



Garden Village Area Action Plan Consultation: A Response from EPIC and GreenTEA

23 October 2020

This is a fuller version of the community letter prepared by EPIC and GreenTEA to the West Oxfordshire District Council's Garden Village Area Action Plan (AAP) pre submission draft, August 2020. We can see that much of the AAP takes forward our comments on previous stages of the AAP and from extensive consultation. In particular, we 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. As we deal with the pandemic, many are calling for a 'green recovery' which reassesses our connection with the planet in the way we live, travel and work, rather than returning to business as usual. There has never been a better time to take action.

In replying to the consultation we have benefitted from the expertise of the Eynsham Smart and Fair Futures Inspiration Panel who have added examples and evidence, particularly in low carbon construction and renewable energy.¹

We acknowledge that most residents oppose the principle of major development around Eynsham and fear that the quantity of new housing will put unsustainable pressure on overstretched infrastructure. We welcome genuinely affordable housing for recognised local need. However now that the site for the Garden Village is in the adopted Local Plan EPIC and GreenTEA hope that it will be a true exemplar village, demonstrating Garden Village principles and good practice in terms of minimising environmental impact, and excellent place making with high specifications for housing design, meeting zero carbon standards, while providing benefits to the area as a whole. As one of our Inspiration Panel said '*We should be looking to use the Garden Village designation as an opportunity to really showcase exemplar placemaking and sustainable house building*'. We therefore generally support the ambition and policies set out in the Area Action Plan (AAP) pre-submission draft and welcome the 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 which take account of our community's expressed needs for climate action that also enhances biodiversity, health and well-being while protecting the natural landscape.

Overall we consider that the policies are sound: positively prepared, justified and effective- although we do make suggestions to improve effectiveness and we offer some additional evidence. To be effective, several Policies and section 12 Delivery and Monitoring Framework need more quantified

¹ <https://www.lowcarbonhub.org/p/a-smart-and-fair-future-for-eynsham-low-carbon-hub-grants-programme/>

measures of success and failure, a timescale and details of how this process will be resourced and monitored in the long term.

In addition, to improve legibility and navigation, 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.

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 follow this with suggested amendments to improve clarity or effectiveness, or list further supporting evidence.

Part 3 The strategy

5. 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.

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.² 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"³ and the Met Office has just confirmed that 3 October 2020 was the wettest day since records began in 1891 and that future weather extremes are likely to break new records⁴ We need to act now.

It is also important to note that there are many other changes are needed before 2050 to achieve net zero emissions, many outside this project's control, over and above Passivhaus, PV, EVs, buses etc.

Policy 1- Climate Resilience and Adaptation

This is one of the most important goals of the Garden Village which we support with its emphasis in natural capital. Elements of this general policy are covered in further detail in later policies (eg green infrastructure, design principles, water environment, movement and connectivity) which all have an effect on greenhouse gas emissions or sequestration. It is not just woodland that plays a role; there is increasing evidence of the role of soil and meadows, particularly wet meadow in carbon sequestration. We note that in section 5.23 the potential to save costs by reducing pesticide and herbicide use is mentioned. We would like to see a greater ambition embraced: Salt Cross should be designated, from the outset, as a community which is free of pesticide (i.e. insecticide, herbicide, fungicide and rodenticide) use, especially as much of the land is currently farmed organically. This would have many health and ecological benefits and reduce the emissions from chemical inputs. See suggestion under Policy 31 (management) but this should also apply to the clearing and construction phase.

² <https://climate.copernicus.eu/surface-air-temperature-september-2020>

³ <https://earthshotprize.org>

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

⁴ <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/mid-october-statistics>
<https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/sukb-2020-updates>

Suggestions- Policy 1

We suggest that the policy could usefully include cross reference to other related Policies. For instance the reuse of materials in construction or the use of materials derived from waste are part of natural capital and also reduce embodied energy.

5.24- **omit** reference to wood fuel, which is not now considered a zero carbon resource: it would require an increase in forested area to be climate neutral in the longer term and also emits particulates which damage health.⁵

Add that undisturbed soil, grassland and particularly wet meadow also store carbon.

Add that Salt Cross will be a pesticide free community from construction to completion (cross refer Policy 9 and Policy 31).

Evidence

*'In most UK towns and cities it is currently impossible to avoid exposure to pesticides. However, a growing number of places around the world have already gone pesticide-free and are proving that it can be done. Urban pesticides are unnecessary and should be banned immediately in order to protect human health and the environment.'*⁶ Bans or phase-out commitments have already been made in 32 communities in the UK.⁷

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 survey⁸ 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.⁹ This guide 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. Reduction in embodied carbon will become more important (as a proportion of emissions) as the grid decarbonises and operational energy use is lower. High fabric standards also have an important role in reducing the cooling needed in a warming climate. We support the principle that renewable energy should mean new provision, ideally on site (rather than a green tariff for example) and that a range of renewable technologies should be provided to all residential and non residential buildings. In this respect the required viability assessment will need thorough scrutiny and challenge, especially if left to reserved matters stage and take account of the opportunities for Eynsham identified under Project LEO (see further detail below).

In terms of climate action, the case for maximising generation of renewable energy is clear; producing This exemplar development cannot wait for the expected decarbonisation of the national grid: every opportunity must be taken to produce zero carbon energy. There will be sectors in our economy that will struggle to become net zero, such as manufacturing, steel production etc., as well as existing

⁵ <https://www.fern.org/publications-insight/burning-trees-for-energy-is-no-solution-to-climate-change-340/>

⁶ <https://www.pan-uk.org/pesticide-free/>

⁷ <https://www.pan-uk.org/pesticide-free-towns-success-stories/>

⁸ <https://www.westoxon.gov.uk/environment/climate-action/climate-action-and-what-we-are-doing/>

⁹ <https://www.leti.london/cedg> The free guide has already been downloaded more than 15,000 times. See also UK Green Building Council Policy Playbook <https://www.ukgbc.org/wp-content/uploads/2020/03/The-Policy-Playbook-v.1.5-March-2020.pdf>

buildings with poor energy performance, which are difficult to upgrade. This means that where renewable energy can be generated and used on site, such as the case of rooftop solar PV in the garden village amongst other technologies, it must be maximised.¹⁰ Further, the electricity load from the no-gas development will be higher relative to older development (using gas for heating), so every attempt should be taken to offset this load, by increasing renewables, reducing demand and providing assurance to homeowners that even though their heating is powered by electricity their energy bills will not be high. As we move towards greater use of electricity for heat and transport, general electricity demand will increase, and we need to take every opportunity to increase clean energy supply.

Policy 2 also 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 1st 2020 that "We will build environmentally-friendly homes that will not need to be expensively retrofitted in the future..."¹¹ It also future proofs the development against weather extremes such as overheating. These extremes are an increasing risk, as highlighted by a Met Office Report on 22 October 2020; any new data should be used in modelling.¹²

Many garden villages have excellent aims but struggle to reach the exemplary zero carbon standards set out in the Salt Cross AAP. We consider that Eynsham is particularly well placed to achieve net zero carbon objectives and to become an inspirational exemplar in the use of smart energy. Many elements are in place: a committed community, an excellent Oxfordshire community energy CIC in the pioneering Low Carbon Hub¹³, a supportive District Council, the expertise and research excellence of the Oxford Universities, world leading research and local businesses such as Siemens developing smart control technologies - plus the Garden Village which should be zero carbon energy positive. This offers the one-time opportunity to incorporate the optimum features and layouts for zero carbon and for integration with an existing community and make the best use of the proposed smart energy hub and other potential at the adjacent the park and ride. We are fortunate these skills are brought together under Project LEO (Local Energy Oxfordshire) '*one of the most ambitious, wide-ranging, innovative, and holistic smart grid trials ever conducted in the UK*' funded by Innovate UK¹⁴ and that the Eynsham area is now a Project LEO Smart and Fair Neighbourhood project. The Low Carbon Hub has been highly effective in delivering community renewables at scale: their installations currently generate 4MWp and this is predicted to increase to nearly 30MWp in three years.¹⁵ GreenTEA has a long working relationship with the Low Carbon Hub and Eynsham hosted their first community owned PV installations as part of the Peoples' Power Station: we are very keen for this concept of clean energy for community benefit to be extended in any new development.

Project LEO brings significant resources and skills to help make this vision a reality. Transition Eynsham Area (GreenTEA)¹⁶ has been active for over 11 years and is working hard to support zero carbon development. We contributed to the Garden Village Energy Plan and lead the local steering group for the Eynsham Smart and Fair Futures Project, along with the Low Carbon Hub, WODC's Climate Change Manager and renewables experts. The project covers Salt Cross but also the surrounding primary distribution area which includes Eynsham Parish (and parts of others). This makes Eynsham the largest Smart and Fair Neighbourhood area in the county and will develop the transition to a smarter, flexible zero carbon electricity system with fair access for households, businesses, and communities to realise the opportunities and benefits it will bring. The main tasks are to develop a Zero Carbon Energy Action

¹⁰ The site is also suitable for technologies that need earth movement to install them such as heat banks, ground source heat pumps and water source heat pumps

¹¹ <https://www.telegraph.co.uk/politics/2020/08/01/radical-necessary-reforms-planning-system-will-get-britain-building/>
However this approach is partly dependent on decarbonising the grid and does not concentrate sufficiently on reducing demand for heating

¹² <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/sukb-2020-updates>

¹³ <https://www.lowcarbonhub.org/> <https://peoplespowerstation.org>

¹⁴ <https://project-leo.co.uk/>

¹⁵ Low Carbon Hub Business Plan 2020-2023

¹⁶ <https://eynsham-pc.gov.uk/org.aspx?n=GreenTEA>

Plan for the whole Eynsham Primary Substation Area; to develop the long-term stewardship proposals; to develop proposals and business models to achieve net zero, including proposals for the development of the Smart Energy Hub; to apply this to the West Eynsham Strategic Development Area; to engage with the community and ensure that it benefits from new development and can influence quality of development. Smart systems will mean that the village will send power back the grid through locally generated renewable electricity, home and vehicle batteries: the garden village would be a virtual power plant.

This Energy Action Plan is a testing ground for the Local Area Energy Plans which will be required under RII0-2.¹⁷ The Smart and Fair Futures project has the added advantage of being community led, which will facilitate the social and behavioural change and hence demand management which the National Grid's Future Energy Scenarios acknowledge as a key component of achieving net zero.¹⁸

We conclude that the zero carbon aims of the AAP are sound, exceptionally well supported and achievable.

Suggestions and clarifications- Policy 2

Embodied carbon should be better defined (see below 5.53 definition- eg substitute the LETI Embodied Carbon Primer definition and include UK and non UK emissions.¹⁹ Full life cycle carbon modelling should be required rather than encouraged and some authorities suggest targets should be lower, eg RIBA targets below and suggestions for reducing embodied carbon (eg recycled materials, timber, reduced cement and low CO2 alternatives). Even if buildings are net zero operational carbon with some reduction in embodied carbon (as required by Policy 2) there will certainly be residual emissions which are not covered. The developer should be required to submit calculations of the emissions from the development, both embodied and operational, and to offset / sequester the residual emissions in an approved approach, which could usefully include a contribution to a carbon fund to upgrade the energy performance of existing buildings in Eynsham (see evidence below).

Zero operational carbon balance *'100% of the energy consumption required by buildings on-site should be generated using on-site renewables, for example through Solar PV'* **add** the Energy Strategy should consider existing and emerging technologies including ground source and air source heat-pumps, district heating, solar PV and solar thermal and energy storage.

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'.

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

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

Para 5.40 – this paragraph needs updating. It is true that Eynsham Park and Ride was considered as a Project LEO plug in project, but the timescale for energy elements to become operational is beyond the LEO project. We understand elements such as EV charging, vehicle to grid and solar canopy are still under consideration, so these could be considered legacy projects which will feed into the longer term aim of the Eynsham Energy Action Plan. However please **ADD** the current Project LEO Eynsham Smart and Fair Futures energy project and associated business models and long term stewardship.

In connection with the Smart and Fair Futures project, very much regret the omission of *Preferred Policy Approach 33 – Decentralised, Renewable and*

¹⁷ RII0-2 Business Plan Guidance – Ofgem www.ofgem.gov.uk › system › files › docs › 2019/0

¹⁸ <https://www.nationalgrideso.com/future-energy/future-energy-scenarios>

¹⁹ <https://www.leti.london/ecp>

Low Carbon Energy from the Preferred Options Paper July 2019. *‘To include within the AAP, 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. To also include a requirement to consider as part of Project LEO, the potential for an integrated, low carbon energy system within the garden village and to maximise linkages with existing or proposed renewable and low carbon energy infrastructure in the locality.’*

While we realise that some aspects of renewable energy are covered in Policy 2, but strongly **recommend** that some of this text is inserted in Policy 2 under *Zero operational carbon balance* and supporting text so that the opportunities brought by Project LEO Smart and Fair Futures and the related smart, decentralised, renewable energy systems are realised.

5.66 and Policy 3 – Towards ‘Zero Waste’ Through the Circular Economy

We support the aim of increasing material re-use and recycled materials, which could extend well beyond using aggregate recycled adjacent to the site. This will clearly have a beneficial effect on calculations for embodied energy (required under Policy 2).

Additional evidence

1 Construction

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.²⁰ Stirling Prize winner Goldsmith Street is a development of 100 Passivhaus social homes.²¹ 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.²² We have Oxfordshire Passivhaus expertise too: local contractor Greencore has recently completed 25 passivhaus dwellings, both custom self build and affordable homes at Southmoor. Hook Norton CLT is also planning a development of Passive houses..²³ There are other examples at varying scale of developments exceeding current building regulations at the Beacons in Hemel Hempstead, Gusto Homes, Lincoln and the Wintles, Shropshire.²⁴

Other recent Passivhaus projects include the large University of the West of England (UWE) masterplan of approximately 65,000m² and providing 2250 new student residences. This carbon neutral phased development would become the largest Passivhaus student accommodation in the world, with work on site starting in 2021. Not confined to housing, progress is advancing with St Sidwell’s Point, the UK’s first Passivhaus leisure centre & pool.²⁵

There are many other examples of low energy building in the Low Energy Building Database.²⁶ The ‘groundbreaking exemplary’ Lancaster Cohousing Project (registered in 2006) led the way Passivhaus and is built on ecological values.

²⁰ <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?’

²¹ <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/>

²² <https://leedscitycentre.vision.co.uk/home/south-bank/climate-innovation-district-phase-2> <https://citu.co.uk/>

<https://www.parceirin.co.uk/>

²³ <https://www.greencoreconstruction.co.uk/portfolio/springfield-meadows-southmoor>; <https://www.hn-lc.org.uk/what-were-doing/community-housing>

²⁴ <https://thebeacondevelopment.co.uk/> <https://gustohomes.co.uk/woodlands-edge/>

<http://www.thelivingvillagetrust.com/the-wintles/>

²⁵ <https://www.passivhaustrust.org.uk/news/>

²⁶ <https://www.lowenergybuildings.org.uk/projectbrowser.php>

There are many inspiring examples in Europe; for instance Freiburg, Germany has been a leader since the 1970s in low carbon living and community renewable energy at scale.²⁷

The Passivhaus Trust have much useful guidance which demonstrates the advantages of Passivhaus construction, not least that construction is inspected and monitored, avoiding the construction performance gap. *Passivhaus Costs & Benefits* (October 2019) 'shows that innovation costs associated with early Passivhaus projects are now reducing as the methodology has become more widely adopted. Costs are expected to fall further once the Standard is adopted at scale.' Other relevant recent publications include *Easi Guide to Passivhaus Design* (Levitt Bernstein 2018); *UK Passivhaus and the energy performance gap* (Rachel Mitchell & Sukumar Natarajan, University of Bath October 2020) 'Results conclude that Passivhaus provides a reliable means of obtaining low-energy and low-carbon buildings'; and *Passivhaus the route to zero carbon March 2019*²⁸

Embodied carbon: LETI Embodied Carbon Primer defines embodied carbon as: 'The carbon emissions emitted producing a building's materials, their transport and installation on site as well as their disposal at end of life'.²⁹ The RIBA climate challenge states embodied carbon for domestic buildings should be below 450 kgCO₂e/m² by 2025 and < 300 kgCO₂e/m² by 2030: this is more ambitious than Policy 2.³⁰

The UKGBC does include embodied and operational emissions in its definition of Net Zero.³¹ NB UK Government's Net Zero target only includes emissions made within UK territory and excludes emissions from international shipping and air transport and the production of goods and services that the UK imports from other countries, meaning that imported materials would not be accounted for but are part of the carbon footprint.³²

Energy

We are at a critical time. On 13 October the international Energy Authority reported 'World Energy Outlook 2020 shows how the response to the Covid crisis can reshape the future of energy.'³³ As set out above, 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. As Barbara Hammond CEO of the Low Carbon Hub said at their AGM on 17 October, there is now a consensus on how to achieve a zero carbon energy system - so now is the chance to demonstrate our knowledge. Inspiration also comes from Europe where communities are pioneering energy self-sufficiency projects, shifting from individual buildings to the neighbourhood level.³⁴ Over 100 UK Local Authorities have 'pledged to secure the future for their communities by shifting to 100% clean energy by 2050.'³⁵

Legislation to support the local community energy sector is emerging with the Local Electricity Bill making encouraging progress on 14th October 2020. An extremely well-attended House of Commons 'Adjournment Debate' demonstrated strong cross-party support and enthusiasm for the Bill. Power for People explains: 'the rules that govern our energy system were devised in the 1990s and are, as the Energy Minister agreed on Wednesday night, no longer fit-for-purpose. By reforming these rules and

²⁷ https://www.c40.org/case_studies/freiburg-an-inspirational-city-powered-by-solar-where-a-third-of-all-journeys-are-by-bike

²⁸ <https://www.passivhaustrust.org.uk/guidance.php>

²⁹ <https://www.leti.london/ecp>

³⁰ <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/>

³¹ https://www.ukgbc.org/wp-content/uploads/2020/09/Building-the-Case-for-Net-Zero_UKGBC.pdf

³² <https://www.ons.gov.uk/economy/environmentalaccounts/articles/netzeroandthedifferentofficialmeasuresoftheuksgreenhousegasemissions/2019-07-24>

³³ <https://www.iea.org/news/world-energy-outlook-2020-shows-how-the-response-to-the-covid-crisis-can-reshape-the-future-of-energy>

³⁴ <https://ec.europa.eu/jrc/en/news/nearly-zero-energy-buildings-net-zero-energy-districts>

³⁵ Over 100 Local Authorities have "pledged to secure the future for their communities by shifting to 100% clean energy by 2050."

creating a right to local supply, the Local Electricity Bill would unlock the potential for towns, villages and cities everywhere to have renewable energy generation - owned by communities and for the benefit of communities'.³⁶ This is what the Eynsham's community wants and can achieve.

6. Healthy Place Shaping

Introduction

There is evidence that the AAP has attempted to use the Garden City principles in the Healthy Place Shaping core theme as well as relevant national and international policy, principles and research.

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 shaping a healthy place are set out (6.6.) and a new policy for healthy place shaping is being developed in the Oxfordshire Plan 2050 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. It has been assessed against local health challenges, Oxfordshire context/good practice and consultation feedback. This assessment resulted in the Checklist of 10 Healthy Place Shaping Key Principles at Salt Cross (Fig 6.1) upon which this core theme is founded. (It is also relevant to other core themes). This needs to be made clear in the pre-amble as it is confusing because the text around each policy box doesn't necessarily refer to that particular policy box.

We are satisfied that the Healthy Place Shaping core objectives and policies are largely sound. We show why so we would be able to support them, identify areas we consider need improvement and make suggestions for improvement.

Policy 4 - Adopting Healthy Place Shaping Principles

Policy 4 is justified by sound local evidence (community engagement), as well as appropriate national studies and policies. As we recognise the contributions of EPIC and GreenTEA in the local evidence presented and consider the way the Checklist of Key Principles was created is sound, we conclude that Policy 4 is justified. One of the areas needing improvement relates to the fundamentally flawed objectivity on the area's assessed needs in relation to transport infrastructure development. We regard this policy as not fully effective because a high level of air pollution along the A40 is still outstanding. For Policy 4 to be fully effective, joint working with Oxfordshire County Council is necessary to reduce air pollution levels along the A40³⁷ by the time the first residents move in. Also diminishing 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. Absent also, given our Climate and Ecological Emergency and risk of pandemics is becoming

³⁶ <https://powerforpeople.org.uk/> 16 October 2020. UK 100: <https://www.uk100.org/our-members/> includes Oxford but no Oxfordshire districts

³⁷ p54: In relation to the key public health indicators about air pollution, it is stated in this document 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>) where 'Cars will be banished to the very corners of the sites, so the streets can be devoted entirely to people and play spaces.' Such an arrangement for each neighbourhood is surely an effective way to cut air pollution. Policy 11 requires an air quality assessment for the Outline Planning Application (this is included in Grosvenor's Environmental Statement)

more urgent and frequent, health and well-being will need to be considered carefully throughout the AAP. Homeworking is included in Policy 19, but there are no targets or measurements included.

We welcome your inclusion of shared public space for home-workers to meet for support and sharing of knowledge and expertise (6.25), so we think you might like to consider an even more radical approach to the public realm³⁸ in the village centre, features of which already exist in Eynsham and make the village 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.

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. In addition, Oxfordshire County Council's Street Design Guide will be used. Safety in the 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 funded community development officer at an early stage is welcome. This policy is considered sound on all counts.

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'.

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 Director of Public Health for Oxfordshire is cited as recognising the positive impact of exercise on mental and physical health especially in open and natural space with trees, woodland and bird song (6.28). Play design principles, set out by Play England, underpin successful play spaces that include the principle of using natural elements and are close to nature. Both sets of principles accord with evidence from the local community 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. We consider the use of these principles therefore as an appropriate strategy for implementing this Policy and conclude that it is sound.

Minor suggestions-Policy 6

p.51 *Core Objective GV6*, health also includes work-related design and opportunities, so we suggest adding to this core objective as follows (in bold):

*To promote healthy and active lifestyles through the provision of generous, high quality green space, safe and convenient opportunities for active travel, the provision of **work**, sports, and recreational facilities and an integrated approach to the location of housing, **work** and economic uses and community/cultural facilities and services.*

³⁸ <https://www.bioregional.com/news-and-opinion/re-imagining-our-high-streets>

p.52 6.2 In addition in the *Introduction*: The places we live and work – the built, natural and social environment – have a profound impact on our health and well-being.
Policy 6 –add ‘accessible for Active Travel’.

Policy 7 - Green Infrastructure

Overall, we consider Policy 7 to be sound. In terms of assessed need, we are not sure whether the LUC report included this assessment, but there is evidence that the policy has used the Eynsham Neighbourhood Plan, for which there was a very robust community engagement, as well as WODC’s own engagement with communities surrounding Salt Cross.

The policy is consistent with national (e.g., National Policy Planning Framework - 6.36) and international (e.g., World Health Organisation - 6.37) thinking on the importance of delivering environmental and life benefits to local communities (including health and well-being). Green infrastructure is defined as a network of multi-functional green space. 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. It is also recognised that there is a growing body of evidence that supports the positive and measurable impacts of green infrastructure on health and well-being. This was pointed out by EPIC in their 2019 AAP consultation response which suggests that they have listened to our community.

Salt Cross is intended to be an ‘exemplar’ development, so the provision of innovative green infrastructure of the highest quality possible is proposed. We welcome the explicit intention to move away from traditional, ‘grey’ approaches to urban community space and moving towards working in harmony with Nature and the landscape. We are also pleased to see a framework of principles, proposed for the delivery of quality, multifunctional benefits for people and Nature and conditions for flourishing communities. These principles were devised by Building with Nature by bringing together existing guidance and good practice. It is proposed that quality will be measured using the Building with Nature standards (i.e., Well-being, Water and Wildlife -6.44-48), within their accreditation process. We also approve the requirement for Building with Nature’s ‘Excellent’ Award Accreditation and the generation of a comprehensive Community Management and Maintenance Plan.

Given that WODC have persisted with the development of this site, it does appear, in relation to the creation of green infrastructure, that they have listened to EPIC. Here is what we said back in 2018.

‘There is strong evidence from multiple sources in previous consultation and hearing responses that the choice of site for the Garden Village (GV) is deeply flawed. (More recently we have heard that the Oxford Civic Society endorses this conclusion.) WODC has consistently ignored much of this evidence, which must now be fully acknowledged and addressed ... 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 the climate change (EPIC’s consultation response to the WODC’s Issues Paper 2018).

In addition to our concerns raised in the Core Theme, ‘Protecting and enhancing environmental assets’ and in the context of us seeing the value of creating woodlands on the southern boundary of the site to absorb sound and air pollution particulates from traffic on the A40, we cannot imagine that these strips of land along the A40, designated as parkland, will be pleasant for recreational purposes. 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 as included in Policy 7. We also note that historical and cultural landscape references do not include the recent archaeological remains discovered on the south of the site.

On the other hand, we strongly support new woodland creation and scrub (6.55), the multi-functional role of green infrastructure (6.61), biodiversity (6.62) and intention to conserve and reflect local history (6.63). We also 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).

Finally, potential for new woodland creation as a source of renewable low carbon fuel is questionable given the zero carbon aspirations of this development and WODC's declared Climate and Ecological Emergency (See Defra 2017³⁹). Burning wood in a biomass furnace or log burner potentially emits as much, if not more, deadly air pollution, than burning fossil fuels. In addition, it is now widely recognised that dead trees provide nourishment for young saplings and habitats for insects and mammals.

We welcome 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 anticipate that such measures are taken forward in the required Community Management and Maintenance Plan (CMMP) required under Policy 31. We also support Policy 7's requirement for 'An ambitious approach to green and blue infrastructure' as climate sensitive urban design using vegetation and water is good for heat mitigation and sequestration.

Whilst we do think this Policy goes some way towards reducing the inevitable, negative consequences of choosing this site due to biodiversity and A40 issues, we conclude that Policy 7 requires minor adjustment, strengthening and clarification.

Suggestions - Policy 7

However, the following suggestions **in bold** relating to measurement are made to improve Policy 7. A range of qualitative and quantitative tools and techniques will be used to assess green infrastructure proposals, but as with other policies in this section, there is no consideration of quality on delivery or over the many years to come (given that trees and hedgerows take time to grow). This weakness could be partially addressed in the general section, 'Measuring Progress' (p.6-8), by including a general statement about measuring the outcome of development on completion and 5 or more years later to determine quality and fitness for purpose. The measurement indicators (p.51) are too narrow. We suggest adding in the words in bold below. (See also section 12)

*How will we measure success? Indicators to include: Amount of green and **natural** space provided*

- *Types, **use, quality, variety, biodiversity** of different green space provided*
- *Levels/rates of healthy activity, **living and working***
- *Levels/rates of long-term limiting **physical and mental/emotional** illnesses*
- ***Organic food production locally and food miles***

Para 6.55 The aspiration for using new woodland for fuel should be removed completely from the AAP (also p 32, Climate action – at a glance; p253 Opportunities for Salt Cross).

Policy 8 – Enabling Healthy Local Food Choices

This policy draws on evidence reported by the British Medical Association that poor diet, lack of physical exercise and social isolation are major causes of avoidable ill-health. It also makes the link between

³⁹ https://ukair.defra.gov.uk/assets/documents/reports/cat11/1708081027_170807_AQEG_Biomass_report.pdf

enabling people to eat a balanced and healthy diet by ensuring proximity and easy access to affordable, local, healthy food. Thus, the strong community evidence from the Eynsham Neighbourhood Plan and the WODC engagement has been well used and our suggestions of provision of 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. In addition, the likely impact of climate change on food production and supply will result in higher food prices. This means that providing space for residents of the GV to grow their own food is extremely important.

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 and supported by TCPA guidance.⁴⁰ Our suggestion for schools to co-locate with food production has also been taken up. As with Policy 7, Policy 8 requires the demonstration and achievement of high quality through the Building with Nature standards with an 'Excellent' Award Accreditation.

Policy 8 is therefore considered sound as long as the Food Strategy takes account of the ideas in this section and is assessed rigorously. (NB. this is a general point where extra studies are required.)

Suggestion - Policy 8

'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' add 'dispersed community growing spaces'

7. 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. Humans are not privileged as the only living beings who own Salt Cross. The area has been 'owned' by trees, flowers, fruits, nuts and all sorts of bird, e.g. yellow-hammers, once-common but increasingly rare creatures and plants. Essential we restore and enhance nature. Otherwise the huge environmental costs and emissions of building Salt Cross will be contributing to global warming and the demise of the diverse life forms which are co-dependent with us.

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).

⁴⁰ TCPA Guide 10: 'Edible' Garden Cities (2019) There are 13 TCPA guides for garden communities.

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 Eynsham's thriving and expanding Nature Recovery Network ⁴¹which is very active in projects in the area (although Long Mead LWS is mentioned in 7.72) and has worked with Trust for Oxfordshire's Environment (TOE). 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. We also 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**). Currently TOE accepts funds for biodiversity net gain from developers. TOE, takes on the responsibility to create effective long term biodiversity projects to ensure biodiversity units are delivered in priority areas, in a transparent, joined up way. It is important that the net gain funds are spent strategically at the landscape scale, rather than through a piecemeal approach, plot by plot. We also trust that any offsetting will replace the important biodiversity which will be damaged or lost on the site.. For instance we note that the recent Arable Plant Survey (for Grosvenor) identified the site as a whole as of European importance for arable plants. At best after development there will be small and isolated arable planting mitigation areas so we suggest there needs to be meaningful local compensation. The large hedges attracts flocks of yellowhammers and skylarks are a familiar sight and sound; but the hedges will be cut through, habitats will be disturbed and many birds will almost certainly be displaced. As the negative impacts are in our area, we would expect any offsite enhancements to be within Eynsham parish and as close as possible to the site.

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 arguably irreplaceable and form a notable and distinctive feature on this site and provide essential connectivity. Very careful planting and maintenance will be needed to retain or create new hedgerows that link different biodiversity areas, to give a safe movement corridors for wildlife. Much care is needed for subsequent maintenance, pruning, planting into gaps etc to develop a thick wedge of vegetation that will protect wildlife. 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.

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

⁴¹ <https://eynsham-pc.gov.uk/org.aspx?n=Eynshams-Local-Nature-Recovery-Network>

argued that to lose just a little of this national resource is acceptable, but in the long term, every acre counts.

Suggestions- Policy 9

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 rather than an off-site delivery provider); advance tree planting; better protection and enhancement 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 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.

We suggest that these measures are detailed under the requirement for a Biodiversity Mitigation, Compensation, Monitoring and Management Framework and added into Section 12 to ensure compliance. This should also contain a commitment to being pesticide free during construction and future management .

We suggest that the requirement for off-site biodiversity net gain should state *An appropriate financial payment will be sought by the District Council for the delivery of off-site biodiversity net gain (via the Trust for Oxfordshire's Environment (TOE)...* and **ADD 'delivery of Eynsham's Nature Recovery Network.....within the Eynsham area'** and that this sum would be spent strategically at the landscape scale rather than a piecemeal approach.

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. Extremes are an increasing risk, as highlighted by a Met Office Report on 22 October 2020; regular review against latest data and projections will be essential.⁴²

Suggestion- Policy 10

The aims of this policy are good, but to be effective, rigorous implementation of Policy 10's requirement for a flood risk assessment, robust scrutiny of the assessment and regular review against latest data and projections throughout the project 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.

⁴² <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/sukb-2020-updates>

Suggestions- Policy 11

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. The requirement for a Conservation Management Plan is welcome.

Suggestions- Policy 12

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. In addition, the site’s Green Infrastructure- its pattern of fields, settlements, hedgerows and ancient trackways- is part of the heritage and should be included. In Cultural heritage includes the rural, farming and woodland landscape with nearby Pinsey and Vincent bluebell woods and the legacy of ancient and medieval settlements in this part of West Oxfordshire which create a strong and locally rooted sense of place.

8. 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). Provisional figures from the Department for Business Energy and Industrial Strategy issued in June 2020 show that UK transport remains the largest source of greenhouse gas emissions at just under 28 per cent (excluding shipping and aviation and the carbon embodied in imported products) and unlike other sectors such as energy, emissions are hardly falling.⁴³ Therefore the overall strategy of reducing the need for travel, and particularly private vehicles, is sound, as is the support for electric vehicles. The policies are intrinsically sound and consistent and, with a few exceptions noted below, should be supported. We note that Bioregional report’s suggestion to ‘*Consider using carbon offset payments (s106 and/or community infrastructure levy) to enact credible schemes to reduce transport carbon.*’ has not been included in the AAP. Reduction in emissions at source and demand management are the highest priority, but it must be acknowledged that there will be residual emissions. There are conflicting views on offsetting but guidance is available on effective offsetting where all other means have been exhausted. As with all emissions, measurement is key.⁴⁴

The layout and networks of the Garden Village should be designed to be walkable and accessible (Garden Village Core Objectives 17 and 18) and this 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

⁴³ <https://data.gov.uk/dataset/9a1e58e5-d1b6-457d-a414-335ca546d52c/provisional-uk-greenhouse-gas-emissions-national-statistics>

⁴⁴ Oxford offsetting principles <https://www.smithschool.ox.ac.uk/publications/reports/Oxford-Offsetting-Principles-2020.pdf>
Measure- reduce- offset residual Accreditation by eg Verra/Gold Standard (James White Climate Care).

of Salt Cross (6.64 -67); also the provision of cycle parking and relatively low on plot parking provision (Policy 16). We suggest that this measure should be progressive over time.

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.⁴⁵ Bedzed and Lancaster Cohousing Project were early exemplary car free developments.⁴⁶ Yet recent 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.⁴⁷ We need Salt Cross to buck the trend.

West Oxfordshire currently has very poor EV charging infrastructure and we support charging points in public areas (non-allocated spaces) to increase equability and flexibility of use.⁴⁸

We welcome the proposals for travel demand management (8.47 and Policy 16) including appointment of a Travel Plan Co-ordinator and that Policy 16 requires that '*measures should be implemented to encourage sustainable travel, including car sharing*' and that measures '*should include residents of Eynsham Village and the West Eynsham Strategic Development Area.*' We trust that these will be fully followed through, perhaps under the community management model.

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).

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 measured or enforced needs to be determined. (Policy 17:*Permission 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 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

⁴⁵ <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?'

⁴⁶ <https://www.lowenergybuildings.org.uk/viewproject.php?id=325>

⁴⁷ *Garden Villages and Garden Towns: Visions and Reality* <https://www.transportfornewhomes.org.uk/the-project/garden-villages-and-garden-towns/>

⁴⁸ <http://maps.dft.gov.uk/ev-charging-map/> West Oxfordshire is in the bottom 40% of available chargers across the country, with only 19 charging devices per 100,000 population

(8.14-8.17), would they be sufficiently convenient for residents of the two settlements, and 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, crossings, the B4044 community path (Policy 14) the cycle and footpath link to Hanborough Station (Policy 17) and garden village designers should influence their design so that crossings are safe and effective for users including school students and other pedestrians, cyclists, horse riders and the disabled; some uses are incompatible with crossings broken by a small central refuge. Our cyclist members are very concerned that the proposed new signalised crossing near Lower Road (road to Hanborough) will be an inadequate cycling link between the B4044 community path, Salt Cross and the cycle route to the railway station. The underpass is inconvenient, distant from this key route and a second grade separated crossing near the roundabout would be preferable. We note that both the underpass and the bridge near Lower Road scored well in the Mott Macdonald report on A40 crossings, but that OCC chose the underpass option.⁴⁹ Unfortunately this is not the most convenient for pedestrians (including students) or horses, who would naturally cross at Old Witney Road to the Salt Way), nor cyclists from the B4044 path and Eynsham travelling to Hanborough station, as noted in the Mott Macdonald report. Nor will it deliver the desired visual impact or add to the sense of place in the expanded Eynsham, required in 8.38 *Best practice place-making principles must be embedded within the planning and design....* It is therefore essential that if these crossings are signalised, at-grade crossings, they should be well designed, attractive, safe and convenient and add to the sense of place, rather than allowing road transport to dominate. Central refuges must be generous enough to suit all users with sufficient space/width on a safe central island and good approach paths for pedestrians and cyclists. Well designed, attractive and safe design also applies to the underpass. Overall, many think that the County's A40 proposals are inadequate to promote the needed modal shift and some have been pressing for a tram/light railway along the A40.

Suggestions to improve effectiveness - Policy 13

Policy 13 *'Ease of movement: All areas of the Garden Village must be easy to get to and move through for all, and encourage physical activity.'* **add** but vehicle routes should be designed to avoid creating attractive rat runs. Figure 8.1 – Movement and Connectivity Strategy – Key overarching principles. Connectivity within the GV: **add** "walkability" (see above and Neighbourhood Plan) as a key criterion.

Suggestions to improve effectiveness - Policy 14

Policy 14: Pedestrian and cycle crossings on A40; **add** 'of high quality design in terms of surface and detailing to provide well designed, attractive, safe and convenient crossings, wide enough for users including school students and other pedestrians, cyclists, horse riders and the disabled; to link cycle routes, to encourage active travel over driving and to create a sense of place. Existing footpaths should be protected and expanded, keeping their width for people's exercise and enjoyment while protecting and supporting trees and all nature.

Policy 14: Spine road: there is potential conflict between a network design discouraging A 40 use by residents and preventing "rat running" (Bullet points two and three). There must be a through bus route but the spine road proposal needs better explanation and practical design measures to prevent rat running. If practically impossible, bisection of the Spine Road should be implemented at the outset.

Add to this para: crossings for pedestrians and cycles to be surfaced and detailed to reduce perceived road priority.

Policy 14: **add the following:** Hanborough link funded by developer (or cross refer to later provision in the AAP), school travel plan (Policy 16), 30 mph speed limit on A40 next to GV (the 50mph proposed is much too fast), proposed Western Eynsham Extension and Park and Ride.

⁴⁹ Non-motorised crossings of the A40 at Eynsham", Mott Macdonald, April 2020
<https://www.westoxon.gov.uk/media/jvbi1bg2/a40-eynsham-crossings-report.pdf>

Suggestions to improve effectiveness - Policy 16

Policy 16 Travel Demand Management. **Add** requirement for initiatives to be supported by a Travel Plan Co-ordinator.

Suggestions to improve effectiveness - Policy 17

Policy 17 needs (and monitoring page 232) to set out a method to measure impact of the development on surrounding roads otherwise the clause that *'Permission 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'* cannot be implemented.

Policy 17: Additional Highway Infrastructure, see Spine Road comments above.

"Triggers and a long stop" are confusing and should be explained, as should "Change in priority on Cuckoo Lane" and "junction improvement at Pear Tree roundabout".

8.46 The section could include reference to the Project LEO Smart and Fair decentralised grid project in the Eynsham area and proposed Smart Energy Hub (see also comments under Policy 2).

Suggestions for measurements of success (p127) and Section 12 monitoring to include

(Policy 13 page 229) **add** accidents on the internal road and path network and connections to the external highway network;

(Policy 16 page 231) **add** area of car free spaces (satisfying and exceeding Policy requirement) and proportion of dwellings without dedicated off street parking; **add** number of EV charging points in public areas

(Policy 16) : **add** annual review to increase requirement for car free areas and reduction in plots with off street parking as behaviour changes.

(Policy 16) : **add** use of car clubs, car share and bike hire.

(Policy 16) : **add** use of car clubs, car share and bike hire.

Other evidence

Cambridge has just announced £32.5m greenway routes for cycling and walking between Cambridge and villages approved by Greater Cambridge Partnership: this is what is needed here, Oxford is lagging behind.⁵⁰

Utrecht is planning a car free neighbourhood for 12,000 people. *'The new-build Merwede district of 6,000 homes is expected to be serviced by about 20,000 bicycles. Underground garages alongside the "logistical roads" will offer 1,800 parking spaces for those who cannot quit their addiction to the car, equating to one car for every three households. Broekman said he and his collaborators had been inspired by smaller-scale projects in Paris and a 600-home development in Amsterdam's Gemeente Waterleiding district, but that he believed the scale of the project was unique....By having this car-free area, we can design spaces without the straitjacket rules of the car, and thus focus on essentials ...the quality of public space, ...green, biodiversity, climate adaptation and meeting places for social interaction.'* Merwede, a third of whose land is owned by the municipality with the rest belonging to private entities, follows the example of Vauban in Germany (a neighbourhood to the south of Freiburg) which is home to more than 5,000 people.

The Department for Transport (DfT) is fast tracking micro mobility devices and expanding trials of rental e-scooters. E-scooters were given access to roads from on 4 July 2020. The GV transport plan needs to be cognisant of this new form of active travel.⁵¹

⁵⁰ <https://www.cambridgeindependent.co.uk/news/the-32-5m-greenway-routes-for-cycling-and-walking-between-cambridge-and-villages-approved-by-gcp-9126900/> reported 17 October 2020

⁵¹ <https://www.gov.uk/government/news/2-billion-package-to-create-new-era-for-cycling-and-walking>
<https://www.gov.uk/government/publications/e-scooter-trials-guidance-for-local-areas-and-rental-operators/e-scooter-trials-guidance-for-local-areas-and-rental-operators#background>

See the update on the Government's Transport Decarbonisation Plan, released in March 2020, which has the following aims⁵²

- Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network.
- From motorcycles to HGVs, all road vehicles will be zero emission. Technological advances, including new modes of transport and mobility innovation, will change the way vehicles are used.
- Our goods will be delivered through an integrated, efficient and sustainable delivery system.
- Clean, place-based solutions will meet the needs of local people. Changes and leadership at a local level will make an important contribution to reducing national GHG emissions.
- The UK will be an internationally recognised leader in environmentally sustainable, low carbon technology and innovation in transport.

9. 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.

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.

Garden Village Core Objectives 23 and 24 seek a balance of jobs and business spaces in the 40 ha/ 80,000m² 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 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 (Policy 18). 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' and 'high-proportion of home-working'. Examples of enterprise in Letchworth, Welwyn and Milton Keynes have long been 'workshop' and enterprise-based.

⁵²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878642/decarbonising-transport-setting-the-challenge.pdf

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.

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 Ecology⁵³ 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.

Suggestions- general

Add (and cross refer to) measures to achieve net zero and minimise climate impacts of activities on the site.

Suggestions-success indicators and Section 12

P 150 How will we measure success? Indicators to include: Add '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.

Suggestions - Policy 19 Small-scale commercial opportunities and flexible business space and policy 20 Home working

Add 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' and 'high-proportion of home-working'*' to provide dispersed employment, support for small businesses in each neighbourhood and homeworking.

Include these targets and method of measurement and review in **Section 12**.

Suggestions -Policy 21

We suggest the opportunity for onsite fabrication alongside training is added to the Policy 21 as a means of reducing emissions. For example at Leeds Innovation district homes will be manufactured at its purpose-built on-site factory.⁵⁴

Other evidence

The university has given some of its building estate for community workspaces to Makespace Oxford.⁵⁵

⁵³ 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.

⁵⁴ <https://southleedslife.com/citu-creating-climate-innovation-district-hunslet/>

⁵⁵ "The community works": <https://makespaceoxford.org/the-community-works/>

10. 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.

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 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).⁵⁶

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.

Suggestions - Policy 22 and Policy 23

Add 'Tenure blind' to Policy 22 or 23 (only mentioned in policy 24). In Garden City terms, this means it must be people of difference living together: young and old; rich and poor; BAME and white.

Add space standards

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. We welcome the inclusion of affordable housing within this target and we trust that land will be allocated in a flexible way and will be available to groups as well as single plots for self and custom build.

⁵⁶ <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.

We are impressed with the WODC report on Community Land Trust Options⁵⁷ and are keen to explore these ideas further. As evidence of local interest a new group is now emerging supported by Collaborative Housing 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 (see also Policy 31). 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.

Suggestion- Policy 25

We suggest that this policy makes provision for groups of self/custom builders, as well as individuals.

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.⁵⁸ East Cambridgeshire now has 10 CLTs, there is a CLT in the Leeds Innovation district and there are several CLTs in London.⁵⁹ The TCPA guides include one long term stewardship which covers the role of community land trusts.⁶⁰

An early example of co- housing, Lancaster Cohousing Project (registered in 2006) is a Passivhaus, car free affordable community housing project for 41 individual householders. Marmalade Lane in Cambridge is unusual in that it was developer led collective custom build development built by a developer who specialises in co-housing. It has 42 custom build homes shared facilities with shared garden, workshop common house and laundry.⁶¹

⁵⁷ Collaborative Housing, *Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village* June 2002

⁵⁸ Kennett Garden Village (Palace Green Homes)

⁵⁹ <https://www.londonclt.org/>

⁶⁰ <https://www.tcpa.org.uk/tcpa-pgs-guide-9-stewardship>

⁶¹ <https://www.molearchitects.co.uk/projects/housing/k1-cambridge-co-housing/>
<http://www.wearetown.co.uk/marmalade-lane> Town developers of Marmalade Lane and other co-housing schemes
<http://www.wearetown.co.uk/>.

11. 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. It was good to see Ebenezer Howard mentioned given the connection with Eynsham through his descendent who is a member of GreenTEA.

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. We feel strongly that the AAP Policies must rigorously analyse the impact on Eynsham of the GV and West Eynsham as one strategic area. We are to become an unacknowledged New Town.

Suggestions - Policy 27

Add a clause 'to take account of the cumulative impact of development and to complement Eynsham and build on its vibrant community'.

P126 (movement) correctly states that the community says '*Safe and convenient crossing of the A40 is critical to the successful integration of the garden village with Eynsham.*'

We note core objective GV17 *To reduce the overall need to travel outside of the Garden Village by providing a balanced and sustainable mix of uses within Salt Cross so that the majority of everyday needs of all people can be met locally.* This is what the existing settlement achieves so well and one of the reasons it is so successful. GV20 *To provide safe and convenient public transport and active travel connections within Salt Cross and the wider area, in particular to Eynsham, Hanborough Station and the open countryside...*

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 m² of floorspace for culture and the arts and around 1,056 m² for community meeting space, these are not defined in Policy 28.

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 - Policy 28

Layout: We propose that Policy 28 should set aside minimum areas for community and cultural spaces- central gathering places for celebrating, protesting, entertaining, making music etc. , which should include support for home workers in each neighbourhood and ensure there are Public routes where traditions are made (Cross refer Policy 20).

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 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'.

Policy 28: *'The provision of a network of green corridors and spaces 'within' the main areas of development to complement the Country Park including the integration of the Salt Way and Saxon Way as a key component of the design and layout; ADD* 'keeping their width for people's exercise and enjoyment while protecting and supporting trees and all nature'.

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 detailing'.

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 Field Centre), which was visited during consultation.⁶² 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?

We are also very surprised that there is no requirement for a Landscape and Visual Assessment (LVIA). Views are an essential part of our enjoyment of landscape character, and the development will have a major impact on many views within and beyond the site. The value of views are mentioned in Policies 7, 12 and 29, but there is no requirement to map them and assess impacts on them.

Suggestions- Policy 29

We strongly recommend **adding** a requirement to Policy 29 for continuity through design review, use of named architects and landscape architects and support for design competitions, including the design of the landmark schools.

Add requirement for a Landscape and Visual Assessment.

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. We support the emphasis on place-making and

⁶² <https://eddington-cambridge.co.uk/news-and-updates/storeys-field-centre-double-win-at-aj-architecture-awards-2018>

timely provision. '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 and A40 works and crossings will be needed at an early stage. We note *'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'* and are concerned that Eynsham Parish, and the inevitable burden on the existing community and infrastructure should be adequately supported in the absence of CIL payments.

Suggestion- Policy 31

Addto compensate Eynsham Parish in dealing with and the inevitable burden on the existing community and infrastructure.

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. True garden settlements use the increase in land value to meet the up-front and long-term costs of all infrastructure, community facilities and other amenities. In a true garden settlement, a significant share of the land value created is invested in the community itself, providing long-term benefits for all. Garden community developments should be places in which the co-operative spirit is the guiding ethic. The garden community approach offers an opportunity to change a planning culture which is all too often marked by polarised views on all sides, and to develop a genuine sense of shared ownership in the enterprise of building a new community. A dedicated organisation, with the right staff and skills, is essential to oversee the complex task of delivering a new community. Delivery vehicles that commit to high standards and long-term delivery make private and public sector investment an attractive prospect. Such an approach also provides reassurance for local people as it demonstrates a commitment to deliver what is promised.

We therefore welcome the Collaborative Housing Report⁶³ 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, community farms and growing spaces and other amenity space and manage community owned assets which in turn bring in an income, as in the original Garden Cities. The CLT could include a community energy services company (which links well with the Project LEO Eynsham Smart and Fair Futures energy project) and could bring a strong vision, leadership and community engagement and empowerment. The requirement for a Community Management and Maintenance Plan (CMMP) is supported. Although other guidance is referenced, the TCPA 2017 guide is not.⁶⁴ This states *'Long-term stewardship should be a consideration right from the very first stages of planning a new development'* and also *'It should be determined whether there are existing community organisations, such as a community land trust'*: much work is still required secure these core GV aims.

Suggestions - Policy 31

Add to Policy 31 'facilitate the objectives of the emerging Community Land Trust and wide community ownership of assets'.

Cross refer- Policy 16 -appointment of a Travel Plan Co-ordinator and the Community Development Officer (Policy 5).

The objectives in respect of biodiversity, (as well as travel and employment) would be more likely to

⁶³ Collaborative Housing, *Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village* June 2002

⁶⁴ Guide 9: Long-term Stewardship (2017)

succeed through employment of forest garden, travel and community employment assistants - possibly merged into a new profession of garden village enablers, as suggested under travel demand management (8.47 and Policy 16) with appointment of a Travel Plan Co-ordinator or the Community Development Officer (Policy 5).

Add the Community Management and Maintenance Plan must reflect the Policies and aspirations of this AAP, eg climate action, protection of biodiversity and natural capital, banning use of pesticides (only mentioned in 5.23 under natural capital) and other aspirations eg community tree planting, saving acorns etc (6.75, 6.90), organic principles in community food growing etc. We note that the current organic farm on site is not mentioned, but this organic land should be seen as an asset and the quality of land preserved and reused where possible. Cross refer Policy 8 – Enabling healthy local food choices which mentions ‘*a community farm/orchard*’.

NB many of these principles will need to be embedded in the Construction process eg to avoid contamination of organic land with pesticides.

Add links with Community Development Officer, Travel Plan Co-ordinator or other community support staff.

Add the CMMP must be approved and in place before any work starts on site.

Suggestions - Measures of success (page 184 and Section 12)

Should include extent of community ownership and amount of community facilities.

Cross refer to CMMP and other sections eg 6.75 6.90.

Other evidence

The Plunkett Foundation has an excellent track record in supporting co-operative, community-owned facilities, like pubs when the breweries pulled out. They have provided grants to villages to get enterprises up and running all over the country including Oxfordshire. They may still be based in Long Hanborough.

There are good examples of equitable integration in the USA (eg. Newton, Mass) where old people's accommodation and care homes are integrated into community college campuses with the practice of young and old co-mentoring each other, teaching and learning together and offer mutual support. In Salt Cross it's essential that any care homes or sheltered housing is slap bang in the middle of settlements with access of people of all ages. The balance of housing types and community ownership in Milton Keynes is much larger, but it did carefully integrate the original villages into the new town, kept its own resources democratically managed and is a super-vibrant and successful town: from sporting excellence to cultural organisations to bio-diversity, including millions of trees.

Part 4 Measuring Progress

12. 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.

Suggestions- section 12

We have suggested under the themes above some areas for greater precision of measures of success. We note *12.5 The intention is for this progress to be reported through the District Council's annual monitoring report with any significant 'deviation' off-track to be reported as appropriate and addressed*

for example through a partial review of the AAP and/or direct engagement with those bringing the scheme forward 'on the ground' We think that 12.5 should go further. The timescale must allow annual review up to and beyond completion. We trust that there will be provision for standards and targets to be reviewed throughout the lifetime of the project.

Where extra studies are required there must be provision for these to be assessed rigorously, and if necessary, challenge and enforced.

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.

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