accord with the overarching principles of the agreed masterplan is also welcomed.

WODC Local Plan Policy EW1b supports the requirement for the West Eynsham SDA to be led by an agreed masterplan. It does not, however, refer to the need for an associated planning brief SPD. Goldfield Estates raises concern regarding the reference to the preparation and approval of a planning brief SPD. This is not considered to be required in the WODC Local Plan and would have an additional delay in the delivery of the site. To ensure conformity with the Local Plan Policy, we request that the requirement for the preparation of a Planning Brief SPD set out in Part D of policy ENP 14 is removed.

Recommendation 14, Part A, suggests the need to ensure effective phasing and co-ordination between major sites in Eynsham, notably the West Oxfordshire Garden Village (WOGV) and West Eynsham SDA. Paragraph 14.6 goes on to state that larger sites allocated for development under the WODC Local

Plan shall be regarded as one site for the purpose of the Neighbourhood Plan and subject to a unified masterplan. This is also referenced in recommendation Part F.

Goldfield Estates wish to highlight a significant concern with this proposed approach. It is considered that the need for an overarching plan for the timely and integrated development of the Garden Village, West Eynsham SDA and A40 is unnecessary and could unduly delay the delivery of the West Eynsham SDA due to the timescales, number of stakeholders and complexity of issues the linking of these two very different sites would create.

Goldfield Estates remain committed to the early delivery of the West Eynsham SDA. The site received very little direct criticism during the recent Local Plan Examination, contrary to the lengthy debate on the Garden Village. The two sites are also distinct from one another. West Eynsham SDA should be regarded as an extension to Eynsham Village, whilst the Garden Village is identified and recognised as a new settlement in the WODC Local Plan. Moreover, the scale of development and the number of landowners/developer partners at West Eynsham in comparison to the Garden Village is significantly lower further facilitating the ability for the site to come forward in advance of the Garden Village.

The delivery of the Garden Village and associated infrastructure is not in any way linked or intrinsic to the delivery of West Eynsham SDA. Work is already underway on commencing the preparation of the comprehensive masterplan and the creation of a Developers Forum. A meeting with the key landowners and developers arranged by Eynsham Parish Council took place on 31 August to agree an approach to preparing a comprehensive masterplan for development at West Eynsham. Work on preparing the masterplan is expected commence soon.

Against this background, objection is raised to any recommendation for the need for an overarching (joint) infrastructure delivery plan between the proposed Garden Village to the north of Eynsham and the West Eynsham SDA.

Paragraph 14.10 sets out the preference of the Neighbourhood Plan for new development to be concentrated at the Garden Village. Paragraph 14.11 subsequently suggests that land to the west of Eynsham could remain as a reserve site.

The potential for phasing the delivery of housing at Eynsham is not supported in the draft Neighbourhood Plan Policy ENP14. It is furthermore not set out as part of the Neighbourhood Plan's recommendations. As such the text does not support the principles of the draft policy or follow through as a recommendation for the Council to consider further. There is no reference to the phasing of housing delivery in favour of the Garden Village in the WODC Local Plan.

For the reasons outlined above, and set out by Goldfield Estates in the recent Examination of the WODC Local Plan, the West Eynsham SDA will deliver new development in advance of the Garden Village. Goldfield Estates therefore requests that any reference to the phasing of housing delivery in favour of the Garden Village is deleted.

#### **ENP16 – North of A40**

Policy ENP16 confirms that land to the north of the A40 shall be safeguarded so that it remains available for development in the future. The policy seeks to adapt to potential alternative outcomes pending adoption of the West Oxfordshire Local Plan: (a) the creation of a new garden village and (b) if an alternative garden village site is pursued elsewhere the safeguarding of land for a future northern extension to the village.

The policy requires development of this area to be in accordance with a masterplan approved by WODC. This however does not reflect the requirements set out in the draft Local Plan which confirm that comprehensive development should be led by an Area Action Plan. Supporting paragraph 16.1(a) also identifies the Garden Village has capacity for up to 3,200 dwellings. This is significantly higher than the capacity identified in the associated Local Plan Policy EW1a. For consistency, we would

request that Policy ENP16 and the supporting text is amended to be consistent with the emerging Local Plan policy.

Goldfield Estates acknowledge that improving the A40 is critical to Eynsham and the whole of West Oxfordshire. Part C of Policy ENP16 requires vehicular access to be designed to minimise delays to through traffic on the A40 and make provision for future improvements to the A40.

The supporting text at paragraph 16.4, 16.24 and 16.25 refers to the need to rationalise junctions on the A40 and recognises that the new Park & Ride site proposed to the north of the A40 should be promoted as a transport hub for the district. Goldfield Estates is committed to fully assessing the transport impacts of any new development access onto the A40 and supports the Council's proposals for the Park & Ride.

The Park & Ride proposals will create a new junction onto the A40 and Goldfield Estates have been working with Oxford County Council to explore the opportunity of creating a strategic access, by way of a fourth roundabout arm into the West Eynsham SDA. The upgrade of this junction will enable full standard pedestrian and cycle crossings to secure sustainable connectivity between the West Eynsham SDA, Park & Ride and the existing Village as a beneficial gain for the local community. This would fully accord with the Recommendation 16 (E) of the Neighbourhood Plan.

### **ENP17 – Development of a western extension to the village**

Policy ENP17 identifies the principles for development to the west of Eynsham in accordance with a masterplan approved by WODC and in consultation with the Parish.

Goldfield Estates strongly support ENP17 and the principle of providing a western extension to Eynsham in line with the proposed Strategic Development Area (SDA) as set out in the West Oxfordshire District Local Plan. As explained in the introduction to this letter, Goldfield Estates control additional land (comprising approximately 0.96ha) adjacent to the northern boundary of the SDA. The Neighbourhood Plan does not define the extent of the development area to the west, however, in ongoing discussions with WODC, it has been confirmed that parcels of land contiguous with the West Eynsham SDA will be considered for development as part of the Masterplan process to determine whether it affords any additional development potential.

Goldfield Estates Ltd is committed to the early delivery of the SDA as part of a comprehensive masterplan approach in order to effectively secure the necessary infrastructure including the Western Link Road, measures to mitigate flood risk and also a new 1.5FE Primary School. Ongoing discussions are also taking place with the landowners and developers who either own or control the associated land parcels within the West Eynsham SDA including identifying the supporting technical work and other evidence required, the process for producing and agreeing the masterplan, and a programme for completing this stage of the planning process. In this regard, our client fully supports the objective of delivering the West Eynsham SDA to bring forward a high-quality development of the site through engaging with officers, members, key stakeholders, including the Parish and local residents.

Criterion A of Policy ENP17 sets out that developments west of Eynsham shall have vehicular access from the A40 at only one point and that vehicular access through the village shall be strictly limited. Paragraph 17.2 notes that access to the development should not cause extra delay to A40 traffic and that this may be achieved through the consolidation of existing nearby junctions or other means to minimise delays to both through and local traffic which shall be demonstrated by traffic modelling.

Goldfield Estates acknowledges the need for any access proposal to have due regard to the impact on the A40. However, concern is raised regarding the prescriptive and restrictive nature of Criterion A of Policy ENP17 in the absence of detailed transport assessments/modelling of all access options.

There are various potential access arrangements for the SDA which are the subject of ongoing assessment and should be considered alongside the development of the comprehensive masterplan. These include:

- Two points of access off the A40, comprising an access at the western edge of the SDA and a four-arm junction located further east, linked directly with the Park and Ride facility proposed

north of the A40. The additional land required for this potential link to the park and ride junction is within the control of Goldfield Estates.

With two points of access off the A40, the eastern access to the SDA linked to the A40 could potentially provide the Western Link Road access. Alternatively, this could be provided at the western edge of the SDA.

- A single point of access off the A40.

A single point of access could be located either at the western edge of the SDA or a more central access to link directly into the Park & Ride junction via land controlled by Goldfield Estates. Both offer the potential to also secure the delivery of the Western Link Road.

We would request that Criterion A of policy ENP17 is reworded to retain the necessary flexibility to appropriately consider all possible access arrangements for the SDA. In the absence of detailed technical consideration of the options above (and any additional options which could potentially emerge), it would be premature at this stage for the policy to remove this flexibility. Some suggested re-wording is set out below:-

*'A – Vehicular access to development west of Eynsham shall be informed by detailed technical assessments and traffic modelling. Access proposals should take the opportunity to link effectively to the A40 and existing road network on the edge of the village.'*

Subsequent criteria to policy ENP17 seek to ensure that development will sustain or enhance the significance of designated heritage assets, landscape features, rural setting and the transition of built form into the countryside and primary and secondary capacity. The supporting text to the policy also focusses on concerns regarding the impact of development on land to the south of Chil Brook.

Goldfield Estates acknowledge the sensitivity of the site's countryside setting and agree that the development of a comprehensive masterplan should be informed by a landscape and visual appraisal to determine the general location and scale of development and landscaping measures/green infrastructure within the SDA. Any subsequent planning application will also be supported by detailed landscape and visual impact assessments. Goldfield Estates further supports the need to work collaboratively with OCC and other consultees to ensure that the development is phased and brought forward in a comprehensive fashion and in accordance with the agreed masterplan, securing the necessary supporting infrastructure and facilities.

Recommendation 17 (Part A) states that *'development west of Eynsham should not be allowed to dilute to the rate of building of a separate settlement'*. The preference for the phasing of housing delivery at Eynsham is also alluded to in policy ENP14 (North of A40).

Goldfield Estates object to any statement which refers to the potential for phasing the delivery of development at Eynsham in favour of the Garden Village.

Land at West Eynsham, is within the control of small number of landowner/developer partners who are committed to collaboratively working alongside Eynsham Parish Council, WODC and OCC to support the early delivery of housing. Indeed, it was confirmed at the recent meeting with the Parish Council on 31<sup>st</sup> August 2017 that Goldfield agree to collaborate with other representatives present and that an early planning application is currently being prepared.

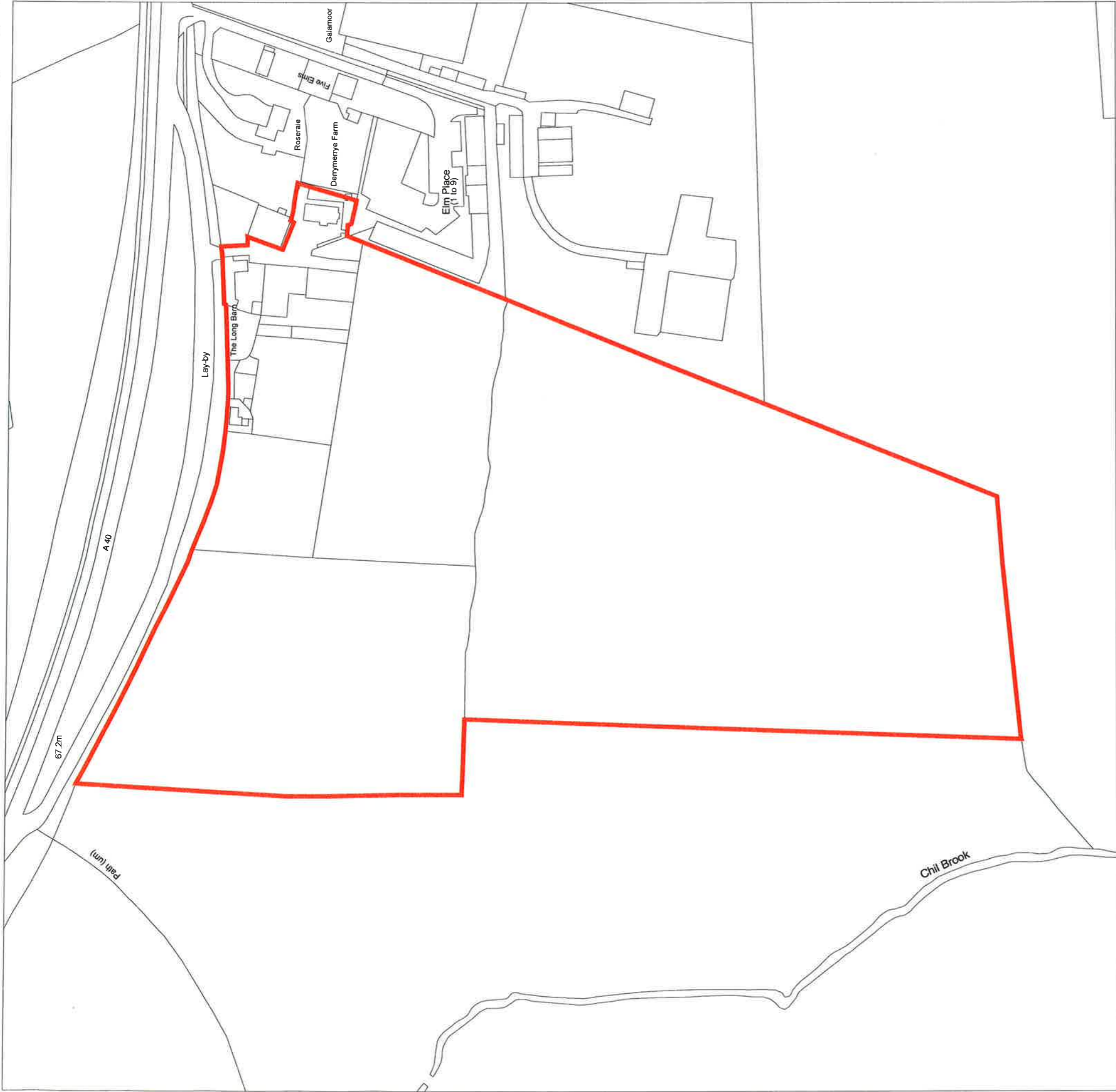
The shortfall in housing delivery across West Oxfordshire is increasing, with an accumulated backlog of 1,836 dwellings being reported by the Council in their Housing Land Supply Position Statement in October 2016 and an increased shortfall of 1,978 dwellings being reported in the latest Position Statement in May 2017 (an increase in the shortfall of 142 dwellings in 7 months).



Furthermore, Eynsham has been identified by the Oxfordshire Growth Board as a location to address Oxford City's unmet need. It is essential that homes are delivered to meet Oxford City's unmet needs at the earliest opportunity as the City's own housing monitoring indicates that between 2011 and 2016, they have only delivered 1,371 dwellings compared to the SHMA mid-point requirement of 7,000 for this period.

Consequently, unmet housing needs should begin to be addressed at the time of adoption of the Neighbourhood Plan and Local Plan: arguably now. Any attempt to phase or restrict the delivery of new housing at Eynsham should therefore be removed.

The scaling of this drawing cannot be assured  
 Revision Date Drn Ckd



Site Boundary  
 - 8.17Ha / 20.18Ac

Project  
**DERRYMERRYE FARM**

Drawing Title  
**SITE BOUNDARY PLAN**

Date	19.05.17	Scale	1:2,000@A3	Drawn by	J.W.	Check by	D.S.
Project No	27362	Drawing No	RG-M-01	Revision	A		



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