

Proof of Evidence of Ben Pycroft re: Housing Land Supply

For Countryside Partnerships (Eastern Home Counties) | 24-383

Construction of 173 no. dwellings including public open space, landscaping, access, drainage, parking, servicing, utilities and all associated infrastructure and ancillary buildings at land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex

LPA ref: 22/0484/FUL, PINS ref: APP/M1520/W/24/3351658

Project: 24-383
Site Address: Land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex
Client: Countryside Partnerships (Eastern Home Counties)
Date: 20 December 2024
Author: Ben Pycroft

Contents

1.	Introduction and summary	1
2.	Planning policy context	7
3.	What constitutes a deliverable site?	10
4.	Agreed matters re: 5YHLS	25
5.	Matters not agreed re: 5YHLS - the extent of the deliverable 5YHLS	27
6.	Conclusions in relation to 5YHLS	31
7.	Appendices	32



1. Introduction and summary

- 1.1 This proof of evidence is submitted on behalf of Countryside Partnerships (Eastern Home Counties) (i.e. “the Appellant”) in support of its appeal against the decision of Castle Point Borough Council to refuse to grant planning permission to:

“Construct 173No. dwellings including public open space, landscaping, access, drainage, parking, servicing, utilities and all associated infrastructure and ancillary buildings”.

at Land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex (LPA ref: 22/0484/FUL, PINS ref: APP/M1520/W/24/3351658).

- 1.2 This proof of evidence addresses matters relating to the Council’s five year housing land supply (5YHLS). It should be read alongside the proofs of evidence of Annie Gingell, which addresses affordable housing and Matthew Wood, which addresses all other planning matters in relation to this case.

Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am a Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have extensive experience in dealing with housing supply matters and have prepared and presented evidence relating to five year housing land supply calculations at several Local Plan examinations and over 70 public inquiries across the country.
- 1.5 I understand my duty to the inquiry and have complied, and will continue to comply, with that duty. I confirm that this evidence identifies all facts which I regard as being relevant to the opinion that I have expressed, and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion. I believe that the facts stated within this proof are true and that the opinions expressed are correct and comprise my true professional opinions which are expressed irrespective of by whom I am instructed.
- 1.6 I provide this proof of evidence, a summary proof of evidence and a set of appendices. I also refer to several core documents and the Statement of Common Ground in relation to housing land supply.



Relevant background

Revised National Planning Policy Framework and the standard method for calculating Local Housing Need

- 1.7 On 12th December 2024, the Government updated the National Planning Policy Framework (the Framework) and adopted a new standard method for calculating Local Housing Need.
- 1.8 The outcome of these changes means that Castle Point cannot demonstrate a 5YHLS at 1st April 2024 by a very significant margin even on its own supply figure. The Council considers the deliverable supply at 1st April 2024 is 1,143 dwellings. Against the revised standard method figure of 701 dwellings per annum and a 20% buffer, this equates to just 1.36 years (a shortfall against the 5YHLS including a 20% buffer of 3,063 dwellings). My supply figure of 463 dwellings equates to 0.55 years and a shortfall in the 5YHLS of 3,491 dwellings.

The Council's latest position on 5YHLS

- 1.9 At the time the appeal application was determined in March 2024, the Council considered that it could demonstrate a 2.31 year supply¹.
- 1.10 In August 2024, a decision relating to an appeal made by This Land Development Limited against the decision of the Council to refuse to grant outline planning permission for a mixed use development including up to 455 dwellings at land east of Rayleigh Road, Thundersley was issued². In that decision, Inspector Dawe explained that the Council could demonstrate a 1.86 year supply (paragraph 44, page 10). This was an agreed position between the Council and the Appellant for that appeal and was the Council's published position as set out in the Authority Monitoring Report (AMR) April 2021 – March 2022³.
- 1.11 The Council has since published its AMR April 2022 – March 2024⁴. The AMR claims that at 1st April 2024, the Council has a deliverable supply of 1,143 dwellings from the following sources⁵:
- 573 dwellings on 7 Strategic Site Allocations;
 - 494 dwellings on sites with extant planning permission as listed in Appendix 4 of the AMR;
 - 36 dwellings on sites listed as "SHLAA Policy Compliant and expired consents";

¹ Core document **3.2** – page 22

² PINS ref: 3338797 – 22nd August 2024 – core document **8.2**

³ Core document **7.8** – Figure 9, page 13

⁴ Core document **7.29**

⁵ Core document **7.29** – Housing Trajectory at April 2024 - page 11



- 100 dwellings on the net Brownfield register sites;
- 180 dwellings on windfall sites; and
- Minus 240 dwellings on losses on strategic sites (i.e. land at Thorney Bay).

1.12 As above, against the revised standard method and a 20% buffer, the Council's supply figure equates to 1.36 years. The Council's 5YHLS has significantly decreased since the appeal application was determined.

1.13 On 21st November 2024, I wrote to the Council to request information relating to the Council's published position as set out in the AMR⁶. I received a response on 12th December 2024⁷. However, this did not provide the information I requested, including:

- The clear evidence required to support the inclusion of category b) sites in the 5YHLS i.e. the Strategic Allocations referred to above;
- The specific SHLAA and Brownfield Register sites the Council relies on to include 36 and 100 dwellings respectively in the 5YHLS; or
- The list of specific sites with extant planning permission the Council relies on to include 494 dwellings in the 5YHLS referred to above.

1.14 My assessment of the Council's 5YHLS is therefore based on the evidence as set out in the AMR.

Summary

1.15 The Council accepts that it cannot demonstrate a 5YHLS as it is required to by paragraph 77 and footnote 42 of the Framework. As above, the Council's latest position is that it has a deliverable supply at 1st April 2024 of 1,143 dwellings, which against a local housing need of 701 dwellings and a 20% buffer equates to **1.36 years** (a shortfall against the 5YHLS including a 20% buffer of 3,063 dwellings).

1.16 The following matters in relation to 5YHLS are agreed:

- The relevant base date for assessing the 5YHLS the purpose of this appeal is 1st April 2024 and the relevant 5YHLS period is to 31st March 2029;
- The 5YHLS should be measured against the local housing need calculated using the standard method set out in the Planning Practice Guidance (PPG). This is 701 dwellings per annum;
- The 20% buffer applies; and
- The Council cannot demonstrate a 5YHLS.

⁶ Appendix EP1

⁷ Appendix EP2



1.17 The extent of the deliverable supply is not agreed. As above, the Council considers that it can demonstrate a deliverable supply of 1,413 dwellings.

1.18 For the reasons set out in my proof of evidence and summarised below, I challenge the inclusion of the following sites in the Council's 5YHLS.

Table 1.1 – Disputed sites in the Council's 5YHLS at 1st April 2024

Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed	Summary reason for dispute
HO15	Land south of Scrub Lane	Pre-app	49	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO17	Hadleigh Island Site	Pre-app	40	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO22	Land at Thames Loose Leaf	Pre-app	12	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO25	Land at Thorney Bay	Proceeding under existing consents	120	The AMR does not list the consents or provide an explanation why 120 net dwellings should be included in the 5YHLS. I asked the Council to provide this information but this has not been provided.
HO28	Land at Admiral Jellicoe	8 completions	24	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS



Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed	Summary reason for dispute
	Extant planning permission at 1 st April 2024	Planning permission	119	Appendix 4 of the AMR lists 475 net dwellings, not 494 The Strategic allocations listed in the AMR are double counted in Appendix 4 and completions have not been removed from the figures. This means only 375 dwellings should be included from this source, not 494 – a reduction of 119 dwellings.
	SHLAA Policy Compliant & Expired Consents		36	The sites have not been identified and the Council has not provided clear evidence for their inclusion
	Brownfield Register		100	The sites have not been identified and the Council has not provided clear evidence for their inclusion
	Windfall allowance		180	The Council has not provided compelling evidence for a windfall allowance of 180 dwellings in addition to the windfall sites already included in the 5YHLS.
	Total		680	

1.19 I therefore conclude that the 5YHLS at 1st April 2024 is 463 dwellings (i.e. 1,143 – 680 = 463). Against the Local Housing Need and a 20% buffer, this equates to **0.55 years** as shown in the following table:



Table 1.2 – Castle Point's 5YHLS at 1st April 2024

		Council	Appellant
	Requirement		
A	Annual local housing need	701	
B	5YHLS requirement without buffer (A X 5 years)	3,505	
C	5YHLS requirement plus 20% buffer (B + 20%)	4,206	
D	Annual 5YHLS requirement plus 20% (C / 5)	841	
	Supply		
E	5YHLS at 1 st April 2024	1,143	463
F	Supply in years (E / D)	1.36	0.55
G	Surplus / shortfall in 5YHLS (E – C)	-3,063	-3,743

1.20 The policy implication of this is addressed by Matthew Wood.



2. Planning policy context

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (the Framework) is a material consideration. The Framework sets out what a 5YHLS is, how it should be calculated and the consequences of failing to demonstrate a 5YHLS.

Development plan context

- 2.2 The existing development plan comprises the saved policies of the Castle Point Local Plan (adopted November 1998 with policies saved beyond September 2007).
- 2.3 The conformity of the appeal proposals with the policies in the development plan, whether the most important policies for determining the appeal are up to date and the weight to be given to those policies are addressed by Matthew Wood.
- 2.4 Of relevance to my proof of evidence is the fact that there is no up to date saved strategic policy which contains a housing requirement. Therefore, in accordance with paragraph 78 and footnote 39 of the Framework, the 5YHLS should be calculated against the local housing need.

Other material considerations

Emerging development plan

- 2.5 The Council is preparing a new Local Plan. However, this is at a very early stage. An Issues and Options (Regulation 18) consultation took place in July 2024.

Castle Point Authority Monitoring Report (AMR) 1st April 2022 – 31st March 2024

- 2.6 The AMR sets out the Council's 5YHLS at 1st April 2024. As set out in the introduction to my proof of evidence, the published AMR claims that the deliverable 5YHLS is 1,143 dwellings, which against a local housing need figure of 355 dwellings per annum and a 20% buffer equates to 2.68 years. As I have set out above, the standard method for calculating local housing need has recently been updated. The Local Housing Need is now 710 dwellings per annum. Against this and a 20% buffer, the Council's deliverable supply equates to 1.36 years.



National Planning Policy Framework

2.7 The Framework was published in March 2012. It was revised in July 2018, February 2019, July 2021, September 2023, December 2023, and most recently on 12th December 2024.

2.8 The following sections of the revised Framework are relevant to my proof of evidence:

- Footnote 8 which explains that the tilted balance to the presumption in favour of sustainable development applies where a) a local planning authority cannot demonstrate a 5YHLS or b) where the Housing Delivery Test result is less than 75%;
- Section 5: Delivering a sufficient supply of homes, including:
 - Paragraph 61, which refers to the Government’s objective of significantly boosting the supply of homes;
 - Paragraph 62, which explains that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment calculated using the standard method set out in the PPG. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for;
 - Paragraph 75, in relation to an allowance for windfall sites;
 - Paragraph 78, which states:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies³⁸ or against their local housing need where the strategic policies are more than five years old³⁹. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

 - a) 5% to ensure choice and competition in the market for land; or
 - b) 20% where there has been significant under delivery⁴⁰ of housing over the previous three years, to improve the prospect of achieving the planned supply; or
 - c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework⁴¹, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.



- Footnote 39 states: “Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance”
- Footnote 40 states: “This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement”
- Paragraph 79, in relation to Housing Delivery Test Action Plans and the policy consequences for failing the HDT.
- Annex 1: Implementation, including:
 - Paragraph 232, which explains that where a local planning authority can demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78) and where the Housing Delivery Test indicates that the delivery of housing is more than 75% of the housing requirement over the previous three years, policies should not be regarded as out-of-date on the basis that the most up to date local housing need figure (calculated using the standard method set out in planning practice guidance) is greater than the housing requirement set out in adopted strategic policies, for a period of five years from the date of the plan’s adoption.
 - Paragraph 233, which sets out the circumstances in which an authority can confirm its housing land supply through an Annual Position Statement.
- Annex 2: Glossary, including:
 - The definition of “deliverable” on page 72; and
 - The definition of “windfall sites” on page 80.

Planning Practice Guidance (PPG)

2.9 The relevant chapters of the PPG in relation to my proof of evidence are:

- Chapter 2a - Housing and economic needs assessment;
- Chapter 3 – Housing and economic land availability assessments; and
- Chapter 68 – Housing supply and delivery.

2.10 Chapters 2a and 68 of the PPG were last updated on 12th December 2024 to reflect the revised Framework.



3. What constitutes a deliverable site?

Previous National Planning Policy (2012) and Guidance (2014)

3.1 Footnote 11 of the 2012 Framework stated:

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”

3.2 Paragraph 3-031 of the previous PPG (dated 6th March 2014): “What constitutes a ‘deliverable site’ in the context of housing policy?” stated:

“Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5 years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the 5-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (eg infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a 5-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust 5-year housing supply.”

3.3 Therefore, under the 2012 Framework, all sites with planning permission, regardless of their size or whether the planning permission was in outline or in full were to be considered deliverable until permission expired unless there was clear evidence that schemes would not be “implemented” within five years. The PPG went further by stating that allocated sites “could” be deliverable and even non-allocated sites without planning permission “can” be considered capable of being delivered.

3.4 The Government consulted on a draft revised Framework between March and May 2018. The draft revised Framework provided the following definition of “deliverable” in the glossary:



“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

3.5 Question 43 of the Government’s consultation on the draft revised Framework asked: “do you have any comments on the glossary?”

3.6 There were 750 responses to question 43 of the consultation. Some of the points raised included:

“Local authorities called for the proposed definition of ‘deliverable’ to be reconsidered, as it may result in them being unable to prove a five year land supply and place additional burdens on local authorities to produce evidence. Private sector organisations were supportive of the proposed definition.” (my emphasis)

3.7 The government’s response was as follows:

“The Government has considered whether the definition of ‘deliverable’ should be amended further, but having assessed the responses it has not made additional changes. This is because **the wording proposed in the consultation is considered to set appropriate and realistic expectations for when sites of different types are likely to come forward.**” (my emphasis)

Current National Planning Policy and Guidance

3.8 The definition of “deliverable” is set out on page 72 of the Framework (December 2024). For the avoidance of doubt, the definition has not substantially changed since 2018⁸. The definition states:

“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered

⁸ The July 2018 version of the Framework included the same wording but did not list the two categories of site as a) and b)



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).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

3.9 The relevant paragraph in the PPG was most recently updated in July 2019. Paragraph 68-007 of the PPG⁹ provides some examples of the types of evidence, which could be provided to support the inclusion of sites with outline planning permission for major development and allocated sites without planning permission. It states:

“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;
- are allocated in a development plan;
- have a grant of permission in principle; or
- are identified on a brownfield register.

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

⁹ Paragraph 007 Reference ID: 68-007-20190722: “What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking?”



Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.”

- 3.10 Whilst the previous definition in the 2012 Framework considered that all sites with planning permission should be considered deliverable, the revised definition in the 2023 Framework is clear that only sites with detailed consent for major development should be considered deliverable and those with outline planning permission should only be considered deliverable where there is clear evidence that housing completions will begin in five years.
- 3.11 As above, the PPG has been updated to provide some examples of the type of evidence which may be provided to be able to consider that sites with outline planning permission for major development, allocated sites and sites identified on a brownfield register are deliverable.

Castle Point’s approach to paragraph 78 of the Framework and “clear evidence”

- 3.12 As above, paragraph 78 of the Framework requires the Council to “identify” “specific deliverable sites”. However, the AMR does not identify:
- The specific SHLAA sites where the Council considers 36 dwellings are deliverable in the 5YHLS;
 - The specific Brownfield Register sites where the Council considers 100 dwellings are deliverable in the 5YHLS; or
 - The specific sites with planning permission, which are included in the 494 dwelling figure in the 5YHLS.
- 3.13 The AMR does not provide the “clear evidence” required for the following five sites which are identified as being “Strategic Site Allocations”:
- HO15 – Land south of Scrub Lane (49 dwellings in the 5YHLS);
 - HO17 – Hadleigh Island Site (40 dwellings in the 5YHLS);
 - HO22 – Land at Thames Loose Leaf (12 dwellings in the 5YHLS);
 - HO25 – Land at Thorney Bay (120 net dwellings in the 5YHLS); or
 - HO28 – Land at Admiral Jellicoe (24 dwellings).
- 3.14 In the absence of clear evidence of deliverability, these dwellings should be removed from the Council’s 5YHLS.



- 3.15 The onus is on the Council to provide clear evidence of deliverability for category b) sites. This was confirmed in a decision dated 28th September 2018 soon after the definition of “deliverable” was made relating to an appeal made by Landex Ltd against the decision of Mid Suffolk District Council to refuse to grant outline planning permission for up to 49 dwellings at land on east side of Green Road, Woolpit¹⁰. Paragraph 65 of the appeal decision states:

“The NPPF 2018 provides specific guidance in relation to the calculation of the five years supply but specifically with regard to qualifying sites, the Glossary definition of ‘Deliverable’ in Annex 2 goes further than its predecessor. Small sites and those with detailed permission should be considered deliverable until permission expires unless there is clear evidence that they will not be delivered. Sites with outline permission, or those sites that have been allocated, should only be considered deliverable where there is clear evidence that housing completions will begin on sites within five years. The onus is on the LPA to provide that clear evidence for outline planning permissions and allocated sites.” (my emphasis added)

- 3.16 Paragraph 68 of the same appeal decision states:

“Sites with outline planning permission make up a very large proportion of the Council’s claimed supply. The onus is on the Council to provide the clear evidence that each of these sites would start to provide housing completions within 5 years. I accept that there was clear evidence of what was necessary on one site provided in Mr Robert’s evidence and so the 200 dwellings in respect of that site should be added to the Appellant’s supply calculations. As for the other 1,244 dwellings with outline permission, the Council has not even come close to discharging the burden to provide the clear evidence that is needed for it to be able to rely upon those sites.” (my emphasis added)

- 3.17 However, I make the following general points with reference to relevant appeal decisions where the definition of “deliverable” and “clear evidence” have been considered.

Relevant appeal decisions

- 3.18 There have been several appeal decisions which have considered the definition of “deliverable” since it was first introduced in the 2018 version of the Framework and whether “clear evidence” has been provided for the inclusion of sites which only have outline planning permission for major development or are allocated without planning permission. Whilst each appeal has been determined on a case by case basis on the evidence before the decision-maker, several themes have arisen in appeal decisions, which I discuss below.

¹⁰ PINS ref: 3194926 – 28th September 2018 – core document 8.5



The absence of any written evidence

3.19 Where no evidence has been provided for the inclusion of category b) sites, the Secretary of State and Inspectors have concluded that these sites should be removed. For example:

- In an appeal decision regarding land off Audlem Road, Stapeley, Nantwich and land off Peter De Stapeleigh Way, Nantwich¹¹, the Secretary of State removed 301 dwellings from Cheshire East Council's supply from sites including: *"sites with outline planning permission which had no reserved matters applications and no evidence of a written agreement"* (paragraph 21 of the decision letter dated 15th July 2020);
- In an appeal decision regarding land to the south of Cox Green Road, Surrey¹² an Inspector removed 563 dwellings on 24 sites from Waverley Council's supply because the Council had not provided any evidence for their inclusion (paragraphs 22 to 24 of the appeal decision dated 16th September 2019);
- In an appeal decision regarding land at Station Road, Stalbridge, North Dorset¹³ an Inspector removed 2 large sites from North Dorset's supply (references A02 and A04) because the Council had not provided any up to date information from the developers for these sites and applications for reserved matters had not been made (paragraphs 53 and 57); and
- In an appeal decision regarding land within the Westhampnett / North East Strategic Development Location, North of Madgwick Lane, Chichester¹⁴, an Inspector removed the second phase of a wider site that is under construction on the basis that an application for reserved matters had not been made for phase 2 and the fact that a major housebuilder was progressing phase 1 was not in itself clear evidence (paragraph 82).

3.20 In a decision relating to an appeal regarding land at Weddington Road, Weddington, Nuneaton¹⁵, the Inspector concluded that Nuneaton and Bedworth could not demonstrate a 4 year housing land supply. The Inspector found that the deliverable supply was closer to my figure on behalf of the Appellant of 2.74 years. In doing so, the Inspector removed (amongst other sites):

- A site with outline planning permission at Discovery Academy where there was no clear evidence of firm progress being made towards the submission of a reserved matters. The Inspector stated: *"The information from the Council does not explain what the application for reserved matters would look like, when it will be made or when applications to discharge the pre- commencement conditions set out in the outline planning permission are to be made. Further decisions on funding are also required in the Summer. To conclude that even with slippage all 58 units could be delivered by 2028 is not borne out in the evidence before me. It*

¹¹ PINS refs: 2197532 and 2197529 – core document **8.6**

¹² PINS ref: 3227970 – core document **8.7**

¹³ PINS ref: 3284485 – core document **8.8**

¹⁴ PINS ref: 3270721 – core document **8.9**

¹⁵ PINS ref: 3330615 – 26th July 2024 – core document **8.10**



should not be considered deliverable at the base date and 58 dwellings should be removed from the supply” (paragraphs 164 and 165);

- A site with outline planning permission at Hospital Lane where there was no clear evidence of firm progress being made towards site assessment work or the submission of a reserved matters application (paragraphs 172 and 173);
- A site at West of Bulkington which had a resolution to grant full planning permission and the issuing of the planning permission had been “imminent” for some time but the S106 agreement has still not been issued (paragraphs 174 and 174); and
- A site at Phoenix Way / Wilsons Lane which had outline planning permission but “There is no firm progress with the site assessment work to support a reserved matters application, information as to who is going to submit the reserved matters application, what it will be for or when it is going to be determined. None of the timescales have been confirmed in a written agreement with the developer and it is still unknown who the developer will be. There is no clear evidence of deliverability and 73 should be removed from the supply”.

The most up to date evidence

- 3.21 In an appeal regarding land on the east side of Green Road, Woolpit¹⁶, the Inspector found Mid Suffolk Council’s approach in publishing its AMR and then retrospectively seeking evidence to justify its position “wholly inadequate”. Paragraph 70 of the appeal decision states:

“the Council has had to provide additional information to demonstrate that sites are deliverable as and when it has surfaced throughout the weeks and months following the publication of the AMR in an attempt at retrospective justification. It is wholly inadequate to have a land supply based upon assertion and then seek to justify the guesswork after the AMR has been published.”

- 3.22 However, evidence can post date the base date to support the sites in the deliverable supply and not seek to introduce new sites. In an appeal regarding land to the east of Newport Road and to the east and west of Cranfield Road, Woburn Sands (Milton Keynes)¹⁷, the Secretary of State agreed with Inspector Gilbert-Woolridge that the latest available evidence should be used when considering deliverability. Paragraph 12 of the Secretary of State’s decision letter dated 25th June 2020 states:

“For the reasons given at IR12.8-12.12 the Secretary of State agrees with the Inspector that it is acceptable that the evidence can post-date the base date provided that it is used to support sites identified as deliverable as of 1 April 2019 (IR12.11)”.

¹⁶ PINS ref: 3194926 – core document **8.5**

¹⁷ PINS ref: 3169314 – core document **8.11**



3.23 Similarly, in a decision regarding land off Darnhall School Lane, Winsford¹⁸, the Secretary of State agreed with Inspector Middleton that it is appropriate to take into account information received after the base date if it affects sites included in the deliverable supply¹⁹.

3.24 This means that where sites have not progressed as the Council's trajectory claimed at the time the position statement was published, the supply should be reduced. In the Audlem Road appeal²⁰, the Secretary of State removed from Cheshire East Council's supply;

“a site where there is no application and the written agreement indicates an application submission date of August 2019 which has not been forthcoming, with no other evidence of progress”. (paragraph 21 of the Decision Letter dated 15th July 2020)

3.25 Cheshire East Council's Housing Monitoring Update (HMU) had a base date of 31st March 2019 and was published in November 2019. Representations by both parties on the HMU were received with the final comments received on 12th February 2020 (DL paragraph 7). Therefore, whilst the written evidence for this site explained a planning application would be made on this site in August 2019 because the application was not forthcoming by the time the decision was made and no other evidence of progress had been provided, the Secretary of State removed the site from the supply.

The form and value of the evidence

3.26 In the Woburn Sands appeal decision referred to above, the Secretary of State agreed with the Inspector that a proforma can, in principle, provide clear evidence of a site's deliverability (please see paragraph 12 of the decision letter and paragraphs 12.13 to 12.15 of the Inspector's Report). However, the evidential value of the written information is dependent on its content. The Secretary of State and Inspectors have concluded that it is simply not sufficient for Councils to provide agreement from landowners and promoters that their intention is to bring sites forward. The evidence needs to provide a realistic prospect that housing will be delivered on the site within five years.

3.27 For example, in allowing an appeal for 120 dwellings at land east of Gleneagles Way, Hatfield Peverel²¹, the Secretary of State found Braintree Council could not demonstrate a five year housing land supply.

3.28 Braintree Council claimed that it could demonstrate a 5.29 year supply. In determining the appeal, the Secretary of State concluded that the Council could only demonstrate a 4.15 year supply. The reason for this is set out in paragraph 41 of the decision letter (page 7), which states:

¹⁸ PINS ref: 2212671 – core document **8.12**

¹⁹ Paragraph 344 of the Inspector's Report and paragraph 15 of the Decision Letter.

²⁰ PINS refs: 2197532 and 2197529 – core document **8.6**

²¹ PINS ref: 3180729 – core document **8.13**



“Having reviewed the housing trajectory published on 11 April, the Secretary of State considers that the evidence provided to support some of the claimed supply in respect of sites with outline planning permission of 10 dwellings or more, and sites without planning permission do not meet the requirement in the Framework Glossary definition of “deliverable” that there be clear evidence that housing completions will begin on site within five years. He has therefore removed ten sites from the housing trajectory”

- 3.29 The ten removed sites are listed in a table provided at Annex D on page 24 of the Secretary of State’s decision letter. Of the ten sites removed from Braintree’s supply, 9 had outline planning permission and the remaining site was an allocated site with a hybrid planning application pending determination. For these sites, Braintree Council had submitted completed forms and emails from landowners, developers and their agents providing the timescales for the submission of reserved matters applications and anticipated build rates²². However, the Secretary of State removed these sites because he did not consider they met the definition of “deliverable” as set out in the Framework.
- 3.30 As part of its case in seeking to defend an appeal against its decision to refuse to grant outline planning permission for up to 140 no. dwellings at land off Popes Lane, Sturry²³, Canterbury City Council claimed that it could demonstrate a 6.72 year supply. For there to be a shortfall in the supply, Canterbury Council claimed that some 1,654 dwellings (out of 6,455 dwellings) would have to be removed from the “deliverable” supply.
- 3.31 The Inspector, however, found that the Council could not demonstrate a five year housing land supply. The Inspector concluded that the deliverable supply was 4,644 dwellings, which equates to 4.8 years. The reason why the Inspector concluded that the deliverable supply was 1,811 dwellings (28%) less than the Council claimed was because he found that 10 sites should be removed from the supply because:

“there is insufficient clear evidence to show that they meet the NPPF’s definition of deliverable. Sites which are not deliverable cannot be counted as part of the supply for the purposes of meeting the 5-year requirement.” (paragraph 23)

- 3.32 In this case, Canterbury Council had provided statements of common ground between the Council and the developer or landowner to support the inclusion of several of the disputed sites. However, the Inspector found that the statements of common ground did not demonstrate that the development prospect was realistic. Paragraph 23 of the appeal decision states:

“For a number of the disputed sites, the Council’s evidence is founded on site-specific SCGs which have been agreed with the developer or landowner of the site in question. I appreciate that the PPG refers to SCGs as an admissible type of evidence,

²² Appendix EP3

²³ PINS ref: 3216104 – core document 8.14



and I have had full regard to that advice. But nevertheless, the evidential value of any particular SCG in this context is dependent on its content. In a number of cases, the SCGs produced by the Council primarily record the developer's or landowner's stated intentions. Without any further detail, as to the means by which infrastructure requirements or other likely obstacles are to be overcome, and the timescales involved, this type of SCG does not seem to me to demonstrate that the development prospect is realistic. In addition, most of the site-specific SCGs are undated, thus leaving some uncertainty as to whether they represent the most up-to-date position."

- 3.33 Similarly, as part of its case in seeking to defend an appeal made by Parkes Ltd against its decision to refuse to grant outline planning permission for up to 53 dwellings at land to the south of Cox Green Road, Rudgwick²⁴, Waverley Council claimed it could demonstrate a supply of 5,708 dwellings, which equated to just under 5.2 years against its housing requirement and buffer.
- 3.34 The Inspector concluded that the supply should be reduced by 928 dwellings and therefore that Waverley Council could only demonstrate a "deliverable" supply of 4.3 years. The reasons why the Inspector considered the supply should be reduced are set out in paragraphs 10 to 27 of the appeal decision. I note that whilst Waverley Council's assumptions of delivery on a site at Dunsfold Park relied on estimated numbers of delivery from a pro-forma returned by the site's lead developer, the Inspector however considered that the details contained within it were "scant". There was no explanation as to how the timings of delivery could be achieved including the intended timescales for submitting and approving reserved matters, applications of discharge of conditions, site preparation and installing infrastructure. The Inspector therefore did not include the site.
- 3.35 I now refer to two appeal decisions in Oxfordshire and one in Central Bedfordshire where the definition of "deliverable" and "clear evidence" were considered. For these cases I also append the clear evidence the Councils in those cases relied on.

Little Sparrows, Sonning Common (South Oxfordshire) Appeal Decision

- 3.36 At the time the South Oxfordshire Local Plan was examined, the Council's 5YHLS position at 1st April 2020 was that it could demonstrate a 5.35 year supply. These claims were tested soon after the Local Plan was examined at an inquiry in relation to an appeal regarding Little Sparrows, Sonning Common²⁵. In that case, the Inspector concluded that the Council could only demonstrate a 4.21 year supply.
- 3.37 Paragraph 18 of the appeal decision explains that at the inquiry, the Council's case had fallen to 5.08 years. The Council's case at that time was that it could demonstrate a deliverable 5YHLS of 5,785

²⁴ PINS ref: 3227970 – core document **8.7**

²⁵ PINS ref: 3265861 – 25th June 2021 – core document **8.15**



dwelling and the Appellant's case was that it could demonstrate a deliverable 5YHLS of 4,789 dwellings. The difference between the two positions was 996 dwellings on 15 sites as set out in table 3 of the SoCG for that case as referred to in paragraph 19 of the appeal decision.

3.38 Paragraphs 20 and 21 of the appeal decision then state:

"20. I have also had regard to the PPG advice published on 22 July 2019 on 'Housing supply and delivery' including the section that provides guidance on 'What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking.' The PPG is clear on what is required:

"In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions."

This advice indicates to me the expectation that 'clear evidence' must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.

21. Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are there planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed. Securing an email or completed pro-forma from a developer or agent does not in itself constitute 'clear evidence'. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward. (emphasis added)

3.39 This is relevant because in that case the Council had submitted emails from those promoting sites²⁶. However, the Inspector in that case found that such emails were not clear evidence as set out in the paragraphs above.

3.40 Paragraph 22 of the appeal decision then stated:

"It is not necessary for me to go through all of the disputed sites in Table 3 of SoCG 5. **In my view, the Council was not able to provide clear evidence of delivery on most of the disputed sites which significantly undermines its position.** For example, the Council suggests that 100 dwellings would be delivered at Site 1561: Land to the south of Newham Manor, Crowmarsh Gifford whereas the Appellant says 100 dwellings should be deducted. The comments set out by the Appellant for this site in Table 3 are compelling. Similarly, at Site 1009: Land to the north east of Didcot, the

²⁶ Appendix EP4



Council suggests 152 dwellings would be delivered whereas the Appellant says 152 dwellings should be deducted. The Appellant provides cogent evidence to support its case. Furthermore, at Site 1418: Land at Wheatley Campus, the Council agrees a deduction but only of 62 dwellings whereas the Appellant says the deduction should be 230. **There is no clear evidence before me that would suggest that these sites or indeed most of the disputed sites would deliver the completions suggested by the Council in the next five years**” (emphasis added)

3.41 Paragraph 23 of the appeal decision states:

“Overall, I consider that the Appellant’s assessment of supply set out in Table 2 of SoCG 5 is more realistic taking into account the test of deliverability set out in Appendix 2 to the NPPF and the PPG advice published on 22 July 2019. I am satisfied that the Appellant’s approach is consistent with national policy, case law, appeal decisions and informed by current housebuilder sales rates, assessment of the technical complexities of delivering development sites and experience of the housebuilding industry including lead-in times”

3.42 Finally, paragraph 25 of the appeal decision states:

“I consider that the Council’s supply figure should be reduced to reflect the Appellant’s position set out in Table 2 of SoCG 5. The Council’s supply figure of 5,785 dwellings in Table 2 should be reduced to give a more robust total supply figure of 4,789 dwellings for the five year period. Although the Council maintains there is a 5.08 year supply, the evidence that is before me indicates a housing land supply equivalent to 4.21 years. The implications of not having a five-year housing land supply are significant. Not only is there a shortfall, but it also means most important policies for determining the application are automatically out-of-date. The Council accepts that means all the policies in the SOLP and the SCNP are out-of-date. It also means if the paragraph 172 tests in the NPPF are satisfied then the tilted balance applies.”

Land west of Wroslyn Road, Freeland (West Oxfordshire) appeal decision²⁷

3.43 In this case, West Oxfordshire accepted that it could not demonstrate a deliverable 5YHLS. However, the extent of the shortfall was not agreed. My evidence on behalf of the Appellant in that case was that 1,691 dwellings should be removed from West Oxfordshire’s 5YHLS. The Inspector found that the figure the 5YHLS was closer to my position of 2.5 years rather than the Council’s figure of 4.1 years (paragraph 59).

3.44 Paragraphs 50 to 57 of the appeal decision set out the Inspector’s findings on the disputed sites in that case. For the disputed sites, West Oxfordshire had provided emails and proformas to support the

²⁷ PINS ref: 3301202 – 18th January 2023 – core document **8.16**



inclusion of the sites²⁸. However, the Inspector concluded that this was not “clear evidence” and removed the sites from the deliverable supply.

Land to the east of Langford Road, Biggleswade and north of Queens Way, and Denny Crescent, Langford, Central Bedfordshire²⁹

3.45 In this decision, the Inspector removed 416 dwellings from Central Bedfordshire’s 5YHLS from a site at land north of Houghton Regis which had outline planning permission and phases under construction but no known housebuilder for phases 3b and 4 or timescales for the submission of outstanding reserved matters. For this site, Central Bedfordshire had provided a delivery programme from the promoter of the site³⁰.

3.46 Paragraph 16 of the appeal decision states:

“Land north of Houghton Regis (Site 1) (Ref: HT057) forms part of a large strategic development plan site allocation with outline planning permission. It comprises several phases. A master plan has been approved and a design code has been submitted for Phase 4. Phases 3b and 4 are being marketed as there is no known housebuilder. The timing for the submission of the outstanding reserved matters is unknown. In combination, the evidence provided is not clear that the 416 homes relating to Phase 3b and 4 are deliverable within the relevant 5 year period.”

The fact an application has been submitted may not mean there is clear evidence of deliverability

3.47 In a decision dated 25th August 2022 regarding an appeal made by Salter Property Investments Ltd against the decision of Exeter City Council to refuse to grant outline planning permission for up to 93 dwellings at land off Spruce Close, Exeter³¹, the Inspector found:

- The pro-formas used by Exeter were undated, unsigned and deficient (paragraph 39);
- That 2 sites with outline planning permission and no reserved matters applications pending, and no clear evidence for their inclusion should be removed (paragraphs 40 and 41); and
- That even where reserved matters applications had been made, where those applications are subject to outstanding objections and there is no written agreement with the developer, the sites should not be included because no clear evidence had been provided (paragraphs 42 and 43).

²⁸ Appendix EP5

²⁹ PINS ref: 3341832 – 11th November 2024 – core document **8.17**

³⁰ Appendix EP6

³¹ PINS ref: 3292721 – core document **8.18**



3.48 In the Freeland appeal decision referred to above³², the Inspector removed sites from the Council's supply despite the fact that planning applications had been made. Paragraph 56 states:

"Applications were submitted in January 2021 for sites EW4 and EW5. The same email referred to above refers to consent being granted at the October planning committee, which, when HLS discussions were had at the Inquiry at the end of November, had not happened. I understand that officer illness has caused delays in progressing the applications to committee. However, without an officer report, a recommendation, or even a confirmed committee date, there is currently no clear evidence to indicate that the dwellings at sites EW4 and EW5 included in the Council's PS should be considered deliverable in 5 years. The 156 and 120 dwellings should not, as yet, be included in HLS figures"

3.49 In a decision dated 10th April 2024 relating to an appeal against the decision of East Hampshire Council to refuse to grant outline planning permission for up to 60 dwellings at 46 Lymington Bottom, Four Marks³³, the Inspector removed a site from the deliverable supply because whilst a reserved matters application had been made, clear evidence had not been demonstrated. Paragraph 54 of the appeal decision states:

"Land east of Horndean has only outline planning permission. The Appellant advised that the Council's Environmental Health Officers are concerned about ventilation, their Policy team have concerns about the design of the scheme and the Highway Authority have objected as well as the Parish Council. A reserved matters scheme has been submitted but is undetermined. Therefore, the submitted evidence does not clearly show this is deliverable in the time period and 200 dwellings should be deleted from the supply."

3.50 In the Central Bedfordshire case referred to above³⁴, the Inspector removed:

- An allocated site without planning permission where an outline planning application remained undetermined for a significantly protracted period (paragraph 15); and
- A site with outline planning permission where a reserved matters application had been pending determination for 2 years and was subject to unresolved technical objections (paragraph 17).

3.51 In summary, the above appeal decisions and APS Inspectors found that sites with outline planning permission for major development and allocated sites without planning permission should not be included in the deliverable supply where the respective Councils had failed to provide the clear evidence

³² PINS ref: 3301202 – core document **8.16**

³³ PINS ref: 3329928 – core document **8.19**

³⁴ PINS ref: 3341832 – core document **8.17**



required. In some cases those Councils had provided proformas and other evidence from those promoting sites, and Inspectors and the Secretary of State found this not to be clear evidence.

3.52 I respectfully invite the Inspector to compare the evidence Castle Point has provided to support the inclusion of the category b) sites with the evidence provided by Braintree, South Oxfordshire, West Oxfordshire and Central Bedfordshire which was found not to be clear evidence by the Secretary of State and Inspectors in those cases.



4. Agreed matters re: 5YHLS

- 4.1 As set out in the SoCG on 5YHLS, the following matters are agreed in relation to 5YHLS.

The base date and the 5YHLS period

- 4.2 The base date is the start date for the five year period for which both the requirement and supply should relate. It is agreed that the relevant base date for assessing the 5YHLS the purposes of this appeal is 1st April 2024 and the relevant 5YHLS period is to 31st March 2029.

The figure the 5YHLS should be measured against

- 4.3 Paragraph 78 of the Framework states that the deliverable housing land supply should be measured against the housing requirement set out in adopted strategic policies or against the local housing need where the strategic policies are more than five years old. Footnote 39 of the Framework explains that the 5YHLS will continue to be measured against the adopted housing requirement where it is over five years old but it has been reviewed and found not to require updating.
- 4.4 The adopted strategic policies over five years old and have not been reviewed and found to be up to date. Therefore, it is agreed that in accordance with paragraph 78 and footnote 39 of the Framework, the 5YHLS should be measured against the local housing need as calculated by the standard method set out in paragraph 2a-004 of the PPG. It is agreed that the local housing need calculated using the standard method is 701 dwellings per annum.

The buffer

- 4.5 The Housing Delivery Test (HDT) results for 2023 were published on 12th December 2024. The 2023 result for Castle Point is summarised in the table below:



Table 4.1 – Published 2022 Housing Delivery Test Results

	Number of homes required				Number of homes delivered				HDT %
	2020-21	2021-22	2022-23	Total	2020-21	2021-22	2022-23	Total	
Castle Point	236	355	352	943	144	205	156	505	54%

- 4.6 The HDT result means that the 20% buffer applies, the Council must prepare an action plan and the presumption in favour of sustainable development applies (as well as due to the absence of a 5YHLS).

The Council cannot demonstrate a 5YHLS

- 4.7 The Council cannot demonstrate a 5YHLS even on its own supply figure. However, the extent of the deliverable supply and therefore the extent of the shortfall in the 5YHLS is not agreed as I discuss in the following section of my proof of evidence.



5. Matters not agreed re: 5YHLS - the extent of the deliverable 5YHLS

The extent of the deliverable 5YHLS

5.1 The extent of the deliverable 5YHLS is not agreed. The Council considers that its deliverable 5YHLS at 1st April 2024 equates to 1,143 dwellings comprising of the following sources:

- 573 dwellings on 7 Strategic Site Allocations;
- 494 dwellings on sites with extant planning permission as listed in Appendix 4 of the AMR;
- 36 dwellings on sites listed as “SHLAA Policy Compliant and expired consents”;
- 100 dwellings on the net Brownfield Register sites;
- 180 dwellings on windfall sites; and
- Minus 240 dwellings on losses on strategic sites (i.e. land at Thorney Bay).

5.2 I have assessed the Council’s 5YHLS and conclude that the following sites should be removed for the reasons set out below.

Strategic Site Allocations

5.3 The Council includes 573 dwellings on 7 no. sites which are identified as “Strategic Site Allocations” at 1st April 2024. For the avoidance of doubt, these are not allocations in an adopted plan but were proposed allocations in the “New Castle Point Local Plan Pre-Submission Plan 2018-2033” (December 2019), which was subsequently withdrawn.

5.4 The following sites are disputed.

HO15 - Land south of Scrub Lane (capacity = 49 dwellings, Council’s 5YHLS = 49 dwellings);

HO17 – Hadleigh Island Site (capacity = 52 dwellings, Council’s 5YHLS = 40 dwellings); and

HO22 – Land at Thames Loose Leaf (capacity = 12 dwellings, Council’s 5YHLS = 12 dwellings).

5.5 These 3 sites do not have planning permission or a planning application pending determination. The onus is on the Council to provide clear evidence for their inclusion in the 5YHLS. The AMR simply refers under “Notes on Progress” to “Pre-app”. However, no further details have been provided.



5.6 In my letter of 21st November 2024, I asked the Council to provide me with the clear evidence it relies on for the inclusion of these sites. The Council's response on 12th December 2024 stated:

“The strategic sites mentioned included in the 2018 plan were not the reason the plan was withdrawn and therefore should be considered deliverable.”

5.7 This is not clear evidence of deliverability. With reference to the definition in the Framework, the associated guidance in the PPGs and the appeal decisions I refer to in section 3 of my proof of evidence, in the absence of clear evidence, these three sites are not deliverable and should be removed from the 5YHLS.

HO28 – Land at Admiral Jellicoe (capacity = 24 dwellings, Council's 5YHLS = 24 dwellings)

5.8 The AMR explains that there have been 8 completions on this site. This was under planning application 21/0059/FUL, which was approved on 8th April 2021 for 8 dwellings. It is unclear why the Council now includes 24 dwellings on the site in the 5YHLS. Again, I asked the Council to provide the clear evidence for the inclusion of this site in the 5YHLS. In the absence of such clear evidence, the site is not deliverable and should be removed from the 5YHLS.

HO25 – Land at Thorney Bay (net capacity = 139 dwellings, Council's 5YHLS = 120 net dwellings)

5.9 Thorney Bay Park is a caravan / mobile home park. The AMR explains that the gross capacity of this site is 565 dwellings but 426 dwellings are to be demolished. Therefore, the net capacity is 139 dwellings. The Council's 5YHLS includes 360 gross dwellings on this site and then removes 240 dwellings. Therefore, the Council's net 5YHLS is 120 dwellings.

5.10 In the column “Notes on progress” on page 11 of the AMR, the Council states “proceeding under existing consents. Figures correct at April 2024”. In my letter of 21st November 2024, I asked the Council to provide me with:

- The reference numbers and details of the existing consents referred to;
- A breakdown of the losses and completions to date per year; and
- The clear evidence the Council relies on for the inclusion of 120 (net) dwellings on this site.

5.11 The Council's response of 12th December 2024 does not refer to this site. It is unclear which permissions the entry in the AMR relates to, how many homes are to be constructed and demolished in the 5YHLS period. In the absence of clear evidence, 120 net dwellings should be removed.



Sites with extant planning permission

5.12 The Council includes 494 dwellings in the 5YHLS on sites with extant planning permission at 1st April 2024. However, this is disputed for the following reasons.

- Firstly, Appendix 4 of the AMR only lists 475 dwellings not 494 dwellings;
- Secondly, the 475 figure includes:
 - 55 dwellings at land west of Canvey Road, which is already listed in the Strategic Site Allocations;
 - 8 dwellings at Walsingham House are already included in the Strategic Site Allocations; and
 - 14 dwellings at Haystack car park is already included in the Strategic Site Allocations.

5.13 Thirdly, the 475 figure includes 23 (net) dwellings which have already been completed. These are listed in the table in my letter of 21st November 2024.

5.14 Therefore, 375 dwellings should be included in the 5YHLS from this source (i.e. $475 - 55 - 8 - 14 - 23 = 375$). This results in a reduction of **119 dwellings** from the Council's 5YHLS.

“SHLAA Policy Compliant and expired consents”

5.15 The Council includes 36 dwellings on sites in this category in the 5YHLS. However, paragraph 78 of the Framework requires the Council to identify specific deliverable sites. These have not been identified. In addition, the definition of deliverable states that sites with full planning permission should be included unless permission expires. **36 dwellings** should be removed.

Brownfield register sites

5.16 The Council includes 100 dwellings on unidentified sites on its brownfield register. However, as above, paragraph 78 of the Framework requires specific sites to be identified and the definition of deliverable requires the Council to provide clear evidence for their inclusion in the 5YHLS. I asked the Council to identify the sites and provide the clear evidence for their inclusion. The Council's response did not provide this and therefore **100 dwellings** should be removed.

Windfall sites

5.17 The Council includes 180 dwellings on unidentified windfall sites in its 5YHLS as follows:



Table 5.1 – Castle Point’s windfall allowance

Year 1 2024/25	Year 2 2025/26	Year 3 2026/27	Year 4 2027/28	Year 5 2028/29	5YHLS
0	0	60	60	60	180

5.18 The windfall allowance assumes that currently unknown sites will become available, receive planning permission and deliver housing in the five year period.

National Planning Policy and Guidance

5.19 Paragraph 75 of the Framework states:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

5.20 The definition of “windfall sites” is provided on page 76 of the Framework as follows:

“Sites not specifically identified in the development plan”.

5.21 Paragraph 3-023 of the PPG³⁵ states:

“A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework.”

Compelling evidence

5.22 As the development plan in this case was adopted in 1998, most sites in the identified supply are windfall sites. The Council has not provided any compelling evidence for the inclusion of 180 dwellings as a windfall allowance in addition to the known windfall sites already included in the 5YHLS. Therefore, **180 dwellings** should be removed from the 5YHLS.

³⁵ Reference ID: 3-023-20190722: “How should a windfall allowance be determined in relation to housing?”



6. Conclusions in relation to 5YHLS

6.1 I therefore conclude that the 5YHLS at 1st April 2024 is 463 dwellings. Against the Local Housing Need and a 20% buffer, this equates to **0.55 years** as shown in the following table:

Table 6.1 – Castle Point’s 5YHLS at 1st April 2024

		Council	Appellant
	Requirement		
A	Annual local housing need	701	
B	5YHLS requirement without buffer (A X 5 years)	3,505	
C	5YHLS requirement plus 20% buffer (B + 20%)	4,206	
D	Annual 5YHLS requirement plus 20% (C / 5)	841	
	Supply		
E	5YHLS at 1 st April 2024	1,143	463
F	Supply in years (E / D)	1.36	0.55
G	Surplus / shortfall in 5YHLS (E – C)	-3,063	-3,743

6.2 The policy implication of this is addressed by Matthew Wood.



7. Appendices

- EP1.** Letter to Council re 5YHLS – 21st November 2024
- EP2.** Response from Council – 12th December 2024
- EP3.** Braintree proformas
- EP4.** South Oxfordshire evidence
- EP5.** West Oxfordshire evidence
- EP6.** Central Bedfordshire evidence



Appendices to Proof of Evidence of Ben Pycroft
re: Housing Land Supply

For Countryside Partnerships (Eastern Home Counties) | 24-383

Construction of 173 no. dwellings including public open space, landscaping, access, drainage, parking, servicing, utilities and all associated infrastructure and ancillary buildings at land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex

LPA ref: 22/0484/FUL, PINS ref: APP/M1520/W/24/3351658

Appendices

- EP1.** Letter to Council re 5YHLS – 21st November 2024
- EP2.** Response from Council – 12th December 2024
- EP3.** Braintree proformas
- EP4.** South Oxfordshire evidence
- EP5.** West Oxfordshire evidence
- EP6.** Central Bedfordshire evidence



EP1

David Gittens
Castle Point Borough Council

21 November 2024
EP ref: 24-383

By e-mail only to: [REDACTED]

Dear David Gittens

Re: PINS ref: 3351658 – Land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex

I am the Appellant's housing land supply witness for the above appeal. I write requesting further information on the following aspects of the Council's 5 Year Housing Land Supply (5YHLS) as set out in the Authority Monitoring Report (AMR) April 2022 – March 2024¹.

Overview

I understand the Council's position is that it has a deliverable supply at 1st April 2024 of 1,143 dwellings, which against the local housing need (of 355 dwellings per annum) plus a 20% buffer equates to 2.68 years. This is set out in the tables on pages 11 and 12 of the AMR.

Please confirm why the 5YHLS trajectory on page 11 of the AMR differs from the chart on page 12 of the AMR as summarised in the table below:

	Year 1 2024/25	Year 2 2025/26	Year 3 2026/27	Year 4 2027/28	Year 5 2028/29	5YHLS
Table AMR page 11	172	219	226	249	277	1,143
Chart AMR page 12	152	199	206	237	255	1,049
Difference	20	20	20	12	22	94

¹ [authority-monitoring-report-april-2022-march-2024.pdf](#)

Local housing need (LHN)

The fifth paragraph on page 9 of the AMR explains that the (current) standard method results in a LHN of 355 dwellings per annum.

I calculate the LHN (using the current standard method) at 1st April 2024 to be capped at 349 dwellings per annum based on the following:

- Step 1 – Setting the baseline. The average annual increase over the period 2024-34 is 249.6.
- Step 2 – An adjustment to take account of affordability. The latest affordability ratio for Castle Point (published 25/03/24) is 11.2. The adjustment factor is therefore 1.45 and applying this to the average annual increase in step 1 results in an uncapped LHN of 361.92.
- Step 3 – Capping the level of any increase. In this case, the LHN is capped at 40% above the projected household growth over the 10 year period identified in step 1. The capped LHN is therefore 349.44.
- Step 4 – Cities and urban centres uplift. This does not apply to Castle Point.

Please confirm that the LHN using the current standard method at 1st April 2024 is 349 dwellings per annum.

Please also confirm that you agree the outcome of the Government's proposed revised LHN for Castle Point is 685 dwellings per annum.

Strategic Site Allocations

The table on page 11 of the AMR lists 12 "Strategic Site Allocations". Please confirm that these are not allocations in an adopted plan but were proposed allocations in the "New Castle Point Local Plan Pre-Submission Plan 2018-2033" (December 2019), which was subsequently withdrawn.

With reference to the definition of "deliverable" as set out in the Annex on page 69 of the Framework, please provide the "clear evidence" the Council relies on for the inclusion of the following sites in the 5YHLS:

- HO15 – Land south of Scrub Lane (49 dwellings in the 5YHLS);
- HO17 – Hadleigh Island Site (40 dwellings in the 5YHLS);
- HO22 – Land at Thames Loose Leaf (12 dwellings in the 5YHLS); and
- HO28 – Land at Admiral Jellicoe (24 dwellings).

Without clear evidence of deliverability, these sites should not be included in the 5YHLS.

Land at Thorney Bay

The table on page 11 of the AMR shows that 360 (gross) dwellings are included at HO25 – land at Thorney Bay in the 5YHLS. It also shows 240 losses on Strategic Sites in the 5YHLS.

The "notes on progress" within this table states that the development at Thorney Bay is "proceeding under existing consents. Figures correct at April 2024". Please provide:

- The reference numbers and details of the existing consents referred to;
- A breakdown of the losses and completions to date per year. I note that the first table on page 10 of the AMR explains that 151 caravans at Thorney Bay were permanently removed in 2023/24; and
- The clear evidence the Council relies on for the inclusion of 120 (net) dwellings on this site in the 5YHLS period as summarised in the table below.

	Year 1 2024/25	Year 2 2025/26	Year 3 2026/27	Year 4 2027/28	Year 5 2028/29	5YHLS
Anticipated Completions	75	75	70	70	70	360
Demolitions	-50	-50	-50	-50	-40	-240
Total (net)	25	25	20	20	30	120

Other Net Extant Planning Permissions at 1st April 2024

The table on page 11 of the AMR explains that the net capacity of sites with extant planning permission at 1st April 2024 is 569 dwellings. The trajectory explains that 494 dwellings are in the 5YHLS as summarised as follows:

	Year 1 2024/25	Year 2 2025/26	Year 3 2026/27	Year 4 2027/28	Year 5 2028/29	5YHLS
Other net extant planning permissions at 1 st April 2024	125	114	90	85	80	494

Appendix 4 of the AMR (pages 62-71) provides “Information on extant housing consents” at 1st April 2024. However:

- The net capacity of these sites in total is 475 dwellings, not 569 dwellings (or 494 dwellings);
- The 475 figure includes the following sites already listed as “Strategic Site Allocations”:
 - 55 dwellings at Land west of Canvey Island – included in the table on page 11 of the AMR for 32 dwellings;
 - 9 dwellings at Walsingham House – included as part of the 42 dwellings on this site included in the table on page 11 of the AMR; and
 - 14 dwellings at the Haystack Public House – included in the table on page 11 of the AMR.
- The net remaining capacity of the following sites does not reflect the completions also listed:

Ref	Address	Existing	Proposed	Net	Completions
23/0552/FUL	Land rear of 33 Croft Road	0	4	4	3
21/0959/FUL	24 Homelands Avenue	1	1	0	-1
18/1063/FUL	166/168 Kiln Road	3	10	7	-3
15/0501/FUL	84 Vicarage Hill	1	3	0	-1
21/0688/FUL	Walsingham House	0	9	9	1

Ref	Address	Existing	Proposed	Net	Completions
22/0223/FUL	44 Paarl Road	1	2	1	-1
CPT/490/13/FUL	125-127 High Street	0	14	14	5
18/0367/FUL	191-193 High Street	2	0	-2	-2
21/0140/FUL	9 and 11 Juliers Road	2	1	-1	-2
CPT/111/02/FUL	Hole Haven Caravan Park	0	17	17	10
27/0073/FUL	27 Craven Avenue	1	2	1	-1
18/0356/FUL	Land adjacent to 3 St Davids Walk	1	1	1	1
18/0991/FUL	Land adj 14 Station Approach	0	4	4	3
16/0954/FUL	40 Park Road	1	2	1	-1
CPT/24/05/FUL	320 London Road, Hadleigh	0	32	32	12
21/0605/FUL	47 Castle Road, Hadleigh	0	3	3	1
21/0333/FUL	66 Wavertree Road, Benfleet	1	5	4	-1

Please therefore provide a list of the sites with extant planning permission the Council relies on to include 494 dwellings in the 5YHLS.

Net SHLAA Policy Compliant and Expired Permissions

The table on page 11 of the AMR states that SHLAA policy compliant and expired consent sites have a combined capacity of 138 dwellings. Of these, 36 dwellings are included in the 5YHLS as follows.

	Year 1 2024/25	Year 2 2025/26	Year 3 2026/27	Year 4 2027/28	Year 5 2028/29	5YHLS
Net SHLAA Policy Compliant and Expired Permissions	0	8	8	8	12	36

Paragraph 77 of the Framework requires the Council to “identify” a 5YHLS of “specific deliverable sites”. Please therefore confirm which sites the 36 dwellings are on and provide the clear evidence required for their inclusion in the 5YHLS.

Net Brownfield Register

The table on page 11 of the AMR states that Brownfield Register sites have a combined capacity of 335 dwellings. Of these, 100 dwellings are included in the 5YHLS as follows.

	Year 1 2024/25	Year 2 2025/26	Year 3 2026/27	Year 4 2027/28	Year 5 2028/29	5YHLS
Net Brownfield Register	0	20	20	25	35	100

As above, paragraph 77 of the Framework requires the Council to “identify” a 5YHLS of “specific deliverable sites”. Please therefore confirm which sites the 100 dwellings are on and provide the clear evidence required for their inclusion in the 5YHLS.

Windfall sites

The table on page 11 of the AMR states that windfall sites have a combined capacity of 480 dwellings. Of these, 180 dwellings are included in the 5YHLS as follows.

	Year 1 2024/25	Year 2 2025/26	Year 3 2026/27	Year 4 2027/28	Year 5 2028/29	5YHLS
Windfall	0	0	60	60	60	180

The definition of windfall sites is set out in the Annex on Page 76 of the Framework as follows:

“Sites not specifically identified in the development plan”

Paragraph 72 of the Framework states:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

As the development plan in this case was adopted in 1998, the majority of sites in the identified supply are windfall sites. Please provide the compelling evidence the Council relies on for the inclusion of 180 dwellings on windfall sites in addition to those known windfall sites with planning permission or otherwise included elsewhere in the 5YHLS.

Next steps

As you are aware, the date for the exchange of evidence is 18th December 2024. I therefore look forward to your response to this letter as soon as possible.

Following receipt of the information requested, I will draft a Statement of Common Ground (SoCG) on 5YHLS and send it to the Council for review and comment. The SoCG will set out a list of matters agreed in relation to the 5YHLS calculation (e.g. the base date, local housing need, 20% buffer) and identify the disputed sites and / or sources of supply.

In the meantime, should you wish to discuss, please do not hesitate to contact me.

Yours sincerely
Emery Planning

Ben Pycroft

Ben Pycroft BA (Hons), DIP TP, MRTPI
Director

01625 442 799
[REDACTED]

Cc Stephen Garner (Assistant Director for Development Services) [REDACTED]
Mitchell Kitts (Head of Planning) [REDACTED]
Matthew Wood (Phase 2 Planning) [REDACTED]

EP2

Kay Neild

From: David Gittens [REDACTED]
Sent: 12 December 2024 09:15
To: Ben Pycroft; Matthew Wood
Cc: Stephen Garner; Mitchell Kitts; Alex Harrison
Subject: RE: [EXTERNAL] - RE: APP/M1520/W/24/3351658 - Land at Brook Farm - 22/0484/FUL - Council's Statement of Case
Attachments: Statement of Common Ground_Brook Farm_ Dec 2024 (005) DG.docx

Good morning Ben and Matthew, and thank you for your emails.

Please find attached an amended version of the Statement of Common Ground for your information and use.

I also provide the following comments in respect of Ben's letter in respect of the Council's 5YHLS:

With regard to the overview, the graph is only meant as a graphical view, there is an error in this graph, all data uses the table itself. The local housing need at the time the AMR was written is 355 homes per annum. We agree that yes the consultation from the Government for changes to the NPPF includes a housing figure for Castle Point at 685 homes per annum, however currently that figure has no weight.

The consultation was just a consultation and many Councils including Castle Point responded by suggesting the housing needs figure is too high and doesn't take into account local constraints. Therefore the figure is still subject to change.

The strategic sites mentioned included in the 2018 plan were not the reason the plan was withdrawn and therefore should be considered deliverable.

With regard to arguments surrounding net extent, if all issues raised by the appellant are included in the figures, the 5YHLS would only change by roughly 6 months. This would not materially change the material planning consideration that the Council is under the 5 year housing land supply baseline and therefore arguing about the exact figure seems to be a moot point. However the Council's figure is presently 2.34 years.

With regard to the Brownfield sites these can be found on the published brownfield register and the figures follow common trends of delivery on Brownfield sites.

Finally with regard to windfall, on small sites alone (sites equal to or smaller than 5 units) over the past 10 years the Council has delivered 47 units per annum even including years affected by Covid-19.

In conclusion, the difference in the 5YHLS figures is minor. The material planning consideration is that Castle Point is well under the 5 Year Housing Land Supply baseline as required in planning law.

I hope our comments are of assistance and clarifying.

Kind regards

David

David Gittens

Principal Planning Officer

Place & Communities

Castle Point Borough Council

[dgittens](#) [REDACTED]



Castle Point Borough Council | T: **01268 882200** | E: [REDACTED] | W: www.castlepoint.gov.uk

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Any advice received from officers is without prejudice to the decision-making processes of the local planning authority, and in no way prejudices any future determinations or decisions made by the local planning authority. We advise that you seek independent advice on planning issues and those issues raised within this email.

EP3

Braintree District Monitoring Report 2018
Addendum to the Monitoring Report:

Subject:

Five Year Housing Supply 2018-2023



11 April 2019

From: [Carpenter, Kathy](#)
To: [Laura Dudley-Smith](#)
Subject: RE: Request for information forecast development Land south of The Limes Gosfield
Date: 04 December 2018 10:02:00

Many thanks for your help, I think I can take it from here.

Best wishes,

Kathy

From: Laura Dudley-Smith
Sent: 03 December 2018 17:35
To: Carpenter, Kathy <kathy.carpenter@braintree.gov.uk>
Cc: James Firth
Subject: RE: Request for information forecast development Land south of The Limes Gosfield

Dear Kathryn,

The land at Gosfield is no longer owned by Marden Homes Ltd. We are now acting on the site on behalf of it's new owner, Chelsteen Homes. The contact there is Bill Poulton.

A revised planning application has been submitted to BDC for consideration. There are no significant issues that have been identified however that should present delay to delivery should the revised application be determined favourably.

Please let me know if you would like us to complete a revised form in this regard.

Laura

Laura Dudley-Smith
Strutt & Parker

From: Carpenter, Kathy [<mailto:kathy.carpenter@braintree.gov.uk>]
Sent: 30 November 2018 17:38
To: Laura Dudley-Smith
Subject: Request for information forecast development Land south of The Limes Gosfield
Importance: High

Dear Laura,

Please see the attached file. Braintree District Council needs to check information the anticipated timing of completions on the above site, as part of work on checking the deliverable housing land supply in the District. Our records show that you were the contact for the development; could you please advise on the site or provide contact details for someone who can confirm?

Kind regards,

Kathryn Carpenter
Senior Planning Officer

Please return forms by Friday 7th December 2018



Review of Housing Sites Identified in the 5 Year Supply 2018-2023

The National Planning Policy Framework (July 2018) requires local planning authorities to identify and update annually a supply of specific deliverable sites to be measured against their housing requirements (paragraph 73). As part of this process, local planning authorities are required to engage with developers and others who have an impact on delivery (see paragraph 74).

As you represent one or more of these sites, we would appreciate you taking the time to fill out the below form. Please complete a separate form for each site.

This form can be returned electronically to planningpolicy@braintree.gov.uk or in hard copy if necessary to: Planning Policy, Braintree District Council, Causeway House, Bocking End, Braintree, CM7 9HB.

This form has three parts: Part A – Developer/Company/promoter Details, Part B - Site details and Part C – Site Progress

PART A Developer/Promoter Details

Contact Name:	Steve Read
Position:	Divisional Development & Planning Manager
Organisation:	Bellway Homes Ltd
E-mail Address:	
Telephone Number:	

PART B Site Details (please use separate form for each site)

Site Address/Location:	Site 38 Land east of Sudbury Road Halstead
Planning application reference(s):	BTE/17/0705

Is the site:

Owned by Developer ☒

Site Actively
being marketed ☐

Sale to developer
under negotiation ☐

Site not actively
being marketed ☐

PART C Site Progress


Will Housing completions begin on site before April 2023?	Yes
Planning Status at 31 March 2018:	Outline planning permission
Update on Planning Status:	Full application submitted for 218 homes BTE/18/01749, agent jennifer.carroll@struttandparker.com

Site Progress cont.. HALSTEAD

Full/reserved-matters status: approved, applied for, when planned to be submitted	Submitted <i>FULL APPLICATION SUBMITTED</i>
Details of Discharge of conditions status: submitted	Submitted November 2018; Building Regs Initial Notice (NHBC) submitted
Information on Constraints: Actions needed before completions can be achieved	<i>PLANNING APPROVAL AND COMMENCEMENT OF BUILD.</i>
Access/transport:	<i>ACCESS POINTS AGREED AT OUTLINE APPROVAL</i>
Ground conditions/ contamination:	<i>FARM LAND NO CONTAMINATION EXPECTED.</i>
Drainage (SUDS, flood prevention etc):	<i>APPLICATION WITH FULL PLANNING SUBMISSION</i>
Land ownership:	<i>BELLWAY HOMES.</i>
Other constraints (describe), including market:	<i>N/A.</i>

Total/estimated total site capacity	205 <i>OUTLINE</i>
Dwellings built as at 31 March 2018	0
Outstanding capacity as at 31 March 2018	205
Forecast completions Year 1: April 2018/March 2019	<i>0</i>
Forecast completions Year 2: April 2019/March 2020	<i>20</i>
Forecast completions Year 3: April 2020/March 2021	<i>70</i>
Forecast completions Year 4: April 2021/March 2022	<i>70</i>
Forecast completions Year 5: April 2022/March 2023	<i>58</i>

218 FULL APPLICATION

Other developer/site promoter/landowner comments	
(Internal use)	Outline permission for 205 also included site for a care home; whereas this is omitted from the full application for 218 - i.e. supply may exceed the 205 indicated as at March 2018

Return by Friday 7th December 2018 to:

PlanningPolicy@braintree.gov.uk

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From: [Wilde, Mathew](#)
To: [Carpenter, Kathy](#)
Subject: FW: 18/60196/PREAPP Land north East of Inworth Road
Date: 05 February 2019 14:23:41
Attachments: [image001.gif](#)

FYI

Kind Regards,

Mathew Wilde

Senior Planner – Development Management

Braintree District Council | Causeway House, Bocking End, Braintree, CM7 9HB

☎ 01376 552525 Ext. 2512 | www.braintree.gov.uk | ✉ mawil@braintree.gov.uk

From: Catherine Williams **Sent:** 05 February 2019 2:21 PM
To: Wilde, Mathew <Mathew.Wilde@braintree.gov.uk>
Subject: RE: 18/60196/PREAPP Land north East of Inworth Road

Mathew,

In terms of start on site:

- Infrastructure to commence late summer 2019
- With an anticipated build rate of 50 per year we would expect to have 150 completions by April 2023.

Regards,

Catherine Williams BA(Hons) MA MRTPI
Associate Director
Planning

Savills, 33 Margaret Street, London, W1G 0JD
Tel

Email

Website : www.savills.co.uk



Before printing, think about the environment

From: Wilde, Mathew [<mailto:Mathew.Wilde@braintree.gov.uk>]
Sent: 28 January 2019 9:59 AM
To: Catherine Williams
Subject: 18/60196/PREAPP Land north East of Inworth Road

Hi Catherine,

Thank you for our meeting on Friday. I have asked Lee to go through the boundary treatment plan with me this week so I will provide comments on this shortly.

In terms of the coloured block plan, please may I have an electronic copy of this?

I have also been asked if I could get some confirmation in writing from you in respect to timescales for the REM submission? And when roughly will works commence?

Could you also please give an indication if possible please?:

- If the site will start to produce completions before April 2023
- View of expected development rates - how many of the 165 are expected to be completed by April 2023?

Many thanks in advance for your help.

Kind Regards,

Mathew Wilde

Senior Planner – Development Management

Braintree District Council | Causeway House, Bocking End, Braintree, CM7 9HB

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Review of Housing Sites Identified in the 5 Year Supply 2018-2023

The National Planning Policy Framework (July 2018) requires local planning authorities to identify and update annually a supply of specific deliverable sites to be measured against their housing requirements (paragraph 73). As part of this process, local planning authorities are required to engage with developers and others who have an impact on delivery (see paragraph 74).

As you represent one or more of these sites, we would appreciate you taking the time to fill out the below form. Please complete a separate form for each site.

This form can be returned electronically to **planningpolicy@braintree.gov.uk** or in hard copy if necessary to: Planning Policy, Braintree District Council, Causeway House, Bocking End, Braintree, CM7 9HB.

This form has three parts: Part A – Developer/Company/promoter Details, Part B - Site details and Part C – Site Progress

PART A Developer/Promoter Details

Contact Name:	Matthew Wood, agent Phase 2 Planning and Development
Position:	Principal Planner
Organisation:	CALA Homes (North Home Counties) Ltd
E-mail Address:	
Telephone Number:	

PART B Site Details (please use separate form for each site)

Site Address/Location:	Station Field, Land W of Kelvedon Station Station Rd (Monks Farm) Kelvedon
Planning application reference(s):	Site 041 BTE/17/0418

Is the site:

Owned by Developer	<input checked="" type="checkbox"/>	Site Actively being marketed	<input type="checkbox"/>
Sale to developer under negotiation	<input type="checkbox"/>	Site not actively being marketed	<input type="checkbox"/>

PART C Site Progress

Will Housing completions begin on site before April 2023?	Yes, subject to RM approval
Planning Status at 31 March 2018:	Outline permission
Update on Planning Status:	RM to be submitted early 2019

Site Progress cont..

Full/reserved matters status: approved, applied for, when planned to be submitted	RM to be submitted early 2019
Details of Discharge of conditions status: submitted	Condition submissions to be made early 2019
Information on Constraints: Actions needed before completions can be achieved	
Access/transport:	Access approved at outline stage.
Ground conditions/ contamination:	Agricultural land.
Drainage (SUDS, flood prevention etc):	SUDS system to be included within Reserved Matters application.
Land ownership:	CALA Group
Other constraints (describe), including market:	

Total/estimated total site capacity	250
Dwellings built as at 31 March 2018	0
Outstanding capacity as at 31 March 2018	250
Forecast completions Year 1: April 2018/March 2019	0
Forecast completions Year 2: April 2019/March 2020	50
Forecast completions Year 3: April 2020/March 2021	50
Forecast completions Year 4: April 2021/March 2022	50
Forecast completions Year 5: April 2022/March 2023	50

Other developer/site promoter/landowner comments	
(Internal use)	As condition of the outline permission dated October 2017, reserved matters application for first phase must be submitted by October 2019 (i.e. within 2 years)

Return by Friday 7th December 2018 to:

PlanningPolicy@braintree.gov.uk

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From: [Heather Organ](#)
To: [Carpenter, Kathy](#)
Subject: RE: Development site at land at Ashen Road Ridgewell
Date: 13 March 2019 15:13:14
Attachments: [~WRD000.jpg](#)
[image001.png](#)

Dear Kathryn,

We intend to be in a position to submit an application for planning shortly - in late March or early April 2019. Assuming we are successful I would anticipate completion of the whole site in the first quarter of 2021 based on our clients current aspirations.

I am unable to provide the name of the developer at this time but I trust the above information answers your main queries.

Kind Regards,
Heather.

Heather Organ BSc Architecture

Heather

From: Carpenter, Kathy <kathy.carpenter@braintree.gov.uk>
Sent: 13 March 2019 11:51
To: Heather Organ <[REDACTED]>
Subject: Development site at land at Ashen Road Ridgewell
Importance: High

Dear Heather Organ,

We spoke on the telephone recently, when I was enquiring about whether this above site is coming forward for development in the next few years, as you acted as agent for a Mr J Williams in a 2018 pre application, following the sale of the site by the landowner to a developer. The site currently has the benefit of an extant outline permission and is shown as a draft allocation in the emerging Draft Braintree District Local Plan. You kindly provided me with a verbal response, confirming that the site is now owned by a developer, and that a detailed planning application is being drawn up for submission (in 2019?) following on from the pre-application consideration.

Could I please ask if you could provide this confirmation in writing for us – by e-mail response would be fine? If possible, as well as confirming whether the site is expected to start to produce completions by April 2023, any information would be helpful if available on expected estimated timescales for submission of the planning application, start on site, and expected number of dwellings by year –
April 2019/March 2020 (I assume that will be 0)

April 2020/March 2021
April 2021/March 2022, and
April 2022/March 2023.

If you are able to confirm the name of the developer that would also be helpful.

Kind regards,

Kathryn Carpenter

Senior Planning Officer

Braintree District Council | Causeway House, Bocking End, Braintree, CM7 9HB

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Please return forms by Friday 7th December 2018

Braintree
District Council

Review of Housing Sites Identified in the 5 Year Supply 2018-2023

The National Planning Policy Framework (July 2018) requires local planning authorities to identify and update annually a supply of specific deliverable sites to be measured against their housing requirements (paragraph 73). As part of this process, local planning authorities are required to engage with developers and others who have an impact on delivery (see paragraph 74).

As you represent one or more of these sites, we would appreciate you taking the time to fill out the below form. Please complete a separate form for each site.

This form can be returned electronically to planningpolicy@braintree.gov.uk or in hard copy if necessary to: Planning Policy, Braintree District Council, Causeway House, Bocking End, Braintree, CM7 9HB.

This form has three parts: Part A – Developer/Company/promoter Details, Part B - Site details and Part C – Site Progress

PART A Developer/Promoter Details

Contact Name:	Stuart Williamson agent Amec Foster Wheeler
Position:	
Organisation:	The Hunt Property Trust
E-mail Address:	
Telephone Number:	

PART B Site Details (please use separate form for each site)

Site Address/Location:	Land rear of Halstead Road Earls Colne
Planning application reference(s):	BTE/15/1580

Is the site:

Owned by Developer ☐

Site Actively
being marketed ☐

Sale to developer
under negotiation ☒

Site not actively
being marketed ☐

PART C Site Progress

Will Housing completions begin on site before April 2023?	YES
Planning Status at 31 March 2018:	Outline permission
Update on Planning Status:	

Site Progress cont..

Full/reserved matters status: approved, applied for, when planned to be submitted	JULY 2019
Details of Discharge of conditions status: submitted	NONE TO DATE
Information on Constraints: Actions needed before completions can be achieved	NONE BEYOND USUAL
Access/transport:	(Access Reserved ie approved)
Ground conditions/ contamination:	Further investigations per outline
Drainage (SUDS, flood prevention etc):	" " "
Land ownership:	-
Other constraints (describe), including market:	-

Total/estimated total site capacity	80
Dwellings built as at 31 March 2018	0
Outstanding capacity as at 31 March 2018	80
Forecast completions Year 1: April 2018/March 2019	
Forecast completions Year 2: April 2019/March 2020	25
Forecast completions Year 3: April 2020/March 2021	55
Forecast completions Year 4: April 2021/March 2022	
Forecast completions Year 5: April 2022/March 2023	

Other developer/site promoter/landowner comments	
(Internal use)	

Return by Friday 7th December 2018 to:

PlanningPolicy@braintree.gov.uk

If you have any other questions about the consultation please contact the Planning Policy Team by email PlanningPolicy@braintree.gov.uk or by phone on 01376 552525 and ask for Planning Policy.

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From: [Conan Farningham](#)
To: [Carpenter, Kathy](#)
Cc: [Havers, Timothy](#); [Ranks, Natalie](#); [Alice Patchett](#)
Subject: Silver End/Conrad Rd
Date: 01 March 2019 11:00:51
Attachments: [image001.png](#)
[image002.jpg](#)

Morning,

I would advise the following for Conrad Road, Witham (Southfields):

- We have submitted the application and awaiting for further timescales etc
- Yes, this scheme along with Silver End are key to delivering our Homes England Programme and overall targets
- Completions are assumed as follows but these will likely change following appointment of a contractor and also the decision date:

April 2019/March 2020: 0
April 2020/March 2021: 21
April 2021/March 2022: 67
April 2022/March 2023: 36
April 2023/March 2024: 26

Please be advised that we are currently programming the S106 units to be delivered April 21/22 hence the spike in completions.

Regards,

Conan

Conan Farningham
Head of Land and Planning

Sanctuary Group

Office: 02088261598

Email:



From: Carpenter, Kathy [<mailto:kathy.carpenter@braintree.gov.uk>]
Sent: 28 February 2019 15:44
To: Conan Farningham
Subject: RE: Silver End
Importance: High

Dear Conan – thank you very much for your prompt response. Could I please ask, are you able to provide me with the equivalent information in respect of Conrad Road Witham, which I believe you know as Southfields?

Kind regards,
Kathy Carpenter

Kathryn Carpenter
Senior Planning Officer
Braintree District Council | Causeway House, Bocking End, Braintree, CM7 9HB
☎ 01376 552525 Ext. 2564 | www.braintree.gov.uk | ✉ kathy.carpenter@braintree.gov.uk

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Please return forms by Friday 7th December 2018

Review of Housing Sites Identified in the 5 Year Supply 2018-2023

The National Planning Policy Framework (July 2018) requires local planning authorities to identify and update annually a supply of specific deliverable sites to be measured against their housing requirements (paragraph 73). As part of this process, local planning authorities are required to engage with developers and others who have an impact on delivery (see paragraph 74).

As you represent one or more of these sites, we would appreciate you taking the time to fill out the below form. Please complete a separate form for each site.

This form can be returned electronically to **planningpolicy@braintree.gov.uk** or in hard copy if necessary to: Planning Policy, Braintree District Council, Causeway House, Bocking End, Braintree, CM7 9HB.

This form has three parts: Part A – Developer/Company/promoter Details, Part B - Site details and Part C – Site Progress

PART A Developer/Promoter Details

Contact Name:	Stephen M Clark
Position:	Chief Executive
Organisation:	Churchmanor Estates plc
E-mail Address:	
Telephone Number:	

PART B Site Details (please use separate form for each site)

Site Address/Location:	Site 050 Land south of Maltings Lane Witham
Planning application reference(s):	BTE/12/1071

Is the site:

Owned by Developer ☐

Site Actively
being marketed ☐

Sale to developer
under negotiation ☐

Site not actively
being marketed ☒

PART C Site Progress

Will Housing completions begin on site before April 2023?	Yes
Planning Status at 31 March 2018:	Outline planning permission
Update on Planning Status:	See below

Site Progress cont..

Full/reserved matters status: approved, applied for, when planned to be submitted	
Details of Discharge of conditions status: submitted	
Information on Constraints: Actions needed before completions can be achieved	
Access/transport:	
Ground conditions/ contamination:	
Drainage (SUDS, flood prevention etc):	
Land ownership:	
Other constraints (describe), including market:	Need a mini Masterplan to deal with housing/neighbourhood shops and public open space

Total/estimated total site capacity	268
Dwellings built as at 31 March 2018	205
Outstanding capacity as at 31 March 2018	63
Forecast completions Year 1: April 2018/March 2019	
Forecast completions Year 2: April 2019/March 2020	
Forecast completions Year 3: April 2020/March 2021	
Forecast completions Year 4: April 2021/March 2022	
Forecast completions Year 5: April 2022/March 2023	

Other developer/site promoter/landowner comments	Current discussions with LPA case officer Neil Jones to combine this application with the provision of Neighbourhood Shops
(Internal use)	Discussions with LPA taking place on proposed mixed use development on remaining, final phase of largely completed strategic site (Land south of Maltings Lane)

Return by Friday 7th December 2018 to:

PlanningPolicy@braintree.gov.uk

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Please return forms by Friday 7th December 2018

Review of Housing Sites Identified in the 5 Year Supply 2018-2023

The National Planning Policy Framework (July 2018) requires local planning authorities to identify and update annually a supply of specific deliverable sites to be measured against their housing requirements (paragraph 73). As part of this process, local planning authorities are required to engage with developers and others who have an impact on delivery (see paragraph 74).

As you represent one or more of these sites, we would appreciate you taking the time to fill out the below form. Please complete a separate form for each site.

This form can be returned electronically to planningpolicy@braintree.gov.uk or in hard copy if necessary to: Planning Policy, Braintree District Council, Causeway House, Bocking End, Braintree, CM7 9HB.

This form has three parts: Part A – Developer/Company/promoter Details, Part B - Site details and Part C – Site Progress

PART A Developer/Promoter Details

Contact Name:	Kevin Coleman, agent Phase 2 Planning & Development Ltd
Position:	Mersea Homes Ltd And Hills Residential Ltd
Organisation:	
E-mail Address:	
Telephone Number:	

PART B Site Details (please use separate form for each site)

Site Address/Location:	Site 52 Land West of Panfield Lane Braintree
Planning application reference(s):	BTE/15/1319

Is the site:

Owned by Developer	<input type="checkbox"/>	Site Actively being marketed	<input type="checkbox"/>
Sale to developer under negotiation	<input checked="" type="checkbox"/>	Site not actively being marketed	<input type="checkbox"/>

PART C Site Progress

Will Housing completions begin on site before April 2023?	Yes
Planning Status at 31 March 2018:	Without permission; adopted Local Plan Allocation, hybrid application for: 411 homes outline; plus 189 homes full
Update on Planning Status:	Planning application planned to be put before Planning Committee Spring 2019

Site Progress cont..

Full/reserved matters status: approved, applied for, when planned to be submitted	Hybrid application submitted
Details of Discharge of conditions status: submitted	
Information on Constraints: Actions needed before completions can be achieved	
Access/transport:	
Ground conditions/ contamination:	
Drainage (SUDS, flood prevention etc):	
Land ownership:	
Other constraints (describe), including market:	

Total/estimated total site capacity	600
Dwellings built as at 31 March 2018	0
Outstanding capacity as at 31 March 2018	600
Forecast completions Year 1: April 2018/March 2019	0
Forecast completions Year 2: April 2019/March 2020	0
Forecast completions Year 3: April 2020/March 2021	25
Forecast completions Year 4: April 2021/March 2022	100
Forecast completions Year 5: April 2022/March 2023	100

Other developer/site promoter/landowner comments	Assumed programme is for infrastructure start on site before the end of 2019, residential development starting in 2020 on the hybrid/detailed element, with 25 completions second half of 2020, followed by approx. 100 per annum thereafter. Assuming of course that we actually get planning permission 1st half of 2019.
(Internal use)	

Return by Friday 7th December 2018 to:

PlanningPolicy@braintree.gov.uk

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EP4

Smith, Nicola

From: Dawn Brodie [REDACTED]
Sent: 16 April 2021 16:38
To: Bowerman, Emma
Subject: RE: P21/S0112/PEJ and P17/S3952/O - Hale Road, Benson

Sorry Emma,

I was trying to speak to the client.

Yes please use the latest delivery information we provided you with. In terms of pre-app we don't really have an issue advising that you are aware that we are progressing the reserved matters application despite the outline having not quite been issued yet.

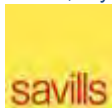
In terms of the time limit extension, I am hopeful that the final matters will be tidied up and agreed well in advance of this date however, to allow for some slippage I am happy to agree this date on behalf of my client. Of course, the sooner we can get this issued the better from our point of view!

Many thanks and have a good weekend.

Dawn

Dawn Brodie
Associate Director
Planning

Savills, Wytham Court, 11 West Way, Oxford OX2 0QL



Tel [REDACTED]



Before printing, think about the environment

From: Bowerman, Emma [mailto:Emma.Bowerman@southandvale.gov.uk]
Sent: 16 April 2021 16:26
To: Dawn Brodie <[REDACTED]>
Subject: FW: P21/S0112/PEJ and P17/S3952/O - Hale Road, Benson

EXTERNAL EMAIL: Be cautious when opening attachments or clicking links

Hi Dawn

I have worked through the info we have and I can see that you already responded to us on delivery (attached). So sorry to have asked again. I will suggest we increase delivery rates to 30 in 2024/25 and 30 2025/26 as per your email on 8 March 2021.

I would be grateful for a response to the other two matters.

With kind regards

Emma

Emma Bowerman
Principal Major Applications Officer
Planning
South Oxfordshire and Vale of White Horse District Councils
Direct dial: 07717 150603
Email: emma.bowerman@southandvale.gov.uk
Visit us at: www.southoxon.gov.uk and www.whitehorsedc.gov.uk

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Due to the Coronavirus outbreak our offices continue to be closed, therefore we are all working remotely. Due to the current circumstances our responses will take longer. Your patience is appreciated.

From: Bowerman, Emma
Sent: 16 April 2021 11:31
To: Dawn Brodie [REDACTED]
Subject: RE: P21/S0112/PEJ and P17/S3952/O - Hale Road, Benson

Many thanks Dawn – I will get this over to my manager for final sign off so if there is anything to resolve, we can do this before the S106 is complete.

I also had a quick query in terms of the delivery of this site, as we have an appeal coming up where our five year land supply is being challenged and this is one of the sites where the Appellant is questioning delivery – extract below from their proof (attached):

- a) **Site: 1929 Benson NDP: Site BEN 2 (52 dwellings).**
- 5.2 This Site was allocated in Benson NDP and the outline application has remained undetermined since 2017 (P17/S3952/O)
- 5.3 The Council's trajectory is based on developer's delivery intentions.
Appellants Commentary
- 5.4 No Planning Permission has been granted. The target date for decision 20th April 2018 and there is no activity recorded on the application since 2018.
- 5.5 Reduce supply by 52 dwellings.

The council's housing land supply statement has this site down as delivering 26 homes in 2023/24 and 26 homes in 2024/25 and it states that this trajectory is based on the developers delivery intentions. Can you please confirm that this still accords with your expected delivery rates?

Also, I thought it might be prudent for us to agree a new target decision date for P17/S3952/O, to reflect the timeframes that we are working towards to complete the S106 and grant outline planning permission. Can you please agree to extend the target decision date for P17/S3952/O to 1 June 2021?

And finally, would it be acceptable to you / your client for the council to refer to the fact that we have engaged in pre-application discussions for the subsequent Reserved Matters application? We would not need to attach our pre-application response, which at the moment is retained as confidential, but will be publicly available when a Reserved Matters application is submitted. It would simply involve referring to the dates of your pre-application request.

I would be grateful if you could get back to me on these three matters as soon as possible due to the tight timeframes involved in the appeal.

Kind regards

Smith, Nicola

From: [REDACTED]
Sent: 12 March 2021 11:52
To: Mircheva, Yoanna
Cc: Sandith, Richard
Subject: FW: Site delivery information

Morning Yoanna

Please see below a completed housing trajectory for Newnham Manor (highlighted in yellow).

Kind regards

Arron Twamley BA (Hons) Dip TP MRTPI
Director ATP Ltd

Paddock Barn, Buckland, Oxfordshire, SN7 8PY



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From: Mircheva, Yoanna <Yoanna.Mircheva@southandvale.gov.uk>
Sent: 01 March 2021 15:29
To: [REDACTED]
Cc: Sandith, Richard <richard.sandith@southandvale.gov.uk>
Subject: Site delivery information

Dear Arron

South Oxfordshire District Council is updating its housing trajectory for sites. As part of this process we are updating the projected delivery rate of permitted and allocated sites. To assist the Council with this process, can you please provide the projected delivery rate for the site:

- Land to the south of Newnham Manor, Crowmarsh Gifford Planning reference P16/S3852/FUL.

Can you please provide the projected construction delivery rate by financial year (1st April to 31st March):

Year	2021/22	2022/23	2023/24	2024/25	2025/26		
No. of dwellings completed	0	30	40	30	x		

The projected delivery rate should be as realistic as possible, taking account of time to secure planning permission and site preparation, therefore can you also provide details on the following, if applicable:

- estimated timeframes for progressing the site through any further full or reserved matters applications;

We anticipate the planning application will be taken back to planning committee late spring and the completion of the S106 shortly thereafter. Although a hybrid planning application the housing will benefit from full planning consent.

- estimated timeframes for progressing discharge of conditions;

We would ensure the planning conditions are submitted for determination by SODC within the Summer 2021

- estimated timeframes for progressing the signing of S106;

Completion by early Summer 2021

- site preparation or whether the site is under construction, and if so the number of completions;

n/a

- whether there is a developer(s) on board;

The applicant is the developer.

- is the site being marketed; and/or

n/a

- any site constraints that could impact the delivery of the site.

None.

- If applicable, how many self-build or custom build plots will be provided on the site.

None.

- If applicable, how many gypsy and traveller pitches will be provided on the site.

None.

We understand that circumstances are difficult at the moment, but it would be greatly appreciated if you could provide at least an estimated delivery rate **by end of play 12 March** please.

If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

If you have any queries, please do not hesitate to contact me.

Best wishes,

Yoanna Mircheva
Enquires Officer/ Assistant Planning Officer
Planning Policy
South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk

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Thank you for your understanding.

Smith, Nicola

From: Grant Williams [REDACTED]
Sent: 15 April 2021 15:12
To: Moule, Phil
Cc: Jason Cross; Moss, Lisa; Scotting, Cathie
Subject: RE: 17S19 - Land north east of Didcot - P15/S2902/O

Hi Phil,

Keeping well thanks.

Based on current information and assumed run rate, the following applies.
This will be updated on a regular basis in line with occupations which we submit.

- **Completions to date: 45**
- **Completions by End of 2021: 95**
- **Completions by End of 2022: 173**
- **Completions by End of 2023: 251**
- **Completions by End of 2024: 330**
- **Completions by End of 2025: 408**

Kind Regards,

Grant Williams
Engineer

t. [REDACTED]



The Spirella Building, Bridge Road, Letchworth Garden City, SG6 4ET

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From: Moule, Phil <Phil.Moule@southandvale.gov.uk>
Sent: 15 April 2021 14:04
To: Grant Williams [REDACTED]
Cc: Jason Cross [REDACTED]; Moss, Lisa <lisa.moss@southandvale.gov.uk>; Scotting, Cathie <Cathie.Scotting@southandvale.gov.uk>
Subject: FW: 17S19 - Land north east of Didcot - P15/S2902/O
Importance: High

Hi Grant,

Hope you are well.

In addition to the number of completions to date, please could you provide the projected completions over the next 5 years. The most recent information we have for (Croudace) Didcot NE is shown below, but I do not think this can be correct as (i) you have completions already and (ii) you will have projected completions between now and 2024/2025.

Land Suppl	Site Name	Settlement (parish)	Major or	Detailed permission in	Outlin plan
1009	Land to the North East of Didcot	Didcot	Major	No	P15

If you could provide your projected completions that would be greatly appreciated. It is needed for a report, so if you could advise by Monday that would be great.

Many thanks in advance,

Phil

Phil Moule MRTPI
Principal Major Applications Officer
South Oxfordshire District Council and Vale of White District Council
Tel: 01235 422600
Email: phil.moule@southandvale.gov.uk
Visit us at www.southoxon.gov.uk and www.whitehorsedc.gov.uk

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From: Grant Williams <[REDACTED]>
Sent: 24 March 2021 16:55
To: Moss, Lisa <lisa.moss@southandvale.gov.uk>
Cc: Jason Cross <[REDACTED]>; Ken Armstrong <[REDACTED]>
Subject: RE: 17S19 - Land north east of Didcot - P15/S2902/O

Hi Lisa,

Just wanted to confirm with our Sales Director.

Smith, Nicola

From: Emily Ford <[REDACTED]>
Sent: 09 March 2021 09:03
To: Mircheva, Yoanna
Cc: Ben Stephenson; Sam Gammon
Subject: RE: Site delivery information

Categories: Green Category

Dear Yoanna

Further to your email below, I am pleased to provide the following information in respect of projected delivery on the Homes England land at Didcot Gateway South.

Year	2021/22	2022/23	2023/24	2024/25	2025/26	TOTAL
No. of dwellings completed			38	53	53	144

The above is based on an outline planning application being submitted in Spring 2021, with consent secured in October 2021. Homes England are anticipating tendering for delivery partners in 2021 with a developer to be appointed in May/June 2022. Reserved matters applications are anticipated during 2022, with consent secured by early 2023. On that basis, construction is anticipated to start in Spring 2023.

I trust this assists. Please do not hesitate to contact me if any further information would be of use.

Kind regards,

Emily Ford
Senior Planner

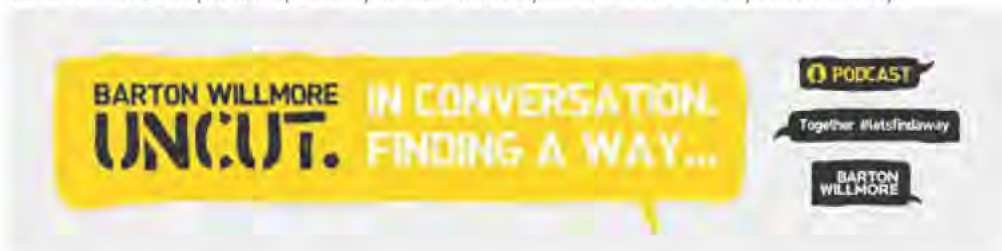


DDI: [REDACTED]
The Blade, Abbey Square, Reading, Berkshire, RG1 3BE

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From: Mircheva, Yoanna <Yoanna.Mircheva@southandvale.gov.uk>
Sent: 08 March 2021 15:05
To: Emily Ford <[REDACTED]>
Subject: FW: Site delivery information
Importance: High

Dear Emily,

Smith, Nicola

From: Colin Campbell [REDACTED]
Sent: 12 March 2021 10:45
To: Mircheva, Yoanna
Subject: RE: Site delivery information

Yoanna

Please see below

Regards

Colin

Colin Campbell
Head of Planning
[REDACTED]



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From: Mircheva, Yoanna <Yoanna.Mircheva@southandvale.gov.uk>
Sent: 08 March 2021 13:40
To: Colin Campbell [REDACTED]
Subject: FW: Site delivery information
Importance: High

Dear Colin,

Please see my previous email. If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

Best wishes,

Yoanna Mircheva
Enquires Officer/ Assistant Planning Officer
Planning Policy
South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk
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Please be aware that some of our staff may be redeployed to other roles where necessary to assist and deal with the Coronavirus outbreak.

Thank you for your understanding.

From: Mircheva, Yoanna
Sent: 01 March 2021 15:34
To: Colin Campbell <[REDACTED]>
Cc: Sandith, Richard <Richard.Sandith@southandvale.gov.uk>
Subject: Site delivery information

Dear Colin

South Oxfordshire District Council is updating its housing trajectory for sites. As part of this process we are updating the projected delivery rate of permitted and allocated sites. To assist the Council with this process, can you please provide the projected delivery rate for the site:

- Land West of Marley Lane, Chalgrove. Planning reference P17/S0094/O.

Can you please provide the projected construction delivery rate by financial year (1st April to 31st March):

Year	2021/22	2022/23	2023/24	2024/25	2025/26		
No. of dwellings completed		70	70	60			

The projected delivery rate should be as realistic as possible, taking account of time to secure planning permission and site preparation, therefore can you also provide details on the following, if applicable:

- estimated timeframes for progressing the site through any further full or reserved matters applications; **RM's approved March 2021**
- estimated timeframes for progressing discharge of conditions; **pre-comm conditions discharged April**
- estimated timeframes for progressing the signing of S106; **n/a**
- site preparation or whether the site is under construction, and if so the number of completions; **n/a**
- whether there is a developer(s) on board; **agreement in place to sell to Ridgpoint Homes who have RM's submitted**
- is the site being marketed; and/or **see above**
- any site constraints that could impact the delivery of the site. **no**
- If applicable, how many self-build or custom build plots will be provided on the site. **none**
- If applicable, how many gypsy and traveller pitches will be provided on the site. **none**

We understand that circumstances are difficult at the moment, but it would be greatly appreciated if you could provide at least an estimated delivery rate **by end of play 12 March** please.

If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

If you have any queries, please do not hesitate to contact me.

Best wishes,

Yoanna Mircheva
Enquires Officer/ Assistant Planning Officer
 Planning Policy
 South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk
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Please be aware that some of our staff may be redeployed to other roles where necessary to assist and deal with the Coronavirus outbreak.

Thank you for your understanding.

Scotting, Cathie

From: Eastwood, Stephanie (Avison Young - UK)
Sent: 12 March 2021 12:58
To: Mircheva, Yoanna
Cc: Gardner, Robert (Avison Young - UK); Ward, Louisa (Avison Young - UK)
Subject: FW: Site delivery information - OBU Wheatley Campus

Hi Yoanna

I hope you are well.

Further to your email below we have reviewed the housing delivery trajectory for the Wheatley Campus site following the outcome of the appeal in April last year based on what we consider to be reasonable assumptions from the information currently available, noting that my client will be disposing of the site to a developer to construct and deliver the scheme.

Please see below our updated housing trajectory:

2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029
-	-	76	92	92	92	92	56

CBRE has been appointed by the University to market and dispose of the site. It expects formal marketing to commence in late spring and for the sale of the site to be completed by the end of the summer this year. However, there is already significant interest in the site from multiple house builders.

We would assume that a lead in of c. 16 months be allowed for the approval of reserved matters and discharge of pre-commencement conditions in relation to the first phase of development by the housebuilder before a start on site in around December 2022. Following site preparation, it is anticipated that the first dwelling could then be complete and occupied by around June 2023.

The trajectory is based on the assumption that development will commence in two phases on the areas of the site where there are no significant existing University buildings that would need to be demolished whilst the University continues to occupy certain buildings within the centre of the site in the short-term. The University would vacate the small number of buildings that it continues to occupy in the main body of the campus and demolition works would take place whilst the initial phases of development are under construction and subsequent phases of development would follow.

At this stage, it is anticipated that there would be two sales outlets on site. It is expected that these would each deliver approx. 2.5 market sales per month (i.e. 60 dwellings per annum across the two outlets). As affordable housing would be pepper-potted through the site and be built out contiguously with the private sale dwellings. We assume that an additional approx. 32 affordable dwellings per annum would be delivered based on the proportion of affordable housing secured as part of the consent (34.5%). This would give a total annual delivery rate of c. 92 dwellings (in a full year) as set out above.

Hopefully this is of assistance and is all clear, however, please let us know if you have any queries.

Many thanks,

Steph

Stephanie Eastwood
Associate Director


3 Brindleyplace, Birmingham, B1 2JB

From: Mircheva, Yoanna <Yoanna.Mircheva@southandvale.gov.uk>

Sent: 01 March 2021 17:00

To: Eastwood, Stephanie (Avison Young - UK) [REDACTED]; Gardner, Robert (Avison Young - UK) [REDACTED]

Cc: Sandith, Richard <richard.sandith@southandvale.gov.uk>

Subject: Site delivery information

External Sender

Dear Stephanie and Robert,

South Oxfordshire District Council is updating its housing trajectory for sites. As part of this process we are updating the projected delivery rate of permitted and allocated sites. To assist the Council with this process, can you please provide the projected delivery rate for the site:

- Land at Wheatley campus, Oxford Brookes University.

Can you please provide the projected construction delivery rate by financial year (1st April to 31st March):

Year	2021/22	2022/23	2023/24	2024/25	2025/26		
No. of dwellings completed							

The projected delivery rate should be as realistic as possible, taking account of time to secure planning permission and site preparation, therefore can you also provide details on the following, if applicable:

- estimated timeframes for progressing the site through any further full or reserved matters applications;
- estimated timeframes for progressing discharge of conditions;
- estimated timeframes for progressing the signing of S106;
- site preparation or whether the site is under construction, and if so the number of completions;
- whether there is a developer(s) on board;
- is the site being marketed; and/or
- any site constraints that could impact the delivery of the site.
- If applicable, how many self-build or custom build plots will be provided on the site.
- If applicable, how many gypsy and traveller pitches will be provided on the site.

We understand that circumstances are difficult at the moment, but it would be greatly appreciated if you could provide at least an estimated delivery rate **by end of play 12 March** please.

If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

If you have any queries, please do not hesitate to contact me.

Best wishes,

Yoanna Mircheva
Enquires Officer/ Assistant Planning Officer
Planning Policy

South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk

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Smith, Nicola

From: Smith, Nicola
Sent: 19 April 2021 13:00
To: Smith, Nicola
Subject: FW: URGENT Lower Shiplake - Reserved matters pursuant to P18/S3210/O

From: Taylor-Drake, Charlotte (Avison Young - UK) [REDACTED] >
Sent: 16 April 2021 12:17
To: Smith, Tracy <tracy.smith@southandvale.gov.uk>
Cc: Stockall, Peter (Avison Young - UK) [REDACTED] >
Subject: RE: URGENT Lower Shiplake - Reserved matters pursuant to P18/S3210/O

Hi Tracy

I do not have a specific phasing plan but, yes, it is proposed to construct, complete and occupy the development within the next 5 years.

Kind regards

Charlotte

Charlotte Taylor-Drake

Associate Director, Planning Development and Regeneration

[REDACTED]

[REDACTED] Smith, Tracy <tracy.smith@southandvale.gov.uk>
Sent: 16 April 2021 11:24
To: Taylor-Drake, Charlotte (Avison Young - UK) [REDACTED] >
Cc: Stockall, Peter (Avison Young - UK) [REDACTED]
Subject: Re: URGENT Lower Shiplake - Reserved matters pursuant to P18/S3210/O

External Sender

Many thanks Charlotte, do they have phasing plan for build out.
Would it be constructed and completed within the next 5 years?
Many thanks.
T

Tracy Smith
Principal Planning Appeals Officer
South Oxfordshire and Vale of White Horse District Councils
Mobile: 07717 271927
Email: tracy.smith@southandvale.gov.uk

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I AM THEN ON LEAVE AND WILL RETURN TO THE OFFICE ON TUESDAY 18 MAY

From: Taylor-Drake, Charlotte (Avison Young - UK) [REDACTED] >
Sent: 16 April 2021 11:16
To: Smith, Tracy <tracy.smith@southandvale.gov.uk>
Cc: Stockall, Peter (Avison Young - UK) <[REDACTED]>
Subject: RE: URGENT Lower Shiplake - Reserved matters pursuant to P18/S3210/O

Hi Tracy

I can confirm that the site has been bought from RV with the intention to build it out and deliver the scheme in line with the outline planning permission. The operator will be ARCO accredited as an operator of a retirement villages with 24/7 care and facilities. The intention is to submit reserved matters/discharge planning conditions with a view to commence development in Q1 2022.

I hope that helps but please let me know if you have any queries.

Kind regards

Charlotte

Charlotte Taylor-Drake
Associate Director, Planning Development and Regeneration

From: Smith, Tracy <tracy.smith@southandvale.gov.uk>
Sent: 16 April 2021 10:23
To: Taylor-Drake, Charlotte (Avison Young - UK) [REDACTED]
Cc: Stockall, Peter (Avison Young - UK) [REDACTED]
Subject: Re: URGENT Lower Shiplake - Reserved matters pursuant to P18/S3210/O

External Sender

**2244 Land to the east of Reading Road Lower Shiplake RG9 4BG Shiplake
P18/S3210/O (65 dwellings)**

5.58 Site has outline planning permission (P18/S3210/O) granted on appeal.

5.59 The Council's trajectory based on officer's assessment of lead-in times and build out rate analysis.

Appellants Commentary

5.60 The Council's assessment relies solely on average lead in times and build out rates.

5.61 There has been no activity in terms of discharging conditions or RM.

5.62 This is not clear evidence of delivery.

5.63 Remove 65 dwellings.

Many thanks Charlotte.

T

Tracy Smith

Principal Planning Appeals Officer

South Oxfordshire and Vale of White Horse District Councils

Mobile: 07717 271927

Email: tracy.smith@southandvale.gov.uk

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I AM THEN ON LEAVE AND WILL RETURN TO THE OFFICE ON TUESDAY 18 MAY

Smith, Nicola

From: Alex Dalton <[REDACTED]>
Sent: 12 March 2021 15:40
To: Mircheva, Yoanna
Cc: [REDACTED]
Subject: Re: FW: Site delivery information (Site B)

Dear Yoanna,

Apologies for the delay in coming back to you. I have filled in the table in your email, and responded to your questions in red.

Please let me know if you need any more information.

Kind regards,

Alex

Alexander Dalton MPlan LRTPI
Project Planner
for and on behalf of:

Howard Sharp and Partners LLP
79 Great Peter Street
Westminster
London
SW1P 2EZ
[REDACTED]

On 08/03/2021 15:55 Mircheva, Yoanna <yoanna.mircheva@southandvale.gov.uk> wrote:

Dear Tom and Alex,

Please see my previous email. If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

Best wishes,

Yoanna Mircheva

Enquires Officer/ Assistant Planning Officer
Planning Policy
South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk

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Thank you for your understanding.

From: Mircheva, Yoanna
Sent: 01 March 2021 17:05
To: [REDACTED]
Cc: Sandith, Richard <Richard.Sandith@southandvale.gov.uk>
Subject: Site delivery information

Dear Tom and Alex,

South Oxfordshire District Council is updating its housing trajectory for sites. As part of this process we are updating the projected delivery rate of permitted and allocated sites. To assist the Council with this process, can you please provide the projected delivery rate for the site:

- Watlington NDP: Site B- Land Off Cuxham Road and Willow Close.

Can you please provide the projected construction delivery rate by financial year (1st April to 31st March):

Year	2021/22	2022/23	2023/24	2024/25	2025/26		
No. of dwellings completed		10	30	20	10		

The projected delivery rate should be as realistic as possible, taking account of time to secure planning permission and site preparation, therefore can you also provide details on the following, if applicable:

- estimated timeframes for progressing the site through any further full or reserved matters applications;

RM submission likely this year

- estimated timeframes for progressing discharge of conditions;

Pre-commencement conditions anticipated to be discharged by 2022/23

- estimated timeframes for progressing the signing of S106;

S106 expected to finalise early this year

- site preparation or whether the site is under construction, and if so the number of completions;

Construction has not yet commenced

- whether there is a developer(s) on board;

Terms agreed with interested housebuilder

- is the site being marketed; and/or

- any site constraints that could impact the delivery of the site.

No significant constraints. In terms of timescale, the route of the edge road needs to be finalised to inform the RM submission

- If applicable, how many self-build or custom build plots will be provided on the site.

0

- If applicable, how many gypsy and traveller pitches will be provided on the site.

0

We understand that circumstances are difficult at the moment, but it would be greatly appreciated if you could provide at least an estimated delivery rate **by end of play 12 March** please.

If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

If you have any queries, please do not hesitate to contact me.

Best wishes,

Yoanna Mircheva

Enquires Officer/ Assistant Planning Officer
Planning Policy
South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk

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Please be aware that some of our staff may be redeployed to other roles where necessary to assist and deal with the Coronavirus outbreak.

Thank you for your understanding.

Smith, Nicola

From: Alex Dalton [REDACTED]
Sent: 12 March 2021 15:42
To: Mircheva, Yoanna
Cc: [REDACTED]
Subject: Re: FW: Site delivery information

Dear Yoanna,

I have filled in the table in your email below. Please also see my comments in red.

My mobile is best if you have any queries.

Kind regards,

Alex

Alexander Dalton MPlan LRTPI
Project Planner
for and on behalf of:

Howard Sharp and Partners LLP
79 Great Peter Street
Westminster
London
SW1P 2EZ
[REDACTED]

On 08/03/2021 15:54 Mircheva, Yoanna <yoanna.mircheva@southandvale.gov.uk> wrote:

Dear Tom and Alex,

Please see my previous email. If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

Best wishes,

Yoanna Mircheva

Enquires Officer/ Assistant Planning Officer
Planning Policy
South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk

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Thank you for your understanding.

From: Mircheva, Yoanna

Sent: 01 March 2021 17:06

To: [REDACTED]

Cc: Sandith, Richard <Richard.Sandith@southandvale.gov.uk>

Subject: Site delivery information

Dear Tom and Alex,

South Oxfordshire District Council is updating its housing trajectory for sites. As part of this process we are updating the projected delivery rate of permitted and allocated sites. To assist the Council with this process, can you please provide the projected delivery rate for the site:

- Watlington NDP: Site C- Land off Pyrton Lane.

Can you please provide the projected construction delivery rate by financial year (1st April to 31st March):

Year	2021/22	2022/23	2023/24	2024/25	2025/26		
No. of dwellings completed			25	25	10		

The projected delivery rate should be as realistic as possible, taking account of time to secure planning permission and site preparation, therefore can you also provide details on the following, if applicable:

- estimated timeframes for progressing the site through any further full or reserved matters applications;

RM submission likely this year

- estimated timeframes for progressing discharge of conditions;

Pre-commencement conditions anticipated to be discharged by 2022/23

- estimated timeframes for progressing the signing of S106;

S106 expected to finalise early this year

- site preparation or whether the site is under construction, and if so the number of completions;

Construction has not yet commenced

- whether there is a developer(s) on board;

Terms agreed with interested housebuilder

- is the site being marketed; and/or

- any site constraints that could impact the delivery of the site.

No significant constraints. In terms of timescale, the route of the edge road needs to be finalised to inform the RM submission

- If applicable, how many self-build or custom build plots will be provided on the site.

0

- If applicable, how many gypsy and traveller pitches will be provided on the site.

0

We understand that circumstances are difficult at the moment, but it would be greatly appreciated if you could provide at least an estimated delivery rate **by end of play 12 March** please.

If you are not the correct contact, please either forward this email on to the correct person with me cc'd or please pass on their contact details.

If you have any queries, please do not hesitate to contact me.

Best wishes,

Yoanna Mircheva

Enquires Officer/ Assistant Planning Officer
Planning Policy
South Oxfordshire and Vale of White Horse District Councils

Email: yoanna.mircheva@southandvale.gov.uk

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Thank you for your understanding.

Smith, Nicola

From: Nick McEntyre <[REDACTED]>
Sent: 19 April 2021 14:29
To: Emma Runesson; Smith, Nicola
Subject: Re: Land at Marley lane, Chalgrove

Nicola,

This is confirmed.

Please let me know if you require anything further.

Kind Regards

Nick McEntyre
Managing Director

RIDGEPOINT HOMES LTD

Terriers House | 201 Amersham Road | High Wycombe | Buckinghamshire | HP13 5AJ

M: [REDACTED]
[REDACTED]

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From: Smith, Nicola <Nicola.Smith@Southandvale.gov.uk>
Sent: Monday, April 19, 2021 11:52:58 AM
To: Nick McEntyre [REDACTED]
Subject: Land at Marley lane, Chalgrove

Dear both,

I hope you are well,

As I have mentioned previously, I am involved in a Public Inquiry which starts next week, the appellants have questioned our five year land supply and yours is one of the sites where the Appellant is questioning delivery – extract below from their proof :

I) 1639 Land West of Marley Lane, Chalgrove (P17/S0094/O) 10/04/2018 (200 dwellings)

6.2 Site has outline planning permission.

6.3 The Council's trajectory is based on developer delivery intentions; RM approval Q3 2020 and start on site Q4 2020.

Appellants Commentary

6.4 While there has been activity in discharging conditions it is noted that a further OL application was submitted by Hill Property Investments on the 18 December 2020 on the grounds that:

Given the ongoing uncertainty regarding COVID, the applicants consider it prudent to submit this application in case for any reason the extant application should expire on 1st May 2021.

6.5 The reserved matters are still outstanding the landowner has expressed doubts regarding the implementation of the consent in a timely manner. Furthermore, the lead in time and build out rate is more optimistic than the councils evidence base (CD:K32 appendix C page 57).

Utilising this evidence would suggest that there will be at least a year between RM approval and first completions so first completion will be 2022/3 build out rate of 52 dpa as per Interim Report would deliver 156 dwellings not 200 and this would mean a reduction of 44 dwellings.

6.6 Reduce supply by 44 dwellings.

The council's housing land supply statement has this site down as delivering 20 homes in 2021/22, 90 in 2022/23 and 90 in 2023/24 and it states that this trajectory is based on the developers delivery intentions. I would be extremely grateful if could please confirm as soon as possible that this accords with your expected delivery rates? I am currently preparing a rebuttal statement so I would be grateful for a response as soon as possible.

Kind Regards

Nicola

Nicola Smith

Principal Major Applications Officer

Planning Service

Vale of White Horse District Council and South Oxfordshire District Council

T: 01235 422600

E: Nicola.smith@southandvale.gov.uk

A : 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB

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EP5

Appendix 3

Information from Developers/Landowners relating to Expected Delivery of Housing from Disputed Large Sites within the District

Chris Wood

From: Thomas Corbin <[REDACTED]>
Sent: 12 September 2022 17:28
To: Chris Hargraves
Cc: Paul Comerford
Subject: RE: Letter to Prior and Partners re Salt Cross Garden Village
Attachments: Salt Cross Garden Village (September 2022 housing trajectory).doc

Hi Chris,

Sorry slightly behind Friday's deadline but please see attached updated housing trajectory for the Salt Cross Garden Village. You will note this is behind the 150 homes previously assumed in the Council's 5yhls paper but consistent with the latest AAP phasing and reinforced by the fact that the Applicant and Landowners are committed to delivering homes on this site as soon as the submitted OPA is determined. We have included some key assumptions in the attached regarding targeting milestones. In all honesty, we believe this could be expedited through the renewed focus on the OPA's determination and on-going Section 106 negotiations but have updated to attached to represent current likelihoods.

The estimate for resolution to grant (RTG) in the Salt Cross phasing report (EV36, March 2022) aimed for an August 2022 RTG (extract below) resulting in completions in the second half of 2026. Despite currently assuming a delayed RTG (which is now targeted for the end of this year) is achieved, we would hope we could retain a mid-2023 section 106 agreement through collaborative working over the next few months.

Kind regards,

Tom

Table 1: Assumed lead-in period to first completions		
Item	Description	Potential timing
1.	WODC resolution to grant outline planning permission.	June - August 2022
2.	Completion of section 106 agreement(s).	June - August 2023
3.	Grant of outline planning permission.	June - August 2023
4.	Discharge pre-commencement conditions.	October - December 2023
5.	Initial infrastructure works; i.e. to open up the site (see Note 1).	January - June 2024
6.	Pre-planning and marketing of first sub-phase.	January - June 2024
7.	Conditional contract with first housebuilder.	June - December 2024
8.	Phase 1a - pre-application design and consultation work.	January - March 2025
9.	Submission of first sub-phase reserved matters application ("RMA").	May - July 2025
10.	Determination of first sub-phase RMA.	August - October 2025
11.	Discharge pre-commencement conditions.	October - December 2025
12.	Mobilization.	January - March 2026
13.	Commencement on site.	April - June 2026
14.	First completions.	Second half of 2026
Notes:		
1. The overall timeline may need to be extended to allow more time for design work on and subsequent approval of enabling infrastructure RMAs; e.g. the first sections of the spine road.		

Thomas Corbin
Associate

t: [REDACTED]
m: [REDACTED]

w: priorandpartners.com

a: 70 Cowcross Street, London, EC1M 6EJ



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From: Chris Hargraves <Chris.Hargraves@westoxon.gov.uk>
Sent: 31 August 2022 13:03
To: Paul Comerford [REDACTED]
Cc: Thomas Corbin [REDACTED]
Subject: Letter to Prior and Partners re Salt Cross Garden Village

Dear Paul

I hope you are well. Please find attached a letter in relation to Salt Cross Garden Village in the context of anticipated housing land supply.

Whilst I appreciate that the information being sought is to a large extent dependent on the passage of the site through the planning process, I am hopeful that you will be able to give us a realistic picture of anticipated delivery timescales from your perspective.

I look forward to hearing from you at your earliest convenience. Do let me know if you need any further information or clarification.

Kind regards

Chris Hargraves
Planning Policy Manager
West Oxfordshire District Council

Chris Hargraves
Planning Policy Manager - West Oxfordshire District Council



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Planning and Strategic Housing

Reply to : Chris Hargraves
Tel : 01993 861686
Email : chris.hargraves@westoxon.gov.uk

Elmfield
New Yatt Road,
WITNEY,
Oxfordshire,
OX28 1PB,
Tel: 01993 861000
www.westoxon.gov.uk



Your Ref :
Our Ref :
Date : 31 August 2022

Dear Paul

West Oxfordshire District Council Housing Land Supply Position Update (2022 – 2027) - Information required in relation to Salt Cross Garden Village

I am writing to inform you that the District Council is in the process of updating its Housing Land Supply (HLS) Position Statement for the period 1st April 2022 – 31st March 2027.

The update will take account of housing completions from 1st April 2011 – 31st March 2022 and extant planning permissions and other commitments as of 1st April 2022.

As you will be aware, where sites have outline planning permission only or are allocated in a development plan, to be considered deliverable, the Council must have clear evidence that housing completions will begin on site within five years.

As such, I would be grateful if you could complete the pro-forma overleaf, taking into account the current stage which Salt Cross Garden Village has reached in the planning process and the anticipated build trajectory.

As you will see, the pro-forma extends beyond the 5-year period 2022 – 2027 reflecting the fact that for a number of sites, completions are likely to extend beyond 2027.

If you are able to complete the trajectory for the entire build out of your site that would be helpful, not least because this information will also help to inform our forthcoming Local Plan review.

If you are able to provide any additional information in support of your anticipated trajectory (including assumed timings around grant of outline planning permission, Section 106 discussions, reserved matters, discharge of conditions etc.) that would be helpful.

I look forward to hearing from you at your earliest convenience. I appreciate it is holiday season and that you may be unable to respond immediately but if you could provide the requested information no later than Friday 9 September or sooner if possible, I would be grateful.

Thank you in advance for your assistance with this important matter. If you wish to discuss or require any further information or clarification, please let me know as soon as possible.
Yours sincerely



Chris Hargraves
Planning Policy Manager

Anticipated development trajectory – Salt Cross Garden Village

	1 st April 2022 – 31 st March 2023	1 st April 2023 – 31 st March 2024	1 st April 2024 – 31 st March 2025	1 st April 2025 – 31 st March 2026	1 st April 2026 – 31 st March 2027	1 st April 2027 – 31 st March 2028	1 st April 2028 – 31 st March 2029	1 st April 2029 – 31 st March 2030	1 st April 2030 – 31 st March 2031	1 st April 2031 – 31 st March 2032	1 st April 2032 – 31 st March 2033	1 st April 2033 – 31 st March 2034	1 st April 2034 – 31 st March 2035	1 st April 2035 – 31 st March 2036	1 st April 2036 – 31 st March 2037
Number of anticipated housing completions (per annum)					50	70	135	160	180	195	195	210	210	210	195
Cumulative completions for reference					50	120	255	415	595	790	985	1,195	1,405	1,645	1,810

Additional notes (please set out here any further information in support of the above assumptions)

- Grosvenor's outline planning application (20/01734/OUT) was submitted in July 2020. Although the Salt Cross AAP is yet to be formally adopted, we believe the Inspector finding the AAP sound subject to main modifications provides weight to the AAP as a material consideration in the determination of the OPA a strong indicator of the deliverability of the OPA. Grosvenor remain committed to the delivery of the Garden Village and eagerly await the positive determination of the submitted planning application.
- The above housing trajectory is based on the below estimated milestones and the trajectory within the Salt Cross Phasing report (March 2022):
 - December 2022 - Salt Cross AAP adopted
 - December 2022 / January 2023 - Resolution to grant
 - August 2023 – Section 106 signed
 - 2024/25: Early phase RMA(s) produced, submitted and approved
 - 2025/26: Construction starts on site
 - Late 2026: First completions

Chris Wood

From: Ashley Maltman [REDACTED]
Sent: 11 September 2022 23:28
To: Chris Hargraves
Cc: Roger File; Nigel McGurk
Subject: FW: Letter to Blenheim re Land at Hill Rise and Land North of Banbury Road
Attachments: Letter to Blenheim re Land at Hill Rise and Land North of Banbury Road (003).doc

Hi Chris,

Thanks for your e-mail in relation to our proposals at Hill Rise and Banbury Road, for completeness I have also sought to provide delivery rates on our sites at Eynsham and Park View, Woodstock.

Hill Rise and Banbury Road

See attached completed trajectory for both sites. As you know these are 2 allocated sites and two planning applications are with WODC planning officers for consideration, both originally submitted January 2021. We sent back to officers last week what we hope are final responses that address any concerns they previously had. We are hoping that they will both go to and receive approval at the October Uplands Committee meeting, however, we are yet to hear confirmation of this from Officers.

Hill Rise is a hybrid application, and our current plan is to be on site Q2 2023 - 1st completion Q1 2024 - if a consent is granted at the October planning committee and any s106 concluded rapidly, any reserved matters application will follow for the remainder of the site to allow continuity of delivery on site.

Banbury Road is an outline application, and we would immediately follow with preparing a Reserved Matters application but would not expect to be on site for 12-18 months following grant of outline permission to allow for reserved matters approval and discharge of conditions

Both planning applications have been with officers for a considerable amount of time and hopefully we are in a position where positive recommendations will be forthcoming in October/November 2022. We have invested considerable time and money into these applications and if consents are not forthcoming, for reasons discussed with my colleagues, we will need to review our position and no realistic timeline can be predicted. In such a scenario, we must consider proceeding to appeal as our view is that the determination timescales for both planning applications - which are ambitious proposals for exemplar schemes on 2 allocated sites - have taken far too long.

Eynsham

See below our proposed trajectory, however, in similar vein to Hill Rise and Banbury Road, this is dependent upon the timely determination of the planning application (full planning application) which is to be submitted in Q4 2022:

- 2022-2023
- 2023-2024
- 2024-2025 - 18 dwellings
- 2025-2026 - 35 dwellings
- 2026-2027 – 17 dwellings

Park View, Woodstock

See below our completions expected over the corresponding period.

- 2022-2023 – 70 dwellings
- 2023-2024 - 70 dwellings
- 2024-2025 – 53 dwellings

- 2025-2026 – 42 dwellings

You will also note we now have an interest in North Witney site allocation; however, the consortium's position and trajectory will be conveyed through Tim Burden at Turleys for this site.

If you have any further questions, please don't hesitate to contact me.

Kind regards

Ash

Ashley Maltman
Head of Planning



T: 01865 373903 | M: 07850640593

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From: Chris Hargraves <Chris.Hargraves@westoxon.gov.uk>

Sent: 31 August 2022 13:23

To: Roger File <[REDACTED]>

Subject: Letter to Blenheim re Land at Hill Rise and Land North of Banbury Road

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Roger

I hope you are well. Please find attached a letter in relation to land at Hill Rise and land north of Banbury Road, Woodstock in the context of anticipated housing land supply.

Whilst I appreciate that the information being sought is to a large extent dependent on the passage of the sites through the planning process, I am hopeful that you will be able to give us a realistic picture of anticipated delivery timescales from your perspective.

I look forward to hearing from you at your earliest convenience. Do let me know if you need any further information or clarification.

Kind regards

Chris Hargraves
Planning Policy Manager
West Oxfordshire District Council
Chris Hargraves
Planning Policy Manager - West Oxfordshire District Council



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Planning and Strategic Housing

Reply to : Chris Hargraves
Tel : 01993 861686
Email : chris.hargraves@westoxon.gov.uk

Elmfield
New Yatt Road,
WITNEY,
Oxfordshire,
OX28 1PB,
Tel: 01993 861000
www.westoxon.gov.uk



Your Ref :
Our Ref :
Date : 31 August 2022

Dear Roger

West Oxfordshire District Council Housing Land Supply Position Update (2022 – 2027) - Information required in relation to land at Hill Rise and land north of Banbury Road, Woodstock

I am writing to inform you that the District Council is in the process of updating its Housing Land Supply (HLS) Position Statement for the period 1st April 2022 – 31st March 2027.

The update will take account of housing completions from 1st April 2011 – 31st March 2022 and extant planning permissions and other commitments as of 1st April 2022.

As you will be aware, where sites have outline planning permission only or are allocated in a development plan, to be considered deliverable, the Council must have clear evidence that housing completions will begin on site within five years.

As such, I would be grateful if you could complete the pro-forma overleaf, taking into account the current stage which the sites at Hill Rise and to the north of Banbury Road have reached in the planning process and their anticipated build trajectory.

As you will see, the pro-forma extends beyond the 5-year period 2022 – 2027 reflecting the fact that for a number of sites, completions are likely to extend beyond 2027.

If you are able to complete the trajectory for the entire build out of your sites that would be helpful, not least because this information will also help to inform our forthcoming Local Plan review.

If you are able to provide any additional information in support of your anticipated trajectory (including assumed timings around grant of outline planning permission, Section 106 discussions, reserved matters, discharge of conditions etc.) that would be helpful.

I look forward to hearing from you at your earliest convenience. I appreciate it is holiday season and that you may be unable to respond immediately but if you could provide the requested information no later than Friday 9 September or sooner if possible, I would be grateful.

Thank you in advance for your assistance with this important matter. If you wish to discuss or require any further information or clarification, please let me know as soon as possible.

Yours sincerely



Chris Hargreaves
Planning Policy Manager

Anticipated development trajectory – Land at Hill Rise, Woodstock

	¹ April 2022 – 31 st March 2023	¹ April 2023 – 31 st March 2024	¹ April 2024 – 31 st March 2025	¹ April 2025 – 31 st March 2026	¹ April 2026 – 31 st March 2027	¹ April 2027 – 31 st March 2028	¹ April 2028 – 31 st March 2029	¹ April 2029 – 31 st March 2030	¹ April 2030 – 31 st March 2031	¹ April 2031 – 31 st March 2032	¹ April 2032 – 31 st March 2033	¹ April 2033 – 31 st March 2034	¹ April 2034 – 31 st March 2035	¹ April 2035 – 31 st March 2036	¹ April 2036 – 31 st March 2037
Number of anticipated housing completions (per annum)		12	48	48	48	24									

Additional notes (please set out here any further information in support of the above assumptions)

Anticipated development trajectory – Land north of Banbury Road, Woodstock

	¹ April 2022 – 31 st March 2023	¹ April 2023 – 31 st March 2024	¹ April 2024 – 31 st March 2025	¹ April 2025 – 31 st March 2026	¹ April 2026 – 31 st March 2027	¹ April 2027 – 31 st March 2028	¹ April 2028 – 31 st March 2029	¹ April 2029 – 31 st March 2030	¹ April 2030 – 31 st March 2031	¹ April 2031 – 31 st March 2032	¹ April 2032 – 31 st March 2033	¹ April 2033 – 31 st March 2034	¹ April 2034 – 31 st March 2035	¹ April 2035 – 31 st March 2036	¹ April 2036 – 31 st March 2037
Number of anticipated housing completions (per annum)			24	48	48	48	48	19							

Additional notes (please set out here any further information in support of the above assumptions)

Planning and Strategic Housing

Reply to : Chris Hargraves
Tel : 01993 861686
Email : chris.hargraves@westoxon.gov.uk

Elmfield

New Yatt Road,
WITNEY,
Oxfordshire,
OX28 1PB,
Tel: 01993 861000
www.westoxon.gov.uk



Your Ref :
Our Ref :
Date : 31 August 2022

Dear Tim

West Oxfordshire District Council Housing Land Supply Position Update (2022 – 2027) - Information required in relation to the North Witney Strategic Development Area (SDA)

I am writing to inform you that the District Council is in the process of updating its Housing Land Supply (HLS) Position Statement for the period 1st April 2022 – 31st March 2027.

The update will take account of housing completions from 1st April 2011 – 31st March 2022 and extant planning permissions and other commitments as of 1st April 2022.

As you will be aware, where sites have outline planning permission only or are allocated in a development plan, to be considered deliverable, the Council must have clear evidence that housing completions will begin on site within five years.

As such, I would be grateful if you could complete the pro-forma overleaf, taking into account the current stage which the North Witney SDA has reached in the planning process and the anticipated build trajectory.

As you will see, the pro-forma extends beyond the 5-year period 2022 – 2027 reflecting the fact that for a number of sites, completions are likely to extend beyond 2027.

If you are able to complete the trajectory for the entire build out of your site that would be helpful, not least because this information will also help to inform our forthcoming Local Plan review.

If you are able to provide any additional information in support of your anticipated trajectory (including assumed timings around grant of outline planning permission, Section 106 discussions, reserved matters, discharge of conditions etc.) that would be helpful.

I look forward to hearing from you at your earliest convenience. I appreciate it is holiday season and that you may be unable to respond immediately but if you could provide the requested information no later than Friday 9 September or sooner if possible, I would be grateful.

Thank you in advance for your assistance with this important matter. If you wish to discuss or require any further information or clarification, please let me know as soon as possible.

Yours sincerely

A black rectangular box redacting the signature of Chris Hargraves.

Chris Hargraves
Planning Policy Manager

Anticipated development trajectory – North Witney SDA

	¹ April 2022 – 31 st March 2023	¹ April 2023 – 31 st March 2024	¹ April 2024 – 31 st March 2025	¹ April 2025 – 31 st March 2026	¹ April 2026 – 31 st March 2027	¹ April 2027 – 31 st March 2028	¹ April 2028 – 31 st March 2029	¹ April 2029 – 31 st March 2030	¹ April 2030 – 31 st March 2031	¹ April 2031 – 31 st March 2032	¹ April 2032 – 31 st March 2033	¹ April 2033 – 31 st March 2034	¹ April 2034 – 31 st March 2035	¹ April 2035 – 31 st March 2036	¹ April 2036 – 31 st March 2037
Number of anticipated housing completions (per annum)		25	75	100	150	200	200	200	200	175	75				

Additional notes (please set out here any further information in support of the above assumptions)

Chris Wood

From: Andrew Winstone <[REDACTED]>
Sent: 16 September 2022 12:26
To: Chris Hargraves
Cc: Abby Fettes
Subject: RE: Letter to Bloor Homes re land east of Monahan Way, Carterton
Attachments: Letter to Bloor Homes re land east of Monahan Way, Carterton.doc; Letter to Bloor Homes re land east of Monahan Way, Carterton.pdf

Dear Chris,
Thank you for your e-mail, and apologies for the delay in providing the requested information. Please see attached in Word and pdf formats.
Kind regards,
Andrew Winstone
Planning Manager

Bloor Homes Western

Western House, Furrowfield Park, Tewkesbury, Gloucestershire, GL20 8UR

Tel: [REDACTED]
Em: [REDACTED]



From: Chris Hargraves <Chris.Hargraves@westoxon.gov.uk>
Sent: 31 August 2022 13:11
To: Andrew Winstone <[REDACTED]>
Subject: Letter to Bloor Homes re land east of Monahan Way, Carterton

Dear Andrew

I hope you are well. Abby Fettes kindly provided your contact details and I attach a letter in relation to land east of Monahan Way, Carterton in the context of anticipated housing land supply.

Essentially we would be grateful for an update on your expected timescales for taking the site through to completion. I am aware from Abby that you are looking for some additional numbers on the site so please feel free to reflect that possibility when providing your response.

I look forward to hearing from you at your earliest convenience. Do let me know if you need any further information or clarification.

Kind regards

Chris Hargraves

Planning Policy Manager

West Oxfordshire District Council

Chris Hargraves

Planning Policy Manager - West Oxfordshire District Council



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Planning and Strategic Housing

Reply to : Chris Hargraves
Tel : 01993 861686
Email : chris.hargraves@westoxon.gov.uk

Elmfield

New Yatt Road,
WITNEY,
Oxfordshire,
OX28 1PB,
Tel: 01993 861000
www.westoxon.gov.uk



Your Ref :
Our Ref :
Date : 31 August 2022

Dear Andrew

West Oxfordshire District Council Housing Land Supply Position Update (2022 – 2027) - Information required in relation to land east of Monahan Way, Carterton

I am writing to inform you that the District Council is in the process of updating its Housing Land Supply (HLS) Position Statement for the period 1st April 2022 – 31st March 2027.

The update will take account of housing completions from 1st April 2011 – 31st March 2022 and extant planning permissions and other commitments as of 1st April 2022.

As such, I would be grateful if you could complete the pro-forma overleaf, taking into account the current stage which your site has reached in the planning process and the anticipated build trajectory.

As you will see, the pro-forma extends beyond the 5-year period 2022 – 2027 reflecting the fact that for a number of sites, completions are likely to extend beyond 2027.

If you are able to complete the trajectory for the entire build out of your site that would be helpful, not least because this information will also help to inform our forthcoming Local Plan review.

If you are able to provide any additional information in support of your anticipated trajectory (including assumed timings around grant of outline planning permission, Section 106 discussions, reserved matters, discharge of conditions etc.) that would be helpful.

I look forward to hearing from you at your earliest convenience. I appreciate it is holiday season and that you may be unable to respond immediately but if you could provide the requested information no later than Friday 9 September or sooner if possible, I would be grateful.

Thank you in advance for your assistance with this important matter. If you wish to discuss or require any further information or clarification, please let me know as soon as possible.

Yours sincerely




Chris Hargraves
Planning Policy Manager

Anticipated development trajectory – Land East of Monahan Way, Carterton

	1 st April 2022 – 31 st March 2023	1 st April 2023 – 31 st March 2024	1 st April 2024 – 31 st March 2025	1 st April 2025 – 31 st March 2026	1 st April 2026 – 31 st March 2027	1 st April 2027 – 31 st March 2028	1 st April 2028 – 31 st March 2029	1 st April 2029 – 31 st March 2030	1 st April 2030 – 31 st March 2031	1 st April 2031 – 31 st March 2032	1 st April 2032 – 31 st March 2033	1 st April 2033 – 31 st March 2034	1 st April 2034 – 31 st March 2035	1 st April 2035 – 31 st March 2036	1 st April 2036 – 31 st March 2037
Number of anticipated housing completions (per annum)	119	103	103	103	103	0	0	0	0	0	0	0	0	0	0

Bloor Commentary:

Our current delivery rate to date has been approximately 100 dwellings per annum.

Our forecast completions for 1st April 2022 to 31st March 2023 total 119 dwellings.

The current outline planning permission for the site is for 700 dwellings. Bloor will shortly be submitting a planning application for a further 100 dwellings approximately.

Whilst inevitably there will be some uncertainty as to economic and market conditions going forwards, currently, and assuming we obtain planning permission for the additional 100 dwellings, it is reasonable to forecast the delivery of a further 100 (approx.) dwellings per annum over the four years from 1st April 2023, with site completion by mid-2027.

Chris Wood

From: Wooden, Jonathan Mr (DIO Estates-AOT DH) <Jonathan.Wooden426@mod.gov.uk>
Sent: 07 September 2022 19:40
To: Chris Hargraves
Subject: RE: Letter to MOD re REEMA North

Chris,

In response to your email and letter, our anticipated programme for the development of Service Families Accommodation and private housing on the REEMA North site generates the numbers set out in the table below, although as you recognise these numbers are subject to planning (and other issues):

Anticipated development trajectory – REEMA North, Carterton

	1 st April 2022 – 31 st March 2023	1 st April 2023 – 31 st March 2024	1 st April 2024 – 31 st March 2025	1 st April 2025 – 31 st March 2026	1 st April 2026 – 31 st March 2027	1 st April 2027 – 31 st March 2028	1 st April 2028 – 31 st March 2029	1 st April 2029 – 31 st March 2030	1 st April 2030 – 31 st March 2031	1 st April 2031 – 31 st March 2032	1 st April 2032 – 31 st March 2033
Number of anticipated housing completions (per annum)				100	175						

I hope that helps,

Jon Wooden BSc MBA MCMI MAPM MRICS

Deputy Head Estates (Accommodation Optimisation), Defence Infrastructure Organisation

Army Headquarters | IDL 412 | 2nd Floor | Ramillies Building | Marlborough Lines | Monxton Road | Andover | Hants | SP11 8HJ

Mobile: 07769 648837 | MOD telephone: 94391 3437 | Telephone: 01264 383437 | Email: Role Mailbox: DIOEstates-AODH@mod.gov.uk | Personal Mailbox: Jonathan.Wooden426@mod.gov.uk

From: Chris Hargraves <Chris.Hargraves@westoxon.gov.uk>
Sent: 31 August 2022 12:24
To: Wooden, Jonathan Mr (DIO Estates-AOT DH) <Jonathan.Wooden426@mod.gov.uk>
Subject: Letter to MOD re REEMA North

Dear Jonathan

I hope you are well. Please find attached a letter in relation to the REEMA North site at Carterton in the context of anticipated housing land supply.

Whilst I appreciate that the information being sought is to a large extent dependent on the passage of the site through the planning process, I am hopeful that you will be able to give us a realistic picture of anticipated delivery timescales from your perspective.

I look forward to hearing from you at your earliest convenience. Do let me know if you need any further information or clarification.

Kind regards

Chris Hargraves
Planning Policy Manager
West Oxfordshire District Council

Chris Hargraves
Planning Policy Manager - West Oxfordshire District Council



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Chris Wood

From: Annette Simpkins <[REDACTED]>
Sent: 02 September 2022 12:33
To: Chris Hargraves
Subject: Re: Land at Myrtle Farm, Long Hanborough

Dear Mr Hargraves

Thank you for your email. We have considered the options and would like to retain the land as an allocated housing site, please, as we may want to bring it forward for development sometime in the future.

Many thanks.

Yours sincerely,

Annette Simpkins

Sent from my iPad

On 1 Sep 2022, at 17:56, Chris Hargraves <Chris.Hargraves@westoxon.gov.uk> wrote:

Dear Ms Simpkins

Many thanks for your email. It is very helpful to understand your position. We are about to review our local plan and I wonder if we should look at 'de-allocating' the site if you have no interest in bringing it forward for development.

Perhaps you could let me know if this is something you would like us to further consider or whether you would like to retain it as an allocated housing site to provide some more flexibility in the longer term should your position change?

Kind regards

Chris

From: Annette Simpkins <[REDACTED]>
Sent: 31 August 2022 16:54
To: Chris Hargraves <Chris.Hargraves@westoxon.gov.uk>
Subject: Re: Land at Myrtle Farm, Long Hanborough

Dear Mr Hargraves

Thank you for your email. Our position hasn't changed since last September. We will not be considering the land for development before 2027.

To be honest, Long Hanborough has had 3 developments to absorb in very quick succession, together with the small development currently under construction on the old Oliver's Garage site - another 24 homes. Our local infrastructure is at breaking point and we strongly feel that, in all fairness, we cannot be responsible for further development in the village.

We hope you understand our position.

Yours sincerely

Annette Simpkins

Sent from my iPad

On 31 Aug 2022, at 13:16, Chris Hargraves
<Chris.Hargraves@westoxon.gov.uk> wrote:

Dear Ms Simpkins

I write by way of follow up to my previous email of September last year. I appreciate that you said you would get in touch with us should your position change, but as we are about to update our housing land supply position statement, I thought it would be sensible just to quickly contact you to see if there was any movement regarding the potential release of this site for development.

Our new position statement will cover the 5-year period 2022 – 2027 and will essentially set out how many new homes we anticipate being delivered for particular sites over that timescale.

As such, if you could just provide a further brief update that would be very helpful.

Kind regards

Chris Hargraves

Planning Policy Manager

From: Annette Simpkins <[REDACTED]>
Sent: 24 September 2021 08:01
To: Chris Hargraves <Chris.Hargraves@westoxon.gov.uk>
Subject: Re: Land at Myrtle Farm, Long Hanborough

Dear Mr Hargraves

Thank you for your email. The field in question is currently being farmed by a neighbouring farmer, and we intend that this will continue for the foreseeable future.

Thank you for your interest - we will contact you if our position changes.

Yours sincerely

Annette Simpkins

Sent from my iPad

On 23 Sep 2021, at 14:04, Chris Hargraves
<Chris.Hargraves@westoxon.gov.uk> wrote:

Dear Ms Simpkins

I hope this email finds you well. You will recall from previous correspondence (below) that my colleague Deborah Wyatt contacted you last year regarding land at Myrtle Farm and whether there was any interest in bringing the site forward for development.

As it has been some time since this last exchange, I thought I would seek a further update from you to see if the position remains the same.

As part of its commitment to tackling the climate emergency, the District Council is looking for flagship schemes to demonstrate best practice in terms of building fabric efficiency and the use of renewable energy and I thought this site could be a potential candidate.

We are also about to embark on a review of our local plan and as part of that process will need to consider those sites which are already allocated for development and whether they are realistically likely to come forward or not.

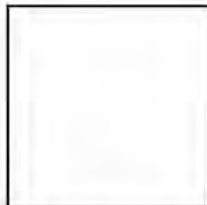
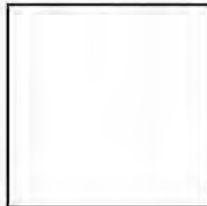
As such, if you do have time to give me a very brief update on your thoughts regarding the site, it would be very much appreciated.

Many thanks in anticipation.

Kind regards

Chris Hargraves
Planning Policy Manager
West Oxfordshire District Council

Chris Hargraves
Planning Policy Manager - West Oxfordshire District Council



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-----Original Message-----

From: Annette Simpkins

[REDACTED]

Sent: 23 June 2020 15:43

To: Deborah Wyatt

Subject: Land at Myrtle Farm, Long Hanborough

Thank you for your letter of 18th June regarding the development of land at Myrtle Farm, Long Hanborough.

My brother and I have also had numerous requests from private developers to sell the land, but we have decided, for the foreseeable future, to leave it as an agricultural field.

As you will know, our village has had to absorb three large housing estates along with smaller developments, and the amenities in the village are already heavily overburdened. (We have a brand new larger doctors' surgery being built but with no guarantee of additional doctors.) We cannot, in good conscience, add to this state of affairs.

If we have a change of mind in the future, and land is still required for housing, we will get back in touch with you.

Yours sincerely

Annette Simpkins

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Chris Wood

From: Jeremy Flawn [REDACTED]
Sent: 07 October 2022 15:28
To: Chris Hargraves
Cc: Charles Maxlow-Tomlinson
Subject: West Oxfordshire District Council Housing Land Supply Position Update (2022 – 2027) - Information required in relation to the East Chipping Norton SDA
Attachments: Land E Chipping Norton Trajectory October 22.doc

Dear Chris,

Please find attached trajectory information for the land to the north of London Road Chipping Norton as requested. This concerns the OCC land north of London Road only.



Please do not hesitate to contact me if you have any questions concerning the attached or the assumptions behind the figures.

Best regards,

Jeremy

Jeremy Flawn
Partner – Bluestone Planning

M: [REDACTED]

B P
Bluestone Planning  

Phone 01235 766825


Address 13 The Black Barn, Manor Farm, Manor Road, Wantage, OX12 8NE

ISO UKAS accredited 9001, 14001 and 45001



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Anticipated development trajectory – East Chipping Norton SDA – LAND NORTH OF LONDON ROAD ONLY

	1 st April 2022 – 31 st March 2023	1 st April 2023 – 31 st March 2024	1 st April 2024 – 31 st March 2025	1 st April 2025 – 31 st March 2026	1 st April 2026 – 31 st March 2027	1 st April 2027 – 31 st March 2028	1 st April 2028 – 31 st March 2029	1 st April 2029 – 31 st March 2030	1 st April 2030 – 31 st March 2031	1 st April 2031 – 31 st March 2032	1 st April 2032 – 31 st March 2033	1 st April 2033 – 31 st March 2034	1 st April 2034 – 31 st March 2035	1 st April 2035 – 31 st March 2036	1 st April 2036 – 31 st March 2037
Number of anticipated housing completions (per annum)			70	100	65										

Additional notes (please set out here any further information in support of the above assumptions)

A. Timescale s:

- | | |
|---|----------------|
| 1. Updates to surveys | Oct – Dec 2022 |
| 2. Pre-application engagement and consultations | Nov – Jan 2023 |
| 3. Submission of application | Mar 2023 |
| 4. Resolution to grant outline pp | Jul 2023 |
| 5. S106 / 30 / 278 negotiations | Jul – Sep 2023 |
| 6. Decision issued | Sep 2023 |
| 7. Sale of site | Jan 2024 |
| 8. Reserved matters submissions | Feb 2024 |
| 9. Conditions discharged | Jun 2024 |
| 10. Start on site | Jul 2024 |

B. Assumes 2 outlets operating at max 50 completions / yr / outlet. If affordable units are delivered separately by a RP then the overall rate of completions / yr may increase.

C. Based on 235 units capacity.

EP6

Site Details			
Site address:	Houghton Regis North Site 1 (HRN1) (Linmere)		
Site reference:	HT057	Application reference:	CB/12/03613/OUT CB/24/01505/RM CB/23/03987/RM
Major/Minor:	Major	Permission type:	Outline

Trajectory			
Total units:	3,230	Units in 5 year supply:	657

Year ¹	2024/25	2025/26	2026/27	2027/28	2028/29
Units	0	20	100	269	268

Deliverability Information	
Available now?	<p>Houghton Regis Site 1 is a strategic scale commitment. Development is underway and homes are occupied. The delivery information under ref: HT057 in the Trajectory relates to; Phase 1 - local centre, Phase 1 - parcel 5, Phase 3b and Phase 4</p> <p>The site is available now. The land has been cleared and parcels on Phase 1 have already been provided with road access and utility connections. This enables the swift delivery of housing units.</p> <p>At the time the S106 agreement was signed, the entire area of the HRN1 application was owned by a consortium of land owners with the intention of developing the site as a strategic mixed use urban extension. The members of the consortium included:</p> <ul style="list-style-type: none"> • Friends Life Limited (Aviva) • Landmatch Limited • St Albans Diocesan Property Company Ltd • Lands Improvement Holdings (Houghton Regis) • S.A.R.L • 10 other private landowners. <p>The land is being steadily sold off by the consortium to house builders.</p>

¹ 1 April – 31 March

Suitable location for development now?	Suitability is demonstrated by the site's identification as a strategic commitment in the Local Plan and its outline planning approval. Work on the wider strategic commitment is well underway at HRN1 with 503 dwellings completed and 280 under construction at 31.03.2024.	
	Planning status:	<ul style="list-style-type: none"> • The site is a Strategic Commitment in the Local Plan, Policy SC1. • Outline approval for 5,150 dwellings • Phase 1 parcel 5 – RM application for 189 dwellings submitted by Dandara NHC (housebuilder) • Phase 1 Local Centre – RM application for 52 dwellings submitted by Brickhill Homes Ltd (housebuilder)
	Planning progress:	<p>Planning progress on the wider HRN1 site is as follows:</p> <ul style="list-style-type: none"> • HT057a CB/20/00449/RM: Approved 29.06.2020 257 dwellings complete, 49 under construction (March 2024) • HT057b CB/20/00388/RM: Approved 03.07.2020 132 complete, 21 under construction (March 2024) • HT057c CB/21/02108/RM: Approved 14.10.2021 114 dwellings complete and 40 under construction (March 2024) • HT057d CB/21/04768/RM: Approved 25.05.2023 70 dwellings under construction (March 2024) • HT057e CB/21/05552/RM: Approved 02.08.2023 100 dwellings under construction (March 2024) • HT057g CB/23/01706/RM: Approved 21.09.2023 • HT057f CB/23/00066/RM: Approved 25.02.2024 <p>The delivery information under ref: HT057 in the Trajectory relates to; Phase 1 - local centre, Phase 1 - parcel 5, Phase 1 self build, Phase 3b and Phase 4. The</p>

		<p>planning progress on these remaining parcels is as follows:</p> <p>CB/12/03613/OUT: Approved 02.06.2014</p> <p>CB/23/03987/RM: Received 12.12.2023</p> <p>CB/24/01505/RM: Received 22.05.2024</p> <p>Phase 1 Local Centre</p> <ul style="list-style-type: none"> CB/23/03987/RM: this application is for the Local Centre at Phase 1 and will include 52 dwellings. It was registered on 12.12.2023. All that remains is for the unilateral undertaking to be completed. It is expected to be determined within the coming weeks. Brickhill Homes will be delivering this scheme. They have also delivered the Local Centre on Houghton Regis Site 2 (HRN2) so have a proven track record of this type of development in the immediate vicinity. <p>Phase 1, Parcel 5</p> <ul style="list-style-type: none"> CB/24/01505/RM: This application is for 189 dwellings at Phase 1 Parcel 5 and was registered on 22.05.2024. The application is valid and is currently out to consultation and has been subject to pre-application discussions. A decision is anticipated for August/September 2024. This proposal is subject to a PPA with Dandara Northern Home Counties. The timescales denoted within the PPA have slipped by approximately 12 weeks. This however does not impact on the expectation that the site will be fully completed within the five-year supply period. Dandara's application, details that they will be using Modern Methods of Construction (MMC) across the site which will result in a reduced construction time. This further reinforces the deliverability of the scheme. <p>Phase 1 self & custom build</p> <ul style="list-style-type: none"> There will be approximately 40 dwellings delivered through self & custom build on Phase 1. TOWN have been selected as the preferred bidder and have a proven track record for delivering such developments.
--	--	--

		<p>Phase 3b</p> <ul style="list-style-type: none"> • Phase 3 Area Design Code is approved, and Phase 3a has commenced construction. • Phase 3B (southern half of Phase 3) – AIA application currently with CBC for consideration. Once this is approved (anticipated Summer 2024) further road infrastructure will be delivered. At the current time, Dandara are not delivering on any other site at Houghton Regis North. <p>Phase 4</p> <ul style="list-style-type: none"> • Phase 4 – Area Masterplan Approved. AIA application approved for the main road infrastructure, landscaping, ground level works and archaeology. The AIA approval and delivery will unlock the sale / future development of various residential parcels across Phase 4 (and would only leave Phases 5 and 6 with no current active work on site). • Phase 4 – Design Code submission is with CBC and revisions to the application have been received in response to consultee comments. Expected approval July 2024 (this will tie in with opening up the residential parcels in Phase 4 as mentioned above). • Progress across HRN1 is demonstrated on the annotated aerial photograph accompanying this proforma.
	Site assessment work:	<p>Site assessment work and strategies for the Outline application include the following:</p> <ul style="list-style-type: none"> • Site wide design code • Site wide masterplan • Geophysical survey • Archaeological field evaluation • Health impact assessment • Travel plan • Infrastructure impact assessment • Framework travel plan • Green infrastructure strategy • Retail impact assessment • Transport assessment • Noise assessments • Nitrogen dioxide plan • Hedgerow survey • Wildlife surveys

		<ul style="list-style-type: none"> • Lighting reports • Foul water drainage strategy • Site wide open space and sport provision plan • Access and movement plan • Residential self build strategy
	Other information:	<p>Lead in times for other sites on HRN1 (see below) Annual housing delivery at Houghton Regis North (see below).</p> <p>The consortium have informed the Council that phases 3b and 4 are being marketed now and that they have had interest from several house builders.</p>
Assessment:	<p>This site is suitable for development and is available now. The planning progress shows that there has been a stream of planning applications submitted and approved since 2020 which was only temporarily halted by the Chilterns Beechwoods moratorium.</p> <p>The next two RM applications for 52 and 189 dwellings are anticipated to be determined in Summer 2024. Other sites on HRN1 have taken an average of 10 months from the date of RM approval to the first completions. Delivery rates across the wider area are also consistently high. Dandara's application details that they will be using Modern Methods of Construction (MMC) across the site which will result in a reduced construction time. There is therefore a realistic prospect that these two parcels will fully complete within the five-year supply period.</p> <p>This is a phased strategic site. As such, there are large parts of it that do not yet benefit from RM approval. It is however clear from the work already being done for Phase 3B and 4 that there is a substantial amount of momentum on this site. It is therefore realistic to include these phases within the five-year supply as confirmed by the developer consortium. This is further supported by the current planning status, progression towards submission of an application, progression with the site assessment work and relevant information on delivery that is available.</p> <p>Annual delivery rate information collected by monitoring officers for other parcels at Houghton Regis North, demonstrate that annual completions in excess of 100 can be achieved by a single national bulk developer within the area.</p> <p>There is realistic prospect of housing delivery on site within five years as assessed above.</p>	
Cross - references:	<p>Occupations profile provided by the developer consortium in June 2024.</p> <p>PPA for Phase 1 Parcel 5</p> <p>Lead in time evidence (see below)</p> <p>Delivery rate evidence (see below)</p>	

	<p>Aerial photographs of Local Centre site and Phase 1 parcel 5 (see below)</p> <p>Annotated aerial photograph showing the extent and progress of the HRN1 and HRN2 developments (see below)</p>
--	--

Lead in times on Houghton Regis North 1 from the date of RM approval

	RM submitted	RM approved	First completions recorded	Time from submission to first completions (months)	Time from approval to first completions (months)
20/00449	07/02/2020	29/06/2020	30/06/2021	16	12
20/00288	04/02/2020	03/07/2020	31/03/2021	13	8
21/02108	10/05/2021	14/10/2021	30/09/2022	16	11
Average				15	10

Annual housing delivery at Houghton Regis North sites 1 & 2

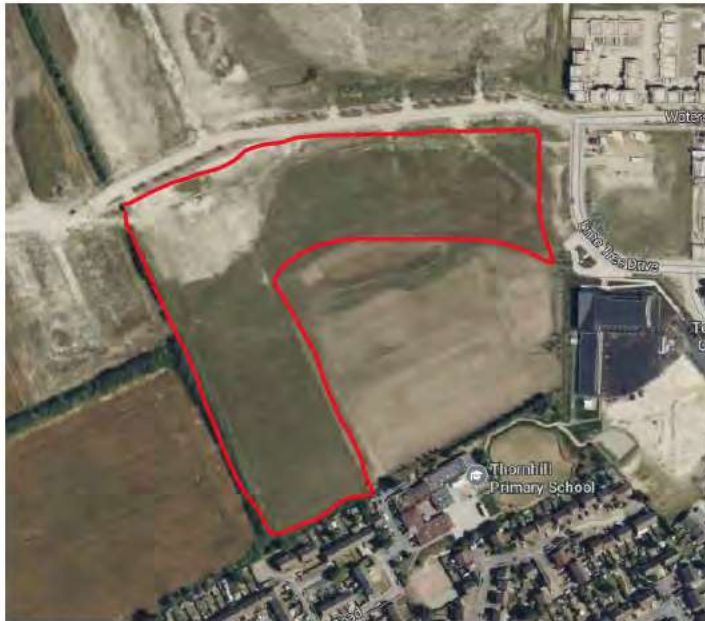
App. number	Address	No. dwellings	19/20	20/21	21/22	22/23	23/24	House builder
HRN Site 1								
20/00449	North of Houghton Regis (Site 1) (Area 1, Parcel 2)	306	0	0	57	81	119	Barratt David Wilson
20/00388	North of Houghton Regis (Site 1) (Area 1, Parcel 3)	153	0	5	65	62	0	Bellway
21/02108	North of Houghton Regis (Site 1) (Area 1, Parcel 1)	154	0	0	0	35	79	Bellway
HRN Site 2								
18/00811	North of Houghton Regis (Site 2 - Land West of Bidwell) Parcel 1, Thorn Road	97	46	33	18	0	0	Linden Homes
18/03530	North of Houghton Regis (Site 2 - Land West of Bidwell) Parcels 3 & 4 (Phases 7, 7a & 7b) Land at Thorn Road,	264	25	135	69	35	0	Bellway
19/00883	North of Houghton Regis (Site 2 - Land West of Bidwell) Land to West of Houghton Regis, Watling Street (Parcel 7)	255	0	116	104	35	0	Countryside Properties
19/03232	North of Houghton Regis (Site 2 - Land West of Bidwell) Parcel 5a & 5b	336	0	0	0	106	107	Countryside Properties

19/01218	North of Houghton Regis (Site 2 - Land West of Bidwell) Parcels 6A and 6B	625	0	54	125	122	149	Taylor Wimpey
20/00348	North of Houghton Regis (Site 2 - Land West of Bidwell) Land West of Houghton Regis	160	0	0	13	22	68	Abbey Homes
20/00626	North of Houghton Regis (Site 2 - Land West of Bidwell) Parcel 1, Bedford Road	109	0	0	11	29	69s	Storey Development



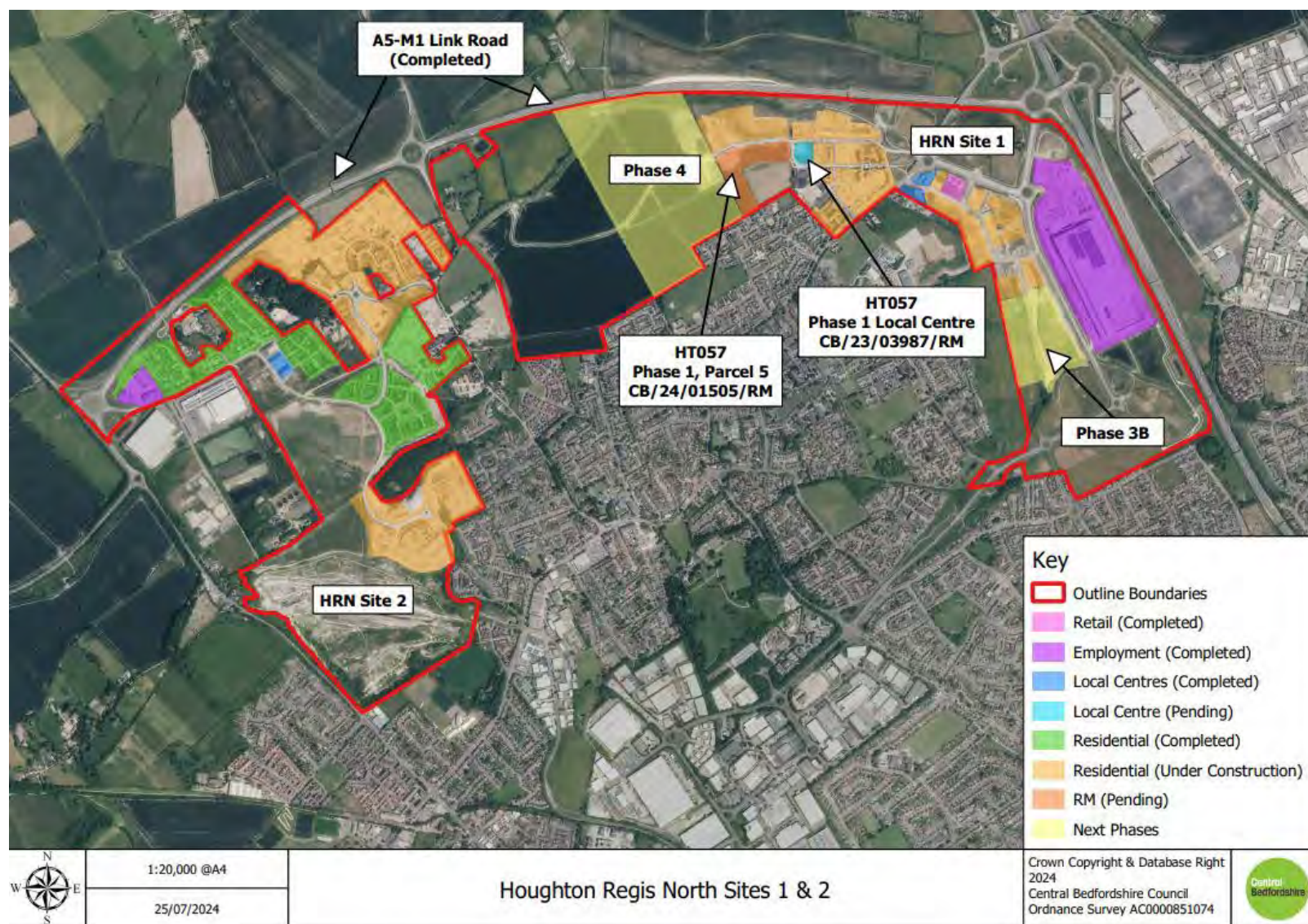
Aerial photograph showing the Phase 1 Local Centre site to be developed by Brickhill Homes.

Source: Microsoft Bing 2024



Aerial photograph showing the Phase 1, Parcel 5 site to be developed by Dandara.

Source: Microsoft Bing 2024



Annotated aerial photograph showing the extent of the HRN1 & HRN2 development sites and the progress to date.



PLANNING PERFORMANCE

AGREEMENT

(LEVEL 1)

DEVELOPER: Dandara Northern Home Counties

LAND PROMOTER: Land Improvement Holdings Ltd

SITE: Houghton Regis North Site 1, Land on the northern edge of Houghton Regis

DEVELOPMENT: Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; engineering operations.

PPA No.: CB/23/03996/PPA

PLANNING PERFORMANCE AGREEMENT –

LEVEL 1 TEMPLATE

1. Project Description & Parties

Project Description	<i>The submission of a Reserved Matters Application (RMA) for 189 units on parcel 5 and discharge of conditions 3 and 4 (post permission approval in accordance with the outline planning permission CB/12/03613.OUT) and the submission of matters to discharge conditions; 8,20, 25, 26 29 and 32</i>
Site Address/Location	<i>Houghton Regis North Site 1, Land on the northern edge of Houghton Regis</i>
Local Authority	Central Bedfordshire Council
Developer(s)/ Promoter	<i>Dandara Northern Home Counties</i>

2. Project Vision

To provide a development that displays high quality architecture in line with the approved Site Wide and Area Design Codes.

To provide a deliverable development of 189 dwellings at Phase 1, Parcel 5 of the Linnmere development that complies with the Site Wide and Area Masterplans having due regard to identifiable site constraints.

3. Objectives of the Planning Performance Agreement

1. To establish a shared commitment to an agreed timetable for submission and determination of the RMA (or other pre-commencement conditions) as a priority scheme;
2. To extend this commitment to determining submissions of details pursuant to conditions where relevant;
3. To set out the appropriate level of engagement with any relevant stakeholders;
4. To identify determining issues with technical consultees and agree steps to resolve them wherever possible; and
5. To promote high quality design in accordance with the parameters of the Design Codes.

4. Key Personnel

Council Project Team		
Name	Position/Role	Contact Details (Email & Tel)
[Redacted Content]		

Developer Project Team		

[Relevant specialist within the Council e.g. Sustainable Drainage/Archaeology may be required to support the Project Group and should be listed depending on the specific issues of each scheme]

5. Key Issues and Task Plan

Issue	Action/Task	Responsibility	Progress	Timetable/Dates
Pre-application discussions	Submit draft layout, draft streetscenes, landscape proposals or other relevant details	Developer		<i>Submit Wednesday 20th December 2023 (Landscape and further detail to follow at meeting)</i>
Pre-application Technical consultee meeting	Discuss consultee comments	CBC		<i>w/c 15th January 2024</i>

RMA or other pre-commencement conditions submission		Developer		w/c 26 th February 2024
Timescales	Determine Application	CBC Case Officer		<i>Determination within 8 weeks, with a 28-day consultation period w/c 29th April 2024</i>
Implementation	Discharge conditions	CBC Case Officer		

6. Communication Plan

This section identifies the communication methods and frequencies used for the project. The list below is not exhaustive and is intended as a guide.

The project will implement the following communication plan:-



1. To hold meetings when reasonably required. The frequency is to be reviewed following the pre-application stage;
2. The developer is required to liaise with Ward Members and Houghton Regis Town Council prior to the submission of reserved matters.
3. CBC will respond to all urgent emails and telephone calls within 2 working days of receipt;
4. CBC will respond to all non-urgent emails, and telephone calls within 5 working days;
5. The RMA or pre-commencement submissions will be accompanied by the documentation as agreed in pre-application discussions;
6. CBC will seek to ensure effective liaison with key statutory and other internal consultees, relevant Government departments, agencies or bodies whose activities may directly or indirectly impinge on the implementation of the proposed development of the site;
7. CBC to engage with Ward Members and Executive Member for Regeneration through an established Houghton Members Advisory Group;
8. The developer may be required to attend the Members Advisory Group meetings at CBC Council Offices.

7. Fees

[Developer/Land Promoter] agrees to pay CBC the following amounts on the stated dates in accordance with the CBC charging schedule.

£16,065 on signing of the Planning Performance Agreement

8. Acceptance of Planning Performance Agreement incorporating Appendix 1, 2 and PPA Standard Terms and Conditions

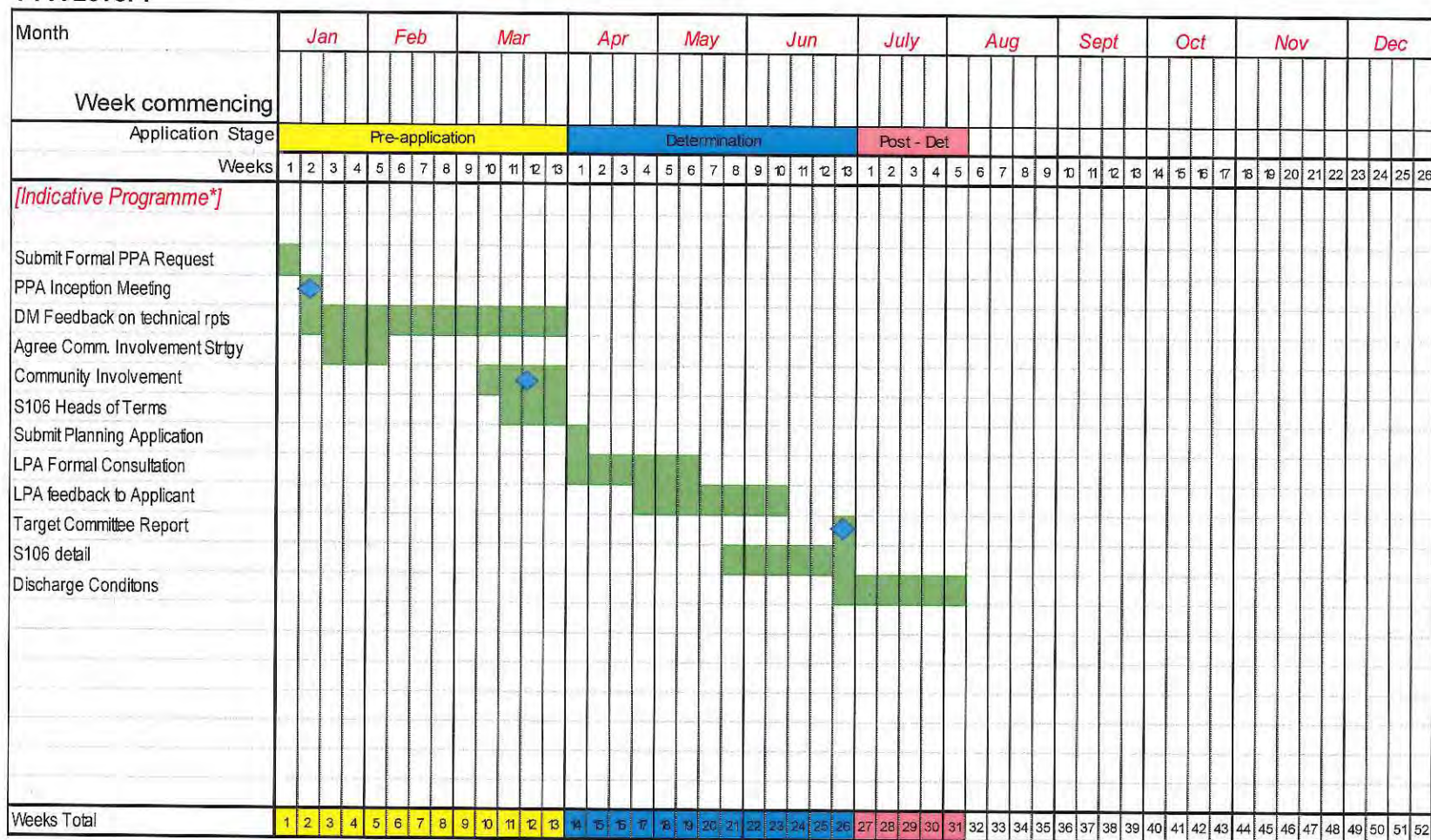
Signature of Developer	Signature of Council
	
Name	Name
Position	Position
On Behalf of: Dandara Northern Home Counties	On Behalf of: Central Bedfordshire Council
Date: 13/12/2023	Date: 13 - 12 - 2023

Appendix 1: Site Location Plan *[Insert Site Plan]*

Appendix 2: Project Plan *[Insert Level 1 Project Plan – as Picture from Excel]*

Indicative Project Plan: *[Insert Site Name/Location]*

PPA Level 1



[Indicative Project Plan should be altered according to Key Issues/Task Plan in Section 5.]*

Summary

	Total	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Jun-24																				
Phase 1	661	137	142	130	96	73	51	26	6	1	0	0	0	0	0	0	0	0	0	0
Phase 2	100	29	50	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Phase 3a	424	36	95	95	95	88	15	0	0	0	0	0	0	0	0	0	0	0	0	0
Phase 3b	505	0	0	0	34	45	45	1	23	120	90	90	58	0	0	0	0	0	0	0
Phase 4	1156	0	0	0	135	178	186	230	222	142	64	0	0	0	0	0	0	0	0	0
Phase 5	897	0	0	0	0	0	0	0	0	38	69	83	111	180	225	126	48	7	7	5
Phase 6	387	0	0	0	0	0	0	0	0	0	15	91	96	96	73	6	6	4	0	0
	4130	202	287	245	360	384	297	258	250	300	238	264	265	276	298	132	54	11	7	5
		202	489	734	1094	1477	1775	2032	2282	2582	2820	3084	3348	3624	3921	4054	4107	4118	4125	4130





Summary Proof of Evidence of Ben Pycroft re: Housing Land Supply For Countryside Partnerships (Eastern Home Counties) | 24-383

Construction of 173 no. dwellings including public open space, landscaping, access, drainage, parking, servicing, utilities and all associated infrastructure and ancillary buildings at land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex

LPA ref: 22/0484/FUL, PINS ref: APP/M1520/W/24/3351658

Project: 24-383
Site Address: Land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex
Client: Countryside Partnerships (Eastern Home Counties)
Date: 20 December 2024
Author: Ben Pycroft

Contents

1.	Introduction	2
2.	Summary	5



1. Introduction

- 1.1 This summary proof of evidence is submitted on behalf of Countryside Partnerships (Eastern Home Counties) (i.e. “the Appellant”) in support of its appeal against the decision of Castle Point Borough Council to refuse to grant planning permission to:

“Construct 173No. dwellings including public open space, landscaping, access, drainage, parking, servicing, utilities and all associated infrastructure and ancillary buildings”.

at Land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex (LPA ref: 22/0484/FUL, PINS ref: APP/M1520/W/24/3351658).

- 1.2 This summary and my main proof of evidence address matters relating to the Council’s five year housing land supply (5YHLS). They should be read alongside the proofs of evidence of Annie Gingell, which addresses affordable housing and Matthew Wood, which addresses all other planning matters in relation to this case.

Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am a Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have extensive experience in dealing with housing supply matters and have prepared and presented evidence relating to five year housing land supply calculations at several Local Plan examinations and over 70 public inquiries across the country.
- 1.5 I understand my duty to the inquiry and have complied, and will continue to comply, with that duty. I confirm that this evidence identifies all facts which I regard as being relevant to the opinion that I have expressed, and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion. I believe that the facts stated within this proof are true and that the opinions expressed are correct and comprise my true professional opinions which are expressed irrespective of by whom I am instructed.
- 1.6 I provide this summary, my main proof of evidence and a set of appendices. I also refer to several core documents and the Statement of Common Ground in relation to housing land supply.



Relevant background

Revised National Planning Policy Framework and the standard method for calculating Local Housing Need

- 1.7 On 12th December 2024, the Government updated the National Planning Policy Framework (the Framework) and adopted a new standard method for calculating Local Housing Need.
- 1.8 The outcome of these changes means that Castle Point cannot demonstrate a 5YHLS at 1st April 2024 by a very significant margin even on its own supply figure. The Council considers the deliverable supply at 1st April 2024 is 1,143 dwellings. Against the revised standard method figure of 701 dwellings per annum and a 20% buffer, this equates to just 1.36 years (a shortfall against the 5YHLS including a 20% buffer of 3,063 dwellings). My supply figure of 463 dwellings equates to 0.55 years and a shortfall in the 5YHLS of 3,491 dwellings.

The Council's latest position on 5YHLS

- 1.9 At the time the appeal application was determined in March 2024, the Council considered that it could demonstrate a 2.31 year supply¹.
- 1.10 In August 2024, a decision relating to an appeal made by This Land Development Limited against the decision of the Council to refuse to grant outline planning permission for a mixed use development including up to 455 dwellings at land east of Rayleigh Road, Thundersley was issued². In that decision, Inspector Dawe explained that the Council could demonstrate a 1.86 year supply (paragraph 44, page 10). This was an agreed position between the Council and the Appellant for that appeal and was the Council's published position as set out in the Authority Monitoring Report (AMR) April 2021 – March 2022³.
- 1.11 The Council has since published its AMR April 2022 – March 2024⁴. The AMR claims that at 1st April 2024, the Council has a deliverable supply of 1,143 dwellings from the following sources⁵:
- 573 dwellings on 7 Strategic Site Allocations;
 - 494 dwellings on sites with extant planning permission as listed in Appendix 4 of the AMR;
 - 36 dwellings on sites listed as "SHLAA Policy Compliant and expired consents";

¹ Core document **3.2** – page 22

² PINS ref: 3338797 – 22nd August 2024 – core document **8.2**

³ Core document **7.8** – Figure 9, page 13

⁴ Core document **7.29**

⁵ Core document **7.29** – Housing Trajectory at April 2024 - page 11



- 100 dwellings on the net Brownfield register sites;
- 180 dwellings on windfall sites; and
- Minus 240 dwellings on losses on strategic sites (i.e. land at Thorney Bay).

1.12 As above, against the revised standard method and a 20% buffer, the Council's supply figure equates to 1.36 years. The Council's 5YHLS has significantly decreased since the appeal application was determined.

1.13 On 21st November 2024, I wrote to the Council to request information relating to the Council's published position as set out in the AMR⁶. I received a response on 12th December 2024⁷. However, this did not provide the information I requested, including:

- The clear evidence required to support the inclusion of category b) sites in the 5YHLS i.e. the Strategic Allocations referred to above;
- The specific SHLAA and Brownfield Register sites the Council relies on to include 36 and 100 dwellings respectively in the 5YHLS; or
- The list of specific sites with extant planning permission the Council relies on to include 494 dwellings in the 5YHLS referred to above.

1.14 My assessment of the Council's 5YHLS is therefore based on the evidence as set out in the AMR.

⁶ Appendix EP1

⁷ Appendix EP2



2. Summary

- 2.1 The Council accepts that it cannot demonstrate a 5YHLS as it is required to by paragraph 77 and footnote 42 of the Framework. As above, the Council's latest position is that it has a deliverable supply at 1st April 2024 of 1,143 dwellings, which against a local housing need of 701 dwellings and a 20% buffer equates to **1.36 years** (a shortfall against the 5YHLS including a 20% buffer of 3,063 dwellings).
- 2.2 The following matters in relation to 5YHLS are agreed:
- The relevant base date for assessing the 5YHLS the purpose of this appeal is 1st April 2024 and the relevant 5YHLS period is to 31st March 2029;
 - The 5YHLS should be measured against the local housing need calculated using the standard method set out in the Planning Practice Guidance (PPG). This is 701 dwellings per annum;
 - The 20% buffer applies; and
 - The Council cannot demonstrate a 5YHLS.
- 2.3 The extent of the deliverable supply is not agreed. As above, the Council considers that it can demonstrate a deliverable supply of 1,413 dwellings.
- 2.4 For the reasons set out in my proof of evidence and summarised below, I challenge the inclusion of the following sites in the Council's 5YHLS.

Table A – Disputed sites in the Council's 5YHLS at 1st April 2024

Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed	Summary reason for dispute
HO15	Land south of Scrub Lane	Pre-app	49	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO17	Hadleigh Island Site	Pre-app	40	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS



Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed	Summary reason for dispute
HO22	Land at Thames Loose Leaf	Pre-app	12	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO25	Land at Thorney Bay	Proceeding under existing consents	120	The AMR does not list the consents or provide an explanation why 120 net dwellings should be included in the 5YHLS. I asked the Council to provide this information but this has not been provided.
HO28	Land at Admiral Jellicoe	8 completions	24	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
	Extant planning permission at 1 st April 2024	Planning permission	119	Appendix 4 of the AMR lists 475 net dwellings, not 494 The Strategic allocations listed in the AMR are double counted in Appendix 4 and completions have not been removed from the figures. This means only 375 dwellings should be included from this source, not 494 – a reduction of 119 dwellings.
	SHLAA Policy Compliant & Expired Consents		36	The sites have not been identified and the Council has not provided clear evidence for their inclusion



Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed	Summary reason for dispute
	Brownfield Register		100	The sites have not been identified and the Council has not provided clear evidence for their inclusion
	Windfall allowance		180	The Council has not provided compelling evidence for a windfall allowance of 180 dwellings in addition to the windfall sites already included in the 5YHLS.
	Total		680	

2.5 I therefore conclude that the 5YHLS at 1st April 2024 is 463 dwellings (i.e. 1,143 – 680 = 463). Against the Local Housing Need and a 20% buffer, this equates to **0.55 years** as shown in the following table:

Table B – Castle Point's 5YHLS at 1st April 2024

		Council	Appellant
	Requirement		
A	Annual local housing need	701	
B	5YHLS requirement without buffer (A X 5 years)	3,505	
C	5YHLS requirement plus 20% buffer (B + 20%)	4,206	
D	Annual 5YHLS requirement plus 20% (C / 5)	841	
	Supply		
E	5YHLS at 1 st April 2024	1,143	463
F	Supply in years (E / D)	1.36	0.55
G	Surplus / shortfall in 5YHLS (E – C)	-3,063	-3,743



2.6 The policy implication of this is addressed by Matthew Wood.



