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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

**EMP1**

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 Yes

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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. |
| **EMP 1 - the amount and distribution of new B-class employment land**  The planned total Employment land is excessive.  The economic forecasts for the increase in employment land needed are based on the Oxfordshire Strategic Economic Plan (SEP) and Strategic Housing Market Assessment (SHMA). The forecasts were made in 2012 (although the SEP was ‘refreshed’ in 2016 no change was made in the optimistic economic forecasts underlying it). A lot has changed since 2012 – including BREXIT and a continuation of slow economic growth of the UK economy (for example the UK economy will grow by less than 2% in 2017 – this is one third of the year on year economic growth envisaged in the SEP). There is no evidence presented here of the economic growth in south Oxfordshire in the last five years nor of the recent growth rates of Oxfordshire businesses. We therefore contend that the continuing reliance on out of date and unjustified figures to estimate the needs for employment land is unsound and unjustified.  According to a recent news report (<http://www.oxfordtimes.co.uk/news/15640404.WAGE_DROP__Why_you_could_be___6_000_worse_off_than_this_time_last_year/?ref=eb> ), Office of National Statistics figures show an increase of employment in the County of 10,000 part-time jobs and a decrease in 3,000 full time jobs. It is likely that the part-time jobs are in the retail sector (at, for example the Westgate Centre) and therefore should not need the Employment land envisaged here. There is no analysis here of the types of employment that have been created since the SEP/SHMA reports and what is likely in the next 15 years.  The South Oxfordshire Employment Land Review (ERL) identifies a need for 31.6 Ha of additional land by 2033 (para 6.11). This plan identifies an additional 37.2 Ha. No justification is made for this hike and, particularly, given that the original estimate of 31.6 ha is based on very optimistic growth figures we contend that this new figure is highly unsound.  South Oxfordshire has very low unemployment, a very high percentage of economically active people and an aging population (para 6.6). Therefore the economic growth planned for in this plan will rely heavily on immigration of workers into the District. There is no evidence presented here (or elsewhere) that this will happen and it is made even less likely with government policy designed to reduce immigration into the UK (coupled with the uncertainties surrounding BREXIT). The plan is clearly unsound and against national policy.  (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 Oxfordshire SEP and SHMA need to be substantially revised in the light of the recent economic slowdown and the impact of Brexit.  The Local Plan needs to provide evidence that the District can grow at a substantially faster rate than the UK. It needs to show that real growth in employment has been sustained in the last five years, and not just a growth in part-time work at the expense of full time jobs.  The report provides no evidence of the growth of new companies or activities in the District and no evidence that new businesses are planning to move to the district (if a substantial organisation was planning to establish itself in the next 15 years there should be some indication of this now) nor that any of the existing businesses are planning to expand. In summary evidence needs to be presented of real economic growth in the District over the last five years and into the future and it is on this evidence that additional employment land should be planned.  (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

✓

**No**, I do not wish to participate at the

oral examition

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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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