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# Eynsham Neighbourhood Plan

## Representations\_Reg 16\_Grosvenor

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1. Grosvenor represents a consortium of landowners that controls the majority of the Strategic Location for Growth (SLG) to the north of Eynsham. Grosvenor is committed to working collaboratively with West Oxfordshire District Council (WODC) and other stakeholders, including the local community, to ensure that Oxfordshire Cotswolds Garden Village (OCGV) is promoted and delivered consistently with planning policy aims and objectives. Grosvenor has already begun working with the Eynsham Futures Steering Group (EFSG) and Eynsham Parish Council (EPC), alongside other stakeholders, and will continue to engage with them throughout the development of the Neighbourhood Plan, the Area Action (AAP) and the preparation of the planning application for OCGV.
2. Grosvenor broadly supports the Eynsham Neighbourhood Plan (ENP) and the community aspirations contained within it. Grosvenor has fully participated in all engagement opportunities extended by EFSG and EPC to date and appreciates the changes which have been made between version 3.09 (Reg 14) and version 3.12 (Reg 16) of the ENP in line with Grosvenor's previously submitted representations.
3. A key change outlined in the Consultation report prepared by the EFSG is the addition of the AAP area in Map 1, clearly marking the specific area within the parish which will be covered by the forthcoming AAP. This welcome change clearly recognises the distinct area within the Neighbourhood Plan area which will be covered by the forthcoming AAP. The preparation of the AAP has already involved the steering group, parish and local community in its preparation, with consultation on the 'Issues Paper' running from 22<sup>nd</sup> June to 3<sup>rd</sup> August 2018. Beyond this, WODC have established a new Community Forum specifically to obtain local views and aspirations for the OCGV site, with future opportunities to respond to the 'Preferred Options Paper' ahead of adoption. The AAP is currently envisaged to commence the next stage of consultation in June of this year, with the examination anticipated in December 2019.
4. Grosvenor also appreciates the additional references to the Eynsham Infrastructure Delivery Plan (IDP), notably in the introduction to the Neighbourhood Plan. This IDP, currently in preparation by WODC, will be the forum where the delivery of the Garden Village and West Eynsham Strategic Development Area will be coordinated. It must also be noted that the IDP for Eynsham area will become part of the necessary evidence base for the AAP to inform site specific policy for the OCGV and subsequent, site specific, S106 agreements and planning conditions; the mechanisms which determine financial contributions and the phasing of the development.
5. Throughout the plan there are clear examples where specific comments made during our previous representations have been taken into account, particularly removing elements of overlap between the Neighbourhood Plan and the since adopted Local Plan. This is particularly helpful in the revision of ENP1 (Housing) which was previously not in conformity within Policy H4 (Type and mix of new homes) of the Local Plan although it should be noted that the Garden Village issues paper consulted on housing mix and the AAP will establish the most appropriate mix, type and tenure of housing for the OCGV.

However, there are elements of duplication between the Local Plan and the Neighbourhood Plan which remain, through specific reference to Local Plan policies in ENP7 (Sustainable Transport), ENP9 (Parking) and ENP10 (Building a strong sustainable economy) but also through overlap, such as ENP3 (Community Facilities) and ENP14 (Sustainable Growth).

6. Grosvenor also remain concerned that a number of the issues raised in previous consultations have not been adequately addressed, with changes often limited to slight modification to include the terms “should” (ENP1), “ideally”(Paragraph 3.5) and “recommended” (Note 1- Walking distances) where additional requirements are intimated beyond the Local Plan. Whilst Grosvenor recognise the ambitions of the EFSG and the softening of language to include phrases such as “as can reasonably be achieved” or “as close as practical”, this is potentially confusing for decision makers who will consider the Neighbourhood Plan in the determination of the ultimate outline planning application (OPA) for the Garden Village. Planning Policy Guidance clearly indicates that a policy should be clear and unambiguous to enable a decision maker to apply it consistently and with confidence when determining planning applications.
7. In contrast to the above point, there is a particular example of overly restrictive policy, as stated in our previous representations. This relates to references within policy text to Notes A, B and Table 1 which contain the following: “Recommended effect that distance of homes from village facilities will have on decision to permit development”. Grosvenor supports the promotion of walkable networks for the new and existing community as part of its commitment to promote sustainable travel choices. However, it remains that the distances used within Notes A, B and Table 1 are too prescriptive at this stage because land use distribution is yet to be determined which will influence the nature of the local centre(s) and facilities within, and there could be sound placemaking principles which require an alternative approach.
8. Following this point on walking distances being raised in our previous representations, supporting text has been added in Note C to state that “targets such as the distances of Table 1 should not be seen as absolute requirements but as a clear way of establishing what is wholly acceptable, what is considered less than ideal but potentially justifiable on a case-by-case basis and what requires exceptional justification due to the perceived harm that might otherwise be caused”. This is seemingly inconsistent with Paragraph 1.8 and it remains that the policy as currently worded can cause unclear and inconsistent policy interpretation and is not based on district or national standards, notwithstanding Grosvenor’s clear support for sustainable densities for the OCGV site.
9. The Inspector’s report for version 1 of the ENP stated that the plan was “so intrinsically linked to the emerging Local Plan that this has proven to be one of the most challenging examinations I have undertaken”. The relationship between the ENP and other elements of the development plan, notably the AAP but also including the Local Plan, has not been adequately addressed in version 3.12 of the ENP and many of the concerns raised remain. The importance of conformity within the development plan has also increased given that the WODC Local Plan was adopted on the 27th September 2018.
10. Although the previous Inspector report states that “proportionate, robust evidence” should support the approach taken by the Neighbourhood Plan, it is not always clear that there is sufficient evidence to support certain policies within the draft ENP. A clear element where this is the case is the references to the phasing of the OCGV site, especially before sufficient baseline evidence has been compiled. Whilst

the revised ENP6 (Education) has now removed the previously drafted criteria B, references remain to the OCGV's phasing or pre-requisites to be met before certain actions or occupation can take place, including but not limited to ENP3b (Infrastructure and Utilities) and Paragraphs 14.10, 16.11 and 16.14. The phasing of any development proposal is best determined through the development management process and not through policy.

11. The Inspector continued to say that “the presentation of the Plan and the relationship between its three component parts – the policies, supporting text and recommendations – which I have found to lack clarity and precision” ... “do not provide a practical framework within which decisions on planning applications can be made”. This observation has also not been adequately addressed within the ENP and some of the Inspector’s concerns remain. For example, ENP7 contains a reference to exceptions in paragraph 7.2, ENP3b in paragraphs 3.15-3.18, whilst some of the provisions in ENP14 (Sustainable Growth) repeat or contradict with ENP3 and paragraph 3.5 introduces allotment standards which are not in policy ENP3. Although it is recognised that significant work has been undertaken to address the Inspector’s concerns, under the first examination, the Neighbourhood Plan unfortunately did not benefit from a series of recommended modifications. As a clear example, site specific policies to the OCGV remain, notably including ENP16. This policy, whilst titled ‘New Settlements’, effectively pre-empts the Garden Village development before the completion of the AAP and its consultation process and is therefore potentially premature.
12. Grosvenor remains committed to progressing an outline application with input from stakeholders including the EFSG and Eynsham Parish Council. It is essential that the Eynsham Neighbourhood Plan is in general conformity with policies in the Local Plan, particularly policy EW1 which also defines the need for an AAP. West Oxfordshire, alongside clear support from Grosvenor, has and continues to provide opportunities to input into the preparation of the AAP to guide the development of the Garden Village. Supported by a site-specific evidence base and programmed to be continued beyond the development of the Neighbourhood Plan and it being made, there are a number of issues highlighted within this representation which are best considered with the AAP. This would avoid wider inconsistency, potential confusing or ultimate conflict between the Local Plan, Neighbourhood Plan and AAP.