

## Comment

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<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Greenlight Developments Greenlight Developments
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<b>Consultation Point</b>	Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Email
<b>Version</b>	0.7
<b>Files</b>	<a href="#">APPENDIX 1 (Greenlight Developments).pdf</a>
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	No
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	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?** 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.**

We are concerned by the nature in which this policy has been drafted. In particular the phrase that, Oxford City may not be able to accommodate the whole of its new housing requirement for the 2011 ? 2031 period within its administrative boundary. Whereas, in reality, we know for a fact from Oxford City Council itself through the representations it made to the emerging Cherwell Local Plan, which is currently going through its examination, that through the published SHMA demonstrates that a significant proportion of Oxford's objectively assessed housing needs will need to be met outside of the city boundary in neighbouring areas. This is demonstrated by the contents of the very recently published Oxford City SHLAA (December 2014), which confirms that there will still remain an unmet need of approximately 20,000 homes to be delivered beyond the City boundaries. This is a substantial number of additional houses, the equivalent of the Vale's own OAHN (2011 ? 2031). Oxford City's known situation clearly needs to be taken into account in the formulation of this Plan's strategy, which by the very way in which Core Policy 2 is worded has not been undertaken. As such a more wide-ranging review is required of the Vale of White Horse's ability to accommodate any unmet need from neighbouring areas (most notably Oxford City), which is likely to raise fundamental questions for the whole Plan strategy.

The NPPF is very clear on this point. Paragraph 179 states that "Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable Local Planning Authorities to work together to meet development requirements which cannot wholly be met within their own areas ? for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans."

The wording of Core Policy 2 places an unjustified reliance on a review. A proper application of the NPPF requires that a Plan not based upon an up-to-date objective assessment of need be rejected as unsound. An unsound plan cannot be made sound through a commitment to review it in the future, and it would be a perversion of the NPPF to adopt an unsound plan on the basis that it is better than no Plan at all.

**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.**

The emerging Local Plan does not adequately meet the full objectively assessed needs of the housing market area in which the District sits, most notably the unmet need of Oxford City.

Not only will the Plan likely be found unsound on this basis, but it is also unlikely to be able to discharge the Duty to Cooperate. A failure to discharge this duty means that the Plan cannot as a matter of law proceed further.

Further work clearly needs to be done, with all of the additional work outlined in Core Policy 2 needing to be undertaken prior to the Plan being submitted to the Secretary of State.

**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:**

The nature of our representations is strategic and has key implications.