

Oadby and Wigston Local Plan – Examination in Public

Matter 2 Issue 2 – Five Year Housing Land Supply

Supplementary Note

Introduction

1. The Inspector has asked GVA to provide further written submissions detailing our assessment of the extent to which the Council will be able to demonstrate a five-year supply of deliverable housing sites upon adoption of the Local Plan in accordance with the provisions of paragraph 47 of the NPPF. The points that follow will be discussed at an additional hearing session on 25 April at 2pm.
2. Our assessment and findings are based on the following:
 - i) the starting point is the Council's monitoring data published in the Housing Implementation Strategy and Residential Land Availability Assessments dated April 2018 (i.e. completions data for the period 1 April 2011 to 31 March 2018 and supply data for the period 1 April 2018 to 31 March 2023);
 - ii) we have assumed that the buffer (whether that is 5% or 20%) is to be added to the base requirement and the shortfall – the approach advocated by the Inspector at the Matter 2 Issue 2 session;
 - iii) we have assumed that any shortfall is made up over five years ('Sedgefield') as that is the only approach contemplated in policy and guidance. There is no contemplation in either the NPPF or the NPPG of the 'Liverpool' approach;
 - iv) we have assumed an annual housing requirement of 148 dwellings per annum (dpa). This is without prejudice to our view, as expressed at the Matter 2 Issue 1 session, that the annual requirement should (and could) be higher in order to better address the Borough's significant need for affordable housing;
 - v) we have assumed specific delivery rates for the Direction for Growth sites. These are set out below;
 - vi) we have assumed certain lead in times for the delivery of 'large sites' such as the DfGs. These are consistent with timescales promoted by Melton Borough Council at the recent Examination of its Local Plan and are agreed by Jelson, a highly experienced housebuilder with a Leicestershire track record extending over 125 years, to reflect real world timescales for major developments.
3. Given the scale of challenge presented by the housing crisis, it is absolutely critical that, in both plan-making and decision-taking, the focus is on 'delivery', i.e. what actually will be delivered in the next 5 years. In our view, if the Inspector is in any doubt whatsoever about the deliverability of the sites that the Council has included in its 5 year supply calculations, she should err on the side of caution and work with the Council to identify modifications

that can be made to the Plan in order to add greater resilience and flexibility. This, in our view, will mean allocating more sites for development.

The Five Year Requirement

Sedgefield Plus 20% Buffer

	Need Component	Calculation	Oadby and Wigston Total
a	HENDA FOAN (2011 to 31 March 2018)	7 x 148	1,036
b	Total completions (2011-2018)	-	685
c	Shortfall	(a) – (b)	351
d	Base requirement (2017-2022)	148 x 5	740
e	Buffer (20%)	(c) + (d) x 0.2	219
f	Five year requirement	(c) + (d) + (e)	1,310
g	Requirement annualised	(f) / 5	262

Sedgefield Plus 5% Buffer

	Need Component	Calculation	Oadby and Wigston Total
a	HENDA FOAN (2011 to 31 March 2018)	7 x 148	1,036
b	Total completions (2011-2018)	-	685
c	Shortfall	(a) – (b)	351
d	Base requirement (2017-2022)	148 x 5	740
e	Buffer (5%)	(c) + (d) x 0.05	55
f	Five year requirement	(c) + (d) + (e)	1,146
g	Requirement annualised	(f) / 5	229

Available Supply

Council's Position on Supply (Housing Implementation Strategy 2018)

Category	Scenario 2
Commitments	819
SHLAA sites (and small allocations)	171
Town Centre Allocations	154
Wigston Direction for Growth Phase 1	-
Proposed Direction for Growth Sites (Wigston DfG Phase 2 / Stoughton Grange/ Cottage Farm)	194
Windfall	70
Total	1,408

GVA Commentary

Commitments

4. David Wilson Homes has submitted a Statement of Common Ground advising that it expects to deliver 450 dwellings on the Wigston DfG Phase 1 site, and that it will be delivered by both the DWH and Barratt brands.
5. 87 of the dwellings in the 'commitments' line are to be delivered on 'small sites' (i.e. those of 10 dwellings or less). In our experience, small sites such as this are a notoriously unreliable source of supply and, as a consequence, local planning authorities (whether it be in the plan-making or decision-taking context) regularly apply a non-implementation discount to the small site supply figure. In our view, such a discount should be applied in this instance and we consider a 10% adjustment to be reasonable. This removes 9 dwellings from the commitments line.

SHLAA Sites and Small Allocations

6. The Council quotes a figure of 171 dwellings on this line. This comprises 34 dwellings identified as deliverable in the most recent SHLAA (April 2018) and 137 dwellings to be delivered by the allocations on PUA sites in Policy 2 of the Local Plan (excluding the Meadow Hill and West of Welford Road sites, as these are now included in the commitments line).
7. Those sites identified in the SHLAA are ones which do not benefit from a policy allocation. In other words, they are windfalls, an allowance for which has already been made by the Council. These 34 dwellings have therefore been double counted and should be removed.
8. GVA comments on the deliverability of the Policy 2 Allocation Sites as follows.

Site Name	Issues	Deliverable (Y/N)	Number of Dwellings Expected by Council	Number of Dwellings Anticipated GVA
Nautical William, Aylestone Lane	Council has refused planning permission for residential development and therefore determined that the site is not suitable for residential development. No evidence that the site is demonstrably available.	No	29	0
39 Long Street	Loss of existing building on-site resisted by Council when refusing previous application. Second application remains undetermined. The site is not demonstrably suitable for residential development. No evidence that the site is demonstrably available.	No	18	0
53 – 59 Queen’s Drive	Despite a resolution to grant from November 2016, a S.106 agreement has not yet been signed. The site is not demonstrably achievable. There is no evidence that it is available.	No	15	0
Oadby Pool	Not controlled by promoter/developer. No evidence of active marketing. No evidence of planning application. Therefore, no evidence that the site is suitable, available or achievable.	No	32	0
Arriva Bus Depot	Local Development Order in place but further approvals and remediation almost certainly required. The site is still operational. No evidence that the site is available or achievable.	No	43	0
Total			137	0

Proposed Direction for Growth Sites

9. As indicated above, we have made certain assumptions about the time it takes land owners and developers to deliver housing on large sites such as the DfGs. These are set out below. As mentioned during the Matter 2 Issue 2 session, similar assumptions were made by Melton Borough Council for the purposes of examining its Local Plan earlier this year, although Melton Borough omitted certain key stages in the development process which we have added in (the italicised text).
10. In our experience and that of our Client, these are fair and reasonable assumptions that reflect reality. Bringing major developments forward, and converting an initial proposal into dwellings on the ground, is a hugely challenging, complex and time-consuming business.

This is illustrated quite helpfully by the Statement of Common Ground between the Council and David Wilson Homes / Barratt which confirms that it will have taken well over 7 years to deliver dwellings on the Wigston DfG (since confirmation of the allocation – not since first contemplation). Of course, some schemes will progress more quickly than we set out below but some (possibly even most) will take longer. The timescales that we have assumed are as follows:

- prepare / submit outline planning application and obtain positive resolution – 12 months
 - negotiation / settlement of S.106 (post-resolution to grant) – 6 months
 - *negotiation / completion of sale of site to a developer – 9 months* (NB Wigston DfG Phase 2 and Cottage Farm Phase 2 are already controlled by housebuilders, so this stage does not apply to those sites)
 - preparation / submission / approval of Reserved Matters – 12 months
 - *discharge of conditions / obtaining technical approvals (e.g. roads and sewers) – 9 months*
 - site preparation / commencement of construction – 10 months
11. Based on the above timeline, our judgement is that it can take 58 months before large sites can begin to deliver new houses (or 49 months if already controlled by a housebuilder). That would mean there would only be 2 months available for new dwellings to be completed (or 11 months where a site is already controlled by a housebuilder at outline stage) in the 5 year period under consideration here. That means only a very few dwellings are likely to be completed on the large sites in the five year period.

Wigston Phase 2 DfG

12. Pegasus asserts in its Statement of Common Ground, on behalf of DWH, that the Wigston Phase 2 DfG will deliver 175 dwellings within the five year period (74 in year 4 and 101 in year 5). We consider this to be highly optimistic. The tables in the SoG make no allowance for the negotiation of the S106 (12 months for preparation, submission and obtaining outline planning permission is unrealistic for a 600 unit scheme) and the time table makes no allowance for technical approvals which DWH will know can take anything from 6 months to 18 months (and longer in some cases). In our view, the trajectories shown in Tables 2 and 3 should each be pushed back by 12 months, reducing the forecasts for that site by 101 (or 151 in the alternative scenario presented Pegasus' Table 3).

Cottage Farm Phase 2 DfG

13. Cottage Farm Phase 2 DfG is controlled by a single housebuilder (Bloor Homes). Delivery by a single developer will not be at the same rate as a site being delivered by two developers. In our experience, a site controlled by a single developer might deliver at a rate of 50 dpa. That equates to circa 4.2 dwellings per month, or circa 46 dwellings in the period between month 49 and month 60.

Stoughton Grange DfG

14. Stoughton Grange DfG is not controlled by a housebuilder and so, on the basis of our timeline above, it will take 58 months before it begins to deliver dwellings. Again assuming a build rate of 50 dpa by a single developer, the site could deliver circa 8 dwellings in the period between month 58 and month 60.
15. On this basis, we anticipate delivery on the DfGs over the five year period to be in the order of the following.

Year	Number of Dwellings		
	Stoughton Grange	Wigston Phase 2	Cottage Farm Phase 2
2018/19	0	0	0
2019/20	0	0	0
2020/21	0	0	0
2021/22	0	0	0
2022/23	8	74	46

16. In total, we anticipate some 128 dwellings might be capable of being delivered on the proposed DfGs, rather than the 194 anticipated by the Council.

Summary of Supply

17. In the light of the foregoing, we anticipate that the number of deliverable dwellings over the five year period might actually be as follows

	Component	Allowance Made by Council	Allowance Made by GVA
a	Commitments	819	810
b	Smaller Allocations and SHLAA Sites	171	0
c	Town Centre Allocations	154	154
d	Proposed Direction for Growth Sites	194	128
e	Windfall Allowance	70	70
Total (a+b+c+de)		1,408	1,162

18. Feeding this supply data into the five year requirements gives the following results:

GVA Supply A (Sedgefield + 20%)

	Component	Calculation	Total
a	Five Year Requirement (base + shortfall + buffer) (2017-2022)	740+351+219	1,310
b	Requirement annualised	(a) / 5	262
c	Available Supply	-	1,162
d	Supply in Years	(c) / (b)	4.43

GVA Supply B (Sedgefield + 5%)

	Component	Calculation	Total
a	Five Year Requirement (base + shortfall + buffer) (2017-2022)	740+351+55	1,146
b	Requirement annualised	(a) / 5	229
c	Available Supply	-	1,162
d	Supply in Years	(c) / (b)	5.0