

Matter 7 – Providing New Homes

Answer to 7.1

The identified objectively assessed need (OAN) does not present convincing and up-to-date evidence to justify 660 homes per year (mid-point figure) for the plan period. The OAN figure is obtained from the SHMA published in April 2014 (see para 5.8 of the WODC Local Plan) and does not take account of the first (July 2014) and second (November 2016) partial updates to Oxfordshire's Strategic Housing Market Assessment. The figures presented fail to consider updated demographic data on working-age people and the economic activity of West Oxfordshire District's population.

Additionally, the OAN assumptions presented in the SHMA and followed through in the WODC Local Plan cannot accurately reflect housing implications as they are largely based on (i) unproven unattributable population changes (UPC) and (ii) 'expected' high levels of immigration; (iii) they are job-led but have not been converted to Full Time Equivalent to provide a clearer means of comparing historic, current and assumed future trends in full-/part-time-casual job profiles; (iv) they are not based on up-to-date data and fail to present any details on scenario detail regarding demographic and economic implications of Brexit; and (v) they are not based on updated data.

Answer to 1.7.2

We are not opposed to growth, but we do question the rationale behind building 2750 dwellings from which the majority of residents will potentially commute to Oxford city on a daily basis. Specifically, the justification and assumptions for this development are either absent or justified with what can be considered old or poor factual data. To further complicate matters, the development of the 2750 houses in the Eynsham parish is integrated with the development of a huge business park. However, there is no evidence to suggest that development of health, education, transport and utility services will be aligned to the number of new houses.

Item 2.22 in the WODC Local Plan states that 'West Oxfordshire is better placed than many to deal with economic uncertainty'. We consider that this statement has no clarity regarding the economic and population growth assumptions and should be supported by robust and up-to-date evidence.

Answer to 7.3

The Local Plan's minimum housing requirement should be clearly identified but only when justified with up-to-date factual data and presented with accompanying long-term plans presenting timescales and funding provision analysis which guarantee sustainable implementation.

Answer to 7.4

(i) Justified?

The location criteria set out in policy H2 is not justified. Policy H2 is constrained by the 'general principles' stated in policy OS2. The general principles state that target development locations should 'not be at risk of flooding or likely to increase the risk of flooding elsewhere'. The proposed 'Cotswold Garden Village' document fails to identify that its target location is at risk of flooding (Flood Zone 3) from the City Farm brook to the north of City Farm.

As also identified by Nigel Pearce of 1 City Farm, Eynsham, in his paper entitled 'Cotswold Garden Village: A Case of Mistaken Identity', the proposed 'Cotswold Garden Village' document does not include the evidence shown on maps contained in the 'The West Oxfordshire Level 1 Strategic

Flood Risk Assessment 2016', that is:

(a) a high 'likelihood of surface water flooding' to the north and east of the Cotswold Garden Village proposed site;

(b) a wide strip to the east of the proposed site with 50%–75% susceptibility to groundwater flooding; and

(c) a large flood warning area at Eynsham Mill and below, immediately to the east of Lower Road in the proposed site.

(ii) Effective?

We have serious concerns regarding the effectiveness of the assumptions presented to justify the proposed location of the Cotswold Garden Village because they fail to identify key negative aspects of the proposed location. In addition to the flood risks to the north and east of City Farm, the proposed plan fails to identify:

(i) the rich wildlife in and around City Farm, which is now a Site of European Importance for Arable Plants as a consequence of non-intensive farming practices over several decades;

(ii) David Einig Contracting's large aggregate recycling operation; and

(iii) City Farm and its Grade II listed buildings.

Submitted on behalf of EPIC (Eynsham Planning Improvement Campaign), including Sandy Hellig and Nigel Pearce