

Our Ref: ST/VOWHLPreps

18 December 2014



Planning Policy
Vale of White Horse District Council
Benson Lane
Crowmarsh
Wallingford
OX10 8ED

Dear Sir or Madam

Re: Vale of White Horse Local Plan 2031 – Strategic Sites and Policies

I refer to the Vale of White Horse Local Plan 2031 – Strategic Sites and Policies and wish to make a number of representations. These Submissions are made on behalf of Blue Cedar Homes, a private retirement homes specialist operating in the South West of England. I have spoken with Scott Riley of the Policy Team who has confirmed that my representation can be made via this letter.

Duty to Cooperate

Under Paragraph 181 of the National Planning Policy Framework (NPPF), Local Authorities are expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination.

The Vale of White Horse District Council has three neighbouring local authorities namely South Oxfordshire District Council, West Oxfordshire District Council and Oxford City Council. Under Paragraphs 17, 157 and 178 of the NPPF, neighbouring authorities should work jointly together and co-operate to address planning issues which cross administrative boundaries or on matters that are larger than local issues.

The Council should co-operate with its neighbouring authorities to ensure that all housing needs are addressed. The Vale of White Horse Local Plan 2031 is proposing 20,560 dwellings for the Plan period. However these housing figures need to be assessed in conjunction with neighbouring authorities.

A reduction in housing provision across the region could have significant implications such as worsening an existing housing affordability crisis and increasing the number of households living in housing stress. The Vale of White Horse District Council should not assume that just because its neighbouring authorities have not drawn attention to any matters of a strategic nature, such strategic pressures do not exist. If neighbouring authorities are not adequately assessing housing needs, these housing pressures could impinge upon the Vale. Likewise, it cannot be assumed that neighbouring authorities have planned to accommodate any under supply of housing provision from the Vale of White Horse.

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In conclusion, there is no evidence that there is any capacity or willingness among any of the neighbouring authorities to absorb any under-provision of housing that may occur in the Vale of White Horse District Council nor vice versa. The Council will have to address this issue in order to satisfy its legal obligations under the duty to co-operate.

Key Challenges and Opportunities – Providing for our Housing Need (Page 22)

Blue Cedar Homes, as a retirement homes provider, welcome reference in the draft Local Plan to meeting the needs of an increasingly ageing population. We support the overall drive to provide more housing for the elderly. As set out in the text, housing provision for an ageing population is a critical issue for the District with the total number of people aged 55 and over expected to increase by almost 50% during the plan period. Therefore, reference to the provision of specialist, market housing for the elderly is a necessity.

Spatial Vision and Strategic Objectives – Strategic Objective SO2 (Page 30)

Whilst references to catering for existing and future residents' needs and provision for a growing older population are welcome, we believe that the policy should be strengthened even further. Moreover, we believe that specific reference to providing retirement homes should be contained within Strategic Objective SO2, especially as housing for the elderly is identified as a key issue in the District, see above.

Core Policy 3 – Settlement Hierarchy (Page 37)

The settlement hierarchy appears to be satisfactory. Development should be concentrated in accordance with the hierarchy and there should be a presumption in favour of sustainable development.

Core Policy 4 – Meeting our Housing Needs (Page 38)

Whilst the exact housing figures will be tested at the Local Plan Examination, we generally support this policy. However it is interesting to note that some larger villages, such as Drayton, do not account for any of the strategic site allocations. As a result, there is the very real threat that the housing figures which have to be accommodated over the full Plan period up to 2031, will not be in the most sustainable locations. This is contrary to the NPPF.

Core Policy 8 – Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area (Page 52)

We object to this policy. Whilst the number of new homes in the area for the Plan period has been identified, it is not known where some 1,696 dwellings will be accommodated. This figure will be clearly be scrutinised at the Examination in Public however, the uncertainty about deliverability is a real cause for concern.

Giving a specific example, Blue Cedar Homes have made a number of representations to the Drayton Neighbourhood Plan, via our planning agent D2 Planning, for an allocation of up to 21 no. units in the village. As set out in the settlement hierarchy, Drayton is considered a large village and a sustainable location. This site sits adjacent to a 'preferred site' in the Drayton Neighbourhood Plan and which is proposed to accommodate over 100 no. units. The Blue Cedar Homes site would merely be an 'infill' were this larger site to proceed at the Neighbourhood Plan Referendum.

Failure to get sites such as this allocated will have a 'knock-on effect' on the overall Local Plan housing numbers. If sustainable sites such as the one Blue Cedar Homes are promoting are ignored, then the pressure to find the housing stock elsewhere will increase. This in turn will have consequences for greenfield and Green Belt land.

Core Policy 22 – Housing Mix (Page 92)

We generally support the approach taken in this policy, however the role of providing housing for the elderly needs to be more positively recognised within the Vale of White Horse Local Plan 2031. The policy should explicitly encourage the provision of retirement housing. In turn, the issue of elderly people being over-housed in properties which are no longer practical should also be addressed.

In summary, if this were included, it would be in accordance with the overall objective of achieving the creation of more balanced communities.

Core Policy 23 – Housing Density (Page 93)

Whilst we fully support making efficient and best use of land, we feel that the minimum density of dwellings per hectare should not be stipulated. With specific reference to homes for the elderly, communal areas of on-site open space are more likely to be provided. This often results in a lower density especially if houses, rather than flats and apartments, are proposed. As such, we feel the policy is too prescriptive and does not address the role of housing for the elderly.

Core Policy 24 – Affordable Housing (Page 94)

We object to the Affordable Housing policy as currently worded. During the six week consultation period of the Vale of White Horse Local Plan 2031 – Strategic Sites and Policies, the Government have issued guidance, set out in the National Planning Policy Guidance (NPPG) document, dated 28 November 2014. In the guidance the Government state 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 [including]

- ***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***
- ***in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty”***

As such, this very recent guidance should be taken into account in the draft Plan and set out within Core Policy 24. Furthermore, para 6.11 of the supporting text to Core Policy 24 should be deleted. This paragraph effectively says that the Council would not take an extant permission into account when determining an application. This runs contrary to established case law and should therefore be erased.

Whilst the affordable housing requirement should be amended in line with the NPPG, the policy should also acknowledge that where a proposed development addresses a specific local need, such as retirement housing, it may be appropriate to seek an alternative to onsite provision through, for example, an offsite financial contribution.

Separate representations have been made to the Vale of White Horse District Council – CIL Preliminary Draft Charging Schedule Consultation which is also currently taking place.

Core Policy 26 – Accommodating Current and Future Needs of the Ageing Population (page 98)

As previously mentioned, Blue Cedar Homes welcome specific Local Plan policy, which recognises and acknowledges the ageing population. The policy could be taken even further.

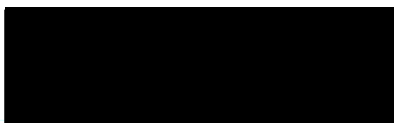
I strongly believe that specialist accommodation, such as retirement housing, should have its own separate development scenario and not be amalgamated into a general, residential category as set out in the requirements of Core Policy 24 (Affordable Housing).

Specialist accommodation is not like conventional housing – factors such as higher build costs and a longer selling period for our properties make retirement housing less viable than new homes in general. Therefore, it is imperative that when wording a policy relating to accommodating current and future needs of the ageing population, these very important matters are considered.

Indeed, whilst not specifically recognised in any policy, providing specialist retirement housing will result in family housing that is currently occupied by elderly people, being 'freed up' and becoming vacant for younger families.

I trust the above comments can be considered in the preparation of the Local Plan 2031. Please will you keep me notified of developments throughout the Plan preparation process?

Yours faithfully

A black rectangular box redacting the signature of Simon Tofts.

Simon Tofts
Planning Manager

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