

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 78 APPEAL

BY

Dudsbury Homes

LAND SOUTH OF Ringwood Road

Alderholt

DORSET

PROOF OF EVIDENCE OF

Claire Lynch

BSc (Hons), M.Sc., M.Sc.,

ON BEHALF

OF

DORSET COUNCIL

Planning Inspectorate Reference: APP/D1265/W/23/3336518

Local Planning Authority Reference:

Introduction

1.1: This Proof of Evidence (PoE) relates to Housing Land Supply and should be read in conjunction with the planning PoE.

Qualifications and Experience

1.2: My name is Claire Lynch. I am a Senior Planning Officer for the Strategic Planning Policy Team for Dorset Council. My key role is to help to deliver the new Local Plan and all emerging Development Plan documents, including SPD's, Guidance and Briefing Notes. I represent the Council at Public Hearings and provide comments to Development Management colleagues on planning applications. In The Spatial Planning Team, I deal specifically with Housing Land Supply, Housing, Affordable Housing, Retail and Viability issues, and assist with other planning areas.

1.3: Prior to this, I worked as a Housing Development Officer for BCP Council for nearly 3 years. In this role, I found sites for development, assessed their feasibility and viability to deliver housing, dealt with various teams internally to deliver the housing (Procurement, Legal, Planning, Insurance and other teams), worked with the building contractors and completed housing projects (including affordable housing). Before this, I worked as a Planning Officer in both the former Borough of Poole and the London Borough of Merton working on regeneration schemes and in planning policy. Although I have experience of most planning policy topic areas, the key areas dealt with included development viability, affordable housing, retail and town centre type uses, employment, CIL and project managing CIL Neighbourhood Funds. I have worked as a Town Planner since 2007, and therefore have 17 years of experience.

1.4: I hold a Master of Science Degree in Real Estate Development (Surveying) from Westminster University, England. This degree is RICS accredited. I also hold a Master of Science Degree in Planning, Policy and Practice (Planning) from Cardiff University, Wales. This degree is RTPI accredited. In addition, I hold a Bachelor of Social Science Degree (Hons) from the University of College Cork, Ireland. This degree focused on economics, social policy, sociology, psychology, and philosophy.

1.4 The evidence which I have prepared and provide for this appeal reference APP/D1265/W/23/3336518 (in this proof of evidence) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

Relevant Experience

- 1.6: I have extensive experience of producing evidenced planning policy documents at the strategic and local levels which have been found sound at Examination.
- 1.7: I have coordinated the evidence, site monitoring and liaising with developers for the East Dorset Housing Land Supply Annual Position Statement. I have also helped to coordinate the evidence for the West Dorset and Weymouth & Portland, and Purbeck Housing Land Supply Position Statements. I have represented the Council at appeal hearings defending the Council's position on its Housing Land Supply for West Dorset and Weymouth & Portland.

2.0 Scope of Evidence

- 2.1 My role with this inquiry is to provide evidence of the councils' Housing Land Supply in relation to the refusal of outline permission for residential development of up to 1,700 dwellings, including affordable housing and care provision; 10,000 sqm of employment space in the form of a business park; village centre with associated retail, commercial, community and health facilities; open space including the provision of suitable alternative natural green space (SANG); biodiversity enhancements; solar array, new roads, access arrangements and associated infrastructure. This is an Outline Application with all matters reserved apart from access off Hillbury Road.
- 2.2 I became involved in the case in February 2024, and this PoE will respond to the critique of the Council's housing land supply evidence provided via the topic paper by the Appellant's team.
- 2.3 This proof of evidence is based on monitoring information collected by the Council through annual site visits and reported in the East Dorset Housing Land Supply Report (published January 2024 – Appendix A) [5YHLS]. The East Dorset 5YHLS sets out the Councils' position on Housing Land Supply with a base date of 1 April 2023. The information in this report is supplemented by information from on-going discussions with developers, agents and landowners.
- 2.4 The evidence seeks to present the Housing Land Supply position as at 1 April 2023 demonstrating conformity with the National Planning Policy Framework (2023) and the Planning Policy Guidance. The five-year period which the evidence relates is the period to 31st March 2028.

2.5 This PoE covers the following areas:

- A summary of the relevant national policy as contained in the National Planning Policy Framework 2023,
- A summary of the Housing Needs Requirement, Deliverable Sites and Shortfall,
- Response to the concerns raised by the Appellant through their draft Topic Paper submitted on 16 May 2024,
- Response to the Appellants submitted Infrastructure Development Statement,
- A summary of the main efforts made by the Councils to increase the supply of housing above the current rate,
- A summary of the Council intentions to update the Housing Land Supply position for the 2023/2024 year, and
- Conclusion.

3.0 National Policy Summary

3.1 National policy relevant to the calculation of the five-year supply is contained in the National Planning Policy Framework published in December 2023 (the NPPF). This is supported by additional guidance contained in the on-line National Planning Practice Guidance (PPG).

3.2 Paragraph 75 of the NPPF establishes the requirement for local authorities to monitor their deliverable land supply against their housing requirement, as set out in their adopted strategic policies. Paragraph 77 requires local planning authorities to identify and update annually their supply of deliverable sites to provide a minimum of five years' worth of housing.

Housing Needs Requirement

3.3 Paragraph 77 of the NPPF states that the identified supply of deliverable housing sites should be demonstrated against either the housing requirement set out in the adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Footnote 42 makes clear that when local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exist, it should be calculated using the standard method set out in the NPPF. The Local Plan for East Dorset is more than 5 years old,

therefore the Council have used the standard method when calculating local housing need when calculating the East Dorset Housing Land Supply Position.

3.4 The Council reserves the right to comment should the appellant submit new evidence questioning the East Dorset Housing Land Supply that has not been queried before. However, the Council would like to provide detail regarding the sensitivities included in the calculation of the housing land supply requirement in the East Dorset Housing Land Supply, to show that the Council were conservative with their approach.

3.5 The housing land supply requirement is for 2,404.9 new dwellings over the five-year period from 1 April 22 to 31 March 2028. This figure was obtained by using the standard methodology as required by the NPPF.

5-year requirement (April 2022 - March 2023).....	2,290.4
Plus 5% buffer*	2,404.9
Annual housing need.....	480.9

3.6 The earlier versions of the NPPF (prior to its update in December 2023) required a 5% buffer to be added when calculating the housing land supply when using the standard methodology. Updates to the NPPF and planning policy guidance in December 2023 deleted this requirement. Adding an additional 5% buffer increased the housing land supply requirement by 114.5 units. The position statement, as published, therefore over estimates the supply requirement by including the additional 5% buffer when it is no longer required by national policy.

3.7 The reason the Council took this approach as the report was prepared in late 2023, underwent checking and publication in late 2023 and finally published in 2024. Changes to the NPPF occurred through this final sign-off process and report was published before the changes could be made. The Council took the decision to not review the report but to highlight the change to national policy as a material consideration in planning decisions.

4.0 The Deliverable Supply

4.1 Within the plan area, a full detailed analysis of housing delivery has been undertaken. This has established the following independent sources of supply including minor sites with planning permission, major sites with extant planning permission, sites allocated within the Local Plan,

minor sites windfall allowance, specific large sites, sites allocated in neighbourhood plans and rural exception sites.

4.2 The assessment of each of these sources of supply is based on information that has been available since 1st April 2023. The deliverable supply of sites (with discounted supply) over the five-year period from 1 April 2023 to 31 March 2028 is 1,876.3 units. Full details of this supply and a list of deliverable sites is included in the East Dorset Housing Land Supply 2023.

4.3 The Deliverable Sites (with discount -see paragraph 4.6) are as follows:

Minor Sites with planning permission.....	306.7
Major sites with extant planning permission.....	1,334
Sites allocated within the local plan.....	0
Minor sites windfall allowance.....	181.6
Specific large sites	54
Sites allocated in neighbourhood plans.....	0
Rural exception sites.....	0

4.4 The total supply of deliverable sites (with discount) is 1,876.3 units. Full details of this supply and a list of deliverable sites is included in the East Dorset Housing Land Supply 2024 (5YHLS). Outside of the limited number of sites mention in the Appellant’s Topic Paper the remaining sites detailed in the 5YHLS, assumptions around obtaining full planning permission, lead-in times, build out rates and phasing of delivery, has not been contested by the appellant.

4.5 By dividing the deliverable supply (1,876.3 units) by the annualised requirement (480.9 years), the final land supply figure of 3.9 years can be calculated.

4.6 The Council discounts the supply in each category detailed in paragraph 4.3 above ranging from 5% to 10% to allow for lapses in consents and differing delivery rates. This is detailed in the East Dorset Housing Land Supply 2024. The total number of units discounted from the supply equates to 112.6 dwellings. Although applying discounts is not a requirement of the NPPF and planning policy guidance, the Council does this to account for unforeseen circumstances that cannot be predicted when calculating the supply position.

Shortfall

4.7 To have a 5-year supply of deliverable sites to meet housing needs, the total requirement of deliverable sites would be 2,404.9 units. Thus, the Council has a shortfall of sites to deliver 528.6 dwellings.

Appellants concerns with the Council's East Dorset 5YHLS

4.8 The appellants raised concerns with the Council's East Dorset Housing Land Supply Statement on the 15th May 2024 via a draft Topic Paper. Their concerns include:

- Suggesting that the local authority's calculation of the standard methodology for local housing needs should be uncapped - that the local authority should not cap local housing needs at 40%, therefore increasing the Local Housing Needs in turn increasing the shortfall in deliverable sites to meet housing needs. For the East Dorset 5YHLS, the local housing need figure was calculated using the standard methodology as the adopted Local Plan is more than 5 years old. Para 2.3.5 of the East Dorset 5YHLS report explains the purpose of this cap and the circumstances in which it should be applied, with the principle detailed in Para 005 of the planning policy guidance (ref: 2a-005-2019022). A 40% cap is permitted to be used when local authorities are calculating local housing needs figures where Local Plans are more than 5 years old. Therefore, the Council's calculations are fully in line with the NPPF and planning practice guidance. This approach used by the Council has never been raised as an issue for discussion in previous appeals where the same approach has been applied to the 5YHLS.
- Queries the inclusion of a number of sites including:
 - o 84 Gold Links Road (ref: 3/19/0460/Out): This decision was made on 19/08/19. Recent site visit in April 2024 suggest that this scheme has not yet been implemented. Therefore, we agree with the deduction of 4 units.
 - o 180 Ringwood Road (ref: 3/19/1861/Out): This decision was made on 27/12/2019. Recent site visit in April 2024 suggest that this scheme has not yet been implemented. Thus, we agree with the deduction of 15.7 units.
 - o Howe Road (ref: 3/19/0019/RM): The outline permission (ref: 3/13/0674/Out) was allowed through appeal in January 2017. Although a decision on the Reserved Matters was made in 04/07/2019, the applicant has been discharging conditions in 2024. An email from planning officer on 27/12/2023 confirms that Conditions 5, 6, 14 & 19 are the only conditions remaining which have all been partially

discharged. The planning officer confirms that the applicant cannot start on site until they have a pre-commencement meeting with the tree officers Condition 14 is required prior to occupation. These are pre-commencement conditions that one would typically see with planning applications. In accordance with the definition of deliverable sites in the NPPF, progress is being made towards the sites delivery and the applicant is still discharging conditions. If the applicant did not intend to commence delivery on-site, this activity to discharge conditions would have stopped. Therefore, this site is deliverable, and commencement on-site is expected to start soon.

- New Road Parley (various): This site was granted outline permission for 386 units (ref:3/17/3609/OUT) in February 2021. A Reserved Matters application for Phase 1 (P/RES/2022/03505) was approved for 238 units in February 2022. A site visit in 2023, confirmed that nearly all the foundation of these units were complete due to a change in Building Regulations coming forward that year. A site visit confirmed in April 2024, that 4 dwellings are now fully completed, with many other dwellings nearing completion. At the time of writing, 19 units were advertised for sale on the developer's webpage. A further Reserved Matters application (P/RES/2022/08041) was granted in May 2023 for Phase 2 of the scheme that relates to the remaining 148 units. The developer submitted an email in December 2022, confirming their building trajectory for the site with 258 units included in the 5YHLS. All of Phase 1 was included, and 20 units from Phase 2 in the last year of the 5YHLS. The developer is best placed to understand their business model, building materials, contractors and they are a national housebuilder. Most importantly this rate of delivery, and even higher rates of delivery, have been delivered on other sites in the Dorset Council area that are being built out by national housebuilders., This rate of delivery is in line with the range suggested by the Lichfield's Start to Finish Report (2024) – Appendix C. The appellant has not provided clear evidence to the contrary showing that these rates of delivery cannot be achieved, especially given that a significant number of units have had a technical start – construction of foundations.
- Specific Sites: In Appendix E of the East Dorset 5YHLS, the specific large sites are:

- Land to North of Eastworth Farm (LIS_V3) (ref: P/FUL/2022/03125) for 38 units. Even though a planning application was approved 28/06/2023, the applicant is continuing to discharge planning conditions with the most recent in 08/04/2024. This planning application relates to land allocated for development in the Local Plan. Policy VTSW4 of the Christchurch and East Dorset Local Plan – Part 1 (2014) identifies land to the north west of Verwood for the creation of a New Neighbourhood comprising around 230 homes. The site forms part of the identified area of land and the proposal is therefore considered acceptable in principle. In accordance with the NPPF and planning policy guidance, if a site is allocated, there is only a need to show clear evidence of progress with a site’s delivery. A submitted planning application, and engagement from the applicant at the time the East Dorset 5YHLS was written justifies this sites inclusion.
 - Land at Back Lane (site 1) P/FUL/2021/05768 for 22 units. This application is still under consideration, and it is likely to be approved in the next few weeks. Again, this site is allocated for development, CHASE6 in the East Dorset District Local Plan (2002) – and is a saved policy. In accordance with the NPPF and planning practice guidance, if a site is allocated, there is only need to show clear evidence of progress with this sites delivery. A submitted planning application, and engagement from the applicant at the time the East Dorset 5YHLS was written justifies this sites inclusion. The scheme now proposes 20 units rather than the 22 units initially proposed and therefore the deliverable supply is reduced by 2 units.
- Windfalls: The windfall sites are separate to those 5YHLS sites that are identified as minor sites with planning permission. To ensure that there is no double counting, windfall sites are only included in the last 3 years of the 5YHLS period. Para 72 of the NPPF: “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regards to the SHLAA, historic windfall delivery rates and expected future trends. The evidence for the windfall allowance is set out in Appendix D of the East

Dorset 5YHLS. Again, this approach is used across the Dorset Council area when calculating 5YHLS and it has not been raised as an issue for appeals.

- Therefore, the Council agrees to the reduction in its over 5YHLS by 21.7 units. This reduces the total requirement of deliverable sites to be 2,383.2 units. Thus, the Council has a shortfall of sites to deliver 550.3 dwellings.

5.0 The Appellants Infrastructure Statement

5.1 The appellants submitted P-OUT-2023-01166: Infrastructure Delivery Plan with Housing Trajectory (herein referred to as the IDP) during the appeal process. The IDP includes a Gantt chart showing the proposed delivery for the Alderholt scheme in the event that it receives planning permission.

5.2 Bearing in mind it is a significant major scheme comprising of circa 1,700 dwellings and the application is currently outline in nature, the appellants propose first delivery of homes on site in 2026, with development forecasted to continue up until 2038. The IDP anticipates that this scheme will be delivered in 13 phases. Again, this proposal includes the delivery of circa 1,700 dwellings, a local centre (including retail and a health centre), an 80 extra care bed facility and employment uses (circa 10,000 sqm). The proposal also includes the development of 28 units by an SME. This Gantt chart provides further detail about the delivery of each of those 13 phases, including infrastructure to support the scheme. This is evidence of the complexity of the scheme.

5.3 The appellants have submitted an outline planning application, leaving the majority of matters dealt with through reserved matters. Litchfield's recently published Start to Finish Report that was published in March 2014 (herein referred to as the Lichfield's Report). The Lichfield's Report estimates the time it takes for large housing developments to reach the delivery phase. Although the report has its limitations, the Council acknowledges that the Lichfield's report can be a useful tool in generally understanding housing delivery estimates at a higher level, when more specific evidence (as required by the NPPF and planning policy guidance) is not available or clear. In the absence of clear evidence to support the IDP from the appellant, the Lichfield's Report will be used as a helpful benchmark to highlight our concerns with the appellant's evidence.

5.4 Firstly, the East Dorset Housing Land Supply Report for the monitoring year 1st of April 2022 until 31st March 2023 was published in January 2024. It calculates the housing land supply

period from 2022/2023 until 2028. The appellants IDP shows that it anticipates delivering 264 dwellings from 2026 to 2028 should it receive planning permission. Bearing in mind the complexity of the scheme, the proposed delivery appears overly optimistic. Assuming the appellants are right and that 264 dwellings will be delivered between 2026 and 2028, it still does not result in a 5-year housing land supply sufficiency.

5.5 Secondly, using the evidence gathered in the Lichfield's Report, the appellant suggests that they can commence development on site in 2026, which is circa 2 years from now. The Lichfield report suggests that for a significant major site to achieve detailed planning permission is circa 5 years which is significantly beyond the 2 years suggested by the appellant. The lowest numbers of years the Lichfield Report suggests for obtaining detailed planning consent for a site between 1,499 and 1,900 units is 3.7 years. So, without clear evidence before us to the contrary, the Council would question if commencement within the next 2 years is realistic given the need for the applicant to submit Reserve Matters applications, for this to be approved, and to discharge all pre-commencement conditions in addition to other commitments before commencement on-site. All of this would need to happen before the delivery of units can begin.

5.6 Thirdly, the Council would also question the delivery rates suggested by the appellant. The Lichfield Report provides a range of delivery rates for the larger development sites, and timescales for delivery. The average build out rates for larger schemes between 1,500 dwellings and 1,900 dwellings, is between 74 to 130 dwellings depending on the developer, site specific circumstances, availability of finance, materials, contractors and construction workers. From 2028 to 2038, the suggested delivery rates in most years are beyond this range. Again, without clear evidence before us, the Council questions whether this delivery rate suggested by the appellant is realistic.

5.7 Finally, it is worth mentioning, only schemes considered 'deliverable' by the local authority and with evidence to support their delivery, can be included in the Council's Housing Land Supply Position Statement. A deliverable site in the NPPF is described in the second part of the definition of deliverable as a site that "has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years".

Increase Housing Delivery across the East Dorset Area

5.8 The Council published the Housing Delivery Action Plan in March 2024, showing how the Council intends to maximise potential to delivery housing across the Dorset Council area. It explains how the Council's Planning Team (including the Strategic Planning team, Community Planning team, Implementation Team, Development Management team and Housing Enabling team) intend to work together to maximise the delivery of housing.

5.9 One of the tools that the Council will be the emerging Dorset Council Local Plan which will allocate sites for housing. The Council will work with developers to address barriers to housing delivery, continuing the effective dialogue with all key stakeholders to ensuring that planning decisions are reached in a timely manner. The Council will work with key stakeholders such as register providers and the community to deliver housing and to submit bids for external funding (such as Homes England funding) to deliver housing where there are challenges to development financing. The Housing Delivery Action Plan 2024 for Dorset is included in Appendix B.

Working towards finalising an Annual Position Statement

5.10 Dorset Council has notified PINS of its intention to 'confirm' its Housing Land Supply for the 2024/25 year through the production of an Annual Position Statement. The Council intends to produce a single Housing Land Supply Position Statement for the whole Dorset Council area, which includes the former East Dorset District Council area. The Council is currently monitoring sites and liaising with developers to form an opinion on its housing land supply for the 2024/25 year. Once this is completed, it will be published for comment with the intent to submit it to PINS in at the end of July 2024. PINS will then confirm the Council's Housing Land Supply in October 2024, for it to be fixed for the following year. This may have implications for this appeal.

5.11 Previously the approach reflected the legacy authorities' areas as the adopted Local Plan housing targets were less than five years old when Dorset Council was formed. There are provisions within the NPPG for legacy authority areas to continue to be used until the policies in plans are superseded or where the reorganised planning authority is less than five years old. The legacy local authorities Local Plans' are now more than five years old and Dorset Council has been in existence for more than five years.

5.12 Dorset Council has taken the decision to move to a single Housing Land Supply Statement to give a consistent approach across Dorset and to give the Council the ability to confirm its supply through one single Annual Position Statement.

Conclusions

5.13 The Council has responded to the appellants concerns raised through this appeal regarding some aspects of its Housing Land Supply Position. It has also been suggested by the appellant that the proposed scheme would add significantly to the 5 Year Housing Land Supply for the East Dorset area, and this PoE has critique this. Outside of the topics covered, the appellant has not raised concerns with other aspects of the East Dorset Housing Land Supply. Should the appellant raise concerns regarding other aspects of the Housing Land Supply Position Statement not detailed in this response, the Council reserves the right to respond.

Appendix A.

East Dorset Housing land supply report April 2023

PUBLISHED JANUARY 2024

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NOTE: Due to rounding, the calculations throughout this document may not calculate precisely.

1.0 Executive Summary

1.1 SUMMARY

- 1.1.1 This report covers the monitoring period from 1st April 2022 to 31st March 2023. It covers the former local authority area of East Dorset District Council (EDDC). The adopted Local Plan for EDDC is a joint plan with Christchurch Borough Council (CBC) and was adopted by both authorities in April 2014. The Local Plan is therefore now more than 5 years old. The former councils of East Dorset District and Christchurch Borough now form part of Dorset Council and BCP Council respectively and in 2019, the councils jointly made the decision to produce separate 5-year Housing Land Supply reports for each former council area, with this report being completed by Dorset Council and covering the area covered by EDDC.
- 1.1.2 As set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) when an adopted local plan is more than 5 years old, the housing requirement is calculated using the standard methodology established in NPPG. The housing requirement calculated using this methodology for the 2023-2028 five-year period is 481 dwellings per annum. EDDC can demonstrate a housing supply of 1,876.3 dwellings between 2023-2028 therefore East Dorset is able to demonstrate a housing land supply of 3.9 years. It is important to note, that this result is based on using the Government’s recently Housing Delivery Test Results dated 2022.
- 1.1.3 This figure takes into account the updated advice from Natural England issued in March 2022 highlighting the need for all new developments within the River Avon Catchment and the Poole Harbour catchment, to demonstrate nutrient neutrality.

2.0 Introduction

2.1 CONTEXT

- 2.1.1 In December 2023, the Government issued an updated NPPF. The revised national policy maintains the requirement for Local Planning authorities to demonstrate a supply of specific deliverable sites on an annual basis. The updated NPPF continues with the requirement for Local Authorities to publish an Annual Position Statement, which sets out the 5-year housing land supply position each year or 4-year housing land supply subject to certain criteria including the local authority having consulted on a new Reg 18/19 Local Plan with allocations, policies map and other criteria. This report sets the current position for the former local authority areas of East Dorset District Council (EDDC).
- 2.1.2 It is Dorset Council's opinion that the criteria for reducing the 5-year housing land supply position down to 4-years are met. The Council consulted on its Reg 18 Local Plan consultation held from January to March 2021. The Council's consultation statement for the Dorset Council Local Plan consultation and summaries of responses were published in January 2023. Also, the Council has undertaken key consultation since the Local Plan consultation in 2021, including consultations on the Council's Interim Position Statement on Climate Change (April to June 2023), and consultations in relation to the examination of the Purbeck Local Plan. Furthermore, significant Local Plan evidence gathering has been undertaken and published during this period, including key evidence relating to viability, housing needs, the accommodation needs of Gypsies and Travellers, habitats regulations, ecology, and town centres and retail development. Further evidence work is currently being undertaken, as well as work to resolve significant issues with nutrient neutrality, and work towards implementing Biodiversity Net Gain. Therefore, progress is being made with the emerging Dorset Council Local Plan in accordance with the Council's adopted Local Development Scheme.
- 2.1.3 NPPG details measures aimed at increasing the supply of new homes nationally. These include a standard method for calculating the Local Housing Need requirement for each Local Planning authority area and the approach to the Housing Delivery Test which is updated annually. The revised NPPF also continues with the requirement for Local Planning authorities to produce an action plan if they show consistent patterns of under delivery¹.

¹ National Planning Policy Framework 2023, paragraph 79, page 21

2.2 NUTRIENT NEUTRALITY

- 2.2.1 A significant constraint affecting the deliverability of sites within the Dorset Council area is nutrient neutrality following the advice issued by Natural England on 16 March 2022.
- 2.2.2 The approach advocated by Natural England is that any development that leads to an increase in nutrient loading within the catchment of one of the freshwater or estuarine habitats that are in unfavourable condition, should be nutrient neutral. This would result in no net increase in nutrients entering the protected habitat sites arising from development via both wastewater and surface water flows.
- 2.2.3 Since this advice was issued, the Government have put in measures to help to unblock housing sites. These measures include:
- A legal requirement introduced through the Levelling Up and Regeneration Act 2023 (LURA) for wastewater treatment works serving 2,000 population equivalents or more to be upgraded to reduce the nutrient flow from wastewater. This significantly reduces the burden for nutrient neutrality for development that connects to an upgraded wastewater treatment works. There is also provision for the Secretary of State to nominate additional wastewater treatment works below the 2000+ population equivalents threshold for upgrade.
 - A nutrient mitigation scheme to be managed by Natural England aimed at delivering nutrient mitigation within the affected catchments.
 - A Local Nutrient Mitigation Fund to enable Local Planning Authorities to develop local mitigation strategies to deliver mitigation for development. Both Dorset Council (for the Poole Harbour catchment) and Wiltshire Council (for the River Avon catchment) have been awarded funds to deliver mitigation within the catchments that affect the East Dorset area.
- 2.2.4 The approach Dorset Council is taking in each of the 5 catchments that affect Dorset (River Axe, River Avon, Chesil & The Fleet, Somerset Levels and Moors and Poole Harbour Catchment) is different due to the nature of the catchments and the different working arrangements with neighbouring Local Authorities that share the catchment area.
- 2.2.5 For the Poole Harbour catchment, Dorset Council and Natural England's position is that if sufficient wastewater treatment works are required to be upgraded within the catchment through the LURA, the need for development to demonstrate phosphorus neutrality will be removed. At the time of writing this report, the LURA received Royal

Assent on 26 October 2023 with the majority of provisions within the Act coming into force on 26 December 2023. Dorset Council and Natural England are in conversation with DLUHC about the Secretary of State nominating the additional wastewater treatment works within the Poole Harbour catchment for upgrade in order to remove the need for phosphorus neutrality.

- 2.2.6 At the present time, and before the nomination of additional wastewater treatment works for upgrade, there is some uncertainty within the Poole Harbour catchment about the need for phosphorus neutrality. There are currently no strategic mechanisms in place to deliver phosphorus mitigation in the short term however some mitigation proposals that are in the pipeline will enable phosphorus mitigation to be achieved. Dorset Council have an existing mechanism in place for delivering nitrogen neutrality within the Poole Harbour catchment and this approach will deliver significant nitrogen mitigation through the funds awarded through the Local Nutrient Mitigation Fund.
- 2.2.7 In the River Avon catchment, there are some mitigation projects being delivered that are providing phosphorus mitigation. With the award to Wiltshire Council through the Local Nutrient Mitigation Fund, mitigation projects will be identified and implemented to provide sufficient mitigation for future development.
- 2.2.8 Within the remaining catchments that affect the Plan area, there remains a need to demonstrate phosphorus (and for Chesil & The Fleet, nitrogen) neutrality and Dorset Council is working with partners to identify and deliver opportunities for delivering this mitigation.

2.3 THE HOUSING TARGET

- 2.3.1 National policy requires Local Planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing against their housing requirement set out in adopted strategic policies, or against their Local Housing Need where the strategic policies are more than five years old².
- 2.3.2 Where a Local Plan containing strategic policies for the delivery of housing has been adopted within the past five years, the housing requirement within the plan can be used for the purpose of the four-year supply. Where the plan is more than five years old, the Local Housing Need figure should be used. This Local Housing Need figure is

² National Planning Policy Framework 2023, paragraph 77

calculated using the standard methodology contained in the NPPG³ and is based on household projections and the local affordability ratio.

- 2.3.3 The Local Affordability Ratio is a measure of the affordability of homes in an area and is based on median house prices and median earnings. The affordability of homes is linked to the supply of homes in an area and therefore reflects past rates of delivery. If delivery has been below demand, the affordability ratio will be higher resulting in a higher Local Housing Need target. For this reason, national guidance indicates that past under-delivery in an area does not need to be considered separately to the affordability of homes⁴.
- 2.3.4 However, if an adopted Local Plan is less than five years old and the delivery of homes has been below the strategic housing target since the base date of the adopted Local Plan, any shortfall will need to be made up within the five-year supply period.
- 2.3.5 Where strategic policies for the delivery of housing in a Local Plan were adopted within the last five years, the Local Housing Need figure is capped at 40% above the adopted annual average housing requirement figure. Where the policies were adopted more than five years ago (at the point of making the calculation), the housing figure is capped at 40% above the lowest of either the average projected household growth over a 10-year period or the most recently adopted housing target in a Local Plan. The reason for the cap is to ensure that the Local Housing Need figure is as deliverable as possible and not significantly above the housing target currently being planned for⁵.

2.4 THE HOUSING DELIVERY TEST

- 2.4.1 In addition to the requirement to identify deliverable sites against the housing target, national policy requires a buffer to be applied to the target. The buffer should be:
 - a) 5% to ensure choice and competition in the market for land; or
 - b) 10% where the Local Planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or

³ National Planning Practice Guidance Paragraph: 004 Reference ID: 2a-004-20201216

⁴ National Planning Practice Guidance Paragraph: 011 Reference ID: 2a-011-20190220

⁵ National Planning Practice Guidance Paragraph: 007 Reference ID: 2a-007-20190220

- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply⁶.

2.4.2 The delivery of housing within an area is measured through the annual application of the Housing Delivery Test. The result of the Housing Delivery Test is a percentage measurement of the net number of new homes delivered against the housing requirement over a rolling three-year period⁷.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net new homes delivered over a 3 year period}}{\text{Total number of homes required over 3 year period}}$$

2.4.3 For the purposes of the Housing Delivery Test, the target for measuring the delivery of homes should be the Local Housing Need figure calculated using the standard methodology unless a plan target has been adopted within the previous five years. If a requirement has been adopted within the previous five years, the Housing Delivery Test should be measured against the lower of either the plan target or the Local Housing Need figure.

2.4.4 Where delivery as measured by the Housing Delivery Test falls below the planned rate, the following penalties apply:

- Where delivery is below 95% of the planned rate, an action plan should be published setting out the actions being taken to increase delivery.
- Where delivery falls below 85% of the planned rate, a 20% buffer should be added to the housing land supply to ensure a realistic prospect of delivery against the housing requirement and an action plan should be published.
- Where delivery falls below 75% of the planned rate, the presumption in favour of sustainable development will apply, a 20% buffer should be applied, and an action plan should be published.

2.5 DELIVERABLE SITES

2.5.1 The 2023 version of the NPPF includes a definition of a 'deliverable' site for the purpose of demonstrating a four-year supply.

⁶ National Planning Policy Framework 2023, paragraph 79, page 22

⁷ Housing Delivery Test Measurement Rule Book, MHCLG, July 2018

- 2.5.2 The definition of a deliverable site essentially divides housing sites into two groups, those that are presumed deliverable unless clear evidence suggests otherwise, and those which should only be presumed deliverable where there is clear evidence that homes will be delivered within five years.

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.⁸

2.6 IMPLICATIONS

- 2.6.1 If a Local Planning authority is unable to demonstrate a five-year supply (or four-year supply where paragraph 266 of the NPPF applies) of deliverable sites, relevant policies for the supply of housing are considered 'out of date' and the tests in paragraph 11 of the NPPF need to be applied, alongside relevant policies in the development plan when making planning decisions. In the case of the supply calculations for Dorset, there is only a need to demonstrate a four-year supply of deliverable sites in accordance with paragraph 266 of the NPPF.
- 2.6.2 This document establishes the four-year supply requirement for the former East Dorset District Council area having regard to rates of delivery since the start of the Local Plan period (i.e. since 2013), the Local Housing Need target and Housing Delivery Test results. It then looks at the supply of housing against this requirement on the basis of the most up-to-date information on the completions and commitments as at April 2023 and having regard to recent amendments to national planning policy.

⁸ National Planning Policy Framework Glossary 2023, page 69

3.0 Housing Supply Requirement

3.1 HOUSING TARGET

- 3.1.1 The Joint Christchurch and East Dorset Local Plan Part 1 – Core Strategy was adopted following the recommendation of the Inspector in her report on the examination of the plan. It was adopted by Christchurch Borough Council on 22nd April 2014 and by East Dorset District Council on 28th April 2014. The Core Strategy covers the 15-year period from 2013 to 2028 and was adopted more than five years ago.
- 3.1.2 Given that the joint East Dorset and Christchurch Local Plan was adopted in April 2014, and it is therefore more than five years old, the Local Housing Need, calculated using the Standard Methodology has been used as the basis for establishing the housing target in this report.
- 3.1.3 As a result of using the Local Housing Need figures and the Housing Delivery Test, BCP Council and Dorset Council took the decision in 2019 to produce separate five-year housing land supply reports for the former Local Planning authority areas of East Dorset and Christchurch.

LOCAL HOUSING NEED

- 3.1.4 The standard methodology for calculating the Local Housing Need for an area utilises the projected growth in households within that area⁹ adjusted to take into account local housing affordability through a three-step process. Step 1 sets the baseline using the 2014-based household projections, Step 2 adjusts this baseline through the application of affordability ratio and Step 3 allows for the resultant housing target to be capped. An additional Step 4 applies an uplift to the top 20 cities and urban areas across the country. The data used to calculate the Local Housing Need has a base date of 2023 and therefore the household projections and the affordability ratios are those available at this base date.

Step 1 – Setting the baseline

- 3.1.5 The 2014-based household projections are used to calculate the average household growth over the 10-year period from the base date for when the calculation is being undertaken. The base date for this report is 1 April 2023 and therefore the calculation of local housing need uses the 10-year period from 2023 to 2033. Over this period, the projected growth in households for the former EDDC area is as shown in Figure 3.1

⁹National Planning Practice Guidance Paragraph: 005 Reference ID: 2a-005-20190220

with the average annual change in households projected to be 327 additional households per annum.

Figure 3.1: 2014-based household projections for East Dorset 2023 to 2033

YEAR	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Number of households	40,609	40,928	41,247	41,580	41,917	42,254	42,589	42,922	43,254	43,573	43,881

Source: ONS Live table 406

Step 2 – Applying the affordability adjustment

3.1.6 The baseline annual projected household growth figure is adjusted to reflect the affordability of housing in the area. This adjustment is based on the median workplace-based local affordability ratios published in March 2023. For EDDC, the affordability ratio released in 2023 is 14.51 and this figure has been used to calculate the affordability adjustment factor.

3.1.7 The adjustment factor is calculated on the following basis:

$$\text{Adjustment factor} = \left(\frac{\text{local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

3.1.8 For the East Dorset area, the median workplace-based local affordability ratio gives an adjustment factor of 1.66.

Step 3 – Capping the increase

3.1.9 The level of increase in the calculated housing requirement is capped to limit the increase to reasonable levels allowing the local authority and housing market to adjust. The cap depends upon the status of the adopted housing target as set out in national guidance¹⁰:

“Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10-year period identified in step 1; or
- b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).”

¹⁰ National Planning Practice Guidance Paragraph: 004 Reference ID: 2a-004-20190220

3.1.10 For East Dorset, the adopted strategic housing requirement is now more than five years old and therefore the cap would be applied to higher of either the Local Plan’s average annual housing target or the projected household growth figure established through Step 1. The adopted Local Plan target was a joint target shared with the former CBC so it is not possible to establish which would be the higher of the Local Plan target or the household projections. It is therefore considered that the cap should be applied to the annual average household growth figure established through Step 1 of the Standard Methodology.

Step 4 – Cities and urban Centres Uplift

3.1.11 The final adjustment made as part of the standard methodology is to apply an uplift of 35% to those local authority areas that fall within the top 20 cities and urban areas list published by the Office for National Statistics. EDDC does not however fall within this list and therefore the uplift is not applied.

Calculating Local Housing Need

3.1.12 The four steps used in the calculation of the Local Housing Need figure for the East Dorset and Christchurch area is outlined in Figure 2.2. These calculations indicate that the Local Housing Need requirement for the purpose of this report is 458.08 dwellings per annum.

Figure 3.2: Calculation Local Housing Need

COMPONENT	CALCULATION	RESULT
Step 1: Setting the baseline	Annual average household growth 2023 to 2033	327.2
Step 2: Adjustment to take account of affordability	Applying the adjustment factor of 1.66	543.15
Step 3: Capping the level of any increase	Applying the cap at 40% above the annual average household growth figure	458.08
Step 4: Cities and urban centres uplift	No uplift to be applied	458.08
Local Housing Need		458.08 dwellings per annum

3.2 SUPPLY BUFFER

- 3.2.1 In addition to the requirement to provide for four years' worth of housing land and to make up for the relevant shortfall within the four-year period, there is a need to apply a buffer to this supply. The rules set out for the Housing Delivery Test in the National Planning Practice Guidance are as follows:
- 5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5-year housing land supply;
 - 10% - the buffer for authorities seeking to confirm' 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in [paragraph 79 of the National Planning Policy Framework](#)), unless they have to apply a 20% buffer (as below); and
 - 20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.
- 3.2.2 The buffer is derived through the application of the Housing Delivery Test which assesses the delivery of homes against the housing requirement for the area. This test is backward looking and assesses the past three-year work of delivery against the previous 3 years target.
- 3.2.3 In December 2023 the Government published official Housing Delivery Test results for 2022, which are measured over the years 2019/20, 2020/21, and 2021/22.

NEW HOMES DELIVERED

- 3.2.4 This net number of new homes delivered over the past three years within East Dorset has been gathered through annual site visits where the number of newly built homes is counted. This information will be submitted to Department for Levelling Up, Housing and Communities (DLUHC) who publish the data as live tables on Housing Supply¹¹.
- 3.2.5 In addition to the delivery of new homes, an allowance is made within the Housing Delivery Test for increases in communal accommodation based on the number of bed spaces delivered. In line with the Housing Delivery Test Measurement Rule Book 'student only accommodation' is counted at 2.5 persons per household whilst a ratio of

¹¹ Live tables on housing supply: net additional dwellings, DLUHC

1.8¹² is applied to 'other communal accommodation'. This is based on the national average datasets for these types of communal accommodation.

NEW HOMES REQUIRED

- 3.2.6 To calculate the number of new homes required, the housing target for the preceding three-year period is used. If a Local Plan is less than five-years old, the adopted Local Plan target is used to establish the housing target. For the year within which the Local Plan becomes more than five-years old, the minimum Local Housing Need figure should be used calculated with a base date of 1 April of that year by applying the Standard Method set out in national guidance.
- 3.2.7 The joint Christchurch and East Dorset Local Plan was adopted in April 2014 the plan therefore became more than five years old in April 2019. For the current year, the measurement of the Housing Delivery Test isn't required to use any of the adopted Local Plan housing target and only the Local Housing Need target. However, for the purposes of the Housing Delivery Test, it has been agreed with DLUHC that the results will be published on the basis of the combined Christchurch and East Dorset areas.
- The Covid-19 Pandemic resulted in a national lockdown in 2020 which disrupted the Planning Service and caused a suspension of development on construction sites. This impact on delivery of housing against targets have been recognised by government for the 2019-20 and 2020-21 years. The result has been to reduce the number of homes required within the 2019-20 year by one twelfth of the annual target (31 days). For the 2020-21 year, the target was reduced by 122 days. The net result is that the overall target for the combined Christchurch and East Dorset area being reduced to 712 dwellings for the 2019-20 Year and to 537 dwellings for the 2020-2021 Year¹³.
- 3.2.8 To calculate the provisional results of the Housing Delivery Test, the number of new homes delivered is divided by the number of new homes required. As the Housing Delivery Test is backwards looking it is calculated based on delivery against the joint Christchurch and East Dorset housing requirement. **The Housing Delivery Test result issued by Government for the year 2022 is 90%.** As this is this is the official test result, and given recent legal advice, this Housing Delivery Test must be used. This means that a 5% buffer needs to be applied to the housing target and an Action Plan needs to be produced to set out measures to address the delivery of new homes.

¹² Housing Delivery Test Measurement Rule Book, MHCLG, July 2018

¹³ Housing Delivery Test measurement technical note 2021 – January 2022

3.3 FACTORING IN ANY SHORTFALL AND THE BUFFER

3.3.1 As the adopted Local Plan East Dorset is more than 5 years old and the housing requirement is derived from the calculated Local Housing Need, there is no requirement to factor in any shortfall in provision from the beginning of the Local Plan period¹⁴. The buffer identified through the application of the Housing Delivery Test therefore only applies to the calculated Local Housing Need requirement.

3.4 THE FIVE-YEAR REQUIREMENT – APRIL 2023

3.4.1 Applying the above assumptions and using the completions data to 1st April 2023, enables the calculation of the five-year requirement for the period 2023 to 2028 as shown in Figure 3.3.

Figure 3.3: Five Year Housing Requirement 2023-2028

COMPONENT	CALCULATION	RESULT
EDDC		
Step 1: Setting the baseline	Annual average household growth 2023 to 2033	327.2
Step 2: Adjustment to take account of affordability	Applying the adjustment factor of 1.66	543.15
Step 3: Capping the level of any increase	Applying the cap at 40% above the annual average household growth figure	458.08
Step 4: Cities and urban centres uplift	No uplift to be applied	458.08
Local Housing Need EDDC		458.08 dwellings per annum
EDDC HOUSING REQUIREMENT		
Local Housing Need for EDDC		458.08 dwellings per annum
Multiplied by the 5 year period (2023-2028)	458.08 x 5	2,290.4

¹⁴ National Planning Practice Guidance Paragraph: 031 Reference ID: 68-031-20190722

Plus, the 5% buffer (derived from the Housing Delivery Test)	$2,290.4 \times 1.05$	2,404.9
Total 5-year requirement		2,405

4.0 Supply Calculations

4.1 INTRODUCTION

- 4.1.1 In order to understand the supply of land available for residential development, it is necessary to look at a number of different categories. Potential sources of housing supply include extant planning permissions and allocations in the Local Plan. There are also sites identified as having development potential through the Strategic Housing Land Availability Assessment (SHLAA), sites on the brownfield register, sites with permission in principle and windfall sites that cannot specifically be identified but contribute significantly to the supply of housing.
- 4.1.2 Since the examination of the Christchurch and East Dorset joint Local Plan, the revised NPPF has changed the definition of a deliverable site which has altered the way different types of sites are considered. For this reason, the supply of sites considered to be deliverable for the purposes of the five-year housing land supply, have been subject to a review with the supply in this report shown for the East Dorset area only. The different sources of supply considered to be deliverable within five years include:
- minor sites (1 to 9 dwellings) that benefit from planning permission;
 - major sites (10 + dwellings) that benefit from planning permission;
 - sites allocated within the Local Plan;
 - a minor sites windfall allowance (1 to 9 dwellings)
 - specific large sites (10 + dwellings) identified as having development potential (e.g. through the SHLAA or the brownfield register);
 - sites allocated in Neighbourhood Plans; and
 - rural exception sites.
- 4.1.3 For each of these site categories, different criteria have been used to estimate delivery within five years and therefore the contribution towards the five-year supply. To these estimates, discounts have been applied to allow for the inevitable uncertainties that exist in any estimate.
- 4.1.4 Several appeals have examined the evidence needed to support the deliverability of a site. The appeal decision for Land South of Westleaze, Charminster (Appeal Reference: APP/D1265/W/18/3206269) clarified the evidence needed to demonstrate deliverability of a site and the messages in this decision have been incorporated into the evaluation of the supply. In addition, the called in appeal at Land to the East of Newport Road and to the East and West of Cranfield Road (Appeal Reference:

APP/Y0435/W/17/3169314) has supported the view that evidence obtained after the 5YHLS base date (1 April each year) can be considered when demonstrating site deliverability if the site was considered deliverable at the base date.

4.2 MINOR SITES WITH EXTANT PLANNING PERMISSION

- 4.2.1 The definition of deliverable in the 2023 version of the NPPF states that “sites which do not involve major development ... should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years”.
- 4.2.2 Within East Dorset a large proportion (21%) of the housing completions over the past 5 years have been made up of small sites of less than 10 dwellings¹⁵. Historically, from the point of the grant of planning permission, just under 96% of these minor sites have been built within five years. It is of course impossible to identify which sites will not deliver within five years so to allow for this, the total stock of minor sites with extant consent are discounted by 5%.
- 4.2.3 The approach adopted for minor sites with planning permission is considered robust and in accordance with the relevant parts of the definition of deliverable.

Figure 4.1: Five-year supply from minor sites with extant planning permission

SOURCE	SOURCE TOTAL	FIVE-YEAR SUPPLY ESTIMATE	DISCOUNTED FIVE-YEAR SUPPLY
Minor sites with extant planning permission	326.9	322.9	306.7

4.3 MAJOR SITES WITH EXTANT PLANNING PERMISSION

- 4.3.1 For major sites with extant planning permission, the relevant parts of the NPPF definition of deliverable states that “sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)”.

¹⁵ Based on available records of completed residential development sites since 2015/16

- 4.3.2 For sites of 10 dwellings or more that benefit from an extant detailed planning permission (either full or reserved matters) a case by case assessment has been made to assess how many new homes will be delivered within five years. This case by case analysis has included consideration of the number and type of units being delivered on a site, the details of any infrastructure requirements, the discharge of conditions associated with the planning permission, whether a CIL commencement notice had been received, feedback from the developer as to their programme for developing the site and information from case officers working on specific applications.
- 4.3.3 Major sites which benefit from outline permission were considered in a similar way to detailed consents having regard to recent appeal decisions. Progress towards gaining full consent, along with information from the developer about their programme for delivering the site including their anticipated housing trajectory. Information from the case officer working on the application along with the current planning status of the site was also considered including the discharge of any planning conditions.
- 4.3.4 For major sites with detailed planning permission and sites with outline permission the consideration of this information gave rise to an informed assessment of the proportion of units that are deliverable within five years. The resultant estimate of delivery was then discounted by 5% to allow for any uncertainty.
- 4.3.5 The approach to major sites that have either detailed or outline planning permission is considered to accord with the relevant parts of the definition of deliverable in the NPPF.

Figure 4.2: Five-year supply from major sites with extant planning permission

SOURCE	SOURCE TOTAL	FIVE-YEAR SUPPLY ESTIMATE	DISCOUNTED FIVE-YEAR SUPPLY
Major sites with extant planning permission	1,525.2	1,404.2	1,334

4.4 SITES ALLOCATED WITHIN THE LOCAL PLAN

- 4.4.1 The definition of deliverable in the NPPF states that sites allocated in the development plan “should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.” For the sites allocated in the adopted Local Plan a similar set of evidence was considered to that for major sites with

planning permission including information from the site developers and progress being made towards delivery. These considerations again gave rise to an assessed level of delivery for inclusion within the five-year supply. This estimate was then discounted by 10% to allow for all uncertainties. No allowance has been made for new allocations being considered through the emerging Dorset Council Local Plan.

- 4.4.2 The approach for sites allocated in the adopted development plan is considered to accord with the definition of deliverable in the NPPF.

Figure 4.3: Five-year supply from sites allocated in the Local Plan

SOURCE	SOURCE TOTAL	FIVE-YEAR SUPPLY ESTIMATE	DISCOUNTED FIVE-YEAR SUPPLY
Sites allocated within the Local Plan within the East Dorset area	369.0	0.0	0.0

4.5 MINOR SITES WINDFALL ALLOWANCE

- 4.5.1 A windfall site is a site not specifically identified in the development plan. National policy makes provision for such sites to be included in the supply of homes specifically noting that "small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly"¹⁶.
- 4.5.2 When including an allowance for windfall sites within the housing supply, national policy indicates that there needs to be "compelling evidence that they will provide a reliable source of supply..." and that the allowance "...should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends"¹⁷.
- 4.5.3 A detailed analysis of windfall rates has been undertaken for the East Dorset area (as summarised in Appendix D). This analysis has been focused on those sites that fall within the minor category (i.e. sites of between 1 and 9 dwellings) with major (i.e. sites of 10 or more dwellings) being considered as a separate supply category.

¹⁶ National Planning Policy Framework paragraph 70, 2023

¹⁷ National Planning Policy Framework paragraph 72, 2023

- 4.5.4 The Council has been conservative in removing the windfall allowance for the first two years in all areas, to avoid any potential double counting for sites that may have permission. Although the windfall rate and build-out rate are based on detailed assessment of past delivery, the numbers of windfall sites each year will most likely change. For this reason, a further 10% discount has been applied to the estimates of windfall delivery within the remaining three-year period. The final windfall allowance for each settlement is shown in Figure 4.4.
- 4.5.5 The approach to minor windfall sites is considered to be in accordance with national policy¹⁸.

Figure 4.4: Five-year windfall allowance for each settlement

SETTLEMENT	ANNUALISED WINDFALL RATE	WINDFALL OVER 5 YEARS: PROFILE OF DELIVERY	DISCOUNTED WINDFALL ALLOWANCE
Alderholt*	3	7.4	0
Corfe Mullen	3.6	8.7	7.8
Colehill/Wimborne	22.0	58.2	52.3
Ferndown/West Parley	19.3	51.4	46.2
Holt, Knowlton & Sixpenny	6	15.8	14.2
St Leonards & St Ives	8.2	22.5	20.3
Sturminster Marshall	3.2	8.4	7.5
Verwood	5.9	16.3	14.7
West Moors	4.6	13.1	11.8
Rural (inc Vale of Allen, Pampill and Cranborne)	2.8	7.4	6.7
East Dorset	78.6	201.8	181.6

*Alderholt windfall has been removed from the 5YHLS calculation as a result of nutrient neutrality constraints.

¹⁸ National Planning Policy Framework paragraph 72, 2023

4.6 SPECIFIC LARGE SITES

- 4.6.1 The minor sites windfall allowance does not make any allowance for sites not identified in the development plan that fall within the definition of major development (i.e. sites of 10 or more dwellings).
- 4.6.2 As set out under minor sites windfall, when including an allowance for windfall sites within the housing supply, national policy indicates that there needs to be “compelling evidence that they will provide a reliable source of supply...” and that the allowance “...should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”¹⁹.
- 4.6.3 Where specific major sites (10+ dwellings) have been identified that are expected to contribute to the housing land supply within five years, an allowance has been included. These sites have either been identified through the strategic housing land availability assessment, are on the Councils’ brownfield registers, have permission in principle or are sites where planning permission is likely to be granted imminently. For each of these sites, there is clear evidence that housing completions will begin, and homes will be delivered within the five-year period. Each site within this category was identified as having development potential at the 1st of April base date in line with the monitoring data that underpins this report.
- 4.6.4 The approach to major identified (windfall) sites is considered in accordance with the definition of deliverable in the NPPF.

Figure 4.5: Five-year supply from major identified sites

SOURCE	SOURCE TOTAL	FIVE-YEAR SUPPLY ESTIMATE	DISCOUNTED FIVE-YEAR SUPPLY
Specific identified major sites	603.2	60.0	54

4.7 SITES ALLOCATED IN NEIGHBOURHOOD PLANS

- 4.7.1 At present there are no made Neighbourhood Plans in the East Dorset area and therefore there is no contribution to the supply arising from Neighbourhood Plans.

¹⁹ National Planning Policy Framework 2023, paragraph 72

4.8 RURAL EXCEPTION SITES

4.8.1 In order for a rural exception site to deliver housing, a housing needs survey, grant funding and planning permission is needed. Within East Dorset, there are 3 rural exception sites with 2 of these being delivered as community land trusts.

Figure 4.6: Five-year supply from rural exception sites

SOURCE	SOURCE TOTAL	FIVE-YEAR SUPPLY ESTIMATE	DISCOUNTED FIVE-YEAR SUPPLY
Rural exception sites	42.0	0.0	0

4.9 SUPPLY POSITION AT APRIL 2023

4.9.1 The sources of supply set out in this report have been rigorously assessed against national policy including the definition of deliverable as set out in the NPPF. Due to the uncertainty in accurately predicting the delivery from the various sources of supply, discounts have been applied to each category.

Figure 4.7: Supply position as at 1 April 2023

SUPPLY CATEGORY	FIVE-YEAR SUPPLY ESTIMATE (EXCLUDING DISCOUNT)	DISCOUNTED FIVE-YEAR SUPPLY (2023 TO 2028)
Minor sites with planning permission	322.9	306.7
Major sites with extant planning permission	1,404.2	1,334
Sites allocated within the Local Plan	0	0
Minor sites windfall allowance	201.8	181.6
Specific large sites	60	54
Neighbourhood Plans	0.0	0.0
Rural exception sites	0.0	0.0
TOTAL	1,988.9	1,876.3

4.9.2 The updated position using the most up-to-date information (with a base date of 1 April 2023) indicates that the Councils have a supply equivalent to 1,876.3 dwellings.

5.0 Five-Year Supply Conclusion

5.1 FIVE-YEAR REQUIREMENT AGAINST SUPPLY

- 5.1.1 The requirement to maintain a supply of deliverable sites to cover the five-year period is derived from national policy. As the joint Local Plan for Christchurch and East Dorset was adopted more than five years ago, the five-year supply calculation is based on the Local Housing Need requirement derived through the application of the Standard Methodology. For the East Dorset area only, this gives a housing target of 2,405 dwellings for the period 2023 to 2028 incorporating the housing delivery test buffer of 5% as set out in Figure 3.5. In line with national guidance, no allowance has been made for any shortfall in provision against the Local Plan target due to the Local Housing Need being used. The target is equivalent to 481 dwellings per annum.
- 5.1.2 The supply of deliverable sites that can be counted as being part of the five-year supply for the 2023 to 2028 period is set out in Figure 4.7. After the application of the relevant discounts, the total number of deliverable sites is estimated at 1,876.3 dwellings. This supply calculation is based on sites and information available as at the 1 April 2023 base date.
- 5.1.3 For the period 2023 to 2028 the East Dorset area does not have a sufficient supply to meet the five-year supply requirement as required by national policy. The East Dorset area can demonstrate a supply of deliverable sites equivalent to 3.9 years as shown in Figure 5.1

Figure 5.1: Five-year supply calculation

SUPPLY REQUIREMENT		2,404.9
Annual Housing Requirement	(Local Housing Need)	458.08
Requirement over Five Year Period (2023 to 2028)	458.08×5	2290.4
Plus 5% buffer	$2,290.4 * 1.05$	2,404.92
5-year requirement		2,404.92
Annualised requirement	$2,404.92 \div 5$	480.9
DELIVERABLE SUPPLY (DISCOUNT APPLIED)		1876.3
Minor sites with planning permission		306.7
Major sites with extant planning permission		1,334
Sites allocated within the Local Plan		0
Minor sites windfall allowance		181.6
Specific large sites		54
Neighbourhood Plans		0.0
Rural exception sites		0.0
CALCULATION OF FIVE-YEAR SUPPLY		
Deliverable Supply ÷ Annualised requirement	$1,876.3 \div 480.9$	3.9years

Appendix A. Minor sites with extant permission

A.1 Minor sites (1 to 9 dwellings) which benefit from planning consent and are considered deliverable within five years.

Status	Address	Application Number	Settlement	Estimated delivery within 5 years
n/s	58 Ringwood Road (moved due to Nat England)	3/19/2171/OUT	Alderholt	4
u/c	24A Stour View Gardens/ 91 Wimborne Road	3/19/0545/RM	Corfe Mullen	3
n/s	Smugglers Hyde 47 Brook Lane	3/19/0382/FUL	Core Mullen	1
n/s	The Old Mill, Mill Street, Corfe Mullen, Wimborne, Dorset, BH21 3RH	3/19/0810/FUL	Corfe Mullen	2
n/s	2 Blythe Road, Corfe Mullen, Wimborne, BH21 3LR	3/20/0555/PNDEM	Corfe Mullen	1
n/s	11 Highfield Close, Corfe Mullen, Wimborne, BH21 3JE	3/21/1447/FUL	Corfe Mullen	1
u/c	15 Croft Close, Corfe Mullen, Wimborne, BH21 3JE	3/21/1447/FUL	Corfe Mullen	1
u/c	Land to the North of Pardys Hill, West of Sleight Lane, Corfe Mullen, Dorset	3/21/1594/RM	Corfe Mullen	9
n/s	67 Albert Road, Corfe Mullen, Wimborne, BH21 3QE	3/19/1859/OUT	Corfe Mullen	1
n/s	17 Ridgeway, Corfe Mullen, Wimborne, Dorset, BH21 3HS	3/20/0192/OUT	Corfe Mullen	1
n/s	2 Home Farm Cottages, Waterloo Road, Corfe Mullen, Wimborne, BH21 3SN	3/21/0146/FUL	Corfe Mullen	1
u/c	9 Ridgeway, Corfe Mullen, Wimborne, BH21 3HS	3/21/1209/FUL	Corfe Mullen	3
u/c	29 Hanaham Road, Corfe Mullen, Wimborne, BH21 3PX	3/21/1294/FUL	Corfe Mullen	3
u/c	27 Corfe View Road, Corfe Mullen, BH21 3NG	3/21/0779/FUL	Corfe Mullen	1
n/s	Land Rear of 1 East Way, Corfe Mullen, Wimborne, BH21 3NA	P/FUL/2021/04216	Corfe Mullen	1
n/s	26 Corfe View Road, Corfe Mullen, Wimborne, BH21 3NA	P/FUL/2022/02300	Corfe Mullen	1
n/s	Caretakers Flat, Castle Court School, Knoll Lane, Corfe Mullen, Wimborne, BH21 3RF	P/FUL/2022/02300	Corfe Mullen	1
n/s	150 Leigh Road Wimborne Minster BH21 2DB	P/FUL/2021/03858	Wimborne Minster	-1
n/s	20-23 East Street	3/17/3058/FUL	Wimborne Minster	15
n/s	Vacant Land Brook Road, Wimborne, BH21 2FR	3/20/2119/FUL	Wimborne Minster	1
n/s	Crown House, 6 Wimborne Road, Wimborne Minster, Wimborne, BH21 1NN	3/20/1321/PNOD	Wimborne Minster	6

n/s	14 King Street, Wimborne Minster, Wimborne, Dorset, BH21 1DY	3/18/2716/FUL	Wimborne Minster	3.2
n/s	Existing Car Park located to the South/West of Tapper Court	3/19/0005/FUL	Wimborne Minster	2
n/s	Hayeswood County First School, Cutlers Place, Colehill, Wimborne, Dorset, BH21 2HN	3/19/0862/FUL	Colehill	1
n/s	Uddens Lake, Uddens Drive, Colehill, BH21 7BH	3/20/0469/FUL	Colehill	1
n/s	41c East Street, Wimborne Minster, Wimborne, BH21 1DX	3/20/2113/FUL	Wimborne Minster	2
n/s	The Coach House, 2 Rowlands Hill, Wimborne Minster, Wimborne, BH21 1AN	01/11/2021	Wimborne Minster	1
n/s	19 & 19a Wimborne Road, Wimborne Minster, Wimborne, Dorset, BH21 1NP	3/20/0741/FUL	Wimborne Minster	1
n/s	37 Barnes Crescent, Wimborne Minster, BH21 2AY	P/FUL/2021/04105	Wimborne Minster	2
n/s	Land West of 38 Canford Bottom, Colehill, Dorset, BH21 2HD	p/FUL/2022/01877	Colehill CP	4
n/s	Stocks Cottage, Furzehill, Colehill, Wimborne, BH21 4HD	P/FUL/2022/02242	Colehill CP	2
n/s	58 Lonnen Road, Colehill, Wimborne, BH21 7AX	P/FUL/2022/05316	Colehill CP	1
n/s	Cutting Edge, 105 Wimborne Road West, Canford Bottom, Wimborne, BH21 2DH	P/FUL/2022/05437	Colehill CP	3
n/s	5 Gordon Road, Wimborne Minster, BH21 2AP	3/21/1574/FUL	Wimborne Minster	1
n/s	1 East Borough, Wimborne Minster, Wimborne, BH21 1PA	3/21/1702/FUL	Wimborne Minster	2
n/s	32-34 Rowland Hill, Wimborne Minter, BH21 1AW	P/FUL/2002/03969	Wimborne Minster	8
n/s	2 Rowlands Hill, Wimborne Minster, Dorset, BH21 1AN	P/FUL/2022/07704	Wimborne Minster	1
u/c	Land to the west of Brook Road (to the rear (east) of 33 and 35 Barnes Crescent).	3/17/0920/FUL	Wimborne Minster	1
u/c	Land off Brook Road, near of 33 Barnes Crescent	3/19/0296/FUL	Wimborne Minster	3
u/c	r/o 77 Barnes Crescent	3/19/0533/FUL	Wimborne Minster	1
u/c	Boundary House, Boundary Drive, Colehill, Wimborne, BH21 2RE	3/20/1382/FUL	Colehill	1
u/c	Crofton, Furzehill, Colehill, Wimborne, BH21 4HD	3/20/1355/RM	Furzehill	4
u/c	r/o 6 Livingstone Road, Wimborne Minster, Wimborne, BH21 2AX	3/20/1809/FUL	Wimborne Minster	1
u/c	4 Hayes Lane, Canford Bottom, Wimborne, BH21 2JE	3/21/0255/FUL	Colehill	2
u/c	28 West Borough, Wimborne Minster, Wimborne, BH21 1NF	3/20/1252/FUL	Wimborne Minster	1

u/c	6 Hayes Lane, Canford Bottom, Wimborne, BH21 2JE	3/21/0232/FUL	Colehill	1
u/c	19 Wimborne Road, Wimborne Minster, Wimborne, BH21 1NP	3/21/0256/FUL	Wimborne Minster	2
u/c	118 and 120, Middlehill Road, Colehill, BH21 2HG	P/FUL/2022/01037	Colehill	2
u/c	Beechcroft, Northleigh Lane, Colehill, Wimborne, BH21 2PN	P/FUL/2022/02485	Colehill	1
u/c	64 and 66 Barnes Crescent, Wimborne Minster, Wimborne, Dorset, BH21 2AZ	P/FUL/2022/01290	Wimborne Minster	3
u/c	Land to the r/o 41 Barnes Crescent, Wimborne, BH21 2AY	P/FUL/2022/02687	Wimborne Minster	2
n/s	Plot Adj 11 Fernlea Close	3/19/2286/OUT	Ferndown	1
n/s	9 Fernlea Close Ferndown	3/19/2285/OUT	Ferndown	4
n/s	434 Ringwood Road, Ferndown, BH22 9AY	3/20/0566/FUL	Ferndown	1.1
n/s	406 Ringwood Road, Ferndown, BH22 9AU	P/FUL/2021/04095	Ferndown	3
n/s	135-137 Christchurch Road, West Parley, Ferndown, BH22 8TB	3/20/2061/FUL	West Parley	7
n/s	4 Golf Links Road, Ferndown, BH22 8BY	3/21/0638/FUL	Ferndown	4
n/s	11 Fernlea Close	3/19/2344/FUL	Ferndown	4
n/s	Bedborough Farm, Uddens Drive, Colehill, Wimborne, BH21 7BQ	3/21/1277/FUL	Ferndown	2
n/s	442 Ringwood Road, Ferndown, BH22 9AY	3/21/1471/FUL	Ferndown	3
n/s	Kingsland House, 512-514 Wimborne Road East, Ferndown, BH22 9NG	P/FUL/2021.04212	Ferndown	6
n/s	Stapehill Farm, Uddens Drive, Hampreston, Wimborne, BH21 7BE	P/FUL/2021/04936	Ferndown	1
n/s	Land Rear of 68 Victoria Road, Ferndown, BH22 9JA	P/FUL/2022/04737	Ferndown	0.55
n/s	Amberwood House Care Home, 418 Ringwood Road, Ferndown, BH22 9AX	P/FUL/2022/07414	Ferndown	4
n/s	84 Golf Links Road, Ferndown, BH22 8BZ	3/19/0460/OUT	Ferndown	5
u/c	Stourvale Nursery, Church Lane	3/15/0458/PMBPA	West Parley	1
u/c	578 Wimborne Road East, Ferndown, BH22 9NN	3/20/1325.FUL	Ferndown	8
u/c	1 Christchurch Road, Longham, Ferndown BH22 8TD	3/20/0860/FUK	Ferndown	1
u/c	4-16 Victoria Road	3/19/1972/RM	Ferndown	3
u/c	The Barn, 339 Ringwood Road	3/19/1271/CONDR	Ferndown	1
u/c	131 Christchurch Road	3/19/1337/FUL	Ferndown	1
u/c	52 Golf Links Road	3/15/0723/FUL	Ferndown	7
u/c	14 Golf Links Road	3/17/1949/FUL	Ferndown	1
u/c	6 Stour Close, Little Canford	3/17/2071/FUL	Ferndown	1
n/s	Forest Pines Riding Stables Wayside Road, St Leonards and St Ives, Ringwood, BH24 2SH	3/19/2235/FUL	St Leonards & St Ives	1

n/s	74 Woolsbridge Road, Ashley Heath, Ringwood, BH24 2LX	3/21/0770/FUL	St Leonards & St Ives	5
n/s	22 Bushmead Drive, Ashley Heath, BH24 2HU	3/21/1586/FUL	St Leonards & St Ives	2
n/s	89 Woolsbridge Road, Ashley Heath, Ringwood, BH24 2LY	P/FUL/2021/05009	St Leonards & St Ives	2
n/s	19 Cedar Avenue, St Leonards and St Ives, Ringwood, BH24 2QF	P/FUL/2021/05119	St Leonards & St Ives	1
n/s	151 Sandy Lane and Land rear of 2 Woodlands Way, St Leonards and St Ives, BH24 2LH	3/21/1675/FUL	St Leonards & St Ives	2
n/s	44 Avon Castle Drive, Ashley Heath, Ringwood, BH24 2SH	3/21/0395/FUL	St Leonards & St Ives	1
n/s	Forest Pines Riding Stables, Wayside Road, St Leonards and St Ives, Ringwood, BH24 2SH	3/19/2235/FUL	St Leonards & St Ives	1
n/s	11 Cherry Tree Close, St Leonards and St Ives, Ringwood, BH24 2QN	3/21/1770/FUL	St Leonards & St Ives	1
n/s	27 Oaks Drive, St Leonards and St Ives, Ringwood, BH24 2QR	P/FUL/2022/04769	St Leonards & St Ives	4
n/s	2 Strode Gardens, St Leonards and St Ives, Ringwood, BH24 2LF	P/FUL/2022/04775	St Leonards & St Ives	1
n/s	Casa Mianda, 7 Badgers Close, Ashley Heath, Ringwood, BH24 2JH	P/FUL/2021/05673	St Leonards & St Ives	1
n/s	Land to the rear of 7 Ashley Drive North, Ashley Heath, Ringwood, BH24 2JL	3/21/1584/FUL	St Leonards & St Ives	1
n/s	15 Braeside Road, St Leonards and St Ives, Ringwood, VH24 2PQ	3/21/0061/PIP	St Leonards & St Ives	1
u/c	Petherton Cottage, Horton Road, Ashley Heath, Ringwood, BH24 2ED	3/21/0076/FUL	St Leonards & St Ives	1
u/c	Land Adjacent 29 Sandy Lane, St Leonards and St Ives, Ringwood, BH24 2HU	P/FUL/2021/03883	St Leonards & St Ives	1
u/c	20 Bushmead Drive, Ashley Heath, Ringwood, BH24 2HU	3/21/0445/FUL	St Leonards & St Ives	2
u/c	103 Woolsbridge Road, Ashley Heath, Ringwood, BH24 2LZ and Land at the rear of 34 and 36, The Glade, BH24 2HR	3/21/0416/FUL	St Leonards & St Ives	1
u/c	9 Boundary Lane	3/16/2790/FUL	St Leonards & St Ives	1
u/c	64 Churchill Close	3/20/1194/FUL	Sturminster Marshall	2
u/c	20 Churchill Close & Land to the rear of 21 & 22 Churchill Close, Sturminster Marshall, Wimborne, BH21 4BQ	3/20/0478/FUL	Sturminster Marshall	4
n/s	Dorset Springs, Poole Road, Sturminster Marshall, Wimborne, BH21 4BQ	3/21/0722/FUL	Sturminster Marshall	1
n/s	Churchill Arms Public House, Station Road, Sturminster Marshall	3/20/2184/FUL	Sturminster Marshall	1

u/c	Land East of Sheridan Way,	3/11/0133/FUL	Sturminster Marshall	7
n/s	9 Kings Street, Sturminster Marshall, Wimborne, BH21 4BJ	3/21/0140/FUL	Sturminster Marshall	1
n/s	Millmoor Farm, Kings Street, Sturminster, Marshall, BH21 4BN	P/FUL/2022/00559	Sturminster Marshall	1
n/s	4 High Close, Sturminster Marshall, Dorset, BH21 4BE	P/FUL/2022/05385	Sturminster Marshall	1
n/s	97 High Street, Sturminster Marshall, Wimborne, BH21 4AT	P/OUT/2021/04873	Sturminster Marshall	3
n/s	Stables, Heathlands, Lower Common Lane, Three Legged Cross, Dorset, BH21 6RX	3/19/1304/FUL	Verwood	1
n/s	21 Burnbake Road, Verwood, BH31 6ER	3/21/1674/FUL	Verwood	1
n/s	Providence Villa, 5 West Moors Road, Three Legged Cross, Wimborne, BH21 6QT	3/20/1552/OUT	Verwood	4
u/c	81 Church Road, Three Legged Cross, Wimborne, Dorset, BH21 6RQ, appeared to have changed mine – new sites site notice up	3/19/2263/FUL	Verwood	1
u/c	19 & 21 Woodlinken Drive	3/19/0601/FUL	Verwood	1
u/c	Eastworth Farm, 52 Edmondsham	3/19/2233/FUL	Verwood	1
u/c	Land to the rear of 7, 9, and 19 Woodlinken Drive, (5 and 6 The Willows), Verwood, BH31 6BN	3/21/0051/FUL	Verwood	2
u/c	Eastworth Farm, 52 Edmondsham Road, Verwood, BH31 7PB	3/21/1012/FUL	Verwood	2
u/c	11 Woodlinken Drive (7 The Willows), Verwood, BH31 6BN	P/FUL/2021/03857	Verwood	1
u/c	55 Lake Road, Verwood, BH31 6BX	3/21/1839/FUL	Verwood	1
u/c	Land to the front and side of Old Oaks, Eastworth Road, Verwood, BH31 7PJ	P/FUL/2021/05633	Verwood	1
u/c	Plot 4, Land to the rear of NO.5, Woodlinken Drive, Verwood, BH31 6BW	P/FUL/2022/01599	Verwood	1
u/c	Four Winds, Dewlands Road, Verwood, BH31 6PN	P/FUL/2022/04242	Verwood	2
u/c	44 Lake Road, Verwood, BH31 6BX	P/FUL/2022/006625	Verwood	-1
n/s	Parking Area off Hardy Road, West Moors, Ferndown, Dorset, BH22 0EX	3/19/2018/FUL	West Moors	1
n/s	76 Farm Road, West Moors, Ferndown, BH22 0JL	3/21/0236/FUL	West Moors	1
n/s	7 Abbey Road, West Moors, Ferndown, BH22 0AU	P/FUL/2021/05574	West Moors	1
n/s	Standford House, Three Cross Road, West Moors, Dorset, BH21 6QW	P/PAAC/2022/077	West Moors	1
n/s	30 Oakhurst Lane, West Moors, Ferndown, BH22 0DT	P/OUT/2022/0336	West Moors	1
u/c	2 Abbey Road, West Moors, Ferndown, BH22 0AU	3/21/0382/FUL	West Moors	2
u/c	18 Uplands Road, West Moors, Ferndown, BH22 0BB	3/19/2458/FUL	West Moors	1

u/c	189 Uplands Road	3/18/1438/FUL	West Moors	1
u/c	77 Elmhurst Road, West Moors, Ferndown, BH22 0DG	p/FUL/2022/0220	West Moors	2
u/c	19 Oakhurst Lane, West Moors, Ferndown, BH22 0DT	P/FUL/2002/03168	West Moors	1
n/s	Grange Farm, Colehill, Wimborne, BH21 4HX	3/19/2378/FUL	Holt CP	9
n/s	4 Sheepcroft Lane, Holt, Wimborne, BH21 7DA	3/20/0978/FUL	Holt CP	1
n/s	Barn C, Brooklands Farm, Horton, Wimborne, BH21 7JU	3/20/2244/PNAGD	Holt CP	1
n/s	Frogmore Lane, Sixpenny Handley, Salisbury, SP5 5NY	3/20/1328/FUL	Sixpenny Handley and Pentridge CP	7
n/s	Brooklands Farm (Barn A), Horton, Wimborne, BH21 7JU	3/21/1389/FUL	Holt	1
n/s	Vicarage Farm, Harts Lane, Holt, Dorset, BH21 7DH	P/PAAC/2022/05988	Holt CP	1
n/s	Barn at Land off Bakers Lane, Holtwood, BH21 7BY	P/FUL/2022/07956	Holt CP	1
n/s	Manor Farm, Horton, Dorset, BH21 7JA	P/FUL/2022/07956	Horton CP	1
n/s	Thorneydown Farm, A354 From Handley Cross to the Access to Chapel, Down Farm, Woodcutts, Dorset, SP5 5RX	P/FUL/2022/05026	Sixpenny Handley and Pentridge CP	2
u/c	Framptons Yard	3/19/0826/FUL	Holt	4
u/c	Little Owls Farm	3/19/0777/RM	Holt	5
n/s	Underwood Farm, Hinton Martell, BH21 4JL	3/20/0799/FUL	Hinton Martell	1
n/s	Barns to the North West of Millum House, Hinton Martell, Wimborne, BH21 7HE	3/20/0663/OUT	Hinton Martell	2
n/s	Witchampton Methodist Church, Chapel Row, Witchampton, BH21 5AL	3/20/0921/FUL	Witchampton CP	1
n/s	Pound Farm, Hinton Martell, Wimborne, BH21 7HP	3/21/0304/FUL	Hinton CP	1
n/s	North Farm, Gussage All Saints, Wimborne, BH21 5JE	3/21/0689/FUL	Gussage ST Michael CP	1
n/s	Loverly Farm, Moor Crichel, Wimborne, BH21 5EB	P/FUL/2021/05634	Gussage All Saints CP	2
u/c	Land at Summer Hill, War Memorial to Amen Corner, Street Gussage All Saints, BH21 5ET	3/19/2499/FUL	Gussage All Saints CP	1
u/c	Land Adjoining Summerhill, Gussage All saints, Dorset, BH21 5ET	3/19/2499/FUL	Gussage All Saints CP	2

u/c	Land To the North East of Tonbridge, Custard Hill, Gussage All Saints, Bh21 5ES	3/20/0660/FUL	Gussage All Saints	1
u/c	Sunny Patch, Witchampton, Wimborne, Bh21 5AZ	3/21/0943/FUL	Witchampton CP	1
u/c	Hinton Mill Farm, Mill Lane, B3078 to Hinton Mill Farm, Access Road, Hinton Parva, Witchampton, Wimborne, BH21 4JG	3/20/0929/FUL	Hinton CP	9
			Total	322.9

Appendix B. Major sites with extant planning permission

B.1 Major sites (10 + dwellings) which benefit from planning consent and are considered deliverable within five years.

Status	Address	Application Number	Settlement	Estimated delivery within 5 years
n/s	Land North of Ringwood Road, Alderholt, SP6 3HZ	3/16/1446/OUT	Alderholt	45
n/s	Alderholt Surplus Stores, Draggons Road, Alderholt, SP6 3TB	3/17/1644/NMA	Alderholt	89
u/c	Charris Caravan and Camping Park, Candys Lane	3/18/1594/CLP	Corfe Mullen	6
u/c	Land to the North of Wimborne Road (New neighbourhood Lockyers School Corfe Mullen)	3/20/0667/RM	Corfe Mullen	34
u/c	Land to the East and West of Cranborne Road (Cranborne Road New Neighbourhood) (WMC7)	3/19/2437/RM	Wimborne	228
u/c	Land adjacent to Julians Road, Cowgrove Road and the River Stour (Cuthbury Allotments New Neighbourhood WMC5)	3/19/2449/FUL	Wimborne	77
u/c	Land South of Leigh Road (S of Leigh Rd new neighbourhood) (WMC8) – Care Home Appeal	3/19/2449/FUL	Wimborne	35.55
u/c	Park Farm, Leigh Road (S of Leigh Road New Neighbourhood) (WMC8)	3/18/2262/RM	Wimborne	98
u/c	Wimborne Market, Station Terrace, Wimborne	3/21/1556/FUL	Wimborne	108
n/s	Land South of Leigh Road (S of Leigh Road new neighbourhood) (WMC8)	3/17/0848/FUL	Wimborne	44
n/s	Land South of Leigh Road (S of Leigh Road new neighbourhood) (WMC8)	3/18/3305/FUL	Wimborne	157
u/c	The Warren (Phase B,C)	3/97/0742/REM	Ferndown	14
u/c	The Warren (Phase E)	3/06/0395/REM	Ferndown	25
u/c	1 Carroll Avenue & 430 Ringwood, Ferndown	3/16/1306/FUL	Ferndown	15
u/c	Land East of New Road, West Parley (FWP6) – Phase 1	P/RES/2022/03505	Ferndown/West Parley	256
n/s	Land East of New Road, West Parley (FWP6) [remaining Phases on allocation sites)	3/17/3609	West Parley	40
n/s	180 Ringwood Road	3/19/1861/OUT	Ferndown	15.67
u/c	Land at Lone Pines Close, Matchams Lane, Hurn, Christchurch, Dorset, BH23 6LP	3/19/1124/CLP	St Leonards & St Ives	10
n/s	Land south of Howe Lane	3/19/0019/RM	Verwood	29
u/c	Land North and South Edmondsham Road (NW Verwood New Neighbourhood) – Phase 2	3/19/2512/RM	Verwood	50

u/c	Land to south site of Horton Road, Three legged Cross	3/18/1746/CLP	Knowlton	28
			Total	1,404.2

Appendix C. Sites allocated within the Local Plan

- C.1 Sites allocated in the adopted Christchurch and East Dorset Core Strategy including site located only in the East Dorset area.

Status	Address	Application Number	Settlement	Estimated delivery within 5 years
			Total	0

Appendix D. Minor sites windfall allowance

- D.1 The contribution that minor windfall sites make to the supply was assessed by looking at the actual delivery of new homes on sites of 1 to 9 dwellings over the previous five-year period (i.e. from 2018/19 to 2022/23) on a settlement by settlement basis. This analysis identified an overall rate of windfall delivery across the East Dorset area and on a settlement by settlement basis.
- D.2 The windfall rates outlined in Figure D1 were applied using the build-out rates for minor sites. The build-out rates were established by looking at the date when planning permission was granted and assessing the number of years before each site was completed. For example, a site granted permission in 2019 and built in 2021 took two years to complete.

Figure D1: Windfall rates – dwellings

	2018/19	2019/20	2020/21	2021/22	2022/23	FIVE-YEAR AVERAGE
Alderholt*	6.0	5.0	2.0	1.0	1.0	5.6
Corfe Mullen	3.0	4.0	3.0	8.0	0.0	2.4
Colehill/Wimborne	18.0	34.0	25.0	21.0	12.0	21.4
Ferndown	22.0	18.0	4.0	27.0	25.3	10.8
Holt, Knowlton & Sixpenny Handley	6.0	9.0	3.0	6.0	6.0	7.0
St Leonards & St Ives	11.0	7.0	10.0	3.0	10.0	10.0

Sturminster Marshall	1.0	5.0	8.0	2.0	0.0	4.2
Verwood	7.0	4.0	3.6	2.0	13.0	6.7
West Moors	4.0	1.0	13.0	2.0	3.0	3.8
Rural (inc Vale of Allen, Pampill and Cranborne)	1.0	5.0	4.0	3.1	1.0	2.8
East Dorset (Small sites)	79.0	92.0	75.6	75.1	71.3	74.7

*Alderholt windfall has been removed as a result of nutrient neutrality constraints from the 5YHLS calculation.

- D.3 The percentage of all minor sites built likely to be built in any particular year was then calculated to give the build-out profile for minor sites as detailed in Figure D2. For Wimborne and Colehill, typically 10% of all minor sites granted permission within one year, would be completed within that same year. By the end of the next year a further 40% would have been completed leading to a cumulative total of 50% of all minor sites completed within the first 2 years of permission and so on with 96% of minor sites on average being completed by year 5.
- D.4 When applying the windfall and build-out rates, the total number of units expected to be completed each year can be estimated. Within each year, an additional supply of sites would be granted permission on top of those already granted permission in the preceding year further adding to the number of sites being completed each year. Figure D3 shows the estimated completions for Wimborne and Colehill through the application of the windfall rate and the build-out rate.

Figure D2: Cumulative build-out rate for minor sites

YEARS TO COMPLETE FROM GRANT OF PERMISSION	YEAR 0	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6	YEAR 7	YEAR 8	YEAR 9	YEAR 10
Alderholt	13.3%	53.3%	66.7%	80.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Corfe Mullen	9.1%	45.5%	68.2%	81.8%	90.9%	95.5%	95.5%	95.5%	95.5%	95.5%	95.5%
Colehill/Wimborne	11.0%	47.9%	79.5%	90.4%	94.5%	95.9%	98.6%	98.6%	100.0%	100.0%	100.0%
Ferndown/West Parley	22.7%	53.0%	77.3%	92.4%	97.0%	98.5%	98.5%	100.0%	100.0%	100.0%	100.0%
Holt, Knowlton & Sixpenny	16.7%	26.7%	70.0%	96.7%	96.7%	96.7%	100.0%	100.0%	100.0%	100.0%	100.0%
St Leonards & St Ives	12.8%	55.3%	83.0%	93.6%	97.9%	97.9%	97.9%	100.0%	100.0%	100.0%	100.0%
Sturminster Marshall	7.7%	46.2%	84.6%	84.6%	92.3%	92.3%	92.3%	100.0%	100.0%	100.0%	100.0%
Verwood	32.4%	70.6%	88.2%	94.1%	94.1%	97.1%	97.1%	97.1%	97.1%	97.1%	97.1%
West Moors	21.4%	57.1%	85.7%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Rural	21.1%	73.7%	84.2%	89.5%	89.5%	94.7%	100.0%	100.0%	100.0%	100.0%	100.0%
Total	17.1%	52.3%	79.0%	91.3%	95.5%	97.0%	98.2%	99.1%	99.4%	99.4%	99.4%

Figure D3: Estimated windfall delivery for a typical five-year period – Wimborne and Colehill

YEAR OF GRANT OF PERMISSION	SUPPLY IN YEAR 1	SUPPLY IN YEAR 2	SUPPLY IN YEAR 3	SUPPLY IN YEAR 4	SUPPLY IN YEAR 5	TOTAL IN 5 YEARS
Year 0	11.0%	37.0%	31.5%	11.0%	4.1%	94.5%
Year 1		11.0%	37.0%	31.5%	11.0%	90.4%
Year 2			11.0%	37.0%	31.5%	79.5%
Year 3				11.0%	37.0%	47.9%
Year 4					11.0%	11.0%
Cumulative Total	11.0%	47.9%	79.5%	90.4%	94.5%	
Wimborne and Colehill annual windfall rate = 22.0 dwellings per annum						
Profiled windfall delivery (dwellings)						
Year 0	2.4	8.1	6.9	2.4	0.9	20.7
Year 1		2.4	8.1	6.9	2.4	19.8
Year 2			2.4	8.1	6.9	17.4
Year 3				2.4	8.1	10.5
Year 4					2.4	2.4
Total windfall allowance	2.4	10.5	17.4	19.8	20.7	70.8

D.5 Although the above windfall allowance and build-out rates are based on detailed assessment of past delivery, the numbers of windfall sites each year will most likely change and therefore the overall windfall rate has been discounted by 10%. In addition, the small consented sites will form part of the windfall and therefore to avoid double counting, no windfall allowance has been included in the first two years.

D.6 Windfall rates for each settlement are based on the five-year rolling average of completed new dwellings for each area. This approach will ensure that the allowance reflects as closely as possible actual delivery rates, allowing for fluctuations in the supply that may occur over time.

Appendix E. Specific large windfall sites

E.1 Specific larger sites (10+ dwellings) that are considered deliverable within five years.

Status	Address	Application Number	Settlement	Estimated delivery within 5 years
n/s	Land to North of Eastworth Farm (LIS_V3)	P/FUL/2022/03125	Verwood	38
n/s	Land at Back Lane (site 1)	P/FUL/2021/05768	Sixpenny Handley	22
			Total	60

Appendix F. Sites allocated in Neighbourhood Plans

F.1 Sites allocated in made Neighbourhood Plans that are considered deliverable within five years.

ADDRESS	SETTLEMENT	ESTIMATED DELIVERY WITHIN 5 YEARS
No made Neighbourhood Plans at present		0

Appendix G. Rural exception sites

G.1 Rural exception sites that are considered deliverable within five years.

ADDRESS	SETTLEMENT	ESTIMATED DELIVERY WITHIN 5 YEARS
	Total	0



Dorset Council

Housing Delivery Test Action Plan

March 2024

www.dorsetcouncil.gov.uk

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1. Introduction

- 1.1.1. Throughout recent years various Government programmes have come forward with the aim of helping support the objective of significantly boosting the supply of new homes. Furthermore, there has been ongoing reform of the planning system which aim to stimulate and support the delivery of new homes.
- 1.1.2. As part of its reforms of the planning system, the Government introduced the 'Housing Delivery Test' (HDT) in 2018 as a mechanism to measure delivery against targets. This HDT measures net additional dwellings delivered against the homes required for each local planning authority in England with results issued annually.¹ At the time of writing this report, the 2022 results were the latest published, being published in December 2023. Dorset Council monitors housing delivery each year and submits returns through the Housing Flow Return to Government. The most recent return was for the monitoring year 01 April 2022 to 31 March 2023, but the corresponding HDT results have not yet been published.
- 1.1.3. The results of the HDT have implications for local planning authorities. If the results of the HDT are less than 95%, an Action Plan should be published. Paragraph 047 of the National Planning Practice Guidance sets out that:

“The action plan is produced by the local planning authority where delivery is below 95% of their housing requirement. It will identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery²”.
- 1.1.4. An Action Plan is intended to be a practical document, focused on effective measures aimed at improving housing delivery within an area. This is a Dorset Wide Action Plan incorporating the delivery information for the legacy authority areas of North Dorset, East Dorset, Purbeck, West Dorset and Weymouth and Portland.

¹ Measurements for the Dorset Council area are based on the legacy local authority boundaries prior to local government reorganisation in 2019.

² Paragraph: 047 Reference ID: 68-047-20190722 of planning policy guidance

2. Housing delivery in the Dorset Council area

Latest Performance against the Housing Delivery Test

- 2.1.1. The area covered by Dorset Council is largely rural in character and it has a high quality natural and historic environment. Much of Dorset's landscape, is subject to national designations and there are multiple sites protected for their international wildlife value. One of the key challenges in planning for the area is managing the level of housing growth within the many environmental designations that exist.
- 2.1.2. Nevertheless, the need to deliver housing, particularly affordable housing, is an important issue for Dorset Council especially given the affordability problems relating to housing in Dorset. A failure to deliver sufficient new homes is likely to negatively impact on the economy, productivity, health, and well-being.
- 2.1.3. Whilst the predecessor Councils identified sites and planned for growth, actual delivery rates over recent years have not always matched those set out in planning policy. The latest performance against the HDT, based on predecessor Councils' boundaries, are set out below.

Table 1: Housing Delivery Rates

Area of Dorset based on predecessor Councils boundaries	Housing Delivery Test Results (2022 Measurement)
East Dorset ³	90%
North Dorset	75%
Purbeck	93%
West Dorset, Weymouth and Portland ⁴	113%

- 2.1.4. These are the official Housing Delivery Test results published by Government for the 2022 measurement year. Data is now available for the 2023 measurement year which suggests that the result for North Dorset would exceed the 100% housing delivery target.

³ The HDT result for East Dorset has been measured jointly with Christchurch on the basis that there is currently a joint plan for the Christchurch and East Dorset Area.

⁴ The HDT result for East Dorset has been measured jointly with Christchurch on the basis that there is currently a joint plan for the Christchurch and East Dorset Area.

2.1.5. The NPPF places a requirement on local planning authorities to produce a Housing Delivery Test Action Plan where housing delivery is below 95% of the housing requirement. The published data shows that the West Dorset Weymouth and Portland area met its respective requirement for the 2022 measurement year and therefore a Housing Delivery Test Action Plan is not needed for this area. For East Dorset, North Dorset and Purbeck, an Action Plan needs to be produced to respond to the shortfall in delivery. Table 2 describes issues relating to housing delivery across the East Dorset, North Dorset and the Purbeck Area but many of these equally apply across the whole of the Dorset Council area. This Action Plan has therefore been written to cover the whole of the Dorset Council area.

Table 2: Issues Relating to Housing Delivery

1. **Planning Constraints and Policy:** The Council continues to liaise with a range of key stakeholders involved in the planning process to better understand the key factors influencing housing delivery rates in Dorset. Information gathered has been considered alongside direct knowledge of local sites, land and development activity in order to fully understand the reasons for under-delivery.

No.	Type of Constraints	Description
A	Plan Making	The Council is continuing to progress with the development of the Dorset Council Local Plan, that once adopted, will supersede all of the existing Local Plans for West Dorset, Weymouth and Portland, North Dorset, Purbeck and East Dorset. The Local Development Scheme (LDS) 2024 sets out the timetable for Dorset Councils progress with the emerging Local Plan. The revised LDS states that the Dorset Council Local Plan will be submitted to the Secretary of State for examination in the Winter of 2026, with the view that it will be adopted in 2027. It is worth mentioning, that the new NPPF was recently published, and this will change the contents of Local Plans and how these should be examined. At the time of writing, we are waiting for further details on these changes to be published. This expected change, with the adopted Levelling Up and Regeneration Act (LURA) and further guidance on nutrient neutrality and Local Government Elections taking place in May 2024, may impact on the Dorset Wide Local Plan delivery. Any delays to the delivery of the Local Plan may impact on allocating sites to achieve housing targets across Dorset.

B	Nutrients and Levelling Up and Regeneration Act	<p>A significant constraint affecting the deliverability of sites within the Dorset Council area is nutrient neutrality⁵ following the advice issued by Natural England on 16 March 2022. Since this was issued, the Government have put in measures to help to unblock housing sites. The approach Dorset Council is taking in each of the 5 catchments that affect Dorset (River Axe, River Avon, Chesil & The Fleet, Somerset Levels and Moors and Poole Harbour Catchment) is different due to the nature of the catchments and the different working arrangement within neighbouring Local Authorities that share the catchment area. For the Poole Harbour catchment, Dorset Council and Natural England’s position is that if sufficient wastewater treatment works are required to be upgraded within the catchment through the LURA, the need for development to demonstrate phosphorous neutrality will be removed. An announcement is to be made by the Secretary of State on or before the 1 April 2024 which will clarify the position on phosphorus within the Poole Harbour catchment. Dorset Council (for the Poole Harbour catchment), Somerset Council (for the Somerset Levels and Moors catchment) and Wiltshire Council (for the River Avon catchment) have been awarded funds to deliver nutrient mitigation. Nutrient Neutrality has resulted in delays with the emerging Purbeck Local Plan (2018-2034) examination. Nutrient neutrality has also acted as a significant impediment to the progression of the Dorset Council Local Plan.</p>
C	Designations; Green Belt, Area of Outstanding Natural Beauty (AONB) and Habitats	<p>Greenbelt and AONB designations cover much of the former East Dorset area and act as a barrier to significant levels of housing development. Many of the straightforward development sites allocated within the adopted East Dorset Local Plan have now been built, leaving those that are more difficult to develop. This has resulted in the rate of delivery in the former East Dorset area slowing. Similar issues exist in the former Purbeck area where much of the plan area are covered by the Greenbelt and AONB. Major development within the Greenbelt and AONB would require exceptional circumstances to be demonstrated and this is best achieved through the production of a Local Plan, should evidence support this.</p>

⁵ The approach advocated by Natural England is that any development that leads to an increase in nutrient loading within the catchment of one of the freshwater or estuarine habitats are in unfavourable condition, should be nutrient neutral. This would result in no net increase in nutrients entering the protected habitat sites arising from development via both wastewater and surface water flows.

2. **Infrastructure and Public Services:** Delivering infrastructure ahead of development can help to de-risk sites and speed up the delivery of housing on large sites. Although Dorset Council supports such an approach, a number of key challenges remain.

No.	Type of Constraints	Description
A	Impacts on existing infrastructure and services	Both large and small sites can have an impact on existing infrastructure and public services, which can slow delivery and negatively impact on local service capacity particularly where challenges exist to increase capacity.
B	Slow delivery of larger sites	Larger sites are often built out more slowly than anticipated. This is partly due to issues surrounding the amount of infrastructure that is required to support such development. It is recognised that providing infrastructure up front does de-risk sites and speed up delivery but it's not commonplace because the cost of doing so often has a negative bearing on cash flow and development viability. We commonly see less essential infrastructure timed to come forward when the development makes a return, i.e. completion or occupation. We also need to ensure that other infrastructure providers are aware of plans for growth. Developer contributions are just that, they are typically not sufficient to cover the total cost of infrastructure and are reliant on other public sector funds.
C	Agreement with external bodies	Given the nature conservation designations, including European sites both within and in close proximity to the plan area, developments often need to provide site specific infrastructure, such as a Suitable Alternative Natural Greenspace (SANG) ⁶ , or be 'nutrient neutral' ⁷ to mitigate their impact.

⁶ Suitable Alternative Natural Greenspace (SANG) is the name given to greenspace that is of a quality and type suitable to be used as mitigation to offset the impact of new development on certain European sites. In the Dorset Council area SANGs are provided to mitigate against the negative impacts of new development on the Dorset Heathlands.

⁷ Poole Harbour is designated as a Special Protection Area (SPA) and Ramsar site. The Nitrogen Reduction in Poole Harbour Supplementary Planning Document (SPD) requires new development with hydrological catchment covers parts of Purbeck, North Dorset and West Dorset.

3. **Supply Site Issues:** There are a range of supply side issues that affect housing delivery rates in the Dorset Council area. This includes significant environmental constraints and an over-reliance on private housebuilders in respect of housing delivery.

No.	Type of Constraints	Description
A	Land designations	The Dorset Council area is particularly environmentally sensitive when compared to many other parts of the country. As mentioned, the area has a high quality natural and historic environment including respect of its landscape, with large swathes of the plan area being subject to Area of Outstanding Natural Beauty (AONB) designation ⁸ . In addition to the two AONBs there are two heritage coasts and parts of the plan area (parts of the former East Dorset and Purbeck Council areas) are subject to the Green Belt designation. There are also a large number of nature conservation designations, including European sites both within and in close proximity to the plan area. The high quality of the environment makes it challenging to deliver housing especially given the site-specific migration measures that are often required to protect the environment.
B	Reliance on delivery of homes from the private sector	Housing delivery in the Dorset Council area is largely reliant upon private housebuilders. The number of dwellings delivered by the public sector, including the Council itself, is relatively small. The Council does not build housing itself but may work in partnership with a private housebuilder or registered provider to deliver new housing. For example, in the past 5 years, out of around 8,000 new homes delivered, around 1,800 had the involvement of registered providers, leaving around 6,200 number of homes delivered solely by private housebuilders.
C	Granted planning permission not being implemented	The Council's latest monitoring data indicates that there are over 11,060 dwellings in the Dorset Council area that have been granted planning permission but have yet to be developed out, of which around 6,000 dwellings are located in the East Dorset, North Dorset and Purbeck area. The Council will continue to work with the landowners/ developers of these consented schemes to bring them forward as quickly as possible. However, there is a limited amount that the Council can do if a private landowner/ private developer has taken a business decision to 'land bank' a site or develop it out at a slow rate.

⁸ There are two AONBs within the plan area, the Cranborne Chase AONB and the Dorset AONB.

D	Inflation	In 2022/2023, there has been a significant increase in the cost of borrowing and the price of building materials. At the time of writing, England is officially in Recession. This has impacted on developers being able to borrow money to bring forward schemes for development, and if they do, schemes being delayed due to scarcity of building materials. This impacts on overall housing delivery and increases the number of planning permissions that have not been developed out.
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4. **Demand Issues:** Demand for housing in the Dorset Council area is high, driven in part by people especially retirees of people close to retirement age, moving to the area from other parts of the country. This means that affordability is a major issue especially for local first time buyers. The affordability of new dwellings can be exacerbated by slow rates of build and reduced scale of delivery.

3. Key actions and responses

- 3.1.1. The Council has recognised for some time the need to proactively encourage the delivery of new homes across the Dorset Council area. The aim of this being to increase the rate of housing delivery to meet the housing requirements, exceeding the current rate of delivery. The Planning Practice Guidance advocates an approach similar to that being taken by the Councils.
- 3.1.2. The guidance highlights the importance of understanding the barriers to the delivery of homes and consideration of what measures can be put in place to address the issue, are in detailed in Table 3.

Table 3: Key Actions & Responses

1. **Council Teams:** A number of measures have been put in place by the Implementation Team, Development Management and the Housing Enabling Team, as follows:

No.	Type of Measures	Description
A	The Review of the Local Plan	<p>The role of the Planning Policy Team is to produce and revise planning policy for the area including allocating sufficient development sites to meet the housing and economic needs of the area whilst protecting those areas of high environmental sensitivity:</p> <ul style="list-style-type: none"> The Council are currently working towards replacing the predecessor adopted Local Plans, with one adopted Local Plan for Dorset Council. This will be the first Local Plan for the Dorset Area. Consultation has taken place on Issues

		<p>and Options in 2021, which identified a housing supply sufficient to meet and exceed the housing requirement to 2040 by some 30,481 dwellings.</p> <ul style="list-style-type: none"> The Purbeck Local Plan 2018 – amended) requires the delivery of 2,976 residential units throughout the lifetime of that plan (2018-2034), once adopted. <p>Work is ongoing to progress these plans to increase the supply of housing sites to meet the requirement⁹.</p>
B	The Infrastructure & Delivery Team	<p>The purpose of the Infrastructure & Delivery Team is to encourage and enable the delivery of major development and projects to meet the economic and social needs of the area while respecting its environment and character. The Team consists of landscape architects, urban designers and CIL officers. It has close working ties to Development Management: they are consultees on all major planning applications. Members of the team regularly meet with developers at the pre-application stage or earlier to discuss barriers which may be affecting site delivery. The team also works collaboratively with the Local Plans team to produce new policies, in particular those related to site allocations ensuring that the policies reflect the landscape and design parameters necessary to make them acceptable in planning terms. The team are also responsible to for the collection and administration of the Community Infrastructure Levy (CIL) and S106 planning obligations. The team work closely with a number of external organisations including town and parish councils, Natural England, Dorset AONB Team, Environment Agency, Highways England, Historic England and the NHS.</p>
C	The Development Management Major Applications Teams	<p>The Development Management Major Applications Teams manage larger, complex development cases. Often one dedicated officer is assigned to each case from the outset. This means that the applicant has a single point of contact right from the pre-application stage through to decision at both outline and reserved matters stage. In North Dorset, West Dorset Weymouth and Portland and Purbeck the same officer will be responsible for ensuring compliance with conditions. In East Dorset, technicians are used to help discharge conditions which means that planners have more time to devote to major planning applications. Planning applications procedures also have been reviewed to increase the use of pre-application and Planning Performance Agreement (PPA). The Council is striving to make decisions on major and non-major applications within statutory</p>

⁹ Please use the following link to access the current timetable Local Development Scheme for the emerging Dorset Local Plan: [Dorset Council Local Development Scheme - October 2022](#)

		timescales, and as such takes the default position on minors of not seeking or accepting amendments to those applications where applicants or agents have not engaged with the planning service prior to application submission. On major schemes typically one round of amendments will be accepted.
D	Housing Enabling Team	The Housing Enabling Team continues to work closely with Housing Associations and communities in the area to increase the supply of affordable homes. This includes working with a number of Homes England Strategic Partners to increase investment in the area. There is a pipeline of all affordable rural exception sites with around 60 homes at various stages of the development process.

2. **Planning Processes:** The Council recognises the importance of having a well-resourced, efficient and effective planning service in enabling and supporting housing growth.

No.	Type of Measures	Description
A	Work with external bodies	The Council will work with Homes England, and other Government bodies, on housing delivery matters including bringing forward large sites that have stalled. This is likely to include submitting applications for Government funding.

3. **Supporting the Delivery of Housing:** The Council fully understands that it has a key role in housing delivery, including supporting the market to deliver, by making land available for development at a range of locations and scales.

No.	Type of Measures	Description
A	Make full use of Corporate Strategies to delivery housing	As set out its Corporate Plan (Dorset Council’s Plan 2022 – 2024), the Council will maximise the use of Council assets to develop affordable and sustainable housing, including the creation of more social rented housing. The Council is working with Homes England regarding bringing forward proposals on its own land and housing delivery more generally.
B	Deliver its Building Better Lives programme	The programme involves working with developers and health organisations to provide new housing and services, many of which will be affordable homes for local people, key workers employment in the health and social care sector and adults who require various

		degrees of support. The programme has a projected investment from developers of up to £135 million.
C	Finding solutions to bring forward development on-site	<p>Finding solutions by:</p> <ul style="list-style-type: none"> • Working closely with developers to try and resolve any issues that prevent development starting on site. • Working closely with housing associations and registered providers on progressing plans for new housing schemes. The amount of affordable housing being delivered across the Council area is increasing. In 2021/22 494 new affordable homes were built, in 2022/23 644 new affordable homes were built. A Registered Provided development forum has been created to help build on this success. • Supporting community land trusts to deliver new housing. There are around 10 completed community land trust projects in the Dorset Council area, including a large affordable co-housing scheme. The Council is working with a number of groups to bring forward more affordable housing schemes. The Council are submitting a joint funding bid with Dorset Community Action to provide more staffing for housing enabling, this will focus on working with communities to unlock sites. • Exploring potential opportunities to develop a new settlement in the Dorset Council area to help meet the longer-term growth needs of the area.

4. Working with Government: The Council recognises that it cannot act alone to improve housing delivery in the area and that a good relationship with Government, and other stakeholders, will be needed to help improve housing delivery locally.

No.	Type of Measures	Description
A	Work with external bodies	The Council will work with Homes England, and other Government bodies, on housing delivery matters including bringing forward large sites that have stalled. This is likely to include submitting applications for Government funding ¹⁰ .

¹⁰ Following a bid to the Brownfield Land Release Fund the Council has recently been awarded £2.13 million grant funding by the Government. The funding will be used to enable work to progress to help build almost 200 homes on key brownfield sites across the Dorset Council area.

B	Monitor and bid for infrastructure as and when opportunities arise	The Council has previously been successful in receiving funding from the Government’s Housing Infrastructure Fund (HIF). The Council has also secured £2.13m of funding through the Brownfield Land Release Fund. This funding will be used to enable work to progress to help build almost 200 homes on brownfield sites across the Dorset Council area. More recently, £19.5m of Levelling Up Funding was secured to support waterside regeneration in Weymouth. In addition, the Council has recently received £4.63m from the Local nutrient Mitigation Fund to deliver nutrient mitigation within the Poole Harbour catchment.
C	Continue to work with and support Government’s changes to LURA to find a solution to nutrient neutrality	The Levelling Up and Regeneration Act (LURA) received Royal Assent in October 2023, however there is still some uncertainty within the Poole Harbour catchment about the need for phosphorous neutrality and there are no strategic mechanisms in place to deliver phosphorous migration in the short term. At the time of writing, the Council are still waiting on further detail or guidance to be issued by the Government on this matter. Dorset Council has an existing mechanism in place for delivery nitrogen mitigation within the Poole Harbour Catchment. Within the remaining catchments that affect the Plan area, there remains a need to demonstrate phosphorous neutrality and Dorset Council is working with partners to identify and deliver opportunities for delivering mitigation.

5. **Other measures:** Making a meaningful impact on housing delivery – providing much needed homes locally – is a long term undertaking which will gather pace as the programme progresses. Some of the actions include:

No.	Type of Measures	Description
A	Planning Policy	<ul style="list-style-type: none"> • To continue working with the Government and Natural England to find solutions to deliver residential housing on sites that are located in catchments affected by the nutrient neutrality requirement. • To continue progressing with the Dorset Council Local Plan so that more sites can be allocated for residential development to contribute towards meeting housing delivery targets and to supersede the technically out-of-date Local Plans. • To continue working with key stakeholders when developing the policies and evidence for the Local Plan, particularly when planning for new infrastructure to support new growth.

		<ul style="list-style-type: none"> • To continue progressing with the emerging Purbeck Local Plan to adoption. • Working more closely with major developers to persuade them to follow schemes in Dorset, demonstrating that there is a significant demand for homes. • Helping stalled scheme progress including through applications for government funding. • Promoting and supporting those who wish to build their own home. • Talking to homeowners and agents about potential sites.
B	Development Management	<ul style="list-style-type: none"> • To continue to encourage all applicants to undertake pre-app discussions with the local authority before full planning permission is submitted, as this helps to reduce potential issues with proposals. • To continue to aim to meet statutory deadlines with all submitted planning applications.
C	Infrastructure Team	<ul style="list-style-type: none"> • Helping stalled scheme progress - including through applications for government funding when issue(s) of delivering infrastructure on specific sites arise.
D	Housing Enabling	<ul style="list-style-type: none"> • Considering joint ventures with developers or partners. • Considering the use of Council assets or purchase land for development. • Working with housing associations and providers on new schemes. • Supporting Community Land Trusts.
E	Building Control	<ul style="list-style-type: none"> • Officers are working towards gaining the recently introduced accreditation to ensure development is not slowed by an inability to sign-off on the various stages of building regulations.

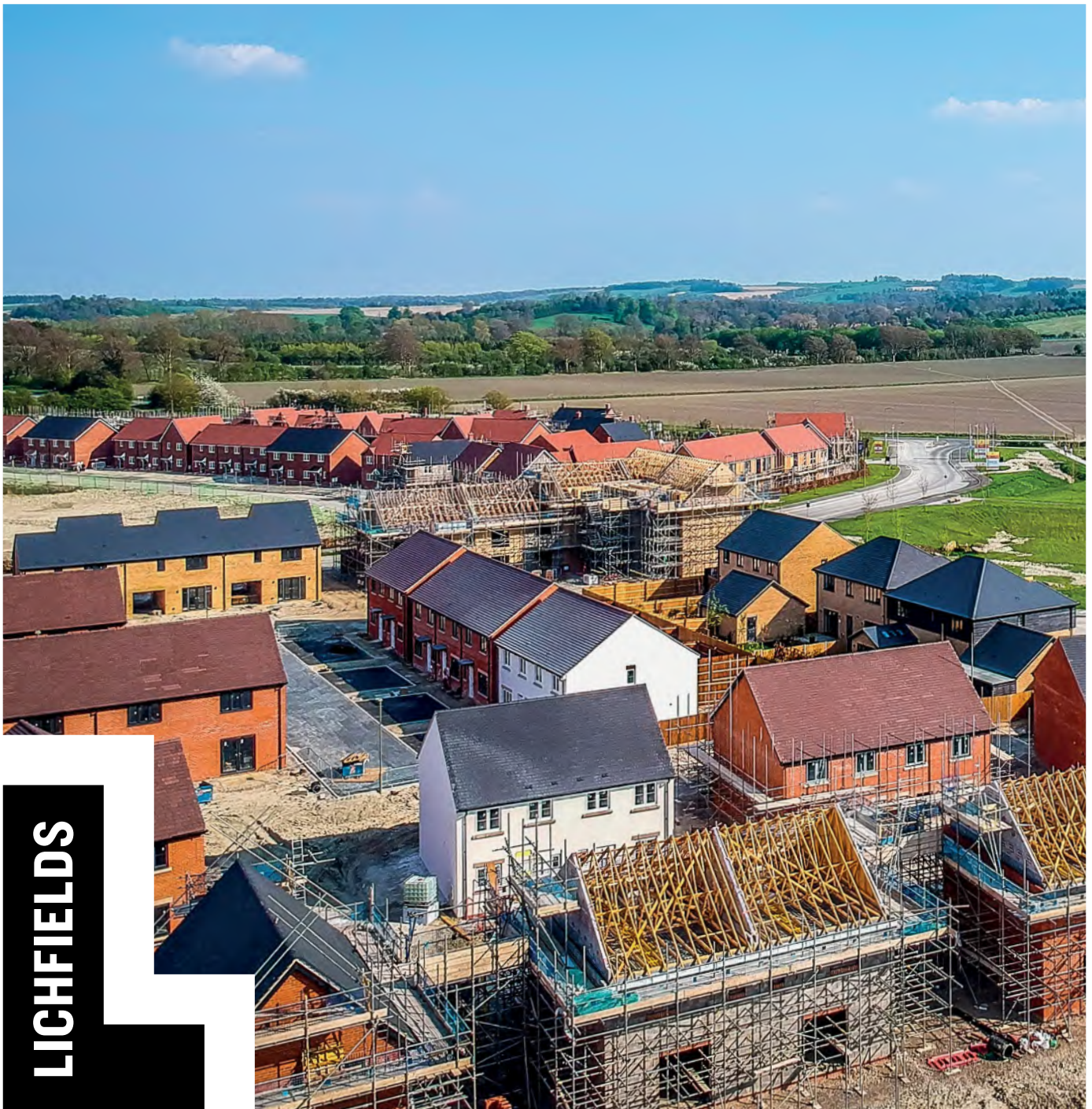
4. Monitoring and performance

- 4.1.1. The success of this Action Plan will ultimately be assessed in terms of impacts that occur in respect of housing delivery.
- 4.1.2. Throughout the year the 'Key Actions & Responses' will be considered by the Council's Portfolio Holder for Planning and senior officers within the Council including the Head of Planning. The Portfolio Holder for Planning and senior officers will consider actions to address underperformance.
- 4.1.3. A full review of the Action Plan will occur annually to consider additional actions or necessary amendments.

Start to Finish

How quickly do large-scale housing sites deliver?

THIRD EDITION



LICHFIELDS

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Executive summary

This is the third edition of Start to Finish. The purpose of this research remains to help inform the planning system and policy makers in considering the approach to planning for new homes. The empirical evidence we produced in the first two versions has informed numerous local plan examinations, S.78 inquiries and five-year land supply statements.

Things have moved on notably since the second edition in 2020. Plan making and decision taking have slowed, the housing market no longer benefits from Help to Buy or cheap mortgage rates and the perennial concern about perceived land banking has been comprehensively rebutted by the Competition and Markets Authority (CMA). As we approach a general election, and with no end to the housing crisis, the boosting of housing delivery to achieve 300,000 homes per annum through a new generation of Local Plans (prepared under the Levelling Up and Regeneration Act) faces renewed focus. It is therefore timely to refresh the evidence on the delivery of large-scale housing sites, which – with our enlarged sample – now considers real-world implementation across 179 sites of over 500 dwellings.

We draw six key conclusions:

1. **Only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years.** By comparison, sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling.

2. **Mean annual build-out rates on large sites have dipped slightly for all site sizes compared to previous editions of this research but are broadly comparable.** The slight dip may capture characteristics of newly-surveyed sites, but also extra monitoring years since 2019 that reflect market changes.
3. **Tough market conditions mean a likely slowing in build-out rates and house building overall.** The impact of the Help to Buy programme ending and increased mortgage rates is not yet showing in completions data, but the effect on transactions has already been significant and the OBR forecast they will fall further in 2024/25.
4. **Demand is a key driver of build-out rates.** The absorption rate of the local housing market dictates the number of homes a builder will sell at a price consistent with the price they paid for the land. Areas with a higher demand for housing (measured by higher affordability ratios, of house prices to earnings) had higher average annual build-out rates than lower demand areas.
5. **Variety (of housing type and tenure) is the spice of life.** Schemes with 30% or more affordable housing had faster average annual build-out rates than schemes with a lower percentage, but schemes with no affordable housing at all delivered at a faster pace than schemes with 10 - 29% affordable units. Having additional outlets on site also has a positive impact on build-out rates.
6. **Large-scale entirely apartment schemes can achieve significant annual build-out rates, but delivery is not always consistent, with 'lumpy' delivery of blocks of apartments and a higher susceptibility to market downturns and other development constraints.** These schemes can also have protracted planning to delivery periods compared to conventional housing schemes of the same size.



Key figures

297

sites assessed, with a combined yield of 387k+ dwellings; 179 of the sites delivering 500+ dwellings

9

solely apartment schemes in urban areas assessed, with a combined yield of 5,300+ units

6.7

median years from validation of the first planning application to the first dwelling being completed on schemes of 2,000 or more dwellings

100-188 dpa

average annual build-out rate range for schemes of 2,000+ dwellings¹

44-83 dpa

average annual build-out rate range for scheme of 500-999 dwellings²

34%

quicker³ to deliver greenfield sites of 500 or more units than their brownfield counterparts

69 dpa

average completion per outlet on sites with one outlet, dropping to 62 dpa for two outlets, and 55 dpa for three outlets

3x longer

planning to delivery periods for brownfield apartment schemes of 500-999 units compared to their conventional housing counterparts

¹ Range is from the lower quartile to upper quartile figures

² As above

³ This is based on the median metric

O1 Introduction

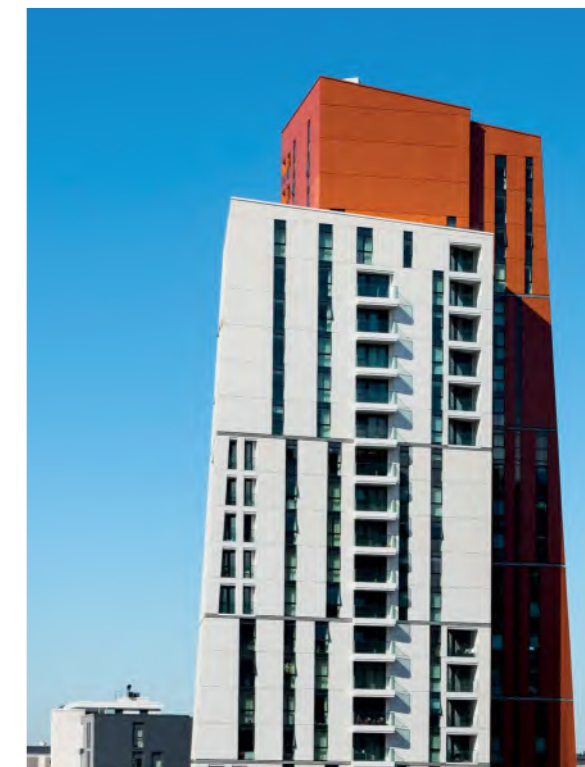
This is the third edition of Lichfields' award winning⁴ research on the build out of large-scale residential development sites.

First published in 2016 and then updated in 2020, the report is established as an authoritative evidence base for considering housing delivery in the context of planning decisions, local plans and public policy debates.

In this update, we have expanded the sample size (with an extra 82 large sites delivering 500 or more dwellings, taking our total to 179 large sites, equivalent to over 365,000 dwellings). Small sites data has also been updated with 118 examples totalling over 22,000 dwellings in this third edition. We have used the latest monitoring data⁵ where available, up to 1st April 2023.

The context for considering the delivery of development sites has evolved since our last edition and this has shaped the focus of our analysis.

In 2020 a recently re-elected Conservative government was gearing up for radical planning reform⁶ including proposals aimed at boosting rates of on-site delivery following Sir Oliver Letwin's independent review of build out⁷. As of 2024, the business models of housebuilders and land promoters - and allegations of perceived 'land banking' - have received fresh examination by the Competition and Markets Authority (CMA) which published its Market Study in February 2024⁸. The CMA found that land banking is a symptom of the planning system rather than a cause of under delivery of housing. We have cross referenced our latest findings with the CMA's work.



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⁴ The first edition was the winner of the 2017 RTP1 Planning Consultancy Research Award

⁵ Some sites have not been updated due to lack of publicly available data. The appendices make clear to which sites this relates

⁶ Leading in due course to the August 2020 Planning White Paper: Planning for the Future

⁷ Published October 2018

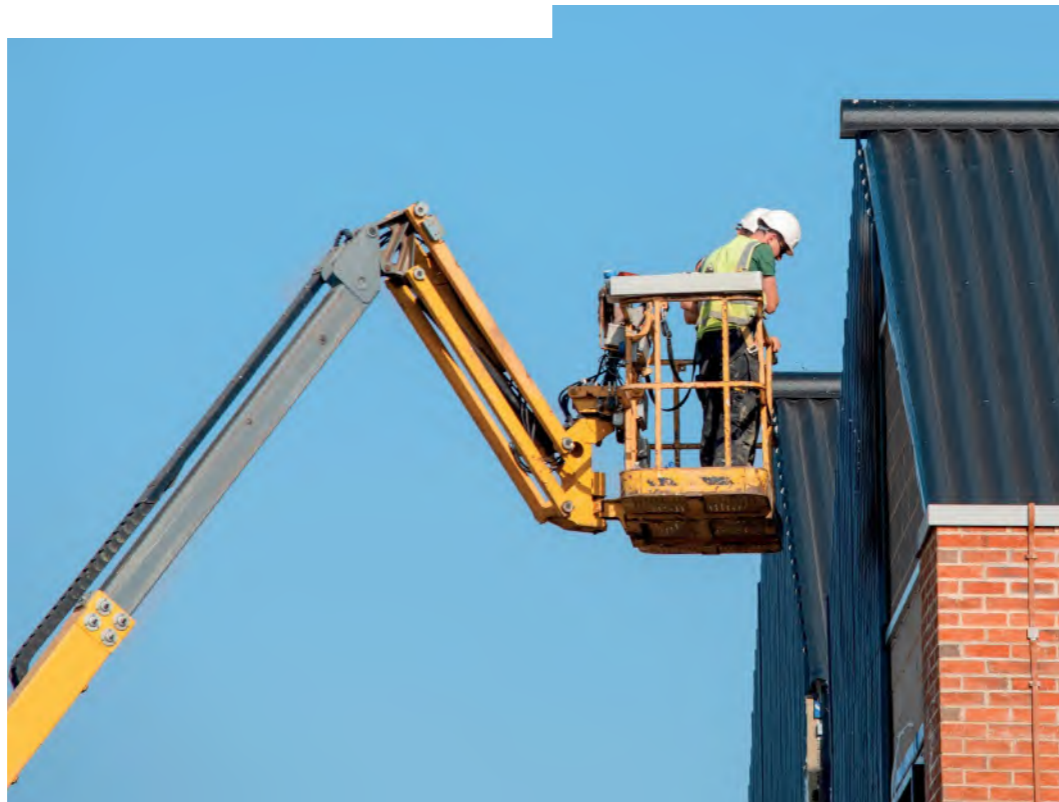
⁸ https://assets.publishing.service.gov.uk/media/65d8baed6efa83001ddcc5cd/Housebuilding_market_study_final_report.pdf

The Levelling Up and Regeneration Act ('LURA')⁹ introduced new measures aimed at build-out via the use of Commencement Notices (s111), Progress Reports (s114) and Completion Notices (s112). Regulations to determine the practicalities of these measures are awaited¹⁰ but their design and application will benefit from a sound evidence-based grasp of how strategic housing schemes are implemented.

Our research continues to focus exclusively on what has happened on the ground, how long things took and what has been built. We do not include forecasts of future delivery. Our aim is to provide real-world benchmarks to inform consideration of housing delivery trajectories. This can be particularly relevant in locations with few contemporary examples of strategic-scale development. It also provides some context for when Government considers the recommendations of the CMA.

The research excludes London because of the distinctive characteristics of housing development in the capital. However, our sample does include apartment schemes on brownfield land in regional urban centres. Recent policy shifts – increasing the focus on boosting housing supply on previously-developed sites¹¹ – mean it will become more important to understand the distinctive delivery profile of such schemes.

Finally, the housing market has taken a turn. In 2020, net housing additions in England peaked at 248,500. But in 2024, the market has stuttered with downward pressures on values and sales rates: Help to Buy closed in March 2023, mortgage rates more than doubled in 2022 and remain high and Registered Providers face challenges that limit their ability to invest in new stock. Our report considers how these headwinds may affect annual build-out rates.



⁹ <https://www.legislation.gov.uk/ukpga/2023/55/enacted>
¹⁰ The provisions require secondary legislation which, at the time of writing, has not been published and for which there is no timetable. There is also no guarantee the provisions will ever come into force. Albeit the provisions for making these regulations will come in to force on 31st March and the intentions were set out at the time the Bill was published in the supporting Further Information paper.
¹¹ Including the December 2023 changes to the NPPF, which clarify that the 35% uplift to the Standard Method in the 20 largest urban centres is expected to be delivered in those areas rather than in surrounding areas. In February 2024, the Secretary of State published the review into the London Plan and issued a consultation on 'Strengthening planning policy for brownfield development': <https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development>

02 Methodology

This report focuses analysis on the pace at which large-scale housing sites of 500 dwellings or more emerge through the planning system and how quickly they are built out. It identifies the factors which lead to faster or slower rates of delivery, including those impacting specifically on apartment schemes on brownfield sites in urban areas.

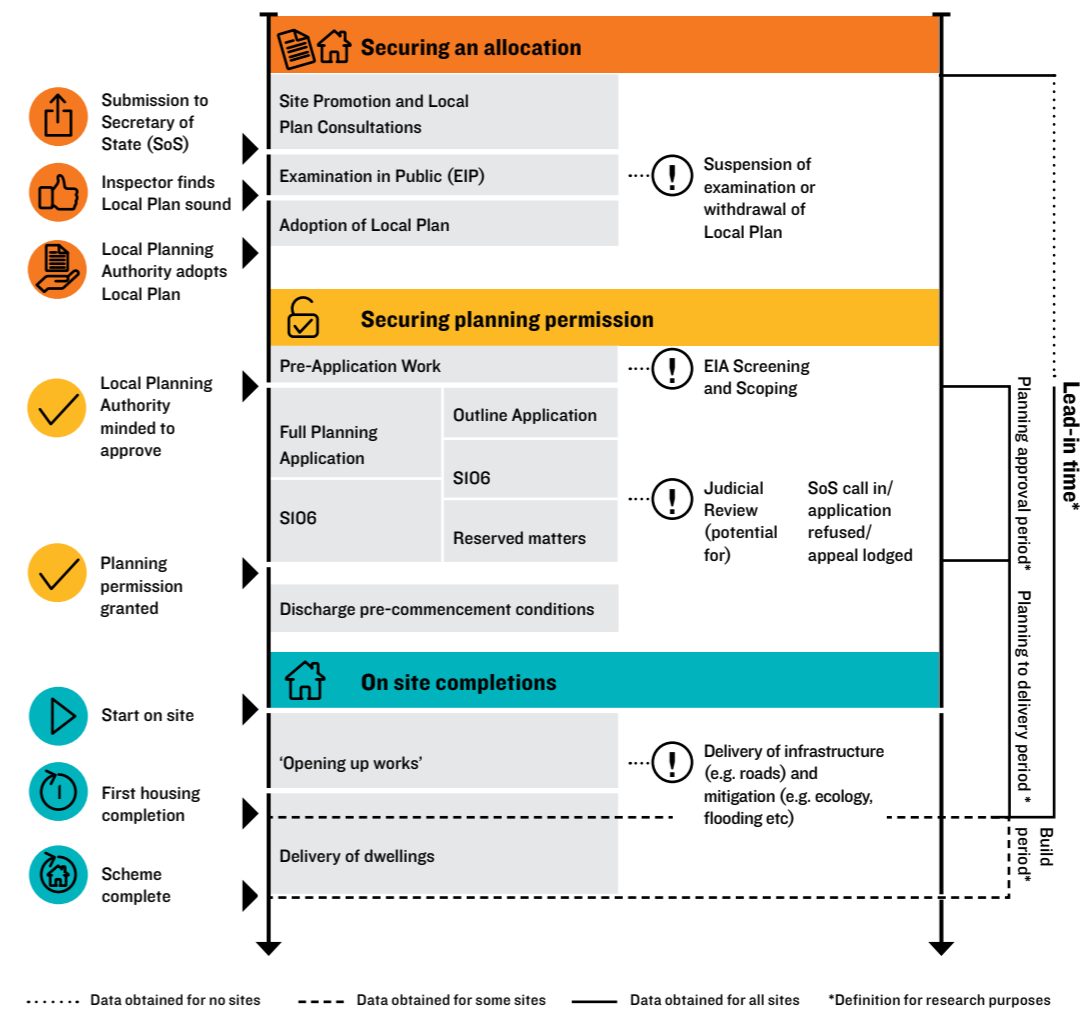
Definitions

For all sites, 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 development stages have been codified as illustrated in Figure 2.1, which remain unchanged from the previous editions of this research.

The overall 'lead-in time' covers stages associated with securing a local plan allocation, going through the 'planning approval period' and 'planning to delivery period', and ending when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time.

Figure 2.1: Timeline for the delivery of large-scale housing sites



Source: Lichfields analysis

Lead-in time

Securing a development plan allocation is an important stage in the delivery of most large-scale housing sites. However, it is not possible to obtain information on a consistent basis for this process – which can often take decades across multiple plan cycles – and so we have not incorporated it in our analysis. For the purposes of this research the lead-in time reflects only the time from the start of the planning approval period up to the first housing completion.

Planning approval period

The 'planning approval period' begins with the validation date of the first planning application on the site (usually an outline application but sometimes hybrid or full) and extends until the date of the first detailed approval for dwellings on the site (either full, hybrid or reserved matters applications). It is worth noting that applications are typically preceded by significant amounts of (so-called) 'pre-app' engagement and evidence work, but due to a lack of data on these matters, it is not possible to establish a reliable estimate of the time taken on these activities (including through the local plan and pre-application). But the time taken to achieve an implementable planning permission will be markedly longer than we have identified in this study because work inevitably begins prior to the date the planning application is validated.



Planning to delivery period

The 'planning to delivery period' follows the planning approval period and measures the time from the date of the first detailed permission for construction of homes (usually reserved matters but could be a hybrid or full application) to the completion of the first dwelling. The use of the 'completion of the first dwelling' rather than 'works on site' reflects the availability of data: housing completions are routinely publicly recorded by LPAs but the commencement of work on site tends not to be. This allows for a consistent basis for measurement.

We can mostly only identify the monitoring year in which the completion took place, so the mid-point of the monitoring year has been used to calculate the end date of the planning to delivery period. For example, a scheme delivering its first unit in 2014/15 would be recorded as delivering its first unit on 1 October 2014.

For solely apartment schemes this will be slightly different as developers will typically complete an entire block on a single day. This will often mean the 'planning to delivery period' is longer as the first recorded completion for multiple apartments in a newly constructed multi-storey block would require more on-site work than required to complete a single house.

Build period

The annualised build-out rates are recorded for the development up to the latest year where data was available as of April 2023 (2022/23 in most cases). Not every site assessed will have completed its build period as many of the sites we considered had not delivered all dwellings permitted at the time of assessment; some have not delivered any dwellings.

We anticipate multi-phased apartment schemes will have more 'lumpy' completions data as entire blocks are recorded as having been completed on the same day. This could mean years with high delivery preceded and/or followed by more fallow years.

Detailed definitions of each of these stages can be found in Appendix 1.



Development and data

Our analysis focuses on larger sites of 500 or more dwellings, but we have also considered data from smaller sites ranging from 50-499 dwellings for comparison and to identify trends. The geographic distribution of sites assessed is shown in Figure 2.2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

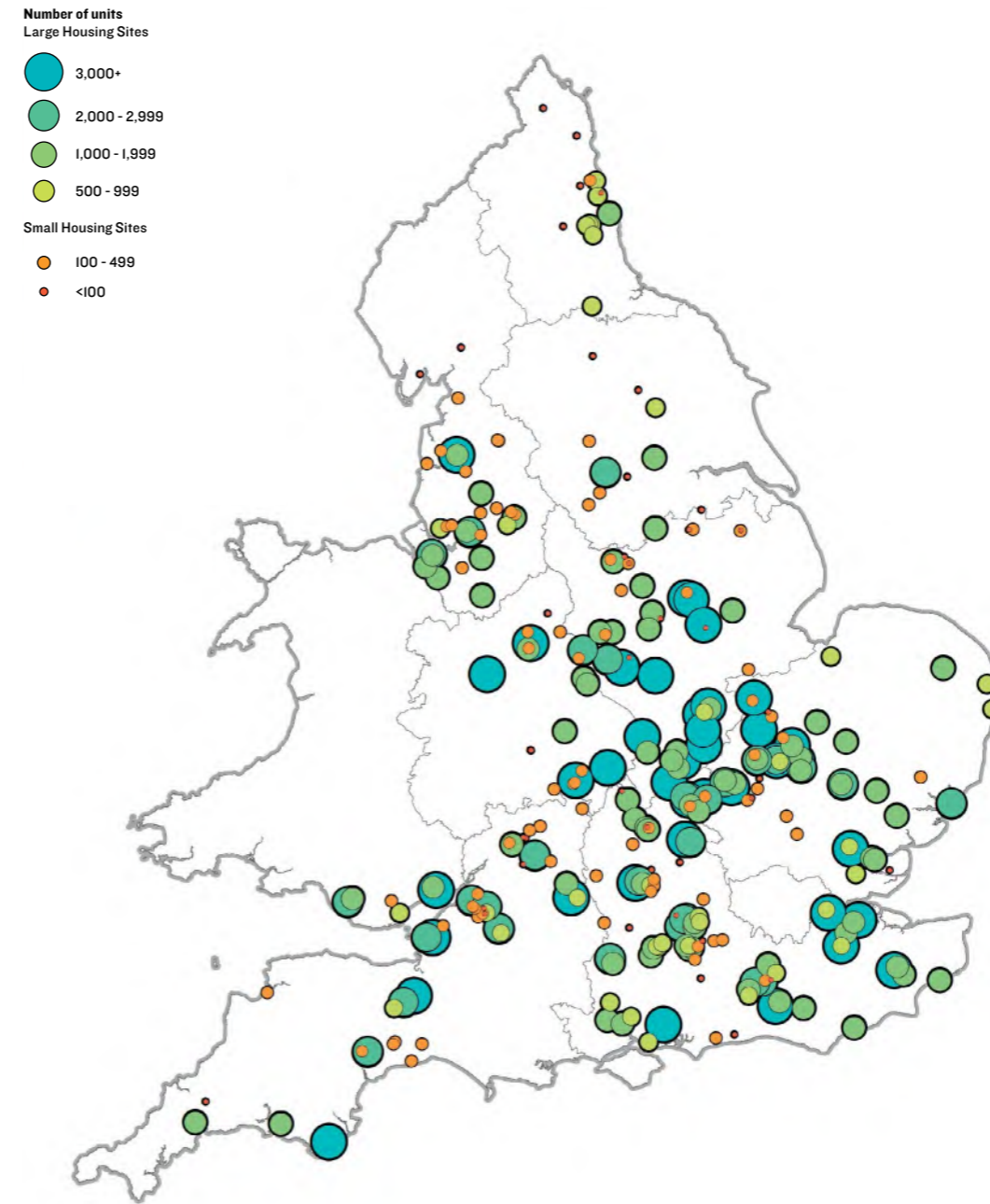
Efforts were made to cover a range of locations and site sizes in the sample, but we cannot say it is representative of the housing market throughout England and Wales. Our conclusions may not be applicable in all areas or on all sites. Our sample size has increased significantly: we now have 179 large sites (the second edition had 97) and 118 small sites (the second edition had 83). We have endeavoured to include more recent examples to ensure that the latest trends in planning determination and build-out rates for housing sites are picked up proportionally through the analysis of housing sites of all sizes.



The sources on which we have relied to secure delivery data on all sites in this research include:

1. Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by LPAs¹²;
2. Contacting the relevant LPA, and in some instances the relevant County Council, to validate or update the data; and
3. In a handful of instances obtaining/confirming the information from the relevant house builders.

Figure 2.2: Map of sites assessed, by size of site (dwellings)



Source: Lichfields analysis

¹² Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

03 How long does it take to get started?

In this section we look at lead-in times; the time it takes for large housing sites to get planning permission and begin to deliver homes on site. This includes both the 'planning approval period' and the 'planning to delivery period'.

Planning approval period

The first stage is the planning approval period: the time taken from the validation of the first application to the first detailed permission. For large sites, this period typically comprises the determination of an outline application, and then a reserved matters application (but in some cases, it may refer to a single full/hybrid application). Our data shows that the average median planning approval period generally increases in accordance with site size; for small sites of less than 100 dwellings, this is on average 1.5 years, but for sites of 1,000 dwellings or more, it takes an average of five years to obtain detailed planning permission, with minimal change in this period as site size increases above this point.

Although it takes longer to achieve a detailed planning permission on larger sites, there is not a linear relationship between size of site and time taken to secure the detailed permission. This might be because the largest sites are more likely to be allocated in adopted local plans and so the principle of development would have already been established by the time an application is submitted. In theory this would help to speed up the planning approval process but end-to-end timescales are dependent on a timely local plan system.

Table 3.1 Lower quartile, median and upper quartile planning approval period (years) by site size

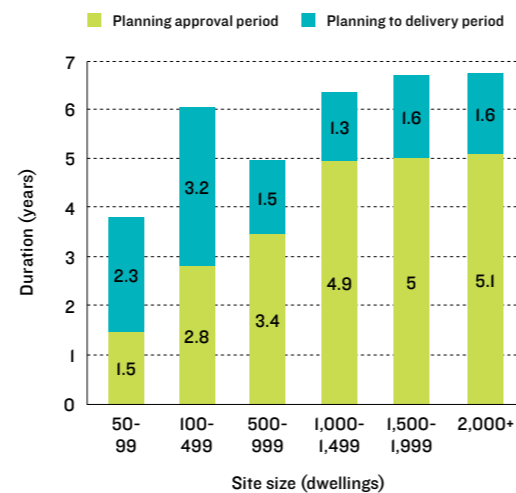
	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.1
Median	1.5	2.8	3.4	4.9	5.0	5.1
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

In Wales, the restrictive policy towards speculative applications makes an allocation almost essential.

The CMA has also undertaken analysis into the length of time it takes land promoters and house builders to obtain outline planning permission. Using data obtained from land promoters, the CMA found that of the outline permissions obtained in 2022, 43.4% of them were obtained within five years or less, with 97.4% in nine years or less. These periods are significantly longer than the figures in our analysis because this includes pre-application promotion work, which is not captured in our data which starts with submission of the first application.

Figure 3.1 Median average timeframes from validation of the first application to completion of the first dwelling



Source: Lichfields analysis

The CMA go on to say in footnote 111 that "in estimating the development timeline, our estimate for the most comparable element of the process is, on average, 3 to 4.5 years". This is more closely aligned to our findings on securing planning permission on a large site.

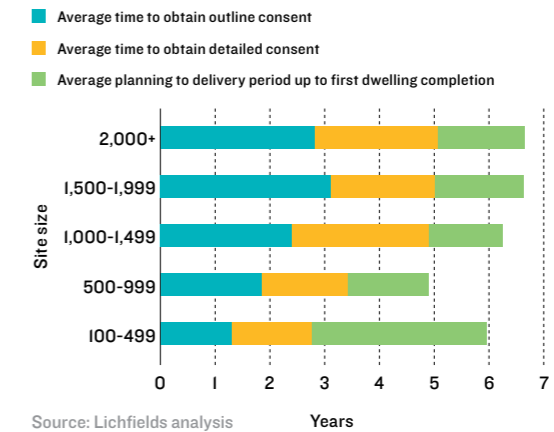
The CMA also found that the time required to make planning decisions is increasing (paragraph 4.27). However, its analysis considered developments of all sizes; we found no discernible difference in the time it takes schemes of 500 dwellings to achieve detailed approval since 2012/13 compared to older schemes. This could be because large-scale housing applications have always been more complex and so inevitably took longer to determine. They would, likely, also only be pursued by those with significant experience in this sphere. However, we did find an increase in the planning to delivery period which we discuss later in the report.

Outline permission to completion of the first dwelling

Our 2020 research was published in the aftermath of the NPPF¹³ which raised the bar on the definition of 'deliverable' for determining whether a site could be assumed to supply completions within the five-year housing land supply period. This definition is now well-established with the 'clear evidence' required to demonstrate deliverability of sites that do not benefit from a detailed permission.

We have updated our findings on the average time taken from gaining outline permission to the completion of the first dwelling on site, as shown in Figure 3.2. This indicates that it takes on average around 3 - 4.6 years from the grant of outline planning permission to deliver the first dwelling. This means at the time of its granting, an outline permission will on average deliver limited amounts of housing within the next five-year period.

Figure 3.2 Overall lead-in times for sites of 100 dwellings or more including time taken for outline consent by site size



Source: Lichfields analysis

Planning approval period: What is going on?

Larger sites are often complex and require outline permissions to set the framework for future phases or staged delivery before bringing forward a detailed scheme through reserved matters and detailed permissions.

Outline planning permissions for strategic development are often not obtained by the company that builds the houses. Master developers and land promoters play a significant role in bringing forward large-scale sites that are subsequently implemented by house builders.

Promoters will typically obtain outline planning permission and then sell the site to a house builder that will secure the detailed approvals.

The CMA explains that land promoters are contractually obligated to begin the sale of land as soon as practically possible after receiving outline planning permission. The CMA found that whilst in 2022 65% of sites sold by promoters were sold within 12 months of obtaining planning permission, their data implied a large variation in the time taken to sell a site¹⁴. Reasons included low interest in the site, protracted price negotiations, withdrawal from a sale, and multi-phased sales.

¹³ February 2019

¹⁴ CMA Housebuilding Market Report paragraphs 4.53 and 4.66-4.69

1.6 years

time taken to build the first dwelling following detailed consent on a 1,500+ dwelling scheme

Planning to delivery period

Figure 3.1 demonstrates that smaller sites in this research take longer to deliver their first dwelling than large sites, measuring the time from detailed approval being secured. Sites of 500+ dwellings take 1.3 - 1.6 years to deliver the first dwelling. By contrast sites for 50 - 99 dwellings take 2.3 years, whilst sites of 100 - 499 dwellings takes 3.2 years.

Planning to delivery period: What is going on?

There are typically complex site-specific issues such as securing statutory approvals, signing-off details, resolving land ownership and legal hurdles prior to the commencement of development.

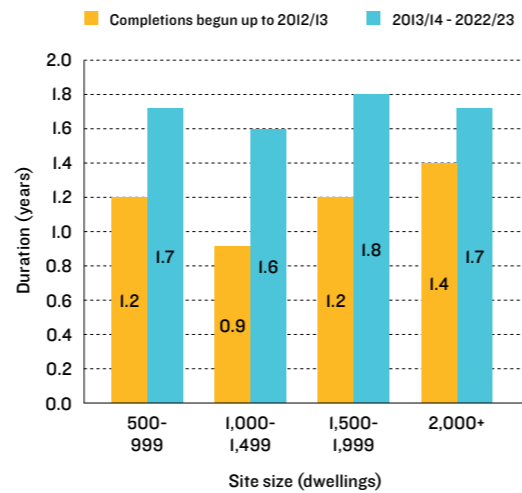
House builders must discharge pre-commencement planning conditions before constructing a home. These should be tailored to tackle specific problems but can be used broadly, for example relating to drainage, soil surveys, ecology, environmental health, materials samples, highways/ traffic plans and formalise any CIL liability.

Our 2021 research¹⁵ provided a deep dive into five local authority case studies, using their monitoring data to look at what is happening to individual planning permissions at the local level once granted. Some permissions require re-working or replanning to improve a scheme. Often these reworks – undertaken at a point at which the principle of development has already been established – will help ensure the most efficient use of land and the right scheme for the market, while also reducing planning risk for the developer. Detailed permissions are more likely to be reworked, likely reflecting their relative inflexibility compared to outline permissions. The extent of re-plans reflects the limited scope to quickly amend permitted schemes without needing to submit a new application.

Planning to delivery period over time

The planning-to-delivery period is longer for sites of all sizes in the part of our sample that started in the last decade. Figure 3.3 splits the planning to delivery analysis in Figure 3.1 by time. It shows that up until 2012/13 (just after the NPPF was first introduced), the planning to delivery period ranged between 0.9 – 1.4 years, with schemes of 2,000+ dwellings taking the longest to get started. In the period since the NPPF, the planning to delivery period has extended up to 1.6 - 1.8 years, a figure that is relatively consistent across all site sizes. The reasons for the change are not identified in the data, but may reflect the increased complexity of planning requirements as well as resourcing pressures in LPAs.

Figure 3.3 Planning to delivery period by site size



Source: Lichfields analysis

The overall lead-in time

The average time from validation of an outline application to the delivery of the first dwelling for large sites of 500 dwellings or more ranges from 4.9 to 6.7 years depending on site size, i.e. beyond an immediate five-year period for land supply calculations.

When combining the planning approval period and planning to delivery period only sites comprising 99 dwellings or less will – on average – deliver anything within an immediate five-year period. Interestingly, sites of 100 - 499 dwellings and all sites of 1,000 dwellings or more have a very similar combined planning approval and planning to delivery period of 6 - 7 years, despite significant variation in 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).



¹⁵ Lichfields, 2021 Tracking Progress

04 How quickly do sites build out?

The rate at which homes are to be built on sites – and the realism of housing land supply and trajectories – is often contested at local plan examinations and planning inquiries. Whilst the pressure on LPAs to maintain a five (or four¹⁶) year housing land supply may be decreasing¹⁷, the LURA contains measures that will increase scrutiny of build-out rates at the planning application stage, with the potential (at least in theory) for Completion Notices that nullify permissions when sites fall behind from their agreed delivery pace. A good understanding of real-world examples and evidence on absorption rates (see Section 5) remains essential.

Our analysis of build rate averages excludes any sites which have less than three years of completions data. This is because it is unlikely the completion figure in year one would cover a whole monitoring year, and so could distort the average for that site when considered alongside only one full year of completion data.

Some schemes do achieve very high rates of build-out in particular years (the top five annual figures were 520-620 dwellings per annum [dpa]) but this rate of delivery is not sustained (see Table 4.1). Apart from Ebbsfleet¹⁸, the peak build-out rates were anomalous. That said, the five examples in Table 4.1 remain at the upper end of (or above) the range of our overall sample: for schemes of 2,000 or more dwellings the average annual completion rate throughout build-out ranges from 100 to 188 dpa (see Figure 4.1).

Table 4.1 Peak annual build-out rates compared against average annual build-out rates on these sites

Site	Local Planning Authority	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne (original new settlement ¹⁹)	South Cambridgeshire	3,300	620	188
Ebbsfleet	Dartford	15,000	619	255
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	562	251
Great Kneighton (Clay Farm)	Cambridge	2,188	539	219
Oakley Vale	North Northamptonshire	3,100	520	162

Source: Lichfields analysis

¹⁶ See NPPF paragraph 226

¹⁷ See NPPF paragraph 76

¹⁸ Ebbsfleet has delivered a series of high annual build-out rates in the most recent five-year period: 2018/19 = 613, 2019/20 = 553, 2020/21 = 347, 2021/22 = 533 and 2022/23 = 619

¹⁹ The second edition of this research included Cambourne as an example with a total site size of 4,343 dwellings. However, in this iteration we have separated out the sites into Cambourne the original new settlement (3,300 dwellings), Upper Cambourne (950 dwellings) and Cambourne West (2,350 dwellings)

100-188 dpa
average annual build-out rate on 2,000+ dwelling scheme

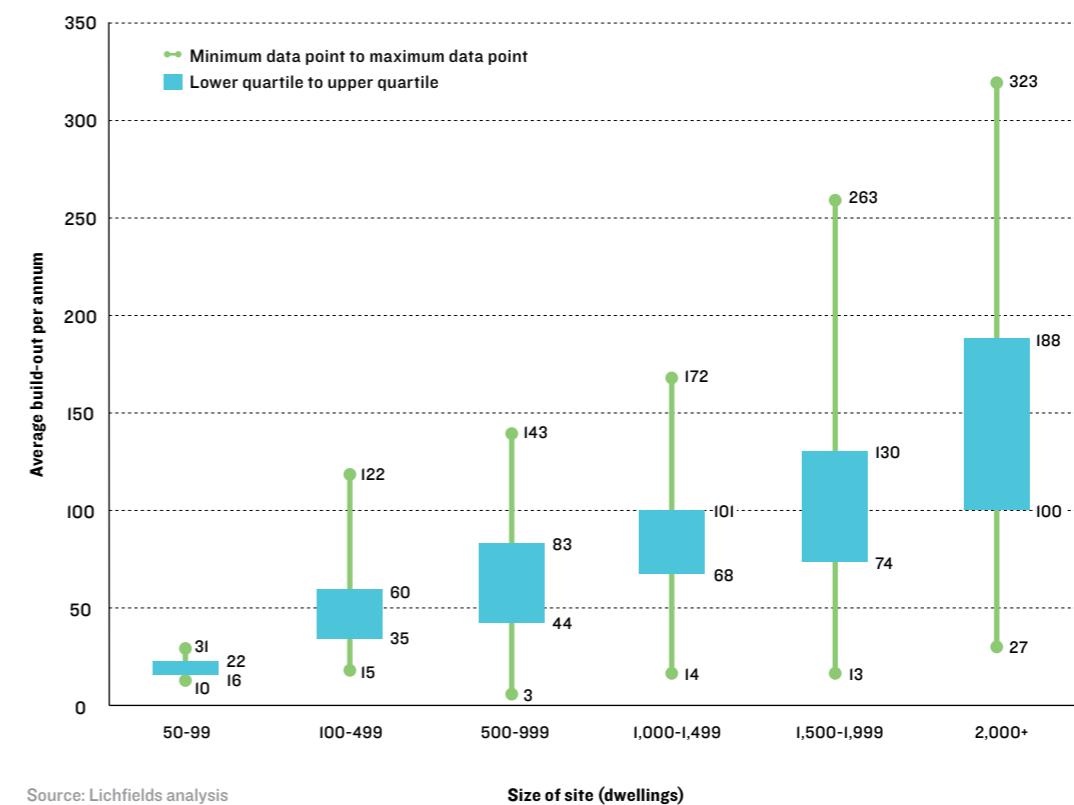
Average annual build-out rates

Figure 4.1 presents our updated results for average annual build-out rates by site size for all sites in our sample. Unsurprisingly, larger sites deliver on average more per year than smaller sites. Those of 2,000 dwellings or more, delivered on average more than twice the rate of sites of 500 - 999 dwellings.

In this third iteration of the research, we have identified the average (mean and median) build rate, but also the lower and upper quartiles to illustrate a range.

This avoids too much focus on a singular figure, recognising the wide range of factors that influence build-out rates as set out in Section 5. For sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. The highest average build-out rate in our analysis is 323 dpa, at Great Western Park, in the Vale of White Horse.

Figure 4.1: Average build-out rate by size of site (dwellings)



Source: Lichfields analysis

Comparison with our previous editions

The number of sites we have assessed is significantly increased in this edition of the research, but particularly for the largest sites (2,000+ dwellings) where we have 43 extra examples. Over the three editions of our research, the mean build-out rate has decreased marginally, whilst the median rate is also lower for sites under 999 dwellings but broadly static for sites of 1,000 dwellings or more. Overall, there is limited difference in the average build-out rates across all three editions which gives us confidence in the findings. However, it does show there a reduction in the presented build-out rates overall. We explore whether this is a function of our sample size or the addition of new years of monitoring data in Section 5.

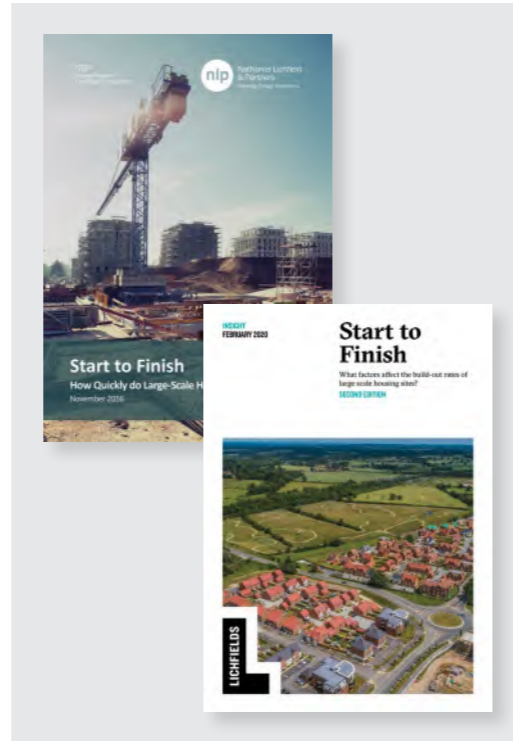


Table 4.2 Average build-out rates by size of site (dwellings) compared with the first and second editions of the research

Site Size (dwellings)	Mean build-out rate (dpa)				Median build-out rate (dpa)		
	First Edition	Second Edition	Third Edition		Second Edition	Third Edition	
50-99	27	22	20		27	18	
100-499	60	55	49		54	44	
500-999	70	68	67		73	68	
1,000-1,499	117	107	90		88	87	
1,500-1,999	129	120	110		104	104	
2,000+	161	160	150		137	138	

Source: Lichfields analysis

05 What factors can influence build-out rates?

In this section we explore some of the factors that can influence the pace at which sites are built out. This includes site and location-specific factors, such as the strength of local market, the amount of affordable housing and whether a site is greenfield or brownfield. In this third edition, we also consider the potential impact of economic and housing market cycles.

Economy and market impacts

The housing market appears to be at the start of a new economic cycle. After around a decade of generally favourable market conditions (with cheap finance and policy support) potential home purchasers and builders are facing different circumstances.

Figure 5.1 looks at how average build-out rates on our sampled sites have correlated with net additional dwellings in England and recent economic events and interventions over our study period.

Economic and policy context for house building and build-out rates

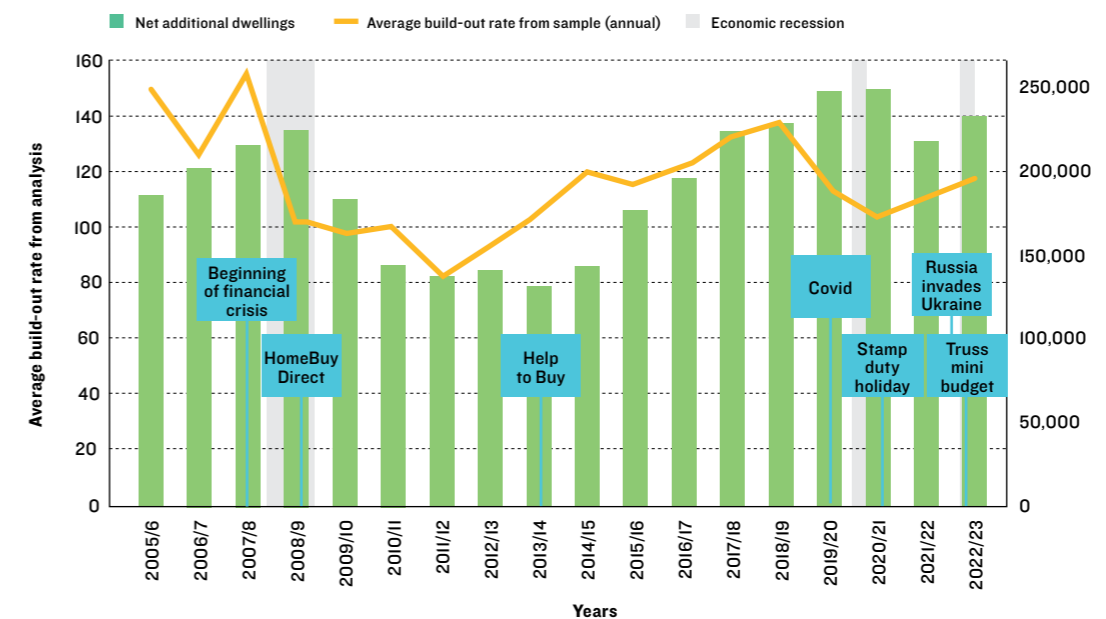
Government support for new home buyers was available before the Global Financial Crisis (GFC), (i.e. "First Buy" in 2006/7) but more robust support was introduced subsequently, firstly with Homebuy Direct, then Help to Buy which was introduced in 2013 and lasted until October 2022. It supported almost a third of new home sales over this period²⁰. COVID-19 prompted a further stimulus in the form of a stamp duty holiday (July 2020 - July 2021).

Alongside these policy measures, mortgage rates were historically and consistently low, falling to 0.5% in March 2009 and 0.1% in March 2020 before rising again from December 2021.

Combined, this provided favourable conditions for home buyers and house builders.

The end of Help to Buy in 2022 was compounded by dramatically increased mortgage rates, reaching 5.25% in August 2023. The effect to transactions has already been significant and the OBR forecast (in March 2024) that transactions in 2024 will be 14% below pre-pandemic levels (2017-2019) and will not return to this level until 2027.

Figure 5.1: Net Additional Dwellings (England) and build-out rates (England and Wales) in economic context



Sources: Lichfields analysis of build-out rates, DLUHC 2024, Increase in Dwelling stock Table I04

²⁰ <https://www.gov.uk/government/statistics/help-to-buy-equity-loan-scheme-data-to-30-september-2021/help-to-buy-equity-loan-scheme-data-to-30-september-2021#about-the-help-to-buy-equity-loan-scheme>

Looking ahead

The Bank of England estimates that (due to the increased share of fixed rate mortgages now being 85% compared to closer to 50% in 2007) “over half the impact from two years of interest rate increases is still to be felt”. This leads to the OBR forecasting a drop in housing transactions, and in housebuilding from an already low rate, to just 213,600 in 2025/26.

Worsening market conditions will likely markedly reduce build-out rates. Savills research for the LPDF ‘A New Normal for Housebuilding’ forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet, dropping from the 0.73 average homes sold per week between 2015 and 2021 (and 0.67 before the 2008 recession) to 0.5 - 0.6 over the medium term, taking into account the low and falling number of consented sites in developer pipelines, and the size of each site increasing. As we show (see Figure 5.6 later in this section), a lower number of outlets is correlated with slower build-out rates. The post-2022 conditions are yet to be fully captured in monitoring data, but we would expect this to arise in future years.

There is some room for optimism. The February 2024 RICS residential survey shows sales expectations improving over the next year and a positive sentiment for new instructions of sales for the first time in three years. This is likely at least partly due to a consensus that interest rates have peaked, with UK Finance forecasting mortgage affordability is plateauing, and will improve in 2025²¹.

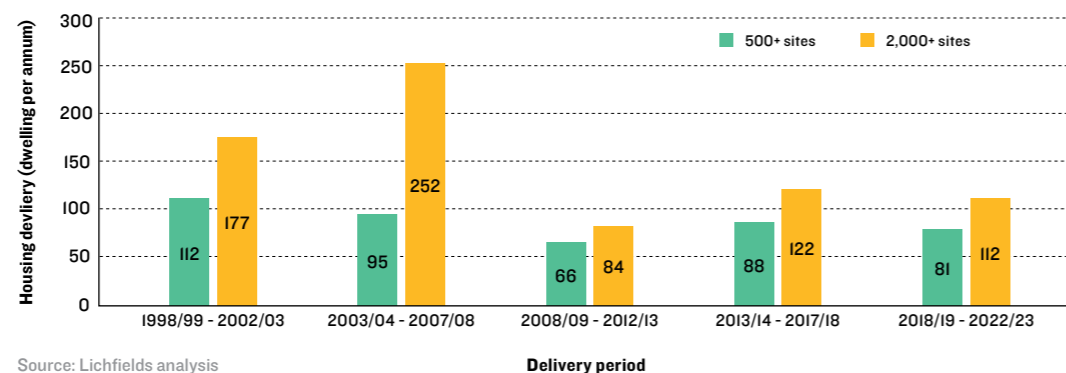
Looking back

The average build-out rates achieved on large sites (Figure 5.2) has fallen over time since before the GFC. The drop-off is most considerable for large sites starting development in the period directly after the GFC. Build out picked up slightly for projects that started in the five years to 2017/2018 taking in the impact of the 2012 NPPF. The COVID-19 pandemic and the rise in interest rates in the 2018/19 to 2022/23 period shows in the slight dip in build-out rate.

The largest sites (2,000+ dwellings) seem to have been hardest hit, falling from a peak average annual build-out of 252 dpa prior to the GFC to just 84 dpa during the recession and early recovery, before increasing again to 112 dpa in the most recent five-year period. However, the drop following 2007/8 may not be solely economically-driven; changes in the type of sites allocated, the structuring of delivery, and relying on s.106 for funding affordable housing and infrastructure may be determinative factors.



Figure 5.2: Average annual build-out rates for large sites (500 or more and 2,000 or more dwellings) by five-year interval



Source: Lichfields analysis

Site specific factors

Do homes get delivered faster in high pressure areas?

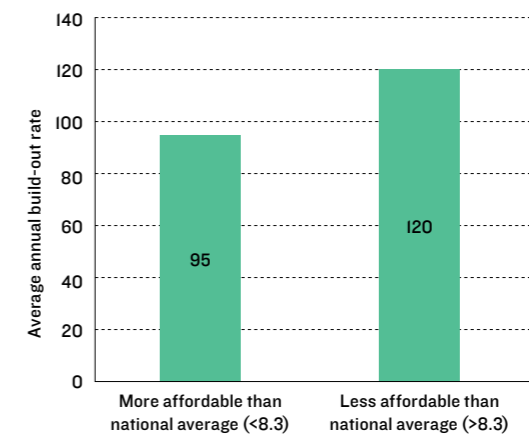
The rate at which homes can be sold (the ‘absorption rate’) determines the build-out rate. The CMA report found that there is strong evidence - from studies (including the second edition of this research) and engagement with stakeholders - that housebuilders (typically buying consented land using the residual land value method) generally respond to the incentive to sell at prevailing market value by building homes at a rate that is consistent with the local absorption rates. This avoids capital being tied up in partly finished or finished but unsold homes.

We have considered whether housing demand at the local authority level affects build-out rates. For the purposes of this research, higher demand areas are assumed to be those with a higher ratio of house prices to earnings, utilising the same measure as that applied in the Government’s standard method for assessing local housing need. Figure 5.3 shows the sample of 500 or more dwelling schemes (that have delivered for at least three years) divided between whether they are located in a local authority above or below the national median affordability ratio (8.3). It shows higher demand areas appear to absorb 26% higher annual build-out rate than lower demand areas²².

Of the five sites identified at Table 4.1 with the highest peak rates of delivery, all but Oakley Vale in North Northamptonshire are in local authority areas with workplace-based affordability ratios more than the national average when those rates were achieved²³.



Figure 5.3 Build-out rates by level of demand using national median 2022 workplace based affordability ratio (dpa)



Source: Lichfields analysis

26%

greater average annual build-out rate in higher demand areas

²² This is in line with the findings of the second edition of the research, albeit both averages are lower this time. The previous research showed the large sites in LPAs which were ‘more affordable than the national average (<8.72) delivered on average 99 dpa versus those large sites in LPAs which were ‘less affordable than the national average (>8.72) at 126 dpa

²³ Using ONS long term affordability data <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandanddwales/2022#:~:text=ln%202022%2C%20full%2Dtime%20employees,6.2%20times%20their%20annual%20earnings>

²¹ <https://www.ukfinance.org.uk/news-and-insight/press-release/mortgage-lending-fall-in-2024>

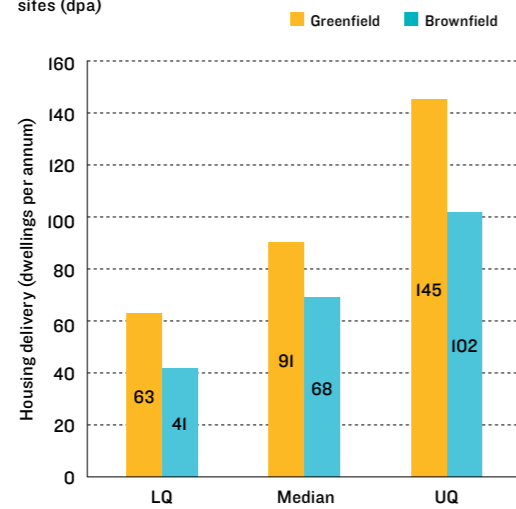
34%

greater annual average build-out rate on greenfield sites

Do sites on greenfield land deliver quicker?

Both previous editions of this research found that greenfield sites have, on average, delivered more quickly than brownfield sites. This remains the case in our updated cohort of sites. The median figures show greenfield sites delivering 34% higher average annual build-out rates. Using lower and upper quartiles to set a range, Figure 5.4 shows that brownfield sites are seen to deliver between 41 to 102 dpa compared with greenfield sites delivering 63 to 145 dpa. This is likely to reflect the fact that brownfield sites are more complex to deliver, can carry extra cost (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provisions, which as shown in Figure 5.5, can boost build-out rates. We consider issues related to apartment-led brownfield schemes in Section 6.

Figure 5.4 Average build-out rates on greenfield and brownfield sites (dpa)



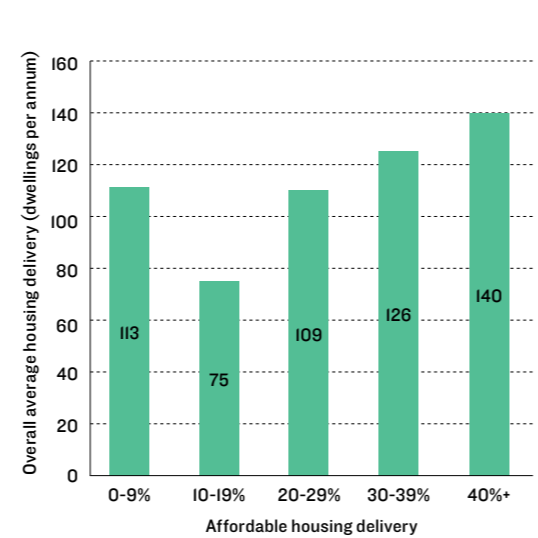
Source: Lichfields analysis

Housing mix and variety

The Letwin Review²⁴ 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. It 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 tested this hypothesis by using affordable housing delivery percentages on site as a marker of a different tenure and the number of sales outlets on a site as a proxy for variety of product types.

Figure 5.5 Average build-out rates by level of affordable housing (dpa)



Source: Lichfields analysis

Affordable housing

Large amounts of affordable housing on a site can boost delivery, if viable, because it taps into an additional source of demand. This is supported by our findings: schemes with the highest proportions of affordable housing (30%+) have the highest average annual build-out rates. However, there is not a direct correlation for those providing lower percentages; indeed, those providing 10-19% affordable housing had the lowest average build-out rates whereas rates on schemes delivering the lowest levels of affordable housing (i.e. less than 10% and some providing zero) were on average higher than those providing 10-29% affordable homes.

Whilst schemes with the highest rates of affordable housing achieve the highest rates, these are likely to be located in the strongest markets for homes to buy and there will, in most cases, be a cap on the proportion of affordable homes that can be achieved on sites without compromising overall viability.

Key worker housing

Among our sample of sites was a scheme delivering significant quantities of key worker housing. This specific type of housing was excluded from our wider research to avoid distorting the data.

Delivery data obtained for North West Cambridge includes annual build-out rates by the University of Cambridge and Hill Residential (Table 5.1). This suggests a specific type of product may yield high annual build-out rates with the peak year of delivery reaching 409 dwellings. The average annual build-out rate for this site is 178 dpa which is significantly higher than other schemes in the 500-999 dwellings category. However, North West Cambridge also comprises apartments which have specific delivery circumstances which make them not be readily compared to the wider research. We consider urban apartment developments on brownfield sites in Section 6.

Table 5.1 Annual build-out rates at North West Cambridge by phase

North West Cambridge	2016/17	2017/18	2018/19	2019/20	2020/21	Average Build-out Rate
Lot 1 (University of Cambridge) KEY WORKER UNITS		117				
Lot 2 (University of Cambridge) KEY WORKER UNITS			264			
Lot 3 (University of Cambridge) KEY WORKER UNITS		232				
Lot 8 (University of Cambridge) KEY WORKER UNITS	73					
Lot M1 (University of Cambridge And Hill Residential)		3	109	7	2	
Lot M2 (University of Cambridge And Hill Residential)		1	36	15	33	
Totals	73	353	409	22	35	178

Source: Lichfields analysis

²⁴ <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

²⁵ <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

Outlets

Across the years in which the number of outlets varied on the same site we have a total of 114 data points from 15 sites. The data is limited to those local authorities that publish information relating to outlets on site. It is a small sample, but larger than that available in our second edition (12 sites, and 80 data points).

We consider the number of outlets delivering dwellings each year. For example, if two phases are being built out in parallel by the same housebuilder this has been counted as one outlet with the assumption there is little variety (although some builders may in reality differentiate their products on the same site, particularly if dual branded). However, if two phases are being built out in parallel by different housebuilders this is counted as two outlets, with the assumption that there would be some variation in the product on offer.

Figure 5.6 shows a clear relationship between the number of outlets on site and the annual build-out rate achieved. Table 5.2 also shows that, although the quantum of completions in a year increases with every additional outlet, the average delivered per outlet increases slightly with four and five outlets.

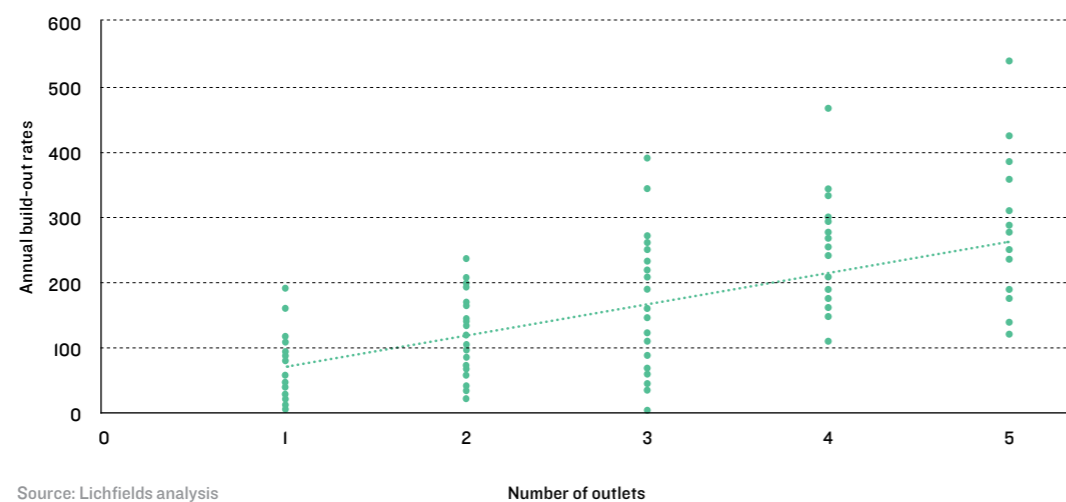
Table 5.2 Average annual completions per outlet

No of outlets	Average annual completions	Average completions per outlet
1	69	69
2	123	62
3	164	55
4	230	57
5	286	57

Source: Lichfields analysis



Figure 5.6: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis

Number of outlets

06 Delivery of brownfield, urban apartment schemes

Government policy is seeking to increase the emphasis on brownfield residential development, and higher density, apartment schemes are likely to be a consequence. What contribution can these sites make to housing trajectories?

We have identified data for nine examples of solely apartment schemes in excess of 250 units on urban brownfield sites (all outside London). This is a reasonable number of units to differentiate sites from lower density suburban apartment developments that might appear in the research. These have been

considered separately from the other large sites in the research and include no other types of dwelling (i.e. no townhouses, semis or detached properties). Some of the large sites analysis already considered will include apartments, potentially for significant proportions of their schemes, but they will include some conventional houses.

Appendix 4 contains a short explanation of the planning history and build-out rates for each of the examples which have informed the analysis in this section. Their locations are shown on Figure 6.1.

Figure 6.1: Map of sites



Source: Lichfields analysis

Lead-in times

Whilst a modest sample size, it is immediately apparent that there is a significant extension in the time it takes for these sites to progress from planning to delivery (Table 6.1 and Figure 6.2).

When compared with comparably sized sites of conventional housing, our sample of apartment schemes have similar planning approval periods but then progressed to delivery much more slowly. This is particularly the case with the larger apartment schemes (500+ units) where the planning to delivery period for those considered was more than three times longer than the benchmarks for large conventional housing sites. For X1 Media City which is 1,100 units, it was more than seven times longer than conventional housing counterparts. Whilst one should be cautious drawing conclusions on a small sample, what might these findings imply?

1. Firstly, when recording the completion of an apartment, this will be alongside others in one or more blocks that are completed in one go, rather than an individual dwelling that can be built and sold as the site progresses. Because it is likely to take longer to complete a block of apartments than a single house. As such, the period over which we are measuring planning to completion of the first apartment will likely be longer.
2. Secondly, as set out in Appendix 4, there can be considerable time spent in 'optimising' a planning permission once the 'original' detailed consent is granted. For example:
 - **X1 Media City:** This scheme was granted detailed consent in 2007. An extension of time application for the original consent was submitted in April 2010 and approved in November 2012.

A further amendment to previously approved planning permission was approved in May 2016. First completions were recorded in 2017/18.

- **University Campus (Chelmsford):** Outline planning permission was granted at appeal in October 2003. Following a public inquiry for Stopping Up Orders and their confirmation in October 2005, the site was sold in 2007. A further process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline and full application were approved in November 2012. First completions were recorded in 2014/15.

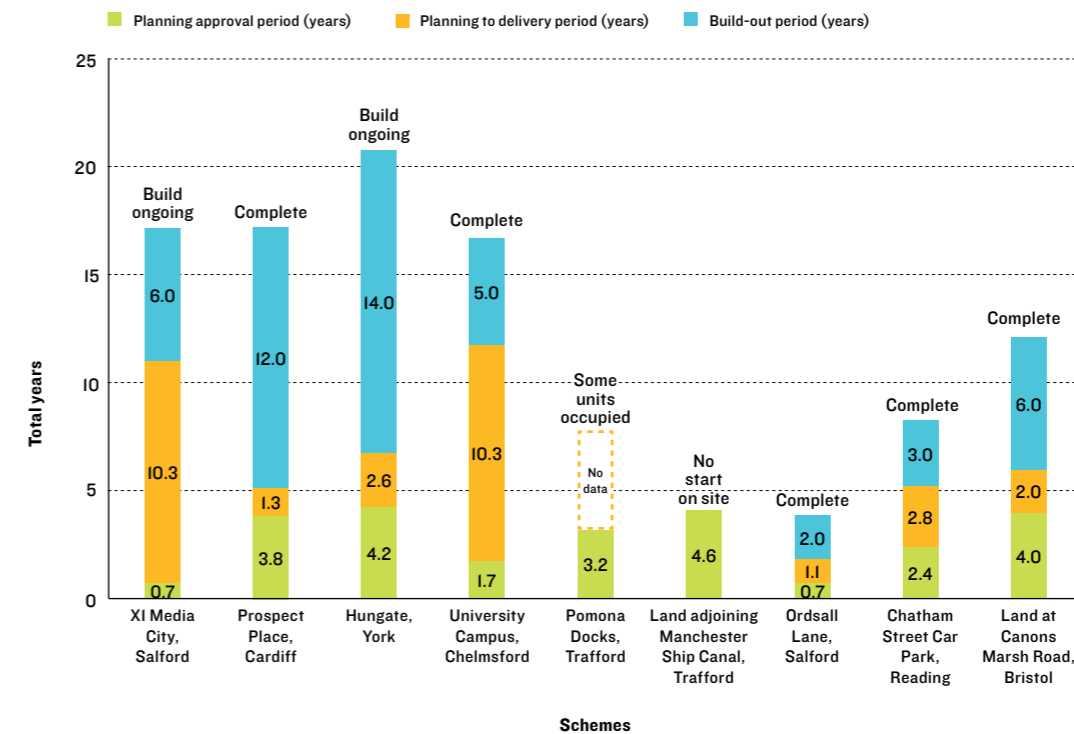
3. Thirdly, brownfield sites at scale can be complex with unusual issues to resolve. For example, Prospect Place (Cardiff) required extensive land reclamation. Further, the viability of delivering brownfield sites of this scale can be finely balanced with schemes susceptible to changes in the costs and values, necessitating redesigns prior to commencement of development.

Table 6.1 Lead-in time analysis for 9 example brownfield apartment schemes

	Site	Site Size (units)	Brownfield apartment schemes		Sites considered in sections 3 & 4	
			Planning approval period (years)	Planning to delivery period (years)	Planning approval period (years)	Planning to delivery period (years)
> 500 units	X1 Media City, Salford	1,100	0.7	10.3	4.9	1.3
	Prospect Place, Cardiff	979	3.8	1.3	3.4	1.5
	Hungate, York	720	4.2	2.6		
	University Campus, Chelmsford	645	2.7	9.0		
	Pomona Docks, Manchester	526	3.2	Unknown		
	AVERAGE			3.5	4.3	
< 500 units	Land adjoining Manchester Ship Canal, Manchester	449	4.4	Unknown	2.8	3.2
	Ordsall Lane, Salford	394	0.7	1.1		
	Land at Canons Marsh Road, Bristol	307	4.0	2.0		
	Chatham Street Car Park, Reading	272	2.4	2.8		
	AVERAGE			2.9	2.0	

Source: Lichfields analysis

Figure 6.2: Lead-in time analysis for brownfield apartment schemes



Source: Lichfields analysis

07 Conclusions

Build-out rates

As explained, the nature of apartment schemes means that annual build-out rates can be lumpy, as homes delivered can only be recorded when a block is completed. Figure 6.3 shows Prospect Place, Hungate, University Campus Chelmsford and X1 Media City with years when many units were completed with subsequent fallow periods of no delivery. Table 6.2 further illustrates this by comparing the peak year of delivery with the average rate.

Apartment schemes may also be more susceptible to downturns in the market – the ‘all or nothing’ requirement (to complete whole blocks before units can be released to prospective purchasers) ties up capital and makes them higher risk for conventional sale. For example, LPAs told us that both Prospect Place and Hungate were significantly impacted by the GFC: each having more than five years in which there were no new completions.

From our sample of nine sites, there is (perhaps unsurprisingly) much variety in the pace at which brownfield apartment schemes obtain planning permission (as there can be with greenfield sites), but more notable is how long it takes some sites to turn that consent into homes

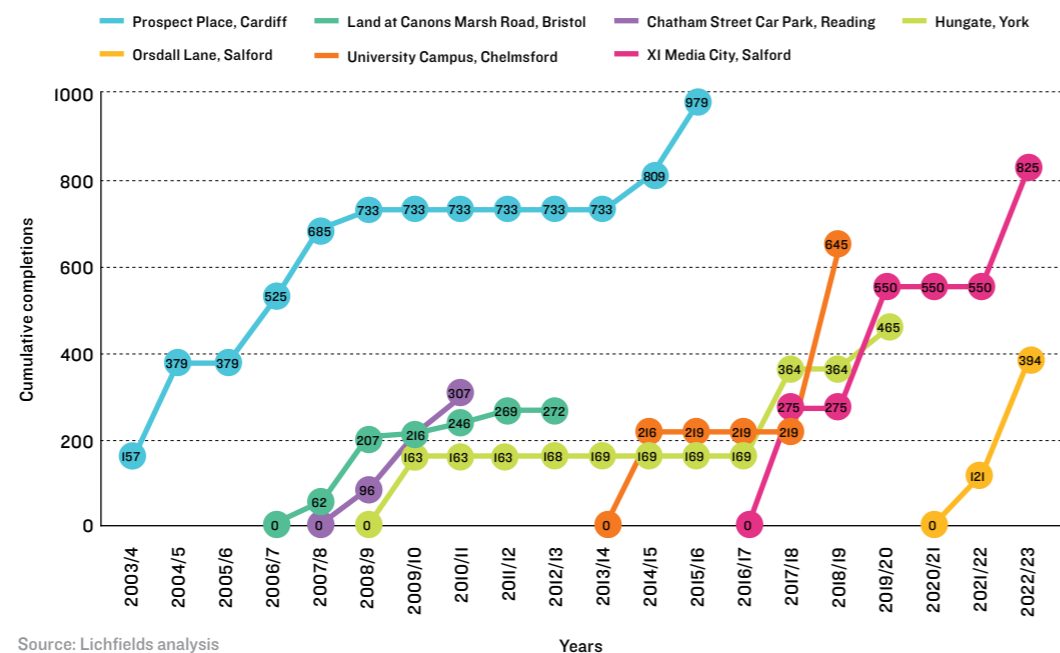
Table 6.2 Peak annual build-out rates compared against average annual build-out rates on the example urban apartment schemes

Site	Average annual build-out	Peak years build-out
Prospect Place, Cardiff	75	222
Hungate, York	33	195
University Campus, Chelmsford	129	426
X1 Media City, Salford	138	275
Chatham Street Car Park, Reading	102	120
Land at Canons Marsh Road, Bristol	45	145
Ordsall Lane, Salford	197	273

Source: Lichfields analysis

available for sale and occupation. Furthermore, while some significant ‘peak’ annual build-out rates can be achieved on these sites, delivery is lumpy and we found the GFC stalled completions on some schemes. Local authorities relying on higher density apartment schemes on brownfield sites to secure their five-year land supply or local plan housing trajectory will need to incorporate more flexibility if they are to be confident in achieving housing requirements.

Figure 6.3: Annual build-out rates for the urban apartment scheme examples (years)



Source: Lichfields analysis

Our research provides real-world benchmarks to assist planning for the effective delivery of large-scale housing. These benchmarks can be particularly helpful in locations where there is limited experience of such developments to inform housing trajectories and land supply assessments. It augments the debate on build-out rates stimulated by the CMA's work. We present some statistical averages to assist the debate, but 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 it is these – alongside the characteristics of individual sites – that needs to be considered carefully by local authorities relying on these projects to deliver planned housing.

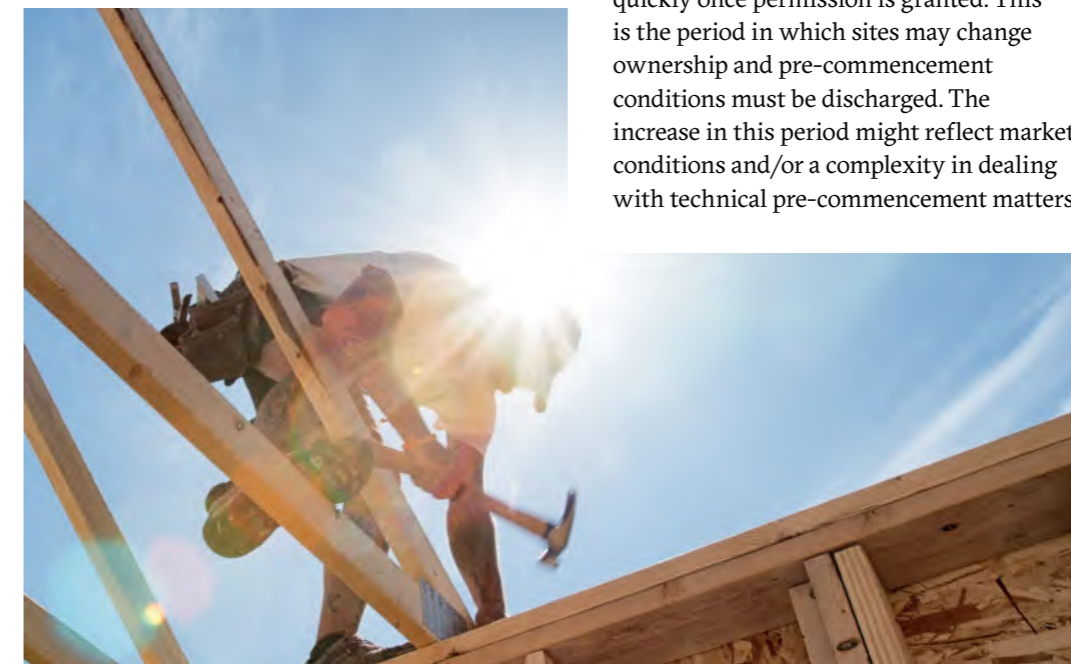
The averages presented in our analysis are not intended to be definitive or a substitute for a robust, bottom-up justification for the delivery trajectory of any given site factoring in local absorption rates. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different and the range in our lower and upper quartile figures for build out illustrates the risk of relying on a singular estimate.

Key findings

1. Only sites below 100 dwellings on average begin to deliver within a five-year period from validation of an outline application

When considering our updated data on lead-in times, it shows only smaller sites with 99 dwellings or fewer will typically deliver any homes within a five-year period from the date that the first application is validated. The lead-in time comprises the planning approval period and the planning to delivery period. Even small sites make a modest contribution within five years as the lead in time is on average 3.8 years. Larger sites of 1,000 dwellings or more on average take five years to obtain detailed planning permission (the planning approval period), meaning at the time the first application is validated, no homes from that site might be expected to be delivered in the forthcoming five-year period.

The planning to delivery period is circa 1.3 – 1.6 years for all sites of 500+ dwellings and does not vary significantly according to site size. This demonstrates the truism that most sites proceed to implementation quickly once permission is granted. This is the period in which sites may change ownership and pre-commencement conditions must be discharged. The increase in this period might reflect market conditions and/or a complexity in dealing with technical pre-commencement matters.



2. Average annual build-out rates on large scale sites are lower than previous editions of this research

The build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of our analysis. The lower and upper quartiles for every size of site category increase as they get larger. Bigger sites deliver more homes each year.

This third iteration of the research has increased our sample size, especially for the largest sites of 2,000+ dwellings (with 43 new examples). Whilst our findings remain comparable, the average rates of build out are slightly lower. The mean build-out rate has marginally decreased for every site size over the three editions of our research. For sites of 2,000+ dwellings the mean has decreased from 161 dpa to 151 dpa. For sites of under 1,000 homes, the median build-out rate is also lower. This may capture characteristics of newly surveyed sites, but also extra monitoring years since 2019 that reflect a market impacted by COVID and the Russian invasion of Ukraine. Our additional sites in the sample are also ones that tended to commence development more recently.



3. Tough market conditions mean a likely slowing in build-out rates and house building overall

Market conditions have a clear effect on house building and the build-out rates of individual schemes. It is in this context that, ceterus paribus, one might expect to see a drop in build-out rates over the next few years. Recent research for the LPDF forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet. Our research shows, a lower number of outlets is likely to lead to slower build-out rates.

There is some room for optimism with the February RICS residential survey showing sales expectations improving over the next year and for the first time in three years, a positive sentiment for new instructions of sales. This is likely at least partly due to a common belief that interest rates have peaked, and mortgage affordability will improve in 2025.



4. Demand is key to maximising build-out rates

The rate at which homes can be sold (the 'absorption rate') at a market value consistent with the price paid for the land determines the build-out rate. The CMA found there is strong evidence from studies and its own engagement with stakeholders, that housebuilders generally respond to the incentive to maximise prices by building homes at a rate that is consistent with the local absorption rates.

Our analysis found that areas with a higher ratio of house prices to earnings had an average 26% higher annual build-out rates on schemes of 500+ dwellings than lower demand areas. The top four highest individual years of delivery in this research (see Table 4.1) are in local authority areas with workplace-based affordability ratios greater than the national average at the time those build-out rates were achieved.



5. Variety is the spice of life

Additional outlets on site have a positive impact on build-out rates, although there is not a linear relationship. Schemes with most affordable housing (30% or more) built out faster, i.e. with higher average build-out rates than those with lower levels of affordable housing delivery; but those delivering 10-10% of their units as affordable had the lowest build-out rates of all. One case study example – in Cambridge – was a predominantly key worker scheme that was able to deliver at an average of 178 dpa, significantly higher than other similar sized schemes included in this research. This points to the principle – identified by the Letwin Review – that, where there is a demand, a mix of homes, complementing market housing for sale, could have a positive impact on build rates.

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6. Large-scale apartment schemes on brownfield land are less predictable forms of supply

The largest apartment schemes delivered on brownfield sites appear susceptible to elongated planning-to-delivery periods compared to the benchmark averages for conventional houses on sites of similar scale. There can be protracted periods of redesign and site sale which means implementation can take longer. They can also be more susceptible to downturns in the market; two of the considered examples stalled after the GFC.

Furthermore, the nature of apartment schemes – built in blocks rather than individual dwellings – also means that annualised build-out rates can be lumpy.

Combined, these factors mean any local authority relying on brownfield apartment developments to meet its housing needs, will likely need to incorporate flexibility in its approach when arriving at a realistic housing trajectory.



Looking forward

The CMA report states at paragraph 4.138:

“While we consider that measures to speed up the pace at which new build housing is supplied to the market may be beneficial (and we set out options for some in the chapter on addressing the problems we have found), these would need to be accompanied by planning reform if they were to deliver increases in housing delivery of the size needed to bring GB housing completions significantly closer to 300,000 per year.”

The CMA’s recommendation on seeking to speed up the pace of new housebuilding should be viewed in the context of this research which, when compared with the first and second editions, shows that reported average build-out rates are slightly lower, albeit only slightly.

As we approach a general election, and with the housing crisis unresolved, the challenge of boosting housing delivery is being discussed with renewed vigour.

The CMA concludes that achieving the necessary step-change in housing output is likely to be reliant on measures to improve the efficiency of the planning system: increasing the speed at which sites progress through the planning system, and then from planning to delivery; in increasing the number of sites granted planning permission for residential development; and increasing the pace and number of development plans being prepared and reviewed. Other factors – including funding for affordable housing and to unblock barriers to site delivery – are also needed.

In the current environment, a sufficient pipeline of sites with planning status in each location (itself dependent on a functioning planning system), with a suitably varied range of housing types and tenures, and the forecast recovery of the housing market from its recent downturn are all necessary to secure a recovery in the supply of new homes.

Appendices

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- Appendix 1: Definitions and notes**
- Appendix 2: Large sites table**
- Appendix 3: Small sites tables**
- Appendix 4: Solely apartment scheme details**

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 also includes 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 approval 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 dwelling/s 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. However, this need not be the detailed scheme which is built out. Many large-scale developments are re-designed over multiple iterations before work starts on site. This can be reflected in a protracted 'planning to delivery period'.

The 'planning to delivery period'

This includes any amended or extension of time planning applications, the discharge of any pre-commencement planning conditions 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'

The month and year is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a midpoint of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The 'annual build-out rate'

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by local authorities, contacting the LPA monitoring officers or planners where necessary and in a handful of instances obtaining the information from housebuilders.

Site name	Local Planning Authority	Site size	Year of first housing completion	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year						
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
Sutton New Hall Farm	Cheshire West and Chester	1,500	2016/17	41	90	13	53	121	49	Dwellings per annum																
Burleyfields (part of the West of Stafford Strategic Development Location)	Stafford	1,500	2020/21	49	98	175																				
Hartland Park	Hart	1,500	2020/21	46	64	66																				
West Carleaze Eco-community	Cornwall	1,500	2021/22	11	60																					
Handley Chase - Steaford South Quadrant	North Kesteven	1,450	2018/19	2	6	29	17	134*																		
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	186	336	302	216	60	108	59	85	49	3												
Rochester Riverside	Medway	1,400	2019/20	126	117	88	127																			
Park Prewett Hospital, Alderaston Road, Basingstoke	Basingstoke and Deane	1,341	1998/99	58	82	37	102	0	0	0	0	307	214	146	33	34	56	7	30	16						
Northern Gateway (Airfields and former Corus site)	Filmshire	1,325	2020/21	112	135	36																				
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	14	64	58	155	103	49	70	67	138	90	163	29	71							
Kings Moat Garden Village	Cheshire West and Chester	1,300	2019/20	5	83	138																				
Bohnore Village	Mid Sussex	1,279	2000/01	10	66	61	244	159	168	52	99	15	0	0	53	68	68	86	61	51	18					
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	281	84	33	24															
Blue Boar Lane	Broadland	1,233	2015/16	75	165	253	243	180	160	110	47															
Picket Twenty	Test Valley	1,219	2011/12	147	178	180	176	164	145	175	96	155	169	124	38											
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	91	47	18	100	59	12	43	64	60	101	61	78	47	1							
Staynor Hall	Selby	1,200	2005/06	1	69	170	28	45	57	53	42	111	90	84	65	46	31	22	15	25	13					
Trumpington Meadows	Cambridge	1,200	2011/12	2	137	141	67	105	89	123	148	72	128	48												
North Ely (Orchards Green)	East Cambridgeshire	1,200	2018/19	49	50	70	80																			
Winnington Urban Village	Cheshire West and Chester	1,200	2013/14	86	159	144	176	62	142	65	70	17														
Heyford Park (Former RAF Upper Heyford)	Cherwell	1,183	2014/15	46	166	106	103	97	58	76																
Oxley Park (East & West)	Milton Keynes	1,159	2004/05	52	166	295	202	115	91	75	163															
Ikfield Port Loop	Birmingham	1,150	2019/20	40	175																					
North West Haverhill, Ann Suckling Road	West Suffolk	1,150	2020/21	89	40	80																				

*(*67 communal accommodation)

Site name	Local Planning Authority	Site size	Year of first housing completion	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year	Year			
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
Orchard Park, Cambridge	South Cambridgeshire	1,120	2006/07	100	290	148	103	95	56	34	16	75	39	30	2	42													
Valmead Farm, Fleet	Hart	1,112	1989/90	1	104	193	89	101	52	101	113	130	74	102	48	4													
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	59	47	102	157	181	19	48																			
Zones 3 to 6, Omega South	Warrington	1,100	2017/18	15	119	111	115	124																					
Llanwrn Village	Newport	1,100	2019/20	31	74	39	52																						
Land at Kingsley Fields	Cheshire East	1,100	2018/19	49	151	125	177																						
Cortam Strategic Site (MDI)	Preston	1,100	2014/15	23	15	61	46	58	43	101	114	211																	
Land north of Woodhall Business Park	Brentwood	1,100	2022/23	20																									
Bankside Phase 1, Banbury (Longford Park)	Cherwell	1,090	2014/15	148	218	140	142	96	167	52																			
Highwood	Horsham	1,090	2012/13	56	82	103	76	96	39	71	43	1																	
Highfields Farm	South Derbyshire	1,064	2016/17	141	204	275	252	102	57																				
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	116	105	108	58	76																		
Gedling Colliery/Chase Farm	Gedling	1,050	2017/18	25	65	96	64	90																					
North East Boxhill (The Gateway)	Rother	1,050	2020/21	23	67	68																							
South Maldon Garden Suburb	Maldon	1,042	2018/19	5	45	111	137	163																					
Tamworth Golf Course (Amington Garden Village)	Tamworth	1,037	2017/18	28	90	155	87	112	68																				
Monkmoor Farm	Daventry	1,000	2013/14	6	65	98	128	122	155	70	100	87	81																
Northampton North of Whitehills SUE	Daventry	1,000	2015/16	9	108	176	59	44	125	124	71																		
Weldon Park SUE	North Northamptonshire	1,000	2016/17	39	62	111	74	75	126																				
Land at former TRL site, Nine Mile Ride (Buckler's Park)	Bracknell Forest	1,000	2018/19	35	132	59	59	140																					
Arkall Farm, North of Ashby Road, Tamworth	Lichfield	1,000	2021/22	4	75																								
Limebrook Park, Wycke Hill, Maldon	Maldon	1,000	2019/20	5	60	85	110																						
RAF Cardington	Bedford	1,000	2014/15	5	108	100	109	36	57	81	144	276																	
Collingtree Park - Northampton South SUE (JCS Policy N5)	West Northamptonshire	1,000	2020/21	98	100																								

Appendix 3: Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery, Leigh	Wigan	471
Farington Park	South Ribble	468
Kingsmead South	Milton Keynes	450
New Central	Woking	445
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	437
Land at former Battle Hospital	Reading	434
Hazelwalls Uttoxeter	East Staffordshire	429
New World House	Warrington	426
Pinn Court Farm	East Devon	426
Radyr Sidings	Cardiff	421
Halifax Road	Barnsley	414
Luneside West	Lancaster	403
Campden Road	Stratford-upon-Avon	400
Chard Road, Axminster	East Devon	400
Woolley Edge Park Site	Wakefield	375
Former NCB Workshops (Portland Park)	Northumberland	357
Hampton Heights	Peterborough	350
Cholsey Meadows	South Oxfordshire	341
Dunston Lane	Chesterfield	300
Land At Dorian Road	Bristol	300
Ryebank Gate	Arun	300

Site Name	Local Planning Authority	Size
Land At Fire Service College, Moreton in Marsh	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Land west of Hayne Lane, Honiton	East Devon	291
Long Marston Storage Depot Phase I	Stratford-upon-Avon	284
Land South of Park Road, Faringdon	Vale Of White Horse	277
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Hortham Hospital	South Gloucestershire	270
Land Between A419 And A417, Kingshill North	Cotswold	270
Land off Henthorn Road	Ribble Valley	270
GCHQ Oakley - Phase I	Cheltenham	262
I28-I34 Bridge Road and Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hewlett Packard (Land Adjacent To Romney House) Romney Avenue	Bristol	242
Hale Road, Wallingford	South Oxfordshire	240
Land adjacent to Tesco, Harbour Road, Seaton	East Devon	230
Hilton Lane, Worsley	Salford	209
Saxon Drive, Biggleswade	Central Bedfordshire	200
Great North Road, St. Neots	Huntingdonshire	199
Hoval Ltd North Gate	Newark and Sherwood	196
Bookbinder Lane, Prescot	Knowsley	191
Biggin Lane, Ramsey	Huntingdonshire	188
Notcutts Nursery	Cherwell	182
Land South of Inervet Campus off Brickhill Street	Milton Keynes	176

Site Name	Local Planning Authority	Size
Sellars Farm	Stroud	176
Queen Mary School	Fylde	169
Littleton Road	Salford	158
North End Road	North Somerset	154
Benson Lane, Wallingford	South Oxfordshire	150
Ottery Moor Lane (former industrial estate), Honiton	East Devon	150
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Shefford Road, Meppershall	Central Bedfordshire	145
Cornborough Road, Bideford	Torridge	143
Alfreton Road, South Normanton	Bolsover	142
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
Astley Road, Huyton	Knowsley	131
North of Douglas Road, Kingswood	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	129
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Shuttlewood Road & Oxcroft Lane	Bolsover	127
Primrose Mill Site	Ribble Valley	126
Bibby Scientific Ltd	Stafford	120
Bluntisham Road, Needingworth	Huntingdonshire	120
Land Between Godsey Lane And Towngate East	South Kesteven	120
Land West Of Birchwood Road	Bristol	119

Site Name	Local Planning Authority	Size
Former Bewbush Leisure Centre Site	Crawley	112
Land South of Station Road	East Hertfordshire	111
Canon Green Drive	Salford	108
Poppy Meadow	Stratford-upon-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Salisbury Road, Hungerford	West Berkshire	100
Auction Mart	South Lakeland	95
North East Sandylands	South Lakeland	94
Parcel 4 Gloucester Business Park Brockworth	Tewkesbury	94
Land At Green Road, Reading College	Reading	93
OS Field 9972 York Road Easingwold	Hambleton	93
Land off Lower Icknield Way, Chinnor	South Oxfordshire	89
MRIO Site, Caistor Road	West Lindsey	89
The Kylins, Morpeth	Northumberland	88
Dappers Lane, Littlehampton	Arun	84
St Marys Road, Ramsey	Huntingdonshire	82
Broad Street, Clifton	Central Bedfordshire	80
Southminster Road, Burnham-On-Crouch	Maldon	80
Land at Willoughbys Bank, Alnwick	Northumberland	76
North East Area Professional Centre	Crawley	76
Cranleigh Road, Chesterfield	Chesterfield	75
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft, Gainsborough	West Lindsey	69

Site Name	Local Planning Authority	Size
Former Wensleydale School, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Land off Crown Lane	Wychavon	68
Springfield Road/Caunt Road	South Kesteven	67
Land Off Cirencester Rd	Stroud	66
Land to the east of Newington Road, Stadhampton	South Oxfordshire	65
Land south of Pinchington Lane	West Berkshire	64
Iveshead Road, Shepshed	Charnwood	63
Mill Lane, Potton	Central Bedfordshire	62
Clewborough House School	Cherwell	60
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Hanwell Fields Development, Banbury	Cherwell	59
Land at the Beacon, Tilford Road	Waverley	59
Land To Rear Of 28 - 34 Bedale Road	Hambleton	59
Thorley Drive, Stoke-on-Trent	Staffordshire Moorlands	57
Shelford Road, Nottingham	Rushcliffe	55
Fenton Grange, Wooler	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm	Wakefield	50
Launceston Road, Bodmin	Cornwall	50
Part SR3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Oxcroft Lane	Bolsover	50

Appendix 4: Solely apartment scheme details

XI Media City, Salford (1,100 units)	
Planning approval period	Planning Approval Period = 0.7 years 06/53636/FUL - Erection of four-26 storey buildings comprising 1036 apartments and 58,475 sq.ft of commercial space for A1,A2,A3,A4,A5,B1,D1 and D2 use together with associated car parking and alteration to existing and construction of new vehicular access Validated - 09/10/2006 Decision issued - 28/6/2007
Extended planning period	10/58887/FUL - Extension of time for implementation of planning permission 06/53636/FUL. Validated - 30/4/2010 Decision issued - 05/11/2012 15/66481/FUL - Amendment to previously approved planning permission 10/58887/FUL. Validated - 11/6/2015 Decision issued - 13/5/2016
Planning to delivery period	Planning to delivery period = 10.3 years
Build period	First completion in 2017/18. 2017/18 - 275 2018/19 - 0 2019/20 - 275 2020/21 - 0 2021/22 - 0 22/23 - 275 Works still ongoing
Notes from LPA	N/A

Prospect Place, Cardiff (979 units)	
Planning approval period	Planning Approval Period = 3.8 years Original outline application 98/425/R Validated - 14/09/1998 Decision issued - 01/03/2001 The first reserved matters application 02/00516/R Validated - 11/03/2002 Decision issued - 21/06/2002
Extended planning period	03/724/R - Reserved Matters for 99 units 03/725/R - Reserved Matters for 58 units 02/1252/R - Full application including 677 apartments 03/01973/R - Full application including 222 residential units 04/2474c - Full changes, increasing the number of flats to 931, reduced to 927 during determination and granted in Feb 2006 06/00613/c - 394 units - granted in Oct 2006
Planning to delivery period	Planning to delivery period = 1.3 years
Build period	First completion in 2003/04 2003/04 - 157 2004/05 - 222 2005/06 - 0 2006/07 - 146 2007/08 - 160 2008/09 - 48 2009/10 - 0 2010/11 - 0 2011/12 - 0 2012/13 - 0 2013/14 - 0 2014/15 - 76 2015/16 - 170
Notes from LPA	The site was 'mothballed' for some years following the financial crash/recession with the principal Tower and another waterfront block not completing until several years later. Initially, this site required extensive and fairly unique land reclamation prior to commencement.

Hungate, York (720 units)	
Planning approval period	Planning Approval Period = 4.2 years Outline application 02/03741/OUT for 720 units Validated - 6/12/02 Decision Issued - 18/07/06 The first approved reserved matters 06/02384/REMM for Phase I erection of 163 units Validated - 27/11/2006 Decision Issued - 26/02/07
Extended planning period	07/01901/REM - Phase II - 154 unit 10/02534/REMM - variation of conditions to increase from 154 to 175 flats 10/02646/FULM - Phase I conversion to 7 townhouses to 14 flats 12/02216/FULM - Phase I conversion to 6 townhouses to 12 flats 12/02282/OUTM - outline to redevelop for 720 units - extension of time to 02/03741/OUT 13/03015/FULM - Phase II 195 units 15/01709/OUTM - Outline for Blocks G and H, 86 and 101 units 17/03032/REMM - Block G 196 units 18/02946/FULM - Increasing Block D to 196 units (increase of 10 units)
Planning to delivery period	Planning to delivery period = 2.6 years
Build period	2009/10 to present. 2009/10 - 163 2010/11 - 0 2011/12 - 0 2012/13 - 5 2013/14 - 1 2014/15 - 0 2015/16 - 0 2016/17 - 0 2017/18 - 195 2018/19 - 0 2019/20 - 101 2020/21 - 0 2021/22 - 0 2022/23 - 0 Blocks D, G and H not developed out yet
Notes from LPA	Build figures provided by York Council. The Council confirmed that there has been a significant complexity in delivering this site and consequently monitoring of delivery.

Pomona Docks II, Trafford (526 units)	
Planning approval period	Planning Approval Period = 3.2 years Full application for 546 apartments (H/58948) Validated - 10/03/2004 Decision Issued - 09/05/2007
Extended planning period	The above scheme was never implemented. 93779/FUL/18 for 526 dwellings across three apartment blocks Validated - 13/03/2018 Decision Issued - 11/04/2019 This has been subject to a number of DoC/NMAs since.
Planning to delivery period	Unknown - unable to obtain completions data to identify year of first completion
Build period	Ongoing - unable to obtain completion data from the Council.
Notes from LPA	As of October 2023 advised that the first 2 towers are complete and construction is underway on the 3rd tower.

University Campus, Chelmsford (645 units)	
Planning approval period	Planning Approval Period = 1.7 years Outline 02/02073/EIA for redevelopment of 692 residential units Validated - 05/02/2003 Decision Issued (appeal) - 17/10/2003 This outline consent was subsequently varied by 04/01825/FUL, principally to provide for a phased discharge of conditions. A reserved matters application was submitted for most of the southern part of the site (04/00865/REM). Validated - 19/04/2004 Decision Issued - 08/10/2004
Extended planning period	Following a public inquiry relating to Stopping Up Orders to paths between Victoria Road South and Park Road and Parkway and Park Road and the confirmation of the Orders (October 2005 FPS/W1525/5/1 refers), the site was sold to Genesis Housing Group in 2007. A long process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline application (11/01360/OUT) and a full application (11/01360/FUL) were both submitted for the Part full (Phase I), part outline (Phase 2) Validated - 31/08/2011 Decision Issued - 02/11/2012 A further full application (14/01470/FUL) for Phase 2 - mixed-use redevelopment including residential Validated - 09/09/14 Decision Issued - 06/02/15
Planning to delivery period	Planning to delivery period = 10 years
Build period	First completions in 2014/15 2014/15 - 216 2015/16 - 3 2016/17 - 0 2017/18 - 0 2018/19 - 426
Notes from LPA	N/A

Land adjoining Manchester Ship Canal - Trafford (449 units)	
Planning approval period	Planning Approval Period = 4.4 years Outline application for up to 550 dwellings (APP: H/OUT/68617) Validated - 24/12/2007 Decision Issued - 30/07/2010 First reserved matters application (78681/RM/2012) Validated - 12/05/2012 Decision Issued - 27/07/2012
Extended planning period	86160/OUT/15 - Application to extend the time limit for the implementation of H/OUT/68617 Validated - 09/07/2015 Decision Issued - 26/09/2019 The overall area was split between two separate sites- 'Land off Hall Lane' and 'Lock Lane'. The reserved matters application for Lock Lane concluded that only 298 dwellings would be included within the development (APP: 100110/RES/20). Validated - 17/02/2020 Decision Issued - 27/01/2021 Meanwhile, a full planning application was submitted for 151 dwellings relating to the Land off Hall Lane part of the site (APP: 100109/FUL/20) Validated - 17/02/2020 Decision Issued - 24/03/2021
Planning to delivery period	N/A - No delivery to date
Build period	None to date
Notes from LPA	N/A

Ordsall Lane, Salford (394 units)	
Planning approval period	Planning Approval Period = 0.7 years Full planning application 19/74531/FUL Validated - 13/12/2019 Decision Issued - 12/08/2020
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 1.1 years
Build period	First completions in 2021/22 2021/22 - 121 2022/23 - 273 Complete in 2 years
Notes from LPA	N/A

Chatham Street Car Park, Reading (307 units)	
Planning approval period	Planning Approval Period = 2.4 years Outline application 03/00825/OUT Validated - 17/07/2003 Decision Issued - 12/10/2004 Full application 05/00849/FUL/JL for phase I comprising a mixed use development including 307 residential units Validated - 27/07/2005 Decision Issued - 29/11/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2.8 years
Build period	First completions in 2008/09 2008/09 - 96 2009/10 - 120 2010/11 - 91 Complete in 3 years
Notes from LPA	N/A

Land at Canons Marsh Road, Bristol (272 units)	
Planning approval period	Planning Approval Period = 4 years Outline planning permission 01/00986/F was first resolved to be approved in October 2001 and the s.106 agreement signed in February 2003. Validation - 01/10/2001 (we do not have a validation date for 01/00986/F so we have used the committee date, as the earliest date we can obtain) Decision Issued - 01/02/2003 Phase 2 - Section 73 Permission Ref: 04/03230/X which encompassed Building 9 for residential development Validated - 30/07/2004 Decision Issued - 03/10/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2 years
Build period	First completions in 2007/08 2007/08 - 62 2008/09 - 145 2009/10 - 6 2010/11 - 33 2011/12 - 23 2012/13 - 3
Notes from LPA	N/A

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