

## **CPRE Oxfordshire response to the consultation on the Schedule of Main Modifications to the Vale of White Horse Local Plan to 2031 Part 1**

### **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.

## **General Comments:**

### **Green Belt**

#### **Chapter 1:**

**1.28.** Delete “a full strategic review of the boundaries of the Oxford Green Belt”. It is not clear what “boundaries” means in this context but, more importantly, the extent of possible revisions for the Vale’s Green Belt to accommodate the Vale’s need are already decided and further review is unjustified and inappropriate; and Oxford’s unmet housing need is not yet quantified or crystallised and is not therefore a special circumstance justifying any review.

#### **Chapter 5:**

**MM13 iv.** We are uncomfortable with “safeguarding of long distance views of the site from Oxford” and suggest this should be “ensure that the site will be no more intrusive in views from Oxford, and aim to reduce its saliency.”

**MM16 5.41.** This gives the impression that the Inspector allowed land to be removed solely on the basis of a subjective assessment of the extent to which it met Green Belt purposes. This is not correct. Land was only released where special circumstances could be shown, these being the first consideration. We suggest rephrasing to:

*The Council intends to review a specified area of the Green Belt at Kennington, Radley and Abingdon in the light of the perceived special circumstance of housing need. In this review it will be guided by assessments within its own, and the County Council’s Green Belt studies.*

**MM16.** Add to paragraph as shown in italics:

Development will be permitted in the following settlements, which are inset to the Green Belt (as shown on the Adopted Policies Map), where the proposed development is within the existing built area of the village and in accordance with Core Policies 3 and 4, *and where the openness of the Green Belt will not be reduced.*

#### **Appendices:**

**MM36 and MM37.** We note that the page no.s for the maps indicated are both wrong – they should be listed as p.60 (MM36) and 61 (MM37), *not* pp.61 and 62.

**MM38.** Delete ‘compatible’, and substitute with ‘appropriate’.

**NEW MM.** Ref CP23 (Housing Density) of Monitoring and Implementation Framework. *The capacity to increase build densities to the higher end of PPG3 or above, across all allocated sites, will be reviewed, with an objective to reduce land take for all sites and/or release some sites entirely from development, particularly those in the Green Belt.*

#### **Appendix 1 To Schedule of Main Modifications: Map Changes:**

**Figure B18.** We query whether the playing field gap between the Green Belt Review areas to East and West has defensible boundaries.

### **Harwell Campus sites**

#### **Chapter 4:**

**MM5.** CPRE is very satisfied that the East Harwell Campus and North-West Harwell Campus sites have been withdrawn from the Plan and we support this modification.

## Ring Fence Area

### Chapter 4:

#### **MM6. (Paragraphs 4.21 and 4.22)**

We are concerned at the proposed changes to the "Ring Fence Area". Originally this was going to be separate small areas around the developments in the Science Vale, however, the proposed change in MM6 is to make the "Ring Fence" include the whole of the Science Vale and sites and settlements immediately adjacent to it, 'to ensure appropriate flexibility in its operation'.

We are concerned that this could mean that villages like East Challow, Denchworth, East Hanney, Steventon etc. may be included in the "Ring Fence" and may therefore be subject to further development in the future.

We believe this is a way of extending the development area by stealth and would like to see the deletion of this modification.

## Monitoring Framework

### Chapter 7:

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.

**September 2016**