

**WEST OXFORDSHIRE DISTRICT COUNCIL  
EYNHAM NEIGHBOURHOOD PLAN  
CONSULTATION**

**REPRESENTATIONS  
ON BEHALF  
OF  
BERKELEY STRATEGIC LAND LTD**

**Carter Jonas**

incorporating Kemp & Kemp

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## 1.0 INTRODUCTION

- 1.1 Carter Jonas LLP is instructed by Berkeley Strategic Land Limited ("Berkeley") to prepare this submission in response to West Oxfordshire District Council's ("the Council") consultation on the Eynsham Neighbourhood Plan ("the Neighbourhood Plan").
- 1.2 Berkeley has under its control most of the land included in the proposed West of Eynsham Strategic Development Area ("SDA") allocation in the Council's emerging Local Plan 2031 ("the Local Plan").
- 1.3 The Neighbourhood Plan was prepared by the Eynsham Futures Steering Group (EFSG) and is broadly supported by Berkeley. It would however ask the EFSG to have regard to the matters highlighted below.

## 2.0 EYNESHAM NEIGHBOURHOOD PLAN

### The Village

- 2.1 Map 1 – 'Village Context' on page 4 of the Neighbourhood Plan shows a 'Proposed Western Extension Boundary' outlined in red. This boundary is different to the boundary of the proposed West Eynsham SDA as set out in the Local Plan. The EFSG will be aware that Neighbourhood Plans should be consistent and in general conformity with the Local Plan, especially regarding matters such as meeting up to date housing needs. EFSG will be aware also that the West of Eynsham SDA is allocated for the delivery of 1,000 homes, 550 of which will contribute towards the unmet needs of Oxford under the Council's 'duty to cooperate' with the remaining 450 contributing towards the Council's own identified housing needs. Accordingly, Berkeley would suggest that Map 1 is amended to show the correct SDA boundary. A copy of the Local Plan's Proposal Map for the West of Eynsham SDA can be found at **Annex 1** of this submission.

### Policies

- 2.2 The Neighbourhood Plan as drafted includes a number of policies which effect the West Eynsham SDA. These include:
  - ENP1 and ENP8 which suggest that any development located more than 1,000 metres from local services will by definition be unsustainable.
  - Policy ENP12 identifies an area on the West of Eynsham SDA to be preserved for 'Local Green Space'.
- 2.3 Berkeley notes also that paragraph 14.9 of the Neighbourhood Plan states that:

*"On the basis of the criteria set out in ENP17, it is considered that a future expansion to the west of Eynsham for 600\* homes are readily deliverable. Expansion south of the Chilbridge Road could have an adverse impact on the setting of the village"*
- 2.4 In addition, paragraph 14.11 states that:

*“Some land to the west of Eynsham could remain as a reserve site, something that the emerging WOLP noticeably lacks at present.”*

### **Sustainability**

- 2.5 Under the sustainability heading, it is too simplistic to measure a site’s sustainable credentials solely on the walking distance to the existing village centre, especially given its dual role, as identified in the higher order emerging Local Plan, of addressing West Oxfordshire’s objectively assessed need for housing and Oxford’s unmet housing need.
- 2.6 The West Eynsham SDA lies on the western edge of Eynsham, within walking and cycling distance of the wide range of shops, services, clubs and community facilities in the village. There are a number of public houses, cafes and restaurants, a medical centre, a pre-school nursery, a primary school and a secondary school in the village. Development of the SDA would bring with it new residents who would contribute to the viability and vitality of this Rural Service Centre.
- 2.7 The site is also close to existing employment areas within Eynsham including Oakfield Industrial Estate and Siemens. Moreover it has good access to Oxford (and the ‘knowledge Spine’) and Witney via the A40. Eynsham is the closest West Oxfordshire ‘Rural Service Centre’ to Oxford. It is also located just beyond the Green Belt on a Premium Bus Route.
- 2.8 The West of Eynsham development will support the sustainability of the village by investing in new and enhanced infrastructure, delivering affordable housing and supporting the local economy.
- 2.9 In short, Eynsham is the best location for housing to meet Oxford’s unmet need. It is also a highly sustainable location for growth in terms of meeting West Oxfordshire’s housing need.
- 2.10 The Local Plan is at an advanced stage. Stage 3 of the Examination in Public (EiP) concluded in July 2017 (the Council is required to carry some additional work by the Inspector which it hopes to complete later in the year).
- 2.11 The West of Eynsham SDA is a key strategic housing allocation in the (advanced) Local Plan. As such, Berkeley would respectfully suggest that it is not appropriate to have policies in the Neighbourhood Plan which directly relate to the SDA and could complicate or jeopardise the work done to date by the District Council on its own Local Plan.
- 2.12 If the EFSG has concerns over the West of Eynsham SDA, or has specific requirements for it, they should be raised through the Local Plan process; not through potentially conflicting policies in its Neighbourhood Plan. This is recognised in national planning policy. Paragraph 184 of the National Planning Policy Framework (NPPF) states:

*“Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to*

*support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”*

- 2.13 In particular, Berkeley is concerned at the suggestions in the Neighbourhood Plan that the development of the West of Eynsham SDA:
- Should be limited to circa 600 homes;
  - Should restrict development to principally the area north of Chilbridge Road; and
  - Should be served by a cul de sac off the A40.
- 2.14 There is a Local Plan requirement for the West of Eynsham SDA to deliver 1,000 new homes. Moreover, the landscape and visual baseline work carried out to date by Berkeley, which formed part of its submissions to the Local Plan Examination, has shown that there is scope in landscape terms to deliver that number of homes without affecting adversely the landscape character of the area.
- 2.15 As to access, even a scheme limited to 600 homes could not be served off a cul de sac; there is a clear requirement in transportation terms for a development road through the SDA linking the A40 with the B4449. A development road will also ease congestion in Eynsham village centre. Berkeley would also point out that proposed Local Green Space (LGS) 9 shown on Map 3 is on the likely route of the development road.
- 2.16 Berkeley supports a comprehensive masterplan approach to the development of the West of Eynsham SDA and would welcome input from the EFSG and Eynsham Parish Council.
- 2.17 Berkeley hopes it can work proactively with the EFSG. It has a proven track record in promoting and delivering large, complex strategic sites. Some of its current projects include 1,250 homes with associated services facilities and infrastructure on Land North-East of Bury St Edmunds; circa 500 homes at Abbey Barn South in High Wycombe; and 750 homes with associated services facilities and infrastructure (including a link road and a primary school) at Warfield, near Bracknell). All of these projects were master plan led.
- 2.18 Berkeley’s approach in dealing with large strategic sites is to take the lead on but to work constructively with Parish Councils, Local Planning Authorities and other stakeholders in developing comprehensive Masterplan/Development Briefs for its sites. That is the approach that it intends to take in respect of the West of Eynsham SDA.
- 2.19 To recap, the West of Eynsham SDA will:
- Assist in meeting the Council’s increased requirement for housing;
  - Be ideally placed to assist in meeting Oxford’s unmet need;
  - Deliver a site for a new primary school;

- Contribute by way of direct provision and financial contributions to -
  - improved community infrastructure (health, library provision, community buildings, sport and recreation provision, public open space, etc.);
  - secondary and special needs education provision
- Provide further support for the existing village centre and assist in the delivery of additional services and facilities within the strategic allocation;
- Assist in the delivery of a new road linking the A40 with the B4449 thereby reducing congestion in the village centre; and
- Open up opportunities for additional employment-generating development at and adjacent to the Oasis Business Park on the south side of the village.

### 3.0 CONCLUSION

- 3.1 The boundary identified for the West of Eynsham SDA on Map 1 – 'Village Context' in the Neighbourhood Plan should be amended to reflect the boundary shown in the Local Plan (see **Annex 1**).
- 3.2 National planning policy states that Neighbourhood Plans should be in general conformity with the strategic policies of the Local Plan. As such, it is Berkeley's view that the Neighbourhood Plan should not have policies which relate to the West of Eynsham SDA and could potentially conflict with SDA policies in the emerging Local Plan.
- 3.3 Berkeley does however support the Neighbourhood Plan's requirement for an overarching West of Eynsham SDA Masterplan and would welcome the opportunity to work with the EFSG and Eynsham Parish Council as that masterplan develops.

**Annex 1**

**West Eynsham SDA Local Plan Proposals Map**

