

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - P
Comment by	Dr James Vincent
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Consultation Point	Core Policy 5: Housing Supply Ring-Fence (View
Status	Submitted
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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?	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, please also 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

The Vale's Local Plan document, page 41, Core Policy 5, states that the Vale of White Horse is ring fencing 11,850 dwellings in the Science Vale Area. Page 75 further states that South Oxfordshire is allocating 6,300 homes to the Didcot area as p

Strategy. This means that $11,850 + 6,300 = 18,150$ homes have already been committed to the Science Vale/Didcot Vale of White Horse and South Oxfordshire districts.

South Oxfordshire District Council have been told to build a further 5,900 homes (2014). The consultation on where housing should go was held in June/July 2014. One option they are considering is to allocate 60% of the new additional housing to the Didcot area to support the Science Vale, e.g. $60\% * 5,900 = 3,540$ additional homes (Option B: http://www.southoxon.gov.uk/sites/default/files/2014-06-05_SODC%20LP2031%20ISSUES%20&%20OPTIONS%20, <http://www.southoxon.gov.uk/sites/default/files/Submission%20Core%20Strategy%20Strike%20through%20version%20>). Therefore, the total housing provision for the Science Vale, across South Oxfordshire and the Vale of White Horse 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 houses being built in the general area, that there is more than an adequate provision of housing to support the predicted 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 3,450 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 so that they can remove the unprecedented housing allocation to the North Wessex Downs Area of Outstanding Natural Beauty.

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. On this basis it could be argued that a wider distribution of growth (and spending power) could be more beneficial in rural areas more ? particularly those areas in the rural west of the district? (SOURCE: URS SA Report, Appendices 5 and 6), and

?There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities in the field. 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 strategic of allocating 10,320 dwellings to the ?Science Vale? area is misleading when in fact 18,150 houses are being built, have been allocated or proposed to the area in total, including around Didcot. As a result, housing provision within 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 Vale and in particular to allocate an unprecedented 1,400 houses to mainly greenfield sites within the North Wessex Downs is unsound.

Note there is uncertainty and contradiction in the Plan on housing numbers and this Alone makes the Plan unsound. The provision across the Vale of White Horse and South Oxfordshire to support the Science Vale has also not been made. Housing provision straddling boundaries is often not provided in documented evidence.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound 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 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.

The several recently constructed housing developments that have been omitted from Local Plan maps of Chilton and Harwell Oxford Campus, together with houses already under construction both in the Vale and in South Oxfordshire serve to make the Local Plan 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:

- 1 Remove the entire allocation of 850 homes from the Harwell East Campus.
- 2 Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of homes to 400 including the 125 already given outline permission)).
- 3 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 Oxford Campus.

- 4 Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example:
 - 1 (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200)
 - 2 (b) Didcot A (capacity for 425 houses), or
 - 3 (c) Land West of Steventon (capacity for 350 houses), or
 - 4 (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity across the district.
- 1 Or reduce the total SHMA allocation for the District by 1000
- 1 If the Vale of White Horse should work with South Oxfordshire's proposals to provide up to a further 3,450 homes in the Vale Area so that they can safely remove the unprecedented housing allocation to the legally protected lands of the Wessex Downs Area of Outstanding Natural Beauty.
- 1 Remove the North Wessex Downs AONB entirely from the Science Vale 'Ringfence' in order to protect it from development should the Science Vale fall behind in delivery of its housing targets.

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