

Community Infrastructure Levy Draft Charging Schedule Consultation



List of responses (Surname / Organisation name beginning S - Z)

This document sets out responses submitted to the consultation on the Community Infrastructure Levy Draft Charging Schedule, which was undertaken between 10 July and 21 August 2020.

You can scroll through the responses or click on a name below to view a particular response.

Personal details including postal address, signatures and email addresses of individual respondents have been removed.

Salmon, Catherine	Vassen, Sean
Saul, Geoff	Walton, Clare
Seaton, Patricia	Walton, Emma
Sharp, Russell	Ward, Kate
Shaw-Williams, Ruth and Tony	Waters, Hannah
Siveter, Derek	Waters, Harry
Skliros, John	Wellingham, Jeremy
Smith, Dr Adrian	Wellingham, Karen
Smith, June	Whitfield, Nancy
Snoxell, John	Wildman, Andrew
South Oxfordshire and Vale of White Horse District Councils	Williams, Rebecca
Spitfire Homes	Williams, Stephen
St John, Harry	Williamson, Claire
Standlake Parish Council	Williamson, Graeme
Stedman, Elizabeth	Willis, Olivia
Stewart Brothers Property Ltd	Witney Town Council
Summers, Dr Sarah	Witney Parish Transport
Tennent, Bridget	Woodstock Town Council
Tysoe, Michael	Wright, Marion and Geoff
Universities Superannuation Scheme Limited	

From: cathy sal [REDACTED]
Sent: 19 August 2020 09:31
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response / East Chipping Norton Development

Dear Mr Chris Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure.

It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Of particular concern is the strain on parking availability, added pollution, added burden on our already stretched health services, inadequate recreational facilities and lack of provision of adequate water pressure - which is a particular problem in the area that I live, being so close to the schools and leisure centre. Added infrastructure would escalate this problem.

I am also concerned that an environmental study has not been undertaken - a point that I raised at one of the last council meetings. As a past candidate to stand for election, please take note that the residents of Chipping Norton feel very strongly about their town and are very aware that changes could have a negative impact on its residents if certain risk factors are not mitigated and financial measures not implemented early enough.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed. **It would be shocking if the wishes of the towns residents are ignored.**

Yours sincerely,

Catherine Elizabeth Salmon

[REDACTED]

Mobile: [REDACTED]

Geoff Saul
District Councillor for Chipping Norton

Tel: [REDACTED]
[REDACTED]
[REDACTED]

Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

By email to: planning.policy@westoxon.gov.uk

20th August 2020

Our Ref:

Dear Sirs,

Consultation on CIL Charging Schedule

As a District Councillor for Chipping Norton, I wish to object to the proposed *zero-rating* of the East Chipping Norton Strategic Development Area (SDA) in the CIL Charging Schedule. This is a development that will add 1,200 new homes to Chipping Norton - an increase of around a third in the number of homes in the town.

The *zero-rating* proposal will adversely impact the amount of infrastructure funding available for the benefit of the town and the unmitigated impact of an extra 1,200 homes on the Town will have unwelcome effects on the town's wellbeing.

In this letter I will briefly discuss in turn the town's infrastructure needs, the role that CIL could play in meeting those needs and the disadvantages of solely relying upon Section 106 contributions for infrastructure funding.

In conclusion, I recommend that the initial proposed CIL charging rate for the Strategic Development Areas of £100 per m² should be reinstated on the basis of either reviewing the viability criteria upon which the *zero-rating* proposal is based *or* in any event adopting a mix of infrastructure funding between CIL and Section 106 contributions.

Chipping Norton's infrastructure needs

At various briefings and workshops I was assured that the *East Chipping Norton SDA* would provide a once in a generation opportunity to provide major infrastructure benefits for the town and local community.

The Local Plan 2031 sets out a number of identified infrastructure needs for Chipping Norton.

Paragraph 9.4.70 on page 209 lists the following needs in particular: “*additional public car parking, primary education, leisure facilities, library provision, play facilities, public transport improvements and pedestrian and cycle links.*”

Paragraph 9.4.71 goes on to add: “*Some of these will be provided directly as part of new developments (e.g. a new primary school as part of the proposed Strategic Development Area to the east of the town) whilst others will be provided indirectly through developer contributions and other potential sources of funding.*”

Paragraph 9.4.72 continues: “*The IDP.....will form the basis upon which future decisions regarding the provision of new or improved infrastructure will be made along with the Council's CIL regulation 123 list once introduced. CIL revenues passed to local communities including the Town Council will be able to be spent on locally identified infrastructure priorities including those identified in the Chipping Norton Neighbourhood Plan*”, and

Paragraph 9.4.73 concludes “*In accordance with Policy OS5, we will seek to ensure that all new development within the Chipping Norton sub-area is supported by appropriate and timely provision of essential supporting infrastructure.*”

As can be seen from the above excerpts from the Local Plan, it was always anticipated that this necessary infrastructure funding would be funded by developer contributions and in particular from CIL revenues.

The role that CIL could play in meeting those needs

The original draft CIL Charging Schedule set a charge of £100 per m² for the Strategic Development Areas. It was therefore assumed that CIL receipts from the *East Chipping Norton SDA* would be available to help improve the Town and to offset the impact of these 1,200 new homes on the town. CIL, we were told, could be used to fund a wide range of infrastructure including transport, schools, green space and community and cultural facilities.

Moreover, because an adopted Neighbourhood Plan is in place WODC would have to pass 25% of CIL receipts in Chipping Norton to the Town Council. A great many spending decisions could therefore be taken at the level of democratic decision making closest to the local community. The Town Council could, for example, itself apply funds towards issues such as traffic calming, parking improvements and limiting HGV traffic through town, not to mention children's play equipment, new public seating areas and open space maintenance – all projects ideal for CIL Receipts.

If, however, CIL for the *East Chipping Norton SDA* is *zero rated* the town would have to rely entirely upon developer's Section 106 contributions for infrastructure funding and this can be problematic as I will set out in the next section of this letter.

The drawbacks of relying on Section 106 contributions

The viability assessments supporting the proposed CIL charging schedule estimate that £15.4 million of section 106 contributions would need to be provided by developers in respect of the *East Chipping Norton SDA* over and above the provision already factored in for a new primary school and a new link road.

Essentially, however, planning legislation dictates that required Section 106 contributions must meet the following three tests. They must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

So, in the case of the *East Chipping Norton SDA*, this would include things like the proposed new primary school together with other on-site infrastructure required for the development to function. However, it is more difficult on the basis of these tests to get developers to fund projects that *benefit the wider town and district*.

To get such “wider” funding, we would be relying upon the negotiating skills and the bargaining position of the District and County officers who would need *before anything else* to argue how such “wider” community benefits could be *directly related* to the development. Accordingly, such funding could be quite restricted in scope and hedged about as to how it could be used.

CIL payments, by contrast, would automatically go into a general pot that could be spent on any item of ‘infrastructure’. This is one of the big advantages of CIL.

Moreover, the negotiation of Section 106 contributions is rarely the open and transparent process that it perhaps should be.

To recap, I am concerned that on these criteria Section 106 contributions will be restricted to “*on site*” *infrastructure requirements* while as a result of the proposed zero-rating charge we will lose CIL revenues that could have been more expansive in scope so as to benefit *the wider Town (and District)*.

Zero-rating CIL therefore fails to meet the requirements of Chipping Norton. If the necessary infrastructure funding does not come from CIL, where it will come from? I have not yet had a convincing answer to this question.

My recommendations

The initial proposed CIL charging rate for the Strategic Development Areas was set at £100 per m² and I would propose that such a CIL charging rate should be reinstated.

I therefore make the following recommendations that could still enable such a result:

1. **Review the viability criteria upon which the zero-rating proposal is based; and/or**
2. **Adopt a mix of infrastructure funding between CIL and Section 106 contributions**

Neither of these proposals need be exclusive of the other. My thoughts are as follows:

1. Review the viability criteria upon which the zero-rating proposal is based

This is a prime housing development location with the principle of development already established and I do not accept that a CIL charge £100 per m² as originally proposed would make the development unviable.

If the original proposed CIL charging rate for the Strategic Development Areas was set at £100 per m² I calculate that total CIL receipts on the *East Chipping Norton SDA* would be just in excess of **£5 million** (of which just under £1.3 million would be passed to the Town Council). My calculation is set out in the Schedule at the end of this letter.

For a CIL charge to be viable at the original proposed rate of £100 per m² developers would need to be able to fund **£5 million** on a scheme with a gross development value projected at close to **£250 million**. This is just 2% of the gross development value.

I also note that the February 2017 Report by the Department for Communities and Local Government reviewed the operation of CIL and concluded that on average a typical residential CIL charge approximated to 2% to 3% of the house price and that the impact on development viability of charging CIL was often negligible, certainly in a rising housing market.

The submissions being lodged by Hailey Parish Council and Chipping Norton Town Council raise questions about the viability appraisal criteria employed by WODC's consultants and I would request that there is a careful review of these viability criteria.

It follows that the presumption that charging a CIL rate would in itself make the *East Chipping Norton SDA* unviable has yet to be proved.

2. Adopt a mix of infrastructure funding between CIL and Section 106 contributions

The viability assessments referred to above anticipate that the developers will have to stump up £15.4 million to the Local Authority for infrastructure spending over and above the provision already factored in for a new primary school and a new link road.

It is just a policy choice, however, that developers should make these payments entirely by virtue of Section 106 contributions rather than through CIL. There is no requirement that this should be the case and WODC could make a different policy choice.

There are alternative approaches and Local Authorities can, for example, take responsibility for all infrastructure bar the *on-site* provision and instead charge a high CIL rate instead. This is an approach that Wokingham Borough Council have, for example, taken on a number of their Strategic Development Sites.

Whatever the ultimate agreed figure for developers' infrastructure funding contributions on the *East Chipping Norton SDA*, WODC could nevertheless agree a mix of Section 106 and CIL contributions in order to meet that infrastructure funding.

If WODC agreed with me that CIL was a better delivery vehicle for delivering community benefits then the infrastructure contributions could be divided between CIL and Section 106 contributions.

This should provide the most flexible funding result with the following advantages:

- a "general pot" of CIL revenues "without strings" would be created that could be spent on any item of 'infrastructure'.
- The local community would be better able to determine priorities. A CIL charge would best enable responsive local decision making due to the fact that 25% of the CIL pot would be routed through the Town Council.

Summary

I therefore propose that WODC rethink their proposals and set a CIL charging rate on the *East Chipping Norton SDA* at or close to the original proposed CIL charging rate for the Strategic Development Areas of £100 per m².

Yours faithfully,

Geoff Saul
District Councillor for Chipping Norton

Schedule
Possible CIL receipts on the *East Chipping Norton SDA*

For these purposes we have applied the originally proposed rate of **£100 per m²** to the remaining 1,000 dwellings that remain to be built on the East Chipping Norton Strategic Development Area and made the following assumptions:

1. that 400 of the dwellings will not be chargeable to CIL because they will be *affordable housing*;
2. that a further 50 homes will be exempt from CIL because they are self-build dwellings;
3. that the remaining 550 homes will be built roughly in the proportions set out in the Local Plan for mix of properties, namely 5% 1 bed, 28% 2 bed, 43% 3 bed and 24% 4 bed.

Dwelling size	No. of dwellings	CIL payable per property	Total CIL payable per class of dwelling	Share of CIL due to Town Council per property (25%)	Share of Total CIL due to Town Council per class of dwelling (25%)
Apartment: 50sqm	26	£5,000	£130,000	£1,250.00	£32,500
2 Bed House: 75 sqm	153	£7,500	£1,147,500	£1,875.00	£286,875
3 Bed House:90 sqm	238	£9,000	£2,142,000	£2,250.00	£535,500
4 Bed House: 130 sqm	131	£13,000	£1,703,000	£3,250.00	£425,750
Total			£5,122,500		£1,280,625

Accordingly, if charged at the originally proposed rate of **£100 per m²** developers would have to pay on this calculation just over **£5 million** in CIL charges, of which just under **£1.3 million** would come to Chipping Norton Town Council.

[REDACTED]

From: Tricia Seaton [REDACTED]
Sent: 20 August 2020 07:40
To: Planning Policy (WODC); Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempted from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will significantly increase the size and population of our town and subsequently will put additional pressure on our already stretched infrastructure.

It is vital that improvements in both infrastructure and community facilities are made in order to accommodate the growth in the town; in particular the rise in both young families and retired people will require additional healthcare and leisure facilities. People choose to move to this beautiful part of the country to enjoy fresh air and green open spaces, not urban development and traffic pollution, which could easily be the case if this development is not handled in a sensitive manner.

Companies who are profiting substantially from house building must be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come, as was planned when this major development was originally proposed.

Yours sincerely

Dr Patricia Seaton

[REDACTED]

[REDACTED]

From: russell sharp [REDACTED]
Sent: 19 August 2020 20:32
To: Planning Policy (WODC)
Subject: CIL consultation

I object most strongly to the proposal put forward by WODC. Flawed supporting evidence, loss of community infrastructure & exclusion of local population involvement. Ps where are the local jobs to support your house building plans ?

Sent from my iPhone

[REDACTED]

From: Ruth Shaw-Williams [REDACTED]
Sent: 21 August 2020 16:48
To: Planning Policy (WODC)
Cc: robert.courts.mp@parliament.uk; David Harvey; Vanessa Scott
Subject: East Chipping Norton Development CIL

Mr Chris Hargraves,
Planning Policy Team
West Oxfordshire District Council Elmfield
New Yatt Road
Witney, OX28 1PB

Dear Mr Hargraves

As a residents of Chipping Norton we were very concerned to hear that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

Just to give a little background, having lived here for thirty years now, we have followed with interest and some apprehension the timeline for proposed development on this site. We initially saw a proposal for fifty houses on this site declined in 2007, in part because:

"The provision of additional unplanned housing of the scale proposed would upset the balance between workers and jobs and consequently would be likely to cause an *unsustainable increase in commuting* from the town."

Despite a detailed and reflective rationale for declining the development being given in 2007, seven years later, the proposed number of houses had grown to five hundred:

"It is therefore suggested that the site is allocated for the provision of five hundred new homes as part of a comprehensive mixed-use development to include additional employment land, a new primary school, local centre and other supporting infrastructure including formal and informal greenspace (sic)."

Section 6.175 of the "Focused Housing Consultation July 2014"

Fast forward to the Local Plan adopted in September 2018, where we are now looking at an expansion to one thousand two hundred new homes for East Chipping Norton.

We recently received a document, prepared by Councillor Geoff Saul and Chipping Norton Town Council, explaining the consultation on the CIL Consultation on Draft Charging Schedule Impact on Chipping Norton. Since looking through this, we have now learned:

"The chief implication for Chipping Norton is that WODC propose to charge CIL on the East Chipping Norton Strategic Development Area (and the other strategic sites in the District) at a zero rate."

We are aware that:

“the East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.”

On a more personal level, our reason for writing to you is that we are increasingly concerned about the impact this proposed new development will have on the environment, the levels of pollution and loss of biodiversity. Some of these worries were at least assuaged when we were invited to be involved in the Maccreanor Lavington Architects’ workshop in the Town Hall. This has culminated in the East Chipping Norton Vision Statement.

We were further encouraged to read in Geoff Saul’s report that:

“WODC is also seeking to ensure that the strategic sites achieve suitably ambitious levels of climate change mitigation and adaptation which will have additional cost implications.”

However, in light of this, it then appears to be massively counter-intuitive and concerning to further read:

“Accordingly, WODC have chosen to exempt or “zero-rate” their strategic sites from CIL on the grounds of viability.”

If you are setting the CIL charge to zero, it is not clear how the infrastructure costs are to be met? More importantly, could it be that zero rating levies lead to unconstrained large developments further impacting on the natural environment?

Following WODC declaring a Climate Emergency in June 2019, minutes from a Council meeting held in January of this year “*Climate Action for West Oxfordshire Agenda item 9*” reassuringly listed these three Corporate priorities:

1. To protect the environment whilst supporting the local economy
2. Working with communities to meet the current and future needs and aspirations of residents
3. To provide efficient and value for money services, whilst delivering front line services

If our reading is correct, viability in this case seems to relate to the profits made by the developer? Of course this is an undisputed fact, developers are in the business of making money, but as WODC have already stated, going forward we all have a collective responsibility for the environment. As recent local, national and global events have shown, the viability of the planet takes priority over all else.

*“If we retreat from the detail for a moment, it seems extraordinary that the development as it stands (even without any CIL contribution) is said to be unviable to the tune of £11 million. Note, however, that this is not the same as a projected £11 million loss. **What it would mean is that the developer’s profit would come down from £39 million to £28 million** - and the Government criteria state that this would not be a viable rate of return for a developer!*

It is also worth noting that the February 2017 Report by the Department for Communities and Local Government reviewed the operation of CIL and concluded that on average a typical

residential CIL charge approximated to 2% to 3% of the house price and that the impact on development viability of charging CIL was often negligible, certainly in a rising housing market.”

The dropping of the CIL seems therefore to be contradictory and depart somewhat from two of the previously stated WODC Corporate priorities. Rather than intending to “protect the environment whilst supporting the local economy” and work “with communities to meet the current and future needs and aspirations of residents”, a zero charge might well attract a less environmentally aware, large developer to this site where once there was a proposal for a mere 50 dwellings.

Thanking you for your kind attention.

Yours sincerely,

Ruth and Tony Shaw-Williams

[REDACTED]
[REDACTED]
[REDACTED]

cc Robert Courts MP
robert.courts.mp@parliament.uk

Cllr David Harvey, Cabinet Member for Climate Change Email: david.harvey@westoxon.gov.uk

Ness Scott, Climate Change Manager
Tel: [REDACTED] Email:
[REDACTED]

From: Derek Siveter [REDACTED]
Sent: 06 August 2020 14:36
To: Planning Policy (WODC)
Subject: Community Infrastructure Levy (CIL) decision for North and East Witney developments

Dear Sir/Madam,

I wish to object to the WODC decision to abolish the Community Infrastructure Levy (CIL) for the proposed North and East Witney developments on the basis of flawed estimates in house price changes.

The removal of some £77 million from the original value of these two developments is unjustified, according to estimates presented and distributed by Hailey Parish Council in July, which data shows that house prices increased (not decreased) over the 2016-2019 period. In consequence, it seems that CIL can be afforded with respect to these two new large developments, this infrastructure levy being essential for all the vital community provisions and facilities that will prevent them otherwise ending up as soulless sink estates and future blots on the Witney landscape.

Additionally, there appears to be a regrettable lack of community involvement with respect to relevant WODC infrastructure spending decisions.

Yours,

Derek J. Siveter

[REDACTED]

[REDACTED]

From: Em Quad Mobile [REDACTED]
Sent: 19 August 2020 11:34
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: Zero-Rating of Community Infrastructure Levy

Dear Mr Hargreaves,

I am writing to express my concern as a local resident that the developers responsible for the proposed East Chipping Norton development could avoid paying the Community Infrastructure Levy (CIL) if the recommendation in your consultation paper to zero-rate the levy is implemented.

Whilst a balance must be struck between the benefits to and impact on the local community of new housing, the waiving of the CIL payment is unjustifiable. It is morally right that those who stand to profit from housing development also contribute to the cost of improving local infrastructure that will inevitably bear the impact of a substantial population increase.

The Government's policy on what constitutes a 'viable' profit need to be re-examined in the light of the damage currently being sustained by the UK economy. I cannot think of any other industry that is effectively being given a guaranteed ROI of 15-20%. It is not the role of Government to create unfair advantages, nor should it be the role of District Councils to be complicit in profit maximisation for private industry at the expense of the communities which they were set up to serve.

If the CIL is charged at the appropriate rate, the developer will not go out of business; they will just make a smaller profit. There is no element of peril here, so no concessions should be granted. The interests of property developers should *never* be placed above those of the communities in which they make their profits.

Yours ever,
John Skliros

[REDACTED]
T | M

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched services infrastructure.

It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town. Unless this is achieved the town will be a much less attractive to live in with existing services stretched beyond breaking point

For example:

1. **The health centre is already running at near full capacity** and it is unrealistic to allow the town's population to grow without a corresponding increase in local healthcare provision.

Research has shown that seeing the same GP routinely can lead to better outcomes as the GP builds a picture of how you have changed over time – something that is impossible if you see a different GP on each visit.

Even before the Covid crisis it could be difficult to a GP for non-urgent conditions and practically impossible to see your own GP routinely.

This situation will become even worse in future unless additional healthcare capacity is funded and provided.

2. **The centre of the town already has unacceptable air pollution levels** (by the site of the former Harpers store).

An increase in traffic volumes will make this problem worse. The provision of the ring road is supposed to mitigate this increase in pollution but **the provision of the ring road or alternate routes avoiding the town centre also need to be funded.**

3. Provision needs to be made for open and recreation space local to the new development.

Without this residents of the new housing will depend entirely on existing facilities near the town centre and will either have to drive there to gain access or do without. Parking in the town centre is already limited and this will only provide increased pressure on the limited parking spaces.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come.

This is what those living in Chipping Norton were promised when this significant development was originally proposed.

It is unreasonable and unrealistic to expect that either:

- **'Someone else will pay' OR that**
- **Provision of additional services and infrastructure is unnecessary (and that the town will just have to put up with inadequate services for years to come).**

Putting short term profit margins before the long-term attractiveness of the town as a place to live is not in the best interest of either current or future residents.

Yours sincerely

Dr Adrian Smith.



[REDACTED]

From: June Smith [REDACTED]
Sent: 06 August 2020 10:35
To: Planning Policy (WODC)
Subject: CIL

Dear Planning Authority,

I have been given to understand that there is a proposal to zero rate the CIL with regard to development in North and East Witney.

If this is so, it seems very perplexing at a time when good amenities and infrastructure are known to be essential for health and well being and for engendering a good community.

Why is the council granting a windfall to the landowners at the expense of good community assets?

As I said, I am perplexed!

June Smith

[Sent from Yahoo Mail for iPad](#)

[REDACTED]

From: John Snoxell [REDACTED]
Sent: 15 August 2020 11:09
To: Planning Policy (WODC)
Subject: CIL Consultation

Dear Sirs,

I wish to register my strong objection to the WODC proposal to abolish the Community Infrastructure Levy for the North and East Witney developments.

My objection is based on the same grounds as that of the Hailey Parish Council.

John Snoxell
[REDACTED]

Planning

HEAD OF SERVICE: ADRIAN DUFFIELD



By email:

[Redacted email address]

Contact officer:

[Redacted contact officer name]

Textphone users add 18001 before you dial

Your reference:
Our reference: West Oxfordshire DC CIL and Affordable Housing SPD consultation

21 August 2020

Dear Chris Hargraves,

Thank you for the invitation to comment on West Oxfordshire District Council's Draft CIL charging schedule and Draft Affordable Housing SPD. At this time South Oxfordshire and Vale of White Horse District Councils have no comment to make on these documents.

We recognise the importance of CIL funding in supporting the delivery of local infrastructure as set out in the Infrastructure Delivery Plan and would like to highlight the role that cooperative working across Oxfordshire has also played in delivering infrastructure improvements in the County. Going forward we hope to continue this successful cooperative working.

Please keep us informed of your progress to Examination, and do not hesitate to contact us if infrastructure or charging schedule matters relevant to South Oxfordshire or Vale of White Horse District Council's arise as you progress to the next stage.

Yours Sincerely,

[Redacted signature]

Adrian Duffield
Head of Planning
South Oxfordshire and Vale of White Horse District Councils

Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

SUBMITTED VIA EMAIL ONLY

32089/A3/SJ/KV

20th August 2020

Dear Sir/Madam,

REPRESENTATIONS TO THE WEST OXFORDSHIRE DRAFT COMMUNITY INFRASTRUCTURE LEVY (CIL) CHARGING SCHEDULE

We write on behalf of our Client, Spitfire Homes and welcome the opportunity to respond to the Draft Community Infrastructure Levy (CIL) Charging Schedule (March 2020) for West Oxfordshire District Council (WODC).

The National Planning Policy Framework (NPPF, 2019) Paragraph 34 requires Local Plans to set out the contributions expected from development, including affordable housing along with other infrastructure. Such policies should not undermine the deliverability of the plan. Paragraphs 55-57 set out the approach to be taken to planning conditions and obligations, including the key tests to be met for seeking planning obligations and the requirement for all viability assessments (including those undertaken at the plan-making stage) to reflect the recommended approach in the national planning guidance. The National Planning Practice Guidance (NPPG, as updated) sets out detailed guidance for the preparation of a CIL Charging Schedule, including for the preparation of the supporting evidence base (namely viability assessments). The CIL Regulations (2010, as amended) provide the key statutory legislative framework for the introduction of a CIL Charging Schedule. Critically, when deciding CIL rates an authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments (NPPG Paragraph 010 Reference ID: 25-010-20190901 and CIL Regulation 14(1)).

Our representations are submitted with these national legislative, planning policy and guidance considerations in mind. Comments on the Draft CIL Charging Schedule are made firstly, followed by observations on the supporting evidence base.

Draft CIL Charging Schedule (March 2020)

The Draft CIL Charging Schedule proposes the following differential residential charging rates across the District based upon both geographical area and the scale, and type, of development.

Zone	1 to 10 dwellings	11+ dwellings	Extra-care housing	Strategic sites
Low	£200	£100	£100	£0
Medium	£250	£125	£100	£0
High	£300	£150	£100	£0

It is noted that the Draft CIL Charging Schedule (March 2020) takes forward the recommendations of the West Oxfordshire District Council Community Infrastructure Levy Viability Assessment (January 2020) hereafter referenced as **'the Viability Assessment'**. The proposed differential rates by zone and scale of development align with the West Oxfordshire Local Plan (2018) Policy H3 Affordable Housing requirements, which also vary according to these different **'zones'** across the District.

The principle of differential rates based upon the scale of development, with schemes of 11+ dwellings subject to a lower rate of CIL, is supported as it reflects the policy requirements for affordable housing contributions (and other potential planning obligations) for larger schemes, with subsequent implications for overall development viability. WODC could consider if the evidence justifies the need for any further differentiation between the current categories of 11+ dwelling sites and Strategic Sites, given the large variation in scale between these two e.g. a development scheme of 12 dwellings may be subject to lesser planning obligation requirements than a scheme of 200 dwellings, and the Viability Assessment demonstrates how the **'maximum residential CIL rates' reduce** relative to the increasing size of the development (Table at Paragraph 1.12). This is partly dependent upon WODCs approach to the combination of CIL and planning obligations going forward, which is discussed further under **'Supporting evidence base' comments**.

As referred to in further detail below under our comments on the supporting evidence base, WODC should be confident that the supporting evidence is sufficiently up to date and of a suitably fine-grained analysis to justify the differential rates within the Draft Charging Schedule.

Crucially, WODC should be confident that the levels of CIL proposed are not being set at the margins of viability, as per the NPPG (Paragraph 020 Reference ID: 25-020-20190901) so that the levy rate is able to support development when economic circumstances adjust, and that the levy rates will not consequently undermine the deliverability of the Local Plan (as per NPPF Paragraph 34). This is particularly relevant in the current uncertain economic climate arising from the COVID-19 pandemic. The Viability Assessment (paragraph 6.14) states that the proposed rates are guided by the greenfield viability maximum potential rates (as the District envisage a primarily greenfield delivery strategy) with a minimum viability buffer of 30%. The appropriateness and accuracy of this minimum buffer should be considered in light of comments on the evidence base below.

Supporting evidence base

The supporting evidence base for the Draft Charging Schedule primarily constitutes the Viability Assessment (with supporting CIL Viability Appraisal Spreadsheets, both January 2020); an Infrastructure Funding Gap Analysis (June 2020); and an Infrastructure Delivery Plan (November 2016) in accordance with the CIL Regulations 14(1) and 16 and the NPPG.

Viability Assessment (January 2020)

The Viability Assessment references most the recent NPPF and NPPG (2019) in relation to the process for setting CIL charging rates and the more detailed recommended approach to undertaking the viability assessments. The Viability Assessment was concluded in January 2020, with much of the supporting analysis completed in mid-late 2019 e.g. the HEB valuation study of all categories of residential and commercial property values (Appendix 1 to the Viability Assessment) was undertaken in June-October 2019. **Whilst this appears to be up to date, it was completed during a 'pre-COVID 19' era. The Council should consider if the emerging economic implications of the COVID-19 pandemic need to be factored into the development viability analysis. For instance, paragraph 4.31 of the Viability Assessment recognises that a 'competitive profit' will vary in relation to prevailing economic conditions and at paragraph 4.34 it states "the sale value of the development category will be determined by the market at any particular time and will be influenced by a variety of locational, supply and demand factors as well as the availability of finance. The study uses up to date comparable evidence to give an accurate representation of market circumstances."** Clearly, these circumstances have altered since late 2019.

At paragraph 2.2 the Viability Assessment outlines that the assessment process has been undertaken **in line with the Government's viability practice guidance, using generic development typologies "to consider the cost and value impacts of the adopted local plan policies and determine whether any additional viability margin exists to accommodate a Community Infrastructure Levy. The development viability assessments take account of policies in the plan, affordable housing requirements, National Housing Standards and current construction requirements to determine whether charging CIL is viable and will not hinder the delivery of development in the plan period."**

The NPPG (Paragraph 020 Reference ID: 25-020-20190901) outlines that the charging authority should sample an appropriate range of types of sites across its area, and that when charging authorities decide to set differential rates they may need to undertake more fine-grained sampling, on a higher proportion of total sites, to help them estimate the boundaries for their differential rates and justify differentiation between scales of uses. WODC should ensure that the differential rates (by both area and scale of use) are sufficiently justified by the grain of analysis undertaken, in line with the NPPG.

The Viability Assessment analysis and recommendations align with the West Oxfordshire Local Plan (2018) Policy H3 Affordable Housing requirements, which also vary according to the different 'zones' across the District. Whilst affordable housing is a key consideration in assessing development viability, it should be ensured that the assessment process takes into account all of the developer contributions set out in the Local Plan.

Further detail is provided on each of the assumptions employed in Section 4 of the Viability Assessment. The assumptions on construction costs and policy costs appear to reflect the Local Plan policy requirements for design standards such as accessibility and current building regulation requirements. It is however noted that at Paragraph 4.20 the Viability Assessment assumes current **building regulation requirements for 'Sustainable Constructions Standards'**. In the Draft Affordable Housing SPD (June 2020, paragraph 6.4) currently out for consultation, WODC notes that it has **recently declared a 'climate emergency'** (June 2019) and that the Council will seek the highest possible sustainable construction standards, particularly for affordable housing. The assumptions underpinning the viability assessment in terms of construction costs should therefore ensure they fully reflect any policy expectations for sustainable construction standards by WODC.

Whilst it is not expressly referenced in the Viability Assessment, it is presumed that the Local Plan policy requirements for any site- specific infrastructure (such as open space or education) are accounted for within the assumptions employed for Section 106 planning obligations. These are **based upon previous years' data for planning obligations from development schemes**. It is noted that there is no specific reference to the Oxfordshire County Council approach to developer contributions

for matters such as education and highways. It should be ensured that within two-tier authority areas collaborative working on the setting of CIL rates and CIL expenditure is undertaken (as per the NPPG, Paragraph 014 Reference ID: 25-014-20190901). The assumptions should reflect the most up to date policy position of the County Council in respect of their planning obligation requirements.

Infrastructure Funding Gap Analysis (June 2020) and Infrastructure Delivery Plan (November 2016)

The Infrastructure Funding Gap Analysis provides an assessment of the infrastructure requirements to support the Local Plan and the potential infrastructure funding gap arising which helps to justify the introduction of a CIL Charging Schedule (in accordance with the CIL Regulations 14(1), the NPPG Paragraph 016 Reference ID: 25-016-20190901 and Paragraph 017 Reference ID: 25-017-20190901). The analysis concludes that CIL is likely to generate around £24.5million in funding for infrastructure. Taking into account other known sources of infrastructure funding, including Section 106 planning obligations, this leaves an infrastructure funding gap of at least £167.7-£173.5million (WODC considers this to be a conservative estimate given that the full costs of infrastructure projects remain unknown at this stage). The introduction of CIL is therefore justified based upon an identified infrastructure funding gap.

The Infrastructure Funding Gap Analysis sets out how CIL monies and Section 106 planning obligations will 'complement' one another to fund infrastructure requirements. It is recognised that the 2019 updated national legislative and policy position allows for items of infrastructure to be funded via both CIL and Section 106 planning obligations and the pooling limit for Section 106 planning obligations no longer applies. WODC should however be transparent which elements of the Council's infrastructure requirements will be funded via CIL and Section 106 planning obligations to ensure that there is no 'double dipping' in relation to the removal of the Section 106 agreement pooling restriction and dual funding of infrastructure items via Section 106 and CIL, which could adversely impact upon the viability of individual development sites. The NPPF (paragraph 56) sets out the three tests which must be met before seeking a planning obligation, one of which is that the obligation must be 'necessary' to make the development acceptable in planning terms. The Council's approach should reflect the fact that funding of an infrastructure item will not be 'necessary' via a planning obligation if it is being funded via CIL.

In accordance with the NPPG (Paragraph 018 Reference ID: 25-018-20190901) WODC will be required to set out the projects or types of infrastructure that are to be funded in whole or in part by the levy at the CIL Examination. From December 2020, this should be set out in an Infrastructure Funding Statement. Many CIL charging authorities have produced or updated Supplementary Planning Documents related to developer contributions to provide this transparency and clarity. The Annual Monitoring Report (2018/19) for the Local Plan states that a Developer Contributions Supplementary Planning Document is anticipated to be adopted by Autumn 2020 to provide further guidance on WODCs approach towards the use and inter-relationship between planning obligations, planning conditions and CIL. However, this has not been published to date. The Annual Monitoring Report also references the requirement for all local authorities to produce Infrastructure Funding Statements by the 31st December, which will monitor developer contributions received and should set out how a Council will fund items of infrastructure via CIL and/or Section 106 planning obligations.

WODC should provide further information as soon as possible on the future relationship between CIL and Section 106 planning obligations for development schemes, including consultation with stakeholders. The approach of Oxfordshire County Council in respect of its planning obligation requirements for education and highways should be fully accounted for as part of this process. The approach should ensure 'double dipping' from individual development sites is avoided and that it does not adversely impact upon development viability and the overall delivery of housing to meet Local Plan needs. This would also accord with the NPPG Paragraph 003 ID: 23b-003-20190901) on 'Planning Obligations' which states **"where the CIL is in place for an area, charging authorities should work proactively with developers to ensure they are clear about the authorities"**

*infrastructure needs. Authorities can choose to pool funding from different routes to fund the same infrastructure provided that authorities set out in infrastructure funding statements which infrastructure they expect to fund through the levy. Plan makers should consider the combined total impact of such requests so they do not undermine the **deliverability of the plan.**"*

It is noted that the Infrastructure Funding Gap Analysis is based upon the Infrastructure Delivery Plan (IDP) dated 2016, which was used to support the Local Plan, with the Council having regard to any known changes since 2016. WODC should consider if this IDP is sufficiently up to date having been produced 4 years ago and it is recommended that an updated IDP is produced to reflect any changes which have been accounted for in the Infrastructure Funding Gap Analysis to provide greater transparency.

Other supporting evidence

As outlined above, WODC should provide further information on the projects or types of infrastructure that are to be funded in whole or in part by CIL in order to ensure transparency and provide clarity to stakeholders on the expectations for developer contributions from individual development sites. Crucially, this should be clear on when developments may be expected to contribute via both CIL and Section 106 planning obligations and **seek to avoid 'double dipping' that may impact upon the development viability for individual sites.**

The NPPG (Paragraph 019 Reference ID: 25-019-20190901) outlines that as background evidence for the CIL Examination process the charging authority should also provide information about the amount of funding collected in recent years through Section 106 agreements. This should include information on the extent to which affordable housing and other targets have been met. This information does not appear to have been provided to date. The most recent Annual Monitoring Report (2018/19) for the Local Plan does not appear to contain any commentary on planning obligations, although it does reference the requirement for all local authorities to publish an annual Infrastructure Funding Statement by 31st December 2020 to report on planning obligations and CIL. This evidence would provide a useful insight on the degree to which Local Plan policies have been viable in practice since their adoption.

Conclusion

We trust these representations are helpful to inform the next stage of the Draft Charging Schedule. Should you require any clarification of the points please contact me. Please note, in accordance with CIL Regulation 16 we wish to be notified of the following:

- That the Draft Charging Schedule has been submitted for examination;
- The publication of the recommendations of the examiner and the reasons for those recommendations;
- The approval of the charging schedule by the West Oxfordshire District Council.

We also wish to exercise our right to request to be heard by the Examiner, in accordance with CIL Regulations 16 and 21.

Yours sincerely,



KATHRYN VENTHAM
Partner

Representation on the WODC Draft CIL charging schedule - consultation (Due by Friday 21st August 2020)

Introduction

My name is Harry St John.

1. My Qualifications are

BSc in Estate Management from Reading University.

FRICS FAAV

I was a Registered Valuer with the RICS.

I retired from practice in December 2017.

I am now a District Councillor for North Leigh, where I have lived for over twenty years.

2. Experience

I am a Chartered Surveyor and worked for 47 years largely in the rural property sector; since 1983, I practised in Oxfordshire and adjoining counties of central England. During that time, I was an employe and Partner in two National firms of Chartered Surveyors and finally an associate Director of a third.

From about the mid 1980s, I was involved daily with the valuing, buying and selling of land and rural property – from cottages, small plots, to mansion houses, farms and larger rural estates.

In the last twenty years of my career I was increasingly involved in residential development sites, acting for landowners and I dealt with many developers, planning, other specialist consultants and LPA planning departments.

As a result, I saw how the planning system worked and was closely involved in the market in residential development land, options and promotion agreements.

3. My Comments on the draft CIL Charging Schedule and supporting documentation

3.1 Lack of market evidence on recent development land sales values achieved in West Oxfordshire.

I am aware of a good number (see summary of sites sold and now developed or being developed in **Annex 1**) which could give a

clear picture of what has been achieved in the local market in the last few years. Obviously the sales evidence excludes the impact of CIL as once started, a development escapes CIL being due with a CIL being in place. Once CIL has been adopted in WODC, land prices are likely drop to reflect the new liability as the developer has to pay what is due upfront on start of work on site. However these sales will show the pre CIL market evidence of residential land values.

So I am surprised these sales have not been picked up and analysed by the Consultants - the fact that they are not based locally, let alone regionally, may be a reflection of their not being based locally or regionally.

As RICS Registered Valuers, I would have expected the Council's consultants to set out in some detail the prices achieved for this substantial range of sites sold in the District in the last few years. To be fair, they have researched new home residential property sale prices (per sq metre) in some detail but some of it seems to rely on "asking price" information rather than actual market sales evidence – not always clear on reading it.

In assessing CIL charging rates, establishing actual market prices for land does seem wholly relevant and not just relying on estimates based on residual valuations which are themselves notoriously prone to variability. Valuers should always prefer market evidence.

What developers actually pay to buy sites with a particular consent is a true reflection of the market, and S106 burdens can be reflected according to the facts for each site as each one will be different. Interestingly in Cherwell District, Montagu Evans, a national firm of Chartered Surveyors, analysed in the order of 70 sites when reporting to that Council back in 2016 on the draft CIL charging schedule.

NCS/HEB do not seem to have analysed any sites in WODC based on actual transactions of which there have been a good range. To me that appears like a serious omission.

Previous draft charging schedules for WODC suggested CIL should be applied for the Strategic Sites – in 2013 the figure was £200 per sq metre for all sites over 11 units apart from the AONB.

This was based on research and evidence of a market just coming out of a recession post 2008/9 when land values were depressed compared to what has been seen more recently. That conclusion was supported by a report by Aspinall Verdi.

A revised version was produced in 2017 in the lead up to the West Oxfordshire Local Plan enquiry when it was thought the CIL Charging schedule would be dealt with by the Plan Inspector. The proposed Strategic sites figure was reduced to £100 per sq metre, to reflect the additional infrastructure cost burden they were likely to bear via S106 contributions.

So now one must surely ask the question –“ how can a ZERO CIL charge be justified for these large sites when land values have increased (pre Covid admittedly) since 2012/3 when the first draft schedule was brought out?”

Furthermore, no analysis on development land value trends over the last ten years has been produced that would be a relevant cross check to this whole exercise in my view. There are Residential Development land indexes produced by various surveyors research departments and the VO.

In NCS viability calculations on commercial uses there is no land value market evidence produced that I can see to support their views on commercial land values - just a schedule of the values they have assumed. I believe it would be preferable to have some local market evidence to support their assumptions.

The respective reports visible on line by NCS and HEB are not signed by an individual Registered RICS Valuer which I believe they should be and depending on their PII cover, probably counter signed by another such person in the firm to demonstrate a Peer review has been undertaken. Has that been done? This should be clarified.

HEB's report, page 22 states, that their report cannot be published without their written permission and there is no evidence given of that having been given. Has it been? This may have PII implications.

3.2 Interpreting the Government Guidance on Viability

Establishing Existing Use Value (EUV) is pretty straight forward on greenfield sites - which in the case of most of West Oxon's sites and especially the Strategic Sites - with only the odd exception – it is the agricultural value – so somewhere between £7500 and £10,000 per acre (say £18,500 to £25,000 per hectare) depending on location, soil quality etc. Again no evidence has been provided as one might expect although the NCS figure of £20K an hectare is probably about right in my experience.

Establishing the Benchmark Land Value (BLV), the NPPF Guidance says in Para 12:-

“To define land value for any viability assessment, a benchmark land value should be established on the basis of the [existing use value \(EUV\)](#) of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements.”

NCS, WODCs consultants, in Para 3.24 of their report of January 2020 suggest that

“ We believe that the uplift in value resulting from planning permission should effectively be shared between the landowner (as a reasonable return to incentivise the release of land) and the Local Authority (as a margin to enable infrastructure and affordable housing contributions).

The % share of the uplift will vary dependent on the particular approach of each Authority but based on our experience the landowner will expect a minimum of 50% of the uplift in order for sites to be released. Generally, if a landowner believes the Local Authority is gaining greater benefit than he is unlikely to release the site and will wait for a change in planning policy.”

This approach they say was used in a planning appeal case (Shinfield) concerning the amount of affordable housing on a development – I note the appointed Inspector was not a Valuer by

profession but a Planner in the Shinfield case and also in the Rushcliffe case also referred to by NCS - where they acted for that Council.

That approach seems somewhat arbitrary to me, based on cases that I am not convinced are relevant and less than robust a negotiating position for a Local Authority seeking to capture value and thus monies to help fund local Infrastructure.

Whilst Cherwell DC have yet to adopt a CIL charging schedule, back in 2016 they employed Montagu Evans a national firm of Chartered Surveyors to do a report and their figures are summarised in my Annex1 along with other current CIL rates for adjoining or nearby Oxfordshire District Councils which I feel are worth comparison. They were mostly adopted in 2016 and indexed since, but haven't been reviewed in the light of the new guidance as far as I am aware.

3.3 A suggested alternative approach

A landowner will always want the most value he can get out of his land – that is human nature and is why agents (like I used to do) always seek to maximise competition between potential buyers and thus achieve the best sale price for their client.

However, if S.106 contributions to site and off site specific infrastructure costs, affordable housing requirements etc plus in addition a given level of CIL imposed all combine to reduce what developers are prepared to pay for residential development land to well below what values have been paid to date, then market prices will fall.

When owners come to realise that, whereas in the past they have benefited from a majority of the uplift in value on the grant of planning consent, from now on the amount the Community receives will be greater and what the owners receive will be much less (indeed this likelihood is hinted at in the latest White Paper “Planning for the Future”). At that stage, owners will gradually have to adjust to the new circumstances and be prepared (albeit reluctantly no doubt) to accept a figure I believe could settle around ten times existing use value (rather than 50 or more times EUV that has been the case recently).

In my own experience when dealing with affordable housing “exception” sites I found that landowners were prepared to sell their land for such developments at around £100K per acre (£250K per ha) – that works out at about ten times EUV.

Imagine that you own something and someone offers you ten times what its existing value is; it is my contention that most reasonable owners would jump at such an offer.

It is only because of what has happened in the past to development land values that landowners expectations have become so high; politicians have tried, over the years, through various types of taxation (eg Development Land Tax) to capture some or all of the uplift in value. This often resulted in landowners refusing to sell and waiting for a change of Govt and a more benign tax regime.

It is the Community that has created this development value by allocating /zoning land and granting planning consent and they should on balance receive the lion’s share of the uplift in value.

Now, politics has moved on I believe, and in my view there is only the prospect of greater land value capture by Council/ planning authorities/Parliamentary legislation. In my assessment, the sensible owner will have little choice but to take what he can get and be thankful. Ten times EUV or thereabouts could become the norm and be seen as a sufficient premium to persuade a reasonable owner to sell. Obviously landowners will not be as happy but may have little choice but to accept the new scenario.

Moreover if a Conservative Govt is now seeking more land value capture, a change of Government would almost certainly see a greater level of value capture under a Labour Government.

In effect the writing is on the wall for landowners in this market.

In HEB surveyors viability calculations on the Strategic Sites they allow anywhere between £674K per acre and almost £1million per acre on the Eynsham and Witney sites for the landowners price (Land Cost) and a 20% profit for the developer. I think the latter is a generally accepted expectation in the market and in current viability valuation models/programmes – in boom times that rate has been nearer 10%. Montagu Evans used 17.5%.

I believe the premium over EUV that HEB/NCS have attributed to land cost is too high. In fact it is not clear that HEBs figures reflect the 50% split of uplift in value between the owner and the Council suggested by NCS.

By comparison to the developer/ housebuilder, the landowner faces little or no serious risk and his land is only increased in value as a result of the planning consent granted by the Community. So landowners need to bear the brunt of CIL's impact by receiving less for their land - the actual CIL will be paid by the developer/housebuilder, so he will drop the price he pays to the owner to reflect the CIL due on commencement of development.

NCS suggest the uplift in value should be shared equally between the owner and the Council. There is nothing in the NPPF guidance which says this is to be the normal split. It says "a premium over existing use that will persuade a reasonable owner to sell."

My contention is that if the developer pays less for the land, in reality there is scope for CIL to be paid - enabling greater contributions to the considerable local Infrastructure shortfall in the WODC area (estimated to be currently c £190million prior to any CIL being levied). Whilst the owner would be getting less than previously, the premium of ten times EUV cannot be said to be unreasonable – getting fifty times or more of EUV does seem, by comparison, disproportionate or an Euromillions rollover win.

If the fall back position is that the owner's land is not granted consent and reverts to agricultural existing use value – given that stark choice, few owners would refuse ten times EUV in my view. Development Corporations were enabled to buy land at EUV in the 1950s/60s and it would not surprise me to see that sort of thing happening again.

It is for the above reasoning that I believe the WODC Community could be missing out really badly if, as currently proposed, no CIL is charged at all on the Strategic Sites (involving 5840 dwellings or over a third of all the new homes proposed in WOLP).

As a consequence, the Community in WODC would not receive the additional monies that could and should be theirs

to invest in their local infrastructure – this shortfall on infrastructure investment has been the failure of the planning system over much of the last 70 years and now needs addressing; it may well be in the Governments White Paper “Planning for the Future”, just published and being consulted on.

The Planning White Paper suggests that sites up to 40 or 50 units might be released from the need to provide affordable units and if this happened the potential margin for CIL would be enhanced so maybe the Schedule should be flexible to increase rates were this or any other policy change affecting land value to happen in the near future.

3.4 Comments on NCS/HEB Viability calculations for the Strategic sites

If I understand it correctly NCS / WODC employed a separate firm HEB Surveyors to carry out the appraisal calculations – again it is not clear who has signed these assessment calculations off as the Registered Valuer. The Strategic sites seem to have been analysed with a different valuation programme (Vi.ab2) from the method used in the main body of NCS’s report – not clear why.

As suggested above, HEBs report gives no specific evidence of recent residential development land sales of which there are plenty and unaffected by CIL implications. One would have expected some of these to have been produced and appropriate analysis of each sale carried out as a market evidence based cross check.

One has to ask why HEBs report refers to 2012 RICS Guidance Note on Viability in Planning (perceived by 2018/9 to be out of date following the revised NPPF and Guidance from Govt) and as a result is currently under review - the consultation closed back in February 2020 (with 500 plus responses received I am told by RICS) but RICS inform me that due to the Covid lockdown the final version has yet to be published (possibly this autumn).

However, one might have expected reference to all this in HEBs report as they must have seen the draft consultation document issued by RICS last autumn. Their report should surely align with the very latest, albeit draft, Guidance from the leading property professional body.

In the various appraisals for each SDA, HEB appear to infer land cost for market value housing as being the same as for affordable housing – albeit using different prices per ha depending on the site location. This seems an anomaly to me. My experience is that land values for affordable housing are generally much lower than market value housing.

I would question also why East Witney land value is about £100K per ha greater than the value attributed to North Witney. I would have expected them to be virtually the same, as the proximity of the A40 (noise etc) is a detracting factor for East Witney.

In their part of the appraisal report, there are some very large costs allowed for in the respective calculations for each Strategic site without the level of detail that one would expect to support a figure such as £39.2million (the abnormal at North Witney by way of example) – I think someone should explain how these figures are calculated in rather more detail as they have a significant bearing on the conclusions reached. Did some of the figures come from the developers? Or have they relied wholly on Gleeds costings input? Might I suggest more transparency please?

4. Conclusion

Using my suggested approach with a lower Benchmark Land Value of ten times EUV, there should in fact be scope to charge CIL on these Strategic sites even if it needs to be reduced from the basic rate of £125/sq metre for medium value zone. As the Strategic sites are all in Medium value zones and Salt Cross possibly partly in a high zone (not easy to be sure off the Plan), their rate should reflect their market location to be consistent.

I would propose that each Strategic site should, initially, pay £25/sq metre but deferred two years from the commencement of the site development; at that stage, all the actual figures should be analysed in detail once all the actual costs are known and if there is scope to pay more, additional CIL would be charged as houses are sold, on a roof tax basis to assist with developers cash flows over a lengthy scheme life - in most cases in the order of five years plus and nearer ten years in the case of Salt Cross. Likewise if the

result proves no better than break even, no further CIL would be due.

If the developers/housebuilders cannot make a profit they would not build the houses but the key is not paying too much for the land. Paying too much for the land would not be an excuse for not paying CIL.

I would invite the Consultants to run my suggested figure through their valuation software programme and see what the answer might give.

In following my suggestion, the local community “purse” in West Oxfordshire could receive, as a minimum, in the order of £13 million - based on 5840 dwellings and an average dwelling size of 90 sq m at £25/sq m - from the Strategic Sites - instead of the current proposal for ZERO.

If the full basic £125/sq m rate proved to be justified on the eventual facts, then the CIL due to WODC could be either side of £60 million. That is a very large sum to miss out on based on the current advice given in the NCS/HEB report.

One has to pose the question - have the respective consultant firms got sufficient PII cover should their current advice be accepted and relied on by the Inspector and WODC, but subsequently shown to be insufficiently robust as a result of which the WODC community miss out on that level of funding? Hence my suggesting that they have another look at their figures and test my suggested approach.

I would like to be a party at an hearing held by the Inspector w]as and when one is appointed.

Harry St John
21st August 2020

Annex 1

Sites sold for residential development over the last four years or so in West Oxfordshire

This list is by no means comprehensive but summarises the Sites acquired either in the open market where either a promoter obtained consent and housebuilder purchased or where a housebuilder or consortium had secured an option, obtained a consent and then exercised the option to buy the site from the owner:-

- **Shipton under Wychwood** – Deanfield Homes 44 units.
- **Milton under Wychwood** – McTaggart and Michel – 60 units. (Consent won on appeal by Sharma Homes).
- **Chipping Norton** - Bellway Cotswold Gate 228 units.
- **Burford** - Lioncourt Homes – 169 units on Shilton Road.
- **Carterton** - Bloor Homes – 700 units at Carterton East.
- **Minster Lovell** – Bovis 126 units.
- **Bampton** – Cala Homes* and Taylor Wimpey – two sites both c 150/160 units.
- **Aston** – two sites both about 40 units each.(*one site)
- **Stanton Harcourt** – Hayfield Homes site on old airfield 63 units.
- **Eynsham** – Thornberry Green – Taylor Wimpey c 160 units.
- **Woodstock** - Blenheim Pye 300 units.
- **Tackley** - Barwood Homes – 70 units* and Deanfield Homes 26 units.
- **Long Hanborough** – Bloor Homes 120 units; Pye/Blenheim 169 units; CALA Homes – on Church Hanborough Road - 50 units.
- **Freeland** – Mears Homes – 41 units.
- **North Leigh** – Bellway Homes two sites either side of New Yatt Road 76* and 40* units; Bewley Homes 50 units by A4095.
- **Witney** – David Wilson Homes- Kingfisher Meadows on old Burford Road - c 260 units; Crest Nicholson- Colwell Green west of Downs Road c 257 units; North Curbridge – various builders working on SDA site for c.1000 units. (Consortium of Persimmon, Bovis and Bloors had an option from landowners and all three are building houses at present).

- **Gladman Homes won consent for a significant number of the above sites under promotion agreements and the sites were sold to housebuilders in the open market.**

In the Vale of White Horse, in the same period, there have been a number of land transactions in Southmoor/Kingston Bagpuise (at least three sites of 50 plus units) and Faringdon (at least three sites of c.200 units and one of 425 units*) - which are not dissimilar market locations to West Oxon being only just over the river Thames and similar distances between Oxford and Swindon.

NCS and or HEB could establish what they all sold for from speaking to agents/devlopers or the LR records.

*Sites I was involved with in various capacities, prior to retiring.

Other Oxfordshire District Council CIL charging rates.

Cherwell DC – proposed £100 /m² for low value areas, £230/m² for medium value areas and £270/m² for higher value areas on Oxford periphery and Kidlington/Yarnton (adjoining WODC eastern boundary) These figures were proposed in 2016 following a report on viability by Montagu Evans a firm of Chartered Surveyors based in London, but as yet no formal CIL charging schedule is in place yet.

Vale of White Horse DC

They are charging £140 /m² for most of district but in lower value areas ££99/m². – these apply across all site but certain strategic sites have a zero rate.

South Oxfordshire DC

They charge £182/m² across most of the district but in defined lower value areas £103/m². Again all sites pay these rates but certain large strategic sites have a zero rate.

Oxford City Council

They charge £148 /m² for all residential and almost £30/m² for commercial developments.

Harry St John
August 2020

[REDACTED]

From: Clerk [REDACTED]
Sent: 20 August 2020 16:37
To: Planning Policy (WODC)
Cc: Anita Knipe; 'Brian Prnham'; Jamie Rippin; Linda Burton; Samantha Garrett; Stephen Jones; Susan Adams
Subject: CIL consultation

Good Afternoon

While Standlake PC is broadly in favour of the proposals, the following should be taken into consideration. Smaller developments do not normally qualify for this levy but as the cumulative effect of these 'salami' additions to the village all add to the strain on infrastructure and, therefore, these piecemeal additions be taken into the calculation.

Regards

David

David C Bevan
Clerk to Standlake Parish Council
[REDACTED]

From: elizabeth stedman [REDACTED]
Sent: 17 August 2020 23:18
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: : CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

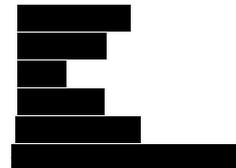
As a health visitor and resident I feel the increased need on health services for example is particularly concerning and ensuring new residents had access to open space and recreation facilities which I believe this levy would help towards.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Elizabeth Rasdall
[REDACTED]

Sent from my iPhone



Stewart Brothers Property LTD

19 August 2020

Ref: CIL Consultation Response.

Dear Sir / Madam,

I am writing in response to the Council's CIL Consultation. I would like to make the following comments:

1. The Future of CIL

The recently published Housing White Paper and CIL Review Panel Report make clear that the CIL is to be replaced by a new LIT which will be calculated by a nationally set formula. Further, that transition to the new charge should take place by the end of 2020.

The CIL review has found that in areas where CIL has been introduced housing supply has been negatively impacted. In the last few years the Council has only just met the Housing Delivery Test. Over the last 10 years the Council remains behind and the overdelivery hoped for in the local plan has not occurred. The Council remains dependant on Windfall sites and a 5YHLS which is both backloaded and calculated using the less than favorite "Liverpool" method. Further, it is likely that the Council will not meet the Housing Delivery Test this year due to Coronavirus.

As such I feel the Council are using resources imprudently by continuing with this CIL process.

2. The Effect of Coronavirus

The evidence base supporting the council's CIL process was mostly collected during 2019, although some appears to date to 2015. The impact of Coronavirus is as yet unknown but will be significant on the whole economy for probably a decade or more. Whilst the housing market may be experiencing a post lockdown mini boom, there is nobody who believes this will last until the autumn. National debt will soon reach post Second World War levels and recession is inevitable with several hard years of recovery to follow, possibly even decades.

As such the evidence base is now simply out of date and unsuitable for this process.

3. Variable Rate CIL Regime

The valuation data in Appendix 1 of the CIL report (P26 Hub Report) does not appear to demonstrate that a variable CIL rating is justified. For example, the table shows that 17 Skylark Way, Witney sold for £3,585 per m². However, 21 Masons Grove, Witney sold for £4,554 per m², almost 30% more. Yet these properties fall within the same charging area. Similarly, the table at page 34 of the Hub report shows various developments within the various charging areas. The examples are not consistent and certainly do not justify the Council's position. Put simply some of the values in the high area are lower than the medium areas. Further to this I fail to see how referencing "Zoopla" can be considered a reliable sense check. Therefore, I struggle to see how the "Indicative Residential Value" table at P24 of the Hub report, which is replicated in the CIL report, can be accurate.

Feeding this into the wider CIL report, it appears the council have not robustly justified that a variable rate CIL is suitable for the district.

4. Gleed construction Cost Survey

The costs laid out in this part of the evidence base is somewhat lower than those achievable by smaller developers such as ourselves. The study appears to have been done using data suitable to large scale house builders who enjoy massive economies of scale and buying power.

As noted in the Local Plan the Council have a great dependency on small windfall sites for their housing delivery. These sites are built out by small developers. It appears the CIL evidence has not accounted for this and no research has been done to ascertain the build costs related to these smaller sites.

As noted above the research does not account for the additional costs which will be being incurred due to Coronavirus.

5. Land Values

There does not appear to be anything in the evidence base to support estimated land values?

6. Greenfield /Brownfield

The report makes clear that the proposed CIL changes are based on greenfield development examples and acknowledges that some brownfield sites may become marginal as a result of the CIL. This approach does not accord with national policy of encouraging brownfield development. In fact it is an admission that the proposed CIL will penalise brownfield sites.

7. Proposed CIL Rate (general)

The proposed CIL rates appear to be prohibitively high when compared to the adopted CIL schedule in neighbouring districts. For instance, Cotswold District charge £80 (subject to indexation) per m² for all residential sites except for their Chesterton Strategic Site where the charge is zero. Vale of the White Horse charge £85 / £120 (subject to indexation) per m² for residential development and again zero for their strategic sites. Oxford city charge £148.48 (indexed) per m² for residential development

Most of the charges proposed by West Oxfordshire are considerably greater than these adopted charges and the evidence supporting the charges appears to be weak and inconsistent. In reality such charges will serve only to make non strategic windfall sites unviable when the Council remains dependent on such sites, as noted in the Local Plan, to meet the Housing Delivery Test.

8. Proposed CIL Rate (sites of 1 -10 dwellings)

The council have proposed a CIL rate for smaller sites (less than 11 dwellings) which is double the rate for sites of 11+ dwellings.

The Council state at paragraph 6.14 of the Viability Report that this reflects the likely affordable housing exemption and the S106 payments which usually apply only to larger sites.

Smaller sites enjoy a general exemption from affordable housing and S106 specifically to improve their viability. There is no policy basis for charging an increased CIL on these smaller sites because they enjoy these exemptions. In reality, such an approach is the exact opposite of national policy.

The adjacent Vale of the White Horse District Council made a similar proposal in their emerging CIL policy with regard to sites of less than 11 dwellings.. They accepted during the CIL process that such an approach could not be justified and reverted to a single charge for sites of all sizes.

An approach which penalises smaller sites cannot be justified and is contrary to national policy which encourages support for smaller developers. It will also have a substantial negative effect on the delivery of small windfall sites which the Council are dependant on.

Regards



Stewart Brothers Property LTD

From: Sarah Summers [REDACTED]
Sent: 20 August 2020 10:41
To: Planning Policy (WODC); Jeff Haine
Subject: CIL Consultation Response / East Chipping Norton Development

Dear Mr Chris Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Clarity is needed on viability grounds... if the costs are so great, then maybe the development is not a viable proposition. Quality of life is very important, especially in these times. An increase in housing means more people (increased population), so logically the corresponding infrastructure would be necessary to accommodate this increased population & traffic; added roads, healthcare facilities, schools, and community services, etc. The roads are already congested with more traffic, and no corresponding infrastructure has been put in place to accommodate what has already been developed over the last few years. No doubt school rooms would be crowded. Council tax rates are already very high, another facet to consider.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come—indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Dr Sarah Summers
[REDACTED]

From: Bridget Tennent [REDACTED]
Sent: 17 August 2020 15:01
To: Planning Policy (WODC)
Subject: CIL Payments

Dear Mr Hargreaves

I note from your website you are proposing to introduce CIL Payments to the West Oxfordshire district. It seems counterintuitive therefore not to include them as part of the East Chipping Norton Development. I understand that they have been included in all the consultation documents thus far. (minutes from a meeting with the Town Council in 2017 which say ' Mr C Hargreaves stated that CIL money would go towards the infrastructure of the town'. Please do not make a U-turn on this statement.

I urge you to include CIL payment to be levied in order for local people to have some say in their future.

Yours sincerely

Bridget Tennent

local resident




12th August 2020

West Oxford District Council

By email for the attention of Chris Hargraves and Cllr Jeff Haine.

Dear Mr Hargraves and Mr Haine,

EAST CHIPPING NORTON STRATEGIC DEVELOPMENT AREA - CIL vs S106 and other comments

You might remember me as a Chipping Norton Councillor of 9 years standing 5 of which were also as Mayor - I am writing this letter primarily as a long term resident of Chipping Norton (over 20 years) but also as a current councillor to express my concern that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

As you are well aware the East Chipping Norton Strategic Development Area will increase the size and population of our town considerably and will therefore put pressure on our already over-stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Chipping Norton Town Council have produced a well written document called their VISION STATEMENT which I am sure you have read and which clearly states most of the wishes of the Town and I agree with a very large proportion of this document except for the authors' wish to avoid the Cotswold Vernacular when it comes to house design. It is my belief that the vast majority of people in this area (and incomers into this area) actually like the 'Cotswold Vernacular' and want to get away from some fairly ghastly modern architecture you see elsewhere - I am sure that the 'Vernacular' can be adopted and built to encompass the 'green' solutions that everyone requires. It is worth noting how many visitors to Chippy actually comment on how good the Cotswold 'Gate development

fits into the landscape - even though there are some scathing remarks likening that development to a Legoland

As regards CIL I have to remind you both that we (CNTC) have had many discussions about ECNSDA over the last nine years or so with WODC/OCC/Cala Homes/Carillion and others and one 'carrot' that has always been dangled in front of us has been the prospect of a considerable sum of money to spend on improving the infrastructure of this town under the control of the Town. However, I am beginning to come around to the position that it is important that this infrastructure upgrade should be built and planned by the experts (ie OCC and WODC) PROVIDING that the wishes of the community are heeded as far as they can be and that 'our' ideas should be looked at, discussed and if practical should be included in any masterplan.

But I have to say that I also have a lot of sympathy with those that say It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed - but this could be done with solid S106 agreements agreed with Town in good time BEFORE any documents are signed. The main argument I see for CIL is that the money is controlled by the Town whereas S106 is controlled by third parties without in depth local knowledge (ie they don't live here!).

I hope that common sense will prevail here but solid interaction with the Town and Town Council will help.

Yours sincerely

A large black rectangular redaction box covering the signature of the councillor.

Councillor Mike Tysoe

20 August 2020

Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

By email only: planning.policy@westoxon.gov.uk

Dear Sir / Madam

West Oxfordshire Community Infrastructure Levy Draft Charging Schedule Representations 2020

On behalf of our client, Universities Superannuation Scheme Limited (USS), we are writing to respond to the West Oxfordshire District Council Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS) published for public consultation until 21 August 2020.

USS is a major investor in Witney and as such has an interest in the formulation of local planning policy. USS previously submitted representations to the former CIL Draft Charging Schedules in 2014, 2015 and 2017.

Draft Charging Schedule March 2020

The Council's current proposed CIL rates for non-residential developments are as follows:

Non-residential CIL (District-wide)	
All non-residential uses (excepting retail)	£0 per sqm
Food supermarket retail (A1)	£100 per sqm

We note that there is a reduction in the non-residential CIL charge for all retail uses except food supermarket retail in comparison with the Revised CIL DCS published for consultation in 2017. The previous DCS proposed £175 per sq m for all A1-A5 uses outside designated town centres and £50 per sq m for the same uses in designated town centres. We support this revised approach exempting most commercial uses from CIL.

We do, however, seek further clarification on the district-wide approach for food supermarket retail. We note that there is no distinction between CIL charges proposed for food supermarket retail in town centres and areas outside designated town centres.

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 1 New Street Square, London, EC4A 3HQ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NSE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NSE LLP do not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms. Real Estate Services regulated by RICS.

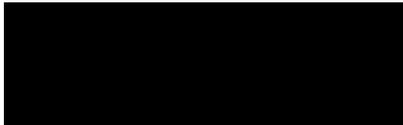
We recommend that the CIL charge specifically for food supermarket retail (A1) in designated town centres is reduced to protect the viability and vitality of Witney town centre and support the town centre first approach, and that the modification is set out within a Revised CIL Charging Schedule, prior to submission for examination in September 2020.

The CIL charging table should also be made clearer. The heading “All non-residential uses (excepting retail)” should be updated to say “All non-residential uses (excepting food retail)”. We presume the schedule will also be updated to take into account the revisions to the Use Class Order giving timings.

In addition, we seek clarification on whether an updated CIL Regulation 123 List will be published, as it does not form part of the current consultation and we reserve the right to comment on this further.

If you have any queries in regards to these comments, please do not hesitate to contact my colleague Amy Hartley (amhartey@deloitte.co.uk / 020 7303 5937). In the meantime, I would be grateful if you could confirm receipt of this letter.

Yours faithfully

A solid black rectangular box used to redact the signature of Mark Underwood.

Mark Underwood
Deloitte LLP

[REDACTED]

From: Sean Vassen [REDACTED]
Sent: 06 August 2020 17:09
To: Planning Policy (WODC)
Cc: jeff.haine@westoxon.uk
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched and weak infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town. In particular we need the following examples looked at:

The increased traffic and pollution - this will particularly impact the pinch point on the A44 by the Blur Boar Pub, where there have already been records of the highest pollution in Oxfordshire and numerous accidents involving vehicles hitting pedestrians

The already restricted parking in the centre of town - as a resident who has no allocated parking space and no residents parking facility it is already a very frustrating situation to park a car

There are no facilities for the younger members of the community in town - with the increase of population this may promote more anti-social behaviour

The town is desperate for some new cultural investment e.g. a cinema

The health centre is already having issues with the current number of patients that they are looking after

The general community infrastructure barely manages with the current size of the town

The general well-being of the town is not going to be improved by no investment in the existing town centre

These are just a few that have come to mind.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Anthony Sean Vassen

[REDACTED]

[REDACTED]

[REDACTED]

Sean Vassen

M: [REDACTED]

[REDACTED]

[REDACTED]

This electronic mail is confidential and is intended for the named addressee(s) only. If you are not a named addressee, on no account should you copy or disclose any part or details therein to a third party without the prior written consent of Sean Vassen. If you have received this message in error please notify the sender immediately and delete the electronic mail and any attachments. Any views opinions or advice contained in this document are solely those of the originator and do not necessarily represent those of Sean Vassen. The contents of this electronic mail do not give rise to any binding legal obligation upon Sean Vassen unless subsequently confirmed on headed business notepaper sent by fax letter or as an electronic mail attachment. Sean Vassen takes no responsibility for any loss of data and/or damage caused to the recipient's computer system(s) which may occur as a result of this electronic mail be it by attachment virus or any other method known or otherwise.

Please consider the environment. Do not print this e-mail unless you really need to.

From: Clare Walton [REDACTED]
Sent: 19 August 2020 16:59
To: Planning Policy (WODC)
Subject: CIL consultation response/ East Chipping Norton
Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Clare Walton
[REDACTED]

From: Emma Walton [REDACTED]
Sent: 21 August 2020 12:21
To: Planning Policy (WODC)
Cc: jeff.haine@westoxon.uk
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

I'm particularly concerned about the amount of HGVs coming through the town which seem to have increased over the twelve years that I have lived here, and the subsequent levels of pollution.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Emma Walton

Emma Walton
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: Kate Ward [REDACTED]
Sent: 20 August 2020 23:26
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Developmen

Dear Mr Hargraves,

As a resident of Chipping Norton I am appalled to learn that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) by this being set at a zero rate (as proposed in your consultation paper). I ask you to ensure that this does not happen.

The East Chipping Norton development will increase the size of our town considerably, perhaps even doubling the population. Inevitably this will put pressure on our already stretched infrastructure and threaten the qualities that make Chipping Norton a good place to live. Many of us, including myself, have chosen to make our home in Chipping Norton because of the size of the town and the sense of community which it manages to engender.

This quality is worth protecting. It is what has led to Chipping Norton's current "success" as a market town with its own identity and expressions of 'loyalty' from its residents. Whilst it is hard to prove exactly what generates this sense of community, it is essential that improvements in infrastructure and community facilities are made to accommodate this rapid growth in the town so as to integrate new arrivals so that they too identify with the Chipping Norton community and do not just to see their home as a convenient dormitory.

When this major development was originally proposed we were promised that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come. I ask you to honour this promise.

Yours sincerely,

Kate Ward

[REDACTED]
[REDACTED]
[REDACTED]
Home: [REDACTED]
Mobile: [REDACTED]
email: [REDACTED]

From: Hannah waters [REDACTED]
Sent: 05 August 2020 20:48
To: Planning Policy (WODC)
Cc: [REDACTED]
Subject: North Witney CIL reduction

Dear Sirs,

I write to strongly object to WODCs proposal to reduce the CIL for the development of North Witney. As I am sure you are aware this is a very controversial development which has raised many many concerns for the local community. Flooding, road congestion, access to schools, deprivation, loss of green space and ecology issues have all been serious concerns that the community believe have been overlooked.

WODC had the opportunity to deploy funds from the CIL to mitigate some of the concerns that have caused deep upset within the community. The proposal to reduce the CIL is robbing the local community of much needed funds for critical social community assets that should be provided in conjunction with such large and overbearing development.

I strongly object in the way in which this proposal has come forward without any consultation with the local community and seemly completely bypassing the democratic process.

I would like to formally register my objection to this proposal and would appreciate a detailed explanation from WODC as how the can justify the proposal and explain how community infrastructure is going to be provided without these vital funds.

Yours sincerely,

Hannah Waters

[REDACTED]

From: Harry Waters [REDACTED]
Sent: 07 August 2020 11:57
To: Planning Policy (WODC)
Cc: Graham Knaggs; robert@robertcourts.co.uk
Subject: Objection to zero rated CIL

Dear Sirs

I have been informed by Hailey Parish that WODC is proposing to offer a reduction in CIL for the North Witney Development.

I wish to object to this proposal in the strongest possible terms for the following reasons;

1. Hailey Parish were very clear in its objection to the North Witney Development that the scheme was financially unviable. Despite this WODC made representations to the Planning Inspector that the scheme was financially viable. WODC have now reversed their view despite and increase in house prices. One has to assume that WODC have demonstrated incompetence or have misled the inspector given the strength of evidence presented by the Hailey Parish at the time. I would be grateful for an explanation
2. The CIL is there to fund critical infrastructure and community assets. Again the Parish and North Witney Action Group has consistently highlighted the poor road, flooding and sewage infrastructure and the need to address this prior to any development. Please detail how this infrastructure will be delivered in absence of the CIL
3. This decision seems to have been proposed without any public consultation. Given the development is within Hailey Parish which objected to it and it received over a 1000 objections from the NWAG, WODC should appreciate this is a highly emotive development. Many of the objections could be part mitigated by clever deployment of the CIL. If WODC continues down this route it will rob the community of approximately £10m of funding to address key concerns whilst circumnavigating the democratic process. This may be legal but certainly not ethical.

Kind regards

Harry Waters

Harry Waters
Commercial Director



m: [REDACTED] e: [REDACTED]
www.agrivert.co.uk

This e-mail and any attachments are intended for the named recipient(s) only and may contain confidential information. If you are not one of these recipients you should not disseminate, distribute or copy this e-mail. The sender therefore does not accept liability for any errors or omissions in the contents of this message or in respect of viruses. Agrivert reserves the right to monitor all e-mails sent from its systems.

All Agrivert companies are registered in England & Wales with Registered Office at Bloxham Mill Business Centre, Barford Road, Bloxham, Oxfordshire, OX15 4FF, UK. The parent company is Agrivert Renewables Limited, registration number 11504386.

[REDACTED]

From: Jeremy Wellingham [REDACTED]
Sent: 14 August 2020 12:08
To: Planning Policy (WODC)
Cc: Jeff Haine; cntownclerk@btconnect.com
Subject: CIL consultation response/ East Chipping Norton Development

Home: [REDACTED]
Mobile: [REDACTED]
e-mail: [REDACTED]

[REDACTED]

14 August 2020

Mr Chris Hargraves
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney, OX28 1PB

Dear Mr Chris Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is also important to the democratic process that an element of decision making is made at the local level by those it directly affects. Having the CIL contribution available to the Chipping Norton Town Council would give real effect to local decision making.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come—indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely,

Jeremy Wellingham

Cc: jeff.haine@westoxon.gov.uk
planning.policy@westoxon.gov.uk
cntownclerk@btconnect.com

Jeremy Wellingham

e: [REDACTED]
t: [REDACTED]
m: [REDACTED]



Virus-free. www.avast.com

From: Chris Hargraves
Sent: 24 August 2020 14:38
To: Planning Policy (WODC)
Subject: FW: East Chipping Norton Development

From: Nancy Whitfield [REDACTED]
Sent: 19 August 2020 15:57
To: Chris Hargraves
Cc: Jeff Haine
Subject: East Chipping Norton Development

Dear Mr Hargraves and Mr Haine,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come - indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Regards
Nancy Whitfield



From: [REDACTED]
Sent: 19 August 2020 17:53
To: Planning Policy (WODC); Jeff Haine
Subject: East Chipping Norton Development

Dear Mr Chris Hargraves,

I am a resident of Chipping Norton and have just heard that the proposed East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

As I am sure you are aware, the East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

The traffic flow through Chipping Norton is already considerable and Horsefair is now only one of the most polluted roads in the County but also has incredibly narrow footpaths creating a very dangerous situation in a town with many parents of young children and also a large community of senior citizens. The pollution levels and the danger of traffic in this area alone are of great concern. Development of the size proposed will put a strain on local facilities such as Healthcare etc as well as potential clogging the access roads to these services. Obviously development is somewhat inevitable but to not have the funds to be able to create and deliver the needed community structures to cope with it would be an irreversible situation that would be regretted for generations to come

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Thank you for your attention and let's hope that the CIL will enable us to create a town extension that will be an example of what is possible in a community such as ours.

Yours sincerely,

ANDREW WILDMAN

[REDACTED]
[REDACTED]
[REDACTED]


[REDACTED]

From: Rebecca Williams [REDACTED]
Sent: 19 August 2020 08:46
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: East Chipping Norton Development Proposal

Dear Mr Chris Hargraves,

I am writing to you as a resident of Chipping Norton, who is very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The proposed development will substantially increase the size and population of our town, which is already fully stretched and under pressure as regards its infrastructure. If the town is to increase its size by this proportion then it is vital that improvements are made to the infrastructure and community facilities to accommodate the increase in population that this development will result in. There is already a problem with traffic in the town and resulting pollution, the health service in the town struggles to meet the needs of the current population, community services need to be developed and properly resourced, as do leisure and sports facilities which are nearly all provided by one sports centre, which is too little to meet the demand of the town and surrounding villages.

As an employee of a property development company, it is common to build in the CILS cost to any financial investment analysis, which I assume was done when the initial development proposal was considered and in this case the company/companies benefiting from the profits of the development should be investing in the local infrastructure development which will enhance the town's infrastructure and services as was promised in the initial development proposal.

I request that you reconsider you CIL rating for this development.

Yours sincerely

Rebecca Williams
[REDACTED]

[REDACTED]

From: stephen williams [REDACTED]
Sent: 17 August 2020 14:46
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/East Chipping Norton Development.

Dear Mr. Chris Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already overstretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

For nearly two years I have been pressing our Town Council and lobbying our County Councillor, Mrs Hilary Biles, to reduce air pollution and improve pedestrian safety by banning HGV's travelling through the town. Oxfordshire County Council have at last agreed to provide weight restriction signage and an alternative route for HGV's. Whilst the cost of these will be borne by OCC, Chipping Norton Town Council will require funds to provide facilities for our residents once weight restriction limits are implemented. This will mean improved pedestrian areas, improvements to our existing parking facilities and recycling areas, provision of open spaces etc all designed to encourage more tourists to the town which will in turn have a positive effect on our ailing High Street. By filling the empty retail outlets in the town West Oxfordshire D C will benefit with an increase in Business Rate income.

Without a CIS levy being implemented Chipping Norton Council will not be able to afford the facilities mentioned above and the residents of the town will, once again, not see the benefits of the East Chipping Norton Development. All they will see is a vast housing development which will not benefit the town at all, in fact most agree that it will have a detrimental effect. This is not a way to encourage the residents of Chipping Norton to support this development.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come - indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed. For far too long the residents feel we have been side lined and our views ignored by West Oxfordshire District Council.

Yours sincerely.

Mr. S A Williams.
[REDACTED]
[REDACTED]
[REDACTED]

From: Claire Williamson [REDACTED]
Sent: 17 August 2020 16:45
To: Planning Policy (WODC); Chris Hargraves
Cc: Jeff Haine; 'Georgia Mazower'
Subject: CIL consultation response/East Chipping Norton Development

Dear Mr Hargraves,

As a resident of Chipping Norton and one of The Lido's trustees, I read with concern that the proposed East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town dramatically, by around 30% according to the recent vision statement, and, quite rightly, the construction of up to 1,200 homes must come with developer obligations to provide for new facilities and infrastructure on site through section 106. I understand this is expected to include a new primary school and transport infrastructure, alongside the required social housing and green space provision and a focus on 'green' development. All that is to be welcomed as a minimum.

Over and above that, I question whether the secondary school has the capacity to absorb the additional numbers, so what provision is there to be for that? Also, given that each household is likely to add two cars to the already busy traffic on our roads, what measures are there to accommodate those – or mitigate their effects? While the fact that the new routes through the site are intended to "prioritise walking and cycling", experience shows that it only takes a bit of rain to induce many to drive even short distances across town, adding to the through traffic and associated pollution on the confluence of the A44 and A361.

As a major 'strategic' development there is a once in a lifetime opportunity for WODC to secure much needed investment, through CIL, in our town's many off-site cultural and recreational organisations, who will need to be ready to support and provide for such a significant increase in local population. Facilities like the theatre and Lido, as well as the rugby, cricket, football and other sports clubs are well run volunteer-led charities and fight hard for increasingly oversubscribed funding opportunities to ensure they remain accessible to the whole community.

Waiving the CIL for this development would be a huge missed opportunity to secure some of this much needed investment. I am far from convinced that the development's viability is threatened by an appropriate level of CIL and it is only right that those profiting from house building should be asked to also invest appropriately in both on and off-site infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what Chipping Norton was promised when this major development was originally proposed.

Best wishes,

Claire Williamson
[REDACTED]

E: [REDACTED]

M: [REDACTED]

Mr Chris Hargraves,
Planning Policy Team
West Oxfordshire District Council
Elmfield New Yatt Road
Witney, OX28 1PB

16 August 2020

Dear Chris,

CIL consultation response/ East Chipping Norton Development

As a resident of Chipping Norton, a planning graduate and with involvement in a number of the town's recreational and cultural facilities, I read with concern that the proposed East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town dramatically, by around 30% according to the recent vision statement and, quite rightly, the construction of up to 1,200 homes must come with developer obligations to provide for new facilities and infrastructure on site through section 106. I understand that this will include a new primary school and transport infrastructure, alongside the required social housing and green space provision and a focus on 'green' development. All that is to be welcomed as a minimum.

As a major 'strategic' development there is a once in a lifetime opportunity for WODC to secure much needed investment, through CIL, in our town's many *off-site* local cultural and recreational organisations, who will need to be ready to support and provide for such a significant increase in local population. Facilities like our theatre, rugby, cricket, football and other sports clubs and lido are well run volunteer-led charities and fight hard for increasingly oversubscribed funding opportunities to ensure they remain accessible to the whole community.

Waiving the CIL for this development would be a *huge* missed opportunity to secure some of this needed investment. I am far from convinced that the development's viability is threatened by an appropriate level of CIL and it is only right that those profiting from house building should be asked to also invest appropriately both in on *and off-site* infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what Chipping Norton was promised when this major development was originally proposed.

Yours sincerely

[REDACTED]

Graeme Williamson

[REDACTED]

From: Olivia Willis [REDACTED]
Sent: 18 August 2020 21:51
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Traffic has already increased over the past few years as new housing developments have grown resulting in traffic jams, pollution and difficulties crossing the road. In addition, it is also extremely difficult to get an appointment to see a doctor at the Health Centre (Covid19 has made it worse but it was already very difficult before Covid19 arrived). Although there is a nice, large health centre, they don't seem to have the resources to provide enough doctors/practitioners to meet the ever increasing demands of a significantly growing population.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Olivia Willis

[REDACTED]

From: Nicky Cayley [REDACTED]
Sent: 27 July 2020 10:29
To: Planning Policy (WODC)
Cc: Adam Clapton
Subject: Community Infrastructure Levy examination: Consultation on Draft Charging Schedule 2020

Dear Sir/Madam

Witney Town Council wishes to make the below response to the Community Infrastructure Levy examination: Consultation on Draft Charging Schedule :

Witney Town Council welcomes the opportunity to comment on the CIL charging schedule for future developments and recognises that Witney is an attractive place to live and therefore develop. Further housing is already agreed in the West Oxfordshire Local Plan 2031 within and just outside Witney, but this should not be to the detriment of the town's already stretched infrastructure. Due to its geographical location, transport links and other welcoming factors, the Town Council has confidence that if CIL was to be agreed for larger as well as smaller strategic developments, developers would still be interested so therefore the Town Council objects to the proposed charging schedule.

Clear, understandable data and models of various non-zero-rated CIL rates for larger sites as part of this consultation would have provided more insight. The marginal negative calculations, which seem to be in contrast to and diverge from the conclusions of the Local Plan, are questionable inasmuch as they have inflexible land prices and do not anticipate how the market will react to CIL rates. The effects of Brexit and Covid-19 have had on prices is unknown, but could be significant, so a second independent valuation should be sought as soon as possible.

CIL benefits the whole community and Witney is already significantly underfunded in terms of sports, arts and youth provision for instance and these funds would contribute to those needed areas. While Section 106 funds have been greatly welcomed in previous years, there are projects which have fallen through (Cogges Link Road) where allocated funds have been lost due to their specific nature. CIL would offer more protection and value for money against this happening. In the Town Council's opinion, CIL as a proportion of contributions collected from developers would also make the transparency and transfer of developer contributions more efficient than the current Section 106 process.

Overall, Witney Town Council is concerned that these proposals in their current form appear to be favouring the interests of landowners, developers and their profits over the infrastructure of the town. While these may help deliver the long-term interests of the District Council, they result in the avoidance of developers paying CIL and a denial of discretionary funds to town and parish councils from the large developments that will impact them the most.

Kind regards

Nicky
Nicky Cayley B.A (Hons) CiLCA
Democratic Services Officer

Witney Town Council
Town Hall
Market Square

Witney
OX28 6AG

Direct Line: [REDACTED] - Calls to this number may be recorded for monitoring/training purposes.

Please note my working days are Monday – Thursday

: For more information www.witney-tc.gov.uk | Facebook - Witney Town Council | Twitter @witneytowncouncil
| Witney Town Council App search app store for Witney Town Council or download from



If please don't print this e-mail unless you really need to

This e-mail (including any attachments) may be confidential and may contain legally privileged information. You should not disclose its contents to any other person. If you are not the intended recipient, please notify the sender immediately.

Whilst the Council has taken every reasonable precaution to minimise the risk of computer software viruses, it cannot accept liability for any damage which you may sustain as a result of such viruses. You should carry out your own virus checks before opening the e-mail (and/or any attachments).

Unless expressly stated otherwise, the contents of this e-mail represent only the views of the sender and does not impose any legal obligation upon the Council or commit the Council to any course of action.

From: David Miles [REDACTED]
Sent: 02 August 2020 19:31
To: Planning Policy (WODC)
Subject: COMMUNITY INFRASTRUCTURE LEVY

I am responding today as the Witney Parish Transport Representative.

Section 106 agreements are often used to sustain or increase bus service provision through developer contribution. I accept that this will continue even if CIL is zero rated for strategic sites. There does seem a paradox that the larger the development the less CIL is paid but what I am concerned about is simply that developments make an adequate contribution.

The problem in West Oxfordshire is that the houses are built without the necessary infrastructure alongside it. This is a failure of the system and it is this which needs funding.

A public transport example is the Bradwell Village development between Carterton and Burford, a housing estate in a rural setting built without shops or public transport. This should not have happened and the purpose of CIL or section 106 should prevent this. This does not mean no to development but an insistence on better development.

West Oxfordshire has suffered very badly from the ending of bus subsidies in July 2016. Only now are some limited assistance becoming available as OCC comes to terms with the backlog of section 106 funding. Section 106 is more targeted funding and for that reason I regard it as potentially more useful than CIL with regards to public transport.

WODC have always tended to view public transport as not being their concern but economic development certainly is. Bus services are still infrastructure even though they are not physical infrastructure. It is important that whatever framework is operated on that this is recognised.

I will also make a plea for more public consultation. These funds are public funds whether CIL or section 106 but the public are never consulted. This is wrong and with any significant funding the public should be asked for their wishes as to how money should be spent. This should be used to form a judgement. I can say that I am not asked how money earmarked for public transport in Witney should be spent even though I have been the PTR for almost 30 years and I know this is the norm.

Most people are not really interested in the intricacies of CIL or section 106 but they do feel that if they have to accept development it should be mitigated. Too often this does not happen. Any new charging structure must attempt to rectify this.

DAVID MILES
WITNEY PTR

Subject: FW: Woodstock Town Council response to CIL and Affordable Housing SPD
Attachments: image001.emz
Importance: High

From: Janine Saxton [REDACTED]
Sent: 09 September 2020 11:54
To: Chris Hargraves
Cc: Christine Inker
Subject: RE: Woodstock Town Council response to CIL and Affordable Housing SPD
Importance: High

Good Morning Chris,

Please find below the response from Woodstock Town Council:-

CIL - Woodstock Town Council support this consultation

SPD - Woodstock Town Council made not comment

Kind Regards

[REDACTED]

Janine Saxton
Town Clerk
Woodstock Town Council

Recipients should be aware that all e-mails and attachments sent and received by Woodstock Town Council may be accessible to others in the Council for business or litigation purposes, and/or disclosed to a third party under the Freedom of Information or Data Protection Legislation. Views expressed by the sender may not be those of the Council. If you have received this e-mail in error please inform the sender and delete it.

This Council recognises that it has a duty to people whose information it holds to treat that information in accordance with statute. To download our privacy notice which explains how we use any personal information we collect about you, click this [link](#)

[REDACTED]

From: M WRIGHT [REDACTED]
Sent: 20 August 2020 19:16
To: Planning Policy (WODC)
Subject: Zero Rated CIL - OBJECTION

Dear Sirs

We would like to object to the Zero Rated CIL reasons as stated:

1. Inevitable loss of community infrastructure
2. The exclusion of local community involvement from infrastructure spending decisions
3. The second financial calculation in 2019 was based on incorrect supporting evidence in that contrary to the facts stated house prices did not fall

Yours faithfully

Marion and Geoff wright