

## Technical Note

---

**Our ref** 65191/01/MS/HBe  
**Date** 31 May 2024  
**From** Wates Developments Ltd

### Subject **Canterbury Local Plan 2040 (Reg.18): Housing Supply**

---

This technical note supports representations prepared on behalf of Wates Developments Ltd ('Wates') who have a land interest at 'Land South of Bekesbourne Lane.'

#### **Executive Summary**

In total, the Council identifies a supply of 26,467 homes will be delivered within the plan period (2020/21 to 2040/41); equating to a surplus of 2,338 homes (+9.7%) against the Council's proposed housing requirement as set out in draft Policy SS3. In terms of the Council's 5YHLS, it acknowledges the plan can – at present – only demonstrate a 4.40-year supply.

Reviewing the Council's supply (also taking account of our amends to the overall housing requirements and plan-period – as per our wider representations) the Council's 5YHLS shortfall is more severe than stated and that in total there will not be sufficient flexibility across the plan period (be it the 21-year proposed plan period, or our extended 22-year period).

Firstly, the Council use the 'Liverpool' method of dealing with its shortfall to calculate its land supply. However, the PPG endorses the 'Sedgefield' method, meaning the current position would fall to 3.75 years. In addition, applying our updated housing requirements (of 1,170 homes per year – see our supporting 'Housing Need and Requirements Technical Note') the position would fall further to 3.66 years. The Council therefore need to allocate additional housing sites to ensure a 5YHLS can be demonstrated at the point of adoption.

In respect of the overall supply, we have reviewed the delivery trajectory of two sites: C6 and C12. We conclude that the lead-in times for both sites are overly optimistic and that combined they may deliver 1,430 homes fewer than currently expected. Accounting for this supply reduction and the increase to the requirement, the Council will only have a 1.9% buffer over the proposed plan-period. This turns to a 0.8% shortfall across our extended 22-year plan-period.

To ensure that the plan has sufficient flexibility, it should plan for more than a 10% headroom. Even then to simply reinstate a 10% headroom (as was originally proposed in the draft plan) would mean allocating an additional 1,990 to 2,787 homes (in either the proposed or the extended plan-period).

## **1.0 Introduction**

- 1.1 This Technical Paper has been prepared by Lichfields on behalf of Wates Developments Ltd to support its representations to the Reg.18 consultation on the Canterbury Draft Local Plan

2040 (April 2024). It supports the main representations and should be read in conjunction with them.

- 1.2 This paper addresses the housing supply identified to be coming forward in the proposed plan period of the emerging plan period (to 2040/41).

## **2.0 National Policy and Guidance**

### **National Planning Policy Framework (Dec 2023)**

- 2.1 The NPPF requires strategic policies to set out a trajectory of housing delivery across the plan period (Para 75). It also requires that all plans should consider setting out the rate of delivery for specific sites in said trajectory.
- 2.2 Trajectories of housing delivery aid a plan in meeting the tests of ‘soundness’ (defined at Para 35); insofar as trajectories help to demonstrate that the Plan is effective and that Plan’s housing requirement will be delivered over the plan period from deliverable sites, developable sites, and from broad locations. It also helps underpin the Plan’s strategy to meet needs (i.e. that a Plan is positively prepared).
- 2.3 In addition to the above, the NPPF states:
- *“Strategic policies should look ahead over a minimum 15 year period from adoption”. This forms the minimum ‘plan period’ over which the trajectory must detail expected housing delivery.*
  - *“Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...” (Para 23); and*
  - *Planning policies need to identify a sufficient supply of “specific, deliverable sites for five years following the intended date of adoption” and “specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the remaining plan period” (Para 69).*
- 2.4 The NPPF also provides definitions for the two key categories of specific sites related to when sites will deliver within the plan-period: i.e. ‘deliverable’ and ‘developable’ (see Annex 2, NPPF). There is further guidance relevant to preparing a trajectory within the Planning Practice Guidance accompanying the NPPF. This includes further guidance on the relevant tests of ‘deliverable’ (i.e. supply in the first five-years of the trajectory) and ‘developable’ (i.e. supply from year six onwards) in the ‘Housing Supply and Delivery’ section.

## 3.0 Canterbury: Supply of Homes

### Canterbury Draft Local Plan (2040)

- 3.1 Policy SS3 (Development Strategy for the District) sets out that across the plan-period (2020/21 to 2040/41) provision is to be made through the granting of planning permissions and allocating sites to deliver, inter alia, an average of 1,149 new homes per year. The plan details a number of site allocations, but there is no policy identifying the total number of homes allocated within the current Reg.18 plan. Nor is a trajectory of expected site delivery provided (as per NPPF para 75). This detail is currently contained within the supporting ‘Development Topic Paper’ (2024).

### Development Topic Paper (2024)

- 3.2 The supporting ‘Development Topic Paper’ (2024) sets out key housing information related to the emerging plan including: (1) five-year housing land supply (‘5YHLS’) position; and (2) the overall supply expected to be delivered within the plan period.

#### 1. Five-year supply

- 3.3 Table 8.9 sets out the topic paper sets out the Council’s calculation of its current 5YHLS position using the ‘Liverpool’ method of dealing with the shortfall (see paras 8.1 to 8.6). Using this method, the Council identifies that it would currently only be able to demonstrate a 4.40-year supply (i.e. below five-years’ worth as required by NPPF para 69).

Table 1 Council’s Calculated 5YHLS Position

5YHLS (2023/24 to 2027/28)	Homes
Residual Requirement (Per Annum)	1,232
Five Year Residual Requirement	6,160
Buffer	20%
Total Five Year Requirement	7,392
Total Supply (Council)	6,508
5YHLS	4.40 Years
Shortfall / Surplus	-844

Source: Table 8.9, Development Topic Paper (2024)

#### 2. Total plan-period supply

- 3.4 In total, the Council identifies a supply of 26,467 homes will be delivered within the plan period (2020/21 to 2040/41); equating to a surplus of 2,338 homes (+9.7%) against the Council’s proposed housing requirement within draft Policy SS3.

Table 2 Total Identified Supply in Plan Period Compared to Identified Requirement

Supply (2020/21 – 2040/41)	No. Homes
Identified Housing Requirements (Policy SS3)	24,129
Total Supply (Delivery and Expected Supply)	26,467
Shortfall / Surplus	+2,338 (+9.7%)

Source: Lichfields Analysis of 'Development Topic Paper' (2024)

- 3.5 This total figure includes homes already built in the current plan-period. According to the Council's own figures (as per Table 8.1 in the Development Topic Paper [2024]) a total of 1,952 homes has been delivered in the new plan-period between 2020/21 to 2022/23. By comparison, the Government's own 'net additional dwellings' data shows that 1,655 homes in the same period. While differences are not uncommon between the two figures, the Council should clarify this significant 297 home discrepancy.

Table 3 Delivery Within Current Plan-Period

Delivery	2020/21	2021/22	2022/23	Total
No. Homes (Council)	474	785	693	1,952
Net Additional Dwellings (DLUHC)	319	692	644	1,655

Source: Table 8.1, Development Topic Paper (2024). Table 122, DLUHC (latest release published November 2023)

- 3.6 The remaining supply of 24,515 homes is expected to be delivered on a range of sites between 2023/24 to 2040/41. This is primarily from carried forward allocations (47%), draft new housing allocations (33%) and expected windfall development (10%).

Table 4 Total Supply from 2023/24 to 2040/41

	No. Homes	% of Total
2017 Carried Forward Allocations	11,461	47%
Draft New Allocations	8,073	33%
Planning Permissions	1,161	5%
Windfall	2,429	10%
Student Permissions	594	2%
Older Persons Permissions	366	1%
Draft New Allocations for Older Persons Homes	431	2%
<b>Total</b>	<b>24,515</b>	<b>~</b>

Source: Table 8.8, 'Development Topic Paper' (2024)

3.7 In relation to the supply, the Development Topic Paper (2024) details:

- **Overall and site-by-site trajectories:** Table 8.8 details a combined trajectory for each source of supply expected to be delivered across the remaining plan-period. In addition, Appendix D details a trajectory of extant planning permissions, care homes permissions, and student accommodation permissions; Appendix F details a trajectory of carried forward allocations; and Appendix G details trajectory of new allocations and new older persons housing allocations.
- **Site deliverability evidence:** The topic paper includes a range of evidence supporting the sites within the plan. Appendix E includes Statements of Common Ground ('SoCGs') regarding carried forward 2017 Local Plan Allocations. This source of supply is also backed up with site summaries (paras 8.57 to 8.113). Evidence has also been prepared to support the new allocations which is summarised in Table 8.7.

There is also reference to the Council's latest 'Phasing Methodology' (2023) report. This sets out the Council's assumptions on lead-in times and build-out rates.

## 4.0 Review of Canterbury's Supply Position

### 1. Five-year housing land supply

4.1 As a starting point, the Council admits that it the draft plan currently is unable to demonstrate a 5YHLS. This is based on the proposed housing requirement and supply (at 4.40 years). However, this figure is calculated using the 'Liverpool' method of dealing with the shortfall of homes that has accrued during the plan-period to date.

4.2 In considering the shortfall of homes, the PPG (ID: 68-031) is clear that any deficit or shortfall within the plan-period needs to be calculated from the base date and then added to the next five-year period (i.e. the Sedgefield method). It then goes on to state that:

*“If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.”*

- 4.3 Table 5 and Table 6 below shows the effect of using the Sedgfield method of dealing with the shortfall using two different requirements: (1) the proposed housing requirement as per Policy SS3; and (2) the latest uncapped standard method figure of 1,170 homes per year. In these scenarios, the Council would only be able to demonstrate between a 3.66-to-3.75-year supply.

Table 5 Lichfields Amended 5YHLS (Using Sedgfield)

5YHLS (2023/24 to 2027/28)	Homes
Annual Requirement (Policy SS3)	1,149
Five Year Requirement	5,745
Shortfall (from 2020/21 to 2022/23)	1,495
Buffer	20%
Total Five Year Requirement	8,688
Total Supply (Council)	6,508
5YHLS	3.75 Years
Shortfall / Surplus	-2,180

Source: Lichfields Analysis

Table 6 Lichfields Amended 5YHLS (Using Sedgfield & Latest Uncapped Standard Method)

5YHLS (2023/24 to 2027/28)	Homes
Annual Requirement (Latest Uncapped Standard Method)	1,170
Five Year Requirement	5,850
Shortfall (from 2020/21 to 2022/23) (Based on 1,170 per annum requirement)	1,558
Buffer	20%
Total Five Year Requirement	8,890
Total Supply (Council)	6,508
5YHLS	3.66 Years
Shortfall / Surplus	-2,382

Source: Lichfields Analysis

- 4.4 The adoption of a Liverpool or Sedgfield method will ultimately be a matter for the examination to consider, but as principle the Council should strive to move to a Sedgfield method (i.e. meeting past shortfalls in the five year period) within the new Local Plan, such that unmet housing needs that accrue from past-shortfalls are addressed as early as possible to minimise the significant negative social consequences to individuals, families and households continuing to have the fulfilment of their housing needs delayed. To

continue to fall-back on the Liverpool method without striving to meet needs as early as possible is the antithesis of positive planning.

## 2. Plan-period supply

- 4.5 In total, the Council has identified a supply of 26,467 homes across the plan period (including 1,952 homes already delivered). This compares to a housing requirement of 24,129 homes; a surplus of 9.7% against the proposed plan-period housing requirement (Policy SS3).

Table 7 Total Identified Supply in Plan Period Compared to Proposed Requirement (Policy SS3)

Supply (2020/21 – 2040/41)	No. Homes (Canterbury CC)
Identified Housing Requirements (Policy SS3)	24,129
Total Supply (including delivery within the current plan period)	26,467
Shortfall / Surplus	+2,338 (+9.7%)

Source: Lichfields Analysis of 'Development Topic Paper' (2024)

- 4.6 As per our comments in the main representations (to which this note is appended to), the plan-period should be extended by at least a year to a total of 22-years (see Section 2). In addition, as detailed in our supporting 'Housing Need and Requirement' (Technical Note) – also appended to the main representations – the housing requirement should be updated to be at least 1,170 homes per year with the Council seeking to go higher than this (subject to further testing).
- 4.7 The combination of both means that the Council's requirement should increase to 25,750 homes across the extended plan-period. The Council's supply across this extended period is assumed to be 26,957 homes accounting for an additional 490 homes expected to deliver in 2041/42 from:
- (C6) Land at Merton Park: 160 homes
  - (C12) University of Kent: 160 homes
  - Windfall: 170 homes.
- 4.8 Taking account for these amends to the requirement, the Council's supply would only be sufficient to provide a surplus of 1,217 homes (+4.7%).

Table 8 Total Identified Supply in Plan Period Compared to Lichfields Amended Requirement

Supply	Canterbury CC Position (2020/21 – 2040/41)	Lichfields Position (2020/21 – 2041/42)
Identified Housing Requirements (Latest Uncapped Standard Method)	24,129 (21-year plan period)	25,740 (22-year plan period)
Total Supply (including delivery within the current plan period)	26,467	26,957
Shortfall / Surplus	+2,338 (+9.7%)	+1,217 (+4.7%)

Source: Lichfields Analysis of 'Development Topic Paper' (2024), Lichfields Analysis

4.9 Turning to the Council's purported supply, we have reviewed the evidence unpinning the assumed delivery of sites. Having undertaken this review, we do not consider the total housing supply expected to be realistic.

4.10 Appendix 1 to this note details a review of two key proposed allocations: site (C6) Land at Merton Park; and site (C12) University of Kent. These are two large sites of 2,250 and 2,000 homes each respectively. Reviewing their trajectories, we conclude that combined they will likely deliver 1,430 homes fewer than the Council expects (as per Table 9 below).

Table 9 Total Identified Supply in Plan Period Compared to Lichfields Amended Requirement

Lichfield Supply Amends	Proposed Plan Period (2020/21 – 2040/41)		Lichfields Position (2020/21 – 2041/42)	
	Canterbury CC	Lichfields	Canterbury CC	Lichfields
C6 – Land at Merton Park	1,750	950 (-800)	1,910	1,110 (-800)
C12 – University of Kent	1,580	950 (-630)	1,740	1,110 (-630)
Totals	3,330	1,900 (-1,430)	3,650	2,220 (-1,430)

Source: Lichfields Analysis of 'Development Topic Paper' (2024), Lichfields Analysis

4.11 Combining our requirement and supply amends, the Council in the proposed plan-period has just a 1.9% surplus (467 homes). In our extended plan period, there would not be sufficient supply to meet the updated requirement with a 0.8% shortfall (-213 homes). The implications of this are considered below and further in our main representations.



Table 10 Total Identified Supply in Plan Period Compared to Lichfields Amended Requirement

Supply (Lichfields Amends)	Proposed Plan Period (2020/21 – 2040/41)	Extended Plan Period (2020/21 – 2041/42)
Identified Housing Requirements (Latest Uncapped Standard Method)	24,570 (21-year plan period)	25,740 (22-year plan period)
Total Supply (including delivery within the current plan period)	25,037	25,527
Shortfall / Surplus	+467 (+1.9%)	-213 (-0.8%)

Source: Lichfields Analysis of 'Development Topic Paper' (2024), Lichfields Analysis

## 5.0 An Appropriate Headroom and Flexibility

- 5.1 The NPPF at Para 86(d) sets out that “*Planning policies should... be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances*”. In practice this means ensuring a housing trajectory has sufficient land supply across the Plan period so that it can adjust and accommodate any unforeseen circumstances. Critically, this means that to achieve a housing requirement a Local Plan must release sufficient land, or allow sufficient headroom, so that there is an appropriate buffer within the overall planned supply. This is helpful to address the eventuality that across the plan period some sites may not come forward – at all, or at the allocated rates – and ensures that the minimum target is met. This is especially important given the protections afforded by NPPF Para 76 to plans adopted in the past five-years; meaning development might be less quick to come forward where there is a realistic prospect of a shortfall in homes in the next five-year period.
- 5.2 As per Table 10 above, the Council has between a 1.9% surplus to -0.8% shortfall in terms of its supply against the updated uncapped local housing need figure (over either the proposed 21 year or the extended 22 year plan period respectively). We consider that this level of growth compared to local housing needs does not provide sufficient flexibility across the plan-periods. This is because:
- If a single strategic allocation of the supply does not come forward or if some strategic sites fall behind the timescales indicated in the trajectory, the housing requirement is unlikely to be fulfilled and the housing needs will not be met; and
  - There is no inbuilt flexibility to the supply to respond to any needs not anticipated by the Plan, such as if it were necessary for the housing market to rapidly respond to meet planned levels of employment growth (as explained in our housing need and requirement technical paper and the main representations).
- 5.3 In the context of the above review of the Plan’s trajectory, it is strongly recommended that greater flexibility should be built into the Plan, through the allocation of further sites and supply to provide more headroom in the trajectory over the lifetime of the plan. We’re aware of headroom’s up to 38% being applied in Local Plan contexts.

- 5.4 The previous Canterbury Local Plan (2017) was adopted with an 9.6% buffer (across the whole plan-period<sup>1</sup>). Elsewhere in the country, in the Guildford Local Plan a 37% headroom was found appropriate and justified (even in the context of Green Belt release) as it would help with issues of slippage in delivery and any unmet need from neighbours. The Inspector’s report on the South Oxfordshire Local Plan (Nov 2020) endorsed a 27% headroom (c.6,500 homes) stating a reduced level would make the plan “*much less resilient in the face of potential delays to one or more of the strategic allocations*”.
- 5.5 Similarly in Chelmsford (adopted May 2020) an 18% headroom was concluded by the Examining Inspector to be appropriate stating “*Overall, some 21,843 dwellings have a realistic prospect of being delivered over the Plan period... It more than provides for the identified housing requirement of 18,515 dwellings... It also provides a suitable buffer to ensure that the Plan remains robust in the event that there is slippage in the delivery of any of the allocated or committed sites. It also supports the provision of more affordable housing, improving overall affordability*”.
- 5.6 The Draft plan seeks to deliver a near 10% buffer (notwithstanding our points above on plan period and trajectory). Canterbury has a history of difficulties and delays in bringing forward many of its strategic sites as illustrated by the largest allocations from the previous Local Plan (2017) in the table below; already illustrative that the 9.6% headroom adopted for the previous Adopted Plan was fundamentally insufficient.

Table 11 Strategic Site delivery in Canterbury - Comparison of Adopted Local Plan (2017) and Actual Outturn

Site	Trajectory in Adopted Local Plan (2017)	Actual Trajectory
Site 1 – Land at South Canterbury Mountfield Park (4,000 homes)	First delivery (100 homes) in 2017/18. 1,600 homes by 2022/23	No homes delivered to date. Permission now granted, first homes anticipated 2025/26.
Site 2 – Sturry/Broad Oak (1,000 homes)	First delivery (140 homes) in 2018/19. 740 homes by 2022/23	First homes currently being completed on northern section. 31 completions by October 2023.
Site 3 – Hillborough (1,300 homes)	First delivery (120 homes) in 2018/19. 740 homes by 2022/23	Work commenced on site (following grant of PP at appeal) but no homes delivered by 2022/23; first homes delivered in 2023/24.
Site 5 – Strode Farm (800 homes)	First delivery (30 homes) in 2018/19. 450 by 2022/23	No homes delivered to date. Phase A granted in May 2022. First homes anticipated 2024/24

Source: Canterbury Local Plan (2017) Canterbury AMR 2022-2023

- 5.7 In the context that Canterbury’s spatial strategy and trajectory is highly susceptible to delays on strategic scale sites (either in the planning or the delivery stages), we consider a headroom in excess of 10% would be both appropriate and necessary in Canterbury for the trajectory to be effective, and have the necessary flexibility to respond to changing

<sup>1</sup> 15,635 homes planned for, plus 1,908 homes delivered = 17,543 homes compared to a 16,000 home requirement.

circumstances. Even then, as an illustration, a 10% headroom would equate to 2,457 to 2,574 home buffer (depending on the plan period used, using the latest uncapped standard method figure); requiring between an additional 1,990 to 2,787 homes being allocated in the respective plan-periods. This would at minimum restore the buffer originally planned for, but would likely need to be even greater.

## 6.0 Conclusions and Implications

6.1 The NPPF requires strategic policies to set out a trajectory of housing delivery across the plan period. The housing trajectory helps to demonstrate that the Plan is effective, and that the Plan's housing requirement will be delivered over the plan period from deliverable sites, developable sites, and from broad locations.

6.2 The Canterbury Draft Local Plan (2040) makes provision for a total of 26,467 homes to be delivered in the proposed plan period. This is a 9.7% headroom against the identified housing requirement at Policy SS3. Reviewing the Council's trajectory and combining this with analysis in respect of the housing requirement; we conclude the following:

- **Five-year supply:**

The plan as proposed would currently be unable to demonstrate a sufficient five-year land supply. Using the preferred 'Sedgefield' method – as per the PPG – the Council can only demonstrate between a 3.66 to a 3.75 years supply (depending on which requirement is used). Using the Council's preferred 'Liverpool' method the figure currently stands at 4.40 years.

To ensure the plan accords with national policy and is effective, additional sites need to be allocated to ensure a five-year supply can be demonstrated both on adoption, but also well into the plan-period. This is to ensure a sufficient rolling supply can be demonstrated given protections afforded to recently adopted plans (as per NPPF Para 76);

- **Plan-period supply and flexibility:**

To ensure the plan is positively prepared and effective, additional sites also need to be allocated. This is because:

1. As per our wider representations, the Council's uncapped local housing need is now greater owing to worsening affordability. In addition, the plan period should be extended by at least a year;
2. Reviewing two of the key new site allocations (C6 and C12), they are likely to deliver far later than currently expected. In total, we expect the two sites to deliver 1,430 homes fewer in the current plan period;
3. Combining our amends to the requirement and supply means that in the proposed plan-period, the Council would only have a 1.9% buffer. In our extended plan period, this would change to a 0.8% shortfall: i.e. the plan would not be able to deliver its housing needs and therefore may not be found to be positively prepared;

4. Noting the above, we consider that the plan should seek to exceed a 10% headroom of supply to ensure the minimum housing requirement is met. Even then, to restore a 10% headroom, as currently planned for by the Draft Plan, the Council will need to allocate an additional 1,990 to 2,787 homes (in either the proposed or the extended plan-period).

## Appendix 1 Site Reviews

### Site review 1: (C12) University of Kent

- A1.1 Based on the evidence available, the site is at the very earliest stages of coming forward. In the previous Reg.18 plan (October 2022), Policy C26 simply identified that land north of the University may have potential to support longer term development needs. It is now being put forward as a fully formed allocation to deliver 1,580 homes in the plan period (plus 200 C2 homes to 2040/41).
- A1.2 Currently, the Council assume that completions will first occur in 2030/31 (as per Table 12 below). This is the 8<sup>th</sup> year of the plan-period from the current 2023/24 base date.

Table 12 Expected Delviery From Site C12 (University of Kent)

PP Year (From 23/24 BD)	8	9	10	11	12	13	14	15	16	17	18	
Year	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	Total
Council Delivery	50	100	160	160	160	160	160	160	160	160	160	1,580

Source: Development Topic Paper (Feb 2024)

- A1.3 Considering the above trajectory and the evidence available, we consider the lead-in time (i.e. the period from when an application might be submitted to when homes start to be delivered) to be wholly unrealistic. This is when assessing the evidence for the site, its phasing assumptions, and using our own ‘Start to Finish’ (3<sup>rd</sup> Ed) (2024) research<sup>2</sup> as set out below:
- Overall, there is a lack of supporting published evidence for the site of any kind. It appears the site is being promoted by the University themselves (by their consultants Avison Young). There is no evidence published to date of a developer being on board to deliver it. Therefore, it will presumably need to be sold to a developer or a site promoter would need to come on board at a later stage;
  - The site policy also notes that the site must be developed “*in accordance with a masterplan and a detailed design code, demonstrating a comprehensive approach to development, long-term management and stewardship*” (C12 – 2a). Furthermore, Policy SS2 (7) states that schemes of more than 300 homes need a masterplan to be prepared with the community (presumably consulted upon) and subject to design review prior to the submission of an application. Then a design code will follow. There is no evidence that such a masterplan or design code has been progressed nor how one would be prepared;
  - The site status is noted as having ‘limited planning activity’ in the ‘Development Topic Paper’ (Feb 2024) (Table 8.7). This links to the ‘Phasing Methodology’ (2023) paper which notes that sites at this stage of the development process (or with ‘no planning

<sup>2</sup> <https://lichfields.uk/content/insights/start-to-finish-3>

activity' will be phased in between years 6 and 8 of the trajectory (see Table 6). However, it is not clear if this phasing is from the base-date or from when an application has been submitted. Given the site is phased to start delivering in year 8, one would assume it is the former; and

- Against this, Lichfields 'Start to Finish' (3<sup>rd</sup> Ed) (2024) research finds that sites of this size take 6.7 years to go from the first application to the first home being completed. This is for the 'median' site; with the lower quartile lead-in being 5.7 years<sup>3</sup> and the upper quartile being 9.5<sup>4</sup> years. Considering these:
  - a) Based on the 'median' total lead-in time (6.7 years), to achieve first delivery in 2030/31 would mean that an application would already have to have been submitted in July 2023 (assuming delivery from 1<sup>st</sup> April 2024).
  - b) The same is for the 'upper quartile' lead-in time (9.5 years). If the site took this long to deliver, an application would have had to have been submitted in October 2020 to achieve completions from 2030/31; and
  - c) Based on the 'lower quartile' lead-in time (5.7 years), to achieve first delivery in 2030/31 would mean that an application would need to be submitted in July 2024 (i.e. next month). There is no evidence that this timescale is in anyway achievable based on the evidence published, noting that the Council's own evidence states there is currently 'limited planning activity'.

These timelines above also make no allowance any potential masterplan to be prepared and agreed; potentially even adopted as an SPD or DPD as many Council's seek for developments of this scale.

A1.4 Given the above analysis, there is no realistic prospect of the site starting to deliver homes in 2030/31. Based on the median 'Start to Finish' (3<sup>rd</sup> Ed) (2024) lead-in time for a site of this scale, it site might start delivering 6.7 years from the submission of an application. If a masterplan was prepared for the site (with consultation with the community) immediately, and an application followed which was twin tracked for permission aligned with the adoption of the plan (aimed for June 2026), then this would put delivery in first completions until the last quarter of the 2032/33. However, there is no evidence that an application will be twin tracked as there is no developer on board and there is no evidence of the masterplan currently being prepared.

A1.5 We therefore consider that delivery of the site should be pushed back to 2034/35 at least. This assumes that the formal masterplanning process starts on the plan's adoption (aimed for June 2026); allowing 18 months for said masterplan to be worked up, consulted upon, and potentially adopted in an SPD (a similar timeframe with other national examples of this type of work<sup>5</sup>). This would be followed by an application for development with completions beginning the median lead-in of 6.7 years later. This would put delivery 8.2 years from the plan's adoption. This in and of itself is still an optimistic lead-in time given the substantial

<sup>3</sup> Lower Quartile 'planning approval period' = 4.1 years. Plus the 1.6 year 'planning to delivery' period = 5.7 years.

<sup>4</sup> Upper Quartile 'planning approval period' = 7.9 years. Plus the 1.6 year 'planning to delivery' period = 9.5 years.

<sup>5</sup> For example, the 'Milton Keynes East Development Framework' SPD which started preparation in July 2018 and was then first agreed to be adopted in January 2020': i.e. 18 months (noting it was adopted in March 2020 following the decision to adopt the SPD was challenged).

amount of work to bring forward the site (including the sale of the land to developers).

Table 13 Expected Delivery From Site C12 (University of Kent): Council and Lichfields Trajectory

(Scenario 1: Median Lead-in)

PP Year (From 23/24 BD)	8	9	10	11	12	13	14	15	16	17	18	
Year	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	Total
Council Delivery	50	100	160	160	160	160	160	160	160	160	160	1,580
Lichfields Delivery					50	100	160	160	160	160	160	950 (-630)

Source: Development Topic Paper (Feb 2024), Lichfields Analysis

- A1.6 If the site were to deliver in line with the upper quartile lead-in time for a site of this scale with an allowance for a masterplan to be prepared (c. 18 months), then the site would not start delivering until 2037/38. This would mean the site only delivering 470 homes in the proposed plan-period.

Table 14 Expected Delivery From Site C12 (University of Kent): Council and Lichfields Trajectory

(Scenario 2: Upper Quartile Lead-in)

PP Year (From 23/24 BD)	8	9	10	11	12	13	14	15	16	17	18	
Year	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	Total
Council Delivery	50	100	160	160	160	160	160	160	160	160	160	1,580
Lichfields Delivery								50	100	160	160	470 (-1,110)

Source: Development Topic Paper (Feb 2024), Lichfields Analysis

- A1.7 For the purpose of this review and in the context of the evidence published to date (noting more evidence will be published in the plan's preparation), we have assumed the site will achieve a median lead-in time (8.2 years including 18 months to prepare and agree a masterplan, potentially as an SPD) with the site starting to deliver in 2034/35. This means the site will deliver 630 homes fewer than currently expected (as per Table 13). Albeit, this is considered optimistic and we will review the site's trajectory in future consultations.

## Site review 2: (C6) Land at Merton Park

- A1.8 The site is allocated for 2,250 homes to the south of Canterbury; with the site expected to start delivering in 2029/30 (year 7 of the plan period from the current 2023/24 base date). Akin to site C12 above, a masterplan will need to be prepared in collaboration with the community (presumably with consultation) prior to an application being submitted. At present, no application has been submitted by the site is being promoted by Quinn Estates<sup>6</sup> (as Merton Park).

<sup>6</sup> <https://www.quinn-estates.com/projects/merton-park/>

A1.9 The current trajectory assumes that the site will start delivering in 2029/30. However, there is no evidence to date published as to when a masterplan will be progressed nor when an application will be submitted; with the 'Development Topic Paper' (Feb 2024) noting that there is currently 'limited planning activity'. In this context, development may not occur till 2033/34 (assuming a lower quartile lead-in time) or 2034/35 (assuming a median lead-in time); allowing time to prepare, agree, and agree a masterplan (potentially even adopting it as an SPD) post the plan's adoption (allowing 18 months for this process).

A1.10 For the purpose of this review and in the context of the evidence published to date, we have assumed the site will achieve a median lead-in time (8.2 years including 18 months to prepare and agree a masterplan, potentially as an SPD) with the site starting to deliver in 2034/35. This means the site will deliver 740 homes fewer than currently expected (as per Table 15).

Table 15 Expected Delivery From Site C6 (Land at Merton Park)

PP Year (From 23/24 BD)	7	8	9	10	11	12	13	14	15	16	17	18	
Year	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	Total
Council Delivery	50	100	160	160	160	160	160	160	160	160	160	160	1,750
Lichfields Delivery						50	100	160	160	160	160	160	1,010 (-740)

Source: Development Topic Paper (Feb 2024), Lichfields Analysis