

## **EPIC response to AAP Preferred Options Paper, 6 October 2019**

The AAP is an integrated and forward looking document containing most if not all of the responders' desired aims, objectives, principles and policies. Moreover, much of the commentary and core objectives reflect the views expressed by EPIC, GreenTEA and others in the community. Our comments below relate to specific policies and the need for enforceable standards.

However laudable the general approach, there must be strong enforcement. The generalities must be translated into measurable criteria that can be tested and, thereby, enforced. The District Council must have the will and capability to ensure compliance with the AAP. The landowners and developers will resist many of the provisions affecting their profit – inter alia, the amount and cost of non-market housing and carbon neutral buildings (homes, institutional and commercial buildings).

### **1. Introduction**

**1.3** We support the principle of a statutory AAP, and therefore of enforceable policies and objectives, subject to:

- the policies and objectives being testable, preferably by numerical and/or explicit criteria (the planning applications and, subsequently, the actual development must be capable of robust testing and, if necessary, refutation and rejection); and
- WODC having the resources, capability and will to enforce the statutory objectives, policies and criteria.

### **2. Background context**

**Figure 2.1, Garden City Principles:** Excellent principles that must be applied. We would like this clearly stated; the 'wiggle room' you have given developers in 2.5, by saying the TCPA principles 'should not be taken as a blueprint or rigid set of rules', is too risky.

From evidence so far, the Garden Village (GV) does not appear to capture most, if not all, of the increased land value. The enhanced land value is created by society, yet it appears that this enhanced value accrues to the property owners, who by chance are hugely rewarded by unearned profit from their land ownership. The land owners have created no value and are merely rent-seeking. Without capture of the enhanced land value, the GV could be no more than a well-designed detached settlement. In this respect, it would not be materially different from a large speculative housing development. If built as a New Town, with the enabling legislation, land would be acquired at existing use value +. The enhanced land value would be captured by society to finance development, infrastructure, environmental enhancements and community institutions.

Similar strictures apply to community ownership without the enabling financial support from the profits of the GV.

We are in an existential Climate Emergency. Making the GV carbon neutral must be a priority. This applies not just to the embodied and heating/cooling energy of buildings but to layout, green landscaping, travel, jobs, etc.

**2.6** Again excellent principles that must be applied and enforced. The GV could be a practical exemplar for zero carbon living and working. This must be a prime quality of the GV.

**2.9** Although the Local Plan has been validated, the 2014 population targets on which the Plan is based have been shown to be significantly overestimated, especially the overspill need/demand of Oxford (see 2016 revision).

The Oxford Local Plan has not been considered at local inquiry and the underlying growth assumptions have not been robustly tested. Logically, the West Oxfordshire Local Plan could be based on unsupportable population targets.

**2.18** Key influences on the AAP: ADD a reference to the need to respond to the increasing ecological emergency and climate emergency – declared at national, county and district level – and acknowledge that much national policy is currently inadequate for the challenge.

2.21 The Oxfordshire Housing and Growth Deal is not a statutory document to which the AAP has "to pay regard".

### **3. The Garden Village site**

3.6 Has the air quality of the A40 been measured at morning and afternoon peaks?

3.9 Boundary

Any boundary changes should not damage the valued farmland botany, reduce the GV's internal pedestrian accessibility and, thereby, increase propensity for car travel.

3.27 Agreed.

3.28 This does not seem to square with WODC's criticism of OCC's current plans for A40 as not taking account of the new developments to the north and west of Eynsham.

3.32 Agreed; plus a planning policy for natural carbon sequestration (reducing greenhouse gas emissions will be necessary but will not be sufficient to avert a climate and ecological crisis).

3.36 Agreed. After 'open space' **ADD 'and land for community growing of organic food.**

3.37 And planting for carbon sequestration and/or re-wilding.

3.39–3.40 Agreed.

3.44 and 3.45 The Climate and Ecological Crisis is the most important design criterion for the site.

3.47 "It will be for the AAP to stipulate the key parameters within which we would expect development to come forward; minimising the landscape and visual impact and maximising any opportunities for positive enhancements (e.g. the framing of key views)." The AAP should identify all views and other landscape features.

3.52 "Affordable", as currently defined, only gives a 20% reduction of market rent and price. This is not affordable. The discount should be increased to 40% as previously specified for social housing.

3.54 "The AAP has a key role to play in setting the overall design standards/principles." Please explain how this relates to the Design Code.

3.55–3.56 Agreed. Quality high density is essential for many reasons: to minimise car use, encourage walking and cycling, foster social interaction, minimise land take and enable strategic landscaping and tree planting.

3.57 Agreed.

3.59–3.60 Agreed and essential to prevent West Eynsham becoming a Poor Neighbour.

#### **4. Vision**

The Draft Vision captures the key objectives. More emphasis could be given to environmental and social sustainability such as, for example, carbon neutrality, community-generated green energy, carbon sequestration, low embodied energy, minimal car commuting, and nature reserves.

**ADD to "will tackle the challenges presented by climate change 'head-on'", "by demonstrating zero carbon, energy positive development which benefits the whole Eynsham area and provides a catalyst for change".**

**ADD to "enjoy a broad range of different activities and opportunities" "which complement and enhance the Eynsham area," and leave wanting to return time and time again'.**

4.6 As mentioned above, the laudable objectives must be given explicit teeth to enable enforcement of measurable high standards.

4.9–4.12 Strongly agree.

#### 4.13 Core Objectives

These appear to have lost the overriding aim of environmental sustainability and carbon neutrality, which must be a prime objective. Otherwise, the objectives are practical, practicable and desirable.

**GV1** should define the meaning of Rural Service Centre. Will it be a settlement servicing a rural hinterland in the same way as existing settlements in the central place hierarchy?

**GV3** "To embed high quality and innovative design principles at all stages to create a new garden village that draws inspiration from West Oxfordshire's character and cultural heritage but interprets and reflects this through a strong and distinctive character, form and identity of its own."

**ADD:** by requiring a delivery stage architectural competition and ongoing review by the Design Panel (see also below).

We have a major concern that it will be impossible to ensure innovative high quality design if this is developer-led and market-driven, built by new developers.

**GV7–GV12** Whilst it is good that health is seen more holistically and given more prominence than in the previous AAP consultation paper, this set of core objectives should also include enhancing human flourishing and well-being through retaining the existing beauty of Nature in this site.

**4.26** "From the outset, it is vital that all heritage and biodiversity sensitivities are identified and protected as much as possible." Given our Climate Emergency, **DELETE "as much as possible"**.

**4.27 GV13** Given our Climate Emergency, **DELETE "wherever possible"**.

**4.28** Housing Need should be defined. It is different from Housing Demand, the ability and will of consumers to buy or rent a dwelling at a given market price. Much of the population has housing needs that cannot be part of market demand because of insufficient income and resources to buy housing at the local market prices.

**4.29** The demand for high quality smaller dwellings for "downsizers" is poorly met by new development.

A balanced community of different ages, incomes, interests and abilities is the basis of a vibrant community. Homogeneous single type housing areas should be avoided. Mixing of house types, sizes and tenures is essential.

**4.33** Agreed, but as the developers will control the building and release of dwellings, this may be difficult to achieve: the amount of housing released (supply) will be matched to actual demand by developers so that prices remain high. How can WODC manage the developers' practices to ensure a sufficient quantum of dwellings at the start of the delivery programme? All other things being equal, there is no apparent planning legislation to compel builders to build and release dwellings to meet a delivery programme.

**GV19** ADD carbon neutral to heat and cool dwellings.

**GV20** Affordable housing as defined is only 80% of the market cost. Given the land price demanded by landowners, profit demanded by builders and local house prices and rents, those in housing need will still be priced out. The Garden Village should seek an appreciable number of tenancies at 60% discount for social justice and a balanced community.

**4.39** ADD to the LIS highlights: the garden village could itself be an exemplar in the UK for community energy generation and storage, such as solar paving on cycle tracks as well as solar tiles/PV panels on all roofs in the village.

**4.41** Agreed and important; must be truly sustainable, not merely token Green.

**GV23–26** These core objectives are based on the increasingly flawed thinking around economic growth.

(<https://www.theguardian.com/commentisfree/2019/sep/25/broken-capitalism-liberals-economy-politics>). They should be reviewed when Climate Emergency plans are formulated. If they are capable of responding positively to these plans then these objectives would be appropriate. Given that employees would be likely to be primarily professional and well-paid, how will this use of the GV site narrow the gap between the rich and the poor in West Oxfordshire?

**GV24** The so-called strategic location of the GV on the A40 corridor is entirely dependent on Government support for major mass transport infrastructure for Oxfordshire.

**GV25** Adaptation to changing economic needs is vital at this transition time for our planet.

**GV28** How can the GV deliver this objective?

**4.46** Again a key principle for sustainable development. The ‘overall’ transport strategy will have to extend beyond the garden village, of course, because of, first, current traffic overload; and, second, an exacerbation of this overload due to extensive housing developments west of the GV in West Oxfordshire and beyond.

**4.47** Strange that WODC is lauding the merits of the Eynsham Park and Ride when the Council has publicly stated that plans for the Park and Ride are woefully inadequate and do not take the needs of the GV into account.

**GV29–34** Laudable and must be implemented and enforced.

**GV31** “To provide integrated, high quality and convenient public transport choices centred on the proposed Park and Ride, associated improvements to the A40 and future investment at Hanborough Station.”

**ADD: “and to facilitate maximum potential of the proposed Park and Ride as a renewable energy hub with flexible parking in conjunction with project LEO.”**

**GV35–38** These objectives do not fully reflect the ambitious intentions of 4.52–4.55. The objectives need an explicit commitment to zero carbon in all aspects of the GV development.

**GV37** “To adopt an ambitious approach towards low and zero carbon energy - maximising opportunities to draw energy from decentralised, renewable or low carbon energy supply systems.”

This is inadequate and needs to set standards: our comments are fully set out in section 11 on Climate Change and Resilience below.

**GV38** “To minimise the generation and impact of waste moving towards zero waste wherever possible.” **DELETE “wherever possible”**.

**4.53** “Climate change is happening and it is incumbent upon us to ensure that new developments respond accordingly. Mitigating our impact on climate change and adapting to it, is a core aspect of national policy, reinforced by the UK Industrial Strategy and subsequent Clean Growth Strategy as well as the Government’s recent commitment to achieving ‘net zero’ greenhouse gases by 2050.” **ADD** ‘Moreover, West Oxfordshire District Council has declared a Climate Emergency along with Oxfordshire County Council and Oxford City Council and is thereby committed to achieving net zero locally.

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

### **5.6 Preferred Policy Approach – Key Development Principles**

During the refinement process, these Principles should be translated into measurable and enforceable criteria by the District Council and other stakeholders.

**ADD: “Be consistent with ALL established garden village principles”:** we must not forget Land Value Capture for Community Benefit and development which uses zero carbon and energy-positive technology.

### **5.7– 5.12 Land use**

The AAP needs to set out the exact amount of different uses in the GV.

How will the different land uses across the site be apportioned? Will the process explicitly take into account the core objectives and key development principles within the AAP, especially the most pressing issue of our time globally, that is, our climate emergency? Those measures will take up space too!

### **5.17 Preferred Spatial Framework**

All three spatial models require further technical elaboration, refinement and evaluation against the adopted Objectives before a preferred indicative layout can be selected.

- Higher quality versions of diagrams needed.
- Assumptions of building density to be shown.

Spatial consideration for climate emergency infrastructure required.

However, the following comments may be helpful to those charged with refinement of these spatial options and then arriving at one preferred option.

**5.19** Option 1 – even with the neighbourhood centre being designed otherwise, there is still a danger that the access road from the A40 through to Lower Road will become a rat run through the new village. Are the green ways through the centre the existing wide hedgerows and footpaths?

Option 2 – far less green space than Option 1, none in the centre of the site, as in Options 1 and 3. Social and intergenerational **segregation** likely, due to market forces and house prices. The northern neighbourhood, being less dense, as well as nearer the northern and western expansive green space, is likely to be considered more desirable, and therefore more expensive, than the other two neighbourhoods. In addition, the western neighbourhood will be considered the least desirable of all due to proximity to the Park and Ride. Also, where would the shops, school and community facilities (that facilitate intergenerational and social integration) be located?

Option 3 – Placing the village centre right down on the A40 seems extraordinary (unless the legend is incorrect). During the development of the Eynsham Neighbourhood Plan, many residents said they preferred a green, spatial separation between the garden village and Eynsham, so a refinement based on this spatial option is less likely to be preferred by existing residents.

**5.30** No explicit policy for zero carbon Green development.

### **5.33 Preferred Policy Approach 4 – High Quality Design**

We support the principle of an independent design panel, which must be fully briefed on the key principles, objectives and criteria of the GV.

**AMEND the second paragraph as follows: “The evolution of the scheme design from the early concept stage through to detailed consideration of building and street arrangements and materials to be subject to **consistent** independent scrutiny through an appropriate mechanism such as a design review panel with **community representation**. The panel will also advise on the **Design Code and use of architectural competitions or other measures to achieve excellent and innovative design consistent with the project vision and objectives.**”**

5.35 ADD planting/landscaping for temperature mitigation and carbon sequestration.

5.39 The IDP is an essential element in securing infrastructure from the developers and initially the landowners (most of the infrastructure cost should come from the unearned land value profit of the property owners).

#### 5.46 Preferred Policy Approach 5 – Provision of Supporting Infrastructure

**AMEND as follows:** “To include within the AAP, a policy requiring development at the garden village to be supported by appropriate and timely provision of **sustainable** supporting infrastructure, the details of which to be identified in a site-specific Infrastructure Delivery Plan (IDP) **and Energy Plan** having regard to the overall requirements identified in the Eynsham Area Infrastructure Delivery Plan (IDP).

A particular emphasis to be placed on the timing of provision with a view to promoting social interaction and cohesion, minimising disruption to residents, **protecting services used by existing Eynsham residents** and ensuring that existing services and facilities are not put under unreasonable strain.”

#### 5.62 Preferred Policy Approach 6 – Long-term maintenance and stewardship

**ADD text to** third paragraph as follows: “To include consideration of appropriate governance arrangements, provide for **democratic ownership and governance, land value capture for community benefit, community income from community assets to ensure long term maintenance** and demonstrate flexibility to adapt to changing circumstances throughout the life of the development phase and beyond.”

We are agnostic about the means. Any body must be financially supported in perpetuity either by a large initial capital grant or continuing revenue generation, or a combination of the two. The developers and landowners must not be allowed to walk away from their continuing responsibilities for the GV.

### 6. Healthy place shaping

GV12 – the end of this core objective has been missed. **ADD** to “best of the urban” “**and natural environment**”.

**6.3 ADD** focus on retaining existing natural beauty in addition to new green infrastructure.

**6.13** These alternative ‘ten principles’ are less satisfactory than the HUDU principles, which are more holistic, wider ranging and include responses to the climate emergency that are necessary for health and well-being.

**6.14** Neither does the check list of advice encompass the range of climate emergency strategies that new developments will have to adopt to ensure the possibility of health and well-being of humans and other forms of life in the immediate future.

**6.16** Climate Emergencies have been declared nationally, regionally and locally in the UK since any of the principles presented in sections 6.10–6.15 were created; it would seem sensible for the option in 6.16 to be taken. This would provide a space for all the principles presented here to be analysed and assessed for relevance to the core objectives and identification of gaps. Then a composite and new set of principles could be created for the AAP.

**ADD** to whichever set of principles are used, **the principle of retaining existing Natural beauty to help create conditions for people to flourish.**

**6.26 PLEASE AVOID** labelling older people as ‘the elderly’ as it is disrespectful and de-personalising.

### **Preferred Policy Approach 7 – Adopting Healthy Place Shaping Principles**

It is good to see the aspiration of beauty as a health-giving force (see 6.1) and to see that health is seen more holistically and given more prominence than in the AAP issues consultation paper. However, the set of core objectives underpinning Approach 7 (G7–G12) does not include enhancing human flourishing and well-being through retaining the **existing natural beauty** of this site. Moreover, the importance of Nature and natural landscapes in the development of children and young people to foster curiosity about, and a love of, the natural world has not been captured either. Along with growing up more healthily and having more fun, being in nature helps children to learn through play to understand and respect nature and become more aware of the need to take care of our planet and avoid its further destruction. Developers do not necessarily care about these things or the health and well-being of future generations and are more interested in making huge profits now by

destroying the natural environment. **Therefore, destruction of natural beauty must be prevented.**

Whichever principles are created to support this Preferred Policy approach, they should be translated into measurable and enforceable criteria by the District Council and other stakeholders, especially those in existing, surrounding communities.

### **Preferred Policy Approach 8 - Social Integration and Inclusion**

Agreed. A central part of creating a healthy community. This approach should be translated into measurable and enforceable criteria by the District Council and other stakeholders, especially those in existing, surrounding communities.

### **Preferred Policy Approach 9 – Providing Opportunities for Healthy Active Play and Leisure,**

Agreed. A central part of creating a healthy community. The active design principles in 6.41 should be translated into measurable and enforceable criteria by the District Council and other stakeholders, especially those in existing, surrounding communities.

### **Green Infrastructure**

**6.43 ADD** “Green infrastructure is defined within the NPPF as a network of multi-functional green space in both urban and rural settings and it fulfils a wide variety of environmental, **health**, social and economic functions.

**6.48 AMEND** – Given the above point about the benefits of the natural environment, we suggest you delete “semi” in the following sentence. There is potential to significantly increase the amount and range of accessible open spaces through the development of the garden village with a combination of ~~semi~~-natural woodland and meadows, green corridors, event space, sports pitches and growing spaces.

### **6.50 AMEND –**

Sensitive areas of the site, for example City Farm Brook should be left undeveloped ~~where possible~~ and visually prominent parts of the site should be treated carefully.

Accessible open space should be significantly increased with a combination of ~~semi~~-natural woodland and meadows, green corridors, event space, sports pitches and growing space.

### **Preferred Policy Approach 10 – Green Infrastructure**

This Policy Approach is very good and contains most of the right ideas. Moreover, it sets out the Building with Nature benchmark that will be used to judge the quality of green infrastructure development. However, only the final design and development can provide the test of the good intentions. The AAP will have to demonstrate how biodiversity enhancement and climate mitigation/adaptation is achieved.

### **Preferred Policy Approach 11 – Enabling healthy food choices**

This policy is well-supported by stakeholder evidence, but it lacks any principles, such as restricting the use of herbicides and pesticides in any growing spaces and the public realm, that can be translated into measurable and enforceable criteria by the District Council and other stakeholders, especially those in existing, surrounding communities.

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

### **Preferred Policy Approach 12 – Biodiversity Gain**

Strongly support, and the associated ideas. There is a risk of "gaming" the measurement system and resorting too quickly to offsite compensation as an easy way out of adaptation on site.

The protection of “mature trees and hedgerows” is mentioned elsewhere (eg, paragraph 3.33, but not in section 7. Two additions are therefore essential here:

- Concentrating only on “mature trees and hedgerows” risks consigning anything outside the arbitrary category to destruction and removal. All trees and hedgerows have intrinsic biodiversity and well-being value, and removal of any should be rigorously controlled and resisted.
- The AAP should have a reference – and here is as good as anywhere – to “rewilding”, which is a more natural and resilient way of increasing the extent of existing woodland and thickening hedgerows on the site. Both rewilding and planting will be needed to meet the elusive goal net biodiversity gain.

### **Preferred Policy Approach 13 – Water Environment**

The integrated water management approach when addressing the water environment” and the “ambitious approach to the water environment”, with both of which we agree, should specify the importance of long-term **maintenance**.

**Flood risk:** there should in addition to other precautions be absolutely no building in recorded flood areas. Also, in view of climate change, elevated construction and fittings in flood-marginal areas would be essential.

**Impact on water demand:** not only will evidence be needed on how water efficiency is being maximised, but if an honest and realistic appraisal of the impact indicates that constraint on the extent of development is necessary, then that should be fully taken account of.

Likewise for wastewater capacity (eg, at Cassington treatment works) and water quality.

### **Preferred Policy Approach 14 – Environmental Assets**

**Light pollution:** street lights need to be shaded to avoid disabling dazzle. There should also be shrub and hedge planting, where it does not already exist, in paths and roadways to insulate from noise. No chemical plant control, use permaculture principles.

Buildings should be kept well away not only from the A40, but from the increasingly busy Lower Road and Cuckoo Land. Green-hedge noise and pollution barriers will be required.

The same level of concern that the AAP expresses regarding the Oxford Meadows SAC (in terms of air pollution and HRA), and the protection that it enjoys, should be applied to the rich and diverse habitats present in the GV site.

We agree, most definitely, that any areas of higher grade best and most versatile agricultural land should be avoided (both Grade 2 and Grade 3a). The bar for “demonstrably impractical in line with the draft Eynsham Neighbourhood Plan” should be set very high. Another reason why Grade 3a should be as strictly protected as Grade 2 is that so much of the former is due to be built over (unnecessarily) in the West Eynsham extension. That lost good soil to the south of the A40 certainly needs to be compensated, and the GV is a good place to compensate for it.

## **Preferred Policy Approach 15 – Heritage Assets**

The listed buildings at City Farm and the suspected site of Tilgarsley village must be protected **at all costs**. The historically important routes with their trees and hedgerows must also be protected. The buildings must be situated in the lower parts of the site, excluding recorded river flood land. This will preserve the natural appearance of the land and will hide the bulk of the GV.

We fully agree with the second and third paragraphs in this Policy Approach.

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

The Core objectives in this section reflect the views expressed by EPIC and others in the community, emphasising the importance of housing quality, sustainability and a genuine mix of tenure, size and design.

These principles have not informed much recent housing development in this area, resulting in monochrome featureless estates with little or no attention to contemporary zero carbon design. To protect the statutory principles of the Garden Village we are very clear that these core objectives need to be incorporated into every aspect of the development.

**8.4** We feel strongly that the maximum of 2200 houses should be guaranteed as the absolute limit. We are concerned that the following paragraphs describe this as “overly prescriptive “. This phrase should be deleted as this opens the door to pressure for more houses which cannot be justified on the grounds of need and would damage the clarity and coherence of the Plan.

The paper refers to modern methods of building but it does not specifically refer in this section to high environmental standards. Clearly in view of the Climate Emergency it is now crucial that all housing must meet the highest possible standards in terms of their carbon footprint. New technologies are being developed all the time and this should be reflected in legally binding requirements for the selection of builders across the site. It is no longer acceptable to say that building zero carbon housing affects affordability. As a society and as a local authority it can no longer be seen as a choice.

**8.12** We welcome the emphasis on the mix of housing in terms of tenure, size, design, and the desire to meet a much broader range of housing need than the current preoccupation within West Oxfordshire on family and executive housing. All our consultations in Eynsham on the Neighbourhood Plan and for the Garden Village provide strong evidence that what is needed here is a mix of housing across tenures, age groups, family composition and family size that does not exist in most of the new developments across the county.

The Eynsham Neighbourhood Plan (ENP) was informed by a huge amount of detailed consultation about what housing people wanted, for example:

Evidence presented in SA Scoping Report S2(SA S2) and consultation with residents and businesses indicates that Eynsham is particularly in need of smaller homes, typically 2 bedrooms for the following groups:

- those on a waiting list for affordable housing;
- young families who want open-market starter homes;
- junior skilled staff required by high-tech businesses, health & education institutions; and
- older people looking for somewhere smaller and better adapted to their needs.

Estate agents will inevitably focus on 3 to 4 bed roomed houses because that is primarily what they sell. People looking for different forms of tenure, shared arrangements, etc, do not register with estate agents. Equally, waiting lists do not reflect real demand as people do not register when there is no hope of success.

This section should explicitly recognise the evidence of need in the ENP. The waiting lists for shared ownership, self-build, etc, should be opened now, encouraging people to register what they are looking for so that this can inform the phasing of the building. The plan needs to retain maximum flexibility around housing type as it is only when we start to test the market that we will really understand the appetite for shared ownership, shared common living, maisonettes and flats, different methods of building and renting, etc.

The developers and community organisations should be working together now to explore community land trusts, co-operatives, etc, so that these can be in place before the work starts.

See Sir Oliver Letwin's report published last year:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718878/Build\\_Out\\_Review\\_Draft\\_Analysis.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718878/Build_Out_Review_Draft_Analysis.pdf)

**8.22 Affordability.** The government definition as a percentage of market value does not work in areas of high demand and high prices. It is very clear from all recent new housing in and around Eynsham that applying this formula does not create housing that is within the reach of most of the groups we have identified in the ENP and thus in the plan. The plan should make explicit its own definition of affordability and create a target that will ensure a genuine mix.

In addition to rents and mortgage repayments, the cost of energy is a major factor for families and individuals. High energy building standards also reduce living costs and should be seen as contributing to affordability. We urge the local authority and developers to engage positively with the forward-looking and enterprising initiatives led by Project Leo and the Low Carbon Hub which could bring real long-term benefits to residents and the wider community.

### **Preferred Policy Approach 16**

Notwithstanding the practical measures to deliver the housing target between 2021 and 2031, the programme should be sufficiently robust to achieve the desired social, economic and environmental outcomes if the target cannot be achieved in the plan period. Given the capacity of the national and local building industry, the past building rates, uncertain economic conditions after Brexit and the behaviour of developers in "managing" supply and demand, there is a high probability that the desired build out rate will not be achieved before 2031.

**8.25 Agreed.**

**8.26** The District Council must be resolute in meeting housing need with truly affordable rents because the landowners and developers will strongly resist both the quantum of social housing and low rent.

**8.34–8.36** As the Local Plan and GV are based on the 2014 housing target for the County, and not the lower more objective 2016 target, seeing the GV's future residents as Oxford overspill is misleading. These residents would probably not be displacements from Oxford and would probably not even be residents of the County, but migrants from outside the County. The draft Oxford Local Plan has not been resolved at inquiry and there may be major revisions to the City's housing requirements.

**Preferred Policy Approach 17**

"Subject to viability" will inevitably be deployed by landowners and developers to reduce their financial commitment. The District Council must have access to specialist housing finance expertise to challenge these assertions. There is a risk that other social, environmental and community infrastructure could suffer because of "viability" arguments.

**8.46** WODC should make people aware of the Council's Self-build and Custom Housebuilding Register.

**Preferred Policy Approach 20**

Agreed because the variety of housing provision will enhance creation of balanced communities. Housing that requires commuting should not be encouraged (see the fourth paragraph of this Policy Approach).

**9. Enterprise, innovation and productivity**

**Preferred Policy Approach 21**

A science park would be inhibited by poor "connectivity" on the A40. A congestion free Green link to Oxford is essential. Furthermore, science is already well catered-for in other parts of Oxford and its surrounding areas.

**Preferred Policy Approach 22**

Agreed.

**Preferred Policy Approach 23**

Important for a low climate impact future that minimises commuting.

## **Preferred Policy Approach 24**

Agreed. Excellent proposal.

## **10. Transport movement and connectivity**

As recognised, the Garden Village is a large and complex development and phasing the work to minimise disruption is very important to the local community. We remain extremely concerned about the impact on existing transport infrastructure given the totally inadequate plans for the A40, both for access to the site for the construction itself and to meet the increase in traffic resulting from considerable new housing in this site and to the west.

We need reassurance that access to the site during construction is managed competently and that lessons have been learnt from the fiasco currently affecting the Thornbury Road area of Eynsham. The pace and phasing of the development must seek to minimise disruption to the wider community and to those who rely on the A40.

**10.2** Having said that, and notwithstanding the inadequacies of the proposed A40 'improvements', this transport strategy must be broadly supported.

## **Preferred Policy Approach 25**

Excellent intentions, fully supported. However, as indicated, the GV can never be self-contained. Inevitably there will be significant out and in commuting despite the principle of balancing work and homes (see P Headicar's early study of commuting patterns in Oxfordshire). Reducing demand for car travel must be an integral part of the continuing management of the GV. An integrated approach, as indicated in the AAP, is the best way of reducing car travel.

## **Preferred Policy Approach 26**

This is excellent and captures the best ways of ensuring sustainable healthy travel. However, **ADD: Future proof flexible design that allows car parking spaces to be reallocated to other uses as private car ownership falls.**

## **Preferred Policy Approach 27**

Agreed and strongly supported with particular emphasis on improving connection to Hanborough Station, Eynsham (pedestrian/ cyclist over- or underpass) and Oxford (B4044 Community Path).

### **Preferred Policy Approach 28**

This integrated approach is essential. Strong support for enhanced connection to Hanborough Station, the fastest, least congested, most sustainable mode to Oxford and beyond. Although outside the scope of the AAP, Phase 1 of the Park and Ride must have a dedicated eastbound bus lane to the Wolvercote roundabout. It should not stop at Dukes Cut.

### **Preferred Policy Approach 30**

Subject to future technological change, 25% charging points should be a minimum.

## **11. Climate change and resilience**

### **11.1–11.15 Climate Change and Preferred Policy Approach 31**

This is the greatest threat facing the world and is duly acknowledged.

The AAP should also consider the "embodied" energy of buildings. Up to 50% of carbon in or created by dwellings can be embodied. The amount depends on, among others, life of the building, construction materials and methods, location and travel.

**GV37 (from Section 4)** "To adopt an ambitious approach towards low and zero carbon energy - maximising opportunities to draw energy from decentralised, renewable or low carbon energy supply systems."

This is inadequate and needs to set standards appropriate to the declared climate emergency and advice from the Committee on Climate Change. Thus, **AMEND GV37 so that it reads: "adopt and implement the Energy Plan developed in conjunction with Project LEO to include reduced levels of embodied energy, development which is zero carbon in operation and which is a net exporter of renewable energy, to act as an exemplar and catalyst for change "**.

**11.20** Zero carbon must be the standard for market, social and affordable housing. The Bicester Eco Village demonstrates that this can be commercially viable.

### 11.21 Preferred Policy Approach 32 – Sustainable Construction

“To include within the AAP, a policy setting out the sustainable construction requirements that will be applied to residential and non residential buildings at the garden village. Subject to further consideration regarding viability and practical delivery, the intention is to achieve zero-carbon standards for both residential and non-residential buildings, whilst allowing for carbon offsetting where this is demonstrably shown to be impractical.”

A central principle of the GV that must be pursued vigorously. However,

- **AMEND Preferred Policy Approach 32 to DELETE reference to viability and offsetting.**
- There can be **no justification for offsetting** in a new development fit for the future. It will need to go beyond zero carbon in being energy positive if we are to compensate for all the substandard existing building stock which will be much harder to bring up to standard (see below).
- **ADD: To follow the recommendations in Committee on Climate Change report *Housing fit for the Future?* (February 2019) in anticipation of emerging policy (such as the Future Homes Standard and revised Building Regulations) to support the measures, including under Section 4. When building new homes, this means:**
  - By 2025 at the latest, no new homes should connect to the gas grid.
  - Make all new homes suitable for low-carbon heating.
  - New homes should deliver ultra-high levels of energy efficiency as soon as possible and by 2025 at the latest, consistent with a space heat demand (TFEE) of 15-20 kWh/m<sup>2</sup>/yr. (Passivhaus is 15; current Part L is over 54).
  - Statutory requirements should be in place to reduce overheating risk in new-build homes.
  - Improve focus on reducing the whole-life carbon impact of new homes, including embodied and sequestered carbon. Eg, using timber in place of concrete and steel. New policies will be needed to support this.

- Set up robust independent monitoring and reporting to ensure that performance standards are achieved in operation.
- **There is no specific mention of embodied energy**  
**ADD: To require whole building embodied energy reduction, to be assessed by licensed assessors to achieve at least BREEAM excellent (best practice), preferably BREEAM outstanding (innovator), or other equivalent approved methodology, as new methodologies emerge.** (Reference: Aecom, 'Options for incorporating embodied and sequestered carbon into the building standards framework', prepared for the Committee on Climate Change 2019).

### **Preferred Policy Approach 33 – Decentralised, Renewable and Low Carbon Energy**

An excellent principle, but **ADD** the following emboldened text to this Policy Approach (third paragraph):

**“To also include a requirement to implement the recommendations of the Energy Plan developed alongside Project LEO, which will maximise the potential for an integrated, low carbon energy system within the zero carbon garden village and to maximise linkages with existing or proposed renewable and low carbon energy infrastructure in the locality, to become an exemplar of smart use of local renewable energy and catalyst for the transition to zero carbon communities.”**

**ADD:** To require on site energy generation to exceed demand (energy positive), as recommended in the Energy Plan.

**ADD:** To support and integrate with the proposed energy hub at the Park and Ride with respect to renewable energy generation, sustainable transport and flexible parking.