

The Rt Hon Robert Jenrick MP,
Secretary of State Housing, Communities
and Local Government
Ministry of Housing, Communities and
Local Government
2 Marsham Street
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Councillor Sue Cooper

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17 January 2020

Dear Mr Jenrick,

Thank you for your letter dated 7 January regarding your possible intervention around our Local Plan under sections 21, 27 and 27a of the Planning and Compulsory Purchase Act 2004. I would like to thank you for the opportunity to respond to your questions before you make your final decision on this matter, and I write on behalf of my Cabinet and our groups at South Oxfordshire District Council.

Since assuming control of the council in May 2019, the ruling Liberal Democrat and Green administration has given the emerging Local Plan 2034 (eLP2034) top priority. We have taken extensive advice from Officers and other relevant parties in order to ensure that our decisions are thoroughly researched and responsibly determined. My Cabinet remains committed to securing essential infrastructure funding from the Housing and Growth Deal and the Housing Infrastructure Fund (HIF). We are however frustrated that HIF funding is linked to eLP2034. High house-building rates in South Oxfordshire have already produced a desperate need for improved transport infrastructure.

Our Cabinet decision to recommend withdrawal of eLP2034 was made in the further context of the precarious financial situation that we have inherited. Significant underfunding and a failure by the previous Council administration to increase council tax in line with inflation, has left us with an escalating annual deficit. The additional cost of seeing eLP2034 through to adoption, on top of commencing a new plan immediately (required because I believe assumptions in eLP2034 are out-of-date and we will need to review the plan within 5 years) would be financially irresponsible. (It is worth noting that the additional council tax we receive from each new house built here does not even cover the cost of servicing it.) Cabinet's decision was further influenced by what we believe is a clear electoral mandate given to us by the residents of South Oxfordshire.

It is not the case that there is no local plan in place; the Core Strategy, adopted in 2012 provides planning policies until 2027. Against the Standard Method, we have a 9.75-year housing land supply (as at 31 March 2019) so in this respect we believe we have a strong defence against speculative development. In recent years, South

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Oxfordshire has delivered more new homes than many other districts and we are getting closer to delivering 40% Affordable Housing on major developments (33% last year).

The sustainability standards set out in the Core Strategy exceed those of eLP2034, but the impact by the Ministerial Statement by the Rt Hon Eric Pickles (March 2015) means we cannot rely on all of those. This combined with the need to address the climate emergency declared by our council was one of the primary reasons for our decision to recommend withdrawal of eLP2034. Furthermore, guidance from Government in terms of the 25y Environment Plan, the emerging Environment Bill and the change in the law to reach net carbon zero by 2050, require deep embedding of these issues into our local plan, in a way that they are not in eLP2034.

eLP2034 provides for a housing supply of 32,600 new homes, albeit with 28,500 planned for before 2034 – both far above the requirement of 22,800 homes. The excess supply added as ‘contingency’ against delivery would put much of our countryside under planning blight. The high annual delivery target, which includes the unmet housing need from Oxford City is so challenging that we are expected quickly to fall foul of the 5-Year Housing Land Supply, opening up the district to the risk of inappropriate speculative development.

Other concerns relate to the eLP2034 density and mix policies, which I believe do not alleviate the dearth of two and three bedroom homes and the over-supply of four and five bedroom homes in the district.

It is my group’s view that eLP2034 was rushed through to submission to meet the March 2019 deadline set by the Housing and Growth Deal without taking due consideration of the sustainability of certain strategic sites, of the unwarranted inclusion of many contentious Green Belt sites and of the special nature of South Oxfordshire and its Areas of Outstanding Natural Beauty. The importance of the Thames Valley and the Chiltern Hills as green lungs for Oxford, Reading and London cannot be over stated.

Representations from residents, Parish Councils and environmental groups, together with the overwhelming message received at the ballot box last May, are testament to the unpopularity of eLP2034. My Cabinet took early advice from Officers regarding the feasibility of making significant amendments to the plan during the Inspection process but were advised by the Inspectors themselves that this was not possible unless for soundness reasons. In fact, Officers’ advice was that the withdrawal of the plan and creation of a new, ambitious and environmentally responsible one was, in financial terms, potentially the least expensive option available.

I continue to seek a pragmatic way forward which results in the temporary direction being lifted and full planning powers regarding eLP2034 being restored to the district, avoiding a dangerous precedent and the undermining of local democracy. In order to discuss specific ways in which appropriate means could be found to modify the plan in response to our concerns regarding its soundness, I firmly believe that a face-to-face meeting with you is now essential. I note from Hansard for Tuesday evening that you have said that we should speak as soon as possible. Please can you confirm a date for a meeting with your office at your earliest convenience? We remain committed to working with you and MHCLG to deliver a Local Plan which

meets the needs of the residents of South Oxfordshire, supports jobs and prosperity in the local area and, crucially, recognizes the reality of the climate emergency.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink that reads "Susan Cooper". The signature is written in a cursive style with a small dot above the 'i' in Susan.

Councillor Sue Cooper