

 <p>Vale of White Horse District Council</p>	<p>Proposed Modifications to the Submission Vale of White Horse Local Plan 2031 Part One</p> <p>Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to the Planning Policy Team, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton OX14 4SB, or email planning.policy@whitehorsedc.gov.uk no later than **Wednesday 14 September 2016 by 5pm precisely.**

This form has two parts –

Part A – Your Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Main Modifications Consultation Form

The Vale of White Horse Local Plan 2031 Part 1 Schedule of Main Modifications includes a series of changes to the published Local Plan 2031 Part 1. These suggested modifications are being consulted on for a period of 8 weeks.

The Inspector is inviting comments on the proposed Main Modifications as part of the Examination process for the Local Plan 2031 Part 1. The Main Modifications have been identified by the Inspector as those necessary to make the Spatial Strategy and Strategic Policies contained within the Local Plan sound. The Inspector will consider all representations submitted to the schedule of Main Modifications consultation before publishing his final report.

Submitting Comments:

Please fill in this form and return:

- Via email to: planning.policy@whitehorsedc.gov.uk
- By post:
 - Planning Policy
 - Vale of White Horse District Council
 - 135 Milton Park
 - Milton
 - Abingdon
 - OX14 4SB
- Comments must be received by **Wednesday 14 September 2016 by 5pm precisely.** **Comments received after this time will not be accepted and will not be considered by the Inspector.**
- Please complete a separate form for each Main Modification you are commenting on.
- Please clearly identify which Main Modification your comments refer to using the reference (i.e MM1) in the Local Plan Part 1 Schedule of Main Modifications.
- Please do not repeat your previous comments as these have already been considered by the Planning Inspector. **Comments will only be considered that refer to a change as shown in the Local Plan Part 1 Schedule of Main Modifications.**

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Dr	
Last Name	Whall	
Job Title (where relevant)	Campaign Manager	
Organisation (where relevant)	Campaign to Protect Rural England (CPRE) – Oxfordshire Branch	
Address Line 1	First Floor	
Line 2	20 High Street	
Line 3	Watlington	
Line 4	Oxon	
Post Code	OX495PY	
Telephone Number	01491 612079	
E-mail Address (where relevant)	PRO@cpreoxon.org.uk	

If you do not wish to be informed of future updates to the Local Plan or other planning policy consultations in your area, please tick this box

PLEASE NOTE THAT YOU MUST PROVIDE YOUR NAME AND ADDRESS FOR YOUR COMMENTS TO BE CONSIDERED. BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE REPRESENTATIONS CANNOT BE TREATED AS CONFIDENTIAL.

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. Please give the Main Modification reference your comment relates to.

Proposed Modification Number:

Main Modification reference –

MM:34

4. Do you consider the proposed Main Modification addresses the following issues in relation to the policies concerned?

Legally compliant:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Positively Prepared:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Justified:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Consistent with National Policy:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please mark as appropriate.

5. If you have answered 'no' to any of the above please specify your reason for objecting below.

You should make it clear why the Main Modification is either not legally compliant and/or unsound explaining why the Main Modification is not:

- positively prepared;
- justified;
- effective; or,
- not consistent with national policy.

PRELIMINARY COMMENTS

Changes necessitated by changes in growth forecasts following the Brexit vote.

The Plan should reflect, as the NPPF insists, the economic constraints at the time it is approved.

The Vale Plan is to a great extent affected by the SHMA.

The SHMA relies on the economic projections constructed at the time the SHMA was itself approved.

Although there is uncertainty as to how the economy will turn out in the medium and longer term, in view of statements made by Government and in particular the Chancellor and his immediate predecessor after the Brexit vote, it is clear that all growth forecasts for at least the next five years are to be much reduced.

There is no alternative but to reflect that in the Local Plan. It would be contrary to the NPPF to ignore these changed circumstances, to pretend these changes in circumstances have not occurred and not to act now on these changes.

We regard it to be irresponsible, just because we do not know exactly just how the economics of the situation will turn out, to ignore all the indicators and to act as if the Brexit vote and the Chancellors' actions had not occurred.

So, CPRE considers that there is no alternative but to reconsider the SHMA and the economic forecasts on which it is built before any decisions are taken as to the distribution of strategic sites in the Local Plan.

The very least that is necessary, if there is any hope that the SHMA figures could in any way parallel reality, would be much to reduce what are, in any case, wildly exaggerated targets to much lower figures for five years, to give the economy a chance of recovery and to produce meaningful growth. Otherwise, housing will far outstrip employment opportunities, again contrary to the NPPF.

A start would be to remove all the proposed Green Belt sites from the Plan for at least five years.

6. Please set out what change(s) you consider necessary to make the Local Plan Part 1 Main Modification legally compliant and/or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- Re 7.5, that the Council guarantee to publish information to show progress with implementation **at least every three months (and that the council should make sure it supplies resources to do this).**
- Re 7.6, that the Monitoring Framework **should identify precisely what action is to be taken in respect of each activity measured in the Monitoring Plan, together with time targets for taking this action,** in line with three-monthly monitoring.
- Re 7.7, alongside these changes in the Monitoring Framework, that Core Policy 47 is made more precise about **just how it will ‘investigate the reasons for the situation’ and ‘will implement appropriate action’ and give time constraints under which it will ‘investigate’ and ‘act’.**
- **PROPOSAL FOR MONITORING FRAMEWORK: 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.**

Otherwise, replace the clause after the last comma (after ‘...quarters,’) with the clause: **‘then the whole Local Plan should be reviewed.’**

- **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: Otherwise, replace the clause after the last comma (after ‘...quarters,’) with the clause: **‘then the whole Local Plan should be reviewed.’**

GENERAL COMMENTS

Chapter 7: MM:34

Monitoring Framework

1. **Considering the level of change instigated by the Plan and the changed economic circumstances of the UK since consideration of its contents began, in particular recently since the Brexit vote, it is important that implementation is carried out effectively, that monitoring is carried out frequently, and that action arising from the monitoring is clearly identified, timely and well organised.**
2. **It is CPRE's view that Chapter 7 and the Monitoring Framework do not meet these criteria. It is essential that the Chapter and Framework are not out of date before the Plan is approved.** We consider that work has yet to be done in order:
 - (a) Re 7.1, that the policies 'continue to be relevant' and 'meet the requirements of national planning policy'
 - (b) Re 7.3 'to ensure development progresses in a manner consistent with the strategy identified in this plan'
 - (c) Re 7.5, that the Council guarantee to publish information to show progress with implementation much more frequently than every year – we suggest that it should be **at least every three months and that the council should make sure it supplies resources to do this**
 - (d) Re 7.6, that the Monitoring Framework **should identify precisely what action is to be taken in respect of each activity measured in the Monitoring Plan, together with time targets for taking this action**, in line with three-monthly monitoring - see (c)
 - (e) Re 7.7, that Core Policy 47 needs to be much more precise about **just how it will 'investigate the reasons for the situation' and 'will implement appropriate action' and give time constraints under which it will 'investigate' and 'act'.**
3. **CPRE considers it likely that the growth figures are most unlikely to be met, particularly since the Government's economic forecasts have been much reduced since the Brexit vote, and that there must be a clear indication, based on a frequent gathering of information, which can give a timely halt to the building foreseen in the plan if employment does not move in tandem with development or infrastructure does not cope with the needs of transport or in respect of provision in respect of schools, health or other infrastructure – all as required under the NPPF. Otherwise, a speedy move to developing a new plan will be unavoidable.**
4. In our paper, delivered as part of the EIP Hearings, we made two proposals which are in line with our comments above. We continue to regard them as necessary as adjuncts to our proposals. We repeat:

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.

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.

5. The need for identifying precise and timely actions, when such an extensive scheme is given in a Local Plan, should be clear. That problems that could occur are redoubled by the changed economic circumstances, and that in particular **the forecasts on which the SHMA were based are wholly out of date**, make this an absolute necessity.

7. Do you have any comments on the updated Sustainability Appraisal or Habitats Regulation Assessment Addendum in respect of this particular Main Modification?

No

PLEASE RETURN THIS FORM BY 5PM ON WEDNESDAY 14 SEPTEMBER 2016

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representation(s). Further submission(s) will only be accepted at the request of the Inspector.*