



THAKEHAM

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

22nd November 2017

Dear Sirs,

Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites – Publication Version (October 2017)

Thakeham Homes Ltd are submitting representations in relation to the Publication Version of the Vale of White Horse Local Plan 2031 Part 2. We previously submitted representations in respect to the Preferred Options consultation dated 4th May 2017. Thakeham are a house builder based in Sussex, with a proven track record of delivering high quality, sustainable schemes across the South East.

Housing Supply and Unmet Housing Need for Oxford

We acknowledge the Local Plan Part 2 provides an uplift to housing targets to account for Oxford's unmet housing need. However, within the same HMA, South Oxfordshire District Council has agreed to meet only part of Oxford City's unmet housing need for around 3,750 new homes (Policy STRAT3 of the South Oxfordshire Local Plan 2011 - 2033). According to the Oxfordshire Growth Board, the recommended apportionment of housing for South Oxfordshire is 4950 dwellings. Therefore, 1200 dwellings are still to be delivered in South Oxfordshire as part of Oxford's unmet housing needs (although this will be monitored with adoption of the Local Plan for Oxford City).

This position is further confirmed in Section 4.22 of South Oxfordshire's 'Duty to Cooperate - Draft Statement of Compliance':-

It is recognised that the Duty to Cooperate is not a duty to agree. We are making contributions towards the some of the yet undetermined unmet housing need for Oxford City. The Publication Local Plan does contain provision to meet a quarter of the unmet housing need from Oxford City. This is based upon the Oxfordshire Growth Board working figure of 15,000 homes to be addressed on a County wide basis shared between the four local planning authorities.

Consequently, South Oxfordshire is not confirming that they will take their full apportionment of unmet housing need.

According to the Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area, South Oxfordshire proposes submission of its draft Local Plan including

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a response to the apportionment in Spring 2017. Until such times as this is confirmed, it is considered that the Vale of White Horse should adopt a cautious approach to South Oxfordshire's position on unmet need and look to increase housing provision in the Local Plan Part 2 (leading from a baseline of at least 22,760 dwellings over the Plan period). This would help to ensure flexibility within the HMA to meet full objectively assessed housing need and to accommodate the agreed working figure for the unmet housing need for Oxford.

Development Policy 2 (Space Standards)

Development Policy 2: Space Standards stipulates a requirement for residential development sites of 100 units or more to deliver 5% of affordable new homes to meet Building Regulations M4 (3)(b) Category 3 (wheelchair user) accessible dwellings standard and 2% allowance of market housing.

We wish to object to Policy 2 since the Council has provided little justification to support the stipulation of such standards. Planning Practice Guidance is clear that evidence is required to demonstrate need and viability prior to 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, more work is required on the housing numbers for Part 2 in respect to South Oxfordshire's unconfirmed position on Oxford's unmet housing needs. It is considered that housing numbers should be increased in Part 2 to ensure sufficient housing is provided in the

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HMA, as South Oxfordshire have not confirmed if they will incorporate the full apportionment set out by Oxford's Growth Board. It must be clear how the remainder of any unmet housing need for Oxford is to be delivered in the current plan period in order to demonstrate effective joint working for the soundness of the plan.

We object to the space standards policy in its requirement of 5% of affordable new homes meeting Building Regulations M4 (3)(b) Category 3 (wheelchair user) accessible dwellings standard on the basis of little justification and on viability grounds.

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

Yours Sincerely,

Damian Sullivan
Planning Manager