

Neighbourhood Plans – Indicative Housing Requirements Methodology

July 2021

Background

This note sets out the Council's approach to providing an indicative housing requirement to those Qualifying Bodies who wish to plan for housing in their Neighbourhood Plans, beyond that which is planned for in the Local Plan, and who ask the Council for an indicative housing requirement. The methodology in the note will also apply to the full extent of a Neighbourhood Area where it extends into the Broads Executive Area, within which the Broads Authority is the local planning authority. This methodology has been produced with input from the Broads Authority.

National Policy Context

In relation to establishing housing requirements in Neighbourhood Plans, paragraphs 66 and 67 of the 2021 National Planning Policy Framework (NPPF) state:

66. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

67. Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

Where a housing requirement for a Neighbourhood Area has not been set in the Local Plan, paragraph 67 is relevant. The East Suffolk Council - Suffolk Coastal Local Plan (September 2020) sets housing requirements for a number of Neighbourhood Areas that were designated at the time of plan preparation. This note applies to requests for housing numbers for other Neighbourhood Areas.

The <u>Planning Practice Guidance on Neighbourhood Planning</u>¹ (PPG) provides further guidance (see Appendix 1 to this note).

Whilst guidance is contained in the PPG, there is no nationally set methodology for identifying indicative housing requirements for Neighbourhood Plan areas.

Neighbourhood Plans are not required to plan for housing, however when doing so Qualifying Bodies² may request a housing figure from the Council. Where this figure has not been set in a strategic policy in an adopted Local Plan, this requirement is 'indicative' and will need to be tested at the Neighbourhood Plan Examination. It is therefore crucial that any indicative housing requirement is fully justified.

Whilst the local planning authority could choose to not provide a Qualifying Body with a housing requirement, the Council has a statutory duty to support the production of Neighbourhood Plans and also considers it is good practice to provide a housing requirement figure where this is requested. As well as supporting Qualifying Bodies, this also enables a consistent approach across East Suffolk.

Plan-area-wide housing requirements for the Suffolk Coastal and Waveney Local Plan areas have been established through the Local Plans. Housing requirements for the part of the Broads within the former Waveney district have also been established within the Broads Local Plan.

Where a Neighbourhood Plan chooses to plan for additional housing growth, the indicative housing requirement does not need to be met in total through allocations, and policies which support windfall housing development could form part of the approach in a Neighbourhood Plan. It should be noted however that where Neighbourhood Plans look to benefit from paragraph 14 of the NPPF in terms of housing land supply they will be expected to include allocations in accordance with the NPPF and the PPG.

¹ https://www.gov.uk/guidance/neighbourhood-planning--2

² I.e. Town or Parish Councils or Neighbourhood Forums.

The purpose of this methodology paper is to set out how the Council will assess an indicative housing requirement for Neighbourhood Plan areas, when asked to do so.

Adopted Local Plans

The East Suffolk Council - Suffolk Coastal Local Plan was adopted on 23rd September 2020 and the East Suffolk Council - Waveney Local Plan was adopted on 20th March 2019. The Broads Local Plan was adopted on 17th May 2019.

The East Suffolk Local Plans contain strategies to meet the housing requirements identified for the Plan period, and both contain contingencies (i.e. allocate more housing than is needed) to provide confidence that the housing requirements will be met. However, Town and Parish Councils may aspire for growth above that which the Local Plan expects to come forward within their communities and both the Suffolk Coastal and Waveney Local Plans provide some specific scope for additional growth to come forward.

The Suffolk Coastal Local Plan sets out housing requirements for the plan period (2018-2036) for those areas with a designated Neighbourhood Plan area at the time of production of the Final Draft Local Plan (which was approved by the former Suffolk Coastal District Council in January 2019 for publication and submission). Housing requirements for these areas are set out in Policy SCLP12.1 Neighbourhood Plans of the adopted Local Plan, as shown in Appendix 2 to this note. Policy SCLP12.1 also acknowledges that other Neighbourhood Areas will be designated and states "Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development."

The Waveney Local Plan, having been prepared prior to the publication of the 2019 NPPF, does not set out housing requirements for designated neighbourhood areas. However, the Plan is supportive of the production of Neighbourhood Plans and is supportive in principle of Neighbourhood Plans planning for housing growth. Policy WLP1.1 Scale and Location of Growth states "Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy." Policy WLP1.2 Settlement Boundaries states "Neighbourhood Plans can make minor adjustments to settlement boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall distribution strategy outlined in Policy WLP1.1 and would not be contrary to the other policies of this Local Plan."

For Neighbourhood Areas in the 'countryside', the strategies of the Local Plans expect limited growth to come forward and as such the indicative housing requirement for these areas will be zero, unless there are specific local factors that warrant an alternative

approach. Policies may set out local support for housing development that is in general conformity with the policies for housing in the countryside.

The Broads Local Plan was also prepared prior to the 2019 NPPF and does not contain housing requirements for Neighbourhood Areas. It is not expected that additional new housing will be planned for within the Broads through Neighbourhood Plans. This is because the more rural parts of a parish tend to be within the Broads. There are also constraints such as landscape impact, distances from services and flood risk.

Neighbourhood Plans are required to be in general conformity with the strategic policies of the relevant Local Plan in order to meet the basic conditions and proceed to referendum.

It is advised that early discussion takes place between the Qualifying Body and the Council to discuss the aims of planning for housing and the issues the Qualifying Body are seeking to address.

Methodology

There is no nationally set methodology for assessing indicative housing requirements for Neighbourhood Plan areas. East Suffolk Council and the Broads Authority have therefore considered practise from elsewhere, and relevant parts of the NPPF, PPG and Local Plan policies in developing a methodology.

The following table sets out the considerations and assessments that will be made when the Council is asked to provide an indicative housing requirement to a Qualifying Body. The process is not solely a calculation as there are a range of factors to consider, in accordance with the NPPF and the PPG.

The Planning Practice Guidance states that the local authority's 'local housing need' can form the starting point, however due to the recent adoption of Local Plans which contain strategies to meet housing requirements and set out, in policy, the overall approach to additional growth in Neighbourhood Areas, the Local Plan strategy is considered to form an appropriate starting point. However, the authority's local housing need, as calculated through the Government's standard methodology, will change over time and could be a factor that needs to be considered through the production of the Neighbourhood Plan. The reference to current local housing need figures is therefore included in the methodology table alongside the housing requirement that the Local Plans are planning for, for reference.

In order to identify an initial starting point which reflects the strategy of the Local Plan, a proportionate increase on the level of growth already planned for in the Neighbourhood Area should be calculated. This is to be done through reference to the contingency provided for in either the Suffolk Coastal Local Plan or the Waveney Local Plan. The contingency is the level of growth planned for in the Local Plans over and above the housing requirement. It is important to note that this is a starting point, and the methodology allows for

consideration of other local issues or the aspirations of the Town/Parish Council in arriving at an indicative figure.

The contingency provided for by housing allocations in the Suffolk Coastal Local Plan is 16.5% and in the Waveney Local Plan is 12%, before windfall is factored in³. Although the contingency itself represents growth that is already allocated, applying this percentage increase acts as a reasonable starting point for identifying a level of additional growth that would be consistent with the strategy of the Local Plan. This will provide a figure which can then be 'tested' against a range of considerations and revised and refined accordingly as necessary.

As an example of using this as a starting point, if a Neighbourhood Area in Waveney is anticipated to deliver 100 dwellings in the Local Plan period (based on completions since the start of the Plan period, existing permissions, and allocations as set out in the Local Plan) the starting point for an indicative housing requirement for the Neighbourhood Plan would be 12 dwellings as this is 12% more.

To test whether this figure is appropriate or should be increased or decreased, a number of qualitative factors should be considered. This approach reflects paragraphs 101 and 102 of the PPG (see Appendix 1) which advocates an approach of balancing needs with protection and taking into consideration spatial policies. The focus is on whether this level of growth is likely to be able to be accommodated and whether it is appropriate, i.e. are there any 'showstoppers' or absolute constraints. Considerations around mitigating impacts and identifying appropriate locations for growth are the remit of preparing the Neighbourhood Plan, and therefore it is expected that the considerations set out in the table, such as environmental constraints and infrastructure, would be revisited in the preparation of the Plan including in cases where no 'showstopper' constraints have been identified.

Whilst it is for Qualifying Bodies to choose whether to plan for housing or not, the PPG (paragraph 103) states that neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. As the Local Plans contain strategies to meet, and exceed, the housing requirements for the Local Plan areas, the provision of additional housing figures to Neighbourhood Plan areas should be seen as providing an opportunity for an appropriate level of additional growth. In this respect the figures are not intended as minimums or maximums but as an indication of the level of the approximate level of growth that could be planned for. The Council will however expect Qualifying Bodies who have asked for an indicative housing requirement to take a positive approach towards planning for it. For Qualifying Bodies who wish to meet the requirements of paragraph 14b) of the NPPF, indicative housing requirements need to be met in full and Neighbourhood Plans will need to include allocation(s), although a policy on windfall allowance may form a part of the approach.

Engagement between the Council and Qualifying Bodies will be vital during the process of establishing the indicative housing requirement, and the Council would like this to be a two-

³ The Broads Local Plan also contains a contingency, of 10.5%

way process with the Qualifying Body inputting on local information / matters that may be relevant.

Legislation requires that Neighbourhood Plans are screened for Strategic Environmental Assessment and Appropriate Assessment during their preparation. Should these assessments indicate constraints on planning for the indicative housing requirement, if necessary the indicative housing requirement could be revisited as a result.

A proforma is contained in Appendix 3. The Council will use the proforma to assess an indicative housing requirement for a Neighbourhood Plan area when asked to do so.

Criteria and considerations to be applied in identifying an indicative housing requirement		
Local Plan Strategy		
Growth identified in Local Plan	The Local Plans set out how much growth is expected to come forward in each settlement over the plan period. In the Suffolk Coastal Local Plan this is set out in Table 3.5. In the Waveney Local Plan this is set out for each of the towns and the Larger Villages and Smaller Villages.	
Percentage of total growth above based on Local Plan contingency	For Neighbourhood Areas in Suffolk Coastal Local Plan area multiply figure above by 1.165 (16.5%) For Neighbourhood Areas in Waveney Local Plan area (including those that fall within the Broads) multiply figure above by 1.12 (12%)	
Position in Settlement Hierarchy	Consideration should be given to what type of contribution to the housing requirement the Neighbourhood Area will be expected to make in terms of its position in the Settlement Hierarchy.	
	For Neighbourhood Areas in the 'countryside', the Local Plans expect limited growth to come forward and as such the housing requirement for these areas will be zero, unless there are specific local factors that warrant an alternative approach. Policies may set out local support for housing development that is in general conformity with the policies for housing in the countryside.	
Local Plan Strategy	What is the overall strategy of the Local Plan for the Neighbourhood Plan area (or a wider area in which is sits)? This should be a detailed explanation with reference to specific policies.	
Population of the Neighbourhood Area	Population of the Neighbourhood Area taken from the latest ONS population projections, as a percentage of the Local Plan area population. This will not directly inform the figure but can form part of the consideration of the requirement in the conclusions below.	
Current Local Housing Need figure	Include most recent local housing need figure for the Local Plan area, as calculated under the national standard methodology, alongside housing requirement of the relevant Local Plan for reference.	

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	Local needs		
Local needs for housing identified through a local housing need assessment where relevant	A local housing needs survey may have been undertaken by the Qualifying Body. This may contain evidence of needs for specific types of housing or for the quantum of housing in the Neighbourhood Area. This should be considered in view of the information identified in terms of the Local Plan's strategy for the area – is there likely to be a need that will not be met through the Local Plan policies?		
Constraints			
Environmental designations and assets	 Special Protection Areas and Special Areas of Conservation (note a Habitats Regulations Assessment carried out as part of the production of the Neighbourhood Plan would consider potential harm to the integrity of these sites – for the purposes of establishing an indicative housing requirement consideration should be given to the location of these sites and any relevant conclusions in the HRA for the Local Plan). Sites of Special Scientific Interest (SSSIs) The Broads Areas of Outstanding Natural Beauty Scheduled monuments Listed Buildings Conservation Areas Listed Parks and Gardens National Nature Reserves The purpose of considering these is not to identify every possible impact but to consider whether the nature, location or scale of any designations or assets is likely to impact on the scale of growth that could be achieved. 		
	Consideration to be given to the extent and location of any areas of flood zone 2 and 3 and whether this is likely to have an impact on the scale of growth that could be achieved. Coastal erosion should also be considered for coastal Neighbourhood Areas.		
Infrastructure capacity	Consideration to be given to infrastructure which may present an absolute constraint on development for the plan period, or would require a scale of growth inconsistent with the strategy of the Plan to address issues. This will require consultation with the relevant infrastructure providers where other up to date evidence is not available or existing evidence needs to be verified. This could include: Highways capacity (Suffolk County Council) Education (Primary, Secondary, Further) and Early Years provision (Suffolk County Council) Water supply and waste water treatment (Anglian Water and Essex and Suffolk Water)		

Indicative Housing Based upon the above a qualitative and quantitative reasoning	Other issues and local information Conclusions	Other infrastructure which may be less likely to present an absolute constraint on growth, but which may nevertheless require consideration in the preparation of a Neighbourhood Plan, includes: • Health • Utilities • Police • Libraries • Community Centres • Household Waste Recycling Centres • Green Infrastructure Where constraints exist but these are thought to be possible to overcome through mitigation the housing requirement will not need to be adjusted. Through the production of the Neighbourhood Plan the Qualifying Body will be expected to engage further with infrastructure providers where relevant in relation to the site assessment and the identification of any infrastructure requirements. Opportunity for Qualifying Body to identify any relevant information on aspirations, local issues or other factors that could be taken into account. Any other identified constraints. This may include the supply of suitable sites if a robust site assessment process has already been carried out as part of the production of the Plan, however site assessment should be viewed as a separate exercise and be informed by the indicative housing requirement.
Requirement should be provided.	Indicative Housing Requirement	Based upon the above a qualitative and quantitative reasoning should be provided.

Net housing permissions granted since the date of the data contained in the adopted Local Plans, that is not on an allocated site, can be counted towards meeting the requirement. This figure will be provided by the Council.

How the Council will apply this approach

- The Council will provide an indicative housing requirement to a Qualifying Body, upon request.
- The Council will apply the methodology set out in this Note when assessing a housing requirement. The Council will liaise with the Broads Authority where a Neighbourhood Area falls partly within the Broads.
- The Council will usually provide a draft figure within 6 weeks of a request, and will keep the Neighbourhood Plan group informed of any deviation from this.

- The Council will discuss the draft figure with the Qualifying Body.
- The Council will support the Qualifying Body in any consideration of the housing requirement through the Examination process as appropriate.
- The Council, with relevant stakeholders, will keep the methodology under review, in particular to reflect any Examiner's conclusions and changes in national policy or guidance.

Appendix 1 – Extract from Planning Practice Guidance

Can a neighbourhood plan come forward before an up-to-date local plan or spatial development strategy is in place?

Extract...

Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.

Paragraph: 009 Reference ID: 41-009-20190509

How should a housing requirement figure be set for designated neighbourhood areas?

The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies. While there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the Housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area.

Within the administrative area of a National Park, the Broads Authority or a Development Corporation (where planning powers are conferred), each local planning authority should set a housing requirement figure for the proportion of the designated neighbourhood area which is covered by their administration.

Paragraph: 101 Reference ID: 41-101-20190509

How should local planning authorities identify indicative housing requirement figures for designated neighbourhood areas, when these are needed?

Where an indicative housing requirement figure is requested by a neighbourhood planning body, the local planning authority can follow a similar process to that for providing a housing

requirement figure. They can use the authority's local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area.

Proactive engagement with neighbourhood plan-making bodies is important as part of this process, in order for them to understand how the figures are reached. This is important to avoid disagreements at neighbourhood plan or local plan examinations, and minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted.

Paragraph: 102 Reference ID: 41-102-20190509

How should neighbourhood planning bodies use a housing requirement figure that has been provided to them?

Where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make.

Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale. Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies. For example, whether the scale of proposed increase has a detrimental impact on the strategic spatial strategy, or whether sufficient infrastructure is proposed to support the scale of development and whether it has a realistic prospect of being delivered in accordance with development plan policies on viability. Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information.

When strategic housing policies are being updated, neighbourhood planning bodies may wish to consider whether it is an appropriate time to review and update their neighbourhood plan as well. This should be in light of the local planning authority's reasons for updating, and any up-to-date evidence that has become available which may affect the continuing relevance of the policies set out in the neighbourhood plan.

Paragraph: 103 Reference ID: 41-103-20190509

Are housing requirement figures for neighbourhood areas binding?

The scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set out a housing requirement figure for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites to accommodate the requirement (which may have already been done through the strategic policies or through non-strategic policies produced by the local planning authority). The strategic policies will, however, have established the scale of housing expected to take place in the neighbourhood area.

Housing requirement figures for neighbourhood plan areas are not binding as neighbourhood planning groups are not required to plan for housing. However, there is an expectation that housing requirement figures will be set in strategic policies, or an indicative figure provided on request. Where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan. Where it is set as an indicative figure, it will need to be tested at examination.

Paragraph: 104 Reference ID: 41-104-20190509

What happens if the local planning authority does not provide a housing requirement figure for a designated neighbourhood area that wishes to plan for housing?

Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the 'basic conditions'.

Paragraph: 105 Reference ID: 41-105-20190509

Appendix 2 – Housing requirements under Policy SCLP12.1 of the Suffolk Coastal Local Plan

Policy SCLP12.1: Neighbourhood Plans

The Council will support the production of Neighbourhood Plans in identifying appropriate, locally specific policies that are in general conformity with the strategic policies of this Local Plan.

Where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the minimum housing requirements set out below:

Neighbourhood plan area	Minimum number of dwellings ⁴
Aldringham cum Thorpe	Existing Local Plan allocation of 40 dwellings, plus small scale additional
	development and windfall
Bredfield	20
Earl Soham	25
Easton	20
Framlingham	100 in addition to allocations in 'made' neighbourhood plan
Great Bealings	Housing development as per countryside policies
Kelsale cum Carlton	20
Kesgrave	20
Leiston	100 in addition to allocations in 'made' neighbourhood plan
Martlesham	20. This is in addition to allocation Policy SCLP12.25.
Melton	Existing Neighbourhood Plan allocation of 55, plus windfall
Playford	Housing development as per countryside policies
Rendlesham	Existing Local plan allocations of 100, plus windfall
Saxmundham	Small scale additional development and windfall. This is in addition to Local
	Plan allocation Policy SCLP12.29 which allocates land for the South
	Saxmundham Garden Neighbourhood which will deliver approximately 800
	dwellings ⁵ .
Wenhaston with Mells	25
Hamlet	
Wickham Market	70
	This is in addition to Local Plan allocation Policy SCLP12.60 (in Pettistree
	Parish, adjoining Wickham Market)

Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development.

Should the housing growth identified for Neighbourhood Plans not be delivered, the Council will address this through a future Local Plan review.

⁴ In addition to existing permissions, allocations and dwellings with resolution to grant (as at 31.3.18). See Table 3.5.

⁵ The South Saxmundham Garden Neighbourhood is within the Benhall Parish and Saxmundham.

Appendix 3 – Proforma for assessing the housing requirement for a Neighbourhood Area

Neighbourhood Area	
Name of Neighbourhood Area	
Area covered by	XX Parish
Neighbourhood Area	
Neighbourhood Plan period	This is relevant to determining the proportionate number of
	years for a housing requirement.
Relevant Local Plan	Waveney or Suffolk Coastal
	Broads Local Plan for any that are partly within the Broads
Local Plan Strategy	
Growth identified in Local Plan	Enter figures below
Completions (within plan	
period, as set out in Local Plan)	
Permissions as at start of plan	
period	
Allocations in Local plan	
Total	
Percentage of total growth	In Suffolk Coastal this is 16.5%
above based on Local Plan	In Waveney this is 12%
contingency	,
Position in Settlement	Taken from the relevant Local Plan
Hierarchy	,
Local Plan Strategy	Explanation of the relationship of the Neighbourhood Plan area
J	to the strategy of the Local Plan, including relevant policies
Population of the	Taken from the latest Census, as a percentage of plan area
Neighbourhood Area	population
Current Local Housing Need	For relevant Local Plan area, as calculated using the standard
figure	method
Local needs	
Local needs for housing	Where evidence of local housing need has been undertaken as
identified through a local	part of the preparation of the Neighbourhood Plan, consider
housing need assessment	whether there are likely to be local needs that would not be met
where relevant	through the Local Plan.
Constraints	-
Environmental designations	Explain whether and how this would affect achievement of the
_	figure identified above
	Include flood risk
Infrastructure capacity	Explain whether and how this would affect achievement of the
, ,	figure identified above
Other local issues and	Explain whether and how this would affect achievement of the
information	figure identified above
Conclusions	
Indicative Housing	Housing requirement as a figure, proportionate to the
Requirement	Neighbourhood Plan period.
	Provide justification based upon the evidence above.

Permissions granted since base	This will count towards meeting the housing requirement
date of data in Local Plans on	
unallocated sites	