

Comment

Consultee	Mr Peter Gore (743654)
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Address	51 Lower Radley Abingdon OX14 3AY
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Peter Gore
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Response Date	17/12/14 12:24
Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
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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

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? No

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.

This policy sets out the housing target based on the Oxfordshire strategic housing market assessment (SHMA) which is unsound as the basis for the Local Plan: 1. The SHMA is based on wildly optimistic employment forecasts which have not been challenged or scrutinised by the Vale Council. 2. The

SHMA itself states that it should only be a starting point for the determination of housing need and that environmental, social and infrastructure constraints should be taken into account. Neither requirement has been fulfilled by the Vale Council and the Core Policy cannot be considered legal, sound or fulfilling any other duty

Furthermore previous consultations have been ignored by the Vale Council i.e. about 500 Radley residents responded in April using our standard letter. These were all considered as one objection, despite assurances from Council Leader Matthew Barber on 4th April that they would be considered individually.

Similarly the Vale now admit that there were problems with their website. It is unknown if any comments were lost as a result but an extension was granted to key landowner Radley College, whose response is dated 11/04/2014 a full week after the close. No such extension was offered to the public.

This cannot be considered 'sound' and the legality of these democratic responses being ignored by public servants must be questioned

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.

Rigorous challenge of the assumptions and conclusions of the SHMA must be completed as has happened in neighbouring authorities who concluded the assumptions/conclusions were unjustified, unsustainable and unsupportable.

Previous consultation responses must be considered in full and given due democratic weight

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