

**Capital Investment & Delivery
County Hall
New Road
Oxford OX1 1ND**

**EYNHAM NEIGHBOURHOOD PLAN
DRAFT FOR REGULATION 16 CONSULTATION**

RESPONSE ON BEHALF OF

**Oxfordshire County Council –
Capital Investment and Delivery**

Oxfordshire County Council (OCC) - Capital Investment and Delivery (Formerly Property and Facilities) welcomes the opportunity to comment on the Eynsham Neighbourhood Plan.

As you are aware the County Council owns a key proportion of the West Eynsham site and wishes to work effectively with all of the relevant stakeholders in the masterplanning and delivery of the site for 1,000 homes as set out in Policy EW1b of the West Oxfordshire Local Plan.

OCC Capital Investment and Delivery (CID) supports the general principles set out in the Neighbourhood Plan, but has the following comments on the policies as set out below.

The main body of comments relate specifically to:

Policy ENP17 Strategic Development Areas.

OCC CID supports the principle set out in Policy ENP17 that strategic developments shall be in accordance with a masterplan approved by WODC and in consultation with the Parish Council.

However the revised Submission Draft Neighbourhood Plan has added further criteria to the policy and OCC CID considers that this is a retrograde step which takes the policy too far in the direction of control over the West Eynsham Strategic Development Area (SDA) which is intended to be a masterplan led development. This level of detail and (in many cases) duplication of policy intent from Local Plan policies will serve to undermine the masterplan led approach. Furthermore, there is concern that the policy could end up not being in general conformity with the strategic policies in the Local Plan and in particular adopted Local Plan policy EW2.

Criterion (a) of Policy ENP17 seeks to limit vehicular access through the village to the new strategic sites yet this is not in accordance with the principles of accessibility and sustainable development. Furthermore it contradicts criterion (c) of policy EW2 which advises that

promoters should take “...the opportunity to link effectively with the existing road network on the western edge of the village...”

Criterion (b) of ENP17 is unnecessary since it not only duplicates criterion (j) of Local Plan policy EW2 but it also duplicates Local Plan policy EN9, the relevant criteria in the NPPF and furthermore it is not supported by specific evidence that suggests that any greater caution should be exercised compared to the normal policy approach in the specific case of West Eynsham SDA.

Criterion (c) of policy ENP17 adds little to Local Plan policy EW2 criterion (g) and the general landscape policies in the Local Plan including policies OS4 and EH2.

Criterion (e) of policy ENP17 duplicates Local Plan policy EH2 (second and third paragraphs).

Criterion (f) of policy ENP17 duplicates and weakens Local Plan policy EW2 criteria (d-f) and is therefore both unnecessary and arguably it undermines the strategic Local Plan policy. Education is a matter that is being resolved through detailed negotiations with the Education Authority to ensure that the development complies with the requirements of Local Plan policy EW2.

Finally, criterion (g) duplicates criteria (e-f) of the Local Plan policy EW2. A development of the scale proposed in Local Plan policy EW2 will be expected to deliver appropriate levels of new, supporting community infrastructure / facilities in accordance with the planning authority's infrastructure delivery plan and the requirements of the adopted Local Plan policies.

Both the West Eynsham and Garden Village sites should contribute to providing appropriate levels of open space and activities within the individual sites. It would not be appropriate for one site to provide significantly more than the other as this may adversely impact viability and jeopardise the timely delivery of housing.

Any provision would have to be based on an identified shortfall in facilities. Where possible it is preferred to improve current facilities unless this approach is found to be inappropriate in any detailed examination. The provision of facilities must also be analysed and balanced with appropriate walking distances to facilities and services. Where it is identified that there is a requirement for such uses, these could be accommodated integrated within the 'linear park' provision.

The removal of the illustrative linear park concept from the Regulation 14 Draft plan is supported. An appropriately scaled linear park could form the basis for an extended green infrastructure network to that which already exists into and across the site. There may be opportunities to enhance greenspaces in the wider area that would contribute to the sustainability of the SDA. Further work is required to identify any shortfall in provision and how it can be successfully accommodated to meet the needs of the West Eynsham site.

Policy ENP1

Policy ENP1 has now been revised from the previous consultation draft. The revised text is now supported, however the criteria regarding walking distances from existing services and facilities remains of concern.

As presently worded, this would potentially restrict parts of the West Eynsham allocation site in conflict with the adopted Local Plan. Such an approach would not be seen as a minor conflict and therefore would be considered that the Neighbourhood Plan could not meet the Basic Conditions requirements.

ENP 3, a, and b - Community Facilities

The requirement for infrastructure requirements and community facilities should be considered under the Infrastructure Delivery Plan. This is considered as the most appropriate mechanism to examine and deliver infrastructure based on an approved methodology. As currently worded, the Neighbourhood Plan policies may result in a conflict with any findings. Therefore, the level of detail should be revised accordingly.

In particular, the criteria relating to the requirement for allotments on the site would not be considered reasonable without further evidence to support it. This level of provision is considered to be excessively high and the calculation details presently shown are not considered sufficient to support such a requirement.

As set out above for Policy ENP1, details on walking distance should be reworded accordingly.

ENP 4a Enhancing Biodiversity.

The revisions to the criterion from the previous draft are supported. The appropriate details are to be through the masterplanning and SPD processes.

General Comments on all Policies relating to the West Eynsham SDA

In addition to the above, any policy reference such as ENP1, ENP3(a+b), ENP6, ENP7, ENP8, ENP12 and ENP14, which could prescriptively affect the West Eynsham site on matters such as the provision of community facilities, education, housing mix, siting, walking distances, road provision etc should be reconsidered. As it stands, these are inflexible criteria which may be in conflict with the objectives of the Adopted Local Plan housing allocation sites. It is intended that such sites are considered in detail through a masterplan approach, an Infrastructure Delivery Plan (IDP), and the emerging West Eynsham Supplementary Planning Document (SPD).

In this regard, it is requested that the criteria of such policies should be caveated to refer to the SDA specifically in relation to the forthcoming Infrastructure Delivery Plan and the emerging West Eynsham SPD.

These documents will be the main tools for influencing the detailed form of development to take place and will be based on a full masterplan approach drawing on consultation and participation with the local community and all relevant stakeholders including the Neighbourhood Plan Steering Group and Parish Council.

With regard to the wording of policy ENP17 Strategic Development Areas itself, the objective of the policy is supported and the following comments should be noted.

Criterion A which limits vehicular access through the village to promote sustainable transport methods, is supported to ensure that the village centre is not adversely affected by vehicular traffic.

The provision of well-connected walkable neighbourhoods which are integrated into the existing route network are essential. It is recommended that the overall masterplanning approach working in collaboration with WODC and OCC Highways should be referenced.

Criterion C requires that developments retain the rural setting of the village in terms of the long-term quality and stability of any new urban – countryside boundary. In addition to this Criteria D sets out that the form of any development should have regard to its impact on the rural setting of the village in terms of views from public rights of way.

The supporting text at paragraph 17.5 set out that:

“It has been an aspiration of WODC policy for many years to seamlessly blend the village into the open countryside beyond it to the west. Views west into open countryside and east back to the Parish Church and Wytham Hill are important features of Eynsham that contribute significantly to the rural feel of the village that is highly valued by residents. The methodology used in ‘Oxford View Cones Assessment’ is recommended in assessing the impact of any development.”

It is supported that the key views should be identified alongside appropriate landscape integration.

Supporting paragraph 14.9 is also of reference in this regard and states *“The total number of houses is set by the West Oxfordshire Local Plan (WOLP) (NPPF 184). However, expansion south of the Chilbridge Road could have an adverse impact on the setting of the village and requires an expensive crossing of the Chil Brook, a matter to be resolved when a masterplan is prepared”*.

It is considered that the wording is somewhat misleading and should recommend that a Landscape and Visual Impact Assessment (LVIA) will be required as part of the masterplan approach which will identify and inform sensitive areas of the West Eynsham site.

Criterion D goes further in adding that developments should include new paths to link in with the existing path network wherever practical.

Supporting paragraph 17.6 sets out that *“Public paths often provide popular access points to the countryside; the short time it takes to walk from ‘urban’ village streets into open countryside contributes very significantly to the perception of a rural location and is very important to retaining the ‘village feel’ of Eynsham given the lack of much internal green space such as a village green or park.”*

It is recommended that reference is made to the requirement for close collaboration with OCC to ensure essential to integration and provision of a well-used rights of way network.

Both criterion F and policy ENP6 Education specify that adequate Primary and Secondary School capacity shall be provided.

The supporting paragraph 17.12 sets out that *“Adequate school places for new residents are essential before any major development is occupied and the provision of appropriate land will be significant in achieving this goal.”*

It should be noted that in terms of school provision, more specifically siting, this should be located once further masterplanning work has been undertaken. In particular, it is essential that flood plain modelling is undertaken to ensure that any site proposed is appropriate.

Once work has been undertaken in this regard, the potential locations of any school site should be considered in early collaboration with the education team at OCC to ensure appropriate and effective delivery.

Therefore, in view of the complexities in delivering appropriate education provision, it is considered that such matters should not be shown within any concept plans or supporting text in the Neighbourhood Plan. Such work should be referenced as being part of the masterplan approach in conjunction with the education team at OCC.

Criterion G requires that large developments contribute wherever appropriate to the wider community by providing or enabling new facilities of which the village is currently in need.

In addition to general opportunities, Paragraph 17.13 sets out “Eynsham has been searching for a suitable site for a new burial ground with funds set aside for this purpose. This would be an ideal use for land that is too far from the village centre for residential development and could be integrated with necessary planting for visual barriers and the landscaping (although not the burial ground itself) could merge with the floodplain or other areas too sensitive for development. The Linear Park concept also makes use of land otherwise unsuitable for building development.”

It should be noted that the provision of appropriate community facilities should those identified within Local Plan policy EW1b and should be considered as part of the Infrastructure Delivery Plan. It should be clear that this provision should be proportionally split in terms of a financial contribution among both the West Eynsham and the Garden Village sites. It may however be possible to provide some of the facilities mentioned as part of the linear park approach if a need is identified. Whilst it is helpful that such facilities are listed, the inclusion of siting on the indicative concept plan of the West Eynsham site should be removed as this is not based on a full and detailed analysis.

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