

Council response to GVA comments – delivery rates and site selection

1. Introduction

- 1.1 This note sets out the Council's response to GVA's Local Plan examination paper submission PHD13 – 'Delivery rates and site selection, response to additional information submitted by the Council' (GVA submission paper).
- 1.2 The response below highlights specific points raised in the GVA submission paper and responds to them individually.

2. Council response

- 2.1 Paragraph 5 of the GVA submission paper suggests that it **could** take up to 58 months for the proposed Direction for Growth sites to begin delivering dwellings.
- 2.2 The Council would highlight the following in response;
 - GVA's suggestion of timescales is founded on no substantive evidence and no local knowledge; therefore it can only be deemed an opinion at best. During the oral hearing sessions, there was a suggestion by GVA that their suggested timescales were based on Melton Borough Council's proposed strategic development location. The Melton proposal however is significantly different to this Council's Direction for Growth proposals, as its delivery includes 2,000 new homes, 20 hectares of employment land, and a major strategic link road connecting the A606 and A607. It is highlighted that for delivery of the Council's Direction for Growth proposals there is not a need for major strategic highway projects and the scales of development are considerably lower (approximately 600 on the largest site).
 - The Council's delivery timescales are based on substantive evidence, and vast expert knowledge and understanding of local housing delivery in the Borough (over 10 years each officer). As highlighted within previous Council examination submissions, two of the Direction for Growth proposals (Wigston Direction for Growth and Cottage Farm Direction for Growth) are being delivered by developers (David Wilson Homes and Bloor Homes) that are not only volume house builders, but have good experience of delivering homes locally. The evidenced used to inform the Council's housing delivery and trajectory was obtained from the developer themselves; who are best placed to know their annual delivery yield. The Stoughton Grange Direction for Growth is not to be delivered by the current applicant / land promoter, however the land promoter has significant experience of promoting land, obtaining planning permissions, and selling to the market; therefore has sufficient knowledge to foresee timescales and annual delivery yields. It should also be noted that as mentioned in the Hearing sessions there is significant developer interest in purchasing and delivering the Stoughton Grange Direction for Growth.
- 2.3 Paragraphs 8 through to 12 of the GVA submission paper suggest that none of the schemes that the Council mentioned in its submission document HD2 are comparable and cannot be used to illustrate delivery rates.
- 2.4 The Council would highlight the following in response;
 - Three of the four schemes highlighted by the Council were either greenfield or predominately greenfield in nature, therefore would have required substantial upfront infrastructure (including new site access, new drainage etc) prior to the delivery of the first

residential unit. Each of these schemes were **completed** (some considerably) within the 58 month **first** delivery timescale suggested by GVA.

- See paragraph 2.2 bullet 2 above.

2.5 Paragraphs 13 and 14 of the GVA submission paper suggest that the Council's 5 year delivery of 194 dwellings on the three Direction for Growth sites is optimistic and the developer / land promoter forecasts of 394 dwellings is wholly unrealistic.

2.6 The Council would highlight the following in response;

- Throughout the Local Plan Examination, the Council has consistently reiterated that the 5 year supply figures illustrated are extremely conservative, and should be seen as a minimum figure. This premise applies to the Council's 5 supply figure as a whole and each individual component part of the supply, for example the Direction for Growth sites delivery. The Council illustrates in its Supplementary 5 Year Supply Note (HD6) that as of the 1st April 2018 the Direction for Growth sites contribution is 194 dwellings over the 5 year period. In devising the Direction for Growth sites delivery trajectory, the Council took the developer / land promoter submitted delivery rates, allowed a full years' worth of flexibility / lag time prior to first dwelling delivery, and lowered delivery rates at both the Cottage Farm Direction for Growth and the Stoughton Grange Direction for Growth. Whilst the Council does not disagree with the developer / land promoter submitted delivery rates, it made a planning judgement (based on local knowledge and pragmatism) to produce a delivery trajectory that was very conservative and minimal, to ensure that the Council had **at least** a 5 year supply of new homes.
- The extremely conservative approach that the Council took is supported / vindicated by the developer / land promoter submitted delivery rates, which sets out the delivery of 395 dwellings on the three Direction for Growth sites over the 5 year period. It is worth reiterating that the developer / land promoter submitted delivery rates are evidenced directly by the developer / land promoter themselves and are not based on third party opinion.

2.7 Paragraphs 15 to 20 of the GVA submission paper seem to suggest similar implementation timescales should be applied to the Phases 1 and 2 of the Wigston Direction for Growth Area and the Cottage Farm Direction for Growth Area.

2.8 The Council would highlight the following in response;

- What GVA neglect to acknowledge in their submission is that the speed of delivery of Phase 2 of both Direction for Growth Areas will be significantly increased from each Phase 1, due to key infrastructure, including roads, foul drainage, water etc already being onsite. The building out of Phase 2 would flow continuously from Phase 1 development; there would be no stop / then start of delivery.

2.9 It should be noted that both the Wigston Direction for Growth Area and Cottage Farm Direction for Growth Area commenced Phase 1 a number of months ago. Both developers / land promoters are also liaising with the Council regarding their Phase 2 elements; with planning applications expected prior to the end of the this calendar year (2018).

2.10 In addition, the Council would note that the site selection methodology approach undertaken for the proposed allocation sites was done so in a robust manner, by officers who have detailed and expert knowledge of the Borough area. As the Council has already expressed, in addition to robust and justified evidence base, planning judgement plays a key role in all planning decisions and plan making processes. The matter was discussed in detail during the Local Plan Examination and therefore the Council has no additional comment to those already expressed and put forward to the Inspector.