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| South Black and White Logo | **South Oxfordshire Local Plan 2033**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** | |  | |
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| **Name of the Local Plan to which this representation relates:** | | | | | | | | South Oxfordshire Local Plan 2033 | | |
| **Please return by** **5pm on Thursday 30 November 2017 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) | | | | | | | | | | |
| This form has two parts:  **Part A** – Personal Details  **Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make. | | | | | | | | | | |
| **Part A** | | | | | | | | | | |
| 1. Personal Details\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |  | |
| \*If an agent is appointed, please complete only the Title, Name and Organisation  boxes below but complete the full contact details of the agent in 2. | | | | | | | | | | |  | |
| Title | | Mrs | | |  |  | | | | |
|  | | | | | |  | | | | |
| First Name | | Helen | | |  |  | | | | |
|  | | | | | |  | | | | |
| Last Name | | Marshall | | |  |  | | | | |
|  | | | | | |  | | | | |
| Job Title (where relevant) | | Director | | |  |  | | | | |
|  | | | | | |  | | | | |
| Organisation representing | | CPRE Oxfordshire | | |  |  | | | | |
| (where relevant) | | | | | |  | | | | |
| Address Line 1 | | 20 High Street | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 2 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 3 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Postal Town | | Watlington | | |  |  | | | | |
|  | | | | | |  | | | | |
| Post Code | | OX49 5PY | | |  |  | | | | |
|  | | | | | |  | | | | |
| Telephone Number | | 01491 612079 | | |  |  | | | | |
|  | | | | | |  | | | | |
| Email Address | | director@cpreoxon.org.uk | | |  |  | | | | |
| **Sharing your details**: please see page 3 | | | | | |  | | | | |

**Part B – Please use a separate sheet for each representation**

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

**STRAT 2**

4. Do you consider the Local Plan is: (*Please tick as appropriate)*

4. (1) Legally compliant Yes

4. (2) Sound **NO**

4. (3) Complies with the Duty to Cooperate **NO**

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| 5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments. |
| **STRAT 2 The Need for New Development in South Oxfordshire**  Oxfordshire Housing & Growth Deal  We learn from the Chancellor of Exchequer’s Budget announcement (rather than local consultation!) that the Council has now contracted with the Government to delivery of the Plan total, which even the District considers challenging and we consider unachievable as well as undesirable, two years ahead of the period of this plan, that is by 2031 rather than by 2033.  The [Oxfordshire Housing & Growth Deal Outline Agreement](https://www.oxford.gov.uk/downloads/file/4138/outline_agreement) states:  ‘25. This is the basis for the current suite of local plans across Oxfordshire which, when fully adopted, will provide development plan coverage to 2036. The joint statutory spatial plan will build on these local plans. The ambition to plan for and support the delivery of 100,000 new homes by 2031 **is recognised as significantly in excess of the Local Housing Need figures set out in the Government consultation paper ‘Planning for the right homes in the right places’ (DCLG September 2017)’**  (Our emphasis)  The significance of this is that it appears to seek to pre-empt the Inspector’s decision on the soundness of the Plan, and to thwart the public’s right for challenges to it to be heard and considered.  We trust that the Inspector will give no weight to the existence of this contract in considering the Plan.  Overall Need  The Government’s new proposal for calculating Objectively Assessed Need, following on work by our own MP, would give a need figure for the District 3,000 houses lower than the SHMA based total in the Plan. Although even the new calculation is fatally flawed (as it assumes that merely the arithmetic exercise of uplifting plan numbers will get builders to flood the market and bring house prices down, when all it will actually do is to ensure five year supply problems) its existence obviously makes the much higher SHMA totals unsound.  The Plan allocates land for the provision of 1500 houses over and above the overstated SHMA totals (table 5c). It is also by definition undeliverable, as it is inconceivable builders will build unneeded houses. It is argued a surplus is necessary in case the Inspector strikes out other provisions in the Plan (which is to accept that the Plan might be found unsound, of course) but the Plan does not identify which might be struck out. The planned surplus might be too much or too little. What is certain is that if the Plan goes ahead, too much land will have been intentionally allocated and be cherry picked by developers, whilst doing nothing for five year supply.  Taken together, deleting these two unsound inclusions would reduce the Plan total by 5,250. This would be not far short of enough, for example, to delete both Culham and Chalgrove from the Plan.  Appendix 8 illustrates graphically how completion rates would have to rise to achieve these exaggerated figures, rising from 600 to over 1,800 per year. There is no evidence presented here, or in any supporting documentation, that this increase can be physically achieved – particularly considering the lack of skilled (and unskilled) building workers and the availability of building materials. There is also no evidence presented that there are sufficient number of people with the financial resources to purchase these properties. The reality will be that the developers will only build at the rate that these properties can be sold – leaving the district with an even larger deficit in its housing delivery.  (Continue on page 4 /expand box if necessary) |

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| 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. |
| The Local Plan should be recalculated on the new OAN numbers to remove this further excess 3,000 houses (that is a total removal of 8,250 including the Oxford unmet need and the built-in surplus) and if necessary delayed a month or two to enable the District to take advantage of the new OAN regime in April.  (Continue on page 4 /expand box if necessary) |

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**Yes**, I wish to participate at the

oral examination

✓

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| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  CPRE represents the views of its members across the District, is well-informed on the issues and would very much wish to contribute to any related discussion. |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.* |

Signature: Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by South Oxfordshire District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

✓

I would like to be kept informed about the progress of the Local Plan

✓

I would like to be added to the database to receive general planning updates

Please do not contact me again

**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 contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

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