

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Hazel Oliver
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Q1 Do you consider the Local Plan is Legally Compliant?	No
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

**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.**

I wish to object to the draft Local Plan Part One 2031 on the basis that it is 'unsound'. Below I outline my reasons, and what must be done, if the VWHDC, and indeed Oxfordshire as a whole, is not to lose its character and identity.

The SHMA is unsound and unsustainable and should not be relied upon. The plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been much criticised by the public, organisations (such as

CPRE) and politicians alike. In an independent critique of the SHMA commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

From these criticisms I understand that:

- 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;
- The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire; and
- 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 housebuilding rates and it has not been subject to public consultation or independent scrutiny.

However, I am not aware of any response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration

The Vale District Council has failed to give proper consideration to the environmental and social constraints within the District:

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. As far as I understand, the Vale District Council did not attempt to undertake this further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.