



*St Edmundsbury*  

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*BOROUGH COUNCIL*

**St Edmundsbury Borough Council  
Assessment of a five year supply of housing land  
taking a baseline date of 31 March 2017**

**The five years covered in this assessment are  
1 April 2017 to 31 March 2022**

## 1. Introduction

- 1.1 National Planning Policy Framework (March 2012) requires Local 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 may be prepared and made available on the website.
- 1.2 This report sets out the availability of housing land supply for the period 2017-2022. It takes a baseline of 31 March 2017.

### Background

- 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 St Edmundsbury Local Plan includes the Core Strategy adopted 2010. Policy CS1 makes provision for 12,240 homes between 2009 and 2031. Para 4.10 states how these will be provided;

2008 - 2016	481 per annum
2017 - 2021	577 per annum
2022 - 2031	583 per annum

- 1.6 The Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 local plan documents were adopted in 2014, they provide an update to the housing provision since the Core Strategy adoption. In 2013 a strategic housing market assessment (SHMA) was prepared, this identifies a need to increase the number of new homes by 11,000 between 2011 to 2031. The Core Strategy provision to build 12,240 new homes between 2009 and 2031 was considered to remain appropriate in light of revised SHMA forecasts.
- 1.7 NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites.
- 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 five-year housing supply'.

## Calculating the Housing Need

- 1.12 For St Edmundsbury Borough Council the Vision 2031 local plan documents identify a residual requirement to plan for 11,480 new homes over the period 2012-2031.

### St Edmundsbury Five Year Housing Requirement

a.	Vision 2031 local plan housing requirement 2012-2031	11,480
b.	Actual net dwelling completions 2012 - 2017	1,613
c.	Residual requirement 2017 - 2031 (a-b)	9,867
d.	Annual requirement = 577 for years 2017-2021 and 583 for years 2021-2022	
e.	5 year requirement (577 x4 and 583)	2,891
f.	Under delivery since 2012, against requirement	792
	5 year requirement and shortfall including 20% buffer ((e + f) + 20%)	4,420

## 2. Five Year Housing Supply

- 2.1 As at 31 March 2017 a total of 1,613 dwellings have been completed since 2012. In order to meet the 11,480 dwelling requirement an additional 9,867 will need to be built in the 14 years from April 2017 to March 2031 (financial calendar period).
- 2.2 This assessment of supply includes sites completed and those with planning permission at 31 March 2017. A housing trajectory is included (appendix A) illustrating which sites will contribute to the five year supply and the provision for the remainder of plan period up to 2031.
- 2.3 Vision 2031 sites have been included in the 5 year supply where they are considered to be achievable in this timeframe. These include sites with planning permission, those currently subject of a planning application or where 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 St Edmundsbury's housing supply report all sites with planning permission have been included as making a contribution to the housing supply within the first five years, the strategic sites will be built out over a longer time period. Thereafter the housing trajectory takes a reasonable windfall allowance of 25 units per annum. This windfall allowance reflects a realistic assumption of sites likely to come forward, allowing for some to lapse.
- 2.5 The record of housing completions over the last 10 years from 2007 to 2017 show 9 years have shown under delivery against the housing target. A 20% buffer has therefore been applied.
- 2.6 No lapse rate has been applied. It should also be noted that the Council has not included any allowance for windfall sites in its 5 year supply, whereas in reality some windfalls will arise. This provides an additional comfort that the supply will be achieved.

### Five Year Deliverable Housing Supply

Identified Sites	As at April 2017
<b>Outstanding Unimplemented planning permissions (large)*</b>	<b>2044</b>
<b>Outstanding Unimplemented planning permissions (small)**</b>	<b>327</b>

<b>Bury St Edmunds, Haverhill and Rural Vision 2031 Local Plan allocated sites</b>	<b>2152</b>
Total supply	<b>4523</b>

\* Larger sites = 10 or more homes, as listed in trajectory

\*\* Small sites = under 10 homes

<b>Five year deliverable housing supply</b>	April 2017 – March 2022
<i>Annual Average requirement</i>	<b>578</b>
5 Year Identified Supply	<b>4523</b>
<b>Five year supply addressing unmet supply since 2012 (Sedgefield approach)</b>	
Shortfall units 2012-2017	792
Equates to 4523/884 including shortfall and 20% buffer	<b>5.1 year supply</b>
<b>Five year supply addressing unmet supply over the remainder of the plan period (Liverpool approach)</b>	
Equates to 4523/846 (9867/14 = 705) with 20% buffer	<b>5.3 year supply</b>

- 2.7 The NPPF states council's should aim to where possible, deal with under supply within the first 5 years of the plan period. In addressing the undersupply of 792 units since 2012, the housing land supply is 5.1 years including a 20% buffer (Sedgefield approach). A 20% buffer has also been applied to the shortfall.
- 2.8 In order to meet the housing requirement in St Edmundsbury this is dependent upon the delivery of seven strategic sites allocated in the Local Plan. Delay in the implementation of the sites scheduled to start earlier in the plan period, has led to under delivery in the last few years when measured against the plan target. This position is about to change as completions are starting to come through at BV4 (Moreton Hall, Bury St Edmunds) and commencement have begun at BV3 (North West, Bury St Edmunds). Development is expected to commence in the near future at HAV3 (North West, Haverhill) followed by HAV4 (North East, Haverhill), BV6 (North East, Bury St Edmunds) and BV7 (South East, Bury St Edmunds). Site allocation BV5 (West, Bury St Edmunds) is expected to commence in 2021/22. Applying a 20% buffer to the shortfall and overall requirement and addressing this shortfall within the first 5 years (Sedgefield approach) under these circumstances is not considered appropriate. There is adequate provision in the pipeline to meet the need over the plan period and annual supply is expected to increase in the next few years to address target delivery rates. For this reason the Council considers there is justification to use the Liverpool approach in this case at this point in time. The Liverpool approach gives rise to a housing land supply of 5.3 years, including a 20% buffer.

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 may be prepared and made available on the website.
- 3.2 St Edmundsbury BC considers the Liverpool is the appropriate method to use in measuring housing supply which gives a 5.3 year supply of housing land including a 20% buffer.

# Appendix A

Policy			Site	Capacity	Remaining	17/18	18/19	19/20	20/21	21/22
<b>SITES WITH PLANNING PERMISSION</b>		<b>Planning application reference</b>								
BSE 1f	Bury St Edmunds	SE/06/2414	Hardwick Industrial Estate	163	59	39	20			
BSE	Bury St Edmunds	DC/15/2138/FUL DC/14/1963/FUL SE/07/0460	Rear of 23-24 Queens Road	10	1	1				
BSE	Bury St Edmunds	DC/16/1628/VAR DC/13/0903/FUL	Westgate Street	25	25	25				
	Bury St Edmunds	DC/16/0120/P3JPA and DC/16/0798/FUL	100 Southgate Street	42	42	32	10			
	Bury St Edmunds	DC/16/0267/FUL	1A Tayfen Road	36	36		23	13		
BV3	Bury St Edmunds	DC/13/0932/HYB	Fornham (North-west)	950	950	80	160	160	160	160
BV4	Bury St Edmunds	DC/14/1881/HYB	Moreton Hall	500	499	80	100	100	100	100
BV8 (part)	Bury St Edmunds	DC/13/0906/FUL phase 1	Station Hill	135	135	50	50	35		
	Haverhill	SE/12/1339 SE/11/1064	Hanchet End Business Park	150	6	6				
	Haverhill	DC/15/1697/FUL	Burton End, Phase 3	13	13	13				
	Haverhill	DC/16/1015/FUL	William Blake Court	15	15		15			
HAV3	Haverhill	SE/09/1283 DC/16/2836/RM	North-west Haverhill	1150	1150		75	100	100	100
RA1b	Chedburgh	DC/13/0492/FUL SE/11/0384 and SE/08/0632	Bury Road, former fireworks factory	51	22	22				
RV20a	Great Whelnetham	DC/15/2277/HYB	Erskine Lodge	58	58	23			20	15
RV23a	Risby	DC/15/1308/RM DC/13/0520/OUT	Land adj to the cricket pitch, Risby	20	20	20				
RA14a	Stanton	SE/10/1410	Upthorpe Road	101	18	18				
RV22	Ingham	DC/16/0112/FUL (17/0608/FUL counted as small site)	Land at The Gables, Ingham	19	19	19				
			<b>sub total</b>							
			Small Sites Consents		327	145	95	30	30	27
			<b>SUB-TOTAL</b>		<b>3395</b>	<b>573</b>	<b>548</b>	<b>438</b>	<b>410</b>	<b>402</b>
<b>ALLOCATIONS IN THE BURY VISION 2031 DOCUMENT</b>										
BV5	Bury St Edmunds		Westley (West)	450	450					50
BV6	Bury St Edmunds		Compiegene Way (North-east)	1250	1250			50	150	150
BV7	Bury St Edmunds	DC/15/2483/OUT	Rougham Road (South-east)	1250	1250			50	100	125
BV10a	Bury St Edmunds		BSE Garden Centre, Rougham Road	30	30					
BV10b	Bury St Edmunds		Jacqueline Close	30	30				10	10
BV10c	Bury St Edmunds		Hospital site	45	45					
BV10h	Bury St Edmunds		Garages & Bus Depot, Cotton lane	50	50					
BV8 (part)	Bury St Edmunds	DC/15/1520/FUL	Station Hill	42	42					
BV9	Bury St Edmunds	DC/15/0689/OUT (part of BV9)	Tayfen Road	215	215			65	75	75
BV11	Bury St Edmunds		Ram Meadow	84	84				34	50
			<b>SUB-TOTAL</b>		<b>3446</b>	<b>0</b>	<b>0</b>	<b>165</b>	<b>369</b>	<b>460</b>
<b>ALLOCATIONS IN THE HAVERHILL VISION 2031 DOCUMENT</b>										
HAV4	Haverhill	DC/15/2151/OUT	North-east Haverhill	2500	2500			150	200	200
HAV 6a	Haverhill		Gasworks, Withersfield Road	10	10				10	
HAV 6c	Haverhill		Westfield Primary School	30	30				30	
HAV 5c	Haverhill		Former Castle Hill School	25	25				25	
HAV 5a	Haverhill		South of Chapelwent Road	85	85			25	50	10
HAV 7a	Haverhill		Wisdom Factory, Duddery Hill	75	75				25	50
HAV 17	Haverhill		Castle Manor & College	60	60					
			<b>SUB-TOTAL</b>		<b>2785</b>	<b>0</b>	<b>0</b>	<b>175</b>	<b>340</b>	<b>260</b>
<b>ALLOCATIONS IN THE RURAL VISION 2031 DOCUMENT</b>										
RV10b	Barrow	DC/16/0300/OUT	Land east of Barrow Hill, Barrow	75	75			25	25	25
RV 11b	Clare		Land off Cavendish Road, Clare	64	64			20	44	
RV12b	Ixworth		Off Crown Lane, Ixworth	90	90					
RV12c	Ixworth	DC/17/0333/FUL	Land west of A143 / south of A1088, Ixworth	80	80				30	50
RV 13b	Kedington	DC/14/1751/OUT	Land adj The Limes, Kedington	40	40			40		
RV16a	Cavendish		Land at end of Nether Road, Cavendish	10	10					10
RV17a	Chedburgh		Land at Queens Lane, Chedburgh	10	10					
RV 18	Great Barton		School Road, Great Barton	40	40				20	20
RV19	Great Thurlow	DC/17/1233/FUL	Goldings Farm	5	5		5			
RV20b	Great Whelnetham	DC/16/1268/FUL	Land off Tutelina Rise, Whelnetham	10	10			10		
RV21	Hopton	DC/15/2298/FUL	Land east of Bury Road, Hopton	25	25			25		
RV24a	Rougham		Land south of Kingshall Street, Rougham	12	12			12		
RV25a	Wickhambrook		Land at Nunnery Green/Cemetery Hill, W'Brook	22	22				22	
			<b>SUB-TOTAL</b>		<b>483</b>	<b>0</b>	<b>5</b>	<b>132</b>	<b>141</b>	<b>105</b>