

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mrs Vivienne Illingworth
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Response Date	17/12/14 20:26
Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
Submission Type	Web
Version	0.2
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
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 figure of 20,560 is much higher than previous housing forecasts for the VWHDC. Like any forecast, it is based on a number of assumptions which may or may not prove to be correct: Economic conditions are notoriously hard to predict, as is migration. In the SHMA, 40% of the growth is due to migration. Since it seems that other districts in the South also have high in-migration allowed for, one wonders if there is double counting of the same people moving around. 40% net migration seems very high in these circumstances. Also there does not seem to have been acknowledgment of the uncertainties of technological change. We are in the middle of a technological revolution and the impact on employment of things as yet unknown cannot be predicted 17 years ahead. [It has been forecast by Oxford University

and others that there will be a reduction in administration jobs, for instance, which if correct, would reduce the in-migration figure as the unemployed take up new jobs]

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.

Rather than using a precise SHMA figure, it would therefore have been more reasonable to have worked to a range (as the IPCC does with its climate change forecasts) with an upper and lower figure. The VWHDC could then have allocated land on the basis of the lower figure (so maybe the AONB and Green Belt land would not be needed) and then review the figure after, say, 5 or 7 years. At that point if more land needed to be allocated, it could be. Planning in this way would prevent what could be the unnecessary permanent loss of sensitive land.