

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Joel Dothie
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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

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? Yes

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.

Paragraph 5.60 states that ?new homes allocated to this sub-area will be in balance with the forecast new jobs thus helping to deliver sustainable growth?.

However, the housing allocation for the sites at East Harwell Campus and North Harwell Campus have already been set out in the VWHDCs Infrastructure Delivery Plan as 635 new homes in the time period 2016-2021, 725 new homes in the time period 2021-2026, and 40 new homes in the time period 2026-2031. (SOURCE: Vale of White Horse Infrastructure Delivery Plan http://www.whitehorsedc.gov.uk/sites/default/files/2014_10_07%20IDP%20final.pdf)

The timescale for housing delivery set out above is actually calculated on ?The number of homes linked to infrastructure and their planned delivery from the housing trajectory? (SOURCE; VWHDC Infrastructure Delivery Plan, Summary Key Table, Page 10).

This proposed pre-allocation of housing numbers to fund infrastructure plans contradicts paragraph 5.60 of the Local Plan and will not match employment growth as delivery will be at the mercy of the housing market.

Furthermore, the SQW/Cambridge Econometrics Report states that, in relation to the Harwell Oxford Campus, the ?Enterprise Zone will not be completed by 2016 as originally proposed but it is very likely to be completed by 2031?. (SOURCE: SQW/Cambridge Econometrics Report, Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment, Feb 2014 Table K.4, page 117).

It is therefore premature to allocate unprecedented levels of housing to greenfield sites within the AONB, irreversibly destroying a protected landscape that cannot be replaced, especially when there is no accurate and clear year by year job forecast available.

The above statement also proves that the timescales for delivering the Enterprise Zone are very ambitious, and could potentially be completed 15 years after its original deadline of 2016.

It is clear that the housing allocation within the North Wessex Downs AONB is NOT linked to the growth of employment at the Harwell Oxford Campus as stated, and therefore the plan is unsound.

The only people who can truly link housing provision for supporting the Harwell Oxford Campus with the rate of job growth on the Campus is the Harwell Oxford Campus. Their vision is set out in their own Masterplan for the area which retains all development within the perimeter of the Harwell Oxford Campus and thus is legally compliant with the NPPF 115 and 116 and the CROW Act 2000, unlike the current strategic housing allocation on predominantly greenfield sites within the North Wessex Downs AONB.

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.

Summary: The VWHDC?s published schedule for delivery of the 1400 houses is out of step with the stated growth of employment foreseen at the Harwell Oxford Campus and is therefore unsound. To make the plan sound, the Vale must remove 1000 houses from the allocation within the North Wessex Downs AONB until it can be proven beyond doubt that additional housing must be built within the legally protected landscape leaving only 400 houses (including 125 already given outline permission) to be built within the perimeter of the Harwell-Oxford Campus under their control.

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