Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dair and Vicki Farrar-Hockley
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Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
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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.

POLICY 4 & 5 MEETING HOUSING NEED, AND HOUSING SUPPLY RING FENCE.

Objection based on being unsound due to the forecast growth of homes and jobs being unrealistic, and hence contrary to Government policy that proposed allocated must have a realistic prospect of being

implemented, as set out in paragraph 22 of the National Planning Policy Framework (NPPF).

i) it fails to take sufficient account of housing demand near Didcot being met in the South Oxfordshire Core Strategy proposals for 6,300 new dwellings at Didcot in its April 2014 Housing Land Supply Assessment.

Thus the Plan anticipates house completion rates increasing from 367 dwellings p.a. (2001-11), to nearer 1,300 dwellings p.a, with the addition of S.O.D.C. proposals in Didcot, instead of 1,000 dwellings p.a.

Under the 2014 Oxfordshire SHMAA, South Oxfordshire is considering proposals to significantly increase development in Didcot in their 2014 Local Plan Issues Report.

ii) it fails to make sufficient provision for windfalls, and should be amended with a policy to support infill and redevelopment within Towns, Large and Small Villages, which reduces the need for allocations.

Between 2001-11 a significant proportion of new housing was completed on windfall and redevelopment sites, e.g. St Mary?s School, Wantage, Moreland Brewery, Abingdon, etc.

iii) Unlike the Milton Keynes growth area, the rate of development above economic trends is not based on a growth policy in the South East Regional Plan, to meet housing/job needs in a Sub-Regional capital

of 250,000 pop, by diverting homes/jobs from adjoining Planning Authorities in Buckinghamshire/Bedfordshire, where development is constrained by Green Belt and AONB.

The preferred economic forecast in the SHMAA, Projection 4, is over and above the forecast economic growth in the South East and Oxfordshire, as represented by the alternative Economic Baseline Forecast.

It could therefore be described as ?double counting? the current economic baseline forecast, because it does not explain where the additional growth will come from.

iv) The proposed ring fence provides no certainty that the current commuter patterns of the Vale acting as a dormitory area for commuting to Oxford, Reading, Swindon, Newbury, and London will not continue

or even be increased by the Plan?s proposals. Low salaries in scientific research will make much of new market housing unaffordable to new jobs in scientific research.

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.

PROPOSED AMENDMENT TO POLICIES 4 & 5.

Objection to the both the scale of development, which should only allocate land for homes and jobs based on the SHMAA Projection 3, the Economic Baseline Projection in Table 31-32.

and the lack of a phasing policy, which should only released additional land for development above Projection 3, the Economic Base Projection in the SHMAA, based on plan monitoring,

after a review of the Local Plan.

The proposed amendment to Policy 4 proposes for 2011-31:

NEW DWELLINGS: 12,400 dwellings, instead of the proposed 21,000 dwellings, (i.e. 623 dwellings p.year, compared to 367 dwellings p.year completed 2001-11, and 578 dwellings p.a. in the South East Plan), and

NEW JOBS: 11,000 jobs, instead of the proposed 24,000 jobs (i.e. 550 jobs p. year) compared to 570 new jobs between 2001-11, a 1% increase p.a. which is twice the forecast 0.5% p.a. for Oxfordshire.