



Planning Policy Team
Vale of White Horse
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Dear Sir/Madam

VALE OF WHITE HORSE LOCAL PLAN PART 1

Thank you for consulting with the Home Builders Federation (HBF) on the Vale of the White Horse Local Plan Part 1 consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following representations and, in due course, participate in the hearings of the Examination in Public.

Core Policy 2: Cooperation on unmet housing need for Oxfordshire

We consider that the plan is unsound because it includes no commitment to undertake a review of the plan by a specified date to meet an element of Oxford City's unmet need. As such, it is hard to conclude that the plan addresses the positively prepared test of the NPPF.

The question of the Duty to Cooperate and planning for the problem of Oxford's unmet housing need is one of the most important issues in relation to the soundness of the Vale of White Horse Council's (VWHC) Local Plan. The question of when the Vale proposes to assist with addressing the problem of Oxford's unmet housing need is not specifically addressed by the submission version of the plan. That Oxford City has a capacity problem is an issue that really should not in dispute although we do note that the surrounding Oxfordshire authorities, including VWHC, persist in being coy about whether

there will be an unmet need at all. This is apparent in the third paragraph of Core Policy 2 which states:

“Whilst the extent to which Oxford City can meet its own needs is robustly tested and agreed, the Council will first seek to meet its own housing needs in full”

The implication behind this statement is that the Vale (and the other Oxfordshire authorities) expect Oxford City to produce and adopt its own plan before it will begin to entertain revising its own plan. This process could take a long time. Oxford City already has a recently adopted core strategy (adopted 2011). Oxford City's Local Development Scheme does not include a programme for the review of its local plan. While Oxford City no doubt will wish to accelerate its own review process in order to address the implications of the 2014 SHMA and have a plan that is fully in conformity with the NPPF by the time if feasibly presents a new plan for examination this is likely to be 2016 at the earliest. Any unmet need that is finally and unequivocally established as part of the subsequent examination process would then have to await the review, examination and adoption of all the other Oxfordshire plans before an aligned Oxfordshire planning strategy could be agreed that apportioned the unmet need across Oxfordshire. This process of review will take a long time. Realistically, an aligned planning strategy for the Oxfordshire authorities that addresses fully the implications of the 2014 SHMA could not finally be in place and delivering outputs until 2020 and even this optimistic timetable would be subject to all the authorities being in agreement. In the meantime there are housing needs identified in the 2014 SHMA that will remain unaddressed. The failure to match the objectively assessed need in full will cause considerable hardship and have far reaching economic consequences for Oxfordshire.

The likely extent of the unmet need in Oxford City is considerable. The 2014 SHMA has established that Oxford City needs between 24,000 and 32,000 dwellings over the period 2011 to 2031. The most recent 2014 update to the SHLAA has assessed the opportunities that exist to develop new housing in Oxford. The latest update (2014) identifies the capacity for 10,212 homes in the period 2011-2031. Therefore, the city can only supply between a half and third of what is needed.

Oxford City Council's website says this about the consequences of the housing need/supply imbalance in the city:

- Oxford needs between 24,000 and 32,000 new homes over the period 2011 to 2031 to meet the City's growing need for housing, as shown by the Oxfordshire Strategic Housing Market Assessment (SHMA).
- Oxford has overtaken London as the least affordable housing location in the UK. The average cost of buying a house in Oxford is more than 11 times the average salary of an Oxford worker.
- Recruitment by the city's businesses, universities, hospitals and schools is difficult, because of a lack of housing choice and affordability. This adversely affects our economy, the quality of our services, and the lives of those living and working in the city.

- Our universities are being held back in the global competition for the best research talent, and outcomes in our public services, such as health and education, are compromised through the lack of available affordable housing for key staff.
- With over half the city's workforce travelling into Oxford and commuting distances increasing, the pressure on our infrastructure is not sustainable, even with improvements to roads and public transport.

Oxford City Council considers an urgent response is needed to deal with Oxford's worsening housing crisis. The City Council is doing its best to find suitable housing sites within the city's administrative boundary, and has commissioned an independent review of potential sites to ensure the capacity of Oxford to provide more housing sustainably is fully established. Yet the boundary is tightly drawn, and there is a shortage of land suitable for housing within the boundary. The City Council is therefore seeking a review of the Oxford Green Belt immediately beyond its boundaries, to allow homes to be built sustainably to meet the needs of current and future generations. This review could also consider extensions to the Green Belt, where appropriate.

In view of these pressures, and Oxford City's call for an 'urgent response' a specific response by the Vale in this iteration of its Local Plan is warranted to assist Oxford City. Delaying this issue for another five years without a clear commitment by the Vale to review its plan by a specified date is unacceptable.

The NPPF does not say that an established but unmet housing need must await the production of a coordinated planning strategy among a number of other neighbouring authorities in a defined housing market area, although in many respects such an approach would represent the ideal planning response. If everyone undertook a coordinated review at the same time then there may be some hope that Oxford City's problems would be confronted. Because the Oxfordshire authorities are not producing new NPPF-compliant local plans to a common timetable we consider that the VWHC needs to provide for an element of the Oxford unmet need in this version of its plan.

There is no timetable in Core Policy 2 that commits the VWHC or the other Oxfordshire authorities to undertake a review by a specified date. As such one cannot conclude that the positively prepared test of the NPPF has been addressed since no assurance is provided that the issue will never be confronted.

We note the Statement of Cooperation. This statement has been agreed between all the Oxfordshire planning authorities. This is helpful insofar as it goes and its preparation and agreement addresses the requirement of paragraph 181 of the NPPF for relevant local authorities to demonstrate evidence of effective cooperation by agreeing a memorandum setting out an agreed position, but it is very light on specific commitments with regard to when the problem of Oxford's unmet need will actually be addressed and the specific spatial form this will take (i.e. where). It is notable that the Statement of Cooperation does not include a date committing all the authorities to a timetable of review. As such it is doubtful whether the Statement serves as an effective planning document that will address the specific requirements of paragraphs 179 and 182 of the NPPF.

It would be helpful to know what progress has been made by the Growth Board with regard to the strategic planning for Oxfordshire to which paragraph 1.21 of the local Plan refers. Unlike the Statement of Cooperation the plan does state that work will be undertaken to establish a *'robust process and timetable'* to consider the growth needs of Oxfordshire. However it goes on to state this work will take at least 12-18 months to complete. We have two concerns in relation to this. Firstly, it is unclear whether this work promised will address the matter of the unmet housing need of Oxford. Secondly, even if it does confront the Oxford issue, the timetable quoted would imply that it might not be until mid-2016 before the Oxfordshire authorities are even in a position to begin to decide how to plan for the issue. Given the time it takes to prepare local plans this does tend to suggest that it will not be until 2020 at the earliest before new plans are prepared to confront the issue. This is ten years into the evidence base (the SHMA sets its base in 2011) and half-way through the life of the plans being produced in Oxfordshire (they uniformly use the 2011-2031 planning period). In the meantime there will be considerable housing hardship in Oxfordshire (because the consequences of the undersupply in Oxford will be felt across the HMA) and the economy will suffer.

We do note, however, that the Statement states in paragraph 5.3 that:

"Should any of the Oxfordshire LPAs be unable to accommodate their objectively assessed need identified in the SHMA, the remaining Oxfordshire authorities must seek to accommodate this unmet need."

Since Oxford City has now established both its need and its capacity – it has identified that it only has capacity to accommodate 10,212 dwellings in total for the period 2011-2031 including windfall supply (see table 11 on pages 54-55 of the Oxford City SHLAA) – the definitive evidence is now available to show that Oxford City cannot meet all its own needs within its administrative boundary. In accordance with paragraph 5.3 of the Statement this ought to trigger the provision for an element of Oxford City's unmet need in the WCHC local plan. While we accept that the new SHLAA has only very recently become available (it was published in December 2014) the problem of the supply/need imbalance in Oxford has been recognised for a long time.

The problem goes back to at least the days of the South East Plan (the Regional Strategy for the South East) and even before this to the Structure Plan with its country towns strategy. It is not credible, therefore, for the VWHC or any of the other hinterland Oxfordshire authorities to continue to deny that there is not an issue with regard to housing supply in Oxford City.

We consider that on the basis of existing evidence, provision should have been made by VWHC in this latest plan to commit to a aligned review with the other authorities, and for this to be completed by a certain date, in order provide for at least an element of Oxford City's unmet needs in addition to meeting its own housing needs in full. We consider that this aligned review would need to be completed by 2017. We are very concerned by the consequences of the collective failure of the surrounding authorities to confront the Oxford City problem. We raised this concern at the Cherwell

examination. We do not consider that the Inspector's conclusions in relation to Cherwell should be read as an endorsement of the approach being taken by VWHC with its plan. Furthermore, the argument that the problem cannot begin to be considered by any of the authorities including VWHC until the latest evidence is available and protocols agreed threatens to defer the issue for ever into the future since it can always be argued that there is new evidence to consider or new processes to establish. No doubt by the time 2020 is reached, the Oxfordshire council's could argue the underlying 2014 SHMA evidence is dated and cannot be relied upon so new evidence must be gathered and new strategic planning frameworks agreed to apportion the unmet need. If new plans are then subsequently published post 2020 then once again the opportunity to address the Oxford City issue will be lost. This piecemeal approach to plan-making in Oxfordshire must stop.

As the VWHC is not prepared to address the Oxford City problem in this version of its local plan, then the plan will need to include a commitment to review the plan by a specified date. The inspector examining the Cherwell local plan did recommend that a review date was agreed. This review date will need to be supported by all the other Oxfordshire authorities to ensure that either the preparation or the review of all the Oxfordshire local plans will be undertaken by a common commencement date. We consider that this preparation or review date should be concluded by 2016. This commitment to a review must include an agreement that the objectively assessed needs identified in the SHMA 2014 will be met by each Oxfordshire authority and that the unmet need for Oxford City will be apportioned among the hinterland authorities.

Core policy 3: Settlement hierarchy

We consider the apportionment of the housing among the settlement categories to be unsound because it will prove ineffective for the delivery of the overall housing requirement.

The Council has delineated a settlement hierarchy. This distributes the housing requirement among the Market Towns, Local Service Centres, Larger Villages and the Smaller Villages. The plan makes specific allocations for settlements falling within the first three categories but none for the Smaller Villages. We consider that it would be helpful for the Plan to provide indicative allocations for the smaller villages so as to provide a guide for the Neighbourhood Plan process.

We note that the Council has considered that there will have been 2,031 completions by March 2015 (completions and estimated completions from 2011). There are further known commitments amounting to 3,169 dwellings.

We note that the policy states that the Council has identified land for 13,960 dwellings through its strategic allocations. A further (the remaining) 1,900 dwellings remain to be identified through the Part 2 Local Plan or through Neighbourhood Development Plans. Of this 900 dwellings may take the form

of windfalls. This would suggest that land for at least 1,000 dwellings still needs to be identified by the Council.

The Council will either need to allocate land for 1,000 dwellings in its Part 2 plan, or it will need to be confident that the Neighbourhood Development Plan process will deliver the housing numbers required.

The Council is approaching a quarter of the way through the life of its plan. We have been unable to locate a timetable for the production of the Part 2 Plan on the Council's website, but it is probably unlikely that the Part 2 Plan will be adopted before 2016. This would leave 15 years of the life of the plan left to deliver the other 1,000 dwellings, or possibly 1,900 dwellings if the windfalls do not materialise in sufficient quantity. If allocating land for the 1,000 to 1,900 depends upon the production of Neighbourhood Plans then this introduces a great degree of uncertainty. This is because the Smaller Villages:

- a) may decide not to produce a Neighbourhood Plan at all;
- b) may agree to produce a Neighbourhood Plan but fail to produce one quickly enough to facilitate the implementation and completion of the remaining 1,000 homes, or else the Neighbouring Forum may fail to gain the necessary support for its Neighbourhood Plan;
- c) once they have an adopted Neighbourhood Plan the detailed matter of making housing land allocations still needs to be agreed and approved;
- d) they may all decide not to allocate land for housing at all. They are entitled to do this and this is entirely possible.

Therefore, the Council is unable to demonstrate that its plan is able to deliver the full housing requirement. As such the plan is unsound. To address this flaw the Council will need to provide evidence that the 1,000 dwellings can be delivered in an alternative way.

We do not consider that this is an issue that can be left to the Part 2 Plan because there is no guarantee that the Part 2 Plan will be produced, examined and adopted quickly enough to enable the delivery of the remaining 1,000 dwellings in time. The Council should bear in mind the NPPG's advice that a single Local Plan should be produced. Additional Local Plans should only be produced where there is a clear justification to do so (ID 12-012-20140306).

Core policy 4: Meeting our housing need

We note the housing requirement of 20,560 new homes between 2011 and 2031, which equates to 1,028 dwellings per annum (dpa). This is consistent with the evidence of the 2014 SHMA (see figure 2 on page 6 of the Executive Summary). The decision by VWHC to plan for 20,560 dwellings is also consistent with the verdict reached at the Cherwell Local Plan examination

where it was concluded that Cherwell Council should plan on the basis of the up-to-date evidence of objective needs as identified by the 2014 SHMA which assesses the need for the housing market area.

Land for the unidentified 1,000 dwellings

As we have argued above, we do not consider it is sound to defer the matter of identifying land for 1,000 (or possibly 1,900) dwellings to the Part 2 Local Plan, Neighbourhood Development Plans, or Development Management process. The Council cannot guarantee that any of these routes will prove efficacious.

This concern increases when one considers the Council's approach to ring-fencing in the Science Vale.

Windfall

We note that the Council has included a windfall allowance for the whole plan period. The NPPF only allows a windfall allowance as part of a council's five year housing land supply where this is justified by compelling evidence. We consider it highly dubious to assume that 900 dwellings will be provided over the first five years of the life of the plan through windfall. Secondly, the Council will need to delineate between its ring-fenced area and the rest of the district and show how many windfalls it anticipates each area will contribute.

Core Policy 5: Housing supply ring-fence

The policy is unsound because it is unjustified and ineffective

We note the Council's intention to ring-fence housing supply in the Science Vale. The plan identifies that some 11,850 homes in total will be provided in the ring-fenced areas (see paragraph 4.11 of *Topic Paper 4: Housing*). While we do not object to the policy *per se* the Council needs to justify the policy better and clarify how this policy will operate alongside maintaining supply in the rest of the district and what contingency measures might be brought into play if this mechanism fails.

We note from paragraph 4.22, that the ring-fence is a sub-set of the wider Science Vale geographical area. Firstly, it is unclear what this sub-set is because Core Policy 4 does not refer to a Science Vale area. We assume that this is the South East Vale Sub-Area because the ring-fenced settlement areas of Wantage, Grove, Harwell and Milton and land in the Vale adjoining Didcot town referred to in this paragraph fall within this sub-area. It would be helpful if the Council delineated the 'ring-fence' from the Sub-Areas, so there were three Sub-Areas and a Ring-Fence.

The implication of the ring-fence is that supply outside of the ring-fence will also need to be ring-fenced, i.e. the Council would need to maintain separate five year housing land supply calculations: one for the ring-fence and one for the remaining non ring-fenced part of the district. Supply in the ring-fence,

therefore, could not be counted towards supply outside the ring-fence because the Council agrees that delivering homes in the ring-fence is needed to support the Enterprise Zone and other business growth prospects (paragraph 4.20). Therefore, it follows that any housing provided in Shrivenham, for example, would not contribute to these objectives and therefore could not count towards the five year land supply calculation of the ring-fenced area. It would be helpful if the plan clarified the Council's thinking in this respect, and provided two separate housing land supply trajectories.

The Council should also clarify whether it envisages any of the unidentified need of 1,900 dwellings will be provided from within the ring-fenced areas. While some of the windfall sites contributing to the windfall allowance of 900 dwellings may come forward, we consider that it is unlikely that any land for the unidentified 1,000 dwellings will be found given the tightly drawn nature of the ring-fence.

We also note that the ring-fenced areas are tightly drawn and are made up of strategic development sites. Our concern is that if the strategic development sites fail to come forward according to the schedule or sufficiently quickly then there will be few (if any) alternative land options to make good the deficit accrued in the ring-fenced area.

The plan should therefore be amended to make it clear that the land required to provide for the remaining 1,000 homes that are required by 2031 will be supplied outside of the ring-fence.

The Council should also apportion the windfall allowance between the ring-fenced area and the rest of the district. This should be based on evidence and a view taken as to whether it is realistic to assume that the ring-fenced areas will continue to be able to contribute windfall supply.

If the ring-fenced area fails to deliver according to schedule (the sites are expected to deliver over the plan period not in the short term as paragraph 4.13 of Topic Paper 4 clarifies) and because there are few alternative land options, we are concerned that there is a potential risk that the plan will fail to provide for the housing needs of the district as a whole. We note that the Council recognises that under-delivery may trigger the need for a review of the plan (see footnote 52 to paragraph 4.17 of *Topic Paper 4*) however, we are not convinced that this allows the Council to treat any 'temporary' shortfall as an exemption from the provisions of paragraph 49 of the NPPF.

The risks associated with the ring-fence serves as another reason to query whether the delegation of the identification of land for the 1,000 dwellings to the Part 2 Plan, Neighbourhood Development Plans, or Development Management process is justified.

Five Year Housing Land Supply

The Council is unable to demonstrate a five year housing supply when a 20% buffer is applied. As such it is questionable whether the Local Plan is deliverable.

We read in paragraph 4.23 of *Topic Paper 4* that the Council considers that it has identified land for 8,047 dwellings and this is sufficient to meet the five year supply for the period 2015-2020 plus address the backlog in the five years. However, the Council says that it is incapable to meeting the implications of the 20% buffer (paragraph 47 of the NPPF) to provide choice and competition in the supply of land where there has been evidence of persistent under-delivery in the past. This would require a supply of land for 8,665 homes. The Council maintains that it does not have suitable sites available to allocate that could make up this shortfall in a sustainable manner (paragraph 4.23).

We are not sure that it is a matter over which the Council can exercise discretion. We acknowledge the challenges associated with providing 8,665 dwellings, but in the circumstances this does point to the importance of the Council having identified sooner specific allocations in the Smaller Villages and opportunities in the Abingdon and Western Vale sub-areas. Deferring the issue of the unidentified 1,000 issue to the Part 2 Plan or the Neighbourhood Plan process has compounded these difficulties. Indeed, given the uncertainties surrounding the preparation of Neighbourhood Plans (and whether these will be prepared at all), the Council ought to have moved sooner to identify specific sites. This would have helped considerably with maintaining delivery as there may be issues relating to market absorption in the ring-fenced areas: i.e. there will a finite number of households seeking to buy/rent in a particular location and settlement each year. This is a problem that the Council itself acknowledges in paragraph 4.25 of *Topic Paper 4*. Providing an array of alternative sites of varying sizes and house types over the district thereby addressing the needs of different segments of the population would have assisted with maintaining delivery according to the overall trajectory for the district. The concentration of the supply in the South East Vale Sub-Area and the ring-fenced areas in particular, compounds this problem. The housing supply in the district is in imbalance and this is causing difficulties for the Council.

We note the discussion in paragraph 4.26 regarding Thames Water. The problems that Thames Water maintains that it faces in servicing plots are not sound reasons to restrict supply and backload the housing trajectory. In law there is a requirement placed upon water and sewerage providers to make provision for new development. Section 37 of the Water Industry Act 1991 places a statutory obligation on water and sewerage companies to provide an adequate water supply while Section 94 of the same Act imposes a statutory obligation on companies to provide adequate sewerage infrastructure to serve the needs of the plan-led system. This includes providing services to meet future development intentions.

As part of the house building industry's contribution to the Water Industry Act 1991 house builders have been required by law to pay an infrastructure

charge to provide for the water services needed to support new developments. Each development scheme has to pay this infrastructure charge to the Water Boards. According to OFWAT – the Government’s water regulator – since 1991 some £2.3 billion has so far been paid by house builders towards investment in water infrastructure in England and Wales.

House builders, therefore, have been paying a substantial levy on each home built in order for water and sewerage providers to provide the infrastructure necessary to enable the housing needs of the Vale to be provided for. The Council and Thames Water therefore will need to demonstrate how the levy that the house building industry has been paying over the years has been invested in providing the water services for the Vale of White Horse district. The Council will need to provide this evidence before it can use water as an excuse not to meet its five year housing land supply requirements (including a 20% buffer for persistent poor past delivery).

Similarly we note on page 3 of the Appendices to the Local Plan that house builders will be required to: “demonstrate that there is adequate water supply capacity and/or waste water capacity both on and off the site to serve the development”. We also note the requirement for “developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure”. These requirements are not justified. These are functions of the water provider not the developer. As described above, the industry has been paying a levy since 1991 in order to fund the provision of such services and the funding of studies.

Core Policy 24: Affordable housing

The policy is unsound. Some parts of the policy conflict with national policy. The requirement that all schemes provide 35% affordable housing is not justified in the light of the viability evidence.

Firstly, the policy will need to be amended to reflect the Government’s national policy to support small scale developers, custom and self-builders. In his Written Ministerial Statement dated 28 November 2014, the Minister for Housing and Planning has stated that affordable housing and tariff style contributions should not be sought from schemes of 10 units or less, or which have a maximum combined gross floor space of 1,000 square metres. Some have doubted whether this is now national policy. The WMS is clear that it is as it states on the first page: “These changes in national policy...”.

The requirement, therefore, that all schemes of 3 units or more should make a contribution of 35% affordable housing will need to be deleted in the light of national policy unless the site is located in a designated rural area under Section 157 of the Housing Act 1985. If the site is located in a designated rural area then the Council may choose to implement a lower threshold of 6 to 10 units, but they will not be able to seek affordable housing or tariff style contributions from schemes of five units or less (see NPPG, paragraph 012 Ref ID: 23b-012-20141128). Furthermore, for schemes of 6-10 then affordable

housing and tariff contributions may be sought as cash payments only and be commuted after the completion of the units.

Secondly, we have some doubts as to whether the Council has demonstrated that a uniform rate of 35% is achievable across the district for schemes of 11 units or more. We have noted the *Local Plan Viability Study*, October 2014. As far as we have been able to ascertain the viability modelling has not considered the effect of 35% affordable housing. Tables 10.1 to 10.5 model 40% affordable housing but not 35% affordable housing. We note that the modelling has factored-in actual S106 and S278 costs (see Table 7.1) but it has not factored-in a CIL, so while we accept that 35% affordable housing should improve viability, once a CIL is factored-in this could jeopardise viability.

We note that Table 10.5 of the viability study shows that at the rate of 40% affordable housing three strategic sites fail to generate values necessary to meet the viability threshold (Monks Farm, Crab Hill and South of Faringdon). The report notes that these sites are unviable on a gross basis but they do become viable when one considers the net figures. We would question this. The correct measure would have to be the gross measure since developers buy sites on a gross basis: i.e. developers do not buy individual plots for houses off the landowner – they have to buy the whole site in order to provide roads, open space etc – elements of a scheme which do not generate a specific sales revenue for the developer. As the developer is only able to develop part of the site as dwellings and it is only these dwellings that generate the sales revenue (the net to gross ratio) judging viability on the basis of the net value would not provide a true guide to assessing viability.

We note that Table 13.1 models 35% affordable housing but assuming 'additional profit'. Unfortunately the short-coming with this particular modelling scenario is that the report's consultants have only considered a S106/S278 of £2,500 per unit (see paragraph 13.7). This contrasts with Table 10.5 which had factored-in the likely true S106/S278 costs involved in bringing forward the strategic sites. Even so, we observe that despite the much lower, assumed, planning obligation payment, Monks Farm and Crab Hill still remain unviable at 35% affordable housing. The site South of Faringdon does become viable with 35% affordable housing but only on the basis of the assumption that these strategic sites will be able to come forward by paying a planning obligation of only £2,500 per unit. This cannot be considered a credible assumption when Table 7.1 indicates that the infrastructure cost for this sites equates to £8,376 per unit (page 101 indicates £8,453 per unit).

On the basis of the Council's own evidence base, we conclude that three strategic sites that will be pivotal to providing for the objective needs of the district, are at risk of being unviable. They are at risk of being unviable with a requirement for 35% affordable housing in combination of other local plan policies and infrastructure requirements. We recommend that the Council undertakes specific viability modelling for 35% affordable housing in conjunction with the planning obligations considered in Table 7.1.

It is also necessary for the Council to consider the costs associated with building to Zero Carbon Homes which will be a mandatory requirement under the Building Regulations in 2015. The NPPG recommends that plan makers consider the effect of changes to national policy where these will come into force in the next five years (see paragraph ID 10-008-20140306). Because Monks Farm, Crab Hill and South of Faringdon will be expected to contribute to the five year housing land supply more evidence needs to be provided to demonstrate whether these strategic sites can sustain 35% affordable housing in combination with infrastructure payments and the effect of the rising building costs associated with the move towards Zero Carbon Homes.

Yours faithfully,

James Stevens
Strategic Planner

