
Statement of Housing Land Supply & Housing Trajectory

April 2016 Final



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1. Introduction

1.1 The five year housing land supply statement sets out North Norfolk District Council's residential land supply position as at 31st March 2016, and considers the likelihood of that supply constituting a five year supply of housing land.

1.2 The National Planning Policy Framework (NPPF) seeks to ensure that the planning system delivers a flexible, responsive supply of housing development land to meet the identified objectivity assessed needs. It requires that Local Planning Authorities identify sufficient specific deliverable¹ sites to deliver the next five years of housing provision. As part of this, the national Planning Practice Guidance, PPG² advises that such assessments should be carried out annually, be based on up to date and sound evidence, taking into the account the anticipated trajectory of housing delivery, consideration of associated risks and past delivery. Assessments should be realistic and be made publicly available.

1.3 This statement is presented in two parts:

Part one explains the Council's methodology for calculating housing 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?
- How many years of housing land supply exist?

1.4 The second part is a Housing Trajectory illustrating development rates since 2012 and projecting delivery over the next five years.

1.5 **Following a robust and conservative approach the Statement concludes that the District currently has sufficient deliverable housing supply for the next 5.6 years.**

¹ To be considered deliverable sites should be available now, they should offer a suitable location for development now, and 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.

² PPG paragraph 33 Reference 3-033-20150327

2 Part A – Five Year Land Supply

- 2.1 Local Authorities are required to maintain a five year supply of deliverable housing land by the National Planning Policy Framework (NPPF). The NPPF was published on 27th March 2012 and updated previous guidance on the preparation of a five year housing land supply.
- 2.2 The NPPF at paragraph 47 sets out the expectations on maintaining a five year supply for local Authorities. In addition to being able to demonstrate five years' worth of housing against the adopted housing requirements, it also requires an additional buffer of 5% of the housing supply. The NPPF states that this is to ensure choice and competition in the market for land. However, where Local Authorities have persistently under delivered housing against their targets, the buffer should be increased to 20%.

Methodology

- 2.3 The Council undertakes four stages in the process of determining supply:
- STAGE 1 - Identifying the five year period;
 - STAGE 2 - Identify the scale of housing provision to be delivered including addressing historical shortfalls and applying buffers to extend choice;
 - STAGE 3 - Identify the housing land supply - sites with potential/reasonable prospect of being built over the 5 year period;
 - STAGE 4 – Calculating the years of supply that is deliverable.

Stage 1 - Identifying the Five Year Period

- 2.4 The five year period covered by this statement is 1st April 2016 to the 31st March 2021.

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

- 2.5 Councils are required to meet all objectively assessed need, OAN for housing in their areas. The national Planning Practice Guidance, PPG states that the housing requirement figures in an adopted Local Plan³ should be used as the starting point for calculating the five year supply unless significant new evidence comes forward:

Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, UNLESS significant new evidence comes to light....Where evidence in the Local Plan has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered....⁴

³ SS3 of the adopted Core Strategy identified at least 8,000 dwellings to be built between 2001 & 2021, an annual requirement of 400 dwellings.

⁴ National Planning Practice Guidance Paragraph 030 Ref ID 3-030-20140306

- 2.6 The Council is currently working on a replacement Single Local Plan and 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 (ORN) for housing across the Central Norfolk Housing Market Area. This represents the most up-to-date and robust housing figure for the District and updates the requirements as set out within the Core Strategy (adopted 2008), which was based on the now revoked Regional Spatial Strategy.
- 2.7 The joint Central Norfolk Strategic Housing Market Assessment (published January 2016) identifies an Objectively Assessed Need of 420 dwellings per annum between 2012 and 2036 in North Norfolk.
- 2.8 The Council considers that the SHMA represents the most up to date evidence in relation to housing need and that the figure of 420 dwellings per year should be used as the basis for five year land supply statements pending the production of the new Local Plan. This approach was clarified through the recent appeal decision on land south of Lodge Close, Holt by Gladman Developments Limited (APP/Y2620/W/14/3000517). In his report the Inspector clarified the Council's position regarding the 5YHLS calculation and use of the updated evidence contained in the Central Norfolk SHMA.

In view of my conclusions in relation to the housing target in the Council's adopted plans (400 dpa) and the work undertaken to determine an OAN, I consider the ORS figure of 420 dpa represents the best available albeit minimum level of annual provision which should be used when assessing the current housing position⁵

Buffer

- 2.9 The NPPF requires that Local Planning Authorities apply an additional buffer of 5% to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, Local Planning Authorities should increase the buffer to 20% to provide a realistic prospect of achieving the required supply, and to ensure adequate market choice and competition for land.
- 2.10 There is no definition of persistent under delivery; however at the appeal hearing detailed in paragraph 2.8 above, the inspector felt that a 20% buffer was desirable given that shortfalls had arisen in North Norfolk over a sustained period. Given this, this statement adds a 20% to the housing requirement over the five year period.

⁵ Paragraph 31 - A copy of the appeal decision can be found on the Council's website at the following link: <http://www.northnorfolk.org/planning/3506.asp> .

2.11 The 2016 Central Norfolk Strategic Housing Market Assessment takes into account the historical backlog and resets the base year to 2012. The Council considers that only the shortfall accrued since 2012, the base year for the most up to date evidence on Objectively Assessed Needs, should be addressed in this Statement as adding the backlog from an earlier period has already been accounted for in the SHMA and inclusion of this in the current requirement would amount to double counting. For completeness the table below sets out the total completions for the whole plan period 2001 -2016) There is an identified shortfall of 73 dwellings which has arisen since 2012.

Table 1- Completions against requirement 2001-2016

Year	Completions	Annual requirement	Annual Shortfall (against requirement)	Cumulative backlog
Core Strategy requirement (Policy SS3- 8,000 dwellings / 400 pa between 2001 – 2021)				
2001/02	367	400	-33	-33
2002/03	428	400	+28	-5
2003/04	230	400	-170	-175
2004/05	250	400	-150	-325
2005/06	446	400	+46	-279
2006/07	341	400	-59	-338
2007/08	551*	400	+151	-187
2008/09	258	400	-142	-329
2009/10	416*	400	+16	-313
2010/11	178	400	-222	-535
2011/2012	337	400	-63	-598
Strategic Housing Market Assessment requirement 10,080 dwellings / 420 dwellings between 2012 – 2036 (revised OAN requirement includes backlog from 2001-2012 period)				Cumulative shortfall
2012/13	242	420	- 178	-178
2013/14	383	420	- 37	-215
2014/15	503	420	+83	-132
2015/16	479	420	+59	-73
Total**	1607	1680	n/a	-73

*includes an unusual number of dwelling completions on former Airbases in the District – Coltisham & West Raynham. ** 2012-2015/16.

2.12 In light of the above the Council concludes that it should, over the next five years, be aiming to deliver **522** dwellings each year, calculated as follows:

Table 2 - Annual housing requirement over next five years

a	Annual OAN requirement	420
b	Current annualized shortfall (73/5)	15
c	OAN plus shortfall (a+b)	435
d	Current annual requirement (c+20% buffer)	522

Stage 3 - Site Identification (supply)

2.12 The NPPF at footnote 11 to paragraph 47 sets out the requirements of the deliverable sites which may be included within the five year supply. This states that in order for a site to be considered deliverable it should be:

- **Available** - the site is available for development now;
- **Suitable** – the site offers a suitable location for development and would contribute to the creation of sustainable, mixed communities;
- **Achievable** – there is a realistic prospect that housing will be delivered on the site within five years.

2.13 In addition to the NPPF, the national Planning Practice Guidance (PPG) identifies the type of sites which can be considered against these criteria⁶. This states that deliverable sites can include those that are:

- Allocated for housing in a development plan;
- 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 years;
- An allowance for unidentified sites (windfalls) provided that there is robust evidence that such sites will continue to deliver new homes.⁷

2.14. This assessment has considered that sites with planning permission are suitable and available, as this test was made at the planning application stage. Where assessing sites deliverability within a five year period sites have been considered as either large or small sites. Large sites are those for 10 or more dwellings, whilst small sites are those for less than ten dwellings. Large sites were defined having regard to the threshold for major planning applications. A judgement on delivery rates for those sites delivering 10 or more is based on local evidence and has been undertaken in order to inform the housing trajectory. Details on site delivery rates assumptions are included in the tables in Appendix 1 for each of these sites.

⁶ National PPG paragraph 31., ID 3-031-20140306

⁷ NPPF – paragraph 48

2.15 On small sites it is not practicable to appraise each site individually, due in part to the number of small scale sites which have the benefit of planning permission. In order to reflect a more accurate housing trajectory approach for this monitoring year, assumptions are used to project the housing delivery for the small scale development by applying a 10% drop out rate. In concluding the delivery rate for small scale permissions, the calculation has distributed small site completions evenly across the five years notwithstanding that precise delivery rates will vary across the period (Appendix1).

Specific Approach to Windfall

2.16 Local Authorities are allowed to make an allowance for development coming forward as windfall within the five year period. These are sites which have not been specifically identified in the Local Plan process and may not yet have planning permission. The national PPG states that *“a windfall allowance may be justified in the five year supply if a local planning authority has compelling evidence⁸”*. The NPPF states in paragraph 48 that a windfall allowance should be *“realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”*

2.17 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 unidentified sites and of the 5,409 dwellings provided since 2001, around 4,960 are on windfall sites as detailed in Table 1, Appendix 2. Since the definition of brownfield was altered to exclude garden sites in 2010⁹, windfall (excluding gardens) has delivered 1,673 dwellings at an average rate of 278 dpa. 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 a slightly increased average of 299 dpa, 2011-2016, (Appendix 2).

2.18 In general it is widely assumed that windfall represents a diminishing source of supply however there is no real evidence that this is the case in North Norfolk. It is considered that the level of windfall sites coming forward is likely to be maintained, for reasons including that the adopted policies of the Core Strategy continue to encourage many types of windfall development and recent changes to permitted development rights which reduced the need for planning permission for conversions to residential use continue to add flexibility.

2.18 The historical trend detailed in Appendix 2 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

⁸ PPG paragraph 24.ID 3-24-20140306

⁹ In June 2010 PPS was revised removing garden sites from the definition of Brownfield. This exclusion is carried into the definition of previously developed land in the NPPF.

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.

2.19 The Council recognises that relying on historical trends alone is not sufficient to comply with the ‘compelling evidence’ test required in paragraph 48 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.

2.21 Rather than just relying on historical delivery rates this statement seeks to identify specific sources of windfall supply to demonstrate that they will continue to be available and contribute to the future supply of dwellings. The following potential sources of windfall are excluded from the future supply:

- **One off large scale windfall sites** – Occasionally unexpected large scale developments may come forward such as the recent permission for 153 dwellings at Gresham School, Holt or on one of the numerous former airbases that are located in North Norfolk. 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.
- **Long term empty properties** – Over a number of years the Council has been successful in bringing long term empty homes back into use. Although this may well continue the five year supply calculation is concerned with the net increase of housing stock¹⁰.
- North Norfolk has a significant number of **static caravans** used primarily for holiday accommodation. Increasingly permission is being sought for permanent occupation. This calculation does not take into account any future additional dwellings brought forward from such permissions.
- **Garden sites** – in 2015 /16 the total identified windfall delivered on garden sites was 17. (Appendix 2). The NPPF states that any allowance for windfall should not include that from residential gardens.

The approach taken avoids the potentially distorting impacts of one off historical supply and is considered more robust by focusing on those sources of windfall which are predictable.

¹⁰ The ‘net’ number of homes is the increase in homes whereas the ‘gross’ is the actual number of homes provided. For example, if an existing house was demolished and 4 built in its place, the gross housing number would be 4, but the net increase would be 3

2.22 In addition given that current small scale planning applications may contain existing windfall development and to avoid the potential for double counting, it is assumed that new windfall permissions will not take effect until later in the five year period. Accordingly, the windfall allowance has only been applied from the second year of the five year period.

2.23 In reaching a conclusion on future windfall supply the following analysis has been used:

- **Infill developments and redevelopment within selected settlements:** - 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 which make up the developed hierarchy 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 2016, approximately 969 dwellings can be attributed to infill and redevelopment from windfall¹¹ in the 26 service towns and villages. This equates to approximately an annual delivery rate of 194 dwellings.
 - **It is assumed that 100 dwellings per annum**, approximately 52% of this recent delivery rate will come from this source over the next five years.
- **Conversions of rural buildings and removal of holiday occupancy only conditions on holiday lets:** - 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. Combined with permitted development rights this has resulted in permissions for 210 new conversions and the removal of holiday only conditions on a further 110 properties over past four years (Table 2, Appendix 2).

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 remains a diminishing source of supply and that not all barns will be converted nor all holiday occupancy conditions removed, and the Council has only included a modest allowance from this source. In addition due to the potential for double counting the removal of holiday conditions has been discounted from inclusion in the future trajectory at this time.

¹¹ Appendix 2 table 1 b-d-table 2 c-table 3 a

- **It is assumed that 10 dwellings per annum**, approximately 24% of the recent delivery rate will come from this source.¹²
- **Rural Exceptions Development:** - 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 of 248 dwellings have been provided since 2001/02 as detailed in Appendix 2, table 3. Over the next five years the Council is committed to developing a further 82 dwellings in co-operation with registered providers and is providing substantial loan funding to facilitate this. The majority of these schemes are on identified sites, pre-application discussions are underway, and funding is in place. In addition, a further 37 dwellings are being discussed for various sites throughout the district which may also deliver within the remainder of the plan period, although these are in the very early stages of development and funding is not secured. None of the sites are sufficiently advanced to be included in Appendix 1 of this statement.
 - 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 10 dwellings per annum.**
- **New Sources of development:** The three main PD rights changes which affect the district are the relaxation of the requirements for changes of use applications for:
 - Office to residential conversion to dwelling houses (Part 3, Class O);
 - Storage or distribution to dwelling houses (Part 3, Class P), and;
 - Agricultural buildings to dwelling houses (maximum 3 dwellings) (Part 3, Class Q).

It is expected that Classes O and P will only contribute a modest supply to the future windfall allowance and are time limited. No assumption for delivery from these sources has therefore been made in the windfall projections. The changes to national policy for agricultural conversions have only been in place since April 2014 so the numbers of applications for prior approval of these types of development are low at present with only 10 dwellings having been given prior approval through Class Q. In addition to this though, full planning applications for conversions to more than 3 dwellings continue to come in and have resulted in approvals for an additional 25 dwellings in the same period. It is expected that permitted development rights for agricultural buildings will deliver more homes in the future.

- **A conservative assumption of 15 dwellings per annum is assumed for future projections, based on historic delivery of this source of supply.**

2.24 In addition to the exclusion of garden land **this calculation assumes the delivery of 135 dwellings per annum through windfall development.** In comparison the average historical position 2010 – 2016 the average rate has been 278, (Appendix 2). The windfall allowance has only been applied from the second year of the five year period.

¹² Appendix 2, Table 2 – $10/42 \times 100 = 23.8\%$

2.25 This approach was considered at the Lodge Close, Holt appeal hearing¹³ with the inspector recognising that identifying specific future windfall sources, rather than relying on past performance was a better approach.

Residential Institutions

2.26 The national PPG also permits local authorities to include housing provided for older people, including Use Class C2 residential institutions against their housing requirement¹⁴

Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.....

The five year supply calculation is concerned with the net increase of housing stock¹⁵ and the Council must decide whether it has robust information to justify including residential institutions such as care homes into its supply calculation. Similarly student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Where all the facilities for each unit/dwelling are behind a separate door, these can be counted in full towards the housing supply. However if accommodation is comprised of bedrooms as opposed to dwellings, the number of bedrooms provided does not necessarily correlate to the number of dwellings such as a care home and a reasonable assumption has to be made as to what extent an increase in care accommodation would lead to the release of existing housing onto the market, and thus contribute to net supply. Where this is included it is considered reasonable to apply a 50% reduction to reflect the fact that a proportion of bed spaces in residential homes are likely to be taken up by individuals who do not release their previous dwelling for occupancy by a separate householder.

2.27 The Joint Central Strategic Housing Market Assessment does not readily identify a separate need for C2 dwellings in its assessment of OAN. This is also consistent with the previous SHMAA undertaken by this authority and the matter has not previously been included in the Council's Five Year Assessment. Current Government policy is underpinned by the principle of sustaining people at home for as long as possible and although a small number of such schemes may come forward it is assumed at this time that the provision of residential care, C2 will remain constant and that the need will be provided for as specialist housing in Use Class C3.

¹³ Paragraph 34-36 - A copy of the appeal decision can be found on the Council's website at the following link: <http://www.northnorfolk.org/planning/3506.asp>

¹⁴ National PPG ID para 37 Reference ID: 3-037-20140306 & 38 Reference ID: 3-038-20140306)

¹⁵ The 'net' number of homes is the increase in homes whereas the 'gross' is the actual number of homes provided. For example, if an existing house was demolished and 4 built in its place, the gross housing number would be 4, but the net increase would be 3

3 Stage 4 – Calculating the years of supply

- 3.1 The table below shows how the overall land supply position in the District is calculated. The table includes figures for the number of dwellings built, a revised annual average requirement (based on the identified need in the Central Norfolk Strategic Housing Market Assessment, published 2016) and the accumulated shortfall since 2012. **The land supply position as at 1st April 2016 is 5.6 years calculated as follows:**

North Norfolk District Council Five Year Housing requirement - (1 April 2016 - 31 March 2021)	
OAN requirement 2012- 2036 (SHMA, 2015) (420dpa)	10,080
Requirement 2012 - 2016 (420 x4)	1,680
Completions 2012 – 2016 (table 1)	1,607
Residual requirement over rest of period (2016- 2036), (10,080-1,607) (20yrs)	8,473 (424dpa)
Shortfall since 2012 (1680-1607)	73
5 year requirement 2016 - 2021 (420 x 5)	2,100
Inclusion of identified shortfall (2,100+73)	2,173
Shortfall plus NPPF buffer (20%) (2,100 +73 + 20%(435))	2,608 (521dpa) residual requirement
Total deliverable supply over five years (See Appendix 1)	2,936
Excess in supply (2,936 - 2,608)	328
Supply in years (2,936/521)	5.6 years

4. Monitoring the five year supply

- 4.1 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 in April/May each year.
- 4.2 To maximise the likelihood of the housing requirement being met and to incentivize delivery the Council has introduced a temporary Housing Incentive Scheme aimed at improving the viability of residential development and encouraging the early commencement and delivery of residential schemes. Details of the scheme are available on the Council’s website¹⁶. Nevertheless delivering this number of dwellings on a consistent basis over the next five years will depend on continued development on many of the larger site allocations and the continuation of improved market conditions. The Council will keep the land supply position under regular review.

¹⁶ <http://www.northnorfolk.org/planning/18904.asp>

Part B - Housing Trajectory

5 Introduction

- 5.1 Annual recording of dwelling commencements, dwellings under construction, dwelling completions, new planning permissions granted, and assessment of what developments may occur in the coming years is an essential part of the 'plan, monitor, review' approach to housing delivery and plan making. A Housing Trajectory is produced annually by the Planning Authority to illustrate past and likely future trends in housing provision having regard to land availability and historical/future patterns of development.
- 5.2 This section outlines the methodology used in producing the trajectory and includes a trajectory for North Norfolk covering the period 2012 to 2021. It identifies the quantity of planned housing development over this period, how much of this has been built and what remains to be provided. It draws together existing published sources of information on site suitability, availability, achievability and viability, and makes an assessment of when development may occur in the future.
- 5.3 It should be recognised at the outset that there are a wide range of influences on the housing market and consequently assessments about the levels of future provision are susceptible to change. Nevertheless, if a robust and cautious approach is taken and the trajectory is subject to regular review, some broad conclusions can be reached about levels of future housing supply in the District over the medium to long term.

6 Information Sources

- 6.1 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:
- **Strategic Housing Land Availability Assessments** – first published in 2009 and updated in 2010, these studies look at the capacity of the district to accommodate housing growth. Studies identify all reasonable potential sources of dwelling completions in the district and make 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. The Council is currently working on a Housing and Employment Land Availability Assessment (HELAA), jointly through the Norfolk Strategic Framework and an Updated HELAA study is likely to be published in late 2016.
 - **Five Year Housing Land Supply Statements** (Part A of 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 minimum levels of planned growth identified in the adopted Core Strategy. In addition to dwelling completions and planning permissions these statements also include an assessment of when identified development sites will be built. In the absence of a five year supply of development sites intervention may be required via the allocation of new deliverable development sites in development plan documents or the grant of additional planning permissions on unallocated sites where development would be sustainable in accordance with the NPPF.

- **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 Councils web site.

6.2 Whilst the trajectory is prepared by the District Council it is the result of discussions with landowners, developers, Housing Associations and others with an interest in housing development in North Norfolk. The Strategic Housing Land Availability Assessment in particular is primarily derived from information supplied by public and private sector housing providers.

7 Need and demand

7.1 The evidence¹⁷ indicates that there are high levels of both demand and need for additional housing in the district with a requirement for 10,080 dwellings in total of which 2,200 should be affordable between 2012 and 2036. The need for additional affordable housing in parts of the District is in large part due to higher than national average house prices and lower than average incomes.

7.2 In the past the slowdown in both the local and national economy has had a significant impact on the local new build housing sector. Both dwelling completions and dwelling commencements had declined however over the medium to long term the demand locally for market housing has been strong, fuelled in part by high levels of in-migration and in recent years have shown signs of significant improvement.

8. The Local Supply of Housing Development Land

8.1 Historically for a number of years the Council has applied land use policies that have 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 early 1990s and a concern that if such trends were allowed to continue dwelling completions in the district would exceed the requirement of the then adopted 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

¹⁷ Joint Central Strategic Housing Market Assessment 2016, ORS

new dwelling completions to locations within the boundaries (infill development) of approximately 80 defined settlements. 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 24 settlements which have now been selected for further growth in the current adopted Core Strategy (2008).

- 8.2 Average annual dwelling completion rates in the District have declined in the last ten years and have only recently shown signs of recovery. Large releases of dwellings at the former airbases at Coltishall and West Raynham produced high 'completion' rates in 2008 and 2010. Whilst the previous economic climate has played a significant part in previous reductions, the absence of larger scale housing land allocations until 2011 has undoubtedly limited development opportunities in recent years. The Council considers that both land supply and market factors have influenced the reduction in dwelling completion numbers in the district.
- 8.3 In 2011 the Council adopted a Site Allocations Development Plan which allocated land for an additional 3,400 dwellings. These allocated sites represented a new source of housing land supply that had not previously been available in the District. As outlined elsewhere in this statement the Council has introduced a temporary Housing Incentive Scheme which includes a range of measures designed to improve development viability and encourage the quicker delivery of development. 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. New dwelling completions continue to show some improvement and remain above the levels predicted in last year's statement (435), a trend which looks set to continue given the higher number of dwellings under construction and with new planning permissions.

9. The Housing Trajectory 2012/13– 2021

- 9.1 The housing trajectory illustrates in graphical form the quantity of housing development in the district since 2012, the predicted future levels up to 2021 and compares this to the planned levels of housing growth over this period.
- 9.2 Four separate sources of dwellings are modeled:

1-Dwellings which have been built

Dwelling completion rates are recorded annually and published on the Housing Land Availability (HLA) web page (<http://www.northnorfolk.org/planning/3495.asp>). Completions are monitored via Building Regulation completion records and site visits. A dwelling is recorded as complete when it is substantially completed and available for occupancy. Completions include new build dwellings, sub-divisions, conversions, changes of use, and premises where restrictive planning conditions are removed to allow residential occupancy. These are expressed as net additions to the housing stock (i.e. taking account of any housing loss).

Dwellings and other types of accommodation which are subject to holiday occupancy restrictions are not counted as net additions. Only self-contained dwelling units in the C3 Use Class are included notwithstanding that some other types of residential accommodation are the sole and principle residence of the occupant (e.g. Care and nursing homes)

2-The permitted supply: sites with planning permission including allocations with permission

This comprises of sites which already have planning permission. Dwelling numbers in this category will include dwellings with planning permission which have not been started and those which are under construction but are not yet recorded as completions. The Authority calculates that approximately 10% of all dwellings permitted on sites of 10 dwellings or less will never be built and this is deducted from the figures. Small sites with permission are averaged over the 5 year period.

The Five Year Land Supply Statement reaches conclusions about the likely dwelling delivery rates on sites with planning permission, which are detailed in Appendix 1. Overall it concludes that whilst there is already planning permission for around 2,720 dwellings¹⁸ which have yet to be built (before lapse rate on small sites is applied) it is likely that only a proportion of these will be built over the five year period from 2016 to 2021.

The trajectory includes those dwellings in this category identified in the Five Year Land Supply as likely to be built over this five year period. For the purposes of producing a trajectory the total dwellings on small sites (less than 10) in this source are divided equally into five annual amounts and shown as being built at an equal rate over the five year period (2016-2021). For larger sites (more than 10), an assessment has been made as to when development is likely to occur between the current year and 2021. In practice precise delivery rates will vary year on year.

3-Supply arising from the allocations in the Site Specific Proposals Development Plan

(excluding those with planning permission (included above))

Since April 2011 the allocated sites have been included in future housing supply. The rate at which these will deliver dwellings is based on the evidence in the Strategic Housing Land Availability Assessment and takes into account a wide range of information including site ownership, registered interests from the development industry, stated intentions of developers, time taken to secure planning permission, any specific site constraints that are likely to impact on delivery times and the current economic climate. These sites did not start to deliver housing completions until 2013 but development has now commenced on many and they are expected to be an increasing large proportion of dwelling completions in future years.

¹⁸ Appendix 1 table 2, total permission s incl Allocations in 5year supply + beyond + 10% lapse rate small sites

4-Supply arising from windfall sites

It is not practical or possible to identify all sources of future housing development on a site by site basis. For example, the SHLAA and Site Allocations DPD focus on larger sites (mainly those that can accommodate 10 or more dwellings in towns and three or more in villages). Future housing supply in the District will comprise of developments on a mixture of both identified and unidentified sites. In the past these unidentified sites have been the sole constituent of housing development in the district and have yielded an average of 346 dwellings per year over the plan period.

The adopted Core Strategy identified a historical windfall rate of approximately 250 dwellings per year to the total housing supply. The historical position between 2010 – 2016 delivered on average 278 per year (Appendix 2). To ensure that the trajectory adopts a cautious approach to housing delivery and this source of supply the Council has further reduced likely dwelling completions in this category to assume 135 dwellings a year, excluding the first year of the five year period. See windfall assessment in chapter 2.

- 9.3 The four sources described above are shown in different colours on the graph in Appendix 4. The table in Appendix 3 provides dwelling numbers for each constituent part of the supply, 2016-2021. Expected dwelling delivery rates on the proposed housing allocation sites are modelled in Appendix 1.

In producing this trajectory the following assumptions have been made:

- The recent improvement in the housing market will be sustained over the next few years.
- On the larger development sites (allocations) a period of two/three years from the date of a planning application to dwelling completions should be expected unless there are specific circumstances to suggest otherwise. A shorter time period may be adopted where a site is subject to the provisions of the Housing Incentive Scheme.
- That allocated development sites cannot be developed until specifically identified constraints have been addressed.
- That around 10% of planning permissions on sites of 10 dwellings or less will never be built.
- That larger development sites are unlikely to deliver more than 30 dwellings per year if developed by a single developer unless there is evidence that would suggest otherwise. For example, some national house builders will build at higher rates (depending on market conditions) and the 'block' release of Housing Association properties will produce higher completion numbers in some years.
- Windfall will contribute from the second year.

Allocation
 With permission
 Small Site
 Additional Sources of Supply
 Windfall projections

Table 1: Schedule of sites and projected delivery of sites of 10 dwellings or more

Data correct as at 01.05.2016

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 and comments								
		Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	AH contribution	Completed before April 2016	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Beyond
ALD01	Garage site / Pipits Meadow Aldborough	8				4	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			4	0	20		0							20	Pre-application discussions with land owner who intends to secure a developer and make an application under the Housing Incentive Scheme. Whilst the site is currently available there insufficient evidence of delivery at this stage to include within five year supply.
BACT05	Land to rear of Duke of Edinburgh Public House, Bacton	14	24			24	0	24		24		24						Allocated site in suitable location for development which has recently been acquired by Housing Association. There has been detailed pre application discussions with LPA for a scheme of 24 units and a full planning application has been made (decision pending). Provider confirms that the scheme is viable and funded and would be delivered immediately following grant of planning permission.
BRI02	Land West of Astley Primary School, Briston	30				15	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	12		5	0	12		12	6	6						The site is allocated and is available for development now . A full planning application by a house builder (prospective purchaser) for 12 units is pending decision. Draft tender document submitted with application confirms quick delivery if approved.
CAT01	Land off Lea Road, Catfield	15				7	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			9	0	18		18		9	9					Pre-application discussion with house builder. Agents preparing full application for approx. 18 units with view to early commencement under Housing Incentive Scheme but timing of planning application not yet agreed.

C01	Land adjacent to East Coast Motors, Beach Road, Cromer	40				18	0	40		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	Land at rear of Sutherland House, Overstrand Road, Cromer	60	60	68		27		68		68			22	22	24			Site is owned by local development company, is allocated for development, development is viable and subject to grant of planning permission the developer confirms it would be delivered within three years. Pre-application discussions have taken place in relation to a full application which has been submitted for 68 sheltered housing apartments. Likely commencement of development shortly after permission granted.	
C07 13/0451	Land at Jubilee Lane / Cromer High Station, Cromer	40				8	18	8	40		0							32	Insufficient certainty to include delivery of remainder within current five year period. It is therefore assumed that this site is currently unlikely to deliver completed development until after 2021.
C14 13/0247	Land West of Roughton Road, Cromer	160				145		39	106	31	106	30	30	25	15	6			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.
ED2	Cromer Football Club, Mill Road, Cromer	10					4		10		0							10	On-going discussions regarding possible relocation of football club and partial development of site to provide a doctors surgery. The site is unlikely to deliver any dwellings in next five years.
F01 (part)	Land North of Rudham Stile Lane, Fakenham	800					200		800		60				30	30		740	The site is allocated for development and is subject to an approved Development Brief. It is mainly owned by Trinity College with a small number of private land owners. An outline planning application is pending for 78 dwellings and a full application for a 60 dwelling sheltered scheme is expected during 2015. Once delivery commences this site is anticipated to deliver between 40-100 units per year dependent on the number of developers but given that none of the site yet enjoys full planning permission delivery is assumed to be limited in the next five years
F01 (part) 14/1212	Land North of Rudham Stile Lane, Fakenham			78					78		78			30	30	18			
F01 (part)	Land North of Rudham Stile Lane, Fakenham		60			60			60		60			30	30				
F05 (remaining part without permission)	Land between Holt Road & Greenway Lane, Fakenham	36					16		36		0							36	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.
HAP07	Land West of Whimpwell Street, Happisburgh	14					7		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.
H01 11/0978	Land West of Woodfield Road, Holt	100			85		38		85		85			30	30	25			Resolution to grant Reserved Matters Planning Approval but issue of decision awaiting completion of Section 106.
H09 PO/13/1306	Land at Heath Farm / Hempstead Road, Holt	200			215		90		215		120		30	30	30	30		95	Site has outline Planning Permission. Housebuilder indicates commencement in early 2017 and completion of phase 1 (80 units by May 2018)
H12	Land off Hempstead Road	70					32		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
HOR06 11/1505	Land East of Abbot Road, Horning	26		26			13		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 possible but insufficient evidence at this stage to include within five year supply.
SN01	Land at junction of Holt Road & Kettlestone Road, Little Snoring	20			20		10		20		20				10	10			Outline planning permission granted. Site is available and suitable for development.
SN05	Land adjacent to Little Snoring Primary School, Kettlestone Road, Little Snoring	10					5		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					7		15		15			10	5				Pre-application advice offered. Full application under Housing Incentive Scheme expected during 2015.
LUD06	Land at Eastern end of Grange Close, Ludham	10					5		10		0							10	No current developer interest. No exceptional development costs or infrastructure constraints but no evidence of likely delivery within five year period.
MUN06	Land at Grange Cottage / Water Lane, Mundesley	40					0		40		40			20	20				Current Pending Full Application PF/15/1534. Early delivery proposed under Housing Incentive Scheme
MUN07 PF/14/10795	Land South of Trunch Road, Mundesley	10				9	0	3	6	6	11	6	5						Site is under construction.
NW01 (part of site) PF/13/0866	Land at Norwich Road / Nursery Drive, North Walsham	176				176	85	27	176	47	149	40	40	30	30	9			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

19901666	Highview, Cromer					41		21	20	2	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.
19941720 19961424	Central Road, Cromer					106		80	26		0							26	26 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.
09/0826	Burnt Hills, Cromer					13			13	1	7		7					6	Owner indicates small number of completions over five year period dependent on market conditions
19892604 20001459	Smiths Lane, Fakenham					81		51	30		0							30	Very slow build rates in recent years, no sign of recent activity. Unlikely to be completed in 5 years so no allowance made at this stage.
20081342	107-109 Holt Road, Fakenham					16		1	15		0							15	Whilst site has full planning permission there is insufficient evidence of delivery to include at this stage.
20070477 15/0854	Newman's Yard, Norwich Road, Fakenham					20			20		0							20	The 2007 permission has been implemented but no further works on the site. Site recently sold to a new developer who has had pre-application discussions about a scheme of 22 units but no progression to an application. No delivery assumed within 5 years.
14/0274, 14/0283, 14/0284	Land South of Cromer Road and North/East of Grove Lane, Holt			153			15		153		120		30	30	30	30		33	Site has full planning permission and is owned by Hopkins Homes. Development programmed to commence 2016
14/1603	Land south of Lodge Close, Holt				170		63		170		0							170	Planning permission refused and dismissed on appeal so not included in five year supply
069.047	Melton Constable Hall, Melton Constable					33		8	25	3	0							25	Extant planning permission but no recent progress. No units included within five year supply.
20080329	Land off Grove Road, Melton Constable				38				38		0							38	Has planning permission but no known developer interest so not included within five year provision at this stage.
20070751	Hall Lane Garage, Hall Lane, North Walsham					18		16	2		2				2				Site predominantly complete but with 2 units remaining to be converted. (Revoke)
10/0682	13-21 Bacton Road, North Walsham					21		8	21	13	13	13							Development commenced on conversion element of approved scheme with new build to follow thereafter. Completion expected by 2017/18.
14/1559	Former Cherryridge Poultry Site, Church Street, Northrepps			40		40	7	10	30	15	30	15	15						Development underway and programmed for completion over next two years
PM/14/0854 (075.001)	Hillingdon Park, Overstrand					35		25	10		15	5	5	5					RESERVED MATTERS FOR REMAINING 10 PLOTS APPROVED and development due to commence shortly.
PO/15/0665	Land adjacent to Chapel Road, Roughton				12				12		12				12				Funded Housing Association scheme due for completion 2017/18
PF/14/0644	Land at Seaview Crescent, Sheringham					11			11	5	5	5							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 made for dwellings within next five years.
19950722 12/1082	Land off Cremer Street, Sheringham					13		12	13	1	1	1							Development has been largely completed. Revisions to two plot designs also completed. Remaining unit to build.
15/0001	Former Hilbre School, Sheringham			32	40				32		32	6	20	6					Outline permission for 40 dwellings extant. Full planning application pending supported by application to Housing Incentive Schemes for 32 dwellings. Proposing immediate start upon grant of permission.
092.001	Beechlands Park, Southrepps					32		25	7	3	0							7	Site developing slowly, may be completed within 5 years
092.019	Clipped Hedge Lane, Southrepps					26		20	6	3	0							6	Site developing slowly, may be completed within 5 years
20071919	Old Baker's Yard, High Street, Stalham					15		4	11		0							11	Development has started with completion of road frontage units but no recent activity on remainder of site so not currently included within five year supply.
10/0295	39-52 Renwick Park, West Runton					10		1	10		6				4	2		4	Very slow delivery rates with plots built at intervals.
20080506	RAF West Raynham, Massingham Road, West Raynham			58					58		58				28	30			Resolution to grant full planning permission

Total from small sites (under 10 dwellings which already have planning permission)					67	759				794	262	715	143	143	143	143	143		794 dwellings have planning permission and are yet to be completed. The figure of 715 represents 794 dwellings minus a 10% lapse rate.		
N/a	RAF West Raynham			58					22	36	7	36	10	10	10	6			Ex-RAF housing stock slowly being released (note – this is separate from the above planning permission).		
Windfall	N/a											540	0	135	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 justification.	
												2936	328	587	757	712	552				

Table 2: Summary of Schedule of sites and projected delivery

	Total dwellings in 5yr supply	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Beyond
Total Allocations	1326	134	217	400	363	212	10	1441
Total Allocations with PP	939	134	217	277	199	112	0	183
Allocations without PP	387	0	0	123	164	100	10	1258
Total Planning Permissions	1070	194	235	222	214	205	0	450
Large Sites with PP	319	41	82	69	65	62	0	450
Small sites (with 10% discount)	715	143	143	143	143	143	0	0
West Raynham	36	10	10	10	6	0	0	0
Windfall	540	0	135	135	135	135	135	1890
Total	2936	328	587	757	712	552	145	3781

Appendix 2: Windfall

	Year of delivery	Total completions in year A = (b + e)	Delivered as Windfall (including garden development) B =(e-a)	Delivered as windfall (excluding Garden Development) C = (b – d)	Delivered on Garden Land (d)	Delivered on Allocation E = (a-b)	% Windfall (including Garden Development) F= (b/a*100)	% Windfall (excluding Garden Development) G= (c/a*100)	% allocations	
No adopted site allocations	2001/02	367	367				100%		0%	
	2002/03	428	428				100%		0%	
	2003/04	230	230				100%		0%	
	2004/05	250	250				100%		0%	
	2005/06	446	446				100%		0%	
	2006/07	341	341				100%		0%	
	2007/08	551	551				100%		0%	
	2008/09	258	258				100%		0%	
	2009/10	416	416				100%		0%	
	2010/11	178	178			17*	100%		0%	
Sites adopted	2011/12	337	337			15*	0	100%	0%	
	2012/13	242	242			19*	0	100%	0%	
	2013/14	383	276	257	19	107	72%	67%	28%	
	2014/15	503	363	315	48	140	72%	63%	28%	
	2015/16	479	277	260	17	202	58%	54%	42%	
	TOTAL 2001 - 16	5409	4960				449			8.3%
	TOTAL 2008 - 16	2796	2347/ 293pa							
	Total 2010 - 16	2022	1673 / 278 pa	832		135 /17pa*				

*Includes estimates.

Table 2: New Dwellings in Rural Building Conversions.

Year of delivery	New Building Conversions permitted (A)	Removal of Holiday conditions permitted (B)	Total Potential New Dwellings Provided (C)
2011/12	21	54	75
2012/13	10	3	13
2013/14	25	21	46
2014/15	66	16	82
2015/16	88	16	104
Total	210	110	320
Average per annum	42	22	64

Table 3: Delivery of rural exceptions development.

Year of delivery	Rural exceptions sites – total built (A)
2001/02	0
2002/03	0
2003/04	0
2004/05	0
2005/06	15
2006/07	39
2007/08	10
2008/09	30
2009/10	20
2010/11	44
2011/12	22
2012/13	12
2013/14	48
2014/15	8
2015/2016	0
TOTAL	248

Projected windfall assumptions

2.32 In order to provide a cautious approach to estimating future supply the following allowances for each source of windfall have been 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.

2.33 **This equates to a total of 135 dwellings per annum,** In comparison the average historical position of 278 between 2010 – 2016.

2.34 Given that current planning applications contain existing windfall development it is assumed that new windfall permissions for small scale development will not start to take effect until later. The windfall allowance has only been applied from the second year of the five year period.

Appendix 3: Housing Trajectory Table (April 2016)

	Built	Deliverable planning permissions	Expected development on unidentified sites	Deliverable allocations	Total	Original annual average requirement	Original cumulative requirement	Difference (average - completions)	Cumulative shortfall	Cumulative total
2012/13	242				242	420	420	-178	-178	242
2013/14	383				383	420	840	-37	-215	625
2014/15	503				503	420	1,260	83	-132	1128
2015/16	479				479	420	1,680	59	-73	1607
2016/17		194	0	134	328	420	2,100	-92	-165	1935
2017/18		235	135	217	587	420	2,520	167	2	2522
2018/19		222	135	400	757	420	2,940	337	339	3279
2019/20		214	135	363	712	420	3,360	292	631	3991
2020/21		205	135	212	552	420	3,780	132	763	4543

Appendix 4 - Housing Trajectory 2016
Number of dwellings projected to be completed each year (1st April - 31st March)

