

## Comment

Agent	Mr Philip Rawle (879101)
Email Address	philip.rawle@prp-consultants.com
Company / Organisation	PRP Consultants
Address	Unit 2B, The Tack Room Worcester Road Worcester WR6 6NH
Consultee	Greenlight Developments Greenlight Developments (879102)
Address	Unknown Unknown Unknown
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Greenlight Developments Greenlight Developments
Comment ID	LPPub3374
Response Date	22/01/15 11:10
Consultation Point	Core Policy 22: Housing Mix ( <a href="#">View</a> )
Status	Submitted
Submission Type	Email
Version	0.7
Files	<a href="#">APPENDIX 1 (Greenlight Developments).pdf</a>

**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.**

We have several concerns regarding the wording of Core Policy 22. It is over-reliant on the SHMA data, rather than using the data as a ?jumping off? point to which broader policy considerations must then be applied.

We are of the opinion that care needs to be taken with any planning policies that become too prescriptive in the house-types that should be delivered on a given site. We appreciate that there should be a mix of house types across a site, and this assists with the efficient and effective use of land, but an overly prescriptive policy on the number of any particular house-type that can be built on a site, which in part should be a commercial decision, could end-up stifling development at a time when house building is desperately required to take place in order to boost significantly the supply of housing.

On this basis, it is suggested that Core Policy 22 needs to recognise that developers of market housing will understand the local market demand better than anyone and this information will be used to determine an appropriate market housing mix for both site allocations and in the determination of planning applications.

With the levels of affordable housing required (35%) it is usually apparent that the smaller dwellings within a scheme are the affordable units (usually 2-bed properties for the shared ownership products). This provision it is believed will help to meet the requirement for smaller properties. From a viability point of view, without being so schemes would not happen in the first place, the larger properties tend to be the open market dwellings. The emerging Local Plan needs to understand and recognise this.

**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.**

The comments made under Point 5 above need to be incorporated into the policy or its supporting text. It is also suggested that there should be a threshold at which this housing mix policy comes into play, as any specific requirements could impact on the viability of schemes. In light of the Government's recent up-dates to the Planning Practice Guidance on 28th November 2014 (Reference ID: 23b-012-20141128), this threshold should be set at over 10-units.

**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 strateic and has key implications.