

Comment

Consultee	Mr Oliver Gardiner (756473)
Email Address	
Address	White Cottage, High Street Harwell Didcot OX11 0EX
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Oliver Gardiner
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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.

The plan is based on an exceptionally high forecast of housing needs as defined in the Oxfordshire SHMA and supporting evidence. The SHMA has been the subject of many challenges and can hardly be considered to represent any sort of consensus.

The SHMA is based on a number of questionable assumptions to which it is very sensitive - this adds up to a total employment forecast that lacks any credibility because other outcomes for employment in the vale may be equally or more likely but with dramatically different impacts on housing need. Despite the SHMA being a statement of need and not a target, the Vale have accepted this number as a target without any proper scrutiny or challenge despite the obvious weaknesses for which it has been widely criticised.

More evidence is provided in the critique commissioned by CPRE Oxfordshire from a leading planning expert who concluded that the SHMA's estimate is likely to be " **grossly overstated** " by a factor of over 2.

- 1 The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable;
- 2 The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire; and
- 3 Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and house building rates and it has not been subject to public consultation or independent scrutiny.

The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. The Vale did not attempt to undertake any further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.

By the time the Vale plan is inspected, the Cherwell plan will have been reviewed, and Oxfordshire SHMA accepted as an appropriate statement of need and hence setting the district housing target, or it will have been rejected.

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.

If the Oxfordshire SHMA is rejected by the Cherwell inspector, then the Vale should withdraw its plan and modify it line with the Cherwell inspector comments.

The SHMA should be reviewed and a revised statement of needs derived, based on Government's official household projections and more credible and realistic employment projections.

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