



THE TOWN AND COUNTRY PLANNING ACT 1990, SECTION 78

**THE TOWN AND COUNTRY PLANNING APPEALS
(DETERMINATION BY INSPECTORS) (INQUIRIES PROCEDURE)
(ENGLAND) RULES 2000 (SI 2000/1625)
(AS AMENDED)**

Appeal by David Wilson Homes (Southern)

against the refusal of its application for planning permission for:

Outline planning application (with all matters reserved except for access into the site) for up to 300 dwellings and provision of public open space including associated landscape planting with associated infrastructure, drainage measures and earthworks and all other associated works

at

**Land East of Grove, East of the A338 Station Road, North of
Tulwick Lane**

Planning Inspectorate Ref: APP/V3120/W/22/3310788

Vale of White Horse District Council Ref: P22/V0550/O

**Proof of Evidence of Thomas Rice MRTPI
in relation to Housing Land Supply**

February 2023

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1. WITNESS BACKGROUND AND STATEMENT OF TRUTH

- 1.1. I am Thomas Rice, a Principal Planning Policy Officer working for the Vale of White Horse District Council and South Oxfordshire District Council. I hold a Bachelor of Arts degree in History and Political Science from the University of Birmingham (2012), and a Master of Science degree in Spatial Planning from Oxford Brookes University (2015).
- 1.2. I am a Member of the Royal Town Planning Institute and have been since August 2017.
- 1.3. I have worked in Town Planning since October 2012, starting work in Planning Policy at South Oxfordshire District Council. In 2015 I joined Barton Willmore as a Senior Planning Consultant, working there for two years before re-joining South Oxfordshire District Council as a Senior Planning Officer in September 2017. In August 2019 I left to work for the Planning Policy Team at Oxford City Council as a principal planning policy officer and returned to the District Councils in August 2021.
- 1.4. I was involved in the council's Regulation 10A review (five-year) for the Local Plan Part 1 and I have project managed the 2022 Housing Land Supply Statements for both District Council's.
- 1.5. The evidence which I have prepared and provide for this appeal (reference APP/V3120/W/22/3310788) in this proof of evidence is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute, and I confirm that the opinions expressed are my true and professional opinions.

2. INTRODUCTION

- 2.1. I have prepared this evidence to support the Vale of White Horse District Council's (the council) five-year supply of deliverable housing sites. The council's position is set out in its Housing Land Supply Statement (November 2022) (CD3.1) (the land supply statement).
- 2.2. The council's land supply statement demonstrates a land supply of **6.29 years**. This follows the council's Regulation 10a¹ (CD1.5) review that it prepared, published and adopted without legal challenge in December 2021.
- 2.3. This evidence does not deal with the potential implications of any shortfall in the context of the "tilted balance", if this were considered to be engaged in the determination of this appeal. This matter is addressed in the evidence of Stuart Walker who assesses the overall planning policy context and weight to be given to development plan policy and other material considerations in the planning balance.
- 2.4. This proof summarises the council's position on the housing requirement and our approach to the ring fence area in the context of the Regulation 10a review which the council undertook in 2021, was approved by the council's Cabinet in December 2021.
- 2.5. The Appellant has confirmed that they consider a number of sites included within the council's supply to be undeliverable. Shortly after the Case Management Conference with Inspector Bore on 24 January 2023, the Appellant provided, via an updated Housing Land Supply Statement of Common Ground (HLSoCG), a list of 12 specific disputed sites and an indication that the contribution from small, category A sites was inappropriate.
- 2.6. However, at the time of preparing my evidence no further detail has been provided as to why these sites are disputed. As such, and until such time as the

¹ Regulation 10A of the Town and Country (Local Planning) (England) Regulations 2012 (as amended)

Appellant's reasoning is fully clear, the council proposes to deal with any comments or evidence in rebuttal.

- 2.7. Conversely, the council's comprehensive housing land supply assessment has been in the public domain since November 2022.
- 2.8. It is not my intention to repeat the relevant paras. of the NPPF (CD5.5) or guidance contained in the Housing Supply and Delivery PPG (CD5.7), which are also set out in the land supply statement (CD3.1), and as per the Inspector's requirements.
- 2.9. My evidence responds to the Appellant's conclusions in respect of housing land supply as set out in their Statement of Case and as referenced in the council's Statement of Case.

3. THE REGULATION 10A REVIEW: HOUSING REQUIREMENT

- 3.1. The council's Regulation 10a review identifies why it now uses the local housing need calculated using the standard method for its housing requirement. The council prepared this assessment considering the evidence that the PPG "Plan-making" (CD5.6) suggests LPAs should consider when determining whether plan policies should be updated². The council supplemented this assessment with the Planning Advisory Service's (PAS) "Local Plan Route Mapper" (see **Appendix 1** of my evidence) to ensure a thorough and comprehensive assessment.
- 3.2. This process identified that the housing requirement in Core Policy 4 required updating for the following reasons.

Reason one: the local housing need figure has changed significantly

- 3.3. The updated standard method figure for the Vale of White Horse in 2022 was 661 dwellings per annum, an increase from 636 the previous year when the council undertook its review. Therefore, government's local housing need assessment for the Vale of White Horse remains around 35% lower than the housing requirement in Core Policy 4.
- 3.4. The standard method (government's default assessment of need) identifies a reduction of need compared to Core Policy 4 of 392 DPA (or 35%). This is a significant margin, and demonstrates that the housing need underpinning LPP1 has changed significantly.
- 3.5. This difference is because the objectively assessed needs (OAN) contained within the Oxfordshire Strategic Housing Market Assessment (SHMA, 2014) (CD3.4) that underpin LPP1 were prepared in line with the NPPF 2012. Since the adoption of the plan, national policies for calculating housing need and housing requirement have changed significantly. The standard method for calculating Local Housing Need does not consider the potential for employment

² Planning Practice Guidance, "Plan Making", Paragraph: 065

growth in Oxfordshire in the same way that previous guidance allowed for, nor does it do the same for affordable housing needs. This is because the standard method follows a simpler assessment of need focussed on household growth projections with a modifier for affordability, rather than seeking to identify past trends of employment growth and project these forward along with commuting ratios.

- 3.6. Furthermore, the SHMA was based on the 2011-based interim household projections while the standard method utilises the 2014-based projections. The 2011-based interim projections only gave household projections to 2021, while the 2014-based projections go to 2039 and give a more robust assessment of need. Since the date of the regulation 10a review, these interim 2011 projections have become even older. Consequently, I do not believe it is possible to directly compare the outputs of the SHMA and those from the Standard Method.
- 3.7. Current national guidance does allow for local authorities to make an uplift for their housing needs during plan-making where they believe needs may be higher than the standard method indicates³. This is a process that the new Joint Local Plan will need to address, and a Section 78 appeal is not the correct mechanism for identifying any need other than that in the development plan or the standard method. However, for reference, I have set out the example circumstances that the PPG identifies for plan making and how they currently affect the Vale of White Horse:

A) growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals)

- 3.8. The Appellant also argues that the Oxfordshire Housing and Growth Deal (Growth Deal) provides justification for retaining the housing requirement in Core Policy 4. The council's Regulation 10a review considers this in detail (see page 54 of the review) with the key points being:

³ PPG, Housing and Economic Needs Assessment, Paragraph 010

- i. the Growth Deal commitment of delivering 100,000 homes between 2011 and 2031 is entirely consistent with the Oxfordshire SHMA (2014), which identified a need of 100,000 homes in the same period.
- ii. all housing sites associated with Growth Deal funding in the Vale of White Horse now have planning permission or are under construction, and
- iii. LPP1 and LPP2 will still contain the allocations required to meet the Growth Deal in full, and therefore supply will be unaffected.

3.9. Furthermore, since December 2021 the circumstances surrounding the Growth Deal have changed. Firstly, Oxfordshire authorities are no longer pursuing the Oxfordshire Plan 2050, one of the conditions of the Growth Deal. Secondly, two of the five Oxfordshire authorities are planning to meet their Growth Deal commitments by 2035/36. Both South Oxfordshire and Oxford City Council's plans extend beyond the 2031 deadline of the Growth Deal yet address some of that need up to 5 years after the date.

B) strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or

3.10. The council is not aware of any infrastructure that will drive the demand for homes locally (for example, an NSIP such as a power plant requiring significant local labour demand).

C) an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground

3.11. The council has agreed to take on unmet need from Oxford City Council.

D) situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.

3.12. Housing delivery in the Vale of White Horse has been higher than the standard method since 2015/16. However, there is no recently published housing needs assessment identifying a need higher than the standard method. The

Oxfordshire SHMA was published in 2014 and is based on 2011 interim household projections. It is therefore not a recent assessment of housing need.

- 3.13. Some of these circumstances could indicate that there would be exceptional circumstances to depart from the standard method in the Vale of White Horse. However, that is a plan making decision, and there is no scope within a decision taking exercise to identify a need other than that in adopted housing policies, or the government's standard method.
- 3.14. It is important to reiterate that the changes in national policies and guidance regarding housing requirement since the preparation of the Oxfordshire SHMA and adoption of LPP1 are significant. They were introduced by the Government following extensive consultation and in the wake of concerns about the reliability of the previous OAN methodology. The standard method was intended to ensure a more consistent approach.
- 3.15. Previously, employment growth and affordable housing need factors were included in the district's objectively assessed housing needs, and were not considered alongside other plan-making criteria (for example constraints such as infrastructure capacity, Green Belt and Areas of Outstanding Natural Beauty) before adding into a housing requirement.
- 3.16. Under current NPPF policy, a new local plan would be tested against different national policies and guidance from those in place at the time of LPP1. For example, the current NPPF is clear that addressing affordable housing is part of identifying requirement, not need⁴, while employment needs are dealt with separately from assessing housing need⁵
- 3.17. Therefore, the policy framework for setting need, the mechanism for calculating need, and the outputs of the respective needs assessments are significantly different. The effect is that the LPP1 had to identify and address employment and affordable housing needs, while the new NPPF would make this a matter for establishing the housing **requirement** in the new plan. This means that the

⁴ Paragraph 62

⁵ Chapter 6 Building a strong, competitive economy

district's constraints would be a consideration in whether it is appropriate to plan for this need.

- 3.18. The PPG gives one example of where local housing need “*will be considered to have changed significantly*” where the housing requirement is not based on the standard method, and that is where a plan has been adopted “*on the basis of a number that is significantly below the number generated using the standard method*” (ID:61-062-20190315). The PPG gives no guidance on the contrasting position of a number that is significantly higher than the standard method figure. In the absence of any specific guidance, the council considers that whether this scenario would be a significant change is a matter for planning judgment, having regard to the particular circumstances of the case.

Reason two: diminishing market demand and capacity to deliver the requirement

- 3.19. Paragraph 61 of the NPPF requires local planning authorities to consider market signals when assessing whether they should plan for an alternative approach to the standard method.
- 3.20. As shown on Table 1 below, since the start date of the plan period there have been fluctuations in housing completions. The housing requirement set out in Policy CP4 has been successfully matched with housing completions in 7 of the last 11 years.

Table 1: Housing completions and Policy CP4 requirement 2011 to 2022			
Year	Completions	CP4 Requirement	Difference
2011/12	346	1,028	-682
2012/13	270	1,028	-758
2013/14	586	1,028	-442
2014/15	739	1,028	-289
2015/16	1,132	1,028	104
2016/17	1,609	1,028	581
2017/18	1,573	1,028	545
2018/19	1,258	1,028	230
2019/20	1,601	1,028	573
2020/21 (Covid-19)	1,108	1,028	80
2021/22	1,213	1,028	185

- 3.21. In 2020 the covid-19 pandemic affected housing delivery as shown on Table 1 above, with a 31% drop from the previous monitoring year (2019/20). Furthermore, on 1 January 2021, the Brexit transition period ended having a detrimental impact on the construction industry.
- 3.22. This is reflected in the 2021/22 housing completions that were around a quarter lower (24%) than those achieved before the end of the Brexit transition period and covid (2019/20).
- 3.23. Furthermore, the ongoing war in Ukraine and associated cost of living crisis is likely to have further depressing effects on the economy. Brexit is also now cited as having a £100bn a year impact on the British economy (**Appendix 2**).
- 3.24. It is difficult to predict whether this will recover or be a longer-lived effect. LPP1 identified a housing supply and trajectory that would build out over the 20-year plan period to 2031. Over the plan period so far, more homes have been committed (allocations and planning permissions) than have been built (housing completions). However, there is always a lag between the council

granting planning permission and a developer building out a site. Within our trajectory there are significant allocations without detailed planning permission (such as Monks Farm (117 dwellings), Valley Park (4,254 dwellings), Northwest Valley Park (800 dwellings), Dalton Barracks (1,200 dwellings), Land east of Kingston Bagpuize with Southmoor (600 dwellings), and North West of Grove (400 dwellings) which will continue high delivery trends later in the plan period. These allocations and extant planning permissions will remain in place, regardless of the housing requirement.

- 3.25. The Appellant argues at Paragraph 6.6 of their statement of case that there is a worsening housing crisis in this country. However, as shown above there are significant downward pressures on the market. Paragraph 74 and footnote 38 of the NPPF are clear that the standard method is the way to address need. A lower housing requirement in the absence of an up to date local plan policy better reflects the demand and capacity.

Reason three: strong housing delivery test performance

- 3.26. The Vale of White Horse has performed strongly against Housing Delivery Test targets since their introduction. Results from previous years are as follows:

- 2021 – 195%
- 2020 – 208%
- 2019 – 236%
- 2018 – 334%

- 3.27. The HDT is assessed against the council's local housing need calculated using the standard method plus agreed unmet housing need, rather than the higher annual requirement contained in the development plan. This emphasises that the standard methodology provides a figure that is wildly and consistently different from the development plan. This supports the view that Core Policy 4 identifies a requirement that is too high.
- 3.28. Consequently, a change in the housing requirement to the standard method would bring consistency with the HDT and is unlikely to affect the council's performance against the HDT.

Reason four: Authority Monitoring Report performance

3.29. Core Policy 4 is monitored against the following indicators:

- Number of dwellings completed district wide
- Net number of dwellings current with permission
- Number of dwellings allocated through the Part 2 Plan and NDPs

3.30. There have been 11,435 housing completions since the start of the plan period, with a forecast delivery of 5,576 homes on deliverable housing sites in the next five years. Furthermore, the council has adopted its Local Plan Part 2, which made allocations for 2,420 homes. Overall, the council's performance against its housing indicators has been strong.

3.31. The council does not expect a reduction in the housing requirement in line with the standard method to affect the overall supply of housing. This is because the council has already committed to delivering this level of growth through allocations in the development plan and through granting planning permissions. Therefore, the change in housing requirement is unlikely to affect the total supply of new homes.

Reason five: The lack of impact to higher tier plans

3.32. There are no higher tier plans above LPP1. LPP2 sits alongside LPP1 as part of the development plan, and is considered in more detail in the point below.

Reason six: Lack of impact on plan-making activity by other authorities

3.33. The Vale of White Horse District Council has agreed to take on unmet from Oxford City Council, which was planned for in Local Plan Part 2 Core Policy 4a. Local Plan Part 2 is less than 5 years old so Core Policy 4a is not subject to this local plan review.

3.34. Therefore, it is necessary to make an adjustment to the local housing need to add the 183 dwellings per annum set out in Core Policy 4a to accommodate Oxford's unmet need. Such an adjustment is not directly covered by advice in the NPPF, PPG or the Housing Delivery Test Measurement Rule Book (CD3.12), but the additional requirement in Core Policy 4a is less than 5 years

old. There is nothing to indicate that the unmet need it addresses have fallen away. Indeed, the examination and adoption of the Oxford Local Plan in 2020 indicated this unmet need still existed.

- 3.35. Site allocations and planning permissions are in place to address the unmet need from Oxford, as set out in Core Policy 4a of Local Plan Part 2. The presence of an agreement on unmet need is not material to this assessment of CP4 because that unmet need is secured separately in CP4a and is unaffected by this review.

Reason seven: Significant economic changes that may impact on viability

- 3.36. Since the adoption of the plan in 2016, the UK has been affected by the impacts of both Brexit and the Covid-19 pandemic. The council is not aware of any specific viability challenges to development in the area, and none were revealed in the viability testing of the new Vale Community Infrastructure Levy Charging Schedule (CD1.7) during the summer of 2021, although housing delivery did slow in 2020 when both the Brexit transition period ended, and the pandemic restrictions were extensive.
- 3.37. Notwithstanding the direct impact on the construction and housing markets, these downturns in the economy are likely to affect wider economic performance in the Vale of White Horse. This could further dampen demand for housing in the area if job growth slows, as the housing target in Core Policy 4 is based on delivering committed economic growth (Oxfordshire SHMA, CD 3.4, Paragraph 9.61).
- 3.38. Given the significant changes in economic circumstances since the SHMA was published in 2014, it is appropriate to conclude that the relationship between job growth and housing requirement needs to be reassessed. This is a matter that the new Joint Local Plan will need to explore in identifying a new, up to date housing requirement for the district. In the meantime, it is not appropriate to rely on Core Policy 4's housing requirement that is based on dated employment growth forecasts.

Reason eight: New social, environmental, or economic priorities

- 3.39. Since the adoption of the plan the council has declared a Climate Emergency (February 2019) (**Appendix 3**). The council has also published a new Corporate Plan (2020- 24) committing the council to being carbon neutral in its own operations by 2030, and to be a carbon neutral district by 2045
- 3.40. The Vale of White Horse District Council signed the Oxfordshire Housing and Growth Deal (2018). This deal provides funding to the Oxfordshire authorities to deliver infrastructure that supports accelerated housing growth. In the Vale of White Horse, the Growth Deal funding is helping to deliver the following infrastructure projects:
- Frilford and Marcham bypass
 - Relief to Rowstock
 - Milton Enterprise Pedestrian and Cycle Bridge
 - Faringdon Community College
 - Wantage Eastern Link Road
 - Jubilee Way Roundabout and Didcot Central Corridor
- 3.41. Collectively, these infrastructure schemes are currently forecasted to help accelerate around 1,900 homes in the Vale of White Horse between 1 April 2018 and 31 March 2025. The Growth Deal does not “unlock” housing, i.e., make these sites acceptable in principle, but rather seeks to accelerate housing delivery from later in the plan period to 2025. The housing growth supported by Growth Deal funding is still supported by the local planning authority, and permissions and allocations will remain within the land supply and spatial strategy to deliver this. All the housing sites associated with these infrastructure schemes have planning permission or are under construction. Switching to the local housing need figure for monitoring purposes does not mean the council withdrawing its support for the Growth Deal or the agreed housing delivery.
- 3.42. The council’s Local Plans Part 1 and Part 2 both contain the supply required to meet the Growth Deal in full, i.e., the Vale’s agreed share of the 100,000 homes.

- 3.43. The Housing and Growth Deal is subject to its own independent monitoring process, with a dedicated team in place to ensure that planning permissions and completions countywide align with the Deal's expectations. This process has been in place since 2018 when the Deal was signed.
- 3.44. At the time of the Regulation 10a review, the council was located within the Oxford to Cambridge arc. Government has since withdrawn support for this project.

Regulation 10a review Summary:

- 3.45. A year has now passed since this review and many of the factors justifying a reduction in the housing need remain the same or have worsened. The council's position was justified in December 2021 when it prepared this review, and the events of 2022 have reinforced the council's assessment that Core Policy 4 requires updating.
- 3.46. Collectively, the evidence therefore continues to demonstrate that the housing requirement in Core Policy 4 requires updating. The passing of 2022 has reinforced the council's decision, showing further downward pressures on the development industry and finance sector. The year has also presented further questions on the future of the Oxfordshire Growth Deal, further diminishing the weight to give to this in identifying a housing requirement.

4. THE STATUS OF CORE POLICY 4A

- 4.1. In December 2019 the council adopted its LPP2 which, amongst other policies, added 183 DPA to the housing requirement from LPP1 between 2019 and 2031 to help address Oxford's unmet need.
- 4.2. Notwithstanding the detailed review of Core Policy 4, the Appellant argues that Core Policy 4a of LPP2 sets out a housing requirement of 1,211⁶. Their argument is that Core Policy 4a essentially replaces Core Policy 4 with a new total requirement for the whole plan period, they conclude at Paragraph 6.20 of the statement of case three reasons:
- *“Paragraph 2.7 of LPP2 states “The Vale of White Horse housing requirement, on adoption of the Vale of White Horse Local Plan 2031: Part 2, or two years after adoption of Local Plan 2031: Part 1, whichever is sooner, will be at least 22,760 homes.*
 - *Footnote 18 of LPP2 states “The Local Plan 2031: Part 1 was adopted 14/12/2016: on this basis the Vale housing requirement of 22,760 will apply on 14/12/2018, or when the Local Plan 2031: Part 2 is adopted, whichever is sooner. The final housing requirement for the Vale of White Horse, taking into account unmet housing need for Oxford, will ultimately be determined through the plan making process, as set out in Core Policy 2”;*
 - *Core Policy 4a states “The housing target for the Vale of White Horse is for at least 22,760 homes to be delivered in the plan period between 2011 and 2031.” That is different to the requirement expressed in Core Policy 4.”*
- 4.3. The Appellant's understanding of the relationship between Core Policy 4 and Core Policy 4a is incorrect as I explain below.
- 4.4. It is clear LPP1 only sought to quantify a housing requirement that would meet the needs for the council's own area, but it recognised that there were (at that time unquantified) unmet needs from Oxford that would need to be met within

⁶ Appellant's Statement of Case, Paragraphs 6.17 to 6.23

the council's area, via the mechanism set out in Core Policy 2. Core policy 4 was explicit that it was setting a minimum requirement to meet the needs of the council's area, and that Core Policy 2 was to be used to address any unmet needs from elsewhere:

“4.10 The Local Plan 2031 Part 1 makes provision for 20,560 new homes to be delivered during the plan period (2011/12 to 2030/31; Core Policy 4). This reflects the Objectively Assessed Need for Vale of White Horse District Council as identified by the up-to-date Strategic Housing Market Assessment (SHMA) for Oxfordshire.

4.11 If or when required, any needs arising elsewhere in the Housing Market Area, will be addressed by timely and effective cooperative working in accordance with Core Policy 2 (see Chapter 1).”

- 4.5. In both Core Policy 2 and Core Policy 4 the figure of 20,560 dwellings was identified as the amount of housing required to meet the district's own needs.
- 4.6. Whilst Core Policy 4a of LPP2 sets out the higher figure of 22,760 dwellings, that part of the policy must be read in the context of what precedes it in the same policy. Policy 4a starts by stating that *“The strategy for meeting the housing target for the Vale of White Horse is set out within Core Policy 4: Meeting our Housing Needs (Local Plan 2031: Part 1).”* The housing target there being referred to is the target set by Core Policy 4, because Core Policy 4 does not seek to set out a strategy for meeting the higher need once unmet needs from elsewhere are considered. As it explains in footnote (a), that was to be done via the cooperative working under Core Policy 2, which itself envisaged the preparation of LPP2 to address those (as unquantified) unmet needs. Core Policy 4a of LPP2 then explains that:

“This policy [i.e., Core Policy 4a itself] sets out how the Council will address housing needs arising from elsewhere in the Housing Market Area, expressly the quantum of unmet housing need for Oxford City to be addressed within Vale of White Horse of 2,200 homes.”

4.7. The purpose of Core Policy 4a of LPP2 therefore was to identify the additional housing requirement to meet the unmet needs from Oxford and to combine that with the housing requirement already set by LPP1 to meet the district's own needs. Arithmetically, when 2,200 is added to 20,560 it produces a figure of 22,760, which is why that figure is then stated in Core Policy 4a to be "*The housing target for the Vale of White Horse.*" That figure is to be understood as a composite target combining the 20,560 set by Core Policy 4 of LPP1 with the extra 2,200 set by Core Policy 4a of LLP2. The fact that the composite target is then expressed as a single figure of 22,760 in Core Policy 4a does not mean that it replaces the Local Plan Part 1 target within Core Policy 4 for the council's area. It is simply repeating that target and supplementing it with an additional requirement to meet a separate need for Oxford.

4.8. That understanding of the way that Core Policy 4a of Local Plan Part 2 works is confirmed by the introductory text in Chapter 2, which states:

"The Part 1 plan allocates strategic development sites to fully meet the Vale's own housing requirement up to 2031 (20,560 homes). This chapter sets out the additional housing allocations needed to ensure the agreed quantum of unmet housing or Oxford to be addressed within the Vale is also fully met. This requirement, as agreed by the Oxfordshire Growth Board, is for 2,200 homes to be delivered within the same period up to 2031, subject to the plan-making process."

4.9. The continued applicability and relevance of the housing requirement in Core Policy 4 of LPP1 is also confirmed by the regulatory regime for the production of development plans⁷. This provides (so far as relevant):

"(4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan.

(5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy."

⁷ Regulation 8 of the Local Planning (England) Regulations 2012 (SI 2012/767)

- 4.10. If Core Policy 4a of LPP2 had intended to replace Core Policy 4 of LPP1 by establishing a new housing requirement that was to supersede it, then Core Policy 4a would have needed (as required by Regulation 8(5)) to explicitly state that fact and identify Core Policy 4 as the superseded policy. Core Policy 4a of LPP2 does not do so. Instead, it supplements Core Policy 4 of LPP1 by adding the additional requirement to meet Oxford's unmet needs, precisely as envisaged by both Core Policy 2 and Core Policy 4 of LPP1. In that way, the position set out in Core Policy 4a of LPP2 was consistent with the adopted LPP1.
- 4.11. It is correct that Core Policy 4a of Local Plan Part 2 does refer to its table showing "*the contribution of all sources of supply*" as a table "*which supersedes the table set out in Core Policy 4*" but this is not stating that Core Policy 4 itself is being superseded by Core Policy 4a. The purpose of the table is to show the available supply rather than to identify the requirement figure, which is already described in the preceding text. The requirement figure's inclusion in the table is simply repetition of policy text. Clearly, as the new table shows, the position on the sources of supply has moved on since the table in Core Policy 4 was prepared. The solitary reference to the superseding of a table within a policy does not satisfy Regulation 8(5) LPER 2012 and result in Core Policy 4 of LPP1 being superseded by Core Policy 4a. All that has been superseded (or updated) is the table itself. The LPP2 Inspector was explicit at in his report (CD1.4 paragraph 20) that:

"Importantly, the LPP2 is intended as a complementary plan to the LPP1 which was adopted in December 2016 and will remain in force. The LPP2 must therefore be consistent with the LPP1 to comply with Regulation 8(4) of the 2012 Regulations. With one exception, the LPP1 establishes the overall spatial strategy and strategic policies to deliver sustainable development across the district up to 2031 and sets the context for LPP2. The exception is that the LPP1 did not establish any strategy for meeting the unmet housing needs of Oxford City in the district, leaving this matter for resolution in the LPP2."

- 4.12. The Inspector clearly understood and relied on the regulatory context and the limited role of LPP2 when he addressed the housing requirement. He was clear at paragraph 23 that it was LPP1 which had set the housing need at 20,560 in Core Policy 4 and that “*there is no remit in LPP2 to revisit the matter*”. The Inspector was not saying simply that he could not revisit the need figure. By framing his remarks with specific reference to Core Policy 4 (which sets out the housing requirement or target) he was explaining that the requirement set by LPP1 was not a matter for review in LPP2. This is wholly consistent with his earlier remarks at paragraph 20. It is also apparent from his report that he did not review or revisit the appropriateness of that housing requirement or test whether it remained up to date.
- 4.13. Consequently, it is not correct to regard Core Policy 4a as replacing or superseding Core Policy 4 as the Appellant does at Paragraph 6.20 of their statement of case.

5. THE HOUSING SUPPLY RING FENCE (CORE POLICY 5)

- 5.1. Core Policy 5 is based on delivering a percentage of housing growth in the Science Vale area. As I have set out in Paragraph 3.36 and 3.37 above, the overall housing target of Core Policy 4 is based on the delivery of committed economic growth, and it is no longer appropriate to rely on these economic forecasts for setting the housing requirement. Core Policy 5 seeks to deliver 58% of the housing requirement in Core Policy 4 within the sub area based on this forecast economic performance. Therefore, for the same reasons as Core Policy 4, Core Policy 5 is similar in need of updating.
- 5.2. Furthermore, Core Policy 5 is arithmetically linked with Core Policy 4, and therefore cannot function without it. It is therefore not appropriate to assign a percentage to the ring fence area as previously used.
- 5.3. However, if the policy were to remain in force, seeking the delivery of 11,850 homes in the Science Vale ringfence area, this would effectively result in the entirety of the district's own housing need (based on the standard method, but excluding the unmet need from Oxford) being delivered within this sub area⁸.
- 5.4. The council does not consider it appropriate to ringfence the same percentage of the standard method-based housing requirement as there is no mechanism for doing so through the NPPF or PPG. Furthermore, the ring-fence's strong connection to Core Policy 4 and underpinning evidence is fundamentally different from the standard method as I have set out in Section 3 above.
- 5.5. Notwithstanding this position, if the council monitored the ringfence based on the same percentage of the housing requirement being delivered in the Science Vale area, this would result in a 5 year requirement of 2,013 homes⁹. The council's November 2022 land supply statement does not identify the supply within the ringfence, but the council can confirm that the five-year supply from

⁸ Core Policy 5 is concerned with about 58% of the housing requirement set by Core Policy 4 ($11,850 / 20,560 \times 100 = 57.63\%$). The Standard Method derived annual housing need is about 62% of the annual housing requirement set by Core Policy 4 ($636/1,028 \times 100 = 61.86\%$).

⁹ Assuming 58% of the standard method figure (661 DPA) is assigned to the ringfence area, for five years with a 5% buffer. As per paragraph 31 of the PPG "Housing Supply and Delivery", no shortfall is added to the standard method as past under delivery is factored into Step 2 of the standard method.

sites within the ringfence as 2,255 dwellings. This would be a 5.6 year supply in the ringfence area, and differs from the Appellant's conclusion in Paragraph 6.35 (of 4.6 years) of their statement of case due to the Appellant using the June 2021 supply for their figure.

- 5.6. In conclusion, the council does not consider that Core Policy 5 is up to date due to its intrinsic arithmetical connection with Core Policy 4. If the policy were to be considered up to date, then it would create a scenario where almost all of the Vale of White Horse's own housing need would be met within Science Vale. Notwithstanding, the council can still demonstrate a 5.6-year supply within the ringfence area.

6. THE SUPPLY OF DELIVERABLE SITES

- 6.1. The Appellant has indicated through exchanges of the draft Housing Land Supply Statement of Common Ground which sites they consider are not deliverable in line with the council's trajectory.
- 6.2. As the Inspector requested at the Case Management Conference on 24 January 2023, I have focussed this proof on the key differences between the Appellant and the council.
- 6.3. For a full explanation of the council's methodology and approach to assessing a deliverable site, please see CD3.1 Chapter 4 (November 2022 Housing Land Supply Statement).
- 6.4. Each of the sites identified below has a corresponding pro-forma in the council's housing land supply statement which provides the full evidence supporting the council's assessment .

Land at Grove Airfield, Ref 1240

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
114	114	114	114	114	570

- 6.5. This site is a strategic allocation in the Vale of White Horse Local Plan 2031. The site has an outline permission for 2500 dwellings, with detailed permission granted for 786 dwellings, of which 457 dwellings have been delivered. This leaves 329 dwellings that have detailed permission and remain to be built. The site has been delivering dwellings since 2018/19, which is 4 years. The site-specific delivery average to date equates to 114 dwellings per annum, lower than the district wide average of 168 annum. Relying on the site-specific average there is 2.9 years of supply with detailed permission, or around April 2025 before supply from the outline permission would need to contribute.

- 6.6. The reserved matters references and permission dates are as follows:
- i. P17/V2753/RM – 191 dwellings - 17 April 2018
 - ii. P18/V1485/RM – 119 dwellings - 08 June 2020
 - iii. P18/V0399/RM – 55 dwellings - 07 August 2018
 - iv. P19/V2105/RM – 23 dwellings - 21 September 2020
 - v. P20/V2994/RM – 169 dwellings - 30 July 2021
 - vi. P19/V2567/RM – 33 dwellings - 24 November 2020
 - vii. P22/V0086/RM – 196 dwellings – 8 December 2022
- 6.7. As of 31 March 2022, 457 dwellings had been completed. This leaves 329 units with detailed permission remaining to be built.
- 6.8. Currently submitted is an infrastructure reserved matters application for the next phase of infrastructure including highways and drainage to facilitate future residential reserved matters parcels (ref. P21/V1841/RM), officers await amendments to highways and bridleway alignment, expected to be received within the next month. The developer has provided comments to indicate that the issues relating to Drainage, Landscape and Transport have now been resolved.
- 6.9. Furthermore, following the publication of the five year land supply statement, the developers have responded to the council's proforma request (**Appendix 4**), advising:
- “We will be submitting reserved matters applications for a number of the obligations within the S106 in the coming months including the first phase of allotments, football pitches and a NEAP and MUGA. Further reserved matters in relation to residential development will be forthcoming in the next 6 months.”*
- 6.10. Furthermore they advised that they support the council's forecast of 114 dwellings to be completed each year.
- 6.11. This is clear evidence that further residential reserved matters proposals will be forthcoming and that significant progress is being made on the site, with

housing delivery expected in accordance with the council's proposed housing trajectory.

Land West of Great Western Park (Valley Park): Ref 41

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
0	0	28	72	88	188

- 6.12. The site benefits from outline planning permission for 4,254 units. The council granted this consent on 21 February 2022, and the site is under the control of experienced house builders – Taylor Wimpey and Persimmon Homes. The applicants quickly submitted reserved matters applications on 1 March 2022 (P22/V0539/RM Taylor Wimpey Phase 1), 7 March 2022 (P22/V0604/RM enabling infrastructure) and 7 April 2022 (P22/V0907/RM Persimmon Phase 2). This is a period of 5 working days for the first RM application for houses, and 29 working days for the second. There is therefore clear progress from the developers, and their quick submission of reserved matters following the outline consent demonstrates an appetite to begin development shortly.
- 6.13. A strategic design code has now been agreed¹⁰ (22 November 2022), which was envisaged by the November 2022 land supply statement. This new design code will allow Taylor Wimpey and Persimmon will be able to amend their Phase 1 plans which they submitted for consideration in 2022.
- 6.14. At the time of the November 2022 statement, Taylor Wimpey advised they intend to resubmit their phased 1 reserved matters application by the end of 2022. They did so in November 2022¹¹.
- 6.15. Persimmon advised they intend to resubmit reserved matters applications for phase 1 in November / December 2022. This deadline has passed and Persimmon has not yet submitted a revised application, although council officers held positive meetings with them before Christmas 2022. The

¹⁰ P22/V2066/DIS

¹¹ P22/V0539/RM

discharging of the strategic design code condition will allow these plans to be determined quickly, and the applicant is preparing the reserved matters application in accordance with these. The council expects to grant consent for this revised reserved matters application by the end of April 2023.

- 6.16. Overall , clear progress is being made and there is clear evidence that it is realistic to assume homes being delivered in the 5 year period. There is a clear commitment from the applicants to bring forward their reserved matters, as demonstrated through the discharge of the strategic design code in November 2022, the submission of Taylor Wimpey’s plans in the same month, and the ongoing discussions with Persimmon.

East of Kingston Bagpuize with Southmoor: Ref 1270

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
0	0	0	55	110	165

- 6.17. The latest hybrid application, P22/V0248/O, is recommended for approval and will be considered by the planning committee on the 14 Feb 2023.
- 6.18. The Appellant referenced an objection from the Environment Agency in relation to discharge loading at Kingston Bagpuize Sewage Treatment Works. However, in response to the Environment Agency objection, Thames Water confirm that there is a Water Industry National Environmental Programme scheme currently underway to upgrade Kinston Bagpuize sewage treatment works. This will accommodate future growth and address discharge issues to the brook. The deadline for the scheme to be completed in December 2024. The EA objection is therefore overcome.
- 6.19. The trajectory for this site is informed by the Transport Assessment accompanying the application. This reflects a slower build out rate than the council originally assumed before sharing its assessment with the site

promoter. This developer trajectory identifies the first homes being completed in 2024/25, with 55 homes in the first year increasing to 110 homes in subsequent years.

- 6.20. As this information provides a lower build out rate than the average, the council used this to inform the delivery trajectory to be cautious, whilst maintaining the start year of 2025/26, a year after the site promoter has indicated, in accordance with the district wide lead in time averages for sites of this size.
- 6.21. There has been clear progress on this site with the resolution of EA objection, and it will be going to planning committee in Feb 2023 with an officer recommendation for approval. It is realistic to assume delivery in the 5-year period.
- 6.22. Therefore, we consider that this site does meet the definition of deliverable as set out in national policy and guidance and is included in the 5-year supply. We have taken into account the site promoter's comments and evidence, which expects homes to be delivered in advance of the council's final trajectory, and where this information indicates lower build out rates than that of our district wide averages for sites of this size, we have used the lower figure. This has created a pessimistic, albeit realistic trajectory for the site.

South East Marcham: Ref 1272

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
0	0	0	0	12	12

- 6.23. The site recently received outline planning permission in April 2022. The site promoter who secured the outline consent, Catesby Estates, is not a developer. However, following the grant of outline consent, Catesby Estates marketed the site and sold it to Bloor Homes.

- 6.24. Bloor Homes did not respond to the council's requests to review the November 2022 proforma, and at the time had not been able to confirm key dates in the process (such as their expected submission of reserved matters etc.). However, since this date, Bloor Homes has sought pre-application advice for the site, indicating they are progressing towards an application.
- 6.25. There are no "in principle" constraints to the development, and the council would expect that a reserved matters application can be determined in line with the average for a site of this size in the Vale of White Horse. This would place the determination 8 months following the submission of the reserved matters application.
- 6.26. The developer has since indicated that they will submit a planning application early in the year 2023/24.
- 6.27. The council's original assessment conservatively assumed that this submission would have been on the latest possible date as set by condition on the outline permission – within 3 years of consent, or 1 April 2025. The latest evidence would therefore suggest the site is some 2 years ahead of what the council originally forecasted.
- 6.28. The council's original assessment assumed that following reserved matters consent, on average, it takes 17 months for sites of this size to move from outline consent to first completions. This would have placed first completions in August 2027. The average build out rate for a site of this size is 35 dwellings per annum, and we would assume half this figure would be achieved in the first year of development. This equates to a monthly rate of 1.5 dwellings ($35 \div 2 \div 12$). After the first year of delivery, the site would continue to deliver the average annual rate of 35 per annum. This assessment would result in 8 months of delivery within the five year period, or 12 dwellings. This figure is reflected in the council's current land supply position.
- 6.29. However, given that a developer has indicated they will submit a reserved matters application early in 2023/24 actual delivery on site is likely to be higher

than assumed by the council. A two year acceleration in the trajectory would result in a further 70 units in the 5 year period.

Monks Farm: Ref 24

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
0	6	68	68	68	210

- 6.30. The council granted reserved matters consent for David Wilson Homes' live application for 83 homes in September 2022. On average, it takes 17 months from the granting of consent to first completions of sites of this size. This would place first completions on this phase in February 2024.
- 6.31. Before consulting with DWH, the council considered that the site would deliver in line with the average for sites of that size (50-99 dwellings). This would deliver 35 dwellings per annum on average. We had assumed half this rate in the first year of completions. However, DWH has confirmed that two outlets will operate on this site: one under the DWH brand, and one under the Barratt Homes Brand. For the total site size of 400 dwellings, the council would expect an average of 44 dwellings per annum. For this site then, the data suggests an annual average build out rate of between 35 and 102 dwellings per annum, or a midpoint of 68 dwellings. This is slightly higher than the council's average, and slightly lower than DWH's estimates.
- 6.32. DWH notes that their trajectories are dependent on the approval of the Phase 1a Bridge application P22/V1031/RM. The council expected to grant this permission by the end of 2022 but this has not yet happened.
- 6.33. Given the recent consent of reserved matters for phase 1, the council do not expect the reserved matters for the remaining phases to be submitted yet. However, DWH has sought pre-application advice on Phase 2, with an expected submission in "early 2023". The council has assumed a submission

date of April 2023 (a conservative interpretation of “early 2023”). And have then assumed an average annual build out rate of 68 dwellings across the whole site as explained above.

- 6.34. DWH’s trajectory indicated that Phase 3 would see first completions in 2026/27. This is based on their projected submission of an RM application for this phase in early 2024. The council has pushed this back to ensure that the whole site’s trajectory does not exceed 68 dwellings per annum, while phase 2 is still delivering homes.
- 6.35. Taking the above into account, the council considers that the site is deliverable. The tables below show our original trajectory for the site, DWH trajectory, and our final trajectory based on this feedback. The council’s original trajectory for this site only included phase 1, as we did not feel that it was appropriate to include later phases until DWH shared information on their progress toward securing consent on these.

North of Abingdon on Thames: Ref 1255

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
44	66	88	88	88	374

- 6.36. The Taylor Wimpey parcel (P22/V0619/RM) application for 141 dwellings has now been withdrawn. I agree that these 132 units should now be withdrawn from the supply. This is reflected in the table above.
- 6.37. The Bellway application for 371 dwellings (P22/V0680/RM) has been the subject of amendments and further consultations some outstanding issues that need to be resolved. Bellway has submitted revised plans and the council will issue consent by 14 February 2023.

South of Park Road, Faringdon, Ref 1266

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
44	77	121	132	132	506

6.38. The Appellant notes that Bloor homes has advised that the site build out rate should be 26 homes per annum. The council has not seen evidence of this, and has applied an average build out rate of 44 dwellings per annum in line with the average build out rate for sites of this size.

Greenwood Way Site south of Housing along Orchid Mews: Ref 1362

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
44	44	44	44	44	220

6.39. The Appellant suggests that this is a residential institution and although it can therefore contribute towards land supply, PPG confirms that the contribution to supply should be based on the amount of accommodation released into the housing market.

6.40. This development consists of self contained apartments, not communal accommodation as you would see in a residential care home. Therefore the amount of market housing released into the housing market would be on a 1:1 basis.

Crab Hill, North East Wantage: Ref 1244

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
105	105	143	105	105	563

6.41. The Appellant argues that given current economic and housing market conditions, it is reasonable to expect there to be a reduction in completions in the next 12 months compared to previously expected delivery rates.

6.42. I do not agree. It is not reasonable to apply a reduction to this site. Clear progress has been made with the site's development and the latest RM for another 145 dwellings in under consideration with construction anticipated to start after Easter 2023. The build out rates for this site are informed by feedback from the master developer on site. The phasing program shows the developers' intention for build of the site and provides an indication of how the site will come forward.

North of Shrivenham: Ref 1227 and 1228

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
44	72	92	94	72	374

6.43. The Appellant references the council's Environmental Protection Officer comments asking for the noise assessment to be updated. The council expects to receive an amended noise report and associated amended plans for P21/V0773/RM imminently following discussion between District's Environmental health officer and applicant's noise consultant. Progress is being made and not expected to delay delivery.

Milton Heights: Ref 53

2022/23	2023/24	2024/25	2025/26	2026/27	5 Year total
44	44	44	44	44	220

- 6.44. The Appellant argues that given current economic and housing market conditions, it is reasonable to expect there to be a reduction in completions in the next 12 months compared to previously expected delivery rates.
- 6.45. The council has not seen evidence of this, and has applied an average build out rate of 44 dwellings per annum in line with the average build out rate for sites of this size.

Deliverable Supply summary

- 6.46. The council agrees that one site is not progressing as it had envisaged in November 2022 and has reduced its supply accordingly by 132 dwellings (North of Abingdon on Thames).
- 6.47. However, on other sites the Appellant has not provided sufficient evidence to demonstrate that the sites are not deliverable. The council's revised housing land supply as of January 2023 would be 5,444 homes. Against the housing requirement of 4,431 homes this would equate to a 6.14 year housing land supply.

7. SUMMARY AND CONCLUSION (To be read as my Summary Proof)

- 7.1. My evidence supports the Vale of White Horse District Council's (the council) five-year supply of deliverable housing sites. The council's position is set out in its Housing Land Supply Statement (published in November 2022) (CD3.1) (the land supply statement).
- 7.2. The council's land supply statement demonstrates a land supply of 6.29 years. This follows the council's Regulation 10a (CD1.5) review that it prepared, published and adopted without legal challenge in December 2021. I have confirmed above that with an appropriate reduction for the north of Abingdon on Thames site (ref 1255), the supply would reduce to 6.14 years.
- 7.3. The evidence of Stuart Walker who assesses the overall planning policy context and weight to be given to development plan policy and other material considerations in the planning balance, including the "tilted balance" if a shortfall is found by the Inspector.
- 7.4. My proof summarises the council's position on the housing requirement and our approach to the ring fence area in the context of the Regulation 10a review which the council undertook in 2021.
- 7.5. At the time of preparing my evidence, no further details has been provided in respect of the 12 specific sites the Appellant disputes can contribute towards our supply. As such, the council proposes to deal with any comments or evidence in rebuttal once the Appellant's reasons are known.
- 7.6. My evidence follows and responds to the Appellant's conclusions in respect of housing land supply as set out in their Statement of Case and as referenced in the council's Statement of Case.
- 7.7. The Appellant and the council disagree on several key matters that affect the ability of the council to demonstrate a sufficient housing land supply. These are as follows:

The conclusions of the Regulation 10a review

7.8. There is a clear justification for the council to use its local housing need calculated using the standard method for its housing requirement. Core Policy 4 is now more than 5 years old and has been found to need updating. The council's justifications for this are:

- That the local housing need has changed significantly
- There is diminishing market demand and capacity to deliver the requirement
- The council has performed strongly against the housing delivery test
- The authority monitoring reports good performance
- There is a lack of impact on higher tier plans
- There is a lack of impact on plan making activity by other authorities
- There are significant economic changes that may impact on viability
- There are new social, environmental and economic priorities

7.9. The council's review of Core Policy 4 has been further justified by worsening economic circumstances in 2022.

The status and scope of Core Policy 4a

7.10. The council agrees with the Appellant that Core Policy 4a is less than 5 years old and has not therefore been subject to a Regulation 10a review. However, the Appellant is incorrect in their interpretation of Core Policy 4a as superseding Core Policy 4.

7.11. The purpose of Core Policy 4a of LPP2 was to identify the additional housing requirement to meet the unmet needs from Oxford and to combine that with the housing requirement already set by LPP1 to meet the district's own needs

7.12. If Core Policy 4a of LPP2 had intended to replace Core Policy 4 of LPP1 by establishing a new housing requirement that was to supersede it, then Core Policy 4a would have needed (as required by Regulation 8(5)) to explicitly state that fact and identify Core Policy 4 as the superseded policy. Core Policy 4a of LPP2 does not do so. Instead, it supplements Core Policy 4 of LPP1 by adding the additional requirement to meet Oxford's unmet needs, precisely as envisaged by both Core Policy 2 and Core Policy 4 of LPP1.

7.13. This is entirely consistent with the LPP2 Inspector's report (CD1.4 paragraph 20):

"Importantly, the LPP2 is intended as a complementary plan to the LPP1 which was adopted in December 2016 and will remain in force. The LPP2 must therefore be consistent with the LPP1 to comply with Regulation 8(4) of the 2012 Regulations. With one exception, the LPP1 establishes the overall spatial strategy and strategic policies to deliver sustainable development across the district up to 2031 and sets the context for LPP2. The exception is that the LPP1 did not establish any strategy for meeting the unmet housing needs of Oxford City in the district, leaving this matter for resolution in the LPP2."

7.14. Consequently, it is not correct to regard Core Policy 4a as replacing or superseding Core Policy 4 as the Appellant does at Paragraph 6.20 of their statement of case.

The status of Core Policy 5

7.15. Core Policy 5 is based on delivering a percentage of housing growth in the Science Vale area. As I have set out in Paragraph 3.36 and 3.37 above, the overall housing target of Core Policy 4 is based on the delivery of committed economic growth, and it is no longer appropriate to rely on these economic forecasts for setting the housing requirement. Core Policy 5 seeks to deliver 58% of the housing requirement in Core Policy 4 within the sub area based on this forecast economic performance. Therefore, for the same reasons as Core Policy 4, Core Policy 5 is similar in need of updating.

- 7.16. Furthermore, Core Policy 5 is arithmetically linked with Core Policy 4, and therefore cannot function without it. It is therefore not appropriate to assign a percentage to the ring fence area as previously used.
- 7.17. Notwithstanding this position, if the council monitored the ringfence based on the same percentage of the housing requirement being delivered in the Science Vale area, this would result in a 5.6 year supply in the ringfence area.

Housing requirement summary

- 7.18. The appropriate housing requirement to use for the purposes of determining whether the council can demonstrate a five year housing land supply is 844 dwellings per annum. This is the composite of the standard method figure of 661 dwellings per annum, and the 183 dwellings per annum identified by Core Policy 4a.

Housing supply

- 7.19. The council has set out its clear methodology for assessing the deliverability of sites in its November 2022 Housing Land Supply Statement (CD3.1 Chapter 4). This approach represents a detailed and comprehensive assessment of the deliverability of sites.
- 7.20. Where the NPPF directs that the council requires clear evidence to support a site's inclusion in the supply (Category B sites), these are provided in extensive proformas covering evidence recommended by the PPF relating to current: planning status, site promoter's progress with other site assessment work, site viability, ownership constraints, and infrastructure dependencies and enablers. These are then shared with site promoters to seek their feedback, before informing a final officer judgment based on the comprehensive evidence in the pro-forma.
- 7.21. Having reviewed the Appellant's list of challenged sites, I only agree that one site should be reduced in the supply (North of Abingdon on Thames: Ref 1255) by 132 dwellings.

7.22. This results in a revised housing land supply of 5,444 homes. Against the housing requirement of 4,431 homes this would equate to a **6.14 year** housing land supply.