Five-Year Supply of Housing Land 2019 - 2024

April 2019



North Norfolk District Council Planning Policy Team 01263 516318 planningpolicy@north-norfolk.gov.uk

Planning Policy Team, North Norfolk District Council, Holt Road, Cromer, NR27 9EN www.north-norfolk.gov.uk/localplan

All documents can be made available in Braille, audio, large print or in other languages. Please contact 01263 516318 to discuss your requirements.

Five Year Supply of Housing Land 2019-2024

Contents

1.	Introduction	4
2.	Context	4
3.	Headlines for 2019	6
4.	Methodology	7
S	Stage 1: Identifying the Five Year Period	7
9	Stage 2: The Requirement - Identifying the scale of housing provision to be delivered	7
9	Stage 3: Deliverable Supply	9
9	Stage 4: Calculating the years of supply	10
5.	Conclusion	10
6.	Monitoring the five year supply	10
7.	Information Sources	11
Apı	pendix A - Specific Approach to Windfall	12
(Occasional large departures from policy	13
(Conclusion	14
Αp	pendix B - Schedule of Sites & Projected Delivery of Sites	15

1. Introduction

- 1.1 This housing land supply statement sets out North Norfolk District Council's residential land supply position as at 31 March 2019. It compares the current **requirement** for new homes in the District with the **deliverable supply** to establish the number of years of supply that are available.
- 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 all identified objectively 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 that are likely to influence future delivery rates. Assessments should be realistic and be made publicly available.
- 1.3 During 2018 a new National Planning Policy Framework was published which included the introduction of a revised approach to establishing how many homes might be required in the future. This was supported by the introduction of a new Housing Delivery Test (HDT) designed to ensure that Local Authorities plan to deliver sufficient homes.
- 1.4 This statement takes full account of the revised NPPF, the new standard national methodology for establishing housing requirements, and the results of the first Housing Delivery Test and explains the Council's methodology for calculating the housing requirement and assessing and comparing this with the deliverable supply. It 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?
- 1.5 In establishing how many homes are likely to be required in the future the Council has resolved not to follow the standard methodology contained in national guidance. The reasons for this and the alternative approach taken are explained in this statement and an associated Strategic Housing Market Assessment 2019 which is separately published on the Council's web site.

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 reflecting their capacity to accommodate growth mainly through infill and redevelopment opportunities.
- 2.2 The current evidence¹ indicates that there are high levels of both market demand and need for additional homes in the District. 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. Annual delivery in the last few years has been in excess of 500 dwellings and the Council currently passes the governments Housing Delivery Test (HDT) by a significant margin.
- 2.3 Over the medium to long term the demand locally for market housing has been strong, fueled largely by high levels of in-migration particularly for retirement and there is an assessed need for around 2,000 affordable homes. 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, undoubtedly also limited development opportunities over this period. 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.
- 2.4 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. About half of these dwellings on allocated sites have now been built and many of the remainder, with the exception of a large site at Fakenham, are expected to be completed within the next five years.
- 2.5 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 will remain in place until the new Local Plan has been prepared.
- 2.6 New dwelling completion rates have shown significant improvement in the last few years mainly as a result of larger scale developments commencing on allocated sites and improved market conditions. In fact, new completions have exceeded the Local Plan requirement of 400 dwellings per year in each of the last five years and this appears likely to continue as the larger consented sites where development has commenced, are built out.

¹ Joint Central Norfolk Strategic Housing Market Assessment 2017, ORS and 2019 update National Household Forecasts 2016 (2014 base), Office for National Statistics National Population Forecasts 2018 (2016 base), Office for National Statistics Local Authority Waiting Lists

3. **Headlines for 2019**

- 3.1 During the year commencing April 2018 to March 2019, 534 net additional dwellings were completed in the District. Completion rates in each of the preceding three years exceeded the requirement for new dwellings as identified in the national Housing Delivery Test (HDT) with the result that the District delivered 126% of its housing requirement over the period. Since April 2014 some 2,504 dwellings have been built in North Norfolk.
- 3.2 In 2018 government 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 is based on the 2014 National Household Projections with a single standardised adjustment to these to take account of local evidence in relation to the affordability of homes. This new approach results 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 2017, to an annual baseline requirement to deliver 553² 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 projections which are currently used in the standard methodology. These population projections were reflected in the Household Projections published in September 2018 which show a similar reduction in the projected number of households, and hence the number of dwellings that might be needed in the District. More recently a further slowing of expected growth rates is projected in the latest 2018 based Sub National Population Projections. However, the standard methodology continues to rely on the 2014 Household Projections and the higher growth forecasts contained within them. Government is reviewing the standard methodology but has indicated that pending the results of this review the 2014-based projections should continue to be used in all but exceptional circumstances.
- 3.4 In June 2019 the Council commissioned Opinion Research Services (ORS) to undertake a partial review of the Strategic Housing Market Assessment (SHMA). This review was focused on establishing the future need for homes in the District and in particular considered if the 2014-based National Household Projections represented a robust starting point for assessing future requirements. The 2014 Projections had previously been accepted as being flawed and shown to overestimate the requirement for new homes in the District. The revised SHMA (2019) concludes that the 2014 Projections overestimate housing requirements by a significant amount and in light of this the Council has resolved that pending the on-going review of the standard methodology the requirement for new homes in North Norfolk is 479 dwellings per annum. This figure is derived from the 2016-based National Household Projections and incorporates the standard affordability uplift required by the national methodology together with a further 5% buffer to extend choice as required by the NPPF.
- 3.5 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 2,747 new homes (See Appendix B - Schedule of Sites & Projected Delivery of Sites 2019-2024).
- 3.6 This equates to 5.73 years land supply when compared to the requirement to deliver 479 dwellings per year.

² Based on 2014 National Household Projections with 2019 based affordability ratio uplift

4. Methodology

- 4.1 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 and applying buffers to extend choice;
 - 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

4.2 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 2019 to the 31st March 2024.

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

- 4.3 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 less than five years old 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.
- 4.4 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 evidence available at the time the 2014 National Household Projections. Compared to the Core Strategy the SHMA identified a slightly higher annual requirement in North Norfolk of 409 dwellings per annum and this baseline figure was used in the production of last year's 2018 Five Year Land Supply Statement.
- 4.5 Although the Council considered that the 2017 SHMA represented the most up to date <u>local</u> evidence in relation to housing need the methodology used in its preparation does not now accord with the more recent NPPF and in particular does not use the new standard national methodology for the assessment of housing need. Paragraph 74 of the 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, <u>calculated in accordance with the new standard national methodology</u>, unless there are sound local reasons for departing from the standard approach. The national methodology currently uses the same 2014-based Household Projections as the published 2017 SHMA but produces a significantly higher annual requirement of **553** dwellings per

- annum in large part due to the addition of a significant uplift³ to the ONS demographic growth projections to assist with dwelling affordability.
- 4.6 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 its requirement over the preceding three years this buffer should be increased to 20%. As North Norfolk has delivered 126% of its requirement as measured under the Housing Delivery Test, a 5% buffer is added.
- 4.7 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 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.
- 4.8 The total Five Year Land Supply requirement based on the standard national methodology is 2,905 dwellings on the following basis:

Table A: Five-year land supply requirement in North Norfolk 2019-2024 Standard Method - 2014 Base

Stage of methodology	No of net new dwellings
Number of dwellings required by standard methodology.	553 per annum inclusive of affordability uplift.
Plus buffer of 5% required by NPPF.	581 per annum
Additions required under Duty to Co-operate.	0
Multiplied by five years.	2,905 deliverable homes over five years.

- 4.9 The 2017 Strategic Housing Market Assessment (SHMA) identified that the 2014-based Household Projections for the District, which are the first input into the current standard methodology are flawed. The Assessment concluded that the National Projections overestimated household growth requirements in the District largely as a consequence of overestimating the needs arising from inward migration. More recently the 2016 based Household Projections conclude that 3,750 less people will live in the District in 2036 than had been predicted to be the case in the 2014 Projections. A further slowing in the rate of population growth is projected in the most recent 2018-based National Population Projections.
- 4.10 In 2019 the Council commissioned Opinion Research Services to undertake a partial review of the 2017 SHMA to understand the reasons for the wide degree of variance between the 2014 and 2016

³ 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 using a published affordability ratio.

Projections. It concludes that the variance can entirely be attributed to improvements in the forecasting model which impact on future population growth. In light of this evidence the Council has resolved not to follow the national standard methodology when assessing the local need for new homes but instead to base its assessment of future needs on the 2016-based projections. As a result of this the requirement for new homes in the District over the next five years falls by around 100 dwellings per year and reduces the five year requirement from 2,905 to 2,395 dwellings.

Table B: Five-year land supply requirement in North Norfolk 2019-2024 Local Method - 2016 Base

Stage of methodology	No of net new dwellings
Number of dwellings required (2016 Household	456 per annum inclusive of affordability
Projections plus affordability Uplift).	uplift.
Plus buffer of 5% required by NPPF.	479 per annum
Additions required under Duty to Co-operate.	0
Multiplied by five years.	2,394 deliverable homes over five years.

Stage 3: Deliverable Supply

- 4.11 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 deliverable⁴. 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.
- 4.12 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 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.
- 4.13 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

-

⁴ As defined in Annex 2 of the NPPF 2018 - Glossary

- potential sources. Full details of each site and the conclusions that the Council has reached in relation to delivery are provided in **Appendix B**.
- 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 explained further in Appendix A.
- 4.14 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

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

The land supply position as at 1 April 2019 is 5.73 years calculated as follows:

	North Norfolk District Council Five Year Housing Supply	
а	5 year baseline requirement 2019 - 2024 (456dpa x 5years)	2,280
b	Additions required under duty to co-operate	0
С	Additions required to address NPPF buffer (a)+(b) x 5%	114
d	Total Five Year Requirement 2019-2024	2,394
е	Annual Requirement over next five years (d/5)	479
f	Total deliverable supply over five years (See Appendix B)	2,747
g	Supply in years (f/e)	5.73

5. Conclusion

5.1 The Council consider that there is a current annual requirement for 479 dwellings per year. This is based on the most up to date evidence available and includes a buffer of 5% as required by the NPPF. It incorporates a substantial (37%) affordability uplift. There are around 2,747 dwellings which the Council considers have a realistic prospect of being built over the next five years. This equates to a **5.73** year land supply.

6. Monitoring the five year supply

6.1 The Council will monitor the five year supply of deliverable sites on a regular basis and published an updated position statement at least once a year. 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 Councils 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.

Appendix A - Specific Approach to Windfall

- A1.1 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.
- A1.2 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 dwellings per annum between 2011-2018.
- A1.3 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.
- A1.4 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.
- A1.5 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. Accepting that these sites do not
 have planning permission and there is no cast iron guarantee that they will be developed, a very
 conservative allowance 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. 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.
- A1.6 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.
- A1.7 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

- A1.8 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.**
- A1.9 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.
- A1.10 The Council recognises that relying on historical trends alone is not sufficient to comply with the 'compelling evidence' test 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.

A1.11 This approach was considered at the Sculthorpe appeal hearing 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

- A1.12 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.
- A1.13 **This equates to a total of 135 dwellings per annum**. In comparison, the average historical position between 2010-2017 was 256 dwellings per annum. The allowance is only applied to the last four years of the five year period to allow for potential lags in implementation.

Appendix B - Schedule of Sites & Projected Delivery of Sites (2019-2024)

			Planni	ing Stat	us		Bu	ild Information	1		As	sessm	ent o	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
ALD01	Garage site / Pipits Meadow Aldborough	8			2		0	8		2		2				6	Site in multiple ownerships, development would require relocation of existing businesses. Planning permission for two dwellings but remainder unlikely to be available within five years.
вастоз	Land adjacent to Beach Road, Bacton	20	20				0	20		0						20	A Local Housing Association is in discussion with the land owner and the Planning Authority but no application has been made so too early to include in deliverable supply.
PF/15/1221	Land off Priory Crescent and Walsingham Road, Binham					28	14	14		14	14						Housing Association scheme where development has commenced and is programmed for completion 2019/2020
PF/88/1996 PF/17/1265	Land at Hall Street, Briston					64	45	19		19	0	9	10				New full permission for 19 units -17/1265. Necton Management confirm completion within five years.
BRI02	Land West of Astley Primary School, Briston	30					0	30		0						30	Allocated site with some early discussions with Regional House Builder but no application yet made so to early to include in deliverable 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. Development has commenced.
CAT01	Land off Lea Road, Catfield	15					0	15		0						15	Small site in private ownership with some interest from local Housing Association but no application made so to early to include in deliverable supply.
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.
09/0826	Burnt Hills, Cromer					13		13		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					106	75	31		0						31	31 remaining units as part of base consent for 106 dwellings. Delivery of remaining 31 would require relocation of existing commercial use .No sign of recent activity so not included with five year supply.

			Plann	ing Stat	us		Bui	ild Informatio	n		As	sessm	ent of	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
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		20			10	10		0	Development recommenced in 2019. Necton Management confirm completion within five years.
C01	Land adjacent to East Coast Motors, Beach Road, Cromer	40					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 17/0751 PO/ 18/1779	Land at rear of Sutherland House, Overstrand Road, Cromer	60	68		68			68		68		24	22	22			Site is owned by local development company, is allocated for development and has full planning permission. Site works commenced early 2018 PO/ 18/1779 - Revised Layout (decision date 01/05/2019)
C07 13/0451 14/0863	Land at Jubilee Lane / Cromer High Station, Cromer	40				8	8	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).
ROS4	Land South of Louden Rd.	20						20		0						20	No current interest in developing this site
C14 13/0247	Land West of Roughton Road, Cromer	160				145	98	47	10	47	20	20	7				Site has full planning permission and is under construction, a substantial number of units have been started and completed. 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	22		22					Development commenced early 2019 and will be completed within five years
15/1461	Land off Eagle Road, Erpingham					24		24	24	24	24						Site visit May 2018. All 24 Under construction - Completion date August & October 2019 (Handover)
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.
F01 950 Units 23.75 ha	Land North of Rudham Stile Lane, Fakenham. Remaining Allocation	768		950				950		205				75	130	745	These three sites all lie within the F01 allocation in the Site Allocations
F01 (Picken) PO/14/1212 PM/17/1183	Land North of Rudham Stile Lane, Fakenham				78			78		78	30	30	18				Development Plan. Trinity college have applied for outline planning permission for 950 dwellings and will market the site once consent is in olace. 101 dwellings are under construction on the Places for People site.

			Plann	ing Stat	us		Bu	ild Information	n		A	sessm	ent o	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
F01 (Places for People) PF/15/1167	Land North of Rudham Stile Lane, Fakenham					101	35	66		66		32	34				The Picken site has full permission for 78 units and is under construction by a national housebuilder.
F05 10/0109 08/1324	Land between Holt Road & Greenway Lane, Fakenham	60-90					38	22		14	14					30	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.
НАР07	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	80	70	22	70	30	30	10				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 19, Sites under development.
H01 PM/15/0804	Land West of Woodfield Road, Holt	100			85	83		83	3	83			30	30	23		Reserved Matters Planning Approval has been granted to Norfolk homes who are currently seeking a variation to the permission.
H09 PM/16/1204	Land at Heath Farm / Hempstead Road, Holt	200			215	213	59	154	18	154	46	59	38	11			Site has full Planning Permission and development has commenced. Projected delivery rates confirmed by Lovell Homes
H12	Land off Hempstead Road	70						52		52			22	30		0	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 EOT 31/07/2019.
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.
PO/15/0539	Land to the north of Tilia Business Park, Tunstead Road, Hoveton				28			28		0						28	Outline planning permission granted. Site is available and suitable for development. Reserved Matters application is pending but no clarity in relation to commencement dates.

			Plann	ing Stat	us		Bu	ild Information	1		As	sessm	ent of	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
PF/17/1675	Land off School Close, Knapton					14		14		14			7	7			Affordable rent & Shared ownership housing being delivered by Housing Association. Process of discharging conditions on-going. Programmed for completion within five years housing. Not yet commenced.
SN01 14/1249 18/0334	Land at junction of Holt Road & Kettlestone Road, Little Snoring	20			20	20		20		20		5	5	5	5		Reserved matters planning permission granted. Site is available and suitable for development and has been purchased by a house builder who indicates relatively low build out rates over three to five years.
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 and is being marketed. 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					31	9	23		0						23	Extant planning permission but no recent progress. No units included within five year supply.
MUN06 PF/15/1534	Land at Grange Cottage / Water Lane, Mundesley	40				44	31	13	13	13	13						Site has planning permission and development commenced during 2017. Completion expected in 2019/20.
NW01 (part of site) PF/13/0866	Land at Norwich Road / Nursery Drive, North Walsham	176				176	168	8	6	8	6	2					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	62	38	36	38	36	2					Site has full planning permission for 100 dwellings and development commenced early 2017. Developer (Persimmon Homes) confirm approx 40 completions per year with completion well within the five year period
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.

			Plann	ing Stat	us		Bu	ild Information	n		As	sessm	ent o	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
17/0579 PF/18/1089	29 New Road, North Walsham					48		48		48	48						48 retirement living apartments for the elderly including communal facilities, landscaping, car parking and ancillary development. Under construction and nearing completion
NW25 PF/17/1951	Land off Laundry Loke, North Walsham	10				43		43		43		15	28				Housing Association site to deliver 43 dwellings. Full planning application PF/17/1951 determined 01/02/2019. Development has commenced
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.
PF/17/1435	Land at Queensway, North Walsham					16		16		16		16					Supported living apartments.
OVS03 18/0179	Land at rear of 36 Bracken Avenue, Overstrand	6				4		6		4	2	2				2	Has full planning permission, conditions discharged. Commenced March 2019
PM/14/0854 75.001	Hillingdon Park, Overstrand					35	29	6		6		4	2				Ten plots remained from an earlier development scheme, of these four have been completed, leaving 6 to be built. Work started again on site during 2018
ROU03/10 PO/14/0986 PM/19/0359 - Pending	Land at Back Lane, Roughton	30			30			30		30		15	15			0	Reserved Matters application awaiting decision.
10/0295	39 - 52 Renwick Park, West Runton					10		9		4		1	1	1	1	5	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.

			Plann	ing Stat	us		Bui	ild Information	1		As	sessm	ent of	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
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. Development has commenced
PF/14/0644	Land at Seaview Crescent, Sheringham					11	5	6		6		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.
	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.
15/0001 17/1774	Former Hilbre School, Sheringham				40	32	14	18	15	18	15	3					Site has full planning permission and is under construction.
17/0468	Formerly The Shannocks, 1 High Street, Sheringham					10		10		10				5	5		Demolition of existing hotel and erection of mixed use building comprising 10 dwellings (Use Class C3) and 4 commercial units
20071919 PF/10/0869 17/1434	Old Baker's Yard, High Street, Stalham					17	8	9		9		9					Site has full planning permission and the remaining 9 units are expected to be completed during 2020/21.
17/1524	Slaughter House, Upper Staithe Road, Stalham					42		42		42			12	30			Retirement living housing. 30 retirement living apartments and 12 retirement bungalows. The Developer, historically, develop their sites quickly and therefore could potentially deliver the site within 5 years.
SOU02	Land West of Long Lane, Southrepps	10						10		0						10	Some interest from Housing Association but no permission as yet so not included in supply
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 is not currently available.
17/0729 - Pending	RAF West Raynham, Massingham Road, West Raynham			94				94		94		35	35	24			Resolution to grant full planning permission. Commencement expected shortly following completion of Section 106.
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
BLA04/A	Land East of Langham Road, Blakeney	30														30	Proposed Allocations 2016/36

			Plann	ing Stat	us		Bui	ild Information	1		As	sessm	ent of	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
BRI01	Land East of Astley School, Briston	40														40	Proposed Allocations 2016/36
BRI02	Land West of Astley School, Briston	40														40	Proposed Allocations 2016/36
C07/2	Land at Cromer High Station , Cromer	22														22	Proposed Allocations 2016/36
C10/1	Land at Runton Road / Clifton Park, Cromer	90														90	Proposed Allocations 2016/36
C16	Former Golf Practice Ground, Overstrand Road, Cromer	180														180	Proposed Allocations 2016/36
C22/1	Land West of Pine Tree Farm, Cromer	300														300	Proposed Allocations 2016/36
F01/B	Land North of Rudham Stile Lane, Fakenham	560														560	Proposed Allocations 2016/36
F10	Land South of Barons Close, Fakenham	35 - 55														55	Proposed Allocations 2016/36
F03	Land at Junction of A148 and B1146, Fakenham	65														65	Proposed Allocations 2016/36
Н04	Land South of Lodge Close, Holt	70 - 100														100	Proposed Allocations 2016/36
H17	Land North of Valley Lane, Holt	27														27	Proposed Allocations 2016/36
H20	Land at Heath Farm, Holt	200														200	Proposed Allocations 2016/36
HV01/B	Land East of Tunstead Road, Hoveton	150														150	Proposed Allocations 2016/36
LUD01/A	Land South of School Road, Ludham	10 - 20														20	Proposed Allocations 2016/36
LUD06/A	Land South of Grange Road, Ludham	10- 20														20	Proposed Allocations 2016/36

			Plann	ing Stat	us		Bui	ild Information	n		As	sessm	ent of	deliv	ery		Comments
Site reference	Location	Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2019	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2019/20	2020/21	2021/22	2022/23	2023/24	Beyond March 2023	
NW01/B	Land at Norwich Road & Nursery Drive, North Walsham	350														350	Proposed Allocations 2016/36
NW62	North Walsham Western Extension, North Walsham	1800														1800	Proposed Allocations 2016/36
MUN03/A	Land off Cromer Road & Church Lane, Mundesley	50														50	Proposed Allocations 2016/36
SH04	Land adjoining Seaview Crescent, Sheringham	45														45	Proposed Allocations 2016/36
SH07	Former Allotments, Weybourne Road, Adjacent to Splash, Sheringham	40														40	Proposed Allocations 2016/36
SH18/1B	Land South of Butts Lane, Sheringham	50														50	Proposed Allocations 2016/36
ST19/A	Land Adjacent Ingham Road, Stalham	70														70	Proposed Allocations 2016/36
ST23/2	Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	80														80	Proposed Allocations 2016/36
W01/1	Land to Rear of Market Lane, Wells-next-the-sea	20														20	Proposed Allocations 2016/36
W07/1	Land Adjacent Holkham Road, Wells-next-the-sea	60														60	Proposed Allocations 2016/36
Total from small si	al from small sites (under 10 dwellings which already have planning permission)							710		710	96	137	160	177	143	61	748 units with planning permission minus 37 not built within five year period minus 10% lapse rate.
Windfall	ndfall				N	I/a				540	0	135	135	135	135		Based on the delivery of 135 units per year as windfall development commencing in year 2. See Appendix A for detailed justification.
										2747	400	500	650		440	5045	1

406 683 652 566 443 6015