

## Comment

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<b>Comment by</b>	Cumnor Parish Council ( Philip Hawtin)
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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.**

These comments refer to the Vale District Council's use of the SHMA figures [Core policy 4: Spatial Strategy ? see also core policies 7 (Infrastructure), 8, 15, 20 (sub-area spatial strategies)] Unjustified Prematurity ? The Vale District Council produced a Housing Update based directly and uncritically on the SHMA figures, before the full SHMA Report itself had been published. In so doing, it failed to meet the requirement of the NPPF for the social, economic and environmental elements of sustainable development to be considered together. ? The SHMA does not set housing targets. It provides an assessment of the future need for housing. Government guidance and advice is explicit that the SHMA itself must not apply constraints to the overall assessment of need, such as environmental constraints or issues related to congestion and local infrastructure. They are very relevant issues in considering how much development can be sustainably accommodated and where new development should be located.? Among the issues that were thus overlooked is the shortfall in existing infrastructure (for example in roads and education support) that calls into question the delivery of infrastructure to support the Plan. ? Had the Vale chosen to follow the conclusion of Mr Jonathan King (the Inspector at a recent Inquiry in Leicestershire) that it is necessary to test

SHMAs to ensure they are robust; it would have allowed an assessment of the interaction of economic, social and environmental considerations envisaged by the NPPF It would also have provided an opportunity to test the overall level of housing provision to be planned for, taking account of environmental constraints and issues related to transport, school places, health provision and other necessary local infrastructure in considering how much development can be sustainably accommodated. Moreover, given the Government's repeated emphasis on the need to protect existing Green Belts and AONBs, the Vale could and should have used the prior review of the SHMA to reduce its housing target so as to avoid any incursion into these protected areas.

Impracticability ? The comments about the lack of reality in the SHMA figures made under Core Policy 1 above apply with full force to the Vale numbers. The target construction figure looks inflated when set against the number of homes a year actually completed in the three years 2011-2014 (despite the easing of planning constraints introduced during the period by the implementation of the NPPF). The programme is over optimistic, although developers will secure the newly identified development sites with planning consent for construction, they will not complete houses if they cannot find purchasers for them. ? The Vale accepts that it cannot make up the backlog of the five-year housing supply within the time span, so it has subscribed to an economic plan that generates an implausible need for even greater construction. I do not accept that the Vale's apparent assumption that by adopting an over ambitious plan they will not be regarded as in default throughout the planning period when they fall short of their own, self-imposed target. A met credible target is the only way to avoid being in default.

**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.**

No Plan should be approved until the NHS has provided the necessary assurance that appropriate medical resources will be provided. Sites should not be included in the Plan unless the Vale is able to demonstrate that the infrastructure can be supplied in a timely manner. The Vale should critically review the figures emerging from the SHMA to avoid the unsound aspects highlighted above, and to prepare an appropriately revised plan.

**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