



WEST OXFORDSHIRE
DISTRICT COUNCIL

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 1st August 2017**, and closes at 5pm on **Tuesday 12th 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: **Nigel Pearce**

Organisation represented (if applicable): **Eynsham resident/EPIC (Eynsham Planning Improvement Campaign)**

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: **05 SPATIAL POLICIES, ENP 16 & 17**

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

1. Eynsham should not have to shoulder the whole burden of Oxford's 'unmet housing need'.

The Eynsham Neighbourhood Plan – *before and without* the Garden Village to the north or the enlarged extension to the west – envisaged 750 new homes in Eynsham. If you assume a conservative number of people per home, say 2.0, this increases the number of inhabitants by 1,500, from 5,000 to 6,500: a substantial increase of 30%.

Such an increase was designed by the Parish Council and Eynsham Futures to answer *local needs*. As you know, WODC has decided to dump *all* of its quota of Oxford's arguable 'unmet housing need' on one parish, Eynsham. Hence the 1,000 new homes in the West of Eynsham (550 for Oxford, leaving 450 instead of 750 for Eynsham) and the 2,200 in the Garden Village (all for Oxford).

However, given that about 30% of those in employment in Eynsham work in Oxford, the 750 that Eynsham has proposed would itself contribute to Oxford's housing need if future inhabitants follow the same pattern. Since 30% of 750 adds up to 225 homes, Eynsham is already doing its fair share towards the 'duty to cooperate' with Oxford, if not more so.

2. The Oxford Growth Board's population and economic growth projections are maximalist in nature, and represent a single deliberate choice rather than considering alternatives based on the whole spectrum of evidence

As a result, the Oxfordshire Councils have assumed a top-of-the-range 28% increase in population in West Oxfordshire, whereas ONS projections are less than half that – 12.7%. Of course, the reality may lie somewhere between the two, but population growth statistics have often proved to be exaggerated in the past, and may even fall below ONS's projections.¹

As for economic growth projections, unemployment is low in England as a whole, and even lower in Oxfordshire – under 4%. The Councils frequently tell us that the Oxfordshire economy is thriving. However, the creation of tens of thousands of new jobs may be unrealistically optimistic, post-Brexit. Where will the skilled labour force come from?

Net migration has fallen to its lowest level for three years. Many people leaving the UK are the kind of skilled workers Oxfordshire needs. As a spokesman for the Institute of Directors said recently, "Given unemployment is currently at its lowest level ever (4.5%), without the three million EU citizens living here, the UK would have an acute labour shortage."²

¹ See, for example, Jon Reeds, *Smart Growth: From Sprawl to Sustainability*: "Where, in this small island, in the next 45 years, are we going to find accommodation for a further 20 million people, or even more?" wondered Sir Colin Buchanan in his 1963 *Traffic in Towns* report. In fact, the population rose by about eight million in that period."

² BBC website, 24 August 2017.

3. The Garden Village site, and the southern part of the West Eynsham extension, are inappropriate for development

As you probably know, WODC commissioned a report from LUC to assess 36 sites around West Oxfordshire. They then added into the Local Plan, without any consultation, the two strategic development areas. This was disingenuous to say the least, because the southern half of the West Eynsham extension and the northern half of the Garden Village site *were not assessed* by the LUC. If they had been, their inappropriateness for development would have become abundantly clear.

Others with greater knowledge can comment further on West Eynsham. Suffice it to say here that, by building houses on either side of the Chil Brook, a functioning flood plain, not to mention a major new road, the Council is ignoring a significant increase in flood risk to hundreds of homes, both new and existing. The southern part of the site is also of archaeological importance, and is an area of access to open countryside that local residents greatly value.

As for the Garden Village site, the failure to assess the northern half resulted in serious and highly misleading omissions of information in the Expression of Interest sent to the HCA. The following were therefore missed in the EoI:

- An area of flood zone three on the northern edge of the site. (Local knowledge indicates that the Environment Agency underestimates the risk.)
- A cluster of Grade II listed buildings in a rural setting.
- A Site of European Importance for Arable Plants, designated by Plantlife in association with Natural England. (The whole of City Farm has been designated, not just the two fields bordering the site to the north. In any case, WODC has given away the fact that it wishes to expand the Garden Village further northwards in future.)
- The site of a rare abandoned medieval village and field system, together with an ancient salt road.
- The existence of a large aggregate recycling plant which was recently granted a permanent licence to operate. (This last is particularly surprising, as the plant is so substantial, with constant HGV traffic. As the agent acting for the plant pointed out during the public hearings, if the Garden Village had already been in place and there was space for an aggregate recycling plant where it is now operating, planning permission would never have been given for it to be built there.)

Furthermore, the southern half of the site is also inappropriate for large-scale development. As the public hearings revealed (and as I forewarned the HCA in September last year – to no effect), part of the area has mineral deposits of sand and gravel. Building there will either prevent this from ever being exploited, or will impose intolerable disturbance on new nearby inhabitants if it is exploited.

In addition, much of the agricultural land in the southern half of the site is of good quality. This is how the LUC report describes it:

This site is mainly greenfield land and the majority of the site (77%) is Grade 3 agricultural land. The remainder of this site (approximately 18%) comprises Grade 1 and 2 agricultural land and a smaller area (5%) is either Grade 4 or 5 or urban land. Therefore overall, it is assumed that development here would have a significant negative effect on efficient land use and preserving soil quality.

Although the LUC report does not specify whether the Grade 3 land is 3a or 3b, it does make it clear that: “The best and most versatile agricultural land (defined as Grades 1, 2, and 3a) *is considered to be a national resource and should not be lost* (para 4.47).” [My italics.]

It is also worth quoting a paragraph from the WODC Local Plan of particular relevance to both the Garden Village site and the West Eynsham extension:

The land based sector remains important to protecting home food production which is of increased importance as the world population continues to increase. In addition, this plays an essential role in reducing food miles and in shaping and maintaining the character of the countryside (6.35).

The proposed development on these two rural sites of high landscape, biodiversity and agricultural value flies in the face of the statements in the above paragraph and suggests that, along with much of the Local Plan that covers the environment, these words are entirely empty of any real meaning.

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 or posted **FAO Astrid Harvey, Community Development, West Oxfordshire District Council, Elmfield, New Yatt Road, Witney, OX281PB**, by 5pm on Tuesday 12th September 2017.