

Phasing Methodology 2023



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1. Introduction

- 1.1. The Canterbury District Local Plan 2017 sets out the housing target of 16,000 new homes between 2011 - 2031.
- 1.2. The draft Local Plan aims to meet the housing need figure identified by the standard methodology.
- 1.3. The council is committed to taking a proactive approach to housing delivery in the District and engages with the development industry and other delivery partners.
- 1.4. The council is required to monitor the progress of housing completions and to set out a five year supply of housing land coming forward. As part of this monitoring the council carries out an assessment of when housing, either with planning permission or contained within the adopted or draft Local Plan, is expected to be built.
- 1.5. In 2018, the council published its first Phasing Methodology document. The council has reviewed the document and available information, engaged with the development industry and produced this 2023 updated version.
- 1.6. The purpose of this document is to help inform the annual housing assessments within the Housing Land Supply Document, when site specific information is not available. Parameters and assumptions, based on the type and size of housing sites, are identified to reflect the local characteristics of Canterbury District's development industry.
- 1.7. The methodology sets out:
 - A review of national studies on delivery and local evidence;
 - A set of assumptions related to lead-in times to be used in the land supply assessment; and
 - A set of assumptions related to build-rates to be used in the land supply assessment.

2. Methodology

Monitoring Process

- 2.1. The council publishes annually its housing land supply assessment which demonstrates the number of dwellings expected to be built in each year of the Local Plan, including whether sites will build out within the next 5 years or whether they will take longer to develop.
- 2.2. The council assesses the deliverability of housing sites with regard to the National Planning Policy Framework 2021, especially paragraph 68 and the definitions of **deliverable and developable**, Planning Practice Guidance and other relevant documents.
- 2.3. The council takes a cautious and robust approach, based on up-to-date information and clear evidence, when phasing sites. The year long monitoring process includes:
 1. *New planning permissions* - updating extant planning permission records as new applications are permitted.
 2. *Completions* - using Council Tax, Building Control or Street Name and Numbering records data around completions is updated.
 3. *Site surveys* - council officers visit sites subject to planning applications, both extant permissions and allocations, that are not complete.
 4. *Developer engagement* - the pro-forma is circulated to developers, house builders, agents or applicants for certain extant planning permissions and all allocated sites.
 5. *Site specific information gathering* - based on the detailed knowledge of case officers' (and infrastructure/transport officers if appropriate) information is gathered on the individual sites, including known delays and interdependencies of sites.
 6. *'Sense checking'* - information provided via the pro-forma is 'sense checked' against known delays, information provided by the relevant officers and the Phasing Methodology.
 7. *Strategic sites* - an extra step is undertaken for strategic sites where through further discussions with the developers, agents or site promoters, Statements of Common Ground are produced.

- 2.4. The council will always try to obtain direct information on the delivery of housing sites in the first instance; however there are instances where direct information cannot be obtained or the information submitted needs to be 'sense checked'. The council has therefore developed this Phasing Methodology, based on the steps set out below, to provide a robust approach to assessing the deliverability of housing sites.

How was this document produced?

Step 1: Consider National Studies

- 2.5. There are some nationally recognised evidence studies on lead in times, which includes:
- Start to Finish: What factors affect the build-out rates of large scale housing sites? By Lichfields (Second Edition, February 2020)¹;
 - Urban Extensions Assessment of Delivery Rates by Savills (October 2014);
 - Housing Supply Research by Parsons Brinkerhoff for CPRE (2014);
 - Permissions to Land: Busting the myths about house builders and land banking by HBF (May 2014); and
 - Independent review of build out: final report, Rt Hon Sir Oliver Letwin MP (MHCLG 2018).
- 2.6. The 2020 Start to Finish report by Lichfields, is the second edition of their 2016 report. Key differences includes:
- Changes in the average planning approval period by size - 50-99 takes slightly longer, while 2,000+ has remained the same. All of the other 4 size ranges have reduced the approval period;
 - Provides housing delivery as dwellings per annum as a % of the total dwellings on site;
 - Mean housing delivery has decreased in all groups;
 - Greenfield site still build out quicker than brownfield, however the housing delivery per annum has increased on brownfield sites more significantly than on greenfield sites; and
 - Identifies that sites with more outlets build more homes per year, but each individual outlet has less completions. For example one outlet had an average of 61dpa, two outlets had 51dpa while three outlets had 45dpa.
- 2.7. Regard has also been given to the Letwin Independent review of build out: both the final report (Oct 2018) and the draft analysis (July 2018). The independent review looked at the cause of the gap between housing completions and the amount of land allocated or

¹ Available from:
https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf

permitted in areas of high housing demand and considered factors such as market absorption rates and build out rates.

2.8. Some of the key messages include:

- Strategic and larger sites have the greater overall lead in time, although large sites tend to then be speedier to 'open up' and deliver greater numbers of completions quicker.
- Medium/smaller sites (i.e. not large scale urban extensions) have a shorter lead in time and may go straight to full planning permission rather than outline, however they tend to have slightly longer lead in times to completions once consent is granted.
- Affordable housing and other tenure products can increase the rate at which completions can be achieved.

2.9. However, relying solely on national studies does come with inherent risks and it is important to acknowledge their limitations, including:

- Comparisons between studies may not be easy due to the type of sites examined and/or the period of the development process reviewed, often the studies use different ranges of site size or have different starting points (e.g. submission of an application vs the approval of an application) to determine the time taken to reach initial completions;
- Some studies view each stage of the delivery process as discrete such as conditions being fully discharged before work could begin on preparing a reserved matters application, when in reality some stages can overlap leading to shorter lead in times; and
- The use of average timescales can mask significant variances caused by sites subject to significant lead in times of 10+ years which is well outside the normal range.

Step 2: Consider Local Evidence

2.10. The council presented local evidence on lead-in times and delivery rates to the examination of the Canterbury District Local Plan in 2015 and 2016, and for the 2018 version of the Phasing Methodology. This evidence showed that the housing market in the District has produced faster than national average lead-in times and that this was expected to continue into the future.

2.11. This analysis on local lead-in time and build out rates has been reviewed and updated to inform this document.

2.12. Some of the reasons why Canterbury District has shorter lead-in times are:

- There is an appetite for development (to be delivered in tandem with infrastructure projects);

- Land and property sales values are good and above other East Kent areas;
- The district has an attractive environment which developers want to build in and people want to live here;
- Good transport connections within and beyond the district; and
- The focus is on greenfield urban extensions which benefit from integration to existing settlements and associated facilities.

2.13. The council as a local planning authority also promotes practices and procedures which facilitate shorter lead-in times, such as encouraging hybrid applications, entering into planning performance agreements, and focused internal practices on strategic development sites.

2.14. In combination these features and procedures create the ideal environment for accelerating housing delivery and therefore the council is confident the district will continue to experience expeditious lead-in times.

Step 3: Stakeholder Engagement

2.15. To support the production of the 2018 Phasing Methodology, workshops and surveys were conducted with the newly formed Housing Delivery Group to gather first-hand experience. For more information on this please see the 2018 Phasing Methodology².

2.16. Since the formation of the Housing Delivery Group, engagement is undertaken annually to gather district-wide information on delivery³.

2.17. In April and May 2022 surveys were circulated to the Housing Delivery Group, for the 2020/21 Housing Delivery Test Action Plan⁴. The survey included specific questions on the phasing methodology to inform this review.

2.18. Comments from the Housing Delivery Group on the Phasing Methodology included:

- The size of sites is correct and justified;
- Build out rates still seem appropriate but will be guided by the strength of the market over the coming months;
- Small sites could go up to 9 dwellings, leaving smaller sites as 10-99;
- Small sites are unlikely to build circa 40 dwellings p.a;
- Build out rates are overly optimistic and not appropriate. If it is known there are multiple housebuilders operating on the site then the higher assumptions would be

² Available on the council's website:

<https://drive.google.com/drive/folders/1IGeX9bc1xlbk5ksy0bxuUhrUqA4eZEYK>

³ Further information is available in the Housing Delivery Test Action Plans and Housing Land Supply documents (sometimes within the AMR) for each year, on the councils website.

⁴ Further information is available on the council's website:

<https://drive.google.com/drive/folders/1IGeX9bc1xlbk5ksy0bxuUhrUqA4eZEYK>

justified. Believes the Lichfields Start to Finish (2nd Edition) Report build out rates would be more appropriate;

- The medium sites capacity is quite a wide range where issues associated with sites in terms of on-site/off-site infrastructure can vary quite significantly between 100 and 499 dwellings. A further mid category might therefore be appropriate;
- The lead-in times were based upon the Lichfields Start to Finish Report which has since been updated and therefore the Council should consider any changes to its findings; and
- At a local level the substantial delivery issues associated with the Stodmarsh must be reflected in lead-in times, at least on a temporary basis.

Step 4: Draft update to the document

- 2.19. Based on the information from all the workshops and surveys undertaken with the Housing Delivery Group, as well as other sources of information (identified above), the council identified areas of the document it considered appropriate to update.
- 2.20. These proposed changes are listed under the questions analysed in Step 5 and the changes included within this final version are listed under Step 6.

Step 5: Stakeholder engagement on proposed amendments

- 2.21. In April and May 2023, the Housing Delivery Group was consulted on the proposed changes to the Phasing Methodology and offered another opportunity to provide local feedback.
- 2.22. Eight responses were received from:
- AKDC Limited
 - Carter Jonas LLP on behalf of Trustees of the Lord Fitzwalter (1988) Settlement
 - Canterbury City Council - Local Authority Housing Strategy officer
 - Countryside Partnerships
 - Esquire Developments
 - Kent County Council
 - Nexus Planning on behalf of Hallam Land Management
 - Persimmon Homes
- 2.23. Below provides an overview as to what questions were asked, the responses from the Housing Delivery Group and the council's response having reviewed the questionnaire representations.
- 2.24. **Question 1** proposed amending the category of site sizes so that Small Sites changed from 'up to five dwellings' to 'up to nine dwellings', which then means Smaller Sites change from

'6-99 dwellings' to '10-99' dwellings. This means that Small Sites should be all proposals which are non-major development according to the NPPF (2021) definition.

- 2.25. All respondents agreed with this amendment, and there were no further comments.
- 2.26. **Question 2** proposed phasing allocated Medium Sites (100 - 499 dwellings) with no planning activity in Year 6. In the 2018 Phasing Methodology these were not phased against a specific year in the table.
- 2.27. Six agreed (75%), one respondent did not know and one respondent did not agree.
- 2.28. The respondent who did not agree, suggested the continuation of the current approach of not phasing these sites against a specific year. While their views and supporting evidence is noted, these sites are still considered developable and therefore a standard assumption as to what year to phase the completions in is essential for the production of the IDP and phasing of sites over the entire Local Plan period.
- 2.29. Therefore, in this case, the council agrees with the majority of respondents and proposes the inclusion of this standard assumption where site specific information on phasing is not available.
- 2.30. **Question 3** proposed that Large Sites (500 - 1,999 dwellings) with an outline permission under consideration be pushed back a year to Year 5, while Large Sites with limited planning activity and Large Sites with no planning activity are both added to the table against Year 6 and Year 7 respectively.
- 2.31. Six agreed (75%) and the remaining two respondents did not agree.
- 2.32. While the first respondent to select disagree, did agree that the distinction between sites with limited and no planning activity is logical, they do not agree that Large Sites with no planning activity should be phased against a year. They believe this site type and planning status should be left as currently noted in the 2018 Phasing methodology: not phased against a specific year.
- 2.33. As mentioned under question 2, to help inform the IDP and housing phasing over the entire Local Plan period the council considers the standard assumptions should cover all possibilities to allow fact checking of developer information and ensure the trajectory evidence is robust.
- 2.34. The second comment was disagreeing based on the premise that the council will need to consider whether there is a reasonable prospect for delivery and whether there are any

barriers to the site coming forward. These factors are likely to be site specific rather than the same specific year for every site.

- 2.35. The council agrees each site will be subject to an assessment of whether they are deliverable / developable or not. These assumptions are in place for once those assessments have been completed, when there is no site specific phasing information for specific years and there are no specific factors delaying sites. Where there are site specific barriers to delivery the council would expect the developer to inform the council during the monitoring process so that alternative timescales can be agreed, and where appropriate a Statement of Common Ground signed.
- 2.36. Therefore, in this case, the council agrees with the majority of respondents and proposes the inclusion of this standard assumption.
- 2.37. **Question 4** proposed that both Super Sized Sites (2000+ dwellings) which have an outline permission under consideration and Super Sized Sites with limited planning activity be pushed back a year to Year 5 and Year 6 respectively. It also proposed that Super Sized Sites with no planning activity be added to the table and phased in Year 8.
- 2.38. Six agreed (75%), while two respondents did not agree.
- 2.39. One respondent who disagreed highlighted that the sites in 5 years must meet the NPPF definition of deliverable and site phased Year 6 onwards must meet the NPPF definition of developable. The respondent did not disagree with the phasing of Super Sized Sites which have Limited Planning active or No Planning Activity. There were concerns that there would be situations when it was appropriate to phase super sized sites earlier, but as the respondent said these will be due to site specific circumstances which the developer will inform the council of. The council will then review the evidence and circumstances to determine the appropriate phasing for the individual site. The developer will be expected to sign a Statement of Common Ground as evidence to justify the variation from the standards in the Phasing Methodology.
- 2.40. The second respondent who selected 'disagree' on the questionnaire, actually agreed with the proposed phasing of Super Sized Sites with outline permission under consideration and sites with Limited Planning Activity. Their disagreement was with the phasing of Super Sized Sites with no planning activity. The respondent considers these sites should remain without a phasing year. While their views and supporting evidence is noted, these sites are still considered developable and therefore a standard assumption as to what year to phase the completions in is essential for the production of the IDP and phasing of sites over the entire Local Plan period.

- 2.41. Therefore, in this case, the council agrees with the majority of respondents and proposes the inclusion of this standard assumption.
- 2.42. **Question 5** listed 7 general assumptions and sought feedback on these:
1. Sites which are granted subject to s106 (such as through Planning Committee), will be considered as a site with planning permission and deliverable. The phasing of these sites will be based on the Phasing Methodology and any site specific information on timescales for signing the s106.
 2. Site types of reserved matters will defer to the number of dwellings included within the reserved matters rather than the number of dwellings within the outline permission.
 3. Consideration will be given to conditions which need discharging and where appropriate an additional year may be identified in the lead-in times between decision and completion if the number of conditions is extensive and / or complex.
 4. Both engagement and national studies showed very little difference in overall lead in times and delivery rates between greenfield and brownfield site typologies, this is reflected in the phasing, and accordingly the assumptions cover both types of site.
 5. If a demolition is included within the proposal that demolition would be in Year 1 and construction/completion of the dwellings in Year 2 (or at least initial completions for larger sites).
 6. For any conversions from dwellings to flats or subdivisions, losses will be recorded the same year as gains within the phasing.
 7. Nutrient neutrality required in relation to adverse effects on Stodmarsh protected sites has the potential to affect some sites:
 - Lead-in times will not be affected for any application with a detailed planning permission or outside the catchment area.
 - Sites of over 300 dwellings will be expected to provide specific mitigation measures and as this has been agreed on other sites it is not expected to change lead-in times.
 - Other allocated and draft allocated sites which are required to demonstrate nutrient neutrality may require a further year at no or limited activity stages before submitting a planning application to identify a mitigation strategy. This will be assessed on a site by site basis and take into consideration any district or catchment-wide strategies that may be available at the time.
 - At such a time as a district or catchment-wide strategy is adopted lead-in times will return to the normal assumptions.
- 2.43. This question was not mandatory and as such 3 respondents did not provide any comments. 1 respondent agreed all 7 assumptions were reasonable and 4 provided comments which are discussed below.

- 2.44. Two respondents commented on the general assumption of deeming sites which have been granted permission subject to a S106 at planning committee as having planning permission. One disagreed with the general assumption, as a developer cannot implement a consent until a decision notice is issued and the same rule should apply to the council decisions. The second voiced concerns about moving away from the definition of deliverable and noted the potential for S106 negotiations to delay the grant of planning permission.
- 2.45. On this basis the council proposes to amend this general assumption to read 'Sites which are granted permission subject to s106 (such as through Planning Committee) prior to the end of the monitoring period, and where the decision notice is issued prior to the publication of the housing phasing, will be included within the land supply as a site with planning permission and either deliverable or developable. The phasing of these sites will be based on the Phasing Methodology and any site specific information.'
- 2.46. Another respondent sought further guidance on what defines a complex or extensive set of conditions. However, this is something that must be assessed on a site by site basis and not only depends on the condition but the site and its size.
- 2.47. A respondent raised concerns that consideration will need to be taken of any lead in times where mitigation measures need to be implemented. The construction of such measures may impact the ability to start on housebuilding/occupations and could therefore have a direct impact on the year of first completions.
- 2.48. The council identified point 3 of the general assumptions to address this issue. To make it more robust the council proposes to expand bullet point 3 to cover significant mitigation measures and S106 and S278 requirements which are required prior to commencement.
- 2.49. On Point 7, a respondent raised concerns that the lead-in times for sites which cannot discharge into the Southern Water main sewer were not long enough. They suggested that the lead in time should be extended by 12-18 months to take into account the additional time and costs involved with securing the necessary permit.
- 2.50. On this basis the council proposes to amend point 7, in relation to the 300+ dwelling assumption to add that where the mitigation measures include a development not connecting to a main sewer and therefore needing a permit, an additional year between granting permission and first completions will be added to the phasing.
- 2.51. The council proposes to include the general assumptions with the agreed amendments outlined above.

- 2.52. **Question 6** asked whether there were any additional general assumptions, not included, that the council should consider.
- 2.53. 3 respondents provided suggestions while the remaining 5 had no further comments.
- 2.54. One respondent questioned the lack of a general assumption addressing sites where landowners/developers secure planning permission, but are then mothballed. Without direct information the council is unlikely to be able to predict when this has happened as planning permission unusually has a three year implementation period. Therefore, it is not considered necessary to include a specific assumption on this scenario as it is not something the council can predict. Where direct information confirming a site is not being progressed (irrespective of planning permission or just an allocation) is provided, said site will be removed from the housing trajectory.
- 2.55. The second comment was in relation to build out rates within the 2018 Phasing Methodology appearing to contain quite high assumed annual yields. The council agreed with these comments and this is why alternative build-out rates were proposed in question 8. The respondent agreed with the proposed amendments to build out rates in question 8 which would suggest their concerns have been adequately addressed.
- 2.56. The final comment was a more general point about ensuring a mix of large and smaller scale sites to meet the housing requirement. This is being reviewed through the draft Local Plan and not appropriate for this document.
- 2.57. In conclusion, no further general assumptions have been included.
- 2.58. **Question 7** asked whether there were any further changes to any of the site size assumptions on lead-in times that the council should consider.
- 2.59. 6 respondents had no additional comments and one specifically agreed that the phasing assumptions are supported.
- 2.60. The remaining respondent raised outstanding concerns over Small Sites build out rates being optimistic but provided no additional evidence. It is considered that as the proposed build out rates for Small Sites is informed by national and local data and the size of the sites mean there are normally less factors that can cause long delays (less infrastructure requirements). Then the proposed build out rates are appropriate assumptions to use when site specific information is not available.
- 2.61. No further amendments were made to the lead-in times.

- 2.62. **Question 8** proposed alternative build out rates compared to those in the 2018 Phasing Methodology. The proposed revised values were:
- Small Sites (nine or less dwellings) - N/A (Potential average annual yield). All to be delivered in one year
 - Smaller Sites (10 - 99 dwellings) - 30 (Potential average annual yield). Up to 60 for sites at the higher end and with lots of affordable housing
 - Medium Sites (100 - 499 dwellings) - 80 (Potential average annual yield). Closer to 50 for smaller sites and up to 130 for larger sites or those with more outlets
 - Large Sites (500 - 999 dwellings) - 100 (Potential average annual yield). Up to 160 for larger sites and those with more outlets
 - Large Sites (1,000 - 1,999 dwellings) - 120 (Potential average annual yield). Up to 190 for larger sites and those with more outlets
 - Super Size Sites (+2,000 dwellings) - 160 (Potential average annual yield). Up to 300 for larger sites and those with more outlets
- 2.63. 7 respondents agreed with the proposal, while 1 disagreed.
- 2.64. The respondent who disagreed suggested that the upper limit for Super Size Sites (+2,000 dwellings, Large Sites (1,000 - 1,999 dwellings) and Large Sites (500 - 999 dwellings) be reduced to 200, 175 and 150 respectively.
- 2.65. The council has decided to keep 'up to 300' dwellings on Super Size Sites as this is the figure strategic Site 1: South Canterbury has been proposing to build out at since the 2017 Local Plan examination, which was agreed by the Planning Inspector.
- 2.66. The council agrees to lower Large Sites (500 - 999 dwellings) from 160 to 150. The council has decided to lower Large Sites (1,000 - 1,999 dwellings) from 190 to 180. This is close to the suggested amendment and would be roughly 9% of the maximum number of dwellings in this category which aligns with the Litchfields Start to Finish report (2020).
- 2.67. The remaining build out rates will be taken forward as currently set out. These are baseline assumptions and there may be cases where the actual phasing is higher or lower than these assumptions due to site specific information.
- 2.68. **Question 9** proposed the addition of general assumptions for stepped delivery on the basis that analysis suggested that the first year of completions is often a lower build out rate. These assumptions were:
- 'large' and 'super sized' sites will build out around 50 dwellings,
 - 'medium' sites will build out around 20 dwellings; and
 - 'smaller' and 'small' sites will build out around 10 dwellings.

- 2.69. 6 respondents (75%) agreed with the proposal, while 2 disagreed.
- 2.70. One of the two respondents who disagreed would anticipate the upper end of the 'medium' category to be significantly higher than 20 dwellings, in order to recover the up front infrastructure and servicing costs associated with such schemes. The council proposes to continue with the cautious approach within the general assumptions but could amend these on individual sites based on site specific information. It is cautious to assume where the site specific information is not available the developer is unlikely to be building out quickly.
- 2.71. The other respondent agreed with the principle of reducing first year completions but recommended that the first year be phased at circa 50% of normal annual delivery rates due to factors such as what time of year a developer starts on site and what enabling works are necessary. While this would be an easier approach it has not been reflected within the local build out rate data. The phasing of individual sites can be amended based on developer feedback so the council proposes to continue with the cautious route that has been proposed for the general assumptions.
- 2.72. Therefore, in this case, the council agrees with the majority of respondents and proposes the inclusion of these standard assumptions.
- 2.73. **Question 10** asked a general question about whether there were any further comments on phasing assumptions, lead in times or build out rates within our district.
- 2.74. There were no further comments or suggestions from any of the respondents.

Step 6: Finalise the Phasing Methodology

- 2.75. Based on the consultation with the Housing Delivery Group the following changes have been made from the 2018 Phasing Methodology:
- Small Sites have been changed from 'up to five dwellings' to 'up to nine dwellings';
 - Smaller Sites have been changed from '6-99 dwellings' to '10-99' dwellings;
 - Allocated Medium Sites (100 - 499 dwellings) with no planning activity have been added and phased in Year 6;
 - Large Sites (500 - 1,999 dwellings) with an outline permission under consideration have been pushed back a year to Year 5, while Large Sites with limited planning activity and Large Sites with no planning activity are both added to the table against Year 6 and Year 7 respectively;

- Super Sized Sites (2000+ dwellings) which have an outline permission under consideration and Super Sized Sites with limited planning activity have been pushed back a year to Year 5 and Year 6 respectively. Super Sized Sites with no planning activity have also been added to the table and phased in Year 8.
- Inclusion of general assumptions:
 1. Sites which are granted **permission** subject to s106 (such as through Planning Committee) **prior to the end of the monitoring period, and where the decision notice is issued prior to the publication of the housing phasing**, will be **included within the land supply as a site with planning permission and either deliverable or developable**. The phasing of these sites will be based on the Phasing Methodology and any site specific information.
 2. Site types of reserved matters will defer to the number of dwellings included within the reserved matters rather than the number of dwellings within the outline permission.
 3. Consideration will be given to conditions which need discharging, **significant mitigation measures which need implementing and requirements of S106 and S278 agreements, which are required prior to commencement**. Where appropriate an additional year may be identified in the lead-in times between decision and completion if the number of conditions is extensive and / or complex, **or there are substantial lead-in times for the mitigation measures, S106 or S278 agreements which could delay development**.
 4. Both engagement and national studies showed very little difference in overall lead in times and delivery rates between greenfield and brownfield site typologies, this is reflected in the phasing, and accordingly the assumptions cover both types of site.
 5. If a demolition is included within the proposal that demolition would be in Year 1 and construction/completion of the dwellings in Year 2 (or at least initial completions for larger sites).
 6. For any conversions from dwellings to flats or subdivisions, losses will be recorded the same year as gains within the phasing.
 7. Nutrient neutrality required in relation to adverse effects on Stodmarsh protected sites has the potential to affect some sites:
 - Lead-in times will not be affected for any application with a detailed planning permission or outside the catchment area.
 - Sites of over 300 dwellings will be expected to provide specific mitigation measures. **Where these measures include a development not connecting to a main sewer and therefore needing a permit, an additional year between granting permission and first completions will**

be added to the phasing⁵. Other potential mitigation measures are not expected to change lead-in times.

- Other allocated and draft allocated sites which are required to demonstrate nutrient neutrality may require a further year at no or limited activity stages before submitting a planning application to identify a mitigation strategy. This will be assessed on a site by site basis and take into consideration any district or catchment-wide strategies that may be available at the time.
 - At such a time as a district or catchment-wide strategy is adopted lead-in times will return to the normal assumptions.
- Changes to the build out rates:
 - Small Sites (nine or less dwellings) - N/A (Potential average annual yield). All to be delivered in one year.
 - Smaller Sites (10 - 99 dwellings) - 30 (Potential average annual yield). Up to 60 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
 - Medium Sites (100 - 499 dwellings) - 80 (Potential average annual yield). Closer to 50 for smaller sites and up to 130 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
 - Large Sites (500 - 999 dwellings) - 100 (Potential average annual yield). Up to 150 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
 - Large Sites (1,000 - 1,999 dwellings) - 120 (Potential average annual yield). Up to 180 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
 - Super Size Sites (+2,000 dwellings) - 160 (Potential average annual yield). Up to 300 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
 - The inclusion of general assumptions for stepped delivery as the first year of completions is often a lower build out rate. These assumptions are:
 - 'large' and 'super sized' sites will build out around 50 dwellings,
 - 'medium' sites will build out around 20 dwellings; and
 - 'smaller' and 'small' sites will build out around 10 dwellings.

⁵ Where a site falls under this situation and point 3 about complex conditions/legal agreements also applies, only 1 additional year will be added between granting permission and first completions as it is assumed that both can be dealt with simultaneously.

2.76. In light of the extensive engagement with the development industry and analysis of both local and national data, the council considers the assumptions set out within this document have been rigorously tested and provide clear evidence for assessing delivery.

3. Assumptions on lead-in times

- 3.1. This section sets out our assumptions on which year within the land supply the council will phase particular sizes of site based on the stage in the delivery process reached.
- 3.2. The types and scales of site size have been selected to reflect both adopted and draft Local Plan allocations and those historically seen coming forward as planning applications. The site sizes are also comparable to those used in the most commonly referred to national studies which allows analysis between national averages and the local delivery picture.
- 3.3. For each of the sizes of site a table has been produced. Each row sets out the various stages a site may have reached at the end of each monitoring period. The columns contain the forthcoming years including the 5yr supply period. The table then colour codes the year at which the council expects to see the first completions on site.
- 3.4. Both sites allocated in the adopted 2017 Local Plan and draft allocated sites for the new Local Plan can be included in the housing land supply. Draft allocations will be afforded weight depending on the stage the Local Plan is at.
- 3.5. Below are the terms used in the tables and what they mean.

Table 1: Definitions of key terms

Term	Definition
Detailed planning permission granted	The development has a detailed consent either: a full planning permission, change of use permission, a lawful development certificate, the detailed element of a hybrid application (this should include a number of new dwellings), or any other form of permission that fully consents the development.
Outline permission	Outline permissions do not provide fully detailed consented development and require additional details to discharge conditions and subsequent reserved matter applications.
Limited planning activity	This covers instances where no planning application has been submitted yet but progress towards submitting one is being made, for example any EIA applications, any pre-application discussions being undertaken. This generally refers to allocated and draft allocated sites as they have a level of certainty that the proposal for housing in that location is suitable.
No planning activity	No planning application has been submitted and there is no

	evidence of progress being made towards submitting one. This will predominantly apply to allocated and draft allocated sites as they have a level of certainty that the proposal for housing in that location is suitable.
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General assumptions

- 3.6. Due to the complex nature of producing a Housing Land Supply statement a few general assumptions can be made across all housing types.
1. Sites which are granted permission subject to s106 (such as through Planning Committee) prior to the end of the monitoring period, and where the decision notice is issued prior to the publication of the housing phasing, will be included within the land supply as a site with planning permission and either deliverable or developable. The phasing of these sites will be based on the Phasing Methodology and any site specific information.
 2. Site types of reserved matters will defer to the number of dwellings included within the reserved matters rather than the number of dwellings within the outline permission.
 3. Consideration will be given to conditions which need discharging, significant mitigation measures which need implementing and requirements of S106 and S278 agreements, which are required prior to commencement. Where appropriate an additional year may be identified in the lead-in times between decision and completion if the number of conditions is extensive and / or complex, or there are substantial lead-in times for the mitigation measures, S106 or S278 agreements which could delay development.
 4. Both engagement and national studies showed very little difference in overall lead in times and delivery rates between greenfield and brownfield site typologies, this is reflected in the phasing, and accordingly the assumptions cover both types of site.
 5. If a demolition is included within the proposal that demolition would be in Year 1 and construction/completion of the dwellings in Year 2 (or at least initial completions for larger sites).
 6. For any conversions from dwellings to flats or subdivisions, losses will be recorded the same year as gains within the phasing.

7. Nutrient neutrality required in relation to adverse effects on Stodmarsh protected sites has the potential to affect some sites:
- Lead-in times will not be affected for any application with a detailed planning permission or outside the catchment area.
 - Sites of over 300 dwellings will be expected to provide specific mitigation measures. Where these measures include a development not connecting to a main sewer and therefore needing a permit, an additional year between granting permission and first completions will be added to the phasing⁶. Other potential mitigation measures are not expected to change lead-in times.
 - Other allocated and draft allocated sites which are required to demonstrate nutrient neutrality may require a further year at no or limited activity stages before submitting a planning application to identify a mitigation strategy. This will be assessed on a site by site basis and take into consideration any district or catchment-wide strategies that may be available at the time.
 - At such a time as a district or catchment-wide strategy is adopted lead-in times will return to the normal assumptions.

Small sites (9 or less dwellings)

- 3.7. Sites of 10 or more dwellings are considered 'major development' within the NPPF and as such are likely to have more infrastructure requirements, like affordable housing. Based on this, analysis of local site lead-in times and feedback from the development industry the 'small sites' typology has been changed from less than 5 dwellings to 9 or less dwellings.
- 3.8. In the case of small sites (9 or less dwellings), completion is generally assumed to be within the five year period with the development fully constructed within one or two years.
- 3.9. Outline permission granted or under consideration is phased in Year 3 as this allows a year for reserved matters to be submitted and decided, and a year or two for construction to be completed.
- 3.10. These lead-in times are considered cautious by the council as local analysis has shown that once detailed permission is submitted, permission and completion can all occur within one year. To be precautionary an extra year has been included in the phasing of sites with outline permission pending decision and detailed permission pending decision or granted but with no on-site works having started.

⁶ Where a site falls under this situation **and** point 3 about complex conditions/legal agreements also applies, only 1 additional year will be added between granting permission and first completions as it is assumed that both can be dealt with simultaneously.

- 3.11. Small sites with planning permission will be phased prior to their expiration date. If clear evidence from site surveys or other means demonstrates that any form of demolition or construction will not be implemented prior to the expiry date of the planning permission then the site may be removed from the 5yr supply.

Table 2: Small Sites (9 or less dwellings) Phasing Assumptions

Sites stage	Yr Initial Completions Expected				
	Year 1	Year 2	Year 3	Year 4	Year 5
Detailed planning permission granted - demolition occurred / site under construction	✓				
<ul style="list-style-type: none"> • Detailed planning permission granted - no on-site works commenced; or • Detailed planning permission pending decision 		✓			
<ul style="list-style-type: none"> • Outline permission granted; or • Outline permission under consideration 			✓		
<ul style="list-style-type: none"> • Limited planning activity; or • No planning activity 				✓	

Smaller sites (10 - 99 dwellings)

- 3.12. Sites of 10 or more dwellings are considered 'major development' within the NPPF and as such are likely to have more infrastructure requirements, like affordable housing. Based on this, analysis of local site lead-in times and feedback from the development industry the 'small sites' typology has been changed from less than 5 dwellings to 9 or less dwellings, meaning the 'smaller sites' typology has been changed to 10-99 dwellings.
- 3.13. In the case of smaller sites, completion is generally assumed to be within the five year period, with first completions normally occurring two or three years after detailed permission being granted.
- 3.14. The lead-in times below are aligned with Start to Finish 2020. Outline permission under consideration is phased in Year 4 which allows some buffer as the Start to Finish document shows sites of 50-99 dwellings take on average 3.3 years from submission of an outline application to first completion.

- 3.15. Local lead-in times are evenly split between Year 1 and Year 2 for first completions once a detailed planning permission is granted. So as a cautious approach the phasing assumptions below show detailed planning permission in Year 2.

Table 3: Smaller Sites (10 - 99 dwellings) Phasing Assumptions

Sites stage	Yr Initial Completions Expected				
	Year 1	Year 2	Year 3	Year 4	Year 5
Detailed planning permission granted - demolition occurred / site under construction	✓				
<ul style="list-style-type: none"> • Detailed planning permission granted - no on-site works commenced; or • Detailed planning permission pending decision 		✓			
Outline permission granted			✓		
<ul style="list-style-type: none"> • Outline permission under consideration • Limited planning activity suggesting a detailed planning permission 				✓	
<ul style="list-style-type: none"> • Limited planning activity suggesting an outline planning permission; or • No planning activity 					✓

Medium Sites (100 - 499 dwellings)

- 3.16. Start to Finish 2020 identifies that sites of 100-499 dwellings take on average 4 years from submission to first completions and this is reflected by outline planning applications under consideration being phased in Year 4.
- 3.17. Hybrid applications, with the detailed element containing a number of new dwellings, are likely to come forward quicker once granted as a reserved matter application is not needed before construction can start.
- 3.18. Sites with no form of consent will potentially be phased outside of the 5 year period but may be included within Year 5 depending on if any planning activity is occurring (e.g. pre-application discussion or EIA scoping application) and any other clear evidence of intention to develop is provided by the developer/housebuilder (such as through a Statement of Common Ground).

Table 4: Medium Sites (100 - 499 dwellings) Phasing Assumptions

Sites stage	Yr Initial Completions Expected					
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Detailed planning permission granted - site under construction	✓					
Detailed planning permission granted - no on-site works commenced		✓				
<ul style="list-style-type: none"> • Detailed planning permission pending decision; or • Outline permission granted 			✓			
Outline permission under consideration				✓		
Limited planning activity					✓	
No planning activity						✓

Large Sites (500 - 1,999 dwellings)

- 3.19. Sites of over 500 dwellings will be most of the strategic sites contained within the Canterbury District Local Plan (adopted and draft). Past experience of planning consents, nationally and locally, has shown that sites above 500 dwellings almost always secure outline consents followed by reserved matter applications for phases or parcels of land within the site.
- 3.20. Recently the council is receiving more hybrid applications for sites of a strategic size and encourages this. Hybrid applications include detailed permission for a proportion of the housing units and the remainder of the allocation covered by the outline part of the consent.
- 3.21. Hybrid applications are likely to come forward quicker once granted as a reserved matter application is not needed before construction can start.
- 3.22. If an Outline permission has been granted then sites will generally be phased in Year 3, unless any transfer to a house builder is required then the site may be phased in Year 4.
- 3.23. At a local level outline permissions for proposals of this size usually take 2 years to be determined. Depending on how long the application has been under consideration first completions can either be anticipated in Year 4 or 5.

- 3.24. Sites of this size are encouraged to undergo pre-application advice prior to submitting a planning application. Therefore when a site is submitted to the council for determination many of the issues should already have been addressed so first completions can be anticipated in Year 5. Should a committee or decision date be confirmed in the near future, or based on the known progress and discussions with case officers, the site may be phased in Year 4 (or Year 3 for a hybrid application).

Table 5: Large Sites (500 - 1,999 dwellings) Phasing Assumptions

Sites stage	Yr Initial Completions Expected						
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Detailed planning permission granted - site under construction	✓						
Detailed planning permission granted - no works on site		✓					
Outline permission granted			✓				
Outline permission under consideration					✓		
Limited planning activity						✓	
No planning activity							✓

Super Sized Sites (2000+ dwellings)

- 3.25. Delivery on super sized sites can be remarkably quick; from outline permission being granted to on-site works, this is because most of the difficult issues are resolved during the planning approval period or via a master plan process.
- 3.26. Therefore, reserved matters stage to first completions is considerably quicker than smaller sites. Start to Finish 2020 identified this takes a mean of 2.9 years. Completions for an outline granted planning permission is phased in Year 3 to reflect the national studies. This will predominantly be the case unless a transfer to a house builder is required then the site may be phased in Year 4.
- 3.27. Hybrid applications are likely to come forward quicker once granted as a reserved matter application is not needed before construction can start.

- 3.28. Sites of this size are encouraged to undergo pre-application advice prior to submitting a planning application. Therefore when a site is submitted to the council for determination many of the issues should already have been addressed so first completions can be anticipated in Year 5. Should a committee or decision date be confirmed in the near future, or the council believes that the majority of issues are resolved, the site may be phased in Year 4 (or Year 3 for a hybrid application).
- 3.29. Draft or allocated Local Plan sites which have planning activity, such as pre-applications discussions, but have not submitted as planning application will not generally be phased within the 5 year period unless there are exceptional circumstances.
- 3.30. Draft or allocated Local Plan sites with no planning activity will be phased in Year 8 to reflect the amount of community engagement and preparation required to submit a planning application for a site this size.

Table 6: Super Size Sites (+2000 dwellings) Phasing Assumptions

Sites stage	Yr Initial Completions Expected							
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8
Hybrid permission ⁷ granted		✓						
Outline permission granted			✓					
<ul style="list-style-type: none"> ● Hybrid permission under consideration ● Outline permission under consideration 					✓			
Limited planning activity						✓		
No planning activity								✓

⁷ Detailed element of the planning permission must include a number of new dwellings.

4. Build Out Rates

- 4.1. There is a direct correlation between the strength of a housing market in a particular area and the levels of new homes delivered. In this context Canterbury District has a strong housing market.
- 4.2. National studies have shown that where 30% or above affordable housing is proposed on a site that build rates are at the higher end of national average. The Local Plan requires sites to provide 30% affordable housing which translates into strong build out rates.
- 4.3. National studies identify many urban extensions in the south of England where recent delivery rates have been substantially in excess of the 120 units per annum.
- 4.4. While many of the strategic sites with planning permission were only granted recently and are not at the stage to be delivering at 'full speed', an excess of 100 units per annum has been seen across two years. Therefore, it is reasonable to assume that high build-out rates can be achieved, and should be expected, within the district.
- 4.5. Sites which are over 1,000 dwellings (Large and Super Size sites within the assumptions) will likely experience delivery in peaks and troughs. This means that some years during the life span of the development will have high levels of completions and some years will be lower, this is likely to be dependent on the number of outlets and the stage at which any reserved matters applications are at. This will be assessed on a site by site basis, based on the stage of planning applications, officer information and developer engagement.
- 4.6. Analysis of national and local evidence was reviewed alongside the key outcomes of the Housing Delivery Group engagement. This has resulted in specifically derived build out rates for the district which are set out below (Table 7).

Table 7: Build Out Rates

Site Size	Potential average annual yield	Notes
Small Sites (9 or less dwellings)	N/A	All to be delivered in one year
Smaller Sites (10 - 99 dwellings)	30	Up to 60 for sites at the higher end, with lots of affordable housing and / or multiple outlets.

Medium Sites (100 - 499 dwellings)	80	Closer to 50 for smaller sites and up to 130 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
Large Sites (500 - 999 dwellings)	100	Up to 150 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
Large Sites (1,000 - 1,999 dwellings)	120	Up to 180 for sites at the higher end, with lots of affordable housing and / or multiple outlets.
Super Size Sites (+2000 dwellings)	160	Up to 300 for sites at the higher end, with lots of affordable housing and / or multiple outlets.

- 4.7. Most sites will have lower completions for the first, and potentially second year, until the site is fully 'up-to-speed' at which point the numbers of dwellings built each year tends to stabilise.
- 4.8. To account for the stepped delivery the general assumptions for the first year of completions will be:
- 'large' and 'super sized' sites will be around 50 dwellings,
 - 'medium' sites will be around 20 dwellings; and
 - 'smaller' and 'small' sites will be around 10 dwellings.
- 4.9. There can sometimes be a tail off for the last few dwellings in the final year of the site's lifespan. This will be assessed on a site by site basis, and where appropriate implemented.
- 4.10. Direct information on the number of housebuilders involved in a particular site and number of outlets will be sought. Where this information cannot be obtained it is generally assumed that sites up to 500 dwellings will be developed by a single housebuilder and general outlet assumptions will be made; such as sites of over 500 dwellings will potentially have 2 or 3 outlets, and for sites in excess of 1,000 dwellings there would potentially be 3 or 4 outlets.
- 4.11. Schemes for flats will all be phased within one year as it is unlikely that only part of a building could be occupied while the rest of it is under construction. This has the potential to result in peaks and troughs.
- 4.12. These reflect the build out rates currently being supplied directly from developers and housebuilders, they are also within the ranges of site delivery levels analysed in national studies and local data.

- 4.13. The build out rate on any particular site will be affected not only by its exact yield but other indicators such as the amount of affordable housing and whether any part of the site is to be delivered alongside the mainstream housing e.g. flatted development or older person accommodation.
- 4.14. Direct information will always be sought. The assumptions and locally identified build out rates in this document have been developed and tested with delivery stakeholders as part of the council's ongoing dialog on housing delivery. Therefore, where direct information is not made available the council considers the delivery rates identified are appropriate and will be used when phasing sites build out rates.

5. Conclusions

- 5.1. The council considers that the phasing methodology in combination with the analysis of direct information and other delivery indicators sets out the 'clear evidence' needed to assess housing delivery within the five year period.
- 5.2. The council has been proactive in engaging with developers and those involved in housing delivery in the district, making use of the expert knowledge of the Housing Delivery Group. The group has played a key role in the development of the local evidence and assumptions around the lead-in times and build out rates for a range of sites reflective of those coming forward in the local housing market.
- 5.3. As well as direct information the council has also assessed local and national data on lead-in times and build-out rates, and the implications of other known delivery factors, such as progress of planning applications and any secured infrastructure funding.
- 5.4. This document has undergone consultation with the Housing Delivery Group and has been tested and amended to reflect the views captured. The council considers the phasing methodology to be a robust evidence base.
- 5.5. The assumptions presented are a product of engagement with delivery stakeholders and have some synergy with those found in national studies where delivery conditions mirror those found in Canterbury District. It is anticipated that housing delivery in the district will be quicker than many parts of the country and therefore towards the shorter lead-in times found in national studies.
- 5.6. The assumptions detailed in this document are considered to be reflective of the local housing market. It is also possible that some sites within the land supply will be the subject of extenuating circumstances which mean that delivery is either accelerated or unexpectedly delayed. Accordingly the methodology enables a degree of flexibility as there may be specific reasons when the council deems it necessary to depart from the methodology.