
Interim Statement: Five-Year Supply of Housing Land & Housing Trajectory 2018 - 2023

June 2018



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Interim Statement: Five Year Supply of Housing Land & Housing Trajectory (June 2018)

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1. Introduction

- 1.1 This housing land supply statement sets out North Norfolk District Council's residential land supply position as at 31st March 2018, it compares the current requirement for new homes in the district with the deliverable supply to establish the number of years of supply which are available.
- 1.2 In September 2018 new 2016 based household projections will be published by the Office of National Statistics. These projections are one of the key inputs into this statement and provide the basis for establishing how many homes will be required. The current evidence suggests a significant slowdown in the future rate of population, and hence housing, growth in North Norfolk and this, in turn, is likely to reduce the number of dwellings required in the district over the next five year period. Furthermore, government is currently considering responses to a recent consultation on the National Planning Policy Framework which includes a new approach to establishing housing needs and the final approach is unlikely to be clear for some time. In the interim this statement tests the adequacy of the deliverable supply against current housing requirements and also tests what the position might be in the event that government introduces a new approach to the assessment of housing needs later in the year. The Council will review this statement following publication of the new household projections in September 2018.
- 1.3 The National Planning Policy Framework seeks to ensure that the planning system delivers a flexible, responsive supply of housing development land to meet identified objectivity assessed needs. It requires that Local Planning Authorities identify, in their Local Plans and via the grant of planning permissions, sufficient specific deliverable sites to provide for the next five years of their housing requirement. As part of this, the national Planning Practice Guidance (PPG) advises that such assessments should be carried out annually, be based on up to date and sound evidence, taking into account the anticipated need and demand for new housing and consideration of the factors which are likely to influence future delivery rates. Assessments should be realistic and be made publicly available.
- 1.4 This Interim statement explains the Council's methodology for calculating the housing requirement and assessing and comparing this with the deliverable supply and provides details of all of the sites where it is considered there is a realistic prospect of development over the next five year period. It answers the following questions:
 - What is the five-year housing land requirement?
 - How much deliverable housing land is there in North Norfolk including details of individual sites?
 - How many years of deliverable housing land supply exist?

2. Context

- 2.1 During much of the 1990s and early 2000s the Council applied land use policies that constrained the opportunities for new residential development. This approach arose as a result of relatively high levels of new house building in the 1980s and a concern that if such trends were allowed to continue dwelling completions in the district would exceed the requirement (at that time treated as a target to be delivered rather than minimums to be provided) of the then adopted Norfolk Structure Plan. Consequently, the North Norfolk Local Plan, adopted in 1998, made no new housing land allocations and included policies that constrained the opportunities for new dwelling completions to locations within

the boundaries (infill development) of approximately 80 defined settlements in the district. Despite this policy of development constraint an average of 346 dwellings were built each year over this period. Most of this, in excess of 75%, occurred within the larger settlements in the District. The current evidence¹ indicates that there are high levels of both demand and need for additional homes in the district with an assessed requirement between 2016 and 2036 for approximately 8,300 new dwellings in total. The District Council has adopted a Core Strategy (2008) and a Site Allocations Development Plan (2011) providing for the planned growth between 2001 and 2023 and has commenced a review of these plans to produce a new single Local Plan which will cover the period 2016-2036. The adopted plan aims to deliver a minimum of 400 dwellings per year.

- 2.2 Over the medium to long term the demand locally for market housing has been strong, fueled largely by high levels of in-migration. In the period 2007 to around 2012 there was a slowdown in both the local and national economy and this had a significant impact on the local new build housing sector. Both dwelling completions and dwelling commencements declined over this period and have only more recently improved. Whilst the economic climate played a significant part in previous falls in construction activity, the absence of larger scale housing land allocations which were unavailable prior to adoption of the Site Allocations Development Plan in 2011 has undoubtedly limited development opportunities until recent years. For these reasons the Council considers that both land supply and market factors have influenced dwelling completion numbers in the district over the last decade or so.
- 2.3 In 2011 the Council adopted a Site Allocations Development Plan which allocated land for an additional 3,400 dwellings. These allocated sites represent an entirely new source of housing land supply that had not previously been available in the District. The Council also introduced a temporary Housing Incentive Scheme which included a range of measures designed to improve development viability and encourage the quicker delivery of development on consented sites. This scheme was introduced as a specific response to difficult economic conditions and an acknowledgement by the Council that intervention was required to deliver planned and approved development at a faster rate. This scheme remains in place until such time as the new Local Plan has been prepared.
- 2.4 New dwelling completion rates have shown some improvement in the last few years mainly as a result of larger scale developments commencing on allocated sites. In fact, new completions have exceeded the Local Plan requirement of 400 dwellings per year in each of the last four years and this appears likely to continue as the larger consented sites where development has commenced are built out.

3. Summary Findings

- 3.1 During the year commencing April 2017 to March 2018 some 546 net additional dwellings were completed in the District. Completion rates in each of the preceding three years 2014 -17 exceeded the requirement for new dwellings identified in the most up to date evidence (SHMA). Since April 2014, the base date of the latest available National Household Projections, some 1,970 dwellings have been built against an assessed requirement in the SHMA of 1,636 over the same period - a surplus of 334 units. This surplus reduces to 253 dwellings once a 5% buffer has been added to the requirement as required by the NPPF.

¹ Joint Central Strategic Housing Market Assessment 2017, ORS
National Household Forecasts 2016 (2014 base), Office for National Statistics
National Population Forecasts 2018 (2016 base), Office for National Statistics

- 3.2 In 2018 government has indicated that a new approach should be taken to the way in which future housing requirements are assessed. Where a Local Plan is more than five years old, as is the case with the North Norfolk Core Strategy, this new approach will be based on the latest available national Household Projections with a single standardized adjustment to take account of local evidence in relation to the affordability of homes. If introduced, this would result in an increase in the future requirement from a current average of 409 dwellings per year identified in the Central Norfolk Strategic Housing Market Assessment to an annual baseline requirement to deliver 538² net additional dwellings.
- 3.3 In May 2018 the 2016 based Sub National Population Projections were published by the Office for National Statistics. For North Norfolk these show a significant slowdown in the projected rate of growth compared to the earlier 2014 based projection. These population projections will be reflected in the household projections which are due to be published in September 2018 which are highly likely to show a similar reduction in the projected number of households, and hence the number dwellings required in the District. As these figures will not be available until September the Council will continue to use the 2014 based projections as these represent the most up to date published figures that are available.
- 3.4 Taking account of the planning permissions which have been granted, the allocated development sites in the Site Allocations Development Plan and making an allowance for windfall developments there is a total assessed deliverable supply of land suitable for some 2,837 new homes (See **Appendix A** – Housing Supply Schedule 2018-2023).
- 3.5 **This equates to 6.6 years land supply when compared to the current requirement to deliver 429³ dwellings per year.**
- 3.6 In the event that government introduces the new standard housing needs methodology later in the year the housing requirement in the District will increase to 565 dwellings (538 plus 5% buffer). At this higher requirement there would be 5.02 year's land supply in North Norfolk.

4. Methodology

- 4.1 Local Authorities are required to maintain a five year supply of deliverable housing land by the National Planning Policy Framework (NPPF). At the time of preparing this Interim Statement the published NPPF was the March 2012 version but this is currently subject to a process of updating and amendment. Consultation versions of the revised Framework and associated guidance (NPG) have been published and following the consultation government has indicated that the new document will be published over the summer of 2018. The new NPPF proposes some significant changes to the assessment of housing need and the approach to be taken to five year land supply calculations.
- 4.2 The Council will keep this Statement under review and publish a revised statement in the event that further changes are introduced.
- 4.3 The Council undertakes four stages in the process of preparing this statement:
- STAGE 1 - Identifying the five year period;
 - STAGE 2 - Identify the requirement - the scale of housing provision to be delivered including addressing any historical shortfalls and applying buffers to extend choice;

² Based on 2014 National Household Projections with 2017 based affordability ratio uplift

³ 409 dwellings per year identified in Central Norfolk SHMA 2017 plus 5% buffer required by NPPF.

- STAGE 3 - Identify the housing land supply - sites with a realistic prospect of being built over the applicable five year period;
- STAGE 4 - Calculating the years of supply that are deliverable.

Stage 1: Identifying the Five Year Period

- 4.4 These statements are prepared annually and look forwards over a five year period commencing on the 1st of April of the current year. The five year period covered by this statement is therefore the 1st April 2018 to the 31st March 2023.

Stage 2: The Requirement - Identifying the scale of housing provision to be delivered

- 4.5 The housing requirement for each Planning Authority area is established via the preparation of Local Plans. These include targets for the minimum number of dwellings to be delivered over the period covered by the plan and for land supply purposes are typically expressed as annual average requirements. North Norfolk's adopted Core Strategy requires the delivery of a minimum of **400** dwellings per year. Where a Local Plan is up to date the starting point for establishing the requirement is the adopted Local Plan. The Council is currently working on a replacement single Local Plan which amongst other matters will establish a new housing target for the District. However, this new plan is insufficiently advanced in its preparation to be taken into account in the preparation of this statement.
- 4.6 During 2016 the Council, in partnership with adjoining authorities, commissioned Opinion Research Services, (ORS) to identify the functional Housing Market Area and prepare a Strategic Housing Market Assessment (SHMA) in order to establish the up-to-date Objectively Assessed Needs (OAN) for housing across the Central Norfolk Housing Market Area and within each of the District Council constituent areas. In 2017 the SHMA was updated and as per the required guidance was based on the most up to date available 2014 National Household Projections. Compared to the Core Strategy the SHMA identifies a slightly higher annual requirement of **409** dwellings per annum and this baseline figure was used in the production of last year's 2016 Five Year Land Supply Statement.
- 4.7 Although the Council considers that the 2017 SHMA represents the most up to date local evidence in relation to housing need the methodology used in its preparation does not accord with the more recent NPPF (consultation draft) and in particular does not use the proposed new standard national methodology for the assessment of housing need. Paragraph 74 of the emerging NPPF requires that where a strategic plan is more than five years old, as is the case with the North Norfolk Core Strategy, the *requirement* for five year land supply purposes should be based on an areas local housing need, calculated in accordance with the proposed new standard national methodology, as such a figure is more likely to reflect recent evidence including the latest available National Household Projections. The national methodology currently uses the same 2014 Household Projections as the published SHMA but produces a significantly higher annual requirement of **538** dwellings per annum in large part due to the addition of a significant uplift⁴ to the ONS demographic growth projections to assist with dwelling affordability. The Council is concerned that the size of this uplift, which equates to around a 25% increase in the annual housing requirement in the District, will be difficult to deliver on a consistent basis not least because the housing market locally does not appear to have the current capacity to deliver this scale of growth on a consistent basis. This issue will be considered further as part of the preparation of the new Local Plan but until this Plan has been adopted and a new housing target has been agreed the Council proposes to use a baseline requirement of 409 dwellings per year for land

⁴ The national housing needs assessment methodology requires uplifts to be applied to demographic growth projections as a measure to improve dwelling affordability. The scale of such uplifts are determined by a set formula which compares house prices locally with incomes (affordability ratio).

supply purposes. As this figure is derived from the 2014 Household Projections the Council considers it appropriate to backdate the current requirement to 2014 to ensure that any surpluses or shortfalls which may have arisen since this time are properly accounted for.

4.8 The NPPF also requires that Local Planning Authorities apply an additional buffer to their requirement of at least 5% to ensure choice and competition in the market for land. Where an authority has failed to provide 85% of the requirement over the preceding three years this buffer should be increased to 20%. **Table 1** below compares dwelling completions in the district since 2014 (the base date for the current national household projections from which current housing needs are derived) with the dwelling requirement over the period since 2014. During this time 100% of the baseline housing requirement of 409 dwellings per annum has been provided and consequently the Council considers it appropriate to apply a 5% buffer.

4.9 As part of the process of preparing new Local Plans in the County the Norfolk Planning Authorities have collectively prepared a Norfolk Strategic Planning Framework. This includes a number of formal agreements including agreements relating to how the partner authorities will ensure that sufficient homes are provided across the County as a whole. It has been agreed as part of this process that North Norfolk District Council should address housing needs arising within the district itself and it need not make extra provision arising from areas outside of its administrative boundaries. The Strategic Framework is subject to a process of on-going review and will need to consider the suggested revisions to the NPPF. At this stage it is not anticipated that this will necessitate the delivery of further dwellings in North Norfolk to address shortages which may arise in the wider Housing Market Area or the County as a whole.

Table 1 - Dwelling Completions compared to Requirement 2014-2018

Year	Baseline requirement*	Baseline plus 5% buffer**	Additions required under Duty to Co-operate	Completions	Surplus	% of requirement delivered over previous three years
2014/18	1,636	1,717	0	1,970	253	100%

*409 dwellings per year for the four year period 2014-2018

** Size of buffer determined by % of requirement delivered over previous three years (exceeds 85% so a 5% buffer added).

Stage 3: Site Identification (supply)

4.10 The NPPF sets out the requirements for sites which may be included within the five year supply. It states that in order for a site to be included in the five year supply it must be deliverable⁵. This is defined as:

- **Available** - the site should be *available* for development now.
- **Suitable** – the site should offer a *suitable* location for development now.
- **Achievable** – there should be a *realistic prospect* that housing will be delivered on the site within five years.

4.11 Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires unless evidence suggests that such sites are unlikely to deliver within the applicable

⁵ As defined in Annex 2 of the NPPF 2018 - Glossary

period. Sites with outline planning permission, permission in principle and those allocated for development or identified in brownfield registers should only be considered deliverable where there is clear evidence to justify their inclusion.

4.12 In this assessment the Council has included homes from three main sources of supply in the next five years. Each source, and in the case of larger sites - each site, has been tested to ensure that there is a realistic prospect of delivery. The Council considers that sites with planning permission, those which are allocated in the local plan and those identified on the brownfield register are *suitable* and *available* for development. The three potential sources of deliverable housing supply in the district over the next five years are:

- **Large sites** – These include all sites which are capable of delivering ten or more dwellings including those with planning permission, those allocated in the adopted Local Plan, and other potential sources. Full details of each site and the conclusions that the Council has reached in relation to delivery are provided in the Supply Schedule – **Appendix A**.
- **Small sites with planning permission** - On small sites it is not practicable to appraise the delivery of each site individually, due in part to the number of small scale sites which have the benefit of planning permission. The evidence shows that in excess of 90% of small site planning permissions are completed within five years of planning permission being granted. The Council therefore applies a 10% lapse rate to this source of future housing.
- **Windfall development** – This is an allowance for sites which do not yet have planning permission and are not specifically identified for development in the Local Plan but nevertheless have a realistic prospect of providing new homes over the period. The approach taken in relation to windfall is explain further in **Appendix B**.

4.13 In preparing this statement the Council has been careful to ensure that the assessment made in relation to future delivery rates is as realistic as possible. Even so it must be acknowledged that rates of development in future years are influenced by many factors some of which are outside of the direct control of the planning authority.

Stage 4: Calculating the years of supply

4.14 The table below shows how the overall land supply position in the District is calculated.

The land supply position as at 1st April 2018 is 6.6 years calculated as follows:

North Norfolk District Council Five Year Housing Supply		
a	Housing Need Requirement 2014-2018 (4 years x 409dpa)	1,636
b	Completions 2014-2018	1,970
c	Surplus 2014-2018 (b) – (a)	334
d	5 year baseline requirement 2018 - 2023 (409 x 5)	2,045
e	Additions required under duty to co-operate	0
f	Adjustment to account for surplus/shortfall between 2014-2018	0*
g	Additions required to address NPPF buffer (d)+(e)+(f) x 5%	102
h	Total Five Year Requirement 2018-2023	2,147
i	Annual Requirement over next five years (h/5)	429
j	Total deliverable supply over five years	2,837

	(See Appendix A)	
k	Excess in supply (j - h)	690
l	Supply in years (j/i)	6.6

*Note - Current surplus of 334 is **not** deducted from future requirement.

5. Conclusion

5.1 The latest available evidence concludes that around 409 dwellings should be built each year to address Objectively Assessed Needs. This figure has been exceeded in recent years and there are no current shortfalls which need to be addressed. There are around 2,837 dwellings which the Council considers have a realistic prospect of being built over the next five years. This equates to a **6.6** year land supply.

6. Monitoring the five year supply

6.1 The Council will monitor the five year supply of deliverable sites on an annual basis. This statement will be updated regularly to take account of any significant changes. New planning permissions and completions are recorded on a continuous basis. Dwelling completions are recorded annually with the results published in the Housing Land Availability Statement published each year.

7. Information Sources

7.1 Housing related data is monitored annually by the Planning Authority for the period commencing the 1st of April and ending on the 31st of March each year. Data is published as follows:

- **Housing and Employment Land Availability Assessment (HELAA)** (previously known as the Strategic Housing Land Availability Assessment). This study identifies all reasonable potential sources of dwelling completions in the district and makes an assessment of the suitability of sites, their availability, and when development could be delivered in the event of such sites being released for housing. Whilst these studies identify a large amount of theoretical capacity they are not policy documents and do not reach any conclusions in relation to whether this capacity should be made available for development through allocation in a development plan document or by the grant of planning permission.
- **Five Year Housing Land Supply Statements** (this document) – these have been published by the Council every year since 2007 and relate the amount of housing that has been provided and is expected to be provided over the next 5 years, with the levels of required growth. In addition to dwelling completions and planning permissions these statements also include an assessment of when identified development sites will be built.
- **Housing Land Availability (HLA)** – published by the Council each year since 1995 these provide a summary of the number of dwellings completed in each Parish of the District. These statements are available on the Council's web site.

7.2 Whilst these are prepared by the District Council they are the result of discussions with landowners, developers, Housing Associations and others with an interest in housing development in North Norfolk. The HELAA in particular is primarily derived from information supplied by public and private sector housing providers.

Allocation
With permission
Small Site
Windfall projections

Appendix A: Schedule of sites and projected delivery of sites

The table below provides details of all those sites where the Council considers there is a reasonable prospect of development being delivered in the next five years.

It includes the three main sources of supply identified in the land supply statement, namely, large sites which are either allocated or have planning permission for development, sites of less than 10 dwellings which already have planning permission and an allowance for windfall developments in accordance with Appendix 2. The site reference numbers are either those given to the site in the North Norfolk Site Allocations Plan or are the planning application reference. Both the Allocations Plan and details of each planning application, including location plans, are available on the Council's web site. Many of the sites included within this schedule are already under construction and some of the approved dwellings have been completed. Precise delivery rates of development will vary year on year and will be kept under review via production of annual statements of land supply.

Site reference	Location	Planning Status					Build Information			Assessment of delivery						Comments	
		Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2018	Left to be built (inc under construction)	Under Construction	Total dwellings in 5 year supply	2018/19	2019/20	2020/21	2021/22	2022/23		Beyond March 2023
ALD01	Garage site / Pipits Meadow Aldborough	8	2				0	8		0						8	Site in multiple ownerships, development would require relocation of existing businesses. Site is not considered to be available now so development unlikely in next five years.
BACT03	Land adjacent to Beach Road, Bacton	20	20				0	20		0						20	Pre-application discussions were held with the land owner in 2015 who intended to secure a developer and make an application under the Housing Incentive Scheme. Whilst the site is currently available, no planning application has been made and there is insufficient evidence of delivery at this stage to include within the five year supply.
PF/14/0859	Land at Hall Close, Bodham, Holt, NR25 6PW					16		16		16	16						Under construction
PF/15/1221	Land off Priory Crescent and Walsingham Road, Binham					28		28		28	5	18	5				Commenced 26/02/2018
PF/88/1996	Land at Hall Street, Briston					63	45	22		22	8	7	3	4			Site not previously included. Residential Development Land at Hall Street. 16/05/2018. Variation of condition to 88/1996. New Application 17/1265. Reduction in numbers from 67 to 64. 67-4 = 63. New application for 19 units. Therefore 5 units not counted. 19 remaining under application 17/1265.
BRI02	Land West of Astley Primary School, Briston	30					0	30		0						30	Although allocated this site is currently unavailable and is considered unlikely to deliver development before 2021. Not included in 5yr supply.
BRI24 15/1746	Land at rear of Holly House, Briston	10				12	0	12		12		6	6				The site is allocated and is available for development now . A full planning application by a house builder for 12 units has been granted. Site preparation works have commenced.
CAT01	Land off Lea Road, Catfield	15					0	15		0						15	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints but owner indicates not likely to come to market before 2020.
COR01	Land between Norwich Road & Adams Lane, Corpusty	18	18				0	18		0						18	Pre-application discussion with house builder during 2016. Application not yet made so delivery remains uncertain.

Site reference	Location	Planning Status					Build Information			Assessment of delivery						Comments	
		Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2018	Left to be built (inc under construction)	Under Construction	Total dwellings in 5 year supply	2018/19	2019/20	2020/21	2021/22	2022/23		Beyond March 2023
09/0826	Burnt Hills, Cromer					13		13	1	8		2	2	2	2	5	Site has planning permission. Owner indicates small number of completions over five year period dependent on market conditions.
19941720 19961424 19960965 19960292 19951110	Central Road, Cromer					99	68	31		0						31	31 remaining units as part of base consent for 106 dwellings. Delivery would require relocation of existing commercial use .No sign of recent activity so not included with five year supply.
22.002 19741952	Cromwell Road, Cromer					20	10	10	1	2	1		1			8	Building single plots at intervals. Due to slow build rates it is assumed that only 2 of the remaining plots will be completed within 5 years although the site could be completed over this period.
19901666	Highview, Cromer					41	21	20		0						20	No sign of recent activity. Although some or all of these dwellings could be built no allowance has been made for dwellings within next five years as it is not clear when development will recommence.
C01	Land adjacent to East Coast Motors, Beach Road, Cromer	40						0		0						40	Owner indicates existing use to be retained in the short term but site likely to become available towards end of plan period.
C04 15/0572 17/0751	Land at rear of Sutherland House, Overstrand Road, Cromer	60	68		68			68		68			22	22	24		Site is owned by local development company, is allocated for development and has full planning permission. Site works commenced early 2018
C07 13/0451 14/0863	Land at Jubilee Lane / Cromer High Station, Cromer	40				9	9	31		0						31	Site is allocated and has recently been marketed by land owner. LPA has given pre app advise to a number of prospective purchasers but no planning application has been made to-date. Insufficient evidence of delivery at this stage to include within five year supply (eight dwellings have been completed on part of the site).
C14 13/0247	Land West of Roughton Road, Cromer	160				145	77	68	21	68	30	30	8				Site has full planning permission and is under construction, a substantial number of units have been started. Developer (Norfolk Homes) indicates that dependent on sales rates the site is likely to be nearing completion within five years.
15/1223	Land off Rectory Road and Holt Road, Edgefield					22		22		22		10	12				Discharge of conditions application 17/1286 not yet determined. Commencement programmed for late 2018/
15/1461	Land off Eagle Road, Erpingham					24		24		24		10	14				Site visit May 2018, site fenced off. Nothing happening on site yet.
PF/15/1587	Land to the south of, Eagle Road, Erpingham					10		10		0						10	Although the site has planning permission commencement dates are unclear.
15/0389	The Rowans, (Off Salmons Way) Fakenham					30	17	13	7	13	13						Site visit April 18. Currently under construction Apr 2018.

Site reference	Location	Planning Status					Build Information			Assessment of delivery						Comments	
		Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2018	Left to be built (inc under construction)	Under Construction	Total dwellings in 5 year supply	2018/19	2019/20	2020/21	2021/22	2022/23		Beyond March 2023
F01 950 Units 23.75 ha	Land North of Rudham Stile Lane, Fakenham. Remaining Allocation	768		950				768		120				60	60	64	These three sites all lie within the F01 allocation in the Site Allocations Development Plan. Trinity college have applied for outline planning permission for 950 dwellings and will market the site once consent is in place. 101 dwellings are under construction on the Places for People site. The Picken site has outline permission for 78 units and is under option to a national housebuilder who intends to make a reserved matters application in July 2017 with the site completed well within the five year period. Outline application for 950 units PO/17/0680 pending
F01 (Picken)	Land North of Rudham Stile Lane, Fakenham				78		78		78		30	30	18				
F01 (Places for People) PF/15/1167	Land North of Rudham Stile Lane, Fakenham					104	104		104		31	32	41				
F05 10/0109 08/1324	Land between Holt Road & Greenway Lane, Fakenham	60					24	36		14	14					22	Part of the site completed (24 units). Development of remainder will require relocation of existing uses and land assembly, therefore development considered unlikely in next five years. Site visit April 2018 - Block of flats 14 under construction.
PF/16/1462	Land on the west side of, Barons Hall Lane, Fakenham					10	10			10	10						The site has full planning permission, is under construction and expected to be completed in 2018/19
19892604 20001459 15/0389	Smiths Lane, Fakenham					109	90	13	7	13	13						.Site visit April 18 - 17 complete & 7 under construction
HAP07	Land West of Whimpwell Street, Happisburgh	14						14		0						14	Small site in private (mixed) ownership which may delay delivery, no current developer interest. No exceptional development costs or infrastructure constraints but no evidence of likely delivery within five year period.
PM/16/1512) PM/15/1578 PM16/1511	Land South of Cromer Road and North/East of Grove Lane, Holt					150		125	10	125	30	30	30	30	5		Site has full planning permission and is owned by Hopkins Homes. Development commenced 2017 and is expected to be complete by 2021/22. Site visit April 18, Sites under development.
H01 PM/15/0804	Land West of Woodfield Road, Holt	100			85	83		83		83		30	30	23			Reserved Matters Planning Approval has been granted to Norfolk homes who indicate commencement 2017/18.
H09 PM/16/1204	Land at Heath Farm / Hempstead Road, Holt	200			215	213		188	5	188	32	46	59	38	13		Site has full Planning Permission and development has commenced. Projected delivery rates confirmed by Lovell Homes
H12	Land off Hempstead Road	70						70		60			30	30		10	Site owned by regional house builder and included within construction program in later years of current plan period. Developer indicates may be delivered at earlier date. Reptile relocation works on going. Application for 52 Dwellings, application 17/1803 Pending @ 29/05/2018.

Site reference	Location	Planning Status					Build Information			Assessment of delivery						Comments	
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HOR06 11/1505	Land East of Abbot Road, Horning	26		26				26		0						26	Outline planning application awaiting decision pending upgrades to local sewage treatment works. Upgrades have been completed and effectiveness is being monitored. Delivery within five years is probable but insufficient evidence at this stage to include within five year supply.
SN01 14/1249 18/0334 - Pending	Land at junction of Holt Road & Kettlestone Road, Little Snoring	20			20			20		20			10	10			Outline planning permission granted. Site is available and suitable for development and has been purchased by house builder who is preparing full application. Reserved Matters application received 18/0334 - Pending
SN05	Land adjacent to Little Snoring Primary School, Kettlestone Road, Little Snoring	10						10		0						10	This site is allocated and is suitable for development but there has been insufficient recent interest to include within five year supply.
LUD01	Land South of School Road, Ludham	15						15		0						15	Full application made in 2015 but withdrawn by applicant.
LUD06	Land at Eastern end of Grange Close, Ludham	10						10		0						10	No current developer interest. No exceptional development costs or infrastructure constraints but no evidence of likely delivery within five year period.
PM/15/0170	Bowling Green, Grove Road, Melton Constable					38		38		0						38	Site has been marketed with planning permission but little interest so not included within five year supply at this stage.
86/2010 88/2528	Melton Constable Hall, Melton Constable					32	9	23		0						23	Extant planning permission but no recent progress. No units included within five year supply.
MUN06 PF/15/153 4	Land at Grange Cottage / Water Lane, Mundesley	40				44	13	31	12	31	15	16					Site has planning permission and development commenced during 2017. Completion expected within three years.
NW01 (part of site) PF/13/0866	Land at Norwich Road / Nursery Drive, North Walsham	176				176	132	44	25	44	40	4					Development has started. Developer (Hopkins Homes) confirms delivery of between 25 -40 units per year depending on release of affordable units and sales rates of market units. Site is programmed for completion in 2019/20 but may take slightly longer to complete depending on market conditions.
NW01 (Toft Land) PF/15/1010	Land at Norwich Road / Nursery Drive, North Walsham	100	100			100	19	81		81	30	40	11				Site has full planning permission for 100 dwellings and development commenced early 2017. Developer (Persimmon Homes) confirm approx 40 completions per year.
NW01 (remainder of allocation)	Land at Norwich Road / Nursery Drive, North Walsham	124						124		0						124	Remainder of NW01 allocation not subject to any current planning applications so not included within current five year land supply period.
17/0579	29 New Road, North Walsham					44		44		44			15	15	14		45 retirement living apartments for the elderly including communal facilities, landscaping, car parking and ancillary development. Under construction

Site reference	Location	Planning Status					Build Information			Assessment of delivery						Comments	
		Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2018	Left to be built (inc under construction)	Under Construction	Total dwellings in 5 year supply	2018/19	2019/20	2020/21	2021/22	2022/23		Beyond March 2023
NW25 17/1951 Pending	Land off Laundry Loke, North Walsham	10	30					30		30		15	15				Housing Association investigating acquisition of adjacent land to increase the size of the site and deliver approx 45 dwellings. Decision on full planning application pending
NW28a	North Walsham Football Club, North Walsham	60						60		0						60	Dependent upon relocation of football club (relocation costs), with possible highways issues. Some development on this site within the next five years is possible but considered unlikely given the need to relocate the football club to an alternative site.
OVS03 18/0179	Land at rear of 36 Bracken Avenue, Overstrand	6				4		6		4		2	2			2	Has full planning permission, conditions discharged. Commencement expected during 2018
PM/14/085 4 75.001	Hillingdon Park, Overstrand					35	25	10	1	10	5	5					Ten plots remaining from earlier development scheme have now secured reserved matters approval and are under construction.
OVS04 PM/15/1714	Land South of Mundesley Road, Overstrand	35				42	31	11	5	11	11						Site has full planning permission and Hopkins Homes have commenced development which is expected to be complete by 2019.
ROU03/10 14/0986	Land at Back Lane, Roughton	30			30			30		0						30	Outline application awaiting decision. Insufficient certainty to include site within five year supply at this stage.
10/0295	39 - 52 Renwick Park, West Runton					10	1	9		5	1	1	1	1	1	4	Very slow delivery rates with plots built at intervals.
SH04	Land adjoining Seaview Crescent, Sheringham	45						45		0						45	Greenfield site owned by local developer, but no recent interest shown so not currently included within five year supply..
SH06 PM/16/1725	Land rear of Sheringham House, Sheringham	70			62			62		62		30	30	2			Site is owned by local development company, is allocated for development, development is viable and owner confirms that subject to grant of planning permission would be delivered within three years. Full planning permission has been granted
SH14 15/0114	Land at Holway Road, opposite Hazel Avenue, Sheringham	50				52		52		52		10	32	10			Site has full planning permission for 52 units. Developer advises commencement in 2018. Development has commenced

Site reference	Location	Planning Status					Build Information			Assessment of delivery						Comments	
		Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2018	Left to be built (inc under construction)	Under Construction	Total dwellings in 5 year supply	2018/19	2019/20	2020/21	2021/22	2022/23		Beyond March 2023
PF/14/0644	Land at Seaview Crescent, Sheringham					11	2	9	2	9	3	3	3				Full planning permission for a net gain of 3 units. Site had planning permission for 8 dwellings before grant of latest permission for 11. 8 dwellings included in small sites. Applicant intends to complete revised scheme over next 3-5 years.
19770968	The Esplanade, Sheringham					55	24	31		0					31	Implemented permission with no evidence of recent activity. Although some or all of these dwellings could be built no allowance has been	
15/0001 17/1774	Former Hilbre School, Sheringham				40	32	6	26	7	26	10	16				Site has full planning permission and is under construction.	
17/0468	Formerly The Shannoeks, 1 High Street, Sheringham					10		10		10			5	5		Demolition of existing hotel and erection of mixed use building comprising	
18/0588 Pending	11 Beaumaris Court, 13-15 South Street, Sheringham			30				30		30		10	10	10		Planning permission ref: PF/16/1200 (Demolition of dwelling and hotel and erection of 30 retirement apartments. Development is under construction)	
20071919 17/1434	Old Baker's Yard, High Street, Stalham					14	5	9		9		9				Site has full planning permission and remaining 10 units (phase 2) are under construction and expected to be completed during	
SOU02	Land West of Long Lane, Southrepps	10						10		0					10	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints	
SOU07	Land North of Thorpe Road, Southrepps	12						12		0					12	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints	
WAL01	Land East of Wells Road, Walsingham	24						24		0					24	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints but site	
17/0729	RAF West Raynham, Massingham Road, West Raynham			94				94		94			35	35	24	Resolution to grant full planning permission. Commencement expected shortly	
WEY03 PF/15/109	Land at The Street, opposite The Maltings Hotel, Weybourne	4	7			7		7	7	7	7					Planning Permission Granted PF/15/1095. Development commenced early 2017.	
WEY09	Land South of Beck Close, Weybourne	4						4		0					4	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints	
Total from small sites (under 10 dwellings which already have planning permission)								748		640	128	128	128	128	128	37	748 units with planning permission minus 37 not built within five year period minus 10% lapse rate.
Windfall		N/a								540	0	135	135	135	135		Based on the delivery of a 135 units per year as windfall development commencing in year 2. See Appendix B for detailed
										283	406	660	716	647	408		

Appendix B - Specific Approach to Windfall

- B1.1 Windfall sites are those which are not allocated for development in the Local Plan and do not yet have planning permission. Local Authorities may make an allowance for development coming forward as windfall within the five year period. The NPPF states that a windfall allowance may be justified in the five year supply if a local planning authority has compelling evidence to justify its inclusion. Any windfall allowance should be realistic having regard to the Housing Land Availability Assessments, historic windfall delivery rates and expected future trends.
- B1.2 Windfall development has been a consistent and substantial contributor towards housing supply in North Norfolk for many years. In fact, before 2013 all development in the District took place on windfall sites. Since the adoption of the Site Allocation Development Plan Document in 2011 windfall has continued to form a consistent part of development coming forward, providing an average of 271 dpa, between 2011-2018.
- B1.3 In general it is widely assumed that it is likely to be the case that windfall represents a diminishing source of future housing supply. This is because once a site has been developed it is unlikely to come forwards again and there is argued to be a limited supply of suitable, policy compliant, windfall sites. There is no evidence that this is yet the case in North Norfolk. In considering if it is appropriate to include a windfall allowance and the size of such allowance the Council has adopted the following approach.
- **Stage 1** : Considering previous delivery rates for windfall developments
 - **Stage 2** : Identifying the potential future sources of windfall supply and quantifying their realistic contribution.
 - **Stage 3** : Applying a discount to ensure potential contributions are not over –estimated.
 - **Stage 4** : Deducting the allowance for year one of the five year period to allow for potential delays in delivery.
- B1.4 The result is a windfall allowance over the next five years of 540 dwellings. This equates to an average of 108 dwellings per year compared to the 271 per year which have historically been delivered.
- B1.5 This statement considers five key sources of windfall developments in the district:
- **Infill developments, redevelopment of previously developed sites, changes of use** - In 2008 the Council adopted the North Norfolk Core Strategy. This identified those settlements in the District where infill development would be permitted. Whilst it reduced the number of such settlements from 77 settlements (as identified in the Local Plan 1998) to 26, these 26 retained settlements included all of the larger villages and all 7 of the market towns in the District which had collectively been delivering around 80% of new housing supply. In essence the ‘removed’ settlements had been making very little contribution to windfall totals. Since this date infill and redevelopment has continued to provide a significant source of new homes in the District. Between 2011 and 2018, approximately 1,250 dwellings can be attributed to infill and redevelopment from windfall in the 26 service towns and villages. **This equates to approximately an annual delivery rate of 180 dwellings.**
 - **Rural exceptions proposals** - NNDC is committed to delivering affordable housing on rural exception sites. Policy HO3 of the Core Strategy supports such development and adopts a flexible

but permissive approach across the District. Through the application of this policy a total 256 dwellings on 25 schemes have been provided since 2001/02 as detailed in Appendix 2, table 3. Accepting that these sites do not have planning permission and there is no cast iron guarantee that they will be developed **a conservative assumption is made of just 10 dwellings per annum.**

- **Rural Building Conversions** – This source includes planning permission for conversion of rural buildings, removal of holiday occupancy only conditions on holiday lets and permitted development rights allowing agricultural buildings to be converted to dwelling houses without the need for planning permission (Part 3, Class Q). The conversion of rural buildings to alternative uses has been a consistent feature of adopted planning policies for many years. The adopted Core Strategy includes a permissive approach to residential conversion in some parts of the District, with a presumption in favour of commercial uses including holiday accommodation in the remainder. Following publication of the NPPF the Council amended this adopted approach to allow for residential conversion throughout the District irrespective of location and to allow for the removal of holiday only restrictions in some circumstances.

B1.6 Research undertaken as part of the preparation of the Core Strategy suggested that at that time there were in excess of 500 converted units of holiday accommodation and as many as 1,500 -2,000 suitable buildings which had not been converted. It is acknowledged that this is a diminishing source of supply and that not all barns will be converted nor all holiday occupancy conditions removed, and for these reasons the Council has only included a modest allowance from this source. Alongside this, changes to national policy for agricultural conversions have been in place since April 2014, the numbers of applications for prior approval of these types of development are low at present.

B1.7 All of this combined has resulted in permissions for 243 new conversions and the removal of holiday only conditions on a further 132 properties over past five years. **It is assumed that 25 dwellings per annum**, approximately 56% of the recent delivery rate will come from this source.

Occasional large departures from policy

Occasionally unexpected large scale developments may come forward such as the permission for 153 dwellings at Gresham School, Holt (approved in 2015) or the 90 dwellings recently granted permission at West Raynham Airbase. The Council takes the view that whilst such schemes may well occur in future years their delivery has the potential to distort the historical supply statistics and should not be relied upon. Consequently, **no allowance is made from this source.**

B1.8 The historical trend is cited as evidence that windfall has contributed substantial growth over a sustained period, however the Councils approach is to identify the main sources of windfall in North Norfolk and answer the question – is there compelling evidence that these sources are likely to continue in the future and if so how much development are they likely to yield? In short, the Council has looked both backwards (considered the trend) and forwards (assessed the future sources of supply) in arriving at a windfall allowance.

B1.9 The Council recognises that relying on historical trends alone is not sufficient to comply with the ‘compelling evidence’ test required in paragraph 71 of the National Planning Policy Framework. Previous delivery rates of windfall development do not, in themselves, provide compelling evidence that this source will continue to provide homes in future years. A wide range of factors will influence actual rates of future delivery including prevailing local and national planning policies, market conditions, developer confidence, availability of suitable sites, and so on. Nevertheless, the Council considers that windfall will

continue to be a reliable source of a substantial number of dwellings in the next five years and for the remaining plan period and adopts a realistic but cautious approach in the Housing Trajectory to this source of supply.

B1.10 This approach was considered at the Sculthorpe appeal hearing⁶ where the inspector stated that *‘while windfall rates have varied, there has been a consistent annual supply over the past years and considered there to be a reasonable prospect of 4 years of windfall housing delivery, amounting to 540 dwellings coming forward over the remaining period’*.

Conclusion

B1.11 In order to provide a cautious approach to estimating future supply the following allowances for each source of windfall are made:

1. Infill and redevelopment = 100 dwellings per annum;
2. Conversion of buildings and removal of restrictive conditions = 10 dwellings per annum;
3. Rural exceptions developments (where sites are not yet identified) = 10 dwellings per annum;
4. Permitted development (where not time constrained) = 15 dwellings per annum.

This equates to a total of 135 dwellings per annum, In comparison the average historical position of 256 between 2010 – 2017. The allowance is only applied to the last four years of the five year period to allow for potential lags in implementation.