Comment

Consultee	Councillor Dudley Hoddinott (730195)
Email Address	███████████████
Company / Organisation	Vale of White Horse District Council
Address	17 Clover Close Cumnor Hill Oxford OX2 9JH
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Vale of White Horse District Council (Councillor Dudley Hoddinott)
Comment ID	LPPub729
Response Date	17/12/14 20:13
Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
Submission Type	Web
Version	0.2
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

The SHMA does not set housing targets.   It provides an assessment of the future need for housing.   But the Vale Council has chosen to adopt the SHMA number unmodified, as the Vale's housing target.   The target construction figure looks grossly inflated when set against the number of homes a year actually completed in the three years 2011-2014.   The target figure is about 3 times the recent build rate.   The programme is over-optimistic, although developers will secure the newly identified

development sites with planning consent for construction, but they will not complete the houses if they cannot build them or find purchasers for them.   A local development has been delayed as it took 30 weeks to obtain the bricks.   This wait will increase if planned construction rates increase significantly.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

Take the SHMA economic forecasts as a starting point, but then take account of how much construction can be sustainably accommodated, and the social and environmental impacts of increasing the number of dwellings in the district by over 40% by 2031. Also, remove the four sites in the Oxford Green Belt totalling 1,510 dwellings from the SHMA forecast. These sites are in North Abingdon, North West Abingdon, North West Radley and South Kennington. This would reduce the Vale?s housing requirement from 20,560 to 19,050.

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.

Q6 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

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The SHMA numbers were supposed to be guidance, but the Vale has not tested the accuracy of the SHMA. I feel this is very important.