

Planning Policy
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Dear Sir/Madam,

My Response to the Outline Planning Application (OPA) for the Oxfordshire Garden Village

Due to the extreme complexity and length of the key and supporting documents within this outline planning application (OPA) and the large number of issues raised, many local residents have spent considerable time assisting with responses to the consultation as much as possible in the short timescale. These are residents who want to make local development at Eynsham fit for the 21st century and the best it can be. Therefore, many of the points I will raise may be similar to other submissions you will receive.

Because of this similarity, I also wish to clarify that the composite views and opinions expressed in this letter are shared by me and should be treated as a separate and unique response to this consultation, as well as, given the same weight as any other individual submission. I have also added my own views.

There is good evidence in the OPA that Grosvenor have listened carefully and acted upon the views of Eynsham residents. **However, in its current state, I object to the OPA because I feel many significant principles presented by the members of the Eynsham community have not been fully met.** The planning application must follow the Garden Village (GV) principles (draft AAP, fig.2.3) and the WODC's Area Action Plan (AAP); the OPA should not be determined until the AAP is adopted. So it is concerning that the Planning Statement states at 6.19 that *'the Applicant has sought to achieve these emerging [AAP] policy aspirations where feasible and viable to do so.'* Government guidance on viability is clear that: *It is the responsibility of site promoters to ... ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan'.¹*

I am also very concerned that so many critical issues and many which relate to the excellent garden village principles, will be left 'reserved matters' stage. I am concerned that the OPA is not strong, comprehensive or detailed enough to control reserved matters and build out. This leaves an enormous amount that is still uncertain, ranging from 'movement corridors', how the Garden Village will be managed, to who will design the buildings. Enforceable principles must be part of this OPA.

The points below are organised under topic headings which are taken from the draft AAP.

¹ <https://www.gov.uk/guidance/viability>

1 Climate action

- The Climate Emergency should be a guiding principle of the Garden Village. The OPA intends that the Garden Village will be resilient to Climate Change, (equates with Policy 1 of the draft AAP), but does not mention mitigation (reducing greenhouse gas emissions) or zero carbon development (Policy 2). It is refreshing that climate action is at the top of the draft AAP, whereas climate change is low down the issues addressed by Grosvenor in much of the OPA. For example the Planning Statement only mentions climate change on p 28 and Climate Change does not appear at all in the Development Specification and Framework. By contrast the draft AAP 4.67 says *Climate action is purposefully identified as the first theme and forms a 'golden thread' that runs through the AAP, linking to a broad range of issues including transport, design, green space, biodiversity, water management and so on.* This is very welcome: if development is to go ahead, it should have the least possible impact on this planet.
- I welcome a 'fabric first' approach to high quality construction (Table 3.2 of Site-wide Design Code), but the standards proposed still fall short of net zero carbon and would require costly retrofit. It makes no sense to build homes now that will need upgrading. If we are to meet the challenge of climate changes, Passivhaus or equivalent zero carbon building techniques are needed to reduce heating and cooling demand in accordance with the draft AAP Policy 2– Net-Zero Carbon Development. I am clear that building to high energy standards is as much about affordability, as it is about climate action.
- I welcome the commitment in the OPA of 'no gas infrastructure for household heating', but this should go further. No buildings in the Garden Village should use gas for cooking, heating or hot water.
- The 20% target of onsite renewable sources is extremely low and even this is 'subject to viability'. The Garden Village should provide for 100% of electricity requirements, using onsite zero carbon technologies, in accordance with the draft AAP Policy 2.
- In addition, local residents, some of whom have opposed this development, now hope and expect to see a company with the stature of Grosvenor strive to do better still. This Garden Village, built in an area which has all the advantages of Oxfordshire's thriving high-tech and industrial sectors and world-leading universities, should be an exemplar, blazing the trail in zero-carbon, energy- positive innovation, meeting or exceeding Garden Village principles and taking full advantage of Eynsham's Project Smart and Fair Futures project through Project LEO² and of the innovation and community benefits in smart local energy it will bring.

2 Healthy place shaping

- I welcome the emphasis on active travel and community access to growing and other green spaces and would like these ideas to be developed further at this stage to ensure that they take place (see also sections on active travel and environment). There are areas of concern. The parameter plans set the locations of different types of land use and, for instance, I am concerned about the location of 6th form site about 1 mile distant from Bartholomew, which will encourage vehicle use rather than healthy active travel. It is also on a high point and will

² Project Local Energy Oxfordshire (LEO) is one of the most ambitious, wide-ranging, innovative, and holistic smart grid trials ever conducted in the UK.

demand exceptional design. I am also concerned about safe active access to health facilities for Eynsham residents. The village centre is also on a high spot and will need exemplary design to create a real landmark and a desirable destination with safe attractive pedestrian access for Garden Village and Eynsham residents alike; there is potential but the A40 crossings are outside this application. Higher density housing will reduce the built area and improve access to greenspace.

- Throughout the consultation residents have stressed the preference of many local residents for shared gardens and communal growing spaces, but proposals are not defined in the OPA. Such arrangements encourage neighbourliness and break down barriers. These spaces need to be planned in from the early stages, but left flexible to grow and develop as residents move onto the site. Smaller shared plots, communal orchards etc are more appropriate in this context than traditional allotments indicated which are too large for most people, somewhat inflexible and often too far away.

3 Protecting and enhancing environmental assets

Biodiversity and habitat

- Like the relevant sections of WODC's draft Area Action Plan, Grosvenor's 'Biodiversity, Mitigation, Monitoring and Management Framework' is thorough and ambitious. It needs to be. The built-up part of Salt Cross to the east of Cuckoo Lane coincides with a large area of TVERC's proposed Nature Recovery Network for Oxfordshire. The garden village is also being built over an area of the Wychwood Project, whose purpose is "to understand, conserve and restore the rich mosaic of landscapes and wildlife habitats" of the Royal Forest of Wychwood. Furthermore, Grosvenor's 'Planning Statement' itself notes "the exceptionally high baseline" against which the delivery of a 25% net gain in biodiversity will be measured.
- I know that the destruction of habitat and wildlife wreaked by this development will definitely happen. What is less certain is whether the plans and aspirations for protection and enhancement will be fully enforced once the original players have moved on to other things. To take just one example, 2.6 kilometres of hedgerow will be lost out of 17.6 km (15%). That may not sound a lot, but 71% of the hedgerow to be removed is in the top two categories by natural value. And when Grosvenor's 'Planning Statement' says that "historic hedgerows will also be reinstated along the Salt Way", does that mean that sections will be removed during construction and new hedgerow planted later, or that any gaps in the existing hedgerow will be filled? How do we know that all this habitat and biodiversity enhancement will definitely happen? How can the very small and isolated 'arable planting mitigation areas' compensate for the loss of arable plants from a site identified in the Arable Plant Survey as a whole European importance? Does the scheme support the statement in the Design and Access Statement 5.4 that '*the most sensitive areas have been conserved*'?

Access to the countryside

- Residents who move into Salt Cross, including from the crowded and urbanised South East, will indeed enjoy easy access to green areas and open countryside. Not so the largely forgotten residents of Eynsham village. They will find that their countryside has been pushed further away from them in the north by the garden village, and in the west by the western strategic development (and maybe the east will be blocked off by a new quarry). To access the countryside, they will have to cross more roads both north and west, although the underpass will help (*if it happens*). In the meantime, they will have lost a number of informal footpaths, and the official rights of way will be made unattractive or intermittently impassable by ten years

or more of construction. The ancient rights of way (Salt Way and Saxon Way) are maintained, but will be cut through by 5 'movement corridors' meaning that the retained public rights of way will make the focus and raison d'être of the 'Salt Cross' much harder to enjoy or justify.

- Those Eynsham residents who are active, or want to be, may benefit from the fairly distant 'biodiverse country park', for example, but those who need encouragement to be active may prefer to get into their cars to reach it.
- The community charrette proposed a perimeter park accessible from Eynsham. This green park around Eynsham and the Garden Village is shown on the drawing on p84 of the Design and Access Statement and in the draft AAP Policy 28. Yet the reality shown in Parameter Plan 2 is rather different with a relatively isolated park, rather than the countryside experience that was envisaged. The fragmentation of greenspace is bad for biodiversity and bad for access. The landscape led approach of the OPA and AAP are welcome but many areas need clarification.
- it is worrying that there are significant parts of the site within the control of the applicant (Blue Line Plan) but excluded from the planning application. Will this land be protected from further development?
- Views are an essential part of or enjoyment of landscape character, but are not shown on parameter plans. The GV will have a major impact. Why is there no Landscape and Visual Assessment? (LVIA).

Soil: best and most versatile (BMV) agricultural land

- The Development will 'result in the loss to agriculture of 150ha, of which approximately 43ha are classified as BMV land in Grades 2 (29ha) and Subgrade 3a (14aha).' To lose such valuable land at a time of climate change (drought, floods, other extreme weather events, invasive species, biodiversity collapse), and fragility of food security (due to pandemics, global instability, and Brexit, for example) is short-sighted, reckless and irresponsible. Grosvenor have made a genuine effort to limit the amount of BMV land lost forever, but they should never have been allowed to build over any. This is the fault of WODC. (Grade 3a land is also being lost in West Eynsham.)

Flood risk and water shortages

- Even though Grosvenor helpfully suggest that drainage be designed "to accommodate a 40% increase in peak rainfall intensities to combat future climate change", they still underestimate the potential for future fluvial, ground water and surface water flooding in the north-east of the site. For example, they refer to the flood risk area to the immediate north of the site (Flood Zone 3) as having a "1 in 100 or greater annual probability of river flooding" (from the Hanborough/City Farm brook). In the past four years, this area has flooded each winter/spring, which feels more like an annual probability of 1 in 1.
- The proposals for water efficiency are to be welcomed, but it should not be forgotten that the area in which the garden village will be built is part of a wider area of "demonstrable water stress", a phrase that has rightly recurred throughout the Local Plan process. Over 5,000 new inhabitants, plus businesses and facilities will still add considerably to the 'net gain' in water use. Eynsham residents do wonder if this has been sufficiently thought through. Thames Water have "raised capacity concerns due to the size of the development" and the "impact it will have on their potable water network" ('Utilities Appraisal Report').

Sewerage

- Grosvenor's 'Planning Statement', 'Utilities Appraisal Report', 'Infrastructure Delivery Plan' and 'Environment Statement' are all rather coy about sewerage and foul water, with very little text

devoted to them. Thames Water are proposing a “new gravity sewer” and “a new strategic pumping station”, whose location, however, “is to be confirmed”. The garden village and West Eynsham “might necessitate new or upgraded waste water treatment infrastructure”, but this will be “further discussed and resolved through the master planning processes”. The handling of an issue as important as sewerage should surely not be so vague at this stage.

4 Movement and connectivity

It is of concern that many of the crucial issues of movement, parking and charging infrastructure are subject to reserved matters and many matters need resolution before construction begins.

A40 problem

County transport plans will not resolve the problem

- Housing and employment in the GV will generate more inbound and outbound traffic. Traffic modelling analysis in the Transport Strategy of the OPA by shows, for example, **over 1500 additional morning peak time trips causing increased significant A40 delays and queues between Eynsham roundabout and Cassington** (and on the Hanborough road and at the Toll Bridge).
- This modelling also shows that the proposed Park and Ride and bus lanes may help accommodate the additional volume of GV trips, **but without any benefits for other road users** (made even worse by an additional 7000 dwellings proposed in Witney and Carterton up to 2031 and 1000 at West Eynsham).
- The analysis accepts that there is **no way to improve congestion at the A40 roundabouts north of Oxford**.
- Two new roundabouts (for the GV and Park and Ride) west of Eynsham proposed by the County will make delays worse. The proposed A40 dualling between Witney and Eynsham will not resolve the A40 problem.

Recommendations for a collaborative, integrated approach to transport planning

- The Garden Village, West Eynsham development and A40 improvements should be planned together by all the interested parties.
- The GV and West Eynsham should not be started until the A40 problem has been resolved.
- The risk of cars **rat running** through the GV, Eynsham and West Eynsham to avoid the inevitable A40 congestion must be resolved as part of an integrated approach. OPA parameter plan 3 introduces stretches of access for pedestrians, cyclists and buses only. However the County Council whose consultants (Wood) have said that “in at least the early phases of development” the “spine road” should be “a through road”; and WODC have said their draft Area Action Plan that the GV requires “a spine road to be provided through the Garden Village from the A40 west of the Park & Ride to Lower Road”. There must be no unrestricted rat runs for cars through the GV and this must be established at the start.
- A long-term Travel Plan including active travel is essential and has been included in the OPA Transport Assessment.

Active travel (cycling & walking) and low impact on the planet

- Although not part of the OPA (as it is a County proposal), will the underpass at the Old Witney Road and the three traffic light controlled surface crossings, be sufficient for walking and cycling between the GV and Eynsham?
- The proposed location of the Sixth Form will encourage car rather than active travel.

- The illustrative GV layout shows that residents would have convenient pedestrian and cycling access to their Neighbourhood Centres, Village Centre and bus stops.
- Although the residential car parking standards are intended to reduce over time, the maximum residential car parking should be reduced to follow the draft Action Area Plan (Policy 16) as opposed to those in the Design Code (section 4/7 Table 4.13 residential parking).
- The design must reduce car parking on each plot from the outset, concentrate on shared parking, equipped with charge points and aimed primarily at car clubs and include car free areas as required in the draft AAP (15% car free area as required by draft AAP Policy 16) which I support as a minimum.
- The OPA design principles prioritise path and road design and surfacing for pedestrians and bicycles over vehicles should be robustly locked into the OPA to guide the later reserved matters submitted by builders.
- Similarly, for attractive pedestrian and cycling access from the residential areas to the P&R.

5 Enterprise, innovation and productivity

- I support flexibility of zoning for employment or residential in the employment area west of Cuckoo lane, as many doubt the demand for such a large area of employment. However many also think that we need to rethink workplaces post COVID and make provision for dispersed community workspaces to support homeworkers; this is not specifically provided.
- The essential pedestrian and cycling connections to Eynsham, Hanborough and the B4044 are outside the application but could be included in S106 or other funding but this must be clarified.

6 Meeting current and future housing needs

- WODC is legally bound to consider whether the policies of the Eynsham Neighbourhood Plan (ENP) have been met. The ENP was developed by the local community over a long period with very successful consultations reaching a very broad consensus. It clearly identified the need for a diverse range of housing in terms of tenure, design, both for the market and for affordable and social housing, including starter homes, downsizing for older people and housing adapted for older people and those with special-needs. We expect to see these priorities secured throughout Grosvenor's Outline Planning Application (OPA).
- The Garden Village was initially designed to meet Oxford's unmet need, but we still query the evidence of need, now that growth targets have been reduced. There is no clarity about how allocations will be made to reflect genuine local need nor whether housing designed for Oxford will now be allocated to the WODC waiting list.
- I agree with the OPA priority of houses for key workers and junior staff with local employers, and welcome provision of 5% for self-build, and mention of co-housing and flexible arrangements for those with disabilities or who need live-in care, although there is no clear commitment to delivery many of these types of specialist housing at this stage. It is important that this diversity of provision is promoted from the outset, with clear arrangements for local people's interest to be reflected in the GV. e.g., for less conventional models such as co-housing or group self-build. Without action now, the demand will remain largely hidden and then ignored.
- I welcome the Affordable Housing Statement and OPA outlining a target of 50% of overall housing to fall within the Council's defined tenure types and a balanced, mixed community providing housing for a range of households. However, policy states that this is a guide only and that the precise mix of affordable property sizes will be determined by a number of other factors including evidence of demand at the time of development. Eynsham residents feel

strongly that binding commitments are required at the outset, and not left to Reserved Matters or Section 106 where they can be watered down, particularly, in the light of timescales of maybe two decades envisaged for building. They also mention the desirability of long term, well managed tenancies. In addition, more innovative methods of procurement and tenure are needed to ensure true affordability. Long term, well managed tenancies and 'tenure blind' layouts are highly desirable.

- A key challenge for this site is to retain as far as possible the rural quality of this treasured landscape with its mature trees, winding paths and bridleways, and thick hedges full of wildlife. We welcome the attention to biodiversity in the OPA, with reservations, but all the drawings and designs show trees of equal height and in straight lines which suggests that the plans do not truly recognise the value of a gnarled tree by the roadside or at the end of the close or terrace. I would ask for all mature trees to be regarded as an asset to the housing, and targets set to retain at least 80% of existing mature trees throughout the development (see [ENP13A, p.31](#)).

7 Building a strong, vibrant and sustainable community

This Garden Village should adhere to the principles of Garden Cities which have been in place over a hundred years, constantly brought up to date by experts and stakeholders. These include the following:

- The Garden Village must be owned and managed by the community which lives there.
- The Garden Village must capture the value of the land for the benefit of the community
- Long term stewardship of the Village's assets must be put in place: that means secure arrangements for looking after the Village in the interests of its buildings, infrastructure and inhabitants: the place and its people, present and future

The Grosvenor Outline Planning Application mentions the possibility of allowing 'land to be held in trust' through legal structures to secure long-term resident involvement. The WODC draft Area Action Plan (AAP) goes further and suggests establishing a Community Land Trust (CLT): from community ownership of the whole site, to a 'discrete parcel of land' or 'clusters' of sites, but nothing has been decided and people in Eynsham are concerned these aspirations will be lost. If action is not taken at this stage.

- I welcome the consideration in the AAP to the establishment of a CLT. A far-reaching CLT will ensure democratic ownership. Eynsham residents urge the Council, and Grosvenor to be ambitious in acquiring land, setting up legal structures and forging arrangements which extend to the whole Village community.
- If the Village community is to lead and influence, not just be 'involved', then a CLT should be far-reaching, capturing the value of the land and allowing a Garden Village Trust or other equally robust structure to make decisions by and for the community and the village environment, and giving residents the security of long term, well-managed and equitable systems for development and maintaining the village's character.
- I urge the Local Authority, landowners, developers and Grosvenor as appropriate to make land available at prices which enable the demand for CLTs to be realised. The Local Authority or a developer needs to have a policy commitment to enable and encourage a CLT or multiple CLTs to come into being on part of or on a whole site.
- There is an opportunity to construct a post-Covid, 21st century, full-on, and carbon-neutral Garden Village. This would be a beacon of hope and a model for very difficult mid-Covid times. A great deal of passionate and knowledgeable community involvement has come from the Eynsham area since the GV was first proposed: we want it to result in a model of Garden City development here.

- The CoHoHub report and its sources provide are an excellent resource and set of potential and already-existing partnerships and organisations. Planning consent should depend on its full utilisation.
- The establishing of democratic ownership, with equitable rules and clauses for ownership and tenancy needs to begin at an early stage. This is an urgent issue, as it will involve time, expertise and the building of goodwill of all those involved including individual owners of land and property present and future.
- I believe that a Community Land Trust acting as the manager and landlord would ensure that the development reflects genuine Garden City and Garden Village principles³ and ensure real community engagement. Eynsham people recognise the need to invest time and expertise at an early stage to create the structures and build up the genuine community involvement.

I would appreciate acknowledgement of your receipt of this response. Thank you.

Yours sincerely,

Name

Address

³ See Appendix 3 in the AAP, p.233 ([Draft Area Action Plan \(APP\)](#))