

Forest Heath District Council
Assessment of a five year supply of housing land taking a baseline date of 31 March 2015

The five years covered in this assessment are 1 April 2016 to 31 March 2021

1. Introduction

- 1.1 National Planning Policy Framework (March 2012) requires Planning Authorities to identify and maintain a 5 year land supply of deliverable land for housing. The assessment of land supply will be updated annually. If any significant land supply changes occur during this time, further updates will be prepared and made available on the website.
- 1.2 This report sets out the availability of housing land supply for the period 2016-2021. It takes a baseline of 31 March 2015 and estimates completions and new commitments arising for the year 2015-16, establishing a 'year forward' 5 year supply for the period 2016-2021. For land to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable within 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. The NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF, para12).

Approach

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

- 1.7 NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites. The SHLAA provides evidence of sites and broad locations that are sustainable (referenced included) and unsustainable (referenced deferred).
- 1.8 For sites to be considered deliverable, National Planning Policy Framework states they should be:
 - **Available** the site is available now.
 - **Suitable and Achievable** the location for development now is suitable and can be achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable.
- 1.9 Potential sites include those allocated for housing within the local plan, those with planning permission, and any known specific unallocated sites with potential to make a contribution to housing delivery during the 5 year period.
- 1.10 On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the National Planning Practice Guidance (NPPG). It states under section on Housing and Economic Land Availability Assessment paragraph 29;

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

1.11 Paragraph 31 of the NPPG states;

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

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

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan

makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust fiveyear housing supply'.

Calculating the Housing Need

- 1.12 Forest Heath District Council is producing a Single Issue Review (Core Strategy policy CS7) of its housing figures to establish new housing growth targets. For the period 2001 to 2011 the adopted Core Strategy sets the requirement of 3,200 dwellings (320 per annum).
- 1.13 The Cambridge Sub-Region's Strategic Housing Market Assessment update (SHMA), published June 2013 took a base date of 2011 and made a fresh assessment of housing needs in the district. The SMHA assessed the full, objectively-assessed housing need in Forest Heath between 2011 and 2031 at 7,000 dwellings. Using 2011 census data instead of household formations as the starting point for an assessment of future housing demand meant that there was no additional backlog of demand for housing above and beyond the dwellings figures (SHMA, Technical Report para 7.1.6).
- 1.14 Combining the Core Strategy requirement for 2001 to 2011 with the SHMA from 2011 to 2031 gives an overall requirement of 10,200 dwellings for the period 2001 to 2031 (3,200 dwellings for period 2001 to 2011 and 7,000 dwellings for the period 2011 to 2031). However, the SHMA update takes a fresh assessment of the housing need at the base of 2011 therefore based on more up-to-date evidence than that which informed the Core Strategy. Moving forward, it is therefore not necessary for housing supply to make any allowance for past under-delivery prior to 2011. This report therefore assesses the position from the base date of 2011.
- 1.15 The Strategic Housing Market Assessment (SHMA) for Forest Heath was updated in January 2016, setting a need of 6800 dwellings in the period 2011 to 2031. The study was supported by evidence prepared by Peter Brett Associates which assessed market signals. This objectively assessed need (OAN) forms the basis for a five year supply calculation.

Forest Heath Five Year Housing Requirement

a.	SHMA (published 2016) 2011-2031 6,800	6,800
	(340pa)	
b.	Actual net dwelling completions 2011 - 2015	1,123
c.	Residual requirement 2015 – 2031 (a-b)	5,677
d.	Annual requirement (a/20)	340
e.	5 year requirement (d x 5)	1,700
5 ye	ear requirement including 5% buffer (e + 5%)	1,785

2. Five Year Housing Supply

- 2.1 As at 31 March 2015 a total of 1,123 dwellings have been completed since 2011. In order to meet the 6,800 dwelling requirement an additional 5,677 will need to be built in the 16 years from April 2015 to March 2031 (financial calendar period).
- 2.2 This assessment of supply includes sites completed and those with planning permission at 31 March 2015. In addition an estimate is made of likely completions and windfall in the current year 2015/16. A housing trajectory is included which illustrates which sites will contribute to the current year supply and the following five year supply.
- 2.3 Sites proposed as preferred options in the 3rd Issues and Options draft Site Allocation Local Plan (SALP) have been included where they are considered available, suitable, achievable and capable of being delivered within a five-year timeframe, see housing trajectory at Appendix A. These comprise sites identified in the SHLAA, some of which obtained planning permission after 31 March 2015 or a resolution to approve consent. Others are currently subject of a planning application or pre-application discussions have taken place. A pragmatic view has been taken on likely delivery timescale reflecting the status of the planning application, planning conditions and s106 agreements to address infrastructure constraints.
- 2.4 The NPPF gives clear guidance that 'Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years', (footnote 11, page 12). For Forest Heath's 5 year supply report all sites with planning permission have been included within the first five years supply. Thereafter the housing trajectory takes a reasonable windfall allowance of 20 units per annum. This windfall allowance reflects a realistic assumption of sites likely to come forward, allowing for some to lapse.
- 2.5 The remaining Local Plan (1995) allocations without planning permission have been excluded due to uncertainty with deliverability.
- 2.6 In calculating the 5 year supply the NPPG at paragraph 035 states 'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible'. However as the SHMA (2016) sets out a fresh assessment of current housing need, based on more up-to-date evidence than that which informed the Core Strategy, it is therefore not considered necessary for the housing supply to make any allowance for past under-delivery before 2011. This approach is consistent with that used in St Edmundsbury which the Inspector into the examination of the Vision 2031 Local Plan considered appropriate. The Forest Heath's emerging Site Allocations Local Plan plans to meet the full objectively assessed housing need in the district to 2031.
- 2.7 It is relevant to note that there has been a good record of housing delivery over the 6 years to 2011 assessed against the Core Strategy

requirement, where total completions over this period (2,280) have exceeded the requirement of 2,100 (350 pa x 6 years = 2,100).

Five Year Deliverable Housing Supply

Identified Sites	As at April 2016
Outstanding Unimplemented planning permissions	350
(large)*	
minus those expected to be delivered in 2015-16	
Outstanding Unimplemented planning permissions	120
(small)**	
minus those expected to be delivered in 2015-16	
Remaining allocations in Local Plan	0
Other sites (including preferred options SALP sites, some	1,977
of which have obtained planning consent or a resolution	
to approve) where there is evidence of deliverability in a	
5 year period, new planning permissions arising since	
April 2015 and a windfall allowance of 20dw. As	
demonstrated by the housing trajectory Appended A.	
Total supply	2,447

^{*} Larger sites = 10 or more homes

^{**} Small sites = under 10 homes

Five year deliverable housing supply	April 2016 – March 2021				
Annual Average requirement	340				
including 5% buffer	357				
5 Year Identified Supply	2,447				
Five year supply					
Equates to 2447/357 including 5% buffer	6.9 year supply				
Five year supply addressing unmet supply since 2011 (Sedgefield approach)					
Shortfall units 2011-2015	239				
Equates to 2,447 minus 239 = 2,208/357 including 5% buffer	6.2 year supply				

- 2.8 There is a 6.9 year supply of housing land including a 5% buffer. This methodology is consistent with that used by St Edmundsbury Borough Council, an approach considered appropriate by the Inspector following the examination of the Vision 2031 Local Plan. A 20% buffer is not considered appropriate as there has been a good record of provision in the past 10 years. The inspectors report into the Meddlar Stud appeal (Appeal Ref: APP/H3510/A/13/2197077) stated that he was not persuaded that 'there has been a persistent under delivery of housing and so a 20% buffer is not justified'.
- 2.9 An alternative methodology which the NPPF states council's should aim to use where possible, deals with under supply within the first 5 years of the plan period. In addressing the undersupply of 239 units since 2011, the housing land supply will fall to 6.2 years including a 5% buffer. The

undersupply is calculated from the base date of 2011 as the SHMA update (2016) sets out a fresh assessment of current housing need, based on more up-to-date evidence than that which informed the Core Strategy. It is therefore not considered necessary for the housing supply to make any allowance for past under-delivery prior to 2011. The Forest Heath's emerging Site Allocations Local Plan will plan to meet the full objectively assessed housing need in the district to 2031.

2.10 The Hatchfield Farm site is included as a preferred option site (ref N1c) in the Site Allocations Local Plan 3rd Issues and Options, so is included within the 5 year supply calculation. The decision on the call in inquiry is still awaited, however should the recommendation to approve the application be dismissed the council could demonstrate a corresponding 5.9 or 5.2 year supply using methodologies cited above.

3. Monitoring and maintaining the Five Year Supply

- 3.1 The council will monitor the five year supply of deliverable sites on an annual basis linked to the Monitoring Report. The assessment of land supply will be updated annually. If any significant land supply changes occur during this time further updates will be prepared and made available on the website.
- 3.2 Forest Heath has a 6.9 year supply of housing land, including a 5% buffer and 6.2 years when addressing the under supply in the first five years (Sedgefield approach). This assessment is based on monitoring data at 31 March 2015, estimates completions and planning permissions arising in the current year (2015-16) and looks forward one year to give a 5 year supply for the period 2016-2021.

Appendix A

current

Reference		Settlement	Site	Capacity Re	-	ear 2015/16	2016/17 20	017/18 20	18/19 201	.9/20 2020/	21 202	21/22 2	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	3 2028/29	2029/30	2030/31
Large sites with																					
E/02		Exning	Land off Burwell Road	120	120			40	40	40											
		Exning	Windmill Hill	13	7	5	5 2														
		Kentford	Kennet Park	16	16	6															
		Kentford	Former Friskies Pet Care, Moulton Road	92	21	21															
K/11		Kentford	Animal Health Trust, Lanwade Park	41	41	20															
1 /20		Lakenheath	Hall Drive, Lakenheath Hall	11	11	7	-														
L/29		Lakenheath	Matthews Nursery, High Street	13	13		13		40	20	20										
M/29		Mildenhall	Land south Worlington Road and adjacent to former diary site	78 25	78 25	25	-		18	30	30										
		Newmarket Newmarket	Waterwitch House, 46 Exeter Road, Newmarket Jim Joel Court, Howard de Walden Way	25	25	25)	21													
		Newmarket	Fordham Road, Former maltings	59	44	22	2 22	21													
		Red Lodge	Phase 1d	24	3	3															
		Red Lodge	Phase 4b	54	2	2															
		Red Lodge	Phase 5c	71	5	5															
		Red Lodge	Phase 4a	70	41	41															
		Red Lodge	Elms Road, Turnpike Road	295	66	33															
WR/06		West Row	Land north of Mildenhall Road	26	26		26														
•																					
			large sites consent		540	190	131	61	58	70	30										
			small sites consent		270	150	80	20	10	10	0										
			new pp arising so far since 1st April 2015		99		50	20	10	10	9										
			sub total		909	340	261	101	78	90	39										
SALP preferred o	ption - Feb	2016																			
old ref	SALP ref	Settlement	Site																		
BR/01	BR1a	Beck Row	Lamble Close	60	60			25	25	10											
BR/03	BR1b	Beck Row	adj Smoke House Inn, Skeltons Drove	166	166			40	40	40	46										
BR/10	BR1c	Beck Row	adj and south Caravan park on Aspal Lane	117	117		10	30	30	30	17										
BR/26	BR1d	Beck Row	Land east of Aspal Lane	5	5			5													
BR/27	BR1e	Beck Row	Land adj to Beck Lodge Farm	24	24			24													
- 1																					
B/01	B1a	Brandon	Land off Fengate Drove	38	38		20	18													
B/29	B1b	Brandon	Land at Warren Close	20	20						20										
B/31	B1c	Brandon	Land off Gas House Lane	10	10						10										
E/12	E1a	Exning	Land south of Burwell Rd & west of Queens View	140	140							35	35	3	5 3	5					
V/40	144			60	60		20	25	4.5												
K/10 K/16	K1a K1b	Kentford	Land west of Herringswell Road Land to rear of Cock PH	60 34	60 34		20 4	25 20	15 10												
K/10	KID	Kentford	Land to rear of Cock PH	34	34		4	20	10												
L/12	L2d	Lakenheath	Land north of Burrow Drive and Briscoe Way	107	107											3	30 3	30	30 :	17	
, L/13	L2a	Lakenheath	Rabbithill Covert, Station Road	81	81				30	26	25										
L/26	L1b	Lakenheath	Land west of Eriswell Road	140	140			32	30	30	26	22									
L/35	L2c	Lakenheath	Land off Briscoe Way	67	67					30	37										
L/36	L2b	Lakenheath	North Lakenheath	375	375				60	60	60	60	60	6	0 1	5					
L/39	L2d	Lakenheath	Land north of Drift Road	58	58					30	28										
M/19 and M/21	M1a	Mildenhall	Land west of Mildenhall	1250	1250										10	0 15	50 20	00 20	00 20	00 20	200
M/28	M2a	Mildenhall	Land at 54 Kingsway	20	20					10	10										
M/46	M2b	Mildenhall	District Council offices, College Heath Road	89	89						30	30	29								
N /00	NIA	No.	Data Cald Canad	2=	<u></u>													20	20	27	
N/09	N1a	Newmarket	Brickfield Stud	87	87												3	30	30 2	27	
N/11	N1b	Newmarket	Land at Black Bear Lane and Rowley Drive junction	400	400			er.	O.F.	00	90	70									
N/14 N/20	N1c	Newmarket	Hatchfield Farm Crassland off Leaders Way and Soften Way	400	400			85	85	80	80	70									
N/20 N/32	N1d	Newmarket	Grassland off Leaders Way and Sefton Way Former St Felix Middle School site	44 50	44 50					22 25	22 25										
N/33	N1e N1f	Newmarket Newmarket	Land at Philips Close	50 73	73					23	23		25	2	5 2	3					
.,,55				,3	, 5								23	2	- 2						
RL/03	RL1a	Red Lodge	Land off Turnpike Road Phase 2	125	125											3	35 3	30	30	30	
RL/06	RL1b & c	Red Lodge	Land adj twins belt, land east of Red Lodge	471	471				85	85	60	60	60	6							
RL/15	RL2a	Red Lodge	Land north and east of Red Lodge	250	250							50	50	5	0 5	0 5	60				
RL/20	RL2a	Red Lodge	Land north of Elderberry Road	40	40					20	20										
RL/21	RL2a	Red Lodge	Land north of Bilberry Close	10	10						10										
\\/D /O7	WR1a	Most Borr	Land west of Booches Board	140	1.40				26	20	20	20	30	4	4						
WR/07	AALVIA	West Row	Land west of Beeches Road	140	140				20	20	20	30	30	1	4						
			sub total		4551	(54	304	436	518	546	357	289	24						74 20	
			windfall		220						20	20	20	2	0 2	0 2	20 2	20 :	20 2	20 2) 20
			already built 2011-2015		1123																
			pp's		909																
			total		6803																