

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Strain
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Response Date	19/12/14 16:05
Consultation Point	Executive Summary (View)
Status	Submitted
Submission Type	Web
Version	0.1
Q1 Do you consider the Local Plan is Legally Compliant?	No
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

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 or its compliance with the duty to co-operate, please also use this box to set out your comments.

The SHMA assesses a potential NEED for 20,560 new homes but the draft Plan incorrectly refers to this figure as a TARGET. This is contrary to Government guidance which states that the SHMA must not apply any environmental or social constraints (eg lack of infrastructure, road congestion, Green Belt, AONB) when reaching the housing need assessment figure but that District Councils MUST apply these when considering how much development can be accommodated and where it should be located. The SHMA states District Councils will work together to refine and test what level of future housing development can be sustainably planned for across Oxfordshire. This part of the process appears to have been omitted and should have been done before concluding that sites for 7,430 homes were needed. The 20,050 figure needs to be adjusted to obtain a SUSTAINABLE HOUSING TARGET

having taken into account the very considerable environmental (Green belt and AONB) and social constraints within the Vale before seeking to find further sites to build on. It is not sound because it is not based on robust, credible evidence as the SHMA figure has been discredited, it is widely believed to be a massive overestimate and has not been independently reviewed and verified. It is not effective because it has no built in flexibility for if the forecasted economic growth and housing need fails to materialise over the plan period.

Q5 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 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 SHMA figure must be independently reviewed and verified. The District Council must apply the considerable environmental and social constraints within the Vale to the final SHMA figure arrived upon before deciding how much development can be accommodated and where it should be located to arrive at a Sustainable Housing Target. There needs to be provision written into the plan to provide for a review of the extra sites identified to meet the assessed housing need should the forecasted economic growth fail to occur over the plan period. There needs to be a mechanism for removing sites marked for development, during the plan period, without the need for a review of the plan as a whole with the costs and delays that would cause.

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.

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