



WhatHouse? Housebuilder of the Year

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**WRITTEN  
STATEMENT**

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MATTER 3

Forest Heath District  
Council

SIR Examination

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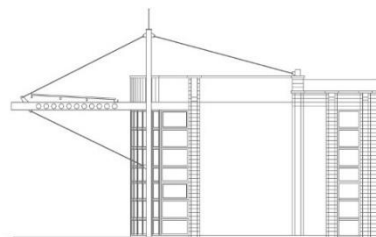
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1.0 This document is intended to set out additional material on which we will rely in the forthcoming Examination of the FHDC SIR.

2.0 In response to:

**3.3 Is there sufficient land available in the right places to deliver the level and spatial distribution of new homes planned for?**

- i. No. We do not object to the principle of Mildenhall as a location for sustainable growth. However, site allocation SA4, Land West of Mildenhall, proposes the delivery of 97 hectares of development for *'Mixed use to include 1300 dwellings with a local centre, a minimum of 5ha employment, schools, leisure facilities and public services'*. It is unrealistic and unachievable to deliver 1,300 houses on this site by 2031 along with the other infrastructure proposed. There is no project plan to demonstrate how the Council expects the site to be delivered. The site does not currently have planning permission nor has an application been submitted. Major developments of this type taking significant time to plan, design and deliver. The approach set out is simply overoptimistic. We set out under Matter 3.6 reasoning as to why West of Mildenhall cannot make the contribution suggested. There is not sufficient land available to deliver the plan.

3.0 In response to:

**3.4 a) It appears that within the various calculations presented, the 5% buffer is added before the shortfall figure, and thus excludes the shortfall. Should the shortfall figure be added before the 5% buffer is applied?**

- ii. Yes, the shortfall figure should be added before the buffer is applied. The NPPF at para. 47 states that the LPA should identify and update annually a supply of specific deliverable<sup>1</sup> sites sufficient to provide 5 years' worth of housing against their housing requirements "with an additional buffer..." It is clear therefore that the buffer is *additional* to the supply required. The "supply required" includes any shortfall and therefore the buffer must be added after the shortfall.

**3.4 b) Both the Sedgfield and Liverpool methods of calculating the five year requirement are contemplated in the Council's paper [B11]. Should the shortfall be addressed in the first five years (as in the Sedgfield method)? If not, why not?**

- iii. Yes, the calculations should follow the Sedgfield method to ensure the shortfall is addressed within the first five years. This approach accords with the Government's

requirement to boost significantly the supply of housing as set out in paragraph 47 of the NPPF and reduces the risk of under provision across the plan period. Not using the Sedgefield approach is the antithesis of the Government's approach to boosting significantly the supply of housing. The need for those new homes arises now. It is not appropriate, and not consistent with Government policy, for people to have their needs for new homes delayed into the future.

4.0 In response to:

**3.5 Has there been a record of persistent under delivery of housing, such that the buffer should be increased to 20% (for consistency with paragraph 47 of the Framework)?**

- iv. Table 1 below, based on the Council's published Annual Monitoring Reports, sets out housing completions by year against the development plan target. In only 5 of the last 15 years has the target been met or exceeded. Only once in the last 5 years has that been the case. In our view this amounts to 'a record of persistent under supply of housing' and a 20% buffer is required 'to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land' in accordance with paragraph 47 of the NPPF.

<b>Table 1: housing delivery in Forest Heath 2001 to 2016</b>			
year	target	delivery	%
2001/02	320	147	46%
2002/03	320	62	19%
2003/04	320	67	21%
2004/05	320	201	63%
2005/06	320	334	104%
2006/07	320	265	83%
2007/08	320	549	172%
2008/09	320	310	97%
2009/10	320	454	142%
2010/11	320	368	115%
2011/12	340	330	97%
2012/13	340	363	107%
2013/14	340	246	72%
2014/15	340	182	54%
2015/16	340	190	56%

**3.6 Overall, is there a supply of specific deliverable sites sufficient to provide five years worth of housing, with an appropriate buffer (moved forward from later in the plan period) to ensure choice and competition in the market for land?**

- v. No. We do not object to the principle of Mildenhall as a location for sustainable growth. However, site allocation SA4, Land West of Mildenhall, proposes the delivery of 97 hectares of development for *'Mixed use to include 1300 dwellings with a local centre, a minimum of 5ha employment, schools, leisure facilities and public services'*. It is unrealistic and unachievable to deliver 1,300 houses on this site by 2031 along with the other infrastructure proposed. There is no project plan to demonstrate how the Council expects the site to be delivered. The site does not currently have planning permission nor has an application been submitted. Major developments of this type taking significant time to plan, design and deliver. The approach set out is simply overoptimistic.
  
- vi. Strategic schemes take significant time and resources to deliver. Annex 1 includes details of strategic schemes that have come forward in southern Cambridgeshire and West Suffolk in recent years. The data demonstrates how long it takes to deliver such schemes through the planning system. The quickest time from submission of an application to the occupation of homes is Cambridge University's North West campus – a time of 4 ½ years. It is worth considering in more detail the applications in West Suffolk as they will be determining any application for west of Mildenhall.
  
- vii. The North West Bury St Edmunds urban extension of 1,070 homes was identified in the St Edmundsbury Core Strategy, adopted December 2010. A hybrid application was submitted in July 2013, was subject of a resolution to grant in January 2014, and the decision issued in October 2014. Reserved Matters for strategic infrastructure were approved in February 2016. A series of applications were made to discharge pre-commencement conditions – the first of which took a year from receipt to being discharged. Altogether, it took six years from local plan adoption to start on site. No homes have yet been completed, 4 years and 2 months after the application was submitted.
  
- viii. At South East Bury St Edmunds, an urban extension of c1,200 homes was also identified in the St Edmundsbury Core Strategy, adopted December 2010. An outline application was submitted in December 2015 and was subject of a resolution to grant in January 2017. The decision has not yet been issued.
  
- ix. At North East Haverhill an application was submitted in October 2015 by Hallam. That application remains undetermined 23 months later.
  
- x. In our view a more realistic delivery trajectory for West of Mildenhall would be:
  - a. Adoption, say March 2018
  - b. Application, December 2018

- c. Resolution, June 2019
  - d. Decision notice issued March 2020
  - e. Reserved Matters submission, September 2020
  - f. RM approval, January 2021
  - g. Conditions discharged to enable start on site July 2021
  - h. Strategic infrastructure works – one year – July 2022
  - i. Start building homes, July 2023
  - j. First homes ready for occupation, July 2024
- xi. The delivery trajectory assumes that 100 homes can be delivered in year 1 at Mildenhall West. That suggests at least 2 house builders operating in tandem on the site. It also means that infrastructure needs to be installed to enable at least 2 phases to be opened up, which is likely to increase the length of time before housebuilders can begin work. In our view, the market at Mildenhall might sustain one market sale every 2 weeks per developer, around c25-30 per year. With affordable housing added, the maximum delivery from a single outlet would be c40-45 homes a year. Realistically, 25 homes might be delivered in monitoring year 2024/25. With a second housebuilder then coming on stream in 2025/26 delivery might rise to c85 dwellings in 2026/27. If the development is to be properly planned and delivered, and allowing for realistic timescales then a maximum of 500 houses could be achieved during this plan period, not 1,300 houses.
- xii. Sites at SA6(c) delivers new homes in 2018/19. Sites at SA12(a) and SA10(a) deliver new homes in 2019/20. We also consider these to be optimistic as we are unaware that applications have been submitted. In our view a more realistic delivery trajectory for these sites would be:
- a. Adoption, say March 2018
  - b. Application, December 2018
  - c. Resolution, June 2019
  - d. Decision notice issued October 2019
  - e. Reserved Matters submission, March 2020
  - f. RM approval, July 2020
  - g. Conditions discharged to enable start on site December 2020
  - h. Infrastructure works – one year – December 2021
  - i. Start building homes, December 2022
  - j. First homes ready for occupation, December 2023
- xiii. Land West of Mildenhall cannot reasonably be expected to contribute until 2024/25 at the earliest. 220 homes therefore need to be deducted from the five year supply. For years 2021/21 and 2021/22 Land west of Mildenhall should be “0”. 102 homes at

SA6(c), 120 at SA12(a) and 150 at SA10(a) should be removed from the 5 year supply. Tables 1 and 2 set out our view of five year supply based on both the Local plan's proposed housing target of 6,800 and the OAN of 7,600, using Sedgfield, a 20% buffer and the assumptions on sites set out above. In neither case can the council demonstrate a five year supply.

<b>Table 2: Five Year Supply based on OAN of 7,600</b>			
A	Total Local Plan requirement		7,600
B	Annual Local Plan requirement	A/years in plan period	380
C	Actual Completions to date		1,655
D	Required delivery to date	B*no. years since base date of plan	2,280
E	Performance relative to plan	C-D	-625
F	Basic five year requirement	B*5	1,900
G	Five year requirement including delivery to date	F+G	2,525
H	Buffer	20%*G	505
I	Total five year requirement	G+H	3,030
J	Average annual requirement	I/5	606
K	Identified supply		2,332
L	Years supply	K/J	3.8
M	Shortfall/surplus in Five years	K-I	-698

<b>Table 2: Five Year Supply based on Local Plan figure of 6,800</b>			
A	Total Local Plan requirement		6,800
B	Annual Local Plan requirement	A/years in plan period	340
C	Actual Completions to date		1,655
D	Required delivery to date	B*no. years since base date of plan	2,040
E	Performance relative to plan	C-D	-385
F	Basic five year requirement	B*5	1,700
G	Five year requirement including delivery to date	F+G	2,085
H	Buffer	20%*G	417
I	Total five year requirement	G+H	2,502
J	Average annual requirement	I/5	500
K	Identified supply		2,332
L	Years supply	K/J	4.7
M	Shortfall/surplus in Five years	K-I	-170

**Annex 1: achieved planning timelines for strategic schemes**

<b>Site</b>	<b>Local Planning Authority</b>	<b>Lead Developer</b>	<b>Date of Adopted Local Plan</b>	<b>Homes</b>	<b>Submission of application</b>	<b>Committee resolution</b>	<b>Decision notice issued</b>	<b>start on site</b>	<b>occupation of first homes</b>	<b>Submission to first occupations</b>
Darwin Green	Cambridge City	David Wilson Homes	2006	1593	Dec-07	Jul-10	Dec-13	Aug-17	Dec-18	11 years
North West Cambridge	Cambridge City & South Cambs	Cambridge University	2009	3000	Sep-11	Aug-12	Feb-13	late 13	Jul-17	4.5 years
Clay Fram, Cambridge	Cambridge	Countryside	2006	2300	Jul-07	May-08	Aug-10	Oct-11	Mar-13	5.75 years
Trumpington Meadows	Cambridge City & South Cambs	Grosvenor/Barratt	2006/7	1200	Dec-07	Jun-08	Oct-09	Nov-11	Dec-12	5 years
Northstowe	South Cambs	Gallagher	2007	1500	Dec-07	Oct-12	Apr-14	Apr-15	May-17	9.5 years
North West Bury St Edmunds	St Edmundsbury	Countryside	2010	1070	Jul-13	Jan-14	Oct-14	Apr-16	tbc	
South east Bury St Edmunds	St Edmundsbury	Pigeon	2010	1200	Dec-15	Jan-17	tbc			
North East Haverhill	St Edmundsbury	Hallam	2010	2500	Oct-15	tbc				