

Housing Action Plan

Identifying actions to support the delivery of new housing

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Contents

Summary	4
1 Introduction.....	7
Background	7
Purpose and scope of this action plan	10
The East Suffolk Area Profile	12
Methodology.....	14
Suffolk Coastal Local Plan	16
Waveney Local Plan	18
Neighbourhood Plans	21
Forecasting delivery	22
Housing delivery in 2019-20	25
Housing delivery in 2020-21	26
Identifying Issues across East Suffolk.....	27
2 The Impact of Covid-19 on Housing Delivery	28
The COVID-19 pandemic.....	28
Impacts of COVID-19 restrictions on the construction industry.....	28
Legislative support for the construction industry.....	30
Impacts of COVID-19 on the construction industry in East Suffolk	31
Impact of Covid-19 on housing delivery in East Suffolk.....	32
Impact of Covid-19 on East Suffolk Council’s own housing development.....	34
Financial and business support administered by East Suffolk Council	36
Impact of Covid-19 nationally on Local Planning Authorities.....	37
Support provided by the East Suffolk Planning and Building Control Service	37
3 Housing Delivery Analysis	41
Analysis of time spent determining applications.....	41
Analysis of length of time from consent to work starting on site	42
Analysis of sites that take a long time to start work on-site	45
Impact of new legislation on applications	47
Analysis of size of sites.....	47
Impact of new Infrastructure on housing delivery	49
A Review of the East Suffolk Planning Service	52
Attracting housebuilders to East Suffolk	56

4 Key Actions & Reponses.....	57
Delivering Planned Growth.....	57
Actions	59
5 Delivery and monitoring of the Housing Action Plan.....	63
Future Housing Actions Plans and Housing Delivery Tests.....	63

Summary

- i. East Suffolk Council first produced a Housing Action Plan in 2019. This second Housing Action Plan for East Suffolk reports on progress and delivery made over the past year on actions identified in the first Housing Action Plan and identifies new challenges that have arisen.
- ii. The Housing Delivery Test was introduced by the Government in 2018 and assesses how successful each Local Authority has been at supplying the required number of houses in the previous three financial years. In Local Planning Authority areas where less than 95% of the required housing has been delivered over the past three years, authorities must produce a Housing Action Plan. In those areas where less than 85% of the requirement was delivered there is an additional requirement to apply a 20% buffer in calculating 5-year land supply, and where less than 75% is delivered the 'presumption in favour of sustainable development' would also apply in decision making. The Government intends to publish the results of the Housing Delivery Test in November each year (for the past three full financial years) and transitional arrangements mean that the requirements outlined above are being phased in over the period up to November 2020. The transitional arrangement, as set out in Annex 1 of the National Planning Policy Framework, is the 'presumption in favour of sustainable development' being applied to 2018 Housing Delivery Test results below 25% and 2019 Housing Delivery Test results below 45%. A 'presumption in favour of sustainable development' is applied to Housing Delivery Test result below 75% from 2020 onwards. The purpose of a Housing Action Plan, as set out in paragraph 75 of the National Planning Policy Framework, is to assess the causes of under-delivery and identify actions to increase delivery in future years.
- iii. The first set of Housing Delivery Test results, covering the period 2015/16-2017/18, were published in February 2019 and relate to the areas covered by the Council's Local Plans: the result for the former Suffolk Coastal area was 128% and the result for the former Waveney area was 72%. The Housing Delivery Test result required no action to be taken by the former Suffolk Coastal area and the former Waveney area to produce a Housing Action Plan and apply a 20% buffer when calculating the 5-year land supply.
- iv. The second set of Housing Delivery Test results, covering the period 2016/17-2018/19, were published in February 2020 and also relate to the areas covered by the Local Plans: the result for the former Suffolk Coastal area is 127% and the result for the former Waveney area is 89%. The Housing Delivery Test result requires no action to be taken by the former Suffolk Coastal area and the former Waveney to produce a Housing Action Plan. The improvement in the result to 89% brings the former Waveney area out of the requirement to apply a 20% buffer when calculating the 5-year land supply (a 5% buffer is to be applied instead).
- v. Following the publication of both the 2018 and 2019 Housing Delivery Test results no further action was required for the former Suffolk Coastal area, and a Housing Action Plan was required for the

former Waveney area. As both areas are now within East Suffolk, and in view of the corporate objectives surrounding housing delivery and the desire to ensure strong delivery is maintained across East Suffolk, the Housing Action Plan covers the whole of East Suffolk local planning authority area.

- vi. East Suffolk Council is in a positive position in terms of setting out its planned approach to housing delivery, with the Local Plan for the former Suffolk Coastal area at an advanced stage in its examination and anticipated for adoption in late summer 2020, and the Local Plan for the former Waveney area having been adopted in March 2019. The two new Local Plans set ambitious targets for housing delivery, along with site allocations and policies to bring development forward. In the former Waveney area the Local Plan has sought to address previous reasons for under delivery in the Local Plan with a range of site allocations that exceed the minimum level of housing needed by approximately 12%.
- vii. The Council maintains a proactive approach to housing delivery with progress made on several initiatives since the publication of its first Housing Action Plan in August 2019. Significant progress has been made on the Suffolk Coastal Local Plan, recruitment to the Major Sites and Infrastructure Team, preparation and consultation on development brief templates for small sites, and work to further improve the development management service through producing and consulting on a new Local Validation List. The actions detailed in the Housing Action Plan are focused on improvements to procedures in the Planning Service, policy implementation, and monitoring of the new and emerging Local Plans and the site allocations within them. The Council has, alongside taking forward the actions in the Housing Action Plan, published a Housing Enabling Strategy which will act alongside the Housing Action Plan in guiding the Council's wider actions to support and facilitate housing delivery.
- viii. Under the Planning Practice Guidance, the former Suffolk Coastal and Waveney areas will be assessed under the Housing Delivery Test as a single planning authority from 2020 onwards.
- ix. Whilst some sites in the new Local Plans are expected to come forward in the short term, others will take longer to deliver, and the Housing Action Plan will not have an immediate influence on the Housing Delivery Test results. The expectation is that the 2020 Housing Delivery Test will result in over 100% for the East Suffolk area with no action required.
- x. The impacts of the Covid-19 pandemic present a new challenge nationally and locally to the economy and to housing delivery. The 2021 Housing Delivery Test result will include the period most affected by the Covid-19 pandemic (2020/21) as some construction sites temporarily closed and others are delivering housing at a slower than previously expected rate. This Housing Action Plan therefore also investigates the initial impact of Covid-19 on the construction industry in East Suffolk.

- xi. Regardless of future Housing Delivery Test results, East Suffolk intends to produce an annual Housing Action Plan as a tool to 'check' the progress and success of actions to secure housing delivery and enable the Council to take early steps to minimise any future risk of under delivery.

1 Introduction

Background

- 1.1 The first [East Suffolk Housing Action Plan](#) was published in August 2019 and this second Housing Action Plan reports on progress made in the last year and the new challenges that have arisen due to the Covid-19 pandemic.
- 1.2 East Suffolk Council was created on 1st April 2019 comprising the areas formerly covered by Suffolk Coastal and Waveney Districts. East Suffolk Council is committed to delivering new housing to meet identified needs and to increase the mix of housing available, including affordable housing. Since the publication of the 2019 Housing Action Plan, the Council has made great advances in setting out its approach to housing delivery. The Housing Action Plan sits alongside East Suffolk Council's [Strategic Plan](#) (2020-2024), [Housing Development Strategy](#) (2020-2024), [Housing Strategy](#) (2017-2023) and [Housing Enabling Strategy](#) (2020-2025). The Strategic Plan, agreed in early 2020, sets the corporate objectives for East Suffolk: growing our economy, enabling our communities, remaining financially sustainable, delivering digital transformation, and caring for our environment.¹ One of the priorities set out under 'Growing our economy' is to 'Build the right environment for East Suffolk' which includes having the right supply of housing. Delivery of housing is therefore a key part of the new Council's ambition.
- 1.3 The Housing Enabling Strategy, approved in May 2020, integrates the work of a number of teams within the Council (Housing, Planning, Asset Management, Communities and Economic Development and Regeneration) and sets out the Council's ambitions for housing delivery over the coming years and sets specific actions to take forward between 2020 and 2025.
- 1.4 The Housing Development Strategy, approved in January 2020, sets out the Council's approach to building more housing, with its overarching objective being to 'meet housing need by providing high quality sustainable housing at affordable rents or sale values and to develop appropriate housing solutions in all areas of East Suffolk which are effective and cost efficient'. It seeks to "improve our residents' quality of life by building new homes" and "identifies a broad need for new affordable homes for rent"².

¹ <https://www.paperturn-view.com/uk/east-suffolk/strategic-plan-2020-2024?pid=Nzg78875&v=1.1>

² <https://www.eastsuffolk.gov.uk/assets/Housing/Housing-Development-Strategy.pdf>

- 1.5 The above plans sit alongside the Council's existing Housing Strategy which seeks over the six year period from 2017-2023 to increase the amount of Council owned affordable housing to more than 5,100 homes, increase the overall number of affordable homes in East Suffolk by 250 units per annum, and intervene to deliver the Kirkley Waterfront and Sustainable Urban Neighbour development³.
- 1.6 The Local Plan for the former Waveney area⁴ (excluding the area covered by the Broads Authority) was adopted in March 2019 and a new Local Plan for the former Suffolk Coastal area⁵ is well advanced with adoption anticipated for late summer 2020. The new Local Plans contain site allocations and policies to deliver the new housing needed.
- 1.7 The Council's ambition is reflective of the Government's drive to boost housing supply, as reflected in the National Planning Policy Framework (NPPF). Revisions to the NPPF in 2018 introduced the Housing Delivery Test as a means by which to measure past housing delivery at the local planning authority level. The Housing Delivery Test measures the delivery of housing over the past three years against the housing requirement and calculates this as a percentage figure, as set out in the Housing Delivery Test Measurement Rule Book⁶. The Government intends to publish the results in November each year. The results of the Housing Delivery Test are applied as follows:
- the publication of an action plan if housing delivery falls below 95%;
 - a 20% buffer on a local planning authority's 5-year land supply if housing delivery falls below 85%; and
 - the presumption in favour of sustainable development if housing delivery falls below 75%, once transitional arrangements have ended⁷.
- 1.8 Where a housing action plan is to be produced, paragraph 75 of the NPPF states that this should assess the causes of under-delivery and identify actions to increase delivery in future years. The NPPF and accompanying Planning Practice Guidance are not prescriptive in terms of the content and scope of a Housing Action Plan, however the Planning Practice Guidance

³ <https://www.eastsuffolk.gov.uk/assets/Housing/East-Suffolk-Housing-Strategy-2017-2023/East-Suffolk-Housing-Strategy-2017-23.pdf>

⁴ <https://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/>

⁵ <https://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/>

⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf

⁷ A transitional period is set out Annex 1 of the NPPF under which the presumption in favour of sustainable development will apply where the Housing Delivery Test results published in November 2018 indicates that delivery was below 25%, the Housing Delivery Test results published in November 2019 indicates that delivery was below 45% and the Housing Delivery Test results published in November 2020 and subsequent years indicate that delivery was below 75% (note that the 2018 and 2019 results were published in the following February).

does provide a list of the aspects that a local authority could review and the actions that a local planning authority could consider.⁸

- 1.9 The second set of Housing Delivery Test results were published in February 2020⁹. Using the calculations set out in the Housing Delivery Test Rule Book (which includes transitional arrangements) the following results are published for the former Suffolk Coastal and Waveney areas:

LPA	Number of homes required ¹⁰				Number of homes delivered ¹¹				HDT result
	2016-17	2017-18	2018-19	Total	2016-17	2017-18	2018-19	Total	
Suffolk Coastal	465	392	502	1,359	550	582	588	1,720	127%
Waveney	313	299	370	983	243	295	335	873	89%

Fig. 01 2019 Housing Delivery Test results published February 2020

- 1.10 There is therefore a requirement under the NPPF to produce a Housing Action Plan for the area formerly covered by Waveney District, where the Housing Delivery Test has identified that delivery has been below 95%. Planning Practice Guidance advises that ‘any authority may produce an action plan as a matter of good practice to identify ways to support delivery.’¹² The first Housing Action published in 2019 took the approach that as the two areas are within East Suffolk, in view of the corporate objectives surrounding housing delivery and to ensure that the strong recent record of delivery is maintained in the former Suffolk Coastal area, the housing action plan would cover the full East Suffolk local planning authority area (note this is excluding the Broads Authority area). This second Housing Action Plan adopts the same approach of producing a plan for the full East Suffolk local planning authority area.

⁸ 050 Reference ID: 68-050-20190722 and 051 Reference ID: 68-051-20190722, with link to <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test--action-plans>.

⁹ <https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>

¹⁰ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

¹¹ Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test: 2019 Measurement Technical Note published alongside the results

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865156/HDT_Technical_Note_2019.pdf

¹² Planning Practice Guidance Paragraph: 048 Reference ID: 68-048-20190722 Revision date: 22July 20109

Purpose and scope of this action plan

- 1.11 This document represents the Council's Housing Action Plan as required in paragraph 75 of the NPPF. The production of the Plan has focused on causes of under delivery identified in the 2019 Housing Action Plan and analysing whether they are still valid, reporting on progress made against actions identified in the 2019 Housing Action Plan, identifying new causes of under delivery of housing that have arisen, how this relates to planned growth and identifying actions to address these issues. The housing requirements for East Suffolk are set out below:
- Former Suffolk Coastal area: 542 dwellings per year, anticipated through the emerging Suffolk Coastal Local Plan.
 - Former Waveney area: 374 dwellings per year, as set out in the Waveney Local Plan (2019)
- 1.12 The Housing Action Plan plays an important role in identifying actions to help to deliver these requirements. Alongside this, it is important to acknowledge that in addition to delivering this quantity of housing, Local Plan policies also reflect the needs for a mix of housing, the provision of affordable housing and for housing to be sustainable, and it is essential that these objectives are also delivered.
- 1.13 The East Suffolk Housing Strategy 2017-23 sets out a strategy to address housing needs, particularly the need for affordable housing. The five areas of focus include 'increasing the supply of new housing to meet a range of needs – a more proactive role for East Suffolk supporting the development of affordable homes.
- 1.14 The Housing Action Plan sits alongside the Council's Housing Enabling Strategy (2020-2025) and Housing Development Strategy (2020-2024). The Housing Enabling Strategy was produced jointly by the Housing and Planning services, with input from other areas of the Council, and sets out the corporate approach to increasing housing delivery, setting out a range of actions including the use of the Council's assets to meet the aims of the housing strategies, engaging with a wider range of developers, supporting community led housing and the role of the Council in the delivery of rural exception sites.
- 1.15 The Housing Development Strategy details the Council's commitment and approach to building and acquiring properties and land in East Suffolk. The Council is now playing an active role in acquiring and developing sites for housing. The actions include a commitment to review corporately all Council owned land ownership to identify potential development sites for new Council housing and to develop a three year rolling development programme to achieve 50+ units per annum.

- 1.16 This Housing Action Plan therefore focuses on actions that are specific to planning, however identifies linkages with wider corporate objectives and actions where relevant.
- 1.17 The Council separately publishes a Housing Land Supply Statement each year, to meet the requirements of paragraph 73 of the NPPF in relation to identifying and updating annually a supply of specific deliverable sites to provide a minimum of five years' worth of housing against their housing requirement. The Housing Land Supply Statement to identify the supply of deliverable sites for housing for the five years between 1st April 2020 and 31st March 2025 is currently being finalised.
- 1.18 Whilst the purpose of the Plan is to identify the causes of under-delivery and to set out actions to address these, it is relevant to acknowledge that recent actions that the Council has taken in the past year since the publication of the 2019 Housing Action Plan won't yet be reflected in the 2019-20 housing completion figures.

The East Suffolk Area Profile

- 1.19 East Suffolk Council was officially created on 1st April 2019. The former Waveney and Suffolk Coastal District Councils had been working closely since 2008 under a shared Chief Executive. The formation of the single Council was the result of a great deal of work including a new constitution, new scheme of delegation, new committee structures, new procedure rules and codes of practice and protocols, new budgets, and six Parliamentary Orders. Waveney previously had 48 councillors and Suffolk Coastal 42 councillors. Following the restructure, 29 new wards were created and elections held on 2nd May 2019 for 55 new East Suffolk councillors.
- 1.20 The former Waveney and Suffolk Coastal areas have much in common in terms of geography and their socio-economic characteristics and are therefore natural partners. Through working together in partnership there is an increased efficiency and sharing of resources that has resulted in considerable savings being made.

Geography

- 1.21 The majority of East Suffolk is rural in character covering approximately 487 square miles with a coastline of 78.9km. East Suffolk has a total of 423 designated nature conservation sites which cover 47,224ha, 50 Conservation Areas¹³, and approximately 4,100 listed buildings¹⁴. With exceptional natural, historic and built environments the district is therefore a popular destination for visitors from the UK and abroad.

Population

- 1.22 East Suffolk Council is the largest District Council in England by population with 246,913 people. There are no cities in Suffolk and the largest towns in East Suffolk are, in order of size, Lowestoft, Felixstowe and Kesgrave. There are a high proportion of older people in East Suffolk. Over 65s make up 26.8% of the total population in East Suffolk compared to 18.1% across England. East Suffolk together with the rest of Suffolk is projected to have an increasing aging population in the coming years.

Housing

- 1.23 The affordability ratios for housing show, that over the twenty year period from 1998-2018, average house prices have increased at a faster rate than average earnings resulting in houses becoming less affordable.

¹³ <https://www.eastsuffolk.gov.uk/planning/design-and-conservation/conservation-areas/conservation-area-appraisals/>

¹⁴ <https://www.eastsuffolk.gov.uk/planning/design-and-conservation/listed-buildings/>

Year	Suffolk Coastal	Waveney	England
1998	3.57	3.69	3.54
2003	6.31	5.57	5.91
2008	7.00	7.24	6.69
2013	7.03	6.54	6.76
2018	10.07	7.49	8.00

Fig. 04 Affordability ratios¹⁵

- 1.24 The overall medium affordability ratio for East Suffolk in 2019 was 7.85¹⁶. In the former Suffolk Coastal area the average house price had risen 1.1% from £293,011 in January 2019 to £296,092 in January 2020. In the former Waveney area the average house price had risen 3.8% from £194,048 in January 2019 to £201,439 in January 2020¹⁷. East Suffolk is experiencing a similar housing affordability crisis to the rest of the UK, but it is particularly acute in the former Suffolk Coastal area.

¹⁵ House price to workplace based earnings ratio, [ONS 2019](#)

¹⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

¹⁷ <https://www.gov.uk/government/publications/uk-house-price-index-england-january-2020/uk-house-price-index-england-january-2020>

Methodology

- 1.25 There is no set methodology for the production of a Housing Action Plan however the Planning Practice Guidance (Housing Supply and Delivery) sets out factors that local planning authorities could review and actions that local planning authorities could consider.
- 1.26 The Planning Advisory Service has produced tools to assist planning authorities in producing action plans, and the Council has referred to these for guidance. The Council has also actively participated in workshops held in 2019 and 2020 by the Planning Advisory Service to learn from others and ensure that it is developing effective action plans.
- 1.27 The methodology that East Suffolk Council has followed is summarised below. The Council has taken a proportionate approach that allows each Housing Action Plan to be read as an independent document whilst also seeking to avoid unnecessary repetition of the information provided in the previous Housing Action Plan. It is focused on developing its understanding of the historic, current and potential future issues affecting delivery.
- 1.28 The starting point for the Council has been that within the former Suffolk Coastal area, the Housing Delivery Test has been passed. In relation to the former Waveney area, the starting point has been that the Local Plan is one year old, and the Council has sought to understand how it can best act to deliver the growth identified. In this respect, the Council is starting from a positive position, and the Housing Action Plan will seek to reinforce and strengthen this.
- 1.29 The Council annually publishes a Housing Land Supply Statement, setting out the number of years supply of land for housing that is available. Since 2019 the Council has been seeking more information on deliverability from developers, landowners and agents. In June 2020 the Council also considered it important to gain an understanding of the impacts of the Covid-19 pandemic on the development of specific sites that are allocated, have planning consent or are under construction. This information was gathered through questionnaires and analysis has informed this Housing Action Plan and the Housing Land Supply Statement.
- 1.30 The methodology and approach is described below.
- 1.31 This 2020 Housing Action Plan seeks to build on the previous 2019 Housing Action Plan and the aims set out in the Waveney Local Plan and emerging Suffolk Coastal Local Plan:
- The Housing Action Plan explains the approach in the adopted Waveney Local Plan to changing the strategy for delivery and addressing past under-delivery;
 - The Housing Action Plan considers the approach in the emerging Suffolk Coastal Local Plan to establishing a strategy which aims to deliver the housing needed.

- A summary of the issues identified in the 2019 Housing Action Plan are provided for reference as they remain relevant and provide context to housing delivery.

1.32 To update and enhance the Council's understanding of the deliverability of the new Local Plans, information gathering and analysis has been undertaken as set out below:

- Analysis of impacts of Covid-19 nationally on the construction industry and on Local Planning Authorities;
- Analysis of impacts of Covid-19 on housing development in East Suffolk and the support provided during the pandemic by East Suffolk Council;
- An update of analysis of planning processes and stages of housing delivery, revisiting the analysis in the 2019 Housing Action Plan.

1.33 Linked to the analysis above, actions are then identified, considering those areas where there is likely to be the biggest impact. These can be categorised as follows:

- Actions related to the Planning Service
- Actions related to the monitoring and review of the Housing Action Plan.

1.34 The Council has undertaken targeted engagement as part of the production of the Housing Action Plan as follows:

- Contact with developers / landowners in relation to individual sites, through the production of the Housing Land Supply Statement;
- Internal consultation has taken place with the Building Control, Housing, Economic Development and Regeneration, and Development Management.

1.35 Mechanisms for reviewing and monitoring the Housing Action Plan have been identified, related to the actions.

Suffolk Coastal Local Plan

1.36 The new Suffolk Coastal Local Plan was submitted to the Secretary of State for Examination in March 2019. Hearings were held in August and September 2019 and consultation on Main Modifications has recently been carried out between May and July 2020. The Local Plan is therefore well progressed through the Examination and is expected to be adopted in late summer 2020.

Current spatial strategy

1.37 Currently the adopted strategy for housing delivery is set out in the Core Strategy and Development Management Policies (2013), which set a target of 465 dwellings per year over the period 2010 to 2027, although the Council accepts that this requirement is now considered to be out of date.

1.38 Over the period 2010 – 2016, sites for housing development largely came forward as windfall sites, owing to the lack of housing allocations in the Suffolk Coastal area. The Council proactively supported sustainable development on unplanned sites which boosted the 5 year supply of land for housing from 4.3 years in 2014¹⁸ to 9.3 years in 2018¹⁹. However more recently, to deliver the approach set out in the Core Strategy, the Council has adopted a Site Allocations and Area Specific Policies DPD (January 2017) and the Felixstowe Peninsula Area Action Plan (January 2017). A number of the sites allocated in these plans have received planning permission and are now being developed.

1.39 A number of undeveloped site allocations from the Site Allocations and Area Specific Policies DPD and the Felixstowe Peninsula Area Action Plan DPD have been taken forward into the new Suffolk Coastal Local Plan, which is expected to be adopted in late summer 2020. Most of the dwellings currently forming the committed supply, i.e. sites with planning permission or existing allocations, are on greenfield sites. As at 31st March 2019, out of 6,527 dwellings currently committed, 717 are on previously developed land, made up of a combination of small and medium size sites, with the largest being for 66 dwellings (which is almost complete) and a similar sized site for 59 dwellings not yet started.

1.40 Housing delivery in the area has exceeded set annual targets since 2015/16.

¹⁸ <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Housing-Land-Availability/Land-Supply-Assessment-2014.pdf>

¹⁹ <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Housing-Land-Availability/Housing-Land-Supply-Statement-June-2018.pdf>

The future housing strategy: the new Suffolk Coastal Local Plan

- 1.41 The emerging Local Plan identifies the housing requirement for the period 2018 – 2036. It is anticipated that the Local Plan when adopted will contain a housing requirement of 542 dwellings per year, reflecting local housing need as per the Government’s standard methodology at the time of submission of the Local Plan. The emerging Plan sets out a strategy which focuses on the A12 / A14 and railway corridor including the development of two new Garden Neighbourhoods at Saxmundham and Felixstowe and a number of site allocations in rural areas. Under the requirement of 542 dwellings per year the strategy identifies sites to meet the residual need of 2,758 dwellings, plus provide a 16.5% contingency on top of this, and policies to support an anticipated windfall delivery of 800 dwellings over the plan period. The approach is to provide a diversity of supply of sites. Within the former Suffolk Coastal area, delivery over the past four years has exceeded the housing requirement, and the Council is therefore confident that the requirement in the emerging Local Plan will be met.
- 1.42 Suffolk County Council has been awarded its £19.5 million Housing Infrastructure Fund (HIF) bid to support the delivery of 2000 homes at Brightwell Lakes. East Suffolk Officers have been working very closely with the County Council, the land owner and Homes England to collaboratively achieve a successful award of funding. This funding will enable the delivery of the extensive highway improvements earlier and in a closer sequence with this funding. Without the funding the significant cost of up front infrastructure would delay housing delivery and the HIF funding would now allow the developer to repay the funding to the County Council as the development builds out. Critical in this funding bid is also funding for delivery of the Boulevard allowing access through to the approved new secondary and primary school so that this essential facility can be brought forward as soon as possible. Certainty in such substantial school delivery is essential to make this new community sustainable and attractive to a diverse range of housebuilders in its early phases. East Suffolk’s role in this demonstrates its commitment to all stages of the planning and delivery process to boost the supply of housing and infrastructure.

Waveney Local Plan

Previous spatial strategy

- 1.43 The 2019 Housing Action Plan provided detailed analysis of the housing delivery in the former Waveney area from the 1990s to present day.
- 1.44 Waveney had a successful delivery of houses during the 1990s and 2000s. The Suffolk Structure Plan (2001) set the requirement for a total of 6,700 new homes to be delivered at an average annual rate of 335 dwellings a year over the period 1996 to 2016. By 2005 Waveney had delivered 3,465 new homes at an average annual rate of 385 dwellings a year. Off the back of this success an ambitious plan was devised in the Core Strategy (2009). This strategy has influenced the delivery figures which are reported in the Housing Delivery Test and it is therefore important to explain the implementation of this strategy.
- 1.45 The spatial strategy and site allocations in Waveney targeted challenging sites in the centre of Lowestoft and around the harbour that would bring significant community benefits once regenerated. This strategy was in accordance with National Policy and Regional strategies (2008) that aimed to target previously developed land. It also reflected the priority regeneration status of Waveney District in the East of England Plan (2008)²⁰. The focus on the regeneration of town centres and brownfield sites within the town boundaries and a ‘squeeze’ on greenfield development meant that towns were not expected to physically grow significantly in size.
- 1.46 The previous spatial strategy and Planning Policies were contained in the Waveney Core Strategy (January 2009), Development Management Policies (January 2011), Site Specific Allocations (January 2011), and Lowestoft Lake Lothing & Outer Harbour Area Action Plan (January 2012).
- 1.47 The key plans in the Waveney Local Development Framework were finalised and adopted in early 2009 and early 2011 and 2012 when the impacts of the recession were taking hold on the economy and affecting land values particularly in the Lowestoft area. The recession and the impacts were not widely anticipated. The economic climate made bringing forward brownfield sites even more challenging, made it difficult for small and medium housebuilders to operate, and made it difficult to attract a range of housebuilders to Lowestoft and the Waveney area. Over the plan period, a greater proportion of houses than anticipated came forward in villages and a lower proportion than anticipated came forward in Lowestoft where 70-80% of growth was expected.

²⁰ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Core-Strategy.pdf> page17

Current spatial strategy

- 1.48 The adopted Waveney Local Plan (March 2019) housing requirement is the objectively assessed need as calculated through the Strategic Housing Market Assessment under the 2012 NPPF. The Strategic Housing Market Assessment identified a need for 8,223 new homes over the plan period of 2014-2036 which equates to 374 homes a year. The Waveney Local Plan aims to exceed this minimum target by providing 9,235 new homes during the plan period, excluding any expected contribution from windfall development. This represents a significant increase and challenge.
- 1.49 The new Local Plan acknowledges that future housing needs cannot be met on the limited number of remaining brownfield sites which have proven to be more challenging and slower to develop than previously expected. The new Local Plan takes forward previously allocated sites where possible and feasible, and also allocates new greenfield sites for housing development. There is a reduced dependence on growth in central Lowestoft. Larger allocations include a new Garden Village to the north of Lowestoft, a mixed use development in Carlton Colville/Gisleham to the south of Lowestoft, and a new Garden Neighbourhood on the southern edge of Beccles/Worlingham. There is an increase in emphasis on sustainable development and growth in rural areas through site allocations in villages and new planning policies that actively support small windfall developments in rural areas. The new approach to housing delivery in the Waveney area is reflected in the 2019 Housing Land Supply Statement which shows a strong housing land supply of 6.58 years.²¹ The 2019 housing land supply includes a 20% buffer required by the 2019 Housing Delivery Test result.
- 1.50 The Waveney Local Plan was adopted in March 2019 providing limited time and information to fully assess the effectiveness of the new spatial strategy in delivering housing. However, monitoring of housing delivery will be undertaken as the Plan is implemented.

The Kirkley Waterfront and Sustainable Urban Neighbourhood

- 1.51 The Kirkley Waterfront and Sustainable Urban Neighbourhood is commonly referred to as the Lake Lothing site and is allocated under Policy WLP2.4 in the Waveney Local Plan. The allocation is the largest brownfield site in Lowestoft located in the heart of the town. It is approximately 60 hectares of land in multiple ownership, in various uses and containing numerous vacant industrial buildings. The allocation is for 1,380 new dwellings, a primary school, retail centre, Marine facilities, and employment land.

²¹ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Monitoring-Information/Five-Year-Supply-of-Land-for-Housing/083-Statement-of-housing-land-supply-March-2019.pdf>

- 1.52 The site has outline planning permission on the westerly part for 1,180 homes, a retail centre, leisure facilities and a primary school.²² The easterly part of the site has been developed with new offices for Essex and Suffolk Water, East Suffolk Council and Suffolk County Council.
- 1.53 The Council is committed to the development of Kirkley Waterfront and Sustainable Urban Neighbourhood. Representatives of various service areas in East Suffolk Council including Economic Development and Regeneration, Housing, and Planning and Coastal Management are collaborating to progress the site. Various site development options are available and being considered following the approval of the Lake Lothing Third Crossing and Lowestoft Flood Defence scheme receiving funding.

Lowestoft Town Centre Master Plan

- 1.54 The Lowestoft Town Centre masterplan is being prepared by East Suffolk Council's Economic Development and Regeneration Team to inform the regeneration of the town centre. The masterplan is prepared in the context of changes in the way people shop and spend their leisure time and the impact of the Covid-19 pandemic. The masterplan sets a clear vision and aspiration, giving confidence to businesses, funders, consumers, and investors in Lowestoft. The strategy includes improving the overall appeal of the town centre as a place to live, as well as shop, work and spend leisure time.
- 1.55 The masterplan includes the regeneration of numerous sites across Lowestoft that could provide new homes as single use or as part of mixed-use development of a site. Clapham car park is proposed as a new mixed-use care/ retired living facility. The Custom House and QD site are proposed as a mixed-use development with a hotel, restaurant, retail units, apartments and terraced houses. The former Post Office is proposed for redevelopment with a restaurant/ pub, retail units, apartments, and new mews houses at the back of the site. 18 Bevan Street East/ Denmark Road offers the opportunity for leisure/ restaurants and up to 8 new homes. The former hospital site is proposed for a mixed-use development including a care facility, new homes, a shop and new public park. The former Tesco site is proposed for apartments new mews houses.
- 1.56 The Lowestoft Town Centre Master Plan is available to view here:
<https://www.eastsuffolk.gov.uk/business/regeneration-projects/ltdcm/>

²² Waveney Local Plan 2019. Page 55.

Neighbourhood Plans

- 1.57 Nine Neighbourhood Plans have been made across East Suffolk with a further 31 having had the Neighbourhood areas designated with work progressing but at various stages. As reported in the 2019 Housing Action Plan the Council continues to support Neighbourhood Plan groups through the provision of guidance, advice and technical input as well as through meeting the Council's statutory functions related to the production of a Neighbourhood Plan.
- 1.58 In the former Suffolk Coastal area Neighbourhood Plans are expected to be proactive in delivering housing as set out in the emerging Local Plan. Some 'made' Neighbourhood Plans, such as Framlingham and Leiston have already allocated 105 and 390 dwellings respectively. Neighbourhood Plans for Kesgrave and Bredfield are at an advanced stage of preparation having recently concluded their Examinations.
- 1.59 The Waveney Local Plan (2019), unlike the emerging Local Plan for the former Suffolk Coastal area, does not set out housing requirements for designated neighbourhood plan areas. The former Waveney area has two 'made' Neighbourhood Plans, Kessingland Neighbourhood Plan and Mutford Neighbourhood Plan. The Kessingland Neighbourhood Plan allocates 3 new sites with a total of 105 new dwellings, and contains housing policies to support affordable housing and residential infill and backland development. Neighbourhood Plans for Beccles, Bungay, Halesworth, Southwold and Worlingham are at an advanced stage of development with public consultations completed, underway or imminent. The Reydon Neighbourhood Plan is at an advanced stage of preparation having recently concluded its Examination. None of these Neighbourhood Plans include housing land allocations. However, it is expected that Neighbourhood Plans will support the strategy set out in the Local Plan and will contribute positively towards the delivery of housing, which may include appropriate site allocations.
- 1.60 The status of Neighbourhood Plans and details on how to apply for a Neighbourhood Area designation are available on the East Suffolk website at:
<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/>
Guidance on how to prepare a Neighbourhood Plan can be found at:
<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/>

Forecasting delivery

- 1.61 The Planning Advisory Service (PAS), through workshops, strongly encourages Local Planning Authorities to forecast future delivery with a view to anticipating when the Council will 'pass' the annual Housing Delivery Test. Forecasting likely future results would enable the Council to understand the measures that are likely to apply in the future and to take this into account when considering appropriate actions.
- 1.62 Whilst data that underpins the calculation of the Housing Delivery Test will change over time, the Council can usually anticipate completions with some confidence, based upon the housing trajectories set out in the Statement of Housing Land Supply. The Council considers it helpful to consider the likely future outcomes where possible in order to be informed of any potential future implications of the results.
- 1.63 The 2020 Housing Delivery Test Result for the period April 2017 – March 2020 can be forecast with some accuracy using housing completion data that has been collected.
- 1.64 Beyond the 2020 Housing Delivery Test Result there are unprecedented uncertainties caused by the Covid-19 pandemic and its impact on the economy, construction industry and housing market that cannot be anticipated at this time. In the absence of any information to the contrary, it should be assumed that the annual Housing Delivery Tests will continue with the same method of calculating the annual housing need figure and the same consequences for under delivery to Local Planning Authorities.
- 1.65 Under the Housing Delivery Test Rule Book, where the latest adopted housing requirement figure is less than five years old, the housing delivery test uses the lower of either the latest adopted housing requirement figure or the minimum annual local housing need figure (calculated under the standard methodology). Where the adopted housing requirement is over five years old, the minimum annual local housing need figure will be used. The Housing Delivery Test includes transitional arrangements for measuring delivery for the financial years 2016-17 and 2017-18, to allow time for the test to become established, where the minimum annual housing need figure, calculated under the standard methodology, is replaced by the household projections. Where the minimum annual local housing need figure applies, the Housing Delivery Test Rule Book states that this should be calculated with a base date of 1st April and should use the affordability ratio from the previous year.
- 1.66 The 2019 Housing Delivery Test results, as published by the Government in February 2020, are as follows:

LPA	Number of homes required ²³				Number of homes delivered ²⁴				HDT result
	2016-17	2017-18	2018-19	Total	2016-17	2017-18	2018-19	Total	
Suffolk Coastal	465	392	502	1,359	550	582	588	1,720	127%
Waveney	313	299	370	983	243	295	335	873	89%

Fig. 02 2019 Housing Delivery Test results published in February 2020²⁵

- 1.67 The 2020 Housing Delivery Test results, due to be published by the Government in November 2020, are expected to assess East Suffolk as one local planning authority in accordance with the Planning Practice Guidance²⁶.
- 1.68 The 2020 Housing Delivery Test results can be anticipated with some accuracy as the completions figures and housing need figures are known.
- 1.69 The net additional dwellings completed in 2019-20 in the former Suffolk Coastal area are 660 which is over the housing need calculated through the standard methodology for the 2019-20 year. In the former Waveney area 159 dwellings were completed, which is below the target of 374 dwellings a year. In total 819 homes were delivered in East Suffolk in 2019-20. The combined housing delivery target in the two Local Plans is 910 dwellings a year.

LPA	Number of homes required				Number of homes delivered				2020 HDT result
	2017-18	2018-19	2019-20	Total	2017-18	2018-19	2019-20	Total	
Suffolk Coastal	392	502	542	1436	582	588	660	1830	127%
Waveney	299	370	374	1043	295	335	159	789	76%
East Suffolk	691	872	910	2,473	877	923	819	2619	106%

Fig. 03 2020 Housing Delivery Test forecast for East Suffolk

- 1.70 The forecast delivers a positive result for East Suffolk overall of over 100%. The result will mean there is no requirement to produce a Housing Action Plan or take other measures following the publication of the 2020 result. Nevertheless, the Council has made a commitment to produce an annual Housing Action Plan for the East Suffolk local planning

²³ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

²⁴ Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test: 2019 Measurement Technical Note published alongside the results https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865156/HDT_Technical_Note_2019.pdf

²⁵ The government calculates the number of housing completions in a slightly different manner to Local Planning Authorities, particularly in relation to communal accommodation such as nursing homes. This results in a small differences between the figures reported in the Council's Annual Monitoring Reports (AMR) and the figures in the government's Housing Delivery Test results.

²⁶ Planning Practice Guidance, Paragraph: 046 Reference ID: 68-046-20190722 <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test>

authority area, regardless of the results of future annual Housing Delivery Tests, as a means of monitoring progress on actions and outcomes around housing delivery and ensuring that it is actively supporting planned housing delivery and the implementation of the Local Plans.

Housing delivery in 2019-20

- 1.71 The housing completion figures for East Suffolk for 2019-20 will form part of the Housing Delivery Test calculation for the years 2020 (April 2017 – March 2020), 2021 (April 2018 – March 2021) and 2022 (April 2019 – March 2022).
- 1.72 Housing delivery in the former Suffolk Coastal area has exceeded set annual targets since 2015-16. The housing completion figures for the former Suffolk Coastal area for 2019-20 are particularly encouraging, representing a further increase on the positive outcomes from recent years at 660 dwellings.
- 1.73 The Statement of Housing Land Supply (March 2019) identified 7.03 years of housing land supply available. The Statement of Housing Land Supply identified 587 new dwellings that may come forward on 'deliverable' sites in 2019-20. This figure excluded windfall development and was below the actual completion figure of 660 new dwellings for the year 2019-20. The Statement of Housing Land Supply considers 4,001 new dwellings capable of being delivered in following five years, which represents an over provision of 1,155 dwellings. The forecast for future housing delivery in the former Suffolk Coastal area therefore remains consistently strong.
- 1.74 The housing completion figures for 2019-20 for the former Waveney area are however below expectations. The Waveney Local Plan set an annual target of 374 dwellings a year. The latest data shows 159 homes were completed, equating to 43% of the annual target. All four quarters of the year delivered lower rates with an acute drop in the third quarter.
- 1.75 The Statement of Housing Land Supply (March 2019) identified a 6.58 year supply of land for housing. The Statement of Housing Land Supply identified that 220 new dwellings may come forward on 'deliverable' sites in 2019/20. These would consist of dwellings on major sites (of 10 or more units) with outline planning permission/ resolution to grant subject to Section 106, major sites (of 10 or more units) with full planning permission, small sites (below 10 units) with planning permission and C2 residential institutions. Due to the different size and location of sites with planning consent there is no clear reason for the under delivery in 2019/20. A contributing factor could be the limited number of house builders operating in the former Waveney area. However, the Statement of Housing Land Supply identified that supply would be likely to increase over the five years and therefore the positive effects of the Waveney Local Plan are likely to become more significant over time. Nevertheless, the Council will need to ensure that it places a particular focus on ensuring that development comes forward in the former Waveney area.

Housing delivery in 2020-21

- 1.76 Housing completions in East Suffolk for the period April 2020 – March 2021 will be impacted by the Covid-19 pandemic and the associated lockdown restrictions in place from March 2020 onwards. Whilst legislation did not require construction sites to close, the pandemic resulted in many businesses temporarily closing sites while they carried out risk assessments and put in place safety precautions to protect staff and visitors to sites. Developers have noted that Covid-19 restrictions have resulted in fewer staff being able to work on site at any given time causing progress to slow.
- 1.77 Under delivery of housing in a single year will have a negative impact on the Housing Delivery Test results for three years, as each Test considers the cumulative figures from the previous three years. The housing completion figures for East Suffolk for 2020-21 will form part of the Housing Delivery Test calculation for the years 2021 (April 2018 – March 2021), 2022 (April 2019 – March 2022) and 2023 (April 2020 – March 2023).
- 1.78 Due to current uncertainties continued monitoring of housing completions is essential to ensure that the Council is aware of housing delivery rates and can assess on an on-going basis any action required to support housing delivery.

Identifying Issues across East Suffolk

1.79 The Council understands that there are several key possible reasons for the under delivery of housing in the former Waveney area which were identified in the 2019 Housing Action Plan such as;

- the previous dependence on regeneration,
- the high proportion of previous allocated brownfield sites,
- a high dependence on central Lowestoft for growth,
- the impact of the recession on the economy and sale values of new homes in the former Waveney area and especially Lowestoft,
- difficulty in attracting a range of housebuilders to the area,
- slower than expected progress developing key sites in Lowestoft, and
- possible delays in housing delivery due to infrastructure.

1.80 Issues of delivery in the former Suffolk Coastal area are less pronounced as demonstrated by the Housing Delivery Test being passed in that part of East Suffolk. Nevertheless, the Council needs to be mindful of maintaining delivery and in particular that delivery of growth identified in the emerging Local Plan is realised.

1.81 An initial review of national housing policy, strategy and reports carried out in the 2019 Housing Action Plan identified several national issues which appear to potentially be relevant to housing delivery in East Suffolk;

- A dominance of a small number of volume housebuilders that operate within the housing market.
- The housing product produced by some volume housebuilders can only be absorbed into the housing market at a certain rate without affecting local house prices. Builders of homogenous house types will therefore only build at a certain rate, regardless of the number or size of sites allocated or inducements to increase speed of delivery.
- The viability of sites developed by small and medium housebuilders can be more affected by time delays and unexpected costs, as they don't have the resources or cash flow of volume housebuilders.

1.82 The challenge facing East Suffolk in 2020 is the uncertainty created by the Covid-19 pandemic. The impacts on the economy, construction industry and housing market in the coming year and years are currently unknown.

2 The Impact of Covid-19 on Housing Delivery

The COVID-19 pandemic

- 2.1 The Covid-19 virus has caused a global pandemic and the UK Government responded to the emergency by requiring people to stay at home, except for very limited purposes, closed certain businesses and venues, and stopped public gatherings from the 23rd March 2020. The gradual lifting of 'lockdown' restrictions began on the 1st June 2020²⁷.
- 2.2 Timeline of key Covid-19 events in the UK

3 rd March 2020	Government publishes its action plan
23 rd March 2020	People to stay home excepted for very limited purposes.
20 th March 2020	Government announces scheme to pay 80% of wages for employees not working, up to £2,500 a month. ²⁸
26 th March 2020	Lockdown regulations came into force.
11 th May 2020	Department for Business, Energy and Industrial Strategy published Working safely during coronavirus (COVID-19)
1 st June 2020	The Health Protection (Coronavirus, Restrictions) (England) (Amendment No.3) Regulations 2020 comes into force. The prohibitions on leaving home are replaced by a prohibition on staying overnight away from home, with certain specific exceptions.
15 th June 2020	Part of the Health Protection (Coronavirus, Restrictions) (England) (Amendment No.4) Regulations 2020 comes into force allowing retail shops to re-open.
22 nd July 2020	Business and Planning Act (22 July 2020) includes extension of time limits for planning permissions and listed building consents that have lapsed or are due to lapse in 2020, and the ability to apply for changes to construction hours to support safe working practices on site.

Impacts of COVID-19 restrictions on the construction industry

- 2.3 The construction industry was exempt from the lockdown requirement to close that came into force on the 23rd March 2020²⁹, but have nevertheless been impacted by the pandemic.

²⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/883116/Staying_at_home_and_away_from_others_social_distancing_.pdf

²⁸ <https://www.gov.uk/government/speeches/the-chancellor-rishi-sunak-provides-an-updated-statement-on-coronavirus>

²⁹ <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/construction-and-other-outdoor-work>

The construction industry has had to manage the risk of Covid-19 to employees. Businesses of 5 or more employees had to produce a risk assessment and businesses had a duty to consult people on health and safety.

- 2.4 All construction business had to consider who was needed on site, plan for the minimum number of people needed to operate the site safely and effectively and monitor their staff's wellbeing. Business may have been affected by staff or staff family members who were classed as clinically extremely vulnerable or clinically vulnerable therefore advised not to work outside the home and self-isolate or have needed to be offered the safest available on-site roles enabling them to stay 2m away from others.
- 2.5 On the 11th May 2020 the Department for Business, Energy and Industrial Strategy published 'Working safely during coronavirus (COVID-19)' that included guidance on moving around buildings and worksites. 2m social distancing was to be maintained wherever possible, increased handwashing, using screens or barriers to separate people, working back-to-back or side-to-side rather than face-to-face, and reducing the number people each person has contact with. The recommended worksite steps included:
1. *"Reducing movement by discouraging non-essential trips within buildings and sites. For example, restricting access to some areas, encouraging use of telephones or other electronic devices, where permitted, and cleaning them between use.*
 2. *Reducing job rotation and equipment rotation, for example, single tasks for the day.*
 3. *Implementing one-way systems where possible on walkways around the workplace.*
 4. *Using signage such as ground markings or being creative with other objects to help people comply with social distancing guidelines (2m, or 1m with risk mitigation where 2m is not viable), to allow controlled flows of people moving throughout the site.*
 5. *Reducing occupancy of vehicles used for onsite travel, for example, shuttle buses, and when needed, social distancing measures should be followed within the vehicles.*
 6. *Separating sites into working zones to keep different groups of workers physically separated as much as practical.*
 7. *Planning site access and 'area of safety' points to enable social distancing.*
 8. *Reducing the number of people in attendance at site inductions and consider holding them outdoors wherever possible with social distancing.*
 9. *Managing use of high traffic areas including corridors, lifts, turnstiles and walkways to maintain social distancing.*"³⁰
- 2.6 Other recommendations included staggering shift patterns and working hours, increasing vehicle and cycle parking, reduce work related travel, use of Personal Protection Equipment

³⁰ <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/construction-and-other-outdoor-work#outdoors-3-2>

(PPE) such as face coverings, revise pick-up and drop-off collection points for goods entering the site, and consider the frequency of deliveries to site.

Legislative support for the construction industry

- 2.7 The government has provided Planning guidance to accompany the Business and Planning Act (22 July 2020).³¹ Benefits of the legislation to the construction industry include extensions of time limits to unimplemented planning permissions and changes to working hours on construction sites.
- 2.8 Legislation has been put in place to provide opportunities for implementation of planning permissions and listed building consents that lapsed, or will lapse, between 23rd March 2020 and 31st December 2020.
- 2.9 Unimplemented full planning permissions due to lapse between 19th August and 31st December 2020 are automatically extended to 1st May 2021. Applicants do not need to take further action for extension of time to take effect and there is no requirement to obtain Additional Environmental Approval.
- 2.10 Full planning permission that lapsed between 23rd March and 18th August can be extended until 1st May 2021 however this is dependent on the granting of Additional Environmental Approval, which in turn is dependent on the original permission having been subject to Habitats Regulations Assessment or a payment through the Recreation Avoidance and Mitigation Strategy (RAMS) and it is therefore unlikely that this will generate many additional completions.
- 2.11 Listed Building Consents due to lapse between the 23rd March and 31st December 2020 are automatically extended to the 1st May 2021 and are not subject to a requirement to obtain Additional Environmental Approval.
- 2.12 Outline planning permission with time limits for implementation between 19th August and 31st December 2020 are automatically extended to 1st May 2021. Outline planning permission with time limits for implementation between 23rd March and 18th August 2020 are extended to 1st May 2021 if Additional Environmental Approval is granted in respect of the relevant planning permission. Any time limit for the submission of applications for approval of reserved matters which would have expired between 23rd March and 31st December 2020 is extended to 1st May 2021.

³¹ <https://www.gov.uk/government/publications/construction-working-hours-draft-guidance>

- 2.13 Where permission and consent is extended automatically to 1st May 2021 under the Business and Planning Act 2020 written confirmation is not necessary but can be obtained from the Local Planning Authority.
- 2.14 The Business and Planning Act 2020 introduces a fast track deemed consent process for securing changes to construction working hours. The system requires Local Authorities to consider applications in 14 calendar days (excluding public holidays and bank holidays). The system supports developers that need to make changes to site operations to safely work under Covid-19 restrictions.
- 2.15 The Planning and Building Control newsletters available on the East Suffolk Council website provide up to date details on new legislation and the implementation to assist developers, agents and landowners.

Impacts of COVID-19 on the construction industry in East Suffolk

- 2.16 The East Suffolk Building Control service provided initial anecdotal reports on the impact of the Covid-19 on construction industry in East Suffolk. Building Control Officers reported that that all the medium to large developer sites closed temporarily, including those managed by Persimmon, Bloor, and Wellington.
- 2.17 Early conversations between Building Control Officers and site agents and small/medium developers showed that some of the skilled labour professions are in greater demand than usual. This was in part considered likely to there being a shortage of skilled trades in general (even before lockdown). Many sites employ subcontractors and sites closures and delays resulted in some subcontractors furloughing staff. The delayed demand for skilled labour has meant that sites that kept working for longer maintained access to skills which enabled progress and sites which closed are struggling to get subcontracted skilled labour to return from furlough. It was noted that Electricians seem to be very sought after.
- 2.18 Building Control Officers have found that site operations have been smooth and well managed, the site operatives are already highly experienced and responsible with personal protection equipment (PPE), and restrictions have been adopted and implemented well. Site visitors who are less experienced pose a greater challenge which has seen the sites limit access consistently. Smaller sites on occasion have appeared less organised due to the transient nature of the operatives who may pass between the smaller sites whilst subcontracting. Site operatives remain on larger sites for longer, many of them for the entire development, and therefore adopt site measures with a greater understanding and commitment.
- 2.19 Delays or problems due to supply chain or accessing materials will become more apparent in the months ahead. Building Control Officers found many construction professionals are

worried about this and there is concern that larger developers will purchase in bulk which may leave holes within the supply chain for others (particularly small to medium builders). At present the products which appear to be harder to source are finishing materials such as Gypsum plaster and specific timber products.

- 2.20 During the early period of the Covid-19 pandemic plaster has been hard to source and when it was made available there has been bulk buying resulting in excessive price increases and double handling for resale at elevated prices. Building Control Officers were regularly being asked if they knew anywhere with plaster available. Shortages were caused by British Gypsum stopping production due to the lockdown and as plaster is a product which has a use by date it is not stockpiled.
- 2.21 Site inspections were temporarily suspended, however at the beginning of June Building Control Officers were able to undertake completion inspections in unoccupied properties (newly built). During the non-inspection period only a limited number of completions for priority sales were undertaken. Numbers of completions are now growing.

Impact of Covid-19 on housing delivery in East Suffolk

- 2.22 East Suffolk Council carried out an annual Housing Land Supply survey in June and July 2020. Landowners, agents, applicants, and developers were contacted for information regarding the progress of housing delivery on sites allocated within the Local Plans or Neighbourhood Plans, with planning consent or under development. Additional questions regarding the impact of Covid-19 restrictions on development were added to the Housing Land Supply survey. Analysis was carried out on 38 responses, primarily from developers, on sites that are under development or due to deliver completed houses within the next five years. Sites ranged in size from those allocated for 10 dwellings to 850.
- 2.23 The Covid-19 related questions included in the survey were:
1. Have the Covid-19 restrictions resulted in delays in bringing the site forward (other than construction), for example delays to on-site surveys or marketing the site?
 2. What measures have you taken / do you intend to take to address these issues?
 3. Did Covid-19 result in the site being closed, either preventing development from starting or existing construction continuing?
 4. Have Covid-19 restrictions resulted in any on site delays caused by staff issues, such as staff availability/social distancing rules?
 5. Have there been any on site delays due to supply chains and accessing materials?
 6. Has Covid-19 impacted on housing demand, for example sale enquiries, viewings and house sales?
 7. Is the anticipated housing delivery figure provided in question 8 above lower than pre Covid-19 expectations?

8. What do you envisage will be the greatest challenges to the house building industry over the next few months? What are you doing to overcome any challenges for this site?

- 2.24 One of the most notable features of the survey was that the majority of respondents answered no, not applicable, or left answers blank. This indicated that over 50% were not or had not yet experienced delays in bringing a site forward (20 respondents), were not taking any measures to address current or potential future delays (20 respondents) and had not closed the site or been prevented from starting development (23 respondents). Approximately 75% had not found Covid-19 restrictions resulting in on-site delays (28 respondents), or experienced delays due to supply chains or accessing materials (29). Over 50% had not experienced any impact in housing demand (24 respondents), or anticipated change in housing delivery rates (25 respondents).
- 2.25 It should be noted that answers may have been marked not applicable or left blank as they were not relevant to the current stage of development or there is too much uncertainty at this time to be able to provide an answer. Of the sites that were delivering housing or had declared an intention to deliver housing in 2020/21 half had experienced some form of delay (7 out of 14 respondents).
- 2.26 The types of delays to bringing sites forward (other than construction) varied. The two key reasons were delays to surveys being carried out as consultant's staff were furloughed or due to social distancing restrictions (5 respondents), and marketing put on hold due to lack of interest, the ability to show houses, mortgages withdrawn, and market confidence (5 respondents). Other reasons included funding issues, the need to reassess JCT (Joint Contracts Tribunal) Design and Build contracts and delays progressing a S106 agreement.
- 2.27 Various measures were taken by developers to address the issues identified above. Once lockdown restrictions eased discussions resumed with consultants, meetings were held via conference calls, extra personal protection equipment (PPE) was provided to staff on site, home viewings were made by appointment and applicants started working with Planners. Two respondents of small sites of 10 or less in Waveney villages noted they were postponing activity for up to a year and this could be extended if the market does not recover. One developer however noted the market was now extremely active and they were responding to very active enquires. Reduced rates of Stamp Duty Land Tax (SDLT) will apply to residential properties purchased from 8th July 2020 to the 31st March 2021. A developer has noted using the reduction in SDLT as a new marketing feature.
- 2.28 11 construction sites closed or delayed commencement of construction, and a further 4 experienced delays to on-site progress. Reasons for on-site delays included the need to change on-site practices to comply with social distancing. Site closures and on-site delays affected sites of all sizes. Several developers noted the closures lasted six weeks.

- 2.29 8 developers have experienced site delays due to supply chains and accessing materials with one noting it was the biggest issue they were facing.
- 2.30 Over 60% of respondents recorded no issues with housing demand. 6 respondents reported housing demand has slowed with fewer enquiries viewings. Others have noted sales values are holding and that the residential market is very active now that house viewings are permitted again. Several noted that if/ when the housing market slows they consider it is likely to happen next year.
- 2.31 Anticipated housing delivery is considered to be lower than pre-Covid-19 levels by 13 respondents as projects now take longer due to delays and slower progress that has pushed back delivery programs. One developer forecast a 20% reduction in housing delivery over the next five years, and others that delivery numbers would be lower in the first year (2020-21). One developer anticipates that lower delivery in 2020-21 would result in an increase in delivery in 2023-24. Another developer considered delivery slower than planned but expects overall delivery to be the same by the end of the year.
- 2.32 Respondents did not provide consistent answers on the greatest challenges facing the house building industry in the coming months. Key concerns were availability of materials and sales/ values. Challenges facing house building vary from funding, buyers with existing properties to sell, cost of delivery, the ability to react efficiently to changes in lockdown restrictions, availability of finance for buyers, and increases in build costs.
- 2.33 East Suffolk officers have also been engaging closely with other Suffolk LPA's and sharing experiences of Covid-19 impacts and noted housebuilder activity. This is aided by various cross county groups such as the Major Sites Forum. This joint working will also ensure that consistent support can be provided across authorities and learning gained on how best to support housebuilding flexibly.

Impact of Covid-19 on East Suffolk Council's own housing development

- 2.34 East Suffolk Council's Housing Team has a three year rolling development programme which seeks to deliver 50 plus new affordable homes each year to help overcome the shortage of both general and specialist housing in East Suffolk. Where possible these homes are being delivered in areas identified as having the greatest housing need.³²
- 2.35 The Covid-19 pandemic has resulted in delays in site surveys, condition surveys, and defects inspections due to restrictions in place on 'non-essential' travel, and risk assessments which

³² <https://www.eastsuffolk.gov.uk/housing/affordable-housing/building-affordable-housing/>

do not allow for individuals to enter buildings / properties in groups. Initial project meetings have been delayed as these are often done on site as a walk around with the design team.

- 2.36 The East Suffolk Housing Team have made revisions to the programme of delivery to compensate for unavoidably delays. Meetings have been held virtually with the use of existing photos / google earth etc. Visits have taken place following guidelines such as one person enters a building at a time and discussion takes place externally at 2m distances.
- 2.37 Despite measures taken to minimise disruption, the sites at Woodside in Brampton and Monckton Avenue in Lowestoft were both closed for a period of time preventing further construction of the proposed units. The Housing Team have received extension of time requests for completion of developments at Brampton and Monckton. The reason for delay is a combination of site shut down days, delays in the supply chain and prolongation of programmed works following the return to work plan being implemented in accordance with social distancing e.g. the number of trades within individual units are restricted which has added to the time taken to complete the units.
- 2.38 The Housing Team have received feedback from construction partners that has indicated that significant delays have been experienced with supply chains and accessing the materials needed in order to progress development accordingly. As a result, this has slowed progress and impacted anticipated completion dates.
- 2.39 The immediate housing demand has increased due to the Council being required to provide accommodation for all rough sleepers, some of whom would not ordinarily rely on services provided by the council for accommodation. Longer term the Housing Team anticipate the economic impact will increase demand on the Housing Service due to the loss of income for some individuals and families within the district.
- 2.40 The number of houses the Housing Team expected to deliver has not changed. The Team have continued with the programme as planned however some tenures have been re-prioritised to meet the immediate demand as a result of Covid-19 (Houses of Multiple Occupation). However, with reference to the wider housing market across all tenures the Housing Team believe it would be too early to accurately predict the impact of Covid-19 on housing delivery.
- 2.41 The Housing Team anticipate challenges in delivery time due to the on-going social distancing guidance, it is thought that over time these additional processes / procedures will delay the construction of affordable housing throughout the UK. Many construction workers are from European countries or work away from home for significant periods of time, and this also may be less desirable in the coming months with restrictions on travel and quarantine requirements.

2.42 There is concern that some construction companies will not survive in this challenging economic environment and there will be questions around the competitiveness of the market. Supply of the appropriate materials and products and the necessary amounts required may be a challenge going forward bringing into question the affordability of some sites. Maintaining on site social distancing in accordance within guidelines and sourcing accommodation for construction workers that may be working away from home could cause issues.

Financial and business support administered by East Suffolk Council

2.43 The East Suffolk Economic Development Team has regular discussions with local builders around skills and apprenticeship but there has been no direct discussion with builders regarding the impact of Covid-19. The Economic Development Team have reported discussions with developers who believe the planning process is drawn out, that developers have to allow at least a year from planning submission to being on site, and that the various consultation responses received during the planning process result in conflicting priorities and makes a decision challenging. Economic Development advised that the challenges currently facing developers due to the pandemic are;

- Supplies for sites are still a big challenge.
- Market uncertainty a huge challenge.
- Many staff furloughed are now returning to work (in early July 2020) but many are on reduced hours.

2.44 Throughout the pandemic the Economic Development Team have been providing the business community with up to date advice and guidance through their dedicated website <https://eastsuffolkmeansbusiness.co.uk/business-support/resources/covid-19/> and this has been supported by a social media campaign. The team have also been working closely with finance to administer the various government business grants. A member of the Economic Development Team sits on the New Anglia Building Growth Sector Skills Group which covers construction.

2.45 The Economic Development Team administered government grants to businesses affected by the pandemic, including a number that are in the construction sector as set out in the table below.

Type	Count of Type
Brick layer	1
Builder	48
Carpenter/Joiner	8
Construction	25
Construction Consultant	2
Plasterer	3
Roofing	7

Scaffolding	5
Grand Total	99

Fig. 05 Construction related business that successfully applied for government grants as of 6th July 2020.

- 2.46 The Economic Development Team have delivered Opening Town Centres Safely government grants to 12 towns together with other projects and interventions that are linked to the East Suffolk Growth Plan and are delivering sector specific or themed activities. The expectation is that an increasing return to normality in towns and businesses will improve consumer confidence and support the wider economy.

Impact of Covid-19 nationally on Local Planning Authorities

- 2.47 Research by Lichfields in April 2020 found that;

- 56% of Local Planning authorities were validating planning application as usual and 41% were operating with limitations and/or delays.
- 45% of Local Planning Authorities were publicising and consulting on application as usual and 25% has some limitations and delays.
- By April Councils were already using online platforms to stream committee meetings and delegating decisions to officers.
- In 45% of Councils all or the vast majority of planning staff remained in their roles while 34% experienced up to a quarter of staff being redeployed.³³

- 2.48 At East Suffolk Council, Planning Officers were not redeployed to work for other Council departments during the Covid-19 lockdown. Staff adapted to home working, and emergency measures were introduced to enable the Development Management Team to provide a continued service throughout the lockdown and Covid-19 related restrictions. Details of the measures implemented are provide below.

Support provided by the East Suffolk Planning and Building Control Service

- 2.49 Several Planning and Building Control Newsletters have been published since the beginning of April 2020. The newsletters are available on the Council's website and provide updates on planning policy including consultations, information regarding planning applications and support, updates on coastal management, details of government Covid-19 and planning related legislation, and local energy and infrastructure projects.

³³ <https://lichfields.uk/blog/2020/april/27/business-as-un-usual-how-is-the-planning-system-holding-up/>

The Planning and Building Control monthly newsletters are available to view at:

<https://www.eastsuffolk.gov.uk/planning/covid-19-updates/planning-newsletter/>

- 2.50 Early Covid-19 restrictions prevented on site visits and inspections by Building Control Officers, with the exception of emergency site inspections or dangerous structures. When site inspections resumed at the beginning of June 2020 each site inspection was individually risk assessed by the Building Control surveyor to ensure safety. Building Control remained fully operational with officers contactable for advice under a 'business as usual approach'. Support was offered on a case-by-case basis with the possibility of photographic evidence used as alternative to a physical inspection.
- 2.51 Very early attention was given to CIL and the impact of the pause in house sales on developer cashflow and CIL instalments through lock down. East Suffolk was one of the first authorities to implement measures to change instalments and pause any late payment interest, along with a pause on CIL enforcement. This caught the attention of MHCLG who discussed steps they wished to take with East Suffolk and reviewed East Suffolk's approach before the introduction of national measures. This was specifically described in the RTPi Paper - Pragmatic and prepared for the recovery.
<https://www.rtpi.org.uk/media/5318/pragmatic-and-prepared-for-the-recovery.pdf>
- 2.52 The Development Management and Planning Policy and Delivery Teams have operated throughout the Covid-19 lockdown with limited disruption to service. Officers have worked from home with some changes to work patterns and availability during standard office hours. Officers may have worked slightly different hours but remained available through the usual telephone and email contacts. Support and advice is provided in the newsletters published regularly on the East Suffolk website and a Duty Officer remains accessible. Extra attention has been given to agents and developers through virtual meetings which enabled officers to support submissions and queries, particularly on strategic sites.
- 2.53 Since the start of lockdown neither Planning or Enforcement Officers have undertaken site visits unless there were exceptional circumstances. Tree Officer have been conducting site visits where it is possible to view sites from public vantage points. All site visits are risk assessed and consideration given to whether evidence can be sources in other ways. Applicants are requested to submit suitable visual material to aid the consideration of applications by officers and interested parties.³⁴
- 2.54 The Council's Statement of Community Involvement (SCI) was temporarily suspended on 21st April 2020 in relation to the posting of site notices. The Government then published

³⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-and-Building-Control-Newsletter/19-Covid-Planning-Newsletter-May20.pdf>

guidelines on 13th May 2020 regarding temporary changes to the publicity requirements for certain planning applications during the pandemic. The temporary changes give local planning authorities greater flexibility when publicising planning applications. The Council is sending out letters to inform people of the submission of planning applications and ensuring they capture a wide audience.

- 2.55 Officers continued to communicate about planning applications with relevant Ward Members, Town or Parish Councils, applicants and agents. From 1st April 2020 Parish Councils were encouraged to register for E-consultations so they could view and comment on electronic documents.
- 2.56 The Planning and Building Control newsletter published on the East Suffolk website on 9th April provided details of how the Development Management Team were operating during the lockdown. Emergency measures were put in place temporarily delegating all decision making to the Head of Planning and Coastal Management until procedures for remote working and meetings could be implemented. A Virtual Advisory Panels considered the process of determination for all applications whether it was one of delegation or referral to the Planning Committee.
- 2.57 Virtual Planning Committees meetings are made possible through emergency legislation brought in under the Coronavirus Act 2020³⁵. Local authority meetings can be held remotely including allowing remote access by members of the public, to enable decision making to take place while complying with public health guidance on social distancing.³⁶ The North and South Planning Committee Meetings are now being held virtually via zoom and broadcast on YouTube with agendas, reports, and minutes available on the Council’s website. Remote planning committee meetings are working well and enabling interested parties to attend without having to give up so much of their time.³⁷
- 2.58 East Suffolk has also taken part in one of the pilot virtual planning inquiry appeals. Whilst not directly aiding local delivery it has supported the wider national measures to keep the planning and appeal process moving through the period of the pandemic. Very positive feedback on the process has been fed back to the Planning Inspectorate and East Suffolk is ready to embrace the virtual appeal process further into the future and supports this as an

35

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878332/Coronavirus_COVID-19_-_letter_to_councils_about_local_authority_meetings_and_postponement_of_elections.pdf

³⁶ <https://www.legislation.gov.uk/uksi/2020/392/contents/made>

³⁷ file://es-

<data/data/East%20Suffolk%20Planning%20Policy/Topics/3%20Housing/Housing%20Action%20Plan%20and%20land%20supply/2020%20Housing%20Action%20Plan/COVID-19%20info/RTPI%20pragmatic-and-prepared-for-the-recovery.pdf>

aim to speed up the planning process. The Council's advocate, Zack Simons, has written a positive blog post on the experience. <https://www.planoraks.com/posts-1/virtual-planning-inquiries-5-things-i-really-like-amp-1-thing-i-love>

- 2.59 In preparation for a return to increased applications and delivery all planning officers have taken advantage of extensive CPD webinars available to improve knowledge and skills. This will further equip officers to deal with complex applications for housing swiftly and efficiently. The hours of CPD gained have far exceeded those in previous years.
- 2.60 The Planning Policy and Delivery Team have also made appropriate adjustments to ensure that the planning policy service can continue to operate and that progress with planning policy documents to support housing delivery can continue. Progress with the Suffolk Coastal Local Plan has been able to continue, with the Main Modifications consultation held between 1st May and 10th July 2020. In order for this to progress, the Council put measures in place to ensure that those who wished to participate were able to, including through posting copies of consultation documents free of charge on request and through extending the consultation period to ten weeks. Planning Policy and Delivery Officers also undertook sites visits by viewing sites from cars, to finalise the housing monitoring for the 2019/20 year.

3 Housing Delivery Analysis

Analysis of time spent determining applications

- 3.1 The planning process follows a similar pattern for all applications. Pre-application advice³⁸ is not compulsory but is highly recommended for all applications. It can reduce the number and complexity of issues that need resolving during the application process, enabling quicker and more proactive decision making.
- 3.2 Planning applications must be validated to ensure that all the necessary information has been submitted and there is public consultation with statutory consultees, non-statutory consultees and neighbours notified. Additional information or minor revisions that would improve and make an application acceptable may be submitted. Large developments require a S106 agreement and developers are supported by the Council to submit and negotiate legal under-takings as early on as possible.
- 3.3 The Government has set the statutory time limit of 13 weeks for determining major developments (see definition below) and eight weeks for all other applications. A 16 week limit applies to applications subject to an Environmental Impact Assessment.
- 3.4 For housing, any application of 10 or more units, or development on 1 hectare or more, is classed as a major development.³⁹ An extension of time can be agreed between the Council and an applicant to allow for additional information or revisions to be submitted, and for negotiating S106 agreements. The data in the graph below highlights the wide-ranging amount of time it takes to determine a planning application.

³⁸ <https://www.eastsuffolk.gov.uk/planning/planning-applications/pre-application-planning-advice/>

³⁹ The Town and Country Planning (Development Management Procedure) (England) Order 2010, Part 1 Preliminary, 2, <http://www.legislation.gov.uk/uksi/2010/2184/made>

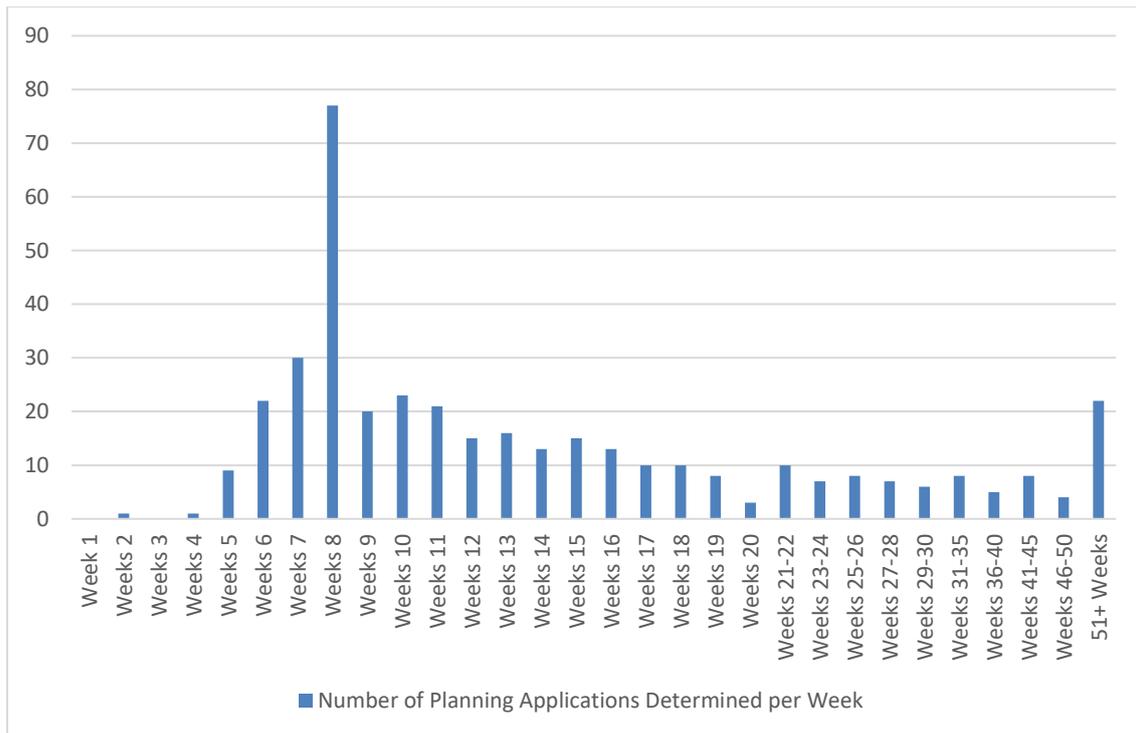


Fig. 07 Length of time in weeks to determine housing planning applications in former Suffolk Coastal and Waveney areas from 1st April 2016 – 31st March 2019

3.5 The result for the 2016-19 period covered by the Housing Delivery Test result is similar to the previous years’ results illustrated in Figure 25 in the 2019 Housing Action Plan. There is the expected spike in applications determined in advance of the eight week statutory limit, but none at thirteen weeks, 16 weeks or 26 weeks.

Despite a number of planning applications taking longer than 13 weeks to determine, East Suffolk were and still are, meeting the government’s targets for determining planning applications.

Analysis of length of time from consent to work starting on site

3.6 The following graph shows the number of housing developments completed in former Suffolk Coastal and Waveney District areas in the year 2018/19 relative to the length of time, in days, it took from planning consent being granted to the construction of dwellings starting on site.

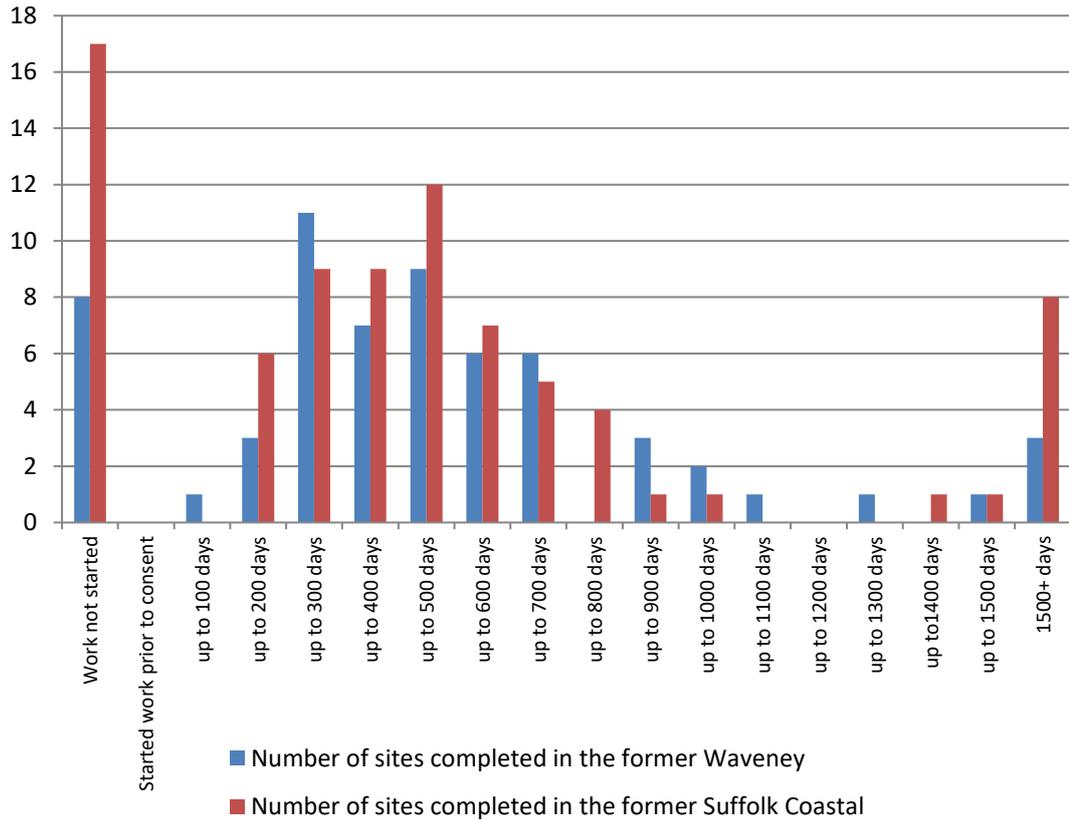


Fig.08 The length of time from consent to work starting on site for housing developments completed between 1st April 2018 – 31st March 2019

- 3.7 In the year 2018/19 50% of the former Suffolk Coastal area developments started within 400 days of consent being granted. Sites included one phased development of over 500 units, 2 large sites, 6 medium sites and 72 small sites. 45 of the sites are on ‘greenfield’ land and 36 are on previously developed land.
- 3.8 In the year 2018/19 50% of the former Waveney area developments started within 300 days of consent being granted. Sites included one phased development of over 500 units, 6 medium sites and 55 small sites. 26 of the sites are on ‘greenfield’ land and 36 are on previously developed land.
- 3.9 The following graph shows the number of housing developments completed in former Suffolk Coastal and Waveney District areas in the year 2019/20 relative to the length of time, in days, it took from planning consent being granted to the construction of dwellings starting on site.

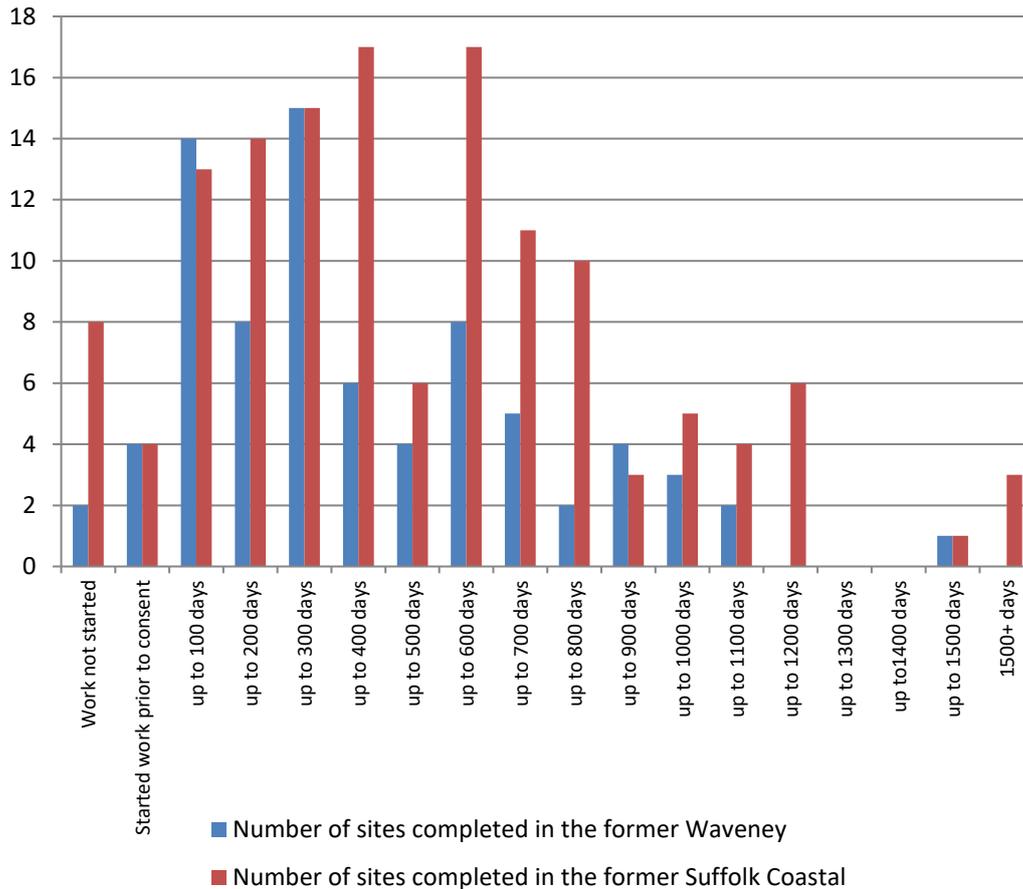


Fig. 09 The length of time from consent to work starting on site for housing developments completed between 1st April 2019 – 31st March 2020

- 3.10 In the year 2019/20 50% of the former Suffolk Coastal area developments started within 260 days of consent being granted. Site included one phased development of 2 large sites, 5 medium sites and 130 small sites. 75 of the sites are on ‘greenfield’ land and 62 are on previously developed land.
- 3.11 In the year 2019/20 50% of the former Waveney area developments started within 260 days of consent being granted. Sites included 3 medium sites and 75 small sites. 43 of the sites are on ‘greenfield’ land and 35 are on previously developed land.
- 3.12 The two graphs show largely positive results that do not cause serious concern or warrant detailed investigation. The graph’s distribution shows the time from full planning consent or approval of reserved matters being issued to work starting on site is broadly similar across the former Suffolk Coastal and Waveney areas. It is too early to detect trends and confirm whether the length of time from consent to work starting on site is reducing.

Analysis of sites that take a long time to start work on-site

- 3.13 Very long lengths of time from the grant of planning permission to work starting on-site could possibly indicate delays in the planning process (such as discharging planning conditions), delays in processing Building Regulation applications, issues securing financing, difficulty appointing builders or other issues.
- 3.14 A number of developments started work on site prior to planning consent being granted. This generally occurs where planning applications are retrospective, additional planning applications have been submitted to retrospectively secure changes to approved schemes, or schemes have phased developments.
- 3.15 After planning approval has been granted and prior to work starting on site a range of work takes place. The work necessary and the time it takes varies depending on the amount completed prior to planning approval, the size of site, site specific issues, and the in-house capabilities of the owner or developer of the site. The Council acknowledges that it is necessary to discharge planning conditions, commission an architect or technician to produce technical design drawings and specifications, appoint and coordinate the work of consultants (such as structural engineers, quantity surveyors, project managers, drainage experts, specialist subcontractor design information etc), prepare and submit a Building Regulation Application, produce a building tender package, go through a tender process, appoint a builder, and agree a building schedule.
- 3.16 It can be necessary to submit alternative planning applications for new or revised schemes following the sale of a site or the detailed costing of a scheme. Where consent is for outline planning, additional applications and approval is required for reserved matters.
- 3.17 All planning decision notices are issued with a standard condition requiring work to start on site within 3 years (approximately 1,095 days). It is acknowledged that not all owners / developers start work on site with the intention of completing the build in the near future. Planning consent can be kept active indefinitely by discharging pre-commencement conditions and carrying out work to satisfy the planning requirement for a technical 'start on site'. This limited 'start on site' does not necessarily require a significant investment of time or money but secures the planning consent and applicant's investment.
- 3.18 The vast majority of houses completed within the last two years were started well within the 3 year time frame from consent being issued. In the former Suffolk Coastal area 9-17% and in the former Waveney area 2-3% of housing completions were on sites that started three years or more from the issuing of planning consent. These sites are a mixture of brownfield and greenfield sites, and are mostly 'small' (10 or less units) in size.

2018/19 Former Suffolk Coastal sites 1,095+ days to start on site –

- 14 sites (out of a total of 81) = 17%
- Size = 1 500+, 2 medium and 11 small
- 10 greenfield, 4 brownfield

2019/20 Former Suffolk Coastal sites 1,095+ days to start on site –

- 12 sites (out of a total of 137) = 9%
- Size = 1 medium and 11 small
- 7 greenfield, 5 brownfield

2018/19 Former Waveney sites 1,095+days to start on site –

- 1 sites (out of a total of 62) = 2%
- Size = 1 small
- 1 brownfield

2019/20 Former Waveney sites 1,095+days to start on site –

- 2 sites (out of a total of 78) = 3%
- Size = 2 small
- 1 greenfield, 1 brownfield

2019/20 East Suffolk sites 1,095+day to start on site-

- 14 sites (out of a total of 215) = 7%
- Size = 1 medium and 13 small
- 8 greenfield, 6 brownfield

3.19 The developments include instances where houses are being replaced with a net gain of zero dwellings, and developments of 1 or 2 dwellings. These are likely to be self-build developments and the delay starting on site could reflect the challenges facing self-builders such as securing finance and appointing builders. It is understood that self-builders are less likely to commission work on building regulation applications until planning permission has been secured and planning conditions discharged, and they are more likely to use non standard construction methods. The relatively small numbers of historic planning consents being completed on site could simply reflect the personal circumstances and preference of the site owners.

3.20 Taking more than 3 years or 1,095 days to start seriously building on site is reasonably regarded as slow delivery. In the last year 2019/20 there were only 14 sites providing a total net gain of 25 dwellings that are classed as slow delivery. Across the whole of East Suffolk this represents approximately 7% of sites and less than 4% of the total net gain from developments.

3.21 The statistical information available regarding the time taken to start building dwellings with planning consent does not indicate any district wide issues. There is no evidence that the time between planning consent being issued and work starting is especially long and that action is necessary or possible to speed up this stage of housing development.

Impact of new legislation on applications

- 3.22 The Business and Planning Act 2020 temporarily modified the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990. The legislation provides opportunities for implementation of planning permissions and listed building consents that lapsed, or will lapse, between 23rd March 2020 and 31st December 2020. Unimplemented full planning permissions and listed building consents due to lapse between 19th August and 31st December 2020 are automatically extended to 1st May 2021. Full planning permission that lapsed between 23rd March and 18th August can be extended until 1st May 2021 however this is dependent on the granting of 'additional environmental approval'. For outline permissions that would have expired between 23rd March 2020 and 31st December 2020, the date by which a Reserved Matters application must be submitted is extended to 1st May 2021.
- 3.23 The number of applications that lapse without starting on site in East Suffolk are usually few in number. The majority of planning applications for housing that may benefit from the legislation extending the time limit for planning permission are small windfall sites providing 1 or 2 dwellings. The requirement for 'additional environmental approval', which in turn is dependent on the original permission having been subject to Habitats Regulations Assessment or a payment through the Recreation Avoidance and Mitigation Strategy means that it is unlikely that this will generate many additional completions and impact on housing delivery.

Analysis of size of sites

- 3.24 Over 50% of sites in the former Suffolk Coastal area delivered a single new dwelling in 2018/19. The top eight sites with the greatest number of units delivered 287 or 72% of the net gain in new dwellings.
- 3.25 The majority of sites in the former Waveney area provided a single dwelling in the year 2018/19. The majority of new dwellings are delivered on a small number of sites. The seven largest sites with the greatest number of units delivered 150 or 63% of the net gain in new dwellings.

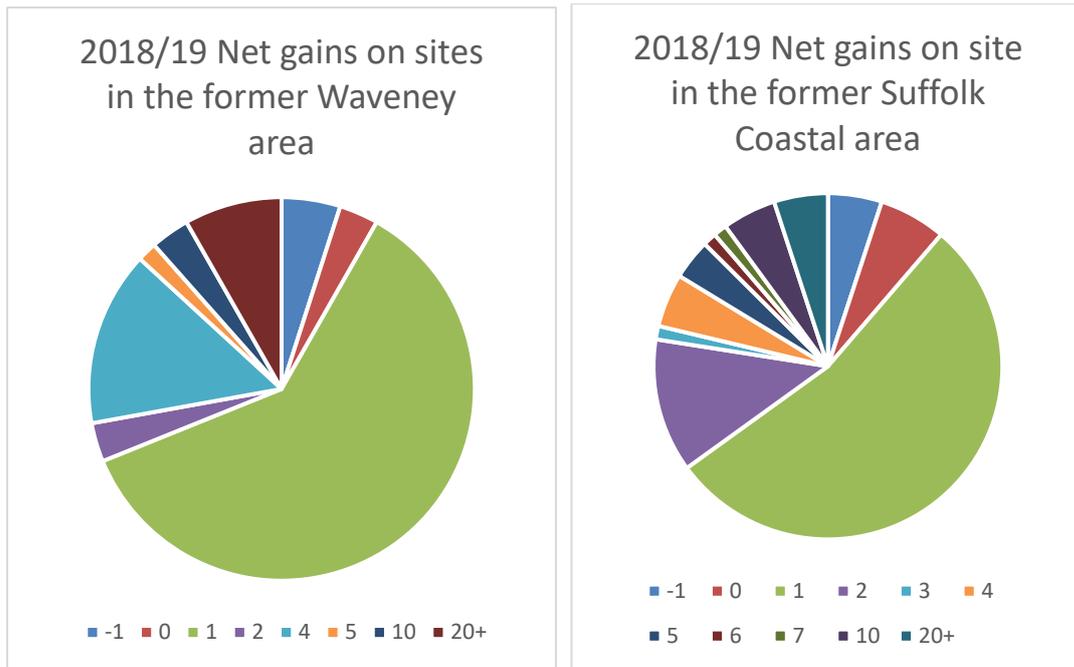


Fig. 10 & 11 Net housing gains on sites between 1st April 2018 – 31st March 2019

3.26 The following chart shows the net gain from sites that delivered housing in 2019/20 in East Suffolk.

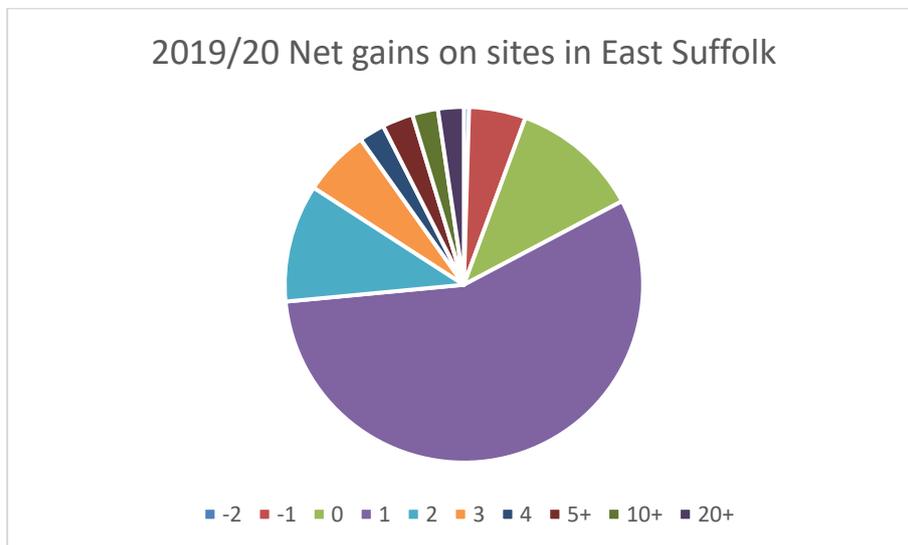


Fig. 12 Net housing gains on sites between 1st April 2019 – 31st March 2020

The pattern of site sizes and delivery is repeated across East Suffolk in 2019/20. Most of the new dwellings are delivered on a small number of sites with delivery rates of 10 plus units a year. The majority of sites across the district deliver a single new dwelling.

Impact of new Infrastructure on housing delivery

- 3.27 There are two specific infrastructure projects in East Suffolk that are likely to directly impact the delivery of housing in the short term.

New road bridge in Lowestoft

- 3.28 Lowestoft is the largest town in East Suffolk with a population of approximately 70,000. The town is located at the most easterly point in England with the North Sea to the east and Broads National Park to the west. The town is divided north and south by Lake Lothing with the Bascule Bridge to the east, near to the town centre and Mutford Lock Bridge to the west in Oulton Broad. Traffic congestion is considered to restrict the towns economic and housing growth.
- 3.29 The need for a new third road crossing over Lake Lothing has long been acknowledged locally. The new bridge will connect Waveney Drive and the Riverside Business Park, at the easterly end of the Kirkley Waterfront and Sustainable Urban Neighbourhood (allocated site WLP2.4) on the south side of Lake Lothing, with Denmark Road and North Quay Retail Park on the north side.



Fig. 13 Lake Lothing Third Crossing image. Suffolk County Council Website July 2020⁴⁰.

⁴⁰ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/lake-lothing-3rd-crossing/>

- 3.30 The completion of the new bridge will be a boost to the Lowestoft economy and support the delivery of significant housing growth in and around the town. The new bridge will particularly benefit the regeneration of Lowestoft's largest brownfield site, the Kirkley Waterfront and Sustainable Urban Neighbourhood (allocated site WLP2.4). The bridge requires a new road to be built through part of that allocation to service existing businesses and the Council Offices. The opening up of a brownfield site with a new access road is a considerable advantage in enabling mixed use development on that site to come forward.
- 3.31 The Secretary of State for the Department of Transport granted planning permission for the proposed Lake Lothing Crossing on 30th April 2020. Suffolk County Council intend to take the decision to Cabinet where details including construction tendering process, final project cost estimate, timetable and name for the bridge will be discussed and agreed. It is anticipated that construction will commence in early 2021.



Fig. 14 Lake Lothing Third Crossing timeline. Suffolk County Council Website July 2020⁴¹.

New flood Defences in Lowestoft

- 3.32 Lowestoft is considered to be at risk of tidal flooding between the Outer Harbour and the western end of Lake Lothing at Mutford Lock. In December 2013 a tidal surge flooded over 160 properties and caused significant disruption to road and rail networks. In July 2015 the Kirkley Stream flooded following extreme rainfall affecting 30 nearby homes.⁴²
- 3.33 The Lowestoft Flood Risk Management Project has developed a strategy to protect homes and business by reducing the risk of flooding from the sea, rivers and extreme rainfall. The project will support the economic growth and regeneration of the town by significantly reducing the risk of flood for 100 years.⁴³ Sites allocated in the Waveney Local Plan for housing and employment in central Lowestoft, will benefit from the town's reduced risk of flooding and the encouragement this will provide for investment.

⁴¹ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/lake-lothing-3rd-crossing/>

⁴² <http://www.lowestoftfrmp.org.uk/media/1197/2018-lfrmp-newsletter-i3.pdf>

⁴³ <https://www.eastsuffolk.gov.uk/news/once-in-a-century-opportunity-for-lowestoft-secured/>

- 3.34 The Department for Environment, Food and Rural Affairs (Defra) has awarded £43 million for the flood defences in Lowestoft. This is the largest single award from a £170 million national funding pot being divided between 22 flood defence projects across the UK.⁴⁴
- 3.35 The first flood defence works started on 27th July 2020 for approximately eight weeks. The works involve constructing a sheet piled flood defence wall approximately 300m long from the open space near Bloodmoor Road to behind the gardens of homes on Aspinal Close along the Kirkley Stream.⁴⁵ Works also include a pumping station that will be adopted by Anglia Water. The works will protect homes in Aldwyck Way and Velda Close.⁴⁶
- 3.36 The works to the inner harbour tidal defences will take place over three winters. The flood defences are planned for completion in 2025.⁴⁷

⁴⁴ <https://www.edp24.co.uk/news/43-million-funding-to-protect-lowestoft-1-6745318>

⁴⁵ http://lowestoftfrmp.org.uk/media/1370/2020-06-26-letter-to-residents-start-construction_.pdf

⁴⁶ <http://lowestoftfrmp.org.uk/media/1369/lowestoft-frmp-june-2020-fluvial-info-sheet.pdf>

⁴⁷ <http://lowestoftfrmp.org.uk/project-background/>

A Review of the East Suffolk Planning Service

- 3.37 In addition to two new Local Plans, East Suffolk Council has several initiatives, at various stages of development, to improve planning procedures and processes. The Local Plans are however the Council's primary tool for delivering new housing strategies and site allocations. The Local Plans, particularly the Waveney Local Plan, mark a significant change in spatial strategy and approach to site allocation. It is reasonable to expect the Local Plans to have a significant impact on housing delivery during the plan periods.
- 3.38 A detailed review of the East Suffolk Council Planning service is contained in the August 2019 Housing Action Plan available on the Council's website. The following section reviews the progress made on issues and actions identified in the 2019 Housing Action Plan and identified new actions that will support housing delivery.

Pre-application service

- 3.39 The Council operates a pre-application advice service for which a charge is made to cover officer time applied to this service, and encourages the take up of this service. The pre-application service enables the Council to provide an officer level response at an early stage, which for proposals which proceed to the planning application stage enables applicants to understand the information to submit alongside a planning application as well as any issues to be addressed. This potentially enables the validation and determination process to proceed more efficiently. The pre-application service is currently being reviewed.

Quality of planning applications

- 3.40 The Council has previously identified an issue in relation to the varied quality of applications submitted that can cause delays at the validation process when the Council needs to request alternative or additional material.
- 3.41 A consultation on a new Local Validation List was held between 6th May and 3rd June 2020 and responses are being considered.

Speed of determination

- 3.42 The Council is currently meeting Government targets in relation to the speed of determination of all planning application types.

Planning Conditions

- 3.43 The former Suffolk Coastal and Waveney planning departments previously operated with separate sets of model planning conditions. It was recognised that that this could create uncertainty for regular developers and agents who submit applications across the East

Suffolk area. The Council also recognised that planning conditions are particularly important given the need to agree pre-commencement conditions with applicants. Work on model planning conditions is complete and the Council now uses a single set of model conditions across East Suffolk.

Section 106 agreements

- 3.44 The time taken from starting to negotiate and draft a S106 agreement until completion and signature varies significantly with no standard time frames and it is regularly cited as causing significant delay in issuing planning permissions. The speed is dependant on when the process starts in relation to other planning matters, the issues raised by consultees during planning applications, the complexity of the issues involved, and the individuals involved in the negotiations.
- 3.45 The Major Sites and Infrastructure team was created last year, in part to better manage the S106 process. The Infrastructure part of the team has three S106 and CIL Officers, one Support Officer and an Infrastructure Delivery Manager. The team is now fully staffed, and shortly expanding with two further posts and this should increase the speed and efficiency of responses. The Council has introduced the Exacom system in the last 6 months to support the S106 and CIL process enabling clearer and transparent monitoring and management of developer contributions. The Council also has a specific Planning Solicitor focussing on S106 work and a close relationship with its housing enabling team to provide support on affordable housing requirements with S106 agreements.

Recruitment and resources

- 3.46 In 2019 it was recognised that to provide a high-quality service, there is a need for posts to be filled and for employees to have the ability to progress. Issues of recruitment and retention are common across many Councils nationwide.
- 3.47 A Major Sites and Infrastructure Team was established with five new positions that have been filled. The new team works proactively to deliver housing growth and investment in infrastructure. The creation of this team allows specific officer time to be applied to the challenging needs of the largest housing and employment sites across the District, including a number of Garden Communities and Neighbourhoods which are key to the delivery of the new Local Plans.
- 3.48 The Council has secured a Planning Performance Agreement (PPA) with funding from the Sizewell C Development Consent Order (DCO) to cover the temporary backfilling of staff during the DCO process. This will help ensure that work on the major Nationally Significant Infrastructure Project (NSIP) application will not impact the East Suffolk Planning Service's ability to support housing applications.

Affordable Housing Supplementary Planning Document

- 3.49 An Affordable Housing Supplementary Planning Document (SPD) is under development with the first consultation expected in late 2020 with adoption planned for 2021.
- 3.50 The Affordable Housing SPD will replace the following adopted SPDs:
- Affordable Housing Supplementary Planning Document (May 2012) – this relates to the former Waveney local planning authority area;
 - Supplementary Planning Guidance 2 Affordable Housing (July 2004) – this relates to the former Suffolk Coastal area.
- 3.51 The new Waveney Local Plan and the emerging Suffolk Coastal Local Plan contain planning policies relating to securing affordable housing as part of new residential development and in relation to the development of ‘exception sites’ for affordable housing. The new Affordable Housing SPD will reflect that there are differences in the policy requirements in the Waveney Local Plan and the emerging Suffolk Coastal Local Plan, albeit that guidance provided in relation to many parts of the policies could apply equally across both Local Plan areas.

Rural Housing Delivery Group

- 3.52 A Rural Housing Delivery Group has recently been established to increase the supply of rural affordable housing. The new Group is a joint scheme with the East Suffolk Housing Team and Planning Department working in collaboration with Homes England.

Self-build and Custom-Build Housing

- 3.53 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) places a duty to maintain a register of interest and grant permissions to meet demand for self and custom build housing. The Council’s Housing Enabling Strategy includes actions to support delivery of self and custom build housing. Furthermore, planning policies in the new local plans both support and require delivery of self and custom build housing.
- 3.54 The Council is exploring ways of directly contributing to the delivery of self and custom build housing through the Asset Management, Housing, Planning, and Regeneration teams working together. Additionally, processes have been put in place to enable developers/landowners bringing forward self/custom build developments to reach those people on the register, and to support those people on the register to find a plot. The self and custom build pages on the Council’s website have been re-designed and interactive content added to help facilitate this.
- 3.55 Information on self-build and custom-build is available on the East Suffolk website here: www.eastsuffolk.gov.uk/planning/self-build-and-custom-build/

Review of the Brownfield Site Register

- 3.56 The Housing Enabling Strategy (2020-2025) aims to encourage and facilitate developers and Registered Providers in the delivery of new homes. The Council has published a Brownfield Register and the Housing Enabling Strategy confirms the Council's commitment to review the register each year (as required by national regulations) to provide up to date information on brownfield land that is available for development.
- 3.57 The annual review of the Brownfield Register will consider whether the housing sites listed in Part 1 of the Register can be progressed and granted Permission in Principle and included in Part 2 of the Register. The benefits of reviewing brownfield housing sites could include greater certainty for developers and a speeding up of the housing delivery on sites.
- 3.58 Information including an interactive map of brownfield sites is available on the East Suffolk website here: <https://www.eastsuffolk.gov.uk/planning/brownfield-land-register/>

Attracting housebuilders to East Suffolk

- 3.59 East Anglia, particularly Lowestoft, has long struggled with its easterly, peripheral location and poor transport connections to other areas of England and the UK. Suffolk has no motorways and no international airports.
- 3.60 Attempts to attract a greater number and variety of housebuilders to Lowestoft or the wider East Suffolk area through invites to developer forums have not previously been successful. The Council holds a bi-annual Developer Forum through which it provides information to, and seeks input from, the development sector on topical planning matters. A Developers Forum was held in January 2020 and consideration was given to holding further events in 2020 virtually but this is not considered feasible at this time. To provide the development sector with up-to-date information and advice in the short term newsletters are published on the East Suffolk website.
- 3.61 The Council will continue to invite a range of housebuilders to bi-annual Developer Forums, when such meetings can resume, in order to provide a forum to provide updates on the work of the Planning service and to discuss topical issues and importantly to also consider any issues that arise from the development sector.
- 3.62 The Council is producing development briefs for 'small sites' (i.e. other than the Garden Communities / Neighbourhoods) allocated for housing in the adopted and emerging Local Plans. The Council recently sought views on the scope, aims and design of the draft template that will be used to help bring residential sites forward. The consultation took place between 5th June and 24th July 2020 and the responses are being considered.
- 3.63 The Council aims to use the development briefs as a tool to support high quality, inclusive and sustainable development. Once drafted the development briefs will take the form of Supplementary Planning Documents (SPDs) and be a consideration when determining planning applications. The Development briefs are intended to provide developers and applicants with concise and easily accessible information to support the design and layout of developments, as well as supporting the planning application process.
- 3.64 The production of development briefs for allocated sites, not only offers the opportunity to provide landowners, designers and developers with practical advice and information regarding development considerations but it also offers the opportunity to sell the opportunities and benefits of developing housing in East Suffolk. The development briefs will provide housebuilders with greater certainty regarding what is expected and possible on the site and therefore assist in speeding up the decision making process for planning applications.

4 Key Actions & Responses

Delivering Planned Growth

- 4.1 In East Suffolk the analysis and creative thinking to improve housing delivery has taken place through the plan-making process. The Housing Delivery Test deals with historic data but the new plans, with new allocations and a focus on Development Management resourcing to deliver will lead to a step-change in housing completions over the coming years. The Housing Action Plan serves as a monitoring document to keep on top of any potential delivery challenges that may occur, and ensure the adopted housing trajectory is met.
- 4.2 East Suffolk Council has liaised with landowners, agents and developers through the production of the Local Plans to ensure that allocated sites are available for development within the plan period. There are however issues beyond the scope of planning policy that could have an impact on both the delivery of sites and the build-out rates on sites. Within this context, it should be noted that both Local Plans include a contingency above the housing requirement to provide confidence that the required number of homes can be delivered should any sites be delayed or not come forward.
- 4.3 Issues beyond the scope of the Housing Action Plan could include;
- Covid-19 national and local lockdowns/ restrictions.
 - The housing market during and after the pandemic including consumer confidence and buyers access to financing.
 - Ownership issues, particularly sites that are mortgaged and owned by more than one individual. Co-ordinating various individuals can cause delays at numerous stages in the lead up to work starting on site such as the signing of contracts for sale or S106 agreements.
 - Managing land price expectations and viability.
 - Possible land banking by owners or developers to increase land value or squeeze out competitors.
 - The ability of developers to raise finances.
 - On site delays caused by highway infrastructure, utility companies, skilled labour shortages, or the availability of materials.
 - The impact of land and housing development being controlled by a small number of land owners and housebuilders, which would affect the rate at which land is released.
 - The ability of the East Suffolk area to attract a diverse range of housebuilders.

- The rise in volume housebuilders and decline of small and medium housebuilders, and the impact on housing delivery and build-out rates.
- The impact of homogenous house types on the housing market's absorption rate.

4.4 An annual Housing Action Plan offers the opportunity to 'check' the direction and success of each of the Local Plans and other initiatives.

Actions

- 4.5 The Council maintains a proactive approach to improving internal processes and procedures in the Planning service and is committed to improving housing delivery in East Suffolk. Several initiatives were conceived and started prior to drafting the first Housing Action Plan in 2019. There are therefore actions taking place or due to take place that do not relate directly to issues that have been identified in this plan but will assist in future housing delivery.
- 4.6 The current uncertainties show that it is important to have up-to-date information on the housing delivery numbers and the issues affecting development in the local plan areas. The Planning Policy and Delivery Team collate data on housing completions quarterly which provide an indication of delivery issues. Regular engagement will take place with developers that are intending to start work on site in the next five years or have already started work on site to monitor the impact of the Covid-19 pandemic on housing delivery in the short to medium term. This may include further surveys to assess developer confidence in the market and identify any issues with delivery that may benefit from action from the Council.
- 4.7 The actions detailed below focus on procedural improvements, policy implementation, monitoring and delivery, and the Planning service's resources. As stated earlier, the Council's Housing Enabling Strategy sets targets that are relevant to actions beyond the Planning service.
- 4.8 The table below includes a review of the progress made and status of previously identified issues in the 2019 Housing Action Plan and new actions identified in this plan.

Action (outcome to be achieved)	Success	Revised Timescale	Priority	August 2019 Status	August 2020 Status	Service/ owner	Notes
Procedural							
Review and consult on a new pre-application advice service.	Increased up take up of pre-application advice service	2021	Low	Underway	Underway	Development Management	Work has commenced.
Publish template Planning Performance Agreements for major sites	Swifter negotiation of PPAs and increased sign up leading to swifter decision making	2020	Low	Not started	Not started	Major Sites and Infrastructure Team	
Introduce an Accredited Agents Scheme	Faster validation service	NA	NA	Underway	Work ceased	Development Management	The introduction of the scheme has been put on hold.
Publish an updated Local Validation List	Increase in the quality of planning applications preventing the need for requesting further information from applicants and enabling swifter validation of applications.	2020	High	Underway	Underway	Development Management	Consultation on local validation list held 06/05/20 – 03/06/20. Responses being considered.
Introduce one set of model conditions	Consistent quality of service across the former Waveney and Suffolk Coastal areas	NA	NA	Underway	Complete	Development Management	One set of planning conditions in use across East Suffolk.
Develop S106 templates with standard wording for different standard scenarios that would be published on the website	Reduction in the length of delays	2021	Medium	Underway	Underway	Major Sites and Infrastructure Team	
Policy Implementation							
Affordable Housing Supplementary Planning Document	Adoption of new Supplementary Planning Document	2021	Medium	NA	Underway	Planning Policy and Delivery	
A new Rural Housing Delivery Group including the Housing Team, Planning Department and Homes England	Facilitate an increase in the supply of rural affordable housing.	2021	Medium	NA	Underway	Planning Policy and Delivery, Housing, & Asset Management	
Annual review of the Brownfield register	Review of housing sites to create greater certainty for developers and speed up delivery.	2021	Medium	NA	Not started	Planning Policy and Delivery	

The Council will embed processes to facilitate delivery of self/custom build plots across the Asset Management, Housing, Planning, and Regeneration teams.	The Council will make land with planning permission for self/custom build development available for purchase.	2021	Medium	NA	Underway	Asset Management; Development Management; Housing; Planning Policy and Delivery; Regeneration.	
Ongoing monitoring of the impact of Covid-19 on the construction and future housing delivery.	Analysis of results and update actions	2020/21	High	NA	On-going	Planning Policy and Delivery	Ongoing target liaison with developers where appropriate
Adoption of up to date Suffolk Coastal Local Plan	Planned approach to growth, which can be supported by the other actions identified above	Late summer 2020	High	Underway	Underway	Planning Policy and Delivery	Public hearings and main modifications complete. Anticipated adoption in late summer 2020.
Establishment of Major Sites and Infrastructure Team	Planning Service able to bring together factors involved in delivery of sites	2019/20	High	Underway	Completed	Planning Policy and Delivery	The Major Sites and Infrastructure Team has been established and fully staffed. The team is dedicated to assisting the development of high quality large scale schemes.
Production of design / development briefs and project plans for larger sites	Clear guidance to support submission of planning applications, improved design and less homogenous housing	2019/20	Low	Not started	Underway	Planning Policy and Delivery (Major Sites and Infrastructure)	The design template/ briefs for small sites will form the starting point for developing briefs for larger sites but already commenced joint working with Suffolk County Council (as landowner) to produce a development brief/masterplan for the North of Lowestoft Garden village.
Develop design briefs for small sites	Clear guidance to support submission of planning applications and support for small and medium housebuilders to East Suffolk	2019/20	Low	Underway	Underway	Planning Policy and Delivery	Early consultation on the scope, aims and design of the draft template for

							residential development briefs ended 24/07/2020.
Monitoring and Delivery							
Develop and maintain a list of development sites (and use a 'RAG' system to prioritise resources to assist development)	More engagement with land owners and developers and the ability to act quickly to resolve issues	2019/20	Medium	Underway	Underway	Planning Policy and Delivery	The Major Sites and Infrastructure Team and Policy and Delivery Team are carrying out discussion regarding the type of information available in the Council the best methods of recording and monitor on going progress on sites.
Resources							
Re-advertise posts	Fill vacant posts in Major Sites and Infrastructure Team	2019	High	Underway	Complete	Planning Policy and Delivery (Major Sites and Infrastructure)	The Major Sites and Infrastructure Team, and the Planning Policy and Delivery Team are now fully staffed.

5 Delivery and monitoring of the Housing Action Plan

- 5.1 Actions will be carried out and details published in accordance with the requirements detailed in the Actions table above. East Suffolk intends to produce a Housing Action Plan each year within six months of the annual publication of the Housing Delivery Test results. Each Housing Action Plan will include a review of the progress made and status of previously identified issues in the Table above.

Future Housing Actions Plans and Housing Delivery Tests

- 5.2 The construction of new dwellings includes negotiating the sale of land, the development of a design, securing planning consent, technical design and specification, securing Building Regulations consents, and construction which altogether is a time consuming process, and is also dependent on the market. It is therefore acknowledged that delivery of the Local Plans is an ongoing action, and whilst some sites will deliver housing in the short-term others will deliver in the latter parts of the plan period.
- 5.3 The two Local Plans contain realistic housing trajectories which reflect the time necessary for the new housing strategies to impact building completions. The Government has supported the construction industry throughout the pandemic permitting construction sites to remain operational. The Government considers the construction sector to be vital to the Country's economic recovery from the pandemic with plans to "build back better" following the coronavirus and invest £5 billion to accelerate infrastructure projects and fuel jobs.⁴⁸ However, it is acknowledged that impact of the Covid-19 pandemic is unknown at this time and will need to be monitored with forecasts and trajectories revised as necessary.
- 5.4 Each Local Plan also specifically contains policies that support small windfall developments. These include permitting residential development within designated settlement boundaries, having exceptions for affordable housing in the Countryside, permitting up to 5 dwellings in the Countryside subject to conditions, supporting self-build and custom build and supporting the use of gardens and urban infill sites. Small windfall developments have historically provided a significant source of housing in East Suffolk. Small sites also usually have a quicker development that will assist short-term housing delivery.

⁴⁸ <https://www.gov.uk/government/news/build-build-build-prime-minister-announces-new-deal-for-britain>

- 5.5 The publication of a Housing Action Plan will not impact the number of completions in East Suffolk before the publication of the next Housing Delivery Test results. The Housing Delivery Test is based on the previous three years of completed house builds. It is acknowledged that there will inevitably be a delay in any change to annual house completions affecting the overall Housing Delivery Test result. It is therefore necessary to have realistic expectations of incremental change.

Email us 

Planning Policy and Delivery Team (Local Plans)

Planningpolicy@eastsoffolk.gov.uk

Development Management (Planning Applications)

planning@eastsoffolk.gov.uk

Call us 

Planning Policy and Delivery Team (Local Plans)

01394 444557 / 01502 523029

Development Management (Planning Applications)

01502 523100

Write to us 

East Suffolk Council
Planning Policy and Delivery Team
Riverside, 4 Canning Road, Lowestoft
Suffolk NR33 0EQ

This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

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