

Comment

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Company / Organisation	Cumnor Parish Council
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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Cumnor Parish Council (Philip Hawtin)
Comment ID	LPPub1010
Response Date	19/12/14 10:13
Consultation Point	Core Policy 47: Delivery and Contingency (View)
Status	Submitted
Submission Type	Email
Version	0.3
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 comments in this section cover Delivery and Contingency in the Vale Council's Core Policy 47 and Appendix H ? The Vale's contingency planning is inadequate. It assumes that the rate of house building falling behind programme is the only problem likely to occur. Therefore the only solution offered is to remedy the problem via planning means. This is unsound. If jobs lag behind forecasts, the developers may delay the pace of construction which in turn reduces the rate at which CIL and Section 106 monies will become available. The necessary infrastructure and affordable housing can only be provided if the planned rate of construction and associated sales can be achieved and maintained. The Plan does not explain how this fundamental difficulty could be overcome. The absence of

?reasonable alternatives? (Paragraph 1.25) ? The Council asserts that it has tested its preferred solution, as required by the NPPF, against ?reasonable alternatives?. The alternatives in question are programmes of house building explored in the Local Plan 2029 Part 1. But those alternatives applied before the publication of the SHMA and are now completely irrelevant. They cannot therefore be described as ?reasonable? and need to be replaced.

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 Plan should be amended to provide: ? for at least biennial confirmation that the expected economic and population growth forecasts are on track ? the capability to amend the programme in the light of these conclusions

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