

Comment

Consultee	Mr Andrew Fautley (872778)
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Address	22 The Park Didcot OX11 0HB
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Andrew Fautley
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Response Date	19/12/14 14:01
Consultation Point	Core Policy 5: Housing Supply Ring-Fence (View)
Status	Submitted
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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

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? Yes

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.

Core Policy 4 for meeting housing needs and Core Policy 5 that flows from it are based on the Strategic Housing Market Assessment for Oxfordshire (SHMA). The SHMA has been criticised by many people, but particularly by the CPRE based on a report commissioned by them from Professor Alan

Wenban-Smith. The detailed issues are very technical in a way that is beyond ordinary members of the public, but there appear to be serious grounds for questioning the figures, especially when they have led to such a large increase in the prediction of the number of houses required, seemingly driven by a large increase in the predicted number of new jobs in the area. Until these criticisms have been objectively assessed the policy must be considered unsound. Certainly some of the numbers from the SHMA seem to be unrealistic.

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.

To make Core Policies 4 and 5 sound they must have a housing needs basis that has been more critically examined than the SHMA, and has addressed the criticisms of the CPRE report. The numbers and sites from the 2013 draft Local Plan should replace those in this version. Even if higher numbers are confirmed as the most reliable forecast, there should still be a mechanism for adjusting the plans should reality not match up to the forecast, or if infrastructure to cope with the large increase in housing cannot be delivered.

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

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:

I am willing for my concerns to be represented by the Keep Harwell Rural Campaign.