

West Suffolk

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

FINAL REPORT

Published April 2016

Forest Heath & St Edmundsbury councils



West Suffolk
working together

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Introduction and purpose of the SHLAA

- 1.1 To boost significantly their supply of housing, the National Planning Policy Framework (NPPF para.47) tells local planning authorities (LPAs) that they should:

"Use their evidence base to ensure that their Local Plan (LP) meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework. . . "

Further, the NPPF (para. 159) tells LPAs that they should:

"Prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period."

- 1.2 The online (national) Planning Practice Guidance (PPG) that accompanies the NPPF identifies what a SHLAA should achieve. According to the guidance, they should:

- identify sites and broad location with the potential for development;
- assess their development potential;
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

- 1.3 The West Suffolk SHLAA seeks to identify suitable sites for residential development across the study area (Forest Heath District and St Edmundsbury Borough). The results of the SHLAA will inform Local Plan preparation and monitoring across both authorities. The progress the authorities are making with their respective emerging and adopted local plans is available to view within the context of the Local Development Scheme (LDS) accessible via the West Suffolk web pages:

www.westsuffolk.gov.uk/supportinginformation

2. Background to the West Suffolk SHLAA

- 2.1 As Forest Heath and St Edmundsbury are operating within the same strategic housing market area (the Cambridge sub-region) and are sharing services (including planning) it was considered appropriate, moving forward, to adopt a common approach to the SHLAA methodology and the assessment process itself. This version of the SHLAA document reports separately on the two local authority areas but is published as a single report. The only previous joint SHLAA review report was published in August 2015.

3. Consultation on the draft SHLAA report

- 3.1 Publication of this final version of the 2016 SHLAA follows a period of consultation on a draft SHLAA document published in February 2016. The consultation itself ran from the 24th February until the 15th March. The consultation draft detailed the outcomes of the desk-top appraisal of existing and new sites recently undertaken by council officers and in accordance with the methodology (that is also available to view via the West Suffolk web pages). The authorities sought the views of a wide range of stakeholders on all aspects of the consultation draft SHLAA and in particular:
- **suitability, availability** and **achievability** of the individual sites across both authority areas.
 - **constraints** – Confirmation that the identified constraints (i.e. reasons for deferral) were still appropriate/relevant.
 - **additional sites** – officers welcomed the receipt of any new site details/submissions at this time for assessment and potential inclusion within this final version of the SHLAA review report.
- 3.2 All representations made on the draft document (including new site submissions) were appraised by officers and have informed the preparation of this final 2016 version of the report (see appendix 8).

Part A - Forest Heath District Council

This section of the report contains:

- an assessment of the 18 new sites brought to the attention of the council or identified by officers subsequent to the publication of the previous SHLAA review report (published August 2015);
- a comprehensive review of the potential housing sites identified within the previous SHLAA (both included and deferred) supplemented with any new information including, where appropriate, a revised assessment of suitability, availability and achievability - including viability considerations);
- an update on the housing market in more general terms and consideration of any other matters affecting housing delivery in the district as identified by council officers.

Table 1: The 18 new sites (highlighted rows relate to SHLAA Call for sites submissions or sites that have been identified by officers post consultation)

Settlement	Site Reference	Location	2016 SHLAA Status
Brandon	B/29	Warren Close, Brandon	Included
Brandon	B/30	Land at North Court	Deferred – policy (unsustainable location), nature (1,500m stone curlew SPA constraint zone)
Brandon	B/31	Gas Lane, Lode Street	Included
Beck Row	BR/31	Land North of Wilde Street	Deferred – policy (unsustainable location)
Beck Row	BR/32	Crowground Farm	Deferred – policy (unsustainable location)
Exning	E/12	South of Burwell Road and west of Queens View	Included
Exning	E/14	Land at Glenmore, Windmill Hill	Deferred – policy (unsustainable location), flooding (over 50% Flood Zones 2/3)
Exning	E/15	Marsh Stables, Church Street	Deferred – equine policy
Exning	E/16	Greater Exning	Deferred – policy (unsustainable scale & location)

Settlement	Site Reference	Location	2016 SHLAA Status
Kentford	K/10b	Land east of Kentford Lodge	Deferred - Nature (1,500m stone curlew SPA constraint zone). Heritage.
Kentford	K/18	Land South of Bury Road	Deferred – policy (unsustainable location), nature (1,500m stone curlew SPA constraint zone).
Mildenhall	M/48*	USAFE Air base Mildenhall	Included
Newmarket	N/09a	Southern portion of Brickfield Stud, Exning Road	Included
Newmarket	N/09b	Brickfield Stud, Exning Road	Deferred – Equine Policy
Red Lodge	RL/15a	Land North of Red Lodge	Included
Red Lodge	RL/15b	Land North & East of Red Lodge, Either side of A11	Deferred - Nature (1,500m Stone Curlew SPA), Policy (unsustainable location)
Worlington	W/16	Land to West of Brambles	Deferred – policy (unsustainable location)
Worlington	W/17	Land between Newmarket Road & Golf Links Road	Deferred – policy (unsustainable location)

*Note: It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. For this reason the site has been included within the assessment although there is no certainty from the MoD over the deliverability and timescales for bringing the site forward (M/48 in the table above) at this stage. Further, it is unclear what proportion of the site will be allocated for residential development and what the quantum of development might be. For this reason, although the site is 'included' within the assessment, it does not contribute to the council's estimates of housing supply at this stage (see tables 5 & 6 below).

4. Deferring sites

- 4.1 A system of sieving sites is a necessary part of the SHLAA process that assists in identifying those sites that offer a realistic opportunity of coming forward for development. The sieving process involves an assessment of the sites suitability, availability and achievability. In respect of those sites that were deferred in the previous SHLAA (published August 2015) it was made clear at the time of the assessment that they could still come forward for development if particular constraint(s) acting upon the sites (such as flooding, policy or ownership issues) could be remediated. Therefore, one element of this review has been to determine whether or not this applied to any of those existing sites.
- 4.2 Equally, it is important to consider whether or not any constraints have emerged that impact upon any of the sites that were included in the previous SHLAA which means that they should now be deferred.
- 4.3 The SHLAA guidance states that in order for sites to be developable (and consequently feature as an included site in this SHLAA) they should be:
- **suitable** - the site offers a suitable location for housing development and would contribute to the creation of sustainable mixed communities;
 - **available** - a site is considered available for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that it is controlled by a housing developer, or the landowner has expressed an intention to sell;
 - **achievable** - there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the ability of the developer to complete the housing over a particular time period.
- 4.4 Of the sites identified at the time of the previous SHLAA, 48 have subsequently been removed from the sites database as identified in Table 2 below.

Table 2: The 48 sites removed subsequent to the previous SHLAA Review Report publication, (August 2015).

Site reference	Settlement	Location	Reason for removal
B/08	Brandon	Evergreen, Bury Road	Under construction/completed
B/02	Brandon	Land to rear of the High Street	This is a 2003 Urban Capacity Study (UCS) site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
B/03	Brandon	Land to rear of 9-11 Victoria Road	Site with fragmented land ownership pattern. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
B/04	Brandon	Land to rear of London Road, St Peter's Place and Park View	Site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
B/05	Brandon	Land to rear of 99-107 Thetford Road and Webbs Row	The council have recently been informed by the landowner that this site is unavailable for development.
B/16*	Brandon	21 Market Hill	Site is below the SHLAA site size threshold.
B/21*	Brandon	Dove Cottage, Dove House Drove	This site is below the SHLAA size threshold.
B/25	Brandon	Land to rear of Thetford Road	This is a 2003 UCS site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
M/03	Mildenhall	Land to the rear 91-105 Folly Road	This is a 2003 UCS site with fragmented land ownership. Minimal prospect (or evidence

Site reference	Settlement	Location	Reason for removal
			provided) of this site being made available for development in the short/medium/long term.
M/04	Mildenhall	Land to the rear 98-108 Folly Road	This is a 2003 UCS site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
M/05	Mildenhall	Land to rear of 41 Folly Road	Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
M/07	Mildenhall	Land to the rear 22-28 Junction Road	Site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
M/09	Mildenhall	Land off College Heath Road	No ownership information or submission(s) to the council suggesting that this site is likely to be made available in the short/medium/long term.
M/18	Mildenhall	Land south of Lark Road	Amalgamated with site M/15
M/20	Mildenhall	Land south of Pine Trees Avenue	Amalgamated with site M/15
M/22	Mildenhall	Land south of Mildenhall to River Lark (including Jubilee Fields).	Amalgamated with site M/15
M/21	Mildenhall	Land west of Miles Hawk Way	Amalgamated with site M/19
M/31*	Mildenhall	Riverside House off Worlington Road	Site is below SHLAA site size threshold
M/42	Mildenhall	Rose Forge, South of	Amalgamated with site M/41

Site reference	Settlement	Location	Reason for removal
		Worlington Road	
N/09	Newmarket	Brickfield Stud, Exning Road	Site subdivided - see 'new' sites N/09a and N/09b above. Part of this site is a 'Preferred' allocation within the context of the emerging Site Allocations Local Plan document - reference N1(a).
N/13	Newmarket	Land at Junction of Exning Road and Brickfield Avenue	No ownership information or submission(s) to the council suggesting that this site is likely to come forward in the short/medium/long term.
L/05	Lakenheath	Land to the rear 84-142 High Street	This is a 2003 UCS site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
L/08	Lakenheath	Land to the rear 2-6 Cemetery Road	Completed
L/09	Lakenheath	Land to the rear 11-13 Back Street	This is a 2003 UCS site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
L/10	Lakenheath	Land to the rear 27-29 Eriswell Road	This is a 2003 UCS site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
L/39	Lakenheath	Land north of The Drift	Amalgamated with site L/12. The combined site area is 'preferred' within the context of the emerging Site Allocations Local Plan, reference

Site reference	Settlement	Location	Reason for removal
			L2(d).
RL/01	Red Lodge	Land to rear 2-4 Elms Road and 6-8 Turnpike Road	This is a 2003 UCS site with fragmented land ownership. The site is partially completed (2 detached bungalows) and there is minimal prospect (or evidence provided) of the remainder of the site being made available for development in the short/medium/long term.
RL/02	Red Lodge	Land to rear 14-16 Turnpike Road	This is a (2003) UCS site with fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
RL/04	Red Lodge	Cooper's Yard and Cafe	Amalgamated with site RL/03. Part of this site is a 'preferred' allocation within the context of the emerging Site Allocations Local Plan - reference RL1(a).
RL/15	Red Lodge	Land North & East of Red Lodge, Either side of A11	Now forms part of 'new' site RL/15b – see above. Part of 'former' site RL/15 is a 'preferred' allocation within the context of the emerging Site Allocations Local Plan - reference RL2(a).
RL/16	Red Lodge	Employment land north of Hundred Acre Way	Now forms part of 'new' site RL/15a – see above. This 'former' site forms part of a 'preferred' allocation within the context of the emerging Site Allocations Local Plan document – references RL2(a) and EM2(n).
RL/20	Red Lodge	Land North of Elderberry Road	Now forms part of 'new' site RL/15a – see above. This 'former' site forms part of a 'preferred' allocation within the context of the emerging Site Allocations Local Plan

Site reference	Settlement	Location	Reason for removal
			document – reference RL2(a).
RL/21	Red Lodge	Land north-east of Bilberry Close	Now forms part of ‘new’ site RL/15a – see above. This ‘former’ site forms part of a ‘preferred’ allocation within the context of the emerging Site Allocations Local Plan document – reference RL2(a).
BR/04	Beck Row	Land to the rear 31-45 The Street	Fragmented land ownership. Minimal prospect (or evidence provided) of this site being made available for development in the short/medium/long term.
BR/15*	Beck Row	Land adjacent to Beck House	Site below SHLAA site size threshold.
BR/23	Beck Row	Land at White Gables, Stocks Corner	Amalgamated with site BR/05
BR/25*	Beck Row	Land at Flint Cottage	Site below SHLAA site size threshold.
E/05*	Exning	Land behind 163 Burwell Road	Site below SHLAA site size threshold.
E/06*	Exning	2nd field behind nos. 163-169 Burwell Road	Site below SHLAA site size threshold.
E/10*	Exning	Land adjacent to 39 Cotton End Road	Site below SHLAA site size threshold.
E/11*	Exning	Land between 11 and 15 Cotton End Road	Site below SHLAA site size threshold.
WR/03*	West Row	Land west of “Jen Rod”, The Green	Site below SHLAA site size threshold.
WR/21*	West Row	Red Shed Pott Hall Road	Site below SHLAA site size threshold.
WR/31*	West Row	Land to rear 135a Church Road	Site below SHLAA site size threshold.

Site reference	Settlement	Location	Reason for removal
WR/32*	West Row	Land West of Pamments Lane	Site below SHLAA site size threshold.
F/06*	Freckenham	Land adjacent to Millfield, Fordham Road	Site below SHLAA site size threshold.
W/15*	Worlington	Land South of the Meadows	Site below SHLAA site size threshold.
HI/02*	Higham	Land adjacent to The Apiaries	Site below SHLAA site size threshold.

*Note: Sites below 0.2ha have been removed entirely as the Planning Practice Guidance (PPG) and SHLAA methodology identify that they are too small for consideration as part of the assessment, (all of these sites had a previous status of deferred). The sites can still come forward as 'windfall' development.

- 4.5 All of the remaining sites identified within the previous SHLAA and those 18 sites identified subsequently (table 1 above) have been assessed by officers in terms of their suitability, availability and achievability. The sites have been considered against a number of known constraints (as agreed previously with the Housing Market Partnership) such as flooding or a nature conservation designation (see Table 3 below). If it was felt that a particular constraint on development could not realistically be overcome it has been deferred for the purposes of calculating potential housing delivery in the district at this time.

Table 3: Reasons given for deferring sites

Reasons for deferring	Explanation
Access	The site is land-locked or there are other significant constraints on access at this time
Community	The site constitutes a valued community facility at this time
Employment	The site is in a (valued) employment use
Flood Zone	At least 50% of site is within Flood Zone 2 or 3 at this time
Nature	The site has a nature designation (CWS, SAC, SPA, SSSI, LNR) and evidence of appropriate mitigation is required prior to development taking place
Open space	The site is a (valued) public open space
Ownership	The site has complex multiple ownership issues which would effect deliverability at this time
Policy	There is a (retained) Local Plan (1995), adopted Core Strategy and/or Joint

	Development Management Policies Document policy constraint at this time
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- 4.6 Following a desk-top analysis of all sites and consideration of representations made on the draft version of the SHLAA, of the 208 sites (both original and new) it is considered that 107 of these should be deferred on one or more of the grounds identified in table 3 above. This includes 12 of the newly identified sites (see table 1 above). A list of all of these sites, along with the reasons for deferring them, can be found at Appendix 1. However, it should be noted that the fact that a site is deferred does not preclude it from development at some point in the future should appropriate mitigation be identified.
- 4.7 **Sites within the Breckland SPA constraints zones:** To ensure a consistent approach is taken towards sites that are the subject of nature designations and to ensure alignment with the adopted Core Strategy Policy CS2: Natural Environment, sites which are constrained by the Breckland SPA (designations for stone curlew, woodlark and/or nightjar) have been deferred for the purposes of the SHLAA where a Habitats Regulations Assessment (HRA) would be a pre-requisite to development. As and when no harm to the SPA qualifying feature has been demonstrated by appropriate assessment, to the satisfaction of the local planning authority and Natural England, the specific site(s) can be included within a future iteration of the SHLAA. Advice received from Natural England confirms this as an appropriate policy stance.
- 4.8 **Sites with other designations for nature conservation:** Where a site is subject to any nature designation other than that described in paragraph 4.7 above (such as a County Wildlife Site, Local Nature Reserve or Site of Special Scientific Interest) evidence of appropriate mitigation must be provided, to the satisfaction of the local planning authority and/or Natural England, before it can be considered for inclusion within future iterations of the SHLAA. Advice received from Natural England confirms this as an appropriate policy stance.

5. Estimating housing potential

- 5.1 The site sieving process outlined above has identified 101 sites as potentially suitable for housing, covering some 950ha of land. A crude estimate of housing potential, based on 30 dwellings per hectare, is 28,514 dwellings. All of these sites have been further investigated with an assessment completed for every site included in the SHLAA shown at Appendix 2. The assessment gives a realistic estimate of the potential yield of each site and an indication of when the site is likely to come forward for development.
- 5.2 Where a site is subject to an extant permission, or allocated within a local plan (existing or emerging) or dwelling capacities have been identified in subsequent concept statements or masterplans, then the identified yield (number of dwellings specified) will be used in the assessment unless additional information has come to light to indicate an increase or decrease would be appropriate. For other sites, the adopted Core Strategy Policy CS1: Spatial Strategy, sets out the settlement hierarchy and this will be used as a basis for calculating the approximate dwelling numbers appropriate on sites in towns, key service centres, primary villages, secondary villages and other identified settlements as follows:

Table 4: Council dwelling estimations

Market town	Key service centre	Primary village	Secondary village	Small settlement
30 dwellings per hectare	30 dwellings per hectare	30 dwellings per hectare	30 dwellings per hectare (maximum 12 dwellings per site)	30 dwellings per hectare (maximum 5 dwellings per site)

- 5.3 Within the emerging Site Allocations Local Plan (SALP) document, for some strategic sites, i.e. over 100 dwellings, 60% only of the site has been calculated at 30 dwellings per hectare to allow for infrastructure provision on site, (evidenced by Natural England Sites of Scientific Interest (SSSI) impact zone setting limit for sites over 100 dwellings). Again, for mixed use sites, a lower density may be assumed within the context of the emerging SALP, reflecting the portion of the site likely to be available for residential development. Where a lower or bespoke density figure is assumed, this is indicated within the context of the relevant site proforma (see appendix 2).
- 5.4 A crude estimation of total capacities at 20, 30, 40 and 50 dwellings per hectare is provided in table 5 below to allow for any subjectivity in the council estimations. This demonstrates that the council's estimations are at the lower end of the scale, and there may be potential to increase capacities if required. A full review of all sites will be undertaken again in due course.

Table 5: SHLAA site dwelling estimations

Settlement	Number of Sites	Size (Ha.)	20dph	30dph	40dph	50dph	Council's estimated capacity
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Brownfield

Brandon	3	2	40	60	80	100	68
Mildenhall	4	447	8948	13422	17896	22371	*128
Newmarket	3	3	57	86	115	144	99
Lakenheath	4	3	69	104	138	173	61
Red Lodge	0	0	0	0	0	0	0
Beck Row	3	5	93	140	186	233	132
Exning	0	0	0	0	0	0	0
Kentford	0	0	0	0	0	0	0
West Row	2	2	41	61	82	102	61
Barton Mills	1	0	7	10	13	17	10
Freckenham	1	1	11	17	22	28	12
Gazeley	0	0	0	0	0	0	0
Holywell Row	0	0	0	0	0	0	0
Worlington	2	1	15	22	29	37	20
Dalham	0	0	0	0	0	0	0
Higham	0	0	0	0	0	0	0

Totals

	23	464	9281	13921	18561	23202	591
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Mixed

Brandon	0	0	0	0	0	0	0
Mildenhall	0	0	0	0	0	0	0
Newmarket	3	10	210	315	420	525	*94
Lakenheath	1	22	448	672	896	1120	375
Red Lodge	4	44	878	1318	1757	2196	629
Beck Row	4	7	141	212	282	353	218
Exning	0	0	0	0	0	0	0
Kentford	2	4	77	116	154	193	81
West Row	9	17	336	504	673	841	504
Barton Mills	0	0	0	0	0	0	0
Freckenham	1	0	7	11	14	18	10
Gazeley	2	4	70	106	141	176	24
Holywell Row	1	0	9	13	17	22	12
Worlington	0	0	0	0	0	0	0
Dalham	1	1	19	29	38	48	5
Higham	0	0	0	0	0	0	0

Totals

	28	110	2196	3294	4392	5490	1952
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Greenfield

Brandon	0	0	0	0	0	0	0
Mildenhall	3	93	1862	2793	3724	4655	1342
Newmarket	3	68	1365	2048	2731	3414	507
Lakenheath	9	42	838	1257	1676	2095	1056
Red Lodge	3	19	390	584	779	974	495
Beck Row	8	45	907	1361	1814	2268	1324
Exning	3	39	789	1184	1579	1974	410
Kentford	1	4	74	111	148	185	60
West Row	10	22	445	667	889	1112	340
Barton Mills	2	1	25	38	50	63	24
Freckenham	2	1	18	27	36	45	24
Gazeley	1	2	30	46	61	76	20
Holywell Row	1	27	549	824	1098	1373	12
Worlington	3	12	230	346	461	576	33
Dalham	0	0	0	0	0	0	0
Higham	1	1	10	15	20	25	5

Totals

	50	377	7533	11299	15066	18832	5652
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Grand Totals

	101	950	19009	28514	38019	47524	8195
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*The table above does not include a council estimated capacity for sites N/11 or M/48 at this stage as the yield for these sites has yet to be determined.

5.5 Table 6 below illustrates the potential availability for development of the SHLAA sites. Where information is unknown in terms of ownership, general developer interest or infrastructure constraints, sites are categorised in the latter two phases of the plan period to allow time for this information to be ascertained. The timescales are as follows:

- 1-5 years;
- 6-10 years;
- 11-15 years.

5.6 As a general rule brownfield sites with few constraints have been identified as being deliverable in 1-5 years and those with some constraints as being deliverable in 6-10 years. The timeframes for delivering green-field sites have been identified using information obtained on land ownership and constraints when researching the sites. It should be recognised that all of the timeframes are estimates only for the purposes of the SHLAA. The Local Planning Authority may need to phase development of sites to ensure that requisite infrastructure is in place at the appropriate time.

5.7 Where information on availability has been put forward by the landowner or developer, officers have attempted to assess how realistic this information

might be in terms of the need to deliver infrastructure first on some sites, or remediate other constraints such as the issue of multiple ownerships.

Table 6: SHLAA site timeframe estimations

Settlement	1 to 5 years	6 to 10 years	11 to 15 years

Brownfield

Brandon	68	0	0
Mildenhall	69	59	*0
Newmarket	10	73	16
Lakenheath	37	24	0
Red Lodge	0	0	0
Beck Row	132	0	0
Exning	0	0	0
Kentford	0	0	0
West Row	8	53	0
Barton Mills	10	0	0
Freckenham	0	12	0
Gazeley	0	0	0
Holywell Row	0	0	0
Worlington	0	20	0
Dalham	0	0	0
Higham	0	0	0

Totals

	334	241	16
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Mixed

Brandon	0	0	0
Mildenhall	0	0	0
Newmarket	94	0	*0
Lakenheath	180	195	0
Red Lodge	50	285	294
Beck Row	218	0	0
Exning	0	0	0
Kentford	34	47	0
West Row	167	337	0
Barton Mills	0	0	0
Freckenham	0	10	0
Gazeley	24	0	0
Holywell Row	12	0	0
Worlington	0	0	0
Dalham	5	0	0
Higham	0	0	0

Totals

	784	874	294
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Greenfield

Brandon	0	0	0
Mildenhall	92	250	1000
Newmarket	350	70	87
Lakenheath	569	410	77
Red Lodge	254	241	0
Beck Row	941	383	0
Exning	270	140	0
Kentford	60	0	0
West Row	219	121	0
Barton Mills	24	0	0
Freckenham	24	0	0
Gazeley	20	0	0
Holywell Row	0	12	0
Worlington	21	12	0
Dalham	0	0	0
Higham	5	0	0

Totals

	2849	1639	1164
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Grand Totals

	3967	2754	1474
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*The table above does not include a council estimated capacity for sites N/11 or M/48 at this stage as the yield for these sites has yet to be determined.

- 5.8 It is clear from the table above that the sites identified could potentially be phased to achieve a good spread of development over the 15 year timeframe between the district's towns and villages. Clearly, the delivery of all sites will be dependent on adequate infrastructure being in place and as such these timescales may be subject to change and indeed the completion of some of the larger sites may carry over into the next plan period.

6. SHLAA progress and review

- 6.1 Forest Heath District Council is publishing this SHLAA as background evidence to demonstrate sufficient housing land availability up to 2031. It should be noted that the SHLAA does not allocate housing sites for development. Specific sites will be considered for inclusion within the context of the Site Allocations Local Plan Document (SALP) which will be the subject of consultation and independent scrutiny, in its own right and prior to formal adoption. Information on specific sites will need to be updated on a regular basis, and this will be done by regularly updating the SHLAA.

Part B - St Edmundsbury Borough Council

This section of the report contains:

- a comprehensive review of the potential housing sites identified within the previous SHLAA (both included and deferred) supplemented with any new information and where appropriate, a revised assessment of suitability, availability and achievability, (including viability considerations);
- a comprehensive review of the 17 new sites brought to the attention of council or identified by officers subsequent to the publication of the previous SHLAA review report published August 2015;
- an update on the housing market in more general terms and consideration of any other matters affecting housing delivery in the borough as identified by officers.

Table 7: The 17 new sites (highlighted rows relate to SHLAA CFS submissions or sites that have been identified by officers post consultation)

Site reference	Settlement	Location	2016 SHLAA Status
SEBAR04	Barrow	Land West of Mill Lane Barrow	Included
SEBAR05	Barrow	Further land west of Barrow Hill - 'Option 2'	Deferred - Unsustainable location, coalescence (Denham End)
SEBAR06	Barrow	Land south east of Denham End - 'Option 3'	Deferred - Unsustainable location, coalescence (Denham End)
SEBSE06	Bury St Edmunds	Land at Westfield Farm, Compiegne Way	Deferred (unsustainable/un suitable location)
SEBSE07	Bury St Edmunds	Parcel of land north of Olding Road	Deferred - Bury Vision 2031 Local Plan (employment) allocation - see BV14(l) and BV15(g).
SEBSE08	Bury St Edmunds	Parcel of land south of Olding Road	Deferred - Bury Vision 2031 Local Plan (employment) allocations - see BV14(l) and BV15(g).
SEFSM01	Fornham St Martin	Land east of Culford Road	Deferred - Unsustainable scale and location
SEFSM02	Fornham St	Land east of Thetford	Deferred -

	Martin	Road	Unsustainable scale and location
SEFSM03	Fornham St Martin	Land West of Thetford Road	Deferred - Unsustainable scale and location
SEGB01	Great Barton	Land north of Mill Road	Included
SEGB02	Great Barton	Land south of Mill Road	Included
SEIX01	Ixworth	land west of Bardwell Road	Included
SERIS03	Risby	Land south of the cricket pitch	Deferred - Conservation/wild life
SESTAN02	Stanton	Land adjoining the A143	Deferred (unsustainable location)
SESTAN03	Stanton	Land to the east of Homestead	Deferred (unsustainable location)
SESTAN04	Stanton	Land to the east of Ellan Vannin	Deferred (unsustainable location)
SESTAN05	Stanton	Land between Duke Street & George Lane	Deferred (unsustainable location)

7. Deferring sites

- 7.1 A system of sieving sites is a necessary part of the SHLAA process that assists in identifying those sites that offer a realistic opportunity of coming forward for development. The sieving process involves an assessment of the individual sites suitability, availability and achievability. In respect of those sites that were deferred within the previous SHLAA (published August 2015) it was made clear at the time of the assessment that they could still come forward for development if particular constraint(s) acting upon the site(s), (such as flooding, policy or ownership issues), could be remediated. Therefore, one element of this review has been to determine whether or not this applied to any of the existing sites.
- 7.2 Equally, it is important to consider whether or not any constraints have emerged that impact upon any of the sites that were included in the previous SHLAA which means that they should now be deferred.
- 7.3 The SHLAA guidance states that in order for sites to be developable (and consequently feature as an included site in this SHLAA) they should be:
- **suitable** - the site offers a suitable location for housing development and would contribute to the creation of sustainable mixed communities;
 - **available** - a site is considered available for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that it is controlled by a housing developer, or the landowner has expressed an intention to sell;
 - **achievable** - there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the ability of the developer to complete the housing over a particular time period.
- 7.4 Of the sites identified at the time the previous SHLAA was published, 156 have subsequently been removed from the sites database for the reason(s) identified within Table 8 below.

Table 8: The 156 sites removed subsequent to the previous SHLAA Review Report publication (August 2015).

7.5 Note: Sites below 0.2ha have been removed as the Planning Practice Guidance (PPG) and SHLAA methodology identify that they are too small for consideration as part of the assessment. A full list of these 153 sites (which all had a previous status of deferred as a consequence of their size) can be found at Appendix 7. This is not to say that the sites cannot come forward as 'windfall' development. Other removed sites are identified in the table below.

Site reference	Settlement	Location	Reason for removal
WS20	Barningham	Land north of Hepworth Road	Amalgamated with revised site area SEBARN01
SEBARN02	Barningham	Land north of Hepworth Road	Amalgamated with revised site area SEBARN01
WS77	Barrow	Land west of Barrow Hill	Duplicate SHLAA entry (WS77 & SEBAR02). Reference to WS77 has been removed.

7.6 All of the remaining sites identified within the context of the previous SHLAA and those 17 'new' sites identified subsequently (table 7 above) have been assessed in terms of their suitability, availability and achievability. The sites have been considered against a number of known constraints (as agreed previously with the Housing Market Partnership) such as flooding or a nature conservation designation (see Table 9 below). If it was felt that a particular constraint on development could not realistically be overcome, the site has been deferred for the purposes of calculating potential housing delivery in the Borough at this time.

Table 9: Reasons given for deferring sites

Reasons for deferring	Explanation
Access	There are significant access restrictions pertaining to the site at this time
Archaeology	The site contains an area of archaeological importance that cannot be mitigated
Community	The site comprises a community facility valued at this time, for example, community centres, meeting halls, health facilities, day care centres, educational premises and library facilities.
Contamination	There are high levels of contamination present on the site rendering it unsuitable for housing at this time.
Conservation/Wildlife	There is a national conservation or wildlife designation that cannot be mitigated at this

Reasons for deferring	Explanation
	time. These deal, in particular, with Special Protection Areas where the case must be proven that there are no alternative solutions and that the development is in the overriding public interest.
Employment	The site is in an existing employment use that is valued at this time.
Flood Zone	At least 50% of the site is within Flood Zones 2 and/or 3 which cannot be mitigated against rendering the site unsuitable for development at this time.
Legal	The site has legal issues at this time
Location	The site is not adjacent to the existing settlement
Nature	The site has a nature designation that cannot be mitigated at this time.
Open space	The site comprises a public open space that is valued at this time
Ownership	The site has complex multiple ownership issues which would effect deliverability at this time
Proposed Use	The site is proposed for a use other than housing at this time
Scale	The site is of an inappropriate scale in respect of its surroundings
Unavailable	The site is unavailable as a consequence of an existing use at this time
Unsustainable	The site is in an unsustainable location, is not adjacent to a housing settlement boundary, is in open countryside and/or is located in a settlement with no or very few community facilities.
Unviable	The site is unviable as a residential development at this time
Utility	Valued utility site making it unsuitable for residential development at this time.

7.7 Following a desk-top appraisal of all sites and consideration of the representations made on the draft version of the SHLAA at the formal consultation stage, of the total of 315 sites it is considered that 219 of these should be deferred on one or more of the grounds identified in table 9 above. A list of all of these sites, along with the reasons for deferring them, can be found at Appendix 2. However, it should be noted that the fact that a site is deferred does not preclude it from development at some point in the future should appropriate mitigation be identified.

8. Estimating Housing Potential

- 8.1 The site sieving process outlined above has identified 96 remaining sites as potentially suitable for housing, covering some 936 ha of land. A crude estimate of housing potential, based on 30 dwellings per hectare, is 28,091 dwellings. All of these sites have been further investigated with an assessment completed for every site included in the SHLAA to be found at Appendix 5. The assessment gives a realistic estimate of the potential yield of each site and an indication of when the site is likely to come forward for development.
- 8.2 For those sites identified through the Bury St Edmunds Vision 2031, Haverhill Vision 2031, and Rural Vision 2031 Local Plans, or previous urban capacity studies, the dwelling capacities identified within these documents or subsequent concept statements or master plans will be used, unless additional information has come to light to suggest an increase or decrease would be appropriate. For other sites, the adopted Core Strategy policy CS4 identifies the settlement hierarchy and the scale of provision appropriate in those settlements and this will be used as a basis for calculating the approximate dwelling numbers appropriate on sites in the towns, key service centres, local service centres and infill villages.

Table 10: Council dwelling estimations

Towns	Key service centres	Local service centres	Infill villages
30 dwellings per hectare	30 dwellings per hectare	30 dwellings per hectare (maximum 20 dwellings per site)	N/A (less sustainable locations)

- 8.3 A crude estimation of total capacities at 20, 30, 40 and 50 dwellings per hectare is provided in table 11 below to allow for any subjectivity in council estimations. This demonstrates that the council's estimations are at the lower end of the scale and there may be potential to increase capacities if required. A full review of all sites will be undertaken again in due course.

Table 11: SHLAA site dwelling estimations

Settlement	Number of Sites	Size (Ha.)	20dph	30dph	40dph	50dph	Council's estimated capacity
Brownfield							
Bardwell	2	1	17	26	34	43	23
Barningham	0	0	0	0	0	0	0
Barrow	0	0	0	0	0	0	0
Bury St Edmunds	14	23	469	704	938	1173	769
Cavendish	0	0	0	0	0	0	0
Chedburgh	0	0	0	0	0	0	0
Clare	0	0	0	0	0	0	0
Great Barton	0	0	0	0	0	0	0
Great and Little Whelnetham	0	0	0	0	0	0	0
Great Thurlow	0	0	0	0	0	0	0
Haverhill	5	4	78	117	156	195	167
Hopton	0	0	0	0	0	0	0
Hundon	0	0	0	0	0	0	0
Ingham	1	1	16	24	32	40	22
Ixworth	1	1	10	15	20	25	16
Kedington	0	0	0	0	0	0	0
Risby	0	0	0	0	0	0	0
Rougham	0	0	0	0	0	0	0
Stanton	0	0	0	0	0	0	0
Wickhambrook	0	0	0	0	0	0	0

Totals

	23	29	590	885	1180	1475	997
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Mixed

Bardwell	0	0	0	0	0	0	0
Barningham	0	0	0	0	0	0	0
Barrow	3	13	267	401	534	668	349
Bury St Edmunds	1	6	124	186	248	310	186
Cavendish	0	0	0	0	0	0	0
Chedburgh	0	0	0	0	0	0	0
Clare	0	0	0	0	0	0	0
Great Barton	0	0	0	0	0	0	0
Great and Little Whelnetham	1	2	40	60	80	100	58
Great Thurlow	1	0	5	8	10	13	5
Haverhill	0	0	0	0	0	0	0
Hopton	0	0	0	0	0	0	0
Hundon	0	0	0	0	0	0	0
Ingham	0	0	0	0	0	0	0
Ixworth	1	7	147	221	295	369	221
Kedington	0	0	0	0	0	0	0
Risby	0	0	0	0	0	0	0
Rougham	0	0	0	0	0	0	0

Stanton	1	10	210	314	419	524	314
Wickhambrook	0	0	0	0	0	0	0

Totals

	8	40	793	1190	1586	1983	1133
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Greenfield

Bardwell	1	0	6	9	12	15	9
Barningham	2	12	243	364	485	607	40
Barrow	5	17	339	509	679	849	509
Bury St Edmunds	12	457	9133	13700	18267	22834	8221
Cavendish	1	0	8	12	16	20	10
Chedburgh	6	14	276	414	552	690	110
Clare	4	33	651	976	1302	1627	326
Great Barton	5	33	651	976	1302	1627	120
Great and Little Whelnetham	1	0	8	12	16	20	10
Great Thurlow	0	0	0	0	0	0	0
Haverhill	5	184	3684	5526	7369	9211	3780
Hopton	3	7	131	197	262	328	65
Hundon	3	19	375	563	751	938	60
Ingham	1	38	764	1147	1529	1911	20
Ixworth	2	14	286	429	572	715	170
Kedington	2	5	101	152	202	253	138
Risby	2	4	79	118	157	197	40
Rougham	2	1	25	38	50	63	27
Stanton	2	8	170	255	340	425	255
Wickhambrook	6	21	414	620	827	1034	122

Totals

	65	867	17344	26016	34689	43361	14032
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Grand Totals

	96	936	18727	28091	37455	46819	16162
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8.4 Table 12 below illustrates the potential availability for development of the SHLAA sites. Where information is unknown in terms of ownership, general developer interest or infrastructure constraints, sites are categorised in the latter two periods to allow time for this information to be ascertained. The timescales are as follows:

- 1-5 years;
- 6-10 years;
- 11-15 years.

8.5 As a general rule, brownfield sites with few constraints have been identified as 1-5 years and those with some constraints as 6-10 years. The timeframes for delivering Greenfield sites have been identified using information obtained on land ownership and constraints when researching the sites. It should be recognised that all of the timeframes are estimates only for the purposes of the SHLAA. The

local planning authority may need to phase development of sites to ensure that requisite infrastructure is first in place.

- 8.6 Where information on availability has been put forward by the landowner or developer, officers have attempted to assess how realistic this information might be in terms of the need to deliver infrastructure first on some sites, or remediate other constraints such as the issue of multiple ownership.

Table 12: SHLAA site timeframe estimations

Settlement	1 to 5 years	6 to 10 years	11 to 15 years
Brownfield			
Bardwell	14	0	9
Barningham	0	0	0
Barrow	0	0	0
Bury St Edmunds	469	25	275
Cavendish	0	0	0
Chedburgh	0	0	0
Clare	0	0	0
Great Barton	0	0	0
Great and Little Whelnetham	0	0	0
Great Thurlow	0	0	0
Haverhill	154	0	13
Hopton	0	0	0
Hundon	0	0	0
Ingham	22	0	0
Ixworth	16	0	0
Kedington	0	0	0
Risby	0	0	0
Rougham	0	0	0
Stanton	0	0	0
Wickhambrook	0	0	0
Totals			
	675	25	297
Mixed			
Bardwell	0	0	0
Barningham	0	0	0
Barrow	75	0	274
Bury St Edmunds	0	0	186
Cavendish	0	0	0
Chedburgh	0	0	0
Clare	0	0	0
Great Barton	0	0	0
Great and Little Whelnetham	58	0	0
Great Thurlow	5	0	0

Haverhill	0	0	0
Hopton	0	0	0
Hundon	0	0	0
Ingham	0	0	0
Ixworth	0	0	221
Kedington	0	0	0
Risby	0	0	0
Rougham	0	0	0
Stanton	0	0	314
Wickhambrook	0	0	0

Totals

	138	0	995
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Greenfield

Bardwell	0	0	9
Barningham	0	0	40
Barrow	0	0	509
Bury St Edmunds	2020	2005	4196
Cavendish	10	0	0
Chedburgh	0	0	110
Clare	64	0	262
Great Barton	40	0	80
Great and Little Whelnetham	0	0	10
Great Thurlow	0	0	0
Haverhill	935	1720	1125
Hopton	25	0	40
Hundon	0	20	40
Ingham	0	0	20
Ixworth	90	80	0
Kedington	40	0	98
Risby	20	0	20
Rougham	12	0	15
Stanton	0	0	255
Wickhambrook	22	0	100

Totals

	3278	3825	6929
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Grand Totals

	4091	3850	8221
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8.7 It is clear from the table above that the sites identified could potentially be phased to achieve a good spread of development over the 15 year timeframe between the Borough's towns and villages. Clearly, the delivery of all sites will be dependent on adequate infrastructure being in place and as such these timescales may be subject to change and indeed the completion of some of the larger sites may carry over into the next plan period.

9. SHLAA progress and review

- 9.1 St Edmundsbury Borough is publishing this SHLAA as background evidence to demonstrate sufficient housing land availability up to 2031. This report does not allocate housing sites for development. The allocation of specific sites has been carried out in the three Vision 2031 Local Plan documents adopted in September 2014. Information on specific sites will need to be updated on a regular basis, and this will be done by regularly updating the SHLAA.

10. Contacts

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11. Glossary of terms used in the report

Brownfield land or site: land which is or was occupied by a permanent structure, (excluding agricultural or forestry buildings), and associated fixed surface infrastructure.

Flood Zones 1, 2 and 3: Flood Zones are areas defined by the Environment Agency that relate to past levels of river or coastal flooding and are related to future potential risk of flooding. Flood zone 3 relates to areas of land that are most often flooded, such as existing flood plains, whereas flood zone 1 relates to areas of low flood risk.

Greenfield land or site: greenfield land or sites are areas of land that have not been previously developed. Such land would include public open space, playing fields, allotments and agricultural land.

Settlement boundary: This is a line on a map in an adopted local plan document that defines and encloses a settlement and to which area planning policies are related.

Settlement categories: The categories of settlement used in this report, are taken from the settlement hierarchies to be found within the Forest Heath and St Edmundsbury Core Strategies. The categories are based on the relative sustainability of settlements, ranked according to the amount and type of services available within them (e.g school, shop, medical centre) and accessibility in terms of public transport etc.

Site Allocations Local Plan Document: This is a document that defines on a plan where certain land uses are proposed to be located, for example, it may define new housing and employment sites.

Windfall housing sites: Windfall housing sites are those that have not been identified in advance in local (development) plans.