

# Housing Action Plan

Identifying actions to support the delivery of new housing

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# Summary

- i. 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 purpose of a Housing Action Plan is to identify the reasons for under delivery and to set out measures to reduce future risk.
- ii. 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 Local Plans: the result for the former Suffolk Coastal area is 128% and the result for the former Waveney area is 72%.
- iii. Whilst further action is not required for the former Suffolk Coastal area, a Housing Action Plan and the application of a 20% buffer in the 5-year housing land supply calculation is 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.
- iv. 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 and the Local Plan for the former Waveney area having been recently adopted. 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%.
- v. The Council maintains a proactive approach to housing delivery with several initiatives conceived and started prior to the drafting of the Housing Action Plan. The actions are focused on improvements to processes and procedures in the Planning Service, Policy initiatives, including working towards the adoption of the Suffolk Coastal Local Plan, the creation of a Major Sites and Infrastructure Team, and most importantly, the implementation and monitoring of the new and emerging Local Plans and the site allocations within them.

- vi. Under the Planning Practice Guidance the former Suffolk Coastal and Waveney areas will be assessed separately for the Housing Delivery Test for one more year in 2019 and will then be assessed as a single planning authority from 2020 onwards.
  
- vii. 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 2019 Housing Delivery Test will result in over 100% for the former Suffolk Coastal area and approximately 85% for the former Waveney area. It is possible is that the 2020 Housing Delivery Test will be close to 100% for East Suffolk and therefore no action will be required. However, regardless of future results, it is intended 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 East Suffolk Council is committed to delivering new housing to meet identified needs and to increase the mix of housing available, including affordable housing. The East Suffolk Business Plan<sup>1</sup> sets a vision to ‘Maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk.’ One of the critical success factors identified in the Business Plan is ensuring improved access to appropriate housing to meet existing and future needs, including more affordable homes for local people. The East Suffolk Housing Strategy (2017 – 2023)<sup>2</sup> identifies ‘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’.
- 1.2 East Suffolk Council was created on 1<sup>st</sup> April 2019 comprising the areas formerly covered by Suffolk Coastal and Waveney districts. The Council has recently adopted a new Local Plan for the area formerly covered by Waveney district<sup>3</sup> (excluding the area covered by the Broads Authority) and is well advanced in the production of a new Local Plan for the area formerly covered by Suffolk Coastal district<sup>4</sup>. The new local plans contain site allocations and policies to deliver the new housing needed.
- 1.3 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 Book<sup>5</sup>. 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

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<sup>1</sup> <https://www.eastsuffolk.gov.uk/assets/Your-Council/Business-Plan/East-Suffolk-Business-Plan.PDF>

<sup>2</sup> <https://www.eastsuffolk.gov.uk/assets/Housing/East-Suffolk-Housing-Strategy-2017-2023/East-Suffolk-Housing-Strategy-2017-23.pdf>

<sup>3</sup> <https://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/>

<sup>4</sup> <https://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/>

<sup>5</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728523/HDT\\_Measurement\\_Rule\\_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)

- the presumption in favour of sustainable development if housing delivery falls below 75%, once transitional arrangements have ended<sup>6</sup>.

1.4 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 does provide a list of the aspects that a local authority could review and the actions that a local planning authority could consider.<sup>7</sup>

1.5 The first set of Housing Delivery Test results were published in February 2019<sup>8</sup>. 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 <sup>9</sup>				Number of homes delivered <sup>10</sup>				HDT result
	2015-16	2016-17	2017-18	Total	2015-16	2016-17	2017-18	Total	
Suffolk Coastal	465	465	392	1,322	564	550	582	1,696	128%
Waveney	312	313	299	925	133	243	293	669	72%

*Fig. 01 2018 Housing Delivery Test results*

1.6 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.’<sup>11</sup> As the two areas are now 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 area currently covered by the former Suffolk Coastal area, this housing action plan covers the full East Suffolk local planning authority area (note this is excluding the Broads Authority area).

<sup>6</sup> 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%.

<sup>7</sup> 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>.

<sup>8</sup> <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

<sup>9</sup> Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

<sup>10</sup> Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test 2018 Measurement Technical Note published alongside the results

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779782/HDT\\_technical\\_note.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779782/HDT_technical_note.pdf).

<sup>11</sup> Planning Practice Guidance Paragraph: 048 Reference ID: 68-048-20190722 Revision date: 22July 20109

## Purpose and scope of this action plan

- 1.7 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 identifying the causes of under delivery of housing in previous years, how this relates to planned growth and identifying actions to address these issues. The current housing requirements for East Suffolk are set out below:
- Former Suffolk Coastal area: 542 dwellings per year as established through the standard methodology. A new Local Plan was submitted for Examination in March 2019.
  - Former Waveney area: 374 dwellings per year, as set out in the Waveney Local Plan (2019)
- 1.8 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 and the provision of affordable housing and it is essential that these objectives are also delivered.
- 1.9 The East Suffolk Housing Strategy 2017-23 sets out a strategy to address housing needs, particularly the need for affordable housing. The top priorities include:
- *Increase the amount of Council owned affordable housing from 4,479 homes to more than 5,100 homes including developing on Council owned and exception site land in Suffolk Coastal.*
  - *Utilise the strength of the Waveney housing assets to assertively intervene to deliver the Lowestoft and Outer Harbour Area Action Plan (details now available in the Waveney Local Plan 2019).*
  - *Increase the overall number of affordable homes in the former Waveney area by 150 units per annum and in the former Suffolk Coastal area by 100 units per annum.*
  - *Actively support the broader supply of housing to ensure East Suffolk is the preferred location for private developers and housing associations.<sup>12</sup>*
- 1.10 The Housing Action Plan will also sit alongside the Council's Housing Enabling Strategy. The Housing Enabling Strategy is being produced jointly by the Housing and Planning services, with input from other areas of the Council, and will set out the corporate approach to increasing housing delivery, covering such aspects as the use of the Council's assets and the role of the Council in the delivery of rural exception sites. The Council is now playing an active role in acquiring and developing sites for

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<sup>12</sup> <http://www.eastsuffolk.gov.uk/assets/Housing/East-Suffolk-Housing-Strategy-2017-2023/East-Suffolk-Housing-Strategy-2017-23.pdf>

housing. This Housing Action Plan therefore focuses on actions that are specific to planning, however identifies linkages with wider corporate objectives and actions where relevant.

- 1.11 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 latest Statement of Housing Land Supply was published in August 2019 and this demonstrates that there is a 7.03 years supply in the former Suffolk Coastal area and a 6.58 years supply in the former Waveney local planning authority area.
- 1.12 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 consider recent actions that the Council has taken which won't yet be reflected in the delivery figures. This is particularly relevant to East Suffolk, as the Waveney Local Plan has been recently adopted and its implementation has only recently commenced whilst in the Suffolk Coastal area the Housing Delivery Test has been met.



## The East Suffolk Area Profile

- 1.13 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.
- 1.14 The 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

- 1.15 East Suffolk Council is the most easterly Council in England and the ninth largest district in the country geographically. The majority of the area is rural in character covering approximately 487 square miles with a coastline of 78.9km. East Suffolk adjoins Norfolk County Council, Great Yarmouth Borough Council and South Norfolk District Council to the north, Mid Suffolk District Council to the west and Ipswich Borough Council to the south. The northern edges of East Suffolk along the River Waveney fall within the Broads Authority administrative area.
- 1.16 East Suffolk has a total of 423 designated nature conservation sites which cover 47,224ha, 52 Conservation Areas, and approximately 3,900 listed buildings. With exceptional natural, historic and built environments the district is therefore a popular destination for visitors from the UK and abroad.

### Population

- 1.17 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. The most densely populated wards are Harbour and Normanston in Lowestoft with 39.35 persons per hectare and the least densely population wards are Wrentham and Westleton with 0.31 persons per hectare. The population is split 51.3% female and 48.7% male.
- 1.18 The demographic for East Suffolk is different to the demographic for England. 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.

Age group	East Suffolk	England
0-19	21.1%	23.7%
20-39	18.8%	26.6%
40-64	33.3%	31.8%
65+	26.8%	18.1%

Fig. 02 Population age<sup>13</sup>

## Housing

- 1.19 The housing mix for East Suffolk highlights the rural character of the district when compared to the housing mix for England. East Suffolk has a considerably larger proportion of bungalows and detached properties whilst the percentage of flats/maisonettes, terraced and semi-detached properties is smaller than the figure for England.

	East Suffolk	England
Bungalows	21.8%	9.5%
Flats/maisonettes	10.3%	22.8%
Terraced	23.2%	26.5%
Semi-detached	18.8%	23.9%
Detached	23.9%	15.5%

Fig. 03 Housing mix<sup>14</sup>

- 1.20 866 new properties were built in 2017-18 and result in a total of 117,030 properties in East Suffolk in 2018. Between June 2018 and June 2019 the average sold house price was £246,494 and the median sold house price was £209,475<sup>15</sup>:
- 1.21 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. In 2018 the average home in the former Suffolk Coastal area was over ten times the average salary and in the former Waveney area the average home was approximately seven-and-half times the average salary. East Suffolk is experiencing a similar housing crisis to the rest of the UK, but it is particularly acute in the former Suffolk Coastal area.

<sup>13</sup> ONS 2017

<sup>14</sup> Valuation Office Agency – Council Tax Statistics 2017

<sup>15</sup> [HM Land Registry 01/06/18 – 01/06/19](#)

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 ratios<sup>16</sup>

## Planning

- 1.22 The planning service falls within the Planning and Coastal Management Service Area. The planning service covering the former Waveney and Suffolk Coastal areas has operated as one for the past ten years at officer level, albeit that until recently there were two separate Councils. The service operates across two sites at Lowestoft and Melton. Despite their many similarities Waveney and Suffolk Coastal fall within two different housing market areas and have therefore developed two independent Local Plans. These Local Plans are currently at different stages of development. The Waveney Local Plan was adopted in March 2019. The Suffolk Coastal Local Plan is at an advanced stage and has recently been submitted to the Planning Inspector for examination. The development of Local Plans has been the primary focus of Planning Policy and Delivery Officers in recent years.

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<sup>16</sup> House price to workplace based earnings ratio, [ONS 2019](#)

## Methodology

- 1.23 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.
- 1.24 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 by the Planning Advisory Service to learn from others and ensure that it is producing an effective action plan.
- 1.25 The methodology that East Suffolk Council has followed is summarised below. The Council has taken a proportionate approach, focused on developing its existing understanding of the nature of issues affecting delivery.
- 1.26 The starting point for the Council has been that within the former Suffolk Coastal area, the Housing Delivery Test has been passed. Nevertheless, the Council has sought to identify whether there are likely to be any future issues arising through the supply of sites which could be addressed or whether there are any areas in which the Council can improve. In relation to the former Waveney area, the starting point has been that through the recent review of the Local Plan the deliverability of the strategy has been a key consideration in selecting a preferred strategy and site allocations, and therefore 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.
- 1.27 The Council annually publishes a Housing Land Supply Statement, setting out the number of years supply of land for housing that is available. Reflecting the change in definition of 'deliverable' in the 2019 NPPF, the Council has this year sought more detailed information from developers and landowners. The responses have fed into the analysis contained in this action plan where relevant.
- 1.28 The methodology and approach is described below.
- 1.29 To explain that the Council is not starting with a 'blank piece of paper,' in terms of understanding housing delivery, initially the Housing Action Plan has sought to set out the aims behind the new Local Plans in terms of housing delivery:
- The Housing Action Plan explains the approach in the newly 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.

1.30 To supplement 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 published material to determine factors identified as issues at the national level, and to consider their applicability to East Suffolk;
- Analysis of trends associated with past delivery in East Suffolk, based upon appropriate 'typologies' of sites;
- Consideration of the characteristics of planned development, in relation to the above;
- Analysis of any matters affecting delivery arising from consultation with developers / landowners (through the Council's existing developer forum and data gathered through the production of the housing land supply statement);
- Based on the above, analysis of common issues has been undertaken in relation to specific sites / site typologies to help to focus the actions.

1.31 To identify whether there are any areas relating to the operation and performance of the Council that could better support housing delivery, the Housing Action Plan has considered the Development Management processes and the role of the Planning Service, as set out below:

- Analysis of Development Management processes, including the pre-application process, determination time, use of conditions, Section 106 agreements; and
- Consideration of the services that are provided and how these are resourced.

1.32 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.

1.33 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 Housing service.

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

## Suffolk Coastal Local Plan

- 1.35 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.
- 1.36 Policy SP20 of the Core Strategy and Development Management Policies DPD set out the approach to development in the Eastern Ipswich Plan Area which included the development of 2,000 dwellings (along with other uses) at land to the south and east of Adastral Park.
- 1.37 Whilst the Core Strategy was adopted in July 2013, it was subsequently subject to an unsuccessful legal challenge in relation to the proposals for Adastral Park (now known as Brightwell Lakes) which were concluded in May 2015, which delayed the granting of planning permission and the delivery of the site. However, development of the site has since progressed with outline planning permission granted in April 2018. The reserved matters for the first phase have a resolution to grant permission and applications to discharge conditions are currently being determined. The Council has been actively involved in enabling the site to come forward. A bid for funding from the Housing Infrastructure Fund has been submitted to Homes England to assist with infrastructure provision in the first five years of the development.
- 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 2014<sup>17</sup> to 9.3 years in 2018<sup>18</sup>. 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 The sites allocated in the DPDs included a range of sizes of site, and are mostly greenfield sites, however did include two housing allocations on previously developed land:
- SSP18 – Land at Old Station Works, Westerfield – outline planning permission granted in June 2019 for 75 dwellings (ref DC/18/3850/OUT)
  - FPP3 – Land at Sea Road, Felixstowe – full planning permission granted in July 2018 for 59 dwellings (ref DC/17/3967/FUL)

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<sup>17</sup> <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Housing-Land-Availability/Land-Supply-Assessment-2014.pdf>

<sup>18</sup> <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Housing-Land-Availability/Housing-Land-Supply-Statement-June-2018.pdf>

- 1.40 Three 'made' Neighbourhood Plans in the former Suffolk Coastal area also allocate sites for housing – Framlingham Neighbourhood Plan, Leiston Neighbourhood Plan and Melton Neighbourhood Plan.
- 1.41 A number of existing site allocations now have planning permission, and 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 currently going through Examination and is anticipated to be adopted in early 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 31<sup>st</sup> 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.
- 1.42 Housing delivery in the area has exceeded set annual targets since 2015/16, although it is acknowledged that there has been a lack of site allocations to guide development prior to the adoption of the two DPDs in 2017 referred to above.
- 1.43 The new emerging Local Plan identifies the housing requirement for the period 2018 – 2036. The Final Draft Local Plan (January 2019) includes a housing requirement of 582 dwellings per year (although under the current Planning Practice Guidance and affordability ratio data released since the production of Final Draft Local Plan the housing need figure is 542 dwellings). The Final Draft Local 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, to deliver a residual of 3,478 dwellings (plus an 8.5% contingency and an anticipated windfall delivery of 800 dwellings over the plan period). The approach is to provide a diversity of supply of sites.
- 1.44 As shown in Table below, which is taken from the Final Draft Local Plan, a large proportion of the housing which will meet the overall housing need over the plan period is already committed through existing allocations and permissions, however the Local Plan will guide and support the delivery of the residual need. Table 3.2 below shows the distribution of growth planned for in the emerging Local Plan (as set out in the Final Draft Local Plan). The information is relevant to the base date of the Plan which is 1<sup>st</sup> April 2018.

	Number of dwellings
Outstanding planning permissions (31.3.18)	3,609
Dwellings with resolution to grant planning permission, subject to S106 (31.3.18)	2,413 <sup>19</sup>
Allocations in current Local Plan or Neighbourhood Plans ( <i>without</i> permission or resolution to grant subject to S106) (31.3.18)	976
Total commitments (31.3.18)	6,998
Housing requirement (2018 – 2036): (582 x 18)	10,476 (582 dwellings per annum)
Residual need (requirement minus commitments)	10,476 – 6,998 = <b>3,478 residual need.</b> This is the minimum to be planned for in the Local Plan, however a contingency will also be incorporated.

Fig. 05 Table 3.2 of the Final Draft Local Plan sets out the residual housing need. Suffolk Coastal Final Draft Local Plan.

1.45 Table below, from the Final Draft Local Plan, sets out the spatial distribution:

Location	Percentage of new growth identified in this Local Plan <sup>20</sup>	Approximate Number of units (rounded) (minimum)
Communities related to the A12 Saxmundham area <sup>21</sup>	18%	800
Other A12 communities <sup>22</sup>	15%	667
Felixstowe (including the Trimleys) <sup>23</sup>	38%	1,670
Rural Settlements	12%	543
Communities surrounding Ipswich	11%	490
Framlingham	2%	100
Leiston	2%	100
Total		4,370

Fig. 06 Table 3.3. from the Suffolk Coastal Final Draft Local Plan.

1.46 Within the Suffolk Coastal area, delivery over the past three years has exceeded the housing requirement. For the years 2015/16 and 2016/17, the Housing Delivery Test has measured delivery against the housing requirement contained in the Core Strategy and Development Management Policies DPD (2013) and for the year 2017/18 has measured delivery against the 2014-based household projections, following the transitional measures set out in the Housing Delivery Test Measurement Rule Book.

<sup>19</sup> 2,000 dwellings relate to the Brightwell Lakes development, which was subject to a resolution to grant as at 31.3.18

<sup>20</sup> Note that figures may not sum 100% due to rounding

<sup>21</sup> Including the part of Benhall and Sternfield Parish within the proposed Saxmundham Garden Neighbourhood

<sup>22</sup> Woodbridge northwards

<sup>23</sup> Whilst Trimley St Martin and Trimley St Mary are identified as Large Villages in the settlement, in terms of District wide spatial distribution it is appropriate to identify these villages alongside Felixstowe owing to the strong functional relationship between them.



## Waveney Local Plan

1.47 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.

### Previous spatial strategy

1.48 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)<sup>24</sup>. 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.

1.49 The previous spatial strategy and Planning Policies were contained in;

- 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).

1.50 The Waveney Core Strategy (2009) identified 6,960 dwellings to be delivered in the period 2001 to 2025 at a rate of 290 a year.<sup>25</sup> The Site Specific Allocations (2011) was to deliver 530 dwellings up to 2025 and the Lowestoft Lake Lothing & Outer Harbour Area Action Plan (2012) was to deliver 1,500 dwellings up to 2025. A further 250 dwellings were expected through windfall.

1.51 Under the spatial distribution of the Waveney Core Strategy (2009), 70 to 80% of housing growth was identified for Lowestoft, 15 to 25% to market towns and 5% to larger villages.<sup>26</sup> The strategy did not include any site allocations in the villages. This strategy emphasised the districts dependence on the five towns for services and facilities and did not encourage development in more rural areas.

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<sup>24</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Core-Strategy.pdf> page17

<sup>25</sup> Waveney AMR 2011/12, page 7,

<sup>26</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Core-Strategy.pdf> page19&20

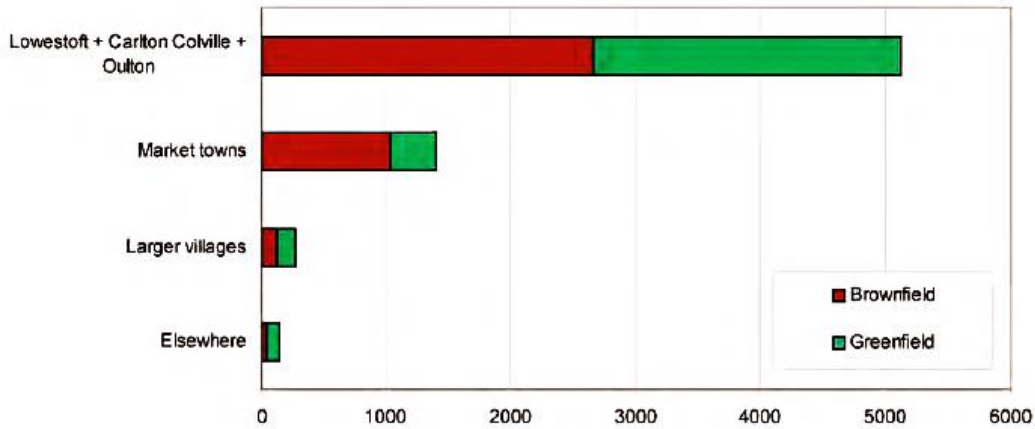


Fig. 07 Anticipated amount of housing on previously developed (or brownfield) and greenfield land in Waveney 2001-2025. Waveney Core Strategy.<sup>27</sup>

1.52 Over the period 2001 to 2010 the Waveney area delivered new homes at the average rate of 357 dwellings a year, exceeding the target of 290 dwellings a year, and over delivered against the housing target by 602 dwellings.<sup>28</sup>

1.53 The key plans in the Waveney Local Development Framework were finalised and adopted in early 2009 and early 2011 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.

<sup>27</sup> <http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Core-Strategy.pdf> page 54

<sup>28</sup> Waveney AMR 2009/2010, page 24, para.3.16

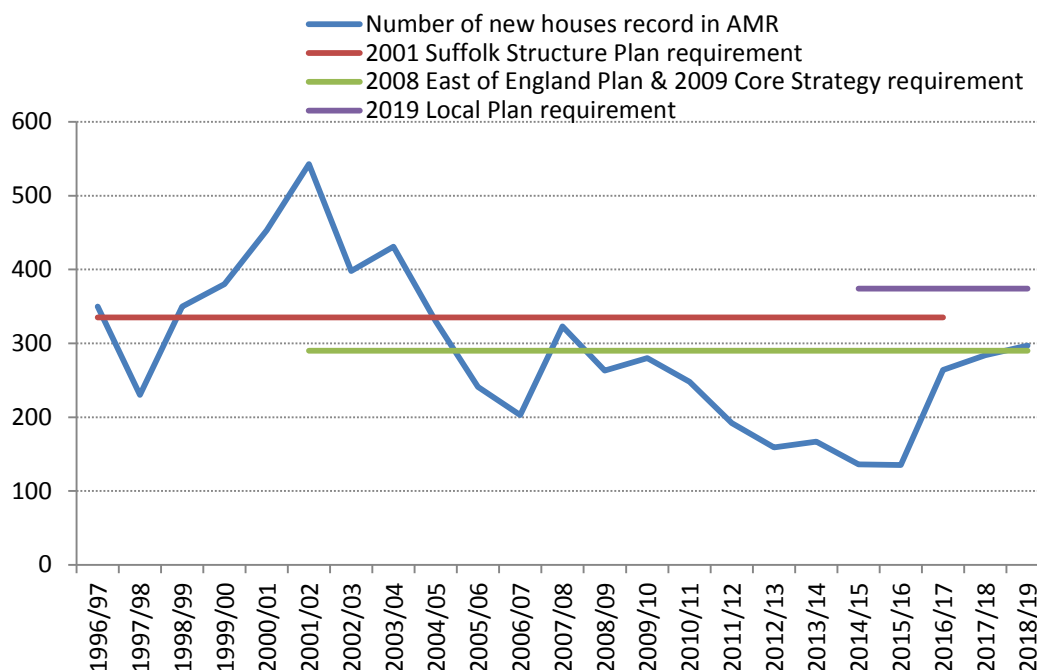


Fig.08 New homes recorded in Waveney's annual Authority Monitoring Reports

## 2011 and 2012 allocated sites in Waveney

1.54 The following table reviews housing allocations in the 'Site for Future Development: Site Specific Allocations' (2011) and 'Lowestoft Lake Lothing & Outer Harbour Area Action Plan' (2012).

Site reference	Number of dwellings allocated	Progress	Current status
LOW3	7 and other uses	The site delivered 11 affordable terrace houses and 12 affordable flats. Considered a success for delivering more houses early on in the plan period.	Completed
LOW4	34	20 No. 3 storey self contained flats, office, communal lounge and plant room and 3 No. houses and 6 No. 3 storey flats with associated car parking and works. Despite delivering C2 use class and not contributing towards housing delivery figures, the development is regarded as a success. The site delivered residential accommodation that met the community's needs.	Completed
LOW5	30	Considered a success for delivering early in the plan period.	Completed
LOW6	76	A former landfill site. The site had greater land contamination issues than known at allocation.	New proposals under development.
LOW7	60	Dependant on the existing rugby club finding a suitable alternative site. The Council is	Allocated for 65 dwellings in the Local Plan under

		providing on-going support and advice regarding alternative locations for the club.	policy WLP2.20
LOW8	50	CEFAS, the company that occupy the site no longer intends to relocate their offices and laboratory.	Not developed. Not allocated in Local Plan 2019.
LOW9	48	Site access issues. Resolved with Council assistance.	Work on site imminent.
BEC2	28	The site remains suitable for housing. Owned by a supermarket with no sign the site would come forward.	Not developed. Not allocated in Local Plan 2019.
BEC3	15	Delays due to land price expectations and sale of land negotiations.	Site largely completed for 20 dwellings including 12 affordable houses.
BUN1	35	Delays due to design quality, long outline permission negotiations to bring forward employment land, and long S106 negotiations due to unique site issues. Permission for 150 dwellings granted. At the reserved matters stage.	The site now forms part of a larger allocation in the Local Plan under policy WLP5.2 – Land West of St Johns Road, Bungay for 400 dwellings and employment land.
BUN2	8	The telephone exchange is still in use and no longer available for housing development	Not developed. Not allocated in Local Plan 2019.
BUN3	8	Site occupied by a community centre. Delays due to the community raising funds to build a new community centre.	Development expected.
HAL3	50	The existing playing fields are no longer being relocated.	Not developed. Not allocated in Local Plan 2019.
HAL4	40	Delays were caused by proposals for a supermarket which were contrary planning policy and refused. The site has now been marketed and sold for housing. A planning application for housing is expected in August 2019.	Allocation in Local Plan under policy WLP4.5
SOU2	30	Considered a success for delivering early in the plan period.	Completed
SSP3	1380	Delays due to sale price /value expectations exacerbated by the recession, complications due to the site being in multiple ownership, political issues (the application for this key site was submitted during a general election), and a complex S106 agreement. A portion of the site is under a long lease and not available for immediate development.	Outline permission for part of the site granted. Allocated in the Local Plan under policy WLP2.4
SSP5	40	Alternative uses have been permitted.	Not allocated in Local Plan 2019.
SSP6	57	Site access issues. Resolved with Council assistance.	Allocated in the Local Plan under policy WLP2.6
SSP7	50	Planning permission granted for 75 flats,	Delivery noted in 5 year

		library, commercial units and conversion of existing library into 5 flats.	land supply.
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*Fig. 09 Review of site allocations in the 'Site for Future Development: Site Specific Allocations' (2011) and 'Lowestoft Lake Lothing & Outer Harbour Area Action Plan' (2012).*

- 1.55 A number of housing developments completed in recent years across the former Waveney area have been considered a success for delivering early in the plan period, providing affordable homes, C2 residential accommodation that met the community's needs, or delivering more dwellings than allocated. The economic climate following the recession would have made relocating to larger sites or custom built facilities less attractive to businesses. Several sites have been excluded from the new Local Plan, however, some remain depending on individual circumstances and are considered deliverable and developable over the Plan period.
- 1.56 Where appropriate the Council seeks to enable wider community benefit and regeneration through housing allocations and other interventions. The Kirkley Waterfront and Sustainable Urban Neighbourhood allocation is the largest brownfield site in Lowestoft located in the heart of the town. The site has outline planning permission on the westerly part for 1,180 homes, a retail centre, leisure facilities and a primary school.<sup>29</sup> The easterly part of the site has been developed with new offices for Essex and Suffolk Water, East Suffolk Council and Suffolk County Council. Woods Meadow, a site in north Lowestoft, has outline planning permission for a mixed use development including 800 houses, a neighbourhood shopping centre, community hall, primary school, play areas and country park. The delay in granting planning permission was due to complex and protracted S106 negotiations which were necessary to secure community benefits. As a site for 800 new homes it will make a significant contribution to housing delivery in the area, but has not done so according to the original housing trajectory predictions.

### **The current Waveney area housing strategy: the new Waveney Local Plan**

- 1.57 Over the last four years the former Waveney District Council has focused resources on preparing a new Waveney Local Plan, which was adopted in March 2019.
- 1.58 The new Waveney Local Plan 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.

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<sup>29</sup> Waveney Local Plan 2019. Page 55.

	Core Strategy 2009	Local Plan 2019
Lowestoft area	70-80%  Focus on brownfield sites in central Lowestoft around Lake Lothing	56%  Focus on new community north of Lowestoft in Corton Parish and development south of Lowestoft in Carlton Colville, in addition to the regeneration of sites around Lake Lothing in central Lowestoft.
Beccles	15-25%	16%
Halesworth		8%
Bungay		6%
Southwold		4%
Rural Area	5%  (Expected windfall development in larger villages - no site allocations)	10%  (Site allocations in larger and smaller villages)

*Fig. 10 Housing strategy and scale of growth in Waveney*

- 1.59 The new Local Plan has sought to introduce changes to the spatial strategy and allocation of sites designed to address historic reasons for under delivery. This needs to be viewed in the context of the annual housing requirement for the Waveney Local Plan being higher than that contained in the Waveney Core Strategy.
- 1.60 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.
- 1.61 Under the Housing Delivery Test Measurement Rule Book, the 2012-based and 2014-based household projections have been used to measure housing delivery due to the age of the Core Strategy. It will not be possible for the 2019 Housing Action Plan to fully assess the effectiveness of the new Waveney Local Plan 2019 spatial strategy in delivering housing, as it has not been adopted long enough for any meaningful data to be collected. However, monitoring of housing delivery against the housing trajectory in the Local Plan will be undertaken as the Plan is implemented.

## Neighbourhood Plans

- 1.62 Eight Neighbourhood Plans have been made across East Suffolk with a further 27 having had the Neighbourhood areas designated with work progressing but at various stages. Some Neighbourhood Plans allocate land for housing while others do not.
- 1.63 East Suffolk Council commits significant time to supporting Neighbourhood Plan groups through 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.
- 1.64 The first Neighbourhood Plan 'made' in Suffolk was the Rendlesham Neighbourhood Plan in 2015 which received an RTPI East of England Award for Planning Excellence.
- 1.65 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. Plans that are in progress, such as for Bredfield and Wickham Market, are also identifying site allocations. The emerging Suffolk Coastal Local Plan identifies a total of 420 additional dwellings to be planned for through Neighbourhood Plans.
- 1.66 Whilst the Council supports those producing Neighbourhood Plans in bringing forward positive strategies to deliver housing, including housing allocations, the Council acknowledges that the preparation and content of these Plans is ultimately outside of its remit. This is recognised in the Suffolk Coastal Final Draft Local Plan which states that where positive strategies for the delivery of housing are not forthcoming in a timely way the Council may consider it appropriate to allocate land for housing through a future Local Plan review. Nevertheless, where 'made' Neighbourhood Plans are in place the Council can support delivery through for example determination of planning applications. Where development is central to the strategy of the Local Plan and there is a designated neighbourhood area, as is the case with the Saxmundham Garden Neighbourhood, the Local Plan has allocated sites. The additional housing growth for Leiston and Framlingham is expected to be delivered later in the plan period.

Neighbourhood plan area	Indicative minimum number of dwellings <sup>30</sup>
Aldringham cum Thorpe	Existing Local Plan allocation of 40 dwellings, plus small scale additional development and windfall
Bredfield	20
Earl Soham	25
Easton	20
Framlingham	100 in addition to allocations in 'made' neighbourhood plan
Great Bealings	Housing development as per countryside policies
Kelsale cum Carlton	20

<sup>30</sup> In addition to existing permissions, allocations and dwellings with resolution to grant (as at 31.3.18). See Table 3.5.

Kesgrave	20
Leiston	100 in addition to allocations in 'made' neighbourhood plan
Martlesham	20. This is in addition to allocation SCLP12.25.
Melton	Existing Neighbourhood Plan allocation of 55, plus windfall
Playford	Housing development as per countryside policies
Rendlesham	Existing Local plan allocations of 100, plus windfall
Saxmundham	Small scale additional development and windfall. This is in addition to Local Plan allocation SCLP12.26 which allocates land for the South Saxmundham Garden Neighbourhood which will deliver 800 dwellings <sup>31</sup> .
Wenhaston with Mells Hamlet	25
Wickham Market	70 This is in addition to Local Plan allocation SCLP12.61 (in Pettistree Parish, adjoining Wickham Market)

*Fig.11 Table in Policy SCLP12.1: Neighbourhood Plans, emerging Suffolk Coastal Local Plan: Final Draft 2019*

- 1.67 To date there is only one 'made' Neighbourhood Plan in the former Waveney area which is the Kessingland Neighbourhood Plan. Kessingland is designated a 'larger village' within the Waveney Local Plan settlement hierarchy, however the Local Plan does not contain any housing allocations in the village. The Kessingland Neighbourhood Plan sets out a vision for the community until 2030. The plan was adopted in November 2016, in advance of the Waveney Local Plan adoption in March 2019, and includes allocations for housing, an Early Years Centre, and a care facility. The 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.
- 1.68 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. Neighbourhood Plans for Beccles, Bungay, Halesworth, Mutford, Reydon, Southwold and Worlingham are at an advanced stage of development with public consultations underway or imminent. 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.

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<sup>31</sup> The South Saxmundham Garden Neighbourhood is within the Benhall Parish and Saxmundham.



## Forecasting delivery

- 1.69 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. However, as the data underpinning the calculation of the annual housing need figure will change over time, there are uncertainties involved in forecasting long term Housing Delivery Test results. Further, the results are dependent upon annual completions, and whilst the Council can anticipate completions with some confidence, based upon the housing trajectories set out in the Statement of Housing Land Supply, it is not possible to determine future outcomes with accuracy. Nevertheless, 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. The Council is committed to the ongoing delivery of the Housing Action Plan, and therefore intends to continue to monitor and evolve the Plan regardless of future Housing Delivery Test results.
- 1.70 As East Suffolk has a recently adopted Local Plan for the former Waveney area and is well advanced in the preparation of the Suffolk Coastal Local Plan, the focus for the Council is to be on the implementation of the two Local Plans including the delivery of the sites allocated within the Local Plans.
- 1.71 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 2015-16, 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 1<sup>st</sup> April and should use the affordability ratio from the previous year.
- 1.72 The 2018 Housing Delivery Test results, as published by the Government in February 2019, are as follows:

LPA	Number of homes required <sup>32</sup>				Number of homes delivered				HDT result
	2015-16	2016-17	2017-18	Total	2015-16	2016-17	2017-18	Total	
Suffolk Coastal	465	465	392	1,322	564	550	582	1,696	128%
Waveney	312	313	299	925	133	243	293	669	72%

Fig. 12 Housing Delivery Test results published in February 2019<sup>33</sup>

- 1.73 The 2019 Housing Delivery Test results, due to be published by the Government in November 2019, are expected to continue to assess the former Suffolk Coastal and Waveney areas separately. The Planning Practice Guidance<sup>34</sup> states that, where local government reorganisation has taken place, the Housing Delivery Test would continue to be calculated for former Council areas for one year after reorganisation. Therefore it is anticipated that East Suffolk will be assessed as one local planning authority from 2020 onwards.
- 1.74 The 2019 Housing Delivery Test results (anticipated to be published in November) can be anticipated with some accuracy as the completions figures and housing need figures are known. The likely outcome for the former Suffolk Coastal area is a result of over 100%, and there would therefore be no requirement to produce a Housing Action Plan or take any other measures.

#### The 2019 forecasted result for the former Suffolk Coastal area

- The calculation uses the Core Strategy requirement of 465 dwellings per year for 2016-17, as per the February 2019 calculation;
- The transitional method of applying household projections for the number of homes required is used for 2017-18.
- The minimum annual local housing need figure as at 1<sup>st</sup> April 2018, using the house price to workplace based earnings ratio for the previous year (i.e. 2017) is used. This produces a figure of 515 dwellings per year for 2018-19.
- The housing completion figure of 588 for 2018-19 is used.

<sup>32</sup> Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures in relation to the calculation of annual housing need under the standard methodology.

<sup>33</sup> 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.

<sup>34</sup> Planning Practice Guidance, Paragraph: 046 Reference ID: 68-046-20190722 <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test>

LPA	Number of homes required				Number of homes delivered				2019 HDT result
	2016-17	2017-18	2018-19	Total	2016-17	2017-18	2018-19	Total	
Suffolk Coastal	465	392	515 <sup>35</sup>	1,372	550	582	588	1720	124%

*Fig. 13 Housing Delivery Test 2019 forecast for the former Suffolk Coastal area*

- 1.75 The Waveney Local Plan adopted in March 2019 set the target of 374 dwellings a year for the period 2014-2036. Under the Housing Delivery Test Rule Book, as the housing need figure calculated under the standard method as at 1<sup>st</sup> April 2018 for the Waveney area is lower than the housing requirement in the Local Plan (370 dwellings rather than 374), this would be used to calculate the Housing Delivery Test.
- 1.76 The impact of the new housing strategy in the Waveney Local Plan will take time to result in new completed homes that will impact the Housing Delivery Test result. 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 their 5-year land supply calculations. The forecasted result for the former Waveney area is approximately 85%. It is expected that there will therefore continue to be a requirement to produce a Housing Action Plan for the former Waveney area under the forthcoming 2019 results, and it is uncertain whether the requirement for a 20% buffer to the 5 year land supply will continue to apply in the foreseeable future.

#### The 2019 forecasted result for the former Waveney area

- Paragraph 17 of the Housing Delivery Test Rule Book states that adopted housing requirements should apply from the start of the plan period, which in the case of Waveney is 2014. It is therefore relevant to consider the adopted housing requirement of 374 dwellings per year in relation to the minimum household projections (under the transitional arrangements) for the years 2016-17 and 2017-18, and in relation to the minimum annual housing need for the year 2018-19.
- The household projections, of 313 and 299, are lower than the adopted housing requirement for the years 2016-17 and 2017-18 and therefore these are applied.
- The minimum annual housing need figure, of 370 dwellings per year, calculated under the standard method, is lower than the adopted housing requirement for the year 2018-19.
- The housing completion figure of 297 for 2018-19 is used.

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<sup>35</sup> The housing need figure as calculated at 1<sup>st</sup> April 2018, as per the Housing Delivery Test Rule Book paragraph 15.

LPA	Number of homes required				Number of homes delivered				2019 HDT result
	2016-17	2017-18	2018-19	Total	2016-17	2017-18	2018-19	Total	
Waveney	313	299	370 <sup>36</sup>	982	243	293	297	833	85%

*Fig. 14 Housing Delivery Test 2019 forecast for the former Waveney area*

1.77 As stated above, it is anticipated that the results to be published in November 2020 would provide a single result for East Suffolk. It is not possible to predict with certainty the outputs of the 2020 Housing Delivery Test however it is possible that the results could be close to 100% and therefore there would be no formal consequences for the East Suffolk area. It should be emphasised that the calculation below is an estimate and is produced for the purposes of illustrating a potential outcome only.

#### The potential 2020 result for East Suffolk

- It is anticipated that the Suffolk Coastal Plan is adopted in early 2020.
- The transitional arrangements relating to use of household projections is used for the number of homes required in 2017-18, as set out in the calculations above.
- The minimum annual housing need figures for 2018-19 are used, as set out in the individual calculations above.
- The minimum annual housing need figures calculated under the standard method as at 1<sup>st</sup> April 2019 would be 542 dwellings per annum for the former Suffolk Coastal area and 368 dwellings per annum for the former Waveney area. The Suffolk Coastal Final Draft Local Plan sets out a requirement of 582 dwellings per year and the adopted Waveney Local Plan contains a housing requirement of 374 dwellings per year. Under the requirements of the Housing Delivery Test Rule Book the lower figures are those calculated under the standard methodology and therefore these would apply. This would create a combined housing delivery target of 910 dwellings a year for 2019-20.
- The combined housing completion figure of 885 (297 for the Waveney area and 588 for the Suffolk Coastal area) for 2018-19 is used.
- The projected figures in the Statement of Housing Land Supply (published in August 2019) are used to estimate 2019-20 completions.

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<sup>36</sup> The housing need figure as calculated at 1<sup>st</sup> April 2018, as per the Housing Delivery Test Rule Book paragraph 15.

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	
East Suffolk	691	885	910	2486	875	885	803	2563	103%

*Fig. 15 Housing Delivery Test 2020 forecast for East Suffolk*

- 1.78 The forecasts suggest an improvement in the Housing Delivery Test over time. Nevertheless, the Council has made a commitment to produce an annual Housing Action Plan for the East Suffolk local planning 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.

## Analysis of national housing delivery information

- 1.79 The current Government considers the UK housing market to be in crisis and this is the result of ‘not enough local authorities planning for the homes they need; house building that is simply too slow; and a construction industry that is too reliant on a small number of big players.’<sup>37</sup>
- 1.80 The Ministry of Housing, Communities & Local Government (MHCLG) annually publishes reports that show the full extent of the housing situation in England. There are an estimated 24.2 million dwellings in England. Since 2002 housing stock has increased annually by 135,000 to 224,000 dwellings or 0.59% and 1.00%. Delivery of housing reached a peak in 2007-8, decreased during the recession, but has been on the increase since 2012-13. The majority of new homes come from new build properties. However, change of use to residential, conversions between houses and flats, ‘other gains’ (caravans, house boats etc.), and ‘permitted development rights’ all contribute significantly to the housing stock.<sup>38</sup>
- 1.81 The percentage of the total number of owner occupier dwellings increased steadily from the 1980s to 2002, reaching a peak of 69.5%. It then declined to 62.4% in 2014, and then started to rise again so it stood at 63.2% in March 2018.<sup>39</sup> Local Authorities currently own 38% of all social housing stock. Historically there has been a decline in Local Authority ownership due to the large-scale transfer of housing stock to Private Registered Providers, Right to Buy sales and demolitions.<sup>40</sup> There are 1.11 million households on local authority waiting lists.<sup>41</sup>
- 1.82 For planning purposes an affordable home is defined in the National Planning Policy Framework (2018). The report on ‘Affordable Housing Supply: April 2017 to March 2018 England’ defined an affordable home as ‘provided to specified eligible households whose needs are not met by the market’ and noted almost half of the affordable homes were funded through Section 106 agreements and 90% were new build properties. There has been an increase in delivery of affordable homes and they accounted for 21% of the total new homes delivered during the year April 2017-March 2018. Currently there are 8.5 affordable homes per 10,000 population.<sup>42</sup>

### Housebuilders

- 1.83 Small and medium housebuilders (SME) have historically built the most homes, but their numbers have been in decline since the 1980s and were particularly affected by the economic crisis in 2008<sup>43</sup>.

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<sup>37</sup> DfCLG, (2017) Fixing our broken housing market, p9.

<sup>38</sup> MHCLG (15 November 2018) *Housing Supply; net additional dwellings, England: 2017-18*

<sup>39</sup> MHCLG. (24 May 2019) *Dwelling Stock Estimates: 31 March 2018*.

<sup>40</sup> MHCLG (24 January 2019) *Local authority housing statistics: Year ending March 2018*.

<sup>41</sup> MHCLG (24 January 2019) *Local authority housing statistics: Year ending March 2018*.

<sup>42</sup> MHCLG (22 November 2018) *Affordable Housing Supply: April 2017 to March 2018 England*.

<sup>43</sup> LGIU (2016), *Small is beautiful: Delivering more homes through small sites*, p3.

The number of builders producing 30 units or less a year has halved since 2008 and the number of medium builders has reduced by 60%.

- 1.84 A survey by the Federation of Master Builders (FMB) identified various problems that can have a disproportionate affect on SME builders compared to large volume housebuilders<sup>44</sup>. These include Local authorities allocating fewer small sites, delays and uncertainties in the planning process exacerbated by more risk adverse junior staff handling small site applications,<sup>45</sup> pre-commencement planning conditions used to move issues further down the line,<sup>46</sup> and slow S106 agreements negotiations.<sup>47</sup>
- 1.85 Large sites are currently dominated by major, volume housebuilders who are reportedly causing concern regarding land banking, intentional delay and slow build out rates. In 2006 the top ten firms built almost half the houses and by 2014 large house builders built 70% of homes.<sup>48</sup> Research into large sites of over 1,000 units found the median build out period is 15.5 years at a rate of 6.5% of the site a year. There is also a negative relationship between the size of site and percentage built out each year.
- 1.86 A significant problem is that even when local authorities grant planning permission for housing ‘there is a large gap between permissions granted and new homes built. More than a third of new homes that were granted planning permission between 2010/11 and 2015/16 have yet to be built.<sup>49</sup> A review of large sites found the ‘homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out.’<sup>50</sup>
- 1.87 The Government’s 2017 White Paper, *Fixing our Broken Housing Market*, recommends Local Authorities are supported through higher planning application fees, funding to develop planning departments, simplified plan-making, more funding for infrastructure, and powers to make it easier to act against those who do not build permissions. Local Authorities are also encouraged to use bespoke housing deals, update their plan and decide applications promptly.
- 1.88 Sir Oliver Letwin’s *Independent Review of Build Out: Final Report (2018)* recommends in the long term new planning rules and the establishment of a National Expert Committee. The report recommends, in the short term, incentives to diversity sites of 1,500 dwellings that are located in areas of high demand, and securing improvements through Section 106 agreements. Recommendations for local planning authorities with high housing demand include the power to create master plans and design codes to promote diversity and good design, and statutory powers to

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<sup>44</sup> LGIU (2016), *Small is beautiful: Delivering more homes through small sites*, p19.

<sup>45</sup> LGIU (2016), *Small is beautiful: Delivering more homes through small sites*, p4 & p18.

<sup>46</sup> LGIU (2016), *Small is beautiful: Delivering more homes through small sites*, p19.

<sup>47</sup> LGIU (2016), *Small is beautiful: Delivering more homes through small sites*, p18.

<sup>48</sup> LGIU (2016), *Small is beautiful: Delivering more homes through small sites*, p9.

<sup>49</sup> DfCLG, 2017, *Fixing our broken housing market*, p13

<sup>50</sup> Letwin, O (October 2018) *Independent Review of Build Out: Final Report*.

create/allocate, purchase and control the development of large sites through a Local Development Company.



## Identifying Issues across East Suffolk

1.89 The Council understands that there are several key possible reasons for the under delivery of housing in the former Waveney area, as explained in Section 1.6 above;

- 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.

1.90 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.

1.91 An initial review of national housing policy, strategy and reports have 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.

### Indicators

1.92 Based on a review of local housing delivery, national housing information and existing Action Plans, and taking a proportionate approach to the gathering of information, it has been considered beneficial to gather and review information on the following-

- Sites that have completed in the last five years.
- Sites that have planning permission.
- Sites that are allocated in local plans.

- Site with lapsed planning consents.
- The size (number of units) of completed, permitted and allocated sites.
- The typology the sites (greenfield and brownfield).
- The length of time spent determining planning applications.
- The length of time from planning consent to work starting on site.
- Barriers to development (as identified in the 5 year housing land supply questionnaire)

# 2 Housing Delivery Analysis

## Analysis of the size of housing developments in East Suffolk

2.1 Sir Oliver Letwin’s definition of a large site is 1,500 or more units in size. There are only two sites in East Suffolk, the North Felixstowe Garden Neighbourhood in the emerging Suffolk Coastal Local Plan and Brightwell Lakes which currently has outline planning permission, which meet this definition. There are none in the former Waveney area. The Local Democratic Think Tank in partnership with Federation of Master Builders<sup>51</sup> considers small sites to be those of 1.5 hectares or less, or those for 30 units or less. Developments of less than 10 units or 0.5ha are exempt from affordable housing contributions. It is therefore considered appropriate to regard this type of site as an individual category.

2.2 The size of developments in East Suffolk are best categorised as;

- small sites of 0-9 units,
- medium site of 10-49 units,
- large site of 50-499 units, and
- 500+ units.

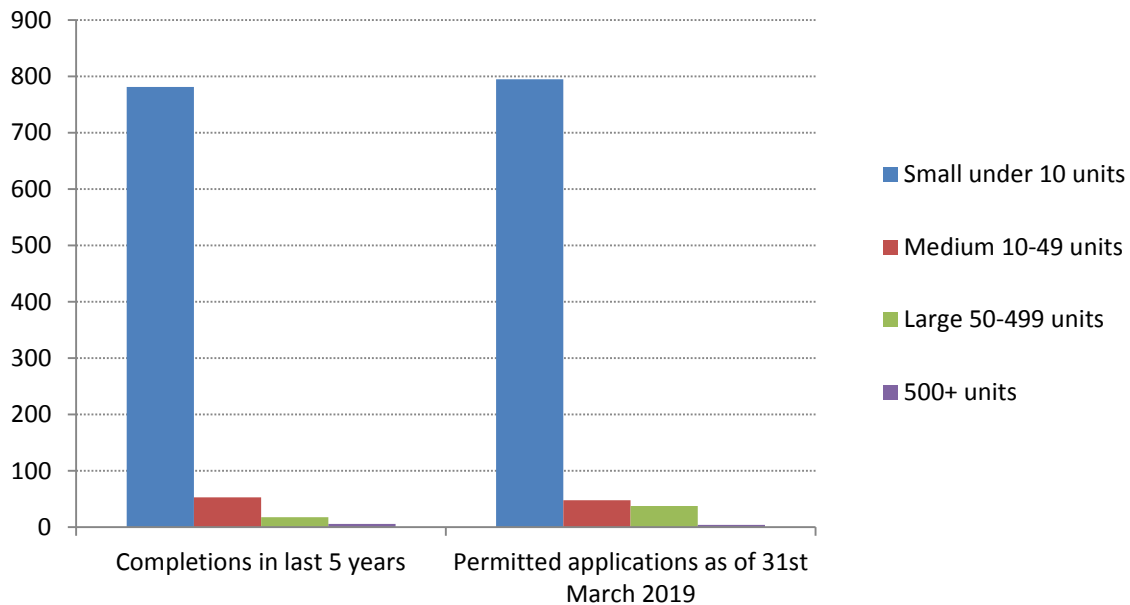


Fig. 16 Number of housing developments per size of site in East Suffolk

<sup>51</sup> LGIU (2016), Small is beautiful: Delivering more homes through small sites

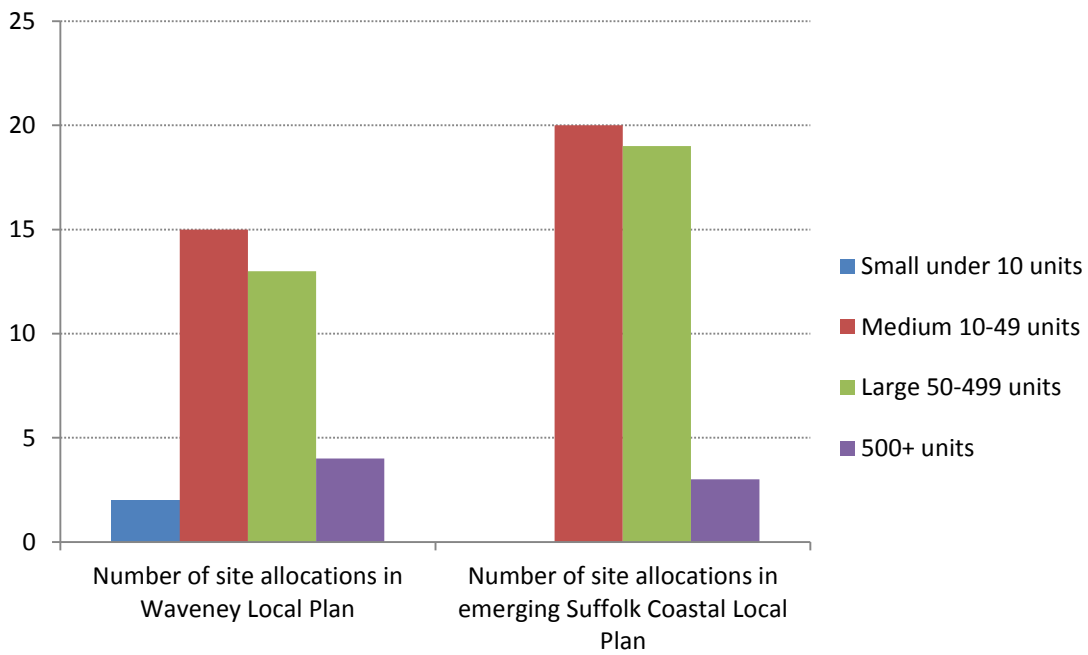


Fig. 17 Size of housing developments allocated in Local Plans

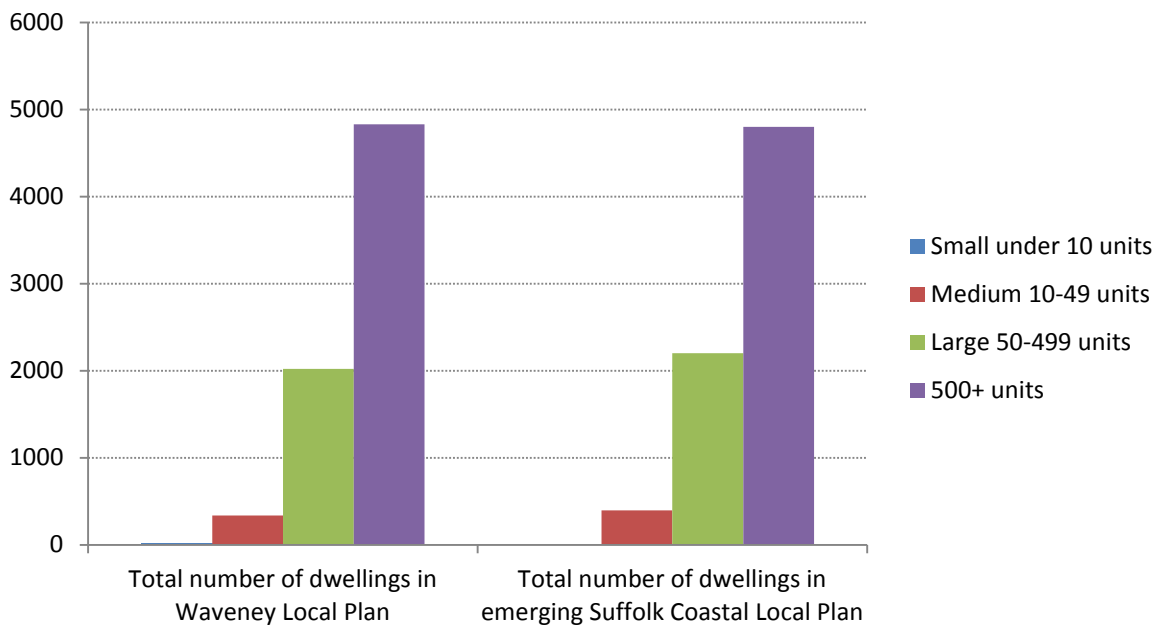


Fig. 18. Total number of dwellings allocated on different sizes of sites in the Local Plans (including existing allocations that have been carried forward)

2.3 The review of site size considers the allocations in the current Waveney Local Plan (2019) and the emerging Suffolk Coastal Local Plan (2019), which has been submitted for examination. Both Local Plans include previously allocated sites (and consented sites which have not commenced) which have been carried forward as they are still considered available and suitable for development. It is acknowledged that there are existing permissions which are also being developed, and that the

Housing Action Plan will need to apply to the delivery of these also as these make up a valuable contribution to supply.

- 2.4 Overall delivery and supply across East Suffolk is reasonably balanced, with the graphs above showing a large number of small windfall sites being completed and permitted, and with larger sites being allocated coming forward as allocations. The graphs show that small sites form the majority of the applications being submitted and sites being developed. In both Local Plans the largest number of site allocations are for medium and large sites. Whilst few sites of 500 or more units are allocated in the former Suffolk Coastal and Waveney areas, they will contribute a significant number of new dwellings.

### Sites with 500+ units

- 2.5 The largest allocated sites in the former Waveney area are;
- WLP2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood 1,380 new dwellings.
  - WLP2.13 – North of Lowestoft Garden Village 1,300 new dwellings.
  - WLP2.16 – Land South of The Street, Carlton Colville/Gisleham 900 new dwellings.
  - WLP3.1 – Beccles and Worlingham Garden Neighbourhood 1,250 new dwellings.
- 2.6 The largest sites in the former Suffolk Coastal area are;
- Core Strategy SP20 and Policy SCLP12.19 of the emerging Local Plan – 2,000 new dwellings at Brightwell Lakes.
  - SCLP12.3 of emerging Local Plan – North Felixstowe Garden Neighbourhood 2,000 new dwellings (including the 560 consented homes at Land north of Candlet Road)
  - SCLP12.29 of emerging Local Plan - South Saxmundham Garden Neighbourhood 800 new dwellings
- 2.7 Outline planning permission has been granted for 1,180 new homes on part off the Kirkley Waterfront site. As part of the Local Plan, the Council has prepared a master plan for the Beccles and Worlingham Neighbourhood and is liaising with the developers of part of the site. Brightwell Lakes, has been granted outline planning permission and reserved matters applications have been submitted for its first phases. Within the emerging North Felixstowe Garden Neighbourhood part of that allocation already benefits form outline planning permission for 560 homes.

### Large Sites (50-499 units)

- 2.8 There are 13 large sites in the Waveney Local Plan providing a total of 2,022 new dwellings. Approximately half the sites are located in the market towns of Halesworth, Bungay and Beccles.

Several of the sites are located in areas around Lowestoft. There are 19 large sites in the emerging Suffolk Coastal Local Plan providing 2,199 new dwellings.

- 2.9 The Leiston Neighbourhood Plan allocates a further 4 sites within this size category, totalling 390 dwellings (with either outline or full planning permission granted on each), and the Melton Neighbourhood Plan allocates one site for 55 dwellings. The Kessingland Neighbourhood Plan also allocates a site within this size category.

### Medium Sites (10-49 units)

- 2.10 There are a total of 15 medium sites in the Waveney Local Plan providing a total of 335 new dwellings. The majority of these sites are located in villages. There are a total of 20 medium sites in the emerging Suffolk Coastal Local Plan providing 395 new dwellings.
- 2.11 The Framlingham Neighbourhood Plan allocates 4 sites in this category, totalling 90 dwellings (with either outline or full planning permission granted on 3 sites). The Kessingland Neighbourhood Plan allocates 2 sites within this size category.

### Small Sites (0-9 units)

- 2.12 There are 2 small sites allocated in the Waveney Local Plan in small villages providing a total of 14 new dwellings and no small sites allocated in the emerging Suffolk Coastal Local Plan.
- 2.13 The Framlingham Neighbourhood Plan allocates 2 small sites, totalling 15 dwellings (with permission granted on one site).
- 2.14 East Suffolk has a predominantly rural character with many small, dispersed clusters of dwellings and communities located outside the defined settlement boundaries of Small Villages and Large Villages. Whilst these communities in the Countryside do not have the services and facilities to support large housing developments, there are opportunities for small scale windfall developments to come forward. There are also opportunities within settlement boundaries for urban infilling to provide small scale development opportunities.
- 2.15 The Waveney Local Plan has several specific policies intended to assist in bringing forward small windfall sites that would potentially appeal to small developers or self-build.
- WLP8.4 – Conversion of Properties to Flats,
  - WLP8.6 – Affordable Housing in the Countryside,
  - WLP8.7 – Small Scale Residential Development in the Countryside,
  - WLP8.11 – Conversion of Rural Buildings to Residential Use, and
  - WLP8.33 – Residential Gardens and Urban Infilling.

2.16 The adopted Suffolk Coastal Core Strategy and Development Management Policies (2013) has several policies that would facilitate small windfall sites and other forms of housing developments not specifically covered in the allocations including:

- SP22 – Aldeburgh
- SP23 – Framlingham
- SP24 – Leiston
- SP25 – Saxmundham
- SP26 - Woodbridge
- SP27 – Key and Local Service Centres
- SP28 – Other Villages
- SP29 – The Countryside
- DM1 – Affordable Housing on Exception Sites
- DM3 – Housing in the Countryside
- DM4 – Housing in Clusters in the Countryside

2.17 The emerging Suffolk Coastal Local Plan also has policies to assist small windfall developments including:

- SCLP5.1 – Housing development in large villages
- SCLP5.2 – Housing development in small villages
- SCLP5.3 – Housing in the countryside
- SCLP5.4 – Housing in clusters in the Countryside
- SCLP5.5 – Conversions of Buildings in the Countryside for Housing
- SCLP5.7 – Infill and Garden Development
- SCLP5.11 – Affordable Housing on Exception Sites

2.18 Monitoring the use of newly adopted policies including the number of applications approved and the number of dwellings completed will determine whether they are successful in the long term in assisting small scale developments.

## Site Sizes Summary

2.19 One of the key recommendations made by Oliver Letwin is to give local planning authorities with high housing demand the power to create master plans and design codes to promote diversity and good design. A masterplan has already been created for the Beccles and Worlingham Garden Neighbourhood by the Council to inform its Local Plan allocation and this principle could be extended to other larger sites.

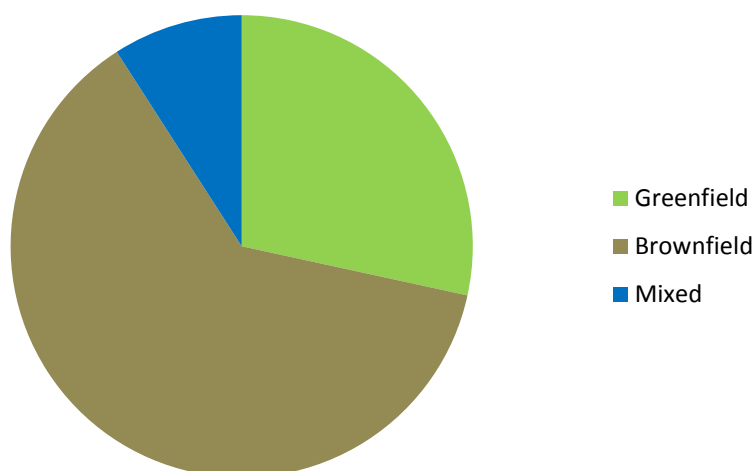
2.20 The report, *Small is beautiful: Delivering more homes through small sites (2016)*, recommends the use of 'Co-ordinating Codes' as developed by the Bartlett School of Planning. East Suffolk will be

preparing development / design briefs for allocated smaller sites which could help to provide an opportunity to attract a wider range of housebuilders to the area, promote a diverse housing supply and encourage good design.



## Analysis of Housing on Previously Developed Land

- 2.21 Greenfield sites are generally considered to be cheaper, faster and more straight-forward to develop. The Council recognises that many sites in East Suffolk that do not meet the National Planning Policy Framework (2018) definition of ‘previously developed’ land, have additional costs associated with the demolition of agricultural buildings. Previously developed sites often have buildings that require demolition, land with contamination issues, and if located with an urban area, there can be site access issues. Greenfield sites are therefore regarded by developers and investors as a more attractive development prospect.
- 2.22 East Suffolk is rural in character with a limited number of remaining brownfield sites available for regeneration and housing development. With the exception of the Lake Lothing area of Lowestoft, previously developed sites are generally modest in size. To deliver the housing needed, greenfield sites therefore make up a significant amount of supply, however the Council recognises the need to continue to support and promote appropriate redevelopment of previously developed land alongside this.
- 2.23 In the former Suffolk Coastal area the proportion of housing allocations on greenfield sites has remained consistently high due to its limited number of vacant brownfield sites and active employment areas. However, the emerging Local Plan has taken opportunities to allocate previously developed land where available on a small number of sites which individually provide a relatively large number of dwellings. In the former Waveney area the number of new dwellings allocated on greenfield sites has increased from approximately 30% to 70% between 2011 and 2019. This represents a significant change in housing strategy in the area that is necessary to meet new housing targets, should appeal to future investors and developers, and should improve the speed of housing delivery.



*Fig. 19 Number of dwellings allocated in Waveney 'Sites for Future Development' 2011*

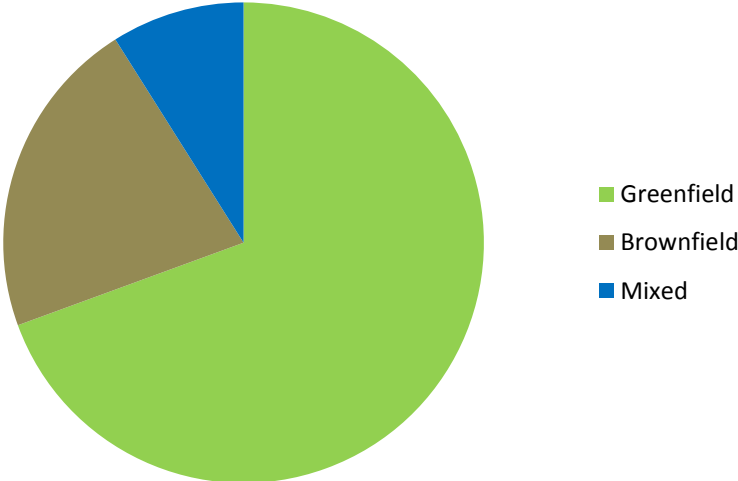


Fig. 20 Number of dwellings allocated in Waveney Local Plan 2019

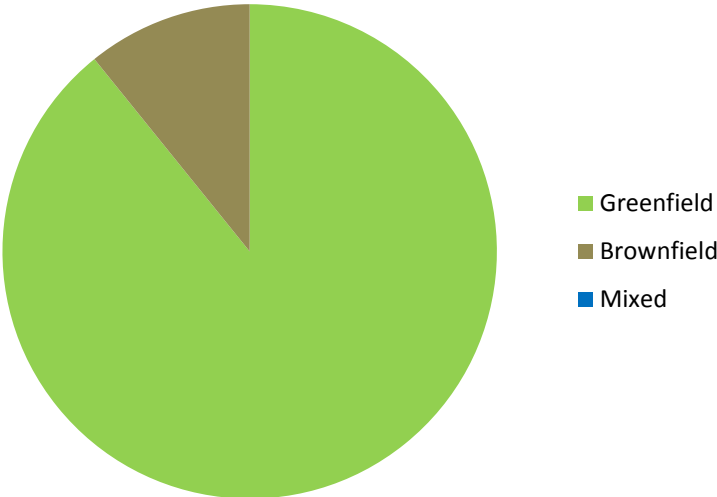


Fig. 21 Number of dwellings allocated in Suffolk Coastal - Site Allocations and Area Specific Policies 2017

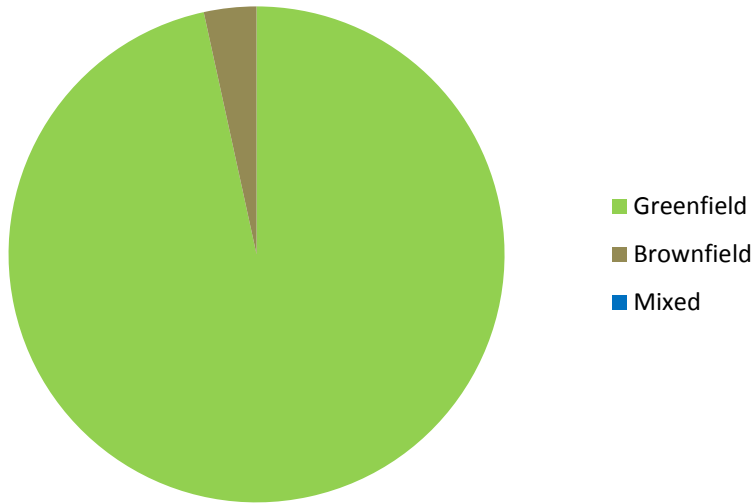


Fig. 22 Number of dwellings allocated in Suffolk Coastal - Felixstowe Peninsula Area Action Plan 2017

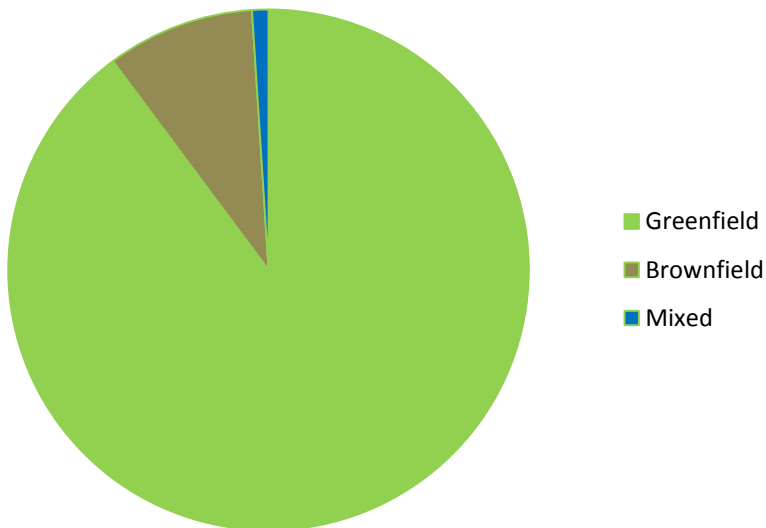
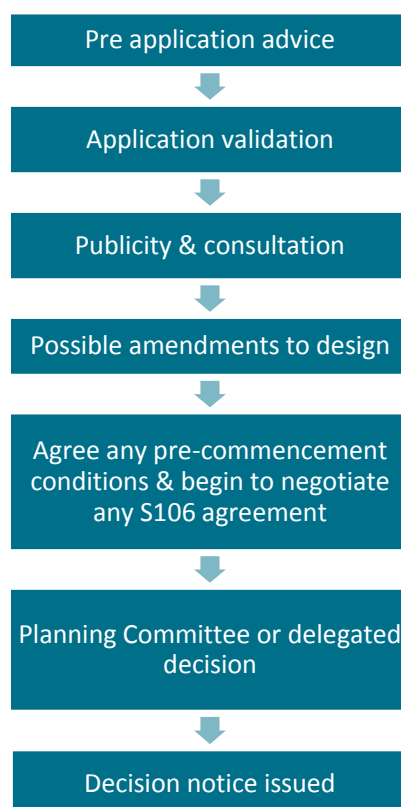


Fig. 23 Number of dwellings allocated in emerging Suffolk Coastal Local Plan 2019

## Analysis of time spent determining applications

- 2.24 To accompany the analysis of policy above, it is also necessary to consider the process of determining planning applications, as this can also impact on the delivery of housing, in particular the time taken for sites to be delivered.
- 2.25 The planning process follows a similar pattern for all applications as detailed below. Pre application advice<sup>52</sup> is not compulsory but is highly recommended for all housing applications. It can reduce the number and complexity of issues that need resolving during the application process, enables quicker and more proactive decision making, and it increases the likelihood of a positive outcome.
- 2.26 Planning applications must be validated to ensure that all the necessary information has been submitted, a notice is displayed on or near the site for 21 days, and there is a public consultation with statutory consultees notified. The Council supports the submission of additional information or minor revisions that would improve and make an application acceptable. 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.



*Fig. 24 Key steps for major planning applications*

<sup>52</sup> <https://www.eastsuffolk.gov.uk/planning/planning-applications/pre-application-planning-advice/>

2.27 The Government has set the statutory time limit of 13 weeks for determining major developments (see definition below) and eight weeks for all other developments. A 16 week limit applies to applications subject to an Environmental Impact Assessment. Where the statutory limits have been exceeded without an agreed extension, the government requires that the planning fee may be returned if a decision has not been made within 26 weeks.

2.28 For housing, any application of 10 or more units, an unknown number of units on 0.5 hectares or more, or development on 1 hectare or more, is classed as a major development.<sup>53</sup> 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 amounts of time it takes to determine a planning application.

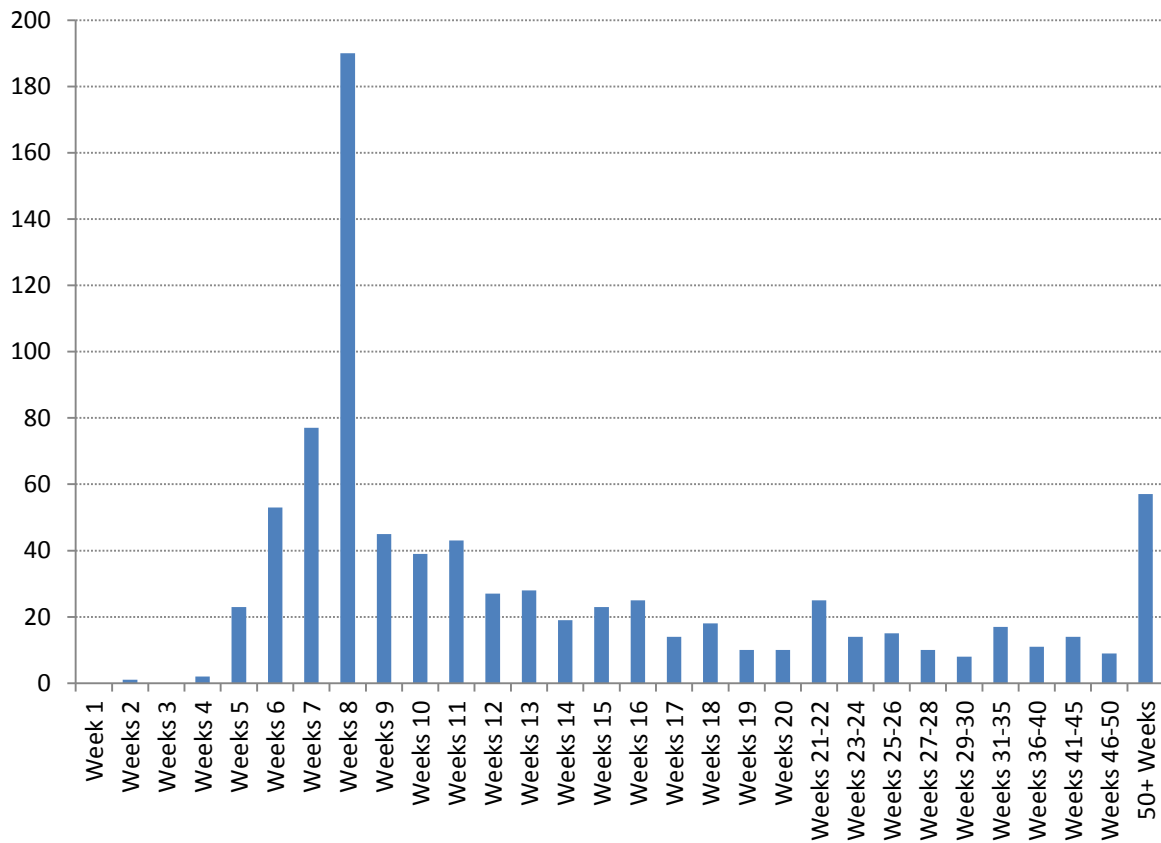


Fig. 25 Length of time in weeks to determine housing planning applications in former Suffolk Coastal and Waveney areas – Data relates to any permissions with dwellings outstanding (i.e. not started or not fully complete) as at 31st March 2019

<sup>53</sup> The Town and Country Planning (Development Management Procedure) (England) Order 2010, Part 1 Preliminary, 2, <http://www.legislation.gov.uk/uksi/2010/2184/made>

2.29 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. Approximately 36% of all permitted housing developments took longer than 13 weeks to determine. 78% of sites are classed as small with less than 10 units. 58% of sites are greenfield site, 41% previously developed sites and the remainder on mixed sites.

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

2.31 Long periods of time to determine a planning application can result from a number of issues, such as the following:

- An application submitted with sufficient information for it to be considered valid, but insufficient for the application to receive planning approval.
- The need for amendments to the design or technical supporting documents to enable decision making.
- A lack of pre-application advice to address complex issues.
- The need to negotiate a S106 agreement.
- Fluctuating workloads in the Planning Service.
- Staff vacancies.

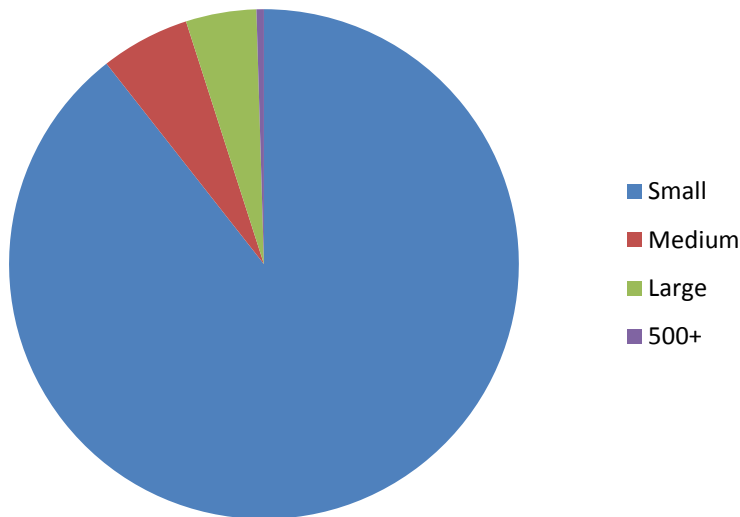
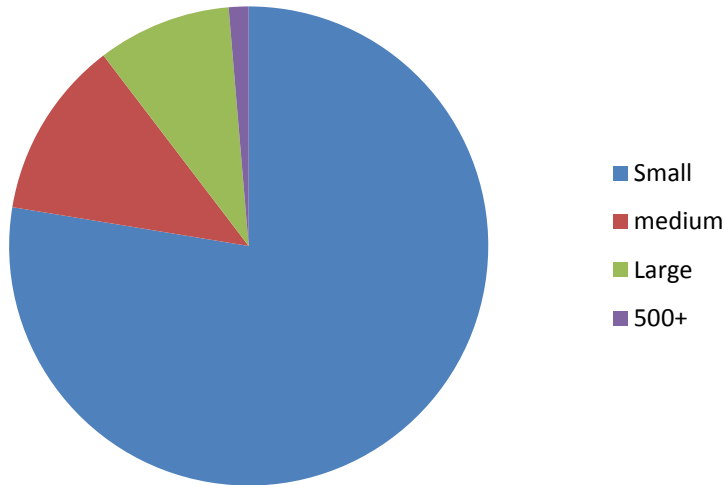
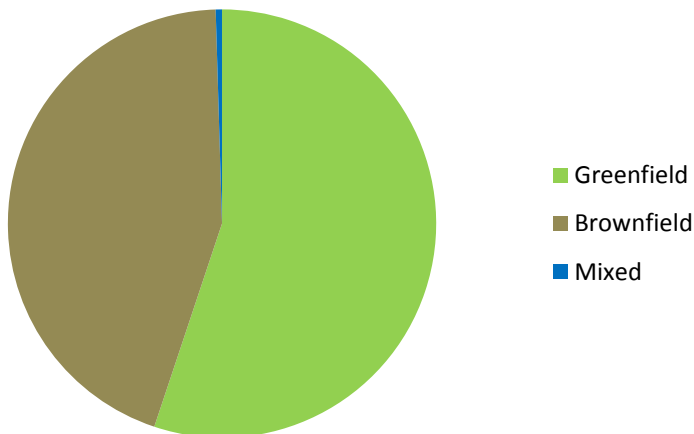


Fig.26 Site size –outstanding permissions as at 31<sup>st</sup> March 2019

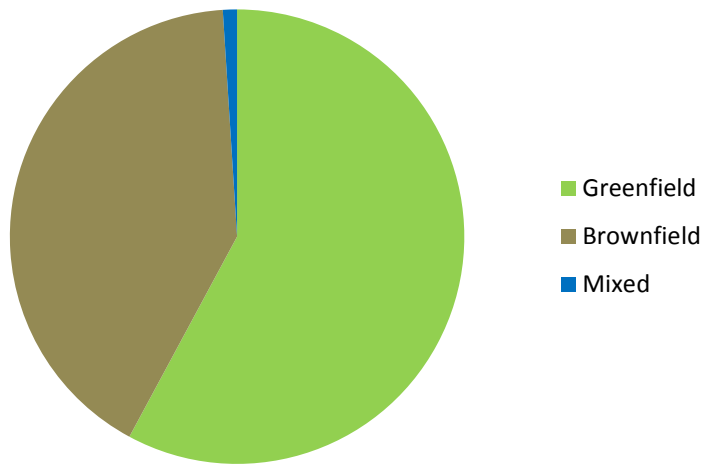


*Fig. 27 Size of sites that take longer than 13 weeks to determine (Permitted applications as of outstanding permissions as at 31<sup>st</sup> March 2019)*

2.32 89% of all housing applications permitted, as of 31<sup>st</sup> March 2019, are classed as small with less than 10 units. Of the applications that took longer than 13 weeks to determine, 78% were classed as small. The size/number of units on a site does not seem to have a significant impact on the amount of time taken to determine the application.



*Fig. 28 Types of sites – outstanding permissions as at 31<sup>st</sup> March 2019 (note mixed sites are part greenfield and part brownfield)*



*Fig. 29 Type of sites that take longer than 13 weeks to determine (outstanding permissions as at 31<sup>st</sup> March 2019)*

2.33 Approximately 44% of all the permitted housing applications, as of 31<sup>st</sup> March 2019, are located on previously developed sites. 41% of the applications that took longer than 13 weeks to determine are located on previously developed sites. This nominal difference would suggest that the type of site (previously developed or greenfield) is not the determining factor in time taken to determine an application.



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

2.34 The following graph shows the number of housing developments completed in East Suffolk within the last five years relative to the length of time, in days, it took from planning consent being granted to the construction of dwellings starting on site.

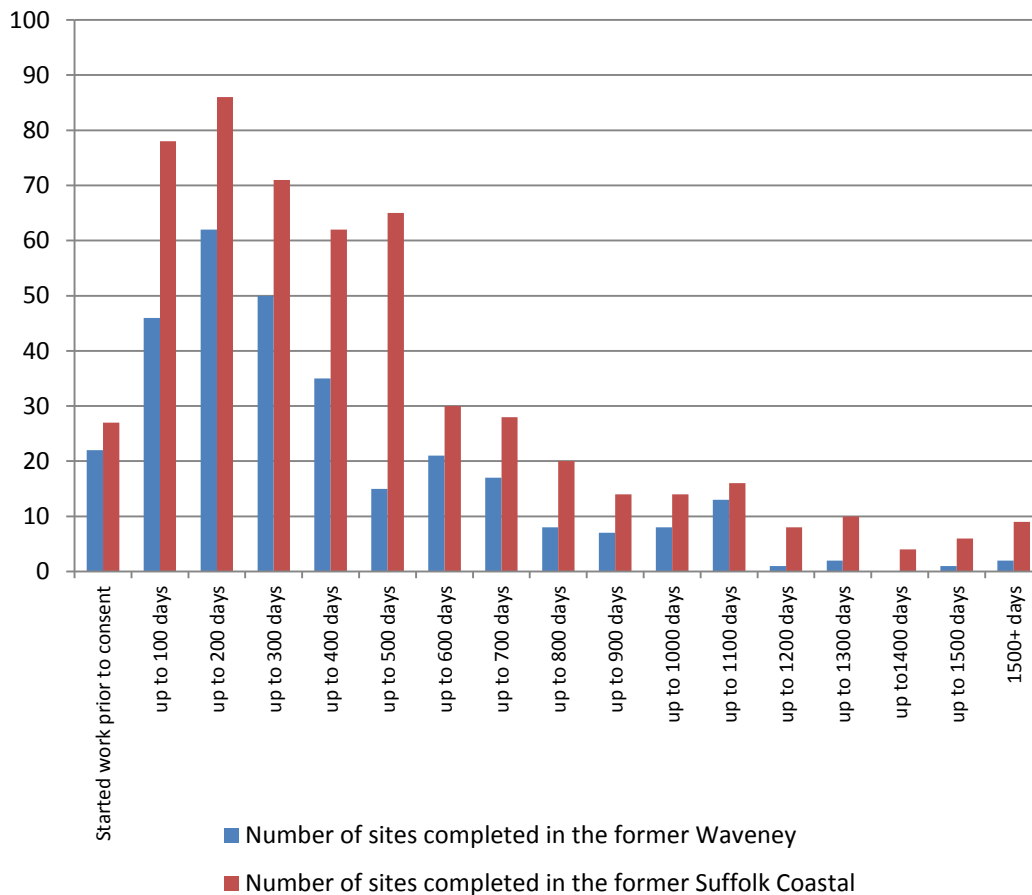


Fig.30 The length of time from consent to work starting on site for housing developments completed in the last 5 years

2.35 The graph shows largely positive results that do not cause serious concern or warrant detailed investigation. In the former Suffolk Coastal area 548 housing developments produced completed houses and in the former Waveney area 310 housing developments produced completed houses in the last five years. These housing developments either received full planning consent, had reserved matters approved, permission for change of use, were issued a prior notification or received a certificate of lawful development. 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.

- 2.36 Excessive lengths of time could possibly have indicated 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.
- 2.37 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.
- 2.38 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.
- 2.39 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.
- 2.40 Approximately 50% of all housing developments completed in the last five years in East Suffolk started work on site within 280 days of planning consent being issued. Over 90% of the housing developments that started on site within 280 days were classed as small with less than 10 units. This does not appear to be an unduly long period of time given the amount of work necessary to progress a development to this stage.
- 2.41 There were 6 applications relating to development on sites of 500 or more units which delivered completed houses in the last five years. These sites often come forward as phased developments with separate applications and start dates for each new phase. The length of time from planning consent to work starting on site varied from 151 to 1307 days. There are too few applications to consider an average time.
- 2.42 There were 12 applications relating to large sites of 50-499 units which delivered completed houses in the last five years. The length of time from full planning consent to work starting on site varied from 65 to 1231 days. There are too few applications to consider an average time.

- 2.43 There were 53 applications relating to medium sites of 10-49 units which delivered completed houses in the last five years. The length of time from full planning consent to work starting on site varied from 23 to 1431 days with an average of 435 days.
- 2.44 There were 781 applications relating to small sites of 1-9 units which delivered completed houses in the last five years. 42 of these received the final, full planning consent after starting work on site. The remaining sites took 0 to 12,313 days to start work on site. (The figure of 12,313 days relates to a completed house with a historic permission granted in 1980.) Of those applications that started work on site within three years of planning consent, the average length of time was 367 days.
- 2.45 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 a small amount of 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.
- 2.46 Where data has shown work starting on site after 3 years (1095+ days) it refers to the 'serious' start with intent to complete. These include two houses granted planning permission in 1980 and 5 houses built following planning consent granted in 2005 and a Certificate of Lawfulness confirming commencement of development within the required time issued in 2014.
- 2.47 The vast majority of houses completed within the last five years were started well within the 3 year time frame from consent being issued. In Suffolk Coastal 5.8% and in Waveney 2.4% 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 'small' (10 or less units) in size.

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

- 32 sites (out of a total of 490) = 5.8%
- Size = 32 small
- 14 greenfield, 18 brownfield

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

- 7 sites (out of a total of 291) = 2.4%
- Size = 7 small
- 2 greenfield, 5 brownfield

- 2.48 The type of housing developments completed in East Suffolk in the last five years that took more than three years (1095+ days) to start work on site;

- Net gain of 0 dwellings (5 of 39) 13%
- Net gain of 1 dwelling (23 of 39) 59%
- Net gain of 2 dwellings (4 of 39) 10%

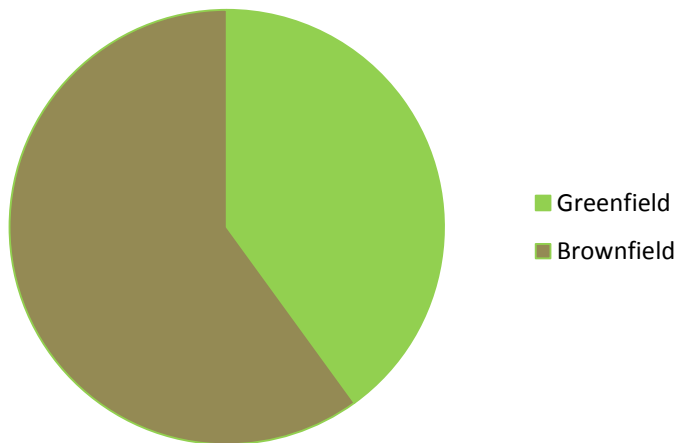
2.49 The developments include instances where houses are being replaced with a net gain of zero dwellings, and developments of 1 or 2 dwellings. These are likely to be self build developments and the delay starting on site could reflect the challenges facing self builders such as securing finance and 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.

2.50 Taking more than 3 years or 1,095 days to start seriously building on site is reasonably regarded as slow delivery. There are only 39 sites providing a total net gain of 58 permitted dwellings in the last five years that are classed as slow delivery. Across the whole of East Suffolk this represents approximately 5% of sites and less than 6% of the total net gain from developments.

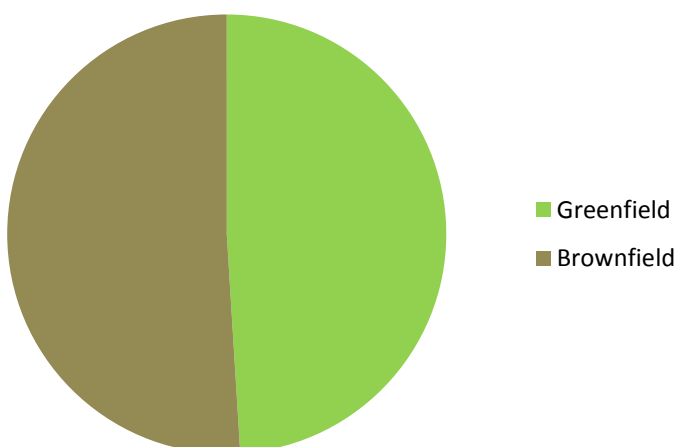
2.51 The statistical information available regarding the time taken to start building dwellings with planning consent does not indicate any district wide issues. There is no evidence that the time between planning consent being issued and work starting is especially long and that action is necessary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

## Analysis of Lapsed Consents for Housing Developments

- 2.52 In the last five years 102 planning applications in the former Suffolk Coastal area and 75 planning permissions in the former Waveney area for housing lapsed (i.e. development has not commenced before the permission has expired). This resulted in a total loss of 487 unbuilt dwellings in the former Suffolk Coastal area and 114 unbuilt dwellings in the former Waveney area. However, the Council acknowledges that some permissions will lapse and considers each permission individually through its housing land supply assessment to identify those which will potentially lapse.
- 2.53 The following charts show the type of planning permissions that have lapsed. Permissions are almost evenly split between those located on greenfield and brownfield sites.



*Fig. 31 The type of lapsed housing permissions in the former Waveney area in the last five years*



*Fig. 32 The type of lapsed housing permissions in the former Suffolk Coastal area in the last five years*

2.54 The following charts show that the majority of lapsed permissions were for developments of 1 or 2 dwellings. The chart shows the number of planning applications for housing that have lapsed by the number dwellings that would have been gained or lost if the permission had been implemented.

2.55 A permission that results in a net loss of a single dwelling is generally due to combining two properties together to form one larger dwelling. A permission that results in zero housing gain is generally due to the replacement of a dwelling. Permissions for 1 or 2 dwellings would indicate self-build schemes, building conversions, infill developments and/or very small developers.

2.56 There are exceptionally few lapsed permissions for more than 2 dwellings. A single lapsed permission for 300 dwellings in the former Suffolk Coastal area (at Trinity Park) contributed significantly to the overall total. The permission was an outline planning permission for enabling development and the landowner subsequently changed their plans which is rare and unique to the set of circumstances surrounding the consent and site. Both statistically and in planning terms this is an anomaly rather than the norm.

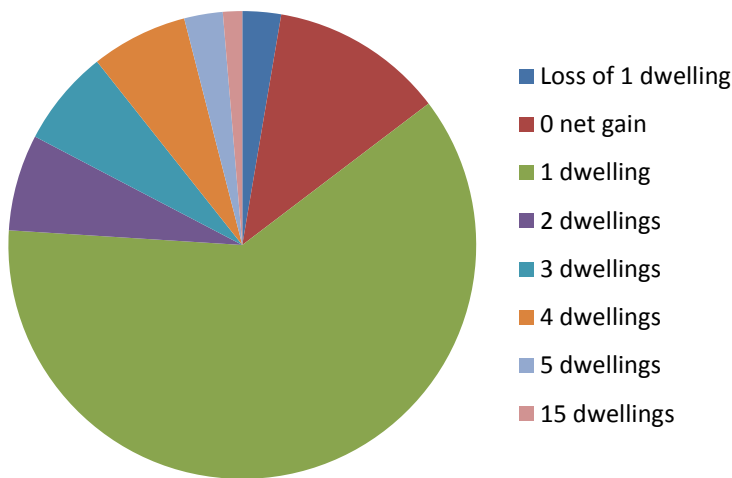
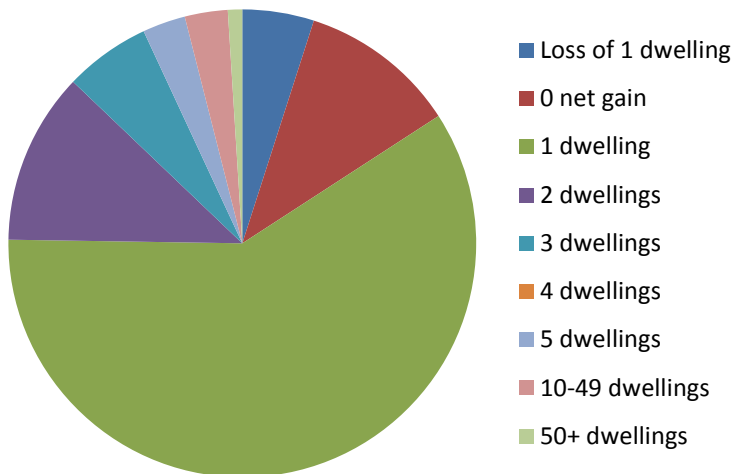


Fig. 33 The size of lapsed permissions in the former Waveney area in the last five years



*Fig. 34 The size of lapsed permissions in the former Suffolk Coastal area in the last five years*

2.57 There is no link between the type of application or the location of the application and the lapsed rates. The number of lapsed planning applications for housing is higher in areas which receive a higher number of applications. Lowestoft and Felixstowe are the largest towns in East Suffolk with the highest number of planning permissions and highest numbers of lapsed permissions. 33 or 44% of the total lapsed permissions in the former Waveney area were located in Lowestoft. 20 or 19% of the lapsed permissions in the former Suffolk Coastal area were located in Felixstowe. The Council actively monitors lapsed or likely to lapse consents when undertaking its annual Housing Land Supply Assessment.

## Impact of new Infrastructure on housing delivery

- 2.58 There are two specific infrastructure projects in East Suffolk that are likely to directly impact the delivery of housing in the short term.
- 2.59 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

- 2.60 Lowestoft town is the largest 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 Bridge to the west in neighbouring Oulton Broad. Traffic congestion is considered to restrict the towns economic and housing growth.
- 2.61 The need for a new third road crossing over Lake Lothing has long been acknowledged locally. The third crossing was debated in Parliament and received political support in 2015 from the then Prime Minister.<sup>54</sup> The project to deliver a third bridge is in the final planning stages. The public examination completed in June 2019 and the Planning Inspector is due to submit a report and recommendation to the Secretary of State by September 2019. The bridge is due to be completed and opened in 2022.<sup>55</sup> The new bridge will connect 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. 35 Lake Lothing Third Crossing timeline. Suffolk County Council Website June 2019<sup>56</sup>.

<sup>54</sup> <https://www.waveneyconservatives.org.uk/news/prime-minister-pledges-build-third-crossing-lowestoft>

<sup>55</sup> Community Newsletter Spring 2019. <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/LakeLothingThirdCrossing-Spring19.v6.pdf>

<sup>56</sup> <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/lake-lothing-3rd-crossing/>



- 2.62 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 into the Kirkley Waterfront and Sustainable Urban Neighbourhood (allocated site WLP2.4). Specifically 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.
- 2.63 On the site specific level, a small number of responses to the 2019 Housing Land supply questionnaire identified infrastructure provision as a barrier, or delaying factor, in housing delivery. In particular the provision of necessary drainage and highways infrastructure at the site specific level.

### New flood Defences in Lowestoft

- 2.64 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.<sup>57</sup>
- 2.65 The Lowestoft Flood Risk Management Project is developing 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.<sup>58</sup> 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. Key flood protection measures, such as a tidal flood lock gate, are expected to be completed by 2023.<sup>59</sup>

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<sup>57</sup> <http://www.lowestoftfrmp.org.uk/media/1197/2018-lfrmp-newsletter-i3.pdf>

<sup>58</sup> <http://www.lowestoftfrmp.org.uk/what-is-involved/tidal-flooding/>

<sup>59</sup> <http://www.lowestoftfrmp.org.uk/latest-news/ground-investigation-works/>

## A Review of the East Suffolk Planning Service

- 2.66 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 the housing delivery during the plan periods.
- 2.67 The 2019 Housing Land Supply questionnaire asked applicants and developers of sites with planning permission or which are allocated whether there is anything that the Council can do to assist in the delivery of development. Of the respondents, over half did not identify that there was anything that the Council could do in order to assist in the delivery of sites. Of those who did, the responses were largely related to the timeliness of determining planning applications and finalising Section 106 agreements, and the provision of pre-application advice. These are covered below.

### Pre-application service

- 2.68 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.
- 2.69 Present issues in relation to the operation of the pre-application advice service include the lack of a specific option for the applicant to request a site visit or meeting when submitting a request for pre-application advice (although this does take place where appropriate), and the lack of take up of the pre-application service from those submitting applications for very small sites. The Council intends to review its pre-application advice service to identify ways in which the service could result in more take up and provide additional elements.
- 2.70 The Council provides information about the pre-application service on its website, however intends to review this to make the process more user friendly and to promote it more widely to those considering submitting a planning application.
- 2.71 For major or complex sites the Council actively encourages applicants to enter into a Planning Performance Agreement (PPA) as part of the pre-application process. These enables clear terms and a level of service to be agreed. It can also cover the application

process allowing specific timeframes for the determination to be agreed, providing better certainty to applicants and allowing the Council to effectively plan and resource the process. Previously PPAs have also included the County Council as a signatory enabling a joined up approach between the LPA, applicant and statutory consultees. PPAs are also beneficial in setting agreement over the requirements of supporting/validation documents, minimising the delays caused by requests and amendments within the determination period. The Council is in the process of preparing a template PPA for its major sites.

### Quality of planning applications

- 2.72 The Council has identified an issue in relation to the varied quality of applications submitted. This can result in delays at the validation stage where the Council needs to request alternative or additional material.
- 2.73 The Council has previously published a Local Validation List and guidance and acknowledges that issues around validation requirements are often raised through the Developer Forum. The Local Validation List is in the process of being updated and is due to be published this year.
- 2.74 The Council is also considering introducing an Accredited Agents Scheme by which regular agents are able to commit to submitting applications to a particular standard in return for a more efficient validation process.

### Speed of determination

- 2.75 The Council is currently meeting Government targets in relation to the speed of determination. Figures have been lower at times when the Planning Service was not fully staffed however have recently improved. The Council will seek to ensure that vacant posts are filled in a timely manner, however recruitment of planning officers is identified as an issue in the area.

### Planning Conditions

- 2.76 The Council, having been created from the former Suffolk Coastal and Waveney districts in April 2019, currently operates two separate sets of model conditions. This can create uncertainty for regular developers and agents in relation to how to address conditions. The Council is reviewing this to produce one set of model conditions. The Council recognises that this is particularly important given the need to now agree pre-commencement conditions with applicants. Through the responses to the Housing Land Supply questionnaire, the issue of conditions was raised by a small number of respondents, including that conditions have

been difficult to achieve. However, this needs to be considered in the context of the Council providing applicants with an opportunity to review and agree the conditions, which applicants are not always taking up.

## Section 106 agreements

- 2.77 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 a 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. The speed of drafting is aided considerably when applicants submit a draft heads of terms with their planning application and where negotiation, particularly in respect of affordable housing provision and education contributions commence at pre-application stage. For major applications with a wide range of S106 obligations it has proven very efficient to arrange early and regular meetings and/or conference calls including all parties and their legal representatives to progress drafting in person. However, the stage at which negotiations and drafting begins is dependent on the preference of the developer, and the Council can begin work as soon as a legal undertaking has been received from a developer.
- 2.78 The benefit of starting the S106 agreement process early is that it reduces the need for agreed time extensions to planning applications. It is recognised that consultation responses, particularly those from the County Council have a significant influence on Section 106 agreements and where viability may be an issue the negotiated design and requirements of a site need to take place to inform S106 negotiations. There is also a risk for developers in starting early when an application may be refused planning permission, however S106 agreements should still continue to be negotiated and signed within any appeal.
- 2.79 The Council generally does not refuse planning permission where the only outstanding issue is agreeing a S106 agreement, unless it is evident that that a developer is unlikely to be in a position to reach a satisfactory agreement within a reasonable amount of time. Where possible and where a proposal is likely to receive officer support, the Council will seek an extension of time for negotiations. The Council has previously shown concern that prolonged S106 negotiations can be used to delay the issuing consent and the implementation of conditions. The Council has made recommendations for approval to Planning Committees which are subject to a S106 being signed within a specific period.
- 2.80 Anecdotally there is a perception that all the delays are due to slow responses from the Council and that blaming the Council is a 'knee-jerk response'. Recent attempts to chase the Council for information have found that the Council has previously provided the requested

information to the applicant's solicitors or is awaiting information from the applicant's solicitors.

- 2.81 The Major Sites and Infrastructure team has been established this year, in part to better manage the S106 process and this includes the recruiting new staff. The team now has three S106 and CIL Officers one Support Officer and an Infrastructure Delivery Manager. This will increase the increase the speed and efficiency of responses. 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.
- 2.82 Recently for smaller sites, in order to avoid the need for S106 agreements, the Council has created a template Unilateral Undertaking to secure Recreational Avoidance Mitigation contributions from housing developments. This significantly reduced the time that applicants and the Council have had to apply to the securing this obligation and in many cases has avoided the need for an extension of time to applications. The Council is in the process of producing other template S106 agreements to reduce the excessive time spent drafting bespoke agreements for each application.

### Recruitment and Resources

- 2.83 Up until relatively recently, a number of appeals had been taking up a relatively large amount of officer time. As there is a positive five year supply position, as established in the Statement of Housing Land Supply published in August 2019, the Council anticipates that it can focus its resources on implementing the new Local Plans.
- 2.84 It is 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. The Council has invested its increased planning fees, as provided by Government to appoint additional staff, to support the delivery of a more efficient planning service. The Councils in Suffolk were involved in the establishment of a Level 3 Technical Planning apprenticeships scheme, and for East Suffolk this saw the recruitment of two apprentices. That two year programme has finished and a new cohort across Suffolk has been appointed and East Suffolk will have a further two apprentices. The Council's Head of Planning was the national employer lead in developing a degree apprenticeship in Town Planning with the RTPi. This has also created two Trainee Planner posts, which have enabled apprentices to progress and to continue with their planning education whilst working. The Council employs and supports a number of staff who are currently involved in planning training such as undertaking Masters courses. In order that planning as a career is promoted at an early stage in education, officers are also visiting secondary schools to promote planning amongst pupils. The Council also supports those in specialist roles in undertaking appropriate courses, for example in relation to design and

conservation. The investment in staff has resulted in an increase of c£300k to the salary budget and resulted in 10 additional roles (including the new apprentices).

- 2.85 East Suffolk includes a high number of nature conservation designations of local, national, and international importance. These sites include Special Protection Areas and Special Areas of Conservation designated to protect birds, other wildlife and their habitats. Many of these sites are located along the coast and cover areas of wetland. Previously the Council was dependant on Natural England to provide consultation advice and this at times caused delays in the decision making process. To address this, East Suffolk appointed two Ecologists in 2019 to provide dedicated support and advice in house.
- 2.86 Recently the Council has established a new Major Sites and Infrastructure Team, which has allowed the recruitment of five new positions to work proactively in delivering housing growth and investment in infrastructure. This includes Major Sites Planning Officers and an Infrastructure Delivery Manager. 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.
- 2.87 The Council has learnt a great deal in recent years from the process it went through in determining the Brightwell Lakes (Land to the South and East of Adastral Park) outline planning application. This complex 2,000 homes proposal had a highly contentious history and the Council invested in dedicated officer resources to manage the planning application process and to work very closely with consultees and the County Council with a single team approach, alongside community engagement. This enabled a challenging strategic scale development with major infrastructure proposals, to progress to determination with a signed S106 within 1 year. This approach is being applied to other Major Sites through the new team to enable swifter decision making whilst also achieving high quality outcomes. In the case of Brightwell Lakes, the collaborative approach taken with the applicants in processing the application and masterplanning has received national recognition as the proposal was successful in being recognised in the following awards as joint submissions:
- 2018 East of England RTPI Awards for Planning Excellence – Winner
  - 2019 RTPI National Awards for Planning Excellence in Plan Making – Finalist
  - 2019 Planning Awards – Best National Scheme for over 500 Homes - Winner

## Attracting housebuilders to East Suffolk

- 2.88 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.
- 2.89 For the past 10-15 years Persimmon Homes has been the only National volume housebuilder operating in the former Waveney area, working on the Woods Meadow site in north Lowestoft. The nearest offices of a volume housebuilder are Persimmon Homes' offices in Norwich and Great Blakenham. Lowestoft in particular attracts a very small group of housebuilders including Badger Builders, Cripps Builders, Persimmon Homes, Hopkins Homes and Oldman Homes.
- 2.90 In the former Suffolk Coastal area, Persimmon Homes, Bloor Homes and Taylor Wimpey represent the dominant national housebuilders operating in the area. Regional developer Hopkins Homes are also a prominent developer, with offices in Melton, and have developed numerous sites.
- 2.91 The size and number of sites allocated in the emerging and new Local Plans are appropriate for the character of the area, to meet the local housing need and to provide a diverse range of sites. The Council acknowledges that national housebuilders will focus on developing the larger sites. On the largest sites, such as Brightwell Lakes, the Council expects a master developer to deliver key infrastructure and serviced parcels to multiple housebuilders. This diversity of housebuilders and the type of housing on offer is recognised in enabling faster build out rates.
- 2.92 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. However, attempts to attract a greater number and variety of housebuilders to Lowestoft or the wider former Waveney area through invites to developer forums have not been successful. The Council will continue to invite a range of housebuilders to bi-annual Developer Forums in order to build confidence that East Suffolk presents and strong opportunity to deliver new homes with a proactive planning service.
- 2.93 Future development briefs for allocated sites offer the opportunity to sell the opportunities and benefits of developing housing in East Suffolk and provide housebuilders with greater certainty regarding what is possible.

# 3 Key Actions & Responses

## Delivering Planned Growth

- 3.1 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 needs to be a monitoring document to keep on top of any potential delivery challenges that may come up, and ensure the adopted housing trajectory is met.
- 3.2 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.
- 3.3 Issues beyond the scope of the Local Plan could include;
- 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.
  - The efficiency of the planning system.
  - 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.

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

3.5 The Council has recently established a Major Sites and Infrastructure Team, and is currently recruiting to fill the posts created. The purpose of the Major Sites and Infrastructure Team is to provide a targeted approach to the delivery of sites which are either large or are more complex in some way. The team will liaise with relevant parties, including the developers and applicants as well as infrastructure providers and local communities, following the approach undertaken successfully in relation to Brightwell Lakes as described in section 1.5 above. This approach will enable a tailored approach to support the delivery of each site, which may include agreeing Planning Performance Agreements around the process and funding relating to the submission and consideration of planning applications, or the submission of bids for funding for specific elements, such as key infrastructure, to support the delivery of the development. The Council is also involved in a recently established major sites group which is a regular meeting of officers across Suffolk with responsibility for bringing forward major sites, supported through the Suffolk Growth Programme Board.

## Actions

- 3.6 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 of this Housing Action Plan. 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.
- 3.7 The actions detailed below focus on procedural improvements, policy implementation, monitoring and delivery, and the Planning service's resources.

Action (outcome to be achieved)	Success	Timescale	Priority	Status	Service/ owner	Notes
<b>Procedural</b>						
Review and consult on a new pre-application advice service (Possible developer survey or consultation - yet to be decided)	Increased up take up of pre-application advice service	2019/20	Low	Not started	Development Management	
Publish template PPAs for major sites	Swifter negotiation of PPAs and increased sign up leading to swifter decision making	Spring 2020	Low	Not started	Major Sites and Infrastructure Team	
Introduce an Accredited Agents Scheme	Faster validation service	2019/20	Low	Not started	Development Management	
Publish an updated Local Validation List	Decreased invalid applications and decreased requests for information within applications enabling swifter decision making	2019/20	High	Underway	Development Management	
Introduce one set of model conditions	Consistent quality of service across the former Waveney and Suffolk Coastal areas	2019/20	Low	Underway	Development Management	
Develop S106 templates with standard wording for different standard scenarios that would be published on the website	Reduction in the length of delays	2019/20	Medium	Underway	Major Sites and Infrastructure Team	
<b>Policy Implementation</b>						
Adoption of up to date Suffolk Coastal Local Plan	Planned approach to growth, which can be supported by the other actions identified above	Early 2020	High	Underway	Planning Policy and Delivery	Suffolk Coastal Local Plan is currently being Examined with examination hearings taking place in August/September 2019.
Establishment of Major Sites and Infrastructure Team	Planning Service able to bring together factors involved in delivery of sites	2019/20	High	Underway	Planning Policy and Delivery	
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	Medium	Not started	Planning Policy and Delivery (Major Sites and Infrastructure)	

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	Planning Policy and Delivery	
<b>Monitoring and Delivery</b>						
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	Planning Policy and Delivery	
<b>Resources</b>						
Re-advertise posts	Fill vacant posts in Major Sites and Infrastructure Team	2019	High	Underway	Planning Policy and Delivery (Major Sites and Infrastructure)	


# 4 Delivery and monitoring of the Housing Action Plan

- 4.1 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.

## Future Housing Actions Plans and Housing Delivery Tests

- 4.2 Issues identified with the previous spatial strategies and site allocations, which were exacerbated by brownfield site challenges and the recession, are being addressed through new Local Plans. The new Waveney Local Plan and the emerging Suffolk Coastal Local Plan represent the main planning strategies to bring forward housing delivery in East Suffolk.
- 4.3 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.
- 4.4 The two Local Plans contain realistic housing trajectories which reflect the time necessary for the new housing strategies to impact building completions. 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, 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.
- 4.5 The first Housing Delivery Test was published in February 2019 and is due to be published on an annual basis. The publication of the Housing Action Plan in August 2019 will not impact the number of completions in East Suffolk before the publication of the next Housing Delivery Test results, which are anticipated in November 2019. 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 increase in annual house completions improving the overall Housing Delivery Test result. It is therefore necessary to have realistic expectations of incremental change.

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