

Part B – Please use a separate sheet for each representation

Name or Organisation: Planning Prospects on behalf of Persimmon Homes

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. 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.

The approach to meeting housing needs by including a policy relating to affordable housing is generally supported. Most affordable housing in the Borough is likely to be delivered by the private sector through a percentage provision on housing sites. The policy sets a contribution of 40% on sites over 0.5ha or 10 dwellings.

The general definition of what constitutes affordable housing within Criterion 1 of the policy is supported, although to align with Government Policy in Annex 2 of the NPPF it should also extend to include Discount Market properties sold at 20% below local market value. Consideration should also be given to some future flexibility to also recognise the future introduction of the First Homes initiative. It is also unclear as to whether Criterion 2 means that the Council's definition of affordable housing is expected to change in the updated Meeting Housing Needs SPD. The use of an SPD is to expand upon Policy within the Plan, not to create new policy. The SPD could be a helpful tool in ensuring that the provision of affordable housing within the Borough appropriately and flexibly responds to needs over the full 16 year plan period which is most likely to vary over time. It is not clear as to which elements of the policy the SPD will be changing. To provide some certainty in policy, it is our view that the policy should define what is meant by affordable housing. However Criteria 6, 7 and 8 which define the tenure split, required social rented and shared ownership house size proportions should be more appropriately set out in the SPD which can better respond to varying needs over time.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each 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 definition of affordable housing within Policy P4A under Criterion 1 should be extended to include Discount Market properties sold at 20% below market value.

Criteria 6, 7 and 8 should be deleted and should be addressed and included in the future SPD

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The representations here (and others on behalf of Persimmon) set out a numbers of technical matters which would require more detailed explanation to the Examining Inspector in order to explore the extent of the issues of concern.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

10/12/20