

In my view, Vale's Local Plan 2031 Part 2 is not sound. I would like to be included in the Examination in Public.

1. The primary purpose of the LPP2 plan is to allocate sites to meet Oxford's unmet need.
2. Oxford's Local Plan is in an earlier stage than Vale's is, and is based on the old SHMA housing targets. The government decided this old methodology was poor and that it resulted in wrong (as in, too high) numbers, so are consulting on a new algorithm, which will probably be implemented within a few months.
3. Government's recommendations to local authorities about whether they should continue with their old, unrealistic SHMA targets depends on where in the process they are. The cut-off is arbitrary and I saw no evidence supporting their cut-off dates.
4. Oxford's Local Plan is as yet unadopted, so they have no adopted housing targets. When the new calculation methodologies come into effect, Oxford is likely to re-calculate and come up with housing targets something like half of what's in their draft Local Plan. It's likely Oxford's unmet need figure will drop dramatically.
5. Therefore, the portion of Oxford's unmet need that is Vale's responsibility to provide will fall significantly. It may well be that the sites in Part 1 are adequate. We should wait to see.
6. If Oxford includes any 'ambitious' growth figures in their housing targets (as Vale has), it surely cannot be the responsibility of neighbouring districts to help them meet this inflated figure. A figure based on true and evidenced need is one thing. Supporting ambitious growth targets in Oxford is Oxford's responsibility, not Vale's. (I use the word 'ambitious' as this is the term used in the government white paper on the subject of housing targets.)
7. So Vale's LPP2, which allocates sites to meet Oxford's unmet need, is not based on evidence, because Oxford have not finally determined their housing need. And it's based on a poor guess, because Oxford's unmet need is very likely to be significantly reduced.
8. In fact, because Vale's Local Plan Part 1 provided so many new houses, it could reasonably be argued that LPP1 alone was adequate to meet Oxford's unmet need.
9. And further, LPP1 took land out of the Green Belt for housing development, which now appears to have not been needed. In retrospect, Local Plan Part 1 was also unjustified. But it's too late to fix that.

It's widely recognised and accepted that there are two serious obstacles to economic growth in Vale:

- 1) our main roads frequently are over capacity, resulting in gridlock. This isn't just my opinion. It's officially true.
- 2) Our houses are unaffordable. Companies decide not to relocate here, recruitment is difficult, and when people have to find housing further away so they can afford it, their commute adds to the highways congestion. It's an unsustainable situation.

To break that down:

- 1) We want people who work here to find places to live here. It doesn't serve our community to have market houses built that are intended for the London commuter market. Local people are priced out.

- 2) This Local Plan does nothing to address this problem of affordability. In fact, when I asked at Scrutiny Committee specifically what this LPP2 does to tackle these intractable problems, the Cabinet member admitted it did nothing.
- 3) In my opinion, it's irresponsible of Vale to put forward a Local Plan that fails to address our most severe planning problems. Therefore the plan is not effective at solving our housing problems.
- 4) Vale could have been bold and forward looking, adopting policies to ensure decent places to live for those who need them. Instead, Vale's proposing a plan calling for more (*many* more, maybe *unachievably* more) of the same.
- 5) When I say 'affordable', I mean decent and desirable houses that can be rented or purchased by workers on an average wage. This plan does nothing to address this need.