

## Comment

<b>Consultee</b>	Mr Timothy Howse (872735)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Adnams Farmhouse High Street Harwell OX11 0ER
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Mr Timothy Howse
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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.** West of Harwell

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.**

The plan is based on exceptionally high forecast of housing need as defined in the controversial Oxfordshire SHMA and supporting evidence base.

The SHMA is based on a series of questionable assumptions which add up to a total employment forecast which lacks credibility. This employment forecast in turn drives the housing need forecast.

Despite being a statement of need, and not a target, the Vale has accepted this number without scrutiny or challenge.

More evidence is provided in the critique commissioned by CPRE Oxfordshire from a leading planning expert who concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

- 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 house building rates and it has not been subject to public consultation or independent scrutiny.

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. The Vale did not attempt to undertake any further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.

By the time the Vale plan is inspected, the Cherwell plan will have been reviewed, and Oxfordshire SHMA accepted as an appropriate statement of need and hence setting the district housing target, or it will have been rejected.

**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.**

If the Oxfordshire SHMA is rejected by the Cherwell inspector, then the Vale should withdraw its plan and modify it line with the Cherwell inspector comments.

The SHMA should be reviewed and a revised statement of needs derived, based on Government's official household projections and more credible and realistic employment projections.

**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