

5 January 2016

working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Vale of White Horse Local Plan 2031 - Part 1 - Examination

RESPONSE ON MATTER Matter 13 - Viability, Delivery, Monitoring and Contingency (CP47 and Monitoring Framework)

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?

CPRE here addresses the cumulative impact of the proposals for housing resulting from acceptance of the SHMA figures and the evidence that the Plan's policies would put implementation at serious risk.

There has been no proper independent scrutiny by the District Council of the **viability** of the figures underlying the Local Plan proposals and the impossibility of **delivering** on the wishes and promises represented by the Plan. It is crucial that the base-line established by the new Local Plan reflects as accurately as it can the actual realistic possibilities of achieving its goals. Aspiration is no good without realism. **Monitoring and contingency** should only have to deal with minor problems along the way, not a relatively imminent whole-scale review of the Plan.

CPRE agrees with the Inspector that 'many of the issues already discussed (in Stage 1) are inextricably linked with those which will be considered as part of Stage 2'. We hope that, in this light, our continued reference to the major flaws in the Local Plan which follow from the District Council's uncritical acceptance of the SHMA figures, producing unjustified and ineffective policies, and to the accurate assessment of the economics and planning issues involved contained in Alan Wenban-Smith's independent report included in the material sent for Stage 1 will continue to be in the forefront of discussions. In our mind, this is of major, in fact crucial, importance.

A reading of the CPRE comments, underscored by the Wenban-Smith review, establishes:

- (i) The intrinsic unsustainability and unsoundness of the Oxfordshire SHMA;
- (ii) The failure of the SHMA to meet the sustainability requirements of the NPPF;
- (iii) The unsustainability of the District Council's use of the SHMA figures.

CPRE found nothing in the Statements presented for consideration for Stage 1, or in the Hearings discussions, to refute these statements.

The **lack of scrutiny** by the District Council is a scandal. The District Council's Scrutiny Committee was given but a short time to consider the Planning Policy's recommendation to adopt the full SHMA figures prior to its being put to the Full Council for a decision, and when the Committee had only received a summary of the SHMA details. At the relevant Scrutiny Committee meeting, great unease was expressed by Councillors from all parties: if they did not understand the matter well enough themselves, how would they respond to questions from their constituents? The Committee was told by a member of the Planning Policy team that the usual model used by G.L. Hearn up and down the kingdom had not produced satisfactory figures and that is why another model was sought and hence Cambridge Econometrics became involved. The Committee was also told by the same member of the Planning Policy team not to concern itself with the detail of the SHMA figures, as the team had its own experts who could be left to consider such problems. It was, however, agreed that, at the next meeting of the Committee, a representative from Cambridge Econometrics would be produced to answer Councillors' questions. This did not happen, nor was it minuted. When CPRE asked, at the meeting of the full District Council which was asked to approve the Plan, when the SHMA figures would be scrutinised, it was told that the scrutiny would be left for the EIP.

Therefore, we rely on the Inspector either to accept the conclusion - so far unchallenged - of CPRE's independent expert, Aln Wenban-Smith, or to seek advice from his own independent expert. We are sure that such advice will support Professor Wenban-Smith's conclusion that the SHMA figures are unsound and unsustainable, from which it follows that the Plan is both unviable and undeliverable, and so, unsound.

We have to avoid the likelihood, if the SHMA figures are accepted, that houses will be built for which there is no accompanying employment, or that the building of houses will stall, the 5-year supply will fail, and we will again be left with essentially uncontrolled building in the countryside and ugly half-completed building sites.

The certain **lack of infrastructure** is one of the bigger elephants in the room and at once challenges the viability and deliverability of the Plan. It is clear that national grants and county-wide policies and plans will not meet the highways need. We have already seen, for example in respect of the long-awaited building on Grove Airfield, that the cost of infrastructure is holding development back. Another example makes the highways point even more clearly. The A338 is already often at full capacity, yet all that is suggested in the County's latest Local Transport Plan (LTP4, adopted autumn 2015), on which the Local Plan relies, is a study review to be undertaken only in 2025. In the meantime, the Local Plan foresees a number of

major developments of housing on strategic sites in the Wantage/Grove area, and the County has announced at consultation meetings that it envisages use of the private car, rather than public transport, becoming a transport staple. The Hindhaugh report makes similar well-researched and established points about the A420, and much the same can be said of the A415 and A417. The major artery in the Vale, Highways England's A34, like the A40 with which it connects, will only have the funds for sticking-plaster temporary aid, where major cures are needed. Yes, the County does have proposals for a further crossing of the Thames and some initial thoughts on a new major highway to the east, linking the A34 to the A40 (which would in any case face strong resistance from those who care about the countryside), and the re-opening of Grove Station is a dear wish, but we cannot see their happening any time soon, if ever.

It should be remembered in all this that, amongst the various Oxfordshire Districts, the Vale is in its countryside rather different, having rather less to build on once one removes the AONB, the Green Belt, the western forest, the flood plain and other valued rural areas. This will of course also have repercussions on the unmet need issue.

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?

CPRE addresses failures in the Monitoring Framework and the unpreparedness and inflexibility of CP47 and the Framework to cope adequately with the ever-changing economic environment.

If there is one thing the United Kingdom has learnt over the last few years, it is that the economic environment in which we live can change unexpectedly and swiftly. Neither CP47 nor the Monitoring Framework are fit for purpose in this regard.

CPRE is of course certain that if the full SHMA figures continue to be followed, the Plan will soon be shown to have failed and a full scale revision will then become necessary. However, for argument's sake, let us suppose that the Plan works for two or three years, but then there is a sudden reversal of economic fortune, employment opportunities are much reduced, or Government or County grants have to be cut, or the infrastructure fails, roads become even more blocked, primary schools are not just over-full in some places, but are full Vale-wide, etc. These possibilities are real, and indeed some of them are to be seen now. That the action to be taken is '*to co-operate with key stakeholders*', '*to investigate alternative funding*' or '*to identify risks to development and possible contingency measures*' - we quote from the Monitoring Framework - would not seem to provide deliverable solutions in the timely fashion envisaged, for example, in NPPF 177.

It is therefore necessary to ensure that, if the economic indicators, including the rate at which house-building is completed following approval of an application to build, show a slow-down, then brakes can **quickly** be put on in respect of development in the sites, in particular strategic sites, identified in the Local Plan. This needs to be built into the Plan, together with a clear indication that housing

proposed for the (present) Green Belt and AONB should be the first to be put on hold or stopped altogether.

Further, in order to ensure that the current problems with over-capacity on the roads, or the lack of primary school places, is not further exacerbated, a condition in the Plan should be that **no houses on a development site, in particular a strategic site, be occupied until the roads and schools associated with a planning approval are completed**: it is important to specify precisely what *'delivery of infrastructure within appropriate timescales'* (Local Plan, paragraph 4.44) should mean. It is not satisfactory - see CP7 (ii) - to *'use an (unspecified) appropriate mechanism to defer part of the developer contributions to a later date'*. What we see at present, and must not happen after a new Local plan is put in place, is that some houses on a large estate are built and occupied before the associated primary school for the children living in the houses is provided, putting yet greater pressure on schooling where classes are already full. On roads, and put another way and in terms of what we commented on above, residents in the Vale should not have to wait until the County's promise to prepare a study of the A338 in 2025 to relieve the terrible congestion they experience.

END