

Town and Country Planning Act 1990 (As Amended)

Tunbridge Wells Borough Local Plan
Examination

ASSESSMENT OF HOUSING TRAJECTORY AND LAND SUPPLY

On Behalf of:
Rydon Homes Limited

06 May 2022 v2



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1.0 Instructions and Introduction

1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Rydon Homes Limited ("Rydon") to prepare representations on the soundness of the Tunbridge Wells Borough Local Plan submission version ("the Plan"). Please note that this Technical Paper is an update of the document prepared by Neame Sutton in May 2021 and submitted with Rydon's Regulation 19 Representations.

1.2 This Technical Note focuses specifically on the following matters:

- The Housing Trajectory that the Council propose in the Plan¹
- The consequent inability of the Plan to demonstrate a 5-year housing land supply
- Consideration of the various sources of supply identified by the Council in the Plan
- Consideration of the robustness of the Plan in terms of demonstrating a 5-year housing land supply in the year following the Plan's adoption
- Conclusions on the soundness of the Plan in terms of meeting the core Government objective to significantly boost the supply of housing nationally

1.3 The Plan has been prepared in the context of the Government policy set out in the National Planning Policy Framework ("the Framework 2021") and in this respect the minimum Local Housing Need ("LHN") figure generated using the Standard Method (December 2020) is the figure against which the housing trajectory and consequent 5-year housing land supply position is calculated.

1.4 This Technical Note has therefore been prepared having regard to the Framework 2021 and corresponding National Planning Practice Guidance ("PPG").

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

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

- 2.1 Draft Policy STR1 sets out the minimum housing requirement of 12,204 dwellings, which equates to 678 dpa i.e. the Standard Method calculation of Local Housing Need ("LHN") applicable at the time the Plan was submitted.
- 2.2 The Plan's housing trajectory is summarised in Figure 9 on Page 481 of the Plan with the detail underpinning this contained within the Housing Supply and Trajectory Topic Paper – February 2021². The Council's approach to the supply sources that its housing trajectory is reliant upon is explained in the Topic Paper along with its calculation of 5-year housing land supply at that time i.e. to a base date of 01 April 2020. The Topic Paper comprises an update to the document prepared in support of the Regulation 18 Consultation in September 2019.
- 2.3 No further update has been provided by the Council to this Topic Paper to reflect the latest 5-year housing land supply data as at 01 April 2021. The Council has produced a 5-year housing land supply statement in July 2021 that is prepared to a base date of 01 April 2021³.
- 2.4 This Technical Note is therefore based on the evidence contained in the Council's February 2021 Topic Paper as updated by the more recent 5-year housing land supply statement published in July 2021.
- 2.5 The supply sources the Council relies upon in the trajectory for the Plan are summarised in Table 3 of the Plan (Page 36)⁴:
1. Extant Planning Consents as at 01 April 2020
 2. Windfall allowance small sites
 3. Windfall allowance large urban sites
 4. Outstanding Site Allocations (from extant Local Plan)
 5. New Housing Allocations proposed in the Plan
- 2.6 These supply sources are intended only to meet the Local Housing Need figure calculated via the Standard Method. The Council is not seeking to address any unmet need arising from neighbouring authorities such as Sevenoaks⁵. Clearly there is

² See Pages 29-33

³ See PS_020

⁴ These are also explained further in the Housing Supply and Trajectory Topic Paper – Pages 34 – 41 and in Table 16 on Page 58

⁵ Paragraph 4.21 on Page 47 of the Duty to Cooperate Statement – March 2021 refers

a need to update these supply sources to reflect the Council's latest data to 01 April 2021.

- 2.7 In giving consideration to the Council's supply sources in its housing trajectory it is important to have regard to the requirements of National Policy, namely the Annex 2 definitions of deliverability and developability (as supplemented by the PPG). Most notably is the requirement, placed on the Council by Government, to provide 'clear evidence' of deliverability for all proposed housing allocation sites relied upon for the first 5-years of the Plan period⁶.
- 2.8 This test is vitally important if the Council is to be able to demonstrate a robust (and sound) housing delivery trajectory that at least meets the minimum LHN for the identified Plan period. The Plan should also aim to deliver additional housing over the Plan period to act as a buffer in the event that any of the identified supply sources fail to deliver when the Council expects them too. This matter is covered in further detail below.
- 2.9 Turning now to consider each of the supply sources identified by the Council in its housing delivery trajectory.

(i) Extant Planning Consents as at 01 April 2020 (Commitments):

- 2.10 The Council seeks to rely on a total of 3,313 no. dwellings from extant consents. The majority of these dwellings are programmed for delivery by the Council within the first 5-years of the Plan period commencing in the 2020/21 monitoring year⁷.
- 2.11 The first point to note is that at the Regulation 18 consultation stage the Council considered it appropriate to apply a 10% lapse rate to its small-sites commitment rate (schemes of 1-9 dwellings)⁸. No such allowance has been made in the most recent supply assessment and no reason for removing the lapse rate has been given by the Council.
- 2.12 A 10% lapse rate would be a prudent approach to take given the inherent uncertainty with the delivery of small scale consents across the District. This should be reinstated by the Council to demonstrate a robust approach to its supply assessment for the housing delivery trajectory over the Plan period.

⁶ Annex 2 of Framework 2019 on Page 66 refers

⁷ Although at the time of writing we are in the 2022/23 monitoring year the Plan and the Topic Paper uses a base date of 01 April 2020 whilst the Council's latest 5-year housing land supply assessment (PS_020) uses the base date of 01 April 2021.

⁸ See Paragraph 13, third bullet on Page 4 of 5-year Housing Land Supply 2018/19 – June 2019

- 2.13 The Council does now appear to have given some consideration to its large site commitments and in particular those where only Outline Consents are in place (for 10 or more units). This is in response to the need for 'clear evidence' to be presented that such sites are deliverable within the current 5-year period as required by Annex 2 of the Framework 2021.
- 2.14 The evidence the Council has set out in its Five-Year Housing Land Supply 2019/2020 Position Statement (September 2020)⁹ is limited. This is the evidence that the housing trajectory within the Plan is based. Equally the updated Five-Year Housing Land Supply 2020/2021 Position Statement (July 2021) is also based on limited evidence¹⁰.
- 2.15 The Council relies upon a number of sites for delivery in the first 5-years of the Plan period for which 'clear evidence' has not been demonstrated. One such example is explored below:

2.15.1 **Land adjacent to Hornbeam Avenue Southborough** – The Council seeks to rely on the delivery of 15 no. dwellings from this site during the first 5-year period. This site only benefits from Outline Consent and no Reserved Matters application has been progressed. The Council is currently processing a separate full detailed application but there is no certainty that application will be approved. The Council is seeking to rely on an absence of evidence that the site will not deliver rather than presenting 'clear evidence' that it will deliver. This site should be removed from the current 5-year period.

- 2.16 The consequential impact of the above changes on the Council's housing trajectory is set out in the Neame Sutton trajectory table attached at **Appendix 1**.

(ii) [Outstanding Allocations and New Allocations:](#)

- 2.17 The Council is seeking to rely on a total of 8,274¹¹ dwellings coming forward across the Plan period from a combination of outstanding unimplemented allocations in the extant Local Plan and New Allocations in the Plan. This supply source comprises the majority of the Council's supply for the Plan period (62.4% of the total supply).

⁹ Paragraphs 20-21 on Pages 12-14 of the Five-Year Housing Land Supply 2019/2020 Position Statement

¹⁰ PS_020

¹¹ Figure set out in Table 16 on Page 58 of the Housing Supply and Trajectory Topic Paper – February 2021

2.18 Neame Sutton has undertaken a review of each of the proposed allocation sites in the context of the requirements of the Framework 2021 (particularly Annex 2) and the PPG. The following key points have arisen from that analysis:

2.18.1 **Point 1:** The Council is relying on delivery from two strategic scale allocations that are required to provide 2100 dwellings and 3540 dwellings respectively¹². Whilst the Council has set out the evidence it has relied upon for the projected delivery rates from these sites in the Strategic Sites Topic Paper (March 2021) it has also freely accepted that it has no experience of delivering development of this scale¹³.

2.18.2 The Council should therefore be taking a cautious approach to the delivery trajectory for these two sites. It is clear however from the trajectory in the Housing Supply and Trajectory Topic Paper that this is not the case. For example the Council expects the Paddock Wood site to deliver 300 no. dwellings in its first year and to continue this level of completion year on year through until the end of the Plan period¹⁴. This is simply unrealistic.

2.18.3 A more appropriate delivery trajectory for Paddock Wood and Tudeley Village is set out in the sub-section below that reflects current empirical evidence of delivery from sites of this scale across the country.

2.18.4 **Point 2:** The Council is seeking to rely on delivery from a number of proposed allocations within the first 5-years of the Plan period without presenting any evidence that these sites are capable of delivering completions, let alone 'clear evidence' that completions will take place within the first 5-years of the Plan period. In fact the Five-Year Housing Land Supply 2019/2020 Position Statement only considers delivery from 6 no. allocations all of which are carried over from the old Local Plan.

2.18.5 In considering the 6 no. allocations and placing some reliance on delivery from them in the first 5-years of the Plan period¹⁵ the Council is dependent on its own 'estimate' of delivery, which has been discounted by 10%. This does not amount to 'clear evidence' of delivery. For the remaining 21 sites that the

¹² Tudeley to provide 2,100 dwellings and Paddock Wood to provide 3,540 dwellings

¹³ See Paragraph 4.34 on Page 22 of the Housing Supply and Trajectory Topic Paper – February 2021

¹⁴ This represents a slight reduction from the Council's expectation of 333 dpa set out at the Regulation 18 consultation stage

¹⁵ See Table 3 in Appendix 2 of the Five-Year Housing Land Supply 2019/2020 Position Statement

Council is expecting dwelling completions in the first 5-years there is no evidence.

2.18.6 In Neame Sutton's view all of the supply relied upon from proposed allocations within the first 5-years of the Plan Period should be removed. The effect of this change is set out in the Neame Sutton Trajectory attached at **Appendix 1**.

(iii) Strategic Allocations – Paddock Wood and Tudeley:

- 2.19 The Council's current housing delivery trajectory is heavily dependent on two Strategic Allocations, which together account for 5,640 dwellings (68% of the allocations proposed within the Plan).
- 2.20 The delivery trajectory set out in the Housing Supply and Trajectory Topic Paper expects delivery from both locations in the monitoring year 2025/26 at a rate of 300 dpa for Paddock Wood and 150 dpa for Tudeley.
- 2.21 The evidence base that underpins the Plan includes detail on the strategic sites set out in the Strategic Sites Topic Paper (March 2021) and a range of other documents¹⁶.
- 2.22 Nowhere in the evidence base does the Council provide detail to support its housing delivery trajectory for the two sites.
- 2.23 In fact the Strategic Sites Topic Paper confirms the 'anticipated' development that 'could' be delivered from each site¹⁷.
- 2.24 Furthermore the Housing Supply and Trajectory Topic Paper confirms that the Council has no prior experience of dealing with sites of this scale and the delivery set out in Table 7 on Page 22 is lacking detail and unclear as to when the Council would expect to see dwelling completions and importantly how many completions.
- 2.25 On the latter point the Council appears to be relying on evidence from the Letwin Review 2018 for evidence of build out rates on sites of 2,000+ dwellings (Table 8 on Page 25 refers). The same table also confirms that any build out evidence from the actual site promoters is 'to be confirmed'.

¹⁶ Strategic Sites Master planning and Infrastructure Main Report and Appendices, Infrastructure Delivery Plan, Local Plan Viability Assessment and Appendices and the SA.

¹⁷ Paragraph 4.37 on Page 16 and Paragraph 5.26 on Page 22 refer.

- 2.26 The Council's application of a delivery rate of 299 dpa taken solely from Letwin is not robust, particularly taking into account the fact that the Council's has not sought to review more up-to-date evidence from Lichfields published in February 2020. In fact the Housing Supply and Trajectory Topic Paper still references the older 2016 version of the Lichfields evidence.
- 2.27 Given the lack of specific delivery evidence in relation to the two strategic allocations Neame Sutton considers the Council should adopt a trajectory that is reflective of the wider data set provided in the most recent Lichfields evidence published in February 2020 (see **Appendix 2**).
- 2.28 An updated delivery trajectory for each of the strategic sites is therefore set out below:

Table 1: Paddock Wood Delivery Trajectory:

Realistic Delivery Trajectory for Paddock Wood Strategic Allocation Site									
2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	
0	0	0	0	0	120	120	240	240	
2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	TOTAL
240	240	240	240	240	240	240	240	240	2880

Notes:

1. Predicated on delivery from eastern side first, which is currently unconstrained by Green Belt and based on two outlets at a rate of 60 dpa each. This delivery would be dependent on the submission of an Outline Application for the eastern side by late 2021. The western side of the site will likely follow behind given the constraint of Green Belt and for that reason its delivery start time has been moved back by 1 year.
2. The delivery of 300 dpa relied upon by the Council has no basis in evidence. Lichfields confirm in table 5 on Page 11 (see Appendix 2) that no sites within the data set have been able to consistently deliver 300 dpa.
3. A more realistic delivery rate of 60 dpa per outlet is considered to represent a robust approach to the delivery trajectory for this site. Therefore based on a total of 4 outlets (Paragraph 4.36 on Page 16 of the Strategic Sites Topic Paper) the site should be able to deliver a maximum of 240 dpa.

Table 2: Tudeley Village Delivery Trajectory:

Realistic Delivery Trajectory for Tudeley Village Strategic Allocation Site									
2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	
0	0	0	0	0	0	0	0	0	
2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	TOTAL
0	50	150	150	150	150	150	150	150	1100

Notes:

1. Unlike Paddock Wood, which is a settlement expansion, Tudeley Village is an entirely new settlement wholly constrained by the Green Belt.
2. The Council has presented no delivery evidence for this site to support its trajectory. The site is controlled by the Hadlow Estate, which is not a developer. The delivery trajectory proposed for the

- site has been advanced by the Council and not the site promoter. This is confirmed in the site promoter's own promotion material – Page 55 of Tudeley Village Delivery Strategy – December 2020.
3. In the absence of any clear evidence to support a delivery trajectory Neame Sutton considers the empirical evidence set out by Lichfields is a robust basis for setting out a delivery trajectory in the Plan. Figure 4 on Page 6 of Lichfields (see **Appendix 2**) confirms an average time of 8.4 years from the submission of the first application to the delivery of the first completion on the site.
 4. Assuming an application submission in the monitoring year 2022/23 then 8 years would lead to completions in 2030/31 onwards.
 5. For the first year the level of completions is likely to be lower and therefore 50 dpa has been applied rising to 150 dpa thereafter.

(iv) Windfalls:

2.29 The Council places relatively heavy reliance upon windfalls to help meeting the minimum local housing need for the Plan period. A total of 1670 no. dwellings¹⁸ are relied upon at a rate of 122 dpa for the first 7 years (from 2023/24) dropping to 102 dpa for the remainder of the Plan period¹⁹.

2.30 Whilst the evidence for a windfall provision is set out in the Housing Supply and Trajectory Topic Paper, it is important to note the following points:

2.30.1 **Point 1:** The Council's evidence in the Topic Paper is based primarily on historic trend data. In a Borough that is constrained by Green Belt and, in the absence of an up-to-date Local Plan, the historic trend data is likely to contain higher windfall rates than will prevail in the future.

2.30.2 **Point 2:** The Council seeks to rely on 244 dwellings from windfalls in the current 5-year period yet no compelling evidence has been presented as required by Paragraph 71 of the Framework 2021 to demonstrate that this is a reliable source for delivery in the first 5-years. This component of supply should be removed.

2.30.3 **Point 3:** Given that even the Council concedes the windfall allowance will reduce to 102 dpa, Neame Sutton considers that should be the maximum level relied upon in the trajectory. There is even a case for going lower than this given the stance taken by the Council at the Regulation 18 consultation stage i.e. 50 dpa.

¹⁸ This is increased substantially from 700 no. dwellings at the Regulation 18 consultation stage.

¹⁹ This is increased from 50dpa at the Regulation 18 consultation stage.

(v) Summary of Changes to Council's Supply Sources:

2.31 As a result of the above headline points the effect on the Council's supply sources is summarised in the table below:

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

Supply Source	Council	Neame Sutton	Difference
Extant Planning Permissions	3,949	3,949	0*
Windfall Allowance	1,670	1,224	-446**
Site Allocations	8,274	6,614	-1660***
TOTAL	13,893	11,787	-2,106

*Difference in delivery trajectory to reflect Annex 2 in relation to first 5-year period

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

***Adjustments to delivery trajectory to reflect Annex 2 in relation to first 5-year period. Adjustments to Paddock Wood and Tudeley to reflect realistic delivery trajectory

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

(vi) Application of the Appropriate Buffer (Paragraph 74 of the Framework 2021):

2.33 In addition to the above points relating to supply and given that this Plan is being progressed in compliance with the Framework 2021 the Council should have tested its trajectory on the basis of a 10% buffer applied in accordance with Paragraph 74 b). Instead the Council has only applied a 5% buffer, which cannot be correct where it will seek, in due course, to place reliance on the safeguard in Paragraph 75 and footnote 40 of the Framework that is afforded to a recently adopted Plan.

2.34 A 10% buffer should therefore be applied to the housing requirement figure in the trajectory if the Council wishes to fix its 5-year supply as part of this emerging Local Plan process.

2.35 It is also important to consider the inclusion of a buffer in terms of overall supply across the Plan period to enable the Plan to deal with any unforeseen changes in supply such as one of the strategic sites not delivering when it was expect to.

2.36 Currently the Council has included a buffer or over provision of 8.6% above the minimum LHN for the Plan period, which equates to 1,053 dwellings.

- 2.37 In an authority that is constrained by Green Belt it is considered that a buffer of only 8.6% is insufficient, particularly given that the Plan's development strategy is so heavily reliant upon two strategic development locations accounting for nearly 70% of all allocations proposed in the Plan.
- 2.38 Additionally, given the weaknesses in the Council's delivery strategy identified in this note, this places greater importance on the Plan including a reasonable buffer or over provision to ensure that it does not fall short of meeting its stated development objectives early in the Plan period.
- 2.39 Finally, it is clear that there is unmet need arising from Sevenoaks, which has not been addressed. In fact the Council's stance is that it will not make any specific provision for unmet need arising from Sevenoaks despite a figure of 1,900 dwellings being provided²⁰²¹.
- 2.40 For these reasons Neame Sutton considers that a minimum 20% buffer should be applied to the overall supply included in the Plan.
- 2.41 The affect of a 20% buffer or over provision is summarised below:

Table 4: Summary of Affect of 20% Buffer on Total Supply over the Plan Period

Supply Source	Council	Neame Sutton
LHN for Plan Period 678 dpa	12,204	12,204
Supply Identified	13,893	11,787
LHN with 20% Buffer for Plan Period	14,645	14,645
Additional Allocations Required	752	2,858

²⁰ See Paragraph 4.24 on Page 47 of the Duty to Cooperate Statement – March 2021.

²¹ It should be noted that despite the Duty to Cooperate Statement being prepared in March 2021 the Council are aware of the evolving situation in Sevenoaks regarding the attempt by Sevenoaks District Council to JR the Decision of its Inspector to reject its plan on legal compliance grounds including DfC matters. This Council should therefore be taking a more proactive approach under the terms of the DfC towards meeting clearly identified unmet needs.

3.0 5-Year Housing Land Supply

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

Static 5-Year Housing Land Supply as at 01 April 2021:

3.2 The only 5-year supply calculation provided by the Council is set out in Five-Year Housing Supply 2020/21 Position Statement. That document confirms that the Council cannot currently demonstrate a 5-year housing land supply. Table 1 on Page 7 confirms the Council's position at **4.93 years** (shortfall of **-52 dwellings**). The Council subsequently updated this position to reflect ownership issues with a site at Brook House. Consequently the Council's position published in August 2021 was reduced to **4.89 years** (shortfall of **-77 dwellings**). Despite the update made the Council its supply position remained optimistic and has subsequently been tested in two S78 Inquiries²² resulting in the Council's position being updated in March 2022 to **4.66 years** (shortfall of **-239 dwellings**).

3.3 It is therefore clear that the Council cannot currently demonstrate a 5-year housing land supply. This is a significant concern that must be resolved by the Plan if it is to be found Sound.

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

3.4 Neame Sutton's Table 1 in Appendix 1 of this Note provides a rolling 5-year supply calculation based on the Council's own data and appears to confirm a relatively healthy positive position, which does not reflect the Five-Year Housing Supply 2019/20 Position Statement or the more recent 2020/21 Position Statement (PS_020). This is because the Council's housing trajectory for the Plan period includes allocations within the first 5-year period that do not meet the Annex 2 test of deliverability.

3.5 However, when the adjustments are made to the Council's supply sources as set out in Section 2 of this note the supply position alters dramatically and is more reflective of the latest 5-year supply conclusions reached by the two S78 Inspectors during 2021.

²² Hawkhurst Golf Club Appeal – PINS Ref: 3273022 – Inspector concluded a supply of only **4.38 years**. Highgate Hill and Cophthall Avenue Appeal – PINS Ref: 3282908 – Inspector concluded a supply of only **4.61 years**.

- 3.6 Table 2 in Appendix 1 sets out the rolling 5-year housing supply position with the supply sources amended and confirms that at only one point during the Plan period will the Plan deliver a positive 5-year supply position.
- 3.7 It is important to note that this position will persist even if one was not to apply all of the adjustments set out in Section 2 of this Note.
- 3.8 The Plan therefore fails the key Soundness test of planning positively and is not in accordance with National policy to help significantly boost the supply of housing.
- 3.9 It is also important to note that the trajectories set out in Appendix 1 are still based on the out-of-date evidence to a base date of 01 April 2020 in order to be consistent with the Council's own out-of-date evidence. It is vital that the Council updates its position set out in the Topic Paper and in turn amends Figure 9 of the Plan to reflect the latest data, which should be to a base date of 01 April 2022 given that we are now within that monitoring year. At that point Neame Sutton reserves the right to review and update the evidence set out in this Technical Note.

4.0 Conclusions on Soundness of Plan

- 4.1 On the basis of the assessment undertaken in this Technical Note it is apparent that the housing trajectory proposed for the Plan will not deliver a rolling 5-year supply of deliverable housing sites and as a consequence the Plan is unsound as currently drafted.
- 4.2 The Council has placed too much reliance on two strategic allocations (nearly 70% of all the allocations proposed in the Plan), which will take a considerable period of time to deliver and currently the evidence base on the delivery trajectory for both sites is insufficient and uncertain. Other sites are relied upon within the first 5-years of the Plan period without any 'clear evidence' of delivery and the Council places reliance on a significant amount of delivery from unidentified windfall sites (nearly 13% of the total supply). Furthermore the Plan includes insufficient contingency in the form of a buffer or over provision across the Plan period. As a consequence the Council is reliant upon delivery from all sources at the time it has identified with very little scope for slippage or change before the trajectory and ultimately the Plan fails.
- 4.3 All of the above points and the detailed evidence contained in the earlier sections of this Technical Note have been predicated on the Council's proposed LHN of 678 dpa. In other words the evidence in this Technical Note has demonstrated the housing delivery strategy set out in the Plan is unsound and further allocations are required before any consideration is given to whether the LHN figure of 678 should be increased to accommodate unmet need arising from neighbouring authorities and other factors such as the worsening affordability situation in the Borough.
- 4.4 As set out in Neame Sutton's Matter 2 Statement made on behalf of Rydon (Section 2) there is clear evidence to support an uplift to the LHN particularly to address unmet need arising from Sevenoaks. As a starting point the uncapped Standard Method figure of **749 dpa** should be used in the Plan. This would deliver a further **1,278 dwellings** over the Plan period making a meaningful contribution to the unmet need arising from Sevenoaks.
- 4.5 Clearly if the minimum housing requirement is set at **749 dpa** or **13,482 dwellings** this would further increase the number of dwellings that would need to be provided through new allocations.

- 4.6 The solution for the Council is a simple one. Further site allocations are required to ensure adequate delivery of the right sites at the right time to ensure a robust housing delivery trajectory and consequently a positive rolling 5-year supply position.
- 4.7 The available evidence base clearly demonstrates that there is sufficient supply within the Borough to properly plan for the needs of the Borough's residents and to help address the unmet need arising from Sevenoaks.
- 4.8 The Council must therefore take action now to address the shortfall, which is a fundamental failure in terms of the Soundness of the Plan as currently drafted.
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Appendix 1

Housing Trajectories:

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

Appendix 2

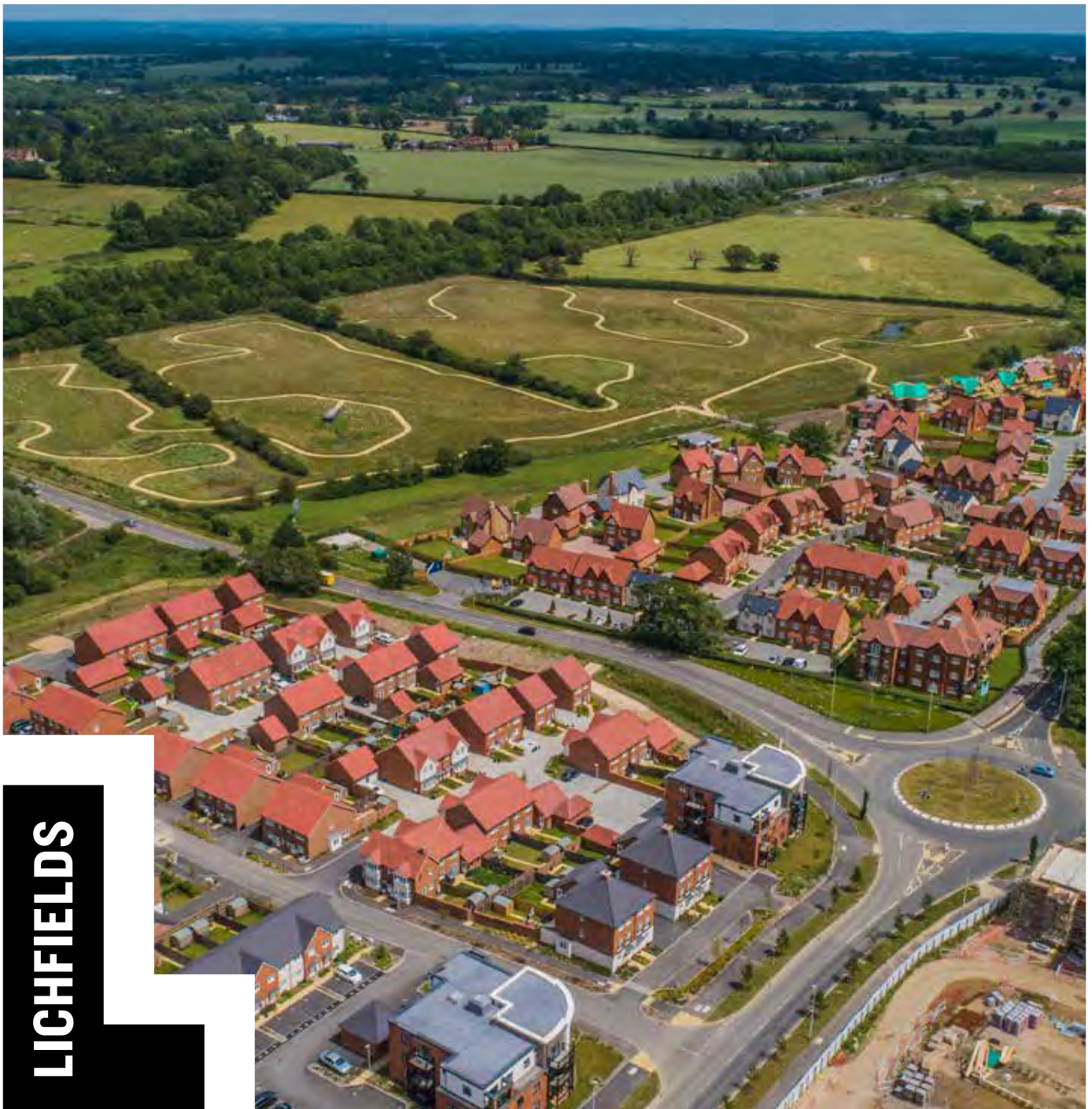
Lichfields - Start to Finish: How Quickly do Largescale Housing Sites Deliver – February 2020

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FEBRUARY 2020

Start to Finish

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

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Executive summary

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

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

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

We have drawn four key conclusions:

<p>1 Large schemes can take 5+ years to start</p>	<p>2 Lead-in times jumped post recession</p>
<p>Our research shows that if a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in c.3 years. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.</p>	<p>Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors.</p>
<p>3 Large greenfield sites deliver quicker</p>	<p>4 Outlets and tenure matter</p>
<p>Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units. Furthermore, large scale brownfield sites deliver at a slower rate than their greenfield equivalents: the average rate of build out for greenfield sites in our sample is 34% greater than the equivalent brownfield.</p>	<p>Our analysis suggests that having additional outlets on site has a positive impact on build-out rates. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale.</p>

Key figures

180

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

c.3yrs

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

8.4yrs

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

160 dpa

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

68 dpa

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

+34%

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

61 dpa

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

01 Introduction

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

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

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

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



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

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180

sites

97

large sites of 500
units or more

27

additional sites
compared with our
2016 research

8

sites also included
in Sir Oliver Letwin's
review

O2

Methodology

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

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

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

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

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

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

Development and data

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

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

Box 1: Letwin Review sites

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

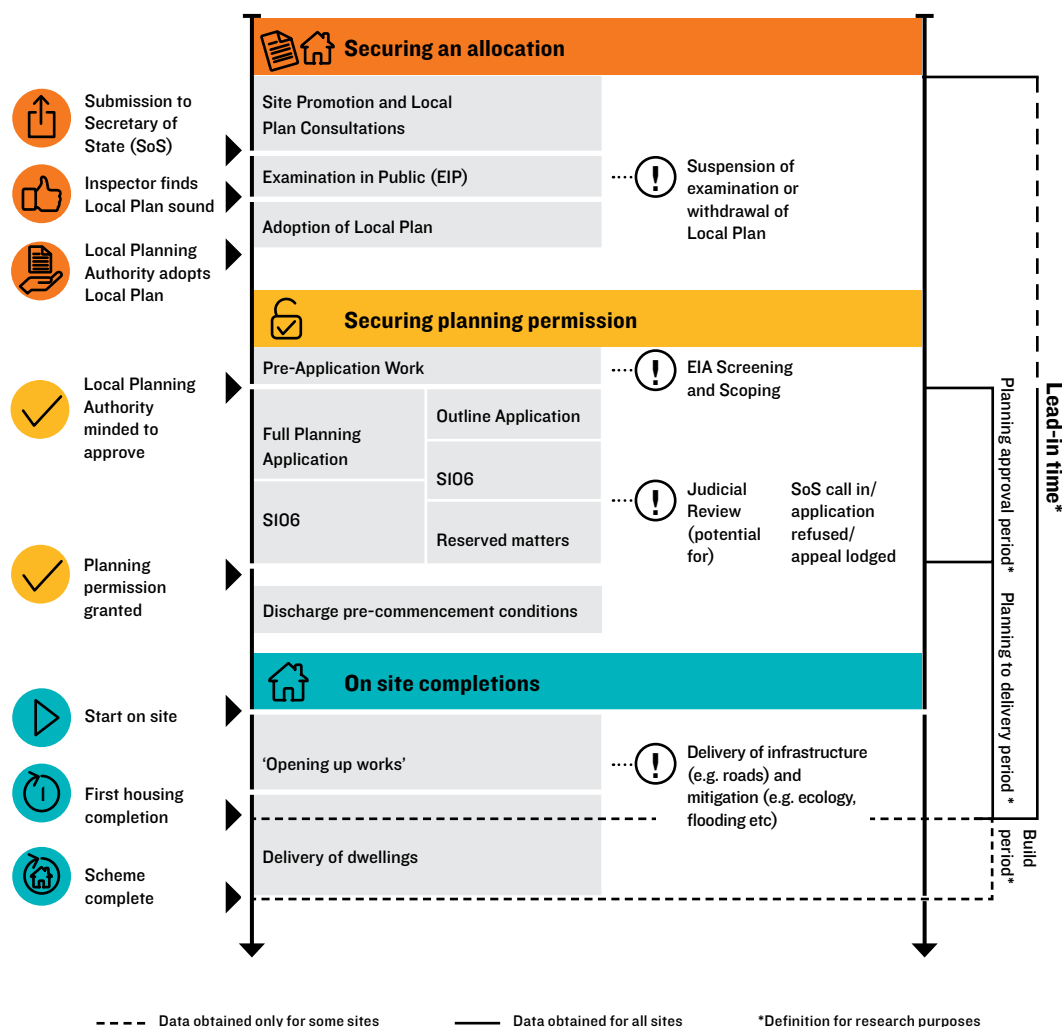
when it was difficult to obtain reliable data. The study therefore includes the Letwin Review's case studies listed in Box 1.

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

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

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

Figure I: Timeline for the delivery of strategic housing sites



¹ Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

196,714

units on large sites
of 500 or more
homes

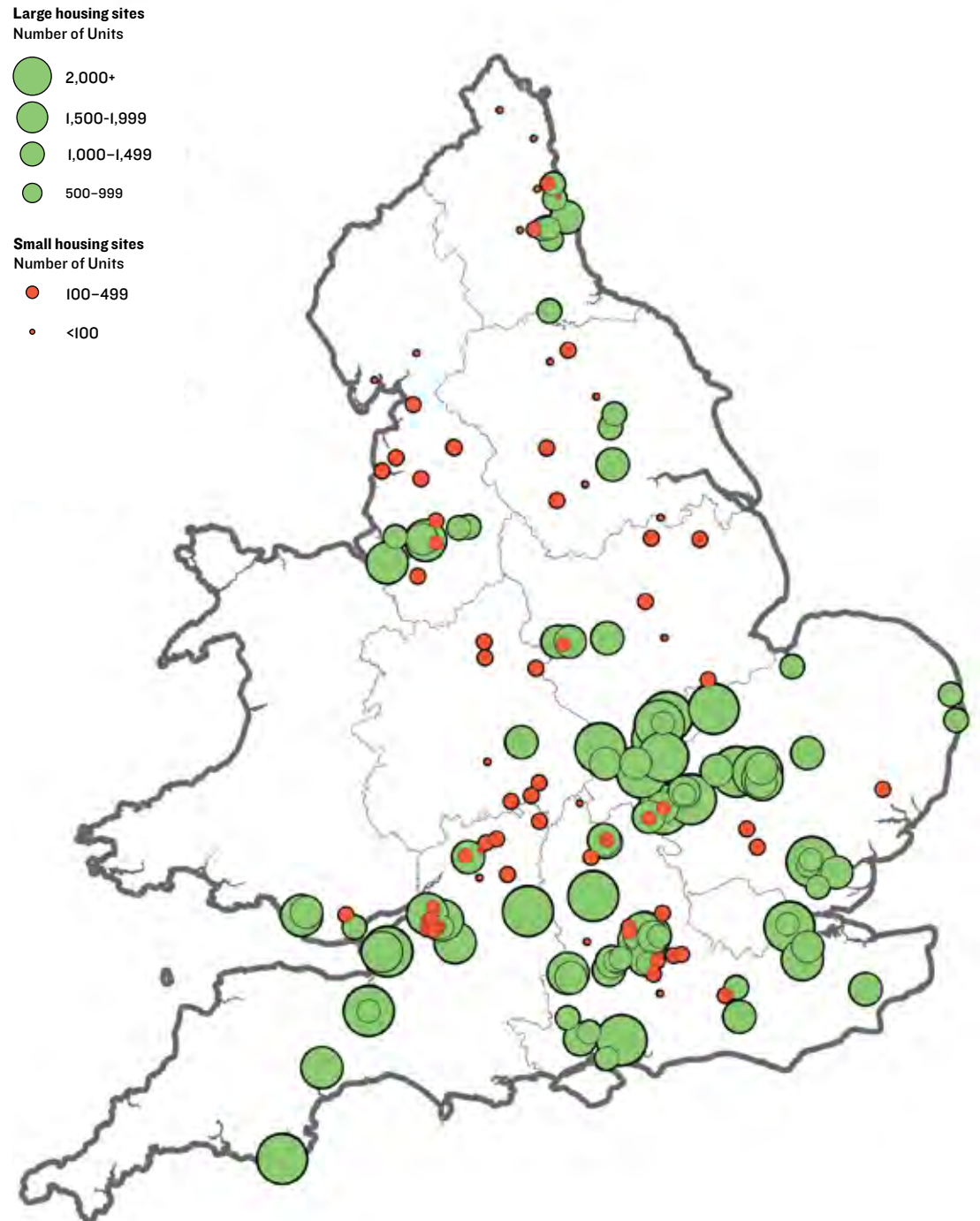
16,467

units on small sites
under 500 homes

35

sites of 2,000
homes or more

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



Source: Lichfields analysis

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

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

The new definition of 'Deliverable'

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

"sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be

considered deliverable where there is clear evidence that housing completions will begin on site within five years". (emphasis added)

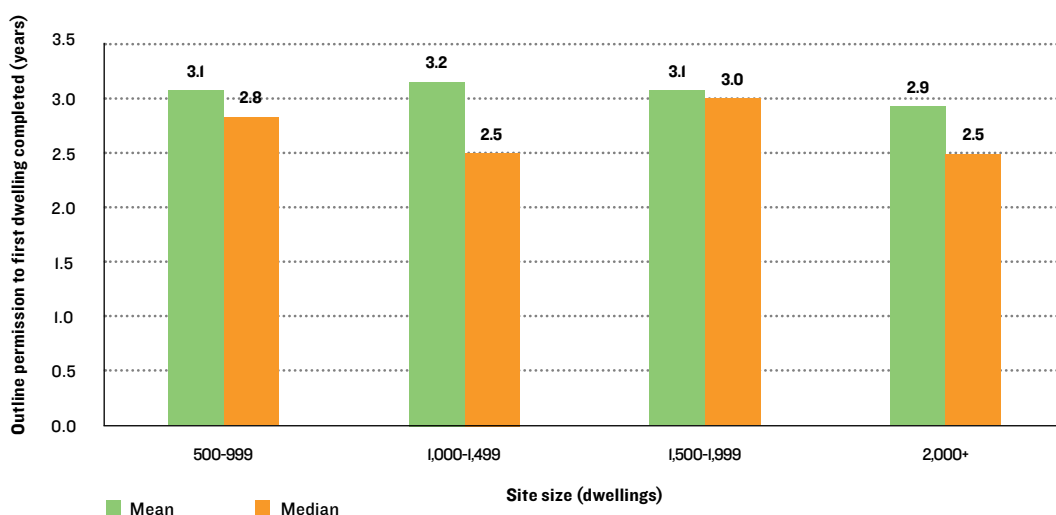
What constitutes 'clear evidence' was clarified in a number of early appeal decisions and in the Planning Practice Guidance² and can include information on progress being made towards submission of a reserved matters application, any progress on site assessment work and any relevant information about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

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

c.3 years

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

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



Source: Lichfeilds analysis

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



Only sites of fewer than 499 dwellings are on average likely to deliver any homes within an immediate five year period.

always obtained by the company that builds the houses, indeed master developers and other land promoters play a significant role in bringing forward large scale sites for housing development³. As such, some of these examples will include schemes where the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period.

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

Comparison with our 2016 findings

Planning Approval Period

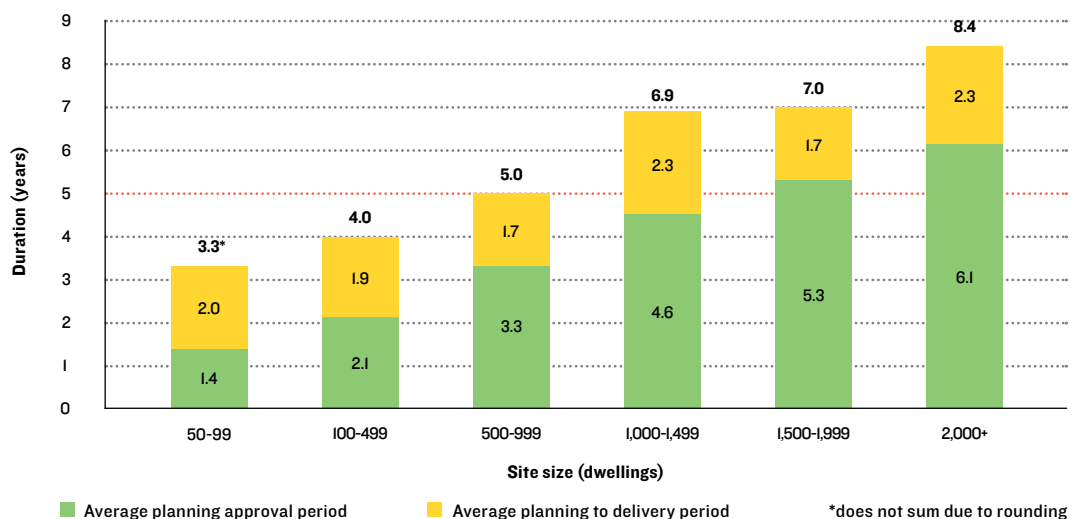
Our latest research reveals little difference between the average planning approval period by site size compared to the same analysis in the first edition (see Table 1). However, it is important to remember that these are average figures which come from a selection of large sites. There are significant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

Table 1: Average planning approval period by size of site (years)

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

Source: Lichfields analysis

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



Source: Lichfields analysis

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

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

Planning to Delivery Period

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

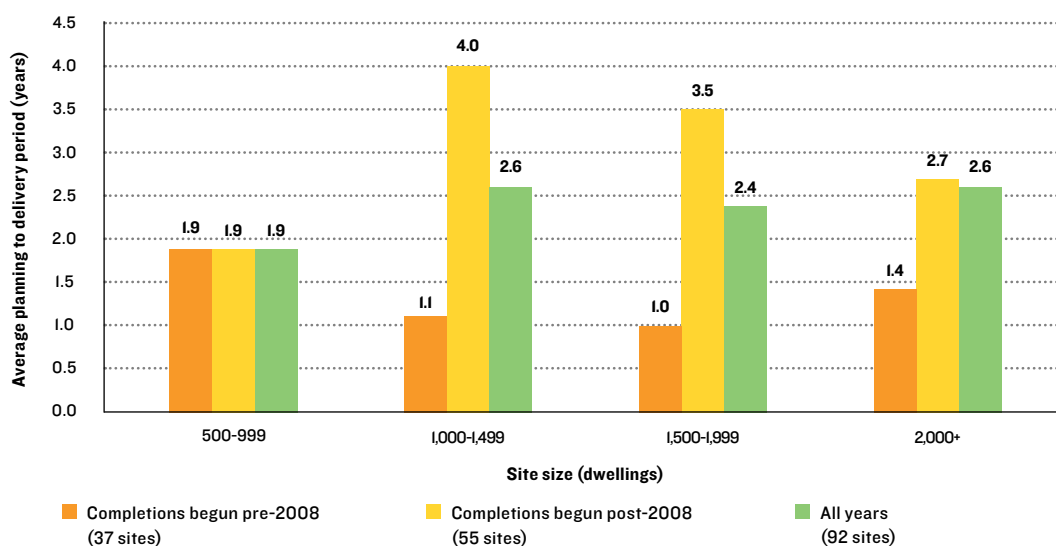
This is likely due to the inclusion of more recent proposed developments in this edition. Of the 27 new sites considered, 17 (63%) completed their first dwelling during or after 2012; this compares to just 14 (20%) out of 70 sites in the first edition of this research (albeit at the time of publication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

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



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

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



Source: Lichfields analysis

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

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

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

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

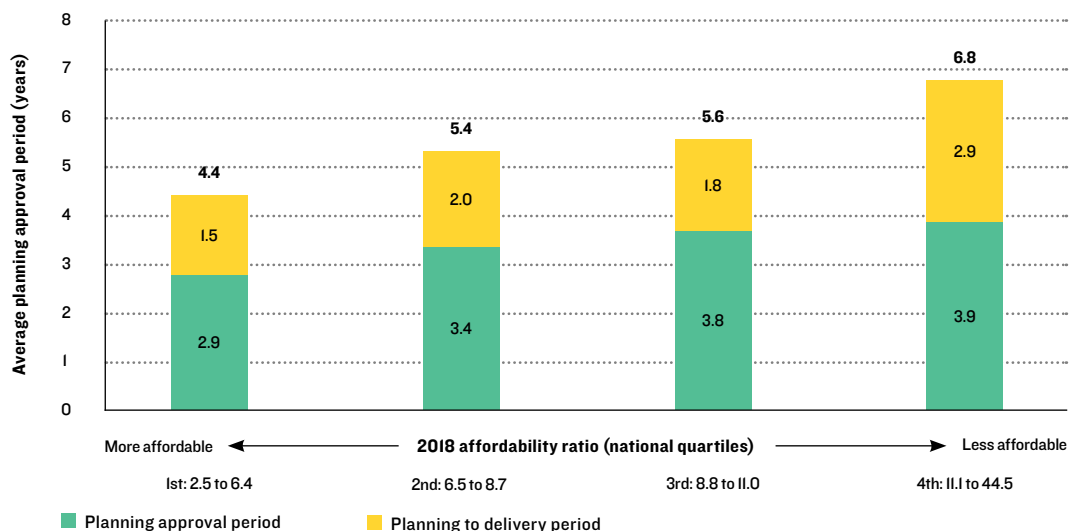
The above analysis coincides with the fact (Table 2) that sites in the most affordable locations (lowest quartile) tend to be smaller than those in less affordable locations (an average site size of c.1,150 compared to in excess of 2,000 dwellings for the three other quartiles). Even the least affordable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

Table 2: Site size by 2018 affordability ratio

Affordability ratio (workplace based)	Average site size
2.5 – 6.4	1,149
6.5 – 8.7	2,215
8.8 – 11.0	2,170
11.1 – 44.5	2,079

Source: Lichfields analysis

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



Source: Lichfields analysis

04 How quickly do sites build out?

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

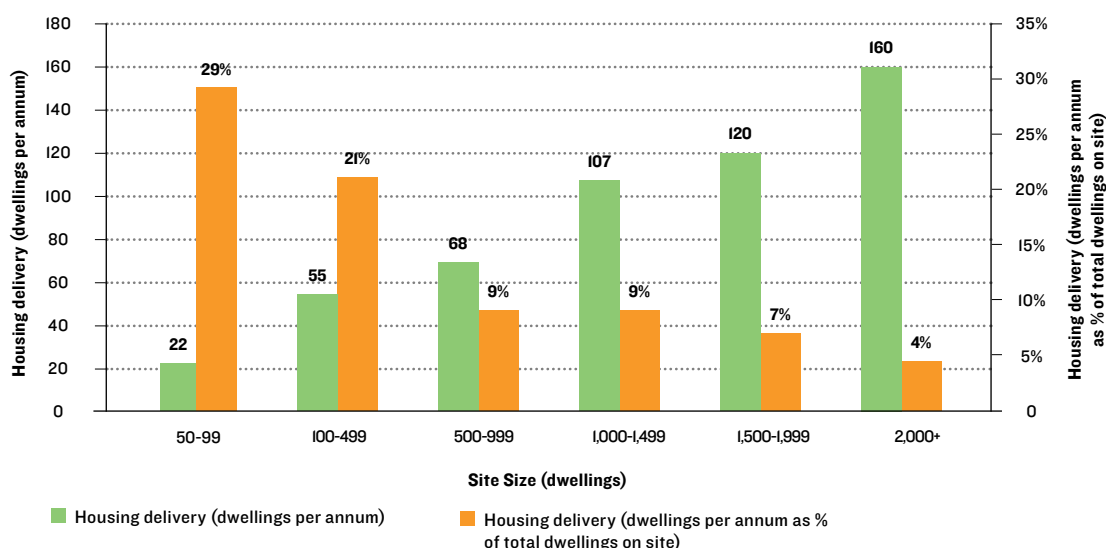
Average Annual Build-out rates

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

160 dpa

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

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



Source: Lichfields analysis

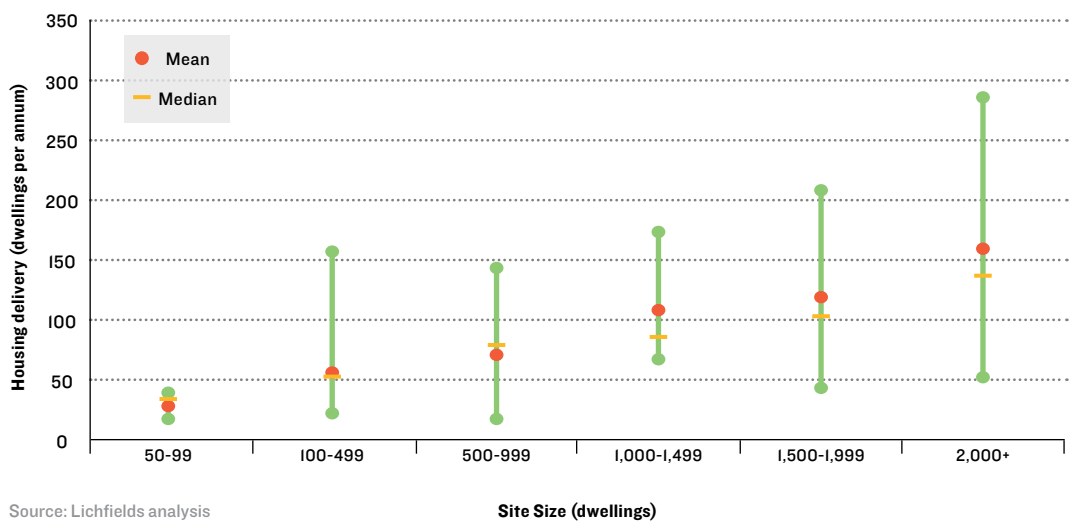


In most cases the median annual delivery rate is lower than the mean for larger sites.

We include the relevant percentage growth rates in this edition's analysis; this shows that the proportion of a site's total size that is build out each year reduces as site size increases.

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

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



Source: Lichfields analysis

Table 3: Median and mean delivery rates by site size

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

Source: Lichfields analysis

Comparison with our 2016 findings

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

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

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

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



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

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

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

Source: Lichfields analysis

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

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

Source: Lichfields analysis

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

Longer term trends

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

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

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

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

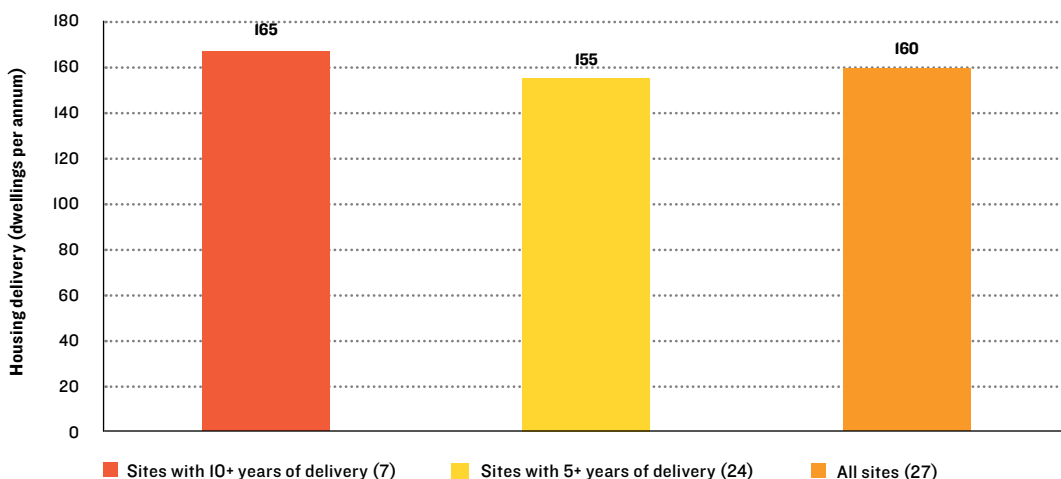
It might even relate to stages in delivery when multiple phases and therefore multiple outlets (including affordable housing) are operating at the same time. These factors are explored later in the report.

The impact of the recession on build-out rates

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

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

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



Source: Lichfields analysis

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

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

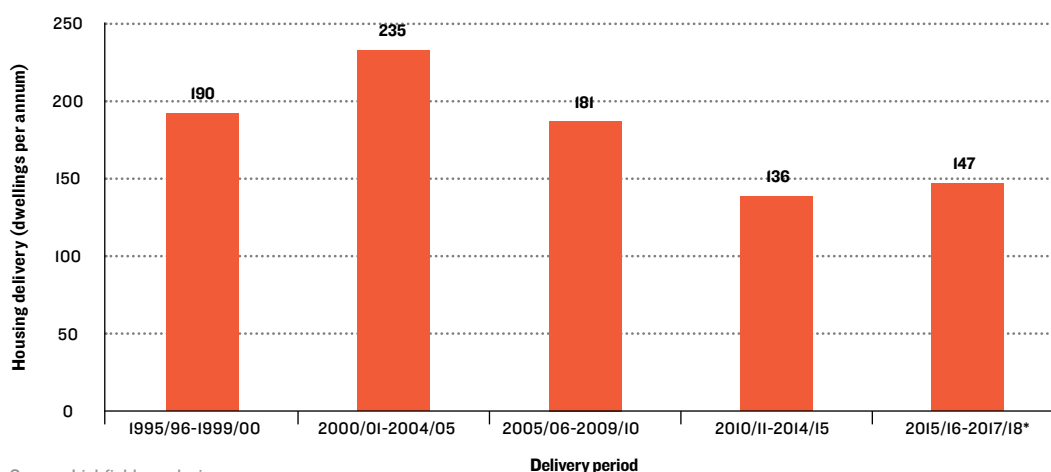
However, setting aside that stripping out the recession has a modest impact on the statistical averages for the sites in our sample, the more significant point is that – because of economic cycles - larger sites which build out over five or more years are inherently likely to coincide with a period of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

Table 6: Impact of recession on build-out rates

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

Source: Lichfields analysis

Figure 10: Average build-out rate by five year period for sites over 2,000 dwellings (dpa)



Source: Lichfields analysis

05 What factors can influence build-out rates?

+34%

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

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

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

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

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

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

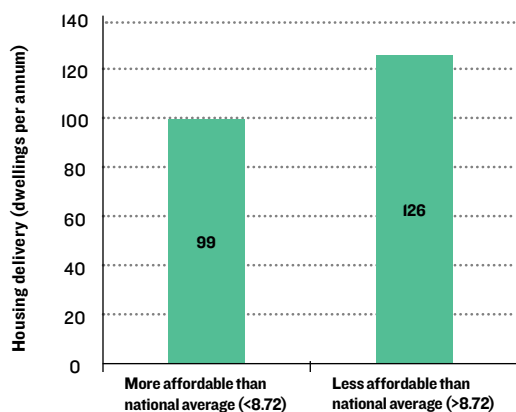
Our analysis also coincides with the fact that sites in less affordable areas are on average c.17% larger than those in more affordable areas. The average site size for schemes in areas where affordability is below the national average is 1,834 dwellings. For those delivered in areas where the affordability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

Do sites on greenfield land deliver more quickly?

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

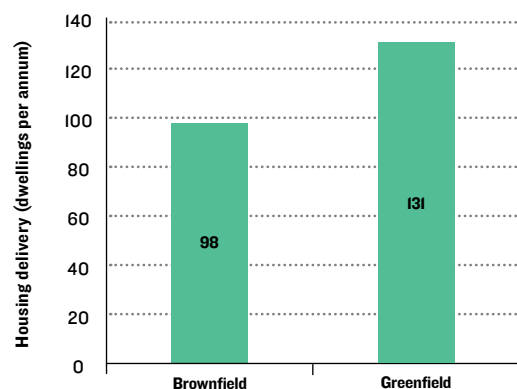
In the life cycle of a site, our data also shows that greenfield sites had shorter planning to delivery periods (2.0 years compared to 2.3 for brownfield sites), although on average, longer planning approval periods (5.1 years compared to 4.6 for brownfield sites).

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



Source: Lichfields analysis

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



Source: Lichfields analysis

Housing mix and variety

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

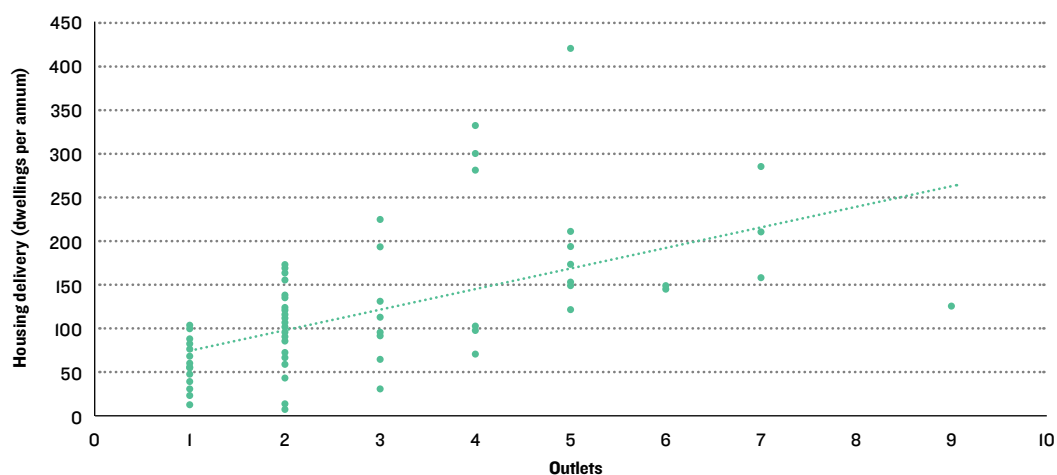
Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have used the number of sales outlets on a site as a proxy for variety of product. This gives the prospect of multiple house builders each seeking to build and sell homes for which there is demand in the face of 'competing' supply from other outlets (as revealed by the case study of Land South of the M4 in Wokingham). Letwin stated that "...it seems extraordinarily likely that the presence of more variety in these aesthetic characteristics would create more, separate markets"⁷. Clearly, it is likely that on many sites, competing builders may focus on a similar type of product, for example three or four bed family housing, but even across similar types of dwelling, there will be differences (in configuration, design, specification) that mean one product may be attractive to a purchaser in the way another might

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

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

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

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



Source: Lichfields analysis



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

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

⁸ Average completions per outlet on site with one outlet was 61dpa, dropping to 51dpa for two outlets and 45dpa for three outlets.

Geography and Site Configuration

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

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

Table 7: Parcels at Land South of M4, Wokingham

Parcel reference	Developers (active outlets)	Completions in 2017/18
SP1	Bellway (1)	59
SP2w	Bellway and Bovis (-)	None - parcel completed
SP3	Crest Nicholson (1)	47
SP4	Taylor Wimpey and David Wilson Homes (2)	140
SP9_I	Bloor, Bovis and Linden (3)	169
SPI0	Darcliffe Homes (-)	None - parcel completed
SPII	Taylor Wimpey (1)	4

Source: Lichfields analysis

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



Source: © Google Earth 2020/ Wokingham Local Plan

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

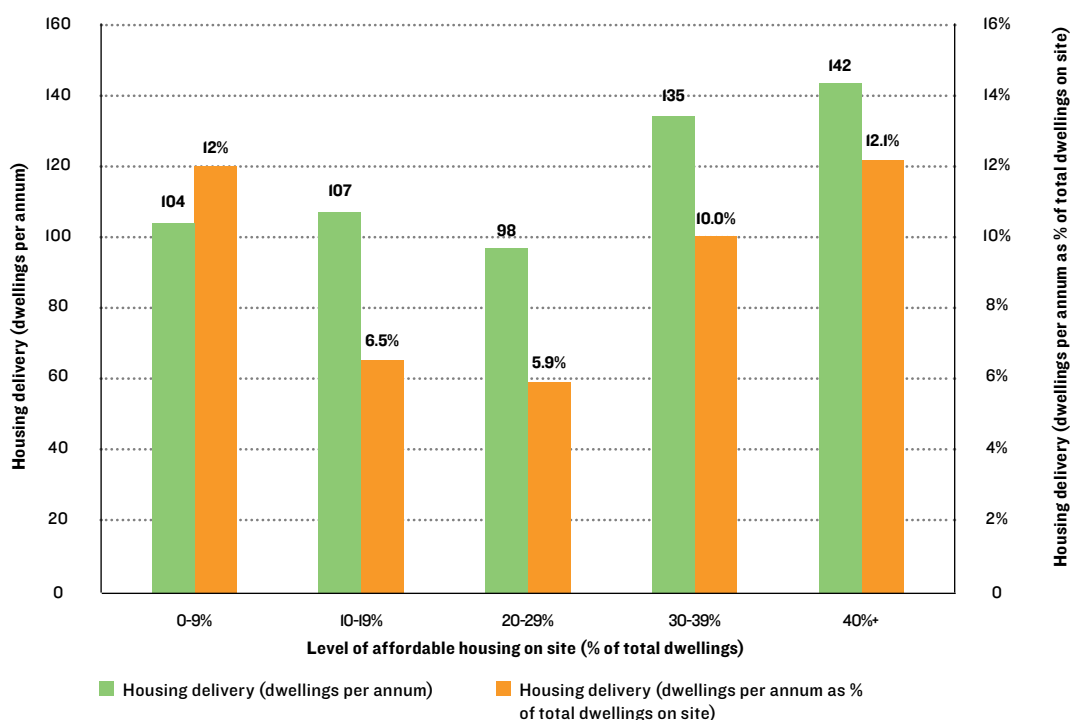
Affordable choices: do different tenures provide more demand?

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



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

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



Source: Lichfields analysis

06 Conclusions

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

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

Our research provides those in the public and private sector with a series of real-world benchmarks in this complex area of planning for large scale housing, which can be particularly

helpful in locations where there is little recent experience of such strategic developments. Whilst we present some statistical averages, the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and that these - alongside the characteristics of individual sites - need to be considered carefully by local authorities relying on large sites to deliver planned housing.

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

Key findings:

1 Large schemes can take 5+ years to start

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

2 Lead-in times jumped post-recession

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

3 Large greenfield sites deliver quicker

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

4 Outlets and tenure matter

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

Figure I6: Key questions for assessing large site build-out rates and delivery timelines



Appendices

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Appendix 1: Definitions and notes

The 'lead in'

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

The 'planning period'

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.

The 'planning to delivery period'

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

The date of the 'first housing completion'

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

The 'annual build-out rate'

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

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

Sources for sites also found in the Letwin Review

Arborfield Green (Arborfield Garrison)	Five Year Housing Land Supply Statement and appendix on Strategic Development Locations at 31st March 2018 published 9th October 2018 http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/
Ledsham Garden Village	Various Housing Land Monitor Reports https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/
Great Kneighton (Clay Farm)	Partly provided by Cambridgeshire County Council and included in numerous AMR's https://www.cambridge.gov.uk/annual-monitoring-reports
Trumpington Meadows	Included in numerous AMR's for Cambridge and South Cambridgeshire (site crosses boundaries) https://www.cambridge.gov.uk/annual-monitoring-reports and https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/
Graven Hill	Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
South West Bicester (Kingsmere Phase I)	Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
Great Western Park	Housing Land Supply Statement April 2018 http://www.southoxon.gov.uk/sites/default/files/30.04.2018%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf
Ebbsfleet:	First phase at Springhead Park and Northfleet South from Gravesham AMR's 2009/10 to 2012/13
2009-10:	127 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69823/AMR2010.pdf
2010-11:	79 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69814/AMR2011.pdf
2011-12:	55 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-2011-12-May-2013.pdf
2012-13:	50 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/92449/Gravesham-Authority-Monitoring-Report-2012-13-interim-May-2013.pdf
2013/14:	87 dwellings, based on total completions from Gravesham to 2012/13 of 311 and total completions to the start of 2014/15 in the Ebbsfleet Garden City Latest Starts and Completion Figures totalling 398.
2014/15 to 2017/18:	Ebbsfleet Garden City Latest Starts and Completion Figures: https://ebbsfleetdc.org.uk/tracking-our-performance/

Appendix 3:

Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Horfield Estate Phase I	Bristol City Council	485
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery	Wigan	471
Farington Park, east of Wheelton Lane	South Ribble	468
Bleach Green	Gateshead	456
Kingsmead South	Milton Keynes Council	450
New Central	Woking Borough Council	445
Land at former Battle Hospital	Reading Borough Council	434
New World House	Warrington	426
Radyr Sidings	Cardiff	421
Luneside West	Lancaster	403
Woolley Edge Park	Wakefield	375
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	365
Former NCB Workshops (Portland Park)	Northumberland	357
Chatham Street Car Park Complex	Reading	307
Kennet Island Phase I - H, M, T, U1, U2	Reading	303
Land at Dorian Road	Bristol, City of	300
Land at Fire Service College, London Road	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Long Marston Storage Depot Phase I	Stratford-on-Avon	284
M & G Sports Ground, Golden Yolk and Middle Farm	Tewkesbury	273
Land at Canons Marsh	Bristol, City of	272
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417	Cotswold	270
Hortham Hospital	South Gloucestershire	270

Site Name	Local Planning Authority	Size
GCHQ Oakley - Phase I	Cheltenham	262
Hewlett Packard (Land Adjacent To Romney House)	Bristol, City of	242
I28-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hoval Ltd North Gate	Newark and Sherwood	196
Notcutts Nursery, I50 - I52 London Road	Cherwell	182
Sellars Farm	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton, Milton Keynes	Milton Keynes	176
Queen Mary School	Fylde	169
London Road/ Adj. St Francis Close	East Hertfordshire	149
Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	145
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
North of Douglas Road	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	130
Land to the rear of Mount Pleasant	Cheshire West and Chester	127
Primrose Mill Site	Ribble Valley	126
Kennet Island Phase IB - E, F, O & Q	Reading	125
Land between Godsey Lane and Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Land west of Birchwood Road	Bristol, City of	119
Former Bewbush Leisure Centre Site	Crawley	112
Land south of Station Road	East Hertfordshire	111
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	96
North East Sandylands	South Lakeland	94

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

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Contacts

Speak to your local office or visit our website.

Birmingham

Jon Kirby
jon.kirby@lichfields.uk
0121 713 1530

Bristol

Andrew Cockett
andrew.cockett@lichfields.uk
0117 403 1980

Cardiff

Gareth Williams
gareth.williams@lichfields.uk
029 2043 5880

Edinburgh

Nicola Woodward
nicola.woodward@lichfields.uk
0131 285 0670

Leeds

Justin Gartland
justin.gartland@lichfields.uk
0113 397 1397

London

Matthew Spry
matthew.spry@lichfields.uk
020 7837 4477

Manchester

Simon Pemberton
simon.pemberton@lichfields.uk
0161 837 6130

Newcastle

Jonathan Wallace
jonathan.wallace@lichfields.uk
0191 261 5685

Thames Valley

Daniel Lampard
daniel.lampard@lichfields.uk
0118 334 1920

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