



**St Edmundsbury Borough
Monitoring Report:
Housing Delivery 2011/12**

Planning Policy
St Edmundsbury Borough Council

November 2012

1. Introduction and summary

Local planning authorities are required, as part of the preparation of planning policies, to monitor the delivery of policies and proposals. In addition, there has been a long standing requirement to maintain a supply of land for new house building that can be delivered over the imminent five year period. The monitoring information has previously been published in the Local Development Framework Annual Monitoring Report, which the Borough Council has previously published on seven occasions.

The regulations concerning the preparation of Annual Monitoring Reports changed in the Localism Act 2011 and it is no longer necessary to produce a single report covering all subjects by 31 December of the monitoring year. The new "Authorities Monitoring Report" can cover single topics as chosen by local authorities and requires monitoring information to be made available as soon as it is available to the Council.

Furthermore, the National Planning Policy Framework reinforces the need for local planning authorities to identify a "supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market" as well as a supply of broad locations for 6-10 and, where possible, 11-15 years.

This Housing Delivery report specifically measures performance against housing need identified in the St Edmundsbury Core Strategy, adopted in December 2010. In addition, the report provides initial and relevant information from the 2011 Census and an assessment of the projected future housing land supply situation across the borough.

The key headlines arising from the report are:

- Housing completion rates remain well below the long term average and the requirement set out in the adopted Core Strategy;
- The long term distribution of house building is closely in line with that planned in the Core Strategy;
- Allowing for the minimum requirements in the National Planning Policy Framework concerning land supply, it is only possible to demonstrate a 4.9 years supply. This would diminish to 4.3 years if the Council were required to provide a 20% buffer due to "persistent under delivery" in recent years;
- Delivery of affordable homes has also decreased in 2011/2 compared with the previous year;
- Sufficient sites have been identified in existing or emerging local plan documents to deliver the projected housing needs to 2031;
- The 2011 Census population for the borough was 5,000 higher than earlier government projections; and
- The latest government projections for 2021 suggest that the population of St Edmundsbury will be over 3,000 higher than had previously been predicted.

2. Recent Housing Delivery

A key objective of the adopted St Edmundsbury Core Strategy is to ensure that an adequate and continuous supply of land is available to meet the projected housing needs of the borough to 2031. It makes provision for the construction of 15,630 homes across the borough between 2001 and 2031, an average construction rate of 520 a year. The Core Strategy also sets out a policy for the delivery of affordable homes. Prior to the adoption of the Core Strategy, the planning policy framework for housing was contained in the Replacement Local Plan, adopted in 2006, which planned for growth to 2016 based on the former County Structure Plan requirements of 440 homes a year.

However, as the Core Strategy was not adopted until December 2010, it is acknowledged that the higher level of delivery rates contained within it will take a while to catch up given the need to identify sites in local plans and bring forward planning permissions on them.

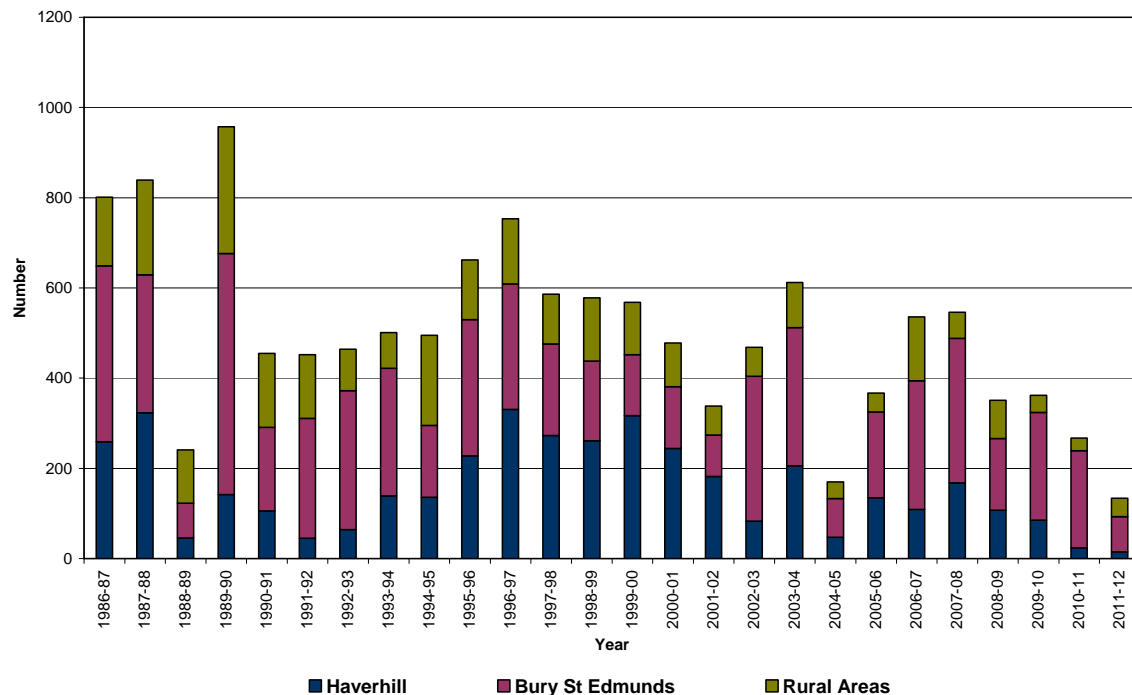
Between 2001 and 2012 4,151 new homes (net) have been built across the borough, representing an average of 377 completions a year. The distribution of these new homes is illustrated in the table below.

Table 1 – Housing Completions 2001 - 2012

	Bury St Edmunds	Haverhill	Rural Area	Total
2001-2002	92	182	64	338
2002-2003	321	83	64	468
2003-2004	306	206	100	612
2004-2005	86	47	37	170
2005-2006	190	135	42	367
2006-2007	285	109	142	536
2007-2008	320	168	58	546
2008-2009	159	107	85	351
2009-2010	239	85	38	362
2010-2011	215	24	28	267
2011-2012	78	15	41	134
Totals:	2291	1161	699	4151
Annual Average	208	105	63	377

The average net annual completion rate has witnessed a significant slowing down since 2008. This decline is clearly due to the downturn in the economy as there remain a large number of sites in the adopted Replacement Local Plan that have yet to be developed. However, looking at the longer term growth rates in the borough, the average annual completion rate since 1986 is 499, during which time there have been a number of peaks and troughs in delivery.

Borough Housing Completions 1986-2012



The Core Strategy indicates the general distribution of new homes to be built between 2001 and 2031. The table below compares the planned distribution to that achieved to date:

Table 2 - Distribution of new homes

	Core Strategy	Achieved 2001-2012
Bury St Edmunds	52%	55%
Haverhill	34%	28%
Rural Area	14%	17%

The Core Strategy makes provision for constructing an average of 520 new homes a year between 2001 and 2031. However, given that until December 2010 the adopted local planning policy made provision for constructing 440 homes a year to 2016, it is not surprising that the total completions are 1,570 below the planned rate. However, the Core Strategy recognised that housing delivery would increase later in the plan period, as strategic sites in Bury St Edmunds and Haverhill started to be

delivered. Paragraph 4.10 of the Core Strategy sets out the following estimated delivery rate:

2008 – 2016 – 481 per annum

2017 – 2021 – 577 per annum

2022 – 2031 – 583 per annum

3. Meeting the Core Strategy Housing Requirements

As noted above, the St Edmundsbury Core Strategy makes provision to deliver 15,630 new homes between 2001 and 2031. With 4,150 completions by 31 March 2012, there remains a residual of 11,480 to complete between 2012 and 2031 as illustrated in Table 3. Clearly, as noted above, the significant downturn in house building since 2008 has had an impact on delivery, although the population and resultant need continues to grow.

The Core Strategy overall provision equates to 520 additional homes a year. However, as a result of the house building downturn, the rate will have to increase to 604 a year if the planned homes are to be delivered by 2031. The Borough Council continues to progress the preparation of the Vision 2031 documents in which new site allocations are being identified as well as more detailed plans for the Core Strategy strategic sites around Bury St Edmunds and Haverhill.

Table 3 – Housing Requirement

Core Strategy Housing Requirement 2001-2031 (Policy CS1)	15630
Completed 2001 – 2012	4150
Residual requirement 2012-2031	11480
Divided by remaining years of the Core Strategy (19 yrs)	604 per annum

NB – Figures are rounded

As at 31 March 2012 sites across the borough that had been identified but not completed would deliver 11,026 new homes. This is broken down as follows:

Table 4 – Housing Commitments

Large sites with planning consent but not developed	668
Small sites with planning consent but not developed	331
Sites allocated in adopted Replacement Local Plan but not developed	1560
Strategic sites in Core Strategy	6850
Other known potential *	489
Additional sites identified in a Preferred Options draft Local Plan	1,128
Total	11,026

* Other known potential relates to sites which are not necessarily identified in an adopted local plan but where sites have adopted development briefs or where there is a resolution to approve an application.

Table 4 includes additional sites have been identified in the Preferred Options Draft Vision 2031 local plan documents for Bury St Edmunds, Haverhill and for the Rural Area.

4. Windfall

Windfall housing development (ie sites not previously identified in a local plan) has always made an important contribution across St Edmundsbury. In presenting the Core Strategy for examination in 2010 the Borough Council drew the attention of the Inspector to the fact that there was a record over time of the delivery of housing through small site¹ windfall permissions despite the then PPS3 Housing not allowing an allowance to be made for the first ten years of a local plan. This was especially the case in the rural area where there are 44 villages with housing settlement boundaries where there is a presumption in favour of infill housing development within the boundaries. As a consequence the Borough Council suggested that a Core Strategy provision of 25 homes a year on small windfall sites in the rural area would be a conservative approach to accounting for this type of development.

The Planning Inspector examining the Core Strategy accepted this fact and agreed an allowance for 25 additional homes a year on small windfall sites in the rural area after the initial five years of the Plan. This amounted to a total of 325 by 2031.

However, government policy, in the form of the National Planning Policy Framework, now recognises the significant contribution that windfall housing can make and, in paragraph 48, allows local planning authorities to make provision for windfall in assessing future housing delivery throughout the life of a plan.

Furthermore, recent Borough Council research indicates that, on average 180 permissions are granted annually on small windfall sites across the borough, including Bury St Edmunds and Haverhill. While it is acknowledged that not all such permissions are implemented, it is considered that, based on the empirical evidence, an allowance of 135 homes per annum (75% of the average) would be a conservative and realistic approach to making an allowance for windfall developments. This would allow for non-implementation and the potential for numbers to reduce over time as opportunities become more limited. As a result, this could deliver an additional 2,565 homes across St Edmundsbury by 2031.

5. Five year land supply

The NPPF requires local planning authorities to identify a five years supply of sites that are available, suitable and achievable. Paragraph 47 states that local planning authorities should “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of

¹ Small sites are sites capable of delivering less than 10 dwellings

5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land"

A footnote in the NPPF states: "To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."

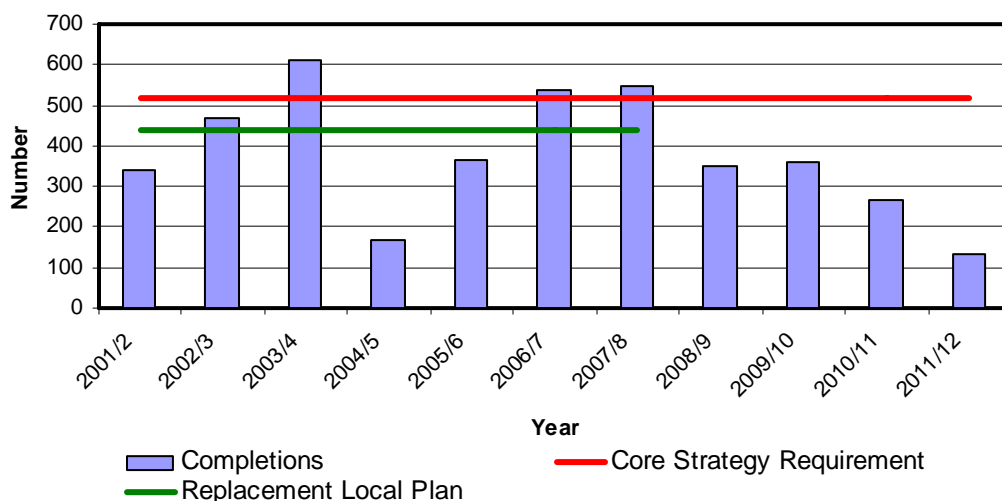
The five year need is calculated by subtracting the homes built so far from the total planned provision and dividing that figure by the years remaining in the plan, as illustrated below:

Table 5 - Residual housing requirement

a)	Requirement 2001 - 2031	15,630
b)	Completions 2001 - 2012	4,150
c)	Residual requirement 2012 – 2031 a-c	11,480
d)	Residual annual requirement c/19	604
e)	Five year requirement based on residual need (dx5)	3,020

In terms of the content of paragraph 47 of the NPPF, it is necessary to give some consideration to the scale of the buffer that needs to be added to the five year requirement. This requires an interpretation of "persistent under delivery". Given the current economic climate and housing market, persistent under delivery is almost inevitable. However, the situation in St Edmundsbury is clouded by the fact that the Core Strategy was not adopted until December 2010 and that, prior to that date, the local plan was based on delivering lower housing numbers.

The graph below illustrates that housing delivery has been below the Core Strategy requirement since its adoption although prior to the economic downturn the delivery rates were consistent with the strategy. Given the lack of detailed allocations, other than in the outstanding Replacement Local Plan, this lower rate is totally reasonable, especially given the slow down in the house building market. However, it is probably appropriate to demonstrate the five year land supply situation based on a 5% and 20% buffer. Applying a 5% buffer would result in a requirement for 3,160 new homes and a 20% buffer would require 3,610 homes by 2017.



The Borough Council has taken a pragmatic approach to assessing the potential of known sites to deliver housing in five year bands over the period to 2027 and the years beyond up-to 2031. The identified sites are set out in **Appendix A**, which also provides an estimate of delivery based on the planning status of the site and potential viability issues that might delay bringing the site forward.

Based on the information in Appendix A, the following tables indicate the likely housing delivery for the first five years, years five to ten and years 10 to 15.

	2012-2017	2017-2022	2022-2027
Delivery estimate	3118	3454	4197

Year is based on 1 April to 31 March

Five year calculation with no buffer

Assessment of deliverable sites 2012/17 3118

Deliverable sites / 604 = 5.16 years

5% buffer allowance

Need = 3170

$3170 / 5 = 634$ per annum

$3118 / 634 = 4.9$ years

20% buffer allowance

Need = 3624

$3624 / 5 = 725$ per annum

$3118 / 725 = 4.3$ years

6. Affordable Housing

The delivery of additional affordable housing is a top priority for the Council, given the relative difficulty that many people have in purchasing homes in the borough. Policy CS5 of the Core Strategy seeks to ensure that the mix, size, type and tenure of affordable homes meet the local need. Affordable housing is housing that meets the needs of specified eligible households whose needs are not met by the market. It can include social rented housing and intermediate housing.

Table 6 – Affordable Housing – commencements - 1 April 2011 – 31 March 2012

Sites	Settlement	Housing Association	Dwelling numbers (gross)	Dwelling numbers (net)
Plots 1 - 8, Spring Lane	Bardwell	Hastoe Housing Association Ltd	8	8
Jubilee House, 192A & 192B Ashwell Road	* Bury St Edmunds	Havebury Housing Partnership	2	2
Abbots Gate, (plots 17A, 18A & 25A)	Bury St Edmunds	Suffolk Housing Society	3	3
The Maltings, Mildenhall Road, (35 plots)	Bury St Edmunds	Havebury Housing Partnership	35	35
Orchard Close, Nether Road	Cavendish	Havebury Housing Partnership	8	8
Totals			56	56

* Sheltered Housing

Table 7 - Affordable Housing - completions - 1 April 2011 – 31 March 2012

Sites	Settlement	Housing Association	Dwelling numbers (gross)	Dwelling numbers (net)
Plots 1 - 8, Spring Lane	Bardwell	Hastoe Housing Association Ltd	8	8
1, St Edmunds Place	* Bury St Edmunds	Havebury Housing Partnership	2	1
1, Chestnut Close, Prince Charles Avenue	* Bury St Edmunds	Havebury Housing Partnership	2	1
Jubilee House, 192A & 192B Ashwell Road	Bury St Edmunds	Havebury Housing Partnership	2	2
Abbots Gate, (plots 17A, 18A & 25A)	Bury St Edmunds	Suffolk Housing Society	3	3
Orchard Close, Nether Road	Cavendish	Havebury Housing Partnership	8	8
Totals			25	23

* Sheltered Housing

Table 8 – Affordable Housing completions and distribution comparison

	Gross Completions		Net Completions	
	2010-2011	2011-2012	2010-2011	2011-2012
Bury St Edmunds	156	17	35	15
Haverhill	33	0	26	0
Rural	22	8	6	8
St Edmundsbury	211	25	67	23

Source: St Edmundsbury Borough Council

Table 9 – Affordable Housing consents and distribution comparison

	Gross Permissions		Net Permissions	
	2010-2011	2011-2012	2010-2011	2011-2012
Bury St Edmunds	41	22	39	22
Haverhill	4	28	4	24
Rural	16	0	16	0
St Edmundsbury	61	50	59	46

Source: St Edmundsbury Borough Council

Table 10 - Affordable Housing – planning permissions - 1 April 2011 – 31 March 2012

Sites	Settlement	Housing Association	Dwelling numbers (gross)	Dwelling numbers (net)
Land at Vinefields, (plots 38 – 43, 48 – 63)	Bury St Edmunds	Orbit East	22	22
Land at Greenwood and Hazel Close, (plots 1 -13)	Haverhill	Havebury Housing Partnership	13	9
Research Park, Hanchett End, (15 plots)	Haverhill	Not known	15	15
Totals			50	46

Source: St Edmundsbury Borough Council

7. Dwelling size and type

Adopted planning policies seek a mix of house types to be constructed across the borough to ensure that local needs are met. The tables below indicate the number of homes granted planning consent and completed in 2011/12 by number of bedrooms per house.

Table 11 – Dwelling size by 2011/12 permissions

Gross figures	Planning permissions: Number of bedrooms						
	1	2	3	4	5	6	7+
Bury St Edmunds	13	32	45	17	1	0	0
Haverhill	4	14	8	6	0	0	0
Rural	2	12	8	16	3	1	0
St Edmundsbury	19 10.4%	58 31.9%	61 33.5%	39 21.4%	4 2.2%	1 0.6%	0 0

Does not include outline planning permission at Research Park, Hanchet End, Haverhill (150 units)

Source: St Edmundsbury Borough Council

Table 12 – Dwelling size by 2011/12 completions

Gross figures	Dwellings completed: Number of bedrooms						
	1	2	3	4	5	6	7+
Bury St Edmunds	7	14	44	17	4	0	0
Haverhill	2	3	1	9	0	0	0
Rural	3	21	10	8	3	1	0
St Edmundsbury	12 8.2%	38 25.8%	55 37.4%	34 23.2%	7 4.8%	1 0.6%	0 0

Source: St Edmundsbury Borough Council

Table 13 – Dwelling type by 2011/12 permissions

Gross figures	Planning permissions: Type of dwelling		
	Detached	Semi-detached	Terrace
Bury St Edmunds	14	15	79
Haverhill	1	18	13
Rural	33	9	0
St Edmundsbury	48 26.4%	42 23.1%	92 50.5%

Does not include outline planning permission at Research Park, Hanchet End, Haverhill (150 units)

Source: St Edmundsbury Borough Council

Table 14 – Dwelling type by 2011/12 completions

Gross figures	Dwellings completed: Type of dwelling		
	Detached	Semi-detached	Terrace
Bury St Edmunds	16	12	58
Haverhill	1	0	14
Rural	22	6	18
St Edmundsbury	39 26.6%	18 12.2%	90 61.2%

Source: St Edmundsbury Borough Council

Table 15 – Dwelling storeys by 2011/12 permissions

Gross figures	Planning permissions: Number of storeys			
	Single storey	Two storey	Three storey	Four storey
Bury St Edmunds	2	43	59	4
Haverhill	2	27	3	0
Rural	7	35	0	0
St Edmundsbury	11 6.0%	105 57.7%	62 34.1%	4 2.2%

Source: St Edmundsbury Borough Council

Table 16 – Dwelling storeys by 2011/12 completions

Gross figures	Dwellings completed: Number of storeys			
	Single storey	Two storey	Three storey	Four storey
Bury St Edmunds	0	60	21	5
Haverhill	0	4	11	0
Rural	8	37	1	0
St Edmundsbury	8 5.4%	101 68.7%	33 22.4%	5 3.5%

Source: St Edmundsbury Borough Council

Table 17 – Density of development

Gross figures	Completed dwellings per hectare	
	2010-2011	2011-2012
Bury St Edmunds	55.35	56.47
Haverhill	79.99	42.88
Rural	22.28	36.76
St Edmundsbury	54.38	48.92

Source: St Edmundsbury Borough Council

The table above indicates the average number of new dwellings completed per hectare of net developable land - the area of a new development site minus any open space.

This data demonstrates the variation in density of new housing between the different areas of the borough. Whilst the national minimum target of 30 dwellings per hectare no longer exists, this does show that old targets are generally being exceeded as existing planning consents get built. The variation exists due to the difference in character between the three areas. In the rural areas, a larger proportion of new dwellings were on single dwelling plots.

8. Statistical indicators

The initial results of the 2011 Census were published during 2012. The usually resident population of the borough in 2011 was 111,008, an increase of 12,815 (13%) since the 2001 Census. The actual population in 2011 is some 5,000 above that projected by the government in 2008. At that time it was projected that the population in 2021 would be 113,600 and in 2031 would be 121,700. Interim population projections published by the Office for National Statistics in September 2012 now suggest that by 2021 the borough population will be 116,850 although no longer term projections have yet been made.

Almost 19% of the borough's population is aged 65 or over. This compares with the other Suffolk districts as follows:

	Population over 65
Babergh	21.4%
Forest Heath	16.2%
Ipswich	14.9%
Mid Suffolk	20.1%
St Edmundsbury	18.9%
Suffolk Coastal	23.2%
Waveney	23.9%

There had been an 11.7% increase in the number of households in the borough since 2001.

Further Census data will become available during 2012/13 and will be reported in further editions of monitoring reports.

Appendix A

[illegible]

[illegible][illegible]

NEW ALLOCATIONS IN THE BURY VISION 2031 PREFERRED OPTIONS DOCUMENT

[illegible]

SUB-TOTAL	176	135	0	39	29	0	0	12	0	0	0	0	52	0	0	0	0	0	0	0	0
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NEW ALLOCATIONS IN THE HAVERHILL VISION 2031 PREFERRED OPTIONS DOCUMENT

[illegible]

Policy	Site	Capacity	Remaining	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
HAV 17	Castle Manor & College	60	60									30	30									
SUB-TOTAL		288	287	0	11	0	65	90	61	0	0	30	30	0	0	0	0	0	0	0	0	0
NEW ALLOCATIONS IN THE RURAL VISION 2031 PREFERRED OPTIONS DOCUMENT																						
RV 6b	Land east of Barrow Hill, Barrow	75	75											25	50							
RV 6c	Land west of Barrow Hill, Barrow	75	75											20	20	35						
RV 7b	Land to rear of Nethergate Street, Clare	75	75													25	25	25				
RV 7c	Land off Cavendish Road, Clare	64	64															20	44			
RV 8c	Land west of A143 / south of A1088, Ixworth	80	80												20	50	10					
RV 9a	Stourmead Close, Kedington	65	65		30	35																
RV 9b	Land adj The Limes, Kedington	40	40															40				
RV 11a	Land at Hopton Road, Barningham	20	20		20																	
RV 12a	Land at end of Nether Road, Cavendish	10	10				10															
RV 13a	Land at Queens Lane, Chedburgh	10	10																10			
RV 14a	School Road, Great Barton	20	20				20															
RV 14b	School Road, Great Barton	20	20										20									
RV 15a	Land off Tutelina Rise, Whelnetham	10	10					10														
RV 16a	Land east of Bury Road, Hopton	25	25										25									
RV 17a	Land at The Gables, Ingham	22	22			22																
RV 18a	Land adj to the cricket pitch, Risby	20	20			20																
RV 19a	Land south of Kingshall Street, Rougham	12	12				12															
RV 20a	Land at Nunnery Green/Cemetery Hill, Wickhambrook	22	22				22															
SUB-TOTAL		665	665	0	50	77	64	10	0	0	0	0	45	45	70	80	75	35	60	54	0	0

Policy	Site	Capacity	Remaining	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
LDF Strategic Sites																						
BSE	Fornham (North-west)	900	900				50	100	100	100	100	100	100	100	150							
BSE	Westley (West)	450	450						100	100	150	100										
BSE	Moreton Hall	500	500				50	100	100	100	100	50										
BSE	Compiegne Way (North-east)	1250	1250									100	100	100	100	100	150	150	150	100	100	100
BSE	Rougham Road (South-east)	1250	1250										100	100	100	170	150	150	150	100	100	130
HAV	North-east Haverhill	2500	2500										150	250	250	250	220	250	250	300	300	280
SUB-TOTAL				0	0	0	100	200	300	300	350	350	450	550	600	520	520	550	550	500	500	510
LDF TOTAL				0	100	106	249	340	379	300	350	380	525	627	650	565	595	585	610	554	500	510
OTHER POTENTIAL CAPACITY																						
BSE	Maynewater Lane	14	14		14																	
HAV	North-west Haverhill (phase 2)	395	395											95	100	100	100					
HAV	Gurteens	80	80		40	40																
	WINDFALL ALLOWANCE			135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135
SUB-TOTAL				135	189	175	135	135	135	135	135	135	135	230	235	235	235	135	135	135	135	135
TOTAL				389	643	743	697	646	684	685	710	615	760	907	905	835	830	720	745	689	635	699