

South Oxfordshire Local Plan 2034

Publication Version Representation Form

Please return by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text" value="Mrs"/>	<input type="text"/>
Full Name	<input type="text" value="Helen"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Marshall"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="CPRE OXFORDSHIRE"/>	<input type="text"/>
Address Line 1	<input type="text" value="20 High Street"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="Watlington"/>	<input type="text"/>
Postcode	<input type="text" value="OX49 5AF"/>	<input type="text"/>
Telephone Number	<input type="text" value="01491 612079"/>	<input type="text"/>
Email Address	<input type="text" value="campaign@cpreoxon.org.uk"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

Foreword, p.5

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The leader's foreword is at best misleading and therefore unsound.

The Council's Statement of Community Involvement (SCI) states at 1.1 that *South Oxfordshire District Council is committed to working in a clear and transparent way.*

The foreword written by the Leader and Cabinet Member for Planning is the most likely section for members of the public to rely on for a clear and transparent exposition of the strategy and of the scope and intention of the Plan.

It is at best misleading.

- a. At line 2 it states that the Local Plan "sets out the identified need for housing and employment" whereas in fact, as page 31 makes clear, it relies on the 2014 SHMA (Strategic Housing Market Assessment) for its "evidence base", a SHMA that is now out of date. The household formation projections and population forecasts on which it is based have now been replaced by the 2016 projections – both lower – and if the SHMA were to be updated as it should have been, and as neighbouring Oxford has done, it could reasonably be expected to come up with a much lower figure. Furthermore, the SHMA is now discredited as a mechanism for determining housing need and has been replaced by the new Objectively Assessed Need (OAN). The base of the new OAN would be approximately half the level of the SHMA and, although a floor not a ceiling, would almost certainly have led to a different total housing projection.

In fact, as page 31 also makes clear, the numbers in the Plan derive wholly from the Growth Deal, a Faustian pact between Local Councils and the Government, in which Oxfordshire Councils have agreed to build several multiples of the number of houses the pact itself explicitly recognises to be required, for money. The Growth Deal is referred to in the statement but is not acknowledged to be the actual driver of the Local Plan.

It is only right that the public should be advised of the true foundation and nature of the Plan on which they are being consulted, the outcome of which is a 50% increase in both housing stock and – as there is no underlying local need – population in the 23 years from 2011 to 2034. Instead they are being told that the Plan seeks to satisfy an “identified need for housing and employment” which any reader would take to be an actual need arising from the resident population. It is in any case not a “need” at all but an aspiration by our elected Local Governments to transform the nature of our area behind our backs.

- b. The Leader’s statement continues that “we had planned to submit the November 2017 Publication version for examination but have reviewed the allocations amidst uncertainty regarding deliverability”. In fact, the allocation on which the uncertainty centred – Chalgrove-remains in the Plan albeit somewhat reduced. The key change from the 2017 submission to this one is the introduction – specifically ruled out in the previous plan process – of the Green Belt releases around the fringe of Oxford City. Although 75% of the Oxfordshire and South Oxfordshire public is known to consider that Green Belt land should not be built on¹, and this is by far and away the most significant difference between the 2017 and 2019 plans, it is not mentioned.
- c. Neither is it mentioned that the number of houses planned has increased substantially between the two versions (although both claim to rely for their evidence base on the same 2014 SHMA figures). The main cause of the difference is a substantial increase in the contingency provided, although neither the increase in numbers nor its rationale are referred to.
- d. The Leader’s statement refers to “several rounds of public consultation” and seeking to address many of the issues that have been raised”. The previous rounds of consultation were however of a very different plan, notably in relation to both numbers and the Oxford Green Belt (and are, we submit, irrelevant to and not precursors of this Plan).

Public Consultation is an essential ingredient of the development of a Local Plan and the public is entitled to have the strategy and evidence presented in a clear and transparent way as indeed the District’s SCI requires.

Although the whole plan is similarly opaque, the public is entitled above all to a clear accurate statement of strategy and justification from its elected representatives.

The foreword falls far short of that requirement, to the extent that it is at best misleading and is therefore unsound. As it is intended to be a precis of the key ingredients of the Plan, the Plan itself is equally unsound because of its inadequacy.

¹ **Attitudes to the Oxford Green Belt Survey, 2015:** <http://www.cpreoxon.org.uk/news/item/2447-cpre-survey-shows-majority-don-t-want-to-build-on-green-belt?highlight=WyJncmVlbiIsIidncmVlbiIsImdyZWVuJyIsImJlbHQiLCJiZWx0JyIsImJlbHQnLCIsImJlbHQnLiIsImJlbHQncyIsInN1cnZleSIzImdyZWVuIGJlbHQiLCJncmVlbiBiZWx0IHN1cnZleSIzImJlbHQgc3VydmV5II0=>

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

As a minimum, the Foreword should be re-written to:

- Explain clearly the difference between identified need and the higher numbers being proposed to fulfil the Growth Deal
- Draw appropriate attention to the newly proposed incursions into the Green Belt
- Identify and explain the rationale for the contingency in housing numbers.

However, given the significant changes between this Plan and that previously consulted on, we submit that a new Regulation 18 consultation is in fact required.

(Continue on page 4 if necessary)

Would you like to participate at the oral part of the examination, which takes place as part of the examination process? *

Yes

No

* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:

(this can be electronic)

Date:

15.2.19

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of

the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit www.southoxon.gov.uk/dataprotection

Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

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