The Eynsham Society

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

This is the response of the Eynsham Society to the above document. The Society is a local amenity and conservation group comprising some 120 members.

The Society has consistently opposed the "Garden Village" project because it is far too close to the existing village and threatens to overwhelm its resources, particularly in the early stages of development. Notably, the project fails three of the original criteria for seed funding: it is not geographically isolated, is not self-sufficient, and does not have local support. Given that the Expression of Interest application was deliberately concealed from the village until it was too late to object, and that the project was included in the Local Plan in the teeth of local opposition, it has no democratic legitimacy.

Nevertheless, groups and individuals in Eynsham have engaged with the lengthy design process, with the intention of mitigating the damage to the environment and to Eynsham village: if the project must go ahead, it should be an exemplar of sustainable development aimed at achieving Net Zero carbon footprint. The agreed Area Action Plan reflected this.

The Inspectors quite reasonably suspended the EIP because the plans included no phasing details. This was inexcusable, given the initial dependence on Eynsham for all resources (schools, shops, churches, medical services etc.), but was largely rectified by the AV36 Phasing Report (though this still included no plans for medical services).

Villagers were therefore appalled to discover that the Inspectors had modified the AAP (CD7 Schedule of Proposed Main Modifications) to remove (or water down to the point of uselessness) all requirements for sustainability and carbon reduction. This is an intolerable and inexcusable betrayal of trust, and has generated considerable anger in the village. It negates at a stroke the many hours spent by local groups and individuals to ensure that the "Garden Village" would be built to high environmental standards. By replacing firm requirements with weasel words such as "wherever possible", the Inspectors have ensured that "Salt Cross" will be just another large housing estate designed to maximise profit for the developers and landowners (who include Oxfordshire County Council).

Specifically, MM2/Core Objective GV3 and MM4/Policy 2 – Net Zero Carbon Development have been weakened so as to be pointless. This is inconsistent with NPPF reference to "radical reductions" in carbon emissions "in line" with the Climate Change Act 2008, which requires 80% carbon reduction by 2035 and net zero by 2050. No adequate reason has been given for the changes, and as a result we consider the changes, and hence the entire Action Plan, to be unsound.

Other changes which we consider to be unsound include:

MM5/Policy 3 - Towards 'Zero Waste' Through the Circular Economy. "Practicable" is undefined; hence this change makes the provision unenforceable. This is unsound.

- MM12/Policy 7 Green Infrastructure. "Building with Nature" standards been removed and private gardens (which may be later built on) have been included in the 50% green infrastructure. This is unsound.
- MM24/Policy 14 Active and Healthy Travel. The only required crossing of the A40 is the proposed underpass "...unless it...cannot be delivered due to technical feasibility". This is likely to be the case as it will flood unless placed well to the west of the desire line, so in fact there could be no improved crossings at all. This is unacceptable and unsound. In fact, an underpass is likely to be unpopular, and there must be provision for other types of crossing, e.g. a pedestrian/cycle bridge with ramps, and the original specifications for crossings should be restored. In addition, the AAP fails to make any adequate provision for north-south travel by those who are incapable of walking or cycling. In any case, the spine road should actively avoid, rather than "minimise" (another weasel word) severance of the site.
- MM29/Policy 20 Homeworking. There can be no justification "on the grounds of technical feasibility" for failure to provide FTTP broadband on a new-build site. If it cannot be provided, the village is in the wrong place and should not be built at all. This is another example of weasel words used to render a requirement toothless, and hence is unsound.
- **MM35/Policy 22 Housing Delivery**. Removing the requirement for exemplary design standards nullifies the purpose of an "exemplar" development and is hence unsound.
- MM54/Policy 30 Provision of Supporting Infrastructure. The new paragraph is so
 vague as to be almost meaningless, but it appears to provide an opportunity for
 developers to ignore all the requirements of the AAP. It is therefore unsound.

We strongly urge that the unsound changes be dropped and the original wording restored in full.

Yours sincerely,

(signed)

Jolyon Cox Hon Sec., The Eynsham Society