

Comment

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Company / Organisation	Planning Potential
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Company / Organisation	Green & Co
Address	N/A N/A N/A
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Green & Co ()
Comment ID	LPPub808
Response Date	18/12/14 12:19
Consultation Point	Core Policy 24: Affordable Housing (View)
Status	Submitted
Submission Type	Web
Version	0.3
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	Yes

If your comment(s) relate to a specific site within a core policy please select this from the drop down list.

N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

We support Policy 24 as it clearly sets out the requirement for affordable homes and the tenure mix that is expected in accordance with Paragraph 159 of the NPPF that requires LPAs to address the need for all types of housing, including affordable housing.

Furthermore, the policy provides flexibility to ensure that the development is deliverable where the viability of a scheme would be jeopardised, should the full affordable housing requirement be met. This is also in accordance with the NPPF which states that in pursuing sustainable development, careful attention to viability and costs in plan-making and decision-taking must be taken and that plans should be deliverable (Paragraph 179 of the NPPF).

Although we support the Council's overall policy approach, we refer you to updated guidance in the National Planning Policy Guidance (NPPG) (Paragraph: 012 Reference ID: 23b-012-20141128). This states that contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm. Policy 24 sets the threshold for requiring affordable housing at a net gain of three or more dwellings (sites of at least 0.1 hectare). We consider that the Inspector is likely to find this 'unsound' as it is not in accordance with recent national guidance. As such, we would encourage the Council to amend the first sentence of Policy 24 to state:

"The council will seek 35 % affordable housing on all sites capable of a net gain of 10 or more dwellings or which have a maximum combined gross floorspace of more than 1000sqm."

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

We would encourage the Council to amend the first sentence of Policy 24 to state:

"The council will seek 35 % affordable housing on all sites capable of a net gain of 10 or more dwellings or which have a maximum combined gross floorspace of more than 1000sqm."

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.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

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

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We are acting on behalf of our client who has an interest in the North West Abingdon-on-Thames strategic allocation and as such, we request to participate in the EIP in order to support this site and other policies in the plan.