

Comment

Consultee	Dr Susan Nodder (723546)
Email Address	[REDACTED]
Company / Organisation	Watchfield Parish Council
Address	11 Oxford Square Watchfield SN6 8TB
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Watchfield Parish Council (Dr Susan Nodder)
Comment ID	LPPub2710
Response Date	20/01/15 15:42
Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
Submission Type	Email
Version	0.5
Q1 Do you consider the Local Plan is Legally Compliant?	No
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.

Housing numbers and SHMA - these are being heavily influenced by economic plans for the county, which are produced by the Local Enterprise Partnership, a non-elected body and chaired by the Public Sector. To date, there has been no open public consultation on these plans or independent scrutiny and there is an assumption that created jobs will be taken by residents of the Vale whereas, in reality, they will probably result in more people being drawn from outside the Vale causing an exacerbation of housing need and environmental impact of commuting. Where is the evidence that building targets are satisfying a demand rather than creating one? The Local Plan states that the SHMA has been

produced with other Oxfordshire authorities but there is no reference to the proportion of Oxfordshire-wide housing requirement allocated to the Vale in comparison to, say, South Oxfordshire. The duty to co-operate is not a duty to accept. The 40% increase in the housing numbers to be built up to 2031 will be disastrous for the rural nature of the Vale and heritage sites. The Local Plan is based on exceptionally high forecasts of need from the controversial SHMA, which has been much criticised by the public, organisations (such as CPRE) and politicians. In an independent critique of the SHMA, commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two. The implications of the SHMA have not been balanced against the environmental and social aims as set out in the NPPF. The recent Select Committee Report into the Operation of the NPPF stressed that all strands must be equally sustainable in order for development to be allowed. There is, also, no reference to a Windfall Policy or any maximum numbers attached to windfall sites. Without a clear policy, and whilst the Vale continues to fail to address the 5 year land supply shortage, windfall sites could attract developments greater than those allocated as strategic sites making *planned development* unachievable.

The SHMA itself says it is just a starting point and only part of the evidence base for determining housing numbers and that further work should be done to test whether such numbers can be accommodated sustainably before adopting it as a housing target.

The Vale of White Horse District Council did not attempt any further work to verify these figures and adopted the SHMA unquestioningly. They should have first robustly assessed them against social, environmental and infrastructure considerations. The Local Plan, therefore, cannot be considered to be effective or sound.

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.

This version of the Local Plan still appears developer-led and, if implemented, will adversely affect existing and future residents of the Vale. We ask that these concerns are fully addressed before proceeding.

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:

Watchfield Parish Council, would like the opportunity to participate, directly or via a WVV representative, at the oral examination of the Local Plan and/or to present further and more detailed evidence in support of some or all of the representations set out. We also wish oral evidence, and any further written evidence which may be required of him by the inspector, to be presented by our road transport consultant Bob Hindhaugh and/or his associate Simon Boone.