

**Forest Heath District Council**  
**Single Issue Review (SIR) of Core Strategy Policy CS7**  
**August 2015**

**Technical paper to support the overall housing  
requirement and distribution for the district**



**Forest Heath**  
District Council

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### **The purpose of this paper**

This technical paper has been prepared to support the (Further) Issues and Options Core Strategy Policy CS7 Single Issue Review (SIR). The SIR is currently the subject of an eight week period of consultation from 11<sup>th</sup> August to 6<sup>th</sup> October. The document can be viewed, and responses made by visiting the council's public consultation website:

<http://westsuffolk.jdi-consult.net/localplan/>

This technical paper sets out the background research and evidence behind the two options for the level of housing growth, and four options for the distribution of housing growth, set out in the SIR.

The first part of the paper sets out the different sources of evidence that support the figure of 7000 homes required in the district over the remainder of the plan period.

**1. What is the identified Objectively Assessed Need (OAN) and affordable housing need for the district?**

- 1.1 The Cambridge Sub-Region Strategic Housing Market Assessment (SHMA) update was published by Cambridgeshire Insight in June 2013. It is available on the Cambridgeshire Insight website:

<http://www.cambridgeshireinsight.org.uk/housing/shma/shma-current-version>

The SHMA reflects a robust assessment of the full objectively assessed needs for market and affordable housing in the Housing Market Area (HMA). This was prepared in accordance with the extant national guidance, including the National Planning Policy Framework (NPPF), and took into account a wide range of national, sub-national and local data on population trends and market and economic signals, including the 2011 Census and the 2008 and 2011-based DCLG household projections.

- 1.2 The Cambridge Sub Region Housing Market Area comprises all five Cambridgeshire districts: Cambridge City, East Cambridgeshire, Huntingdonshire, Fenland and South Cambridgeshire; and the west Suffolk districts of Forest Heath and St Edmundsbury. These authorities and Peterborough City Council signed a Memorandum of Cooperation in May 2013 that demonstrates their commitment to meeting the full objectively assessed housing needs of the HMA.
- 1.3 The SHMA identified the full, objectively assessed housing need in Forest Heath between 2011 and 2031 is for 7000 dwellings. The 7000 dwelling requirement is an assessment of total housing needs based on demographics, and is referred to as 'all homes', as it includes market housing and affordable need. The proportion of affordable housing need is for 3742 dwellings over the same period.
- 1.4 The identified need for 7000 homes will boost significantly the supply of housing in Forest Heath as required by the NPPF (para 47). The SHMA takes a consistent approach to assessing need across the HMA.
- 1.5 The SHMA has recently published an updated assessment (2014) of the affordable need for the district at 2703 dwellings (excluding supply from re-letting and re-sales from existing stock). This need includes existing unmet need of some 1694 homes. Much of this unmet need represents households who are already housed, so if rehoused into affordable units would release housing onto the market. They do not necessarily reflect households with a need to be housed, but instead households whose accommodation does not meet their requirements, this therefore creates a housing need.
- 1.6 The latest affordable housing need figure for 2014 shows a decrease in arising need at 2703, which compares with the need in 2013 of 3742

homes. These figures capture the situation at a moment in time and can be subject to fluctuation.

- 1.7 The Council has considered, as evidenced within this paper, whether in meeting the 7000 dwellings figure this will be sufficient to meet the full and objectively assessed needs for both market and affordable housing. In so doing it has taken account of the market/viability considerations and has had regard to issues of sustainability which include the district's environmental constraints. Before considering these factors, we turn to the more recent sources of evidence on housing need below.

### **Other sources of evidence to inform the setting of an appropriate housing provision target**

#### East of England Forecasting Model

- 1.8 The East of England Forecasting Model (EEFM) was developed by Oxford Economics to project economic, demographic and housing trends in a consistent fashion. It covers a wide range of variables, and is designed to be flexible so that alternative scenarios can be run. The EEFM 2013 and EEFM 2014 figures reflect the potential economic context that may influence people's ability to access housing.
- 1.9 The baseline EEFM 2014 figures (published 2015) indicate there will be a demand for 5200 additional homes in the period 2011-2031, representing a fall on previous forecasts. The technical report to support this work has yet to be published. However, these forecasts do not consider the full and objectively assessed need (OAN) for housing as is the case with the SHMA and, as a consequence, they do not accord with the provisions of the NPPF insofar as establishing an over-arching housing requirement figure is concerned.

#### DCLG 2012-based household projections

- 1.10 The latest household projections published by DCLG in February 2015 forecast an increase in Forest Heath of 5900 households in the period 2011-2031. At first this appears to suggest a much lower requirement emerging than the 7000 homes requirement. However, these figures are derived from the ONS population projections and therefore can only provide the starting point for estimating housing need. Other evidence in needs to be considered to properly assess the overall need including: demographic factors, past trends and market signals, future employment, affordable housing need, and other local circumstances.

#### Update report by Cambridgeshire Research Group

- 1.11 In light of the most recent EEFM and DCLG forecasts Cambridgeshire Research Group (CRG) has prepared a response paper which sets out that the SHMA 2013 OAN figure of 7000 dwellings in 2011-2031 still remains appropriate. This paper is attached as Appendix A. The paper outlines the implications of the latest DCLG demographic projections and the updated

EEFM economic forecasts for a jobs-led demand for 5200 additional dwellings. CRG's analysis confirms that the Cambridge Housing Market Area's objectively assessed need for 7000 additional houses in Forest Heath remains an appropriate basis to plan for housing needs.

- 1.12 The objectively assessed need figure is significantly higher than that required to meet demographic projections as it takes account of economic and market signals. This has contributed to the conclusion that the 7000 'all homes' figure for Forest Heath remains an appropriate basis to plan for, and that the updated 2703 affordable homes figure reflects the latest affordable need position. These two figures are taken forward to the next stage of the assessment in this technical paper.

## **2. Assessment of how much of the affordable need is likely to be met.**

- 2.1 Officers have undertaken an assessment of how much of the affordable housing need is likely to be met under the following headings:
- past trends
  - how many affordable houses are likely to be delivered through market housing schemes when applying local and national planning policy
  - having regard to expected delivery of affordable housing from other sources including rural exception sites
  - whether removing the intermediate category of housing need is a reasonable option
  - when should the unmet need be met
- 2.2 In addition, we have considered the contribution windfall and other sources of unallocated supply will make towards to the overall housing requirement. The outcomes of these considerations are reported below.

### **Past trends**

- 2.3 The Forest Heath Core Strategy was adopted in May 2010, when policy CS9: Affordable Housing Provision came into force setting the affordable homes targets. The policy sets a target of 30% affordable dwellings for schemes of 10 or more dwellings or on sites of more than 0.33 hectares, and a target of 20% affordable dwellings on sites in Primary Villages and Secondary Villages for schemes of 5 to 9 units or on sites larger than 0.1 hectares. The full detailed requirements are set out in the policy. It is therefore appropriate to examine the level of housing delivery since the policy came into force in 2011, although it should be noted that this includes permissions granted prior to that time which may not have been in compliance with the policy.
- 2.4 The table below shows the past trend of housing completions and affordable housing completions, and the percentage of the dwellings completed which are affordable in Forest Heath district from 2007 (there is no data available for affordable home completions prior to 2007). The three year period from 1<sup>st</sup> April 2011 to 31<sup>st</sup> March 2014 has been highlighted as this has been used as the basis for further calculations in this section of the paper.

<b>Monitoring year 1<sup>st</sup> April to 31<sup>st</sup> March</b>	<b>Net additional dwelling completions</b>	<b>Gross affordable completions</b>	<b>% of dwellings which are affordable</b>
<b>2007-2008</b>	549	97	18%
<b>2008-2009</b>	310	72	23%
<b>2009-2010</b>	454	15	3%
<b>2010-2011</b>	368	68	18%
<b>2011-2012</b>	332	79	24%
<b>2012-2013</b>	363	54	15%
<b>2013-2014</b>	244	73	30%
<b>Sub total 2011 - 2014</b>	<b>939</b>	<b>206</b>	<b>22%</b>
<b>Total</b>	<b>2620</b>	<b>458</b>	<b>17%</b>

- 2.5 To put these figures into historical context it should be noted that prior to adoption of the Forest Heath Core Strategy the former Regional Spatial Strategy (abolished in January 2013) had required development plan documents to set their own affordable policy, and monitored delivery against a regional target of 35%.
- 2.6 The table in paragraph 2.5 above shows 206 affordable homes have been completed from 2011 to 2014, an average of 22% per annum. However, when a longer time period (7 years, from 2007/08 to 2013/14) is taken it shows a lower average of 17% affordable homes per annum has been delivered.
- 2.7 The extant affordable commitments remaining at 31<sup>st</sup> March 2014 are 147 dwellings.
- 2.8 Taking into account the 206 affordable completions in the three years from 2011, and the extant commitments for 147 affordable homes at 31<sup>st</sup> March 2014, we can calculate the residual affordable need to be met in the plan period in order to meet the 'all homes' requirement of 7000 homes.
- 2.9 The residual market housing need is calculated as follows:

Remaining market homes to be provided = 7000  
 Completions and commitments at 31<sup>st</sup> March 2014 = 1,700

**7000 - 1700 = 5300 residual market housing figure**

The residual affordable housing need calculation is as follows:

Remaining affordable homes to be provided = 2703  
 Completions and commitments at 31<sup>st</sup> March 2014 = 353

**2703 - 353 = 2350 residual affordable homes figure**



- 2.10 The residual affordable need (2350) is 44% of the residual market need (5300). This indicates that the SIR needs to plan to provide a residual affordable need of 2350 homes, at a residual annual rate of 138 dwellings. Based on past delivery rates, this rate of delivery is not likely to be achievable and far exceeds the level required by policy CS9.
- 2.11 As a low proportion of affordable homes has been delivered in the previous years of the plan period this creates challenges ahead in trying to address affordable needs against the policy threshold in CS9.
- 2.12 Alternative assessments of potential delivery rates of affordable provision are considered below.

**How many affordable houses are likely to be delivered through market housing schemes when applying local and national planning policy?**

**Larger site/small site split**

- 2.13 In order to assess the likely delivery rate of Core Strategy Policy CS9 we need to assess what proportion of development is expected to come forward from large sites and small sites. Large sites comprise those of 10 dwellings or more and small sites less than 10 dwellings.
- 2.14 Based on past completion rates this shows a split of 76% of housing completions have been delivered on large sites, and 24% on small sites.
- 2.15 Policy CS9 states that on schemes of 10 or more dwellings or sites of more than 0.33 hectares a target of 30% affordable dwellings will be sought where viable. For the purpose of this assessment we have calculated sites of 10 units or more and have not had regard to site area, as this provides sufficient information to inform the level of affordable provision that is likely to be met. The policy also requires a lower threshold for schemes of 5 to 9 units.
- 2.16 Assuming this proportion of 76% is carried forward, we can expect 76% of the residual need to be delivered on large sites:

76% of 5300 = 4028

The 30% affordable housing provision required from 4028 = 1208.

If the same calculation is applied to the SHMA 'all homes' figure of 7000 it results in the following:

76% of 7000 = 5320

The 30% affordable housing provision required from 5320 = 1596

- 2.17 However, the affordable provision likely to be achieved should reflect what has already been delivered for 2011-2014. This totalled 939 homes of which 206 are affordable (22%), to which can be added the extant commitments of 147 affordable units.
- 2.18 Taking the likely number of affordable homes expected to be delivered from development on large sites (using the calculation in paragraph 2.16) of 1208, and adding completions and extant commitments (206 + 147 = 353), results in an anticipated total of 1561 affordable homes over the plan period. This figure is only 22% of the SHMA 'all homes' requirement of 7000 dwellings. It also assumes the full 30% is achieved on all sites over 10 dwellings and does not have regard to sites where a lower provision is made due to site viability issues. However, this makes no allowance for rural exception sites and 100% affordable sites, which could balance out any shortfalls in delivery due to viability.

### **The large site/small site split based on planned allocations in the SALP**

- 2.19 An alternative way to calculate expected delivery is to assess the likely delivery based on the number of sites proposed to be allocated in the Site Allocations Local Plan (Issues and Options consultation, Summer 2015):

Residual need = 5300 minus windfall allowance of 200 = 5100

30% of 5100 = 1530 affordable homes

**1530 + 353 affordable homes committed or completed = 1883**

1883 = 27% of 7000 (the 'all homes' option)

Shortfall = 820 affordable homes (or a shortfall of 610 if the higher growth option of 7700 homes was planned for).

- 2.20 It should be noted this alternative calculation assumes that all allocated sites are capable of achieving the full 30% affordable provision, making no allowance for viability considerations. Overall this assumption is considered to be reasonable. This is based on the current level of delivery of affordable homes on large sites, and the fact that no allowance has been made for provision coming forward through rural exception sites, or a higher level of provision coming forward from 100% affordable schemes.

### **Having regard to expected delivery of affordable housing from other sources including rural exception sites**

- 2.21 Core Strategy policy CS9 and para 3.8.8 supports rural exception housing. There have been the following rural exception schemes in Forest Heath:
- West Row – Eldo Gardens, 8 units completed 2012-13;
  - Freckenham and Worlington – 6 units completed 2013-14;

- West Row – Pott Hall Road, 10 units completed 2009-2010; and
- Barton Mills - Church Lane, 6 units completed 2013-14.

This gives an overall supply of 30 affordable units over a 5 year period, an average of 6 per annum.

- 2.22 The expected delivery from rural exception schemes will make an important contribution towards the affordable housing need, which could have potential to achieve some 100 additional units over the plan period (per annum x 17 years remaining = 102).
- 2.23 Schemes of 100% affordable housing are also supported by the council. A joint Supplementary Planning Document entitled Joint Affordable Housing was published in October 2013. This outlines how applications for affordable housing will be considered. The council resolved to grant planning permission, subject to completion of a S106 agreement, to an application for 100% affordable housing on 1<sup>st</sup> July 2015. This is a cross boundary scheme at Fengate Drove, Brandon (ref: DC/14/2219/FUL) for 64 units, around half of which are in Forest Heath. It is an example of a proposed development on a brownfield contaminated site with viability issues, which secured funding for remediation to bring forward 100% affordable housing scheme.
- 2.24 In addition there are other mechanisms beyond the scope of planning policy available to assist in the provision of delivery of affordable housing in the district, these are explored below.
- 2.25 Forest Heath District Council, working together with St Edmundsbury Borough Council as West Suffolk, recently published a joint Housing Strategy. The strategy includes provision of affordable housing directly by registered provider partners through funding secured through the Homes and Community Agency's (HCA) Affordable Homes Programme. Registered provider partners are able to make firm bids to HCA for funding affordable housing from the Affordable Homes Programme 2015-18. The majority of the new programme is being made available for homes under the Affordable Rent regime.

### **Is removing intermediate need an option?**

- 2.26 Intermediate housing is defined in the glossary to the NPPF as stated below. This demonstrates that subject to meeting the criteria in the definition intermediate need does constitute part of the affordable housing need which should be met.

**Extract from the NPPF Glossary:**

**“Affordable housing:** Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes”.

- 2.27 Removing intermediate housing need is not considered appropriate as those individuals within this category have expressed a need for affordable housing, and this need should be addressed by the Council.

**When should the unmet need be addressed?**

- 2.28 Unlike the SHMA ‘all homes’ requirement, the affordable need includes within it a backlog of previous unmet needs (some 1694 homes at 2014), and consequently the affordable need is typically higher than that which could realistically be delivered through market housing schemes. Much of this backlog represents households who are already housed, so if rehoused into affordable units will release housing onto the market. They do not necessarily reflect households with a need to be housed, but instead households whose accommodation needs have not been met.
- 2.29 The affordable need is assessed annually and has been shown to be subject to variation. It is considered appropriate to plan to meet the identified need over the plan period, so far as this is reasonable, given constraints, market considerations, and availability of suitable sites. This is considered further in setting an appropriate strategic housing target in section 4.

## Conclusion

2.30 This section has considered how much of the affordable housing need is likely to be delivered in practice:

- Calculations in paragraph 2.10 indicate the residual affordable housing need to be 2350.
- This means 138 affordable homes need to be provided each year for the remainder of the plan period.
- Past trends have shown an average completion rate of 69 affordable units per annum, this falls a long way short of the residual need of 138 affordable units needed per annum.
- Calculations show the likely delivery from planned allocations made through the Site Allocation process (taking of commitments, completions, and windfall allowance) is 1883 affordable homes, or 110 units per annum, equating to 27% affordable provision.

2.31 Windfall and other sources of non allocated housing supply will deliver an unknown but small quantity of affordable homes. In addition, rural exception sites and 100% affordable sites will make an important contribution to affordable needs in the district.

2.32 The calculations and considerations set out above illustrate that there will clearly be a shortfall in meeting the full identified affordable housing need over the plan period. This is considered fully in section 4. Prior to that Section 3 considers windfall and other sources of unplanned housing delivery.

### **3. Windfall and other sources of unplanned housing delivery**

3.1 The council has undertaken an assessment of windfall likely to come forward through the plan period. This is a realistic assessment undertaken in accordance with national guidance and having regard to the local circumstances particular to Forest Heath district as described in this paper.

3.2 National guidance as set out at para 48 of the NPPG states as follows;

“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens”.

#### **Historic windfall delivery rates**

3.3 Windfall rates in recent years reflect a period of time when the majority of the site allocations from the 1995 local plan were built out, and there was no five year land supply, so a large proportion of sites coming forward were windfall. It is not considered appropriate to use these rates as the SHLAA sites form a much more realistic assessment for moving forward, and these are considered below.

#### **Strategic Housing Land Availability Assessment (SHLAA) sites**

3.4 The SHLAA is produced annually by the council to help demonstrate the district has sufficient sites to meet housing land supply. It is made up of sites put forward by landowners and developers as well as sites identified by the council through previous studies/work. The latest 2015 SHLAA can be read at the following link <http://westsuffolk.jdi-consult.net/localplan/>

3.5 The SHLAA details those ‘included’ sites which, in terms of development are available, suitable and deliverable, and could therefore be selected for inclusion in the council’s Local Plan. Sites in the SHLAA can also be ‘deferred’ (considered not suitable/available for development) on the basis of issues which would need to be overcome before development could take place, for example for nature conservation reasons or because the site lies within an area of flood zone.

3.6 The Single Issue Review of Core Strategy policy CS7 (SIR) is being prepared alongside a Site Allocations local plan (SALP) for the district. Sites within the SALP comprise SHLAA sites of 10 dwellings or more located in or adjacent to towns, key services centres and primary villages, which had not received planning consent prior to 1 April 2014, and where development has not commenced. This leaves a number of other sites in the SHLAA which are considered suitable, available and deliverable, which are below 10 dwellings in site capacity, are not proposed within the Issues

and Options SALP, and are located in or adjacent to settlements across the district. These sites include sites in or adjacent to secondary villages; they are not deferred in the SHLAA, and not included in the SALP; they have not been commenced, and had not received planning permission prior to 1 April 2014. These are the sites that are used as the starting point for calculating windfall supply.

- 3.7 The SHLAA makes an assumption each of these sites will be limited to 10 dwellings, but does not limit the number of sites coming forward. However, based on past experience it is considered unlikely that all of these sites will come forward.

### **Prior notifications/approvals**

- 3.8 Prior notifications/approvals, particularly conversion of agricultural buildings and offices to residential units, currently provide an additional source of new housing being delivered which is not counted in the supply. These permitted development rights are only planned to be available to 30th May 2016. This being the case it is difficult to quantify the contribution this may continue to make to housing delivery over the plan period.

### **Other sources of unplanned supply**

- 3.9 In addition to the identified windfall, there will be an element of unidentified sites coming forward, as this is the nature of this category as described in the definition of windfall in the NPPF:

“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.”

This potential source of additional dwellings cannot therefore be counted, but can reasonably be assumed to contribute to the windfall calculation.

### **Rural exception sites**

- 3.10 Rural exception sites are expected to contribute some 6 units per year to the overall supply of affordable homes. Further details to support this are included in section 2 of this report. Over the residual plan period this could amount to a further 100 affordable units. However, there are other circumstances which can affect the take up of these schemes; for example, some sites may allow a small number of market homes to be provided on rural exception sites in order to facilitate delivery of affordable units, this could affect the potential affordable provision. In addition, the absence of an up to date local plan and 5 year land supply results in a reduction in the number of rural exception sites coming forward.

### **Overall windfall/unplanned housing supply**

- 3.11 Given the unpredictable nature of windfall development a conservative allowance of 200 homes is made over the plan period to 2031, this allows for SHLAA sites, prior notifications/approvals and other unplanned housing sites coming forward.



#### **4. Setting a housing growth target – consideration of 4 options**

##### **Should there be uplift to meet more of the affordable need?**

- 4.1 In light of the assessment of how many affordable homes are likely to be delivered through market housing schemes in section 2 above, it is appropriate to consider whether the overall housing provision figure should be uplifted to enable more of the affordable need to be met. This is considered below.
- 4.2 In setting a housing provision target the starting point is to take the SHMA 'all homes' assessment and consider the following factors: whether there is capacity of sites as identified in the SHLAA; whether there is any unmet need from other authorities which need to be addressed; and whether in meeting the SHMA 'all homes' requirement the council has demonstrated it has gone as far as it reasonably can to meet its affordable need and taking into account the authority's policy objectives. These factors will inform setting an appropriate housing target for the district. They are addressed in turn below, with more detailed consideration of the various options set out later in this paper.
- 4.3 The SHLAA (2015) indicates that there is capacity for 13,293 dwellings in the district. Not all of these sites are likely to be suitable for allocation, so they will be the subject of a sieving process to bring forward those sites which best meet the objectives of the plan, that are sustainable, and that satisfy all other necessary requirements of the plan making process.
- 4.4 The Memorandum of Cooperation dated May 2013 demonstrates that each authority will undertake to meet the full objectively assessed housing needs as identified by the SHMA. There is no requirement for Forest Heath to address unmet need from other authorities as each has committed to address its own need requirements. There is one exception to this where Peterborough and East Cambridgeshire have a joint agreement on addressing their needs, but this does not affect Forest Heath's requirement.
- 4.5 The following two questions will be considered below.

Q. Has the authority gone as far as it reasonably can in meeting its affordable need?

Q. Does the housing provision take account of policy objectives?

##### **Detailed consideration of each housing provision option**

- 4.6 The table below shows four options for setting an overall housing provision for the district. The SIR will plan to distribute the residual need across the district. This is the remaining number of homes which needs to be planned when we take out those homes already built or planned at 31<sup>st</sup> March 2014. The details of homes already built or planned are reported in the five year land supply, available on the council's website:

	Number of homes needed each year (2011-2031)	Number of homes needed over 20 years (2011-2031)	Homes already built or planned (at 31 <sup>st</sup> March 2014)	Additional homes required 2014 -2031
Option 1 Planning for lower growth (DCLG 5900 figure)	295	5900	1700	4200
Option 2 <b>SHMA 'all homes' requirement</b>	<b>350</b>	<b>7000</b>	<b>1700</b>	<b>5300</b>
Option 3 Uplift for affordable housing (+10%)	385	7700	1700	6000
Option 4 Meeting full affordable housing need	485	9700	1700	8000

4.7 All four options have been assessed against the following criteria, and these questions are addressed in turn:

- **1 - is it achievable given market demand?**
- **2 - is it achievable given sustainability considerations?**
- **3 - is it achievable given environmental constraints?**
- **4 - does it represent a reasonable option given the anticipated supply of sites as informed by the SHLAA?**
- **5 - is it achievable given infrastructure constraints? and**
- **6 - is it in accord with Core Strategy Policy CS1: Spatial Strategy, and other local and national planning policies?**

4.8 Options that cannot clearly demonstrate that they can meet these criteria are not considered to be reasonable alternatives. The conclusion of each of the following assessments indicates whether or not the option meets these criteria sufficiently, and whether it was taken forward for inclusion in the Issues and Options consultation draft of the Single Issue Review.

## **Option 1 – Planning for lower growth (DCLG 5900 figure)**

- 4.9 The latest household projections published by DCLG in February 2015 forecast an increase in Forest Heath of 5900 households in the period 2011-2031.
- 4.10 These figures are derived from the ONS 2012 based population projections and, as advised by the PPG, provide the starting point for estimating housing need.
- 4.11 The household projection based estimate of housing need is based on the assumption of a continuation of past trends. The PPG states the estimates “may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply”(PPG para 015).
- 4.12 This option does not provide a reasonable basis on which to proceed, as the DCLG projection does not represent an evidenced full objectively assessed need (OAN) for market and affordable housing in the housing market area as required by the NPPF (para 47).

### **1. Is this option achievable given market demand?**

- 4.13 The Option 2 SHMA ‘all homes’ assessment of an additional 7000 homes increases significantly the supply of housing over and above that would be required to meet the need using only demographic projections. Option 1 only uses demographic projections to calculate need and does not take account of the area’s economic and market signals.
- 4.14 Option 1 would only deliver 295 homes per year which is lower than the average delivery rate over the last 10 years (averaging at 342 homes per annum 2004-2014).
- 4.15 This option is not achievable as it will not deliver the number of homes to support market demand.

### **2. Is this option sustainable?**

- 4.16 There are three dimensions to sustainable development; an economic role, a social role and an environmental role. These three roles are set out in the NPPF:

Extract from NPPF paragraph 7

“an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being;

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”

- 4.17 Option 1 would not contribute to the economic role as it would not ensure sufficient land is available to meet the identified SHMA ‘all homes’ requirement. Under Option 1 the annual build rate would be lower than the average rate for the past 10 years.
- 4.18 This option would not provide the social role as it would not meet the full objectively assessed housing and affordable housing needs. It will fall significantly short of meeting the identified affordable needs of the district.
- 4.19 This option is capable of according with the environmental role as demonstrated by evidence below.
- 4.20 The three sustainability strands are mutually dependant and therefore it is necessary to satisfy all three to meet the requirements of the NPPF. This option does not satisfy all three and therefore does not represent a sustainable option.

**3. Is this option achievable given environmental constraints?**

- 4.21 Almost half of the district is designated for nature conservation value, with three sites designated at the European level, 27 nationally important Sites of Special Scientific Interest (SSSI) and over 70 County Wildlife Sites (CWS). The international sites include the Breckland Special Protection Area (SPA), and Special Area of Conservation (SAC). Protecting these areas severely limits development opportunities.
- 4.22 The SHLAA 2015 takes into account environmental constraints and defers sites where there is no evidence these can be overcome. It is therefore considered that this option is achievable given these environmental constraints.

#### **4. Is there sufficient supply of sites (SHLAA) for this option?**

- 4.23 The SHLAA 2015 indicates there is capacity for 13,293 dwellings based on the council's estimates of potential delivery for each site. A much higher estimate of 15,619 could be achievable if an average of 30 dwellings per hectare was applied.
- 4.24 Not all of these sites are likely to be suitable for allocation, so they will be the subject of a sieving process to bring forward those sites which best meet the objectives of the plan, that are sustainable, and that satisfy all other necessary requirements of the plan making process.

#### **5. Is this option achievable given infrastructure constraints?**

- 4.25 Forest Heath District Council and St Edmundsbury Borough Council jointly commissioned independent consultants, Nathaniel Litchfield & Associates, to undertake an Infrastructure and Environmental Capacity Appraisal (IECA) for West Suffolk. Published in 2009, this appraisal considers how much growth each settlement can accommodate based on environmental and infrastructure constraints and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath District. (Environmental constraints are things such as flood zones and nature conservation designations).

The IECA can be viewed at

[http://www.westsuffolk.gov.uk/planning/Planning\\_Policies/backgroundpolicyevidence.cfm](http://www.westsuffolk.gov.uk/planning/Planning_Policies/backgroundpolicyevidence.cfm)

- 4.26 Given the IECA study assessed the capacity based on an RSS requirement of 6900 homes, and concluded that there is capacity to meet this and scope for further growth beyond the period, it reasonable to assume this should also apply to the similar SHMA 'all homes' requirement for 7000 homes, and the lower option of 5900 homes.
- 4.27 The IECA is being partially updated by the draft Infrastructure Delivery Plan (IDP) which can be viewed and commented on at:
- <http://westsuffolk.jdi-consult.net/localplan/>
- 4.28 The IDP sets out the infrastructure issues and requirements for the district to facilitate growth within the plan period (up to 2031). Not all infrastructure requirements are known at this stage, and the IDP will be updated as the Single Issue Review and Site Allocations Local Plan progress. However, the draft IDP 2015 indicates that there is unlikely to be any infrastructure capacity "show stoppers" that would prevent delivery of the SHMA 'all homes' requirement for 7000 homes, and consequently the lower growth option of 5900 homes.

## **6. Does this option fit with CS1 and other local and national policies?**

- 4.29 Core Strategy Policy CS1 provides the spatial strategy for the district. It identifies Newmarket, Brandon and Mildenhall as market towns, Lakenheath and Red Lodge as key service centres, and a number of primary villages, secondary villages, small settlements and sustainable military settlements. Paragraph 2.5.9 of the Core Strategy identifies that the highest proportion of new development should be directed to the three market towns followed by the key service centres. It also acknowledges that development in the district is constrained (para 2.5.6).
- 4.30 Option 1 would not accord with the NPPF requirement to meet the full objectively assessed need for market and affordable housing. This option is contrary to the Memorandum of Understanding and therefore would require agreement from neighbouring authorities to meet the shortfall elsewhere.
- 4.31 This option would not fit with the Government's objective to significantly boost the supply of housing (NPPF para 47). It would only achieve 74 affordable units for each residual year on the assumption that the full 30% policy CS9 affordable housing target can be delivered by market housing led developments. This is lower than the 138 needed each residual year, and given past evidence of delivery, it seems unlikely that 74 affordable homes would be delivered for each remaining year of the plan period.
- 4.32 The evidence demonstrates there are not likely to be environmental or sustainability reasons why the full objectively assessed need of 7000 homes cannot be met. Consequently a lower housing provision can not be supported.
- 4.33 Option 1 has the potential to be delivered in accordance with policy CS1 and other local plan policies but it would not accord with national policy to meet the full objectively assessed market and affordable housing need and there are no identified special overriding constraints to indicate a lower provision is necessary.

### **Conclusion**

- 4.34 This is not a reasonable option on which to proceed, as the projection does not represent an evidenced full objectively assessed need (OAN) for market and affordable housing in the housing market area as required by the NPPF (para 47).
- 4.35 This option will not deliver the number of homes to support market demand and so will suppress demand.
- 4.36 There would be sufficient sites to bring forward this option having regard to environmental and infrastructure constraints. However, it is not considered reasonable to consult on Option 1 as an alternative as this

level of growth would not accord with sustainability criteria of the NPPF, would suppress market demand, and would fail to meet the OAN for the district.

## **Option 2 – Meeting the SHMA ‘all homes’ requirement**

- 4.37 The SHMA ‘all homes’ assessment of 7000 homes takes full account of market signals, including the need to improve affordability and to help deliver the required number of affordable homes.
- 4.38 The uplift between the household projections and the ‘all homes’ 7000 requirement for Forest Heath provides the flexibility to respond to market signals, as well as boosting economic growth. On this basis, it would be unnecessary to make any specific additional uplift on the ‘all homes’ figure.
- 4.39 This option would provide the number of homes planned for in the ‘all homes’ figure which forms part of the Memorandum of Understanding.

### **1. Is this option achievable given market demand?**

- 4.40 The SHMA ‘all homes’ requirement for an additional 7000 homes already increases significantly the supply of housing over and above that required to meet the need based on the area’s demographic projections, as it takes account of the area’s economic and market signals.
- 4.41 Option 2 would deliver 350 homes per year which is comparable to the average delivery rate over the last 10 years (averaging at 342 homes per annum 2004-2014). This option is therefore reasonable based on past market trends.

### **2. Is this option sustainable?**

- 4.42 In terms of the economic role (see paragraph 4.16 above) this option would ensure sufficient land would be identified to build a strong, responsive and competitive economy. The annual build rate would be comparable to the average rate for the past 10 years.
- 4.43 This option would meet the SHMA ‘all homes’ requirement but would fall short of meeting the full identified affordable needs of the district at 2703 homes, by an estimated 810 affordable units. However, over the plan period, it has been demonstrated that an estimated 1883 affordable units are likely to be delivered in the district, representing a significant contribution to the overall need and contributing to meeting the social role of the sustainable development thread.
- 4.44 This option is capable of according with the environmental role as demonstrated by evidence below.
- 4.45 This option is considered to satisfy all three strands of sustainability and therefore represents a sustainable option.

### **3. Is this option achievable given environmental constraints?**

- 4.46 It is considered that this option is achievable given the environmental constraints set out in paragraph 4.21 and the approach taken in the SHLAA (paragraph 4.22 above).

### **4. Is there sufficient supply of sites (SHLAA) for this option?**

- 4.47 Yes – see paragraphs 4.23 and 4.24 above.

### **5. Is this option achievable given infrastructure constraints?**

- 4.48 Yes, see paragraphs 4.25 to 4.29 above. The draft IDP 2015 indicates that there is unlikely to be any infrastructure capacity “show stoppers” that would prevent delivery of the SHMA ‘all homes’ requirement for 7000 homes.

### **6. Does this option fit with CS1 and other local and national policies?**

- 4.49 Option 2 fits with Core Strategy Policy CS1 (see paragraph 4.30 above). It would accord with the NPPF requirement to meet the full objectively assessed need for market and affordable housing, and the Government’s objective to significantly boost the supply of housing (NPPF para 47).
- 4.50 However, this option would only achieve 93 affordable units each year on the assumption that the full 30% policy CS9 affordable housing target can be delivered by market housing led developments. This is lower than the 138 needed each residual year, and given past evidence of delivery, it seems unlikely that 93 affordable homes would be delivered for each remaining year of the plan period.
- 4.51 Option 2 has the potential to be delivered in accordance with policy CS1 and other local plan policies, and it would accord with national policy to meet the full ‘all homes’ requirement but it would fall short of meeting the full affordable housing need.

### **Conclusion**

- 4.52 This option is considered to be reasonable to take forward, as it meets the SHMA ‘all homes’ requirement, it is sustainable, it reflects a level of housing delivery which has previously taken place, and there are sufficient sites available to accommodate this level of growth having regard to environmental and infrastructure constraints. It does not meet the full affordable housing need but, as evidenced in option 4 of this report, the option of achieving this has been discounted as being unreasonable.

### **Option 3 – Uplift for affordable housing (+10%)**

- 4.53 National Planning Practice Guidance (PPG) states at paragraph ID2a-029:



*"The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes."*

4.54 The first section of this paper sets out the context for meeting affordable housing need in Forest Heath district. Option 3 proposes a 10% increase on the 'all homes' requirement in order to address more of the affordable need. A 10% increase equates to 700 homes which could deliver 210 additional affordable homes, making an assumption each site could achieve the policy requirement of 30% affordable housing. This would leave a shortfall of 610 affordable homes ( $820 - 210 = 610$ ) on the 2703 affordable homes needed.

4.55 A 10% increase (or "uplift" as it is often called) has been used elsewhere in other authorities as a reasonable adjustment to the SHMA assessment. Paragraph 1.10 of the Inspector's Report on the Uttlesford Local Plan dated 3<sup>rd</sup> December 2014 states:

"I also accept that the objective of improving affordability could be difficult to achieve within the confines of one local authority area and that affordability is affected by many more factors than land supply. However, taking all the above factors in the round, I conclude that it would be reasonable and proportionate, in Uttlesford's circumstances, to make an upward adjustment to the OAN, thereby increasing provision with a view to relieving some of the pressures. In my view it would be appropriate to examine an overall increase of around 10% to about 580pa (an additional total of 1120 dwellings)."

4.56 Paragraph 41 of the Inspector's Report on the Eastleigh Borough Local Plan, February 2015 states:

"It is very difficult to judge the appropriate scale of such an uplift. I consider a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only a part of a much larger HMA. Exploration of an uplift of, say, 10% would be compatible with the "modest" pressure of market signals recognised in the SHMA itself."

4.57 An overall increase of around 10% (an additional 700 homes) is considered to be a reasonable alternative to use for consultation in Forest Heath given the availability of sites, the capacity of settlements to reasonably accommodate this level of growth, and having regard to environmental and infrastructure constraints and market demand. It provides a reasonable alternative to the full uplift required to meet the full affordable housing need (Option 4).

### **1. Is this option achievable given market demand?**

- 4.58 Option 3 would provide more homes than required to meet the SHMA 'all homes' requirement, providing an additional 700 units, an extra 10% over and above the full market assessed housing need, and it would meet more of the affordable housing needs. This option would deliver 385 homes per year which is higher than the delivery rate over the last 10 years (averaging 342 homes per annum 2004-2014), but lower than delivery recorded in two specific years (2007-2008: 549 units, and 2009-2010: 454 units).

### **2. Is this option sustainable?**

- 4.59 Option 3 would ensure sufficient land would be identified to build a strong, responsive and competitive economy. The annual build rate would be higher than the average rate for the past 10 years.
- 4.60 In terms of meeting the social role, although this option would fall short of meeting the identified affordable needs of the district it would meet the full objectively assessed housing and affordable housing needs.
- 4.61 This option is capable of according with the environmental role as demonstrated by evidence below.
- 4.62 The three are strands of sustainability mutually dependant and therefore it is necessary to satisfy all three to meet the requirements of the NPPF. This option is considered to satisfy all three and is therefore considered to be a sustainable option.

### **3. Is this option achievable given environmental constraints?**

- 4.63 It is considered that this option is achievable given the environmental constraints set out in paragraph 4.21 and the approach taken in the SHLAA (paragraph 4.22 above).

### **4. Is there sufficient supply of sites (SHLAA) for this option?**

- 4.64 Yes – see paragraphs 4.23 and 4.24 above.

### **5. Is this option achievable given infrastructure constraints?**

- 4.65 The draft IDP 2015 indicates that there is unlikely to be any infrastructure capacity "show stoppers" that would prevent delivery of the SHMA 'all homes' requirement for 7000 homes. However, the higher levels of growth in Options 3 and 4 would be more challenging to meet. The ability to deliver Option 3 would depend on environmental, economic, site specific and viability constraints. The geography of distribution is also an important factor in the potential to deliver this option. For example, if a high level of growth is directed to a settlement with limited existing infrastructure, or where it hits a trigger point requiring significant investment in new or improved infrastructure, this could result in a "show

stopper” to delivery. Growth Option 3 may rely on a number of strategic sites coming forward requiring significant infrastructure investment which would, in turn, be likely to result in long lead-in times, which may make it difficult to deliver all the homes within the plan period.

- 4.66 The IDP is an iterative process and will explore infrastructure requirements of the planned level of housing growth through the different stages of the plan preparation.

## **6. Does this option fit with CS1 and other local and national policies?**

- 4.67 Option 3 would accord with NPPF requirement to meet the full objectively assessed need for market and affordable housing. This option would fit with the Government’s objective to significantly boost the supply of housing (NPPF para 47).
- 4.68 It would achieve 106 affordable units each residual year on the assumption that the full 30% policy CS9 affordable housing target can be delivered by market housing led developments. This is lower than the 138 needed each residual year, and given past evidence of delivery, it seems unlikely that this level of affordable homes would be achieved for each remaining year of the plan period.
- 4.69 Option 3 has the potential to be delivered in accordance with policy CS1 and other local plan policies and would meet the full objectively assessed market and affordable housing need, but not the full affordable need.

## **Conclusion**

- 4.70 This option is considered to be a reasonable one to include for consultation at this issues and options stage as it meets the SHMA ‘all homes’ requirement, as well as more of the affordable housing need. It reflects a level of housing delivery which although higher than the average achieved over the last 10 years, represents a reasonable uplift on market signals. Evidence suggests there are sufficient sites available to accommodate this level of growth having regard to environmental constraints, sustainability considerations, and although infrastructure provision could present challenges it is not considered likely to be a “show stopper”.
- 4.71 As the plan moves forward to the preferred options stage further work will be undertaken to evaluate the appropriateness of this level of housing provision alongside further iterations of the SA and IDP, having regard to the outcome of the consultation process, the refinement of the distribution options, and other supporting updated evidence.

## **Option 4 – Meeting full affordable housing need**

- 4.72 An increase in overall housing provision to meet the affordable need of 2703 homes, would require the district to plan for at least an additional

2700 homes, giving a total need of 9700 homes (rounded), in order to need the full affordable housing need, instead of the 7000 homes (SHMA) figure.

- 4.73 This option assumes a residual figure of 8000 homes. If 30% affordable provision is applied to this figure 2400 affordable homes could be delivered. When considered against those affordable units already planned for (353), this has the potential to meet the full affordable need of 2703 affordable units (albeit the overall requirement has been rounded). It should be noted no allowance has been made for rural exception sites and the contribution they make.

### **1. Is this option achievable given market demand?**

- 4.74 Option 4 would represent a very large increase on the number of homes provided, over and above that required by the SHMA, providing an additional 2700 units. However, it has the potential to meet the full affordable housing need of the district.
- 4.75 This option could deliver 470 homes for each remaining year of the plan period which is significantly higher than the average delivery rate over the last 10 years (averaging at 342 homes per annum 2004-2014). This growth option, with the exception of monitoring year 2007-2008 when 549 homes were built, is higher than has been achieved in a single year over the last 14 years.
- 4.76 However, it should be noted that this option could only be delivered if there is market demand for this level of new homes. So this option may not have the desired effect of increasing affordable homes if there is no demand for the market homes needed to deliver them.

### **2. Is this option sustainable?**

- 4.77 This option may conflict with the economic thread of sustainable development as it would require significantly more land for housing provision, and this would not align with planned employment provision, and this level of growth would require significant infrastructure to support it. The annual build rate required would be significantly higher than the average rate for the past 10 years.
- 4.78 In terms of the social thread Option 4 would provide more housing than required to meet the 'all homes' housing need, and would meet in full the identified affordable needs of the district. 2700 additional homes would be provided presenting a 38% increase on the need identified in the SHMA. It is equivalent in scale to all the homes in Red Lodge in 2014 (based on housing stock figures). It would require significant growth across the district. As the affordable provision is to be delivered through market housing schemes it would result in considerably more market housing beyond the identified need. This level of growth would require considerable additional infrastructure to support it.

- 4.79 This option is expected to compromise the environmental role given the environmental constraints that limit development in the district.
- 4.80 This option does not satisfy all three sustainability strands and is therefore not a sustainable option.

### **3. Is this option achievable given environmental constraints?**

- 4.81 Given this option requires large-scale growth it is considered that it would not be achievable given the environmental constraints that limit development in the district (see paragraph 4.21).

### **4. Is there sufficient supply of sites (SHLAA) for this option?**

- 4.82 Yes – see paragraphs 4.23 and 4.24 above.

### **5. Is this option achievable given infrastructure constraints?**

- 4.83 The draft IDP 2015 indicates that there is unlikely to be any infrastructure capacity “show stoppers” that would prevent delivery of the SHMA ‘all homes’ requirement for 7000 homes. However, the higher levels of growth, options 3 and 4 would be more challenging to meet, particularly option 4 for 9700 homes. The ability to deliver Option 4 would depend on environmental, economic, site specific and viability constraints. The geography of distribution is also an important factor in the potential to deliver this option. For example, if a high level of growth is directed to a settlement with limited existing infrastructure, or where it hits a trigger point requiring significant investment in new or improved infrastructure, this could result in a “show stopper” to delivery. The higher growth Option 4 may rely on a number of strategic sites coming forward requiring significant infrastructure investment which would, in turn, be likely to result in long lead-in times, which may make it difficult to deliver all the homes within the plan period.
- 4.84 The IDP is an iterative process and will explore infrastructure requirements of the planned level of housing growth through the different stages of the plan preparation.

### **6. Does this option fit with CS1 and other local and national policies?**

- 4.85 This option would accord with NPPF requirement to meet the full objectively assessed need for market and affordable housing and the Government’s objective to significantly boost the supply of housing (NPPF para 47). It would achieve 141 affordable units each residual year, which would enable the full affordable need to be met.
- 4.86 Option 4 has the potential to be delivered in accordance with policy CS1, but is likely to compromise other local plan policies and national policy to protect sites of nature conservation interest and is therefore likely to be unsustainable.

## Conclusion

- 4.87 In order to accord with the settlement hierarchy, infrastructure and environmental constraints, sustainability considerations and with all other national and local policy requirements, the number of sites suitable for consideration within the context of the SIR is considerably reduced from the capacity shown in the SHLAA.
- 4.88 Market and viability issues mean that the scale of growth in Option 4 is not considered deliverable, as it would require levels of growth higher than achieved before in the district. In addition, the infrastructure requirements to support this level of growth would be challenging to meet and there is no certainty this could be achieved, particularly as it would predominantly be delivered through developer led schemes. This level of growth could not be accommodated in the district within the policy framework, and therefore it is not considered reasonable to include Option 4 in the issues and options consultation.

## Options carried forward to the SIR

- 4.89 The table below summarises the key figures for the total amount of additional homes required over the remaining seventeen years of the plan period, and the amount of affordable housing that would be delivered through the four options set out above:

	*Additional homes required over the remainder of the plan period 2014 – 2031 (Residual figure)	Residual figure per annum	Affordable Housing delivered assuming CS9 30% target on all sites over 10 dwellings
Option 1	4200	247	1260 (74 p.a.)
Option 2	5300	311	1590 (93 p.a.)
Option 3	6000	353	1800 (106 p.a.)
Option 4	8000	470	2400 (141 p.a.)

\*Note: No allowance is made for windfall

- 4.90 Options 2 and 3 are carried forward to the SIR (Regulation 18) consultation, and renamed as Options 1 and 2.
- 4.91 Options 1 and 4 do not comply with the criteria assessment undertaken above so have been discounted. They do not represent reasonable alternatives so will not be taken forward to the SIR consultation.

## 5. Distribution of housing provision – justification of approach

- 5.1 Once the options for the amount of housing were identified, options for the distribution of this housing between settlements were developed. The

four distribution options subject to this Issues and Options consultation can be seen in section 5 of the Single Issue Review document.

- 5.2 It should be recognised that this is an early stage of the process for defining an appropriate distribution strategy. Following assessment of responses to the current consultation the next step will be to refine the options and assess these. Consultation on the council's preferred option will follow this, so it is important to recognise that the final option submitted for examination could be a combination of the options currently out for consultation or, having taken into account emerging evidence (including information received as part of these consultations), it could follow a different approach from that which has led to the current options.
- 5.3 The distribution options were worked up in light of the need to consider options that are realistic, deliverable and consistent with national and local planning policy. A variety of different factors were taken into account in the development of these options, outlined in more detail below.

### **National and local policy context**

- 5.4 One of the core planning principles in the National Planning Policy Framework is to:
- “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which can be made sustainable.”
- 5.5 Whilst the 2010 Forest Heath Core Strategy was adopted prior to the introduction of the NPPF, it establishes a settlement hierarchy under Policy CS1 (see section 5 of the Single Issue Review consultation document) which actively seeks to manage sustainable patterns of growth by directing housing and employment to those settlements with a good range of services and facilities, and is therefore in accordance with the NPPF.
- 5.6 It was therefore important that the distribution options were developed in the context of the existing settlement hierarchy, together with other local and national policies, to ensure they reflected a sustainable pattern of growth. Only sites in or adjacent to towns, key service centres and primary villages were considered within the context of developing the distribution options to ensure accordance with Policy CS1 and the NPPF.

### **Available, achievable and deliverable sites**

- 5.7 The information in the SHLAA was taken one stage further in the development of the settlement-specific growth ranges and district wide options with the aim of providing a more realistic picture of suitability/availability. The growth ranges were developed and tested to ensure that they were realistic and achievable in terms of available and deliverable sites using the following criteria:

- Only included sites in or adjacent to towns, key service centres and primary villages to ensure accordance with Policy CS1 of the Core Strategy
- Both included and deferred SHLAA sites were considered, with some deferred sites included in the development of estimates where it was considered likely that evidence from landowners/developers/statutory consultees would indicate that constraints may be overcome
- Excluded sites below 10 dwellings (as these will be counted as windfall and won't be allocated)
- Density – 30 dwellings per hectare was applied except where circumstances suggest an alternative density would be more appropriate including:
  - strategic sites over 100 dwellings - 60% of the site will be calculated at 30 dwellings per hectare to allow for infrastructure provision on site (evidenced by Natural England Sites of Special Scientific Interest (SSSI) impact zone setting limit for sites over 100 dwellings);
  - mixed use sites - a lower density will be assumed reflecting the proportion of the site likely to be available for residential development, or 60% of the site at a density of 30 dwellings per hectare may be appropriate;
  - on sites below 100 dwellings 30 dwellings per hectare is likely to be appropriate unless obvious constraints are known e.g. the site is extensively covered by mature trees and a tree preservation order has been applied.
- Where there is a current application (e.g. with resolution to grant permission) the dwelling number on the application was used, as this reflects what is deliverable.

### **Environmental constraints**

- 5.8 Section 4 of the Single Issue Review of Core Strategy Policy CS7 lists the key environmental constraints in the towns, key service centres and primary villages. As set out in paragraph 4.21 above, almost half of the district is designated for nature conservation value.
- 5.9 Ideally, the distribution of housing across the district would not impact on any environmental constraints. The council has planning policies in place to ensure that development does not have an adverse impact on the natural environment, for example, Policy CS2 of the Core Strategy restricts new built development around the Breckland SPA unless it can be demonstrated that development would not have an adverse effect on the integrity of the SPA.
- 5.10 The town of Brandon is particularly constrained by the Breckland SPA and associated buffer zones defined under Policy CS2 of the Core Strategy, and as paragraph 4.7 of the Single Issue Review states, the only reasonable option for future development at this time is 'low growth' unless it can be demonstrated that there are no adverse effects of development on the integrity of the SPA. If, through this consultation and



consultation on the Site Allocations Local Plan, it can be demonstrated that sites in Brandon could be developed without adverse effects, the 'low growth' option will be revisited in light of the information received.

- 5.11 The key service centre of Red Lodge is constrained to the east by the Breckland SPA and associated buffer zones defined under Policy CS2 of the Core Strategy. There are sites in the SHLAA that lie partly within and adjacent to the SPA buffer zones. Whilst such sites have been deferred on the basis of potential adverse impact on the SPA, it may be that parts of the sites which lie outside of the buffer zones could come forward for development without any adverse effect. These issues have been taken into consideration in the development of the growth ranges for Red Lodge and have an enabled a 'very high' growth range to be tested.
- 5.12 **These issues were taken into account in working up the distribution options to ensure that the growth ranges for each settlement could be delivered within the context of known constraints and existing national and local planning policy requirements.**

#### **Evidence from the 2009 Infrastructure and Environmental Capacity Appraisal and the draft Infrastructure Delivery Plan**

- 5.13 Consideration of the four options in Section of 4 of this paper demonstrate that the higher levels of growth in Options 3 and 4 would be more challenging to meet, particularly Option 4 for 9700 homes. This is explored further in paragraphs 4.68 and 4.88 above.
- 5.14 The IECA identified 'opportunity areas' (areas where growth would be appropriate) using a methodology that included a filtering process that allowed for the unique characteristics of Forest Heath to play a key role. This provided detailed geographic information that was interpreted with other factors including the protection of sensitive areas, the prevention of coalescence, and the cumulative impacts of growth.
- 5.15 It should noted that the Forest Heath SHLAA has more available sites in primary villages than could reasonably be allocated, when considering the capacity of these villages as identified in the IECA. The capacities of these settlements have been taken into account in the overall estimates of available sites in primary villages, which in turn has helped informed the development of the growth ranges and distribution options.

#### **Existing commitments and completions**

- 5.16 The Core Strategy plan period runs from 2011-2031. From 2011 to 2014 1700 homes have either been built, or are planned to be built in the district (see table 1). It is important that these commitments and completions are taken into account when considering the amount of growth appropriate in each settlement to ensure that the remaining distribution is proportionate in relation to the status of the settlement in

the hierarchy, its size (existing numbers of homes, also known as 'housing stock'), and capacity, as outlined in the IECA and the draft IDP.

5.17 For example, some of the primary villages, such as Kentford, have already seen a medium/high level of growth through planning approvals on SHLAA sites since 2011 in relation to their existing housing stock. **This growth was taken into account in the development of the options, so it may mean that some settlements have already achieved the level of growth set out in the option.**

5.18 Table 1 shows the commitment and completions by settlement at 31<sup>st</sup> March 2014. These figures have already been planned for, so will not be distributed in the context of the SIR, but will count towards meeting the overall plan requirement. See paras 3.13-3.14 of the SIR which explain how the distribution options only plan for the residual need, i.e. exclude the 1700 homes (rounded) already planned for.

<b>Table 1: Housing commitments and completions by settlement (2011-2014)</b>			
<b>Settlement</b>	<b>Completions (A) 2011-2014</b>	<b>Commitments (B) at 31<sup>st</sup> March 2014</b>	<b>(A) and (B)</b>
Brandon	38	49	87
Mildenhall	1	68	69
Newmarket	115	133	248
Lakenheath	36	31	67
Red Lodge	487	196	683
Beck Row	165	10	175
Exning	13	138	151
Kentford	38	26	64
West Row	23	17	40
Elsewhere	23	94	117
<b>Totals</b>	<b>939</b>	<b>762</b>	<b>1701</b>

5.19 Table 2 shows the commitment and completions which have emerged since 31<sup>st</sup> March 2014 (i.e. since the figures shown in table 1 above). These already count towards meeting some of the distribution options and explain why for some settlements particular options have been shown. In the next preferred options consultation on this document, updated figures will be provided and a new base date of 31<sup>st</sup> March 2015 will be used. A full update to show extant consents at 31<sup>st</sup> March 2015 will also be reported at that time.

**Table 2: Housing commitments and completions by settlement arising since 31.3.2014**

<b>Settlement</b>	<b>Completions 1.4.14 to 31.3.15 (C)</b>	<b>Commitments 1.4.14 to 30.6.15 (D)</b>	<b>C and D</b>	<b>Percentage growth against housing stock (housing stock at 2014)</b>
Brandon	1	12	13	0.3%
Mildenhall	39	89	128	2%
Newmarket	11	29	40	0.5%
Lakenheath	5	5	10	0.4%
Red Lodge	77	10	87	3%
Beck Row	0	137	137	5%
Exning	7	4	11	1%
Kentford	0	119	119	41%
West Row	0	27	27	3%
Elsewhere	16	75	91	Not known
<b>Totals</b>	<b>156</b>	<b>507</b>	<b>663</b>	

5.20 In addition to the commitments and completion shown in table 2 above there are a number of planning applications which have yet to be determined, or which have a resolution to grant planning permission (subject to completion of legal agreements). These are referred to in the settlements sections of the SIR. Regard has been given to these in considering the distribution options.

### **Distribution options**

5.21 The four distribution options are possible approaches to the district-wide distribution of housing. **The justification for the settlement growth ranges within the options is rooted in the ability of the option as a whole to deliver the required growth to meet the housing needs in the district.** The four tables below set out justification for the growth ranges for each settlement within each of the options based on the factors set out in the paragraphs above. This means that in all distribution options Brandon has "low growth" (see paragraph 5.10 above), and Kentford has "high growth" (paragraph 5.17). The terms "low", "medium", "high", and "very high" used to describe growth levels in these tables relate to the amount of growth proposed relative to the existing size of the settlement (the housing stock). These ranges, and what they mean in terms of a percentage increase of the overall housing in the settlement, are also set out in the following table:

<b>Level of growth</b>	<b>Percentage increase in existing housing stock</b>
Low growth	Between 1 – 10% increase in existing housing stock
Medium growth	Between 10 – 15% increase in housing stock
High growth	15% + increase in housing stock
Very high growth	50% + increase in housing stock

<b>Settlement</b>	<b>1. Focus on Mildenhall, Newmarket and Lakenheath</b>
	<b>This option recognises the environmental constraints at Brandon, and focuses growth on Mildenhall, Newmarket and Lakenheath. Levels of growth in the primary villages would be high in Kentford, which relates to permissions already approved in the village, and medium in Exning which again relates to existing planning approvals. Growth would be low in Beck Row and West Row. Further detail on how existing planning approvals have affected the growth options for each settlement can be found in the Single Issue Review technical report which accompanies this document.</b>
<b>Brandon</b>  (2014 housing stock 4669)	Low growth  (50 – 55)
<b>Explanation for growth ranges</b>	Brandon is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for growth. However, it is tightly constrained by environmental designations. The IECA indicates that the settlement has the opportunity for 630-1000 homes, but this needs to be set in the context of the existing environmental designations and national and local policy constraints. The SHLAA indicates that there are only sufficient available and deliverable sites to deliver a low level of growth at this time, unless it can be demonstrated that there are no adverse effects of development on the integrity of the SPA. If, through this consultation and consultation on the Site Allocations Local Plan, it can be demonstrated that sites in Brandon could be developed without adverse effects the 'low growth' option will be revisited in light of the information received.
<b>Mildenhall</b>  (2014 housing stock 5617)	High growth  (1600 – 1770)
<b>Explanation for growth ranges</b>	Mildenhall is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity to the west for 3000-5360 homes, 240-420 homes in the central area and 100-180 homes to the east. This demonstrates that the high growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth range in this option.
<b>Newmarket</b>  (2014 housing stock 8167)	High growth  (1470 – 1630)
<b>Explanation for growth ranges</b>	Newmarket is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The ICEA indicates that the settlement has the opportunity for 360-630 homes in the central part of the town and for 1200-2100 homes around Hatchfield Farm. This demonstrates that the high growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth range in this option.

<b>Settlement</b>	<b>1. Focus on Mildenhall, Newmarket and Lakenheath</b>
<b>Lakenheath</b>  (2014 housing stock 2756)	High growth (880 - 975)
<b>Explanation for growth ranges</b>	Lakenheath is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 1200-2140 homes to the north, 600-1050 homes in the central part of the settlement, 640-1120 homes to the east and 200-350 homes to the south. However, this capacity needs to be set within the context of the settlement's designation as a key service centre and the environmental constraints to the east. Since 2011, Lakenheath has seen a number of homes committed through 'minded to grant' permissions, although the final decisions have not been made. This already equates to a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.
<b>Red Lodge</b>  (2014 housing stock 2760)	Medium growth  (360 - 400)
<b>Explanation for growth ranges</b>	Red Lodge is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 600-1050 homes to the west, 200-350 homes to the north and 340-600 homes to the south. This demonstrates that the medium growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the medium growth in this option.
<b>Beck Row</b>  (2014 housing stock 2786)	Low growth  (110 - 120)
<b>Explanation for growth ranges</b>	Beck Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-420 homes around the central part of the settlement. This demonstrates that the low growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the low growth in this option. Since 2011, Beck Row has already seen a low level of growth in comparison to the existing housing stock.
<b>West Row</b>  (2014 housing stock 776)	Low growth  (65 - 70)

<b>Settlement</b>	<b>1. Focus on Mildenhall, Newmarket and Lakenheath</b>
<b>Explanation for growth ranges</b>	West Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 140-250 homes to infill existing gaps in the dispersed settlement structure. This demonstrates that the low growth range in this option is appropriate and would accord with the settlement's status as a primary village. There are available sites in the SHLAA on environmentally unconstrained land to deliver the low growth in this option.
<b>Exning</b>  (2014 housing stock 967)	Medium growth  (135 - 150)
<b>Explanation for growth ranges</b>	Exning is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate a strategic site extension to the west with a potential range of 1240-2170 homes. However, apportioning this level of growth to Exning would not accord with its status as a primary village. Since 2011, Exning has seen a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.
<b>Kentford</b>  (2014 housing stock 293)	High growth  (130 - 140)
<b>Explanation for growth ranges</b>	Kentford is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-440 homes on small strategic sites to infill existing gaps in the settlement structure. Since 2011, Kentford has seen a high level of growth in comparison to the existing housing stock. Because this high level of growth has already been achieved in the plan period, low or medium growth ranges for the settlement could not be considered in the context of this single issue review consultation.

<b>Settlement</b>	<b>2. Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge, and medium growth at Mildenhall and Newmarket</b>
	This option sees high levels of growth at both Lakenheath and Red Lodge. This option assumes Red Lodge has the capacity to expand with a second planned extension to the village. There would be medium levels of growth at Mildenhall and Newmarket (with the low level of growth at Brandon that reflects the environmental constraints). Levels of growth in the primary villages would be high in Kentford which relates to permissions already approved in the village, and medium in Exning, which again relates to existing planning approvals. Growth would be low in Beck Row and West Row. Further detail on how existing planning approvals have affected the growth options for each settlement can be found in the Single Issue Review technical report which accompanies this document.
<b>Brandon</b>  (2014 housing stock 4669)	Low growth (50 – 55)
<b>Explanation for growth ranges</b>	Brandon is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for growth, however, it is tightly constrained by environmental designations. The IECA indicates that the settlement has the opportunity for 630-1000 homes, but this needs to be set in the context of the existing environmental designations and national and local policy constraints. The SHLAA indicates that there are only sufficient available and deliverable sites to deliver a low level of growth at this time, unless it can be demonstrated that there are no adverse effects of development on the integrity of the SPA. If, through this consultation and consultation on the Site Allocations Local Plan, it can be demonstrated that sites in Brandon could be developed without adverse effects the 'low growth' option will be revisited in light of the information received.
<b>Mildenhall</b>  (2014 housing stock 5617)	Medium growth <sup>1</sup>  (1145 – 1270)
<b>Explanation for growth ranges</b>	Mildenhall is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity to the west for 3000-5360 homes, 240-420 homes in the central area and 100-180 homes to the east. This demonstrates that the medium growth range in this option can be achieved, with opportunity for a higher level of growth if required. There are available sites in the SHLAA on environmentally unconstrained land to deliver the medium growth range in this option.

<sup>1</sup> The Mildenhall medium growth does not fall within the % range of 10-15%, however it is considered appropriate to show it as medium in the table, to represent a lower growth range than the high growth range shown for options 1, 3 and 4. See the summary of distribution table on page 28 of the SIR.

<b>Settlement</b>	<b>2. Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge, and medium growth at Mildenhall and Newmarket</b>
<b>Newmarket</b>  (2014 housing stock 8167)	Medium growth <sup>2</sup>  (680 – 750)
<b>Explanation for growth ranges</b>	Newmarket is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The ICEA indicates that the settlement has the opportunity for 360-630 homes in the central part of the town and for 1200-2100 homes around Hatchfield Farm. This demonstrates that the medium growth range in this option can be achieved, with opportunity for a higher level of growth if required. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth range in this option.
<b>Lakenheath</b>  (2014 housing stock 2756)	High growth (880 – 975)
<b>Explanation for growth ranges</b>	Lakenheath is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 1200-2140 homes to the north, 600-1050 homes in the central part of the settlement, 640-1120 homes to the east and 200-350 homes to the south. However, this capacity needs to be set within the context of the settlement's designation as a key service centre and the environmental constraints to the east. Since 2011, Lakenheath has seen a number of homes committed through 'minded to grant' permissions, although the final decisions have not been made. This already equates to a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.
<b>Red Lodge</b>  (2014 housing stock 2760)	Very high growth  (1970 – 2170)
<b>Explanation for growth ranges</b>	Red Lodge is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 600-1050 homes to the west, 200-350 homes to the north and 340-600 homes to the south. This demonstrates that the very high growth range in this option is appropriate. However, this needs to be considered within the context of Red Lodge's current status in

<sup>2</sup> The Newmarket medium growth does not fall within the % range of 10-15%, however it is considered appropriate to show it as medium in the table, as it represents a medium option falling between the high and low ranges shown for options 1, 3 and 4. See the summary of distribution table on page 28 of the SIR.



<b>Settlement</b>	<b>2. Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge, and medium growth at Mildenhall and Newmarket</b>
	the settlement hierarchy as a key service centre, whilst taking into account that this level of growth would deliver additional infrastructure, services and facilities. There are available sites in the SHLAA on environmentally unconstrained land to deliver the very high growth in this option.
<b>Beck Row</b>  (2014 housing stock 2786)	Low growth (110 – 120)
<b>Explanation for growth ranges</b>	Beck Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-420 homes around the central part of the settlement. This demonstrates that the low growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the low growth in this option. Since 2011, Beck Row has already seen a low level of growth in comparison to the existing housing stock.
<b>West Row</b>  (2014 housing stock 776)	Low growth (65- 70)
<b>Explanation for growth ranges</b>	West Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 140-250 homes to infill existing gaps in the dispersed settlement structure. This demonstrates that the low growth range in this option is appropriate and would accord with the settlement's status as a primary village. There are available sites in the SHLAA on environmentally unconstrained land to deliver the low growth in this option.
<b>Exning</b>  (2014 housing stock 967)	Medium growth (135 – 150)
<b>Explanation for growth ranges</b>	Exning is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate a strategic site extension to the west with a potential range of 1240-2170 homes. However, apportioning this level of growth to Exning would not accord with its status as a primary village. Since 2011, Exning has seen a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.

<b>Settlement</b>	<b>2. Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge, and medium growth at Mildenhall and Newmarket</b>
<b>Kentford</b>  (2014 housing stock 293)	High growth (130 – 140)
<b>Explanation for growth ranges</b>	Kentford is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-440 homes on small strategic sites to infill existing gaps in the settlement structure. Since 2011, Kentford has seen a high level of growth in comparison to the existing housing stock. Because this high level of growth has already been achieved in the plan period, low or medium growth ranges for the settlement could not be considered in the context of this single issue review consultation.

<b>Settlement</b>	<b>3. Focus on Red Lodge, with a planned extension, and focus on Lakenheath and Mildenhall with lower growth in Newmarket</b>
	<b>This option would meet the district's housing requirements by allocating higher levels of growth at Red Lodge. This option assumes Red Lodge has the capacity to expand with a second planned extension to the village. There would also be high growth at Lakenheath and Mildenhall. Levels of growth in the primary villages would be high in Kentford which relates to permissions already approved in the village, and medium in Exning, which again relates to existing planning approvals. Growth would be low in Beck Row and West Row. Further detail on how existing planning approvals have affected the growth options for each settlement can be found in the technical report which accompanies this document.</b>
<b>Brandon</b>  (2014 housing stock 4669)	Low growth (50 - 55)
<b>Explanation for growth ranges</b>	Brandon is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for growth, however, it is tightly constrained by environmental designations. The IECA indicates that the settlement has the opportunity for 630-1000 homes, but this needs to be set in the context of the existing environmental designations and national and local policy constraints. The SHLAA indicates that there are only sufficient available and deliverable sites to deliver a low level of growth at this time, unless it can be demonstrated that there are no adverse effects of development on the integrity of the SPA. If, through this consultation and consultation on the Site Allocations Local Plan, it can be demonstrated that sites in Brandon could be developed without adverse effects the 'low growth' option will be revisited in light of the information received.
<b>Mildenhall</b>  (2014 housing stock 5617)	High growth (1600 - 1770)
<b>Explanation for growth ranges</b>	Mildenhall is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity to the west for 3000-5360 homes, 240-420 homes in the central area and 100-180 homes to the east. This demonstrates that the high growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth range in this option.
<b>Newmarket</b>  (2014 housing stock 8167)	Low growth  (300 - 330)

<b>Settlement</b>	<b>3. Focus on Red Lodge, with a planned extension, and focus on Lakenheath and Mildenhall with lower growth in Newmarket</b>
<b>Explanation for growth ranges</b>	Newmarket is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The ICEA indicates that the settlement has the opportunity for 360-630 homes in the central part of the town and for 1200-2100 homes around Hatchfield Farm. This demonstrates that the low growth range in this option can be achieved, with opportunity for a medium/higher level of growth if required. However, the low growth range needs to be considered in the context of Newmarket's status as a town in the settlement hierarchy and whether this is an appropriate level of growth for the settlement with the largest housing stock in the district. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth range in this option.
<b>Lakenheath</b>  (2014 housing stock 2756)	High growth (880 – 975)
<b>Explanation for growth ranges</b>	Lakenheath is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 1200-2140 homes to the north, 600-1050 homes in the central part of the settlement, 640-1120 homes to the east and 200-350 homes to the south. However, this capacity needs to be set within the context of the settlement's designation as a key service centre and the environmental constraints to the east. Since 2011, Lakenheath has seen a number of homes committed through 'minded to grant' permissions, although the final decisions have not been made. This already equates to a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.
<b>Red Lodge</b>  (2014 housing stock 2760)	Very high growth  (1970 – 2170)
<b>Explanation for growth ranges</b>	Red Lodge is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 600-1050 homes to the west, 200-350 homes to the north and 340-600 homes to the south. This demonstrates that the very high growth range in this option is appropriate. However, this needs to be considered within the context of Red Lodge's current status in the settlement hierarchy as a key service centre, whilst taking into account that this level of growth would deliver additional infrastructure, services and facilities. There are available sites in the SHLAA on environmentally unconstrained land to deliver the very high growth in this option.

<b>Settlement</b>	<b>3. Focus on Red Lodge, with a planned extension, and focus on Lakenheath and Mildenhall with lower growth in Newmarket</b>
<b>Beck Row</b>  (2014 housing stock 2786)	Low growth (110 – 120)
<b>Explanation for growth ranges</b>	Beck Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-420 homes around the central part of the settlement. This demonstrates that the low growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the low growth in this option. Since 2011, Beck Row has already seen a low level of growth in comparison to the existing housing stock.
<b>West Row</b>  (2014 housing stock 776)	Low growth (65- 70)
<b>Explanation for growth ranges</b>	West Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 140-250 homes to infill existing gaps in the dispersed settlement structure. This demonstrates that the low growth range in this option is appropriate and would accord with the settlement's status as a primary village. There are available sites in the SHLAA on environmentally unconstrained land to deliver the low growth in this option.
<b>Exning</b>  (2014 housing stock 967)	Medium growth (135 – 150)
<b>Explanation for growth ranges</b>	Exning is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate a strategic site extension to the west with a potential range of 1240-2170 homes. However, apportioning this level of growth to Exning would not accord with its status as a primary village. Since 2011, Exning has seen a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.
<b>Kentford</b>  (2014 housing stock 293)	High growth (130 – 140)

<b>Settlement</b>	<b>3. Focus on Red Lodge, with a planned extension, and focus on Lakenheath and Mildenhall with lower growth in Newmarket</b>
<b>Explanation for growth ranges</b>	Kentford is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-440 homes on small strategic sites to infill existing gaps in the settlement structure. Since 2011, Kentford has seen a high level of growth in comparison to the existing housing stock. Because this high level of growth has already been achieved in the plan period, low or medium growth ranges for the settlement could not be considered in the context of this single issue review consultation.

<b>Settlement</b>	<b>4. Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity</b>
	<b>This option would meet the district's housing requirements by broadly following the hierarchy of settlements set out in Core Strategy Policy CS1 focussing the higher levels of growth in the most sustainable settlements (with the exception of the constrained low level at Brandon). This means higher levels of growth at Mildenhall, Newmarket and Red Lodge, with medium growth in Lakenheath. Levels of growth in the two larger primary villages would be high in West Row and medium in Beck Row. Levels of growth would be high in Kentford which relates to permissions already approved in the village, and medium in Exning, which again relates to existing planning approvals. Further detail on how existing planning approvals, since 2011, have affected the growth options for each settlement can be found in the technical report.</b>
<b>Brandon</b>  (2014 housing stock 4669)	Low growth (50 - 55)
<b>Explanation for growth ranges</b>	Brandon is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for growth, however, it is tightly constrained by environmental designations. The IECA indicates that the settlement has the opportunity for 630-1000 homes, but this needs to be set in the context of the existing environmental designations and national and local policy constraints. The SHLAA indicates that there are only sufficient available and deliverable sites to deliver a low level of growth at this time, unless it can be demonstrated that there are no adverse effects of development on the integrity of the SPA. If, through this consultation and consultation on the Site Allocations Local Plan, it can be demonstrated that sites in Brandon could be developed without adverse effects the 'low growth' option will be revisited in light of the information received.
<b>Mildenhall</b>  (2014 housing stock 5617)	High growth (1600 - 1770)
<b>Explanation for growth ranges</b>	Mildenhall is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity to the west for 3000-5360 homes, 240-420 homes in the central area and 100-180 homes to the east. This demonstrates that the high growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth range in this option.
<b>Newmarket</b>  (2014 housing stock 8167)	High growth  (1470 - 1630)

<b>Settlement</b>	<b>4. Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity</b>
<b>Explanation for growth ranges</b>	Newmarket is designated as a town in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The ICEA indicates that the settlement has the opportunity for 360-630 homes in the central part of the town and for 1200-2100 homes around Hatchfield Farm. This demonstrates that the high growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth range in this option.
<b>Lakenheath</b>  (2014 housing stock 2756)	Medium growth (410 - 460)
<b>Explanation for growth ranges</b>	Lakenheath is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 1200-2140 homes to the north, 600-1050 homes in the central part of the settlement, 640-1120 homes to the east and 200-350 homes to the south. However, this capacity needs to be set within the context of the settlement's designation as a key service centre and the environmental constraints to the east. Since 2011, Lakenheath has seen enough homes committed through 'minded to grant' permissions, although the final decisions have not been made, to equate to a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.
<b>Red Lodge</b>  (2014 housing stock 2760)	High growth  (735 - 810)
<b>Explanation for growth ranges</b>	Red Lodge is designated as a key service centre in Policy CS1 of the Core Strategy and is a sustainable location for further growth. The IECA indicates that the settlement has the opportunity for 600-1050 homes to the west, 200-350 homes to the north and 340-600 homes to the south. This demonstrates that the high growth range in this option is appropriate. However, this needs to be considered within the context of Red Lodge's current status in the settlement hierarchy as a key service centre. There are available sites in the SHLAA on environmentally unconstrained land to deliver the high growth in this option.
<b>Beck Row</b>  (2014 housing stock 2786)	Medium growth  (320 - 350)



<b>Settlement</b>	<b>4. Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity</b>
<b>Explanation for growth ranges</b>	Beck Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-420 homes around the central part of the settlement. This demonstrates that the medium growth range in this option is appropriate. There are available sites in the SHLAA on environmentally unconstrained land to deliver the medium growth in this option. However, this needs to be considered in the context of Beck Row's designation as a primary village in the settlement hierarchy.
<b>West Row</b>  (2014 housing stock 776)	High growth  (290 – 320)
<b>Explanation for growth ranges</b>	West Row is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 140-250 homes to infill existing gaps in the dispersed settlement structure. Higher levels of growth has little merit in some respects, given the limited services/facilities locally and the likelihood of high car dependency; however, sites are being promoted in the SHLAA at locations that are relatively unconstrained from an environmental perspective, and hence higher growth options are worthy of consideration.
<b>Exning</b>  (2014 housing stock 967)	Medium growth  (135 – 150)
<b>Explanation for growth ranges</b>	Exning is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate a strategic site extension to the west with a potential range of 1240-2170 homes. However, apportioning this level of growth to Exning would not accord with its status as a primary village. Since 2011, Exning has seen a medium level of growth in comparison to the existing housing stock. Because this medium level of growth has already been achieved in the plan period, low growth ranges for the settlement could not be considered in the context of this single issue review consultation.
<b>Kentford</b>  (2014 housing stock 293)	High growth  (130 – 140)

<b>Settlement</b>	<b>4. Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity</b>
<b>Explanation for growth ranges</b>	Kentford is designated as a primary village, in Policy CS1 of the Core Strategy, and provides basic local services and will accommodate small scale housing growth to meet local needs. The IECA indicates that there is the opportunity to accommodate 240-440 homes on small strategic sites to infill existing gaps in the settlement structure. Since 2011, Kentford has seen a high level of growth in comparison to the existing housing stock. Because this high level of growth has already been achieved in the plan period, low or medium growth ranges for the settlement could not be considered in the context of this single issue review consultation.

## Glossary

<b>Abbreviation</b>	<b>Full title</b>	<b>Description</b>
<b>AMR</b>	Annual Monitoring Report	The report produced every year on the progress of preparing the local plan and the extent to which policies within it are being achieved.
	Cambridge sub region Housing Market Area	The Cambridge housing sub-region is made up of seven district councils; five in Cambridgeshire and two in Suffolk: <ul style="list-style-type: none"> <li>• Cambridge</li> <li>• East Cambridgeshire</li> <li>• Fenland</li> <li>• Huntingdonshire</li> <li>• South Cambridgeshire</li> <li>• Forest Heath (Suffolk)</li> <li>• St Edmundsbury (Suffolk).</li> </ul> See also SHMA below.
	Core Strategy Policy CS7: Overall housing provision	Part of this policy was quashed as a result of the high court challenge. The whole policy is being reviewed through the Single Issue Review.
	Core Strategy Policy CS9: Affordable housing provision	Policy CS9 sets out the policy requirements for affordable housing in the district in relation to new development.
<b>CWS</b>	County Wildlife Sites	This is a non-statutory designation which recognises the high value of a site for wildlife, with many sites being of county and often regional or national importance. They often support characteristic or threatened species and habitats included in Local and National Biodiversity Action Plans.
<b>DCLG</b>	Department of Communities and Local Government	DCLG is the government department responsible for areas including: building regulations, housing, local government and planning
<b>EEFM</b>	East of England Forecasting Model	The East of England Forecasting Model was developed by Oxford Econometrics to project economic, demographic and housing trends in a consistent fashion. It covers a wide range of variables, and is designed to be flexible so that alternative scenarios can be run. The EEFM was extended in 2011 and now provides forecasts for the East of England, the East Midlands and the South East regions, and seven LEP areas.
<b>HCA</b>	Homes and Community Agency	The HCA is the government's housing, land and regeneration agency, and the regulator of social housing providers in England.

<b>HMA</b>	Housing Market Area	A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap. (PPG definition: Paragraph: 010, Revision date: 06 03 2014). Housing market areas are usually defined using journey to work patterns, migration patterns, and the price of housing, amongst other variables.
<b>IECA</b>	Infrastructure and Environmental Capacity Appraisal	This study considers the environmental capacity of settlements and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath District and St Edmundsbury Borough areas.
	Housing Stock	The total number of dwellings in a settlement
<b>IDP</b>	Infrastructure Delivery Plan	The IDP is a document setting out the infrastructure issues and requirements for the district to facilitate growth within a given plan period.
	Issues and Options	Issues and Options documents are produced during the early stages in the preparation of development plan documents and issued for consultation.
	Key Service Centre	A Key Service Centre is a higher order settlement, as defined in the Forest Heath 2010 Core Strategy. The services and facilities available in key service centres include some if not all of: a convenience shop, public transport, health care, primary school and access to employment opportunities.
<b>LP</b>	Local Plan	A Local Plan is a portfolio of documents which plans for the future development of an area. The Local Plan consists of development plan documents adopted under the Planning and Compulsory Purchase Act 2004. In Forest Heath it consists of the adopted Core Strategy 2010 except for Policy CS7 which is currently the subject of the Single Issue Review – see SIR below) and any saved 1995 Local Plan policies which are still relevant. Once the Single Issue Review and Site Allocations Local Plan have been adopted, these too will form part of the Local Plan.
	Market Town	The highest order of settlement as defined in the Forest Heath Core Strategy. These contain a range of service, facilities and amenities and act as transport hubs.

<b>NPPF</b>	National Planning Policy Framework (2012)	The NPPF consolidates all policy statements, circulars and guidance documents into a single, National Planning Policy Framework. The framework sets out government policies for making local and neighbourhood plans and development management decisions.
<b>NPPG</b> (often referred to as PPG)	National Planning Practice Guidance	The online suite of national planning guidance intended to elucidate on sections of national planning policy set out in the NPPF.
<b>OAN</b>	Objectively Assessed Needs	The housing that households are willing and able to buy or rent, either from their own resources or with assistance from the state (Planning Advisory Service definition, June 2014)
	Preferred Options	Preferred Options documents are produced as part of the preparation of development plan documents and issued for formal public participation. The document shows the preferred 'direction', but not the final version, of a development plan document.
	Primary Village	A lower order settlement that provides basic level services as defined in the Forest Heath 2010 Core Strategy.
<b>RSS</b>	Regional Spatial Strategy	The RSS was a regional planning policy document that set policies for all local authorities within a formally designated region. The RSS for the East of England Region was abolished in January 2013
<b>SAC</b>	Special Area of Conservation	This is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with SPAs they form a network of protected sites across the EU called Natura 2000.
<b>SALP</b>	Site Allocations Local Plan	The SALP allocates sites for homes, jobs and community facilities.
<b>SEA</b>	Strategic Environment Assessment	European Strategic Environment Assessment Directive (2001/42/EC) requires an assessment of certain plans and programmes including those related to planning and land-use. The Sustainability Appraisal includes the SEA.
<b>SHLAA</b>	Strategic Housing Land Availability Assessment	The SHLAA is produced annually to help demonstrate that the district has sufficient sites to meet demand. It is a key part of the evidence base for the Site Allocations document insofar as it considers the availability, suitability and deliverability of all known sites within the district.

<b>SHMA</b>	Strategic Housing Market Assessment	<p>The SHMA provides an objective assessment of the need for all homes, as well as for affordable homes, to inform local plan reviews. The Cambridge Sub-Regional SHMA is a report commissioned by the Cambridge Sub-Regional Housing Board (*CRHB) to inform both future housing strategies and individual housing developments within the sub-region. (See Cambridge housing sub-region Housing Market Area above).</p> <p>*CRHB comprises the seven authorities in the sub region housing market area together with Cambridgeshire County Council, the Homes and Communities Agency (HCA) and three registered social landlord (RSL) representatives.</p>
<b>SIR</b>	Single Issue Review	<p>Forest Heath's Core Strategy (as adopted in 2010) was the subject of a High Court Order in 2011 which essentially quashed the distribution and phasing of housing delivery for Forest Heath as it appeared in Core Strategy Policy CS7 of the document. The Council resolved to revisit all aspects of Core Strategy Policy CS7 (to include a reassessment of overall growth for the district) from the initial Issues and Options stage - a process termed a Single Issue Review.</p>
<b>SPA</b>	Special Protection Area	<p>This is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with the SACs the SPAs form a network of protected sites across the EU called Natura 2000.</p>
<b>SSSI</b>	Sites of Special Scientific Interest	<p>This is a nature conservation designation denoting a protected area in the United Kingdom.</p>
	Windfall sites	<p>Windfall sites are sites which have not been specifically identified as available in the local plan process. They often comprise previously developed sites that have unexpectedly become available for development.</p>

## Appendix A: DCLG 2012-Based Household Projections: Forest Heath



# DCLG 2012-Based Household Projections: Forest Heath

## Cambridgeshire Research Group

**MAY 2015**

### Introduction

1. The latest set of DCLG 2012-based household projections (published in February 2015) indicates a rise in household population of 16,000 and a rise in households of 6,000 in Forest Heath between 2011 and 2031. This set of projections indicates a rise in average household size, which is unique to Forest Heath (with the exception of the Isles of Scilly).

### Recent Trends

2. The DCLG household projections are based on the ONS 2012-based sub-national population projections. The ONS projections are trend based, and project a continuation of trends from the preceding five years. During this period a combination of events in Forest Heath yields an unusually high population growth trend, specifically:

- The United States Air Force (USAF) has been moving its service personnel closer to, and onto, its bases. Part of this has seen housing previously occupied by USAF personnel being returned to the local community. A prime example of this is the Persimmon Homes Estate of some 400 homes, Newmarket, being returned during 2008 ([BBC NEWS | England | Suffolk | Anger over 400 houses left empty](#)).
- Some years of extremely high housing completion rates, notably a peak of 549 housing completions in 2007-08, and 454 completions in 2009-10.
- The factors above have contributed to a higher rate of in-migration from 2009, with a surge in 2009-10.
- The USAF is in the process (beginning in 2013) of handing back Lord's Walk, Lakenheath, to the community (around 550 houses).

3. Looking back over a longer period, for example ten years, would give a much more representative trend for Forest Heath, evening out the impact of these 'unique' developments.

## Household Size

4. The DCLG household projections for Forest Heath yield a trend in household size that is contrary to expectations for all other local authorities (with the exception of the Isles of Scilly). Whilst the trend for England is to see household size reduce consistently across the projection period (from 2.36 in 2012 to 2.21 in 2037), Forest Heath is projected to see its average household size rise from 2.34 in 2012 to 2.39 in 2027, before beginning to fall marginally away to 2.35 by 2037.

5. Between 2007 and 2013 there has been a consistently rising birth rate in Forest Heath. Local data indicates that the USAF vacated homes have been populated by growing households (i.e. including new babies). This impacts the fertility rate for Forest Heath and again is projected forward.

## Longevity of DCLG 2012-Based Household Projections Uncertain

6. The current set of DCLG 2012-based household projections are Stage 1, so are not yet the full set and do not encompass all the data from the 2011 Census. DCLG has stated that it is working on the full set and that they will be published as soon as possible. There is a suggestion that the Stage 2 projections may yield a different outlook.

7. Furthermore, there is evidence that the 2012-based household projections have produced some dramatically different results compared to previous projections for a range of local authorities, raising questions across the board. According to a recent study in Town and Country Planning 2015 “there are 50 local authority areas for which the new projections suggest a household increase that is more than 20% higher than the 2011-based projections and 66 for which the new figure is more than 20% less” (Source: Making sense of the new English household projections by Ludi Simpson and Neil McDonald).

## Conclusion

8. The DCLG 2012-based household projections are based on data from a period when Forest Heath experienced a set of special conditions which are not expected to be continued into the medium to long term future. This set of atypical circumstances has resulted in a projection which gives a significant rise in population against a fall in the growth of households compared to previous estimates, resulting in an increasing average household size. These trends are all at odds with national expectations – with an ageing population, household size is expected to reduce.

9. Although the downsizing of the USAF will impact Forest Heath in the short term, its effect will be diluted by the action that the USAF has already taken in handing back properties to the community. Furthermore, the closure of the USAF's base at Mildenhall will in part be offset by some expansion at Lakenheath ([USAF to pull out of airbases at Mildenhall, Alconbury and Molesworth - BBC News](#)). Taking a longer term trend which encompasses data which pre-dates this set of special circumstances gives a more representative view for Forest Heath. Equally, the Population, Housing and Employment Forecasts Technical Report 2013, which was produced using 2010-based estimates (using data which precedes the full onset of this atypical set of conditions), is more representative of what is considered typical for Forest Heath.



**Appendix B: Affordable housing need in Forest Heath, paper by  
Cambridgeshire Research Group, May 2015**



# Affordable Housing Need in Forest Heath Cambridgeshire Research Group MAY 2015

## Introduction

1. This note assesses the latest evidence to support the need for affordable housing in Forest Heath district since the publication of the Cambridge sub-region Strategic Housing Market Assessment (SHMA) in May 2013.
2. The background information in this note reflects much of the detail that was included in the Hearing Statement on Housing for the Cambridge and South Cambridgeshire Local Plan examinations, produced in October 2014. As such, it reflects a consistent approach to assessing affordable housing need across the Cambridge sub-region Housing Market Area (HMA) based on the most recent comprehensive update. Figures for the 2013 SHMA were largely based on the 2007 Strategic Housing Market Assessment Practice Guidance. The 2013 Housing and Economic Development Needs Assessment (HEDNA) Guidance was released after the publication of the 2013 SHMA.
3. The methodology between these two sets of guidance is generally consistent and this approach was accepted by planning inspectors at East Cambridgeshire and Fenland Local Plan examinations. A comparison of both approaches is outlined elsewhere.

## Changes since publication of the SHMA

4. Since the publication of the 2013 SHMA, there have been two changes in circumstances that affect the calculation of affordable housing need:
  - i. Review of Housing Registers
    - The housing needs register in each district is a significant factor affecting the affordable housing need calculation, and the point and frequency of district reviews of people expressing housing need in their area has an impact on the calculation. The affordable

housing need calculation<sup>3</sup> uses data from 2011/12 which was the most current at the time the SHMA was prepared.

- Nationally changes have been made to the sub-regional Allocations Policy to take into account the Localism Act and new guidance published on the allocation of social housing. These changes support rolling reviews of Housing Register applications, which means all applicants have to re-register.
- The move to more frequent reviews of applications will ensure Home-Link, the choice-based lettings system, is an active register of housing need. These reviews are now being conducted by all seven districts in the HMA, including Forest Heath.

ii. Concealed Households

- The concealed household estimates from the 2011 Census were considerably higher than the 2009 CLG estimates. It is not clear how these figures will be updated in future but the 2011 figures will be used until superseded or another source of the information becomes available.

### Updated calculation of affordable housing need

5. Taking account of these factors, an updated draft calculation of affordable housing need in the HMA as a whole was undertaken in October 2014 as a comparison with the published SHMA. The figures for the HMA are contained in the tables below.

#### Overview document, May 2013

The “Overview of Cambridge sub-region SHMA, May 2013” document sets out in a table on page 7 the affordable housing need, subtracting the projected affordable supply (excluding new build) over a 20 year timescale. Supply is subtracted from overall need to give a net figure, to be met principally by new build homes.

**Table 1: Overview: original published May 2013 using 2011/12 data**

	A	B	A – B
	Affordable housing need (current + newly arising)	Affordable housing supply projected over 20 years EXCLUDING new build	Need minus projected supply
Cambridge	17,131	2,713	14,418
East Cambridgeshire	6,197	2,680	3,517
Fenland	7,927	4,400	3,527
Huntingdonshire to 2031	10,259	3,047	7,212
South Cambridgeshire	11,838	2,827	9,011
<b>Forest Heath</b>	<b>5,935</b>	<b>2,193</b>	<b>3,742</b>
St Edmundsbury	7,650	4,213	3,437

<sup>3</sup> SHMA, Chapter 13, page 16.

**Table 2: Overview: update based on 2012/13 data**

	A	B	A – B
	Affordable housing need (current + newly arising)	Affordable housing supply projected over 20 years EXCLUDING new build	Need minus projected supply
Cambridge	10,896	1,753	9,143
East Cambridgeshire	5,952	2,840	3,112
Fenland	5,851	4,200	1,651
Huntingdonshire to 2031	9,706	4,347	5,359
South Cambridgeshire	9,253	4,193	5,060
<b>Forest Heath</b>	<b>6,115</b>	<b>3,307</b>	<b>2,808</b>
St Edmundsbury	5,890	3,580	2,310

**Table 3: Overview: update based on 2013/14 data (Draft)**

	A	B	A – B
	Affordable housing need (current + newly arising)	Affordable housing supply projected over 20 years EXCLUDING new build	Need minus projected supply
Cambridge	11,809	1,407	10,402
East Cambridgeshire	6,302	3,247	3,055
Fenland	6,721	907	5,814
Huntingdonshire to 2031	10,525	2,947	7,578
South Cambridgeshire	9,893	4,320	5,573
<b>Forest Heath</b>	<b>6,482</b>	<b>1,253</b>	<b>5,229</b>
St Edmundsbury	6,456	2,393	4,063

### Analysis of changes since May 2013

6. In the assessment of affordable housing need, the 2013 guidance seeks to identify the number of homes made available per year from beneficial moves by households in the social rented sector. This element is also included in the 2007 guidance but is worded less clearly. Our current approach based on the 2007 guidance looks at such beneficial moves that would free up social rented homes arising from theoretical moves of overcrowded and under-occupying households moving within the social rented sector.
7. On the supply side of the calculation, we use the number of under-occupying social renters on the register minus the number of overcrowded social tenants on the register. Historically this has always meant a comparatively small negative number of properties available through these means as the number of overcrowded households is generally greater than the number of households who are under-occupying, i.e. in this area because of the type of stock available, this type of swap does not generate an additional supply.
8. In 2013, there was no data available for 2011 and 2012 about this indicator. Figures used in the 2011 and 2012 calculation were therefore extrapolated from the 2010 and 2013 data. Between 2013 and 2014 this negative number increased substantially in most districts of the sub-region (became a higher negative number); this is particularly so for Forest Heath where it increased almost sixfold from -18 to -113. As it appears on the supply side of the affordable need calculation, this negative number therefore appears as a large reduction in supply. Between 2013 and 2014, there was an increase in the number of both under-occupiers and overcrowders. Preliminary analysis for 2015 suggests a small negative number again.
9. An initial thought was that this may be due to the impact of the benefit changes relating to spare rooms in social rented housing (the under-occupation penalty), which was introduced in 2013. However, if this were the case we might expect to see this effect continued in 2015, but it is not, suggesting other factors. We will continue to monitor this trend and investigate alternative sources of data to better capture the impact of beneficial moves on supply, but given the magnitude of the difference for this single year we feel it is more appropriate and gives a more realistic and conservative estimate of overall affordable need to use a zero estimate for 2014 for Forest Heath.

## Revised updated affordable housing need

**Table 4: Detail: affordable housing need in Forest Heath 2010/11 published May 2013 to 2013/14 revised update**

The 2012 Baseline column represents the figures published in the 2013 SHMA.

CLG 2007 Guidance reference		2011	2012 (Baseline)	2013	2014
5.1.1	Homeless households	11	11	10	10
5.1.2	Overcrowded	251	254	382	344
	Concealed	109	109	177	177
5.1.3	HNR Band A	16	30	50	83
	HNR Band B	139	158	174	343
	HNR Band C	746	800	224	339
	HNR Band D	405	460	271	389
	Revised Band D (not including intermediate overlap)	399	455	264	389
	Intermediate Register	57	59	73	19
	Register overlap	6	5	7	0
<b>5.1</b>	<b>Current total housing need</b>	<b>1,717</b>	<b>1,865</b>	<b>1,344</b>	<b>1,694</b>
5.2.1	From existing households - number	199	199	277	277
	In migrant owner occupiers - number	37	37	60	60
	In migrant private tenants - number	24	24	38	38
	In migrant social tenants - number	4	4	6	6
	In migrant other (LCHO) - number	0	0	0	0
5.2.2	From existing households - multiplier	35%	35%	39%	37%
	In migrant owner occupiers - multiplier	0%	0%	0%	0%
	In migrant private tenants - multiplier	8%	8%	15%	0%
	In migrant social tenants - multiplier	100%	100%	100%	100%
	In migrant other (LCHO) - multiplier	100%	100%	100%	100%
	Newly forming households unable to afford	76	76	121	109
5.2.3	Households who enter the register and are	132	128	118	118*

CLG 2007 Guidance reference		2011	2012 (Baseline)	2013	2014
	housed within the year				
<b>5.2</b>	Total newly arising need	207	204	239	226
5.3.1	Affordable dwellings occupied by households in need	-20	-19	-18	0**
5.3.2	Surplus stock (If less than 3% = 0%)	0	0	0	0
5.3.3	Committed supply of new affordable units	196	166	136	112
5.3.4	Units to be taken out of management	0	0	0	0
<b>5.3.5</b>	Total stock available	176	147	118	112
5.3.6	Annual supply of social re-lets	83	93	149	154
5.3.7	Annual supply of intermediate affordable housing available for re-let or re-sale at sub-market levels	28	36	34	22
<b>5.3.8</b>	Total annual supply of affordable housing	112	129	183	176
	Total supply	288	276	301	288
	Not including committed supply	92	110	165	176
	Plan period newly arising need	4,140	4,070	4,771	4,522
	Plan period newly arising need AND current need	5,857	5,935	6,115	6,216
	Plan period supply not including new build	1,833	2,193	3,307	3,513
	Plan period newly arising need AND current need MINUS plan period supply not including new build	4,024	3,742	2,808	2,703

\* Stage 5.2.3 Awaiting update

\*\* Stage 5.3.1 Due to an atypically large negative number for 2014, 0 is the most conservative estimate, as outlined above.

## Conclusions

10. The net affordable housing need for Forest Heath district between 2011 and 2031 in the SHMA published in May 2013 is 3,742 additional homes. However, in common with all authorities across the HMA that figure was updated in October 2014 for more recent years to take account of changes in local housing registers and newly published data on concealed households.
11. A particular issue that has arisen for Forest Heath in this calculation of need for 2014 is the effect of a large negative number relating to the balance of under-occupation and overcrowding in social rented housing. This has a significant and disproportionate effect on calculating the potential housing supply. This number appears to be a statistical anomaly that does not reflect previous trends and does not appear to be repeated from early analysis of the most recent, emerging figures. Consequently, a reasonable decision has been taken to disregard this apparently erroneous figure.
12. The updated affordable housing need is set out in the table below.

**Table 5: Overview: revised update based on 2013/14 data**

	A	B	A – B
	Affordable housing need (current + newly arising)	Affordable housing supply projected over 20 years EXCLUDING new build	Need minus projected supply
Forest Heath	6,216	3,513	2,703

May 2015