

Rosie Morton
Programme Officer
Salt Cross Garden Village Area Action Plan Examination



**Garden Village Area Action Plan AAP examination:
Submission of further evidence from EPIC and GreenTEA**

3 June 2021

General point/Matter 1 Procedural and legal requirements (questions 4–9, Sustainability Appraisal)

Our view is that the draft AAP is broadly sound, and we welcome the zero carbon standards for construction and energy, but there are some areas where policy needs widening and strengthening.

However, if the policies and standards proposed by the AAP are not fully enforced and adhered to, it will not be effective. It is therefore all the more important the AAP's policies and standards are adhered to and not diluted by 'viability' pressures and that cumulative impacts of multiple developments are taken into account. Below we set out recent evidence demonstrating the imperative of upholding and in some cases strengthening the policies and standards in the AAP.

Matter 3 AAP scope, boundary, vision and core themes, and purpose (questions 9–10)

9. *Are the policies flexible enough to respond to different scenarios, for example to manage multiple planning applications for individual parcels of land or situations where sites become available at a later date or to deal with proposals that follow the initial development of the garden village?*

10. *Are the policies intended to apply to all types of development, including minor development, unless indicated in the policy?*

We consider that these are crucial questions as consistent application of AAP standards and co-ordination between phases will be essential to meet site wide policies.

Matter 6 Movement and connectivity (question 1) (Policies 13-17)

OCC's most recent proposals for the A40 'improvements' have some significant changes from the earlier proposals, which require WODC to look again to see what the implications are. The garden village and Eynsham will depend on shared facilities such as the secondary school, accessed across the A40, but many A40 details are unresolved and lack co-ordination. The OCC plans do not include details of the developer funded underpass or access roundabouts (which are still in some doubt) and the staggered Toucan crossings shown are inadequate for the encouragement of active travel. They are much less user-friendly than straight well surfaced crossings for pedestrians and cyclists, and impossible for equestrians. This means that AAP policies such as Policy 14 will be harder to achieve and potential traffic consequences of OCC's Minerals and Waste Strategy if land to the immediate east of Eynsham is exploited for its sand and gravel could exacerbate this.

Matter 7 Net Zero Carbon Development, Green Infrastructure, and Protecting and Enhancing Environmental Assets (Policy 2, question 6, 7,8)

Question 6. Does the policy adopt a clear definition of ‘Net Zero Carbon’?

The UKGBC definition (AAP Figure 5.4) is a sound basis supported by industry professionals; building on this, both evidence and guidance are advancing rapidly. On April 1, 2021 the UKGBC launched new guidance *Advancing Net Zero*. In 2021/22, their programme will accelerate its ambition to lead the UK’s transition to a net zero carbon built environment in the lead up to, and following, COP26 and will strengthen further the UKGBC’s Framework Definition of Net zero carbon buildings.¹

The approach taken in Policy 2 is further strengthened by the publication on 27 May 2021, of LETI’s *Defining and Aligning: Whole Life Carbon & Embodied Carbon* following consultation with industry groups, including CIBSE, RIBA and IStructE.² LETI is made up of construction industry professionals and provided evidence behind AAP ‘net-zero carbon report’.

Question 7. Are the energy efficiency and carbon targets within the policy justified?

Justification of the guiding principle of Climate Change to the AAP is contained in the NPPF revised February 2019 para 148 *Meeting the challenge of climate change, flooding and coastal change*:

148. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.³

In addition to mounting scientific evidence on the need for urgent action and “*radical reductions in greenhouse gas emissions*”, increasingly the public accepts the need to act. This awareness was set out in the Climate Assembly report of September 2020 and is apparent in other instances⁴.

We argue that this is a development that could demonstrate adoption of zero carbon, but only if the AAP standards on climate and biodiversity are upheld and implementation robustly enforced.

We have already endorsed the emphasis on climate change and energy performance standards – see AAP representation no 17/02 EPIC and GreenTEA (23 October 2020). We now stress that the zero

¹ <https://www.ukgbc.org/ukgbc-work/advancing-net-zero/>

² <https://www.leti.london/carbonalignment>

³ <https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change>

⁴ <https://www.climateassembly.uk/>

In a recent trial (23 April 2021) the jurors acquitted, despite judge's direction, defendants who argued that their action was a necessary and “proportionate response to the harm being caused by climate change”.

<https://www.bbc.co.uk/news/uk-england-london-56853979>

<https://www.theguardian.com/environment/2021/apr/23/jury-acquits-extinction-rebellion-protesters-despite-no-defence-in-law>

carbon vision for the Garden Village to be an exemplar would be undermined if key standards are reduced: it is not a pick and mix but depends on a complete and consistent approach. The AAP Vision is: “Salt Cross...will tackle the challenges presented by climate change ‘head-on’ adopting a zero-carbon and natural capital based approach providing a model example of how to plan a new community for the 21st century.”

Since October 2020 there has been further evidence:

Evidence on the urgent need for action mounts daily. As recently as 2 June 2021 the WWF published *Feeling the Heat*⁵. The report sets out the dire consequences of 1.5°C warming and of even more severe impacts of exceeding that target. “As COP26 hosts, the UK government must ensure the global ambition to limit warming to 1.5°C is maintained... 2021 must be a turning point.... What we do in the next decade, starting right now, is vital... Make sure public money is spent on building towards the greener, cleaner future we all want. This must include introducing a ‘net zero test’ requiring the Treasury to measure all future recovery spending plans against the UK’s climate and environment commitments.”

On 18 May 2021 the International Energy Authority launched *Net Zero by 2050*⁶. “Our Roadmap shows the priority actions that are needed today to ensure the opportunity of net-zero emissions by 2050 – narrow but still achievable – is not lost. The scale and speed of the efforts demanded by this critical and formidable goal – our best chance of tackling climate change and limiting global warming to 1.5 °C – make this perhaps the greatest challenge humankind has ever faced”. In the near term, the report describes a net zero pathway that requires the immediate and massive deployment of all available clean and efficient energy technologies.⁷

Prime Minister’s 10 point plan for a Green Industrial Revolution 18 November 2020.⁸ **Climate Change Committee Sixth Carbon Budget** 9 December 2020

“We recommend that the UK sets a Sixth Carbon Budget to require a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990, a 63% reduction from 2019. ... It should be accompanied by a similarly ambitious 2030 pledge, to reduce emissions by at least 68% from 1990... Our recommended budget would achieve well over half of the required emissions reduction to 2050 in the next 15 years (Figure 1). This early action is vital to support the required increase in global ambition, especially ahead of the UK hosting the next UN climate talks (i.e. COP26 in Glasgow). It can feasibly be achieved at low overall cost and would bring multiple benefits and opportunities for the UK.... More than ever before, future emissions reductions will require people to be actively involved... The experience of the UK Climate Assembly shows that if people understand what is needed and why, if they have options and can be involved in decision-making processes, they will support the transition to Net Zero... Fairness is also fundamental to public support and must be embedded throughout policy.

The Government has recognised the need for significant policy strengthening and is developing plans in all areas of UK emissions. Now plans must translate to action and

⁵ <https://www.wwf.org.uk/search/feeling%20the%20heat>

⁶ <https://www.iea.org/reports/net-zero-by-2050>

⁷ <https://www.iea.org/news/pathway-to-critical-and-formidable-goal-of-net-zero-emissions-by-2050-is-narrow-but-brings-huge-benefits-according-to-iea-special-report>

⁸ <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution>

Government must organise for the major delivery challenge of Net Zero. A slower path for emissions reduction, and a looser Sixth Carbon Budget, would put the 2050 Net Zero target at risk and reduce the scope for learning-by-doing.

New economic opportunities would be missed and the UK's role as President of the UN climate talks would be undermined.”⁹

It is significant that the next 15 year is the period of delivery of the development.

Prime Minister's announcement on 20 April 2021 accepted these recommendations

“UK government to set in law world's most ambitious climate change target, cutting emissions by 78% by 2035 compared to 1990 levels

...for the first time, UK's sixth Carbon Budget will incorporate the UK's share of international aviation and shipping emissions

The new target will become enshrined in law by the end of June 2021, with legislation setting out the UK government's commitments laid in Parliament (Wednesday 21 April).”¹⁰

In response: CBI Chief Economist Rain Newton-Smith (an Eynsham resident) said:

“Setting the sixth Carbon Budget in line with the Climate Change Committee recommendations puts the UK on a credible path to achieve its net zero emissions target.

As COP26 hosts, the UK government is leading by example by setting this stretching target. Business stands ready to deliver with the latest low-carbon technologies and innovations that are driving emissions down every year. By tackling this together, we can reap the benefits of transition to a low-carbon economy.

The target emphasises the importance of the 2020s as a decade of delivery on our climate ambitions, and urgent action is needed now to make this a reality.”¹¹

This recognises the need to act in this decade.

In a recent planning appeal, where Swale Borough Council objected to the appellant's inadequate carbon emission specification for the dwellings, the planning inspector commented that *“the climate change emergency is a material consideration and the need for action increases daily. ...the planning regime has a role to play and cannot leave climate change to other regimes.....particularly when those regimes have not kept pace with the requirement to take urgent and material action”*. The Secretary of State agreed that *“the scale and urgency of the climate change emergency is such that tackling climate change is a material consideration to which significant weight should be attached. He further agrees with the Council's representation of 26 November 2020 that the need for housebuilding to become greener, warmer and more energy efficient has become more urgent.”* However in his decision, allowing the appeal, the Secretary of State's justification included the statement that the Council's guidance had not been consulted and that there is no existing or

⁹ <https://www.theccc.org.uk/publication/sixth-carbon-budget>

¹⁰ <https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>

¹¹ Ibid.

emerging LP policy base for proposed conditions.¹² By contrast the AAP has been fully consulted, there is an emerging LP policy base and there is considerable support for the zero carbon policy, which WODC has shown to be viable. In February 2021 WODC passed unanimously approved their Climate Change Strategy with objectives including “taking action locally to accelerate the transition to net-zero carbon as a standard for all new development in West Oxfordshire, working with county and regional partners, landowners, developers and local residents” and “implementing climate policies, including targets for biodiversity net gain and net-zero-carbon development, at Salt Cross Garden Village as a requirement of the Area Action Plan (AAP)”.¹³

As referenced in our AAP representation no 17/04, work is now proceeding on the linked Project LEO¹⁴ Smart and Fair Neighbourhood project which supports the net zero carbon standards of the AAP. This is a national demonstration smart grid project, and as such is a testing ground for future policy and provides opportunities for Salt Cross to become a replicable exemplar development. The highest fabric standards are an essential component of achieving net zero. It is also significant that on 7 May 2021 Oxford University launched its Sustainability Strategy with speakers who emphasised climate and nature positive plans: Oxford University is a LEO partner.¹⁵

AAP representation no 17/04. We requested an amendment to 5.38 and 5.40:

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.*

The lack of skills is frequently quoted as an obstacle. However, industry is now rapidly responding to the need for new skills. For instance, in May 2021 Octopus Energy announced that it was investing £10m to build the UK’s first major training centre for heat pump engineers.¹⁶

¹² https://www.gov.uk/government/publications/recovered-appeal-land-at-south-west-sittingbourne-wiseland-sittingbourne-ref-3233606-29-april-2021?utm_medium=email&utm_campaign=govuk-notifications&utm_source=8d0cc1b5-fd98-43df-b2d1-c708b5285317&utm_content=immediately

¹³ <https://us7.campaign-archive.com/?u=91d9d76e31732b675944c4498&id=40f5fbf123>
<https://www.westoxon.gov.uk/environment/climate-action/climate-change-strategy/>

WODC’s survey on climate issues showed that of 446 responses to the online questionnaire an overwhelming 334 said climate change was a high priority for them. In our own analysis of responses to the garden village Outline Planning Application, although climate change is not an option in the online response, over half mentioned climate issues and c70% the ecological crisis

¹⁴ Local Energy Oxfordshire <https://project-leo.co.uk/>

¹⁵ <https://livestream.com/oxuni/one-event-7th-may/videos/220851509>

¹⁶ <https://heatingnewsjournal.com/half-price-heat-pumps-and-4000-grants-coming-under-plans-to-ban-gas-boilers-by-2025/>

Matter 7 Net Zero Carbon Development, Green Infrastructure, and Protecting and Enhancing Environmental Assets (questions 18–22, biodiversity net gain)

Question 18 (Policy 9) Is the requirement for 25% overall net gain justified and consistent with national policy?

The Dasgupta Review of February 2021 stressed that *“Our economies, livelihoods and well-being all depend on our most precious asset: Nature . . . Our unsustainable engagement with Nature is endangering the prosperity of current and future generations. We need to change how we think, act and measure success . . . Transformative change is possible – we and our descendants deserve nothing less.”*¹⁷

In AAP representation no 17/14 we drew attention to Eynsham’s Nature Recovery Network, which has made great progress in recent months and works with the Trust for Oxfordshire’s Environment, offering opportunities for effective and co-ordinated action within Eynsham parish, which is so severely affected by development.¹⁸ account needs to be taken of the cumulative impact of three major developments (or four, with a new quarry) in a small area on biodiversity and landscape loss and we feel ever more strongly that Policy 9 should require gains to be in our local area creating a continuous network for wildlife.

Matter 7 (Policy 10 water environment) (questions 23–24 flood risk)

Flood risk continues to be an area of increasing local concern given the increasing rate of development in our area and is affected by the cumulative impact, in addition to a large new village on greenfield land, of development of the Park & Ride, A40 dualling and bus lanes, West Eynsham, potential gravel extraction and other permitted development now on site.



Recent events in Eynsham highlight the importance of taking a more serious account of this cumulative impact. In January 2021, the Chil Brook flooded south of Thornbury Green, a new development currently under construction in west Eynsham, despite sustainable drainage systems (SUDS)



having been put in place. Eynsham residents are concerned¹⁹ about this cumulative impact on Eynsham and are increasingly aware that climate change and ecological destruction will influence them personally, as well as nationally and globally. They, and others in villages surrounding the garden village are taking action in response.²⁰ Overall, the AAP requirement to reduce surrounding flood risk is essential given the impacts of climate

¹⁷ <https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>

¹⁸ <https://eynsham-pc.gov.uk/org.aspx?n=Eynshams-Local-Nature-Recovery-Network>

¹⁹ <https://www.facebook.com/groups/eynshamcommunity/permalink/3571400829752652>

²⁰ <https://www.nature-recovery-network.org/>

https://www.hanboroughcommunity.co.uk/HHerald/No_435_April_2021.pdf

change and ecological destruction. Moreover, the Thornbury Green experience suggests that requirements in relation to SUDS may not be effective.

Matter 7 (Policy 10 Water Environment) (question 25)

Have issues relating to water demand, waste water, and water quality been adequately considered and are the policies relating to these issues justified and deliverable?

As stated in our GreenTEA/EPIC response (23/10/20) to AAP Policy 30 (representation 17/32), the provision of supporting infrastructure for water management and foul drainage causes regular problems in Eynsham. We also noted there that Thames Water has objected to the Salt Cross Outline Planning Application. Now, waste and water problems are happening to an extent never seen before.

First, over a number weeks in January 2021, tankers were transporting mixed road drain and sewage water daily, all day, from Stanton Harcourt's to Eynsham's pumping station. This indicates that Eynsham is not the only village south of Salt Cross that has waste and water problems.



Second, a mains pipe with the old system of mixed waste and drain water drainage appears to have collapsed near the centre of Eynsham in Back Lane, causing the [bubbling up of raw sewage](#)²¹ from four manholes in Evans Road for nearly two weeks. This has resulted in daily [stench, flooding and contamination](#)²² in gardens, a drive-way and cul-de-sac through which many children pass to both primary and secondary schools. Thames Water dealt with the issue sporadically and ineffectually, but now, only after bringing in our District and County Councillors personally and taking it to the [Press](#)²³, they are pumping out day and night and digging a four metre hole in Back Lane to investigate the suspected collapse.

In the light of these issues and residents' concern that water management infrastructure, south of Salt Cross, is crumbling, we conclude that the issue of waste water has not yet been adequately considered (see comments on IDP below). This inadequacy is also highlighted by recent research (presented in [Panorama](#)²⁴, April 12th 2021 - 18 mins, 59 secs in) that reveals that Thames Water illegally dumped untreated sewage daily from the Stanton Harcourt sewage plant into a tributary of the Thames, every day for one year, as well as dumping sewage in the Witney overflow.

This inadequacy is admitted by Thames Water who state (in their [response](#)²⁵ to the Pre-Submission Salt Cross Garden Village AAP Consultation) that the infrastructure for waste water treatment is inadequate. They say: 'The scale of development/s in this catchment is likely to require upgrades of both the water supply network and water treatment works.' They warn that 'the housing phasing plan should determine what phasing may be required to ensure development does not outpace

²¹ <https://www.facebook.com/photo/?fbid=314881343599445&set=pcb.3671664493059618>

²² <https://vimeo.com/555573632>

²³ <https://www.oxfordmail.co.uk/news/19336299.sewage-problems-two-weeks-evans-road-eynsham/>

²⁴ <https://www.bbc.co.uk/iplayer/episode/m000vk71/panorama-the-river-pollution-scandal>

²⁵ <https://www.westoxon.gov.uk/media/dawo3o12/area-action-plan-representations-31-60.pdf>

delivery of essential network and treatment upgrades to accommodate future development/s in this catchment.’ Recent drainage work in Eynsham associated with the Thornbury Road development has not appear to have been sufficient.

They also advise that ‘Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development’ and set out how long it will take to address this infrastructure issue, e.g., Sewage Treatment Works upgrades can take 18 months to 3 years to design and build; and construction of a major treatment works extension could take up to ten years. (Is this one of the reasons construction of Salt Cross might not start until 2023/24, according to p. 109 of Aspinall Verdi's viability study, starting with the "business park"? See [Draft Report \[v5\] \(westoxon.gov.uk\)](#))

Therefore Policy 10's requirement for a detailed Flood Risk Assessment and wastewater and water strategy should be strengthened to include the cumulative impacts of development in the parish and wider catchment area with reference to an updated and more detailed Eynsham Area Infrastructure Delivery Plan (IDP).

Matter 9 – Other Policies Policy 30 requires a site-specific IDP should be based on the identified requirements set out in the Eynsham Area Infrastructure Delivery Plan (IDP). However the IDP only deals with this issue at very high level. It acknowledges constraints in the existing sewer system, including Eynsham but does not resolve the issue (5.8.17): *“Initial consultation with the Environment Agency and Thames Water suggests that further discussions will be necessary in the next stages of site-specific IDP work, including joint consideration of the likely development trajectories for the SLG and SDA. This will enable WODC, the promoters, the Environment Agency and Thames Water to establish what sewer upgrades might be required and when they can be implemented. WODC is aware of the need to ensure that there is adequate wastewater infrastructure to serve all proposed new developments within the Study Area. To this end WODC will discuss proposed phasing arrangements with all relevant stakeholders in progressing the AAP and SPD.”*

The IDP states (5.8.16) under waste water *“That initial analysis showed that current projections for development over the Local Plan period can be accommodated within existing permits at all WwTWs with the exception of Cassington.”* It is puzzling that the severe and ongoing problems at Stanton Harcourt (with regular pumping into Eynsham) is not mentioned.

We suggest that this document will need review to provide a more detailed and realistic context for the site specific assessments required by the AAP.

In conclusion we are broadly supportive of the AAP but offer this further evidence to make it more robust in the run up to COP 26.

Key respondents

R A Bovey 5 Chilbridge Road, Eynsham, OX294BE.
Sarah Couch, 74 Acre End Street, Eynsham OX29 4PD
Ros Kent, 12 Abbey Farm Barns, Eynsham OX29 4FA
Nigel Pearce, 1 City Farm, OX29 4YA
Amanda Stibrany, Ardmargha Cottage, Bighthampton, Witney OX29 7QQ
Angie Titchen, 84 Evans Road, Eynsham OX29 4QS