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| **New%20Image1** | **Local Plan 2031 Part 2**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** |  |
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| **Name of the Local Plan to which this representation relates:** | | | | | | | | Vale of White Horse Local Plan 2031 Part 2 | |
| **Please return by** **5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) | | | | | | | | | |
| This form has two parts:  **Part A** – Personal Details  **Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make. | | | | | | | | | |
| **Part A** | | | | | | | | | |
| 1. Personal Details\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |
| \*If an agent is appointed, please complete only the Title, Name and Organisation  boxes below but complete the full contact details of the agent in 2. | | | | | | | | | |
| Title | | Mrs | | |  | |  | | |
|  | | | | | | |  | | |
| First Name | | Helen | | |  | |  | | |
|  | | | | | | |  | | |
| Last Name | | Marshall | | |  | |  | | |
|  | | | | | | |  | | |
| Job Title (where relevant) | | Director | | |  | |  | | |
|  | | | | | | |  | | |
| Organisation representing | | CPRE Oxfordshire | | |  | |  | | |
| (where relevant) | | | | | | |  | | |
| Address Line 1 | | 20 High Street | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 2 | |  | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 3 | |  | | |  | |  | | |
|  | | | | | | |  | | |
| Postal Town | | Watlington | | |  | |  | | |
|  | | | | | | |  | | |
| Post Code | | OX49 5PY | | |  | |  | | |
|  | | | | | | |  | | |
| Telephone Number | | 01491 612079 | | |  | |  | | |
|  | | | | | | |  | | |
| Email Address | | director@cpreoxon.org.uk | | |  | |  | | |
| **Sharing your details**: please see page 3 | | | | | | |  | | |

**Part B – Please use a separate sheet for each representation**

Name or organisation: CPRE Oxfordshire

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4a

4. Do you consider the Local Plan is: (*Please tick as appropriate)*

4. (1) Legally compliant NO Yes No

4. (2) Sound NO Yes No

4. (3) Complies with the Duty to Cooperate NO Yes No

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| 5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments. |
| **Oxford’s unmet need**  The Policy is not compliant with the duty to co-operate and neither is the whole Submission Plan since no duty to co-operate to provide for Oxford’s unmet need can exist until Oxford itself has defined that need. Not only has it not done so but it has resisted all entreaties to do so, and the draft Oxford Local Plan defines neither the unmet need nor Oxford’s ability to meet it, should any exist.  CPRE has provided evidence to the Oxford City Local Plan consultation that the City is capable of providing all of its need as determined by the SHMA, and more than twice its need as it would be determined under the Government’s new OAN formula now under consultation.  Whilst the local authorities have between them agreed both a notional figure and how this should be divided, this has been an arbitrary process not supported by actual evidence.  Consequently, there can be no requirement, obligation or duty to satisfy Oxford’s unmet need and the Vale Plan Review is in that way neither compliant with the duty to co-operate nor justified.  **Over-provision in relation to housing targets**  The Plan proposes 3,420 houses, bringing the total number of houses planned for the district (ie those proposed in Parts 1 and 2) to 24,748, almost 2,000 more than the housing requirement for the full Plan period (2011 – 2031), of 22,760.  The Plan outlines proposed justification for an additional 1,400 houses within the South-East Sub Area to support economic growth.  This is highly questionable given that:   * The overall economic growth targets for the County have never been subject to public consultation or robust examination * The impacts of Brexit have not been taken into consideration. * The housing growth proposed is already an addition of some 45% in relation to the housing stock in 2011.   The excuses provided at Para 2.96 give a generic explanation about why housing is needed in the South-East Vale, but do not explain why these additional houses, over and above the original target, are required.  (See also CPRE Oxon response to Policy 15a & b - Additional Site Allocations for South  East Vale Sub-Area.)  Even taking the above into account, this still leaves a gap of **nearly 600 houses** that are above target but not explained or justified.  **It is unsound to plan for a surplus.**  It is unsound to plan for a surplus against a housing target which will never be met in any case. Moreover, if the Plan goes ahead with a surplus, too much land will have been intentionally allocated and will be cherry picked by developers, doing nothing for five-year supply. If the 2,200 (allocated for Oxford’s unmet housing need) and the nearly 2,000 surplus, amounting to more than 4,000, were removed from the Plan, it would enable the Council to do away with the need for development at Dalton Barracks, the Harwell Campus, North-West Grove, Kingston Bagpuize, North of East Hanney, East of East Hanney and East Marcham. To put this in context, this would still leave over 20,000 houses being brought forward within the Plan period, the equivalent of a 40% increase in the Vale’s housing stock (subject to Pt 3 below).  **The SHMA itself is now unsound.**  The Plan is based on the 2014 Strategic Housing Market Assessment (SHMA) which is itself unsound, as CPRE has said since it was first published. It was never an assessment of housing *need* as it was sold to us, in the sense of local people needing houses, but a tool by which the Oxfordshire Growth Board and Local Enterprise Partnership (LEP) were able to justify industrialising our rural County, attracting tens of thousands more people into the area by building houses for them.  The Government has now accepted as much by publishing much lower housing need figures for Oxfordshire, in the Vale’s case reduced by 33%, and in Oxford’s case halved (to just 15,000). The Plan should be recalculated on the new OAN numbers to remove the further excess of houses (including the Oxford unmet need and the built-in surplus) and if necessary delayed to enable the District to take advantage of the new OAN regime.  **It is neither sound, nor positive, to plan without a target density to make best use of land and provide more affordable housing.**  It is unsound not to spell out a density target. We will not get cheaper houses just by planning for ever higher numbers builders will never build. The only way is to specify higher build densities which would automatically mean smaller and less expensive houses. We have enough low density high cost houses already; let us use the Plan to add high density low cost houses to the mix. We recommend that a fixed target density of 60 houses to the hectare, higher in towns, be set against which developers will have to show exceptional circumstances to fall short, and be rewarded, perhaps through CIL, for exceeding.  (Continue on page 4 /expand box if necessary) |

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| 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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. |
| For the plan to be sound it would have to be demonstrated that the Oxford unmet need was a robust and credible figure. We submit that there is no evidence to support it.  There is similarly no evidence provided for the 1,988 houses that are above the housing requirement for the full Plan period. Allocations relating to these figures should be removed from the Plan.  The Oxfordshire SHMA figures are now completely discredited as a reliable source on which to base decision-making and should be re-visited.  A fixed target density of 60 houses to the hectare, higher in towns, should be set against which developers will have to show exceptional circumstances to fall short, and be rewarded, perhaps through Community Infrastructure Levy, for exceeding.  (Continue on page 4 /expand box if necessary) |

**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.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**Yes**, I wish to participate at the

oral examination

YESs

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| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  We believe that CPRE has a useful understanding of these broader housing and cross-District issues  and could contribute meaningfully to this discussion. |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.* |

Signature: Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

I would like to be kept informed about the progress of the Local Plan YES

I would like to be added to the database to receive general planning updates YES

Please do not contact me again

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form by** **5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)