

Eynsham Parish Council - Draft response to AAP Issues Paper Consultation:

Executive Summary.

A number of themes have emerged during preparation of this response; they are listed together as they summarise much of the general thrust of the detailed response which follows.

- The Expression of Interest (EoI) to DCLG (Central Government) in July 2016 made a number of **commitments** for a Garden Village development. These must be **honoured in practice**
- The money awarded by DCLG should be used to **fund research** into a number of matters raised by this consultation which are beyond a simple 'top of the head' answer. This is an ideal use for such funds as it should significantly improve the outcome.
- Turning the EoI **commitments into practical reality** will require the formulation and achieving of more targets than a typical development where perhaps less is expected. **Targets should be based on the evidence** collected as part of the research suggested so they achieve the desired ends while still retaining enough flexibility to cope with the inevitable changes over a twelve-year implementation period.
- The use of **recognised standards** such as BfL12 and Building with Nature will simplify matters for both developer and LPA when it comes to individual planning applications.
- There needs to be a masterplan and that needs a measure of **independent validation** (e.g. Design Review by independent experts) to ensure that all national standards and garden Village principles have been taken into account. Hopefully the DCLG funds will cover the masterplan costs. However, there will always be changes when the detailed application is assessed. The developer should be prepared to finance independent validation of any significant deviation from the masterplan, much as they have to present reports for any other planning application.
- **Collaboration** between developers and local people should be a fundamental part of the Garden Village process. A number of '**working groups**' will be needed to make sure particular aspects of the AAP are prepared and, in due time delivered, to meet local needs. Involving **local people** will ensure a degree of democratic control essential in responding to local needs and not the needs of developers and keeping the professionals – whose expertise is vital - accountable to ordinary people.

Suggestion for a realigned A40 – Indicative Map.

The map on the next page was prepared at the end of 2016 to illustrate how the A40 could be realigned with the benefits outlined in the text. *At the time the new settlement was, quite sensibly, given the name Tilgarsley before DCLG, in their wisdom, decided to call it Oxfordshire Cotswold Garden Village when they added it to the list of 13 other winners in their Garden Village competition.*

Draft EPC response to AAP Issues

Footpaths may be paved to provide local walking and cycling routes through the village, integrating them into the green infrastructure which links village and countryside.

No screening belt shown - tree and hedge planting could go on Freeland / Hanborough side of Parish boundary

Cuckoo Lane crosses new A40 via a bridge over cutting to minimise delays to through traffic

Science Park accessed to/from westbound A40 via Cuckoo Lane past P&R. Roads shown dashed are ENP suggestions to minimise A40 delays, NOT OCC proposals.

Utilise A40 'low point' to take new road through a cutting to provide a 'fly-over' access to Park and Ride, minimising delays to thru traffic on A40 and providing safe crossing for cycle-path. Also minimises noise pollution for Tilgarsley if A40 speeds increase. P&R still capable of 2000 cars.

Suggested form of Tilgarsley

compatible with aims of the Eynsham Neighbourhood Plan but with a new route for the A40. Even if this route cannot be afforded immediately (though why not, with so much new building dependent on it, is a mystery) the land should be kept available for a future road improvement.

MAP 2B

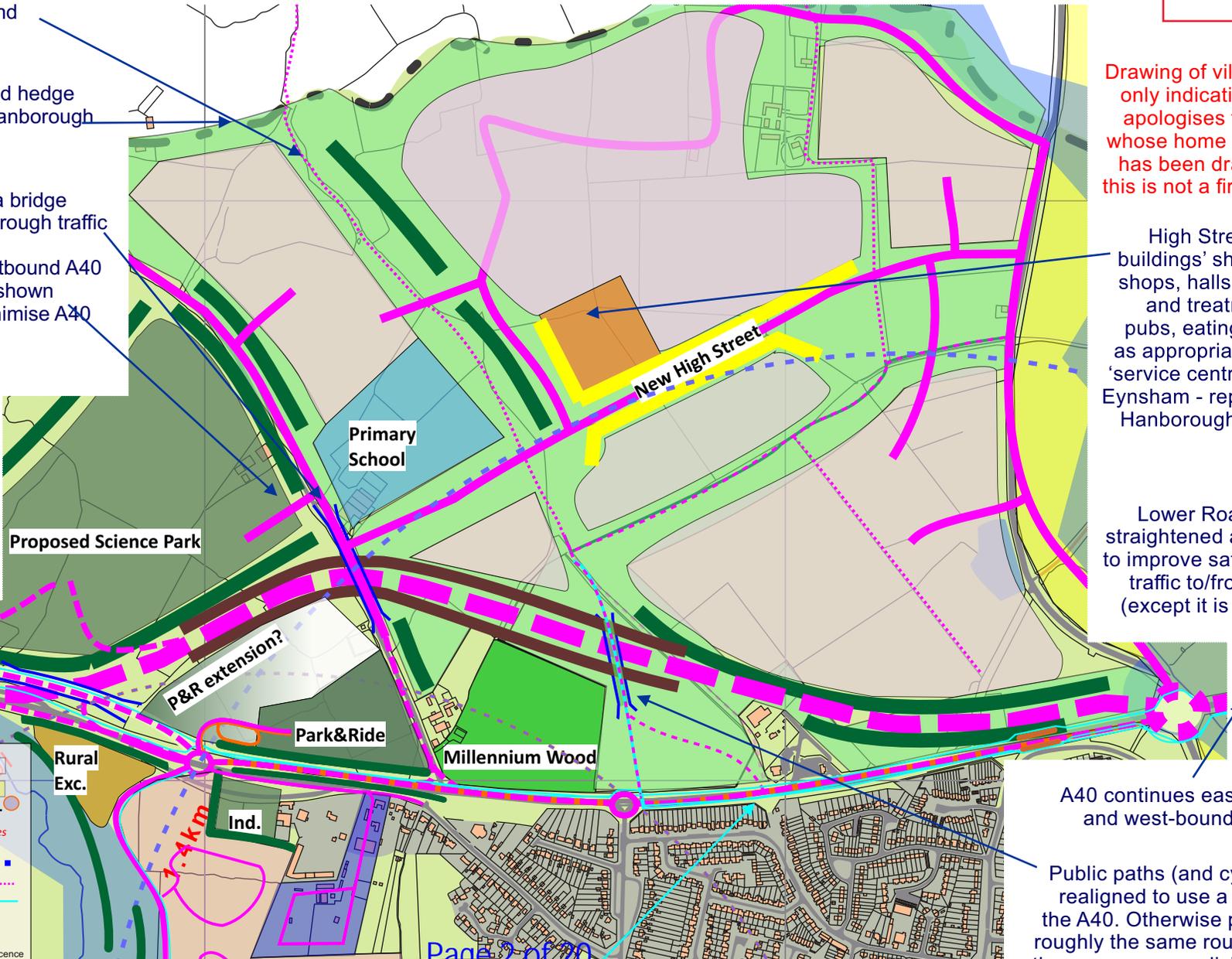
Drawing of village form is only indicative. EFSG apologises to anyone whose home or business has been drawn over - this is not a firm proposal!

High Street and 'civic buildings' should include shops, halls, health care and treatment centre, pubs, eating places, etc as appropriate for a local 'service centre', similar to Eynsham - replacing Long Hanborough in that role.

Lower Road should be straightened and widened to improve safety for extra traffic to/from Tilgarsley (except it is Green Belt).

A40 continues east with east and west-bound bus lanes

Public paths (and cycle routes) realigned to use a bridge over the A40. Otherwise paths follow roughly the same routes through the green-spaces dividing up the village locations.



KEY to overlays:

Green Space	Ancient Monument
Flood Zones 2/3	Oxford Green Belt
Key Village facility....	Nominal Centre.....

Overlays are only approximate to indicate village features described in the report text

Distance to centre 1000m	1200m	
New Road	Bridleway	footpath
Bus Lane	Bus Stop	cycle path
Important Hedge	Tree belt	Cutting

© Crown Copyright and dat abase rights 2012 Ordnance Survey licence number 100049287. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Old A40 only has local traffic and buses; foot and cycle access via pedestrian crossings.

CONSULTATION QUESTION 1: Garden Village Principles

1a) Do you support/agree with the TCPA definition and key principles listed above?

Yes, the 7 last key principles are in general accord with the Vision Section of the Eynsham Neighbourhood Plan (ENP) although not identical as GV principles were not relevant when the ENP was first set out.

The first two principles seem to be overarching ones which we did not feel able to articulate in the ENP but are very pleased to see included in the AAP.

Eynsham parish Council (EPC) consider that the application of these principles will be a huge factor in differentiating a Garden Village (GV) community from a large, impersonal, car-dependent housing estate.

1b) How relevant do you think these are to the Oxfordshire Cotswolds Garden Village?

Entirely relevant. The principle of capturing land value uplift for the community is particularly important given the unusual situation where a new community is being created from nothing. The original idea behind Garden Villages was that they would be built on land bought at agricultural rates so that affordable homes and a vibrant community could be constructed and this needs to be reflected in the AAP.

We note that the principles have a footnote to the effect that 'affordable homes' is not defined. We suggest that some attempt at defining the types of homes to be built should be included in the AAP. The ENP is a bit vague in stating the need for a wide range of types and tenures partly because we are unsure how prescriptive we can be and partly because we did not have resources to establish unchallengeable evidence. The AAP should be able to consider all the options including social housing, housing for junior technical and medical staff and research students necessary for the success of the knowledge economy so vital to Oxford and the locality.

1c) Should any of these key principles be given particular priority in taking the Oxfordshire Cotswolds Garden Village forward?

Not to the extent that any other principle loses out. There are obvious issues that affect this particular location more than others, the A40 traffic being an obvious case, but the principles should cover all the points necessary to create an effective community from scratch.

1d) Are there any other key principles not mentioned that should inform the development of the Oxfordshire Cotswolds Garden Village?

Yes, a principle defining the need for both separation from Eynsham and the potential benefits of sharing specific services which neither community could support alone.

The principles rightly cover the unusual situation of creating a new and independent community. This GV is exceptional in that it is being built in close proximity to an existing settlement. Some may argue that this is at odds with the GV concept which sees a GV as NOT being an extension of an existing settlement.

EPC is concerned that this principle will be watered down with GV residents expected to use Eynsham's facilities at a time when they are being put under considerable stress with up to 1000 new homes being built at the same time on the western SDA.

The ENP raises this tension between separation for day-to-day activities while accepting that there may be benefits of sharing in secondary education and more extensive health care facilities and that this will only be successful if the connections between the two settlements encourage walking and cycling while discouraging car journeys which the lack of parking in Eynsham precludes.

CONSULTATION QUESTION 2: Background context

2a) Do you have any comments you wish to make on the background context for the garden proposal including how and why the site was identified?

EPC has challenged the process by which this site was identified at the Local Plan Examination and has not changed its position since. Nevertheless, this paper concerns the AAP for a Garden Village (GV) and EPC is more concerned that, should it go ahead, the GV bring maximum benefit and minimum loss to all local residents and doesn't wish to go over these matters again at this time.

2b) Have we captured the key messages from the draft Eynsham Neighbourhood Plan regarding the garden village?

Yes, to a large degree. EPC's main concern is that the matters raised are turned into enforceable conditions in the AAP so that aspirations and good intentions are made into reality.

A lot of thought went into the possibilities for development north of the A40 including an extension to Eynsham within a re-aligned A40, re-aligning the A40 as part of a GV and the methods of achieving the optimum safe linking (pedestrian and cycle). Highways matters are largely outside the remit of a NP but our ideas are recorded in the Site Assessments document and can now become part of the AAP.

Para 2.27-30 are particularly significant in regards to the A40 as substantial funds are targeted at transport infrastructure which is already under active consideration for the Park and Ride. The AAP does provide an opportunity for radical transport solutions which might not have been considered without the GV scheme. These should include the possibility of realigning the A40 to provide fewer junctions on the through route and reducing the existing A40 to a local road and bus lane easily crossed by pedestrians and cyclists without daunting bridges or waits at traffic lights. There is a once-in-a-lifetime opportunity to do something radical.

Section 3.

The issues/implications table merits a detailed row-by-row response; numbers below make reference to the row of Table 1:

1. Eynsham has many facilities and the GV can share them.
While EPC recognises that early residents of the GV may have to use some services in Eynsham, this must be seen as a temporary situation in most cases and must not be presumed upon by developers keen to get revenue-earning homes up before building the necessary community infrastructure.
A key element of the AAP will be in setting and enforcing targets relating to this situation for which the following were suggested in the ENP.
 - a. Build apartments over the shops in the centre so that some revenue comes in early.
 - b. Build using factory-built construction so that a high rate of completions can be achieved (together with the environmental benefits of such construction)
 - c. Build social housing early as there is no need to restrict the rate of sales for this type of housing. The same argument can be made for housing specifically for researchers and junior technical staff for whom there is a near insatiable demand round Oxford.
 - d. While these measures will help bring returns in a reasonable timescale it is hoped that long-term funding from life assurance and insurance companies looking for

steady long-term income will also help ensure the community gets off the ground quickly.

At the same time the AAP must set targets for levels of infrastructure that are required before homes can be occupied. The need for Primary Schooling is one case in point where there is so little capacity available to share with Eynsham that building a Primary School will be a very high priority.

Likewise, consideration must be given to safe crossing of the A40 to allow services to be shared satisfactorily and attention is drawn to NPPF guidance that infrastructure to ensure people can use footpaths and cycleways for regular journeys should be in place as soon as occupation begins so that people get into the habit of using such modes of transport rather than car.

2. The demographic deficit of the Eynsham area may be easier to address in a new community than it could be within an existing settlement.

Older residents of Eynsham may be encouraged to relocate to an adjacent village which retains good links with the Eynsham they are familiar with. They would benefit particularly from new homes close to the centre of the new community, given that the facilities are built at the correct time, and consideration should be given to locating the 'extra care' housing in the centre.

Younger people should benefit from purpose-built flats, apartments, live-work studios and the like which are not practical in the existing village.

3. The existing form of Eynsham is quite close to that envisaged for a GV but there is clearly an opportunity to mitigate the limitations of Eynsham, the most significant of which is the lack of a public park at its centre and also the location of the Primary School well away from the centre of the village. The effectiveness of schools and play areas is at least as significant as shops and eating places in bringing the community together in one place on a regular basis.
4. It is important that services, shops and other facilities in the GV do not adversely affect the ability of Eynsham (and GV) residents to access day-to-day needs without resorting to the car as argued in ENP section 11. Our main concern is that a larger store built away from the historic centre of Eynsham could render convenience stores in Eynsham unviable and would still probably involve a car journey for most people anyway. EPC prefers to see convenience stores serving homes in walking distance so providing day-to-day shopping without the need for a car which the most deprived in the community probably lack anyway and they would be inconvenienced most.
5. This also links in with our argument stated earlier that the local and strategic functions of the A40 are best achieved by separating them particularly to minimise junctions which impede traffic flow but also to make crossing easier. See comment on 2.27.
6. Bus links should include routes to Headington, Cowley, Begbroke Science Park, Oxford Parkway Station and others, possibly by the use of another bus interchange at Peartree P&R accessed by buses using the proposed A40 – A34 roundabout link road. Encouraging some joined-up thinking on bus routes is important and the GV may be part of the impetus to do this simply because A40 capacity is so limited.
7. Green space within and through the GV should be better than current village. Connected green space will help reduce impact on wildlife (green corridors) as well as benefitting people.
8. Flats and apartments should be part of the mix but more likely for short-term rent or owner-occupation by research students or young people starting at their first job. It would be a

retrograde step if flats and apartments were seen as a cheap way of providing very high density 'social housing' for local families.

9. Infrastructure provision will be a key indicator of success or failure in ensuring the creation of a new community. There needs to be strong targets set to make sure the hardware is in place as soon as people arrive to allow a proper community to grow and flourish. In particular, it would be a complete travesty of GV principles if children were bussed to school elsewhere.
10. EPC has always supported the creation of high-skill jobs in the locality as they usually provide the best opportunity for creating support jobs for all skill levels, unlike typical 'low-skill' employment in warehousing or retail which tend to create few jobs in total for the space used while massively increasing traffic movements.
11. The ENP emphasised the need for encouraging walking and cycling which will always be compromised unless the A40 crossings are easy to use. Opportunity to build recreational facilities shared between the communities would be good, especially given the large-scale development proposed for the western SDA.
12. Air quality near the A40 may be an issue too.

Answers to Q3:

These issues are the same ones that were used in preparing the Sustainability Assessment for the ENP which in turn have been used in similar previous WODC assessments. They always seemed to have a restricted view of what are the important issues which did make it quite difficult to use these to 'score' development options.

The list of issues from Q1 and 2 seem to offer a wider range of issues more in line with what local residents have said during ENP consultation events.

The issues listed in the table are important but perhaps not comprehensive enough on their own.

Alternatives are mentioned in the row-by-row comments above.

Section 4: The Garden Village (GV) Site.

Q4 a) The AAP boundary is only logical when defining an Area for Growth which is what the emerging local plan defines this site to be. However, it is not clear that a GV should include either a Science Park Industrial area or a Park and Ride.

Neither of these essentially urban constructions seems appropriate to be part of a 'village'.

There seems to have been attempts to conflate the merits, real or imagined, of these two separate entities with the GV as a way of promoting the benefits of locating a GV in their vicinity. While there will be some advantage of having P&R buses serve the new community, this would still be the case if a P&R were located further west on the A40.

Q4 b) For the reasons given above, the Science Park and P&R should not be included as if they are integral with the new settlement.

It will be beneficial to consider these two separate entities as part of the AAP alongside the further entities of the GV itself. This isn't just semantics – the Science Park and P&R need to be considered on their own merits while still being integrated with the AAP.

The AAP area includes the GV but the GV does not include all the elements of the AAP and this should be reflected in the AAP documents.

This section should relate to the 'AAP site' not the 'Garden Village site'.

Q4 c) There is a fourth element of regional significance which is the A40. Although it is complicated by a division of jurisdiction between WODC and OCC, the opportunity to include consideration of this vital local, district and regional asset in the AAP should not be missed.

This should be reflected by explicitly including the A40 along its southern border in the AAP and noting the close co-operation between WODC and OCC to upgrade this stretch of the A40 as part of a wider upgrade.

There is a lot of scepticism about the A40 which people expect to get worse as the new homes are built here and elsewhere in West Oxfordshire. An acknowledgement of the A40 as part of the AAP area would help somewhat to redress the balance.

Q5 Site Description:

Q5 a) There are a number of points in the description which should be corrected.

4.11 While there are no 'nationally designated' wildlife sites, there is an internationally recognised 'arable plant' site which is actually the southern extension of a larger such area which does include Schedule 41 species (4.13). If the arable land is conventionally (as opposed to organically) managed it is certainly within the higher stewardship scheme and these facts should be checked. The exceptional biodiversity of this land will present an interesting challenge if the level of biodiversity on the entire site is to be 'retained and enhanced' as expected by NPPF 109, NERC Act Section 40.

Q5 b) Surprised that there is no mention of the Tilgarsley Site. Although not scheduled, there is some certainty that this deserted medieval village was located on the AAP site. It would be wise to get an opinion from HE as early as possible as any requirement for extensive investigation of the site will impact significantly on development. This is recognised at 5.15 in the next section.

Q6 Site Constraints:

Q6 a) The site constraints and implications seem to be reasonable. At this stage it would be valuable to assess the project risks of the various implications as they vary from minor inconvenience to existential threat without any obvious distinction. At the very least there should be

a rating given to the seriousness of the implication before the next stage of planning is completed, together with any potential mitigation.

As it stands the table is a good list of issues but the impact on the project remains unclear leaving too many hostages to fortune when the real work begins.

Q6 b) All the issues seem to have been covered but, as outlined above, not in enough depth.

Section 6: Opportunities.

Q7 a) 2200 would be a reasonable number to pluck out of the air for any generic GV site; much less than that number and the settlement might not be viable. Some of the existing research into new settlements indicates 5000 is more appropriate for a truly free-standing settlement. The site is constrained by a number of issues already discussed and that 'developable area' of 73 ha probably requires building houses up to the A40 with serious implications both for noise and visual separation barriers and for the potential need to use some of the land to resolve some of the long-term congestion issues on the A40.

If 2200 homes cannot be realised the infrastructure necessary to create a proper GV will be in jeopardy which has serious implications for a very poor outcome if the end result is the 'large anonymous, car dependent housing estate' that so worries anyone who supports real GV principles.

2200 is probably a reasonable assumption but it would be very unwise to assume that the number is achievable unless the density is significantly above the 30 per hectare mentioned. 6.7 is right to point out that housing types are very important. The ENP has no problem with higher densities of well-designed properties and supports the provision of small houses, apartments and flats for a wide range of people; that's not what typical house-builders want – they will look for high value, low density housing so there is a clear potential for conflict and a risk to GV principles.

It was noticeable when assessing the potential capacity of the GV site as part of the ENP process that the actual area available for development became worryingly low as all the constraints were included, particularly making some allowance for enhancing the A40 and providing a separation barrier for which we supported a belt of woodland.

To avoid disappointment as the project progresses, a map showing the developable area should be included and strong targets should be set for housing density which will probably need to be above 30 per hectare. If this raises complaints from housebuilders, it is best to know this now rather than make unachievable assumptions about total numbers and risk compromising delivery of a true GV.

Question 8: Dwelling Size.

Q8 a) There have been a number of answers to previous questions where the need for stronger targets has been mentioned. In preparing the ENP we were careful not to be too prescriptive in our targets but the situation with the GV AAP lends itself to pushing further towards 'prescriptive' than would be normal in many development situations.

Firstly, central government has made significant GV 'enabling' funds available to WODC for this project and these can be used to ensure that any targets are supported by detailed research evidence which it would be hard for an LPA to find normally. Proper evidence will allow a higher level of direction through targets to achieve the desired outcome rather than rely on chance while still allowing scope for the market to sort out the finer details.

Secondly the standards for a GV are significantly higher in many ways than a normal development. There will always be pressure from those only interested in profit – mostly windfall land-value uplift profits as those who do the real work of building are used to more modest returns. Success of a GV

is predicated on diverting a much larger proportion of land-value uplift to community benefit expenditure and the only way to ensure this is to set strong targets that will ensure the right outcome in terms of infrastructure and community benefit.

Thirdly, this is one opportunity to correct the imbalance within West Oxfordshire noted in 6.10, something that Eynsham already does and should be continued in the GV.

The AAP gives the LPA an opportunity to specify accommodation types ideally suited to a number of sub-groups who are particularly essential to the local knowledge-based economy but who are overlooked in the normal categories used for housing. These would include post-graduate researchers, junior faculty, junior medical staff and those moving from the academic to business worlds who are too well-paid for social housing but not able to justify the salaries necessary for buying in this area.

The need for affordable homes for people with a local connection and properties for those downsizing must also be put into the mix as the list in 6.13 indicates.

Given the likelihood that the 30 per hectare density may prove to be somewhat low to ensure a viable community of 2200, setting evidence-supported targets which lead to a higher density and a better-balanced community would be a positive approach.

WODC should commit some of the funds provided by DCLG for immediate research to determine the real house type needs and set strong targets to meet both these needs and set realistic density targets for the GV.

Q8 b) Yes, but what is really needed is the research to determine what is needed rather than rely on our comments here! It is interesting that the ENP approach of 'build the GV to be like Eynsham without the design compromises caused by a long history' looks a good one.

Question 9: Dwelling types

Q9 a) A measure of flexibility is always useful for plans which have to survive the changing economic and social environment of 15 or more years.

However, it does seem that 'flexibility' is a convenient way to give up trying for a desirable outcome when the real problem is lack of political will or lack of resources to research and decide what the best outcome for the community is.

As argued in Q8 a) there is an opportunity to do better by the community through the AAP and the money 'won' by the GV EOI which should not be missed.

Q9 b) Same as Q8 b)

Question 10: Affordable housing

Q10 a) 50% seems a realistic starting point – it should certainly not be less for a GV than for the District as a whole.

It is clear that there are many forms of 'affordable housing' and the correct mix needs to be determined. It is good to see that further research is recommended (6.23) as we have argued in previous answers.

Q10 b) Selecting the right people to do the research is important – perhaps the GV enabling funds will allow the luxury of two different sources to provide different views in an area where objectivity is often coloured by political leanings. Once the research is done there will be evidence to answer this question properly.

Q10 c) WODC should be seeking the views of different social landlords / housing associations as there is a marked difference between the levels of imagination and innovation between providers. In the GV situation the choice of partners – and they need to be partners in the GV *project* not just doing their own bit - for ‘social’ and ‘intermediate’ housing should be a major decision and not left to the housebuilder as is typically the case.

Question 11: Meeting specific housing needs

Q11 a) WODC is committed to providing sites for self-build. How many should again be the subject of proper research rather than opinion, particularly as it isn’t clear quite what is meant by ‘self-build’. One possibility is really low-cost housing through the work of a Community Land Trust (there is one in Oxford looking for sites where they could build houses way below market price as a communal project but not finding any)

Q11 b) 25% of homes built to the Homes for Life standard would be ideal (and once again research to support the figure with evidence would be appropriate). 5% wheelchair-adaptable is often quoted based on about 5% of the population having a ‘blue badge’ but that may be a bit of an underestimate unless such homes are only to be available to blue badge holders which seems a bit draconian.

Q11 c) Yes, this would be a positive move, particularly if the houses are located close to the community centre (e.g. shops, public buildings, etc.) Numbers again should be the subject of research.

Q11 d) This question seems very strangely formulated – no specific answer.

Q11 e) Student accommodation in terms of Halls of Residence for *undergraduates* would be too far away from Oxford and does not seem appropriate in this location. There has certainly been some support for the University taking the opportunity to provide affordable accommodation for *post-graduate* and *research staff*, either rental or leasehold. One college does have a considerable land-holding on the GV site and might consider this as beneficial to the work of the university which must struggle to find accommodation which academics can afford in the City. The same would apply to those moving on from university to employment. Local businesses need such staff and are held back by the inability to recruit or keep them as they often struggle to find decent accommodation in the area and do not want to commute in given the traffic problems.

Q11 f) The same situation faces essential workers as described in 11e. The use of ‘intermediate’ housing (10c) could help here.

Q11 g) WODC has a legal obligation here. Perhaps there is a place where the ‘travellers’ who have persistently occupied sites around Eynsham for many years could be found a permanent resting place, if only to avoid the desperate scramble to secure sites against them when there is a threat for them to be moved on!

Q12 a) Yes, a requirement of the Garden Village, in fact one of the commitments made in the EoI, was that it should be an “Exemplar community built to the highest possible standards”. These are hardly the ‘highest possible’ but anything less than the government’s “minimum space standards” would be inexcusable in the circumstances.

Question 12: Residential space standards

Q12 b) It would seem wise to stick to accepted standards rather than risk arguing over details.

Q12 c) These are described as ‘minimum’ standards so they should be applied universally; if developers want to provide more, they can do so.

Question 13: Housing delivery

Q13 a) A larger and more diverse range of builders should help the speed of build. Research shows the 55 dwelling per site per year average usually achieved is way below what can be achieved (by a factor of up to 3) when builders actually want to do it.

Q13 b) The use of factory-built homes is not only valuable for speed but also for environmental performance which is an important factor as the EoI committed to “the highest benchmark standard of environmental design and performance”. Local firm Stewart Milne should be able to contribute here as they operate a site in Falkirk and are used to building to the higher Scottish environmental performance standards.

Q13 c) Building quickly is important to enable the infrastructure to be built in good time. Our response to 3.1 listed a number of ways to maximise build rate.

Question 14: New business land and other commercial opportunities

Q14 a) and b) Both – each has its merits and they are not mutually exclusive. There is clearly a case for small ‘incubator’ units which can be gathered round common/shared meeting areas / cafés / coffee shops as well as larger self-contained premises for more established businesses.

Locating businesses sensitively in residential areas will minimise the need to travel for some but providing car-parking or public transport alternatives for those who do commute in is probably best addressed by placing the bulk of businesses towards the P&R end of the village.

There is one form of business that does not seem appropriate – large warehouses or out-of-town retail. Both of these provide limited employment and require large buildings out of place in a rural setting. They also depend on multiple car and truck movements which is problematic even if the A40 is improved, whereas knowledge-based businesses are less dependent on high numbers of vehicle movements with higher value per vehicle journey. It is also important to note that knowledge-based businesses create many less-skilled jobs to support them, probably many more so than low-tech businesses which tend to have low numbers of employees anyway.

Q14 c) There are a number of innovative schemes for encouraging business already in operation and this would be another situation in which a small sum spent on research would quickly identify the most likely candidates for adoption here.

Q14 d) Answer as 14c above – sounds like a good idea but why not find out what works best from other people’s experience?

Question 15: Job creation, skills and training

Q15 a) Yes, it appears there is plenty of local experience in the use of a CEP so it should be easy to set up successfully and anything that can be done to encourage people who might otherwise struggle into employment is a positive move. Encouraging school students would also be positive and the Neighbourhood Plan did support the use of educational premises, such as a sixth-form centre, ‘out of hours’ for further education and training, both for employment and for its own sake.

Q15 b) Working from home, living over the office and specifically built “live-work” premises are all valuable in minimising commuting and encouraging entrepreneurs or even individual contractors setting up for themselves.

Q15 c) Again look at the work of other CEPs and adopt best practice. It would be good for there to be someone to take the lead for this activity to be part of the GV project team.

Question 16: Reducing dependence on the private car

Q16 a) All the obvious opportunities seem to have been listed. It is probably a matter of doing well all the different ideas already suggested. There is probably a case for setting a few key targets or even the obvious good ideas won't get turned into reality.

Question 17: Reducing dependence on the private car

Q17 a) At the risk of becoming boring – why not look at what has been tried elsewhere? In principle though, the answer should be 'yes' as the garden village does need to be distinctly different and fulfil the commitments made as part of the EoI to be an "exemplar of good design" and achieve environmental excellence.

Q17 b) It will be a case of multiple small steps. Making the car take second place to people through the use of 'Home Zones', minimising the space taken by parked cars by placing them under buildings, local car and cycle hire, all have their place. There will need to be targets set to avoid a 'business as usual' approach in which the car tends to dominate in a way which it does not in urban situations.

Q17 c) Car clubs will be part of the solution. An important part of the overall GV project will be to establish someone or an organisation to actually make these things happen.

Question 18: Active travel

Q18 a) Yes, obviously, given the emphasis on this in the Neighbourhood Plan. Eynsham achieved a reasonably good, though not perfect, layout over hundreds of years of evolution and the GV can do even better with decent design and a central centre.

Q18 b) The most problematic routes are over the A40. Too many crossings will waste resources on ones that are never used or which slow through traffic so much that they increase congestion. This may be the situation where careful re-routing of existing paths to suit today's needs will be more effective than retaining those that were appropriate in a very different age.

Q18 c) Lower Road is fast and narrow – a cycle route would have to be entirely separate from the carriageway to be widely used but it is a positive idea. Once again this is an opportunity for a study into the best opportunities for building infrastructure to support active travel based on the likelihood of it being well used – and why a bus would not be viable (para 6.96).

Q18 d) It will be necessary to look at the expected pedestrian flows and identify the best routes. There are not many suitable locations as there is a continuous belt of housing along the southern side of the A40 with only two or three gaps.

None of the crossing methods is ideal. A bridge requires a lot of extra distance to gain the required height so people will look to cross on the level if they can. They won't want to wait two minutes (as at The A40 lights) so they will take risks, especially senior school students who will be one of the main users. An underpass requires less ramp length and works under the A40 and Curbridge Road in Witney although many people dislike them particularly if there is no clear line of sight through them.

The best option is to move the A40 round the back of Millennium Wood leaving the A40 as a bus lane and local feeder road which is relatively easy to cross with short-delay pedestrian lights. The main crossing over the 'new' A40, roughly in line with the existing A40 lights and well suited to Bartholomew School students, could take advantage of the higher ground to have a bridge whose ramp does not increase the total distance travelled and is therefore more acceptable.

Question 19: Public Transport

Q19 a) Yes, there is an opportunity for 'mutual benefit' to be had here. Even if the P&R does not materialise on this site, there is an undoubted need for a P&R on the A40 between Witney and the single-track section to Oxford so that single-track can have a bus lane added (in both directions). This will mean more buses running past (and potentially through) Eynsham or OCGV or a public transport hub between them.

While every effort should be made to utilise the P&R, it is wrong to see the P&R as the 'transport hub' to the exclusion of everything else. Policy wants to emphasise 'active travel' which must include a walk, or possibly a cycle-ride, to the bus but we have to be realistic about how long that journey can reasonably be. For commuting, a ten minute – about 800m – walk is reasonable but even at that distance, over half OCGV (and a slightly higher percentage) of Eynsham is too far away without adding some extra stops along the way so, from an OCGV point of view, the P&R location should not be seen as a major benefit.

The P&R is primarily there for people who drive to it and park. Click and collect boxes should be there for people using the parking facility. If people from OCGV live near the P&R and pedestrian access is easy then they will use its facilities too. If the P&R has a convenience store to serve those who park there, that store may also serve as the convenience store for the western side of OCGV but only for houses located close to it (e.g. the 800m / 10-minute maximum distance from a convenience store recommended by the ENP)

Q19 b, c and e) It is to be hoped that the AAP will be closely aligned with plans for the A40, particularly for improved public transport which is the only way to have a lasting impact on congestion of this road and which the bus lanes will enable.

The real need is for a sub-regional approach to integrated transport to increase the number of locations to which passengers can easily be taken either by one bus or by connecting bus services which 'connect' at hubs such as the P&R sites. The UK has been particularly poor at this in the past – indeed the deregulation of bus services in the 80's killed the idea in many places – but the opportunity may be returning and all the local busses are run by one company. For example – if the P&R bus from the A40 were to call at an interchange hub at Pear Tree P&R it would be possible for passengers who want to go to Headington or Cowley to change there. This is more efficient for the bus company than running two separate busses down the A40 to each destination and will allow an effective increase in service frequency so making the option to travel by bus more attractive.

If the GV AAP can get transport planners thinking about such options it could bring significant benefits to the district as well as improving the public travel options for its residents.

There is one other issue relating to the P&R – integrating its design into the GV in a way which keeps it in sympathy with its rural location. Current designs are intensely urban with a strong geometric pattern which seems entirely at odds with a Garden Village location.

As there seems to be a strong desire to include the P&R into the AAP, this matter must be taken into account and the P&R should not be pushed through planning without due consideration to the issue of design appropriate to its location.

Para 6.97 The ENP suggests that **all** new homes should have electric charging points and it appears that DCLG will be consulting on making this standard practice everywhere. Given this level of support, and the fact that electric cars will probably reach cost-parity with petrol during the time the GV is being built, the AAP should include this as a requirement for all GV homes. Electric charging points should be mandated for business areas too (and the P&R) because the most environmentally beneficial charging time is during the day when solar PV generation is available, ideally from the GV house roofs!

Extending the argument further and linking back to the previous question on the P&R, there is an obvious benefit to providing PV solar on all new homes with any surplus being readily utilised to charge cars parked there during peak PV generating hours.

Question 20: Use of technology.

Q20 a) Yes, there is an opportunity to be explored and the proximity of the universities should help in that exploration. This is an area where technology is developing fast and, while this is not the most important element of the AAP, it is an opportunity not to be ignored.

Question 21: Sustainable deliveries and travel planning.

Q21 a) Yes, planning to optimise deliveries both for domestic and particularly business could reduce the number of traffic movements, particularly on the A40. Quite how this can best be done is yet to be determined but there are probably existing solutions of this nature which can be investigated.

Q21 b) Yes, travel plans for the residents – presumably ‘what if’ modelling – and for the construction phase will be helpful as a general planning and design input.

The CLP is probably even more essential as it will have immediate impact on existing road users. Without CLPs the construction phase is likely to be longer and far more disruptive than it needs to be.

Question 22: Highway Improvements.

Q22 a) No, two new roundabouts on the A40 after the Eynsham lights is too many. It will adversely affect the flow of traffic and further lengthen delays for those heading home from Oxford particularly.

Given the sums of money potentially available and the desire to make significant improvement to traffic flow rates, a more radical solution should be sought to improve access to the AAP and the rest of Eynsham, including the proposed western SDA.

We have proposed that the land contours be utilised to split the new dual-carriageway into slip-road access to the P&R and the existing A40 route past Eynsham. Beyond the P&R a new single-carriageway A40 takes the through traffic under Cuckoo Lane, round the north of the Millennium Wood, under a pedestrian bridge which no longer has to be so high as the road is still in a cutting running behind the garage to join up with the existing road at the Eynsham Roundabout. The ‘old’ A40 is now the bus route from the P&R and provides access to all the residential and business areas of the two villages.

Q22 b) The solution for access to OCGV, western SDA and P&R (or whichever goes ahead) should accommodate or provide for all three as one integrated solution.

Q22 c) The existing junctions will need less ‘rationalising’ in this situation as they will have no effect on the flow of through traffic and their impact on the much-reduced local flow will be minimal.

If such a radical solution is not pursued, it will be essential that the multiple junctions from the traffic lights, past the P&R are rationalised or the traffic from Oxford will face further delays. It is hoped that OCC are not deliberately slowing the traffic down although an increasing number of people are seriously considering if that is the Councils intention for some undeclared purpose of their own.

Q22 d) Yes, Lower Road will provide access to OCGV from the east and will need to be upgraded at least as far as the turn-off into OCGV as part of the AAP infrastructure. This may be done at the same

time as improvements to the Eynsham roundabout to improve flow and split / join bus lanes and normal carriageways as part of the A40 'improvements'.

Q22 e) No, we have always contended that the 'spine road' connecting Cuckoo Lane and Lower Road has little value. There *will* always be a through route because these two roads will be the access roads into OCGV but it would make more sense to treat this route, as with that for the proposed western SDA, as a 'through street', built for 20 mph, with a weight limit to restrict through trucks but suitable for buses, to discourage rat-running. The concept of a 'spine road' always seems to waste useful building land as it is unsafe and unwise to have housing directly off a road built for through traffic.

Question 23: Biodiversity.

Q23 a) Yes, given the significance of the natural environment to the commitments in the EoI this will be an essential part of the AAP.

Having set out clear principle based on the NPPF, NERC and other standard guidance which requires bio-diversity gain, the AAP needs to formulate strong targets for achieving these gains in practice.

Q23 b) There will be significant challenges given that the site already has a wide diversity of plant species so it is even more important that targets are set at an early stage so that the design can be completed accordingly. Even the strict application of existing national standards would be beneficial.

The targets must also include validation of the design by recognised and independent experts (such as Wildlife Trust or EN) and for verification that the design has been properly implemented by the same agency.

Q23 c) Yes, particularly as an increase in net biodiversity is a requirement under existing standards. There must be an independent assessment of the existing biodiversity (the Plant-life survey already provides a benchmark) as part of the target setting – see Q23 b)

Q23 d) The Eynsham Neighbourhood Plan has a section on biodiversity which lists a number of issues to be taken into account.

Question 24: Green Infrastructure.

Q24 a) The ENP is quite explicit that a masterplan is required for the whole AAP area and that applies to Green Infrastructure as much as any other matter.

The initial masterplan should indeed set principles and identify standards and the level of detail should be enough to allow the plan to be independently validated as in Q23 b).

If the detailed plans deviate from the masterplan to a significant degree the new design should be subject to the same independent validation as the masterplan itself. In this way the intent of the masterplan will not be lost through attrition

Q24 b) Yes, the use of a recognised benchmark will simplify the task of the designer as they know what they need to achieve and of the LPA in assessing applications for the same reason. The confirmation of a suitable standard will be a key part of the AAP.

Q24 c) From the number of authorities quoted in the text it is clear that Green Infrastructure has a wide impact. Mention has been made of 'independent validation' of plans – perhaps the AAP should seek to establish a representative group of the various parties who may have an interest in the planning and tracking outcomes of OCGV.

Question 25: DESIGN

Para 6.138 is particularly encouraging as it reiterates very strongly WODC commitment to the EoI principles and to delivering on those promises.

Q25 a) Yes, the ENP has always championed the use of BfL12 and was encouraged to see this particular standard suggested for widespread adoption in the planning guidance issued early in 2017. The use of standards does make it easier for all parties to design and validate (Q24 b)

Q25 b) The whole point of BfL12 is that the twelve aspects provide a wide coverage of issues that make for a high-quality development so it is probably wrong to pick out any one of them. It would probably be indicative of something not being right if a lot of emphasis was placed on a few of the aspects and not on all equally.

Q25 c) Clearly, we consider BfL12 a good standard to work to and it seems that DCLG does too. It is very much to be hoped that any Garden Village worthy of that name would achieve the full 12 greens and an Outstanding accreditation. Any lesser aspiration should be challenged both at masterplan and detailed application stages.

SUSTAINABLE CONSTRUCTION.

Presumably the AAP will be restricted as the ENP has been by the ministerial statement which limits the application of additional technical standards. It is good to note that the point made by the ENP about the conflict between the statement and the Climate Change Act is mentioned. The ENP is written on the basis that the Climate Change Act is primary legislation and the ministerial statement can be withdrawn at any time. In that case the AAP ought to be in a position to impose stricter standards although it would be much better if the higher standards were adopted voluntarily for the whole development. The ENP recommends the use of Scottish Gold Standard as it is well-known and already in use within the UK.

The voluntary adoption of a higher level of environmental standards by the development leader could presumably be imposed on individual builders through commercial contract even though it cannot be enforced by the LPA.

One approach suggested by the ENP was to ask developers to explain why they do not feel able to meet the aspirations of the Climate Change Act and the NPPF aspiration to provide a pathway to a carbon-neutral future. Perhaps this should be included in the AAP.

Perhaps a study of the situation will reveal that adopting higher standards from the start will actually result in little or no reduction in profit while increasing certainty over the life of the project, increasing the value of homes which have demonstrably lower running costs and improve overall viability by increasing the build-out rate through the use of factory-built homes.

Question 26: Sustainable Design and Construction.

Q26 a) Yes, the voluntary adoption of higher energy performance should be sought as part of the AAP. Every opportunity needs to be examined to see if the obvious long-term benefit of improved energy efficiency can be offset against minimal increases in build cost. There may even be scope for using the financing package that will be needed for the project which will probably involve one or more long-term return investors to build well now and get the savings back over a longer period with lower running costs.

At the very least the lowest cost but most difficult to retrofit features should be included. Insulation, leak-tightness and ducting for mechanical heat-recovery ventilation can be built into the fabric with little extra cost but are very difficult to add later.

Q26 b) Yes, all opportunities should be examined on a site which is committed to being an 'exemplar' of its type. Financial investment with a view to long-term, sustained returns may be an essential element as in a) above.

Decentralised energy is a bit more complicated and but would make sense if a CHP plant were to be built at the edge of the village; definitely worth a study to see if it is viable as it ought to be on a site of this scale and with suitable financial investment.

Q26 c) Yes, the fitting of solar panels should be the subject of a target for the masterplan, as will be the orientation of roofs for maximum PV generation and passive solar gain.

It is probably worth noting that the P&R constitutes a very large 'battery' into which electricity can be stored during the day and that technology exists for effectively storing surplus electricity as domestic hot water. *(In the latter case the company developing the technology is based in Cassington and I must declare an interest as they are my employers)*

Question 27: Heritage and Culture.

Q27 a) Yes, and there is more evidence for the location of Tilgarsley than 6.170 suggests. There are obvious opportunities to make use of ancient features in the design but one of the best ways to reveal the heritage of the local area would be to include some space for a small museum as part of the public buildings of the new village. It may even be able to display artefacts discovered during the build...

Q27 b) Not to destroy what has yet to be properly researched!

Question 28: Local Food

Q28 a) Yes, allotments are essential for the new community. The ENP recommended approximately one allotment per 20 houses based on the current number in Eynsham (one per 24) always being just over-subscribed. The quality of allotments is very important too – water on site, fencing to keep out the deer and security, either physical or by overlooking of the sites, are important.

Q28 b) Providing security by having allotments near houses would suggest that dispersing the allotments throughout the GV would be better than locating them on the fringes of the development; it will also contribute to an open feel but it will need to be balanced with the need for a walkable village.

The public herb garden, currently in the planters in Eynsham's Square, works well enough as long as there are people willing to do the maintenance. Trees are even lower maintenance but we found huge resistance to planting fruit trees near existing homes (there was a widespread belief that fruit would become ammunition for unruly children to throw around) so best get them planted as part of the initial design and no one will ever worry about it.

Q28 c) The ENP tries to provide for smallholdings to be permitted in the countryside, outside the normal built-up area. This would require attention to the legal agreement to ensure they remain in production in perpetuity or they will quickly resort to expensive country homes with horse-paddocks. Given the appropriate legal framework, smallholdings offer best prospect of local food production. Eynsham already the benefit of the Market Garden shop which is supported by a smallholding in Long Hanborough showing the model can work in an area which is relatively wealthy but most people don't have the time for an allotment themselves.

Question 29: Education, healthcare and community infrastructure.

Q29 a) This is a hard one to call! Everyone seems to like the idea of a small, intimate, primary school and there may be advantages in having an 'alternative' school in the village. However, the primary school is probably the most significant social gathering point in any community, certainly for the parents but also for grandparents and carers. It could therefore be argued that there is substantial community development benefit from having a single, centrally located, primary school.

Q29 b) The ENP suggests that a second site, perhaps for a sixth-form campus, would make sense, particularly if built on the Eynsham side of the village. The ideal site would be next to the Millennium Wood with the A40 routed round the north of it with a footbridge over the new road and easy access over the much less used 'old' A40. *(See Map on p2 although this detail is not shown on the map as we had not thought of using the land east of Millennium Wood for shared facilities when it was drawn.)*

Q29 c) The ENP expresses the public's disgust at the prospect of bussing children to school – even primary aged children – outside the village as this seems to have been contemplated by OCC in response to recent planning applications. It is important that the AAP and SDA sites have adequate primary places available before first occupation.

Q29 d) Eynsham residents are very happy with the location of the current medical centre where most of them can walk to. The prospect of losing that convenience will be strongly resisted unless there are compensating benefits from a new health centre. It may be possible to convince Eynsham residents that an alternative health centre is beneficial for them but only if

- It is easy to get to without using a car – and -
- It offers a better service in terms of getting appointments quicker – and -
- It offers services which can only be accessed now at Oxford hospitals; eliminating the need for trips to Headington for minor scans and treatment would be a significant benefit.

Given the inevitable scepticism that anything new can actually be better, it will be very hard to persuade people of the benefits of a new health centre.

Q29 e) Eynsham has at least four readily available public spaces for hire; OCGV should offer an equivalent provision.

One of the spaces is the Pavilion which is associated with the playing fields in Eynsham. These are well used already and some playing field space should be provided but it would be better to research the overall needs for playing and training, particularly in winter, as it is understood that the MUGA facilities in Eynsham are over-subscribed with local teams having to travel away from the village for training on winter evenings. If space is at a premium, it might be better to provide more MUGA facilities on a site where lights will be acceptable to complement the fields in Eynsham.

The other sports facilities missing from Eynsham are a swimming pool and tennis courts; providing complimentary facilities rather than just duplicating might be a sensible option.

Question 30: Promoting social interaction and healthy lifestyle.

Q30 a) Definitely – creating a community is not an easy task. Adopting 'best practice' design based on experience from other 'new communities' will be important and the AAP will be the essential foundation for this. Encouraging people to meet and interact socially as part of everyday life is an essential element in the design and the main rationale for wanting a walkable village in the ENP.

Q30 b) Yes, and it would be best to find someone willing to live in the new community rather than be there 9 to 5.

Q30 c) Yes, particularly routes for walking, cycling and mobility vehicles which should be suitable for use in the evening and should link up with complimentary routes into Eynsham to make the sharing of facilities practical with the use of a car. There are plenty of guides such as the Manual for Streets which have a long history of good-practice to call on and good layout of homes, streets, open spaces and paths from the outset in the AAP masterplan is essential.

Q30 d) Early delivery of 'health promoting infrastructure' is enshrined in the NPPF to ensure people start out adopting 'good habits'. One of the most important features will be safe crossing of the A40 which is why, at the risk of repeating ourselves, a more radical approach in re-routing the A40 is so important. The most immediate need is a safe crossing for senior school students which will always be necessary in perpetuity. It is also inevitable that there will need to be some sharing of other facilities in the early stages development and it will be essential to offer the option of safe pedestrian access to Eynsham from the very start.

Question 31: Long-term stewardship of the public domain.

Q31 a) The most important thing is to have an organisation that will actually provide a good level of ongoing maintenance; current experience of 'management companies' locally is not good and a measure of local democratic control is best.

Management of facilities such as the Village Hall, Allotments and the Playing Fields in Eynsham works well with local management committees. These facilities can usually support themselves though rental income and grants.

Public spaces are maintained with Housing association, Parish, District and County responsibility with much of the routine work successfully carried out by UBICO; the main difficulty being the complexity of land-ownership with some land having no one obviously responsible for it.

The private sports hall management seems to work well enough but private management of open spaces within developments always seems to be problematic.

Local control, a simple ownership structure and a plan for proper maintenance needs to be established by the AAP. The Parish Council has been caught out by 'gifts' of inappropriately planted spaces which have resulted in considerable expense for the community so the comments of 6.218 are very pertinent. There will need to be funding available for the long-term maintenance at a level which can be supported by the Parish precept with grants used for special projects, not routine maintenance.

Q31 b) No, getting the principles right and established from the start is essential. Leaving 'details' to the end of the process will inevitably result in a poor outcome. It will be possible to sort out details in parallel with the AAP design process but the detail should be worked out by the time the AAP is put formally into place.

Section 7: A Vision for the Garden Village.

The ENP deliberately kept its Vision to a single side of A4 to concentrate on the essential goals which guided the rest of the plan in filling in the details.

Q32 a) Generally yes; the aspirations for high standards are particularly encouraging – and rightly so because that was the commitment made in the EoI.

We suggest one or two amendments:

Bullet 3 should be removed – there is no evidence of need and indications that 2200 will be too many for the site. A compact, walkable, settlement of 2200 is possible but allowing for a sprawl beyond that will give rise to too many design compromises and make the other elements of the

Draft EPC response to AAP Issues

vision for a community impossible to achieve. Garden Villages should be self-contained and the idea of 'future expansion' breaches the GV concept. If this GV is successful then another distinct GV would be much better than spoiling this one!

Bullet 8 could be omitted – using the P&R is an opportunity not a goal, likewise mention of Hanborough Station is not necessary and seems to be a bit problematic given Stagecoach's current position; bullets 7 – 9 can be brought together as one 'sustainable transport' vision.

There are one or two other opportunities to bring points together (e.g. 5 and 10) to make the Vision more compact but generally these are good starting points.

Section 7.4 (Q32b) We respectfully suggest that the Vision and Objectives section of the Eynsham Neighbourhood Plan provides a useful basis. Please use as much of it as you wish.

Section 7.5 (Q32c) ENV8 (added after the EoI was presented) covers our vision for the relationship between the two villages and should be added, with a suitable change to the wording such as

The location is adjacent to Eynsham; neither settlement is to be dependent on the other and all interactions, including sharing of facilities, shall be for mutual benefit and without harm to either.