

From: [REDACTED]
To: [Planning Consultation \(WODC\)](#)
Subject: WODC Consultation on Proposed Main Modifications to Salt Cross Garden Village Area Action Plan (CD7)
Date: 27 October 2022 19:17:07

Proposed Main Modifications to the Submission Draft Salt Cross Garden Village Area Action Plan (AAP) (CD7)

[REDACTED]

Along with other Oxfordshire residents community groups and national organisations ([Oxford Times](#)), I oppose the Planning Inspectors' proposed Main Modifications to the Area Action Plan. These proposals fly in the face of our local, national and global commitments to tackling our climate and ecological emergencies. I am outraged that they have removed the critical net zero targets from the planning documents that were so rigorously put together by WODC, working collaboratively with local residents (including myself) and Grosvenor. Moreover, these Government Inspectors have proposed devastating changes without giving any reasons for doing so. This is unacceptable.

I support the Joint response by EPIC and GreenTEA (see below) and conclude that the entire Plan is **unsound**.

[REDACTED]

The Planning Inspectors' Main Modifications to the Area Action Plan represent a massive missed opportunity to create a genuine 'exemplar' development and establish a high benchmark for all developments around the country to meet in future. The Plan, with the Inspectors' changes, does not do nearly enough to address the climate and ecology crises. The Council had set out a Plan that would have gone some way to addressing these crises and inspired others to do the same. The Planning Inspectors have put an end to that and made the entire Plan **unsound**.

They have introduced additions, deletions and changes of language throughout that have greatly weakened the original text. They have lowered standards and introduced loopholes that will allow developers to make excuses for not meeting them. The Plan has become open house for token gestures. It is also inconsistent as the changes to Policy wording do not reflect the detailed arguments, evidence and aspirations set out elsewhere in the Plan.

MM2/Core Objective GV3

It is particularly concerning, in the midst of an accelerating climate crisis, that the means of achieving net zero-carbon development have been deleted from this Core Objective. How can it be achieved if you remove "100%" (use of low and zero-carbon energy) and introduce a term as loose as "wherever possible" (in relation to no reliance on fossil fuels)? This change undermines the stated vision for the garden village: 'The Garden Village is an exemplar net zero carbon, energy positive development which meets the challenges of

climate change head on.’<!--[if !supportFootnotes]-->[1]<!--[endif]--> The NPPF requires a plan to “contain policies that are clearly written and unambiguous.” The new wording is unclear and ambiguous and do not reflect the requirement for *80% carbon reduction by 2035 and net zero by 2050*.

MM2 is therefore now **unsound**.

MM4/Policy 2 – Net Zero Carbon Development

Core Objective GV3 has been further weakened by the changes to Policy 2, which has been entirely rewritten without justification and is now inconsistent with the detailed arguments, evidence and aspirations set out elsewhere in the Plan and supporting documents. For instance it contradicts the recommendation for the zero carbon option as “the only scenario that achieves the level of energy efficiency and low- and zero-carbon energy generation required to meet climate change targets. It is also the only scenario that aligns with the aspirations of the Council and local communities.”<!--[if !supportFootnotes]-->[2]<!--[endif]--> The Council, local groups and residents, energy experts and others worked hard over a long period of time to get this right, but the Main Modification has taken the force and effectiveness out of the standards and removed the Key Performance Indicators. The TCPA has concluded that “the plan’s net zero objective is clearly in line with government policy, supported by the Sixth Carbon Budget which is itself enshrined in law and entirely consistent with the climate duty in the 2004 Planning Act and the powerful enabling law in the Energy Act.”<!--[if !supportFootnotes]-->[3]<!--[endif]--> It is this net zero objective that has been removed.

The NPPF requires a plan to “contain policies that are clearly written and unambiguous.” The new wording is reduced to a general aspiration and is thus unclear and ambiguous.

The NPPF requires a plan “to be shaped by early, proportionate and effective engagement between plan-makers.” This change and the lack of reasons for the change undermine the outcome of long and extensive public engagement. It no longer satisfies the NPPF requirement for a plan “be prepared positively, in a way that is aspirational but deliverable” as the means to deliver the net zero aspiration have been removed.

MM4 is therefore **unsound**.

MM12/Policy 7 – Green Infrastructure

The 50% provision of Green Infrastructure is likely to be unachievable if private gardens are included. They cannot be relied upon to stay green. Communal gardens can be included. The area of green roofs should be specified, so that they can be properly added to the total, and not left vague. Why have the Building with Nature standards been removed? This was a way of ensuring that 50% could be achieved. MM12 is therefore **unsound**.

MM15/Policy 9 – Biodiversity Net Gain (BNG)

The habitat in the Corpus Christi fields has been degraded since the land passed to a new manager. This may or may not be deliberate. Either way, it means that a future measurement of BNG will be from a much lower baseline than was the case just two or three years ago. A 25% increase in BNG will now be far less valuable than it would have been – unless the land is given time to regenerate naturally before the measurement is taken. If it isn’t, MM15 is **unsound**.

MM22/Policy 11 – Environmental Assets

This policy should apply to all development on the garden village site, not just major development. If it doesn't, MM22 is **unsound**.

MM24/Policy 14 – Active and Healthy Travel

The spine road should not just minimise severance of the site; it should avoid it altogether. Minimise is too vague a word and, in combination with MM27, makes MM24 **unsound**.

MM27/Policy 17 – Road Connectivity and Access

The spine road could easily become a permanent major through road and ruin the 'rural' and village atmosphere, particularly if the village is severed by it. It is therefore very disappointing to see the deletion of the intention to bisect it at a later date. It is also very hard to see why there has to be a through road at all (except for walkers, cyclists and buses), when there will be easy to access from both the east and the west. MM27 is therefore **unsound**.

MM35/Policy 22 – Housing Delivery

Why has the reference to exemplary design standards been deleted from an 'exemplar' development? This makes MM35 **unsound**.

MM40, 41, 44, 45 and 46 – on Custom and Self-Build Housing and Specialist Housing Needs

The language for these Policies has been seriously weakened, despite strong community support, making the MMs **unsound**.

MM54/Policy 30 – Provision of Supporting Infrastructure

Last but not least, there is the bombshell of MM54, the new paragraph that subordinates everything in the Plan to the possibility – or likelihood – of renewed "viability assessment" as and when developers and landowners feel that their desired profit margins and income are under threat. Nobody expects developers to make a loss, or landowners to receive a pittance. It is right that they make a living, but *not* a killing. Viability is so vague a term in this context that it needs precise definition and public participation in its assessment. Without this, MM54 is **unsound**, as is the whole Plan.

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<!--[endif]-->

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From: [REDACTED]
To: [Planning Consultation \(WODC\)](#)
Subject: Re: WODC Consultation on Proposed Main Modifications to Salt Cross Garden Village Area Action Plan (CD7)
Date: 02 November 2022 11:09:23

Dear Planners,

In addition to my email AAP consultation response dated 27th October, I would like to register my concern that the Inspectors' striking out the KPIs in AAP Policy 2 actually meet the recommendations set out recently by the United Nations in their recent [Emissions Gap Report 2022: The Closing Window – Climate crisis calls for rapid transformation of societies](#). This report 'finds that the international community is falling far short of the Paris goals, with no credible pathway to 1.5°C in place. Only an urgent system-wide transformation can avoid climate disaster;' 'Wide-ranging, large-scale, rapid and systemic transformation is now essential to achieve the temperature goal of the Paris Agreement' and 'the transition needs to be initiated at an accelerated pace immediately, everywhere.' This means taking immediate action as set out in Table 5.7 of the UN report.

1. EFFICIENT BUILDING SHELL: Optimize building shells to minimize the need for active heating and cooling.
2. SCALE UP ZERO-EMISSIONS HEATING AND COOLING TECHNOLOGY: Highly efficient air conditioners and heat pumps without hydrofluorocarbons can be powered by renewables, either on-site or supplied off-site through electricity.
3. ALL NEW BUILDINGS SHOULD BE ZERO CARBON IN OPERATION: New buildings should be designed and constructed so that they are zero carbon in operation, with a minimal energy demand that is met through zero-carbon sources.
4. MINIMIZE EMBODIED EMISSIONS: Emissions from construction materials should be minimized by reducing the emissions intensity of steel and cement production and substituting lower carbon materials, including recycled materials, where possible.

These are actions consistent with those set out in the original AAP Policy 2 which the Inspectors have removed.

I would appreciate an acknowledgement of my original response and this later addition.

Many thanks,

[REDACTED]

[REDACTED]

On 27 Oct 2022, at 19:17, [REDACTED] wrote:

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