

Salt Cross net zero standards - briefing – 28 June 2022

Planning background

- There was fierce local resistance to the site allocation in the WODC Local Plan – people felt dumped on with 2200 new homes for Oxford’s ‘unmet need’ in the garden village to the north and another 1000 in West Eynsham. Eynsham recognised the need for housing. The draft Eynsham Neighbourhood Plan included three times as many homes as the 250 required at the time, but no one anticipated 3200.
- The garden village was part of the government’s garden village programme so should follow [TCPA Garden City principles](#) - we argued that it was impossible to achieve many of these in this location- eg sustainable transport (it will be largely dependent on the A40 and on the back of this the A40 will be widened for cars, as well as a partial bus lane), biodiversity (it is already an important site with ground nesting birds, rare arable plants, organic management, huge hedgerows etc and adjoins a site of European importance) and community ownership (*‘Land value capture for the benefit of the community’*; it’s a commercial development for a consortium of private owners, Corpus Christi and Oxfordshire CC) and also as it will not be standalone as a garden village should be - it is an extension of Eynsham, and will share facilities eg secondary education and GP access - but separated by the A40, which *might*, be crossed with an inconveniently located underpass, which remains unfunded).
- We lost the arguments, so some of us in GreenTEA (Transition Eynsham Area) and EPIC (Eynsham Planning Improvement Campaign) decided that if it was to go ahead it should be the best it could be, an inspiring example of zero carbon construction. One garden city/village principle which could be met was ***‘Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience’***.
- We were pleased when WODC took on the net zero challenge, appointed a very good Climate Change Manager who commissioned Elementa to produce a report: [Assessing the Trajectory for Net-Zero Buildings for the Oxfordshire Cotswolds Garden Village](#) led by [LETI](#) founder Clara Bagenal George. The standards were included in the AAP.

Area Action Plan

- The Area Action Plan (AAP) is the planning document giving detailed standards and guidance- it can exceed Local Plan standards and is legally binding. Draft completed August 2020. We were closely involved in consultation and were pleased that much we had been pushing for was included- much of it word for word.
- The AAP says ***‘With 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.’*** [My emphasis]
‘.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’. [My emphasis]
- The AAP was held up at online meetings and conferences as an exemplar for net zero development.

- We submitted a great deal of evidence supporting standards on net zero fabric, renewables, reduction in car use, community ownership and management, biodiversity etc.
- We attended inspection hearings in June- July 2021.
- **In May 2022 the inspector sent the main modifications he required**



[INSP 17 Letter to Council Re Main Modifications - pdf - 137 Kb](#)



[INSP 18 Main Modifications Required - pdf - 229 Kb](#)

- **He required the detailed standards for Net Zero Carbon Development to be removed.**
His covering letter said *'we anticipate that our conclusions in relation to Policy 2 (Net Zero Carbon Development) will come as a disappointment. As such, we will say at this stage that we are not satisfied that Policy 2 is either consistent with national policy or justified. As such, we are unable to conclude that the policy is sound. Our fuller reasoning on this matter will be set out in our report. ...We are not inviting or expecting comments on the document we have produced.*
- 25% Biodiversity Net Gain has remained although the Inspector says it should be achieved on site which is an almost certainly impossible task on this site. There is a general watering down of standards—many policies rewritten as 'guidance' or 'consideration of' rather than requirements; a reduction of evidence required, especially at outline planning; reduction in requirements for self build, specialist housing (and wheelchair access), some aspects of biodiversity, removal of key principles and removal of mention of a Garden Village Trust.
- WODC has new leadership. We met 2 councillors including Andrew Prosser, new Cabinet member for Climate Change, Green Party. They say that the Council is unable to challenge the modifications, that they have a binary choice - either to accept them or to discard the AAP entirely. They did not seem willing to go further on this.
- We were told that the AAP could set standards higher than the minimum required but this does not seem to be the case here.
- We also understood that currently local authorities have the power to require higher standards than required by current regulations, although the government had proposed in the Future Homes Standard Consultation that it would amend the Planning and Energy Act to strip local authorities of their ability to set stretching and locally applicable targets; this proposal was scrapped in January 2021.

Links to Eynsham's Zero Carbon Energy Action Plan (ZCEAP)

- Determined that the Eynsham area should seize any opportunities from all this development we pushed for more work on energy planning for the whole area - we have been closely involved throughout. Three studies have been undertaken.
- The [Project LEO](#) team wrote an Energy Plan for the GV which is part of the AAP evidence.
- Inga Doherty Oxon CC then commissioned EDF Urbanomy (part of Project LEO team) to carry out detailed energy modelling for Salt Cross – based on the AAP net zero standards. It showed that a net zero energy system could be achieved if the high fabric efficiency standards were adopted. They gave an online lecture on their work. The Inspector's decision undermines the assumptions which underpin this work.
- Now we are taking this further through the '[Smart and Fair Futures](#) project', with significant public funding. It also part of Project LEO, a major national innovation project involving university, industry and community experts. Our project focuses on future smart green energy and what this means for the consumer. The Eynsham SFF project is a case study, project managed by Barbara Hammond of the Low Carbon Hub and GreenTEA chairs the Local Steering Group. We are working towards a **Zero Carbon Energy Action Plan (ZCEAP)** for the Eynsham primary substation area. This is the first community led Local Area Energy

Plan and it is hoped it will be a model for others. Sadly we have had to reduce construction standards in the plan.

- We are using scenarios from [Pathways to a Zero Carbon Oxfordshire](#) as a basis for modelling the changes needed to achieve net zero targets in 2030 and 2050 - and were aiming for “Oxfordshire leading the way”/”Societal transformation” scenarios but this is now looking more difficult to achieve.
- Oxford University energy experts are appalled by the Inspector’s decision, as is the Project LEO Smart and Fair Futures team. This decision undermines the government funded energy modelling as well as work directly commissioned by WODC.
- The Inspector’s decision also makes it harder to push for higher standards in West Eynsham and elsewhere.
- Meanwhile other developers, such as Blenheim, see the advantages of [net zero carbon development](#) nearby- but WODC is not allowed to require this standard although they are doing this on a small scale on some of their [own land in Chipping Norton](#)).

Publicity so far

- <https://www.witneygazette.co.uk/news/20208715.planning-inspector-makes-no-requirement-garden-village-zero-carbon/> A few misquotes and omissions (eg the ZCEAP), but the gist is OK. Front page Witney Gazette June 15. Also in Oxford Times June 16.
- GreenTEA/EPIC are making contacts and then will plan future action.

It is a huge missed opportunity and a waste of resources- and we know how to do it right - save energy, save money using local green energy and mitigate the climate crisis - and inspire others to do the same.

Please use every opportunity to let people know what is happening, even in an ‘exemplar’ garden village.

Sarah Couch
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