

**Forest Heath District Council
Assessment of a five year supply of housing land
taking a baseline date of 31 March 2017**

**The five years covered in this assessment are
1 April 2017 to 31 March 2022**



Forest Heath
District Council

Published 24th July 2017

1. Introduction

- 1.1 National Planning Policy Framework (March 2012) requires Local Planning Authorities to identify and maintain a 5 year land supply of deliverable land for housing. The assessment of land supply will be updated annually. If any significant land supply changes occur during this time, further updates may be prepared and made available on the website.
- 1.2 This report sets out the availability of housing land supply for the period 2017-2022. It takes a baseline of 31 March 2017. The previous 5 year supply (Dec 2016) took a 'year forward approach' and estimated completions from existing commitments for 2016-17, this approach is not being used in this report. Instead, the assessment uses the known completions as at 31 March 2017 and then assesses the 5 year forward supply from that same time point.

Background

- 1.3 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking (NPPF, para14).
- 1.4 Local Plans should set out the policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable the continuous delivery of housing for at least 15 years from the date of adoption of the plan. Sufficient, specific deliverable sites or broad locations for growth should be identified to deliver housing in the first five years, with a further supply of specific, developable sites for years 6-10 and, where possible for years 11-15.
- 1.5 The Forest Heath Local Plan includes the Core Strategy adopted 2010. Policy CS1 provides the settlement hierarchy for Forest Heath, giving a broad indication of the scale of growth appropriate to each settlement in order to promote sustainable development. The Forest Heath Core Strategy Single Issue Review reconsiders Policy CS7 (the part of the Local Plan that was quashed), the overall amount of residential development and the distribution of housing growth throughout the district.
- 1.6 The Site Specific Allocations Local Plan identifies which sites should be developed, in order to achieve the vision and objectives of the Core Strategy. It includes proposals for new housing, employment, shopping and other development, together with other uses of land such as parks and open spaces. The plan identifies specific sites that will enable a continuous delivery of housing for at least 15 years from the date of adoption.
- 1.7 NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites. The SHLAA provides evidence of sites and broad locations that are sustainable (referenced as 'included') and unsustainable (referenced as 'deferred').

1.8 For sites to be considered deliverable, National Planning Policy Framework states they should be:

- **Available**- the site is available now.
- **Suitable and Achievable** - the location for development now is suitable and can be achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable.

1.9 Potential sites include those allocated for housing within the local plan, those with planning permission, and any known specific unallocated sites with potential to make a contribution to housing delivery during the 5 year period.

1.10 On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the National Planning Practice Guidance (NPPG). It states under section on Housing and Economic Land Availability Assessment paragraph 29;

'Assessing the suitability, availability and achievability (including the economic viability of a site) will provide the information as to whether a site can be considered deliverable, developable or not currently developable for housing. The definition of 'deliverability' and 'developability' in relation to housing supply is set out in footnote 11 and footnote 12 of the National Planning Policy Framework'.

1.11 Paragraph 31 of the NPPG states;

'Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five year.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply'.

Calculating the Housing Need

- 1.12 Forest Heath District Council is producing a Single Issue Review (Core Strategy policy CS7) of its housing figures to establish new housing growth targets. For the period 2001 to 2011 the adopted Core Strategy sets the requirement of 3,200 dwellings (320 per annum).
- 1.13 The Cambridge Sub-Region's Strategic Housing Market Assessment update (SHMA), published June 2013 took a base date of 2011 and made a fresh assessment of housing needs in the district. The SMHA assessed the full, objectively-assessed housing need in Forest Heath between 2011 and 2031 at 7,000 dwellings. Using 2011 census data as the starting point for an assessment of future housing demand by reference to the existing households plus household formations from the census data onwards meant that there was no additional backlog of demand for housing from the period between 2001 to 2011 above and beyond the dwellings figures presented in the SHMA.
- 1.14 Combining the Core Strategy requirement for 2001 to 2011 with the SHMA from 2011 to 2031 would give an overall requirement of 10,200 dwellings for the period 2001 to 2031 (3,200 dwellings for period 2001 to 2011 and 7,000 dwellings for the period 2011 to 2031). However, the SHMA update takes a fresh assessment of the housing need at the base date of 2011 based on more up-to-date evidence than that which informed the Core Strategy. Moving forward, it is therefore not necessary for housing supply to make any allowance for past under-delivery prior to 2011. This report therefore assesses the position from the base date of 2011.
- 1.15 The Strategic Housing Market Assessment (SHMA) for Forest Heath was updated in January 2016, setting a need of 6,800 dwellings in the period 2011 to 2031. The study was supported by evidence prepared by Peter Brett Associates which assessed market signals. This objectively assessed need (OAN) forms the basis for a five year supply calculation. A further update was undertaken in August 2016, assessing what adjustment, if any, was needed following the release of new CLG household projections and EEFM forecasts since January 2016. This concluded the identified future quantity of housing needed requires no adjustment. The objectively assessed housing need is therefore 6,800 dwellings for 2011-2031.

Forest Heath Five Year Housing Requirement

a. SHMA (published 2016) 2011-2031 6,800 (340pa)	6,800
b. Actual net dwelling completions 2011 - 2017	1,655
c. Residual requirement 2017 - 2031 (a-b)	5,145
d. Annual requirement (a/20)	340
e. 5 year requirement (d x 5)	1,700
f. Under delivery since 2011, against requirement of 340 dw pa	385
5 year requirement and shortfall including 5% buffer ((e + f) + 5%)	2,189

2. Five Year Housing Supply

- 2.1 As at 31 March 2017 a total of 1,655 dwellings have been completed since 2011. In order to meet the 6,800 dwelling requirement an additional 5,145 will need to be built in the 15 years from April 2017 to March 2031 (financial calendar period).
- 2.2 This assessment of supply includes sites completed and those with planning permission at 31 March 2017. A housing trajectory is included (appendix A) illustrating which sites will contribute to the five year supply and the provision for the remainder of plan period up to 2031.
- 2.3 Sites proposed in the submission (reg 19) Site Allocation Local Plan (SALP) have been included in the 5 year supply where they are considered to be achievable in this timeframe. These include sites currently subject of a planning application or pre-application discussions have taken place. A pragmatic view has been taken on likely delivery timescale reflecting the status of the planning application, planning conditions and s106 agreements to address infrastructure constraints and some discussion with developers.
- 2.4 The NPPF gives clear guidance that 'Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years', (footnote 11, page 12). For Forest Heath's 5 year supply report all sites with planning permission have been included within the first five years supply. Thereafter the housing trajectory takes a reasonable windfall allowance of 25 units per annum. This windfall allowance reflects a realistic assumption of sites likely to come forward, allowing for some to lapse.
- 2.5 The remaining Local Plan (1995) allocations without planning permission have been excluded due to uncertainty with deliverability.
- 2.6 In calculating the 5 year supply the NPPG at paragraph 035 states 'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible'. However as the SHMA (2016) sets out a fresh assessment of current housing need, based on more up-to-date evidence than that which informed the Core Strategy, it is therefore not considered necessary for the housing supply to make any allowance for past under-delivery before 2011. This approach is consistent with that used in St Edmundsbury which the Inspector into the examination of the Vision 2031 Local Plan considered appropriate. The Forest Heath's emerging Site Allocations Local Plan plans to meet the full objectively assessed housing need in the district to 2031.
- 2.7 The record of housing completions over the last 10 years from 2007 to 2017 show 5 years of over delivery and 5 years of under delivery against the housing target. In the monitoring period 2016 to 2017 housing completions (344) satisfied the OAN target of 340 dwellings. It is therefore not considered to show persistent under delivery. A 20% buffer is not considered appropriate as provision in the past 10 years does not

constitute persistent under delivery when measured against the circa 65% (two thirds of the monitoring years) used in the Local Plans Experts Group recommendations, and the most recent performance, with completions achieving the requirement, indicates that under delivery is not persistent or persisting. A 5% buffer is thereby considered appropriate. This is consistent with the approach taken by the inspector in her decision letter into the Broom Road, Lakenheath dated 5th July 2017 (APP/H3510/W/16/3149242) where she recommended a 5% buffer should be applied.

- 2.8 No lapse rate has been applied. The inspector in the Meddler Stud decision (APP/H3510/W/15/3070064) concluded there was no evidence provided to justify the use of a 10% lapse rate. It should also be noted that the Council has not included any allowance for windfall sites in its 5 year supply, whereas in reality some windfalls will arise. This provides an additional comfort that the supply will be achieved. The inspector in the Broom road decision letter para 55 concurred with this approach.

Five Year Deliverable Housing Supply

Identified Sites	As at April 2017
Outstanding Unimplemented planning permissions (large)* (see grey boxes in housing trajectory)	1254
Outstanding Unimplemented planning permissions (small)** (see grey boxes in housing trajectory)	269
Remaining allocations in Local Plan	0
Submission SALP sites some of which have a resolution to approve, some are currently the subject of the planning application, for each site there is evidence of deliverability in a 5 year period. (See grey boxes in the housing trajectory).	1401
Total supply	2924

* Larger sites = 10 or more homes, as listed in trajectory

** Small sites = under 10 homes, as listed in appendix B

Five year deliverable housing supply	April 2017 – March 2022
<i>Annual Average requirement</i>	340
5 Year Identified Supply	2924
Five year supply addressing unmet supply since 2011 (Sedgefield approach)	
Shortfall units 2011-2017	385
Equates to 2924/438 including shortfall and 5% buffer	6.7 year supply

2.9 The NPPF states council's should aim to where possible, deal with under supply within the first 5 years of the plan period. In addressing the undersupply of 385 units since 2011, the housing land supply is 6.7 years including a 5% buffer (Sedgefield approach). A 5% buffer has also been applied to the shortfall.

3. **Monitoring and maintaining the Five Year Supply**

3.1 The council will monitor the five year supply of deliverable sites on an annual basis linked to the Monitoring Report. The assessment of land supply will be updated annually. If any significant land supply changes occur during this time further updates may be prepared and made available on the website.

3.2 Forest Heath has a 6.7 year supply of housing land including a 5% buffer, when addressing the under supply in the first five years (Sedgefield approach).

Appendix B

Small sites with planning permission at 31st March 2017

Planning Application reference numbers	Parish/Town	Address	Net dwelling gain
DC/14/1710/FUL	Brandon	The Old Fire Station, London Road	1
DC/15/1719/FUL	Brandon	Land rear of Rattlers Road	1
DC/13/0740/FUL	Brandon	High Street, rear of 15	1
DC/16/0948/FUL	Brandon	32-34 High Street	1
DC/16/1250/FUL	Brandon	183 London Road	1
DC/16/0906/FUL	Brandon	Rattlers Road, 59 (known as Holly, 59c Rattlers Road)	1
DC/16/2415/FUL	Brandon	Lode Street, 11b	-1
DC/16/2774/FUL	Brandon	25 Church Road	2
DC/16/2737/FUL	Brandon	83 London Road	1
DC/15/1430/FUL	Brandon	Church Road, land between 23 & 25	2
DC/15/1395/FUL	Brandon	Edmund Road, 1	1
F/2011/0304/RMA F/2008/0260/OUT	Mildenhall	North Terrace, Breck Gardens Land rear of 14	8
F/2011/0430/EOT F/2008/0579/FUL F/2007/1008/FUL	Mildenhall	North Terrace, Breck Lodge	2
DC/15/2396/FUL	Mildenhall	Second Floor, Breckland House, 8 Churchyard	1
DC/15/0074/RM F/2012/0259/OUT	Mildenhall	North Terrace, Land to Rear of 8	8
DC/16/1038/P3JPA	Mildenhall	5 King Street	1
DC/16/1109/FUL	Mildenhall	land adj 41 Robin Close	6
DC/15/1876/FUL	Mildenhall	High Street, 16 (Old Bakery Lane)	7
DC/16/1204/FUL	Mildenhall	High Street, 16 (Old Bakery Lane)	3
F/2007/0292/FUL	Newmarket	Bury Road, 35 - Freemason Lodge	1
F/2012/0404/FUL	Newmarket	Old Station Road, Machell Place	1
DC/13/0191/P3JPA	Newmarket	Exeter Road, 16 Clock Tower Mews	1
DC/14/0786/FUL	Newmarket	Exeter Road, 4	9
DC/14/1139/FUL	Newmarket	Vicarage Road, Ruscote House	2
DC/14/0378/P3JPA	Newmarket	Kingston Passage, 6 (known as 5 Kingston Passage)	1
DC/15/2296/FUL	Newmarket	Wellington Street, St Aubyns	1
DC/15/2321/OUT	Newmarket	The White Lion, 216 High Street	7
DC/15/2287/OUT	Newmarket	182 Exning Road	5
DC/15/0354/P3JPA	Newmarket	High Street, 22-24	3
DC/13/0158/FUL	Newmarket	Cricket Field Road, land off	1
DC/16/1028/FUL	Newmarket	Revida Place, Hamilton Road	2
DC/16/1453/FUL	Newmarket	Cheveley Road, 3	1
DC/15/2294/FUL	Newmarket	Targa Cottage, 24 Cheveley Road	2
DC/16/1856/FUL	Newmarket	Balham Villas, Granby Street	1
DC/16/2215/FUL	Newmarket	garages to rear of 29 Old Station Road	3
DC/16/2057/OUT	Newmarket	land at George Lambton Avenue	4
DC/16/2273/FUL	Newmarket	Freshfields, 74	1
DC/17/0234/FUL	Newmarket	Raylands, Rayes Lane	1
DC/14/2418/FUL	Newmarket	Southfield Farm Cottages, Hamilton Road	3
DC/15/0646/FUL	Newmarket	Exeter Road, 46, Waterwitch House 3rd Floor	5
DC/15/0785/FUL	Newmarket	King Edward VII Road, 39	2
DC/15/2040/FUL	Newmarket	Cheveley Road, 3	1
F/2009/0456/FUL F/2004/0485/FUL	Lakenheath	Hall Drive, Lakenheath Hall	2
F/2012/0382/FUL F/2003/0275/CAC	Lakenheath	Back Street, former Lime Tree Bungalow	1
F/2013/0210/FUL	Lakenheath	Anchor Lane, 12 (known as The Laurels)	1
DC/14/1140/FUL	Lakenheath	High Street, 107	1
DC/14/2430/OUT	Lakenheath	Wings Road, 5	1
DC/15/1666/FUL	Lakenheath	The Lakenheath Village Home, 7 Back Street	4
DC/16/2265/FUL DC/15/0545/OUT	Lakenheath	Eriswell Road, 27, Pleasant View	7
DC/16/0430/FUL	Lakenheath	Station Road, garden of 42	1
DC/16/0523/FUL	Lakenheath	16 High Street	1
DC/16/1233/FUL	Lakenheath	Eriswell Road, 37	1
DC/16/1820/FUL	Lakenheath	rear of 29 High Street	1
DC/15/2504/FUL	Red Lodge	Greenhays Farm, Green Land	1
DC/16/1188/OUT	Red Lodge	Turnpike Road, 66	3
DC/16/2028/FUL	Red Lodge	8 Warren Road	4
DC/17/0181/FUL	Red Lodge	10 Turnpike Lane	4
DC/14/0263/FUL	Red Lodge	Turnpike Lane, rear of 12	1
DC/15/1685/FUL F/2011/0351/FUL F/2006/0328/OUT	Beck Row	The Street, Land adj to Kings Head	4
DC/16/0423/RM DC/15/0321/OUT	Beck Row	Land east of Aspal Lane	5
F/2013/0342/FUL	Beck Row	St Johns Street, Endobec	1
DC/17/0346/FUL DC/13/0283/OUT	Beck Row	land to the rear of 70-72 Holmsey Green	1
DC/14/2293/FUL	Beck Row	Stock Corner, The Chestnuts	5
DC/15/0265/FUL	Beck Row	Holmsey Green, 30	1
DC/16/0391/FUL	Beck Row	land adjacent Endobec, St Johns Street	1
DC/16/0184/FUL	Beck Row	land to rear of 83-91 Holmsey Green	3
DC/16/0436/HYB	Beck Row	Medway, I The Grove	7

Planning Application reference numbers	Parish/Town	Address	Net dwelling gain
DC/15/0070/OUT	Beck Row	Rolfes Coal Yard, Wilde Street	8
DC/15/0864/FUL	Beck Row	Land at Breach Drove	3
DC/16/2348/FUL	Beck Row	Plot 1, Hern Villa, 56 Holmsey Green	1
DC/17/0070/FUL	Beck Row	30 Holmsey Green	2
DC/14/2380/FUL	Beck Row	Holmsey Green Gardens, 18	1
DC/15/1344/FUL	Beck Row	land to front of 26c The Street, Holywell Row	1
DC/15/1030/FUL	Beck Row	West Suffolk Golf Centre, New Road	1
DC/16/1054/OUT F/2013/0124/EOT F/2010/0184/EOT F/2007/0358/OUT	Exning	Laceys Lane, adj 50	2
DC/16/0356/FUL	Exning	Chapel Street, Methodist Church	2
DC/16/0810/FUL	Exning	29 Oxford Street	-1
DC/15/1863/FUL	Exning	Highlands, 2, land north of	1
DC/15/1494/OUT	Exning	The Highlands, 6	1
F/2008/0573/RMA F/2002/563	Kentford	Knappett Roofing Depot, Bury Road	5
DC/16/0179/FUL	Kentford	development site, Gazeley Road	2
DC/14/1178/FUL	Kentford	Moorland Stud, Herringswell Road	2
DC/16/1922/FUL	Kentford	Bury Road, The Greenhouse	5
DC/16/2723/OUT	Kentford	Village Hall	2
DC/13/0569/FUL	West Row	Fodderfen Drove, Fodderfen Pumping Station	1
DC/15/1366/FUL DC/14/1492/OUT	West Row	Green Farm Buildings (Peachey's Flowers)	2
DC/15/2092/FUL F/2013/0032/FUL	West Row	land to rear of 5 Beeches Road	2
DC/13/0122/FUL	West Row	Eldo Road, 112	1
DC/17/0298/FUL DC/15/2088/FUL	West Row	Greenleas Farm, The Green	1
DC/16/1712/FUL F/2013/0262/FUL	West Row	Friday Street, 60	1
DC/16/2671/RM DC/14/2407/OUT F/2013/0329/OUT	West Row	Park Garden, adj 1 & 2	7
DC/16/2414/FUL DC/13/0370/FUL	West Row	Stirling Close, 11 (fronting Church Road	1
DC/16/1615/PMBPA	West Row	Barn, Pott Hall Road	1
DC/16/1935/PMBPA	West Row	The Green, Green Farm Buildings	1
DC/16/1571//OUT	West Row	land at Manor Farm Road	5
DC/16/2183/OUT	West Row	Land adj to Popes Farm, Pamments Lane	1
DC/14/2120/RM DC/14/0633/OUT	Worlington	Freckenham Road, land at 15	1
DC/16/1965/FUL DC/13/0830/FUL	Freckenham	Church Lane, Glebe Cottage	-1
DC/14/0936/FUL	Kenny Hill	Harlequin Farm, Mildenhall Drove	1
DC/14/0035/FUL	Gazeley	Manor Farm Courtyard, The Street	4
DC/15/0225/FUL	Barton Mills	Development site, Bridge Farm Close, Barton Mills	3
DC/15/0692/FUL	Gazeley	The Chequers Inn, The Green	1
F/2011/0260/FUL	Icklingham	land to rear of 12 The Street	1
DC/15/1978/FUL	Gazeley	The Street, land rear of 12	1
DC/15/2416/FUL	Tuddenham	Land adjacent 11 High Street	1
DC/15/1928/FUL	Barton Mills	Plot 4 Sandfords Nursery, Newmarket Road (known as	1
DC/16/1561/FUL DC/14/1335/FUL	Gazeley	Former Sperrinks Nursery	2
DC/15/1384/PMBPA	Tuddenham	Icklingham Road, Longwood Farm	1
DC/16/1289/FUL	Kenny Hill	Starvegut Hall Farm, Mildenhall Drove	1
DC/16/1145/FUL DC/14/0527/OUT	Gazeley	The Street, 50	3
DC/16/0971/HH	Kenny Hill	Crow Ground Farm, Mildenhall Drove	1
DC/16/1284/P3JPA	Worlington	building behind 21 Mildenhall Road	1
DC/16/1049/OUT	Holywell Row	The Street, 16, Southacre	1
DC/16/0576/PMBPA	Sedge Fen	Barn, Eau Farm	1
DC/16/0459/OUT	Tuddenham	Village Hall	2
DC/16/1084/FUL	Kenny Hill	Birchwood Farm, Skeltons Drove	1
DC/16/1871/FUL	Barton Mills	The Street, 35	1
DC/16/2514/OUT	Worlington	land adjacent to Zealandia, Church Lane	1
DC/17/0091/P3JPA	Herringswell	Park Farm Offices, Park Farm Drive	1
DC/17/0208/FUL	Icklingham	land adj 45 to 47 The Street	1
DC/16/1726/OUT	Moulton	Jeddah Way	4
DC/16/0185/RM DC/15/1454/OUT	Freckenham	Fordham Road, Homefields	1
DC/16/1088/FUL	Eriswell	Zone 4 Plot 5 Chestnut Way RAF Lakenheath	1
DC/16/1089/FUL	Eriswell	Zone 4 Plot 10 Redwood Lane RAF Lakenheath	1
DC/16/1090/FUL	Eriswell	Plot 3 Apple Close RAF Lakenheath	1
DC/15/1402/PMBPA	Barton Mills	Newmarket Road, Belle Vue	1
			269