



**Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies**  
Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	Mrs	
First Name	Julia	
Last Name	Evans	
Job Title (where relevant)	Clerk	
Organisation (where relevant)	East Challow Parish Council	
Address Line 1	Moorcroft	
Line 2	The Greenway	
Line 3	West Hendred	
Line 4	Oxon	
Post Code	OX12 8RG	
Telephone Number		
E-mail Address (where relevant)		

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

*Please mark as appropriate.*

5. 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.

Paragraph 4.10 says "The Local Plan 2031 Part 1 makes provision for 20,560 new homes to be delivered during the plan period (2011/12 to 2030/31; Core Policy 4). This reflects the Objectively Assessed Need for the Vale of White Horse District Council as identified by the up-to-date Strategic Housing Market Assessment (SHMA) for Oxfordshire."

The SHMA for Oxfordshire is unsound because it is based on a projection of the highest growth that might be possible, rather than what is expected. In reality job increases in the Vale will almost certainly not even closely approach the figure of 22,982 by 2031. This projection is based on figures that are at odds with the ONS job figures, overestimates the number of agricultural workers, does not take into account the loss of agricultural employment as a result of housing and solar farms encroaching on agricultural land and suggests that jobs will be created in the Science Vale where insufficient land is available for this growth outside of Milton Park and Harwell Site.

Even the recent CLG inquiry casts doubt on the accuracy of the figures used in the SHMA. Paragraph 70.states: "We are concerned about the widespread unease surrounding the results of SHMAs. Communities need to have confidence that the figures on which their local plans are based are accurate.

Our conclusion then, is that based on unsound SHMA figures in which we have no confidence, the local plan 2031 is also unsound.

6. 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 at 5 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 employment projection should be recalculated correctly since the evidence suggests that the current figure is nearly 20% too high. The local plan should be based on these revised figures.

**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.**

7. 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

☐

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8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:



Date:

18/12/14

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Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

4.1

Policy

4

Proposals Map

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Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

X

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As indicated earlier the local plan is unsound because the housing targets cannot be justified when based on exaggerated employment projections, but it will also be ineffective for the following reasons.

The maximum number of homes built in any year since 1993 was 570, yet the local plan demands 1650 homes per year – nearly trebling this rate for the next eight years. It is surely foolish, therefore, to assume that this can be achieved, especially in light of the fact that developers will only build houses if they can sell them, and that people will not buy houses if no school places are available, medical and leisure facilities full, and road systems are already completely choked. The plan cannot promise to solve these problems by simply building houses.

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Build rates need to be achievable, realistic and tightly coupled with infrastructure delivery, providing improved roads, transport, schools and other facilities when and where they are actually needed, and not several years afterwards if at all, depending on developer funding, which might not materialise if they stop building.

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[Redacted Signature]

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Consider paragraphs 4.4.0, 4.41 and 5.92 of the local plan alongside the NPPF which states “to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.” The plan sets out to define “infrastructure” and promises “studies” and “investigations” but doesn’t deliver it. Furthermore, there is no mention of funding or additional infrastructure planning for the Grove railway station. Additional homes in Wantage and Grove will significantly add to the congestion on the A417 as people drive to the science vale employment since bus services are not sufficient to provide a viable alternative. Highways have already stated that the A417 is close to capacity but there are no suggestions for improvements.

In the case of Water and drainage – the Vales Water Cycle study concludes that it cannot accommodate all proposed site allocations and also that waste water treatment facilities require significant upgrades. There is no planning for this.

There is insufficient infrastructure planning for social Infrastructure (education, health, community services and emergency services), and although there is mention of a secondary school at Grove airfield, no timing has been agreed, nor, apparently will the timing depend on, or be influenced by all the other developments nearby.

Green infrastructure – parks allotments, play areas and green space. The Local Plan paragraph 5.106 states: “The sub-area contains many areas important for their environmental or landscape value. These include the Letcombe Brook, a green corridor, which provides informal recreation, amenity and wildlife value and is an important flood management feature. Other land between East Challow and Wantage and Grove helps to preserve the separate and unique identities of these communities and so it is important these areas are protected from development.”

Despite this, planners have approved 290 homes in the gap between Wantage East Challow and Grove, and are considering more.

The plan, therefore cannot be effective unless more attention is given to timely infrastructure delivery. Appendix H – Monitoring and implementation framework – does not go far enough to achieve this.

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More agreement with and commitment from delivery partners is required; developers, water, rail, bus, police, fire, medical etc to deliver the necessary infrastructure in order to comply with the NPPF objectives to deliver sustainable development, economic, social and environmental gains jointly and simultaneously through the planning system.

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Name or Organisation :

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Paragraph

Policy

47

Proposals Map

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Yes

No

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Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

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The local plan and it's monitoring framework do not propose any means of ensuring that infrastructure is developed in line with homes to ensure the sustainability required by the NPPF, and there is no link between monitoring development and delivery of infrastructure. Furthermore the is no monitoring of the delivery of employment which underpins the need for housing in the first place.

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Appendix H, the monitoring and implementation framework needs to specify when and how targets will be achieved and should include monitoring of employment targets and infrastructure delivery as well as housing.



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