



**OXFORDSHIRE
COUNTY COUNCIL**

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Mr John Hoad
Strategic Director
Planning, Housing & Economy
Cherwell District Council

Sustainable Development
Oxfordshire County Council
Environment & Economy
Speedwell House
Speedwell Street
Oxford OX1 1NE

Tel: 01865 815700
Fax: 01865 815085

Martin Tugwell
Deputy Director (Growth & Infrastructure)

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My Ref: MJT/SPB Your ref:
Please ask for: **Martin Tugwell**

Direct line: 01865 815113
martin.tugwell@oxfordshire.gov.uk

Dear John

Draft Supplementary Planning Document: Planning Obligations

I understand that Howard and colleagues have been working with your team on providing the County service infrastructure input to the proposed draft SPD.

Notwithstanding this on-going working relationship – which I continue to value – I must draw to your attention a number of fundamental concerns that the County Council has in respect of the document as it currently stands.

The proposal not to seek any contribution from affordable housing toward the cost of wider infrastructure is deeply concerning. It ignores the fact that such development will inevitably create additional pressure on services provided by the County Council.

It is our policy that where development creates such pressure it should make a reasonable contribution towards the costs of providing services (including infrastructure). Any failure to seek a contribution from affordable housing in this context is likely to result in a shortfall in funding for essential services provided by the County Council and upon which the development proposal may be reliant.

I have to make it clear that the County Council cannot guarantee to meet any shortfall in funding arising from the failure to secure a reasonable contribution towards demands arising from new development. Our capital programme is under severe pressure and there simply isn't the capacity to pick up the shortfalls brought about by the above stance.



INVESTOR IN PEOPLE

Secondly, the draft document infers (paragraph 3.4) that Cherwell District Council (as the Local Planning Authority) will normally expect to be the only local authority party to future legal agreements.

Such a position ignores the key role of the County Council (also a Local Planning Authority in terms of legal agreements) as a service and infrastructure provider. This, together with the seemingly more remote input of the County Council to the detailed negotiations and potential viability issues, raises a fundamental concern as to the extent to which future development proposals will realise their potential to be sustainable developments.

My third concern is one of timing. I understand that consultation on the SPD could take place in advance of consultation on the core strategy. Given that the raison d'être of the SPD is to secure contributions towards the infrastructure required in support of new development I question whether it is prudent or indeed possible to consult on the SPD at this time.

My understanding is that consultation on the core strategy will take place later this calendar year. If that is indeed the case I would strongly urge you to run the two consultations in parallel.

The slight delay that this would incur (in terms of the SPD consultation) gives us the opportunity to discuss on how we might use our shared commitment to respond to the changes in the planning system to improve our ability to secure contributions towards service and infrastructure provision.

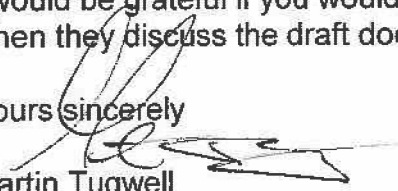
Such an approach would have the added benefit of enabling me to ensure that are able to reflect the outcome of our recent consultation on Local Transport Plan 3 into our discussions.

In this regard I think your work on infrastructure will stand us in good stead in order to respond to what is a rapidly changing context. In particular I think we would be well placed to react positively to initiatives from the Government to seek potential pilots for the development of the Community Infrastructure Levy.

I note what is said in paragraph 2.2 of the SPD about the standard charges of the kind proposed being applied as a unified and non-negotiable levy. However, while the joint work on the draft SPD has taken us forward I believe that there remains considerable work to be done to ensure we have a robust basis and methodology on which to move towards the successful introduction of a levy.

I would be grateful if you would draw these concerns to the attention of your Executive when they discuss the draft document at their meeting on 10 January.

Yours sincerely


Martin Tugwell
Deputy Director (Growth and Infrastructure)

Copy to: Cllr Keith Mitchell
Ian Walker