

Submission to the Government in response to the public consultation on ‘Fixing our broken housing market’ by Robert Courts MP

Background

1. I welcome this White Paper, which is a significant contribution towards providing the homes that this country requires, at affordable cost, but whilst protecting existing communities.
2. I represent the constituency of Witney, the boundaries of which are contiguous with West Oxfordshire District Council, the local authority with responsibility for housing and planning delivery.
3. West Oxfordshire District Council (WODC) have an emerging Local Plan, due for examination by the Local Plan Inspector in May and July 2017. Subject to the conclusions from this examination, WODC may be able to adopt the Local Plan in Autumn 2017.
4. In the Oxfordshire Strategic Housing Market Assessment, West Oxfordshire was identified as having a housing requirement of 13,200 in total, by 2031, the end date of the emerging Local Plan. In addition, West Oxfordshire must accommodate part of Oxford City’s unmet housing need. This was determined by the Oxfordshire Growth Board in September 2016 as 2750 dwellings.
5. West Oxfordshire is a largely rural district, with significant large market towns, including Witney, Eynsham, Carterton, Chipping Norton, Charlbury, Burford and Woodstock.
6. There have been a number of large-scale speculative developments throughout the district which have faced significant opposition from residents. Many of these developments have successfully overturned WODC’s rejection, on appeal. These have related to large, national housing developers.
7. There are widespread concerns about how the area’s infrastructure will cope with large population increase. In particular, West Oxfordshire suffers from widespread congestion on its main A roads, especially the A40 from Witney to Oxford.
8. Although many residents appreciate the funding opportunities that housing developments may bring, there is broad consensus that any developments must be in keeping with existing housing standards. For example, there are a high proportion of listed historical buildings in West Oxfordshire and the many of those dwellings are built from local Cotswold stone.
9. West Oxfordshire has a thriving tourism sector, which relies on the preservation of the character of its towns and villages.
10. Containing part of the Cotswold Area of Outstanding Natural Beauty (AONB), and bordering the Oxford Green belt, most residents strongly want to preserve the wildlife and character of this ecologically significant part of the country.

Chapter 1 - Planning for the right homes in the right places

Getting plans in place

10. I fully agree that plan-making remains slow, expensive and bureaucratic. My own constituency is an example of this: due to a dispute about the number of houses required, West Oxfordshire’s plan has been set back by approximately 18 months, and is not yet

fully implemented. Whilst it may sometimes be necessary for the Department to intervene to ensure that plans are in place, so that communities are not disadvantaged by unplanned growth, this does tend to the suggestion that local authorities are wholly to blame for this, when in fact the complexity of the plan process, and evidence required to discourage appeal from developers, is more to blame. I must stress that every effort needs to be made to encourage local authorities to produce their own plans, and only they will fully understand the needs and implications of development in their area. I would therefore advocate clearer guidance and more support for councils to create their local plan, with this measure as a last resort.

11. As a former district councillor myself, I am fully aware of the time, effort and cost involved in creating a Local Plan. I would therefore caution against the proposal to create a requirement for plans to be reviewed every five years. Specifically, in West Oxfordshire, our emerging Local Plan accounts for growth until 2031, including Oxford City's unmet need. However, due to the size of many developments, the annual target rate of house building might not be met, as a larger development will take longer to deliver. Perhaps a review a percentage of time through the length of the plan should be considered, rather than an arbitrary five year period.
12. I agree with the proposal of a Statement of Common Ground where authorities are expected to work together to meet housing requirements which cut across authority boundaries. In Oxfordshire, the Oxfordshire Growth Board is already bringing together different authorities to meet Oxford City's unmet need, due to its unique land restrictions. If other such boards are not in place as standard, I feel that this would be a beneficial proposal to ensure joined up planning, on a similar time scale.
13. I support the proposal to review that National Planning Policy Framework to tighten the definition of what evidence is required to support a 'sound' plan. Current requirements are burdensome and time consuming, using limited authority resources. In general, the plan making process needs to be made quicker and more responsive, in order for authorities to be in a strong position to stop unplanned growth that does not appropriately fulfil local needs.
14. I support the need for a clear methodology in identifying housing requirements, and await the further consultation on options for producing a standardised approach. In my constituency, the experience has been that the current Strategic Housing Market Assessment (SHMA) methodologies can produce high housing need figures, beyond demographic needs. This might not be deliverable for local authorities and be an unnecessary burden. If this is the case, further evidence needs to be given to justify higher figures. Examples of development in Burford recently give a good example of where the public do not accept that the numbers alleged are necessary.
15. For areas such as Oxfordshire where a calculation has already been made for SHMA and is the base of local plans, an April 2018 implementation of the new methodology could be disruptive. I would urge for a transitional measure to be put in place to allow for the differing projection from the new methodology to be incorporated.
16. Transparency in the planning process should always be prioritised, and so I agree with proposals to improve the availability of data about contractual arrangements used to control land and wider interests in land. However, this must not be at the detriment of the privacy of individual land owners. I would not want this information to be used by large developers to put pressure on land owners to sell for development.

17. **Question 1.** I support the proposals on strategic policies to allow flexibility in the circumstances of combined authorities. The most important point is that the local plan process is extremely time-consuming and so I support the proposed tighter definition. The absence of the same has led to delays in adoption of a plan in West Oxfordshire: the plan process must be made much simpler and far quicker.
18. I would however suggest that para 156 is expanded to refer to design and aesthetic; local residents are particularly concerned that development be carried out sensitively, in accordance with local character, and with appropriate respect for design, the environment, including biodiversity: what is commonly called “placemaking.”
19. **Question 2.** Examinations are currently forums that are dominated by well-funded national developers who are able to “out-gun” local councils. Examinations are therefore dominated by developers, with input from the public severely restricted. This is undermining public confidence in the planning process. There should be greater opportunities for the involvement of well-run, well-researched and knowledgeable local groups (there is an excellent example in Bampton in West Oxfordshire, who make practical, constructive and helpful interventions but have recently not had their efforts adequately recognised and rewarded,) with the Inspector making greater efforts to ensure balance between local Councils and the public on the one hand, and developers on the other, whose views are currently in the ascendant.
20. **Question 3.** Agreed that local authorities ought to have clear policies for addressing the housing requirements for those with particular needs.
21. Further, a standardised, simpler approach to assessing housing requirements is welcome in theory, but is difficult to analyse in the absence of further detail of how this would be achieved.
22. Currently, there is a concern that the current SHMA methodologies tends to produce excessively high housing need figures, which produces an unrealistically high level of projected housing need, and which also makes deliverability difficult. This of course has the self-perpetuating effect of encouraging speculative developments and appeals by developers, when the local authority, “set up to fail”, is unable to achieve these targets. If housing need projections are significantly in excess of demographic projections, then there should be a more robust evidential basis than is currently required.
23. Standardised methodology must not be loosely drafted so that developers – in whose interests lie an increase in a local authority’s housing needs – to be able to delay plan-making progress by arguing that there is some cause for deviating from the standard methodology.

Making enough land available in the right places

24. **Question 4.** West Oxfordshire is an overwhelmingly rural district, and development density must reflect this. If an area of land is available, the landscape and infrastructure may mean that land use maximisation is not appropriate. The overall proposition is reasonable, but with that significant caveat. The emphasis should move away from “how many” to reflect “how” and must value place creation above fulfilling of numbers.
25. Although I agree with the sentiment of maximising the use of suitable land, this must tie in with the objectives of the Local Plan. For example, in West Oxfordshire, it might not be appropriate to have the density of development implied by this statement. Not all of the land within a site can or should be built on. The green infrastructure and impact on the landscape must be managed and considered.

26. I appreciate in principle the proposal that housing requirement should be accommodated unless there are strong reasons for not doing so. However, perhaps this should not be limited to the specific reasons stated in the National Planning Policy Framework (NPPF). Other reasons might include air quality management areas, wildlife sites or emerging plan allocations. The NPPF should be amended to cover these wider range of policies to include this wider range of exceptional circumstances.
27. I fully support programmes to bring brownfield sites back into use. Unless there are clear, specific reasons for not using a brownfield site, these should be seen as a priority for redevelopment for housing. This is particularly true in rural areas such as West Oxfordshire where undeveloped countryside sites should be preserved as a priority.
28. The paramount concern is to ensure that housing is only built when the necessary roads, transport, schools and shops are in place. Too often the planning process operates the other way around.
29. **Question 5** is agreed.
30. **Question 6.** Local authorities could play a stronger role, subject to financial support from Government. I back plans to enable local authorities to dispose of surplus public sector land with the benefit of planning permission which they have granted to themselves. In order to play a more active role in assembling land for development, I share the view of WODC that the way to achieve this is through streamlining of Compulsory Purchase Order procedures, to reduce risk and delays, and providing funding support from Government. These changes might also assist in helping to capture land value which can contribute towards the necessary infrastructure.
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33. **Question 7** is agreed.

Supporting small and medium sized sites, and thriving rural communities

34. **Question 8.** It is agreed that neighbourhood plans present clear opportunities for identifying and allocating small, appropriate sites. Local people best know where housing would be appropriate and sustainable in their communities.
35. West Oxfordshire is a predominantly rural community, and the local authority wishes local villages to thrive. However, this is closely linked to the provision of rural services such as superfast broadband, local transport and the protection of local amenities such as pubs and village halls. This limits the ability of such communities to grow, whatever view the local authority might take of them.
36. The overwhelming concern in West Oxfordshire is that rural villages are at constant threat from speculative housing development, often on unsustainable sites, which does not have the consent or support of the public. The views of local people are therefore

critical, and no encouragement of local authorities to identify opportunities ought to be against the will of the public.

37. Rural exception sites are becoming harder to achieve since landowners realise a greater return can be made on the back of a speculative housing proposal; West Oxfordshire may not therefore be able to continue the good record that it has had in the past. The policy wording is unlikely to change this; the key, as with so much of planning policy, is to enable the local plan process to have real teeth so as to reduce the likelihood of success for speculative housing developments. At present, there is a real risk that communities who would be supportive of rural exception sites are so infuriated by speculative development at the edge of their villages that public consent is lost. There is simply no public support for such speculative development, which must be brought under control.
38. I do not agree that 10% of sites allocated in a local plan should be of a particular size, simply because I do not agree that Government should be prescriptive, but leave such matters to local authorities. I do agree that large sites ought to be sub-divided so as to create more opportunities for small to medium housebuilders. I would strongly support the idea of local authorities to work with developments to encourage sub-division of large sites to create more opportunities for small to medium housebuilders. In my role as MP, I have met many talented local housebuilders who would be happy to work on such projects.
39. I disagree that at least 10% of the sites allocated for residential development in local plans be of half a hectare or less. In West Oxfordshire, Oxfordshire Cotswolds Garden Village of 2200 homes will create a new settlement, and is of sufficient size to attract funding to make significant infrastructure improvements. If it is suitable for an area to deliver its housing requirement in a similar way, they ought not to be penalised. I would suggest that policy should not be prescriptive, to allow this to be judged on local circumstances. This might also serve to undermine the potential role of neighbourhood plans.
40. With the rurality of West Oxfordshire, I fully support proposals to expect local authorities to identify opportunities for villages to thrive; give much stronger support for sites that provide affordable homes for local people; highlight the opportunities presented by neighbourhood plans. I know that these changes are exactly the kind of proposals which will enable rural areas to grow, through development in keeping with the areas character and keeping its village communities.
41. However, development in rural areas requires a number of other facilities to be put in place. For example, superfast broadband delivery, public transport, accessibility to services and retaining community hubs such as pubs. West Oxfordshire has recently had significant cuts to its rural public transport services and delays to its superfast broadband delivery. These factors greatly reduce the number of sites for potential development in villages. The amount of funding unlocked by development in small, rural sites is not enough to sufficiently improve levels of services.
42. Many rural villages in West Oxfordshire have had multiple speculative housing developments, often on unwelcome and unsustainable sites. This has led many residents to be wary of any development, without the promise of improvement to public services.
43. I am wary of greater use of Local Development Orders and area-wide design codes, as my district council feel that this would prove to be overly bureaucratic and inflexible. West Oxfordshire has a strong record of delivery of small sites, through planning applications, and so perhaps this is a less cumbersome way of handling small-scale sites.

44. **Question 9.** The concept of garden villages is potentially very promising, since it offers the opportunity for necessary development to be planned and provided in new settlements with the required infrastructure, rather than parceled out among smaller settlements which are overwhelmed by housing numbers that are not supported by local people and where there is no infrastructure to cope.
45. It is however essential that any such high-quality development is supported through early infrastructure investment to help speed up delivery. It is logical to build the infrastructure first which the new development will rely upon; too often, either by design or default, the reverse is the case.
46. **Question 10.** Although I fully appreciate the need to keep Green Belt land intact wherever possible, I am concerned that these changes might serve to make it more difficult to release Green Belt for development, even when the evidence base indicates this is the best and most sustainable option. By stating that authorities must ‘demonstrate that they have examined fully all other reasonable options’, this places a large burden on authorities and may serve to become an unnecessary roadblock. I am satisfied that the current exceptional circumstances test is already sufficiently tough, and I am not convinced that further strengthening it would aid housing delivery in Oxfordshire.
47. Oxford is restrained by a very tight Green Belt. Collective work through the Oxfordshire Growth Board has demonstrated that certain Green Belt sites on the edge of Oxford provide very sustainable development options. It seems illogical to rigidly enforce a green belt that contains sustainable locations (near railway stations, roads, buses,) and then to push that development into neighbouring rural areas that do not enjoy the same advantages. In both cases, countryside is lost, but in the latter case, an unsustainable settlement is created.
48. Although this policy approach may be appropriate in other locations, perhaps there ought to be more flexibility to allow Green Belt policy to be more locally influenced.
49. Of course, I strongly agree that where land is removed from the Green Belt, local policies should require the impact be offset, through compensatory Green Belt extensions elsewhere. A site’s landscape and environmental value, and links to existing public transport, walking and cycling connectivity should be given particular weight. In all cases, I would want to see better interconnected public transport, and especially built-in provision for cycling.
50. In any event, the use of appropriate brownfield land must always be the first option.
51. **Question 11.** I do not consider that there is a need to strengthen the tests local authorities already have in respect of amending Green Belt boundaries.

Strengthening neighbourhood planning and design

39. **Question 12.** Although I welcome plans to strengthen support for neighbourhood planning groups, I am wary of granting access to housing requirement figures until after the public consultation on a new standardised approach to assessing housing requirements is complete. As these figures may be subject to change, it is not helpful for this information to be released until after this is clarified.
40. I appreciate the idea behind design expectations in neighbourhood plans following consultation with local communities. Particularly where significant development is planned in existing historic settlements, it is important for any new housing to be in keeping with the current aesthetic. Too often, we have seen villages disfigured by

developments that (even if they are not undesirable on other grounds,) bear no resemblance to historic neighbouring buildings.

41. However, design codes are technical documents which are expensive to produce and so, unless more support is given, are currently unlikely to be adopted by most neighbourhood plans.
42. I agree that local authorities should be able to look to widely accepted design standards, however the decision whether to implement this must be retained at the local level.
43. **Question 13.** The white paper states that changes to the NPPF should address the particular scope of higher-density housing in urban locations. However, this should not apply to rural sites where a lower-density of housing might be required. For example, the landscape setting of settlements needs to be carefully considered, which may require landscape buffers within a site, and the retention of existing landscape and biodiversity features. There is a danger that the proposed changes could result in inappropriate densities in rural sites and on the edges of settlements: there must not be “cramming” where overly large developments are squeezed into sites that are not really big enough.
44. Changes in national policy should focus on urban locations which are well served by public transport. Densities should reflect the scale of the settlement and its role in the settlement hierarchy.
45. Again, it is critical that the emphasis is not placed purely upon numbers, but upon reflecting the nature of the place where development is occurring.
46. 13(c) contains one of the most important clauses in the white paper: the density and form of development must always reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs. This is a welcome emphasis, with the above caveat: it is important that doctors, schools, dentists, play areas and transport are all considered in practical terms, as well as the aesthetics to ensure that a development is not out of place with its surroundings.
47. **Question 14.** Circumstances, even among urban areas, vary considerably, and so I would caution against an indicative minimum density standard. Examples of best practice and additional guidance might be more helpful to local authorities.
48. **Question 15.** I feel that the best way to address the potential for delivering additional homes using existing public sector sites is through Local Plan policies. The redevelopment of sites in urban locations needs proper consultation through the planning process, rather than an extension of permitted development rights, for example.

Chapter 2 - Building homes faster

Providing greater clarity

49. **Question 16.** One of the major gaps in the White Paper is the absence of clarity as to whether the new housing delivery test will replace or complement the existing five year housing land supply / presumption of sustainable development. This land supply test causes great public resentment in West Oxfordshire, both with organisations and residents.
50. It is important for Local Plans, where adopted, to not be considered out of date for at least three years. These plans take considerable time and resources to create and the whole process would be undermined if they are considered out of date too quickly. West

Oxfordshire District Council cite a number of examples where Planning Inspectors have ruled that a plan is out of date within months of adoption, which clearly undermines the whole process and wastes the significant money invested.

51. I agree with the option of a one year agreement on housing supply, where a 10% buffer could be used, to reduce the scope for debate. However, there needs to be a proportionate process to agree a one-year assessment if this is to work and not be an extra burden. The test by the Planning Inspectorate should focus on whether the approach used by the authority in establishing the land supply position is robust. There should be no need for the Inspectorate to assess the supply figure, as this could lead to variation depending on the particular inspector involved, leading to a less standardised system.
52. **Question 17.** I do not agree that it should be a requirement for neighbourhood plans to meet its share of local housing need, as this is already usually determined in the local plan. It may be difficult to quantify what a neighbourhood's appropriate share of local housing need, as this would not consider the area's overall plans. This might place an unnecessary burden on neighbourhoods, particularly where housing is being adequately supplied elsewhere in the Local Plan.
53. Where criteria based policy exists to help deliver houses, I do not feel that it is necessary for a neighbourhood plan to have site allocations to benefit from this protection. Again, this may prove to add another layer of bureaucracy where current regulations adequately cover.
54. **Question 18.** As an area where large-scale housing developers regularly appeal planning decisions, I support the introduction of a fee: there is a need to deter large developers, for whom the money spent on appeals is not a deterrent, from routinely using the pressure of appeals to overawe local councils and residents. However, this should not apply to householder developments, where they be disproportionately penalised. The fee should reflect the scale of the proposal and the appeal method. Therefore, any provision for refunds should also depend on the scale of the fee, perhaps based on a proportion of the planning application fee.

Ensuring infrastructure is provided in the right place at the right time

52. **Question 19.** I agree with the proposal to amend national policy so that local authorities are expected to plan clearly how high quality digital infrastructure will be delivered in their area. National guidance should be explicit in stating that planning conditions can be used to ensure that developments connect with this infrastructure, perhaps suggesting a model condition.
53. **Question 20.** Particularly in the Oxford-Milton Keynes-Cambridge corridor, it is important to consider housing alongside economic development and employment. This is a key area of additional development and the strategic investment in infrastructure needs to acknowledge all the related factors to its success.

Supporting developers to build out more quickly

54. I keenly back proposals to tackle unnecessary delays caused by planning conditions. Local builders have raised concerns with me about the issues caused by pre-commencement planning conditions, which I have raised directly with the Minister for Housing through a written question to the Department (Ref: 59350).
55. I further support changes to address the skills shortages in the construction industry and I look forward to learning more detail about streamlining the route into construction, from September 2019. It is promising the success that has been achieved through

Crossrail, and I hope that this approach will be appropriate more broadly in the construction sector.

Holding developers and local authorities to account

56. **Question 21.** I fully support proposals to ensure that the planning application form should be amended to include a request for the estimated start date and build out rate for housing proposals. Basic information from developers, such as actual and projected build out, should also be required, after planning permission has been granted. There are too many instances of developments taking an unnecessary length of time, at the detriment to the local community. However, the requirement for the local planning authority monitoring the Authority Monitoring Report contact needs to be proportionate.
55. I agree with the proposed requirements for developers to provide more information on their planning applications on the timing and delivery of new housing. The practice of “landbanking” is widely suspected in West Oxfordshire and causes resentment of housebuilders, particularly large ones. However, the Government must also consider further ways to reduce pre-commencement planning conditions, which prevent responsible housebuilders from starting work promptly and delivering housing numbers. It ought to be recognised that a failure to “build out” promptly is not necessarily the deliberate policy of developers (although that may sometimes be the case).
56. **Question 22 and 23.** The Government must further consider all possible ways to increase the supply of housing by small building companies. Local authorities could be encouraged to grant planning applications more favourably if carried out by small, local building companies. This would increase public consent for building work, if development brought jobs and income into the local area, along with an increased build out rate.
57. On the same note, I agree with the Government’s proposal that an applicant’s track record ought to be considered when determining planning applications. This would encourage developers to deliver schemes in a timely manner. In West Oxfordshire, we have suffered from significant delays on some important strategic sites because of developer delays in processing Section 106 agreements. At present, there is no penalty arising from poor performance, which should be rectified. Again, the practice of “landbanking” by large developers causes immense public resentment in West Oxfordshire, where no shortage of planning permissions have been granted - but the buildout rate is pitifully low. There is therefore no good reason why such developers should continue to be granted permissions if they have failed to build out those that they already have.
58. **Question 24.** If this proposal were taken forward, I do not agree that this should only apply for large-scale sites. For example, it might be relevant when considering smaller sites in conservation areas. However, this should not be used to deter new entrants, who should be treated as having a positive record until there is evidence which it counter to this.
59. **Question 25.** The proposal to reduce the timescale to implement a development from three to two years is supported, but does not go far enough. Large developers simply make a token start on a development, which is then left for years to allow prices to rise. Instead, a proposal for a “completion date” should be considered, for example, that perhaps five years (depending on size of the development,) from the date of permission being granted to completion of project should be allowed - after which time the

permission would lapse, and ought not to be renewed. This would present unscrupulous developers with a powerful incentive to do what they are meant to do - build houses.

60. **Question 26.** I agree with this proposal, as completion notices are rarely used.
61. **Question 27** is agreed.
57. **Question 28 and 29.** Although I support more comprehensive monitoring of housing delivery at both national and local levels, I have concerns about this proposed test. This places a large onus on the local authority, when they only have a partial influence on housing delivery, and many factors are beyond their control. For example, in West Oxfordshire, the Council has often made planning decisions early in the process, but progress has been hindered by the slow progress of housebuilders and landowners in bringing forward significant sites. To better gauge the performance of local authorities – if that is the intention - the test should focus on permissions granted, or approved subject to Section 106.
58. I would like clarification on whether this test will operate alongside the existing NPPF guidance, or as a replacement. I would urge for a longer transitional measure to be put in place for areas such as Oxfordshire where extensive collective work exists.
59. Similarly, I support the proposal of an action plan, but it should not solely look at local authorities actions if it is to be effective; it should also look at the actions of other key parties, such as housebuilders and infrastructure providers.
60. The test as currently phrased treats local authorities as if they have sole responsibility for housing delivery; housebuilders have greater responsibility for actual delivery of permissions, once granted.
61. **Question 30.** The most helpful means of support to local planning authorities to increase housing deliver in their area would be through the Homes and Communities Agency, to help bring forward major sites either through advice or funding.
62. Linked to the pressure on local communities by speculative development, is the significant Council resources that are being diverted to handle inappropriate speculative development and corresponding high level of appeals. A plan led approach is the only way in which Council resources can be targeted on the sites that the Council supports; only in this way can we get beyond a reactive approach to planning and deliver the homes that are needed, but in the right places.
63. Government help to resist speculative developments, resulting in a more robust plan-led process, would be of enormous assistance.

Diversifying the market

64. This chapter in the white paper does not have a specific section in the consultation questions. I have therefore included the below comments.
65. The cost of housing can be addressed by innovative thinking: offsite building, self-build, and innovative models carried out by forward-thinking Conservative District Councils such as those in Oxfordshire.
66. The Government's intention to support SME builders is wholeheartedly supported. There are many located in my constituency, who are working hard to create development in keeping with the local area. Indeed, many are family-run businesses who have

personal ties to the area over many generations, and so take great pride in building development which are to the benefit of the community.

67. Further, the Government must consider further support for offsite building companies, which can provide quick, cheap homes in a high quality that is a far cry from the “prefab” image of popular imagination. By building timber frames off-site, companies can complete builds much more quickly, and are appropriate in cost to be sold as affordable housing.

Chapter 3 - Affordable Housing

68. **Question 31.** I agree with the proposed new definition for affordable housing to purchase, as this is something which should be encouraged. However, in West Oxfordshire, there is a significant need for more social and affordable rented housing and so the proposals do not alleviate all our concerns.
69. There is also the danger of confusion given that many of the products appear to overlap. It might be difficult to implement an income cap for starter homes, as wages and house prices will significantly vary across the country. If a blanket cap is introduced, in lower value areas, some households could receive the Starter Homes discount where their needs could be met in other ways within the housing market.
70. The definition of affordable private rent housing must make clear services charges are included. This definition could be read as meaning housing with a 20% market discount, then add the service charge, compared to affordable rented housing definition which explicitly states it is a 20% discount on the market rate including services charges. The latter is much more affordable for households in need of such accommodation.
71. I agree with the transitional period which aligns with other proposals in the White Paper (April 2018.) However, I would press for clear transitional guidance to be put in place, to ensure that these are nationally introduced in the same way.
72. **Question 32.** The difficulty with this proposal is that currently, the NPPF requires local planning authorities to use their evidence base, created for the Strategic Housing Market Assessment, to develop policies in their Local Plan that caters for the identified housing demand and the scale of housing supply necessary to meet this. A nationally set percentage might mean that some local authorities will be required to provide affordable homes in excess of the number of products actually required for their area.
73. Different housing products must be offered to meet the aspirations of many households, however, this should not be at the expense of other types of affordable housing if the local demand for starter homes is low.
74. It is important that if the local authority is required to secure 10% of all homes on individual sites as affordable home ownership products, then access to the relevant starter home and home buy registers is needed to ensure that what is secured is what is required.
75. If this 10% figure is used, it should be locally flexible to set the site threshold through Local Plans. If there is no Local Plan in place, perhaps a 10 dwelling unit threshold would be sensible.
76. **Question 33.** I would strongly advocate flexibility in this policy, to enable local authorities to be able to determine when commuted sums rather than onsite provision should be provided. Supported housing schemes should be exempted from the 10% regulation, to provide affordable home ownership products in a flexible manner.

77. A further exception to consider are rural exception sites. These are small scale and designed to meet a locally identified need with homes that are affordable, and are allocated to people with a local connection. If these were included in the mandatory requirement, this might hinder future delivery of such exception sites.

Chapter 4 - Sustainable development and the environment

78. **Question 34.** I support this proposal to clarify the Government's view of what sustainable development means for the planning system in England.

79. **Question 35** is agreed.

80. **Question 36.** I support these proposals, as flood risk is an important planning issue which needs to be carefully addressed by planning new development. West Oxfordshire has historically serious issues with flooding, most recently in 2007. Although a number of measures have been undertaken to decrease the flood risk in our area, these changes to the NPPF will complement this work.

81. **Question 37.** Noise and other impacts of new developments on existing communities must be taken into account, and so I support these proposals. Reasonable measures should be taken to mitigate this impact, but also to mitigate the impact of existing businesses and organisations on new developments. Inappropriately sited and designed residential development can undermine legitimate established businesses.

82. **Question 38.** I support this proposal, and agree that no transition period is needed.

Conclusion

83. It is important that the Government consider:

- a) bringing in strengthened policies to fight against cramming of excess numbers into unsuitably small sites;
 - b) bringing in strengthened policies to provide more infrastructure so that housing is only built once the necessary roads, public transport, schools and doctor's surgeries are built, rather than the latter trying to catch up with the former, often many years later;
 - c) bringing in strengthened policies that are sustainably "green" wherever possible. It is cheaper to build provision of renewable energy into developments at the planning stage, rather than seeking to retro-fit on an *ad hoc* basis later;
 - d) the methodology by which housing numbers are calculated, to ensure that there is not an exaggeratedly high number demanded in rural areas;
 - e) the introduction of policies to ensure that any developments are in keeping with existing areas in aesthetic terms;
19. Overall, the focus ought to be moved from "how many" to "how" with appropriate infrastructure, and from numbers and development onto the establishment of places, maintaining good design and local character. Only in this way can the consent of local people to development be maintained, whilst providing the numbers that are needed to address the cost of housing.