

## Comment

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Comment by	Cumnor Parish Council ( Philip Hawtin)
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**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

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

**Q3 Do you consider the Local Plan complies with the Duty to Co-operate?** No

**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.**

These comments refer to Core Policy 1 (Presumption in favour of sustainable development) and all others that flow from it, in particular, Core Policies 4, 8, 13, 15 & 20.

Unsoundness and unsustainability of Oxfordshire SHMA ? These policies are unsound. There can be no presumption of ?sustainable development? based on the exceptionally high forecasts of housing need proposed in the Oxfordshire Strategic Housing Market Assessment, which is itself unsound and unsustainable. The Local Plan policies are therefore unjustified and will be ineffective in achieving their desired outcomes. ? The Plan states that ?the housing target reflects the Objectively Assessed Need for the Vale of White Horse District as identified by the up-to-date Strategic Housing Market Assessment (SHMA) for Oxfordshire. The SHMA sets out how many new homes are required across Oxfordshire and for each district up to 2031.? This statement is invalid: the SHMA figures are inflated and unsustainable, and do not in any way constitute an objective assessment of the housing needs of the Vale. ? I agree with the arguments presented by CPRE showing why the SHMA figures should properly be regarded as inflated and unsustainable. ? The SHMA relies on the Oxfordshire Strategic Economic Plan (SEP), to provide the economic base line and the associated adjustment for planned jobs growth on which its predictions are based. The SEP has not been subject to public consultation or any independent scrutiny, and is therefore not an appropriate basis on which to make policy decisions. ? I understand that in a recent assessment of a SHMA in relation to a case in Leicestershire, Inspector Jonathan King questioned the adoption of ?aspirational employment growth? figures put forward by the Local Enterprise Partnership and stated ?how essential it is that evidence such as SHMAs must be rigorously tested in order to establish that it is robust?. The figures used for the Oxfordshire SHMA have not been subjected to any such a test.

SHMA failure to meet the sustainability requirements of the NPPF ? It is essential that plans are realistic but the Plan neither justifies the figures used nor explains how any shortfall would be ameliorated. ? I support the CPRE?s conclusion that the Oxfordshire SHMA is utterly disproportionate and unrealistic. ? The NPPF requires the economic, social and environmental aims to be pursued ?jointly and simultaneously?. ? The SHMA is heavily influenced by the Oxfordshire SEP. Because this has not been subject to any public consultation, the growth targets have been effectively excluded from the local planning process, and there has been no opportunity to assess the economic, social and environmental aims. ? The risk of serious harm from over-allocation is great. Builders? preferences for greenfield land will lead to a more dispersed pattern of development, will put inappropriate pressure on rural Oxfordshire and will fail to encourage urban investment and regeneration. This will be damaging to Oxfordshire as an attractive business location and as a place to live. In particular, the damage to areas such as Cumnor will be irreversible ? The emphasis on new build means that the vast majority of new households cannot afford to buy or rent new houses at market prices. More thought should be given to changing current housing market and industry structures to provide genuine solutions to those in need of affordable housing.

**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.**

The SHMA figures should only be taken into account, alongside the figures derived from published government household projections thereby using the most probable values for all input parameters rather than extreme figures.

**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?**

No - I do not wish to participate at the oral examination