



WhatHouse? Housebuilder of the Year

**WRITTEN
STATEMENT**

MATTER 5

Forest Heath District
Council

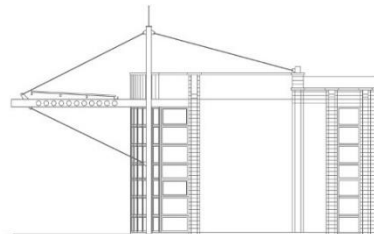
SIR Examination

September 2017

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1.0 This document is intended to set out additional information on which we will rely when we attend the Examination of the FHDC SIR.

2.0 In response to:

5.1 Appendix C of the Single Issue Review document sets out the housing trajectory. Is the trajectory a reasonable and realistic projection of housing delivery?

- i. We do not believe there is a realistic prospect of delivering 1,300 homes on site SA4, land West of Mildenhall.
- ii. Site allocation SA4 proposes the delivery of 97 hectares of development for '*Mixed use to include 1300 dwellings with a local centre, a minimum of 5ha employment, schools, leisure facilities and public services*'. It is unrealistic and unachievable to deliver 1,300 houses on this site by 2031 along with the other infrastructure proposed. There is no trajectory to demonstrate how the Council expects the site to be delivered. The site does not currently have planning permission nor has an application been submitted.
- iii. Major developments of this type taking significant time to plan, design and deliver. The approach set out is simply overoptimistic.
- iv. Strategic schemes take significant time and resources to deliver. Annex 1 includes details of strategic schemes that have come forward in southern Cambridgeshire and West Suffolk in recent years. The data demonstrates how long it takes to deliver such schemes through the planning system. The quickest time from submission of an application to the occupation of homes is Cambridge University's North West campus – a time of 4 ½ years. It is worth considering in more detail the applications in West Suffolk as they will be determining any application for west of Mildenhall.
- v. The North West Bury St Edmunds urban extension of 1,070 homes was identified in the St Edmundsbury Core Strategy, adopted December 2010. A hybrid application was submitted in July 2013, was subject of a resolution to grant in January 2014, and the decision issued in October 2014. Reserved Matters for strategic infrastructure were approved in February 2016. A series of applications were made to discharge pre-commencement conditions – the first of which took a year from receipt to being discharged. Altogether, it took six years from local plan adoption to start on site. No homes have yet been completed, 4 years and 2 months after the application was submitted.

- vi. At South East Bury St Edmunds, an urban extension of c1,200 homes was also identified in the St Edmundsbury Core Strategy, adopted December 2010. An outline application was submitted in December 2015 and was subject of a resolution to grant in January 2017. The decision has not yet been issued.
- vii. At North East Haverhill an application was submitted in October 2015 by Hallam. That application remains undetermined 23 months later.
- viii. In our view a more realistic delivery trajectory for West of Mildenhall would be:
 - a. Adoption, say March 2018
 - b. Application, December 2018
 - c. Resolution, June 2019
 - d. Decision notice issued March 2020
 - e. Reserved Matters submission, September 2020
 - f. RM approval, January 2021
 - g. Conditions discharged to enable start on site July 2021
 - h. Strategic infrastructure works – one year – July 2022
 - i. Start building homes, July 2023
 - j. First homes ready for occupation, July 2024
- ix. The delivery trajectory assumes that 100 homes can be delivered in year 1 at Mildenhall West. That suggests at least 2 house builders operating in tandem on the site. It also means that infrastructure needs to be installed to enable at least 2 phases to be opened up, which is likely to increase the length of time before housebuilders can begin work. In our view, the market at Mildenhall might sustain one market sale every 2 weeks per developer, around c25-30 per year. With affordable housing added, the maximum delivery from a single outlet would be c40-45 homes a year. Realistically, 25 homes might be delivered in monitoring year 2024/25. With a second housebuilder then coming on stream in 2025/26 delivery might rise to c85 dwellings in 2026/27. If the development is to be properly planned and delivered, and allowing for realistic timescales then a maximum of 500 houses could be achieved during this plan period, not 1,300 houses.
- x. Sites at SA6(c) delivers new homes in 2018/19. Sites at SA12(a) and SA10(a) deliver new homes in 2019/20. We also consider these to be optimistic as we are unaware that applications have been submitted. In our view a more realistic delivery trajectory for these sites would be:
 - a. Adoption, say March 2018
 - b. Application, December 2018
 - c. Resolution, June 2019

- d. Decision notice issued October 2019
- e. Reserved Matters submission, March 2020
- f. RM approval, July 2020
- g. Conditions discharged to enable start on site December 2020
- h. Infrastructure works – one year – December 2021
- i. Start building homes, December 2022
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xi. Land West of Mildenhall cannot reasonably be expected to contribute until 2024/25 at the earliest. 220 homes therefore need to be deducted from the five year supply. For years 2021/21 and 2021/22 Land west of Mildenhall should be “0”. 102 homes at SA6(c), 120 at SA12(a) and 150 at SA10(a) should be removed from the 5 year supply. Tables 1 and 2 set out our view of five year supply based on both the Local plan’s proposed housing target of 6,800 and the OAN of 7,600, using Sedgefield, a 20% buffer and the assumptions on sites set out above. In neither case can the council demonstrate a five year supply.

Table 1: Five Year Supply based on OAN of 7,600			
A	Total Local Plan requirement		7,600
B	Annual Local Plan requirement	A/years in plan period	380
C	Actual Completions to date		1,655
D	Required delivery to date	B*no. years since base date of plan	2,280
E	Performance relative to plan	C-D	-625
F	Basic five year requirement	B*5	1,900
G	Five year requirement including delivery to date	F+G	2,525
H	Buffer	20%*G	505
I	Total five year requirement	G+H	3,030
J	Average annual requirement	I/5	606
K	Identified supply		2,332
L	Years supply	K/J	3.8
M	Shortfall/surplus in Five years	K-I	-698

A	Total Local Plan requirement		6,800
B	Annual Local Plan requirement	A/years in plan period	340
C	Actual Completions to date		1,655
D	Required delivery to date	B*no. years since base date of plan	2,040
E	Performance relative to plan	C-D	-385
F	Basic five year requirement	B*5	1,700
G	Five year requirement including delivery to date	F+G	2,085
H	Buffer	20%*G	417
I	Total five year requirement	G+H	2,502
J	Average annual requirement	I/5	500
K	Identified supply		2,332
L	Years supply	K/J	4.7
M	Shortfall/surplus in Five years	K-I	-170

- xii. With an unachievable level of growth included within the housing trajectory, it must be concluded that the housing trajectory is neither reasonable nor realistic in terms of housing delivery.
- xiii. Additional allocations need to be made for deliverable sites in order to ensure early delivery and take account of a realistic rate of delivery at Mildenhall

Annex 1: achieved planning timelines for strategic schemes

Site	Local Planning Authority	Lead Developer	Date of Adopted Local Plan	Homes	Submission of application	Committee resolution	Decision notice issued	start on site	occupation of first homes	Submission to first occupations
Darwin Green	Cambridge City	David Wilson Homes	2006	1593	Dec-07	Jul-10	Dec-13	Aug-17	Dec-18	11 years
North West Cambridge	Cambridge City & South Cambs	Cambridge University	2009	3000	Sep-11	Aug-12	Feb-13	late 13	Jul-17	4.5 years
Clay Farm, Cambridge	Cambridge	Countryside	2006	2300	Jul-07	May-08	Aug-10	Oct-11	Mar-13	5.75 years
Trumpington Meadows	Cambridge City & South Cambs	Grosvenor/Barratt	2006/7	1200	Dec-07	Jun-08	Oct-09	Nov-11	Dec-12	5 years
Northstowe	South Cambs	Gallagher	2007	1500	Dec-07	Oct-12	Apr-14	Apr-15	May-17	9.5 years
North West Bury St Edmunds	St Edmundsbury	Countryside	2010	1070	Jul-13	Jan-14	Oct-14	Apr-16	tbc	
South east Bury St Edmunds	St Edmundsbury	Pigeon	2010	1200	Dec-15	Jan-17	tbc			
North East Haverhill	St Edmundsbury	Hallam	2010	2500	Oct-15	tbc				