



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.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*

*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

First Name

Last Name

Job Title (where relevant)

Organisation representing
(where relevant)

Address Line 1

Address Line 2

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

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

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

Yes

No

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.

FIRST REPRESENTATION

MAIN DOCUMENTS OUT OF DATE

The Local Plan is NOT SOUND because it is not based on robust evidence. That is because the documents on which the Local Plan is based are out of date and do not take into account the current and future economic and business climate and in particular the effect of Brexit on jobs, houses and infrastructure.

The main documents on which the Local Plan is based are all dated 2014 and are as follows:

1. Cambridge Econometrics Final Report for VOWHDC dated 28/2/14 ("Cambridge Report"),
2. SHMA ("Strategic Housing Market Assessment") by G L Hearn dated April 2014, and
3. The Oxfordshire Local Enterprises Partnership ("Oxlep") 2014 Strategic Economic Plan for Oxfordshire ("SEP14")

The earliest document, and the one containing the original research on which the other documents listed above rely, is the Cambridge Report and is over 3 ½ years old which is too old considering the extreme importance of the Local Plan to VOWH now and for many years.

In 2016, Oxlep issued a new report, designed to refresh SEP14, called Strategic Economic Plan for Oxfordshire 2016 ("SEP16"). One of the reasons for refreshing SEP14 was to warn of Brexit and its effect on the Oxfordshire economy. The Local Plan contains several references to SEP14 on which it is based but does not mention that it was refreshed by SEP16 which it ignores.

The following references in SEP16 explain the concerns about Brexit:

"There has been strong employment growth in Oxfordshire in the last few years, but sustaining that growth over the long term is a significant challenge, particularly given the uncertainties caused by the EU Referendum result" (Introduction).

"The implications of Brexit are currently unknown but could be significant for the Oxfordshire economy. We will monitor carefully the evolving situation regarding Brexit negotiations and their consequences and seek to take appropriate action as soon as decisions have been made. There are several specific aspects which we will need to keep under control" (p.74)...and these include finding alternative sources for existing EU funding for universities and for science research projects such as the European Space Agency at Harwell; immigration controls that may affect Oxfordshire firms' ability to recruit and retain the best talent; and future trading arrangements with the EU and other countries which are uncertain.

"We will seek clarity from the Government regarding the status of EU and other non-UK citizens working in the UK and the current and future barriers to attracting EU and other non-UK staff to the UK. Access to the best talent internationally is crucial to the success of the universities and big science facilities as well as to many of the firms in the country."(p.44)

Since the Science Vale is particularly involved with, and very dependent on, the EU in respect of funding and employment and since it is the Science Vale that will account for most of the jobs (and therefore housing) growth in VOWH namely around 15,850 (70%)of new jobs out of a total of 23,000 (Local Plan Pt 1 p 50), it is especially important to know the impact of Brexit on the Science Vale before the massive investment involved in the implementation of the Local Plan is committed.

Based on the above and with growing uncertainty as to the likely outcome of Brexit, we ask the Inspector:

- A. Not to approve the Local Plan;
- B. To recommend that following the conclusion of negotiations regarding Brexit:
 - (i) the VOWH SHMA be updated based on the new methodology in the White Paper when it is enacted, and then
 - (ii) the Local Plan be revised to reflect the new SHMA and to re-assess the building locations in the Local Plan.

(Continue on page 4 /expand box if necessary)

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

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

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Compiles with the Duty to Cooperate

Yes

☐

No

☐

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.

SECOND REPRESENTATION

INFRASTRUCTURE WILL NOT BE BUILT BY 2031

We do not consider the Local Plan is SOUND for the following reasons.
The VOWH Local Plan 2031 Part 2 Publicity Period Guidance Note dated October 2017 states as follows:

1. "Has the plan been positively prepared? The plan must have been positively prepared to demonstrate the associated critical infrastructure required", and
2. "Is the plan effective? The plan should be deliverable over its period (by 2031) based on effective joint working on cross-boundary strategic priorities, such as unmet housing need and strategic road and rail networks".

The plan fails on both counts because:

- A. No arrangements have been made to have the infrastructure works required by the plan to be carried out by 2031, nor
- B. To arrange for them to be funded in full by that date, and
- C. Some infrastructure funding will never be found and therefore some of the proposed infrastructure will never be carried out.

To support A above: page 19 of the plan refers to “a Memorandum of Understanding with South Oxfordshire District Council and Oxfordshire District Council to agree and(approve the)delivery strategic highway infrastructure across the Science Vale Area” but no such agreement has been put in place for the infrastructure to be built by 2031.

To support B above: page 19 of the plan also refers to “working in partnership with other Oxfordshire authorities to plan for strategic infrastructure delivery across Oxfordshire as a whole” and there is a footnote referring to the Oxford Growth Board. The OGB website referred to contains the minutes of one of their meetings on 26/9/17 which states as follows “ the purpose of the Oxfordshire Infrastructure Strategy is (firstly) to set out the infrastructure investment needed to support jobs and housing growth in Oxfordshire and to shape investment strategies and to plan for infrastructure up to 2040 and one of its purposes is to deliver different types of strategy and help Oxfordshire in funding discussions with the Government.” In other words the plan is for the infrastructure to be carried out and funded **in the period up to 2040, not 2031.**

To support C above: the above minutes dated 26/9/17 also state that as of then (ie 52 days ago) the 2016 to 2040 infrastructure costs will be £8.35 billion of which ONLY £1.21 billion is secured. “The funding gap will reduce but will still be considerable”. In other words, firstly, the infrastructure will not be completed in full because the funding gap will be considerable and, secondly, it will not be completed by 2031 because the objective is to complete it by 2040, 9 years later.

The plan does not therefore meet the soundness tests set out in 1 and 2 above in the Guidance Note.

We therefore ask the Inspector :

- A. Not to approve the Local Plan;
- B. To recommend that following the conclusion of negotiations regarding Brexit:
 - (i) the VOWH SHMA be updated based on the new methodology in the White Paper when it is enacted, and then
 - (ii) the Local Plan be revised to reflect the new SHMA and to re-assess the building locations in the Local Plan.

(Continue on page 4 /expand box if necessary)

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.

(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?

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No, I do not wish to participate at the

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Yes, I wish to participate at the

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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:

Paul Gibbs

Date:

18/11/2017

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 Vale of White Horse 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

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

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Please do not contact me again

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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@whitehorsedc.gov.uk

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