

Comment

Consultee	Dr James Vincent (872363)
Email Address	
Address	5 Horsa Lane Chilton Didcot OX11 0UE
Event Name	Vale of White Horse Local Plan 2031 Part One - P
Comment by	Dr James Vincent
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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 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, please also use this box to set out your comments.

Paragraph 4.24 states that "It is anticipated that this will deliver approximately 23,000 jobs between 2011 and 2031"

The VWHDC appears to have accepted these job figures without any scrutiny.

A recent planning application for 200 homes in Leicestershire in which the planning Inspector Jonathan G King said "little or no reliance? on the local SHMA (produced by GL Hearn) and was unable to give it "Significant weight in the application?". (SOURCE: <http://majorapps.planningportal.gov.uk/wp-content/uploads/documents/2425527/S62A-2014-0001%20-%20Statement%20of%20Evidence.pdf>)

). The Inspector also noted that SHMAs should not take into account the 'aspirational employment growth of the Local Partnership (LEP)' (Paragraph 26).

Further to this, the Oxfordshire Innovation Engine, Realising the Growth Potential, October 2013 (http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf), paragraph 6.10 states that 'road congestion is a major constraint on growth, and 23% of those responding to our survey identified it as a constraint on growth, and most of those interviewed expressed particular concern in relation to the A34'.

It would therefore seem irresponsible and premature to allocate unprecedented large strategic housing sites on green land within the legally protected landscape of the North Wessex Downs AONB, particularly if the predicted growth is not realised.

As such, the plan is unsound.

Summary: The numbers of new jobs expected at the Harwell Oxford Campus are aspirational so that they are an unsound basis to make a case for placing a large number of houses on a prominent region of the North Wessex AONB.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound in relation to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the test is incapable of modification at examination). You will need to say why this modification will make the Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as specific as possible.

In order to make the Local Plan sound, and protect the North Wessex Downs AONB, the following modifications are suggested:

- 1 Remove the entire allocation of 850 homes from the Harwell East Campus.
 - 2 Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number to 400 including the 125 already given outline permission)).
 - 3 Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission) provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
 - 4 Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West Harwell Campus (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example:
 - 1 (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 houses), or
 - 2 (b) Didcot A (capacity for 425 houses), or
 - 3 (c) Land West of Steventon (capacity for 350 houses), or
 - 4 (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity across the district.
 - 1 Or reduce the total SHMA allocation for the District by 1000
- Remove the North Wessex Downs AONB entirely from the Science Vale 'Ringfence' in order to protect it from future development should the Science Vale fall behind in delivery of its housing targets.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to make 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 raised 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.