

VALE OF WHITE HORSE LOCAL PLAN EXAMINATION

MATTER 12 – DISTRICT WIDE POLICIES

12.1 Are the policies relating to the presumption in favour of sustainable development and building healthy and sustainable communities soundly based?

(d) Affordable housing

The HBF considers that the Council has taken a sensible approach in providing for affordable housing needs on the one hand while balancing this against the need to ensure that development is viable over the plan period. This is reflected in the Council's decision to have regard to the evidence in its *Local Plan Viability Study* and to lower the affordable housing target from 40% to 35%.

It is curious that Monks Farm and Crab Hill continue to be unviable even when zero rated for CIL but at a rate of 35% affordable housing. We note table 3.1 of the CIL Viability Study, October 2014. This does suggest that viability improves if a lower rate of affordable housing is set in these two strategic locations.

(f) Accommodating Current and Future Needs of the Aging Population

We refer to our representations. Given the date that the local plan was circulated for consultation which predated the outcome of the Government's *Housing Standards Review* it will be necessary to clarify the Council's intentions in connection with expecting applications for residential development to comply with the Lifetime Homes standard. Core Policy 26 requires that all new homes are built to Lifetime Homes. Lifetime Homes has now been replaced by the optional technical standard of Part M4 (2) and Part M4 (3). Even though the Council has tested the cost of complying with Lifetime Homes in its *Local Plan Viability Assessment*, October 2014 (see paragraph 7.5) the costs modelled would not reflect the cost of building to Part M4(3).

Secondly, the section of the NPPG dealing with the optional technical standards, also requires the Council to satisfy various other tests before it can adopt the Part M standards as local policy, such as necessity and the adaptability of the existing stock. The Council has not addressed these tests. Lastly, the Council would need to provide clarity as to how many of the new dwellings would be required to comply with Part M4 (2) and Part M4 (3). The NPPG clarifies that Part M4 (3) can only be applied to the affordable housing element.

12.3 Are the policies relating to protecting the environment and responding to climate change soundly based?

(d) Sustainable design and construction

Paragraph 6.101 of the local plan states that the Council does not intend to set policy standards for the Code for Sustainable Homes. This is welcome and reflects Government policy (the *Written Ministerial Statement*, 25 March 2015). We note that

the Council intends to adopt the tighter water efficiency optional standard in its part 2 local plan.

(e) Renewable energy

We refer to our representations.

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