



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official use
only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

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

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.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing
(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

Mr

N

McLoughlin

Managing Director

McLoughlin Planning

North Warehouse

Gloucester Docks

Gloucester

GL1 2FB

Nathan.mcloughlin@mplanning.co.uk

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Legal and General Homes

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4. (2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4. (3) Compiles with the Duty to Cooperate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see the attached.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant 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.

Please see the attached

(Continue on page 4 /expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

please see the attached.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Please see the attached.

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

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MP Ref: NM/L&G
Email: nathan.mcloughlin@mplanning.co.uk

21 November 2017

Planning Policy
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB
VIA EMAIL ONLY

Dear Sir/Madam

**Vale of White Horse Local Plan Part 2
Representations on behalf of Legal and General Homes**

McLoughlin Planning is instructed by Legal and General Homes (L&G) to make submissions on the Vale of White Horse Local Plan Part 2 in respect of its land interests at Shrivenham.

In terms of the focus of the representations, these are set out below as follows:

Development Policy 2: Space Standards

In general terms L&G are conscious of the standards and do not dispute their inclusion in the plan in principle.

However, in so doing, it has to be recognised that standards can have a significant implication on the overall viability of development scheme and the policy should only be used in the determination of new applications and it should be avoided in the case of Reserve Matters for previously permitted outline schemes. There are a considerable number of outline permissions which have yet to secure the benefit of reserve matters. In negotiating the package of S106 contributions from outline schemes, detailed discussions have been undertaken about the viability of developments, space standards play an important part in the overall calculation as this determines the overall value of the scheme.

In particular, it is felt that the Policy could be used to seek to impose standards and costs which had previously been considered as part of the process in consenting land. In L&G's case, their interest is specific to land to east of Highworth Road, Shrivenham. Whilst some flexibility is provided for in the policy, subject to viability, such negotiations can stall the delivery of development sites further and are generally counter-productive to delivering housing, especially where there are other major planning benefits forthcoming.

In addition, L&G have some general comments about the use of standards and the evidence base which underpins them.



Firstly, the Plan's own evidence identifies the most new development is above the space standards, as reference at paragraph 2.17 of the Viability Update which forms part of the evidence base.

Secondly, 'would be unviable' places the onus on the applicant. It is the Council's responsibility to ensure that its policies are viable. Indeed, within the councils Viability Update to the Local Plan Part 2 dated February 2017, there appears to be no recognition of the increased costs associated with meeting the proposed standards.

Thirdly, the Council will require that 15% of all market dwellings and all affordable dwellings homes on major development sites will be built to Part M4 (2). The Council will need to demonstrate the need for this optional standard in accordance with the guidance in the NPPG. It will also have to assess the viability of this in combination with its other local plan policies. It is L&G's position that Part M4(3) cannot be applied to the market element of the scheme. We refer the Council to the NPP (Paragraph: 009 Reference ID: 56-009-20150327).

The supporting evidence (Housing Study: To support the development of a Joint Housing Delivery Strategy for South Oxfordshire and Vale of White Horse) identifies that "The majority of dwellings in South and Vale, as represented by properties on the market for sale, meet or exceed the new nationally described space standards in terms of Gross Internal Area".

Furthermore, 6.20 of the report concludes that "there is evidence from the Council's Disabled Facilities Grant applications of the need for some homes to meet the needs of people who have limited mobility and those who use wheelchairs and may need Category 3 dwellings. Wessex Economics recommend that there should be an additional requirement to provide wheelchair accessible affordable homes, in line with demand on the waiting list and applications for Disabled Facilities Grants".

However, the final report then also concludes at 6.21 that the "Category 3 standards should only be applied where a local authority's allocation policies can match the home to a particular person; otherwise dwellings should be built to wheelchair adaptable level".

Therefore, in supporting any standard, it has to be demonstrated that the need exists locally, rather than as a blanket policy requirement.

Development Policies 33 and 34

In terms of open space and facilities contributions, L&G support the principle of such provision. However, in terms of the application of standards in the determination of reserve matters applications pursuant to existing extant outline consents, the policy could add an additional financial cost to the development, which has already been the subject of detailed negotiations with the Council in the S106 agreement.



Changes Sought

In the interests of clarity, it is proposed that the explanatory text to the above policies makes it clear that these standards only apply to new development proposals for sites which are yet to be consented and not to be retrospectively applied in the determination of reserve matters applications pursuant current extant outline consents where there has already been significant detailed debate and consideration of the standards issue through the viability process.

Yours faithfully

Nathan McLoughlin BSc (Hons) DipTP MRTPI
Director