

Purbeck Local Plan Review 2019

Matter E: Housing

Further Representations

Tuesday 6 August 9.30am

	Consultee ID	Name/Organisation
1	1188328	Wareham Town Council Neighbourhood Plan Steering Group
2	996484	Home Builders Federation
3	1190589	Wyatt Homes (Deans Drove, Lytchett Matravers)
4	1191253	Catesby Estates Ltd
5	1191015	Mrs Mandy Backhouse
6	1191476	Residents of Glebe Road
7	1190535	Ms Naomi Pickard
8	1187112	Wool Flora & Fauna Group
9	1185234	Mrs Rachel Palmer
10	1192344	Trees for Dorset
11	1191216	Mr J Lloyd
12	1191219	Westcoast Purbeck Ltd
13	1190450	Mr & Mrs Hayles
14	1188470	Moreton Parish Council
15	1188067	Welbeck Land
16	1191908	Dr Andrew Langley
17	1190024	Wyatt Homes (Upton & Lytchett Matravers)
18	1190693	Lulworth Estate, Redwood Partnership, Mr A Jackson
19	1191125	Bellway Homes Ltd & A F Baggs
20	1190993	The Moreton Estate
21	1192742	Retirement Housing Consortium
22	1191135	Halsall Homes
23	1188986	Mr Anthony Hazell
24	1187487	Mr David John Clark
25	1186743	Natural England

Examination of the Purbeck Local Plan

Further statements based on Inspector’s Matters, Issues and Questions

Submitted by Wareham Neighbourhood Plan Steering Group (ID 1188328)

MATTER E: Housing

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Issue 2: Housing Land Supply (Policy H2)

Q3. Are the Wareham and Bere Regis Neighbourhood Plans capable of making the allocations relied upon by policy V1 and H2 of the Local Plan?

1. The details of how the Wareham Neighbourhood Plan proposes to deliver the 300 new homes including windfall, as specified in Policy V1, are set out in the submission draft of the Wareham Neighbourhood Plan¹ – a copy of which has been submitted in relation to Matter D.
2. As explained in response to Mater D, the plan includes 6 site allocations within the existing settlement boundary (Policies H5-H8 and GS2) which are estimated as likely to deliver 140 new dwellings over the plan period. It also includes a windfall estimate of 100 dwellings within the settlement boundary (which is evidence-based, having considered the previous rate of windfall development (10dpa) and likely sites with potential (which would appear to support such an extent) and assumed a discounted rate in order to provide greater flexibility).

¹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/neighbourhood-planning-purbeck/pdfs/in-progress/wareham/submission-draft-wareham-neighbourhood-plan-2018-10-12.pdf>

3. This leaves a further 60 dwellings required, which cannot be met within the existing development boundary. Having looked at all the available options, the preferred site is land currently within the Green Belt, west of Westminster Road (policy H4). Because paragraph 136 of the NPPF states that neighbourhood plans can amend the Green Belt, but only when the “need for changes ... has been established through strategic policies”, this additional site cannot be allocated until such time as the Local Plan acknowledges the strategic need for the Green Belt to be changed. As such, it is proposed that this policy / site allocation will be added through an early review of the Neighbourhood Plan, once the revised Local Plan has been adopted.

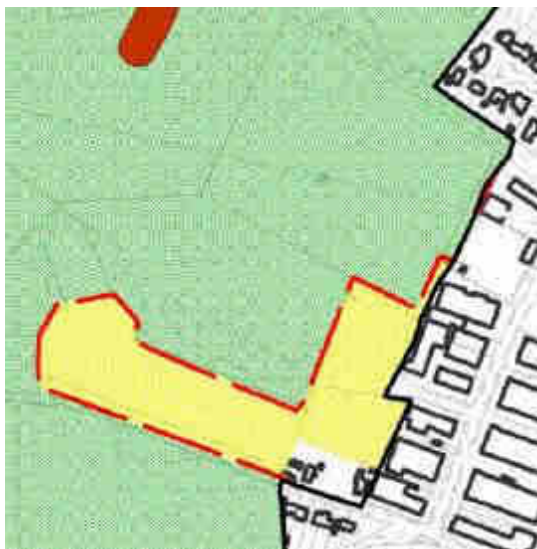
Potential Housing Delivery		
Site	Dwellings	Notes
West of Westminster Road (H4)	60	Subject to change in Green Belt boundary in Purbeck Local Plan
Westminster Rd Industrial Estate (H5)	30	Whole site may not come forward in Plan period - assume 33% of 90 dwell.
Johns Road (H6)	15	Whole site may not come forward in Plan period - assume 50% of 30 dwell.
Hospital/Health Centre site (H8)	40	Subject to relocation of health facilities
Former Middle School site (GS2)	35	Extra care housing / keyworker housing / care home in association with proposed health hub
Cottees site (H9)	10	
Former Gasworks site (H7)	10	
Windfall	100	Assume 66% of average small sites windfall development of 10 dwellings p.a. over 2003-17
Total	300	

Table 1. Summary of Potential Housing Delivery

4. Policy H4 (land West of Westminster Road) is therefore very much dependent on the Green Belt alteration, but as per our earlier submission we would request that the exact detail of this boundary amendment should be detailed through the Neighbourhood Plan. This has implications for the wording included in Policy V2. The current differences in terms of the area to be removed are shown below (the Local Plan shading, the Neighbourhood Plan as pink diagonal hatching) – but further changes could become necessary either as a result of the Examination or in a future review of the Neighbourhood Plan.

Figure 1 Local Plan policies map

Figure 2 Submission Version of Wareham NP policies map



5. A better form of wording for Policy V2 would therefore be:

Policy V2: Green belt
 Green belt boundaries have been amended at Lytchett Matravers, and Upton and will be amended at Wareham through the Neighbourhood Plan, to support sustainable development. The impact of removing

land from the green belt should be offset with the creation of suitable alternative natural greenspace (SANG) at Lytchett Matravers and at Wareham.

The Council will protect...

6. A slightly different wording may be appropriate should Lytchett Matravers Parish Council also wish to take a lead in deciding the exact Green Belt boundary changes in its area (as although its Neighbourhood Plan has been made, it had wanted to identify the preferred areas for development but had been prevented from doing so because of the wording on the NPPF at that time.

Issue 4: Other housing policies (Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15).

Q3. (a) Would policy H8 apply in settlements covered by an existing Neighbourhood Plan that includes housing allocations and if so, what are the implications of this?

7. As currently worded, we believe that Policy H8 would be interpreted as allowing further housing (of up to 30 dwellings per site x unlimited times) to come forward through the normal planning process on sites adjoining the settlement boundary that have not been allocated through the Neighbourhood Plan. This includes land within the AONB and Green Belt land (although the latter is restricted to infill sites between existing buildings²).
8. The approach contrasts with the suggestion put forward by the District Council as part of the consultation undertaken in January 2018, which specifically stated that “The policy would not apply in areas where there is an adopted Neighbourhood Plan which allocates land for housing.”(see consultation leaflet, **Appendix 1**)
9. It is difficult to quantify how much additional housing this policy would generate within the Neighbourhood Plan area. Our site assessment process, carried out by independent experts AECOM, considered 24 sites in and around Wareham (both within and outside the defined settlement boundary, including all sites identified in the strategic housing land availability assessment), but there could potentially be others. Of the sites that were assessed, 4 sites were rated ‘green’ in being the most suitable, a further 9 sites as ‘potentially suitable’ but having more significant constraints, and the remaining sites considered to be wholly unsuitable. The report examined a wide range of factors, including flood risk, ecological impacts, access issues over and above the reference to landscape character and value contained in Policy H8 (b). Without these additional factors as part of the assessment a different view may have been reached.
10. Extracts from the site assessment process and conclusions are contained in **Appendix 2**.
11. There are a number of concerns that arise from this policy approach:
 - National planning policy is clear that Neighbourhood Plans have a key role in identifying and allocating appropriate small and medium sized sites (NPPF paragraph 69) – this policy negates the need for developers and landowners of small sites to engage in the Neighbourhood Plan process
 - The policy could lead to a significant number of houses on sites coming forward, given that there is no upper limit, which goes against the concept of a plan-led system in which the local community have genuine involvement

² We note the proposed modification to H8 (MM7) that seeks to clarify further how potential infill sites within the Green Belt are to be considered which proposes to remove reference to ‘around the edges’ of towns and villages – but this still leaves uncertainty in terms of how ‘within’ a settlement is defined if this does not reference the settlement boundaries where these exist.

- The lack of any defined guidance on the likely level of development creates difficulties in established the infrastructure requirements that may be needed locally and plan for these effectively
- There will be no incentive to bring forward rural exception sites (albeit that Policy H2 as drafted effectively rules such options out within the Wareham Neighbourhood Plan area – which makes it even less logical that an exception should be made for small sites that are less likely to meet local needs)
- As a result, this approach could significantly undermine community support for Neighbourhood Planning.

(b) Would this be consistent with national policy?

12. Paragraph 15 of the NPPF stresses that “The planning system should be genuinely plan-led” and that these should be specific, deliverable and developable, which can only reasonably be interpreted as identifying sites with a degree of certainty.
13. Paragraph 67, which states that “planning policies should identify a sufficient supply and mix of sites”. In terms of small and medium-sized sites, paragraph 68 goes on to states that these should be identified through the development plan and brownfield site registers. Where it does refer to windfall sites, this is only within settlements, and not outside on greenfield land.

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;

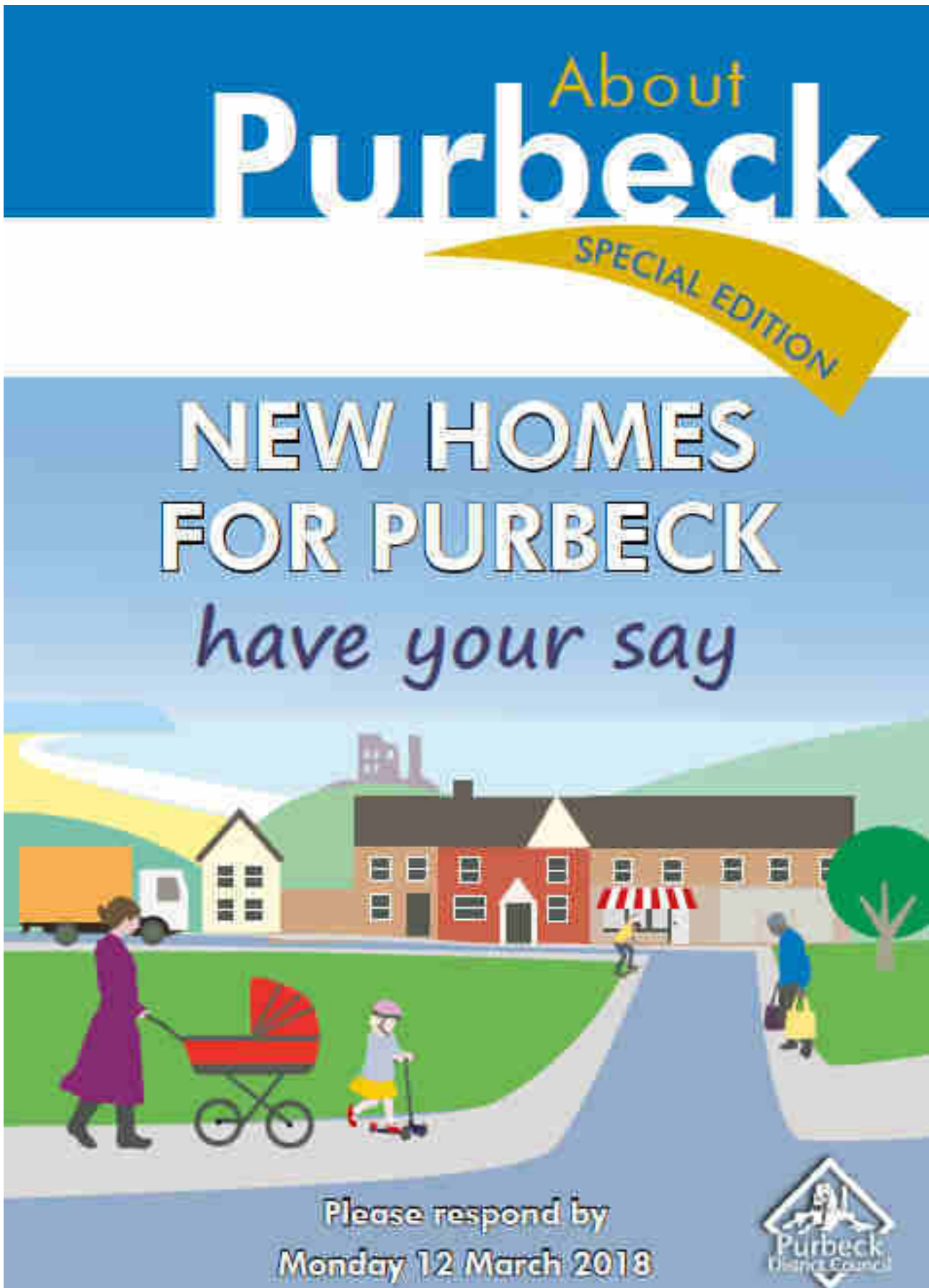
c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

14. It would therefore be appropriate to instead use the Neighbourhood Plan process as a means of allocating sites outside of the defined settlement boundaries (and in other locations where no Neighbourhood Plan is proposed, it should be possible to allocate sites through non-strategic policies in the next review of the Local Plan).
15. If the decision is made that Policy H8 should be retained, then at the very least it should include a future criterion:

“(d) the site does not lie within a Neighbourhood Plan area where small sites have been either been allocated to meet identified housing needs, or where site allocations are being proposed and the plan has reached pre-submission consultation stage.

Appendix 1 – “NEW HOMES FOR PURBECK” consultation leaflet extracts



New small sites policy

All options include focusing the majority of development in two or more areas. Some options also include some development spread across the district. This means that there would be much smaller sites in addition to the bigger site proposals.

The Council is considering introducing a policy which would enable small housing sites to be developed outside existing town and village boundaries, where certain conditions are met. At present, homes are not generally permitted outside town and village boundaries unless there are exceptional circumstances, such as the provision of a significant number of affordable homes. The Council is considering relaxing this requirement to help ensure the continued vitality of towns and villages. If the new small sites policy is introduced, the Council is proposing to include the following criteria to ensure smaller housing developments are in keeping with the distinctive character of Purbeck:

- Housing developments will need to be near existing buildings in the nearest town or village.
- The numbers of new homes would need to be in keeping with the size of the nearest town or village (and should not exceed 30 homes).
- Housing should not harm the landscape or town or village character, or heritage designations.
- For villages within the Green Belt, only limited development that fills gaps between existing houses will be permitted.
- New homes built under the small sites policy would be restricted so that they could not become second homes. We will also encourage an appropriate mix of sizes of homes.

New small sites policy continued on next page...

...New small sites policy continued

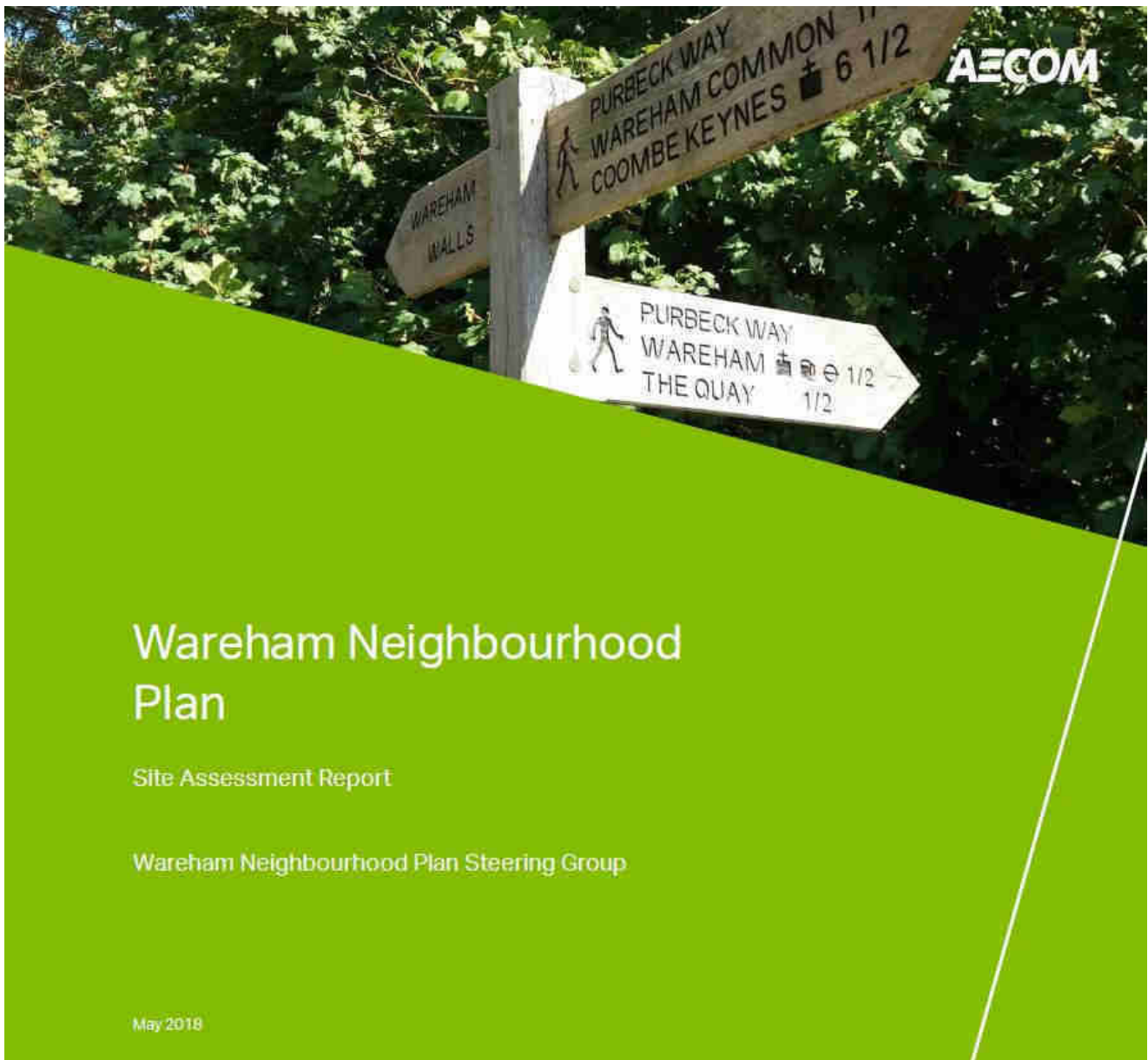
The Council estimates that up to 250 homes including 30 at Sandford (see below) could be delivered at small sites, if this policy were to be introduced. Any sites put forward under this policy would have to go through the normal planning application process for approval.

This policy would apply at the following towns and villages:

- Towns: Swanage, Upton and Wareham
- Key service villages: Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford and Wool
- Local service villages: Langton Matravers, Stoborough, West Lulworth and Winfrith Newburgh
- Other villages: Affpuddle, Bloxworth, Briantspuddle, Chaldon Herring, Church Knowle, Coombe Keynes, East Burton, East Knighton, East Lulworth, East Stoke, Harmans Cross, Holton Heath, Kimmeridge, Kingston, Lytchett Minster, Morden (East and West), Moreton, Moreton Station, Organford, Ridge, Studland and Worth Matravers

The policy would not apply in areas where there is an adopted Neighbourhood Plan which allocates land for housing.

Appendix 2 – extracts from Wareham Neighbourhood Plan Site Assessment Report



Prepared for:

Wareham Neighbourhood Plan Steering Group

Prepared by:

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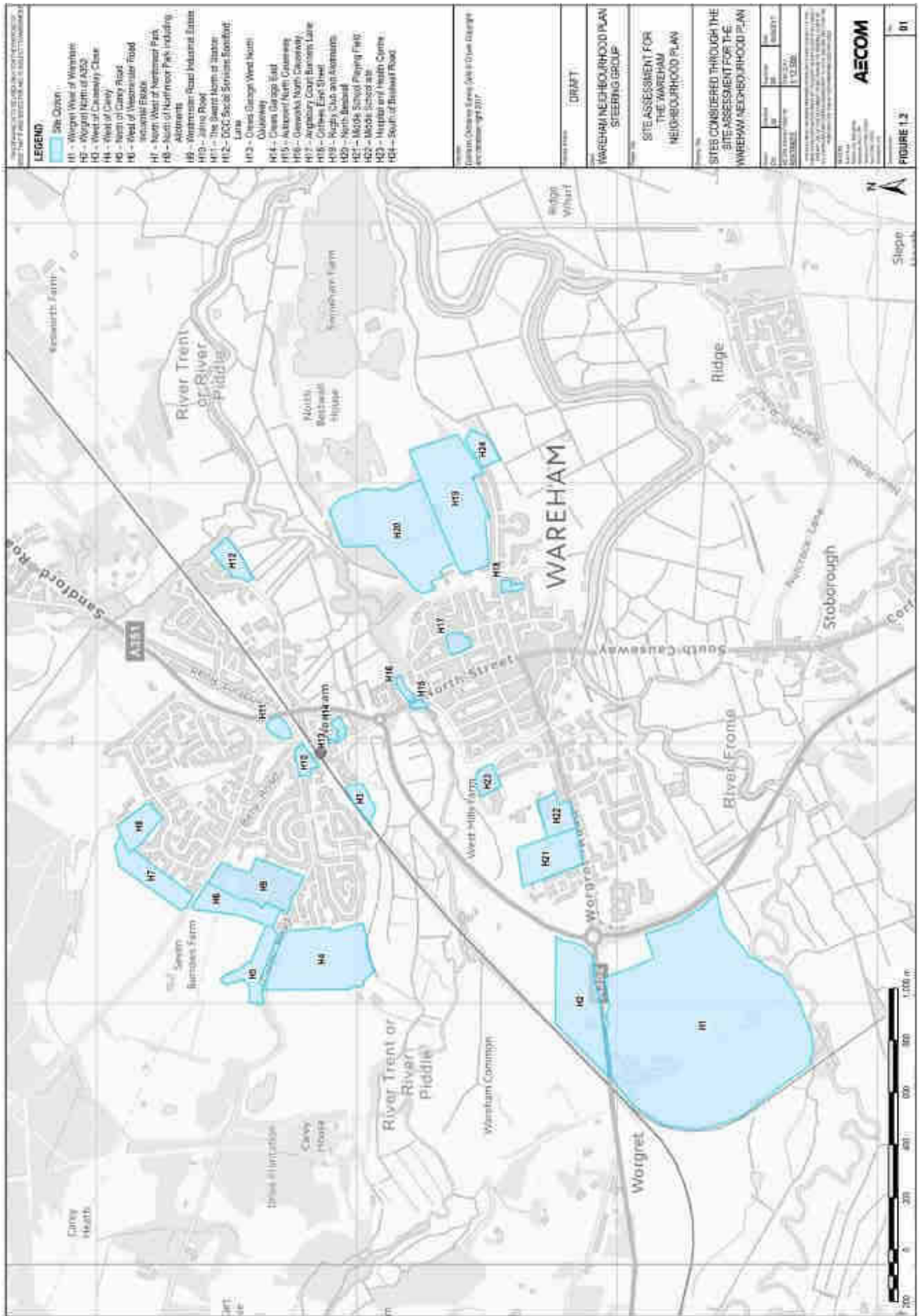


Table ES1: Sites considered within the appraisal and their appropriateness for taking forward for the purposes of the Neighbourhood Plan

Name	Appropriate for taking forward for the purposes of the Neighbourhood Plan?
Site 1: Worgret West of Wareham	No Whilst the site could deliver a significant number of dwellings, development of the site would be contrary to national policy involving major development within the Dorset Area of Outstanding Natural Beauty. It would result in a notable change to the settlement pattern of Wareham by the creation of a separate community detached from the town by the bypass. It would also detract from the setting of the town and be prominent in views from the Purbeck Ridge to the south. Additional constraints relating to landscape character, ecology, flood risk and access, are particularly significant in the local context.
Site 2: Worgret North of A352	No Development of the site would result in a change to the settlement pattern of Wareham by the creation of a separate community detached from the town by the bypass. The ecological value of the site and the potential access and safety issues present additional constraints. As such, the site is considered as unsuitable for taking forward for the purposes of the Neighbourhood Plan.
Site 3: West of Causeway Close	Potentially The main constraints to development relate to landscape, ecology and flood risk. Nonetheless, the site is potentially suitable for development if the constraints can be resolved, although great care would need to be taken to maintain screening of views from the bypass.
Site 4: West of Carey	No Development on the site would result in notable changes to the existing landscape character and visual amenity of the site, which is prominent in views from the Wareham Common and bypass. Additional constraints include the surrounding ecology, the infrastructure on the site and its location away from services and facilities, significant in the local context.
Site 5: North of Carey Road	Yes Landscape and ecology issues provide constraints to what is an otherwise a relatively unconstrained site. Due to the topographical setting of the site which is low-lying, any future development could nestle into the landscape providing that the existing green infrastructure is retained, minimising any changes to the existing visual amenity of the site.
Site 6: West of Westminster Road Industrial Estate	Potentially The main constraints to development concern the existing infrastructure on the site and its location away from Wareham town centre. Development of the site would also result in a loss of green belt land. As such, the site is considered as potentially suitable for development providing the existing constraints can be overcome.

Name	Appropriate for taking forward for the purposes of the Neighbourhood Plan?
Site 7: North West of Northmoor Park	No Landscape, ecology and location issues provide constraints to this site which has a sensitive landscape character due to its visibility from the Greenway, which links the town to Wareham Forest and to internationally important nature conservation sites. Additionally, development would also result in the loss of green belt land. As such, the site is considered as less suitable to take forward for the purposes of the Neighbourhood Plan.
Site 8: North of Northmoor Park including Allotments	No Overall, the main constraints to development concern the potential ecological value and landscape sensitivity of the site, and its distance from Wareham town centre. An additional constraint includes its prominence in views from the Greenway which links the town with Wareham Forest and internationally important nature conservation site. Redevelopment of the site would also lead to the loss of well-established allotments which currently benefit the local community.
Site 9: Westminster Road Industrial Estate	Yes Due to the limited number of constraints, there is the potential to regenerate the site to provide housing or mixed-use development. This would be in line with national policy which supports the development of brown field land and the need to explore all other opportunities are explored before altering green belt boundaries. There is also the potential to enhance the visual amenity of the site through sustainable design.
Site 10: Johns Road	Yes Due to the limited number of constraints, there is the potential to regenerate the site to provide housing or mixed-use development. This would be in line with national policy which supports the development of brown field land and the need to explore all other opportunities before altering green belt boundaries. There is also the potential to enhance the setting of the historic Railway Station which is within close proximity to the site, respecting its character and enhancing the approaches to the town.
Site 11: The Sward North of Station	No The main constraints to development include the potential safety concerns, noise pollution and air quality issues generated from the traffic using the roads which surround the site, which are particularly significant in the local context. Additional constraints to developing the site include its sloping topography and proximity to ecological and historical features of interest.
Site 12: Sandford Lane – potential extension to employment land	No The main constraints to development include its proximity to ecologically protected sites, flood risk areas and protected landscapes. However the site is well screened in views from the south. The site may however be potentially appropriate for employment purposes.

Name	Appropriate for taking forward for the purposes of the Neighbourhood Plan?
Site 13: Crews Garage West North Causeway	Potentially Ecological and landscape issues provide constraints to what is otherwise a relatively unconstrained site. However the site is within proximity to land located within Flood Risk Zone 3, where development would be subject to consultation with the Environment Agency. As such, the site is considered to be potentially suitable for regeneration, providing that the development respects the local landscape character supports the enhancement of the approaches to the railway station and to the town, and demonstrates any potential community benefits.
Site 14: Crews Garage East	Potentially Ecological and landscape issues provide constraints to what is otherwise a relatively unconstrained site. However the site is within proximity to land located within Flood Risk Zone 3, where development would be subject to the Environment Agency's viability and sequential test. Redeveloping the site has the potential to support the enhancement of the approaches to the railway station and to the town, providing that the development respects the local landscape character, retains the surrounding green infrastructure and demonstrates any potential community benefits.
Site 15: Autopoint North Causeway	Potentially Ecological, landscape and historic environment issues provide constraints to an otherwise relatively unconstrained site. However the site is within proximity to land located within Flood Risk Zone 3, where development would be subject to the Environment Agency's viability and sequential test. Redeveloping the site has the potential to enhance its setting within the Wareham Conservation Area and enhance the community vitality of the local town centre.
Site 16: Gasworks North Causeway	Potentially Ecological and historic environment issues provide constraints to an otherwise relatively unconstrained site. However the site is within proximity to land located within Flood Risk Zone 3, where development would be subject to the Environment Agency's viability and sequential test. Redeveloping the site has the potential to enhance its setting within the Wareham Conservation Area and enhance the community vitality of the local town centre.
Site 17: Anglebury Court Bonnets Lane	Potentially Ecological and historical environment issues provide constraints to an otherwise relatively unconstrained site. The site is therefore potentially suitable for development subject to the relocation of existing uses as part of the Wareham Living and Learning Initiative.
Site 18: Cottees East Street	Yes Ecological and historical environment issues provide constraints to an otherwise relatively unconstrained site. Redeveloping the site has the potential to enhance its setting within the Wareham Conservation Area and contribute towards the housing target for Wareham.
Site 19: Rugby Club and Allotments	No The main constraints to development relate to the potential impacts to the surrounding ecological sites, landscape character and also from the potential flood risks. Additionally, redevelopment of the site would lead to the loss of well-established community facilities, significant in the local context.

Name	Appropriate for taking forward for the purposes of the Neighbourhood Plan?
Site 20: North Bestwall	No Overall, the main constraints to development includes the European and nationally important ecological designations which border the site, its landscape setting within the Green Belt and AONB, the potential risks of flooding and the access issues. As such, the site is considered less suitable to take forward for the purposes of the Neighbourhood Plan.
Site 21: Middle School Playing Field	No The main constraints to development relate to the potential impacts to the surrounding ecological sites and the landscape character. Additionally, the covenant on the site restricts its use to educational. Residential development is not currently possible, and therefore the site is not suitable for the purposes of the Neighbourhood Plan.
Site 22: Middle School Site	Potentially The ecological and landscape issues provide constraints to an otherwise relatively unconstrained site. The regeneration of the site into a local 'health hub' has the potential to release other sites of public sector land for development, centralise facilities in one area and enhance the community benefits for local residents.
Site 23: Hospital and Health Centre	Potentially The main constraints to development concern the ecological surroundings and the presence of nationally designated historical sites of interest within and adjacent to the site. Nevertheless, the site is considered to be potentially suitable for development providing the constraints are resolved and the existing community benefits are retained or enhanced, where possible.
Site 24: South of Bestwall Road	No Overall, the site is heavily constrained by the surrounding ecological sites, landscape sensitivity and potential risk of flooding. Additionally, redevelopment of the site would lead to the loss of Greenbelt land.

PURBECK LOCAL PLAN EXAMINATION
MATTER E - HOUSING

Inspector's issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 3rd December 2018. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document dated 10th May 2019.

Issue 2: Housing Land Supply (*Policy H2*)

Q1. Is the distribution of housing as set out in policy H2 (*The housing land supply*) consistent with the overall spatial strategy?

The distribution of housing set out in Policy H2 is consistent with the spatial strategy set out in Policy V1.

Q2. Is the housing land supply as set out in policy H2 likely to achieve delivery of the types of housing identified as being necessary in the SHMA [SD20 and SD21] and to be provided for through policy H9?

The inter-relationship between Policies H2 and H9 is poorly set out so it is difficult to determine if the Local Plan will achieve the delivery of the types of housing identified in the SHMA.

Q3. Are the Wareham and Bere Regis Neighbourhood Plans capable of making the allocations relied upon by policy V1 and H2 of the Local Plan?

At the time of the Purbeck Local Plan Examination it is noted that the Bere Regis Neighbourhood Plan referendum has been held but the Neighbourhood Plan is not yet "made" by the Council and the Wareham Neighbourhood Plan referendum has not yet been held. Therefore some uncertainty exists about the reliance upon the proposed allocations for 105 dwellings in Bere Regis Neighbourhood Plan and 191 dwellings in Wareham Neighbourhood Plan (excluding 9 consented dwellings on Cottees site and windfall allowance of 100 dwellings).

Q4. Is there compelling evidence to indicate that 933 dwellings (35% of the housing land supply) will come forward from small sites next to existing settlements and windfall sites within existing settlements (except Wareham)?

National policy permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue

to be a reliable source of supply. As set out in Document SD38a historically the average completion rate from windfall sites is 76 dwellings per annum and the Council's proposed windfall allowance is 46 dwellings per annum plus a windfall allowance of 100 dwellings in Wareham Neighbourhood Plan (also see answer to Issue 3 Q1(d) concerning inclusion of windfall sites in 5 YHLS calculation and potential double counting).

There is less compelling evidence about the number of dwellings which will come forward from small sites next to existing settlements as set out in Policy H8. There is also a lack of distinction between windfall sites within existing settlements and small sites next to existing settlements because Policy H8 refers to "adjacent to existing homes in the closest town or village" and "on sites positioned in-between existing buildings within and around the edges of towns and villages".

Q5. The housing background paper [SD19] indicates that the approach taken in the Plan not to allocate small sites but rather to include a small sites policy (policy H8) is intended to allow greater flexibility and deliverability of suitable housing. Is this justified and is such an approach consistent with national policy as set out in paragraph 68 of the Framework?

The 2019 NPPF (para 23) sets out that the Local Plan should provide a clear strategy to bring forward sufficient land at a sufficient rate to address housing needs over the plan period which means planning for and allocating sufficient sites to deliver the strategic policies and priorities of the Local Plan. As identified in Q4 35% of the Council's HLS is not allocated. The Council's approach is inconsistent with the 2019 NPPF (para 68) because to promote the development of a good mix of sites, land for at least 10% (circa 268 dwellings) of the housing requirement should have been identified on sites no larger than one hectare in the Local Plan. The Council has not allocated small sites but instead proposes to rely upon Policy H8. Furthermore if the Council's windfall allowance of 46 dwellings per annum as set out in Document SD38a (46 x 16 years = 736 dwellings) is deducted from 933 dwellings then small sites next to existing settlements (Policy H8) are expected to contribute only 197 dwellings over the plan period which is less than 10%. The Council has not demonstrated strong reasons for not allocating small sites nor achieving the target of at least 10%.

Q6. How has flexibility been provided in terms of the potential supply of housing land?

There is no flexibility in the Council's HLS to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum ceiling or to provide choice and competition in the land market. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but a high dependency upon one or relatively few large strategic sites or particular settlements / localities necessitates greater numerical flexibility than if HLS is more diversified. The HBF always suggests as large a contingency as possible to achieve maximum flexibility.

Q7. In order to identify all components that make up the housing land supply should the Plan identify completions since the start of the plan period and commitments (dwellings with planning permission, or with a resolution to grant permission subject to a planning obligation)?

All components of HLS from the start of the plan period should be identified including completions and existing commitments.

Q8. (a) Does the housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period?

The Local Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. Currently the housing trajectory shows insufficient detail to demonstrate that housing development will come forward as proposed.

(b) The change (MM4) indicated in the schedule of possible modifications [SD14] indicates the intention to update the housing trajectory graph to reflect the latest available information on delivery and phasing for allocated sites. What would be the effect of this? Is this necessary to ensure the Plan is sound?

The housing trajectory should be updated to reflect the latest available information. It is necessary for soundness. The inclusion of an updated detailed housing trajectory would enable effective monitoring of the Local Plan.

Issue 3: 5 Year Housing Land Supply

Q1. The Framework (paragraph 74) indicates that a five-year supply of deliverable housing sites, with the appropriate buffer can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement. Detailed advice on this process is set out in the PPG chapter *Housing and Economic Land Availability Assessment 4* where it is described as ‘confirming’ the 5-year housing land supply. The PPG indicates that if a Local Planning Authority wishes to use this process to confirm its five-year housing land supply it must indicate the intention to do so when publishing the plan for representations at Regulation 19 stage. The Housing Background Paper [SD19] was published in October 2018 alongside the pre-submission draft of the Plan at Regulation 19 stage. It states that the five-year housing land supply will be demonstrated and tested through the examination process and then refreshed through an annual position statement. In the light of this:

(a) Is it robustly demonstrated that at adoption the Plan will deliver a 5-year housing land supply at adoption and that this can be maintained throughout the Plan period, calculated in accordance with national

policy and guidance, taking account of past delivery performance and applying the appropriate 10% or 20% buffer?

The Council's latest 5 YHLS is set out in Document SD38a published in May 2019. It is understood that the Council's Examination Hearing Statement to be submitted on 7th June 2019 will include an updated housing trajectory. It is noted that there is a discrepancy between the HLS of 984 dwellings for 2019/20 – 2024/25 shown in the detailed housing trajectory which informed the Local Plan dated January 2019 set out in Document SD53 and the 5 YHLS of 1,403 dwellings for 2019/20 – 2024/25 set out in Document SD38a. If the Council cannot demonstrate a 5 YHLS on adoption of the Local Plan nor maintain a 5 YHLS throughout the plan period then the Local Plan cannot be found sound. At the Hearing Session the HBF may make further comments dependent upon changes contained in the updated housing trajectory in the Council's Hearing Statement.

(b) What is the current position with regard to housing supply?

See answers to Q1(a) above and Q1(c) below.

(c) Is there a 5-year supply?

As set out in SD38a the 5 YHLS for 2019/20 – 2014/25 is calculated as 6.8 years.

(d) How has this been calculated?

This is calculated based on :-

- Local Housing Need (LHN) figure of 168 dwellings per annum multiplied by 5 years = 840 dwellings ;
- Plus shortfall of 95 dwellings in 2018/19 (LHN of 168 dwellings less 73 completed dwellings) ;
- Plus buffer of 10% because the Council is seeking to confirm 5 YHLS at the examination of the Local Plan and thereafter by an Annual Position Statement = 1,029 dwellings (206 dwellings per annum).

- HLS of 1,403 dwellings including 502 dwellings from sites with planning permission, 42 dwellings allocated in Bere Regis Neighbourhood Plan, 39 dwellings allocated in Swanage Local Plan, 505 dwellings allocated in Purbeck Local Plan, 85 dwellings from small sites (17 dwellings per annum) and windfall allowance of 230 dwellings (46 dwellings per annum).

It is noted that the Council's 5 YHLS calculation incorporates both small site and windfall allowances for five years. It is contended that if such allowances are calculated for a full five years rather than only two or three years at the latter end of the period there is a likelihood of double counting because completions from small sites and windfalls in the first, second and third years are most likely to have been consented already and included as sites with planning permission.

There is limited detailed evidence on lead in times and delivery rates of individual housing sites. Since the pre submission consultation it appears that expected housing completions from allocated sites have moved forward.

If the LHN figure is increased then the 5 YHLS re-calculation would be less than 6.8 years.

Issue 4: Other housing policies (*Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15*).

Q1. (a) Are the specific requirements of policy H3 (*New housing development requirements*) justified, effective, likely to be viable and consistent with national policy?

The requirement for electric vehicle charging points (EVCP) and infrastructure for superfast broadband connectivity in Bullet Point (g) are not justified, effective, viability tested or consistent with national policy.

(b) Is the change to the policy (MM5) indicated in the schedule of possible modifications [SD14] necessary for the Plan to be sound?

A modification to Bullet Point (g) is necessary for soundness but MM5 as proposed may not be the most appropriate change. The HBF preference is deletion of Bullet Point (g).

(c) Is the wording of the policy effective and sufficiently clear and precise for development management purposes having particular regard to paragraph 16 of the Framework?

Bullet Point (g) of Policy H3 is ineffective because it is insufficiently clear and ambiguous contrary to the NPPF (para 16). The type of EVCP required is not specified. It is not clear if an AC Level 1 EVCP (slow or trickle EVCP which plugs into a standard outlet) or an AC Level 2 EVCP (delivering more power to the vehicle to charge it faster in only a few hours) is required. These requirements have different implications for both service providers and on viability assessment.

Superfast broadband connectivity is also not defined. It would be inappropriate for the Council to stipulate standards higher than current Part R1 of the Building Regulations "Physical Infrastructure for High Speed Electronic Communications Networks".

Q5. (a) Does policy H9 (*Housing mix*) provide enough clarity on how development proposals will be assessed in terms of the type and mix of housing?

Further clarity on the assessment of the type and mix of housing development proposals should be provided (see answer to Q5(c)).

(b) Are the requirements of the policy particularly in relation to self-build plots and single storey homes justified by robust evidence, effective, likely to be viable and consistent with national policy?

Under Policy H9 (Bullet Point (a)) on housing sites of 20 or more dwellings 5% of market dwellings will be offered for sale as serviced self / custom build plots. Under the Self Build & Custom Housebuilding Act 2015 the Council has a duty to keep a Register of people seeking to acquire self / custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self / custom build. These are :-

- developing policies in the Plan for self / custom build ;
- using Council owned land if available and suitable for self / custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self / custom build and where the landowner is interested facilitating access to entrants on the Register ; and
- working with custom build developers to maximise opportunities for self / custom housebuilding.

A specific policy requirement for 5% self / custom build plots on residential development sites of more than 20 dwellings should not be sought. This policy requirement seeks to place the burden for delivery of self / custom build plots on developers contrary to national guidance which outlines that the Council should engage with landowners and encourage them to consider self / custom build. The Council's proposed policy approach should not move beyond encouragement by requiring provision of self / custom build plots on residential development sites of more than 20 dwellings.

All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020) which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). In June 2018 there were 88 entries on the Council's Register. There is no evidence of an analysis of the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites of 20 or more dwellings. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self / custom build but it cannot be reliably translated into actual demand should such plots be made available.

The Council's policy approach should be realistic to ensure that where self / custom build plots are provided they are delivered and do not remain unsold. It is unlikely that the allocation of self / custom build plots on housing sites of

more than 20 dwellings can be co-ordinated with the development of the wider site. At any one time there are often multiple contractors and large machinery operating on a housing site from both a practical and health & safety perspective it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. If demand for plots is not realised there is a risk of undeveloped plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS. Where plots are not sold it is important that the Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site after the marketing period has finished to build out plots which have not been sold to self / custom builders.

It is noted that there are numerous single and smaller sites with planning permission included in the Council's HLS (see Appendix A of Document SD38a) as well as the policy approach to small site development next to existing settlements under Policy H8 and a windfall allowance of 46 dwellings per annum providing ample opportunities for self / custom builders. This suggests sufficient supply against a minimal demand without a policy requirement for 5% self / custom build on sites of 20 or more dwellings.

As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly viability test the Plan in order that the cumulative burden of policy requirements are set so that most development is deliverable without further viability assessment negotiations and the deliverability of the Plan is not undermined. The Council's viability evidence assumes no impacts without providing any factual supporting evidence for this assumption. It is not clear if the Council has considered the loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. The inclusion of self / custom build plots on sites of more than 20 dwellings may also have a detrimental impact upon the level of affordable housing provision achieved on such sites. The Council may wish to adopt an aspirational approach to delivering self / custom build but this should not be pursued at the expense of delivering affordable housing for which a significant need has been identified in the Council's own evidence.

Under Policy H9 (Bullet Point (b)) on housing sites of 20 or more dwellings 10% of market dwellings will be offered for sale as bungalows. The Council should clarify that the requirement for 10% market housing to be provided as bungalows has been included as a component of the housing mix tested in the Council's viability assessment.

Bullet Points (a) and (b) of Policy H9 should be deleted.

(c) Is the wording of policy H9 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?

The 2019 NPPF (para 16) states that policies should be clearly written and unambiguous in this regard the wording of Policy H9 is not sufficiently clear or effective.

Q6. (a) Is policy H10 (*Part M of the Building Regulations*) justified, effective and consistent with national policy?

(b) In particular is the requirement of the policy for 10% of new homes on sites of 10 or more or a site area greater than 0.5 hectares to meet the optional technical standard of Category 2: accessible and adaptable homes justified and consistent with national policy?

Under Policy H10 on sites of 10 or more dwellings 10% of dwellings must meet higher optional Building Regulation of Part M Category 2 (M4(2)) accessible and adaptable homes. If the Council wishes to adopt the higher optional standards for accessible & adaptable compliant homes then this should only be done in accordance with national policy (2019 NPPF para 127f & Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Practice Guidance (NPPG)”*. The latest national policy states *“that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”* (2019 NPPF Footnote 46). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council should gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in the Local Plan in accordance with the NPPG. It is incumbent on the Council to provide a local assessment evidencing the specific case for Purbeck which justifies the inclusion of optional higher standards which should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as *“requiring something because it is essential or very important rather than just desirable”*.

The NPPG sets out the evidence necessary to justify a policy requirement for M4(2). The Council should apply the criteria set out in the NPPG (ID 56-005 to 56-011) to ensure that an appropriate evidence base is available to support requirements set out in Policy H10. This evidence includes identification of :-

- the likely future need ;
- the size, location, type and quality of dwellings needed ;
- the accessibility and adaptability of the existing stock ;
- variations in needs across different housing tenures ; and

- viability.

In determining the quantum of M4(2) homes the Council should focus on the ageing population living in the District compared to national / regional figures and the proportion of households living in newly built homes. If the Government had intended that evidence of an ageing population alone justified adoption of the higher M4(2) optional standards then such standards would have been incorporated as mandatory in the Building Regulations which is not the case. Many older people already live in the District and are unlikely to move home. Those that do move may not choose to live in a new dwelling.

All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. These standards are likely to be suitable for most residents.

The Council's supporting evidence provides insufficient detailed information on the accessibility and adaptability of the existing housing stock, the size, location, type and quality of dwellings needed and variations in needs across different housing tenures.

Policy H10 should be deleted.

(c) Is the policy capable of being deliverable in all cases except where there are viability considerations?

The policy may not be capable of being delivered because of physical site constraints such as steep slopes etc.

Q7. Are the requirements of policy H11 (*Affordable Housing*) justified by robust evidence, effective, likely to be viable and consistent with national policy including in respect of the threshold for the provision of affordable housing?

As set out in the 2019 NPPF the Local Plan should set out the level and type of affordable housing provision required together with other necessary infrastructure but such policies should not undermine the deliverability of the Local Plan (para 34). The cumulative burden of policy requirements should be set so that most development is deliverable without further viability assessment negotiations (2019 NPPF para 57). The Council's viability evidence is set out in its Viability Report 2018.

Policy H11 requires on sites of 10 or more dwellings affordable housing provision of 40% on greenfield sites and 30% on brownfield sites. In Designated Rural Areas on sites of 2 – 9 dwellings affordable housing provision of 20% is required on both greenfield and brownfield sites. In the Designated Rural Areas provision is for equivalent off-site financial

contributions. The policy should clarify that such financial contributions are only payable on completion. As evidenced in the Council's Viability Report there should also be a differentiation between contributions for greenfield and brownfield land on sites of 2 – 9 dwellings.

Word Count (excluding text in bold) : 3,093

**Purbeck Local Plan (2018 to 2034) Examination
Response to Inspector's Matters, Issues and Questions**

Matter E: Housing

Q6 – How has flexibility been provided in terms of the potential supply of housing land?

It is not considered that sufficient flexibility has been provided in the plan, as set out within our representations on the Submission document. As stated, there are however other opportunities, including land at Deans Drove, Lytchett Matravers, which does not contribute positively towards the purposes of the Green Belt and is suitable, available and deliverable. The sites inclusion would contribute towards ensuring that sufficient flexibility is incorporated into the plan to respond to changes and meet future housing requirements.

As set out within the SHLAA assessment and subsequent Memorandum of Understanding with the council, we (Wyatt Homes) have identified land for Suitable Alternative Natural Greenspace (SANG) in Lytchett Matravers which would include sufficient capacity to address the effect of additional dwellings on this site and associated requirements with regard to mitigating the adverse effects on European sites in accordance with policy H3 (New housing development requirements).

EXAMINATION OF THE PURBECK LOCAL PLAN (2018-2034)

EXAMINATION STATEMENT ON BEHALF OF CATEBSY ESTATES PLC

Matter E – Housing

Prepared by:

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May 2019

EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter E – Housing

03 June 2019

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- Appendix 3** 5-Year Housing Land Supply Calculation as at 01 April 2019
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EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter E – Housing

03 June 2019

1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of Catesby Estates Plc ("Catesby"), to those Questions raised by the Inspector (dated 10 May 2019), relating to Housing in respect of the Purbeck Local Plan (2018-2034) ("the Plan") and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton on behalf of Catesby Estates Plc.
- 1.3 Catesby has a promotion site on Land East of Foxhills Road, Lychett Matravers, which has an indicative capacity of upto 130 no. dwellings.

2.0 Matter E – Housing

Issue 2: Housing Land Supply (Policy H2)

(i) *Is the distribution of housing as set out in policy H2 (the housing land supply) consistent with the overall spatial strategy?*

- 2.1 In Catesby's view the general distribution of housing as set out in Policy H2 is broadly consistent with the spatial strategy that the Council has advanced in the Plan. That said the Council has failed to take the opportunities present to provide more than just the bare minimum level of housing to meet the minimum housing local housing requirement figure that it has identified. This is, in Catesby's view, a failure of the Plan, which has a direct bearing on the housing trajectory and in turn the soundness of the Plan as set out below.

(ii) *Is the housing land supply as set out in policy H2 likely to achieve delivery of the types of housing identified as being necessary in the SHMA [SD20 and SD21] and to be provided for through policy H9?*

2.2 Catesby's only observation on this matter is that the Council's over reliance upon windfall and small sites will inevitably mean that its capability to deliver much needed affordable housing will be significantly reduced either due to the size of sites coming forward or to potential issues of scheme viability. This represents a failing of the Plan.

(iii) *Are the Wareham and Bere Regis Neighbourhood Plans capable of making the allocations relied upon by policy V1 and H2 of the Local Plan?*

2.3 It is unclear from the evidence base as to how reliable these two Neighbourhood Plans will be in terms of delivering the allocations relied upon by the Plan. The Council has placed itself in a position of risk in terms of the delivery of some 330 dwellings, which given the fragility of its housing trajectory places the success of the Plan's housing delivery strategy at considerable risk. This matter is considered further in relation to question (viii) below and also Issue 3.

(iv) *Is there compelling evidence to indicate that 933 dwellings (35% of the housing land supply) will come forward from small sites next to existing settlements and windfall sites within existing settlements (except Wareham)?*

2.4 In short no – The Council has not presented the compelling evidence necessary to enable it to rely upon windfalls and small sites.

2.5 The Framework 2019 is clear that for a Council to include any allowance for windfalls within its housing trajectory it must set out compelling evidence that they will provide a reliable source of supply. Such evidence should be realistic having regard to the SHLAA, historic windfall rates and expected future trends¹.

2.6 By contrast the Council's evidence contained in SD19² refers only to historic trend data and a view is reached that 49 dpa is a 'reasoned allowance'. There is however no reasoning to justify the allowance save for an average calculation based on the years 2012 – 2018.

2.7 Given that Purbeck is an authority constrained by Green Belt and that the Plan is the first to make significant allocations in the Green Belt³ the majority of historic delivery will have come forward from sites within the defined urban areas as windfalls. This trend cannot be reliably projected into the future.

¹ Paragraph 70 on Page 19 of Framework 2019

² Paragraphs 100 – 103 on Pages 25-26 of SD19

³ The previous Local Plan Part 1 adopted in 2012 included a relatively modest level of greenfield development

2.8 The Council's case for inclusion of windfalls is based on nothing more than a best guess based on historic trends that cannot be reliable moving forward. This cannot be said to comprise the compelling evidence that the Framework now requires particularly in the context of the current 5-year period.

2.9 In Catesby's view the windfall allowance should, at the very least, be removed from the current 5 year period 2019 – 2024 and the Council should be required to provide the compelling evidence that is necessary for it to continue to rely on windfalls for the remainder of the Plan period. If the Council is unable to do this the windfall allowance should be removed altogether.

(v) *The housing background paper [SD19] indicates that the approach taken in the Plan not to allocate small sites but rather to include a small sites policy (policy H8) is intended to allow greater flexibility and deliverability of suitable housing. Is this justified and is such an approach consistent with national policy as set out in paragraph 68 of the Framework?*

2.10 Whilst Catesby is encouraged by the inclusion of Policy H8 this does not, in Catesby's view, go far enough to meet with the requirements of Paragraph 68 a) of the Framework 2019. The Framework is clear that LPAs should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Policy H8 does not do this.

2.11 Given that the Council places such reliance on windfalls (35% of the total supply) it is considered even more important that specific sites are identified to meet with the requirements of Paragraph 68. This would in turn reduce the dependency on the unreliable source of windfalls in the trajectory and ensure that early delivery of small sites is achieved in a planned and coordinated fashion.

2.12 The Council's core evidence base, particularly its SHLAA, confirms that such sites are available and therefore they can and should be allocated.

(vi) *How has flexibility been provided in terms of the potential supply of housing land?*

2.13 In short the Council has provided no flexibility in terms of its potential supply of housing land. The minimum requirement set out in Policy H1 of 2,688 dwellings for the period 2018 – 2034 is met exactly in Policy H2. What this means in practice is that the Council requires 100% delivery from all identified sources of supply at the time it predicts they will deliver in order for the Plan to succeed. This level of success is unheard of in a Local Plan situation and is almost certain to lead to failure. The Plan is totally inflexible and

cannot respond to any change in circumstances. It cannot therefore be said that the housing delivery strategy is positively prepared.

(vii) In order to identify all components that make up the housing land supply should the Plan identify completions since the start of the Plan period and commitments (dwellings with planning permission, or with a resolution to grant permission subject to a planning obligation)?

- 2.14 In short yes. The Council has not included any data on completions or commitments within the trajectory set out on Page 51 of the Plan nor within Figure 3 and Table 4 of SD19. This is unusual.
- 2.15 Neame Sutton has requested the data from the Council that underpins Figure 3 (as repeated on Page 51 of the Plan). This was provided by email dated 28 May 2019 and confirms no inclusion of completions or commitments in the housing trajectory.
- 2.16 The Council's latest assessment of 5-year housing land supply [SD38a] does however include both completions for the year 2018-2019 and Commitments as at 01 April 2019, so the data is readily available for inclusion within the trajectory.
- 2.17 In Catesby's view it is vitally important to the Inspector's understanding of the robustness of the housing trajectory for completion and commitment data to be included. As set out in relation to question (viii) and Issue 3 below Neame Sutton has included completion data within its assessment of the Council's trajectory so that the Inspector can see the affect on the delivery strategy and the rolling 5-year supply position in particular.
- 2.18 Of particular note is the fact that SD38a confirms completions of 73 no. dwellings in the year 2018-2019 against a Plan requirement of 168 no. dwellings leading to a shortfall of some 95 no. dwellings.
- 2.19 It is understood that the Council intends to update its housing trajectory in answer to question (viii) below and Catesby therefore reserves the right to update its own analysis to reflect the Council's changed position once it has been made publicly available.

- (viii) *Does the housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period?*

The change (MM4) indicated in the schedule of possible modifications [SD14] indicates the intention to update the housing trajectory graph to reflect the latest available information on delivery and phasing for allocated sites. What would be the effect of this? Is this necessary to ensure the Plan is sound?

2.20 In Catesby's view the housing trajectory that the Council is relying upon is flawed for the following reasons:

- 2.20.1 **Reason 1** - The Council has not demonstrated that the trajectory will maintain a rolling 5-year supply in accordance with the requirements of Paragraph 73 of the Framework 2019.
- 2.20.2 **Reason 2** – The trajectory does not reflect the latest completion data for the period 2018 – 2019.
- 2.20.3 **Reason 3** - The trajectory is heavily dependent (35% of the total supply) on as yet unidentified windfalls and small sites for which no compelling evidence has been presented to justify any allowance let alone over a third of the total supply.
- 2.20.4 **Reason 4** – No flexibility allowance is included in the trajectory such that 100% delivery is required from all sources of supply to meet the minimum housing requirement set out in Policy H1.
- 2.20.5 **Reason 5** – Because neither the Plan nor SD19 explain the detail behind the trajectory graph the Council has failed to present any evidence to support the delivery rates that it anticipates from each of the proposed housing allocation sites in the Plan. This fails the clear evidence test required by Annex 2 of the Framework 2019.
- 2.20.6 **Reason 6** – Even with 100% delivery from all identified sources of supply and applying a 10% buffer (see answer to Issue 3 below and appendices attached) the Council's actual rolling 5-year supply position bounces along the bottom of the range i.e. the Council only just maintains a supply.

2.21 In conclusion the Council's housing trajectory only succeeds by the skin of its teeth and assuming that the approach taken by the Council in relation to windfalls, small sites and its allocations is correct, which for the reasons set out above Catesby contends it is not correct.

2.22 The answer to this situation is a simple one. The Council needs to allocate more sites in the early years of the Plan period to increase supply and build in the necessary flexibility to ensure the Plan can respond to changes in circumstances during its life.

Issue 3: 5-Year Housing Land Supply

- (i) *Is it robustly demonstrated that at adoption the Plan will deliver a 5-year housing land supply at adoption and that this can be maintained throughout the Plan period, calculated in accordance with national policy and guidance, taking account of past delivery performance and applying the appropriate 10% or 20% buffer?*
- (ii) *What is the current position with regard to housing supply?*
- (iii) *Is there a 5-year supply?*
- (iv) *How has this been calculated?*

2.23 The short answer to questions (i) – (iii) above is no. The Plan fails to demonstrate a 5-year supply now or at any point during the Plan period.

2.24 The reasons for this view are set out below.

2.25 Firstly having reviewed the method the Council has applied to the calculation of its 5-year supply and in particular the approach to dealing with the shortfall and the buffer, Catesby is in agreement with approach the Council has taken, namely the use of the Sedgefield method⁴ for the shortfall and the application of a 10% buffer⁵.

2.26 The Council has however failed in the evidence it presents in SD38a to provide the clear evidence that is required by Annex 2 of the Framework 2019 in respect of the following supply sources:

- Windfalls and Small Sites – For the reasons explained above the Council has not presenting any clear or compelling evidence for the inclusion of supply from this source; and,
- Allocations – The only evidence the Council offers in SD38a comprises a series of assumptions made in respect of Bere Regis and Swanage and 3 emails (1 each) in respect of the proposed housing allocations at Wool, Lychett Matravers and Upton, and Moreton. No evidence is provided in terms of

⁴ Paragraph: 044 Reference ID: 3-044-20180913 Revision date: 13 09 2018

⁵ The HDT result published by Government for Purbeck confirms that a 20% Buffer is not required: <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

progress to secure developers (where they are not currently present), the programme for technical work that will lead into a planning application submission, the timetable for an application submission, its determination, completion of legal agreements, submission of subsequent reserved matters, discharge of planning conditions and the works necessary in the lead upto first completions being achieved. The Council does not rely on any credible empirical data such as can be found in the NLP publication From Start to Finish (copy attached at Appendix 1).

- 2.27 The Council claims that SD38a comprises a robust assessment of its 5-year housing land supply position, yet it was published within a month of the start of the monitoring period and relies only on 3 emails from outside sources to support its position. This cannot be regarded as robust evidence. As an illustration of the lengths that a Council should go to in order to present robust evidence in an Annual Position Statement the latest assessment by Mid Suffolk District Council is attached at Appendix 2. Whilst Catesby does not contend that this Annual Position Statement meet the requirements of Paragraph 74⁶ it does demonstrate that considerably more evidence is required than the Council here is seeking to rely upon.
- 2.28 The consequence of this is that the vast majority of the Council's proposed supply for the current 5-year period must be removed because it fails to meet the Annex 2 deliverability test, which is a minimum requirement of Paragraphs 73 and 74 of the Framework 2019.
- 2.29 An illustration of the removal of those supply sources that fail the test is set out in Appendix 3, which shows that the Council's supply falls from 6.8 years to 2.7 years with a 10% buffer.
- 2.30 When turning to consider how this affects the Council's ability to demonstrate a rolling 5-year supply over the Plan period it is not possible from any evidence provided by the Council to see a rolling 5-year supply. Neame Sutton has therefore prepared a spreadsheet attached at Table 1 in Appendix 4, which applies the data provided by the Council in its email of 28 May 2019 (copy attached at Appendix 5) to demonstrate the rolling 5-year supply position.
- 2.31 The Inspector will note that even when the Council's data is applied without change the best the Council achieves is 6.2 years in 2022-2023.

⁶ This Annual Position Statement has not yet been assessed by PINS.

2.32 However when the following adjustments are made to the supply the position changes considerably (Table 2 in Appendix 6):

- Inclusion of completions for 2018-2019 and consequent removal of Council's estimates for that monitoring year; and,
- Removal of windfalls and small sites from the current 5-year period 2019 – 2024.

2.33 The housing supply position never reaches a positive throughout the whole Plan period.

2.34 When the approach set out in Paragraph 2.26 above is applied to the allocations for the next 5-year period 2019-2024 the supply position worsens considerably. Table 3 in Appendix 7 illustrates this⁷.

2.35 It is clear therefore that the Council cannot demonstrate a 5-year supply of deliverable land in accordance with Paragraphs 73 and 74 of the Framework 2019 now and when only modest and reasonable adjustments are made to the trajectory it fails to deliver a rolling 5-year supply at any point during the Plan period.

2.36 The consequence is that the Plan is unsound and that further housing land is required to be allocated particularly to deal with the early years delivery.

⁷ Note that the trajectory for those allocations the Council rely upon has been adjusted so that the total supply envisaged from each location is still achieved within the Plan period.

3.0 Changes Sought

3.1 The following changes are required for the Plan to be found sound:

- Removal of windfalls from the first 5-years of the supply (and potentially the whole supply if compelling evidence cannot be demonstrated);
 - Inclusion of completion data for 2018-2019;
 - Allocation of additional housing sites (small scale and large scale) to meet early years delivery deficit and provide flexibility in overall housing delivery strategy. In this respect Catesby's promotion site on land east of Foxhills Road, Lychett Matravers is an ideal location for accommodating upto 130 no. dwellings;
 - Provision, by the Council, of clear evidence to meet the Annex 2 test if current supply sources are to be relied upon for the first 5-years of the Plan period; and,
 - Consequent update to housing trajectory with a transparent table appended to the Plan setting out the detailed delivery rates that underpin the Figure on Page 55 and Figure 3 of SD19.
-

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Start to Finish

How Quickly do Large-Scale Housing Sites Deliver?

November 2016

Executive Summary

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, what looks good on paper needs to deliver in practice. Plans putting forward large sites to meet need must have a justification for the assumptions they make about how quickly sites can start providing new homes, and be reasonable about the rate of development. That way, a local authority can decide how far it needs to complement its large-scale release with other sites – large or small – elsewhere in its district.

This research looks at the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales (outside London). We draw five conclusions:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. There is no evidence to support the notion of systemic 'land banking' outside London: the commercial drivers of both house builders and land promoters incentivises rapid build out of permissions to secure returns on capital.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery.
5. For large-scale sites, it matters whether a site is brownfield or greenfield. The latter come forward more quickly.

In our conclusions we identify a check list of questions for consideration in exploring the justification for assumed timing and rates of delivery of large-scale sites.

The Research in Figures

70 number of large sites assessed

3.9 years the average lead in time for large sites prior to the submission of the first planning application

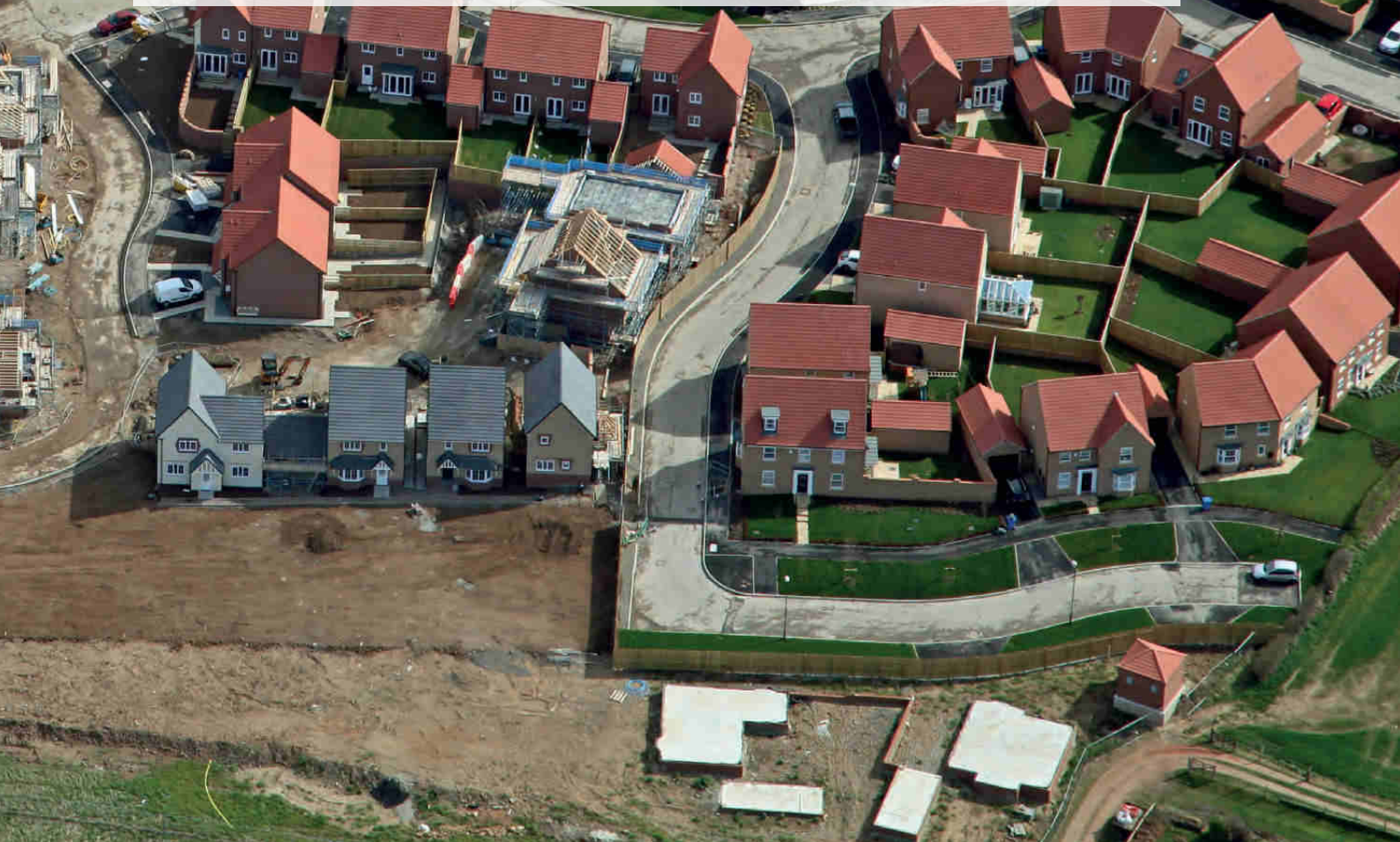
6.1 years the average planning approval period of schemes of 2,000+ dwellings. The average for all large sites is circa 5 years

161 the average annual build rate for a scheme of 2,000+ dwellings

321 the highest average annual build rate of the schemes assessed, but the site has only delivered for three years

40% approximate increase in the annual build rate for large sites delivering 30%+ affordable housing compared to those delivering 10%-19%

50% more homes per annum are delivered on average on large greenfield sites than large brownfield sites





Introduction

When it comes to housing, Government wants planning to think big. With its Garden Towns and Villages agenda and consultation on proposed changes to the National Planning Policy Framework (NPPF) to encourage new settlements, planning authorities and developers are being encouraged to bring forward large-scale housing development projects, many of them freestanding. And there is no doubt that such projects will be necessary if England is to boost supply and then consistently deliver the 300,000 new homes required each year¹.

Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period. Their scale means delivery of the infrastructure and local employment opportunities needed to sustain mixed communities.

But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result.

So, if Local Plans and five year land supply assessments are to place greater reliance on large-scale developments – including Garden Towns and Villages – to meet housing needs, the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.

“Local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area.”

DCLG consultation on proposed changes to national planning policy (December 2015)

The Planning Practice Guidance (PPG) offers little guidance other than identifying that timescales and rates of development in land availability assessments should be based on information that “*may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year*”². It also requires housing land availability assessments to include: “a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome.”³

This research provides insights to this topic – which has become a perennial discussion at Local Plan examinations and Section 78 appeals in recent years – by focusing on two key questions:

1. what are realistic lead-in times for large-scale housing developments?; and
2. once the scheme starts delivering, what is a realistic annual build rate?

NLP has carried out a desk-based investigation of the lead-in times and build-out rates on 70 different strategic housing sites (“large sites”) delivering 500 or more homes to understand what factors might influence delivery. For contrast 83 “small sites” delivering between 50 and 499 homes have been researched to provide further analysis of trends in lead in times and build rates at varying scales.

As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects.

¹ House of Lords Select Committee on Economic Affairs (2016) Building more homes: 1st Report of Session 2016-17 - HL Paper 20

² PPG ID: 3-023-20140306

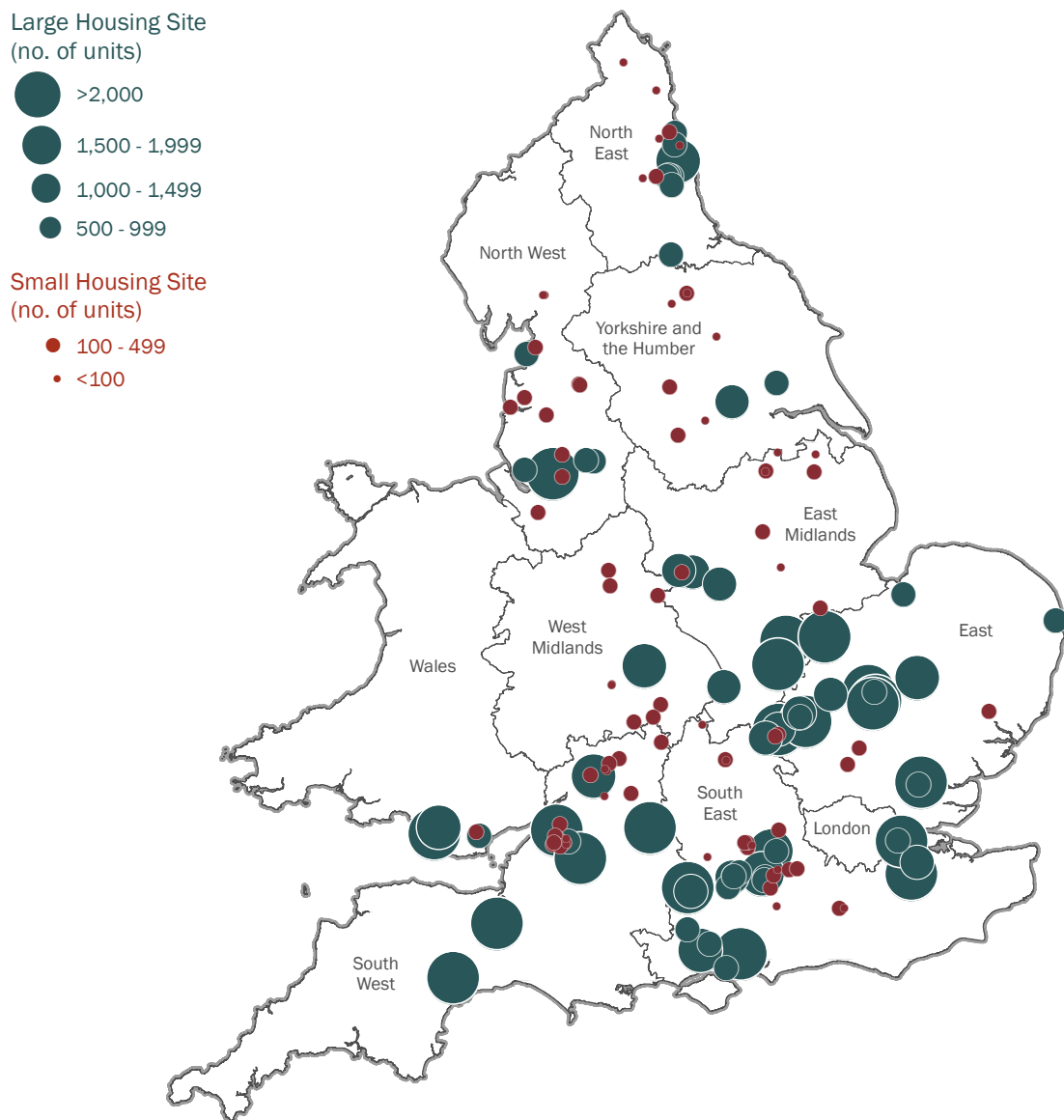
³ PPG ID: 3-028-20140306

Data Sources and Methodology

In total NLP reviewed 70 strategic sites (“large sites”) which have delivered, or will deliver, in excess of 500 dwellings. The sites range in size from 504 to 15,000 dwellings. The geographic distribution of the 70 large sites and comparator small sites is set out below in Figure 1. A full list of the large sites can be found in Appendix 1 and the small sites in Appendix 2. NLP focused on sites outside London, due to the distinctive market and delivery factors applicable in the capital.

Efforts were made to secure a range of locations and site sizes in the sample, but it may not be representative of the housing market in England and Wales as a whole and thus conclusions may not be applicable in all areas or on all sites.

Figure 1: Geographic Distribution of the 70 Large Sites and 83 Small Sites Assessed



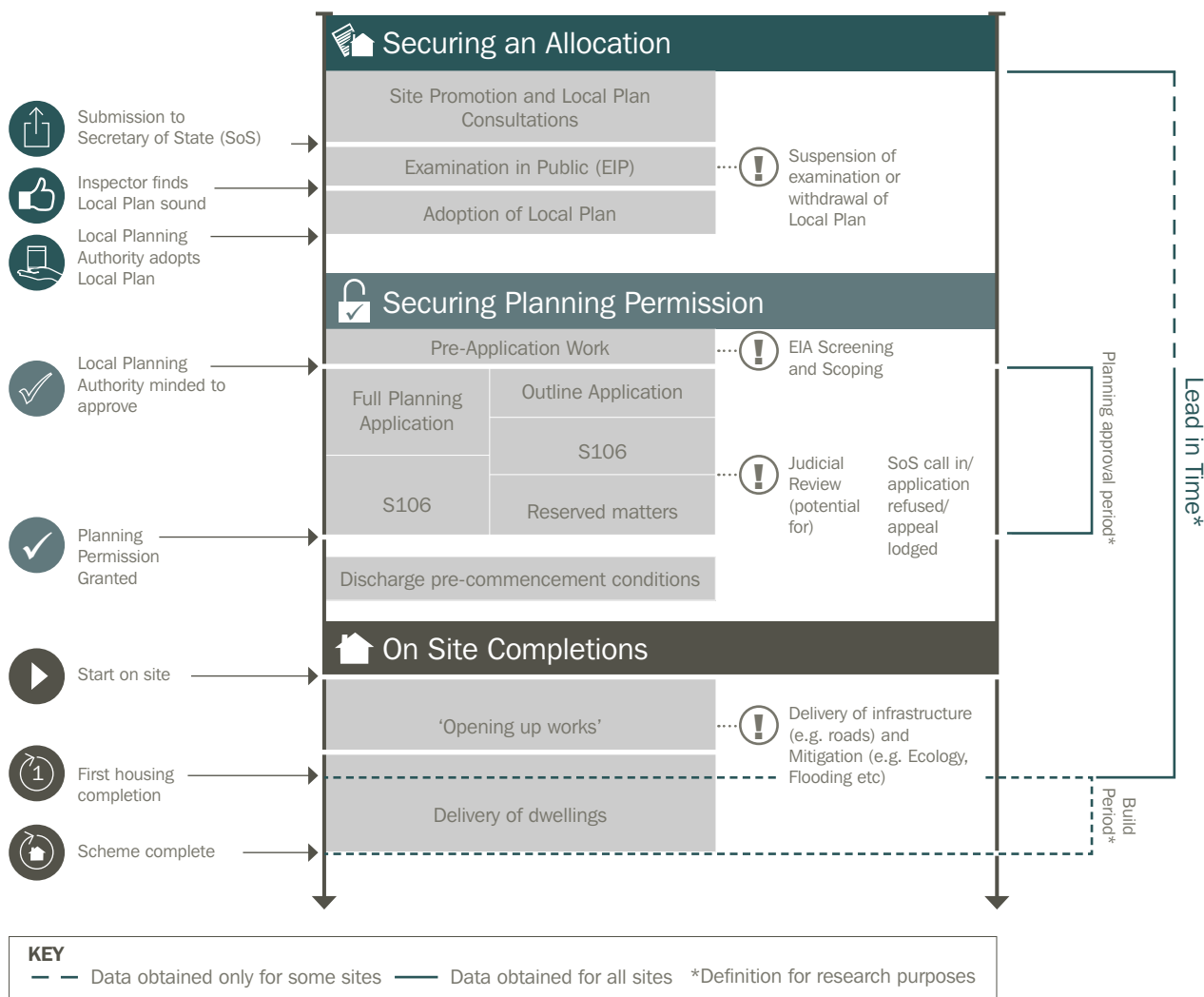
Source: NLP analysis

Methodology

The research aims to cover the full extent of the planning and delivery period. So, wherever the information was available, the data collected on each of the 70 sites covers the stages associated with the total lead-in time of the development (including the process of securing a development plan allocation), the total planning approval period, starting works on site, delivery of the first dwelling and the annualised build rates recorded for the development up until to the latest year where data is available (2014/15). To structure the research and provide a basis for standardised measurement and comparison, these various stages (some of them overlapping) have been codified.

Figure 2 sets out the stages and the milestones used to measure them. These are assumed to fall under what are defined as 'lead-in times', 'planning approval periods' and 'build periods', with 'first housing completion' denoting the end of the lead-in time and start of the build period. Not every site assessed will necessarily have gone through each component of the identified stages sequentially, or indeed at all (for example, some sites secure planning permission without first being allocated).

Figure 2: Timeline for the Delivery of a Strategic Housing Site



Source: NLP

Start to Finish

The approach to defining these stages for the purposes of this research is set out below:

- The **'lead-in time'** – this measures the period up to the first housing completion on site from either a) the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document) or where not applicable, available or readily discernible – b) the validation date of the first planning application made for the scheme.
- The **'planning approval period'** is measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). The discharge of any pre-commencement and other conditions obviously follows this, but from a research perspective, a measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.
- The date of the **'first housing completion'** on site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.
- The **'annual build rate'** falls within the overall 'build period'. The annual build rate of each site is taken or inferred from the relevant Local Planning Authority's Annual Monitoring Reports (AMR) or other evidence based documents where available. In some instances this was confirmed – or additional data provided – by the Local Planning Authority or County Council.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the vintage of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for all sites. And because not all of the sites assessed have commenced housing delivery, annual build rate information is not universal. The results are presented accordingly.



Getting Started:

What are Realistic Lead-in Times?

How long does it take for large-scale sites to get up and running? This can be hard to estimate. Understandably, those promoting sites are positive about how quickly they can deliver, and local authorities choosing to allocate large-scale sites in their plans are similarly keen for these sites to begin making a contribution to housing supply. This leads some local housing trajectories to assume that sites can be allocated in Local Plans and all detailed planning approvals secured in double-quick time. However, the reality can prove different.

Our main focus here is on the average 'planning approval period' and the subsequent period from receiving a detailed planning approval to delivery of the first house on site. However, another important metric is how long it takes from the site being first identified by the local authority for housing delivery to getting started on site. Unfortunately, getting accurate data for this on some of the historic sites is difficult, so this analysis is focused on a just 18 of the sample sites where information was available.

Lead-in Times

The lead-in time prior to the submission of a planning application is an important factor, because many planning issues are flushed out in advance of planning applications being submitted, not least in terms of local plan allocations establishing the principle of an allocation. In a plan-led system, many large-scale sites will rely on the certainty provided by Local plans, and in this regard, the slow pace of plan-making in the period since the NPPF⁴ is a cause for concern.

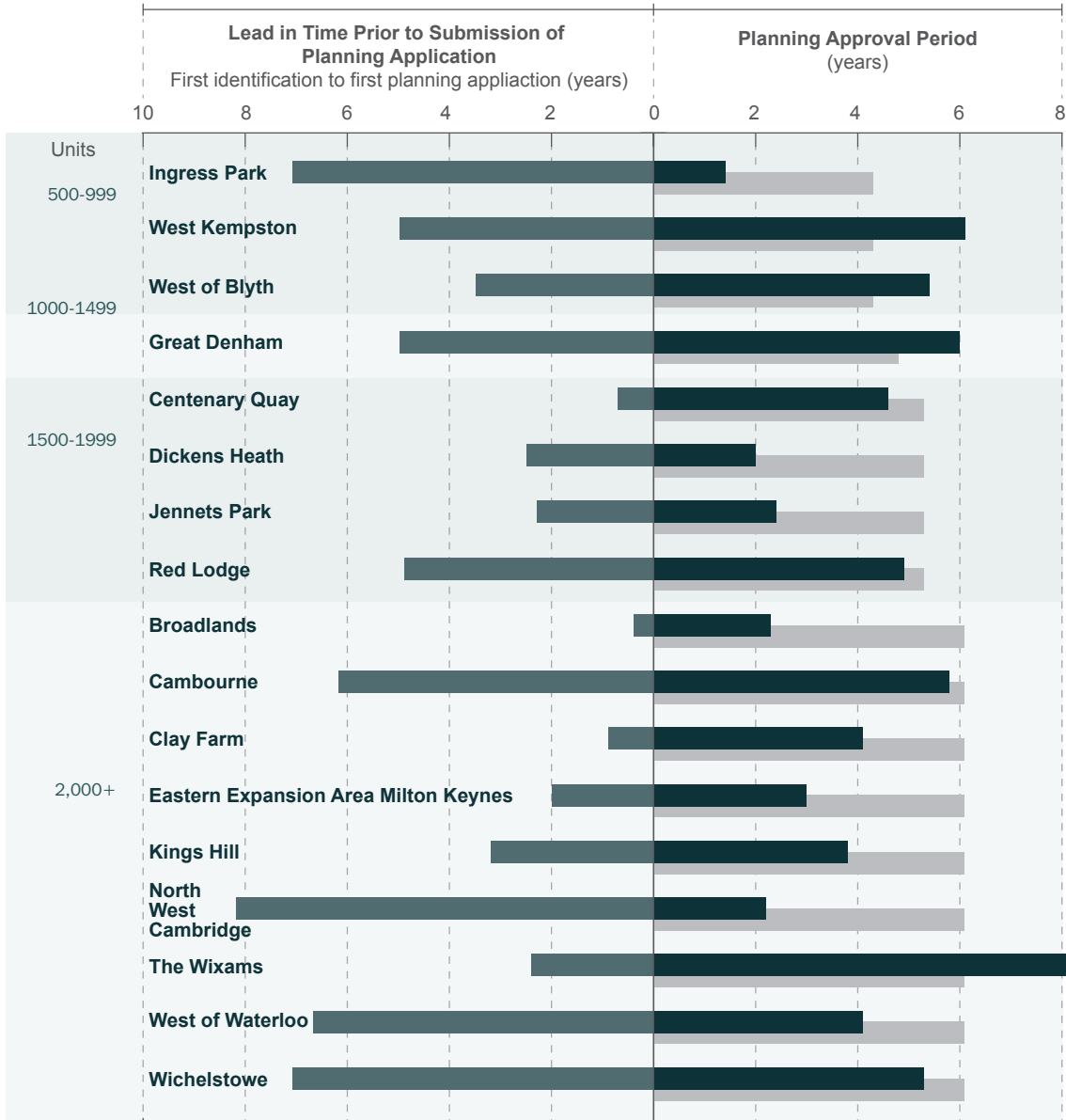
If the lead-in time prior to submission of an application is able to focus on addressing key planning issues, it can theoretically help ensure that an application – once submitted – is determined more quickly. Our sample of sites that has lead-in time information available is too small to make conclusions on this theory. However, there is significant variation within these sites highlighting the complexity of delivering homes on sites of different sizes. Of this sample of sites: on average it was 3.9 years from first identification of the site for housing to the submission of the initial planning application.

Moreover, a substantial lead-in time does not guarantee a prompt permission: 4 of the 18 sites that took longer to gain planning permission than the average for sites of comparable size and also had lead-in times prior to submission of a planning application of several years⁵.

⁴ As at September 2016, just 34% of Local Authorities outside London have an up-to-date post-NPPF strategic-level Local Plan. Source: PINS / NLP analysis.

⁵ The sites in question were The Wixams, West Kempton, West of Blyth, and Great Denham.

Figure 3: Average lead-in time of sites prior to submission of the first planning application



KEY
 ■ Lead in time prior to submission of planning application
 ■ Planning approval period
 ■ Average planning application period for site of that size

Source: NLP analysis

The Planning Approval Period: Size Matters

The term ‘planning approval period’ in this report measures the period from the validation date of the first planning application for the scheme to the decision date of the first application which permits development of dwellings on site (this could be a full, hybrid or reserved matters application). Clearly, in many cases, this approval will also need to be followed by discharge of pre-commencement conditions (a focus of the Government’s Neighbourhood Planning Bill) but these were not reviewed in this research as a detailed approval was considered an appropriate milestone in this context.

The analysis considers the length of planning approval period for different sizes of site, including comparing large-scale sites with small sites. Figure 4 shows that the greater the number of homes on a site, the longer the planning approval period becomes. There is a big step-up in time for sites of in-excess of 500 units.

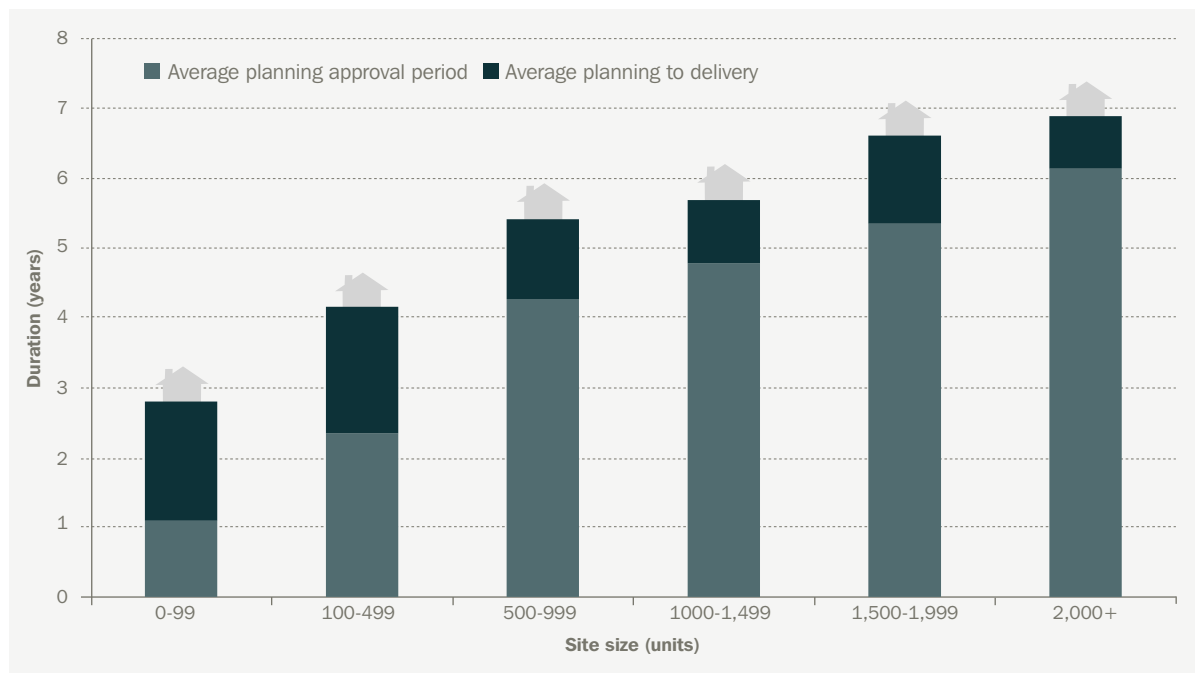
Time Taken for First Housing Completion after Planning Approval

Figure 4 also shows the time between the approval of the first application to permit development of dwellings on site and the delivery of the first dwelling (during which time any pre-commencement conditions would also be discharged), in this analysis this is the latter part of the lead in time period. This reveals that the timescale to open up a site following the detailed approval is relatively similar for large sites.

Interestingly, our analysis points to smaller sites taking longer to deliver the first home after planning approval. This period of development takes just over 18 months for small sites of under 500 units, but is significantly quicker on the assessed large-scale sites; in particular, on the largest 2,000+ dwelling sites the period from receiving planning approval to first housing completion was 0.8 years.

In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.

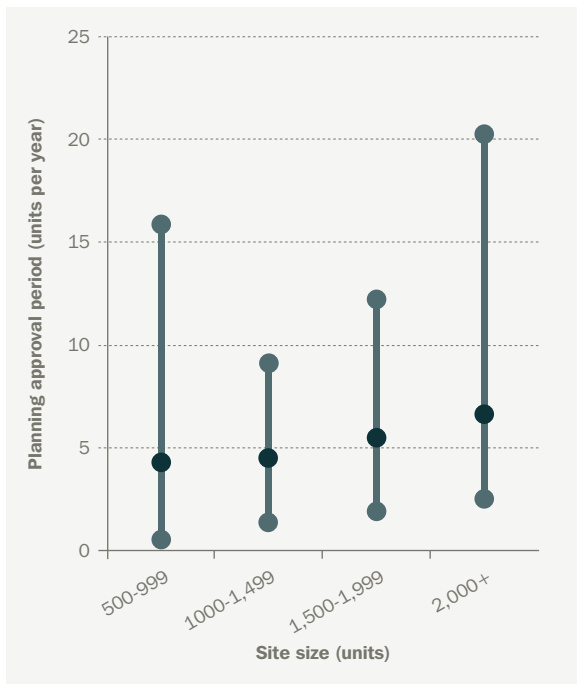
Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



Source: NLP analysis

Of course, these are average figures, and there are significant variations from the mean. Figure 5 below shows the minimum and maximum planning approval periods for sites in each of the large size categories. This shows even some of the largest sites coming forward in under two years, but also some examples taking upwards of 15-20 years. Clearly, circumstances will vary markedly from site to site.

Figure 5: Site size and duration of planning



Source: NLP analysis

Case Studies

If some sites are coming forward more quickly than the average for sites of that size, what is it that is driving their rapid progress? We explored this with some case studies. These suggest that when schemes are granted planning permission significantly faster than the above averages, it is typically due to specific factors in the lead-in time prior to the submission of a planning application.

Gateshead – St James Village (518 dwellings): Planning approval period 0.3 years⁶

This site was allocated as a brownfield site in the Gateshead UDP (2000) prior to the submission of a planning application for the regeneration scheme. A Regeneration Strategy for East Gateshead covered this site and as at 1999 had already delivered high profile flagship schemes on the water front. Llewelyn Davis were commissioned by the Council and English Partnerships to prepare a masterplan and implementation strategy for the site which was published in June 1999. Persimmon Homes then acquired the site and it was agreed in autumn 1999 that they should continue the preparation of the masterplan. East Gateshead Partnership considered the masterplan on the 08th March 2000 and recommended approval. Subsequently, the outline application (587/00) with full details for phase 1 was validated on the 6th September 2000 and a decision issued on the 9th January 2001.

It is clear that although it only took 0.3 years for the planning application to be submitted and granted for a scheme of more than 500 units, the lead in time to the submission of the application was significant, including an UDP allocation and a published masterplan 18 months ahead of permission being granted. By the time the planning application was submitted most of the site specific issues had been resolved.

⁶ St James Village is excluded from the lead-in time analysis because it is unclear on what date the site was first identified within the regeneration area

Dartford – Ingress Park (950 dwellings):

Planning approval period 1.4 years

This site was initially identified in a draft Local Plan in 1991 and finally allocated when this was adopted in April 1995. The Ingress Park and Empire Mill Planning Brief was completed in three years later (November 1998).

The submission of the first planning application for this scheme predated the completion of the Planning Brief by a few months, but the Council had already established that they supported the site. By the time the first application for this scheme was submitted, the site had been identified for development for circa seven years.

The outline application (98/00664/OUT) was validated on the 10th August 1998 and permission granted on the 21st Nov 2000, a determination period of 1 year and 3 months). A full application for the First Phase for 52 dwellings (99/00756/FUL) was validated and approved in just two months, prior to approval of the outline. Clearly, large-scale outline permissions have to wrap up a wide range of other issues, but having first phase full applications running in parallel can enable swifter delivery, in situations where a 'bite sized' first phase can be implemented without triggering complex issues associated with the wider site.

Cambridge and South Cambridgeshire – North West Cambridge (3,000 dwellings and 2,000 student bed spaces):

Planning approval period 2.2 years

Cambridge University identified this area as its only option to address its long-term development needs, and the Cambridgeshire and Peterborough Structure Plan 2003 identified the location for release from the Green Belt. The site was allocated in the 2006 Cambridge Local Plan, and the North West Cambridge Area Action Plan was adopted in October 2009. The Area Action Plan established an overall vision and set out policies and proposals to guide the development as a whole.

As such, by the time the first application for this scheme was submitted, there had already been circa eight years of 'pre-application' planning initially concerning the site's release from the Green Belt, but then producing the Area Action Plan which set out very specific requirements.. This 'front-loaded' consideration of issues that might otherwise have been left to a planning application.

The outline application (11/1114/OUT – Cambridge City Council reference) for delivery of up to 3,000 dwellings, up to 2,000 student bed spaces and 100,000 sqm of employment floorspace was validated on the 21st September 2011 and approved on the 22nd of February 2013. The first reserved matters application for housing (13/1400/REM) was validated on the 20th September 2013 and approved on the 19th December 2013. Some ten years from the concept being established in the Structure Plan.

Summary on Lead-in Times

1. On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.
2. Consideration of whether and how to implement development schemes is necessary for any scheme, and the evidence suggests that where planning applications are determined more quickly than average, this is because such matters were substantially addressed prior to the application being submitted, through plan-making, development briefs and/or master planning. There is rarely a way to short-circuit planning.
3. Commencement on large sites can be accelerated if it is possible to 'carve-out' a coherent first phase and fast track its implementation through a focused first phase planning application, in parallel with consideration of the wider scheme through a Local Plan or wider outline application.
4. After receiving permission, on average smaller sites take longer to deliver their first dwelling than do the largest sites (1.7-1.8 years compared to 0.8 years for sites on 2,000+ units).

Lapse Rates: What Happens to Permissions?

Not every planning permission granted will translate into the development of homes. This could mean an entire site does not come forward, or delivery on a site can be slower than originally envisaged. It is thus not realistic to assume 100% of planning permission granted in any given location will deliver homes. Planning permissions can lapse for a number of reasons:

1. The landowner cannot get the price for the site that they want;
2. A developer cannot secure finance or meet the terms of an option;
3. The development approved is not considered to be financially worthwhile;
4. Pre-commencement conditions take longer than anticipated to discharge;
5. There are supply chain constraints hindering a start; or
6. An alternative permission is sought for the scheme after approval, perhaps when a housebuilder seeks to implement a scheme where the first permission was secured by a land promoter.

These factors reflect that land promotion and housebuilding is not without its risks.

At the national level, the Department for Communities and Local Government has identified a 30-40% gap between planning permissions granted for housing and housing starts on site⁷. DCLG analysis suggested that 10-20% of permissions do not materialise into a start on site at all and in addition, an estimated 15-20% of permissions are re-engineered through a fresh application, which would have the effect of pushing back delivery and/or changing the number of dwellings delivered.

This issue often gives rise to claims of 'land banking' but the evidence for this is circumstantial at best, particularly outside London. The business models of house builders are generally driven by Return on Capital Employed (ROCE) which incentivises a quick return on capital after a site is acquired. This means building and selling homes as quickly as possible, at sales values consistent with the price paid for the land. Land promoters (who often partner with landowners using promotion agreements) are similarly incentivised to dispose of their site to a house builder to unlock their promotion fee. Outside London, the scale of residential land prices has not been showing any significant growth in recent years⁸ and indeed for UK greenfield and urban land, is still below levels last seen at least 2003⁹. There is thus little to incentivise hoarding land with permission.

The LGA has identified circa 400-500,000 units of 'unimplemented' permissions¹⁰, but even if this figure was accurate, this is equivalent to just two years of pipeline supply. More significantly, the data has been interpreted by LGA to significantly overstate the number of unimplemented permissions because 'unimplemented' refers to units on sites where either the entire site has not been fully developed or the planning permission has lapsed¹¹. It therefore represents a stock-flow analysis in which the outflow (homes built) has been ignored.

Insofar as 'landbanking' may exist, the issue appears principally to be a London – rather than a national – malaise, perhaps reflecting that land values in the capital – particularly in 'prime' markets – have increased by a third since the previous peak of 2007. The London Mayor's 'Barriers to Housing Delivery – Update' of July 2014 looked at sites of 20 dwellings or more and reported that only about half of the total number of dwellings granted planning permission every year are built (Table 3); a lapse rate of circa 50% across London.

Clearly, the perceived problem of landbanking is seeing policy attention from Government, but caution is needed that any changes do not result in unintended consequences or act as a disincentive to secure planning permissions.

A more practical issue is that Plans and housing land trajectories must adopt sensible assumptions, based on national benchmarks, or – where the data exists – local circumstances, to understand the scale of natural non-implementation.

⁷ DCLG Presentations to the HBF Planning Conference (September 2015)

⁸ Knight Frank Residential Development Land Index Q1 2016 <http://content.knightfrank.com/research/161/documents/en/q1-2016-3844.pdf>

⁹ Savills Development Land Index <http://www.savills.co.uk/research/uk/residential-research/land-indices/development-land-index.aspx>

¹⁰ Glenigan data as referenced by Local Government Association in its January 2016 media release (a full report is not published) http://www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7632945/NEWS

¹¹ This would mean that a site which has built 99% of homes will still show up as 100% of units being 'unimplemented'

Build Rates: How Fast Can Sites Deliver?

The rate at which sites deliver new homes is a frequently contested matter at Local Plan examinations and during planning inquiries considering five year housing land supply. Assumptions can vary quite markedly and expectations have changed over time: in 2007, Northstowe – the new settlement to the north west of Cambridge – was expected by the Council to deliver 750-850 dwellings per annum¹²; it is now projected to deliver at an annual rate of just 250¹³.

There is a growing recognition that the rate of annual delivery on a site is shaped by ‘absorption rates’: a judgement on how quickly the local market can absorb the new properties. However, there are a number of factors driving this for any given site:

- the strength of the local housing market;
- the number of sales outlets expected to operate on the site (ie the number of different house builders or brands/products being delivered); or
- the tenure of housing being built. Are market homes for sale being supplemented by homes for rent, including affordable housing?

The analysis in this section explores these factors with reference to the surveyed sites.

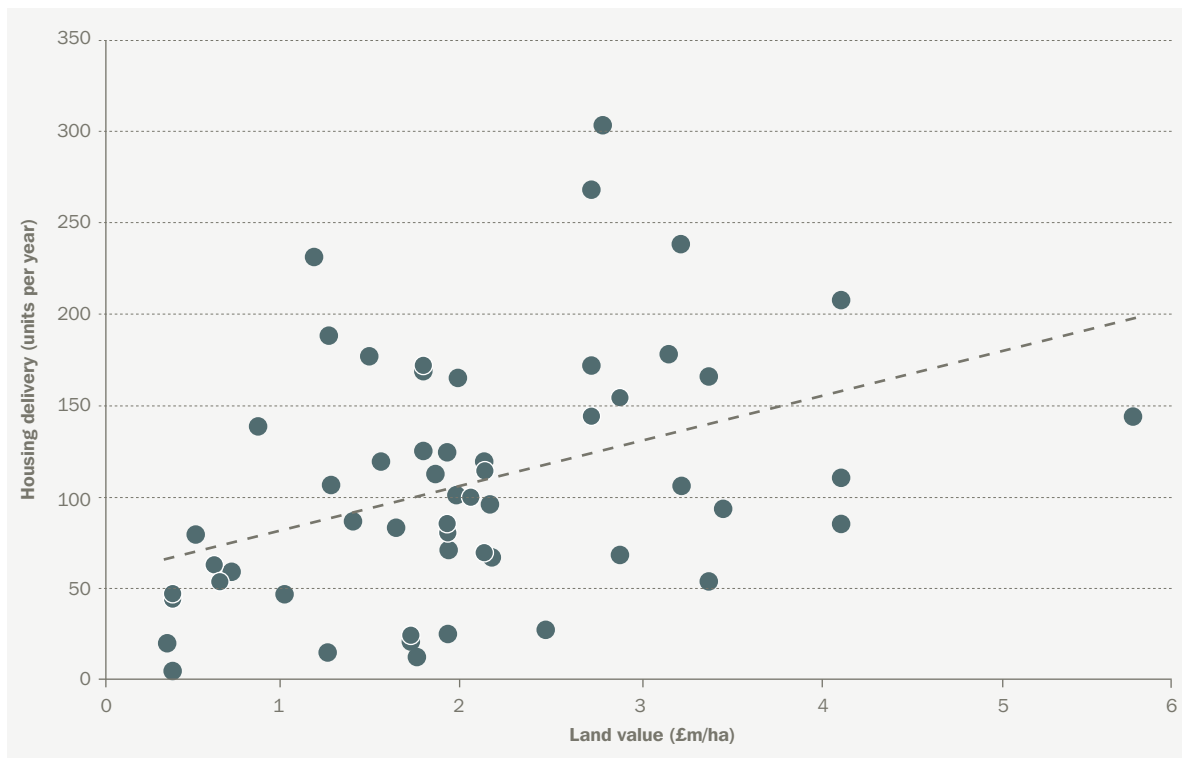
Market Strength

It might seem a truism that stronger market demand for housing will support higher sales and build rates – but how far is that the case and how to measure it?

Figure 6 below compares CLG data on post-permission residential land value estimates (£/ha) by Local Authorities in 2014¹⁴ to the average build out rate of each of the assessed strategic sites. Unfortunately the residential land value estimates are only available for England and as such the Welsh sites assessed are excluded, leaving 57 sites in total.

The analysis shows that markets matter. Relatively weaker areas may not be able to sustain the high build-out rates that can be delivered in stronger markets with greater demand for housing. There are significant variations, reflecting localised conditions, but the analysis shows a clear relationship between the strength of the market in a Local Authority area and the average annual build rates achieved on those sites. Plan makers should therefore recognise that stronger local markets can influence how quickly sites will deliver.

Figure 6: Average Annual Build-out Rates of sites compared to Land Values as at 2014



Source: NLP analysis and CLG Post-permission residential land value estimates (£/ha) by Local Authorities (February 2015)

¹² South Cambridgeshire Annual Monitoring Report 2006/07

¹³ South Cambridgeshire Annual Monitoring Report 2014/15

¹⁴ Post-permission residential land value estimates were released in December 2015, however the end date of the build rate data obtained is 2014/15; as such land value estimates at February 2015 are better aligned to the build periods assessed in this report and have been used for consistency.

Size Matters

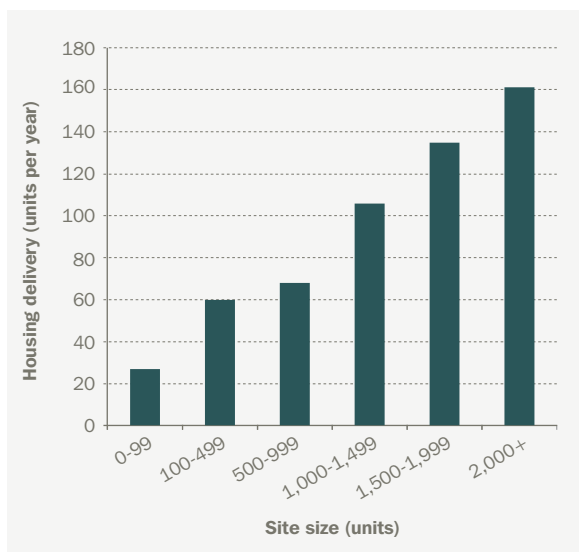
A key metric for build rates on sites is the number of sales outlets. Different housebuilders will differentiate through types or size of accommodation and their brands and pricing, appealing to different customer types. In this regard, it is widely recognised that a site may increase its absorption rate through an increased number of outlets.

Unfortunately, data limitations mean that the number of outlets is not readily available for the large sites surveyed within this research, and certainly not on any longitudinal basis which is relevant because the number of outlets on a site may vary across phases.

However, it is reasonable to assume that larger sites are likely to feature more sales outlets and thus have greater scope to increase build rates. This may relate to the site being more geographically extensive: with more access points or development ‘fronts’ from which sales outlets can be driven. A large urban extension might be designed and phased to extend out from a number of different local neighbourhoods within an existing town or city, with greater diversity and demand from multiple local markets.

Our analysis supports this concept: larger sites deliver more homes each year, but even the biggest schemes (those with capacity for 2,000 units) will, on average, deliver fewer than 200 dwellings per annum, albeit their average rate – 161 units per annum – is six times that of sites of less than 100 units (27 units per annum).

Figure 7: Average annual build rate by site size



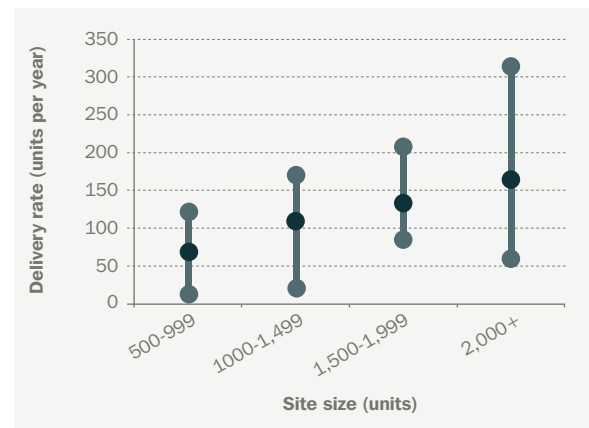
Of course, these are average figures. Some sites will see build rates exceeding this average in particular years, and there were variations from the mean across all categories (see Figure 8), suggesting that higher or lower rates than this average may well be possible, if circumstances support it.

Nevertheless, it is striking that annual average delivery on sites of up to 1,499 units barely exceeds 100 units per annum, and there were no examples in this category that reached a rate of 200 per annum. The highest rate – of 321 units per annum – is for the Cranbrook site, but this is a short term average. A rate of 268 per annum was achieved over a longer period at the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes. The specific circumstance surrounding the build rates in both these examples are explored as case studies opposite. It is quite possible that these examples might not represent the highest rate of delivery possible on large-scale sites in future, as other factors on future sites might support even faster rates.

Our analysis also identifies that, on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:

- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and
- overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.

Figure 8: Average annual build-out rate by site size, including the minimum and maximum averages within each site size



Source: NLP analysis

Cranbrook: East Devon

The highest average annual build out rates recorded in this analysis comes from the Cranbrook site in East Devon where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. Delivery of housing only started on this site in 2012/13, with peak delivery in 2013/14 of 419 dwellings.

Cranbrook is the first new standalone settlement in Devon for centuries and reportedly – according to East Devon Council – the result of over 40 years of planning (this claim has not been substantiated in this research). It is the circumstances surrounding its high annual delivery rate which is of most interest, however.

Phase 1 of the development was supported by a £12 million repayable grant from a revolving infrastructure fund managed by the Homes and Communities Agency. The government also intervened again in the delivery of this site by investing £20 million for schools and infrastructure to ensure continuity of the scheme, securing the delivery of phase 2. The government set out that the investment would give local partners the confidence and resources to drive forward its completion.

The Consortium partnership for Cranbrook (including Hallam Land, Persimmon Homes (and Charles Church) and Taylor Wimpey) stated the following subsequent to the receipt of the government funding¹⁵.

“Without this phase 2 Cranbrook would have been delayed at the end of phase 1, instead, we have certainty in the delivery of phase 2, we can move ahead now and commit with confidence to the next key stages of the project and delivering further community infrastructure and bringing forward much needed private and affordable homes”.

Clearly, the public sector played a significant role in supporting delivery. The precise relationship between this and the build rate is unclear, but funding helped continuity across phases one and two of the scheme. More particularly, the rate of delivery so far achieved relates just to the first three years, and there is no certainty that this high build-out rate will be maintained across the remainder of the scheme.

Eastern Expansion Area (Broughton Gate & Brooklands): Milton Keynes

The second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes where an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research.

Serviced parcels with the roads already provided were delivered as part of the Milton Keynes model and house builders are able to proceed straight onto the site and commence delivery. This limited the upfront site works required and boosted annual build rates. Furthermore, there were multiple outlets building-out on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. This helped to optimise the build rate.

¹⁵ <https://www.gov.uk/government/news/government-funding-to-unlock-delivery-of-12-000-new-homes>

Peak Years of Housing Delivery

Of course, rates of development on sites will ebb and flow. The top five peak annual build-out rates achieved across every site assessed are set out in Table 1 below. Four of the top five sites with the highest annual peak delivery rates are also the sites with the highest annual average build out rates (with the exception of Broughton & Atterbury). Peak build rates might occur in years when there is an overlap of multiple outlets on phases, or where a particular phase might include a large number of affordable or apartment completions. It is important not to overstress these individual years in gauging build rates over the whole life of a site.

Table 1: Peak annual build-out rates compared against average annual delivery rates on those sites

Scheme	Peak Annual Build-Out Rate	Annual Average Build-Out Rate
Cambourne	620	239
Hamptons	548	224
Eastern Expansion Area	473	268
Cranbrook	419	321
Broughton	409	171

Source: NLP analysis and various AMRs

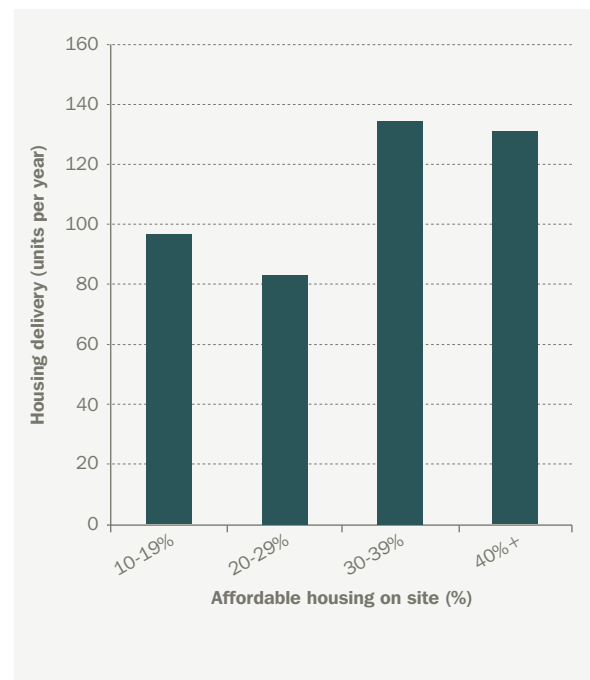
Affordable Housing Provision

Housing sites with a larger proportion of affordable homes (meeting the definition in the NPPF) deliver more quickly, where viable. The relationship appears to be slightly stronger on large-scale sites (500 units or more) than on smaller sites (less than 500 units), but there is a clear positive correlation (Figure 9). For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is around 40% higher compared to developments with 10-19% affordable housing obligation.

The relationship between housing delivery and affordable (subsidised) housing is multi-dimensional, resting on the viability, the grant or subsidy available and the confidence of a housing association or registered provider to build or purchase the property for management. While worth less per unit than a full-market property, affordable housing clearly taps into a different segment of demand (not displacing market demand), and having an immediate purchaser of multiple properties can support cash flow and risk sharing in joint ventures. However, there is potential that starter homes provided in lieu of other forms of affordable housing may not deliver the same kind of benefits to speed of delivery, albeit they may support viability overall.

This principle – of a product targeting a different segment of demand helping boost rates of development – may similarly apply to the emergent sectors such as ‘build-to-rent’ or ‘self build’ in locations where there is a clear market for those products. Conversely, the potential for starter homes to be provided in lieu of other forms of affordable housing may overlap with demand for market housing on some sites, and will not deliver the kind of cash flow / risk sharing benefits that comes from disposal of properties to a Registered Provider.

Figure 9: Affordable housing provision and housing output



Source: NLP analysis

The Timeline of the Build-out Period

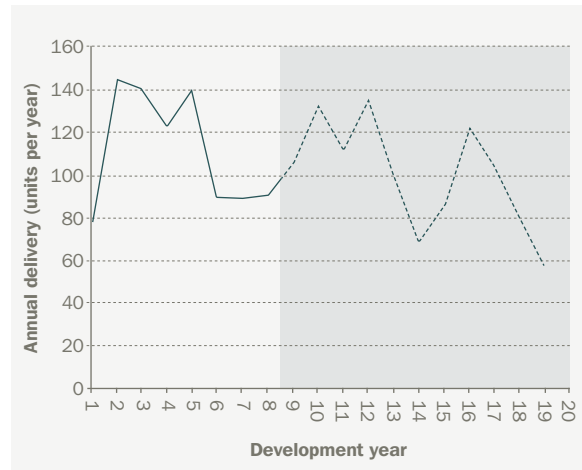
Many planners’ housing trajectories show large sites gradually increasing their output and then remaining steady, before tailing off at the end. In fact, delivery rates are not steady. Looking at the first eight years of development – where the sample size of large sites is sufficiently high – NLP’s research showed that annual completions tended to be higher early in the build-out period before dipping (Figure 10).

For sites with even longer build out periods, this pattern of peaks and troughs is potentially repeated again (subject to data confidence issues set out below). This surge in early completions could reflect the drive for

rapid returns on capital in the initial phase, and/or early delivery of affordable housing, with the average build rate year by year reducing thereafter to reflect the optimum price points for the prevailing market demand. Additionally, the longer the site is being developed, the higher the probability of coinciding with an economic downturn – obviously a key factor for sites coming forward over the past decade – which will lead to a reduction in output for a period.

Our sample of sites where the development lasted for more than eight years is too small to draw concrete findings, but it does flag a few other points. On extremely large sites that need to span more than a decade, the development will most likely happen in phases. The timing and rate of these phases will be determined by a range of factors including: the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues. Predicting how these factors combine over a plan period is self-evidently difficult, but plan makers should recognise the uncertainty and build in flexibility to their housing trajectories to ensure they can maintain housing supply wherever possible.

Figure 10: Average annual build-out rate per year of the build period



Source: NLP analysis

Summary

1. There is a positive correlation between the strength of the market (as measured by residential land values) and the average annual build rates achieved.
2. The annual average build-rate for the largest sites (of 2,000 or more units) is circa 161 dwellings per annum
3. The rate of delivery increases for larger schemes, reflecting the increased number of sales outlets possible on large sites. However, this is not a straight line relationship: on average, a site of 2,000 units will not, deliver four times as fast as a site of 500. This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates.
4. There is significant variation from the average, which means some sites can be expected to deliver more (or less) than this average. However, the highest average build-out rate of all the assessed sites is 321 dwellings per annum in Cranbrook. But this relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure. Such factors are not be present in all schemes, and indeed, the data suggests sites tend to build at a higher rate in initial years, before slowing down in later phases.
5. Build rates on sites fluctuate over their life. The highest build rate recorded in a single year is 620 units at Camborne, but for the duration of the development period the average annual build rate is 239 dwellings.
6. There is a positive correlation between the percentage of affordable homes built on site and the average annual delivery of homes with sites delivering 30% or more affordable housing having greater annual average build rates than sites with lower affordable housing provision. The introduction of different tenures taps into different market segments, so a build to rent product may similarly boost rates of delivery – where there is a market for it – but starter homes may have the opposite effect if they are provided in lieu of other forms of affordable homes, and displace demand for cheaper market homes.

A Brownfield Land Solution?

The NPPF encourages the effective use of previously-developed land, and recent Government announcements suggest increased prioritisation of development for brownfield sites. Efforts to streamline the planning process for brownfield sites may also speed up their delivery. But, is there a difference in how quickly brownfield sites can come forward compared to greenfield sites?

Research produced by CPRE and Glenigan in March 2016¹⁶ suggested that the time between planning permission being granted and construction work starting is generally the same for brownfield and greenfield sites, but suggested that work on brownfield sites is completed more than six months quicker. However, it was not clear if this finding was because the greenfield sites were larger than the equivalent brownfield sites surveyed in that study. We therefore looked at how lead in times and build rates compared for large-scale sites of 500+ dwellings on greenfield and brownfield sites.

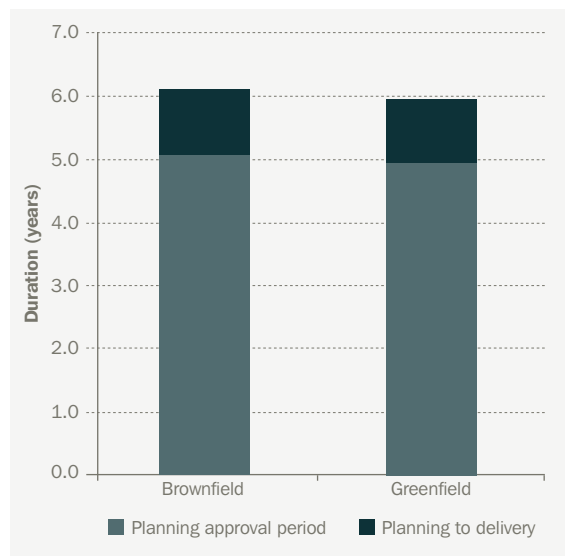
The Planning Approval Period

Whether land is brownfield or greenfield does not impact on the planning approval period. On average, for all sites, the planning approval period for the sites delivering 500 dwellings or more is almost identical at 5.1 years for brownfield and 5.0 years for greenfield – see Figure 11, although this is skewed by the very largest sites of 2,000+ units (see Table 2), with brownfield sites in the smaller-size bands being on average slightly quicker than their greenfield counterparts (albeit caution is required given the small sample size for some size bandings).

What the analysis tends to show is that it is the scale of development – rather than the type of land – which has the greatest impact on the length of planning process, and that despite government prioritisation on brownfield land in the NPPF, this is unlikely to result in significant further improvements in timescales for delivery.

The time period between gaining a planning approval and the first delivery of a dwelling is also similar overall.

Figure 11: Previous land use and duration of planning



Source: NLP analysis

Table 2: Previous land use and duration of planning approval period

	Site Size (dwellings)	Number of sites in this group	Average Planning Approval Period
Greenfield Sites	500-999	14	4.5
	1,000-1,499	9	5.3
	1,500-1,999	7	5.5
	2,000+	13	5.0
	Total/Average	43	5.0
Brownfield Sites	500-999	16	4.1
	1,000-1,499	3	3.3
	1,500-1,999	1	4.6
	2,000+	7	8.6
	Total/Average	27	5.1

Source: NLP analysis

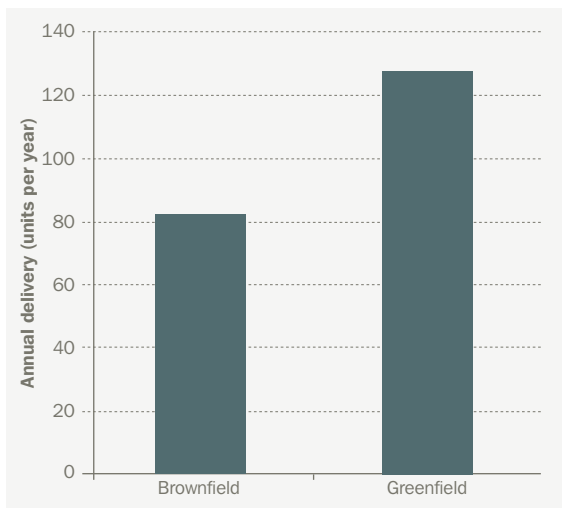
¹⁶ Brownfield comes first: why brownfield development works CPRE, March 2016

Build-out Rates

There is a more discernible difference between brownfield and greenfield sites when it comes to the annual build out rates they achieve, with the analysis in Figure 12 suggesting that brownfield sites on average deliver at lower rates than their greenfield counterparts, both overall and across the different size bandings (see Table 3) albeit recognising the small sample size for some sizes of site. On average, the annual build-out rate of a greenfield site is 128 dwellings per annum, around 50% higher than the 83 per annum average for brownfield sites.

This may reflect that brownfield sites carry extra costs (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provision (which as shown can boost rates of delivery).

Figure 12: Previous land use and housing delivery



Source: NLP analysis

Table 3: Previous land use by size and average annual build out rate

	Site Size (dwellings)	Number of sites in this group	Average Annual Build-out Rate
Greenfield Sites	500-999	14	86
	1,000-1,499	9	122
	1,500-1,999	7	142
	2,000+	13	171
	Total/Average	43	128
Brownfield Sites	500-999	16	52
	1,000-1,499	3	73
	1,500-1,999	1	84
	2,000+	7	148
	Total/Average	27	83

Source: NLP analysis

Summary

1. Brownfield and greenfield sites come forward at broadly similar rates, although at the smaller end of the scale, there does appear to be some 'bonus' in speed of decisions for previously-developed land. For the largest sites (of 2,000+ units) the sample of brownfield sites suggests an extended time period (3.6 years longer) compared to their equivalent greenfield sites;
2. Once started, large-scale greenfield sites do deliver homes at a more rapid rate than their brownfield equivalents, on average 50% quicker.

Conclusion

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, if planners are serious about wanting to see more homes built each year and achieve the government's target of one million by 2020 (or indeed, deliver the 300,000 per annum that are needed), simply allocating a site or granting a permission is not enough. The Government recognises this: the Minister for Planning has been quoted as saying that *"you cannot live in a planning permission"*.

Part of the debate has focused on perceptions of 'land banking' – the concept that developers are hoarding land or slowing down development. Equally, suggestions have been made that proposals for large-scale development should be 'protected' from competition from smaller sites or from challenge under five year land supply grounds. The evidence supporting these propositions appears limited.

In our view the real concern – outside London, at any rate – is ensuring planning decisions (including in plan-making) are driven by realistic and flexible housing trajectories in the first place, based on evidence and the specific characteristics of individual sites and local markets.

Based on the research in this document, we draw five conclusions on what is required:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. Confidence in the planning system relies on this being achieved through local plans that must be sufficiently ambitious and robust to meet housing needs across their housing market areas. But where plans are not coming forward as they should, there needs to be a fall-back mechanism that can release land for development when it is required.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. To secure short-term immediate boosts in supply – as is required in many areas – a good mix of smaller sites will be necessary.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). Trajectories will thus need to differentiate expected rates of delivery to respond to affordable housing levels or inclusion of other market products. This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery. This plays into the wider debate about support for direct housing delivery for rent by local government and housing associations and ensuring a sufficient product mix on sites.
5. Finally, in considering the pace of delivery, large-scale brownfield sites deliver at a slower rate than do equivalent greenfield sites. The very largest brownfield sites have also seen very long planning approval periods. Self-evidently, many brownfield sites also face barriers to implementation that mean they do not get promoted in the first place. In most locations outside our biggest cities, a good mix of types of site will be required.

A Checklist for Understanding Large-scale Site Delivery

In setting or assessing reasonable housing trajectories for local plans or five year housing land supply, the lead-in times and average rates of housing delivery identified in this research can represent helpful benchmarks or rules of thumb, particularly in situations where there is limited local evidence.

However, these rules of thumb are not definitive. It is clear from our analysis that some sites start and deliver more quickly than this average, whilst others have delivered much more slowly. Every site is different.

In considering the evidence justifying the estimated time and rate of delivery, the questions listed in Table 4 below represent a checklist of questions that are likely to be relevant:

Table 4: Questions to consider on the speed of housing delivery on large-scale sites

Lead-in times to getting started on site	Factors affecting the speed of build out rate
<ul style="list-style-type: none"> ✓ Is the land in existing use? ✓ Has the land been fully assembled? ✓ If in multiple ownership/control, are the interests of all parties aligned? ✓ To what extent is there any challenge to the principle of development? ✓ Is the site already allocated for development? Does it need to be in order for release? ✓ Does an SPD, masterplan or development brief help resolve key planning issues? ✓ Is the masterplan/development brief consistent with what the developer will deliver? ✓ Is there an extant planning application or permission? ✓ Are there significant objections to the proposal from local residents? ✓ Are there material objections to the proposal from statutory bodies? ✓ Are there infrastructure requirements – such as access – that need to be in place before new homes can be built? ✓ Are there infrastructure costs or other factors that may make the site unviable? ✓ Does the proposal rely on access to public resources? ✓ If planning permission is secured, is reserved matters approval required? ✓ Does the scheme have pre-commencement conditions? ✓ Is the scheme being promoted by a developer who will need time to dispose of the site to a house builder? 	<ul style="list-style-type: none"> ✓ How large is the site? ✓ Will the scale, configuration and delivery model for the site support more sales outlets? ✓ How strong is the local market? ✓ Does the site tap into local demand from one or more existing neighbourhoods? ✓ Is the density and mix of housing to be provided consistent with higher rates of delivery? ✓ What proportion of affordable housing is being delivered? ✓ Are there other forms of housing – such as build to rent – included? ✓ When will new infrastructure – such as schools – be provided to support the new community? ✓ Are there trigger points or phasing issues that may affect the build rate achievable in different phases?

Appendix 2: Small Sites Reviewed

Site Name	Local Planning Authority	Site Size
Holme Farm, Carleton Road, Pontefract	Wakefield	50
Part Sr3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Former Downend Lower School, North View, Staple Hill	South Gloucestershire	52
Fenton Grange, Wooler	Northumberland	54
Land at the Beacon, Tilford Road, Hindhead	Waverley	59
Land To Rear Of 28 - 34 Bedale Road, Aiskew	Hambleton	59
Hanwell Fields Development, Banbury	Cherwell	59
Land at Prudhoe Hospital, Prudhoe	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School, St Catherines Road	Cherwell	60
Land south of Pinchington Lane	West Berkshire	64
Land Off Cirencester Rd	Stroud	66
Springfield Road Caunt Road	South Kesteven	67
Land off Crown Lane	Wychavon	68
Former Wensleydale School, Dent Street, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site), Gainsborough	West Lindsey	69
Land to the North of Walk Mill Drive	Wychavon	71
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
North East Area Professional Centre, Furnace Drive, Furnace Green	Crawley	76
Land at Willoughbys Bank, Clayport Bank, Alnwick	Northumberland	76
The Kylins, Loansdean, Morpeth	Northumberland	88
MR10 Site, Caistor Road, Market Rasen	West Lindsey	89
OS Field 9972 York Road Easingwold	Hambleton	93
Land At Green Road - Reading College	Reading	93
North East Sandylands	South Lakeland	94
Auction Mart	South Lakeland	94
Parcel 4, Gloucester Business Park, Brockworth	Tewkesbury	94
Former York Trailers Yafforth Road Northallerton Scheme 1/2	Hambleton	96
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Land South of Station Road	East Hertfordshire	111
Former Bewbush Leisure Centre Site, Breezehurst Drive, Bewbush	Crawley	112
Land West Of Birchwood Road, Latimer Close	Bristol, City of	119
Land Between Godsey Lane And Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Kennet Island Phase 1B - E, F, O & Q, Manor Farm Road	Reading	125
Primrose Mill Site	Ribble Valley	126
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Land to the east of Efflinch Lane	East Staffordshire	130
North of Douglas Road, Kingswood	South Gloucestershire	131
Land at Farnham Hospital, Hale Road, Farnham	Waverley	134
Bracken Park, Land At Corringham Road, Gainsborough	West Lindsey	141
Doxey Road	Stafford	145
Former York Trailers Yafforth Road Northallerton Scheme 2/2	Hambleton	145

Site Name	Local Planning Authority	Site Size
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane, Market Rasen	West Lindsey	149
Queen Mary School	Fylde	169
Sellars Farm, Sellars Road	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton	Milton Keynes	176
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Hoval Ltd North Gate	Newark and Sherwood	196
Hewlett Packard (Land Adjacent To Romney House), Romney Avenue	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
GCHQ Oakley - Phase 1	Cheltenham	262
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417, Kingshill North, Cirencester	Cotswold	270
Hortham Hospital, Hortham Lane, Almondsbury	South Gloucestershire	270
Land At Canons Marsh, Anchor Road	Bristol, City of	272
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Long Marston Storage Depot Phase 1	Stratford-on-Avon	284
Land at Brookwood Farm, Bagshot Road	Woking	297
Land at, Badsey Road	Wychavon	298
Land At Fire Service College, London Road, Moreton in Marsh	Cotswold	299
Land At Dorian Road	Bristol, City of	300
Kennet Island Phase 1 - H, M, T, U1, U2 Manor Farm Road	Reading	303
Chatham Street Car Park Complex	Reading	307
Former NCB Workshops, Ellington Rd, Ashington (aka Portland Park)	Northumberland	357
Former Masons Cerement Works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham	Mid Suffolk	365
Woolley Edge Park Site	Wakefield	375
Luneside West	Lancaster	403
Radyr Sidings	Cardiff	421
New World House, Thelwall Lane	Warrington	426
Land at former Battle Hospital, 344 Oxford Road	Reading Borough Council	434
New Central (Land at Guildford Road and Bradfield Close including Network House, Merrion House, Bradford House and Coronation House	Woking Borough Council	445
Kingsmead South	Milton Keynes Council	450
Bleach Green, Winlaton	Gateshead	456
Farington Park, East of Wheelton Lane	South Ribble	468
Bickershaw Colliery, Plank Lane, Leigh	Wigan	471
Farnborough Business Park	Rushmoor	476
Horfield Estate, Filton Avenue, Horfield	Bristol City Council	485
Stenson Fields	South Derbyshire	487
Cookridge Hospital	Leeds	495

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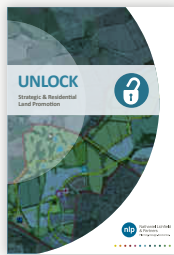
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**Housing Land Supply Position Statement 2018/19
Mid Suffolk District Council**

March 2019

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1.0 INTRODUCTION

- 1.1 This Housing Land Supply Position Statement ('HLSPS') provides information on the five-year housing land supply for the Mid Suffolk district and covers the period from 1st October 2018 to 30th September 2023. All the information reported is the most up-to-date available at the time of publication.
- 1.2 The purpose of this HLSPS is to provide an updated assessment of the housing land supply position in Mid Suffolk, having regard to changes in national policy and guidance in respect of housing requirements and establishing a housing land supply. It has been produced in consultation with key stakeholders, informed by the comments received during the consultation process.
- 1.3 This final report is an informal planning document and does not form part of the statutory Development Plan or any adopted background document such as the Annual Monitoring Report ('AMR'). It is a material consideration in the assessment and determination of planning applications in the district between the date of publication and the date of any other statement on housing land supply (such as may be contained within the AMR) published subsequently.
- 1.4 The five-year land supply position has a base date of 1st October 2018. This is because, the AMR of July 2018, was prepared prior to the new Framework in 2018 and 2019, and therefore necessitated an update to be commenced so that for the purposes of appeals and decision-taking purposes, decisions can be made based upon the most up-to-date evidence. 1st October 2018 represented the earliest practical date for commencement and basing of that evidence.
- 1.5 This report provides the Council's most up-to-date position on five-year housing land supply and the main differences between this report and the 2018 Annual Monitoring Report, published in July 2018 are:
- a. Rebases the housing completion and forecast data covering the period 1st October 2018 to 30th September 2023;
 - b. Reassesses the housing land supply in accordance with new National Planning Policy Framework ('The Framework') (2018, as amended 2019) and updated planning practice guidance ('PPG').
- 1.6 DLP Planning Ltd has worked alongside Mid Suffolk District Council in the preparation of this position statement.
- a) MSDC Housing Land Supply Position Statement - Draft for Consultation January 2019**
- 1.7 The National Planning Policy Framework (NPPF) requires local planning authorities to identify and maintain a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing supply (HLS).
- 1.8 The HLSPS is calculated by comparing the anticipated supply of new homes within the district over a five-year period against the Council's housing requirement. For Mid Suffolk District Council, the housing requirement is established by using the standard method provided by national policy and guidance. This is because the strategic housing policies in the Core Strategy for Mid Suffolk are more than five years old.

- 1.9 The HLS position published within the 2017/2018 Annual Monitoring Report (AMR) of July 2018 was based upon methodology and assumptions appropriate at the date of publication. Since the publication of the AMR, national policy and guidance, in respect of housing requirements and establishing a land supply has been revised. Therefore, the Council has now prepared a HLS position statement, which will update that contained in the July 2018 AMR.
- 1.10 It is important that the Council can adequately evidence its housing land supply position in order to inform decisions made that will continue to deliver new homes to meet ongoing needs. If the Council cannot show that it is meeting these housing needs, their policies with regards to residential development will be considered to be "out of date" and carry less weight when making decision on planning applications. In addition, it is important that stakeholders in the housing sector understand what the current land supply position of the Council is, in light of the change in circumstances following the AMR publication.

2.0 POLICY AND GUIDANCE

- 2.1 This section summarises the national policy and guidance of relevance to this HLSPS and outlines in detail the steps required to demonstrate a robust and transparent housing land supply.
- 2.2 An NPPF/PPG Checklist is provided at appendix 1.
- a) National Planning Policy and Guidance**
- i) Identifying the Housing Requirement*
- 2.3 Paragraph 73 of the 2018 National Planning Policy Framework requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their local housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old. The glossary currently defines local housing need as the number of homes identified as being needed through the application of the standard method set out in national planning guidance or a justified alternative approach.
- 2.4 For Mid Suffolk, the Council's five-year land supply position will be calculated against the local housing need figure (calculated by the standard method) as the existing strategic policies of the Core Strategy are more than five years old.
- 2.5 Paragraph 73 goes on to state that the supply of 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. 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
 - c. 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 2.6 To determine the appropriate buffer, the Framework has introduced the Housing Delivery Test (HDT) which measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the HDT results for each local authority annually. Footnote 39 outlines that from November 2018, the application of a 20% buffer will be measured against the Housing Delivery Test where this indicates that delivery was below 85% of the Housing Requirement.
- 2.7 In addition, paragraph 037 of the PPG (Housing and Economic Land Availability) clarifies this further and outlines that in respect of calculating five-year housing land supply, a buffer should be added to the housing requirement over the plan period, before adding the relevant annual requirement. Buffers are not cumulative, meaning that an authority should add one of the following, depending on circumstances:
- a. *“the minimum buffer for all authorities, necessary to apply ensure choice and competition in the market, where they are not seeking to confirm a 5 year land supply (and where there delivery of housing over the previous 3 years, has not fallen below 85% of the requirement) is 5%;*

- b. *the buffer for authorities seeking to confirm a 5 year land supply, through an annual position statement or recently adopted plan (and where delivery of housing over the previous 3 years, has not fallen below 85%) is 10%; and*
- c. *the buffer for authorities where delivery of housing over the previous 3 years, has fallen below 85% of the requirement, is 20%.”*

2.8 Furthermore, with regards to the Local Housing Need Assessment, the Planning Practice Guidance (‘PPG’) provides greater detail on the approach to be adopted in prescribed circumstances. The PPG directs all local authorities with strategic housing policies plans older than 5 years or where they have been reviewed and found not to be -up-to-date, to use the Government’s local housing need using the standard method as the starting point for calculating the five-year housing land supply (Housing and Economic Land Availability, paragraph 030).

*ii) **Determining the Supply***

2.9 The Framework in Annex 2: Glossary indicates that for sites to be considered ‘deliverable’, they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years. In particular, the definition states that:

“Sites that are not major development, 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.”

2.10 Paragraph 036 of the PPG (Housing and Economic Land Availability) outlines that for sites with outline planning permission, permission in principle, allocated in a development plan or identified in a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- a. *“Any progress being made towards the submission of an application;*
- b. *any progress with site assessment work; and*
- c. *any relevant information about site viability, ownership constraints or infrastructure provision.”*

2.11 The following examples have been provided in Paragraph 036 of the PPG (Housing and Economic Land Availability):

- a. *“a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.*
- b. *a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”*

*iii) **Approach to Preparing Five Year Land Supply Statements***

- 2.12 The PPG outlines at paragraph 047 (Housing and Economic Land Availability) that local planning authorities should consult stakeholders including developers on the range of assumptions used in five-year housing land supply position statements used as benchmarks for the delivery of sites including lead-in times and build-out rates.
- 2.13 Paragraph 052 of the PPG (Housing and Economic Land Availability) advises that local planning authorities should consult “*any specific consultation bodies the authority consider may have an interest, any general consultation bodies the authority consider are appropriate, and any residents or other persons carrying on business in the area from which the authority consider it appropriate to invite representations from*”. The PPG gives the following examples:
- a. small and large developers;
 - b. land promoters;
 - c. private and public land owners;
 - d. infrastructure providers (such as utility providers, highways, etc);
 - e. upper tier authorities (county councils) in two-tier areas;
 - f. neighbouring authorities with adjoining or cross-boundary sites.
- 2.14 Paragraph 052 goes on explain that local planning authorities may wish to set up an assessment and delivery group which could contribute towards Housing and Economic Land Availability Assessments, annual five-year land supply assessments and Housing Delivery Test Action Plans for the delivery of housing.

b) Local Housing Need Calculation for Mid-Suffolk

- 2.15 The LHN method sets out that the most up to date household projections must be used to calculate step 1, the 10-year average is based on 10 consecutive years, with the current year being the first year. In the worked example, the current year is given as 2019. Therefore, a period of 2019 to 2029 has been used to calculate the 10-year average, based upon published Government guidance.
- 2.16 In calculating the LHN for the Council, the following data has been used:
- a. 2014-based household projections (10-year average) = 414.8
 - b. Latest affordability ratio (2017) = 10.17
- 2.17 Average household increase from 2019 to 2029 is 414.8
- a. Households 2019= 44,210
 - b. Households 2029= 48,358

$$10\text{-year average household rate} = -(48,358-44,210)/10 = 414.8$$

- 2.18 The adjustment factor is =0.385625 (10.17-1/4x0.25)

Local Housing Need = 575 dwellings per annum

$$(1+0.385625) \times 414.8 = 575$$

2.19 Local housing need cap is calculated by a 10-year average household growth rate +40%. For Mid Suffolk, this equates to 581 dwellings per annum.

$$414.8 \times 1.40 = 581$$

2.20 The LHN figure (575dpa) is less than the capped figure of 581dpa. Therefore, the LHN figure of 575 dwellings per annum has been identified as the appropriate LHN figure for this assessment, in line with national guidance.

c) Housing Delivery Test Calculation

2.21 The Housing Delivery Test ('HDT') as required by the Framework was published in February 2019 and the results of the HDT are outlined in table 1 below.

2.22 The results of this assessment indicate a buffer of 20% will be applicable to the calculation of the five-year land supply in Mid Suffolk.

Table 1. Housing Delivery Test for Mid Suffolk

Annual Requirement	2015/16 Requirement	424
	2016/17 Requirement	420
	2017/18 Requirement	430
	Total	1,274
Recorded Completions	2015/16 Completions	304
	2016/17 Completions	305
	2017/18 Completions	426
	Total	1,035
Housing Delivery Test Result		81%

d) Previous Housing Requirements

2.23 Prior to the publication of the new National Planning Policy Framework in 2018, there was an identified housing need of 430 dwellings per annum as adopted in the Core Strategy. The standard method for calculating local housing need was adopted by Government in July 2018, and sets a new requirement based on up-to-date information of 575dpa. The Local Housing Need Figure must be used to calculate housing land supply where the adopted Local Plan (or Core Strategy) is more than 5 years old as is the case in Mid Suffolk District. A summary of the difference is set out in table 2 below.

2.24 During the consultation on the Council's Position Statement, the PPG was updated confirming the 2014-based household projections should be used in the calculation of the LHN with the method for calculating the LHN using the standard method updated to state "calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period)". Therefore, when calculating the LHN using the 2014-based household projections and covering a 10-year period of 2019-2029, the LHN for Mid Suffolk is now 575dpa.

Table 2. Summary of Previous Housing Requirements compared to Local Housing Need Figure

	Dwellings Per Annum	Requirement with 20% Buffer
Adopted Core Strategy Requirement	430dpa	516dpa
Strategic Housing Market Housing Assessment Requirement	452dpa	542dpa
Standard Method for Calculating Local Housing Need (2016-based household projections)	590dpa	708dpa
Standard Method for Calculating Local Housing Need (2014-based household projections)	575dpa	690dpa

3.0 EVIDENCE ON THE DELIVERY OF HOUSING

- 3.1 This section reviews national evidence on delivery rates and lead-in times, the performance of national housebuilders and analyses local evidence on delivery rates and lead-in times. The approach advocated in Paragraph 047 of the Planning Practice Guidance (Housing and Economic Land Availability) ('PPG') outlines that assumptions on delivery rates and lead-in times need to be based on clear evidence, consulted upon with stakeholders and reviewed regularly and tested against actual performance on comparable sites.
- 3.2 Paragraph 048 of the PPG (Housing and Economic Land Availability) requires that for annual position statements of five-year housing land supply, for those sites with detailed planning permission, to detail the number of homes under construction and completed each year and where delivery has either exceed or not progressed as expected and the reasons for acceleration or delays to the commencement on site of effects on build-out rates where available, this information is in section 5. Some aspects of paragraph 048 of the PPG have not been possible due to lack of sufficient detail on site by site completion evidence held by the Council.
- 3.3 To inform the lead-in and delivery rates used, the following list of documents have been reviewed:
- a. Letwin Review (2018);
 - b. *Start to Finish How Quickly do Large-Scale Housing Sites Deliver?* NLP Paper (2016);
 - c. *'The Role of Land Pipelines in the UK Housebuilding Process'* by Chamberlain Walker Economics (2017);
 - d. HBF Paper (2016);
 - e. *'Housing Delivery on Strategic Sites'* by Colin Buchanan Report (2005);
 - f. *'Urban Extensions: Assessment of Delivery Rates'* by Savills (2013);
 - g. *'Factors Affecting Housing Build-out Rates'* by University of Glasgow (2008)
- 3.4 The annual reports and trading update statements have also been reviewed for the following national housebuilders:
- a. Avant Homes;
 - b. Barratt/ David Wilson Homes;
 - c. Bellway Homes;
 - d. Bovis Homes;
 - e. CALA Homes;
 - f. Countryside Properties;
 - g. Crest Nicholson;
 - h. Kier Group;
 - i. Linden Homes;
 - j. Miller Homes;

- k. Persimmon Homes;
 - l. Redrow Homes;
 - m. Taylor Wimpey.
- 3.5 Local evidence in Mid Suffolk has also been reviewed on the delivery rates and lead-in times of 10 sites for which the information was available. These sites vary in size from 22 dwellings up to 276 dwellings.
- a) National Evidence on Housing Delivery on Housing Sites**
- (i). Letwin Review (2018)
- 3.6 The Letwin Review was published in October 2018 and was commissioned by the Chancellor of the Exchequer in Autumn 2017 to “explain the significant gap between housing completions and the amount of land allocated or permissioned in areas of high housing demand and make recommendations for closing it”.
- 3.7 The Letwin Review is supported by draft analysis published in June 2018. This identifies that ‘absorption rates’ are the fundamental driver of build-out rates.
- 3.8 The absorption rate appears to be largely determined by the housing type (including size, design, context and tenure) and price of the new home. Meaning that house builders are in a position to exercise control over the sales rate, as rivals are limited in their opportunity to offer customers different types of housing or tenure. For example, when a large housebuilder occupies all/a large proportion of a site, the size and style of the home will be fairly homogeneous, and so demand can be limited. Whereas on a large site, even slight variations in the housing size, style (and context), and physical location on a site, can act to increase demand and absorption rates, leading to higher build out rates.
- 3.9 The report also identifies the types of tenure on offer are critical, and that the rate of completion of ‘affordable’ and ‘social rented’ homes is constrained by the absorption of market rate houses. This is because ‘affordable’ and ‘social rented’ homes are cross subsidised by the sale of market rate houses, thereby when the absorption of market rate houses is limited by the character and size of the homes, the cross subsidy for the non-market-rate housing is limited and the build out rates are reduced.
- 3.10 There is also evidence that smaller sites build out quicker than larger sites. The theory underpinning this is that the market absorption rate for a home is largely location-specific, and there is a limited depth of a market for a given house size, type, and location. Consequently, multiple smaller sites are able to explore multiple different housing markets and therefore the absorption rate is not as limited and build out rates are not constrained.
- 3.11 The Letwin Review is focused upon the delivery of large sites, at present there are no such sites in the supply for Mid Suffolk district. The relevance of these findings is limited.
- (ii). ‘Start to Finish How Quickly do Large-Scale Housing Sites Deliver?’ By NLP (November 2016)
- 3.12 “Start to Finish How Quickly do Large-Scale Housing Sites Deliver?” was published in November 2016 by Nathaniel Lichfield and Partners (NLP). It is a well-regarded national level assessment of housing delivery. This report looks at sites of all sizes, but

specifically focuses on 500+ dwellings. The headline points were as follows (page 3):

- (i). 70 large sites were assessed;
- (ii). 3.9 years was the average lead in time for large sites prior to the submission of the first planning application;
- (iii). 6.1 years was the average planning approval period of schemes of 2,000+. The average for all large sites is circa 5 years;
- (iv). 161 dpa is the average annual build rate for a scheme of 2,000+ dwellings;
- (v). 321 dpa is the highest average annual build rate of the schemes assessed, but this site has only delivered for three years;
- (vi). Higher build out rates can be delivered in stronger markets;
- (vii). Delivery does not increase in proportion to the size of the site. A site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size.

3.13 In respect of lead-in times the research states (page 8):

“Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations”

3.14 A summary of the detailed findings of this report are outlined in table 4.

(iii). *‘The Role of Land Pipelines in the UK Housebuilding Process’ by Chamberlain Walker (2017)*

3.15 A report commissioned by Barratt Developments was undertaken by Chamberlain Walker Economics and was published in September 2017 and entitled *“The Role of Land Pipelines in the UK Housebuilding Process’*. This report looked at the supply of land required by housebuilders in order to maintain and grow the number of homes they build. It focused on sites of more than 20 dwellings and have identified four phases of delivery from pre-application phase to delivery of first completions. The phases are as follows:

Table 3. The Development Pipeline and Its Four Phases

A	Pre-Application (e.g. landownership and control, market conditions, planning context including allocation in Local Plan, preparing for planning application and extent of required community consultation)	= 1.2 to 2.1 years
B	Application to Permission (e.g. inclusion in Local Plan, negotiation of S106, scale of development, performance of LPA)	= 0.5 to 0.8 years
C	From permission to start on site (e.g. landownership, ground works, site infrastructure, discharge of planning conditions)	= 0.6 to 1.0 years New estimate = 1.7 years (21 months)
D	Under construction (build out) (e.g. constraints of speed of construction, site size and market absorption, infrastructure requirements).	Previous estimate = 1.1 to 2.3 years New estimate = 2.3 years (27 months)
Total development pipeline (A+B+C+D)		Total Previous estimate = up to 5.8 years New estimate = up to 6.6 years

Source: Chamberlain Walker Economics Report, Table 2, page 15

- 3.16 The research identifies that the 'post planning permission' stages (C+D) for developments of 20 homes or more has increased markedly to 4.0 years on average from grant of detailed planning permission to site completion, compared to the earlier Local Government Association (LGA) estimates of 1.7 to 3.2 years. This is considered likely to be the result of an increased burden of pre-commencement conditions (Phase C) and an increased reliance on 'large sites' that take longer to build out (Phase D) (page 3).
- 3.17 This 21-month period is consistent with the view of housebuilders that whilst the period taken to gain planning permission has remained broadly unchanged over the last decade or so, post-planning consent delays have grown. This increase may be attributed to the following:
- a. 55.5% of all planning permissions are held by non-builders, leading to the issue of site disposal (to a builder);
 - b. The expiration of a judicial review period;
 - c. Signing of a S106 agreement;
 - d. The number of pre-commencement conditions being attached to planning permissions is increasing, and this is increasing the time taken to discharge such conditions;
 - e. Land held under an options agreement;
 - f. A change in market conditions, for example, an economic downturn can adversely affect sales rates and revenue. This requires the development timescales to be reviewed;
 - g. External factors such as the requirement for provision of local infrastructure.
- (iv). HBF Paper (2016)
- 3.18 This research follows on from the Home Builders Federation (HBF) research earlier in 2016 that undertook a survey of 300 large sites in February and March 2016 in response to the Government's criticism that large sites are only delivering some 48 dwellings a year, (page 1).
- 3.19 In the HBF research, "Large sites" were defined as those with at least 350 dwellings in total, a lower site threshold than the NLP research. In 2015, the average sales on all sites (including start-ups, on-going, tail-ends) was 70 dwellings a year (page 1). In order to omit the low levels of sales that occur at the start and end of a site's delivery and to get an average for when the site was delivering at its best, the research attempted to exclude the lead-in and tail-out elements of a site build-out (penultimate slide). To do this, the research excluded those years from the calculation, of the average those years, in which a site delivered of less than 10 dwellings, less than 20 dwellings and less than 35 dwellings a year. By excluding these years of lower sales rates, the average rate of sales naturally increases, and the results are as follows:
- 70 sales a year – average across all sites;
 - 85 sales a year – average on all sites with 10 or more sales a year:
 - 88 sales a year – average on all sites with 20 or more sales a year:
 - 95 sales a year – average on all sites with 30 or more sales a year:

(v). 'Housing Delivery on Strategic Sites' by Colin Buchanan Report (2005)

3.20 The earliest work by Colin Buchanan ("Housing Delivery on Strategic Sites") was undertaken prior to the recession (2005) and considered delivery rates on strategic sites, mainly within the East of England (paragraph 2.1.5), and reviewed delivery rates on the basis of the size of the site. This research suggests the delivery of an average of 200 dwellings a year on all strategic sites over 1,000 dwellings and that the time between the submission of an application and first construction is 5 years (paragraphs 3.5.2 and 3.5.5). The full details of the report are summarised in table 4.

(vi). 'Urban Extensions: Assessment of Delivery Rates' by Savills (2013)

3.21 This report was commissioned by Barratt Homes and assesses the delivery rates of urban extensions. It tracks 84 urban extensions through the planning system over the last 25 years and focuses on sites of 500+ dwellings.

3.22 More recent evidence relating to urban extensions suggest a build rate of just over 100 dwellings a year, although this has risen to 120 per year in 2013 (page 2).

3.23 It should also be noted that the timescale between submission of outline and completions on site is now averaging about three years (page 1).

(vii). 'Factors Affecting Housing Build-out Rates' by University of Glasgow (2008)

3.24 In terms of the delivery on all sites, the research undertaken by the University of Glasgow for CLG Housing Markets and Planning Analysis Expert Panel – "Factors Affecting Housing Build-out Rates" published in February 2008 by Professor David Adams and Dr Chris Leishman, considered pre-recession evidence and stated at paragraph 2.5 that:

'Most builders generally appear to set a target of between 40 and 80 units built and sold from each outlet annually.'

3.25 In this context, it may be noted that the Savills report concluded in paragraph 6.2 that:

'The typical strategy of most companies who participated in the research was to aim for a build and sales rate of about one unit per week on greenfield sites and slightly higher than this on brownfield sites. Although this confirms anecdotal evidence, it should certainly not be taken as a 'natural build-out rate'. Rather it reflects the particular institutional structure of the British house building industry in which fierce competition for land then requires controlled and phased release of new development to ensure that the ambitious development values necessary to capture land in the first place are actually achieved when new homes are eventually sold...'

3.26 Table 4 below summarises each of these publications and seeks to draw comparisons between each.

Table 4. Summary of Research on Delivery Rates

	Average number of months between events					Submission of App to start on site (years)	Average delivery	Delivery per developer
	Approval of outline	Conclusion of S106	Approval of Reserved Matters	Site prep & signing off conditions	Total number of months			
Sites of 500+ Dwellings								
Colin Buchanan (all sites)						5yrs	188	
Colin Buchanan (sites of 1,000 to 1,999 dwellings or more)						4.7yrs	101	
Colin Buchanan (sites of 2,000 to 1,999 dwellings or more)						5yrs	189	
Colin Buchanan (sites of 3,000 dwellings or more)						5.5yrs	330	
University of Glasgow								55
Hourigan Connolly	24	21	18	12	75	6.25yrs	107	35
Savills 2014 all sites	12	15	15	6	48	4yrs	110	
Savills 2014 (post 2010)	11	6	11	4	32	2.7yrs		
NLP 2016 (sites of 500 to 999)						5.3 – 6.9yrs	70	
NLP 2016 (sites 1,000 to 1,499)						5.3 – 6.9yrs	100	
NLP 2016 (sites of 1,500 to 1,999)						5.3 – 6.9yrs	135	
NLP 2016 (sites more than 2,000)						5.3 – 6.9yrs	161	
Sites of Less than 500 Dwellings								
Home Builders Federation Research (sites of 350+2015)							70 (95)	
NLP 2016 (sites less than 100)						Approx. 2.8yrs	27	
NLP 2016 (sites 100 to 499)						Approx. 4.1yrs	60	
Barratt Report (Chamberlain Walker Economics) 2017 (sites more than 20 dwellings)						2.5yrs		

Sources: Colin Buchanan - *Housing Delivery on Strategic Sites 2005 (table 1)*

University of Glasgow - (CLG housing markets and Planning Analysis Expert Panel) *Factors affecting build out rates (Table 4)*

Hourigan Connolly - *An interim report into the delivery of Urban Extensions 2013 (Summary of individual case appendices 4 to 12)*

Savills - *Urban Extensions Assessment of delivery rates*

Home Builders Federation *Planning Policy Conference presentation by John Stewart 2016*

NLP- *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? 2016 completions estimated from Fig 7 page 1*

Chamberlain Walker Economics - *"The Role of Land Pipelines in the UK Housebuilding Process" (September 2017)*

b) Completions per Outlet from National House Builders

3.27 Most national housebuilders prepare and publish annual performance reports. Within these, the previous years performance results are published. For some instead of delivery rates, a sales rate is given. The levels of completions can be predicted against the average rate of sales or completions per active outlet for the housebuilder concerned extracted from their own annual accounts. The following is a summary of national housebuilder:

- Persimmon: 8,072 new homes legally completed in first 6 months of 2018 with an average of 375 active sites. This equates to 22 sales per outlet in the first 6 months and can expect approximately **44 sales per outlet per year** across the financial year based on these results (Half Year Results 2018).
- Crest Nicholson: 1,251-unit completions in first 6 months of 2018 with 56 full year equivalent outlets. Therefore at least 2,502-unit completions could be expected in full year which results in approximately **44 completions per outlet per year** across the financial year (Half Year Results 2018).
- Taylor Wimpey: Current order book total excluding joint ventures of 9,783 homes with an average of 275 outlets in the year to date. Across the year that would equate to a sales rate of **36 sales per outlet per year** (Trading Statement November 2018).
- Barratt/David Wilson: 12,903 units total forward sales in the year to date with operation from an average of 365 active outlets. This equates to **35 sales per outlet per year** (Trading Update October 2018).
- Bovis: 1,580 completions in first half of 2018 including affordable housing completions with operations from 86 active sales outlets. This equates to approximately **37 completions per outlet per year**.
- Bellway: 10,307 homes sold (including affordable housing) in financial year with 247 active outlets. This equates to **42 sales per outlet per year** (Annual Report 2018).
- Redrow: legal completions at 5,913 including JV with 124 outlets across financial year. This equates to **48 sales per outlet per year** (Full Year Results Presentation 2018).
- Miller Homes: 0.77 net reservations per outlet per week. This equates to **40 sales per outlet per year** (Half Year Results 2018).
- Countryside Properties: Net reservation rate of 0.80 from 60 sales outlets. This equates to **42 sales per outlet per year** (2018 Full Year Results)
- Linden Homes: 3,442-unit completions in the financial year across an average of 85 active sites. This equates to **40 completions per outlet per year** (Galliford Try Full Year Results Statement 2018).

- Kier Group: Sales rate of 0.7 units per week per trading site. This equates to **36 sales per outlet per year** (Annual Report 2018).
- Avant Homes: 1,902 total completions across an average of 42 selling sites. This equates to **45 completions per outlet per year** (2018 Full Year Results).
- CALA Homes: Private sales per site per week equates to 0.62. This is **32 sales per outlet per week** (Full Year Update 2018).

3.28 Sales rates are a reasonable indicator of completions if completion data is not available. Although it is noted that sales tend to run ahead of actual build rates (excluding Bovis, Avant, Crest Nicholson and Linden Homes who record actual completions as new home owners tend to buy off plan and wait for dwellings to be completed. In this regard they are likely to be higher than the actual rates of completion. Also, as these are sales, they do not take into account the provision of affordable housing (except Bovis and Bellway). Therefore, whilst delivery rates will be lower than these sales rates, the final rates of completions on sites may be increased by the provision of affordable housing. As such, these rates are in general conformity with the conclusions of other research regarding the likely rates of delivery referred to earlier in terms of larger sites.

3.29 These examples of national housebuilding suggest delivery in the region of **40dpa per active developer, per site.**

c) Local Market Evidence- Past Delivery

3.30 Since the base date of the emerging Local Plan in 2014, the Council have recorded 1,451 net completions of which 1,008 comprise net completions on all windfall sites and 291 net affordable housing completions.

Table 5. Net Completions by Type 2014-2018, Annual Monitoring Report 2017/18, Table 10

AMR Year	Total Net Completions	No. of Windfall Completions ¹	% of Net Completions	Net Affordable Completions	% of Net Completions
2017/18	426	292	69%	114	27%
2016/17	305	230	75%	53	17%
2015/16	304	240	79%	78	26%
2014/15	416	246	59%	46	11%
Total	1,451	1,008	69%	291	20%

3.31 The Council have also looked at past delivery rates on 14 sites within the district to provide comparable context to the national evidence outlined earlier in the section. It is acknowledged this is a limited sample size, but this was due to the limited availability of the information. Table 6 and 7 below demonstrate that sites over 100 dwellings are delivering on average 76dpa whilst sites of less than 100 are delivering

¹ Includes residential garden land

in the region of 37dpa.

Table 6. Local Evidence on Delivery Rates of Sites Over 100 Dwellings

PP Ref (FULL/OUT/REM)	Site Address	Site Capacity	Dev. Progress	Total Comps	No. of Days between First and Latest/Last Completion	Years Under Construction (No. of Days/365)	Average Comps Per Annum (Total Comps/Yearly Decimal)
M/2722/13/FUL (FULL)	Land at Chilton Leys	215	U/C	163	1,053	2.9	57dpa
M/3153/14/FUL (FULL)	Needham Chalks Ltd	266	U/C	21	69	0.2	111dpa
M/3310/14/FUL (FULL)	Former Masons Cement Works	276	U/C	225	1,084	3.0	76dpa
M/3918/15/REM (REM)	Former Grampian/Harris Factory, St Edmund Drive	190	U/C	49	302	0.8	59dpa
Average: 76dpa							

Table 7. Local Evidence on Delivery Rates of Sites Under 100 Dwellings

PP Ref (FULL/OUT/REM)	Site Address	Site Capacity	Dev. Progress	Total Comps	No. of Days between First and Latest/Last Completion	Years (No. of Days/365)	Average Comps Per Annum (Total Comps/Years)
M /1492/15/FUL	Land W of Farriers Rd, Edgecomb Park, Hybrid App (Phase 1)	75	U/C	477	1.3	31	24dpa
M /0210/15/FUL	Land off Kingfisher Drive/Chalk Hill Rise	23	Comp	403	1.1	23	21dpa
M/0669/08/OUT	Chapel Farm, Off Mill Street	23	Comp	400	1.1	23	21dpa
M /0254/15/OUT	GR Warehousing Site, Old Station Rd	56	U/C n	403	1.1	37	34dpa
M/2910/11/FUL	Former Unilever Site, High Street, Needham Maltings	90	Comp	707	1.9	90	46dpa
M /0958/16/FUL	9 Finborough Road (off Iliffe Way)	22	Comp	407	1.1	22	20dpa
M/1662/14/FUL	Land Adjoining Roundabout, Bury Road	27	U/C	237	0.6	17	26dpa
M/2742/14/FUL	Land at St Marys Road-Phase 2	62	Comp	432	1.2	62	52dpa
M/3112/15/OUT	Land between Gipping Road and Church Road (Phase 1)	75	U/C	196	0.5	47	88da
M/2178/14/FUL	Tranche 2, Steeles Road	34	Comp	321	0.9	34	39dpa
Average: 37dpa							

d) Local Market Evidence- Lead-In Times

3.32 In respect of lead-in times, the following tables consider the past lead-in times of 18 sites in the district. In summary, for sites of 100+ dwellings there is an average lead-in time from submission of application to first completion recorded on site of 2.9 years and for sites less than 100 dwellings, this is 2.6 years. The overall average is 2.8 years which is in line with the national evidence on lead-in time detailed early on in this section of the report (section 3a).

Table 8. Summary of Local Evidence on Lead-in Times

Site Size	Lead-In Time	Sample Size
0-99 dwellings	2.6yrs	14
100-499 dwellings	2.9yrs	4
Average		2.8yrs

3.33 The tables below provide evidence as to how the lead-in times have been calculated.

Table 9. Local Evidence of Lead-In Times of Sites Over 100 Dwellings

PP Ref	Parish	Site Address	New dwellings	Submission of 1 st Application	First Recorded Completion	Days between Submission of Application and Start on Site	No. of Years (Lead-In Times)
M /2722/13/FUL	Stowmarket	Land at Chilton Leys	215	16/09/2013	11/11/2015	786	2.2
M /3153/14/FUL	Needham Market	Needham Chalks Ltd	266	01/10/2014	19/01/2018	1206	3.3
M /3310/14/FUL	Great Blakenham	Former Masons Cement Works	276	17/10/2014	01/03/2016	501	1.4
M /3918/15/REM	Elmswell	Former Grampian/Harris Factory, St. Edmund Drive	190	26/03/2013	01/12/2017	1711	4.7
Average							2.9 years

Table 10. Local Evidence of Lead-In Times of Sites Under 100 Dwellings

PP Ref	Parish	Site Address	New dwellings	Submission of 1 st Application	First Recorded Completion	Days between Submission of Application and Start on Site	No. of Years (Lead-In Times)
M /1492/15/FUL	Combs	Land W of Farriers Rd, Edgecomb Park, Hybrid App (Phase 1)	75	23/04/2015	06/12/2016	593	1.6
M/1008/11/FUL	Badwell Ash	Land adj to Donard Back Lane, Badwell Ash	17	18/03/2011	01/04/2018	2571	7.0
M/2792/13/FUL	Eye	Hartismere Hospital, Castleton Way	60	20/09/2013	28/09/2015	738	2.0
M /0210/15/FUL	Great Blakenham	Land off Kingfisher Drive/Chalk Hill Rise	23	20/01/2015	21/02/2017	1066	2.9
M /0254/15/OUT	Mendlesham	GR Warehousing Site, Old Station Rd	56	22/01/2015	15/12/2017	1058	2.9
M/2910/11/FUL	Needham Market	Former Unilever Site, High Street, Needham Maltings	90	30/08/2011	19/04/2013	598	1.9
M /0958/16/FUL	Stowmarket	9 Finborough Road (off Iliffe Way)	22	23/02/2016	02/02/2017	345	0.9
M/1662/14/FUL	Stowmarket	Land Adjoining Roundabout, Bury Road	27	23/05/2014	24/04/2018	1432	3.9
M/0683/15/FUL	Stowmarket	115 Ipswich Street (Joker's Night Club)	25	20/02/2015	24/10/2018	1342	3.7
M/1850/13/FUL	Stowmarket	Land at Village Centre, Creeting Rd East	70	25/01/2013	31/03/2015	795	2.2
M/2279/13/FUL	Stowmarket	Land at St Mary's Road, Stowmarket	14	19/08/2013	14/05/2015	546	1.5
M/2742/14/FUL	Stowmarket	Land at St Marys Road-Phase 2	62	26/08/2014	18/11/2016	603	1.7
M/3112/15/OUT	Stowupland	Land between Gipping Road and Church Road (Phase 1)	75	27/08/2015	01/08/2018	1070	2.9
M/2178/14/FUL	Woolpit	Tranche 2, Steeles Road	34	08/07/2014	23/03/2016	624	1.7
Average							2.6years

e) Conclusion on Potential Delivery Rates and Lead-In Times

- 3.34 The local evidence available does not exceed sites of 500 dwellings and therefore all comparisons to national and housebuilder evidence is compared to a similar benchmark. Our final assessment below compares the local evidence to those pieces of national evidence which provides comparable figures of sites less than 500 dwellings.
- 3.35 In respect of delivery rates, the local evidence suggests annual delivery on sites could be in the region of 56dpa (table 6 & 7). Whilst the national evidence of sales or delivery rates by housebuilders suggests delivery rates in the region of 40dpa. The NLP research suggests delivery rates on sites of between 0-500 dwellings to be in the region of 27-60dpa.
- 3.36 Local evidence could lead to a conclusion that a delivery rate of 56dpa should be used, however given the relatively small sample size and lower figures from national housebuilders and national research, a delivery rate of **40dpa** is considered to be an appropriate rate of delivery on individual sites. As such, in line with paragraph 047 of the PPG, 40dpa is a reasonable rate of delivery based upon clear evidence. If there is local evidence that a housebuilder has a track record of delivering above this rate of delivery, the higher rate will be used (such is the case for Taylor Wimpey at Chilton Leys, appendix 3a).

Table 11. Comparison of National, Local and Housebuilder Evidence on Delivery Rates on Sites of Less Than 500 dwellings

Type	Lower	Mean	Higher
Local Evidence (MSDC) ²	20dpa	56dpa	111dpa
Housebuilder Evidence ³	32dpa	40dpa	48dpa

- 3.37 Table 12 provides a summary of local evidence compared with national evidence on lead-in times. The lead-in times are calculated from the submission of the application to start on site/first completion being recorded.
- 3.38 This demonstrates that the average lead-in time considering local and national evidence is between 2.6-2.9 years the midpoint 2.7 years has been used as a lead-in time and applied to sites. A lead-in time of **2.8 years** has been applied to sites not yet commenced in the Mid Suffolk district unless there is evidence to suggest otherwise. This is considered more conservative than the evidence on lead-in times for Mid Suffolk as the sample is only based on 18 sites, but 2.8 years is also the mid-range when compared to the Chamberlain Walker and NLP research (table 12).
- 3.39 The lead-in time covers the following stages of the development:
- a. Submission of application to permission (e.g. inclusion in local plan, negotiation of S106, scale of development and performance of LPA);
 - b. Permission to Start on Site (e.g. landownership, ground works, site infrastructure, discharge of planning conditions);

² Section 4(c) of this Report

³ Section 4(b) of this Report

- c. Construction phase to First Completion (e.g. constraints of speed of construction, site size, market absorption, infrastructure requirements).

Table 12. Comparison of National and Local Evidence on Lead-In Times on Sites Less than 500 dwellings

Type	Average Lead-In Time
Local Evidence (MSDC) ⁴	2.6 years
National Evidence (NLP, 2016) ⁵	2.8-4.1 years
National Evidence (Chamberlain Walker Economics 2017)	2.5 years
Average	2.5-2.9 years

⁴ Section 4(c) of this Report

⁵ Table 2 of this Report

4.0 METHOD

4.1 This section sets out the process used and the different criteria and assumptions which are applied in the calculation of the five-year land supply.

a) Method of Consultation

4.2 The draft Position Statement consultation ran for a 6-week period from 17th January 2019 to 28th February 2019.

4.3 The consultation document was published on a dedicated project webpage on the Babergh/Mid Suffolk Councils website with signposting links from the AMR and Housing pages. Emails notifying stakeholders of the consultation and inviting comments were sent to the following parties:

- a. Council Members
- b. Parish Councils
- c. Planning Agents
- d. Developers
- e. Neighbouring Authorities
- f. Infrastructure Providers

4.4 Details of the consultation were also sent to the following press offices:

- a. The East Anglian Daily Times
- b. The Stowmarket Mercury
- c. The Ipswich Star
- d. The Bury Free Press

b) Initial Identification of Sites

4.5 A list was collated of all sites with planning permission at 30th September 2018. This list was then divided into the following categories:

- a. Sites Under Construction;
- b. Sites with Full Planning Permission;
- c. Sites with Outline Planning Permission;
- d. Sites under 10 Dwellings in Size.

4.6 Completions as of 30th September 2018 have been recorded to avoid double counting.

4.7 A planning history and building control records search was undertaken on all sites to check the accuracy of sites included in the supply and those recorded as completed or expired were removed from the supply. Contact was also made with all known landowners/agents/developers to confirm the status of individual sites which had planning permission.

4.8 Over a three-month period, officers sought to secure primary evidence to demonstrate deliverability by engaging in direct telephone and face to face conversations with

individual site developers, their planning agents' representatives on sites. Officers also undertook visits to individual sites to inspect and verify commencement and clarify built-out expectations.

- 4.9 The conversations with developers referred to the evidence requirements in the Framework and PPG and officers asked for details of the progress of the development towards commencement, anticipated build-out rates and any issues that could stall or delay expected delivery. Where, possible, Memoranda of Understanding were signed to reinforce the delivery evidence which existed at 1st October 2018.
- 4.10 Officers visited several sites seeking to inspect any works that would confirm commencement of the development and to count the number of dwelling units delivered at that time. During those face to face conversations with site representatives also secured further, updated information on expected build out moving forward.
- 4.11 As a matter of judgement permissions which are soon approaching expiry have been removed from the five-year supply.

c) Assumptions on Lead-In Times and Delivery Rates

- 4.12 Local and national evidence on delivery rates and lead-in times have been reviewed to identify a lead-in time of 2.8 years from submission of a planning application to first completion/start on site and an annual delivery rate of 40dpa.
- 4.13 The assumptions on delivery rates were identified through the following steps;
- a. A review of national evidence paying particular attention to the NLP Research (the local evidence available does not exceed sites of 500 dwellings and NLP is the only piece of national research which identifies delivery rates in line with the size of sites in Mid Suffolk) which suggests delivery rates on sites between 0-500 dwellings in size to be in the region of **27-60dpa**;
 - b. A review of the levels of sales completions/actual completions per active outlet for 13 national housebuilders. This suggests completions in the region of **40dpa**;
 - c. A review of the delivery of 14 sites in Mid Suffolk ranging from 23-276 dwellings in size. These sites were split into two categories; Under 100 dwellings and Over 100 dwellings in size. This was calculated by identifying the total number of completions to date divided by the number of years (to the decimal) since the first completion was recorded on site. This identified a delivery rate of 76dpa on sites over 100 dwellings in size and 37dpa on sites of less than 100 dwellings in size. The mean rate of delivery is **56dpa**.
- 4.14 An assumption of **40dpa** has been applied to the housing trajectory unless there is evidence to suggest otherwise. For example, Chilton Leys (FUL Ref: M /2722/13/FUL and OUT Ref: M /5007/16/OUT) is currently delivering at 55dpa and Taylor Wimpey, the developer on the site, outline in their MoU that they will deliver 50dpa, therefore 50dpa has been applied to this site, as clear evidence supports the higher rate.
- 4.15 The sample size for lead-in times and delivery rates is small (18 sites in total), however the sites selected were based on available data in the past 3-5 years for which there was a record of all of the following:
- a. Corresponding date of approval;

- b. Known start on site date;
- c. Known completions data.

4.16 With regard to lead-in times, these were identified through the following steps:

- a. A review of national evidence paying particular attention to the NLP Research and the Chamberlain Walker Economics Research which looks at sites of comparable sizes to those identified in Mid Suffolk. These identifies a period of **2.8-4.1 years and 2.5 years** respectively from submission of the planning application to first completion/start on site;
- b. A review of the lead-in times of 18 sites in Mid Suffolk ranging from 14-276 dwellings in size. These sites were split into two categories; under 100 dwellings and over 100 dwellings in size. The lead-in times were calculated from the date the planning application was first submitted to the date the first completion was recorded. This identified an average lead-in time of **2.8 years** for both categories;
- c. The average lead-in time when considering local evidence and national evidence is 2.5-2.9 years (see table 12).

4.17 An assumption of **2.8 years** has been applied to sites in the housing trajectory unless there is evidence to indicate a shorter lead-in time or where due to a prolonged time in determining the planning application, 2.8 years has already passed. For the latter, a lead-in time of 2.8 years was added from the date of approval.

d) Sites Under Construction

4.18 For those sites in the supply which are currently under construction, the first step was to identify the number of units completed by 30th September 2018. For sites where dwellings have already been completed, 40dpa has been added from year 1 unless there is evidence to suggest a different rate of delivery.

4.19 There are some sites which are under construction that have not yet recorded completions. These have been assumed to deliver first completions in year 1 at a rate of 40dpa unless evidence suggests otherwise.

e) Sites with Full Planning Permissions

4.20 For sites in the supply with full planning permission, the following steps were taken:

- a. Check for any potentially expired permissions.
- b. Planning history search to identify if all pre-commencement conditions have been discharged;
- c. Contact was also made with all known landowners/agents/developers to confirm the status of individual sites which had planning permission;
- d. The application of 2.8 years lead-in times from the date of approval and delivery rates of 40dpa, unless the estimated lead-in time period has already passed (i.e. the application was submitted more than 2.8 years ago but permission was only granted in 2018) but permission has only recently been granted. In these cases, the lead-in time has been applied to the date of approval, which effectively results in a longer than 2.8-year lead-in time.

4.21 It should be noted that for Chilton Leys (OUT Ref: M/5007/16/OUT), an MoU has been provided by Taylor Wimpey (c/o Boyer Planning) who outline current progress on each of their sites in the district. This document provides the most up to date number of completions at Chilton Leys to the end of October 2018. However, as the land supply period commences from 1st October 2018, the number of completions has been divided by 10 (no. of months between January and October) and multiplied by 9 (no. of months prior to start of monitoring year) to identify the number of completions on site at Chilton Leys. Therefore, 158 completions recorded on site at 1st October 2018, are an estimation, based on available information.

- e. 46 units recorded as completed between January and October 2018;
- f. $46/10$ months = 4.6 dwellings per month;
- g. 4.6×9 months = 41 dwellings;
- h. 117 completions recorded at December 2017 plus 41 dwellings recorded as completions between January-October 2018 = 158 dwellings completed on site.

f) Sites with Outline Planning Permissions

4.22 A planning history search was undertaken for sites with outline planning permission. Following this, six sites were identified as having clear evidence that completions would be delivered on site within 5 years as required by the definition of 'deliverable' at page 66 of the 2018 Framework.

4.23 Four sites had reserved matters applications submitted by housebuilders (three nationals, and one regional) and validated by the Council before 1st October 2018 and have been included in the five-year land supply on the basis this is clear evidence completions will be delivered on site within five years. It is noted that since 1st October 2018, these reserved matters applications have been approved, reaffirming the clear evidence these sites will deliver completions in the five-year period.

4.24 Memorandums of Understanding have been prepared and signed by the site developer (contained at appendix 3) for the following sites:

- a. Land north of Chilton Leys, Stowmarket;
- b. Land west of Ixworth Road, Thurston;
- c. Land on the North Side of Norton Road, Thurston;
- d. Land to the east of Turkeyhall Lane and to the North of North Close, Bacton.

4.25 MoU's outline the anticipated build rates for the site and comprise of either rates by calendar year (i.e. 2019, 2020, 2021) or by year commencing 1st October 2018 to year ending 30th September 2019. Where delivery rates have been confirmed as calendar year, these have been adjusted to reflect (appendix x).

g) Sites under 10 Dwellings

4.26 For small sites in the supply a full planning history search was undertaken which removed the following types of sites:

- a. Sites with no extant planning permission;
- b. Sites with planning permission for holiday lets or non C3 Class Uses;

c. Sites with permission superseded by a non-residential permission.;

d. Sites already completed.

4.27 The Council directly contacted the agent or applicant on sites with an upcoming or passed expiry date, and where there is no record of commencement and/or the agent or applicant could not confirm commencement have been removed from the supply.

h) Lapse Rate

4.28 No lapse rate has been applied to the Council's five-year land supply calculation.

4.29 In the *Wokingham v SoSCLG and Cooper Estates Strategic Land Limited* (2017) EWHC 1863 High Court judgement, it was concluded that the use of a 10% lapse applied to the whole of the estimated supply was not necessary given the application of a 20% buffer for the same purpose. The Judge determined that an increase to the housing supply by 20% "*where there has been a record of persistent under delivery of housing*" in each case in order to "*provide a realistic prospect of achieving the planned supply*" performed the same function as the application of a lapse rate. It was judged that there was no reason to apply a lapse rate to the whole of the estimated supply as well as a 20% buffer. The Council previously applied a 10% lapse rate to all sites under construction or that had planning permission. The revisions to the definition of 'deliverable' mean that all sites in the five-year supply have planning permission and therefore a lapse rate would be relevant to the entire five-year land supply. This is no longer considered appropriate and has not been applied.

i) Windfall

4.30 In addition to these 4 categories of sites, an assessment of windfall has been undertaken to determine whether the Council can rely on a contribution from windfall sites in the five-year period. The methodology is detailed in section 6. There is no detailed data records held by the Council prior to 2014 which accounts for only 4 years of analysis.

j) Specialist Accommodation

4.31 The Council have only recently begun monitoring specialist accommodation uses such as care homes and sheltered housing. There are no monitoring records for such types of accommodation and have therefore not been included in the supply.

5.0 SITE ASSESSMENTS

5.1 Section 4 of this report identifies the process undertaken in the assessment of Mid Suffolk's housing land supply and the process for removing or including sites when undertaking a review of the evidence. This section goes into detail on a site by site basis providing the justification for including or excluding sites.

a) Sites with Detailed Planning Permission

5.2 Following the assessment of all sites with detailed planning permission, the following sites have been removed from the five-year supply as these permissions are due to expire shortly and there is no evidence or indication that they will be implemented:

- a. Grove Farm, Queen Street (44 dwellings);
- b. Former Scotts/Fisons site, Paper Mill Lane (74 dwellings)
- c. Whitton Park Retirement Home (19 dwellings)

b) Sites with Outline Planning Permission

5.3 The following list of sites have outline planning permission and in accordance with the Framework's definition of 'deliverable' have been included in the Council's five-year housing land supply. It is considered there is clear evidence completions will be delivered on site within 5 years.

5.4 These sites had clear evidence at 30th September 2018 to justify their inclusion in the five-year land supply. MoU's were prepared between November 2018 and January 2019 to support the clear evidence already available at the start of the monitoring year.

Table 13. Sites with Outline Planning Permission Considered Deliverable

Site Address	Planning Reference	Type of Application	Site Capacity	5Yr Supply	Reason for inclusion in 5 Year Supply
Land North of Chilton Leys	M/5007/16/OUT	Outline	600	200	<p>Outline planning permission was granted on 5th July 2018</p> <p>The site is owned by Taylor Wimpey UK Limited a national house builder with a good track record of housing delivery.</p> <p>A reserved matters application for 175 dwellings was submitted in July 2018 by Taylor Wimpey, shortly after the outline application was granted.</p> <p>The Council were aware of this application at the start of the monitoring period of 1st October 2018.</p> <p>Phase 1 for 215 dwellings is already under construction by Taylor Wimpey and nearing completion. The element of the supply to which this relates is Phase 2 for 600 dwellings.</p> <p>Taylor Wimpey and the Council have also signed a Memorandum of Understanding in respect of the site. This document outlines the following:</p> <ul style="list-style-type: none"> • A number of pre-commencement conditions have been submitted under reference DC/18/04761 and will be determined shortly (approved in January 2019); • Confirmation that no additional site assessment works will affect Taylor Wimpey's intention to deliver the site as planned; • Confirmation that unless there is a significant change

					<p>in the housing market viability, financial viability will not affect the deliverability of the site;</p> <ul style="list-style-type: none"> • The outline permission for the wider site is controlled by Taylor Wimpey and therefore there are no issues with site ownership or access affecting the commencement of the site; • The infrastructure to serve the site has already been approved under a full planning application (Ref: 5005/16) and is already under construction. Therefore, the infrastructure will be in place allowing the reserved matters applications to be brought forward promptly and assist the speed of delivery. <p>The MoU confirms the intention of Taylor Wimpey to deliver the site in the region of 50dpa. Phase 1 has delivered in excess of 50dpa in each full year of construction to date and is expected to do so again in 2018 (see appendix x). Taylor Wimpey have a track record of delivering such levels of completions and the evidence supports a deviation from the prescribed delivery rates in section 3.</p> <p>This provides clear evidence of the intention of Taylor Wimpey, a national housebuilder in bringing this site forward, notwithstanding Taylor Wimpey are currently delivering 215 dwellings directly adjacent to the site.</p> <p>It is also of note that the Inspector for the Land on east side of Green Road, Woolpit appeal considered this site to demonstrate the clear evidence required to be included in the five-year supply and considered the site capable of delivering 200 dwellings in the five year supply in his decision dated 28th September 2018 (Ref: 3194926, paragraph 68 and footnote 12)</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>The reserved matters application was approved on 2nd November 2018, by Mid Suffolk Council.</p>
Land adjacent Wetherden Road	M/4911/16/OUT	Outline	240	160	<p>Outline planning permission was granted on 28th March 2018.</p> <p>At 2nd November 2018, the site was owned by J.D. & R.J. Baker Farms Limited. Although it is expected the sale of the site, to Crest Nicholson, will be completed shortly as the reserved matters application has only very recently been approved.</p> <p>A reserved matters application for 240 dwellings was submitted by Crest Nicholson in April 2018, soon after the outline application was granted. The Council were aware of this application at the start of the monitoring period of 1st October 2018 and provided the Council with clear evidence of the intention of Crest Nicholson in bringing this site forward.</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>The reserved matters application was subsequently approved in October 2018.</p> <p>An application was made in May 2018 to discharged 20 conditions, which was subsequently approved in February 2019 under reference (DC/18/02237) and an additional application to discharge conditions submitted in January 2019 to discharge 8 conditions under reference DC/19/00405 also by Crest Nicholson.</p>

Land to the south side of Norton Road	M/5010/16/OUT	Outline	175	160	<p>Outline planning consent was approved on 30th October 2017 on appeal.</p> <p>The site is owned by Green King Brewing and Retailing Limited, but the site is subject to a charge on the land registry register which confirms an option to purchase the land pursuant to an agreement dated 24th May 2013 between Greene King, Mr J Fisher and Mr R Flack and Hopkins Homes (house builder).</p> <p>A reserved matters application for 175 dwellings was submitted in March 2018 by Hopkins Homes, a regional housebuilder. The Council were aware of this application at the start of the monitoring period of 1st October 2018 and provided the Council with the clear evidence needed of the intention of Hopkins Homes in bringing this site forward.</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>The reserved matters application was subsequently granted on 12th October 2018.</p> <p>A non-material amendment application was approved in February 2019 and was submitted by Hopkins Homes. Also submitted by Hopkins Homes was an application to discharge condition 8 (archaeology) is currently pending (DC/19/00735). This reaffirms the intention and commitment of Hopkins Homes delivering the site.</p>
Land west of Ixworth Road, Thurston	M/4963/16/OUT	Outline	250	160	<p>Outline planning consent was approved on 9th July 2018 under reference 4963/16.</p> <p>A reserved matters application for 250 dwellings was submitted in August 2018 by Persimmon Homes, a national housebuilder under reference DC/18/03547. The Council were aware of this application at the start of the monitoring period of 1st October 2018 and provided the Council with the clear evidence needed of the intention of Persimmon in bringing this site forward.</p> <p>The site is owned by Mr Adrian Nice and Mrs Pauline Nice at 12th October 2018, with an option to purchase the site dated 19th July 2018 by Persimmon Homes.</p> <p>An MoU has been prepared and signed between the Council and Persimmon Homes. This MoU is attached at appendix 3. In summary, this outlines that two meetings have taken place since submission of the reserved matters application and amendments have been made to address the comments and expect the application to be presented to planning committee on 13th February 2019. The MoU confirms no issues with viability. The site is under single ownership and Persimmon have an option to purchase the site. Persimmon expect completions of 50dpa from the year 2019/20 although in the absence of a past record of delivery in the district for Persimmon, 40dpa has been applied from 2019/20 in line with local evidence.</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>Due to final amendments sought from Persimmon on the layout, the reserved matters application has been deferred to the 27th March 2019 planning committee and is recommended for approval.</p>
Land on the north side of Norton Road, Thurston	M/5070/16/OUT	Outline	200	140	<p>Outline planning consent was approved on 29th March 2018 and was submitted by Pigeon Capital Investment and Mr Peter Hay.</p> <p>An MoU has been prepared and signed between the Council and Pigeon which is attached at Appendix 3. It outlines that Pigeon Linden Homes as its development partner and the sale of the site to Linden was completed in October 2018. Linden Homes</p>

					<p>prepared a reserved matters application for the site following pre-application discussions with planning officers at MSDC. The MoU confirms no issue with viability. The site is expected to deliver completions from 2019/20 and at a rate of 40dpa which is in line with local evidence.</p> <p>Linden Homes confirmed on 13th March 2019 that the Reserved Matters application was submitted on 8th March 2019 as broadly expected in the MoU.</p> <p>This demonstrates clear evidence that the site will deliver completions in five years.</p>
Land to the east of Turkeyhall Lane and to the north of North Close, Bacton	DC/18/00723/OUT	Outline	51	51	<p>Outline planning permission was granted in July 2018 and was submitted by Pigeon.</p> <p>An MoU has been prepared and signed between the Council and Pigeon which is attached at Appendix 3. It outlines that the site is owned by Cocksedge Building Contractors who will build out the site, who are currently preparing a reserved matters application and expect this to be submitted in early 2019. There are no issues with ownership or financial viability on the site. The MoU expects 30 completions in 2019/20 and 21 completions in 2020/21. These delivery rates have been applied to the trajectory, but completions have been anticipated a year later than identified in the MoU to reflect the local evidence on lead-in times of 2.7 years, as there is no available past record of delivery of the developer to assume faster lead-in times.</p> <p>This demonstrates clear evidence that the site will deliver completions in five years</p>

c) Summary of Housing Land Supply

5.5 Table 14 below outlines the components of housing land supply by type of application.

Table 14. Number of Sites in Housing Land Supply by Type of Permission

Type ⁶	No. of Sites
Under Construction	21
Full Planning Permission	12
Reserved Matters Permission	2
Outline Planning Permission	6
Small Sites (<10 Dwellings)	475
Total Sites	516

⁶ See relevant appendix each trajectory.

6.0 WINDFALL ASSESSMENT

- 6.1 The Framework and PPG allow for local authorities to include a windfall allowance in their five-year housing land supply where there is *“compelling evidence that they will provide a reliable source of supply”* (Framework paragraph 70).
- 6.2 Windfall is defined in the glossary of the Framework on page 73 as *“sites not specifically identified in the development plan”*.
- 6.3 Paragraph 70 of the Framework states that *“any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”*.
- 6.4 Paragraph 048 of the PPG also requires annual position statements of five-year land supply to assess the permissions granted for windfall development by year and how this compared with the windfall allowance.
- 6.5 This section examines the past trends and considers the potential for future delivery of housing on windfall sites across Mid Suffolk and considers whether there is justification to include an allowance for windfall in the five-year housing land supply. Analysis of historic trends and consideration of future windfall sources has been undertaken to ascertain the level of any such allowance.
- 6.6 Monitoring records show that since 2014/15 windfall has consistently delivered a significant proportion of Mid Suffolk’s housing completions. Table 14 presents the total number of windfall completions between 2014/15 and 2017/18 as a proportion of total completions. The table demonstrates that since 2014/15, 69% of net completions on all residential development has been on windfall sites.

Table 15. Windfall as a Proportion of Net Completions⁷

AMR Year	Net Completions	No. of Windfall Completions ⁸	% of Net Completions
2017/18	426	292	69%
2016/17	305	230	75%
2015/16	304	240	79%
2014/15	416	246	59%
Total	1,451	1,008	69%

a) Methodology

- 6.7 Analysis on windfall dwelling delivery rates has been conducted for the 4 years 2014/15 to 2017/18 for which the Council have adequately detailed records.
- 6.8 As part of the analysis, the following types of windfall were removed from the assessment:
- Sites in residential gardens. Although no longer restricted in the inclusion of windfall assessments, this type of windfall as a continued source is uncertain.
 - Sites larger than 0.25ha or more than 11 dwellings in size. These sites have been

⁷ Table 10 of 2017-18 Annual Monitoring Report

⁸ Includes residential garden land

removed, as sites of this size would be expected to be allocated in the emerging Local Plan. The year in which windfalls make a contribution to land supply in this assessment, it is likely that there will have been further progress on the emerging Local Plan, possibly to Plan Examination.

- c. Sites granted through appeal. All sites granted by appeal cannot be relied upon due to the nature of their determination, plus the closer the Council comes to adopting a Local Plan and after adoption, it is likely there will be fewer appeals. Permissions granted by appeal have been removed across all site types.

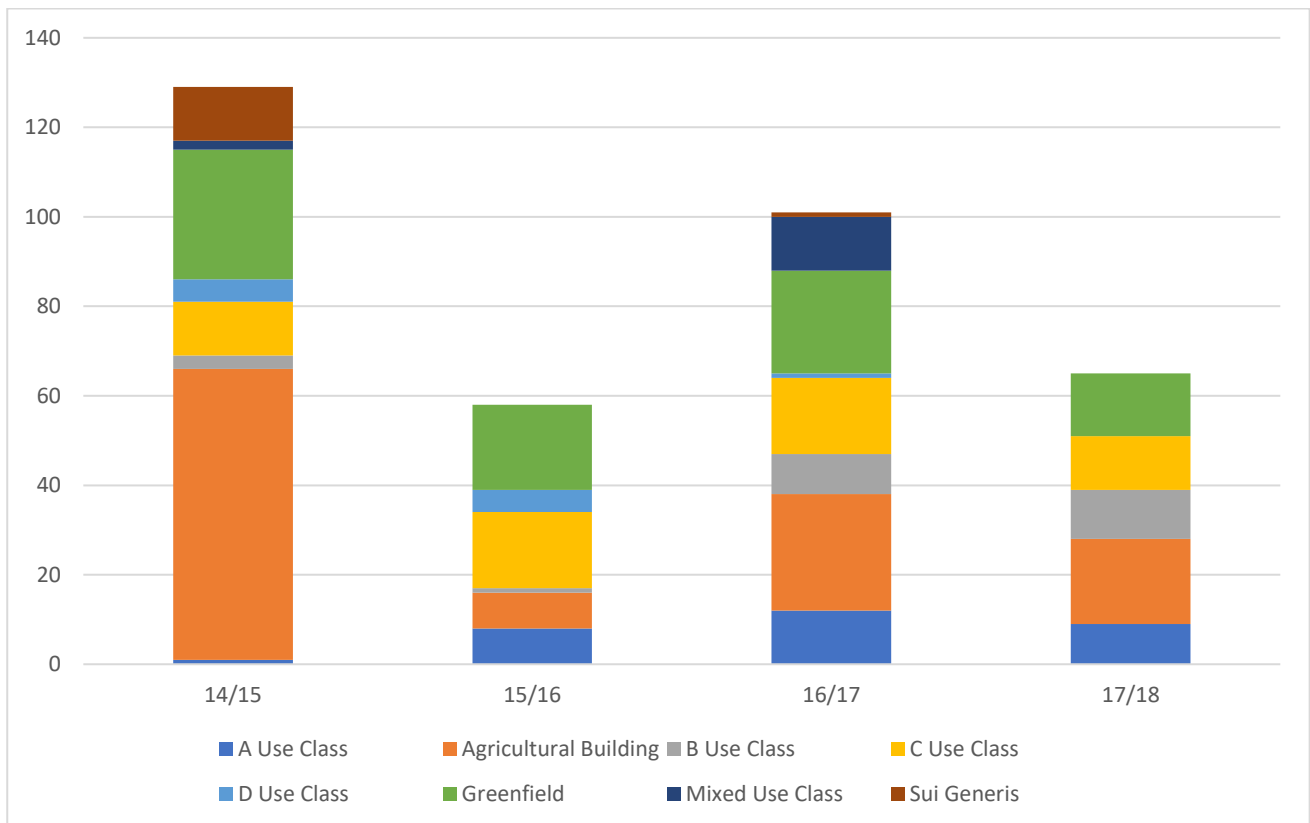
6.9 As a result, a total of 353 windfall completions in the period 2014/15 to 2017/18 are removed following this filtering process.

b) Sources of Windfall

6.10 Following the removal of a number of sites detailed above, the source of remaining windfall sites has been analysed.

6.11 Chart 1 identifies the nature of windfall completions and sites that have come forward over the last 4 years in Mid Suffolk. Sites which have previously been used as agricultural dwellings have contributed the biggest proportion of windfall completions annually over the last 4 years, this equates to 33% of windfall. Greenfield sites have contributed 24% of windfall completions in the last 4 years.

Chart 1: Small Windfall Completions by Source

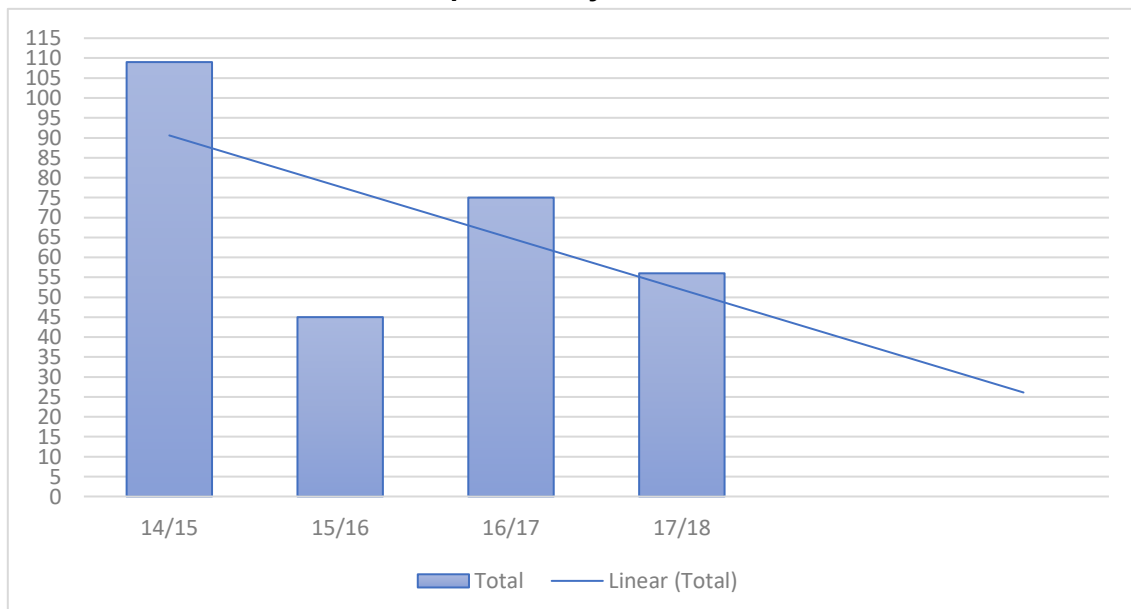


6.12 Given the rural nature of the district and changes in modern agriculture, it is reasonable

to assume that windfall completions on previous agricultural buildings and greenfield sites will provide a future consistent source of windfall.

- 6.13 It is also expected windfall completions on former B Use Class buildings will continue to provide a modest contribution due to the temporary change to permitted development rights remaining and furthermore a contribution can be expected from former C Use Class buildings.
- 6.14 Chart 2 has been produced removing windfall completions from sources which are considered to be unreliable or not providing a constant form of supply, namely:
 - a. A Use Classes;
 - b. D Use Classes;
 - c. Mixed Use Classes;
 - d. Sui Generis
- 6.15 When removing sources of supply likely to be inconsistent, it can be demonstrated that the future trends of those remaining sources is set to decrease and is predicted to be around 25dpa by year 3 (2020/21) when windfalls contribute in the five-year land supply.
- 6.16 This is considered to be an accurate reflection of the Council's intention to adopt a new Local Plan which will provide site allocations and direct development into specific locations thus reducing contribution from windfall sites to annual completions.
- 6.17 A windfall allowance of 25dpa has been applied to years 3, 4 and 5 of the five-year housing land supply to avoid the double counting in years 1 and 2 of smaller sites already in the 5 year supply.

Chart 2: Small Windfall Completions by Year



7.0 LAND SUPPLY POSITION

- 7.1 This section concludes the housing land supply position in Mid Suffolk drawing on the evidence set out in sections 3-6 of this report. The assessment of deliverability as explained, was carried out on all sites, and those which were not considered deliverable have been removed. Overall, there are 516 sites through outstanding permissions which meet the relevant requirements set out in the 2018 Framework and PPG.
- 7.2 Drawing on the evidence on housing delivery from national research, national housebuilder performance and local evidence, a delivery rate of **40dpa** and a lead-in time of **2.8 years** has been applied. This is outlined in detail in section 3 of this report. Where MoUs set out different lead-in times and delivery rates, these have been used. Applying these assumptions to deliverable sites equates to a housing land supply of 3,493 dwellings to 2023.
- 7.3 6 sites with outline planning consent are considered to demonstrate the clear evidence as required by the Framework (2018) to be included in the housing land supply. These three sites had a reserved matters application lodged by a national or regional housebuilder at the start of the monitoring year and have been approved.
- 7.4 No sites are included in the supply which did not have a planning permission on 30th September 2018.

a) Housing Land Supply Components and Housing Land Supply Position

- 7.5 Details of the sites which comprise Mid Suffolk's Housing Land Supply are outlined in table 15. This table also concludes the housing land supply position of Mid Suffolk District Council to be **5.06 years**.

Table 16. Components of Five-Year Housing Land Supply

Housing Land Supply Components	Housing Land Supply 2018-2023	
	Under Construction	1,231
	Full Planning Consent	351
	Reserved Matters Consent	170
	Outline Planning Consent	859
	Small Sites (<10 dwellings)	806
	Windfall Allowance	75
	Total	3,493
Requirement Calculations	Requirement Scenario	
	Base LHN requirement (dpa)	575
	Requirement over 5 years	2,875
	With Buffer @ 20%	3,450
	Dwellings Per Annum	690
5 Year Supply	Council Supply	
	Council Deliverable Supply	3,493
	Years @ 20% Buffer	5.06
	Oversupply/Undersupply	+43

- 7.6 Therefore, as required by the Framework (paragraph 73 and glossary page 66) and in accordance with the guidance set out in the Framework and accompanying PPG, Mid Suffolk District Council can demonstrate a 5.06 years housing land supply.

APPENDIX 1: NPPF/PPG CHECKLIST

A1.1 This appendix provides a check between the paragraphs of the Framework and PPG and which part of this report addresses it (or otherwise).

Reference	Location
Housing Delivery Test (20% buffer)	Section 2c and Table 1, pages 9 & 10
<p>PPG 036/047: relevant to Sites with Outline Planning Consent:</p> <p>Evidence may include:</p> <ul style="list-style-type: none"> • <i>“any progress being made towards the submission of an application;</i> • <i>any progress with site assessment work; and</i> • <i>any relevant information about site viability, ownership constraints or infrastructure provision.”</i> <p>For example:</p> <ul style="list-style-type: none"> • <i>“a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.</i> • <i>a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”</i> 	Section 5(c), page 28-30
<p>PPG 052: Consultation with Stakeholders such as:</p> <ul style="list-style-type: none"> • <i>“small and large developers;</i> • <i>land promoters;</i> • <i>private and public land owners;</i> • <i>infrastructure providers (such as utility providers, highways, etc);</i> • <i>upper tier authorities (county councils) in two-tier areas;</i> • <i>neighbouring authorities with adjoining or cross-boundary sites.”</i> 	See Section 4 and Appendix x for a summary of the consultation responses received.
PPG 047: Assumption on delivery rates and lead-in times to be based on clear evidence.	Section 3, pages 11-24
<p>PPG 048: Assessments will be expected to include:</p> <p><i>“for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates”</i></p>	Available records were not sufficient to adequately evidence this.
PPG 048: Assessments will be expected to include <i>“for small sites, details of their current planning status and record of completions and homes under construction by site”</i>	See Housing Trajectory

<p>PPG:048: Assessments will be expected to include <i>“permissions granted for windfall development by year and how this compares with the windfall allowance”</i></p>	<p>Section 6, pages 31-33</p>
<p>PPG 048: Assessments will be expected to include <i>“details of demolitions and planned demolitions which will have an impact on net completions”</i></p>	<p>See Housing Trajectory</p>
<p>PPG 048: Assessments will be expected to include <i>“total net completions from the plan base date by year (broken down into types of development e.g. affordable housing)”</i></p>	<p>Table 4, page 20</p>
<p>PPG 048: Assessments will be expected to include <i>“the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply.”</i></p>	<p>Table 15, page 34</p>
<p>NPPF Paragraph 73: Standard Method for Calculating Local Housing Need where adopted Local Plans are more than 5 years old</p>	<p>Section 2b, page 9</p>

APPENDIX 2: LIST OF DOCUMENTS REFERENCED

- 1) Babergh and Mid Suffolk Joint Annual Monitoring Report 2017/18:
<https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/FINAL-BMSDC-AMR-2017-18.pdf>
- 2) National Planning Policy Framework (2018):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf
- 3) Planning Practice Guidance:
<https://www.gov.uk/government/collections/planning-practice-guidance>
- 4) Housing Delivery Test Measurement Rule Book:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf
- 5) Letwin Review:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf
- 6) Start to Finish How Quickly do Large-Scale Housing Sites Deliver?" NLP Paper (2016):
<https://lichfields.uk/media/1728/start-to-finish.pdf>
- 7) 'The Role of Land Pipelines in the UK Housebuilding Process' by Chamberlain Walker Economics (2017):
https://cweconomics.co.uk/wp-content/uploads/2017/10/CWEconomicsReport_Land_Banking.pdf
- 8) HBF Paper: Chairman's Update (31/03/2016)
- 9) 'Housing Delivery on Strategic Sites' by Colin Buchanan Report (2005):
<https://www.scribd.com/document/40249959/Housing-Delivery-on-Strategic-Sites>
- 10) *Urban Extensions: Assessment of Delivery Rates* by Savills (2013):
http://www.barrattdevelopments.co.uk/~/_media/Files/B/Barratt-Developments/materials-and-downloads/savills-delivery-rates-urban-extensions-report.pdf
- 11) 'Factors Affecting Housing Build-out Rates' by University of Glasgow (2008):
https://www.gla.ac.uk/media/media_302200_en.pdf
- 12) Avant Homes Full Year Results 2018;
<https://www.avanthomes.co.uk/about-us/corporate-news/avant-homes-announces-reord-financial-results-and-40-per-cent-rise-in-profits-for-2018/>
- 13) Barratt/ David Wilson Homes Trading Update 2018;

<http://www.barrattdevelopments.co.uk/~media/Files/B/Barratt-Developments/press-release/2018/trading-statement-oct-2018.pdf>

- 14) Bellway Homes Annual Report 2018;
<http://www.bellwaycorporate.com/sites/default/files/2018-11/annual-report-2018.pdf>
- 15) Bovis Homes Half Year Report 2018;
<https://www.bovishomesgroup.co.uk/~media/Files/B/Bovis-Homes-Group/documents/reports-and-presentations/2018/half-year-report-2018.pdf>
- 16) CALA Homes Full Year Update 2018;
<https://www.cala.co.uk/~media/files/group/cala-group- fy-update -july-2018.pdf?la=en>
- 17) Countryside Properties Full Year Results 2018;
https://investors.countrysideproperties.com/application/files/8415/4278/3686/FY18_RNS_v1.5.pdf
- 18) Crest Nicholson Half Year Results 2018;
<https://www.crestnicholson.com/investor-relations/reports-results-and-presentations>
- 19) Kier Group Annual Report 2018;
<https://www.kier.co.uk/media/2408/kier-annual-report-2018.pdf>
- 20) Linden Homes Galliford Try Full Year Results 2018;
<https://www.gallifordtry.co.uk/~media/Files/G/GallifordTry/presentation/2018/full-year-results-2018-presentation.pdf>
- 21) Miller Homes Half Year Results 2018;
<https://www.millerhomes.co.uk/corporate/financial/news-and-press/Interim-Results-for-the-Six-Months-Ended-30-June-2018.aspx>
- 22) Persimmon Home Half Year Results 2018;
<https://www.persimmonhomes.com/corporate/media/355105/final-hy18-announcement.pdf>
- 23) Redrow Homes Full Year Results Presentation 2018;
<http://investors.redrowplc.co.uk/~media/Files/R/Redrow-IR-V2/latest-results/2018/analyst-presentation-full-year-2018.pdf>
- 24) Taylor Wimpey Trading Statement 2018:
<https://www.taylorwimpey.co.uk/corporate/investor-relations/reporting-centre/2018>

**APPENDIX 3: COLLECTION OF MEMORANDUMS OF UNDERSTANDINGS
IN RESPECT OF THE FOLLOWING SITES:**

- a. Land north of Chilton Leys, Stowmarket
- b. Land west of Ixworth Road, Thurston
- c. Land on the North Side of Norton Road, Thurston
- d. Land to the east of Turkeyhall Lane and to the North of North Close, Bacton

Appendix 3a: Land North of Chilton Leys, Stowmarket, MoU

Appendix 3b: Land west of Ixworth Road, Thurston, MoU

Appendix 3c: Land on the North Side of Norton Road, Thurston, MoU

Appendix 3d: Land to the east of Turkeyhall Lane and to the North of North Close, Bacton, MoU

APPENDIX 4: HOUSING TRAJECTORY

**APPENDIX 5: SUMMARY OF STAKEHOLDERS CONSULTED AND
COMMENTS RECEIVED**

- A5.1 Appendix 5 provides a summary of comments received, and any changes made from the consultation draft land supply statement.

APPENDIX 6: GLOSSARY OF TERMS

Annual Monitoring Report (AMR): an annual assessment of the implementation of the Local Development Scheme, which monitors the extent to which local development plan policies are being used and performance against other key indicators.

A Use Class: Use of premises for shops, financial and professional services, restaurants and cafes, drinking establishments or hot food takeaways as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

Build-Out Rate: The annual build-out rate on a site.

B Use Class: Use of premises for business, general industrial or storage and distribution as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

Condition Discharge Application: A type of application where a condition in a planning permission or a listed building consent requires details of a specified aspect of the development (which was not fully described in the original application) to be approved by the local planning authority before the development can begin. This is also commonly known as 'discharging' conditions.

Core Strategy: The Core Strategy is one of the development plan documents forming part of a local authority's Local Plan (formerly the LDF). It sets out the long-term vision for the area, the strategic objectives, and the strategic planning policies needed to deliver that vision.

Conditions (or 'planning condition'): A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

C3 Class Use: Use of premises as a 'dwelling house' by a single person or by people living together as a family; or by not more than six people living together as a single household, as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

Deliverable: As defined in Annex 2 of the National Planning Policy Framework (2019) as 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 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.

Delivery Rate: The annual build rate on a site.

Detailed Planning Permission: A planning application seeking full permission for a development proposal, with no matters reserved for later planning approval.

Development Plan: A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This includes adopted Local Plans, neighbourhood plans and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

D Use Class: Use of premises as a non-residential institution or for assembly and leisure as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

First Housing Completion: The date of the first housing completion on site.

Housing Delivery Test (HDT): As defined in Annex 2 of the National Planning Policy Framework (2019) as a mechanism which measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November. The outcome of which determines whether a 5% or 20% buffer is applied to the five-year land supply requirement.

Lead-In Time: This measures the period up to the first housing completion on site from the submission date of the first planning application made for the scheme.

Local Development Scheme (LDS): The local planning authority's scheduled plan for the preparation of Local Development Documents.

Local Housing Need (LHN): The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework) as defined in Annex 2 of the National Planning Policy Framework (2019).

Local Plan: As defined in Annex 2 of the National Planning Policy Framework (2019) as a plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Local Plan Allocation: Sites identified within a Local Plan for housing, industry or other use that identifies a specific area of land to be developed within the time period of the Plan.

Memorandum of Understanding (MoU): A Memorandum of Understanding is a written statement of agreement between the Council and the site developer(s) which confirms the developers' delivery intentions and anticipated start and built-out rates.

Mixed Use Class: Use of premises which provides a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.

National Planning Policy Framework (NPPF): sets out government's planning policies for England and how these are expected to be applied.

National Planning Practice Guidance (PPG): The National Planning Practice Guidance adds further context to the National Planning Policy Framework (“NPPF”) and it is intended that the two documents should be read together.

Net Completions: Measures the absolute increase in stock between one year and the next, including other losses and gains (such as conversions, changes of use and demolitions).

Outline Planning Permission: A general application for planning permission to establish that a development is acceptable in principle, subject to subsequent approval of detailed matters.

Pre-Commencement Condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order which must be discharged prior to commencement of development.

Reserved Matters Application (RM): The application for approval of reserved matters should be made after the grant of outline planning permission and should deal with some or all of the outstanding details of the outline application proposal, including appearance, means of access, landscaping, layout and scale.

Start on Site: The point at which site works commence.

Sui Generis: Uses of land and buildings which do not fall within a specified use class of the Town and Country Planning (Use Classes) Order 1987 (as amended).

Windfall Sites: Defined in Annex 2 of the National Planning Policy Framework (2019) as Sites not specifically identified in the development plan.

Windfall Allowance: An allowance made in the five-year land supply for windfall sites (as defined above).

Purbeck Local Plan Examination

*Neame Sutton Assessment of 5-Year Housing Land Supply
Using Council Housing Requirement*

Jun-19

5-year Supply - Based on 2019 Framework

Housing Supply 01 April 2019 - 31 March 2024	Council	Neame Sutton
Commitments	502	502
Bere Regis NP Allocations	42	0
Swanage LP Allocation	39	0
Wool LP Allocations	215	0
Moreton LP Allocations	50	50
Lychett Matravers and Upton LP Allocations	240	0
Windfalls and Small Sites	315	0
TOTAL	1403	552
cumulative shortfall/surplus	-95	-95
base 5 year requirement	840	840
With shortfall/oversupply	935	935
With 10% Buffer	1029	1029
Adjusted Annual Requirement (5yr)	206	206
5 Year Supply	1403	552
Surplus/Shortfall	375	-477
years Supply	6.8	2.7

Notes:

1. Bere Regis is based on an 'estimate' this fails Annex 2 test
2. Swanage is based on assumption of delivery by Council to a site that does not have consent - this fails Annex 2 test
3. Wool is based on a single email from an agent - there is no clear evidence of timescales for delivery - this fails Annex 2 test
4. Moreton is based on a single email from an agent, which does contain some evidence of timescales for delivery and is considered to barely meet the Annex 2 test
5. Lychett Matravers is based on a single email from an agent - there is no clear evidence of timescales for delivery - this fails Annex 2 test
6. Windfalls and Small Sites are based on a crude assessment of past performance and cannot be said to meet Annex 2 test.

Town and Country Planning Act 1990 (As Amended)

Purbeck Local Plan - Examination

TABLE 1*Neame Sutton Assessment of Housing Trajectory**Using Council Housing Requirement*

Jun-19

		Years 1-5					Years 6-10					Years 11-15				Year 16	
	Total	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Completions																	
Commitments																	
Housing Supply																	
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Wool	470			20	75	75	75	75	75								
Upton/Lychett	240		48	48	48	48											
Wareham	225					20	20	20	20	20	20	20	10	10	15	30	
Bere Regis	105					21	21	21	21								
Swanage	150	50	50	50													
Small Sites	268	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17
Windfall	740	46	46	46	46	46	46	46	46	46	46	46	46	46	46	46	46
TOTAL	2688	113	161	181	186	227	277	229	229	229	133	133	133	123	123	118	93
Housing requirement	2688	168	168	168	168	168	168	168	168	168	168	168	168	168	168	168	168
Annual shortfall/surplus		-55	-7	13	18	59	109	61	61	61	-35	-35	-35	-45	-45	-50	-75
cumulative shortfall/surplus		-55	-62	-49	-31	28	137	198	259	320	285	250	215	170	125	75	0
base 5 year requirement		840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840
With shortfall/oversupply		840	895	902	889	871	812	703	642	581	520	555	590	625	670	715	765
With 10% Buffer		924	985	992	978	958	893	773	706	639	572	611	649	688	737	787	842
Adjusted Annual Requirement (5yr)		185	197	198	196	192	179	155	141	128	114	122	130	138	147	157	168
5 Year Supply		868	1032	1100	1148	1191	1097	953	857	751	645	630	590	457	334	211	93
years Supply		4.7	5.2	5.5	5.9	6.2	6.1	6.2	6.1	5.9	5.6	5.2	4.5	3.3	2.3	1.3	0.6

Notes:

1. Council trajectory does not include any completion data
2. Requirement from LP Policy H1 - 168 dpa
3. Buffer of 10% applied as per LPA calculation
4. Supply data provided by Council by Email dated 28 May 2019

Detailed housing trajectory information which informed the Purbeck Local Plan Submission Document (January 2019)

Please note that the Council intends to update the housing trajectory, for submission to the Inspector by 7 June 2019 in response to the Matters, Issues and Questions.

		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Wool	470			20	75	75	75	75	75	75							
Upton/Lychett	240		48	48	48	48	48										
Local Plan site allocations	1200	0	48	68	123	123	173	125	125	125	50	50	50	50	50	40	0
Wareham	225					20	20	20	20	20	20	20	20	10	10	15	30
Bere Regis	105					21	21	21	21	21							
Swanage	150	50	50	50													
Additional plan allocations*	480	50	50	50	0	41	41	41	41	41	20	20	20	10	10	15	30
Small sites	268	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17
Windfall	740	46	46	46	46	46	46	46	46	46	46	46	46	46	46	46	46
Windfall and small sites	1008	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
	2688	113	161	181	186	227	277	229	229	229	133	133	133	123	123	118	93

Town and Country Planning Act 1990 (As Amended)

Purbeck Local Plan - Examination

TABLE 2*Neame Sutton Assessment of Housing Trajectory***Using Council Housing Requirement - All Allocations Included in 5-year Supply**

Jun-19

	Total	Years 1-5					Years 6-10					Years 11-15			Year 16		
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Completions		73															
Commitments																	
Housing Supply																	
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Wool	470			20	75	75	75	75	75	75							
Upton/Lychett	240		48	48	48	48											
Wareham	225					20	20	20	20	20	20	20	10	10	15	30	
Bere Regis	105					21	21	21	21	21							
Swanage	100		50	50													
Small Sites	165		11	11	11	11	11	11	11	11	11	11	11	11	11	11	11
Windfall	460							46	46	46	46	46	46	46	46	46	46
TOTAL	2255	73	109	129	134	175	225	223	223	223	127	127	127	117	117	112	87
Housing requirement	2688	168	168	168	168	168	168	168	168	168	168	168	168	168	168	168	168
Annual shortfall/surplus		-95	-59	-39	-34	7	57	55	55	55	-41	-41	-41	-51	-51	-56	-81
cumulative shortfall/surplus		-95	-154	-193	-227	-220	-163	-108	-53	2	-39	-80	-121	-172	-223	-279	-360
base 5 year requirement		840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840
With shortfall/oversupply		840	935	994	1033	1067	1060	1003	948	893	838	879	920	961	1012	1063	1119
With 10% Buffer		924	1029	1093	1136	1174	1166	1103	1043	982	922	967	1012	1057	1113	1169	1231
Adjusted Annual Requirement (5yr)		185	206	219	227	235	233	221	209	196	184	193	202	211	223	234	246
5 Year Supply		620	772	886	980	1069	1021	923	827	721	615	600	560	433	316	199	87
years Supply		3.4	3.8	4.1	4.3	4.6	4.4	4.2	4.0	3.7	3.3	3.1	2.8	2.0	1.4	0.9	0.4

Notes:

1. Completion data taken from Page 11 of SD38a
2. Requirement from LP Policy H1 - 168 dpa
3. Buffer of 10% applied as per LPA calculation
4. Supply data provided by Council by Email dated 28 May 2019
5. Adjustment to small sites to reflect correct addition i.e 168/16 = 10.5
6. Given that completion data available for 2018/19 all other supply entries in that year removed
7. Windfall allowance not compliant with Annex 2 of NPPF 2019 in terms of 'clear evidence of delivery' therefore removed for first 5 years

Town and Country Planning Act 1990 (As Amended)

Purbeck Local Plan - Examination

TABLE 3*Neame Sutton Assessment of Housing Trajectory**Using Council Housing Requirement - Adjustments made to 5-year supply to reflect Annex 2 of NPPF 2019*

Jun-19

	Total	Years 1-5					Years 6-10					Years 11-15			Year 16		
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Completions		73															
Commitments																	
Housing Supply																	
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Wool	470							20	75	75	75	75	75	75			
Upton/Lychett	240							48	48	48	48	48					
Wareham	225							20	20	20	20	20	20	30	30	15	30
Bere Regis	105							21	21	21	21	21					
Swanage	0							50	50								
Small Sites	165		11	11	11	11	11	11	11	11	11	11	11	11	11	11	11
Windfall	460							46	46	46	46	46	46	46	46	46	46
TOTAL	2155	73	11	11	11	11	61	266	321	271	271	271	202	212	137	112	87
Housing requirement	2688	168	168	168	168	168	168	168	168	168	168	168	168	168	168	168	168
Annual shortfall/surplus		-95	-157	-157	-157	-157	-107	98	153	103	103	103	34	44	-31	-56	-81
cumulative shortfall/surplus		-95	-252	-409	-566	-723	-830	-732	-579	-476	-373	-270	-236	-192	-223	-279	-360
base 5 year requirement		840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840
With shortfall/oversupply		840	935	1092	1249	1406	1563	1670	1572	1419	1316	1213	1110	1076	1032	1063	1119
With 10% Buffer		924	1029	1201	1374	1547	1719	1837	1729	1561	1448	1334	1221	1184	1135	1169	1231
Adjusted Annual Requirement (5yr)		185	206	240	275	309	344	367	346	312	290	267	244	237	227	234	246
5 Year Supply		117	105	360	670	930	1190	1400	1336	1227	1093	934	750	548	336	199	87
years Supply		0.6	0.5	1.5	2.4	3.0	3.5	3.8	3.9	3.9	3.8	3.5	3.1	2.3	1.5	0.9	0.4

Notes:

1. Completion data taken from Page 11 of SD38a
2. Requirement from LP Policy H1 - 168 dpa
3. Buffer of 10% applied as per LPA calculation
4. Supply data provided by Council by Email dated 28 May 2019
5. Adjustment to small sites to reflect correct addition i.e 168/16 = 10.5
6. Given that completion data available for 2018/19 all other supply entries in that year removed
7. Windfall allowance not compliant with Annex 2 of NPPF 2019 in terms of 'clear evidence of delivery' therefore removed for first 5 years
8. Adjustments made to 5-year supply contribution of allocations to reflect Annex 2 of NPPF 2019

(Consultee 1191476,1191015,1190535)

This statement is made on behalf of the 61 residents of Glebe Road in Lytchett Matravers who strongly oppose this proposed development of 95 houses on Green Belt Land.

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The Lytchett Matravers Neighbourhood Plan very clearly states that Lytchett Matravers is a village that needs to be preserved as a village. However, the large amount of infilling already has resulted in it being the largest village in the Purbecks, but without the growth in services to match the increase in population. The doctor's surgery and the school have remained at the same size for the last twenty years and we challenge their declaration that they have more capacity as untrue. (See Appendix: 1. Extract from Dorset for You website School Allocation) The primary school will take between 3 and 5 years to enable more than the minimum of increases in yearly intake. Residents can wait up to 3 weeks for non-urgent appointments at the doctor's surgery and parking along the High Street and Wareham Road at peak times is so congested that the roads are no longer safe. (See Appendix: 2. Photograph of Wareham Road Traffic) With no employment opportunities and poor public transport, any more development in Lytchett Matravers would only exacerbate the pressure on already inadequate village services. Lytchett Matravers is a dormitory village and wants to retain its rural character away from the conurbation.

b) Was the identification process of the allocations at Moreton Station/Redbridge Pit (Policy H4), Wool (Policy H5), Lytchett Matravers (Policy H6) and Upton (Policy H7) robust, what factors were taken into account in the assessment process to determine the sites for allocation and was the assessment robust?

We are of the opinion that all of the options regarding other, more suitable sites, were not adequately considered in the assessment process. Please see our response to Matter A Issue 4.

Q4. Are the assumptions regarding capacity of each of the allocations justified and based on available evidence?

Such a large development of 95 houses on Green Belt land would be entirely out of keeping with the character of the surrounding area and detrimental to the biodiversity. The deciduous woodland at the east of the site is an important habitat linking with the surrounding countryside. The Dorset Biodiversity Strategy states the importance of maintaining green networks such as these to give safe pathways to wildlife as they move through the district.

The overlooking would also change the character of Glebe Road forever. Houses of 2 and 3 stories on the site's south facing slope would severely overlook and inhibit privacy of residents in Glebe Road, owing to the gradient of the land. Houses would overlook both ground floors and rear gardens. See Appendix 3. Photos of the sloping nature of the site showing how it overlooks Glebe Road.

Furthermore, SHLA0026 says that only a small part of the site on the western boundary is subject to flooding. We know that this is not the case as the whole site is subject to flooding especially in winter. Residents from Glebe Road can testify that they have suffered from flooding, drainage and sewage problems for many years. The run off from 95 houses would exacerbate the problem. See appendix 4: Photograph showing water logged site.

All of these factors brings into question the capacity of the site, yet we are aware that the landowner is pushing for the number to be expressed as 'at least 95'.

Q7. (a) Are the policy criteria set out in the relevant policies justified and effective?

The only criteria included in the relevant policies was improved accessibility between Lytchett Matravers and Lytchett Minster by forming or improving defined walking and cycling routes between the villages and to provide financial contributions for local health infrastructure and education (as required by Policy 11). We have no evidence at all that either of these will be provided. Narrow lanes and farmland between these two villages do not allow for these routes. The allocation of funds does not appear to be specified at this time.

There is no mention of how impacts on the adjoining woodland will be mitigated, how overlooking and loss of privacy would be avoided, or how the village character will be retained.

Q8. (a) Is there sufficient certainty that the necessary and suitable SANGs for the site allocations at Moreton Station/Redbridge Pit (Policy H4), Wool (Policy H5), Lytchett Matravers (Policy H6) and Upton (Policy H7) would be delivered?

Natural England reported that in the case of Lytchett Matravers (SHLA0026) that there should be one SANG to the North of the village and one SANG to the South of the village. The Local Plan only indicates one SANG in the North of the village which is 1.5 miles from the development north of Glebe Road.

As explained under Matter A Issue 5, a SANG it is difficult to see how this SANG would mitigate the effects of development on the southern edge of the village, particularly given that the nearest heathlands that the SANG is intended to divert pressure from, are located to the south (and not to the north).

Q9. Is there an inconsistency between the wording of policy H1 (Local housing requirement) which indicates that ‘Over the plan period of 2018 to 2034, at least 2,688 homes will be required’ and the wording of policies V1, H4, H5, H6 and H7 when referring to the number of homes to be provided on each site?

As explained under Q4, there are a number of factors that bring into question the capacity of the site east of Wareham Road, and do not consider that there is a strong case for the wording to be expressed as a minimum rather than a maximum in Policy H6.

Q10. Is the wording in relation to the requirements of policies H4, H5, H6 and H7 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?

We are concerned that the lack of any further detail means that in effect, planning applications will be judged more against the wording of Policy E12 is too open to interpretation as to what would be acceptable in terms of detailed design requirements. Criterion (a) positively integrates with their surroundings is relatively meaningless. Criterion (d) where appropriate supports and promotes sustainable modes of transportation is unlikely to apply. Criterion (e) avoids and mitigates any harmful impacts from overshadowing, overlooking etc is particularly relevant but may well get balanced against criterion (h) which supports the efficient use of land. Criterion (f) supports biodiversity through

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Appendix 4: Photograph showing water logged site.

Lytchett and Upton area school allocations

Lytchett and Upton allocations 2018

School	On-time (applications received before the 15 January)	Late (applications received between 15 January and 15 April)
Lytchett Matravers Primary	<u>Lytchett Matravers Primary</u>	The school received no late applications but remains oversubscribed
Upton Infants' School	<u>Upton Infants' School</u>	<u>Upton Infants' School</u>
Upton Junior School	The school received no late applications but remains oversubscribed	<u>Upton Junior School</u>

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All of these factors brings into question the capacity of the site, yet we are aware that the landowner is pushing for the number to be expressed as 'at least 95'.

Q7. (a) Are the policy criteria set out in the relevant policies justified and effective?

The only criteria included in the relevant policies was improved accessibility between Lytchett Matravers and Lytchett Minster by forming or improving defined walking and cycling routes between the villages and to provide financial contributions for local health infrastructure and education (as required by Policy 11). We have no evidence at all that either of these will be provided. Narrow lanes and farmland between these two villages do not allow for these routes. The allocation of funds does not appear to be specified at this time.

There is no mention of how impacts on the adjoining woodland will be mitigated, how overlooking and loss of privacy would be avoided, or how the village character will be retained.

Q8. (a) Is there sufficient certainty that the necessary and suitable SANGs for the site allocations at Moreton Station/Redbridge Pit (Policy H4), Wool (Policy H5), Lytchett Matravers (Policy H6) and Upton (Policy H7) would be delivered?

Natural England reported that in the case of Lytchett Matravers (SHLA0026) that there should be one SANG to the North of the village and one SANG to the South of the village. The Local Plan only indicates one SANG in the North of the village which is 1.5 miles from the development north of Glebe Road.

As explained under Matter A Issue 5, a SANG it is difficult to see how this SANG would mitigate the effects of development on the southern edge of the village, particularly given that the nearest heathlands that the SANG is intended to divert pressure from, are located to the south (and not to the north).

Q9. Is there an inconsistency between the wording of policy H1 (Local housing requirement) which indicates that ‘Over the plan period of 2018 to 2034, at least 2,688 homes will be required’ and the wording of policies V1, H4, H5, H6 and H7 when referring to the number of homes to be provided on each site?

As explained under Q4, there are a number of factors that bring into question the capacity of the site east of Wareham Road, and do not consider that there is a strong case for the wording to be expressed as a minimum rather than a maximum in Policy H6.

Q10. Is the wording in relation to the requirements of policies H4, H5, H6 and H7 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?

We are concerned that the lack of any further detail means that in effect, planning applications will be judged more against the wording of Policy E12 is too open to interpretation as to what would be acceptable in terms of detailed design requirements. Criterion (a) positively integrates with their surroundings is relatively meaningless. Criterion (d) where appropriate supports and promotes sustainable modes of transportation is unlikely to apply. Criterion (e) avoids and mitigates any harmful impacts from overshadowing, overlooking etc is particularly relevant but may well get balanced against criterion (h) which supports the efficient use of land. Criterion (f) supports biodiversity through

sensitive landscaping and in-built features would not go as far as it should in terms of considering the impact on the adjoining woodland and existing wildlife corridors that this site provides from it.

Appendices Matter E

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Appendix 1: Extract from Dorset for You Web Site, School allocation

Appendix 2: Photograph showing traffic congestion on Wareham Road.

Appendix 3: Photographs showing the slope of the land and how it overlooks Glebe Road properties.

Appendix 4: Photograph showing water logged site.

Lytchett and Upton area school allocations

Lytchett and Upton allocations 2018

School	On-time (applications received before the 15 January)	Late (applications received between 15 January and 15 April)
Lytchett Matravers Primary	Lytchett Matravers Primary	The school received no late applications but remains oversubscribed
Upton Infants' School	Upton Infants' School	Upton Infants' School
Upton Junior School	The school received no late applications but remains oversubscribed	Upton Junior School

Appendix 2: Photograph showing traffic congestion on Wareham Road.



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FAO: Mrs Helen Nolan
Programme Officer
Purbeck Local Plan
Dorset Council
Westport House
Worgret Road, Wareham
BH20 4PP

7th June 2019

Your ref: Matter E: Housing Policy H4: Moreton Station/Redbridge Pit
Our ref: AB/3742

Dear Mrs Nolan

**Re: Final Written Submissions for the Purbeck Local Plan Examination
– Matter E on behalf of Mr J Lloyd; Representee ref. 1191216**

The following letter has been prepared in support of our final written submissions in advance of the Purbeck Local Plan Examination hearings in July and August 2019. The representation is made on behalf of Mr J Lloyd (1191216) in respect of the land within their control located outside of but adjoining the proposed strategic allocation Policy H4 – Moreton Station/Redbridge Pit.

This letter provides comment specifically in respect of the Inspector's questions in view of the detailed response provided on behalf of our client at the previous Regulation 19 consultation stage.

For the purposes of absolute clarity, the land promoted is 'Land at Maple Lodge, Warmwell Road' (SHLAA Ref. 6/11/1337) which remains available and deliverable. The site adjoins the Council's proposed strategic allocation at Moreton Quarry and can reasonably be brought into the overall area of the allocation; providing a further point of access and opportunity for development or should be brought forwards alongside it.

Issue 1: Housing Allocations

Q1(a)

The Moreton Station/Redbridge Pit site represents a significant area of land which has been subject of minerals excavation and thus sits in a state where it needs to be either restored and thereafter a view had to putting the land in to an alternative viable use in association with its restored state.

The restoration plan for the site and indeed the current phase of extraction is not due to complete until 2023 which will delay the delivery of the site. We consider however that despite this delay, the general principle of the allocation of the site is not unsound, it is of a scale where new infrastructure would need to be and could be provided to support it by way of developed contributions and in respect of upgrading existing services and facilities at Crossways settlement which lies to the south-west.

Having regard for its separation from the principal settlements within Purbeck District however, getting sufficient infrastructure in place will be essential to the success of this development. This will take time and likely result in significant further delays to the overall delivery timeline.

Q1(b)

No Comment.

Q2

No Comment.

Q3

No Comment.

Q4

There is significant pressure on the capacity of proposed allocation H4 to meet in full the policy expectation of 490 dwellinghouses and a 65 bed care home whilst also meeting its SANG needs and delivering local infrastructure improvements to ensure that the needs of future residents can appropriately be met.

The Policy does not appear to cite, or indeed deal with how Public Open Space (POS) will be provided on the site, and indeed the need for this in supplement to the provision of SANG. The extent of POS required to service a development of 490 homes is not insignificant in itself, comprising not less than 3.5ha per 1000 population having regard for the Fields in Trust Guidance which is commonly utilised by the industry as an appropriate blueprint for the size and quality of the recreational provision which should be sought by the Council. Considering this in tandem with the requirement to deliver the SANG for the development on site – itself likely to take up in excess of 50% of the overall land allocation area having regard for an approximate provision in accordance with the Dorset Heathlands Planning Framework of 16ha per 1000 population, the result is the need for a significant increase in housing density within those areas of the site which are to be physically built upon. Consideration must be given to whether the density of housing which will be required is appropriate for the countryside location having regard from its separation from any real urban centre and indeed the principal settlements of Purbeck District.

The Council has sought, at Policy Requirement (d) for any future development scheme to demonstrate consideration for any important trees within the allocation and seek their retention within the layout. This again places additional pressures upon density within the rest of the site and seeks to direct development away from those areas subject of such constraint in favour of this being the location of the SANG and Public Open Space (POS) requirement.

Policy H4 does not itself appear to deal specifically with the need for additional local service provision to meet the day to day needs of local residents in respect of what this service provision may be. Depending on the scale and type of provision this will also be significantly land hungry and difficult to accommodate within the site area available.

Any suggestion that; what is essentially a 50% increase in the overall settlement area of Crossways; to the south-west, and the rather more dispersed populace of Morton, would be able to be serviced by the limited existing local infrastructure and facilities is very questionable. Having regard for a basic service such as supermarket provision, there are no major superstores locally with the nearest provision in either Wareham, comprising a modest Sainsbury's store (11 miles), or the Tesco and Waitrose stores in Dorchester (approximately 7 miles), both of which are of a good scale. The same considerations can be had in respect of school capacity, doctor's surgery provision or indeed other services and facilities; the Council considers it has examined the capacity of these and they would be able to support the new development, however, there does not appear to be clear or convincing justification for this. Having regard for the desire to provide a 65-bed care home on the site, depending on the specific format of the care provision, it is reasonable to expect the need for some format of local centre with retail and other day to day services, to enable needs to be met within close proximity of the site where residents will be able to comfortably walk or travel to. Evidently should the intention be to provide a pure Class C2 care home product as opposed to sheltered housing or extra-care type products, the proximity to local services and facilities is less important, however this still remains essential for the market and affordable housing elements of the allocation. It is surprising that the allocation has not directly sought the delivery therefore of some element of retail provision and indeed other specific services and facilities to address specific deficiencies in local provision.

The Council does not appear to have undertaken this assessment to inform the policy or indeed what is likely to be reasonably required. We cannot comment directly on what exact service and facility provision is required, however this does not appear to have been deliberated by the Council in devising the policy. The Council indeed states at Paragraph 124 of the supporting text that *the needs of residents will be met by services and facilities in Crossways and elsewhere.*

All of the indicators here point to a significant strain being put on the capacity of the land allocation and indeed the quantum of land available to fully meet the expectations of the policy and deliver a sustainable development.

There are additional contiguous land parcels, such as the land promoted by our client Mr Lloyd, which sits contiguous to the development site and addresses Station Road, which could be brought in to the allocation and further supplement the land area

available and enable the provision of additional services or facilities or indeed a lessening of the overall density of the development. Land at Maple Lodge could also provide a suitable location for an additional access into the allocation from Station Road, having regard for the quality of visibility along this long straight road. We indeed refer the Inspector to the submissions made by our client at Regulation 19 consultation stage in support of the inclusion of the site within the overall allocation.

The Council has not given sufficient consideration to the availability of supplemental land which could ease the significant competing pressures upon the site and its overall capacity. This is without any consideration being given to the suitability of the remediated land for development; having regard for the costs and complexities in constructing upon infilled or made-up ground.

It would appear sensible to include all of the available land up to Station Road and Warmwell Road within the allocation where landowners are willing to make this available for development in order to contribute to comprehensiveness.

Q5

No Comment.

Q6(a) – (c)

It is considered that the Council would be better capable of seeing an initial phase of delivery from the proposed Allocation H4 by seeking to draw in those other land parcels addressing Station Road which currently sit outside of the allocation and are not constrained by the completion of the quarrying activities and remediation which needs to take place on the main land area before any development can occur. This would enable some initial development to come forwards.

Q7(a)

As discussed above in response to Q4, it is considered that the policy is not sufficiently prescriptive and has not given due consideration to the extent or type of service and facility provision which reasonably should be delivered in association with this strategic allocation.

The policy does not provide sufficient comfort that this matter has been adequately addressed by the Council so as to demonstrate that the proposed strategic site is capable of meeting all of the policy requirements without the need for either (1) a reduction in the overall housing delivery numbers; which we would not advocate having regard for the Council's housing need, or (2) the drawing in of additional land in to the allocation; a strategy which we would support.

Q7(b)

No Comment.

Q8(a)

We have no comments on the quality of the SANG provision. Comments are made solely in respect of Policy H4.

We however raise concern over the capacity of the site to deliver both the anticipated quantum of housing development, SANG, POS and other related infrastructure; all of which will be competing for space on a site which has other constraints such as trees and other landscape features which the Council is seeking to retain as part of the policy wording. The reality perhaps being that there will be a need for some additional land to ensure that the policy desires can be met in full.

Q8(b)

No Comment.

Q9

Policy H1 confirms the Council's delivery intention to deliver 2,688 homes within the plan period. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA 2018 and 1,273 dwellings when compared with what we consider to be the actual needs for the District as calculated by the standard methodology.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocate additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty that the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

Q10

We do not consider, as discussed above, that the policy wording relating to strategic allocation Policy H4 is sufficiently robust to confirm what the Council expect to be delivered by the strategic site. It is considered that the Council should review the requirements, having regard for viability evidence, in order to demonstrate what the site can reasonably be expected to deliver and whether there is a need for a revision in the expectations in terms of delivery from the site.

The alternative position to reducing the deliverable figure, should this be necessary, being to consider the allocation of additional land contiguous to the site which may aid and contribute towards the delivery of a sustainable and comprehensive development.

Our client Mr Lloyd is willing to make his land available for this purpose.

Issues 2 – 4

We have no additional comments to make in respect of these matters. We direct the Inspector's attention to the points raised within our Regulation 19 consultation response in this regard.

Yours sincerely

A black rectangular redaction box covering the signature of Adam Bennett.

Adam Bennett BA (Hons)
Town Planning Consultant

Direct email: adam@kppcltd.co.uk

Website: www.kenparkeplanning.com

FAO: Mrs Helen Nolan
Programme Officer
Purbeck Local Plan
Dorset Council
Westport House
Worgret Road, Wareham
BH20 4PP

7th June 2019

Your ref: Matter E: Housing
Our ref: AB/3056

Dear Mrs Nolan

**Re: Final Written Submissions for the Purbeck Local Plan Examination –
Matter E on behalf of Westcoast (Purbeck) Ltd; Representee ref.
1191219**

The following letter has been prepared in support of our final written submissions in advance of the Purbeck Local Plan Examination hearings in July and August 2019. The representation is made on behalf of Westcoast (Purbeck) Ltd (1191219) in respect of the land within their control at Binnegar Hall, Worgret Road, East Stoke, BH20 6AT.

This letter provides comment specifically in respect of the Inspector's questions in view of the detailed response provided on behalf of our Client at the previous Regulation 19 consultation stage.

Issue 2: Housing Land Supply

Q1

No Comment

Q2

No Comment

Q3

No Comment

Q4

In our view there is no compelling evidence that the level of windfall delivery required to deliver 1033 Dwellings (100 in Wareham and 933 in the rest of the plan area) from windfall sites will be achieved. In order to achieve that supply it would be necessary to deliver 64 dwellings per annum solely through windfalls.

Recent completion statistics for the former Purbeck District Council area does not support the view that such a level of provision could be achieved or sustained:

2012-2013 – 79 Dwellings completed
 2013-2014 – 72 Dwellings completed
 2014-2015 – 67 Dwellings completed
 2015-2016 – 232 Dwellings completed
 2016-2017 – 89 Dwellings completed

These figures include both completions from windfalls and from allocated sites. In light of the historically low levels of housing delivery, there is no compelling evidence that the significantly increased levels of windfall delivery required to meet the levels indicated in the plan can either be achieved or sustained.

Having regard to the fact that our assessment indicates that the Council has failed to plan for sufficient housing delivery in any event there is a clear need to allocate further land for development rather than seeking to rely on a windfall figure for which there is no compelling evidence.

Q5

We do not consider that the approach of not allocating any small sites is consistent with national policy. Paragraph 68(a) of the framework indicates that policies should identify sites to accommodate at least 10% of housing requirements on small sites unless there are strong reasons why this target cannot be achieved.

The decision to include a policy allowing for small sites to come forward indicates that the Council considers that such sites are available and can contribute to the supply of housing. Therefore, in accordance with paragraph 69 it is considered that the Council should look to identify specific sites for inclusion within the plan.

Q6

No comment

Q7

No Comment

Q8

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly

undersupply at the back end of the plan period. The precise delivery figures proposed are not clear, however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded. The promoted site; Binnegar Hall, is a previously developed site which is subject to no significant constraint and is located outside of both the Green Belt and Dorset Area of Outstanding Natural Beauty (AONB) and outside of the protected 400m designation of the Dorset Heathlands Special Protection Area (SPA).

The site is subject of an existing planning consent for housing development which is currently being built out and the Council are in receipt of a more substantial application for the development of the rest of the site for 49 dwellings with associated open space and SANG provision. There is no issue with the principle of the development and thus there is no reason why the Council should not seek to support this site as a formal allocation within the Local Plan.

Issue 3: 5 Year Housing Land Supply

Given that the plan fails to meet the full housing need as calculated in accordance with the standard methodology it is considered that at adoption the plan will not be able to deliver a 5 year housing land supply at adoption or maintain such a supply through the plan period.

Issue 4: Other Housing policies

Q1

No Comment

Q2 – Q4

It is considered that in light of the significant doubts over the ability of the Council to deliver the level of windfall development allowed for, that the plan should be seeking to allocate additional specific small and medium scale sites to deliver housing. We do not consider that in its current form, policy H8 is consistent with national policy in respect of the green belt and by failing to identify specific sites for the delivery of housing, it prevents cumulative effects from being considered at this stage.

Q5

It is not considered that the requirements of policy H9 are justified. The justification provided refers to the 2018 SHMA which identifies the need for a mix of house sizes and the age profile of the area. However, it is not appropriate to mandate a proportion of single storey dwellings on that basis. The requirement does not take any account of local circumstances or urban design objectives.

There are a number of specialist providers of housing for the elderly and the predominant model is of flatted development as opposed to single storey dwellinghouses. The latter is unsustainable and land-hungry and is therefore not consistent with national policy and the requirement to make efficient use of land.

The mandated delivery of self-build plots would be unworkable as it would lead to piecemeal development which could not be delivered efficiently or effectively take account of their plot constraints. While self-build housing has a place, it requires careful management design coding on sites where it has been envisaged from the outset, not individual plots in the midst of housebuilder led schemes.

The policy is not sufficiently clear to enable certainty for development management purposes, particularly in respect of the information that would be required to justify a departure from the requirements indicated. The policy merely states that applications will be required to provide full justification of exceptional circumstances to the Council's satisfaction. This is not consistent with paragraph 16 of the framework which requires at section d that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

Q6

We intend to rely on representations made at previous consultation stages in respect of this matter.

Q7

We intend to rely on representations made at previous consultation stages in respect of this matter.

Q8

No Comment

Q9

No Comment

Q10

It is considered that the proposed policy fails the test of being effective. The purpose of the policy is to ensure that housing which is delivered is made available for local needs. However, the policy could make affordability worse by placing a premium on existing housing stock whose occupation is not restricted. It would also lead to unexpected consequences such as preventing the replacement of existing second homes.

It is considered that should the Council seek to enforce the policy through the imposition of a condition, that the condition would fail the six tests as it would be unreasonable and unenforceable.

Q11

No Comment

Q12

No Comment

Q13

No Comment

Yours sincerely

A black rectangular redaction box covering the signature of Adam Bennett.

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Dorset.

BH20 6EE

Tel. No. [REDACTED]

Dear Miss Nolan,

Examination of the Purbeck Local Plan

I am extremely disappointed that I will not be able to attend either the July or August dates for the Hearing Sessions despite earnestly intending to do so. Regrettably, holidays booked months ago overlap these dates.

I do however, ask you to consider the issues raised in my submission to Purbeck District Council following publication of the final Draft Local Plan. With your permission, I would like to underline the importance I attach to four issues in particular.

Firstly, I consider it underhand, deceitful and possibly illegal for the Council to ask the public to cast their vote in favour of a particular Option only to change the content of that Option once those votes had been cast. The details are as follows: -

The Consultation Document contained three options for housing in Wool namely, for 470, 650 or 800 houses. The folk of Purbeck indicated their preference for the 470 house Option. The Council accepted this but then later added a 65-bed care home and a village hub (presumably meaning shops ?). Had these later additions been known about and spelt out in the Consultation Document, then I would not have voted for that Option (and I know of many others of the same view).

In similar vein, in 2004 Purbeck District Council were planning to build 2400 houses by 2026 yet they stated that NON should be built in Wool - see below.

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Purbeck new housing plans to exclude Corfe and Wool

By Zoe Kleinman
BBC Reporter, Dorset

Corfe Castle and Wool should not be considered as sites for new housing developments, said members of Purbeck District Council.

In a public meeting on 12 October the board agreed to omit the two villages from its future plans.

Under government rules, 2400 new homes must be built in Purbeck by the year 2026.

Residents of Wool argued that 191 new homes have already been built around the village in the last five years.



Proposals for 30 new houses in the village of Corfe, were voted against

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This stance was re-affirmed in 2012 with the Council stating that they were concerned that any development to the west of the village would inevitably lead to housing creep towards an area of Outstanding Natural Beauty and they were opposed to any such development.

People have bought houses or have chosen to remain in the village on the basis of these statements, as I think they are entitled to do. Yet if the Council can seemingly and arbitrarily ignore such statements without penalty, what value can be placed on any utterances made by them ?. What price democracy ?. There IS no democracy here which inevitably has led to concerns about the propriety and motives behind the whole process; without democracy, openness and accountability, such exercises are utterly meaningless.

The second issue concerns the very real potential for the flooding of houses on Oakdene Road. The fields to the west slope markedly from the southwest to the northeast i.e. towards the houses on Oakdene Road.

Below are three photos taken earlier this year during a period of normal winter rainy weather.

n.b. The first two pictures are not particularly clear but hopefully illustrate the problem; all three photos were taken within a 30-minute period.



This picture shows a lake beginning to form behind the hedge directly alongside the main Dorchester Road.



This picture shows water beginning to “stream” directly at the bottom of our garden (which it should be noted is nearly 2 feet LOWER than the field where water is beginning to collect).



This picture shows the manhole covers blowing outside the butchers shop on Dorchester Road (this shop is in line with Oakdene Road). Several other manhole covers down towards to railway station were similarly blowing.

These pictures (showing an event that is *not* unique) are really alarming in that they show how inadequate is the existing drainage system despite having three large fields currently acting as natural soak ways, yet these are the very fields on which large housing development is planned. Where is the water to go once these natural soak ways are replaced by concrete and tarmac ?. A site visit if deemed appropriate, would illustrate my concerns from a garden perspective far better than these photographs.

The third issue concerns the siting of large numbers of housing in Wool. There is a misconception in both local and national government that the creation of jobs in a particular area automatically leads to a demand for houses in that area. This is demonstrably not true for Wool. There is evidence that people relocating themselves and their families to Dorset from other parts of the UK choose NOT to live in Wool because of the lack of amenities and facilities (both educational and recreational) available to the whole family; nothing in the Local Plan will change this. Similarly, those already in employment in the Dorset area, whose companies relocate to the Innovation Park, will just travel to their new site rather than move house. The planned houses are simply in the wrong place and more traffic congestion will be the inevitable result.

The fourth issue is simply to highlight the destruction of wildlife habitat that will be the result of replacing organic green fields for houses that are not needed in Wool on the scale envisaged; and this against the recently highlighted background of the need to protect our diminishing natural world. The photo shows what will be lost.



I do hope that the above is helpful to you.

Sincerely

Trevor Hayles

24th May 2019