



# EYNESHAM PARISH COUNCIL

CLERK: KATHERINE DOUGHTY,  
91 BRIZE NORTON ROAD, MINSTER LOVELL, WITNEY, OXON. OX29 0SG

Telephone: 07956 901622 Email: [epc.clerk@eynsham-pc.gov.uk](mailto:epc.clerk@eynsham-pc.gov.uk) Web: [www.eynsham-pc.gov.uk](http://www.eynsham-pc.gov.uk)

West Oxfordshire District Council  
Planning Policy Manager  
Planning Policy  
Elmfield  
New Yatt Road  
Witney, Oxon. OX28 1PB

Sent by email – [planning.policy@westoxon.gov.uk](mailto:planning.policy@westoxon.gov.uk)

11 October 2019

Dear Mr Hargraves

## **Oxfordshire Cotswolds Garden Village Area Action Plan (AAP) – Preferred Options Consultation Response**

### **Summary**

Eynsham Parish Council wants strong cohesion and integration between the two communities and not an independent ‘them and us’ status. The location of shared amenities will need to be sensitively and carefully considered.

A key aspect of creating a strong cohesion is the ease of access to the communities. The Council request the creation of at least one (green) bridge over the A40 and the A40 length that will run between the 2 communities to have the same feel as that of [Sunderland Avenue, Oxford](#). With tree planting/vegetation, a 30mph speed limit and a broad road expanse, the A40 could be integrated into both communities.

This is the prime opportunity to deliver a West Oxfordshire development to unusually high standards. As such, commitment to achieve this is required in the AAP.

Throughout the AAP document, there are a number of terms that imply too much flexibility. For example, ‘should, propose, anticipate, wherever possible’ – these should be firmed up to say ‘we will’, to actually provide a level of worthy commitment. Should an ‘Action Plan’ really include ‘discussions are ongoing so we are unable to be specific...’? The use of ‘S.M.A.R.T.’ objectives/principles should be used when considering the terminology of the required outcomes rather than the current language that can allow more than one possible outcome.

We also draw to your attention, the proposed Additional Core Objectives (a) to (e) for inclusion in the AAP, contained within the relevant sections.

## Section 5. Building a strong, vibrant and sustainable community

### 1. Core Objective GV1 and Key Development Principles

- 1.1. Eynsham Parish Council recognises that a 'prosperous new rural service centre' is being planned, however it does not consider that the development meets Garden Village principles. ('Proposals can be for a discrete new settlement or take the form of transformational development of an existing settlement, both in nature and in scale.'<sup>1</sup>) It is considered that the proposal does not meet this basic requirement.
- 1.2. We struggle to see how several of the Garden Village principles outlined in figure 2.1 can be guaranteed. For example, there has been much enthusiasm in the consultations for the principle of community ownership, but there is a lack of concrete steps as to how to achieve this. Without this, it's difficult to see any practical mechanism for the worthy principle of 'land capture for the benefit of the community'. In the disappointing absence of any specific proposals for a local community organisation with real powers over the stewardship of assets, the only way to achieve land value capture will be watertight policies in the Area Action Plan that demand the highest of standards and are precise enough to be enforceable.

### 2. Core Objective GV2

- 2.1. GV2 – At 5.15, it feels that the Spatial Framework will ultimately be controlled by the master planning process. This does not support 'strong local visit and meaningful community engagement.'

### 3. Core Objective GV3

- 3.1. Support the objective.

### 4. Core Objective GV4

- 4.1. Social interaction and inclusivity that meets people's everyday needs, complementing the role of nearby centres including Eynsham, is supported. The Garden Village/existing community should be easy to access for all residents.
- 4.2. At 5.1, it is stated that the village will be a separate entity, 'standing on its own two feet.' This feels at odds with Core Objective GV4 where the GV is '...complementing the role of nearby centres including Eynsham.' The District Council is clearly confused in its consideration of how to view the GV and a further example is provided at 5.36. Is it or isn't it a separate entity? It is the Parish Council's view that the proposal does not meet GV principles as stated in point 1. The proposals are clearly muddled between the two aspects.
- 4.3. At 5.19, the Parish Council supports a minimum of one if not two garden bridges linking the site to Eynsham across the A40.

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<sup>1</sup> MHLGC Garden Communities Prospectus August 2018 – section 6.

4.4. At 5.9 and 5.10, it highlights the extremely flimsy approach to significant aspects such as schools, health care and open space provision by stating that 'discussions were ongoing.' Firm proposals should be included in the AAP.

5. Core Objective GV5

5.1. Whilst the sentiments of minimising disruption to residents and ensuring that existing services and facilities are not put under 'unreasonable' strain, this Core Objective wording needs strengthening to support and protect the existing community facilities.

5.2. At 5.43, the location of existing key community services are being questioned. Does the District Council really consider that elderly and infirm residents from the existing community, should access their medical needs solely in the GV?

6. Core Objective GV6

6.1. Whilst it is positive that future maintenance of the GV is being considered at an early stage, it would have been appreciated if the District Council approached ourselves to gauge how our existing community maintenance services might be extended and welcomed in the GV.

## **Section 6. Healthy place shaping**

7. Core Objective GV7

7.1. Whilst the Council supports the objective, it is unclear how exactly the policy will be met and whether it will support one cohesive community or just the GV. See proposed additional Core Objectives (a), (b) and (c).

8. Core Objective GV8

8.1. This policy should also consider the quality of the 'internal environment' people are living in. New homes should be designed and enabled to support independent living including telehealth.<sup>2</sup>

8.2. We would also like to stress the importance of new open spaces for active outdoor recreation, volunteering opportunities, formal and informal events, encouraging people to be active in their community and helping to overcome isolation and loneliness.

9. Core Objective GV9

9.1. Agree that the development should be planned to include spaces where people of all ages can congregate together to promote social cohesion.

10. Core Objective GV10

10.1. It is unclear how the policy will be met. See proposed additional Core Objectives (a), (b) and (c).

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<sup>2</sup> <https://www.ageuk.org.uk/information-advice/care/housing-options/adapting-home/telecare/>

11. Core Objective GV11

11.1. The health and social care infrastructure should be integrated i.e. a single polyclinic facility including all the necessary services and blending physical and mental health together. It should be integrated with the existing facilities in Eynsham and planned as a single model of service delivery. Planning should also allow space in the polyclinic for local voluntary and community groups so it can act as a one stop shop (for example including debt counselling). Ideally the polyclinic would be co-located with sports and leisure facilities to create a seamless join up. This infrastructure would also provide a strong platform for people to manage their own health and care, together with their peers and the voluntary sector, by making the most of mobile and digital channels. The aim must be to avoid time consuming and carbon expensive trips to other healthcare facilities, hence supporting sustainability.

12. Objective GV12

12.1. Support the objective.

Additional Proposed Objectives

- (a) To ensure that local services, infrastructure and the economy through the application of knowledge about what creates good health, improves productivity and benefits the economy, thus providing efficiencies for the tax-payer.
- (b) To adopt an approach that involves local people and organisations in a process of co-production so that all public assets are used to maximum effect.
- (c) To ensure that all residents (existing or new) can benefit in terms of health and wellbeing.

**Section 7. Protecting and enhancing environmental assets**

13. Core Objective GV13

13.1. We fully support the importance given to protecting and enhancing environmental and historic assets.

14. Core Objective GV14

14.1. The Area Action Plan should specify that the Garden Village must strive to achieve the 'Full Award – Excellent' level of accreditation through Building with Nature<sup>3</sup>, and if unsuccessful, improvements to be made until said accreditation is reached.

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<sup>3</sup> <https://www.buildingwithnature.org.uk/about>

- 14.2. The Area Action Plan should also be specific about the minimum percentage gain in biodiversity required within the site (at least 25%), and each individual planning application to be required to make clear how it contributes to that gain. The Green Infrastructure report helpfully lists a number of 'Future Opportunities' in each section which together would enable this goal. Among the opportunities listed there we strongly support connection to wider walking and cycling routes, habitat corridors which link to Conservation Target Areas, community orchard and gardens, a 'green bridge' to Eynsham, woodland planting throughout the site, provision of bird and bat boxes, and the retention of existing hedgerows and field boundaries.
- 14.3. Particular attention should be paid to providing alternative habitats for wildlife which will be disturbed by the development, and mechanisms where possible to mitigate disturbance. For example, if barn owls are provided with an alternative nesting site before rather than during their disturbance, they have a much higher chance of transferring successfully. And for the same reason we support, as proposed in the Green Infrastructure report, the retention and enhancement of arable field margins, with in mind the current high ecological status of plant life around City Farm. We therefore support the proposed 'Biodiversity Mitigation, Monitoring and Management Framework' document.
- 14.4. We also encourage the Council to learn from recent projects elsewhere where wildflower meadows have thrived alongside road verges, through careful management of cutting and sowing of wildflower species. The organisation PlantLife has recently provided a useful set of guidelines 'Managing grassland road verges' which enable both biodiversity gain and improved appearance of roadsides.
- 14.5. The Options Plan is right to highlight the importance of maintenance of the green and blue infrastructure, and so the specifics of how to achieve this should be covered in the site's master plan.
15. Core Objective GV15
  - 15.1. Support the objective.
16. Core Objective GV16
  - 16.1. We encourage the Council to consider the findings of a project with the Environmental Agency for Natural Flood Management in Milton-under-Wychwood to investigate opportunities for alleviating flood risk while at the same time enhancing biodiversity. This could work in conjunction with Sustainable Drainage Systems deployed within and around the areas of new housing. In addition, considering there is a known problem of high nitrate levels in the City Farm brook, considerate design of this natural space could include plants which can extract nitrates and phosphates from water such as bulrush (exact species to be advised by ecologists).
17. Core Objective GV17
  - 17.1. Support the objective.

18. Core Objective GV18

18.1. Support the objective.

Additional Proposed Objectives

(d) The master plan is to include a comprehensive Construction Management Plan to avoid the type of recent experiences in Eynsham and elsewhere where construction traffic has caused significant and prolonged disturbance, and even permanent damage to existing housing.

**Section 8. Meeting current and future housing needs**

19. Core Objective GV19

19.1. The total number of houses is already indicated to be 2200. This policy states that any increase in this number should be robustly defended. The Council consider that 2200 should be considered an absolute maximum in the life of this plan.

20. Core Objective GV20

20.1. Affordable housing should be 40%-50% being a more reasonable expectation. Although affordable housing is in demand, many buyers will want to buy without the restrictions of being in the 'affordable sector,' especially if higher affordable ratios push marketable prices up.

20.2. The ratio of 1 bed properties in the rented affordable sector is considered too high. This should be reduced to 20%-30% and the 4 bed property ratio increased.

20.3. The AAP states that the mix is a guide only and market evidence may alter the ratios at the time. The ratios should be a commitment rather than a guide unless robust justification leads to change.

20.4. The Council consider with 8.75 that the site is unacceptable for specialist housing provision for students or post graduates.

21. Core Objective GV21

21.1. Support the objective.

22. Core Objective GV22

22.1. Support the objective.

Additional Proposed Objectives

(e) Specialist Housing Needs should be an objective. All housing should meet Building Regulations Requirement M4 (2) accessible and adaptable dwellings.

- (f) A proportion of housing should be linked to education and employment that would benefit from accessible facilities and public transport (key worker).
- (g) The GV is to comply with Building for Life (BfL 12<sup>4</sup>) or equivalent principles unless it can be demonstrated that these cannot be achieved or are being met in an alternative way.

## **Section 9. Enterprise, innovation and productivity**

### 23. Core Objective GV23

- 23.1. Support the objective with the proviso (as elsewhere with the AAP) that development at the GV site should not be of detriment to the existing Parish residents.
- 23.2. It is understood that (i) the region of 40 hectares and not less should be reserved for business and commercial use, lest the zone be too small to attract a critical mass of businesses; and (ii) it should have a “strong relationship with the A40”. It would be interesting to know, should the full development of the business aspects fail to materialise in 2031 and beyond to the extent that is wished for in the AAP, whether this safeguarding of the land for business purposes is proposed virtually in perpetuity; secondly, should a fair proportion of the land remain vacant, would the principles be compromised to allow any type of business to set up (rather than focusing on high-tech and knowledge economy enterprises); and finally, how the A40 and the current challenges in improving it can be accommodated in the strategy.
- 23.3. In particular, the call for the “science park” is aspirational rather than providing any detailed proposals as to how this can be delivered. Apparently, the intention is that this aspect of policy will be fleshed out at a later date in the masterplan and related documents; but the current plan is so vague that few detailed comments on this aspect of the AAP can be made. A notable fact is that the whole question of the A40 is alluded to in this section but not given proper consideration, even in connection with the following Section 10 of the AAP. That later section focuses primarily on private and commuter mobility; the only real consideration of how businesses will operate is a requirement that a DSP (Delivery and Servicing Plan) be in place for commercial operations (10.85). It is likely that a number of workers at the science park / business zone will be commuting to it from outside the GV or Eynsham Parish.
- 23.4. The general aim of providing maximal local employment (to reduce or remove the need for commuting) is sound but depends entirely on the nature of the jobs and median salaries. For example, the current Taylor Wimpey development in West Eynsham has median home prices which make it challenging for the majority of residents working in Eynsham-based businesses to buy such a property, and it is likely many of the units will be bought by people working in Oxford or further afield. The mix of businesses which can be attracted to the GV will have a considerable impact on the extent to which workers can themselves afford to buy homes in the GV.

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<sup>4</sup> [https://www.designcouncil.org.uk/sites/default/files/asset/document/Building%20for%20Life%2012\\_0.pdf](https://www.designcouncil.org.uk/sites/default/files/asset/document/Building%20for%20Life%2012_0.pdf)

24. Core Objective GV24

24.1. This objective is commendable and we support it, but since the AAP requires the science park to be closely connected to the A40 in order to make use of the strategic location, the issue has to be why would a business, especially one based on goods or manufacturing, choose to base themselves here given the A40 transport problems?

24.2. Sections 9.6-9.15 focus on the site as providing c. 40 hectares of business space and note that this is intended as a campus-style setting akin to existing science parks in the region and adjacent to the A40. The primary contention is that the location in the so-called "knowledge spine" extending from Oxford is the starting point for attracting businesses to the location. No specific suggestions or strategy are offered for how this will be done, other than noting that a "Clear USP" and other factors such as links to academia are required (9.11). Note that the 40 Ha. in the GV represents over 54% of the 74 Ha. proposed for the entirety of West Oxfordshire in the Local Plan, i.e. more than all the other proposed locations put together (cf. Lichfields report, p. 32).

24.3. Notably, 9.15 admits that "West Oxfordshire's industrial market is comparatively strong but suffers to an extent from congestion and strategic accessibility." Given the proposed location next to the A40, which suffers from chronic congestion at peak times, we come again to the fundamental problem of transport links needing improvement if the Garden Village is to succeed. Any kind of manufacturing, storage or distribution business would need to think carefully about the road transport issue if considering basing themselves at this site.

24.4. Sections 9.16-9.22 are a long-winded way of restating that national, county and district plans seek to develop innovation and expansion in the local knowledge-based economy. The following sections, further referencing the Lichfields report, note that a "hybrid" approach is perhaps the most practicable, a tacit acknowledgement that it will be difficult to attract R&D spin-off companies from Oxford University given that Oxford Science park has a good deal of existing capacity and other locations are planned to come on-stream soon (such as the imminent North Oxford site only 3 miles away).

25. Core Objective GV25

25.1. Support this objective but as very little detail is provided on how this is to be achieved cannot comment further. More information is required in order to assess how deliverable this objective is, given our above comments on the housing mix, pricing of units and how this may interact with salaries of employers who choose the GV as a base.

26. Core Objective GV26

26.1. Also support, but again little detail on how this is to be achieved.



27. Core Objective GV27

27.1. We support this objective, but note that simply having nice broadband and co-working spaces will in itself, not guarantee increased home-working. The aims are sound but of course will depend entirely on the jobs mix of residents and the extent to which they work in industries where home or remote working is practicable. Around 13.7% of the UK workforce can currently work from home at least part of the time, and this number is likely to grow; the overall AAP strategy seems to be relying very heavily on this likelihood as a way of minimising the traffic impacts of the GV but it is unclear whether there is any possible way to guarantee or even incentivise this outcome.

28. Core Objective GV28

28.1. We support this objective. We note that the objective outputs will be monitored by OxLEP/WODC; however there is no mention of whether (i) fulfilment of planning conditions would be dependent in the CEP (Community Employment Plan) (ii) what enforcement/sanctions could be undertaken if a business fails to generate CEP outputs. Given the lack of existing WODC enforcement of planning condition violations, one wonders whether future businesses or employers can be held to doing anything more than paying lip-service to a CEP.

**Section 10. Transport movement and connectivity**

29. Core Objective GV29

29.1. Strongly support. Reducing the need to travel is not the same however, as reducing traffic in the area. Considerable van traffic is generated by online shopping deliveries during peak work times rather than out of hours delivery to stores. Different policies in the Witney area such as free parking may act as a pull factor encouraging car journeys to supermarkets.

29.2. Another way of reducing the need to travel (for work journeys) is to promote the shorter working week which is finding increasing favour in some sectors (less stress with greater productivity) according to a recent Henley Business School report<sup>5</sup>. The local voluntary sector, which is in urgent need of additional support could benefit from a shorter working week.

29.3. Given this development caters for Oxford's unmet housing needs, by default, housing should have been located on Oxford City's brown field sites near employment thus reducing the need to travel county wide.

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<sup>5</sup> <https://www.independent.co.uk/life-style/four-day-working-week-productivity-mental-health-environment-study-henley-business-school-a8986236.html>.

30. Core Objective GV30

- 30.1. Strongly support. Specific attention needs to be given to active, healthy travel for children given that lack of exercise during childhood casts a long shadow on adult health. Many chronic diseases in adulthood have their origins in childhood. Children currently living in West Oxfordshire do not get their recommended amount of daily exercise. The dependency on leisure centres, often involving car journeys, isn't working<sup>6</sup>. Vehicle speeds greater than 20mph deter walking and cycling at all ages.
- 30.2. Eynsham could share Car Club/ Car Pool schemes as well as promote lift sharing schemes. EPC would welcome the opportunity to host information session on Car Clubs / Lift Sharing for business and the general public jointly with WODC.
- 30.3. Liftsharing works best where sites (employment and retail) don't priorities journey by car over and above journeys made by active travel methods (walking, cycle, public transport). Liftsharing saves both the driver and the passenger time and money. Liftsharing is a real option where public transport is provision is poor.
- 30.4. The business park should not promote work-place parking.

31. Core Objective GV31

- 31.1. Strongly support. The experience of using public transport, especially waiting at bus stops in the area, needs to be given specific attention in addition to the improved frequency of services.
- 31.2. There is a case for including public transport under the 'active travel' banner given that walking, cycling and using public transport results in lower BMI compared to car users<sup>7</sup>.

32. Core Objective GV32

- 32.1. Strongly Support. Creating desirable connections to/from Eynsham (crossing the busy A40), for educational, sporting, social and shopping activities is essential to making PPA26, PPA27, PPA 28 and many others e.g. PA 9 successful. Worryingly, the document gives little details on how adequate connections between the two communities will be made.
- 32.2. The Parish Council support a minimum of one if not two garden bridges linking the site to Eynsham across the A40 that would provide safe and convenient connections to/from the communities. This is an incredibly important aspect of the GV design that must be achieved.
- 32.3. How best to connect the GV to Eynsham should be subject of an international competition.

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<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/832868/uk-chief-medical-officers-physical-activity-guidelines.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832868/uk-chief-medical-officers-physical-activity-guidelines.pdf) Page 9

<sup>7</sup> Ref. BMJ 2014;349:g4887 link: <https://www.bmj.com/content/349/bmj.g4887>

33. Core Objective GV33

33.1. Neighbouring Eynsham's infrastructure cannot support any additional single use car journeys generated by the proximity of the OCGV. Such journeys have a detrimental effect on active travel options in Eynsham.

33.2. Eynsham Parish has raised its concerns about the OCC strategy for improvements to the A40 and the local transport network. The matter is currently with OCC and the Secretary of State for Transport.

33.3. It would also be detrimental for the promotion of all the other policies relating to movement and connectivity should the planned Park and Ride become in effect additional parking for the Science Park.

33.4. While electric vehicles are better for air quality, single use journeys in any vehicles should not be encouraged over that of active travel or use of public transport.

34. Core Objective GV34

34.1. Support the objective.

**Section 11. Climate change and resilience**

35. Core Objective GV35 – GV36

35.1. Apart from some elements of GV38, the objectives read more like aspirations rather than a commitment. They are in no way SMART and need to be strengthened. It would be extremely difficult to assess if these objectives have been met. The points made in the introduction of this section of the AAP are not reflected in the 'objectives.'

35.2. Point 11.6 seems to delegate the responsibility for climate change policy decisions about planning to NPPF rather than taking a lead.

35.3. The Parish Council's Climate Change Policy<sup>8</sup> (adopted in March 2019) Commits to helping make our community carbon-neutral by 2030 it seeks to ensure the highest sustainability standards for all major new development and infrastructure (including transport) and work to with WODC and developers to ensure enforcement actions.

36. Core Objective GV37

36.1. A strong commitment to delivering low and zero carbon energy homes is required in this objective. The GV provides an excellent opportunity for green homes to be provided as standard and to lead by example.

37. Core Objective GV38

37.1. Support the objective.

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<sup>8</sup> [https://eynsham-pc.gov.uk/variable/organisation/37/attachments/EPC\\_ClimateChangePolicy\\_12Feb2019.pdf](https://eynsham-pc.gov.uk/variable/organisation/37/attachments/EPC_ClimateChangePolicy_12Feb2019.pdf)

Yours sincerely

A handwritten signature in black ink that reads "K. Doughty". The signature is written in a cursive style with a large, looping 'D'.

Mrs Katherine Doughty  
Clerk to the Council

**Queries in supporting documents.**

1. Query. Have any of the documents listed the expected journeys from the Northern Development to Witney / Oxford or Eynsham?
2. Cotswolds Garden Village AAP & West Eynsham SPD: Developing the Transport Evidence Base Wood Report. Page 24.<sup>9</sup> There is some doubt about the status of Chilbridge Road. For the avoidance of doubt, it should be noted that this road is a public bridleway.
3. The Eynsham Area IDP mentions the Neighbourhood Plan prioritising a subway under A40. But residents contributing to OCGV have prioritised one or more 'green bridges.' How will this work?
4. The supporting technical studies don't just focus on the OCGV. The consultation however doesn't invite comment broader than the OCGV. EPC needs to look at the implication of all the supporting documents for Eynsham.

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<sup>9</sup> [https://www.westoxon.gov.uk/media/2012410/Transport-Evidence-Baseline-Report\\_15052019\\_with-Figures.pdf](https://www.westoxon.gov.uk/media/2012410/Transport-Evidence-Baseline-Report_15052019_with-Figures.pdf)