



Millard Tuddenham
Planning and Development

BRECKLAND DISTRICT COUNCIL

FURTHER STATEMENTS TO THE EXAMINATION INSPECTOR

EXAMINATION DOCUMENT EX.79

August 2018

Further Statement In Relation To Examination Document EX.79 (Delivery Rates)

The latest update on delivery of housing provided by Breckland District Council (BDC) [document EX.79] is in our view an unrealistic approach and relies on evidence gathered from various sources over limited and selective time periods in an attempt to justify development build out rates.

The development of a site and its delivery rate is reliant upon a number of factors that do not appear to have been taken into account.

Reliance is placed upon information provided in line with an over simplistic questionnaire (copy attached) sent to various parties; Landowners, Landowner Agents, Land Promoters, Builders and National, Regional and Local Developers.

It has further been stated that BDC have relied upon their own judgements and forecasts where no reply has been received from persons/bodies connected to an approved site. These judgements and the form they have taken in producing the trajectories are unfounded and unsubstantiated.

A site can take up to 5 years from approval before commencement of development and a further 6-12 months before first completion of a dwelling is achieved, dependent upon the level of front ended infrastructure required to achieve delivery.

Therefore it is necessary for BDC to demonstrate that a development profile has been compiled on delivery rates of sites.

Our experiences of a profile of different types of sites is set out below:

| Site Size | 1 | 1-5 | 5-10 | 10-20 | 20-50 | 50-100 | 100-150 | 150+ |
|---|--------|---------|-------|--------|-------|--------|---------|------|
| Type of developer | L B | L B/LSD | L/LMD | LMD/LL | LL/R | R/N | R/N | N |
| Planning Status | DP | OP | OP | OP | OP | OP | OP | OP |
| Time | Months | | | | | | | |
| Need to Gain RM | exists | 5 | 7 | 12 | 12 | 12 | 12 | 12 |
| Lead period to commence construction | 2 | 2 | 3 | 3 | 4 | 6 | 6 | 6 |
| Period to deliver 1 st dwelling (Months) | 7 | 5 | 7 | 7 | 7 | 7 | 8 | 8 |
| Total Period to first delivery (Months) | 9 | 12 | 17 | 22 | 23 | 25 | 26 | 26 |
| First year delivery rate from commencement construction | 1 | 3 | 3 | 5 | 15 | 20 | 20 | 20 |

DP =Detail Permission

OP- Outline Permission

LB=Local Builder

L=Local Small Developer

LM = Local Medium Developer

LL= Local Large Developer

R= Regional Developer

N= National Developer

Our assessment/experience of delivery rates highlights the fact that lead in periods from the gaining of an outline planning consent (OP) to delivery of the first dwelling on sites of 10+ dwellings can take between 22 – 26months.

Delivery rates can vary from site to site dependent upon the builder/developer, location of development and market conditions; it is here that assumptions will vary from site to site and location to location.

Claims are made on development rates that suggest an average of 50 dwellings per year per developer is appropriate and achievable and that a large site of 500 or more dwellings can attract 3-5 or even 7 developers, each producing 50 completions per year. The evidence/justification provided on these delivery rates set out in the EX.79 is overly simplistic.

One issue that has not been addressed is “what evidence has been provided by Breckland to confirm the rate of delivery set out is achievable taking onboard the impact of delivery forecast in the adjacent Greater Norwich Area which when combined forms the Market Area for Housing”.

To illustrate the concern, the tables below set out actual delivery rates for the 7 year period March 2012-2018 and the forecast delivery rates for the 5 year period ending March 2024.

| Actual Completions Year ending 31 March | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | TOTAL | ANNUAL AVERAGE |
|---|--------------|--------------|--------------|--------------|--------------|--------------|---------------------------|---------------|----------------|
| Breckland | 342 | 321 | 416 | 486 | 609 | 789 | 530 | 3,493 | 499 |
| Greater Norwich | 1,182 | 1,238 | 1,241 | 1,676 | 1,728 | 2,251 | 2,401 | 11,717 | 1,674 |
| TOTAL | 1,524 | 1,559 | 1,657 | 2,162 | 2,337 | 3,040 | 2,931 ¹ | 15,210 | 2,173 |

¹ Latest estimate

| Forecast Completions Year ending 31March | 2019 | 2020 | 2021 | 2022 | 2023 | TOTAL | ANNUAL AVERAGE | INCREASE FORECAST OVER ACTUAL |
|--|--------------|--------------|--------------|--------------|--------------|---------------|----------------|-------------------------------|
| Breckland | 503 | 900 | 1,201 | 1,113 | 1,123 | 4,840 | 968 | 94% |
| Greater Norwich | 3,243 | 3,476 | 3,953 | 3,943 | 3,353 | 17,968 | 3593.6 | 115% |
| TOTAL | 3,746 | 4,376 | 5,154 | 5,056 | 4,476 | 22,808 | 4561.6 | 110% |

We can see from the two tables above that across the Market Area yields in the next 5years are forecast to increase by 109%

The evidence provided by BDC fails to consider the numerous impacts such an increase will have across the BDC part of the Market Area which is due to increase by 94% over the average rate achieved in the past 7 years.

Additionally, we note that the BDC forecast delivery rate delivery rate for the 5year period ending 2029 falls from a projected maximum of 1,201 in 2021 to average of 795 per annum a reduction of 34%.

The volatility in the BDC area as a whole is not helpful to organisations involved in the delivery of homes and creates a sense of Local Authority induced instability and uncertainty.

Our final point relates to the reliance upon the delivery of over 50% of the Local Plan requirement within two towns set to accommodate two Strategic Urban Extension Sites (SUE's).

Having checked through the extent of existing approvals, resolutions to grant and allocations (within post code areas NR17 and IP24) total commitments in Thetford (IP24) are 3,486 dwellings and Attleborough (NR17) 3,948 dwellings forecast to be delivered in the period April

2018 to March 2036 totaling 7,434 dwellings against a total forecast delivery of 13,607 meaning that 54%+ of BDC's forward delivery will take place in these two 2 Towns. (Note: these figures are discounted to take into account the lapse provision)

We say that this level of development will not be achieved due to an overreliance on a narrow distribution. To expand, the lack of choice will lead to resistance on the part of developers to compete against each other in two confined locations and resistance from prospective purchasers due to lack of locational choice (I.e other than Thetford and Attleborough the level of choice is constrained).

Finally, we look at the suggestion that multiple developers (4/5/6 or even 7) will share a large site and develop up to 250 per annum.

The figures produced on pages 8-11 of EX.79 are selective and drawn from development in the Norwich Policy Area part of Greater Norwich which has a rather different and more significant draw/attraction than either Attleborough and Thetford.

The example cases and their context in term of delivery are misleading.

For example:

Table 6 of EX.79 copied below looks at a site having 3 developers:

| Whitehouse Farm, Sprowston | | | |
|----------------------------|-----------|------------|------------|
| | 2015/16 | 2016/17 | 2017/18 |
| Persimmon | 23 | 77 | 65 |
| Taylor Wimpey | 7 | 57 | 50 |
| Hopkin Homes | 15 | 61 | 80 |
| Total | 45 | 195 | 195 |

Table 6 Delivery rates at Whitehouse Farm, Sprowston

The Whitehouse Farm site Development Brief was formally adopted as an SPD on 22 May 2007. From the above table we can reasonably assume that development commenced in 2014/15, therefore delivery of the first 45 dwellings took at least 7 years from the adoption date of the SPD and that since development commenced 435 completions have taken place involving 3 developers. On this basis it has taken 11 years to achieve 435 completions i.e. 40 per annum i.e. 10 per developer.

The levels of development set out in the table 6 above confirm our statement that a site is unlikely to deliver more than 20 dwellings by each developer in the first year. The yield over 3 years averages 48 dwellings per developer per year and we maintain that this is due to the specific location of the site in question. The location of a site is a key factor in the interest shown by developers, potential house buyers and therefore the ultimate build out rate. It would be unreasonable to compare the delivery of a site located on the suburbs of Norwich to the SUE's in either Attleborough and Thetford as their appeal to both developers and house buyers is likely to be significantly different.

Looking into the example produced at table 4 in EX.79:

| Development and total size | Developers | Number active in a single year | Max. delivery on whole site in a single year | Max. delivery by an individual developer in a single year |
|---|--|--------------------------------|--|---|
| Queen's Hills, Costessey (1,755+ units) | 7 Developers Barratts Bellway Homes Bovis David Wilson Homes Laing Keir/Twigden Taylor Wimpey | 5 | 339 (2007/08) | 92 (2007/08) |

Table 4 Delivery at Queen's Hills, Costessey, Norfolk

The suggestion here cannot realistically be used as a comparable for the 2 SUE's in question. 2007/2008 saw the highest yield in housing completion for a period of circa 30 years in the Norwich Policy Area. It is stated that completions were achieved by 5 developers however the likelihood is that 33% of those completions commenced in 2006/2007. On this basis 339 dwellings were delivered over a period of 1.33 years giving an average of 36 per year as 7 developers could have been active across the 1.33 years period. In addition 2007/2008 was a 'spike' year for delivery in this location and could have resulted from a substantial number of flats being completed in the period but by the nature of their design and number which completed in one financial year could have taken 2-3 years to construct.

The lack of detail associated with this particular site offers no support for the proposed delivery rates on large sites across Breckland.

As further example is used in table 2 of EX.79:

| | | | |
|---|-----|---------------|--------------|
| Attleborough | | | 44 (2015/16) |
| | | | 22 (2014/15) |
| 3PL/2013/0510/F Thetford Road, Watton | 110 | Hopkins Homes | 4 (2017/18) |
| | | | 60 (2016/17) |
| | | | 44 (2015/16) |
| | | | 2 (2014/15) |
| 3PL/2013/0110/F Land to the East of Brandon Road, Swaffham | 92 | Taylor Wimpey | 51 (2015/16) |
| | | | 29 (2014/15) |
| | | | 12 (2013/14) |
| 3PL/2013/0976/F Norwich Road, Dereham | 200 | Taylor Wimpey | 24 (2017/18) |
| | | | 43 (2016/17) |
| | | | 60 (2015/16) |

Table 2 Delivery rates on large sites in Breckland

In summary and working through 4 sites above from top to bottom.

66 dwellings (22+44) were completed across 2 possibly that in our view meant a 3 year construction period 3 years at an average of 22- 33 per annum

110 dwellings (2+44+60+4) completed over a 4 years period at an average rate of 27 per annum is a good example of delivery and a profile of how a site is developed out. Interestingly

the developer of this site (Hopkins) is the only developer we are aware of who has acquired land on the Thetford SUE

92 dwellings (12+29+51) completed over 3 years at an average rate of 31 per annum.

127 dwellings (60+43+24) completed over 3 years at an average of 42 per annum however first year development profiles point to the possibility that delivery took place over 4 year build time line reducing the delivery rate to 32 per annum.

We have to take the view that the selective methodology applied to the gathering of information has unfortunately (perhaps unintentionally) been tailored in such a way as to justify a 50 per annum completion rate per developer on large sites is realistic. This is a position to which we clearly disagree.

In addition, there is simply no evidence of past delivery rates to support the level of delivery forecast incorporated the trajectories for Thetford and Attleborough as there are no examples provided from sites of between 2,680 and 5,000 dwellings anywhere in Norfolk.

Conclusion.

The evidence provided by BDC in support of their forecast delivery rates are selective and overly simplistic and are therefore unreasonable and unrealistic based on the discussion above.

Furthermore, in Attleborough the single site proposal consisting of 2,680 dwellings has to compete with 11 other sites that are projected to deliver just over 1,000 dwellings over the plan period with circa 700 being delivered in the next 5 years.

The delivery rates being proposed in the 2 SUE's in Thetford and Attleborough are unrealistic and as such we suggest that the plan is unsound.

Attachment 1

Questionnaire Sent to Landowners/Agents/Developers/Promoters

Please complete this questionnaire and email back to planningpolicyteam@breckland.gov.uk

| | |
|----------------------------------|--|
| Planning reference number | |
| Site address | |

| | |
|----------------------------------|--|
| Preferred contact details | |
| Name | |
| Address | |
| Telephone | |
| Email | |

Site deliverability

| | | | |
|-----------------------|--|-------------------------|--|
| Proposed units | | Number Remaining | |
|-----------------------|--|-------------------------|--|

Is this site still expected to be developed? **Y / N** (*please delete as appropriate*)

If you answered yes to the above, please indicate the actual (if applicable) and projected number of dwelling completions for each tax year (April – March).

| | |
|------------------|--|
| 2018/19 | |
| 2019/20 | |
| 2020/21 | |
| 2021/22 | |
| 2022/23 | |
| | |
| 2023/24 | |
| 2024/25 | |
| 2025/26 | |
| 2026/27 | |
| 2027/28 | |
| | |
| Post 2028 | |