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Vale of White Horse District Council  
135 Milton Park  
Milton  
Abingdon  
OX14 4SB

Wednesday 22 November 2017

**Re: The Local Plan 2031 Part 2: Detailed Policies and Additional Sites – Publication Version Consultation**

We write with reference to the above and welcome the opportunity to submit comments to assist in the preparation and examination of the Vale of White Horse Local Plan Part 2. Please treat this as our formal representations on this consultation, duly made within the required timescales.

Building around 12,000 new homes a year in more than 400 locations nationwide, Persimmon is one of the UK's leading house builders, committed to the highest standards of planning, design and construction. Persimmon Homes is actively engaged with the delivery of various strategic and non-strategic mixed-use and residential schemes in the Vale of White Horse district and so is well placed to comment on the draft Local Plan Part 2.

These representations follow those submitted to the Preferred Options consultation earlier this year.

Our representations seek modifications to the Plan and we consider that it is necessary for Persimmon Homes to participate at the oral part of the examination.

**Development Policy 1: Self and Custom-Build**

The Publication Version of the Local Plan Part 2 introduces a new policy which supports the provision of self and custom-build plots in the authority.

It is understood that this policy has been introduced in response to the Self-Build and Custom Housebuilding Act 2015 and Housing and Planning Act 2016, however other than noting that there are 174 individuals and organisations who have expressed an initial interest on the Council's Self-Build and Custom Build Register, no other evidence is provided to justify the need for such a policy. It should be noted that the provision of any self-build plots would directly

reduce the land available for 'traditional' market and affordable homes, the need for which is known and significant.

Nevertheless, Persimmon Homes acknowledges that the policy as worded does not propose an absolute requirement for self-build plots to be incorporated into major development schemes and this is supported. The Viability Report update (October 2017) also recognises this and provides no assessment of the potential viability implications of a requirement to provide self-build plots.

Development Policy 1 identifies a series of clauses related to the provision, sale and completion of self-build plots which is queried. The Policy notes that "*Planning permissions will include conditions requiring Self and Custom-Build housing to be completed within 3 years of a self or custom builder purchasing a plot*". It is considered that this condition would not meet the tests of paragraph 206 of the NPPF as it would not be enforceable. Depending on the wording of such a condition it could also potentially halt the completion of a major site if the self-build house was not completed. It is also unclear how a self-build plot may contribute towards affordable housing provision.

### **Development Policy 2: Space Standards**

The Preferred Options consultation sought to introduce the Nationally Described Space Standard to Development Policy 2 and this latest consultation retains this proposed policy. This policy is unsound on the basis that it is not justified.

The Government introduced the nationally described space standards in March 2015, providing local planning authorities with the option of adopting these additional technical requirements - which exceed the standards required by Building Regulations. In introducing these optional technical standards, the Government stated that "*Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans*".

Persimmon Homes objects to the proposed introduction of the nationally described space standard in the Vale of White Horse district. It is unclear why the Council waited until the Preferred Options consultation to introduce the nationally described space standard, which had been an option available to local planning authorities for the previous two years.

Standardising housing sizes affects the market's ability to do this naturally. It is therefore vital to understand the context of the housing market to determine the likely effects of applying a minimum space standard. It is important to note that customer choice is not limited to new build as the existing second hand market forms the vast majority of the choice available. The District Council should take account of the impact of potentially larger dwellings on land supply and consider impacts on the affordability of new homes coming onto the market.

Policy DP2 has been informed by the Oxfordshire Strategic Housing Market Assessment (SHMA) (April 2014) which assesses the need for housing within the county and provides guidance for a variety of housing and planning policies. With regard to 'housing size' however, the SHMA reports on this in terms of number of bedrooms and not floor space, so it is unclear where the evidence to justify a space standard has been derived from. Indeed, whilst the

District Council's Viability Update (February 2017) does refer to the implications of the national space standard, this document also casts doubt on the need for these standards stating "*we understand from the Council that most new development is above these standards...*" (paragraph 2.17) rather than quoting any empirical evidence.

Our representations to the Preferred Options consultation criticised the lack of evidence to justify the local need for these additional standards. In support of the Publication Version of the Plan the Council has published an updated Viability Statement (October 2017). However this brief report provides no further comment or evaluation of the impact of introducing the nationally described space standard.

The approach to setting a nationally described space standard has been subject to criticism since it was introduced in 2015. The recent Housing White Paper '*Fixing our Broken Housing Market*' (published by the Department for Communities and Local Government on 7 February 2017) confirms the Government's intention to review the space standard to ensure greater local housing choice. The white paper notes at paragraph 1.55 that "*the Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households*". With this in mind, the Vale of White Horse District Council should reconsider its intention to adopt the space standard.

Development Policy 2 should be deleted from the draft Local Plan Part 2.

If the Council does still intend to introduce the nationally described space standard, it should set out a reasonable transitional period following adoption to enable developers to factor the cost of space standards into future land acquisitions.

It is also unclear as to whether the Council is seeking to apply the space standards to all new residential development or proposals for one and two bedroom market homes and affordable housing only.

Development Policy 2 also seeks to ensure 15% of market dwellings and all affordable housing is constructed to the Category 2 standard set out in the Building Regulations Approved Document M Part 2 except where proposals demonstrate they would be unviable. This standard sets out provisions to allow residents to gain access to the dwelling and its facilities including step-free access and other measures to assist occupants with reduced mobility.

There is however an additional cost and design implications on this standard and as such it would be useful to understand how the Council has reached this 15% figure. It may be more appropriate to treat such a requirement on a site-by-site basis so that proposed developments respond to known local needs, or require a lower proportion (5%) to be built to adaptable standards.

The revised Development Policy 2 also introduces a further requirement to meet Category 3 standards, stating "*For site of 100 units or more, 5 % of affordable housing should be built to Category 3 standard and an allowance of 2 % of market housing will be delivered to Category 3 standards if there is demonstrable need*".

The updated Viability Statement (October 2017) provides only a brief comment on the indicative additional costs of meeting Category 2 and 3 standards. It is unclear where the need for this requirement has been derived from and therefore the policy is unsound as not justified.

#### **Development Policy 17: Transport Assessments and Travel Plans**

It is reasonable that applications for major development be supported by a Transport Assessment or Statement, as appropriate, in order to facilitate an evaluation of the proposal in terms of transport impact.

The proposed introduction of a requirement for all major development proposals to be supported by a Travel Plan is, however, overly onerous and inconsistent with national planning policy. The NPPF states that "*All developments which generate significant amounts of movement should be required to provide a Travel Plan*". The need for a Travel Plan should therefore be considered on a site-by-site basis and this requirement should be removed from Development Policy 17. As a minimum, a higher threshold for the need for a Travel Plan should be identified.

Development Policy 17 is therefore unsound as it is not justified and not consistent with national policy.

#### **Development Policy 20: Public Art**

As stated in the draft Local Plan, "*Good design is a key aspect of sustainable development and should contribute positively to making better places*". Public art is one way of contributing positively to the making of a place but is not the only way of doing so. As such, it is inappropriate to include a policy that requires public art on all sites larger than 0.5 hectares.

#### **Development Policy 23: Impact of Development on Amenity**

#### **Development Policy 24: The Effect of Neighbouring or Previous Uses on New Developments**

It is unclear how these policies would be assessed and there is a justifiable need for them. The policy as currently written repeats other policies within the plan including Development Policy 25: Noise Pollution.

#### **Development Policy 29: Settlement Character and Gaps**

Persimmon Homes supports the amendment to Development Policy 29 in response to comments submitted on the Preferred Options version of the Plan.

#### **Development Policy 33: Open Space**

The integration of high quality, usable open space is an important consideration in planning for new residential schemes. However the Local Plan's proposed approach to open space is overly prescriptive. The open space standards set out in Appendix K do not allow for a flexible response to the individual characteristics of each site and development proposal.

## **Development Policy 34: Leisure and Sports Facilities**

It is unclear how this policy and supporting Appendix advises on the likely need for new sports facilities and how a financial contribution may be calculated. It would be appropriate to incorporate such infrastructure projects into the Council's emerging Community Infrastructure Levy Regulation 123 List so that they could potentially benefit from CIL funding.

Yours sincerely

**Persimmon Homes**

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