

# **EiP Statement**

## **St Helens Delivery and Allocations Local Plan**

### **Taylor Wimpey UK Limited**

#### **Representator ID RO1154**

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**Our ref** 41874/04/CM/BOC  
**Date** 28 May 2021

#### **Subject Matter 5 - Housing Land Supply**

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### **1.0 Introduction**

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [TW] to make representations on its behalf to the St Helens Borough Local Plan 2020-2035 [SHLP].
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 5 Examination in Public [EiP] hearing session.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 1 - Introduction to the Hearings, Legal Compliance, Procedural Requirements, and the Duty to Cooperate
  - 2 Matter 2 - Housing and Employment Needs and Requirements
  - 3 Matter 3 – Spatial Strategy and Strategic Policies
  - 4 Matter 4 - Allocations, Safeguarded Land and Green Belt Boundaries
  - 5 Matter 7 - Specific Housing Needs and Standards
  - 6 Matter 9 - Generic Policies
  - 7 Matter 10 - Infrastructure and Delivery
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the SHLP [Representator ID RO1154] as well as those made on other Matters listed above.
- 1.5 TW is seeking to bring forward a high quality, well designed and sustainable strategic residential site at Gartons Lane, St Helens [Local Plan Site Reference: 5HA] and a site at Gorse Lane, St Helens which forms part of the wider Bold Forest Garden Suburb [Local Plan Site Reference: 4HA]. Taylor Wimpey is supportive of the allocation of the sites in the SHLP and considers that the identification of both sites as residential allocations will assist in boosting the supply of housing in St Helens. It will also assist in delivering sustainable development by contributing towards meeting the needs of market and affordable housing, creating employment during the construction period and mitigating any impact on the environment.
- 1.6 This statement expands upon TW's previous representations made throughout the Local Plan preparation process in light of the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National

Planning Policy Framework [the Framework] and the National Planning Practice Guidance [Practice Guidance].

## **2.0 Planning Issues**

### **Issue 1: Components of Housing Supply**

*3. Is the small sites allowance of 93 dpa justified by compelling evidence (see paras 4.10-4.13) of SD025)?*

2.1 The Council has set out its justification for a small sites allowance of 93 dpa in its Housing Need and Supply Background Paper (October 2020). Table 4.4 within that document demonstrates that over the 10-year period 2010/11-2019/20, the average completion rate from small sites (i.e. below 0.25 ha in size) was 103 units per annum. The supporting text states that the highest level of small sites delivery occurred in year 2018/19, due to a high number of apartment schemes being delivered (including Tolver House, Hardshaw, the former Tyrers department store). The high annual delivery must therefore be framed in the context of recent government changes to the planning system, specifically changes to permitted development rights allowing the conversion of offices to residential development. This has boosted the supply of units being delivered on smaller sites, albeit it is likely that the most suitable sites for conversion from office to residential will already have been taken.

2.2 The Council has included an allowance in their delivery trajectory for 93 units per annum which is based on the long term trend of past delivery as recorded in the 2017 SHLAA (and thus removes the 196 units delivered in 2018/19 from the calculation). Ordinarily Taylor Wimpey would not support the inclusion of a windfall allowance in Years 1 and 2 of the housing trajectory to avoid double counting. However in this instance, as the Council has identified 135 small sites with planning permission to deliver 486 units and excluded it from the supply, instead relying on a windfall allowance of 93 units per annum based on long term trends, it is deemed appropriate.

*5. Should empty homes be included as a component of supply?*

2.3 St Helens Council has not included an allowance for empty homes being returned in their supply trajectory and Taylor Wimpey is supportive of this approach. In any normal housing market, there will always be an element of the stock which is vacant and the Council has little direct influence on landowners decisions. In terms of incorporating empty homes into the Council's supply trajectory, the Practice Guide<sup>1</sup> is clear that when making an allowance for empty homes, Councils must ensure that empty homes had not already been counted as part of the existing stock of dwellings to avoid double counting. The Council has not presented any evidence which supports the incorporation of an allowance for empty homes as part of their supply.

2.4 Coupled with that, the latest available data in 2019<sup>2</sup> indicated that there are 83,343 dwellings in St Helens of which 2,497<sup>3</sup> are vacant (3% of the stock) but only 852 constitute long term vacant (more than 6 months) (1% of the stock). As such, the overall proportion of vacant stock available in St Helens is not significant and an allowance would not be appropriate.

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<sup>1</sup> Practice Guidance Ref ID: 68-030-20190722

<sup>2</sup> MHCLG Live Table 100

<sup>3</sup> MHCLG Live Table 615

2.5 Furthermore, the Council has not put a strategy in place to assist in incentivising the bringing back into use the long-term empty homes above standard measures. As such, it would not be appropriate to rely on empty homes to form a reliable component of supply over the plan period particularly given the relatively low proportion of empty homes.

*6. Does the Plan show sufficient flexibility in the supply to ensure that the housing requirement will be met over the Plan Period?*

2.6 Taylor Wimpey is of the opinion that the Plan shows an appropriate level of flexibility to ensure that the housing requirement will be met over the plan period based on the current housing requirement. Providing flexibility in a Plan's housing supply is a reasonable approach as delivery on sites can often be delayed for a variety of reasons which could impact on the overall supply within the plan period. For instance, construction sites were closed for a period in 2020 and supply chains have been affected by Brexit and issues with global trade routes this year.

2.7 Based on the evidence presented in Updated Employment and Housing Land Supply Position as of 31.03.2021, the Council has identified a potential housing supply of 7,831 against a residual requirement to the end of the plan period (2037) of 7,132 which represents a flexibility allowance of 9.8% (699 units). Taylor Wimpey supports the provision of this flexibility but would urge that this should not be eroded or reduced to ensure that the Council's housing requirement is met over the longer term.

*7. Is the flexibility in housing supply provided by the Green Belt sites justified?*

2.8 Policy LPA05 sets out that the housing requirement over the plan period should be '*at least 486 dwelling per annum*'. It does not set the housing requirement as a maximum figure and Taylor Wimpey supports this approach. To meet the tests of soundness as set out in the Framework [§ 35] and to be considered positively prepared, the strategy should '*as a minimum, seek to meet the area's objectively assessed needs*'.

2.9 As set out in our response to Q.6, Taylor Wimpey supports the flexibility being allowed in the Plan and considers that the approach is sound particularly given the delays that can be experienced on sites from time to time. Allowing a small element of flexibility in the supply, particularly when the Council has included a sizeable allowance for unidentified windfall sites (1,395, or 93 dpa over the remaining 15 years of the Plan), is the correct approach to take in this instance.

2.10 Given the tightly drawn Green Belt boundaries in St Helens and lack of sufficient supply to meet the identified housing need otherwise, it is considered that exceptional circumstances exist to remove land from the Green Belt for development purposes. With this in mind, flexibility in the housing supply can only be provided through the release of additional Green Belt land. However, it is considered that a 9.8% flexibility is not significant in the context of the Plan and is a justified and appropriate allowance.

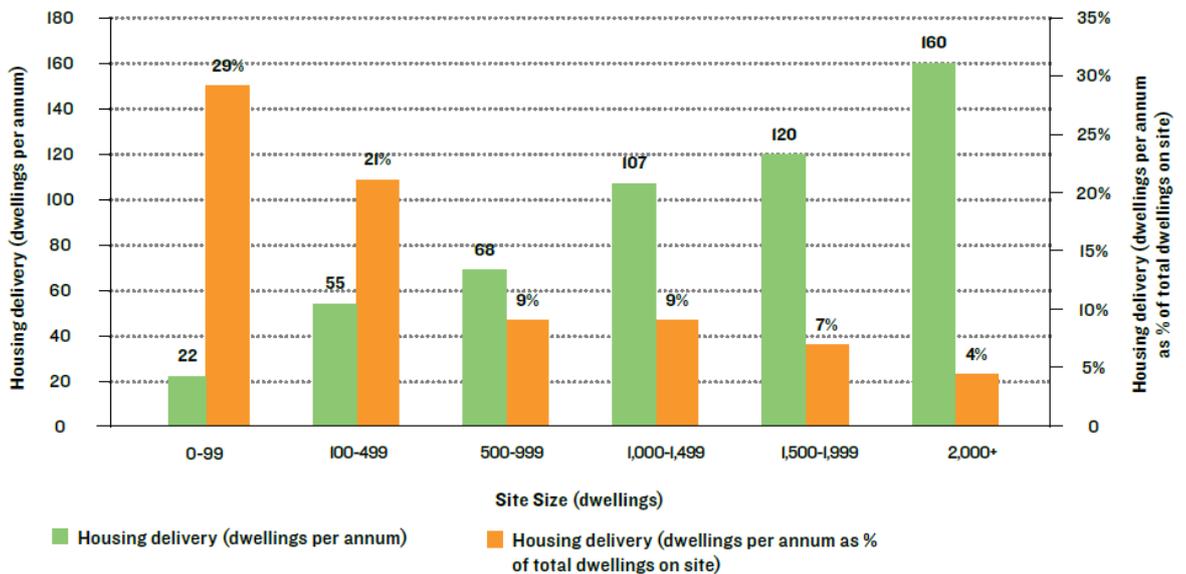
## **Issue 2: The Housing Trajectory**

*9. Is the evidence that supports the Housing Trajectory based on realistic assumptions?*

2.11 On 12<sup>th</sup> May 2021, the Council released an Updated Employment and Housing Land Supply Position as of 31<sup>st</sup> March 2021 in advance of the Examination Hearings. This superseded the content of Appendix 1 of SDO25 and we have answered the Inspector's questions based on this updated information.

- 2.12 Taylor Wimpey is generally supportive of the assumptions used by the Council in deriving their housing trajectory but would express a degree of caution in relation to some large-scale sites where complex issues need to be addressed. Further detailed views are provided on the assumptions used in the answers to the subsequent questions.
- 10. (a) In particular, should a lapse rate be applied to sites expected to deliver in the next 5 years as well as those delivering later in the Plan period?*
- 2.13 It is acknowledged that the Council has applied a lapse rate of 15% on all SHLAA sites over the years 6-15 of the plan inclusive of sites with planning permission and Taylor Wimpey considers that this is a reasonable approach and size of lapse rate. Sites can be delayed or simply do not come forward as expected for a number of reasons and adopting a pragmatic approach is required to ensure that sufficient land is available across the Plan period to ensure a demonstrable supply of housing land. This is particularly the case on sites which do not benefit from an extant planning permission which comprises most of the site included in the 6-15 year trajectory.
- 2.14 In this instance, given the evidence provided by the Council in relation to their claimed delivery within the first 5 years of the plan, Taylor Wimpey considers that not applying a lapse rate for the first 5 years is appropriate. Of the Council's supply within the first 5 years of 2,362 dwellings, 1,322 already have planning permission and in the context of the Framework are considered deliverable unless specific evidence is available to indicate otherwise. Whilst another 465 units are derived from the small sites allowance. Therefore, only 575 units from the claimed 5-year supply do not benefit from planning permission and these sites are all Local Plan Allocations in the urban area on proposed allocations. It is requested that additional information is provided by the Council to demonstrate that these sites are deliverable in the first 5 years of the plan.
- 10. (e) Are lead in times and build out rates realistic?*
- 2.15 The Council's assumptions on lead in times and build out rates are included in the Council's *Housing Need and Supply Background Paper* (October 2020) and are consistent with the approach taken in the SHLAA methodology. Taylor Wimpey is of the opinion that the lead-in times assumed (Table 4.5) are a little simplistic and where site specific developer information is not available, different lead-in times should be applied depending on the size of the site.
- 2.16 Larger sites often take longer to come forward for a variety of reasons and in the absence of site-specific information available from a developer, more cautious build out rates should be applied in accordance with the findings of Lichfields' *Start to Finish 2 Planning Insight* (February 2020) (Attached at Appendix 1 and overleaf). This Planning Insight demonstrates the length of time experienced on a wide variety of sites across the country to come forward and commence delivery of units. Its findings provide robust evidence in the absence of site-specific information.

Figure 7: Build-out rate by size of site (dpa)



Source: Lichfields analysis

- 2.17 In relation to build out rates, Taylor Wimpey is of the opinion that more ambitious delivery rates could be achieved on some of the larger sites. The Council assumes that 45 units a year would be delivered on sites of over 250 units but Taylor Wimpey considers that their site at Gartons Lane can deliver in excess of this and would advocate the trajectory is increased to make an allowance of at least 55 dpa (as per the findings of Lichfields' *Start to Finish* research above). Taylor Wimpey is experiencing similar delivery rates on a number of their sites in the North West and consider it imminently achievable.
- 2.18 Furthermore, in relation to the Bold Forest Garden Suburb, although there is a requirement to achieve a comprehensive masterplan for the site in advance of any planning permission being approved, Taylor Wimpey is of the opinion that allowing 7 years for the completion of the first unit is overly cautious and could come forward much sooner. Coupled with that, given the size of the site and the likelihood that the development would be constructed in a bookended manner with multiple outlets, a rate much higher delivery than 60 units per year could be achieved. Lichfields research (Appendix 1 and Figure 7 excerpt above) on sites of this scale (over 2,000 dwellings in size) typically achieved a mean average of 160 dpa and it is considered this site could achieve a similar delivery rate.
10. (f) *Is the significant spike in delivery shown in delivery shown in the trajectory between 2025/26 and 2026/27 realistic and supported by evidence?*
- 2.19 The spike in the Council's delivery trajectory is predominantly due to the commencement of delivery of units on the sites which are to be released from the Green Belt. Taylor Wimpey considers that the spike in delivery is realistic in this instance given the likelihood that a number of developers will submit planning applications on the sites proposed to be released from the Green Belt as soon as the Plan is adopted.

**Issue 3: Five Year Housing Land Supply**

*11. Is the use of a 5% buffer to calculate the housing land supply position appropriate?*

2.20 The Framework [§73] sets out that the supply of specific deliverable sites should include a buffer of 5% to ensure choice and competition in the market for land or a 20% buffer where there has been significant under-delivery of housing over the previous three years.

2.21 St Helens has performed well in terms of completion rates consistently over the past number of years delivering more than the proposed housing requirement on 6 of the past 7 years. In particular, cumulative delivery over the past 3 years (1,941 units) is well in excess of proposed housing requirement for that period (1,458 units), a surplus of 483 units. The Council's Housing Delivery Test score is 145% and with this in mind, applying a 5% buffer to the council's five-year housing land supply is appropriate.

*12. Is the inclusion of 465 units from small sites in the 5-year supply justified?*

2.22 As set out in the response to Q.3, Taylor Wimpey is of the opinion that the inclusion of an allowance of 465 units from small sites over the first 5 years is appropriate and justified particularly bearing in mind that the Council has excluded 468 units from 135 small sites to avoid double counting.

*13. Generally, are the assumptions about the delivery from commitments, SHLAA sites and allocations within the 5-year supply realistic?*

2.23 Taylor Wimpey is of the opinion that its site at Gartons Lane could come forward earlier than the Council is predicting in their trajectory. Taylor Wimpey is planning to prepare a planning application for submission immediately upon adoption of the Plan. Taylor Wimpey controls the majority of the site with 3 small exceptions, with landowners currently in discussions with Taylor Wimpey. However, the delivery of the masterplan for the site does not require their inclusion. Assuming planning permission can be secured in a reasonable period of time, Taylor Wimpey is of the opinion that units could be delivered from the site by 2024/25 at a rate of approximately 55 dpa thereafter.

2.24 Similarly, Taylor Wimpey has freehold ownership of the Gorse Lane site and there is no impediment to its prompt delivery. The only restriction on the timing of the delivery is the requirement for it to be brought forward after a masterplan is agreed for the wider Bold Forest Garden Suburb. Taylor Wimpey is willing to contribute proportionately to all infrastructure requirement on the overall site and to deliver an unfettered access to the wider development area if its site is allowed to come forward sooner in the process to assist the Council in demonstrating a sufficient 5-year supply of land. Again, Taylor Wimpey could prepare and submit an application which demonstrates how it would assimilate with any future development of the wider site and commence delivery in 2024/25 at a similar rate to the Gartons Lane site of 55dpa.

*14. Are lead in times and build out rates within the 5-year supply realistic?*

2.25 As set out in our response to Q.10(e), Taylor Wimpey is of the opinion that the lead in times and build out rates proposed by the Council are overly simplistic and do not take account of the size of the site. In the event that realistic site-specific information is not available from developers, the Council should adopt lead in times and build out rates based on the findings of Lichfields' *Start to Finish 2* Planning Insight (February 2020).

- 2.26 In relation to build out rates, Taylor Wimpey is of the opinion that more ambitious delivery rates could be achieved on some of the larger sites which could also assist the Council in demonstrating a 5-year supply of housing land. The Council assumed rate of 45 units could be increased to at least 55 dpa on larger sites over 250 units and some elements of the Bold Forest Garden Suburb site, namely the Gorsey Lane site, could be brought forward earlier in the plan period without compromising the comprehensive delivery of the wider allocation at a similar rate of 55 dpa.
- 15. Are there any measures that the Council can take to provide more elbow room in terms of the 5-year supply?*
- 2.27 Taylor Wimpey is of the opinion that its sites at Gartons Lane could deliver some additional units above the number assumed in the Council's delivery trajectory. Taylor Wimpey is of the opinion that at least 55 dpa could be delivered on this site from 2024/25 onwards, thus delivering 110 units in the first 5 years of the adopted Plan. This represents an increase in the Council's claimed supply of 88 units.
- 2.28 In relation to Taylor Wimpey's site at Gorsey Lane, as mentioned earlier the site is in the freehold ownership of Taylor Wimpey and there is no impediment to its delivery. The Council has included this site within the wider Bold Forest Garden Suburb allocation and anticipates completions to come forward from 2030 onwards. Taylor Wimpey considers that its element of the site, which has direct access to Gorsey Lane, could be delivered much sooner than this and could bring forward a suitable and unfettered access to the wider area thus not conflicting with the requirement to deliver a comprehensive masterplan for the allocation. Should this approach be deemed acceptable, Taylor Wimpey could commence delivery on their site by 2024/25, delivering an additional 110 units within the first 5 years of the plan period. Therefore, Taylor Wimpey could directly deliver an additional 198 units towards the Council's 5-year housing land supply from these two sites.
- 16. Will there be a five-year supply of deliverable housing sites on adoption of the LP?*
- 2.29 The Council's latest position as set out in the Updated Employment and Housing Land Supply Position as of 31.03.2021, indicates that they have a 4.6-year supply of housing land which equates to a shortfall of 190 units. As set out in our response to Q.15, Taylor Wimpey considers that its site at Gartons Lane could come forward sooner than is being predicted by the Council in their delivery trajectory. Similarly, Taylor Wimpey's element of the Bold Forest Garden Suburb could come forward much sooner in the plan period and come forward as the first phase of the overall Garden Suburb without compromising the comprehensive delivery of the wider area. Taylor Wimpey would contribute proportionately to any infrastructure requirements for the overall allocation and provide an unfettered access to the remainder of the site. This could boost the Council's supply by approximately 198 units which would facilitate the Council demonstrating a 5YHLS.
- 2.30 Taylor Wimpey would be strongly against the introduction of staggered housing requirement purely with the purpose of conflating St Helens claimed housing land supply upon adoption of the Plan. St Helens has consistently experienced completions in excess of the proposed housing requirement over the past few years and reducing the housing requirement in the earlier part of the plan period would not assist in addressing worsening affordability issues in St Helens (the affordability ratio has increased from 5.08 to 5.45 since the base date of the Plan), the supply of affordable housing or address the immediate shortage of housing in the Borough.

**Issue 4: The wording of Policy LPA05**

*17. Will Policy LPA05 as worded be effective in maintaining delivery through the Plan period?*

- 2.31 Part 4(b) of Policy LPA05 sets out that, in the event that the Council's claimed supply falls significant below the required level, a partial or full review will be considered to bring forward additional sites. Taylor Wimpey is of the opinion that an alternative fallback position should be adopted through the introduction of a 'Plan B' policy which would allow safeguarded sites to come forward to boost supply in the event that the Council's housing land supply deteriorated.
- 2.32 Adopting a Plan B approach in policy would be a much quicker process to alleviate immediate housing supply issued rather than requiring a partial or full plan review which may take many years to adopt. Similar approaches have been taken in a number of authorities including nearby West Lancashire.

**Appendix 1:  
Lichfields' Start to Finish 2 Planning Insight  
(February 2020)**

**INSIGHT**  
**FEBRUARY 2020**

# Start to Finish

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

**SECOND EDITION**



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# Executive summary

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:

|   |   |
|---|---|
| <p><b>1 Large schemes can take 5+ years to start</b></p>  | <p><b>2 Lead-in times jumped post recession</b></p>   |
| <p>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.</p> | <p>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.</p>  |
| <p><b>3 Large greenfield sites deliver quicker</b></p>  | <p><b>4 Outlets and tenure matter</b></p>   |
| <p>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.</p>   | <p>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.</p> |

# Key figures

180

sites assessed, with combined yield of 213k+ dwellings; 97 sites had 500+ homes

c.3yrs

average time taken from outline decision notice to first dwelling completions on sites of 500+ homes

8.4yrs

the average time from validation of the first planning application to the first dwelling being completed on schemes of 2,000+ dwellings

160 dpa

the average annual build-out rate for a scheme of 2,000+ dwellings (median: 137)

68 dpa

the average annual build rate of a scheme of 500-999 dwellings (median: 73)

+34%

higher average annual build-out rate on greenfield sites compared with brownfield sites

61 dpa

average completions per outlet on sites with one outlet, dropping to 51 for sites of two outlets, and 45 for sites with three outlets

# 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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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

# O2

## 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 build-out 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

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#### Box 1: Letwin Review sites

1. Arborfield Green (also known as Arborfield Garrison), Wokingham
2. Ledsham Garden Village, Cheshire West & Chester
3. 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)

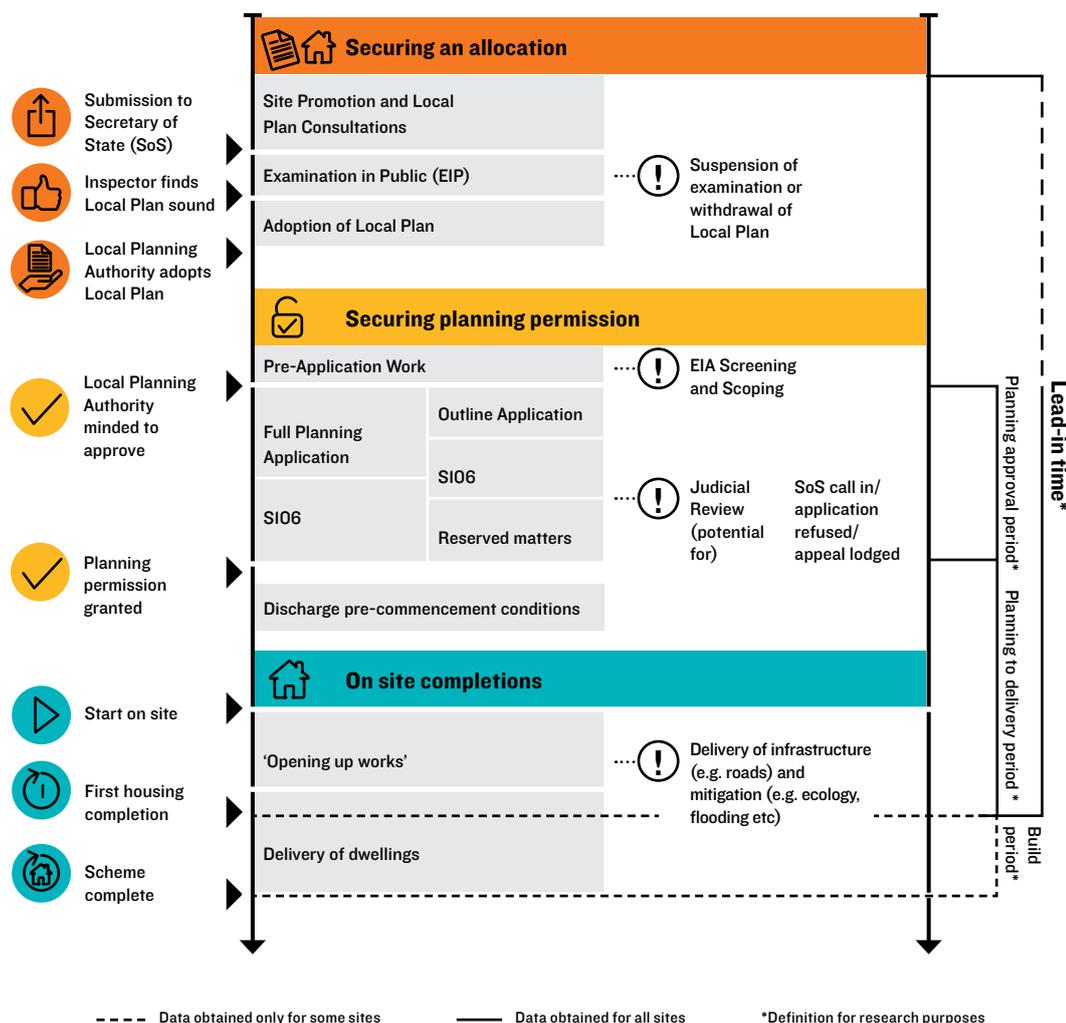
when it was difficult to obtain reliable data. The study therefore includes the Letwin Review's case studies listed in Box 1.

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:

1. Annual Monitoring Reports (AMRs) and other planning evidence base documents<sup>1</sup> 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
3. In a handful of instances obtaining/confirming the information from the relevant house builders.

Figure I: Timeline for the delivery of strategic housing sites



<sup>1</sup> 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

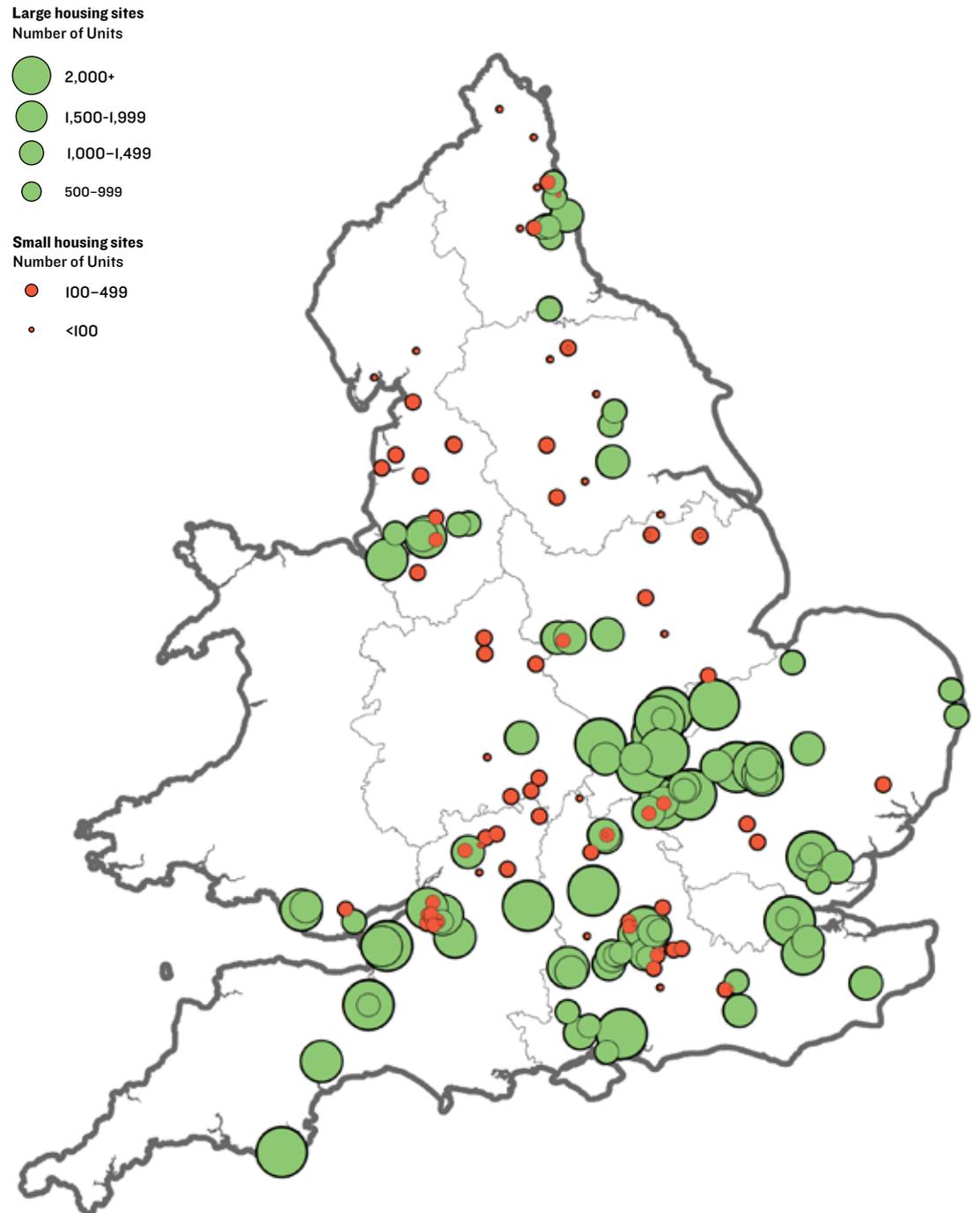
16,467

units on small sites  
under 500 homes

35

sites of 2,000  
homes or more

Figure 2: Map of site sample by size of site (total dwellings)



Source: Lichfields analysis

# 03 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)*

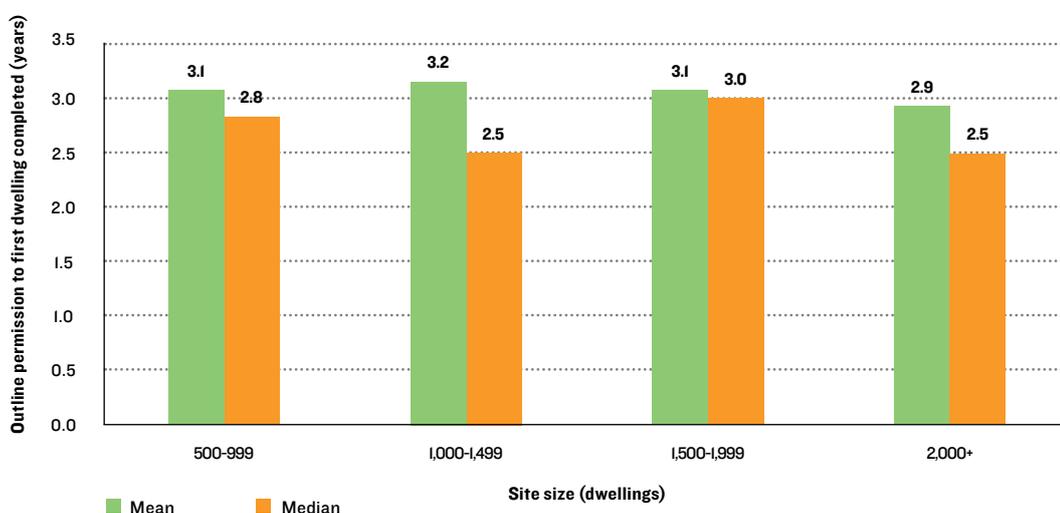
What constitutes 'clear evidence' was clarified in a number of early appeal decisions and in the Planning Practice Guidance<sup>2</sup> and can include information on progress being made towards submission of a reserved matters application, any progress on site assessment work and any relevant information 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



Source: Lichfeilds analysis

<sup>2</sup> 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 development<sup>3</sup>. 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 application<sup>4</sup> 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

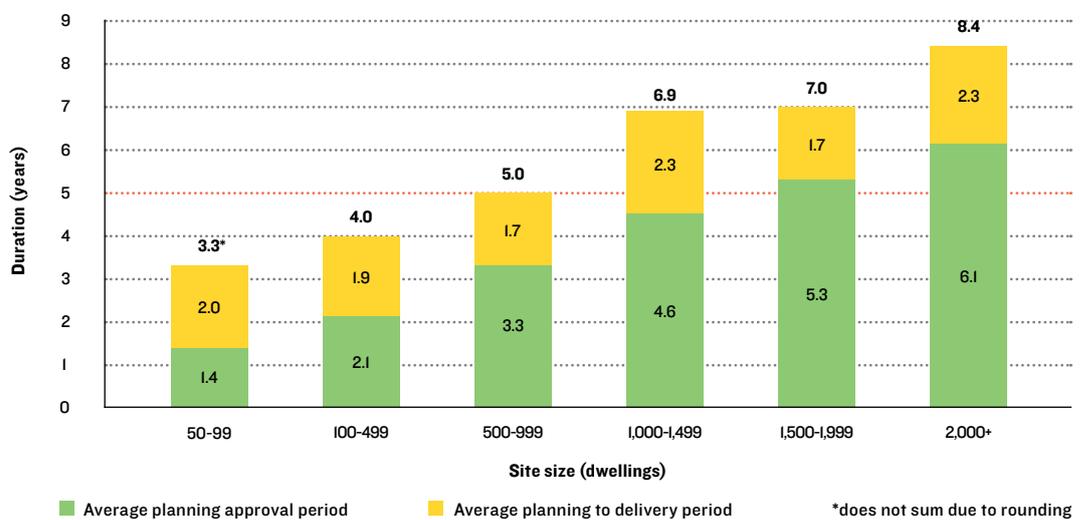
Our latest research reveals little difference between the average planning approval period by site size compared to the same analysis in the first edition (see Table 1). However, it is important to remember that these are average figures which come from a selection of large sites. There are significant 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 1: Average planning approval period by size of site (years)

| Site Size   | 1st 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

<sup>3</sup> Realising 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.

<sup>4</sup> The 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

## 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.

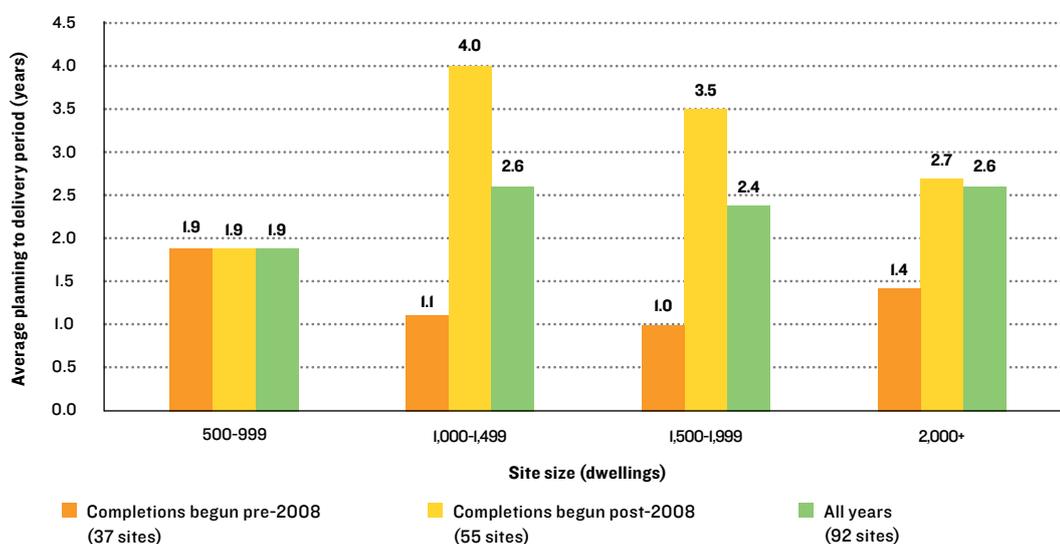
This is likely due to the inclusion of more recent proposed developments in this edition. Of the 27 new sites considered, 17 (63%) completed their first dwelling during or after 2012; this compares to just 14 (20%) out of 70 sites in the first edition of this research (albeit at the time of publication 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 delivery<sup>5</sup>, 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



Source: Lichfields analysis

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

<sup>5</sup> 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.

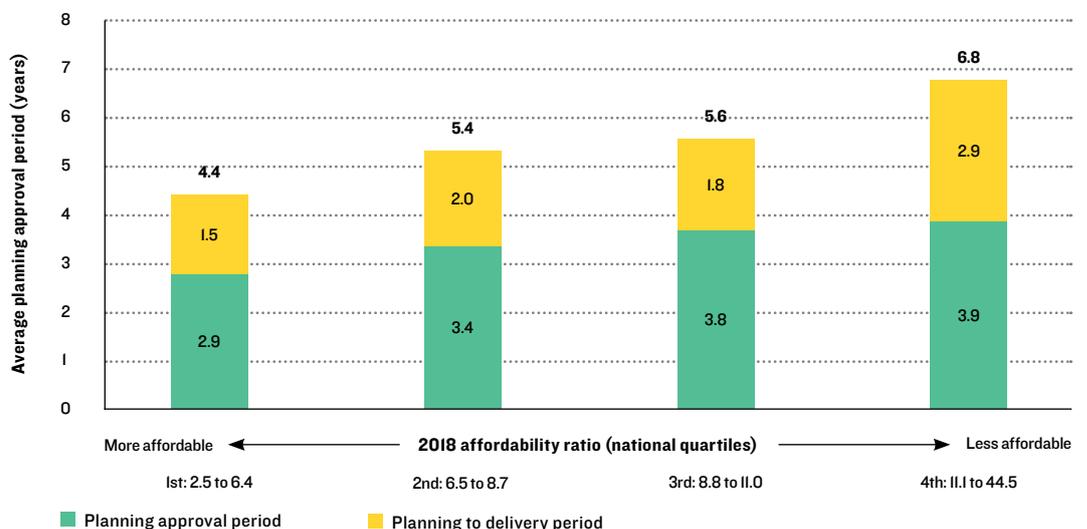
The above analysis coincides with the fact (Table 2) that sites in the most affordable locations (lowest quartile) tend to be smaller than those in less affordable locations (an average site size of c.1,150 compared to in excess of 2,000 dwellings for the three other quartiles). Even the least affordable 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             |
| 11.1 – 44.5                           | 2,079             |

Source: Lichfields analysis

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



Source: Lichfields analysis

# 04 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.

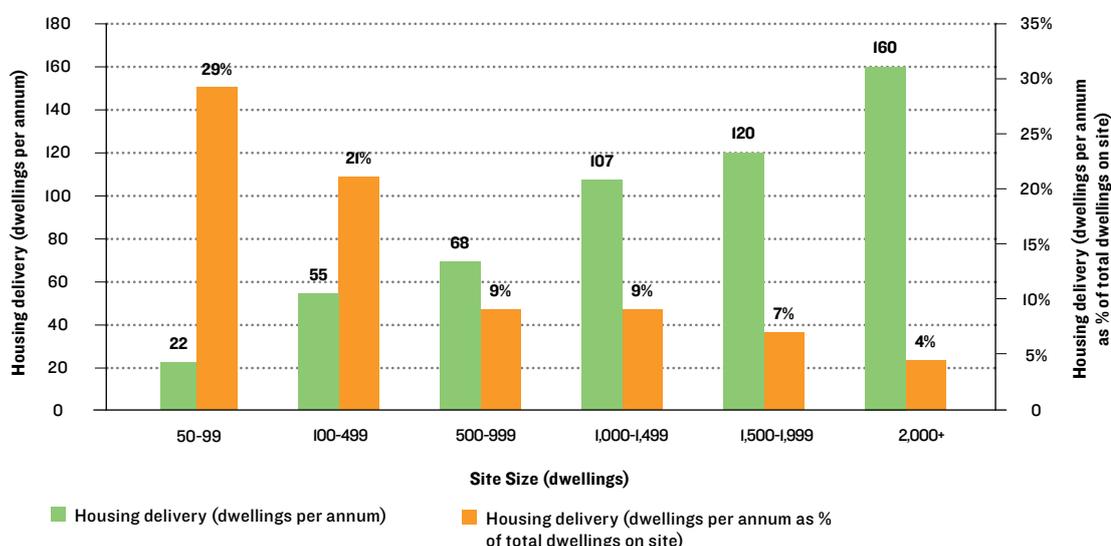
## Average Annual Build-out rates

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.

# 160 dpa

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

Figure 7: Build-out rate by size of site (dpa)



Source: Lichfields analysis

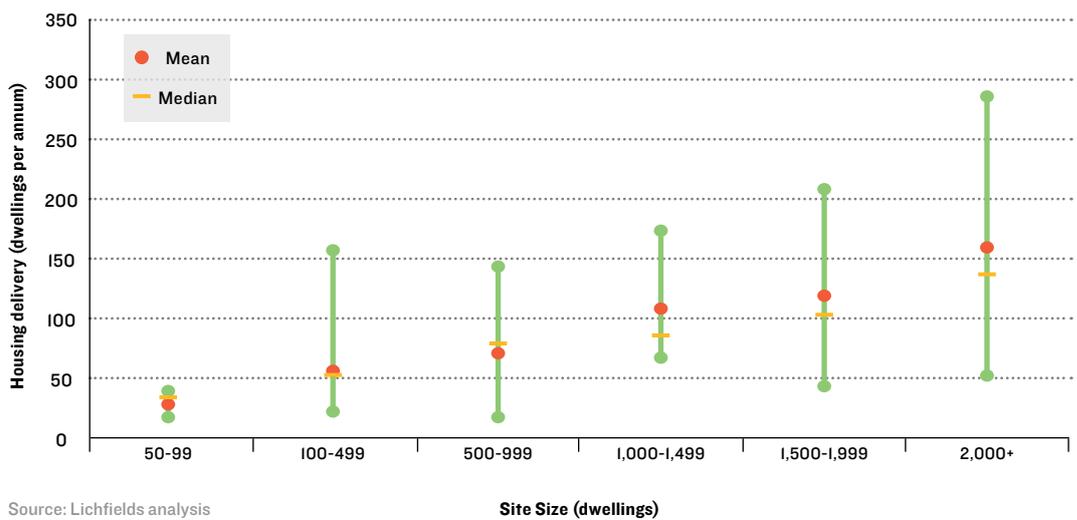


In most cases the median annual delivery rate is lower than the mean for larger sites.

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

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%   |

Source: Lichfields analysis

## 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                         | -1 (-0.62%) |

Source: Lichfields analysis

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

| Site                                  | Site size (dwellings) | Peak annual build-out rate (dpa) | Average annual 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 annum<sup>6</sup>. 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

Figure 9: Average build-out rate for sites over 2,000 homes by length of delivery period (dpa)



Source: Lichfields analysis

<sup>6</sup> This 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.

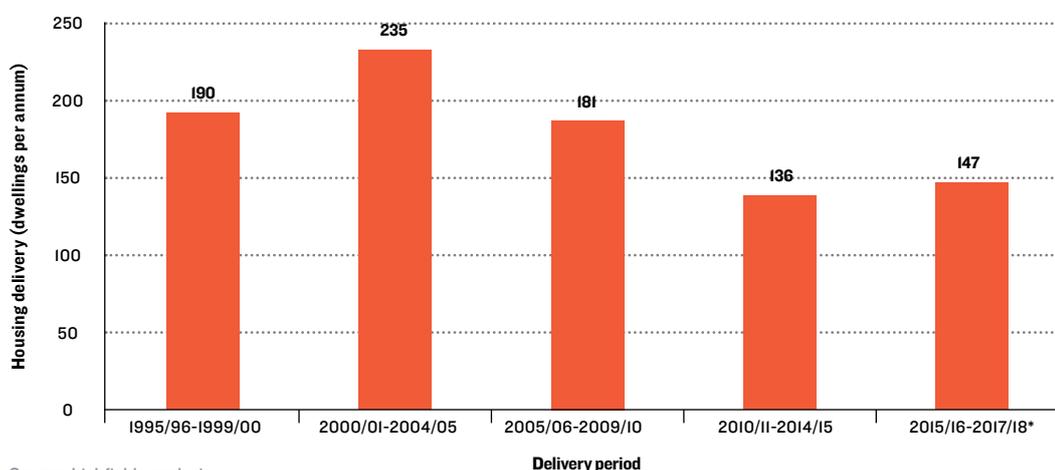
However, setting aside that stripping out the recession has a modest impact on the statistical averages for the sites in our sample, the more significant point is that – because of economic cycles - larger sites which build out over five or more years are inherently likely to coincide with a period of 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 10: Average build-out rate by five year period for sites over 2,000 dwellings (dpa)



Source: Lichfields analysis

# 05 What factors can influence build-out rates?

**+34%**

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

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.

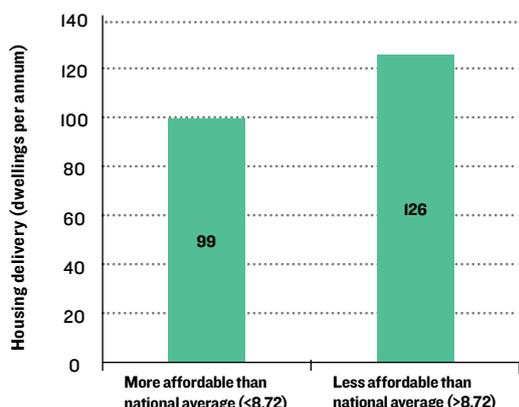
Our analysis also coincides with the fact that sites in less affordable areas are on average c.17% larger than those in more affordable areas. The average site size for schemes in areas where affordability is below the national average is 1,834 dwellings. For those delivered in areas where the affordability 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.

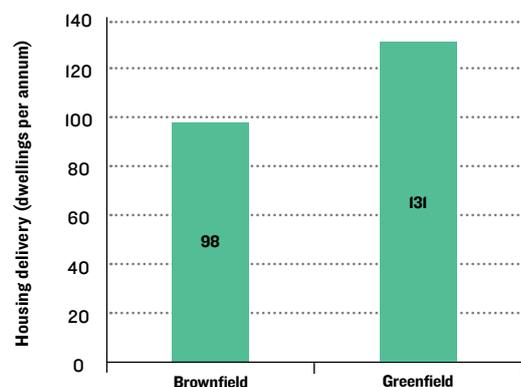
In the life cycle of a site, our data also shows that greenfield sites had shorter planning to delivery periods (2.0 years compared to 2.3 for brownfield sites), although on average, longer planning approval periods (5.1 years compared to 4.6 for brownfield sites).

Figure 11: Build-out rates by level of demand using national median 2018 workplace based affordability ratio (dpa)



Source: Lichfields analysis

Figure 12: Build-out rates on brownfield and greenfield sites (dpa)



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.

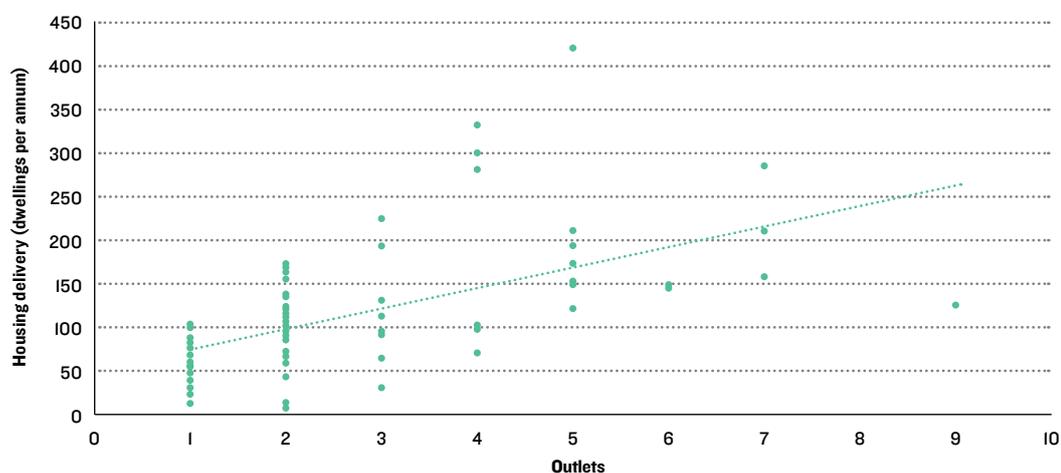
Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have used the number of sales outlets on a site as a proxy for variety of product. This gives the prospect of multiple house builders each seeking to build and sell homes for which 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"<sup>7</sup>. 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.<sup>8</sup>

Figure 13: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis



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

<sup>7</sup> Letwin Review draft analysis report (June 2018) - final bullet of para 4.25

<sup>8</sup> Average completions per outlet on site with one outlet was 61dpa, dropping to 51dpa 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  |
|------------------|--|-------------------------|
| SP1              | Bellway (1)                              | 59                      |
| SP2w             | Bellway and Bovis (-)                    | None - parcel completed |
| SP3              | Crest Nicholson (1)                      | 47                      |
| SP4              | Taylor Wimpey and David Wilson Homes (2) | 140                     |
| SP9_I            | Bloor, Bovis and Linden (3)              | 169                     |
| SPI0             | Darcliffe Homes (-)                      | None - parcel completed |
| SPII             | Taylor Wimpey (1)                        | 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.

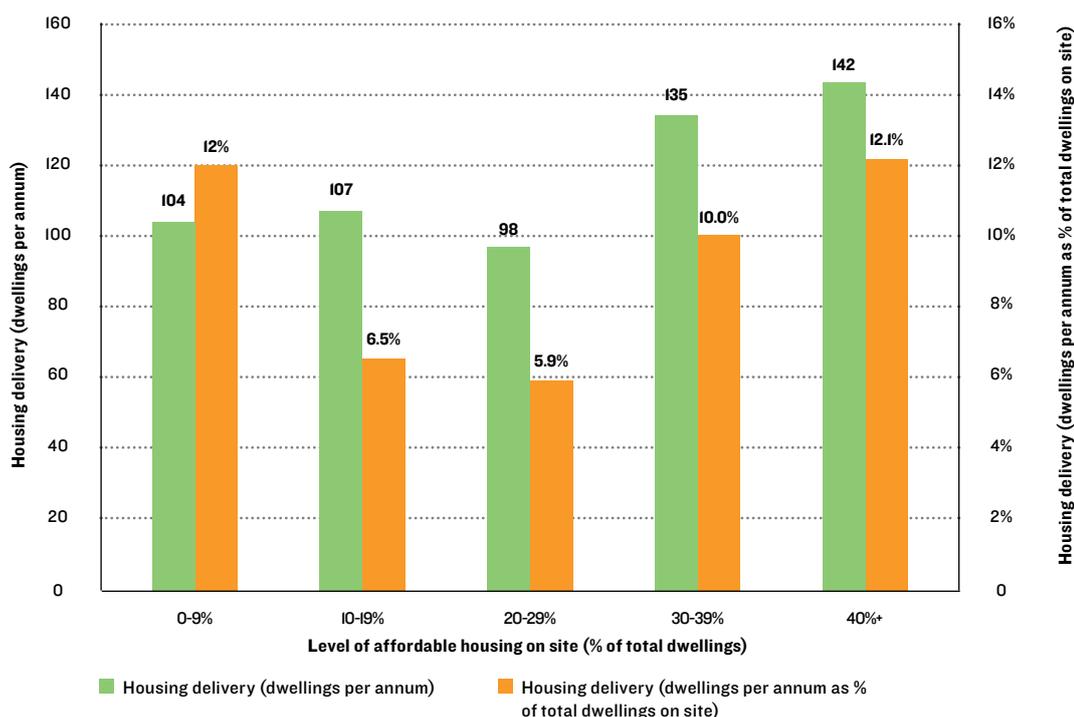
### Affordable choices: do different tenures provide more demand?

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

# 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 three-tier 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 longer-term 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 I6: Key questions for assessing large site build-out rates and delivery timelines



# 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 mid-point 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.









## Sources for sites also found in the Letwin Review

|   |  |
|---|--|
| Arborfield Green (Arborfield Garrison)  | Five Year Housing Land Supply Statement and appendix on Strategic Development Locations at 31st March 2018 published 9th October 2018<br><a href="http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/">http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/</a>   |
| Ledsham Garden Village                  | Various Housing Land Monitor Reports <a href="https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/">https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/</a>   |
| Great Kneighton (Clay Farm)             | Partly provided by Cambridgeshire County Council and included in numerous AMR's <a href="https://www.cambridge.gov.uk/annual-monitoring-reports">https://www.cambridge.gov.uk/annual-monitoring-reports</a>  |
| Trumpington Meadows                     | Included in numerous AMR's for Cambridge and South Cambridgeshire (site crosses boundaries)<br><a href="https://www.cambridge.gov.uk/annual-monitoring-reports">https://www.cambridge.gov.uk/annual-monitoring-reports</a> and <a href="https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/">https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/</a> |
| Graven Hill                             | Various Annual monitoring reports<br><a href="https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports">https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports</a>   |
| South West Bicester (Kingsmere Phase I) | Various Annual monitoring reports<br><a href="https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports">https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports</a>   |
| Great Western Park                      | Housing Land Supply Statement April 2018<br><a href="http://www.southoxon.gov.uk/sites/default/files/30.04.2018%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf">http://www.southoxon.gov.uk/sites/default/files/30.04.2018%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf</a>  |
| Ebbsfleet:                              | First phase at Springhead Park and Northfleet South from Gravesham AMR's 2009/10 to 2012/13  |
| 2009-10:                                | 127 completions<br><a href="https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69823/AMR2010.pdf">https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69823/AMR2010.pdf</a>   |
| 2010-11:                                | 79 completions<br><a href="https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69814/AMR2011.pdf">https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69814/AMR2011.pdf</a>  |
| 2011-12:                                | 55 completions<br><a href="https://www.gravesham.gov.uk/__data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-2011-12-May-2013.pdf">https://www.gravesham.gov.uk/__data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-2011-12-May-2013.pdf</a>  |
| 2012-13:                                | 50 completions<br><a href="https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/92449/Gravesham-Authority-Monitoring-Report-2012-13-interim-May-2013.pdf">https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/92449/Gravesham-Authority-Monitoring-Report-2012-13-interim-May-2013.pdf</a>  |
| 2013/14:                                | 87 dwellings, based on total completions from 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: <a href="https://ebbsfleetdc.org.uk/tracking-our-performance/">https://ebbsfleetdc.org.uk/tracking-our-performance/</a>  |

# 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 (Portland Park)                                | Northumberland           | 357  |
| Chatham Street Car Park Complex                                     | Reading                  | 307  |
| Kennet Island Phase I - H, M, T, U1, 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 A419 And A417  | Cotswold                 | 270  |
| Hortham Hospital  | South Gloucestershire    | 270  |

| Site Name  | Local Planning Authority  | Size |
|--|---------------------------|------|
| GCHQ Oakley - Phase I  | Cheltenham                | 262  |
| Hewlett Packard (Land Adjacent To Romney House)                          | Bristol, City of          | 242  |
| I28-134 Bridge Road And Nos 1 - 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 Hertfordshire        | 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 Corringham Road                                    | West Lindsey              | 141  |
| Land at Farnham Hospital   | Waverley                  | 134  |
| North of Douglas Road  | South Gloucestershire     | 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 Hertfordshire        | 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 Gloucestershire    | 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 Gloucestershire    | 52   |
| Holme Farm, Carleton Road                                    | Wakefield                | 50   |
| Land off Elizabeth Close                                     | West Lindsey             | 50   |

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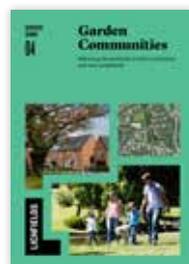
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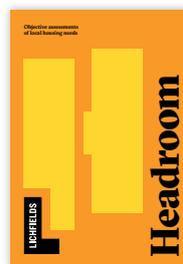
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