

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

