

Planning

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Listening Learning Leading

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BY EMAIL

30th October 2020

Dear Rt Hon. Robert Jenrick,

Transparency and Competition - A call for evidence on data on land control

Thank you for the invitation to comment on the above consultation document. South Oxfordshire District Council has reviewed the consultation documents and our response is detailed in this letter in our capacity as the Local Planning Authority (LPA).

The Council strongly supports efforts to improve transparency and competition through the provision of better and publicly accessible data on land ownership and control. The Council considers that the following benefits of the reforms to be of relevance to our function as a local planning authority which we welcome:

- Digitising and streamlining of processes to give access to free data to reduce cost and time in the planning and development processes;
- Greater transparency to identify and understand land affected by contractual controls to encourage more smaller builders and developers to enter the residential construction market;
- Support new firms or self-builders to find plots and enter the market, and for existing firms to expand beyond their locality;
- Allows Councils and local communities to better understand who owns and controls land in their area and the likely path of development in their area;
- A better understanding of land banking and the impact this has on build out rates and therefore the ability of Councils to maintain a supply of deliverable sites in their Districts;
- Increased competition and market efficiency.

Reflecting on the benefits identified above we consider that the proposed measures set out in the consultation to require additional data and for this data to be more readily available to interested parties supports a greater level transparency in the land and property market which is in the public interest

In addition to this consultation the government has set out its proposals for reform of the planning system in England (Planning for the Future), which outlines the governments ambitious plan to streamline and modernise the planning system. These proposals include improved public engagement and fully digitised and web-based plans to improve accessibility to the plan making process, it is therefore important that these reforms are supported by reforms to how other publicly held data is stored and made available. The Council fully supports the move to provide datasets online for public access and consider this will help to make the process more accessible and engaging to the local community.

The Planning for the Future consultation also outlines proposals for Local Plans to identify three 'growth', 'renewal' and 'protected' land designations. The Council's response to that consultation outlines our concerns with this approach. However, we consider it important that if these reforms go ahead that better and more accessible data on land ownership is required to assist this process particularly given the challenging plan-making timescales proposed. We support the requirement for additional information to be collected regarding ownership and controls of land and consider this would provide a better picture of the national and local land and property market. The consultation document at paragraph 45 states '*the additional data will also provide the Government with a sound evidence base from which to identify inefficiencies in the land market*'. We consider it is important to identify inefficiencies in the market and barriers to bringing forward land for development including 'land banking', whilst recognising there may be technical reasons such as lack of infrastructure for why land is not being developed. It is unclear from the document how this data will be used, how market inefficiencies are to be identified, who's responsibility it is to identify inefficiencies and how this will be resourced and what intervention measures are available to the Government or Local Authorities.

We consider clear guidance will need to be provided for Local Authorities on how to use the data and the options available for intervening when inefficiencies in the local land market are identified. Consideration is also needed as to the additional financial and resource pressures placed on local authorities to ensure they are sufficiently resourced to make effective use of the additional data.

Please do not hesitate to contact us if you wish to discuss any matters relevant to our Councils that arise as you progress with the reforms.

Yours sincerely,

Ryan Hunt
Planning Officer
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South Oxfordshire District Council