

Vale of White Horse District, Local Plan to 2031, EIP Hearings

Monitoring Framework

CPRE Statement

This Report follows the Inspector's statement at the last morning of the Hearings that, as there was not time then to consider all the detail of the Framework, CPRE could deliver a separate document. There was hope, which CPRE shared, that it might be possible, after discussions with the Vale involving various parties, that CPRE could sign some statement of common ground. Alas, this in the end turned out to be quite impossible, despite our making every effort to do so.

As briefly as possible, I need to outline our hopes for the Framework in the context of the proposed Plan, the difficulties we faced in trying to work productively with the District Council, and our proposals for amendment of the Framework, in particular so that the Plan could satisfy the requirements of the NPPF and have the possibility of being sound.

In very brief, in order to cope with the situation which our best advice tells us will occur, that the SHMA's figures are based on **wholly unrealistic and INFLEXIBLE economic forecasts** and should be rejected as an economic basis for the Vale, **it is necessary to have a Monitoring Framework which will deliver timely contingency planning, to make sure that new housing and available jobs run in tandem and that infrastructure is delivered when it is needed, in line with development.** All this is of course required by the NPPF.

Our special and overwhelming concern for the Vale, **with a geography so different from most of the other Districts in the County**, is that the Plan aims for such great changes to the landscape of the District. If there is much change in national economic conditions or the forecasts for the County turn out to be inaccurate, there has to be contingency which is fit for purpose; namely **to be able to act VERY speedily**. The Framework, taken together with CP 47 and the modifications, almost wholly concerned with improvements in Indicators and Targets, being now proposed after discussion, go very little in the direction of making Actions clear and at all timely. The District Council must be in a position, and there has to be a Plan that **INSISTS**, that speedy action is taken to protect the Vale if **regular and frequent checks** show at any point that the Plan is not on course by a reasonable prescribed figure. In this regard, more frequent checks than every year must be specified: we suggest that they should occur **every three months**.

CPRE were not at all satisfied in our discussion with the District Council that the Vale would provide sufficient resource to carry out its monitoring duty at all satisfactorily. The claim made by the Vale in discussion was (1) that it had not put aside sufficient resource to do it, and (2) in any case it depended on others providing the necessary figures and actions, e.g. the County. Under (1), we suggested that the Vale provide a representative able to discuss, at another meeting (for which dates were proposed) and to take action in providing sufficient resource to help satisfy the NPPF Requirements, and under (2) we remark that it is the Vale's Plan and it can never negate its responsibility by saying that requirements they cannot provide were because they had failed to receive cast-iron guarantees from, say, the County, that would be the only way to ensure the soundness of the Plan.

Our proposals that a meeting be set-up with Vale Officers of sufficient standing to discuss these issues was, disappointingly, not taken up.

Our first concern is that growth may fall well behind expectations nationally, and certainly behind the forecasts used to determine the SHMA in Oxfordshire. From recent figures, this seems a certainty.

PROPOSAL FOR MONITORING FRAMEWORK: It should be a condition written into the **Actions to be taken in the Monitoring Framework**, that if new job totals or new use of employment land falls behind houses being built by 15% in a particular sub-area for three successive quarters, then approvals of planning applications for housing in that sub-area on greenfield sites be held up until the job totals catch-up to that extent.

Clearly such action is necessary. If it implies other changes in the Plan overall; so be it. Otherwise, the only statement that should in our view be put in the Framework would be to replace the clause after the last comma (after '...quarters,') the clause: '**then the whole Local Plan should be reviewed.**' We trust that a sufficiently strong statement of timely and necessary Action can be made to avoid such an immediate Review.

Our second concern relates to the similar need for timely Actions in respect of infrastructure needs. Highways, schools and health, in one order or another, come early on everyone's list. We pick one example (known particularly well by the writer) – though it is easy enough to find many others – concerning highways infrastructure, to emphasize the needs for appropriate Monitoring conditions.

Example: the A338 from Frilford to Wantage

The A338 example brings home the difficulties which the Framework fails to address in respect of highways infrastructure.

1. Currently, there are very often considerable tail-backs on the A338. In particular, the tail-back from the A338/A415 'Frilford' junction regularly stretches to Grove, past the main-line railway bridge (more than 4 miles). This is fed to some extent by the hold-ups regularly experienced on the A34, and in turn these tail-backs and hold-ups feed, often dangerous, rat-runs through the villages.
2. Even without the strategic housing developments proposed in the Local Plan to 2031, there is a need for massive work on the highways infrastructure now to cope with these problems.
3. The County's LTP4 highways proposals suggest a review of the A338 only as late as 2025.
4. At the Vale EiP, the County reported that they did not plan to start improvements to the A338/A415 junction (which causes the hold-ups) until 2026.
5. The strategic developments in the Wantage/Grove area will, as there are no accompanying employment possibilities at even a reasonable level in the area, generate a lot more traffic.
6. It is not at all clear just when monies will become available to finance the (north-) eastern by-pass of Wantage, to be realised at least partly from the development at Crab Hill.
7. It is not known when/if the (north-) western by-pass of Wantage will become a reality.
8. It is not known when/if Wantage Railway Station will be re-opened.
9. With the recent major withdrawal of bus subsidy funding by the County, taken together with the statements made by Stagecoach at the EiP Hearings, it is clear that the strategic developments in the Wantage/Grove area will result in a massive increase in car movements that will add substantially to the current problems of movement on the A338.

The Monitoring Framework needs to give unequivocal timely Actions to ensure that needed road infrastructure does not lag behind need. There should be no chance that half-completed developments mean that receipt of monies to build roads (and schools, etc., etc.) will be delayed whilst traffic has noticeably increased in places already overloaded with vehicles.

I should point out that CPRE asked the District Council to provide figures ahead of our meeting, in order to determine where the crunch points for travel, both now and in respect of the future determined by the Plan, but none were provided.

Of course, infrastructure should always be put in place before houses are occupied. But let us make a more modest proposal, based on the statement at the Hearings made by the Councils that they had a list of places where traffic problems would worsen.

PROPOSAL FOR MONITORING FRAMEWORK: for all roads, junctions, where it is forecasted that the traffic situation will worsen as a result of the proposals in the Plan, there should be three-monthly monitoring, and if traffic has increased by 5%, making tail-backs and other hold-ups more severe for three successive quarters, then approvals of planning applications for housing on greenfield sites within 5 miles of the bottle-neck be held up until the tail-backs and hold-ups reduce to pre-Plan levels.

Again, and we repeat: Clearly such action is necessary. If it implies other changes in the Plan overall; so be it. Otherwise, the only statement that should in our view be put in the Framework would be to replace the clause after the last comma (after '...quarters,') the clause: **'then the whole Local Plan should be reviewed.'** We trust that a sufficiently strong statement of timely and necessary Action can be made to avoid such an immediate Review.

We could easily produce similar proposals to cover other necessary infrastructure, in particular for 'internal to development' matters, such as schools, or matters which are both internal and external, such as health. We hope the Inspector can see the wisdom of our wording above – and that some such clear provision is given as an absolute necessity in the Framework, not only to meet the NPPF, but to make sure that the Vale remains a good place to live.

Peter Collins
(Dr P.J. Collins, Chairman, Vale of White Horse Committee)

28th April, 2016