

Salt Cross Garden Village AAP Examination - Request for comments on additional work and note on agreed actions

Comments from Nigel Pearce, 1 City Farm OX29 4YA, 30 March 2022 (incorporating comments from some other members of the community)

A Phasing Report of limited value

AK Urbanism's Phasing Report is notable for what is not in it.

This may be partly due to its being commissioned prematurely, when "the councils and GDL [Grosvenor Developments Ltd] have not yet reached a consensus on a plan that could form the spatial basis for a Detailed Phasing Plan" (paragraph 5.8). I would add that a fully revised masterplan is required, now that Carrington's land has become available; its inclusion could alter both the phasing and the spatial decisions.

A further reason for the unsatisfactory nature of the Report is the deferral of so much, across so many issues, to the Detailed Phasing Plan "and a Spatial Phasing Plan as part of it" (page 4). The Planning Inspector highlighted the need for "an appropriately detailed phasing plan for essential infrastructure". This isn't it. To take just one example of many, the Inspector wanted "wholesale revision" of movement and connectivity policies, but "work ongoing at the time of writing" means that it "is not within the scope of this Report" (paragraph 5.60). This rather beggars belief. At this stage it should have a programme to include these policies.

Furthermore, it is alarming to read (paragraph 2.5) that it is the landowners and promoters who will have "a critical role to play in formulating a Detailed Phasing Plan, albeit subject to the approval of the local planning authority" (almost an afterthought?). West Oxfordshire District Council (WODC) has admitted that it has no control over the delivery trajectory, because it is in the hands of the private sector, and in effect it will have no real control over the phasing either, once its own Phasing Report has been approved. It is therefore vital that as much is settled as possible at this stage, particularly regarding those commitments that the developers and housebuilders are less keen on. Otherwise these will inevitably be downgraded or even fall by the wayside as "viability considerations" intrude into each phase over 14 years of construction – no matter what the Area Action Plan (AAP) says.

A limited remit

AK Urbanism's Phasing Report "only addresses Key Infrastructure types set out in Appendix 5 of the AAP" (paragraph 5.3; they are listed in 3.6). This is an admission that there are other "types" that it does not address. The list in the AAP is closely based on the one in the Eynsham Area Infrastructure Delivery Plan, which was written by . . . AK Urbanism. Unchallenged group-think is the result. However, along the way, the AAP did drop two Key Infrastructure types – Telecommunications and Energy – and they have not reappeared. The absence of Energy is particularly baffling, given all the discussion about a centralised/communal renewable energy network that could also serve a wider area, and zero carbon construction. No milestones for either. So it is not surprising, but deeply disappointing, to find that a word search of the Report yields no mention of "energy", "renewable", "wind", "solar", "climate" or "carbon". The only mention of "power supply" refers to the science park.

Urban bias, rural neglect

It is my understanding that a garden village should be both urban and rural, equally so. The Phasing Report does not reflect this. The clue is in the name of the author, AK Urbanism. AK himself, who appears from Companies House to be the sole employee, is an urban designer. I do not for a moment doubt his experience or competence in his chosen field, but his perspective naturally favours the 'urban' over the 'rural'. As a result, the Report is relentlessly anthropocentric, and where rural-related issues do get some coverage, it is perfunctory or formulaic.

At a time of ecologic emergency, it is unacceptable that nature recovery and biodiversity net gain are not specifically prioritised by AK Urbanism and WODC as Key Infrastructure, not least because TVERC's proposed Nature Recovery Network for Oxfordshire runs through the northern section of the garden village.¹ So again, it is not surprising, but deeply disappointing, to find no mention in the Report of the following: "biodiversity", "net gain", "habitat", "wildlife", "species", "planting", "replanting", "nature recovery" or "nature reserves".

¹ But will this Nature Recovery Network get the same backing from our councils as the Buckinghamshire Council-funded 300km² "huge nature plan [aiming] to save county wildlife" the other side of Oxford (*Oxford Times*, 24 March 2022)? [TVERC = Thames Valley Environmental Records Centre.]

Furthermore, “Green Infrastructure” includes several categories that are not particularly biodiversity-friendly: sports pitches, play areas, amenity green space and even formal parks. Neither is “soft landscaping within commercial developments”. Domestic gardens will have to rely on householders to buy into semi-naturalness rather than just patios and paved areas for their electric cars. Accordingly, it is of little comfort for biodiversity that “the overall green infrastructure network at [Salt Cross Garden Village] will be much more extensive than the minimum quantitative requirements in Table 6.1 [of the AAP] suggest”.² On the contrary, it will be fragmented and much of it rather barren. Natural and semi-natural green space have the most potential for biodiversity net gain, but they need to be connected.

There is no indication in the Report, as there should be, of how and when the goal of 25% biodiversity net gain will be progressively achieved, phase by phase. Instead, we get a bland, all-encompassing statement that “delivery of primary green infrastructure areas tracks residential occupations at or around the proportions implicit in Table 6.1” and will be delivered, proportionally, in all six Stages (paragraph 5.49).

As a way of achieving biodiversity net gain, this is sub-optimal to say the least. From the start of the construction process, there will be considerable destruction of habitat and local ecosystems. Therefore measures to achieve biodiversity net gain right across the site need to be front-loaded in the first phase. They could even start being implemented now, as could the planting of orchards and preparation of allotments. After all, it should be clear where these, and nature reserves and new tree and hedgerow planting are going to be, once the masterplan is signed off. If AK Urbanism and WODC agree with the Inspector “that one of the purposes of the AAP is to provide a policy framework for ensuring that essential infrastructure will be there when it is needed” (paragraph 3.5), then work should start on biodiversity net gain and nature recovery as early as possible. Wildlife needs it now. If these biodiversity measures, and orchards, are not tangibly there from early on, they could easily be downgraded or dropped later for “viability” reasons.

² Appendix 5 from the AAP notes that “these types only represent part of the required green infrastructure network”. So what happened to the other types, such as biodiversity net gain, nature recovery and nature reserves?

To take one small example, how much existing hedgerow will be lost in the first phase to the new junction on Lower Road, the new the cycle path along it, and the spine road? Insofar as it is known where these will be, planting new hedgerow around the junction and spine road, and replacement hedgerow and trees next to the cycle path, could start as soon as construction work allows it, which in some cases could mean before it starts. That way, it could be reasonably well established by the time the first residents move in, and birds, insects and mammals will have more habitat, and sooner, to replace what has been lost.

Further issues and questions

Transport and movement

It is good to read, in EXAM 09 and EXAM 10, references to “the need to avoid unnecessary through-traffic, in particular along the main spine road connecting the A40 and Lower Road”, but how do you define “unnecessary”, and how are you going to avoid it? In any case, the understandable concern about protecting Cuckoo Lane and Freeland from rat-running, and protecting that route for active travel, rather undermines the good intentions for the spine road, because of displacement of the traffic to the latter.

If the vehicles on the A40 from the west that want to join the A4095 are discouraged from turning left at Cuckoo Lane, they will go through the garden village rather than continue on to turn left at Eynsham roundabout, won't they? Likewise, the north-south traffic from the science park and much of the garden village itself. But then it was always OCC's intention to “take traffic off the A40” by redirecting it through the garden village onto Lower Road. Future-proofing the spine road for bisection at a later date was always a promise so vague as to be scarcely credible. So please spell out exactly the categories of traffic that are “unnecessary”. Among other things, you could introduce weight, width and height limits, buses excepted. I note also that Thames Valley Police require Automatic Number-Plate Recognition (ANPR) cameras (Phasing Report, paragraph 5.41); will these be used to identify “unnecessary” traffic?

Since Lower Road will inevitably become much busier than it is already, surely a 40mph speed limit can be imposed now, with a 30mph limit later alongside the garden village, in stage one?

Where precisely will the new Lower Road junction be? The revised version of Grosvenor's Masterplan will need to confirm the location. Will the New Wintles Farm house and outbuildings have to be demolished first? Will it, and the spine road, run close to the Saxon Way, thereby spoiling this essential attractive component of Salt Cross? Where will it sever the Salt Way, thereby degrading that essential attractive component of Salt Cross as well?

I see that "OCC envisages an internal bus service and a service to Hanborough Station commencing when around 1,000 homes are occupied" (paragraph 5.69). Why would you wait until half the garden village has been built and occupied, particularly when residents from Eynsham and elsewhere are also likely to use a service to Hanborough? A distinct lack of ambition. The absence of a regular and frequent bus service will encourage dependence on the private car, a behavioural predisposition that is difficult to change.

It is very strange that the councils have decided not to propose "an indicative trigger point" for the Lower Road/A4095 junction signalisation (paragraph 5.79), when the previous paragraph makes it clear that this junction is already "operating over capacity". Surely it is a stage one, or pre-construction item?

Will a bund be built along the southern edge of the garden village to shield residents from the expanded A40? If so, when?

Education

Shouldn't the underpass be ready before the primary school opens, rather than waiting for the secondary school site to be open to pupils (paragraph 5.86 and Appendix 2)? It will be used by Eynsham primary age pupils as well, won't it?

Where will any primary age children in the first 700 occupied homes be going to primary school before the garden village one opens? Is there capacity in Eynsham? (See Appendices 1 and 2.) The underpass will not necessarily be on the 'desire line' from primary school pupils walking or cycling to the existing Eynsham Primary School before the new one is open in the garden village. Crossing the A40 will be problematic whatever the physical measures provided.

Sewage

Surely you need to decide *now* where “the new strategic pumping station” will be (paragraph 5.98)? How much room will it take up? How much land needs to be clear around it? When will we know that the Cassington sewage works can cope?

Is there just the one pumping station (Phasing Report) or are there four (Revised Cost Plan)? Or is it four plus one? Where will the other ones go and how much land will they need? Shouldn't they precede their respective construction stages?

Will the new gravity sewer be constructed during the A40 works, or will that land along the A40 have to be dug up again at a later date?

Your “working assumption” that “it is not necessary to include references to network reinforcement within the Indicative Phasing Arrangements” is an abdication of responsibility (paragraph 5.100).

Archaeology

Returning to what's missing in the Phasing Report, it is surely important to set out at this point when the archaeological research will be carried out on (a) the deserted medieval village of Tilgarsley, and (b) the Roman remains next to the A40. The latter have been identified by Cotswold Archaeology for the A40 planning application and coincide with Grosvenor's identification of a potential Roman site. It is possible that the Roman evidence extends to beneath Carrington's land, which is now available for the garden village. So that should presumably be explored as well.

In both cases, this is archaeological work that could, and should, defer construction in those particular locations until all the evidence has been unearthed, and should be allocated a time now, to ensure that it features in the Detailed Phasing Plan, in which the developers and landowners will have a “critical role”.

EV38 Revised Cost Plan

It is rather worrying that financial contributions are only “potential” in three important areas: (a) further education, (b) primary health care (see also Phasing Report, paragraph 5.56), and (c) “in respect of net biodiversity gain and protection

and mitigation of impacts on priority habitats, protected and priority species". Why is this, and when will these contributions cease to be only potential?

Page 1: "No allowance for dealing with contaminated material, assume no contamination"? No "ground improvements" either? This is rather curious. What about agricultural contamination at New Wintles and Acre Hill farms? Or contamination in Carrington's brownfield land? Or encroachment on former landfill sites? No cost allowance for either is surely an important omission?

Page 1: What is being referred to by "Existing routes through the Garden Village site upgrades"? Is it just Cuckoo Lane (mentioned separately), or the short stretch of old road in the south east of the site, or are there other existing routes to be upgraded that existing residents should know about?

Page 2: Do the "Pedestrian & Cycle Ways" include the existing footpaths/Public Rights of Way, such as the Salt Way and Saxon Way? If so, the 3-metre-wide footway with 15-metre-wide offset would mean Goodbye Ancient Hedgerows.

Last but not least, why start in the east?

I have read the reasons for starting construction in the east of the site, but counter-arguments are not mentioned, and two of them override the points in favour:

1. Flooding

I do not believe, despite the theoretical work done so far, that you are in a position to know for sure what the implications of later development on higher ground in the west and north will be for fluvial, surface water and groundwater flows and flooding in the east and south, or indeed in Eynsham village. Therefore, it would surely be wiser to start on higher ground.

2. Topsoil, Best and Most Versatile agricultural land, and national food security

If you start in the east, you will irrevocably sanitise the most fertile part of the site. Recent global events, such as Brexit, climate change, the pandemic and the war in Ukraine, have highlighted what we should have seen before: the vital importance of increasing our domestic food production and self-sufficiency. In this context, loss of any BMV land is folly. OK, you assume in the Revised Cost Plan that 30% of the site's topsoil will be stripped, stored and re-used on site. This disregards two

important facts: first, none of the rich topsoil deposited elsewhere on the site will be used for agriculture, although some could be useful for allotments, for example; and second, rich soil is not the best medium for biodiversity-rich habitats, which thrive on poorer soils. It is time to make food production and nature recovery, which can be made to work hand in hand, an absolute priority; our future depends on it.³

³ See, for example, [IPCC AR6 WGII SummaryForPolicymakers.pdf](#).