

Collective in-depth EPIC response to WODC's 'Issues Paper' for the AAP regarding the Oxfordshire Cotswolds Garden Village

This document is a compilation of the thoughts and voices of several Eynsham residents who are affiliated to the Eynsham Planning Improvement Campaign (EPIC). Certain themes recur repeatedly as different contributors reinforce each other's arguments. Some voices add new material and perspectives. All are united in a passionate desire to retain what is special about Eynsham and avoid losing the village's identity and community spirit as a result of development that is badly planned, hastily implemented and overwhelming. We begin by summarising some of our 'red lines'.

EPIC red lines

1. There is strong evidence from multiple sources in previous consultation and hearing responses that the choice of site for the Garden Village (GV) is deeply flawed. (More recently we have heard that the Oxford Civic Society endorses this conclusion.) WODC has consistently ignored much of this evidence, which must now be fully acknowledged and addressed.
2. It is essential that the AAP includes full consideration of West Eynsham on every issue and assesses the impact of development both north and west of the village on Eynsham **as a whole**. It must set out how this impact will be mitigated and channelled for the overall benefit of the parish. West Eynsham must be developed to the same high standards envisaged for the garden village.
3. Rigorous surveys of heritage, environmental and biodiversity assets, agricultural land classification, flood risk, and air and noise pollution on the **whole of the site** need to be included in the AAP. Any 'mitigation' measures must be transparent and open to public scrutiny to ensure they genuinely protect those assets or deal more than adequately with the risks. These surveys should be done first, before the AAP is finalised, to provide a sound evidence base for the plan.
4. Local groups must have a documented and meaningful role in developing the AAP.
5. Should WODC persist with this inadequate and inappropriate site, the development must be state of the art and a world class example of how to respect the environment, cause minimal destruction to surrounding communities and wildlife habitats, and contribute to the climate change targets through meeting the highest building eco-standards for all housing (including the genuinely affordable housing). It must have a 21st Century transport infrastructure that links not only the GV but also surrounding villages to main transport routes in Oxfordshire and beyond.
6. WODC must ensure that the developer does not attempt to scale down the AAP or cut corners to increase their profits.
7. The Issues Paper closely follows the policy content of the Eynsham Neighbourhood Plan (ENP). This should be clearly acknowledged in the AAP, particularly in the light of adoption of the ENP not being granted at present (an anomaly which should be noted). These ENP policies should not be watered down. An acknowledgement of the ENP, and a promise to implement those of its policies repeated in the AAP, might make it more likely that the AAP is acceptable to residents of Eynsham and surrounding villages.
8. Eynsham residents must be clearly and regularly informed how their comments are being taken into account.

In-depth EPIC comments

CONSULTATION QUESTION 1: Garden Village Principles

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

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

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

1a) Yes, but the landowner-driven proposal will prevent proper land value capture. S106 and Community Infrastructure Levy payments for infrastructure have always been inadequate (some research shows only 3% of the cost of providing and renewing transport infrastructure comes from developers/landowners). Garden Towns (as envisaged by E. Howard) were based on the capture of enhanced value for necessary facilities, infrastructure and subsidy – for future residents and workers. To create a place for the Good Life, land value must be captured and deployed to create a community.

1b) Garden Village/Town principles should be relevant to all new development. The unsustainable strategic location of the Garden Village (GV) and its purpose as Oxford overspill prevents the realisation of many of the key principles, such as integrated sustainable and convenient access to jobs, services and family networks. New sustainable settlements should be extensions to the larger towns where non-car sustainable travel, such as walking, cycling and public transport, can be better provided. A freestanding GV should be located on an existing sustainable transport network (for example, railway, light railway, tram or segregated dedicated bus way). Homes should be close to jobs, facilities, services and families.

1c) Yes: deploying all the enhanced land value for the provision of community facilities and infrastructure for the new residents and existing local residents. Any surplus land value must be dedicated to innovative sustainable transport infrastructure along the A40 corridor as a part of an integrated network strategy for Central Oxfordshire.

CONSULTATION QUESTION 3: Eynsham profile

3a) Do you agree that the profile of the Eynsham area outlined above is accurate?

Public transport accessibility is good (premium routes over the Toll Bridge and less frequent service along the A40).

Although the frequency of buses is good, there are problems of peak period congestion at the Toll Bridge with no bus priority, and more service impairment on the A40 because of traffic volume and the Cutteslowe Roundabout. These bus services focus on Central Oxford. Bus access (and car access) to the Headington hospitals and the growing employment areas on the east of the City is inconvenient, unpredictable and time consuming.

CONSULTATION QUESTION 6: Site constraints in relation to Heritage

6a) Do you agree with the site constraints we have highlighted above?

6b) Are there any particular issues we haven't mentioned that you think should be taken into account?

Paras 5.11 to 5.18

5.12 The setting of the Listed City Farm Barns and Farmhouse needs to be a generous area to make sense of their agricultural context. A radius of 400 to 500 metres should remain as open farm land. It should be noted that there is a close precedent for this in Eynsham. The Planning Inspector, Wenda Fabian, in her decision to refuse development of 49 homes on Land off Station Road, Eynsham on 16 May 2016 cited one of the reasons to be that the whole site was part of the agricultural setting of Listed Grade 2 Abbey Farm Barn. The furthestmost boundary of the land is over 400 metres from the Listed barn.

5.14 The site of Tilgarsley Deserted Medieval Village (DMV) has been fairly conclusively identified in LIDAR images and needs archaeological investigation and conservation. Its setting with medieval field systems needs protecting as well- say a 400 metre radius.

5.16 Yes: the plan should definitely demand a detailed archaeological investigation, especially geophysics and trial trenches. A full excavation of the very important Deserted Medieval Village is particularly warranted. The AAP issues paper fails to mention that it is rare. This is because there is documentary evidence that it was totally abandoned in 1349 as a result of the Black Death.

Regarding Question 6b, no mention is made of the ancient trackways. The Salt Way (possibly Roman, certainly medieval according to the Eynsham Abbey Cartularies) running north/south and the boundary track running east/west need protection with bands of green space on either side.

Likewise, there is no mention of the wider historical context of this site, for example:

- Eynsham Abbey and its role in the Salt trade and control of the Salt Way running near the DMV
- The impact of the Black Death on the area
- Earlier land uses of which there is much evidence on the site (Bronze Age)
- Eynsham's farming heritage, in particular the presence of an old traditional farm on site that has never been intensively farmed, and which retains its dense patchwork of small fields and old hedgerows, woods and ponds.
- Eynsham's famous apple growing heritage (Wastie Apples) in more recent times, which is celebrated and revived in Eynsham by enthusiastic local volunteers.

Para 5.41: Constraints

6a) Do you agree with the site constraints we have highlighted above?

6b) Are there any particular issues we haven't mentioned that you think should be taken into account?

It is welcome that some of the constraints previously overlooked have now been acknowledged. However, some constraints continue to be downplayed, and others have been omitted.

Farmland

The most glaring omission is the presence on the GV site of productive, non-intensively farmed (including "best and most versatile") farmland.

To remind you, LUC's Spatial Options Final Report says of the assessed southern half of the site that the majority (77%) is Grade 3 agricultural land (not broken down into 3a and 3b), and 18% Grade 1 and 2. Grade 3a and above is the "best and most versatile" agricultural land, which LUC says "is considered to be a national resource and should not be lost". LUC's assessment is backed up by Natural England's Agricultural Land Classification (ALC) maps:

- Map ALC007 shows all the GV site as GOOD to MODERATE (Grade 3) with a significant area in the south of the site being VERY GOOD (Grade 2). Incidentally, the Gladman site is mostly POOR (Grade 4).
- Map ALC019 addresses the likelihood of 'Best and Most Versatile' (BMV) Agricultural Land (ie, Grades 1, 2 and 3a in the 1988 Defra classification). This shows that most of the eastern half of the GV site is MODERATE LIKELIHOOD, and a significant patch in the south is HIGH LIKELIHOOD. The Gladman site is LOW LIKELIHOOD.

The following is further evidence of valuable agricultural land on the GV site:

Magic Map (<http://magic.defra.gov.uk/MagicMap.aspx>) shows that most of the GV site has not been subject to an ALC survey. However, the area to the east of Lower Road has been surveyed. It shows three concentric crescents of land graded 3b, 3a and 2, on the opposite side of the road to New Wintles Farm. The crescents stop abruptly at Lower Road, where the survey ended. It is reasonable to assume that these areas of 3b, 3a and 2 do not stop at the road but continue, to an unknown extent, into the land west of Lower Road, in the east of the GV site.

Natural England's 'Guide to Assessing Development Proposals on Agricultural Land' says:

Developers and local planning authorities (LPAs) should refer to the [relevant] government policies and legislation when considering development proposals that affect agricultural land . . . They aim to protect the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals.

It goes on to say:

If there's not enough information from previous data [as is the case with the GV site], you may need to have a new field survey to plan for development or to inform a planning decision. You should use soil scientists or experienced soil specialists to carry out new surveys.

A full ALC survey will need to be carried out for the whole of the proposed GV site. This would seem to be essential, so that the best and most versatile agricultural land can be avoided by the development.

The latest version of the National Planning Policy Framework (NPPF) continues to recognise "the economic and other benefits of the best and most versatile agricultural land", and warns that:

Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land [such as the Gladman site] should be preferred to those of a higher quality.

Defra's '25 Year Plan for the Environment' declares on page 36: "The principal public good we want to invest in [post-CAP] is environmental enhancement". It goes on to highlight an example of a success story from Higher Level Stewardship (HLS) on a farm in North Suffolk. The whole of City Farm and all the farmland in the GV site that is farmed by the same tenant farmer has been under an HLS agreement and farmed organically for a number of years. Before that, it was farmed non-intensively for many decades, if not centuries. Hence the rich biodiversity (see below).

According to Natural England, just 13% of England's Utilised Agricultural Area (UAA) is farmed under "an HLS option" (email of 19 July 2018). It is perverse to elect to build such a large development on part of this comparatively scarce land, when there is another 87% of UAA to consider.

Defra's 'Health and Harmony: the future for food, farming and the environment in a Green Brexit' is full of proposals for a brighter future for farming, but it won't apply here, it seems, because none of the farmland will exist. It repeats the description in the '25 Year Plan' of farmers as "true friends of the earth"; but here they will either have been induced to abandon their calling or will have their tenancy terminated.

Biodiversity

Despite better references than before to biodiversity in the Issues Paper, WODC is still greatly downplaying the effect that the development will have. This land is not, for example, a disused industrial site crying out for an injection of new life, or farmland so intensively farmed that the soil has been severely degraded. It is a holistic ecosystem of varied and well established habitats and wildlife that is specific to the GV site and immediately neighbouring land, particularly to the north.

There needs to be a frank admission that achieving "a net gain in biodiversity" is not possible in such a species-rich interlocking of habitats, some of them rare, as exists here. You will simply be playing jenga with biodiversity: removing too many blocks of it before attempting to add new ones on top, which cannot prevent this particular tower of biodiversity tottering and finally collapsing. The best you can do is limit the irreversible damage, and try to create some new, though much smaller and less connected, habitat. The "numerous opportunities to conserve and enhance the natural environment" that you refer to in paragraph 6.118 will not be available if you destroy much of it.

You approvingly mention Wild Oxfordshire, which sets out four priorities for improving nature in the county – "more, bigger, better, joined". In contrast, this development will greatly reduce the size of the ecosystem, fragment it and make it less connected than before. The site is one wide green corridor now; a number of far narrower corridors can hardly compensate for that. It has also been sensitively managed for many years, so talk of better management is misplaced. (Linking Millennium Wood to Vincents Wood with a substantial strip of new woodland would be an interesting project to attempt, if the farmland there really has to go.)

The GV site contains threatened habitats and priority species that Defra's '25 Year Plan' is so keen to protect, conserve and increase. In relation to the Nature Recovery Network the Plan talks of the need to "require more habitat; in better condition; in bigger patches that are more closely connected". It seems that, where such conditions already exist, as in the GV site, they are not valued by the authorities. It is like a utility company that entices new customers with lower rates, while forgetting its long-term, loyal client base. Instead, the GV site should be regarded as a potential Special Protection Area or Special Area of Conservation, and should therefore, as the NPPF says in paragraph 176, "be given the same protection as European sites".

According to Defra's 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (19 July 2018), the breeding farmland bird population has been deteriorating since 1970, as has the relative abundance of priority species generally, and the status of pollinating insects. All strengths of the GV site. On a brighter note, "Since 2011, there has been a 40% increase in the area of priority habitat in target condition . . . largely due to the uptake of HLS management agreements outside of SSSIs" (page 23). But of course HLS-managed farmland here is due to be built over.

'Biodiversity 2020' says that plant diversity on enclosed farmland and in woodland has not been assessed (by government, presumably), nor habitat connectivity in the wider countryside; but thanks

to Plantlife, we know how important City Farm is in this respect. (Plantlife recently pointed out that 97% of our species-rich grasslands has been lost in less than a century, and now covers less than 1% of the UK.)

Two final warnings from 'Biodiversity 2020' which underline the counter-intuitive nature of the argument that the development will provide "a net gain":

- Habitat loss and fragmentation was identified by the Millennium Ecosystem Assessment as one of 5 direct drivers of biodiversity loss (page 36).
- The effects of habitat fragmentation can be compounded by changes in land use between patches (page 37).

As it says in paragraph 175a of the NPPF:

If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Let's hope that the GV is not being deliberately rushed through before the Environment Bill announced by Theresa May on 19 July 2018, can be enacted (with its legal framework of protection and establishment of a new environmental watchdog).

CONSULTATION QUESTION 7: Number of new homes

7a) Do you agree that 2,200 new homes is a reasonable 'working assumption' for taking *the AAP forward at this stage*?

7b) If not, can you suggest what number of homes you do think is appropriate for a site of this size and why?

Paras 6.6 to 6.8

2,200 is an overly ambitious amount of new homes given the site constraints. The retained farmland setting of heritage assets could consume 20% of the site. The buffer needed around the aggregates recycling plant at new Wintles Farm will account for another large area. It would be inadvisable to use this land for recreational, sports or educational uses as the plant emits a lot of dust and noise and some light pollution. There are copious other uses and demands proposed, eg:

- The homes at a density of say 30 per Hectare could consume 73 Hectares- at least 34% of the site (making 54% or more with the above). Then there is:
- Site roads and infrastructure
- Student accommodation
- Traveller site
- Schools
- Business Park
- Community centre, shops and facilities (eg, medical)
- Sports and recreation facilities
- Allotments
- Burial ground
- Open green space
- Park and Ride, etc.

2,200 may be possible if there was less land devoted to the business park, for which as yet no credible business case has been made.

There is a more viable site for 2,200 homes at Barnard Gate close to sustainable energy supply from the solar farm and without the heritage and biodiversity constraints, and no aggregate recycling plant! This should be taken seriously by WODC.

CONSULTATION QUESTION 8: Dwelling size type and tenure

8a) Do you agree that the AAP should provide an indicative range of dwelling sizes (market and affordable) to avoid being overly prescriptive?

8b) Do you think we should be looking to focus on any particular size of property in particular? If so, why?

Paras 6.9 to 6.14

It is very important that the type of homes and tenures chosen truly help people on lower incomes – affordable rents, shared ownership, self-build.

Eynsham Neighbourhood Plan (ENP) identified a need here for affordable smaller compact units for younger small households, such as studio apartments and smaller more spacious market homes for older downsizers, of which there is a lack in Eynsham. This combined with some supported retirement provision could free up family homes. This need was higher than in the rest of West Oxon.

Giving quite a large range – sometimes 10% – on the mix of dwelling sizes gives too much freedom to developers, who will tend to go for the mix that maximizes profits rather than addresses most need. It is better to narrow the range to reflect the needs identified in ENP (more 1 and 2 beds) and those of Oxford city.

CONSULTATION QUESTION 9: Dwelling types

9a) Do you agree that the AAP should be flexible in seeking a good, overall balanced mix of dwelling types rather than setting a specific requirement for certain dwelling types?

9b) Do you have any other views on the type of new homes that should be built at the garden village

Paras 6.15 to 6.17

There should not be too much flexibility for developers. They will prefer to make more profits by building large detached, expensive, executive homes.

In relation to Question 9b):

1. There is an argument for design that reflects Eynsham's character and that might fit more naturally into the environment as a result.
2. A nucleic settlement with more terraced and semi-detached homes as at Eynsham, with fewer large detached houses, centred round a community heart of village square or green allows easy walking or cycling to shops and services.
3. Higher densities could be achieved with lower land take. More open green space could be provided around the village and this might enable a better countryside buffer between the GV and Eynsham. It would give residents of both settlements readier access to open countryside.

4. Flats should be kept low rise and to a minimum in a rural setting. Those built at Merton Court or Hazeldene Close, for example, blend well with the surrounding houses.
5. Innovative design could make better use of valuable land without increasing heights, such as incorporating basement accommodation especially on split level sites using skylights, sun pipes, etc., bedrooms and bathrooms on lower floor and living rooms on the ground level. Thermal gain from the ground would make them more eco-friendly as well.

CONSULTATION QUESTION 10: Affordable housing

10a) Do you agree that (subject to viability considerations) the Council should aim to secure 50% of the new homes at the garden village as 'affordable'?

10b) Do you have a view on the type of affordable homes that should be provided? Should there be a particular focus or should there be a more balanced mix of different affordable housing types?

10c) Are there any other comments you wish to make in relation to affordable housing Provision

Para 6.18 to 6.22

Yes: it is very important that the AAP secures 50% of GV new homes as genuinely affordable. The Council should aim to achieve land value capture in accordance with GV principles. Not only should this be used to fund infrastructure provision but also to subsidise affordable housing.

Para 6.21: high priority should go to affordable rented and shared ownership. The 2:1 ratio is a good one. Oxford City can aim for a higher ratio as prices there are much higher. At this out of town location lower prices should make it possible for more people to aspire to buying a small starter home.

Preferably the age restriction for starter homes should be removed. In our changing society many people find themselves starting on the housing ladder later in life.

20% discounted market sales should also be capped at £250,000. If such buyers can afford higher-priced properties, they should not qualify for the 20% discount.

Yes: there should be an emphasis on helping essential local workers, who are often low paid and much in need of homes close to work.

Question 10c): affordable housing should be mixed in with the market housing to avoid stigma and a "ghetto culture".

CONSULTATION QUESTION 11: Meeting specific housing needs

11a) Do you support the requirement to provide 5% of housing for the purposes of custom/self-build housing?

11b) Do you support the requirement to provide 25% of new homes as accessible and adaptable properties which could also include 5% wheelchair adaptable homes?

11c) Do you think we should be looking to provide specialist accommodation for the elderly and/or those with a disability as part of the overall housing mix at the garden village?

11d) How can the type of new homes provided best meet the needs of young people and households with children?

11e) Would you support in principle the idea of providing new student accommodation within the garden village?

11f) Should there be a particular emphasis on meeting the needs of essential local workers (i.e. those who provide frontline services in areas including health, education and community safety)? How can this best be achieved?

11g) Do you think the garden village is a good opportunity to address the needs of the travelling community

Paras 6.27 to 6.37

- The provision of 5% community or self-build plots is a good one. It could offer another route to affordable home ownership.
- The mix of residential accommodation for older/disability groups is sound. ENP identified a higher than average West Oxon need for this.
- The 25%/5% accessible and adaptable/wheelchair adaptable homes is sensible.
- The Eynsham area needs purpose-built elderly/disabled/extra care/sheltered homes close to local facilities.
- Smaller terraced homes with no front but generous rear gardens would be good starter homes for younger families.
- For ENP Eynsham businesses identified a need for the type of accommodation as described for students and young people embarking on careers, in order to aid recruitment and apprenticeships. It could be accommodated as part of a campus-style low-rise business park? Hi-rise flats or business premises would be very incongruous in this rural setting. Partial innovative use of below ground would be energy-efficient and do away with the need to build high.
- Homes for essential local workers should be provided too.
- Provision of a traveller site is needed but it will require careful siting and design. Perhaps close to the existing Cuckoowood Farm site.

CONSULTATION QUESTION 12 : Residential space standards

12a) Do you support the idea of introducing 'minimum space standards' for new dwellings at the garden village?

12b) If such standards were to be introduced through the AAP, should these be the Government's nationally described space standard or something set more locally?

12c) Alternatively do you think this issue should be left to the developer to determine through any subsequent planning application/s for the garden village site?

Paras 6.38 to 6.39

It is essential to set minimum space standards. A lot of speculative developments in recent times have very poor space standards and the government minimum (97 square metres with 3 square metres of storage for 5 people in a 4-bed home) is not exactly generous either.

Do not leave it up to developers. The minimum standards should be raised moderately. Extra consideration should be given to outdoor storage too for bicycles, mobility scooters, prams/buggies, clothes drying areas.

CONSULTATION QUESTION 13: Housing delivery

13a) Do you agree with the principle of the AAP encouraging a large number of different developers including small and medium-sized builders to potentially increase competition, innovation and speed of housing delivery?

13b) Do you support the concept of 'off-site' construction to help increase the speed and efficiency of new housing delivery at the garden village?

13c) Are there any other measures we could seek to introduce through the AAP to help increase the rate of housing delivery?

Paras 6.41 to 6.44

Question 13a): Having a range of small and medium housebuilders is a good idea as well as the larger developers. It would produce a more natural, eclectic mix of homes for the individual to choose from. Big developers tend to have a pattern book approach meaning less of a local sense of place. Smaller developers can be more flexible and react more quickly. Might they be less likely to delay building by land banking to force prices to rise? That is debatable. A healthy mix of different builders may make this less likely to happen.

Question 13b): Modern construction methods have many advantages:

- They can be distinctive if designed in a modest style that blends with the more traditional in other parts of the GV. The scale must be kept domestic.
- Modular methods can be innovative and more energy-efficient. Much higher standards of energy efficiency can be achieved if measures are cheaply incorporated at the design stage where retrofitting would be expensive.
- There is far less use of land-won cement and aggregates avoiding the need for mineral extraction that threatens so much of the local countryside.

Question 13c): The council needs to include social housing providers and community cooperatives or non-commercial builders in the mix.

CONSULTATION QUESTION 14: New business land and other commercial opportunities

14a) Do you support the idea of creating a new, high quality 'campus-style' science park as part of the proposed garden village?

14b) Alternatively, would you support a more 'dispersed' approach whereby a number of smaller parcels of business land would be provided across the garden village site, closely integrated with new homes and other supporting uses?

14c) Are there other ways we should be looking to create new business investment opportunities through the garden village proposals?

14d) Do you support the idea of providing mixed-use 'hubs' or 'clusters' of different uses including commercial (shops, cafes etc.) combined with community, health and education uses to promote vibrancy, social interaction and efficient use of land?

The planning and design of the GV must have integrated land use, transport and community planning to reduce the propensity for car travel (need and desire) and to increase the propensity for walking, cycling and public transport. There should be a continuous active programme of demand management for homes and work places to reduce the number of car trips, length of journeys, single purpose trips and single occupancy. Management should, in parallel, focus on equality of mobility for residents (GV, Eynsham and West Eynsham) by sustainable modes. Travel is determined by desire rather than need. P Headicar's research has shown that the propensity to choose the nearest destination for a particular activity is weak. This propensity will be stronger because of the Oxford identity of overspill residents.

A quantitative balance of homes and job opportunities is a necessary but insufficient basis for a "balanced community". P Headicar's research has shown that the numerical balance of jobs and homes in the Growth Towns is only notional because of the actual dispersed commuting patterns and the increasing attraction of Oxford for jobs, services and recreation. Residential location,

especially in Central Oxfordshire, is often determined by residents' financial ability to acquire housing rather than spatial proximity to employment.

Dispersal or concentration of employment should be guided by the need for sustainable movement within and without the GV. Density, layout and network pattern should locate jobs, facilities and services to be within walking and cycling distance of homes, and for convenient routing of bus services. Optimum density of places and activities is a key decision of urban form. The internal network grid should be permeable, thereby fostering walking and cycling and discouraging car use.

Para 6.68

The intention to reduce unsustainable travel is laudable; achievement is doubtful.

All research shows that the macro location of new development is more important than the micro design in enabling sustainable travel. The GV is not only in the wrong place (not part of a large settlement) and not on a sustainable transport corridor, but would be a remote suburb of Oxford (urbs in rure). As an Oxford overspill, most of the future residents' spatial connections to job, services, recreation, family and friends would be Oxford. The residents' spatial knowledge ("mental map") and loyalty would be to Oxford.

CONSULTATION QUESTION 16: Reducing the need to travel

16a) Are there other ways in which the AAP could help reduce the overall need to travel?

See strategic comments above for Question 14. The GV should be fully networked with the highest speed digital connectivity, co-located jobs and homes and shared work home.

CONSULTATION QUESTION 17: Reducing dependency on the private car

17a) Should the AAP include within it a specific car parking strategy addressing issues such as parking management, restrictions and standards?

17b) Do you think that the garden village should be based on more robust car (and cycle) parking standards than standard residential development to help promote a stronger degree of 'modal shift' away from the use of the private car?

17c) Do you support the idea of establishing a 'car-club' at the garden village to allow people who do not want to own a car (or a second car) to access one whenever they need to?

17d) Are there any other measures which could be introduced through the AAP to help to reduce dependency on the private car?

Off-road cycle routes should be built to Hanborough Station, eastbound and westbound on the A40 and from Eynsham to Botley (<http://b4044path.org>). These routes should be connected to the Oxford cycling network.

Improved rail services at Hanborough Station.

Convenient direct access to high frequency, predictable and comfortable bus services to Oxford (centre, Headington and East Oxford).

Apart from part of a cycle route to Hanborough Station, most of these sustainable measures would have to be provided by other parties. However, the GV should fund these measures through the existing off-site contractual planning measures (eg, S106 agreements). The proposed network improvements of central and local governments are intrinsically inadequate and will not address the

travel needs of existing residents along the A40, let alone the new residents of West Eynsham, Carterton, Witney and Oxford North (Gateway). The proposed bus lane stops before Duke's Cut; Cutteslowe roundabout will be more congested; and bus services focus on the nucleated centre of Oxford and cannot easily serve a dispersed pattern of origin and destinations around Oxford. The proposed infrastructure funding from central government is not certain, is inadequate to resolve the current and future movement problems, and should be part of an integrated and comprehensive transport and land use strategy for Central Oxfordshire.

CONSULTATION QUESTION 18: Active travel

18a) Do you agree that the garden village should be based on the concept of well-connected, 'walkable' neighbourhoods?

18b) In considering the opportunities to improve or extend existing public rights of way in and around the site, are there any specific routes that should be given priority (eg, connections to surrounding villages, into Eynsham, along the A40)?

18c) Do you have any specific ideas for new routes that should be provided to promote active travel? Do you support the idea of a new pedestrian/cycle link to Hanborough Station along Lower Road?

18d) In terms of connections across the A40 are there particular points that should be prioritised for new or improved crossing points? Do you have a view on the type of crossing that should be provided (e.g. bridge, underpass, surface-level)?

Question 18a): Excellent.

Question 18b): To the A40 and Eynsham are priorities.

Question 18c): A new cycle path to Hanborough should be direct, safe, convenient for residents (and workers at the science park) and therefore off the highway.

The cycle path on the A40 should be improved (wider, better surface, etc) and be aligned with the highway flow east- and westbound.

The GV should fund provision of the Eynsham – Botley walk and cycleway. There should be a segregated cycleway from the GV to and from the Toll Bridge.

Question 18d): Connection from the GV to Eynsham is a difficult problem because of the pollution, noise and danger of crossing the A40, and the need for pedestrian and cycle access to the secondary school and Eynsham's facilities. Car access must be discouraged in all ways. It would be a prevalent risk during the early stages of development.

The best, and most expensive, solution would be to re-route the A40.

Of the crossing choices, a well-designed safe underpass is probably preferable. Innovative design solutions would help connectivity and permeability.

CONSULTATION QUESTION 19: Public transport (bus and rail)

19a) Do you have any thoughts on the proposed park and ride site west of Cuckoo Lane acting as a comprehensive 'transport hub' supported by a range of complementary uses such as 'click and collect'?

19b) What new bus services if any do you think should be facilitated by the AAP/garden village?

19c) How can the AAP help to improve the attractiveness of existing bus services?

19d) Apart from the potential provision of a new pedestrian/cycle link to Hanborough Station along Lower Road, are there any other ways in which greater use of Hanborough Station could be encouraged?

19e) Are there any other factors we have not mentioned that the AAP should focus on to promote increased use of public transport?

Question 19a): Park and Ride as a hub would be an innovation for the proposed outer ring of park and rides. The existing peripheral park and rides are now considered transport hubs rather than ways of encouraging a mode shift from car to bus to reduce traffic within Oxford (and to protect its environment, heritage areas and buildings while enhancing the vitality and viability of central employment and facilities).

Research has shown (WS Atkins) that Park and Rides do not reduce aggregate car mileage or journeys. Car owners drive to a park and ride rather than using the scheduled commercial service between home and destination.

The two most important factors fostering mode shift at a Park and Ride, apart from the attitude of the car driver and workplace parking, is a dedicated segregated bus route to and from their destination. And secondly, a location at the end of the traffic queue. The Park and Ride service must be faster, more comfortable and more predictable compared with a car. The proposed bus lanes (eastbound and westbound) do not fully meet these mode shift criteria unless and until there are bus lanes between Duke's Cut and the Cutteslowe roundabout, and bus priority at the roundabout (made much more problematic by the Oxford North proposal for jobs and homes).

For car users, an eastbound link from the A40 to the A34 would reduce eastbound traffic at Duke's Cut.

The Park and Ride should also serve the Botley access to Oxford. A dedicated bus lane along the Eynsham eastern bypass to the Toll Bridge would encourage bus use from the Park and Ride and Eynsham (existing and proposed West Eynsham).

Public transport should systemically assess all existing and future development in the A40 corridor.

Question 19b): The main existing bus services (S1 and S2) serve north, central and west Oxford. The city's biggest employment growth is in the east. Increased demand could support direct services to the Headington hospitals and east Oxford.

There should a regular feeder bus service from West Eynsham, Eynsham and the GV to Hanborough Station, which should be enlarged and with increased service capacity and frequency (not within the gift of the GV developer).

Question 19c): Increased attractiveness of existing services: connect West Eynsham, Park and Ride and GV with walkable, convenient and sheltered stops.

Questions 19d and e): See above.

CONSULTATION QUESTION 20: Making more use of technology

20a) Do you agree that the AAP should explore the use of new technology to assist with 'smart travel'?

20b) Do you have any specific suggestions as to how new technologies could be usefully employed?

Question 20a): Yes; for example, dial a ride for Hanborough Station (see trial in East Oxford) with route and cost optimisation functionality for residents and in-commuting workers.

Question 20b): Yes: for example a web/smart phone based app for real time information on the nearest bus service and stop in West Eynsham, Eynsham and GV.

Car share and car clubs (again app based real time functionality).

Para 6.107

Dualling the A40 from Witney to Eynsham is a technical cost-benefit decision. Road capacity is not the cause of congestion, lost time and pollution. The delays/free flow of junctions (traffic signals and roundabouts) determine the traffic speed and congestion on the A40. Dualling the A40 from Eynsham to Oxford should be resisted.

CONSULTATION QUESTION 22: Highway improvements

22a) Do you support in principle the provision two new roundabouts on the A40? What, if any concerns would you have about this?

22b) Should each roundabout facilitate access to both the garden village and the West Eynsham SDA?

22c) Do you agree with the draft Eynsham Neighbourhood Plan that consideration should be given to the rationalisation of existing junctions (for example the junction of Cuckoo Lane onto the A40)?

22d) Do you agree with the draft Eynsham Neighbourhood Plan that improvements should be made to the existing roundabout at the junction of Lower Road and the A40?

22e) Do you support 'in principle' the provision of a connecting 'spine' road running through the garden village from Cuckoo Lane to Lower Road?

Question 22a): New roundabouts: in principle, increasing the number of interruptions along the A40 corridor should be resisted. The decision should be taken after robust traffic and network modelling of those options that are safer, less polluting, more convenient, encourage sustainable transport and reduce congestion.

Question 22b): Probably.

Questions 22c and d): Yes.

Question 22e): Spine road: agnostic; again only after robust network, traffic, environmental and sustainable travel modelling of options for existing and future residents and workers.

CONSULTATION QUESTION 24: Green infrastructure

24a) Do you agree that the AAP should include guidance on green infrastructure and, if so, what should be the form of this guidance – broad strategy and principles only, with the detail coming as part of the outline planning application, or more detailed masterplan at this stage and the use of standards?

24b) Do you think the AAP should stipulate a requirement to achieve a recognised benchmark, such as Building with Nature?

24c) Are there any other issues which you think are important regarding green infrastructure and should be addressed through the AAP?

Overall, it is **good to see that the strong, evidence-based link between the natural environment and health and well-being is recognised in this document**, particularly in relation to the importance of woodland and trees (para 6.132). However, open vistas, grasslands and meadows are equally important and should have more prominence in the AAP.

There is a body of research (eg, Barton & Pretty, 2010) that demonstrates that being in nature provides an important health service. The Japanese government carried out “extensive scientific research which found that a two-hour forest-bathing session [no water involved!] could reduce blood pressure, lower cortisol levels and improve concentration and memory. Their findings went beyond the usual correlations between fresh air, exercise and wellbeing. They found that the chemicals released by trees, known as phytoncides, could have an anti-microbial effect on our bodies, boosting the immune system. As a result of this research, forest bathing, or *shinrin-yoku*, was introduced as a national health programme.”

(<https://www.theguardian.com/travel/2018/may/06/japanese-art-of-forest-bathing-comes-to-england-holidays>)

Therefore, the **AAP should retain large areas of diverse, natural landscape as well as create new green infrastructure** using the existing natural features. This could be achieved by having a high density of housing as in Eynsham, leaving more open natural spaces.

Question 24a): Yes, definitely, guidance should be included and legal requirements set out. However, until the **in-depth surveys of the northern part of the site** are carried out in relation to the potential constraints of the medieval village of Tilgarsley, exceptional biodiversity, rich farmland, listed buildings and the recycling plant, detailed planning should wait. These constraints must be assessed and protection set out first. **Evidence-based standards should be used at that point for masterplanning.**

Question 24b): Yes, especially benchmarks that are concerned with health and wellbeing, **retaining natural landscape and vegetation for active travel and recreation**, as well as designing new green infrastructure.

Question 24c): Be mindful of 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. Along with growing up more healthily and having more fun, being in nature helps them 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 wellbeing of future generations, and are more interested in making huge profits now by destroying the natural environment.

At the other end of life, **many Eynsham residents wish to be buried in Eynsham but the burial ground is full** and there is no space to create another. **We recommend that a green burial site be created next to the Millenium Wood.** Many residents walk in the wood, so this site would feel part of Eynsham, as well as extending the tree canopy of the wood to create a 'green' corridor. **A 'win/win' situation** would result in health gain through peace of mind and useful green infrastructure being designed.

Moreover, **connectivity is essential**, which means more than just corridors – there should be meaningful connections between areas. We strongly support tree-lined streets tree/hedge-lined

paths and cycle routes, using forest scale trees rather than small ornamentals, with native trees extending into countryside to improve connectivity and integration, as well as flower-rich meadows and edge habitats. The **AAP needs to contain an outline strategy**, for example, the balance of built area/greenspace – both communal and (limited) private space.

Reference

Barton J & Pretty J (2010) What is the Best Dose of Nature and Green Exercise for Improving Mental Health? A Multi-Study Analysis..*Environ. Sci. Technol.*, 2010, 44 (10), pp 3947–3955

CONSULTATION QUESTION 25: Design

The garden city principles below are welcome, but we are concerned that the highest standards are adopted and enforced and that wherever possible interventions benefit the area as a whole. Incidentally it is hard to see how the development will be able to 'enhance the natural environment' when much land of high value to wildlife, including an organic farm, will either be built over or adversely affected by nearby construction.

Relevant garden city principles.

*Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.
Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.*

We support the development of a design code to require the highest standards in construction and performance. However, these should not be so prescriptive that they prevent innovative and distinctive design and technology. There is a concern that the garden city principles could lead to sprawling suburban development and urge that high density solutions should be included to minimise the built footprint. Recent government changes have reduced construction standards and we suggest that housing be built to Passivhaus standards with the lowest possible embodied energy. The approach to Zero carbon construction should be 'cradle-to-grave' from construction and the lifetime of the building, with measures delivered on site. Consideration should be given to local, low energy or renewable materials, but without encouraging a pastiche of traditional Oxfordshire design. Due to the high value of housing in this area, such measures would be a relatively low part of the cost and would benefit occupants and the country's commitment to the Climate Act. The (withdrawn) Code for Sustainable Homes Level 6 (the highest standard) is a useful point of reference.

CONSULTATION QUESTION 26: Sustainable design and construction, renewable and decentralised energy

We think the AAP can be more ambitious on these aspects in terms of construction, as outlined above, and energy. It should go beyond the requirement for an 'Energy and Sustainability statement' or 'energy feasibility assessment' (draft Policy EH4 of the Local Plan) and require an integrated strategy to deliver renewable and decentralised energy.

Eynsham was host to the Low Carbon Hub's first community-owned PV installations as part of the Peoples' Power Station, and we are keen for this concept of clean energy for community benefit to be extended in any new development. There is exceptional local expertise; the pioneering work of

the Oxfordshire Low Carbon Hub, Oxford University's Environmental Change Institute; and world-leading research and local businesses such as Siemens developing smart control technologies. Capture of solar energy should be integrated into construction as standard, not as an add-on. PV can economically create the enclosure of buildings and it is important that this includes commercial and community as well as residential. There is the opportunity to work with local experts in delivering renewable or decentralised energy systems with on-site storage and a local grid. With Passivhaus standards domestic energy use will be low; new development could be a net energy exporter to the rest of Eynsham. This could offer benefits to existing residents which encourage greener behaviour, eg providing free electricity to electric car and bicycle users or other desirable behaviour changes. If these measures were fundamental to the concept, in conjunction with attractive, green transport infrastructure, there would be an opportunity to make it a showcase for carbon neutral, and healthy, development.

CONSULTATION QUESTION 27: Heritage and culture

27a) Do you agree that the garden village should draw on opportunities to better understand the past and reveal the significance of heritage and cultural assets?

27b) What do you think should be the main heritage/cultural priorities in taking the development forward?

Paras 6.165 to 6.171

Question 27a): Yes, the GV must enhance understanding of the past both for the interest and pleasure of residents in both settlements and for the advancement of historical knowledge and understanding of the past.

The GV site includes some seriously important heritage assets. The Deserted Medieval Village (DMV) of Tilgarsley is referenced by nationally acclaimed authors such as Philip Ziegler (The Black Death) and represents a time capsule dating to the period of the Plague in the mid-14th century. The Eynsham Abbey Cartulary records that the village was completely deserted by 1350. This is very rare for DMVs, most of which are slowly reduced in population and remain partially inhabited sometimes for centuries.

The ancient Salt Way (which brought salt from Droitwich to Eynsham wharf as early as the Roman period) becomes a "Hollow Way" immediately to the west the DMV site. Further investigation is warranted.

There may be more evidence of earlier (Bronze Age?) land uses as similar sites were discovered nearby and excavated in the past prior to mineral extraction.

Question 27b): The main priorities should be:

- Detailed archaeological work must be done across the site including such methods as magnetometry, resistivity, ground penetrating radar, Lidar, aerial photos of crop marks in dry weather, trial trenches and full excavation, for example at the DMV site.
- Opportunities should be seized to present and interpret the results of excavation. An archaeological trail with information boards and reconstructions such as the Eynsham Abbey Fishponds trail would be an excellent opportunity.
- The agricultural setting of the Listed Buildings at City Farm must be preserved with a 500 metre buffer of farmland.
- Land needs to be provided by the development or money provided for off-site provision of an Eynsham area Museum. This could accommodate extensive collections now in storage relating to the Abbey and the Eynsham area, as well as finds from the GV site.

S106/CIL funding should also be set aside to help with construction costs. There is an active “Eynsham Museum Fund” raising money now and an enthusiastic team of volunteer helpers in the village.

HEALTH & WELLBEING

Whilst we recognise that the natural environment, designed green infrastructure and active travel are intended to be fundamental to the AAP and that links are made to health and wellbeing throughout this issues document, ***we must be assured that this emphasis is carried over into the AAP.***

One feature not mentioned in the document is ***active travel in the form of kiddie trailers*** for transporting several children with one bike. These are used in the Netherlands, for example, and enable parents to take their children to play groups/nurseries on their way to work. They can also be used to take allotment produce home or carry heavy loads of shopping. So cycleways and footpaths need to be wide enough not only for mobility scooters, but also for these trailers.

If ***active travel routes are surrounded by natural countryside and designed green infrastructure***, the whole experience will bring about healthy exercise and feelings of wellbeing from connection with Nature, as well as social, inter-generational interaction with other walkers and cyclists. Children also get used to walking to school and to the community centre. We know this from our experiences of living in a walking community and we experience it as ***engendering a strong community spirit.***

On the negative side, air pollution from the already congested A40 and the aggregate recycling plant in the middle of the site has not been considered within this health and wellbeing section. The AAP must be based on ***up-to-date air and noise pollution surveys along the A40 and around the recycling plant.***

Air pollution is mentioned in the introduction (para 3.16) as below the national average, but when and where were the measurements taken? How up-to-date are these records in the light of a huge increase in the amount of traffic passing Eynsham daily (30,000–32,000 vehicles per day according to Oxfordshire County Council (OCC) figures) and increasing rapidly with development along the A40 corridor. Certainly cycling and walking along the A40 is not a pleasant experience today for current residents or active travel commuters (who often wear masks).

In addition, Eynsham ***people who live in Spareacre Lane, Greens Road and Hanborough Close*** and whose gardens back directly onto the A40, experience both air and severe ***noise pollution.*** Since OCC recently reduced the density of the shielding trees and bushes on the highway edge, the noise pollution has not only increased, but also people on buses and lorries have clear views into some residents’ back gardens and windows. None of this is healthy and certainly does not enhance wellbeing.

Therefore the AAP must ***ensure that innovative air and noise pollution reduction and mitigation measures are taken and enforced*** for Eynsham and the so-called garden village residents. For example, the mitigation measures around the recycling plant could be fields of solar panels with wild flowers and sheep grazing beneath and between the panels. At least the sheep could move on, whereas mitigation measures such as building workshops, hubs or offices would mean that people were exposed to pollution at work or during their use.

CONSULTATION QUESTION 28: Food production and consumption

28a) Do you agree that the garden village should make provision for people to grow their own food such as allotments and community gardens?

28b) Do you support the concept of 'edible streets' with fruit, vegetables, herbs and spices grown in public spaces and available for all?

28c) Can you think of any other ways in which the garden village could actively encourage the production of food locally?

28d) Do you think the AAP should be seeking to influence food choices and opportunities within the garden village (eg. avoiding hot food takeaways close to schools)?

Question 28a): Yes, as set out in the Eynsham Neighbourhood Plan (ENP). (NB: We have enough allotments in Eynsham for the current population; and in the ENP, we made provision for new allotments on the west for new development there. If you can find space in Eynsham, a new community garden would be great. **It would not make sense to build allotments and community gardens on the north of the A40 for new and existing residents on the south (as suggested by Cllr Jeff Haine)** who would have to cross the A40 by foot or cycle and sometimes by vehicle for heavy loads like compost and harvested produce.

Question 28b): Yes, **we would like to see this ethos carried over to development on the north**, should it go ahead. We already do this in **Edible Eynsham**, for example, GreenTEA (Transition Eynsham Area) members grow tomatoes and Swiss chard organically in pots in front gardens near the pavement for people to pick as they pass and herbs in Eynsham Square. Involving residents, they have planted local Wastie apples around the village (Eynsham used to have eight orchards). They organise and run an autumn Apple Festival, contribute to the community-owned Peace Oak Orchard and share private vegetable plots and gardens. **Other thriving Eynsham groups** include the Allotment Association, a garden club, Oxford organic gardening group, a village show and open gardens. We have an excellent **independent local vegetable and organic shop and popular Women's Institute country market**. There would be **plenty of knowledge and experience to share** with new residents to the north to encourage a love for local, healthy and seasonal food.

Questions 28c & d): **Ambitions for the garden village could also go further** because of the resources there, for instance, dedication of organic farmland as a community farm, small orchards, forest gardening and permaculture living architecture (green roofs/walls).

Moreover, given that the soil in the garden village is chemical-free and probably the best in West Oxfordshire, **restrictions should be put in place to keep the allotments, community gardens and private gardens herbicide- and insecticide-free**. This should be built into the contracts and regulations for all housing and business premise developments. **WODC would not be allowed to use chemicals** on footpaths, pavements, green and public spaces. Natural landscape and designed green infrastructure should also be kept chemical-free by the community trusts or whatever organisation is created to care for them.

In addition, these **growing spaces should be managed to encourage a wider range of biodiversity of plant and animal life**, but not introduce vegetation that would destroy the precious and rare arable plants already there. **Beehives** should be encouraged too for cross-pollination purposes, as well as, **habitats for wild animals, hedgehogs, birds, insects and reptiles** like the **existing, rare great crested newts that live on the site**.

Care of these spaces should involve community members who wish to contribute. Such **co-operatives engender wellbeing and a sense of belonging to a vibrant community** that cares. They can also stimulate collaboration in setting up organic food markets and cafés cooking with the produce for local people. These could be set up in the multi-purpose social and community hubs run by the community and/or near the schools instead of fast food take-away stalls! Our Emporium in

Eynsham uses produce from the organic Market Garden over the road and is full of young parents with their pre-school children after the school run in the morning and after picking up their primary school children in the afternoon. If the market is set in a community garden, this is also the perfect spot for an organic café.

CONSULTATION QUESTION 29: Education, healthcare and community infrastructure

29a) Do you have any initial thoughts on the potential provision of two new primary schools (each up to 2 forms of entry) within the site? Do you think this would be preferable to a single, larger primary school site?

29b) In terms of secondary provision, would you support the provision of a second site for Bartholomew School within the garden village to free up additional capacity at the main school site in Eynsham? If not, why not?

29c) Do you have any other suggestions as to how additional pupil places at primary and secondary school levels could be provided?

29d) Would you support in principle the provision of a new healthcare facility within the garden village? If not, why not?

29e) What other forms of community/social infrastructure should the garden village be looking to provide or contribute towards?

Question 29a): **Two small primary schools are preferable as more parents would probably use active travel routes** to take and pick up their children. Also, the **first small school could be built before any of the houses are built**, so the first inhabitants have somewhere for their children to go to school without having to use road, bus or rail, thus promoting their health and wellbeing. One larger school would make it more likely that parents or grandparents would get in their cars as the distance could be too far to walk in terms of distance and/or time. However, they could cycle if the paths are ready and the school has enough racks to accommodate the children's bikes.

Question 29b): Yes, this is essential. Bartholomew will be at full capacity with the new students from the developments that have already started to the west of Eynsham. However, it is **unlikely that a second Bartholomew site in the so-called garden village could be entirely self-sufficient**.

Question 29c): Eynsham Primary School is in great need of redesign and refurbishment. There is wasted space in the current design. **Only if the school is improved and added to could it take more children** from the north.

CONSULTATION QUESTION 30: Social interaction and early delivery of health infrastructure

Delivery of health-promoting infrastructure and **all kinds of infrastructure should be early** – unlike the usual housing developments in the UK, including the Bicester development that you use as an illustration of good practice in this document.

30a) Do you agree that the AAP should be encouraging the provision of shared buildings, spaces and facilities to promote social interaction between different age groups and engender community spirit?

Question 30a): Yes. It works well in Eynsham.

30b) Do you think it is a good idea to appoint a community development worker or similar in the early stages of the garden village to assist with social integration and activity?

Question 30b): Sounds like a very good idea.

30c) Do you agree that the AAP should place a strong emphasis on safe and accessible environments (buildings, spaces, routes) to encourage social interaction and reduce the opportunities for crime and the fear of crime?

Question 30c): Absolutely.

30d) Do you agree that the AAP should emphasise the need for early delivery of health promoting infrastructure to instil healthier habits from the outset?

Question 30d): Yes, once habits are established, newcomers tend to absorb them as cultural norms.