

**OXFORD**  
CIVIC SOCIETY



SHAPING OXFORD'S FUTURE

**OXFORD CIVIC SOCIETY**  
**RESPONSE TO THE**  
**HOUSING WHITE PAPER**  
**“FIXING OUR BROKEN**  
**HOUSING MARKET”**

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Dept of Communities and Local Government

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## INTRODUCTION

In formulating this response to the public consultation on the government's Housing White Paper we have assessed the paper under eight headings:

1. General
2. The Planning System
3. Green Belt
4. Affordability
5. Land Value
6. Alternative Models of Housing Delivery
7. Forms of Tenure
8. Quality of Design

Our comments address the issues raised in the White Paper, and where appropriate we comment on matters that are particularly pertinent to Oxford and Oxfordshire. We have included references to any relevant question numbers in the Questionnaire accompanying the White Paper.

### 1. GENERAL POINTS

- 1.1. We strongly agree that the housing market is broken. The ratio of nearly 8 between median dwelling price and median income for England as a whole (White Paper, fig. 1) is unprecedented for any major economy. The market's brokenness is especially apparent in Oxford where the median dwelling price is a catastrophic 10 or more times median income, causing major problems of recruitment and contributing to systemic inequality and deprivation.
- 1.2. However, the assertion that the cause is simple (*"The housing market in this country is broken, and the cause is very simple: for too long, we haven't built enough homes."*) is inaccurate. The inadequate housing supply is a symptom of the brokenness not the cause, and the simple view overlooks a mass of evidence<sup>1</sup> that other factors – the availability of finance, the attractiveness of property relative to other forms of investment, the inequality of wealth and incomes, the incidence of taxation – have all contributed to the continuing, and worsening, crisis of availability and affordability.
- 1.3. We support the objectives in the White Paper (Chapter 2) of speeding up construction of new homes – particularly affordable and key worker homes – addressing serious skills shortages, increasing productivity and improving competition in the building industry. But we consider it urgent to review these other issues as well, including a reform of Council Tax, whose regressive nature was noted in last year's report by the House of Lords<sup>2</sup>.

**The housing market is broken but the causes are not simple. We support efforts to speed up delivery but other important issues must not be overlooked.**

### 2. THE PLANNING SYSTEM

- 2.1. **General points.** Overall we consider there is too much emphasis in the White Paper on the planning system increasing the supply of houses and too little on the wider context in which

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<sup>1</sup> Usefully summarised in "Rethinking the Economics of land and Housing", ISBN 978-1786991188

<sup>2</sup> See "Building More Homes", House of Lords 2016, para 254

housing delivery is set. The planning system is principally about the use of land and has limited impact on the price of land and homes, tenure, who accesses the housing and occupancy rates. There is insufficient recognition that housing delivery is primarily developer-led where, understandably, maximising profit is the over-riding priority. It is the developers who largely control the timing of development (when planning applications are made, and after consent when it starts) and build rates.

- 2.2. We are particularly concerned that in assessing the viability of development proposals the primary variable is currently taken to be the price paid for land. As a consequence, the provision of affordable housing, infrastructure and community facilities very commonly falls victim to arguments of viability, with the land value cited as being so high as to preclude such provision. The White Paper does not address this issue nor make clear why site value and land prices should not be established by residual valuation. A clear policy on the primacy of Local Plan policies over notional land values would correct this anomaly.
- 2.3. If this were to discourage development, and given the imperative of addressing the growing catastrophe of housing affordability, the powers of compulsory purchase at realistic prices should be strengthened.
- 2.4. There is also insufficient recognition in the White Paper that the location of housing should be linked to employment opportunities; solving the chronic problems of housing will necessitate not just building the right numbers of homes, but doing so in the right places, both within Local Authority areas and across boundaries, reflecting the availability of employment, and ensuring that efficient public transport facilities are, or can feasibly be, put in place to connect homes to jobs.
- 2.5. A major problem with planning in Oxfordshire is the lack of a strategic, long term plan for this functional economic area which coordinates the sustainable provision of housing, employment, transport, and social and community facilities across five different planning authorities. In Oxfordshire, it is very clear that, to date, the Duty to Cooperate has not delivered this essential strategic planning across the region, even though there is agreement on the Housing Market Area. The production of Local Plans and the planning of infrastructure is uncoordinated and unsynchronised.
- 2.6. The need for proper cooperation between the six Local Authorities in Oxfordshire is quite evident from the geographic, population and employment characteristics of the county. Oxford City's population is 23.5% of that of Oxfordshire; it provides around 29% of jobs in the county<sup>3</sup>; yet it occupies only 1.75% of the county's area. The consequence is that Oxford has an assessed unmet need of around 15,000 homes in the period to 2031, and has a daily inward-commuting population of 46,000 – approaching half the workforce – leading to significant traffic congestion.

## In Oxford

The Districts, City and County have failed to deliver a co-ordinated approach for housing, employment and transport to support economic development. Oxford City cannot do this by itself.

A Statement of Common Ground will not break the current stalemate.

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<sup>3</sup> ONS Census 2011

- 2.7. We are particularly concerned that Oxford’s unmet housing needs will fail to be met effectively until a strategic, long term forward plan for this functional area is in place. We consider it unlikely that the proposed Statement of Common Ground will add more teeth to the duty to cooperate.

**Under the current planning system the price developers pay for land determines the viability of affordable housing, leading to too little being built. The White Paper does not discuss this. Nor does it adequately cover the need to coordinate housing, employment, transport and other infrastructure.**

- 2.8. **Chapter One (Planning for the right homes in the right places).** It is a major concern that 40% of local planning authorities do not have an up to date plan, but there must be serious doubts whether the provision of additional resources for planning departments through the Housing Infrastructure Fund and the simplification of the planning process will deliver change fast enough. Nevertheless we welcome proposals that plans should be easier to produce and have clear policies to address the needs of particular groups including the elderly and disabled. It should also include local people on average incomes and below who are unable to access market housing for sale or rent.

- 2.9. The under-occupancy of family-sized homes by older households (but not elderly requiring specialised accommodation) is a concern and the government should require planning authorities to promote the development of suitable alternatives. Consideration should also be given to whether a more active policy can be introduced to support it – including tax advantages for those down-sizing.

Qs 1 - 3

- 2.10. A new standard method for objectively assessing housing need seems sensible, but much will depend upon the new method winning public confidence. It should not be used to undermine recently adopted plans that use a different methodology (Qs 1-3) otherwise the figure of 40% of local authorities which do not have up-to-date Local Plans could fall further.

Qs 4a, 7,  
8, 12 - 15

- 2.11. We welcome proposals to make effective use of suitable land, in particular suitable brownfield land in settlements, avoid low density development, encourage estate regeneration and strengthen neighbourhood planning (Qs 4a, 7, 8, 12, & 13). Minimum density standards should be set out in local plans to reflect the characteristics and opportunities of specific areas rather than being determined at the national level (Q14). While we support the more intensive use of sites in urban locations we consider this should be promoted through the NPPF and local plans, and that because of the intensive and often sensitive use of adjoining sites proposals should be subject to a full planning application (Q15).

**We welcome proposals that plans should be easier to produce. Minimum density standards should be set out in local plans. We conditionally support the more intensive use of sites in urban locations, which should be subject to a full planning application.**

Qs 22 - 25

- 2.12. **Chapter Two (Building homes faster).** We are concerned that house builders have a major incentive to build slowly to keep prices and profits rising. While increased powers to crack down on ‘land hoarders’ are welcome (Q22-25) we consider that stiffer sanctions would be

more effective - such as a land tax against developers with planning permission who deliberately postpone development.

Qs 16a, 29b

- 2.13. The requirement for a 10% buffer to agree the five year requirement for one year is unnecessarily onerous (Q16a) as is a 20% buffer on top of the five year land supply where delivery falls below 85% (Q29b). The latter could encourage developers to delay delivery to get further additions to their land banks – most likely in unplanned locations which may not be sustainable and expensive to service.

**Increased powers to crack down on land hoarders are welcome, but we consider that stiffer sanctions such as a land tax on tardy developers would be more effective.**

### 3. GREEN BELT

Qs 10a, b, f

- 3.1. The Oxford Civic Society supports the Government's commitment to protecting the Green Belt and agrees that Green Belt boundaries should be amended only in exceptional circumstances. But we believe that Green Belts provide inadequate protection; allowing a wide variety of non-housing development to take place; doing little to encourage biodiversity or to facilitate recreational activities; and doing nothing to protect many burgeoning towns where no Green Belt exists. We thus believe that Green Belts are no substitute for the inclusion of detailed policies in Local Plans, to deliver not just the five objectives originally ascribed to Green Belts but to address all these issues of inadequacy more effectively.
- 3.2. However, it is indisputable that housing to meet the economic and social needs of Oxford, particularly affordable housing, cannot all be provided within the City. We accept therefore that reviews of the Green Belt through the local plan process may be appropriate, but agree (Q10 a) that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.
- 3.3. Whilst we agree (Q10f) that *"when carrying out a Green Belt review, local authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs"* it is important that any such consideration takes fully into account why the land was designated as Green Belt and the purposes of the Green Belt, including the fundamental aim of preventing urban sprawl.
- 3.4. Where land is taken out of the Green Belt for development there is a need to adopt creative policies which enhance sustainability by, for example, being close to public transport, large enough to justify their own new social infrastructure, setting tough criteria for housing density, and incorporating 'green infrastructure' within the development. In particular we think any land which is taken out of the Green Belt should provide for a significant number of homes (perhaps in the order of 80% in the case of Oxford) that are genuinely affordable in relation to local incomes and are held as such in perpetuity by local authorities, housing associations, or other public or charitable institutions.

#### In Oxford

Oxford City cannot meet all its housing needs within the city boundaries.

Up to 80% of housing built in land taken from the Green Belt should be genuinely affordable and held as such in perpetuity.

- 3.5. We are sympathetic to the proposal that higher contributions can be collected from development (Q10 b) as a consequence of land being taken out of the Green Belt to pay for compensatory improvements to the environmental quality or accessibility of remaining Green Belt, but this should not be at the expense of significant provision being made for affordable housing and necessary infrastructure provision.
- 3.6. We support the principle that removing part of the Green Belt should result in compensating designations of land elsewhere.

**We support the commitment to protecting the Green Belt and agree that boundaries should only be amended in exceptional circumstances. Green Belts are no substitute for proper spatial planning. Removing part of the Green Belt should be compensated by designating new land elsewhere.**

#### 4. AFFORDABILITY

- 4.1. As stated above, the crisis of affordability in the UK is more complex than simply not building enough homes. Regressive property taxation, an increasing lack of diversity in housing suppliers over the last forty years, a recent culture of housing-based financialisation and a fragmented private rental sector are just a few reasons that housing costs have rocketed beyond local wages.
- 4.2. Median house prices in England are nearly eight times median wages when an affordable threshold is recognised to be three times or less.<sup>4</sup> As shown in the 2015 data (p.12 of the White Paper) there was only one local authority which fitted that description. We welcome the recognition that politicians and the housing industry have a moral duty to address this imbalance (p.11) as there is evidence of growing social and economic consequences of the crisis of unaffordability.
- 4.3. The proposal for growing the regulated institutional rental sector through the Build to Rent Programme is important. We welcome the creation of an 'Affordable Private Rent' definition within the National Planning Policy Framework (NPPF), but the level should be defined in relation to local incomes in the area rather than to local market rents, which is the proposed definition (p.100). We believe properly regulated provision of housing by employers within urban areas would contribute to a broader and more stable rental market. However, in a high-priced area like Oxford it is not a panacea, and it does not replace the need for genuinely affordable or social housing.
- 4.4. Stronger support in the NPPF for Rural Exception Sites is positive but we believe there is an opportunity for equivalent 'Urban Exception Sites' for cities with particularly constrained housing supply.
- 4.5. Attention needs to be given to lifetime running costs when determining the affordability of a home. The Affordable Homes programme should be contingent on primarily delivering high thermal performance in building stock – see our comments on quality of design.
- 4.6. We welcome greater immediate investment in the housing sector including the expanded £7.1bn Affordable Homes Programme and £300m Community Housing Fund to develop support services and add to the affordable housing stock. We do have concerns however that investment in these schemes will not be retained and there is evidence<sup>5</sup> that 'Right to

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<sup>4</sup> Cox, W., Pavletich, H., (2017) [13th Annual Demographia International Housing Affordability Survey](#)

<sup>5</sup> "From Right-to-Buy to Buy-to-Let", Greater London Assembly, January 2014

Buy' has led to the loss of substantial numbers of affordably-rented homes from the market. This policy has thus been counter-productive and should be withdrawn.

- 4.7. There should also be an awareness that previous programmes like Help to Buy have inflated prices, pricing out greater numbers of people by prioritising higher earners<sup>6</sup>.
- 4.8. The key concern in Oxford is the lack of affordable housing with median house prices standing at over 10 times median local incomes. This inevitably leads to long distance commuting with its associated problems of congestion and pollution, and difficulties for public and private sector employers to attract and retain staff.
- 4.9. The definition of affordable housing (Q31) is unnecessarily complicated. The definition of affordable rents at no more than 80% of local market rents and discounted market sales of at least 20% below local market value will be unaffordable to many people. The government must state that it will support more generous discounts than this where this can be justified.
- 4.10. If starter homes are targeted at households with incomes of around £70-80,000 they will be beyond the reach of many key segments of the population, and will add to spiralling house prices.
- 4.11. 40% of ex-Council homes sold under the Right to Buy are now in the private rental sector<sup>7</sup>. In this White Paper the Government has made it very clear that tenants of Council Housing Companies should also be eligible for the Right to Buy<sup>8</sup>, which would heavily affect the viability of the new Oxford City Council housing company. We believe this to be counter-productive.
- 4.12. Charity Law guidance on the disposal of assets (not referred to in the White Paper) does not provide trustees with the confidence to act in the best interest of the wider community when disposing of land. In high demand areas like Oxford this results in land being sold for prices which prohibit the delivery of affordable housing and low-carbon initiatives.
- 4.13. This focus on financial return ultimately affects an area's ability to retain employees (and thus employers), to provide residential stability for children and to develop thriving engaged communities. We urge clarification of the right of charities to take account of social and environmental issues and economic wellbeing in addition to immediate financial benefit when assessing 'best consideration' in disposal transactions. Such clarification should be included in future updates of the Social Value Act.

Q31

### In Oxford

'Right to Buy' has been counterproductive and should be withdrawn, not extended.

**The crisis of affordability is more complex than simply not building enough homes. The White Paper does not address this adequately: we discuss several other factors above.**

## 5. LAND VALUE

- 5.1. Financing the urgently needed increase in genuinely affordable and key worker housing requires that the increase in land value that is conferred by the grant of planning permission is made available for provision of such housing, and infrastructure such as public

<sup>6</sup> Financial Times (2015) [First time buyers in London still priced out despite Help to Buy](#)

<sup>7</sup> Inside Housing (2015) [Revealed: 40% of ex-council flats now rented privately](#)

<sup>8</sup> Inside Housing (2017) [Right to Buy extension to companies could reduce affordable development](#)

transport and community facilities. The existing system is estimated<sup>9</sup> to capture only around a quarter of this increase.

- 5.2. Where land values are low prior to development, as with greenfield sites, existing practice captures too little of the value uplift for the local, regional or even national benefit. Where development aims to increase the density of existing urban areas – that is, where land values prior to development are already high – the attempt to capture the land value uplift requires long and costly negotiations (typically taking 14-22 weeks)<sup>10</sup>. These negotiations impose great demands on planning departments and on smaller builders or developers, neither of which can match the resources which major development companies can allocate to such negotiations. Furthermore the uncertainties surrounding such negotiations may deter developers from undertaking viable schemes that would increase density, reduce price pressures in urban areas, and reduce commuting by putting more houses where the jobs are.
- 5.3. The existing system sets the commitment to construct social (affordable) housing as a proportion of the total volume of houses constructed. Consequently, when there is a cyclical downturn in construction of market-priced housing there is a corresponding downturn in social housing construction. It is more difficult for smaller builders to survive these troughs in construction activity, so after each trough the share of the larger builders rises. It would be better if the construction of social housing was used to offset the peaks and troughs in the construction industry's cycle, instead of amplifying them as the present system inevitably does.
- 5.4. A better solution, used in many European countries, would be to enable local authorities and public development corporations to buy land at prices based on existing-use value, and either develop it for the community benefit, or sell on specific sites (see 8.7 below). This would solve the problems noted in the two previous paragraphs, ensuring that most of the land value uplift becomes available to the wider community, avoiding complex negotiations, and allowing the resources made available for social housing to be used more intensively at times when there is more spare capacity in the construction industry.

**We must capture much more of the increase in land value when planning permission is granted and use the money to finance infrastructure and key worker housing. Building affordable social housing could be used to dampen cyclical downturns in the house-building industry. Local authorities and public development corporations should be able to buy land at prices based on existing-use value, and either develop it or sell it on for the benefit of the community.**

## 6. ALTERNATIVE MODELS OF HOUSING DELIVERY

- 6.1. We welcome the intention to broaden the means by which housing is delivered – who provides it, what is built and how it is built.

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<sup>9</sup> See “Building More Homes”, House of Lords 2016, para 144

<sup>10</sup> Ibid, para 115

- 6.2. The White Paper acknowledges the need to facilitate the inclusion and growth of smaller developers in house-building. But there should be specific reference to the community-led sector – Community Land Trusts and Co-housing as two examples - rather than just a reference to ‘other’ house builders.
- 6.3. The recent release of the Community Housing Fund acknowledges the expansion and importance of this sector. Where there are established networks of community-led housing groups these developments should be managed more directly by the groups intended to benefit. In Oxfordshire we would cite the example of the 'Housing Hub' partnership between Oxfordshire Community Land Trust, Community First Oxon and Oxfordshire Community Foundation<sup>11</sup>.
- 6.4. Accelerated construction (Chapter 2 of the White Paper) is to be welcomed, including encouraging Local Authorities and housing associations to build more affordable homes. However, the references to use of public sector sites must be balanced by the acknowledgement that the disposal/sell-off of public land for short-term financial gain may not be sustainable or strategically sound.
- 6.5. Community-led housing provision bridges the gap between public and private land ownership, by retaining the benefit of land ownership for the local community. Community-led housing also facilitates ‘custom build’ and sustainable housing styles more readily than the conventional house-building model.
- 6.6. Whilst reference is made to ‘obtaining best value for the taxpayer’, it is not entirely clear how this compares or relates to ‘best price’, neither in terms of what constitutes ‘value’, time-relationship of returns, nor capital versus revenue accumulation.
- 6.7. Specific acknowledgement should be included of the need to identify and welcome benefits other than financial (e.g. social and environmental) of different types of housing provision. A requirement to consider ‘best value’ not simply ‘best price’ should be extended to all public bodies and charities. Our previous observations (paragraphs 4.12 and 4.13) make this point.
- 6.8. Encouraging the building of more homes for rent with family-friendly tenures (e.g. para. 3.20: *“Alongside affordable homes, we need more good quality privately rented homes”* and para. 3.22 *“Purpose-built market rent also has the potential to help provide more stable rented accommodation for families.”*) must also stress the need for **affordable** rented housing.
- 6.9. Boosting productivity and innovation is welcome, but will be challenging. As a nation we seem to be slower and/or less willing to adopt or develop more innovative (and often more sustainable) methods of construction, despite experience in previous decades. Again, access to land and finance for smaller, more community-based groups would expedite this and set examples for the wider house-building sector.

## In Oxford

Oxford’s ‘Housing Hub’ is a good model for community housing projects.

Projects promoted by Homes for Oxford ([www.homesforoxford.org](http://www.homesforoxford.org)) are good examples of initiatives for community-

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<sup>11</sup> [oclt.org.uk/](http://oclt.org.uk/), [www.communityfirstoxon.org/](http://www.communityfirstoxon.org/), [oxfordshire.org/](http://oxfordshire.org/)

- 6.10. As examples of initiatives for community-led housing delivery we would cite projects promoted by Homes for Oxford.<sup>12</sup>

**We would welcome a broader range of models of housing provision. The White Paper should specifically include mention of the community-led sector. Community-led housing bridges the gap between public and private land ownership and retains the benefit of land ownership in the local community. It should also include specific acknowledgement of the need to identify and welcome social and environmental benefits as well as financial. A requirement to consider 'best value' not simply 'best price' should be extended to all public bodies and charities.**

## 7. FORMS OF TENURE

- 7.1. In Oxford there is high demand for good quality and affordable rented properties among those who are working and living in the city for 2-4 years; in both Universities, the Oxford University Hospitals NHS Foundation Trust and other teaching hospitals, in postgraduate and research posts. Additionally, there is a large key worker population on low and low-to-middle incomes, including University support staff, teachers, and those working in transport, the public sector and the health service
- 7.2. The White Paper Fig.2 illustrates the serious problem facing such people, in that 45% (with housing benefit) and 53% (without housing benefit) of annual income is being spent on rent. Additionally, the reference (para. 4.4) to *"unreasonable letting agents' fees, unfair terms in leases, and landlords letting out dangerous, overcrowded properties"* points to conditions which should not and need not apply, but are as prevalent in Oxford as elsewhere and must be addressed as a matter of urgency.
- 7.3. The proposal in the White Paper (3.23) that there should be 3 year tenancies is supported but there should also be longer tenancies made available in appropriate cases, such as families with young children. The Paper appears to propose that 3 year tenancies should apply only to new build rental properties. This is grossly inadequate given the small proportion of the total housing stock which new-build represents.
- 7.4. Systems of tenancy adopted elsewhere, e.g. Belgium, Germany and Switzerland should be examined as offering a fair balance of interests between property owner and tenant. We are concerned about a reported increase in properties being sold leasehold<sup>13</sup>, allowing regular increases in ground rent, and believe this practice should be curtailed.
- 7.5. Reform of tenure arrangements in this sector must be addressed with urgency, underlined by the statistic cited in the White Paper showing that the growth of private renting for families with dependent children has risen from 23% to 37% in the period 2003-4 to 2014-

### In Oxford

In Oxford there is high demand for high quality and affordable rented properties for people working and living in the city for 2-4 years in the academic and healthcare sectors. There is also a large key worker population in these and other sectors on low and low-to-middle incomes. The White Paper shows the serious problem facing such people with around 50% of income being spent on rent.

<sup>12</sup> <http://www.homesforoxford.org>

<sup>13</sup> "Home Held Hostage"; Home Owners' Alliance [hoa.org.uk](http://hoa.org.uk)/2017/04/homes-held-hostage-leasehold-property-market/

15.(para. 3.22). Current practice using a form of Assured Shorthold Tenancies with fixed, limited terms favours housing being seen as an investment commodity, but provides no security for the establishment and growth of families and the development of strong communities.

- 7.6. We also welcome the proposed development of shared ownership schemes (para. 4.14 and para. 4.30 et al), as well as more dynamic Housing Association and Local Authority provision (para. 3.24 et al). A wider choice of home occupancy and ownership is required, especially for those on low and middle incomes or who for occupational or other reasons need to be mobile.
- 7.7. We are concerned that Oxford's buoyant local economy will continue to keep decent homes for rent or purchase out of reach for the majority of younger families. Hence a variety and imaginative range of tenure is of great importance, genuinely providing solutions for the wide spectrum of occupiers.
- 7.8. Other measures, including local authority powers to bring into use the 'empty and unused properties' referred to in the White Paper (para. 4.4) would maximise the deployment of land and property within the city boundary. As stated in 4.11 above, Right to Buy policies are counterproductive, especially in singling out affordable homes.

**We support the proposal for 3 year tenancies, but longer tenancies should be available where appropriate. Such tenancies should apply to existing as well as new build properties. Families and communities need security to grow and develop. Those in mobile occupations also require the flexibility offered by tenancies. We support measures to bring empty and unused properties into use.**

## 8. QUALITY OF DESIGN

- 8.1. **Design quality of buildings.** The White Paper does not specifically address the matter of the design quality of the new homes it wants to see being built, but there are passing references throughout the document. These consistently call for 'high quality' or 'higher quality' housing. 'Design quality' or 'high design quality' is not defined, and it would be hard to do so for what is arguably a subjective opinion. We suspect, however that design quality is not a high priority for the volume housebuilders, and merits greater encouragement.
- 8.2. One aspect of design and construction quality is the development of homes genuinely fit for the future, where energy consumption is minimised, waste reduction and recycling are properly addressed and sustainable lifestyles are encouraged. This important aspect is inadequately discussed in the White Paper.
- 8.3. We do support the general aspiration, and agree with the proposals in Question 12 b), c), d) and e) that the NPPF be amended to strengthen local involvement in design matters. Where advisory groups such as Design Review Panels are involved, their roles, procedures and recommendations should be transparent and part of an informed public debate.
- 8.4. **Quality of the built environment.** The White Paper also mentions the quality of the wider (built) environment, with such statements as: "*The Government will also explore what opportunities garden cities, towns and villages might offer for bringing large-scale development forward in ways that ... encourage locally-led, high quality environments to be created.*" (p29 para. 1.36).
- 8.5. We are supportive of such initiatives, and were involved in consultation on the Wolfson prize-winning paper: "Uxcester Garden City"<sup>14</sup> in 2014. However, we are concerned that the

Q12b, c, d, e

<sup>14</sup> <http://urbed.coop/sites/default/files/URBED%20Wolfson%20Entry%20low%20res.pdf>

'garden' designation is at risk of becoming meaningless through attachment to any development, since no definition of what constitutes 'garden' development has been provided. The White Paper could usefully have rectified this omission.

8.6. The current planning system, although seriously flawed, delivers buildings. It does not generally deliver attractive, sustainable places with accessible green spaces, proper infrastructure, social facilities, easy and safe access to active modes of travel, and a good quality of life.

Q9

8.7. We therefore welcome the proposals in A.57, and in response to Question 9 we would welcome the creation of a Development Corporation or similar body with powers to manage future development in the Oxford city-region. Such a body should have powers to acquire land at a fair price so that the increase in value can be used to fund the necessary infrastructure.

### In Oxford

We would welcome the creation of a Development Corporation or similar body with powers to manage future development in the Oxford city-region.

8.8. **Minimum space standards.** Paragraph 1.55 (p33) acknowledges *"The use of minimum space standards for new development is seen as an important tool in delivering quality family homes."* It goes on to recognise that a 'one size fits all' approach may be counterproductive, and refers specifically to *"the high quality compact living model of developers such as Pocket Homes"*. This section concludes with: *"The Government will review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer."*

8.9. We recognise that new developments in cities and towns may need to be at higher densities than in the past. This is certainly the case in Oxford. However, while floor area alone does not determine the quality of a dwelling it is a significant, even major, consideration: the smaller the area the harder it is to provide a high quality living space. Where smaller living spaces and higher densities are being considered it is vitally important that other factors affecting quality of life are taken into account – proximity to accessible green space, openness to daylight, good transport links, energy efficiency, etc. These are matters that are best decided locally, balancing the pressure to build more homes with these other quality-of-life factors.

Q13

8.10. We therefore generally agree with the questions posed in Question 13, providing the 'flexible approach' advocated is taken within the framework of a robust, sound and sensitive planning system which allows a proper balancing of all the competing interests, both public and private.

**The White Paper does not adequately address the need for homes to be genuinely fit for the future, where energy consumption is minimised, waste reduction and recycling are properly addressed and sustainable lifestyles are encouraged.**

**We agree that the NPPF should be amended to strengthen local involvement in design matters.**

**We recognise that new developments in cities and towns may need to be at higher densities than in the past. Such matters are best determined locally within a robust and transparent planning system.**