

Pre-Submission Draft Salt Cross Garden Village Area Action Plan

Consultation Representations Received



This document sets out responses submitted to the consultation on the Pre-Submission Draft Area Action Plan which was undertaken in August 2020.

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Personal details including postal address, signatures and email addresses of individual respondents have been removed.

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Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
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23 October 2020

Our Ref: 20/5683M

Dear Sir/Madam,

Salt Cross Garden Village Area Action Plan: Pre-submission draft – August 2020
Representation on behalf of Aldi Stores Limited

This letter is submitted in response to West Oxfordshire District Council's Salt Cross Garden Village Area Action Plan (AAP): Pre-submission draft (August 2020), and is made on behalf of Aldi Stores Limited (Aldi).

The vision as set out in the draft AAP is for Salt Cross Garden Village to become established as a thriving and inclusive community by 2031. The AAP envisages that those who live there will enjoy a healthy, high quality of life with new homes, a new country park, and walkable village neighbourhoods supported by a range of facilities including local shopping opportunities.

This letter is submitted to inform the Council of the Aldi's interest in developing a modest sized discount foodstore as an 'anchor' store to the Salt Cross Garden Village development. This is also an opportunity to kickstart a dialogue between Aldi, the Council and Grosvenor Developments Ltd to develop and expand the draft AAP and outline proposals to provide an Aldi foodstore within the Garden Village.

The Town and Country Planning Association (TCPA) have identified the key principles of Garden City developments, which include the need for '*Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods*' and '*a wide range of local jobs in the Garden City within easy commuting distance of homes*'.

As set out within the AAP, a key role of the AAP is to establish, in broad terms, the type of different land uses that are expected to come forward at Salt Cross and how they will be distributed and laid out across the site. However, in terms of the amount and mix of different uses at Salt Cross, the AAP is not definitive or prescriptive at this stage and does not provide an amount of land or floorspace expected to come forward for commercial uses.

01/01

Development at Salt Cross is expected to include a range of small-scale commercial uses falling within the A1-A5 use classes (and now E use class) including, for example shops, cafes, professional services, and public houses. These are expected to be located within the main village centre and within individual neighbourhood centres as part of a mix of different uses.

Moving forward following Covid-19 and in line with the Government's approach, it is important that the Salt Cross Garden Village AAP builds in flexibility to allow for the ever-changing demands of the economy, technology, retailers, and customers.

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple | Alastair Close
Dan Templeton
Associate Directors
Katie Turvey | Heather Vickers | Alan Williams

Consultant
Lorna Byrne
Associates
Sally Arnold | Rob Scadding | Penny Moss | Sam Deegan | Paul Galgey
Niall Hanrahan | Phil Marsden | Charlotte Perry | Charlotte Hunter

This is to ensure that policies and standards support investment and economic development, as well as reflecting the needs of the local population and characteristics of the local area. This is particularly the case given the current situation with the COVID-19 pandemic, and the Government's approach to boosting the economy.

Aldi considers there is a need for a discount foodstore store within the proposed Garden Village to provide a retail facility to serve proposed housing within the Garden Village and the existing residents in the local area.

Aldi is interested in developing a modest sized discount foodstore as an 'anchor' store to the Salt Cross Garden Village development in a location that is near to the A40, and considers that it would be appropriate for the AAP to identify this use/site at an early stage of the process.

Salt Cross Garden Village represents an excellent opportunity to deliver a multi-million-pound investment and provide beneficial economic development through the development of an Aldi discount foodstore within the Garden Village. An Aldi foodstore within the Garden Village would provide for the day to day needs of the existing and projected local population, improve the range of accessible facilities and choice available to shoppers, including those on lower incomes, and reduce the need to travel further afield to carry out their food shopping, keeping spending local.

Aldi's customers generally use other shops and stores, as well as Aldi, in order to fulfil their grocery shopping and local service needs. Aldi is, therefore, complementary to the proposed Local Centres and shops within the Garden Village, and also complementary to the existing pattern of trade both in existing town centre shopping areas and larger out of centre stores within the area. Aldi stores provide a limited product range of goods compared with most supermarkets. Aldi complement, rather than compete with, existing local traders, independent retailers and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs.

An Aldi store would therefore be particularly suitable to act as an 'anchor' facility for a new village centre, and the scale and form of development will complement the establishment of other uses.

01/01 cont.

An Aldi store is an employment generating use and will increase social inclusion through the provision of local job opportunities and high-quality, low priced goods. An Aldi store will support the local economy and help to balance economic growth in the area in line with the Local Plan and NPPF aims for economic growth, providing a timely boost to the local economy.

In line with policies in the AAP and Local Plan, the nature of many of Aldi's stores encourages good levels of pedestrian access and users of public transport. Cycle stands are also provided close to the store entrance for natural surveillance, and usually under cover to encourage cycling as a mode of transport. Electric Vehicle Charging Points are also provided.

Aldi is committed to working with the Council to ensure that a high quality and beneficial scheme can be delivered for the Garden Village site that is already identified for development that includes retail uses. Aldi's track record of delivering developments within a streamlined timescale, means that the proposal has potential to complement other developments in the area in the short term, giving confidence to other developers.

Aldi is aware of the submission of an Outline Planning Application (ref. 20/01734/OUT) for a mixed-use Garden Village, which has been recently submitted to the Council for consideration, and put forward this representation as an opportunity to engage in dialogue between Aldi, the Council and Grosvenor Developments Ltd to evolve and develop the draft AAP and outline proposals to provide an Aldi foodstore within the Garden Village.

The Council should seek to put forward proposals that will enhance the foodstore provision in the area. The draft APP should be re-considered to allow for a new foodstore development within the proposals to improve the retail offer and consumer choice in the area, keep spending local and reduce the need to travel further afield, provide local employment opportunities, and deliver beneficial economic development.

I should be grateful if this submission is given due consideration through the progression of the West Oxfordshire District Council's Salt Cross Garden Village Area Action Plan (AAP): Pre-submission draft (August 2020). In the meantime, please would you confirm receipt of this submission and include my email address in any future correspondence.

Yours faithfully,



Lloyd Collins

Planner

Planning Potential

Bristol

Enc.

Salt Cross Garden Village - Area Action Plan Consultation

Response from:

Richard Andrews



I am an Eynsham resident and was responsible for compiling the Eynsham Neighbourhood Plan (ENP) documents as an Eynsham Parish Council (EPC) member. I am no longer a member of EPC and am commenting in my own capacity as a local resident.

I consider that the draft AAP is compliant with the three statutory tests of a Local Planning document. There may be a few paragraphs where one or other criterion may be called into question by those with specific interests and I am sure that local residents will wonder how the plan can be considered 'sound' in relation to the A40 and its existing traffic problems which can only be exacerbated by the addition of 2200 new homes.

However, I suspect that WODC have done almost all they are able to do to minimise impact given that they are not the Highway Authority and, while *they* have a duty to co-operate, it does not appear that OCC (the Highway Authority) are required to co-operate with them in terms of location of roundabouts and other highway features which might further improve matters.

It is however clear that WODC have put a lot of effort into ensuring that the plan is ecologically sound and legally compliant with the requirement for carbon-neutrality which flows from the UK's signing of the Paris Climate Treaty and was recently enshrined in UK law.

02/01

In particular I consider it important to uphold WODC's carefully argued and costed case for carbon-neutrality both in construction and subsequent operation of the Garden Village which I'm sure will be attacked by those whose only concern is for lowest possible cost (so they can maximise profit as the final price of houses will be set by the market, not building costs) and may pretend that the minor cost increases will affect 'viability'. Eynsham residents expressed their strong desire all through the ENP consultation processes to ensure that the Garden Village was built to the highest possible standards as expressed in Section ENP5 of the Neighbourhood Plan and WODC have clearly endeavoured to achieve the same ends in this draft AAP.

WODC have also included most of the elements from the Neighbourhood Plan (as indeed they are legally obliged to do by the Neighbourhood Planning process) so it is particularly important to ensure that continuing legal compliance and soundness of the draft AAP are not compromised by any attempt to water down the many features set out in the AAP to ensure that the Garden Village will be an excellent built environment with appropriate facilities for residents and links to the local countryside.

In particular the draft AAP strongly reflects the ENP as regards to

- importance of a compact, easily walkable community.
- excellent provision for education, medical and social provision.
- good links with Eynsham while retaining its independence.
- good provision of recreational facilities

02/01 cont.

It is important to note that many draft AAP requirements reflect those in the adopted ENP and removing these from the draft AAP would compromise the legal compliance of the final AAP by

ignoring the adopted neighbourhood plan.

It's true that removing any of the innovative design features and skimping on the elements that will create long-term environmentally sustainable homes could reduce the costs by a small amount but that will not affect 'affordability' in any way as the price will be set solely by the market and any 'savings' will go into someone's profit not into any benefit for the community or the new residents individually.

I very much hope that this plan will be accepted so that a real attempt can be made at making a Garden Village worthy of the title.

Representation received by: Norman Ashworth

Dated: 23 October 2020

AAP Section: Reducing the overall need to travel, particularly by car

"The whole issue has very little consideration given for the daily congestion caused by HGVs toiling to get up the two inclines running up to the Eynsham traffic lights Provision of two further roundabouts along this section will likely create gridlock on most working days - which is not in the nations best interests post Brexit on what is fast becoming a major arterial route cross Country. The Ministry of Transport should be advised of this flawed transportation plan otherwise you will be likely creating an environmental disaster area." - 23 Oct 2020 23:48 (Reducing the overall need to travel, particularly by car).

03/01

Representation received by: Aston, Cote, Shifford and Chimney Parish Council

Dated: 8 October 2020

AAP Section: Transport

Question:2 First Name	Question:3 Last Name	Question:9 To which part of the area action plan does this representation relate?	Question:9 To which part of the area action plan does this representation relate? Comment	Question:10 Do you consider the AAP to be legally compliant?	Question:11 Do you consider the AAP to be sound?	Question:12 Do you believe the AAP complies with the duty to co-operate?	Question:13 Please give details of why you consider the Area Action Plan is not legally compliant or is...	Question:14 Please set out what modification(s) you consider necessary to make the Area Action Plan legally...	Question:15 If your representation is seeking a modification, do you consider it necessary to participate...
Elaine	Anstee	Policy	Transport			Yes			No, I do not wish to participate at the oral examination.

04/01

From: Linda Barlow [REDACTED]
Sent: 17 October 2020 08:48
To: Planning Policy (WODC)
Subject: Garden Village

Dear Planning department,
Your proposals for the Garden Village in terms of energy efficient homes, the protection of the environment, are all laudable. The features of a Garden Village as originally outlined are marvellous principles for the future.

I would emphasise that for wellbeing most people who have houses prefer to have a garden. This space is important for inner and outer health. I would like this to be a key part of the design. I feel it should be *both/and* not *either/or* - communal green space and individual gardens. They are an important part of the English psyche.

05/01

This is one of the principles of a Garden Village from the original background:

- Beautifully and imaginatively designed homes **with gardens**, combining the best of town and country to create healthy communities, and including opportunities to grow food

Best wishes,
Linda Barlow
Eynsham

Respondent ID 06 - Goldfield Estates and Pandora Properties
Comment ref: 06/01 - 06/14

Planning Policy Team,
West Oxfordshire District Council,
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BY EMAIL: planning@westoxon.gov.uk

19th October, 2020

Dear Sir/Madam,

**SALT CROSS GARDEN VILLAGE AREA ACTION PLAN PRE-SUBMISSION DRAFT
CONSULTATION: REPRESENTATIONS SUBMITTED ON BEHALF OF GOLDFIELD ESTATES
LTD AND PANDORA PROPERTY LTD (JANSONS PROPERTY)**

On behalf of our clients Goldfield Estates Ltd and Pandora Properties Ltd (Jansons Property), we are pleased to submit the following representations in response to West Oxfordshire District Council's (WODC's) consultation on the pre-submission draft Salt Cross Garden Village Area Action Plan (AAP).

As background and context, Jansons Property control land at Derrymerrye Farm and the Long Barn on Old Witney Road, Eynsham. The land is located to the south of the Garden Village site and, in the majority, forms part of the West Eynsham Strategic Development Area (SDA) allocated for development within Policy EW2 of the West Oxfordshire Local Plan (September 2018).

06/01

The Garden Village forms an important part of the Local Plan and, together with the SDA, will make a substantial contribution towards providing for the housing, and infrastructure, needs of West Oxfordshire as well as Oxford City. To this end, we support WODC in preparing the AAP which is intended to guide the future delivery of the Garden Village and this strategic location for growth.

These representations follow on from the representations submitted on behalf of Jansons in response to previous AAP consultations in July 2018 and October 2019, and given the proximity of the West Eynsham SDA focus specifically on the need for a comprehensive approach to the growth of Eynsham and the inter-relationship between the Garden Village, the SDA and the existing village.

Relationship to the West Eynsham Strategic Development Area

In our view, it is imperative that emerging proposals for the Garden Village, SDA and Park & Ride are considered comprehensively to support the development of sustainable communities and make best use of planned infrastructure.



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While Eynsham (incorporating the SDA) and the Garden Village are intended to function as two separate settlements they are co-joined by the A40. Both will need access to the bus services provided from the Park & Ride into Oxford and beyond to mitigate in part their traffic impact on the A40.

Both the Garden Village and Eynsham (incorporating the SDA) are furthermore likely to be required to share services and facilities until the Garden Village becomes established as a sustainable new settlement. The provision of safe and sustainable links across the A40 will therefore be important in facilitating the integration of the two settlements.

Taking this into account, connectivity and the coordinated delivery of infrastructure will be crucial. We comment below on sections of the AAP which we consider are of relevance to this.

Part 1 - Introduction

In the context of the Garden Village and SDA being inextricably linked, we support the inclusion of reference to the SDA throughout the draft AAP. However, we note that no reference is made to the emerging West Eynsham Supplementary Planning Document, intended to guide development in the SDA, within the submission draft AAP. We would suggest that, given the interrelationship between the sites, cross reference is made and due regard is had to the content of the emerging SPD.

06/02

In addition, we recommend that specific reference to the SDA is made within Section 3 of the AAP. This section of the AAP is intended to address the 'characteristics of the Salt Cross site and the surrounding area' (paragraph 3.1); however, it fails to identify two important considerations, namely the SDA and the proposed Park & Ride site which is located within, and integral to, the planning policy context for the Garden Village and the boundary for the strategic location for growth.. As we return to below, these are an important omission given the interrelationship of the Garden Village, SDA and Park & Ride. As a minimum they should therefore be identified in the list of key considerations for future development provided at paragraph 3.20.

06/03

We note that the relationship with and impact on Eynsham, including the SDA, is identified as a key consideration in Appendix 4 of the AAP., We support the references in Appendix 4 to the need to co-ordinate development of the Garden Village and the SDA, and desire to see the two areas planned and delivered in an integrated manner. We also agree with the identified opportunities to have a coordinated approach to infrastructure provision, timing of delivery and to develop complementary yet independent masterplans for the Garden Village and SDA. Given these important considerations we therefore question why reference to the SDA in the fourth bullet point of paragraph 3.20 has been omitted. Given the importance of the relationship between the Garden Village and SDA, we request that these points are detailed within the main body of the AAP as further text to Part 1. We also request additional reference is made to the Park & Ride proposals which is not only an integral part of Local Plan Policy EW1 but also forms a vital role in mitigating the traffic impacts of development at Eynsham.

Part 2 - Vision and Core Themes

We broadly support the Vision and Core Themes identified within the draft AAP and consider that they are appropriate for guiding the development of the Garden Village.

06/04

We consider that it is important that the relationship of the Garden Village with the existing village of Eynsham and its planned expansion via the West Eynsham SDA is considered in relation to each of the identified Core Themes.

For example, as we address below, movement and connectivity will be key to the successful integration of the Garden Village, SDA and existing village and should therefore be considered comprehensively across the area.

Part 3 - The Strategy

Policy 7 - Green Infrastructure

We support the ambition for a landscape-led Green Infrastructure strategy as part of the Garden Village development which Policy 7 states should utilise and create a network of connected, multi-functional green spaces and corridors, provide routes to and between key destinations and the surrounding countryside and support opportunities for health and wellbeing benefits as well as environmental protection and enhancements.

06/05

In particular, we support the delivery of green corridors through and around the Garden Village as shown in Figure 6.3. As Figure 6.3 illustrates, there is an opportunity to connect to wider green corridors, both existing and proposed. This includes the emerging linear park proposals as part of the West Eynsham SDA. Cumulatively, the Garden Village and SDA present an opportunity for substantial Green Infrastructure provision which, particularly if considered comprehensively, could deliver significant benefits to the people of Eynsham as well as the local environment.

Policy 13 - Movement and Connectivity Key Design Principles

The importance of the movement and connectivity strategy for the Garden Village is set out in the submission draft AAP at paragraphs 8.1-8. A number of high-level principles are then detailed in Figure 8.1 which are broadly categorised into connectivity within the Garden Village, with the existing Eynsham Village and then within the wider area. We support the overarching principle that recognises that there will be significantly increased demand for people to travel safely and seamlessly between the Garden Village and the proposed West Eynsham SDA by walking, cycling and riding.

06/06

In principle, we support the objectives for the design of streets within the Garden Village identified within Policy 13. As we detail below, enabling sustainable travel, ease of movement and legibility will entail masterplanning which takes account of existing connections to Eynsham and the surrounding area as well as opportunities for new and enhanced connections, including those associated with the SDA and Park & Ride.

To strengthen the need for connectivity between the Garden Village, the Sustainable Transport Hub (Park & Ride) and the West Eynsham SDA, an additional sub Heading for Connectivity to the SDA should be included. The following should be inserted:

Connectivity with proposed West Eynsham SDA

Good walking, cycling and public transport connections must be provided between the Garden Village, the Sustainable Transport Hub (Park & Ride) and the West Eynsham SDA, with consideration being given to a direct route between the Sustainable Transport Hub (Park & Ride) and SDA, which may include an 'at-grade' crossing of the A40.

Further information in respect to the design and minimum expectations of the Movement and Connectivity Key Design Principles should be provided to ensure that the high-quality infrastructure set out in the text is actually delivered.

No reference is made to the delivery of mobility hubs which offer an opportunity to provide multi modal nodes across the AAP area and connect the site at key locations, along with other mobility hubs such as the Park and Ride, Hanborough Station, the West Eynsham SDA local centre and the village of Eynsham itself.

The significance of the Sustainable Transport Hub (incorporating the proposed park and ride) to the delivery of aspirations of the Garden Village is well documented throughout the supporting text, however there is little information to show how the Garden Village will connect to the hub for pedestrians, cyclists and public transport. If the hub is not connected by a network of spokes providing direct access between the Sustainable Transport Hub and the Garden Village, its central role of reducing car borne trips and encouraging modal shift will not be achieved.

Policy 14 - Active and Healthy Travel

The provision of safe and effective connections for pedestrians, cyclists and other non-motorised movements across the A40 at Eynsham should be one of the central objectives of all development and transport improvements in the area. Currently there is only one controlled crossing at the Witney Road traffic lights and four uncontrolled crossings of the A40. These are not considered able to provide safe and direct connections for pedestrians and cyclists given the significant volumes of traffic including Heavy Goods Vehicles (HGVs) carried by the A40 for large parts of the day.

06/07

Given the significant increase in demand for movement likely to occur as a result of the development of the Garden Village and SDA, improvements to the existing crossings are considered necessary. In this regard, we support the proposed requirement for infrastructure improvements to be provided for pedestrians and cyclists along the A40, directly as part of development and through financial contributions to OCC-led A40 works.

We note that the draft AAP identifies that a grade-separated crossing could be provided between the Garden Village and Eynsham between Old Witney Road and Cuckoo Lane with the costs of design and construction to be reasonably apportioned between the Garden Village and SDA.

It is however not absolutely clear that the location of the proposed grade separated crossing (underpass) provides the most direct route for the majority of movements between the Garden Village and Eynsham, without the need to 'funnel' people towards the underpass. Additionally, the proposed segregated underpass is not considered to be located on a desire line for future residents within the West Eynsham SDA where primary cycle and pedestrian links are intended to align with the delivery of a spine road and northern access onto the A40 via the proposed Park & Ride roundabout. In the absence of this evidence, justification and confirmation of deliverability we therefore have concerns regarding the assertion in Policy 14 that the West Eynsham SDA will need to cover a proportion of the design and construction costs of these works.

We believe further focus should be provided as to how a direct pedestrian / cycle crossing can be delivered on the desire line between the SDA and the Garden Village and the Sustainable Transport Hub (Park and Ride). This important requirement has been recently reinforced in light of the recent WYG report which has identified that the primary northern access into the West Eynsham SDA should be via a 4th arm from the Sustainable Transport Hub (Park and Ride).

We therefore consider, further work will be necessary to establish the appropriate location and design of the crossing, taking account of the A40 improvement works currently being designed by OCC. This work should seek to identify the most appropriate and cost effective location for a crossing which can serve the Garden Village, the SDA and existing village, particularly as it will provide access for all residents to key facilities such as secondary education.

In line with paragraph 56 of the NPPF, it will be necessary to demonstrate that any planning obligations sought are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. This will be particularly important where the cost of infrastructure provision is to be apportioned between multiple development which it is intended to serve.

No comment is made in respect to the ability of the AAP area to accommodate future modes of transport such as e-scooters which have the ability to increase distances people are willing to travel in the future without the need for a private car. We recommend that this is addressed within the AAP.

Policy 15 - Public Transport

Policy 15 requires that development provides financial contributions towards the A40 improvement schemes and repayment of HIF. As noted above, justification for any planning obligations sought will need to be provided in accordance with paragraph 56 of the NPPF.

In the examination of the Local Plan, the potential requirement for the strategic allocations located along the A40 corridor to repay any Local Growth Fund or HIF funding was not identified in the West Oxfordshire Infrastructure Delivery Plan (IDP) (2016) or indeed in the emerging Eynsham Area IDP prepared by AK Urbanism. Whilst we accept the provision of HIF funding may not have been secured during the preparation of these documents and of course welcome the forward funding of the A40 corridor improvements, Policy 15 does not provide any further information on the likely apportionment of cost/per dwelling contribution for each development site. This is particularly relevant given the acknowledgement in para. 8.57 that the A40 improvement works will bring increased opportunity for use of sustainable modes of from those travelling from a much wider area. This will be an important component of any S106 contribution and therefore in the absence of this understanding we are concerned about the potential impact this may have on scheme viability.

06/08

It should be ensured that any land to be safeguarded along the southern boundary of the Garden Village to support widening of the A40 to accommodate the bus lanes and pedestrian and cycle facilities should be sufficient to deliver pedestrian and cycle routes commensurate with latest guidance.

Any contributions sought towards the development of Hanborough station as a transport hub (as part of the wider infrastructure and service upgrade proposed for the North Cotswold Line) will require justification in accordance with paragraph 56 of the NPPF.

Policy 17 - Road Connectivity and Access

We broadly support the proposed vehicular site accesses, subject to technical work demonstrating that safe accesses with appropriate capacity can be delivered in these locations.

Of particular relevance to the funding of highway infrastructure, it is important to note that analysis of access options for the SDA undertaken by WYG has concluded that the West Eynsham SDA should be served to the north by a fourth arm on the proposed Park & Ride roundabout. As such, the western roundabout proposed to serve the Garden Village will benefit the Garden Village only, and therefore need to be funded in its entirety by the Garden Village development.

06/09

Section 106 contributions should be commensurate to the scale of development and it should be recognised that while the forward funding provided through the Growth Fund and Housing Infrastructure Fund will benefit both the Garden Village and the West Eynsham SDA it also benefits those travelling from a much wider area.

Measures for discouraging driving to the Park & Ride from Salt Cross Garden Village should include the delivery of multiple points of access for non-car modes to the Park and Ride from all directions surrounding the sustainable transport hub.

We agree that any laybys impacted by the proposed access arrangement should be mitigated/relocated, as Policy 17 proposes. The development of the Garden Village and SDA is, cumulatively, anticipated to impact upon two existing freight laybys, located to the north and south of the A40. Therefore, there is a need for a coordinated approach to the re-provision of the existing freight layby function. From discussion with officers, we understand that alternative locations for the laybys is yet to be identified but is being reviewed as part of the comprehensive consideration of the HIF2 funding which is intended to support the dualling of the A40 between Witney and Eynsham. We recommend that all options which could support alternative locations for the delivery of improved freight layby facilities along this stretch of the A40, including within the Garden Village and the sustainable transport hub (Park and Ride) are appraised in detail. This should also include the potential to provide one higher-quality layby capable of meeting the demand from the existing two laybys. New laybys should be designed alongside the A40 improvement schemes currently proposed to ensure that a holistic approach to transport infrastructure is employed.

We raise concern to the reference within Policy 17 to the A40 bus lanes needing to be complete prior to first occupation of development at the Garden Village (unless development is car-free). The delivery of the bus lanes is within the control of the County Council and the imposition of such a requirement could have serious implications for housing delivery at Eynsham if the delivery of the bus lanes is further delayed, thereby potentially preventing sufficient housing being delivered so as to meet identified needs. We do not wish to see development of the SDA restricted. Fundamentally, this requirement is unnecessary in light of the inclusion of text within Policy 17 which states that planning permission will only be granted where the Council is satisfied that the impact on the local and strategic road network would be acceptable and does not compromise the delivery and benefits of the A40 Corridor improvements.

Policy 27 - Key Development Principles

The description in Table 11.1 adjacent to 'Sustainable Transport hub' should be expanded to include cycle / scooter hire schemes, delivery lockers, car club and potential opportunity for short term 'layby style' parking.

Figure 11.6 - Additional arrows should be included on the plan to identify the northern access into the SDA as well as an additional arrow signifying an additional crossing of the A40 in the vicinity of the sustainable transport hub (Park and Ride) access. Additional points of access for active travel modes into the sustainable transport hub (Park and Ride) should also be shown.

06/10

Paragraph 11.45 makes reference to the potential for a new bridge in the western part of the site possibly in the form of a 'green bridge' which would help to further connect Salt Cross with future development at West Eynsham, subject to funding. It is considered that rather than locate two grade separated crossings either side of one of the most likely desire lines, i.e. directly across the Park and Ride roundabout, further consideration should be given to a crossing of the A40 in the vicinity of the Park and Ride roundabout to align with the primary all modes access into the SDA

Policy 28 - Land Uses and Layout - The Spatial Framework

We support WODC in identifying key land use assumptions for the Garden Village as part of the AAP and broadly agree with the land uses identified.

We note that the quantum of primary education provision to be provided within the Garden Village is to be considered in conjunction with future provision as part of SDA. We consider that this is, in principle, a sensible approach to ensuring appropriate capacity is provided. As we return to below, the phasing of additional school capacity should be considered on a comprehensive and cumulative basis to ensure the availability of school places does not inhibit development in Eynsham.

06/11

In respect of the layout of the Garden Village, we have sought to engage proactively with WODC and Grosvenor regarding the locations of key uses and site accesses. This engagement has included the submission of written representations in response to earlier consultations on the AAP, the sharing of emerging evidence base documents prepared to support the SDA and participation in design charettes organised by Grosvenor.

We broadly agree with the illustrative spatial framework plan provided within the AAP and welcome the identification of key elements to be reflected through more detailed masterplanning. In particular, we support the identification of effective and safe pedestrian and cycle connections across the A40 as key element of the Garden Village development. Convenient and usable connections between the Garden Village, SDA and existing village will be essential to the sustainability of development and should therefore be considered throughout the masterplanning process.

Policy 30 - Provision of Supporting Infrastructure

We support WODC in seeking the timely provision of infrastructure to encourage effective place making, social interaction and integration, minimise disruption to residents and to ensure that existing services and facilities are not put under unreasonable strain.

As we have previously commented, there is a need for the Garden Village and SDA to be considered comprehensively, particularly in respect of the timing of development, the supporting infrastructure requirements and the physical connections between the two sites and surrounding area. It is critical that the AAP, emerging Eynsham Area IDP and West Eynsham SPD are aligned in their preparation and consistent in their approach to the delivery of supporting infrastructure if WODC's aspirations are to be achieved.

06/12

Infrastructure planning must therefore be informed by a comprehensive view of development coming forward in Eynsham, particularly given that a number of infrastructure requirements identified in Appendix 5 of the draft AAP will be shared by the Garden Village and SDA. For example, the timing of new primary education provision should be considered comprehensively, taking account of the capacity of existing schools and where additional capacity can be most appropriately provided as the population of Eynsham increases. As such, further work to ascertain whether additional growth can be accommodated in the short term by existing schools, and consequently the appropriate phasing of new provision, will be necessary to ensure that no development is prohibited from coming forward due to a lack of school capacity. We are aware from discussion with OCC Education that there is a desire to ensure that the delivery of new schools occurs in accordance with demand for school places, thereby ensuring that schools are viable and not operating significantly under-capacity. This will be an important factor to consider when planning the phasing of school delivery across Eynsham.

Equally, the provision of transport infrastructure to be used by the Garden Village and SDA will need to be considered comprehensively, as discussed in detail above. To this end, access from the A40, for vehicles, pedestrians and cyclists should be considered comprehensively and located suitably to ensure accessibility for the existing village, Garden Village and SDA, with appropriate contributions towards delivery sought from each development. The Garden Village planning application does not include any allowance for crossing points over the A40 within the application boundary. As such, it will be OCC's responsibility to ensure that crossings are on the correct desire lines and will be delivered in a timely manner, taking account of the need for residents to access amenities and facilities provided within the existing village especially during the early phases of development.

To support the comprehensive planning and delivery of new and improved infrastructure in Eynsham and the surrounding area, we agree that the site-specific IDP for the Garden Village should be based on the identified requirements set out in the emerging Eynsham Area IDP.

Further to our comments above regarding contributions towards A40 improvements, for the IDP to be robust it is essential that justification for contributions anticipated to be shared and sought from the West Eynsham SDA is provided at an early stage.

OCC / WODC Non-Motorised Crossings of the A40 at Eynsham Report (April 2020)

The findings of the above evidence base report, underpinning the submission AAP should be reviewed in light of the findings of the recently published WYG report. This report appraises access options for the SDA and identifies that the spine road to the West Eynsham SDA should be connected to the Park and Ride roundabout rather than the proposed Garden Village 'western' roundabout. This is likely to create a stronger demand / desire line in the vicinity of the Park and Ride roundabout, which should be considered in more detail.

06/13

Garden Village AAP and West Eynsham SPD Evidence Base 2031 Forecast Year Modelling

The findings within the 2031 forecast year modelling report are acknowledged. We also note reference at the beginning of the report to the significant technological advances and changes in the social, economic and environmental conditions which influence travel behaviour and that the current AAP modelling does not take into account future changing trends or the mode shift that will take place as a result of the 'Connecting Oxford' proposals and other policy interventions, which are being delivered along the A40 corridor. Neither do they take account of the acceleration in travel behaviour and trends resulting from the current Covid 19 Pandemic, which is likely to slow the rate of background traffic growth and reduce trips associated with business purposes, throughout the day. The modelling is therefore considered to be a worst-case scenario.

06/14

Future modelling should make some allowance for this, especially as further, more detailed trip generation analysis such as that provided as part of the Garden Village application shows that total 'external' trip generation may be overestimated. Furthermore, any future modelling to support the AAP should reflect the latest position in respect to the location of the northern access to the SDA from the Park and Ride roundabout, and should also provide additional information in respect to the likely traffic movements on the SDA spine road.

We trust that the enclosed representations are duly made and look forward to receiving confirmation of receipt.

Please contact the writer by emailing charlotte.omahony@bartonwillmore.co.uk should you require any further information or have any queries.

Yours faithfully,



CHARLOTTE O'MAHONY
Associate

Respondent ID 07 - Jansons Property
Comment ref: 07/01, 07/02

Planning Policy Team,
West Oxfordshire District Council,
Elmfield,
New Yatt Road,
WITNEY.
OX28 1PB

27352/A3/EF/COM/dw

BY EMAIL: planning@westoxon.gov.uk

22nd October, 2020

Dear Sir/Madam,

**SALT CROSS GARDEN VILLAGE AREA ACTION PLAN PRE-SUBMISSION DRAFT
CONSULTATION: REPRESENTATIONS SUBMITTED ON BEHALF OF JANSONS PROPERTY**

On behalf of our client Jansons Property, we are pleased to submit the following representations in response to West Oxfordshire District Council's (WODC's) consultation on the pre-submission draft Salt Cross Garden Village Area Action Plan (AAP). These representations are submitted in respect of the existing aggregate recycling facility at New Wintles Farm which is located within the eastern part of the Garden Village site.

Context

The aggregate recycling facility does not fall within the application boundary of Grosvenor's outline mixed use planning application which is currently under consideration by WODC (20/01734/OUT). However, the submitted illustrative masterplan identifies the aggregate recycling facility as being retained with landscaping, open and recreational space proposed adjacent to the east and south. We understand from the application documents this is intended to provide a buffer to residential dwellings from noise and dust arising from the existing recycling facility.

07/01

It is recognised that New Wintles Farm has permanent planning permission for use as an aggregate recycling facility, which was approved in 2010. As an existing waste recycling facility, the use of the Site is currently safeguarded under Policy W11 within The Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (adopted in September 2017).

Policy W11 notes that proposals for development that would directly or indirectly prejudice the use of a site safeguarded for waste management will not be permitted unless the development is in accordance with a site allocation for development or equivalent waste management capacity can be appropriately provided elsewhere or lastly where it is demonstrated the Site is no longer required for waste management. The supporting text to Policy W11 further notes that 'a site may otherwise be released from safeguarding if it is established that.....***the use should be relocated in the interests of proper planning of the area.*** (Our emphasis added)



FS 29637

Registered in England
Number: 0C342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

The emerging Minerals and Waste Local Plan: Part 2 - Site Allocations Document is intended to allocate sites for minerals and waste development and to identify and define minerals and waste facilities to be safeguarded. A Preferred Options Part 2 - Site Allocations document was consulted on between January and March 2020. As part of the evidence base for Part 2 the aggregate recycling facility whilst safeguarded, has been deemed unsuitable for expansion due to the potential to compromise the future development of the Garden Village.

Area Action Plan Representations

The Garden Village forms a vital part of the Local Plan and will make a substantial contribution towards providing for the housing, and infrastructure, needs of West Oxfordshire as well as Oxford City. To this end, we support WODC in preparing the AAP which is intended to guide the future delivery of the Garden Village and this strategic location for growth.

However, in the context of the Oxfordshire Minerals and Waste Local Plan Part 1 and draft Part 2 and in the interests of the proper planning of the Garden Village, Jansons consider it is imperative for the AAP to build in necessary flexibility to consider the potential for alternative uses of land at New Wintles Farm in the future. We explore the benefits of this approach in more detail below.

07/02

We support WODC in identifying key land use assumptions for the Garden Village as part of the AAP and broadly agree with the land uses identified with Policy 28 (Land Uses and Layout - The Spatial Framework). It is notable in the opening sentence however that development proposals are expected to accord with and not compromise the delivery of key land use assumptions in the Garden Village. The presence of the existing aggregate recycling facility however appears to do just that in the Illustrative Spatial Framework at Figure 11.6 where it appears incongruously positioned between residential areas and extensively buffered by landscaping to mitigate against noise and dust disturbance.

Retaining flexibility in the AAP for the potential future redevelopment of this site for alternative land uses identified within Policy 28 could therefore provide an opportunity for a form of development which (i) is more sympathetic and amenable to future residential development alleviating issues associated with the existing use such as noise pollution, (ii) is more consistent with the wider aspirations and vision for the Garden Village as a 'place to grow, space to breath, and (iii) provides an opportunity for a more holistic masterplanning approach in the interests of proper planning of the area.

Therefore, whilst we support the objectives of the Illustrative Spatial Framework, we note that within the Illustrative Framework, Policy 28 and indeed the AAP as a whole there is no reference or flexibility to consider the potential opportunity for existing land uses with the Garden Village boundary (City Farm, New Wintles Farm etc), to be redeveloped in the future and, critically, incorporated into the place making rationale. We therefore request further consideration is given to this potential opportunity in the policy wording and indeed throughout the AAP.

We trust that the enclosed representations are duly made and look forward to receiving confirmation of receipt.

Please contact the writer by emailing charlotte.omahony@bartonwillmore.co.uk should you require any further information or have any queries.

Yours faithfully,



CHARLOTTE O'MAHONY
Associate



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

Name of the Document to which
this representation relates:

Salt Cross Garden Village AAP

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

By Post: Planning Policy,
West Oxfordshire District Council,
Elmfield,
New Yatt Road,
Witney,
Oxon.
OX28 1PB

Or by Email: planning.policy@westoxon.gov.uk

This form has two parts-

PART A – Personal Details

PART B – Your Representation(s).

Please fill in a separate sheet for each representation you wish to make

PART A

1. Personal Details

2. Agent's Details (If applicable)

Title	Mr	
First Name	Jon	
Last Name	Lambert	
Job Title	Planning Director	
Organisation	Berkeley Strategic	
Address Line 1	Berkeley House	
Line 2	19 Portsmouth Road	
Line 3	Cobham	
Line 4	Surrey	
Post Code	KT11 1JG	
Telephone Number		
Email Address		



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

PART B – Please use a separate sheet for each representation

Name or Organisation: Berkeley Strategic

3. To which part of the Area Action Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Area Action Plan is:

- | | | | | |
|--|-----|-------------------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 4. (2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the
Duty to co-operate | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Berkeley Strategic ("Berkeley") support the preparation of the Area Action Plan ("AAP") and welcome the opportunity to comment on the Pre-Submission draft of the plan. Berkeley control 82 acres of the West Eynsham SPD, representing approximately 40% of the overall allocation. We are currently working with the District Council, Oxfordshire County Council and other stakeholders to prepare a Supplementary Planning Document ("SPD") to secure the comprehensive and co-ordinated delivery of the SDA.

It is important that both the Salt Cross AAP and West Eynsham SPD each recognise the need for the co-ordinated delivery of relevant shared infrastructure across the two sites.

Berkeley supports the requirement of Policy 17 that part of the principle vehicular access to the Garden Village will comprise of the provision of a new Western Development Roundabout on the A40 located to the west of the proposed park and ride access junction. However, so as not to prejudice the delivery of the West Eynsham SDA, it is essential that the design of the Western Development Roundabout safeguards the ability for a southern fourth arm to be taken from the roundabout to provide access to the West Eynsham SDA.

Local Plan Policy EW1 and paragraph 9.5.55 set out the need for the highway access proposals for the Garden Village to be aligned with the access arrangements of the West Eynsham SDA. To be sound, the AAP needs to ensure that highway access to both sites is co-ordinated as required by the Local Plan.

08/01



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

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6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A paragraph should be added to Policy 17 to state that:

"The design of the Western Development Roundabout will safeguard and not prejudice the provision of a southern fourth arm from the roundabout to provide vehicular access to the West Eynsham SDA."

08/01
cont.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

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7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Berkeley control a major part of the West Eynsham SDA and wish to participate in the relevant hearing session(s) to ensure that proposals for access to the Garden Village do not prejudice the delivery of the West Eynsham SDA.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Date

BLADON PARISH COUNCIL

email: [REDACTED]

Mr Chris Hargraves,
Planning and Strategic Housing
West Oxfordshire District Council

Dear Sir,

10.10.2020

Ref: Salt Cross Garden Village pre-submission draft for Area Action Plan (AAP)

The Salt Cross Garden Village is an ambitious development, with many positive elements particularly those relating to meeting housing needs in a sustainable and responsible way. In the document, Policy 17 deals with road connectivity and access, however, Eynsham & Cassington and Freeland & Hanborough are the only wards mentioned as affected.

09/01

1. We ask that the Ward of Woodstock, Blenheim & Bladon be added to these two wards

Traffic on the A4095 - the only through road in Bladon and with significant pinch points, will certainly be affected by the development.

2. Bladon PC should be involved in implementation of the Construction Traffic Management Plan.

- a. During construction it is highly likely that traffic on the A4095 through Bladon will increase. There will be workmen driving to the site who may well use this route; construction vehicles may be coming this way. We request a weight limit on Lower Road as well as no right turn for lorries at the junction with the A4095, limiting where possible, the flow of heavy goods vehicles through our village.
- b. It needs to be recognised that alongside development of Salt Cross, there will also be development on the A40. It seems highly likely that there will be periods when Lower Road to the A4095 and A44 will be seen either formally, or by drivers simply trying to avoid queues, as a way of avoiding these developments.
- c. As Salt Cross is developed there will be increased residential traffic coming towards the A4095 via Lower Road. The spine road through Salt Cross may be viewed as a way to avoid hold ups on the A40 towards Oxford and used as a 'rat run' from the A40 to the A44 via Bladon. In the opposite direction there may be those from Bladon itself, Woodstock or neighbouring villages who choose to use the Park and Ride in proximity to Salt Cross as a place to leave their cars.

09/02

3. We request - as part of the s106 contributions arising for the development - that a 20mph limit is instituted through Bladon.

09/03

This is something the village has argued for over many years and which WODC full Council supported with a motion to OCC in 2013. **We attach a paper produced by Colin Carritt of Active Travel which highlights the situation very well.** We draw particular attention to the pinch points on the road which, because of buildings on either side, cannot be widened. Already the road is dangerous to pedestrians at the pinch points as the pavements are so very narrow. This is the only way cyclists can reach Hanborough station from Woodstock – and at the pinch points the road is less than five metres wide – and adjacent to a bend.

Lower limits reduce speeds and road casualties. The National Institute for Health and Care Excellence (NICE), World Health Organisation (WHO) and Global Network of Road Safety Legislators recommend 20mph where people and motor vehicles mix, **ie. Bladon.** Department for Transport (DFT) evidence shows that lower limits reduce speed. Less accelerating / braking reduces particulates. NICE recommends 20mph without speed humps for better air quality, less noise vibration and road wear. This will be in-keeping with the development's climate change ambitions.

4. We request - as part of the s106 contributions arising for the development - a dual track at Hanborough station on the Cotswold Line

09/04

Cancellations at Long Hanborough railway station impact Bladon residents. To increase usage of this station – only a twenty-minute walk from Bladon – increased reliability would ease up on residents' cars going towards Oxford each morning and possibly through Bladon.

We look forward to receiving your response to our comments.

Yours faithfully,

Cllr D. Hambridge, Chair

Bladon Parish Council

From: Petronella Natrass [REDACTED]
Sent: 23 October 2020 17:17
To: Planning Policy (WODC)
Subject: Salt Cross Garden Village - Area Action Plan Consultation

Dear Sirs,

Further to my online response to this consultation, I would like to confirm the British Horse Society's support for the section on **Active and healthy travel** (para 8.10) which recognises the needs of horse riders and the importance of ensuring that bridleways within the area are accessible and well-connected. The Society is pleased both to have been included in the consultation and to have its views incorporated within the AAP. 10/01

Yours faithfully,

Petronella Natrass

This email is confidential and intended solely for the use of the individual or individuals to whom it is addressed.

Any views or opinions presented are solely those of the author and do not necessarily represent those of The British Horse Society or associated companies. If you are not the intended recipient be advised that you have received this email in error and that any use, dissemination, forwarding, printing or copying of this email is strictly prohibited. If you have received this email in error please contact the sender.

The British Horse Society is an Appointed Representative of South Essex Insurance Brokers Ltd, who are authorised and regulated by the Financial Conduct Authority.



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

Name of the Document to which
this representation relates:

Salt Cross Garden Village AAP (August 2020)

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

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New Yatt Road,
Witney,
Oxon.
OX28 1PB

Or by Email: planning.policy@westoxon.gov.uk

This form has two parts-

PART A – Personal Details

PART B – Your Representation(s).

Please fill in a separate sheet for each representation you wish to make

PART A

1. Personal Details

2. Agent's Details (If applicable)

Title		Mr
First Name		Andrew
Last Name		Somerville
Job Title		Associate Director
Organisation		Nexus Planning
Address Line 1		Thames Tower
Line 2		Station Road
Line 3		Reading
Line 4		
Post Code		RG1 1LX
Telephone Number		
Email Address		



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

PART B – Please use a separate sheet for each representation

Name or Organisation: CEG & Blenheim Estate

3. To which part of the Area Action Plan does this representation relate?

Paragraph Policy Policies Map

11/01

4. Do you consider the Area Action Plan is:

- | | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 4. (2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the
Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see the enclosed submission



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

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6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the enclosed submission

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.



Salt Cross Garden Village Area Action Plan

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7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To fully articulate to the Inspector the opportunity available to provide a safe and accessible route between the Garden Village and Hanborough Station and to be able to answer any questions the Inspector might have.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Andrew Somerville

Date

23/10/2020



Salt Cross Garden Village Area Action Plan

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Name of the Document to which
this representation relates:

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PART A – Personal Details

PART B – Your Representation(s).

Please fill in a separate sheet for each representation you wish to make

PART A

1. Personal Details

2. Agent's Details (If applicable)

Title		Mr
First Name		Andrew
Last Name		Somerville
Job Title		Associate Director
Organisation		Nexus Planning
Address Line 1		Thames Tower
Line 2		Station Road
Line 3		Reading
Line 4		
Post Code		RG1 1LX
Telephone Number		
Email Address		



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

PART B – Please use a separate sheet for each representation

Name or Organisation: CEG & Blenheim Estate

3. To which part of the Area Action Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Area Action Plan is:

- | | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 4. (2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the
Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see the enclosed submission

11/02



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

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Please see the enclosed submission

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To fully articulate to the Inspector the opportunity available to provide a safe and accessible route between the Garden Village and Hanborough Station and to be able to answer any questions the Inspector might have.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Andrew Somerville

Date

23/10/2020

Salt Cross Garden Village Area Action Plan – Pre-submission draft (August 2020)

Representations on behalf of CEG and Blenheim Estate

1. Together CEG and Blenheim Estate have control of a significant area of land (as shown on the plan at Appendix A) adjacent to the south of Hanborough Station and west of Lower Road, which is unconstrained by Green Belt, landscape, heritage or any other environmental designations.
2. These representations demonstrate the importance of the opportunity this land provides to facilitate greater accessibility between Salt Cross Garden Village (“**the GV**”) and railway and bus interchange facilities at Hanborough Station, to promote the use of public transport as well as encouraging walking and cycling.
3. The current planning application for the GV (reference 20/01734/OUT) proposes an inadequate, dangerous and circuitous cycling route between the GV and Hanborough Station that is unusable by pedestrians. This should be avoided through an alternative route on available land, between Lower Road to the south of the railway and Hanborough Station.

Sustainable Transport

11/01
11/02

4. The emerging Salt Cross Garden Village AAP (“**the AAP**”) places great emphasis on seeking to achieve safe and accessible transport connections through sustainable modes of travel. Through its core objectives it seeks to:

“provide integrated, high quality and convenient public transport choices centred on the Sustainable Transport Hub (incorporating the proposed Park & Ride), associated improvements to the A40 and proposed enhanced train services on the North Cotswold Line with associated station improvements at Hanborough Station” (AAP Core Objective GV19); and

“provide safe and convenient public transport and active travel connections within Salt Cross and the wider area, in particular to Eynsham, Hanborough Station and the open countryside” (AAP Core Objective GV20).

5. The ‘Movement and Connectivity Strategy: Key Overarching Principles’ of the AAP specifically requires that:

“Good walking, cycling and public transport connections must be provided to the wider area including Hanborough Station, Oxford, Witney and beyond.” (Figure 8.1 of the AAP)

6. It is important to note that the proximity of Hanborough Station supported the selection and strategic allocation of the GV in the Council’s adopted Local Plan (“**the LP**”) as a sustainable location for development. Indeed, the LP states that:

“In light of the proposed improvements to Hanborough Station a key element of the proposed garden village to the north of Eynsham will be the provision of improved connectivity between the new settlement and the station particularly by bus and cycle...” (paragraph 7.70 of the LP)

7. Failure of the AAP, and consequently a planning application, to take up the opportunities to deliver these objectives would undermine the distributional strategy underpinning the GV allocation based on the evidence of its locational advantage, as tested through the Sustainability Appraisal and with reference to alternatives. The sustainable transport opportunities at Hanborough Station are also capable of reducing polluting CO2 emissions from the GV in the context of wider climate change.

Hanborough Station

11/01
11/02
cont.

8. The AAP identifies Hanborough Station as being approximately 2.9 km to the north of the GV and serviced by hourly train services between London Paddington, Reading, Oxford and Worcester, along with additional commuter trains during the morning and afternoon peaks. Travel time to Oxford is just 10 minutes from Hanborough Station.

9. The AAP has a clear vision for Hanborough Station as:

“a modern and efficient transport and mobility hub for West Oxfordshire that is safe and accessible for all with early delivery of dedicated walking and cycling connections and frequent, integrated and reliable bus services making walking, cycling and local bus services the natural choice for existing residents and tourists accessing the station.” (AAP paragraph 8.34)

10. Along with station improvements, the North Cotswold Line Task Force, supported by Network Rail, is proposing a significant increase in train services at Hanborough Station (AAP paragraph 8.35) with up to four trains an hour (AAP paragraph 8.36).

11. The AAP refers to work undertaken on behalf of the Council to understand Hanborough Station in greater detail, and to identify how preferred improvements can be delivered¹. Priority measures include the construction of a second platform and accessible bridge across the railway.
12. The importance of Hanborough Station is emphasised by Policy 15 of the AAP, as well as making provision for the Council to seek financial contributions from development towards the North Cotswold Line Transformation generally and infrastructure at Hanborough Station specifically.
13. Hanborough Station also has increasing potential for bus connections. Currently there is just a bus stop on the A4095 to the north, but land is reserved for a new bus/rail interchange as part of residential development being delivered adjacent to the south of the station. The approved masterplan for this scheme is enclosed at **Appendix B**.
14. Such investment will reinforce the strategic role of Hanborough Station, which will become increasingly important alongside the GV, to deliver the objectives of the local plan, maximise the locational advantage and modal shift and assist in meeting the challenges of climate change.

11/01
11/02
cont.

Accessibility to Hanborough Station

15. As a key transport interchange and piece of infrastructure, routes/connections between Hanborough Station and the GV must be made as convenient, safe, attractive and accessible as possible.
16. The AAP (paragraph 8.21) identifies that the current route via Lower Road prioritises cars, and is unsafe and unattractive for cyclists and pedestrians. To address this, the AAP currently requires a segregated cycle route to be provided on the western side of Lower Road, as funded/delivered by the GV development. But this route makes no provision for pedestrians and would still require bus services to navigate the congested Lower Road/A4095 junction.
17. Indeed such a 'Hanborough Cycle Route' is proposed as part of the GV planning application (reference 20/01734/OUT). The principle of this route is welcomed, but what is proposed raises

¹ Hanborough Station Transport Infrastructure Study:
- Baseline Review (September 2019)
- Constraints & Opportunities Report (September 2019)
- Preferred Measures Report (September 2019)
- Phasing & Funding Report (September 2019)

fundamental highway safety concerns as detailed in the 'Long Hanborough Technical Note' (19/10/20) prepared by Evoke (transport consultants) and enclosed at **Appendix C**.

11/02
11/

18. These safety concerns relate firstly to the width restriction of the Lower Road railway bridge through which cyclists would have to travel. The width is dangerous – insufficient to allow a cycle and car/van/HGV space to pass simultaneously.
19. To seek to overcome this constraint, the scheme offered by the GV planning application proposes a priority arrangement, where cyclists must wait in a designated area until a gap in the oncoming or same direction traffic becomes available before passing under the railway. This is neither safe nor convenient for cyclists, discouraging such forms of travel – it would act as a major disincentive for cycle use between the GV and Hanborough Station.
20. To the north of the railway bridge, the cycleway finishes completely, requiring cyclists to re-join and share the carriageway with vehicles – again discouraging cyclists from using the route. Then cyclists must navigate the Lower Road/A4095 junction, which has a recorded cluster of injury accidents, of eight incidents within the last ten year period (as identified by the 'Long Hanborough Technical Note'), as well as taking cyclists away from Hanborough Station with a longer and more circuitous route.
21. The GV 'Hanborough Cycle Route' is not designed for pedestrians. It is too narrow to be used as a shared surface and to the north of the railway bridge it is proposed to simply retain the carriageway of the road without footway or cycleway.
22. Whilst the distance between the GV and Hanborough Station is beyond what would normally be considered to be 'walking distance', for the 'Hanborough Cycle Route' to not also make provision for pedestrians would overlook the opportunity to maximise sustainable transport options.
23. Overall, whilst a cycle link between the GV and Hanborough Station is supported in principle, the proposed route would not accommodate pedestrians and is unsuitable because of the constraints of the railway bridge and Lower Road/A4095 junction – it would not provide a safe, convenient or direct means to encourage cycling and walking for all. This element of the proposal would be contrary to the NPPF and development plan.
24. There is instead an alternative safe, accessible and direct cycling and walking route available that must be used – a southern access to Hanborough Station from Lower Road.

11/01
11/02
cont.

25. This would take the form of an access with a focus on cycle/pedestrian/bus accessibility approximately 450m south of the railway bridge, routing northwest from Lower Road, through land solely under the control of Blenheim Estate and CEG, to provide a direct connection to the southern side of Hanborough Station (via the development currently being delivered (Appendix B)).
26. For cyclists, this will be safer, more convenient and attractive than the alternative of negotiating the dangerous railway bridge and the Lower Road/A4095 junction. This route is indicatively shown in the 'Long Hanborough Technical Note'.
27. For pedestrians, the alternative would provide a viable walking route to Hanborough Station along the southern part of Lower Road, a clear benefit that is not considered achievable by the GV planning application.
28. For buses or taxis, the alternative access would provide a faster and more direct route between the GV and Hanborough Station, removing the need to pass through the difficult Lower Road/A4095 junction.
29. This route is deliverable and must come forwards at the earliest opportunity. Both CEG and Blenheim Estate would welcome discussions with West Oxfordshire District and Oxfordshire County Councils as well as Grosvenor Group in this regard.
30. The AAP already makes reference in Policy 15 to a new entrance to the station from Lower Road south of the railway. This is welcomed, but for the AAP to be effective in providing an appropriate strategy to deliver its sustainable transport objectives, the provisions of specific parts of Policy 14 (Active and Healthy Travel) and Policy 15 (Public Transport) should be strengthened as follows, as well as the addition of some further supporting text to clarify the availability of the land for the access:

Policy 14 (in part)

Segregated cycle and pedestrian provision via Lower Road to Hanborough Station shall be provided, with consideration given to a new entrance from Lower Road south of the railway, recognising the benefits it would provide in enhancing bus, pedestrian and cycling accessibility. Any such provision should deliver segregated facilities for cyclists and pedestrians also the preference within the Garden Village.

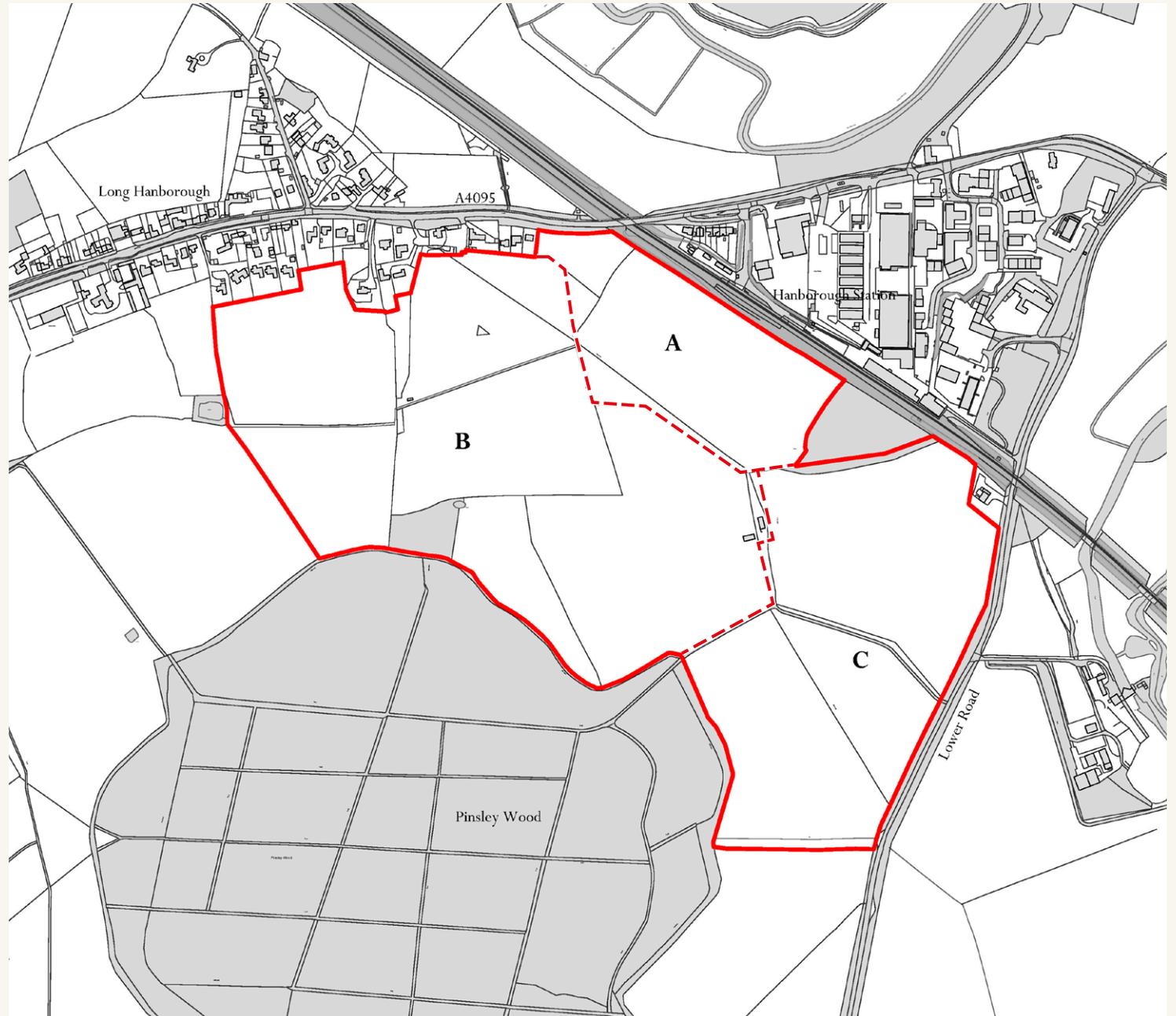
Policy 15 (in part)

Connections to Hanborough Station must be significantly improved and take account of the Masterplan being developed for the station. Consideration must be given to a new entrance from Lower Road south of the railway, recognising the benefits it would provide in enhancing with a focus on bus, pedestrian and cycling accessibility. 11/02

Additional supporting text (after paragraph 8.22)

Land for the access between Lower Road and the southern side of Hanborough Station is available by the two controlling parties. This access should come forwards at the earliest opportunity, with recognition of the important sustainable benefits it would provide in enhancing bus, pedestrian and cycling accessibility to Hanborough Station. 11/02

Appendix A

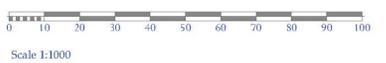


Appendix B 1



Adjacent Properties and Boundaries are shown for illustrative purposes only and have not been surveyed unless otherwise stated.
 All areas shown are approximate and should be verified before forming the basis of a decision.
 Do not scale other than for Planning Application purposes.
 All dimensions must be checked by the contractor before commencing work on site.
 No deviation from this drawing will be permitted without the prior written consent of the Architect.
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 Ground Floor Slabs, Foundations, Sub-Structures, etc. All work below ground level is shown provisionally. Inspection of ground condition is essential prior to work commencing.
 Reassessment is essential when the ground conditions are apparent, and redesign may be necessary in the light of soil conditions found. The responsibility for establishing the soil and sub-soil conditions rests with the contractor.

- Indicative Proposed Attenuation Areas
- Existing and Proposed Trees and Hedges
- Proposed Stone Wall
- Green Infrastructure
- Play Area
- Potential Railway Facilities
- Class D1 Use
- New Homes
- Garage / Car Barn
- Residential Curtilage and Gardens
- Retained Public Right-of-Way
- Repositioned Agricultural Access to Adjacent Field



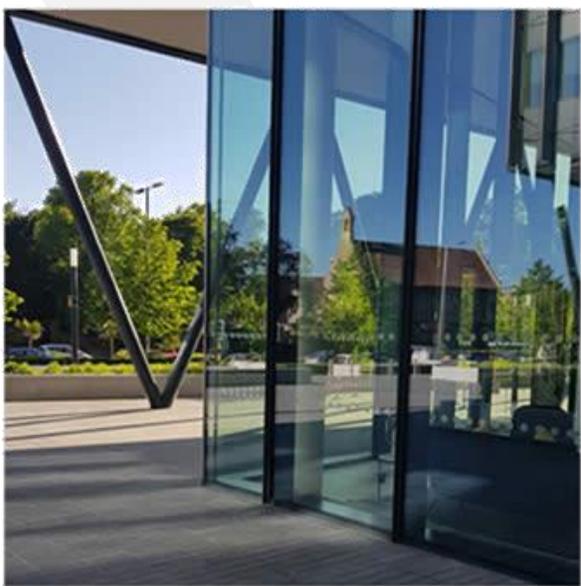
Rev.	Date	Description	Initials
PROJECT		Land Adjacent to Hanborough Station	
TITLE:		Illustrative Master Plan	
SCALE:		1:1000 @ A1	
DATE:		27/08/2015	
DRAWING No:		5847/002	
DRAWN BY:		ATM	

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Appendix C



LONG HANBOROUGH

TECHNICAL NOTE

19 October 2020



LONG HANBOROUGH

TECHNICAL NOTE

PROJECT DETAILS	
Project Name:	Long Hanborough
Client:	CEG and Blenheim Estates
Document Type:	Technical Note
Document Reference:	R-19-0015-02
Date:	19 October 2020

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APPROVAL					
Number:	Name:		Position:	Date:	Modifications:
01	Author:	Jon Williams	Consultant	16/10/2020	
	Checked:	Richard Stacey	Managing Director	19/10/2020	
	Approved:	Richard Stacey	Managing Director	19/10/2020	

1. Lower Road Cycleway

1.1. Context

1.1.1. Evoke Transport Planning Consultants Ltd (Evoke) has been commissioned by CEG and Blenheim Estate to review the proposed provision of a 'Hanborough Cycle Route' proposed as part of the Oxfordshire Garden Village (OGV) Outline Planning Application (Ref: 20/01734/OUT). The key objectives of this report are to:

- Summarise and analyse the benefits as well as constraints and limitations of the proposed cycle route along Lower Road;
- Outline a potential alternative cycle route and provide assess the key benefits in transport and highways terms of the alternative route.

1.1.2. A plan showing the extent of the proposed Hanborough Cycle Route is attached at **Appendix A**.

1.2. Salt Cross Garden Village Proposal

1.2.1. The Applicant recognises the need to facilitate and improve opportunities for active travel between the OGV and Hanborough Station, therefore proposes a 'Hanborough Cycle Route'; a 2.5m off-carriageway cycle path to be delivered within highway land to the west of Lower Road between the OGV and Long Hanborough. The proposals also include the introduction of a 40mph speed limit along Lower Road. The principle of this cycle infrastructure is welcomed, however there are fundamental highway safety issues which need to be addressed and overcome prior to determination.

1.2.2. The proposals also include the provision of cycle hire facilities within the Garden Village and Hanborough Station; this proposal is supported in principle and would help to encourage the uptake of cycling across a wider range of user groups.

1.2.3. A known constraint of Lower Road is the rail bridge, at which point the cycleway is being proposed as an on-carriageway route up to the Lower Road / A4095 junction. The carriageway width at the bridge is reduced to 3.8m which would leave cyclists with approximately 0.8m should a HGV and cyclist pass simultaneously and 1.8m should a car and cyclist pass simultaneously (not allowing for a safety margin). This width falls significantly short of the minimum requirement for a cycle lane of 2.0m.

1.2.4. In an attempt to overcome this constrained width, Stantec Drawing 39298/5501/008 (Rev.A), proposes the provision of a priority arrangement under the rail bridge, including associated signage and cyclist waiting areas. Whilst this arrangement could help to overcome the space constraints of the carriageway, during peak hours (of which the OGV is anticipated to generate between 20 – 131 two-way vehicle trips), this arrangement could lead to an increase in journey time delays as a result of vehicles stacking at the priority line with no capacity testing assessment outlined within the Transport Assessment to suggest otherwise. Whilst details of the number of cyclists anticipated to use the cycleway have not been provided within the application, in its proposed form it is less likely that cyclists of all abilities would use the route owing to the safety concerns and potential delays owing to the priority arrangement. This constraint will act as a major disincentive for cycle use between the OGV and Hanborough Station.

1.2.5. To the north of the rail bridge, no segregated cycle route is proposed, forcing cyclists to rejoin the carriageway. Whilst the proposals suggest a reduction in the speed limit from 60mph to 40mph, which will be subject to a TRO and cannot be guaranteed at this stage, the requirement for cyclists to share the carriageway with vehicles is likely to discourage less able cyclists from using the route. This is further outlined within the Local Transport Note 1/20 (DfT, 2020) which states that the use of road markings or cycle symbols should not be used in isolation for roads with high speeds, such as that of Lower Road which is currently derestricted. Opportunities to provide a continuation of the segregated provision should be pursued; failure to do so would result in a piecemeal cycle infrastructure provision which does very little to provide a safe and convenient route to the station and encourage cycling to become the mode of choice for trips from OGV to the rail station.

1.2.6. In addition to navigating the rail bridge, the proposed cycleway is required to utilise the Lower Road / A4095 junction which has a recorded cluster of personal injury accidents in addition to highway capacity constraints. The Transport Assessment does not identify an existing highway safety issue with the junction, however through

an assessment of Crashmap it is evident that the junction has had three incidents recorded within the latest five-year period (one of which involved a cyclist) and eight within the latest ten year period. The provision of a cycle route via this junction is not considered to be 'safe' or 'convenient' access to the station, both of which were identified as key transport principles for the garden village.

- 1.2.7. Overall, whilst the provision of a cycle link between the OGV and Hanborough Station is supported in principle, the proposed route is unsuitable to the north of the Church Road / Lower Road junction (because of the constraints of the railway bridge and A4095 junction) and would not provide a safe, convenient or direct means to encourage cycling for all. At present, the proposed route is approximately 4.0km to the nearest access point to the OGV equating to a 15-minute cycle; however issues along the proposed route to the north of Church Road present as a barrier to the usability of this route. An alternative route should be pursued to the north of the Church Road / Lower Road junction to maximise the potential for use amongst future residents, including cyclists of all abilities.

1.3. Alternative Cycle Route

- 1.3.1. An alternative route could be secured and delivered without ransom approximately 450m south of the rail bridge should that land also come forward for development. This would take the form of a cycle road, routing northwest from Lower Road, through land under the control of Blenheim Estate and CEG, to provide a connection to the south of Hanborough Station (via the development currently being delivered). An indicative plan showing the potential alternative route has been attached at **Appendix B**.

- 1.3.2. The proposed link through would provide clear and material benefits including:

- A more direct, segregated off-road route reducing the distance between the OGV and Hanborough Station from approximately 4km (using the proposed route) to 3.3km, which would equate to an approximate 12-minute cycle (3-minute journey time saving) and 35-minute walk (9-minute journey time saving);
- Avoid the Lower Road rail bridge which has space constraints and is likely to limit the attractiveness and safety of cycling between the OGV and Hanborough Station whilst also contributing to potential journey delays;
- Bypass the Lower Road / A4095 junction, which has experienced a cluster of injury accidents as well as highway capacity issues.

- 1.3.3. As detailed within the Transport Assessment submitted with the OGV application, "the proposals on Lower Road are not fixed by this initial concept design and it may be that other options for connections across to the station may become viable alternatives over time". Using land within the Blenheim Estate's and CEG ownership provides this viable alternative which can be delivered at an early stage; an opportunity to provide more direct, 'quick, segregated, safe and convenient' connections between the OGV and Hanborough Station, all of which are cited as key principles of the OGV and within Policy EW1a of the Local Plan.

Appendix A – Lower Road Cycleway

SEE 39289-5501-007 FOR CONTINUATION



KEY:

— HIGHWAY BOUNDARY

LOWER ROAD SPEED REDUCTION TO 40mph



PROVISION OF 2.5m CYCLEWAY WITH 0.5m SAFETY STRIP

69.0m

PROVISION OF 2.5m CYCLEWAY WITH 0.5m SAFETY STRIP

3.2m

5.9m

EXISTING SIGNAGE TO BE REVIEWED AND RELOCATED AS NEEDED

PROVISION OF PED/CYCLE DIRECTIONAL/ JOURNEY TIME SIGNAGE

Pelican House

GP

College Farm

CHURCH ROAD

74.9m

5.9m

3.0m

SEE 39289-5501-005 FOR CONTINUATION

Mark	Revision	Date	Drawn	Chkd	Appd
A	UPDATED CONTINUATION DRAWING REFERENCES	10 03 20	BH	SS	-

SCALING NOTE: Do not scale this drawing - any errors or omissions shall be reported to Stantec without delay.
 UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake their own investigation where the presence of any existing sewers, services, plant or apparatus may affect their operations.

Drawing Issue Status
FOR INFORMATION

**LOWER ROAD, EYNHAM
 CYCLE ROUTE TO HANBOROUGH
 PART 4**

Client		
Date of 1st Issue	Designed	Drawn
29.01.19	JM	JM
A3 Scale	Checked	Approved
1:1250	AW	SS
Drawing Number	Revision	
39298/5501/006	A	



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READING
 Tel: 01189 500 761

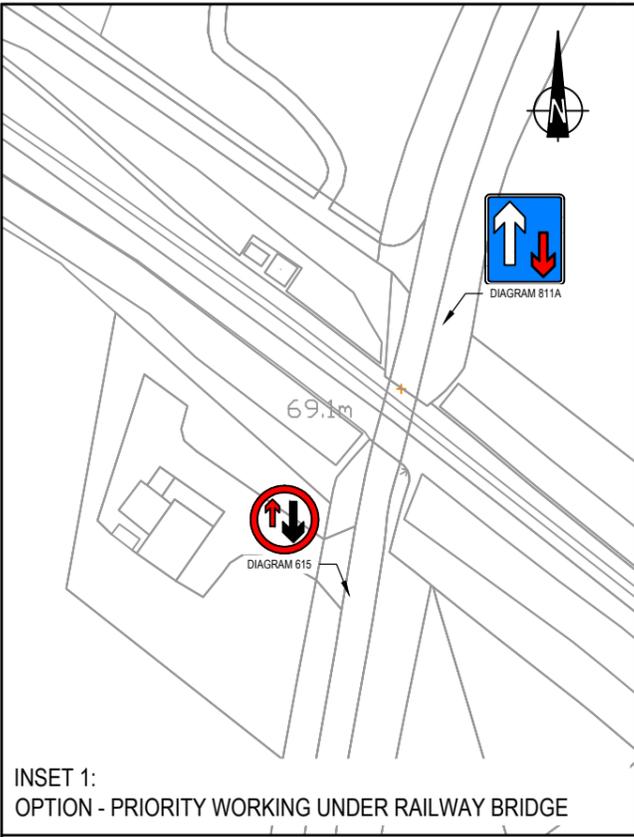
SEE 39289-5501-039 FOR CONTINUATION

NOTES:

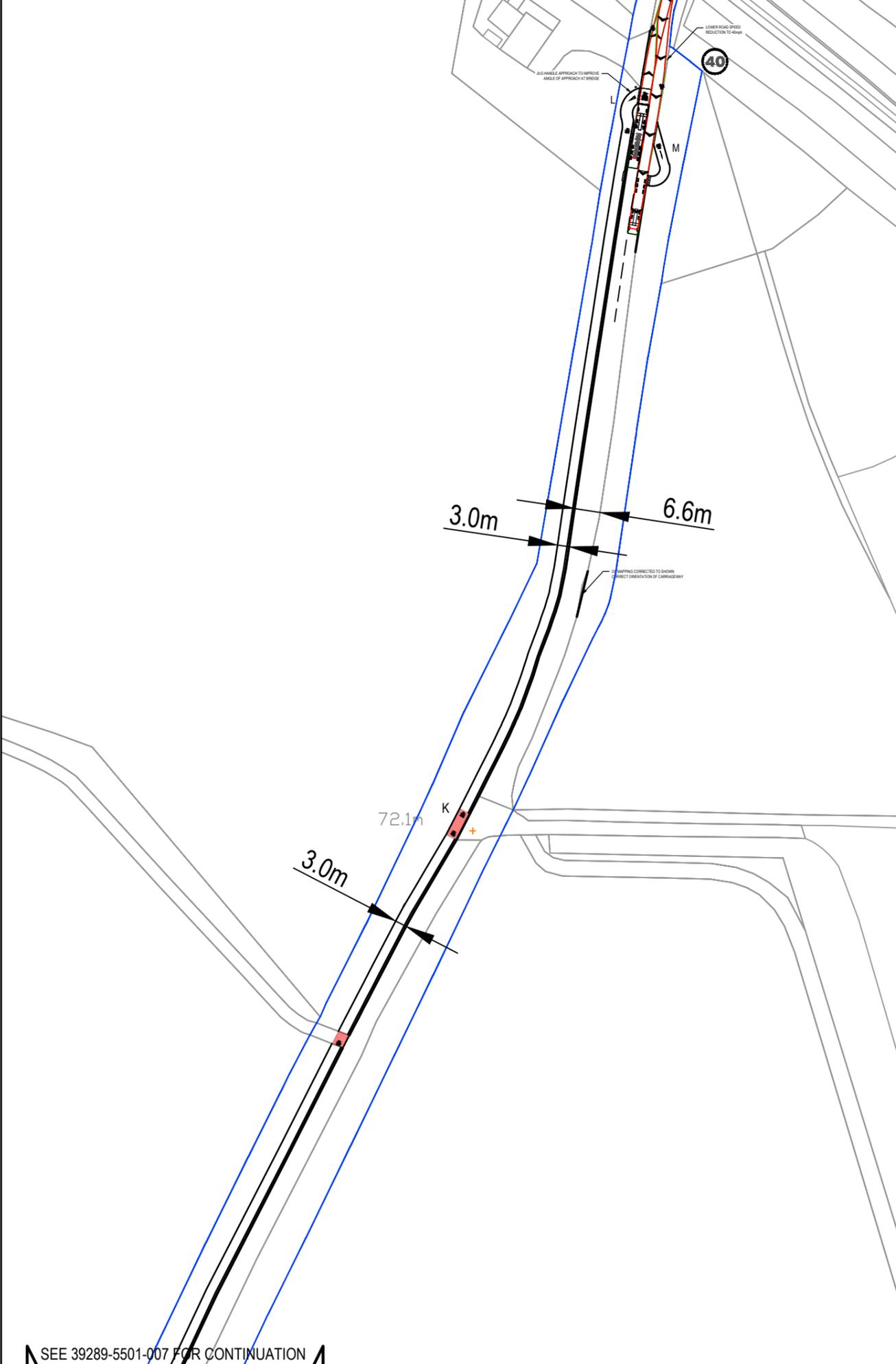
120m x 1m IN ACCORDANCE WITH DMRB TA 90 / 05, TABLE 3.4

KEY:

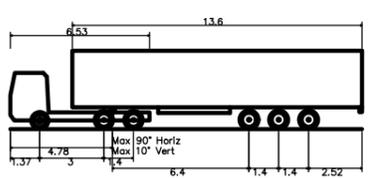
— HIGHWAY BOUNDARY



INSET 1:
OPTION - PRIORITY WORKING UNDER RAILWAY BRIDGE



VEHICLE PROFILE



Articulated Vehicle (16.5m)	
Overall Length	16.500m
Overall Width	2.550m
Overall Body Height	3.681m
Min Body Ground Clearance	0.411m
Max Track Width	2.500m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	6.530m

VEHICLE SPEED - 15MPH

A	UPDATED CONTINUATION DRAWING REFERENCES	10 03 20	BH	SS
Mark	Revision	Date	Drawn	Chkd
				Appd

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Drawing Issue Status

FOR INFORMATION

LOWER ROAD, EYNSHAM
CYCLE ROUTE TO HANBOROUGH
PART 6

Client			
Date of 1st Issue	Designed		
29.01.19	JM	JM	
A3 Scale	Checked	Approved	
1:1250	AW	SS	
Drawing Number		Revision	
39298/5501/008		A	

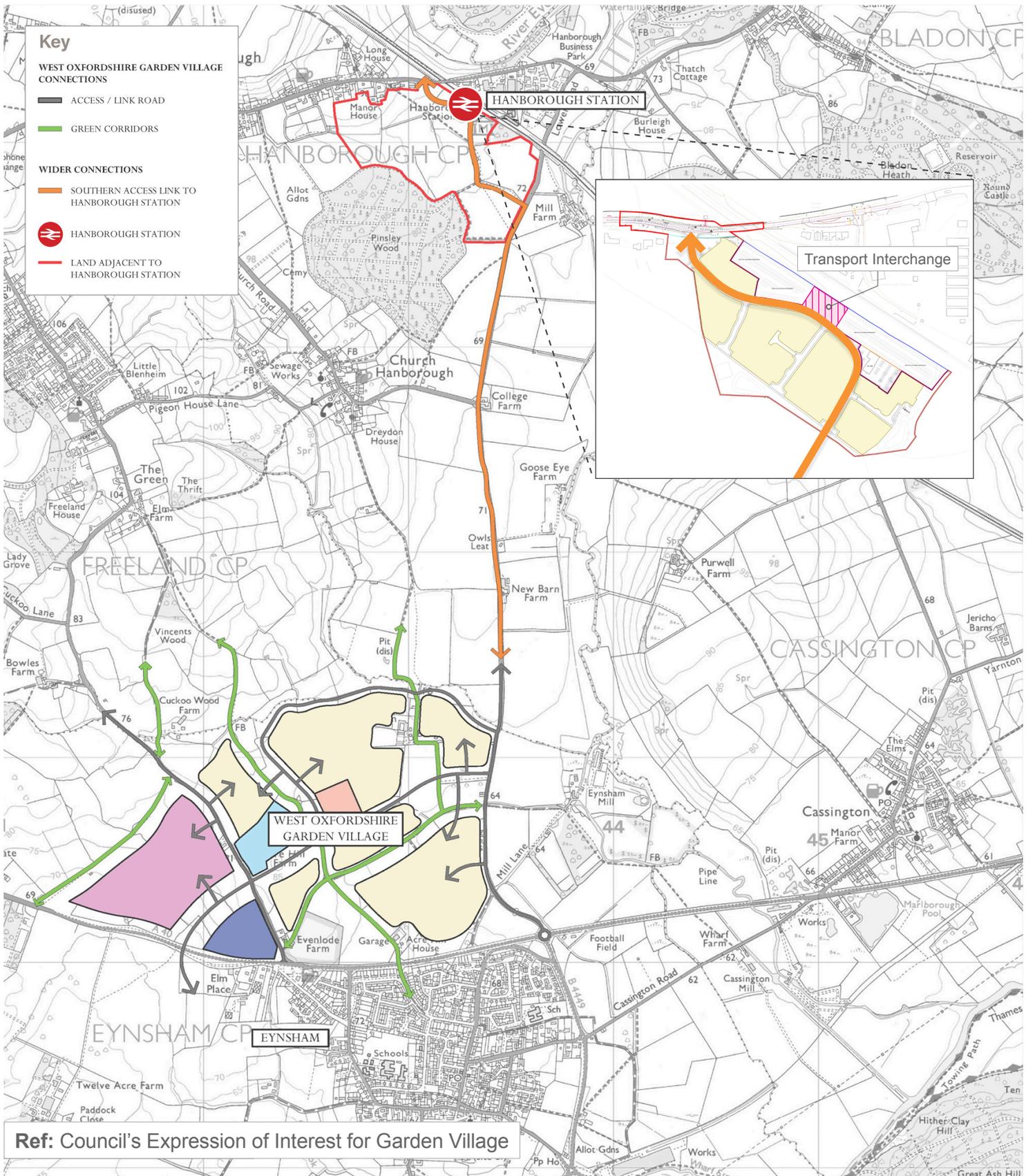
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SEE 39289-5501-007 FOR CONTINUATION

Appendix B – Potential Alternative Route



Ref: Council's Expression of Interest for Garden Village

Response from the Collaborative Housing Hub to the Salt Cross Garden Village Area Action Plan.

1. Introduction and background

- 1.1. Collaborative Housing is the community-led housing hub¹ for the Thames Valley region. The hub supports all types of community led housing, including collective custom and self-build housing. The hub's role includes helping groups to get started, providing technical and project management support throughout development projects, working with landowners to find a community-led approach to delivering sites and helping Local Authorities understand the possibilities for community-led approaches in their areas. 12/01
- 1.2. This response considers the role of community led approaches in the Area Action Plan (AAP). The AAP has itself been informed by a scoping report completed by Collaborative Housing in June 2020, a document which can be found in the evidence section of the SCGV AAP website page.²
- 1.3. The AAP acknowledges that a key principle of Garden Villages is the community ownership of land and long-term stewardship of assets and this has been identified as one of the key issues for the AAP. The scoping report identifies that all the key themes inter-relate and this is true of community ownership which has a strong history of effective legacy management, creating strong and healthy communities and meeting housing need in a flexible and effective manner. A recent report from Capital Economics carried out an analysis of the value for money of community led housing which estimates the wellbeing value of volunteering and resident engagement in community led housing equate to just under £1,575 per home per year.³

2. Housing delivery

- 2.1. The AAP highlights the opportunity for custom and self-build homes of which cohousing is explicitly highlighted as a feature of the original Garden City ethos (para10.60). as required as part of the overall housing delivery on the site. This requirement should include a provision for 50% of any plots to be affordable. This would allow for more integrated schemes with a mixture of tenures that could be accessed by those on a variety of incomes. The self-build includes the ability for community groups to bid for a group of plots. This could include cohousing projects which would form part of the community led housing offer on the site.
- 2.2. The Pre-Submission AAP includes an evidenced 98 registrant households from the Right to Build Register to 31st March 2019 (para 10.62). As per the Self-build and Custom

¹ Community-led Homes, Find your local hub ([link](#))

² Collaborative Housing (2020) 'Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village' [[Accessed through WODC's Salt Cross Garden Village AAP Consultation Page](#)]

³ Capital Economics (2020) 'Housing by the Community for the Community, An assessment of the value for money of community led housing in England'

Housebuilding Act 2015⁴, the measure from this register should be treated as a dynamic figure and as the SCGV scheme phases progress these base period numbers will need to be monitored against the issuing of planning permissions in the District as a whole.

- 2.3. We welcome the inclusion of Communal Housing as a form of delivery which meets Specialist Housing Needs. **We would assert very strongly that there is evidenced demand in the UK housing market for Communal Housing and key academic and trade literature supports this**⁵ as well as demand for the factors that communal housing meets such as knowing neighbours or common space⁶. The case study of Marmalade Lane within the wider Orchard Park development is very applicable to the SCGV. At Marmalade Lane, people moved from all across the country to live in those homes so seeing any measure of demand as limited to West Oxfordshire does not reflect market characteristics. Evidence of Communal Housing is almost entirely brought forwards as a form of self-build and custom-build housing and, when combined with evidence around need, could thus be a 'requirement' on the SCGV in Policy 26 with the same conditions applied through a sales time-period as self-build and custom-build homes.
- 2.4. The CoHoHub has been working with a group of people referring to themselves as Eynsham Cohousing, who have a desire to take forward a cluster of plots within the first phase of the SCGV as a single cohousing scheme of between 15-40 homes (standard range of units within a cohousing scheme). The exact requirements will become more detailed in the following year, but we would assert that the existence of this group should be seen as evidence for Communal Housing in Policy 26.
- 2.5. The CoHoHub supports locating the Custom and Self-build Housing in clusters of serviced plots as per para 10.69. **A distinction should be made in this paragraph between individual self/custom-builders and associations of self/custom-builders.** These clusters will have the potential to be brought forward as a discrete planning application from one 'association', (e.g. a cohousing group) for just that cluster or as part of a wider reserved matters application by the developer of that phase. In that case consideration should be given to some kind of 'cluster passport' which would allow for these homes to be designed as a group including in having shared communal space.
- 2.6. Clearly the price of plots should reflect whether it is for private sale or affordable housing and community groups would need the opportunity to work up a bid for the site. A key issue for groups seeking affordable self-build opportunities is raising the finance for the purchase of the land and so some kind of staged payment approach, perhaps through a custom home builder may help enable this. Utilising the existing capital of self-builders and social investors, as well as any government grant for first-time buyers or affordable housing, could enable a cohousing group to purchase the land using established lenders⁷. This could be advantageous to the master developer in bringing finance at early stages of development and offsetting sales risk.

12/02

⁴ s.2a, Self-build and Custom Housebuilding Act 2015 ([link](#))

⁵ UK Cohousing Trust, Publications ([link](#))

⁶ Community-led Homes (December 2019) More than Housing: Communities making supportive, affordable, secure homes, together

⁷ Lenders to the community-led housing sector require a planning consent and tend to stage payments from start on site.

3. Long term maintenance and stewardship

- 3.1. The potential role for the form of Community Trust is largely dealt with under 'Building a strong, vibrant and sustainable community' (Chapter 11). This lists the potential range of organisations that could become the long-term stewardship organisation including several entities that are community-led through their governance structures. This includes Community Land Trusts, Development Trusts, Community Interest Companies and Co-operative Societies. The scoping report recognised that there is **further work needed on this aspect of the development and acknowledges the potential for a wholesale transfer of the site into a form of community led ownership**. The final proposals will be laid out in Community Management and Maintenance Plan (CMMP) and the hub is willing to engage with this process.
- 3.2. Policy 27 Key Development Principles includes ensuring consistency with the Garden City Principles. Policy 31 anticipates a new, independent body with support in the early phases. An important element of being consistent with this is the requirement that the Garden Village Trust be an open and democratic organisation⁸ which could be added as a third general principle in para 11.90 to ensure good representation.
- 3.3. The CoHoHub encourage the statement in para 10.76 which connects the use of Community Land Trusts and Cohousing groups with ensuring that the 'Garden City principle of long-term stewardship for the benefit of future residents in perpetuity'. We similarly welcome the recognition in the AAP Policy 25 of the ability of both Registered Providers (RP) and Community Land Trusts⁹ to deliver and manage affordable housing. To access affordable housing grant and ensure standards we would still expect any Community Land Trust to be an RP or become so in the early stages of the project.
- 3.4. The scoping report identified strong interest from stakeholder interviewees in the formation of a Community Land Trust on the Salts Cross site as well as potential residents of a cohousing group. Since the scoping report was produced, Collaborative Housing have presented to the Eynsham Parish Council and undertaken initial workshops with interested residents and community groups. There still remains a desire to form a Community land Trust who as a body could engage with the production of the CMMP. The Collaborative Housing Hub is engaged to work with the founding group on some clear visioning and objective setting that could be translated into a costed proposal that could demonstrate how the organisation would be structured. The hub is currently investigating sources of funding to support this work, although early stages of this work could be funded immediately through the resources of the hub.
- 3.5. The scoping report indicated that a new stewardship organisation could be incubated by another organisation which could provide robust administrative infrastructure in the early years until the group develops its own resources, and the CMMP proposal will include options for this. There are a number of organisations that could support such an emerging trust, the Land Trust as mentioned and the Oxfordshire Community Land Trust could work together with the Parish Council to provide the support and structure for a new group and the hub is investigating the potential of funding to resource this.

⁸ As per 5(b) of s79 Housing and Regeneration Act 2008

⁹ as defined alongside RPs as an English Body in s79 of the Housing and Regeneration Act 2008

- 3.6. By forming this new community-led organisation early in the planning process it will be an important forum for the representation of the views and wishes of its membership who will comprise of local residents and grow as SCGV residents start to live on site. The CoHoHub would like to see the language of core objective GV37 to remove 'in consultation with' and instead state '...garden village in participation with, and for the benefit of, the whole community' to recognise an ambition for community-leadership.

Collaborative Housing October 2020

Combe Parish Council
Salt Cross Garden Village - Area Action Plan Consultation
Response of Combe Parish Council - October 17, 2020

In August 2019, Combe Parish Council submitted its response to the Oxford Cotswolds Garden Village Area Action Plan - Preferred Options consultation. The Council asks for these comments to be taken into account.

Further, the Parish Council met last week and discussed the current Salt Cross Garden Village - Area Action Plan Consultation and asks for its additional views, as follows, to be considered:

1. The scale of development will have a detrimental impact on the landscape and social fabric of Eynsham and its environs. It is difficult to see how the proposals will 'respect the historic architectural and landscape character of the locality' and 'enhance the character and quality of the surroundings' as claimed. 13/01
2. A development of this scale is likely to increase the potential for flooding in a locality already prone to this. As stated in the WODC Local Plan, developments should mitigate the effects of climate change, not exacerbate them. 13/02
3. The impact of a development of this scale on traffic and congestion is likely to have detrimental effects on surrounding villages, even given the proposed changes to the A40, Freeland road network, and the addition of a Park and Ride facility at Eynsham. The emphasis on the Hanborough-Oxford rail link (notoriously unreliable) as part of an effective transport hub is unconvincing. A better integrated approach to public transport to both Hanborough and the new Park and Ride is needed. 13/03
- 4 Combe Parish Council also supports views already expressed in other submissions, including, the following: 13/04
 - Policy / Strategy: 'The planning application must follow the Garden Village (GV) principles (draft AAP, fig.2.3) and the WODC's Area Action Plan (AAP); the OPA (Outline Planning Application) should not be determined until the AAP is adopted.'
 - Also, it is concerning that many critical issues and many which relate to the garden village principles, will be left to 'reserved matters' stage.

Combe Parish Council

- Climate Emergency: No mention of mitigation (reducing greenhouse gas emissions) or zero carbon development (Policy 2). Climate Change does not appear at all in the Development Specification and Framework.)
'The standards proposed for house building fall short of net zero carbon and would require costly retrofit. It makes no sense to build homes now that will need upgrading.'

- Biodiversity and habitat: 'How do we know that the habitat and biodiversity enhancement will definitely happen? How can the very small and isolated 'arable planting mitigation areas' compensate for the loss of arable plants from a site identified in the Arable Plant Survey as a whole of European importance? Does the scheme support the statement in the Design and Access Statement 5.4 that 'the most sensitive areas have been conserved'?'

- Future Development: 'There are significant parts of the site within the control of the applicant (Blue Line Plan) but excluded from the planning application. Will this land be protected from further development? Why is there no Landscape and Visual Assessment? (LVIA).'

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

- Water and Sewage: ' Thames Water have "raised capacity concerns due to the size of the development" and the "impact it will have on their potable water network" ('Utilities Appraisal Report'). Thames Water are proposing a "new gravity sewer" and "a new strategic pumping station", whose location, however, is to be confirmed". The garden village and West Eynsham "might necessitate new or upgraded waste water treatment infrastructure", but this will be "further discussed and resolved through the master planning processes". The handling of an issue as important as sewage should surely not be so vague at this stage.' Combe Parish Council has long had concerns about the constant pollution of local rivers from raw sewage discharge

- Transport: 'It is of concern that many of the crucial issues of movement, parking and charging infrastructure are subject to reserved matters and many matters need resolution before construction begins. Traffic modelling analysis in

13/04
cont.

Combe Parish Council

the Transport Strategy of the OPA shows, for example, over 1500 additional morning peak time trips causing increased significant A40 delays and queues between Eynsham roundabout and Cassington (and on the Hanborough road and at the Toll Bridge). This modelling also shows that the proposed Park and Ride and bus lanes may help accommodate the additional volume of GV trips, but without any benefits for other road users (made even worse by an additional 7000 dwellings proposed in Witney and Carterton up to 2031 and 1000 at West Eynsham.) 13/04 cont.

'The proposed A40 dualling between Witney and Eynsham will not resolve the A40 problem.'

'The Garden Village, West Eynsham development and A40 improvements should be planned together by all the interested parties and the Garden Village and West Eynsham should not be started until the A40 problem has been resolved'.

Combe Parish Council made the same point in its initial response concerning the proposed development

Combe Parish Council: We understand the Garden Village was initially seen as contributing to tackling Oxford's unmet housing need. But, in the light of recent significant national / international change (Brexit, Covid), we query the evidence of continuing need, now that growth targets have been reduced. 13/05

From: John Histon [mailto: [REDACTED]]
Sent: 25 October 2020 09:12
To: Planning (WODC)
Cc: John Histon
Subject: Attn; Salt Cross Area Action Plan Committee

Subject: Salt Cross Development Area Action Plan
Date: 23 October 2020 at 08:25:35 GMT
To: planning@westoxon.gov.uk
Cc: John Histon [REDACTED]

Area Action Plan.Planning Policy Committee. CPRE comments

Dear Sirs

With regard to the above development we as CPRE West Oxfordshire Committee, are concerned that there are a number of Important issues that are not adequately covered at this stage of the developments process. If not addresses in detail now, firm polices are put in place, this scheme will have disastrous effects on environmental issues infrastructural issues and social issues on the surrounding communities. 14/01

We comment firstly on the inadequate provision in detail, proposal for the management of flood water, which is at this moment none existent.

Eynsham has existing a flood problem, this massive development will if not carefully designed to alleviate this current problem, must ensure the new development does not exacerbate the overall flood situation.

We see no exact detailed proposals on this issue.(Note Thames Water are also concerned.) The same absence of any detail proposals with regard to Foul Sewerage Treatment, for this scheme. A vital factor now in any development in West Oxfordshire, where the pollution of the river network is becoming a National Scandal. Note again there are no existing treatment plants locally that can handle this scale of development, we look forward to seeing a solution tabled.

We move on to traffic issues which are a massive issue particularly in this immediate area on the A40. Current proposals for a Park and Ride scheme are, we consider, totally in the wrong place. It will be useless for that immediate area and for the proposed Salt Cross development. 14/02

The vast amount of traffic passing through this area on the A40 is heading for the main employment areas on the Ring Road or going through to London and its conurbations, a very small volume to Oxford Town .

The volume of traffic on the A40 will be compromised if the current Park and Ride is implemented.

The strategically best location for a Park and Ride for Oxford is we consider to be Witney.

The solution for the A40 will never be resolved until the commercial traffic to the main employment areas of Oxford and the London bound traffic are diverted onto the RingRoad where it crosses the A40 before the final roundabout, which has been improved but again is at capacity already.

No provision for local transport between the two communities old and new has not seem to have been considered , vital for integration of communities, where is the thought on this issue?

CPRE West Oxfordshire, are concerned that there are major omissions still at this stage in the development proposals, on such a major scheme, that will have consequences on the existing environment in a negative way, unless addressed now.

The Area Action Plan needs to have all this omissions resolved in detail before progressing this scheme, to any further stage.

We look forward to examining the resolutions achieved .

John Histon RIBA FCI Arb

Chairman – CPRE West Oxfordshire District



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John Histon RIBA FCI Arb
Chairman – CPRE West Oxfordshire District



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

Name of the Document to which
this representation relates:

Salt Cross Garden Village Pre Submission Draft AAP Aug 2020

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

By Post: Planning Policy,
West Oxfordshire District Council,
Elmfield,
New Yatt Road,
Witney,
Oxon.
OX28 1PB

Or by Email: planning.policy@westoxon.gov.uk

This form has two parts-

PART A – Personal Details

PART B – Your Representation(s).

Please fill in a separate sheet for each representation you wish to make

PART A

1. Personal Details

2. Agent's Details (If applicable)

Title		Mr
First Name		Paul
Last Name		Slater
Job Title		Associate
Organisation	Bike Safe	Edgars Ltd
Address Line 1		The Old Bank
Line 2		39 Market Square
Line 3		Witney
Line 4		
Post Code		OX28 6AD
Telephone Number		
Email Address		



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

PART B – Please use a separate sheet for each representation

Name or Organisation: Bike Safe

3. To which part of the Area Action Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider the Area Action Plan is:

- | | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 4. (2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the
Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached statement



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached statement

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bike Safe are promoting a cycle path along the B4044 between Eynsham and Oxford and seek to ensure appropriate linkages with the Salt Cross Garden Village

Please see attached statement

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Paul Slater

Date

22/10/2020

EDGARS

Salt Cross Garden Village Pre Submission Consultation 2020 - Bike Safe Comments

Introduction

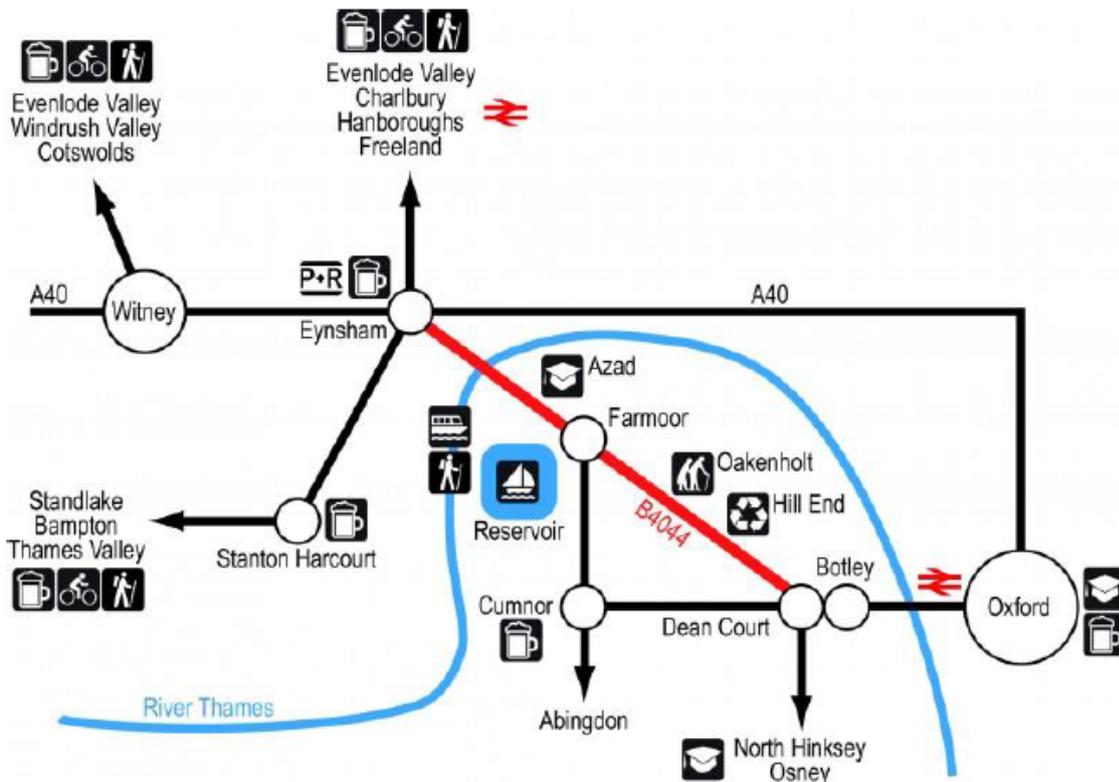
Bike Safe a registered charity promoting an off road multipurpose path for cyclists and pedestrians along the B4044 between Eynsham and Oxford . The path will provide a strategic link for active travel along the B4044 between the Salt Cross Garden Village and Oxford.

15/01

The need to invest in active travel in and around Oxford has been highlighted in the recent National Infrastructure Commission (NIC) report 'Running out of road: Investing in cycling in Cambridge, Milton Keynes and Oxford, June 2018'. This recommends that five high-quality segregated or low-traffic routes should be created, including along Botley Road and continuing beyond the city boundary to Eynsham along the B4044 (paragraph 70).

The B4044 path is part of the Oxfordshire County Council transport strategy and Bike Safe are working collaboratively with Oxfordshire County Council to progress the design of the path to a shovel ready position. Feasibility design for the path is due to be complete by early 2021.

Figure 1 Strategic Location of the B4044 Path



The Old Bank
39 Market Square
Witney OX28 6AD

01865 731700
enquiries@edgarslimited.co.uk
edgarslimited.co.uk



Directors: Jayne Norris BA(Hons) MSc DipTp MRTPI, David Norris BA(Hons) MRICS AMaPS, Jon Westerman BA(Hons) DipTp MRTPI
Associates: Paul Slater BSc(Hons) MSc MRTPI

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Bike Safe previously commented at the issues consultation stage during 2018 and preferred options stage in 2019. Bike Safe considers that its previous comments continue to be relevant and that:

- A wider active travel strategy for the site and its integration with Eynsham and Oxford is required;
- The B4044 path will provide a key active travel link for development at the Salt Cross Garden Village and there is a requirement through the AAP to ensure that active travel to facilities at Eynsham and on to the B4044 and Oxford are comprehensively and effectively provided before housing is occupied.
- A Local Cycle and Walking Investment Plan (LCWIP) should be developed early on in the AAP process to form a key part of the development framework for the Salt Cross Garden Village. The LCWIP must be prepared in accordance with the principles and standards of good cycling design as set out in LTN1/20; see <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>
- A pedestrian and cycle crossing, either underpass or bridge, over the A40 should be provided at the eastern end of the development close to the existing A40 Eynsham roundabout due to the safety, convenience and connectivity this can provide.
- Development within the Salt Cross Garden Village should make appropriate contributions towards the implementation B4044 of the path.

Further comments are identified below in relation to Policy 14 of the Pre submission Consultation document.

Policy 14 – Active and Healthy Travel – Financial contributions towards the B4044 path

Bike Safe support the requirement within Policy 14 for the provision of financial contributions towards the B4044 path.

15/02

The B4044 path is a key route between the Salt Cross Garden Village, Eynsham and Oxford. It offers a shorter route into Oxford via Botley and will link to active travel improvements along the Botley Road (currently under construction). The B4044 (and Botley Road) has been recognised as one of 5 key strategic cycle routes into Oxford by the National Infrastructure Commission.

Although a shorter route into Oxford, at present the B4044 is unsafe for cycling. The traffic impact from the Salt Cross Garden village will worsen conditions for cyclists and other active travel users along the B4044 without the construction of the B4044 cycle path.

As such it is considered that financial contributions towards the B4044 path from strategic developments at Eynsham including the Salt Cross Garden Village are necessary.

Bike Safe are working in collaboration with Oxfordshire County Council to develop the design of the path. Feasibility design for the whole route up to the Salt Cross Garden Village at Eynsham is expected to be complete by early 2021 with the feasibility design of the path between Eynsham and the edge of Botley complete by November 2020.

The path is as yet un-funded. The Salt Cross Garden Village is the most significant development within the context of the B4044 path and as such should make a major contribution to funding the cost of the B4044 path.



Policy 14 – Active and Healthy Travel – A40 crossings

Bike Safe object to the lack of a grade separated crossing of the A40 toward the eastern side of Eynsham and specifically to link to the B4044 Path. Bike Safe consider a grade separated crossing should be provided at the B4449/A40/Lower Road roundabout.

15/02
cont.

The B4044 path will connect to the A40 along the B4449 to join the A40 at the B4449/A40/Lower Road roundabout.

Bike Safe supports the improvements to cycle paths along the A40 and the development of a cycle path along Lower Road to Hanborough Station. Along with the B4044 path, the B4449/A40/Lower Road roundabout will become a confluence of segregated high quality cycleways promoting a range of strategically significant active travel movements including:

- Cycle access for Eynsham residents towards Hanborough Station and by rail to Oxford, London and in future Didcot/Science Vale
- Cycle access for Garden Village residents towards Oxford along the B4044 path (which will become the shortest, most continuous and convenient cycle route connecting to Oxford along the Botley Road - where strategic cycle improvements are under construction)
- Cycle access for Eynsham residents to Oxford along the A40

Bike Safe consider the proposed at grade signalised crossings in this location (including at Hanborough Road) inadequate to sufficiently promote active and healthy travel and that a further grade separated crossing is required.

A grade separated crossing of the A40 at the B4449/A40/Lower Road roundabout has been considered within the evidence base – in particular the report by Mott Macdonald 'Non-motorised crossings of the A40 at Eynsham 24 April 2020 FINAL REPORT'.

The report identifies at 4.3.1 that 'Designing for Cycle Traffic (CD 195) stipulates that for a road with 40mph or 50mph speed limit and over 6000 vehicles per day, as the A40 at Eynsham will have in future, a grade-separated crossing is preferred...'

The report also identifies in Section 2 that:

- the A40 in the vicinity of Eynsham carries up to 2700 vehicles per hour (over 30,000 vehicles per day)
- Existing crossing facilities along the A40 are limited and of poor standard including one signalised crossing and two unsignalised
- From 2013 to 2018 the only reported accidents in the study area affecting cyclists or pedestrians occurred at the Eynsham roundabout, where two cyclists suffered serious injuries and two suffered slight injuries.

Bike Safe consider that the evidence in the Mott Macdonald report clearly identifies that grade separated crossings of the A40 are necessary to promote active travel and also that

Bike Safe also consider that a grade separated crossing is required at the B4449/A40/Lower Road roundabout due to the confluence and linkage of the A40, Lower Road and B4044 strategic cycle paths.



Further, the spatial framework for the Garden Village identifies that residential development will be east and north of Cuckoo Lane making a crossing of the A40 at the B4449/A40/Lower Road roundabout a natural desire line for residents to access the B4044 path and Oxford.

Bike Safe support the provision of a grade separated underpass at Cuckoo Lane as a natural desire line for Eynsham residents to access the new school facilities, technology hub and park and ride. Bike Safe consider the garden village will create a further natural desire line for a grade separated crossing further to the east also.

Options for a grade separated crossing of the A40 near the B4449/A40/Lower Road roundabout are considered in the Mott Macdonald report including:

- Zone 6 Hanborough Road
- Zone 7 Eynsham Roundabout

15/02
cont.

The report concludes both options were within the best performing and were taken forward for concept refinement. This is summarised in the Oxfordshire County Council officer response July 2020 at the start of the document which states:

The three best performing crossing options that were taken forward to Concept Refinement were:

A subway between Old Witney Road and Cuckoo Lane. A bridge was not considered feasible due to overlooking, residential access issues and land acquisition implications.

A bridge near Hanborough Road and the Eynsham roundabout.

A bridge towards the Western Development roundabout. This option was not considered to be a preferred shorter term solution due to its relatively peripheral location in respect of the allocated sites

The study concluded that the 'best performing option' was a bridge near Hanborough Road and Eynsham Roundabout with the level of the A40 lowered by 3 metres through integration of the works taking place as part of the A40 Corridor (HIF) improvements. Without lowering of the A40, this option had issues with overlooking of residential properties and access to existing dwellings.

The Oxfordshire County Council officer response July 2020 then goes on to state

Having considered the study findings, OCC officers concluded that lowering the A40 by 3 metres near Hanborough Road was not feasible due to cost and construction implications. It was also considered that a bridge near Hanborough Road was not as well located to meet future pedestrian and cycle desire lines compared to a grade separated crossing at Old Witney Road/Cuckoo Lane, particularly given the proposed locations of the schools within the Garden Village.

Bike Safe object to this conclusion due to the failure to independently take forward for refinement a grade separated crossing at the Eynsham Roundabout (Zone 7) which does not require any lowering of the A40.



The Mott Macdonald report identifies that a straight bridge near the Eynsham Roundabout (zone 7), scored equally as well as a bridge at Hanborough Road without A40 lowering (zone 6). The report went on to conclude a bridge at Hanborough Road (zone 6) with the A40 lowered was the best performing.

The Mott Macdonald report then only took the Hanborough Road with the A40 lowered option (zone 6) forward for refinement where it was subsequently concluded in the OCC officer response that lowering of the A40 was not feasible due to cost and construction implications.

Bike Safe identify that the Mott Macdonald report demonstrates sufficient land for a bridge over the A40 at the Eynsham Roundabout (Zone 7) without lowering the A40 and associated cost and construction implications.

A crossing at the Eynsham Roundabout is very well located in relation to cycle desire lines for residents of the garden village to access the B4044 path and on to Oxford, and access for Eynsham residents to access Lower Road cycle path for access to Hanborough Station.

Bike Safe consider that following the dismissal of the Hanborough Road (Zone 6) crossing option due to lowering of the A40, a bridge over the A40 at the Eynsham Roundabout (Zone 7) without such lowering should have been further assessed and included within the requirements of Policy 14.

Bike Safe accordingly object to Policy 14 in relation to the lack of a requirement within the policy for a grade separated crossing at the Eynsham Roundabout (B4449/A40/Lower Road roundabout) and the failure to adequately test this as an option within the evidence base.

Accordingly Bike Safe consider this part of Policy 14 to be unsound as it is not justified i.e. not an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

15/02
cont.

creating a better place



Mr Chris Hargreaves
West Oxfordshire District Council
Planning And Leisure Services
Elmfield New Yatt Road
Witney
Oxfordshire
OX28 1PB

Our ref: WA/2006/000262/AP-01/PO2-L01
Your ref:
Date: 23 October 2020

Dear Mr Hargreaves

Salt Cross Garden Village Draft Area Action Plan

Thank you for consulting us on the above plan.

In this letter we provide you with our specific points of soundness as well as points relating to accuracy and clarity, where we are suggesting an amendment but we do not think the matter makes the plan unsound.

We support many of the principals and policies within this plan, some of which have been incorporated following our previous recommendations.

1. Support

We are supportive of your vision for the environment of this area, specifically in reference to tackling climate change and the delivery of quality green space. 16/01

Climate action

We are supportive of your core objectives GV1 – GV4 and your recognition of the value of natural capital and reference to eco system services. In turn we support policies 1 – 3 particularly in relation to the development needing to respect the sites natural capital value and climate change. 16/02

Healthy place shaping

We support reference to the natural environment in Figure 6.1 which makes a commitment to protecting and enhancing natural assets and creates a clear relationship between green and blue infrastructure which can often be overlooked. However, this recognition doesn't entirely carry through within the Green Infrastructure chapter. 16/03

While watercourses and areas of floodplain are shown in Fig 6.3, which we support, these assets are not reflected within your Green Infrastructure Vision or Key Characteristics and we advise that additional wording is included to fully reflect the checklist in Fig 6.1. While we do not think this omission would make the plan unsound,

Cont/d..

it would provide consistency with other parts of the plan which refer to green and blue infrastructure as a joint entity. The Green Infrastructure heading on page 66 should also be changed to read Green and Blue Infrastructure.

Protecting and enhancing environmental assets

We are supportive of policy 9 - biodiversity net gain and the requirement for the development to achieve a 25% net gain in addition to a commitment for long term management of habitats provided to meet this target. The policy requires the net gain strategy to include a long term management plan for a minimum of 30 years which we support in general. However, we would like to see a minor alteration to this wording as some habitats (i.e. deciduous woodlands) can take decades to reach maturity and maximum biodiversity value, and 30 years may not be sufficient. We would recommend using the wording “in perpetuity” or similar to encourage continual on-going management so the value of these assets are not ever lost, possibly with the assistance of community action groups.

16/04

We support reference to developers being encouraged to achieve greater water efficiency than the 110 litres per person required by local plan policy OS3.

16/05

We support paragraph 7.92 where there is a commitment to ensure any watercourse crossings are clear span. This not only protects flood flow but also biodiversity corridors.

We support wording of policy 10 – water environment where it requires a sequential approach to layout, with no built development within areas identified as being at risk of flooding with a 70% allowance for increased flooding as a result of climate change. We are also supportive of the policy requirement to explore opportunities to reduce surrounding flood risk and reference to natural flood management techniques.

2. Points of soundness

We consider this plan to be unsound in its current form due to issues relating to the evidence base used to inform the plan in relation to infrastructure capacity and delivery. We advise that the plan fails the tests of soundness in terms of being positively prepared, justified and effective or consistent with national policy.

The 2016 Water Cycle Study (WCS) showed that there are constraints at Cassington sewage treatment works due to the forecasted growth in this area and a new Dry Weather Flow would be required. There were also issues highlighted at this works due to flooding in 2007 and 2014. The WCS was a phase 1 scoping study and highlighted issues where growth would need infrastructure improvements. From this no other study has been carried out, and we advised in our previous response that a more detailed WCS was required. This is necessary to not only understand where there is infrastructure capacity issues, but also where there is environmental capacity concerns.

16/05
cont.

The WCS looked at infrastructure and concluded that upgrades would be required but not whether the forecasted growth and increase in foul discharge would deteriorate the water quality in the receiving water. The next step would be to carry out modelling to understand if increasing the DWF would cause a deterioration in the receiving waterbody and if this was the case could the deterioration be mitigated with tighter permit limits and whether these permit limits were technically feasible.

Paragraph 7.85 of the Area Action Plan, the recommendations of which are reflected within Policy 10, places the onus on the developer to undertake a detailed assessment

of waste water network capacity and the impact of capacity constraints on the environment. However, this more in depth look at infrastructure improvements and environmental capacity needs to be carried out to inform the Area Action Plan as there may not be environmental capacity for the predicted level of growth and this may impact upon the successful delivery of the proposed development.

The initial WCS scoping study highlighted areas which would have capacity issues with all the planned growth in the area and that upgrades would be required to infrastructure. The Infrastructure delivery plan and updated report on infrastructure, detail where improvements are required and that phasing of occupation may need to take place while all the upgrades are carried out. This will protect against over burdening the network and causing possible pollution incidents. What these documents do not tell us is whether there is environmental capacity within the receiving watercourse for additional effluent from the new development, without causing a deterioration in water quality. There must be no deterioration of water quality under the Water Framework Directive and development must not hinder a waterbodies ability to achieve Good status. An updated WCS is required to demonstrate the environmental impact and to determine whether environmental permits are achievable to protect water quality. The outputs and recommendations of the study should be used to inform the Area Action Plan in order to be consistent with national planning policy (paragraph 170).

16/05
cont.

The Garden Village has a forecast of 2200 houses and there are plans for a further 1000 houses as part of the Oxford shortfall so it is important to look at all the proposed development together and not in isolation.

3. Points of clarity and accuracy

The Strategic Flood Risk Assessment (SFRA) dated May 2019, used to inform this plan, is out of date. We provided you with comments on an updated version of the SFRA in August 2020 and it is clear that our recommendations have been included within the Area Action Plan. However, for clarity and accuracy, the most up to date SFRA should be submitted as part of the examination.

16/06

Closing comments

Once again, thank you for contacting us. We would welcome the opportunity to work with you to address our concerns.

If you have any queries please contact me.

Yours sincerely

Miss Sarah Green
Sustainable Places - Planning Advisor

Direct dial [REDACTED]

Direct e-mail [REDACTED]

Planning Policy
West Oxfordshire District Council, New Yatt Road
Witney OX28 1PB



Garden Village Area Action Plan Consultation: A Response from EPIC and GreenTEA

23 October 2020

This is a fuller version of the community letter prepared by EPIC and GreenTEA to the West Oxfordshire District Council's Garden Village Area Action Plan (AAP) pre submission draft, August 2020. We can see that much of the AAP takes forward our comments on previous stages of the AAP and from extensive consultation. In particular, we welcome the progressive focus of this plan in terms of WODC taking Climate Action seriously and we hope others will be inspired by a true exemplar. As we deal with the pandemic, many are calling for a 'green recovery' which reassesses our connection with the planet in the way we live, travel and work, rather than returning to business as usual. There has never been a better time to take action.

17/01

In replying to the consultation we have benefitted from the expertise of the Eynsham Smart and Fair Futures Inspiration Panel who have added examples and evidence, particularly in low carbon construction and renewable energy.¹

We acknowledge that most residents oppose the principle of major development around Eynsham and fear that the quantity of new housing will put unsustainable pressure on overstretched infrastructure. We welcome genuinely affordable housing for recognised local need. However now that the site for the Garden Village is in the adopted Local Plan EPIC and GreenTEA hope that it will be a true exemplar village, demonstrating Garden Village principles and good practice in terms of minimising environmental impact, and excellent place making with high specifications for housing design, meeting zero carbon standards, while providing benefits to the area as a whole. As one of our Inspiration Panel said '*We should be looking to use the Garden Village designation as an opportunity to really showcase exemplar placemaking and sustainable house building*'. We therefore generally support the ambition and policies set out in the Area Action Plan (AAP) pre-submission draft and welcome the statement: '*the District Council having recently declared a climate emergency, the vision is focused on climate action, which forms a golden thread running through the whole AAP in areas such as sustainable construction and renewable energy, waste, the water environment, transport, design and biodiversity*'. We also welcome the focus on delivering Garden Village principles.

The policies are generally underpinned by sound evidence including studies commissioned for the AAP, for instance the Infrastructure Delivery Plan, Zero Carbon Studies and the Community Land Trust Report. In some cases, further surveys and reports are required of the applicant and the effectiveness of policy will depend on the rigour with which these requirements are enforced and assessed. It is welcome that the Infrastructure Delivery Plan is one study that covers the cumulative impact of development including the West Eynsham SDA on our area, as this is a key concern of residents, but this report recommends a range of future actions to ensure a co-ordinated approach. We also acknowledge that many of our former consultation responses are reflected in the policies which take account of our community's expressed needs for climate action that also enhances biodiversity, health and well-being while protecting the natural landscape.

Overall we consider that the policies are sound: positively prepared, justified and effective- although we do make suggestions to improve effectiveness and we offer some additional evidence. To be effective, several Policies and section 12 Delivery and Monitoring Framework need more quantified

¹ <https://www.lowcarbonhub.org/p/a-smart-and-fair-future-for-eynsham-low-carbon-hub-grants-programme/>

measures of success and failure, a timescale and details of how this process will be resourced and monitored in the long term.

In addition, to improve legibility and navigation, we think that the AAP would benefit from better cross referencing: there are multiple references to topics where the Policy is in another section. For clarity, we also suggest more cross reference is made between measures and Policies.

Below we consider each theme of the AAP, comment on core objectives and the soundness of evidence, how it is reflected in Policy and in some cases follow this with suggested amendments to improve clarity or effectiveness, or list further supporting evidence.

Part 3 The strategy

5. Climate action

We welcome the greater focus on climate action and support core objectives GV1- 4 and related policies for climate action, resilience, zero carbon and zero waste.

17/02

Commentary on soundness of Policies, core objectives and supporting evidence

The urgent need to address climate change is now beyond doubt. It was reported on 7 October that, yet again records were broken and September 2020 was the warmest on record.² The following day no less figures than Sir David Attenborough and the Duke of Cambridge launched the £50m 'Earthshot' prize with the ambitious goal of "repairing the planet by 2030"³ and the Met Office has just confirmed that 3 October 2020 was the wettest day since records began in 1891 and that future weather extremes are likely to break new records⁴ We need to act now.

It is also important to note that there are many other changes are needed before 2050 to achieve net zero emissions, many outside this project's control, over and above Passivhaus, PV, EVs, buses etc.

Policy 1- Climate Resilience and Adaptation

This is one of the most important goals of the Garden Village which we support with its emphasis in natural capital. Elements of this general policy are covered in further detail in later policies (eg green infrastructure, design principles, water environment, movement and connectivity) which all have an effect on greenhouse gas emissions or sequestration. It is not just woodland that plays a role; there is increasing evidence of the role of soil and meadows, particularly wet meadow in carbon sequestration. We note that in section 5.23 the potential to save costs by reducing pesticide and herbicide use is mentioned. We would like to see a greater ambition embraced: Salt Cross should be designated, from the outset, as a community which is free of pesticide (i.e. insecticide, herbicide, fungicide and rodenticide) use, especially as much of the land is currently farmed organically. This would have many health and ecological benefits and reduce the emissions from chemical inputs. See suggestion under Policy 31 (management) but this should also apply to the clearing and construction phase.

17/03

² <https://climate.copernicus.eu/surface-air-temperature-september-2020>

³ <https://earthshotprize.org>

<https://www.bbc.co.uk/news/science-environment-54435638> . It is the largest ever environmental prize

⁴ <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/mid-october-statistics>

<https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/sukb-2020-updates>

Suggestions- Policy 1

We suggest that the policy could usefully include cross reference to other related Policies. For instance the reuse of materials in construction or the use of materials derived from waste are part of natural capital and also reduce embodied energy.

5.24- **omit** reference to wood fuel, which is not now considered a zero carbon resource: it would require an increase in forested area to be climate neutral in the longer term and also emits particulates which damage health.⁵

Add that undisturbed soil, grassland and particularly wet meadow also store carbon.

Add that Salt Cross will be a pesticide free community from construction to completion (cross refer Policy 9 and Policy 31).

Evidence

*'In most UK towns and cities it is currently impossible to avoid exposure to pesticides. However, a growing number of places around the world have already gone pesticide-free and are proving that it can be done. Urban pesticides are unnecessary and should be banned immediately in order to protect human health and the environment.'*⁶ Bans or phase-out commitments have already been made in 32 communities in the UK.⁷

Policy 2– Net-Zero Carbon Development

The AAP policy is consistent with national and local policy as well as the Eynsham Neighbourhood Plan; there is wide local support for climate action, shown by WODC's recent survey⁸ and this document demonstrates climate leadership in the run up to UK hosted COP26. WODC has secured impressive evidence on the need for and the feasibility of taking action to achieve a net - zero energy positive development, notably the report from Elementa on construction and energy standards, whose authors (sustainability experts, engineers, architects and cost consultants) were also co-authors for the widely quoted LETI *Climate Emergency Design Guide* which calls for radical action and pathfinder projects now.⁹ This guide is also endorsed by Grosvenor. If we are to meet the challenge of climate change, Passivhaus or equivalent building techniques are needed to reduce heating demand in all buildings to less than 15kWh/m²/yr, as well as energy efficiency (EUI) targets, modelling of overheating and reduction in embodied carbon, in accordance with Policy 2– Net-Zero Carbon Development. We fully endorse the Policy standards for net zero construction, reduced embodied energy, no gas, 100% renewable energy and long term monitoring, with minor suggestions below. Reduction in embodied carbon will become more important (as a proportion of emissions) as the grid decarbonises and operational energy use is lower. High fabric standards also have an important role in reducing the cooling needed in a warming climate. We support the principle that renewable energy should mean new provision, ideally on site (rather than a green tariff for example) and that a range of renewable technologies should be provided to all residential and non residential buildings. In this respect the required viability assessment will need thorough scrutiny and challenge, especially if left to reserved matters stage and take account of the opportunities for Eynsham identified under Project LEO (see further detail below).

In terms of climate action, the case for maximising generation of renewable energy is clear; producing This exemplar development cannot wait for the expected decarbonisation of the national grid: every opportunity must be taken to produce zero carbon energy. There will be sectors in our economy that will struggle to become net zero, such as manufacturing, steel production etc., as well as existing

⁵ <https://www.fern.org/publications-insight/burning-trees-for-energy-is-no-solution-to-climate-change-340/>

⁶ <https://www.pan-uk.org/pesticide-free/>

⁷ <https://www.pan-uk.org/pesticide-free-towns-success-stories/>

⁸ <https://www.westoxon.gov.uk/environment/climate-action/climate-action-and-what-we-are-doing/>

⁹ <https://www.leti.london/cedg> The free guide has already been downloaded more than 15,000 times. See also UK Green Building Council Policy Playbook <https://www.ukgbc.org/wp-content/uploads/2020/03/The-Policy-Playbook-v.1.5-March-2020.pdf>

buildings with poor energy performance, which are difficult to upgrade. This means that where renewable energy can be generated and used on site, such as the case of rooftop solar PV in the garden village amongst other technologies, it must be maximised.¹⁰ Further, the electricity load from the no-gas development will be higher relative to older development (using gas for heating), so every attempt should be taken to offset this load, by increasing renewables, reducing demand and providing assurance to homeowners that even though their heating is powered by electricity their energy bills will not be high. As we move towards greater use of electricity for heat and transport, general electricity demand will increase, and we need to take every opportunity to increase clean energy supply.

Policy 2 also avoids the cost of retrofit which would be inexcusable in an exemplar project. This is consistent with Secretary of State for Housing, Communities and Local Government Robert Jenrick's Statement on August 1st 2020 that "We will build environmentally-friendly homes that will not need to be expensively retrofitted in the future..."¹¹ It also future proofs the development against weather extremes such as overheating. These extremes are an increasing risk, as highlighted by a Met Office Report on 22 October 2020; any new data should be used in modelling.¹²

Many garden villages have excellent aims but struggle to reach the exemplary zero carbon standards set out in the Salt Cross AAP. We consider that Eynsham is particularly well placed to achieve net zero carbon objectives and to become an inspirational exemplar in the use of smart energy. Many elements are in place: a committed community, an excellent Oxfordshire community energy CIC in the pioneering Low Carbon Hub¹³, a supportive District Council, the expertise and research excellence of the Oxford Universities, world leading research and local businesses such as Siemens developing smart control technologies - plus the Garden Village which should be zero carbon energy positive. This offers the one-time opportunity to incorporate the optimum features and layouts for zero carbon and for integration with an existing community and make the best use of the proposed smart energy hub and other potential at the adjacent the park and ride. We are fortunate these skills are brought together under Project LEO (Local Energy Oxfordshire) '*one of the most ambitious, wide-ranging, innovative, and holistic smart grid trials ever conducted in the UK*' funded by Innovate UK¹⁴ and that the Eynsham area is now a Project LEO Smart and Fair Neighbourhood project. The Low Carbon Hub has been highly effective in delivering community renewables at scale: their installations currently generate 4MWp and this is predicted to increase to nearly 30MWp in three years.¹⁵ GreenTEA has a long working relationship with the Low Carbon Hub and Eynsham hosted their first community owned PV installations as part of the Peoples' Power Station: we are very keen for this concept of clean energy for community benefit to be extended in any new development.

17/04
cont.

Project LEO brings significant resources and skills to help make this vision a reality. Transition Eynsham Area (GreenTEA)¹⁶ has been active for over 11 years and is working hard to support zero carbon development. We contributed to the Garden Village Energy Plan and lead the local steering group for the Eynsham Smart and Fair Futures Project, along with the Low Carbon Hub, WODC's Climate Change Manager and renewables experts. The project covers Salt Cross but also the surrounding primary distribution area which includes Eynsham Parish (and parts of others). This makes Eynsham the largest Smart and Fair Neighbourhood area in the county and will develop the transition to a smarter, flexible zero carbon electricity system with fair access for households, businesses, and communities to realise the opportunities and benefits it will bring. The main tasks are to develop a Zero Carbon Energy Action

¹⁰ The site is also suitable for technologies that need earth movement to install them such as heat banks, ground source heat pumps and water source heat pumps

¹¹ <https://www.telegraph.co.uk/politics/2020/08/01/radical-necessary-reforms-planning-system-will-get-britain-building/>
However this approach is partly dependent on decarbonising the grid and does not concentrate sufficiently on reducing demand for heating

¹² <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/sukb-2020-updates>

¹³ <https://www.lowcarbonhub.org/> <https://peoplespowerstation.org>

¹⁴ <https://project-leo.co.uk/>

¹⁵ Low Carbon Hub Business Plan 2020-2023

¹⁶ <https://eynsham-pc.gov.uk/org.aspx?n=GreenTEA>

Plan for the whole Eynsham Primary Substation Area; to develop the long-term stewardship proposals; to develop proposals and business models to achieve net zero, including proposals for the development of the Smart Energy Hub; to apply this to the West Eynsham Strategic Development Area; to engage with the community and ensure that it benefits from new development and can influence quality of development. Smart systems will mean that the village will send power back the grid through locally generated renewable electricity, home and vehicle batteries: the garden village would be a virtual power plant.

This Energy Action Plan is a testing ground for the Local Area Energy Plans which will be required under RII0-2.¹⁷ The Smart and Fair Futures project has the added advantage of being community led, which will facilitate the social and behavioural change and hence demand management which the National Grid's Future Energy Scenarios acknowledge as a key component of achieving net zero.¹⁸

17/04
cont.

We conclude that the zero carbon aims of the AAP are sound, exceptionally well supported and achievable.

Suggestions and clarifications- Policy 2

Embodied carbon should be better defined (see below 5.53 definition- eg substitute the LETI Embodied Carbon Primer definition and include UK and non UK emissions.¹⁹ Full life cycle carbon modelling should be required rather than encouraged and some authorities suggest targets should be lower, eg RIBA targets below and suggestions for reducing embodied carbon (eg recycled materials, timber, reduced cement and low CO2 alternatives). Even if buildings are net zero operational carbon with some reduction in embodied carbon (as required by Policy 2) there will certainly be residual emissions which are not covered. The developer should be required to submit calculations of the emissions from the development, both embodied and operational, and to offset / sequester the residual emissions in an approved approach, which could usefully include a contribution to a carbon fund to upgrade the energy performance of existing buildings in Eynsham (see evidence below).

Zero operational carbon balance *'100% of the energy consumption required by buildings on-site should be generated using on-site renewables, for example through Solar PV'* **add** the Energy Strategy should consider existing and emerging technologies including ground source and air source heat-pumps, district heating, solar PV and solar thermal and energy storage.

We suggest that under Policy 2 the anonymised measurement and verification results should also be available to residents and the management organisation. We also recommend funded provision of independent site inspection of building quality to address the 'performance gap'.

Para 5.24- mentions woodfuel: this should be deleted: it is not a zero carbon heating solution and it damages local air quality, as noted above.

Para 5.38 - should include the Low Carbon Hub as a project LEO partner.

Para 5.40 – this paragraph needs updating. It is true that Eynsham Park and Ride was considered as a Project LEO plug in project, but the timescale for energy elements to become operational is beyond the LEO project. We understand elements such as EV charging, vehicle to grid and solar canopy are still under consideration, so these could be considered legacy projects which will feed into the longer term aim of the Eynsham Energy Action Plan. However please **ADD** the current Project LEO Eynsham Smart and Fair Futures energy project and associated business models and long term stewardship.

In connection with the Smart and Fair Futures project, very much regret the omission of *Preferred Policy Approach 33 – Decentralised, Renewable and*

¹⁷ RII0-2 Business Plan Guidance – Ofgem www.ofgem.gov.uk › system › files › docs › 2019/0

¹⁸ <https://www.nationalgrideso.com/future-energy/future-energy-scenarios>

¹⁹ <https://www.leti.london/ecp>

Low Carbon Energy from the Preferred Options Paper July 2019. *‘To include within the AAP, a requirement for development of the garden village to be underpinned by an ambitious and pro-active approach to decentralised, renewable and low carbon energy at a range of different scales from site-wide to property specific. To also include a requirement to consider as part of Project LEO, the potential for an integrated, low carbon energy system within the garden village and to maximise linkages with existing or proposed renewable and low carbon energy infrastructure in the locality.’*

While we realise that some aspects of renewable energy are covered in Policy 2, but strongly **recommend** that some of this text is inserted in Policy 2 under *Zero operational carbon balance* and supporting text so that the opportunities brought by Project LEO Smart and Fair Futures and the related smart, decentralised, renewable energy systems are realised.

5.66 and Policy 3 – Towards ‘Zero Waste’ Through the Circular Economy

We support the aim of increasing material re-use and recycled materials, which could extend well beyond using aggregate recycled adjacent to the site. This will clearly have a beneficial effect on calculations for embodied energy (required under Policy 2).

17/05

Additional evidence

1 Construction

Para 5.43 explains that costs will reduce as zero carbon building becomes mainstream and this is beginning to happen. Expertise is also spreading and the resultant homes which are comfortable and cheap to run are proving popular and address fuel poverty. York is planning to build 600 Passivhaus social homes in an exemplary car free neighbourhood.²⁰ Stirling Prize winner Goldsmith Street is a development of 100 Passivhaus social homes.²¹ Leeds City Council’s Climate Innovation District is an exemplar sustainable scheme of over 520 new low carbon home and there is a 225 low carbon house development at Parc Eirin near Cardiff.²² We have Oxfordshire Passivhaus expertise too: local contractor Greencore has recently completed 25 passivhaus dwellings, both custom self build and affordable homes at Southmoor. Hook Norton CLT is also planning a development of Passive houses..²³ There are other examples at varying scale of developments exceeding current building regulations at the Beacons in Hemel Hempstead, Gusto Homes, Lincoln and the Wintles, Shropshire.²⁴

17/06

Other recent Passivhaus projects include the large University of the West of England (UWE) masterplan of approximately 65,000m² and providing 2250 new student residences. This carbon neutral phased development would become the largest Passivhaus student accommodation in the world, with work on site starting in 2021. Not confined to housing, progress is advancing with St Sidwell’s Point, the UK’s first Passivhaus leisure centre & pool.²⁵

There are many other examples of low energy building in the Low Energy Building Database.²⁶ The ‘groundbreaking exemplary’ Lancaster Cohousing Project (registered in 2006) led the way Passivhaus and is built on ecological values.

²⁰ <https://www.theguardian.com/artanddesign/2020/oct/04/everest-zero-carbon-inside-yorks-green-home-revolution>

‘The city plans to build Britain’s biggest zero-carbon housing project, boasting 600 homes in car-free cycling paradises full of fruit trees and allotments. When will the rest of the UK catch up?’

²¹ <http://www.mikhailriches.com/project/goldsmith-street/#slide-2> Exeter has built several schemes to Passivhaus principles.

<http://www.ecodesign.co.uk/projects/residential/chester-long-court/>

²² <https://leedscitycentre.vision.co.uk/home/south-bank/climate-innovation-district-phase-2> <https://citu.co.uk/>

<https://www.parceirin.co.uk/>

²³ <https://www.greencoreconstruction.co.uk/portfolio/springfield-meadows-southmoor>; <https://www.hn-lc.org.uk/what-were-doing/community-housing>

²⁴ <https://thebeacondevelopment.co.uk/> <https://gustohomes.co.uk/woodlands-edge/>

<http://www.thelivingvillagetrust.com/the-wintles/>

²⁵ <https://www.passivhaustrust.org.uk/news/>

²⁶ <https://www.lowenergybuildings.org.uk/projectbrowser.php>

There are many inspiring examples in Europe; for instance Freiburg, Germany has been a leader since the 1970s in low carbon living and community renewable energy at scale.²⁷

The Passivhaus Trust have much useful guidance which demonstrates the advantages of Passivhaus construction, not least that construction is inspected and monitored, avoiding the construction performance gap. *Passivhaus Costs & Benefits* (October 2019) 'shows that innovation costs associated with early Passivhaus projects are now reducing as the methodology has become more widely adopted. Costs are expected to fall further once the Standard is adopted at scale.' Other relevant recent publications include *Easi Guide to Passivhaus Design* (Levitt Bernstein 2018); *UK Passivhaus and the energy performance gap* (Rachel Mitchell & Sukumar Natarajan, University of Bath October 2020) 'Results conclude that Passivhaus provides a reliable means of obtaining low-energy and low-carbon buildings'; and *Passivhaus the route to zero carbon March 2019*²⁸

Embodied carbon: LETI Embodied Carbon Primer defines embodied carbon as: 'The carbon emissions emitted producing a building's materials, their transport and installation on site as well as their disposal at end of life'.²⁹ The RIBA climate challenge states embodied carbon for domestic buildings should be below 450 kgCO₂e/m² by 2025 and < 300 kgCO₂e/m² by 2030: this is more ambitious than Policy 2.³⁰

The UKGBC does include embodied and operational emissions in its definition of Net Zero.³¹ NB UK Government's Net Zero target only includes emissions made within UK territory and excludes emissions from international shipping and air transport and the production of goods and services that the UK imports from other countries, meaning that imported materials would not be accounted for but are part of the carbon footprint.³²

17/06
cont.

Energy

We are at a critical time. On 13 October the international Energy Authority reported 'World Energy Outlook 2020 shows how the response to the Covid crisis can reshape the future of energy.'³³ As set out above, there is substantial local support and expertise in the field of zero carbon energy, notably through Project LEO, under which the ambitious Eynsham Smart and Fair Futures energy project is now proceeding, with Transition Eynsham Area (GreenTEA) an active member. As Barbara Hammond CEO of the Low Carbon Hub said at their AGM on 17 October, there is now a consensus on how to achieve a zero carbon energy system - so now is the chance to demonstrate our knowledge. Inspiration also comes from Europe where communities are pioneering energy self-sufficiency projects, shifting from individual buildings to the neighbourhood level.³⁴ Over 100 UK Local Authorities have 'pledged to secure the future for their communities by shifting to 100% clean energy by 2050.'³⁵

Legislation to support the local community energy sector is emerging with the Local Electricity Bill making encouraging progress on 14th October 2020. An extremely well-attended House of Commons 'Adjournment Debate' demonstrated strong cross-party support and enthusiasm for the Bill. Power for People explains: 'the rules that govern our energy system were devised in the 1990s and are, as the Energy Minister agreed on Wednesday night, no longer fit-for-purpose. By reforming these rules and

²⁷ https://www.c40.org/case_studies/freiburg-an-inspirational-city-powered-by-solar-where-a-third-of-all-journeys-are-by-bike

²⁸ <https://www.passivhaustrust.org.uk/guidance.php>

²⁹ <https://www.leti.london/ecp>

³⁰ <https://www.architecture.com/about/policy/climate-action/2030-climate-challenge/> Further resources from the "Architects Declare" has reached 1000 signatures (13.10.20) <https://www.architectsdeclare.com/>

³¹ https://www.ukgbc.org/wp-content/uploads/2020/09/Building-the-Case-for-Net-Zero_UKGBC.pdf

³² <https://www.ons.gov.uk/economy/environmentalaccounts/articles/netzeroandthedifferentofficialmeasuresoftheuksgreenhousegasemissions/2019-07-24>

³³ <https://www.iea.org/news/world-energy-outlook-2020-shows-how-the-response-to-the-covid-crisis-can-reshape-the-future-of-energy>

³⁴ <https://ec.europa.eu/jrc/en/news/nearly-zero-energy-buildings-net-zero-energy-districts>

³⁵ Over 100 Local Authorities have "pledged to secure the future for their communities by shifting to 100% clean energy by 2050."

creating a right to local supply, the Local Electricity Bill would unlock the potential for towns, villages and cities everywhere to have renewable energy generation - owned by communities and for the benefit of communities'.³⁶ This is what the Eynsham's community wants and can achieve.

6. Healthy Place Shaping

Introduction

There is evidence that the AAP has attempted to use the Garden City principles in the Healthy Place Shaping core theme as well as relevant national and international policy, principles and research.

17/07

The introduction to Healthy Place Shaping emphasises the garden city requirement to design Salt Cross as a 'beautiful, healthy and social community'. It demonstrates that such a requirement is a strategic priority for Oxfordshire (6.5) and that it should be embedded in the planning process. Documented challenges to shaping a healthy place are set out (6.6.) and a new policy for healthy place shaping is being developed in the Oxfordshire Plan 2050 which is likely to establish countywide standards in 2021. In the meantime, the garden village will be based on national current best practice and guidance. It has been assessed against local health challenges, Oxfordshire context/good practice and consultation feedback. This assessment resulted in the Checklist of 10 Healthy Place Shaping Key Principles at Salt Cross (Fig 6.1) upon which this core theme is founded. (It is also relevant to other core themes). This needs to be made clear in the pre-amble as it is confusing because the text around each policy box doesn't necessarily refer to that particular policy box.

We are satisfied that the Healthy Place Shaping core objectives and policies are largely sound. We show why so we would be able to support them, identify areas we consider need improvement and make suggestions for improvement.

Policy 4 - Adopting Healthy Place Shaping Principles

Policy 4 is justified by sound local evidence (community engagement), as well as appropriate national studies and policies. As we recognise the contributions of EPIC and GreenTEA in the local evidence presented and consider the way the Checklist of Key Principles was created is sound, we conclude that Policy 4 is justified. One of the areas needing improvement relates to the fundamentally flawed objectivity on the area's assessed needs in relation to transport infrastructure development. We regard this policy as not fully effective because a high level of air pollution along the A40 is still outstanding. For Policy 4 to be fully effective, joint working with Oxfordshire County Council is necessary to reduce air pollution levels along the A40³⁷ by the time the first residents move in. Also diminishing effectiveness is the omission, in the key outputs at Salt Cross section (p.7), of a recognition of the relationship between green and wild space with physical, mental and emotional health of current and future residents and workers. Absent also, given our Climate and Ecological Emergency and risk of pandemics is becoming

17/08

³⁶ <https://powerforpeople.org.uk/> 16 October 2020. UK 100: <https://www.uk100.org/our-members/> includes Oxford but no Oxfordshire districts

³⁷ p54: In relation to the key public health indicators about air pollution, it is stated in this document that 'This causes more harm than smoking and is linked to asthma, heart disease and stroke. Transport is now the largest source of carbon emissions in Oxfordshire'. Given that Salt Cross is located on the A40 (the busiest and most congested road in the county) along the entire length of its southern boundary, it is strange that the check list in Figure 6.1 (p.55-56), does not address the challenge of air pollution caused by transport on the A40 or in the village itself. This is in sharp contrast to the newly announced scheme in York (<https://www.theguardian.com/artanddesign/2020/oct/04/everest-zero-carbon-inside-yorks-green-home-revolution>) where 'Cars will be banished to the very corners of the sites, so the streets can be devoted entirely to people and play spaces.' Such an arrangement for each neighbourhood is surely an effective way to cut air pollution. Policy 11 requires an air quality assessment for the Outline Planning Application (this is included in Grosvenor's Environmental Statement)

more urgent and frequent, health and well-being will need to be considered carefully throughout the AAP. Homeworking is included in Policy 19, but there are no targets or measurements included.

We welcome your inclusion of shared public space for home-workers to meet for support and sharing of knowledge and expertise (6.25), so we think you might like to consider an even more radical approach to the public realm³⁸ in the village centre, features of which already exist in Eynsham and make the village so healthy and life-affirming, as well as reducing our carbon footprint.

Policy 5 - Social Integration, Interaction and Inclusion

This policy is concerned with the aspiration to create a new place where those who live and work there feel part of a 'strong, vibrant, connected and inclusive community' (6.14). Creating the infrastructure for such a community fosters 'an environment that achieves good mental health and wellbeing by reducing social isolation and loneliness and encouraging opportunities for social interaction'. Such infrastructure includes community hubs and community partnerships.

17/09

The aspiration of creating a safe environment that fosters social interaction and community partnership, is supported by NHS England (6.20) and the Eynsham Neighbourhood Plan (6.18). This follows NPPF advice for co-produced community development strategies related to the public realm and cultural well-being. It draws on the Royal Town Planning Institute on how to create dementia-friendly spaces. In addition, Oxfordshire County Council's Street Design Guide will be used. Safety in the public and private realm and crime prevention is to be considered from the outset and the policy draws on the proven Secured by Design police initiative. Provision of a funded community development officer at an early stage is welcome. This policy is considered sound on all counts.

Policy 6 - Providing Opportunities for Healthy Active Play, Leisure and Lifestyles

Policy 6 could meet the area's objectively assessed needs for leisure and sport facilities when the new studies for West Oxfordshire are completed and considered to be robust. There is also an intention to complement 'existing nearby provision'.

17/10

Active Design principles (6.32), developed by Public Health England in collaboration with Sport England, are proposed to enable social integration, interaction and inclusion for people of all ages through well designed, multi-functional communal facilities and open spaces, green infrastructure, communal sports facilities, play spaces, green spaces, trees and woodland. The Director of Public Health for Oxfordshire is cited as recognising the positive impact of exercise on mental and physical health especially in open and natural space with trees, woodland and bird song (6.28). Play design principles, set out by Play England, underpin successful play spaces that include the principle of using natural elements and are close to nature. Both sets of principles accord with evidence from the local community gathered during the development of the Eynsham Neighbourhood Plan and from international research on the positive effect of being in Nature on human health and well-being. We consider the use of these principles therefore as an appropriate strategy for implementing this Policy and conclude that it is sound.

Minor suggestions-Policy 6

p.51 *Core Objective GV6*, health also includes work-related design and opportunities, so we suggest adding to this core objective as follows (in bold):

*To promote healthy and active lifestyles through the provision of generous, high quality green space, safe and convenient opportunities for active travel, the provision of **work**, sports, and recreational facilities and an integrated approach to the location of housing, **work** and economic uses and community/cultural facilities and services.*

³⁸ <https://www.bioregional.com/news-and-opinion/re-imagining-our-high-streets>

p.52 6.2 In addition in the *Introduction*: The places we live and work – the built, natural and social environment – have a profound impact on our health and well-being.
Policy 6 –add ‘accessible for Active Travel’.

Policy 7 - Green Infrastructure

Overall, we consider Policy 7 to be sound. In terms of assessed need, we are not sure whether the LUC report included this assessment, but there is evidence that the policy has used the Eynsham Neighbourhood Plan, for which there was a very robust community engagement, as well as WODC’s own engagement with communities surrounding Salt Cross.

17/11

The policy is consistent with national (e.g., National Policy Planning Framework - 6.36) and international (e.g., World Health Organisation - 6.37) thinking on the importance of delivering environmental and life benefits to local communities (including health and well-being). Green infrastructure is defined as a network of multi-functional green space. Highlighted by the Climate Emergency and COVID-19 pandemic, the importance of this space in creating resilience to extreme environmental events by offering carbon sinks and improving air quality is stressed. It is also recognised that there is a growing body of evidence that supports the positive and measurable impacts of green infrastructure on health and well-being. This was pointed out by EPIC in their 2019 AAP consultation response which suggests that they have listened to our community.

Salt Cross is intended to be an ‘exemplar’ development, so the provision of innovative green infrastructure of the highest quality possible is proposed. We welcome the explicit intention to move away from traditional, ‘grey’ approaches to urban community space and moving towards working in harmony with Nature and the landscape. We are also pleased to see a framework of principles, proposed for the delivery of quality, multifunctional benefits for people and Nature and conditions for flourishing communities. These principles were devised by Building with Nature by bringing together existing guidance and good practice. It is proposed that quality will be measured using the Building with Nature standards (i.e., Well-being, Water and Wildlife -6.44-48), within their accreditation process. We also approve the requirement for Building with Nature’s ‘Excellent’ Award Accreditation and the generation of a comprehensive Community Management and Maintenance Plan.

Given that WODC have persisted with the development of this site, it does appear, in relation to the creation of green infrastructure, that they have listened to EPIC. Here is what we said back in 2018.

‘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 ... 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 (EPIC’s consultation response to the WODC’s Issues Paper 2018).

In addition to our concerns raised in the Core Theme, ‘Protecting and enhancing environmental assets’ and in the context of us seeing the value of creating woodlands on the southern boundary of the site to absorb sound and air pollution particulates from traffic on the A40, we cannot imagine that these strips of land along the A40, designated as parkland, will be pleasant for recreational purposes. While the mention of historic designed parks at Blenheim and Eynsham Hall give wider context, it is important that the site’s traditional rural landscape character of fields, hedgerows and trees is retained and tree planting reinforced as included in Policy 7. We also note that historical and cultural landscape references do not include the recent archaeological remains discovered on the south of the site.

On the other hand, we strongly support new woodland creation and scrub (6.55), the multi-functional role of green infrastructure (6.61), biodiversity (6.62) and intention to conserve and reflect local history (6.63). We also welcome the walkable green corridors and connected networks of pathways and cycleways providing direct and safe routes to key amenities and destinations within the village and surrounding countryside and villages, so that the residents of other villages can also enjoy the amenities of Salt Cross (6.64 -67).

Finally, potential for new woodland creation as a source of renewable low carbon fuel is questionable given the zero carbon aspirations of this development and WODC's declared Climate and Ecological Emergency (See Defra 2017³⁹). Burning wood in a biomass furnace or log burner potentially emits as much, if not more, deadly air pollution, than burning fossil fuels. In addition, it is now widely recognised that dead trees provide nourishment for young saplings and habitats for insects and mammals.

17/11
cont.

We welcome the recommendation for a tree nursery on site and advance tree planting (6.76). This is in tune with the original Garden Cities and would be an opportunity for community engagement at an early stage, e.g., gathering and planting acorns to grow. We hope that steps are taken so that this is more than a recommendation. We also welcome the requirement for community orchards (Table 6.1) and reference to Eynsham's apple heritage and community activity (6.90). We anticipate that such measures are taken forward in the required Community Management and Maintenance Plan (CMMP) required under Policy 31. We also support Policy 7's requirement for 'An ambitious approach to green and blue infrastructure' as climate sensitive urban design using vegetation and water is good for heat mitigation and sequestration.

Whilst we do think this Policy goes some way towards reducing the inevitable, negative consequences of choosing this site due to biodiversity and A40 issues, we conclude that Policy 7 requires minor adjustment, strengthening and clarification.

Suggestions - Policy 7

However, the following suggestions **in bold** relating to measurement are made to improve Policy 7. A range of qualitative and quantitative tools and techniques will be used to assess green infrastructure proposals, but as with other policies in this section, there is no consideration of quality on delivery or over the many years to come (given that trees and hedgerows take time to grow). This weakness could be partially addressed in the general section, 'Measuring Progress' (p.6-8), by including a general statement about measuring the outcome of development on completion and 5 or more years later to determine quality and fitness for purpose. The measurement indicators (p.51) are too narrow. We suggest adding in the words in bold below. (See also section 12)

*How will we measure success? Indicators to include: Amount of green and **natural** space provided*

- *Types, **use, quality, variety, biodiversity** of different green space provided*
- *Levels/rates of healthy activity, **living and working***
- *Levels/rates of long-term limiting **physical and mental/emotional** illnesses*
- ***Organic food production locally and food miles***

Para 6.55 The aspiration for using new woodland for fuel should be removed completely from the AAP (also p 32, Climate action – at a glance; p253 Opportunities for Salt Cross).

Policy 8 – Enabling Healthy Local Food Choices

This policy draws on evidence reported by the British Medical Association that poor diet, lack of physical exercise and social isolation are major causes of avoidable ill-health. It also makes the link between

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³⁹ https://ukair.defra.gov.uk/assets/documents/reports/cat11/1708081027_170807_AQEG_Biomass_report.pdf

enabling people to eat a balanced and healthy diet by ensuring proximity and easy access to affordable, local, healthy food. Thus, the strong community evidence from the Eynsham Neighbourhood Plan and the WODC engagement has been well used and our suggestions of provision of new community growing spaces, have been included with suggestions like balconies, roof tops, raised beds, community gardens and orchards although requirements for dispersed community growing spaces need to be strengthened. In addition, the likely impact of climate change on food production and supply will result in higher food prices. This means that providing space for residents of the GV to grow their own food is extremely important.

Our culture of food growing in Eynsham is given as an example of what could be aspired towards in Salt Cross. It is stated that further consideration will need to be given to the location, design, aspect, lay out and long-term management needs of these spaces. It is recommended that a food strategy should accompany the Outline Planning Application to include a diversity of food outlets and incorporating edible plants and small community growing spaces in the public domain, as seen at Welwyn Garden City and supported by TCPA guidance.⁴⁰ Our suggestion for schools to co-locate with food production has also been taken up. As with Policy 7, Policy 8 requires the demonstration and achievement of high quality through the Building with Nature standards with an 'Excellent' Award Accreditation.

Policy 8 is therefore considered sound as long as the Food Strategy takes account of the ideas in this section and is assessed rigorously. (NB. this is a general point where extra studies are required.)

Suggestion - Policy 8

'Opportunities for food growing include the provision of allotments, a community farm/orchard and the use of edible plants and flowers within the public realm' add 'dispersed community growing spaces'

7. Protecting and enhancing environmental assets

This is a challenging topic as there is evidence that the site is already unusually biodiverse and benefits from long standing organic management and special qualities such as large ancient hedgerows, abundant birdlife with rare and vulnerable ground nesting birds, highly significant arable plants, habitat for hares, deer etc. Humans are not privileged as the only living beings who own Salt Cross. The area has been 'owned' by trees, flowers, fruits, nuts and all sorts of bird, e.g. yellow-hammers, once-common but increasingly rare creatures and plants. Essential we restore and enhance nature. Otherwise the huge environmental costs and emissions of building Salt Cross will be contributing to global warming and the demise of the diverse life forms which are co-dependent with us.

17/13

Policy 9 – Biodiversity Net Gain, GV12 - To provide measurable net gains for biodiversity and enhancements to natural capital

Within the context of development, generally speaking, what the AAP has to say about biodiversity is encouraging. The 25% net gain target is very welcome, as long as it can be enforced and not allowed to drift as time goes by. In paragraph 7.65, the list of 19 measures that are part of the biodiversity net gain strategy are good and all the ones that are appropriate for the area should be fully implemented. It will be crucial to check compliance when reviewing the required Biodiversity Net Gain Strategy against Biodiversity Net Gain: Good Practice Principles for Development' and the subsequent Part A: A Practical Guide (2019) (7.52).

17/14

⁴⁰ TCPA Guide 10: 'Edible' Garden Cities (2019) There are 13 TCPA guides for garden communities.

In addition, WODC needs to bear in mind the consequences for offsite net gain of a new quarry east of Eynsham (SG20b), if the County Council chooses this option.

References to the Nature Recovery Network (NRN) are welcome as well as the fact the site is in a 'recovery zone'. The AAP does not mention the Eynsham's thriving and expanding Nature Recovery Network ⁴¹which is very active in projects in the area (although Long Mead LWS is mentioned in 7.72) and has worked with Trust for Oxfordshire's Environment (TOE). It is ironic that the Salt Cross development will greatly reduce the amount of land available for nature recovery. We have reached the stage of human evolution when nature recovery should take precedence over economic growth. Furthermore, paragraph 7.144 of the AAP seems to pave the way for further expansion in future to the north and east, which would severely damage the NRN and the wider area's biodiversity, habitat and wildlife connectivity. We also There should be no further expansion of the garden village beyond the currently envisaged boundary in the outline planning application and it is essential that surrounding open space, the proposed country park and nature reserves are protected from development and that the most sensitive areas are protected from human disturbance.

Yes, please ensure developers use, and pay for, the Trust for Oxfordshire's Environment (TOE) to deliver the biodiversity net gain rather than doing it themselves (**paragraph 7.75 and Policy 9, paragraph 7**). Currently TOE accepts funds for biodiversity net gain from developers. TOE, takes on the responsibility to create effective long term biodiversity projects to ensure biodiversity units are delivered in priority areas, in a transparent, joined up way. It is important that the net gain funds are spent strategically at the landscape scale, rather than through a piecemeal approach, plot by plot. We also trust that any offsetting will replace the important biodiversity which will be damaged or lost on the site.. For instance we note that the recent Arable Plant Survey (for Grosvenor) identified the site as a whole as of European importance for arable plants. At best after development there will be small and isolated arable planting mitigation areas so we suggest there needs to be meaningful local compensation. The large hedges attracts flocks of yellowhammers and skylarks are a familiar sight and sound; but the hedges will be cut through, habitats will be disturbed and many birds will almost certainly be displaced. As the negative impacts are in our area, we would expect any offsite enhancements to be within Eynsham parish and as close as possible to the site.

17/14
cont.

On the site itself, the plans for nature reserves are welcome, and advance planting is a must – as much as possible, please. It should be used as a mechanism for creating facts on the ground that will prevent incursions from the built environment at the 'reserved matters' stage.

The proposal for linear woods, in particular one linking Eynsham Wood with Vincent Wood, is welcome. The treatment of hedgerows is not so encouraging. While Policy 7 Green Infrastructure mentions the network of hedgerows, there will be many interruptions by roads (and other development) of the green infrastructure, of which large mature hedgerows are arguably irreplaceable and form a notable and distinctive feature on this site and provide essential connectivity. Very careful planting and maintenance will be needed to retain or create new hedgerows that link different biodiversity areas, to give a safe movement corridors for wildlife. Much care is needed for subsequent maintenance, pruning, planting into gaps etc to develop a thick wedge of vegetation that will protect wildlife. The development could well break the law by removing well-established hedgerows of historical significance, which cannot be easily replaced by new planting, and by leaving lasting gaps in connectivity. The spine road is a calamity in this regard.

Paragraphs 3.20 (bullet 6) and 7.119 -7.121

The irreversible loss of Grade 2 and 3a best and most versatile agricultural (BMV) land is an unacknowledged disaster, particularly in relation to non-intensive, nature-friendly farming. It might be

⁴¹ <https://eynsham-pc.gov.uk/org.aspx?n=Eynshams-Local-Nature-Recovery-Network>

argued that to lose just a little of this national resource is acceptable, but in the long term, every acre counts.

Suggestions- Policy 9

Policy 9 is well justified, but will only be effective with rigorous monitoring and scrutiny of developers' reports; protection of vulnerable areas and nature reserves from further development and human impact; proper co-ordination and use of local skills (TOE, Eynsham's Nature Recovery Network rather than an off-site delivery provider); advance tree planting; better protection and enhancement of hedgerows: the amount of hedgerow (2.6 kms) that will be removed appears illegal– enough to stretch unbroken from Millennium Wood to Church Hanborough – with remaining hedgerow repeatedly interrupted (Hedgerows Regulations 1997 and not reflecting the NPPF): and review of the impact on and appropriate use of best and most versatile agricultural land in any planning application, with reference to paragraphs 7.119 -7.121 and specific inclusion of this in Policy 11.

17/14
cont.

We suggest that these measures are detailed under the requirement for a Biodiversity Mitigation, Compensation, Monitoring and Management Framework and added into Section 12 to ensure compliance. This should also contain a commitment to being pesticide free during construction and future management .

We suggest that the requirement for off-site biodiversity net gain should state *An appropriate financial payment will be sought by the District Council for the delivery of off-site biodiversity net gain (via the Trust for Oxfordshire's Environment (TOE)...* and **ADD 'delivery of Eynsham's Nature Recovery Network.....within the Eynsham area'** and that this sum would be spent strategically at the landscape scale rather than a piecemeal approach.

Policy 10 – Water environment

GV14 - To ensure that any flood risk mitigation including surface water drainage is effective

Paragraph 5.18 (bullet 1)

7.90 says built development will only take place within Flood Zone 1 yet the risk of flooding in the east of the site continues to be underplayed in the AAP, as does the likelihood of increasingly severe water stress in the wider area – both as a result of climate change. Extremes are an increasing risk, as highlighted by a Met Office Report on 22 October 2020; regular review against latest data and projections will be essential.⁴²

17/15

Suggestion- Policy 10

The aims of this policy are good, but to be effective, rigorous implementation of Policy 10's requirement for a flood risk assessment, robust scrutiny of the assessment and regular review against latest data and projections throughout the project will be crucial.

Policy 11 – Environmental assets GV13 - To avoid harmful light and noise pollution on local amenity, landscape character and biodiversity conservation.

GV15 To ensure that development of the garden village seeks to minimise and properly mitigate any potentially harmful impacts on air, soil and water quality.

17/16

The AAP correctly identifies local concern about air quality, noise and light pollution as well as the issue of contaminated land. Air quality will only improve if road-based transport decreases and use of fossil fuels is drastically reduced. Given the pressure on the A40 from existing use, large scale new development and Oxfordshire CC's plan to increase road-space, air quality is likely to worsen rather than improve.

⁴² <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/sukb-2020-updates>

Suggestions- Policy 11

We suggest that to be effective this policy needs to require all studies to assess impacts on existing residents on and around the site and in Eynsham; to include protection of best and most versatile agricultural land (as above); an air quality assessment which includes the local Eynsham area over the period of the development; and a lighting strategy to ensure dark skies valued by local astronomers (e.g., a period when street lights are off) and essential to bats and other species.

Policy 12 – Conserving and enhancing the historic environment of Salt Cross GV16

To fully address and capitalise on the constraints and opportunities presented by heritage assets including the listed buildings at City Farm and the suspected site of the former medieval village of Tilgarsley. The requirement for a Conservation Management Plan is welcome.

17/17

Suggestions- Policy 12

Please note that the presence of the lost medieval village of Tilgarsley is confirmed, not just “suspected” (GV16, 7.134, 7.145) and therefore deserves thorough research and preservation. There is no mention in the AAP of a possible Roman site near the A40, which would also require archaeological attention. In addition, the site’s Green Infrastructure- its pattern of fields, settlements, hedgerows and ancient trackways- is part of the heritage and should be included. In Cultural heritage includes the rural, farming and woodland landscape with nearby Pinsey and Vincent bluebell woods and the legacy of ancient and medieval settlements in this part of West Oxfordshire which create a strong and locally rooted sense of place.

8. Movement and connectivity

The policies in this core theme are soundly based and part of an integrated design for “place making” and addressing Climate Change (Garden Village Principles 5, 8 and 9 and, specifically, Policy 13). Consistent priority is given to people (amongst others, Policy 13), active travel (walking and cycling in Policy 14) and public transport (Policy 15), rather than car travel (Policy 16). Provisional figures from the Department for Business Energy and Industrial Strategy issued in June 2020 show that UK transport remains the largest source of greenhouse gas emissions at just under 28 per cent (excluding shipping and aviation and the carbon embodied in imported products) and unlike other sectors such as energy, emissions are hardly falling.⁴³ Therefore the overall strategy of reducing the need for travel, and particularly private vehicles, is sound, as is the support for electric vehicles. The policies are intrinsically sound and consistent and, with a few exceptions noted below, should be supported. We note that Bioregional report’s suggestion to ‘*Consider using carbon offset payments (s106 and/or community infrastructure levy) to enact credible schemes to reduce transport carbon.*’ has not been included in the AAP. Reduction in emissions at source and demand management are the highest priority, but it must be acknowledged that there will be residual emissions. There are conflicting views on offsetting but guidance is available on effective offsetting where all other means have been exhausted. As with all emissions, measurement is key.⁴⁴

17/18

The layout and networks of the Garden Village should be designed to be walkable and accessible (Garden Village Core Objectives 17 and 18) and this requires key services and facilities to be within a ten minute walk from homes; an important policy objective and one of the key criteria in the Eynsham Neighbourhood Plan. We welcome the walkable green corridors and connected networks of pathways and cycleways providing direct and safe routes to key amenities and destinations within the village and surrounding countryside and villages, so that the residents of other villages can also enjoy the amenities

⁴³ <https://data.gov.uk/dataset/9a1e58e5-d1b6-457d-a414-335ca546d52c/provisional-uk-greenhouse-gas-emissions-national-statistics>

⁴⁴ Oxford offsetting principles <https://www.smithschool.ox.ac.uk/publications/reports/Oxford-Offsetting-Principles-2020.pdf>
Measure- reduce- offset residual Accreditation by eg Verra/Gold Standard (James White Climate Care).

of Salt Cross (6.64 -67); also the provision of cycle parking and relatively low on plot parking provision (Policy 16). We suggest that this measure should be progressive over time.

Policy 16 has a requirement for 'areas of the site that will be car free development (minimum 15% of total dwellings)' [ie c.300]. This is welcome but an exemplary scheme with climate change at its core could go further; innovation, flexibility and good design will be key. Leeds is planning to build 600 Passivhaus social homes in an exemplary car free neighbourhood.⁴⁵ Bedzed and Lancaster Cohousing Project were early exemplary car free developments.⁴⁶ Yet recent garden villages have a bad record on car dependence. A recent Transport for New homes report stated that the 20 Garden Communities that they looked at would create up to 200,000 car-dependent households.⁴⁷ We need Salt Cross to buck the trend.

17/19

West Oxfordshire currently has very poor EV charging infrastructure and we support charging points in public areas (non-allocated spaces) to increase equability and flexibility of use.⁴⁸

We welcome the proposals for travel demand management (8.47 and Policy 16) including appointment of a Travel Plan Co-ordinator and that Policy 16 requires that '*measures should be implemented to encourage sustainable travel, including car sharing*' and that measures '*should include residents of Eynsham Village and the West Eynsham Strategic Development Area.*' We trust that these will be fully followed through, perhaps under the community management model.

Nevertheless, a settlement of this size will inevitably affect Eynsham, the A40 and local roads. The traffic model shows that the Garden Village would affect the A40 and local roads (8.58) unless A40 Improvements (Policy 15 and 17 for, among others, an 850 car Park and Ride and east and west bus lanes to and from Oxford) as well as, Travel Plans (Travel Demand Management in Policy 16) could persuade sufficient people to switch from their cars to public transport (improved bus and Hanborough railway service, Policy 15) or Active Travel (walking and cycling, Policy 14).

How successful would these measures be? Would A40 congestion get noticeably worse? This risk is probably understood because there is a specific caveat in Policy 17 that links planning permission for development to A40 congestion. How this would be measured or enforced needs to be determined. (Policy 17: *Permission for development will only be granted where the Council is satisfied that the impact on the local and strategic road network and density of the development would be acceptable and does not compromise the delivery and benefits of the A40 Corridor improvements*).

The Garden Village road network would be designed to encourage residents to walk, cycle or drive to and from the eastern employment area, thereby avoiding use of the A40 (Policy 15).

A Spine Road is proposed between a new A40 roundabout at Cuckoo Lane, across the village to a new junction on Lower Road (Policy 15). The AAP also wants Garden Village roads designed to prevent "rat running" (Figure 8.1, Connectivity within the Garden Village). The new bus service would also have to run through the Garden Village (Figure 8.1). How can these be squared? The inherent tension between these measures is acknowledged in Policy 17 where future bisecting of the Spine Road is considered.

Policy 14 proposes, among others, connections to Eynsham via a cycling and walking underpass at Old Witney Road, an improved crossing at the Witney Road junction and two signalised crossings across the A40 to the east. Although these proposed connections are the result of a feasibility study of options

17/20

⁴⁵ <https://www.theguardian.com/artanddesign/2020/oct/04/everest-zero-carbon-inside-yorks-green-home-revolution> 'The city plans to build Britain's biggest zero-carbon housing project, boasting 600 homes in car-free cycling paradises full of fruit trees and allotments. When will the rest of the UK catch up?'

⁴⁶ <https://www.lowenergybuildings.org.uk/viewproject.php?id=325>

⁴⁷ *Garden Villages and Garden Towns: Visions and Reality* <https://www.transportfornewhomes.org.uk/the-project/garden-villages-and-garden-towns/>

⁴⁸ <http://maps.dft.gov.uk/ev-charging-map/> West Oxfordshire is in the bottom 40% of available chargers across the country, with only 19 charging devices per 100,000 population

(8.14-8.17), would they be sufficiently convenient for residents of the two settlements, and would they minimise car travel and encourage walking and cycling (to and from Bartholomew School for instance)? As many will know, the A40 Improvements, new roundabouts and connections to Eynsham are the responsibility of the County Council as highway authority and not West Oxfordshire District Council as the planning authority. They have different procedures from the Garden Village proposal. However, the developer will be expected to help fund, among other requirements, these network proposals, crossings, the B4044 community path (Policy 14) the cycle and footpath link to Hanborough Station (Policy 17) and garden village designers should influence their design so that crossings are safe and effective for users including school students and other pedestrians, cyclists, horse riders and the disabled; some uses are incompatible with crossings broken by a small central refuge. Our cyclist members are very concerned that the proposed new signalised crossing near Lower Road (road to Hanborough) will be an inadequate cycling link between the B4044 community path, Salt Cross and the cycle route to the railway station. The underpass is inconvenient, distant from this key route and a second grade separated crossing near the roundabout would be preferable. We note that both the underpass and the bridge near Lower Road scored well in the Mott Macdonald report on A40 crossings, but that OCC chose the underpass option.⁴⁹ Unfortunately this is not the most convenient for pedestrians (including students) or horses, who would naturally cross at Old Witney Road to the Salt Way), nor cyclists from the B4044 path and Eynsham travelling to Hanborough station, as noted in the Mott Macdonald report. Nor will it deliver the desired visual impact or add to the sense of place in the expanded Eynsham, required in 8.38 *Best practice place-making principles must be embedded within the planning and design....* It is therefore essential that if these crossings are signalised, at-grade crossings, they should be well designed, attractive, safe and convenient and add to the sense of place, rather than allowing road transport to dominate. Central refuges must be generous enough to suit all users with sufficient space/width on a safe central island and good approach paths for pedestrians and cyclists. Well designed, attractive and safe design also applies to the underpass. Overall, many think that the County's A40 proposals are inadequate to promote the needed modal shift and some have been pressing for a tram/light railway along the A40.

Suggestions to improve effectiveness - Policy 13

Policy 13 *'Ease of movement: All areas of the Garden Village must be easy to get to and move through for all, and encourage physical activity.'* **add** but vehicle routes should be designed to avoid creating attractive rat runs. Figure 8.1 – Movement and Connectivity Strategy – Key overarching principles. Connectivity within the GV: **add** "walkability" (see above and Neighbourhood Plan) as a key criterion.

Suggestions to improve effectiveness - Policy 14

Policy 14: Pedestrian and cycle crossings on A40; **add** 'of high quality design in terms of surface and detailing to provide well designed, attractive, safe and convenient crossings, wide enough for users including school students and other pedestrians, cyclists, horse riders and the disabled; to link cycle routes, to encourage active travel over driving and to create a sense of place. Existing footpaths should be protected and expanded, keeping their width for people's exercise and enjoyment while protecting and supporting trees and all nature.

Policy 14: Spine road: there is potential conflict between a network design discouraging A 40 use by residents and preventing "rat running" (Bullet points two and three). There must be a through bus route but the spine road proposal needs better explanation and practical design measures to prevent rat running. If practically impossible, bisection of the Spine Road should be implemented at the outset.

Add to this para: crossings for pedestrians and cycles to be surfaced and detailed to reduce perceived road priority.

Policy 14: **add the following:** Hanborough link funded by developer (or cross refer to later provision in the AAP), school travel plan (Policy 16), 30 mph speed limit on A40 next to GV (the 50mph proposed is much too fast), proposed Western Eynsham Extension and Park and Ride.

⁴⁹ Non-motorised crossings of the A40 at Eynsham", Mott Macdonald, April 2020
<https://www.westoxon.gov.uk/media/jvbi1bg2/a40-eynsham-crossings-report.pdf>

Suggestions to improve effectiveness - Policy 16

Policy 16 Travel Demand Management. **Add** requirement for initiatives to be supported by a Travel Plan Co-ordinator.

Suggestions to improve effectiveness - Policy 17

Policy 17 needs (and monitoring page 232) to set out a method to measure impact of the development on surrounding roads otherwise the clause that *'Permission for development will only be granted where the Council is satisfied that the impact on the local and strategic road network and density of the development would be acceptable and does not compromise the delivery and benefits of the A40 Corridor improvements'* cannot be implemented.

Policy 17: Additional Highway Infrastructure, see Spine Road comments above.

"Triggers and a long stop" are confusing and should be explained, as should "Change in priority on Cuckoo Lane" and "junction improvement at Pear Tree roundabout".

8.46 The section could include reference to the Project LEO Smart and Fair decentralised grid project in the Eynsham area and proposed Smart Energy Hub (see also comments under Policy 2).

Suggestions for measurements of success (p127) and Section 12 monitoring to include

(Policy 13 page 229) **add** accidents on the internal road and path network and connections to the external highway network;

(Policy 16 page 231) **add** area of car free spaces (satisfying and exceeding Policy requirement) and proportion of dwellings without dedicated off street parking; **add** number of EV charging points in public areas

(Policy 16) : **add** annual review to increase requirement for car free areas and reduction in plots with off street parking as behaviour changes.

(Policy 16) : **add** use of car clubs, car share and bike hire.

(Policy 16) : **add** use of car clubs, car share and bike hire.

Other evidence

Cambridge has just announced £32.5m greenway routes for cycling and walking between Cambridge and villages approved by Greater Cambridge Partnership: this is what is needed here, Oxford is lagging behind.⁵⁰ 17/21

Utrecht is planning a car free neighbourhood for 12,000 people. *'The new-build Merwede district of 6,000 homes is expected to be serviced by about 20,000 bicycles. Underground garages alongside the "logistical roads" will offer 1,800 parking spaces for those who cannot quit their addiction to the car, equating to one car for every three households. Broekman said he and his collaborators had been inspired by smaller-scale projects in Paris and a 600-home development in Amsterdam's Gemeente Waterleiding district, but that he believed the scale of the project was unique....By having this car-free area, we can design spaces without the straitjacket rules of the car, and thus focus on essentials ...the quality of public space, ...green, biodiversity, climate adaptation and meeting places for social interaction.'* Merwede, a third of whose land is owned by the municipality with the rest belonging to private entities, follows the example of Vauban in Germany (a neighbourhood to the south of Freiburg) which is home to more than 5,000 people.

The Department for Transport (DfT) is fast tracking micro mobility devices and expanding trials of rental e-scooters. E-scooters were given access to roads from on 4 July 2020. The GV transport plan needs to be cognisant of this new form of active travel.⁵¹

⁵⁰ <https://www.cambridgeindependent.co.uk/news/the-32-5m-greenway-routes-for-cycling-and-walking-between-cambridge-and-villages-approved-by-gcp-9126900/> reported 17 October 2020

⁵¹ <https://www.gov.uk/government/news/2-billion-package-to-create-new-era-for-cycling-and-walking>
<https://www.gov.uk/government/publications/e-scooter-trials-guidance-for-local-areas-and-rental-operators/e-scooter-trials-guidance-for-local-areas-and-rental-operators#background>

See the update on the Government's Transport Decarbonisation Plan, released in March 2020, which has the following aims⁵²

- Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network.
- From motorcycles to HGVs, all road vehicles will be zero emission. Technological advances, including new modes of transport and mobility innovation, will change the way vehicles are used.
- Our goods will be delivered through an integrated, efficient and sustainable delivery system.
- Clean, place-based solutions will meet the needs of local people. Changes and leadership at a local level will make an important contribution to reducing national GHG emissions.
- The UK will be an internationally recognised leader in environmentally sustainable, low carbon technology and innovation in transport.

9. Enterprise, Innovation and Productivity

We support core objectives GV23-27 and related Policies (18 – 21) for enterprise, innovation and productivity. While the Science Park dominates this section, we welcome the proposals beyond the Science Park itself on broader employment opportunities which will provide services for the new population, as well as flexible workspaces and home-working provision. We appreciate and support the thought that has been given to the latter in response to the changing environment in which we find ourselves, due to the global pandemic and climate change and trust that the Policies are robust enough to be enforced.

17/22

We also support the high-level Garden Village Principle 5 of a balanced community of homes and accessible jobs with minimal commuting because of, amongst other things, its centrality for Place Making, addressing the Climate Emergency, a low carbon economy and reducing traffic growth on the A40. However, we are aware that research has shown that self-containment, though a desirable aim, is never achieved in reality and in and out commuting persists.

Garden Village Core Objectives 23 and 24 seek a balance of jobs and business spaces in the 40 ha/ 80,000m² science and technology park (Policy 18) that should help support the development of the wider economy (Garden Village Core Objective 25). Policy 18 links it with strong, sustainable transport link including the Sustainable Transport Hub (including the Park and Ride) and connections to Hanborough Station. Sensibly, not all employment should be in the business park (Policy 19 - Small-scale commercial opportunities and flexible business space). Dispersed, small-scale, commercial and flexible business spaces should be provided around the Neighbourhood Centres in suitable and accessible locations. Therefore, we strongly support both Policies 18 & 19 which reduce the propensity for car travel and attendant A40 congestion.

The science park would have its own ancillary facilities of shops, cafes, gyms, etc (Policy 18). Homeworking is given proper prominence with local facilities, fast broadband and dwelling design (Policy 20 Home working). This Policy states that 'Provision should be made as part of the overall mix of uses within any neighbourhood centre and meeting space linked to the science and technology park'. However, to be effective, this and Policy 19 need measurable targets against which fulfilment will be measured, including the key outputs of 'Creation of new community meeting spaces and facilities including opportunities for 'co-working' and 'high-proportion of home-working'. Examples of enterprise in Letchworth, Welwyn and Milton Keynes have long been 'workshop' and enterprise-based.

⁵²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878642/decarbonising-transport-setting-the-challenge.pdf

Possibly, the most interesting policy for Eynsham, apart from an enhanced local employment offer (Policy 18 and 19), is a commitment to training and preference for local labour and business (Policy 21), including a Community Employment plan which we support.

However, given the 'golden thread' of Climate Action in the AAP, we are very surprised that the words "zero" and "carbon" only appear once in this whole section (at 9.17). Since a systems approach is required to reach net zero carbon by 2050, we feel more references to this thread should have been made in this section, particularly as the Science Park alone has the potential to consume more energy than the whole residential portion of Salt Cross. (Nor is the Science Park mentioned in the Climate section (5)).

As well as keeping careful consideration of carbon emissions through energy use, we suggest that in pursuing the principles of a circular economy (Policy 3, GV4), WODC should oversee, or appoint a body to oversee, the recruitment of business tenants such that the theories of Industrial Ecology⁵³ can be put into practice wherever possible.

This oversight function would also address the continuity challenge suggested by sections 9.19-9.21 and could continue beyond "completion" to ensure that there is the required systems approach to achieving net zero carbon by, and beyond, 2050.

Suggestions- general

Add (and cross refer to) measures to achieve net zero and minimise climate impacts of activities on the site.

Suggestions-success indicators and Section 12

P 150 How will we measure success? Indicators to include: Add 'in and out' commuting, as an indicator of the balance of jobs and homes and the amount of the additional traffic generated on the A40 and local roads.

Suggestions - Policy 19 Small-scale commercial opportunities and flexible business space and policy 20 Home working

Add measurable targets against which fulfilment will be measured including the key outputs of '*Creation of new community meeting spaces and facilities including opportunities for 'co-working' and 'high-proportion of home-working'*' to provide dispersed employment, support for small businesses in each neighbourhood and homeworking. 17/23
17/24

Include these targets and method of measurement and review in **Section 12**.

Suggestions -Policy 21

We suggest the opportunity for onsite fabrication alongside training is added to the Policy 21 as a means of reducing emissions. For example at Leeds Innovation district homes will be manufactured at its purpose-built on-site factory.⁵⁴ 17/25

Other evidence

The university has given some of its building estate for community workspaces to Makespace Oxford.⁵⁵

⁵³ Industrial Ecology promotes design which intentionally locates businesses and buildings so that the waste products, including heat, of one business are used as raw materials for others. This mimics a natural system; biota have been optimising resource use and minimising waste, by necessity, since life first occurred.

⁵⁴ <https://southleedslife.com/citu-creating-climate-innovation-district-hunslet/>

⁵⁵ "The community works": <https://makespaceoxford.org/the-community-works/>

10. Meeting current and future housing needs

This section of the AAP is based on strong evidence from the Eynsham Neighbourhood Plan and subsequent consultations which show that what is needed and supported locally is a well-balanced mix of property types, tenures and sizes to meet a broad spectrum of housing needs. We welcome the target of 50% affordable housing and opportunities to rent and buy own their own homes but Eynsham residents are very concerned about the definition of affordability and feel that 80% of the market value in an area like this does not make housing genuinely within reach. It is of great concern that the target is 'subject to viability' so to ensure genuine affordability the target needs to be achieved with imagination and flexibility, building on best practice from across the country and backed up with tough enforcement measures.

17/26

The AAP appropriately recognises the evidence of need for social rented housing for single people and families and this should be recognised in the phasing of building, with targets for social rented housing in the early stages and a clear commitment to build for rent as well as shared ownership.

Policies 23, 25 and 26 build on evidence that identified smaller starter homes, houses for key workers and junior staff with local employers, and self build, co-housing and flexible arrangements for those with disabilities or who need live in care. Housing for those with care needs should be located centrally to enable integration into the community. There must now be a genuine attempt to reach out to identify and quantify these needs and set targets as without this there is a danger that the developers will say they do not have the evidence and will revert to standard provision. One gap appears to be any reference to space standards. The UK is building the smallest homes in Europe and we suggest reference to the well-received *NHF Housing Standards Handbook* (2016).⁵⁶

Given that Oxford's unmet housing need was a key driver in identifying this site there should be a genuine collaboration and a financial contribution from Oxford which would help address the questions raised by the developer about viability. Now that Oxford's growth targets have been scaled down these houses should be transferred to people on the housing list in West Oxfordshire.

Suggestions - Policy 22 and Policy 23

Add 'Tenure blind' to Policy 22 or 23 (only mentioned in policy 24). In Garden City terms, this means it must be people of difference living together: young and old; rich and poor; BAME and white.

Add space standards

Housing in a Garden Village

A key feature of a Garden Village is the recognition of the importance of, and shared access to green space and this was a key topic raised in the various local consultations in particular the importance of shared spaces as integral to the housing design and layout, not just as separate parks or recreation areas. Shared spaces for growing, play areas and trees need to be protected close to the housing in a way that encourages neighbourliness and community responsibility.

Co-housing, Self Build and Community Land Trusts

We are very pleased to see the commitment to self build and support for co-housing and as a way of meeting local need in Policy 25. We welcome the target of 110 self and custom-build opportunities distributed in small, attractive clusters across the garden village site, but see this as a minimum with further potential to be explored. We welcome the inclusion of affordable housing within this target and we trust that land will be allocated in a flexible way and will be available to groups as well as single plots for self and custom build.

17/27

⁵⁶ <https://www.architecture.com/riba-books/books/urban-design-planning-housing-and-infrastructure/planning/product/housing-standards-handbook-a-good-practice-guide-to-design-quality-for-affordable-housing-providers.html> The authors also worked on the Elementa zero carbon report and the LETI climate emergency design guide.

We are impressed with the WODC report on Community Land Trust Options⁵⁷ and are keen to explore these ideas further. As evidence of local interest a new group is now emerging supported by Collaborative Housing and this opportunity should be actively promoted by WODC to ensure delivery.

There are many advantages of setting up a Community Land Trust (CLT) both for smaller community led initiatives but also as a possible route to create the community ownership and governance consistent with Green Village principles for the site as a whole (see also Policy 31). A CLT would be one of the key ways to secure the commitment to the climate change objectives such as limited car parking, facilities of electric cars etc. It could also prevent subletting and Airbnb which constitute a real threat to community cohesion. We urge WODC to follow up on Policy 25 to explore options with community representatives and organisations.

We would support the development of community-led housing SPD.

Suggestion- Policy 25

We suggest that this policy makes provision for groups of self/custom builders, as well as individuals.

Additional evidence

There are increasing numbers of examples of CLTs delivering and managing high quality equitable housing. The CLT report highlights Kennett Garden Village, where the CLT is responsible for 500 homes.⁵⁸ East Cambridgeshire now has 10 CLTs, there is a CLT in the Leeds Innovation district and there are several CLTs in London.⁵⁹ The TCPA guides include one long term stewardship which covers the role of community land trusts.⁶⁰

An early example of co- housing, Lancaster Cohousing Project (registered in 2006) is a Passivhaus, car free affordable community housing project for 41 individual householders. Marmalade Lane in Cambridge is unusual in that it was developer led collective custom build development built by a developer who specialises in co-housing. It has 42 custom build homes shared facilities with shared garden, workshop common house and laundry.⁶¹

⁵⁷ Collaborative Housing, *Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village* June 2002

⁵⁸ Kennett Garden Village (Palace Green Homes)

⁵⁹ <https://www.londonclt.org/>

⁶⁰ <https://www.tcpa.org.uk/tcpa-pgs-guide-9-stewardship>

⁶¹ <https://www.molearchitects.co.uk/projects/housing/k1-cambridge-co-housing/>
<http://www.wearetown.co.uk/marmalade-lane> Town developers of Marmalade Lane and other co-housing schemes
<http://www.wearetown.co.uk/>.

11. Building a Strong, Vibrant and Sustainable Community

As with several other policy areas, the aspirations are good and reflect community feedback, but are often too vague and are not always measurable or enforceable. It was good to see Ebenezer Howard mentioned given the connection with Eynsham through his descendent who is a member of GreenTEA. 17/28

Policy 27 - Key development principles

This policy has laudable principles although it fails to address an issue of major concern to Eynsham residents, i.e., links to Eynsham. Salt Cross and the existing village of Eynsham will not be two distinct and separate villages. The plans must recognise the interdependency in terms of services, shops, jobs, transport, amenity and this needs to inform all the plans. The planned underpass at Witney Road is an unattractive and limited option and we continue to press for an attractive walking and cycling bridge at the eastern edge of the site. Salt cross will be vibrant if it is linked-in to the one of the most vibrant villages in West Oxfordshire. We feel strongly that the AAP Policies must rigorously analyse the impact on Eynsham of the GV and West Eynsham as one strategic area. We are to become an unacknowledged New Town. 17/29

Suggestions - Policy 27

Add a clause 'to take account of the cumulative impact of development and to complement Eynsham and build on its vibrant community'.

P126 (movement) correctly states that the community says '*Safe and convenient crossing of the A40 is critical to the successful integration of the garden village with Eynsham.*'

We note core objective GV17 *To reduce the overall need to travel outside of the Garden Village by providing a balanced and sustainable mix of uses within Salt Cross so that the majority of everyday needs of all people can be met locally.* This is what the existing settlement achieves so well and one of the reasons it is so successful. GV20 *To provide safe and convenient public transport and active travel connections within Salt Cross and the wider area, in particular to Eynsham, Hanborough Station and the open countryside...*

Policy 28 – Land uses and layout – the spatial framework and Policy 29 – Design requirements

Table 11.1 – Anticipated amount and mix of different land uses at Salt Cross.

This section mentions facilities we would support, such as smaller-scale employment space, a mixture of different community use, but these are 'to be determined at a later date through detailed/reserved matters.' While the Eynsham Area Infrastructure Delivery Plan identifies a potential need for around 385 m2 of floorspace for culture and the arts and around 1,056 m2 for community meeting space, these are not defined in Policy 28. 17/30

Figure 11.6 Illustrative Spatial Framework indicates the secondary school on high ground about a mile distant from Bartholomew which will inevitably lead to increased and damaging car use; the building would be prominent and require exceptional design. The plan does not show footpath connections to the east of the site.

Suggestions - Policy 28

Layout: We propose that Policy 28 should set aside minimum areas for community and cultural spaces- central gathering places for celebrating, protesting, entertaining, making music etc. , which should include support for home workers in each neighbourhood and ensure there are Public routes where traditions are made (Cross refer Policy 20).

To text 'Continuous green space around the northern fringe of the site in the form of a biodiverse Country Park to include a mixture of uses and activities including nature reserves and providing effective connections into adjacent countryside;' **ADD** 'on all sides of the site including footpaths to the east'.

Policy 28: 'The provision of a network of green corridors and spaces 'within' the main areas of development to complement the Country Park including the integration of the Salt Way and Saxon Way as a key component of the design and layout; **ADD** 'keeping their width for people's exercise and enjoyment while protecting and supporting trees and all nature'.

The wording on 'Effective and safe pedestrian and cycle connections' should explicitly mention links to Eynsham and core services such as education and health services.

The text 'Principal movement corridor/s to be designed so as to discourage unnecessary through traffic' **should include** 'and to give priority to other modes over car travel through surface and detailing'.

We support the related Policy 20 that the Salt Cross neighbourhood centres should include shared working spaces to support small enterprises and reduce the environmental, family and social costs of journeys to work and more rigour is needed to ensure this is achieved.

The location and design of the school needs further attention.

Policy 29 – Design Requirements

In the first point under design (11.46), the AAP recognises that locals want 'something more bold and innovative' than business as usual; we expect exceptional design in this exemplar Garden Village. Yet the Policy contains none of the measures needed to secure and assess this or 'overall continuity of design' mentioned in Policy 29. There is no mention of continuing Design Review, named architects or competitions. Such issues were key to securing design excellence at developments such as Eddington, Cambridge, with its impressive, innovative and award winning community building (Storey's Field Centre), which was visited during consultation.⁶² One of the measures of success on page 184 is design awards and surely the exemplar village of Salt Cross should aim to win awards- but we do not see the measures that will make this a real possibility. Key outputs (page 8) include 'A new primary school and a new secondary school intended as a 'satellite' for Bartholomew School in Eynsham, both forming key landmarks within the garden village through the use of high quality design and materials.' But how will this high quality be achieved through the OCC process?

17/31

We are also very surprised that there is no requirement for a Landscape and Visual Assessment (LVIA). Views are an essential part of our enjoyment of landscape character, and the development will have a major impact on many views within and beyond the site. The value of views are mentioned in Policies 7, 12 and 29, but there is no requirement to map them and assess impacts on them.

Suggestions- Policy 29

We strongly recommend **adding** a requirement to Policy 29 for continuity through design review, use of named architects and landscape architects and support for design competitions, including the design of the landmark schools.

Add requirement for a Landscape and Visual Assessment.

Policy 30 – Provision of supporting infrastructure

This is a top issue for the community. The Infrastructure Delivery Plan (IDP) is good but only a 'valuable starting point'(11.74) and a lot of further work is required. The AAP correctly notes that '...requirements identified in the IDP are a result of 'cumulative' growth in the Eynsham area' (11.70): indeed: this is one of the few documents that fully acknowledges this fact. We support the emphasis on place-making and

17/32

⁶² <https://eddington-cambridge.co.uk/news-and-updates/storeys-field-centre-double-win-at-aj-architecture-awards-2018>

timely provision. 'Timely' provision' is key. For example, foul drainage causes regular problems in Eynsham and we note that Thames Water has objected to the Outline Planning Application. The transport problems are well known and A40 works and crossings will be needed at an early stage. We note *'Appropriate mechanisms including the use of planning obligations and planning conditions will be used to secure an appropriate package of improvements for the long-term benefit of the local community'* and are concerned that Eynsham Parish, and the inevitable burden on the existing community and infrastructure should be adequately supported in the absence of CIL payments.

Suggestion- Policy 31

Addto compensate Eynsham Parish in dealing with and the inevitable burden on the existing community and infrastructure.

Policy 31 – Long-term maintenance and stewardship

This is a crucial issue and central to the Garden Cities and garden village vision. Yet although good examples are given the Policy is broad and imprecise and it needs greater clarity to be sound and effective. It is telling that the primary TCPA garden city principles of Land value capture for the benefit of the community, and community ownership of land and long-term stewardship of assets are only addressed in the final policy. Significant community ownership is the key to empowering people to engage with the creation of a successful garden village. True garden settlements use the increase in land value to meet the up-front and long-term costs of all infrastructure, community facilities and other amenities. In a true garden settlement, a significant share of the land value created is invested in the community itself, providing long-term benefits for all. Garden community developments should be places in which the co-operative spirit is the guiding ethic. The garden community approach offers an opportunity to change a planning culture which is all too often marked by polarised views on all sides, and to develop a genuine sense of shared ownership in the enterprise of building a new community. A dedicated organisation, with the right staff and skills, is essential to oversee the complex task of delivering a new community. Delivery vehicles that commit to high standards and long-term delivery make private and public sector investment an attractive prospect. Such an approach also provides reassurance for local people as it demonstrates a commitment to deliver what is promised.

17/33

We therefore welcome the Collaborative Housing Report⁶³ and steps are underway to establish a Community Land Trust for Salt Cross, together with community housing. The CLT would ideally own a range of assets including shops, pubs, business space, leisure, community farms and growing spaces and other amenity space and manage community owned assets which in turn bring in an income, as in the original Garden Cities. The CLT could include a community energy services company (which links well with the Project LEO Eynsham Smart and Fair Futures energy project) and could bring a strong vision, leadership and community engagement and empowerment. The requirement for a Community Management and Maintenance Plan (CMMP) is supported. Although other guidance is referenced, the TCPA 2017 guide is not.⁶⁴ This states *'Long-term stewardship should be a consideration right from the very first stages of planning a new development'* and also *'It should be determined whether there are existing community organisations, such as a community land trust'*: much work is still required secure these core GV aims.

Suggestions - Policy 31

Add to Policy 31 'facilitate the objectives of the emerging Community Land Trust and wide community ownership of assets'.

Cross refer- Policy 16 -appointment of a Travel Plan Co-ordinator and the Community Development Officer (Policy 5).

The objectives in respect of biodiversity, (as well as travel and employment) would be more likely to

⁶³ Collaborative Housing, *Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village* June 2002

⁶⁴ Guide 9: Long-term Stewardship (2017)

succeed through employment of forest garden, travel and community employment assistants - possibly merged into a new profession of garden village enablers, as suggested under travel demand management (8.47 and Policy 16) with appointment of a Travel Plan Co-ordinator or the Community Development Officer (Policy 5).

Add the Community Management and Maintenance Plan must reflect the Policies and aspirations of this AAP, eg climate action, protection of biodiversity and natural capital, banning use of pesticides (only mentioned in 5.23 under natural capital) and other aspirations eg community tree planting, saving acorns etc (6.75, 6.90), organic principles in community food growing etc. We note that the current organic farm on site is not mentioned, but this organic land should be seen as an asset and the quality of land preserved and reused where possible. Cross refer Policy 8 – Enabling healthy local food choices which mentions ‘a community farm/orchard’.

NB many of these principles will need to be embedded in the Construction process eg to avoid contamination of organic land with pesticides.

Add links with Community Development Officer, Travel Plan Co-ordinator or other community support staff.

Add the CMMP must be approved and in place before any work starts on site.

Suggestions - Measures of success (page 184 and Section 12)

Should include extent of community ownership and amount of community facilities.

Cross refer to CMMP and other sections eg 6.75 6.90.

Other evidence

The Plunkett Foundation has an excellent track record in supporting co-operative, community-owned facilities, like pubs when the breweries pulled out. They have provided grants to villages to get enterprises up and running all over the country including Oxfordshire. They may still be based in Long Hanborough.

There are good examples of equitable integration in the USA (eg. Newton, Mass) where old people's accommodation and care homes are integrated into community college campuses with the practice of young and old co-mentoring each other, teaching and learning together and offer mutual support. In Salt Cross it's essential that any care homes or sheltered housing is slap bang in the middle of settlements with access of people of all ages. The balance of housing types and community ownership in Milton Keynes is much larger, but it did carefully integrate the original villages into the new town, kept its own resources democratically managed and is a super-vibrant and successful town: from sporting excellence to cultural organisations to bio-diversity, including millions of trees.

Part 4 Measuring Progress

12. The Delivery and Monitoring Framework

This new section (12) is key to achieving the aspirations set out in the preceding Policies. In EPIC/GreenTEA's previous response we stated that ‘The AAP should be enhanced by addition of specific lower level policies, preferably defined by *numerical or measurable criteria*, that can be clearly measured on the ground, thereby enabling full implementation of the AAP's good intentions’. We consider that this aim has been only partially met, for instance in respect of Policy 2 (net zero carbon development) where ‘KPIs aligning with net-zero carbon development, and five-year post-construction energy monitoring, required as condition’. Other policy areas are less precise.

17/34

Suggestions- section 12

We have suggested under the themes above some areas for greater precision of measures of success. We note 12.5 *The intention is for this progress to be reported through the District Council's annual monitoring report with any significant 'deviation' off-track to be reported as appropriate and addressed*

for example through a partial review of the AAP and/or direct engagement with those bringing the scheme forward 'on the ground' We think that 12.5 should go further. The timescale must allow annual review up to and beyond completion. We trust that there will be provision for standards and targets to be reviewed throughout the lifetime of the project.

Where extra studies are required there must be provision for these to be assessed rigorously, and if necessary, challenge and enforced.

To be effective, we suggest more quantified and qualitative measures of success and failure (rather than simple yes/no), a timescale and details of how this process will be resourced, monitored and enforced over time. There is an assumption in the Framework that everything will automatically be successful, but a column could be added that would indicate how failure will be identified, addressed and rectified.

We hope you find our response both supportive of the plan and constructive in relation to improvements.

Key respondents

R A Bovey [redacted]
Sarah Couch, [redacted]
Ursula Howard, [redacted]
Nigel Pearce [redacted]
Sue Raikes, [redacted]
Amanda Stibrany [redacted]
Angie Titchen, [redacted]
With other contributions from the community

Members of Eynsham Smart and Fair Futures Inspiration Panel, including

Catriona Bass, Long Mead Local Wildlife Site, Eynsham
Mark Chadwick MRTPI, Howard Cole
Nicky Chambers sustainability professional MSc FRSA, [redacted]
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[redacted]
Charlie Luxton, Charlie Luxton Design, Hook Norton, Oxfordshire

Response to the Area Action Plan for Salt Cross Garden Village from Eynsham Cohousing

1. Introduction

This response focuses on the support for cohousing to be delivered as part of the Salt Cross Garden village Area Action Plan (AAP).

Our group, currently known as Eynsham Cohousing, are a newly formed group currently comprising of 15 members. There is a wider group who would be interested in joining once the project is more defined. Group members span a variety of ages and backgrounds and include young families and key workers (within the local NHS and others).

18/01

They are currently being supported by the [Collaborative Housing Hub](#) to help the group build its vision and objectives before becoming a fully incorporated group.

Our cohousing group will also work alongside the establishment of a community-led trust who will explore the possibilities for taking a wider role in the development in line with the scoping report¹. A response on the potential for wider input by a community-led trust is the subject of a separate consultation response submitted by the Collaborative Housing Hub.

Our planned cohousing scheme will meet many of the principles and objectives for the Salt Cross Garden Village - providing an exemplar in terms of sustainable design and living, intergenerational living that is designed to foster community and build connections between residents and with the wider community, and a focus on community resilience through activities like local food growing. The vision is that the scheme will provide a mix of sizes and tenures including affordable housing. Our group will work together to commission a scheme for ourselves with an emphasis on beautiful design that incorporates a mixture of private and shared spaces for use by the residents and the wider community.

The initial scheme will focus on an exemplar site for around 30-40 homes with the view that this could be replicated with further schemes across the development.

This response includes 4 substantive points for consideration.

1. How should land be brought forward for a cohousing scheme?
2. Flexibility in the design code to allow for the particular design needs of cohousing projects
3. How can the price and payment for land be enabled?
4. How can affordable housing be delivered on a cohousing scheme

2. Cohousing in the AAP

¹ Collaborative Housing (2020) 'Exploring the options for a Community Land Trust at the Oxfordshire Cotswolds Garden Village' [[Accessed through WODC's Salt Cross Garden Village AAP Consultation Page](#)]

Cohousing is largely considered under the specialist housing requirements and could be delivered as part of the specialist housing requirements on the site well as considered as part of the self-build requirements.

18/02

3. Meeting housing needs

The cohousing project would fully meet the objectives of the policies 22,23 and 25 of the AAP. Notably:

- Housing accessible to those on a range of incomes including affordable housing that is accessible to local people
- A mix of sizes to meet the needs of single people, couples and families
- An opportunity to do a group custom-built development at scale
- High quality design

4. How should land be bought forward?

The idea of bringing forward clusters of homes as part of each phase of the development could work well - allowing for follow on schemes which can learn from and complement previous projects.

However, alternatively, land could potentially be transferred as a stand-alone development. The initial Eynsham Cohousing scheme can be an exemplar for community-led self-build and custom-build as well as developer-led housing and so should be brought forward at the earliest stage of the development as a 'pioneer' project. This could be facilitated by a separate access from the north of the site.

18/02
cont.

In terms of being able to compete on a level playing field for land we would welcome the restriction of marketing of designated land to cohousing or other community led projects.

5. Design code

Whilst recognising the need for overall design codes for self-build plots, it will be important that this does not present obstacles to the ambitions of cohousing projects.

In particular there would need to be allowance made for shared communal buildings and shared open space and common features such as off plot car parking -usually at the perimeter of the site.

We will want to create something beautiful that uses modern methods of construction to achieve high environmental sustainability throughout the build.

6. Price and payment for land including mechanisms for affordable housing

The price of the land is critical, particularly where the scheme is delivering affordable housing and to allow for the additional cost of the communal areas. Any land within the scheme for affordable housing would need to be discounted.

Also 100% upfront payment for the land can be a barrier when providing high levels of affordable housing. Flexible ways to release land through staged payments can work well.

There are a range of ways that affordable housing can be brought forward as part of cohousing schemes. For example, through a partnership with a registered provider, which could be a Community Land Trust or a Housing Association, or through mutual co-operative arrangements.

Completed examples include:

- The New Ground project of 25 apartments in High Barnet delivered in partnership with small housing association Housing for Women, who operate as the landlord of a third of the homes².
- Bridport Cohousing, a scheme of 53 homes where all the private homes have a leasehold to a Community Land Trust, an organisation which retains any unsold equity in the discounted market and shared ownership properties. A Registered Provider partner, Bournemouth Churches, manages the 26 affordable rented properties³.

18/02
cont.

There will need to be some flexibility regarding lettings arrangements for any affordable rented housing. Cohousing schemes are intentional communities and therefore any prospective residents need to be happy to live under the shared ethos of the scheme and play their part in the ongoing management of the project. There would therefore need to be a joint process between West Oxfordshire District Council and our cohousing group to select applicants.

7. Eynsham cohousing site requirements

- Cohousing schemes are generally most financially and socially viable at between 30 and 40 units. Therefore, parcels of land that can incorporate this together with the common facilities are needed. Cohousing schemes can achieve a higher density in the built area to offset the communal space.
- Our group has a preference for a site in a more rural setting -at the site boundary. On site or access to community growing space will be important. There is interest in the parcel of land to the north of the site, adjoining Cuckoo Lane however clearly the group would need to undertake a site appraisal before any agreement was reached.
- A site that could be brought forward early on in the development is required to meet the existing need.

18/02
cont.

8. More about Eynsham Cohousing

The current members of the group have a significant range of skills which include:

- Professional architects
- Civil engineers
- Project management
- Experience in self build -both individually and working with groups
- Experience in the design and construction of environmentally sustainable construction
- Experience of neighbourhood planning
- Community engagement
- Public Health
- Commercial negotiation

² New Ground, Older Women's Cohousing ([link](#))

³ Bridport Cohousing ([link](#))

9. Next steps for the group

Our group is gradually building membership and will aim to increase this membership through local publicity.

We have become members of the Collaborative Housing Hub and as such receive support and training. This includes

- Training sessions to help the group establish their vision, find ways of working together as a group including decision making, establishing key milestones and objectives for the project and getting the message out to key stakeholders and prospective residents.
- Technical help in providing a site brief and undertaking site appraisals
- Help with business planning and funding arrangements
- Help with development partnerships
- Help with liaison with the local authority
- Ongoing project management through the planning and build stages of the project
- Help with governance, allocations and management arrangements for the built units

This will help the group to quickly establish itself and get ready to be in a position to take transfer of land.

18/02
cont.

Eynsham Cohousing. October 2020



EYNSHAM PARISH COUNCIL

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Planning Policy Team
West Oxfordshire District Council

Sent via email – planning.policy@westoxon.gov.uk

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:-

19/01

- 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.

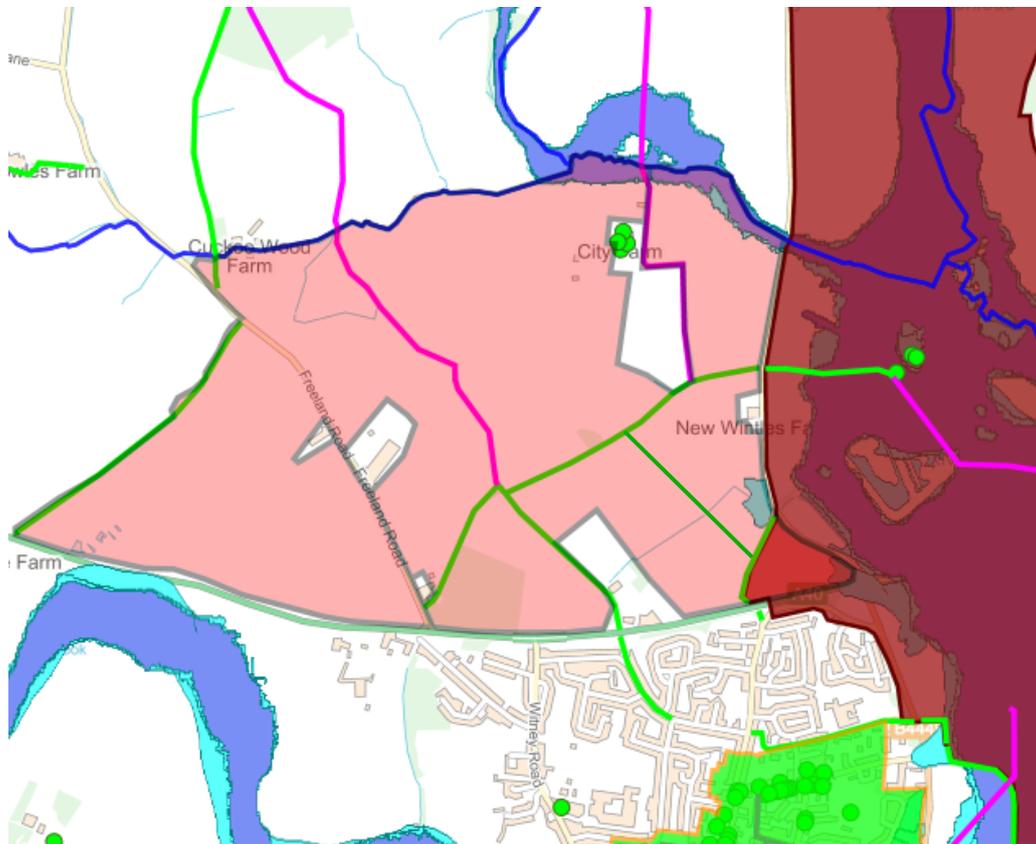
Errors/Omissions/Inaccuracies:-

- 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), PRow's (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)).

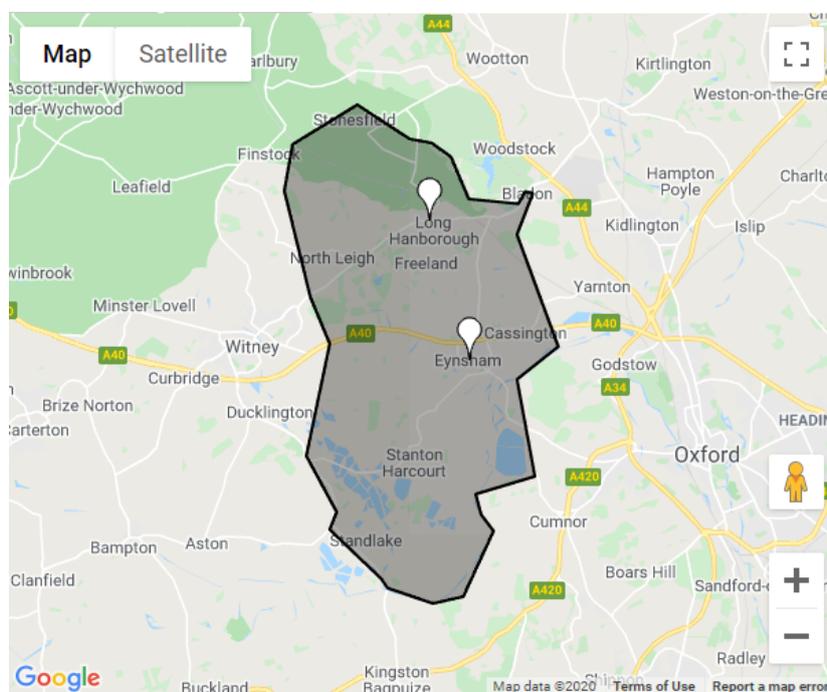
Eynsham Parish Council wish to make the following observations regarding the policies:-

Climate action

1. Policy 1 – Climate Resilience and Adaptation 19/02
 - 1.1. It is noted that the climate change issues and aspirations are broad and will form a ‘golden thread’¹ 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 19/03
 - 2.1. We fully support this policy as a minimum.
3. Policy 3 – Towards ‘Zero-Waste’ Through the Circular Economy 19/04
 - 3.1. We fully support this policy as a minimum.

Healthy Place Shaping

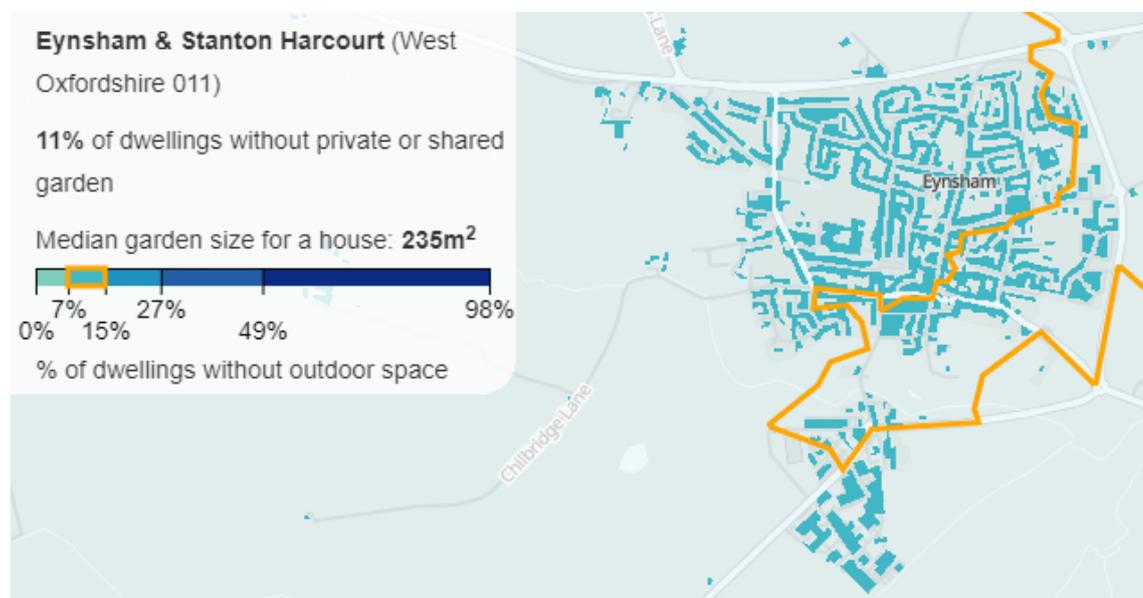
4. Policy 4 – Adopting Healthy Place Shaping Principles 19/05
 - 4.1. At Policy 4 (a), the term ‘local’ is used. This should be replaced with ‘Eynsham practice area health and wellbeing needs...’ The Eynsham practice area is shown in Figure 2.



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

¹ 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

19/06

- 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.

19/07

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.² 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). 19/08
- 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.

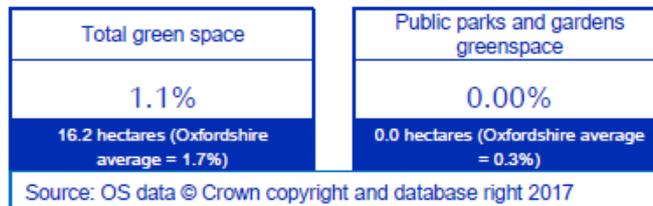
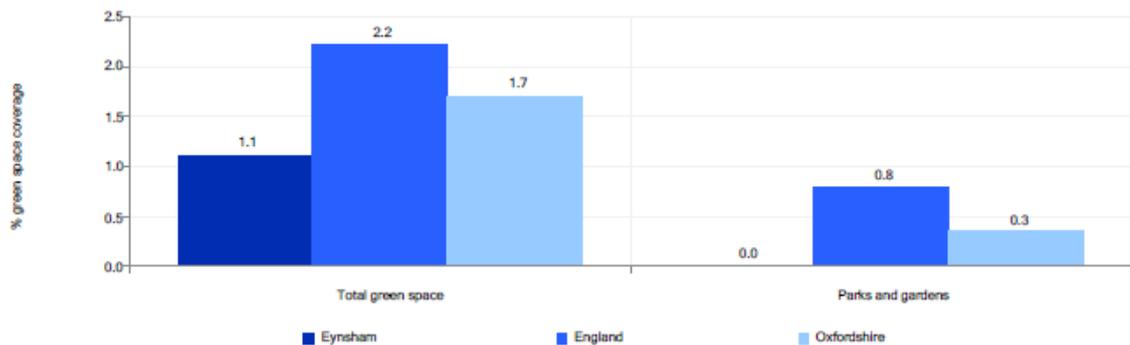


Figure: Percentage of green space coverage
Source: OS data © Crown copyright and database right 2017

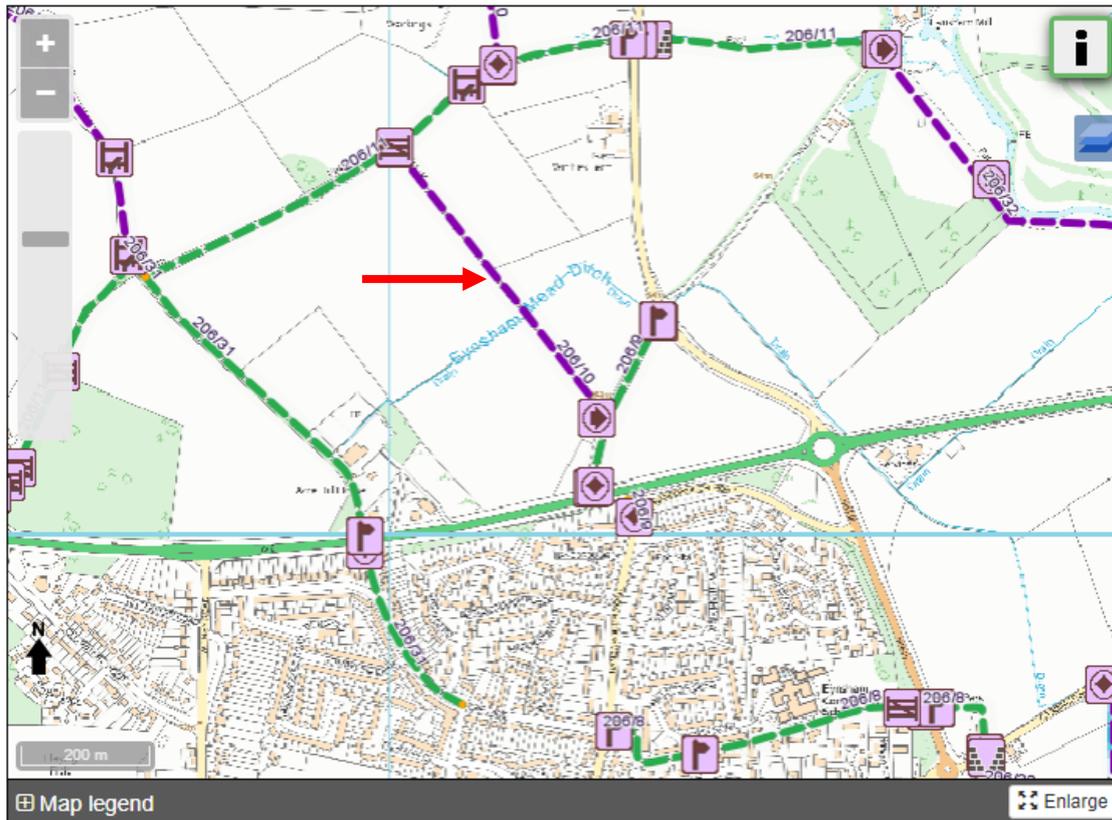


(Figure 4 – OCSI (2020). *Local Insight Profile for Eynsham: Communities and environment - Green space coverage* pg. 65)

- 7.3. The principle of a discrete garden village³ 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).

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

³ 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.

19/09

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%.⁴ 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.

19/10

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.

⁴ <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

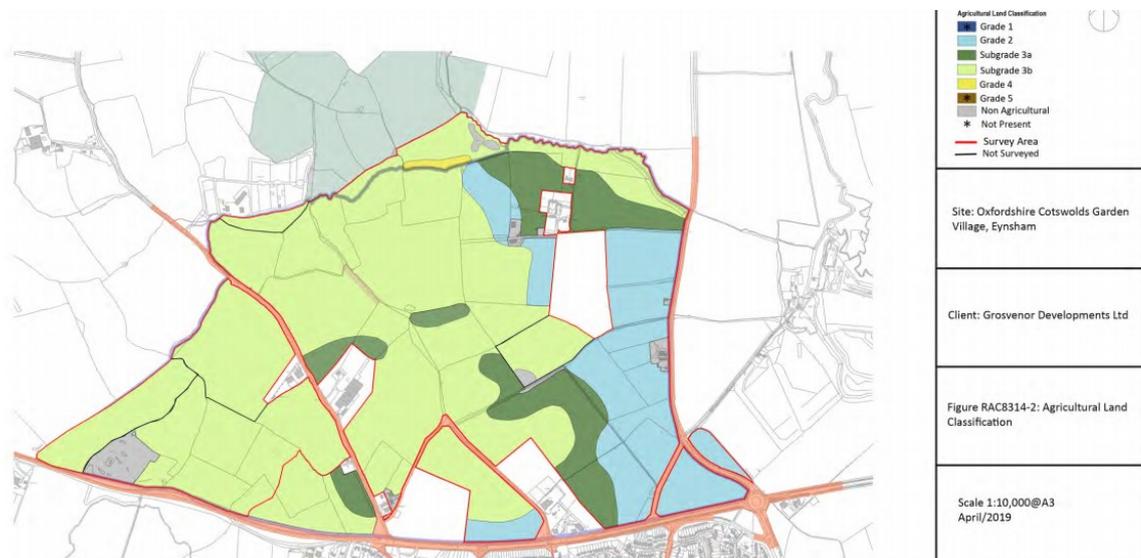
19/11

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.

19/12



(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.

19/13

Movement and Connectivity

13. Policy 13 - Movement and Connectivity Key Design Principles

19/14

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.

14.1. 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

19/17

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.

19/18

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

19/19

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 19/20
- 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. 19/21
21. Policy 21 - Employment, skills and training 19/22
- 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. 19/23
- 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 19/24
- 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 19/25
- 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 19/26
- 25.1. The Council support this policy.
26. Policy 26 - Meeting Specialist Housing Needs 19/27
- 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 19/28
- 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

19/29

- 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

19/30

- 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.

19/31
cont.

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

385m² 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

19/31
cont.

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. 190m² 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.

19/31
cont.

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, than 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.

19/31
cont.

- 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.

19/31
cont.

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 19/32

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:- 19/33

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.

19/33
cont.

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



Comments on the Salt Cross Garden Village Pre-Submission Draft Area Action Plan, July 2020

Founded in 1986, Eynsham Roadrunners is a fully inclusive community-based running club with strong links to Eynsham. Most of our 180 members live in or near to Eynsham. We support our members' running goals, from starting out to achieving their best in endurance and competitive running. We pride ourselves on our wholly supportive, encouraging, connecting and inclusive environment, to support mental as well as physical well-being. Our club constitution is rooted in providing facilities and opportunities for running and generally to promote, encourage and facilitate running amongst the community. Some members have been opposed to what can be viewed as over-development in Eynsham. However, as a club we are interested to strongly influence what happens next to support our objectives as a running club and a growing community of runners in West Oxfordshire. Whilst we acknowledge our good fortune in having great countryside options for running, we note the lack of a training running track and traffic-free running and recreational training trails.

20/01

Eynsham Roadrunners (the Club) welcome the opportunity to submit comments on the draft Area Action Plan (AAP). The plan notes that the garden village site and the concept of a garden village in this location are intrinsically linked to existing development in Eynsham. The garden village and Eynsham are physically separated only by the A40. Appendix 7 on Key Considerations and Opportunities recognises that there must be effective integration of the two communities to achieve the maximum benefits for both. It also acknowledges that Eynsham has a shortage of open space and that there are opportunities to provide a range of different formal and informal green spaces across the garden village site. The AAP states "good linkages to Eynsham should ensure that the increase in provision also benefits the existing community". As a thriving part of the local community, the Club wants to ensure that the garden village offers the opportunity for Eynsham residents to enjoy the maximum benefits of improved recreational provision in the local area.

20/01
cont.

The principles underlying the development of new garden villages include access to green space, nature, fresh air, walking and cycling, sports and outdoor leisure activities, etc together with a vibrant social life with active community societies, with locally organised sports, arts and community events. Outdoor recreation must be fully incorporated in the plans for Salt Cross garden village.

One of the key elements of the AAP is the creation of multi-functional green and blue infrastructure including a new biodiverse Country Park. The Club welcomes Policy 7 in the AAP document which states that “The planning, design and delivery of Salt Cross will be underpinned by a comprehensive approach to the provision, maintenance and long term management of a high quality network of green and blue infrastructure, through the submission, for approval, of a Green Infrastructure Strategy with the outline planning application for the garden settlement”.

20/02

The Club particularly welcomes the proposal to create a Country Park and the need to provide a total of 40 hectares of green infrastructure as a minimum requirement. We support Policy 28 which indicates that there will be an extensive green infrastructure network of at least 40 hectares for a number of specified types of green infrastructure including formal parks and gardens, amenity green space, natural and semi-natural green space, outdoor sports, allotments, community orchards, play areas and other outdoor provision. The proposed Country Park would have significant benefits in enabling club members and local residents as a whole to take advantage of large open areas which are not readily available in Eynsham.

20/03

Policy 28 indicates that there will be continuous green space around the northern fringe of the site in the form of a biodiverse Country Park to include a mixture of uses and activities including nature reserves and providing effective connections into adjacent countryside. However, the Illustrative Spatial Framework for the garden village in Figure 11.6 does not clearly identify an area of land for the creation of a Country Park. The Club is concerned that the spatial framework in the draft AAP does not give sufficient certainty to the principle of establishing a Country Park and that a specific allocation for the Country Park should be added to Figure 11.6.

20/04

It is important that the approved version of the AAP sets out a clear basis for the layout and content of the garden village development which the planning application will have to follow. The green infrastructure network and the proposal for a Country Park would be an effective and acceptable way of meeting the requirements for new/better outdoor recreational provision in the Eynsham area. The AAP needs to establish both the principle and the location of the Country Park so that it becomes a definitive land use requirement to be met in the Council’s decision on the outline planning application.

Dr John England MBE, BA(Hons), DipTP, PhD, MRTPI – Chartered Town Planner
on behalf of Simon Walker, Chairman, Eynsham Roadrunners

SALT CROSS GARDEN VILLAGE AREA ACTION PLAN CONSULTATION

A RESPONSE BY FREELAND PARISH COUNCIL

SEPTEMBER 2020

Introduction

This response has been prepared by Freeland Parish Council in relation to the Draft Area Action Plan (AAP) for the proposed Salt Cross garden village published for consultation by West Oxfordshire District Council in September 2020.

21/01

These comments are consistent with, and should be read in conjunction with, the Parish Council's previous responses to the Masterplan Framework, first published by Grosvenor in November 2019.

The Parish Council welcomes the fact that WODC have recognized our legitimate concerns previously set out in responses at each stage of the consultation process.

The primary issues identified are as follows:

- The principle of screening the development through the provision of a substantial woodland belt to the north and west of the site.
- The reconfiguration of the Cuckoo Lane / Wroslyn Road junction and other measures to deter rat-running through Freeland village.
- A recognition of the importance of respecting our dark skies by eliminating light pollution.
- A commitment to the provision of a cycle path linking Freeland and Church Hanborough to the new village and thence to Eynsham.

Whilst the AAP addresses these concerns, it is apparent that further clarification and commitment are required. This is particularly important when assessing the Outline Planning Application for Salt Cross as already submitted, as it is inconsistent with the AAP in a number of fundamental respects. Freeland Parish Council will provide a detailed response to the Outline Planning Application in due course.

For clarity the following comments are cross-referenced to the relevant section and paragraph of the Draft Plan. Where appropriate the points of non-compliance between the AAP and the Outline Planning Application already identified have also been highlighted.

AAP DETAILED COMMENTS

Summary – the AAP at a glance

Key outputs at Salt Cross are expected to include:

Bullet Point 6

“The protection and provision of woodland and trees to reflect the wider setting of the site within the former Royal Hunting Forest of Wychwood and to enable and encourage carbon sequestration”

21/02

Freeland Parish Council has consistently pointed to the importance of screening the new village from the high quality open countryside to the north and west through the provision of a substantial woodland screen belt through the proposed country park and around the science park. The principle of ‘enveloping’ the development within woodland, in accordance with the Green Infrastructure Plan (Figure 6.3), will, inter alia, in the medium/ long term, mitigate the severe landscape impacts of development upon the character of the Wychwood Forest, and reflect the character of the estate woodlands to the north, increasing biodiversity, carbon sequestration, shade, shelter from cold north winds whilst creating large scale wooded backdrop over the roofscape.

Freeland Parish Council are, therefore, wholly supportive of the landscape design approach now embodied within the AAP and consequently totally opposed to the Outline Planning Application Masterplan, which **excludes** this essential woodland belt.

Bullet Point 15

“A new pedestrian and cycle route to Hanborough Station along Lower Road to provide convenient and safe access by rail into central Oxford and beyond.....”

21/03

Freeland Parish Council has consistently advocated the upgrading of the existing public footpath to accommodate cycles linking Freeland and Church Hanborough with Eynsham, via the new village. Provision of this safe link will take vulnerable schoolchildren off Cuckoo Lane, which will experience increased traffic flows, whilst also encouraging existing residents to cycle to the Park and Ride in the absence of a bus service to Freeland and Church Hanborough.

The commitment to this in the Outline Planning Application is currently limited to a financial contribution towards improvement of the surfacing and clearance of vegetation along the bridleway outside the site boundary through Section 106.

Proposed Bullet Point 27

A key output for local villagers, who will encounter increased traffic flows on the local road network, is the need to control rat-running through Freeland village by the adoption of a 20mph speed limit, traffic calming measures at either end of Wroslyn Road and the reconfiguration of the Cuckoo Lane/ Wroslyn Road junction.

1 Introduction

1.4/ 1.5 The Parish Council's representatives have participated constructively and in good faith at every step of the consultation process. However, our experience has been that our legitimate concerns and propose solutions have been consistently marginalised or ignored by the developer team, whilst being recognized and largely adopted by the WODC AAP team.

21/04

Similarly, the conclusions of the excellent LUC "Green Infrastructure Study" of August 2019 have been, in large part, ignored by the developer team, particularly in relation to the principle of enclosure of the site within a continuous woodland screen belt.

Figure 6.1 of the Strategic G.I. Principles Report specifically states that

"Edge of settlement to be given specific care treatment to reference the woodlands and parklands of nearby Eynsham Hall and Blenheim Palace Park."

3 The Garden Village Site

3.17 It is refreshing to see that the importance of the site's location within the Wychwood Forest Project Area recognized, together with the landscape significance of the many estate woodlands which characterize the high quality rural landscape to the north.

21/05

The acknowledgement that significant (adverse) change to the character of the local landscape has been "*.....largely associated with the expansion of neighbouring villages during the 20th century*" is also to be welcomed.

3.20 In response to the consultation process and the above analysis, a further "main issue" is required, as follows:

- ***"To mitigate the landscape impact of development upon the Wychwood Forest Project Area."***

5 Climate action

5.24 Bullet Point 1

".....The protection and provision of trees and woodland to provide shade and reduce wind speeds, encourage carbon sequestration and potentially develop a new and sustainable source of low carbon woodfuel (logs, chips and pellets)"

21/06

The traditional function of estate woodlands, such as proliferate north of the site (Eynsham Hall, Freeland House and Blenheim Palace Park), embodies the majority of these functions.

The enclosure of the new village and science park within a continuous, indigenous mixed, multi layered woodland will continue this tradition for the benefit of the new village residents, whilst also protecting the existing estate farmland landscape.

By way of contrast, the developer's Outline Proposals, whilst allocating 40% of the site to "green open space", includes only c2.5% of woodland within that figure, the majority of which is concentrated around the self build site. This level of provision is totally inadequate and unacceptable, given:

- The need to mitigate the landscape impact of development upon the high quality farmland landscape to the north and west, through the sensitive integration of a sinuous belt of screen woodland within the linear park and around the science park with a minimum width of 100m. (Ref Figure 6.3 Strategic Green Infrastructure Principles.)
- Key vista corridors through the woodland, e.g. to Church Hanborough spire, to be retained.
- Additional woodland is required in order to increase biodiversity and the park's function as a wildlife corridor, thereby increasing connectivity.
- The provision of woodland screen will assist in mitigating the impact of development upon its setting within the Wychwood Forest Project Area.
- More woodland is required in response to the climate emergency in order to sequester carbon and generate oxygen in the long term.
- Enveloping the site in woodland will also reflect the pattern of estate woodland which characterises the landscape north of the site.
- The woodland will also function as a shelterbelt from cold northerly winds in winter, creating warm, south facing parkland.
- Woodland planting of wetland species, including willow, alder and poplar within the valley of the stream course will assist in reducing run-off and flooding downstream.

6 Healthy place shaping

6.36 What is green infrastructure?

Woodland is particularly important to a healthy quality of life. Its scale and enclosure provides a sense of permanence and continuity with the passing of the seasons, whilst creating a rural skyline and placing settlements within a green context.

6.45

- *“Contextual – Ensures that the green infrastructure reflects the character of the local environment and positively contributes to local identity, landscape character and vernacular, and a sense of place”*

21/07

Freeland Parish Council concurs with these fundamental requirements.

The provision of a screen woodland through the Country Park and around the science park is essential to meet these objectives, i.e.:

21/08

- to reflect the pattern of estate woodlands
- protect and enhance the landscape character of the Wychwood Forest
- screen the new village from surrounding high quality estate farmlands
- maintain the rural character of West Oxfordshire.
- *“Climate resilient – Ensures that green infrastructure effectively is resilient to climate change, and opportunities for shade provision, carbon storage, Improved soil and air quality, and reduced noise and light pollution are maximized.”*
 - This core standard can only be achieved through a significant increase in the area of woodland, currently shown at c2.5% of total area in the Outline Planning Application Masterplan.

6.48 Achievement of the Design Award and 'Full Award – Excellent' will only be achieved by significantly increasing the area of woodland from that currently proposed by the developer. 21/09

The Green infrastructure vision for Salt Cross

6.49 – Vision Point 2

“Green Infrastructure will reference the local and wider landscape setting to create a bold framework of woodlands and open spaces, reflecting existing trees and woods, whilst echoing the historic designed landscapes of Eynsham hall Park and Blenheim Palace Park.” 21/10

The current proposals shown on the Outline Planning Application blatantly ignores the site's wider landscape setting. The landscape proposals do not reflect the pattern of historic estate woodlands which characterise the landscape to the north of the site. This can only be achieved by a substantial woodland belt threading through the proposed country park and around the science park. The outline planning application is, therefore, non-compliant with the AAP.

6.52 The “Four Priority Characteristics” do not reflect Freeland Parish Council's consistent response throughout the consultation process which emphasizes the **estate woodland character** of the site's landscape context and the need to replicate this by enveloping the development within a woodland belt. 21/11

It is proposed, therefore, that the following should be added to the first priority:

“the importance of adopting a ‘landscape-led’ development which reflects the wooded estate character of the Wychwood Forest landscape context;”

A ‘Landscape-led’ approach

6.53 Freeland Parish Council is wholly supportive of the approach adopted by the AAP, but bitterly disappointed by the developer's weak interpretation of the AAP's requirements, particularly in relation to the extent and location of woodland creation proposed in the Outline Planning Application. 21/12

6.59 The Outline Planning Application is non compliant with the AAP in that it does not reflect the need to respect *“the landscape setting of the site”*, leaving development visible from the north and significantly impacting upon the wooded estate farmland and character of the Wychwood Forest Project Area, contrary to Local Plan Policy. 21/13

Corridors, connections and linkages

6.65

“In considering wider connections, existing rights of way should form the basis to connect with the villages of Freeland, Church Hanborough and Long Hanborough to the north”.

Freeland Parish Council has consistently advocated the upgrading of the existing public footpath which links Freeland and Church Hanborough to Eynsham through the site of the new village, to cycleway standard, albeit unlit. 21/14

This requirement should be a Condition of any planning permission granted and a legal commitment on behalf of the developer.

6.67 A vital component of successful 'connectivity' to promote biodiversity will require the establishment of a continuous woodland belt threading its way through the proposed Country Park and wrapping around the science park. 21/15

6.76 Freeland Parish Council supports the concept of advanced planting managed by a developer funded body from the outset, in order to achieve successful establishment and management. 21/16

Advanced planting is particularly important in establishing the woodland screen belt in order to achieve screening of construction and the development at the earliest opportunity.

NB: Climate change is making the successful establishment of new planting more problematic. Drier, warmer and windier growing seasons means that watering and the replacement of dying plants are essential features of any management plan. These should be budgeted for accordingly.

6.79 The percentage of woodland cover indicated by the Outline Planning Application at c2.5% is totally inadequate given the scale of the proposed development, its CO2 footprint and the sensitivity of the site's landscape setting. 21/17

Policy 7. Green Infrastructure

Freeland Parish Council, whilst supportive of the policies advocated for Green Infrastructure, propose the following clarification to point 4: 21/18

"..... a landscaping scheme which identifies how the existing landscape within and around the site has been assessed and how it informs the new community and its green infrastructure network, including the provision of an indigenous woodland screen belt throughout the northern and western site boundaries, long distance views....."

7. Protecting and enhancing environmental assets

Introduction

7.5 *"There are also other areas of lowland mixed deciduous woodland priority habitat throughout the site, particularly along the northern boundary in association with the watercourse."*

This statement is factually incorrect. Aside from the Millennium Wood, there are currently no woodlands within the site. Those trees which do exist are individual hedgerow trees. Hence the importance of establishing new woodland to integrate the development site into the well wooded adjoining landscape. 21/19

7.26 Field 15 has been identified as having a moderate IAPA score in the 2016 botanical survey. In order to establish the continuous screen woodland belt through the Country Park, a small area of grass sward and topsoil containing the wildflower seedbank will require translocation to adjoining meadow area(s) within the proposed park. 21/20

Artificial light

7.109 Throughout the consultation process Freeland Parish Council have emphasized the need to respect the dark skies currently enjoyed by the residents of Freeland and Church Hanborough. Neither of these villages have street lights. 21/21

Street lighting adds to streetscape clutter and projects an intrusive glow into adjoining countryside. The Outline Planning Application has not taken this into account and presumes suburban levels of street lighting in parts of the village, which would be totally unacceptable.

Contrary to commonly held preconceptions, our local police officers partly attribute the low local crime rate in Freeland to the absence of street lights.

Movement and connectivity - "At a glance"

Add the following Core Objectives:

GV 23 *"To prevent the rat running of additional traffic through local villages, in particular Freeland."* 21/22

GV 24 *"To provide a dedicated and direct cycle route linking Freeland and Church Hanborough to Eynsham and the proposed Park and Ride via the new village."*

Movement and Connectivity Strategy - Key overarching principles

Connectivity within the wider area

Proposed amendment to final principle as follows: 21/23

"Good walking, cycling and public transport connections must be provided to the wider area including villages to the north including Freeland, Long Hanborough and Church Hanborough, as well as Hanborough Station, Oxford, Witney and beyond."

Policy 14 – Active and Healthy Travel

Proposed additional policy: 21/24

A cycleway is to be provided along the route of the existing footpath linking Freeland and Church Hanborough villages to Eynsham and the Park and Ride via the new village.

Policy 17 – Road Connectivity and Access

Proposed additional sentence:

..... the developer will be required to fund the introduction of village threshold entrances, designed to the satisfaction of Freeland Parish Council, at either end of Wroslyn Road, and the infrastructure to support the introduction of a 20mph speed limit through Freeland village. 21/25

9 Enterprise, innovation and productivity

Design led

9.17 Proposed additional sentence"

Buildings are to be high quality, low rise "pavilions" with shallow, low pitched, deeply overhanging roofs. Materials to be high quality and sympathetic to the Cotswold context and in accordance with the WODC Design Guide, e.g. Cotswold stone and slate. (NB: Stratford Business and Technology Park, Banbury Road, Stratford upon Avon is a good example.) 21/26

Figure 11.6 Salt Cross Illustrative Spatial Framework Plan

The “Wetland Reserve” indicated in the north west of the site is not viable in this location, given the topography of the site (i.e. a north facing well drained slope) and the limited extent of the stream’s floodplain within the site. (Ref Figure 7.7 Sustainable Drainage and Green-Blue Infrastructure Opportunities and Constraints.

21/27

11 Building a strong, vibrant and sustainable community

Policy 28 Land uses and layout – the spatial framework

Layout

Proposed amendment to bullet point 3:

“Continuous green space around the northern fringe of the site in the form of a biodiverse Country Park which will incorporate a continuous screen woodland belt a minimum of 100m in width (Ref. Figure 6.3 Strategic Green Infrastructure Principles) and will include a mixture of uses and activities, including nature reserves and providing effective connections into adjacent countryside. The screen woodland to continue around the northern and western edges of the science park.”

21/28

Representation received by: Kevin Green

Dated: 10 September 2020

AAP Section: All

Question:2 First Name	Question:3 Last Name	Question:9 To which part of the area action plan does this representation relate?	Question:9 To which part of the area action plan does this representation relate? [Comment]	Question:10 Do you consider the AAP to be legally compliant?	Question:11 Do you consider the AAP to be sound?	Question:12 Do you believe the AAP complies with the duty to co-operate?	Question:13 Please give details of why you consider the Area Action Plan is not legally compliant or is...	Question:14 Please set out what modification(s) you consider necessary to make the Area Action Plan legally...	Question:15 If your representation is seeking a modification, do you consider it necessary to participate...
Kevin	Green	Policy	The entire thing	Yes	No	No	Co-operation would mean taking into account the wants and needs of West Oxfordshire, particularly the lack of decent infrastructure, resulting in terrible traffic congestion and pollution, something which has been known about and ignored for 20+ years. Adding 2,200+ houses onto the A40 will make a terrible road virtually unusable, and adding a bus lane will not in any way mitigate this as most traffic heading towards Oxford continues past it, not into Oxford.	Greenfield land should not be built on. The whole plan should be abandoned as reckless and damaging to the environment.	No, I do not wish to participate at the oral examination.

From: Graham G [REDACTED]
Sent: 22 October 2020 18:26
To: Planning Policy (WODC)
Subject: the community letter which Eynsham's Green TEA, and EPIC have prepared for people to sign.

Dear Sirs

1. I'm writing to say that I support the community letter which Eynsham's Green TEA, and EPIC have prepared for people to sign. Their letter is a shortened version of their formal response to the AAP consultation. 23/01
2. I'd like to reinforce the following points from their letter:
Para 5.24-mentions wood fuel: this should be deleted: it is not a zero carbon heating solution and it damages local air quality. 23/02

We cannot consider Policy 4 effective yet because of the fundamentally flawed objectivity on the area's assessed needs. This is in relation to transport infrastructure development that will reduce air pollution¹². It will only be fully effective through joint working with Oxfordshire County Council (OCC), as a reduction in the air pollution levels along the A40 must be achieved by the time the first residents move in. 23/03

Also reducing effectiveness is the omission in the key outputs at Salt Cross section (p.7) of a recognition of the relationship between green and wild space with physical, mental and emotional health of current and future residents and workers. 23/04
While the mention of historic designed parks at Blenheim and Eynsham Hall give wider context, it is important that the site's traditional rural landscape character of fields, hedgerows and trees is retained and tree planting reinforced(Policy 7).

We strongly support new woodland creation and scrub (6.55), biodiversity (6.62) and intention to conserve and reflect local history (6.63) 23/05
We welcome 23/06
the target of 50% affordable housing and opportunities to rent and buy own their own homes b 23/07
ut Eynsham residents are very concerned about the definition of affordability and feel that 80% of the market value in an area like this does not make housing genuinely within reach. 23/08

****Could you please reply very briefly to confirm that you have received my message and will take account of it? Many thanks.****

Graham Griffiths, [REDACTED]

Hanborough Parish Council response to Consultation for WODC Area Action Plan for Salt Cross Garden Village (August-October 2020)

In its comments, Hanborough Parish Council wishes to focus on the impact that the proposed Garden Village will have on the Parish of Hanborough, in terms of both possible benefits and of the detrimental effects it could have on the Parish's infrastructure.

24/01

CHOICE OF SITE FOR COTSWOLD GARDEN VILLAGE

For the establishment of a Strategic Location for Growth (SLG), WOLP 2031 presents two related principles that the setting of the Cotswold Garden Village in north Eynsham must be able to provide:

24/02

- 1 *A wide range of local jobs in the Garden Village within easy commuting distance of homes (GV Principle 5)*

Create a major long-term employment opportunity that capitalises on the strategic location, and a new rural service centre supplementing Eynsham's role (WOLP 9.5.45)

- 2 *Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport (WOLP 9.5.44 and GV Principle 9)*

Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport. (Policy T1)

WOLP 2031 Policies 7 and 9 indicate how the provision of a reliable highway network has the potential to unlock and support the growth of the local economy, and that Eynsham was chosen for its important role in the economy of West Oxfordshire:

This area is an important source of employment providing around 25% of the District's total number of job opportunities. Eynsham in particular is an important location for business. • There are very strong linkages with Oxford, with a high proportion of residents working in the city and much of the economic activity forming part of the wider Oxford city region economy.

AAP Chapter 9, Enterprise, Innovation and Productivity states:

Eynsham represents one of West Oxfordshire's most significant business locations due, in part, to its close proximity to Oxford and good connections, including the A40 and Hanborough Station which provides a direct service to Oxford and London Paddington. It already accommodates a cluster of high-tech and advanced manufacturing businesses with potential for strong levels of future growth. (AAP 9.1)

24/03

It details the strength of West Oxfordshire's industrial market, and claims that the proposed science and technology park in the CGV 'will help the County as a whole remain at the forefront of innovative technologies across a number of leading sectors.'(9.12) 'This is in turn will contribute to the wider growth of the Oxford-Milton Keynes-Cambridge corridor which has been identified as a nationally significant location for future housing and employment growth by the Government.' (AAP 9.13)

An independent report to WODC concluded that 'the garden village site represents an appropriate strategic location for a science/technology park.' AAP 9.14)

PROBLEMS OF A40 AND TRAFFIC CONGESTION IN SURROUNDING AREAS

24/04

Parts of the District also suffer to an extent from congestion and strategic accessibility which needs to be tackled through a range of initiatives to unlock future economic growth. (AAP, 9.3)

The A40 is severely congested, particularly at peak times between Witney and the Wolvercote Roundabout, for the relief and improvement of which LTP4 funding has been obtained for work between Witney and Wolvercote Roundabout, in Oxford. A40 congestion exacerbates congestion on adjacent roads, notably on the A4095, the main thoroughfare through Hanborough, particularly during the extended peak hours, which serves as an alternative route to the A40, by linking the dual carriage routes of the A44 and A34 to the A40 at Witney (AAP 8.54).

Already in Hanborough vehicle traffic on the A4095 heading to or leaving Hanborough Station plays a large part in contributing to the congestion on roads in Hanborough, and this is likely to worsen considerably with the proposed development of the Station as the transport hub for West and North Oxfordshire.

CONNECTION OF LOWER ROAD TO COTSWOLD GARDEN VILLAGE

The advantage of the proximity of the Station to the location and future economic realisation of Cotswold Garden Village are indicated at WOLP 9.5.56, WOLP Policy EW1, and AAP 9.1, where the proposed development of Hanborough Station and that of the Cotswold Garden Village are seen as mutually beneficial. The Station will provide transport connections to businesses in the Village, and residents will have access to fast trains serving Oxford, Reading, London, and to Didcot, and the South West and West, and to Oxford Science Park. AAP 8.33 and Station Masterplan.

24/05

1 Provision of Cycle/Pedestrian Route

OCC and WODC are strongly promoting, as sustainable travel, active and healthy travel strategies that include walking and cycling. WOLP 2031 states the opportunity for dedicated cyclist provision between the Garden Village and Hanborough Station (9.5.57 and Policy EW1).

AAP (8.21) requires a segregated cycle route:

Improving active and healthy travel connections to Hanborough Station, in particular a cycle and pedestrian link, presents an opportunity to optimise the outcome from proposed investment in the station and extra rail services whilst encouraging a modal shift from cars, thereby reducing pressure on the surrounding road network. The current cycle route via Lower Road prioritises cars and is thus unsafe and unattractive for cyclists and pedestrians. Improvements to this route must be funded by Salt Cross developers through the provision of a segregated cycle route and footway on the western side of Lower Road, designed to encourage greater use.

Policy 14, Active and Healthy Travel:

Segregated cycle and pedestrian provision via Lower Road to Hanborough Station shall be provided, with segregated facilities for cyclists and pedestrians also the preference within the Garden Village.

More seriously, there are only two occasions where the word ‘disabled’ is used in the whole AAP, one for children’s play areas, the second for streets within Salt Cross. The Infrastructure Delivery Plan (IDP) lists the Policy at 5.6.47, but neither AAP nor IDP mention the requirement elsewhere and do not stipulate any design.

2 Design and use of cycle route

24/06

Given the obvious importance of the design within a policy of Active and Healthy Travel, Hanborough Parish Council would have expected reference to the Government Transport Note Cycle infrastructure design (LTN1/20) Guidance for local authorities on designing high-quality, safe cycle infrastructure, 2020, which establishes new standards for cycling. This is particularly important given that the proposal submitted in the Application, OGV Transport Assessment (9.5.4-9.5.12) contains a number of errors, which make it unsuitable for segregated cycle and pedestrian route on Lower Road.

The AAP fails to mention or require provision of a route that can be used by the disabled.

The AAP and IDP do not address the issue of how many users there will be of the cycle route and at what times, and this will determine the design. Although it is accepted that the car will continue to be the major means of travelling since this is a rural community,

as a predominantly rural area, the private car will remain the dominant form of transport in West Oxfordshire (WOLP 7.4)

there is no indication of how many cyclists would be regularly using the route, or of where they are going. Given the walking and cycling ethos of the CGV, it would seem that the AAP is expecting it to be densely used, both for access to the Station and for leisure to the neighbouring countryside by linking up with bridleway, other cycling paths and Sustrans routes. A cycle route on Lower Road will obviously provide safe access for cyclists from Hanborough, including possibly pupils for Bartholomew’s School, but also those from North and West Oxfordshire.

In the possible absence of a regular bus service between the CGV, and the CGV Park and Ride on the A40, there are also likely to be cyclists going to the Station from the CGV Park and Ride.

The AAP must include data for the expected use of the Cycle Route, which will determine its design

3 Connection of Cycle Route to Station

24/07

The Application Transport Assessment (9.5.4-9.5.12) proposes a dangerous passage for the cycle route directing cyclists from a segregated path onto the carriageway under the railway bridge at the north end of Lower Road, thereby obliging them to share the road with vehicles, including HGVs, average width 3.1m. The road at this point narrows from 6m to 3.8m, dips under the bridge, turns slightly and there are no pavements. At the exit from the carriageway under the bridge the cyclist would be able to re-join a segregated cycle path, and at the junction with the A4095 turn left to reach the Station entrance.

There is no reference as to whether or how pedestrians using the cycle route would travel under the railway bridge.

However, and also not noted by the AAP there is no cycle path to the Station from the junction – only a very narrow pavement on the north side of the road that is not suitable for cyclists.

The Applicant makes no mention of a possible cycle route to the Station from Lower Road to the south of the bridge, which would avoid the dangerous passage for cyclists, and possibly pedestrians, travelling under the bridge.

This is a particular omission since WOLP 9.5.57 indicates:

Similarly, there is an opportunity to enhance connections to the station by road including the possibility of a southern access point from Lower Road being provided. All of these measures would make a significant contribution towards encouraging residents of the Garden Village to use Hanborough Station for journeys by rail.

Again, the AAP fails to recognise the dangers of a route under the railway bridge by simply commenting Policy 15:

Connections to Hanborough Station must be significantly improved and take account of the Masterplan being developed for the station. Consideration must be given to a new entrance from Lower Road south of the railway, with a focus on bus, pedestrian and cycling accessibility. (underlining by HPC)

There is no reference to an entrance south of the railway bridge in the IDP

The recommendation of 'consideration' in the AAP and the lack of comment in the IDP totally fail to show that there has been any investigation or recognition of the obvious danger of obliging cyclists, and pedestrians, to move from a segregated cycle path to a carriageway, 3.8 wide, without pavements, facing on-coming traffic including HGVs.

If AAP 8.21 comments '*The current cycle route via Lower Road prioritises cars and is thus unsafe and unattractive for cyclists and pedestrians*', then it is extremely difficult to know how possibly novice cyclists from CGV could be encouraged to use a cycle route that incorporates such a dangerous aspect.

4 Conversion of PRoW to Greenway and Bridlepath between CGV to Church Hanborough

24/08

8.22 refers to improvement of the PRoW through Church Hanborough. The Parish Council would support this as a supplementary cycle route from the CGV. However, on reaching Church Hanborough, the route would not be able to continue as a cycle path, since there is no cycle path in Church Hanborough or pavements, and the road bends frequently impeding visibility of cyclists by motorists. For this path to be viable, pavement must be provided in Church Hanborough.

5 Funding of Lower Road Cycle/Pedestrian Route Improvements

24/09

While AAP 8.21 states that improvements to the cycle/pedestrian route must be funded by the Salt Cross developers, and Policy 14 only states that segregated cycle and pedestrian provision via Lower Road to Hanborough Station shall be provided and does not state by whom. It is not included in the Policy 14 list of S106 planning obligations on p.136. However, the B4044, even though, specifically excluded from the A40 Smart Corridor HIF bid, is still considered part of the A40 Strategy for improvements for which funding is being sought.

Funding for Lower Road is not included in Policy 15 although the Salt Cross developers are required to contribute to the North Cotswold Line Transformation, p.140, of which, however the Lower Road is not a part. Reference to funding for Lower Road is also not included in Policy 17.

There is no reference to funding for Lower Road in the LDP, although the case for B4044 is made.

Hanborough Parish Council believes that a satisfactory case is not being made for the improvements and provision of cycle route on Lower Road, which significantly will provide access from the CGV and developments on the A40 corridor to the West and North Oxfordshire Transport Hub, while funding bids for the B4044 to Botley and West Oxford are being actively considered as part of the A40 improvement scheme. The 'close proximity' of Hanborough Station is cited at AAP 9.1 as being a significant factor in the development of economic growth in the area.

It is not sufficient for the AAP simply to state that the Salt Way developers are responsible for improvements and provision of the Cycle/pedestrian route without giving details on how and when financial provision will be made by the developers.

As recommended at AAP 8.22, Lower Road and the B4044 should now be considered as one project, the excellent opportunity extending the cycling corridor from Hanborough continuously to Botley via the B4044. They must not be treated as two separate improvement schemes, one being given priority for historical reasons of campaigning.

6 Schedule of provision of Cycle Route

24/10

AAP Policy 17 requires that no homes in CGV will use cars until the A40 Improvements are completed. This will result in such homeowners cycling, and therefore the AAP must also require that the installation of the Cycle Route along Lower Road is a priority and must be built before any homes are available. The current conditions on Lower Road are too dangerous for cycling, and residents must not be encouraged to cycle along Lower Road until a cycle path is installed

7 Speed limit on Lower Road

24/11

The existing speed limit is the National Unrestricted Limit for a single carriageway, but the AAP fails to recognise that safe and attractive cycling conditions would not be provided for cyclists with the maintenance of that speed limit.

It is not clear why AAP retains this speed limit for Lower Road, with a segregated cyclist and pedestrian route, that is intended as an attractive path to encourage cycling, while Policy 14 and IDP 5.6.42 recommend:

The speed limit along the A40 in the vicinity of Eynsham will be reduced from the National Speed Limit to a maximum of 50 mph.

Since much of this area will be dual carriageway, why is the speed limit to be reduced to 50mph, whereas that on an unlit single carriageway rural, and winding road kept at the National Speed Limit. Given the conditions, and its heavy use by aggregate HGVs, it should be reduced to at most 50mph, preferably 40mph to provide reassurance to cyclists on the segregated cycle path.

8 Vehicle access and use of Lower Road

24/12

The closure of Cuckoo Lane to through traffic will end its use as a 'rat run' between the A40 and Freeland the A4095. However, because of the heavy congestion on the A40 into Oxford, which is likely to continue even after the improvements to the A40 Corridor, **the 'rat run' will simply move over one road, to Lower Road.**

The Lower Road in running from the A40 at Eynsham Roundabout connects with the A4095, which leads to the A44, a dual carriageway that links to the A34, which links to the M40 to the north, and to Winchester to the south. It is unlikely that the improvements to the A40 will ensure the traffic movement provided by the A44.

AAP (8.28-8.32) indicates the provision of buses for the Station from the CGV using Lower Road, with a turning area within the Station car-park. The average width of a bus is 2.6m, which may pose problems for their passage under the railway bridge. See next paragraph.

Lower Road is already currently heavily used by aggregate HGVs travelling between Bletchington and Stanton Harcourt on the B4449. The traffic is unsuitable for an unlit single carriageway, which at the railway bridge reduces from 6m to 3.8m in width, allowing very narrow passage for trucks of average width of 3.1m, and will be provided with a cycle/pedestrian path.

Hanborough Parish Council requests that the trucks are diverted from Lower Road and travel instead by the A34 to the A40 and B4449 at Eynsham, to provide the required safety for cyclists using Lower Road.

Similarly, HPC requests that construction traffic for the development of CGV are restricted from travelling from that part of Lower Road that runs through Hanborough.

9 Impact of Spine road through CGV from A40 to Lower Road and A40 improvements

24/13

Application 20/01734/OUT shows a spine road from a proposed roundabout on the A40 to the west of Eynsham running through the top of the site and linking to the Priority Access on Lower Road. The Application includes proposals for Road Management (DAS, Site-wide Design Code 4.132), which would prevent it from being a rat-run, in either direction, between the Lower Road and A40, and for the Spine Road, in not being a continuous route, except for buses, to provide access to/exit from different neighbourhoods, even possibly for residents only.

For the AAP 8.59-8.60, the spine road is to ensure that the benefits arising from the improvements to the A40 and the installation of a roundabout to the west of Eynsham are not undermined by local requirements for the CGV and that local vehicle trips can take place within CGV. Such a spine road would run from west of the Park and Ride on the A40 to a new eastern access junction on Lower Road (AAP Policy 17). AAP Policy 14 is concerned that It is important to ensure that the spine road does not lead to severance and divide the Garden Village', and that 20mph speed limit is introduced through the whole village

In the interim, the spine road must allow through traffic but be designed in such a way as to discourage rat running.

However, as proposed by AAP, even at 20mph the Spine Road will bring, even encourage, diversions from the A40 onto Lower Road access/exit junction bringing all forms of traffic, private, delivery, commercial and construction, much of which will turn north for Hanborough.

Hanborough Parish Council requires that the AAP is as much concerned about the impact of such traffic on the local network and surrounding villages and towns as on CGV itself.

AAP 8.62 requires

24/14

In addition, Construction Logistics Plans (CLPs) must be developed to limit the impact of additional traffic from Garden Village construction vehicles on the road network. Construction works for Salt Cross must be co-ordinated with delivery of the A40 Corridor improvements and other major development sites, to minimise disruption on the A40 and other routes.

This is presented in Policy 17 as

All planning applications submitted for the Garden Village must include a Construction & Logistics Plan in order to minimise and mitigate the impact of construction traffic.

All commercial uses at the Garden Village must be supported by a Delivery and Servicing Plan to reduce and mitigate the impact of deliveries on the local road network e.g. through freight consolidation. This must be submitted and agreed as part of the full planning application. For residential areas, deliveries and servicing must be covered within the Travel Plan, with appropriate targets set. Planning conditions/ planning obligations will be used to secure the measures.

AAP must take the strongest measures to ensure that all traffic involved in the construction and subsequent functioning of the CGV do not impact on the infrastructure, health and safety of local communities, villages and towns. The process of constructing the CGV will not bring benefits to the local network but are likely to cause considerable congestion and possibly pollution.

AAP (8.59) may not wish for the benefits arising from the improvements to the A40 Corridor improvements to be undermined by access arrangements for the CGV but preserving those benefits cannot and must not be at the expenses of the surrounding local network and communities. It is not sufficient for the AAP to comment (8.58)

that the development at Salt Cross will have an impact on the A40 and surrounding routes and that there will be remaining problems on the network during peak periods
and imply that this will be dealt with by

the mode shift that will take place as a result of Connecting Oxford proposals and the HIF proposals

The Connecting Oxford and HIF proposals do not include Lower Road or other roads in Hanborough, so Hanborough will be left with remaining problems but not be part of the or any strategy to resolve them.

The AAP must include a strategy for resolving the traffic issues that will arise from the development and presence of the CGV in the SLG site.

The Spine Road is not included in the Delivery phases in the IDP, which cover only improvements to the A40 and B4044. The AAP and IDP do not indicate at what stage of the development the Spine Road from the A40 to Lower Road will be constructed as a through route; whether it would be built in stretches according to requirements of particular stages of the development; whether it is initially planned as a route for construction vehicles and then adjusted for commercial and residential use.

By its access onto Lower Road, the Spine Road will significantly alter and impact on the traffic movement within Hanborough, and measures must be taken in advance of its use to minimise the impact on Hanborough.

10 Signalisation at Lower Road/ A4095 junction

24/15

Hanborough Parish Council were astonished to learn first of these proposals from the Application, having not be previously advised or consulted about them. The AAP includes signalisation in AAP Policy 17 as

- *Signalisation of the A4095/ Lower Road junction.*

but does not accompany the Policy with any justification or commentary, and, further, without consulting or advising the HPC, or producing evidence for the Policy.

The Application includes the design for the Signalisation in the Transport Assessment, Appendix Q, but there is no such information in the AAP.

HPC is baffled how it is possible to propose a significant change to the transport infrastructure of a neighbouring Parish without having first consulted its Council.

CONCLUSION

Hanborough Parish Council is very disturbed by the amount of traffic that the development and location of the CGV will bring to Hanborough.

24/16

While the Parish would welcome a safe cycle route on Lower Road between Eynsham and Hanborough, the AAP has not indicated a safe route, and the request that 'consideration must be given' (AAP Policy 15) has no force or weight at all. The AAP may require a safe route but it does not establish the conditions for safeguarding its users, by failing to

restrict the speed limit on the adjacent highway; by not rejecting a route under the railway bridge; by not restricting construction and aggregate lorries from travelling along Lower Road; by not producing data about how many and which cyclists would use the path; by adding more road junctions along Lower Road.

To the contrary, the inclusion of a proposal for signalisation at Lower Road (Policy 17) seems to endorse the existing function and infrastructure of the road, albeit with a slight modification, presumably to benefit vehicles from CGV exiting from Lower Road.

The A4095 already bears a brunt of traffic diverting from the A40 to reach the A44 and Oxford, and this will increase during the improvement works to the A40. However, the AAP (8.58) accepts that the improvements will not resolve all traffic problems and that they will continue. The A40 improvement programme may actually attract more traffic to the A40 rather than lessen it, and this could result in more traffic passing through Hanborough as a 'rat run'.

The development of Hanborough Station as the transport hub for West and North Oxfordshire and which is so important for the future success of the CGV, will transform the infrastructure of Hanborough by passengers 'heading for' a station providing fast access to Reading, London, the South West and West, and Oxford science parks.

What is obvious is that Hanborough will be sustaining heavy traffic on not only the A4095 but as a consequence of the CGV on Lower Road. Both Hanborough's road arteries, the A4095, along the northern boundary of the Parish, and Lower Road, along the eastern boundary, will be congested at peak hours, impacting severely on the community of Hanborough between them on its life, its movement, its air. Such an impact will urbanise a rural community.

Whatever the benefits that CGV will bring Eynsham, West Oxfordshire and the County's economy, for Hanborough there will be only that of a cycle path on Lower Road, with potential better access to Oxford.

The purpose of the AAP is surely to ensure that the success of the Cotswold Garden Village is not at the expense of neighbouring localities and communities. Hanborough Parish Council believes the Local Authority's consultants have thus far fallen short of this and trusts that WODC will produce a revised plan that can be shown to benefit the whole area.

From: Strongitharm, Glen [REDACTED]
Sent: 13 October 2020 15:09
To: Planning Policy (WODC)
Cc: Blake, Patrick; Ginn, Beata; Townend, Zoe; Planning SE
Subject: Re: #11133 - West Oxfordshire District Council - Salt Cross Garden Village - Area Action Plan Consultation

Our Reference: 11133

FAO: Planning Policy Team

West Oxfordshire District Council - Salt Cross Garden Village - Area Action Plan Consultation

Thank you for inviting Highways England to respond to the surveys within the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. 25/01

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34 and in particular for this consultation the A34 Peartree Interchange.

We have reviewed this consultation and the supporting information which advises that the Salt Cross garden village will make a major contribution towards homes and jobs in a high quality living environment. It will unlock funds to improve infrastructure and boost the case for improvements to local transport links, including upgrades to the A40.

However, of significant concern to Highways England is that all of the future garden village traffic that is predicted to use the A40 to get to the A34 will need to pass through the significantly congested Wolvercote junction and this traffic is likely to result in additional queueing traffic blocking back into the A34 Peartree Interchange. This could potentially result in longer queues on the A34 Slip roads/mainline and increase the safety risks to those queueing vehicles unless the necessary and appropriate package of mitigation measures is identified and agreed in consultation with Highways England. 25/01 cont.

Our review of the transport evidence has identified that the existing VISSIM Model that has been used to form the base model and the future 2031 model which has assessed the proposals has excluded the Wolvercote Roundabout junction, the A34 Peartree Interchange and the Loop Farm Roundabout. We note that within the *Eynsham Area Infrastructure Delivery Plan, Updated Draft Report* (dated July 2020) it is stated in the first bullet point under paragraph 5.6.20 that “*Additional modelling work was also undertaken by Capita, focussing on the Wolvercote and Pear Tree area.*” However, that modelling does not appear to be provided within this consultation so we are unable to review or provide comments on the traffic impact of the proposed garden village on the Wolvercote Roundabout junction, the A34 Peartree Interchange and the Loop Farm Roundabout or what, if any,

mitigation measures are being put forwards at these junctions. Without this information we cannot confirm if the mitigation package identified is sufficient to ensure the continued safe and efficient operation of the A34.

We hope this helpful and welcome continued engagement as the Salt Cross Garden Village proposal progresses.

Kind Regards,
Glen

Glen Strongitharm

Assistant Spatial Planner (Area 3 & 5)

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: www.highwaysengland.co.uk

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Historic England

By email only to: planning.policy@westoxon.gov.uk

Our ref: PL00713882

Your ref:

Main: 020 7973 3700

Direct: [REDACTED]

e-seast@historicengland.org.uk
[REDACTED]

Date: 23/10/2020

Dear Mr Hargraves

Salt Cross Garden Village Area Action Plan Pre-submission Draft

Thank you for inviting Historic England to comment on the above document. In line with our remit, and the stage of the plan consultation, our comments are limited to matters relating to the historic environment, in respect of soundness and legal compliance. We note that an outline planning application has been submitted and is currently being considered by the council.

We do not wish to object to the plan on the basis of soundness or legal compliance.

Historic England has been consulted at the relevant plan-making stages and we consider that our representations have been duly considered by the council.

Through the plan-making process, a number of heritage assets that have been identified that could be affected by development in the AAP area, (including, for example, *"the possible Tilgarsley medieval deserted village and its hollow way and earthwork remains could potentially be of high value, although not currently designated, and may require preservation in-situ"*)¹. However, we consider that sufficient policy protections exist, in this plan, in combination with the local plan and national policy, to ensure that the historic environment is appropriately protected.

26/01

To confirm, I do not wish to participate in the hearing session(s).

Yours sincerely

Edward Winter

Historic Environment Planning Adviser

¹ AAP para 7.147





Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

Name of the Document to which
this representation relates:

Pre-submission draft August 2020

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

By Post: Planning Policy,
West Oxfordshire District Council,
Elmfield,
New Yatt Road,
Witney,
Oxon.
OX28 1PB

Or by Email: planning.policy@westoxon.gov.uk

This form has two parts-

PART A – Personal Details

PART B – Your Representation(s).

Please fill in a separate sheet for each representation you wish to make

PART A

1. Personal Details

2. Agent's Details (If applicable)

Title	Mr	
First Name	Stuart	
Last Name	Garnett	
Job Title	Planning Director	
Organisation	Inspired Villages	
Address Line 1	The Stanley Building	
Line 2	7 Pancras Square	
Line 3	London	
Line 4		
Post Code	N1C 4AG	
Telephone Number		
Email Address		k



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

PART B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input type="text" value="10.12"/>	Policy	<input type="text" value="22"/>	Policies Map	<input type="text"/>
-----------	------------------------------------	--------	---------------------------------	--------------	----------------------

4. Do you consider the Area Action Plan is:

- | | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the
Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

27/01

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy 22 is not positively prepared, justified, effective nor consistent with national policy.

Policy 22 talks of a commitment to accelerating housing delivery but para 10.12 acknowledges Local Plan delivery trajectory will not be achieved. In terms of older persons housing, we have identified that current provision for extra care (for sale) in the ENTIRE DISTRICT is only 59 units, with 204 extra care (affordable units). There is a substantial shortfall in the level of provision needed to achieve an adequate supply for older homeowners wishing to maintain their tenure when transferring to specialised accommodation. There is an immediate requirement for a further +283 extra care (for sale) units to provide a supply of 342 units, rising to a further +472 units by 2035 to provide a supply of 531 units.

The Salt Cross Garden Village will not begin to deliver residential units until at least 2024/25 and high levels of delivery (200+ units per annum) until 2026/27 - at the very end of the plan period. Having regard to the current significant shortfall of extra care (for sale) units which is going to worsen by 2035, the AAP fails to meet national planning guidance which identified the need to meet housing for older people as critical (Para: 001 Reference ID: 63-001-20190626). The Local Plan has failed to meet the identified needs and this will be compounded by the AAP. The AAP fails to identify when the specialist housing for older people, including extra care will be delivered within the trajectory.



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

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6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The trajectory (10.1) and supporting text should be updated to clarify when specific land uses are anticipated to be delivered. Notwithstanding our fundamental concerns about the very low extra care housing figures identified in Policy 26 (see separate representations) and the district wide lack of supply for this form of accommodation, clarity on the trajectory will provide some acknowledgment by the Council of the critical need for older persons' accommodation as set out in national planning guidance; will identify whether this form of accommodation will be deliverable over the plan period (to 2031) and incorporate delivery into the overall strategy.

27/01
cont.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Inspired Villages is a leading developer/operator of retirement communities (extra care) in the UK with six existing operational villages, two more under construction and a further four due to commence construction in 2021. With an ambition, backed by Legal & General to have 60 operating villages by 2030 we are experts in the sector and with a nationwide remit believe we are well placed to highlight how the AAP is not positively prepared, not justified, not effective nor consistent with national policy to meet the significant unmet needs for older peoples' housing and which is identified in national planning guidance as being 'critical'.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Stuart Garnett

Date

23/10/2020



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

Name of the Document to which
this representation relates:

Pre-submission draft August 2020

Please Return to West Oxfordshire District Council by 5pm, Friday 23 October 2020

By Post: Planning Policy,
West Oxfordshire District Council,
Elmfield,
New Yatt Road,
Witney,
Oxon.
OX28 1PB

Or by Email: planning.policy@westoxon.gov.uk

This form has two parts-

PART A – Personal Details

PART B – Your Representation(s).

Please fill in a separate sheet for each representation you wish to make

PART A

1. Personal Details

2. Agent's Details (If applicable)

Title	Mr	
First Name	Stuart	
Last Name	Garnett	
Job Title	Planning Director	
Organisation	Inspired Villages	
Address Line 1	The Stanley Building	
Line 2	7 Pancras Square	
Line 3	London	
Line 4		
Post Code	N1C 4AG	
Telephone Number		
Email Address		



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

PART B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="26"/>	Policies Map	<input type="text"/>
-----------	----------------------	--------	---------------------------------	--------------	----------------------

4. Do you consider the Area Action Plan is:

- | | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| 4. (1) Legally Compliant | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4. (3) Complies with the
Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

5. Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy 26 is not positively prepared, justified, effective or consistent with national policy.

Policy 24 (Build to Rent) states that to accord with the default requirement in national policy/guidance affordable housing is set at 20%. NPPF para 64 sets out exemptions to the 10% affordable home ownership requirement including build to rent AND specialist accommodation for the elderly. Local Plan policy H3 seeks 45% affordable housing on extra care developments (C2 use class), despite such levels being unviable having regard to: levels of non saleable space (typically c20-25%); funding, staffing, the long-term operation, management and ownership; provision, maintenance, upkeep and management of the significant communal facilities all of which are not considerations of traditional residential developments (C3 use class).

Para 10.90 suggests the specialist housing provision at Salt Cross would include 147 units of housing-with-support (i.e. retirement/sheltered housing - typically within the C3 use class); 'up to' 42 housing-with-care units (i.e. extra care housing) and 70 care home bedspaces.

We object to policy 26 and its supporting text for the following reasons:
- the housing with care figure is expressed as an 'up to' figure when the overall headline figure of 2,200 units in the Garden Village is not expressed in the same way. (see separate sheet for rest of our representations)

27/02



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

(For Official Use Only)

6. Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The evidence base must be properly reviewed to identify how Salt Cross will better serve to meet the identified needs for housing for older people as this is not set out in the policy or supporting text.

There must be an increase in the quantum of private extra care on-site and which must come forward early in the site's delivery to address the identified unmet need. In any event, the shortfall is so significant in the district that other sites will need to come forward in the district along with any development at Salt Cross to address this need. There must be a recognition that the levels of affordable housing would render development unviable and will result in development not being delivered. It is accepted that the Local Plan policy has created that framework but it will be acknowledged by the Council that there has been a failure with a lack of supply of new extra care developments since the plan's adoption. Furthermore, that Local Plan policy is incorrectly skewed towards affordable home provision when the majority tenure in older people is home ownership. The AAP can seek to redress this discrepancy and this can be justified through the Council's evidence base.

The supporting text and policy as drafted lacks flexibility and must be revised. Para 10.90 must be modified to reflect the needs on a district wide basis rather than Salt Cross merely serving its very local needs of Eynsham because this is contradicted by the general distribution approach to the 2,200 homes overall.

It is noted that in other policies, for example, Policy 25 which states that "at least 5% of the total number of homes" should be set aside for custom and self-build housing. However, there is no such approach for Policy 26 to require an 'at least' amount of specialist housing and Policy 26 should be updated accordingly to plan for a meaningful level of specialist housing at Salt Cross.

That the need for older persons housing is urgent and unmet, there is a need for other sites to come forward in the short term whilst implementation of Salt Cross occurs because the Inspector will acknowledge such delivery of any extra care would not occur until, at the earliest, the very end of the current plan period.

27/02
cont.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.



Salt Cross Garden Village Area Action Plan

Publication Stage Representation Form

REF:

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7. If your representation is seeking a modification to the AAP, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Inspired Villages is a leading developer/operator of retirement communities (extra care) in the UK with six existing operational villages, two more under construction and a further four due to commence construction in 2021. With an ambition, backed by Legal & General to have 60 operating villages by 2030 we are experts in the sector and with a nationwide remit believe we are well placed to highlight how the AAP is not positively prepared, not justified, not effective nor consistent with national policy to meet the significant unmet needs for older peoples' housing and which is identified in national planning guidance as being 'critical'.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

Stuart Garnett

Date

23/10/2020



Oxfordshire Market Position Statement 2019 - 2022



Foreword

Thank you for taking the time to read this Market Position Statement for care services in Oxfordshire. It is aimed at existing and potential providers of care homes, home support, mental health services, Extra Care Housing, Supported Living, employment and daytime opportunities, and any other care services.

This document has been co-produced with care providers and people that use services and is being jointly published by Oxfordshire County Council and Oxfordshire Clinical Commissioning Group. We recognise that Oxfordshire's care market is essential for providing both health and social care. We intend to engage with our care providers across all services to ensure Oxfordshire's population has access to a wide range of good value, high quality and innovative services.

We strongly believe that the challenge presented by Oxfordshire's ageing population coupled with reductions in the availability of public funding, will be best met by further collaborative working between local authorities, NHS, providers of health and social care services, people who access services, and their families. Together we can tackle the challenges we face to enable better outcomes for everyone.

We hope you find the information contained here useful and look forward to developing a successful working relationship that supports the people of Oxfordshire.



A handwritten signature in black ink, appearing to read 'Ian Hudspeth', with a long horizontal flourish underneath.

Councillor Ian Hudspeth

Leader – Oxfordshire County Council

Chair – Oxfordshire Health & Wellbeing Board



A handwritten signature in black ink, appearing to read 'K. Collison', with a long horizontal flourish underneath.

Dr Kiren Collison

Clinical Chair – Oxfordshire Clinical Commissioning Group

Vice Chair – Oxfordshire Health & Wellbeing Board

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1. Introduction

This document sets out our commissioning intentions for care and support, and accommodation-based services. It also identifies what we see as our key pressures in adult social care and how we aim to address some of these issues.

Published in the summer of 2019 to cover the period 2019-22, this document will be reviewed periodically to ensure the information contained in it is relevant and up to date. It will, for example, be updated upon publication of the Adults with Care & Support Needs Strategy which is currently under development.

This document is set out in service specific sections which describe the current demand and capacity alongside our future requirements and commissioning intentions.

Included as an annex is a high-level needs analysis which provides key countywide statistics about our population, as well as links to other key sources of information.

We welcome your feedback on this market position statement. Please see the feedback section at the end of this document.

1.1 Why have we published a Market Position Statement?

Under the Care Act 2014, the Council has a statutory duty to provide care and support for people with eligible needs. The Act also places a duty on the Council to maintain an efficient and effective care market for the population of Oxfordshire, including people funding their own care.

The aim of a Market Position Statement is to bring together information and analysis about the local market so that current and prospective providers understand the local context, what is likely to change and where opportunities might arise in the future.

It is designed to help providers shape their business plans to support the Council's vision for the future of local public health, social care and specialist housing provision. It also helps providers to identify opportunities they may tender for and how they might best develop services to meet local need and demand.

1.2 Key features

This Market Position Statement:

- Presents a picture of demand and supply now, what that might look like in the future and how local health and social care commissioners will support and intervene in the market to deliver this vision
- Supports this analysis with statistics from various sources
- Presents data that informs the market and helps providers with their business planning
- Covers all current and potential future users of services, whether they receive funding through the local authority or self-fund their care

1.3 Who is this Market Position Statement for?

The statement can be read by anyone but is specifically aimed at:

- Existing providers of health and social care services in Oxfordshire
- Service providers and organisations not currently delivering services in Oxfordshire
- Personal Assistants and micro-providers
- Community-based enterprises
- Voluntary and community organisations as well as people interested in local business development and social enterprises
- Oxfordshire residents who are interested in working with us to co-produce services



2. Our vision for Oxfordshire: What are we trying to achieve?

2.1 Oxfordshire Health & Wellbeing Board Vision

“To work together in supporting and maintaining excellent health and well-being for all the residents of Oxfordshire”

The vision for health and social care services in Oxfordshire is described in the Oxfordshire Joint Health & Wellbeing Strategy. It explains how the NHS, Local Government and Healthwatch will work together to improve the health and wellbeing of the people of Oxfordshire.

Overall health in Oxfordshire can be considered to be good when compared nationally. Residents tend to live longer than elsewhere in the UK and remain healthy into older age for longer. We have some of the leading health services and academic organisations in the country on our doorstep, and many services are highly rated by the Care Quality Commission. These positive factors give us a solid foundation on which to build local services.

Yet we face challenging times. The Oxfordshire population is growing and ageing. The number of people with chronic complex diseases is growing. Demand for all our services is increasing. House prices locally are high, over 10 times the average annual income, and this exacerbates staffing shortages. Budgets are constrained, and it is a challenge to meet all of our national targets.

Our major asset is our willingness to work together and to work with providers and people who use services to find new solutions to old problems.

We have recently reviewed our challenges and identified the following priorities:

- Agree a coordinated approach to prevention and “healthy place-shaping”, which means ensuring the physical environment, housing and social networks can nurture and encourage health and wellbeing
- Improve the resident’s journey through the health and social care system
- Work with the public to re-shape and transform services locality by locality
- Agree plans to tackle critical workforce shortages.

2.2 Adult Social Care Vision

Our vision for Adult Social Care in Oxfordshire is to deliver sustainable, good quality services which in turn lead to sustained and improved experiences for the people who access them. This will be delivered by working with the NHS, private and voluntary sector providers by using the experience of our customers and other key stakeholders to design, procure and evaluate services.

The four ambitions of Adult Social Care are to:

1. Improve the satisfaction of people who use services
2. Increase the number of people supported at home
3. Improve the quality and sustainability of care providers in Oxfordshire
4. Involve more local people and organisations in the development of services

The integration of adult social care and health is well-established in Oxfordshire and reflected in shared resources, pooled budgets and joint commissioning of services. We aim to integrate housing too, recognising that housing with care and support is essential to the safety, wellbeing and health of many older and disabled people in the county. We want to work with providers to deliver Extra Care Housing and supported housing in a way that promotes health and wellbeing and maximises independence.

2.3 Key Challenges

Demographic projections: Significant increases and an ageing population

Between 2015 and 2030, the number of people in Oxfordshire aged 85 and over is expected to increase by 95%. Over the same period there is also expected to be a 26% increase in the number of people with a learning disability. We are also experiencing a higher demand for services than you would expect from the demography.

Workforce

The health and social care system in Oxfordshire is particularly challenged by the issue of workforce (retention and recruitment) with one of the lowest levels of unemployment in the country (0.6% of people claim Job Seekers Allowance). The low level of unemployment means that there is strong competition from within the health & social care system as well as from other markets such as the retail sector.

This is particularly acute in the domiciliary care market where, despite Oxfordshire being one of the highest paying in the UK for care (av. £23.15 per hour), providers still have difficulty meeting the ongoing workforce challenge. The ongoing increase in demand in statutory services is matched by an equivalent rise in the private market (more than half of Oxfordshire residents are self-funders).

Fragile provider market

There is an increasing view that Oxfordshire's homecare market is fragile and lacking in stability. This is evidenced by the number of providers who have exited the market, with six agencies exiting the market between November 2016 and July 2018. Homecare providers have told us that recruitment challenges in particular are limiting their ability to grow and sustain their businesses.

3. Feedback

We hope you find this market position statement helpful and welcome your feedback to help inform future iterations. Please contact us at ASCstrategyteam@oxfordshire.gov.uk if you wish to submit feedback.



4. Key Contacts

The following are the leads for each service area contained within this document. If you would any further information regarding the commissioning of these services, they can be contacted at strategic.commissioning@oxfordshire.gov.uk

- **Homecare** – *Helen Wake*
- **Extra Care Housing** – *Gillian Douglas*
- **Care Homes** – *Simon Brown*
- **Supported Living for People with Learning Disabilities** – *Chris Walking*
- **Mental Health Services** – *Sarah Roberts*



5. Homecare

Good quality Homecare is a vital component of the Oxfordshire Health and Wellbeing Strategy, with the ultimate aim of enabling people to live and age well. It has a key role in ensuring people are supported to live as independently as possible for as long as possible in their own homes. It can delay the need for residential care or hospital admission by providing the right support at the right time to keep people independent for longer.

The Council and Oxfordshire Clinical Commissioning Group's ambition is to increase the take-up of services and community resources which help people to live well at home thus supporting a decrease in the number of people going into residential care when home-based options are still available.

Homecare involves providing personal care services in a person's home, it includes help to carry out day to day tasks such as washing, dressing and preparing meals. These services range from basic support through to live-in care for those people with the most complex needs.

As of July 2019, there were 108 homecare agencies registered with the Care Quality Commission in Oxfordshire.

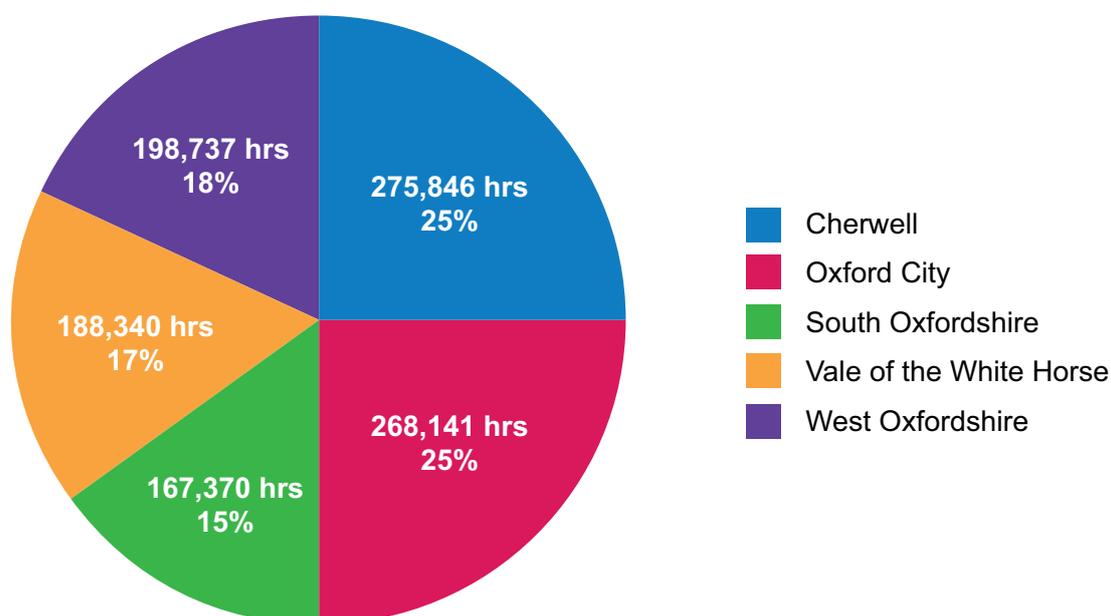
Services in Oxfordshire are good and generally rank favourably nationally:

95% of homecare providers are rated good or outstanding by the Care Quality Commission compared to 87% nationally.

5.1 Current Service Provision

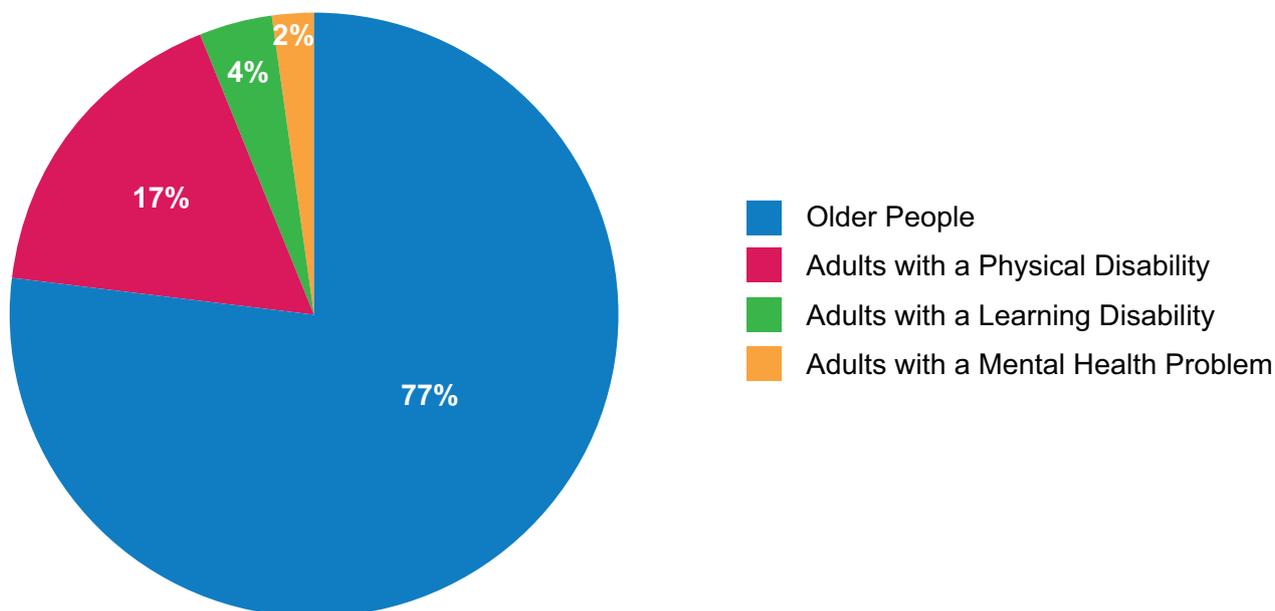
In 2018/19 the Council commissioned over one million hours of homecare. Over three quarters of this care was delivered to people over the age of 65. The chart below shows how these hours were split across the five district areas of the county.

HOURS OF HOMECARE PER YEAR



The majority of people who currently receive homecare are over the age of 65, as shown in the chart below.

PEOPLE WHO RECEIVE HOMECARE



Capacity of current market

The Council purchases homecare for adults from the independent market, buying in the region of 22,000 hours per week for approximately 2,000 people, at a cost in the region of £20m per annum.

It is estimated that the Council purchases less than 50% of the total amount of homecare services provided in Oxfordshire. The remainder is purchased by approximately 3,000 self-funders, estimated at 31,000 hours per week.

There has been a significant increase in the average number of days it takes to find and allocate a care package from 29 days in 2017 to 46 days in 2019. This means that in certain parts of the county people have to wait longer for their care to start.

The increase in the length of time to source care packages indicates a reduction in the care market's ability to be responsive, which is affecting both urban and rural areas.

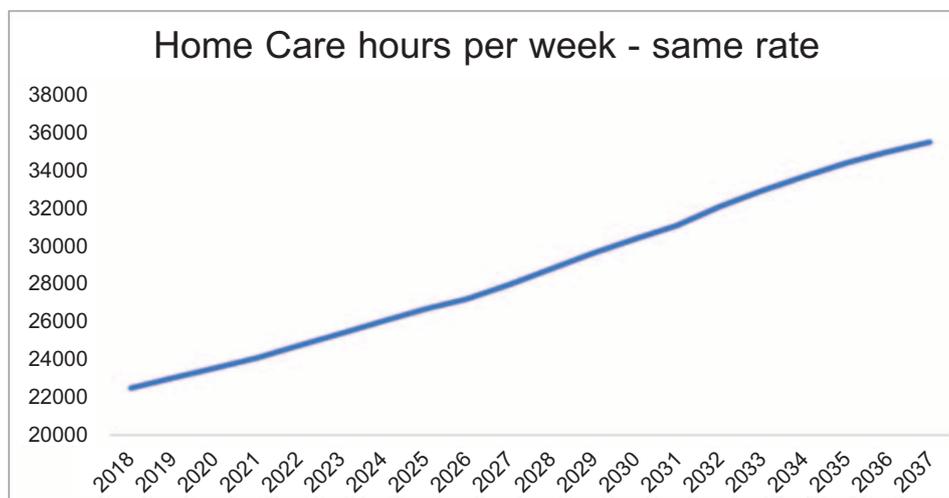
Current Contracting arrangements

We have a Help to Live at Home Framework under which seven main providers deliver 39.8% of the care we purchase. The remaining care is delivered by 74 providers who are registered on our Dynamic Approved Providers List.

Additional homecare capacity is provided in the form of short-term reablement, which is commissioned through a contract with Oxford University Hospitals NHS Foundation Trust's Home Assessment and Reablement Team. In 2017/18 the reablement service supported 1,960 people.

5.2 Future Service Provision

Given the forecasted increase in the number of people aged over 65, if we were to provide the same proportion of homecare as now – the amount of homecare would need to increase by 55% by 2037.



We also know that more people are likely to need care in the future. Recent trend analysis show that the amount of care people need in the last year of their life has doubled in the last 20 years. People are living longer, but the amount of unhealthy years is increasing.

Homecare Review

The Council is currently undertaking a review of the Homecare market, with the aim of developing a new commissioning model for homecare, which will be in place by October 2020.

We are working with providers to develop alternative models of homecare that utilise wider community assets, use strength-based approaches, employ assistive technology and provide alternatives to traditional homecare interventions. We want to develop a new business offer that:

- Delivers a stronger partnership approach with providers
- Utilises system wide capacity effectively and improves flow across health and social care
- Has a stronger focus on outcomes for people who receive care
- Delivers value for money, is financially sustainable and provides opportunities for the workforce
- Has co-production with key stakeholders at its heart

5.3 Key Messages

- We are committed to using prevention to enable people to stay healthy, independent and manage their own care
- We believe that Homecare is a vital component of the care continuum, the right care at the right time can keep people healthy and independent for longer which in turn can delay the need for residential care

- We need experienced staff to support people who are living longer, often with more complex needs
- We want to work with people who receive care, their families/carers, providers and other key stakeholders to co-produce a new model of homecare that meets people's needs, is sustainable and provides market growth
- We need to work with providers to develop a range of initiatives to support and encourage people to enter and more importantly stay working in the sector
- We need to increase the speed of package sourcing and wider capacity to meet the needs of people wherever they live in the county
- We need to focus on ensuring people leave hospital at the right time with the appropriate level of support to enable them to live at home



6. Extra Care Housing

Extra Care Housing consists of self-contained housing, primarily for older people, which offers care and support on site. It is based on an ethos of promoting independence and offering flexibility as a person's care needs change over time.

In most schemes the housing and care functions are supplied by different providers but in some cases by the same provider. The care delivered is very similar to that provided to people living in their own homes, generally referred to as homecare or domiciliary care.

There are also a number of private retirement villages in the county which offer older people an option to buy a property in an area well connected to local amenities. We encourage the development of private retirement villages as we recognise that these will suit the needs of many Oxfordshire residents. These are not however included in our definition of Extra Care Housing.

In the continuum of housing for older people we recognise that we need a range of options to meet diversity of need and give people choice. Keeping people in their own home remains our priority but where an older person has care and support needs that could be better met through specialist housing we will promote Extra Care Housing. Where care and medical needs cannot be met through Extra Care Housing then a care or nursing home is likely to be the most appropriate setting. For planning purposes Extra Care Housing equates to a Use-Class 3 Dwelling House.

We see Extra Care Housing as an essential housing option for older people with care and support needs and want to increase this provision to meet current and future needs. Our vision for Extra Care Housing is:

“A county where older people have access to high quality, affordable Extra Care Housing that is safe, inclusive, geographically spread, well-connected and integrated with local communities and where older people can access the care and support they need to thrive.”

The case for delivery of Extra Care Housing is based on achieving better health and wellbeing outcomes for older people. But there are also economic benefits with Extra Care Housing reducing the number of delayed discharges from hospital and reducing permanent admissions to care homes. If we are to make best use of the health, social care and housing system, then Extra Care Housing is an important and necessary part of the landscape.

6.1 Current Service Provision

We currently have 17 schemes that are open and advertised on our website.¹ They comprise a mixture of tenures i.e. homes for rent, shared ownership and private ownership. These schemes and the tenure mix are listed in the table below:

Scheme name	Location	Housing Provider	Care provider	Number of Units ²	Rental	Shared Ownership	Private Ownership
Orchard Meadows	Banbury	Bedfordshire Pilgrims Housing Association (BPHA)	The Orders of St. John Care Trust	40	20	20	0
Stanbridge House	Banbury	Housing 21	Housing 21	70	60	10	0
Park Gardens	Banbury	Bromford Housing Group	Radis Community Care	78	16	17	45
Centurion House	Bicester	Bedfordshire Pilgrims Housing Association (BPHA)	The Orders of St. John Care Trust	20	10	10	0
Moorside Place	Kidlington	Bedfordshire Pilgrims Housing Association (BPHA)	The Orders of St. John Care Trust	54	39	15	0
Erdington House	Yarnton	Housing 21	The Orders of St. John Care Trust	50	35	15	0
Isis Court	Oxford	Bedfordshire Pilgrims Housing Association (BPHA)	The Orders of St. John Care Trust	20	20	0	0
Greater Leys	Oxford	Cottsway Housing Association & Greensquare Group	1st HomeCare (Oxford)	156	156	0	0
Shotover View	Oxford	Bedfordshire Pilgrims Housing Association (BPHA)	The Orders of St. John Care Trust	55	37	18	0
Towse Court	Goring	South Oxfordshire Housing Association (SOHA)	The Orders of St. John Care Trust	40	31	9	0
Windmill Place	Thame	South Oxfordshire Housing Association (SOHA)	The Orders of St. John Care Trust	40	30	10	0
Millcroft	Wallingford	One Housing	One Housing Group	40	30	10	0
Nicholson House	Abingdon	Sovereign Housing Association	Optalis	60	60	0	0
Mayott House	Abingdon	Bedfordshire Pilgrims Housing Association (BPHA)	The Orders of St. John Care Trust	40	36	4	0
Petypher House	Kingston Bagpuize	South Oxfordshire Housing Association (SOHA)	The Orders of St. John Care Trust	45	16	29	0
Fernleigh	Witney	Greensquare Group	The Orders of St. John Care Trust	80	32	10	38
Paddocks Wychwood	Milton-u-Wychwood	Greensquare Group	The Orders of St. John Care Trust	44	33	11	0
Total Units				932			

¹ <https://www.oxfordshire.gov.uk/residents/social-and-health-care/adult-social-care/housing-options-and-care-homes/extra-care-housing>.

² The term unit is used to mean a flat of one or two bedrooms throughout the Extra Care Housing section of this document.

6.2 Future Service Provision

Demand

In addition to the 932 units currently open and listed above, we anticipate a further 522 units to be open by 2026 and additional 838 to follow by 2031.

We intend to develop a supply of Extra Care Housing to be available in part as an alternative to care home accommodation. We envisage a model which includes provision for people with moderate dementia as well as those with significant care needs. Care home provision will primarily be commissioned for people with nursing needs which cannot be met at home and/or significant dementia needs.

We have used population forecasts from the Office of National Statistics and the Housing Learning and Improvement Network (LIN) assessment of need for Extra Care Housing³ to estimate our future requirements⁴. This can only be a guide and not a definite prediction.

We have based our calculation on the estimated number of people aged 75, although most schemes accept people aged 55 and over, 75 is widely accepted as the 'threshold age' for entry into Extra Care Housing. The number of people aged over 75 is expected to rise considerably in Oxfordshire over the next decade.

We estimate that we need 25 'extra care units' for every 1,000 people aged 75 and over. Within this estimation we have made a small allowance for people with learning disabilities who are likely to be younger.

The table below sets out the current number of units and the additional units needed to meet estimated demand:

Date	Approximate 75+ population	Current or expected number of units	Units needed based on population	Additional Units needed above those expected
2019	60,693	932	1,518	586
2026	77,464	(+522) 1,454	1,937	483
2031	85,502	(+838) 2,292	2,138	*

* Figure dependant on achieving target set for 2026

People with Learning Disabilities and/or physical disabilities

We recognise that Extra Care Housing may well be suited to some of our Oxfordshire residents who have a learning disability, including the significant number of people who are currently living with an older carer⁵.

³ Extra Care Housing – What Is It In 2015?, Factsheet, Housing LIN, November 2015

⁴ This does not include provision for more people relocating to the county as a result of additional house building as the expected number for the age group in question is very low

⁵ 216 people are living with parents or other relatives who are aged 60 or older, including 55 people living with carers who are aged 80 or older

Some providers are successfully integrating older people who have learning disabilities into their schemes. We encourage and support this and would like to see schemes welcoming people with learning disabilities before they reach age 55.

We will include Extra Care Housing providers as part of our consultation on the new Adults with Care & Support Needs strategy.

Identifying Future Sites

There is now an extensive building programme across the county and housing providers are encouraged to source sites in line with local plans. This may be on existing sites being developed by registered providers or on Section 106⁶ sites involving partnerships between private developers, registered providers and the local authority.

Extra Care Housing needs to be integrated with local communities and be well-connected to transport and other infrastructure. For this reason most schemes are located in urban areas or market towns. However smaller schemes (minimum of 40 units) are being developed in larger villages. Site locations have to meet the needs of older and disabled people and ideally should be flat, close to public transport or shops and other local amenities⁷.

Extra Care Housing is included in the requirement for affordable housing in new developments. Each District Council has a different policy requirement regarding the percentage of affordable housing. We will work with potential providers and other partners to identify suitable sites and deliver Extra Care Housing as part of the affordable housing quota and beyond.

Any provider of Extra Care Housing will be expected to explore and maximise funding from Homes England's Care and Support Specialised Housing Fund⁸ and other possible sources. The County Council holds a capital grant fund which can be allocated to deliver new schemes where the scheme is required and would otherwise not be viable. Applications for funding need to be supported by a robust business case and will have specific requirements attached.

6.3 Key Messages

We want to:

- Work with a range of housing providers to increase the supply and diversity of Extra Care Housing to meet current and future needs
- Increase the supply of affordable Extra Care Housing, including units for social rent, through partnership working with the city and district councils, registered providers and funding partners
- Achieve a geographical spread of Extra Care Housing across the county, while ensuring that residents have good access to transport, health, leisure and other key services

⁶ Section 106 is a legal agreement between an applicant seeking planning permission and the local planning authority. A significant amount of affordable housing is delivered through S106 agreements

⁷ Site specifications are available from https://www.housinglin.org.uk/_assets/Resources/Housing/Housing_advice/Design_Principles_for_Extra_Care_July_2004.pdf

⁸ Funding Prospectus : Care and Support Specialised Housing Fund, Phase 2, February 2015, Homes and Communities Agency (now Homes England). https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/404757/CASSH_phase_2_prospectus_full.pdf

- Optimise the mix of residents benefiting from Extra Care Housing through inclusive designs that are suitable for a range of adults including those with physical disabilities, dementia, or learning disabilities
- Ensure that Extra Care Housing is reflected as a priority in planning policies and other appropriate documents such as Local Plans and Neighbourhood Plans



7. Care Homes

The Council and Oxfordshire Clinical Commissioning Group's ambitions are to ensure people are supported to live as independently and for as long as possible. We are developing a range of services to provide care at home, including Extra Care Housing which aims to provide an alternative to care home accommodation.

Our intention is to ensure that care homes are only used for people who can no longer safely remain in their own home, and primarily for those with nursing and/or specialist needs, for example dementia.

For adults of working age (under 65) with care and support needs we have developed a programme of Supported Living services to replace the use of care home placements. The vast majority of these people are cared for within Oxfordshire, however there are some cases where they are cared for in neighbouring areas and for people with the most complex needs this could be further away.

In July 2019, 88% of Care Homes in Oxfordshire had been assessed by the Care Quality Commission as being either Good or Outstanding compared to 82% nationally.

7.1 Current Service Provision

It is estimated that the Council and Clinical Commissioning Group purchase approximately 37% of all care home beds in Oxfordshire, which means that we are the largest single purchaser of care home beds in the county with a combined annual purchasing cost of just under £100m.

We operate two block contracts, one being a large, long term arrangement with the The Orders of St. John Trust which covers approximately 500 people and a smaller, more specialised contract with Vale House.

The Council operates a Dynamic Purchasing System which allows providers to register with the Council under standard purchasing terms and conditions; all contracts including block contracts are procured under this system. Currently there are 60 care homes who are allocated services through the Dynamic Purchasing System. They contribute 52% of the total number of beds purchased.

It is the Council's intention to only use providers who are registered on the Dynamic Purchasing System and to purchase most of its requirements through block contracts.

Occupancy

Care home occupancy levels are critical to the financial viability of care home providers. 90 of the 108 care homes where we place older people in Oxfordshire had an occupancy rate of 80% or higher. The level of occupancy across the county varies.

District Area	% Occupied
Cherwell	85%
Oxford City	87%
South Oxfordshire	91%
Vale of the White Horse	90%
West Oxfordshire	85%

On 1 March 2019, there were 2285 people registered as being funded by either the Council or the Clinical Commissioning Group's Continuing Healthcare Fund (CHC), this represents a reduction of 10.5% since September 2017.

The Clinical Commissioning Group uses Funded Nursing Care (FNC) to support a further 815 people who self-fund their care.

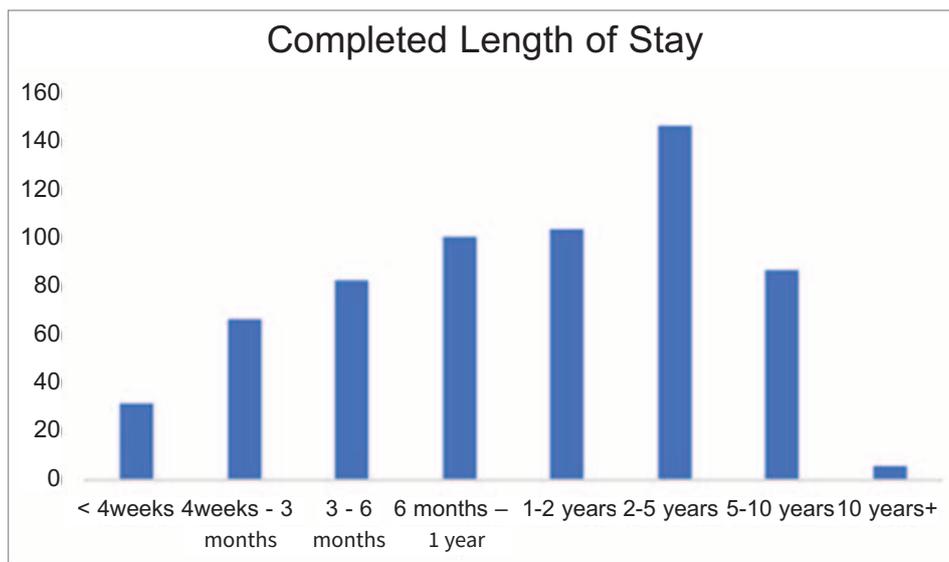
	Residential	Nursing	Total
Older People (over 65)	769	799	1,568
People with a Learning Disability (under 65)	223	24	247
People with Mental Health needs (under 65)	50	8	58
People with a Physical Disability (under 65)	30	100	130
Council Funded People	1,072	931	2,003
Health Funded: Continuing Healthcare Fund	0	282	282
Total	1,072	1,213	2,285
Health Funded: Funded Nursing Care			815

Over 85% of people were in permanent placements with the remainder in temporary placements.

Length of Stay

It is difficult to calculate the length of stay for care home residents as this is not data the Council routinely collects. Using central government's method of calculating length of stay, during 2018-19 the average length of stay for a person funded by the Council was 27 months. However, 45% of people passed away in the first 12 months of living in a care home.

The graph below shows the distribution of length of stay.



Out of County Placements

There are 430 people placed in care homes outside of Oxfordshire. 54% of these live in neighbouring council areas. 157 of these people are aged over 65 with 61% of them placed in neighbouring council areas.

Short Stay Beds

The Council and the Clinical Commissioning Group also purchase a range of short stay beds via a block contract. These are normally used for:

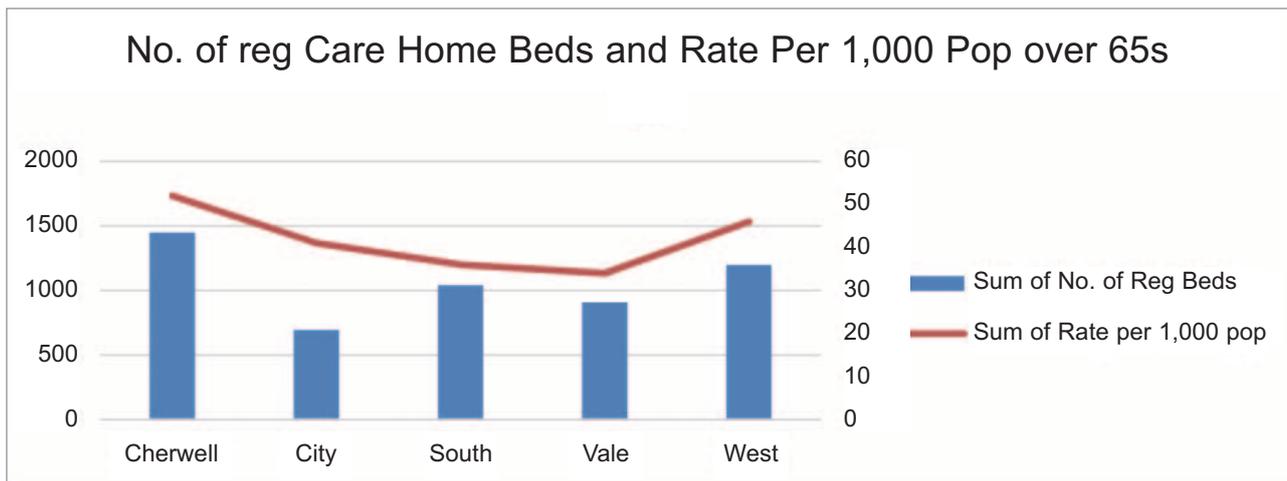
- Temporary accommodation whilst an individual's preferred placement is sourced or whilst an assessment of ongoing care needs is undertaken
- Rehabilitation to help people to recover from a stay in hospital or to avoid a hospital admission, this includes specialist therapeutic care
- Respite care

Supply of Care Homes

As of March 2019, there were 5,286 registered care home beds for older people across 116 care homes, operated by 74 companies.

In Oxfordshire there are on average 42 care beds per thousand older people, which is below the national average of 48. However our target bed rate is currently set at 41 beds per thousand older people. This is because the latest health statistics show that Oxfordshire is healthier than other parts of the country, as a result NHS funding for the area is 15% lower than the national average.

The average bed rate across Oxfordshire varies by district council area. As indicated in the graph below, Cherwell and West Oxfordshire have an oversupply, whilst there is a shortage in South Oxfordshire and the Vale of White Horse.



7.2 Future Service Provision

As highlighted previously, community services are provided and delivered with the principle of enabling people to live independently for as long as possible. The intention is that care homes will only be purchased by the Council and Clinical Commissioning Group for people who cannot live safely at home, and primarily for those with nursing and/or specialist needs, for example dementia.

The average age of people who are funded by the Council / Clinical Commissioning Group in care homes is 85.5 years, with an average length of stay of 23 months. Over the next decade it is expected that the average age will increase, and it is likely that 50% of residents aged over 85 will be living with dementia. Therefore, we can expect an increase in demand for specialist care home beds. This specialist care will require providers to develop services which can meet the increased acuity and frailty.

The self-funder population will also rise, but their current pattern of purchasing would indicate that they enter care when they are more able. It is estimated that 25% of self-funders require nursing care, compared to 46% of Council funded residents.

Additionally, an increasing number of children are moving into adulthood with complex health needs, which may add to the demand for care home places.

7.3 Key Messages

- Care Homes will predominately be used for people who can no longer live safely at home, and/or have complex nursing and specialist needs, for example dementia. As a result we will need more care home placements that can care for these people
- We intend to increase the number of block contracts with care home providers
- The Dynamic Purchasing System will be the main way of sourcing care home placements
- We will primarily use Extra Care Housing to provide care for people who can no longer live in their own home, but don't have the specialist needs that require a care home placement
- We will aim to create a bespoke Continuing Healthcare specification for care homes – with the aim of creating block contracts with care homes which are able to provide specialist care

8. Supported Living for People with Learning Disabilities

Our overall strategic approach is that people with learning disabilities should be supported to live in communities rather than in care homes, holding their own tenancies where possible. This has resulted in a large programme of Supported Living in Oxfordshire, with care homes only being used for a very small number of placements.

The national Transforming Care programme has provided the context for the Council's Supported Living developments as set out in the Oxfordshire Transforming Care Plan 2016-19. The aim of the programme has been to reduce reliance on inpatient care and to improve support to enable people to live in the community. Although there are very few Oxfordshire residents in hospital at any one time, there are many Oxfordshire people living in out-of-County care homes.

There are several specific commissioning plans for Supported Living, which include the following:

- Continuing to work with providers to reduce isolated 1, 2 and 3-person accommodation by clustering properties together or creating an increased number of properties with their own front door, whereby support can be shared
- Increasing the supply of Supported Living for adults with a learning disability, including developing the capacity and capability within the market to bring a significant number of people back to the county from out of area residential care placements
- Providing countywide coverage of purpose-built Supported Living for people with autism

8.1 Current Service Provision

We currently have a framework agreement covering Supported Living based around seven categories of need, with providers awarded framework contracts under each category. We intend to review this in 2019 to ensure it delivers:

- A range of good quality cost effective providers
- A system that is responsive to change and can take advantage of new opportunities, e.g. a new property
- Providers who are able to work in partnership with local authorities and health services to improve health and wellbeing
- Stability in the market
- Efficient procurement

The Council will continue to encourage people who can live independently with low level support, and do not require 24-hour support, to have their housing needs met through general needs accommodation e.g. a shared house or a flat.

Families can develop their own accommodation for people with low needs and we have produced a guide for families which describes a range of different options.

We currently support 776 people in Supported Living services.

Young People Transitioning to Adult Services

Previous experience and evidence from teams that support young people indicates that in Oxfordshire approximately 30 young people per year require housing at age 18.

Autism

On average 12 new people with autism require Supported Living per year, currently this level of demand means that people are placed in out-of-county residential services.

Out-of-County Placements

There are 180 people with a learning disability that are placed out-of-county, many of these placements are high cost. On average 11 people have been placed annually in 'out-of-county' placements over the past 6 years.

At present people are typically placed out-of-county due to having complex needs which cannot currently be met in Oxfordshire. These needs are predominantly related to autism, behavioural issues, personality disorder and/or mental illness.

People in Assessment & Treatment and Psychiatric Inpatient Units

On average Oxfordshire has fewer than five adults with learning disabilities in either specialist Assessment and Treatment Units or mainstream mental health hospitals. For the purposes of this Market Position Statement this cohort are typically included within the out of area or complex autism related needs groups.

People living with elderly parents

There are 216 people with learning disabilities who live with their parents or other relatives who themselves are aged 60 or older. This includes 55 people living with carers who are aged 80 or older.

Older People

Our planning assumption is that older people with learning disabilities will be supported in mainstream care such as Extra Care Housing and residential services.

Specialist Learning Disability Health Services

These services are provided by Oxford Health NHS Foundation Trust. Three Community Learning Disability Teams support people across the county to access mainstream health services, alongside provision of specialist psychiatry, psychology, nursing, occupational therapy and speech and language therapy.

People who are in crisis, including those at risk of admission to either specialist or mainstream mental health hospitals, are supported by the service's Intensive Support Team. This team works alongside the Community Teams, social care staff and care providers to carry out functional assessments and develop person centred support plans.

8.2 Future Service Provision

There are 75 existing Supported Living places which do not fit current requirements and we have an ongoing programme to recommission these services. Some of these have an NHS legal charge and we have successfully negotiated with NHS England to reinvest the proceeds of the sale of these properties.

In order to meet future need we intend to work with partners to develop new schemes, which include a combination of purpose-built Supported Living schemes, as well as conversions of existing properties. Some schemes may require self-contained annexes, to meet the needs of individuals unable to share accommodation with other people.

We want to develop placements that:

- Are clustered together so that care can be shared more efficiently
- Include self-contained flats where individuals can live independently in their own accommodation, with some shared space where appropriate
- Contain shared accommodation, where it is required, with bedrooms incorporating en-suite facilities

We have identified a cohort of approximately 75 people in out-of-county placements who have the potential to move to in-county Supported Living. We estimate that about 75% of the cohort will be able to sustain independent living. This means that at least 57 Supported Living places will need to be sourced between 19/20 and 22/23.

The table below summarises forecast future housing need for people with learning disabilities:

Cohorts	19/20	20/21	21/22	22/23
Reprovision of existing supported housing	8	14	24	22
Providing housing for people currently in residential care outside of Oxfordshire	14	15	15	13
People with complex autism related needs (who may or may not have a learning disability)	12	12	12	12
People with learning disabilities who also have significant physical disability related needs	5	7	11	11
People living with older family carers	13	13	13	13
Transforming Care Partnership cohort	2	0	0	0
TOTAL	54	61	75	71

Forecast housing need broken down by city and district council area is available upon request.

We estimate that there will need to be an increase in the number of care hours provided for people with learning disabilities over the period 2019-2023, with the most significant forecast growth area being for people with complex autism related needs.

The Council and the Clinical Commissioning Group will continue to work in partnership with people who use services, their family carers and health and social care providers to support and develop the learning disability workforce, both within Oxfordshire and across a wider geographical footprint where appropriate.

A Transforming Care workforce development plan is being implemented over the next three years. This plan aims to improve integration and joint working across health and social care and support the upskilling of support staff, particularly in the care of people with autism.

8.3 Key Messages

- We need to recommission those Supported Living schemes that do not fit current requirements
- We need to develop more purpose-built Supported Living schemes to meet the requirements of those with complex needs, including those who are transitioning from Children's services
- Our strategy is to develop purpose-built autism units across the county
- Our intention is to move away from commissioning out-of-county placements and move those people who are currently in out-of-county placements back to Oxfordshire
- We are working with people who use services, their families/carers, providers and other stakeholders to support the development of a workforce that can meet the needs of people with learning disabilities and / or autism



9. Mental Health Services

We want people who experience serious mental illness in Oxfordshire to:

- Live longer.
- Improve their level of functioning
- Receive timely access to assessment and support
- Maintain a role that is meaningful to them
- Continue to live in accommodation that is stable and is within Oxfordshire
- Experience fewer physical health problems related to their mental health

Currently the Council and the Clinical Commissioning Group commission an Outcomes Based Contract for mental health services from Oxford Health NHS Foundation Trust who then commission services that support people with mental health needs.

Currently these commissioned services include:

- In patient and community mental health services, including crisis response
- Housing and support services
- Employment and recovery services
- Social care personal budgets and individual packages
- Well being services and specialist psychology

9.1 Current Service Provision

In March 2019 there were approximately 3,500 people on the caseload of the Oxfordshire Mental Health Partnership. Demand is increasing with referrals into adult mental health services having increased from 5,196 in 2015/16 to 6,354 in 2017/18; an increase of 22%. There is an increasing need for services to support people with autism who also have a mental illness.

Housing Support & Care Beds

Within the current contract, housing support consists of up to 380 housing units ranging from low to intensive support. These include:

- 150 transitional housing
- 80 intensive supported housing
- 72 inpatient beds
- 40 longer term
- 12 residential
- 11 joint psychiatric intensive care beds

There are currently 68 people who require care home beds but who have been placed in spot placements outside of Oxfordshire. This is because there isn't enough local provision to meet their needs, which include severe and enduring mental illness, challenging behaviour or complex health needs. This is a gap in the local market which could be met either through specialist care home provision in-county or by additional intensive supported housing.

Homecare

About 100 people are receiving homecare from agencies and personal assistants. In general, suitable homecare for people with mental illness is difficult to find, and it is especially hard if they live outside Oxford city.

9.2 Future Service Provision

The Council and Clinical Commissioning Group will jointly develop this section of the Market Position Statement with key partners following the results of two significant pieces of system-wide work on mental health:

- The review of the Outcomes Based Contract
- The joint Council and Clinical Commissioning Group Strategy for Adults with Care and Support Needs

Following the completion of these pieces of work delivery plans will be produced which will inform Oxfordshire's future joint Market Position Statement for Mental Health which is expected to be available by April 2020.



10. High-level Oxfordshire Needs Analysis

10.1 Context; sources and further information

1. Each year the county council produces a *Joint Strategic Needs Assessment* (JSNA). This provides information about Oxfordshire's population and factors affecting health, wellbeing, and social care needs. The latest JSNA was published in March 2019.
2. Periodically more detailed JSNAs are produced focusing on specific groups of the population. This includes a
 - a. *2018 Older People JSNA*
 - b. *2018 Mental Health JSNA*
 - c. *2015 Working Age Adults JSNA*⁹
3. Additional helpful data can be found at the Projecting Older People Population Information (*POPPI*) and Projecting Adult Needs and Service Information (*PANSI*) websites. These are sites, developed by the Institute of Public Care (IPC) for use by local authority planners and commissioners of social care provision in England, together with providers. It is a programme designed to help explore the possible impact that demography and certain conditions may have on populations aged 18 to 64 and separately 65+.

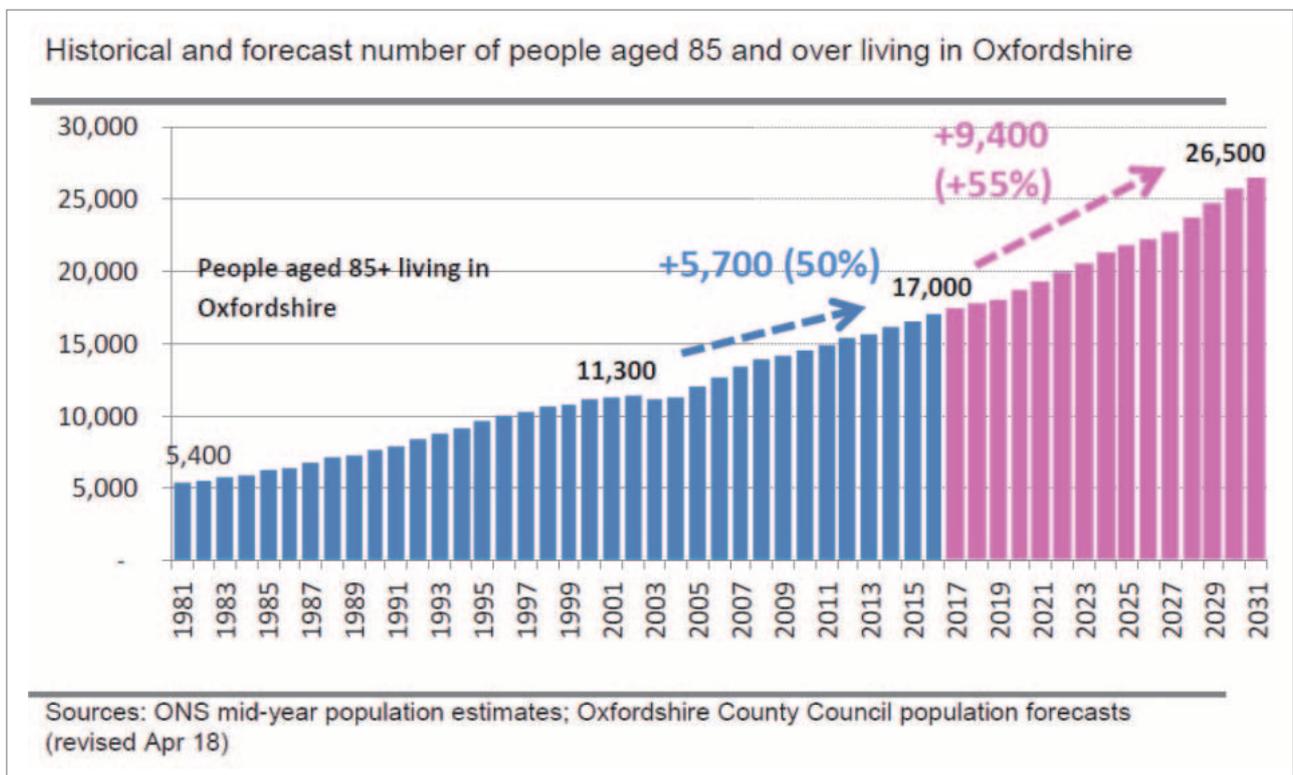
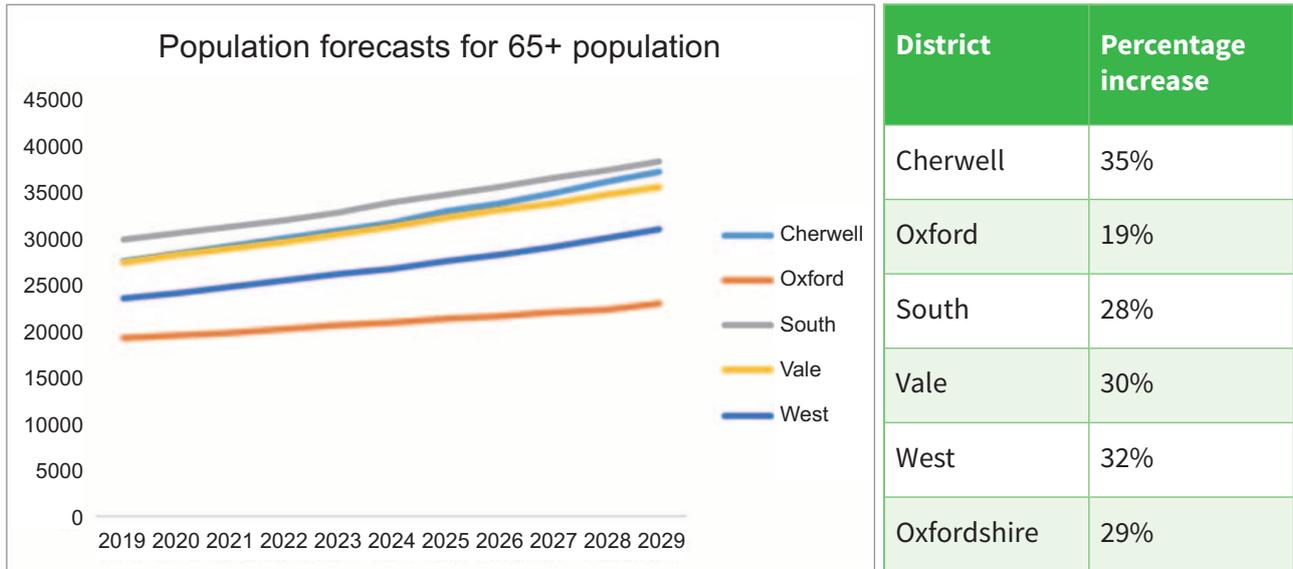
10.2 Older People

Key Figures About Older People

4. The health of people in Oxfordshire is generally good and we consistently outperform England averages on overall indicators of health and wellbeing. Unemployment is low, and the local economy is successful. However there remain challenges to local health and wellbeing, including the potential for a growing population of older people likely to be living in poor health and in pockets of deprivation.
5. There are 121,000 people over 65 living in Oxfordshire, of whom 17,100 are aged 85 years or over (2016). The number of people aged 65 and over is expected to grow to 174,400 by 2031, with a 55% increase in those aged 85 and over (an additional 9,400).

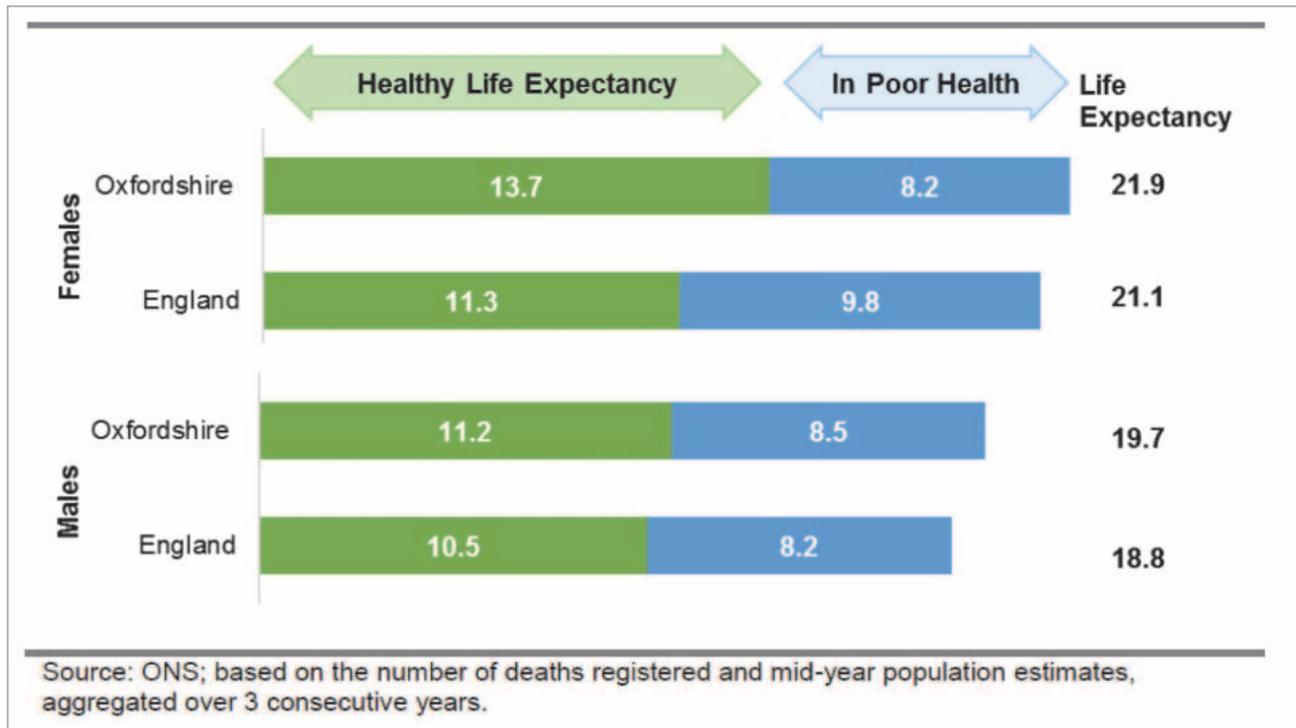
⁹ The 2015 JSNA will be updated to support the update for the Strategy for Adults with Care and Support Needs.

Projected growth by district of the number of people aged 65 and over in Oxfordshire 2019-2029:



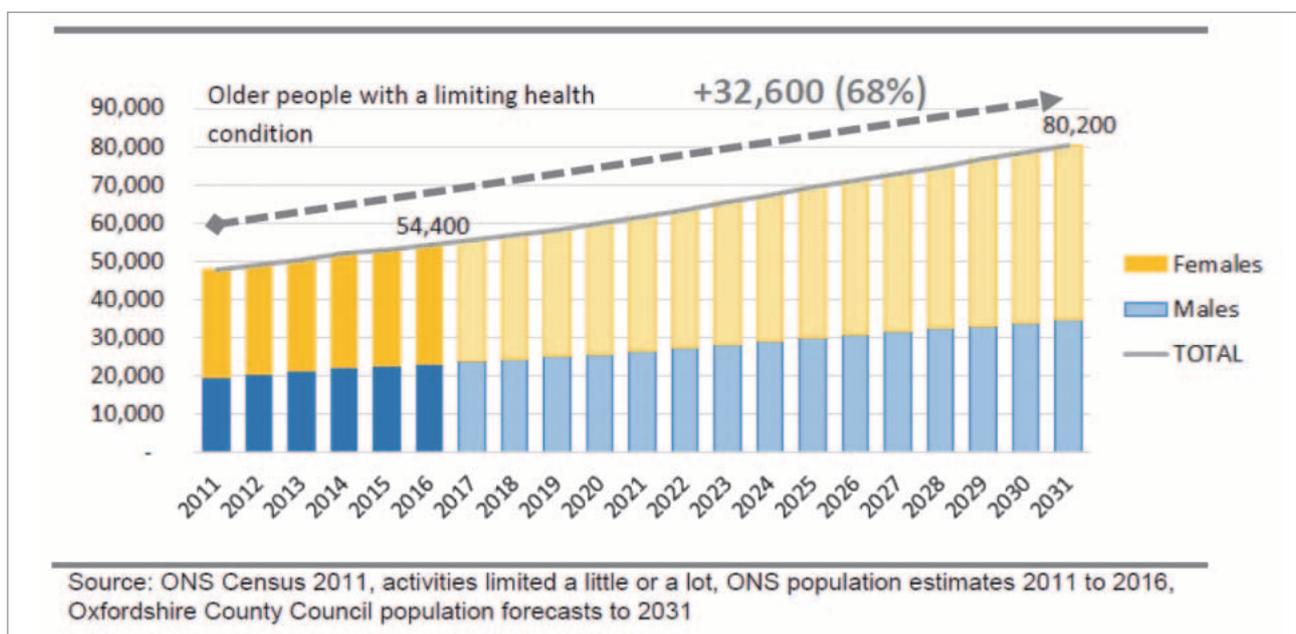
6. 6% of the population aged 65+ in Oxfordshire (2011) are from an ethnic minority background; this was below the England average of 8%. In Oxford City, 16% of the older population aged 65+ were from an ethnic minority group.
7. At age 65, females in Oxfordshire can expect almost 14 years of healthy life, followed by 8 years in poor health. Males at age 65 can expect just over 11 years of healthy life, followed by 8.5 years in poor health.

Life expectancy and healthy life expectancy at age 65, 2014 to 2016, Oxfordshire and England (yrs)



Health of Older People

- On public health measures of health and wellbeing of people over 65, Oxfordshire ranks similar to or better than the national average. Oxfordshire has a significantly better rate than England or the South East region for each of the three main causes of death (cancer, cardiovascular and respiratory disease).
- In 2011 there were an estimated 44,500 people aged 65 and over who were living with a life-limiting long-term health condition or disability. Applying the prevalence of long-term health conditions in 2011 to the actual and predicted growth in the older population suggests that by 2031 there could be 80,200 people aged 65+ living with a life-limiting long-term health condition or disability in Oxfordshire, an increase of 32,600 (+68%).



10. The chart above shows the estimated increase in number of people aged 65+ living with a life-limiting long-term health condition or disability in Oxfordshire (based on Census 2011 prevalence and forecast population growth).
11. In Oxfordshire 5,600 people are known to have dementia (2017-18), whilst a further 2,700 people are estimated to be living with undiagnosed dementia, a total of 8,300. Based on forecast population growth, this may reach 12,000 people by 2031.
12. An estimated 20,400 people in Oxfordshire experience loneliness at least some of the time, with at least 3,500 experiencing loneliness 'often or always'.

Use of Health and Social Care

13. Almost two thirds of Oxfordshire's complex patients are aged 65+ (2016-17) and 10,600 people receive long term social care (including self-funders). Many of these are aged 85 and over.
14. There was been an increase in the proportion of older social care clients supported at home, from 44% of older clients in 2012 to 59% in 2017, though this has subsequently fallen to 57%.
15. Based on the expected growth in the number of older residents, it is likely that Oxfordshire will see an increase in demand for health services and an increase in the demand for social care services for older people.

Rurality

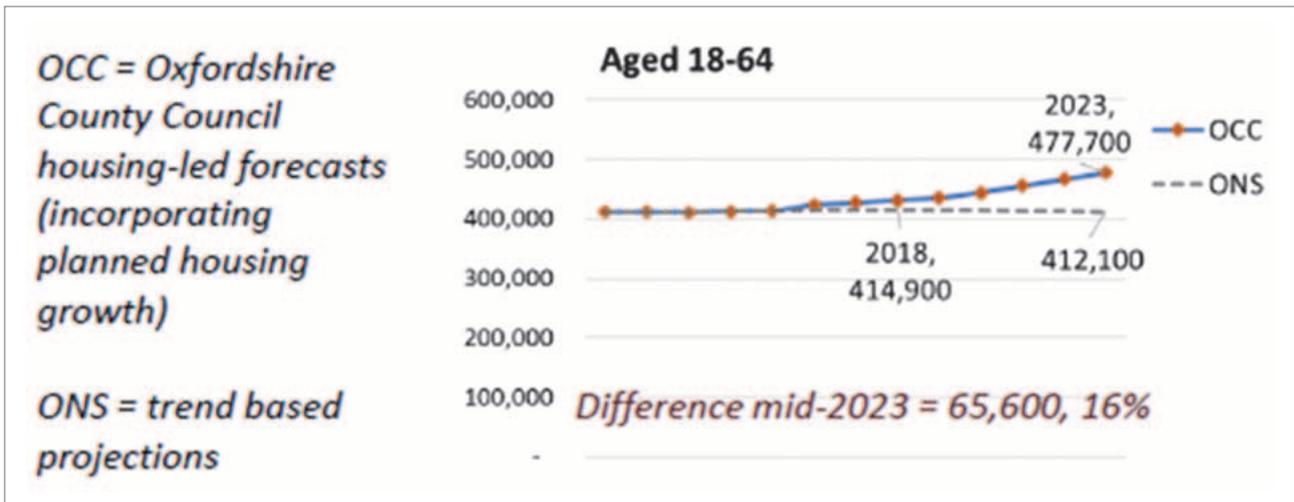
16. A higher proportion of older people live in rural areas than average. 42% of people aged 65+ (50,300) in Oxfordshire were living in rural parts of the county. 30,000 people aged 65+ are living alone (2011) of which 10,800 are living in rural Oxfordshire.

Financial security

17. In the main, Oxfordshire is a wealthy county and 60% of people receiving care services aged 65+ are estimated to be funding care themselves. However, 13,500 of people aged 65 and over are affected by income deprivation, mainly those living in urban areas. 10,750 are claiming pension credit. In addition, there are an estimated 6,500–7,500 older people who are not claiming benefits to which they are entitled.

10.3 Adults of Working Age

18. Oxfordshire's population is expected to continue to increase and housing-led forecasts give a higher population growth than the Office for National Statistics (ONS) trend-based projections. The ONS projections are based on past population trends, whereas local forecasts include known housing growth. This has a significant impact on the forecast such that:
 - a. The local housing-led forecast suggests a total population of 781,600 by 2023.
 - b. This is 84,900 people above the ONS projection – a difference of 16%.



19. The Projecting Adult Needs and Service Information (*PANSI*) website helpfully provides estimates of needs for the local population. In many cases this is based on prevalence rates taken from national studies and then applied to the latest ONS population projections. This will undercount needs if the population growth is more in line with local housing-led forecasts.
20. The table below extracts data from the *PANSI* website, but recognising the issue with the different forecasts adds a second figure for the 2023 position based on a simple 15% increase (that of the local population forecast) on the 2019 figures.

	2019	2023	Difference
ONS Population projections 18-64	414,900	412,000	-0.70%
Council Housing-led forecast 18-64	414,900	477,700	15.14%

Adults with a learning disability	2019	2023			Notes
		No	% growth ONS	Growth @15%	
People aged 18-64 predicted to have a learning disability	10,127	10,063	-0.63%	11,660	National prevalence worked out by Emerson & Hatton 20014, projected onto Oxfordshire population projection
People aged 65 predicted to have a learning disability	2,663	2,871	7.81%	n/a	
People aged 18-64 predicted to have a moderate or severe learning disability, and hence likely to be in receipt of services	2,311	2,284	-1.17%	2,661	
People aged 65+ predicted to have a moderate or severe learning disability, and hence likely to be in receipt of services	356	377	5.90%		
People aged 18-64 predicted to have a severe learning disability	615	613	-0.33%	708	
People aged 18-64 predicted to have a moderate or severe learning disability and be living with a parent, by age	871	876	0.57%	1,003	
People aged 18-64 predicted to have Down's syndrome	259	258	-0.39%	298	Based on rate of 6.25 per 10,000 population (Mantry et al and Clinical & Health Outcomes Knowledge base)
People aged 18-64 with a learning disability, predicted to display challenging behaviour Bottom of Form	187	185	-1.07%	215	Prevalence of 0.045% Lowe et al 2007
People aged 18-64 predicted to have autistic spectrum disorders	4,196	4,178	-0.43%	4,831	Prevalence of 1%

Adults with a physical disability	2019	2023			Notes
		No	% growth ONS	Growth @15%	
People aged 18-64 predicted to have impaired mobility	21,973	22,630	2.99%	25,299	Rates from Life Opportunities Survey Office for Disability Issues (2011)
People aged 18-64 predicted to have a moderate or serious personal care disability	21,463	21,786	1.50%	24,712	Rates from the Health Survey for England, 2001. Moderate = task can be performed with some difficulty; Severe = requires someone to help
People aged 18-64 predicted to have a serious personal care disability	5,566	5,608	0.75%	6,408	
People aged 18-64 predicted to have a longstanding health condition caused by a stroke	1,249	1,248	-0.08%	1,438	General Household Survey 2007 Bottom of Form
People aged 18-64 predicted to have either Type 1 or Type 2 diabetes	13,561	13,697	1.00%	15,614	<i>Cardiovascular Disease and Risk Factors in Adults</i> , The NHS Information Centre, 2008
Total population aged 18-64 predicted to have a serious visual impairment Bottom of Form	269	268	-0.37%	310	The prevalence of visual impairment in the UK, A review of the literature, by Tate, Smeeth, Evans, Fletcher, Owen and Rudnicka, RNIB, 2005
People aged 18-64 predicted to have some hearing loss	40,057	41,623	3.91%	46,120	Adrian Davis (Ed.), <i>Hearing in Adults</i> (1995). Threshold of 25 dBHL indicates some hearing loss; 65 dBHL indicates severe hearing loss.
People aged 18-64 predicted to have severe hearing loss	2,405	2,513	4.49%	2,769	

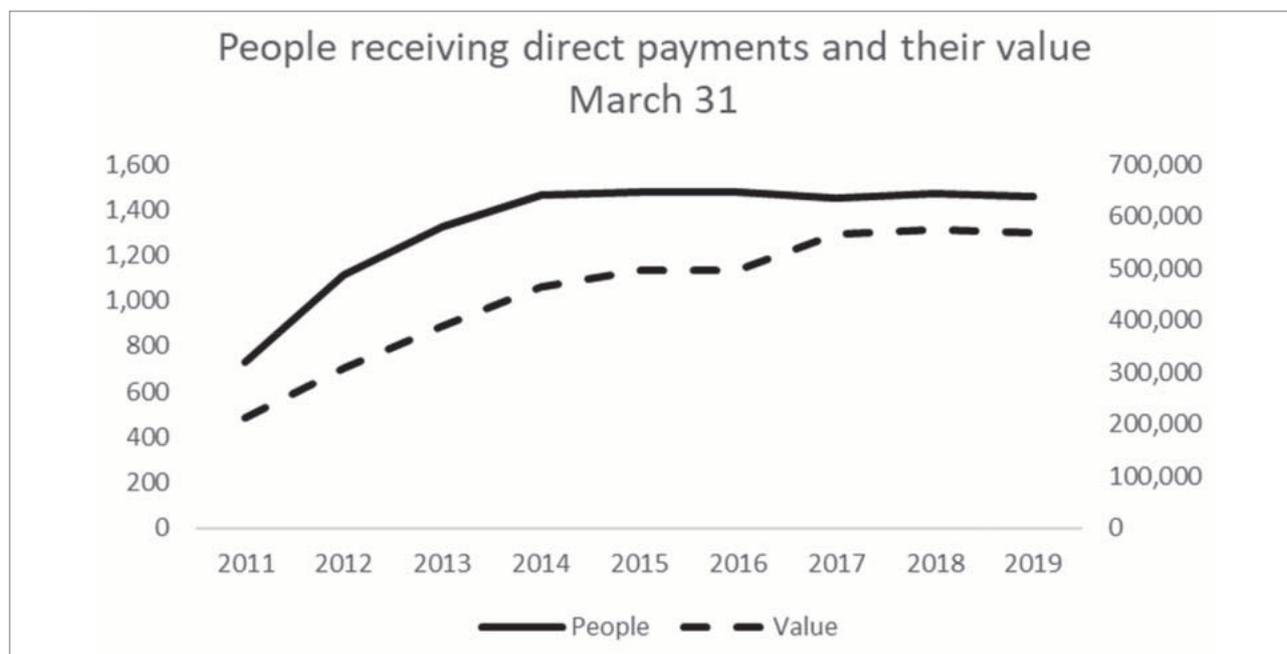
Adults with mental health problems	2019	2023			Notes
		No	% growth ONS	Growth @15%	
People aged 18-64 predicted to have a mental health problem	78,099	77,566	-0.68%	89,920	Adult Psychiatric Morbidity Survey: Survey of Mental Health and Wellbeing, England, 2014 (2016), NHS Digital. Bottom of Form
People aged 18-64 predicted to have a borderline personality disorder	9,919	9,852	-0.68%	11,420	
People aged 18-64 predicted to have an antisocial personality disorder	13,985	13,914	-0.51%	16,102	
People aged 18-64 predicted to have psychotic disorder	2,902	2,884	-0.62%	3,341	
People aged 18-64 predicted to have two or more psychiatric disorders	29,833	29,642	-0.64%	34,349	
Total population aged 18-64 predicted to have alcohol dependence	25,043	24,620	-1.69%	28,834	<i>Adult psychiatric morbidity in England, 2007</i>
Total population aged 18-64 predicted to be dependent on drugs	14,165	13,895	-1.91%	16,309	
Survivors of Sexual abuse	47,400	47,056	-0.73%	54,575	Cawson, P <i>et al</i> (2000)
Early on set dementia	175	183	4.57%	201	Dementia UK: Update (2014)

21. Data from the 2019 Joint Strategic Needs Assessment (JSNA), indicates that as of October 2018, 11,554 people were claiming Personal Independence Payments in Oxfordshire (aged 16 to state pension age).

10.4 Direct Payments

22. In Oxfordshire 35% of people receiving long term support at home organise their support via a Direct Payment. This is considerably higher than the national average (28.5%).

23. The number of people receiving a Direct Payment rose until March 2014 and has been stable thereafter. At the end of 2018/19 just over 1450 people received a Direct Payment at a total cost of just under £570,000 per week.



24. Due to the nature of Direct Payments we do not always know exactly what type of support the payment is used to purchase. However at £20 an hour, £570,000 would purchase 28,500 hours of care per week.



**Social Needs Report,
supporting the proposed
development of
specialised accommodation
for older people as part of the
proposed development at
Freeland in West Oxfordshire**

Prepared for Inspired Villages Group

**Nigel Appleton
with David Appleton
13th August 2020**



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Twelve Key Points

1. West Oxfordshire District has a substantial population of older people and this will increase both in absolute numbers and as a proportion of the total population.
2. The prevalence of difficulties with those tasks required to live independently or which indicate a need for care increases with age. It is therefore unsurprising that an increasing number of older people in West Oxfordshire will be living with these challenges to independent living.
3. Specialised accommodation, of the kind proposed in this application, can mitigate those difficulties, reduce the risks associated with them, and provide services to maximise independence, dignity and quality of life. There is a current under-supply of specialised accommodation for older people within West Oxfordshire.
4. Around four-fifths of the older population of the District between 65 and 84 years of age are home-owners and for them the deficit in provision of appropriate accommodation options is particularly acute.
5. Policy at national and local level encourages the provision of services to older people in their existing homes as a first line of response but recognises that this is not always practicable, by reason of the design or location of their property, or desirable for reasons associated with the person's functional, health or social circumstances. In these cases specialised accommodation is identified as the preferred option.
6. There are strong policy imperatives at national and local level to reduce increasing reliance upon care provided in Registered Care Homes and to divert to specialised accommodation those who might otherwise occupy care beds intended for those with the highest levels of frailty.
7. An adequate supply of all forms of specialised accommodation provides options for the diversity of circumstances and needs found within the population of older people. This reduces the pressures for "upward transference", that is the allocation of older people to facilities providing a

- higher level of care service than their needs warrant simply through lack of more appropriate alternative.
8. Specialised accommodation is recognised in the research literature as providing benefits to the health and well-being of the residents and to the local health and social care economy in reducing demand on primary health care services, reducing presentations to Accident and Emergency departments and expediting discharge for those who do require in-patient care.¹
 9. Specialised accommodation is also seen to contribute to meeting general housing need by providing options for those older people who wish to “right-size” and thus release their existing under-occupied family sized accommodation to new occupiers.²
 10. Planning Practice Guidance issued in June 2019 identifies the need to respond to the accommodation needs of an ageing population as “critical”³.
 11. Current levels of provision of Extra Care in West Oxfordshire are inadequate for current levels of need and provide no basis for responding to the increasing levels of need now projected for the next decade and a half. The deficit is particularly acute in relation to that overwhelming majority of older people who are currently homeowners and wish to access an option that will allow them to maintain their chosen tenure.
 12. The consequence of failing to facilitate an adequate level of response will be a rising level of difficulty and risk for individuals but also a situation in which existing services are overwhelmed by rising demand. The development proposed for Freeland will contribute to improving the situation by offering a viable and robust option for those older people within the West Oxfordshire District and the wider catchment area that it will serve who will recognise an attractive and appropriate alternative to their current situation.

¹ The Final Report: Collaborative research between the Aston Research Centre for Healthy Ageing and the Extra Care Charitable Trust, 2015. <http://www.aston.ac.uk/lhs/research/centres-facilities/archa/extracare-project/>

² See, for example, evidence to the CLG Select Committee Report, February, 2018: <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/370/37008.htm>

³ <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

1 The approach to examining need and setting it against current supply

1.1 National Planning Practice Guidance⁴ directs attention to the range of methodologies that may be adopted to estimate the current and future need for specialised accommodation for older people. We review the available approaches in Section Two of this report.

1.2 All the available approaches adopt a similar route: examining the current and projected population of older people within the local area (usually the LPA or Housing Authority area), looking next at incidence of functional incapacity and health status in that population to form a view of the scale of need within the older population. Having had regard to the guidance available in national and local policy and the evidence found in the research literature, a target for future provision will be projected⁵.

1.3 It is at this point that methodologies diverge, some being more strongly influenced by current prevalence and others being more focused on the need to which specialised accommodation with associated care and support can respond.

1.4 In this report we have followed the approach set out in the publication “Housing in Later Life”⁶, one of the approaches commended in NPPG from 2014 onwards.

1.5 These adopt a projected prevalence figure for Extra Care that will respond to the indicators of need and support the delivery of an alternative to increasing reliance upon Registered Care Home beds by indicating a ratio of 45 units per 1,000 of the local population who are 75 years of age or over is desirable.

1.6 To bring supply onto closer alignment with tenure choice among older people it suggests that this total be divided one third for social rented and two thirds for sale.

1.7 Whilst the SHOP@ Tool, referenced in the NPPG 2019 and widely used by local authorities and those advising them is capable of producing an identical answer it is often used with projected prevalence ratios more reflective of current supply than potential need.

1.8 It is for this reason that in July 2019 the Housing Learning and Improvement Network (Housing LIN), who provide the SHOP@ Tool, decided to

⁴ NPPG June 2019 but also earlier issues from 2014 onwards, as referenced in Section Nine

⁵ A fuller account of the available methodologies and reasons for favouring the approach adopted in this report may be found at Annex Three to this report.

⁶ “Housing in later life – planning ahead for specialist housing for older people” (National Housing federation and the Housing LIN, December 2012)

restrict access to it as they felt it had been used to produce artificially low outcomes.

1.9 By adopting the ratios of provision set out in Housing in Later Life we offer a realistic set of targets for provision of specialised accommodation that will meet the needs of the current and future population of older people in West Oxfordshire.

1.10 These suggest, inter alia, that there is a current need for 342 units of Extra Care for leasehold sale against a current supply of 59 units and that to respond to the ageing population of West Oxfordshire and their tenure preference this number will need to rise to 472 units by 2035. Section Eleven of this report sets out projected requirements across the range of specialised accommodation.

2 Summary of the evidence

2.1 The profile of the West Oxfordshire in relation to the age of its population is above the national average, with those 65 years of age approaching 30% of the total population of the district by 2035 this is one of the major challenges faced by health and social care authorities.

2.2 Whilst the crucial role of appropriate housing and the widest range of options for older people is widely recognised, problems in achieving an appropriate supply remain.

2.3 Those having difficulty with one or more domestic tasks will increase between 2019 to 2035 from 6,907 to 10,070, an increase of 46%. A failure to manage these tasks often persuades older people, or their relatives, of the need for a move to a high care setting, such as a Registered Care home, when their needs would be better met in specialised accommodation, such as that proposed in this application.

2.4 Similarly those experiencing difficulty with at least one task of personal care are projected to rise from 6,852 in 2019 to 9,914 in 2035. This may contribute to additional demand for specialised accommodation but will have a direct impact on demand for care home places.

2.5 Those finding at least one mobility activity difficult or impossible will increase by around 52% between 2019 and 2035. The impact of these difficulties on the capacity for independent living can be significantly mitigated by appropriate design and flexible delivery of care and support services.

2.6 Throughout the period to 2035 there is predicted to be a 52% increase in the population aged 65 and above that have dementia; with around 100% increase in the 90 years of age and over cohort. These significant rises will again place increasing demand on care and accommodation places.

2.7 By its design and facilities the proposed development at Freeland will offer an alternative to those living with these difficulties and enable them, to maintain a measure of independence and quality of life to those living with these difficulties.

2.8 The evidence in West Oxfordshire of steeply increasing levels of need shown by projections of those persons in need of personal care, assistance with domestic tasks and in managing mobility demonstrates a requirement for a range of accommodation and care options. The diversity and volume of need requires a range of responses to be brought forward on a sufficient scale if existing services are not to be overwhelmed.

2.9 West Oxfordshire follows but exceeds the national trend toward owner-occupation as the dominant tenure for older people. Levels of owner-occupation

among older people in the district are above national averages at 81.53% for those between 65 and 74 years of age. In the oldest age group the level of home ownership may be depressed by lack of options for owner-occupation in specialised accommodation but remains just below 72%.

2.10 The majority of those persons who currently own their own homes will wish to retain that tenure as they move to specialised accommodation. They will also look for accommodation of a comparable quality to that which they currently occupy. This suggests that if the needs of all older homeowners are to be addressed a range of options need to be provided that mirrors the range of options available in the general housing market within West Oxfordshire

2.11 There are many reasons why this option commends itself to older people who are homeowners: they are able to retain equity in the property that can be drawn upon during their old age or left to family members or others as a legacy. It maintains the sense of life-achievement that many home-owners feel when they have paid-off their mortgage and can say that they own their property. By retaining ownership, through purchase of a long-lease (typically 99 or 125 years) they feel they are retaining a degree of control over their own circumstances.

2.12 Leasehold ownership is not of course an option that is appropriate in all cases of those seeking to access specialised accommodation in old age and the Market is beginning to diversify its offer to provide opportunities for Shared-Ownership and for Market Rental.

2.13 Taking the level of homeownership among older people in the District into consideration when reviewing the local supply of specialised accommodation there is clearly a shortfall in the in the level of provision needed to achieve an adequate supply for older homeowners wishing to maintain their tenure when transferring to specialised accommodation.

2.14 Whilst there is a substantial supply of leasehold retirement housing this comes nowhere near reflecting the dominance of owner-occupation among the older population of West Oxfordshire. There is a consequent shortfall in the level of provision needed achieve an adequate supply for older homeowners wishing to maintain their tenure when transferring to specialised accommodation. For those older people who are owner-occupiers the ratio of provision for retirement housing for sale per thousand is 69.08. Whilst for those older people who are renters the comparable ratio per thousand is 176.67.

2.15 Whilst the levels of provision of Extra Care Housing at social rent or shared ownership, and that more limited supply offered for leasehold purchase are close to the national averages this does not reflect the need for such accommodation.

2.16 Although the level of provision of bed spaces in Registered Care Homes providing Personal Care is very significantly below national averages this is more than balanced by the high level of provision of beds registered for the delivery of Nursing Care. This is a care economy with a heavy dependence on Nursing Care beds, which runs counter to national and local policy priorities

2.17 West Oxfordshire is overly dependent on Nursing Care beds, having a level of provision around 75% above the average for England. The provision of a more adequate and appropriate supply of retirement accommodation of all kinds for homeowners will provide an environment of choice in which independence can be sustained and transfer to expensive Registered Care postponed or avoided. The development proposed by Inspired Villages will contribute toward this more adequate level of provision for older homeowners.

2.18 Providing appropriate options for those older people needing affordable specialised housing for rent will continue to have high priority in the allocation of public funds, but the strategic consideration of equal priority is the facilitation of appropriate and attractive provision for older homeowners.

2.19 The role of specialised housing in achieving desired policy outcomes is outlined in various policy documents from both Ministry of Housing and Local Government and Department of Health and Social Care cited in Section Nine of this Report. The absence of appropriate accommodation and care options for many older people is recognised, both in Government consultation documents and in research. The limited options faced by older home-owners are well recognised and the role of the planning system in alleviating this difficulty is clearly identified.

2.20 The policies of West Oxfordshire District Council, Oxfordshire County Council and their Health partners, cited in Section Ten of this Report, recognise the ageing of the local population as a factor influencing future requirements for accommodation.

2.21 The most relevant social benefit that arises from the provision of appropriate and attractive specialised accommodation is that people who own homes of their own have an option that meets their needs and aspirations. The proposed development at Freeland will deliver benefits to the individuals who live there and to the wider community of the district from which they are drawn.

2.22 An additional, and increasingly recognised benefit of offering more, and more attractive, options to older people for their accommodation and care is that family-sized accommodation will be released by their move to specialised provision. Thus the individuals who move to the proposed development at West Oxfordshire will have the benefit of a more appropriate and easily managed living environment and will also have enabled those who move into the home they

have released to be more appropriately housed, cascading property down the purchaser chain.

2.23 In the absence of appropriate, contemporary accommodation options pressures will increase on higher-end services, such as Registered Care Homes providing Personal Care and Registered Care Homes providing Nursing Care. The proposed development at Freeland, contributes to providing the alternative options favoured in national and local policies responding to this substantially aged and ageing population.

2.24 It also offers augmentation to the relatively limited provision of Registered Care Home places offering Personal Care with modern and sustainable provision for those with the highest levels of need. It does so in the context that will offer the possibility of a couple with differential needs being appropriately accommodated and cared for on the same site.

2.25 The option of purchasing accommodation, such as that proposed for Freeland, brings other advantages to the older person, beyond those of being a more accessible and manageable dwelling. The nature of the facilities proposed and the community life that is facilitated provides increased personal security and well-being, and combats loneliness.

2.26 Considerations of demography, need, tenure, and policy all reinforce the imperative to increase the availability of Extra Care Housing for older homeowners. Our model (Section Eleven following) shows a current deficit of over 280 units for Extra Care accommodation for sale to older homeowners with a widening deficit over succeeding years unless substantial further developments are facilitated.

2.27 For many who have promoted the Extra Care model part of its attraction is that for those who make a pre-emptive move the level of their dependency may be mitigated or the rate of its onset slowed. For the great majority it will provide a home for life with the flexibility to provide care and support at increasing levels as circumstances change.

3 The demography of the older population of West Oxfordshire

3.1 There is a projected rise in the total population of around 38% for those people aged 65 years and over within West Oxfordshire up to the year 2035. Within this overall growth there is a steeper rate of increase within the oldest cohorts, the number of those ninety years of age or more projected to increase by 93% or 1,300 over the period to 2035.

Table One Population aged 65 and over, projected to 2035 (West Oxfordshire)

	2019	2020	2025	2030	2035
People aged 65-69	6,100	6,100	6,700	7,900	7,700
People aged 70-74	6,400	6,500	5,900	6,500	7,600
People aged 75-79	4,600	4,800	5,900	5,500	6,100
People aged 80-84	3,300	3,400	4,100	5,200	4,800
People aged 85-89	2,100	2,200	2,600	3,200	4,100
People aged 90 and over	1,400	1,400	1,600	2,000	2,700
Total population 65 and over	23,900	24,400	26,800	30,300	33,000

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

3.2 In the period to 2035 the younger cohort, those aged between 65 to 69 and 70 to 74 increase only slightly before climbing to a 1,600 and 1,400 increase respectively over the whole period. The rate of increase is higher in each succeeding cohort to peak at 95% among those between 85 and 89 years of age. Table Two plots the percentage increase in each age band from the 2019 base.

Table Two Population aged 65 and over, projected to 2035 (West Oxfordshire) % Change

	2019	2020	2025	2030	2035
People aged 65-69	0	0	10%	30%	26%
People aged 70-74	0	2%	-8%	2%	19%
People aged 75-79	0	4%	28%	20%	33%
People aged 80-84	0	3%	24%	58%	45%
People aged 85-89	0	5%	24%	52%	95%
People aged 90 and over	0	0	14%	43%	93%
Total population 65 and over	0	2%	12%	27%	38%

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

3.3 Table Three shows the projected increase in the total population for the West Oxfordshire from 109,800 in 2019 to 113,900 in 2035, set against the increase in the numbers of people who are over 65 years of age and over 85 years of age and over. These two threshold ages are used because 65 represents the general point of exit from paid employment and 85 is, as will be shown in the next section, a significant threshold for needing specialised accommodation and services.

3.4 The proportion of the population 65 years of age or over in West Oxfordshire is significantly above the national average for England and exceeds that average by a widening margin throughout the period to 2035. For those 85 years of age and above the proportion in West Oxfordshire is higher than the average for England and the differential, although modest, widens over the period to 2035. This is an elderly population overall and it is characterised by a higher than average proportion of people in advanced old age.

Table Three Total population, population aged 65 and over and population aged 85 and over as a number and as a percentage of the total population, projected to 2035 (West Oxfordshire)

	2019	2020	2025	2030	2035
Total population	109,800	110,200	111,800	112,900	113,900
Population aged 65 and over	23,900	24,400	26,800	30,300	33,000
Population aged 85 and over	3,500	3,600	4,200	5,300	6,800
Population aged 65 and over as a proportion of the total population	21.77%	22.14%	23.97%	26.84%	28.97%
Population aged 85 and over as a proportion of the total population	3.19%	3.27%	3.76%	4.69%	5.97%

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

3.5 Table Four gives the numbers and percentages for England to provide a comparison.

Table Four Total population, population aged 65 and over and population aged 85 and over as a number and as age of the total population, projected to 2035 – England

	2019	2020	2025	2030	2035
Total population	56,357,500	56,704,700	58,224,900	59,548,800	60,691,400
Population aged 65 and over	10,366,000	10,527,200	11,550,300	12,897,300	14,116,600
Population aged 85 and over	1,390,400	1,421,000	1,623,700	1,930,400	2,460,300
Population aged 65 and over as a proportion of the total population	18.39%	18.56%	19.84%	21.66%	23.26%
Population aged 85 and over as a proportion of the total population	2.47%	2.51%	2.79%	3.24%	4.05%

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

3.6 The significance of these threshold ages is to be found in the convergence of dependency and chronological age. At age 65 the lifetime risk of developing a need for care services to assist with personal care tasks is 65% for men and 85% for women⁷. The incidence of need for assistance increases substantially with age and is highest for those 85 years of age and above. As the tables in the following section modelling levels of dependency and need for service demonstrate this increase in the ageing of the population has a direct impact on the need for care and support services and appropriate accommodation.

⁷ David Behan, Director General for Adult Social Care, Department of Health, presentation to a King's Fund Seminar 21st July 2009

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3.7 The profile of the West Oxfordshire in relation to the age of its population is above the national average, with those 65 years of age approaching 30% of the total population of the district by 2035 this is one of the major challenges faced by health and social care authorities.

3.8 In the absence of appropriate, contemporary accommodation options pressures will increase on higher-end services, such as Registered Care Homes providing Personal Care and Registered Care Homes providing Nursing Care.

4 Indicators of need in the local population of older people

4.1 Table Five shows the modelling of those older people who are likely to experience difficulty with at least one task necessary to maintain their independence. As is clearly seen the incidence of difficulty rises sharply with age and is projected to increase over time as the population of those in the highest age groups increases. Between 2019 and 2035 the number of those experiencing such difficulties is projected to increase by around 46%.

Table Five People aged 65 and over unable to manage at least one domestic task on their own, by age group projected to 2035 (West Oxfordshire)

	2019	2020	2025	2030	2035
Males aged 65-69 who need help with at least one domestic task	435	435	480	555	540
Males aged 70-74 who need help with at least one domestic task	570	570	513	589	684
Males aged 75-79 who need help with at least one domestic task	594	621	756	675	756
Males aged 80 and over who need help with at least one domestic task	957	957	1,188	1,485	1,650
Females aged 65-69 who need help with at least one domestic task	608	608	665	779	779
Females aged 70-74 who need help with at least one domestic task	782	782	713	782	943
Females aged 75-79 who need help with at least one domestic task	816	884	1,088	1,020	1,088
Females aged 80 and over who need help with at least one domestic task	2,145	2,255	2,640	3,300	3,630
Total population aged 65 and over who need help with at least one domestic task	6,907	7,112	8,043	9,185	10,070

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)
 Activities include: Doing routine housework or laundry, shopping for food, getting out of the house, doing paperwork or paying bills. These are Instrumental Activities of Daily Living (IADLs) are activities which, while not fundamental to functioning, are important aspects of living independently.

4.2 Table Six suggests that the number of those who will be unable to manage at least one personal care task will also increase by approximately 45% between 2019 and 2035 to just above ten thousand.

Table Six **People aged 65 and over unable to manage at least one personal care task on their own, by age group projected to 2035 (West Oxfordshire)**

	2019	2020	2025	2030	2035
Males aged 65-69 who need help with at least one self-care activity	464	464	512	592	576
Males aged 70-74 who need help with at least one self-care activity	630	630	567	651	756
Males aged 75-79 who need help with at least one self-care activity	616	644	784	700	784
Males aged 80 and over who need help with at least one self-care activity	1,015	1,015	1,260	1,575	1,750
Females aged 65-69 who need help with at least one self-care activity	704	704	770	902	902
Females aged 70-74 who need help with at least one self-care activity	816	816	744	816	984
Females aged 75-79 who need help with at least one self-care activity	696	754	928	870	928
Females aged 80 and over who need help with at least one self-care activity	1,911	2,009	2,352	2,940	3,234
Total population aged 65 and over who need help with at least one self-care activity	6,852	7,036	7,917	9,046	9,914

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)
 Activities of Daily Living (ADLs) are activities relating to personal care and mobility about the home that are basic to daily living: Having a bath or shower , using the toilet, getting up and down stairs, getting around indoors, dressing or undressing, getting in and out of bed, washing face and hands, eating, including cutting up food, taking medicine.

4.3 In the past few years social care services funded from public funds have focused on supporting those who have difficulty with tasks of personal care. The projected increase in the numbers of older people experiencing difficulty therefore impacts directly on the likely demand for services.

Table Seven People aged 65 and over with a limiting long-term illness, by age, projected to 2035 (West Oxfordshire)

	2019	2020	2025	2030	2035
People aged 65-74 whose day-to-day activities are limited a little	2,341	2,359	2,359	2,696	2,865
People aged 75-84 whose day-to-day activities are limited a little	2,376	2,466	3,008	3,218	3,278
People aged 85 and over whose day-to-day activities are limited a little	974	1,002	1,169	1,475	1,892
Total population aged 65 and over with a limiting long term illness whose day-to-day activities are limited a little	5,691	5,827	6,536	7,389	8,035
People aged 65-74 whose day-to-day activities are limited a lot	1,199	1,208	1,208	1,381	1,467
People aged 75-84 whose day-to-day activities are limited a lot	1,682	1,746	2,129	2,278	2,321
People aged 85 and over whose day-to-day activities are limited a lot	1,269	1,305	1,523	1,921	2,465
Total population aged 65 and over with a limiting long-term illness whose day-to-day activities are limited a lot	4,149	4,259	4,860	5,580	6,253

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

4.4 An increase in the proportion of the population living into advanced old age also impacts on the demands made upon health services. Table Seven projects an increase in the numbers of those experiencing a long-term limiting illness. This shows an overall increase for those over 65 years of age whose day-to-day activities are limited a lot is above 50%.

4.5 Table Eight below highlights that in all age cohorts above 65 there will be a marked increase in those within the population that are unable to manage at least one mobility activity on their own.

Table Eight People aged 65 and over unable to manage at least one mobility activity on their own, by age, projected to 2035 – (West Oxfordshire)

	2019	2020	2025	2030	2035
People aged 65-69 unable to manage at least one activity on their own	520	520	571	665	657
People aged 70-74 unable to manage at least one activity on their own	844	844	766	854	1,016
People aged 75-79 unable to manage at least one activity on their own	768	822	1,008	930	1,008
People aged 80-84 unable to manage at least one activity on their own	792	821	991	1,255	1,161
People aged 85 and over unable to manage at least one activity on their own	1,540	1,590	1,880	2,320	2,965
Total population aged 65 and over unable to manage at least one activity on their own	4,464	4,597	5,216	6,024	6,807

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)
 Activities include: going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed

4.6 Table Nine shows that the predicted increase between 2019 and 2035 in those in West Oxfordshire over 65 years of age who will be living with dementia to be around 52%. This is very close to the projections for England which stands at 51%.

Table Nine People aged 65 and over predicted to have dementia, by age and gender, projected to 2035 (West Oxfordshire)

	2019	2020	2025	2030	2035
People aged 65-69 predicted to have dementia	101	101	111	129	128
People aged 70-74 predicted to have dementia	195	195	177	198	235
People aged 75-79 predicted to have dementia	275	294	360	331	360
People aged 80-84 predicted to have dementia	365	377	455	576	532
People aged 85-89 predicted to have dementia	399	399	469	595	742
People aged 90 and over predicted to have dementia	401	436	519	636	813
Total population aged 65 and over predicted to have dementia	1,735	1,801	2,089	2,466	2,809

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

4.7 Table Ten shows the number projected for England for the purpose of comparison.

Table Ten People aged 65 and over predicted to have dementia, by age and gender, projected to 2035 England

	2019	2020	2025	2030	2035
People aged 65-69 predicted to have dementia	46,402	46,259	51,062	58,706	59,874
People aged 70-74 predicted to have dementia	84,737	85,954	80,068	88,751	102,391
People aged 75-79 predicted to have dementia	116,722	121,306	151,905	142,671	159,076
People aged 80-84 predicted to have dementia	160,119	162,529	185,699	235,166	223,627
People aged 85-89 predicted to have dementia	160,187	163,019	185,579	218,006	280,460
People aged 90 and over predicted to have dementia	160,505	164,451	185,506	222,156	276,390
Total population aged 65 and over predicted to have dementia	728,671	743,518	839,819	965,455	1,101,818

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

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4.8 Those having difficulty with one or more domestic tasks will increase between 2019 to 2035 from 6,907 to 10,070, an increase of 46%. A failure to manage these tasks often persuades older people, or their relatives, of the need for a move to a high care setting, such as a Registered Care home, when their needs would be better met in specialised accommodation, such as that proposed in this application.

4.9 Similarly those experiencing difficulty with at least one task of personal care are projected to rise from 6,852 in 2019 to 9,914 in 2035. This may contribute to additional demand for specialised accommodation but will have a direct impact on demand for care home places.

4.10 Those finding at least one mobility activity difficult or impossible will increase by around 52% between 2019 and 2035. The impact of these difficulties on the capacity for independent living can be significantly mitigated by appropriate design and flexible delivery of care and support services.

4.11 Throughout the period to 2035 there is predicted to be a 52% increase in the population aged 65 and above that have dementia; with around 100% increase in the 90 years of age and over cohort. These significant rises will again place increasing demand on care and accommodation places.

5 The tenure profile of the older population

5.1 Next to demographic trends toward an ageing of society the most significant factor shaping the future of provision for older people is the shift in tenure pattern. Owner-occupation has become the tenure of the majority of older people.

5.2 Traditionally local authorities have been primarily focused on the provision of social rented housing. Although the past two decades have seen a shift away from direct provision by local authorities concerns for this sector have tended to dominate thinking and resources.

5.3 There has been an implicit assumption that older people who are homeowners can, through the deployment of the equity represented by their current home, make provision themselves for their accommodation in old age.

5.4 Table Eleven demonstrates the significant levels of owner occupation now to be found among older people in West Oxfordshire. The level of home ownership in the borough is around 4% to 5% above the national average owner-occupiers with high levels maintained even into the oldest age group where it falls slightly to close to 72%.

5.5 The fall in ownership in the older cohorts is explained principally by the limited range of options available to homeowners in these cohorts who have needed to find specialist accommodation and care have not had opportunities available to them that allowed them to maintain their tenure.

Table Eleven Proportion of population by age cohort and by tenure, year 2011 (West Oxfordshire)

	People aged 65-74	People aged 75-84	People aged 85 and over
Owned	81.53%	78.25%	71.95%
Rented from council	1.64%	2.84%	3.84%
Other social rented	10.59%	13.50%	15.57%
Private rented or living rent free	6.24%	5.42%	8.64%

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

5.6 Table Twelve gives the average levels for England. The difference is consistent across the first two age cohorts shown and narrows slightly in the oldest age cohort.

Table Twelve Proportion of population aged 65 and over by age and tenure, i.e., owned, rented from council, other social rented, private rented or living rent free, year 2011 – England

	People aged 65-74	People aged 75-84	People aged 85 and over
Owned	76.34%	74.84%	68.20%
Rented from council	9.54%	10.42%	11.99%
Other social rented	7.75%	8.79%	11.66%

(Source: www.poppi.org.uk - Office of National Statistics Census Crown Copyright 2018)

5.7 Home ownership, is the tenure of choice of a significant proportion of the older people of West Oxfordshire, a tenure the majority will wish to maintain in accommodation and care facilities are available to them in advanced old age.

Section Summary

5.8 West Oxfordshire follows but exceeds the national trend toward owner-occupation as the dominant tenure for older people. Levels of owner-occupation among older people in the district are above national averages at 81.53% for those between 65 and 74 years of age. In the oldest age group the level of home ownership may be depressed by lack of options for owner-occupation in specialised accommodation but remains just below 72%.

6 The current supply of specialised accommodation for older people

6.1 The profile of the current supply of specialised accommodation for older people within the West Oxfordshire is highly unusual. Even taking Age Exclusive and Conventional Sheltered Housing together there is a relatively limited number of units for social rent. There is a higher level of leasehold provision of comparable stock than national averages. This pattern is readily explained by the overwhelming dominance of home ownership as the tenure of choice among older people within the area. The number of units in each style of provision and tenure are set out in Table Thirteen.

6.2 Taking the various forms of sheltered and retirement housing offered either to rent or to buy there appear to be currently around 1,158 units of accommodation. To achieve comparability this supply has been expressed as a ratio to the size of the population of older people in the borough.

6.3 Various thresholds have been used but that which is generally recognised as having the greatest relevance is that for the number of people 75 years of age or older. There are around 101.58 units of any type in any tenure per thousand of the population in this age category in West Oxfordshire.

6.4 This compares with benchmark figures derived from the data base of the Elderly Accommodation Counsel, which is the source relied upon by the Department for Communities and Local Government. These provide a national average ratio of provision of 118.4 per thousand of those 75 years of age and over.

6.5 There is a marked disparity in the availability of specialised housing for older homeowners compared with the supply available to older people in other tenures.

6.6 With just 601 units of retirement housing of all types for sale for a population of home-owners of 75 years of age or more of approximately 8,700 the ratio of provision for retirement housing for sale per thousand is 69.08.⁸

6.7 The comparative figure for those 75 years of age or more who are in rented tenures the ratio per thousand is 176.67 (477 units for approximately 2,700 persons 75 years of age or more in tenures other than home ownership.)

⁸ Among persons 75-84: 7,900 persons, 78.25% are home owners + persons 85+: 3,500 persons, 71.95% are home owners = 8,700 home owners 75+.

Table Thirteen Provision of place for older people in (West Oxfordshire) 2019

	Number of units/ places	Per 1,000 of the population 75 years and over (11,400)
Age Exclusive and Sheltered Housing for social rent	273	23.95
Enhanced sheltered Housing for social rent	0	0.0
Extra Care Housing for social rent and shared ownership	204	17.89
Total housing to rent - all types	477	41.84
Age Exclusive and Sheltered Housing for leasehold sale	476	41.75
Enhanced sheltered Housing for leasehold sale	146	12.81
Extracare Housing for leasehold sale	59	5.17
Total Housing for Leasehold - all types	601	52.72
Total Sheltered - all types, all tenures	1,158	101.58
Registered Care places offering personal care	278	24.38
Registered Care places offering nursing care	896	78.60

(Source: Contact Consulting from EAC database)

6.8 It is clear from the levels of home ownership in succeeding cohorts that the level of those in old age who are homeowners will be maintained. The majority of those entering old age as homeowners will wish to maintain that tenure and there are sound economic arguments for the individual and for the public purse to support that.

6.9 To enable older people to exercise that choice, to meet the needs of older people for specialist accommodation in their tenure of choice, and to encourage older people to make a capital investment in their accommodation in old age the local authority needs to facilitate increased leasehold provision of suitable accommodation.

6.10 Places in Registered Care Homes offering personal care per thousand in West Oxfordshire are significantly below average levels of provision for England,

with 278 beds, or 24.38 per thousand of the population seventy-five years of age and over, compared with the average for England of 45.86.

6.11 In Registered Care Homes offering nursing care the ratio of places to population is very significantly above the average for England by around 75% (78.60 per thousand 75 years of age or over compared with the national average of 45.0).

6.12 Table Fourteen provides the reference ratios for England drawn from the Elderly Accommodation Database, the source used by the Department for Communities and Local Government and the Department of Health. These do not differentiate between Age Restricted accommodation, which is often accommodation built and formerly operated as sheltered housing but now with reduced levels of on-site service, conventional sheltered or retirement housing and enhanced forms of sheltered housing that are something less than Extra Care.

Table Fourteen Provision of places for older people in England

Categories of provision	Number	Ratio of provision per 1,000 persons 75 years of age and over
Sheltered housing for rent	351,935	80.4
Retirement Housing for leasehold sale	111,074	25.37
All Sheltered / Retirement Housing	463,009	105.77
Extra Care Housing for Rent	43,293	9.89
Extra Care Housing for leasehold sale	12,004	2.74
All Extra Care Housing	55,297	12.63
Registered Care Home beds offering Personal Care	200,769	45.86
Registered Care Home beds offering Nursing Care	196,988	45.00

(Source: EAC Database, Re-formatted by Contact Consulting)

Section summary

6.13 Taking tenures together and comparing with the whole population it would appear that levels of provision of specialised housing for older people are below national averages in relation to social rented stock and above national averages in relation to retirement housing offered for market sale.

6.14 Whilst there is a substantial supply of leasehold retirement housing this comes nowhere near reflecting the dominance of owner-occupation among the older population of West Oxfordshire. There is a consequent shortfall in the level of provision needed to achieve an adequate supply for older homeowners wishing to maintain their tenure when transferring to specialised accommodation. For those older people who are owner-occupiers the ratio of provision for retirement housing for sale per thousand is 69.08. Whilst for those older people who are renters the comparable ratio per thousand is 176.67.

6.15 Whilst the levels of provision of Extra Care Housing at social rent or shared ownership, and that more limited supply offered for leasehold purchase are close to the national averages this does not reflect the need for such accommodation.

6.16 Although the level of provision of bed spaces in Registered Care Homes providing Personal Care is very significantly below national averages this is more than balanced by the high level of provision of beds registered for the delivery of Nursing Care. This is a care economy with a heavy dependence on Nursing Care beds, which runs counter to national and local policy priorities.⁹

6.17 The provision of a more adequate supply of retirement accommodation of all kinds for homeowners will provide an environment of choice in which independence can be sustained and transfer to expensive Registered Care postponed or avoided. The development proposed by Inspired Villages will contribute toward this more adequate level of provision for older homeowners.

⁹ See, for example, the Oxfordshire Market Position Statement from Oxfordshire CCG and Oxfordshire County Council, published in August 2019.

7 Understanding the development of accommodation and care options for older people

7.1 The traditional accommodation and care pathway for those passing through old age took shape in the 1950s as the health and social care reforms of 1940s that shaped health and social care were matched by developments in specialised accommodation for older people. This pathway starts with those living in general housing, moves through sheltered housing and then crosses the threshold of institutional care provision into residential care and then nursing home care. Beyond this might lie long-term hospital care but this was largely removed from the range of provision with the closure of long-stay geriatric hospital wards in the 1970s.

7.2 Progression through these categories of provision was prompted by assessment of functional deficit or deterioration of health. This is marked by a regression trade-off between access to care and quality of living conditions. Thus those who needed care accessed it by surrendering the space, privacy and independence of general or sheltered housing for the bed space, locker and shared facilities of residential or nursing care.

7.3 The linkage between accommodation context and a “blanket” pattern of care in the traditional pattern of accommodation and care services is shown in Figure Two

Figure Two The traditional configuration of accommodation and care for older people

Accommodation Context	Characteristics
General Housing	Community personal social care. Community medical, nursing and para-medical services. Meals on wheels. Provision on demand according to need.
Sheltered Housing	As above but with support from a warden, generally resident on site. Provision on demand according to need.
Residential Care	Intensive personal social care. Community medical and para-medical services. All meals provided. “Blanket” provision.
Nursing Homes	Intensive nursing and personal social care. Special arrangements for medical and para-medical services. All meals provided. “Blanket” provision.

7.4 Through the 1970s and 1980s the main focus in making provision for older people was through the development of sheltered housing, originally, and predominantly, for social rent. In the 1980s pioneer private developers began to produce a very similar model of retirement housing for sale by long lease to older home owners.

7.5 From the peak of its popularity in the late 1970s sheltered housing for rent has experienced something of a reversal in fortunes. Some schemes have proved difficult to let and in others existing facilities and patterns of service have been found to have limitations in coping with the needs of an ageing and increasingly frail tenant population.

7.6 Through the 1990s, policy and investment decisions at national and local levels began to be influenced by the general perception that in most parts of the country there was a sufficient supply of conventional sheltered housing but that opportunities existed to add to the stock of Very Sheltered, or Extra Care Housing. This was substantiated in McCafferty's 1994 study for the Department of the Environment¹⁰ which concluded that there was "a significant unmet need for very sheltered housing and a potential over-provision of ordinary sheltered housing". Little new sheltered housing for rent has been built in the past twenty-five years although demand for retirement housing for sale has continued to be strong with that majority of older people who are now home-owners.¹¹

7.7 Alongside this rise and partial decline in the popularity of sheltered housing, at least in the social rented sector, there has been a similar rise and fall in the fortunes of Residential Care. The roots of residential care in the public sector may be traced beyond the 1948 National Assistance Act¹² to Poor Law provisions stretching back into the nineteenth century. Much of the older provision was replaced in the 1960s and 1970s with subsequent legislation and practice leading to improvements in standards. The introduction of new regulatory regimes from 2002 with the requirement to meet new standards both for services and facilities has re-shaped the pattern of provision. However, many commentators would see this style of provision as a dated model for care that places over-emphasis upon dependency

7.8 Residential care in the private sector also has a long history. Until the 1980s much of the residential care provided in the private sector was for those able to meet their own care costs. The unintended consequence of changes in regulations in the early 1980s, so that financial support from public funds was available to those cared for in private residential care homes, was an enormous increase in the sector. Some homes are almost wholly dependent upon residents

¹⁰ McCafferty P 1994 Living Independently: a Study of the Housing Needs of Elderly and Disabled People, HMSO

¹¹ A national average of 75% of households with a head 65 years of age or over according to the 2011 Census.

¹² National Assistance Act 1948, section 21.

funded by the local authority and most would say that their fee levels are heavily influenced by local authority levels.

7.9 Some contraction continues to be apparent in parts of the residential care home sector. Many local authorities have withdrawn from the direct provision of residential care, once a major element in the pattern of provision. Whilst some have sold homes to private sector operators or to voluntary sector organisations others have deliberately reduced capacity by closing homes. There has been a marked reduction in provision by very small operators providing less than twenty beds, generally in converted dwelling houses. Capacity within the care home sector is being maintained by the development of larger, purpose-built care homes that meet modern standards and operate at a level that supports their viability.

7.10 Like private residential care, private nursing homes have been in existence for many years but only in the last thirty years have they been generally accessible to people needing public funding to meet the cost of their care. The growth of this sector was promoted by two principal factors:

- The availability of public funds to support care costs.
- The general withdrawal of provision for in-patient chronic care of older people within the NHS.

7.11 Some larger nursing homes have been developed specifically as re-provision following the closure of long-stay wards in NHS hospitals. The closures have followed upon a concentration within NHS hospitals on acute care and the conviction that a hospital ward does not provide an appropriate setting for long term care. Nursing Homes generally provide for those who have some need for frequent nursing attention in addition to personal care, but a level of care that does not require the constant supervision of a medically qualified person.

7.12 Changes in regulation for both residential and nursing homes in the Care Standards Act (2000) introduced a single registration of Registered Care Home, with the distinction that beds might be registered for the provision of personal care or for the provision of nursing care. Public funding for those allocated to Registered Care Home places is increasingly restricted to those experiencing extreme physical frailty or living with some level of confusional state such as dementia.

7.13 The traditional role of residential care homes has largely been taken over by the hybrid model of Extra Care Housing in its various forms. The debate around how Extra Care might be defined has been carried on between academics, commissioners and providers for most of the past decade¹³. Fundamentally there are two schools of thought:

¹³ See for example Appleton N: Extra Care Housing for Older people, Care Services Improvement Partnership Housing LIN 2009

- Those whose main driving criterion is the capacity of Extra Care to provide an alternative to Residential Care.
- Those whose aspiration is more toward the development of a model that enhances the lifestyle of older people but with the capacity to deliver care.

7.14 At the extreme end of the first school of thought there are those who feel that allocation to Extra Care should only be available to those with care needs that would otherwise be sufficient to merit placement and public expense in residential care. In describing Extra Care, their emphasis is upon those facilities that will support the delivery of personal care and possibly primary health care: assisted bathing facilities, treatment rooms and so on. In staffing, the emphasis is upon on-site care teams as the pre-eminent requirement.

7.15 The emphasis upon the substitution for allocation to a Registered Care Home reflects a narrower set of assumptions about the benefit to individuals and communities that can arise from a move to Extra Care. They take no account, for example of the benefits to mental health and well-being, or to the preventative aspects of an environment that reduces the incidence of falls.

7.16 Those who take the alternative stance emphasise the need to make Extra Care a good place to live, think in terms of a balanced community in relation to care needs, and give prominence to facilities that support an active and positive lifestyle: an exercise suite and spa bath, a coffee bar and perhaps licensed bar, facilities for arts and crafts; all supported by appropriate staffing. Whilst they include the care facilities and staffing, they are matched by these lifestyle requirements if the scheme is to be considered as truly Extra Care.

7.17 Whilst declining to offer a definitive description of Extra Care the Department of Health has promoted the development of Extra Care schemes, not least through successive programmes of capital grant, and this has been supported by the identification of “key characteristics” to be expected in an Extra Care development¹⁴.

7.18 These include the provision of private apartments, with associated communal facilities and services that support independence and dignity, whilst encouraging well-being. These serve as “minimum standards” for a development to be recognised as Extra Care and, where funding permits, Extra Care schemes may include a wide range of recreational, cultural and social amenities.

7.19 The planning application for Wroslyn Road, Freeland proposes the development of high-quality retirement accommodation and related facilities that

¹⁴ Funding Initiative to stimulate provision and modernization of Specialised Housing for older people. October, 2012

reflects the philosophy of the model for Extra Care housing advocated by the Department of Health.

7.20 The services on offer to residents will provide support designed to assist them in maintaining a degree of independence, and to foster a community spirit. This reflects the philosophy and model of ageing that undergirds the proposed development: that enhances capacity rather than stressing incapacity, that offers a bespoke pattern of support that lengthens the period of independence and manages the transition into higher levels of dependency without compromising dignity and quality of life.

8 The benefits to health and social care of specialised housing for older people

8.1 Whilst the benefits to older people of moving to Extra Care have been asserted since the model began to be developed, research to quantify that benefit over a range of domains has been slower to emerge. More recently the focus of research has widened from examining the beneficial impact on the health and well-being of the individual residents to the impact such developments may have on health and social care services.

8.2 The recent report of the Communities and Local Government Select Committee on the future of housing for older people¹⁵ cites evidence of benefit, not only to individuals, but also to the Health and Social Care economy. The report asserts:

“There is a significant body of evidence on the health and wellbeing benefits to older people of living in specialist housing and the resultant savings to the NHS and social care. This is particularly the case for extra care housing, which has onsite care and support and communal facilities. In addition, this type of housing helps family and carers finding it challenging to provide enough care and support”. (Para 87)

8.3 The report by the International Longevity Centre, reported in our review appended, is referenced by the Committee:

“Research by the International Longevity Centre-UK found that around a quarter of people who moved into extra care housing with social care needs (or went on to develop them) experienced an improvement within five years, were less likely to be admitted to hospital overnight and had fewer falls. Subsequent research found that, in comparison to older people in the general community, extra care residents reported having a higher quality of life, a higher sense of control and lower levels of loneliness”. (Para 88)

8.4 The report goes on to refer to evidence provided to the Committee by Professor Holland of Aston University. Drawing on the findings of her three-year study of residents of Extra Care developments managed by the Extra Care Charitable Trust she quantified the estimated benefit to the health and social care economy. The Committee accepts that:

¹⁵ House of Commons Communities and Local Government Committee Housing for older people Second Report of Session 2017–19 Report, together with formal minutes relating to the report Ordered by the House of Commons to be printed 5 February 2018

“Professor Holland’s study found that the NHS costs for those in the sample were reduced by 38% and that the costs for frail residents had reduced by 51%. In addition, local authority costs of providing lower and higher level social care were 17.8% (£1,222) and 26% (£4,556) lower respectively on average per person per year. With regards to retirement housing, research from the University of Reading showed that it can help combat social isolation and promote fitness, with over 80% of owner occupiers of retirement housing taking part reporting feeling happier in their new home and nearly a third feeling that their health had improved. (Para 88)

8.5 The Committee sets out its conclusions in unambiguous terms:

“Specialist housing, and particularly extra care housing, can promote the health and wellbeing of older people and their carers, leading to savings in spending on health and social care.” (Para 91)

8.6 The Aston University research did establish a range of benefits in health and well-being among the Extra Care residents when compared with the Control Group. From this they have generated projected savings to local services which were referenced by the CLG Select Committee.

8.7 The Aston Study reports:

“NHS Costs – Comparing Extra Care and Control Participants: Total NHS costs were estimated for each participant, including practice and Borough nurse, GP and outpatient appointments as well as admissions. Average ExtraCare resident NHS costs reduced by 47% over 12 months. Control NHS costs reduced by 14.1%. BUT when you control for the fact that the more poorly are the people who left the sample this is a 38% reduction, (still a significant reduction). This equates to an average saving of £1114.94 per person per year.”

8.8 More difficult to quantify are the additional savings that arise from slowing the progression of residents to higher levels of frailty, and therefore of need for services, through the mitigation of risk through design, and contribution to well-being through services and activities that the scheme will provide. The Aston study reports:

“The reduction for the frail residents was the most striking: for those in the sample at baseline and follow-up, this changed from an average of £3274.21 to £1588.04 average per person. That is, a 51.5% drop. Use of this figure needs to bear in mind that the frailest within this group are those who have died or dropped out of the study.”

8.9 Savings in Social Care costs falling upon the public purse are more difficult to extrapolate from the Aston research. Whilst all residents may be expected to qualify for NHS services without financial contribution the majority will be self-funders in relation to social care. Thus, the savings identified in the report may benefit individuals, savings for statutory social services will not be comparable to those achieved in schemes operated by the Extra Care Charitable Trust where the majority of residents would be of more limited means.

8.10 When compared with the current dominant option of a place in a Registered Care Home the medium to long-term risk of residents using up their financial resources and becoming dependent upon statutory financial support in an Extra Care setting are much reduced. This is a consequence of the differential levels of cost and the cost models referenced in Section Three preceding.¹⁶

8.11 We direct attention to the review of accepted by the CLG Select Committee, that there are both benefits to individual residents and to the local Health and Social Care economy through provision of the option of Extra Care for older people in West Oxfordshire.

¹⁶ Para 3.14

9 The case for the development in national policy and guidance

9.1 National policy guidance has been consistent through successive administrations. The foundations for the current direction of travel was set by Labour administrations, carried forward by the Coalition Government and reconfirmed by the current administration in the 2017 Housing White Paper. The headlines of this consensus have been to encourage the maintenance of independence for older people for as long as possible, retaining them in their own homes where possible. Where a move is required to meet care needs the preference has been for Extra Care rather than increasing dependency on registered care homes.

Laying the Foundations: A Housing Strategy for England, 2011, DCLG¹⁷

9.2 Half of all households in England are older 'established homeowners'. Some 42 per cent are retired and 66 per cent own their own home outright. As life expectancy increases, more of these households will need support to remain in their homes in later life. Limited choice in the housing market makes it difficult for older households to find homes that fully meet their needs.

9.3 The Government is committed to ensuring that housing and planning policies positively reflect the wide range of circumstances and lifestyles of older people, who already occupy nearly a third of all homes. Nearly two thirds (60 per cent) of the projected increase in the number of households from 2008–33 will be headed by someone aged 65 or over.

9.4 Planning homes and communities that enable older people to remain economically active, involved with their families, friends and community and able to choose where and how they live not only makes financial sense but also results in a better, more inclusive society.

9.5 Good housing for older people can enable them to live healthy, independent lives and reduces pressure on working families in caring for older relatives. It can also prevent costs to the NHS and social care. For some older people a move to a smaller, more accessible and manageable home can also free up much-needed local family housing.

¹⁷ www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf (Accessed 11/01/2017)

Laying the Foundations: A Housing Strategy for England, 2011, DCLG. Page 2. Para. 3. Page 48. Para's 6-8. Page 49. Para 8.

9.6 New housing developments also need to make suitable provision for our ageing population in the long term. Ensuring a mix of property types, including Lifetime Homes, will help to provide the diversity and choice needed to support longer term independent living. The Lifetime Homes standard is widely adopted in mainstream housing developments and incorporates a range of features which makes homes more accessible and easily adaptable. Future needs will vary considerably at a local level and the number of Lifetime Homes within each development should be made at a local level, in proportion to local need and aligned with other local housing support and information services

Funding Initiative to stimulate provision and modernization of Specialised Housing for older people.

October, 2012¹⁸

9.7 In October, 2012 Care and Support Minister Norman Lamb announced a renewal of funding to encourage the provision, or modernisation, of specialised accommodation for older people. Local authorities were encouraged to bid for part of a £300 million pot of money which will boost the supported housing market and help people grow old in their own homes. The aspiration of the initiative was that it should help create thousands of extra houses and flats specially designed for the needs of disabled and older people who need extra support. The Minister recognised that high quality, innovative housing can help people stay independent for longer by allowing them to receive care and practical help in their own home, reducing the need for them to go into care homes. Specialised housing available for owner occupation or shared ownership was a particular target for this initiative.

9.8 The broader benefit of freeing family sized housing in all sectors was endorsed by the recognition that specially designed housing of this kind can give people the option to downsize from a larger home to a more manageable property designed for their needs.

Market assessment of housing options for older people,

Pannell J, Aldridge H and Kenway P, May 2012, New Policy Institute.¹⁹

9.9 The study focused on the 7.3 million older households in mainstream or specialist housing in England (excluding care homes) which contain no-one below the age of 55.

¹⁸ www.gov.uk/government/uploads/system/uploads/attachment_data/file/377023/care_and-support_specialised_housing_fund_prospectus.pdf (Accessed 11/01/2017). **Care and Support Specialised Housing Fund Prospectus**. October 2012. Department of Health, Homes & Communities Agency.

¹⁹ www.npi.org.uk/files/5213/7485/1289/Market_Assessment_of_Housing_Options_for_Older_People.pdf (Accessed 11/01/2017) **Market assessment of housing options for older people**, Pannell J, Aldridge H and Kenway P, May 2012, New Policy Institute.

- Around one-third of all households are older households. This proportion applies across most regions except for the South West (40 per cent) and London (22 per cent).
- 76 per cent of older households are owner-occupiers and most own outright; 18 per cent are housing association or council tenants, while 6 per cent are private sector tenants.
- 42 per cent of older households aged 55 to 64 are single, and this proportion increases with age.
- About 7 per cent of older households (530,000) live in specialist housing where a lease or tenancy restricts occupation to people aged over 55, 60 or 65. Most of these schemes are provided by housing associations and offer special facilities, design features and on-site staff. Around 10 per cent of specialist dwellings are in schemes offering care as well as support.
- 93 per cent of older people live in mainstream housing. As well as 'ordinary' housing, this includes housing considered especially suitable for older people due to dwelling type (e.g. bungalows), design features (including 'lifetime homes') or adaptations (e.g. stair lifts).

9.10 Supply of and demand for specialist housing: the research confirmed that there is limited choice for older people who want to move to both specialist and alternative mainstream housing, in terms of tenure, location, size, affordability and type of care or support. Despite the majority of older people owning their homes outright, 77 per cent of specialist housing is for rent and only 23 per cent for sale. There are significant regional variations: the extremes are the North East (only 10 per cent for sale) and the South East (37 per cent for sale).

9.11 There has been recent interest, but slow progress, in developing different housing options for older people and in integrating these within mainstream new housing developments (which could attract older people who prefer to remain in mixed-age communities). There is extensive evidence on what older people are looking for and whether they stay put or move. Two bedrooms is the minimum that most older people will consider, to have enough space for family visitors, a carer, storage, hobbies, or separate bedrooms for a couple. Analysis of moves by older households in the last five years within the private sector (rent or owner-occupier) shows that 87 per cent move into a dwelling with two or more bedrooms. Yet much specialist housing is small (one-bedroom or sheltered bedsits). Some specialist housing is poorly located and there have been concerns about withdrawal of scheme-based staff. Depending on the method of estimation used, the projected growth in the older population requires an increase in the stock of specialist housing of between 40 per cent (200,000) and 70 per cent (350,000) over the next 20 years.

National Planning Policy Framework, July 2018²⁰

9.12 The Government updated the National Planning Policy Framework published in 2012 with the publication of a new Framework Document in July 2018. In relation to the needs of older people it has little directly to say, beyond including them in the list of those whose particular accommodation needs should be taken into consideration in forming local plans.

“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, **older people**²¹, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”
(Para 61)

9.13 The volume, location and characteristics of new homes to be provided, including those intended for occupation by older people, has to be assessed, using one of the methodologies identified in guidance:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” (Para 60)

9.14 Alongside the economic and environmental objectives of the planning process the introduction to the Framework identifies a “social objective”

“b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;” (Para 8 b)

²⁰ Nation Planning Policy Framework, Ministry of Housing, Communities and Local Government, July 2018, Cm 9680

²¹ The Glossary to the NPPF provides the following definition for “Older People” within the Framework and Guidance:

“**Older people:** People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”

Planning Practice Guidance, September 2018²²

9.15 Planning Practice Guidance has been updated to reflect the priorities of the new National Planning Policy Framework issued in July 2018 and cited above. The Guidance seeks to mitigate the negative effect on the estimation of future housing need of the most recent population projections issued by the Office for National Statistics in May 2018. These suggest both total populations and the rate of ageing in local populations to be advancing at a slower rate than previously predicted. If this were used to reduce housing targets this would be in direct opposition to the policy priority of Government to increase housing supply over the next few years.

9.16 Within the section “How should the needs for all types of housing be addressed?” the Guidance draws attention to the importance of taking the needs of older people into account:

“The need to provide housing for older people is critical as people are living longer lives and the proportion of older people in the population is increasing. The National Planning Policy Framework glossary provides a definition of older people for planning purposes, which recognises their diverse range of needs. This ranges from active people who are approaching retirement to the very frail elderly. The health and lifestyles of older people will differ greatly, as will their housing needs. Strategic policy-making authorities will need to determine in relation to their plan period the needs of people who will be approaching or reaching retirement as well as older people now.”

9.17 In relation to estimating the needs of older people in the section “How should the needs for all types of housing be addressed?” the Guidance offers the suggestion that, in addition to considering the need for general housing that allows older people to age in place, planners will need to have regard to the different styles of specialised accommodation for older people, reflecting the diversity of need and preference within the older population. Using Census data as their starting point planners may use one of a number of on line toolkits:

“The age profile of the population can be drawn from Census data. Projection of population and households by age group can also be used. Strategic policy-making authorities will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services and providing more options for older people to move could also free up houses that are under occupied.”

²² Nation Planning Practice Guidance, Ministry of Housing, Communities and Local Government, September 2018,

The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards also provide useful evidence for plan-making authorities. The assessment can also set out the level of need for residential institutions (Use Class C2). Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities will therefore need to identify the role that general housing may play as part of their assessment.”

Planning Practice Guidance, June 2019²³

9.18 This guidance seeks to assist Local Planning Authorities in preparing planning policies on housing for older and disabled people. It sets out the reasoning behind drawing particular attention to the needs of older and disabled people:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”

9.19 The guidance recognises that this is a diverse population with a diversity of needs and aspirations which will change as they move through old age:

“The National Planning Policy Framework glossary provides definitions of older people and people with disabilities for planning purposes, which recognise the diverse range of needs that exist. The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people.”

²³ <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

9.20 The Guidance suggests that population data is the starting point for estimating future needs for a range of accommodation and housing related services to meet the needs of older people. It makes reference to a range of methodologies (which includes the methodology adopted in the preparation of this report) but specifically references only the SHOP@ Tool. The SHOP@ tool, like others, requires judgement concerning the assumptions that guide its set-up. None of the methodologies are neutral as all are influenced by the policy and other assumptions used. The Guidance makes only passing reference to the need for Registered Care Homes when most Adult Social Care authorities will wish to depress the expansion of Registered Care Homes in favour of increasing capacity in housing-based models:

“The age profile of the population can be drawn from Census data. Projections of population and households by age group can also be used. The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can also be useful. The assessment of need can also set out the level of need for residential care homes.”

9.21 The Guidance sets out a condensed range of categories of specialised provision for older people which, in some circumstances, could be unhelpful, blurring as it does the gradations that exist in the capacity of different models to offer a robust response to increasing levels of need. The authors acknowledge the limitations of what is provided:

“There is a significant amount of variability in the types of specialist housing for older people. The list above provides an indication of the different types of housing available, but is not definitive. Any single development may contain a range of different types of specialist housing.”

9.22 The Guidance makes it clear that Local Plans should respond to evidence of need by facilitating appropriate provision:

“Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate.”

9.23 The requirement for specialised accommodation is rightly set within a context of ensuring that general housing is also sensitive to the needs of an ageing population:

“Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.”

This rubric should not however be seen as an encouragement to “talk-down” the need for specialised accommodation.

9.24 Clearly the emphasis is upon ensuring that older people have choice within a range of options:

“Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish”.

9.25 The Guidance takes a neutral stance on the issue of allocating sites for specialised housing for older people but sets out some possible criteria for site selection. The thinking behind these seems to be limited as some larger developments will be viable and attractive options for older people without the proximity to some existing local facilities the Guidance suggests:

“It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres.”

9.26 The Guidance effectively ducks the opportunity of offering more helpful guidance on the matter of Use Class and makes no mention of the application or otherwise of affordable housing requirements to developments of specialised accommodation for older people:

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

9.27 The Guidance does offer a strong steer toward the meeting of unmet need for specialised accommodation for older people:

“Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”

Care Act, 2014²⁴

9.28 The Care Act 2014 sought to set a new baseline in relation to the provision of social care for adults. It re-defines roles, responsibilities and boundaries, setting out arrangements for the new world of personal budgets.

9.29 A priority within the Act was promoting inter-agency collaboration, both between Adult Social Care and Health and with other agencies, such as housing, in statutory, commercial and third sectors. It places a strong emphasis on services that contribute to well-being and delay or divert the requirement for more intensive forms of care.

Fixing our broken housing market. February 2017²⁵

9.30 In relation to the assessing of housing requirements the White Paper asserts that the current system is complex and lacks transparency. The need for a more consistent approach and one that takes account of the needs of particular groups within each community with older people being particularly mentioned:

“The current approach to identifying housing requirements is particularly complex and lacks transparency. The National Planning Policy Framework (NPPF) sets out clear criteria but is silent on how this should be done. The lack of a standard methodology for doing this makes the process opaque for local people and may mean that the number of homes needed is not fully recognised. It has also led to lengthy debate during local plan examinations about the validity of the particular methodology used, causing unnecessary delay and wasting taxpayers’ money. The Government believes that a more standardised approach would provide a more transparent and more consistent basis for plan production, one which is more realistic about the current and future housing pressures in each place and is consistent with our modern Industrial Strategy. This would include the importance of taking account of the needs of different groups, for example older people”. (Para 1.2)

²⁴ www.legislation.gov.uk/ukpga/2014/23/contents/enacted (Accessed 11/01/2017) **Care Act 2014**

²⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

9.31 In a subsequent section further reference is made to the need to take account of the needs of an ageing society

“Whatever the methodology for assessing overall housing requirements, we know that more people are living for longer. We propose to strengthen national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.” (Para 1.16)

9.32 The White Paper embraces the proposition that an appropriate range of options in accommodation for older people not only supports a better quality of life for older people it also offers benefits to the health and social care systems:

“Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services. It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people”. (Para 4.42)

9.33 In the following paragraph the benefit of encouraging older people to move and release under-occupied property back into the market is also recognised as a worthwhile goal:

“Helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers. However there are many barriers to people moving out of family homes that they may have lived in for decades. There are costs, such as fees, and the moving process can be difficult. And they may have a strong emotional attachment to their home which means that where they are moving to needs to be very attractive to them and suitable for their needs over a twenty to thirty year period. There is also often a desire to be close to friends and family, so the issues are not straightforward”. (Para 4.43)

9.34 In addition to setting out plans to consult with a wide range of stakeholders to bring forward new ideas in relation to the housing and support of older people,

the White Paper contains a commitment that the Government will go on funding the various forms of specialised housing for older people:

“These (*stakeholder consultations*) will sit alongside the Government commitments to fund and develop supported housing, including sheltered, step down and extra care housing, ensuring that the new supported housing funding model continues to provide the means for older people to live independently for longer while relieving pressure on the adult social care system”. (Para 4.44)

10 The context in local policy

Oxfordshire Strategic Housing Market Assessment Final Report 2014²⁶

10.1 In referring to the SHMA Guidance the Report recognises that the Guidance directs attention toward the need to provide housing for older people as part of achieving a good mix of housing and notes that “a key driver of change in the housing market over the next 20 years is expected to be the growth in the population of older persons”.

10.2 In describing the population of older people within South Oxfordshire the SHMA refers to the use of data from POPPI (Projecting Older People Population Information), the source upon which this report relies in following sections.

10.3 The SHMA also draws attention to the role of appropriate specialised housing for older people in addressing the issue of under-occupation among older people:

“A key theme that is often brought out in Housing Market Assessment work is the large proportion of older person households who under-occupy their dwellings. Data from the Census allows us to investigate this using the bedroom standard. The Census data suggests that older person households are more likely to under-occupy their housing than other households in the County. In total 61% have an occupancy rating of +2 or more (meaning there are at least two more bedrooms than are technically required by the household). This compares with 35% for non-pensioner households. “ (8.16)

10.4 reviewing the evidence on under-occupation by tenure the SHMA observes:

“Whilst the majority of older person households with an occupancy rating of +2 or more were in the owner-occupied sector, there were around 1,800 properties in the social rented sector occupied by pensioner only households with an occupancy rating of +2 or more. This may therefore present some opportunity to reduce under-occupation although to achieve this it may be necessary to provide housing in areas where households currently live and where they have social and community ties.”²⁷

²⁶

<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/our-work-with-communities/oxfordshire-partnership/spatial-planning-infrastructure/Final%20SHMA%20Report.pdf>

²⁷ Current author’s emphasis

We draw attention to the final sentence which hints at the need for provision for older people, regardless of tenure, to be appealing to those whom it seeks to attract from their current home.

10.5 The SHMA sets out county-wide targets for specialised accommodation for older people, arriving at these through standard industry estimating tools linked to those referenced in our own estimates in Section Eight of this report:

“Given the ageing population and higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward. The analysis in this section draws on data provided by the County Council and the Housing Learning and Information Network (Housing LIN) along with our demographic projections to provide an indication of the potential level of additional specialist housing that might be required for older people moving forward.” (8.23)

10.6 Their analysis shows that, even to maintain current ratios of supply to population, substantial new provision will be required:

“The analysis shows to maintain the current level of provision there would need to be a further 5,564 units provided – this figure increases to 8,958 if the level of provision were to get to the national average.” (8.27)

10.7 The projections do not carry through to setting targets for specific styles of provision for older people, and suggest that some need might be met through General Needs housing designed to Lifetime Homes standards:

“The analysis above is not specific about the types of specialist housing that might be required; we would consider that decisions about mix should be taken at a local level taking account of specific needs and the current supply of different types of units available. There may also be the opportunity moving forward for different types of provision to be developed as well as the more traditional sheltered and Extra-Care housing.” (8.30)

10.8 The SHMA notes the imbalance between tenures in current supply to which we shall draw attention in Section Seven and suggests that “greater emphasis could be placed on market specialist provision than has been the case in the past”:

“Regarding the tenure mix; we have noted that at present there is a much higher level of supply in the affordable sector than for market housing whereas the majority of older person households are owner-occupiers. This would suggest moving forward that a greater emphasis could be placed on market specialist provision than has been the case in the past.” (8.34)

Joint Strategic Needs Assessment (Draft) 2020²⁸

10.9 The Annual Report identifies a number of key demographic factors impacting on the assessment of need:

“Oxfordshire’s population is ageing, with substantial recent and predicted growth in the number of older people.

- People aged 65+ made up 20% of Oxfordshire’s four rural districts, compared with 12% of the population of Oxford City (18% overall).
- For people aged 75+, cancer remains the leading cause of death. There has been a significant increase in deaths recorded as a result of Dementia and Alzheimer’s disease.
- Falls are the largest cause of emergency hospital admissions for older people (65+); Oxford City has a rate consistently significantly worse than England.
- Fear of falls is the top concern among older users of adult social care services.
- The rate per population of A&E attendance by Oxfordshire patients has increased fastest in the older age group (65+). Health and wellbeing in Oxfordshire – older people
- Almost two thirds of older people are estimated to be self-funding long term care in Oxfordshire.
- Wide areas of rural Oxfordshire are ranked poorly on geographical access to services according to the geographical access to services subdomain of the 2019 Indices of Multiple Deprivation.
- Close to a quarter (23%) of people aged 85+ live in areas of Oxfordshire ranked in the 10% most deprived on access to services.”

10.10 The continuing growth in the numbers of those living into advanced old age is further emphasised:

²⁸ https://insight.oxfordshire.gov.uk/cms/system/files/documents/2020_JSNA_DRAFT.pdf

“The oldest age group, those aged 85 and over, is predicted to increase from 18,000 in mid 2019 to 21,300 by mid 2027, an increase of 3,300 people (+18%)

- The areas with the greatest growth in the number of people aged 85 and over are expected to be:
- Rural areas of Vale of White Horse district
- Part of Banbury
- Parts of Abingdon
- Part of the area around Eynsham and parts of Witney
- Rural areas of South Oxfordshire (Chalgrove, Chinnor, Cholsey)”

Oxfordshire's Joint Health & Wellbeing Strategy 2018 - 2023 Final version, March 2019²⁹

10.11 The Joint Health and Well-Being Strategy the challenges that the statutory services in Oxfordshire face:

“As of mid-2016, the estimated total population of Oxfordshire was 683,2002.

- Over the ten-year period, 2006 and 2016, there was an overall growth in the population of Oxfordshire of 52,100 people (+8.3%), similar to the increase across England (+8.4%).
- The five-year age band with the greatest increase over this period was the newly retired age group 65 to 69 (+41%). There was a decline in the population aged 35 to 44.
- By 2031, the number of people aged 85 and over is expected to have increased by 55% in Oxfordshire overall, with the highest growth predicted in South Oxfordshire (+64%) and Vale of White Horse (+66%).
- Isolation and loneliness have been found to be a significant health risk and a cause of increased use of health services. Areas rated as “high risk” for isolation and loneliness in Oxfordshire are mainly in urban centres.
- Oxfordshire’s comparative rates of injuries due to falls in people aged 65+ and for people aged 80+ has recently improved, from statistically worse than average to similar to the South East average
- There has been an increase in the proportion of older social care clients supported at home, from 44% of older clients in 2012 to 59% in 2017.
- Oxfordshire County Council estimates that: of the total number of older people receiving care in Oxfordshire, 40% (4,200) are being supported by the County Council or NHS funding and 60% (6,300) are self-funding their care

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<https://www.oxfordshire.gov.uk/sites/default/files/file/constitution/oxfordshirejointwbstrategy.pdf>

- Assuming the use of health and social care services remains at current levels for the oldest age group (85+) would mean the forecast population growth in Oxfordshire leading to an increase in demand of:
 - +7,000 additional hospital inpatient spells for people aged 85+: from 12,600 in 2016-17 to 19,600 in 2031-32.
 - +1,000 additional clients supported by long term social care services aged 85+: from 1,900 in 2016-17 to 2,900 in 2031-32.”

Market Position Statement for Oxfordshire in relation to Care Provision (August 2019) and Extra Care Housing Supplement (November 2019)

10.12 The Market Position Statement deals with the need for, and provision of, various forms of care within the County of Oxfordshire. Section Six of the MPS deals with the need for Extra Care, principally to meet the needs of older people. It has been followed by a Supplement which expands Section Six of the MPS.

10.13 The targets set out for the expansion of provision deal solely with the number of units projected to meet the commissioning needs of the statutory bodies and therefore do not include any allowance for Extra care units offered to homeowners on a Market basis³⁰. The Statement is helpful in setting out the rationale for increasing supply in the social rented sector and the arguments apply also in relation to those units provided in the Market sector.

10.14 On the first page of the section the authors recognise the need for a diverse pattern of provision to respond to the diversity of need within the older population. Whilst keeping people in their own homes is identified as the first priority it is recognised that this is not always practicable or desirable. In these cases the Extra Care Housing model is the preferred response to the need for personal care and support:

“In the continuum of housing for older people we recognise that we need a range of options to meet diversity of need and give people choice. Keeping people in their own home remains our priority but where an older person has care and support needs that could be better met through specialist housing we will promote Extra Care Housing”. (p14 Para 4)

10.15 It is clear from what follows that Extra Care is seen as the appropriate response to all but the highest levels of need, effectively replacing reliance upon Residential Care:

“We intend to develop a supply of Extra Care Housing to be available in part as an alternative to care home accommodation. We envisage a model

³⁰ Verified with Gillian Douglas, Assistant Director, Housing and Social Care Commissioning, Oxfordshire County Council and Cherwell District Council, 8th January, 2020.

which includes provision for people with moderate dementia as well as those with significant care needs. Care home provision will primarily be commissioned for people with nursing needs which cannot be met at home and/or significant dementia needs.” (p16 para 2)

10.16 The authors of the MPS go on to spell out the benefits of Extra Care both to the individuals who are accommodated there and to the Public Good:

“The case for delivery of Extra Care Housing is based on achieving better health and wellbeing outcomes for older people. But there are also economic benefits with Extra Care Housing reducing the number of delayed discharges from hospital and reducing permanent admissions to care homes. If we are to make best use of the health, social care and housing system, then Extra Care Housing is an important and necessary part of the landscape.” (p14 para 7)

10.17 Where the conversation with the Assistant Director, Housing and Social Care Commissioning (referred to in the footnote below) is particularly helpful is in clarifying the opaque position set out in the text of the MPS in relation to private developments of retirement villages, such as that proposed in this application. Whilst saying that such developments are desirable and to be encouraged the authors say that they are “not included in our definition of Extra Care”. The grounds for that exclusion are not clear. The grounds for establishing that a development may properly be described as Extra Care are clear: they rest on the physical design, the range of facilities and the nature of the services available. They are certainly not defined by tenure or who develops them.

“There are also a number of private retirement villages in the county which offer older people an option to buy a property in an area well connected to local amenities. We encourage the development of private retirement villages as we recognise that these will suit the needs of many Oxfordshire residents. These are not however included in our definition of Extra Care Housing.” (p14 Para 3)

10.18 It is now clear how is this paragraph to be understood: developments that may meet the criteria to be described as Extra Care but are developed for sale are not under consideration in this document and therefore not included in their estimate of future need. The understanding of the import of this paragraph is crucial in arriving at a judgement about the adequacy of the projections of future requirements for Extra Care in Oxfordshire.

10.19 When the MPS moves to projection of future need for Extra Care there is a simple statement about the “multiplier” applied to the number of older people in Oxfordshire seventy-five years of age and over:

“We estimate that we need 25 ‘extra care units’ for every 1,000 people aged 75 and over.” (p16 Para 5)

Following the clarification offered by Gillian Douglas this now clearly refers only to units to be offered for social renting and a few shared ownership units, accommodation for which those for whom the Authority is commissioning would be eligible.

10.20 The current supply of Extra Care Units is set out in tabular form on page 15 of the MPS. Of the 932 units identified 661 or 71% are for social rent. Most of the remainder, 188 are offered on the basis of shared-ownership. This is against a background in which 71.25% of the population in West Oxfordshire aged between 75 and 84, and 71.95% of those 85 years of age and over are home owners. The current stock comes nowhere near reflecting the tenure profile of older people in the county as a whole and of West Oxfordshire in particular.

West Oxfordshire Local Plan 2031 (Adopted 2018)³¹

10.21 Eynsham Parish is recognised as one of six service centres that support the three main towns of the district (para 2.5). Eynsham is also the location of the most substantial increase in housing contained in the plan. This includes the provision of a Garden Village to the north of the A40 at Eynsham:

“A new rural service centre is proposed to be created through this Local Plan in the form of a new Garden Village on land to the north of the A40 near Eynsham and close to Hanborough Station on the Cotswold line. This could exceed a population of 4,000 by 2031 and will need to develop a critical mass of services and facilities.” (Para 2.6)

At its north-western boundary this development will abut Wroslyn Lane, Freeland allowing the proposed site for the development of retirement accommodation to relate to this new centre whilst serving the eastern area of the district which currently lacks such a facility.³²

10.22 In addition to the proposed Garden Village to the north of Eynsham further substantial increases in housing are planned for land to the west of Eynsham:

“Eynsham has a particularly important role to play because of its proximity and connections to Oxford City. A strategic urban extension of around 1,000 homes will be delivered to the west of Eynsham contributing in part

³¹ <https://www.westoxon.gov.uk/media/feyjmpen/local-plan.pdf>

³² The Draft Area Action Plan for the Garden Village is proposed for publication and consultation in August and September 2020. Earlier consultation documents sought views on the nature of provision for older people within the development (Issues Paper Question 11c).

to West Oxfordshire's own housing needs (450 homes) as well as the unmet housing needs of Oxford City (550 homes)." (Para 5.15)

In this scenario it is all the more important to increase the provision of options for older people in this area of the district.

10.23 The Local Plan recognises both the ageing of the local population and the attractiveness of the area to older people:

"West Oxfordshire has a relatively old demographic profile reflecting the fact that it is an attractive District that people wish to remain living in or retire to. Between 1981 and 2011 the proportion of residents aged 60+ increased by 82% (11,900 people) and 18% of people are currently aged 65 and over (compared with 16% nationally). 5.82 Importantly, future projections suggest that the number of older people in West Oxfordshire will continue to increase. In the period 2011- 2031, the proportion aged 55+ is projected to increase by 54% with a particularly high increase in people aged 85+ (160%). This will be coupled with a significant increase in the number of people suffering from dementia and mobility problems. By 2040, older people aged over 60 are expected to make up a third of the population. An assessment by Oxfordshire County Council of older people's needs shows that while life expectancy is rising, more people are living into older age with disabilities - so for men in West Oxfordshire, disability free life expectancy at age 65 is 11.6 years, while for women it is 11.7 years." (Paras 5.81 & 5.82)

10.24 The need for specialised accommodation, alongside services to support those older people who remain in their own homes is recognised in the Plan:

"However, not all older people will require specialist homes or provision for their needs; most of the rising number of older people will prefer to stay in the same home that they have lived in for many years. Indeed, many older people will not need, or necessarily seek, accommodation specifically for older people at any time in their lives. Generally, moves are made to a smaller home in order to reduce the costs associated with a larger family home or to move to a more accessible location closer to shops or services. Alternatively older people move to a house that is on one level or capable of a degree of adaption for mobility or health reasons, or simply to move to be closer to family members" (Para 5.83).

10.25 The role of the Local Plan in ensuring that these needs meet an appropriate and adequate response is clearly stated

"The Local Plan therefore has a key role to play in ensuring that suitable housing (and health care) is provided for older people. This is likely to be through a combination of specialist housing provision (e.g. retirement and

extracare housing) as well as ensuring that new homes are adaptable and allow people to stay in their own homes longer (eg. provision of wider doorways, lower windows etc).” (Para 5.84)

10.26 The Local Plan also explicitly acknowledges the current shortfall in supply of specialised accommodation for older people in West Oxfordshire:

“There are currently around 614 older persons housing units in West Oxfordshire the majority of which (523) are in private market schemes with the remainder (91) provided in the affordable sector.¹⁸ Relative to the District’s population this represents 66 units per 1,000 persons aged 75 and over, well below the county average (133 units per 1,000) and significantly below the national average (170 units per 1,000)” (Para 5.86)

10.27 The Local Plan sets out the scale of increase in provision that may be needed:

“There is clearly a need to boost supply. The Oxfordshire SHMA (2014) suggests that in order to achieve the current Oxfordshire average of 133 units per 1,000, an additional 1,891 new properties would need to be provided in West Oxfordshire in the period 2011 - 2031 (95 per year). To achieve the current national average of 170 units per 1,000, a total of 2,588 new properties would need to be provided (129 per year). (Para 5.87)

These are ‘net’ figures that take no account of replacement provision of existing accommodation that is no longer fit for purpose. The ‘gross’ need is therefore expected to be higher.” (Para 5.88)

10.28 The local authority provides within the Local Plan a commitment to facilitating the increase in supply of specialised accommodation that it has identified as required through the Plan period:

“Whilst these figures are indicative only and should be treated with some caution, they clearly demonstrate that there will be an increasing need for specialist older persons housing in the District over the period of the Local Plan. The Council will therefore in line with Government practice guidance, count the provision of C2 uses (residential institutions) against the overall housing requirement and will seek to increase the supply of such housing by encouraging specific schemes in suitable, sustainable locations and seeking to ensure that older persons housing is provided including as part of the overall mix of development on larger developments.” (Para 5.89)

10.29 The commitment forms part of Policy H4:

“Particular support will be given to proposals for specialist housing for older people including but not restricted to, extra-care housing. Opportunities for extra care will be sought in the main and rural service centres and other locations with good access to services and facilities for older people.”

Section Summary

6.40 Oxfordshire has a long-standing and positive approach to addressing the needs of its ageing population through expansion and diversification of specialised accommodation. West Oxfordshire District has been a full partner in the development of those assessments and strategies.

6.42 As now clarified the Market Position Statement 2019-2022 makes a strong case for increasing the provision of Extra Care in the Social sector, arguments which support the complementary provision of Extra Care for older homeowners at a level proportionate to the tenure profile of the older population of South Oxfordshire.

11 Forecasting future need

11.1 The current pattern of provision in West Oxfordshire, as in the rest of the country, developed not in response to assessed need but rather in response to short-term demand and provider perceptions of what will be popular and fundable. Public policy has substantially shaped the pattern of provision in recent years.

11.2 Oxfordshire County Council has a well-established collaborative approach, working with City and district councils and health partners, to shape future provision of Extra Care in all tenures. Whilst the Market Position Statement of August 2019 seeks to extend the span of this planned approach to encompass Registered Care Home provision and social rented Extra Care it does not project the need for Market “for sale” Extra Care units nor does it connect to the need for specialised accommodation for older people offering support and lower levels of care.

11.3 Moving to a pattern with a more rational base that seeks to place all elements of provision within a wider context inevitably appears threatening to some. In seeking to look forward and to encourage a shift from the current pattern to one which offers a range of options to older people and is reflective of key characteristics of the older population it will be important to take into account a number of factors:

- Demand for older examples of rented conventional sheltered housing is likely to decline in West Oxfordshire as in other parts of the country
- The potential for leasehold retirement housing will continue to grow.
- Some existing schemes will lend themselves to refurbishment and remodelling to provide enhanced sheltered housing to support rising levels of frailty, and a number of those opportunities have already been taken locally.
- Extra Care housing should be provided for sale and rent.
- Provision of Registered Care both for Personal and Nursing Care will need to be distributed so that it is more nearly matched to need within local populations.
- The challenges of maintaining viability in smaller Registered Care Homes will continue to drive change in provision with an increase in larger, purpose-built developments.

The clear consequence is that there will be more of some styles of provision and less of others.

11.4 In the publication “Housing in Later Life”³³ we updated the guidance that we originally prepared for the publication “More Choice Greater Voice” for the Department for Communities and Local Government and the Care Services Partnership (CSIP) at the Department of Health. That model assumed that a “norm” for conventional sheltered housing to rent would be around 50 units per 1,000 of the population over 75 years of age and around 75 units per 1,000 of leasehold retirement housing. This deliberately inverted the current levels of provision in most places but in doing so sought to reflect the rapidly changing tenure balance.

11.5 The stock of rented sheltered housing is below national averages and some re-provision may be required to meet need and to facilitate the option to down-size for tenants in socially rented general needs housing.

11.6 Demand for leasehold retirement housing has continued to grow strongly and we therefore revised upward our targets for leasehold retirement housing, especially in areas where owner-occupation levels among older people are high and property values facilitate the move to such accommodation.

11.7 When we framed our targets in late 2007/ early 2008 Extra Care Housing was still little known, in many areas there were no developments at all and the initial targets reflected the difficulty of bringing forward developments on a model that was unfamiliar to many professionals and virtually unknown to the general public. The Department of Health and Homes and Communities Agency capital investment programme accelerated the rate of Extra Care Housing developments and the increasing number of commercially developed Retirement Villages and Continuing Care Retirement Communities, especially across the South of England have made the concept much better known.

11.8 The targets offered for Extra Care provision in the 2008 publication were very much a “toe in the water” at a time when it was still difficult to judge the acceptability of the model to older people or to those who advised them. That situation has now changed and we propose not only an increased target overall but a shift in the tenure balance to reflect the increasing recognition of the needs of older home owners for Extra Care style options.

11.9 The continuing drive among Adult Social Care authorities to shift from policies that rely heavily on Registered Care homes toward Extra Care Housing solutions also shifts the balance and supports an increase in targets either side of this divide.

11.10 When analysed in relation to the proportion of older people in the district who are owner-occupiers there is an under-supply of retirement housing offered on a leasehold basis. The district council has a role in encouraging the

³³ Housing in later life – planning ahead for specialist housing for older people, December 2012, National Housing Federation and the Housing Learning and Improvement Network.

identification of sites, in influencing the style of provision and through the Local Development planning process to facilitate an increase in this provision.

11.11 Extra Care Housing offers the possibility of housing a balanced community of people with relatively limited care needs through to those who might otherwise be living in residential care. Our modelling suggests provision of more than 500 units of Extra Care in total, divided between rented (about one third) and leasehold and shared ownership tenures (about two thirds) will be required in the short to medium term. The table suggests that in relation to affordable units the District is exceeding the target but is well behind the level of Market provision that we suggest is required to achieve a balance between tenures.

11.12 Table Fifteen summarises the current levels of provision and the adjustments that may be indicated to bring them to the levels that some would see as a benchmark for the future. How much specialised accommodation may be needed in total? Previous estimates of the requirements for sheltered housing tended to look mainly at the need for social rented provision, rather than at the overall potential demand.

11.13 The emergence of owner-occupation as a significant factor in old age has shifted the balance between estimates of need and response to demand. The benefits of providing more leasehold retirement housing, for example, may be seen in its effect in releasing family sized accommodation into the market, alongside its more significant impact in meeting the particular needs of those who move into it.

11.14 The “norms” reflect national patterns and priorities and will necessarily need to be moderated to take account of the rate of change that would be required to meet them. The pattern projected is for the medium to long-term and may need to be adjusted as newer forms are developed and mature. In particular the significant reduction in the most basic form of rented sheltered housing may not materialise if lack of suitable alternatives artificially sustains demand.

11.15 Judged against these norms there are marked deficits in provision in most categories. The limited supply of Age Exclusive and Sheltered Housing for rent is unusual and possibly reflects a deliberate policy decision by the local authority. In South Oxfordshire district, by comparison the provision of specialised accommodation for older people is more than double this level at 54.58 units per thousand of those 75 years of age or more. The most substantial deficits are in the provision of Retirement Housing and Extra Care available to those who are homeowners and wish to maintain their tenure of choice when moving to specialised accommodation.

Table Fifteen Indicative levels of provision of various forms of accommodation for older people in West Oxfordshire 2019

		Current provision	Current provision per 1,000 of Population 75+	Increase or decrease	Resulting number of units	Provision per 1,000 of Population 75+ (11,400)
Age Exclusive and Sheltered Housing for social rent		273	23.95	+411	684	60
Age Exclusive and Sheltered Housing for leasehold sale		476	41.75	+892	1,368	120
Enhanced sheltered Housing for social rent		0	0.0	+114	114	10
Enhanced sheltered Housing for leasehold sale		146	12.81	-32	114	10
Extra Care Housing	For social rent and shared ownership	204	17.89	-33	171	15
	for sale	59	5.17	+283	342	30

11.16 Table Sixteen projects forward to reflect the requirements of the older population of West Oxfordshire in 2035. The number of those 75 years of age or more will have greatly increased and without substantial provision in the intervening period the deficit in all categories of provision will have widened.

11.17 Whilst the Market Position Statement published by Oxfordshire Clinical Commissioning Group and Oxfordshire County Council, in collaboration with Oxford City and the four district councils, projects a need for additional Extra Care units to meet the “social need” for which they have commissioning responsibility it does not purport to project the current or future requirement for Market units.

11.18 As the Market Position Statement counts both Enhanced Sheltered and Extra Care units in its target of 25 units per thousand of the population 75+ this matches our prevalence rate for these two categories. It is reasonable to

extrapolate from this that to achieve a tenure balance in provision that reflects that within the wider population of older people in West Oxfordshire the rates of prevalence we have used in Tables Fifteen and Sixteen provide an appropriate tenure balance.

Table Sixteen **Indicative levels of provision of various forms of accommodation for older people in West Oxfordshire 2035**

	Current provision	Current provision per 1,000 of Population 75+	Increase or decrease	Resulting number of units	Provision per 1,000 of Population 75+ (17,700)	
Age Exclusive and Sheltered Housing for social rent	273	23.95	+789	1,062	60	
Age Exclusive and Sheltered Housing for leasehold sale	476	41.75	+1,648	2,124	120	
Enhanced sheltered Housing for social rent	0	0.0	+177	177	10	
Enhanced sheltered Housing for leasehold sale	146	12.81	+31	177	10	
Extracare sheltered housing	For social rent and shared ownership	204	17.89	+61	265	15
	for sale	59	5.17	+472	531	30

Section Summary

11.19 The stock of leasehold retirement housing whilst relatively strong by national standards comes nowhere meeting potential demand. There is enormous scope for development to meet the needs of older people who are homeowners.

11.20 To reflect the policy aspirations of the Oxfordshire Clinical Commissioning Group and Oxfordshire County Council to divert future increasing need away from Registered Care Homes and toward Extra Care the most pressing requirement is that their targets for provision in social rented and shared-ownership developments by Registered Providers should be matched by Extra Care provided to home owners for purchase.

11.21 The most pressing priority, driven by demography, need, tenure, and policy imperatives is to increase the availability of all categories of specialised accommodation for older homeowners. The development proposed by for Freeland would make a significant contribution to meeting that priority.

Annex One Explanation of terms used in this report

This report uses terms which are commonly understood among those working in the field of housing and care for older people but may not be so readily comprehensible by those working in other disciplines. Whilst not exhaustive this section seeks to explain the meaning and usage on this document, of some of those terms:

Sheltered housing is a form of housing intended for older people that first emerged in the 1950s and was developed in volume through the 1960s and 1970s. In this period it was developed in one of two styles: “Category Two” Sheltered Housing consisted of flats and/or bungalows with enclosed access, a communal lounge and some other limited communal facilities such as a shared laundry and a guest room. Support was provided by one or more “wardens” who were normally resident on site. “Category One” Sheltered Housing has many of the same features but might not have enclosed access, might have more limited communal facilities and would not normally have a resident warden. In current practice these models have merged and the service models for delivery of support are in flux. This provision has generally been made by Housing Associations and Local Authorities.

Retirement Housing is a term widely adopted to describe Sheltered Housing, similar in built form and service pattern to Category Two Sheltered Housing described above but offered for sale, generally on a long lease, typically ninety-nine or one hundred and twenty-five years. This provision has generally been made both by Housing Associations (often through specialist subsidiaries) and commercial organisations.

Very sheltered housing is a term now largely disappearing from use that was used first in the mid to late 1980s to describe sheltered schemes that sought to offer some access to care services and some additional social and care facilities.

Enhanced sheltered housing is the term that has largely succeeded to Very Sheltered Housing to describe sheltered housing that provides more in facilities and services than traditional sheltered housing but does not offer the full range of facilities, services and activities to be found in an Extra Care Housing Scheme.

Extra Care Housing is the term used for a complex of specialised housing for older people that provides a range of “lifestyle” facilities for social, cultural, educational and recreational activities, in addition to services that provide care in a style that can respond flexibly to increasing need whilst helping the individual to retain their place within their existing community. In most Extra Care Housing schemes people enter their unit of accommodation and the care services they receive are delivered into that unit as their needs increase. This is generally referred to as the “integrated model” of Extra Care.

Continuing Care Retirement Community is a variant of the Extra Care Housing model but one in which higher levels of care are generally delivered by transfer within the scheme from an independent living unit in which low to moderate care is delivered into a specialist unit or care home. This pattern is often referred to as the “campus” model of Extra Care.

Registered Care Home is the form of institutional provision that in the past would have been referred to as either a “Residential Care Home” or a “Nursing Home”. All are now referred to as “Registered Care Homes” and differentiated as either “Registered Care Home providing personal care” or as a “Registered Care Home providing nursing care”.

Annex Two: Specialist Accommodation for Older People in West Oxfordshire

Affordable Age Exclusive housing

Name of scheme	Address	Manager	Number of units
Caroline Court	off Rectory Lane, Woodstock, Oxfordshire, OX20 1UT	Cottsway	23
Edington House	Edington Square, Witney, Oxfordshire, OX28 5YP	Cottsway	11
Evenlode Close	Nine Acres Lane, Charlbury, Oxfordshire, OX7 3RE	Cottsway	12
Queen Emma's Dyke	Corn Street, Witney, Oxfordshire, OX28 4DS	Cottsway	27
Ryegrass	Flemings Road, Woodstock, Oxfordshire, OX20 1NB	Cottsway	19
Shakenoak	Windmill Road, North Leigh, Oxfordshire, OX29 6SP	Cottsway	12
St Mary's Court	The Crofts, Witney, Oxfordshire, OX28 4AP	Cottsway	26
Sunnyside	Spareacre Lane / Mill Street, Eynsham, Oxfordshire, OX1 1JY	Cottsway	16
Warwick Almshouses & others	126 High Street, Burford, Oxfordshire, OX18 4QR	Burford Almshouse Charity	18 ³⁴
Witney Almshouses	Newland/Station Lane/Church Green, Witney, Oxfordshire, OX28 3TY	Witney Town Charities	18
Total			182

³⁴ Licence, not tenancy

Affordable Sheltered housing

Name of scheme	Address	Manager	Number of units
Bakers Court	Millwood End, Long Hanborough, Oxfordshire, OX29 8BB	Green Square	11
Hanover Close	Sandford Rise, Charlbury, Chipping Norton, Oxfordshire, OX7 3TA	Anchor Hanover	26
Hunts Close	Burford, Oxfordshire, OX18 4HU	Green Square	22
Kingsgate	Cote Road, Aston, Bampton, Oxfordshire, OX18 2BP	Catalyst Housing Ltd	21
The Old Bakehouse	West End, Chadlington, Chipping Norton, Oxfordshire, OX7 3NJ	Abbeyfield	11
Total			93

Enhanced Sheltered housing to rent

Name of scheme	Address	Manager	Number of units
Total			0

Extra Care to rent

Name of scheme	Address	Manager	Number of units
The Paddocks	Shipton Road, Milton-under-Wychwood, Chipping Norton, Oxfordshire, OX7 6GF	Green Square	44
Willow Gardens	Russell Way, Rockhill, Chipping Norton, Oxfordshire, OX7 5FX	Housing 21	80 ³⁵
Fernleigh	Buttercross Lane, Witney, Oxfordshire, OX28 4DZ	Order of St John Care Trust	80
Total			204

³⁵ Due for completion 2022

Age exclusive housing for sale

Name of scheme	Address	Manager	Number of units
Mill Street Mews	Mill Street, Eynsham, Oxon, OX29 4XA	Grange Property Management	9
Penhurst Gardens and Buchanan Court	Chipping Norton, Oxfordshire, OX7 5ED	ELM Group	44
Pentlow Gardens	London Road, Chipping Norton, Oxfordshire, OX7 5AH	McCarthy & Stone	14
Tannery Gardens	Station Road, Bampton, Oxfordshire, OX18 2AW	Blue Cedar Homes	9
Windrush Court	High Street, Burford, Oxon, OX18 4RE	Burford Hill Residents	20
Total			96

Sheltered housing for sale

Name of scheme	Address	Manager	Number of units
Gloucester Court Mews	High Street, Witney, Oxon, OX28 6LA	Grange Property Management	19
Harman Court	High Street, Milton-under-Wychwood, Chipping Norton, Oxfordshire, OX7 6LA	Grange Property Management	20
Kingstone Court	Wards Road, Chipping Norton, Oxfordshire, OX7 5BP	First Port	33
Millview	West Street, Chipping Norton, Oxfordshire, OX7 5EU	Midland Heart	25
Norton Green Court	The Green, Chipping Norton, Oxon, OX7 5DB	First Port	31
Old Rectory Mews	The Crofts, Witney, Oxfordshire, OX28 4AG	Grange Property Management	6

Otter's Court	Priory Mill Lane, Witney, Oxfordshire, OX28 1GJ	First Port	71
Riverside Gardens	Mill Street, Witney, Oxon, OX28 6DD	Grange Property Management	46
Shepard Way	Albion Street, Chipping Norton, Oxfordshire, OX7 5BE	Stonewater	38
St Mary's Mead	The Mill House, Witan Way, Witney, Oxon, OX28 4EZ	First Port	66
Swinbrook Court	Langdale Gate, Witney, Oxon, OX28 6FN	First Port	28
The Playing Close	Pooles Lane, Charlbury, Oxfordshire, OX7 3QP	Cognatum Estates	16
Upper Brook Hill	Woodstock, Woodstock, Oxon, OX20 1UA	Cognatum Estates	27
Windrush Court	67 St Marys Mead, Witney, Oxon, OX28 4FD	First Port	54
Total			380

Enhanced Sheltered housing for sale

Name of scheme	Address	Manager	Number of units
Prebendal Court	Station Road, Shipton-under- Wychwood, Chipping Norton, Oxfordshire, OX7 6BQ	Mariposa Care	20
Richmond Witney	Curbridge Road, Witney, Oxfordshire, OX29 7NR	Richmond Villages	126
Total			146

Extra Care of which some is for sale leasehold or shared ownership

Name of scheme	Address	Manager	Number of units
59	Trinity Road, Chipping Norton, Oxfordshire, OX7 5AJ	McCarthy & Stone	59
Total			

Registered care homes providing personal care

Name of scheme	Address	Owner	Number of beds
Beech Haven	77 Burford Road, Chipping Norton, Oxfordshire OX7 5EE	Mary Whitehead	29
Enstone House	Cox's lane, Enstone, Chipping Norton, Oxfordshire OX7 4LF	Mrs J Wastie	33
Madley Park House	Madley Park, Witney, Oxon OX28 1AT	Order of St John Care Ltd	60
Millers Grange Care Home	Curbridge Road, Witney, Oxon	Care UK	52
Newland House	50 Oxford Road, Witney, Oxfordshire OX28 3JG	Hartford Care	30
Rosebank Care Home	High Street, Bampton, Oxfordshire OX18 2JR	Rosebank Nursing Homes Ltd	28
Spencer Court	Union Street, Woodstock, Oxfordshire OX20 1JG	Order of St John Care Ltd	46
Total			278

Registered care homes providing nursing care

Name of scheme	Address	Owner	Number of beds
Beechcourt Nursing Home	37 Newlands Street, Eynsham, Oxford OX29 4LB	Dr B Cheung	26
Burford Nursing Home	White Hill, Burford, Oxfordshire OX18 4EX.	Grace Care Services	36
Cedar Court Care Home	60 Moorland Road, Witney, Oxfordshire OX28 6LG	Healthcare Homes Group Ltd	63
Churchfields	Pound Lane, Cassington, Witney, Oxfordshire OX29 4BN	Churchfields Care Home Ltd	35
Freeland House	Wroslyn Road, Freeland, Witney, Oxfordshire OX29 8AH	Minster Care Group	76
Henry Cornish Care Centre	Rockhill Farm Court, Chipping Norton, Oxfordshire OX7 5AU	Order of St John Care Trust	50
Meadowview Nursing Home	48 Rack End, Standlake, Witney, Oxfordshire OX29 7SB	Mr F Pardham	42
Merryfield House Nursing Home	33 New Yatt Road, Witney, Oxfordshire OX28 1NX	Peveril Court Care	19
Middletown Grange Care Home	33 New Yatt Road, Witney, Oxfordshire OX28 1NX	Barchester Care	56
Mill House Care Home	30-32 Bridge Street, Witney, Oxfordshire OX28 1HY	Brighterkind	34
Penhurst Garden Care Home	New Street, Chipping Norton, Oxfordshire OX7 5LN	Porthaven Care Homes	58
Richmond Witney Care Home	Coral Springs Way, Richmond Village, Witney, Oxfordshire OX28 5DG	Richmond Villages	60

Southerndown Care Home	Worcester Road, Chipping Norton, Oxfordshire OX7 5YF	Barchester Healthcare Ltd	87
Tall Trees	Burford Road, Shipton-Under- Wychwood, Chipping Norton, Oxon OX7 6DB	Caring Home Group	60
The Cotswold Home	Woodside Drive, Bradwell Grove, Burford, Oxfordshire OX18 4XA	Elizabeth Finn Homes	51
The Homestead	24 Flax Crescent, Shilton Park, Carterton, Oxfordshire OX18 1NA	Methodist Homes	68
The Langston Nursing Home	Station Road, Kingham, Chipping Norton, Oxfordshire OX7 6UP	Langston (Kingham) Ltd	36
The Old Prebendal House	Station Road, Shipton-under- Wychwood, Chipping Norton, Oxfordshire OX7 6BQ	Mariposa Care Ltd	39
Total			896

Annex Three POPPI data sources

As indicated in Section Four projections of numbers of older people likely to be experiencing various functional or health issues that are indicative of need for specialised accommodation and care are taken from the POPPI (Projecting Older People Population Information System) database. This database is maintained by the Institute of Public Care at Oxford Brookes University and is a widely respected and authoritative source, used by statutory, commercial and third sector organisations. We set out here the sources and methodology notes provided by POPPI in relation to the tables contained in Section Four of this report.

Table 5 Domestic tasks: People aged 65 and over unable to manage at least one domestic task on their own, by age and gender, projected to 2035

Instrumental Activities of Daily Living (IADLs) are activities which, while not fundamental to functioning, are important aspects of living independently:

- Doing routine housework or laundry
- Shopping for food
- Getting out of the house
- Doing paperwork or paying bills

Figures are taken from the Health Survey for England 2016: Social care for older adults (2017) NHS Digital³⁶, Table 4: Summary of Activities of Daily Living (ADLs/IADLs) for which help was needed and received in the last month, 2011-2016, by age and sex.

The prevalence rates have been applied to ONS population projections of the 65 and over population to give estimated numbers predicted to need help with at least one of the domestic tasks listed, to 2035.

Table 6 Self-care: People aged 65 and over unable to manage at least one self-care activity on their own, by age and gender, projected to 2035.

Activities of Daily Living (ADLs) are activities relating to personal care and mobility about the home that are basic to daily living:

³⁶ The Health Survey for England 2016 is the latest in a series of surveys commissioned by NHS Digital and carried out by NatCen Social Research and University College London. The surveys are representative of adults and children in England, and are used to monitor the nation's health and health-related behaviours.

- Having a bath or shower
- Using the toilet
- Getting up and down stairs
- Getting around indoors
- Dressing or undressing
- Getting in and out of bed
- Washing face and hands
- Eating, including cutting up food
- Taking medicine

Figures are taken from the Health Survey for England 2016: Social care for older adults (2017) NHS Digital, Table 4: Summary of Activities of Daily Living (ADLs/IADLs) for which help was needed and received in the last month, 2011-2016, by age and sex.

The prevalence rates have been applied to ONS population projections of the 65 and over population to give estimated numbers predicted to need help with at least one of the self-care tasks listed, to 2035.

Table 7 Limiting long term illness: People aged 65 and over with a limiting long-term illness, by age, projected to 2040.

Figures are taken from Office for National Statistics (ONS) 2011 Census, Long term health problem or disability by health by sex by age, reference DC3302EW. Numbers have been calculated by applying percentages of people with a limiting long-term illness in 2011 to projected population figures.

Table 8 Mobility: People aged 65 and over unable to manage at least one mobility activity on their own, by age and gender, projected to 2040.

Activities include: going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed

Figures are taken from Living in Britain Survey (2001), table 29.

The prevalence rates have been applied to ONS population projections of the 65 and over population to give estimated numbers predicted to be unable to manage at least one of the mobility tasks listed, to 2035.

Table 9 Dementia: People aged 65 and over predicted to have dementia, by age and gender, projected to 2040

Figures are taken from Dementia UK: Update (2014) prepared by King's College London and the London School of Economics for the Alzheimer's Society. This report updates the Dementia UK (2007) report. It provides a synthesis of best available evidence for the current cost and prevalence of dementia. It aims to

provide an accurate understanding of dementia prevalence and cost in the UK to assist in policy development, influencing, commissioning and service design.

The prevalence rates have been applied to ONS population projections of the 65 and over population to give estimated numbers of people predicted to have dementia to 2035.

To calculate the prevalence rates for the 90+ population, rates from the research for the 90-94 and 95+ age groups have been applied to the England population 2013 (when the research was undertaken) to calculate the numbers in each age group, the sum of these groups is then expressed as a percentage of the total 90+ population to establish the predicted prevalence of the 90+ population as a whole.

Annex Four The authors of this report

Nigel J W Appleton MA (Cantab)

Nigel Appleton is Executive Chairman of Contact Consulting (Oxford) Ltd, a consultancy and research practice specialising in issues of health, housing and social care as they affect older people and people with particular needs. Nigel's particular area of interest and expertise is in relation to the accommodation and care needs of older people.

Nigel Appleton has a nationally established reputation in the field of estimating the requirement for particular styles of accommodation for older people, having been the author of publications supported by the Department of Communities and Local Government and the Department of Health that provide guidance in this area.³⁷

In recent years he has developed a substantial practice in the demonstration of need for older people's accommodation and the documentation of that need to form part of a planning case. His work has also been tested at Appeal where he has contributed to the applicant's case as an Expert Witness.

He contributed the section "Preparing the Evidence Base" to "Housing in later life – planning ahead for specialist housing for older people" (National Housing federation and the Housing LIN, December 2012). This updated the comparable sections of his: "More Choice: Greater Voice – a toolkit for producing a strategy for accommodation with care for older people" (February 2008 for Communities and Local Government and the Care Services Improvement Partnership). He is also the author of "Connecting Housing to the Health and Social Care Agenda – a person centred approach" (September 2007 for CSIP).

Nigel also wrote "Planning for the Needs of the Majority – the needs and aspirations of older people in general housing" and "Ready Steady, but not quite go – older homeowners and equity release", both for the Joseph Rowntree Foundation.

For the Change Agent Team at the Department of Health he wrote "An introduction to Extracare housing for commissioners" and "Achieving Success in Developing Extra Care housing" together with a number of briefing papers and studies in the area of sheltered housing and its variants.

³⁷ "More Choice, Greater Voice, a toolkit for producing a strategy for accommodation with care for older people", Nigel Appleton, CLG & CSIP, 2008 & "Housing in later life – planning ahead for specialist housing for older people", December 2012, National Housing Federation and the Housing Learning and Improvement Network.

Other publications include three Board Assurance Prompts on the deployment of Assistive Technology/ telecare in both specialised and general housing for older people; “Housing and housing support in mental health and learning disabilities – its role in QIPP”, National Mental Health Development Unit, with Steve Appleton (2011) and “The impact of Choice Based Lettings on the access of vulnerable adults to social housing” (2009) for the Housing LIN at the Department of Health.

Nigel led the team that prepared the material for the Good Practice Guidance for local authorities on delivering adaptations to housing for people with disabilities issued by the Office of the Deputy Prime Minister, Department of Health & Department for Education and Skills.

His expertise covers the full spectrum of issues in the field of housing and social care for older people. He has supported more than thirty local authorities in preparing their strategies for accommodation and care in response to the needs of an ageing population. With his team he has conducted a number of detailed reviews of existing sheltered housing schemes for both local authority and not for profit providers.

Nigel also brings expertise in relation to the various models of accommodation for older people and the operational issues that may arise in relation to staffing numbers and profile, operational viability and related matters.³⁸

He has worked with housing and adult social care officers and members in a wider range of local authorities, and with various commissioning and provider bodies within the NHS. Nigel works to support development, operation and evaluation of specialised accommodation for providers in statutory, commercial and third sectors.

Nigel served as Expert Advisor to the Social Justice and Regeneration Committee of the Welsh Assembly in its review of housing and care policies in relation to older people in Wales.

Prior to establishing his consultancy in 1995 Nigel was Director of Anchor Housing Trust. Until December 2017 he served as a Governor and Chair of the Management Committee of Westminster College, Cambridge. Nigel formerly served as Vice Chair of the Centre for Policy on Ageing and as a trustee of Help & Care, Bournemouth, and has been an honorary research fellow at the Centre for Urban and Regional Studies, Birmingham University. In the more distant past he was a member of the Governing Body of Age Concern England and a Board Member of Fold Housing Group, Northern Ireland.

³⁸ For example, for the Joseph Rowntree Foundation: “Planning for the Needs of the Majority – the needs and aspirations of older people in general housing”, and for the Change Agent Team at the Department of Health: “An introduction to Extracare housing for commissioners” and “Achieving Success in Developing Extra Care housing”

David Appleton

David Appleton is the Consultancy Support and Development Manager for Contact Consulting (Oxford) Limited. David joined the staff of Contact Consulting in 2014 after a two-year period in which he had undertaken specific assignments on a sub-contracted basis.

After securing his HND in Health, Welfare and Social Policy from Anglia Ruskin University David worked in residential care settings, initially with Cambridgeshire County Council, and subsequently with Northamptonshire County Council. During his time in Northamptonshire David was responsible for the oversight and delivery of their Physical Intervention training, and investigation. At the time of leaving Northamptonshire CC, in December 2011, David's role was that of Assistant Manager in one of the Authority's residential units.

Since joining Contact Consulting David has undertaken a variety projects and his current responsibilities within the company include research, policy and data analysis, policy and report writing. He is also involved in delivering training, in service evaluation, and supporting investigations in a number of statutory and non-statutory settings.

In addition to his HND in Health, Welfare and Social Policy David continued his professional development, undertaking NVQ3 in Children and Young People, NVQ4 in Leadership and Management, and accreditation as an instructor in Physical Intervention. Since joining Contact Consulting he has secured accreditation in Prince2 project management, and provides that input to company assignments as required.

From: Kent Rosalind [REDACTED]
Sent: 23 October 2020 15:51
To: Planning Policy (WODC)
Subject: AAP Response for 23.10.20

Dear Ms Desmond and team,

Would you be kind enough to submit my response to the Planning Committee please?

Many thanks and warm wishes,

Rosalind Kent [REDACTED] tel: [REDACTED]

RESPONSE TO THE 'WODC GARDEN VILLAGE AREA ACTION PLAN CONSULTATION' from
Rosalind Kent 23.10.30

My thanks to the Planning Policy Committee for inviting comments on the draft Garden Village (GV) Area Action Plan.

First of all may I congratulate the District Council Planners on such an imaginative, far-sighted and responsible draft AAP. Your thread is indeed golden! May I suggest that as far as possible all plans are mandatory and that planning permission is not given to developers who try to opt out of this legal responsibility. 28/01

Is it too late to point out that GVs should not be adjacent to main trunk roads?

Second, I thoroughly endorse the excellent and comprehensive response from EPIC&GreenTEA which, incorporated into the final statutory AAP, should indeed produce the desired exemplar village!

I have restricted my remarks to the areas with which I am most familiar, using numbering as in the Schedule of Policies in the AAP pre-submission draft.

Theme 1. Climate Action

Policy 1 - Climate resilience and adaptation:

Plan and design everything with primary reference to the Climate Emergency.

28/02

Preserve all existing trees, also hedges wherever possible.
Resilient building design for housing and all other buildings - see Policy 22.

Policy 2 - Net-zero carbon development

2050 is **too late for net zero!** The deadline should be at least 2035 nationally, and, for the GV, **from the start!**

Development must cover by mandate: 28/03

- 1. Low carbon construction of buildings to the highest specification, and
- 2. Maintenance, including renewable energy generation to supply the entire GV for all needs.
- 3. Form an **Energy Company with a local grid** which would also provide employment!
Energy - ALL renewably generated on-site! Any excess could supply Eynsham.
NO fossil fuels for maintenance, including heating, cooking, lighting etc.

Policy 3 - Towards 'zero-waste' through the circular economy 28/04

Yes! With underground storage as in North Eddington, Cambs.

Theme 2. Healthy Place Shaping

Policy 4 - Adopting healthy place shaping principles 28/05

See Policy 14; Cycle/walking network.

Policy 5 - Social Integration, Interaction and Inclusion 28/06

Community Centre essential!
Social orientation of houses - no suburban-type rows of houses.
Village committee of residents to direct activities and essential development no further housing ever!
Yes, Community Development Officer is a good idea.

Policy 6 - Providing opportunities for healthy active play, leisure and lifestyles 28/07

Childrens' play areas with safe wooden structures in green setting, within view of family house windows.

Policy 7 - Green Infrastructure 28/08

I agree with your AAP recommendations including " 'Building with Nature' excellent award to be achieved."

Policy 8 - Enabling healthy local food choices 28/09

Provide allotments/community farm/orchards; open market for local produce; give preference to 'local goods' shops.
Minimum food miles.

Theme 3. Protecting and Enhancing Environmental assets

Policy 9 - Biodiversity (Net Gain) 28/10

You cannot **gain** biodiversity by putting concrete blocks all over prime farmland!
Reserve areas for e.g. ground-breeding birds; rare plants; ponds/river for indigenous flora and fauna.

Policy 10 - Water environment

Recycling of water essential e.g. bathroom wastewater to flush toilets; large scale collection of rainwater for gardens. Yes, sustainable drainage!	28/11
<i>Policy 11 - Environmental assets</i> Appropriate conservation of natural and scenic features. Avoid building on the hill, it will spoil the view of the village from outside and will ‘overlook’ houses downhill, also it could be a prime recreational walking area.	28/12
<i>Policy 12 - Conserving and enhancing the historic environment of Salt Cross</i> Yes! Tilgarsley and Roman Remains particularly. Statutory enhancement of natural, built and historic environment. I agree with the AAP aims and the need for a Conservation Management Plan.	28/13
 Theme 4. Movement and Connectivity	
<i>Policy 13 - Movement and Connectivity Key Design Principles</i> Maximum provision for car-free movement. Housing areas must have minimum intrusion by cars. Car parks should be hidden in ground floor or basements of larger buildings eg flats. EV charging points in car parks and for homes with a parking space.	28/14
<i>Policy 14 - Active and Healthy Travel</i> Provision of an <u>exemplary cycle/walking network</u> , as in the ‘Aura’ S.Cambs. development; connecting with housing areas and (covered) public transport stops. A 20mph speed limit overall. <u>Cycle connection with toll bridge</u> . Preserve public rights of way.	28/15
<i>Policy 15 - Public Transport</i> Ample provision for public transport <u>must</u> be made.	28/16
<i>Policy 16 - Reducing the Overall Need to Travel including by Car</i> Key facilities needed on site eg Community Hall, Provisions shops/local-produce market, Medical Practice, School/s.	28/17
<i>Policy 17 - Road Connectivity and Access</i> A40 crossings - another tunnel needed at eastern end. Road crossings will exacerbate commuter queues. Design to discourage through-traffic.	28/18
 Theme 5. Enterprise, innovation and productivity	
<i>Policy 18 - Salt Cross Science and Technology Park</i>	
<i>Policy 19 - Small-scale commercial opportunities and flexible business space</i>	
<i>Policy 20 - Homeworking</i> Provide some houses with ground floor extensions for trades eg photography studio.	28/19

Policy 21 - Employment, skills and training
Provision for apprenticeships with local trades. Use local labour. 28/20

Theme 6. Meeting Current and Future Housing Needs

Policy 22 - Housing Delivery
Must be to the highest standards of design, insulation and renewable energy generation, e.g. Code for Sustainable Homes level 6. Infrastructure to be completed first. 28/21
Also orientated mainly to the South and built fairly densely, maximum 3 storeys, so as to conserve the site to **statutory green status** with a central park as a focus - which could be the hill to the north. PV tiles if possible. Maximum use of local sustainable materials for building work.

Policy 23 - Housing Mix 28/22
At least 50% affordable, with a proportion of Social Housing.

Policy 24 - Build to Rent 28/23
No! Housing needs to be available and affordable for local workers. Social housing must fulfil this need.

Policy 25 - Custom and Self-Build Housing 28/24
Maybe about 30-40, scattered throughout the development, not an elite group.
All need to be to high sustainability standards.

Policy 26 - Meeting Specialist Housing Needs 28/25
Mandatory - sheltered flats for senior citizens near village centre. Preferably also a Care/Nursing Home.
Supervised housing for socially challenged young people.

Theme 7. Building a Strong, Vibrant and Sustainable Community

Policy 27 - Key development principles 28/26
Compact facilities - nothing more than 10min walk away.
I agree with the AAP principles.

Policy 28 - Land uses and layout – the spatial framework 28/27
Needs ample provision for sport, allotments and orchards/farm.
Green corridors for free movement of wildlife. Including wide hedges with nut bushes eg Hazelnut. Elsewhere; Walnut and Sweet Chestnut trees as larger, 'statement' trees (also a food resource).
'Vistas' to be designed into plan, e.g.view of Church Hanborough steeple, at end of cycle/walking paths.

Policy 29 - Design requirements 28/28
A good mixture of well designed buildings, including a proportion of traditional Cotswold stone.

Policy 30 - Provision of supporting infrastructure

Policy 31 - Long-term maintenance and stewardship
Proportion of land sale to residents for communal needs. "A Garden Village must capture the value of

the land for the benefit of the community” (Garden City Principles). Ideally the community should own the whole site! 28/29

A Residents’ Committee for major village decisions and direction.

An independent assessment group must monitor the site long term to ensure the endurance of standards.

Representation received by: KtM

Dated: 17 October 2020

AAP Section: Green Infrastructure

"I believe a cycle path down the entire length of lower road would aid car congestion in the area significantly. Residents of Salt Cross could cycle safely to the railway station at Hanborough. School children from both Hanborough villages could cycle to secondary school in Witney. Those adults working in Oxford could cycle from Hanborough safely and again traffic around Salt Cross could be reduced." - 17 Oct 2020 19:59 (Green Infrastructure)

29/01



CREATING ENERGY WE CAN ALL FEEL GOOD ABOUT

lowcarbonhub.org

FAO: Planning Policy
West Oxfordshire District Council
New Yatt Road
Witney OX28 1PB

21st October 2020

Dear Planning Policy Team

Salt Cross Garden Village Area Action Plan Consultation pre-submission draft

We at the Low Carbon Hub are working with Eynsham Green TEA (Transition Eynsham Area) and WODC to both deepen the work on energy at Salt Cross and widen it out to become a long-term action plan to achieve a zero carbon energy system in the Eynsham primary substation area.

30/01

The Low Carbon Hub (LCH) ⁱ is a social enterprise based in Oxford. Our mission is to prove we can meet our energy needs in a way that's good for people and the planet, so we have taken great interest in the current proposal to build a Garden Village north of Eynsham for three reasons:

1. We have been working with Eynsham Green TEA since we started the Low Carbon Hub in 2011. Eynsham hosted our first community solar pv project, a pilot for our Oxfordshire 'People's Power Station' ⁱⁱ
2. The goal of creating a zero carbon, energy positive settlement which follows the community-based principles of Garden Communities is aligned with our core vision.
3. The proposed development presents a unique opportunity for the Local Energy Oxfordshire (LEO) project, of which we are part, to model a smart energy system which can act as an exemplar to be replicated across the county, or even the country, helping the UK to achieve its legally binding goal of net zero carbon by 2050. ⁱⁱⁱ Our aim is to accelerate the route to net zero.

In our role as a partner in Project LEO, we have already participated in the preparation of the Energy Plan for the garden village ^{iv}, which has played a part in informing the pre-submission Area Action Plan (AAP). As the next step, we are project managing Eynsham's Smart and Fair Futures project ^v, which seeks to ensure that the transition to zero carbon not only takes advantage of key new technologies such as a local Smart Grid, but also has at its core the equitable inclusion of all members of society.

30/01
cont.

We are very encouraged to see the seriousness with which Climate Change is being approached in the AAP, forming "*a golden thread running through the whole AAP in areas such as sustainable construction and renewable energy....*" In our response we address only those areas of particular interest to LCH; policies 2 (Net-Zero Carbon Development) and 31 (Long-term Maintenance and Stewardship). We view these policies as sound, achievable and backed up by ample evidence.



Policy 2: Net-Zero Carbon Development This policy is consistent with national and local policy and sits well among the groundswell of pathways and scenarios being explored in recent Government initiatives. For instance Local Area Energy Plans will be required under RIIO-2 and our Eynsham Energy Action Plan will inform their development. The Smart and Fair Futures project has the added advantage of being community led, which will facilitate the behavioural change and demand management which the National Grid's Future Energy Scenarios acknowledge as a key component of achieving net zero.^{vi}

30/02

We endorse the choices on construction and renewable energy which were supported by the Elementa net zero report^{vii}. Specifically, we agree that achieving net zero carbon means using Passivhaus or the equivalent building methods to keep heating demand in buildings below 15kWh/m²/yr, lower embodied energy, ruling out gas use and the requirement for 100% renewable energy. The smart energy systems (including uses for the Smart Energy Hub) and business models which Project LEO is developing within our Smart and Fair Futures Energy Action Plan can help make this happen. We consider that any viability issues should be addressed at an early stage and not be left to the reserved matters stage, which could put the high standards set out in the AAP at risk, resulting in both the requirement for costly and disruptive retrofits at a later date and ongoing damaging emissions. We conclude that the zero carbon aims of the AAP are sound, well supported locally and achievable.

Policy 31: Long-term maintenance and stewardship

Our Smart and Fair Futures project will also be looking at the crucial issue of long term stewardship. We were encouraged by the evidence on Community Land Trusts (CLT) in the AAP, as a CLT could include a community energy services company, helping to bring fair access for households and businesses. Our interest in this concept derives from our core belief that communities should benefit from and be empowered by involvement in the operation of local renewable energy projects.

30/03

We trust you find our response constructive in furthering the core aims of the AAP.

With best wishes



Dr Barbara Hammond MBE, CEO Low Carbon Hub



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ⁱ <https://www.lowcarbonhub.org/>

ⁱⁱ <https://peoplespowerstation.org/> <https://www.lowcarbonhub.org/projects/our-projects/>

ⁱⁱⁱ <https://project-leo.co.uk/> 'one of the most ambitious, wide-ranging, innovative, and holistic smart grid trials ever conducted in the UK' funded by Innovate UK and the Eynsham area is now a Project LEO Smart and Fair Neighbourhood project.

^{iv} [Oxfordshire Cotswolds Garden Village Energy Plan - West ...](#)

^v [Local Energy Accelerating Net Zero - Project LEO](#)

<https://www.lowcarbonhub.org/p/a-smart-and-fair-future-for-eynsham-low-carbon-hub-grants-programme/>

This led into the larger project

^{vi} <https://www.nationalgrideso.com/future-energy/future-energy-scenarios/fes-2020-documents> Energy Systems Catapult

^{vii} [Trajectory For Net Zero Buildings For The Oxfordshire Garden Village - pdf - 2.60 Mb](#)