

Comment

Consultee	Mr James Halliday (728843)
Email Address	james.halliday@foremanlaws.co.uk
Company / Organisation	Foreman Laws LLP
Address	unknown unknown unknown
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Foreman Laws LLP (Mr James Halliday)
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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.

?The SHMA does not set housing targets.? This is a direct quote from the GL Hearn SHMA report (page 183, para 9.63). Yet the Council has chosen to adopt the SHMA number, unmodified, as the Vale of White Horse District Council's housing target. Like many people I have been interested to learn more how the housing target in the SMHA has been calculated. I had assumed that the starting point would be detailed studies of the employment and housing needs of the Science Vale area, which would inform the Economic modelling carried out by Cambridge Econometrics, which in turn would feed into the SHMA report. I was amazed when I read the ?Science Vale Housing and Employment study report

to find that a) it had been written by GL Hearn Ltd (the same consultants who had written the SHMA), b) the final draft was dated August 2014 – some 2 months after the SHMA report was published, c) it stated that its starting point was the SHMA report! The authors very carefully tried to disaggregate the SHMA employment numbers for the whole Science Vale area and then split them into South Oxfordshire District Council (SODC) and Vale employment numbers. It then made assumptions about whether people would live in the Vale and work elsewhere or do the opposite, then made assumptions about household size to finally produce figures of jobs and housing need in Science Vale. I would suggest that this whole process is back to front. The Science Vale strategy should have informed the SHMA not the opposite! Furthermore, like many people I have been puzzled by the increase in jobs in the agricultural sector that was being assumed by the Cambridge modelling. I found a very useful and very thick report – the Oxfordshire Local Enterprise Partnership's Strategic Economic Plan – this 168 page report was published in March 2014 (before the SHMA report) and the LEP say 'this is our bid to Government for Local growth funding'. It explained whilst DEFRA predicted an 8.5% increase in jobs to 2020 there was also a considerable amount of agricultural research in Oxfordshire. I then realised that it was possible the LEP lobbying document was being used as a source for the economic modelling assumptions! I was interested to note that the LEP document expressed concerns about the availability of enough skilled people to sustain the predicted growth and crucially said 'Despite the significant levels of new homes planned in Oxfordshire over the next 15 years, local housing is at the limit of affordability for many who live and work here?'. Many jobs in the Science Vale area are publicly funded research posts – a sector in which pay rates are becoming less attractive as the economy picks up – this will mean despite the optimism assumed in the LEP report and the SHMA report, that the huge increase in employment may not take place, and even if it does the workers may not be able to afford to live in the Vale but will have to commute in from areas with lower house prices. I already know of Science Vale workers who commute in from Swindon, Lechlade, Newbury, Marlborough and further afield. In summary, for all these reasons, I do not agree that the Cabinet should have used the unaltered SHMA housing numbers for their housing target. Furthermore, I am concerned that the Council has assumed build rates that are unrealistic – this policy takes no account of the availability of raw materials such as bricks, nor of the skilled building labour needs – both of which are in extremely short supply.

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.

Take account of the SHMA economic forecasts, but also take account of how much development can be sustainably accommodated, and the social and environmental impacts of increasing the number of dwellings in the District by over 40% by 2031 (from the current 50,000 to over 70,000). Substantially reduce the housing requirement from 20,560 - remove the four sites totalling 1,510 dwellings in the Oxford Green Belt (N Abingdon 800, NW Abingdon 200, NW Radley 240 & S Kennington 270) and the allocated sites in the Green Belt, and constrain the amount of development being proposed for the AONB area.

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? Yes - I wish to participate at the oral examination