

Supplementary Papers



Listening Learning Leading

Contact Officer: Steven Corrigan
Tel: 01235 422526

FOR THE MEETING OF

Council

to be held in The Fountain Conference Centre, Howbery Park, Crowmarsh
Gifford

on Thursday 10 October 2019 at 6.00 pm

Open to the public including the press

1 **Local Plan 2034: options to progress** (Pages 2 - 17)

Attached are further letters of representation.

VIA EMAIL on 6 October 2019

Dear Sue,

I am writing to you as a fellow councillor and citizen of Oxfordshire ahead of the important decision you will be taking next week, because this decision will have a significant impact not just on South Oxfordshire but on the city of Oxford and residents and businesses across the county.

The decision on whether or not to continue with the existing South Oxfordshire Local Plan 2034 process is of course yours to make along with your fellow SODC councillors. However, you shouldn't be surprised about the level of interest and concern here in Oxford, in the other Districts and, in particular, in the Vale of White Horse about that decision because of its wider impact.

You will have seen the letters from [Rt Hon Robert Jenrick MP, Secretary of State at MHCLG and the department's director general, Tom Walker](#), that made clear that £218 million of investment from the Government's Housing Infrastructure Fund for much-needed new road and cycle infrastructure to relieve traffic congestion in and around Didcot is dependent on the local plan proceeding. The Minister also made clear that a decision to withdraw your local plan would leave the Government less inclined to provide other local infrastructure funding to Oxfordshire, both now and in the future.

All six Oxfordshire councils supported the Didcot proposal as the first choice for funding and in doing so chose to place it ahead of bids which would provide benefit more directly in other districts.

You will also be aware that [Cllr Emily Smith, Leader of Vale of White Horse District Council](#) made an impassioned plea that you weigh up the consequences for your neighbouring authority if you withdraw your local plan. Without the improved transport infrastructure around Didcot, some of Vale's housing developments won't be able to proceed, eroding its 5 year land supply. That would open the door to more speculative, unplanned and unwanted housing developments.

I appreciate that some councillors in SODC find themselves in a difficulty, feeling that they were elected to oppose some aspects of the SODC local plan. However, I do think that being responsible for rejecting millions of pounds of much needed infrastructure for Oxfordshire (and Didcot in particular) in order to fulfil this pledge is unwise to put it mildly. You might have preferred not to start from this point, but the responsibilities of the council have to take into account the complexities of the planning process, the reality of interdependency and how infrastructure funds can be secured.

Your Cabinet has highlighted a number of concerns about the local plan in terms of overall housing numbers and location and is proposing to withdraw the plan. But the choice isn't binary – there are ways of addressing these concerns within the current inspection process. You may take some comfort from the questions issued by the inspector, that he is wanting to review and challenge some of the very same issues that your Cabinet might wish to review. The opportunities to change the local plan will be greater with this process than running the very real risk of having the whole planning process taken out of your hands.

VIA EMAIL on 6 October 2019

The inspection process will provide an opportunity to debate and achieve some tangible movement on these issues within only a few months. This is a quicker and more pragmatic route to being able to address these issues. Increasing public focus on the inspection process and highlighting alignment with the Inspector over some of the fundamental areas of concern would demonstrate purpose and effectiveness by your council to residents and stakeholders. Shortly thereafter the council would be able to bring forward supplementary planning guidance to reinforce its chosen policies.

This would seem significantly quicker and surer than returning to earlier stages in the plan process. It is highly likely that if you were to start again on your local plan many aspects would still end up in a not dissimilar place. If you were to use the local plan inspection process to your advantage, this would allow SODC to continue to engage with neighbouring authorities in a way that allows us to work together as partners, with the opportunities that this brings for more funding and for more powers.

It would also demonstrate to central Government that we are delivering on the issues that we have already agreed with them, such as the Growth Deal and its associated funding for more affordable housing and further transport infrastructure improvements – including measures important locally in South Oxfordshire like the Watlington and Benson relief roads, Didcot Jubilee roundabout improvements and Thame to Haddenham cycle route. Withdrawal of the local plan could also put these schemes and affordable housing projects in South Oxfordshire in jeopardy.

There have been no major infrastructure funds available for Oxfordshire for some decades. Now, through cooperation among all the councils, we have money to make infrastructure improvements in the south of the county that will be welcomed by many residents and businesses in South Oxfordshire and beyond. I understand that a number of Parish and business representatives spoke in favour of retaining the Local Plan at SODC Cabinet meeting.

I believe it would be nothing short of a tragedy if the people of Oxfordshire were to lose out on hundreds of millions of pounds of potential future funding as well as the current funding as a result of such a decision by SODC. It doesn't have to be like that; an effective use of the local plan inspection process offers a different outcome.

The decision to stick with the existing plan may seem the more difficult one to make at the moment, but the short term satisfaction of being able to say that the plan is withdrawn and that you are starting again is likely to be just that, short term. The full consequences will be longer term but I think more impactful. These are the withdrawal of promised infrastructure funding, the impact on relationships with us, your neighbouring councils and our ability to work together in the common interest, our collective relationship with government which has recently enabled us to secure this sort of infrastructure funding to support housing, the impact on your ability to deliver a planning service and influence any new local plan and perhaps worst of all, the impact on the Vale of White Horse who will be in a situation where they will be subject to speculative development.

VIA EMAIL on 6 October 2019

I know that some of you to whom I am sending this email are already committed to voting to keep your local plan and use the planning process to get through the changes you would like to see. I would like to thank you and I hope that there are enough of you to ensure that this potentially very damaging recommendation from the SODC cabinet is not carried.

We want Didcot to get this funding, but the only way to secure it is to proceed with your local plan.

Please do not hesitate to contact me if you wish to discuss any of the points I have raised. My email is cllrsbrown@oxford.gov.uk and my mobile number is

██████████

Best wishes

Susan

Councillor Susan Brown
Leader of Oxford City Council
Councillor for Churchill Ward



Date: 8th October 2019

Cllr Susan Cooper
 Leader of the Council
 1 Lower End
 Benson Road
 Ewelme
 Wallingford
 OX10 6HB

Our Ref: 1259/JCE

Dear Councillor Mrs Cooper

Re: SODC Full Council meeting 10th October 2019 – Local Plan 2034

Further to my letter of 3rd October 2019 and following the Cabinet Meeting, when it was resolved to proceed with Option C, this is a supplemental letter on behalf of the Pyrton Manor, Shirburn Castle and Environs Alliance (PMSCEA). PMSCEA represents important Heritage assets at Shirburn Castle and Pyrton Manor to the north of Watlington, together with the Pyrton Parish Council and the Shirburn Parish Meeting.

PMSCEA are fully supportive of the Council's decision thus far to pause the emerging Local Plan process and proceed with Option C:

Option C) Withdraw the Local Plan from examination. The Council would commence work on a new Local Plan. This will allow the Council to prepare a significantly different plan (subject to compliance with the law, and national policies and guidance). The Council would need to undertake at least two rounds of public consultations. (Regulation 18 and 19) before submitting the new plan for examination.

PMSCEA have followed the progress of the Council in the intervening period, and have noted the Local Plan 2034; Options to progress Report to Cabinet (3rd October 2019) by the Head of Planning. We confirmed that PMSCEA would support the Council in selecting Option C above.

SOUNDNESS OF EMERGING LOCAL PLAN

We are aware that any decision to withdraw the emerging Local Plan must be made on sound planning principles which we believe will support the decision of your Cabinet for Option C, against Option A or Option B, for the reasons below.

OXFORD CITY COUNCIL UNMET HOUSING NEED

Consideration of the emerging Local Plan at this stage is being made prior to Oxford City Council's calculation of their Unmet Housing Need. The revised timetable for Local Plan as anticipated under Option C will enable this important housing number to be accurately calculated and then properly factored onto a new SODC Local Plan. It will enable consideration of the brownfield potential in particular within the City itself, and take advantage of the established employment opportunities afforded by sites close to or within Oxford.

EVIDENCE BASE

The report to Cabinet makes it clear that the emerging Local Plan is now being considered on historic evidence, some of which is shortly (November 2019) to be out of date. The report confirms that some of the evidence is over 5 years old and, in particular, the Transport Model will not be WebTag compliant after November 2019. Given the likely timetable for the examination of the emerging Local Plan by the Inspectors, their decision on the soundness of the Local Plan will have been made on a model(s) that are no longer compliant.

The general concern at the outdated and historical nature of much of the Evidence Base in the emerging Local Plan was, in part, evidenced by the defeat of the Motion to recommend Option A at the Scrutiny Committee of the 1st October 2019.

The benefit of a new suite of evidence based studies within Option C provides opportunities to work with neighbouring authorities in Oxfordshire, Berkshire and Buckinghamshire and to have a sound base for any potential future legal challenge or assist in defending planning appeals as confirmed by the Report.

GROWTH DEAL & HOUSING INFRASTRUCTURE FUNDING

The risk to the Growth Deal and the Housing Infrastructure Funding has been set out in the Report to Cabinet, with appendices containing the correspondence with the MHCLG. Whilst a letter from the Director General, Decentralisation and Growth dated 20th September 2019 sets out that Option C "will not be without consequences", it does also confirm that MHCLG remain committed to working with partners to continue to deliver the ambitions of our partnership.

The underlying strategic, commercial, educational, medical, technological and cultural strengths, together with the important geographical location of Oxford/Oxfordshire and the five SODC resolutions made on the 18th July 2019, will make a compelling case for the retention of the Growth Deal and the HIF.

SELECTING OPTION C

When confirmed by Full Council, the decision by your Cabinet on Thursday 3rd October to select Option C will enable a new Local Plan to be considered on an updated and current evidence base, to take account and recognise the Climate Change Emergency, the Climate Change Act 2008 and the urgent need to make real progress on this statutory responsibility. It will also enable consideration of the actual Unmet Oxford City Housing Need and of working in collaboration with adjoining County and District Councils.

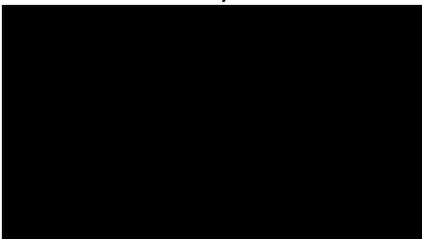
CONCLUSION

The Pyrton Manor, Shirburn Castle and Environs Alliance therefore sincerely thank Members for their support of Option C thus far, and strongly urge the SODC Full Council to adopt Option C at its meeting on Thursday.

This letter has been copied to all Members of the Council.

Kind regards.

Yours sincerely



Senior Partner

cc: All Members of SODC Full Council
All Members of SODC Cabinet
Adrian Duffield – Head of Planning, SODC

The Pyrton Manor, Shirburn Castle and Environs Alliance
Mark Stone – Chief Executive, SODC
Andrew Down – Acting Deputy Chief Executive, SODC

Margaret Reed – Head of Legal & Democratic Services, SODC
Democratic Services, SODC

Sent by email to: sue.cooper@southoxon.gov.uk

09/10/2019

Dear Cllr Cooper

South Oxfordshire Local Plan

We are writing to express our concern, which reflects conversations with our membership, regarding the decision made by Cabinet last week to recommend that the Council withdraws its local plan from examination and commences the preparation of a new plan. This decision has been made despite the concerns not only of your neighbouring authorities, who are working in partnership to deliver the growth needed to support Oxfordshire's nationally significant economic ambitions; and Government, which has committed considerable financial resources to support the County to meet its sustainable development objectives. The Government have made it clear that the benefits agreed as part of the Growth Deal, comprising vital infrastructure and affordable housing funding and the requirement to demonstrate a three-year supply of housing land during the preparation of the joint local plan are dependent on all the Oxfordshire planning authorities adopting plans to meet agreed levels of growth. Withdrawal of the South Oxfordshire Local Plan from examination will place the Growth deal, and the benefits that will accrue for all authorities in Oxfordshire, in jeopardy.

We would therefore like to add our concerns to those raised by your neighbours and Government. However, alongside the concerns regarding the wider impact on joint planning and infrastructure funding, we are surprised the Cabinet's decision has seemingly ignored the fact that withdrawing the plan will prevent the Council from achieving its stated ambitions.

The report to Cabinet clearly expressed the risks that the Council will face from not having an up to date local plan in place. Halting the progress of the current document will create a policy vacuum that will take a considerable time to fill, during which time the Council will be at far greater risk of speculative applications being made over which it will have much less influence due to the lack of an up to date policy framework to which due weight can be attached in the decision-making process. The Government is committed to a plan-led approach to development control as the most effective means of addressing the national housing crisis; a Council that chooses to abandon this approach will need to be reconciled to decision-making being taken out of its hands until it is able to provide a properly evidenced up to date policy framework. The most effective way to manage growth in pursuit of sustainable development is to ensure that a Local Plan is adopted expediently, having been subject to objective and thorough examination in public. This option remains available to the Council, and Government

has advised in writing that the administration's ambitions can be addressed via the examination process with which you are already engaged. A decision to step-away from this process now will have significant implications not only for infrastructure funding and affordable housing delivery across the County, but also for the Council in managing development in the short to medium term. We urge the Council to consider this decision with great care and to recognise that it would be advisable to proceed with the examination of the submitted plan, taking the opportunity to test the evidence base fully in concert with the Inspectors and the many interested parties already engaged with the process.

It is also important to recognise that any plan will need to meet housing needs in full and take into account the unmet needs of neighbouring areas in addition to planning responsibly for sustainable development. Housing supply obligations will be tested fully through the examination process, and the appointed Inspectors have already raised this issue with you. The examination will consider this matter carefully and comprehensively and will require the evidence on which the Plan's housing requirement is based to be up to date and robust. Any concerns that may arise in this respect will be fully and properly tested through the examination. Withdrawing the Plan and embarking on a fresh Regulation 18 evidence gathering exercise offers no guarantee that housing numbers will be substantially different to those currently contemplated given the prevailing situation within Oxfordshire.

We would suggest that the most appropriate approach and one that would allow the Council to deliver development in the most sustainable manner is through the plan that has been submitted to the Government. Whilst it is acknowledged that all local planning authorities are obliged to submit a plan they consider to be sound for the purposes of examination, this does not preclude significant changes to the Plan being made via the examination process. Therefore should, for example, the Inspectors examining the Oxford City Local Plan (who are scheduled to examine the South Oxfordshire Plan in due course) consider that the unmet housing needs of the City have been over estimated modifications could be made to the plan reflecting this position.

Finally, it would appear from the motion being placed before Council that there is an aspiration that Government will help to fund preparation of a new local plan. We suggest that this is unlikely and that the full cost of preparing a new plan and the supporting evidence will be borne fully by the Council and local tax payers. Given the strained resources faced by local authorities at present we again urge the Council to consider this very carefully.

In conclusion we suggest that the most appropriate course of action would be that recommended by officers to Cabinet – to continue with the examination of the current local plan. This will offer the Council the greatest scope to manage development in future whilst also ensuring the development and infrastructure needs of your neighbours in Oxfordshire are not compromised. It will also provide a clarity and certainty as to where development will occur in future that is a benefit to both the house building industry and the general public.

Yours faithfully



Planning Manager – Local Plans
Home Builders Federation





South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

SENT BY EMAIL

8th October 2019

Dear Councillor,

**FULL COUNCIL MEETING RELATING TO THE SOUTH OXFORDSHIRE LOCAL PLAN
- THURSDAY 10TH OCTOBER 2019**

Ptarmigan Land act on behalf of the Landowner at Mount Farm, Berinsfield in promoting the proposed draft Local Plan allocation for around 1,700 homes which in turn will deliver much needed regeneration benefits for the village.

Ptarmigan have been working closely with your officers in the Delivery and Regeneration team over the last two and a half years and the landowner remains committed to facilitating delivery of this important scheme. I write to ask you to consider the comments below relating to the need for development at Berinsfield when making a decision on the proposed way forward with the Local Plan at Full Council on Thursday 10th October.

The case for new development being the way to deliver the regeneration of Berinsfield was made and accepted by the Government Inspector that examined the Core Strategy which was adopted back in 2012. As it stands today there has been no change in the need case at Berinsfield and therefore the merits for development remain and, as time passes, strengthens in weight.

However, the local community have been frustrated and let down many times over the years by the absence of process in delivering the regeneration objectives of the village. Despite this there remains significant local support for the proposals and it would be a shame to lose the momentum and good will that has been built, particularly over the last three years.

An adopted Local Plan combined with the landowners and support from Ptarmigan is the very mechanism that would see the vision for Berinsfield turn from hope to reality. With this in mind, we would urge you, in the interests of the residents of Berinsfield, to allow the Local Plan to proceed to examination.

You will be aware that in June of this year the Council were awarded Garden Village status by Homes England specifically for Berinsfield, potentially bringing with it much



needed capacity funding that will accelerate delivery of the project. The award was recognition of both the benefits of the proposals and also the hard work and dedication of your officers who have committed significant physical and financial resource over many years to get to this position. Despite such positive news we are faced with a position where withdrawal of the Local Plan would pose a significant risk to the funding being secured and with it the Garden Village status could be lost and that would represent a significant lost opportunity.

Lastly, a key element of discussions regarding the options for the Local Plan centre on monies being secured under the Housing Infrastructure Fund. Berinsfield is one of the sites explicitly referenced within the bid as being reliant upon the infrastructure that the funding will deliver. The County Council have made their position clear that without HIF there can be little to no development at Berinsfield in Highway's capacity terms so any decision that has the potential to jeopardise securing the funds could again frustrate and delay attempts to deliver the regeneration that Berinsfield needs.

We appreciate the complexity of the difficult decision that needs to be taken at the meeting this Thursday. For all the reasons outlined above we would urge you to consider the needs of the residents of Berinsfield and vote to allow the Local Plan to proceed to examination which would avoid yet further disappointment and frustration at the lack of meaningful progress in delivering the promised regeneration benefits.

Yours sincerely,
For and on behalf of the Ptarmigan Group

SENT ELECTRONICALLY WITHOUT MANUAL SIGNATURE

██████████
Associate Director
██████████
████████████████████

Senior Management Team



Adrianna Partridge
South Oxfordshire District Council

135 Eastern Avenue, Milton Park,
Milton, Abingdon OX14 4SB

By email

8 October 2019

Dear Adrianna

SODC local plan

Further to the publication of the cabinet report to consider the emerging South Oxfordshire Local Plan, I write to you as the Acting Deputy Chief Executive – Partnership and Planning, on behalf of Vale of White Horse District Council.

I have read the officer report relating to the South Oxfordshire Local Plan and welcome the clear officer recommendation and rationale to continue with the Local Plan through its examination – ‘Option A’. I am conscious, however, that Cabinet has recommended to Council that the South Oxfordshire Local Plan be withdrawn, with a final decision expected on Thursday 10 October.

The Leader of the Vale of White Horse has already expressed her concerns relating to the risks associated with the potential loss of Housing and Infrastructure Fund and the possible impacts upon the five year housing land supply for the Vale. As you know, the Vale’s Local Plan Part 1 is to a significant extent reliant on this funding for delivery of the infrastructure in order to support committed housing. For example, there would likely be concerns raised by Oxfordshire County Council to Valley Park in relation to impacts to the highway network. Moreover, the delivery of 5,000 homes in the Vale of White Horse would be put at risk as a result of lack of funding for the Didcot Garden Town HIF and its necessary infrastructure, and with a significant adverse effect on the five year housing land supply.

If homes cannot be delivered in Vale owing to the consequences of a withdrawal of the South Oxfordshire Local Plan, would the revised or new South Local Plan include, above your own housing need, allocations for the homes that Vale cannot then immediately deliver - a further source of unmet housing need?

In the event that the Local Plan is withdrawn, it is unlikely that South Oxfordshire District Council would be able to continue to be a signatory to the existing Statements of Common Ground with the other Oxfordshire authorities, as is acknowledged in the recommendations made to Council for consideration on 10 October. South

Oxfordshire District Council would, however, need to demonstrate how it has complied with the Duty to Co-operate from this point forward.

All relevant material considerations, including the negative planning consequences of a decision to withdraw and the consequences of the decision must be considered in any Council decision. This includes the severity of housing need, including unmet need from the City, the Duty to Cooperate, the impact upon neighbouring authorities, and the impact upon Didcot Garden Town.

I would be grateful if you would keep me updated on the decision of South Oxfordshire District Council on its Local Plan.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Down', with a long horizontal flourish extending to the right.

Andrew Down
Acting Deputy Chief Executive – Partnership and Planning

Planning and Strategic Housing

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Elmfield
New Yatt Road,
WITNEY,
Oxfordshire,
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Tel: 01993 861000
www.westoxon.gov.uk



Holly Jones
Planning Policy Manager
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
OX14 4SB

Your Ref :
Our Ref :
Date : 10 October 2019

Dear Holly

South Oxfordshire Local Plan 2034

I am writing to you in relation to the potential withdrawal of the South Oxfordshire Local Plan.

As you will be aware from our formal response in February, West Oxfordshire District Council is very supportive of the positive approach that South Oxfordshire had taken in its submission draft plan in terms of housing numbers and distribution. This addressed a number of primary concerns that West Oxfordshire and the other Oxfordshire local authorities had previously expressed in 2017.

The positive progress made in South Oxfordshire helps to underpin the Oxfordshire Housing and Growth Deal signed with Government which, as you aware commits the Oxfordshire local authorities to the delivery of 100,000 new homes by 2031.

It also supports the two Housing and Infrastructure Fund (HIF) bids that have been put forward to Government in relation to Didcot Garden Town and the A40.

The withdrawal of the South Oxfordshire Local Plan at this key stage places all of these initiatives at significant risk. It will also presumably place South Oxfordshire District under increased pressure from speculative development and the inevitable process of 'planning by appeal'.

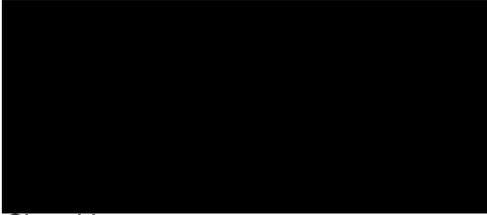
The Oxfordshire authorities have worked extremely hard in accordance with the Duty to Co-Operate to reach a point at which we have a plan-led system. The Oxfordshire Plan 2050 and the associated planning freedoms and flexibilities attached to it, provide the opportunity to ensure this is carried forward, allowing for growth to be delivered in a positive manner supported by appropriate investment in place making and critical infrastructure.

We therefore have major concerns that any decision to withdraw the South Oxfordshire Local Plan would undermine the significant progress that has been made in recent years and place at risk not just South Oxfordshire but all of the Oxfordshire local authorities as we look to move forward in a positive, plan-led manner.

I note with interest the recent letter to South Oxfordshire from the Secretary of State for Housing, Communities and Local Government which directs the Council not to take any step in connection with the adoption of the Local Plan and trust that this will help lead to a sensible outcome in the interest of Oxfordshire as a whole.

If you wish to discuss any of the issues outlined above, I would welcome a further discussion with you, so please feel free to get in touch.

Yours sincerely



Chris Hargraves
Planning Policy Manager
West Oxfordshire District Council



Cllr Sue Cooper
Leader
South Oxfordshire District Council
135 Eastern Ave
Milton, Abingdon
OX14 4SB

**Ministry of Housing, Communities and Local
Government**

4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

Tel: 0303 444 3450

Email: robert.jenrick@communities.gov.uk

www.gov.uk/mhclg

Dear Sue

9 October 2019

Following South Oxfordshire District Council Cabinet's decision on 3 October to recommend withdrawing the emerging South Oxfordshire Local Plan ("the Plan"), I am considering whether to give a direction to South Oxfordshire District Council in relation to the Plan under section 21 of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act").

The government remains committed to making sure every community has an up-to-date and sufficiently ambitious Local Plan. Withdrawing the Plan at this stage is instead likely to create uncertainty and expose communities to speculative planning applications.

Therefore, in exercise of the powers under section 21A of the 2004 Act (inserted by section 145(5) of the Housing and Planning Act 2016), I hereby direct South Oxfordshire District Council not to take any step in connection with the adoption of the Plan, while I consider the matter further. This direction will remain in force until I withdraw it or give a direction under section 21 of the 2004 Act in relation to the Plan.

I would like to work constructively with you to ensure that South Oxfordshire is able to deliver the high-quality homes and infrastructure required to support jobs and growth in the local community. As I set out in my letter to you on 26 August 2019, progressing the Plan is an essential step to delivering the Oxfordshire Housing and Growth Deal. I have therefore asked my officials to get in touch with your officers to discuss next steps and will keep you updated while I consider this matter further.

RT HON ROBERT JENRICK MP