



EYNESHAM PARISH COUNCIL

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

Telephone: 07956 901622 Email: epc.clerk@eynsham-pc.gov.uk Web: www.eynsham-pc.gov.uk

Rosemary Morton
Programme Officer
c/o Planning and Strategic Housing
West Oxfordshire District Council
Elmfield, New Yatt Road,
Witney, OX28 1PB

Emailed to - rosemary.morton@publicagroup.uk

6 April 2022

Dear Rosemary Morton

Salt Cross Garden Village Area Action Plan (AAP) – Phasing of Infrastructure Delivery

These remarks relate to the additional work on the WODC EXAM 10 - The Council's suggested redrafts of AAP Policies 13-17 and EV36 - Salt Cross Garden Village Phasing Report, as follows:-

1. Overview

- 1.1. The documents fail to acknowledge the existing community of Eynsham. This is in consideration of the impact on infrastructure phasing being created (in terms of the existing community needing to use those services) or in the case that the infrastructure is not phased at the right time (and therefore new residents will be using the existing community's infrastructure).
- 1.2. The phrasing of the title 'Eynsham Area IDP' or 'the study area' fails to identify that Eynsham already exists. Furthermore, a Phasing Report if not AAP as well, should have been produced to address the collective impact of Salt Cross Garden Village (SCGV), West Eynsham Strategic Development Area and A40 'Improvements' so that joined-up planning could take place.
- 1.3. The phasing report identifies rather abstract 'stages' but acknowledges that the build out time (estimated at 14 years) is effectively in the hands of developers. For those infrastructure elements that particularly impact on the existing community, such as health, education and library provision, the Council would like to see phasing deadlines set as concrete dates, rather than just tied to a particular stage to provide assurances that a planning blight will not fall on plans as consultation on new health care facilities for example.
- 1.4. In these examples we would also like there to be specific acknowledgement that community consultation needs to be prioritised for stage one of the build.

2. Key Stages in the Anticipated Trajectory

- 2.1. The Parish Council is disappointed that the AK Urbanism Report indicates that the District Council will allow the actual timing of phasing and the anticipated trajectory of build entirely with the developers. The Parish Council believes that too much responsibility is being given to the landowners and developers to ensure the build-out of the development is undertaken efficiently and with the existing community and the newly developing community of Salt Cross in mind. There will be a period of 10-14 plus years of development disruption and impacts on the community which is unacceptable. The lack of control is amplified when phasing of infrastructure is developer/land-owner driven. It is for this reason that we argue that the phasing of infrastructure should be more conservative and be committed to earlier than is specified in the plan.
- 2.2. The Parish Council is particularly concerned that the phasing plan doesn't have contingencies with regard for infrastructure in the case of an incomplete build out of the full 2200 homes. With so much infrastructure weighted to later stages of the development of SCGV there is a danger that the community will be left without vital assets if the development is slowed for whatever reason.

3. Energy

- 3.1. Given the Government ambition for Garden Villages and the Climate Emergency, the Parish Council believe that the absence of any reference at all to local Energy Generation Initiatives is a major and serious oversight.
- 3.2. Surely any phasing of infrastructure on site should include options for local community-led energy generation, district and community heating schemes. It seems perverse that all of the work that has gone into the Eynsham Smart and Fair Futures initiative as part of Project LEO (Low Energy Oxfordshire) is ignored in this Phasing Report when this is exactly the sort of infrastructure input that needs to be in place from the beginning of the build and will mark out Salt Cross as a Garden Village rather than just another housing development

4. Community Development

- 4.1. The Parish Council believe that creating a separate Garden Village Development Trust will not be in the best interests of the Eynsham and Salt Cross communities where there will inevitably be a great deal of shared asset use across the two communities. The Parish Council is in a good position to take responsibility for the management of existing and new community assets in the best interests of both communities.

5. Library & archives and health & social care

- 5.1. The Parish Council is disappointed that there is no commitment as to what should happen to current valuable community amenities such as the Eynsham Library and GP's Surgery. There are therefore no impact assessments, any safeguards or investment options for the benefit of existing and new residents identified in the Phasing Report.
- 5.2. Given that the Phasing Report only offers the option of consultation, the Parish Council wish that engagement and planning with the appropriate authorities are phased to begin at the earliest possible opportunity of the development. This is to ensure key decisions are right from the outset for both the existing Eynsham community and the developing Salt Cross community rather than infrastructure investment decisions to be phased according to profit available.

6. Indoor sports and leisure

- 6.1. Earlier investment in sport and leisure infrastructure that could be accessed by the existing community would be a fair recompense for the many years of disruption that will be felt by local residents from a decade plus of development on their doorstep.

7. Education

- 7.1. Education provision should be phased earlier to avoid the need for pupils to be taught in Portakabins which are sub-optimal and should not be used. This will be a negative selling point for potential new residents of the SCGV.
- 7.2. Crossing points on the A40 must be prioritised and in place before new school provision is built to allow safe movement of school pupils across the A40. The Parish Council does not support an underpass being the appropriate way to link up the north and south sides of the A40.

8. Green infrastructure

- 8.1. There is no differentiation between green infrastructure and a net bio-diversity gain of 25%. The Green Infrastructure should be set aside from the beginning, not phased, and integrated into Eynsham's 'Green Wheel' for the benefit of all residents.
- 8.2. The plan assumes a SCGV community trust will be set up to manage the green spaces for Salt Cross. The Council wish to put on record that it wishes to be considered for this management role as well as taking responsibility for the West Eynsham green spaces. This would allow for the collective management of all green and blue infrastructure around the Eynsham/SCGV conurbation and allow the EPC vision of a 'Green Wheel' of connected space for biodiversity and quiet enjoyment around the village, connecting to River Thames and Green Belt land to the East and the wider countryside to the North, South and West.

- 8.3. If the green infrastructure of SCGV is to be integrated and connected, it needs to take into account the spatial mapping of the Nature Recovery Strategy for Oxfordshire which cover part of the site. The AK Urbanism phasing report has a straight algebraic calculation of green infrastructure delivery pro rata through the proposed phases. The report acknowledges that actual delivery will be lumpier. We would strongly suggest that where possible, as much green and blue infrastructure should be laid out across the whole site as early as possible in SCGV to give new habitats the longest time to establish and mature, to give new residents moving to the community, space to escape the development disruption happening around them. This would provide quiet areas for nature and recreation/community space for residents which can easily be set aside from the structural development areas.
- 8.4. The Parish Council is greatly concerned about the lack of burial space in the Parish and would wish the identification of burial ground space in SCGV be given urgent priority in the first stage of the phasing.

9. Biodiversity Net Gain

- 9.1. Given that meeting enhanced 25% biodiversity net gain targets is a goal for the Garden Village, it is disappointing that the phasing report is silent on interim net gain targets. The Parish Council is concerned that without interim milestones on biodiversity net gain, there will be a temptation by developers to deliver the majority in the later phases of the development without safeguards that new habitats and mitigation measures will be sufficiently established and delaying the overall benefit to the environment and helping to address the climate and ecological emergency.

10. Transport and movement

- 10.1. The Parish Council does not understand why community buses are phased so late in the build out. Given that some homes will only have 0.75 parking spaces and that Oxfordshire County Council's Local Transport Connectivity Plan 5¹ advises the number of car journeys need to be reduced by 2030, community bus transport should be provided from the outset so the overall aims in this respect, are in alignment. To summarise, completion of cycle routes, public transport and provision of a community bus service² should be completed in phase 1.
- 10.2. Regrettably, there is no assessment or provision for land to be safeguarded for a future rail link from Witney-Oxford within these plans.
- 10.3. There is also no assessment or provision for improvements to Swinford Toll bridge which is contrary to policy ENP14a of Eynsham's Neighbourhood Plan.

¹ [Oxfordshire County Council's LTCP5](#) is currently open to consultation.

² [First and Last Mile](#) community bus service could be supported and expanded on to provide services for the Garden Village.

- 10.4. As described above, the Parish Council strongly argue that public and active transport infrastructure should be prioritised in earlier build stages, especially community bus routes. If not then, the proposed redraft to **Policy 14 Active and Healthy Travel** to allow 0.75 to up to 2 car parking spaces per property depending on size, becomes non-viable as residents moving to SCGV in earlier build stages would be more dependent on private vehicle use.
- 10.5. The Parish Council notes that if development of SCGV site begins in the east of the site, there will be a great pressure on Lower Road. The Council believes that a 40mph speed limit should be imposed on the road and traffic signalling adopted at the Lower Road and A4095 interchange.
- 10.6. There is little joined-up planning between the Phasing Report and the HIF2 A40 Smart Corridor work. Safe connectivity between the existing Eynsham community and Salt Cross across the A40 is paramount to avoid unnecessary short local private car journeys and to allow school children from the two communities to access the new primary and secondary school sites.
- 10.7. The Parish Council has already commented that an underpass at the western end of the site is unnecessary, inappropriate and in the wrong place. As well as an early commitment to traffic-light controlled crossing points across the A40 at an early stage the Parish Council would like WODC and the Developers to commit to exploring an innovative 'green bridge' to join the local communities and provide increased biodiversity connectivity as part of the Parish Council 'Green Wheel' vision.

11. Water

- 11.1. The phasing report abrogates its responsibility to set targets to resolving waste water provision capacity. This is particularly important given that Thames Water have acknowledged that they will need to build additional strategic pumping stations for which they have yet to submit planning applications. Resolving such matters should be a phase one priority so that sufficient infrastructure is in place as any new houses are built and to offer safeguards in case of delay to building new infrastructure. There is no detail about the capabilities and phasing of sewerage improvements. Existing sewerage is already inadequate in Eynsham and locally. We would not wish river water quality standards to deteriorate further given the cumulative impact of 1000 additional homes at West Eynsham and 2200 homes at the Garden Villag on current infrastructure.

12. Waste

- 12.1. The Council believe that the Phasing Report could be more robust in the timing and commitment to community recycling facilities available in SCGV including reference to community composting initiatives.

Yours sincerely

Mrs Katherine Doughty
Clerk to the Council