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Rebuttal Planning Proof of Evidence

APP/D3125/W/23/3331279

Land South of Burford Road, Minster Lovell

Appeal by Catesby Strategic Land Limited against the refusal of application
22/03240/OUT by West Oxfordshire District Council for:

‘Outline planning permission for the development of up to 134 dwellings (Use Class C3)
including means of access into the site (not internal roads) and associated highway works,
with all other matters (relating to appearance, landscaping, scale and layout) reserved’

JANUARY 2024

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I INTRODUCTION

- I.1 My name is Alan Divall and I am a Director at Walsingham Planning.
- I.2 This Rebuttal Planning Proof of Evidence has been prepared on behalf of my clients Catesby Strategic Land Limited – the Appellant.
- I.3 The Rebuttal Planning Proof should be read alongside my Planning Proof of Evidence (January 2024).
- I.4 The Rebuttal Planning Proof includes:
 - a) An erratum relating to my main Planning Proof of Evidence (January 2024)
 - b) A response to planning related matters within the WODC Proof of Evidence prepared by Mr Chris Woods (dated 18 January 2024) (Core Document E17).

2 ERRATUM

- 2.1 The Inspector's attention is drawn to the following errors contained at Table I within my main Planning Proof of Evidence.
- 2.2 Mr Mylchreest provides the substantive assessment relating to landscape matters. My evidence was always intended to be reliant on his substantive assessment. Since exchange of evidence, I have noticed a number of errors in my evidence which I correct here.
- 2.3 Deleted text is ~~striketrough~~, corrected/additional text is highlighted in yellow.

Table I: Policy OS2 – Compliance with General Principles

General Principles	Appellant's Response	Compliance
Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality;	<p>The Appeal site and proposal is considered proportionate and appropriate in its scale to its context in its own right and cumulatively alongside the WIT4 allocation. The WIT4 allocation was also considered proportionate and appropriate in its scale to its context. Paragraph 6.103 of Mr Mylchreest's evidence confirms the Appeal proposal complies with this part of the General Principle. It is acknowledged that there is some landscape conflict with policy EH2.</p> <p>(Reference to policy EH2 was included here in error and is dealt with separately within my proof of evidence (paragraphs 5.75 – 5.86))</p> <p>All cumulative impacts of the development have been fully addressed as part of the Appeal proposals, this</p>	<p>Limited conflict.</p> <p>Compliant – no conflict.</p>

	<p>includes mitigation through the Section 106.</p> <p>Column 3 should have been recorded as 'Compliant – no conflict' based upon the Appellant's response above.</p>	
<p>As far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s;</p>	<p>This is dealt with under Issue 2.</p> <p>The General Principle requires development to 'as far as reasonably possible protect or enhance the landscape' and the evidence by Mr Mylchreest demonstrates this has been achieved in his paragraphs 6.102 and 6.103.</p> <p>Column 3 should have been recorded as 'Compliant – no conflict' based upon the Appellant's response above.</p>	<p>Limited conflict.</p> <p>Compliant – no conflict.</p>
<p>Conserve and enhance the natural, historic and built environment;</p>	<p>This is dealt with under Issue 2.</p> <p>The evidence of Ms Stoten confirms there is no harm to the historic or built environment.</p> <p>The General Principle includes the wording 'Conserve'. The Collins English Dictionary¹ defines conserve as '<i>To conserve something means to protect it from harm, loss, or change</i>'. The evidence of Mr Mylchreest at paragraphs 6.102, 6.103, 6.104, 6.114 is that whilst the proposal recognises the intrinsic character and beauty of the countryside and therefore</p>	<p>Compliant – no conflict.</p> <p>Limited conflict with regards to landscape matters only</p>

¹ <https://www.collinsdictionary.com/dictionary/english/conserve>

	<p>respects it in accordance with paragraph 180 of the NPPF, there is inevitably some limited level of (inevitable) harm to the landscape character of the Appeal site and its immediate surroundings. This would inevitably arise in respect of any greenfield development. Limited conflict with the strict wording of the General Principle is therefore identified. I deal with the implications of this below.</p> <p>Enhancements to the natural environment are delivered through biodiversity net gain of 13.10%.</p>	
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- 2.7 I conclude with regards to the amendments in Table 1 above that limited conflict has been identified with one of the bullet points of the General Principles. However, as I have set out in paragraph 5.26 of my Proof of Evidence *'it is inevitable that any new development on a greenfield site adjoining the built up area of a village is going to result in an impact on the landscape to some degree'*. This limited conflict is then considered in the planning balance. As I set out further below (and in my proof of evidence), Policy H2 of the WOLP *'permits'* new dwellings on undeveloped (greenfield) land – subject to demonstrating they are needed to meet identified housing needs; the proposal is in accordance with the distribution of housing set out in Policy H1 and is in accordance with other policies in the Plan, in particular the General Principles in Policy OS2.

3 RESPONSE TO WODC PROOF OF EVIDENCE

- 3.1 The Appellant responds to WODC's (Mr Wood's) Proof of Evidence as follows:

Limited development (paragraphs 9.26-9.32)

- 3.2 WODC allege that the Appeal proposal is not limited development because of its size when considered cumulatively with the Bovis allocation – paragraph 9.27 of Mr Wood's Proof of Evidence (Core Document E17)
- 3.3 Policy OS2 states that the villages are '*suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities*'. The Policy also states that '*Proposals for residential development will be considered in accordance with Policy H2 of this Local Plan*'. There is no 'numerical' cap on the size of new development that can come forward adjoining the built-up areas of the villages. The consideration of whether the Appeal proposal is 'limited development' needs to be considered having regard to the WOLP as a whole and how its policies work together.
- 3.4 Policy H2 of the WOLP 'permits' new dwellings in a number of circumstances. This includes allocated sites identified in the Plan but also (bullet point 4 – page 47) on undeveloped (greenfield) land adjoining the built-up area – subject to the criteria in the bullet point being met. Greenfield development can therefore come forward in addition to allocations in the Plan – again providing the relevant criteria in the policy are met.
- 3.5 The criteria in bullet point 4 are:
- a) Where convincing evidence is presented to demonstrate that it is necessary to meet identified housing needs – the detailed evidence of Mr Richards, Mr Roberts and summarised within my proof of evidence demonstrates that there is convincing evidence of identified housing needs. That evidence includes (i) a substantial shortfall in five year housing land supply; (ii) a serious failing of the Plan to deliver its minimum amount of housing in the Plan period and (iii) the serious and worsening affordability issues that are prevalent in WODC. I note the Inspector for the Appeal at Land North of Cote Road, Aston (Core Document O1) (paragraphs 52 and 53) agreed that all of these matters (i – iii) were clear evidence to justify development in Aston.

I conclude there is no conflict with this criteria of bullet point 4.

- b) It is in accordance with the distribution of housing set out in Policy H1 – this criteria requires demonstration that there is no harm from the Appeal proposals to the overall spatial strategy of the Plan – Policy H1.

The Witney Sub Area is identified in Policy H1 as the Sub Area that will take the most new homes within the Plan period – 4,702. As identified in paragraphs 5.27 – 5.36 of my proof of evidence, the 4,702 new dwellings figure is not a cap on development and sites that are not allocated (windfalls) are required to deliver this minimum figure of 4,702. Further, the evidence of Mr Richards demonstrates clearly that the allocations in the Sub Area are not delivering. Across both the East Witney and North Witney strategic allocations identified in the WOLP, 150 homes (75 homes each) should have been delivered by 1st April 2023. They have delivered zero. By the end of 2028 (the end of the current 5 year period), the WOLP expected 1,250 homes to have been delivered but the latest 5YHLS supply statement now includes no homes as deliverable from those two sites. The WOLP expected 1,850 homes to be delivered from those sites in combination by the end of the plan period and, whilst the Council do not now say when they expect those sites to be delivered, the fact that they will be 1,250 homes behind with only 3 years of the plan period left clearly demonstrates that the numbers the WOLP expected to be delivered in the Witney sub area won't be achieved, and likely by some margin.

I consider that far from harming the spatial strategy of the WOLP, the Appeal proposal will in fact support its objective of delivering new homes to the Witney Sub-Area where the most new homes are planned and where those new homes are failing to be delivered in accordance with the strategic priorities of the WOLP.

This is supported by the WODC Planning Policy Consultation response to the outline application (Core Document D12) (pdf page 3) which states (with my emphasis):

In terms of the distribution of housing, Policy H1 identifies the provision of 4,702 homes in the Witney sub-area (in which Minster Lovell lies), the intention being that this will be met through a combination of past completions, permissions, allocations and windfall development. Policy WIT6 sets out the overall strategy for the Witney sub-area. Witney is the focus of new housing, supporting facilities and additional employment opportunities. New development in the rest of the sub-area is limited to meeting local community and business needs and is steered towards the larger villages.

Given that the figure of 4,702 homes is not a ceiling to development, I do not consider that the provision of a further 140 homes in this location presents an obvious and significant conflict with the distribution of housing set out in Policies H1 and WIT6.

I note that the Officer places a policy restriction in the comments in terms of new development in the rest of the Sub-Area being limited to meeting 'local' needs. Policy H2 does not require demonstration of such – only to meet 'identified housing needs'. However, the Officer is clear that the Appeal proposal would not conflict with the spatial strategy.

I note the findings of the WOLP Inspector in his August 2018 Report (Core Document G4) (paragraphs 93 – 95) where he discussed the suitability of the Witney Sub Area to take the majority of the housing growth in the District. Paragraph 100 of his report also discusses what would happen in the event of a windfall proposal coming forward. The Inspector states:

'It has been argued that policy H1's indicative number of dwellings in each sub-area would, in effect, stifle otherwise appropriate windfall development. However, this is unlikely to be the case as policy H1 makes clear that the indicative distribution is not to be taken as either an absolute target, or a maximum ceiling on development in any of the sub-areas. Refusal of permission for a windfall housing scheme on the basis of conflict with this aspect of policy H1 would only be likely if a single, extremely large windfall development or the cumulative effect of numerous smaller ones were to substantially alter the overall distribution of housing between the sub-areas'.

For the reasons set out above, the proposals would be in accordance with the distribution of housing set out in Policy H1 and there would be no conflict with this criteria of bullet point 4.

- c) *Is in accordance with other policies in the Plan and in particular the general principles in the Policy OS2 – whilst there is some limited landscape conflict identified with regards to policy EH2 and one OS2 General Principle, this arises as a consequence of the fact the Appeal proposal is greenfield development. It cannot follow that this limited conflict brings into conflict the Appeal proposals with this part of Policy H2. Policy H2 specifically contemplates greenfield development.*

I conclude there is no conflict with this criteria of bullet point 4.

- 3.6 As I confirm in paragraph 36 of my Proof of Evidence, there is no conflict with Policy H2 (and with the plan as a whole).
- 3.7 I conclude on what is meant by 'limited development' in the context of Policy OS2.
- 3.8 There is no numerical cap on development within the policy and the question as to whether the Appeal proposal is limited development cannot be asked in isolation of consideration of the remainder of the policy and the planning impacts of the scheme.
- 3.9 Policy OS2 specifically invites residential proposals to be assessed in accordance with H2. Policy H2 is more restrictive in respect of land adjoining the built up area, and therefore limits development that can come and that meets the tests set out (which we do – as demonstrated in paragraph 3.5). This includes consideration of the distribution strategy of the plan, which we accord with.
- 3.10 Where Policy OS2 references 'limited development', the sentence has to be read as whole - it is limited development which respects the village character and local distinctiveness and would help maintain vitality. The supporting text to the policy (paragraph 4.22) makes it clear that the limitation is to development that achieves those objectives. In accordance with Policy OS2 and H2, that issue is tested through considering the general principles in OS2. These consider scale in respect of the impact of the proposal on local context, and also consider other relevant factors (such as whether there is necessary infrastructure – which is agreed to be the case here). We comply with these matters. Therefore, this is development contemplated by the Plan.
- 3.11 I note in the Appeal decision at Aston (Core Document O1) the Inspector at paragraph 55 noted that:
- 'The term 'limited' is not defined but the appeal proposal for 40 dwellings would be consistent with the policy in my view, even having regard to other development that has taken place recently. It would be a proportionate and logical extension of existing modern development in the village which makes an efficient use of land. The detailed policy criteria, including the general principles, would be met'.***
- 3.12 I note in this decision that the Inspector concluded there would be some 'landscape and visual harm' - paragraph 57 – as I have identified.

- 3.13 I also note in the Appeal at Ducklington (Core Document O2) the Inspector found at paragraph 40 that the proposal would not be 'limited in scale' but concluded:

'The proposal would conflict with Policy OS2 in terms of not being limited in scale, however the indicative scheme shows that the site can accommodate 120 dwellings at low density. I find that the proposal would not be seen or perceived to be overwhelming and would not undermine the form of the settlement, so in these respects would not conflict with Policy OS2'.

- 3.14 I conclude that the Appeal proposals are no different in this regard.

- 3.15 I note that Mr Wood raises an issue of harm related to 'social cohesion'. Firstly, there is no Development Plan policy that mentions this. Secondly, my Proof of Evidence and the evidence of Mr Neale (Core Document E10) demonstrates the range of services and facilities available to resident in Minster Lovell. There is no reason or evidence to suggest that new residents would not be welcomed into the village or successfully integrated.

- 3.16 If the Inspector does not agree with me in this regard, for the reasons set out within my proof of evidence, this rebuttal and the evidence of Mr Richards, WODC cannot demonstrate a five year housing land supply and the tilted balance is engaged. Accordingly, the weight attributed to policies (in the basket of policies which is the most important for determining the Appeal) is reduced to limited. OS2 is one of the most important policies.

Is the proposal necessary to meet identified housing needs (paragraphs 9.33-9.42)

- 3.17 At paragraph 9.35, Mr Wood considers that the Appellant's case regarding the Appeal proposals being necessary to meet identified housing needs '*rest entirely on its claim that there is an HLS shortfall*'. This is incorrect in that the Appellant's case (including the detailed evidence of Mr Richards) sets out that the WOLP has failed, and will fail, to deliver the numbers of new homes that it should within the Plan period. This demonstrates the Appeal proposal is necessary to meet identified housing needs for both the District as a whole and within the Sub Area.

- 3.18 It is notable that Mr Wood fails to mention the failure of the spatial strategy of the WOLP to deliver sufficient housing within his Proof of Evidence, despite previously conceding this point during cross examination at the Land north of Cote Road, Aston Appeal (Core Document O1). In his Closing Submission (Core Document CD P4) (paragraph 27) Giles Cannock KC confirms Mr Wood's position on this matter.

Planning benefits of the Appeal proposal (table at paragraph 10.36)

- 3.19 My main Proof of Evidence included the provision of self build plots within the overall weightings for the provision of housing. For consistency I have now drawn out the self build plots as a separate weighting. I note Mr Wood also includes the other benefits that were not included within my Proof of Evidence. I included these and give them the following weight in the planning balance.

Benefits	Weight to be Afforded
<i>Social</i>	
The provision of 5% (up to 7) of the new homes as self-build plots.	Substantial Weight
A children's play area and open/recreational space.	Moderate Weight
<i>Environmental</i>	
Sustainability measures (meeting the requirements of the 2025 Future Homes Standard before they come into force – i.e., delivering homes which achieve a 75% carbon reduction and are Net Zero Ready).	Substantial Weight

- 3.20 The Government's published 'Right to Build Register Monitoring' data for Self-Build and Custom Housebuilding (last updated on 31st March 2023)² provides the figures reported by local authorities for the periods 2016, 2016-17, 2017-18, 2018-19, 2019-20, 2020-21 and

² <https://www.gov.uk/government/publications/self-build-and-custom-housebuilding-data-2016-2016-17-2017-18-and-2018-19/data-release-self-build-and-custom-housebuilding-data-2016-to-2020-21>

2021-22. This includes the number of entries on the local authority's Self-Build and Custom Housebuilding register for each period along with the number of planning permissions granted. The figures for WODC are shown in the table below:

Table 2: Right to Build Register Monitoring Data for Self-Build and Custom Housebuilding in West Oxfordshire

Base Period	Number of entries registered on self-build and custom housebuilding register	Number of Planning Permissions granted
1 st Base Period - 2016	254	-
2 nd Base Period - 2016/17	163	0
3 rd Base Period - 2017/18	82	7
4 th Base Period - 2018/19	193	61
5 th Base Period - 2019/20	76	13
6 th Base Period - 2020/21	109	0
7 th Base Period - 2021/22	126	0

- 3.21 Whilst the Appellant is not aware of any detailed evidence which shows which permissions granted may be 'suitable' to meet the requirements for Self-Build and Custom Housebuilding, the Government data summarised in the table above clearly demonstrates that WODC has not granted enough planning permissions to address demand arising from any base period. In fact, there has been a severe shortfall in provision. This was also the position confirmed by the Inspector for Appeals in WODC on Land to the rear of Brock Cottage, Brize Norton

(Core Document O29) (paragraph 34) and Land east of Hill Rise, Woodstock (Core Document O21) (paragraphs 116 and 117).

- 3.22 It is therefore clear that WODC is failing seriously to deliver suitable self-build and custom plots in accordance with its statutory duty, and as such I give substantial weight to the provision of up to 7 self-build plots in the planning balance.
- 3.23 The delivery of enhanced sustainability measures meeting the requirements of the 2025 Future Homes Standards before they come into force, and therefore over and above current building regulations is given substantial weight in the planning balance.
- 3.24 West Oxfordshire District Council declared a climate and ecological emergency in June 2019 with the ambition to become a carbon neutral council by 2030. The Council developed a Carbon Action Plan³ and Climate Change Strategy⁴ to support the delivery of this commitment.
- 3.25 A Sustainability Statement (Core Document CD A22) was submitted in support of the outline planning application and updated during the application timeframe (Core Document CD B12) provides full details of the proposed enhanced measures. In summary, the Appellant commits that the proposed dwellings would be built to meet the 2025 Future Homes Standards, delivering net zero ready homes which reduce carbon emissions by at least 75% beyond current building regulations.
- 3.26 The Sustainability Statement explains that this will be achieved through a combined fabric, energy efficiency and low carbon renewable energy approach such as; triple glazed windows, heat recovery systems, provision of solar PV on all homes and air source heat pumps.
- 3.27 It is proposed that a condition be imposed if outline permission is approved that the development be constructed in accordance with the supporting Sustainability and Energy Statement.
- 3.28 The above commitments by the Applicant accord with the aspirations of the Council's Carbon Action Plan and Climate Change Strategy and are significantly in excess of the measures that can be secured by adopted local planning policy.

³ [Our route to carbon neutral - West Oxfordshire District Council \(westoxon.gov.uk\)](https://www.westoxon.gov.uk/our-route-to-carbon-neutral)

⁴ [Climate Change Strategy \(westoxon.gov.uk\)](https://www.westoxon.gov.uk/climate-change-strategy)

- 3.29 The Inspector for the Appeal at Land east of Hill Rise, Woodstock (Core Document O21) gave significant weight (paragraph 121) to equivalent sustainability credentials in the planning balance.

Deliverability (paragraphs 10.42-10.47)

- 3.30 The Appellant considers that the following phasing for the proposals are appropriate in the context of the delivery of all dwellings within a five year period. This information has been prepared in response to WODC's concerns that the site will not be delivered within a five year period.

- 3.31 The Appellant has a demonstrable track record of delivering sites quickly. As shown on the table listed at Appendix I, on average across the 23 sites they have achieved outline consent for (not subject to a judicial review claim) where development has commenced, there is an average lead in time from achieving outline consent of:

- 10 months to the submission of reserved matters applications
- 19 months to development commencing

- 3.32 In the event that planning permission is granted, the Appeal site will be sold to a housebuilder. There are no significant site constraints or required offsite infrastructure which would unduly delay a sale or commencement of development. Based on the Appellant's track record, it is considered achievable that a reserved matters application could be submitted within 12 months of the grant of outline planning permission. Development could commence in 2025 and would be complete within 4 years. Key Milestones are set out below:

- 2024 – Outline permission granted, site sale and reserved matters application submitted
- Year 1 (2025) – Reserved matters granted; site preparation and start on site
- Year 2 (2026) – c40 completions
- Year 3 (2027) – c40 completions
- Year 4 (2028) – c40 completions
- Year 5 (mid 2029) – development completed

3.33 These anticipated delivery rates are consistent with those for the adjacent Bovis development (126 homes / 18/03473/RES) which sold between 2020-23 equating to an average completion rate of 42 homes per annum / 0.8 per week.

3.34 My view that the appeal development can be completed within 5 years is supported by Planning Policy Consultation Response (CD D12) which states:

“Whilst it is an outline rather than a full application, given the scale of development, it is reasonable to assume that if permitted, a good proportion, if not all, of the 140 (sic) dwellings would be completed within the next 5 years particularly given the relatively rapid build out of the adjoining site which is expected to be completed this year”

3.35 Thames Water’s pre-development enquiry response regarding foul drainage capacity (Appendix M of the Flood Risk Assessment – Core Document CD A16) indicates that typical timescales to complete off-site reinforcement to serve a development of the scale proposed are:

- Modelling: 8 months
- Design: 6 months
- Construction: 6 months

Total: 20 months

3.36 Thames Water has already commenced modelling work, however in a worst-case scenario where the total process took 20 months to complete from the point of outline consent was granted (assumed to be April 2024) first occupations on the appeal site may not be able to occur until December 2025.

3.37 The sale of appeal site of a housebuilder and preparation of the reserved matters application would run concurrently with the worst case 20 month programme for the completion of enforcements to the foul drainage network (which would commence immediately following the grant of outline planning permission). With reference to the forecast delivery rates (which anticipates first completions in 2026) the need for foul drainage reinforcement works to be completed would not impact on the completion of the development within 5 years.

Appendix I – Catesby Estates Delivery Track Record

Site	Authority	Outline Planning Ref & Address	Number Of Units Approved at Outline	Outline Consent Approved	Site Sold To	Reserved Matters or Full Application Submitted	Time Period from Outline Approval to RM Submission	Development Commenced	Time Period from Outline to Commencement of Development
Bude	Cornwall	E1/2008/02281 Land At Binhamy Farm, Stratton Road, Bude, EX23 9TG	400	July 2011	Bovis Homes	December 2012	14 months	June 2013	23 months
Wooton Hill	Basingstoke and Deane	13/00898/OUT Harwood Paddock, Woolton Hill, Newbury, Hampshire	49	October 2013	Bloor Homes	March 2014	11 months	July 2014	9 months
Dickens Heath	Solihull	2014/1032 Land at Dickens Heath Road, Dickens Heath	130	June 2014	Bellway Homes	January 2015	7 months	June 2015	12 months
Salisbury	Wiltshire	13/00673/OUT Land to the East of A345 and West of Old Sarum, Longhedge Salisbury, Wiltshire	673	March 2014	Bovis Homes	July 2015	16 months	January 2016	22 months
Tingewick	Aylesbury Vale	14/01958/AOP Land Off Main Street, Tingewick	85	December 2014	Bovis Homes	April 2015	4 months	October 2015	11 months
Balsall Common	Solihull	2014/1988 Land Fronting, Kenilworth Road, Balsall Common	115	April 2015	Crest Nicholson	September 2015	5 months	June 2016	14 months
Haywards Heath	Mid Sussex	13/03472/OUT Land at Penland Farm, south of Hanlye Lane and west of Balcombe Road, Haywards Heath	210	January 2015	Redrow Homes	April 2016	15 months	December 2016	23 months
Sherborne	West Dorset	WD/D/14/002286	41	July 2015	Bovis Homes	April 2016	9 months	January 2016	6 months

		Land North Of Bradford Road, Sherborne							
Shefford	Central Bedfordshire	CB/14/01726/OUT Land at Campton Road and rear of Robert Bloomfield Academy, Shefford	130	September 2015	Bovis Homes	December 2015	3 months	July 2016	10 months
Stadhampton	South Oxfordshire	P14/S4105/O Land to the east of Newington Road, Stadhampton	65	May 2016	Bovis Homes	May 2017	12 months	November 2017	18 months
Kedleston	Amber Valley	AVA/2014/0928 Land at Kedleston Road and Memorial Road, Allestree	400	August 2016	Miller Homes	June 2019 *outline subject to JR	34 months* *outline subject to JR	April 2020 *outline subject to JR	44 months *outline subject to JR
Brampton	Huntingdonshire	16/00194/OUT Land North West End of Dorling Way, Brampton	150	September 2016	Bellway Homes	September 2017	12 months	April 2018	20 months
Potton	Central Bedfordshire	CB/16/02590/OUT Land to the south of Sandy Road, Potton	90	November 2016	CALA Homes	July 2017	8 months	February 2018	15 months
Alfold	Waverley	WA/2015/2261 Land west of Sweeters Corpse, Loxwood Road, Alfold	55	April 2016	CALA Homes	June 2017	14 months	July 2018	15 months
Wilstead	Bedford	15/02712/MAO Land to the south and west of Whitworth Way, Wilstead	70	March 2017	Bellway Homes	March 2018	12 months	September 2018	18 months
Battle	Rother District	2017/1259/P Land at Tollgates, Battle	63	November 2017	Viridian Housing	November 2018	12 months	January 2020	26 months
Sudbury	Babergh	DC/17/04052 Land North Of Waldingfield Road, Sudbury	130	July 2018	Anderson	October 2019 *outline subject to JR	15 months* *outline subject to JR	July 2020 *outline subject to JR	24 months *outline subject to JR

Great Gransden	Huntingdonshire	17/01375/OUT Land North East Of Mandene Gardens Great Gransden	40	February 2019	Hayfield Homes	July 2019	5 months	June 2020	16 months
Shefford 2	Central Beds	CB/18/03694/OUT Land at Ivel Road Shefford	90	September 2019	Redrow	October 2019	1 month	April 2020	6 months
Haughley	Mid Suffolk	DC/18/04773 Land To The West Of, Fishponds Way, Haughley, Suffolk	65	May 2019	Bellway	December 2019	7 months	June 2020	13 months
East Horsely	Guildford Borough	19/P/01541 Land rear of Chicane and Quintons, Ockham Road North, East Horsley	110	December 2019	Taylor Wimpey	November 2021	23 months	January 2023	37 months
Alford 2	Waverley	WA/2019/0745 Land east of Loxwood Road, Alford	80	March 2020	Bewley Homes	December 2020	9 months	December 2022	33 months
Crowborough	Wealden	WD/2020/0369/MFA Land North of Walshes Road, Crowborough	100	November 2020	Dandara	October 2021	11 months	January 2023	26 months
Bromsgrove	Bromsgrove	16/1132 Land at Whitford Road and Land at Albert Road, Bromsgrove	490	February 2021	Bellway	January 2022	11 months	March 2023	25 months
Kenilworth	Warwick District	W/18/1635 Land On The East Side Of, Glasshouse Lane, Kenilworth	620	April 2021	Vistry	September 2021	5 months	March 2022	11 months
						Average*	10 months	Average*	19 months
						Median*	11 months	Median*	18 months

*excluding sites subject to Judicial Review which delayed commencement of development