



Date: 3<sup>rd</sup> October 2019

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

Our Ref: 1259/JCE

Dear Councillor Mrs Cooper

**Re: SODC Cabinet meeting 3rd October 2019 – Local Plan 2034**

Further to my letter of 1st October 2019 and following the Scrutiny Committee meeting on Tuesday 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 to pause the emerging Local Plan process and note that at the Council Meeting held on 18<sup>th</sup> 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 Scrutiny Committee Meeting on 1<sup>st</sup> October 2019, the following three options were identified in the Report to Committee 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.*

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 (3<sup>rd</sup> October 2019) by the Head of Planning, and confirmed that PMSCEA would support the Council in selecting Option C above.

## **1. SODC SCRUTINY MEETING 1<sup>st</sup> OCTOBER 2019**

We note that at the Scrutiny Committee at their meeting on 1<sup>st</sup> October 2019, the Motion to Recommend Option A to your Cabinet was defeated.

On the basis of this defeat the recommendation of your Officers in their above report is that Option C, to withdraw the emerging Local Plan, is preferable to Option B.

## **2. 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 a decision of your Cabinet for Option C, against Option A or Option B, for the reasons below.

### **3. OXFORD CITY COUNCIL UNMET HOUSING NEED**

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

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

There were further queries raised at the deliverability of the housing numbers set out in “Table 1 Stepped Housing Requirement, Option A”. (Page 29 of Report to Scrutiny Committee)

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 1<sup>st</sup> October 2019.

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.

### **5. 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 20<sup>th</sup> 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, together with the five SODC resolutions made on the 18<sup>th</sup> July 2019, will make a compelling case for the retention of the Growth Deal and the HIF.

## 6. OFFICERS RECOMMENDATION

The SODC Officer's recommendation was not accepted by the Scrutiny Committee and, in this scenario, it was confirmed by your own Officers that Option C is preferable to Option B. In the view of the PMSCEA this would allow the Council to achieve the objectives previously outlined.

## 7. SELECTING OPTION C

A 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; to have been able to consider the actual Unmet Oxford City Housing Need and to work in collaboration with adjoining County and District Councils.

## 8. CONCLUSION

The Pyrton Manor, Shirburn Castle and Environs Alliance therefore fully support Option C, and strongly urge the Cabinet to adopt this Option tonight.

Kind regards.

Yours sincerely



**Senior Partner**

cc: Adrian Duffield – Head of Planning, SODC

[Redacted Name]  
 The Pyrton Manor, Shirburn Castle and Environs Alliance  
 Cllr David Turner – Vice Chair Cabinet Committee, SODC  
 Cllr Pieter-Paul Barker – Cabinet Committee Member, SODC  
 Cllr Robin Bennett – Cabinet Committee Member, SODC  
 Cllr Maggie Filipova-Rivers – Cabinet Committee Member, SODC  
 Cllr Andrea Powell – Cabinet Committee Member, SODC  
 Cllr Leigh Rawlins - Cabinet Committee Member, SODC  
 Cllr David Rouane - Cabinet Committee Member, SODC  
 Mark Stone – Chief Executive, SODC  
 Andrew Down – Acting Deputy Chief Executive, SODC  
 Simon Hewings – Strategic Finance Manager, SODC  
 Margaret Reed – Head of Legal & Democratic Services, SODC  
 Democratic Services, SODC