

Dear Economic and Social Scrutiny Committee member,

Last November, you kindly heard my presentation made on behalf of a number of community groups, CPRE & the Cotswolds Conservation Board (CCB) appealing for more effective and consistent reporting and analysis of housing need data. Since then, the CCB and Burford and Stonesfield residents groups have had constructive conversations with your officer Chris Hargraves regarding housing need data and the Local Plan policies.

Unfortunately, there has not yet been opportunity to develop the additional guidance we had started to see might be necessary, and two recent Appeals, one in and one outside of the AONB, have tried to exploit the inconsistencies to date by the authority in its reporting on housing need and the lack of clarity in the definition of "local need" in the WOLP.

The final day of the Stonesfield Appeal perhaps was the most illustrative and it seems a shame that the phrasing of your newly adopted policies have needed to be tested, and will in fact potentially be significantly defined (and not necessarily in a good way for the District and its communities) depending on this Appeal Inspector's decision. Specific observations of concern are:

- Previous and current WODC reports on levels of need, and the misquoting of Homeseeker Plus and need data, formed key pieces of evidence for the Appellant and solicited an apology at one point from WODC's own counsel for the "repeated" error in how housing need had been reported by the authority.
- The Appellant's expert witness took advantage of the lack of clarity about how local need should be defined and evidenced and found ways to challenge whether it is at subarea or settlement level even in the AONB. He disagreed that the definition of local need was consistent through the Local Plan document.
- There was a lot of push back from the Appellant about where the onus to provide local need evidence lay - with the developer or with WODC (particularly in light of published WODC and other Oxfordshire etc reports stating there was urgent need for housing etc, a SOCG that there was housing need in the area, and where previous WODC reports asserted there was a need for development at a particular location).
- The lack of application of paragraph 32 in WODC's Homeseeker Plus policy continues as a key issue. Bizarrely, despite the developer being happy to enable the affordable housing to be offered with priority to people with local connection not only when first built but also when subsequently becoming available (and the local community being keen for this also), WODC apparently would not sign up to this as was "not its policy". As I have presented to you previously, para32 of the Homeseeker Plus policy patently *is* WODC policy (unless there is an identified committee decision that redacted that part of the Homeseeker policy when it was adopted). Also, it compromises your officer – at the Stonesfield Appeal he had to defend a planning policy decision on the basis that development had to be justified on local housing need in the AONB for a village settlement, whilst also arguing that WODC's affordable housing policy for the development had to be applied to meet district wide need.

It is fair to say that there is more than a great deal of frustration on the part of residents, community groups and other parties about how these issues, which we have previously presented to you and which could be addressed, are being used to the advantage of developers and in Appeals.

To be clear, this is not about any policy change but it is effectively a realisation of the consequence of the new adopted policies in the Local Plan, with an emerging awareness of what evidence and information is required for their effective administration.

Your officer is, I know, considering how best to provide additional guidance for officers, councillors, developers and communities (for neighbourhood planning) that could support consistency and the application of the Local Plan policies and reduce the opportunity for different interpretations to emerge in Appeal processes. We would support this approach. However I appreciate there are additional pressing matters also requiring attention and his time.

This submission is therefore to bring these problems and concerns back to your attention in the context of the recent Appeals and ask if you could continue to be alert as to how need, and local need, is being interpreted and presented at planning and other committees. We also ask if you could endorse action by your officers to review processes and put in place additional guidance and protocols such as are necessary to avoid the problems we have highlighted. It may be appropriate, as suggested by your officer, that we wait to see how the Inspector for the Stonesfield Appeal reports on the evidence that has been presented to him.

Thank you for your time on this submission. My apologies that I am unable to present this in person due to a clash with the Growth Board Scrutiny Panel meeting at which I am also presenting. I would however be more than happy to be contacted should further information or clarification be needed, either individually or by the committee.

Kind regards, Sue Haywood For and on behalf of Responsible Planning in Burford rpiburford@gmail.com