

Wantage and Grove Campaign Group



Vale of White Horse Local Plan Examination

Matter 13 – Viability, Delivery, Monitoring and Contingency (CP47 and Monitoring Framework)

Submission from the Wantage and Grove Campaign Group.

Matter 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?

Matter 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?

1. Policy 47 introduces the monitoring framework included as Appendix G to the Local Plan Part 1 yet the index to the Appendices shows Appendix G as the list of saved policies (Local Plan 2011). The Monitoring Framework is listed as Appendix H.
2. Paragraph 7.5. of Local Plan Part 1 states
"The Council will publish information at least annually to show progress with Local Plan implementation and report any activities relating to the 'duty-to-cooperate'. The Council will use the Authority Monitoring Report to provide up-to-date information on the implementation of any neighbourhood plans that have been made, and contribute to decisions whether there is a need to undertake a partial or full review of the Local Plan 2031."
Yet no information is provided as to how the progress will be reported. We would hope that the progress against the *targets* listed in the Monitoring Framework would be reported annually and that a list of proposed appropriate *actions* would be presented to the Council for approval. Without a statement to this effect this is not a sound basis for monitoring implementation of the Core Strategy.
3. For many of the key infrastructure plans which will form part of the implementation (including any A417 and A338 improvements) no project plans have been published so these are not currently included in the Monitoring Framework.

Core Policy 47: Delivery and Contingency

4. The Policy states:
"... 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*

Wantage and Grove Campaign Group - continued

- 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.”*

The policy makes no reference to the requirement in the NPPG Paragraph: 036 Reference ID: 2a-036-20140306 to perform comprehensive assessment exercises at least every five years and to monitor indicators regularly, looking at the short-term changes in housing and economic market conditions.

5. Given the emphasis in the SHMA on the growth in employment in Oxfordshire and in particular in the Science Vale, we would expect annual monitoring of employment growth to form a key part of the monitoring framework. Without the creation of the 85,600 jobs across Oxfordshire (including the 23,000 jobs between 2011-31 in the Vale of the White Horse) the objectively assessed need for 1028 homes each year ceases to exist.
6. Given that the target applied to 2011 – 2031 we would expect the plan to include the requirement for a comprehensive review of the employment to be performed in 2016. This should be able to provide evidence found that the number of jobs in the Vale has increased by a net 5,750 since 2011. We would also expect the LPA to work with the LEP as members of the Growth Board to provide evidence that the larger figure of a net increase of 21,400 jobs across Oxfordshire has been achieved. This would ensure that the jobs in the Vale are not simply relocated from elsewhere in Oxfordshire and that the requirement to provide additional homes to meet the unmet need in Oxford can also be justified.

Appendix H

7. The Monitoring Framework in Appendix H includes four columns:

- Strategic Policies
- Indicators
- Targets
- Actions if not on target

But most of the “*Actions*” are simply to “review” the current situation and do not list the remedial action required to correct the situation and either restore the delivery to planned levels or amend the plans to meet a revised Objectively Assessed Need. For example: “Policy 13: The Oxford Green Belt” has the following:

- *Indicator: - Permissions and developments within Green Belt boundary*
- *Target: - New buildings in Green Belt are limited to ancillary structures to acceptable Green Belt uses identified by the adopted Local Plan [sic]*
- *Action: - Review decisions for development within the Green Belt*

If developments are approved which are outside the limitations shown in the *target* (which we assume should read *ancillary structures* or *acceptable Green Belt uses identified by the adopted Local Plan*) then will the only *action* be to review the decision for development?

Surely there should be some *action* to ensure that this does not happen again or that the policy should be amended to include the exception?

8. Many of the “*Targets*” are not quantified and therefore not measurable. *Indicators* must be measurable and the *target* for each policy must be achievable.

<https://knowhownonprofit.org/organisation/quality/mande/monitoring>

In the example used above for policy 13, the *target* could be reworded to read

“All *new buildings in Green Belt are limited to ancillary structures* or *acceptable Green Belt uses identified by the adopted Local Plan*”.

A plan without measurable targets for the achievement of each policy is inherently unsound.

Wantage and Grove Campaign Group - continued

CP1: Presumption in Favour of Sustainable Development

9. The *indicator* shown is
"Number of successful appeals for major development".
Yet appeals can only be applied for by the applicant. The presumption is in favour of
"sustainable development" yet there is no indicator listed to ensure that sustainability is achieved when assessed against the policies in the National Planning Policy Framework taken as a whole as described in paragraph 1.14 of the Local Plan Part 1 and that the LPA is not simply approving applications to avoid appeals.

CP3: Settlement Hierarchy;

CP4: Meeting our Housing Needs;

CP8: Spatial Strategy for Abingdon on Thames and Oxford Fringe Sub-Area;

CP15: Spatial Strategy for South East Vale Sub-Area;

CP20: Spatial Strategy for Western Vale Sub-Area

10. The implication from the grouping of these policies is that the indicators, targets and actions are the same for all of these policies. A key *target* is to

"Meet annual housing delivery targets, incl. targets identified for the ringfence."

The action relating to this is

"Review issues and actions available to bring forward / accelerate housing delivery, incl.:

- *Cooperate with key stakeholders to address challenges to delivery*
- *Consider the additional release / allocation of housing land*
- *Where concerns relating to development viability could be demonstrated, the Council may re-negotiate terms of obligations / s106 requirement / conditions"*

How can the release or allocation of additional housing land over and above that required to meet the target increase the likelihood of meeting the target except by creating large numbers of half-finished developments to further blight our very special place?

As the Plan states *"It's uniquely beautiful with a rich natural and man-made heritage"* and people will not want to live or work here if this is lost.

11. The plan makes it clear that the developments will be supported by the appropriate infrastructure as required by NPPF paragraph 7. This *action* states that
"the Council may re-negotiate terms of obligations / s106 requirement / conditions"
but makes no requirement to ensure that the appropriate infrastructure will be provided.
12. No linkage is made in the implementation monitoring between the delivery of required infrastructure and delivery of developments – this is counter to paragraph 7 of the NPPF which requires developments to be sustainable, including necessary infrastructure. Therefore the plan is unsound.

CP6: Meeting Business and Employment Needs

CP8: Spatial Strategy for Abingdon on Thames and Oxford Fringe Sub-Area;

CP15: Spatial Strategy for South East Vale Sub-Area

CP20: Spatial Strategy for Western Vale Sub-Area

CP28: New Employment Development on Unallocated Sites

CP29: Change of Use of Existing Employment Land and Premises

13. The implication from the grouping is that the *indicator*:
"Permissions and developments for employment uses by location"
applies to all these policies and that the *target* of
"Number of jobs in the district (inc. target identified for sub areas) over the plan period –
"satisfactory" progress should be made by the end of the first five years"

Wantage and Grove Campaign Group - continued

also applies to all of these policies. We assume that the numbers of jobs to be used to define the *target* are those in *ECO01.2 Vale of White Horse Employment Land Review Addendum* Table 3.3 but have no indication of the quantum of “*satisfactory*” *progress* “ therefore this *target* is unsound.

14. Another *target* associated with these policies is

“In rural areas, new employment developments limited to the re-use, conversion or adaptation of suitable existing buildings.”

This sounds more like a policy than a *target* but is not included in any of the policies listed above. Also no *action* is identified if this *target* is not met. Therefore the *target* is unsound.

CP7: Providing Supporting Infrastructure and Services;

CP12: Safeguarding of Land for Transport Schemes in the Abingdon on Thames and Oxford Fringe Sub-Area

CP17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area;

CP18: Safeguarding of land for transport schemes in the South East Vale Sub Area;

CP21: Safeguarding of Land for Strategic Highway Improvements within the Western Vale Sub-Area

CP14: Upper Thames Reservoir;

CP33: Promoting Sustainable Transport and Accessibility

15. No mention is made in the *indicators* identified to monitor these policies of the timely delivery of the infrastructure. The *targets* include

“Timely delivery of projects identified by the Council’s infrastructure evidence base (Infrastructure Delivery Plan), incl. projects identified through [a variety of sources]”

Paragraph 1.2 of *DLP07 Infrastructure Delivery Plan* states that:

“Infrastructure is the facilities and services needed to support our communities and enable the local economy to thrive. This includes:

- transportation: roads, bus routes, rail network;*
- education facilities: schools, colleges, universities, adult learning centres;*
- utilities: water, power grids, sewers;*
- community facilities: libraries, sports and leisure facilities, community centres;*
- health care: hospitals, local GP surgeries and other facilities;*
- emergency & essential services: fire, police and ambulance facilities;*
- green spaces: playing fields and sport pitches, wildlife areas; and*
- communications systems: mobile phone coverage, super fast broadband etc.”*

Yet this document also states in paragraph 12.2

“South Central Ambulance Service did not respond.”

Does this mean that no Ambulance Services will be provided to support the planned growth or that no effort was made by the Vale to gain the support of the Ambulance Service to the plan? The service already fails to meet its targets without the planned growth in population.

In September 2014 the ambulance service were called to 151 Red 1 [life threatening] incidents, reaching 105 (69.5%) within their eight minute target. This was below the service's target of 75%. The service also fell below their 75% target on Red 2 incidents - which have the potential to be life threatening - reaching 68.7% of incidents within eight minutes.

http://www.oxfordtimes.co.uk/news/14108023.Ambulance_service_below_target_for_this_year/

16. A further *target* listed for these policies is

“increase number of households with good transport access to key services or work.”

- What is the definition of “*good transport access to key services or work*”? And how can it be measured?

Wantage and Grove Campaign Group - continued

- How many households currently have “*good transport access to key services or work*”?
- Does the number of households in the target include existing households or just new developments?
- No indication is given of the level of increase required. Would an increase of 1 household be sufficient or should a higher percentage be required?

CP24: Affordable Housing;

CP25: Rural Exception Sites

17. The *targets* listed in association with these policies appear to relate to Policy 24 not to Policy 25 and therefore separate *targets* and *actions* should be designed in relation to Policy 25. For example, the first *target* states that

“all housing development proposals with a net gain of three or more units to provide 35% percent affordable housing”

yet Policy 25 states that

“Affordable housing schemes will be permitted on sites that would not otherwise be acceptable for housing development.” Does this mean that Policy 25 is being amended to allow development as long as 35% affordable housing is provided?

CP40: Sustainable Design and Construction;

CP37: Design and Local Distinctiveness;

CP38: Design Strategy for Strategic and Major Development Sites;

CP39: The Historic Environment

18. The *indicators* associated with these policies refers to the

“Number of schemes consented out supported by the Architects Advisory Panel.”

Yet no reference is made to the *Architects Advisory Panel* in the Local Plan Part 1.

19. The *target* for these policies states

“Prepare (and keep up to date) necessary conservation area appraisals and management plans.”

Yet only two of these policies make specific reference to conservation areas and this will only affect small parts of the plan area. This *target* will not ensure that these policies are monitored effectively and the plan is therefore unsound.

20. Paragraph 6.87 of the Local Plan Part 1 states:

“The Local Plan 2031 Part 1 makes provision for significant strategic growth, including a number of major urban extensions to our existing towns and villages. It is important the new developments are places where people will want to live in, and that new buildings also make a positive contribution to established settlements and the local environment.”

A *target* should be defined for Policy 37 which ensures that the details of the policy are met by all strategic developments and that monitoring takes place. The Monitoring Framework should also define *action* to be taken if the details of the policy are not being met as the development is built. Without this the requirements of the NPPF for a sound basis for monitoring implementation of the Core Strategy and for taking appropriate action if implementation is not on track are not met.

21. Policy 38 requires a Masterplan to be prepared for each housing allocation and major development site. The *indicator* should ensure that these exist and the *target* should ensure that these are followed as the development progresses and can be monitored through the development build process. *Action* should be identified which requires the developer to stick to the plan and to perform remedial work as necessary if the Masterplan is not met.

22. Paragraph 6.96 of the Local Plan Part 1 states that:

“Applications relating to heritage assets should describe the significance of the asset, including

Wantage and Grove Campaign Group - continued

any contribution made by their setting, with a proportionate level of detail relating to the likely impact the proposal could have on the asset's cultural, historic, architectural and archaeological interest."

This should be reflected in the *indicator*, *target* and *action* for Policy 39.

23. Policy 40 includes the statement that

"The Council will expect the policy requirements to be met unless it can be demonstrated that it would not be viable or appropriate to do so or where historic assets would be affected."

Therefore the applicant for any development including building conversions, refurbishments and extensions should be able to provide evidence that either the policy will be met or why it can't be met. This should form the basis of the *indicator*, *target* and *action* for Policy 40.

CP42: Flood Risk

24. The *target* for Policy 42 states:

"Residential / non-residential uses would not be permitted on functional floodplain (Flood Zone 3b) or any area of flood risk from rivers or other sources (Flood Zone 2 or above)".

This should be reworded to state

"No residential / non-residential uses ~~would not be permitted~~ on functional floodplain (Flood Zone 3b) or any area of flood risk from rivers or other sources (Flood Zone 2 or above)"

25. The *actions* for this policy state:

"Review decisions for development

Review issues and actions available to bring forward development, incl.:

- Consider the additional release / allocation of land"

How can these actions be relevant to this policy?

Surely the policy should be amended to ensure that no development takes place on Flood Zone 2 or above?

If land is not allocated in these zones then there will be no reason for applications to be approved for these areas. Given the change in rainfall patterns seen in England over the last 10 years the importance of reducing flood risk should be a key part of the Core Strategy.