

Written statement by Paul Butt Planning Ltd on Matter 13 (also on Thu 18 February) of the Stage 2 Hearing Sessions into the Vale of White Horse Local Plan Part 1 Examination.

Matter 13 – Viability, Delivery, Monitoring and Contingency

13.1 Having regard to NPPF paragraph 174, has the likely cumulative impact of the plan's policies and standards, together with other local and nationally required standards, been adequately considered using appropriate available evidence? Is there evidence that the plan's policies and standards would not put implementation of the plan at serious risk and would facilitate development throughout the economic cycle?

13.2 Do policy CP47 and Appendix G (The Monitoring Framework) provide a sound basis for monitoring implementation of the Core Strategy and for taking appropriate action if implementation is not on track?

In relation to policy CP47 and Appendix G, no.

The National Planning Practice Guidance at Paragraph: 012 Reference ID: 12-012-20140306 advises (my highlighting in bold):

“Should all the Local Plan policies be contained in one document?

*The National Planning Policy Framework makes clear that the Government's preferred approach is for each local planning authority to prepare **a single Local Plan for its area** (or a joint document with neighbouring areas). While additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so.”*

In the event of the adoption of the Vale of White Horse Local Plan Part 1 Core Policy 4 'Meeting our Housing Needs' advises that 1900 further dwellings remain to be identified via a 'Local Plan Part 2' or Neighbourhood Plans or through the development management process.

No clear justification has been given by the local planning authority as to why a single Local Plan for its area has not been prepared to include the 1900 further dwellings that remain to be identified via a 'Local Plan Part 2' or Neighbourhood Plans (noting that none are identified in the Wantage Neighbourhood Plan Pre-Submission Plan) and, taking into account the outcome of the Green Belt and AONB issues, policy 47 and Appendix G do not provide a sound basis for taking appropriate action if implementation is not on track.

Core Policy 47 states (my highlighting in bold):

“Core Policy 47: Delivery and Contingency

If the Local Plan 2031 policies are not delivered in accordance with the monitoring framework set out in Appendix G the contingency measures identified in the monitoring framework will apply.

If the Authority's Monitoring Report shows that allocated development sites and/or development to be brought forward through neighbourhood plans are not coming forward in a timely manner, the Council will consider:

- i. seeking alternative sources of funding if a lack of infrastructure is delaying development, to bring delivery back on track*
- ii. investigate mechanisms to accelerate delivery on other permitted or allocated sites*
- iii. identifying alternative deliverable site(s) that are in general accordance with the Spatial Strategy of this plan, through the Local Plan 2031 Part 2 or another appropriate mechanism; and if required***
- iv. through a full or partial review of the Local Plan 2031.”*

What ‘another appropriate mechanism’ is, is not specified, although presumably this means through a Neighbourhood Plan or the development management process. There is no evidence to indicate that 1900 further dwellings will come forward through ‘another appropriate mechanism’, certainly not through Neighbourhood Plans or the development management process, in the event that the Vale of White Horse Local Plan Part 1 is adopted. To leave 1900 dwellings to the Local Plan 2031 Part 2 would be contrary to the Planning Practice Guidance.

Appendix G is a list of saved policies of the Local Plan 2011 and it is hard to see how any of these policies, particularly the Chapter 8 Housing policies provide a sound basis for taking appropriate action if implementation is not on track.

Paul Butt Planning Ltd

11 December 2015