

Comment

Consultee	Mr Stuart Lovegrove (868665)
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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Stuart Lovegrove
Comment ID	LPPub30
Response Date	30/11/14 15:20
Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
Submission Type	Web
Version	0.7
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.	East Harwell Campus (Harwell and Chilton Parishes)
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?	No

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.

Core Policy 4 & all others that stem from it, in particular, Core Policies 8, 13, 15 & 20:

- 1 **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 the Council for the Protection of Rural England) and politicians. In an independent assessment of the SHMA commissioned by the 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 believe:

- 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 misinterprets 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 housebuilding rates and it has not been subject to public consultation or independent scrutiny.

I am not aware of any response to these criticisms nor any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration.

2. 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.

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.

Review the SMHA and adjust figures accordingly.

Give proper consideration to the environmental and social constraints within the District.

Remove erroneous allocation of housing to green belt and AONB

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