

[REDACTED]
Planning Policy Officer
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Milton
Oxfordshire
OX14 4SB

Date: 30 September 2019

Your ref:

Our ref: [REDACTED]

Direct:

Email:

[REDACTED]

Dear Sirs

**Town and Country Planning Act 1990
South Oxfordshire Local Plan Submission Version (2034)
Report to Scrutiny Committee 1 October 2019**

We act for Summix Limited in connection with the above matter and have been asked to comment upon the report prepared for the meeting of the Scrutiny Committee on 1 October 2019. You will be aware that we have made previous submissions and this correspondence should be read alongside our earlier letter dated 8 July 2019 (as attached).

We note that the report considers again the options available to South Oxfordshire District Council in the promotion of the emerging Local Plan. We have commented before in evaluation of these options and this is reflected in the attached correspondence.

It is important to reiterate the impracticality of the District Council continuing with a Local Plan that they do not support and that the submitted Local Plan is of no value whatsoever if it doesn't reflect the intention and aspiration of the District Council. Any failure to meet this simple objective will inevitably mean that the District Council will face insurmountable difficulties in providing the necessary responses to the Inspector, objectors and, most importantly, the public as the Local Plan proceeds through Examination.

These concerns are paramount in the District Council's continued promotion of the draft Local Plan because its policy provisions are built entirely upon the foundations of an inflated and "ambitious plan" for significantly increased housing provision that has then justified the proposed Green Belt releases. This proposition will inevitably be the subject of significant objection and the Inspector will be under a specific duty to test these concerns by reference to paragraph 137 of the NPPF and, ultimately, the District Council will be required to provide robust and convincing evidence to support its policy ambitions.

These issues will be forced into further sharp focus for Councillors where the Local Plan Inspector seeks further clarification as to the District Council position in response to objections that seek the removal of housing allocations from the Green Belt. This will inevitably present significant tensions and difficulties for Councillors and, not least, where concerns as to sustainability, energy efficiency and climate change are validly raised.

There isn't, in this context, any realistic prospect that the District Council can contemplate proceeding with Option A or Option B with a view to making "potential changes" during the plan process to better reflect the intention of Councillors. We know from other Local Plan Examinations that the appointed Inspector has very limited scope in accepting any such

changes and it is clear that any fundamental change in housing strategy will simply serve to undermine the whole plan process.

The reality is that once this course is set the District Council will come under further pressure from Oxford City Council and Oxfordshire County Council to proceed with the Local Plan and, at every turn, Councillors will be asked to endorse the policy provisions of that submission document both during Examination and, ultimately, by its adoption as the District Local Plan.

Councillors will then have to deal with the subsequent planning applications and, quite rightly, will be advised by officers that they have no other choice than to support Green Belt development that is consistent with up-to-date and adopted Local Plan policies. This is because the emerging Local Plan is only the start of a process in the development of a housing strategy for South Oxfordshire which will ultimately inform the submission and then the determination of a series of future planning applications.

Again, if Councillors have a concern as to that initiative this is the moment to take action and the only obvious solution for the District Council is to proceed with Option C in the provision of a Local Plan that reflects the true intention and purpose of the District Council's elected Councillors.

We trust the above submissions are of assistance.

Yours faithfully

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Eversheds Sutherland (International) LLP