

Comment

Consultee	Mr Frank Dumbleton (805299)
Email Address	
Address	1 Lavender Cottages Main Street Didcot OX11 0RZ
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Frank Dumbleton
Comment ID	LPPub2491
Response Date	18/12/14 22:38
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?	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.	East Harwell Campus (Harwell and Chilton Parishes)
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.	

The validity of the Strategic Housing Market Assessment has also been questioned by many organisations, including the VWHDC's own Scrutiny Committee. Despite this, VWHDC has not tested the soundness of the SHMA figures.

It now emerges that a Select Committee inquiry by the Communities and Local Government Committee of the UK Parliament, examining the working of the National Planning Policy Framework, has identified shortcomings in the methodology of compiling SHMAs.

The committee's report, published on 9 December 2014, states: "We are concerned about the widespread unease surrounding the results of SHMAs. Communities need to have confidence that the figures on which their local plans are based are accurate."

It goes on to recommend:

"We recommend that the Government work with local government and the house building industry to revise its guidance on strategic housing market assessments and produce an agreed methodology. Inspectors should then be required to test SHMAs against this methodology."

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 allocation of 850 houses on the Harwell East Campus site should be removed from the Local Plan.

If the 850 houses are still considered necessary after re-examination of the SHMA, they should be allocated to Valley Park, which has already been assessed as having additional capacity for up to a further 1,600 dwellings.

The accuracy of the SHMA figures should be tested by the Inspector, as recommended by Select Committee of the Communities and Local Government Committee.

***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 proposed allocation of 850 houses in a nationally protected landscape is unprecedented, and I wish to back up my written representation by participating at the examination.

The recent publication of the report by the Select Committee of the Communities and Local Government Committee has added a new obligation on the Inspector to test the SHMA figures. I wish to participate at the examination to ensure this happens.