

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - F
Comment by	Joel Dothie
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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. 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 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, please use this box to set out your comments.

Paragraph 4.18 states that the majority of the VWHDCs strategic housing growth is allocated in the South East Vale a proportion of that in the south east corner of the South East Vale. This is predominantly to support economic growth in the Science Vale.

Core Policy 4 details where in the South East Vale 10,320 dwellings are located, including 1,400 in the North West

One calculation for the total housing provision to support the Science Vale can be taken directly from the Vale's Local Plan. Page 41, Core Policy 5, states that the Vale of White Horse is ringfencing 11,850 homes to the Science Vale Area. Page 42 states that South Oxfordshire is allocating 6,300 homes to the Didcot area as per their 2012 Core Strategy. This means that

18,150 homes have already been committed to the Science Vale/Didcot area over the Vale of White Horse and South Oxfordshire districts.

South Oxfordshire District Council have been told to build a further 5,900 homes (2014). One option they are considering is to allocate 60% of the new additional housing target to the Didcot area to support the Science Vale, e.g. $60\% \times 5900 = 3540$ additional homes. B: http://www.southoxon.gov.uk/sites/default/files/2014-06-05_SODC%20LP2031%20ISSUES%20&%20OPTIONS%20.pdf
<http://www.southoxon.gov.uk/sites/default/files/Submission%20Core%20Strategy%20Strike%20through%20version%202.0.pdf>
Therefore, the total housing provision for the Science Vale may be as high as $18,150 + 3,540 = 21,690$ homes.

With the Science Vale ambitiously speculating to create up to 16,000 jobs, then it would appear that with up to more than 21,690 homes possibly being built in the general area, that there is more than an adequate provision of housing to support the projected economic growth.

As a direct result of this, it would seem reasonable to remove 1,000 of the 1,400 houses allocated to the North Wessex Downs and relocate them elsewhere, without it being detrimental to the economic growth plans of the Science Vale.

Furthermore, if South Oxfordshire have space to accommodate up to a further 3,540 houses in the Didcot area to support the Science Vale, then under the 'Duty-to-Cooperate' the Vale of White Horse should be looking to work with South Oxfordshire to ensure that they can remove the unprecedented housing allocation to the North Wessex Downs Area of Outstanding Natural Beauty and the housing to other strategic sites outside the AONB, thus complying with NPPF 116.

This strategy is given further weight by the following quotes from the appendices to the report by URS on the 'Strategy for the Vale of White Horse Local Plan 2031 Part 1: Appendices' which state that:

'A low growth approach at Harwell Oxford Campus would require development elsewhere across the district to meet the need for housing. On this basis it could be argued that a wider distribution of growth (and spending power) could be more beneficial in the long term, particularly those areas in the rural west of the district' (SOURCE: URS SA Report, Appendices, Appendix 14, SA3).
'There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities in the area. This has the potential to increase traffic on the A34 which is already known to be congested and operating at capacity in peak periods' (SOURCE: URS SA Report, Appendices, Appendix 14, SA3).

Hence, the headline strategy of allocating 10,320 dwellings to the 'Science Vale' area is misleading when in fact up to 21,690 houses are being proposed, built or have been allocated to the area in total, including around Didcot. As a result, housing provision in the Science Vale is significant.

Therefore, the decision to continue to use the Science Vale as a justification for large strategic housing sites in the South Oxfordshire area in particular to allocate an unprecedented 1,400 houses to mainly greenfield sites within the North Wessex Downs AONB is unsound.

The lack of clarity surrounding total housing provision to support the Science Vale across the Vale of White Horse and South Oxfordshire alone make the plan unsound.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound in light of 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 plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy as precise as possible.

Summary: The several recently constructed housing developments that have been omitted from Local Plan maps of the Vale of White Horse, together with houses already under construction both in the Vale and in South Oxfordshire serve to highlight the contribution to the perceived need for housing in the 'Science Vale' and result in an over-estimation of future housing need. To make the Local Plan sound and legally compliant, and protect the North Wessex Downs AONB, the following modifications are necessary: ? If the Vale of White Horse should work with South Oxfordshire's proposals to provide up to a further 3,540 homes in the Science Vale Area so that they can safely remove the unprecedented housing allocation to the legally protected land within the North Wessex Downs Area of Outstanding Natural Beauty.

? Remove the entire allocation of 850 homes from the Harwell East Campus. ? Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 including the 125 already given outline permission). Include provision of up to 400 new homes (including the 125 already given outline permission) at the North West Harwell Campus provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell East Campus. ? Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West Harwell Campus (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example: ? (a) Valley Park (which has been assessed as having additional capacity for up to a further 1,200 homes) ? (b) Didcot A (capacity for 425 houses) ? (c) West of Steventon (capacity for 350 houses), or ? (d) Distributed throughout the West Vale in order to encourage economic growth and prosperity more equally across the district. ? Or reduce the total SHMA allocation for the District by 1000 homes.

? Remove the North Wessex Downs AONB entirely from the Science Vale ?Ringfence? in order to protect it from full development should the Science Vale fall behind in delivery of its housing targets. Only by implementing these steps can the Plan be compliant with the NPPF paragraphs 115, 116 and the CROW Act 2000.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support 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 identified 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