



EYNSHAM PARISH COUNCIL

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Joan Desmond
West Oxfordshire District Council
Sent via email – joan.desmond@westoxon.gov.uk

22 October 2020

Dear Joan

Application No.	20/01734/OUT
Proposal	Outline application with means of access for a mixed-use Garden Village, comprising residential, retail, food and drink, health and community facilities, hotel, class B1, B2 and B8 employment uses, education provision, burial ground, public open space with sports pitches together with ancillary facilities, landscaping and associated infrastructure and works.
Location	Land North of A40 A40 Section From Barnard Gate To Eynsham Roundabout, Eynsham
EPC Response	Object

Eynsham Parish Council object to this application for the following reasons:-

West Oxfordshire District Council – Garden Village Area Action Plan policies

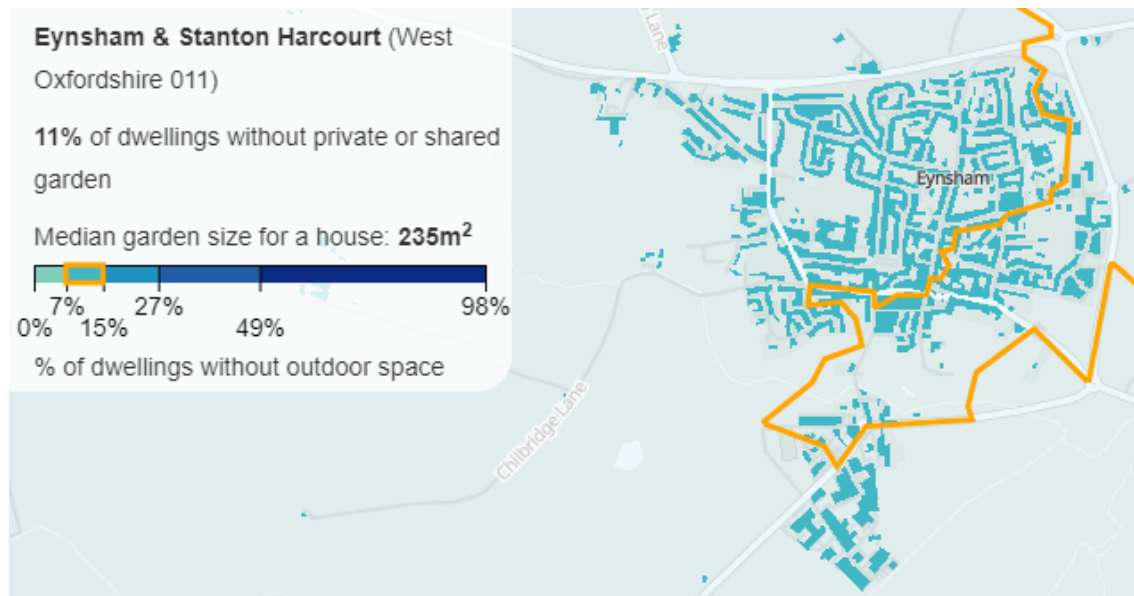
Climate Action

1. Policy 1 - Climate resilience and adaptation
 - 1.1. Climate action should be a key priority (as recognised in draft AAP), whereas it appears low down on the list of issues addressed by Grosvenor in much of the application. Salt Cross should be an exemplar in terms of local energy production as well as its building standards. This is a designated Garden Village which should go well beyond the "bog standard" housing estates which sadly are a familiar feature elsewhere in Oxfordshire and throughout the country as a whole. If development goes ahead, it should have the least possible impact on this planet by providing for 100% of electricity requirements and using onsite zero carbon technologies.
2. Policy 2 - Net-zero carbon development
 - 2.1. No evidence can be found of compliance with this policy. It is felt that 20% of renewable energy generation on site is an unacceptably low minimum target. The Draft AAP says there is a potential for PV panels to meet Salt Cross' electricity demand of 70-100%.

- 2.2. The proposed solar panels could be much less obtrusive. The technology exists.
- 2.3. The use of gas should not be allowed in the settlement or any public buildings. Zero carbon is achievable.
- 2.4. The proposed 25% of houses that should accessible and adaptable should be higher.
- 3. Policy 3 - Towards 'zero-waste' through the circular economy
 - 3.1. There is insufficient evidence that this will be accomplished.

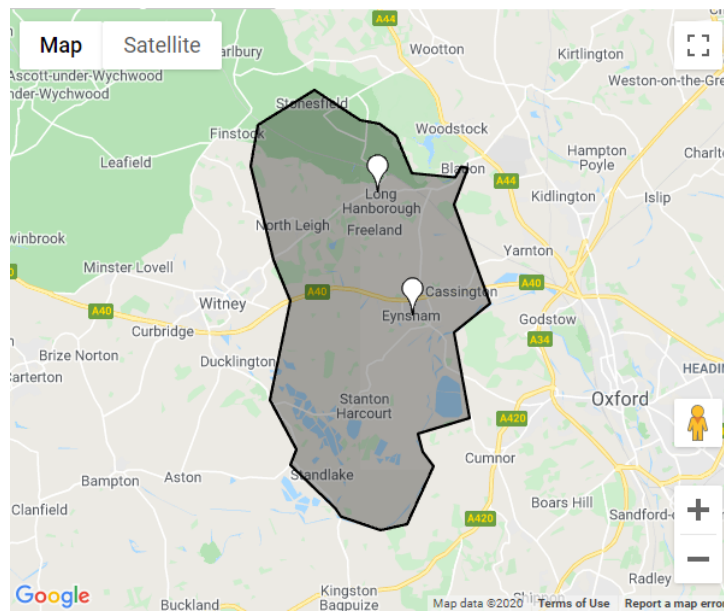
Healthy Place Shaping

- 4. Policy 4 - Adopting healthy place shaping principles
 - 4.1. The proposed gardens do not appear to be large enough to support healthy place shaping principles. We want to see more open space and less density of housing.



(Figure 1 - [Office for National Statistics \(2020\)](#). *One in eight British households has no garden.*)

- 4.2. The Health Impact Assessment needs to cover the whole Eynsham practice area as shown below.



(Figure 2 – [Eynsham Medical Group \(undated\)](#). *Eynsham Practice Boundary map*)

5. Policy 5 - Social Integration, Interaction and Inclusion

No comment.

6. Policy 6 - Providing opportunities for healthy active play, leisure and lifestyles

There is a lack of sporting facilities provided in the application. Play areas appear generous until you compare them to existing provisions in Eynsham. Would like view of Playing Field managers about proposed sports provision. Rugby appears to be getting a poor deal and no cricket provision.

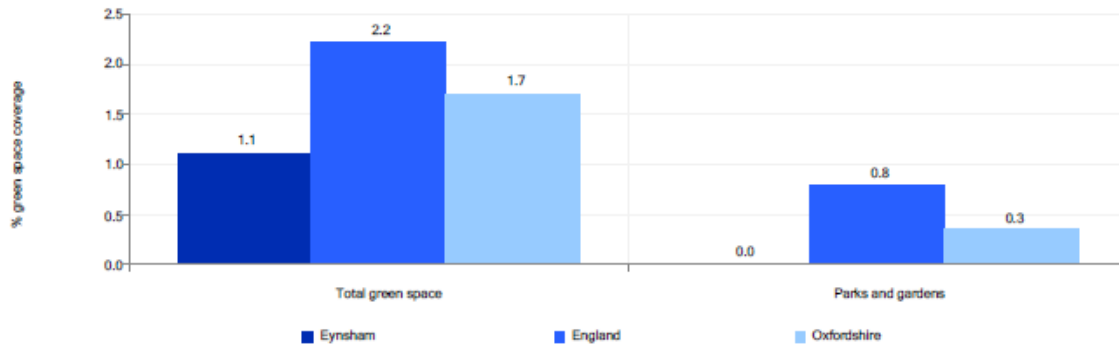
7. Policy 7 - Green Infrastructure

7.1. Eynsham residents will lose their easy access to green areas and local countryside, as well as much of the beauty on the existing footpath network: the masterplan shows the footpaths and bridleways remaining but with high development along them, which goes against the garden village principle of improving the natural environment. The footpaths are very much used and enjoyed; this was particularly evident during the Covid 19 lockdown, which has proved beyond a doubt how immensely valuable the countryside is to people. Developing so close to Eynsham means a great loss of amenity space which Eynsham already has such very little of. As shown below, Eynsham has a total of 1.1% green space available compared to an average of 2.2% in England.¹

¹ OCSI (2020) refers. <http://www.oxford.gov.uk/districtdata/download/downloads/id/1663/eynsham.pdf>

Total green space	Public parks and gardens greenspace
1.1%	0.00%
16.2 hectares (Oxfordshire average = 1.7%)	0.0 hectares (Oxfordshire average = 0.3%)
Source: OS data © Crown copyright and database right 2017	

Figure: Percentage of green space coverage
Source: OS data © Crown copyright and database right 2017



(Figure 3 – [OCSI \(2020\)](#). *Local Insight Profile for Eynsham: Communities and environment - Green space coverage* pg. 65)

7.2. The principle of a discrete garden village is not being adhered to: the houses are too close to the existing A40 and will be seen as part of Eynsham. The existing countryside footpaths should form a protected green corridor. Development should be at a distance, and/or adjacent heights lowered. The damage to the existing rights of way are profound and even after the construction period they will not be pleasant to walk. More work needs to be done in this respect.

7.3. Views are also an essential part of the enjoyment of a landscape which will be detrimentally impacted.

7.4. Green infrastructure and conservation of flora and fauna should not be Reserved Matters.

8. Policy 8 - Enabling healthy local food choices

8.1. Under its' Health Impact Assessment, the application refers to the requirement for healthy eating options, but only addresses it by offering allotments and the possibility that some shops might be farmers market type outlets. In reality, few people are in a position to grow their own food and even if there was a huge move towards growing a meaningful amount of food in this way, the allotment provision would need to increased tenfold to accommodate the need.

8.2. The application should provide more innovative ways of achieving this end. Perhaps a large portion of the employment area would be well utilised if dedicated to market garden type activity providing both healthy local food and the local employment to provide it.

Protecting and Enhancing Environmental Assets

9. Policy 9 - Biodiversity Net Gain

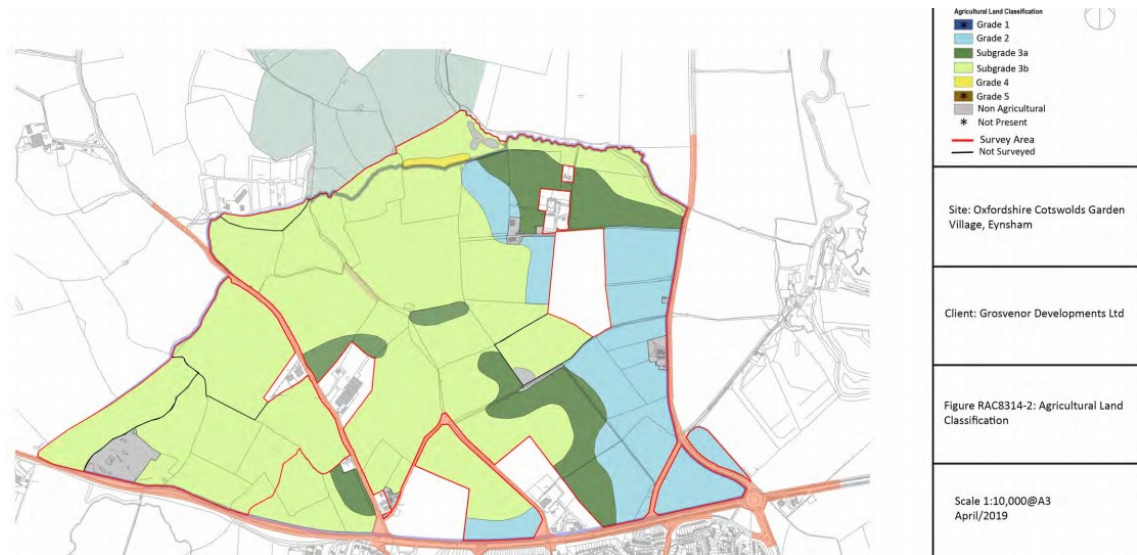
- 9.1. The application fails to meet an overall biodiversity net gain of 25%. Clarification is sought on protecting nature and wildlife during construction e.g. which hedgerows are being kept and which are being replaced (and if the latter, why).
- 9.2. There exists a very rich variety of habitats and their accompanying biodiversity on the garden village site, including rare and endangered species. To lose such valuable land at a time of climate change and fragility of food security is short-sighted, reckless and irresponsible. The application fails to meet an overall biodiversity net gain of 25% (see further details below).
- 9.3. "Net biodiversity gain" is required but there will be major destruction of these habitats and networks which are impossible to compensate by offsite offsetting. The part of Salt Cross to the east of Cuckoo Lane coincides with a large area of Thames Valley Environmental Record's proposed Nature Recovery Network for Oxfordshire. The garden village is also being built over an area of the Wychwood Project, whose purpose is to "conserve and restore the rich mosaic of landscapes and wildlife habitats" of the Royal Forest of Wychwood.
- 9.4. Although acknowledging the high quality of agricultural land, the biodiversity and the importance of natural features, the measures to retain these are nowhere near strong enough. For instance, all mature trees should be regarded as an asset to the landscape and housing, and should be legally protected. The existing old Salt Route and Saxon Way need protection as natural living environments with their current hedgerows in place to maintain their rural feel and existing biodiversity. The drawings in the OPA show all the trees over the site at the same height and in straight lines – not reassuring at all.
- 9.5. How can the very small and isolated 'arable planting mitigation areas' compensate for the loss of arable plants from a site identified in the Arable Plant Survey as "of whole European importance"?

10. Policy 10 - Water environment

- 10.1. All water Infrastructure requirements as listed in Thames Water's response (water, sewage treatment) to be detailed as part of the main outline application and NOT left to be part of the conditions. Whilst a Flood Risk Assessment has been undertaken, detailed information is needed in order to comply with this policy.
- 10.2. The comments around sewage are scant and do not appear to address even the existing issues.
- 10.3. There appears to be no adequate drainage/sewage system yet in the plan – this must be resolved before any planning permission is granted.

11. Policy 11 - Environmental assets

- 11.1. Whilst the majority of the site might be Agricultural Subgrade 3b (moderate quality), when considered in an overall view with its adjoining grade 2 and 3a, the site is still valuable for its soil quality. Building over any of the best and most versatile agricultural land should not be acceptable at all and it is therefore considered contrary to policies.



(Figure 4 - [Grosvenor Developments Ltd \(2020\)](#) – Agricultural Land Classification, pg. 56)

12. Policy 12 - Conserving and enhancing the historic environment of Salt Cross

- 12.1. There are insufficient plans to preserve and enhance the Tilgarsley site and open it for public access.
- 12.2. No regard has been given to the impact of the development on nearby heritage assets such as City Farm and views from Eynsham Hall.

Movement and Connectivity

13. Policy 13 - Movement and Connectivity Key Design Principles

- 13.1. If pedestrian/cycling between the villages is to be encouraged, then pedestrian bridge crossings should also be added; light-controlled crossings will only increase traffic frustrations. A 30mph limit between the ends of the built-up areas would make the links more acceptable and the road less obtrusive.
- 13.2. It is therefore considered that the proposals will not be secure, safe and welcoming for all, especially for the elderly and disabled.

- 13.3. It is an aspiration that Eynsham should benefit from the new garden village, but in fact there is confusion about the connectivity between the existing village and the new development. There is scant evidence of how Eynsham might benefit and the overriding sense is the loss of countryside and the impending problems of heavy traffic congestion, noise, and air pollution. There does not appear to be significant commitment to creating a community that is not designed around car use. There should be restrictions on the amount of parking coupled with high quality alternatives for walking, cycling and shared transport, both within the garden village and outside its wider environs, including Long Hanborough, the outlying villages, and Oxford itself. This is not adequately reflected in the plan.
- 13.4. The issues with the A40 remain and do not appear to have been addressed and in many ways will only be made worse by this application.
- 13.5. The proposed new roundabouts are do not improve the use by cyclists who need to be given priority over traffic entering the site. We would like to see Dutch-style roundabouts.
- 13.6. Crossing the A40 remains a concern and there appears to be no attempt to integrate this with the proposed western development. A further bridge is still needed.
- 13.7. The suggested levels of transport movements appear low and incorrect compared with the number for the 160 houses at Thornbury Green. The proposed employment area is clearly going to attract more traffic.
- 13.8. North Way/Sunderland Avenue



(Figure 5 – [Google \(2020\)](#). North Way/Sunderland Avenue)

Eynsham Parish Council request the section inbetween the garden village and the existing community, to replicate [Northway/Sunderland Avenue, Oxford](#). A 30mph limit between the ends of the built-up areas would make the links more acceptable and the road less obtrusive. With a boulevard-feel of green space, shared users with traffic at a low speed, the feeling will be more of driving through a community space as opposed to simply a commuter highway. The green infrastructure will help with air quality and noise pollution once established. Policy 14 as proposed has no vision, placemaking concepts or principles for this important area between the two communities. High quality, well designed green infrastructure with a long term, viable maintenance plans have not been included in Policy 14. It therefore fails to comply with Eynsham Neighbourhood Plan's policies ENP2, ENP4 and ENP14a and the NPPF.

- 13.9. It is noted that Grosvenor's proposals are already below the local standards and reducing as the development progresses. A controlled parking zone is proposed to minimise on street parking. Given that Salt Cross is in a semi-rural location and that public transport is focussed on Oxford, residents will continue to rely on private car use until other forms of transport are made more attractive. Furthermore, until more attractive forms of transport are available, the appropriate amount of residential parking will be considered too high given the 'green principles' attributed to a garden village status.

14. Policy 14 - Active and Healthy Travel

- 14.1. A second pedestrian/cycle crossing between the Garden Village and Eynsham is required. The Council request a bridge at Eynsham roundabout.
- 14.2. We fully support a 20mph speed limit throughout the Garden Village site.
- 14.3. A clear strategy for school parking and drop off/collections needs to be considered. This is not apparent from the application.
- 14.4. Some of the pathways appear very narrow and would not meet current Covid requirements. Even in the main areas, paths are only 2m wide.
- 14.5. Whilst cycling has priority on some routes this needs to be extended.

15. Policy 15 - Public Transport

- 15.1. It is impossible to judge the merits of the public transport proposals until plans for the A40 Park & Ride are confirmed. We have no faith in the commitment towards public transport proposals other than routes for the centre of Oxford.

16. Policy 16 - Reducing the Overall Need to Travel including by Car

- 16.1. More clarity is needed on Electric Vehicle charging infrastructure.
- 16.2. The number of streets within each area car-free needs to be increased to aid cycling and walking.

- 16.3. The proposed car parking provision raises a number of issues. Unless public transport provision easily allows residents to readily access a variety of destinations, private vehicle use will remain the predominant mode of transport.
- 16.4. Street scene pictures appear to be allowing cars to block pavements.
- 16.5. We would want to have input to the traffic calming proposals.
17. Policy 17 - Road Connectivity and Access
- 17.1. The A40 is queued one way or the other for large portions of the working day. The new development will aggravate this and add over half a mile of traffic to the existing tailbacks for eastbound traffic. A bus lane may help, but most journeys from West Oxfordshire are not to the centre of Oxford so buses are of limited help. Dualling may not be necessary but the junctions at Eynsham must be made free flowing. A 30mph limit between the ends of the built-up areas would make the links more acceptable and the road less obtrusive. The A40 Corridor Scheme will not sufficiently address the Parish Council's concerns.
- 17.2. Road layouts in the Garden Village have been specified, however there has been no consideration as to how the A40 (between the two communities) will be designed during and on completion of the Garden Village. Eynsham Parish Council would like Sunderland Avenue, Oxford to be replicated. This is a boulevard-style with a 30mph speed limit which provides a feel of being part of a residential area.
- 17.3. At least two crossings between Garden Village and Eynsham required. A bridge at Eynsham roundabout is requested.
- 17.4. Traffic problems on the A40 must be resolved before granting permission for yet more housing. In the AAP section on the choice of site for the Garden Village it states that this site would benefit from investment in transport infrastructure to the A40. There has been no investment to date, current plans are totally inadequate and in disarray and the problem of transport remains a serious concern for local residents. The AAP significantly underestimates this concern. The A40 has been a problem for the village for many years and suffers regularly from traffic jams, poor air quality and noise. The most vociferous objections to the garden village have focused around the problems of the A40: building another large housing development on the already overcrowded road (not forgetting more development feeding into the A40 from the west) requires much more radical attention than has been given so far and also reinforces the need for stronger and more imaginative policies to minimise car use and parking in the garden village itself. Building two new roundabouts will make delays worse, and the proposed A40 dualling between Witney and Eynsham will not resolve the problems.
- 17.5. We do not understand how this application can boast that it will benefit from A40 upgrades. Appears to be the opposite.
- 17.6. Car/cycle parking and traffic management are being reserved. Despite claims, cars still seem to have priority, although some of these matters are reserved.

- 17.7. More clarity is required on the “restricted vehicular movement corridor” and its impact on local roads and the A40.

Enterprise, Innovation and Productivity

18. Policy 18 - Salt Cross Science and Technology Park

- 18.1. Initially, residents were told that the new housing was needed for those working in Oxford and for the planned growth thereof. Now we are told we need a business park so that there are local employment opportunities for the new residents. There are already unused spaces on the Business Park in Eynsham and the current proposals are for a huge amount of additional land to go under concrete with very little evidence for its need. The combination of Brexit, the shrinking economy and the changing life and work patterns during and subsequent to Covid 19 means that the existing plans are totally out of date: this may turn out to be an expensive “add-on” which significantly increases the size of the garden village (and consequently the decimation of the land) without offering any benefit to the local community.
- 18.2. The Garden Village is an opportunity to promote very local and flexible ways of working, and could encourage small businesses, self-employment, etc., through shared and flexible working spaces in the centre of the village.

19. Policy 19 - Small-scale commercial opportunities and flexible business space

- 19.1. Confirmation is required that no large retail outlets will be permitted which could threaten viability of Eynsham's existing shops.

20. Policy 20 - Homeworking

- 20.1. The requirement to plan for co-working workspaces should be strengthened. Home working has huge advantages in terms of avoiding travel, but has the disadvantages that all homes are not suitable and generally workers benefit from the company of others. Local, flexible, home working ‘pods’ can achieve the same advantages whilst removing the disadvantages.

21. Policy 21 - Employment, skills and training

No comment.

Meeting Current and Future Housing Needs

22. Policy 22 - Housing Delivery

No comment.

23. Policy 23 - Housing Mix

- 23.1. The wording regarding affordable housing needs to be strengthened and should be above the minimum required of 50%. In addition, clarification of what exactly constitutes affordable.
- 23.2. The AAP aims to ensure that of the 2,200 new homes to be provided at Salt Cross, that these comprise a good, balanced mix of different types, sizes and tenures including 50% affordable housing with an emphasis on genuine affordability, with reference to living rents and realistic affordable purchase prices for the local area. The AAP also supports the provision of 'non-mainstream' forms of housing including at least 5% self/custom build as well as opportunities for various forms of specialist forms of accommodation in accessible locations. These comments are echoed by the Parish Council.

24. Policy 24 - Build to Rent

- 24.1. Inclusion of Social Rent model as part of the Affordable Housing mix.

25. Policy 25 - Custom and Self-Build Housing

- 25.1. We support custom and self-building housing.

26. Policy 26 - Meeting Specialist Housing Needs

- 26.1. Consideration needs to be given for Specialist Housing Needs. Specialist housing accommodation is supported with the particular needs of older persons and people with disabilities taken into consideration in line with ENP1A.
- 26.2. The PC would welcome more clarity with respect to extra care housing which is at a premium in the existing village. ENP Policy 1 includes a description of how the GV is to look and includes mention of extra care housing at B:

"Larger residential developments should include a mix of housing types and tenures to make balanced communities. The ideal community will include a wide range of ages, incomes, education and skills so that the community could be largely self-sustaining. This shall be achieved by:

- A Implementing WOLP Policy H4 with a presumption towards Eynsham's existing housing balance favouring smaller homes for market, affordable and social housing, including starter homes, homes for downsizing typically in the 2 / 3 bed categories and addressing the local need for housing adapted for older residents and those with special needs.
- B Providing affordable housing in accordance with WOLP Policy H3, addressing local need including provision for essential local workers.

- C New residential development designed, where possible to enable residents to walk to key village facilities to maintain the compact, inclusive community nature of the village. Where this is not achievable, proposals should include appropriate mitigation which will ensure integration with the existing village.”

Building a strong, vibrant and sustainable community

27. Policy 27 - Key development principles

- 27.1. It is clear in a number of ways, the Garden Village principles are not being followed. This has been a constant theme throughout meetings since the start and whilst we may have made some progress, there is a long way to go.
- 27.2. It is unclear how housing is designed to promote community cohesion.
- 27.3. The location of the schooling provision still appears to be wrong and is likely to encourage traffic movement. The schools need to have enough parking spaces so that the vehicles don't spill outside as at present.

28. Policy 28 - Land uses and layout – the spatial framework

- 28.1. Whilst the plan is illustrative, we have concerns about access to burial ground as this proposal does not appear to accord with WODC plans.
- 28.2. The attenuation and burial ground should not be included in the 40% open spaces.
- 28.3. Play areas appear generous until you compare them to existing provisions in Eynsham.
- 28.4. Would like the views of our Allotments Group about proposed plot sizes and facilities.
- 28.5. Would like view of Playing Field Managers about proposed sports provision. Rugby appears to be getting a poor deal and no cricket provision.

29. Policy 29 - Design requirements

- 29.1. There is little mention of architectural style in the site wide design code, but page 120 shows an extremely dense concrete paved mews. This is surely not in keeping with a “garden village” scheme.
- 29.2. Salt Cross needs to focus on different kinds of housing to meet different kinds of need. It must comply with the recommendations of the ENP (which, despite excellent detail, is not explicit in the AAP/ OPA). The ENP clearly identifies a range of housing in terms of tenure, design and purpose based on extensive consultation with the local community. **Neither the AAP nor the planning application give adequate recognition to the work done in the creation of the ENP which involved significant consultation with local people.** Reassurance should be given concerning the enforcement mechanisms to hold the builders to these requirements, rather than allowing them to build standard estate housing on the grounds of financial viability.

- 29.3. The evidence of Oxford's unmet housing need is out of date and totally unspecific, and the reality of it should be questioned, as the growth targets for Oxford have been reduced, presumably meaning that fewer houses are in fact needed.
- 29.4. The maximum height of buildings should be 3 storey. According to the Parameter Plan 4: Building Heights, it is proposed to build up to 16m high at the highest point of the Garden Village site. Based on a storey height of c. 4.3m, the proposal will be beyond 3 storey which the Parish Council consider unacceptable; even more so at this particular location. It is impossible to understand how the proposed marker building will emphasise the importance of the landscape on the site – it just appears an opportunity to build a large building.



(Figure 6 – [Grosvenor Developments Ltd \(2020\)](#). *Parameter Plan 4: Building Heights*)

30. Policy 30 - Provision of supporting infrastructure

30.1. More detail is required on local primary medical care and other public services.

31. Policy 31 - Long-term maintenance and stewardship

31.1. The Council support a Community Land Trust.

32. Other comments

32.1. Location - The development is in the wrong place. It is neither separated from Eynsham nor properly joined with Eynsham. The location also distances access to the countryside for the people of Eynsham. Access to open countryside is recognised as important. Currently Eynsham residents can access countryside within several hundred metres – that will become kilometres for many once all the surrounding developments are completed.

- 32.2. S106 Contribution - The Heads of Agreement does not specify amounts but does include a variety of items. Funds towards the burial ground development and the allotments should be included in the agreement. Much more clarity is needed on S106. Suggest an Infrastructure Funding Statement to outline in one place financial details for providing services and infrastructure.
- 32.3. Collaboration - The poor collaboration between Grosvenor and the local authorities has been very worrying throughout this process, with problems arising over shared responsibilities for transport, connectivity, siting of crossings and the school, etc. A further example is that the planning application has been submitted prior to the adoption of the AAP, leading to confusion and extra work for the local community. There is concern at the lack of connectivity with West Eynsham where the existing problems of conflicting visions, devolving of responsibility and minimal collaboration is a recipe for disaster.

33. National Planning Policy Framework 2019

33.1. The application is considered contrary to the following policies:-

33.1.1. Strategic Policy 20 (d).

33.1.2. Conserving and enhancing the natural environment policies 170 (a), (b), (d) and 171.

34. Eynsham Neighbourhood Plan

34.1. The AAP does not comply with the following policies:-

34.1.1. ENP1 Housing

34.1.2. ENP2 Design

34.1.3. ENP3 Community Facilities Including Infrastructure and Utilities.

34.1.4. ENP3 (a) Health Care Facilities

34.1.5. ENP3 (b) Infrastructure and Utilities

34.1.6. ENP3 (c) Education

34.1.7. ENP4 Green Infrastructure – The Setting for New Developments.

34.1.8. ENP4 (a) Enhancing Biodiversity

34.1.9. ENP5 Sustainability: Climate Change

34.1.10. ENP7 Sustainable Transport

34.1.11. ENP8 Connected Place – Integration of New Developments with the Village

34.1.12. ENP9 Parking

34.1.13. ENP10 Building a Strong Sustainable Economy

34.1.14. ENP11 Retail

34.1.15. ENP12 Local Green Spaces

34.1.16. ENP13 Trees

34.1.17. ENP14 Sustainable Growth

34.1.18. ENP14 (a) Strategic Development Area and “Garden Village”

35. Conclusion

- 35.1. The AAP sets some high expectations and standards, but there appears to be insufficient attention given to ensuring these standards are enforced and adhered to. Repeated references to "viability" are not reassuring; likewise, the extensive use of "reserved matters". With existing examples of poor internal standards in Hazeldene, traffic chaos in the building of Thornbury Green and an estate completely devoid of trees, and now a totally dysfunctional approach to West Eynsham, there seems little point in trusting that housebuilders will be held to account.
- 35.2. We are concerned with the volume of issues being left for 'Reserved Matters' and therefore request that West Oxfordshire District Council follow their AAP document and liaise with Councillors as much as possible.
- 35.3. The Garden Village, if built, should be constructed as a post-Covid, 21st Century, full-on and carbon-neutral development; a symbol of hope and a model for very difficult times to come. A huge amount of passionate and knowledgeable community involvement has been evident from Eynsham since the GV was first proposed: it should result in a model of development here.

Yours sincerely



Mrs Katherine Doughty
Clerk to Eynsham Parish Council