EXD53

South Hams District Council

West Devon Borough Council

PLYMOUTH CITY COUNCIL

JLP Councils details and examples of past interventions which have affected the time and scale of housing delivery and how it could work in future if there is a reduction in the amount of housing being built per annum

16 March 2018

Strategic Interventions

1. The City Council is able to demonstrate a number of strategic interventions that have affected the time and scale of housing delivery to respond to housing market conditions and failure, along with our plans for future interventions.

Market Recovery Action Plan 2008 and Scheme 2009 – CS3 appendix F

2. Launched in October 2008 with the aim of maintaining optimism and momentum in response to the economic downturn and housing market collapse post 2008 recession. This included measures to support and safeguard the delivery of projects including development tariff discounts, reduction of the full affordable housing requirement and promote oven ready consents that would be ready for implementation when market and economic confidence returned.

3. Achievements include 115 planning permissions approving 1,845 dwellings. As at August 2013 51% of the planning approvals under the scheme had been completed or were under construction delivering 725 new homes.

Get Plymouth Building 2012 – SC3 appendix G

4. Launched in August 2012 containing 8 initiatives, with the aim of accelerating the delivery of greener and more affordable homes, and bring-forward around 2000 homes over 3 years. This including reviewing

all stalled and lapsed sites and tackling and removing the barriers to delivery, a call for sites, exploring new delivery and funding models and to bring forward 10 city council owned sites for new housing.

5. Achievements include the delivery of 2,184 homes over a 3 year period.

Plan for Homes 2013 and refreshed 2016 – SC3 appendix H

6. Launched in November 2013, an £80m cross-party commitment to increase and further accelerate housing supply with the ambition to deliver 5000 new homes (gross) over five years. A framework for proactive and positive planning and housing delivery containing 16 initiatives to enable a step change in delivery to address a range of identified housing needs. This includes measures to provide finance, land, infrastructure, community engagement and leadership to plan and deliver new and affordable homes.

7. The centerpiece of the Plan for Homes was the streamlined and targeted approach to land releases, supported by a ‘one team’ approach, demonstrating accelerating and increasing housing delivery on the ground through City Council support and intervention;

8. The release of 33 council owned sites for housing in 18 months, with delivery partners agreed and contracts exchanged, totaling 138 acres of land. These sites are planned to deliver 1,650 new homes (gross) of which 840 are affordable (51%).

9. Driving delivery of the sites released for housing, to date 13 sites have completed (370 homes) and 13 sites are under construction (669 homes).

10. Delivery is aimed at meeting a wide range of needs across the city including; Extra Care housing for older people and people with learning disability, a flagship service veterans self build project, larger family homes, rent to buy models, wheelchair and accessible homes, and overall above policy levels of affordable housing. Achieving housing best value in terms of housing outcomes and deliverability rather than best consideration, maximizing the capital receipt, from our land. .

11. Analysis of the lead in times on these 26 sites from the date the developer was appointed to start on site is 24.3 months. If we remove the two outlier sites where significant and extraordinary delays are documented, the lead in time on the remaining 24 sites reduces to 22 months. Evidencing our ability to improve the speed and scale of housing delivery. See **Table One**: Plan for Homes Sites: Lead in timeframe from developer appointed to start on site (**Appendix 1**).

12. Working with Homes England to bring forward third party sites for new homes and regeneration. This includes PCC acquisition of three sites at Colin Campbell Court Policy PLY7) at pre-application stage, Bath Street West (Policy PLY30) at pre-application stage and Prince Maurice Road, planning application submitted, to deliver over 400 new homes under the Starter Homes Land Fund.

13. Pioneering 27 starter homes on a council owned site at the former Whitleigh Community Centre (Policy PLY59.17), completion of infrastructure works, through the Starter Homes Local Authority Funding Programme.

14. Supporting Homes England acquisition of Coypool (Policy PLY53) to accelerate the delivery of in the order of 400 new homes; formal pre-application process with the City Council and develop a Strategic Master Plan for the entire site in Spring/Summer 2018, submit a planning application early in 2019 and commence development by 2020. It should be noted that this is an accelerated timescale compared to that assumed in the JLP Councils' trajectory for the PPA.

15. Successful funding bids to support delivery including Accelerated Construction Funding, Housing Infrastructure Funding, Land Release Funding and Affordable Housing Programmes.

16. Continuing the estate regeneration of priority neighborhoods: completing Devonport (1,500 new homes / 600 demolitions); maintaining momentum at North Prospect Policy PLY58.5 & Policy PLY58.6 (1,100 new homes / 798 demolitions); master planning at Barne Barton (Policy PLY58.15) (226 obsolete flats).

17. Developed a pipeline of 156 self and custom-build units on City Council sites to include serviced and non-serviced plots, developer and community led schemes.

18. Launched an Empty Homes Financial Assistance Policy in January 2017, supported by a capital fund of £1m, to provide loans and grants to help bring empty homes back into occupation; since May 2016, 82 long term empty homes have been brought back into use through Housing Delivery Team intervention.

Homes for Plymouth 2018 – New 10 year Programme

19. To build on the success of our earlier interventions and to ensure a pipeline of delivery going forward the Council have launched Homes for Plymouth.

20. Announced 23rd February 2018, a new £140m housing investment programme over 10 years of further Council action and intervention in the housing market to directly deliver new homes to support delivery of sites in JLP.

21. This will provide grant and loans to acquire land for housing, prepare sites for development, provide infrastructure to help unblock sites and grants to housing providers to deliver increased housing choices.

22. The Council is already currently exploring the acquisition of a number of sites to develop a pipeline of development across the city with the potential to accelerate the delivery of over 400 homes.

23. There will be a variety of interventions required to acquire, provide infrastructure, unlock and bring forward to increase and accelerate housing delivery. The availability of this grant and loan funding programme, and working with a range of delivery partners will make that happen.

Analysis of lead in times

24. As above, analysis of the lead in times on the 26 Plan for Homes sites from the date the developer was appointed to start on site is 24.3 months. Removing the two outlier sites. Where significant and extraordinary delays are documented, the lead in time on the remaining 24 sites reduces to 22 months.

25. A recent National study carried out by Nathaniel Lichfield and Partners (see attached) suggests that the average timeframe from validation of a planning application through to determination, signing of s106 and delivery of first dwellings is in the region of 2.75 years for sites up to 99 dwellings and over 4 years for sites of 100-499 dwellings, this does not include time taken from appointment of developer to submission of the planning application.

26. For a more appropriate comparison with the Plan for homes sites (table one) see table below which compares lead in times beginning from the appointment of developer which highlights the expediency of decision making and intervention initiatives in Plymouth leading to accelerated housing delivery significantly quicker than the averages cited in the NLP research.

Table Two: Lead in times from Developer appointment to commencement/delivery of first dwelling

	Allowance for time from Developer on board to submission of planning application	Lead in time (Validation of planning application through to delivery of first dwelling	Total timeframe (developer on board to first dwelling delivery
Plan for Homes sites (Average)	22 months from developer on board to commencement of first dwellings.		22 months
SHLAA Lead in time methodology (HO2G) based on lead in times achieved all sites in PCC over 10 years period (sites between 10 and 99 dwellings	6 to 12 months* (where applicable)	7 to 15 months (28-63 weeks)	1 Year 1 month to 2 Years & 3 months
National Analysis NLP report 'Start to Finish'	6 to 12 months (Not included in analysis so assumed same as above)	2 Years 9 months approx.. (see figure 4 on page 8)	3 Years & 3 months to 3 years & 9 months

*This allowance is applied in the PPA Trajectory (TP3F) and referred to on relevant sites in trajectory agreement spreadsheet (TP3H)

27. If one looks specifically at the planning approval element of lead it times it is worth noting the comparison between NLP's research and Plymouth's record. CS3 paragraphs 3.219 to 3.220 sets out Plymouth's consent approval and performance record, which shows expediency it decision making and a high approval record.

28. In addition it is worth drawing out the comparison with Plymouth's planning approval period and the NLP research approval period. **Table three** sets out below the average time taken (months) from validation of all types of major residential applications of all sites above 10 units (smaller, medium and large sites). This compares with figure 4 of the NLP research 'Start to finish' which suggests average planning approval periods of just over 1 year for sites of 0-99 units and nearly 2 and a half years for sites of 100-499 units. In the smaller site category 0-99 dwellings Plymouth's average timescale is <u>less than 6 months</u> compared with <u>over 1 year</u> cited in the NLP research.

29. With regard to sites of 100-499 units which are more likely to have outline consents followed by reserved matters consents, the table below shows that in Plymouth's case an average timeframe of <u>1 year</u> for outline consent followed by reserved matters compares with nearly <u>2 and half years</u> cited in figure 4 of NLP's research.

Table Three: Applications determined and timescales from validation date to decision date (includes signed s106)

	Average Timescales from Date Received to Decision Date (Months)				Total Average 2013-2017
	2013/2014	**2014/2015**	**2015/2016**	**2016/2017**	
Outline Applications	7.3	5.8	7.5	5.4	6.6
Reserved Matters and Full Applications	5.3	5.7	5.7	4.8	5.3
All permissions (OUT, REM, FUL)	5.4	6.1	5.8	4.8	5.5

	Number of Applications				Total 2013-2017
	2013/2014	**2014/2015**	**2015/2016**	**2016/2017**	
Outline Applications	2	3	2	1	8
Reserved Matters and Full Applications	33	22	23	22	100
All permissions (OUT, REM, FUL)	35	25	25	23	108

Can the council identify sites outside the 5 year supply that could come forward in the event of sites identified in the 5 year supply not delivering?

PPA 5 year supply position - requirement and identified supply

30. The PPA 5 year supply position is set out in CS7 in response to matter 7.6 (v) paragraphs 7.255 and 7.256 and demonstrates that a significant amount of deliverable housing above the housing requirement has been brought forward from later in the plan period into the 5 year supply.

31. Furthermore the 5 year housing supply has not been challenged by the development industry other than to suggest that the council is perhaps being a little pessimistic about the supply identified and that additional sites could come forward earlier on delivery on sites can happen earlier.

5 year supply at the point of adoption - 2018

32. As a result of the 2017 monitoring point trajectory (TP3F) the forecast supply for the next 5 years (2018-2023) at the 2018 adoption point equals 6,409 dwellings. The 5 year housing requirement (2018-2023) equals 5,023 dwellings (i.e. 4,750 plus shortfall of 273 dwellings added to the requirement as per ‘Sedgefield’).

33. The deliverable supply identified in the 5 year supply represents a buffer of 28% (1,386 dwellings) brought forward from later in the plan period to ensure choice and competition in the market for land and provides a realistic prospect of achieving the housing requirement. The deliverable supply identified is equivalent to 6.1 years’ worth of supply when the 5% buffer is applied and 5.3 years’ worth of supply when the 20% buffer is applied.

5 year supply at the point of adoption - 2019

34. As a result of the 2017 monitoring point trajectory (TP3F) the forecast supply for the 5 years (2019-2024) at the 2019 adoption point equals 6,040 dwellings. The 5 year housing requirement (2019-2024) equals 4,668 dwellings (i.e. 4,750 minus 82 dwellings which is the residual surplus for the 5 years).

35. The deliverable supply identified in the 5 year supply represents a buffer of 29% (1,372 dwellings) brought forward from later in the plan period to ensure choice and competition in the market for land and provides a realistic prospect of achieving the housing requirement. The deliverable supply identified is equivalent to 6.2 years’ worth of supply when the 5% buffer is applied and 5.4 years’ worth of supply when the 20% buffer is applied.

Sites identified in the 5 year supply that could increase delivery

36. There are a number of sites contained within the 5 year supply where developers/promoters have indicated delivery could occur earlier or where delivery rates have the potential to increase. TP3H identifies such sites where it developers/promoters indicate the potential for earlier delivery.

37. The Council is being cautious with regard to these sites coming forward/delivering earlier then envisaged when considering the trajectory as a whole. Should some sites in the 5 year supply not occur as envisaged then there is a realistic prospect that sites identified to deliver dwellings later in years 6 and 7 could come forward earlier or the delivery rates on existing sites have the ability to increase.

38. Sites identified in TP3H where promoters/developers envisage earlier delivery or where delivery rates have the potential to increase include:

- PLY 7 Colin Campbell Court,
- PLY31 Bath Street East,
- PLY46.8 land at Tamerton Foliot Road,
- PLY50 Saltram Meadow,
- PLY53 Former China Clay dryer complex, Coypool,
- PLY58.4 Tamar Valley School, Barne Barton,
- PLY58/17 Seventrees,
- PLY59.12 Fields to North of St.Budeaux Junction
- PLY48 Sherford
- PLY52 Land at West Park Hill
- PLY44 Woolwell

Large site Windfalls

39. No allowance is made for large site windfalls. CS7 paragraph 7.245 & appendix 7 provides evidence of past windfalls in the city. Such sites add to the supply and it is reasonable to suggest that this will continue will occur for example a further 129 dwellings have been granted consent over the period April 2017 to January 2018 on sites not identified in the JLP housing trajectory.

Housing Implementation Strategy / Governance

40. Finally, in the JLP Councils' Matter Statement 3 we have explained in some detail how we envisage the Housing Implementation Strategy set out in para 3.32 of the JLP will bring forward additional initiatives that the Councils would take in the event that housing delivery does not come forward as expected. Clearly, the Councils have a track record of devising

innovative solutions using Government tools and funding to bring delivery forwards, and we will continue to innovate further solutions. Ultimately, the revised Governance Topic Paper (TP6 (rev)) sets out the process the JLP Councils will follow in the event the delivery slows down to the extent that 5 year land supplies cannot be demonstrated in either of both Policy Areas. The paper sets out that if actions to increase delivery do not yield results, the JLP Councils would trigger a review of the plan.

Appendix 1: Table One: Plan for Homes Sites: Lead in timeframe from developer appointed to start on site.

Sites	Developer Appointed	Number of homes	Site sold	Date start on site	Developer appointed to start site
Phase One					
Aster Centre	25.2.13	12 (100% affordable)	23.1.14	Feb 2014	**12 months**
Plym View	21.2.13	50 (46% affordable)	7.2.14	April 2014	**14 months**
PLUSS Building	1.3.13	19 (100% affordable)	28.2.14	July 2014	**16 months**
Ernesettle Extra Care	30.1.13	40 (100% affordable)	20.12.13	Dec 2014	**23 months**
Mannamead Centre	22.2.13	29 (43% affordable)	22.12.14	Jan 2018	**59 months***
West Park	16.10.13	32 self build	16.12.15	Nov 2016	**37 months**
Tamerton Vale	25.2.13	92 (35% affordable)	8.2.16	March 2016	**36 months**
Southway Primary	16.4.15	80 (100% affordable)	23.3.17	June 2017	**26 months**
Chaucer Way	20.11.13	137 (37% affordable)	22.8.16	Sept 2017	**46 months****
Woodlands / Hillside	21.5.14	72 (100% affordable)	25.8.16	Nov 2016	**27 months**
Phase Two					
Dover Road	4.8.14	14 (100% affordable)	8.7.15	July 2015	**11 months**
Estover Primary	15.4.14	69 (30% affordable)	4.3.16	April 2016	**24 months**
Downham School	22.5.14	28 (43% affordable)	16.12.16	April 2017	**24 months**
Tamar Way	24.1.16	13 (100% affordable)	17.10.16	Nov 2016	**10 months**
SHIP Hostel	18.12.14	11 market	12.5.17	Sept 2017	**32 months**
Yardley Gardens	9.9.14	6 (100% affordable)	8.7.15	July 2015	**10 months**
Southway Campus	8.4.14	67 (100% affordable)	1.7.16	July 2016	**27 months**
PhaseThree					
Redwood Drive	8.12.14	190 (30% affordable)	21.12.16	Feb 2017	**25 months**
Langley	4.12.14	14 (100%	7.10.16	Jan 2017	**22 months**

Sites	Developer Appointed	Number of homes	Site sold	Date start on site	Developer appointed to start site
Crescent		affordable)			
Lakeside Res Home	4.8.14	15 (100% affordable)	14.2.17	March 2017	**30 months**
Phase Four					
How Street	6.2.17	12 (100% affordable)		March 2018	**12 months**
Shirburn	6.3.15	2 self build plots	28.10.15	Feb 2016	**11 months**
Woodway	6.3.15	1 self build plots	25.8.16	Sept 2016	**18 months**
Other					
Frank Cowl House	30.09.14	11 (100% affordable)	11.3.16	March 2016	**18 months**
Nelson Project	10.1.13	24 (100% affordable	23.3.16	March 2016	**37 months**
Pier Street Car Park	6.7.15	14 (inc. GP surgery)	30.3.17	Sept 2017	**26 months**
Average lead in time (26 sites)					**24.3 months**
Average lead in time (24 sites)					**22 months**

* Delay due to new delivery and funding model

** Delay due to site conditions (asbestos contamination) and delivery partner Spectrum Housing merger with Sovereign Housing