



Date: 1 October 2019

Cllr Susan Cooper
1 Lower End
Benson Road
Ewelme
Wallingford
OX10 6HB

Our Ref: 1259/JCE

Dear Councillor Mrs Cooper

Re: Local Plan 2034; options to progress

We act on behalf of the Pyrton Manor and Shirburn Castle Environs Alliance (PMSCEA) which represent 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 to pause the emerging Local Plan process and note that at the Council Meeting held on 18th July 2019 it resolved to:-

- “(1) express its determination to maintain its housing land supply and avoid speculative development;*
- (2) express its continued support for the Housing and Infrastructure Fund (HIF) funding and infrastructure projects that could be delivered by it;*
- (3) ask officers to explore with Oxfordshire County Council, Homes England and the Ministry of Housing, Communities and Local Government options for protecting the HIF funding whilst enabling the council to address concerns about the current emerging Local Plan 2034 including (but not limited to) climate change issues, Oxford City's unmet housing need, and to report back to Cabinet and Council;*
- (4) recognising that the Climate Change Emergency is all too real and is recognised to be of key and statutory importance under the Climate Change Act 2008 and the associated objective of “zero carbon by 2050”, express its wish to do all that I can to respond through the Local Plan process;*

- (5) *agree that as soon as practicable, alongside satisfactory progress being made on resolving issues in the emerging Local Plan, work on a subsequent Local Plan shall commence, strengthening climate change considerations.”*

At the same Council Meeting on the 18th July 2019, the following three options were identified as currently open to the Council to progress the emerging Local Plan:-

- Option A) allow the emerging Local Plan to continue through its examination. Any modifications proposed during the examination will be considered at the sole discretion of the Inspectors.*
- Option B) Withdraw the Local Plan from examination and make changes to it ahead of a further regulation 19 consultation and resubmission to the Inspectorate for examination. The extent of the changes to the Plan that would be possible under Option B would be limited to no significant changes, in comparison to those that could be made under Option C. Any representations made at that Regulation 19 would be reported to and considered by the Inspector and would not be within the control of the Council.*
- 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.*

The 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 and confirmed that PMSCEA would support the Council in selecting Option C above. We are aware that any decision to withdraw the emerging Local Plan must be made on sound planning principles which we believe will support this decision.

Consideration of the emerging Local Plan at this stage is being made prior to Oxford City Council calculation of their Unmet Housing Need. A revised timetable as anticipated under Option C will enable this important housing number to have been accurately calculated and then properly factored onto the SODC emerging Local Plan.

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 Transfer 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 of the soundness of the Local Plan will have been made on a model(s) that are no longer compliant.

The benefit of a new suite of evidence based studies in 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 assisting in defending planning appeals as confirmed by the Report.

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 the 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”. Important decisions on proper future planning of the District should not be based on financial considerations.

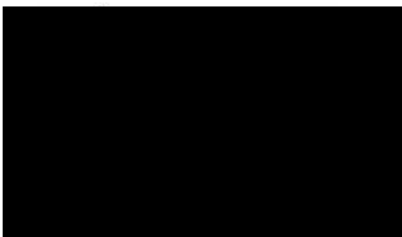
The underlying strategic, commercial, educational, medical technological and cultural strengths together with the important geographical location of Oxford/Oxfordshire together with the five SODC resolutions made on the 18th July 2019 will make a compelling case for the retention of the Growth Deal and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

Whilst your Officer’s recommendation is to accept Option A they go on to say that Option C is preferable to Option B and in the view of the PMSCEA this would allow the Council to achieve the objectives previously outlined.

A decision to select Option C would enable a new emerging 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, to have been able to consider the actual Unmet Oxford City Housing Need and to work in collaboration with adjoining County and District Councils. The PMSCEA would therefore fully support Option C.

Kind regards.

Yours sincerely



Senior Partner

cc: Adrian Duffield – Head of Planning – SODC



The Pyrton Manor, Shirburn Castle and Environs Alliance