Town and Country Planning Act 1990 (As Amended)

Tunbridge Wells Borough Local Plan **Examination - MAIN MODIFICATIONS REPRESENTATIONS**

ASSESSMENT OF HOUSING TRAJECTORY AND LAND SUPPLY

On Behalf of:

Rydon Homes Limited

09 February 2024 V1



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February 2020

1.0 **Instructions and Introduction**

- 1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Rydon Homes Limited ("Rydon") to prepare representations on the soundness of the Tunbridge Wells Borough Local Plan Main Modifications ("the Plan"). Please note that this Technical Paper is an update of the document prepared by Neame Sutton in May 2022 and submitted with Rydon's Matter 9 Statement.
- 1.2 This Technical Note focuses specifically on the following matters:
 - The Housing Trajectory that the Council propose in the Plan¹
 - The consequent inability of the Plan to demonstrate a 5-year housing land supply
 - Consideration of the various sources of supply identified by the Council in the Plan
 - Consideration of the robustness of the Plan in terms of demonstrating a 5-year housing land supply in the year following the Plan's adoption
 - Conclusions on the soundness of the Plan in terms of meeting the core Government objective to significantly boost the supply of housing nationally
- 1.3 The Plan has been prepared in the context of the Government policy set out in the National Planning Policy Framework ("the Framework 2021") and in this respect the minimum Local Housing Need ("LHN") figure generated using the Standard Method (April 2023)² is the figure against which the housing trajectory and consequent 5-year housing land supply position is calculated.
- 1.4 This Technical Note has therefore been prepared having regard to the Framework 2021 and corresponding National Planning Practice Guidance ("PPG"). Regard has also been had to the new Framework 2023 (19 December 2023) insofar as it is relevant to the examination of the Plan (bearing in mind the transitional provisions that are in place).

¹ As set out in the Housing Supply and Trajectory Topic Paper – February 2021

² Paragraph 11.5 on Page 50 of 87 of Local Plan Development Strategy Topic Paper – Addendum (January 2024) confirms that this is the approach the Council has taken in preparing the Main Modifications

2.0 Housing Trajectory – draft Policy STR1 and Housing Supply and Trajectory Topic Paper

- 2.1 Draft Policy STR1 as proposed to be modified sets out the minimum housing requirement of 12,006 dwellings, which equates to 667 dpa i.e. the Standard Method calculation of Local Housing Need ("LHN") applicable at April 2023 over the Plan period to 2038.
- 2.2 The Plan's housing trajectory is summarised in the Updated Local Plan Housing Trajectory (Position as at 01 April 2023) (December 2023). The Council's approach to the supply sources that its housing trajectory is reliant upon is explained in the Local Plan Development Strategy Topic Paper – Addendum (January 2024) ("the Topic Paper") and that current 5-year Housing Land Supply Position Statement (base date 01 April 2023).
- 2.3 This Technical Note is based on the evidence contained in the Council's January 2024 Topic Paper and the 5-year Housing Land Supply Position Statement published in October 2023.
- 2.4 The supply sources the Council relies upon in the trajectory for the Plan are summarised in Table 3 of the Topic Paper (Page 52 of 87):
 - 1. Completions 2020 2023
 - 2. Extant Planning Consents as at 01 April 2023
 - 3. Windfall allowance small sites
 - 4. Windfall allowance large urban sites
 - 5. Outstanding Site Allocations (from extant Local Plan)
 - 6. Outstanding Brenenden Neighbourhood Development Plan Site Allocations
 - 7. New Housing Allocations proposed in the Plan
- 2.5 These supply sources are intended only to meet the Local Housing Need figure calculated via the Standard Method for the next 10 years (2023/24 – 2033/34). The Council is not seeking to address any unmet need arising from neighbouring authorities such as Sevenoaks3.
- 2.6 In giving consideration to the Council's supply sources in its housing trajectory it is important to have regard to the requirements of National Policy, namely the Annex 2 definitions of deliverability and developability (as supplemented by the PPG). Most

³ Paragraph 4.21 on Page 47 of the Duty to Cooperate Statement – March 2021 refers

- notably is the requirement, placed on the Council by Government, to provide 'clear evidence' of deliverability for all proposed housing allocation sites relied upon for the first 5-years of the Plan period4.
- 2.7 This test is vitally important if the Council is to be able to demonstrate a robust (and sound) housing delivery trajectory that at least meets the minimum LHN for the identified Plan period. The Plan should also aim to deliver additional housing over the Plan period to act as a buffer in the event that any of the identified supply sources fail to deliver when the Council expects them too. This matter is covered in further detail below.
- 2.8 Turning now to consider each of the supply sources identified by the Council in its housing delivery trajectory.
 - (i) Extant Planning Consents as at 01 April 2023 (Commitments):
- 2.9 The Council seeks to rely on a total of 2,845 no. dwellings from extant consents. The majority of these dwellings are programmed for delivery by the Council within the current 5-years commencing 2023/24 monitoring year.
- 2.10 The first point to note is that at the Regulation 18 consultation stage the Council considered it appropriate to apply a 10% lapse rate to its small-sites commitment rate (schemes of 1-9 dwellings)⁵. No such allowance has been made in the most recent supply assessment and no reason for removing the lapse rate has been given by the Council.
- 2.11 A 10% lapse rate would be a prudent approach to take given the inherent uncertainty with the delivery of small scale consents across the District. This should be reinstated by the Council to demonstrate a robust approach to its supply assessment for the housing delivery trajectory over the Plan period.
- 2.12 The Council does now appear to have given some consideration to its large site commitments and in particular those where only Outline Consents are in place (for 10 or more units). This is in response to the need for 'clear evidence' to be presented that such sites are deliverable within the current 5-year period as required by Annex 2 of the Framework 2021.

⁴ Annex 2 of Framework 2023

⁵ See Paragraph 13, third bullet on Page 4 of 5-year Housing Land Supply 2018/19 – June 2019

- 2.13 The evidence the Council has set out in its Five-Year Housing Land Supply 2023/2024 Position Statement (October 2023)6 is limited. This is the evidence that the updated housing trajectory within the Plan is based.
- 2.14 Notwithstanding this position the trajectory assessment has included all of the supply relied upon by the Council from this source.
 - Outstanding Allocations and New Allocations: (ii)
- 2.15 The Council is seeking to rely on a total of 5,4957 dwellings coming forward across the Plan period from a combination of outstanding unimplemented allocations in the extant Local Plan and New Allocations in the Plan. This supply source comprises the majority of the Council's supply for the Plan period (45.8% of the total supply).
- 2.16 Neame Sutton has undertaken a review of each of the proposed allocation sites in the context of the requirements of the Framework 2021 (particularly Annex 2) and the PPG. The following key points have arisen from that analysis:
 - 2.16.1 **Point 1:** The Council is still reliant upon delivery from a strategic scale allocation at Paddock Wood that is required to provide 2453 dwellings. Whilst the Council has set out the evidence it has relied upon for the projected delivery rates from these sites in the Strategic Sites Topic Paper (March 2021) it has also freely accepted that it has no experience of delivering development of this scale8.
 - 2.16.2 The Council should therefore be taking a cautious approach to the delivery trajectory for this site. It is clear however from the trajectory in the Topic Paper that this is not the case. For example the Council expects the Paddock Wood site to deliver 835 no. dwellings in the current 5-year period. This is simply unrealistic.
 - 2.16.3 A more appropriate delivery trajectory for Paddock Wood is set out in the subsection below that reflects current empirical evidence of delivery from sites of this scale across the country.

⁶ Paragraphs 24 – 32 on Pages 16-19 of the Five-Year Housing Land Supply 2023/2024 Position Statement

⁷ Figure set out in Table 3 on Page 53 of 87 of the Topic Paper (January 2024)

⁸ See Paragraph 4.34 on Page 22 of the Housing Supply and Trajectory Topic Paper – February 2021

- 2.16.4 **Point 2:** The Council is seeking to rely on delivery from a number of proposed allocations within the current 5-year period of the Plan period without presenting any evidence that these sites are capable of delivering completions, let alone 'clear evidence' that completions will take place at the point envisaged. In fact the Five-Year Housing Land Supply 2023/2024 Position Statement only considers delivery from those allocations carried forward from the old Local Plan.
- 2.16.5 In considering those historic allocations and placing some reliance on delivery from them in the first 5-years of the Plan period⁹ the Council is dependent on its own 'estimate' of delivery. This does not amount to 'clear evidence' of delivery. For the remaining sites that the Council is expecting dwelling completions in the first 5-years there does not appear to be any evidence.
- 2.16.6 In Neame Sutton's view all of the supply relied upon from proposed allocations within the first 5-years of the Plan Period should be removed. The effect of this change is set out in the Neame Sutton Trajectory attached at Appendix 1.

Strategic Allocation – Paddock Wood: (iii)

- 2.17 The Council's current housing delivery trajectory is heavily dependent on the one remaining Strategic Allocation, which accounts for 2453 dwellings (45.1% of the allocations proposed within the Plan).
- 2.18 The delivery trajectory set out in the Updated Local Plan Housing Trajectory expects delivery from the allocation in the monitoring year 2025/26 i.e. the first year following the Council's projected adoption of the Plan. Whilst the year 1 delivery is reasonable this rapidly increases to an annual projection of 295 dpa, which is totally unrealistic.
- 2.19 The evidence base that underpins the Plan includes detail on the strategic sites set out in the Strategic Sites Topic Paper (March 2021) and a range of other documents¹⁰. Whilst parts of that original evidence base have been updated and published alongside the Main Modifications Consultation there does not appear to be any update to support the new delivery trajectory for the site.

⁹ See Table 4 on Page 14 of the Five-Year Housing Land Supply 2023/2024 Position Statement

¹⁰ Strategic Sites Master planning and Infrastructure Main Report and Appendices, Infrastructure Delivery Plan, Local Plan Viability Assessment and Appendices and the SA.

- 2.20 Nowhere in the evidence base does the Council provide detail to support its housing delivery trajectory for the site.
- 2.21 In fact the Strategic Sites Topic Paper confirms the 'anticipated' development that 'could' be delivered from the site¹¹. This has not been updated.
- 2.22 Furthermore the Housing Supply and Trajectory Topic Paper confirms that the Council has no prior experience of dealing with sites of this scale and the delivery set out in Table 7 on Page 22 is lacking detail and unclear as to when the Council would expect to see dwelling completions and importantly how many completions.
- On the latter point the Council appears to be relying on evidence from the Letwin 2.23 Review 2018 for evidence of build out rates on sites of 2,000+ dwellings (Table 8 on Page 25 refers). The same table also confirms that any build out evidence from the actual site promoters is 'to be confirmed'.
- 2.24 The Council's application of a delivery rate of 299 dpa taken solely from Letwin is not robust, particularly taking into account the fact that the Council's has not sought to review more up-to-date evidence from Lichfields published in February 2020. This is despite detailed evidence on delivery being presented during the course of the Examination hearing sessions.
- 2.25 Given the lack of specific delivery evidence in relation to the strategic allocation Neame Sutton considers the Council should adopt a trajectory that is reflective of the wider data set provided in the most recent Lichfields evidence published in February 2020 (see Appendix 2).
- 2.26 An updated delivery trajectory for each of the strategic sites is therefore set out below:

Table 1: Paddock Wood Delivery Trajectory:

Realistic Delivery Trajectory for Paddock Wood Strategic Allocation Site									
2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	
0	0	0	0	0	0	0	0	50	
2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	TOTAL
120	120	240	240	240	240	240	240	240	1970

Notes:

1. Predicated on delivery from eastern side first, which is currently unconstrained by Green Belt and based on two outlets at a rate of 60 dpa each. This delivery would be dependent on the submission of an Outline Application for the eastern side by late 2023. The western side of the site will likely follow

 $^{^{\}rm 11}$ Paragraph 4.37 on Page 16 and Paragraph 5.26 on Page 22 refer.

- behind given the constraint of Green Belt and for that reason its delivery start time has been moved back by 1 year.
- 2. The delivery of 295 dpa relied upon by the Council has no basis in evidence. Lichfields confirm in table 5 on Page 11 (see Appendix 2) that no sites within the data set have been able to consistently deliver 295 dpa.
- 3. A more realistic delivery rate of 60 dpa per outlet is considered to represent a robust approach to the delivery trajectory for this site. Therefore based on a total of 4 outlets (Paragraph 4.36 on Page 16 of the Strategic Sites Topic Paper) the site should be able to deliver a maximum of 240 dpa.

$(i\vee)$ Windfalls:

- 2.27 The Council places relatively heavy reliance upon windfalls to help meeting the minimum local housing need for the Plan period. A total of 1824 no. dwellings¹² are relied upon at a rate of 152 dpa from 2026/27 through until the end of the Plan period¹³.
- 2.28 Whilst the evidence for a windfall provision is set out in the Topic Paper, it is important to note the following points:
 - 2.28.1 **Point 1:** The Council's evidence in the Topic Paper is based primarily on historic trend data. In a Borough that is constrained by Green Belt and, in the absence of an up-to-date Local Plan, the historic trend data is likely to contain higher windfall rates than will prevail in the future.
 - 2.28.2 Point 2: The Council seeks to rely on 456 dwellings from windfalls in the current 5-year period yet no compelling evidence has been presented as required by Paragraph 71 of the Framework 2021 to demonstrate that this is a reliable source for delivery in the current 5-years. This is a notable increase from the position advanced by the Council at the start of the Examination, which sought to rely upon only 244 dwellings from this source in the current 5-year period. This component of supply should be removed.
 - 2.28.3 Point 3: Given that even the Council had previously conceded the windfall allowance woult reduce to 102 dpa, Neame Sutton considers that should be the maximum level relied upon in the trajectory (as set out in our Matter 9 Statement). There is even a case for going lower than this given the stance taken by the Council at the Regulation 18 consultation stage i.e. 50 dpa.
 - 2.28.4 Point 4: Since the start of the Examination process the planning world has changed placing even more emphasis on the need for the Council to

¹² This is increased substantially from 700 no. dwellings at the Regulation 18 consultation stage and also from the start of the Examination.

¹³ This is increased from 50dpa at the Regulation 18 consultation stage and 20 dpa from the start of the Examination.

demonstrate evidence of forward trend analysis, which it has not done. By way of example the following matters are all new and have not been considered by the Council:

- 1. Major overhaul to the planning system New Framework as foretold by Michael Gove in his WMS 06 December 2022 - New Levelling Up and Regeneration Act enacted on 26 October 2023
- 2. General election due between May Autumn 2024 as announced by Prime Minister in first week of January 2024
- 3. Speculative applications by small/medium sized developers in a time of uncertainty may well be viewed as too high risk
- 4. Economic climate in period of sustained uncertainty. Highest interest rates in 15 years
- 5. Inflation hit 10.7% in November 2022 and 4.6% in October 2023. Massively above the less than 1% position in 2021. Last time rates were at 4.6% was 2011
- 6. Bank of England base rate is at 5.25% compared with 0.1% in 2021
- 7. Cost of borrowing has hit historic high levels
- 8. Consequence of this is a slow down in the market
- 9. Latest statistical release from Homes England (27 June 2023) confirms starts are down by 5.6% when compared with the same period for the previous year
- 10. The general election is likely to maintain the period of uncertainty as has historically been the case
- Summary of Changes to Council's Supply Sources: (v)
- 2.29 As a result of the above headline points the effect on the Council's supply sources is summarised in the table below:

Table 3: Summary of Amendments Made to Council's Supply Sources:

Supply Source	Council	Neame Sutton	Difference
Completions 2020 - 2023	1,842	1,842	0
Extant Planning Permissions	2,845	2,845	0
Windfall Allowance	1,824	918	-908*
Proposed Allocations	4,422	3,939	-483**
TOTAL	10,933	9,544	-1,389

^{*}Removal of windfalls from first 5-year period and reduction to 102 dpa for remaining period

^{**}Adjustments to delivery trajectory to reflect Annex 2 in relation to first 5-year period. Adjustments to Paddock Wood to reflect realistic delivery trajectory

2.30 The detailed effects of the above amendments on the Council's housing trajectory is demonstrated in Tables 1 and 2 attached at Appendix 1 of this Note.

3.0 **5-Year Housing Land Supply**

3.1 The Council's housing trajectory set out in the Updated Local Plan Housing Trajectory does not provide a rolling 5-year supply calculation so it is not possible to ascertain whether the Plan will deliver and maintain a 5-year supply as required by the Framework 2021.

Static 5-Year Housing Land Supply as at 01 April 2023:

- 3.2 The only 5-year supply calculation provided by the Council is set out in Five-Year Housing Supply 2023/24 Position Statement. That document confirms that the Council cannot currently demonstrate a 5-year housing land supply. Paragraph 42 on Page 23 confirms the Council's position at 4.29 years.
- 3.3 It is therefore clear that the Council cannot currently demonstrate a 5-year housing land supply. This is a significant concern that must be resolved by the Plan if it is to be found Sound.

Rolling 5-Year Housing Land Supply across the Plan period:

- 3.4 Neame Sutton's Table 1 in Appendix 1 of this Note provides a rolling 5-year supply calculation based on the Council's own data and appears to confirm a relatively healthy positive position, which does not reflect the Five-Year Housing Supply 2023/24 Position Statement¹⁴. This is because the Council's housing trajectory for the Plan period includes allocations within the first 5-year period that do not meet the Annex 2 test of deliverability.
- 3.5 However, when the adjustments are made to the Council's supply sources as set out in Section 2 of this note the supply position alters dramatically and is more reflective of the latest 5-year supply position set out by the Council.
- 3.6 Table 2 in Appendix 1 sets out the rolling 5-year housing supply position with the supply sources amended and confirms that at no point during the remainder of the Plan period will the Plan deliver a positive 5-year supply position.
- 3.7 It is important to note that this position will persist even if one was not to apply all of the adjustments set out in Section 2 of this Note.

¹⁴ This is reflective of the position presented by the Council at the start of the Examination i.e. a trajectory that is more positive than the Council's own evidence of 5-year Housing Land Supply

3.8 The proposed Modifications to the Plan therefore fails the key Soundness test of planning positively and is not in accordance with National policy to help significantly boost the supply of housing.

4.0 Conclusions on Soundness of Plan

- 4.1 On the basis of the assessment undertaken in this updated Technical Note it is apparent that the housing trajectory proposed for the Plan (as proposed to be modified) will not deliver a rolling 5-year supply of deliverable housing sites and as a consequence the Plan is unsound as currently drafted.
- 4.2 The Council has placed too much reliance on its remaining strategic allocation (45% of all the allocations proposed in the Plan), which will take a considerable period of time to deliver and currently the evidence base on the delivery trajectory for the site is insufficient and uncertain. Other sites are relied upon within the first 5-years of the Plan period without any 'clear evidence' of delivery and the Council places reliance on a significant amount of delivery from unidentified windfall sites (nearly 17% of the total supply). Furthermore the current proposal by the Council is to plan for insufficient housing to deliver a 15 year strategy. This evidence demonstrates that the Plan even fails to meet the reduced objective of a 10 year strategy.
- 4.3 All of the above points and the detailed evidence contained in the earlier sections of this Technical Note have been predicated on the Council's proposed updated LHN of 667 dpa. In other words the evidence in this Technical Note has demonstrated the housing delivery strategy set out in the Plan is unsound and further allocations are required. This is before the Inspector reaches a conclusion on the matter of any uplifts to the LHN
- 4.4 As set out in Neame Sutton's Matter 2 Statement on behalf of Rydon (Section 2) there is clear evidence to support an uplift to the LHN particularly to address unmet need arising from Sevenoaks. As a starting point the uncapped Standard Method figure of 749 dpa should be used in the Plan. This would deliver a further 820 dwellings over the reduced 10 year Plan period proposed by the Council still making a meaningful contribution to the unmet need arising from Sevenoaks.
- 4.5 Clearly if the minimum housing requirement is set at 749 dpa or 13,482 dwellings this would further increase the number of dwellings that would need to be provided through new allocations.
- 4.6 The solution for the Council is a simple one. Further site allocations are required to ensure adequate delivery of the right sites at the right time to ensure a robust housing delivery trajectory and consequently a positive rolling 5-year supply position.

- 4.7 The available evidence base clearly demonstrates that there is sufficient supply within the Borough to properly plan for the needs of the Borough's residents and to help address the unmet need arising from Sevenoaks.
- 4.8 The Council must therefore take action now to address the shortfall, which is a fundamental failure in terms of the Soundness of the Plan as currently drafted.

Appendix 1

Housing Trajectories:

- Table 1 Based on Standard Method and Council's Supply Sources (LPA Position)
- Table 2 Based on Standard Method and Neame Sutton assessment of Council's Supply Sources (Neame Sutton Position)
- Table 3 Based on Standard Method Uncapped and Neame Sutton assessment of Council's Supply Sources

Tunbridge Wells Borough Local Plan - Examination

Housing Trajectory - COUNCIL POSITION - 667dpa - Sedgefield and 5% Buffer

Table 1

As at: 09/02/2024

Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
Supply Sources	-		•				, <u>'</u>												
Proposed Local Plan Allocations	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	2034/35	2035/36	2036/37	2037/38	TOTAL
STR/RTW 2 The Strategy for Royal Tunbridge Wells Town Centre	0	0	0	0	0	0	0	0	0	20	40	40	40	35	0	0	0	0	175
AL/RTW 1 Former cinema site, Mount Pleasant Road AL/RTW 2 Land at the Auction House, Linden Park Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 3 Land at Lifestyle Ford, Mount Ephraim/Culverden Street	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	100
AL/RTW 4 Land at 36-46 St Johns Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 5 Land to the south of Speldhurst Road and west of Reynolds AL/RTW 6 Land at 202 and 230 Upper Grosvenor Road	0	0	0	0	0	0	0	0	0	0	0	70 0	30	0	0	0	0	0	100 0
AL/RTW 7 Land at former Gas Works, Sandhurst Road	0	0	0	0	0	0	0	70	70	45	0	0	0	0	0	0	0	0	185
AL/RTW 8 TN2 Centre and adjacent land, Greggs Wood Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 9 Land at Beechwood Sacred Heart School	0	0	0	0	0	0	0	0	0	69	0	0	0	0	0	0	0	0	69
AL/RTW 9 CI C2 Discount to Land at Beechwood Sacred Heart School AL/RTW 10 Montacute Gardens	0	0	0	0	0	0	0	0	0	-33 0	0 21	0	0	0	0	0	0	0	-33 21
AL/RTW 11 Fomer Plant & Tool Hire, Eridge Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 12 Land at Tunbridge Wells Telephone Engineering Centre	0	0	0	0	0	0	0	0	0	50	0	0	0	0	0	0	0	0	50
AL/RTW 13 Turners Pie Factory, Broadwater Lane AL/RTW 14 Land at Wyevale Garden Centre, Eridge Road	0	0	0	0	0	0	70 0	24 0	0 28	0	0	0	0	0	0	0	0	0	94 28
AL/RTW 15 Land at Showfields Road and Rowan Tree Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 16 Land to west of Eridge Road at Spratsbrook Farm	0	0	0	0	0	0	0	0	60	60	0	0	0	0	0	0	0	0	120
AL/RTW 17 Land adjacent to Lonfield Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 18 Land at the former North Farm landfill AL/RTW 19 Land to the north of Hawkenbury Rec Ground	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RTW 20 Land at Culverden Stadium, Culverden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	30
AL/RTW 21 Land at Colebrook Sports Field, Liptraps Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44	36	80
AL/RTW 22 Land at Bayham Sports Field West AL/SO 1 Speldhurst Road former allotments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23 0	23 0
AL/SO 2 Land at Mabledon House	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/SO 3 Land at Baldwins Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
STR/SS 1 The Strategy for Paddock Wood and East Capel	0	0	0	0	0	50 0	206 0	285 0	290	295	295	295 1	295	275 0	103 0	30 0	34 0	0	2453 16
STR/SS 2 The Strategy for Paddock Wood Town Centre STR/SS 3 The Strategy for Tudeley Village	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/PW 1 Land at Mascalls Farm	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 1 Land at Brick Kiln Farm, Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 2 Land south of Corn Hall, Crane Valley, Cranbrook AL/CRS 3 Tunden Farm, Hartley Road, Cranbrook	0	0	0	0	0	0	0 70	0 70	0 26	0	0	0	0	40 0	0	0	0	0	40 166
AL/CRS 4 Cranbrook School	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 5 Sissinghurst Castle Garden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 6 Land south of The Street, Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/CRS 7 Land at corner of Frittenden Road and Common Road AL/HA 1 Land at the White House, Highgate Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 2 Brook House, Cranbrook Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 3 Former site of Springfield Nurseries	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 4 Land off Copthall Avenue and Highgate Hill AL/HA 5 Land to the north of Birchfield Grove	0	0	0	0	0	0	0 35	0 35	0	0	0	0	0	0	0	0	0	0	0 70
AL/HA 6 Sports Pavilion, King George V Playing Fields, The Moor	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 7 Hawkhurst Station Business Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HA 8 Site at Limes Grove	0	0	0	0	0	0	0	0	19	0	0	0	0	0	0	0	0	0	0
AL/BE 1 Land adjacent to New Pond Road, Benenden AL/BE 2 Feoffee Cottages and land, Walkhurst Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19 0
AL/BE 3 Land at Brenenden Hospital, East End (south)	0	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	0	25
AL/BE 4 Land at Brenenden Hospital, East End (north)	0	0	0	0	0	0	0	0	24	0	0	0	0	0	0	0	0	0	24
AL/BM 1 Land between Brenchley Road, Coppers Lane AL/BM 2 Land at Maidstone Road	0	0	0	0	0	0	0 15	0	0	0	0	0	0	0	0	0	0	0	0 15
AL/FR 1 Land at Cranbrook Road, Frittenden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/GO 1 Land east of Balcombes Hill and adj to Tiddymotts Ln	0	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0	0	0	14
AL/GO 2 Land at Triggs Farm, Cranbrook Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/HO 1 Land adjacent to Furnace Lane and Gibbet Lane AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive	0	0	0	0	0	0	0 44	0 24	0	0	0	0	0	0	0	0	0	0	68
AL/HO 3 Land to the east of Horsmonden	0	0	0	0	0	0	50	70	0	0	0	0	0	0	0	0	0	0	120
AL/LA 1 Land to the west of Spray Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/PE 1 Land rear of High Street and west of Chalket Lane AL/PE 2 Land at Hubbles Farm and south of Hastings Road	0	0	0	0	0	0	0	0 44	0 36	0	44 0	11 0	0	0	0	0	0	0	55 80
AL/PE 3 Land north of the A21, south and west of Hastings Road	0	0	0	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	80
AL/PE 4 Land at Downingbury Farm, Maidstone Road	0	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	0	25
AL/PE 5 Land at Sturgeons fronting Henwood Green Road	0	0	0	0	0	0 0	0	0	0	0	0	0	70	0 30	0	0	0	0	0 100
AL/PE 6 Woodsgate Corner AL/PE 6 C2 C2 Discount to Woodsgate Corner	0	0	0	0	0	0	0	0	0	0	0	0	70 -20	-9	0	0	0	0	100 -29
AL/PE 7 Cornford Court, Cornford Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/PE 7 C2 C2 Discount to Cornford Court	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/PE 8 Owlsnest Wood, Tonbridge Road AL/PE 8 C2 C2 Discount to Owlsnest Wood	0	0	0	0	0	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/RU 1 Lifestyle Motor Europe, Langton Road	0	0	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	15
AL/SA 1 Land on the south side of Sayvlle, Rye Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AL/SA 2 Sharps Hill Farm, Queen Street AL/SP 1 Land to the West of Langton Road andd south of Ferbies	0	0	0	0	0	0 0	0	13 11	0	0	0	0	0	0	0	0	0	0	13 11
AL/SP 2 Land to the West of Langton Road and a south of Ferbles AL/SP 2 Land at and adjacent to Rusthall Recreation Ground	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total from Extant Permissions (01 April 2020)																			
Completions 2020 - 2023 and Extant Permissions (01 April 2023) Windfalls	688	518	636	842	736	708	393	0	166	0	0	0	0	0	0	0	0	0	4687
Windfall							152	152	152	152	152	152	152	152	152	152	152	152	1824
TOTAL SUPPLY	688	518	636	842	736	758	1049	798	926	707	663	614	567	523	255	182	230	241	10933
Requirement	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	12006
Annual Shortfall/Surplus	21	-149	-31	175	69	91	382	131	259	40	-4	-53	-100	-144	-412	-485	-437	-426	
Cumulative Shortfall/Surplus	0	21	-128	-159	16	85	176	558	689	948	988	984	931	831	687	275	-210	-647	
Base 5 Year Requirement Shortfall/oversupply (Sedgefield)	3335 0.0	3335 21.0	3335 -128.0	3335 - 159 .0	3335 16.0	3335 85.0	3335 176.0	3335 558.0	3335 689.0	3335 948.0	3335 988.0	3335 984.0	3335 931.0	3335 831.0					
5 Year Requirement with Shortfall/oversupply	3335.0	3314.0	3463.0	3494.0	3319.0	3250.0	3159.0	2777.0	2646.0	2387.0	2347.0	2351.0	2404.0	2504.0					
Adjuste 5 Year Requirement with 5% Buffer	3501.8	3479.7	3636.2	3668.7	3485.0	3412.5	3317.0	2915.9	2778.3	2506.4	2464.4	2468.6	2524.2	2629.2					
Adjusted Annual Requirement (5yr) 5 Year Supply	700.4 3420	695.9 3490	727.2 4021	733.7 4183	697.0 4267	682.5 4238	663.4 4143	583.2 3708	555.7 3477	501.3 3074	492.9 2622	493.7 2141	504.8 1757	525.8 1431					
Supply in Years	4,88	5.01	5.53	5.70	6.12	6.21	6.25	6.36	6.26	6.13	5.32	4.34	3.48	2.72					

Notes:

1. Applies 667 dpa Local Plan Development Strategy Topic Paper Addendum - January 2024

2. Sedgefield and 5% Buffer on the basis that the Plan is still to be examined under the Framework 2021 (see Paragraph 230 of the Framework 2023)

3. Council's supply sources as set out in Local Plan Development Strategy Topic Paper Addendum and Updated Local Plan Housing Trajectory

Tunbridge Wells Borough Local Plan - Examination

Housing Trajectory - NEAME SUTTON POSITION - 667dpa - Sedgefield and 5% Buffer

Table 2

		-																			
Cb. C	Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18		
Supply Source	S	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26 2	026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36 20	36/37	2037/38	TOTAL	NOTES
	l Plan Allocations																				
	The Strategy for Royal Tunbridge Wells Town Centre Former cinema site, Mount Pleasant Road	0	0	0	0	0	0	0	0	0	20	40 0	40 0	40 0	35 0	0	0	0	0	175 0	
AL/RTW 2	Land at the Auction House, Linden Park Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	100	
AL/RTW 4	Land at 36-46 St Johns Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 5 AL/RTW 6	Land to the south of Speldhurst Road and west of Reynolds Land at 202 and 230 Upper Grosvenor Road	0	0	0	0	0	0	0	0	0	0	0	70 0	30	0	0	0	0	0	100	
AL/RTW 7	Land at former Gas Works, Sandhurst Road	0	0	0	0	0	0	0	0	0	70	70	45	0	0	0	0	0	0	185	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/RTW 8	TN2 Centre and adjacent land, Greggs Wood Road	0	0	0	0	0	ō	0	0	o	0	0	0	0	0	0	0	0	0	0	Hot fillion 2 compliant in terms of clear Evidence for metasion in first 5 years
AL/RTW 9	Land at Beechwood Sacred Heart School	0	0	0	0	0	0	0	0	0	69	0	0	0	0	0	0	0	0	69	
AL/RTW 9 C2 AL/RTW 10	C2 Discount to Land at Beechwood Sacred Heart School Montacute Gardens	0	0	0	0	0	0	0	0	0	-33	0 21	0	0	0	0	0	0	0	-33 21	
AL/RTW 10		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 12	Land at Tunbridge Wells Telephone Engineering Centre	0	0	0	0	0	0	0	0	0	50	0	0	0	0	0	0	0	0	50	
	Turners Pie Factory, Broadwater Lane	0	0	0	0	0	0	0	0	0	70	24	0	0	0	0	0	0	0	94	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/RTW 14	Land at Wyevale Garden Centre, Eridge Road	0	0	0	0	0	0	0	0	0	28	0	0	0	0	0	0	0	0	28	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/RTW 15 AL/RTW 16	Land at Showfields Road and Rowan Tree Road Land to west of Eridge Road at Spratsbrook Farm	0	0	0	0	0	0	0	0	0	60	60	0	0	0	0	0	0	0	0 120	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/RTW 17		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Not Affilex 2 compliant in terms of clear evidence for inclusion in first 5 years
AL/RTW 18		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Land to the north of Hawkenbury Rec Ground	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 20	Land at Culverden Stadium, Culverden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	30	
AL/RTW 21 AL/RTW 22	Land at Colebrook Sports Field, Liptraps Lane Land at Bayham Sports Field West	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3b 23	80 23	
AL/SO 1	Speldhurst Road former allotments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/SO 2	Land at Mabledon House	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/SO 3	Land at Baldwins Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
																					Delivery from eastern side that is outside of the GB based on two outles (120 dpa)
STR/SS 1	The Strategy for Paddock Wood and East Capel	0	0	0	n	0		0	0	50	120	120	240	240	240	240	240	240	240	1970	from 2029/30 with initial delivery in 2028/29. Move back completions from western side that is in GB to 2031/32 (120 dpa from two outlets) - Max delivery 240 dpa.
STR/SS 2	The Strategy for Paddock Wood Town Centre	0	0	0	0	0	0	0	0	0	0	0	5	5	5	1	0	0	0	16	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
STR/SS 3	The Strategy for Tudeley Village	0	0	0	0	0	o	0	0	0	0	0	0	0	0	0	0	0	0	0	REMOVED BY COUNCIL
AL/PW 1	Land at Mascalls Farm	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 1	Land at Brick Kiln Farm, Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	0	0	0	0	0	0	U	0	0	0	0	0	0	40	U	U	U	U	40	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years. Note
																					that on 12 April 2021 the application on this site has been called in by the SoS for
AL/CRS 3	Tunden Farm, Hartley Road, Cranbrook	0	0	0	0	0	0	0	0	0	70	70	26	0	0	0	0	0	0	166	determination.
AL/CRS 4	Cranbrook School	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 5	Sissinghurst Castle Garden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 6 AL/CRS 7	Land south of The Street, Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 1	Land at corner of Frittenden Road and Common Road Land at the White House, Highgate Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 2	Brook House, Cranbrook Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 3	Former site of Springfield Nurseries	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 4	Land off Copthall Avenue and Highgate Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 5 AL/HA 6	Land to the north of Birchfield Grove Sports Pavilion, King George V Playing Fields, The Moor	0	0	0	0	0	0	0	0	0	0	35	35 0	0	0	0	0	0	0	70 0	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/HA 7	Hawkhurst Station Business Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 8	Site at Limes Grove	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BE 1	Land adjacent to New Pond Road, Benenden	0	0	0	0	0	0	0	0	0	19	0	0	0	0	0	0	0	0	19	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/BE 2	Feoffee Cottages and land, Walkhurst Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BE 3	Land at Brenenden Hospital, East End (south)	0	0	0	0	0	0	0	0	0	25 24	0	0	0	0	0	0	0	0	25	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/BE 4 AL/BM 1	Land at Brenenden Hospital, East End (north) Land between Brenchley Road, Coppers Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/BM 2	Land at Maidstone Road	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	0	0	15	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/FR 1	Land at Cranbrook Road, Frittenden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/GO 1	Land east of Balcombes Hill and adj to Tiddymotts Ln	0	0	0	0	0	0	0	0	0	14	0	0	0	0	0	0	0	0	14	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/GO 2	Land at Triggs Farm, Cranbrook Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HO 1 AL/HO 2	Land adjacent to Furnace Lane and Gibbet Lane Land south of Brenchley Road and west of Fromandez Drive	0	0	0	0	0	0	0	0	0	0 44	0 24	0	0	0	0	0	0	0	0 68	Net Access 3 consideration toward of Class Crideran for inclusion in first Consess
AL/HO 3	Land to the east of Horsmonden	0	0	0	0	0	0	0	0	0	50	70	0	0	0	0	0	0	0	120	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/LA 1	Land to the west of Spray Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Hot fames 2 complaint in terms of clear Endence for inclusion in first 3 years
AL/PE 1	Land rear of High Street and west of Chalket Lane	0	0	0	0	0	0	0	0	0	0	44	11	0	0	0	0	0	0	55	
AL/PE 2	Land at Hubbles Farm and south of Hastings Road	0	0	0	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	80	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/PE 3	Land north of the A21, south and west of Hastings Road	0	0	0	0	0	0	0	0	0	44	36	0	0	0	0	0	0	0	80	Not have 2 complication to the Company of Classics and Cl
AL/PE 4 AL/PE 5	Land at Downingbury Farm, Maidstone Road Land at Sturgeons fronting Henwood Green Road	0	0	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	25	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/PE 6	Woodsgate Corner	0	0	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	100	
AL/PE 6 C2	C2 Discount to Woodsgate Corner	0	0	0	0	0	0	0	0	0	0	0	0	-20	-9	0	0	0	0	-29	
AL/PE 7	Cornford Court, Cornford Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 7 C2	C2 Discount to Cornford Court	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 8 C2	Owlsnest Wood, Tonbridge Road C2 Discount to Owlsnest Wood	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RU 1	Lifestyle Motor Europe, Langton Road	0	0	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	15	
AL/SA 1	Land on the south side of Sayvlle, Rye Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/SA 2	Sharps Hill Farm, Queen Street	0	0	0	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	13	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/SP 1	Land to the West of Langton Road andd south of Ferbies	0	0	0	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	11	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/SP 2	Land at and adjacent to Rusthall Recreation Ground tant Permissions (01 April 2020)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	2020 - 2023 and Extant Permissions (01 April 2023)	688	518	636	842	736	708	393	0	166	0	0	0	0	0	0	0	0	0	4687	
Windfalls																					
																					Remove Windfall from first 5-years as no compelling evidence for their inclusion.
																					Also reduce delivery down to 102 dpa to reflect a more robust approach in the
Windfall											102	102	102	102	102	102	102	102	102	918	trajectory i.e. 78 dpa for small sites rather than 98 dpa as proposed by the Council for first 7 years of Plan period.
TOTAL SUPPL	Υ	688	518	636	842	736	708	393	0	216	954	822	619	467	443	343	342	386	431	9544	
Requirement	all /Complete	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	667	12006	
Annual Shortf	all/Surplus nortfall/Surplus	21	- 149 21	-31 -128	175 -159	69 16	41 85	-274 126	-667 -148	-451 -815	287 -1266	155 -979	-48 -824	- 200 -872	-224 -1072	-324 -1296	-325 -1620	-281 -1945	-236 -2226		
Base 5 Year R		3335	3335	-128 3335	3335	3335	3335	3335	-148 3335	-815 3335	3335	3335	-824 3335	3335	3335	-1290	-1020	-1242	-2220		
Shortfall/over	supply (Sedgefield)	0.0	21.0	-128.0		16.0	85.0	126.0	-148.0	-815.0	-1266.0	-979.0	-824.0	-872.0	-1072.0						
5 Year Requir	ement with Shortfall/oversupply	3335.0	3314.0	3463.0	3494.0	3319.0	3250.0	3209.0	3483.0	4150.0	4601.0	4314.0	4159.0	4207.0	4407.0						
Adjuste 5 Yea	r Requirement with 5% Buffer	3501.8	3479.7	3636.2		3485.0		3369.5	3657.2	4357.5	4831.1	4529.7	4367.0	4417.4	4627.4						
	ual Requirement (5yr)	700.4	695.9 3440	727.2		697.0		673.9 2385	731.4	871.5	966.2	905.9	873.4	883.5	925.5						
5 Year Supply Supply in Yea		3420 4.88	3440 4.94	3315 4.56	2679 3.65	2053 2.95	2271 3,33	3,54	2611 3.57	3078 3,53	3305 3.42	2694 2.97	2214 2.53	1981 2,24	1945 2.10						

- Notes:

 1. Applies 667 dpa Local Plan Development Strategy Topic Paper Addendum January 2024

 2. Sedgefield and 5% Buffer on the basis that the Plan is still to be examined under the Framework 2021 (see Paragraph 230 of the Framework 2023)

 3. Council's supply sources as set out in Local Plan Development Strategy Topic Paper Addendum and Updated Local Plan Housing Trajectory

 4. Adjustments made to Windfalls to Reflect Compelling Evidence Test

 5. Adjustments made to allocations to Reflect Annex 2 test in context of first 5-year period

 6. Adjustments made to Paddock Wood to reflect realistic delivery trajecotries

Housing Trajectory - NEAME SUTTON POSITION - 749dpa - Sedgefield and 5% Buffer

Table 3

Plan Period	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18		
Supply Sources	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 2	2034/35 2	:035/36 2	036/37 2	037/38	TOTAL	NOTES
Proposed Local Plan Allocations STR/RTW 2 The Strategy for Royal Tunbridge Wells Town Centre	0	0	0	0	0	0	0	0	0	20	40	40	40	35	0	0	0	0	175	
AL/RTW 1 Former cinema site, Mount Pleasant Road AL/RTW 2 Land at the Auction House, Linden Park Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 3 Land at Lifestyle Ford, Mount Ephraim/Culverden Street	0	0	0	0	0	0	0	0	0	0	70	30	0	0	0	0	0	0	100	
AL/RTW 4 Land at 36-46 St Johns Road AL/RTW 5 Land to the south of Speldhurst Road and west of Reynolds	0	0	0	0	0	0	0	0	0	0	0	0 70	30	0	0	0	0	0	100	
AL/RTW 6 Land at 202 and 230 Upper Grosvenor Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 7 Land at former Gas Works, Sandhurst Road	0	0	0	0	0	0	0	0	0	70	70	45	0	0	0	0	0	0	185	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/RTW 8 TN2 Centre and adjacent land, Greggs Wood Road AL/RTW 9 Land at Beechwood Sacred Heart School	0	0	0	0	0	0	0	0	0	69	0	0	0	0	0	0	0	0	0 69	
AL/RTW 9 C2 C2 Discount to Land at Beechwood Sacred Heart School	0	0	0	0	0	0	0	0	0	-33	0	0	0	0	0	0	0	0	-33	
AL/RTW 10 Montacute Gardens	0	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0	21	
AL/RTW 11 Fomer Plant & Tool Hire, Eridge Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 12 Land at Tunbridge Wells Telephone Engineering Centre	0	0	0	0	0	0	0	0	0	50 70	24	0	0	0	0	0	0	0	50	Not Appen 2 compliant in terms of Class Suidense for indusion in first 5 years
AL/RTW 13 Turners Pie Factory, Broadwater Lane	U	U	U	U	U	U	U	U	U	70	24	0	U	U	U	0	U	U	94	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/RTW 14 Land at Wyevale Garden Centre, Eridge Road AL/RTW 15 Land at Showfields Road and Rowan Tree Road	0	0	0	0	0	0	0	0	0	28 0	0	0	0	0	0	0	0	0	28	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
	U	U	U	U	U	U	U	U	U	0		U	U	U	U	U	U	U		
AL/RTW 16 Land to west of Eridge Road at Spratsbrook Farm AL/RTW 17 Land adjacent to Lonfield Road	0	0	0	0	0	0	0	0	0	60	60 0	0	0	0	0	0	0	0	120 0	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/RTW 18 Land at the former North Farm landfill	0	0	0	0	ō	0	0	ō	0	0	0	0	0	0	0	0	0	0	0	
AL/RTW 19 Land to the north of Hawkenbury Rec Ground AL/RTW 20 Land at Culverden Stadium, Culverden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 30	0 30	
AL/RTW 21 Land at Colebrook Sports Field, Liptraps Lane AL/RTW 22 Land at Bayham Sports Field West	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44	36 23	80 23	
AL/SO 1 Speldhurst Road former allotments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/SO 2 Land at Mabledon House AL/SO 3 Land at Baldwins Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AC/50 5 Land at Baldwins Lane	U	U	U	0	U	0	U	- 0	U	U	U	U	U	U	0	U	U	U	U	dpa) from 2029/30 with initial delivery in 2028/29. Move back completions
STR/SS 1 The Strategy for Paddock Wood and East Capel	0		0	0	0	0	0	0	50	170	120	240	240	240	240	240	240	240	1970	from western side that is in GB to 2031/32 (120 dpa from two outlets) - Ma delivery 240 dpa.
	0	0	0		0	0	0	0	50	120	120	240	240	240	240	240	240	240		
STR/SS 2 The Strategy for Paddock Wood Town Centre	0	0	0	0	0	0	0	0	0	0	0	5	5	5	1	0	0	0	16	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
STR/SS 3 The Strategy for Tudeley Village AL/PW 1 Land at Mascalls Farm	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	REMOVED BY COUNCIL
AL/CRS 1 Land at Brick Kiln Farm, Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 2 Land south of Corn Hall, Crane Valley, Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	40	0	0	0	0	40	
																				Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 years
AL/CRS 3 Tunden Farm, Hartley Road, Cranbrook	0	0	0	0	0	0	0	0	0	70	70	26	0	0	0	0	0	0	166	Note that on 12 April 2021 the application on this site has been called in by t SoS for determination.
AL/CRS 4 Cranbrook School AL/CRS 5 Sissinghurst Castle Garden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 6 Land south of The Street, Sissinghurst	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/CRS 7 Land at corner of Frittenden Road and Common Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 1 Land at the White House, Highgate Hill AL/HA 2 Brook House, Cranbrook Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 3 Former site of Springfield Nurseries	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 4 Land off Copthall Avenue and Highgate Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HA 5 Land to the north of Birchfield Grove	0	0	0	0	0	0	0	0	0	0	35	35	0	0	0	0	0	0	70	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/HA 6 Sports Pavilion, King George V Playing Fields, The Moor	0	0	0	0	0	ō	ō	ō	ō	0	0	0	0	0	0	0	0	0	0	The state of the s
AL/HA 7 Hawkhurst Station Business Park AL/HA 8 Site at Limes Grove	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BE 1 Land adjacent to New Pond Road, Benenden	0	0	0	0	0	0	0	0	0	19	0	0	0	0	0	0	0	0	19	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/BE 2 Feoffee Cottages and land, Walkhurst Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BE 3 Land at Brenenden Hospital, East End (south)	0	0	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	25	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/BE 4 Land at Brenenden Hospital, East End (north)	0	0	0	0	0	0	0	0	0	24	0	0	0	0	0	0	0	0	24	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/BM 1 Land between Brenchley Road, Coppers Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/BM 2 Land at Maidstone Road	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	0	0	15	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/FR 1 Land at Cranbrook Road, Frittenden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/GO 1 Land east of Balcombes Hill and adi to Tiddymotts Ln	0	0	0	0	0	0	0	0	0	14	0	0	0	0	0	0	0	0	14	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/GO 2 Land at Triggs Farm, Cranbrook Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HO 1 Land adjacent to Furnace Lane and Gibbet Lane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive	0	0	0	0	0	0	0	0	0	44	24	0	0	0	0	0	0	0	68	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
	U	Ü	0	0	Ü	· ·	Ü	Ü						Ü	0	0	0	· ·	00	
AL/HO 3 Land to the east of Horsmonden	0	0	0	0	0	0	0	0	0	50	70	0	0	0	0	0	0	0	120	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/LA 1 Land to the west of Spray Hill AL/PE 1 Land rear of High Street and west of Chalket Lane	0	0	0	0	0	0	0	0	0	0	0 44	11	0	0	0	0	0	0	0 55	
	0	0				0		0	0	44	36		0	0	0	C	C	0	00	Not Appeal 2 complication to the second Class Co.
AL/PE 2 Land at Hubbles Farm and south of Hastings Road AL/PE 3 Land north of the A21, south and west of Hastings Road	0	0	0	0	0	0	0	0	0	44	36 36	0	0	0	0	0	0	0	80 80	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/PE 4 Land at Downingbury Farm, Maidstone Road	0	0	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	25	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/PE 5 Land at Sturgeons fronting Henwood Green Road AL/PE 6 Woodsgate Corner	0	0	0	0	0	0	0	0	0	0	0	0	0 70	0 30	0	0	0	0	0 100	
AL/PE 6 C2 C2 Discount to Woodsgate Corner	0	0	0	0	0	0	0	0	0	0	0	0	-20	-9	0	0	0	0	-29	
AL/PE 7 Cornford Court, Cornford Lane AL/PE 7 C2 C2 Discount to Cornford Court	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 8 Owlsnest Wood, Tonbridge Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/PE 8 C2 C2 Discount to Owlsnest Wood	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
AL/RU 1 Lifestyle Motor Europe, Langton Road	0	0	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	15	
AL/SA 1 Land on the south side of Sayvlle, Rye Road	0	0	0	0	0	0	0	0	0	0	0	0	U	0	0	0	0	0	0	Not Assert 2 constitution of the constitution
AL/SA 2 Sharps Hill Farm, Queen Street	0	0	0	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	13	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
AL/SP 1 Land to the West of Langton Road and south of Ferbies AL/SP 2 Land at and adjacent to Rusthall Recreation Ground	0	0	0	0	0	0	0	0	0	11 0	0	0	0	0	0	0	0	0	11 0	Not Annex 2 compliant in terms of Clear Evidence for inclusion in first 5 year
Total from Extant Permissions (01 April 2020)																				
Completions 2020 - 2022 and Estant Personal Co. April 2022	600	540	626	042	776	700	202	0	100	0	0	0	C	0	0	0	0	0	AC 9.7	
Completions 2020 - 2023 and Extant Permissions (01 April 2023) Windfalls	688	518	636	842	736	708	393	0	166	0	0	0	0	0	0	0	U	0	4687	
																				Remove Windfall from first 5-years as no compelling evidence for their
																				inclusion. Also reduce delivery down to 102 dpa to reflect a more robust approach in the trajectory i.e. 78 dpa for small sites rather than 98 dpa as
Windfall TOTAL SUPPLY	688	518	636	842	736	708	393	0	216	102 954	102 822	102 619	102 467	102 443	102 343	102 342	102 386	102 431	918 9544	proposed by the Council for first 7 years of Plan period.
Requirement Annual Shortfall/Surplus	749 - 61	749 -231	749 -113	749 93	749 -13	749 - 41	749 -356	749 - 749	749 -533	749 205	749 73	749 -130	749 - 282	749 - 306	749 -406	749 - 407	749 -363	749 -318	13482	
Cumulative Shortfall/Surplus	0	-61	-292	-405	-312	-325	-366	-722	-1471	-2004	-1799	-1726	-1856	-2138	-2444	-2850	-3257	-3620		
Base 5 Year Requirement Shortfall/oversupply (Sedgefield)	3745 0.0	3745 -61.0	3745 -292.0	3745 -405.0	3745 -312.0	3745 -325.0	3745 -366.0	3745 -722.0	3745 -1471.0	3745 -2004.0	3745 -1799.0	3745 -1726.0	3745 -1856.0	3745 -2138.0						
5 Year Requirement with Shortfall/oversupply Adjuste 5 Year Requirement with 5% Buffer	3745.0 3932.3	3806.0 3996.3	4037.0 4238.9	4150.0 4357.5	4057.0 4259.9	4070.0 4273.5	4111.0 4316.6	4467.0 4690.4	5216.0 5476.8	5749.0 6036.5	5544.0 5821.2	5471.0 5744.6	5601.0 5881.1	5883.0 6177.2						
Adjusted Annual Requirement (5yr)	786.5	799.3	847.8	871.5	852.0	854.7	863.3	938.1	1095.4	1207.3	1164.2	1148.9	1176.2	1235.4						
S Year Supply Supply in Years	3420 4,35	3440 4,30	3315 3.91	2679 3.07	2053	2271 2,66	2385 2.76	2611 2,78	3078 2.81	3305 2,74	2694 2,31	2214 1.93	1981 1.68	1945 1,57						

Notes:

1. Applies 749 dpa uncapped 5td Method Figure
2. Sedgefield amd 5% Buffer
2. Sedgefield amd 5% Buffer
3. Council's supply sources as set out in Local Plan Development Strategy Topic Paper Addendum and Updated Local Plan Housing Trajectory
4. Adjustments made to Windfalls to Reflect Compelling Evidence Test
5. Adjustments made to allocations to Reflect Annex 2 test in context of first 5-year period
6. Adjustments made to Paddock Wood to reflect realistic delivery trajectories
7. Adjustments made to consented sites to reflect Annex 2 test in context of first 5-year period

Appendix 2

Lichfields - Start to Finish: How Quickly do Largescale Housing Sites Deliver - February 2020

INSIGHT FEBRUARY 2020

Start to Finish

What factors affect the build-out rates of large scale housing sites?

SECOND EDITION





Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 50 years.



Lichfields published the first edition of Start to Finish in November 2016. In undertaking the research, our purpose was to help inform the production of realistic housing trajectories for plan making and decision taking. The empirical evidence we produced has informed numerous local plan examinations, S.78 inquiries and five-year land supply position statements.

Meanwhile, planning for housing has continued to evolve: with a revised NPPF and PPG; the Housing Delivery Test and Homes England upscaling resources to support implementation of large sites. Net housing completions are also at 240,000 dwellings per annum. With this in mind, it is timely to refresh and revisit the evidence on the speed and rate of delivery of large scale housing sites, now looking at 97 sites over 500 dwellings. We consider a wide range of factors which might affect lead-in times and build-out rates and have drawn four key conclusions.

In too many local plans and five-year land supply cases, there is insufficient evidence for how large sites are treated in housing trajectories. Our research seeks to fill the gap by providing some benchmark figures - which can be of some assistance where there is limited or no local evidence - but the averages derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site.

We have drawn four key conclusions:

Large schemes can take 5+ years to start

Our research shows that if a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in c.3 years. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.

Large greenfield sites deliver quicker

Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units. Furthermore, large scale brownfield sites deliver at a slower rate than their greenfield equivalents: the average rate of build out for greenfield sites in our sample is 34% greater than the equivalent brownfield.

Lead-in times jumped post recession

Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining precommencement conditions, but is also likely impacted by a number of macro factors.

4 Outlets and tenure matter

2

Our analysis suggests that having additional outlets on site has a positive impact on build-out rates. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale.

Key figures



01 **Introduction**

This is the second edition of our review on the speed of delivery on large-scale housing development sites. The first edition was published in November 2016 and has provided the sector with an authoritative evidence base to inform discussions on housing trajectories and land supply at planning appeals, local plan examinations and wider public policy debates.

Over this period, housing delivery has remained at or near the top, of the domestic political agenda: the publication of the Housing White Paper, the new NPPF, an emboldened Homes England, a raft of consultations on measures intended to improve the effectiveness of the planning system and speed up delivery of housing. Of particular relevance to Start to Finish was the completion of Sir Oliver Letwin's independent review of build out ("the Letwin Review"), the inclusion within the revised NPPF of a tighter definition of 'deliverable' for the purposes of five-year housing land supply (5YHLS) assessment, and the new Housing Delivery Test which provides a backward looking measure of performance. The policy aim is to focus more attention on how to accelerate the rate of housing build out, in the context of the NPPF (para 72) message that the delivery of a large numbers of new homes can often be best achieved through larger scale development such as new settlements or significant extensions to existing villages and towns, but that these need a realistic assessment of build-out rates and lead in times of large-scale development.

This second edition of *Start to Finish* is our response to the latest policy emphasis. It provides the planning sector with real-world benchmarks to help assess the realism of housing trajectory assumptions, particularly for locations where there have been few contemporary examples of strategic-scale development. The first edition looked in detail at how the size of the site affected build-out rates and lead in times, as well as other factors such as the value of the land and whether land was greenfield or brownfield. We have updated these findings, as well as considering additional issues such as how the affordability of an area and the number of outlets on a site impacts on annual build-out rates.

We have also expanded the sample size (with an extra 27 large sites, taking our total to 97 large sites, equivalent to over 195,000 dwellings) and updated with more recent data to the latest monitoring year (all data was obtained at or before the 1st April 2019).



Our research complements, rather than supplants, the analysis undertaken by Sir Oliver Letwin in his Review. The most important differentiation is that we focus exclusively on what has been built, whereas each of the sites in the Letwin Review included forecasts of future delivery. Additionally, the Letwin Review looked at 15 sites of 1,500+ homes, of which many (including the three largest) were in London. By contrast, the examples in this research sample include 46 examples of sites over 1,500 homes across England and Wales, the majority of which are currently active. As with the first edition of our research, we have excluded London because of the distinct market and delivery factors in the capital.

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03	Timing is everything	5
04	How quickly do sites build out?	9
05	What factors influence build-out rates?	14
06	Conclusions	18

ı

180

sites

97

large sites of 500 units or more

27

additional sites compared with our 2016 research

8

sites also included in Sir Oliver Letwin's review

02

Methodology

The evidence presented in this report analyses how large-scale housing sites emerge through the planning system, how quickly they build out, and identifies the factors which lead to faster or slower rates of delivery.

We look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the various stages of development have been codified. Figure 1 sets out the stages and the milestones used, which remain unchanged from the first edition of this research. The overall 'lead-in time' covers stages associated with gaining an allocation, going through the 'planning approval period' and 'planning to delivery period', finishing when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time. The annualised buildout rates are also recorded for the development up until the latest year where data was available at April 2019 (2017/18 in most cases). Detailed definitions of each of these stages can be found in Appendix 1. Not every site assessed will necessarily have gone through each component of the identified stages as many of the sites we considered had not delivered all dwellings permitted at the time of assessment, some have not delivered any dwellings.

Information on the process of securing a development plan allocation (often the most significant step in the planning process for large-scale schemes, and which – due to the nature of the local plan process – can take decades) is not easy to obtain on a consistent basis across all examples, so is not a significant focus of our analysis. Therefore, for the purposes of this research the lead-in time reflects the start of the planning approval period up to the first housing completion.

The 'planning approval period' measures the validation date of the first planning application on the site (usually an outline application but sometimes hybrid), to the decision date of the first detailed application to permit dwellings in the scheme (either full, hybrid or reserved matters applications). It is worth noting that planning applications are typically preceded

by significant amounts of pre-application engagement and work, plus the timescale of the local plan process.

The 'planning to delivery' period follows immediately after the planning approval period and measures the period from the approval of the first detailed application to permit development of dwellings and the completion of the first dwelling.

Development and data

Whilst our analysis focuses on larger sites, we have also considered data from the smaller sites for comparison and to identify trends. The geographic distribution of the 97 large sites and comparator small sites is shown in Figure 2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to secure a range of locations and site sizes in the sample, but there is no way of ensuring it is representative of the housing market in England and Wales as a whole, and thus our conclusions may not be applicable in all areas or on all sites. In augmenting our sample with 27 additional large sites, new to this edition of our research, we sought to include examples in the Letwin Review that were outside of London, only excluding them

Box I: Letwin Review sites

- Arborfield Green (also known as Arborfield Garrison), Wokingham
- Ledsham Garden Village, Cheshire West & Chester
- Great Kneighton (also known as Clay Farm), Cambridge (included in the first edition of this research)
- 4. Trumpington Meadows, Cambridge
- 5. Graven Hill, Cherwell
- 6. South West Bicester, Cherwell
- 7. Great Western Park, South Oxfordshire
- 8. Ebbsfleet, Gravesham and Dartford (included in the first edition of this research)

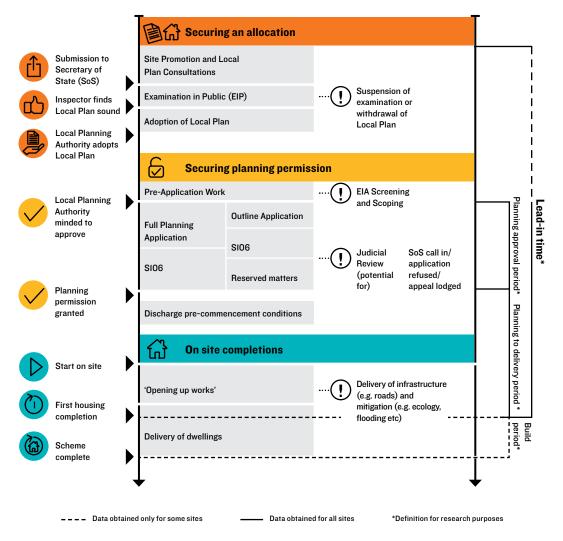
when it was difficult to obtain reliable data. The study therefore includes the Letwin Review's case studies listed in Box 1.

In most instances, we were unable to secure the precise completion figures for these sites that matched those cited in the Letwin Review. Sources for data Lichfields has obtained on completions for those sites that also appear in the Letwin Review are included at the end of Appendix 2.

The sources on which we have relied to secure delivery data on the relevant sites include:

- Annual Monitoring Reports (AMRs) and other planning evidence base documents¹ produced by local authorities;
- 2. By contacting the relevant local planning authority, and in some instances the relevant County Council, to confirm the data or receive the most up to date figures from monitoring officers or planners; and
- In a handful of instances obtaining/ confirming the information from the relevant house builders.

Figure I: Timeline for the delivery of strategic housing sites



Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

196,714

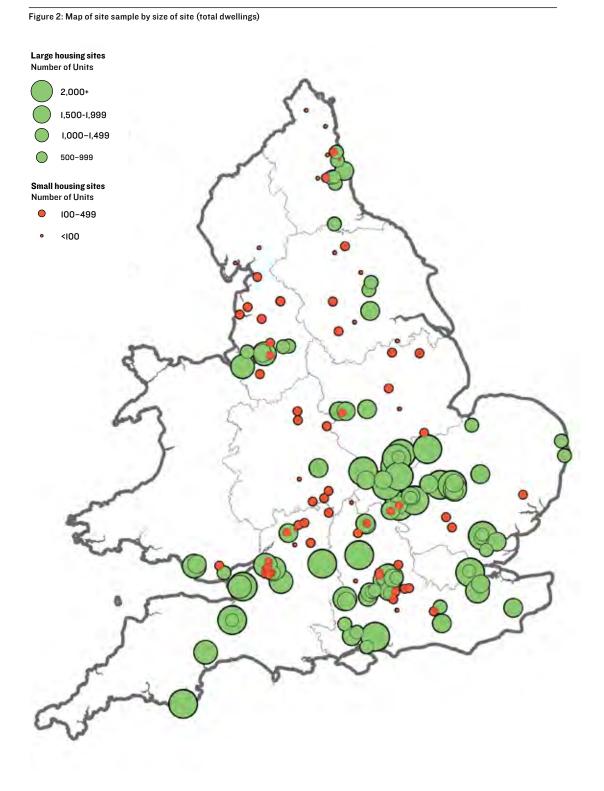
units on large sites of 500 or more homes

16,467

units on small sites under 500 homes

35

sites of 2,000 homes or more



Timing is everything: how long does it take to get started?

In this section we look at lead in times, the time it takes for large sites to get the necessary planning approvals. Firstly, the changing context of what 'deliverable' means for development. Secondly, the 'planning approval period' (the time it takes for large sites to get the necessary planning approvals). And thirdly, the 'planning to delivery period' (the time from approval of the first detailed application to permit development of dwellings to the completion of the first dwelling).

The new definition of 'Deliverable'

The question of how quickly and how much housing a site can begin delivering once it has planning permission, or an allocation, has become more relevant since the publication of the new NPPF with its new definition of deliverable. Only sites which match the deliverability criteria (i.e. suitable now, available now and achievable with a realistic prospect that housing will be delivered on the site within five years) can be included in a calculation of a 5YHLS by a local authority. This definition was tightened in the revised NPPF which states that:

"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". (emphasis added)

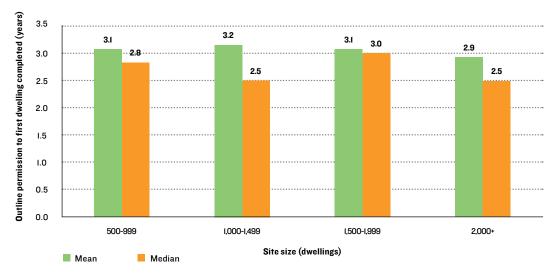
What constitutes 'clear evidence' was clarified in a number of early appeal decisions and in the Planning Practice Guidance² and can include information on progress being made towards submission of a reserved matters application, any progress on site assessment work and any relevant information about site viability, ownership constraints or infrastructure provision. In this context, it is relevant to look at how long it takes, on average, for a strategic housing site to progress from obtaining outline permission to delivering the first home (or how long it takes to obtain the first reserved matters approval, discharge pre-commencement conditions and open up the site), and then how much housing could be realistically expected to be completed in that same five-year period.

Based on our sample of large sites, the research shows that, upon granting of outline permission, the time taken to achieve the first dwelling is – on average c.3 years, regardless of site size. After this period an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4). Outline planning permissions for strategic development are not

c.3 years

average time from obtaining outline permission to first dwelling completion on sites of 500+ homes

Figure 3: Average time taken from gaining outline permission to completion of the first dwelling on site (years), compared to site size



² Planning Practice Guidance Reference ID: 68-007-20190722



Only sites of fewer than 499 dwellings are on average likely to deliver any homes within an immediate five year period. always obtained by the company that builds the houses, indeed master developers and other land promoters play a significant role in bringing forward large scale sites for housing development³. As such, some of these examples will include schemes where the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period.

Figure 4 considers the average timescales for delivery of the first dwelling from the validation of an outline planning application. This demonstrates that only sites comprising fewer than 499 dwellings are – on average – likely to deliver anything within an immediate five year period. The average time from validation of an outline application⁴ to the delivery of the first dwelling for large sites ranges from 5.0 to 8.4 years dependent on the size of the site, i.e. beyond an immediate five-year period for land supply calculations.

Comparison with our 2016 findings

Planning Approval Period

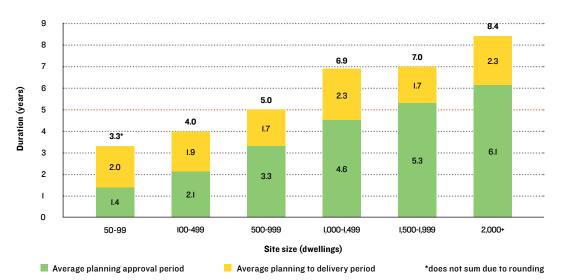
Our latest research reveals little difference between the average planning approval period by site size compared to the same analysis in the first edition (see Table 1). However, it is important to remember that these are average figures which come from a selection of large sites. There are significant variations within this average, with some sites progressing very slowly or quickly compared to the other examples. This is unsurprising as planning circumstances will vary between places and over time.

Table I: Average planning approval period by size of site (years)

Site Size	lst edition research (years)	This research (years)
50-99	1.1	1.4
100-499	2.4	2.1
500-999	4.2	3.3
1,000-1,499	4.8	4.6
1,500-1,999	5.4	5.3
2,000+	6.1	6.1

Source: Lichfields analysis

Figure 4: Average timeframes from validation of first application to completion of the first dwelling



Source: Lichfields analysis

⁴The planning approval period could also include a hybrid or full application, but on the basis of our examples this only impacts a small number of sites

³Realising Potential - our research for the Land Promoters and Developers Federation in 2017 - found that 41% of homes with outline planning permission were promoted by specialist land promoter and development companies, compared to 32% for volume house builders.

Planning to Delivery Period

Although there is little difference between the average planning approval periods identified in this research compared to our first edition findings, the average lead-in time after securing planning permission is higher (Figure 5). It is this period during which pre-commencement planning conditions have to be discharged as well as other technical approvals and associated commercial agreements put in place.

This is likely due to the inclusion of more recent proposed developments in this edition. Of the 27 new sites considered, 17 (63%) completed their first dwelling during or after 2012; this compares to just 14 (20%) out of 70 sites in the first edition of this research (albeit at the time of publication 8 of these sites had not delivered their first home but have subsequently). This implies that the introduction of more recent examples into the research, including existing examples which have now commenced delivery⁵, has seen the average for planning to delivery periods lengthening.

A similar trend is apparent considering the 55 sites that delivered their first completions after 2007/08. These have significantly longer planning to delivery periods than those where completions began prior to the recession. The precise reasons are not clear, but is perhaps to be expected given the slowdown in housing delivery during the recession, and the significant reductions in local authority planning resources which are necessary to support discharge of pre-commencement conditions. However, delays may lie outside the planning system; for example, delays in securing necessary technical approvals from other bodies and agencies, or market conditions.



Sites that delivered their first completion during or after the 2007/08 recession have significantly longer planning to delivery periods than sites which began before.

Figure 5: Planning to delivery period, total average, pre and post-2008

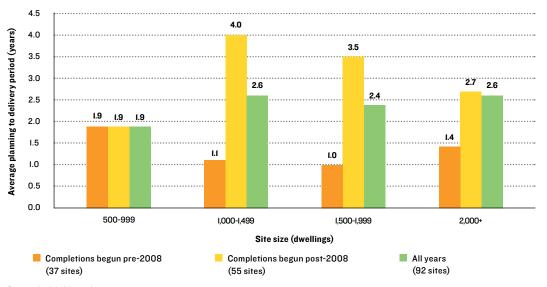


Figure 5: Five of the large sites examples do not have a first dwelling completion recorded in this research

⁵ Priors Hall has been amended since the first edition based on more recent data

In demand: how quickly do high pressure areas determine strategic applications for housing?

Using industry-standard affordability ratios, we found that areas with the least affordable places to purchase a home (i.e. the highest affordability ratios) tended to have longer planning to delivery times than areas that were more affordable. This is shown in Figure 6, which splits the large site sample into national affordability quartiles, with the national average equating to 8.72.

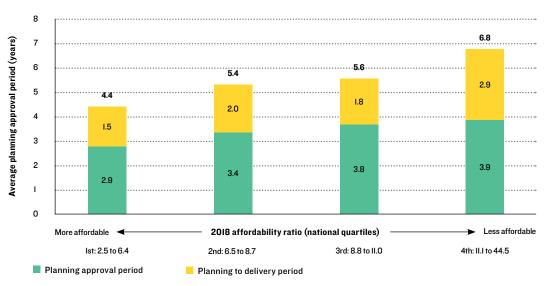
The above analysis coincides with the fact (Table 2) that sites in the most affordable locations (lowest quartile) tend to be smaller than those in less affordable locations (an average site size of c.1,150 compared to in excess of 2,000 dwellings for the three other quartiles). Even the least affordable LPAs (with the greatest gap between workplace earnings and house prices) have examples of large schemes with an average site size of 2,000+ dwellings. It may be that the more affordable markets do not support the scale of up-front infrastructure investment that is required for larger-scale developments and which lead to longer periods before new homes can be built. However, looking at the other three quartiles, the analysis does also suggest that planning and implementation becomes more challenging in less affordable locations.

Table 2: Site size by 2018 affordability ratio

Affordability ratio (workplace based)	Average site size
2.5 - 6.4	1,149
6.5 - 8.7	2,215
8.8 - 11.0	2,170
II.I - 44.5	2,079

Source: Lichfields analysis

Figure 6: Planning approval period (years) by 2018 affordability ratio



O4 How quickly do sites build out?

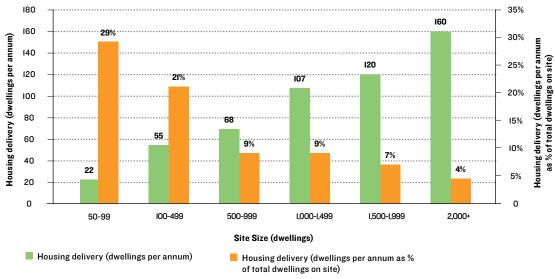
The rate at which new homes are built on sites is still one of the most contested matters at local plan examinations and planning inquiries which address 5YHLS and housing supply trajectories. The first edition of this research provided a range of 'real world' examples to illustrate what a typical large-scale site delivers annually. The research showed that even when some schemes were able to achieve very high annual build-out rates in a particular year (the top five annual figures were between 419-620 dwellings per annum), this rate of delivery was not always sustained. Indeed, for schemes of 2,000 or more dwellings the average annual completion rate across the delivery period was 160 dwellings per annum.

Average Annual Build-out rates

Figure 7 presents our updated results, with our additional 27 sites and the latest data for all sites considered. The analysis compares the size of site to its average annual build-out rate. Perhaps unsurprisingly, larger sites deliver on average more dwellings per year than smaller sites. The largest sites in our sample of over 2,000 dwellings, delivered on average more than twice as many dwellings per year than sites of 500-999 dwellings, which in turn delivered an average of three times as many units as sites of 1-99 units. To ensure the build-out rates averages are not unduly skewed, our analysis excludes any sites which have only just started delivering and have less than three years of data. This is because it is highly unlikely that the first annual completion figure would actually cover a whole monitoring year, and as such could distort the average when compared to only one other full year of delivery data.

the average annual build rate for schemes of 2,000+ dwellings





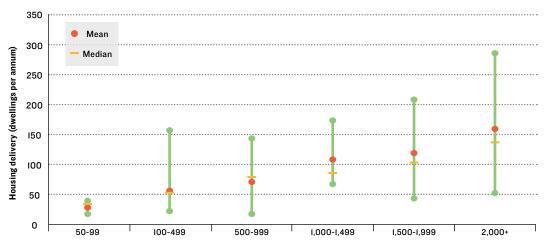
INSIGHT START TO FINISH



In most cases the median annual delivery rate is lower than the mean for larger sites. We include the relevant percentage growth rates in this edition's analysis; this shows that the proportion of a site's total size that is build out each year reduces as site size increases.

Our use of averages refers to the arithmetic mean across the sample sites. In most cases the median of the rates seen on the larger sample sites is lower, as shown in Figure 8; this reflects the small number of sites which have higher delivery rates (the distribution is not equal around the average). The use of mean average in the analysis therefore already builds in a degree of optimism compared with the median or 'mid-point scheme'.

Figure 8: Minimum, mean, median and maximum build-out rates by size of site (dpa)



Source: Lichfields analysis

Site Size (dwellings)

Table 3: Median and mean delivery rates by site size

Site Size	Number of sites	Median housing delivery (dwellings per annum)	Median delivery as % of total on site	Mean annual delivery (dwellings per annum)	Mean annual delivery as % of total units on site
50-99	29	27	33%	22	29%
100-499	54	54	24%	55	21%
500-999	24	73	9%	68	9%
1,000-1,499	17	88	8%	107	9%
1,500-1,999	9	104	7%	120	7%
2,000+	27	137	4%	160	4%

Comparison with our 2016 findings

Comparing these findings to those in the first edition of this research, there is very little difference between the averages observed (median was not presented) for different site sizes, as set out below. The largest difference is a decrease in average annual build-out rates for sites of 1,000-1,499 dwellings, but even then, this is only a reduction of 10 dpa or 9%.

As with the first edition of the research, these are averages and there are examples of sites which deliver significantly higher and lower than these averages, both overall and in individual years. Figure 8 shows the divergence from the average for different site size categories. This shows that whilst the average for the largest sites is 160 dpa and the median equivalent 137 dpa, the highest site average was 286 dpa and the lowest site average was 50 dpa for sites of 2,000+ dwellings. This shows the need for care in interpreting the findings of the research, there may well be specific factors that mean a specific site will build faster or slower than the average. We explore some of the factors later in this report.

Variations for individual schemes can be marked. For example, the 2,605 unit scheme South of the M4 in Wokingham delivered 419 homes in 2017/18, but this was more than double the completions in 2016/17 (174) and the average over all six years of delivery so far was just 147 dwellings per annum.

Even when sites have seen very high peak years of delivery, as Table 5 shows, no sites have been able to consistently delivery 300 dpa.



Site build-out rates for individual years are highly variable. For example, one scheme in Wokingham delivered more than twice as many homes in 2017/18 as it did in the year before.

Table 4: Mean delivery rates by site sizes, a comparison with first edition findings

Site size (dwellings)	2016 edition research (dpa)	2020 edition research (dpa)	Difference
50-99	27	22	-5 (-19%)
100-499	60	55	-5 (-8%)
500-999	70	68	-2 (-3%)
1,000-1,499	117	107	-10 (-9%)
1,500-1,999	129	120	-9 (-7%)
2,000+	161	160	-I (-0.62%)

Source: Lichfields analysis

Table 5: Peak annual build-out rates compared against average annual delivery rates on those sites

		Peak annual	Average annual build-outrate (dpa)	
Site	Site size (dwellings)	build-out rate (dpa)		
Cambourne, South Cambridgeshire	4,343	620	223	
Oakley Vale, Corby	3,100	520	180	
Eastern Expansion Area, Milton Keynes	4,000	473	268	
Clay Farm, Cambridge	2,169	467	260	
South of M4, Wokingham	2,605	419	147	
Cranbrook, East Devon	2,900	419	286	

Source: Lichfields analysis

Table 5: Please note The Hamptons was included as an example of peak annual delivery in the first edition with one year reaching 520 completions. However, evidence for this figure is no longer available and as it was not possible to corroborate the figure it has been removed. The analysis has been updated to reflect the latest monitoring data from Peterborough City Council.

Longer term trends

This section considers the average build-out rates of sites which have been delivering over a long period of time. This is useful in terms of planning for housing trajectories in local plans when such trajectories may span an economic cycle.

In theory, sites of more than 2,000 dwellings will have the longest delivery periods. Therefore, to test long term averages we have calculated an average build-out rate for sites of 2,000+ dwellings that have ten years or more of completions data available.

For these sites, the average annual build-out rate is slightly higher than the average of all sites of that size (i.e. including those only part way through build out), at 165 dwellings per annum⁶. The median for these sites was also 165 dwellings per annum.

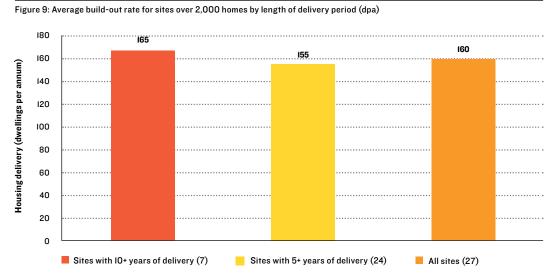
This indicates that higher rates of annual housing delivery on sites of this size are more likely to occur between years five and ten, i.e. after these sites have had time to 'ramp up'.

It might even relate to stages in delivery when multiple phases and therefore multiple outlets (including affordable housing) are operating at the same time. These factors are explored later in the report.

The impact of the recession on build-out rates

It is also helpful to consider the impact of market conditions on the build-out rate of large scale housing sites. Figure 10 overleaf shows the average delivery rate of sites of 2,000 or more dwellings in five-year tranches back to 1995/96. This shows that although annual build-out rates have improved slightly since the first half of the 2010's, they remain 37% below the rates of the early 2000's. The reasons for the difference are not clear and are worthy of further exploration – there could be wider market, industry structure, financial, planning or other factors at play.

In using evidence on rates of delivery for current/historic schemes, some planning authorities have suggested that one should adjust for the fact that rates of build out may have been affected by the impact of the recession. We have therefore considered how the average rates change with and without including the period of economic downturn (2008/09 – 2012/13). This is shown in Table 6 and it reveals that average build-out rates are only slightly depressed when one includes this period, but may not have fully recovered to their pre-recession peaks. We know that whilst the recession – with the crunch on mortgage



⁶This is based on the completions of seven examples, Chapelford Urban Village, Broadlands, Kings Hill, Oakley Vale, Cambourne, The Hamptons and Wixhams

availability - did have a big impact and led to the flow of new sites slowing, there were mechanisms put in place to help sustain the build out of existing sites.

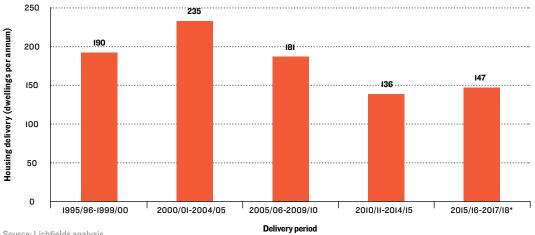
However, setting aside that stripping out the recession has a modest impact on the statistical averages for the sites in our sample, the more significant point is that – because of economic cycles - larger sites which build out over five or more years are inherently likely to coincide with a period of economic slowdown at some point during their build out. It therefore makes sense for housing trajectories for such sites to include an allowance for the prospect that, at some point, the rate of build out may slow due to a market downturn, albeit the effect may be smaller than one might suspect.

Table 6: Impact of recession on build-out rates

	Build-out rates in all years		Build-out rates excluding recession years (2008/9-2012/13)		Build-out rates pre-recession	
	Average rate	Sample size	Average rate	Sample size	Average rate	Sample size
All large sites 500+	115	77	126	68	130	21
All large sites 2,000+	160	27	171	25	242	6
Greenfield sites 2,000+	181	14	198	12	257	3

Source: Lichfields analysis

Figure IO: Average build-out rate by five year period for sites over 2,000 dwellings (dpa)



+34%

higher average annual build-out rates on greenfield land compared with brownfield

What factors can influence build-out rates?

Having established some broad averages and how these have changed over time, we turn now to look at what factors might influence the speed at which individual sites build out. How does housing demand influence site build out? What is the impact of affordable housing? Does it matter whether the site is greenfield or brownfield? What about location and site configuration?

In demand: do homes get delivered faster in high pressure areas?

One theory regarding annual build-out rates is that the rate at which homes can be sold (the 'absorption rate') determines the build-out rate. This is likely to be driven by levels of market demand relative to supply for the product being supplied.

This analysis considers whether demand for housing at the local authority level affects delivery rates by using (industry-standard) affordability ratios. Higher demand areas are indicated by a higher ratio of house prices to earnings i.e. less affordable. Whilst this is a broad-brush measure, the affordability ratio is a key metric in the assessment of local housing need under the Government's standard methodology. Figure 11 shows the sample of 500+ unit schemes divided into those where the local authority in which they are located is above or below the national median affordability ratio (8.72) for sites which have

delivered for three years or more. This analysis shows that sites in areas of higher demand (i.e. less affordable) deliver on average more dwellings per annum.

Our analysis also coincides with the fact that sites in less affordable areas are on average c.17% larger than those in more affordable areas. The average site size for schemes in areas where affordability is below the national average is 1,834 dwellings. For those delivered in areas where the affordability is greater than the national average, average site size is 2,145 dwellings. So, it is possible that the size of site – rather than affordability *per se* – is a factor here.

Do sites on greenfield land deliver more quickly?

The first edition of this research showed that greenfield sites on average delivered quicker than their brownfield counterparts. In our updated analysis this remains the case; large greenfield sites in our sample built out a third faster than large brownfield sites.

In the life cycle of a site, our data also shows that greenfield sites had shorter planning to delivery periods (2.0 years compared to 2.3 for brownfield sites), although on average, longer planning approval periods (5.1 years compared to 4.6 for brownfield sites).

Figure II: Build-out rates by level of demand using national median 2018 workplace based affordability ratio (dpa)

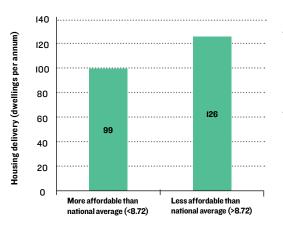
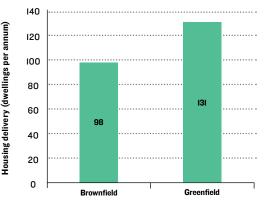


Figure I2: Build-out rates on brownfield and greenfield sites (dpa)



Source: Lichfields analysis

Source: Lichfields analysis

Housing mix and variety

Among the more topical issues surrounding delivery rates on large-scale sites is the variety of housing on offer. The Letwin Review posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build out. The report concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have used the number of sales outlets on a site as a proxy for variety of product. This gives the prospect of multiple house builders each seeking to build and sell homes for which there is demand in the face of 'competing' supply from other outlets (as revealed by the case study of Land South of the M4 in Wokingham). Letwin stated that "...it seems extraordinarily likely that the presence of more variety in these aesthetic characteristics would create more, separate markets". Clearly, it is likely that on many sites, competing builders may focus on a similar type of product, for example three or four bed family housing, but even across similar types of dwelling, there will be differences (in configuration, design, specification) that mean one product may be attractive to a purchaser in the way another might

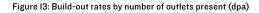
not be. On this basis, we use the outlets metric as a proxy for variation. Based on the limited data available for this analysis, if two phases are being built out at the same time by the same housebuilder (e.g. two concurrent parcels by Bovis) this has been counted as one outlet with the assumption there is little variety (although it is clear that some builders may in reality differentiate their products on the same site). This data was derived from sites in a relatively small number of local planning authorities who publish information relating to outlets on site. It therefore represents a small sample of just 12 sites, albeit over many different years in which the number of outlets varied on the same site, giving a total of 80 data points i.e. individual delivery rates and number of outlets to compare.

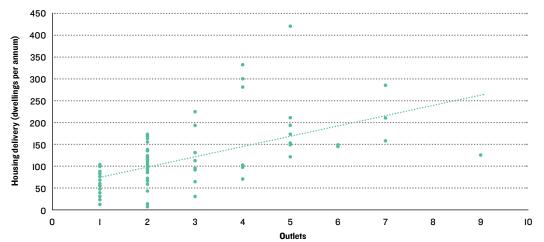
Our analysis confirms that having more outlets operating at the same time will on average have a positive impact on build-out rates, as shown in Figure 13. However, there are limits to this, likely to be due to additional capacity from the outlets themselves as well as competition for buyers.

On a site-by-site basis, the average number of outlets open over the site's entire delivery lifetime had a fairly strong correlation with annual delivery, both as a percentage of total dwellings and in absolute terms, with a greater number of outlets contributing to higher levels of delivery. However, the completions per outlet did reduce with every additional outlet operating in that year.⁸



Having more outtlets operating at the same time will on average quicken build-out rates.





Source: Lichfields analysis

⁷Letwin Review draft analysis report (June 2018)

⁻ final bullet of para 4.25

⁸ Average completions per outlet on site with one outlet was 6ldpa, dropping to 5ldpa for two outlets and 45dpa for three outlets.

Geography and Site Configuration

An under-explored aspect of large-scale site delivery is the physical opportunity on site. For example, some schemes lend themselves to simultaneous build out of phases which can have the impact of boosting delivery rates in that year, for example, by having access points from two alternative ends of the site. Other sites may be reliant on one key piece of infrastructure which make this opportunity less likely or impractical. In the first edition of this research we touched on this point in relation to Eastern Expansion Area (Broughton Gate & Brooklands) of Milton Keynes. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research as serviced parcels with the roads already provided were delivered as part of the Milton Keynes delivery model. Multiple house builders were able to proceed straight onto the site and commence delivery on different serviced parcels, with monitoring data from Milton

Keynes Council suggesting an average of c.12 parcels were active across the build period. In this second edition of this research the Milton Keynes examples remain some of the sites with the highest annual build-out rates.

Table 7: Parcels at Land South of M4, Wokingham

Parcel reference	Developers (active outlets)	Completions in 2017/18
SPI	Bellway (I)	59
SP2w	Bellway and Bovis (-)	None - parcel completed
SP3	Crest Nicholson (I)	47
SP4	Taylor Wimpey and David Wilson Homes (2)	140
SP9_I	Bloor, Bovis and Linden (3)	169
SPIO	Darcliffe Homes (-)	None - parcel completed
SPII	Taylor Wimpey (I)	4

Source: Lichfields analysis

Figure I4: Map of parcels at Land South of M4, Wokingham



Source: © Google Earth 2020/ Wokingham Local Plan

In this edition we look at the case study of Land South of the M4 in Wokingham. In 2017/18 the site achieved a significant 419 completions. Using the local authority's granular recording of delivery on the site to date, we have been able to consider where these completions were coming forward from within the wider 2,605 dwelling scheme. As shown in Figure 14, in that year new homes were completed on five separate parcels with completions ranging from 4 to 169 dwellings. On some of these parcels (SP9_1 and SP₄) there were two or three separate housebuilders building out, and in total on the site there were seven different house building companies active (the impact of multiple outlets on build-out rates is explored later in this report). The parcels are located in separate parts of the site and each had their own road frontages and access arrangements which meant they are able to come forward in parallel. This can enable an increased build rate.

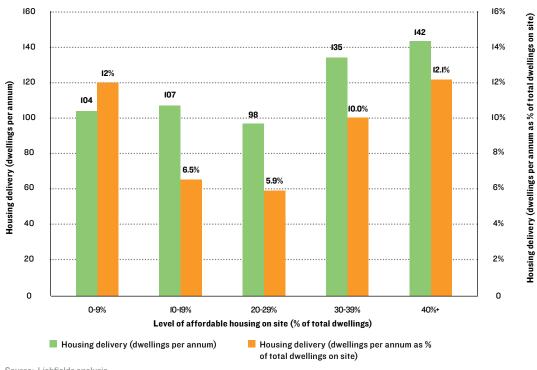
Affordable choices: do different tenures provide more demand?

Our findings on tenure, another form of 'variety' in terms of house building products, are informed by data that is available on about half the sites in our large site sample. From this the analysis shows schemes with more affordable housing built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all dwellings on site. However this is not always the case. Schemes with 20-29% affordable housing had the lowest build-out rates, both in terms of dwellings and proportionate to their size.



Schemes with more affordable housing built out at close to twice the rates as those with lower levels.

Figure 15: Build-out rates by level of affordable housing (dpa and percentage)



Source: Lichfields analysis

INSIGHT START TO FINISH

06 **Conclusions**

Recent changes to national planning policy emphasise the importance of having a realistic expectation of delivery on large-scale housing sites, whilst local authorities now find themselves subject to both forward and backward-looking housing delivery performance measures. A number of local plans have hit troubles because they over-estimated the yield from some of their proposed allocations. Meanwhile, it is no longer sufficient for a 5YHLS to look good on paper; the Housing Delivery Test means there are consequences if it fails to convert into homes built.

To ensure local authorities are prepared for these tests, plan making and the work involved in maintaining housing land supply must be driven by realistic and flexible housing trajectories, based on evidence and the specific characteristics of individual sites and local markets. For local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period. Equally, recognising the ambition and benefits of more rapid build out on large sites, it may mean a greater focus on how such sites are developed.

Our research provides those in the public and private sector with a series of real-world benchmarks in this complex area of planning for large scale housing, which can be particularly helpful in locations where there is little recent experience of such strategic developments. Whilst we present some statistical averages, the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and that these - alongside the characteristics of individual sites - need to be considered carefully by local authorities relying on large sites to deliver planned housing.

In too many local plans and 5YHLS cases, there is insufficient evidence for how large sites are treated in housing trajectories. This research seeks to fill the gap with some benchmark figures - which can be of some assistance where there is limited or no local evidence. But the average derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different. Therefore, whilst the averages observed in this research may be a good starting point, there are a number of key questions to consider when estimating delivery on large housing sites, based around the three key elements in the threetier analytical framework at Figure 16.

Key findings:

1

Large schemes can take 5+ years to start

In developing a local plan, but especially in calculating a 5YHLS position, it is important to factor in a realistic planning approval period dependent on the size of the site. Our research shows that if a scheme of more than 500 dwellings has an outline permission, then the average time to deliver its first home is two or three years. However, from the date at which an outline application is validated it can be 5.0 - 8.4 years for the first home to be delivered dependent on the size of the site. In these circumstances, such sites would make no contribution to completions in the first five years.

2

Lead-in times jumped post-recession

Whilst attention and evidence gathering is often focused on how long it takes to get planning permission, the planning to delivery period from gaining permission to building the first house has also been increasing. Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors including the recession and reductions in local authority planning resources.

3

Large greenfield sites deliver quicker

Large sites can deliver more homes per year over a longer time period, with this seeming to ramp up beyond year five of the development on sites of 2,000+ units. However, on average these longerterm sites also have longer lead-in times. Therefore, short term boosts in supply, where needed, are likely to also require a good mix of smaller sites. Furthermore, large scale greenfield sites deliver at a quicker rate than their brownfield equivalents: the average rate of build out for greenfield sites in our sample was 34% greater than the equivalent figure for those on brownfield land. In most locations, a good mix of types of site will therefore be required.

4

Outlets and tenure matter

Our analysis suggests that having additional outlets on site has a positive impact on build out rates, although there is not a linear relationship. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site, but those with 20-29% had the lowest rates of all. Local plans should reflect that - where viable – higher rates of affordable housing supports greater 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).

Figure 16: Key questions for assessing large site build-out rates and delivery timelines



Planning Approval

- Is the site already allocated for development? If it is in an emerging Plan, does it need to be adopted before the site can be brought forward?
- Is an SPD, masterplan or development brief required and will it help resolve key planning issues?
- Is there an extant planning permission or live planning application submitted?
- If outline permission is granted, when will reserved matters be submitted?
- Is the proposal of the promoter consistent with local policy and/or SPD/Masterplan?
- Are there significant objections to the proposal from local residents?
- Are there material objections to the proposal from statutory bodies?
- If planning permission is secured, is reserved matters approval required?



Lead In

- Does the scheme have pre-commencement conditions?
- Is the land in existing use?
- Has the land been fully assembled?
- Are there any known technical constraints that need to be resolved?
- If in multiple ownership/control, are the interests of all parties aligned?
- Is there up-front infrastructure required before new homes can be built?
- Has the viability of the proposal been established and is the feasibility consistent with known infrastructure costs and the likely rate of development?
- Does the proposal rely on access to public resources and what evidence is there on when those will be available?
- Is the scheme led by a promoter or master developer who will need to dispose of phases to a house builder before completions begin?



Build Out

- How large is the site?
- How strong is the local market?
- Does the site tap into local demand from one or more existing neighbourhoods?
- Will delivery be affected by competing sites?
- How many sales outlets will be supported by the scale, configuration and delivery model for the site?
- What is the track record of the promoter/master developer in delivery of comparable sites?
- How active are different housebuilders in the local market?
- What proportion of affordable housing is being delivered?
- Are there policy requirements for a specific mix of housing types and are there other forms of housing such as build to rent?
- 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-out rate achievable in different phases?

Appendices

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Appendix 1: Definitions and notes

The 'lead in'

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time does also include the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The 'planning period'

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). A measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.

The 'planning to delivery period'

Includes the discharge of any pre-commencement and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

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 midpoint of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The 'annual build-out rate'

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMR's) and other planning evidence base documents produced by local authorities (see footnote 1), contacting the local planning authority monitoring officers or planners and in a handful of instances obtaining the information from housebuilders.

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 age 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 the vast majority of sites. And because not all of the sites assessed have commenced housing delivery, build-out rate information is not universal. The results are presented accordingly.

Appendix 2: Large sites tables

Site name	Local Planning	Site	Year of first	Year	ar	ä	Year	Year	Year Y	Year Ye	Year Ye	Year Year		Year Yea	ar Year	ır Year	Year	Year	Year	Year	Year	Year	Year	Year
	Authority	size	housing	_	2	е е	4					- 1		2					T		<u>6</u>	20	12	8
			completion										Dwe	Dwellings per annum	mnum									
Ebbsfleet	Gravesham/ Dartford	15,000	2009/10	127	79	55	20 4	44	40 6	60 141	11 312	2												
The Hamptons	Peterborough	6,320	86/2661	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3 26	290.3 29	290.3 29	290.3 224	4 224	1 154	157	L	29	Ō	34	54	001	
Rugby Radio Station	Rugby	6,200	N/A																					
East of Kettering	Kettering	5,500	2016/17	43	93																			
Sherford	Plymouth	5,500	2016/17	7	901																			
Priors Hall	Corby	5,200	2011/12	56	21	29	87	1 0/1	155 2	273														
Wichelstowe	Swindon	4,500	2008/09	158	93	195	64	001	61	44 60	0 57	_												
Monkton Heathfield	Taunton Deane	4,500	2012/13	22	76	220	161	222	148															
The Wixams	Bedford	4,500	2008/09	8	061	091	138	EII		109 44		7 47												
Cambourne	South Cambridgeshire	4,343	1999/2000	42	361	213	337 (620	151 3	377 26	267 219	061 6	0 162	2 206	6 154	121	129	239	201	92	126			
Eastern Expansion Area (Broughton Gate & Brooklands)	Milton Keynes	4,000	2008/09	154	359	37.1	14	473	138															
Locking Parklands	North Somerset	3,700	2011/12	23	45	97	75 1	0	21 8	98														
Stanton Cross	Wellingborough	3,650	N/A																					
Beaulieu Park	Chelmsford	3,600	2015/16	40	<u></u>	262																		
Northampton North SUE	Daventry	3,500	2017/18	50																				
Great Western Park	South Oxfordshire	3,300	2011/12	9	204	232	392	237 2	274 7	78														
Oakley Vale	Corby	3,100	2001/02	35	68	289	258	346 4	487 5	520 23	233 174	4 159	6 107	96 2	103	2	40	6	2					
Kings Hill	Tonbridge and Malling	3,024	26/9661	140	140	140	140	140	126 2	219 10	104 23	237 166	6 281	300	0 224	4 93	22	90	84	801	16	74	14	31
North West Cambridge	Cambridge and South Cambridgeshire	3,000	2016/17	73																				
West of Waterloo	Havant and Win- chester	3,000	2009/10	38	F	30	85		132	196	241													
Cranbrook	East Devon	2,900	2012/13	187	419	356	588	214	241															
West of Kempston	Bedford	2,760	2010/11	52	102	44	1 291	124	175	103 93	8													
South of the M4	Wokingham	2,605	2012/13	37	175	56	59	7 991	419															
Winterstoke Village	North Somerset	2,550	2014/15	132	185	242	191																	
Emersons Green East	South Gloucestershire	2,550	2014/15	274	197	318	280																	

Sife name	Local Planning	Site	Year of first		Year	Year	Year	Year	Year	Year	Year Year	ar Year	r Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year
	Authority	size	housing	-	N	m	Н	П	П	1	1			2	2	4	12	9	4	8	<u>0</u>		ZI	22
			сотрієпол										Dwelli	Dwellings per annum	mnu									
Land East Icknield Way	Test Valley	2,500	2009/10	184	257	103	181	132	7 622	146 18	184													
South Wokingham	Wokingham	2,490	2013/14	9	104	120	135	8																
North Wokingham	Wokingham	2,391	2010/11	28	66	23	0	92	112 6	31 99	154													
Broadlands	Bridgend	2,309	1999/2000	288	331	307	193	204	9 951	64 10	104 91	78	≅	20	147	=								
Western Riverside	Bath and North East Somerset	2,281	2011/12	29	147	93	19	163	154 4	45														
Arborfield Garrison	Wokingham	2,225	2016/17	22	114																			
Charlton Hayes, Northfield	South Gloucestershire	2,200	2010/11	83	87	163	333	281	193	301	891													
Clay Farm/ Showground Site (Greaf Kneighton)	Cambridge	2,169	2012/13	91	265	399	153	467																
Chapelford Urban Village	Warrington	2,144	2004/05	211	214	991	262	224	141 31	31 081	183 247	09 2	091	99	8									
Ledsham Garden Village	Cheshire West and Chester	2,000	2016/17	4	06																			
Graven Hill	Cherwell	1,900	2016/17	_	28																			
Elvetham Heath	Hart	1,869	2000/01	192	300	297	307	287	238 (103	9 681													
Hunts Grove	Stroud	1,750	2010/11	2	87	901	80	28	7 2	2 2	22													
Dickens Heath	Solihull	1,672	86/2661	2	621	961	161	207	88	124 6	64 249	9 174	91	96	011	4	0	0	ខ	01	26	12	96	
Red Lodge	Forest Heath	1,667	2004/05	65	93	181	62	22	9 62	101 19)I 2I3	101	78	23	75	=								
South West Bicester (Phase I Kingsmere)	Cherwell	1,631	2011/12	04	107	133	179	210	231	961														
Centenary Quay	Southampton	1,620	2011/12	102	28	103	137	257	8															
Northumberland Park	North Tyneside	1,513	2003/04	54	194	IZI	93	179	9 001	69	96 211	53	82	64	98									
Parc Derwen	Bridgend	1,500	2010/11	8	103	134	201	661	187	31 251	981													
Jennet's Park	Bracknell Forest	1,500	2007/08	153	154	145	891	136	179 2	235 9	93 37	0	28											
Melton Road	Rushcliffe	1,500	2016/17	40	126																			
Great Denham	Bedford	1,450	data only avalibale from 2009/10	92	150	159	12	122	150	125 211	11.	m												
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	981	336	302	216	09	108 5	59 85													
South Maldon Garden Malden Suburb	Malden	1,428	2017/18	_																				

Site name	Local Planning	Site	Year of first	Year	Year	Year	ar	Year	Year Yo	Year	Year Year	ar Year	r Year		Year									
	Authority	size	housing	_	2	ဗ	4			٦				2	23	4	15	91	17	8	61		21	22
			completion										Dwelli	Dwellings per annum	unu									
Bolnore Village	Mid Sussex	1,358	2012/13	30	54	88	73	36	124															
Park Prewett Hospital	Basingstoke and Deane	1,341	66/8661	28	82	37	102	0	0	0	0	307	214	219	146	33	34	26	7	30	91			
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	4	64	28 12	155 10	103 49	02	29	138	06									
Oxley Park (East & West)	Milton Keynes	1,300	2004/05	52	991	295	202	3 31	16	91 92	163													
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	381	84 3:	33 24	4													
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	16	47	81	100	59 12	43	64	09	101										
Staynor Hall	Selby	1,200	2005/06	12	4	115	<u>_</u>	43 (62 4	46 59	9 79	162	79	34	20									
Picket Twenty	Test Valley	1,200	2011/12	147	178	180	9/1	164	145 17	175														
Trumpington Meadows	Cambridge and South Cambridgeshire	1,200	2012/13	141	143	29	001	94																
Broughton (Broughton & Atterbury)	Milton Keynes	1,200	2003/04	4	105	0/1	409	204	31 081	8														
Orchard Park	Cambridge	1,120	2006/07	001	290	148	103	95	56 3	34 15	5 75	39	30	2										
Velmead Farm	Hart	1,112	06/6861	_	104	193	68	<u> </u>	52 10	101	3 130	4	102	48	4									
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	29	47	102	157																	
Zones 3 to 6, Omega South	Warrington	001'1	2017/18	15																				
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	911																	
Highfields Farm	South Derbyshire	1,056	2016/17	141	204																			
Monksmoor Farm	Daventry	1,000	2013/14	9	65	86	128	122																
Northampton North of Whitehills SUE	Daventry	1,000	2016/17	801	001																			
Taylors Farm/Sher- field Park	Basingstoke and Deane	166	2004/05	26	79	8	98	88	21	143 141	88	6	75	0	입									
Queen Elizabeth II Barracks	Hart	972	2012/13	56	165	011	228	213	96															
Little Staniton	Corby	970	2009/10	901	911	74	121	102	93 8	98 68	6 26													
North of Popley	Basingstoke and Deane	951	2007/08	65	57	91	28	0	0	118	8 84	09												
Ingress Park	Dartford	950	2002/03	184		275	001	74 (0	0 611														
Nar Ouse Millenium Commuity	Kings Lynn and West Norfolk	006	2007/08	32	77	0	0	0	0	30 22.	5 22	.5 68	0											
West Park	Darlington	893	2004/05	09	104	86	99	69	19	35 10	91 (21	32	28	4	45								
South Bradwell	Great Yarmouth	850	2015/16	60.3	60.3	60.3																		

Site name	Local Planning	Site	Year of first	Year	Year	Year	Year	Year	Year	Year	Year Y	Year Ye	Year Year	ar Year	r Year	r Year	Year	Year	Year	Year	Year	Year	Year	Year
	Authority	size	housing	_	2	2	4	┪		1	_		- 1	12	<u>e</u>	╡	┪	_	2	<u></u>	6	20	2	22
			completion										Dwel	Dwellings per annum	mnuu									
Prospect Place	Cardiff	826	2007/08	185	48	0	0	0	0	0	192	021												
Abbotswood	Test Valley	800	2011/12	30	061	157	4	152	06	20														
Dowds Farm	Eastleigh	795	2006/07	54	189	187	4		47 6	2 99	76	30												
Land at Popley Fields/ Mamell Park	Basingstoke and Deane	751	2006/07	105	172	<u>8</u>	981	126	4															
Hungate	York	720	2009/10	90	52	=	б	7		_	8 281													
Northside	Gateshead	718	1999/2000	46.8	46.8	46.8	46.8	46.8	26 4	46.8 4	46.8 4	46.8 46	46.8 46.8	91 8:	30	3	33	25	43					
Land at West Blyth	Northumbeland	705	2008/09	6.25	6.25	6.25	6.25	32	99	21	7 721	78 90												
Rowner Renewal Project	Gosport	700	2010/11	4	001	70	45	68	101	8 62	97													
Channels - North Chelmsford	Chelmsford	700	2015/16	31	172	9																		
The Parks, formally Staff College	Bracknell Forest	269	2006/07	-94	104	88	101	54	7 47	72 6	29 9	94 78	8											
Staiths South Bank	Gateshead	299	2003/04	24	28		44		48															
Land south of Wansbeck General Hospital	Northumberland	644	2005/06	18.7	18.7	18.7	18.7	18.7	18.7	.I 2.8I	2 2	24 37	09 2	22	54									
Former Pontins Holiday Camp	Lancaster	626	2006/07	91	22	4	വ																	
Ochre Yards	Gateshead	909	2004/05	83	68.2	68.2	68.2	68.2	68.2		4	46 4	25	8										
Former Runwell Hospital	Chelmsford	575	2016/17	16	90																			
Land adjoining Man- chester Ship Canal	Trafford	550	N/A																					
Pamona Docks	Trafford	546	A/A																					
Thingwall Lane	Knowlsey	525	2013/14	79																				
St. James Village	Gateshead	518	2000/01	41.4	41.4	41.4	41.4	41.4	41.4	41.4 4	41.4 4	41.4 41	41.4 14	13	81	15								
University Campus Chelmsford	Chelmsford	507	2014/15	216	ო																			
Land at Siston Hill	South Gloucestershire	504	2006/07	77	211	96	63	57																
Land West of Copthorne	Mid Sussex	200	N/A																					

Sources for sites also found in the Letwin Review

Arborfield Gre Garrison)	en (Arborfield	Five Year Housing Land Supply Statement and appendix on Strategic Development Locations at 31st March 2018 published 9th October 2018 http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/	
Ledsham Gard	len Village	Various Housing Land Monitor Reports https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/	
Great Kneighte	on (Clay Farm)	Partly provided by Cambridgeshire County Council and included in numerous AMR's https://www.cambridge.gov.uk/annual-monitoring-reports	
Trumpington N	Meadows	Included in numerous AMR's for Cambridge and South Cambridgeshire (site crosses boundaries)	
		https://www.cambridge.gov.uk/annual-monitoring-reports and https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/	
Graven Hill		Various Annual monitoring reports	
		https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports	
South West Bi	cester	Various Annual monitoring reports	
(Kingsmere Ph	nase I)	https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports	
Great Western	Park	Housing Land Supply Statement April 2018	
		http://www.southoxon.gov.uk/sites/default/files/30.04.20I8%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf	
Ebbsfleet:		First phase at Springhead Park and Northfleet South from Gravesham AMR's 2009/I0 to 2012/I3	
2009-10:		127 completions	
		https://www.gravesham.gov.uk/data/assets/pdf_file/0010/69823/AMR2010.pdf	
	2010-11:	79 completions	
		https://www.gravesham.gov.uk/data/assets/pdf_file/0010/69814/AMR20II.pdf	
	2011-12:	55 completions	
		https://www.gravesham.gov.uk/data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-20II-I2-May-20I3.pdf	
	2012-13:	50 completions	
		https://www.gravesham.gov.uk/data/assets/pdf_file/00I0/92449/Gravesham-Authority-Monitoring-Report-20I2-I3-interim-May-20I3.pdf	
	2013/14:	87 dwellings, based on total completions form Gravesham to 2012/13 of 311 and total completions to the start of 2014/15 in the Ebbsfleet Garden City Latest Starts and Completion Figures totalling 398.	
	2014/15 to 2017/18:	Ebbsfleet Garden City Latest Starts and Completion Figures: https://ebbsfleetdc.org.uk/tracking-our-performance/	

Appendix 3: Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Horfield Estate Phase I	Bristol City Council	485
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery	Wigan	471
Farington Park, east of Wheelton Lane	South Ribble	468
Bleach Green	Gateshead	456
Kingsmead South	Milton Keynes Council	450
New Central	Woking Borough Council	445
Land at former Battle Hospital	Reading Borough Council	434
New World House	Warrington	426
Radyr Sidings	Cardiff	421
Luneside West	Lancaster	403
Woolley Edge Park	Wakefield	375
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	365
Former NCB Workshops (Port- land Park)	Northumberland	357
Chatham Street Car Park Complex	Reading	307
Kennet Island Phase I - H, M, T, UI, U2	Reading	303
Land at Dorian Road	Bristol, City of	300
Land at Fire Service College, London Road	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Long Marston Storage Depot Phase I	Stratford-on- Avon	284
M & G Sports Ground, Golden Yolk and Middle Farm	Tewkesbury	273
Land at Canons Marsh	Bristol, City of	272
Land off Henthorn Road	Ribble Valley	270
Land Between A4I9 And A4I7	Cotswold	270
Hortham Hospital	South	270

Site Name	Local Planning Authority	Size
GCHQ Oakley - Phase I	Cheltenham	262
Hewlett Packard (Land Adjacent To Romney House)	Bristol, City of	242
I28-I34 Bridge Road And Nos I - 4 Oldfield Road	Windsor and Maidenhead	242
Hoval Ltd North Gate	Newark and Sherwood	196
Notcutts Nursery, I50 - I52 London Road	Cherwell	182
Sellars Farm	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton, Milton Keynes	Milton Keynes	176
Queen Mary School	Fylde	169
London Road/ Adj. St Francis Close	East Hertford- shire	149
Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	145
Bracken Park, Land At Cor- ringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
North of Douglas Road	South Glouces- tershire	131
Land to the east of Efflinch Lane	East Staffordshire	130
Land to the rear of Mount Pleasant	Cheshire West and Chester	127
Primrose Mill Site	Ribble Valley	126
Kennet Island Phase IB - E, F, O & Q	Reading	125
Land between Godsey Lane and Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Land west of Birchwood Road	Bristol, City of	119
Former Bewbush Leisure Centre Site	Crawley	112
Land south of Station Road	East Hertford- shire	111
Poppy Meadow	Stratford-on- Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	96
North East Sandylands	South Lakeland	94

Site Name	Local Planning Authority	Size
Auction Mart	South Lakeland	94
Parcel 4 Gloucester Business Park	Tewkesbury	94
York Road	Hambleton	93
Land At Green Road - Reading College	Reading	93
Caistor Road	West Lindsey	89
The Kylins	Northumberland	88
North East Area Professional Centre, Furnace Drive	Crawley	76
Land at Willoughbys Bank	Northumberland	76
Watermead, Land At Kennel Lane	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site)	West Lindsey	69
Land off Crown Lane	Wychavon	68
Former Wensleydale School	Northumberland	68
Land at Lintham Drive	South Glouces- tershire	68
Springfield Road	South Kesteven	67
Land off Cirencester Rd	Stroud	66
Land south of Pinchington Lane	West Berkshire	64
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School	Cherwell	60
Land at the Beacon, Tilford Road	Waverley	59
Land to Rear Of 28 - 34 Bedale Road	Hambleton	59
Hanwell Fields Development	Cherwell	59
Fenton Grange	Northumberland	54
Former Downend Lower School	South Glouces- tershire	52
Holme Farm, Carleton Road	Wakefield	50
Land off Elizabeth Close	West Lindsey	50

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