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Adrian Duffield
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Dear Mr Duffield

Vale of White Horse Local Plan 2031: Part 1, Monitoring Framework

I would very much like to thank you for your involvement in the work which has taken place on the Local Plan's Monitoring Framework since the hearings in February. I have read with interest the evidence submitted by all those involved.

As you are aware I am assessing the soundness of the plan and, in this context, I note that neither national policy nor guidance requires a local plan to include a monitoring framework. That said, the National Planning Policy Framework is very clear that plans should be kept up to date (and reviewed in full or in part if necessary) and the inclusion of a monitoring framework in the Vale's plan is a way in which that aim can be realised.

I am pleased to see that the work has resulted in a degree of "meeting of minds", albeit that significant differences still exist. A large number of specific points on individual elements of the framework have been made, particularly in connection with the indicated "actions" if not on target, and I do not think it is necessary to the soundness of the plan for me to arbitrate on each of these. Fundamentally, two main disagreements exist: (i) the extent to which key elements of the plan's strategy (eg the housing requirement figure) should be reviewed if progress is not on track and (ii) the extent to which development (eg housing) should be halted if other development (eg employment uses or supporting infrastructure) does not materialise as envisaged.

Both are sensible points although (ii) is, in reality, particularly problematic. Even if approval of housing, employment and infrastructure development is carefully co-ordinated, including through the use of planning conditions and obligations, there is, in practice, little the Council can do to ensure that implementation of multiple developments is equally co-ordinated. And once approved the Council cannot readily halt a housing scheme, for example, if approved employment development does not come forward as quickly as envisaged. Moreover, much of the new housing development included within the plan already has permission, in principle at least.

On point (i) the Council's proposed "actions" within the Monitoring Framework are predominantly ones which to seek to get delivery of the plan back on track, whereas as others have suggested that missed targets should trigger a review of the strategy. In my view both are potentially appropriate, but key to determining which is the most suitable approach in a specific case is investigation of the causes of implementation of the plan not being on track. This is something which the Monitoring Framework, nor related policy CP47, currently do not require.

With this in mind I am suggesting modification of policy CP47 along the lines of the following:

If the Authority's Monitoring Report shows that implementation of the plan, either in part or as a whole, is not taking place as envisaged, the Council, in conjunction with its partners, will investigate the reasons for the situation and will implement appropriate action which may include one or more of the following:

- i. seeking alternative sources of funding if a lack of infrastructure is delaying development or causing significant problems as a result of new development;*
- ii. seeking to accelerate delivery on other permitted or allocated sites;*
- iii. identifying alternative deliverable sites that are in general accordance with the spatial strategy of the plan through the Local Plan 2031: Part 2 or other appropriate mechanism;*
- iv. undertaking a partial or full review of the plan if investigation indicates that its strategy, either in whole or in part, is no longer appropriate.*

I would encourage the Council to prepare complimentary supporting text which, whilst not undermining the soundness of the plan if, and when, it is adopted, would demonstrate the Council's commitment to always keeping an open mind as to the need for a review of the plan's strategy or specific elements of it.

Whilst I am not fundamentally opposed to the Monitoring Framework detailing "actions" for each policy it is likely to be very difficult to come up with anything which is more specific than the generic actions set out in the policy CP47 wording above and which is not either potentially irrelevant or liable to result in perverse consequences. Fundamentally, it is the investigation of the reasons for implementation of the plan not being on track which will reveal the most appropriate action.

I am therefore asking the Council to take account of the thinking which I have set out in this letter in working-up the draft modifications to the plan.

Thank you again for your involvement in this aspect of the Examination.

Yours sincerely

Malcolm Rivett

INSPECTOR