

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Cllr Tony de Vere
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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.**

These comments are referenced to Chapter 1- Introduction and  
Core Policy 4 - Meeting our Housing Needs. ? as Not Sound and Not sustainable.

This response wishes to direct the Inspector towards the fundamental basis on which the Local Plan is derived, specifically:

- 1) to establishing the required housing for the Vale of White Horse from the examination undertaken in the Oxfordshire Strategic Housing Market Assessment (SHMA) and the **two reference documents** - Oxfordshire Economic Forecasting Final Report 2014, produced by Cambridge Econometrics; and the 2014 SVUK Housing and Employment Study by G.L. Hearn, and
- 2) to the numbers of houses to be built over the 20 year period, which in the case of Vale of White Horse follow directly from the analysis of economic growth in the Vale, and
- 3) therefore at the economic growth forecast for the Science Vale area.

I wish to submit that there has been inadequate challenge to these predictions and insufficient data to justify the numbers. I also wish to draw the Inspectors attention to the Infrastructure Delivery Plan, which quotes sources of Government funding administered by the Oxfordshire Local Enterprise Partnership (OxLEP).

There has been no obvious commitment from the OxLEP to this input nor to underwriting, in principle, the ability of the OxLEP to support the infrastructure needed for the projected four fold increase in house building.

If this Local Plan is to be sustainable and deliverable I question these assumptions.

### **The Oxfordshire Strategic Housing Market Assessment**

The Oxfordshire SHMA is the fundamental basis for deriving the housing target of 20,560 houses. The Local Plan does little to defend its acceptance and I have been reminded by the Council Officers that I am in no position to challenge the SHMA. Quote:

*Given the emphasis in the NPPF on meeting housing need in full, setting a lower target would dramatically increase the risk of failure at local plan examination, or early suspension of the examination process, and with reference specifically to the suspension of the Cherwell local plan examination ?This is to enable the Council to put forward proposed modifications to the plan involving increased new housing delivery over the plan **period to meet the full, up to date, objectively assessed, needs of the district as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment 2014(SHMA)?***

Whilst I take very serious note of the Inspector's comments about the Cherwell DC Local Plan suspension I believe it perfectly correct to challenge the basis of the SHMA in deriving the OAN whilst still acknowledging the 'approved' methodology. I have repeatedly asked for the OAN to be objectively scrutinized by the Council but on a number of occasions informed that we have to take what the two reference documents forecast. In fact the Council Planning Officers and Cabinet admitted to the Scrutiny Committee in September 2014 that *'the Council does not have substantial and robust evidence to challenge the SHMA.'* Ref Minute Sc160. I submit that the lack of proper challenge to the SHMA makes the Draft Local plan unsound.

In writing this submission I would point out that that as a VOWH District Councillor I was involved in the Executive administration up until 2011. I was closely involved in establishing the Science Vale UK partnership. Prior to becoming a Councillor in 1999, I also worked as a professional engineer in both

the public and private arms of many of the research activities referred to in the documents referenced above, in some cases starting up businesses in the markets closely related to those quoted in the two reference documents.

Whilst I have no inside track on the business plans for the Harwell, Milton Park and Culham Lab sites I would question the growth assumption, made in the R&D sectors, that contribute the majority of the uplift in the Vale of White Horse ?above trend growth?.

I would also question the distribution of the housing across the Science Vale area with many employees working at least 10 miles and further to the Harwell, Milton Park and Culham job centres in the SVUK area. Little account has been taken of that in the SVUK Housing and Employment Study and where most of the discussion centers on job potential, not real business growth

**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.**

Whilst I accept that this is a long term Local Plan and projections are very difficult I would submit that the economic growth is over-optimistic and the OAN of 20,560 needs more careful consideration. I would submit that a more staged approach to the OAN is needed to align with the Economic growth achieved and projected from short to medium term considerations. For example a lower OAN, based on 18,000 new jobs could be set with the opportunity to revise after 5/10 years into the plan.

**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:**

I believe that I can inform the public inquiry of the concerns raised above