



**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

Dr

First Name

Robert

Last Name

Amess

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

21 The Park

Line 2

Cumnor

Line 3

Oxford

Line 4

Post Code

OX2 9QS

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

4

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

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

Yes

No

*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.

- The SHMA (Strategic Housing Market Assessment) estimate for housing needs in Oxfordshire has been misinterpreted by VWH
- The "Summary – Key Findings on Housing Need" document published in March 2014 relating

to the SHMA report contains the following statement:

*“The SHMA concludes that up to 93,560 – 106,560 additional homes are needed across Oxfordshire in the period 2011-2031 ”*

- This is clearly being misinterpreted as meaning “The SHMA concludes that **between** 93,560 – 106,560 additional homes are needed across Oxfordshire in the period 2011-2031”
- An estimate as accurate as “93,560 – 106,560” is unrealistic given the current and future economic uncertainty
- “93,560 – 106,560” is actually a range for the upper limit of the estimate and is, categorically, not the extent of the estimate as a whole
- The stated estimate does not contain a range for the lower limit of the estimate
- However, the words “up to” used in the statement imply that the range for the lower limit includes 0 (zero)
- The correct interpretation of the estimate is, therefore, as follows:

“The SHMA concludes that **between 0 and somewhere in the region of 93,560 – 106,560** additional homes are needed across Oxfordshire in the period 2011-2031”

- There has been too much, and unjustifiable, focus on the range for the upper limit of the estimate
- The above correct interpretation is substantially different to that which the VWH is using as justification for its plans
- Policy 4 is, therefore, unsound

(continue on a separate sheet/expand box if necessary)

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.


**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

☐

**Yes**, I wish to participate at the oral examination

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

**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.

Signature:

By email



Date:

19 December 2014