



THAKEHAM

Vale of White Horse District Council
Planning Policy Team
135 Eastern Avenue
Milton Park
Abingdon
OX14 4SB

28th March 2019

Dear Sirs,

Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites – Main Modifications Consultation (March 2019)

Thakeham Homes Ltd are submitting representations in relation to the Main Modification Consultation of the Vale of White Horse Local Plan 2031 Part 2. Thakeham are a housebuilder based in Sussex, with a proven track record of delivering high quality, sustainable schemes across the South East. We make the following comments about the proposed main modifications and ask for them to be taken into account during plan preparations:-

Mod No. MM2 - Core Policy 4a: Meeting our Housing Needs

Core Policy 4a in the Vale of White Horse (VOWH) Local Plan Part 2 sets out a housing requirement of at least 22,760 homes to be delivered over the plan period between 2011 and 2031.

As part of this housing requirement, we are pleased to note that the Vale of White Horse District is taking 2,200 homes of the unmet housing need from Oxford City, as agreed at the Oxfordshire Growth Board meeting in September 2016. This is a welcome step in positively seeking to accommodate housing growth in the wider cross-boundary area.

Notwithstanding this, the figure of 2,200 homes was set some time ago in 2016 since when there has been a clear Government mandate to significantly boost the supply of housing. Additionally, whilst the Oxfordshire Plan 2050 is in the early stages of preparation with a recent Call for Ideas, it is still considered important to acknowledge its early scope and ambitions to deliver considerable housing growth in Oxfordshire area.

This includes Oxfordshire authorities notably progressing a joined up approach to the release of Green Belt. In return for central Government funding support for affordable housing, infrastructure and economic growth, the Oxfordshire authorities are committed to the delivery of 100,000 new homes by 2031 through the Oxfordshire Housing and Growth Deal. It is

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recognised that the delivery of this number of homes is justified largely on the basis that planned levels of economic growth will increase the need for homes as well as contributing to the 1 million homes target in the Cambridge-Milton Keynes-Oxford arc.

Consequently, we consider that to future-proof the VOWH Local Plan 2, it would be necessary to revise upwards the unmet housing need figure from Oxford, especially given the national change and forthcoming regional changes inevitably affecting the 2016 figure.

We also have significant concern that only 2,252 dwellings are delivered through strategic allocations (LPP1 Allocations) and 2,420 dwellings through additional allocations (LPP2 Allocations). These figures have been considerably revised down from 12,495 dwellings for LPP1 and 3,420 dwellings for LPP2 prior to the main modifications. Instead, there has been a considerable uplift in the number of Known Commitments from 3,061 to 13,387 dwellings and it is unclear why this is the case. There appears to be no reasoning for this uplift in the Known Commitments within the draft Local Plan and this needs to be included for transparency in the preparation and soundness of the plan.

Irrespective of the apparent lack of reasoning for the significant uplift in known commitments, we consider that this is a particularly vulnerable and potentially unsound approach to plan making. This is on the basis that with this volume of schemes benefitting from planning permission (known commitments), it is unrealistic to assume that they will all be delivered and instead can falter ahead of construction for any number of reasons such as funding, developer interest and logistical constraints. With known commitments forming such a significant number and contribution towards housing land supply at the expense of allocations, we would expect a more balanced approach to be taken in the interests of soundness of the Plan.

Furthermore, there is a considerable reliance on windfall applications coming forward. There is a windfall allowance of 1,000 dwellings which is expected to be delivered through Neighbourhood Development Plans. However, there are currently only six 'made' Neighbourhood Plans in the District (as of February 2019). There are currently two Neighbourhood Plans undergoing independent examination and a further two in the process of public consultation. Although there are a further twelve parishes preparing plans, these are all in the very early stages. Consequently, there is considerable concern about whether this windfall allowance will be met and may lead to under-delivery in the supply of housing leading to an early review of the Plan. It is considered that there should be clear evidence and justification to show that these parishes have sufficient capacity for the envisaged quantum of development and that neighbourhood plan groups are meaningfully preparing their plan.

Mod No. MM15 - Development Policy 2 (Space Standards)

Whilst we note the proposed modification to Development Policy 2 which widens the scope of applying national space standards, we would still maintain our previous objection that there has been insufficient justification to support the stipulation that 5% of affordable homes must meet Building Regulations M4 (3)(b) Category 3 (wheelchair user) accessible standards, along with 2% of market housing.

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Planning Practice Guidance is clear that evidence is required to demonstrate need and viability prior in proposing and implementing these standards. The Planning Practice Guidance states that when considering whether to apply the national standards, Local Planning Authorities should take account of the following:

- **need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- **viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- **timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.*

Paragraph 020 Reference ID: 56-020-20150327

Whilst we generally support the delivery of residential units to meet the needs of those with health needs, the requirement of 5% affordable homes meeting Building Regulations M4(3) is considered too onerous and we would suggest that this policy is unsound and should be deleted, however should the policy remain a degree of flexibility needs to be applied.

In accordance with the PPG, the national minimum space standards can only be applied through a policy in a Local Plan, where the Local Planning Authority has demonstrated through evidence that there is a need for space standards, and that viability is not compromised. As such, any policy in the emerging Vale of White Horse Local Plan which intends to require compliance with the Nationally Described Space Standard must be supported by clear evidence of need, viability and timing.

In summary, further work is required to demonstrate that the unmet need of Oxford is in the order of 2,200 dwellings given the national and regional changes that have taken place since this figure was agreed in 2016. There is also concern about the significant increase in the number of known commitments at the expense of allocations in the Plan. We would also question how the large number of anticipated windfall applications can be brought through and delivered successfully by neighbourhood plans over the plan period. Namely, there are very few 'made' plans within the district and the majority of neighbourhoods do not have a plan in preparation. We do object to the space standards policy (Policy 2) in requiring 5% of affordable new homes expecting to meet Building Regulations M4 (3) (wheelchair accessible) standard on the basis of insufficient justification and on viability grounds.

Please do not hesitate to contact me if you have any queries or require any further information.

Yours Sincerely,



Katie Gilbert
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