

Town and Country Planning Act 1990 (as amended)

**Supplemental Proof of Evidence on Five Year Supply of
Housing
On behalf of Cherwell District Council**

In the following appeal:

Outline planning application for up to 120 dwellings, vehicular and pedestrian access off Ploughley Road, new pedestrian access to West Hawthorn Road, surface water drainage, foul water drainage, landscaping, public open space, biodiversity and associated infrastructure.

Access off Ploughley Road is not reserved for future consideration
Land East of Ploughley Road, Ambrosden, OX25 2AD

PINS Reference: APP/C3105/W/23/3327213

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February 2024



Inspectorate Ref: APP/C3105/W/23/3327213

Planning Application Ref: 22/02866/OUT

Appeal Site: Land East of Ploughley Road, Ambrosden, OX25 2AD

**Town and Country Planning Act 1990
Section 78**

**Supplemental Proof of Evidence on the Five-Year Supply of Housing
in Respect of Cherwell District Council**

**Prepared on behalf of
Cherwell District Council**

**Evidence of
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1.0 INTRODUCTION AND SCOPE OF SUPPLEMENTAL EVIDENCE

- 1.1 For the purposes of introducing this Supplemental Proof of Evidence I do not repeat my qualifications and experience that remain as set out within my main Proof of Evidence. The two documents should be read together.
- 1.2 This Supplemental material should also be read alongside my Rebuttal Proof of Evidence dated November 2023. This Rebuttal addresses the Appellant's original Proof of Evidence on matters relating to the requirement against which supply is to be assessed. The points addressed in my Rebuttal are unaffected by rescheduling of the Inquiry.
- 1.3 This Supplemental Proof of Evidence provides cross-references to the structure of my original Proof of Evidence. As far as possible I have sought to order supplemental material under the same structure as points addressed in my original Proof.
- 1.4 There is no completed Topic Statement of Common Ground addressing Housing Land Supply and Requirement matters at the point of submitting this Supplementary Proof of Evidence. However, I confirm that I have been engaged as part of other Appeals in the district appearing opposite the same expert housing land supply witness appointed by the Appellant for this case¹.
- 1.5 This has informed preparation of my Supplemental Proof of Evidence in terms of setting out my observations of the Council's assessment of deliverable supply and potential areas in dispute. I understand that the Appellant is preparing its own Supplemental Proofs of Evidence for this case and would welcome the opportunity to comment further on the Appellant's position on specific sites and sources of supply should I be invited to do so by the Inspector.
- 1.6 This Supplemental Proof of Evidence addresses the circumstances resulting in rescheduling of the original Inquiry Event (following publication of the December 2023 Authority Monitoring Report (CD/K.11)) and subsequent changes to national policy and guidance. The contents of this Supplemental Proof of Evidence are summarised as follows:
 - a. In **Section 2** I confirm the Council's published assessment of Housing Land Supply and address calculation of Local Housing Need for the Current Year
 - b. In **Section 3** I summarise implications of the Revised NPPF (December) 2023 including the extent of deliverable supply which is to be demonstrated (4 or 5 years)
 - c. In **Section 4** I outline implications of the relevance of recent Appeal Decisions in Cherwell District and changes to national planning policy in the December 2023 NPPF to the requirement against which supply is to be assessed
 - d. In **Section 5** I address the most recent results of the Housing Delivery Test and its relevance to this Appeal
 - e. In **Section 6** I provide observations regarding the Council's most recent assessment of supply including providing my position on sites and sources of supply where I anticipate the assessment of deliverable supply may be disputed
 - f. **Section 7** provides an updated conclusion based on this supplemental material. These updated conclusions should be taken as my Summary Proof of Evidence.
- 1.7 I confirm that this rebuttal evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I also confirm that the opinions expressed are my true and professional opinions.

¹ Most recently PINS Ref: 3326761 OS Parcel 1570 Adjoining and West of Chilgrove Drive and Adjoining and North of Camp Road, Heyford Park considered on the basis of the Council's position in the December 2023 AMR

Signed	
Name	Jon Goodall MA (Cantab) MSc MRTPI
Position	Director
Date	13 February 2024

2.0 THE COUNCIL'S PUBLISHED ASSESSMENT OF HOUSING LAND SUPPLY

2.1 This section supplements Chapter 4 of my original Proof of Evidence.

a) Overview of the Five Year Housing Land Supply Statement (Appendix 1 to the December 2023 Authority Monitoring Report)

2.2 The Council's most recent assessment of the 5YHLS is set out in the Housing Land Supply Statement (HLSS) contained within the December 2023 Authority Monitoring Report (CD/K.11).

2.3 The base date of the 5YHLS assessment within the HLSS is 1st April 2023. It is therefore agreed that the relevant base date for calculating the 5YHLS is 1st April 2023 and the five-year period runs to 31st March 2028.

2.4 This is understood to be agreed as the Council's most recent evidence for use during the Inquiry. This section provides a summary of the HLSS and its relevance to this Inquiry.

b) Matters Understood to Be Agreed

2.5 While I reserve the right to provide further information the following elements of the HLSS are presently understood to be agreed based on the contents of the draft Topic SoCG under preparation.

i) The Application of NPPF(Dec)2023 Paragraph 77 and Footnote 42

2.6 Paragraphs 4 to 12 detail the Council's conclusion that the housing requirement in adopted strategic policies of the Part 1 Local Plan requires updating. The Appellant has indicated that this will be agreed via the draft Topic SoCG (CD/G.5). Local housing need for Cherwell District therefore applies for the purpose of calculating the five-year requirement against which supply should be assessed.

ii) The Appropriate Buffer

2.7 Upon publication the HLSS confirmed a 5% buffer applies (see paragraph 22). The December 2023 AMR was published before revisions to the NPPF on 19 December 2023 and publication of the 2022 Housing Delivery Test ('HDT') Result (see CD/H.7). In accordance with paragraph 77 of the revised NPPF(Dec)2023 I understand it will now be agreed that no buffer is to be applied for the purposes of the requirement against which supply is to be assessed (see Section 5 of this Supplemental Proof of Evidence).

iii) Small Sites with Planning Permission

2.8 In relation to Small Sites With Planning Permission, I note that the published assessment does not contain a schedule of specific sites. Nevertheless, details of sites within this category fall under part (a) of the NPPF2023 definition of deliverable and should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

2.9 The definition of deliverable for this category of sites does not support application of a lapse rate without specific clear evidence to rebut the presumption of deliverability. The corresponding totals for detailed permissions in the most recent assessment are 62 units' supply in Banbury, 45 units in Bicester and 202 units elsewhere in Other Areas (309 units total) and it is my understanding that the Appellant does not seek to contest this component of deliverable supply.

iv) Lapse Rate

2.10 The published HLSS does not include a 'lapse rate' or allowance for non-implementation.

This is not a requirement of national policy, which dictates that the assessment should be informed by the conclusions on deliverability of specific sites. It is my understanding that the Appellant does not seek to adduce evidence on the application of a lapse rate.

c) Matters Understood to be Not Agreed

2.11 While I reserve the right to provide further information it is my understanding that there are only three main elements in dispute between the parties with reference to the contents of the published HLSS.

i) Windfall Allowance

2.12 Paragraph 39 confirms that a windfall allowance of 125 dwellings per annum is applied from year 4 of the forecast period only. Based on my experience of engaging with the Appellant's witness on other cases using the December 2023 AMR as the basis for the Council's position I anticipate the contribution of supply from this component will be disputed and address this further in my Section 6 to this Supplemental material.

ii) Calculation of the Standard Method

2.13 Paragraph 18 within the HLSS and the subsequent calculation following paragraph 41 illustrates that the five year requirement is derived from the calculation of a local housing need of 710 dwellings per annum (row b). This reflects the inputs at the time of publication of the AMR. Paragraph 18 also states that *"the latest government standard method figure for Cherwell will be used in any future updates on supply"*.

2.14 The Council's position for this Appeal provides for a calculation of local housing need of 703 dwellings per annum. This corresponds to the latest inputs to the calculation in accordance with national policy and guidance. The same position was agreed in evidence for the NW Bicester Inquiry (CD/M.19) and Finmere Hearing (CD/M.57). The Council's case to rely on the latest inputs to the calculation was supported in the Decision Letters for the Milcombe and Hempton Hearings (PINS Refs 3324704 and 3325113) (CD/M.58 and CD/M.59).

2.15 The justification for the Council's position is provided in sub-section (d) to this section of my evidence.

iii) The Requirement Against Which Supply Contributing Towards Part of Oxford's Unmet Needs is Assessed

2.16 Paragraphs 13-16 of the HLSS and Paragraph 42 and the table that follows deal with the separate housing requirement in adopted strategic policies of the Local Plan Partial Review making provision towards part of Oxford's unmet needs.

2.17 The HLSS confirms that a separate assessment of supply is provided against the requirements of the Partial Review. The Appellant does not accept this aspect of the requirement against which supply is assessed. This corresponds to Section 5 of my original Proof of Evidence and Section 4 of this Supplemental material.

iv) Assessment of Deliverability and Supply from Specific Sites

2.18 The published forecast for deliverable sites is contained within a Housing Delivery Monitor appended to the HLSS with commentary provided to summarise a range of information used to confirm judgements on deliverability (see for example Paragraphs 28 and 42).

2.19 A separate Housing Delivery Monitor is provided for sites identified to contribute towards part of Oxford's unmet needs. The HLSS includes the following units forecast supply for the separate requirement figures against which supply is assessed:

- Cherwell District (excluding sites contributing towards Oxford's unmet needs): 4,121

units 1 April 2023- 31 March 2028

- Local Plan (Part 1) Partial Review (sites contributing towards Oxford's unmet needs):
80 units 1 April 2023- 31 March 2028

- 2.20 I address potential sources of disputed supply that may be identified within the Appellant's position ahead of the exchange of Supplementary evidence together with changes affecting the published assessment of deliverable supply in my Section 6 of this document.
- 2.21 The published HLSS addresses these sites within a separate schedule of the Housing Delivery Monitor Document (at Appendix 1). Paragraph 42 provides a summary that progress towards delivery has been made to substantiate the assessment of only 80 units' deliverable supply.
- 2.22 As per my original Proof of Evidence the assessment of deliverable supply from sites identified in the Partial Review is not relevant to the Council's case for the requirement against which supply should be assessed. I do not therefore consider it necessary to address in detail the Council's evidence for these sites. For completeness I reiterate that points identified in my original Proof of Evidence relating to the assessment of deliverability for sites allocated within the Partial Review Local Plan remain valid related to topics such as infrastructure delivery and planning for large-scale development (see particularly Section 5(e)).

d) The Calculation of Local Housing Need Using the Standard Method

- 2.23 I confirm that there has been no change to national planning practice guidance since submission of my original Proof of Evidence relating to the calculation of local housing need. My evidence is therefore unchanged in respect of inputs for the ‘current year’ that should be applied to calculation of the standard method².
- 2.24 It is only the ten-year trend in projections at ‘step 1’ of the standard method calculation that requires updating to reflect the current inputs for the purposes of this Appeal.
- 2.25 Full details of the calculation of a local housing need of 703 dwellings per annum will be provided within the Topic SoCG currently under preparation but are summarised in Table 1 for completeness.

Table 1. Calculation of LHN for Cherwell District Applicable to this Appeal

Requirement	
Households 2024 – 2034 (2014 based)	5,216
Average annual household growth (2024-2034)	521.6
Ratio of median house price to median gross annual workplace-based earnings (2022)	9.55
Adjustment factor	1.346875
Annual Local Housing Need (2014 based) (rounded)	703

² I note that on behalf of the Appellant Section 6 of Mr Pycroft’s original Proof of Evidence provides extensive material disputing this application of the PPG. I also highlight that Mr Pycroft acted on behalf of the Appellant for the Milcombe Appeal (CD/M.59), presenting material consistent with his evidence for LHN within this case. Paragraph 30 of the Decision Letter confirms use of the ‘current year’ for the calculation of LHN, consistent with my evidence.

e) Published Assessment of Supply Versus Requirement – Local Housing Need for Cherwell District

- 2.26 Paragraph 41 of the HLSS and the table that follows detail the assessment of supply versus the requirement for Cherwell District excluding provision for need and supply addressed within the Partial Review.
- 2.27 I have replicated these details in my Table 2 below. For completeness I have illustrated the breakdown of forecast supply by location (Paragraphs 33-38 refer).
- 2.28 I have included a separate column reflecting the provisions of the revised NPPF(Dec)2023 where no buffer is to be applied to the requirement against which supply is to be assessed together with showing the current calculation of Local Housing Need of 703 dwellings per annum.

Table 2. Supply versus Requirement (Cherwell District LHN)

			Five Year Period 2023/24-27/28 (current period)	
	Step	Description	LHN 2024 + NPPF(Dec)2023 Buffer Changes	Published HLSS (AMR 2023)
Five-Year Requirement	a	Standard Method Requirement (2023/24-2027/28)	3515	3550
	b	Annual Requirement (a / 5)	703	710
	c	Requirement Over 5 Years (b x years)	3515	3550
	d	5 Year Requirement plus 5% buffer (c + 5%)	N/A	3728
	e	Revised Annual Requirement over next 5 years (d / 5)	703	746
Components of Supply	(i)	<i>Banbury Supply</i>	1483	1483
	(ii)	<i>Bicester Supply</i>	801	801
	(iii)	<i>Other Areas</i>	1587	1587
	(iv)	<i>Windfall</i>	250	250
	f	Deliverable Supply over next 5 Years	4121	4121
Five Year Supply	g	Total years supply over next 5 years (f/ e)	5.86	5.53
	h	'Shortfall' / Surplus(f – d)	+571	+393

f) Published Assessment of Supply Versus Requirement – Partial Review (Oxford’s Unmet Needs)

2.29 While it is not relevant to the Council’s case for the requirement against which supply should be assessed I set out below the contents of the published HLSS in relation to the separate monitoring of supply against strategic policy PR12a of the Partial Review.

Table 3. Supply versus Requirement (Oxford’s Unmet Needs following Partial Review)

Step	Description	Five Year Period 2023/24-27/28 (current period)	NPPF(Dec)2023 Buffer Changes
a	Partial Review requirement 2021/22-2025/26	1,700	1,700
b	2021/22-2025/26 Annual Requirement (a / 5)	340	340
c	Partial Review requirement 2026/27-2030/31	2,700	2,700
d	2021/22-2025/26 Annual Requirement (c / 5)	540	540
e	Requirement to date (b x years)	680	680
f	Completions 2021/22-2022/23	0	0
g	Shortfall at 31/3/23 (f - e)	680	680
h	Base requirement over next 5 years ((b x 3) + (d x 2))	2,100	2,100
i	Base requirement over next 5 years + shortfall (g + h)	2,780	2,780
j	Base requirement + shortfall over next 5 years plus 5% buffer (i x 1.05)	2,919	N/A
k	Revised Annual Requirement over next 5 years (d / 5)	584	556
l	Deliverable Supply over next 5 Years	80	80
m	Total years supply over next 5 years (l / k)	0.137	0.143
n	‘Shortfall’ (l - j)	-2,839	-2,700

3.0 IMPLICATIONS OF THE REVISED NPPF (DECEMBER) 2023 INCLUDING THE EXTENT OF DELIVERABLE SUPPLY WHICH IS TO BE DEMONSTRATED

a) Introduction

- 3.1 In the course of the preparation of evidence for this Appeal, subsequent to the submission of the Appellant's Statement of Case and publication of the Council's December 2023 AMR, changes to national planning policy have arisen from the most recent version of the National Planning Policy Framework was published in December 2023 (19 December amended 20 December) ('NPPF(Dec)2023').
- 3.2 I summarise the implications of these changes within this section of my Proof of Evidence.
- 3.3 The revisions were published following the Levelling-up and Regeneration Bill: reforms to national planning policy consultation (December 2022) alongside a Government response to the consultation document. Chapter 3 (Providing certainty through local and neighbourhood plans) and Chapter 4 ('planning for housing') both contained consultation proposals relevant to reforming the assessment of housing land supply. The revisions to the NPPF largely correspond to parts of the proposals identified previously.
- 3.4 The specific provisions within the NPPF(Dec)2023 related to the assessment of housing land supply are as set out in the chapter 'Maintaining supply and delivery' at paragraphs 75 to 81.
- 3.5 The NPPF(Dec)2023 is to be read as a whole but it is nevertheless the case that for the purposes of decision-taking where it is necessary to identify and update annually a supply of specific deliverable sites how this is to be measured is addressed specifically within the provisions of paragraph 77. Where relevant, it is the outcomes of the exercise undertaken in accordance with NPPF(Dec)2023 that determines where the consequences at footnote 8 to paragraph 11 are engaged.

b) Summary of the Elements of National Policy That Inform the Assessment of Housing Land Supply

- 3.6 Whether sufficient supply can be demonstrated for the purposes of the requirement against which this is to be assessed for a given application to determine whether the consequences of footnote 8 are engaged can be summarised down to three relevant elements.
1. The **extent of deliverable supply which is to be demonstrated** in accordance with national policy
 2. The **requirement against which supply is to be assessed**
 3. The **period over which forecast delivery is to be considered** to inform the assessment of deliverable supply
- 3.7 With reference to the revised NPPF(Dec)2023 the relevance of the changes to national policy affecting each element can be summarised as follows:
- Differences in the extent of deliverable supply which is to be provided (a minimum supply of five years or four years dependent on the provisions in paragraph 226) is a **new element** arising from the changes to national planning policy. Sufficient provision for a minimum of five years' supply was previously applicable in all instances.
 - In terms of the requirement against which supply is to be assessed the NPPF(Dec)2023 represents **no change** to the provisions of the previous wording of the Framework with the exception of clarifying where no buffer is to be applied. The NPPF(Dec)2023 retains two limbs. The first limb requires the identification of the housing requirement in adopted strategic policies (plural). The second limb is engaged where relevant strategic policies are more than five years old and have not been reviewed and found not to require updating and thus local housing need applies. The

wording of footnote 42 to the NPPF(Dec)2023 is identical to the previous footnote 39 in this respect.

- There are **no provisions** within the revised NPPF(Dec)2023 that are intended to result in forecast delivery being assessed across less than a five year period, even where the provisions of paragraph 226 and a requirement to demonstrate a minimum four years' worth of housing applies. Neither paragraph 77 nor 226 contain any references to distinguish between these circumstances in terms of the period that should be considered. There have been no changes to the definition of 'deliverable', the purposes of which is to identify sites for housing with a "*realistic prospect that housing will be delivered on the site within five years*" (**Council emphasis**).

Subsequent changes to planning practice guidance have confirmed that whether the extent of supply to be demonstrated is to be measured against four or five years' worth of provision this is to be assessed against the position of deliverable housing sites demonstrated against the five-year requirement (PPG ID: 68-055-20240205)³.

3.8 I set out my position on the implications of the new element introduced through changes to national policy with respect to the **extent of deliverable supply to be demonstrated** in the remainder of this section.

3.9 In Section 4 I provide further details for why the changes to national policy have no effect on the requirement against which supply is to be assessed apart from removing the application of a buffer.

c) My Position on the Extent of Deliverable Supply to Be Demonstrated

3.10 The NPPF(Dec)2023 introduces changes to the requirement to assess the extent of deliverable supply in national policy that differ from the language of paragraph 74 of the previous version of the Framework. The effect of these changes is determined by the specific circumstances of a case concerning *inter alia* individual applications and individual local planning authorities together with the imposition of transitional arrangements.

3.11 The provisions of paragraph 76 of the NPPF(Dec)2023 are not engaged. Transitional arrangements determining this are provided via references in footnotes 40 and 79 of the NPPF(Dec)2023 specifying that these provisions of paragraph 76 should only be taken into account as a material consideration from the date of publication when dealing with applications made on or after the date of publication of this version of the Framework.

3.12 The transitional arrangements do not require any assessment of the criteria under parts (a) or (b) of paragraph 76 of the NPPF(Dec)2023 prior to being engaged.

3.13 The requirement to assess the extent of deliverable supply against a figure of either four years or five years against the requirement against which supply should be assessed is determined by the provisions at NPPF2023 paragraph 77 for the purposes of this Appeal.

3.14 The provisions of NPPF(Dec)2023 paragraph 77 apply from the date of publication of the revised Framework in accordance with the transitional arrangements in NPPF2023 paragraph 226.

3.15 In respect of the provisions within paragraph 226 of the NPPF(Dec) 2023, the following circumstances apply to this Appeal:

- The relevant policy approach under NPPF(Dec)2023 to demonstrate a minimum four

³ I note that the interpretation of the period over which supply should be assessed has been contested in cases elsewhere in the district (for example Heyford Park – see CD/N.5 with regards legal Advice on behalf of the Appellant) but this pre-dates clarification provided by revisions to the Planning Practice Guidance.

years' worth of housing supply as specified in paragraph 77 applies from the date of publication of the revised Framework to those authorities which have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need.

- The Cherwell Local Plan Review 2040 – Regulation 18 Consultation Draft (CD/3.3) was published for consultation between 22 September 2023 and 3 November 2023 and:
 - The Regulation 18 Consultation Draft identifies proposed allocations towards meeting housing need (specified as a draft requirement in emerging Core Policy 34) as summarised in Table 7 and addressed in relevant emerging potential policies in area strategies that follow⁴.
 - Indicative Site Maps for the sites identified in emerging Core Policies 25 and 34 are provided in Appendix 2. Appendix 1 (retained policies list) also indicates where the proposals in Appendix 2 will replace those illustrated within the current development plan and thus policies map.
 - While separate to the illustration of sites proposed towards meeting identified needs in Core Policy 34 under Appendix 2 appendices 4 to 11 of the Consultation Draft also indicate visually proposed policies relevant to managing land use.

3.16 These contents of the Consultation Draft constitute relevant material for the purposes of the requirement for the inclusion of a policies map and relevant material for the purposes of a Local Plan under preparation (prior to its submission) fall for consideration under regulation 5(a) of The Town and Country Planning (Local Planning) (England) Regulations 2012 and any accompanying maps as specified in regulation 5(b).

3.17 In this respect it is necessary to reiterate that the provisions of paragraph 226 of the revised NPPF(Dec)2023 apply from the date of publication and therefore apply to plans under preparation prior to its publication date of 19 December 2023. Any local planning authority preparing a draft Plan for Regulation 18 purposes prior to December 2023 has by definition undertaken work that precedes the legislative definitions for either a *submission* policies map or *adopted* policies map that apply at later stages on plan-making.

3.18 It represents a contrived and arbitrary application of the language in paragraph 226 to suggest that the previous choices of authorities in terms of the terminology adopted and presentation of plan-making proposals should preclude the application of its provisions. The absence of a singular policies map at Regulation 18 stage, when there was no pre-19 December 2023 requirement for its preparation, should not be taken to suggest insufficient progress to indicate that the extent of deliverable supply should be measured at four years.

3.19 For the purposes of identifying proposed allocations towards housing need it is not a measure of plan-making progress to ensure these are set out within one composite map for the authority's area. Just as this is not a requirement under the relevant legislation it would not necessarily denote any particular prospect of faster progress with future stages of plan-making within the language of paragraph 226 of the NPPF(Dec)2023.

3.20 The material presented within the relevant draft Plan in Cherwell, setting out the proposed boundaries of individual allocations, provides sufficient clarity in relation to the Plan's proposals and suggested relationship with other relevant proposed and existing designations. In this respect the details shown for individual draft allocation boundaries at Regulation 18 stage need not necessarily be substantially different to the individual

⁴ Banbury Area Strategy emerging Core Policy 62; Biester Area Strategy emerging Core Policy 70; Kidlington Area Strategy emerging Core Policy 76; Heyford Park Strategy emerging Core Policy 82

amendments to the illustration of proposals provided by the submission policies map that can permissively be consulted upon as part of Main Modifications at the Examination stage.

- 3.21 In other words, it is not necessary to consult on the policies map as a single document in all cases. In the case of a draft Plan at Regulation 18 stage individual plans can provide more accessible and relevant information.
- 3.22 The boundaries proposed are dependent on the specific nature of the draft allocations identified. Within the draft Plan for Cherwell these are distinct from, for example, 'broad locations' for future development. The Council has also sought to show where the proposed boundaries would result in the changes to the policies map in the adopted development plan for existing allocations. Principally the draft allocations identified require proposed boundaries to be clearly indicated because they are distinct from simply amending the capacity of existing sites (which may thus not need to be illustrated as part of Regulation 18 draft proposals).
- 3.23 I would also add that neither the language within draft policy proposals nor the generic definition of a Policies Map provided within the glossary of the Regulation 18 consultation draft (CD/J.14) indicate a deficiency or omission from the process with respect to paragraph 226. The draft Plan contains appendices which it clearly appears form part of the intent to accompany the submission and ultimately adopted Plan. This would provide, for example, more detail on elements of the Plan such as Green and Blue Infrastructure and Local Green Spaces.
- 3.24 Where draft policy text (and glossary) refers to the 'Adopted Policies Map' this cannot by definition be judged as part of the contents of a Regulation 18 draft Plan. Equally, it cannot be the case that the relevance of 'appendices' referred to in the policy text will automatically fall away following adoption if they form part of the adopted Plan. The definition within the glossary, albeit generic, refers to 'Maps' in the plural to indicate that reference to more than one source of material may be beneficial. The consultation draft Plan provides a clear indication of this through how its material is presented. This would not preclude the information being readily incorporated into the requisite submission and adopted policies map at future plan-making stages.
- 3.25 For the purposes of this Appeal the requirements of NPPF(Dec)2023 paragraph 226 are thus satisfied and that the extent of deliverable supply should be assessed against a minimum provision **of four years**.
- 3.26 I note that my evidence on this matter is consistent with the Legal Opinion provided to the Council by Douglas Edwards KC (see CD/N.6 – see particularly paragraphs 4 to 6). I note that Mr Edwards KC's Opinion confirms consideration has been given to Sarah Reid KC and Constanze Bell's Advice dated 11 January 2024 (CD/N.5) comprising part of material for the Heyford Park Inquiry. Mr Edwards KC's Opinion is consistent with the flexibility that is required in interpreting the form of any "policies map" that may be included at Regulation 18 stage and separately, for the purposes of NPPF(Dec)2023 paragraph 226, identifies that the proviso for inclusion of a policies map does not attach prior to the Regulation 19 stage.
- 3.27 Under the language of NPPF(Dec)2023 footnote 80 this means that where the extent of deliverable supply is assessed against a minimum 4 years' worth of housing the standard method must be used where relevant strategic policies are more than five years old (consistent with the wording of NPPF(Dec)2023 footnote 42 and with no reference to any provision for unmet needs from neighbouring authorities).
- 3.28 I note that the Advice on behalf of the LPA has been subject to a response in further Advice from Sarah Reid KC (CD/N.7) that continues to dispute both the requirement to demonstrate a policies map at Regulation 18 stage (for the purposes of paragraph 226) and adopts a

prescriptive approach in terms the requirement for its contents. Should it be accepted by the Inspector for this case I note that any formal reply be prepared in response to the latest Advice in CD/N.7 it may therefore be relevant to determination the matter in this Appeal.

4.0 THE HOUSING REQUIREMENT AGAINST WHICH SUPPLY IS ASSESSED

4.1 This section corresponds to Section 5 of my Main Proof of Evidence and is principally unchanged. References to paragraph 77 and footnote 42 of the NPPF(Dec)2023 should be applied accordingly. This supplementary material should also be read alongside my November 2023 Rebuttal Proof of Evidence. I additionally observe as follows:

a) The Finding of Other Appeal Decisions in Cherwell District Addressing the Relevant Requirement to Assessment Supply

4.2 Since the original exchange of evidence for this case there are two Decision Letters that have subsequently been issued for the Appeals at Hempton and Milcombe (PINS Refs 3324704 and 3325113) (CD/M.60 and CD/M.59) where conclusions have been reached on the requirement against which supply is to be assessed as a substantive matter in determination of the Appeal.

4.3 In both these Decision Letters the case for the requirement against which supply is to be assessed has been resolved in favour of the Council and reflects the position put forward in my Proof of Evidence for this Inquiry. With reference to the most recent Decision Letter in Milcombe (CD/M.59), which is consistent with the Hempton Decision Letter released several days earlier, I draw attention to the following conclusions to be considered alongside my evidence for this Inquiry:

- The Inspector was provided a Topic SoCG on requirement and supply that followed the format proposed by the LPA for this Inquiry
- Evidence was prepared and heard against the requirements of the NPPF (September 2023 version) as it was in force until 19th December 2023
- The DL (para.25) deals with the adopted development plan, and (para.26) summarises the parties' respective positions on the requirement. DL (para.27) specifies the age of adopted strategic policies under the language of NPPF Sept. 2023 paragraph 74;
- DL (para.27) confirms that local housing need applies for the purposes of the requirement to assess supply. DL (paras.28 and 29) have regard to national policy, the outcomes and adopted strategic policies of the Partial Review and the relevance of emerging policy in support of the Council's case that contributions towards meeting part of Oxford's unmet needs do not form part of the requirement to assess supply in respect to Milcombe⁵;
- DL (para.30) confirms use of the 'current year' for the calculation of LHN and DL (para.31) confirms that the HDT has exceeded delivery expectations over the past 3 years and the HDT is therefore passed.

b) The Relevance of Changes to National Planning Policy in the December 2023 NPPF to the Requirement Against Which Supply Is To Be Assessed

4.4 In relation to plan-making, including previous outcomes under the Duty to Cooperate, the provisions of the revised NPPF(Dec)2023 do not reflect any fundamental change in approach for how strategic policies may be prepared and have no bearing whatsoever upon the application of existing adopted strategic policies that are less than five years old for the purposes of assessing housing land supply. The outcome of adopted policies is distinct from

⁵ I note that this remains the principal matter in dispute between the parties in this case and further note that the Inspector's conclusions on this point follow consideration of Mr Pycroft's submissions on this point based on his appearance at the Hearing that closely correspond to his original Proof of Evidence for this Appeal (particularly Section 7)

the plan-making process, which may continue to be approached in different ways.

- 4.5 Throughout the recent series of Appeals in the district I have consistently argued that any contention for a fundamental change in circumstances between the earlier NPPF2012 and the previous version of the NPPF2023 in terms of plan-making is incorrect. In terms of the outcomes of plan-making and the application of the housing requirement in adopted strategic policies (and use of local housing need, where it applies) there has been no change in circumstances in either the most recent NPPF(Dec)2023 or previous versions that supports the Appellant's case for use of a single 'hybrid' figure for the housing requirement combining both the local housing need for Cherwell and the specified contribution towards meeting Oxford's unmet needs in the Partial Review.
- 4.6 A comprehensive reading of the revised NPPF(Dec)2023 further reinforces support for the Council's case on the requirement against which supply is to be assessed. Paragraph 17 of the revised NPPF(Dec)2023 is unchanged. Paragraph 25 continues to deal with effective cooperation stating "strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans" – noting the reference to 'Plans' in the plural.
- 4.7 The provisions at paragraphs 61 to 68 of the NPPF(Dec)2023 relate to plan-making, which remains distinct from the assessment of housing land supply for the purposes of decision-taking.
- 4.8 Within these paragraphs one change can be identified in paragraph 67 that specifies where the overall requirement "*may be higher than the identified housing need, if for example, it includes provision for neighbouring areas*".
- 4.9 The additional wording incorporated into national policy in the NPPF(Dec)2023, relating to plan-making, is in effect only a reflection of existing Planning Practice Guidance at 2a-010-20201216 for circumstances where housing need may exceed the result of the standard method. The does not in itself provide indicate a requirement to use a single 'hybrid' figure to assess supply in a case such as this.
- 4.10 Paragraph 67 goes on to state "*Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations*"
- 4.11 If, having regard to this paragraph, the use of a single 'hybrid' figure to assess supply were necessary, it would mean that, despite the carefully considered spatial strategy within the Partial Review to make specific provision for part of Oxford's unmet needs in the most sustainable locations, national policy would dictate that instead the overall requirement (including unmet needs) would be redistributed as part of considering housing requirements for designated neighbourhood areas.
- 4.12 This is patently not the case and, having regard to 'the overall strategy for the pattern and scale of development and any relevant allocations' as specific in paragraph 67, it is the separate adopted strategic policies of the Partial Review to treat the requirement for part of Oxford's unmet needs separately that ensure that need and supply are not conflated.
- 4.13 Within the relevant 'Maintaining Supply and Delivery' section it is the case that the combined changes between paragraphs 75 and 77 support the Council's case that regard may need to be had to more than one strategic policy and more than one adopted Local Plan. This is consistent with the contents of the PPG, particularly PPG ID: 68-006-20190722.
- 4.14 Paragraph 75 contains a new provision for monitoring, irrespective of the assessment of five year supply, stating that 'Local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies (plural)'.

This is additional to the references to adopted strategic policies (plural) that is retained in paragraph 77 (formerly paragraph 74) relating to five year supply. This is also consistent with housing requirements being contained in and having regard to more than one policy.

- 4.15 It is also relevant that the language of paragraph 76 is specific to ‘**Local Plan**’. Therefore, it is different to **the requirement in adopted strategic policies**. This indicates an intention on the Government’s part to expressly limit the provisions to plans less than five years old. The Government cannot ensure that the NPPF covers all circumstances, and nowhere does it say policies cannot be contained in more than one plan.
- 4.16 The sensible interpretation of para 76(a) is that it applies **only to/where the local plan that contains the relevant strategic policies is less than five years old**. This plainly makes sense because these provisions cannot be engaged where the local plan is more than five years old (thus an incentive to adopting plans), which is different to assessing the requirements against which supply should be assessed for the purposes of NPPF(Dec)2023. This includes where adopted strategic policies may continue to be applied where these have been reviewed and found not to require updating (for paragraph 77 purposes). If the Government thought that should also engage paragraph 76 it would surely have said so.
- 4.17 In these circumstances, irrespective of the separate adopted strategic policies of the Cherwell Local Plan Part 1 Partial Review being less than five years old, paragraph 76 would not apply so as to remove the requirement to demonstrate a housing land supply in Cherwell excluding the Partial Review sites.
- 4.18 This provides consistency to prevent the conflation of need and supply under the Council’s case that supply from this sites is not counted towards the requirement against which supply is to be assessed based on local housing need.
- 4.19 The Council’s case therefore falls squarely under NPPF(Dec)2023 for the purposes of this Appeal and therefore footnotes 42 (and 80) to use the standard method apply exactly as they did in the previous version. The Council’s case for the requirement against which supply is to be assessed is therefore unchanged.
- 4.20 To summarise in relation to any implications for the requirement against which supply is to be assessed the provisions of NPPF(Dec)2023 paragraph 77 apply from the date of publication of the revised Framework subject to the transitional arrangements at NPPF2023 paragraph 226.
- 4.21 In respect of the provisions within the language of the NPPF(Dec)2023 paragraph 77 (and associated footnotes) applicable for determination of the appeal in terms of the requirement against which supply is to be assessed this means that:
- There has not been a significant under delivery of housing and no buffer applies to assessing the extent of deliverable supply against the requirement against which supply should be assessed. This is determined by the result of the Housing Delivery Test exceeding 85%
 - Under the language of NPPF(Dec)2023 footnote 42 the standard method is to be used to calculate the requirement against which supply is assessed when local housing need applies (and policies are more than five years old and have not been reviewed and found not to require updating)
 - Where the strategic policies setting out the relevant housing requirement are more than five years old (and thus paragraph 76 does not apply) the provision set in footnote 42 to paragraph 77 in terms of the requirement against which supply should be assessed must be considered irrespective of the application of policy in paragraph 226. Local housing need therefore applies in terms of the requirement against which supply is to be assessed, whether for a minimum provision of four years’ or five years’ supply.

5.0 HOUSING DELIVERY TEST AND THE APPROPRIATE BUFFER

5.1 This section addresses Section 6 and Appendix 1 of my original Proof of Evidence. I confirm that there has been no material change to the methodology for calculation of the Housing Delivery Test (HDT) relevant to my evidence for the requirement against which supply is to be assessed (see CD/H.8).

a) The Housing Delivery Test 2022 – Result for Cherwell District Council

5.2 The official 2022 Housing Delivery Test (19th December 2023) confirms no buffer is to be applied as the Council delivered 143% of the number of homes required as calculated during the HDT (see CD/H.7).

Table 4. Housing Delivery Test Result

Annual Requirement	Cherwell District	
	2019/20 Requirement	881
	2020/21 Requirement	650
	2021/22 Requirement	934
	Total	2464
Recorded Completions		
	2019/20 Completions	1159
	2020/21 Completions	1192
	2021/22 Completions	1175
	Total	3526
Housing Delivery Test Result		143%

b) Implications of the Housing Delivery Test for the Appellant’s Case

- 5.3 The Housing Delivery Test deals with delivery. It is agreed that the HDT is passed.
- 5.4 The relevant HDT Result of 143% is calculated on a single authority basis for Cherwell District. No buffer is to be applied in accordance with the provisions of the NPPF(Dec)2023.
- 5.5 The reasons from my original Proof of Evidence continue to apply to demonstrate that the HDT cannot determine the approach to calculating the housing requirement and housing land supply, which is a separate subject⁶.
- 5.6 While I have not sought to prepare a full update to Appendix 1 of my original Proof of Evidence I have revised Tables 1 – 3 of that document (see Tables 5 to 7 below) to illustrate that the HDT calculation for the number of homes required remains fundamentally different to the Appellant’s case for the requirement against which housing land supply should be assessed in this Appeal.

⁶ I note that on behalf of the Appellant Mr Pycroft’s original Proof of Evidence argues that the calculation of the HDT is relevant to the requirement against which HLS should be assessed (see 7.54 – 7.58). Mr Pycroft acted on behalf of the Appellant for the Milcombe Appeal (CD/M.59) and also argued for the relevance of the HDT in that case. Paragraph 31 of the Decision Letter confirms the HDT is passed and does not indicate any relevance to the assessment of HLS.

Table 5. 2022 HDT Number of Homes Required – Cherwell District

	Household		Difference	Local Housing Need	Net Unmet Needs Adjustment	Number of Homes Required ^[1]
	Projections		/10			
	2019	2029				
2019/20	61533	66997	546.4	742	220	881
	2020	2030				
2020/21	62135	67526	539.1	756	220	650
	2021	2031				
2021/22	62698	68063	536.5	714	220	934

Table 6. 2022 HDT Number of Homes Required – Vale of White Horse District

	Household		Difference	Local Housing Need	Net Unmet Needs Adjustment	Number of Homes Required ^[1]
	Projections		/10			
	2019	2029				
2019/20	54104	59073	496.9	679	110	722
	2020	2030				
2020/21	54642	59545	490.3	661	110	513
	2021	2031				
2021/22	55157	60016	485.9	636	110	746

Table 7. 2022 HDT Number of Homes Required – Oxford City Council

	Household		Difference	Local Housing Need	Net Unmet Needs Adjustment	Number of Homes Required ^[1]
	Projections		/10			
	2019	2029				
2019/20	61129	66477	534.8	749	-715	30
	2020	2030				
2020/21	61621	67046	542.5	760	-715	30
	2021	2031				
2021/22	62094	67649	555.5	762 ⁷	-715	47

⁷ Based on 40% cap applied to annual adopted requirement in strategic policies of 544dpa

6.0 ASSESSMENT OF DISPUTED SUPPLY FROM SPECIFIC DELIVERABLE SITES

a) Introduction

- 6.1 This section updates Section 7 of my original Proof of Evidence. My evidence for the approach to assessing deliverable supply in accordance with national policy is unchanged and should continue to be read alongside my original Proof.
- 6.2 At the time of writing, I have outlined information relevant to supporting the Council's assessment of deliverability only upon those sites that I understand may be disputes as part of the draft Topic SoCG.

b) Observations Regarding the Council's Most Recent Assessment of Supply

- 6.3 For the avoidance of doubt, I confirm that my instructions did not extend to contributing to or preparing the contents of the December 2023 AMR and I had no sight of the document prior to its publication. All previous Appeal Decision Letters since my involvement as expert housing land supply and requirement witness on behalf of the Council considered the assessment of deliverable supply against a base date of 1st April 2022.
- 6.4 My input to the Council's evidence amounted to provision of general advice as a 'critical reviewer'. This related to non-specific advice on how the Council might seek to collect clear evidence of a realistic prospect for completions beginning within five years from relevant sites and how the Council might exercise its judgement on the assessment of deliverability corresponding to the (non-exhaustive) requirements of national policy and guidance.
- 6.5 I did not, therefore, personally provide the Council's conclusion on deliverability or forecast of supply from any individual site as contained within the AMR and Updated HLSS at Appendix 1.
- 6.6 I set out the following observations to provide my view on the Council's most recent AMR (CD/K.11) where it is relevant to clarifying the dispute between the parties regarding the assessment of deliverability and forecast of supply from specific sites. This is relevant to confirming where my professional opinion supports the Council's assessment.
- 6.7 The Updated Assessment provides a base date of 1 April 2023 and covers the five year period 1 April 2023 to 31 March 2028. Appendix 1 of the AMR should not be read in isolation. I note that 'Theme 2: Building Sustainable Communities' within the main AMR document references and provides a summary of the Updated Assessment and provides relevant information relating to housing delivery at Paragraphs 4.27 – 4.34 and tables therein.
- 6.8 Paragraphs 4.121 - 4.127 and the tables therein also provide reporting against indicators for Policies Villages 1 and Villages 2. This includes an assessment of housing completions and outstanding planning commitments within certain settlements and thus provides relevant information relating to housing delivery.

i) Local Evidence for Housing Delivery – First Years' Forecast Completions and Indicators of New Supply

- 6.9 The Council has a recent track record of making conservative forecasts for the first year of completions within the five year period.
- 6.10 There are no sites where I have sought to increase the Council's forecast of deliverable supply. It does not automatically follow, however, that there will not be sites where the Council's forecast is exceeded for example by reason of an earlier date for first completion or faster build-out. This has been the recent experience of the Council particularly in the first year of forecast completions.
- 6.11 This is shown in Table 8 by comparing forecasts from the respective Housing Delivery

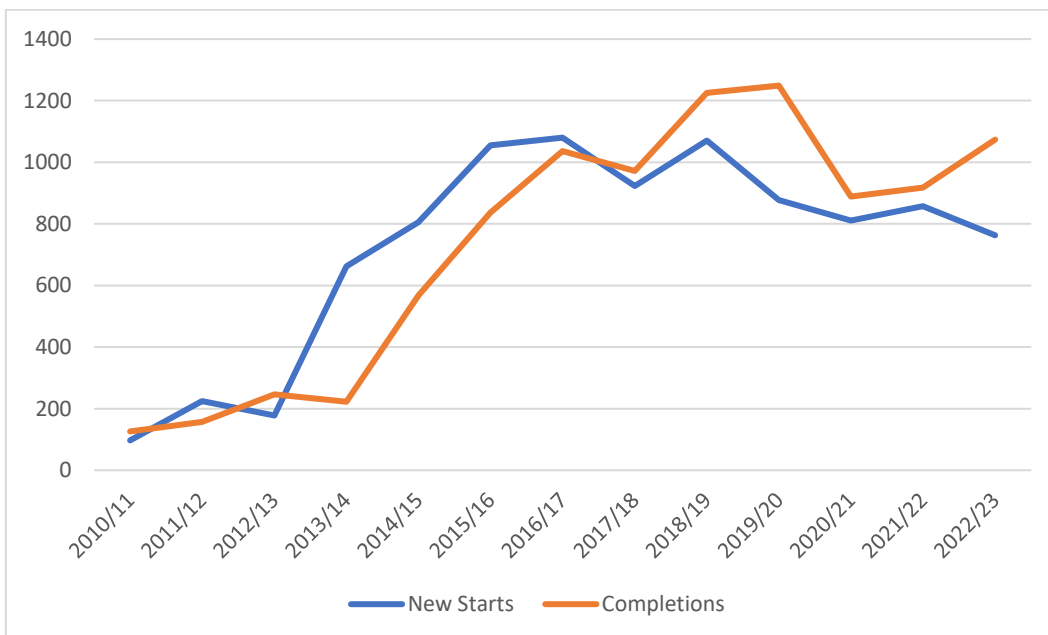
Monitors for first years' completions since 2020/21 against actual recorded completions for those years. The first years' forecast has been exceeded in each of the respective first year comparisons. The previous HLSS forecast 1,023 completions in the last monitoring years and this has been exceeded by 29% (1,318 dwellings). Relative to the figure for Local Housing Need at the base-date of the previous assessment (742dpa) actual completions exceeded the minimum annual five year requirement (inclusive of 5% buffer) by around 69%.

Table 8. Comparison Between First Years' Forecast and Actual Completions

	2020/21	2021/22	2022/23	2023/24	2024/25
200 AMR	933	1177	1432	1500	1536
2021 AMR		1118	1337	1338	1258
2022 HLSR			1023	919	804
Actual Completions	1192	1188	1318		
December 2023 AMR Forecast				853	761
Exceeded HDM Prediction (%)	28%	6%	29%		

6.12 I have reviewed the relevant national statistics for further indicators of new supply based on quarterly and annual Financial Year totals for new dwellings started and under construction. These indicate no pronounced reduction in activity for the most recent five quarters (covering the 2022/23 Financial Year and Q2 April-July 2023). The Financial Year totals are shown in Figure 1 and Table 9 below. New starts show a -11% reduction since 2021/22 but are broadly consistent with recent trends.

Figure 1. Indicators of New Supply – Starts and Completions by Financial Year



Source:

<https://app.powerbi.com/view?r=eyJrIjoiazZjg4NW11MjMtZTRkNC00MG4LWFkZTI0MjI0ODc4YWEwOTdhliwidCI6ImZmMzQ2ODEwLTljN2QtNDNkZS1hODcyLTl0YTJIZjM5OTVhOCJ9>

Table 9. Indicators of New Supply - Starts and Completions

Financial Year	New Starts	Completions
2010/11	97	126
2011/12	225	157
2012/13	178	246
2013/14	662	222
2014/15	805	568
2015/16	1055	837
2016/17	1080	1036
2017/18	923	972
2018/19	1071	1225
2019/20	877	1249
2020/21	811	889
2021/22	857	918
2022/23	763	1074

Source:

<https://app.powerbi.com/view?r=eyJrIjoizjg4NWl1MjMtZTRkNC00MGM4LWFkZTI0MjdlODc4YWwOTdhliwidCI6ImJmMzQ2ODEwLTljN2QtNDNkZS1hODcyLTl0YTJIZjM5OTVhOCJ9>

- 6.13 First quarter data for the 2023/24 financial year actually shows a substantial quarterly increase in activity relative to the same position in the 2022/23 year (+111%). 257 completions have already been recorded as part of Building Control statistics (equivalent to 30% of the Council’s forecast 853 unit total; and corresponding to a modest -18% lower volume of recorded completions for this quarter in 2022/23. Official statistics support my view that development activity in the market remains fairly consistent and the Council’s approach to forecasting first year completions remains relatively conservative.
- 6.14 In term of other indicators of housing supply it is worth noting that Cherwell is ranked 17th amongst all local authorities in England for net additional dwellings per 1,000 units of existing stock, based on completions in 2022/23 (c.19 additions per 1,000 units).

Table 10. Indicators of New Supply – Apr-Jun Quarter 2 Series

	New Starts	Completions
Q2 2019/20	215	377
Q2 2020/21	64	95
Q2 2021/22	303	213
Q2 2022/23	137	312
Q2 2023/24	289	257
Difference vs Last Q2	111%	-18%

Source:

<https://app.powerbi.com/view?r=eyJrIjoizjg4NWl1MjMtZTRkNC00MGM4LWFkZTI0MjdlODc4YWwOTdhliwidCI6ImJmMzQ2ODEwLTljN2QtNDNkZS1hODcyLTl0YTJIZjM5OTVhOCJ9>

ii) Local Evidence for Housing Delivery – Current Construction Activity

- 6.15 I have also interrogated the Council’s Updated Assessment to understand the details of sites contributing towards the forecast of completions in the first year of the current five-year period 2022/23. The schedule of forecast supply at Appendix 1 (‘Five Year Land Supply Position Statement’) to Appendix 1 of the AMR contains entries for ‘Scheme Status’ at the Base Date. The ‘Under Construction’ category is applied only to sites that have delivered completions in previous years. A separate ‘Granted’ status applies to sites with permission in place but this may correspond to types of consent falling under ‘part a’ or ‘part b’ of the NPPF definition.
- 6.16 For sites with this category where completions are forecast in 2023/24 it is relevant to review the summary of notes on evidence provided by the AMR. Finally, Appendix 1 summarises the position on ‘small sites’ for each of Banbury, Bicester and Other Areas as a single row for each location. The Council’s full schedule of small sites for sites with planning permission includes categories from the monitoring system for these data to show those records ‘started’ at 1 April 2023. Putting these data together, it is possible to identify those categories and sites that comprise the Council’s first year of forecast completions. This is shown in Table 11 below.

Table 11. Summary of Components of 2023/24 Forecast Delivery by Site Status

Component of Supply	2023/24
Small Sites - 'Started'	113
Under Construction	536
Granted ⁸	201
Total - U/C	649
Total - incl Granted	850
Granted - 0 forecast 2023/24	
AMR Notes indicate commencement ⁹	239
Total including sites with commencement	1089

- 6.17 In summary, 536 units of the forecast total are on sites ‘Under Construction’ (around 63% of the total). For these records the Council’s assessment generally relates to all outstanding plots or is consistent with the build out in previous years. 113 forecast units on ‘small sites’ also have a status of ‘Started’ i.e., assumed for this purpose to be under construction at the base date. The Council only includes 201 forecast completions on large sites with ‘Granted’ status with no completions recorded previously. In each case the evidence within the AMR indicates commencement on site and/or marketing of homes for sale.
- 6.18 The categories summarised above equate to 850 forecast completions. The minor difference

⁸ South of Salt Way – East; Former RAF Upper Heyford; Land at Merton Road, Ambrosden; Land North of Hempton Road and West of Wimborn Close, Deddington; Land South and Adj. to Cascade Road, Hook Norton; Land South of Home Farm House, Clifton Road, Deddington; "OS Parcel 9100 Adjoining And East Of Last House Adjoining And North Of Berry Hill Road, Adderbury"; The Ley Community, Sandy Lane, Yarnton

⁹ OS Parcel 9507 South of 26 and adjoining Fewcott Road, Fritwell; OS Parcel 9507 South of 26 and adjoining Fewcott Road, Fritwell; Land West of Southam Road; Bolton Road; North West Bicester Eco- Town Exemplar Project (Mixed-Use Centre)

with the 853 unit total relates to forecasting on small sites as a single row, noting it is evidently the case some dwellings can be started and completed in under 12 months.

- 6.19 From this analysis I have also noted that there are several sites within the Appendix 1 schedule with 'Granted' status and with no completions forecast in 2023/24 but where the evidence summarised indicates some activity on site. Taking these sites only, notwithstanding that the actual completions on sites already forecast in 2023/24 may exceed or fall below the Council's forecast total, there are 239 plots with planning permission where some completions in 2023/24 is entirely possible.
- 6.20 Presenting these data in this way again indicates why the Council's approach to forecasting completions in the first year of the five-year period is likely to be conservative and robust.

iii) Local Evidence for Lead-In and Build-Out Rates

- 6.21 Evidence is available within the AMR that supports the Council's assumptions for lead-in timeframes and subsequent build-out of sites following the submission of planning applications. Table 39 of the AMR contains an annual schedule of completions at Category A Villages. From this I have identified relevant Outline and Reserved Matters submission and determination dates and estimated the date of first completions based on the number of completions recorded in the first year of delivery (for example, 30 completions I have indicated first completions in summer of the monitoring period but under 10 completions I have indicated first completions towards the end of the period). This schedule is provided at Appendix 1 to my Supplementary Proof of Evidence.
- 6.22 This analysis indicates the following lead-in timeframes as shown in Table 12. It is entirely typical for schemes to deliver completions within five years of submission of applications for Outline permission. Average build-out for all years with five or more completions is around 20 dwellings per annum but sensitive to site size and with some schemes recording much greater totals.

Table 12. Lead-in And Build Out Rates for Category A Village Sites (AMR Table 39)

Row Labels	Average of Submission to First Permission Years	Average of First Submission to First Permits Development Years	Average of First Permits Development to First Completions Years	Average of First Submission to First Completions Years	Average of Annual Average
Full	0.9	0.9	1.0	1.9	19.7
Outline	1.3	2.8	1.5	4.3	23.0
Grand Total	1.1	1.9	1.3	3.1	21.1

- 6.23 Finally, in respect of build-out rates I note that the AMR includes at Table 16 an annual schedule of progress and completions on strategic sites. This indicates that strategic sites in Cherwell have regularly delivered substantially in excess of 100 dwellings per annum and that average completions of over 50 dwellings per annum have been achieved by single developers. In 2022/23 over 250 completions were achieved at RAF Upper Heyford and Kingsmere Phase 2.
- 6.24 In Table 13 below I have illustrated a sample of strategic sites from the Council's Updated Assessment. Reflecting progress on other strategic sites this generally indicates a more conservative series of forecasts and in-part corresponds to those remaining strategic sites with a higher proportion of supply falling under 'part (b)' of the NPPF definition at the base-date. The Council's approach is nonetheless consistent with local evidence for the delivery of strategic sites as outlined in its AMR.

Table 13. Forecast Delivery from Strategic Sites in the Updated Assessment

		Projection 23/24	Projection 24/25	Projection 25/26	Projection 26/27	Projection 27/28	5 year supply
Total	Strategic Sites Sample	543	366	346	460	396	2111
Banbury Supply	BANBURY 3 - WEST OF BRETCH HILL	35	0	0	0	0	35
	BANBURY 5 - NORTH OF HANWELL FIELDS	12	0	0	0	0	12
	BANBURY 16 - LAND SOUTH OF SALT WAY AND WEST OF BLOXHAM ROAD	72	0	0	0	0	72
	BANBURY 17 - SOUTH OF SALT WAY	125	101	98	100	100	524
	BANBURY 18 - DRAYTON LODGE FARM	0	50	50	75	75	250
Bicester Supply	BICESTER 1 - NORTH WEST BICESTER	52	16	0	50	50	168
	BICESTER 3 - SOUTH WEST BICESTER PHASE 2	79	5	0	60	0	144
	KINGSMERE (SOUTH WEST BICESTER) - PHASE 1	25	0	0	0	0	25
Other Areas	VILLAGES 5 - FORMER RAF UPPER HEYFORD	143	194	198	175	171	881

iv) The Classification of Deliverable Supply in Accordance with the Definition in National Planning Policy and Relationship with Sites Disputed in this Appeal

- 6.25 This analysis is critical to informing my assessment of the robustness of the Council's assessment of supply. Of 4,121 units forecast in the most recent assessment 1,967 units (48%) comprise sites under part (b) of the definition in national policy. This is relevant to the assessment of deliverability and sites requiring clear evidence of a realistic prospect of completions within five years. The proportion of sites falling under part (b) has increased from the previous assessment of supply at 1 April 2022 (comprising around 27% (1,092 units) of the previous total).
- 6.26 It is relevant, however, to note that within this global total there is a more nuanced understanding of the requirements of clear evidence and the information available to support the Council's assessment at the 1 April 2023 base-date.
- 6.27 I have sought to illustrate that while specific details of disputed sites are unconfirmed in the Topic HLS SoCG for this case the same expert housing land supply witness appointed by the Appellant for this Appeal contested the assessment of 1,183 units' supply from specific deliverable sites compared to the Council's published position in the December 2023 AMR in another case within Cherwell District¹⁰. All contested supply from specific sites was identified to fall under part (b) of the definition. This corresponds to around 60% of the total under 'part (b)' sites.
- 6.28 The total forecast supply falling under 'part (b)' can be summarised across three components:
- Sites falling under 'part b' at the base date and assessed as deliverable in previous iterations of the HLSS but without detailed permission
 - Sites falling under 'part b' at the base date and with detailed (Reserved Matters) permission for part of the forecast total granted since the base-date

¹⁰ Most recently PINS Ref: 3326761 OS Parcel 1570 Adjoining and West of Chilgrove Drive and Adjoining and North of Camp Road, Heyford Park considered on the basis of the Council's position in the December 2023 AMR

- Site falling under ‘part b’ at the base date and not assessed as deliverable in previous iterations of the HLSS.

6.29 Table 14 below illustrates the total under each component, my understanding of the Appellant’s position on deliverable supply from each component and thus the extent of supply in dispute.

Table 14. Components of Supply Falling Under Part B of the NPPF2023 Definition

	AMR Dec 2023	Appellant	Difference
Part B Sites - No Detailed Permission included in previous assessments	330	180	-150
Part B Sites – Detailed or Part-detailed Permission Granted Since 1 April 2023	1187	604	-583
Part B Sites - No Detailed Permission and not included in previous assessments	450	0	-450
Total	1967	784	-1183

- 6.30 While I consider each disputed site separately it is apparent that the Appellant is principally seeking to dispute those sites requiring clear evidence and not included in previous iterations of the assessment. Conversely, a substantial degree of firm progress and availability of clear evidence is by definition accepted on sites falling under other components of the ‘part b’ definition.
- 6.31 All ‘new’ sites not included in previous iterations of the HLSS correspond to Outline (or pending Outline) applications for planning permission with the exception of one record pending full planning permission at Kidlington Grange. For those unallocated sites pending grant of planning permission my position recognises that the part (b) definition in national policy is not a ‘closed list’ albeit this may affect judgement when assessment clear evidence of a realistic prospect.
- 6.32 I note that the Council’s Updated Assessment does not provide a specific breakdown of sites by the NPPF definition of deliverable. However, there is recognition (for example at Paragraphs 34 and 38) that recent evidence indicates sites granted planning permission have a strong track record of building out within five years. This corresponds to the identification of ‘New Sites’ within the forecast supply falling under ‘Part B’ corresponding to those I have identified.
- 6.33 I note, for example, that where local evidence for lead-in timescales is applied to the ‘New Sites’ category the Council’s forecasts compare conservatively with when first completions would be expected reflecting local evidence. This provides relevant information alongside the Council’s assessment and justification for including sites within the forecast supply. This is shown in Table 15 below:

Table 15. Local Evidence for Lead-in Timeframes for ‘New’ Part B Sites

LPA ref:	Address	Submission Date	Forecast First Completions	Expected First Completions - Local Evidence
18/00293/OUT	Canalside Caravan site, Station Road	25/05/2022	2026/27	11/09/2026
19/01047/OUT	Bankside Phase 2	15/07/2021*	2027/28	01/11/2025
21/03426/OUT	Land Opposite Hanwell Fields Recreation, Adj To Dukes Meadow Drive, Banbury	06/10/2021	2026/27	23/01/2026
22/02101/OUT	Land Adjoining Withycombe Farmhouse Stratford Road A422 Drayton	14/07/2022	2027/28	31/10/2026
21/04112/OUT	OS Parcel 2778 Grange Farm North West Of Station Cottage Station Road Launton	08/12/2021	2026/27	27/03/2026
19/02350/OUT	Land at Deerfields Farm Canal Lane Bodicote	23/10/2019	2026/27	09/02/2024
22/01976/OUT	OS Parcel 3489 Adjoining And South West Of B4011, Ambrosden	01/07/2022	2026/27	18/10/2026
21/00500/OUT	Land North Of Railway House, Station Road, Hook Norton	16/02/2021	2026/27	05/06/2025
22/00017/F	Kidlington Garage, 1 Bicester Road, Kidlington	05/01/2022	2025/26	16/12/2023

*Local evidence applied based on Committee Date of Resolution to Grant PP, reflecting longer than usual lead-in timeframes since submission of the Outline application

6.34 It should be stated that the Council has not included all such sites within its assessment of deliverable supply. The Council’s assessment is based on the information available and appears to represent a balanced judgement; see, for example, Paragraph 37 for examples of site at North West Bicester that remain classified as developable rather than deliverable.

c) Small Sites with Planning Permission and Windfall

6.35 Regarding small sites with planning permission I addressed this category at paragraphs 7.42—7.43 of my original Proof of Evidence. As part of publication of the Updated Assessment and sharing of information between the parties a full schedule of small sites with planning permission has been provided by the Council.

6.36 This corresponds to the totals provided in summary rows in the schedule of sites in the Updated Assessment. The schedule confirms that the totals provided by the Council relate to specific deliverable sites with planning permission. Table 16 below illustrates that the total for small sites with permission is marginally lower than the equivalent total at 1 April 2022 and broadly consistent with past trends for this category of sites:

Table 16. Small Sites with Planning Permission 2022 and 2023

	01- Apr-23	01- Apr-22
Banbury	62	99
Bicester	45	34
Other	202	185
Total	309	318

- 6.37 My analysis indicates that the Council’s forecast supply from specific small sites where permission is recorded to have lapsed before the base date. While there are a small number of records where permission *may* have lapsed since the base-date (26 units), or could lapse in the remainder of the 2023/24 monitoring period (27 units), it is not appropriate to exclude these from the forecast total at the base-date. The Council is unlikely to have new, specific information related to these sites regarding whether a commencement has actually occurred since it undertake the most recent site surveys.
- 6.38 In relation to the Council’s proposed windfall allowance I address this at paragraphs 7.44 – 7.45 of my original Proof of Evidence. In its Updated Assessment the Council has increased the windfall allowance from 100 units to 125 units per annum, applied to years 4 and 5 only. The reasons are provide at paragraph 39 of the Land Supply Statement and indicate that past trends for delivery of small sites amounts to 140 units per annum. This is consistent with the observations provided in my Main Proof of Evidence based on previous SHELAAAs. The main body of the December 2023 AMR (Table 17 and paragraph 4.34) informs the finding of the Updated HLSS. The AMR identifies 1,634 completions on windfall sites under 10 dwellings for the period 2011-2023 (a 12-year average of 136 dwellings). This is consistent with the Council’s increased windfall allowance.
- 6.39 I also note that the data shared between the parties in respect of planning permissions on small sites allows calculation of the number of new permissions granted from a given data. This is relevant to assessing the reliability of supply and expected future trends in accordance with NPPF2023 paragraph 71. These data indicate 112 units of outstanding commitments on sites granted after 1 April 2022, which correspond to permissions the Council could not have calculated at the previous 1 April 2022 base-date. While most of these permissions would be expected to be built-out within three years this represents that the Council is consistently granting new permissions for small sites consistent with the proposed windfall allowance.

d) Revisions to the Published Position for Forecast Supply Identified in the HLSS

- 6.40 To narrow the extent of disagreement between the parties and make best use of Inquiry time I provided factual updates on behalf of the Council reflecting my engagement in previous cases. I expect these changes to be agreed during preparation of the Topic SoCG (CD/G.5) and thus provide the following amendments to forecast supply within the published HLSS:
- 50 dwellings should be removed from the Bicester Gateway Site (LPA ref: 20/00293/OUT). This site is not regarded as deliverable subsequent to correspondence from the promoter regarding progressing commercial elements of the mixed-use proposals
 - 33 dwellings should be removed from the entry covered by 20/02345/LDO Local Development Order (Bicester 2) to address units identified in the forecast supply that are not covered by Certificates of Compliance with the LDO (15 units) or separate Reserved Matters permission (22/02312/REM – 93 units) with the LDO itself no longer remaining in force beyond December 2023.
- 6.41 I confirm both the entries relate to capacity at Bicester.
- 6.42 These five entries together result in the removal of 83 dwellings from the published position (4121 – 83 = 4,038 units)

e) Summary of Potentially Disputed Supply from Specific Sites

- 6.43 In Table 18 below I have set out those sites I have identified as being potentially disputed by the Appellant's expert housing land supply witness reflecting the evidence exchanged in recent cases.
- 6.44 I have included only those sites relevant to the Council's case to assess supply against the requirement based upon local housing need for Cherwell District. This excludes the contribution from any supply identified to contribute towards Oxford's unmet needs from the Partial Review Local Plan.
- 6.45 Prior to receipt of any further reasons to contest the Council's assessment I would note that in setting these out the Appellant is required to have regard to the Council's approach to assessing supply in the latest Statement. This includes the commentary provided for each site, together with the overarching context provided within the document.
- 6.46 The Statement references the range of evidence that the Council references as relevant for consideration up to publication of the December 2023 AMR (CD/K.11). Paragraph 37 of the Statement provides an illustration that the Council has generally maintained a conservative assessment to the contribution of supply from sites such as North West Bicester in terms of start dates and build-out rates.
- 6.47 I have highlighted within the previous sub-section that progress since the base-date is relevant to reviewing conclusions on deliverability and the Council's judgement at the previous base date. The Appellant is required also required to take this into account if guidance is to be applied consistently in contesting the Council's position.

Table 17. Potentially Disputed Sites

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
Banbury 1*	Banbury Canalside (Caravan Site)	63	63	0	-63	<p>The AMR states:</p> <p>“Outline permission for 63 dwellings expired in June 2022. A new outline application for 63 dwellings (22/01564/OUT) at Station Road was approved in July 2023 subject to signing of a section 106 agreement. Site is part of a wider allocation in the adopted Cherwell Local Plan and the wider site is proposed to be allocated for mixed use development in the draft Local Plan Review 2040. Projection allows sufficient time (circa 3 years) for reserve matters submission and determination.”</p> <p>Progress with completion of S106 planning obligation relevant to the AMR commentary includes:</p> <ul style="list-style-type: none"> - Chased by agent on behalf of applicant to move drafting of S.106 forward. - A formal extension of time sought and agreed between parties to 5 February 2024. - Lack of resource within Legal Services slowed progress initially. However, the drafting work was outsourced to 3rd party legal firm and Terms of agreement and associated costs have been agreed and is to be based upon previously agreed (but never implemented) permission and associated S.106 agreement. - Confirmation of legal representatives acting for applicant have also been provided.

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>There are no major viability or infrastructure issues affecting the deliverability of this site. It is not reliant on other sites coming forward.</p> <p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions September 2026.</p>
Banbury 4/12*	Land North East of Oxford Road, West of Oxford Canal)	350	50	0	-50	<p>The AMR states:</p> <p>“Planning application for 700 dwellings (17/01408/OUT) was received in June 2017. A new application (19/01047/OUT) for a residential development of up to 825 dwellings was approved subject to legal agreement in July 2021. It is assumed that 2 housebuilders will be on site at a peak of 50 homes per year per developer. The expected delivery rates allow sufficient lead-in time for Outline and Reserved Matters approvals and construction time. Five years from the base date is considered sufficient time for the first dwellings to come forward.”</p> <p>Named Housebuilder(s) Hallam / Henry Boot</p> <p>Progress with completion of S106 planning obligation relevant to the AMR commentary includes:</p> <ul style="list-style-type: none"> • Meeting with LPA and applicant and legal representatives (CD/K.13). August 2023. • Following on from this an updated S.106 agreement has been drafted and is broadly agreed between LPA, OCC and Hallam which includes provision for the relocation of BUFC (CD/K.12 refers). • Correspondence on the matter last provided Nov 2023 whereby a further EoT has been requested to

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>bring matters to a close (informally agreed at meeting in Nov 23 – awaiting written confirmation.</p> <ul style="list-style-type: none"> • Conditions agreed between parties. <p>Promoter engagement? Hallam Land Management</p> <p>Relevant evidence of firm progress with infrastructure delivery to enable development and relationship with surrounding sites :</p> <ul style="list-style-type: none"> • All within same New College Oxford ownership. • Within S.106/S.278 - Provision of new link road between Oxford Road and Bankside/Longford Park by end of 2025. <p>Developer submission (Framptons) received on 30 October 2023 (CD/K.14). It states that the Council's trajectory is unduly pessimistic and should be updated.</p> <p>Their representation to the Local Plan regulation 18 consultation supports the continued allocation of this site which shows their ongoing commitment to the delivery of this site.</p> <p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions November 2025.</p>
Banbury 17 **	South of Salt Way, East	700	400	237	-163	The AMR states:

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>“Outline permission for the 1000 homes is secured. This covers the remaining area of the site which is the majority of the strategic allocation. Reserved matters for two of the development parcels (Parcels 1 & 3) (22/02068/REM) were permitted in April 2023 for 237 dwellings. Reserved matters has also been granted for a spine road (20/03702/REM) and link road (20/03724/REM) serving the school and a foul water pumping station (21/03950/REM). Construction of the first 70 plots in Parcel 1 has commenced , conditions discharged, S106 obligations varied to allow early road construction to facilitate speedier development (21/00653/M106), ground works in place. Infrastructure will be delivered based on the number of occupations meaning that there will be no significant delays in delivering the homes permitted. Persimmon homes are developing the 237 homes in Phases 1 & 3. Discussions are underway on reserve applications for further phases. Charles Church is currently preparing an application (anticipated Jan.'24) for the Phase 2 land (south of Phases 1 & 3 – zoned for 110-122 dwellings). Projection is consistent with build rates on this site and in Banbury generally in recent years. There are two house builders on site. A significant proportion of the site is forecast to be completed within the 5 year period. Developer has indicated that development is likely to be delivered in line with the projection.”</p> <p>Pre-App guidance for a development of 91 homes (23/01301/PREAPP) issued 20 June 2023</p> <p>Developer Submission (Persimmon homes) received on 10 November 2023. This assumes a delivery of 250 within the next 5 years. However, looking at historic delivery in Banbury this appears to be unduly pessimistic projection. (see AMR Table 16)</p>

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>Email correspondence between the LPA and Persimmon (Dated 23 October 2023 to 10 November 2023) provided during preparation of the AMR (CD/K.15 refers).</p> <p>In applying the evidence provided by engagement with the promoter the LPA has also taken into account the latest position of delivery of the site, with 70 plots identified at slab level (or above) as of November 2023 with sales office operating on-site.</p> <p>The Council also notes Persimmon are delivering Phase 1&3 as a single element of the scheme, therefore reference to further 'second and possibly third phases' are in addition to, rather than component parts, of the first Phase 1&3 element.</p> <p>Details of the phasing of other site infrastructure requirements addressed under 20/01099/DISC (Condition 2) are material to the assessment of deliverability for this site. Infrastructure is set to be delivered based on the number of occupations, so this will not present a significant obstacle to delivery as any issues that need to be resolved are being worked on now as a part of delivering an undisputed 237 units including completion of the spine road (see Section 5 of the submitted Phasing Statement – CD/K.25). This corresponds to the Reserved Matters granted for site infrastructure elements including the spine road (20/03702/REM).</p> <p>Finally, the LPA has moderated the forecast build-out of the trajectory in years 4 and 5 compared to the 2022 HLSS but notes that a minimum 273 units forecast completions for the previous period 2022-2027 were accepted as deliverable in the Milcombe Appeal Decision.</p>
Land Opposite Hanwell Fields Recreation (adjacent to	Land Opposite Hanwell Fields Recreation	78	78	0	-78	The AMR states:

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
Dukes Meadow Drive, Banbury)**	(adjacent to Dukes Meadow Drive, Banbury)					<p>“Outline planning application (21/03426/OUT) for up to 78 dwellings and associated open space was approved subject to legal agreement in April 2022. The application was submitted on behalf of a housebuilder, Manor Oak Homes, who will be developing the site. Signing of section 106 agreement is imminent. Projection is consistent with build rates in Banbury generally in recent years”</p> <p>Progress with completion of S106 planning obligation relevant to the AMR commentary includes:</p> <ul style="list-style-type: none"> • S.106 has been drafted by CDC and has been passed to applicant and their legal representative for comment/assessment. This was due to be undertaken towards end of Nov 23. Awaiting further comments from the applicant (CD/K.17 refers). <p>Regarding relevant evidence for development timeframes</p> <ul style="list-style-type: none"> • Site advertised with sales particulars confirming Manor Oak Homes as promoter of the site (CD/K.16) confirming expectation of submission timeframes for Reserved Matters. • Developer Submission (AR Planning for Manor Oak) received on 23 October 2023 which supports the trajectory proposed (CD/K.17 and CD/K.18). <p>No known infrastructure or viability constraints</p> <p>The developer has also responded to the regulation 18 consultation on the Cherwell Local Plan Review and affirmed that in addition to the 78 dwellings currently granted subject to legal agreement a further submission of 117 dwellings would shortly be submitted. The developer can therefore be demonstrated to be committed to bringing this scheme forward.</p>

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						Local evidence for lead-in timeframes (see Table 15) anticipates first completions January 2026.
Land Adjoining Withycombe Farmhouse Stratford Road A422, Drayton *	Land Adjoining Withycombe Farmhouse Stratford Road A422, Drayton	250	50	0	-50	<p>The AMR states:</p> <p>“Outline planning application for a residential development comprising up to 250 dwellings was permitted in February 2023 (22/02102/OUT) subject to the signing of a section 106 agreement which is expected imminently. Developer (Bloor homes) anticipates delivery of homes within the next 5 years and reserve matters application to be submitted imminently. Site is identified in the draft Local Plan Review 2040. Projection is consistent with build rates in Banbury generally in recent years.”</p> <p>Named Housebuilder Bloor Homes</p> <p>Progress with completion of S106 planning obligation relevant to the AMR commentary includes:</p> <ul style="list-style-type: none"> S106 agreed and Decision Notice issued 8 January 2024. <p>Regarding relevant evidence for development timeframes</p> <ul style="list-style-type: none"> Bloor's currently building phase 2 to north from which this site will gain access (see CD/K.20). Intend construction start as early as Q2/Q3 '24, upon completion of 2nd phase. REM application lodged with LPA in October 2023 and validated 8 January 2024 upon issue of Outline PP with cover letter emphasising the developer's objectives of build continuity.

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<ul style="list-style-type: none"> • 3no. Discharge of Conditions Applications submitted January 2024 and pending determination including SW Drainage, Design Code and Phasing Plan (24/00181/DISC, 24/00120/DISC, 24/00121/DISC) • PPA in place seeking determination by 31 March 2024. due imminently. <p>Developer submission (Bloor Homes) received on 13 October 2023 (See CD/K.19) confirming delivery within the five years.</p> <p>In their response to the regulation 18 Cherwell Local Plan Review consultation, the developer suggests that the development of the site will commence in the first quarter of 2024 and yield the following completions:</p> <p>2024 – 48 dwellings 2025 – 63 dwellings 2026 – 63 dwellings 2027 – 63 dwellings 2028 – 13 dwellings</p> <p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions October 2026.</p> <p>Table 16 of the Council's AMR confirms the local evidence for build-out rates on the Wretch Hill / Banbury Rise allocated site adjacent to the north.</p>
21/04112/OUT	OS Parcel 2778 Grange Farm North West Of Station Cottage Station Road Launton *	65	65	0	-65	<p>The AMR states:</p> <p>“Outline application for the erection of up to 65 dwellings granted following an appeal in November 2022. The expected delivery rates allow sufficient lead-in time for Outline and Reserved Matters approvals and construction time.</p>

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>Greencore homes are developing and are advertising the site. A reserved matters application is expected imminently."</p> <p>Named Housebuilder: Greencore Homes Developer website advertising homes https://www.greencorehomeslaunton.co.uk/ This supports assumptions on delivery as the site is being actively promoted by the housebuilders, Greencore.</p> <p>Regarding relevant evidence for development timeframes</p> <ul style="list-style-type: none"> • 23/02290/DISC – Discharge of Condition 16 (Great Crested Newt licence) of 21/04112/OUT. Submitted in August 23 and approved in October 23. • 23/02291/DISC – Archaeological Written Scheme of Investigation) of 21/04112/OUT. Submitted in August 23 and approved in October 23 (app form and decision attached). • Non-Material Amendment application has been submitted in August 2023 associated with Great Crested Newt District Licence. Ref 23/02231/NMA. Approved in Sept 2023 • Pre-app ref 23/01945/PREAPP – enquiry seeking advice from the LPA on the requirements for a Reserved Matters application. Submitted in July 2023 • Reserved Matters application now received. 23/03433/REM validated 5 December 2023. • Further Discharge of Conditions application 23/03518/DISC validated 14 December 2023

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions March 2026.</p> <p>The Council also provides the public consultation boards from Greencore explaining that a reserved matters application is to be submitted in Autumn 2023 and an email from the planning agent to the Council confirming a pre-application. (CD/K.27</p>
Land at Deerfields Farm, Canal Lane, Bodicote *	Land at Deerfields Farm, Canal Lane, Bodicote	26	26	0	-26	<p>The AMR states:</p> <p>“Outline permission was granted in November 2022 for up to 26 dwellings. The expected delivery rates allow sufficient lead-in time for Outline and Reserved Matters approvals and construction time.”</p> <p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions February 2024.</p> <p>No known viability or infrastructure constraints</p> <p>No email response received as part of engagement for preparation of HLSS Update (CD/K.21)</p>
OS Parcel 3489 Adjoining and South West of B4011, Ambrosden *	OS Parcel 3489 Adjoining and South West of B4011, Ambrosden	75	60	0	-60	<p>The AMR states:</p> <p>“Outline application for 75 homes permitted in February 2023 subject to section 106. With permission granted over 9 months ago, the section 106 is expected to be signed shortly.”</p> <p>Progress with completion of S106 planning obligation relevant to the AMR commentary includes:</p> <ul style="list-style-type: none"> Decision Notice issued 19 December 2023 granting Outline Planning Permission including provision for Biodiversity Net Gain to be controlled via condition (Condition 23)

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>Site has been sold to housebuilder (Mulberry Homes) who have contacted the LPA with a view to commencing pre-application discussion on the Reserved Matters.</p> <p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions October 2026.</p>
Land North of Railway House, Station Road, Hook Norton *	Land North of Railway House, Station Road, Hook Norton	43	43	0	-43	<p>The AMR states:</p> <p><i>"Outline application approved following appeal for 43 homes in August 2022. Section 106 is agreed."</i></p> <p>Regarding relevant evidence for development timeframes</p> <ul style="list-style-type: none"> Named Housebuilder: Deanfield Homes Pre-app enquiry submitted by Deanfield Homes in Oct 23 for up to 43 homes. Meeting subsequently undertaken in 8 Nov 23 (Email attached). Pre-App Ref 23/02990/PREAPP (CD/K.22 and CD/K.23 refers) Revised layout discussed subsequent to that pre-app response and comments provided; the applicant is preparing an RM submission expected to provide for 42 homes. <p>No known constraints to development.</p> <p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions June 2025.</p>
Kidlington Garage, 1 Bicester Road, Kidlington *	Kidlington Garage, 1 Bicester Road, Kidlington	15	15	0	-15	<p>The AMR states:</p> <p><i>"Application for 15 flats was granted planning permission in March 2023 subject to the signing of a section 106"</i></p>

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>agreement. Sweetcroft Homes are the developer. This is a full application and expected to be built out well within the five year period.”</p> <p>Progress with completion of S106 planning obligation relevant to the AMR commentary includes:</p> <ul style="list-style-type: none"> • Email update provided July 2023 from LPA to Applicant (CD/K.24 refers) • The Council received an engrossed version of the s106 agreement on the 3.1.2024 and it is anticipated that planning permission will be granted prior to the end of February 2024 subject to checks via Land Registry <p>Local evidence for lead-in timeframes (see Table 15) anticipates first completions December 2023 (i.e., delivery somewhat beyond typical timescale.</p>
18/00825/HYBRID **	Former RAF Upper Heyford	1,175	488	138	-350	<p>The AMR states:</p> <p>“A new Hybrid application for 1175 dwellings was approved in September 2022. Reserved matters (22/02255/REM) is approved for phase 10 for 138 dwellings. The Councils latest monitoring shows that foundations are in place for the majority of the homes with some near completion. Recent history of delivery on the site with 250 dwellings completed in 2022/23. Dorchester is a long standing and active developer on the site and there are two developers at Heyford Park. Dorchester Living are in partnership with Picture Living who will deliver private rented dwellings. Over the last five years an average of 100 new homes per year were built at Heyford Park. It is anticipated that this level of delivery will continue. Dorchester anticipate that they will deliver over 150 dwellings per year going forward including delivering phase 10 at the same time as future phases. They do not identify any infrastructure constraints to delivery. Discussions are occurring with the</p>

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p>developer concerning future reserved matters applications which are expected shortly. Dorchester's website indicates a range of new homes for sale."</p> <p>Developer Submission (Dorchester) received on 3 November 2023. Dwellings delivered during the 5 year period.</p> <p>It should be noted that the developers are projecting a faster rate of delivery than assumed by the Council.</p> <p>Dorchester's committed new build completions to end Q1 2028 = 23 dwellings (built and occupied in the last 6 months at Phase 9A approved under 16/02446/F) + 270 (approved and under construction in Phases 9B – 9G also approved under 16/02446/F) + 5 (new occupations at Phase 8C under 19/00446/F in last 6 months) + 9 (built but not yet occupied at Phase 8C) + 34 (built and occupied in last 6 months in Phases 5C and 7A approved under 10/01642/OUT, 19/00439/REM & 19/00440/REM) + 138 (currently under construction at Phase 10 and approved under 22/02255/REM) = 479 dwellings.</p> <p>In addition, Dorchester also anticipate the following additional completions within the next five years based on their phasing plan submission as previously indicated under 22/03016/DISC (subsequently Withdrawn):</p> <p>6 dwellings (at Phase 13) + 114 (Phase 11) + 62 (Phase 17) which are all due to be the subject in new reserved matters application submissions in Feb. 2024 and with construction expected Q1/Q2 2025 = 182.</p> <p>These additional occupations all appear quite likely to the LPA.</p> <p>Dorchester also suggest that:</p> <p>100 dwellings (at Phase 23A) + 100 (56% of Phase 16) + 16 (Phase 39) + 62 (62% of Phase 23B) + 42 (42% of Phase 12) = 320 dwellings could all come forward over the next 5 years.</p>

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						That would bring construction and occupation rates up to almost 200dpa, which is not considered likely by the LPA so have not been included in the Council's supply calculations.
18/01882/OUT Banbury 18 **	Drayton Lodge Farm, Banbury	320	250	180	-70	<p>The AMR states:</p> <p>“Outline permission for up to 320 dwellings is secured. The site was acquired by Vistry Group which consist of Bovis Homes and Linden Homes in November 2020. Reserved matters application (22/02357/REM) has now been approved in May 2023. Most conditions have now been discharged. Projection is consistent with build rates in Banbury generally in recent years. Developer has estimated that the majority of the site will be built out in 5 year period and they will start on site in early 2024..”</p> <p>Regarding relevant evidence for development timeframes and build-out:</p> <ul style="list-style-type: none"> • Correspondence from Vistry informing CDC of Management Company to transfer for areas of open space including play areas, sports pitches, all ecological areas and potentially the SUDs features (email attached March 23). CDC advised that such details would need to form a DISC application and required prescribed info contained within schedule 3 (April 23) (see CD/K.29). • Construction vehicle routing discussed in July 2023 following complaints from residents about traffic through Hanwell village. Email sent to applicant confirming approved routing with the CTMP (CD/K.28). • Developer Submission (Vistry Homes) received 10 November 2023 (CD/K.30). Generally supports the Council's assumptions and states in relation to build-out and the Council's maximum forecast of 75dpa:

LPA ref:	Address	Capacity (Net)	Council 5YHLS	Appellant 5YHLS	Difference	Indicators of Firm Progress and Clear, Relevant Information in Support of the Council's Assessment
						<p><i>"with the market how it is, we are assuming it will be around 30 for 2024 then 50 per annum onwards.....so built out by 3030. But this may be more in line with your assumption should the market get back on track again."</i></p> <p>In applying the evidence provided by engagement with the promoter the LPA notes the response does not expressly forecast completions by monitoring year.</p>
14/02121/OUT Bicester 1 ***	North West Phase 2	1,700	100	0	-100	<p>The AMR states:</p> <p><i>"Outline planning permission for 1700 homes on land to the north of Middleton Stoney Road, forming part of the wider North West Bicester strategic allocation was secured by P3EcoLtd on 30 January 2020. A Reserved Matters application (21/02339/REM) for 500 of the 1700 homes (forming phase 1) was submitted on behalf of Countryside Properties in July 2021 and was subsequently withdrawn. Applications continue to be submitted for Discharge of Conditions (including Phasing Plan and Design Code) and Reserved Matters for access arrangements, road layouts and a first residential phase of 123 dwellings (23/00214/REM, 23/00170/REM, 23/01493/REM and 23/01586/REM and 23/00207/DISC, 23/01496/DISC and 23/01558/DISC). The active engagement between developer (Cala homes) and Council relating to delivery of Reserved Matters are separate to restrictions imposed by infrastructure delivery as 500 dwellings are permitted on the site for 1700 dwellings prior to strategic infrastructure needing to be in place. Cala homes have submitted a phasing plan which indicates development will start in 2024. Due to the absence of reserved matters permission the site will not deliver homes before 2026/27."</i></p> <p>Further Discharge of Conditions application 23/03546/DISC validated 19 December 2023 for Landscape and Habitat Management Plan upon Phase 2A only.</p>

(* = new part B sites not covered in previous iterations of the HLSS; ** = Part B Site Detailed Permission Granted Since 1 April 2023; *** = Part B Site with no Detailed Permission but included in previous assessments)

7.0 SUMMARY AND CONCLUSIONS

7.1 These conclusions should also be taken as providing a summary of my Proof of Evidence.

7.2 My overall conclusion is that the Council can demonstrate **5.74 years' deliverable supply** against the relevant housing requirement following my assessment in the preceding sections. This is set out in Table 18 below, corresponding to Council's case to be presented in draft HLS Topic SoCG at the point of exchanging evidence (CD/G.5).

Table 18. Components of Five-Year Housing Land Supply

	Step	Description	LHN 2024 + NPPF(Dec)2023 Buffer Changes
Five-Year Requirement	a	Standard Method Requirement (2023/24-2027/28)	3515
	b	Annual Requirement (a / 5)	703
	c	Requirement Over 4 Years (b x years)	2812
	d	4 Year Requirement plus 5% buffer (c + 5%)	N/A
	e	Revised Annual Requirement over next 5 years (d / 5)	703
Components of Supply	(i)	<i>Banbury Supply</i>	1483
	(ii)	<i>Bicester Supply</i>	718
	(iii)	<i>Other Areas</i>	1587
	(iv)	<i>Windfall</i>	250
	f	Deliverable Supply over next 5 Years	4038
Years' Supply	g	Total years supply over next 5 years (f/ e)	5.74
	h	'Shortfall' / Surplus(f – c)	+1226

7.3 The calculation reflects a surplus in excess of the relevant requirement and indicates that the policies most important for determining the Appeal proposals remain up-to-date. Paragraph 11(d) is therefore not engaged for the purposes of decision-taking on the basis of footnote 8.

7.4 In **Section 2** of my original Proof of Evidence I provide an overview of my understanding of the Appellant's case on the matter of housing land supply. I establish that there is a substantial level of disagreement between the parties in relation to the calculation of the requirement against which supply should be assessed.

7.5 As part of preparation of this Supplemental Proof of Evidence I have also outlined that the Appellant intends to substantially contest the Council's assessment of deliverable supply. Nevertheless, on the Council's case – that the requirement is provided by local housing need calculated for Cherwell District – the Appellant's own position on supply (which the Council does not accept) based on evidence exchanged for earlier Appeals in the district would result in 4.02 years' supply.

7.6 Within this section I identify that there is agreement between the parties that the Cherwell

Local Plan (Part 1) (adopted July 2015) including relevant strategic policy **BSC1** is more than five years old. It is further agreed that following the latest review in accordance with Regulation 10A (February 2023) (CD/I.13) the housing requirement within its adopted strategic policies requires updating for the purposes of NPPF2023 paragraph 77 and footnote 39.

- 7.7 The policy of the NPPF at paragraph 77 and footnote 42, to apply local housing need where the strategic policies are more than five years old and to use the standard method for Cherwell District, is therefore applicable.
- 7.8 The parties agree that the 'Cherwell Local Plan 2011-2031 (Part 1) Partial Review- Oxford's Unmet Housing Need' (CD/I.3) or "Partial Review" was adopted on 7 September 2020 and that relevant strategic policies **PR1 and PR12a** are less than five years old.
- 7.9 These respectively specify the contribution towards unmet needs (4,400 dwellings) and arrangements for maintaining housing land supply to meet these needs. I outline that that there is no suggestion from the Appellant that these policies should be subject to the conclusions of a Regulation 10A Review in order to be considered up-to-date.
- 7.10 In **Section 4** of my original Proof of Evidence and as updated by **Section 2** of this Supplemental material I consider the most recent assessment of supply for Cherwell District Council comprising the Housing Land Supply Statement (CD/K.11) published in December 2023. The published position provides the starting point to the Council's case for this Appeal.
- 7.11 I set out that the published position reflects separate monitoring of the housing requirement within the separate adopted strategic policies of the Partial Review in relation to providing a contribution towards part of Oxford's unmet needs. This is central to the disagreement between the parties.
- 7.12 I have outlined my position that the calculation of local housing need should utilise the most recent inputs in accordance with PPG ID: 2a-004-20201216 and provide reference to numerous Appeal decisions supporting my evidence. The calculation of local housing need is undertaken independently from the assessment of supply. Applying the relevant chapter of the PPG relating to the assessment of housing needs consistently and objectively for the purposes of decision-taking and its relationship with plan-making is underpinned by the use of the most recent inputs.
- 7.13 In **Section 3** of this Supplemental material I address the implications of the most recent changes to national policy in revised National Planning Policy Framework first published 19 December 2023 ('NPPF(Dec)2023'). I confirm that this results in no changes to the annual requirement against which supply should be assessed, save no buffer being applied and forecast deliverable supply should continue to be considered for the five year period. I confirm that the policy in paragraph 226 to the NPPF(Dec)2023 applies and under the provisions of paragraph 77 the extent of deliverable supply identified must provide for a minimum 4 years' supply.
- 7.14 The contents of the Cherwell Local Plan Review 2040 – Regulation 18 Consultation Draft published for consultation between 22 September 2023 and 3 November 2023 identify sites for housing and satisfy the requirement for the inclusion of a policies map for the purposes of a Local Plan under preparation (prior to its submission) under regulation 5(a) of The Town and Country Planning (Local Planning) (England) Regulations 2012 and any accompanying maps as specified in regulation 5(b).
- 7.15 Section 3 of this Supplemental Proof of Evidence should be read alongside **Section 5** of my original Proof where I respond to the Appellant's case for the requirement against which supply is assessed. I provide evidence in support of the Council's position.

- 7.16 I illustrate that the Council's case that local housing need provides the requirement against which to assess supply is simple. It is consistent with national policy and accords with the adopted development plan and supported by relevant Appeal Decisions^{11 12}.
- 7.17 The Council's case is reinforced by the clear approach to accounting for supply related to Oxford's unmet needs, which remains as set out in adopted strategic policies of the development plan that are less than five years old and fully consistent with national policy. These provide for a specific approach to managing supply for the housing requirement related to these needs. The approach to managing supply is consistent with the spatial strategy to provide for sustainable development and tested as part of plan-making.
- 7.18 The Council's case is entirely in accord with NPPF(Dec)2023 Paragraph 77. It does not conflate the assessment of need and approach to managing supply, which underlies why the Appellant's position should not be followed.
- 7.19 I have demonstrated why the Appellant's case represents a departure from the adopted development plan and represents an alteration of the approach to manage supply towards unmet needs. It is an approach that is not consistent with national policy and has not been tested at Examination.
- 7.20 I explain that Paragraph 77 of the NPPF, not being the adopted development plan, cannot and does not seek to change the housing requirement set out in the adopted development plan. By referring to "*adopted strategic policies*" in the plural, the NPPF contemplates that regard may need to be had to more than one strategic policy.
- 7.21 Paragraph 77 of the NPPF2023 has two limbs and must be interpreted and applied as such for the purposes of decision-taking. It first requires identification of the housing requirement in adopted strategic policies. It second directs circumstances where local housing need provides the requirement against which to assess supply.
- 7.22 NPPF(Dec)2023 Paragraph 77 is therefore clear regarding the use of local housing need to assess housing land supply in the circumstances of Cherwell District. The calculation of LHN operates housing need purely on administrative boundaries and makes no reference to unmet need.
- 7.23 My evidence illustrates that while NPPF(Dec)2023 Paragraph 77 is very clear regarding LHN, neither that paragraph, the PPG nor the inputs to the standard method calculation indicate that the method by which housing supply is to be accounted for should alter.
- 7.24 In the case of Cherwell District, the method to account for supply is provided by separate policies related to Oxford's unmet needs within the Partial Review.
- 7.25 It follows that that the circumstances of the housing requirement in adopting strategic policies related to the contribution towards part of unmet needs in Cherwell District could be (and are) distinct from those in the Vale of White Horse and other neighbouring Oxfordshire authorities. I have highlighted differences in the approach to plan-making between the authorities, including site selection, the distribution of growth and where exceptional circumstances have been identified to support the amendment of Green Belt boundaries and provide further details in my Appendix 2. This provides a distinction with the *Grove* Appeal Decision (CD/M.18).
- 7.26 I further outline that no weight should be given to the Council's emerging Plan for the purposes of the requirement against which supply should be assessed, having regard to the

¹¹ Appeal Ref: APP/J1860/W/21/3289643 Land at Leigh Sinton Farms, Leigh Sinton Road (B4503), Leigh Sinton, Malvern (CD/I.21)

¹² Part Parcel 0025, Hill End Road, Twyning, Gloucestershire, GL20 6JD, 389971, 237249 PINS Ref: 3284820 (CD/I.24)

early stage of plan-making and untested nature of the evidence base with respect of managing the housing requirement and distribution of growth. Emerging approaches to plan making have no effect upon the operation of NPPF(Dec)2023 paragraph 77 and the separate adopted strategic policies to address part of Oxford's unmet needs within the Partial Review.

- 7.27 In **Section 6** (and calculation at Appendix 1) of my original Proof of Evidence I address the Housing Delivery Test (HDT). The HDT cannot determine the approach to calculating the housing requirement and housing land supply, which is a separate subject, but its operation in Cherwell is consistent with the Council's position on the requirement against which supply should be assessed. Updated calculations are provided in **Section 5** of this Supplemental Proof of Evidence.
- 7.28 In **Section 6** of this Supplemental Proof of Evidence I provide updated observations on the Council's assessment of supply (CD/3.14) and have responded to the Appellant's case on disputed sources of deliverable supply from specific sites based on the contents of the draft Topic Statement of Common Ground currently under preparation (CD/G.5).
- 7.29 I do not consider that the Appellant's details of disputed supply amount to a deficit against the relevant requirement. I do not consider that the Appellant's approach to disputing supply is consistent or objective, having regard to national policy and guidance. While I provide this view without prejudice to more detailed consideration of the published assessment that may be necessitated following the exchange of evidence it is my opinion that each site identified within the disputed supply is capable of satisfying the central test of a realistic prospect for completions beginning within five years.
- 7.30 The characteristics of the sites identified within the disputed supply are such that where part (b) of the NPPF2023 definition of deliverable applies matters assessed by the Council in its judgement at the base date, and progress since 1 April 2023, are capable of constituting clear evidence of a realistic prospect. Details of the sites are such that the examples of evidence available to demonstrate deliverability can generally be considered to indicate firm progress and clear, relevant information of delivery expectations (ID: 68-007-20190722).
- 7.31 Within this section I identify the removal of 83 units' supply from the published position, reducing slightly the extent of disagreement between the parties.
- 7.32 The conclusions of this section of my Proof of Evidence and evidence for the deliverability of disputed sites result in 4,038 units' deliverable supply. This amounts to a **5.74 years' supply against the relevant housing requirement** as shown in Table 17 above.
- 7.33 The Council's case is that the policy in paragraph 226 to the NPPF(Dec)2023 applies and under the provisions of paragraph 77 the extent of deliverable supply identified must provide for a minimum 4 years' supply. The Council's case is therefore that it can demonstrate a surplus of 1,226 dwellings.

APPENDICES

APPENDIX 1

ANALYSIS OF LOCAL LEAD-IN TIMEFRAMES BASED ON TABLE 39 OF THE DECEMBER 2023 AMR

Appendix 1

Local Lead-In Timeframes

Based on Table 39 of the December 2023 AMR

Appeal Ref: APP/C3105/W/23/3327213

LPA Ref: 22/02866/OUT

On behalf of Cherwell District Council

Appeal Site: Land East of Ploughley Road, Ambrosden, OX25 2AD

APPENDIX 1 LOCAL LEAD-IN TIMFRAMES FROM AMR TABLE 39

Planning Application	Reserved Matters of Application first permits development (and notes)	First Permission	Date Received	Date Validated	Date Approved First Permission	RM Date Received	RM Date Validated	Date Approved First Permits Development	First Completions (Estimate)	Site	Dwellings with planning permission
19/00963/OUT*	22/00959/REM	Outline	24/05/2019	24/05/2019	20/01/2020	30/03/2022	11/04/2022	12/11/2022	01/09/2023	OS Parcel 9100 Adjoining And East Of Last House Adjoining And North Of Berry Hill Road Adderbury	40
13/01768/F		Full	21/11/2013	25/11/2013	19/06/2014				01/03/2015	East of Deene Close, Aynho Road, Adderbury	60
14/00250/F		Full	17/02/2014	17/02/2014	01/12/2014				01/03/2017	Land North of Milton Road, Adderbury	37
21/01227/F		Full	08/04/2021	07/05/2021	08/12/2021				31/01/2018	Land off Banbury Road, Adderbury	25

Planning Application	Reserved Matters of Application first permits development (and notes)	First Permission	Date Received	Date Validated	Date Approved First Permission	RM Date Received	RM Date Validated	Date Approved First Permits Development	First Completions (Estimate)	Site	Dwellings with planning permission
13/00621/OUT	15/00480/REM	Outline	29/04/2013	08/05/2013	02/04/2014	18/03/2015	30/03/2015	13/10/2015	01/09/2016	Ambrosden Court, Merton Road, Ambrosden	44
16/02370/F		Full	23/11/2016	09/12/2016	25/01/2018				01/09/2018	Church Leys Field, Blackthorn Road, Ambrosden	85
18/01881/F		Full	30/10/2018	30/10/2018	28/03/2019				31/01/2018	Land North of Station Road, Bletchingdon	61
11/00617/OUT	16/01599/F	Outline	12/04/2011	13/04/2011	26/03/2012				31/01/2019	Cotefield Farm, Bodicote	4
16/01587/F 14/02156/OUT	18/00193/REM	Outline	29/12/2014	08/01/2015	03/10/2016	31/01/2018	06/02/2018	28/08/2018	01/07/2019	Cotefield Farm, Bodicote Phase 2, Bodicote	95

Planning Application	Reserved Matters of Application first permits development (and notes)	First Permission	Date Received	Date Validated	Date Approved First Permission	RM Date Received	RM Date Validated	Date Approved First Permits Development	First Completions (Estimate)	Site	Dwellings with planning permission
14/01737/OUT	16/00219/REM	Outline	13/10/2014	15/10/2014	02/02/2016	04/02/2016	17/02/2016	09/12/2016	31/01/2018	The Paddocks, Chesterton	45
20/02083/OUT*	22/02570/REM	Outline	31/07/2020	05/03/2021	16/08/2022	22/08/2022	22/08/2022	17/01/2023	01/09/2023	Hempton Gate Land North Of Hempton Road And West Of Wimborn Close Deddington	14
19/00831/OUT*	21/01278/REM	Outline	07/05/2019	20/05/2019	19/10/2020	09/04/2021	30/04/2021	23/12/2021	01/09/2023	Land South Of Home Farm House Clifton Road Deddington	15
18/02147/OUT	20/03660/REM	Outline	11/12/2018	11/12/2018	06/04/2020	21/12/2020	14/01/2021	23/08/2021	31/01/2022	Stone Pits, Hempton Road, Deddington	21

Planning Application	Reserved Matters of Application first permits development (and notes)	First Permission	Date Received	Date Validated	Date Approved First Permission	RM Date Received	RM Date Validated	Date Approved First Permits Development	First Completions (Estimate)	Site	Dwellings with planning permission
14/00844/OUT	17/00950/REM	Outline	27/05/2014	27/05/2014	08/12/2015	28/04/2017	10/05/2017	21/12/2017	01/09/2018	Land North of Hook Norton Primary School And South Of Redland Farm, Sibford Road, Hook Norton	54
17/02023/O56		Full	03/10/2017	10/10/2017	24/11/2017				01/09/2021	2-4 High Street, Kidlington	16
12/01321/OUT		Outline	17/09/2012	17/09/2012	22/11/2012				01/09/2015	4 The Rookery, Kidlington	20
17/01556/F		Full	21/07/2017	27/07/2017	02/07/2018				01/09/2021	British Waterways Site, Langford Lane, Kidlington	10
15/01872/F		Full	14/10/2015	16/11/2015	03/01/2018				31/01/2020	Co Op, 26 High Street, Kidlington	54

Planning Application	Reserved Matters of Application first permits development (and notes)	First Permission	Date Received	Date Validated	Date Approved First Permission	RM Date Received	RM Date Validated	Date Approved First Permits Development	First Completions (Estimate)	Site	Dwellings with planning permission
19/02341/F		Full	18/10/2019	18/10/2019	28/05/2021				01/07/2020	Kidlington Green Social Club 1 Green Road Kidlington	32
18/01388/F		Full	02/08/2018	02/08/2018	28/03/2019				31/10/2020	Kings Two Wheel Centre, 139 Oxford Road, Kidlington	10
17/01173/OUT*	19/02419/REM	Outline	26/05/2017	30/05/2017	18/09/2018	29/10/2019	11/11/2019	30/04/2020	01/07/2021	South East of Launton Road And North East of Sewage Works, Blackthorn Road, Launton	66
15/02068/OUT	19/00046/REM	Outline	11/11/2015	11/11/2015	27/10/2017	09/01/2019	09/01/2019	22/01/2020	31/05/2021	Land North of The Green and adj. Oak Farm Drive, Milcombe	44
19/02948/F		Full	19/12/2019	09/01/2020	28/06/2021				01/09/2022	Land to the South of South Side Steeple Aston	10

Planning Application	Reserved Matters of Application first permits development (and notes)	First Permission	Date Received	Date Validated	Date Approved First Permission	RM Date Received	RM Date Validated	Date Approved First Permits Development	First Completions (Estimate)	Site	Dwellings with planning permission
13/01796/OUT	16/00574/REM	Outline	27/11/2013	28/11/2013	07/04/2015	24/03/2016	15/04/2016	20/12/2016	01/09/2022	Land North of Oak View, Weston on the Green	20
20/01561/F*		Full	16/06/2020	30/07/2020	18/02/2021				01/09/2023	The Ley Community, Sandy Lane, Yarnton	10

- * Reflects estimated date of first completions following commencement

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