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**To:** <planning.policy@whitehorsedc.gov.uk>  
**Date:** 18/12/2014 16:54  
**Subject:** Vale Local Plan Response to Consultation on draft Local Plan Part One 2031

Objection to the draft Local Plan Part One 2031

I wish to object to the draft Local Plan Part One 2031 on the basis that it is 'unsound'. Below I outline my reasons, and what must be done, if the Vale of the White Horse, and indeed Oxfordshire as a whole, is not to lose its character and identity.

Re: Core Policy 4 & all others that flow from it, in particular, Core Policies 8, 13, 15 & 20:

1. The SHMA is unsound and unsustainable and should not be relied upon. The plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been much criticised by the public, organisations (such as CPRE) and politicians alike. In an independent critique of the SHMA commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

From these criticisms I understand that:

- The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable;

- The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire; and

- Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and housebuilding rates and it has not been subject to public consultation or independent scrutiny. Indeed, the allocation of 500 houses to the north of Shrivenham has been based upon the spurious assumption that there is employment available in Shrivenham in the Defence Academy and the Shrivenham Business Park. The Vale Council has chosen to ignore the comments from both the Parish Council and Parishioners asserting that there is little or no employment in either of these organisations.

However, I am not aware of any response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration

2. The Vale District Council has failed to give proper consideration to the environmental and social constraints within the District:

The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. As far as I understand, the Vale District Council did not attempt to undertake this further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.

3. There is a lack of appropriate infrastructure to support the Plan as outlined. I cannot see how public services and infrastructure, such as the road network, which are already over-stretched in many places can possibly be improved within the timescales to meet such a great increase in demand. I do not believe that the District will be able to cope with this level of growth and I am very concerned about the impact it will have on the environment and the countryside. I therefore believe the Plan as it currently stands to be ineffective and unsound. In particular, all the investment in infrastructure seems to be centred on the Eastern area of the Vale in the vicinity of the Science Park. Little or no investment has been allocated in the Western area of the Vale which has been asked to take a large amount of the proposed new development.

Re: Core Policy 4:

4. The consultation process has been poor. The report to the Council about the consultation process ignores important procedural and policy challenges, and seriously understates opposition to the proposals voiced both in the several thousand written comments received and at the public meetings convened to discuss the plan. I therefore believe the Plan has not been positively prepared.

For the above reasons, I consider the Plan to be unsound because it is not justified by robust evidence.

Consequently, I request that much lower housing figures (based more closely on the Government's own household projections) should be used by the Vale in its Local Plan, and that the Inspector reduces the number of houses allocated to Shrivenham.

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