



EYNESHAM PARISH COUNCIL

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Sent by email - TechnicalPlanningConsultation@communities.gov.uk

29 September 2020

Dear Sir/Madam

Consultation on changes to planning policy and regulations (Changes to the current planning system)

Please accept this as Eynsham Parish Council's response to the above consultation. Only specific questions have been answered.

Changes to the standard method for assessing local housing need

No comment.

Securing of First Homes through developer contributions

Q8 - Whilst First Homes clearly have the potential to play an important role in supporting first-time buyers and others wishing to step onto the housing ladder, it is essential that this is not achieved at the expense of other forms of affordable housing which have an equally important role to play but are less favoured by developers because of the lower return – social rented housing being a case in point.

Clearly the imposition of a set, national policy requiring 25% of all affordable homes to be First Homes, could artificially skew delivery towards affordable home ownership and away from rented need which may well be more critical.

Q13 – We agree that the minimum discount for First Homes should be 30% from market price.

Continued

Q14 - No. The Government's Planning Practice Guidance on viability is clear that any policy requirements should be reflected in the price paid for land. There should be no need to cross subsidise First Homes through the provision of any element of market housing. In short, the cost of providing First Homes should be absorbed by the landowner and even at say 70% of market value, the 'premium' over existing land value on many sites, in particular greenfield sites in agricultural use, will be significant.

Q15 – No, the proposal lacks clarity and would be open to much interpretation. In short, it is likely to lead to large-scale proposals coming forward in inappropriate locations simply on the basis that they are providing First Homes.

Q16 – We agree it is essential to retain the existing rural exception sites policy in designated rural areas, and not First Homes. This will allow the Local Planning Authority to continue to provide the right type and tenure of affordable housing for the needs of those rural settlements. Genuinely affordable housing, particularly social rented, is very much needed to retain low paid local workers in sectors such as agriculture, tourism and healthcare that are vital to rural areas.

Temporarily lifting the small sites threshold

Q17 – No, we are strongly opposed to the proposed increase in the small-sites threshold, even on a temporary basis. The consultation paper itself acknowledges that delivery of new affordable homes will fall by up to 20% and argues that raising the threshold would make more sites viable for SME developers and increase the pace of their delivery.

However, no evidence is provided to this effect, it is simply based on anecdotal evidence and assertion that in some way existing policy requirements for affordable housing are in any way hampering SMEs from bringing forward schemes of this scale.

The Government's practice guidance on viability is very clear that policy requirements such as affordable housing provision should be reflected in the price paid for land. On this basis, there should be no viability issue as the lower value of any affordable housing provision, should be absorbed by the landowner.

To suggest that raising the threshold for provision to 40 or 50 units will assist viability runs entirely counter to the Government's own practice guidance. The reality is that it will make little difference to the pace of housing delivery but will severely impact on the number of affordable homes delivered.

Developer contributions allow for necessary improvements to be made to community amenities and infrastructure in order to accommodate the new developments. By raising the threshold to 40 or 50 units will be detrimental to future and existing residents.

Q18, Q19 & Q20 Existing threshold levels/policies should be retained.

Continued

Extending the current Permission in Principle to major development

Q24 – No, we have significant concerns about the proposed extension of the Permission in Principle consent regime to larger development proposals.

Whilst the concept of granting Permission in Principle for sites identified on brownfield land registers and smaller sites of fewer than 10 dwellings is accepted, to open up the approach in respect of much larger sites including undeveloped, greenfield sites creates a number of concerns including the lack of a robust evidence base upon which judgements about suitability / acceptability can be made.

How can a sensible judgement be made on the suitability of a greenfield site of say 100 – 150 units when the applicant is only required to submit a description of the proposed development, the number of dwellings, the amount of any non-residential development, the size of the site and a brief description of any supporting information that is accompanying the application. The only additional information highlighted in the consultation paper relates to building heights. The proposed extension of Permission in Principle to larger schemes should work its way through the plan-making process only, allowing for local authorities to collate the appropriate evidence and for it to be scrutinised at examination before being confirmed.

It should not be applicable to major development brought forward through the development management process as to do so would present a clear risk in terms of the absence of robust supporting information upon which to make an in principle decision in respect of suitability.

Q25 – Yes, there should be a limit imposed on any non-commercial element as is currently the case with smaller sites. As currently worded, 'housing-led' could lead to a scheme which is 51% housing and 49% non-housing coming forward under Permission in Principle. Whilst this is an extreme example, it demonstrates the risk in not setting a limit on the proportion of non-residential floorspace.

Q26 – Permission in Principle for potentially large and contentious development proposals based on a bare minimum amount of information is considered reckless, unacceptable and short-sighted.

Q28 – Given the relatively rapid turnaround for a decision (5-week determination) it is vital that any such application for Permission in Principle is given maximum publicity as early as possible. This should include a site notice, a notice in a local newspaper, across social media and any other appropriate channels of communication.

Q33 – The Parish Council does not identify any benefits to the proposals. Whilst the concept of granting Permission in Principle for sites identified on brownfield land registers and smaller sites of fewer than 10 dwellings is accepted, to open up the approach in respect of much larger sites including undeveloped, greenfield sites creates a number of concerns including the lack of a robust evidence base upon which judgements about suitability / acceptability can be made.

Continued

Q34 - It is likely that landowners and developers are extremely likely to take advantage of the relatively streamlined process associated with Permission in Principle. As set out above however, the Council has significant concerns about the consideration of large development proposals through this route in the absence of sufficient, robust supporting information upon which to make sensible, informed decisions, particularly given the rapid expected turnaround of 5 weeks for a decision.

Yours sincerely

A handwritten signature in black ink that reads "K. Doughty". The signature is written in a cursive style with a large, looping 'D' at the end.

Mrs Katherine Doughty
Clerk to the Council