

## Forest Heath District Council

### Examination of the Single Issue Review of Core Strategy Policy CS7

#### *Response to Matter 3 – The Supply of Land for Housing and Matter 4- The Spatial Distribution of Housing*

Submitted by Boyer on behalf of Persimmon Homes (Anglia)

#### ***Background***

1. This hearing statement has been prepared by Boyer on behalf of Persimmon Homes in response to Matter 3- The Supply of Land for Housing and Matter 4- The Spatial Distribution of Housing.
2. Persimmon Homes controls land known as 'Land South of Burwell Road ("the Site") which is included in the Site Allocations Document Development Plan Document (DPS) as a Proposed Allocation (Policy SA12 (a)), with an 'indicative capacity for 205 homes.
3. Persimmon Homes has made separate representations to the Site Allocations DPD which support the principle of development on this site. As part of the representations however, evidence has been presented which demonstrates that the site is suitable to accommodate 300 houses, an Early Years School, improved cycle links, public open space and strategic landscaping.
4. A response to each of the Inspector's questions is provided below:

#### ***Issue 3.1 (c) Do these figures include any allowance for under-delivery or non-implementation? If so, what allowance has been made and what is the reason for the level used? If no such allowance has been made, should one be?***

5. Policy CS7 does not indicate whether an allowance has been made to account for under-delivery in respect to the total supply figure in CS7.
6. The Council's latest Assessment of Five Year Supply of Housing Land (July 2017) states that no lapse rate has been applied to the five year land supply calculation, and it is therefore assumed that no discount has been made to the trajectory in CS7.
7. We suggest that it would be appropriate to apply a 10% non-implementation rate to committed sites with planning permission, as this would help ensure that the trajectory is realistic and allows for potential under-delivery over the plan period.

#### ***Matter 3.2 (a) The total supply amounts to only 77 dwellings more than the OAN. Is there a risk that the need for housing will not be met?***

8. With a contingency of only 77 dwellings (particularly if a 10% non-implementation rate has not been applied), there is a risk that housing needs across the plan period will not be met.
9. The Council's latest position on five year supply (July 2017) indicates a supply of 7036 dwellings over the Plan period. Whilst this provides some additional buffer, this still only equates to a 236 dwelling surplus over the plan period (only 3.4% buffer).

10. NPPF Paragraph 14 requires Local Plans to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change and this level of contingency given only limited flexibility for the Plan respond to changes.

***Matter 3.2 (b) The total supply amounts to only 77 dwellings more than the OAN. Should the supply be increased to improve certainty in this regard?***

11. Having regard to the above comments, we consider that there is a strong case to support an increase in the housing supply, to ensure greater flexibility and contingency, particularly if no allowance has been made for non-implementation.
12. An increase in supply could be achieved by reviewing the capacity of the proposed allocated sites in the first instance, to establish whether there are opportunities to increase the quantum of development.
13. Persimmon Homes has made separate representations to the Site Allocations DPD seeking an increase in the level of development on the proposed allocated site SA12 (a) from 205 to 300 dwellings.
14. This amendment alone would provide an additional 95 dwellings to the Council's supply and in turn, help provide greater certainty without having to allocate additional sites.

***Matter 3.4 (a) The Council's paper 'Assessment of a five year supply of housing land taking a baseline date of 31 March 2016' [B11] calculates the five year requirement, excluding the shortfall since 2011- it appears that within the various calculations presented, the 5% buffer is added before the shortfall figure, and thus excludes the shortfall. Should the shortfall figure be added before the 5% buffer is applied?***

15. The Council's latest position on five year land supply was published in July 2017, after the publication of the Matters and Issues.
16. The Council has now calculated the requirement by applying the 5% buffer with the shortfall included. We would endorse this approach.

***Matter 3.4 (b) Both the Sedgfield and Liverpool methods of calculating the five year requirement are contemplated in the Council's paper [B11]. Should the shortfall be addressed in the first five years (as in the Sedgfield method)? If not, why not?***

17. The July 2017 assessment only uses the Sedgfield approach. This methodology is supported as it accords with National Planning Practice guidance which identifies that Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.

***Matter 3.6 Overall, is there a supply of specific deliverable sites sufficient to provide five years worth of housing with an appropriate buffer (moved forward from later in the plan period) to ensure choice and completion in the market for land?***

18. The July 2017 assessment indicates that the Council can demonstrate 6.7 years supply (surplus of 735 dwellings) for the period 2017 to 2022.
19. With regard to site SA12 (a) the site is identified for 205 houses, with 40 dwellings completed per annum from 2019/20 onwards.
20. Notwithstanding that we consider the site suitable for 300 dwellings; we can endorse the Council's assumptions regarding the expected delivery rates, which appear realistic. The site is suitable, available and achievable and it is Persimmon's intention to progress an outline planning application towards the end of the year.
21. Having regard to our comments on the five year supply methodology discussed above, it would appear that the Council's five year supply is relatively robust, although we have nevertheless identified that greater flexibility (notably additional supply) is required to address the housing requirement over the plan period.

***Matter 4.6 Overall is the spatial distribution of housing justified?***

22. Whilst we support the principle of new housing in the Primary Villages, having regard to the suitability of site SA12 (a) to accommodate 300 dwellings, we submit that the level of growth in the Primary Villages (Beck Row, Exning, Kentford and West Row) should be increased to **at least 549 dwellings**.
23. Policy CS7 requires at least 6,800 homes over the Plan period, whilst the proposed level of growth in the settlements is expressed as a 'fixed' number.
24. By contrast however, the housing requirement on the proposed allocated sites is expressed as an 'indicative' number and therefore could be higher.
25. Increasing the proposed level of growth in the Primary Villages (to at least 549 dwellings) would allow a comprehensive scheme for 300 houses to come forward in accordance with the strategic Policy CS7.
26. In any event, to provide greater flexibility, it is submitted that Policy CS7 should make it clear that the 'additional provision' in each of the settlements is also an 'at least' number.
27. The specific amendment to the broad distribution of growth as set out in Policy CS7 is therefore as follows:

Boyer's Proposed Amendment to Policy CS7

Settlement	Existing Completions and commitments (2011 -2016)	Additional Provision	Totals
Brandon	59	71	<b>At least 130</b>
Mildenhall	185	1412	<b>At least 1597</b>
Newmarket	291	321	<b>At least 612</b>
Lakenheath	95	828	<b>At least 923</b>
Red Lodge	699	1129	<b>At least 1828</b>
Primary Villages	953	454 <b>549</b>	<del>1407</del> <b>At least 1502</b>

*Bold: proposed amendment*

28. This proposed amendment would provide flexibility in the event that the level of development on the proposed allocated sites exceeds the 'indicative' number stated in the Site Allocations Policy DPD.
29. Exning has been previously assessed in terms of its capacity to accommodate growth with the Infrastructure and Environmental Capacity Appraisal (IECA) (it was identified that the existing infrastructure could support 500 new homes) and more recently as part of the Infrastructure Delivery Plan which confirms that there is a good network of existing infrastructure with capacity (or the ability for improvement with developer contributions).
30. Exning is well served by a number of facilities and services including a Primary School, convenience store, Post Office, public houses and there are a number of bus stops providing good access to nearby villages as well as Newmarket, Bury St. Edmunds and Cambridge. It is therefore considered a sustainable location to accommodate the level of housing growth proposed.
31. In summary, Persimmon Homes is seeking to increase the housing provision in the Primary Villages by a further 95 dwellings. This increase accounts for the additional units on site SA12 (a) whilst the addition of the wording '**at least**' provides flexibility to ensure that if higher levels of development are suitable on the proposed allocated sites, there would not be an inherent conflict Policy CS7.