

3 Year Housing Land Supply Consultation Report

Oxfordshire Housing and
Growth Deal

Planning Freedoms and
Flexibilities

16/07/2018

Lisa Choi & Giles Hughes

West Oxfordshire District Council
on behalf of the Oxfordshire
Growth Board

Table of Contents

1. Background	2
2. Consultation	2
3. Executive Summary.....	3
4. Method	4
5. Representations from the general public	4
6. Representations from District and Parish Councils.....	7
7. Representations from the development industry and associated interests	7
8. 'Other' representations	8
9. Conclusion.....	9
Schedule 1 – Representations by the general public.....	10
Schedule 3 – Representations from District and Parish Councils	18
Schedule 3 – 'Other' representations	20
Schedule 4 – Representations by, or on behalf of, development industry and associated interests ..	25
Schedule 5 – Coding Index	26

1. Background

- 1.1 The Housing and Growth Deal outlines Oxfordshire's commitment to plan for, and support the delivery of, 100,000 new homes between 2011 and 2031. This ambition, for levels of housing delivery significantly above the Government's proposed standard method for calculating housing need, requires effective strategic planning across Oxfordshire, to ensure that the necessary infrastructure is delivered, and to protect and enhance Oxfordshire's natural, built and historic environment. This will be taken forward in the form of a new Joint Statutory Spatial Plan (JSSP).
- 1.2 The proposed planning freedoms and flexibilities will allow the Councils to focus on the preparation of this Joint Plan and on the associated individual Local Plans. As part of this framework, the proposed 3-year housing land supply will set a lower minimum housing land supply requirement for a temporary period while the JSSP is under preparation.
- 1.3 The 3-year land supply would be assessed on an individual District basis. It is dependent upon the Government's proposed changes to the National Planning Policy Framework and National Planning Policy Guidance, and the commencement of the Section 28 process for the JSSP. The Section 28 process covers the joint arrangements that will be put in place by the Oxfordshire local planning authorities to coordinate the preparation of the JSSP. This process is programmed to commence in July 2018. The temporary 3-year housing supply requirement will end on the adoption of the JSSP (planned by 31 March 2021, subject to examination).
- 1.4 This report summarises the representations gathered as part of the consultation regarding the 3 year housing land supply proposal, included a broad analysis of overarching themes in response to question 2 (see section 2.2 below).

2. Consultation

- 2.1 **Consultation Proposal:** *A 3-year land supply, to apply in all of the districts in Oxfordshire for the duration of the development (from commencement of the Section 28 process to adoption) of the Joint Statutory Spatial Plan.*
- 2.2 **Consultation Questions:** The consultation requested responses to the following two questions:

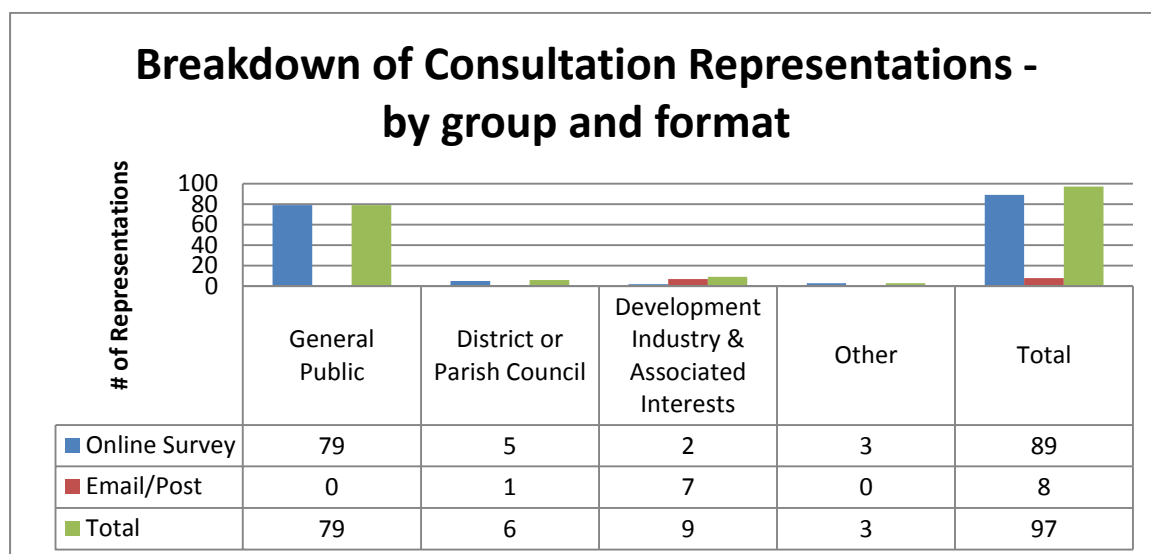
1. Do you agree with the proposed temporary 3-year housing supply requirement for Oxfordshire, which will end on the adoption of the Joint Statutory Spatial Plan (planned by 31 March 2021, subject to examination)?
2. Do you have any other comments on this consultation?

2.3 Consultation Arrangements: The 3 Year Housing Land Supply proposal was open for consultation on 31 May 2018 and closed on 12 July 2018 at 23:45 pm. The consultation was open to everyone to enable views from a wide range of interested parties across the public and private sectors, as well as from the general public.

3. Executive Summary

3.1 In total, 90 representations were gathered via the online survey and 7 representations were received separately via email. A complete list of representations received is appended to the back of this report (Schedules 1-4).

3.2 An overview of responses is illustrated in the figure below:

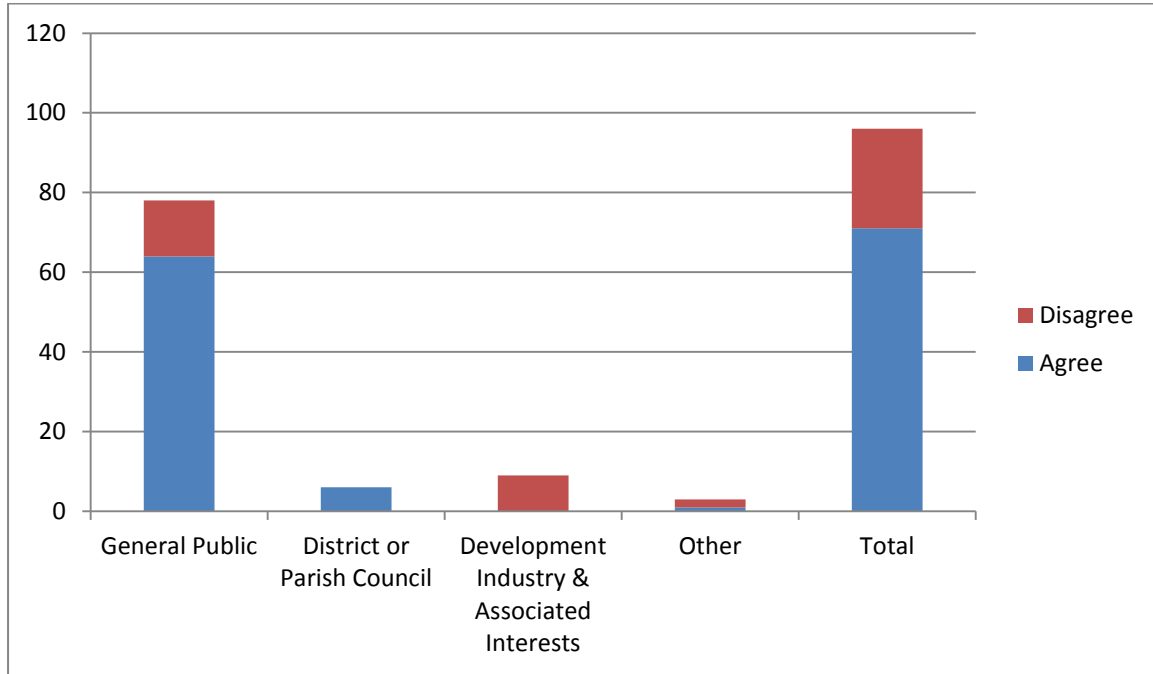


3.3 With regards to the representations received from members of the general public, 66 of 80 (82.5%) were in agreement with the proposed 3 year housing land supply.

3.4 9 representations, all of which objected to the proposal, were from, or on behalf of, the development industry and associated interests.

3.5 With regards to the responses gathered from representatives of District or Parish Councils, all 6 were in agreement with the proposed 3 year housing land supply.

3.6 Of those responses classified as 'other', one representation was submitted in support of the proposal from the Oxford Bus Company (categorised as other). The remaining 2 representations were both from local campaign groups and did not agree with the 3 year housing land supply proposal.



4. Method

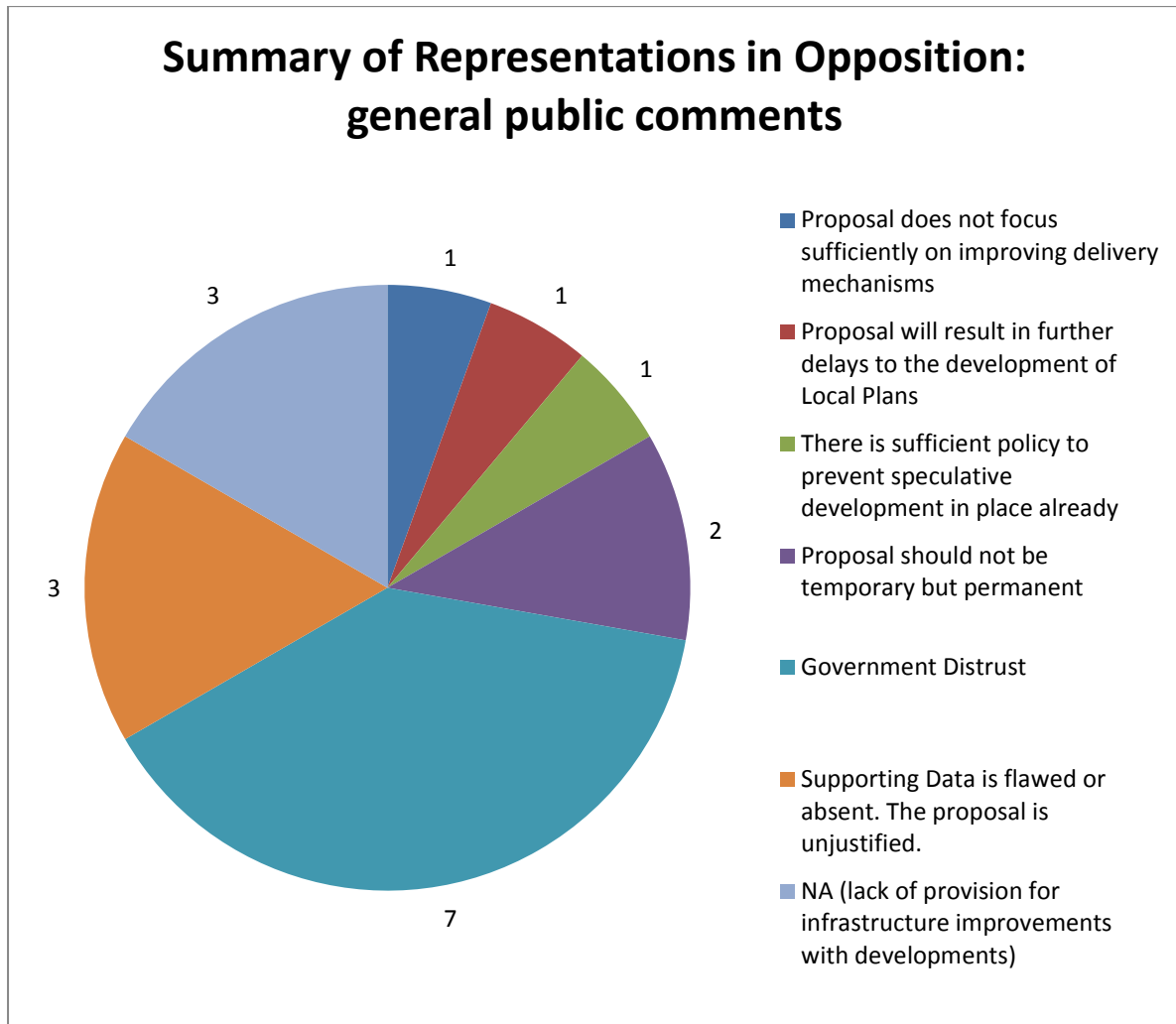
4.1 Representations were analysed using a coding matrix. The hierarchy of coding categories is found in Schedule 3. Each representation was coded for both Question 1 and Question 2. For responses received for Question 2, multiple codes may be applied to a single entry. Alternatively, several respondents chose not to leave additional comments to the consultation.

5. Representations from the general public

5.1 Of the 78 representations received from members of the general public, 64 were in agreement and 14 were in opposition to the proposed 3 year housing land supply.

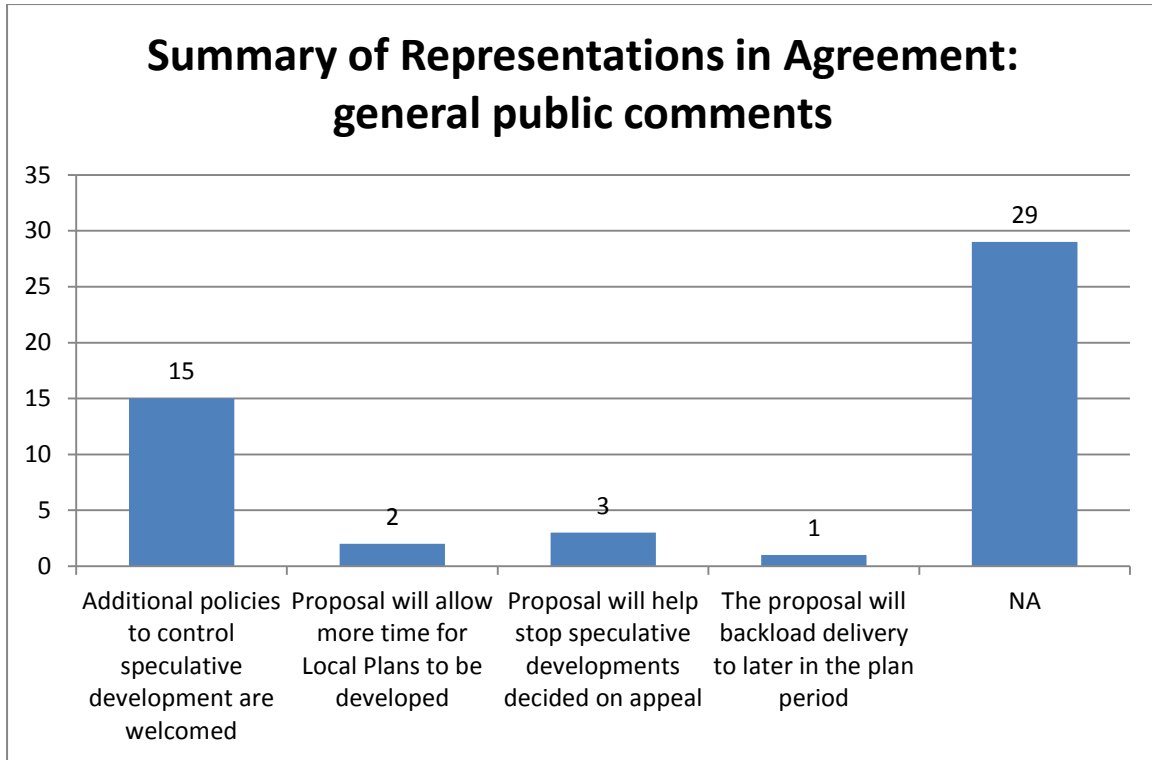
5.2 3 representations that were in opposition to the proposal did not include further comments.

5.3 11 people both opposed the proposal and left comments, the main substance of which can be distilled into 7 points, summarised in the chart below:

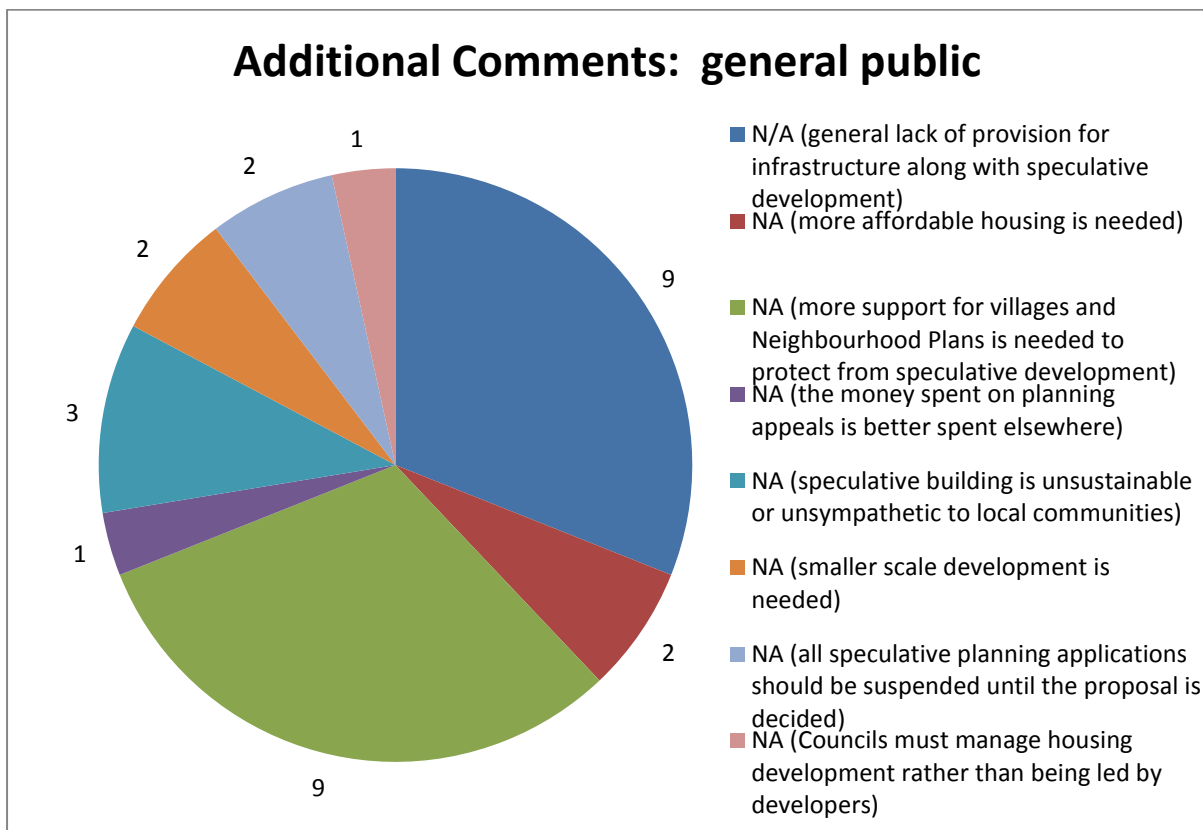


5.4 Of the 64 representations from members of the general public in agreement with the 3 year housing land supply proposal, 34 did not include additional comments in response to Question 2.

5.5 In total, 30 representations in agreement with the proposal also included comments in response to question 2 of the consultation. One of these comments includes concern for the potential ‘backloading’ of housing delivery as a consequence of the 3 year housing land supply (though the overall response was in agreement to the proposal). These representations are summarised below:



5.6 A significant number of additional comments, categorised as ‘NA’ (not applicable) above were also recorded in the consultation responses. A breakdown of these comments is found in the chart below:



- 5.7 In general, additional comments from members of the general public expressed concern and frustration over existing development in villages and rural areas. Policy mechanisms that help to control speculative development and meet local needs (including affordable housing, appropriately scaled developments, and more support for Neighbourhood Plans and communities) were noted as being especially important.

6. Representations from District and Parish Councils

- 6.1 Representations were received from:
- South Oxfordshire and Vale of White Horse District Councils
 - Liberal Democrats, Vale of White Horse District Council (VoWHDC)
 - A backbench Member of Oxfordshire County Council/West Oxfordshire District Council
 - East Hagbourne Parish Council
 - Long Wittenham Parish Council
 - Great Haseley Parish Council.
- 6.2 All of the representations received from the above list were in agreement with the 3 year housing land supply proposal. 3 of these representations were accompanied by additional comments. 2 were received from Parish Councils who justified their agreement by noting the additional protection from speculative development this would provide. More specifically, one Parish Council notes that a shorter housing land supply would help prevent Neighbourhood Plans from being undermined by the land supply figures that then grant permission to developments that do not contribute adequately to infrastructure improvements.
- 6.3 Additional comments from the Liberal Democrats (VoWHDC) further question the Growth Deal figure to deliver 100,000 homes by 2031 and note that the 2014 target is out of date.

7. Representations from the development industry and associated interests

- 7.1 9 representations from private sector stakeholders were received, all of which included additional comments. Comments were generally consistent with one another, and are summarised in the table below:

	Proposal will slow (sustainable) delivery of housing rather than improving delivery	The current 5-year housing land supply is adequate to meet housing targets	Proposal may impede the development of Local Plans and JSSP	Proposal may backload delivery to later in the plan period (possibly to unreachable targets)	Proposal may increase need in the market area rather than helping to meet it	Proposal restricts development on non-allocated sites, which some Districts rely upon to increase numbers of completions	Supporting Data is flawed or absent. The proposal is unjustified	Proposal is in direct conflict with NPPF paragraphs 14 and 49, the presumption in favour of sustainable development
Gladman Developments LTD	X				X	X	X	
David Lock Associates on behalf of 'The Tripartite' *		X	X					
Rectory Homes LTD	X		X		X			X
Savills on behalf of the 'University of Oxford & Colleges' **		X						
Persimmon Homes (Wessex)	X				X	X	X	X
Nexus Planning on behalf of CEG	X	X	X	X	X	X	X	
Barton Willmore LLP on behalf of 'The Consortium' ***	X			X		X	X	X
Terence O'Rourke LTD on behalf of Blenheim Estates and Pye Homes	X	X		X			X	X
Terence O'Rourke on behalf of Manor Oak Homes	X	X		X			X	X
TOTAL	7	5	3	4	4	4	6	5

*'The Tripartite' includes the University of Oxford, Merton College, and a private land owner.

**'University of Oxford & Colleges' includes the University of Oxford and Brasenose, Christ Church, Exeter, Magdalen, Merton, Nuffield, and St. John's Colleges.

***'The Consortium' includes Bloor Homes, David Wilson Homes (Southern), Gallagher Estates LTD, Gladman Developments, Redrow Homes, University of Reading, and Wates Developments LTD

8. 'Other' representations

- 8.1 3 representations were also received from other organisations including two from local campaign groups and one from the Oxford Bus Company.
- 8.2 The Oxford Bus Company expressed support for the 3 year housing land supply proposal. The comments include support for plan-led development that identifies sites that are able to promote, support, and deliver commercially viable and sustainable modes of transportation.
- 8.3 The Campaign to Protect Rural England (CPRE) and Need Not Greed Oxfordshire (NNGO) were both opposed to the 3 year housing land supply proposal.

- 8.4 CPRE's comments are summarised by the following points:
- The proposal demonstrates that the long-term housing delivery targets are not viewed as deliverable;
 - The whole system needs reform, not just the temporary changes proposed;
 - Proposal may backload delivery to later in the plan period (possibly to unreachable targets);
 - Proposal may increase the risk of speculative development in the long-term.
- 8.5 Similarly, NNGO's comments are summarised as follows:
- NNGO are opposed to the overall approach to development in Oxfordshire, including the principle of housing land supply rules, regardless of whether they are 5 or 3 years;
 - The growth targets for Oxfordshire need to be reassessed;
 - There is insufficient evidence to support the proposal, its justification, and feasibility across all Districts;
 - There is a risk that impossibly large shortfalls accumulate at the end of plan period and may result in increased speculative development in the longterm. NNGO do not want short-term protection at the cost of long-term 'pain'.
 - The Bespoke Housing Delivery Test as proposed may not be sufficient to address housing need and growth in Oxfordshire

9. Conclusion

- 9.1 Overall, the majority of representations received were in agreement with the 3 year housing land supply proposal.
- 9.2 Of those who objected, the main reasons were because the proposal was seen as unjustified and if imposed, would have consequences that are antithetical to its intended impacts. That is, housing delivery will be delayed, speculation may increase in the longer-term, and this will lead to market need being driven up rather than met.
- 9.3 The main reasons to support the proposal were because it is seen as a viable mechanism to control speculative development in Oxfordshire by allowing more time to develop robust Local and Neighbourhood Plans and to strengthen local Districts' position in terms of justifying/upholding decisions to reject speculative planning applications.

Schedule 1 – Representations by the general public

The representations below were all received via the online survey and are listed verbatim (identifying/contact information excluded).

Organisation you represent (if any)	Do you agree with the proposed temporary 3-year housing supply requirement for Oxfordshire...?	Do you have any other comments on this consultation?
	No	
Oxford resident	No	I find it difficult to understand why the Minister would wish to permit exceptions to national planning requirements on an ad hoc basis like this. I accept there is a need to mitigate against speculative housing development in the absence of a JSSP, however this decision would appear to send a message to planners that they are off the hook and that further delays to the development of the local plan will be tolerated. Will similar exceptions be granted to other areas struggling to plan positively for their area?
Resident	No	
none	No	There are already planning rules in place to prevent speculative planning if the councils had done their jobs properly and honestly. How can councils expect developers to respect laws/rules when councils like SODC blatantly try to breach the green belt
Myself	No	The lack of enhancement to the infrastructure of Chinnor needs to be addressed.
	No	My only comment with SODC regarding housing land supply is that the whole process is completely non-transparent, and appears to be corrupt, inept or most likely both!
	No	Chinnor has too many new developments and no improvement to infrastructure, schools etc
None	No	
	No	I live in chinnor where more and more houses are being built all the time. We do not have the infrastructure to support this. The roads are dangerous to even walk around with a small child due to the parked cars on pavements and the amount of cars that already use chinnor to get to the m40. There are two small shops and one pharmacy already under huge pressures. If better roads and facilities are put in place more housing could be an option but not as the situation stands at the moment. Living in chinnor is already very difficult due to constant building works and not what we expected when we moved to a village location and only expected to get worse with no support from the council it seems.

	No	It should be permanent, not temporary
N/a	No	priority should be to set realistic and achievable housing numbers
	No	the requirement should be permanent, not temporary. Why is Oxfordshire hell bent on building over 100,000 new homes? Just because Whitehall says so is not a valid answer.
	No	I agree that more power for decision-making should be devolved to the local authorities, but I do not agree with some of the data that is being use to make the decisions. Specifically, I think that the assumed requirement for 100,000 new houses is based on bad or no data.
N/A	Yes	
None	Yes	
Local Resident	Yes	Anything that Control's Speculative Planning of any sort is the best for the community as it adds to the local problems by Drawing in Homeowners from outside the area and does nothing to solve the Housing needs for the local population who are being driven out by the shortage of suitable Affordable housing
Myself	Yes	Fantastic idea to stop unsustainable developments being pushed through on appeal by greedy developers who have no interest in the communities they are ravaging whilst they make their millions. I sincerely hope this is implemented as soon as possible.
Myself	Yes	Planning needs tighter control, homes are getting smaller whiles developers get richer.
	Yes	
Self (parent with 5 children all needing homes one day)	Yes	Build more homes that young people can afford. That means sub £300K...
Chinnor home owner	Yes	No
	Yes	
Personal resident of chinnor	Yes	I have huge concerns that we are going to be left with hundreds of unsold houses and precipitate a slump.i do not believe the prices that the majority of these new houses are being sold for are achievable for many many people and they will remain unsold..my concern is then landlords will add to their portfolios snapping them up at reduced prices and one of the reasons these houses are being built..to enable our young people o own their own homes..Will not happen.along with this the destruction of habitat for our wildlife not even going into the failure to support and develop local services and roads for this building.we are desperate for some support as we see the destruction of our village by these builders
Member of the public and Oxfordshire resident	Yes	

	Yes	
	Yes	
	Yes	
Mr	Yes	
	Yes	Development is unsustainable in Chinnor and is ruining our community which must be stopped. It is also costing a lot of money for legal expenses at appeals which could be better spent elsewhere.
	Yes	Development at the moment is unsustainable with people making vast amounts of money that don't care about communities which must be stopped
	Yes	
	Yes	
	Yes	My wife and I moved to Chinnor when we retired 3 years ago to enjoy the "Area of outstanding natural Beauty" which is the Chilterns. Since being here our village has become a building site, with developers buying up land wherever possible and building hundreds of houses, way beyond the number allotted to us and agreed in our neighborhood plan. Please help our village being bombarded with so many new properties, the infrastructure simply cannot take it and very soon the area will become a concrete jungle and a blot on the landscape.
	Yes	
None	Yes	Needs some consolidation of existing developments it is getting out of control fuelled by greed
	Yes	
	Yes	In this particular village we already have experienced numerous developments. There are currently several which are either under appeal, or have been granted outline planning permission. Furthermore,, currently developers do not appear to have any consideration for the local environment
	Yes	
	Yes	
Oxfordshire Council Taxpayer	Yes	Local Authorities need time to develop their local plans and policies to deal with the housing issues. My village, Chinnor, is a victim of the current planning mess with numerous developments amounting to around 800 houses being approved, mostly on Appeal with reference to National Planning Policy. This is way over any expected or sustainable allocation for our village. We are currently surrounded by building and there are more developments due to be decided at Appeal in June. There is no new infrastructure planned to support these developments and despite having a Neighbourhood Plan, we seem powerless to do anything as our objections have been overruled. Local councils need time to plan properly for new building and the infrastructure to support it in order to protect the way of life in villages like mine.
	Yes	My above agreement is subject to the corresponding correct level of infrastructure and pollution controls being provided.
entirely own opinion	Yes	Time call time on on developers who exploit legal loop holes

self	Yes	
Private Oxfordshire Resident	Yes	Stop all further developments until roads, services, schools etc problems are resolved.
	Yes	
	Yes	
	Yes	
	Yes	
	Yes	
None - Chinnor resident	Yes	
	Yes	I support planned development where there is demonstrated local need and strongly disagree with speculative proposals that are not supported by Neighbourhood plans.
	Yes	
	Yes	
None	Yes	Yes. It is crazy to agree planning permissions whilst ignoring pressures on the surrounding infrastructure and the Neighbourhood Plan.
	Yes	Smaller in keeping with the local style would be better than large developments of red brick boxes with no difference from one town to the next. In filling of small sites within the villages rather than large outside in the green fields, we need to be able to farm enough land for future food requirements not cover everywhere in housing!
	Yes	
	Yes	
	Yes	As a resident of Chinnor we are being overwhelmed with developments with no regard as to how they will collectively impact our infrastructure. I think we need time for existing developments to be built and their impact assessed before more planning is granted.
	Yes	
General public	Yes	
	Yes	Given that there are many speculative applications already in the system, decisions on all such developments should be suspended until this consultation has delivered it's verdict.
		Failure to have such a safeguard will simply see the developers press on with their current and future applications to force through approvals before the verdict can have any influence on the outcome.
N/A	Yes	

	Yes	
None-(resident)	Yes	It is imperative that the districts have -and can DEMONSTRATE-a bomb-proof 3-year+ housing supply register in order to defeat developers' expensively-funded counter-charges to undermine and whittle it down and to stem the recent situation in which the Planning Inspectorate has abjectly accepted these perverse arguments. Remember, we have ALREADY been supposedly operating under a 3-year housing land supply regime for Neighbourhood Plans-which have nevertheless been circumvented in South Oxfordshire-to the detriment of the environment and to the amenity of residents.
	Yes	We must stop inappropriate speculative housing. Building expensive house in small villages with little supporting infrastructure which also require more and more people to commute on our already overloaded country roads is unsustainable. Villages need small developments of inexpensive houses for local people so that hey can remain in their own communities.
	Yes	It is critical that housing development is managed by the Councils taking into account the locations and types oh housing that are needed and not driven by developers
	Yes	Positive action required to protect and maintain our Oxfordshire village and surrounding countryside
	Yes	Chinnor's current level of new development is ludicrously high, it needs to stop
	Yes	
	Yes	
Chinnor	Yes	Leave Chinnor as a village
	Yes	Be careful with backloading.
none	Yes	We need a thorough consultation to ensure we underpin the Joint Statutory Spatial Plan for 2021
	Yes	Housing in our district has to be sustainable, proportionate to where it is build, and near to employment centres and infrastructure. Too many developments are being shoe-horned into areas that just can't deal with the increased traffic and demand on local services. Local communities are being swamped with housing which has a huge impact on the immediate area affected and the local residents. Stricter guidelines need to be in place and Neighbourhood Development Plans must be given the significant weight they deserve. Any measure that helps control speculative development is to be welcomed. Too many communities are being subjected to housing, with the only benefit being to the developers profit margins.
n/a	Yes	I agree with the changes being put forward under the proposals, as these should make it harder for unplanned speculative housing development to get planning permission, and will also allow councils to focus on preparing the JSSP and their respective Local Plans
	No	In general, I would like to see the draft proposals for the Joint Statutory Spatial Plan to be published before any relief from national housing building targets is granted. I think that is the best way to ensure the Oxfordshire councils commit to producing a plan with community backing that accurately and methodically delivers Oxfordshire's housing need. On that basis my gut instinct is to not to support the temporary 3 year land supply requirement.
		I would contest that 'speculative' housing applications are a bad thing given the need to solve the current housing crisis. Every contribution or idea should be welcomed as a contribution to the debate. If the perception is that 'speculative' proposals are not always best focused on the housing need of the local and Oxfordshire community, that is not reason to blame the developer. Make

the planning guidance and policy more helpful and constructive to encourage the type of developments you want.

You should not stop at planning tools to try and control the type of development required. Creating a suite of financial and legal tools that support developers that work with the community and councils is a much more effective way of getting the right houses built in the right place. Changing the market dynamics so that you reduce risk for cooperative developers is a much better way of delivering the goal of deterring speculative developers. These should be covered by the new spatial plan.

When you read the emerging National Planning Policy Framework (NPPF) you might conclude that it implies a element of planning panic as the government tries to force the development of housing by unblocking planning barriers. I don't think that is necessary because I am convinced the council grant planning approval to most housing applications anyway. One might conclude that whilst there are references to sustainability economically, socially and environmentally, you can, none the less, build almost anything if you stick in a few houses! Perhaps though I am wrong and what the government is trying to do is insist on more intelligence in local and neighbourhood plans. You can say no to housing if you a) can show you are meeting housing need elsewhere and that b) there is some logical reasoning behind the approach. The emerging North Hinksey Neighbourhood plan says no to housing on business sites. It justifies that because it says having housing on the site undermines one of the central productivity goals of the plan such that we do more business on the business sites. It argues that the housing need is met and discussed in its housing policies. Time will tell whether this meets the approval of the planning inspector but at least the plan attempts to express the national policy on a local basis. The only way to test whether this has been achieved ultimately is if a speculative developer presses for something different that is then successfully rejected for failing to meet the planning goals. If a speculative developer wins we need merely to tighten and/or evolve the planning guidance.

The 3 year housing land supply consultation proposal is very selective about the clauses it references in the emerging NPPF. NPPF also makes numerous statements about housing density and protection of the Green Belt. It talks about transport and commuter corridors and an integrated approach to planning and supply of infrastructure to support new or expanded communities. It specifically places a target on local planners to deliver 20% of new housing on small plots. Personally, I think the 20% target is too low and we should be able to deliver much higher numbers of houses on small plots. If we assume the bulk of these clauses will be incorporated into an agreed and released version of NPPF, then I think relaxation of the land supply target ought to be conditional on delivering against these clauses too (not just the ones mentioned in the consultation document).

I particularly think the relaxation of housing land supply should be linked to the drive to build efficiently on small plots. The council, whilst they might not be reasonably be expected to identify the number of actual small plots available today should be expected to produce a procedure and measurement system that actively encourages developers to bring small plots forward and get them built.

I consider it important not just because it is written in NPPF. If the councils and growth board are serious about considering the future of house building in the county in 15-20 years time and beyond (as stated in the para 2.2), then we need to consider what kind of delivery capacity are we going to need. I believe that in the next 15-20 years we will only see the public's resentment of green field

development where 1000 homes are built on a 10 hectare plot increase. It will be increasingly difficult politically to justify the wanton destruction of the countryside.

It is also true to say that we need to deliver against the country's productivity problems. This is a mind set issue – we must do more with what we already have. In housing (or construction) terms we have to look at improving the efficiency of land use. In the 20s and 30s the private sector built, from scratch, (the private sector house builders did not really exist in any great extent before the 1st world war – most houses were built by public works programme) about 2 million homes. They were built often with the 'dig for victory' mentality in mind with each house on relatively large plots. If we were to demolish all these houses and then to rebuild to current density expectations we would be able to substantially supply all the housing needed without the need to dig up substantial parts of the countryside. Of course, this is not a practical proposition but the 20% small plot target set by government could be met if we were to apply ourselves.

Then if we are to consider what happens after we have dealt with the current 'housing crisis' the question is will we still need a house building industry. The answer is yes because nothing lasts forever. By the time we solve the housing crisis we will have just over 30 million homes in the country. If we assume we can get the average home to last 200 years, we will on average need to build 150,000 homes a year. But this is only an average because there will be a large variation on this number. Even today we have some houses that we seek to preserve and we spend large sums of money doing so. As a result they may be 500 years old and are probably listed for one reason or another. However, we also have buildings constructed in the 60's and 70's that are being demolished and replaced for all sorts of reasons. One of the biggest issues with persevering a building is the maintenance schedule you employ. A house that has diligent owners who does timely maintenance will last a lot longer than one that does not. There will be accidents such as fires that will lead to early replacement. We also have a large variation on construction rates down through the years (in 1940 we didn't build any houses but we have built over 350,000 a year in the past). The point is that because there is a huge variation in life cycle you are very unlikely to see an entire housing estate come up for renewal all at the same time. That means you must have a house building industry capable of building on small plots. If you are content to accept that existing estates should slowly decline and decay until many of the houses are derelict before a major house builder thinks it economic to demolish and rebuild them, you can leave things as they are. I doubt that has public support. Whilst I don't think the small plot target from government is driven by this longer term objective, it is none the less the most important reason for observing it. In fact, 20% today is not ambitious enough if in 15-20 years time we are ultimately going to need a 90% plus delivery capability on small plot sites. This small plot thinking is not only relevant to local government. It is also important for the industry itself. As it stands, we have seen large number of SME developers and builders cease trading because of recession. This leaves the developers who understand and a business model based on building on green field or large plots. This is a major sustainability challenge; they are 2 separate construction models.

It is also going to be important to consider the next housing crisis that needs to be dealt with. Arguably already with us, if it doesn't get the media coverage, we will need to retrofit existing housing to be fit for purpose in the 21st and 22nd century. The big issue will be climate change but the impact of a hydrogen/electric economy (particularly for transport) will be a major task. However, I still expect that to be delivered using a small plot model – one home at a time. Certainly the small plot model is much more adaptable for

this challenge.

These are some of the main problems we face in the county and country as a whole. It is important that each council and our growth board demonstrate how the evolving delivery model will be achieved. There should be measureable and transparent targets that the community can hold local government to account. Create the process and enable the first small plots for development then perhaps you can reduce the need for a 5 year housing land supply. It would make sense to reduce land supply for large scale housing delivery, if you can show an alternative approach to solving the housing crisis and a strategy that considers how we need to change our delivery model.

Therefore, unless the councils and strategy board can demonstrate how it intends to deliver against these (and no doubt other) housing issues, I don't think it is acceptable to relax the land supply targets. We need the housing, sure, but how the homes are delivered is the most important problem to be solved.

I would encourage the council and growth board to invite local individuals and businesses to develop solutions that enable small plot development. You can encourage local people to bring forward small development options/ideas. You have to work with your communities; there is no way the councils have the resources to deliver against the general principles of this strategy. However, involving the community I suspect will be a lot more efficient and attract a lot more support from the public. Perhaps not such a bad thing to aim for!

None

Yes

Anything that will stop speculative developers would be welcome - including and ESPECIALLY opportunist developers who buy up ancient working farms in the Green Belt with the sole intention of destroying them for profit. In particular Harry Aubrey-Fletcher/Wick Farming in which instance the land was offered up for housing within 11 months of purchase. This is despite serious flood risk for existing housing, inadequate roads for access/egress, loss of access for city residents to the countryside, pollution, risk to an important SSSI and listed buildings - and many more issues. Despite all this he is still pursuing his greedy aims.

Further to my earlier submission today regarding the blatant opportunistic aims of land speculator Harry Aubrey-Fletcher - in addition to the other comments it is important to note that his aims are not to alleviate the housing problems of the residents of Oxfordshire but to use valuable Green Belt land in this area to build expensive homes for people from London - his agent in his first submission to SODC actually included the aim to address the unmet need for LONDON. However he may dress things up this is not about helping the problems of people living here who cannot afford to buy or rent - 20% off of exhortantist prices is NOT affordable. Brown field development and council/social housing is what will really address the issues.

None

Yes

Schedule 3 – Representations from District and Parish Councils

The representations below were received by both online survey and by email.

Organisation you represent (if any)	Do you agree with the proposed temporary 3-year housing supply requirement for Oxfordshire...?	Do you have any other comments on this consultation?
South Oxfordshire and Vale of White Horse District Councils	Yes	No
East Hagbourne Parish Council	Yes	We support this proposal largely because of the protection that it will give against speculative building applications and that the housing land supply target will be reduced from five to three years.
Liberal Democrats, VWHDC	Yes	We are less happy with the 100,000 houses that will have to be built by 2031 in order to achieve the Growth Deal. Not all the Local Plans for the 5 Districts have been as far as inspection let alone adoption and this 100,000 figure reflected the SHMA proposals which are now regarded as out of date.(2014)
Great Haseley Parish Council	Yes	Great Haseley Parish Council agrees with the proposed temporary 3-year housing supply requirement for Oxfordshire, which will end on the adoption of the Joint Statutory Spatial Plan (planned by 31 March 2021, subject to examination).
Long Wittenham Parish Council	Yes	The Parish Council has spent a very long period developing a Neighbourhood Development Plan which was adopted by the village with a very strong majority. Over 450 residents (out of a possible approx 700) voted in favour with only 14 against. Despite the "made" plan a speculative development was proposed in the village. We managed to get the application taken to a 4 day Public Inquiry. However despite our NDP the Inspector allowed the application largely due to the lack of a 5 year land supply in SODC which meant several policies which small villages could normally rely on were considered "out of date" . The village has being judged unsustainable in planning terms and we no longer have any public transport. The proposed development does nothing to address the poor infrastructure and will place additional burdens on traffic and local facilities without having to

contribute (other than via CIL) to anything to improve our situation.
This is a major concern for the Parish Council. We have mustered a very significant amount of entirely voluntary support to write a NDP which is seriously undermined by the land supply figures.
The Parish Council fully supports any measures to reduce this situation so that a technicality does not mean villages like us with little infrastructure are not overwhelmed by inappropriate planning applications.
It completely undermines all the efforts put in by volunteers who trusted in the Localism Act to give us more say in what happens in our community.

I am a backbench Yes
member of
Oxfordshire
County Council
and of West
Oxfordshire
District Council

Schedule 3 – ‘Other’ representations

The representations below were received via the online survey.

Organisation you represent (if any)	Do you agree with the proposed temporary 3-year housing supply requirement for Oxfordshire...?	Do you have any other comments on this consultation?
Oxford Bus Company	Yes	Enabling a 3 year supply requirement will allow for the plan-led delivery of new housing sites in Oxfordshire's Local Plans. This is particularly important as it allows LPAs to assess and compare sites' ability to promote sustainable modes of transport rather than the alternative of unplanned speculative applications in unsustainable locations where public transport services are undeliverable or not commercially unviable.
CPRE Oxfordshire	No	<p>1. Whilst it could be argued that a bespoke deal offers some degree of protection from speculative development, the better longer-term and sustainable approach is to ensure that sensible and achievable housing targets are in place.</p> <p>If our local authorities do not believe that the housing figures they are signing up to in their Local Plans are achievable, why are they being put forward? A reduction to a three year housing supply rule is merely an incentive to agree to long-term targets that are clearly not currently viewed as deliverable.</p> <p>2. No information appears to have been provided to show that this is not merely a short-term measure that will, in the longer run, actually increase the risk of speculative development.</p> <p>Whilst the proposed Deal refers to the 3 Year Housing Supply Rules, the information on the Housing Delivery Test has yet to be brought forward. In neither case is it clear what longer term tests will be applied. In particular does this mean that, if fewer houses are built in the early years of Local Plans, the figures will be backloaded to later years meaning that their long-term likelihood of failing both 3 Year and 5 Year tests will dramatically increase?</p> <p>3. The need for a bespoke deal, put forward by Oxfordshire authorities, in fact supports the case for an across the board review of these measures.</p>

CPRE believes that existing Housing Land Supply Rules and the proposed Housing Delivery Test are inadequate and punitive, and fail to encourage good planning. They unfairly penalise local authorities, who can only release land for housing but are not responsible for actual delivery, and mean that individual communities bear the brunt of speculative development when the rules fail.

The whole system requires fundamental reform, not temporary fiddling with ratios.

Change needs to take proper account of the fact that Councils (in the main) do not build the houses, they provide land on which they can be built. Developers build houses and will only build them at the rate they believe they can sell them.

This means that any system for encouraging Councils should only be based on actual need, not on Growth Strategies, especially when these are constructed around Government financial incentives to over-build. To do so is a recipe for failure and consequent exposure to speculation.

Firstly any discipline imposed on Councils should only be based on actual need (OAN), and not on housing targets, particularly where generated by Government incentives, and secondly only on Councils providing adequate land (which is in any case tested at EIPs) to meet those targets, not on actual building.

In these circumstances a five year supply may be the appropriate ratio. It is also clear that basing the discipline on need and on land supply should encourage higher density development which is, together with prioritisation of brown field, the most appropriate way to minimise loss of countryside.

Need not Greed Oxfordshire	No	<p>INTRODUCTION</p> <p>Need Not Greed Oxfordshire is a coalition of 35 local groups of people covering many areas throughout the County. We have an interest in planning, housing and other developments.</p> <p>NNGO has serious concerns about the overall approach to development in Oxfordshire and this proposal.</p> <p>NNGO continues to object to both the Housing Land Supply rules and the proposed Housing Delivery Test (HDT). They allow central government to ride roughshod over local democratic decisions and permit inappropriate developments in inappropriate places throughout Oxfordshire and the rest of England.</p> <p>The fact that Oxfordshire now needs more relaxed rules is a clear indication that the rules are inflexible, punitive and undemocratic. They do not encourage good local democratic planning as envisaged by the provisional comments from the Raynsford Review.</p> <p>SUMMARY</p> <p>In general, short-term protection seems very necessary given the excessively high target of 100,000 houses that has been set for Oxfordshire.</p> <p>But is Oxfordshire accepting short-term protection that could make things far worse in future? Will low delivery of housing in the first three years produce a 'shortfall' figure and a low HDT percentage, compounded by 20% buffering that makes PIFOSD and continuing ministerial interference inevitable?</p>
-----------------------------------	----	--

What would the point of an Oxfordshire wide JSSP plan be if that happened? The JSSP and five local plans would afford us no control, influence or protection at all.

In short, NNGO does not want short term protection at the cost of long-term pain.

If we are clearly going to struggle to meet government targets, perhaps now is the time to make that case to the government? Perhaps now is the time to rethink the excessive growth target for Oxfordshire? The government should then reconsider the position of Oxfordshire and other areas, the evidence from Letwin and Raynsford and rethink their whole approach.

What controls the supply of housing?

The government's focus on ensuring that authorities have a five-year supply of land available and the new focus on the HDT implies that local planning controls local construction rates. In practice this is not the case, as the first stage of the Letwin 'build out rate' review says. This suggests that:

- There is a 'web of commercial and industrial constraints' that hold back development. Seven constraints are listed, including limited availability of skilled labour, limited supplies of building materials and so forth. Of these, six are constraints that local authorities can do little about, but they will get the blame if building rates are low as a result. This is obviously completely unfair, as we have pointed out in other submissions.
- Builders with large sites limit construction to an 'absorption rate' which is set to avoid 'materially disturbing the market price'. In other words, Letwin is starting to expose the market failure to supply needs that has driven up house prices to the point of unaffordability. Profitability and windfall gains to landowners have been prioritised. Local authorities are held responsible for this, but they have very limited, if any, means of intervention. Just zoning more and more land will not sort out the affordability problem!

The findings by the Letwin review support arguments that NNGO have advanced in comments on other issues. The seven constraints on builders, and builders' focus on maintaining current market prices identified by Sir Oliver Letwin's review, acting together, will prevent the resolution of the affordable housing crisis. The effects are compounded by viability reviews, which are commonly used to avoid building the agreed and necessary number of affordable houses on particular sites. Local authority planning should not therefore be held responsible for the resulting failure of the market to respond to affordability problems in their areas.

The recently released Raynsford Review comments that:

'an up-to-date and deliverable fiveyear land supply is not within the powers of local planning authorities since they do not control the build-out rates of private sector companies. The evidence submitted from those in the public sector reinforced a view that in most places, most of the time, a development plan can be challenged and overturned over the five-year land supply.'

So NNGO concludes that Market forces are a much stronger influence on house building rates than the presence, absence

or quality of an all to easily ignored local plan. Market forces combined with reduction in the role of local planning, have produced the affordability crisis and we do not think they can solve it.

Problems with the existing high rate of growth in Oxfordshire

Current planning for Oxfordshire is based on a very high growth forecast and this leads to zoning vast areas of the County for development. In addition, an 'Expressway' is planned which might add even more pressure. One key risk is that the growth may not materialise. If so, the extremely penal approach adopted by central government for areas that don't meet the targets will open up even more inappropriate areas for development. Risks such as 'Brexit', 'Trump', automation, the development of a low wage Gig economy and drastic changes in the retailing sector have been recent added unexpected developments. What else can possibly go wrong by 2031?

The proposal to reduce the housing land supply required from five years to three reduces this risk, but only for a few years until the new Joint Statutory Spatial Plan (JSSP) is in place. The proposal to delay application of the 'bespoke' Housing Delivery Test (HDT) for three years after the submission of the JSSP also gives us similar concerns.

Also, we are concerned about the complete lack of justification for saying that a three-year housing land supply figure will be sufficient to avoid government interference in the local planning process. And we have similar concerns about how the transition back to a five-year target will work.

Other key risks are that:

- Development on this scale will completely change the nature of Oxfordshire and damage its attractive combination of rural environments and separate urban settlements.
- Development will only be patchy, perhaps with building starting on many sites but only completing them very slowly. So, local people will lose control of where and when development occurs.
- It is likely that the existing infrastructure, which is already worn and inadequate in far too many places, will not be sufficiently developed to cope with the new traffic and demands of an increasing population. Possible future shortage of water is just one of the issues that have been raised.

Why is the proposed three-year land supply adequate?

The Growth Board now proposes that the requirement for a five-year land supply is replaced with a three-year requirement. This will last until the JSSP is adopted (currently this is expected to be 31 March 2021).

NNGO has several concerns about the deal offered and the woolly proposal for a 'bespoke deal' after which the same old draconian penalties will be imposed by an indifferent central government, undermining any local plans and local democracy.

Our specific comments on the three-year land supply proposals are:

- Where is the evidence that reducing the land supply requirement from five to three years from commencement of the Section 28 process to the delivery of the Joint Statutory Spatial Plan (JSSP) is sufficient? There are no past or current figures given for any of the five districts. We know that there was a five-year supply in the Vale for the last year, but will that continue and what about the other districts? What are the land-supply forecasts for the next few years? What about South Oxfordshire's problems with its plan timetable and the clearly inappropriate developments at Chalgrove and Culham? Is

Oxford City's local plan on time?

- Where is the evidence that even a three-year target could be met by all districts once the JSSP is in place? Do all five districts have a very good chance of meeting the five-year target when it is reimposed?
- Will the penal 'shortfall' and 'buffers' be applied to the five-year supply calculations as soon as the JSSP is in place? They will be calculated based on performance in the next three years 2018-2021 – which may well not meet the targets.
- NNGO is aware that if an area is consistently 'underdelivering' on its target then as the end of the plan period approaches, an impossibly large amount of shortfall can accumulate and this is amplified by the 20% buffer requirements. This can make it effectively impossible for the area to avoid the Presumption in favour of 'sustainable' development (PIFOSD) penalty. This would then mean that almost any development is allowed, however unsuitable or intrusive, and disregarding any normal definition of the word 'sustainable' can be approved by the Minister.

Will a bespoke Housing Delivery Test be sufficient?

In addition to the deal on five-year supply, the Growth Board now proposes a bespoke deal on the HDT for 3 years following submission of the JSSP. The government is planning to set targets for the HDT. PIFOSD will be imposed if the HDT percentage for :

- a) November 2018 indicate that delivery was below 25% of housing required over the previous three years;
- b) November 2019 indicate that delivery was below 45% of housing required over the previous three years;
- c) November 2020 and in subsequent years indicate that delivery was below 75% of housing required over the previous three years.

No deal has been reported for Oxfordshire yet, but this will be the subject of further consultation.

NNGO's concerns are:

- Where is the evidence that there is no need to get a deal to amend the backward looking HDT until after submission of the JSSP? Should the HDT deal start now - at the same time as that for the five-year land supply?
- Where is the evidence that a bespoke deal starting once the JSSP is in place will be sufficient to avoid any further difficulties in the near future with the excessively high locally imposed growth target? When will that target be properly reviewed?
- Should the bespoke deal run on for more than 3 years or indefinitely?
- And finally, have all the interactions between the five-year land supply rules and the HDT been considered for Oxfordshire and are all risks covered by these proposals?

Schedule 4 – Representations by, or on behalf of, development industry and associated interests

The representations below were received by online survey, by post and by email.

Index of Extended Representations

1. Persimmon Homes (Wessex)
2. Nexus Planning on behalf of CEG
3. Barton Willmore LLP on behalf of 'The Consortium' (Bloor Homes, David Wilson Homes (Southern), Gallagher Estates LTD, Gladman Developments, Redrow Homes, University of Reading, Wates Developments LTD)
4. Gladman Developments LTD
5. Savills on behalf of the University of Oxford & Colleges (University of Oxford and Brasenose, Christ Church, Exeter, Magdalen, Merton, Nuffield and St. John's Colleges)
6. David Lock Associates on behalf of 'The Tripartite' (University of Oxford, Merton College and Local Landowner)
7. Terence O'Rourke LTD on behalf of Blenheim Estates and Pye Homes
8. Terence O'Rourke LTD on behalf of Manor Oak Homes
9. Rectory Homes LTD

Schedule 5 – Coding Index

- Proposal will slow (sustainable) delivery of housing rather than improving delivery
- Proposal may backload delivery to later in the plan period (possibly to unreachable targets)
- Proposal does not focus sufficiently on improving delivery mechanisms
- Proposal may impede the development of Local Plans and JSSP
- The current 5-year housing land supply is adequate to meet housing targets
- Proposal may increase need in the market area rather than helping to meet it
- Proposal restricts development on non-allocated sites, which some Districts rely upon to increase numbers of completions
- Government Distrust
- Supporting Data is flawed or absent. The proposal is unjustified.
- Proposal is in direct conflict with NPPF paragraphs 14 and 49, the presumption in favour of sustainable development
- Proposal will allow more time for Local Plans to be developed
- Proposal will help stop speculative developments decided on appeal
- Proposal will result in further delays to the development of Local Plans
- There is sufficient policy to prevent speculative development in place already
- Proposal should not be temporary but permanent
- Additional policies to control speculative development are welcomed
- NA (more affordable housing is needed)
- NA (more support for villages and Neighbourhood Plans is needed to protect from speculation)
- NA (money spent on appeals is better spent elsewhere)
- NA (speculative building is unsustainable or unsympathetic to local communities)
- NA (smaller scale development is needed)
- NA (all speculative planning applications should be suspended until the proposal is decided)
- NA (Councils must manage housing development rather than being led by developers)
- NA (general lack of provision for infrastructure along with speculative development)