



# EYNSHAM PARISH COUNCIL

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Planning Policy Team  
West Oxfordshire District Council

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22 October 2020

Dear Sir/Madam

## Salt Cross Garden Village – Draft Area Action Plan (AAP) Consultation Response

**Is the AAP is legally compliant?** No. See non-compliance with the National Planning Policy Framework (NPPF 2019) and Eynsham Neighbourhood Plan comments.

**Is it sound?** No. The AAP is considered contrary to NPPF, that the plan does not take into account the reasonable alternatives and is not based on proportionate evidence:-

It is unknown on what grounds West Oxfordshire District Council (WODC) decided to submit an Expression of Interest for (North Eynsham) garden village status to Government before Oxfordshire Growth Board (OGB) had concluded its Spatial Options Assessment. However, it is felt that North Eynsham has been inappropriately included in the West Oxfordshire Local Plan 2031 when referring to the [Independent Examiner's Report](#) and to the OGB's [Spatial Options Assessment](#) as follows:-

- Assumptions - The report is based on no less than 10 assumptions (of the 26 criteria elements) rather than being based on facts/data of the site being appropriate for development. One of the main assumptions is that planning permission for the Park & Ride/A40 improvements will be approved and Government funding will be provided. Oxfordshire County Council was issued with a Regulation 25 notice on 15 August 2019 and no developments moving the application on, is yet to be evidenced – over 4 years after the report was produced.

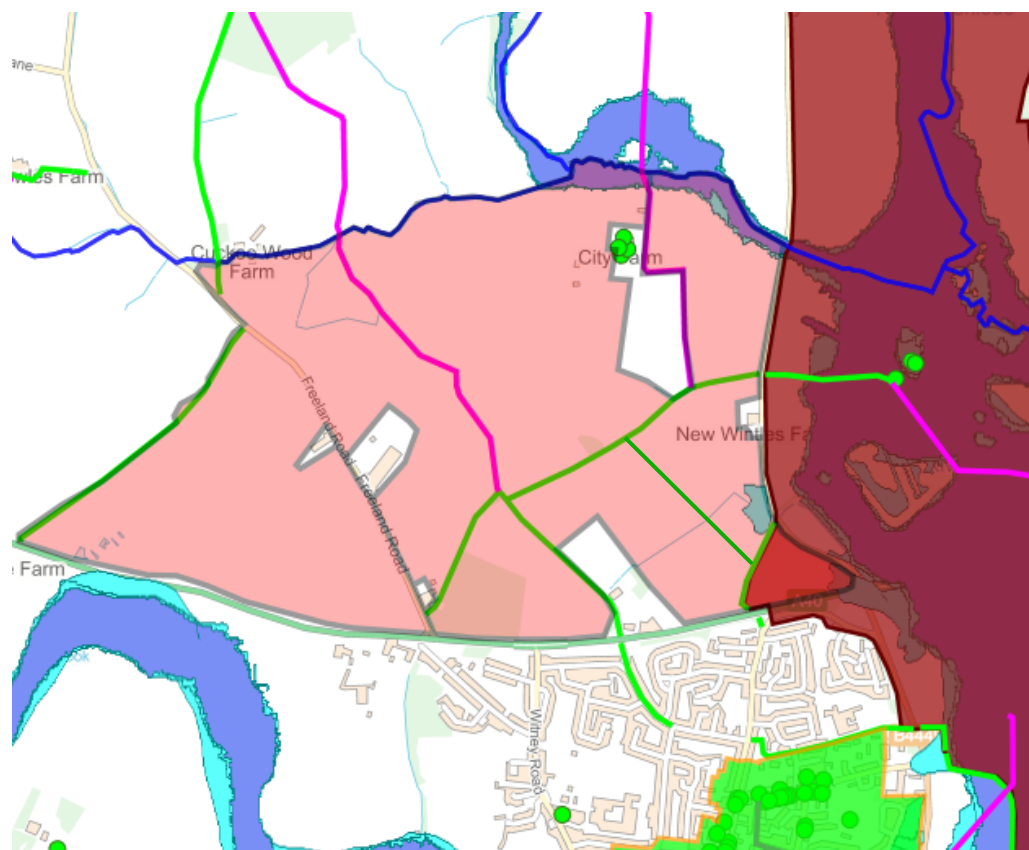
Errors/Omissions/Inaccuracies:-

- Item 17, it incorrectly states that the site does not include areas of flood zone 3. While the areas are small, they are nonetheless present and should have been considered.
- Item 20, no mention is made of the European Important Arable Plant Area at City Farm which is sufficiently significant to be addressed in the AAP. The site has nationally important arable wildflowers and various protected wildlife species are recorded in the area.
- Insufficient value has been given to views. While stating there are 'important views into the village...', insufficient weight has been provided in its 'medium' score.

- Cultural and historical associations, it is stated there are no Listed Buildings at the site which is incorrect. There are 4.
- Throughout the document no mention is made of Eynsham's valuable Public Right of Ways or the potential impact of the development to the community. Eynsham has such little public green space available to residents and this aspect should have been given consideration.
- Part of the site is within the Oxford Greenbelt.

While these issues may seem inconsequential when considered independently, the cumulative effect will have significant adverse impacts on Eynsham and the wider area. Preparation of the plan did not include relevant and up to date evidence which should have been adequate and proportionate in justifying the proposal. It is therefore considered contrary to NPPF 2019 s31 and s35 (b).

**Has West Oxfordshire District Council complied with its duty to co-operate?** Unable to comment



(Figure 1 – Map of Eynsham showing parish boundary (thin blue line), PRoWs (pink and green lines), Garden Village area (pink), Flood Zones (turquoise and blue), Listed Buildings (green spots), Eynsham Conservation area (bright green) and Oxford Greenbelt & Environmentally Sensitive Area (dark red)).

Eynsham Parish Council wish to make the following observations regarding the policies:-

## Climate action

### 1. Policy 1 – Climate Resilience and Adaptation

- 1.1. It is noted that the climate change issues and aspirations are broad and will form a 'golden thread'<sup>1</sup> through all decision making in respect of Salt Cross. Eynsham Parish Council will monitor the 'golden thread' very closely to ensure that planning applications' affordability is not prioritised and climate change policies are not compromised. We support this policy.

### 2. Policy 2 – Net-Zero Carbon Development

- 2.1. We fully support this policy as a minimum.

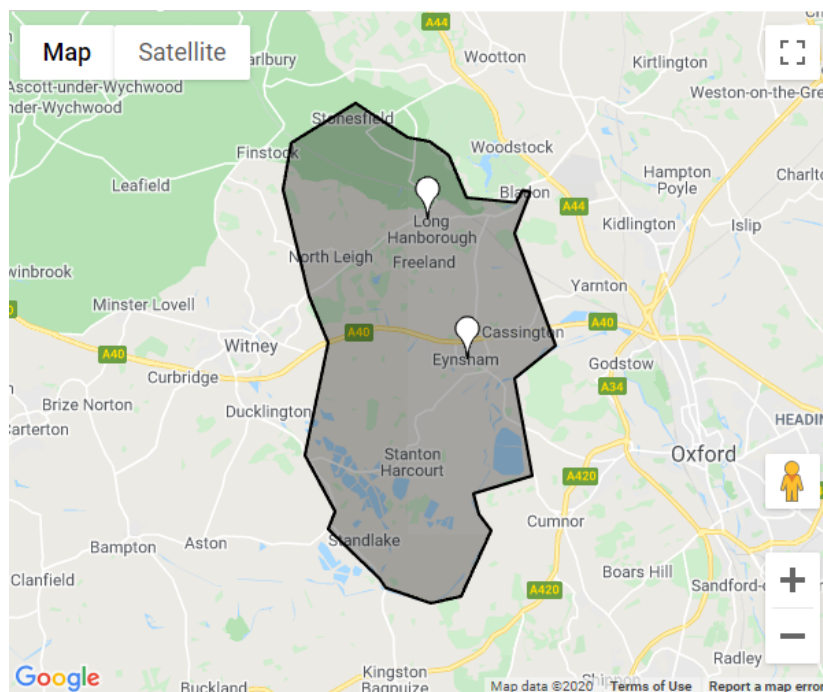
### 3. Policy 3 – Towards 'Zero-Waste' Through the Circular Economy

- 3.1. We fully support this policy as a minimum.

## Healthy Place Shaping

### 4. Policy 4 – Adopting Healthy Place Shaping Principles

- 4.1. At Policy 4 (a), the term 'local' is used. This should be replaced with 'Eynsham practice area health and wellbeing needs...' The Eynsham practice area is shown in Figure 2.

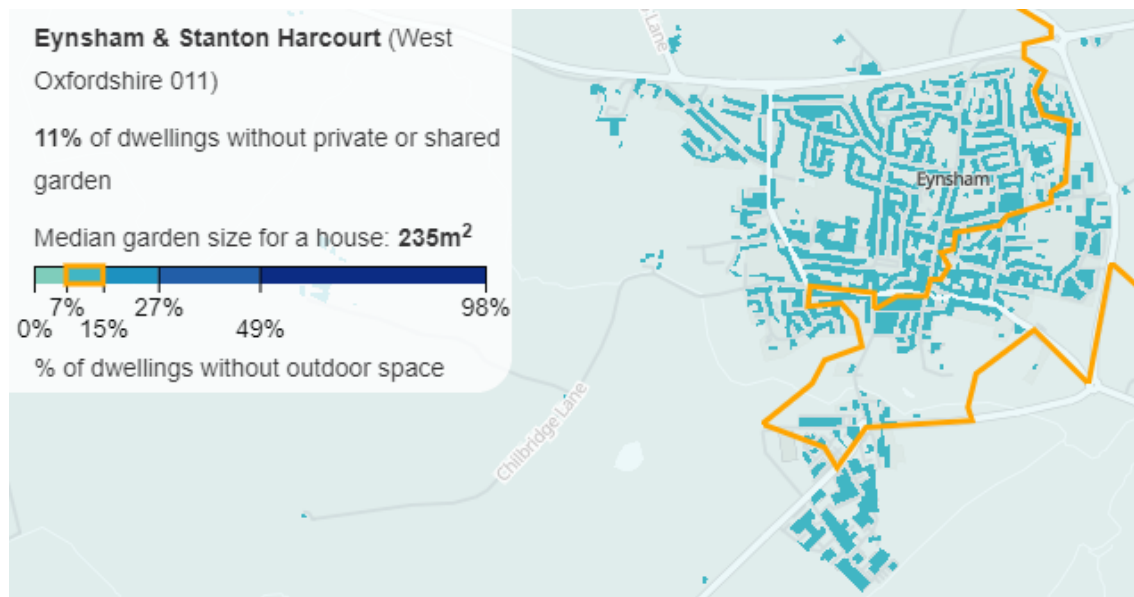


(Figure 2 – [Eynsham Medical Group \(undated\)](#). Eynsham Practice Boundary map)

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<sup>1</sup> Page 35 – para 5.13 refers.

- 4.2. A 'Comprehensive' Health Impact Assessment (HIA) should be undertaken in accordance with ENP 3(a) Health Care Facilities, as opposed to a 'Rapid' HIA. This should include stakeholder involvement and an appropriate level of research to ensure new and existing residents have the right level of healthcare.
- 4.3. The proposed gardens in the garden village should be of an appropriate size to promote healthy place shaping principles. We would like to see green infrastructure connected with surrounding areas including existing Eynsham village and proposed West Eynsham SDA, to create wildlife corridors rather than isolated pockets of nature. One example is the proposed linear park in West Eynsham linking with green space in Salt Cross.
- 4.4. Likewise, we would also like to see health-promoting infrastructure closely integrated with existing Eynsham village. This means physically such as footpaths, cycle routes, a jogging track if possible, and also making community services which promote health in Salt Cross available to residents of Eynsham and vice versa.



(Figure 3 - [Office for National Statistics \(2020\)](#). *One in eight British households has no garden.*)

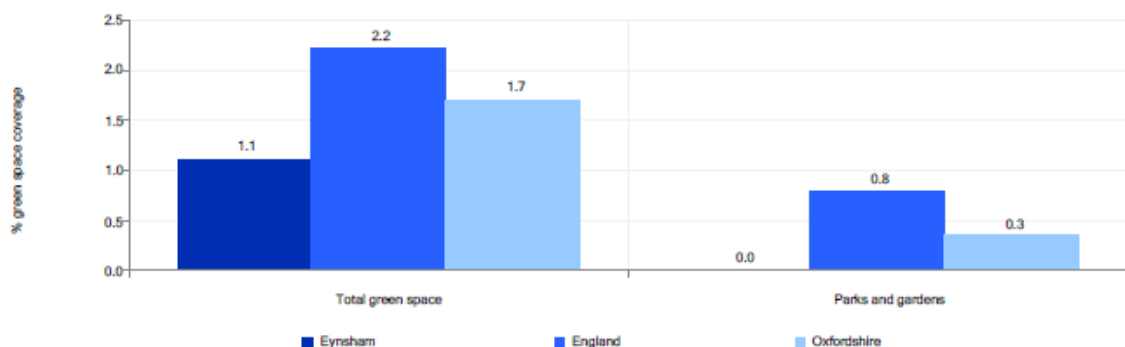
5. Policy 5 - Social Integration, Interaction and Inclusion
  - 5.1. Housing developments should include through-routes for pedestrians through all housing streets. In the past, villages would always have been designed this way but in modern developments the sealed cul-de-sac is more prevalent. The regular passing of pedestrians allows a community to better develop as people get to know each other.
6. Policy 6 - Providing opportunities for healthy active play, leisure and lifestyles
  - 6.1. This policy refers to the opportunity for a burial ground and later in the document the potential for a burial ground is referred to (Policies 27, 28). However, only paragraph 11.42 states a burial ground will be provided. This provision should be confirmed and reiterated throughout the AAP as it is imperative that a burial ground is provided.

## 7. Policy 7 - Green Infrastructure

- 7.1. While a comprehensive approach to the provision, maintenance and long term management of green and blue infrastructure is welcome, it remains of serious concern that Eynsham residents will lose their easy access to green areas and local countryside. As shown below, Eynsham has a total of 1.1% green space available compared to an average of 2.2% in England.<sup>2</sup> The views and beauty of the existing footpath network are at risk of being diminished if substantial development is directly alongside them (contrary to garden village principles of improving the natural environment).
- 7.2. As identified in the Eynsham Green Infrastructure Study, open spaces (including the footpaths) are at risk of additional pressures and further limiting the opportunities for outdoor recreation.

Total green space	Public parks and gardens greenspace
1.1%	0.00%
16.2 hectares (Oxfordshire average = 1.7%)	0.0 hectares (Oxfordshire average = 0.3%)
Source: OS data © Crown copyright and database right 2017	

Figure: Percentage of green space coverage  
Source: OS data © Crown copyright and database right 2017



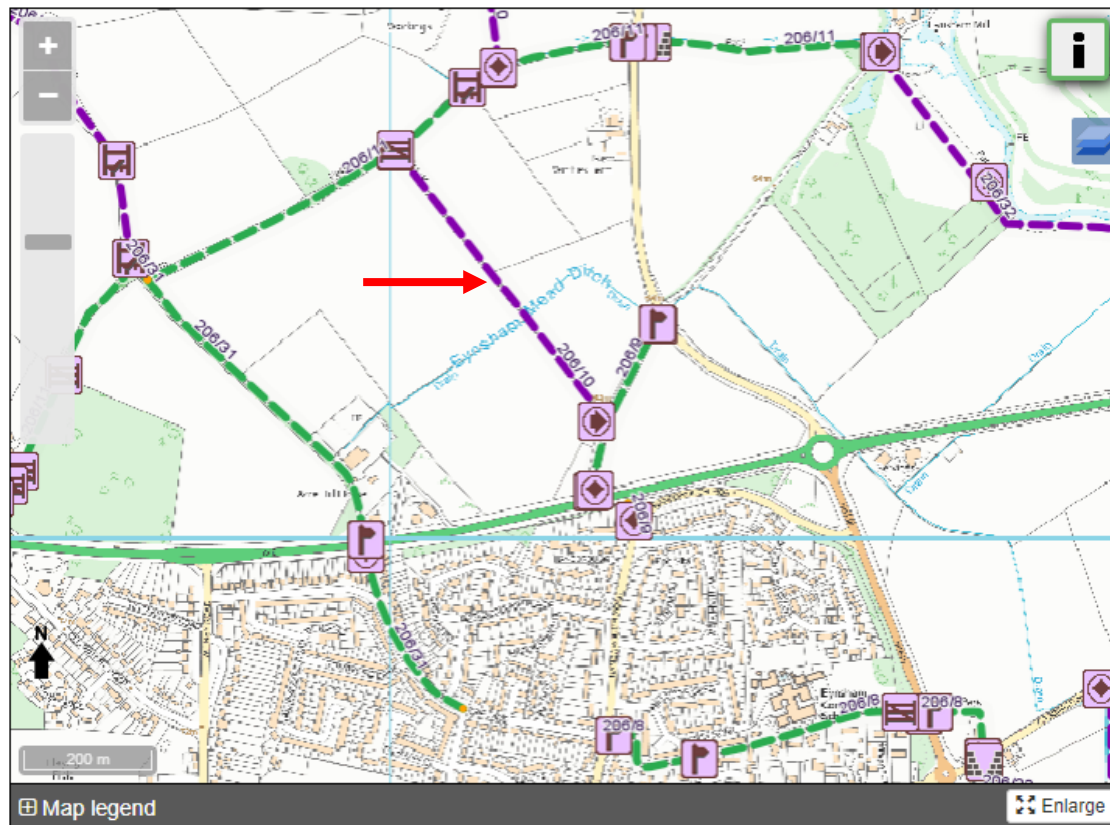
(Figure 4 – [OCSI \(2020\)](#). *Local Insight Profile for Eynsham: Communities and environment - Green space coverage* pg. 65)

- 7.3. The principle of a discrete garden village<sup>3</sup> is not being adhered to: the houses are too close to the existing A40 and will be seen as part of Eynsham. (See also 27.1). The existing countryside footpaths should form a protected green corridor. Development should be at a distance, and/or adjacent heights lowered. The damage to the existing rights of way are profound and even after the construction period they will not be pleasant to walk. More work needs to be done in this respect.
- 7.4. It should be noted that Footpath 206/10 has been omitted from the AAP and supporting documents (see Figure 5 - red arrow). This links bridlepaths 9 and 11 with each other. The footpath was subject to a Modification Order made to the Definitive Map and Statement confirmed on 28 January 2020. This omission will negatively impact on Figure 11.6 (Salt Cross – Illustrative Spatial Framework Plan).

<sup>2</sup> OCSI (2020) refers. <http://www.oxford.gov.uk/districtdata/download/downloads/id/1663/eynsham.pdf>

<sup>3</sup> Town & Country Planning Association (2018) *Understanding Garden Villages: An Introductory Guide*. <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=3507c991-fde2-4218-8920-641416f521b5>





(Figure 5 – [Oxfordshire County Council \(undated\)](#). Eynsham Public Right of Ways)

## 8. Policy 8 - Enabling healthy local food choices

- 8.1. We welcome ideas for growing food not only in allotments, but a community farm and orchard, living lanes and edible streets. Provision will need to be made for the appropriate level of support to ensure these amenities are maintained and managed to maximise food production.

## Protecting and Enhancing Environmental Assets

## 9. Policy 9 - Biodiversity Net Gain

- 9.1. It is noted that a 25% biodiversity net gain is positive when compared to the Environmental Bill's 'relevant percentage' of 10%.<sup>4</sup> However, it should be understood that there will be major destruction of these habitats and networks which are impossible to compensate by off-site offsetting and we therefore object to this aspect of the policy. The part of Salt Cross to the east of Cuckoo Lane coincides with a large area of Thames Valley Environmental Record's proposed Nature Recovery Network for Oxfordshire. The garden village is also being built over an area of the Wychwood Project, whose purpose is to "conserve and restore the rich mosaic of landscapes and wildlife habitats" of the Royal Forest of Wychwood.
- 9.2. There may be opportunities for Eynsham to benefit from 25% off-set biodiversity gain. This could be achieved with some off-setting in the Parish, especially considering the local Nature Recovery Network community project and local expertise.

<sup>4</sup> <https://publications.parliament.uk/pa/bills/cbill/58-01/0009/Enviro%20Compare.pdf>

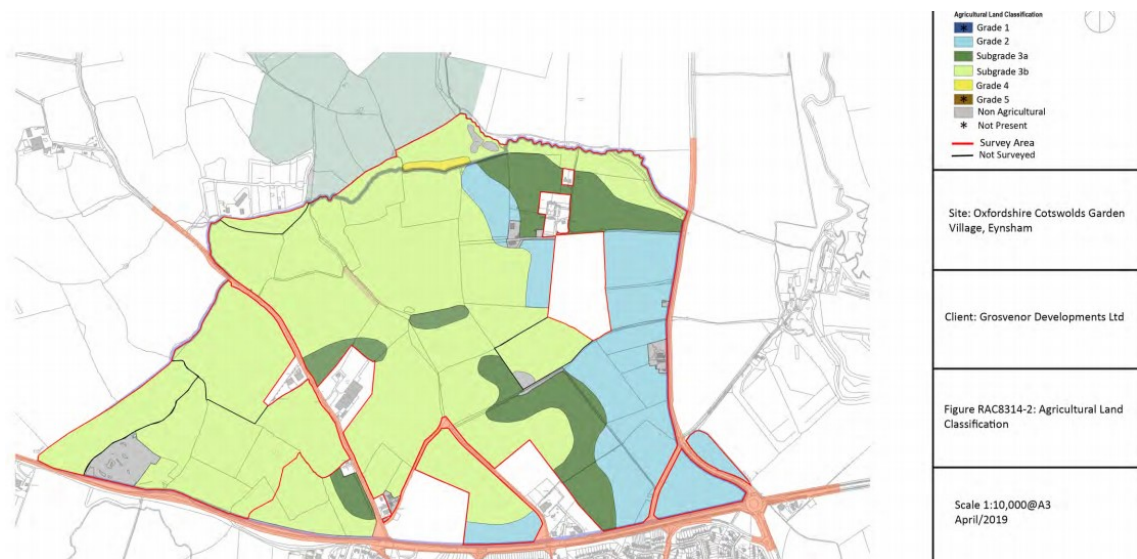
9.3. At 7.33, we note that only the (European) Important Arable Plant Areas located around the outside of the garden village will be retained due to recreational pressures, which we find unacceptable. All of the fields should be retained.

10. Policy 10 - Water environment

10.1. The Council support this policy.

11. Policy 11 - Environmental assets

11.1. Whilst the majority of the site might be Agricultural Subgrade 3b (moderate quality), when considered in an overall view with its adjoining grade 2 and 3a, the site is still valuable for its soil quality. Building over any of the best and most versatile agricultural land should not be acceptable at all and it is therefore considered contrary to NPPF 2019 policies.



(Figure 6 - [Grosvenor Developments Ltd \(2020\)](#) – Agricultural Land Classification, pg. 56)

12. Policy 12 - Conserving and enhancing the historic environment of Salt Cross

12.1. There is no specific mention of the Tilgarsley site in the policy. Preservation and enhancement of the Tilgarsley site should be specified.

## Movement and Connectivity

13. Policy 13 - Movement and Connectivity Key Design Principles

13.1. Given that Salt Cross is in a semi-rural location and that public transport is focussed on Oxford, residents will continue to rely on private car use until other forms of transport are made more attractive. Furthermore, until more attractive forms of transport are available, the appropriate amount of residential parking will be considered too high given the 'green principles' attributed to a garden village status.

## 14. Policy 14 - Active and Healthy Travel

14.1. While high quality design standards are being aimed for the Garden Village, this does not appear to extend to the proposed access points between the existing community and the Garden Village or the highway area inbetween. Policy 14 should provide for either 2 pedestrian/cycle bridges across the A40 of exemplar design (ie a 'green bridge') or a pedestrian/cycle bridge crossing as well as an underpass or should be included; light-controlled crossings will only increase traffic frustrations.

### 14.2. North Way/Sunderland Avenue



(Figure 7 – [Google \(2020\)](#). North Way/Sunderland Avenue)

Eynsham Parish Council request the section inbetween the garden village and the existing community, to replicate [Northway/Sunderland Avenue, Oxford](#). A 30mph limit between the ends of the built-up areas would make the links more acceptable and the road less obtrusive. With a boulevard-feel of green space, shared users with traffic at a low speed, the feeling will be more of driving through a community space as opposed to simply a commuter highway. The green infrastructure will help with air quality and noise pollution once established. Policy 14 as proposed has no vision, placemaking concepts or principles for this important area between the two communities. High quality, well designed green infrastructure with a long term, viable maintenance plans have not been included in Policy 14. It therefore fails to comply with Eynsham Neighbourhood Plan's policies ENP2, ENP4 and ENP14a and the NPPF.

## 15. Policy 15 - Public Transport

15.1. The Park and Ride is a total irrelevance to Salt Cross and should be located elsewhere. The provision of good public transport for the village is essential, but it is not to be expected that villagers would drive to the park and ride site to access it.



15.2. Policy 15 should include guaranteed frequent, direct public transport links with Headington to meet the needs of hospital workers and patients. Parking at the hospitals is extremely restricted, but public transport arrangements need to be 'door to door' if the requirement for car travel is to be avoided – particularly for patients. This arrangement is often seen by private operators as not commercially viable, however that objection must be overcome if the car is to be taken out of the equation.

16. Policy 16 - Reducing the Overall Need to Travel including by Car

16.1. Insufficient detail is provided on the planned extent of Electric Vehicle charging infrastructure.

17. Policy 17 - Road Connectivity and Access

17.1. Eynsham Parish Council is concerned with the 'gamble' that Oxfordshire County Council will gain appropriate planning permission and corresponding Government funding to enable the garden village development to be acceptable in planning terms. Furthermore, if Government funding is provided for the A40 corridor infrastructure schemes, it should not be reimbursed by way of S106 monies from the Garden Village development. S106 funding will be required to making the proposal acceptable in planning terms, not only for infrastructure requirements relating to roads, but to the many other areas that will require funds. Reimbursing the Government for the highway scheme (which needed resolving 30 years ago) will leave a substantially reduced level of S106 funds available for other important requirements.

17.2. The most vociferous objections to the garden village have focused around the problems of the A40: building another large housing development on the already overcrowded road (not forgetting more development feeding into the A40 from the west) requires much more radical attention than has been given so far and also reinforces the need for stronger and more imaginative policies to minimise car use and parking in the garden village itself. Building two new roundabouts will make delays worse, and the proposed A40 dualling between Witney and Eynsham will not resolve the problems.

17.3. No detail has been included relating to the assessment of any impact on Toll Bridge traffic. It is therefore considered contrary to ENP14a.

**Enterprise, Innovation and Productivity**

18. Policy 18 - Salt Cross Science and Technology Park

18.1. The Science and Technology Park creates contradictions. Is Salt Cross to meet Oxford's unmet need? If so, a large commercial area is unnecessary. If the garden village principle of creating work close to home is more valid, then Salt Cross is in the wrong place and should be further into West Oxfordshire to provide work and homes further from Oxford and break the A40 travel requirement.

18.2. There are already unused spaces on the Business Park in Eynsham and the current proposals are for a huge amount of additional land to go under concrete with very little evidence for its need. The combination of Brexit, the shrinking economy and the changing life and work patterns during and subsequent to Covid 19 means that the existing plans are totally out of date: this may turn out to be an expensive “add-on” which significantly increases the size of the garden village (and consequently the decimation of the land) without offering any benefit to the local community.

18.3. The objective of locating any Science and Technology Park in a site with strong, sustainable transport links is welcomed, although in practice the appalling congestion on the A40 is already a disadvantage for local businesses and may be a deterrent for new businesses unless the infrastructure is improved significantly.

18.4. Nevertheless we support businesses which can provide local employment, with the added benefit of discouraging mid to long distance commuting (and consequent air pollution and congestion problems) and helping bring the community together.

19. Policy 19 - Small-scale commercial opportunities and flexible business space

19.1. The policy should include confirmation that no large retail outlets will be permitted which could threaten viability of Eynsham's existing shops.

20. Policy 20 – Homeworking

20.1. The requirement to plan for co-working workspaces should be strengthened. Home working has huge advantages in terms of avoiding travel, but has the disadvantages that all homes are not suitable and generally workers benefit from the company of others. Local, flexible, home working ‘pods’ can achieve the same advantages whilst removing the disadvantages.

21. Policy 21 - Employment, skills and training

21.1. The Council support this policy.

**Meeting Current and Future Housing Needs**

22. Policy 22 - Housing Delivery

22.1. The AAP does not cap the number of homes to be built - this should be capped at a maximum of 2200 with no flexibility for developers to take advantage and increase in future years or to expand the built area. The policy should include the word ‘maximum’ and remove any wording within the supporting text that could have alternative meaning.

22.2. Given that a purpose of the Garden Village is to meet Oxford’s unmet need, the dire need for Oxford’s keyworkers should be catered for in the affordable housing allocation. This is particularly relevant to NHS workers where housing costs are having a huge negative impact on recruitment. This housing need should also be supplemented by guaranteed direct public transport links with Headington. Policy 22 should specifically include reference to NHS key workers.

23. Policy 23 - Housing Mix

23.1. Whilst understanding the economics of the development the PC wishes to see at least 50% affordable housing as modelled in the IDP.

24. Policy 24 - Build to Rent

24.1. A small Build to Rent scheme of 50 units is supported, and then to assess how successful, as part of the affordable housing mix to help local young professionals and families.

25. Policy 25 - Custom and Self-Build Housing

25.1. The Council support this policy.

26. Policy 26 - Meeting Specialist Housing Needs

26.1. Specialist housing accommodation is supported with the particular needs of older persons and people with disabilities taken into consideration in line with ENP1A.

**Building a strong, vibrant and sustainable community**

27. Policy 27 - Key development principles

27.1. It is clear in a number of ways, the Garden Village principles (see Figure 8) are not being followed. This has been a constant theme throughout meetings since the start and whilst we may have made some progress there is a long way to go.

27.2. It is unclear how housing is designed to promote community cohesion.

27.3. The location of the schooling provision still appears to be wrong and is likely to encourage traffic movement. The schools need to have enough parking spaces so that they don't spill outside as at present.

27.4. Policy 27 should reference the requirement for through routes for pedestrians through all housing streets. In the past, villages would always have been designed this way but in modern developments the sealed cul-de-sac is more prevalent. The regular passing of pedestrians allows a community to better develop as people get to know each other.

## The Garden City principles

A Garden City is a holistically planned new settlement that enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. The Garden City principles are an indivisible and interlocking framework for delivery, and include:

- Land value capture for the benefit of the community.
- Strong vision, leadership and community engagement.
- Community ownership of land and long-term stewardship of assets.
- Mixed-tenure homes and housing types that are genuinely affordable.
- A wide range of local jobs in the Garden City within easy commuting distance of homes.
- 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.
- Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.



(Figure 8 – [Town & Country Planning Association \(undated\)](#) – *The Garden City Principles*)

### 28. Policy 28 - Land uses and layout – the spatial framework

- 28.1. 'Around 2,200 homes' should be amended to read 'a maximum of 2,200 homes' in view of the already allocated housing for Eynsham. As per other planning application response.
- 28.2. Whilst the plan is illustrative, we have concerns about access to burial ground as this proposal does not appear to accord with WODC plans.
- 28.3. The attenuation and burial ground should not be included in the 40% open spaces.
- 28.4. Play areas appear generous until you compare them to existing provisions in Eynsham.
- 28.5. Would like the views of our Allotments Group about proposed plot sizes and facilities.
- 28.6. Would like view of Playing Field managers about proposed sports provision. Rugby appears to be getting a poor deal and no cricket provision.

### 29. Policy 29 - Design requirements

- 29.1. There is little mention of architectural style in the site wide design code, but page 120 shows an extremely dense concrete paved mews. This is surely not in keeping with a "garden village" scheme.



29.2. Salt Cross needs to focus on different kinds of housing to meet different kinds of need. It must comply with the recommendations of the ENP (which, despite excellent detail, is not explicit in the AAP/ OPA). The ENP clearly identifies a range of housing in terms of tenure, design and purpose based on extensive consultation with the local community. **Neither the AAP nor the planning application give adequate recognition to the work done in the creation of the ENP which involved significant consultation with local people.** Reassurance should be given concerning the enforcement mechanisms to hold the builders to these requirements, rather than allowing them to build standard estate housing on the grounds of financial viability. The evidence of Oxford's unmet housing need is out of date and totally unspecific, and the reality of it should be questioned, as the growth targets for Oxford have been reduced, presumably meaning that fewer houses are in fact needed.

29.3. The maximum height of buildings should be 3 storey. According to Figure 9 Parameter Plan 4: Building Heights, it is proposed to build up to 16m high at the highest point of the Garden Village site. Based on a storey height of c. 4.3m, the proposal will be beyond 3 storey which the Parish Council consider unacceptable; even more so at this particular location. It is impossible to understand how the proposed marker building will emphasise the importance of the landscape on the site – it just appears an opportunity to build a large building.



Figure 9 – [Grosvenor Developments Ltd \(2020\)](#). *Parameter Plan 4: Building Heights*

### 30. Policy 30 - Provision of supporting infrastructure

30.1. EPC wish to ensure that the Garden Village is ideally complementary to the existing settlement and at the very worst case, has no negative impact on services and facilities currently provided in Eynsham. The infrastructure should be additive and not reduce the services and facilities that already exist in Eynsham. This was explicit in the Eynsham Neighbourhood Plan (page 9):-

“ENV8 A New Settlement:

ENV1-7 shall be shared by the new settlement, which shall be built according to Garden Village principles as a new, separate, community. Settlements should be largely independent but with any shared facilities for their mutual benefit and without causing harm to either.”

On this basis we welcome the commitment in the IDP that “the infrastructure here is also intended to benefit existing communities wherever possible and ensure that the development of the new community provides a positive contribution to the quality of life in Eynsham and the surrounding area as a whole.”

We also expected to see the adopted components of policy ENP14a included in the AAP and planning application. These are:-

In addition, development in Strategic Development Areas and the proposed “Garden Village” should:

- A. Be brought forward in a comprehensive and coordinated manner, in the case of the Garden Village, through the Area Action Plan and in respect of the Strategic Development Area, through another appropriate mechanism such as a Supplementary Planning Document including a masterplan agreed with WODC and in consultation with the Parish Council. Requirements for supporting infrastructure and services shall be established through the masterplan and, where necessary, through legally binding agreements.
- B. Include an assessment of the impacts of the new development on residents of Eynsham Village, particularly the impact on local services and facilities such as education and healthcare.
- C. Include a mechanism to ensure the timely provision of adequate community facilities.
- D. Where appropriate, make provision for new employment opportunities as part of the overall mix of development.
- E. Make provision to mitigate infrastructure constraints including the main access roads (A40, B4449, B4044), where necessary.
- F. Include an appropriate assessment of any impact on A40 and Toll Bridge traffic.
- G. In respect of the garden village, ensure that development is taken forward in accordance with garden village principles (as set out by DCLG).
- H. Have regard to the need to provide extensive and high-quality green infrastructure to include opportunities for walking, cycling and riding.

Despite the volume of documents submitted we are not persuaded that all these have been met and do not feel that B has been considered at all.

More detailed discussion on the IDP follows:

### Burial Grounds

The Council welcomes the identification of a site within the Garden Village. The location close to Eynsham is welcomed though the proximity to water and the ground conditions need further consideration. If the identified site is not practicable then a site as accessible to Eynsham as possible should be identified.

Whilst it is the case that limited funds have been reserved to provide a burial ground within Parish Council budgets, it should not be assumed that these are available due to existing and ongoing pressures within the PC budget not the least of which is responding to garden village and other consultations. S106 monies must be provided to provide the burial ground infrastructure.

#### Culture and the arts

385m<sup>2</sup> seems insufficient. It is disappointing that no attempt has been made to develop a themed package of public art within the garden village. This is a key part of place making and should be included.

#### Community meeting space

The PC welcomes the allocation of 1056 m squared of flexible community facilities. We would again argue that the precise use of these facilities should be strategically assessed across both the garden village and Eynsham to ensure complementarity.

We would support a local police presence in these facilities covering both Eynsham and the garden village.

#### Community Development Facilities

The proposed infrastructure needs seem sensible. It should be noted that local police resources already stretched after recent cuts.

#### Library and archives

Eynsham has a highly valued library facility and it would therefore make sense again to think of a satellite facility in the Garden Village located within the Community Hub. Again, a coordinated strategic approach would make sense. 190m<sup>2</sup> feels insufficient.

#### Indoor sport/leisure

This is an area where a combined strategy covering Salt Cross and Eynsham would make sense. The PC plans to rebuild the Pavilion in Eynsham and would want this to be available to the wider community. We note that Eynsham has 50% of the average green spaces in England mitigated by the proximity of the countryside. With developments to the West and North and potential minerals extraction to the East, this will not hold going forward. The PC would want to see the maximum possible space committed to Green Spaces in the Garden Village to help mitigate the low level of green space in the existing Village.

The facilities at Bartholomew School and the MUGA have capacity and could be linked to new facilities with the Garden Village. A single strategy would make sense. There should, however, be some allowance made with in the garden village for indoor sports.

## Education

### Early years

There should be a firm and binding commitment that the Garden Village will be at least self-sustainable by meeting OCC recommended levels of provision (currently a place for every 2.3 children). The IDP proposes this capacity be integrated within the Primary Schools site(s) which we support. A Child Care Centre for young families would be an excellent way of helping bind together the new community as well as providing support and advice. It could fit well within a new community centre.

### Primary Education

The IDP assumes that there is sufficient capacity within the existing nearby (2) primary schools which we support. Whilst this may be true there is an absolute priority to upgrade and improve the facilities/buildings within Eynsham. This could be achieved by the construction of a new primary school within the West Eynsham Development – it would be more complex to re-provide on the existing site though this has the benefit of a more central location. This should be a priority for S106 or CIL resources.

Policy EW1 of the local plan proposed 2 primary schools of two form entry (FE) within the Garden Village. The illustrative masterplan only shows one. This appears to be a 3FE primary – we are concerned whether this will be sufficient.

8 hectares are identified for educational use – as this is based on OCC policies, we assume this will be sufficient (but note the one versus two primary school issue discussed above).

### Secondary Education

There is an absolute need identified to increase the numbers of places available. The PC had understood this was to be achieved by the addition of a sixth form annexe in the Garden Village and is pleased to see this facility identified within the illustrative masterplan.

## Emergency services

Clearly with increased population, resources will need to be increased. This does not appear to be reflected in the IDP. Eynsham Fire Station will need inward investment to meet the increased demand as will provision for local community policing.

## Green infrastructure

The PC welcome the inclusion of 3 Neighbourhood Equipped Areas for Play and four Local Equipped Areas for Play and supports the allocation of two sporting hubs. However, we would like to ensure that these support existing and proposed facilities in Eynsham and would argue for an overall strategic approach to be adopted. It would seem unnecessary, for example, to have two cricket clubs.



We are pleased to note that in all areas plans exceed projected needs. However, this is particularly the case with amenity green space and natural and semi natural green space (largely due to the limitations of the site) and we would have expected more generous allocations of space being made to play areas, parks, allotments and gardens and outdoor sports.

It appears that of the space that is developable, priority has been given to business and housing rather than recreation and relaxation. This appears at odds to the applicant's rhetoric in public and other meetings.

#### Health and social care

Whilst the data appears to show capacity at Eynsham Medical Centre experience of waiting times and access targets suggests the contrary. It is critical that access at a central location within Eynsham is maintained and enhanced. The population of the area is an ageing one and demands are likely to increase. The PC would welcome a second satellite surgery within the Garden Village complementary to the existing buildings in Eynsham and the planned new Surgery in Long Hanborough. If possible, an increased range of local services should be planned across the three sites minimising the need for travel outside the practice catchment area. This should include diagnostic services as well as an enhanced range of treatment options.

Whilst welcoming the allocation of 1,100 Sq. metres of space, we are most concerned about the suggestion that the current practice might totally re-locate to the garden village. If this were the case, then the allocated space is barely enough and this would preclude the development of additional services which would benefit both communities.

#### Extra Care Housing

The PC would welcome more clarity with respect to extra care housing which is at a premium in the existing village. ENP Policy 1 includes a description of how the GV is to look and includes mention of extra care housing at B:

"Larger residential developments should include a mix of housing types and tenures to make balanced communities. The ideal community will include a wide range of ages, incomes, education and skills so that the community could be largely self-sustaining. This shall be achieved by:

- A. Implementing WOLP Policy H4 with a presumption towards Eynsham's existing housing balance favouring smaller homes for market, affordable and social housing, including starter homes, homes for downsizing typically in the 2 / 3 bed categories and addressing the local need for housing adapted for older residents and those with special needs.
- B. Providing affordable housing in accordance with WOLP Policy H3, addressing local need including provision for essential local workers.

- C. New residential development designed, where possible to enable residents to walk to key village facilities to maintain the compact, inclusive community nature of the village. Where this is not achievable, proposals should include appropriate mitigation which will ensure integration with the existing village.”

### Transport

The PC is extremely concerned about the inadequate A40 crossing facilities in the IDP. There are simply not enough safe crossings included. We also have concerns about the number and location of roundabouts on the A40 and would expect a coordinated plan to be produced taking account of both the garden village and the proposed western development. Ideally there should have been one AAP which would have simplified matters greatly. Joined up planning for transport infrastructure including OCCs ill thought through plans for the A40 must be a critical next step.

In discussion with the applicant the PC has consistently made it clear that at least three crossing points are required including either a bridge or a subway at Old Witney Road and the same at the Eynsham Roundabout. The Commitment to fund one graded crossing is welcomed but far from adequate.

We had also been led to understand that the plans would include a cycleway from Botley all the way to Long Hanborough station. We are unclear if this is fully included in the IDP.

We welcome the commitment to electric vehicles, but question the merits of a centralised charging hub as opposed to a more distributed solution.

### Energy, Water & Waste

We are disappointed in the commitment to only meet 25% of residential energy requirements from renewable sources on site and only 20% site wide. This is inadequate.

We do support an all-electric strategy for the site. Given the fragility of the existing Thames Water network we are greatly concerned about the assumptions made in the IDP and would suggest that this requires further work.

### Infrastructure Delivery Options

#### Management, maintenance and stewardship

The PC would welcome the opportunity for ongoing dialogue with the applicant and WODC in this area. We consider that the PC has considerable expertise in the public realm which could be beneficially brought to bear.

## Phasing

Eynsham Parish Council would wish to see this structured in line with the adopted ENP and WODC Local Plan. We are concerned that the timing of the build out of key infrastructure is such that the burden on existing facilities in Eynsham is minimised. In addition, we would expect to see a local step between the development of employment opportunities and housing builds on the garden village to minimise traffic movements and create the self-sustainable development we expect.

It does not appear that the current planned phasing will meet these requirements and so we would urge that these be reconsidered.

### 31. Policy 31 - Long-term maintenance and stewardship

31.1. We support the policy and the formation of a Community Land Trust.

### 32. National Planning Policy Framework 2019

32.1. The AAP is considered contrary to the following policies:-

32.1.1. Conserving and enhancing the natural environment policies 170 (a), (b), (d) and 171.

32.1.2. Strategic Policy 20 (d)

### 33. Eynsham Neighbourhood Plan

33.1. The AAP does not comply with the following policies:-

33.1.1. ENP1 Housing

33.1.2. ENP2 Design

33.1.3. ENP3 Community Facilities Including Infrastructure and Utilities.

33.1.4. ENP3 (a) Health Care Facilities

33.1.5. ENP3 (b) Infrastructure and Utilities

33.1.6. ENP3 (c) Education

33.1.7. ENP4 Green Infrastructure – The Setting for New Developments.

33.1.8. ENP4 (a) Enhancing Biodiversity

33.1.9. ENP5 Sustainability: Climate Change

33.1.10. ENP7 Sustainable Transport

33.1.11. ENP8 Connected Place – Integration of New Developments with the Village

33.1.12. ENP9 Parking 26

33.1.13. ENP10 Building a Strong Sustainable Economy

33.1.14. ENP11 Retail

33.1.15. ENP12 Local Green Spaces

33.1.16. ENP13 Trees

33.1.17. ENP14 Sustainable Growth

33.1.18. ENP14 (a) Strategic Development Area and “Garden Village”

## 34. Conclusion

- 34.1. The AAP sets some high expectations and standards, but there appears to be insufficient attention given to ensuring these standards are enforced and adhered to. Repeated references to "viability" are not reassuring; likewise, the extensive use of "reserved matters". With existing examples of poor internal standards in Hazeldene, traffic chaos in the building of Thornbury Green and an estate completely devoid of trees, and now a totally dysfunctional approach to West Eynsham, there seems little point in trusting that housebuilders will be held to account.
- 34.2. We therefore request West Oxfordshire District Council to follow their AAP document and liaise with Councillors as much as possible.
- 34.3. The Garden Village, if built, should be constructed as a post-Covid, 21st Century, full-on and carbon-neutral development; a symbol of hope and a model for very difficult times to come. A huge amount of passionate and knowledgeable community involvement has been evident from Eynsham since the garden village was first proposed: it should result in a model of development here.

## 35. The Council requests to be notified of:-

- 35.1. The submission of the AAP for independent examination;
- 35.2. The dates when consultees may make representations to the Inspector;
- 35.3. The publication of the recommendations of the Inspector;
- 35.4. Proposed alterations to the AAP by WODC; and
- 35.5. The adoption of the AAP.

Yours faithfully



Mrs Katherine Doughty  
Clerk to the Council