

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Radley College & Kibswell Homes Radley College & Kibswell Homes
Comment ID	LPPub3743
Response Date	19/12/14 13:11
Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
Submission Type	Email
Version	0.3
Files	741289 LPPub.pdf
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)	Yes
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.

Is the plan positively prepared?

2.4.6 For a Plan to be positively prepared, it must be based on a strategy which seeks to address objectively assessed development and infrastructure requirements including any backlog of units from the previous Plan period as well as unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The SHMA Summary Report acknowledges at paragraph 4.18, with reference to the (then draft) PPG that the starting point for identifying housing need is the latest set of official household projections; it goes on to explain at paragraph 4.11 that the SHMA has taken account of the latest information, considered population dynamics and rates of household formation in detail and used this to develop longer term population projections. Following on from this, it notes at paragraph 4.12, that the projected rates of household formation do not account for the actual past shortfall in housing delivery ? the delivery of new homes in the District fell 801 homes short of the housing targets for the District over the 2006-11 period, and that the Council would be expected to ?make good? this past housing shortfall.

2.4.7 The NPPF states in its Foreword that sustainable development is about ?positive growth - making economic, environmental and social progress for this and future generations.? The document is clear throughout that LPAs need to adopt a positive approach to planning: at paragraph 14 it emphasises that local planning authorities should ??positively seek opportunities to meet the development needs of their area,?; under Core Planning Principles at paragraph 17 that planning should be ??genuinely planned?. setting out a positive vision for the future? ; at paragraph 21, LPAs should ??set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth? ; at paragraph 28, LPAs are advised to take a ?positive approach? to sustainable new development; and at 182, that overall, Plans should be ?positively prepared?.

2.4.8 On the basis of evidence available the Freeholder is of the view that Policy CP4 and the overarching approach adopted by the Council is based on an objective assessment of need that complies with the requirements of the Framework and PPG in determining need, and therefore it has been positively prepared. The Freeholder supports CP4 and consider it to be sound.

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