



**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 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

Tony

Last Name

de Vere

Job Title

VOWHDC Councillor

(where relevant)

Organisation

(where relevant)

Address Line 1

52 Mill Road

Line 2

Abingdon

Line 3

OXON

Line 4

Post Code

OX14 5NZ

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

CP4

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.

These comments are referenced to Chapter 1- Introduction and Core Policy 4 - Meeting our Housing Needs. – as Not Sound and Not sustainable.

This response wishes to direct the Inspector towards the fundamental basis on which the Local Plan is derived, specifically:

- 1) to establishing the required housing for the Vale of White Horse from the examination undertaken in the Oxfordshire Strategic Housing Market Assessment (SHMA) and the **two reference documents** - Oxfordshire Economic Forecasting Final Report 2014, produced by Cambridge Econometrics; and the 2014 SVUK Housing and Employment Study by G.L. Hearn, and
- 2) to the numbers of houses to be built over the 20 year period, which in the case of Vale of White Horse follow directly from the analysis of economic growth in the Vale, and
- 3) therefore at the economic growth forecast for the Science Vale area.

I wish to submit that there has been inadequate challenge to these predictions and insufficient data to justify the numbers. I also wish to draw the Inspectors attention to the Infrastructure Delivery Plan, which quotes sources of Government funding administered by the Oxfordshire Local Enterprise Partnership (OxLEP).

There has been no obvious commitment from the OxLEP to this input nor to underwriting, in principle, the ability of the OxLEP to support the infrastructure needed for the projected four fold increase in house building.

If this Local Plan is to be sustainable and deliverable I question these assumptions.

The Oxfordshire Strategic Housing Market Assessment

The Oxfordshire SHMA is the fundamental basis for deriving the housing target of 20,560 houses. The Local Plan does little to defend its acceptance and I have been reminded by the Council Officers that I am in no position to challenge the SHMA. Quote:

*Given the emphasis in the NPPF on meeting housing need in full, setting a lower target would dramatically increase the risk of failure at local plan examination, or early suspension of the examination process, and with reference specifically to the suspension of the Cherwell local plan examination "This is to enable the Council to put forward proposed modifications to the plan involving increased new housing delivery over the plan **period to meet the full, up to date, objectively assessed, needs of the district as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment 2014(SHMA)**"*

Whilst I take very serious note of the Inspector's comments about the Cherwell DC Local Plan suspension I believe it perfectly correct to challenge the basis of the SHMA in deriving the OAN – whilst still acknowledging the 'approved' methodology. I have repeatedly asked for the OAN to be objectively scrutinized by the Council but on a number of occasions informed that we have to take what the two reference documents forecast. In fact the Council Planning Officers and Cabinet admitted to the Scrutiny Committee in September 2014 that *'the Council does not have substantial and robust evidence to challenge the SHMA.'* Ref Minute Sc160. I submit that the lack of proper challenge to the SHMA makes the Draft Local plan unsound.

In writing this submission I would point out that that as a VOWH District Councillor I was involved in the Executive administration up until 2011. I was closely involved in establishing the Science Vale UK partnership. Prior to becoming a Councillor in 1999, I also worked as a professional engineer in both the public and private arms of many of the research activities referred to in the documents referenced above, in some cases starting up businesses in the markets closely related to those quoted in the two reference documents.

Whilst I have no inside track on the business plans for the Harwell, Milton Park and Culham Lab sites I would question the growth assumption, made in the R&D sectors, that contribute the majority of the uplift in the Vale of White Horse 'above trend growth'.

I would also question the distribution of the housing across the Science Vale area with many employees working at least 10 miles and further to the Harwell, Milton Park and Culham job centres in the SVUK area. Little account has been taken of that in the SVUK Housing and Employment Study and where most of the discussion centers on job potential, not real business growth

Employment Projection in the Vale.

The two main areas for examination are the employment projections from the Enterprise Zone and Satellite Technology. Both these forecasts are dealt in the CE report on page 18 -21 with the following statements:

*The UK Science Vale **Enterprise Zone**, which includes 64ha at Harwell and 28ha at Milton Park, is expected to accommodate 8,400 jobs, of which 5,040 are net*

additional (source: bid submitted by Oxfordshire Local Enterprise Partnership to the Department for Communities and Local Government, pp 52- 53). If these are distributed proportionately to land, then 5,800 jobs would be at Harwell (net 3,500). At the same density, the whole Harwell site would accommodate nearly 9,000 jobs (5,400 net), in addition to the 4,500 already based there. Table 4.1 summarises the current and prospective employment situation on the Enterprise Zone and the rest of the Harwell site. We also assume that by 2031 Culham will accommodate 1,000 additional jobs, part of which is likely to be above trend.

And:

In total therefore, we estimate the increase in jobs above trend could be as follows:

5,400 (net) at Harwell and Milton Park, primarily in the EZ but also on other land at Harwell, including some relatively small scale above trend growth in the research facilities linked in particular to greater University of Oxford involvement there. These jobs should be classified to a mix of Other Professional Services, IT services, electronics and pharmaceuticals ☐

500 at Culham, in a mix of Other Professional Services, IT services, electronics, and pharmaceuticals. ☐ ☐

Both these statements are about the capacity of these sites to accommodate net additional jobs and new businesses. There is no further analysis to substantiate these forecasts.

In the Space Science/ Satellite technology forecasts are **2,500** above trend growth based on reference to Government BIS statement and select committee reviews and the following general statement:

The Government estimates that space science will grow from a £9bn industry now to one worth £40bn by 2031, generating 100,000 new jobs³. Harwell has a unique concentration of nationally significant research and commercialisation facilities in this sector, which will undoubtedly attract firms and jobs to the area. A reasonable assumption is that one tenth of the national growth in space science jobs by 2031 will be based in and around Harwell.

Frankly, these estimates are far too approximate – and given that most Space activity in the Earth Sciences area is closely tied to the European space Agency ‘national funding’ it would seem prudent to understand the UK Government’s commitment and what real slice of the ‘space industry’ these emerging businesses in the Vale and Oxfordshire can capture. The Science budget is no longer ring fenced!

The Local Enterprise Partnership needs to validate the basis of these numbers both from an historical performance and in respect of the future – bearing in mind that the majority of the funding for the existing activities at Harwell is heavily dependent on Public sector funding. There has been no detail to the growth forecasts of 1.5% over the plan period nor any explanation/evidence to support any of these numbers nor the substantial growth, ref figure 2, Ref SVUK Housing and Employment Study, which shows a Planned Economic Growth Rate in the Vale of 2% pa over the next 5 years. I believe the growth forecasts assumed make the Plan unsustainable.

Conclusion

The Objective Assessed Need of 20,560 new homes between 2011 and 2031 to meet the 23,000 new jobs is neither sustainable nor deliverable for the following reasons:

1. The above trend jobs growth of 10,200 new jobs in the Science Vale area alone is contributing towards an extremely ambitious economic growth rate – above 2%. Is this deliverable together with the required four-fold increase in housing completions by 2020?
2. The economic growth in the Science Vale area is heavily dependent on government funding – most from the Science budget. Does the Government forecast align with the current economic direction and the Treasury’s 5 year plan?

3. Much of this projected growth is aligned with European partnerships – ESA and Euratom to name just two. Are these agencies aligned to this growth in the UK's contribution?

Cllr Tony de Vere, Vale of White horse District Council.
Abbey Barton Ward, Abingdon
December 2014

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.

Whilst I accept that this is a long term Local Plan and projections are very difficult I would submit that the economic growth is over-optimistic and the OAN of 20,560 needs more careful consideration. I would submit that a more staged approach to the OAN is needed to align with the Economic growth achieved and projected from short to medium term considerations. For example a lower OAN, based on 18,000 new jobs could be set with the opportunity to revise after 5/10 years into the plan.

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:

I believe that I can inform the public inquiry of the concerns raised above

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:

[Redacted Signature]

Date:

16 Dec 2014

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

CP7

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

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

Yes

No

X

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

Yes

X

No

Please mark as appropriate.

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Infrastructure Delivery Plan

The further matter that needs closer scrutiny is the robustness of the VOWHDC Infrastructure Delivery Plan dated October 2014. Whilst the section 106 and CIL can be realistically expected to support some of the Housing growth infrastructure a substantial contribution will be administered by the Oxfordshire Local Enterprise Partnership (OxLEP), i.e. Government funding through Growth Places Fund, Local Sustainable Transport Fund etc. and through the Enterprise Zone Business Rates. I would encourage the Inspector to examine the robustness of this plan and the impact on the Local Plan if the identified funding and presumed Government commitments were to evaporate.

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

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Signature:

Date:

16 Dec 2014

