

## Pre-Submission Draft Salt Cross Garden Village Area Action Plan

### Consultation Representations Received



This document sets out responses submitted to the consultation on the Pre-Submission Draft Area Action Plan which was undertaken in August 2020.

You can scroll through the responses or click on a name below to view a particular response.

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**From:** [REDACTED]  
**To:** [Planning Policy \(WODC\)](#)  
**Subject:** Salt Cross Garden Village - Area Action Plan Consultation  
**Date:** 21 October 2020 15:18:08

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I wish to respond to the AAP consultation for Salt Cross Garden Village that is currently underway. I would be grateful for acknowledgement of this submission.

I consider the AAP unsound because the plan is unjustified, and has failed to take into account reasonable alternatives. In particular the location of the GV, in close proximity to Eynsham, fails to acknowledge the negative impact it will have on Eynsham or its failure to meet the definition of a 'garden village' as a result of that proximity.

31/01

The plan states that Salt Cross will be a 'new standalone settlement, self-contained with its own village facilities, such as schools, community resources and employment opportunities, taking proper account of environmental considerations...' However, secondary school provision will not be 'standalone', as it will be a 'satellite' for Bartholomew School in Eynsham, requiring constant student flow from one site to the other. It is also unclear whether there will be a healthcare facility in Salt Cross, or whether early residents will seek to register with Eynsham Medical Centre, which is already overstretched and beyond capacity. The AAP itself states that the GV 'will have a distinct identity but will be connected with Eynsham to the south...' and speaks of the social interaction between Salt Cross and Eynsham that the plan seeks to facilitate. The plan makes clear that it envisages permanent connectivity between the two sites, which does not accord with the self-sufficient definition of a garden village.

The AAP has many laudable objectives, but they are aspirations with little hope of delivery or enforcement. For example, 10.23 states that 'subject to viability considerations, Salt Cross will provide 50% affordable housing'. In the last four years, according to Grosvenor's outline planning application (doc. *Affordable Housing Statement*, para 4.10), the percentage of affordable housing delivered in West Oxfordshire has declined from 37% to 29% against a target of between 35% and 50%. Grosvenor's application states that the 'composition and proportion of affordable housing [is] to be determined by the viability appraisal work'. Clearly the viable considerations are very unlikely to result in a development with 50% affordable housing.

If the AAP has any teeth, Grosvenor's planning application should be thrown out immediately. It fails to deliver on any number of objectives set out in the AAP. As the submissions from Thames Water, Stagecoach, and the Environment Agency to Grosvenor's planning application make clear, Grosvenor's plans for water management, transport, and biodiversity are woefully inadequate.

31/01  
cont.

The AAP states that 'to avoid negative cumulative impacts of development on flood risk within the site, Eynsham and the wider Thames catchment, development will need to achieve a reduction in greenfield run off rates'. Thus far Grosvenor has shown minimal

engagement with Thames Water, and there is no indication of how it proposes to achieve the reduction that the AAP says will be needed. Thames Water also says that the existing sewage treatment works and foul water network infrastructure are unable to accommodate the needs of the development; what guarantee is there that the AAP will make these vital upgrades a condition of approving a planning application?

Stagecoach's damning submission has 'very grave concerns about the content of [Grosvenor's] application'. Contrary to the aspirations set out in the AAP to discourage car use and encourage walking, cycling and the use of public transport, Grosvenor's planning application design 'does not optimize bus access or delivery, nor does it provide for high quality access by all sustainable modes, especially bus and cycling'. Additionally, Grosvenor's proposals fail to accord sufficiently with national policy as set out in the National Planning Policy Framework, and conflict with them inasmuch as opportunities to promote walking, cycling and public transport are not fully or properly identified and pursued. 'Appropriate opportunities for avoiding and mitigating any adverse effects of traffic and transport associated with the development have been underplayed, or entirely overlooked.' This will not deliver the environmentally friendly movement of people that the AAP proposes.

31/01  
cont.

The AAP aspires to a minimum biodiversity net gain of 25%. Grosvenor's plans will result in a 4% net gain, which does not even fulfil the mandatory 10% legal minimum. The Environment Agency also has concerns about Grosvenor's approach to protected species and contaminated land.

The construction of Salt Cross goes hand in hand with the expansion of the A40 and the provision of a Park & Ride at Eynsham. The AAP recognizes that development at Salt Cross will have an impact on the A40 and 'there will be remaining problems during peak periods' (8.58) and proposes to deal with this by behavioural changes in the populace. However, we have seen how the impact of the pandemic initially led to a drastic reduction in road traffic and consequent improvement in air quality, but that these improvements were soon lost as people reverted to their old patterns of behaviour. To assume that congestion on the A40 will be reduced by persuading people to reject car use and switch to bicycles or buses (especially when the avoidance of public transport is now an ingrained habit) does not provide a concrete or realizable solution.

The AAP makes much of the Eynsham Neighbourhood plan and its desire to 'protect the character and community of Eynsham'. It suggests that 'positive gains are also secured for nearby Eynsham', but nowhere in the AAP are there provisions to secure Eynsham's future. It claims that because Eynsham has relatively limited provision of green space, access to new green areas in the GV will be beneficial. But in order to provide this new green space, a huge area of accessible countryside is being destroyed, and access to the GV involves crossing the busy, noisy, polluting A40; at the same time, the West Eynsham development that is also at the planning stage is curtailing the access to the countryside that Eynsham residents currently enjoy.

The AAP speaks of air quality concerns from traffic on the A40, and the need for noise mitigation from the A40 (7.113 and 7.114), but only for Salt Cross residents – not, apparently, for Eynsham.

There are no positive gains for Eynsham in a massive development on its doorstep that will increase traffic, pollution, flood risk, and noise, and destroy the environment and biodiversity. There needs to be a second AAP for Eynsham, that sets out in as much detail exactly how Eynsham will be protected from the negative impact of Salt Cross, both during construction and thereafter. There are other sites where a development on this scale could have been built, closer to Hanborough station, for example; there is also considerable uncertainty about the scale of housing needed in the coming years, and the accuracy of the forecast to which the county is working. The climate emergency that we are enduring, and the destruction of the natural world, demand that new developments should not depend upon expanding infrastructure, like the A40, that will only increase road use and make it harder to protect our environment.

31/01  
cont.

I would be grateful to be kept informed of the progress and outcome of the AAP process.

Judith Luna

[Redacted signature block]

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**From:** David Miles [REDACTED]  
**Sent:** 30 August 2020 17:48  
**To:** Planning Policy (WODC)  
**Subject:** SALT CROSS GARDEN VILLAGE

I am responding to the consultation in my capacity as Transport Representative for Witney.

I have previously responded to the consultation process so will try to keep comments short and concentrate on transport issues.

Salt Cross will be built and I am working on that assumption. Whether it is built as a giant extension to Eynsham or as a genuine Garden Village is still to be seen however. 32/01

I am pleased that public transport provision is considered in the Area Action Plan as there have been too much local development where it is an afterthought. I note that a group may be formed to plan this and I welcome that.

Stagecoach already run regular services to Oxford and all of these are likely to serve the new park and ride. The S1 will then continue to travel through Eynsham Village so the S2 and S7 are likely to be more important to Salt Cross. Their current hourly frequency is likely to be considerably increased.

These through services may divert slightly off the A40 but only to serve the main centre of the development. This will be dependent on the roads being wide enough for double deckers to operate. Any time consuming routes will not be attempted so it is vital to get this right.

There is also an identifiable need for local services through the development and linking it with Eynsham Village and Hanborough Station. This may be provided by a community transport operator or another bus company.

There is a pressing need to reconnect Eynsham to Hanborough but it is important not to overstate the importance of Hanborough Station to Salt Cross. Most users of public transport would use the bus not the train to get to Oxford. This would only change if a branch line was built from the North Cotswold Line with a possible terminus at the park and ride. This would be an expensive option but also one very much in keeping with the ethos of a Garden Village. 32/01 cont.

It is very important that in any discussions on public transport provision that all stakeholders are involved. By that I mean local Parish Councils, PTRS and bus operators. I think everybody wants to see Salt Cross succeed whether or not they supported it initially.

The would be developers at Barnard Gate made assumptions that Stagecoach would stop on the A40 without lay-bys being constructed and divert services automatically. It would be wise not to make those sort of assumptions but to thoroughly engage from the outset.

I have been the Parish Transport Representative for Witney for almost 30 years and are also a volunteer with West Oxfordshire Community Transport. I therefore have a long history of working with local councils and bus companies. This includes route planning and timetables, an example of which is the Witney Town Service.

When I attended the presentation event I identified myself and offered to help should this felt to be needed. My details were taken and a meeting suggested but nothing transpired. The offer remains however.

32/01  
cont.

I would like the best possible service for Salt Cross and I see this as an opportunity to improve services in the immediate area. If new residents are to be encouraged to use public transport it needs to be in place early and at the right level.

I am always available to be contacted via email or phone on [REDACTED]. Please feel free to do so if you think it helpful.

DAVID MILES  
WITNEY PARISH TRANSPORT REPRESENTATIVE

Representation received by: Steven Newman

Dated: 1 September 2020

AAP Section: Proposals map

Question:2 First Name	Question:3 Last Name	Question:9 To which part of the area action plan does this representation relate?	Question:9 To which part of the area action plan does this representation relate?  Comment	Question:10 Do you consider the AAP to be legally compliant?	Question:11 Do you consider the AAP to be sound?	Question:12 Do you believe the AAP complies with the duty to co-operate?	Question:13 Please give details of why you consider the Area Action Plan is not legally compliant or is...	Question:14 Please set out what modification(s) you consider necessary to make the Area Action Plan legally...	Question:15 If your representation is seeking a modification, do you consider it necessary to participate...
Steven	Newman	Proposals Map		Yes	Yes	Yes	I would like to support the legal compliance of the AAP.		No, I do not wish to participate at the oral examination.

**From:** [REDACTED]  
**To:** [Planning Policy \(WODC\)](#)  
**Subject:** Salt Cross Area Action Plan  
**Date:** 21 October 2020 15:51:48

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I am writing with regard to the Salt Cross AAP, as it apparently does not include Bladon as an area that could be affected by construction of Salt Cross. The A4095 runs through the middle of Bladon and there will be significant adverse effects if construction traffic is allowed to use this road. I therefore ask that you ensure no construction traffic uses the A4095 (and then Lower Rd) to access or leave the Salt Cross site.

The amount of heavy traffic already using the A4095 is already a cause of major concern, for both safety and pollution.

34/01

The A4095 is very close to a number of houses and the primary school, where air pollution levels have been recorded at illegally high levels on several instances. Air pollution has a serious detrimental effect on health, especially for young children. Increasing the amount of heavy traffic will make this problem worse. More heavy traffic will also mean more noise pollution, which is also recognised as being detrimental to health.

There is a very tight bend on the A4095 in Baldon, where two lorries cannot pass each other without one mounting the pavement. The pavement is narrow and it is therefore dangerous to pedestrians. It is also a very dangerous section of road for cyclists as many vehicles try to squeeze past, and have to swerve back in when there is something coming the other way. This has happened to me on several occasions and I have had to take evasive action to avoid serious injury or death. The A4095 through Baldon is a renowned black spot on the national cycle network, and prevents two routes (NCN 5 and NCN 442) being officially joined. The council should be encouraging carbon-free travel, and keeping heavy traffic off roads that go through villages would be an excellent start.

Bladon also attracts many visitors to Churchill's grave, and events at Blenheim also use the A4095 for both visitors and contractors.

Please put the health and safety of residents first and keep Salt Cross construction traffic off the A4095.

Thank you

Elizabeth Owen

**From:** [REDACTED]  
**To:** [Planning Policy \(WODC\)](#)  
**Cc:** [REDACTED]  
**Subject:** Salt Cross Area Action Plan  
**Date:** 20 October 2020 11:37:13

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We wish to support the concerns expressed by our District Councillors, Julian Cooper and Elizabeth Poskitt, in relation to the Salt Cross (Eynsham Garden Village) AAP with regard to the effects on the village of Bladon and surrounding areas which have apparently not been taken into account.

We would ask that you ensure that construction traffic for the development site in Eynsham is prohibited from using Lower Road, the A4095 and the A44. This route is already a “rat run” when there is congestion on the A40. The volume of heavy traffic has increased markedly in recent years, as has both the size and weight of the vehicles, and is already cause for considerable concern. The A4095 through the village of Bladon has a tight bend which means 2 lorries are not able to pass each other and lorries often force cars to stop or mount the pavement. The road passes very close to a large number of houses and also to the local primary school. On several occasions pollution levels near the school have been recorded at levels higher than acceptable and the aim should be to decrease pollution levels not increase them.

35/01

There is only one controlled pedestrian crossing on the A4095 in Bladon which many children have to use to reach the school and the village play ground, as do the many visitors coming to see Winston Churchill’s grave and the memorial window in the Church. Furthermore, this crossing is sometimes temporarily out of use when there is an event at Blenheim which involves vehicles (some very large) accessing the Palace grounds via the Bladon Gate, yet another cause for concern.

In addition, the noise level already created by large heavy lorries being driven through the village from early in the morning to late afternoon is unacceptable. Many vehicles also begin to accelerate before they leave the village, heading toward Hanborough, and are breaking the speed limit long before they pass the last houses in the village. The situation will be exacerbated by the anticipated increase in construction traffic.

Cycling through or to the village is not an enjoyable experience and will be made more dangerous by an increase in the level of heavy traffic which would undoubtedly be generated by allowing construction traffic for Salt Cross to travel through the village. There is apparently no plan to provide a cycle route through Bladon joining up the national cycle routes in the area.

For many years, villagers have asked that the A4095 be downgraded to a B road in order that a weight restriction can be imposed but the answer has always been that it is too expensive. Maybe it’s now time to consider the well-being of the villagers rather than the convenience of commercial traffic. We would ask that at least you ensure that the route is not even more of a “rat run” than it currently is for heavy traffic

Michael & Hilary Owen

(Bladon residents)

## Planning Services

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Planning Policy Team  
West Oxfordshire District Council

19<sup>th</sup> October 2020

Your ref: Salt Cross AAP Garden Village

Our ref: Submission Response

Dear Giles

### **Response to Salt Cross AAP Garden Village – Submission Response**

Oxford City Council supports the submission of the Salt Cross Area Action Plan (AAP) for the Garden Village. The City Council have continued to work actively and collaboratively with West Oxfordshire and through the Growth Board to help bring forward the development of this site.

36/01

This site for the 'Garden Village' together with land west of Eynsham were the two key strategic sites identified by the 'joint working' arrangements with the Growth Board and then subsequently taken forward in the West Oxfordshire Local Plan 2031 to help support the delivery of Oxford's unmet housing need, of which the apportionment agreed was 2,750 dwellings. It is therefore important to consider the amount, type and delivery of affordable housing on the 'Garden Village' site in relation to what will be expected to come forward on the land west of Eynsham. Whilst both of these key strategic sites are required together to deliver affordable housing, they each have an individual responsibility to make their own significant contribution to meeting Oxford unmet need.

### **Policy 22 (Housing Delivery)**

The City Council fully support the total number of new homes expected to be delivered at the Salt Cross 'garden village' site, which is required to make the Plan sound and make a significant contribution to helping to meet Oxford's unmet housing need. This is in accordance with the working assumption target, 2,200 homes, set out in the West Oxfordshire Local Plan 2031.

36/02



## Policy 23 (Housing Mix)

The City Council fully support this policy which seeks to deliver a balanced mix of private and affordable housing types that is required to make the Plan sound. In addition the following detailed representations have been made in support of specific paragraphs to make the Plan sound, which are set out in the supporting text that relate to type and balanced mix of affordable housing and in relation to the overall housing allocation, set out below:

36/03

### **The type, size and cost of affordable homes** (paragraph 10.43)

The City Council support the wording in this paragraph, which recognises that this site allocation was made in response to Oxford's unmet housing need and can confirm that discussions are continuing with West Oxfordshire District Council to determine an appropriate way forward. It is considered to be necessary to make the Plan sound.

36/04

### **Balanced mix of affordable housing** (paragraph 10.44)

The City Council note that this site does lie within West Oxfordshire and whilst its allocation is to help meet Oxford's unmet housing need *'it would be inappropriate to restrict occupancy of affordable homes provided solely to one of the local authorities' housing registers'*.

36/05

Nonetheless the City Council welcomes the on-going dialogue between both Planning and Housing Officers to ensure that agreement is reached on issues around the delivery of Oxford's unmet housing need and in particular to ensure that the type and tenure of dwellings in greatest need are properly reflected in the balanced mix of dwellings that come forward on this site.

### **Housing allocation** (paragraph 10.45)

The City Council can confirm that discussions are still continuing with West Oxfordshire District Council over the allocation of new affordable homes. The aim being for the new homes to be offered to those on both the West Oxfordshire housing register and on Oxford City Council's register. The approach being pursued by both parties is that this would be achieved through *'a combination of new-build affordable properties at Salt Cross and re-letting a proportion of existing affordable stock in the Eynsham / Woodstock sub area to residents of Oxford City.'* A memorandum of understanding is being prepared on this basis.

36/06

It is however important through these continued negotiations for West Oxfordshire to seek the successful delivery of the highest possible proportion of affordable homes and in particular 'social rented' homes from both this 'Garden village' development and the other strategic site on the Land West of Eynsham to help meet Oxford's identified housing need.

## Figure 8.1 (Movement and connectivity Strategy)

36/07

The City Council fully support the key overarching principles set out in Figure 8.1 of the movement and connectivity strategy, which are important to make the Plan sound. These include the use of sustainable travel modes both within the site and the provision of good walking, cycling and public transport connections which are proposed to be provided for the wider area, including



Oxford. This is required both to positively respond to the climate change emergency and to ensure that there are good transport connections to and from Oxford, since this site will be an important role in helping to meet Oxford's unmet housing need. It is therefore essential that appropriate transport facilities are provided to ensure future occupiers of this housing development are able to travel to Oxford for work, leisure and to visit family and friends.

### **Policy 14 (Active and Healthy Travel)**

The City Council fully support the active and health travel approach set out in Policy 14, which is required to make the Plan sound. This builds on the movement and connectivity strategy and recognises the importance of providing improved links to the external pedestrian and cycle network and in particular improvements to walking and cycling both along the A40 and potentially linking to the Oxford North development together with improved links to Hanborough Train Station, which serves Oxford. These are considered to be necessary to ensure that sustainable travel options for walking and cycling to Oxford and or transport hubs that serve the city are made available.

36/08

### **Policy 15 (Public transport)**

The City Council support the proposed improvements to the provision of public transport and in particular strengthening the connectivity and services by both bus and rail to Oxford. This policy is considered to be necessary to make the Plan sound and will help ensure that sustainable travel modes are promoted to and from the garden village to Oxford.

36/09

### **Policy 30 (Provision of supporting infrastructure)**

The City Council fully support Policy 30, which requires the provision of supporting infrastructure, which is necessary to make the Plan sound. A key element of the successful delivery of this site will be the need to have joint infrastructure and investment plans in place and is required. It is therefore critically important for local authorities to continue to work together through collaborative 'joint working' arrangements to ensure that the proposals coming forward are supportive of one another. The Oxfordshire Growth Board continues to provide an effective mechanism to achieve this joint working and to enable this site to make a significant contribution to meeting the Housing and Growth Deal with Government and helping to meet Oxford's unmet housing need.

36/10

### **Part 4 (Measuring progress, how will we know if we've succeeded)**

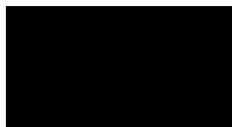
The City Council fully support the approach being taken in Part 4 of the Plan to monitor the delivery of the Plan and is necessary to make it sound. However as part of the monitoring of the development of this site is important in assessing its contribution to delivering Oxford's unmet need. There should also be a commitment to monitor the progress in the delivery of Oxford's unmet needs and in particular the affordable homes. This could then feed into the Annual Monitoring Report (AMR) prepared by West Oxfordshire.

36/11

I hope these comments are helpful and we look forward to working with you collaboratively on the delivery of this important project.



Yours sincerely,



**Adrian Arnold**

**Head of Planning Services**



**INVESTORS  
IN PEOPLE**





Re: Salt Cross Garden Village - Area Action Plan Consultation Response

23rd October 2020

To whom it may concern

We would like to make a response on behalf of the Oxfordshire Community Land Trust. Our comment refers specifically to paragraph 11.88 and 11.89:

*“11.88 At the preferred option stage of the AAP in 2019, two broad options were considered in relation to future stewardship and maintenance at the garden village; either to utilise an existing organisation such as the Wychwood Project or the Woodland Trust, or to establish a new organisation such as a Garden Village Trust.”*

37/01

*“11.89 Based on further discussions since that stage, the District Council has concluded that a combination of these two options is likely to be the most appropriate way forward. In the short-term, an existing, established organisation such as the Land Trust would be used as an 'intermediary', offering initial support, advice and management expertise, until such time as a new Salt Cross Garden Village Trust can be established once there is a sufficient 'critical mass' of new occupants.”*

37/02

Oxfordshire Community Land Trust welcomes the proposal of a Community Land Trust as a mechanism for delivering the garden village. We would be interested to be named as a potential intermediary in the latter paragraph as an organisation who could support the early phases of development. As the local umbrella CLT we would build upon 16 years of experience across the county, including in supporting other local CLTs to set up.

OCLT is a Community Benefit Society whose role is to both develop homes and encourage the replication of the CLT model across the county. Therefore it would be an appropriate organisation in mission and structure for applications for early stage funding to give the new Village Trust strong foundations for the future.

OCLT is currently in the detailed application stage of becoming a Registered Provider of social housing which will allow it to take on funding for affordable homes and have the appropriate financial and governance standards to partner with any new CLT in the management and maintenance of the Salts Cross neighbourhoods and any assets in community ownership.

If needed, we would be willing to send a delegate to support in the representation of the CLT model at any future hearing.

Yours sincerely,

Fran Ryan

Secretary  
on behalf of OCLT Ltd



**OXFORDSHIRE  
COUNTY COUNCIL**

**Reference: West Oxfordshire District Council,  
Salt Cross Garden Village Area Action Plan**

**Communities  
County Hall  
New Road  
Oxford  
OX1 1ND**

**Susan Halliwell  
Director for Planning & Place**

**17 November 2020**

Dear Sir/Madam,

**Re: Salt Cross Garden Village Area Action Plan (Pre-submission Draft) –  
Representation from Oxfordshire County Council.**

Oxfordshire County Council (OCC) welcomes the opportunity to comment on the Salt Cross Garden Village Area Action Plan (AAP) and supports the delivery of Policy EW1 of the West Oxfordshire Local Plan 2031 in line with the AAP and Garden Village design principles. Salt Cross has been the subject of on-going partnership working between OCC, West Oxfordshire District Council (WODC) and Grosvenor Developments Ltd, and is seen as a significant opportunity to develop an exemplar, sustainable and high-quality development.

38/01

OCC has previously provided comments during the drafting process for the AAP, most recently at the Preferred Options stage (September 2019) and we are pleased to note that our comments have been considered in the Pre-submission Draft. We continue to work collaboratively with WODC and we have appreciated the partnership approach to AAP development particularly on aspects such as movement and connectivity.

OCC welcomes the detail included in the AAP in relation to the Transport Strategy for Salt Cross. We are fully supportive of the Movement and Connectivity Key Principles, the Key Design Principles and the focus throughout the document on best practice in place-making to ensure that the Garden Village is a truly sustainable development in transport terms.

As detailed in the AAP, Salt Cross is in an excellent location to benefit from the significant public sector investment that has been allocated to deliver sustainable transport infrastructure along the A40 corridor including eastbound and westbound bus lanes; improved cycling and walking connections; capacity improvements between Witney and Eynsham; and a new Park & Ride site located within the garden village site which will form the focus of a new 'Sustainable Transport Hub'. This new infrastructure and associated bus service improvements will greatly improve the attractiveness of sustainable travel options relative to the car for journeys along the A40. Salt Cross will also benefit from proposals to enhance the train service at nearby Hanborough Station, providing opportunities for local and longer-distance travel by train, including direct rail links to South Oxfordshire, the Thames Valley and Central London. Collectively, these measures present a significant opportunity for

ensuring sustainable travel behaviours are embedded and adopted by residents of Salt Cross from the outset, and OCC is pleased to see that comprehensive policies are included within the AAP to deliver these initiatives and this essential infrastructure.

38/01  
cont.

The A40 Corridor improvements being delivered through Local Growth Funding (LGF) and the Housing Infrastructure Fund (HIF) are key to making the Garden Village acceptable in planning terms. Salt Cross and three other developments (West Eynsham Strategic Development Area (SDA), East Witney SDA and North Witney SDA) are dependent upon delivery of the A40 corridor capacity and improvements. The recovery of a proportion of the funding from these developments is an important Government requirement for this infrastructure investment.

In addition, as the improvements are funding through public funds, from a State Aid perspective, recovery of monies from the Garden Village and other developments towards the A40 improvements must be demonstrated. Securing contributions towards the infrastructure is therefore essential and OCC is pleased to see this requirement reflected in the AAP policies.

The provision of a comprehensive network of inclusive walking and cycling routes is also welcomed and the Council fully endorses the requirement to provide a grade-separated crossing at Eynsham to ensure that the A40 does not create a barrier to sustainable travel behaviours and provides a safe environment for children to cross between settlements. At the time of writing OCC is assessing how the construction of the underpass could be integrated with the HIF2 programme to minimise disruption on the A40 and potentially bring about cost savings. Current cost estimates for the underpass if delivered as part of the wider A40 proposals are in the region of £8m to £8.25m.

OCC strongly supports the emphasis on Healthy Place Shaping and the health and wellbeing priorities which are integrated throughout the document. We also strongly support the AAP's commitment to climate action, which aims to deliver a net-zero development.

We strongly welcome reference to the Circular Economy, although we suggest greater consideration is given to increasing the range of options further up the waste hierarchy. We also note the impact that waste collection can have on carbon emissions and local air quality and we are very keen to encourage innovations to reduce these. However, the AAP seems to favour one potential solution Underground Recycling System (URS), and has not considered the full range of options. At this time OCC does not feel that there is enough evidence to support the use of a URS system in Salt Cross.

38/01  
cont.

We support the emphasis the AAP gives to Green Infrastructure, following a landscape led approach, and the ambitious target of 25% biodiversity net gain. However, we note that the AAP boundary has been extended northwards into areas that are more sensitive in landscape and ecological terms. We are concerned that this might adversely affect the ecological and landscape interest in this area.

Detailed Officer comments can be found in Appendix 1.

Yours faithfully,



Susan Halliwell  
Director for Planning & Place

Direct line: [redacted]  
Email: [redacted]  
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## Appendix 1 – Detailed Officer Comments

### OCC Officer response to Salt Cross Garden Village Area Action Plan consultation

(Document Reference relates to AAP unless otherwise stated)

Team	Document Reference	Page	Comment/Suggested change in text
Transport Strategy	Figure 8.1 and Policy 13	129 130	<p>OCC is fully supportive of the Movement and Connectivity Strategy Key Principles (page 129) and the Key Design Principles (Policy 13) as set out in the AAP. The importance of ensuring separate consideration of sustainable links within the site; with existing Eynsham; and with the wider area as highlighted is welcomed as none of these can be considered in isolation.</p> <p>The need to discourage rat-running through Salt Cross whilst ensuring permeability of the site for all users including buses is key, as is the need for mitigation to minimise rat-running through Freeland and surrounding villages.</p>
	Policy 14 Active and Healthy Travel	134	<p>The requirement for a comprehensive network of inclusive walking and cycling routes, including both current (retained) routes and new routes is welcomed. Provision of safe and effective connections for pedestrians, cyclists and other non-motorised users across the A40, including a grade-separated crossing at Eynsham, will be essential to ensure that the A40 is not a barrier to sustainable travel.</p> <p>OCC and WODC commissioned a study as part of the AAP evidence base to advise on a potential solution to deliver a grade separated crossing of the A40. The study considered a number of factors in delivering such a crossing and concluded that the preferred option would be an underpass between Old Witney Road and Cuckoo Lane. This grade-separated crossing will be a key component of an active travel corridor along Cuckoo Lane, along which the primary and secondary schools will be located. OCC supports inclusion of the underpass within Policy 14.</p> <p>OCC supports the requirement at para. 8.20 to positively plan to encourage use of the underpass and reduce the numbers of pedestrians and cyclists crossing at-grade, thus minimising delay to traffic and providing a safer crossing option.</p>

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	Policy 14 Active and Healthy Travel Policy 15 Public Transport	134 and 139	The A40 Corridor improvements being delivered through Local Growth Funding and the Housing Infrastructure Fund are key to making the Garden Village acceptable in planning terms. Salt Cross and three other developments (West Eynsham SDA, East Witney SDA and North Witney SDA) are dependent upon delivery of this infrastructure and recovery of funding from these developments is an important criterion for securing that funding. From a State Aid perspective, recovery of monies from the Garden Village towards the A40 improvements is also essential. OCC is supportive of Policies 14 and 15 regarding HIF recovery.	38/27
	Policy 15 Public Transport	139	The location of Salt Cross and the future A40 Corridor improvements in the vicinity, mean that the Garden Village will be extremely well placed to benefit from improvements to both bus and rail infrastructure (including upgrades proposed for the North Cotswold Line) and high frequency bus services. OCC welcomes the emphasis on ensuring that there is excellent connectivity between Salt Cross and the Sustainable Transport Hub; bus stops along the A40; and the wider area. This is important to ensure that opportunities for ensuring sustainable travel are maximised.	38/27 cont.
	Policy 16 Reducing the need to Travel	144-145	<p>Technology advances provide considerable opportunities to reduce the need to travel and encourage sustainable travel. OCC welcome the focus on the role of technologies and on Travel Demand Management measures all of which will have an increasingly important role to play as the Garden Village progresses.</p> <p>Effective and robust monitoring will be key to ensuring that sustainable travel behaviours are embedded from first occupation; OCC supports use of smart technologies to facilitate this.</p>	38/28
	Policy 16 Reducing the need to Travel	145	<p><b>Car parking:</b> Policy 16 currently states that the absolute maximum car parking provision shall be 1 space per 60 m<sup>2</sup>. This policy should include further break down of uses and specifically we would suggest:</p> <p>Office - 1 per 50 sq m  R&amp;D – 1 per 70 sq m  B1(c) – 1 per 75 sq m  B2 – 1 per 80 sq m</p>	38/28 cont.

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			B8 – 1 per 250 sq m Other land uses would need to be considered on a case by case basis.	
	Policy 17	147	OCC supports the policy for the spine road to route through for the site in the early phases of development with potential for this to be bisected in future years.  The requirement to ensure that the development proposals are aligned and integrated with the A40 Corridor Improvements is strongly supported.  Phasing is not addressed in any level of detail within the AAP and this will need careful consideration as development starts to come forward, particularly in respect of implications for the A40 and wider network.	38/29
	Public Right of Way	AAP map	The AAP map should be updated to include Footpath 206/10.	38/51
Active & Healthy Travel	LUC Sustainability Appraisal Report	9	Improving cycle and pedestrian links to Hanborough Station will be important as the current road is unattractive and unsafe, as highlighted in para. 8.21 of the AAP. There is an ambition to provide an off-carriageway cycle route alongside Lower Road to connect with Hanborough Station, and the Salt Cross development will play an important role in bringing this forward. OCC considers that the development should provide the southernmost section of the route along the eastern edge of the Garden Village. To the north of the development it is anticipated that the development would make a financial contribution to the delivery of the full route by the County Council. There are some quite significant challenges in delivering the full route in terms of engineering and land ownership which will need to be addressed.  OCC welcomes the improvements that are proposed to Lower Road and PRow as identified in the Area Action Plan, Policy 14. However, the text: <i>'Segregated cycle and pedestrian provision via Lower Road to Hanborough Station shall be provided...'</i> could be refined to better reflect the likely delivery mechanisms.	38/25
Property (Schools)	Policy 2 (Energy efficiency)	46	Current school output specification requirements set benchmarks of 65 kwh/m2 for new primary schools and 75kwh/m2 for new secondary so an increase in S106 funding, for	38/04

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			the secondary school, will be required if it is to be 65 kwh/m2 for secondary schools as well.	
	8.18	133	<p>The 'school street' proposal requires clarity and needs to fully elucidate how the proposal will ensure that the general day to day running and management of the schools will not be undermined or made more difficult by, for instance, restricting visitors and deliveries to busy sites at certain times of the day along with, potentially, coaches picking up pupils.</p> <p>Although paragraph 8.24 enforces the need for through-linked loops, clarity on paragraph 8.18 is still required on how dead-ends will be avoided.</p>	38/24
	Policy 14	135	<p>Again, clarity is required around how 'school streets' will work and not create problems in the general day to day running and management of schools along with certainty that dead ends will not be created.</p> <p>Can the requirement for 1 cycle park per secondary school pupil be substantiated? Pupils are more likely to be arriving by coach from surrounding areas and walking or cycling if within the new development and Eynsham. Around 37% will be traveling between 2-5miles and 32% more than 5 miles. Where is the evidence that all these pupils will cycle?</p> <p>The requirement should be based on a realistic evaluation.</p>	38/26
Pupil Place Planning	Table 11.1 (Education)	188	<p><i>"Development at Salt Cross will increase the number of families and school age children within Eynsham Parish. To accommodate this, a 3.01 ha site will be provided which is large enough to cater for a 2-form entry or 3-form entry primary school. The size of the school will be <del>determined</del> <u>influenced</u> by decisions made in respect of the West Eynsham SDA."</i></p> <p>It is more accurate to say "influenced" than "determined".</p> <p><i>"This is likely to form a satellite facility to Bartholomew School which would then operate on a split-site basis, <u>subject to Regional Schools Commissioner approval</u>. There are a</i></p>	38/52

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			<p><i>number of options as to how this could be provided (e.g. separate sixth form, separate upper school, or separate lower school). The decision <u>on how to use the two sites</u> will be taken by the academy trust, based on educational grounds, alongside ensuring sufficiency of school places, and may evolve over time.”</i></p>
Waste Strategy	5.56 – 5.70 Towards Zero Waste – A Circular Economy	From 47	<p>Oxfordshire County Council (OCC) is the Waste Disposal Authority (WDA) for the county. We work with the Waste Collection Authorities (WCAs), the District and City councils, through the Oxfordshire Resources and Waste Partnership and have agreed an ambitious Joint Municipal Waste Management Strategy (JMWMS) to embrace the Circular Economy, reduce waste and increase recycling in the county.</p> <p>OCC is pleased to see references to the Circular Economy in the AAP, and especially the desire for the development to be supported by a Circular Economy Statement to reduce the impact of building materials, both now, and throughout their life.</p> <p>The AAP notes the impact that managing waste has on the environment, and to address this we would suggest that greater consideration is given to increasing the range of options further up the waste hierarchy. Free or very low-cost community space should be available to host repair cafes, swap shops and refill stations. A community fridge and larder can reduce food wastage and adequate space for a ‘library of things’ will ensure that residents of the garden village do not have to individually own all items, but instead can borrow ad hoc objects such as hedge trimmers and drills. Provision of public drinking fountains would also support residents to carry and re-use water bottles rather than purchase and then dispose of single use containers.</p> <p>For around 8 years Oxfordshire has been one of the best performing counties for recycling in England and we are keen to see our performance continue to improve. OCC has supported local groups through our Community Action Group Project to reduce waste and carbon since 2001. Over 70 grass roots community groups work on a wide range of environmental topics across the county, drawing on the skills and experience of local residents and others to improve their local environment, develop community connections and embrace the circular economy. WODC may wish to consider how they can create an environment that encourages the establishment of a CAG in Salt Cross.</p>

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			<p data-bbox="891 268 1272 296"><a href="https://cagoxfordshire.org.uk/">https://cagoxfordshire.org.uk/</a></p> <p data-bbox="891 336 2051 469">The AAP mentions the effect that innovative collection systems can have on the environmental impact of waste once generated. Underground Recycling Systems (URS) have been specifically mentioned and a research paper prepared to examine the potential for this system in Salt Cross.</p> <p data-bbox="891 509 2051 675">OCC notes the impact that waste collection can have on carbon emissions and local air quality and is keen to encourage innovations to reduce these. However, the AAP seems to favour one potential solution (URS), and has not considered the full range of options in development. This may limit the range of potential innovative solutions put forward by developers.</p> <p data-bbox="891 715 2051 778">At this time OCC do not feel that there is enough evidence to support the use of a URS system in Salt Cross.</p> <ul data-bbox="943 818 2051 1366" style="list-style-type: none"> <li data-bbox="943 818 2051 984">• The model as presented only considers the carbon impact of collection. Risks around waste segregation and contamination have not been appraised. These issues could have a large impact on the overall carbon impact of the solution, and even increase the environmental impact of the waste generated, they also carry large financial and performance risks.</li> <li data-bbox="943 992 2051 1091">• There is no appraisal of how organics (food and garden waste) will be collected in line with the new legislation put forward in the 2018 national Resources and Waste Strategy and subsequent consultations.</li> <li data-bbox="943 1099 2051 1163">• The environmental and financial cost of underutilised vehicles and equipment has not been considered.</li> <li data-bbox="943 1171 2051 1337">• The transport modelling is overly simplistic; it is predominantly based on predicted performance from another proposal; it is modelled under theoretical rather than real-life conditions; appears to overstate total collection miles attributed to both scenarios and makes no assessment of the collection of organics in the URS scenario.</li> <li data-bbox="943 1345 2051 1366">• A more detailed and balanced piece of work is required to produce a robust</li> </ul>

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			<p>comparison of transport impacts and costs attributed to the system.</p> <p>Before a final decision is made on the suitability of URS, or any other innovative collection system, OCC would like to see evidence of the ability of the proposed solution/technology to:</p> <ul style="list-style-type: none"> <li>• meet the legal obligations of both the Waste Collection and Waste Disposal Authorities</li> <li>• manage all of the household waste currently collected at the kerbside<sup>1</sup></li> <li>• help meet the targets in the JMWMS<sup>2</sup> <ul style="list-style-type: none"> <li>○ Reduction</li> <li>○ Reuse</li> <li>○ Recycling</li> <li>○ Diversion from landfill</li> <li>○ Restriction on the level of residual waste</li> </ul> </li> <li>• manage contamination/improve material quality</li> <li>• integrate with the current system in use in the district</li> <li>• allow councils to communicate easily with relevant residents</li> <li>• align with/adapt to the changes proposed in the national Resources and Waste Strategy<sup>3</sup></li> <li>• work in the housing mix proposed</li> <li>• assist in meeting carbon reduction targets</li> </ul>

<sup>1</sup> [www.cherwell.gov.uk/info/10/rubbish-and-recycling](http://www.cherwell.gov.uk/info/10/rubbish-and-recycling)  
[www.oxford.gov.uk/info/20004/recycling\\_and\\_waste](http://www.oxford.gov.uk/info/20004/recycling_and_waste)  
[www.southoxon.gov.uk/services-and-advice/recycling-rubbish-and-waste](http://www.southoxon.gov.uk/services-and-advice/recycling-rubbish-and-waste)  
[www.whitehorsedc.gov.uk/services-and-advice/recycling-rubbish-and-waste](http://www.whitehorsedc.gov.uk/services-and-advice/recycling-rubbish-and-waste)  
[www.westoxon.gov.uk/bins-and-recycling/](http://www.westoxon.gov.uk/bins-and-recycling/)

<sup>2</sup> <https://www.oxfordshire.gov.uk/sites/default/files/file/waste-and-recycling/OxfordshiresResourcesandWasteStrategy.pdf>

<sup>3</sup> <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

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			<p>We would request that developers provide details of:</p> <ul style="list-style-type: none"> <li>• Collection infrastructure (including installation costs and timescales)</li> <li>• Collection costs (capital)</li> <li>• Collection costs (revenue)</li> <li>• How the solution/technology will be kept clean – who will do this, how often, and what is the cost?</li> <li>• How the solution/technology will be maintained - who will do this, how often, and what is the cost?</li> <li>• Payback periods</li> <li>• Carbon impact of installation</li> <li>• Carbon impact of operation</li> </ul> <p>This information should be assessed by officers from both the WDA and WCA and early engagement from developers with both teams is encouraged. Establishing a working group involving staff from OCC, WODC and potentially other districts would be useful to assess the evidence available. A final decision on the suitability of any proposed system should be made by WDA/WCA waste officers in line with the ability of the system to deliver against targets in the JMWMS.</p>
Minerals and Waste Policy	Figure 11.6 – Illustrative Spatial Framework Plan	198	Pleased to see some Green Infrastructure as a buffer to the existing aggregates recycling site.
Archaeology	7.147 Archaeological Potential	124	<p>Overall, this is very good and contains strong provisions for the protection and enhancement of archaeological remains. The archaeological baseline has changed somewhat since LUC produced their outline document and so we have one comment on 7.147 to update the current situation slightly.</p> <p>A geophysical survey has been undertaken across the majority of the site and an archaeological field evaluation has been undertaken across parts of the site. This evaluation has recorded a range of archaeological deposits across the site from the Bronze Age, Iron Age and Roman periods.</p>

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			Not all areas were available for evaluation however and a further programme of investigation will need to be undertaken to fully identify the archaeological interest within the site.	
Housing	10.23	168	Welcome the commitment to 50% “affordable” housing but we need a further commitment to rental properties available at LHA rate or below.	38/43
	10.27	169	We would like to see a higher proportion of 1 bed flats, as our single clients leaving supported accommodation are experiencing long waits on housing registers.	38/44
	10.35	170	Would like removal of the phrase “subject to viability” and higher proportion than 15% ie 50% of 30%) to be social rent	38/45
	10.36	170	It is misleading to include Social and Affordable rented in the same category	38/46
	10.43	171	Suggest that key workers be a ring fenced group able to buy or rent	38/47
	Policy 24 Build to Rent	175	Support Build to Rent – would like key workers to be targeted	38/48
	10.90	180	We welcome the inclusion of specialist housing for older people. Our modelling suggests the need for a further 152 units of Extra Care Housing in West Oxfordshire by 2026, dropping to 109 by 2031 anticipating the development of a further 80 units in Witney (this assumes access from West Oxfordshire only).  Would like to see provision for younger people with physical disabilities and autism to live in supported environments both in shared premises and single units attached to shared premises. We estimate that approximately 4 young people per year may require supported accommodation with adaptations for autism per year in West Oxfordshire and 8 young people in the City. We also anticipate that approximately 9 young people per year across the City and West Oxfordshire will need properties adapted for wheelchair use.	38/49
	10.96	180	Happy to see the reference and link to Finding a Home in Oxfordshire. However please	38/50

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			note requests above for essential workers to be ring fenced into other low cost housing opportunities.
Public Health	Chapter 6. Healthy Place Shaping		We strongly support this bold and positively prepared plan which builds on learning from the NHS Healthy New Towns Programme and consistently integrates health and wellbeing priorities throughout the document. Evidence and best practice are drawn from both local and national sources to ensure that the vision, core objectives and policies align with headline public health policies and the NPPF to create environments that inherently promote health and wellbeing and help prevent avoidable ill health.
		51	<p>Whilst we fully support the core objectives and policies set out within the Healthy Place Shaping section, we recommend that some of the proposed indicators are reviewed.</p> <ul style="list-style-type: none"> <li>• 'Food miles' is perhaps more appropriate as a climate action measure</li> <li>• The multitude of variables and confounding factors make the demonstration of links between 'levels/rates of long-term limiting illnesses' and the quality of the built environment very difficult. An alternative approach could be to develop proxy measures that reflect core objectives to create social and inclusive environments (that reduce the risk of loneliness). These might include those that can be attributed to the provision of infrastructure, such as the numbers of people using co-working hubs, meanwhile spaces and leisure/recreation facilities but also groups and actions facilitated/set up through the community development officer.</li> <li>• As suggested within the 'Movement and Connectivity' section, the use of innovative technology could also be used to help measure 'levels/rates of healthy activity' e.g. Vivacity Labs sensors currently being used to in Oxfordshire to measure real time travel mode share in highway settings could also be deployed to measure the use of green space/outdoor gyms etc. whilst also providing data about how people spatially interact within and around such facilities.</li> </ul>
	6.68 'Network of multi-functional space'	75	Social prescribing is mentioned within the context of community food growing but not within the general use case for green infrastructure. Linking in with the 'new models of service delivery' element of healthy place shaping, social prescribing could also be highlighted within the 'network of multi-functional space' section e.g. to health walks and green gyms (which were first developed in West Oxon).

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Climate Action	Chapter 5. Climate Action		The County supports the approach by West Oxfordshire at which climate is core to the AAP, with the aim to deliver a net-zero development as defined by the London Energy Transformation Initiative (LETI) <u>Climate Emergency Design Guide</u> .	38/03
Environment Strategy (Ecology)	3.2 and Illustrative Framework Plan	20/21 and 198	The scheme boundary has been extended to the north, which was raised as a significant concern in respect of biodiversity and landscape during the previous consultation. The areas to the north have been identified as areas of high biodiversity value, with City Farm home to rare arable plants of European Importance and the brook providing high value ecological habitat. This area also supports a range of other floral and faunal species, which will be impacted by the presence of adjacent housing and active transport routes.  It is therefore unclear at this stage how this extension to the north is fully compatible with the objectives set out in the AAP and threatens the important biodiversity interests of this area and long-term viability of the local wildlife sites.	38/02
	6.59-6.63	73/74	The provision of a Country Park is welcomed; however, this will require detailed planning to ensure it meets a range of needs. Biodiversity interests will need to be protected to ensure recreation does not negatively impact its biodiversity enhancement function. Zoning will be required, for example to ensure areas of highest biodiversity value have little or no public access to prevent harm to their interest features, such as from dog walking and trampling. Conflicts between multiple uses will need to be addressed.	38/09
	7.6	85	It is understood that ecological surveys are ongoing, however it is unclear from the document what the results of detailed ecological surveys are to date, or how they have informed the layout proposed. The brook for example is a high value habitat, however the plan shows built development and active travel routes adjacent to it, which appears to be in conflict with biodiversity interests.	38/15
	7.25-7.36	89-92	The importance of the site for arable flora has been acknowledged, however significant losses will result, including species of national significance. The survival of remaining species, including those beyond the site boundary is therefore incredibly important as is ensuring the negative impacts of adjacent housing and recreation is prevented through	38/16

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			good design.	
	Policy 9 Biodiversity Net Gain	105	We welcome the ambitious target of achieving 25% net gain in biodiversity. I question however whether given the nature of this proposed development and habitats to be protected, enhanced and created, 30 years long-term management is sufficient and ambitious enough.	38/19
	Figure 11.6 Illustrative Spatial Framework Plan	198	The Illustrative Spatial Framework plan shows the brook as an 'active travel network' and built development is shown adjacent to the brook itself. Given the known ecological sensitivities of this brook, this is concerning from a biodiversity perspective. The negative impacts of the built environment and increased recreational pressure here appear to undermine the policies of the AAP in respect of environmental assets.	38/51
	Policy 28 Land Uses and Layout	204	The aspiration set out in the AAP is for 2,200 homes and 40ha of employment space by 2031. I query how challenging it will be to achieve this level of development, whilst still meeting all of the needs of other interests and policies provided, including biodiversity and protection of the environment.	38/53
Environment Strategy (Landscape)	WODC LP2031 Policy Map Update and, AAP paragraph 3.2 and Illustrative Framework Plan		<p>We note that the AAP boundary has been extended northwards into areas that are more sensitive in landscape and ecological terms. We raised concerns about this in the previous consultation, and we remain concerned that this might adversely affect the ecological and landscape interest in this area.</p> <p>Whilst we understand that the extension could assist in ensuring comprehensive management of all sensitive areas (ie the brook and adjacent ecologically important habitats) the inclusion within the garden village development site could also result in these areas coming under increased pressure from housing and/or recreational uses that are incompatible with the existing ecological interest.</p> <p>This concern seems to be confirmed by the Illustrative Spatial Framework Plan (p198), which indicates a 'active travel network' along the brook, and housing coming right up to the brook. This appears to be contrary to the recommendation of the Landscape and Visual Assessment (LUC, 2019), which judges the northern brook to be of higher</p>	38/51

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			<p>sensitivity, and which advises against development North of City Farm.</p> <p>Being mindful of the landscape sensitivities and ecological interest near the brook we are concerned that the proposed Spatial Framework could undermine the aspirations and objectives of the AAP with regard to protecting existing biodiversity and landscape character.</p> <p>Please see further comments about the Spatial Framework below.</p>	
	6.42 – 6.48	67	We very much welcome that the AAP seeks to adopt the Building with Nature benchmark and seeks to achieve 'Full Award – Excellent' accreditation.	38/07
		71	We welcome the emphasis the AAP gives to Green Infrastructure and a landscape-led approach.	38/08
	6.59-6.58	72	There is increasing evidence of the impacts of housing developments on natural habitats if these are in close proximity to each other. Care will have to be taken when planning the Green Infrastructure network and country park for the site to ensure that nature conservation areas are sufficiently separated from recreational open space uses and related disturbance.	
	6.59-6.62	73	<p>We welcome provision of a biodiverse Country Park and agree that it will need to be carefully planned and managed in the long-term. The Country Park is proposed to fulfil many functions, some of which could be in conflict with each other, e.g. the protection and management of valuable habitats and recreational uses. Careful zoning between different types of GI will be required to limit adverse effects on ecologically more sensitive areas.</p> <p>The term Country Park would benefit from defining e.g. as part of a comprehensive Green Infrastructure Strategy (as proposed in Policy 7) in order to avoid ambiguity about what is going to be provided, and to manage expectations.</p>	38/09
	6.69 and 6.89	75	We support that Green Infrastructure should be considered at all scales. We recommend	

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			that green roofs and sufficient space for mature tree planting forms an integral part of the built development. Green roofs could also offer benefits for biodiversity, recreation and opportunities for growing food.	38/11 38/13
	6.79	77	In the absence of up-to date local open space standards consideration could also be given to Natural England's Accessible Natural Green Space Standards (ANGSt) when assessing the most appropriate level of informal open space provision on site. This could be in addition to Fields in Trust Standards, latter of which focus more on formal sport and play provision.	38/12
		79	We support the requirement for a comprehensive Green Infrastructure Strategy at outline application stage. We also fully support that such a strategy would need to outline mechanisms of how Green Infrastructure including open space and nature reserves will be managed in the long-term.	38/14
	7.37	92	Nature Recovery Networks (NRN). We welcome that the AAP recognises the importance of ecological networks within the site and support the work that has been done so far. It would be good if such networks were also considered in the context to the wider Draft NRN for Oxfordshire ( <a href="https://www.wildoxfordshire.org.uk/biodiversity/draft-map-of-oxfordshires-nature-recovery-network/">https://www.wildoxfordshire.org.uk/biodiversity/draft-map-of-oxfordshires-nature-recovery-network/</a> ), which was recently developed by Thames Valley Environmental Record Centre (TVERC) in partnership with local nature conservation organisations. We recommend that a reference to this ongoing work is included in the AAP.	38/17
	7.46	95	We welcome and support the ambitious target of 25% biodiversity net gain.	38/18
	7.109	115	We welcome that the AAP recognises and stresses the need for sensitive lighting to minimise light spill and glare, and to minimise impacts on the dark skies. We would urge that this approach is not only adopted for the AAP site itself but also for connections outside the site boundary, e.g. the walking & cycling routes such as the one to Long Hanborough Station.	38/20
	11.67	210	We support the policy for provision of supporting infrastructure. Notwithstanding that the	

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			<p>Salt Cross garden village AAP is seeking to provide substantial open space within the site, we would like to highlight that a recent survey at Tar Lakes, a public amenity site in the Lower Windrush Valley, has shown that the majority of the estimated 75,000 visitors live within 10km of the project area, including people from the Eynsham and Cassington ward. With an anticipated population increase of 5,390 residents at the garden village site it is not unreasonable to expect more people to visit the Lower Windrush Valley despite on-site open space provision at the Salt Cross garden village site.</p> <p>We therefore would like to highlight that both the Wychwood Project and the Lower Windrush Valley Project (LWVP) are important providers for green infrastructure, biodiversity and recreation in the area, and ask for these projects to be included in any consideration for infrastructure investments.</p> <p>Both these projects are also identified as delivery partners for biodiversity and landscape enhancement in WODC LP Policy EH2.</p>
	Illustrative Spatial Framework Plan	198	<p>The Illustrative Spatial Framework Plan (p198) indicates the brook as 'active travel network' and housing coming right up to the brook. This appears to be contrary to the recommendation of the Landscape and Visual Assessment (LUC, 2019), which judges the northern brook to be of higher sensitivity, and which advises against development North of City Farm.</p> <p>Being mindful of the landscape sensitivities and ecological interest near the brook we are concerned that the proposed Spatial Framework could potentially undermine the aspirations and objectives of the AAP with regard to protecting existing biodiversity and landscape character. We would recommend that built development is moved back to enable a natural green buffer along the brook that allows the protection of sensitive habitats and the Local Wildlife Sites.</p>
	Policy 28		<p>Policy 28 assumes the provision of 2,200 homes plus 40ha of employment use and infrastructure by 2031. As mentioned previously we can see that it might be challenging to achieve this quantum of development whilst at the same time delivering on the aspirations for protecting and enhancing the natural environment and creating a high-</p>

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			quality leafy environment.  We recognise that the chosen wording “around 2,200 new homes” seeks to allow for some flexibility with regard to the quantum of housing to be delivered but suggest it should also emphasise that the quantum is subject to also satisfactorily addressing the other objectives and criteria in this document.	
	Eynsham Green Infrastructure Study 6.11	85	We would welcome the use of innovative and interesting solutions for safe crossings across the A40 such as green bridges as outlined in the report.	38/25
IHub	How will we measure success?	150	Range of jobs is also important, to ensure opportunities for a wide variety of potential occupants. Unless there is a particular demographic being targeted to live and work there.	38/30
	9.13	152	Note that it would be sensible to aim to include space for (micro) freight consolidation and redistribution when considering the precise mix.	38/31
	9.17	153	Ideally it should also be designed to be low embodied carbon.	38/32
	Policy 18	155	Supporting text to policy should reference Hanborough Station where the Transport Hub is mentioned.	38/33
	9.27	155	Suggest including micro freight consolidation (to get to zero carbon, this will almost certainly be needed for freight, given the challenges in decarbonising large vehicles).	38/34
	9.30	156	Typo – Covid-19	38/35
	9.33	157	‘Oxfordshire County Council’s innovation <del>team</del> <u>hub</u> .’	38/36
	9.34	158	Refer also to allocation of space for 5G units.  May want to explicitly mention special care homes and add something to the effect of ‘ <u>as well as use of smart technologies and sensors outside the home, such as in monitoring transport movements of all kinds</u> ’, to ensure it’s important beyond speciality housing.	38/37

Team	Document Reference	Page	Comment/Suggested change in text	
			It may be better to have an explicit section on smart tech and sensors.	
	9.35	158	Typo – provides	38/38
	9.36	158	It may be nice to include something here around social spaces also being used to promote circular economy e.g. repair cafes, community fridges etc.	38/39
	Policy 20	158	<i>'provision of Ultrafast Fibre to the Premises (Fttp) broadband <u>and 5G connectivity</u>'.</i>	38/40
	9.42	160	Remove apostrophe in two references to CEPs.	38/41
	9.44	160	It would be useful to provide context on how this compares to non CEPs.	38/42



**By Email**

Planning Policy  
West Oxfordshire District Council  
New Yatt Road  
Witney, OX28 1PB

23<sup>rd</sup> October 2020

To Whom It May Concern

**Salt Cross Garden Village – Area Action Plan Consultation**

I am delighted to confirm OxLEP's support for the proposals for the Salt Cross Garden Village, which West Oxfordshire District Council has set out under its Area Action Plan consultation exercise.

39/01

The proposals strongly align with our strategic economic priorities for Oxfordshire which have been detailed in the Oxfordshire Local Industrial Strategy and supporting Oxfordshire Investment Plan, and the Oxfordshire Energy Strategy which was launched last year.

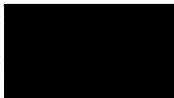
The AAP highlights the vital importance of a net zero development which harnesses the use renewable technology and responds positively to the climate emergency, creating a genuinely sustainable community in West Oxfordshire and an exemplar in health place shaping and active travel options.

We are equally pleased that the AAP highlights plans for a new 40ha science and technology park as part of the Salt Cross development. This a vital addition to the Oxfordshire Innovation Ecosystem which will provide much needed new innovation space to meet the continued high demand from technology and R&D based businesses from across Oxfordshire, whom are eager to remain and grow in the County, as well UK and international companies seeking to relocate into Oxfordshire and invest and create high quality jobs.

39/02

Salt Cross is an exciting proposition and we look forward to working with you as an active stakeholder in bringing forward your vision.

Best Wishes



**Ahmed Goga**  
**Director of Strategy, OxLEP Ltd.**





### Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:  
  
(For Official Use Only)

Name of the Document to which  
this representation relates:

Salt Cross Garden Village - Area Action Plan Consultation

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

**By Post:** Planning Policy,  
West Oxfordshire District Council,  
Elmfield,  
New Yatt Road,  
Witney,  
Oxon.  
OX28 1PB

**Or by Email:** [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)

This form has two parts-

**PART A – Personal Details**

**PART B – Your Representation(s).**

Please fill in a separate sheet for each representation you wish to make

### PART A

1. Personal Details

2. Agent's Details (If applicable)

Title	Mr	
First Name	Michael	
Last Name	Parker	
Job Title	Retired NHS Princip	
Organisation		
Address Line 1	██████████	
Line 2	██████████	
Line 3	██████	
Line 4	████████	
Post Code	██████	
Telephone Number	████████	
Email Address	██████████	



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

#### **PART B – Please use a separate sheet for each representation**

Name or Organisation:

3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input style="width: 100%; height: 40px;" type="text"/>	Policy	<input style="width: 100%; height: 40px;" type="text"/>
		Policies Map	<input style="width: 100%; height: 40px;" type="text" value="Fact Sheet"/>

4. Do you consider the Area Action Plan is:

- |  |     |                                     |    |                                     |
|--|-----|-------------------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant                       | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |
| 4. (2) Sound                                   | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the<br>Duty to co-operate | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

My concerns relate to the A4095 in Bladon.

At present lorries pass through the A4095 in Bladon from 04.00. and up to 20.00. and sometimes later, presenting a traffic, a noise and an air pollution problem to villagers which I consider is likely to be worsened when the Salt Cross Garden Village project is being built and afterwards due to additional deliveries and traffic volume using the A4095 which is a direct route to Bicester and Witney and a bypass route to Oxford when traffic is heavy.

Bladon already has a heavy traffic load and while the plan to improve the A40 may well help the quality of Bladon village life may be seriously adversely affected by additional traffic likely to be generated by the Salt Cross Garden Village project.

To be specific my area of concern is about the scheme increasing:

- \* Traffic volume on the A4095;
- \* Air pollution from additional traffic (although the pollution from existing traffic is an issue in its own right);
- \* Noise pollution from heavy works and other lorries passing through the village at what I would consider unsocial times of early morning and night (up to and later than 20.00. and from 04.00.).

40/01



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A traffic calming scheme through Bladon will help Bladon villagers.

A bypass road avoiding Bladon and other village centres to divert traffic away from centres of population in the villages would help reduce noise and air quality pollution and so enhance the Green credentials of the overall plan on people directly.

40/01  
cont.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Date

**RESPONSE TO WODC's 'SALT CROSS AREA ACTION PLAN:  
PRE-SUBMISSION DRAFT'**

From Nigel Pearce, [REDACTED], 27 September 2020

**Introduction**

WODC's Area Action Plan (AAP) has many policies, guidelines, commitments and aspirations that are very welcome. The enthusiasm evident in the document to build a high-quality innovative development is encouraging, even if it is partly driven by a guilty conscience (one hopes) at having chosen an inappropriate site without consulting the people of Eynsham parish first. Ever since then, it has been a question of damage limitation as much as creation of an 'exemplar' new settlement.

41/01

It is ironic that the government's recent *Planning White Paper* has seen fit, at the mere stroke of pen, to abolish the Duty to Cooperate, which led to the demand that Oxford's neighbouring District Councils should meet the City's 'unmet housing need' (since shown to be substantially exaggerated). This was the demand, along with landowner pressure, that became a justification for the 'garden village', and for the Strategic Development Area (SDA) in West Eynsham.

**Detailed comments**

Paragraph 1.1

Regarding the 'campus style' science park, what happened to Professor Westaby's imaginative proposal for a Centre for Rehabilitation, which would fit in well with affordable on-site housing for key workers? Is there some reason why this was not followed up? It would have been (and still could be?) an employment and medical/technological opportunity setting it genuinely apart from other science parks in and around Oxford, and putting West Oxfordshire on the map as a leading area in recovery and rehabilitation healthcare (even more so post-Covid).

41/02

Paragraph 3.3

You say: "There is some evidence of previous mineral working in parts of the site." This is a misleadingly vague sentence. You *know* for sure that there has been mineral working and landfill on the site, and make this clear in paragraphs 7.116ff. Are you rather coy about it here because you failed to mention it in your Expression of Interest? Landfill is just one of several damage limitation issues needing attention.

41/03

### Paragraph 3.13

Skylarks also nest in fields within the site, not just to the north of it. They don't know about their impending eviction; nor do the yellowhammers (both on the Red List). 41/04

### Paragraph 3.20, sixth bullet

Among the "key considerations that need to be robustly addressed to make the garden village a success" is the "Importance . . . of high quality agricultural land", which makes up 30% of the area of the site east of Cuckoo Lane. Since much or most of this is going to be permanently lost to development, and what's left won't be used for non-intensive agriculture, it's hard to see how you are going to address this issue robustly. It was ignored in the Expression of Interest and robustly misrepresented in Enfusion's lamentable 'Sustainability Appraisal Addendum Report: Non-Technical Summary'. 41/05

### Paragraph 4.2

The garden village needs to "ensure positive gains are also secured for nearby Eynsham, such as improved access to the countryside . . ." The garden village will push the countryside to the north further away from Eynsham residents, and they will have to cross more roads and built up areas to reach it (although the underpass, *if it happens*, will be a help). A number of informal footpaths and, it seems from your and Grosvenor's maps, a Public Right of Way will be lost to Eynsham residents, who will be further blocked off to the north during ten years or more of construction. The western extension of the village (SDA) will have a similar effect. You should stop repeating this misleading claim. Please delete it. 41/06

### Paragraph 6.6, fifth bullet

Air quality in the garden village is not going to be helped by having a stop-start spine road running through the middle of it, producing NOx and particulate emissions. The A40, Cuckoo Lane and Lower Road will also be busier and producing more air pollution than they do now. 41/07

### Paragraph 6.6, seventh and eighth bullets

You say: "Indices of deprivation for the Eynsham area are at a higher rate than West Oxfordshire as a whole." A cynic might ask whether the comparative deprivation of the Eynsham area was one reason why the problems for the Local Plan posed by the first Planning Inspector and Oxford's 'unmet housing need' were dumped, along with the Park & Ride and a possible new quarry, on residents who were less likely to have the influence and connections to mount a successful challenge. 41/08

The low economic inactivity and unemployment rates in West Oxfordshire (pre-Covid) referred to in the eighth bullet suggest that the aim of 3,200 new homes in Eynsham parish was largely to attract migrants into the area, mainly from London and the South East as well as Oxford itself, thereby keeping house prices high, when indices of deprivation demand affordable housing for existing locals. A 50% target for affordable housing is commendable, but will they be for local people only, and to what extent will “viability considerations” chip away at the target?

#### Policy 5

This policy mentions “worship” as part of “social community infrastructure”, and the word “worship” is mentioned four times, along with further consultation with faith groups. It would be a good idea to have a building/meeting place that is dedicated solely to worship and secular meditation, so that it maintains an aura of peace and tranquillity. It could be shared by different Christian denominations (Sunday and a weekday perhaps), Muslims (Friday), Jews (Saturday), Hindus, and secular meditation groups. It should not have to accommodate other meetings and activities.

41/09

#### Paragraph 6.52

The Green Infrastructure’s “corridors, connections and linkages” seem to have a large number of roads interrupting them. Can you reduce the number, since each one will impoverish the corridors, making them less nature- and human-friendly?

41/10

#### Paragraph 6.55

I agree that there is “considerable potential for new woodland creation . . . to help buffer the A40 and aggregate recycling plant site”. It’s ironic that you are only showing concern about the latter now, having failed to mention its existence in your Expression of Interest. Have you considered discussing with O’Malley how the field north of the site, which is part of their land, could be kept as a wildflower resource?

41/11

#### Paragraph 6.58

Main nature reserves around City Farm, its setting and the brook is a good idea.

41/12

#### Paragraphs 6.76 and 6.80

“. . . there should be as much advance planting as possible”. I agree. For example, a trick will be missed if you don’t succeed in planting out a band of trees and scrub linking Millennium/Eynsham Wood to Vincent’s Wood (see paragraph 7.60).

41/13  
41/14

If you do plant as much as possible in advance, you won't have to leave "the full extent of the green infrastructure network" to "subsequent reserved matters applications". Set the agenda for this now and create facts on the ground. You know that reserved matters will inevitably try to reduce the amount of GI, badly damaging its connectivity through irruptions by the built environment.

#### Page 84

One of the measures of success for biodiversity is "The number of off-site farmland birds". Yes, because there won't be any left on the site itself. 41/15

GV16: You seem to have forgotten the probable Roman site near the A40. 41/16

#### Paragraph 7.4

You say: "Within the site itself there are some pockets of high grade agricultural land." The notable proportion of Grade 2/3a land, most of it contiguous, represents far more than "some pockets". You continue to be less than honest about this. 41/17

#### Paragraph 7.5

"All the native hedgerows on site qualify as priority habitat." So why are Grosvenor planning to remove 15% of it, enough to stretch in a straight unbroken line from Millennium/Eynsham Wood to Church Hanborough? Much of the loss will be in the top two categories by value. How can this be justified, and how can it be avoided? 41/18

In a response dated 25 September 2020 to a petition about hedgerows, the government wrote:

"Legal protection for hedgerows is provided by the Hedgerows Regulations 1997. These regulations prohibit the removal of most or parts of countryside hedgerows without first seeking approval from the local authority, which is required to decide whether a hedgerow is important because of its wildlife, landscape, *historical (more than 30 years old) or archaeological value and as such should not be removed* [my italics]."

Are WODC and the developers going to abide by these Regulations or are they, like Brandon Lewis, going to break the law "in a very specific and limited way".

#### Paragraph 7.6

"The farm buildings also have potential for use by roosting bats and nesting birds." 41/19  
Another understatement; it is not just "potential". Open-sided barns at City Farm,

for example, are used each year by swallows, for which the surrounding fields are vital foraging areas. Bats fly into some of our houses quite often.

### Paragraph 7.27

Regarding the proposed Nature Recovery Network and how the garden village *will* (not “would”) affect its integrity and reduce the land available for it, one idea might be to have a green bridge over Lower Road, where the Saxon Way crosses it eastwards towards Eynsham Mill. As Natural England said in 2015, “bridges built across roads and railways to allow wildlife movement can stop species from becoming isolated and reduce the number of traffic accidents.” Certainly roadkill on Lower Road seems to have reduced the local deer population and its genetic pool since we have been here.

41/20

A green bridge over Lower Road for pedestrians, cyclists, horses and wildlife might make more sense than one over the A40 because it need not accommodate high-sided vehicles and double-decker buses. There is already a height limit because of the railway bridge at the northern end. It would be costly, of course, but if all the encouraging words on biodiversity in the AAP are to be believed, this is the kind of compensatory measure that needs to be incorporated into the garden village. It would immediately further open green access to the east for local residents.

### Paragraphs 7.31ff

The arable wildflower mitigation and compensation strategy looks promising. What a shame you did not bother to find out about this rare resource when you submitted your Expression of Interest. Perhaps the site wouldn’t have been chosen . . .

41/21

### Figure 7.3

The Public Right of Way from the A40 past New Wintles Farm has been obliterated in this and other maps. Is that legal? Have the County Council agreed?

41/22

### Paragraphs 7.7, 7.134, 7.145, 7.147 (and GV 16)

Tilgarsley is mentioned 15 times in the AAP, but in the above paragraphs (and policy) it is referred to as a “suspected” site, “suggested” or “possible”. This is yet another instance of understatement. There is now no doubt that the site *is* Tilgarsley and has been positively identified as such by the County archaeologist Hugh Coddington. Nor is there any doubt that it was depopulated by the Black Death in the 14th century as historian of the period Philip Zeigler pointed out many years ago (*The Black Death*, p.117). As he remarked, unlike most ‘Deserted Medieval Villages’ (DMVs) which experienced gradual decline over many years, sometimes centuries,

41/23  
41/24  
41/25  
41/26  
41/27

Tilgarsley is almost unique in the country in being completely deserted almost overnight, as the *Eynsham Cartulary* makes clear, and left virtually untouched ever since. As such, it provides a very rare time capsule of life in the early 14th century and it and its setting need to be carefully protected and examined.

#### Paragraph 7.41

Great crested newts were found in two ponds at City Farm, not one. 41/28

#### Paragraph 7.53

“Specialist wardens and/or rangers must be incorporated” into the Biodiversity Net Gain Strategy. Yes, a very good idea. Who will pay for them? Or will you rely on, and train, volunteers? 41/29

#### Paragraph 7.58

An interesting oblique admission that the garden village will be a “suburban environment”, thus contravening garden village principles. This paragraph hints at rowing back from commitments being expressed elsewhere in the AAP. 41/30

#### Paragraph 7.64

Buildings inspired by nature: “hospitals are now being designed where patients recover faster.” Another argument in favour of Professor Westaby’s Centre for Rehabilitation. 41/31

#### Paragraph 7.65

This is an excellent list of biodiversity measures, but they should be “compulsory”, not “considered”. 41/32

#### Figure 7.6

Area B as an offsetting site would presumably become unviable in the event of the County Council choosing to develop a new quarry (SG20b) in the middle of it. 41/33

#### Paragraph 7.89 and Figure 7.7

You say: “The garden village will need to be sequentially designed to avoid areas of high flood risk from all potential sources of flooding.” Figure 7.7 (aka Figure 11.3) shows quite clearly how risky it is to place residential development in substantial sections of the low-lying east of the site; and yet this what both Grosvenor and 41/34  
41/35

WODC are proposing. Even if the housing is accompanied by SuDS, it indicates a departure from sequential design.

The flood risk in the east of the site has been consistently downplayed from the very start, an example of what Kate Raworth in *Doughnut Economics* has described as “risk bias – underestimating the likelihood of extreme events, while overestimating our ability to cope with them”. This bias is equally evident in the approach to drought conditions in an area that WODC acknowledges to be subject to “serious water stress” with a “high and growing demand for water” (paragraph 7.80).

#### Paragraphs 7.119ff

The disconnect between what is written here about soil and best and most versatile agricultural land on the one hand, and the reality in Grosvenor’s and WODC’s maps on the other, is stark and reveals an inadequate response to another damage limitation issue.

41/36

#### Paragraph 7.144

You say: “As the agricultural and rural settings of Eynsham Hall and Church Hanborough Conservation Area contribute to their heritage significance, any future potential expansion of the garden village would need to be carefully considered.”

41/37

**This unassuming little paragraph is the most disturbing sentence in the AAP.**

Is there some hidden agenda of substantial expansion being hinted at here? Was this what lay behind the map on page 8 of the Expression of Interest, which showed an area of 320 hectares, rather than 215? Is there a secretive long-term plan for Pye Homes’ five garden villages between the A40 and A4095, for example? Why else would the agricultural and rural settings of Eynsham Hall and Church Hanborough Conservation Area need to be considered? Is this a nod to the Planning White Paper, to allow all the land between Eynsham, Freeland, Barnard Gate and Long Hanborough to be a *Growth* area with automatic planning permission for new estates and other types of built environment? Is it just a careless piece of writing, or are you under pressure from developers, landowners, and central government to make all this land available for development?

Expanding north or west would wreck the Nature Recovery Network; ruin all the garden village’s carefully planned wildlife and habitat mitigation, enhancement and connectivity; destroy more valuable farmland; overload local roads and facilities, not least sewerage; increase air, noise and light pollution, flood risk and water stress; risk intensifying global warming; create decades of construction misery for local residents; and make a mockery of the whole ‘garden village’ project by creating a monster of suburban sprawl.

If this “potential expansion” is already in the pipeline, then all the fine words in the AAP about greater countryside access, biodiversity net gain, careful soil management, etc., are a waste of space, time and effort, and no more than meaningless platitudes to pacify the natives in the short term.

**So what exactly are you saying in paragraph 7.144? Spell it out.**

#### Paragraph 8.2

You say that the containment of trips within the garden village “will in turn minimise the number of vehicles using the external road network, including the A40”. Hardly. The most it can hope to do is reduce the number of inevitable *additional* vehicle trips outside the garden village. Please be realistic in your claims.

41/38

#### Paragraph 8.4

Future proposals to discourage car use along the A40 could be effective, but they take little account of commercial traffic – lorries and vans – or where it’s going. In my once weekly journey on the A40 from Eynsham roundabout to and from the second Witney turn-off at the same time of day on a Thursday – a journey that lasts about 8–10 minutes – I have been counting the number of commercial vehicles going the other way. In the past few months the number has risen from around 40 to 70–80, or roughly one every 6–8 seconds. The increasing switch from traditional retail shopping to online purchases will accentuate this trend, as will the large number of new homes and businesses along the A40 corridor.

41/39

At the same time, road ‘improvements’ such as dualling have always resulted in an increase rather than decrease in traffic. One of the measures of success on page 127 is “traffic speeds”. If this is for cars and commercial vehicles – as well as for buses – it is a questionable measure of success, because it will encourage greater car, van and lorry traffic, resulting before long in similar or worse levels of congestion and pollution.

#### Figure 8.1

So long as there is an uninterrupted spine road through the garden village, no matter how discouragingly designed, it will always be attractive as a rat run when congestion in the bottleneck between Eynsham and Salt Cross brings traffic to a standstill, as it increasingly will. As for minimising rat running along Cuckoo Lane, that is an equally lost cause.

41/40

Paragraph 8.12, fourth bullet

“The need for new road connections to cross existing Rights of Way must be minimised.” Yes indeed, but easier said than done. And one Right of Way in the east of the site is going to be completely lost, it seems.

41/41

Paragraph 8.20

The three new signalised crossings “within the vicinity of the Garden Village” are not going to help the Eynsham bottleneck; and “uncontrolled” crossings at Cassington are surely inadequate.

41/42

Paragraph 8.24

Since “schools shall be on a through-linked loop to prevent the need for vehicles to turn round”, you seem to be still expecting a significant amount of vehicle travel to the schools. Driving there from southern Eynsham or further south (Sutton and Stanton Harcourt?) looks like a tortuous and frustrating journey, particularly along the short stretch of the A40. No matter, the residential spine road through the SDA will be available. Another rat run.

41/43

Page 135

Still going for a “spine road”, it seems, which will inevitably sever and divide the garden village – to such an extent that “adequate crossing points for pedestrians and cyclists must be provided”. As I said when I wrote to you in July, “it is clear that the garden village is being constructed either side of a major thoroughfare from the A40 to Lower Road, which will cut through the Salt Way, Saxon Way, and another PRow, severely undermining the focus, rationale and attractiveness of ‘Salt Cross’.”

41/44

Page 137

“The speed limit along the A40 in the vicinity of Eynsham will be reduced from the National Speed Limit to a maximum of 50 mph.” This is inadequate. It should be reduced for this stretch of road to at least 40 mph and preferably 30 mph. Three roundabouts, three signalised crossings, other junctions (still open?) at Witney Road, Cuckoo Lane and the garage, bus stops and two bus lanes: 50 mph is madness.

Page 139

“Land will be safeguarded along the southern boundary of the Garden Village to support widening of the A40 to accommodate bus lanes [now in both directions] and

41/45

shared foot/cycle paths.” What will happen to the garage and Tesco? How much buffering and new planting will be necessary, and is this being properly catered for?

Paragraph 8.60

Do you truly believe that the spine road will ever be bisected? If so, why not bisect it from the start, except for access to buses, cyclists, pedestrians, and mobility and emergency vehicles? (According to Stagecoach, the S1, S2 and S7 will *not* be going through the garden village, and a bus service to Hanborough Station makes more commercial sense via Cuckoo Lane, Freeland and Long Hanborough than via Lower Road. So bus access, too, may not be necessary.)

41/46

Page 147

If you are going to have vehicular access to the schools from a new A40 roundabout via Cuckoo Lane (and skirting the technology hub and science park), how will a “change in priority” in Cuckoo Lane deter through traffic from using this road through Freeland village, particularly if that is the route that people from Freeland and beyond will use to get to the Park & Ride via the new Western Development Roundabout? I may not be able to understand what’s going on here, but it seems to be not entirely thought through.

41/47

Page 148

“Planning for development will only be granted where the Council is satisfied that the impact on the local and strategic road network and density of the development would be acceptable and does not compromise the delivery and benefits of the A40 corridor improvements.” The trouble with this sentence is that the full impact will only be known when the development is finished, when it will be too late to do much if anything about it. And who decides on acceptability: the Councils or the local residents who will suffer the consequences?

Are the two bus lanes now going to be built at the same time?

Paragraphs 10.23ff

When it comes to housing provision, it is depressing how often “viability considerations” are mentioned.

41/48

Page 181 (photograph)

Biodiversity provision is spread a bit thin in Marmalade Lane.

41/49

## Figure 11.6

What exactly is the status of this map, and indeed other maps in the AAP? Is the layout in 11.6 going to prevail over Grosvenor's submitted masterplan? Has all Grosvenor's work been a waste of time?

41/50

Figure 11.6 is less puzzling than its previous incarnation, but still leaves questions unanswered that probably should be answered at this stage. For example:

- What is happening to David Carrington's greenfield land?
- Why is O'Malley's field north of the aggregate recycling facility included?
- Why are you insisting on having houses between that industrial facility and a high risk flood area?
- Why have you got the spine road crossing over a small lake?
- Why has a Public Right of Way been removed between Eynsham and City Farm via New Wintles Farm?
- Why does the Salt Way have a big gap in it where the primary school is?
- Are *all* the homes going to be genuinely affordable, as suggested by the colour on the map, and will they all have gardens?
- How many of the many green "active travel" routes within the site will be closed to cars and other vehicles?

## Paragraph 11.37

Regarding the Lowland Hub: I am no hydrologist, but I am not sure that the "natural wetlands" will work in drought conditions in a warming climate. They could be dry for long periods, and then fill up quickly (and overflow?) in extreme rain events.

41/51

## Page 204

Any re-location of primary health care facilities from Eynsham to the garden village will be extremely inconvenient for Eynsham residents and will encourage car use.

41/52

## Section 12: Delivery and Monitoring Framework

As a general point, the measures of success are not always sufficiently quantified (some policies do this better than others). I don't mean targets; just more of an idea of different levels of success (or failure).

41/53

## *Page 219 – Climate Action*

The Defra/Natural England Eco-metric might sit better in the Biodiversity section? Either way, it would be useful to repeat the 25% biodiversity net gain as the measure of success.

*Page 223 – Green Infrastructure*

How much, and how many different types of, green space would be an acceptable level of success? And how many “mini” nature reserves: two or ten, for example? Would two be disappointing (a failure) and ten more than originally hoped for?

*Page 225 – Biodiversity Net Gain*

It might be helpful to add both the Environment Bill’s 10% and WODC’s excellent 25% net gain measure here.

How much new habitat constitutes a mild, broadly hoped for, or exceeded measure of success? Likewise, how many off-site farmland birds, and will this number be measured against the number of farmland birds driven out of the site itself?

*Page 226 – Water Environment*

Presumably any incidences of flooding onsite or adjoining the site will be logged as a comparative failure, depending on the extent of the flooding and damage caused?

*Page 229 – Movement and Connectivity*

“Traffic speeds” is a problematic measure of success. Do you mean the time it takes to get into Oxford by bus, for example? If cars, vans and lorries are going faster, they will be using up more energy. If vehicle speeds increase initially, will that quickly lead to more congestion?

*Page 234 – Housing Delivery*

Presumably, as you have set a target, anything less than 50% affordable homes will be regarded as a comparative failure? And what do you mean by “genuinely” affordable? Would a measure of success be 20%, 30% or 50% of market rates?

*Page 239 – Land Uses and Layout*

Completion and operation of the Park & Ride can hardly be a measure of success in itself. It may have a negligible or no effect on congestion and journey times on the A40 for cars, vans and lorries. Buses will presumably do a bit better, but that’s because of the bus lanes.

PS. A suggestion

The proposed site for the garden village is a very windy part of the world. Why not include a traditional vernacular windmill as a landmark for the village (there is one in North Leigh)? Since it would generate some noise, a good place for it would be on Lower Road, next to Grosvenor’s cricket pavilion in the field north of O’Malley’s access road. This is an unsuitable area for houses, but a windmill could be raised above flood risk level and could partly power the pavilion or O’Malley’s operation.

41/54

Respondent ID 42 - Grosvenor  
Comment ref: 42/01 - 42/123

23<sup>rd</sup> October 2020

Planning Policy Team  
West Oxfordshire District Council  
Elmfield  
New Yatt Road  
Witney  
OX28 1PB

**Salt Cross Garden Village Area Action Plan – Pre-submission Draft (Reg 19),  
representation on behalf of Grosvenor.**

1. Prior + Partners write on behalf of Grosvenor Developments Ltd (Grosvenor) with regard to the Salt Cross Garden Village Area Action Plan (AAP) – Pre-submission (Reg 19) Draft currently under consultation. Grosvenor has been previously represented in this regard by AECOM, although the technical team (including the planning lead) who have supported this representation (including Stantec, Terence O'Rourke and Savills) has remained consistent.
2. Grosvenor represents a consortium of landowners that controls the majority of the Oxfordshire Cotswolds Garden Village 'Strategic Location for Growth' (SLG) and submitted an Outline Planning Application (OPA) for the Salt Cross Garden Village in July 2020, previously named Oxfordshire Garden Village. This is available on the WODC Planning Portal under reference 20/01734/OUT. Since its involvement began in 2016, Grosvenor has worked collaboratively on the OPA with West Oxfordshire District Council (WODC), Oxfordshire County Council (OCC) and other stakeholders, including the local community, to ensure that the OPA for the Salt Cross Garden Village is consented and delivered consistently with the Local Plan aims and objectives in order to meet local need.
3. In its current form, Grosvenor identifies that in its view the pre-submission draft is **not** sound, positively prepared, justified, effective, or ultimately supported by a sufficient evidence base to form part of the Development Plan.
4. The AAP as presented has a fundamental flaw in that it is not backed up with evidence to identify that the Garden Village and AAP objectives are viable and deliverable at this stage. The AAP unjustifiably increases obligations with regard to a number of issues across the board to such a degree that it renders the Garden Village undeliverable and undermines delivery of homes and substantial other public benefits. Grosvenor has

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consistently raised these points in past representations and pre-application discussions with a number of officers and these concerns have not been taken on board.

5. We therefore formally request that Grosvenor's recommendations (outlined below) are taken into account in the submission to the Secretary of State and hereby formally request that Grosvenor is invited to participate in all examination hearing sessions.
6. In the main body of this representation we have set out Grosvenor's overarching objections to the AAP. In the appendix we outline a series of objections (to the AAP's current form) and amendments suggested to make the plan more likely of being found sound. These amendments can help the identified issues to be satisfactorily addressed in a straightforward manner.
7. The OPA and draft AAP have a significant number of shared ambitions although in some respects these have been refined in the OPA to meet the aspirations for Salt Cross but in a way that is thoroughly evidenced, balanced and deliverable. As you are aware, Grosvenor has provided sufficient evidence and site understanding as part of the OPA to justify its positive determination and is being unduly held by delays in the production, examination and adoption of the AAP. There has been strong interest from both commercial and residential development partners and occupiers. Grosvenor believes that the best way to accommodate these parties and minimise timescale risk is to continue to work within the OPA framework in order to move quickly (in 2021) to the delivery phase.
8. The direction of travel of the Planning White Paper is clear on this aspect and the desire to ensure that the production of subsequent additional policy should not delay the delivery of housing already allocated to meet West Oxfordshire and Oxford's unmet need following the Local Plan being found sound in 2018. The estimated delivery of identified need to be met by the Garden Village is currently proposed (by the AAP) to be met beyond the Local Plan period. WODC is in receipt of an application which meets objective of Local Plan, is deliverable, addresses wider issues from enabling infrastructure and could accommodate potential occupiers on site. The AAP as drafted risks delay to delivery on site.
9. The AAP, through the level of prescription, will have a role in informing elements of the detailed design of Reserved Matters Applications, although it is not required to be adopted ahead of the determination of the OPA given the established principle of development of this type in this location. Through additional supporting work and by revising the draft AAP to add suitable flexibility to the drafted policies, West Oxfordshire could allow for effective application of the policies which would allow alternative solutions to be brought forward over the plan period (to 2031) whilst recognising a preferred strategy at this point of time that is thoroughly evidenced, deliverable and viable.

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cont.

## Overall viability

10. Paragraph 1.6 outlines the evidence base which has informed the draft AAP, with the notable absence of any reference to viability work. As the draft AAP goes beyond the standards established in the Local Plan in nearly every respect (affordable housing, energy requirements, biodiversity, transport strategy, including impact on commerciality of reduce car parking and extensive financial contributions to wider mitigation) it is not appropriately covered by the Local Plan viability work. There are little or no costs in the draft AAP or supporting evidence base. 42/02
11. The Reg 19 AAP is therefore **not justified** and **not effective** as it is **not based on proportionate evidence** and is **not proven to be deliverable**.
12. Through the production of the OPA proposals Grosvenor has been clear to officers that all of the items listed in the draft AAP are unable to be provided by the development alone, yet little alternative funding arrangements have been identified or suitable alternatives considered.
13. As we have stated in our representations previously and in response to the CIL Draft Charging Schedule, the significant infrastructure required to deliver the Garden Village is such that it is critical that this infrastructure is accounted for so it can be included with the Garden Village proposals. The work to support a draft CIL charging schedule, recently out for consultation, includes assumptions for typical section 106 agreements based on the Council's evidence base provided and concludes that **"the Strategic Site test results all indicate marginal negative viability due to the significant site opening up costs and the site specific S106 infrastructure contribution requirements"**. The CIL evidence base, prepared by the Council's consultants using Local Plan policies (i.e. not those in the draft AAP which significantly extend requirements and standards) identify that the project has a negative marginal viability of over £19,000,000.
14. Despite numerous requests, since January 2020, Grosvenor has not been provided with a draft Section 106 list and little progress made on a site-specific solution that balances priorities. The OPA's Infrastructure Delivery Plan (IDP, written in response to the Eynsham IDP which supports the AAP) outlines the project commitments, which reflect those made in our engagement activities. Paragraph 11.75 of the draft AAP states that "having regard to the Eynsham Area IDP and any site-specific IDP prepared in support of an outline planning application, the Council will work in partnership with the site promoter, Oxfordshire County Council and the local community through Eynsham Parish Council to discuss and agree an appropriate and viable infrastructure package for Salt Cross". The final list of sought infrastructure and associated costs will be critical as there are a **significant amount of unclear positions** within the draft AAP regarding financial contributions or the cost of infrastructure sought. In the absence of viability work no priorities have been identified and there are disparate items outlined as 'to be considered'. As an example, a £4.2 million Underground refuse system is identified in the AAP evidence base which is then referenced in the draft policy. It is not clear if this a requirement of the development or that this additional cost has been considered in the AAP viability work. 42/02 cont.

15. As part of the support to WODC and as an input to CIL work, Grosvenor has provided interim cost estimates on required infrastructure and repeatedly highlighted the already challenging scale of infrastructure to meet the AAP aspirations. Therefore, Grosvenor thinks that the additional costs that are not justified will further exacerbate the current viability position.

## **AAP Boundary**

16. The AAP includes a confirmed boundary in Figure 3.2 and amendment to West Oxfordshire Local Plan policies map. The OPA red line is entirely within this boundary, with Appendix 2 including the red and blue line for this application.

42/03

17. At previous stages of plan making and as an applicant (as part of the Local Plan and Sustainability Assessment process, the EIA scoping and the consultation events) Grosvenor has been clear that it does not control all of the land within the proposed AAP boundary and has brought forward OPA proposals on land solely within its control. The OPA is clear that it can **meet the quantum of residential development and a clear majority of the employment area** outlined in the Local Plan. The OPA has been designed to not prejudice further development on the remainder of this allocation, whether in Grosvenor's control or outside, if this is brought forward in the future.

18. In relation to land within Grosvenor's control but outside the OPA, Grosvenor is concerned with the specific provision in the Illustrative Spatial Framework (and Policy 28) relating to the need and location of a "continuous"... "Country Park" on the northern fringe, being not evidenced as deliverable and viable as covered below and addressed in Appendix 1.

## **Housing delivery, mix and apportionment**

19. Ongoing work from Grosvenor's consultant Savills has helped inform discussions regarding market housing and affordable housing on site as part of the overall viability work supporting the OPA but also in response to the Affordable Housing SPD, recently out for consultation to which the Grosvenor position has been outlined. As a result, Grosvenor **support** the clarification in Policy 23 that "This is an indicative guide only and in determining proposals, the Council will take into account other relevant factors ... and market evidence of demand at the time of application".

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20. Building on the pre-and post-submission working with WODC's officer team, the Section 106 agreement for the OPA will outline the affordable housing contributions as part of the development. These discussions are referenced in the WODC affordable housing team's initial response to the submitted outline planning application, which also outlines the need to include consideration of the wider viability work to help "agree the affordable housing percentage, tenure mix and dwelling mix".

21. The indicative size mix for affordable housing appears to reflect the SHMA which was dated 2014 and may not consider current demand due to changes in welfare reforms.

Furthermore, the dwelling size mix is not reflective of the waiting list which provides more up to date evidence, or further consideration of 'First Homes' as recently consulted upon by the Government. The choice-based lettings evidence clearly shows that 85% of affordable housing should be 1 & 2 bed, not 65% as per the proposed split. This is further confirmed in the last 3 years waiting lists which all show the same data (over 85% needing 1 & 2 bed homes). As a result, the appropriate flexibility in this policy is essential to ensuring that the most appropriate solutions remain available in the determination of any planning application within the AAP boundary.

22. Given the relationship between the Salt Cross Garden Village and its identification to meet Oxford City's unmet need during the preparation of the West Oxfordshire Local Plan, it would be appropriate for the Memorandum of Understanding (referenced in Paragraph 10.45) to be signed between the two authorities **ahead of submission** to ensure that the AAP is positively prepared. 42/105

### **Biodiversity Net Gain**

23. The 25% Biodiversity Net Gain (BNG) target is not justified by the evidence contained within or prepared to support the AAP. The AAP makes reference in paragraph 7.47 to supporting evidence prepared for Natural England which suggests that a 20% BNG "is not expected to affect the financial viability of housing developments" and then further adds an additional 5% gain based on the ambition for a landscape-led Garden Village development. While the AAP includes a focus for on-site mitigation, the increase in targeted BNG inevitably results in a reliance on offsite mitigation proposals given the high baseline of the site. This is contrary to the principal objectives of the policy and could result in additional contributions, potentially unrelated to the Garden Village. 42/35
24. The AAP hypothetical example within paragraph 7.74 identifies that the uplift from (emerging) national policy of 10% to 25% BNG would add a cost of £1.7m, over and above the already significant cost required to provide gain on site.
25. The Salt Cross Garden Village Site has a high baseline of biodiversity units and this should be an important consideration in the assessment of BNG outcomes realistically achievable and referred to in the AAP. A more nuanced qualitative and quantitative assessment, based on site-specific characteristics, should be adopted when assessing proposals as an alternative to the unjustified 25% biodiversity target.
26. In light of the quantum of development identified within Local Plan and reiterated in the AAP, to be effective and justified the BNG outcomes should be looked at with regard to the tailored evidence prepared for the site which already achieved a biodiversity net gain through the OPA proposals (in line with current national policy).
27. The 25% required is far in excess of the 10% BNG as the emerging national target and does not consider the site characteristics, with the evidence base being based on high level preliminary ecological appraisal only (compared with the site specific surveys completed by Grosvenor and shared with WODC), and the level of baseline biodiversity units. The costs associated with this uplift (either as biodiversity credits, on-site

enhancement or off-site mitigation) and deliverability (full costs, land availability and third-party landowner co-operation) associated with the uplifted AAP target are not established at this time. Suggested amendments to allow for a site-specific response are included in Appendix 1.

## Green Infrastructure

28. The OPA provides for approximately 60 hectares of public open space and green and blue infrastructure as outlined on the Landscape Parameter Plan. However, Grosvenor is concerned with some elements of the Green Infrastructure (GI) policies within the AAP.
29. The need for a Country Park is **not demonstrated at the Garden Village or sub-area**.
30. The AAP outlines in paragraph 6.79 that up to date assessments of need are ongoing and have not informed the quantitative requirements outlined in Table 6.1 of the AAP (of a total 39.89 ha).
31. Furthermore, there are inconsistencies between the GI totals in Table 6.1 and other requirements in the same sentence in Policy 7 when applied to Salt Cross.
32. When the Eynsham IDP attempted to identify minimum quantitative standards ahead of ongoing work to identify site specific requirements, the approach to increase the standards above the Fields in Trust standards appears arbitrary and the required 31% increase is compared to a small selection of case studies, of which only two schemes (not standards) are from neighbouring authorities, and appears based on Welwyn Garden City only. Furthermore, the exercise was identified to represent "generous provision for exemplar new development", with the minimum requirements in excess of this included in the AAP not evidenced as fairly and reasonable related to the development. There is no evidence of how the three reasons identified in paragraph 5.4.39 of the Eynsham IDP to "exercise caution in applying the figures" are addressed and the uplift from the evidence base completed to support the Local Plan and the allocation of the Garden Village is not explained.
33. It is useful in paragraph 6.80 for the draft AAP to recognise that "the full extent of the green infrastructure network will only be confirmed through subsequent reserved matters applications". At this stage of plan making it is also not clear why Table 11.1 of the AAP excludes some open space uses which form part of the overall multifunctional GI network, notably incidental open space. The AAP should identify and take into account the management and maintenance costs associated with the additional Green Infrastructure, notably the specifically referenced Country Park (subject to the paragraph above regarding lack of evidence to support this requirement) over a 30-year period to consider as part of viability.
34. Rather than the series of different green infrastructure strategies referenced in the AAP (outlined in detail in Appendix 1) it is suggested that management arrangements should

be enforced through a conditioned Landscape and Ecological Management Plan (LEMP) as suggested by the OPA to maintain the net gain currently achieved on site.

### Climate change, carbon reduction and fabric energy efficiency

35. There are many cross dependencies in national regulation when considering the transition to net zero carbon. In particular, how the energy sector is regulated and the role of OFGEM in the UK transition to net zero carbon for power generation, supply, infrastructure and retail. It is noted that the AAP evidence base did not review these wider national policy and regulatory frameworks relating to the energy sector, buildings, climate change and issues considering net zero carbon. 42/04
36. The ability for an AAP to set visions and policy which rely on action beyond the control of the local authority or site developer, without making consideration on how this can be achieved within the wider regulatory framework, needs careful consideration. For example, the ability to be energy positive by generating energy 'close to site' is reliant on the regulated power sector being able to accommodate such provision. It should also be noted that the Buildings Act would not recognise the benefits of such an approach within the energy performance of new homes and therefore this could not form part of the Part L compliance assessment (nor be recognised within Energy Performance Certificates for homes). Such cross regulatory issues **have not been addressed** within the Energy Plan for the AAP. As such the vision would currently be compromised by factors beyond the control of both WODC and the developer.
37. Within the evidence base there is no consistency on the definition of net zero carbon and no clear evidence established to show viable delivery of the LETI definition within the UK or West Oxfordshire.
38. The London Energy Transition Initiative (LETI) referenced in Paragraph 5.33 of the draft AAP is a London based independent industry working group. It does not represent industry wide consensus on the definition of net zero carbon, as it predominantly focuses on building energy only, is London centric and does not take into consideration the largest direct emission from the impact of new development, transport, or indeed other direct greenhouse gas emissions related to land use change. Whilst the Elementa Report uses the LETI definition of zero carbon, both the Bioregional Report, November 2019 and Oxford County Council Report, May 2020 use the more flexible Green Building Council (GBC) definition of net zero carbon. They also both reference 'other' net zero standards adopted by Councils such as Reading Borough Council, which are again different to the LETI and GBC definitions. The evidence base presented also only references case studies that delivered zero carbon standards such as the Code for Sustainable Homes Level 5, which is considerably different to the LETI definition. No evidence has been provided of any project that has achieved the LETI definition in the UK. 42/04 cont.
39. The Elementa Energy report established approximate costs in excess of £10,000 per unit (for the smallest apartments), with costs increasing with home size, to deliver against the LETI net zero carbon standard. The Oxfordshire County Council Energy Plan Report

references costs up to £19,500 per unit based on Bioregional assessment data. Using these numbers this represents a range of £22m - £42.9m when applied to 2,200 homes.

40. **The reports did not conclude whether it was financially or technically viable to deliver the development to these standards** (only the costs themselves are stated).
41. The Planning for the Future White Paper clearly states that it is the Government's intention for the Future Homes Standard to set a standard for new homes to be 'net zero carbon ready'. If homes are designated by national regulation to be net zero ready, then future large retrospective retrofit programmes are unlikely to be necessary to the scale referenced in the AAP.
42. The starting point for standards for a project like Salt Cross would be the Future Homes Standard. Any analysis of the potential need (or cost) for future energy efficiency measures (i.e. retrofit) needs to start at this point, not Building Regulations 2013 as presented by Elementa's report.
43. It is considered that it is inappropriate to lead the reader to think that providing ultra-low energy efficiency standards now avoids a £80 million cost in the future.
44. The analysis presented in Sections 5.2 and 5.3 (of the Elementa report) shows there are diminishing returns in terms of both carbon emissions and energy savings against the capital cost uplift as energy efficiency design standards get more stringent. For example, the net zero cost difference between 'good' standard and 'ultra-energy efficiency' presented in Figure 5.1.8 is £3,000 and the operational benefit between the two standards is £41 per annum. It would take 60+ years to see any financial benefit from this additional investment at the new build stage. In terms of carbon emissions there are likely to be lower cost solutions to avoiding or removing carbon, as evidenced in the Bioregional report, which would present a better investment to achieve net zero carbon.
45. As we stated in our response to the Affordable Housing SPD, it would be useful for the AAP to outline the different costs associated with a Building Regulations compliant form of housing against one with exemplary standards of fabric-energy efficiency, net-zero carbon in operation and 100% of its annual energy demand provided for by roof mounted solar advocated in the evidence. If this is not available, the uplift in costs associated with these extra features to meet aims beyond the provision of affordable homes **should inform the viability work required to justify such an uplift in standard**.
46. The ability to deliver 100% of energy supply from renewable energy sources requires further consideration. The evidence base has not considered the additional costs on the power distribution network to accommodate utility scale power generation within the development or potential export distribution capacity. In addition there is inconsistency within the evidence base on the quantum of onsite renewable generation needed, with the Bioregional Report recommending a minimum of 20% on site renewables and the Green Building Council definitions of net zero suggesting 'maximising' on site renewable with potential options to connect offsite, or offset remaining greenhouse gas emissions. Based on the presumption that the scheme could afford ultra-low energy efficiency

42/04  
cont.

levels, the 12MW of solar generation referenced in the evidence base (although the role of the energy demand for the significant element of commercial land is not clear) across the scheme would need to be supported by additional power infrastructure to cope with seasonal variations, distribution and export requirements of intermittent generation.

47. The ability to deliver utility-scale solar generation is dependent on the power infrastructure being designed to accommodate peak generations and lowest demand across the scheme (more substations, cable networks, active network management etc). Consideration of the ability and cost of both contestable and non-contestable power infrastructure design, including variable grid export capacity at different phases of the development, has not been undertaken to appraise whether such maximum peak power generation could be economically viable.
48. Whilst the AAP evidence provided suggests it is possible to achieve zero carbon (putting aside the concerns highlighted above), **how it is funded, implemented and monitored has not been resolved**. The ability to measure and verify the outcomes of the development outside the existing Development Control process is a known problem. For example, the responsibility for energy monitoring falls directly on the Distribution Network Operator (DNO) and energy retailer on completion of each unit not the developer as defined in national electricity regulation. Such cross sector regulatory control mechanisms have not been considered within the evidence base.
49. An analysis of the regulatory framework that spans local plan making, the energy sector and the building sector has not been undertaken. The principles need to be set in the context of this complex regulatory framework to ensure they are deliverable and viable through the statutory authorities and undertakers and their current remits.
50. How the UK Government defines greenhouse gas emissions within the national allocation plans is also a critical consideration, not least in terms of defining responsibility for emissions associated with energy, transport and materials. This lack of consideration for these cross cutting regulatory factors does not allow the conclusion that net zero carbon is any more viable at Salt Cross than for any other development in the UK.
51. **The ability to work towards a national approach to net zero carbon homes needs to be one that is flexible and progressive**. This cannot be achieved though through binary target setting in isolation to the wider issues at hand. An alternative approach to delivering net zero carbon is to set the vision and a process through which validation can be undertaken, rather than the current policy wording which defines prescriptive binary metrics which can be provided but at a cost to wider sustainability. Amended policy wording is suggested in the appendix to this representation.
52. It is estimated that the OPA proposals, through the measures outlined in the energy strategy which supports the proposals, will reduce carbon emissions compared with a standard 2013 Building Regulation compliant house by over 80% by aligning with the Future Homes Standards with the potential for this to be increased even further by the inclusion of low carbon technologies.

42/04  
cont.

53. The OPA has made the commitment to invest in supplying 20% of the energy demand through onsite renewable energy. In addition, it commits to working with local stakeholders such as Project Leo to explore, develop strategy and investment into increasing the potential for renewable energy generation and smart grid infrastructure, where it does not prevent development. The energy plan covers a larger area than the other evidence bases and considers opportunities of local energy generation. Grosvenor has, and continues to, engage positively with interested parties including members of the community as we seek to work towards these objectives.

### **Transport strategy, Modelling and interventions**

54. Grosvenor **welcome the additional detail** on the transport strategy and identified mitigation compared to previous versions of the AAP, where the intended transport strategy is clearer. However, costing, funding and the role of the County Council in relation to delivery is not clear across a number of items, as set out below.

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55. In response to the climate change challenge, the movement strategy for the Salt Cross OPA is underpinned by design interventions which seek to reduce the overall need to travel, in particular the need to travel short distances by private car, embedding active modes of travel into the design. The location of Salt Cross allows it to build on significant investment in sustainable transport over the next five years, including the Park and Ride, improvements to Hanborough station and the significant investment in the A40 which will deliver extensive bus priority, cycling provision and improved pedestrian crossings on the A40. The A40 will see significant investment of circa £143m which will deliver OCC's strategy. This investment is welcomed.

56. The **OPA Transport Assessment** provides details of the planning application proposals, the transport strategy which accompanies the proposals and the assessment of travel demand associated with the proposals. The transport modelling is based upon the same model used by OCC in the AAP evidence base and the assessment has been extensively scoped with OCC as part of the pre-application process.

57. The transport interventions included in the OPA proposals are subject to agreement with WODC and OCC. Delivery of many elements of this package will rely upon OCC. As one example, the Development will seek to deliver a walk and cycle route on the Site's frontage on Lower Road however it will also provide a financial contribution towards the remaining off-site Lower Road elements of the cycle route to Hanborough which could be delivered by OCC under their planning powers as the Highway Authority. As a result, the Development will contribute, alongside other development in the local area, towards the provision of these additional links but not deliver them in full directly.

58. With regard to the proposed underpass under the A40 it is not clear how an infrastructure obligation can be identified whilst the proposals are in such an early stage of development. Further feasibility work is understood to be progressing on this element but without a costed or implementable scheme design the **evidence base is not sufficient** to conclude this form of crossing should be a requirement. From the limited evidence base provided to Grosvenor to date it is unclear whether the underpass is deliverable or

viable as the likely cost and funding mechanism have not been suitably assessed. It is unclear how the scheme would be delivered at a suggested cost of £4-5m, what implications it would have for the A40 works and which developers will fund it, particularly as the rationale for this option “assumes that cost savings are gained through integrated construction of the subway with the A40 Science Transit 2 Scheme bus lanes”.

59. Furthermore, alternative solutions tested as part of the Non-motorised crossings of the A40 at Eynsham report (including bridge options) have been discounted without adequate justification and draft policy relies on one solution which has not been proven to be viable and deliverable. **The policy is therefore not effective.**

60. It is noted that the Transport Strategy report completed by Wood concludes the underpass ‘could potentially be delivered’. Therefore, the underpass, including specific design criteria outlined in the supporting text of the AAP, should not be a requirement in the AAP where a feasibility study/ design has not been proven to be possible or viable. The proposals are not therefore proven to be feasible and therefore fully justified as required. The AAP confirms the design and delivery costs will be met by developers but there is no consideration of viability or detailed understanding of the real costs and practicalities of such a solution. **Given such uncertainty over deliverability** it is suggested that policy should be amended to retain the option of a bridge crossing for the A40 and that more work is completed to justify the suggested costs of all options. There is also a need for the policy to recognise that the funding of the crossing facilities could be secured from other developers or other sources. Alternative wording is suggested in Appendix 1.

42/62  
cont.

61. Any financial obligations relating to transport measures in the AAP, including the crossing of the A40, needs to reflect wider obligations placed upon the Garden Village and therefore needs to have reference to **being subject to viability**. There should also be a reference, given the supporting text references the deliverability of the underpass with the secondary school, to the role of the Highway and/or Local Authorities to explore forward funding of this infrastructure to avoid delaying the delivery of the education provision at Salt Cross, given the progress of the West Eynsham Development. This is outlined in Appendix 1.

62. Policy 17 requiring car free development only ahead of OCC delivery of infrastructure would directly fetter the delivery of the Garden Village, especially to the increased delivery rates included as part of the draft AAP. The evidence base to support the AAP does not test the impact of the HIF/A40 proposals and has not tested any early phases of delivery to support this policy. This policy would add an unnecessarily restrictive approach not applicable to other housing proposals in the district who would also have an impact on the highway referenced.

42/90

63. Trigger points (associated with commercial floorspace / residential occupation) should be explored through the Section 106 and package of mitigation works associated with each phase, rather than a Grampian condition/overreliance on OCC delivery which prevents the build out of the Garden Village. **This policy as drafted represents a significant impact to the deliverability and early phase marketing of the Garden Village and should be removed.**

## *Public Transport and access*

64. The promotion of public transport as a key element of the movement strategy is **supported**. The strategy will deliver connections to key destinations that ensure the site is truly accessible and benefits from the planned investment in public transport proposed. 42/74
65. Vehicular access from the A40 to new development is presently being studied further by the County Council. It is proposed that there will be a new roundabout provided to access the Park and Ride site and the Councils are understood to be considering whether vehicular access from this to development is appropriate. As this is the case, it would appear wholly logical and appropriate to consider such access either north or south of the A40 and as such this junction also offers an opportunity to access the Garden Village site. Once further details of this study emerge the benefits and operational implications should be considered on that basis. **The AAP should not rule out such access to the Garden Village without any evidence base to do so.**

## *Car Parking*

66. The current proposals for car parking within the AAP appears to have no evidence base but goes much further than adopted policy in WODC, does not consider the objective of ENV 5 of the Eynsham Neighbourhood Plan and does not consider the likely local displacement of parking. The OPA incorporates car parking below OCC parking standards and the proposed parking provision for the development aims to balance the anticipated demand for parking by future residents whilst implementing reduced levels of car parking reflecting the accessibility of the site and investment in walking, cycling and public transport. The OPA proposals are considered appropriate as this will link to the delivery of infrastructure and services, to technological change and behavioural change. 42/80
67. The implication of a further reduced number of car parking spaces advocated in the AAP on the viability of the overall scheme, notably its attractiveness to the market and to a wide range of occupiers ranging from families to businesses, does not appear to have been considered in the AAP.

## **Conclusion**

68. As stated above, Grosvenor formally requests attendance at the upcoming hearing sessions. Viability and deliverability are the key theme to this response and cover a number of disciplines within the body of this letter and the appendix.
69. The ambitions of the AAP are shared by the OPA proposals. This is clear spatially, in the broad consistency between the OPA Parameter Plans and the illustrative spatial framework in the AAP, well demonstrating the outcome of years of collaboration with the authorities and the community. Whilst the OPA does not provide all the details (by its very nature) at this stage of the planning process, the role of conditions and future work 42/123

to support Reserved Matters Applications will show how the majority of the aspirations can be achieved in a way that is thoroughly evidenced, balanced and deliverable.

70. There is a significant evidence base that has been compiled across a number of disciplines to support the OPA which is publicly available and has been shared with the authorities through previous representations and also significant pre-app engagement. Given its substantive size, this is not appended to this representation but is perceived to support the position outlined within this representation.
71. It is Grosvenor's view that the AAP and its production should not unreasonably prejudice or delay the determination of the OPA, which is thoroughly and robustly evidenced using site specific survey work and evidenced strategies. This has allowed Grosvenor and their supporting technical teams to investigate, to a great level of detail, the evidence base produced to support the AAP and identify associated gaps and concerns.
72. This representation and accompanying appendix have outlined a series of modifications (although non-exhaustive) required to make the AAP sound, identifying where elements of the evidence base do not support the policies (justified) or are not deliverable (effective). Grosvenor recommends that these modifications should be made in advance of submission in order to increase the likelihood that the AAP is found sound.

Sincerely,



Paul Comerford  
Director



## Appendix 1: Identified objections and required amendments to the pre-submission draft AAP

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
Policy 2	<ul style="list-style-type: none"> <li>Entire policy</li> </ul>	<ul style="list-style-type: none"> <li>As set out more fully above, the current wording of the Net Zero Carbon Development policy does not fully consider the evidence generated on deliverability and affordability. The policy sets out a number of requirements that do not follow national methodologies for assessing energy demand in new homes; it sets targets that are not mandated by Government; and sets further targets that far exceed Government’s direction of travel as set out in the Future Homes Standard consultation.</li> <li>WODC need to consider the flexibility for non-residential occupiers as the nature of these operators and their energy demands and requirements are currently unknown. It might be the case that gas or energy sources other than electricity may become essential to the operation (in part or in full) of some of the light industrial/research and high-tech manufacturing uses, as well as schools and restaurants/pubs. As part of Reserved Matters Applications there will be a way to bring forward more details and suitable flexibility included.</li> </ul>	<p>Suggested Policy rewording as follows:</p> <ul style="list-style-type: none"> <li>Proposals for development at Salt Cross will be required to demonstrate an approach to being net zero carbon emissions ready in keeping with the national approach defined within the Future Home Standards (when adopted). This will include the use of low carbon and renewable energy technologies. An energy statement will be required with outline and detailed planning submissions to demonstrate alignment with this policy.</li> </ul> <p>Building fabric</p> <ul style="list-style-type: none"> <li>Proposal will need to show how the scheme will be designed to the future proposed changes in energy standards defined in the Future Homes Standard. This should be carried out as part of</li> </ul>

42/04

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			<p>any detailed planning submission. Overheating analysis must lead the building design in the context of expected increases in summer temperatures. Natural ventilation should be prioritised over active ventilation where possible. The need for air conditioning (cooling) should be avoided within new homes.</p> <p>Innovation and funding</p> <ul style="list-style-type: none"> <li>– Each reserved matters energy statement will need to show how arrangements have been sought to advance development to net zero carbon. This may include engagement with third party organisations such as Project LEO, community groups or the public sector to support viability, technology delivery and community benefit.</li> </ul> <p>Fossil fuels</p>

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
			<ul style="list-style-type: none"> <li>- Residential development will be expected to be fossil fuel free in order to be net zero carbon ready.</li> </ul> <p>Embodied carbon</p> <ul style="list-style-type: none"> <li>- Lifecycle analysis should be undertaken at all stages to support and inform reducing embodied carbon emissions. This should start with life cycling thinking at the outline planning application stage through to detailed embodied carbon analysis for each phase and Reserved Matters Application. Analysis should be compared to industry benchmarks for consideration and where possible strategies should be developed to reduce embodied carbon.</li> </ul> <p>Measurement and verification</p> <ul style="list-style-type: none"> <li>- Applicants should evidence engagement with either the distribution or independent</li> </ul>

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
			<p>distribution network operators to ensure the benefits of energy planning are incorporated into long term management regimes. A utility strategy for each Reserved Matters Application should be established to explore the evolution of good design and utility supply to ensure continual improvement is achieved.</p>
Policy 2 Supporting text	<ul style="list-style-type: none"> <li>- 5.33</li> </ul>	<ul style="list-style-type: none"> <li>- As referenced above, there is no such thing as an industry consensus definition, and it is not consistent in the Council’s evidence base documents.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
	<ul style="list-style-type: none"> <li>- 5.37</li> </ul>	<ul style="list-style-type: none"> <li>- It is incorrect to assume that the burden of £80 million not borne by the development, developer, council or homeowners should be considered here, notably as this is against 2013 build regulations compliant dwellings and not the OPA proposals or scenario three. The Planning for the Future White Paper clearly states that it is the Government’s intention for the Future Home Standard to be set so that homes will be net zero carbon ready. If homes are design by National Regulation to be</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>

42/05

42/06

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
		net zero ready, then future large retrospective retrofit programmes are unlikely to be necessary.	
	– 5.40	– Whilst we greatly support the idea and the principle of offsite energy generation to meet the needs of the garden village, the park and ride application submitted does not include any solar generation as referenced in this paragraph	– To be removed.
	– 5.43	<ul style="list-style-type: none"> <li>– The three evidence documents reference a wide range of uplift costs between £10,000 per unit up to £19,500 per unit to deliver net zero carbon.</li> <li>– There is inconsistency as to how these quoted figures represent the various definitions of net zero carbon, and how they have been applied to suggest only a 5-7% uplift in cost against Part L 2013.</li> <li>– It is incorrect to suggest that 5-7% (even if proven) is “only marginal” given the level of costs associated with a development of this scale.</li> </ul>	– WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment. This should also be considered as part of the viability base for the AAP.
	– 5.45	– Minimal consideration has been paid to the significant issues related to overheating when design to ultra-low energy efficiency standards, other than suggesting detailed over heating analysis will be needed at reserved matters. It is of particular concern that effort has been placed into defining “ultra-high fabric” heating standards (i.e. keeping heat in the buildings) only without considering overheating. The Bioregional report	– WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.

42/07

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42/09

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		<p>demonstrates that Oxfordshire continues to warm year on year. The evidence base does not consider this impact on end users in homes designed to ultra-high fabric standards. The evidence base has not considered the additional costs of retrofitting issues caused by overheating, the unintended consequences of homeowners retrofitting air conditioning or the social impacts in operation of homes designed to ultra-high standards.</p>	
	<ul style="list-style-type: none"> <li>- 5.46</li> </ul>	<ul style="list-style-type: none"> <li>- The Elementa Report, May 2020, did not assess the planning and legal issues surrounding the role of local authorities in setting independent energy use KPIs and calculation methods. The approach to assessing energy and carbon already has a clearly defined set of regulation and guidance within the Building Regulations Part L.</li> <li>- No evidence has been provided on how the AAP and the local planning authority can regulate and enforce independently created targets and calculation methodologies outside the existing national calculation methodology.</li> </ul>	<ul style="list-style-type: none"> <li>- Policies which use the suggested KPIs are not justified or effective.</li> </ul>
	<ul style="list-style-type: none"> <li>- 5.47</li> </ul>	<ul style="list-style-type: none"> <li>- Figure 5.6 shows such a range to the level of energy use for the commercial area that it cannot inform a policy. If the intention is that it would not inform a policy, it should not be included within the AAP. It is also not clear how the obligation for Primary and Secondary schools</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>

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42/11

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
		will impact the costs of the education provision, given the IDP estimates a cost of £35million (£15m +20m) for the primary and secondary school ahead of this policy draft.	
	– 5.50	– States that 70-100% of energy demand can be generated on roof area. What is the basis for this calculation and the housing mix assumption? What percentage are flats (i.e. with a shared roof)? Does this cover the energy demand of the commercial areas?	– WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.
	– 5.52	– This paragraph represents a theoretical exercise which is not based on a designed new development on this site, or including any other objectives (beyond optimising roof area) including place making.	– WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.
	– 5.54	– The Bioregional Report, November 2019, created to support the AAP noted a number of issues relating to the accounting mechanisms and double counting of carbon relating to embodied carbon. These issues were not addressed within any of the reports prior to making recommendations on requiring development to undertake embodied carbon assessments. In addition, the capacity to undertake embodied carbon assessments at outline planning is extremely limited due to the nature of the application (parameter based with no specific building design information). The Salt Cross outline application has though undertaken life cycle thinking within the Environmental Statement, the first	– Specific embodied carbon targets should not be enshrined in policy. The ability to enforce such independently established targets may be complicated and unmanageable as there will be a wide range of factors that will influence the development beyond the control of the local authority and developer. These issues were raised within the Bioregional Report which supports

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		step towards committing to undertake embodied carbon analysis at each reserved matters stage, if appropriate.	the AAP but not addressed in the draft.
	<ul style="list-style-type: none"> <li>- 5.55</li> </ul>	<ul style="list-style-type: none"> <li>- The recommendation was based on every new home being supplied with a smart meter. Such meters are owned by the distribution network operator (DNO) or energy retailer. They are bound under regulation by OFGEM. The ability to enforce such a recommendation would need to be placed on the owner of the energy meter not the developer.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
Policy 3	<ul style="list-style-type: none"> <li>- Proposals for development at Salt Cross will be required to embed the concept of the 'circular economy' and demonstrate a commitment towards reducing waste, increasing material re-use and recycling and minimising the amount of waste sent for disposal.</li> <li>- In support of any outline planning application for the whole garden village site and any major* reserved matters or other detailed applications, a waste</li> </ul>	<ul style="list-style-type: none"> <li>- It is not within the power of a land use plan or planning application to commit to recycling or disposal rates beyond the construction phase.</li> <li>- The URS referred to in this policy, as outlined in the supporting evidence base is estimated to cost over £4m and require over 545 bins (as it does not include provision for areas of employment). The nature of this as a commitment needs to be more thoroughly explored as it has no firm basis in the AAP as drafted.</li> </ul>	<ul style="list-style-type: none"> <li>- The first sentence of this policy should be amended to refer to the construction phase (within the control of developers) and exclude operation.</li> <li>- Reference to the URS should be removed from the AAP and instead considered within the Waste Strategy submitted as part of each appropriate planning application and feedback from WODC officers.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>strategy will be required demonstrating how the core components of the circular economy have been taken into account through appropriate design and construction solutions and opportunities to effectively manage waste on or near site.</p> <ul style="list-style-type: none"> <li>– This will include consideration of the potential use of advanced waste collection systems such as URS.</li> </ul>		
Policy 4	<ul style="list-style-type: none"> <li>– A Rapid Health Impact Assessment (HIA) will be required to accompany the outline planning application and any planning application for major development at the garden village, aligned with the emerging Oxfordshire HIA methodology, to fully identify the needs of everyone (including</li> </ul>	<ul style="list-style-type: none"> <li>– An application also cannot be aligned with an emerging Oxfordshire HIA methodology when this is not available (this was also identified during the Reg 18 AAP as a HIA should be developed in line with design development to help inform, and not begin at later in design development). The scope of the HIA has been discussed and agreed with WODC and Public Health Oxfordshire as part of the Health and Wellbeing liaison group established to support the project and ensure that health implications are at the forefront of the design process of the Development. The overall methodology is based on the Healthy Urban Development Unit (HUDU)</li> </ul>	<ul style="list-style-type: none"> <li>– This element of the policy to be removed.</li> </ul>

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	<p>vulnerable and excluded groups) in how they will live and work, access and use all types of infrastructure, services and networks.</p>	<p>Planning for Health Rapid HIA Tool, representing national best practise</p>	
<p>Policy 4 Supporting text</p>	<ul style="list-style-type: none"> <li>- Figure 6.1</li> </ul>	<ul style="list-style-type: none"> <li>- This figure identifies a number of strategies, such as “an important tool could be the adoption of a community development strategy” and a “cultural wellbeing strategy”. These requirements are not outlined in policy and instead focuses on a HIA. In supporting text to Policy 5 this is referenced again, particularly where it talks of new residents to determine focus of strategies. Elsewhere in the AAP supporting text there are much like more specific aspects, such as “intergenerational cooking clubs” which are more appropriate tools of the community development officer and should not be related to conditions on the OPA.</li> </ul>	<ul style="list-style-type: none"> <li>- AAP should be clear if these are suggested processes subsequent to the OPA, such as required conditioned documents or potential initiatives to be determined at subsequent planning stages.</li> </ul>
<p>Policy 5</p>	<ul style="list-style-type: none"> <li>- The appointment of a Community Development Officer will be needed early in the development stage of Salt Cross to empower and support the emerging community through an asset based community</li> </ul>	<ul style="list-style-type: none"> <li>- The nature of this obligation needs to be explored particularly how this is secured, length of time and the role of planning conditions. Given the potential need to support salaried staff, this may impact the S106 agreement and overall deliverability of the OPA.</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence.</li> <li>- Reference to condition should be removed as this will be covered by the obligation.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>development (ABCD) approach** and, if required, to help in the co-production of local strategies, such as a community development strategy, cultural wellbeing strategy and public arts strategy. This role will be secured and funded as appropriate through a planning condition or legal agreement.</p>		
Policy 6 Supporting text	<ul style="list-style-type: none"> <li>- 6.31</li> </ul>	<ul style="list-style-type: none"> <li>- Refers to an evidence base which is still underway and has not informed the requirements of the AAP. It should be clear that the intention of these strategies is to support refinement of proposals during the preparation of reserved matters applications and not to impact the OPA.</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>
Policy 7	<ul style="list-style-type: none"> <li>- The planning, design and delivery of Salt Cross will be underpinned by a comprehensive approach to the provision, maintenance and long term management of a high quality network of green and blue infrastructure, through the</li> </ul>	<ul style="list-style-type: none"> <li>- As stated in the AAP itself, this would not be possible to achieve at the outline stage as the Green Infrastructure provision will be determined further through Reserved Matters Applications. This is repeated later in the policy in reference to the "structural landscaping schemes" which is also not possible for the same reason.</li> </ul>	<ul style="list-style-type: none"> <li>- Reference to outline planning application should be removed, and state "as part of any major application" to allow for these documents to be submitted alongside Reserved Matters Applications or conditioned documents as appropriate.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>submission, for approval, of a Green Infrastructure Strategy with the outline planning application for the garden settlement. The strategy will also be expected to set out the governance and funding mechanisms and the maintenance plans for each element of the green infrastructure.</p>		
	<ul style="list-style-type: none"> <li>- An ambitious approach to green and blue infrastructure provision is expected for Salt Cross, with the requirement for 50% of the area to form the overall green infrastructure network and for the accessibility and quality standards and minimum quantitative standards for specific green infrastructure types to be met at the outline planning application stage, as set out in Tables 6.1 and 6.2.</li> </ul>	<ul style="list-style-type: none"> <li>- At 50% of the estimated 220ha SLG "area", this would equate for 110ha of GI network. This is unsubstantiated, inconsistent with Table 6.1 (also referred to in the same sentence) and is not site specific.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed and AAP based on evidence base prepared to support its preparation.</li> </ul>

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	<ul style="list-style-type: none"> <li>- Stewardship and maintenance arrangements for the GI network will therefore need to be addressed as part of any Community Management and Maintenance Plan (CMMP) or equivalent, submitted in accordance with Policy 31 – Long-Term Maintenance and Stewardship.</li> </ul>	<ul style="list-style-type: none"> <li>- There are significant levels of cross over within this policy, which refer to three separate documents (the CMMP, the Green Infrastructure Strategy, and then separately detailed phasing and management plans for all structural landscaping schemes and elsewhere in supporting text the Salt Cross Garden Strategy) to support management of the GI network.</li> </ul>	<ul style="list-style-type: none"> <li>- Management and maintenance regimes should be referred to in the maintenance and stewardship policy only, including a reference to Green Infrastructure if deemed appropriate to identify specifically.</li> </ul>
Policy 7 Supporting text	<ul style="list-style-type: none"> <li>- 6.74</li> </ul>	<ul style="list-style-type: none"> <li>- Additional GI in excess of evidenced standards has a maintenance cost. Paragraph 6.74 states that the GI strategy will need to outline a 30-year management and maintenance programme of works. This should be associated with detailed design as they have different requirements.</li> <li>- Green flag quality award not referenced/ covered by policy but mentioned as a KPI in Section 12</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed and position supported. The additional green infrastructure requirements have a significant cost to delivery and need to be robustly justified if they are to become planning obligations/ a requirement of policy.</li> </ul>
	<ul style="list-style-type: none"> <li>- 6.79</li> </ul>	<ul style="list-style-type: none"> <li>- Increase by 31% not justified and is arbitrary. Needs to look at the site specifically and the functionality (and multifunctionality) of the GI as outlined above.</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>

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		<ul style="list-style-type: none"> <li>– There is crossover in the types provided, notably allotments and community orchards. They are both provided for in the same FiT category.</li> </ul>		
	<ul style="list-style-type: none"> <li>– 6.80</li> </ul>	<ul style="list-style-type: none"> <li>– If the AAP is providing site specific GI approach and requirement (at a total of ~40ha) the reference to the TCPA guideline of 50% should be removed.</li> </ul>	<ul style="list-style-type: none"> <li>– To be removed.</li> </ul>	42/27
	<ul style="list-style-type: none"> <li>– 6.83</li> </ul>	<ul style="list-style-type: none"> <li>– The reference that the “distribution of specified green infrastructure types will be expected to accord with the illustrative framework plan” is incorrect as it does not have this level of detail and would otherwise prejudice plan making and detailed design. Reference should remain as aligned with the key principles of the evidence WODC design work.</li> </ul>	<ul style="list-style-type: none"> <li>– The reference should be amended to align with the principles of the illustrative spatial, although this is already covered by policy 28.</li> </ul>	42/28
	<ul style="list-style-type: none"> <li>– 6.84</li> </ul>	<ul style="list-style-type: none"> <li>– Reference to “the Government expects... the Government’s requirements” are unclear and the national standards it references should be identified.</li> </ul>	<ul style="list-style-type: none"> <li>– WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>	42/29
Policy 8	<ul style="list-style-type: none"> <li>– Development of the garden village will be required to create a healthy food environment through making provision for the growing of fresh, healthy food locally and for its consumption locally, minimising ‘food</li> </ul>	<ul style="list-style-type: none"> <li>– This policy is unenforceable from a land use perspective. The use of community facilities (and associated licences/ services) is a matter of management and should be considered as part of that process.</li> </ul>	<ul style="list-style-type: none"> <li>– WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>	42/30

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	miles' and establishing a short, sustainable food chain.		
	<ul style="list-style-type: none"> <li>- Opportunities for food growing include the provision of allotments, a community farm/orchard and the use of edible plants and flowers within the public realm (e.g. through the design of 'edible streets'/'living lanes').</li> </ul>	<ul style="list-style-type: none"> <li>- Allotment and community farm/ orchard standards are already covered by Policy 7.</li> </ul>	<ul style="list-style-type: none"> <li>- This element to be removed and additional requirements justified.</li> </ul>
	<ul style="list-style-type: none"> <li>- A food strategy should accompany the outline planning application, setting out the overall approach to food growing and consumption at the garden village making use of current good practice, including: an assessment of suitable areas for food growing consideration of approaches to achieve a diversity of food outlets; and the approach to</li> </ul>	<ul style="list-style-type: none"> <li>- This is disproportionate for an outline planning application and should remain as a driver for any GI provision as part of detailed design and management.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>incorporating edible plants within the public realm.</p> <ul style="list-style-type: none"> <li>- School provision should capitalise on any opportunities for co-location, e.g. with a community farm/orchard, to foster an early awareness food production, origin and seasonality and healthy eating.</li> </ul>	<ul style="list-style-type: none"> <li>- Whilst we support the intentions of this element of the policy, the location of the school is based on joint discussions with OCC as the Local Education Authority and which are also reflected in the illustrative spatial framework</li> <li>- Additional requirements such as this are unlikely to be able to be added to the procurement of an education provider or as part of the presumption process. Again, this is more with a community initiative or education programme, rather than land use policy and would need to be delivered by the County, and not the applicant</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
Policy 8 Supporting text	<ul style="list-style-type: none"> <li>- 6.89</li> </ul>	<ul style="list-style-type: none"> <li>- This standard is not a policy in the ENP or the AAP (as the IDP uses a different method for projecting need for allotments) so this paragraph should be removed and the ENP already includes this design advice and covers the SLG and is part of the development plan</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed</li> </ul>
Policy 9	<ul style="list-style-type: none"> <li>- Biodiversity will be a prominent feature of the garden village, providing a diversity of wildlife-rich habitats and features within natural green spaces, buildings, formal green spaces and gardens. The</li> </ul>	<ul style="list-style-type: none"> <li>- This element of the policy does not aid in the determination of a planning application and is already covered by national policies.</li> </ul>	<ul style="list-style-type: none"> <li>- Suggest this is removed entirely or to be changed to supporting text.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>impacts on biodiversity must be properly assessed using the mitigation hierarchy with a focus on minimising negative impacts and providing on-site mitigation and only then providing compensation for loss of biodiversity.</p>		
	<ul style="list-style-type: none"> <li>– Development at Salt Cross will be required to demonstrate an overall biodiversity net gain of 25%. This will be measured using the DEFRA Biodiversity Metric Version 2.0 (or subsequent updated versions).</li> </ul>	<ul style="list-style-type: none"> <li>– 25% BNG on this site is not justified or effective, as outlined in the main body of this letter.</li> <li>– References to the Beta metric should be included as this AAP will be submitted ahead of the final metric being made available.</li> <li>– Any proposals for offsite mitigation should be referenced as subject to viability given the substantial costs associated with achieving increased targets, as well as the substantial cost of delivering on-site gain given the high ecological baseline of the site.</li> </ul>	<ul style="list-style-type: none"> <li>– To be amended to remove overreliance metric approaches and allow a bespoke approach to the inherent qualities of the site to be brought forward in a holistic manner. This should include a more nuanced qualitative and quantitative assessment, based on site-specific characteristics.</li> <li>– The principal focus of the policy should be optimising on-site gain in a way that also fulfils other placemaking and Garden Village principles and strikes the right balance between ambition, certainty in achieving environmental outcomes, and deliverability and costs for</li> </ul>

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			<p>developers. Any departure from the emerging national target of 10% should be supported by a strong evidence base related to the Garden Village site.</p>
Policy 9 Supporting text	<ul style="list-style-type: none"> <li>- (Monitoring KPI)</li> </ul>	<ul style="list-style-type: none"> <li>- Condition surveys of Local Nature Reserves are not justified as they are not related to development or any evidence provided that LNRs will be impacted by the development proposals. The OPA contains significant levels of open space to serve new and existing populations.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
	<ul style="list-style-type: none"> <li>- 7.18</li> </ul>	<ul style="list-style-type: none"> <li>- The emerging Environment Bill (next committee currently delayed until December 2020) contains much more detail on how the housing industry will deliver biodiversity net gain, notably requiring a council strategy to achieve gain in a holistic manner and projects identified which can secure gain in the long term.</li> </ul>	<ul style="list-style-type: none"> <li>- Scale of ambition should be related to the site and not arbitrarily uplifted with further understanding of the site. The site has a significant baseline and current proposals have taken significant steps to ensure a biodiversity net gain is achieved on site. There is a need to WODC to look at the site in a bespoke way, considering the quantum of development allocated by WODC and overall viability and</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
			deliverability of offsite mitigation explored.
	– 7.27	– The emerging Nature Recovery Network presented in Figure 7.2 and the Statement “Salt Cross lies within the ‘recovery zone’ of the NRN and the development would affect the integrity of the network by reducing the amount of land available for nature’s recovery” covers an allocated Strategic Location for growth (since 2018 but proposed in preparation for the Oxford Growth deal as far back as 2016). This statement should be removed, alongside the 20% target which is not pursued in the AAP draft.	– To be removed.
	– 7.31/7.51	– The specific reference to an arable wildflower mitigation and compensation strategy being needed should be removed. Any detail within this document will already be covered by the mitigation scheme proposed by the OPA and the future LEMP; building on the principles within the submitted Biodiversity Mitigation, Monitoring and Management Framework. The need for repeat surveys is not justified to be completed every year. During the production of a Reserved Matters Application the suitability of the arable plant surveys (as with all surveys completed in support of the outline) will be assessed.	– To be removed.
	– 7.36	– The OPA has already submitted a Biodiversity Mitigation, Monitoring and Management Framework. Compensation is a specific form of mitigation (alongside	– Title of document to remain as Reg 18 and agreed submission document list for clarity.

42/40

42/41  
42/45

42/42

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<ul style="list-style-type: none"> <li>- 7.46/ 7.47</li> </ul>	<p>Avoidance for example) so is an unnecessary change from the agreed submission list and would aid in clarity for those reviewing the OPA documents.</p> <ul style="list-style-type: none"> <li>- The rationale for an extra 5% (circa 29 units, with a value of ~£580,000 using the AAP values, noting these are different from site specific surveys completed by the applicant which have been provided to WODC) being added "due to the status of the site as a landscape and green infrastructure-led 'garden village' and in recognition of the need to aim high and achieve a greater level of investment for the natural environment in order to reduce the impact of the climate and ecological emergencies" is not justified and not site specific. This is an overreliance on a metric approach and does not have an understanding of the current value on site. Beyond this, the assertion that "the biodiversity net gain requirement is not expected to affect the financial viability of housing developments (up to the +20% scenario)" also fails to recognise that the government's response to the consultation on biodiversity net gain which states that "on balance, we believe requiring 10% gain strikes the right balance between ambition, certainty in achieving environmental outcomes, and deliverability and costs for developers. Legislation will therefore require development to achieve a 10% net gain for biodiversity".</li> </ul>	<ul style="list-style-type: none"> <li>- Further justification is required to demonstrate that 25% Biodiversity Net Gain is deliverable (and viable) on this site.</li> </ul>

42/43  
42/44

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
	<ul style="list-style-type: none"> <li>- 7.53</li> </ul>	<ul style="list-style-type: none"> <li>- The AAP should not require specific management methods, notably the use of specialist wardens and/or rangers which the AAP references "must be incorporated into this strategy". This is one of many options for a management and mitigation strategy as part of a condition of any outline permission.</li> </ul>	<ul style="list-style-type: none"> <li>- This sentence should be removed to make sure the AAP is justified and considers alternative approaches to mitigation and management.</li> </ul>	42/46
	<ul style="list-style-type: none"> <li>- 7.66-7.75</li> </ul>	<ul style="list-style-type: none"> <li>- This section identifies a series of sites where the Council intend to spend the financial contribution provided by the development. Further information would be required in terms of delivery responsibility and the role of key stakeholders (the AAP suggests TOE (Trust Oxfordshire Environment), deliverability and further work required to identify how the contribution is fairly and reasonably related to development at the site and how the obligation would be secured, notably in terms of land acquisition).</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>	42/47
Policy 10	<ul style="list-style-type: none"> <li>- Achievement of this high quality will need to be demonstrated through the use of Building with Nature standards; at the design stage of development, a Design Award accreditation will be required, and in the following stages the delivery of exemplary Green and</li> </ul>	<ul style="list-style-type: none"> <li>- This requirement (BwN) is already within Policy 7</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed to avoid repetition.</li> </ul>	42/48

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>Blue Infrastructure will be required through the Full Award - Excellent accreditation.</p>		
	<ul style="list-style-type: none"> <li>- In terms of water demand, an assessment is required of the impact of development on water demand.</li> <li>- For wastewater and water quality, a focused local strategy is required to be undertaken and submitted with the outline planning application, based on an assessment of the wastewater network capacity, highway drainage systems, water quality conditions and flood risk, including impact on the receiving River Thames. The strategy should set out details of a comprehensive waste water conveyance and treatment solution for the Garden Village, the phasing of new waste water and</li> </ul>	<ul style="list-style-type: none"> <li>- This process is undertaken by Thames Water and is not a requirement of any applicant. The responsibilities of Thames Water in relation to this development are already well outlined by national legislation and this should not be a feature of this policy. The phasing of the development will be governed by the occupation triggers within the Section 106 and the wider Phasing Strategy for the development. The role of the SuDS system is also covered by earlier provisions of the policy.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>highway drainage infrastructure and measures to ensure there will not be an adverse impact in water quality or an increase in the risk of sewer flooding as a result of waste water flows from the development.</p>		
Policy 10 Supporting text	<ul style="list-style-type: none"> <li>- 7.78</li> </ul>	<ul style="list-style-type: none"> <li>- The proposed Development / Area Action Plan is not able to control the water quality in the wider area.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
	<ul style="list-style-type: none"> <li>- 7.81/82</li> </ul>	<ul style="list-style-type: none"> <li>- The West Oxfordshire Local Plan already identifies the need in the area to adopt the optional sustainable building regs compliant water usage of 110 litre per person per day. Neither of these targets are included as policy requirements.</li> </ul>	<ul style="list-style-type: none"> <li>- Unsubstantiated targets (especially where they differ between two consecutive paragraphs and also Local Plan Policy OS3/Policy 10) should be removed or further evidenced.</li> </ul>
	<ul style="list-style-type: none"> <li>- 7.85/7.86</li> </ul>	<ul style="list-style-type: none"> <li>- Permitted discharge rates are the responsibility of the water authority, Thames Water, and it is not within control of any applicant. As a result, the wastewater study should not be referenced as Thames Water are governed by national legislation and guidance. Any applicant, by existing national legislation, must ensure that an agreement is in place to provide capacity in line with development. As a result, this paragraph should be removed as it is redundant and misrepresents the role of</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
		the developer in the water quality of the surrounding area.	
Policy 11 Supporting text	– 7.107/7.108	– The reference that the “Developer will need to consider whether detailed air quality modelling would be needed to inform an appropriate assessment” should be removed. The role of appropriate assessment, and that of the competent authority and applicant in this process, is covered by the HRA regulations and the project is already supported by a HRA prepared on behalf of the council. Please also note that Natural England have already confirmed, via their consultation response to the OPA, that “Natural England considers that the proposed development will not have likely significant effects on the Oxford Meadows Special Area of Conservation and has no objection to the proposed development”. Given the position of the OPA, the lack of a ‘shadow’ HRA on the agreed submission document list, the lack of request from the Case officer for any information required to undertake an appropriate assessment, the applicant’s testing to support the application and the Natural England response, this suggested obligation should be removed.	– To be removed.
	– 7.110	– Opening sentence to be amended to clarify that light pollution, rather than just lighting, can have negative effects on human health.	– To be amended as per comment.

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<ul style="list-style-type: none"> <li>- 7.112</li> </ul>	<ul style="list-style-type: none"> <li>- This sentence should be updated to reflect the new operator. Furthermore, the "noise issues" from the aggregate recycling facility should be clarified that the operation is capped by planning conditions with limit noise and are enforced the West Oxfordshire. These rates, including consideration of a fully operational facility, have been considered in the buffer areas and mitigation proposals within the OPA proposals.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended in line with comment.</li> </ul>
Policy 12	<ul style="list-style-type: none"> <li>- A pro-active approach must be demonstrated in the form of a Conservation Management Plan which should consider the significance of relevant heritage assets, identify how new development can make a positive contribution to local character and distinctiveness and examine and outline a suitable and appropriate strategy for future use, management and maintenance of the heritage assets with the purpose of conserving and /or enhancing their significance.</li> </ul>	<ul style="list-style-type: none"> <li>- This element of the policy should be amended to include the proviso that this is only required where it is assessed that a heritage asset is impacted by a proposed development and mitigation not identified. There is also a significant level of overlap between many of the identified bullets which will be covered by other documents required as part of any planning application, notably the LVIA work.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended in line with comment.</li> </ul>

42/58

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<ul style="list-style-type: none"> <li>- Increasing public understanding of the history of the site through further investigation and the creation of an outdoor education/heritage facility, heritage trail and open days during any archaeological investigation</li> </ul>	<ul style="list-style-type: none"> <li>- This element of the policy is dependent on the agreed mitigation strategy and will be determined through the DM process, not policy writing.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed from policy.</li> </ul>
Policy 12 Supporting text	<ul style="list-style-type: none"> <li>- 7.139</li> </ul>	<ul style="list-style-type: none"> <li>- The nature of the waste in this location should be clarified in this sentence to provide greater clarity regarding the nature of the 'waste'.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended.</li> </ul>
Policy 14	<ul style="list-style-type: none"> <li>- A grade-separated crossing (underpass) shall be provided between the Garden Village and Eynsham. The Salt Cross and West Eynsham Strategic Development Area developers will need to cover the design and construction costs of the underpass, with costs reasonably apportioned.</li> </ul>	<ul style="list-style-type: none"> <li>- The underpass, including specific design criteria outlined in this supporting text, should not be a requirement in the AAP where a feasibility study/ design has not been proven to be possible or viable.</li> <li>- There should be an awareness, given the supporting text referencing linking the delivery of the underpass with the secondary school, that there should be a role of the Highway Authority to forward fund this infrastructure to avoid delaying the delivery of Salt Cross given the current position of the West Eynsham Development SPD.</li> </ul>	<ul style="list-style-type: none"> <li>- Policy to be sufficiently flexible to accommodate other grade separate crossings, such as a bridge crossing option, potentially with additional text reflecting a need to equivalent attractiveness to users, to allow alternative solutions to crossing the A40 until the deliverability of the proposed solution is proven.</li> <li>- As currently drafted, this policy is insufficiently flexibility and does not allow for the eventuality that the obligation is undeliverable.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
			<ul style="list-style-type: none"> <li>- Any financial obligation in the policy needs to reflect wider obligations placed upon the site and therefore needs to have reference to as being subject to viability. Alternative wording should be "a financial contribution towards the cost of the grade separated crossing will be obtained from the Garden Village which is fair and reasonably related to the development proposals" as this does not preclude funding from other sources both developers and public money.</li> </ul>
	<ul style="list-style-type: none"> <li>- Segregated cycle and pedestrian provision via Lower Road to Hanborough Station shall be provided, with segregated facilities for cyclists and pedestrians also the preference within the Garden Village</li> </ul>	<ul style="list-style-type: none"> <li>- Wording does not reflect land ownership or other deliverability considerations.</li> </ul>	<ul style="list-style-type: none"> <li>- Suggested amendment "Funding for an off-carriageway cycle route on Lower Road up until the railway bridge shall be provided. The cycle route will utilise the existing highway verge. Where insufficient verge is available, under the railway and north of the railway, on carriageway cycle facilities shall be provided. Segregated facilities for cyclists</li> </ul>

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
			and pedestrians will also be delivered along the site frontage with Lower Road and within the Garden Village boundary”.	
	<ul style="list-style-type: none"> <li>- Specific cycle and pedestrian zones will be included within the masterplan such that access for motor vehicles will be restricted at certain times (or at all times) to specific streets, or networks of streets.</li> </ul>	<ul style="list-style-type: none"> <li>- This policy should also allow for the potential of public transport, emergency vehicles and disabled access to use restricted areas as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>- Suggested amended wording “ Specific cycle and pedestrian zones will be included within the masterplan such that access for motor vehicles will be restricted at certain times (or at all times) to specific streets, or networks of streets with the exception of public transport, disabled access and emergency vehicles.</li> </ul>	42/65
	<ul style="list-style-type: none"> <li>- Financial contributions towards off-site cycle parking provision will be required including at Hanborough Station, Eynsham Park &amp; Ride, Eynsham Village Centre and Oxford City Centre.</li> </ul>	<ul style="list-style-type: none"> <li>- Relationship of the proposed development and cycle parking in Oxford City is not justified or reasonably related to the development.</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>	42/66
	<ul style="list-style-type: none"> <li>- A40 Corridor improvements</li> </ul>	<ul style="list-style-type: none"> <li>- The detail of surrounding improvements should be removed from the policy where contribution to the A40 improvements is already outlined.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>	42/67

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<ul style="list-style-type: none"> <li>The concept of 'school streets' will be promoted, including along Cuckoo Lane and on other roads linking to the schools. Cuckoo Lane will be closed to through traffic whilst ensuring properties at the southern end are accessible.</li> </ul>	<ul style="list-style-type: none"> <li>The responsibilities of the Local Education Authority should be clear in the delivery of the school (and these design considerations and funding) and consistency with the school access requirements further elaborated.</li> <li>Policy 14 needs to reflect that the school street and closure to through traffic on Cuckoo Lane is dependent on the County Council accepting this approach as well as the delivery of the Western access. The AAP should clarify that the approach to stopping up Cuckoo Lane will be led by OCC and the location of the stopping up and retained access considered further.</li> </ul>	<ul style="list-style-type: none"> <li>Suggested alternative wording: “ Upon the delivery of the western access and connection to Cuckoo Lane, the County Council will endeavour to close the southern end of Cuckoo Lane to through traffic whilst ensuring properties at the southern end are accessible ” .</li> </ul>
	<ul style="list-style-type: none"> <li>Smart Technology: Provision of infrastructure to enable the smart, real-time monitoring of the take up of sustainable transport modes and car use must be provided within the Garden Village and on roads in the vicinity of the site.</li> </ul>	<ul style="list-style-type: none"> <li>It is not clear how this is related to the development and the nature and costs of monitoring need to be further justified as part of the Framework Travel Plan.</li> </ul>	<ul style="list-style-type: none"> <li>WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>
	<ul style="list-style-type: none"> <li>The speed limit along the A40 in the vicinity of Eynsham will be reduced from the National Speed</li> </ul>	<ul style="list-style-type: none"> <li>The Mott evidence bases suggest a reduction to 40 mph, rather than 50mph, and the difference is not explained in the AAP.</li> </ul>	<ul style="list-style-type: none"> <li>WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>

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Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
	Limit to a maximum of 50 mph.	<ul style="list-style-type: none"> <li>It is not only the A40 where the speed limit will need to be reduced - there will also need to be reduced speed limits on Lower Road, Cuckoo Lane and an extension of the 30mph limit on the A4095</li> </ul>		
Policy 14 Supporting text	<ul style="list-style-type: none"> <li>8.20</li> </ul>	<ul style="list-style-type: none"> <li>The last sentence appears to contradict with requirements elsewhere to provide a permeable village / greenways.</li> </ul>	<ul style="list-style-type: none"> <li>Delete "and in particular be designed so that people are 'funnelled' towards using the grade separate crossing" .</li> </ul>	42/71
	<ul style="list-style-type: none"> <li>8.21</li> </ul>	<ul style="list-style-type: none"> <li>The reference to 'provision' of a segregated cycle route should be amended to a financial contribution towards given the applicant would be unable to deliver this route as it is outside of the AAP boundary and will instead be delivered by the Highway Authority.</li> </ul>	<ul style="list-style-type: none"> <li>To be amended to better reflect practical delivery mechanisms and recognise the role of the applicant.</li> </ul>	42/72
	<ul style="list-style-type: none"> <li>8.22</li> </ul>	<ul style="list-style-type: none"> <li>Pre-application discussions were focused on improved PROW access to Freeland and not Church Hanborough.</li> </ul>	<ul style="list-style-type: none"> <li>To be further outlined as a requirement of the development.</li> </ul>	42/73
Policy 15	<ul style="list-style-type: none"> <li>The planning application for the Park &amp; Ride includes an 850-space car park, whilst the Local Plan Policy allows for 1,000 spaces. Consideration should therefore be given to</li> </ul>	<ul style="list-style-type: none"> <li>The Park and Ride application (still in determination) should respond to Local Plan Policy with the determining authority appraising its conformity with policy and up to date evidence of need accordingly. As a result, the remainder of the Garden Village site (in separate ownership) should not be responsible for making up the additional spaces. If additional spaces were to be</li> </ul>	<ul style="list-style-type: none"> <li>To be removed.</li> </ul>	42/75

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	accommodating means for future expansion of the site.	required, then OCC should consider how these could be accommodated on the Park and Ride through decking and future proof the layout accordingly without implication for the public transport access to the Garden Village.	
	<ul style="list-style-type: none"> <li>- S106 planning obligations will be required to secure financial contributions towards the A40 Corridor infrastructure schemes and the required repayment of the HIF funding secured to facilitate the delivery of these schemes ahead of the receipt of S106 funding.</li> </ul>	<ul style="list-style-type: none"> <li>- Whilst the provision of a contribution towards these works may be acceptable, it will depend on the scale as well as the overall viability of the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>- Level of proposed contribution should be caveated as subject to further viability testing given that the AAP is not supported by up to date evidence base.</li> </ul>
	<ul style="list-style-type: none"> <li>- Land will be safeguarded along the southern boundary of the Garden Village to support widening of the A40 to accommodate the bus lanes and shared foot/cycle paths.</li> </ul>	<ul style="list-style-type: none"> <li>- Level of land to be safeguarded needs to be outlined.</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>
	<ul style="list-style-type: none"> <li>- Additional car parking at Hanborough Station</li> </ul>	<ul style="list-style-type: none"> <li>- Seeking a contribution towards additional parking at Hanborough Station may undermine the utility and desirability of the Lower Road Cycle route</li> </ul>	<ul style="list-style-type: none"> <li>- Contribution further justified in the round. WODC to further evidence, amend and redraft in revised AAP (such as suggested</li> </ul>

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42/77

42/78

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
			modifications) in light of comment.
Policy 15 Supporting text	<ul style="list-style-type: none"> <li>- 8.37</li> </ul>	<ul style="list-style-type: none"> <li>- It is likely too far to expect residents / employees to walk to Hanborough Station and the text should be amended to reflect cycling and public transport.</li> <li>- Whilst the task force proposals are supported there is no certainty these will be delivered. It is unlikely that a commercial scheduled bus service will be deliverable and there is no evidence that this is a realistic proposition given the demand concerned and operational challenge of connecting to train services which at present are not high frequency. The evidence base documents suggest DRT and the AAP wording should better align.</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.</li> </ul>
Policy 16	<ul style="list-style-type: none"> <li>- The areas of the site that will be car free development (minimum 15% of total dwellings).</li> </ul>	<ul style="list-style-type: none"> <li>- 15% is not currently justified. 15% car free is 330 dwellings and whilst some of these may be able to be Retirement Flats this is still a very significant proportion and will reduce the attractiveness and have a commercial cost as outlined in the body of this representation. It should also be clarified that if there is to be car free development it would seem appropriate that this is exempt from any S106 in terms of the A40 improvements.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
	<ul style="list-style-type: none"> <li>- Applications</li> </ul>	<ul style="list-style-type: none"> <li>- Should be clarified that the Spatial Car Parking Management Plan applies only to detailed design (for</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended.</li> </ul>

42/79

42/81

42/82

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
		example, digital mapping of the locations of car parking) and not the outline planning application.	
	<ul style="list-style-type: none"> <li>- Parking restrictions - including any Controlled Parking Zones (CPZs) required within Salt Cross and the wider Eynsham area. This will include any restrictions that may be required to discourage displaced parking to the Park &amp; Ride.</li> </ul>	<ul style="list-style-type: none"> <li>- It should be clarified that the OPA will only be able to include these measures within its boundary and that parking in the wider Eynsham Area and Park and Ride are managed by others and subject to separate decision making bodies. The management of the P&amp;R will be for OCC to determine and cannot be controlled by the Garden Village promoters. Given the parking will most likely be free and long-term it will be very challenging to restrict people using the P&amp;R in practice if the proposed parking levels in the AAP are progressed.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
	<ul style="list-style-type: none"> <li>- Provide for appropriate levels of EV charging within each parking area; EV charging points must be provided at the following locations within the Garden Village: <ul style="list-style-type: none"> <li>o All residential properties with a parking space</li> <li>o 50% of non-allocated parking spaces</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Policy should include "have access to" as outlined in 8.45</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended.</li> </ul>

42/83

42/84

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<ul style="list-style-type: none"> <li>○ 25% of non-residential development parking spaces</li> </ul>		
	<ul style="list-style-type: none"> <li>– The absolute maximum car parking provision shall be 1 space per 60 m2 of employment space with residential provision as below: <ul style="list-style-type: none"> <li>○ 1 bed units - 0.75 non-allocated per property</li> <li>○ 2 &amp; 3 bed units - 1 off-street bay per property</li> <li>○ 4+ bed units - 1 off-street bay per property plus the equivalent of 1 non-allocated bay per property</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>– The employment suggested parking is not flexible to the use and form of employment and would be very low for this location for Class E office space (formerly B1a). Displaced parking to P&amp;R and Eynsham village is very likely on this basis especially given the AAP seeks to guide the location of the commercial areas.</li> <li>– The text on the residential parking assumes that all the 1 bed units are unallocated, and all the 2 and 3 bed units and 4 bed units have off street bays which is unduly restrictive, lacks flexibility and is disproportionate for policy purposes.</li> </ul>	<ul style="list-style-type: none"> <li>– The policy should not seek to define parking arrangements ahead of detailed design and should refer to overall quantum of car parking only (although this is subject to the actual levels being to be justified and effective at this stage). The preferences for off street bay parking are suggested to be outlined in supporting text as an alternative.</li> </ul>
	<ul style="list-style-type: none"> <li>– An effective monitoring approach will be required, utilising smart technologies which should be set out in an</li> </ul>	<ul style="list-style-type: none"> <li>– There is no need to include a requirement for a separate innovation plan when Travel plans require details of monitoring. Whilst comprehensive, it is not clear how live monitoring will actually relate to the Travel Plan and</li> </ul>	<ul style="list-style-type: none"> <li>– Amendment to align with existing OPA strategy and agreed submission documents.</li> </ul>

42/85

42/86

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>Innovation Plan and linked into the Framework Travel Plan. Monitoring data will need to be provided to the Council directly via an Application Programming Interface (API) to enable live, integrated monitoring of travel patterns and Travel Plan targets.</p>	<p>outcomes. Any costs associated with capturing data should be considered in the round of S106.</p>	
<p>Policy 16 Supporting text</p>	<p>– 8.38</p>	<p>– Whilst the principle of maximising containment is supported, the AAP should not reference the relationship between the phasing of housing and employment delivery. These are separate markets and supporting text should not be used to limit either employment or housing delivery on a strategic site without adequate justification.</p>	<p>– This should be removed from the AAP.</p>
	<p>– 8.49</p>	<p>– Targets for off-peak hours are undefined and unnecessary. Travel plans should be focused on peak demand hours instead.</p>	<p>- Delete reference to off peak targets.</p>
	<p>– 8.50</p>	<p>– Relationship of Subsidiary Travel plans to future applications should be clarified, outlining that subsidiary Travel Plans submitted as part of Reserved Matters Applications should cover individual land uses within that application, and do not necessarily require a separate Subsidiary Travel Plan for each land use. This</p>	<p>– To be amended to clarify applicability of travel plans for Reserved Matter Applications.</p>

42/87

42/88

42/89

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
		may be appropriate for large scale employers or schools however.	
Policy 17	<ul style="list-style-type: none"> <li>- Repetition</li> </ul>	<ul style="list-style-type: none"> <li>- Policy 17 includes reference to the Innovation Plan referred to in Policy 16 and also includes reference to the S106 obligations contained within Policy 15</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>
	<ul style="list-style-type: none"> <li>- A spine road through the site, accessed from the 'Western Development Roundabout' on the A40, west of the Park &amp; Ride access junction. This should be a through road in at least the early phases of development although the route should be future-proofed to enable it to be bisected (allowing for walk, cycle and bus access only) in future years if traffic conditions on the external road network enable this</li> </ul>	<ul style="list-style-type: none"> <li>- Given the layout of the site and distance involved there is very unlikely to be a through route in the early phases of development as that will mean building and connecting from western roundabout to Lower Road.</li> </ul>	<ul style="list-style-type: none"> <li>- References to the phasing of development will be enshrined in the S106 and the AAP should be amended to allow for the deviation from a through route when evidenced and deemed acceptable.</li> </ul>
	<ul style="list-style-type: none"> <li>- Measures to deter through traffic travelling between the A40 and A4095 via Cuckoo Lane and Freeland village. A change in priority on Cuckoo</li> </ul>	<ul style="list-style-type: none"> <li>- Changing the priority in this location cannot be safely achieved as it would reduce forward visibility too much.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed from the AAP and a solution refined throughout the identification of transport mitigation as part of the determination of the OPA</li> </ul>

42/91

42/92

42/93

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<p>Lane to discourage traffic routing through Freeland village must be provided and technologies to support monitoring of the effectiveness of this will be required.</p>		
	<ul style="list-style-type: none"> <li>- Development proposals must be aligned and integrated with the A40 Corridor Strategy and proposed A40 Corridor improvements along the A40, in addition to other infrastructure improvements in the wider area. Construction and phasing of the development must be co-ordinated with other works on the A40. The number of houses that can be accessed via a single road link should comply with OCC's 'Residential Road Design Guide (2003) - Second Edition (2015)</li> </ul>	<ul style="list-style-type: none"> <li>- This draft policy wording means this version of the design guide is used indefinitely for the development in this regard. That is not practical, and policy should reflect the guide may change or be amended over time. Indeed paragraph 6.25 of AAP text refers to new Street Design Guide being produced by OCC and it would be inconsistent to have two guides with different approaches trying to be adhered to.</li> </ul>	<ul style="list-style-type: none"> <li>- The guide remains a material planning consideration without direct reference in policy. This element of the policy to be removed and individual planning applications determined accordingly with the most up to date guidance produced by OCC.</li> </ul>

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<ul style="list-style-type: none"> <li>- All commercial uses at the Garden Village must be supported by a Delivery and Servicing Plan to reduce and mitigate the impact of deliveries on the local road network e.g. through freight consolidation.</li> </ul>	<ul style="list-style-type: none"> <li>- The policy should identify a minimum threshold size/ type for commercial uses which require a Delivery and Servicing Plan to be fairly and reasonably related to the scale of the proposal.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended to identify threshold or add in 'as agreed with the authority' to allow flexibility in application.</li> </ul>
	<ul style="list-style-type: none"> <li>- Any laybys impacted by proposed access arrangements must be mitigated/ relocated with any associated costs of doing this funded by the Salt Cross/ West Eynsham SDA developments as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>- "All costs" potentially includes any land acquisition costs associated with securing a layby as well as the construction costs. OCC are currently reviewing the holistic nature of the A40 Strategy, including bus lanes and junction improvements and laybys should be considered as part of the implementation process of the HIF schemes.</li> </ul>	<ul style="list-style-type: none"> <li>- It is not clear how proposals at Salt Cross would be responsible for, or fairly and reasonably related to development, for the impact of the wider HIF proposals. As a result, there is a need for AAP to further justify this requirement or remove this from the AAP.</li> </ul>
	<ul style="list-style-type: none"> <li>- First occupation of Salt Cross (unless car-free) will not be permitted until completion of the A40 bus lanes, and completion of the junction improvements at Pear Tree roundabout.</li> </ul>	<ul style="list-style-type: none"> <li>- This policy would directly fetter the delivery of the Garden Village, especially to the increased delivery rates included as part of the draft AAP. The evidence base to support the AAP does not test the impact of the HIF/A40 proposals and has not tested any early phases of delivery to support this policy.</li> <li>- This approach would add an unnecessarily restrictive approach not applicable to other housing proposals in</li> </ul>	<ul style="list-style-type: none"> <li>- Trigger points (commercial and residential) to be explored through the section 106 and package of mitigation works associated with each phase, rather than a Grampian condition/overreliance on third party delivery which prevents build out of the Garden Village.</li> </ul>

42/95

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42/97

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
		<p>the district who would also have an impact on the areas referenced.</p>	<p>This policy as drafted represents a significant impact to the deliverability and early phase marketing of the garden village and should be removed.</p>
Policy 18	<ul style="list-style-type: none"> <li>- Provision will be made at Salt Cross for a campus of around 40 ha set within an extensive network of green and blue infrastructure to accommodate science, technology, engineering and high-tech related B-class business floorspace.</li> </ul>	<ul style="list-style-type: none"> <li>- Policy does not reflect use class amendments. Additional references to Class E should be added, although the contribution of B class uses should remain as they are an intrinsic part of the advanced manufacturing offer (this should also change paragraph 9.7 and 9.29)</li> </ul> <p>The policy (and supporting text elsewhere in the AAP) would be much easier to monitor if the policy referred only to the 80,000m<sup>2</sup> in the policy to allow for alternative proposals which could provide the same quantum of floor space in a more efficient manner which would require less developed land but still provide the same economic benefits.</p>	<ul style="list-style-type: none"> <li>- To be amended in line with suggested indicators.</li> </ul>
Policy 22	<ul style="list-style-type: none"> <li>- Residential development proposals at Salt Cross will be expected to demonstrate exemplary design standards alongside a commitment to the acceleration of housing delivery. This should be in</li> </ul>	<ul style="list-style-type: none"> <li>- It is inappropriate for the AAP to include a requirement (notably additional documents) to demonstrate housing delivery rates in excess of those provided by the applicant to support the Local Plan and the Eynsham Infrastructure Delivery Plan. It would also be useful for WODC to outline how the evidence which has led to the</li> </ul>	<ul style="list-style-type: none"> <li>- Policy 22 should be limited to identifying the number of new homes expected on the site, as the relationship to the provision of infrastructure outlined in the IDP is covered by Policy 30. Reference to detailed delivery mechanisms</li> </ul>

42/98  
42/99  
42/100

42/101

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
	the form of a housing delivery statement (or equivalent) which includes consideration of the following measures:	conclusion that non-traditional housing delivery can speed up delivery rates at Salt Cross.	should be removed, as previously identified at earlier stages of the AAP, to avoid fettering delivery or flexibility.	
Policy 23	<ul style="list-style-type: none"> <li>- Affordable homes proposed as part of the overall mix of development should demonstrate 'genuine affordability'.</li> </ul>	<ul style="list-style-type: none"> <li>- The remainder of this policy outlines affordable housing to national policy and types of affordable home. The reference to 'genuine affordability' should be removed as this does not align with any formal type of affordable housing and is not defined within the AAP.</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further define the term (eg as an appendix or in supporting text) or remove.</li> </ul>	42/103
	<ul style="list-style-type: none"> <li>- Affordable rent should be set having regard to the living rents identified in Table 10.2 and capped at no higher than the Local Housing Allowance (LHA) limits set out in Table 10.2 (and any subsequent updates).</li> </ul>	<ul style="list-style-type: none"> <li>- To ensure longevity of policy, the reference to Table 10.2 and subsequent updates should be removed and replaced with a reference to the Local Housing Allowance.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended to remove reference to table 10.2.</li> </ul>	42/104
Policy 23 Supporting text	<ul style="list-style-type: none"> <li>- 10.43-45</li> </ul>	<ul style="list-style-type: none"> <li>- The memorandum of understanding with Oxford City should be completed ahead of submission of the AAP.</li> </ul>	<ul style="list-style-type: none"> <li>- To meet the principles of Duty to Cooperate considerations and for the plan to be positively prepared.</li> </ul>	42/105
Policy 25	<ul style="list-style-type: none"> <li>- To ensure that Salt Cross provides opportunities for</li> </ul>	<ul style="list-style-type: none"> <li>- There are a number of forms of housing which fall into the self and custom build housing. The AAP, like the</li> </ul>	<ul style="list-style-type: none"> <li>- WODC to further evidence, amend and redraft in revised AAP</li> </ul>	42/107

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
	<p>community-led housing and individuals to build or commission their own homes, at least 5% of the total number of homes will be set aside as serviced plots for the purposes of custom and self-build housing.</p>	<p>Local Plan, should include marketing requirements should the opportunity not be taken up. An increase over the 5% is currently unjustified and need not identified. The 110 homes would be more than the current District’s expression of interest and three times the amount of EOIs that have currently expressed an interest in Eynsham (as referenced in paragraph 10.62). Further details are required on what WODC mean by serviced and how this is to be provided.</p>	<p>(such as suggested modifications) in light of comment.</p>	42/107
	<ul style="list-style-type: none"> <li>– Serviced plots will be expected to be provided in clusters of 10 or more homes, included as part of each phase of development across the garden village as a whole and set out in a Phasing Plan.</li> </ul>	<ul style="list-style-type: none"> <li>– It may not be appropriate to include custom and self-build opportunities in each phase as this will be dependent on location, cluster sizes and relative infrastructure burden, amongst other considerations. The form of housing delivery will be agreed on a phase by phase basis as part of each Reserved Matters Application, subsequent design coding and in line with the development’s housing strategy.</li> </ul>	<ul style="list-style-type: none"> <li>– To be removed.</li> </ul>	42/108
	<ul style="list-style-type: none"> <li>– A mix of custom and self-build housing tenures, including the provision of affordable homes will be sought as a proportion of the overall 50% affordable housing requirement at Salt Cross.</li> </ul>	<ul style="list-style-type: none"> <li>– To be effective, the policy should refer to “as a proportion of the overall affordable housing requirement”, covered and caveated separately in the AAP.</li> </ul>	<ul style="list-style-type: none"> <li>– To be amended as suggested.</li> </ul>	42/109

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
Policy 25 Supporting text	– 10.70	– It would be inappropriate to identify the location of custom and self-build opportunities without a further understanding of context derived through Reserved Matters Applications. The obligation to provide (alongside associated parameters including marketing and release conditions) will be included within the S106.	– To be removed.	42/110
Policy 26	– Proposals for education and employment-linked housing will be supported as part of the overall mix of housing at Salt Cross.	– Whilst this policy suggests an in-principle support for this form of specialist housing, there are no details or mechanisms provided for this will be provided on site or its relationship to Affordable housing provision.	– WODC to further evidence, amend and redraft in revised AAP (such as suggested modifications) in light of comment.	42/111
Policy 26 Supporting text	– 10.88	– References to 'relatively modest cost increases' should be removed until this policy has been demonstrated in viability work, in line with national policy. The currently open consultation on raising accessibility standards for new homes suggests that an average of £1,400 per unit is a more appropriate estimate from a building reg compliant dwelling to a M4(2) compliant dwelling than that referenced in the AAP housing strategy, which uses older figures from the original consultation. Applying this (as a simplistic calculation) to an additional 75% of homes (beyond the local plan policy) is over £2 million pounds.	– To be removed.	42/112
Policy 27	– Entire policy	– This policy references aspects of existing policies and should not be included as part of the AAP to ensure clarity, reduce inconsistency with other policies and to	– To be removed.	42/113

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
	<ul style="list-style-type: none"> <li>- Accord with and not prejudice the delivery of, any agreed overall masterplan for the garden village site;</li> </ul>	<ul style="list-style-type: none"> <li>- Reference to agreed masterplan should be updated to align with other references to the illustrative spatial framework.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended where applicable.</li> </ul>	42/114
Policy 27 Supporting text	<ul style="list-style-type: none"> <li>- 11.12</li> </ul>	<ul style="list-style-type: none"> <li>- To be updated to align with the amended Use Class order.</li> </ul>	<ul style="list-style-type: none"> <li>- To be updated.</li> </ul>	42/115
Policy 28	<ul style="list-style-type: none"> <li>- An appropriate mix and quantum of community uses as part of the village centre and neighbourhood centres, including land which is to be reserved for general medical use to enable the future expansion/re-location of primary health care facilities;</li> </ul>	<ul style="list-style-type: none"> <li>- References to reservation of land for general medical use should be removed as this does not reflect the latest position or sought obligation from the Oxfordshire CCG.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>	42/116
	<ul style="list-style-type: none"> <li>- A comprehensive, detailed masterplan will be required at the outline planning application stage, reflecting the key elements of the</li> </ul>	<ul style="list-style-type: none"> <li>- This element of the policy should be amended to include "An appropriately detailed masterplan..." to reflect the outline nature of the application.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended to "An appropriately detailed masterplan...".</li> </ul>	42/117

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.	
	illustrative Spatial Framework Plan			
	<ul style="list-style-type: none"> <li>- Repetition</li> </ul>	<ul style="list-style-type: none"> <li>- The number of homes, employment floor space, sustainable transport hub, Green Infrastructure are covered by previous policies.</li> </ul>	<ul style="list-style-type: none"> <li>- To be removed.</li> </ul>	42/118
Policy 28 Supporting text	<ul style="list-style-type: none"> <li>- Table 11.1</li> </ul>	<ul style="list-style-type: none"> <li>- Use classes included for the employment zone are inconsistent with the uses referenced in policy 18 and in footnote 2 on page 151</li> <li>- The reference to 850 car parking spaces is inconsistent with the Local Plan policy and Policy 15 which references expansion (although this is suggested to be amended by this Appendix)</li> <li>- Whilst there is a need to ensure that GI calculations and public open space design should create usable spaces, it is not clear why the uses in Table 11.1 have been excluded from the overall projections, notably drainage infrastructure and incidental open space.</li> </ul>	<ul style="list-style-type: none"> <li>- To be updated.</li> </ul>	42/119
	<ul style="list-style-type: none"> <li>- 11.16</li> </ul>	<ul style="list-style-type: none"> <li>- The Illustrative Spatial Framework identifies a series of key structuring principles to help guide the determination of future planning applications. It is the role of the Parameter Plans submitted as part of the outline planning application which set the overall parameters within which any more detailed design must come forward.</li> </ul>	<ul style="list-style-type: none"> <li>- Suggest this paragraph is removed and the AAP relies upon Paragraph 11.15</li> </ul>	42/120

Policy	Relevant text extract (non-exhaustive) or reference in draft AAP	Commentary on draft text	Suggested amendments, refinement or identified need for additional work to be made sound.
	<ul style="list-style-type: none"> <li>- 11.42</li> </ul>	<ul style="list-style-type: none"> <li>- Clarity is sought on the role of 'allocating' a burial ground compared with the Eynsham IDP position as outlined in that document and paragraph 11.72</li> </ul>	<ul style="list-style-type: none"> <li>- If the AAP is identifying a burial ground 'allocation', additional feasibility evidence, identification of need and costing estimates are required to support this requirement. WODC to outline if this is a sought contribution.</li> </ul>
Policy 31	<ul style="list-style-type: none"> <li>- This and other suitable options should be explored through the submission of a Community Management and Maintenance Plan (CMMP) or equivalent which will be required in support of any outline and where appropriate, detailed planning applications.</li> </ul>	<ul style="list-style-type: none"> <li>- Policy or supporting text to clarify (in line with OPA strategy) that an appropriately detailed stewardship strategy will be required to be approved at subsequent planning stages, such as a condition of the outline, ahead of occupation, or as part of the S106.</li> </ul>	<ul style="list-style-type: none"> <li>- To be amended in line with comment.</li> </ul>

42/121

42/122

**Appendix 2: 20/01734/OUT planning application boundary and blue line plans**



Thames Valley Branch

Secretary  
Andrew McCallum

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5th October 2020

Dear Sirs,

**SALT CROSS GARDEN VILLAGE AT EYNSHAM - AREA ACTION PLAN CONSULTATION**

I am writing on behalf of Railfuture\* Thames Valley and thank you for the opportunity to comment on the WODC Area Action Plan relating to the Garden Village proposals.

In general we support the proposal as, compared with Witney and Chipping Norton, it will locate new housing closer to much of the employment in the County as well as providing employment within its own boundaries and an opportunity for more sustainable transport. 43/01

We welcome the Plan overall as it is built around the importance of climate change and environmental policies (e.g. electric charging points), reducing the need for travel by car, improvements to air quality (policy 11) and opportunities for active travel.

As an organisation we are particularly interested in proposals for improving public transport and facilities for walking and cycling. We are therefore limiting our comments to Section 8. 43/02

We are pleased that, compared with the first draft AAP in 2018, importance is now given to Hanborough Station and links thereto. We welcome that financial contributions will be required for improvements to the station and access and to the North Cotswold Line Transformation. However, it will be vital that these improvements are in place before new houses and businesses are occupied so that new occupiers make their travel decisions knowing about the actual rail services. Borrowing should therefore be put in place for these contributions to achieve up front delivery, paid back from the s.106 contributions over time. This would follow a similar approach to that set out in the first paragraph on page 148 for the delivery of the A40 Corridor infrastructure schemes.

Whilst the AAP in Fig 8.1 states that it should be possible for buses to penetrate all areas of the Village, it could be helpful to stress the design standards required (road widths, radii, absence of on street parking, etc). We are concerned that bus stops could be more than 400m from dwellings if there is a high frequency service. Passengers are less likely to walk such a distance in inclement weather, thereby going against the

basic principle of the AAP to reduce the use of the private car. It will also be important to future proof connections to Hanborough Station, for example by making infrastructure provision for autonomous “pods” or similar.

43/02  
cont.

It will be vitally important that the proposals and policies set out in the AAP are supported by the independent examiner and are not watered down as a result of submissions from potential developers. To that end it will be important that WODC has a very strong team at the Examination able to rebut developers’ concerns about the required standards and the viability of the necessary financial contributions. The scheme has the potential to be an exemplar development, future proofed to deal with climate change and other environmental and health issues.

We should be pleased if you would take our comments into account but come back to us if you need further clarification on the points we have raised.

This response has been researched and prepared by our committee member, Nigel Rose.

Yours sincerely,



Richard Stow,

Chairman

Railfuture Thames Valley Branch

*\* Railfuture is a national voluntary organisation, campaigning for improved rail services and promotion of the contribution rail can make to sustainable transport. In the Thames Valley we have several hundred members, including the affiliation of most local Rail User Groups. We are independent of the industry, political parties and trades unions, and always seek to put rail users first, be they freight or passengers.*

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<http://www.railfuture.org.uk>

Please find comments on the Area Action Plan for the proposed Garden Village of Salt Cross from Councillors Carl Rylett and Dan Levy, in whose ward the village sits.

We are broadly speaking very supportive of the AAP, which if fully implemented, would enable Salt Cross in many ways to be an exemplar Garden Village. It is however worth pointing out that we do not believe that the location is appropriate for development, and although that particular argument can no longer be won, we owe it to the residents of our ward to reiterate that we were opposed to the development. Now that the development is almost certain to go ahead, we want it to be as good as possible, both for new residents of Salt Cross and for the existing residents of Eynsham and other parts of West Oxfordshire. We therefore have a number of observations to this end.

44/01

We support the overall ambitions of the AAP, to make Salt Cross a low-carbon, healthy, thriving place. The existing Eynsham Community took an active part in developing the AAP, working closely with the excellent WODC officer team over the past 2 years or so, and the AAP is a credit to them all.

Salt Cross was envisaged as a separate community to Eynsham, but this really does not reflect the reality of its location, nor the benefits of the two communities working together. We are pleased that this is, to some extent, recognised within the AAP, for instance by the secondary school having a site in each of Eynsham and Salt Cross. Services and facilities should complement and avoid harm to existing Eynsham – we want people to shop, drink and eat in each village, and in particular for people to use the local retailers in Eynsham. In the fullness of time, we would expect Eynsham residents to use shops, restaurants and pubs in Salt Cross. Medical Services will be provided in one of the villages but not both. Sports facilities will continue to be delivered in Eynsham – eg the gymnasium and football team – as well as potentially in Salt Cross. We support the requirement of a Health Impact Assessment, learning from other recent projects e.g. Healthy New Towns, about how good planning can benefit the health of residents

44/01  
cont.

We want community cohesion in both villages and the villages combined, and would welcome the development of measures to encourage community development in Salt Cross, including a community centre, pleasant public spaces and adequate sport facilities to complement those in Eynsham, and we hope used by residents of both.

To make both villages work there needs to be easy, direct, safe access to each from the other, for people using bicycles, walking, wheelchair users, etc. Unaccompanied children must be able safely to cross the A40 to get to and from schools and other facilities. The weakest part of the AAP relates to the A40 crossings. It envisages an underpass to link Old Witney Road and Cuckoo Lane, on the grounds that such a route is the most direct link between the two parts of Barthomew School (notwithstanding that most pupils will be going to one or other and not both sites each day) and 3 at-grade signalled crossings between there and the Eynsham Roundabout. No improvement appears to have been planned for the Eynsham Roundabout to make it safely usable for bike users and pedestrians. We cannot see how under such conditions the A40 can be anything but a barrier

44/02

between the two halves of the community, unless traffic flows on the A40 are significantly impaired. Only additional non-grade crossings or rerouting of the A40 can square this circle.

We welcome the AAP's commitment to making the Garden Village a place in which car usage is discouraged and active travel prioritised. There should be more detail about how this will be achieved. We note that the County Council insists on the spine road being for through traffic – however much through traffic is discouraged, given the probable congestion on the A40, we expect the spine road to be used by drivers, and this is greatly to be regretted. Within the Garden Village, walking and cycling must be quicker and more direct than the use of cars, and where cars and active travellers meet, the latter must be given priority.

44/02  
cont.

There is an assumption that the County Council will go ahead with the proposed Park and Ride and bus lane project, and that this will encourage residents and users of the business facilities to use public transport rather than private vehicles. As the P&R has yet to be given planning permission, we would expect the AAP to provide alternative arrangements in the event of it not being built. In any case, we think it unduly optimistic to think that the A40 will be able to cope with the new development in the Garden Village, North Oxford. Witney and West of Eynsham– it is already highly congested, as is the B4044. In addition, the AAP envisages but does not make mandatory, a bike route and bus provision to Hanborough Station – both this and the B4044 bike route to Botley, plus a safe bike crossing (which realistically would have to be a bridge or underpass) at Eynsham Roundabout, ought to be part of the AAP. If safe and direct bike routes are available for use between the two villages and between the villages and places people wish to go, then they will be used.

We fully support the aim in Policy 2 of setting an obligation of net zero carbon emissions. The Council's commissioned reports make it clear that this is achievable and viable, especially given high house prices in the area. We would expect such a position even if it reduces the capital gain made by the landowners, and this should not be used as a reason to diminish the quantum of affordable housing. Particularly given the scale of the application and likely duration, it is important to anticipate the raised environmental standards which government at all levels are virtually certain to make to address the climate emergency, and to apply them even if central government lags behind West Oxfordshire.

44/03

The Eynsham area also benefits from local expertise who together have the knowledge to help implement a project to make local, green sustainable energy as long as appropriate policies are in place to facilitate, e.g. Project Leo and Eynsham's Smart and Fair Neighbourhood.

Policy 4 and 7 -

We would like to see the 'Health promoting infrastructure' and 'Green Infrastructure' closely integrated with existing Eynsham village for a wider benefit. Clearly this AAP only refers to the site north of the A40, but the community of residents will cover both villages.

44/04  
44/05

#### Policy 9

There may be opportunities for Eynsham to benefit from off-set biodiversity gain. We could argue a 25% gain really is achievable with some off-setting, especially considering the local Nature Recovery Network community project and local expertise which is undertaking environmental work in the older village.

44/06

#### Conclusion.

The AAP is an ambitious and commendable document, in the main. The area in which it is deficient relates to transport and primarily to the crossing of the A40. While we recognise the difficulty of finding solutions to this problem, without it there is a real danger that the Garden Village will not properly develop, nor be sufficiently integrated with Eynsham, and ambitions for the Garden Village to avoid car-dependency will be dashed – clear examples are that school pupils need to cross the A40, people will have to get to the Medical Centre (whether it be on its existing site or elsewhere) and it would be much better if people bought food in Eynsham rather than driving to Witney or Oxford.

44/07

With the exception of this significant failing the AAP represents a blue print for an excellent garden village, and we urge there to be no diminution to its key measures between this proposal and its adoption, and for it to be used rigorously to inform future planning applications, with an expectation that only applications fully in compliance with the AAP will be approved.

**From:** [Gaskell, Chris](#)  
**To:** [Planning Policy \(WODC\)](#)  
**Cc:** [Chris Hargraves](#)  
**Subject:** Salt Cross Garden Village - Area Action Plan Consultation  
**Date:** 30 August 2020 09:08:30  
**Attachments:** [image001.png](#)  
[image002.jpg](#)  
[image003.png](#)  
[image004.png](#)

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Planning Policy / Chris Hargraves,

Thank you for your message below, together with your link, regarding the above topic / location.

I can confirm that, at this present time, I have no further comments to make over and above those already made in my letters, together with attachments, dated 5 September 2016.

45/01

If you are unable to 'locate' these letters, then if required / requested, I will be able to provide electronic copies.

Regards,



**Chris Gaskell**

Network Connections Planning Engineer

T: [REDACTED]

Internal: [REDACTED]

E: [REDACTED]

1 Woodstock Road, Yarnton, Kidlington, Oxfordshire, OX5 1NY

[www.ssen.co.uk](http://www.ssen.co.uk)



---

**From:** West Oxfordshire Planning Policy Consultations (do not reply) <do-not-reply@planningconsultation.westoxon.gov.uk>

**Sent:** 28 August 2020 15:01

**To:** Gaskell, Chris [REDACTED]

**Subject:** [EXTERNAL] [OCGVAAP19] Salt Cross Garden Village - Area Action Plan Consultation - Invitation to Join

WARNING: this email has originated from outside of the SSE Group. Please treat any links or attachments with caution.

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## West Oxfordshire Planning Policy Consultations

### Salt Cross Garden Village - Area Action Plan Consultation

You've been invited to participate in the **Salt Cross Garden Village - Area Action Plan Consultation** consultation by the consultation manager, OMurray.

This consultation is open from 28 Aug 2020 at 00:00 to 23 Oct 2020 at 23:59.

Dear Sir/Madam

Salt Cross Garden Village Draft Area Action Plan (AAP)

You will be aware that land to the north of the A40 near Eynsham is allocated for development in the West Oxfordshire Local Plan in the form of a new garden village. Known as 'Salt Cross,' the garden village will be led by a new Area Action Plan (AAP).

The District Council has now prepared a final draft version of the AAP which it proposes to submit to the Secretary of State for independent examination. The AAP establishes a vision for Salt Cross, supported by a series of core objectives and policies which will be used to guide future development proposals as they come forward.

Before the AAP can be submitted, it must be published for a statutory period of public consultation which is running for 8-weeks from Friday 28th August 2020 until Friday 23rd October 2020.

The draft AAP and a range of supporting documents have therefore been published on the Council's website at [www.westoxon.gov.uk/gardenvillage](http://www.westoxon.gov.uk/gardenvillage)

Paper copies will shortly be made available in the following libraries which have re-opened following the Covid-19 crisis:

- Carterton Library - 6 Alvescot Road, Carterton, OX18 3JH
- Chipping Norton Library - Goddards Lane, Chipping Norton, OX7 5NP
- Eynsham Library - 30 Mill Street, Eynsham, OX29 4JS
- Witney Library - Welch Way, Witney, OX28 6JH
- Woodstock Library - The Oxfordshire Museum, Fletcher's House, Park Street, Woodstock, OX20 1SN

For further information on library opening times please visit:

<https://www.oxfordshire.gov.uk/residents/leisure-and-culture/libraries/reopening-libraries>

Should more libraries re-open during the 8-week consultation period, paper copies will be made available in those locations accordingly.

We would very much welcome your comments on the draft AAP and these can be made in writing, or by way of electronic communications.

The options for responding are set out below.

- Online by registering at <http://planningconsultation.westoxon.gov.uk>
- By completing and returning the AAP standard response form which can be downloaded at [www.westoxon.gov.uk/gardenvillage](http://www.westoxon.gov.uk/gardenvillage)
- By sending an email to [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)
- By writing to Planning Policy Team, West Oxfordshire District Council, Elmfield, New Yatt Road, Witney, OX28 1PB

As the consultation relates to the submission draft AAP, comments should be focused on three main issues; whether the AAP is 'legally compliant', whether it is 'sound' and whether the Council has complied with its statutory duty to co-operate. Further information is set out in a guidance note which is available to download at [www.westoxon.gov.uk/gardenvillage](http://www.westoxon.gov.uk/gardenvillage)

Any representations may be accompanied by a request to be notified at a specified address of any of the following:

- the submission of the AAP for independent examination under section 20 of the Act,
- the publication of the recommendations of the person appointed to carry out an independent examination of the AAP under section 20 of the Act; and
- The adoption of the AAP.

All representations received will be made publicly available and will also be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

If you have any questions or require further clarification, please feel free to contact me on the number above.

Yours faithfully

Chris Hargraves  
Planning Policy Manager

### [Participate in this consultation](#)

To change your email alerts, please visit [the website](#)

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[www.ssen.co.uk](http://www.ssen.co.uk)

\*\*\*\*\*



Power Distribution

1 Woodstock Road

Yarnton

Kidlington

Oxfordshire

OX5 1NY

( Tel [REDACTED]  
+ eMail [REDACTED]

Your reference:

In Any Reply Please Quote: CJG/EGV\_Site\_OHL

**WEST OXFORDSHIRE DISTRICT COUNCIL**

**ELMFIELD**

**NEW YATT ROAD**

**WITNEY**

**OX28 1PB**

For the attention of :- PLANNING POLICY TEAM

**5 September 2016**

- Mr Andrew Thomson

Dear Sir,

**Eynsham Garden Village (EGV)**

I refer to the recent 'Expression of Interest' submitted to Government at the end of July 2016 regarding the above location.

This is a strategic growth option for housing and development land areas, which are typical of a number of recent sites across Southern England, where insufficient discussion has taken place between planning authorities and ourselves, prior to planning permission being granted. I attach a copy of a letter sent to all chief planning officers in our licence area in March 2012, which summarises the situation.

45/02

The land concerned is crossed by various 33,000 volt (ehv) overhead lines (solid green) and 11,000 volt (hv) overhead lines (solid red), as detailed in the table below, which form an essential and integral part of Southern Electric Power Distribution's wider network and as such must be retained.

For your information and assistance, underground cables are indicated by a dashed line, with red for hv and green for ehv.

Area	132kV	ehv	hv
Eynsham Garden Village	0	2	5

Development beneath the overhead lines or diversion / undergrounding of the overhead lines may not be possible, in which case the development as planned would be unable to proceed.

No contractual arrangements have been agreed with any developer for modification of the above circuit/s. Therefore, any conditions imposed, should permission be granted, must be on the developer and not the Distribution Network Operator, as is the case for other existing infrastructure.

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www.ssepd.co.uk

To ensure that the proposal is deliverable, you may consider it best to impose a requirement on the developer to agree contractual arrangements with Southern Electric Power Distribution for any modifications prior to permission being granted.

We would consider the granting of planning permission without further discussion and agreement as to how our equipment can be accommodated within the proposal to be unacceptable.

For your information and assistance, I have attached a copy of our GIS Mains Record showing the equipment affected for the above location detailed in the above table.

Clearly, the above principles would apply to any development area, which is crossed by ehv and/or hv overhead lines.

Yours faithfully,

A solid black rectangular box used to redact the signature of Chris Gaskell.

Chris Gaskell  
Network Investment Engineer

Your reference:

In Any Reply Please Quote: CJG/EGV\_Site\_DOM

**WEST OXFORDSHIRE DISTRICT COUNCIL**  
**ELMFIELD**  
**NEW YATT ROAD**  
**WITNEY**  
**OX28 1PB**

( Tel [REDACTED]

+ eMail [REDACTED]

**5 September 2016**

For the attention of :- PLANNING POLICY TEAM

- Mr Andrew Thomson

Dear Sir,

**Eynsham Garden Village**

I refer to the recent 'Expression of Interest' for Eynsham Garden Village (EGV) that West Oxfordshire District Council submitted to Central Government at the end of July 2016.

The EGV is a strategic growth option, which, at this stage, I can only provide general guidance on the provision of electricity infrastructure and the treatment of any existing infrastructure in relation to future development.

45/03

Connections for new developments from existing infrastructure can be provided subject to cost and time-scale.

Where existing infrastructure is inadequate to support the increased demands from the new development, the costs of any necessary upstream reinforcement required would normally be apportioned between developer and DNO (Distribution Network Operator) in accordance with the current Statement of Charging Methodology agreed with the industry regulator (OFGEM). Maximum time-scales in these instances would not normally exceed around 2 years and should not therefore impede delivery of any proposed housing development.

Where overhead lines cross development site, these will, with the exception of 400 kV tower lines, normally be owned and operated by Scottish and Southern Energy Power Distribution (SSEPD).

In order to minimise costs, wherever possible, existing overhead lines can remain in place with uses such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not practicable, or where developers choose to lay out their proposals otherwise, then agreement will be needed as to how these will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits. The existing customer base should not be burdened by any costs arising from new development proposals.

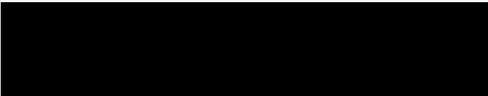
To ensure certainty of delivery of a development site, any anticipated relocation of existing overhead lines should be formally agreed with SSEPD, prior to submission of a planning application.

## **Conclusion**

I trust the above is helpful to you at this current stage of your deliberations, but you can contact me directly on the above telephone number should you require any further advice.

However, for your information and assistance, please see the attached **Appendix A**, which includes additional information in respect of the EGV.

Yours faithfully,



Chris Gaskell  
Network Investment Engineer

## **APPENDIX A**

The identified areas are :-

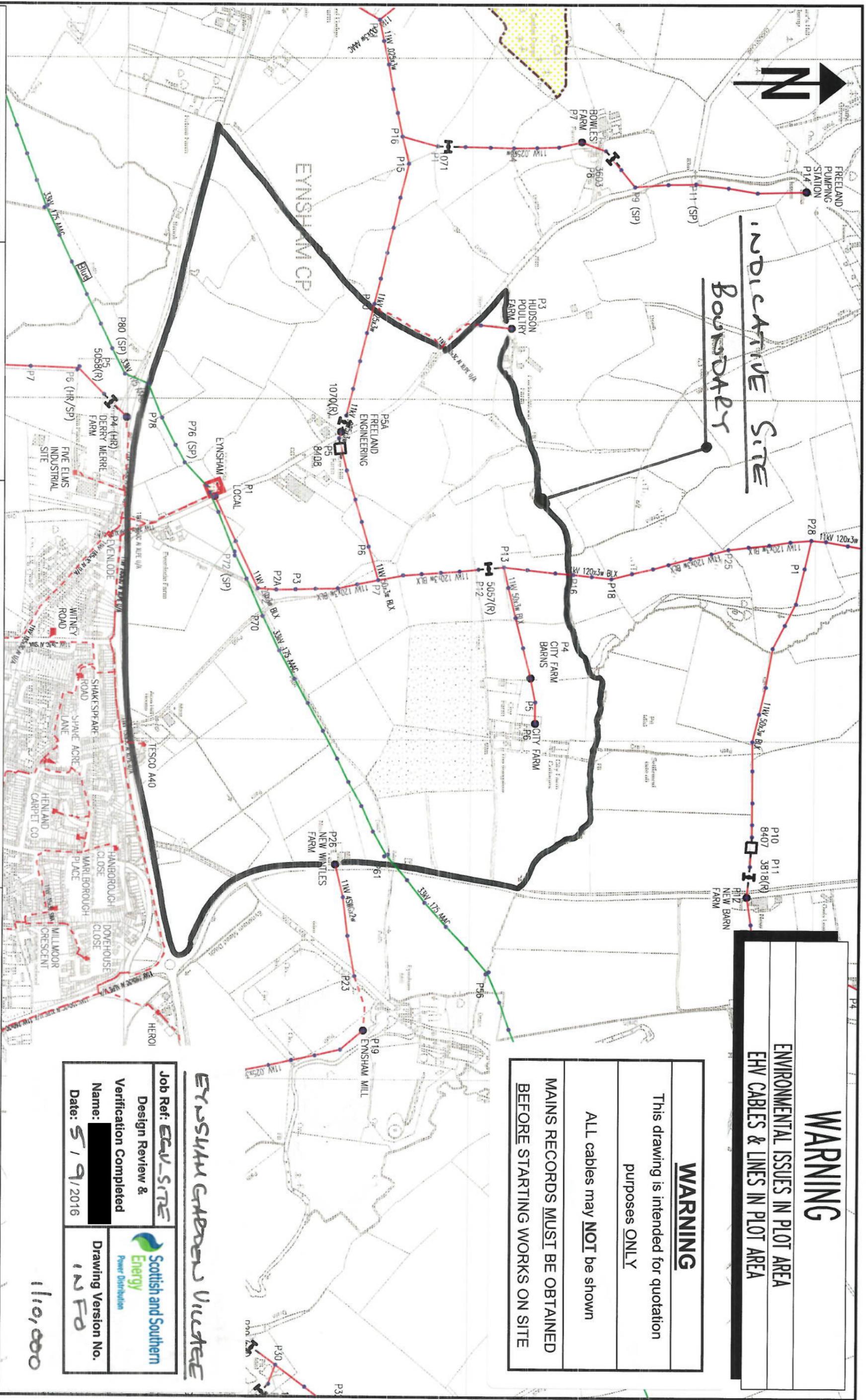
<b>Area</b>	<b>Comments</b>
Eynsham Garden Village	See Note 1

## **NOTES**

- 1) It is anticipated at today that there may be sufficient capacity available to be able to supply this development from our **Eynsham** 33/11kV primary substation and the existing hv distribution network, but will be subject to off-site reinforcement works to the existing hv distribution network.



**INDICATIVE SITE BOUNDARY**



**WARNING**  
ENVIRONMENTAL ISSUES IN PLOT AREA  
EHV CABLES & LINES IN PLOT AREA

**WARNING**  
This drawing is intended for quotation purposes ONLY  
ALL cables may NOT be shown  
MAINS RECORDS MUST BE OBTAINED BEFORE STARTING WORKS ON SITE

NORMAL DEPTH TO THE TOP OF THE CABLE WHEN LAID

services lv. h.v. e.h.v.

0.40m 0.45m 0.60m 0.75m

ROAD CROSSING 0.60m 0.60m 0.75m 0.90m

lv./services - up to 1000V, - over 1000V, to 11,000V, e.h.v. - 22,000V, to 132,000V.

**WARNING**

There may have been subsequent alterations to the surface levels. Trial holes must be taken to determine positions and depths of cables. HS (G) 47 Boulders from the Health and Safety Executive - Avoiding Danger from Buried Cables - should be consulted before commencing excavation work (available from HHSO)

MAIN WORKING IN THE VICINITY OF OVERHEAD LINES THE HEALTH AND SAFETY GUIDANCE NOTE G89 SHOULD BE CONSULTED. (AVAILABLE FROM HHSO)

Based upon the Ordnance Survey map with the sanction of the Controller of H.M. Stationery Office. Crown Copyright Reserved.

The copyright in this drawing is the property of Scottish and Southern Energy plc. No part of this drawing may be reproduced without the prior permission of the copyright owner. Telephone: 01865 200000. Fax: 01865 200001.

Scottish and Southern Energy plc  
Registered in Scotland No. 111110  
200 Dundas Road,  
Glasgow G11 6AA  
Tel: 01865 200000

UNCONTROLLED COPY

Subject to Revision Master held at

H.V. MAINS RECORD  
OXFORD  
01865-845800

Grid Ref: SP42891088

Scale: 1:10000  
Date: 05/09/2016

**Job Ref: EGV-SITE**  
**Design Review & Verification Completed**  
**Name:** [REDACTED]  
**Date:** 5/9/2016

**Scottish and Southern Energy**  
Power Distribution  
**Drawing Version No. INFO**

**EYNSHAM GARDENS VICARAGE**

1:10,000





OFFICE OF THE  
DEPUTY PRIME MINISTER

Chief Planning Officers in England

John Stambollouian  
Head of Development Control Policy  
Office of the Deputy Prime Minister  
4/H2 Eland House  
Bressenden Place  
London SW1E 5DU

Direct line: [REDACTED]

Fax: [REDACTED]

GTN: [REDACTED]

Web site: [www.odpm.gov.uk](http://www.odpm.gov.uk)

Our Ref: PDC 31/2/1

25 November 2002

Dear Colleague

**CIRCULAR 11/95: USE OF NEGATIVE CONDITIONS**

I am writing to draw your attention to the advice in paragraph 40 and the footnote on page 16 of the Annex of Circular 11/95 on The Use of Conditions in Planning Permissions. The advice is on conditions worded in a negative form, prohibiting development until a specified action has been taken.

Following the High Court case *Merritt v SSETR and Mendip District Council* we need to amend the advice in Circular 11/95. Until we are able to amend the Circular, please would you note the following advice when imposing negative planning conditions.

The advice in Circular 11/95 on conditions depending on other's actions (Annex paragraphs 38 and 39), says that it is unreasonable to impose a condition worded in a positive form which developers would be unable to comply with themselves, or which they could comply with only with the consent or authorisation of a third party. Similarly, conditions which require the applicant to obtain an authorisation from another body should not be imposed.

Although it would be *ultra vires* to require works which the developer has no powers to carry out, or which would need the consent or authorisation of a third party, it may be possible to achieve a similar result by a condition worded in a negative form, prohibiting development until a specified action has been taken.

The way the advice is currently worded in paragraph 40 is that such a condition should only be imposed on a planning permission **if there are at least reasonable prospects** of the action in question being performed within the time-limit imposed by the permission.

As a result of the Judgement in *Merritt*, paragraph 40 should be amended to read, "It is the policy of the Secretary of State that such a condition may be imposed on a planning permission. However, when **there are no prospects at all** of the action in question being performed within the time-limit imposed by the permission, negative conditions should not be imposed. In other words, when the interested third party has said that they have no intention of carrying out the action or allowing it to be carried out, conditions prohibiting

development until this specified action has been taken by the third party should not be imposed."

The foot note at the bottom of page 16 should be replaced with: "A policy of refusing permission where there was no reasonable prospect of planning conditions being met could be lawful, but sound planning reasons for the refusal should be given and it should be made clear that this was only a starting point for consideration of cases."

Yours sincerely,

**JOHN STAMBOLLOUIAN**

Draft Letter to Planning Authorities

**Consultation re-proposed major housing/commercial developments**

Planning permission has recently been granted for a number of housing or industrial / commercial developments on land crossed by overhead lines which are owned and operated by Southern Electric Power Distribution (SEPD). SEPD is concerned that insufficient discussion has taken place between SEPD and Planning Authorities concerning the future of these lines prior to the granting of planning permission.

These overhead lines generally afford supplies to other locations beyond the development, even whole towns or parts of cities in some instances and are carried on either steel towers or wood poles. These structures and the overhead conductors they support have been placed in accordance with planning permission in the form of a Section 37 (Electricity Act 1989) consent granted by the Secretary of State. This consent can only be granted following initial consultation with the Local Planning Authority.

For Planning Authorities to not properly consult and to impose conditions such as “the overhead lines are to be removed”, which developers would be unable to comply with themselves would effectively be *ultra vires*. We believe this issue has been previously highlighted in the letter from the Office of the Deputy Prime Minister to the Chief Planning Officers in England dated 25 November 2002. (copy enclosed)

As such, SEPD believes that in these circumstances, the Planning Authority should impose a condition prohibiting development until such time as the developer has reached agreement with the Distribution Network Operator (DNO) (a) as to how the development can be laid out such that the line(s) can be retained in their current position or (b) such that contractual arrangements have been agreed to modify the overhead lines.

It is for Planning Authorities to consider how best to achieve this when land is first being considered for development. For example it may be that Planning Authorities consider imposing conditions on developers requiring them to conclude arrangements for modifying the existing overhead lines before submission of their Planning Application or prior to any planning permission being granted.

I would be pleased to receive any comments you may have and discuss further, (if necessary by meeting with you) how to improve consultation on this important issue.

I look forward to hearing from you.

Yours faithfully

Mark Smith  
Network Operations and Planning Manager



West Oxfordshire District Council  
Woodgreen  
Witney  
OX28 1NB

Name Ralph Seidler  
Department MR Magnet Technology

Telephone  
Fax  
Mobile  
E-mail



Date 17<sup>th</sup> August 2020

To Whom It May Concern

As a provider of innovative healthcare technology, and the largest employer in the Eynsham area, Siemens Healthineers Magnet Technology is pleased to voice its support of the Oxfordshire Cotswolds Garden Village as detailed in the Area Action Plan and public consultation. Siemens Healthineers supports the infrastructure and quality of life improvements the proposed development will bring and believes it can also play a significant part in supporting this project and the local community.

46/01

With increasing demand for its superconducting magnets, Siemens Healthineers as world market leader in magnetic resonance imaging, is looking to further expand its manufacturing capability. As a result, the company is looking for suitable locations, that would house both a new high-quality development and production facility and create additional job opportunities for the local community.

With magnet development and production facilities currently located in Eynsham, Siemens Healthineers would like to extend its contribution to the area as a high-tech and scientific hub. The Garden Village presents a mutually beneficial opportunity; the company is able to expand its mission to manufacture medical equipment that transforms healthcare and the lives of people across the globe, while simultaneously bringing the associated benefits of a local presence to Eynsham's community and economy.

Yours faithfully



Ralph Seidler  
Managing Director  
Siemens Healthcare Limited  
MR Magnet Technology

Siemens Healthcare Limited

Wharf Road, Eynsham, Witney  
Oxford OX29 4BP  
United Kingdom

Phone: +44 (0)1865 880880  
siemens.co.uk/healthineers

Representation received by: Sport England

Dated: 20 Oct 2020

"I welcome the inclusion of Active Design as one of the foundations for good healthy placemaking in the new Garden Village. I would urge WODC to creating/including one of Sport England's Leisure Local Facilities, within the masterplan for the village. The local leisure offer consists of a small pool either 15 x 8m or 20 x 8m, 2 multi-purpose rooms which can become one, changing rooms, foyer and 100m2 fitness studio. It has been designed following best practise and sound business modelling. Other items such as a cafe, climbing wall, soft play offices, meeting rooms can be easily added to the foot print. I have discussed the local leisure concept with Rachel Biles and Janice Bamsey and have forwarded copies of the design to them. Unfortunately, I am unable to attach the document here." - 20 Oct 2020 08:04 (Providing opportunities for healthy active play and leisure)

47/01

"I am concerned with the proposed playing fields arrangements shown and I did raise this in discussion with the promoters of the site. The cricket pitch is stand alone with limited opportunity for secondary spend. We have found this does not work - I refer you to Upper Heyford in Cherwell, where the developers created a cricket pitch at a cost of over £250,000 and who are now having to replace it with open space due to lack of use, BUT having to replace it as part of a sports hub. The football pitches are cramped and will require a high amount of maintenance. It would be better to create a sports hub either with or without a leisure local offer, and make it a destination. Again I have discussed this in the past. What is being advocated is not in our experience sustainable." - 20 Oct 2020 08:13 (Green Infrastructure)

"It is important that the sports facilities are self-financing and this can only be achieved through creating viable and sustainable sports hubs which has a wide offer. Sport England has depth of experience in this and would be happy to work the WODC and the promoters of the site." - 20 Oct 2020 08:17 (Appendix 5 – Summary of Key Infrastructure requirements)

Representation received by: Edward Stuart

Dated: 9 October 2020

Question:2 First Name	Question:3 Last Name	Question:9 To which part of the area action plan does this representation relate?	Question:9 To which part of the area action plan does this representation relate?  Comment	Question:10 Do you consider the AAP to be legally compliant?	Question:11 Do you consider the AAP to be sound?	Question:12 Do you believe the AAP complies with the duty to co-operate?	Question:13 Please give details of why you consider the Area Action Plan is not legally compliant or is...	Question:14 Please set out what modification(s) you consider necessary to make the Area Action Plan legally...	Question:15 If your representation is seeking a modification, do you consider it necessary to participate...
Edward	Stuart	Policy		Yes	Yes	Yes			No, I do not wish to participate at the oral examination.
Edward	Stuart	Policy		Yes	Yes	Yes	Bearing in mind the need for local housing and the need to limit the impact on Witney and West Oxfordshire, I think this scheme is well thought out and creates minimum impact on residents of Eynsham yet maintains good access links to Oxford and London without creating congestion further to the West		No, I do not wish to participate at the oral examination.

48/01

Representation received by: Sue Osborne

Dated: 02 September 2020

AAP Section: Protecting and enhancing environmental assets – ‘At a glance’

"You have completely overlooked that there was a recent DMMO completed which reinstated part of FP 206/10 as a public right of way. Fig.7:1 clearly shows this public footpath, running n/w - s/e adjacent to New Wintles Farm. Fig.7:3 ignores it. Please ensure this right of way is retained. I look forward to your response. Thank you." - Sep 2020 09:09 (Protecting and enhancing environmental assets – ‘At a glance’)

49/01



Sent by email: [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)

[thameswaterplanningpolicy@savills.com](mailto:thameswaterplanningpolicy@savills.com)



0118 9520 500

22 October 2020

## West Oxfordshire District Council – Salt Cross Garden Village Area Action Plan (AAP) – ‘Preferred Options’ Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water Utilities (Thames Water) regarding the above. Thames Water are the statutory water and sewerage undertaker for the Garden Village are, and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have the following comments on the Area Action Plan:

### General Comments

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewage and wastewater treatment infrastructure.

50/01

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “**Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...**”.

Paragraph 28 relates to non-strategic policies and states: “**Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...**”.

Paragraph 26 of the NPPF goes on to state: “**Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...**”.

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that **"Adequate water and wastewater infrastructure is needed to support sustainable development"** (Paragraph: 001, Reference ID: 34-001-20140306).

### New Infrastructure Charging Regime

The way water and wastewater infrastructure will be delivered has changed. From the 1<sup>st</sup> April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The AAP should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

### Paragraph 7.86

Thames Water support the inclusion of text encouraging developers to liaise with them prior to submitting a planning application. In order to strengthen the support text at paragraph 7.86, we request that the following text is incorporated within the AAP:

*"Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.*

*Thames Water encourages developers to use our free pre-planning service (<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>). This service can tell developers at an early stage if we will have capacity in our water and/or wastewater networks to serve their development, or what we'll do if we don't.*

*The developer can then submit this as evidence to support a planning application and we can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes".*

50/01  
cont.

50/02

### **Site Specific Comments**

Please find attached a table which provides site specific comments.

We hope this is of assistance. If you have any questions please do not hesitate to contact Stefania Petrosino on the above number.

Yours sincerely,

**Thames Water Utilities Ltd**

Site ID	Site Name	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase Water	Water Response	Waste Response
53647	Land North Of A40 A40 Section From Bernard Gate To Eynsham Roundabout (Pending)	3408240	39.45	3188	930000	32.29	2657	<p>The scale of development/s in this catchment is likely to require upgrades of both the water supply network and water treatment works. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network and treatment upgrades to accommodate future development/s in this catchment. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>

# The Eynsham Society

Chairman: Eleanor Chance [REDACTED]

Hon. Sec.: Jolyon Cox [REDACTED]

[REDACTED] secretary@eynshamsociety.org.uk

## Salt Cross Garden Village - Area Action Plan Consultation

23<sup>rd</sup> October 2020.

This is the response of the Eynsham Society to the Salt Cross Garden Village Area Action Plan: Pre-Submission Draft Consultation (28 Aug – 23 Oct 2020). **It is not a direct response to the content of the PDF document “Salt\_Cross\_AAP\_presubmission\_August\_2020\_online.pdf”, because that document has proved impossible to download from the WODC website – four different web browsers all report “network error” on an excellent ultrafast broadband connection. We request that this problem be rectified ASAP and the submission deadline extended appropriately.**

51/01

The AAP includes both a 1000-home expansion to the west of Eynsham (in itself an unwelcome 50% increase in the size of the village), and the new Salt Cross settlement (larger than the existing village). We note that between them these two developments will destroy the rural setting of Eynsham: at present, there are views over the A40 to farmland to the north, while on the west it is still possible to walk uninterruptedly into open countryside. Both these amenities will be lost.

We continue to oppose the siting of the “Garden Village” for a number of reasons:

- The original application for Garden Village funding was carefully conducted in secret, with no prior consultation of local residents – even District Councillors were embargoed.
- The true motive for the proposal was to accommodate WODC’s share of Oxford City’s “unmet housing need”, based **on growth figures which have never been substantiated and have since been discredited**. It therefore starts out not as an independent settlement but effectively a dormitory housing estate for Oxford. This is borne out by the insistence on siting it at Eynsham, i.e. as close as possible to Oxford but just outside the Green Belt. Inevitably many of the residents will need to commute to Oxford.
- The site is only a few yards from Eynsham, so that it is difficult to view it as a separate settlement at all – rather, it constitutes more than a doubling in the size of the existing village and is considerably larger in area. **No other village in Oxfordshire has been expected to accept and survive this scale of expansion.**
- This level of development on the A40 corridor is completely unsustainable given the level of congestion encountered at all times of day on the A40, which get steadily worse as more housing is built at Witney and further west. Although now formally detrunked, the A40 still serves as one of the main routes between London, Gloucestershire and Wales. **There should be a complete embargo on major development along the A40 corridor until the transport infrastructure has been improved**, e.g. by creating a new railway line to replace the Winey Branch Line which has short-sightedly been built over.
- **Oxfordshire County Council plans to reduce A40 congestion via a bus lane part of the way to Oxford, together with a Park and Ride at Eynsham, are risibly inadequate.** The “bus

51/01  
cont.

lane to nowhere”, which reaches neither Witney nor Oxford, will do nothing to improve commuter journeys to the major employment sites in south-east Oxford, while a Park and Ride at this site will increase commuter traffic through Eynsham and do nothing to achieve true modal shift. At the very least the proposed dual carriageway extension to Eynsham – which simply moves the congestion point eastwards - should be scrapped and replaced by a bus lane back to Witney. Similarly, links to Hanborough station will not address Oxford commuter needs until the Cowley Branch Line is reopened – and even then there is a real risk that open-market housing will be snapped up instead by London commuters with higher purchasing power.

- However well-intentioned the plans may be, there will inevitably be severe environmental impact on this ecologically sensitive site, and possible flood risk to the A40 and Eynsham.
- The proposal to include local employment provision in the plans is confusing. For a truly independent settlement it would of course be essential, but if the residents of this settlement are employed locally rather than commuting to Oxford it is difficult to see them as part of Oxford’s “unmet housing need”, or to understand why the settlement could not be located a little further away from Oxford on a less sensitive site. There is already underused commercial space in Eynsham’s southern industrial area, largely because of the poor transport links.

51/01  
cont.

To summarise: **both the housing numbers and the choice of site are deeply flawed.**

However, it appears that the plans will go ahead regardless and the following comments assume this.

The general design principles and “green” measures expressed in the consultation document are in themselves unexceptionable and in many cases self-evident, and if they are followed in practice it will no doubt be a pleasant place in which to live as well as an interesting experiment in building a low-emission community. We note with approval that there is not excessive emphasis on car-free development: the COVID-19 pandemic has amply demonstrated that relying solely on public transport (even assuming that everyone can use it, which is not the case) is not realistic. The area is already poorly served by public transport (except from Witney to Oxford city centre), and low-carbon private transport will continue to be essential for many journeys.

51/02

However, **little or no account seems to have been taken of the inevitable effect that so large and close a settlement will have on the existing village.** There is real and well-founded concern that the overall impact on Eynsham will be severely negative and that village resources will be stretched beyond breaking-point unless strong measures to mitigate this are built in from the outset.

In particular:

- **Community facilities such as schools and a medical centre must be up and running before any houses are occupied.** Eynsham’s existing facilities have no spare capacity, and it is not acceptable for Eynsham residents to lose access to their own village facilities because of pressure from a supposedly separate community.
- In the same vein, **new facilities in the Garden Village must supplement those in Eynsham rather than replacing them.** It is not acceptable to re-site schools or the health centre beyond walking distance from central and southern Eynsham.
- Eynsham is an ancient village mentioned in the Anglo-Saxon Chronicle for A.D. 571. **It is essential that it does not become relegated over time to a minor excrescence on the edge of a Greater Eynsham Conurbation centred on the Garden Village site.**
- **Improved bus services along the A40 must not be at the expense of the existing S1 service through Eynsham and Farmoor** – there is a risk that the bus company will want to reduce the S1 service because of the inconvenience of negotiating narrow Eynsham streets and Swinford Toll Bridge. A40 bus stops will be beyond walking range of much of Eynsham (just as the S1 service is beyond easy walking range of north-east Eynsham at present).

- **We do not believe that adequate attention has been paid to flood risk to Eynsham and the A40.** When Eynsham experiences severe flooding (as in 2007), the floodwater comes down from the high ground to the north. However carefully Salt Cross is built, here is bound to be an increase of surface-water runoff from former pasture which delayed the flow and spread it out in time. Hence there is a high risk that building Salt Cross on this environmentally-sensitive site will trigger more frequent flooding in Eynsham and even (as in 2007) on the A40 itself. 51/02 cont.
- If Eynsham is to derive any benefit from the proximity of this large new settlement (and indeed *vice versa*), **provision must be made for local north-south transport links** – residents should not have to drive, and while walking and cycling should be strongly encouraged they are not options for everyone even in fine weather. It is particularly essential that residents of the Garden Village should not drive to Eynsham and park there – the village is desperately short of parking and much of what exists is taken up by bus commuters to Oxford.
- **We do not believe that a pedestrian/cycle underpass would be an adequate north-south connection:** it would be liable to flooding (the A40 is built on a causeway to raise it above the water table, with huge culverts to let water flow underneath). In addition, many people would be nervous of using it after dark when it could be a muggers' paradise. A bridge must be provided instead.
- **Excellent north-south links could be provided by a fleet of small, frequent battery-electric shuttle buses** running through Eynsham, across the A40 to Salt Cross and back again, with suitable recharging points at the ends of the routes. By connecting also with bus services on the A40, these shuttles could obviate the need for a Park and Ride, using the proposed site for a bus hub instead, particularly if the shuttle service were extended to nearby villages with no current bus service. This would provide true modal shift, unlike the proposed Park and Ride – a bus journey which begins with a short (and currently highly-polluting) car journey in no way qualifies.

[ End of document ]

Yours sincerely,

(signed)

Jolyon Cox  
Hon Sec., The Eynsham Society

FOA Joan Desmond  
Planning Policy West Oxfordshire District Council New Yatt Road  
Witney OX28 1PB

## Garden Village Area Action Plan Consultation: Changing language to reflect culture change

I am writing, not only to applaud the culture change towards taking positive Climate Action in person-centred and community-based development that WODC is clearly promoting in the pre-submission AAP, but also to offer small, but significant suggestions, on language use where language unsupportive of the culture change you are working hard on creeps in, I **imagine unintentionally**. I do not want to appear patronising, as I know how hard it is to change our language consistently! I base suggestions on my experience of enabling culture change in health and social care practice, education and research over three decades in the UK and internationally. I focus on the Healthy Place Shaping theme, but the points I make are possibly relevant anywhere in the AAP documents. I offer this feedback in the spirit of helping WODC to take our largely disaffected communities with them in this significant change.

52/01

The AAP has Climate Action at its heart with seven core themes, all of which require massive cultural change in policy, planning, developing, constructing and evaluating, if the policies in each core theme are to be achieved. I assume that this is your intention as you say in Policy 4, Adopting Healthy Place Shaping Principles:

52/02

‘Development at the Garden Village will be required to deliver a high quality, sustainable community where a health-promoting environment is created that enables healthy day-to-day behaviours as the *‘norm’* [my italic] and supports local services, facilities (including green and blue infrastructure) and supports community networks to sustain health, social and cultural wellbeing’. (p. 57)

Your use of the word, ‘norm’ shows up your intention to bring about cultural change and systems change to address our Climate and Ecological Emergency and within that our own health, social and cultural wellbeing. You are explicit about creating conditions that will enable healthy everyday behaviours to become a new ‘norm’. This is great – you are on the right track. It is good to see that this cultural change evident in the kinds of evidence used to support the policies and their core objectives. For example, the language and content of the background justification for the checklist of 10 Healthy Place Shaping Key Principles supports the cultural change to the norm of incorporating activity into daily life by ‘making the active choice the easy choice’ (6.30).

I am sure you are aware that bringing about cultural change or changing ‘norms’ requires changes in beliefs and values which have reciprocal changes in language. Language is a culture bearer which reveals tacitly, how we think about things, what we value and what we believe in. There is powerful evidence of language change in the AAP which shows me that WODC is working actively to change the way planning is done and the changes in behaviour, values and beliefs that it expects from the landowners, developers and builders of Salt

Cross who will use this document when they make their planning applications and then how they develop their sites.

52/02  
cont.

Occasionally and not surprisingly however, as I say above, there are places where the language slips back perhaps into old ways of thinking/valuing. This is only human and I point them out here as exemplars, in the context of what I have said above.

In relation to Natural Capital theory (5.21), whilst the theory contains appropriate concepts to address climate resilience and adaptation, the terminology of this theory conveys the old norm that our natural world provides us humans with 'services'. This notion of 'services' is based on values and beliefs that the planet is ours and everything on it, is here just for us to 'exploit' (p.39) only for our own health and well-being. It does not fit with new (indigenous!) norm underpinning Climate Action to develop Salt Cross in harmony with Nature for the mutual benefit and very survival of people, wildlife and a planet that supports life.

Another example, is in Figure 6.1.1 'Checklist of 10 Healthy Place Shaping Key Principles at Salt Cross'. In this admirable principle, the word, 'could' has been used instead of 'should', in the following sentence, 'To create a sense of belonging, an important tool *could* be the adoption of a community development strategy which contains actions to encourage community cohesion ...'. The word 'could' in this and in other places throughout the AAP, as pointed out in the EPIC/GreenTEA response, gives developers an opportunity to wriggle out of doing the right thing (usually for financial reasons) in realising, in this case, the vision of community cohesion. If the wording was changed to 'should', the statement signals that it is genuinely part of Policy 4, a component that must be adhered to. And it still leaves plenty of room for a range of community development strategies to be considered by those concerned.

In EPIC's response to the 2019 consultation to the WODC Preferred Options document for the Garden Village, it was noted that using the term, 'the elderly', is disrespectful and non-person-centred. The term 'older people' was suggested for future iterations. It seems as if that suggestion was heard as it appears elsewhere in the AAP, but in the Check list of 10 Healthy Place Shaping Key Principles at Salt Cross (Figure 6.1.4) (which is to be used explicitly in Policy 4), the term is being used again. 'All age groups' is sufficient and is more inclusive in tone. Such changes in language at this early stage will support health, social and cultural enrichment and well-being in the future development. Also concerning inclusivity and avoiding discrimination, active travel of people who use mobility vehicles needs to be considered (in Figure 6.1.4), as stipulated in the Eynsham Neighbourhood Plan. Being out and about independently to interact with others and nature enables people with mobility difficulties to be more active too.

52/02  
cont.

The next example regards community partnership and using language that can be taken as disempowering, rather than empowering communities:

It is for the new users of Salt Cross to determine the specific focus of their 'strategies' but a community development officer can empower and support them in shaping their community and neighbourhoods (6.22).

When a person with authority says, “I will empower you”, they actually take people’s power away! So 6.22, could be changed to: ‘ It is for the new users of Salt Cross to determine the specific focus of their ‘strategies’ but a community development officer can **help people** empower **themselves** and support them in shaping their community and neighbourhoods **as they see fit.**’

This point is also relevant to the wording about the community development officer of Policy 5 (p.61; para 4).

Language changes such as these may seem unnecessarily pedantic and small, but the cultural change they will start to bring about in the development world is potentially huge!

Dr Angie Titchen

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **Response: Consultation on the pre-application submission for the Salt Cross Garden Village Area Action**

The Trust for Oxfordshire's Environment (TOE) supports the policy position to require a 25% biodiversity net gain for the Garden Village.

The pre-application submission for the Salt Cross Garden Village has thoroughly and thoughtfully considered the impact on biodiversity. This is reassuring given the prevailing backdrop of continuing biodiversity losses and continual pressure for housing development across Oxfordshire. Currently the land is a fairly rich mosaic of various habitats with some areas having high biodiversity value, and there are many opportunities to protect and enhance these in the designs for the village development.

53/01

The overarching ambition of the Defra 25 Year Environment Plan is to 'leave our environment in a better state than we found it and to pass on to the next generation a natural environment protected and enhanced for the future' (A Green Future: Our 25 Year Plan to Improve the Environment. Defra 2018) For this ambition to materialise in reality, it is essential for all development to deliver a biodiversity net gain. The Environment Bill is expected to require all developments to result in a 10% net gain for biodiversity. Oxfordshire's Biodiversity Advisory Group and the Oxfordshire Environment Board proposes that all development (such as Salt Cross) in the Recovery zone of the Nature Recovery Network is required to deliver 20% biodiversity net gain. It is believed by these two groupings of environmental organisations that the 10% requirement falls short of what is required to make a significant contribution to enhancing biodiversity in Oxfordshire, bearing in mind the scale of past and ongoing loss.

Within the vision for the Garden Village there is the expectation that the plans should be ambitious "[Salt Cross] will be known for its emphasis on the environment, quality and innovation and will tackle the challenges presented by climate change 'head-on' adopting a zero-carbon and natural capital based approach providing a model example of how to plan a new community for the 21st century in a logical, organic and sustainable way. The perfect setting for wildlife and people to flourish together."

With a target of 25% biodiversity net gain underpinning this vision there is a real possibility for the Garden Village to be a national (and international) exemplar for how forward thinking design can enable biodiversity to be enhanced and to thrive while meeting local demand for housing and infrastructure. TOE believes that where the biodiversity net gain requirements can not be met on site, the District Council should ensure sufficient off-site biodiversity net gain is secured to ensure the Garden Village development makes an appropriate contribution towards nature's recovery in the district.

53/01  
cont.

TOE would also like to impress upon the District Council the requirement for a long term biodiversity gain. Biodiversity net gain requires the gain to be created and managed for a period of at least 30 years. It is the ambition of TOE, along with that of the Biodiversity Advisory Group and the Oxfordshire Environment Board, that biodiversity net gain (on-site and off-site) is delivered in perpetuity. The impact of development is forever, and net gain provision should operate on the same premise. TOE works with partners and landowners to deliver gains which will be there for the long term. It is our intention to ensure that

biodiversity net gain is not simply used as a mechanism for delaying the loss of biodiversity for 30 years. TOE would like to recommend to the District Council that an ambition of securing the required biodiversity gain in perpetuity is also embraced.

Lynn Parker  
Programme Manager  
Trust for Oxfordshire's Environment

23<sup>rd</sup> October 2020



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

Name of the Document to which  
this representation relates:

Salt Cross Garden Village Area Action Plan

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

**By Post:** Planning Policy,  
West Oxfordshire District Council,  
Elmfield,  
New Yatt Road,  
Witney,  
Oxon.  
OX28 1PB

**Or by Email:** [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)

This form has two parts-

**PART A – Personal Details**

**PART B – Your Representation(s).**

Please fill in a separate sheet for each representation you wish to make

## PART A

### 1. Personal Details

### 2. Agent's Details (If applicable)

Title	Mr	Mr
First Name	David	Stephen
Last Name	Carrington	Pickles
Job Title		Policy Planner
Organisation		West Waddy
Address Line 1		The Malthouse
Line 2		60 East St Helen Street
Line 3		Abingdon
Line 4		Oxon
Post Code		OX14 5EB
Telephone Number		
Email Address		



# Salt Cross Garden Village Area Action Plan

REF:  
  
(For Official Use Only)

## Publication Stage Representation Form

### PART B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input type="text" value="1.4"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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4. Do you consider the Area Action Plan is:

4. (1) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4. (2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 1.4 states that 'the AAP has been prepared with extensive community and stakeholder engagement....'

This is not true with regard to the land owned by David Carrington, which is at the heart of the proposed Garden Village, but who has not been consulted by the council or contacted at all during the preparation of the AAP. This conflicts with the Council's adopted Statement of Community Involvement which states in paragraph 3.22 that it will seek to engage with developers and landowners in the preparation of planning policy documents: 'As these groups are often critical to delivery of policies and proposals, they have an important part to play....'

Paragraph 35 of the National Planning Policy Framework states that one of the tests of a plan being 'sound' is that it is 'effective', that is 'deliverable over the plan period'. The omission of all consultation/liaison with the landowner of a key area covered by the AAP prior to the publication of the proposed submission version means that the plan as it relates to his land is undeliverable as he objects to the identified uses for his land as detailed in the other representations submitted on the AAP.



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

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6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There needs to be consultation with David Carrington to discuss the proposed uses relating to his land and where access would be provided; how it relates to adjoining development areas; and the potential for it to assist with transport improvements to the A40 corridor, in order to comply with the council's Statement of Community Involvement.

As the site contains Woodstock Car Sales and Kingsley Cars it partly consists of previously developed land, and the proposals should therefore include development and not simply green infrastructure, in order to accord with the advice in paragraph 117 of the NPPF.

54/01  
cont.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

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7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

David Carrington owns a key site covered by the Salt Cross Garden Village AAP, and therefore it is of critical importance to him that he is present and/or represented at discussions about the future use of his land.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Stephen Pickles

Date

22.10.20



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This form has two parts-

**PART A – Personal Details**

**PART B – Your Representation(s).**

Please fill in a separate sheet for each representation you wish to make

### PART A

#### 1. Personal Details

#### 2. Agent's Details (If applicable)

Title	Mr	Mr
First Name	David	Stephen
Last Name	Carrington	Pickles
Job Title		Policy Planner
Organisation		West Waddy
Address Line 1		The Malthouse
Line 2		60 East St Helen Street
Line 3		Abingdon
Line 4		Oxon
Post Code		OX14 5EB
Telephone Number		
Email Address		



# Salt Cross Garden Village Area Action Plan

## Publication Stage Representation Form

REF:

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### **PART B – Please use a separate sheet for each representation**

Name or Organisation:

#### 3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="7"/>	Policies Map	<input type="text" value="Figures 6.3;&lt;br/&gt;7.3 &amp; 7.5"/>
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#### 4. Do you consider the Area Action Plan is:

- |  |     |                          |    |                                     |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant                       | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4. (2) Sound                                   | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the<br>Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached statement relating to Green Infrastructure.

54/02



## Salt Cross Garden Village Area Action Plan

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6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The AAP must consider the land owned by David Carrington in a holistic way as part of the overall masterplan for the site in accordance with Garden City principles. David Carrington considers that his land is most suitable for housing as it is in a sustainable location at the heart of the Garden Village, close to the proposed services and facilities, and this would enable pedestrian/cycle and bus improvements to be provided delivering significant planning gain as detailed in David Carrington's representations relating to the Framework Plan. This would be an 'effective' and 'justified' use for the site whilst also according with national policy that prioritises the use of previously developed land.

54/02

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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## Salt Cross Garden Village Area Action Plan

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**No**, I do not wish to participate in hearing session(s)

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Stephen Pickles

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**PART B – Your Representation(s).**

Please fill in a separate sheet for each representation you wish to make

### PART A

#### 1. Personal Details

#### 2. Agent's Details (If applicable)

Title	Mr	Mr
First Name	David	Stephen
Last Name	Carrington	Pickles
Job Title		Policy Planner
Organisation		West Waddy
Address Line 1		The Malthouse
Line 2		60 East St Helen Street
Line 3		Abingdon
Line 4		Oxon
Post Code		OX14 5EB
Telephone Number		
Email Address		



# Salt Cross Garden Village Area Action Plan

## Publication Stage Representation Form

REF:

(For Official Use Only)

### PART B – Please use a separate sheet for each representation

Name or Organisation:

#### 3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="28"/>	Policies Map	<input type="text" value="Figure 11.6"/>
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#### 4. Do you consider the Area Action Plan is:

- |  |     |                          |    |                                     |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant                       | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4. (2) Sound                                   | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the<br>Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached sheet

54/06  
54/07



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

An amendment to Figure 11.6 to incorporate David Carrington's land within the areas proposed for 'genuinely affordable, mixed tenure, beautiful & imaginately designed zero carbon and energy positive homes with gardens; including opportunities to grow food,' because it is currently a partially previously developed site which should be prioritised for development in accordance with the NPPF. It also currently contains a large area of surface car parking associated with the existing businesses which will not create an attractive entrance into the new Garden Village, where the new crossing over the A40 is proposed from the existing village of Eynsham.

54/06  
54/07

For further justification please see the response to question 5.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

David Carrington owns a key site covered by the Salt Cross Garden Village AAP, and therefore it is of critical importance to him that he is present and/or represented at discussions about the future use of his land.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Stephen Pickles

Date

22.10.20



# Salt Cross Garden Village Area Action Plan

## Publication Stage Representation Form

REF:

(For Official Use Only)

Name of the Document to which  
this representation relates:

Salt Cross Garden Village Area Action Plan

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

**By Post:** Planning Policy,  
West Oxfordshire District Council,  
Elmfield,  
New Yatt Road,  
Witney,  
Oxon.  
OX28 1PB

**Or by Email:** [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)

This form has two parts-

**PART A – Personal Details**

**PART B – Your Representation(s).**

Please fill in a separate sheet for each representation you wish to make

### PART A

#### 1. Personal Details

#### 2. Agent's Details (If applicable)

Title	Mr	Mr
First Name	David	Stephen
Last Name	Carrington	Pickles
Job Title		Policy Planner
Organisation		West Waddy
Address Line 1		The Malthouse
Line 2		60 East St Helen Street
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Line 4		Oxon
Post Code		OX14 5EB
Telephone Number		
Email Address		



# Salt Cross Garden Village Area Action Plan

## Publication Stage Representation Form

REF:

(For Official Use Only)

### PART B – Please use a separate sheet for each representation

Name or Organisation:

#### 3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input type="text" value="8.20;8.55 -&lt;br/&gt;8.62"/>	Policy	<input type="text" value="14; 15; 17"/>	Policies Map	<input type="text"/>
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54/08  
54/09  
54/10  
54/11  
54/12

#### 4. Do you consider the Area Action Plan is:

- |  |     |                          |    |                                     |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant                       | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4. (2) Sound                                   | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the<br>Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached sheet on connectivity for the response to question 5.



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The only way of rectifying the 'soundness' issues identified under question 5 is for the Council to identify how access will be provided into David Carrington's land and what land requirements are envisaged for the proposed improvements to the A40 and the proposed crossing from Eynsham.

This would address the soundness issues as it would avoid sterilising this land, and enable this key site, which has real importance as a Gateway into the Garden Village, to be developed, while simultaneously delivering the connectivity improvements identified for this location in the Salt Cross Garden Village Area Action Plan.

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**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**



## Salt Cross Garden Village Area Action Plan

### Publication Stage Representation Form

REF:

(For Official Use Only)

7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

David Carrington owns a key site covered by the Salt Cross Garden Village AAP, and therefore it is of critical importance to him that he is present and/or represented at discussions about the future use of his land.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Stephen Pickles

Date

22.10.20

**Representations on behalf of David Carrington on the Salt Cross Garden Village Area  
Action Plan in relation to Green Infrastructure: Policy 7 & Figures 6.3; 7.3 & 7.5**

**5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

David Carrington's land is identified on the attached Land Registry plan and is currently occupied by Woodstock Car Sales and Kingsley Cars as well as an undeveloped field to the rear. Figure 6.3 shows David Carrington's land as having been identified largely, with the possible exception of the Woodstock Car Sales at the front of the site, for Green Infrastructure, including a 'green corridor'; 'woodland planting'; and 'amenity grassland.' This is despite the site being partly previously developed land, as it contains Woodstock Car Sales and Kingsley Cars. The National Planning Policy Framework states in paragraph 117 that: *'Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or "brownfield" land.'* Previously developed land should therefore be used in preference to greenfield land, so the failure to allocate this land for development, while allocating large areas of greenfield land for development on the remainder of the area covered by the AAP is a clear breach of national policy and therefore unsound.

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54/04  
54/05

At a meeting with the Council on 23<sup>rd</sup> September 2020 we discussed this issue with officers who stated that it did not matter that David Carrington's land was allocated for green infrastructure as there is an equalisation agreement between the landowners. However, Savills have informed David Carrington, that Grosvenor Developments Ltd, who are the developers promoting the remainder of the site for development, are not willing to allow him to join the consortium as they consider that they already have enough land for all of the uses proposed, including Green Infrastructure and so have no need of his land. The likely implications of this are that the land owned by David Carrington would be sterilised as no access would be provided from within the Garden Village and it would therefore remain in its current condition, at a key entrance point, where a crossing from Eynsham is proposed, as indicated on the Illustrative Spatial Framework Plan (Figure 11.6). This would represent a fundamental departure from the Garden City Principles on which the Garden Village is to be constructed. Garden City Principles as set out in Figure 2.3 in the AAP involve *'a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities,'* rather than the piecemeal approach being taken to David Carrington's land.

David Carrington wants his land to form part of the Garden Village and to be planned for in an holistic manner along with the rest of the site, but the absence of consultation by the Council (as detailed in the separate objection on the Statement of Community Involvement), which has resulted in the AAP proposals being developed without consideration to the particular characteristics and opportunities of this previously developed land, mean that there is a danger that the site will not be incorporated within the Garden Village. As a result, its current functional appearance with large areas of parked cars could continue. A singularly incongruous entrance to a proposed zero carbon development.

The Green Infrastructure proposals do not meet the soundness test of being 'justified,' as it is not '*an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*' It also means that the Green Infrastructure proposals shown on Figure 6.3 would be undeliverable over the plan period as the landowner has no commercial incentive to provide them, so that these proposals are also not 'effective.' As they also conflict with the NPPF's requirement to make as much use as possible of previously developed land, the proposal is also inconsistent with national policy. Figure 6.3 as it stands is therefore inconsistent with three soundness tests.

**Representations on behalf of David Carrington on the Salt Cross Garden Village Area  
Action Plan in relation to the Spatial Framework Plan (Figure 11.6) & policy 28: Land Uses  
& Layout – The Spatial Framework**

**5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

David Carrington's land is identified on the attached Land Registry plan and is currently occupied by Woodstock Car Sales and Kingsley Cars as well as an undeveloped field to the rear. In terms of the Garden Village, the site is of key importance as it immediately adjoins the A40 and therefore has a large public presence in terms of first impressions of the Garden Village, especially as it adjoins a key crossing from Eynsham and therefore large numbers of pedestrians and cyclists travelling to and from the new settlement will go straight past it. At the moment, it contains Woodstock Car Sales and Kingsley Cars, which contain a large number of parked cars, which would detract from the entrance to the Garden Village.

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54/07

At present, Figure 11.6 shows the land as being largely green where no development is proposed but adjoined by 'active travel networks: walking, cycling, & public transport,' on all four sides of the site, which reinforces the point made above that it will be passed by large numbers of people moving both between different areas of the Garden Village as well as from outside of it. While it is noted that Figure 11.6 is described as an 'Illustrative Spatial Framework Plan,' the fact that it is included in the AAP means that it will be afforded considerable weight in determining subsequent planning applications. The Council state on page 7 of the AAP that: *'The framework plan is a culmination of community and stakeholder engagement and technical evidence undertaken since 2018.'* However, this has not involved liaising with David Carrington, despite him being a key landowner on the site.

The absence of development on most if not all of our client's land is therefore of concern as the site is already providing a commercial return from Woodstock Car Sales and Kingsley Cars motor dealerships and the landowner has therefore no incentive to provide land for Green Infrastructure if there is no return for this use. The site is, also eminently suitable for development as it is partially previously developed land. The National Planning Policy Framework states in paragraph 117 that: *'Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or "brownfield" land,'* so the failure to allocate this land for development, while allocating large areas of greenfield land for development on the remainder of the area covered by the AAP, is a clear breach of national policy and therefore unsound.

The adjoining land immediately to the east is shown on Figure 11.6 to be allocated for *'Genuinely affordable, mixed tenure, beautiful & imaginatively designed zero carbon & energy positive homes with gardens; including opportunities to grow food.'* Given the location of David Carrington's land at a key entrance to the site, close to the Lowland Hub, the planned Village Centre and School sites and its partially previously developed status, it is considered that this use should be extended to include the land north of the garage on Figure 11.6. The housing is shown as extending closer to the A40 than development on David Carrington's land

would require and so development in this location is clearly judged by the Council to be acceptable in principle in environmental terms.

There are also no environmental constraints relating to this area of land as it is not within the areas identified as being of biodiversity interest such as the areas identified for wildlife sanctuaries; is not close to the listed buildings at City Farm or the former medieval village at Tilgarsley and is well screened and so would not impinge on the panoramic views.

Without housing the area is likely to be left dominated by parked cars, which is particularly out of character with a Garden City built on the principle of promoting sustainable travel and a zero carbon economy.

David Carrington wants his land to form part of the Garden Village and to be planned for in an holistic manner along with the rest of the site, but the absence of consultation by the Council (as detailed in the separate objection on the Statement of Community Involvement), which has resulted in the proposals being developed without consideration as to the particular characteristics and opportunities of this previously developed land, mean that there is a danger that the site will not be incorporated within the Garden Village. As a result, its current functional appearance with large areas of parked cars would continue.

This does not meet the soundness test of being 'justified,' as it is not 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence,' and also means that the Illustrative Spatial Framework Plan shown on Figure 11.6 would be undeliverable over the plan period so that these proposals are also not 'effective.' As they also conflict with the NPPF's requirement to make as much use as possible of previously developed land, the proposal is also inconsistent with national policy. Figure 11.6 as it stands is therefore inconsistent with three soundness tests.

**Representations on behalf of David Carrington on the Salt Cross Garden Village Area Action Plan in relation to connectivity (paragraphs 8.20; 8.55 – 8.62 & policies 14; 15; & 17)**

**5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible**

The proposals to carry out corridor improvements to the A40 are strongly supported. These include a number of improvements in the vicinity of the land owned by David Carrington which adjoins the Esso petrol station on the A40, and is identified on the attached land registry plan. The improvements as detailed in Policy 14 include a new signalised crossing near Spareacre Lane, which would provide a direct connection across the A40 to the bridleway adjoining David Carrington's land; improving provision for pedestrians and cyclists by carrying out junction reconfiguration and improvements at the Esso petrol station entry and egress; and upgrading shared-use footways and cycleways along the A40. Policy 15 also specifies that the improvements will include the provision of eastbound bus lanes between Eynsham Park and Ride and Wolvercote roundabout; while policy 17 specifies that: *'Planning applications for built development must be accompanied by details of how proposed development will help facilitate the delivery of transport improvements and mitigation measures.'* Figure 8.1 also states that: *'There will be significantly increased demand for people to travel safely and seamlessly between Salt Cross, existing Eynsham Village and the proposed West Eynsham Strategic Development Area, by walking, cycling and riding. The provision of safe and effective connections for pedestrians, cyclists and other non-motorised movements across the A40 at Eynsham will be essential.'*

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David Carrington's land has the potential to facilitate these improvements, given that it includes land either side of the Esso Petrol station as shown on the land ownership plan accompanying these representations, but the deliverability of these potential improvements is questionable given that no discussions have yet taken place about them with either West Oxfordshire District Council or Oxfordshire County Council as highway authority. There is therefore no evidence to demonstrate either that maximum advantage will be taken of the opportunity for improvements or that they would be deliverable. The safest route for cyclists and pedestrians along the A40 could, for example, potentially be to the rear of the Esso petrol station so that they would not have to cross the path of vehicles entering and leaving the station. Other improvements could involve the provision of longer slip roads into and out of the garage, so that cars can more safely enter and leave the petrol station and avoid creating queues on the A40, while simultaneously also providing the new bus lane. However, with the site's current configuration, particularly with the Woodstock Car sales on the site frontage, this would be likely to affect the businesses currently located there. Relocation of these businesses would therefore likely be required to deliver the improvements. It is therefore essential that proper liaison takes place prior to the submission of the Salt Cross Garden Village AAP, in order to ensure that there is a deliverable solution available.

Another significant issue with regard to David Carrington's land relates to the potential to provide access to their land in order to enable it to be developed as part of the Garden Village. There is currently an entry and separate exit access from the A40, but with the proposed A40 improvements outlined above there could be a Council aspiration to close these accesses. Paragraph 8.59 of the AAP also states that junctions providing access to development sites along the A40 additional to the Western Development Roundabout and the Park and Ride access must be avoided. This is reiterated in Policy 17.

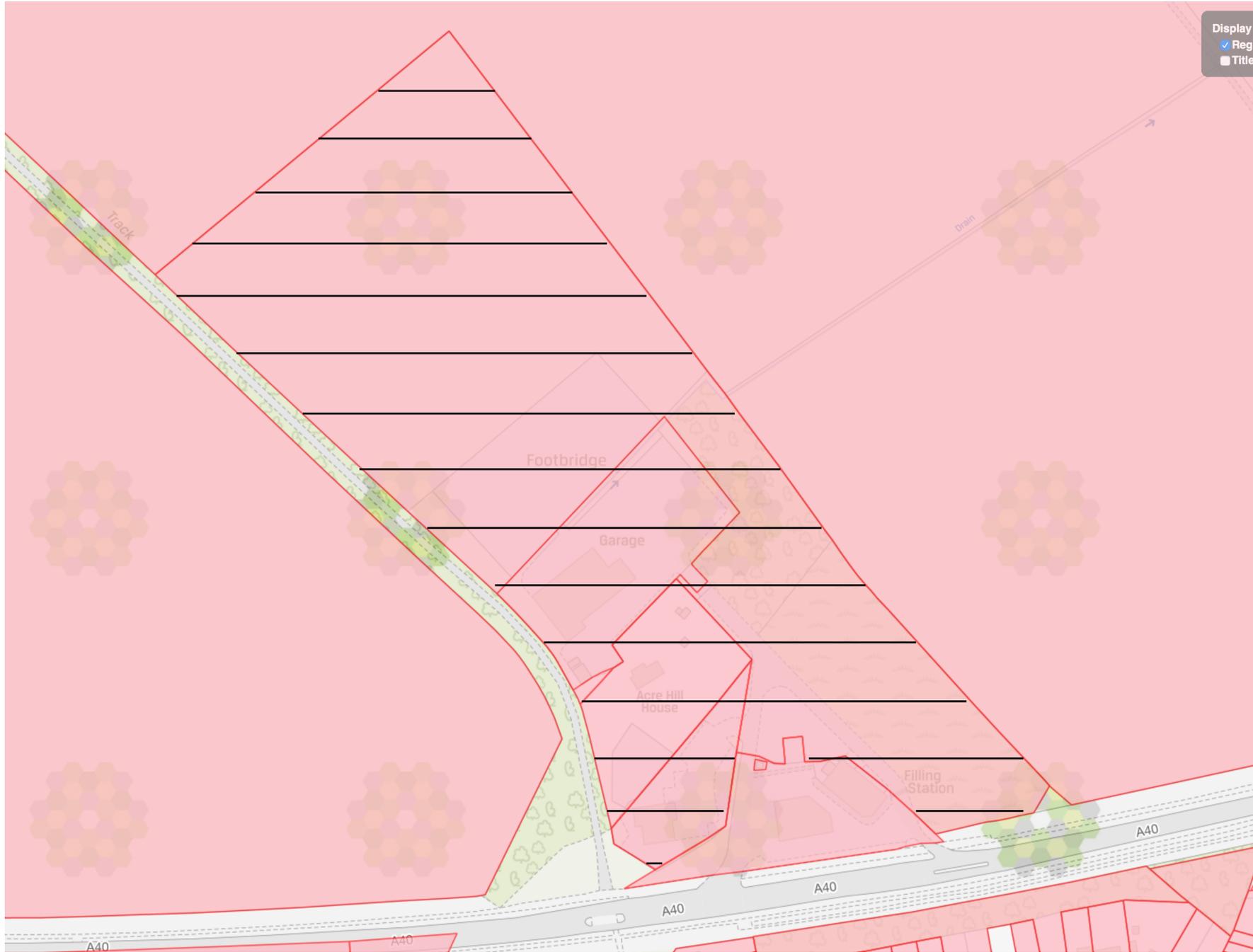
This therefore means that David Carrington's land could potentially have no access for Garden Village development, whether this is residential; commercial or community use. This concern is accentuated by the outline planning application for the site (ref: 20/01734/OUT), which excludes David Carrington's land and makes no provision for access to it as shown on the masterplan drawing OGV-DWG-ILL-IMP-01 and the movement drawing plan OGV-DWG-APPR-PP3-01.

The AAP is therefore unsound as it does not demonstrate how access would be provided to a key site adjoining the A40 at the heart of the Garden Village; nor how it could facilitate the proposed crossing of the A40 at Spareacre Lane or the pedestrian, cycle or bus improvements proposed for the A40 corridor.

The AAP is therefore in terms of connectivity and policies 14, 15 & 17 not 'effective' as it cannot be demonstrated that the improvements are deliverable over the plan period; the proposals are also not 'justified' as it has not been demonstrated that vehicular access will be provided to serve David Carrington's land from within the Garden Village, potentially sterilising this land, and preventing this key site, which has real importance as a Gateway into the Garden Village, from being developed. This is not an appropriate strategy, especially as David Carrington is requesting that his land is allocated for housing in his representations on the Illustrative Spatial Framework Plan (Figure 11.6). The NPPF also states that '*transport issues should be considered from the earliest stages of plan-making*,' (para 102), so it is imperative that these issues are addressed prior to the submission of the Salt Cross Garden Village AAP.

In terms of soundness therefore the connectivity proposals in relation to David Carrington's land fail the 'effective' and 'justified' tests and are also potentially not consistent with national policy.

**Carrington land north of the A40 at Acre Hill, Eynsham, which is surrounded by the proposed development at Salt Cross Garden Village**







*Images of the site frontage onto the north side of the A40*



Dr Angela Wilson and Dr Stéphane Paulus, [REDACTED]
15 <sup>th</sup> October 2020

## Response to **Salt Cross Garden Village Area Action Plan: Pre-Submission Draft Consultation**

### The background to the development:

We are in the midst of a Climate and Ecological Crisis and a pandemic. Work and living practices have changed dramatically in the last 6 months and will continue to evolve.

As medical doctors we know that humans need good planetary health to thrive. This means that we need to stabilise the climate as well as have healthy, safe spaces to live and work in. We need to become resilient and locally more self-sufficient to cope with the increasingly erratic weather we will face in the years ahead.

The vast building projects the UK government proposes on green field sites are unjustifiable without a reassessment of what will actually be needed post Covid and in light of the few years we have left to significantly reduce emissions.

55/01

Squeezing in as much building work as possible in the next few years in order to then stop building and claim we are have now reduced emissions as a country is not appropriate or fair. We have a limited carbon budget left to use. Any work carried out should be done in the least carbon intensive way possible and scaled down to reflect the fact that western countries like the UK have not been fairly using the world's resources.

Plans for the Salt Cross development happened prior to 2 emergencies being declared. A rethink and assessment of the actual need for this project should be carried out in the light of these events and changes.

I have read a significant number of the documents you have provided and discussed the development with many people who have had the chance to analyse them in more depth.

Please see the next page for my concerns/comments.

## Concerns regarding Salt Cross Garden Village's development

1. The current plans for Salt Cross will lead to loss of high-quality agricultural land and green field sites. Food security for the population of West Oxfordshire should be a priority for central and local government. Losing more land to construction, even if local growing schemes within the new development are established is not logical. Remaining land around the development should be assessed and farmers encouraged to rent out land for Community Supported Agriculture projects so that residents can have healthy food grown close to their homes. This will help reconnect them with nature, which is proven to have positive health impacts.
2. The whole construction of the site will be carbon intensive. Even though the houses should be net zero builds, the overall environmental footprint of Salt Cross will eat into the UK's residual carbon budget. How do WODC and Grosvenor intend to offset this carbon use? 55/02
3. The UK government and local planners have gone ahead with planning this development despite the opposition of local residents. They are intent on developing the Oxford- Cambridge -London triangle, even if it is at the expense of the mental and physical health of the local residents and to the detriment of nature in these areas. How do the developers and council plan on protecting residents' health during the long construction phase? Even if a construction traffic consultation is approved, the noise and air pollution in the surrounding areas will be significant.
4. The increased traffic through Hanborough as a result of the finished development is potentially going to be significant. The village will not benefit from having the new facilities close enough to use regularly. It would seem appropriate for Hanborough council to be given a financial package to offset from the detrimental effects of the development. How do Grosvenor plan on providing this? 55/03
5. The only clear benefit that has been currently planned for Hanborough is a cycle path that will reach down to the north side of the development from the railway station. The current proposals are inadequate. The route needs to be safe, wide enough and lit sustainably. Provision should be made within Salt Cross for electric bicycle charging points and good cycle storage.
6. There one again appears to be a thread running through the document that is not just the 'golden thread' of climate change but the mantra that in a countryside setting, cars are essential means of transportation. West Oxfordshire is increasingly becoming a suburb of Oxford and even London. The density of the population means that the transport network should and could be adequate to make car ownership the exception and not the norm.

7. The current definition of affordable housing is going to mean that many local people can still not afford the new builds. Given the size of the development and profits likely to be made on this scale, what extra incentives will Grosvenor provide to local people who cannot afford the housing that will be built there? 55/04
  
8. In 2008 the then government's housing plans would have led to net zero housing being built from 2016 onwards. There is no reason why this standard of sustainable housing should not be built at Salt Cross. Constant monitoring of the builds during construction can make sure that they are done to high standards. Look to Germany and The Netherlands for examples of large scale developments so that the UK can genuinely claim to join them as world leaders in the clean energy transition in housing. 55/05
  
9. Widening any road during a climate emergency and when much work is now being done online is a waste of resources. Further widening of the A40 should be cancelled while active travel encouraged further. Construction of a light railway heading westwards from oxford should be considered.

I am aware that there are a number of other documents that will be sent to you as part of the consultation process which look at how nature will be protected in the area. I have not included comments about this here but would ask that you follow the advice of EPIC and GreenTEA, many of who have personal expertise in the topics that they have commented on.

At the heart of all decisions please put the needs of local people before the profit of the construction companies involved. Stakeholder primacy needs to take over from shareholder primacy. Salt Cross could then truly be a world leader in development - Sustainability and equitability built into all areas of development.



WOT

Witney Oxford Transport

[www.witneyoxfordtransport.org.uk](http://www.witneyoxfordtransport.org.uk)

## Salt Cross Garden Village Area Action Plan Publication Stage Representation

The document to which this representation relates is the pre-submission draft  
Area Action Plan.

Presented by: Maurizio Fantato, Chairman, WOT - Witney Oxford Transport  
Reg address: [REDACTED]  
Email: [info@witneyoxfordtransport.org.uk](mailto:info@witneyoxfordtransport.org.uk)  
Tel: [REDACTED]

22 October 2020

**Section 3:** Representation made by Witney Oxford Transport on: POLICY

**Section 4:** We accept the plan is legal, and complies with the duty to cooperate. However we do not believe it to be sound, for the reasons stated in our submission hereinafter.

56/01

**Section 5:** *Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to cooperate, please also use this box to set out your comments*

**These comments relate to the unsound nature of Policy 15** in its reliance on a road-only solution to travel problems on the A40 corridor. The wording of the bullet points needs adding to, in brief, as we set out below. This is to allow for rail to be recognised as an option for further consideration as part of the A40 Corridor Improvements.

56/02



**WOT**

Witney Oxford Transport

[www.witneyoxfordtransport.org.uk](http://www.witneyoxfordtransport.org.uk)

The reasoning for this includes:

1) **It is settled policy in OCC Connecting Oxfordshire Volume 3 Rail strategy** that

“The county council will retain the option of a rail line to Witney as a longer-term aspiration in its A40 Strategy, and will pursue opportunities to realise the aspiration with Network Rail and train operators in the future”.

**By ignoring the rail option and only supporting the road option the AAP is undermining this strategy. It is not sound for an AAP to undermine a strategic policy in a way which could put a cap on further housing and other developments along this corridor.**

2) **The AAP is unsound in so far as it declares that this will be a “zero-carbon” development.**

AAP s. 5.42 reads: “The Garden Village is an exemplar net-zero carbon, energy positive development which meets the challenges of climate change head-on.”

No car-based development could be carbon-free in the foreseeable future as road vehicles will still be using fossil fuels long after 2040 - the year that fossil-fuel vehicle sales should end (or 2030 if a more ambitious target is set).

**To help meet its own carbon-free commitment and national carbon reduction policy obligations the AAP should, as a minimum, hold open the option of considering rail-based alternatives because zero-carbon rail transport is currently the only way to ensure the AAP is deliverable.**

3) **Oxfordshire and West Oxfordshire DC policy and AAP have been superseded by HM Government’s policy and announcement on Reversing Beeching and re-opening railways.** Since the drafting of the AAP funding is now available and can be applied for imminently, under the Restoring Your Railway Ideas Fund and other linked funds. There are many examples (e.g. the Borders Railway in Scotland and the “Robin Hood Line” in Nottinghamshire/Derbyshire) where very successful rail reopenings have taken place where it was previously felt impossible. Locally, the resounding success of even just the first, Western Phase of the East/West Rail, between Oxford via Oxford Parkway and Bicester, and on to London Marylebone, is proof positive of the maxim ‘build it and they will come’.

56/02  
cont.



**WOT**

Witney Oxford Transport

[www.witneyoxfordtransport.org.uk](http://www.witneyoxfordtransport.org.uk)

**It is therefore unsound to proceed with only inadequate transport proposals when there are external funds available to explore and develop sustainable transport options.**

- 4) **The AAP misleadingly states that Hanborough Station is 1.8 miles from the AAP area.** It may well be from the north side of the area, but in reality, for many of the new residents a journey of over 3 miles would be required which is unrealistic for walking to commute to the station, is a long cycle for many people and, by virtue of both distance and the very characteristic of Lower Road, is far more likely to be driven.

**This contradicts the stated garden village principles (s. 2, 4, 8 Garden Village Principles). Having to drive across the countryside to another town to access sustainable transport is not a basis for an exemplar green village.**

s. 8.11 states:

“Walking and cycling must be at the heart of all design decisions - from strategic master planning of the site through to the design of individual homes. This will support a reduction in reliance on the car for those living and working at Salt Cross, in turn bringing a range of benefits including improved physical and mental health, a better quality of life, an improved environment and increased productivity”.

56/02  
cont.

- 5) **The reliance on bus services which currently do not exist is unsound** as there is no evidence that a garden village of only 2200 new homes (5,459 est. population) could support the proposed 20-minute frequency bus service, particularly as the strategic focus is on bus improvements on the A40 corridor which is in the opposite direction from Hanborough. Priority is given to walking and cycling for local journeys. Unless the s.106 requirement includes a subsidy in perpetuity there is no way to ensure that bus services continue to operate (other than a long-term subsidy from Oxfordshire County Council which has not been secured).

The congestion at Hanborough is already a recognised problem and the scale of improvements there is dependent on funding from sources that the AAP has no control over. It is also subject to the preparation of an SDP (the outcome of which is unknown) and national investment decisions yet to be taken regarding the North Cotswold line. We fully support the proposals for improving the rail offer and connections to Hanborough, but it is only part of the provision needed. We also note that the Stantec June 2020 Transport Assessment does not believe that a regular bus connection to Hanborough is viable and this



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has been accepted by Oxfordshire County Council. (s. 9.6.20).

**There is no sound sustainable transport policy proposed for journeys beyond the Garden Village. So the AAP is internally inconsistent and unsound on that basis.**

- 6) Finally, since the policy context for the AAP was developed, Oxford has become a greater priority for rail investment. East-West Rail is now under construction beyond Bicester to Bedford (enabling London-avoiding orbital journeys by rail) and cross-Oxford routes, including the reopening of the freight-only Cowley branch to passenger services, are being prioritized with the so-called 'Metro-isation' of routes across Oxford now a potential reality (submitted by Network Rail to HM Government as part of "Project Speed" in August 2020).

56/02  
cont.

The Oxford – Eynsham – Witney – Carterton route, whilst not yet an agreed proposal becomes very much a reality for a western extension of an Oxford Metro (unlike the North Cotswold line which misses most of the major housing areas and proposed developments). **Both 'arms' of an Oxford Metro – to Cowley and via Eynsham westwards – are therefore entirely consistent with the DfT's principal criterion for Restoring Your Railway Ideas Fund** on the principle of "restoring lost rail connections to communities" – like the bids which are now in formulation.

**Our representation is not intended to propose any particular solution – we simply seek to have wording amended to reinstate rail as a consideration for the A40 corridor in accordance with OCC's rail strategy.** We have a presentation which we can show to demonstrate how much this matter has progressed since the AAP was prepared.

**Section 6:** *Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible*

We propose a single modification to the wording of **Policy 15 A40 corridor improvements:**

**Add an additional bullet point which reads:**

**"Additionally or alternatively to contribute to further development of a rail-based option for the corridor through s106 or otherwise".**

56/02  
cont.



WOT

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As stated above, at present the AAP is unsound as it seeks a “zero-carbon development” but is dependent on sustainable transport links that have not been approved, cannot be sustainably secured in planning terms, and would undermine the proper evaluation of sustainable options for the A40 Corridor.

Since the AAP was drafted, the UK Government has committed to statutory climate change targets and to funding the investigation and development of railway reopening proposals.

It is already Oxfordshire County Council policy that the Oxford-Eynsham-Witney corridor is a longer-term aspiration. We also note that the Stantec June 2020 Transport Assessment is clear that there are many uncertainties and that flexibility in the Transport Strategy is essential (s10.2.2).

Therefore, to make the AAP sound, consideration of the rail options must be included at this stage. There is already provision for a park and ride facility and corridor improvements (part of Grosvenor’s Oxfordshire Garden Village Outline Planning Application 2020) so a rail option is still worthy of consideration. It is fully accepted that further consideration may mean that a rail link cannot be delivered as part of this process, **but the proper, sound planning of the area requires this wording amendment so that the option is not prematurely foreclosed without proper investigation.**

**Sections 7 and 8:** *If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:*

We are proposing that potential developer support for the rail option is kept open for consideration. There will be many questions as to how this can be done, benefitting (and not adversely affecting) the rest of the AAP and we have a presentation and a range of up to date information that needs to be scrutinised to be fully understood. We believe that parties would understand and could agree with our proposed amendment if we are able to present it and subject it to questioning at the hearing.

The written submission format does not sufficiently allow us to do this or enable us to leave the Inspector with the most up-to-date information before deliberating on recommendations to the Secretary of State.

**We are therefore seeking a modification of the AAP, considering it necessary to participate in a hearing session.**

---

**From:** Nicky Cayley [REDACTED]  
**Sent:** 28 September 2020 12:59  
**To:** Planning Policy (WODC)  
**Subject:** Salt Cross Garden Village Draft Area Action Plan (AAP) - Consultation Response from Witney Town Council

Dear Sir/Madam

Witney Town Council wishes to make the following response to the Salt Cross Village Draft Area Action Plan consultation:-

57/01

Witney Town Council believes that the Area Action Plan is not sound in terms of the transport measures. The plans for the A40 are unsound as it does not take into account the additional housing going into Witney and Carterton. It is not taking into account that the plans for dualling the A40 will lead to another pinch point and the AAP does not take into consideration traffic going into Witney, particularly at the Shores Green junction and the Ducklington roundabout. The Town Council does not believe that the Park and Ride site will be able to service all of the increased traffic movement created by Salt Cross.

Witney Town Council would like to see the Shores Green junction in place to ensure smooth running of the A40 before Salt Cross is started.

Kind regards

Nicky  
Nicky Cayley B.A (Hons) CiLCA  
**Democratic Services Officer and Secretary to the Mayor**

Witney Town Council  
Town Hall  
Market Square  
Witney  
OX28 6AG

Direct Line: [REDACTED] - Calls to this number may be recorded for monitoring/training purposes.

*Please note my working days are Monday – Thursday*

: For more information [www.witney-tc.gov.uk](http://www.witney-tc.gov.uk) | Facebook - Witney Town Council | Twitter @witneytowncouncil  
| Witney Town Council App search app store for Witney Town Council or download from



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(Enterprises) Ltd  
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NG31 6LL

Telephone

██████████

Facsimile

██████████

Website

woodlandtrust.org.uk

Planning Policy  
West Oxfordshire District Council  
Elmfield  
New Yatt Road  
Witney OX28 1PB

22nd October 2020

Dear Sir/Madam,

### Reference: Salt Cross Garden Village - Area Action Plan Consultation

The Woodland Trust appreciates the opportunity to comment on the above consultation. As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 28,800 hectares and we have 500,000 members and supporters.

Our response covers the following areas:

- Impacts to Eynsham Wood
- Comments on the AAP draft policies

In summary:

- We welcome recognition of our concerns about impacts on Eynsham Wood and reserve the right to object to development proposals which fail to address these
- We welcome the commitment to 50% green infrastructure
- We welcome the aim to exceed 10% biodiversity net gain and potential to connect up existing areas of woodland as part of that
- We seek stronger targets on tree canopy cover throughout the site, with a 30% canopy cover target
- We seek a commitment to provide adequate recreational greenspace within the site, in line with the Trust's Woodland Access Standard
- We encourage greater use of natural solutions, including tree retention and planting, as part of the plan's net zero carbon goal and other policies.

58/01

### Impacts to Eynsham Wood

Last year, we commented on the then Oxfordshire Cotswolds Garden Village Area Action Plan (AAP) – Preferred Options consultation, when we noted that all three options for the proposed development would be sited directly adjacent to a Woodland Trust-owned site, Eynsham Wood (grid ref: SP425101).

58/02

We welcome the recognition in section 6.56 of the proposed Area Action Plan of these concerns:

6.56 *The Woodland Trust, who own and manage Eynsham Wood, have concerns about the impact of development on woodland, highlighting issues of disturbance through noise, light, trampling, fragmentation of habitat and changes to hydrology. They identify a number of mitigation measures that need to be implemented, including the use of an adequate buffer zone between the built development and the woodland.*

The Woodland Trust is particularly concerned about the following impacts to the woodland:

- Disturbance by noise, light, trampling and other human activity;
- Fragmentation as a result of the destruction of adjacent semi-natural habitats;
- Development providing a source of non-native plants and aiding their colonisation;
- There can be changes to the hydrology altering ground water and surface water quantities. Also the introduction of water run offs from urban development will result in changes to the characteristics and quality of the surface water as a result of pollution/contamination etc.
- Where gardens abut woodland or the site is readily accessible to nearby housing, it gives the opportunity for garden waste to be dumped in woodland and for adjacent landowners to extend garden areas into the woodland. It creates pressure to fell boundary trees because of shade and leaf fall and interference with TV reception. It also forces boundary trees to be put into tree safety inspection zones resulting costs for neighbours and increasingly comprehensive felling.

The close proximity of a large residential development to our site could have numerous adverse impacts on the woodland. Currently the proposed site acts as a protective buffer and area of undeveloped and natural habitat adjacent to Eynsham Wood. By replacing this natural area with a residential development there will be a dramatic change in the intensity of the land use. This will expose Eynsham Wood to a variety of outside influences, also known as edge effects, which may impact negatively on the site.

We would expect the necessary mitigation requirements set out in our previous submissions to be secured by way of planning consent conditions and/or developer obligations (e.g. section 106 Agreement capital works/contributions or CIL). We would therefore like to see the last sentence of paragraph 6.56 amended as per bold type – *“They identify a number of mitigation measures that need to be implemented **and funded by way of developer obligation conditions, including the use of an adequate buffer zone between the built development and the woodland**”*.

### **Buffer zones**

In order to protect the site’s fauna and flora from exposure to edge effects it is necessary to implement a buffer zone. A buffer is a landscape feature used to protect sensitive areas from the impacts of development (or other harmful neighbouring land use). The buffer could be planted with trees or shrubs or it could be an area of land which the development is not allowed to encroach upon (e.g. a grassy strip).

Where developments adjacent to our sites are not adequately buffered, the long-term retention of trees at the edge of our site is likely to be affected. Issues such as shading, leaf fall,

overhanging branches and general health and safety concerns can all lead to neighbouring landowners wanting to either lop or fell our trees. The implementation of suitable buffers allows such issues to be avoided.

Buffers should be designed on a case by case basis, and depend on a variety of factors, such as number of houses, alternative areas of green space available, layout of the development, etc. The Trust recommends that a buffer of **at least 30m** is implemented between the proposed development and Eynsham Wood. This buffer should consist of 50% planting of semi-natural vegetation.

### **Policies 1-3 Climate action**

We welcome the commitment to a net zero carbon development and a natural capital approach, but note that the specific policies here relate largely to built environment solutions around energy and waste.

58/04

Natural solutions also play an important role both in reducing the amount of CO2 emissions and in improving resilience in the face of climate change impacts. Trees and woodland absorb CO2, mitigate the urban heat island effect through transpiration, and provide shelter and shade. As part of wider green infrastructure networks, trees assist with flood management and sustainable drainage.

Increasing tree canopy cover is a key policy recommendation of the UK Committee on Climate Change, as a key mechanism to lock up carbon in trees and soils, and provide an alternative to fossil fuel energy and resource-hungry building material. We recommend setting a specific target for tree canopy cover as part of the wider GI target in Policy 7. Such a target would also make a positive contribution to the policies on biodiversity and on access to green space.

### **Policies 4-8 Healthy place-shaping**

We welcome the commitment in **Policy 6** to provide high quality outdoor recreation space. Eynsham Wood was planned to meet the needs of the existing population but could not sustainably meet those of a future new settlement. In order to protect Eynsham Wood from over use, it is important that a suitable amount of accessible natural green space be provided within the site boundaries. We recommend including the following standards for access to natural green space and woodland for existing and new developments.

58/05

Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:

- Of at least two hectares in size, no more than 300m (five minutes' walk) from home.
- At least one accessible 20-hectare site within 2km of home.
- One accessible 100-hectare site within 5km of home.
- One accessible 500-hectare site within 10km of home.
- A minimum of one hectare of statutory local nature reserves per 1,000 people.

The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

We welcome the commitment in **Policy 7** to 50% green infrastructure throughout the scheme. We recommend setting a target for tree canopy cover as part of the GI policy. Hedgerows and trees outside woods provide vital connectivity between habitats, contribute shelter and shade, and assist with water management, among other green infrastructure benefits.

58/06

Ideally of 30 per cent of the site should have tree canopy cover, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.

To achieve ongoing benefits, green infrastructure needs to be protected and maintained. CIL allocations should include green infrastructure, including management plans and funding for maintenance. Natural green infrastructure is cost-effective: for example, trees cost less to maintain than regularly-mown turf and have wider biodiversity benefits. We would support the establishment of a community based charitable village trust to take on future stewardship and maintenance of the Garden Village green infrastructure including woodland (para11.89). In this regard, we recommend our Community woodland website - <https://www.woodlandtrust.org.uk/plant-trees/community-woods/> - which contains a host of advice on funding, acquiring, planning and managing community woods.

The Woodland Trust has produced detailed guidance on protection of existing woodland and incorporation of trees in development sites.

- Residential developments and trees 2019  
<https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/>
- Planners manual for ancient woodland 2019  
<https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>

### **Policies 9-12 Protecting and enhancing environmental assets**

We welcome the approach that sees the natural environment as an opportunity rather than a series of constraints. We urge a landscape-scale approach to maximise the benefits for nature and people, connecting to the wider Nature Recovery Network proposals for Oxfordshire.

58/07

We note and welcome the intention in **Policy 9** to exceed the proposed minimum 10% national level for net biodiversity gain. It is important that comprehensive mapping of environmental assets, including smaller areas of ancient woodland, and individual veteran trees is undertaken.

58/08

The various approaches set out including retention of important trees and hedgerows and creation of more, alongside community orchards and other accessible natural space, are to be welcomed.

We particularly welcome the recognition of the potential for broadleaf woodland creation throughout the site, and to connect Eynsham Wood with Vincent Wood as identified in section 7.60.

These admirable goals need to be underpinned with specific targets, and with appropriate resourcing allocated for future protection and maintenance. In particular, a robust policy to support the retention of existing trees, with a greater than 1:1 replacement standard where removal of trees is unavoidable, would be necessary to meet these policy aims in practice.

Ancient woodland and veteran trees are some of our most precious natural assets and should receive absolute protection, including appropriate buffering from development. We recommend a precautionary 50m buffer for any area of ancient woodland, noting that this buffer zone can be set aside for natural regeneration to increase tree canopy cover and/or be part of the accessible amenity space serving the development.

As part of **policy 10**, we welcome the focus on natural SuDS. In addition, we would add the value of strategic tree planting as part of a water and flood management strategy. Creating shade over rivers (riparian shade) is important for maintaining suitable freshwater habitats at risk from the effects of climate change. Trees help stabilise river banks from erosion, trap and retain nutrients such as phosphates and nitrates, and help capture sediment in polluted run-off before it reaches rivers and streams. Further guidance is available in the Trust publication, *Keeping Rivers Cool: A Guidance Manual Creating riparian shade for climate change adaptation*.

58/09

Natural flood management techniques can make an important contribution and should be part of the resilience strategy. Measures such as leaky dams help slow and store water upstream, in order to reduce flooding downstream. In addition to flood protection, natural flood management provides multiple biodiversity enhancements and natural capital benefits.

#### **Policies 13-17 Movement and connectivity**

We welcome policies that support low carbon transport modes and reduce the impact of hard transport infrastructure and polluting traffic movements. Woodland, particularly ancient woodland, is vulnerable to the negative impacts of transport infrastructure and traffic, including severance causing fragmentation and isolation from the wider environment, and environmental degradation from chemical run-off, air, noise and light pollution.

58/10

Where new transport infrastructure is proposed, we encourage policies that explore its potential for delivery of major tree planting and woodland creation, the construction of wildlife bridges and green corridors and the restoration of woodland. In particular, we welcome the opportunity for new green bridges across the A40 but note that these must have sustainable funding from the development.

We welcome the integration of tree planting into new walking and cycling routes, to provide shelter and shade and to maximise the potential of these new green corridors for habitat connectivity.

We have no specific comments on policies 18-21 (employment) or 22-26 (housing needs).

**Policies 27-31 Building a sustainable community**

We support the principles set out in **Policy 27** which reflect key policies but are concerned that biodiversity net gain is not one of those highlighted here, especially as the amount/proportion of green and blue infrastructure provided has been identified as a key indicator. We recommend adding as a principle “Make a positive contribution to enhancing and conserving the natural environment and delivering biodiversity net gain”.

58/11

We are pleased to see **Policy 30** state that – “*Appropriate mechanisms including the use of planning obligations and planning conditions will be used to secure an appropriate package of improvements for the long-term benefit of the local community*”. We would therefore like to see this policy contain explicit reference to inclusion of Green Infrastructure in the ‘appropriate package of improvements’ by way of adding the wording ‘**...as set out in Appendix 5**’ to this sentence.

58/12

**Conclusion**

The Trust will continue to object to proposed developments until our concerns with regard to Eynsham Wood are fully addressed. This includes an adequate buffer zone and an agreement on site access to ensure that any potential damage to our site will be alleviated entirely.

58/13

In addition to our concerns about the impact on Eynsham Wood, we believe there is an opportunity for the Garden Village to demonstrate best practice in terms of tree canopy cover, green infrastructure and access to natural green space, within its boundaries, and our comments suggest specific targets and policies to help achieve this.

We hope you find our comments to be of use to you. If you are wish to discuss any of the issues raised by the Woodland Trust, then please do not hesitate to get in contact with us.

Bridget Fox  
Regional External Affairs Officer - South East

Telephone: [REDACTED] | Mobile: [REDACTED]  
Email: [REDACTED]



---

**From:** Janine Saxton [REDACTED]  
**Sent:** 04 November 2020 14:39  
**To:** Chris Hargraves  
**Subject:** FW: Salt Cross Garden Village Draft Area Action Plan (AAP)  
**Importance:** High

Good Afternoon,

Email address originally sent this to not recognised... Is there anyway it can be included? Please....

Kind Regards

[REDACTED]

Janine Saxton  
Town Clerk  
Woodstock Town Council

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**From:** Janine Saxton  
**Sent:** 04 November 2020 14:29  
**To:** 'policy@westoxon.gov.uk'  
**Subject:** RE: Salt Cross Garden Village Draft Area Action Plan (AAP)  
**Importance:** High

Good Afternoon,

Apologies for the delay in sending this email. I am afraid that half-term childcare got in the way of some of my follow up actions from WTC's October meeting.

Please find below the response from Woodstock Town Council in relation to the above agenda item:-

**WTC170/20      SALT CROSS GARDEN VILLAGE DRAFT AREA ACTION PLAN (AAP):**

The Council **resolved** to inform West Oxfordshire District Council that both Woodstock and Bladon will also be affected by the Salt Cross Garden Village development as the village will have an exit onto the A40 and also Lower Road which leads on to the A4095. This will have an impact on the traffic in both Woodstock and Bladon and the A44 especially during construction of the village which may coincide with structural change on the A40.

59/01

Kind Regards

[REDACTED]

Janine Saxton  
Town Clerk  
Woodstock Town Council

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**From:** West Oxfordshire Planning Policy Consultations (do not reply) [mailto:do-not-reply@planningconsultation.westoxon.gov.uk]

**Sent:** 09 September 2020 17:01

**To:** Janine Saxton

**Subject:** Salt Cross Garden Village Draft Area Action Plan (AAP)

## Message from West Oxfordshire Planning Policy Consultations

Dear Sir/Madam

### Salt Cross Garden Village Draft Area Action Plan (AAP)

You will be aware that land to the north of the A40 near Eynsham is allocated for development in the West Oxfordshire Local Plan in the form of a new garden village. Known as 'Salt Cross,' the garden village will be led by a new Area Action Plan (AAP).

The District Council has now prepared a final draft version of the AAP which it proposes to submit to the Secretary of State for independent examination. The AAP establishes a vision for Salt Cross, supported by a series of core objectives and policies which will be used to guide future development proposals as they come forward.

Before the AAP can be submitted, it must be published for a statutory period of public consultation which is running for 8-weeks from **Friday 28th August 2020 until Friday 23rd October 2020**.

The draft AAP and a range of supporting documents have therefore been published on the Council's website at [www.westoxon.gov.uk/gardenvillage](http://www.westoxon.gov.uk/gardenvillage)

Paper copies will shortly be made available in the following libraries which have re-opened following the Covid-19 crisis:

- Carterton Library - 6 Alvescot Road, Carterton, OX18 3JH
- Chipping Norton Library - Goddards Lane, Chipping Norton, OX7 5NP
- Eynsham Library - 30 Mill Street, Eynsham, OX29 4JS
- Witney Library - Welch Way, Witney, OX28 6JH
- Woodstock Library - The Oxfordshire Museum, Fletcher's House, Park Street, Woodstock, OX20 1SN

For further information on library opening times please visit: <https://www.oxfordshire.gov.uk/residents/leisure-and-culture/libraries/reopening-libraries>

Should more libraries re-open during the 8-week consultation period, paper copies will be made available in those locations accordingly.

We would very much welcome your comments on the draft AAP and these can be made in writing, or by way of electronic communications.

The options for responding are set out below.

- Online by registering at <http://planningconsultation.westoxon.gov.uk>
- By completing and returning the AAP standard response form which can be downloaded at [westoxon.gov.uk/gardenvillage](http://westoxon.gov.uk/gardenvillage)
- By sending an email to [policy@westoxon.gov.uk](mailto:policy@westoxon.gov.uk)

- By writing to Planning Policy Team, West Oxfordshire District Council, Elmfield, New Yatt Road, Witney, OX28 1PB

As the consultation relates to the submission draft AAP, comments should be focused on three main issues; whether the AAP is 'legally compliant', whether it is 'sound' and whether the Council has complied with its statutory duty to co-operate. Further information is set out in a guidance note which is available to download at [www.westoxon.gov.uk/gardenvillage](http://www.westoxon.gov.uk/gardenvillage). Any representations may be accompanied by a request to be notified at a specified address of any of the following:

- the submission of the AAP for independent examination under section 20 of the Act,
- the publication of the recommendations of the person appointed to carry out an independent examination of the AAP under section 20 of the Act; and
- The adoption of the AAP.

All representations received will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

If you have any questions or require further clarification, please feel free to contact me on the number above.

Yours faithfully

Chris Hargraves

Planning Policy Manager

FAO: Joan Desmond  
Planning Policy West Oxfordshire District Council New Yatt Road  
Witney OX28 1PB

## Garden Village Area Action Plan Consultation: A Community Response

This community letter<sup>1</sup> is an abridged version of EPIC/GreenTEA's formal response to the West Oxfordshire District Council's Garden Village Area Action Plan (AAP) pre submission draft, August 2020. It is supported by the undersigned residents of Eynsham and surrounding villages below who welcome the progressive focus of this plan in terms of WODC taking Climate Action seriously and we hope others will be inspired by a true exemplar.



Most residents oppose the principle of major development around Eynsham and doubt the housing need figures, while welcoming genuinely affordable housing for recognised local need.<sup>2</sup> However now that the site for the Garden Village is in the adopted Local Plan we, the undersigned residents of Eynsham and surrounding villages, hope that it will be a true exemplar village, demonstrating Garden Village principles and good practice in terms of its environmental impact, biodiversity and place making with high specifications for housing design and meeting zero carbon standards, while providing benefits to the area as a whole. We therefore generally support the ambition and policies set out in the Area Action Plan (AAP) pre-submission draft and welcome the

60/01

statement: *'the District Council having recently declared a climate emergency, the vision is focused on climate action, which forms a golden thread running through the whole AAP in areas such as sustainable construction and renewable energy, waste, the water environment, transport, design and biodiversity.* We also welcome the focus on delivering Garden Village principles.

The policies are generally underpinned by sound evidence including studies commissioned for the AAP, for instance the Infrastructure Delivery Plan, Zero Carbon Studies and the Community Land Trust Report. In some cases, further surveys and reports are required of the applicant and the effectiveness of policy will depend on the rigour with which these requirements are enforced and assessed. It is welcome that the Infrastructure Delivery Plan is one study that covers the cumulative impact of development including the West Eynsham SDA on our area, as this is a key concern of residents, but this report recommends a range of future actions to ensure a co-ordinated approach. We also acknowledge that many of our former consultation responses are reflected in the policies.

---

<sup>1</sup> All paintings of the Garden Village in this letter are reproduced by kind permission of © Eric White, an Eynsham resident, who wanted to preserve the beauty of the site in all seasons before the development began.  
(<https://eynsham-pc.gov.uk/org.aspx?n=Eric-White>)

<sup>2</sup> Nearly 1400 people signed our 2018 petition (<https://www.change.org/p/the-planning-inspector-housing-for-local-needs-that-people-can-afford-that-doesn-t-ruin-the-countryside>)

Generally, we think that the AAP would benefit from better cross referencing: there are multiple references to topics where the Policy is in another section. For clarity, we also suggest more cross reference is made between measures and Policies. In addition, we consider that to be effective, several Policies and section 12 Delivery and Monitoring Framework need more quantified measures of success and failure, a timescale and details of how this process will be resourced and monitored in the long term.

Below we consider each theme of the AAP, comment on core objectives and the soundness of evidence, how it is reflected in Policy and in some cases suggest amendments or list further supporting evidence.

## Climate action

We welcome the greater focus on climate action and support core objectives GV1- 4 and related policies for climate action, resilience, zero carbon and zero waste.

60/02

### **Commentary on soundness of Policies, core objectives and supporting evidence**

The urgent need to address climate change is now beyond doubt. It was reported on 7 October that, yet again records were broken and September 2020 was the warmest on record.<sup>3</sup> The following day no less figures than Sir David Attenborough and the Duke of Cambridge launched the £50m 'Earthshot' prize with the ambitious goal of "repairing the planet by 2030".<sup>4</sup> We need to act now.

### **Policy 2– Net-Zero Carbon Development**

The AAP policy is consistent with national and local policy as well as the Eynsham Neighbourhood Plan; there is wide local support for climate action, shown by WODC's recent survey<sup>5</sup> and this document demonstrates climate leadership in the run up to UK hosted COP26. WODC has secured impressive evidence on the need for and the feasibility of taking action to achieve a net - zero energy positive development, notably the report from Elementa on construction and energy standards, whose authors (sustainability experts, engineers, architects and cost consultants) were also co-authors for the widely quoted LETI *Climate Emergency Design Guide* which calls for radical action and pathfinder projects now.<sup>6</sup> This report is also endorsed by Grosvenor. If we are to meet the challenge of climate change, Passivhaus or equivalent building techniques are needed to reduce heating demand in all buildings to less than 15kWh/m2/yr, as well as energy efficiency (EUI) targets, modelling of overheating and reduction in embodied carbon, in accordance with Policy 2– Net-Zero Carbon Development. We fully endorse the Policy standards for net zero construction, reduced embodied energy, no gas, 100% renewable energy and long term monitoring, with minor suggestions below. In this respect the required viability assessment will need thorough scrutiny and challenge, especially if left to reserved matters stage.

60/03

This policy avoids the cost of retrofit which would be inexcusable in an exemplar project. This is consistent with Secretary of State for Housing, Communities and Local Government Robert Jenrick's Statement on August 1<sup>st</sup> 2020 that "We will build environmentally-friendly homes that will not need to be expensively retrofitted in the future..."<sup>7</sup>

<sup>3</sup> <https://climate.copernicus.eu/surface-air-temperature-september-2020>

<sup>4</sup> <https://earthshotprize.org>

<https://www.bbc.co.uk/news/science-environment-54435638> . It is the largest ever environmental prize

<sup>5</sup> <https://www.westoxon.gov.uk/environment/climate-action/climate-action-and-what-we-are-doing/>

<sup>6</sup> <https://www.leti.london/cedg> The free guide has already been downloaded more than 15,000 times.

<sup>7</sup> <https://www.telegraph.co.uk/politics/2020/08/01/radical-necessary-reforms-planning-system-will-get-britain-building/>

## Suggestions

We suggest that under Policy 2 the anonymised measurement and verification results should also be available to residents and the management organisation. We also recommend funded provision of independent site inspection of building quality to address the 'performance gap'.

Policy 2 -Embodied carbon targets should be lower and we think full life cycle carbon modelling should be required rather than encouraged.

Para 5.24- mentions woodfuel: this should be deleted: it is not a zero carbon heating solution and it damages local air quality.

Para 5.38 - should include the Low Carbon Hub as a project LEO partner.

Para 5.40 - refer to the Project LEO Eynsham Smart and Fair Futures energy project and associated business models and long term stewardship. We regret the omission of former text on "...a requirement for development of the garden village to be underpinned by an ambitious and pro-active approach to decentralised, renewable and low carbon energy at a range of different scales from site-wide to property specific', given that the Smart and Fair Futures energy project supports this aim.

## Additional evidence

Para 5.43 explains that costs will reduce as zero carbon building becomes mainstream and this is beginning to happen. Expertise is also spreading and the resultant homes which are comfortable and cheap to run are proving popular and address fuel poverty. York is planning to build 600 Passivhaus social homes in an exemplary car free neighbourhood.<sup>8</sup> Stirling Prize winner Goldsmith Street is a development of 100 Passivhaus social homes.<sup>9</sup> Leeds City Council's Climate Innovation District is an exemplar sustainable scheme of over 520 new low carbon home and there is a 225 low carbon house development at Parc Eirin near Cardiff.<sup>10</sup>

There is substantial local support and expertise in the field of zero carbon energy, notably through Project LEO, under which the ambitious Eynsham Smart and Fair Futures energy project is now proceeding, with Transition Eynsham Area (GreenTEA) an active member. The RIBA climate challenge states embodied carbon for domestic buildings should be below 450 kgCO<sub>2</sub>/m<sup>2</sup> by 2025 and 450 kgCO<sub>2</sub>/m<sup>2</sup> 300 by 2030: more ambitious than than Policy 2.<sup>11</sup>

## Healthy Place Shaping

The introduction to Healthy Place Shaping emphasises the garden city requirement to design Salt Cross as a 'beautiful, healthy and social community'. It demonstrates that such a requirement is a strategic priority for Oxfordshire (6.5) and that it should be embedded in the planning process. Documented challenges to this embedding are set out. These include air pollution that is relevant to Policy 4 (6.6). In the Oxfordshire Plan 2050, a new policy for healthy place shaping is being developed which is likely to establish countywide standards in 2021. In the meantime, the garden village will be based on national current best practice and guidance which have been assessed against local health

60/04

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<sup>8</sup> <https://www.theguardian.com/artanddesign/2020/oct/04/everest-zero-carbon-inside-yorks-green-home-revolution> 'The city plans to build Britain's biggest zero-carbon housing project, boasting 600 homes in car-free cycling paradises full of fruit trees and allotments. When will the rest of the UK catch up?'

<sup>9</sup> <http://www.mikhailriches.com/project/goldsmith-street/#slide-2> Exeter has built several schemes to Passivhaus principles. <http://www.ecodesign.co.uk/projects/residential/chester-long-court/> In Oxfordshire, Greencore have recently completed 25 passivhaus, custom self build and affordable houses

<https://www.greencoreconstruction.co.uk/portfolio/springfield-meadows-southmoor/>; Hook Norton CLT is planning a development of Passive houses. <https://www.hn-lc.org.uk/what-were-doing/community-housing>

<sup>10</sup> <https://leedscitycentrerevision.co.uk/home/south-bank/climate-innovation-district-phase-2> <https://citu.co.uk/> <https://www.parceirin.co.uk/>

<sup>11</sup> <https://www.architecture.com/about/policy/climate-action/2030-climate-challenge/> Further resources from the "Architects Declare" has reached 1000 signatures (13.10.20) <https://www.architectsdeclare.com/>

challenges, the Oxfordshire context and documented good practice and consultation feedback. WODC's assessment resulted in the Checklist of 10 Healthy Place Shaping Key Principles at Salt Cross (Fig 6.1). We are satisfied that the Healthy Place Shaping core objectives and policies are sound as they are based on national, international or local policies, principles or evidence. We are able to support them if areas we have identified as needing improvement are addressed.

#### **Policy 4 - Adopting Healthy Place Shaping Principles**

We are encouraged as we recognise the contributions of EPIC and GreenTEA in the local evidence presented in this section and consider that the way the Checklist of Key Principles (Fig. 6.1) was created is sound.

60/05

However, we cannot consider Policy 4 effective yet because of the fundamentally flawed objectivity on the area's assessed needs. This is in relation to transport infrastructure development that will reduce air pollution<sup>12</sup>. It will only be fully effective through joint working with Oxfordshire County



Council (OCC), as a reduction in the air pollution levels along the A40 must be achieved by the time the first residents move in. Also reducing effectiveness is the omission in the key outputs at Salt Cross section (p.7) of a recognition of the relationship between green and wild space with physical, mental and emotional health of current and future residents and workers. Given our Climate and Ecological Emergency and risk of pandemics is becoming more urgent and frequent, health and well-being will need to be considered more carefully throughout the AAP. Homeworking is included in Policy 19, but there are no targets or

measurements included. We welcome inclusion of shared public space for home-workers (6.25), so we think you might like to consider an even more radical approach to the public realm<sup>13</sup> in the village centre, features of which already exist in Eynsham and make it so healthy and life-affirming, as well as reducing our carbon footprint.

#### **Policy 5: Social Integration, Interaction and Inclusion**

This policy is concerned with the aspiration to create a new place where those who live and work there feel part of a 'strong, vibrant, connected and inclusive community' (6.14). Creating the infrastructure for such a community fosters 'an environment that achieves good mental health and wellbeing by reducing social isolation and loneliness and encouraging opportunities for social interaction'. Such infrastructure includes community hubs and community partnerships.

60/06

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<sup>12</sup> p54: In relation to the key public health indicators about air pollution, it is stated that 'This causes more harm than smoking and is linked to asthma, heart disease and stroke. Transport is now the largest source of carbon emissions in Oxfordshire'. Given that Salt Cross is located on the A40 (the busiest and most congested road in the county) along the entire length of its southern boundary, it is strange that the check list in Figure 6.1 (p.55-56), does not address the challenge of air pollution caused by transport on the A40 or in the village itself. This is in sharp contrast to the newly announced scheme in York (<https://www.theguardian.com/artanddesign/2020/oct/04/everest-zero-carbon-inside-yorks-green-home-revolution>). Policy 11 requires an air quality assessment for the Outline Planning Application (this is included in Grosvenor's Environmental Statement)

<sup>13</sup> <https://www.bioregional.com/news-and-opinion/re-imagining-our-high-streets>

The aspiration of creating a safe environment that fosters social interaction and community partnership, is supported by NHS England (6.20) and the Eynsham Neighbourhood Plan (6.18). This follows NPPF advice for co-produced community development strategies related to the public realm and cultural well-being. It draws on the Royal Town Planning Institute on how to create dementia-friendly spaces and OCC's Street Design Guide will be used. Safety in public and private realm and crime prevention is to be considered from the outset and the policy draws on the proven Secured by Design police initiative. Provision of a community development officer is welcome.

### **Policy 6 - Providing Opportunities for Healthy Active Play, Leisure and Lifestyles**

Policy 6 could meet the area's objectively assessed needs for leisure and sport facilities when the new studies for West Oxfordshire are completed and considered to be robust. There is also an intention to complement 'existing nearby provision'.

60/07

Active Design principles (6.32), developed by Public Health England in collaboration with Sport England, are proposed to enable social integration, interaction and inclusion for people of all ages through well designed, multi-functional communal facilities and open spaces, green infrastructure, communal sports facilities, play spaces, green spaces, trees and woodland. The positive impact of exercise on mental and physical health especially in open and natural space with trees, woodland and bird song is recognised (6.28). Play design principles (Play England) include using natural elements and being close to nature. Both sets of principles resonate with community engagement evidence gathered during the development of the Eynsham Neighbourhood Plan and from international research on the positive effect of being in Nature on human health and well-being.

### **Policy 7 - Green Infrastructure**

The policy is consistent with national and international thinking on the importance of delivering environmental and life benefits to local communities. Highlighted by the Climate Emergency and COVID-19 pandemic, the importance of this space in creating resilience to extreme environmental events by offering carbon sinks and improving air quality is stressed. Evidence that supports the positive and measurable impacts of green infrastructure on health and well-being is recognised. This was pointed out by EPIC in their 2019 AAP Preferred Options consultation response which suggests that they have listened to our community.

60/08

We welcome the intention to move away from traditional, 'grey' approaches to urban community space towards innovative ways of working in harmony with Nature and the landscape. We are pleased to see the Building with Nature framework of principles will be used for the delivery of quality, multifunctional benefits for people and Nature and conditions for flourishing communities, as well as their standards for measuring quality (Well-being, Water and Wildlife -6.44-48), the requirement for 'Excellent' Award Accreditation and generation of a comprehensive Community Management and Maintenance Plan.

Back in 2018, EPIC stated in its consultation response, 'Should WODC persist with this inadequate and inappropriate site, the development must be state of the art and a world class example of how to respect the environment, cause minimal destruction to surrounding communities and wildlife habitats, and contribute to climate change [action]'. Now we think this Policy goes some way towards reducing the inevitable, negative consequences of choosing this site due to biodiversity (as well as the A40). While the mention of historic designed parks at Blenheim and Eynsham Hall give wider context, it is important that the site's traditional rural landscape character of fields, hedgerows and trees is retained and tree planting reinforced (Policy 7). We strongly support new woodland creation and scrub (6.55), biodiversity (6.62) and intention to conserve and reflect local history (6.63), as well as,

the recommendation for a tree nursery on site and advance tree planting (6.76). This is in tune with the original Garden Cities and would be an opportunity for community engagement at an early stage, e.g., gathering and planting acorns to grow. We hope that steps are taken so that this is more than a recommendation. We also welcome the requirement for community orchards (Table 6.1). and reference to Eynsham’s apple heritage and community activity (6.90).

We conclude that Policy 7 requires minor adjustment, strengthening and clarification in relation to its contextual reference.

### **Policy 8 – Enabling Healthy Local Food Choices**

This policy makes the link between enabling people to eat a balanced and healthy diet by ensuring proximity and easy access to affordable, local, healthy food. Strong community engagement recommendations for providing new community growing spaces have been included with suggestions like balconies, roof tops, raised beds, community gardens and orchards, although requirements for dispersed community growing spaces need to be strengthened. Our culture of food growing in Eynsham is given as an example of what could be aspired towards in Salt Cross. It is stated that further consideration will need to be given to the location, design, aspect, lay out and long-term management needs of these spaces. It is recommended that a food strategy should accompany the Outline Planning Application to include a diversity of food outlets and incorporating edible plants and small community growing spaces in the public domain, as seen at Welwyn Garden City. Our suggestion for schools to co-locate with food production has also been taken up. Policy 8 requires the demonstration and achievement of high quality through the Building with Nature standards with an ‘Excellent’ Award Accreditation.

60/09

Policy 8 is therefore considered sound as long as the Food Strategy takes account of the ideas in this section and is assessed rigorously. (This is a general point where extra studies are required.)

### **Protecting and enhancing environmental assets**

This is a challenging topic as there is evidence that the site is already unusually biodiverse and benefits from long standing organic management and special qualities such as large ancient hedgerows, abundant birdlife with rare and vulnerable ground nesting birds, highly significant arable plants, habitat for hares, deer etc.

60/10

### **Policy 9 – Biodiversity Net Gain, GV12 - To provide measurable net gains for biodiversity and enhancements to natural capital**

Within the context of development, generally speaking, what the AAP has to say about biodiversity is encouraging. The 25% net gain target is very welcome, as long as it can be enforced and not allowed to drift as time goes by. In paragraph 7.65, the list of 19 measures that are part of the biodiversity net gain strategy are good and all the ones that are appropriate for the area should be fully implemented. It will be crucial to check compliance when reviewing the required Biodiversity Net Gain Strategy against Biodiversity Net Gain: Good Practice Principles for Development’ and the subsequent Part A: A Practical Guide (2019) (7.52).

60/11

In addition, WODC needs to bear in mind the consequences for offsite net gain of a new quarry east of Eynsham (SG20b), if the County Council chooses this option.

References to the Nature Recovery Network (NRN) are welcome as well as the fact the site is in a 'recovery zone'. The AAP does not mention the thriving Eynsham's Nature Recovery Network<sup>14</sup> which is very active in projects in the area (although Long Mead LWS is mentioned in 7.72). It is ironic that the Salt Cross development will greatly reduce the amount of land available for nature recovery. We have reached the stage of human evolution when nature recovery should take precedence over economic growth. Furthermore, paragraph 7.144 of the AAP seems to pave the way for further expansion in future to the north and east, which would severely damage the NRN and the wider area's biodiversity, habitat and wildlife connectivity. There should be no further expansion of the garden village beyond the currently envisaged boundary in the outline planning application and it is essential that surrounding open space, the proposed country park and nature reserves are protected from development and that the most sensitive areas are protected from human disturbance.

Yes, please ensure developers use, and pay for, the Trust for Oxfordshire's Environment (TOE) to deliver the biodiversity net gain rather than doing it themselves (**paragraph 7.75 and Policy 9, paragraph 7**). It is important that the net gain funds are spent strategically at the landscape scale, rather than through a piecemeal approach, plot by plot.



On the site itself, the plans for nature reserves are welcome, and advance planting is a must – as much as possible, please. It should be used as a mechanism for creating facts on the ground that will prevent incursions from the built environment at the 'reserved matters' stage.

The proposal for linear woods, in particular one linking Eynsham Wood with Vincent Wood, is welcome. The treatment of hedgerows is not so encouraging. While Policy 7 Green Infrastructure mentions the network of hedgerows, there will be many interruptions by roads (and other development) of the green infrastructure, of which large mature hedgerows are a notable and distinctive feature on this site. The development could well break the law by removing well-established hedgerows of historical significance, which cannot be easily replaced by new planting, and by leaving lasting gaps in connectivity. The spine road is a calamity in this regard.

60/11  
cont.

### **Paragraphs 3.20 (bullet 6) and 7.119 -7.121**

The irreversible loss of Grade 2 and 3a best and most versatile agricultural (BMV) land is an unacknowledged disaster, particularly in relation to non-intensive, nature-friendly farming. It might be argued that to lose just a little of this national resource is acceptable, but in the long term, every acre counts.

**Suggestions:** Policy 9 is well justified, but will only be effective with rigorous monitoring and scrutiny of developers' reports; protection of vulnerable areas and nature reserves from further development and human impact; proper co-ordination and use of local skills (TOE, Eynsham's Nature Recovery Network); advance tree planting; better protection of hedgerows: the amount of hedgerow (2.6 kms) that will be removed appears illegal– enough to stretch unbroken from Millennium Wood to Church Hanborough – with remaining hedgerow repeatedly interrupted (Hedgerows Regulations 1997 and

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<sup>14</sup> <https://eynsham-pc.gov.uk/org.aspx?n=Eynshams-Local-Nature-Recovery-Network>

not reflecting the NPPF): and review of the impact on and appropriate use of best and most versatile agricultural land in any planning application, with reference to paragraphs 7.119 -7.121 and specific inclusion of this in Policy 11.

**Policy 10 – Water environment, GV14 - To ensure that any flood risk mitigation including surface water drainage is effective.**

**Paragraph 5.18 (bullet 1)**

7.90 says built development will only take place within Flood Zone 1 yet the risk of flooding in the east of the site continues to be underplayed in the AAP, as does the likelihood of increasingly severe water stress in the wider area – both as a result of climate change.

60/12

**Suggestion:** The aims of this policy are good, but to be effective, rigorous implementation of Policy 10's requirement for a flood risk assessment and robust scrutiny of the assessment will be crucial.

**Policy 11 – Environmental assets GV13 - To avoid harmful light and noise pollution on local amenity, landscape character and biodiversity conservation.**

GV15 To ensure that development of the garden village seeks to minimise and properly mitigate any potentially harmful impacts on air, soil and water quality.

The AAP correctly identifies local concern about air quality, noise and light pollution as well as the issue of contaminated land. Air quality will only improve if road-based transport decreases and use of fossil fuels is drastically reduced. Given the pressure on the A40 from existing use, large scale new development and Oxfordshire CC's plan to increase road-space, air quality is likely to worsen rather than improve.

60/13

**Suggestions**

We suggest that to be effective this policy needs to require all studies to assess impacts on existing residents on and around the site and in Eynsham; to include protection of best and most versatile agricultural land (as above); an air quality assessment which includes the local Eynsham area over the period of the development; and a lighting strategy to ensure dark skies valued by local astronomers (e.g., a period when street lights are off) and essential to bats and other species.

**Policy 12 – Conserving and enhancing the historic environment of Salt Cross GV16 To fully address and capitalise on the constraints and opportunities presented by heritage assets including the listed buildings at City Farm and the suspected site of the former medieval village of Tilgarsley.**

60/14

The requirement for a Conservation Management Plan is welcome. Please note that the presence of the lost medieval village of Tilgarsley is confirmed, not just "suspected" (GV16, 7.134, 7.145) and therefore deserves thorough research and preservation. There is no mention in the AAP of a possible Roman site near the A40, which would also require archaeological attention.

**Movement and connectivity**

The policies in this core theme are soundly based and part of an integrated design for "place making" and addressing Climate Change (Garden Village Principles 5, 8 and 9 and, specifically, Policy 13). Consistent priority is given to people (amongst others, Policy 13), active travel (walking and cycling in Policy 14) and public transport (Policy 15), rather than car travel (Policy 16). The policies are intrinsically sound and consistent and, with a few exceptions noted below, should be supported.

60/15

The layout and networks of the Garden Village should be designed to be walkable and accessible (Garden Village Core Objectives 17 and 18) and requires key services and facilities to be within a ten minute walk from homes; an important policy objective and one of the key criteria in the Eynsham Neighbourhood Plan. We welcome the walkable green corridors and connected networks of pathways and cycleways providing direct and safe routes to key amenities and destinations within the village and surrounding countryside and villages, so that the residents of other villages can also enjoy the amenities of Salt Cross (6.64 -67); also the provision of cycle parking and relatively low on plot parking provision.

Policy 16 has a requirement for 'areas of the site that will be car free development (minimum 15% of total dwellings)' [ ie c.300]. This is welcome but an exemplary scheme with climate change at its core could go further; innovation, flexibility and good design will be key. Leeds is planning to build 600 Passivhaus social homes in an exemplary car free neighbourhood.<sup>15</sup> Garden Villages have a bad record on car dependence . A recent Transport for New homes report stated that the 20 Garden Communities that they looked at would create up to 200,000 car-dependent households.<sup>16</sup> We need Salt Cross to buck the trend.

60/17

Nevertheless, a settlement of this size will inevitably affect Eynsham, the A40 and local roads. The traffic model shows that the Garden Village would affect the A40 and local roads (8.58) unless A40 Improvements (Policy 15 and 17 for, among others, an 850 car Park and Ride and east and west bus lanes to and from Oxford) as well as, Travel Plans (Travel Demand Management in Policy 16) could persuade sufficient people to switch from their cars to public transport (improved bus and Hanborough railway service, Policy 15) or Active Travel ( walking and cycling, Policy 14).

60/15  
cont.

How successful would these measures be? Would A40 congestion get noticeably worse? This risk is probably understood because there is a specific caveat in Policy 17 that links planning permission for development to A40 congestion. How this would be enforced is interesting speculation.

The Garden Village road network would be designed to encourage residents to walk, cycle or drive to and from the eastern employment area, thereby avoiding use of the A40 (Policy 15).

A Spine Road is proposed between a new A40 roundabout at Cuckoo Lane, across the village to a new junction on Lower Road (Policy 15). The AAP also wants Garden Village roads designed to prevent "rat running" (Figure 8.1, Connectivity within the Garden Village). The new bus service would also have to run through the Garden Village (Figure 8.1). How can these be squared? The inherent tension between these measures is acknowledged in Policy 17 where future bisecting of the Spine Road is considered.

Policy 14 proposes, among others, connections to Eynsham via a cycling and walking underpass at Old Witney Road, an improved crossing at the Witney Road junction and two signalised crossings across the A40 to the east. Although these proposed connections are the result of a feasibility study of options (8.14-8.17), would they be sufficiently convenient for residents of the two settlements, and

60/16

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<sup>15</sup> <https://www.theguardian.com/artanddesign/2020/oct/04/everest-zero-carbon-inside-yorks-green-home-revolution>  
'The city plans to build Britain's biggest zero-carbon housing project, boasting 600 homes in car-free cycling paradises full of fruit trees and allotments. When will the rest of the UK catch up?'

<sup>16</sup> [Garden Villages and Garden Towns: Visions and Reality](https://www.transportfornewhomes.org.uk/the-project/garden-villages-and-garden-towns/) <https://www.transportfornewhomes.org.uk/the-project/garden-villages-and-garden-towns/>



would they minimise car travel and encourage walking and cycling (to and from Bartholomew School for instance)? As many will know, the A40 Improvements, new roundabouts and connections to Eynsham are the responsibility of the County Council as highway authority and not West Oxfordshire District Council as the planning authority. They have different procedures from the Garden Village proposal. However, the developer will be expected to help fund, among other requirements, these network proposals and the cycle and footpath link to Hanborough Station (Policy 17).

## Enterprise, Innovation and Productivity

We support core objectives GV23-27 and related Policies (18 – 21) for enterprise, innovation and productivity. While the Science Park dominates this section, we welcome the proposals beyond the Science Park itself on broader employment opportunities which will provide services for the new population, as well as flexible workspaces and home-working provision. We appreciate and support the thought that has been given to the latter in response to the changing environment in which we find ourselves, due to the global pandemic and climate change and trust that the Policies are robust enough to be enforced.

60/18

We also support the high-level Garden Village Principle 5 of a balanced community of homes and accessible jobs with minimal commuting because of, amongst other things, its centrality for Place Making, addressing the Climate Emergency, a low carbon economy and reducing traffic growth on the A40. However, we are aware that research has shown that self-containment, though a desirable aim, is never achieved in reality and in and out commuting persists. EPIC/GreenTEA **suggest** adding 'in and out' commuting, as an indicator of the balance of jobs and homes and the amount of the additional traffic generated on the A40 and local roads.

Garden Village Core Objectives 23 and 24 seek a balance of jobs and business spaces in the 40 ha/ 80,000m<sup>2</sup> science and technology park (Policy 18) that should help support the development of the wider economy (Garden Village Core Objective 25). Policy 18 links it with strong, sustainable transport link including the Sustainable Transport Hub (including the Park and Ride) and connections to Hanborough Station. Sensibly, not all employment should be in the business park (Policy 19 - Small-scale commercial opportunities and flexible business space). Dispersed, small-scale, commercial and flexible business spaces should be provided around the Neighbourhood Centres to the east in suitable and accessible locations. Therefore, we strongly support both Policies 18 & 19 which reduce the propensity for car travel and attendant A40 congestion.

The science park would have its own ancillary facilities of shops, cafes, gyms, etc (Policy18). Homeworking is given proper prominence with local facilities, fast broadband and dwelling design (Policy 20 Home working). This Policy states that 'Provision should be made as part of the overall mix of uses within any neighbourhood centre and meeting space linked to the science and technology park'. However, to be effective, this and Policy 19 need measurable targets against which fulfilment will be measured, including the key outputs of 'Creation of new community meeting spaces and facilities including opportunities for 'co-working'.. Examples of enterprise in Letchworth, Welwyn and Milton Keynes have long been 'workshop' and enterprise-based.

Possibly, the most interesting policy for Eynsham, apart from an enhanced local employment offer (Policy 18 and 19), is a commitment to training and preference for local labour and business (Policy 21), including a Community Employment plan which we support.

60/19

We suggest the opportunity for onsite fabrication alongside training is added to the Policy. For example at Leeds Innovation district homes will be manufactured at its purpose-built on-site factory.<sup>17</sup>

However, given the ‘golden thread’ of Climate Action in the AAP, we are very surprised that the words “zero” and “carbon” only appear once in this whole section (at 9.17). Since a systems approach is required to reach net zero carbon by 2050, we feel more references to this thread should have been made in this section, particularly as the Science Park alone has the potential to consume more energy than the whole residential portion of Salt Cross. (Nor is the Science Park mentioned in the Climate section (5)).

As well as keeping careful consideration of carbon emissions through energy use, we suggest that in pursuing the principles of a circular economy (Policy 3, GV4), WODC should oversee, or appoint a body to oversee, the recruitment of business tenants such that the theories of Industrial Ecology<sup>18</sup> can be put into practice wherever possible.

This oversight function would also address the continuity challenge suggested by sections 9.19-9.21 and could continue beyond “completion” to ensure that there is the required systems approach to achieving net zero carbon by, and beyond, 2050.

## Meeting current and future housing needs

This section of the AAP is based on strong evidence from the Eynsham Neighbourhood Plan and subsequent consultations which show that what is needed and supported locally is a well-balanced mix of property types, tenures and sizes to meet a broad spectrum of housing needs. We welcome the target of 50% affordable housing and opportunities to rent and buy own their own homes but Eynsham residents are very concerned about the definition of affordability and feel that 80% of the market value in an area like this does not make housing genuinely within reach. It is of great concern that the target is ‘subject to viability’ so to ensure genuine affordability the target needs to be achieved with imagination and flexibility, building on best practice from across the country and backed up with tough enforcement measures.

60/20

The AAP appropriately recognises the evidence of need for social rented housing for single people and families and this should be recognised in the phasing of building, with targets for social rented housing in the early stages and a clear commitment to build for rent as well as shared ownership.

Policies 23, 25 and 26 build on evidence that identified smaller starter homes, houses for key workers and junior staff with local employers, and self build, co-housing and flexible arrangements for those with disabilities or who need live in care. Housing for those with care needs should be located centrally to enable integration into the community. There must now be a genuine attempt to reach out to identify and quantify these needs and set targets as without this there is a danger that the developers

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<sup>17</sup> <https://southleedslife.com/citu-creating-climate-innovation-district-hunslet/>

<sup>18</sup> Industrial Ecology promotes design which intentionally locates businesses and buildings so that the waste products, including heat, of one business are used as raw materials for others. This mimics a natural system; biota have been optimising resource use and minimising waste, by necessity, since life first occurred.

will say they do not have the evidence and will revert to standard provision. One gap appears to be any reference to space standards. The UK is building the smallest homes in Europe and we suggest reference to the well-received *NHF Housing Standards Handbook (2016)*.<sup>19</sup>

Given that Oxford's unmet housing need was a key driver in identifying this site there should be a genuine collaboration and a financial contribution from Oxford which would help address the questions raised by the developer about viability. Now that Oxford's growth targets have been scaled down these houses should be transferred to people on the housing list in West Oxfordshire.

### **Housing in a Garden Village**

A key feature of a Garden Village is the recognition of the importance of, and shared access to green space and this was a key topic raised in the various local consultations in particular the importance of shared spaces as integral to the housing design and layout, not just as separate parks or recreation areas. Shared spaces for growing, play areas and trees need to be protected close to the housing in a way that encourages neighbourliness and community responsibility.

### **Co-housing, Self Build and Community Land Trusts**

We are very pleased to see the commitment to self build and support for co-housing and as a way of meeting local need in Policy 25. We welcome the target of 110 self and custom-build opportunities distributed in small, attractive clusters across the garden village site, but see this as a minimum with further potential to be explored.

60/21

We are impressed with the WODC report on Community Land Trust Options<sup>20</sup> and are keen to explore these ideas further. As evidence of local interest a new group is now emerging supported by Collaborative Housing in Oxford and this opportunity should be actively promoted by WODC to ensure delivery.

There are many advantages of setting up a Community Land Trust (CLT) both for smaller community led initiatives but also as a possible route to create the community ownership and governance consistent with Green Village principles for the site as a whole. A CLT would be one of the key ways to secure the commitment to the climate change objectives such as limited car parking, facilities of electric cars etc. It could also prevent subletting and Airbnb which constitute a real threat to community cohesion. We urge WODC to follow up on Policy 25 to explore options with community representatives and organisations.

We would support the development of community-led housing SPD.

### **Additional evidence**

There are increasing numbers of examples of CLTs delivering and managing high quality equitable housing. The CLT report highlights Kennett Garden Village, where the CLT is responsible for 500 homes.<sup>21</sup> East Cambridgeshire now has 10 CLTs, there is a CLT in the Leeds Innovation district and

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<sup>19</sup> <https://www.architecture.com/riba-books/books/urban-design-planning-housing-and-infrastructure/planning/product/housing-standards-handbook-a-good-practice-guide-to-design-quality-for-affordable-housing-providers.html> The authors also worked on the Elementa zero carbon report and the LETI climate emergency design guide.

<sup>20</sup> Collaborative Housing, *Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village* June 2002

<sup>21</sup> Kennett Garden Village (Palace Green Homes)

there are several CLTs in London.<sup>22</sup> The TCPA guides include one long term stewardship which covers the role of community land trusts.<sup>23</sup>

## Building a Strong, Vibrant and Sustainable Community

As with several other policy areas, the aspirations are good and reflect community feedback, but are often too vague and are not always measurable or enforceable.

60/22

### Policy 27 – Key development principles

This policy has laudable principles although it fails to address an issue of major concern to Eynsham residents, i.e., links to Eynsham. Salt Cross and the existing village of Eynsham will not be two distinct and separate villages. The plans must recognise the interdependency in terms of services, shops, jobs, transport, amenity and this needs to inform all the plans. The planned underpass at Witney Road is an unattractive and limited option and we continue to press for an attractive walking and cycling bridge at the eastern edge of the site. Salt cross will be vibrant if it is linked-in to the one of the most vibrant villages in West Oxfordshire, if not Britain. So, we suggest a clause is added 'to complement Eynsham and build on its vibrant community'.

60/23

### Policy 28 – Land uses and layout – the spatial framework and Policy 29 – Design requirements

Table 11.1 – Anticipated amount and mix of different land uses at Salt Cross.

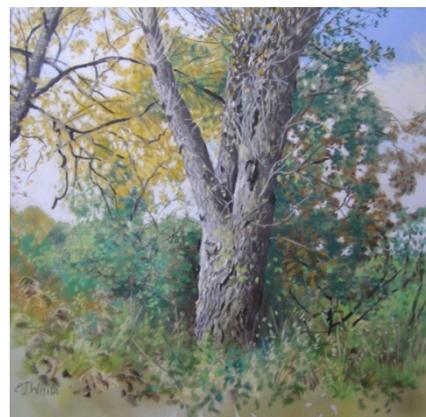
This section mentions facilities we would support, such as smaller-scale employment space, a mixture of different community use, but these are 'to be determined at a later date through detailed/reserved matters.' While the Eynsham Area Infrastructure Delivery Plan identifies a potential need for around 385 m<sup>2</sup> of floorspace for culture and the arts and around 1,056 m<sup>2</sup> for community meeting space, these are not defined in Policy 28.

60/24

Figure 11.6 Illustrative Spatial Framework indicates the secondary school on high ground about a mile distant from Bartholomew which will inevitably lead to increased and damaging car use; the building would be prominent and require exceptional design. The plan does not show footpath connections to the east of the site.

### Suggestions:

- We propose that Policy 28 should set aside minimum areas for community and cultural spaces, which should include support for home workers in each neighbourhood.
- The wording on 'Effective and safe pedestrian and cycle connections' should explicitly mention links to Eynsham and core services such as education and health services.
- The text 'Principal movement corridor/s to be designed so as to discourage unnecessary through traffic' should include 'and to give priority to other modes over car travel through surface and ,to text 'Continuous green space around the northern fringe of the site in the form of a biodiverse Country Park to include a mixture of



<sup>22</sup> <https://www.londonclt.org/>

<sup>23</sup> <https://www.tcpa.org.uk/tcpa-pgs-guide-9-stewardship>

uses and activities including nature reserves and providing effective connections into adjacent countryside;’ add ‘on all sides of the site including footpaths to the east’.

- We support the related Policy 20 that the Salt Cross neighbourhood centres should include shared working spaces to support small enterprises and reduce the environmental, family and social costs of journeys to work and more rigour is needed to ensure this is achieved.
- The location and design of the school needs further attention.

### **Policy 29 – Design Requirements**

In the first point under design (11.46), the AAP recognises that locals want ‘something more bold and innovative’ than business as usual; we expect exceptional design in this exemplar Garden Village. Yet the Policy contains none of the measures needed to secure and assess this or ‘overall continuity of design’ mentioned in Policy 29 . There is no mention of continuing Design Review, named architects or competitions. Such issues were key to securing design excellence at developments such as Eddington, Cambridge, with its impressive, innovative and award winning community building (Storey’s Feld Centre), which was visited during consultation.<sup>24</sup> One of the measures of success on page 184 is design awards and surely the exemplar village of Salt Cross should aim to win awards- but we do not see the measures that will make this a real possibility. Key outputs (page 8 ) include ‘A new primary school and a new secondary school intended as a ‘satellite’ for Bartholomew School in Eynsham, both forming key landmarks within the garden village through the use of high quality design and materials.’ But how will this high quality be achieved through the OCC process?

60/25

**Suggestion:** we strongly recommend adding a requirement for continuity through design review, use of named architects and landscape architects and support for design competitions, including the design of the landmark schools.

### **Policy 30 – Provision of supporting infrastructure**

This is a top issue for the community. The Infrastructure Delivery Plan (IDP) is good but only a ‘valuable starting point’(11.74) and a lot of further work is required. The AAP correctly notes that ‘...requirements identified in the IDP are a result of ‘cumulative’ growth in the Eynsham area’ (11.70): indeed: this is one of the few documents that fully acknowledges this fact. ‘Timely’ provision’ is key. For example, foul drainage causes regular problems in Eynsham and we note that Thames Water has objected to the Outline Planning Application. The transport problems are well known.

60/26

### **Policy 31 – Long-term maintenance and stewardship**

This is a crucial issue and central to the Garden Cities and garden village vision. Yet although good examples are given the Policy is broad and imprecise and it needs greater clarity to be sound and effective. It is telling that the primary TCPA garden city principles of Land value capture for the benefit of the community, and Community ownership of land and long-term stewardship of assets are only addressed in the final policy. Significant community ownership is the key to empowering people to engage with the creation of a successful garden village. We welcome the Collaborative Housing Report<sup>25</sup> and steps are underway to establish a Community Land Trust for Salt Cross, together with community housing. The CLT would ideally own a range of assets including shops, pubs, business space, leisure and amenity space and manage community owned assets which in turn bring in an income, as in the original Carden Cities. The CLT could include a community energy services company (which links well with the Project LEO Eynsham Smart and Fair Futures energy

60/27

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<sup>24</sup> <https://eddington-cambridge.co.uk/news-and-updates/storeys-field-centre-double-win-at-aj-architecture-awards-2018>

<sup>25</sup> Collaborative Housing, *Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village* June 2002

project).

### Suggestions

Add to Policy 31 'facilitate the objectives of the emerging Community Land Trust and wide community ownership of assets'.

Measures of success (page 184 and Section 12)- should include extent of community ownership and amount of community facilities.

## The Delivery and Monitoring Framework

This new section (12) is key to achieving the aspirations set out in the preceding Policies. In EPIC/GreenTEA's previous response we stated that 'The AAP should be enhanced by addition of specific lower level policies, preferably defined by *numerical or measurable criteria*, that can be clearly measured on the ground, thereby enabling full implementation of the AAP's good intentions'. We consider that this aim has been only partially met, for instance in respect of Policy 2 (net zero carbon development) where 'KPIs aligning with net-zero carbon development, and five-year post-construction energy monitoring, required as condition'. Other policy areas are less precise. We have suggested above some areas for greater precision of measures of success.

60/28

To be effective, we suggest more quantified and qualitative measures of success and failure (rather than simple yes/no), a timescale and details of how this process will be resourced, monitored and enforced over time. There is an assumption in the Framework that everything will automatically be successful, but a column could be added that would indicate how failure will be identified, addressed and rectified.

We hope you find our response both supportive of the plan and constructive in relation to improvements.

Yours sincerely,

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