

# POSITION STATEMENT IN RELATION TO MATTERS 9 & 10

On behalf of Lioncourt Strategic Land




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# 1 POSITION STATEMENT

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## **Introduction**

- 1.1 This statement has been prepared by RCA Regeneration Ltd on behalf of our client, Lioncourt Strategic Land and is submitted as evidence as part of the examination of the submitted North Warwickshire Local Plan.
- 1.2 Lioncourt are promoting land at Spring Farm, south of Watling Street, Grendon, which is a non-Greenbelt site. The site is unconstrained and could be delivered within the plan period in order to make up identified shortfall and could make the appropriate contributions towards the latter phases of the dualling of the A5, where there are question marks over the sources of funding for this.
- 1.3 This statement focusses on **Matter 9** of the Updated Draft Hearing Matters, Issues and Questions note prepared by the Inspector (Document Ref: INSP5A) which covers site allocations, as well as elements of **Matter 10**, which covers development management policies.
- 1.4 Lioncourt have participated in the EiP, having attended previous hearing sessions already. They have also previously submitted Regulation 19 representations.
- 1.5 We have not made comments in relation to sites other than those listed in this document but the generic points we make about delivery apply to the allocations as a whole.

## **Matter 9**

### **Site Allocations – Overarching Issues - Question 9.3**

*With reference to CD8/13B and PS.M8.01 are allocation yields and delivery trajectories justified and robust, including over the next five years?*

- 1.6 Lioncourt consider that there are insufficient smaller and medium sized sites, with an over-reliance on a small number of very large sites, which carries significant risk. We are aware this has been subject to some discussion under Matter 4.
- 1.7 Delivery rates at 50 dwellings per annum, per sales outlet are hugely aspirational for this area. Even the largest plc housebuilders deliver, on average (nationally) at a rate of around 0.85 per week. These figures have reduced from 2017 figures, as quoted from Taylor Wimpey's shareholder report<sup>1</sup> of March 2018:
- 1.8 *'Solid consumer demand continues to drive a healthy sales rate against a very strong comparator. Average private sales for the year to date were 0.85 sales per outlet per week (2017 equivalent period: 0.93) in line with our expectations'*
- 1.9 This equates to a national, annual sales rate, as an average, of 45 dwellings based on 2018 figures. This has fallen from the 2017 figures and may continue to fall into 2019/2020.
- 1.10 Persimmon plc report sales rates of 0.76 for the 2018 year-end<sup>3</sup> which equates to a national annual sales rate, as an average, of 39.52 dwellings.

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<sup>1</sup> <https://www.taylorwimpey.co.uk/-/media/Head%20Office/IR%20Comms%20images/2018/Merged%20presentation%20FINAL.pdf?la=en>

<sup>2</sup> <https://www.theguardian.com/business/2018/dec/18/house-prices-will-stagnate-in-2019-as-sales-fall-rics-says>  
<https://www.theguardian.com/money/2018/dec/17/housing-market-average-uk-asking-price-dips-10000>

<sup>3</sup> <https://www.persimmonhomes.com/corporate/media/355102/hy-2018-results-presentation-final.pdf>

- 1.11 Such rates are pulled up by areas with significant undersupply, such as the South East of England, and the likely picture for areas such as North Warwickshire may, in reality, be significantly below this.
- 1.12 We therefore consider the 50 dwellings per outlet figure (para 3.20 of CD8/13B) assumed for some of the largest sites in the District to be excessive and without robust evidence to justify it. We consider the rate should be reduced to a maximum of 40 dwellings per annum, where a volume/plc housebuilder<sup>4</sup> is in place as the promoter, and further reduced to 35 dwellings per annum where there is no housebuilder in place to account for delays associated with acquisition/legal due diligence, delays in securing detailed, implementable planning consent and associated site preliminaries. The assumptions made on the Polesworth and Dordon site are somewhat bewildering, and yet appear to be used as a 'benchmark' to be applied to many more large sites, which we strongly disagree with.
- 1.13 We consider the points already made by other participants, such as Gladman (ref Turleys Report, in relation to lead-in times to also be of concern. This is clearly evidenced from the number of strategic sites that are subject to 'languishing' planning applications, which are yet to see a decision notice.
- 1.14 Applying the Turley trajectory against the Council's there is a shortfall of 1,047 dwellings over the Plan period. This should be of significant concern.

#### **Site Allocations – Overarching Issues – Question 9.5**

- 1.15 *Local Plan paragraph 8.4 and policy LP7 indicates that the residential density of development should be at least 30 dwellings per hectare ('dph'). The average density for site allocations, excluding H23 Austrey, based on policy LP39 appears to be around 20.5 dph. The lowest*

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<sup>4</sup> That is, a housebuilder with a proven track record of delivery at that scale.

*densities at allocations H7, H18 and H19 are between 12 and 14 dph. Is the plan's approach to density appropriate?*

- 1.16 Firstly, we consider that densities need to be measured in a unified way (i.e. net vs gross) and this must be explained in order that participants are clear what constitutes development density. We would encourage a discussion at the hearing that clarifies what the councils understand is of this, as well as that of the other participants.
- 1.17 Overall a development density of 30dph is considered to be fairly 'suburban' and is a common density seen throughout many of the West Midlands shire authorities. Indeed, development densities may be driven up in some cases, with a desire to be achieving more like 35dph (Bromsgrove, South Staffordshire) in some of the latest emerging plan reviews.
- 1.18 However, the reality for North Warwickshire is that such densities are not necessarily being achieved and increasing density is unlikely to assist with delivery rates in what might be a slowing marketplace.
- 1.19 We consider that in light of the evidence, that development densities should be assumed to be delivered at a maximum of 25dph, pending the outcome of further annual reviews.
- 1.20 The outcome of both revising delivery rates and development densities downwards will have an effect on the annualised assumptions to be made about each of the strategic/large housing allocations, particularly those without a housebuilder actively promoting them.
- 1.21 Applying a 35 dwelling per annum delivery rate to non-housebuilder promoted sites and 40 to housebuilder sites (with permission), it appears that there will be an average of 20% fewer dwellings per site being delivered during the first 5 years of the plan. Applying a reduced development density would clearly compound this, although the data is not currently available

to make a clear calculation as to the effect of reducing assumed development densities from each site.

#### **Site Allocations – Overarching Issues – Question 9.9**

*Do allocations for housing and employment, were they to be subject to MM9 and MM39 [NWBC20A], contain sufficient flexibility or contingency for future change and to ensure delivery in line with forecasts?*

1.22 MM9 is, we consider still too nebulously-worded. The triggers and actions need to be precisely defined in order that if provision falls short, action is taken quickly and meaningfully. Such a statement could be interpreted widely and it gives little comfort to developers, local residents and other stakeholders about what is meant by it.

1.23 We have no comment to make in relation to MM39.

#### **Site Allocations – Overarching Issues – Question 9.10**

1.24 *Is there a rationale for referencing certain Local Plan requirements inconsistently, such as provision of Sustainable Urban Drainage Systems in certain allocations but not others? Is there a rationale for setting only certain allocations as a minimum number? Should a consistent size threshold be set for terming a site 'strategic' or requiring that masterplans are prepared?*

1.25 We consider that as a baseline, there should be a consistent approach to the application of policies that require sustainable urban drainage systems, with perhaps the exception of brownfield/previously developed sites only. Allocations should be approximate, based on the densities we have already discussed and nothing more. Setting maximum or minimum figures without the full suite of information that would typically be available at pre-commencement



stage is over-reaching and could undermine the delivery of the plan, when taken cumulatively. Our answer also (for instance) applies to Question 9.19(B).

- 1.26 Strategic means different things to different planning authorities, however in our view it generally applies to sites of 250 dwellings or more. In reality, if the council would like greater certainty over delivery, requiring masterplans and/or indicative layout plans, based on known constraints is always going to be helpful in being clear on the capacity of a site. Such an approach should be encouraged on sites of 50 units or more.

### **Matter 10**

- 1.27 *Question 10.3 NWBC11 sets out aggregate housing completions since 2011 (as discussed under matter 8, viability and delivery). With reference to Local Plan policy LP9, what is the figure for affordable housing provision of different types over that period?*
- 1.28 Whilst we are not putting forward an answer to this question as such, we consider it appropriate for the council to state clearly how many affordable homes (whether in council ownership or RP ownership), since 2011, have been lost under 'right to buy' in order to show the true picture of net affordable housing delivery in the District. This clearly could have implications for overall housing delivery, if the shortfall is greater than anticipated.
- 1.29 Beyond having a realistic picture of affordable housing delivery is being able to make a realistic assumption of what will come from each allocation. Given the sessions covering Matter 8, it is clear that there is a significant unknown surrounding the costs/required funding for Phases 3 and 4 of the dualling of the A5 around the Grendon Reserve Site, given it is required to be complete and open towards the latter stages of the plan period. Given that the alternative to this delivery will result in a 'severe' impact, there is a strong possibility that affordable housing delivery could be substantially undermined because of the requirement for offsite highways contributions from developers.