

Comment

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Consultee	Greenlight Developments Greenlight Developments (879102)
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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Greenlight Developments Greenlight Developments
Comment ID	LPPub3380
Response Date	22/01/15 11:15
Consultation Point	Core Policy 24: Affordable Housing (View)
Status	Submitted
Submission Type	Email
Version	0.8
Files	APPENDIX 1 (Greenlight Developments).pdf
Q1 Do you consider the Local Plan is Legally Compliant?	No
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

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.

Clearly in light of the very recent up-dates to the Planning Practice Guidance on 28th November 2014, Core Policy 24 needs to be up-dated to reflect these new national provisions. Reference ID: 23b-012-20141128 states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. The PPG 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.

The wording of Core Policy 24 needs to be less prescriptive. At present it states that 'There should be a 75:25 split for rented (either social or affordable) and intermediate housing respectively?', which is too rigid.

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.

Core Policy 24 needs to be up-dated to reflect the new national provisions for affordable housing contained with ID: 23b-012-20141128 of the PPG. As such the 3 dwellings / 0.1 hectare threshold is replaced by the 10 dwellings or 1000sqm threshold.

The wording with respect to the tenure split needs to be re-worded to say: 'The final tenure mix of affordable housing on individual sites will be subject to negotiation with the Council's starting point being a 75:25 split for rented (either social or affordable) and intermediate housing respectively.'

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:

The nature of our representations is strategic and has key implications.