

Housing Action Plan

Identifying actions to support the delivery of new housing

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Summary

- i. East Suffolk Council first produced a Housing Action Plan in 2019 and produced an update in 2020. This third Housing Action Plan for East Suffolk reports on progress and delivery made over the past year on actions identified in the previous two Housing Action Plans and identifies new challenges that have arisen.
- ii. The Housing Delivery Test was introduced by the Government in 2018 and assesses how successful each Local Authority has been at supplying the required number of houses in the previous three financial years. In Local Planning Authority areas where less than 95% of the required housing has been delivered over the past three years, authorities must produce a Housing Action Plan. In those areas where less than 85% of the requirement was delivered there is an additional requirement to apply a 20% buffer in calculating 5-year land supply, and where less than 75% is delivered the 'presumption in favour of sustainable development' would also apply in decision making. The Government intends to publish the results of the Housing Delivery Test in November each year (for the past three full financial years) and transitional arrangements mean that the requirements outlined above were phased in over the period up to November 2020. The transitional arrangement, which was initially set out in Annex 1 of the now-superseded 2019 National Planning Policy Framework and has been carried forward in the 2021 NPPF, is the 'presumption in favour of sustainable development' being applied to 2018 Housing Delivery Test results below 25% and 2019 Housing Delivery Test results below 45%. A 'presumption in favour of sustainable development' is applied to Housing Delivery Test result below 75% from 2020 onwards. The purpose of a Housing Action Plan, as set out in paragraph 76 of the National Planning Policy Framework, is to assess the causes of under-delivery and identify actions to increase delivery in future years.
- iii. The first set of Housing Delivery Test results, covering the period 2015/16-2017/18, were published in February 2019 and relate to the areas covered by the Council's Local Plans: the result for the former Suffolk Coastal area was 128% and the result for the former Waveney area was 72%. The Housing Delivery Test result required no action to be taken by the former Suffolk Coastal area and the former Waveney area to produce a Housing Action Plan and apply a 20% buffer when calculating the 5-year land supply.
- iv. The second set of Housing Delivery Test results, covering the period 2016/17-2018/19, were published in February 2020 and also relate to the areas covered by the Local Plans: the result for the former Suffolk Coastal area was 127% and the result for the former Waveney area was 89%. The Housing Delivery Test result required no action to be taken by the former Suffolk Coastal area and the former Waveney to produce a Housing Action Plan. The improvement in the result to 89% brought the former Waveney area out of the requirement to apply a 20% buffer when calculating the 5-year land supply (a 5% buffer is to be applied instead).

- v. The third Housing Delivery Test result, covering the period 2017/18 – 2019/20, was published in January 2021 and relates to East Suffolk (not the former Suffolk Coastal and Waveney Districts separately). The result for East Suffolk is 109% and is the first time the area has been assessed as a recently reorganised authority. Following the publication of 2020 Housing Delivery Test results no further action is required by East Suffolk Council.
- vi. East Suffolk Council is in a positive position in terms of setting out its planned approach to housing delivery, with the Local Plan for the former Suffolk Coastal area adopted in September 2020, and the Local Plan for the former Waveney area adopted in March 2019. The two new Local Plans set ambitious targets for housing delivery, along with site allocations and policies to bring development forward. In the former Waveney area the Local Plan has sought to address previous reasons for under delivery in the Local Plan with a range of site allocations that exceed the minimum level of housing needed by approximately 12%. In the Suffolk Coastal area delivery has exceeded requirements in recent years and the Local Plan allocates a range of new sites to seek to continue this trend.
- vii. The Council maintains a proactive approach to housing delivery with progress made on several initiatives since the publication of its first Housing Action Plan in August 2019. Significant progress has been made in several areas with the Suffolk Coastal Local Plan adopted, recruitment to the Major Sites and Infrastructure Team, and preparation and consultation on Supplementary Planning Documents and development briefs for small sites. The actions detailed in the Housing Action Plan are focused on improvements to procedures in the Planning Service, policy implementation, and monitoring of the new and emerging Local Plans and the site allocations within them. The Council has, alongside taking forward the actions in the Housing Action Plan, published a Housing Enabling Strategy which acts alongside the Housing Action Plan in guiding the Council's wider actions to support and facilitate housing delivery.
- viii. The pandemic has impacted the economy and was expected to have a detrimental impact on the construction industry and housing market. However, the housing market has been strong since the first lockdown due to changes to Stamp Duty, increased housing demand and changes in the way in which people live and work. However, there are current issues related to materials supply and cost that may impact on housing delivery. The Housing Action Plan assesses the ongoing impact of the pandemic and other issues on housing delivery in East Suffolk to ensure the Council is informed and able to take proactive steps where practically possible to help the delivery of houses to meet the ambitious targets in the two Local Plans. The 2021 Housing Delivery Test result will include the period most affected by the Covid-19 pandemic (2020/21) as some construction sites temporarily closed and others were delivering housing at a slower than previously expected rate.
- ix. Whilst some sites in the new Local Plans are expected to come forward in the short term, others will take longer to deliver, and the Housing Action Plan will not have an immediate influence on the Housing Delivery Test results.

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

1 Introduction

Background

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

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

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

- 1.5 The above plans sit alongside the Council's existing Housing Strategy which seeks over the six year period (2017-2023) to increase the amount of Council owned affordable housing to more than 5,100 homes, increase the overall number of affordable homes in East Suffolk by 250 units per annum, and intervene to deliver the Kirkley Waterfront and Sustainable Urban Neighbour development³.
- 1.6 The Local Plan for the former Waveney area⁴ (excluding the area covered by the Broads Authority) was adopted in March 2019 and a new Local Plan for the former Suffolk Coastal area⁵ was adopted in September 2020. The new Local Plans contain site allocations and policies to deliver, and exceed, the new housing needed.
- 1.7 The Council's ambition emulates 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 or local housing need calculated under the national standard methodology and calculates this as a percentage figure, as set out in the Housing Delivery Test Measurement Rule Book⁶. The Government intends to publish the results in November each year. The results of the Housing Delivery Test are applied as follows:
- the publication of an action plan if housing delivery falls below 95%;
 - a 20% buffer on a local planning authority's 5-year land supply if housing delivery falls below 85%; and
 - the presumption in favour of sustainable development if housing delivery falls below 75%, once transitional arrangements have ended⁷.
- 1.8 Where a housing action plan is to be produced, paragraph 76 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

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

⁴ www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf

⁵ www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf

⁷ A transitional period was initially set out Annex 1 of the 2019 NPPF (carried forward in the 2021 NPPF) under which the presumption in favour of sustainable development was to apply where the Housing Delivery Test results published in November 2018 indicate that delivery was below 25%, the Housing Delivery Test results published in November 2019 indicate that delivery was below 45% and the Housing Delivery Test results published in November 2020 and subsequent years indicate that delivery was below 75% (note that the 2018 and 2019 results were published in the following February and the 2020 result was published in the following January).

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.⁸

- 1.9 The third Housing Delivery Test result (the 2020 measurement) was published in January 2021⁹. The method for calculating the Housing Delivery Test result for the 2019/20 monitoring year was amended by the Ministry of Housing, Communities and Local Government (MHCLG) to reflect the impact the pandemic and the initial lockdown had on the construction industry in March 2020. “For the 2020 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a three-year period but an 11-month period has been used for the 2019/20 monitoring year. This is to account for disruption to housing delivery and monitoring caused by restrictions announced on 23 March 2020, in response to the COVID-19 pandemic.”¹⁰
- 1.10 The former Suffolk Coastal and Waveney areas were previously assessed separately. Following the publication of the 2018 Housing Delivery Test result, the former Waveney area was required to produce a Housing Action Plan and apply a 20% buffer to the housing requirement for the purpose of assessing the Housing Land Supply. Following the publication of the 2019 Housing Action Plan the former Waveney area was required to publish a Housing Action Plan. East Suffolk Council has chosen to publish a Housing Action Plan annually for the whole district. The Housing Delivery Test results from 2018, 2019 and 2020 were as follows:

LPA	Number of homes required ¹¹				Number of homes delivered ¹²				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%

Figure 1 2018 Housing Delivery Test results (published February 2019)

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

⁹ www.gov.uk/government/publications/housing-delivery-test-2020-measurement

¹⁰

assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953304/2020_HDT_technical_note.pdf

¹¹ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

¹² 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.

LPA	Number of homes required ¹³				Number of homes delivered ¹⁴				HDT result
	2016-17	2017-18	2018-19	Total	2016-17	2017-18	2018-19	Total	
Suffolk Coastal	465	392	502	1,359	550	582	588	1,720	127%
Waveney	313	299	370	983	243	295	335	873	89%

Figure 2 2019 Housing Delivery Test results (published February 2020)

1.11 The following results were published for East Suffolk in January 2021:

LPA	Number of homes required ¹⁵				Number of homes delivered ¹⁶				HDT result
	2017-18	2018-19	2019-20	Total	2017-18	2018-19	2019-20	Total	
East Suffolk	691	886	833	2,410	877	923	832	2,632	109%

Figure 3 2020 Housing Delivery Test results published January 2021

- 1.12 There is no requirement under the NPPF to produce a Housing Action Plan, where the Housing Delivery Test has identified that delivery has been above 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.’¹⁷
- 1.13 The 2019 and 2020 Housing Action Plans were produced because the former Waveney area failed to achieve a Housing Delivery Test result of 95% or more. The former Suffolk Coastal area has consistently achieved over 100% in the Housing Delivery Test. The 2019 and 2020 Housing Action Plans took the approach that as the two areas relate to the district of East Suffolk, in view of the corporate objectives surrounding housing delivery and to ensure that the strong recent record of delivery is maintained in the former Suffolk Coastal area, the housing action plan would cover the full East Suffolk local planning authority area (note this is excluding the Broads Authority area).
- 1.14 The former Waveney area has for the past few years consistently delivered below the housing requirement in the Waveney Local Plan and the Housing Delivery Test requirement. In view of these results, it is considered particularly important to monitor housing delivery in the former Waveney area, assess the reasons and where appropriate take action.

¹³ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

¹⁴ Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test: 2019 Measurement Technical Note published alongside the results https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865156/HDT_Technical_Note_2019.pdf

¹⁵ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

¹⁶ Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test: 2019 Measurement Technical Note published alongside the results https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865156/HDT_Technical_Note_2019.pdf

¹⁷ Planning Practice Guidance Paragraph: 048 Reference ID: 68-048-20190722 Revision date: 22 July 20109

Purpose and scope of this action plan

1.15 This document represents the Council's Housing Action Plan as per paragraph 76 of the NPPF. As set out in paragraph 1.11 above, the Council achieved a 109% Housing Delivery Test result in 2020 and is therefore not required to produce an action plan but nevertheless considers it good practice to monitor and review its actions on housing delivery and to report on this on an annual basis. The production of this update has focused on considering whether the causes of under delivery identified in the previous Housing Action Plans are still valid, reporting on progress made against actions identified in the 2020 Housing Action Plan, identifying whether there are potential new/future causes of under delivery of housing (albeit the Housing Delivery Test has been passed), how any issues identified relate to planned growth and identifying actions to address these issues. The housing requirements for East Suffolk are set out below:

- Former Suffolk Coastal area: 542 dwellings per year, as set out in the Suffolk Coastal Local Plan (2020).
- Former Waveney area: 374 dwellings per year, as set out in the Waveney Local Plan (2019).

1.16 The Housing Action Plan plays an important role in identifying actions to help to deliver these requirements. Alongside this, it is important to acknowledge that in addition to delivering this quantity of housing, Local Plan policies also reflect the needs for a mix of housing, the provision of affordable housing and for housing to be well designed and sustainably constructed, and it is essential that these objectives are also delivered. To support the Local Plan design policies the Council has annual awards for high quality design¹⁸.

1.17 The East Suffolk Housing Strategy 2017-23 sets out the Council's approach to addressing housing needs, particularly the need for affordable housing. The five areas of focus include 'increasing the supply of new housing to meet a range of needs – a more proactive role for East Suffolk supporting the development of affordable homes'.

1.18 The Housing Action Plan sits alongside the Council's Housing Enabling Strategy (2020-2025) and Housing Development Strategy (2020-2024). The Housing Enabling Strategy was produced jointly by the Housing and Planning services, with input from other areas of the Council, and sets out the corporate approach to increasing housing delivery, setting out a

¹⁸ www.eastsuffolk.gov.uk/planning/design-and-conservation/quality-of-place-awards/2021-quality-of-place-awards/

range of actions including the use of the Council's assets to meet the aims of the housing strategies, engaging with a wider range of developers, supporting community led housing and the role of the Council in the delivery of rural exception sites.

- 1.19 The Council is working closely with Registered Providers, Town and Parish Councils and Community Groups to raise awareness of the Housing Enabling Strategy and the support available from the Council (see Section 3), and to encourage community led housing projects. The Council's Housing Strategy and Enabling service has held various events over the past 12 months; Forums for Registered Providers were held in December 2020 and June 2021, a seminar was held for community groups and there have been numerous meetings with Town and Parish Councils. Further meetings and seminars are planned throughout 2021 and 2022. A dedicated seminar for self-build and custom build applicants is planned in autumn 2021. The seminar aims to support the growth of self-build and custom build homes and diversify the housing market.
- 1.20 The Council, led by its Housing Strategy and Enabling service, is developing an older person's housing strategy which is designed to promote and encourage housing for retired aged people across all tenures. Work on the strategy is exploring the mix of flats and bungalows and the level of care services required to promote independent living for all tenure types. Work on the strategy is evolving but it should help ensure that the right homes, available for all tenures are delivered. The older person's strategy is due to be published in Summer 2022.
- 1.21 The Housing Development Strategy details the Council's commitment and approach to building and acquiring properties and land in East Suffolk. The Council is now playing an active role in acquiring and developing sites for housing. The actions include a commitment to review corporately all Council owned land to identify potential development sites for new Council housing and to develop a three year rolling development programme to achieve 50+ units per annum.
- 1.22 This Housing Action Plan therefore focuses on actions that are specific to planning, however identifies linkages with wider corporate objectives and actions where relevant.
- 1.23 The Council separately publishes a [Housing Land Supply Statement](#) each year, to meet the requirements of paragraph 74 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 housing requirements. The Housing Land Supply Statement to identify the supply of deliverable sites for housing for the five years between 1st April 2021 and 31st March 2026 is currently being finalised.
- 1.24 Whilst the purpose of the Plan is to set out actions to maintain housing delivery, it is relevant to acknowledge that recent actions the Council has taken in the past year since the

publication of the 2020 Housing Action Plan will not be reflected in the 2020-21 housing completion figures.

The East Suffolk Area Profile

- 1.25 East Suffolk Council was officially created on 1st April 2019. The area was formerly covered by Suffolk Coastal District Council and Waveney District Council and the two Councils had been working closely together since 2008 under a shared Chief Executive.

Geography

- 1.26 The majority of East Suffolk is rural in character covering approximately 487 square miles with a coastline of 78.9km. East Suffolk has a total of 423 designated nature conservation sites which cover 47,224ha, 51 Conservation Areas¹⁹, and approximately 4,100 listed buildings²⁰. With exceptional natural, historic and built environments the district is therefore a popular destination for visitors from the UK and abroad.

Population

- 1.27 East Suffolk Council is the largest District Council in England by population with 250,373²¹ people. There are no cities in Suffolk and the largest towns in East Suffolk are, in order of population size, Lowestoft, Felixstowe and Kesgrave. There are a high proportion of older people in East Suffolk. Over 65s make up 27.7% of the total population in East Suffolk compared to 18.5%²² across England. East Suffolk together with the rest of Suffolk is projected to have an increasingly aging population in the coming years.

Housing

- 1.28 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.

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
2019	8.95	7.03	7.83
2020	9.4	7.47	7.84

Figure 4 Affordability ratios²³

¹⁹ <https://www.eastsuffolk.gov.uk/planning/design-and-conservation/conservation-areas/conservation-area-appraisals/>

²⁰ <https://www.eastsuffolk.gov.uk/planning/design-and-conservation/listed-buildings/>

²¹ www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000244

²² www.suffolkobservatory.info/population/report/view/17e45add2fd547c38a1a20bc2635673b/E07000244

²³ www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian/current

- 1.29 The Office for National Statistics data on median house prices, salaries and affordability ratios show East Suffolk is experiencing a similar housing affordability crisis to the rest of the UK, but it is particularly acute in the former Suffolk Coastal area.

	2019	2020
Suffolk Coastal	£282,500	£285,000
Waveney	£190,000	£198,727

Figure 5 Median house price by local authority district (for the 12 months ending September)

	2019	2020
Suffolk Coastal	£31,556	£30,335
Waveney	£27,027	£26,604

Figure 6 Median gross annual work-based earning by local authority district

Methodology

- 1.30 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 local planning authorities could consider.
- 1.31 The Planning Advisory Service has produced tools to assist local planning authorities in producing action plans, and the Council has referred to these for guidance. The Council has also actively participated in workshops held in 2019 and 2020 by the Planning Advisory Service to learn from others and ensure that it is developing effective action plans.
- 1.32 The methodology that East Suffolk Council has followed is summarised below. The Council has taken a proportionate approach that allows each Housing Action Plan to be read as an independent document whilst also seeking to avoid unnecessary repetition of the information provided in the previous Housing Action Plan. It is focused on developing its understanding of any historic, current and potential future issues affecting delivery.
- 1.33 The starting point for this Housing Action Plan is that the Housing Delivery Test has been passed. Therefore, the Council is starting from a positive position, and the Housing Action Plan will seek to reinforce and strengthen this.
- 1.34 The former Suffolk Coastal area has consistently exceeded the housing need requirement since 2015/16, up to 2019/20. The former Suffolk Coastal area housing requirement set out in the 2013 Core Strategy was 465 dwellings per year. The 2020 Suffolk Coastal Local Plan sets out a more ambitious requirement of 542 dwellings per year, based on the local housing need calculated under the Government's standard methodology.
- 1.35 The former Waveney area has consistently under delivered housing, failing to meet the housing requirement. The former Waveney area housing requirement set out the 2009 Core Strategy was 290 dwellings per year, and the 2019 Waveney Local Plan sets a higher requirement of 374 dwellings per year based on the objectively assessed need for housing evidenced by the Strategic Housing Market Assessment.
- 1.36 The drop in housing completions in the former Waveney area from 297 to 159 between 2018/19 and 2019/20 is a significant decrease and the reasons are unclear. The Housing Action Plan published in 2019 explores in detail past reasons for low housing delivery in the Waveney area over recent years.

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Former Suffolk Coastal area	427	565	548	582	588	660	510
Former Waveney area	136	135	264	284	297	159	201

Figure 7 Total annual housing completions

- 1.37 The Council annually publishes a Housing Land Supply Statement, setting out the number of years supply of land available for housing for each Local Plan area. Since 2019 the Council has been seeking more information on deliverability from developers, landowners and agents. In 2020 and 2021 the Council also considered it important to gain an understanding of the impacts of the Covid-19 pandemic on the development of specific sites that are allocated, have planning consent or are under construction. This information was gathered through questionnaires and analysis of responses has informed this Housing Action Plan and the Housing Land Supply Statement.
- 1.38 The methodology and approach is described below.
- 1.39 This 2021 Housing Action Plan seeks to build on the previous two Housing Action Plans and the aims set out in the Waveney Local Plan and Suffolk Coastal Local Plan:
- The Housing Action Plan explains the approach in the Waveney Local Plan to addressing past under-delivery;
 - The Housing Action Plan explains the approach in the Suffolk Coastal Local Plan to maintaining previous strong housing delivery; and
 - A summary of the issues identified in the 2020 and 2019 Housing Action Plans are provided for reference as they remain relevant and provide context to housing delivery.
- 1.40 To update and enhance the Council's understanding of the deliverability of the new Local Plans, information gathering and analysis has been undertaken:
- An update of analysis of planning processes and stages of housing delivery, revisiting the analysis in the 2020 Housing Action Plan;
 - Analysis of impacts of Covid-19 locally and nationally on housing delivery;
 - Analysis of other local, national and global issues that are impacting housing delivering; and
 - Analysis of the work being carried out by the Planning Service to support housing delivery.

1.41 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.

1.42 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; and
- Internal consultation has taken place with the Building Control, Housing, Economic Development and Regeneration, and Development Management Teams.

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

Suffolk Coastal Local Plan

- 1.44 The Suffolk Coastal Local Plan was adopted by East Suffolk Council in September 2020. The former Suffolk Coastal area has had strong housing delivery that exceeded set annual requirements between 2015/16 to 2019/20. The new Local Plan identifies a housing requirement of 9,756 homes (or 542 new homes per year) for the period 2018 – 2036, based on the Government’s standard method for calculating local housing need.
- 1.45 The 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 meet, and exceed, the requirement of 542 dwellings per year the strategy identifies sites to meet the residual need of 2,758 dwellings (i.e. those not already allocated or with permission at 31.3.18), plus provides a 16.5% contingency on top of this, and also includes policies to support an anticipated windfall delivery of 800 dwellings over the plan period. The approach is to provide a diversity of supply of sites.
- 1.46 Whilst the requirement of 542 dwellings per year was not met in the 2020/21 year (510 were completed), the monitoring year was affected by Covid-19 restrictions and based upon previous performance the Council is confident that the requirement in the Local Plan will be met in future years. As the Suffolk Coastal Local Plan was adopted in September 2020, there has so far been relatively limited time for new site allocations to translate into housing completions.

Waveney Local Plan

- 1.47 The Waveney Local Plan (March 2019) housing requirement is the objectively assessed need as calculated through the Strategic Housing Market Assessment under the 2012 NPPF. The Strategic Housing Market Assessment identified a need for 8,223 new homes over the plan period of 2014-2036 which equates to 374 homes a year. The Waveney Local Plan aims to exceed this minimum target by providing 9,235 new homes during the plan period, excluding any expected contribution from windfall development. This represents a significant increase and challenge when compared to the previous Core Strategy (2009) figure of 290.
- 1.48 The 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 Local Plan takes forward previously allocated sites where possible and feasible, and also allocates new greenfield sites for housing development. There is a reduced dependence on growth in central Lowestoft. Larger allocations include a new Garden Village to the north of Lowestoft, a mixed-use development in Carlton Colville/Gisleham to the south of Lowestoft, and a new Garden

Neighbourhood on the southern edge of Beccles/Worlingham. There is an increase in emphasis on sustainable development and growth in rural areas through site allocations in villages and new planning policies that actively support small windfall developments in rural areas. The new approach to housing delivery in the Waveney area is reflected in the 2019 and 2020 Housing Land Supply Statements which have shown a strong housing land supply of 6.58 years and 6.04 years respectively.²⁴

- 1.49 The Waveney Local Plan was adopted in March 2019 meaning that to date there is still relatively limited information available to fully assess the effectiveness of the new spatial strategy in delivering housing. However, monitoring of housing delivery will continue to be undertaken as the Plan is implemented.

²⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Monitoring-Information/Five-Year-Supply-of-Land-for-Housing/083-Statement-of-housing-land-supply-March-2019.pdf>

Neighbourhood Plans

- 1.50 East Suffolk has a total of 40 Neighbourhood Plans at various stages of development, from area designation, Regulation 14 consultation, Regulation 16 consultation to being ‘made’. As reported in the 2019 and 2020 Housing Action Plans the Council continues to support Neighbourhood Plan groups through the provision of guidance, advice and technical input as well as through meeting the Council’s statutory functions related to the production of a Neighbourhood Plan.
- 1.51 There are currently twelve Neighbourhood Plans that have been made across East Suffolk. These are for Bredfield, Framingham, Great Bealings, Kesgrave, Kessingland, Leiston, Martlesham, Melton, Mutford, Rendlesham, Reydon and Wenhaston with Mells Hamlet.
- 1.52 Referendums were held on Thursday 6th May 2021 for the Bredfield, Kesgrave and Reydon Neighbourhood Plans. All three Neighbourhood Plans received a majority of votes in favour of the Plan. The three Neighbourhood Plans were ‘made’ by East Suffolk Council on 26th May 2021 and are now part of the development plan. The Bredfield Neighbourhood Plan allocates land for 30 new dwellings across three sites.
- 1.53 The examination of the Beccles Neighbourhood Plan has recently taken place. Subject to modifications in the Examiner’s report the Beccles Neighbourhood Plan should proceed to referendum. Lound, Ashby, Herringfleet and Somerleyton Neighbourhood Plan completed the Regulation 14 consultation (first public consultation on the draft plan) on 26th February 2021, Southwold Neighbourhood Plan completed the Regulation 14 consultation on 31st January 2021 and their Regulation 16 consultation (second public consultation on the Final draft plan) ended on 9th July 2021.
- 1.54 The Council expects Lound, Ashby, Herringfleet and Somerleyton Neighbourhood Plan and Wickham Market Neighbourhood Plan will proceed to Regulation 16 consultations in 2021/22. Several Neighbourhood Plans are also expected to hold their Regulation 14 consultation in 2021/22.
- 1.55 In the former Suffolk Coastal area Neighbourhood Plans are expected to be proactive in delivering housing, as set out in the Local Plan policy SCLP12.1 Neighbourhood Plans which provides housing requirements for towns and parishes with a designated neighbourhood area at the point the Local Plan was prepared. For those without a designated area at the time the Local Plan was prepared, SCLP12.1 supports other Neighbourhood areas in planning for housing by stating “Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development.” Some ‘made’

Neighbourhood Plans, such as Bredfield, Framlingham and Leiston have already allocated 30, 105 and 390 dwellings respectively, and the Wickham Market Neighbourhood Plan which was subject to Regulation 14 consultation in 2019 is proposing site allocations.

- 1.56 The Waveney Local Plan (2019), unlike the Suffolk Coastal Local Plan, does not set out housing requirements for designated neighbourhood plan areas but Policy WLP1.1 Scale and Location of Growth states “Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy.” The former Waveney area has three ‘made’ Neighbourhood Plans, Kessingland Neighbourhood Plan, Mutford Neighbourhood Plan and Reydon Neighbourhood Plan. The Kessingland Neighbourhood Plan allocates 3 new sites with a total of 105 new dwellings, and contains housing policies to support affordable housing and residential infill and backland development. It is expected that Neighbourhood Plans will support the strategy set out in the Local Plan and will contribute positively towards the delivery of housing, which may include appropriate site allocations.
- 1.57 Paragraph 67 of the NPPF states that a local planning authority should provide an indicative housing requirement figure to a neighbourhood planning body if requested to do so. The Council, with the Broads Authority (as some Neighbourhood Plan areas cross into the Broads), has prepared a methodology for establishing a housing requirement if asked for one by a Neighbourhood Plan group. This will enable the Council to support those Neighbourhood Plan groups who are looking to plan for housing through their Neighbourhood Plans. The methodology can be viewed on the Council’s website at [Preparing a Neighbourhood Plan » East Suffolk Council](#).
- 1.58 The Council is producing Neighbourhood Plan guidance to help deliver housing through planning policies and site allocations in plans. The guidance will include information on planning for various house types including self-build and custom build houses. The primary focus will be community led housing. The guidance is due to be published late 2021.
- 1.59 The status of Neighbourhood Plans and details on how to apply for a Neighbourhood Area designation are available on the East Suffolk website at:
<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/>
Guidance on how to prepare a Neighbourhood Plan can be found at:
<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/>

Forecasting delivery

- 1.60 The Planning Advisory Service (PAS), through workshops attended by East Suffolk officers in 2019 and 2020, strongly encourages Local Planning Authorities to forecast future delivery with a view to anticipating Housing Delivery Test results. Forecasting likely future results would enable the Council to understand the measures that are likely to apply in the future and to take this into account when considering appropriate actions.
- 1.61 The Government chose to amend the standard method for calculating the 2020 Housing Delivery Test to reflect the impact of the pandemic on the monitoring and delivery of housing. The first lockdown was announced on 23rd March 2020 and came into force on 26th March 2020. The period for calculating the homes required in 2019/20 was reduced by 1 month/ 31 days.
- 1.62 It is possible that the Government may apply similar or other methods to take into account the temporary disruption caused by national lockdowns, local tier restrictions or social distancing on housing delivery throughout the 2020/21 monitoring year. The first national lockdown began on 26th March followed by a phased reopening of schools on 1st June 2020 and non-essential shops on 15th June 2020. The second national lockdown took place from 5th November to 2nd December 2020. The third national lockdown took place from 6th January 2021 to 29th March 2021.
- 1.63 Whilst data that underpins the calculation of the Housing Delivery Test will change over time, the Council can usually anticipate completions with some confidence, based upon the housing trajectories set out in the Statement of Housing Land Supply. The Council considers it helpful to consider the likely future outcomes where possible in order to be informed of any potential future implications of the results.
- 1.64 The 2021 Housing Delivery Test Result for the period April 2018 – March 2021 can be forecast with some accuracy using housing completion data.
- 1.65 For future Housing Delivery Test Results there will remain unprecedented uncertainties caused by the Covid-19 pandemic and its impact on the economy, construction industry and housing market that cannot be fully anticipated at this time. In the absence of any information to the contrary, it should be assumed that the annual Housing Delivery Tests will continue with the same consequences for under delivery to Local Planning Authorities. The Housing Delivery Test is proposed to be retained in the proposals for the new planning system set out in the Government's Planning White Paper (August 2020).
- 1.66 As set out in paragraph 1.61 above, the 2020 Housing Delivery Test results, as published by the Government in January 2021, are as follows:

LPA	Number of homes required ²⁵				Number of homes delivered ²⁶				HDT result
	2017-18	2018-19	2019-20	Total	2017-18	2018-19	2019-20	Total	
East Suffolk	691	886	833	2,410	877	923	832	2,632	109%

Figure 8 2020 Housing Delivery Test results published in January 2021²⁷

- 1.67 The 2021 Housing Delivery Test results, which are proposed by the Housing Delivery Test Rule Book to be released in November 2021 (although are usually delayed until new year), can be anticipated with some accuracy as the completions figures and housing need figures are known.
- 1.68 The housing delivery target in the Suffolk Coastal Local Plan is 542 and, in the Waveney Local Plan is 374 giving a total East Suffolk annual requirement for 916 homes.
- 1.69 The housing need calculated as at 1st April 2020 under the standard method for the Suffolk Coastal Local Plan area is 512 and, for the Waveney Local Plan area is 361 giving a total East Suffolk annual need of 873 homes. This is below 916 and therefore, under the Housing Delivery Test Rule Book, would be applied instead of the requirements in the Local Plans.
- 1.70 East Suffolk monitoring data for 2020-21 has recorded 510 completed dwellings in the former Suffolk Coastal area and 201 completed dwellings in the former Waveney area. Therefore, 711 new homes were completed in East Suffolk in 2020-21.
- 1.71 Both the former Suffolk Coastal and Waveney areas have underdelivered in 2020-21. Low delivery was anticipated due to reported site closures in spring/early summer 2020 reported in the 2020 Housing Land Supply survey responses, the implementation of social distancing measures on sites restricting the numbers of workers, issues sourcing some materials, and other issues caused by the pandemic.

LPA	Number of homes required				Number of homes delivered				2020 HDT result
	2018-19	2019-20	2020-21	Total	2018-19	2019-20	2020-21	Total	
East Suffolk	886	833	873	2,592	923	832	711	2,466	95%

Figure 9 2021 Housing Delivery Test forecast for East Suffolk

²⁵ Based on the [Housing Delivery Test Rule Book](#), which includes transitional measures whereby household projections are applied where plans are over 5 years old.

²⁶ Note - The calculation of homes delivered includes residential institutions and is explained in the Housing Delivery Test: 2019 Measurement Technical Note published alongside the results https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865156/HDT_Technical_Note_2019.pdf

²⁷ 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.

- 1.72 The forecast 2021 Housing Delivery Test result for East Suffolk is 95%. The result may be higher if the Government amends the standard method for calculating the 2021 housing delivery test to reflect the impact of the pandemic on housing delivery. It is not known whether this will be the case, however two possible scenarios are set out below.
- 1.73 The Government could choose to amend the standard method for calculating the 2021 housing delivery test by reducing the period for calculating the homes required in 2020/21 by 1 month/30 days to reflect the lock down in April 2020. The forecast result would then be as follows:

LPA	Number of homes required				Number of homes delivered				2020 HDT result
	2018-19	2019-20	2020-21	Total	2018-19	2019-20	2020-21	Total	
East Suffolk	886	833	801	2,520	923	832	711	2,466	98%

Figure 10 2021 Housing Delivery Test forecast for East Suffolk – 1 month reduction in calculating period

- 1.74 The Government could also choose to amend the standard method for calculating the 2021 housing delivery test by reducing the period for calculating the homes required in 2020/21 by 2 months/ 61 days to reflect the lock down in April and May 2020. The forecast result would then be as follows:

LPA	Number of homes required				Number of homes delivered				2020 HDT result
	2018-19	2019-20	2020-21	Total	2018-19	2019-20	2020-21	Total	
East Suffolk	886	833	727	2,446	923	832	711	2,466	100%

Figure 11 2021 Housing Delivery Test forecast for East Suffolk – 2 month reduction in calculating period

- 1.75 A 95% result or higher will mean there is no requirement to produce a Housing Action Plan or to take any other measures. 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.

Identifying Issues across East Suffolk

1.76 The Council understands that there are several key possible reasons for the under delivery of housing in the former Waveney area which were identified in the 2019 and 2020 Housing Action Plan such as:

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

1.77 Issues of delivery in the former Suffolk Coastal area are less pronounced as demonstrated by the Housing Delivery Test being passed in all years in that part of East Suffolk, other than 2021/21. Nevertheless, the Council needs to be mindful of maintaining delivery and in particular ensuring that the delivery of growth identified in the Local Plan is realised.

1.78 An initial review of national housing policy, strategy and reports carried out in the 2019 and 2020 Housing Action Plans and updated for this 2021 Housing Action Plan identified several local and national issues which appear to potentially be relevant to housing delivery in East Suffolk and are discussed in Section 2;

- 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 do not have the resources or cash flow of volume housebuilders.
- Brexit, the Covid-19 pandemic, and the March 2021 Suez Canal crisis have all had a global impact on logistics affecting access to building materials.
- The Stamp Duty holiday and changes in the way people live and work (caused by the pandemic) have together increased demand for housing that can accommodate home offices and have access to green spaces.

- 1.79 One challenge facing East Suffolk in 2021 is the ongoing uncertainty created by the Covid-19 pandemic. The longer term impacts on the economy, construction industry and housing market in the coming years are currently unknown.

2 Analysis of national and international issues affecting Housing Delivery

Introduction

- 2.1 Builders and developers have faced a number of challenges in 2020/21 that could impact the delivery of housing. In 2020/21 the construction industry has been impacted by the Pandemic, BREXIT, the Suez Canal crisis, the demand for materials arising through HS2 (High Speed 2 rail link) construction and an increase in home building projects.

The impact of Brexit, the Suez Canal crisis and HS2 on construction

- 2.2 Brexit has created a number of challenges and uncertainties for the construction industry. The UK and EU announced a trade deal that came into effect on the 1st January 2021 that does not impose any direct charges on construction or building materials, but there are administrative burdens that will add to the cost of products. At the same time the UK immigration scheme came into operation that it is thought will affect the supply of labour in the construction industry.²⁸ There has been concern that there could be labour shortages.²⁹ The combined effect of the trade deal and immigration scheme on the construction industry are not yet known.
- 2.3 Following the six day blockage of the Suez Canal in March 2021 there were reports nationally of some building materials being more difficult to obtain and causing concern for developers.³⁰ The backlog caused by the blockage was expected to last months delaying the arrival of goods from Asia.
- 2.4 The HS2 scheme to build a fast rail link between London and the North has also been blamed for a shortage in available building materials. Due to the size of the HS2 scheme it is claimed to be causing an acute skills shortage and building material shortage in the West Midlands

²⁸ www.rics.org/uk/products/data-products/insights/the-effect-of-brexit-on-uk-construction/

²⁹ www.constructionnews.co.uk/brexit/labour-shortages-could-raise-rates-at-least-10-29-01-2021/

³⁰ www.constructionnews.co.uk/supply-chain/suez-canal-blockage-concerns-over-impact-on-building-materials-26-03-2021/

where it is impacting on housing building.³¹ The concern is that this could apply pressure on demand for materials and the construction industry elsewhere in the country.

- 2.5 The Construction Leadership Council have found that new house building, work to existing buildings and infrastructure projects have created unprecedented demand for building materials. The supply of some materials such as timber, steel, pitched roofing, plastics, paints and cement are under pressure.³² A survey in the third quarter of 2020 of small and medium sized builders by the Federation of Master Builders found 9 out of 10 were facing rising costs.³³
- 2.6 Despite the pandemic, Savills reported that consent was granted for 270,000 dwellings on sites of 20 dwellings or more in 2020 across England. However, housing completions fell to 215,000 which was 16% less than the previous year.³⁴ Savills has noted that starts on site in 2020 were 24% below levels in 2018.³⁵ This is likely to have knock on effect on housing completions in 2021.
- 2.7 In the first quarter of 2021 Savills noted that housing completions in England were unusually high for a first quarter. Savills attribute this increase to housebuilders prioritising completing homes under construction to satisfy the high level of demand before the original Stamp Duty and Help to Buy deadlines of March 2021. Nevertheless, house completions across the year up to the first quarter of 2021 are down 13% on the previous year. The recovery after the first lockdown has not been sufficient to compensate for the disruption to housing delivery caused. The overall fall in housing delivery has led Savills to predict that only 61% of Local Authorities will pass the 2021 Housing Delivery Test, unless the government changes the method for calculating the housing requirement, as it did for the 2020 Housing Delivery Test results.³⁶
- 2.8 Nationally housebuilders have reported issues with developing housing. Knight Frank conducted a national survey of 50 volume and small and medium enterprise (SME) housebuilders. The biggest challenges reported during the 1st quarter of 2021 were planning delays (33%) and availability of land (21%). The most pressing issues expected over the next three months for housebuilders were identified as availability of land (21%), planning reforms and policy uncertainty (18%) and supply chain delays (15%). The survey results showed SME housebuilders were more affected by labour and material shortages and the impact of achieving net zero carbon targets. Over half of housebuilders found residential

³¹ www.theconstructionindex.co.uk/news/view/hs2-blamed-for-materials-shortages

³² www.constructionleadershipcouncil.co.uk/news/construction-product-availability-statement-3/

³³ www.fmb.org.uk/resource/supply-chain-issues-hamper-recovery-for-builders-says-fmb.html

³⁴ www.savills.co.uk/blog/article/311446/residential-property/residential-development-outlook-2021.aspx

³⁵ <https://pdf.savills.com/documents/English+Housing+Supply+Update+Q1+2021.pdf>

³⁶ <https://pdf.savills.com/documents/English+Housing+Supply+Update+Q1+2021.pdf>

land supply limited and land supply shortages would inevitably lead to an increase land prices and therefore house prices.³⁷

- 2.9 In 2021 housebuilders have to navigate changes to the planning system, including permitted development rights, the ending of the Help to Buy scheme in 2023, and the introduction of First Homes as a new tenure of affordable housing.³⁸ On 31st March 2021 the Housing Secretary Robert Jenrick announced “new rules allowing commercial premises to be converted into homes come into force today, as part of a package of measures to revitalise England’s cherished high streets and town centres”³⁹. The intention is to provide needed homes and enable people to live close to town centres. Further legislation is expected on 1st August.
- 2.10 The pandemic has changed the type of housing buyers are seeking and the priorities of house buyers. Research suggests that people are identifying access to gardens or outdoor spaces and space to work from home as higher priorities when looking for a home.⁴⁰ It is reasonable to expect similar changes in buyers’ circumstances and requirements across the country.

Housing Prices

- 2.11 UK average house prices increased by 8.9% in the year to April 2021 compared to 9.9% in March 2020.⁴¹ The average house price in England increased to £268,000⁴².

³⁷ www.knightfrank.com/research/report-library/uk-res-dev-land-index-q1-2021-7995.aspx

³⁸ www.savills.co.uk/blog/article/311446/residential-property/residential-development-outlook-2021.aspx

³⁹ www.gov.uk/government/news/new-freedoms-to-support-high-streets-and-fast-track-delivery-of-schools-and-hospitals-across-england-introduced-today

⁴⁰ www.savills.co.uk/research_articles/229130/311532-0

⁴¹ www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/april2021

⁴² www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/april2021

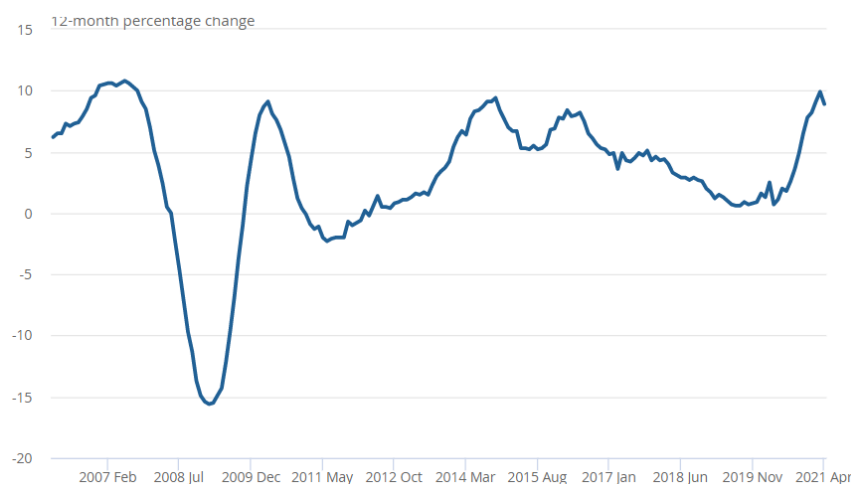


Figure 12 Annual house price rates for all dwellings in the UK (Office of National Statistics)⁴³

- 2.12 The Office of National Statistics noted that the UK's average house price growth accelerated in the second half of 2020 and this trend continued into the beginning of 2021. The growth was supported by changes in Stamp Duty on property purchases.
- 2.13 The Office of National Statistics UK House Price Index England: April 2021 records an increase in average house prices in East Suffolk from £240,284 in April 2020 to £270,149 in April 2021. The average house price increase in East Suffolk is 12.4%. Sale volumes (new build and existing property) in East Suffolk increased from 316 in February 2020 to 331 in February 2021.⁴⁴

Stamp Duty

- 2.14 Residential properties are subject to Stamp Duty and the amount paid depends on the cost of the property and when it was purchased. The Government amended Stamp Duty to support the housing market.

Property or lease premium or transfer value	Stamp Duty Land Tax (SDLT) rate
Up to £500,000	Zero
The next £425,000 (the portion from £500,001 to £925,000)	5%
The next £575,000 (the portion from £925,001 to £1.5 million)	10%
The remaining amount (the portion above £1.5 million)	12%

Figure 13 Rate from 8th July 2020 to 30th June 2021⁴⁵

⁴³ www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/april2021

⁴⁴ www.gov.uk/government/statistics/uk-house-price-index-england-april-2021/uk-house-price-index-england-april-2021

⁴⁵ www.gov.uk/stamp-duty-land-tax/residential-property-rates

Property or lease premium or transfer value	SDLT rate
Up to £250,000	Zero
The next £675,000 (the portion from £250,001 to £925,000)	5%
The next £575,000 (the portion from £925,001 to £1.5 million)	10%
The remaining amount (the portion above £1.5 million)	12%

Figure 14 Rates from 1st July 2021 to 30th September 2021⁴⁶

Property or lease premium or transfer value	SDLT rate
Up to £125,000	Zero
The next £125,000 (the portion from £125,001 to £250,000)	2%
The next £675,000 (the portion from £250,001 to £925,000)	5%
The next £575,000 (the portion from £925,001 to £1.5 million)	10%
The remaining amount (the portion above £1.5 million)	10%

Figure 15 Rates from 1st October 2021⁴⁷

- 2.15 The changes to Stamp Duty are being referred to in the general media as a Stamp Duty Holiday and it was intended to boost the housing market by helping buyers whose finances may have been affected by Covid-19 pandemic. The Stamp Duty tax break was first introduced in July 2020 and was to run until March 2021, but it has been extended until June/September 2021.
- 2.16 The national media has reported that changes in working patterns during the pandemic, with more people working from home, have led to a desire to move out of cities.⁴⁸ House prices grew in 2020 by 6.5%, which is the highest increase since 2015.⁴⁹ Savillis' UK Housing Market Update for December 2020 attributed the prices increase to an increase in demand. Savillis noted that pandemic restrictions have led to people seeking larger homes with access to green spaces. With an increase in working from home people are looking for homes that can accommodate home offices and spend more time in their local area. Savills note that they expect house prices and housing demand to remain high until the end of the stamp duty holiday. This trend is thought likely to result in increasing demand in East Suffolk, a largely rural district but with relatively easy access to London.

⁴⁶ www.gov.uk/stamp-duty-land-tax/residential-property-rates⁴⁷ www.gov.uk/stamp-duty-land-tax/residential-property-rates⁴⁸ www.thetimes.co.uk/money-mentor/article/stamp-duty-holiday-extended/⁴⁹ <https://research.euro.savills.co.uk/united-kingdom/to-publish/pdfs/uk-housing-market-update-december-2020.pdf>

The COVID-19 pandemic

2.17 The Covid-19 virus has caused a global pandemic and the UK Government responded to the emergency by introducing national lockdowns, social restrictions, geographical tiered social restrictions/lockdowns, using track and trace systems and rolling out a national Covid-19 vaccination programme. Inevitably, such measures will have impacts on the construction industry and on the economy more widely and it is therefore important that these are considered in the Housing Action Plan. At the time the 2020 Housing Action Plan was prepared there was considerable uncertainty over the short, medium and long term impacts. Uncertainty over long term impacts still remains however the construction sector has responded to the pandemic and is by and large able to operate within the restrictions.

2.18 Timeline of key Covid-19 events in the UK

26 th March 2020	Lockdown regulations came into force.
11 th May 2020	Department for Business, Energy and Industrial Strategy published Working safely during coronavirus (COIVD-19).
1 st June 2020	Lockdown eased with phased reopening of schools and introduction of the 'rule of six' for outdoor gatherings.
15 th June 2020	Non-essential retail shops re-open.
22 nd July 2020	Business and Planning Act (22 July 2020) includes extension of time limits for planning permissions and listed building consents that have lapsed or are due to lapse in 2020, and the ability to apply for changes to construction hours to support safe working practices on site.
14 th October 2020	Three-tier system of restrictions comes into force.
5 th November 2020	Second national lockdown started.
2 nd December 2020	Second national lockdown ends.
5 th January 2021	Third national lockdown started.
8 th March 2021	Lockdown eased with phased reopening of schools.
28 th March 2021	Lockdown eased with introduction of the 'rule of six' for outdoor gatherings.
12 th April 2021	Non-essential shops, pubs, restaurants and libraries reopen.
17 th May 2021	Rule of six scrapped outdoors and indoor hospitality and small outdoor sport venues reopen.
19 th July 2021	A number of remaining restrictions lifted.

Impacts of COVID-19 restrictions on the construction industry

2.19 The construction industry was exempt from the lockdown requirement to close that came into force on the 23rd March 2020⁵⁰, but have nevertheless been impacted by the pandemic. The construction industry has had to manage the risk of Covid-19 to employees. Businesses

⁵⁰ <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/construction-and-other-outdoor-work>

of 5 or more employees had to produce a risk assessment and businesses had a duty to consult people on health and safety.

2.20 All construction business had to consider who was needed on site, plan for the minimum number of people needed to operate the site safely and effectively and monitor their staff's wellbeing. Business may have been affected by staff or staff family members who were classed as clinically extremely vulnerable or clinically vulnerable therefore advised not to work outside the home and self-isolate or have needed to be offered the safest available on-site roles enabling them to stay 2m away from others.

2.21 On the 11th May 2020 the Department for Business, Energy and Industrial Strategy published 'Working safely during coronavirus (COVID-19)' that included guidance on moving around buildings and worksites. 2m social distancing was to be maintained wherever possible, increased handwashing, using screens or barriers to separate people, working back-to-back or side-to-side rather than face-to-face, and reducing the number people each person has contact with. The recommended worksite steps included:

1. *"Reducing movement by discouraging non-essential trips within buildings and sites. For example, restricting access to some areas, encouraging use of telephones or other electronic devices, where permitted, and cleaning them between use.*
2. *Reducing job rotation and equipment rotation, for example, single tasks for the day.*
3. *Implementing one-way systems where possible on walkways around the workplace.*
4. *Using signage such as ground markings or being creative with other objects to help people comply with social distancing guidelines (2m, or 1m with risk mitigation where 2m is not viable), to allow controlled flows of people moving throughout the site.*
5. *Reducing occupancy of vehicles used for on-site travel, for example, shuttle buses, and when needed, social distancing measures should be followed within the vehicles.*
6. *Separating sites into working zones to keep different groups of workers physically separated as much as practical.*
7. *Planning site access and 'area of safety' points to enable social distancing.*
8. *Reducing the number of people in attendance at site inductions and consider holding them outdoors wherever possible with social distancing.*
9. *Managing use of high traffic areas including corridors, lifts, turnstiles and walkways to maintain social distancing."*⁵¹

2.22 Other recommendations included staggering shift patterns and working hours, increasing vehicle and cycle parking, reduce work related travel, use of Personal Protection Equipment

⁵¹<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/construction-and-other-outdoor-work#outdoors-3-2>

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

- 2.23 The objectives for moving around buildings and worksite, as detailed above, remain in place. On July 19th 2021 the Country moved to Step 4 of the Government's roadmap out of lockdown with all legal limits on social contact removed.⁵²

Legislative support for the construction industry

- 2.24 The Government provided Planning guidance to accompany the Business and Planning Act (22nd July 2020).⁵³ Benefits of the legislation to the construction industry include extensions of time limits to unimplemented planning permissions and changes to working hours on construction sites.
- 2.25 Legislation was put in place to provide opportunities for implementation of planning permissions and listed building consents that lapsed between 23rd March 2020 and 31st December 2020.
- 2.26 Unimplemented full planning permissions due to lapse between 19th August and 31st December 2020 were automatically extended to 1st May 2021. Applicants did not need to take further action for extension of time to take effect and there was no requirement to obtain Additional Environmental Approval.
- 2.27 Full planning permission that lapsed between 23rd March and 18th August could be extended until 1st May 2021 however this was dependent on the granting of Additional Environmental Approval, which in turn is dependent on the original permission having been subject to Habitats Regulations Assessment or a payment through the Recreation Avoidance and Mitigation Strategy (RAMS). Three Additional Environmental Approval applications have been received and two have been granted. The two applications granted related to a 60 bed care home and a first floor extension to the front of a care home.
- 2.28 Listed Building Consents due to lapse between the 23rd March and 31st December 2020 were automatically extended to the 1st May 2021 and were not subject to a requirement to obtain Additional Environmental Approval.
- 2.29 Outline planning permission with time limits for implementation between 19th August and 31st December 2020 were automatically extended to 1st May 2021. Outline planning permission with time limits for implementation between 23rd March and 18th August 2020 were extended to 1st May 2021 if Additional Environmental Approval is granted in respect of

⁵² www.gov.uk/government/publications/covid-19-response-spring-2021/covid-19-response-spring-2021-summary#step-3---not-before-17-may

⁵³ <https://www.gov.uk/government/publications/construction-working-hours-draft-guidance>

the relevant planning permission. Any time limit for the submission of applications for approval of reserved matters which would have expired between 23rd March and 31st December 2020 was extended to 1st May 2021.

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

Impacts of COVID-19 on the construction industry in East Suffolk March – August 2020

- 2.33 The East Suffolk Building Control service provided initial anecdotal reports in spring 2020 on the impact of the Covid-19 on construction industry in East Suffolk. Building Control Officers reported that that all the medium to large developer sites closed temporarily, including those managed by Persimmon, Bloor and Wellington.
- 2.34 Early conversations between Building Control Officers and site agents and small/medium developers showed that some of the skilled labour professions are in greater demand than usual. This was in part considered likely to there being a shortage of skilled trades in general (even before lockdown). Many sites employ subcontractors and sites closures and delays resulted in some subcontractors furloughing staff. The delayed demand for skilled labour meant that sites that kept working for longer maintained access to skills which enabled progress and sites which closed were struggling to get subcontracted skilled labour to return from furlough. It was noted that electricians were very sought after.
- 2.35 Building Control Officers found that site operations had been smooth and well managed, the site operatives are already highly experienced and responsible with personal protection equipment (PPE), and restrictions were adopted and implemented well. Site visitors who were less experienced posed a greater challenge which saw the sites limit access consistently. Smaller sites on occasion had appeared less organised due to the transient nature of the operatives who may pass between the smaller sites whilst subcontracting. Site

operatives remain on larger sites for longer, many of them for the entire development, and therefore adopt site measures with a greater understanding and commitment.

- 2.36 At the time, delays or problems due to supply chain or accessing materials were thought to become more apparent in the months ahead. Building Control Officers found many construction professionals are worried about this and there was concern that larger developers will purchase in bulk which may leave holes within the supply chain for others (particularly small to medium builders). The products which appeared to be harder to source were finishing materials such as Gypsum plaster and specific timber products.
- 2.37 During the early period of the Covid-19 pandemic plaster had been hard to source and when it was made available there had been bulk buying resulting in excessive price increases and double handling for resale at elevated prices. Building Control Officers were regularly being asked if they knew anywhere with plaster available. Shortages were caused by British Gypsum stopping production due to the lockdown and as plaster is a product which has a use by date it is not stockpiled.
- 2.38 Site inspections were temporarily suspended, however at the beginning of June 2020 Building Control Officers were able to undertake completion inspections in unoccupied properties (newly built). During the non-inspection period only a limited number of completions for priority sales were undertaken. Numbers of completions are now growing.

Impacts of COVID-19 on the construction industry in East Suffolk August 2020 – July 2021

- 2.39 East Suffolk Council's Building Control officers have not reported any construction sites being closed since the end of the first lockdown in June 2020 or any construction on sites experiencing serious delays. Builders, contractors and developers appear to have been working consistently since June 2020 on sites of all sizes.
- 2.40 At the beginning of May 2021 however Building Control officers noted that site progress has been slower in some cases due to lag times on material orders or merchant product availability. In early May 2021 Building Control had not heard of any significant product shortages although there are fears for the future with regard to material supplies. At that time the main issue with the supply chain had been the time taken for products to arrive on site in quantity due to the reduced flow of products nationally and internationally. It was certainly harder to receive specialist products which may be custom made or are sourced from further away due to the pandemic's pressure on logistics.
- 2.41 By the end of July 2021 Building Control Officers had witnessed changes in the availability and cost of materials. The price of materials are reported to have increased to unprecedented levels, with many price changes reportedly being unannounced. The price of timber products and sheet materials is understood to have increased by 40-50%. The availability of cement and plaster had been fluctuating due to shutdowns in production. It

has been reported that bags of plaster have increased from £5-6 to £9 and steel from £600-700 per tonne to over £1,000 due to global and national shortages.

- 2.42 Building Control Officers are aware of a scheme where the cost roof trusses quoted in March 2021 more than double by June 2021. The increase in the cost of building materials is understood to have necessitated the redesign of schemes which has in turn caused onsite construction delays. It can be difficult to alter designs around material shortages and price increases, when it is not known how long these shortages and changes will last.
- 2.43 In May 2021 Building Control officers had not experienced or been made aware of any significant skilled labour shortages. Interestingly they had been contacted by a number of people seeking work opportunities within construction as so many people can see the sector remains open whereas their current employment outside the sector has been halted.
- 2.44 By the end of July 2021 Building Control Officers were noting changes in staff availability. The track and trace scheme has been notifying (pinging) people when they have come into contact with someone who has tested positive for Covid-19 and requiring people to isolate. This has led to a what is commonly now known as a “pingdemic” with significant numbers in isolation unable to work. In June 2021, one builders’ merchant in East Suffolk reportedly had 11 of their 13 staff isolating which caused the store to temporarily close. The “pingdemic” may lead to further supply chain issues with production shutdown and stores closed. The “pingdemic” may also impact staff availability onsite during construction.
- 2.45 Building Control Officers believe that the pressures are pretty consistent for all construction companies, but the larger developers have been far more in control of their site operations due to the ownership and management of their development. There was initially a worry among builders that many people will see non-essential building projects as something which can wait and this will have a negative impact for the small and medium builders in particular. In contradiction to that however officers know of many small to medium builders who are receiving high numbers of requests for alterations, extensions and outbuildings to accommodate home offices, where before the pandemic this was relatively uncommon. Whilst helping to meet housing needs in a wider sense, this sort of work does not however have a direct positive impact on meeting the requirements for new housing in the Local Plans.
- 2.46 There has been no real sign of the level of applications to Building Control falling in any particular area of East Suffolk, the work that officers are pricing is slightly below pre-pandemic numbers but continues to pick up.
- 2.47 Officers have spent a great deal of time communicating with developers seeking opportunities for Building Control tender. There have been many planning approvals for large developments issued in recent weeks/months and Building Control has been granted the opportunity to provide tenders for these projects but have not received responses or acceptances within a timeframe that would usually be expected. The reason for this is unknown but it could potentially mean that the developers are pricing every part of a development without actually planning to commence the development in the usual timeframes.

Impact of Covid-19 on housing delivery in East Suffolk March – August 2020

2.48 East Suffolk Council carried out an annual Housing Land Supply survey in June and July 2020. Landowners, agents, applicants, and developers were contacted for information regarding the progress of housing delivery on sites allocated within the Local Plans or Neighbourhood Plans, with planning consent or under development. Additional questions regarding the impact of Covid-19 restrictions on development were added to the Housing Land Supply survey. Analysis was carried out on 38 responses, primarily from developers, on sites that are under development or due to deliver completed houses within the next five years. Sites ranged in size from those allocated for 10 dwellings to 850.

2.49 The Covid-19 related questions included in the survey were:

- Q8. Have the Covid-19 restrictions resulted in delays in bringing the site forward (other than construction), for example delays to on-site surveys or marketing the site?
- Q9. What measures have you taken / do you intend to take to address these issues?
- Q10. Did Covid-19 result in the site being closed, either preventing development from starting or existing construction continuing?
- Q11. Have Covid-19 restrictions resulted in any on site delays caused by staff issues, such as staff availability/social distancing rules?
- Q12. Have there been any on site delays due to supply chains and accessing materials?
- Q13. Has Covid-19 impacted on housing demand, for example sale enquiries, viewings and house sales?
- Q14. Is the anticipated housing delivery figure provided in question 8 above lower than pre Covid-19 expectations?
- Q15. What do you envisage will be the greatest challenges to the house building industry over the next few months? What are you doing to overcome any challenges for this site?

2.50 One of the most notable features of the survey was that the majority of respondents answered no, not applicable, or left answers blank. This indicated that over 50% were not or had not yet experienced delays in bringing a site forward (20 respondents), were not taking any measures to address current or potential future delays (20 respondents) and had not closed the site or been prevented from starting development (23 respondents). Approximately 75% had not found Covid-19 restrictions resulting in on-site delays (28 respondents), or experienced delays due to supply chains or accessing materials (29). Over 50% had not experienced any impact in housing demand (24 respondents), or anticipated change in housing delivery rates (25 respondents).

- 2.51 It should be noted that answers may have been marked not applicable or left blank as they were not relevant to the current stage of development or there was too much uncertainty at the time to be able to provide an answer. Of the sites that were delivering housing or had declared an intention to deliver housing in 2020/21 half had experienced some form of delay (7 out of 14 respondents).
- 2.52 The types of delays to bringing sites forward (other than construction) varied. The two key reasons were delays to surveys being carried out as consultant's staff were furloughed or due to social distancing restrictions (5 respondents), and marketing put on hold due to lack of interest, the ability to show houses, mortgages withdrawn, and market confidence (5 respondents). Other reasons included funding issues, the need to reassess JCT (Joint Contracts Tribunal) Design and Build contracts and delays progressing a S106 agreement.
- 2.53 Various measures were taken by developers to address the issues identified above. Once lockdown restrictions eased discussions resumed with consultants, meetings were held via conference calls, extra personal protection equipment (PPE) was provided to staff on site, home viewings were made by appointment and applicants started working with Planners. Two respondents of small sites of 10 or less dwellings in villages noted they were postponing activity for up to a year and this could be extended if the market did not recover. However, one developer noted the market was now extremely active and they were responding to very active enquires. Reduced rates of Stamp Duty Land Tax (SDLT) were to apply to residential properties purchased from 8th July 2020 to the 31st March 2021 and a developer noted using the reduction in SDLT as a new marketing feature.
- 2.54 11 construction sites closed or delayed commencement of construction, and a further 4 experienced delays to on-site progress. Reasons for on-site delays included the need to change on-site practices to comply with social distancing. Site closures and on-site delays affected sites of all sizes. Several developers noted the closures lasted six weeks.
- 2.55 8 developers had experienced site delays due to supply chains and accessing materials with one noting it was the biggest issue they were facing.
- 2.56 Over 60% of respondents recorded no issues with housing demand. 6 respondents reported housing demand had slowed with fewer enquiries viewings. Others noted sales values were holding and that the residential market was very active once house viewings were permitted again. Several noted that if/ when the housing market slows they consider it is likely to happen in 2021.
- 2.57 Anticipated housing delivery was considered to be lower than pre-Covid-19 levels by 13 respondents as projects now take longer due to delays and slower progress that pushed back delivery programmes. One developer forecast a 20% reduction in housing delivery over the next five years, and others that delivery numbers would be lower in the first year (2020-

21). One developer anticipated that lower delivery in 2020-21 would result in an increase in delivery in 2023-24. Another developer considered delivery slower than planned but expected overall delivery to be the same by the end of the year.

- 2.58 Respondents did not provide consistent answers on the greatest challenges facing the house building industry for the following months. Key concerns were availability of materials and sales/values. Challenges facing house building varied from funding, buyers with existing properties to sell, cost of delivery, the ability to react efficiently to changes in lockdown restrictions, availability of finance for buyers, and increases in build costs.
- 2.59 East Suffolk officers had also been engaging closely with other Suffolk LPAs and sharing experiences of Covid-19 impacts and noted housebuilder activity. This was aided by various cross county groups such as the Major Sites Forum. This joint working helped to ensure that consistent support could be provided across authorities and learning was gained on how best to support housebuilding flexibly.

Impact of Covid-19 on housing delivery in East Suffolk August 2020 – July 2021

2021 East Suffolk mini covid related survey

- 2.60 East Suffolk Council carried out a mini survey at the beginning of March 2021 to assess whether there were any ongoing issues affecting housing delivery in East Suffolk caused by the pandemic. The survey was a follow up to the Covid-19 questions added to the Housing Land Supply survey carried in June and July 2020.
- 2.61 The mini survey was sent to developers, landowners and agents who had responded to the Covid-19 related questions attached to the 2020 Housing Land Supply survey. The mini survey asked 8 covid related questions.
- 2.62 The Covid-19 related questions included in the survey were:
- Q.1 Have the Covid-19 restrictions resulted in delays in bringing the site forward (other than construction), for example delays to on-site surveys or marketing the site?
 - Q.2 What measures have you taken / do you intend to take to address these issues?
 - Q.3 Has Covid-19 resulted in the site having to close at any time, either preventing development from starting or existing construction continuing?
 - Q.4 Have Covid-19 restrictions resulted in any on site delays caused by staff issues, such as staff availability/social distancing rules? Please provide details of any impacts on this development.
 - Q.5 Have there been any on site delays due to supply chains and accessing materials?

Q.6 Has Covid-19 impacted on housing demand, for example sale enquiries, viewings and house sales?

Q.7 Is it anticipated that housing delivery will be lower than pre Covid-19 expectations?

Q.8 What do you envisage will be the greatest challenges to the house building industry in the short and medium term? What are you doing to overcome any challenges for this site?

- 2.63 The mini survey only received 2 responses. It is recognised that developers, landowners and agents have no obligation to respond to the Council's enquiries. The two responses considered that the planning system had held up development of the site and were unable to comment regarding the impact of the pandemic on the sites' development.
- 2.64 The pandemic caused factories to close, production to slow and had a detrimental impact on global logistics and the supply of building materials. In December 2020 there were national reports of timber supplies being under pressure and the disruption expected to last for several months.⁵⁴
- 2.65 The lack of responses could indicate that the construction industry is operating normally, fairly close to normal or have adjusted their working methods to adapted to social distancing restrictions to achieve a new standard of working. It is known that some agents do not receive payment from clients for responding to Council surveys and general enquires. Responding to surveys and enquires from the Council is therefore not necessarily priority.
- 2.66 Housing Delivery and the Housing Action Plan was an item at Council's virtual Developers' Forum on the 23rd of April 2021. The issues reported in the 2020 Housing Land Supply survey were reported to attendees including temporary closure of construction sites, issues with material supply, particularly gypsum, and longer-term concerns regarding market uncertainties. Those attending the forum were asked the following questions:
- Q.1 Are any of the issues we reported last year still ongoing?
- Q.2 Are there any new issues that affect delivery?
- Q.3 What could the Council's Housing Action Plan do to address any issues?
- 2.67 Developers were largely silent and little feedback was received. There were no specific issues the Council was asked to address that would help with housing delivery. Attendees were told that the Housing Land Supply survey would be issued in due course and offer another opportunity to discuss housing delivery and any measure the Council could take to assist delivery.

⁵⁴ www.constructionnews.co.uk/supply-chain/timber-supplies-under-pressure-well-into-2021-11-12-2020/

2021 East Suffolk annual Housing Land Supply questionnaire

2.68 East Suffolk Council carried out its annual Housing Land Supply survey in June and July 2021. Landowners, agents, applicants, and developers were contacted for information regarding the progress of housing delivery on sites allocated within the Local Plans or Neighbourhood Plans, with planning consent or under development.

2.69 The 2021 Housing Land Supply survey included the following questions:

Q.6 Are there any matters affecting development coming forward on the site? If so, what is being done to address these? *For example, refer to any matters relating to ownership issues, viability issues or infrastructure requirements, such as successful participation in bids for large-scale infrastructure funding or similar projects. Please also refer to anything related to the Covid-19 pandemic such as site closure, supply of materials, staff isolating and availability, impact of social distancing, the housing market and any future uncertainties.*

Q.7 Is there anything that the Council can do to assist in the delivery of development?

Q.9 Please provide any other comments or relevant information.

Q.10 We would like feedback on the process of obtaining housing delivery information. If you have any comments on the way we contact you, please let us know. *For example, is there a more convenient method for contacting you? Do other Councils have a method for gathering housing delivery information that you recommend?*

2.70 The initial closing date for responses to the survey was Friday 2nd July and 41 responses had been received at this time (further responses were received after this time). 18 respondents provided some information in regard to questions 6, 7 9 and 10. In some cases responses confirmed there were no issues or information to report.

2.71 Survey responses reported that the key matters affecting developments coming forward were planning issues, the pandemic causing delays and highway issues. Other developers mentioned specific issues including an overage that prevented development for a period of time, a drainage issue, the need for an archaeological survey and the need for a further ground survey.

2.72 The planning issues raised were delays determining planning applications and impact of Community Infrastructure Levy (CIL). The development of four sites were impacted by the pandemic being an issue. There was concern that the market for apartments, unlike housing, is not strong and building cost inflation has been extremely high. Two noted issues with the availability of professionals, trades people and materials. There is also concern for the long-term housing market performance.

- 2.73 Responses to the question asking what the Council could do to assist the delivery of housing focused on changes/reduction of CIL and S106 obligations and help liaising with Suffolk County Council Highway and Environment Health Officers. Two respondents mentioned the development of Residential Development Briefs for individual sites and requested they be concise, flexible, responsive to the market and prepared with the landowner's co-operation and involvement.
- 2.74 Under other comments or relevant information respondents highlighted CIL and the availability of and cost of materials and contractors as issues. The majority of respondents did not provide any further information.
- 2.75 Those who responded to the question regarding the process of obtaining housing delivery information all confirmed they were happy to be emailed the annual Housing Land Supply survey. None mentioned any issue with the current process or requested any changes.

Impact of Covid-19 on East Suffolk Council's own housing development March – August 2020

- 2.76 East Suffolk Council's Housing Team has a three year rolling development programme which seeks to deliver 50 plus new affordable homes each year to help overcome the shortage of both general and specialist housing in East Suffolk. Where possible these homes are being delivered in areas identified as having the greatest housing need.⁵⁵
- 2.77 The Covid-19 pandemic resulted in delays in site surveys, condition surveys, and defects inspections due to restrictions in place on 'non-essential' travel, and risk assessments which do not allow for individuals to enter buildings / properties in groups. Initial project meetings were delayed as these are often done on site as a walk around with the design team.
- 2.78 The East Suffolk Housing Team made revisions to the programme of delivery to compensate for unavoidable delays. Meetings were held virtually with the use of existing photos / google earth etc. Visits took place following guidelines such as one person enters a building at a time and discussion takes place externally at 2m distances.
- 2.79 Despite measures taken to minimise disruption, the sites at Woodside in Brampton and Monckton Avenue in Lowestoft were both closed for a period of time preventing further construction of the proposed units. The Housing Team received extension of time requests for completion of developments at Brampton and Monckton Avenue. The reason for delay was a combination of site shut down days, delays in the supply chain and prolongation of programmed works following the return to work plan being implemented in accordance with

⁵⁵ <https://www.eastsuffolk.gov.uk/housing/affordable-housing/building-affordable-housing/>

social distancing e.g. the number of trades within individual units are restricted which has added to the time taken to complete the units.

- 2.80 The Housing Team have received feedback from construction partners that indicated that significant delays had been experienced with supply chains and accessing the materials needed in order to progress development accordingly. As a result, this had slowed progress and impacted anticipated completion dates.
- 2.81 The immediate housing demand increased due to the Council being required to provide accommodation for all rough sleepers, some of whom would not ordinarily rely on services provided by the Council for accommodation. Longer term the Housing Team anticipated the economic impact will increase demand on the Housing Service due to the loss of income for some individuals and families within the district.
- 2.82 The number of houses the Housing Team expected to deliver has not changed. The Team continued with the programme as planned however some tenures were re-prioritised to meet the immediate demand as a result of Covid-19 (Houses of Multiple Occupation). However, with reference to the wider housing market across all tenures the Housing Team believed it would be too early to accurately predict the impact of Covid-19 on housing delivery.
- 2.83 The Housing Team anticipated challenges in delivery time due to the on-going social distancing guidance, it is thought that over time these additional processes / procedures will delay the construction of affordable housing throughout the UK. Many construction workers are from European countries or work away from home for significant periods of time, and this was also thought to possibly be less desirable in the following months with restrictions on travel and quarantine requirements.
- 2.84 There was concern that some construction companies would not survive in the challenging economic environment and there will be questions around the competitiveness of the market. Supply of the appropriate materials and products and the necessary amounts required were considered to be a challenge going forward bringing into question the affordability of some sites. Maintaining on site social distancing in accordance with guidelines and sourcing accommodation for construction workers that may be working away from home were also thought to potentially cause issues.

Impact of Covid-19 on East Suffolk Council's own housing development August 2020 – July 2021

- 2.85 East Suffolk housing development has gone through a number of changes both due to the Council's aspirations to build and also the level of internal capacity to deliver new homes.

- 2.86 In the two years prior to the pandemic the Council developed 33 and 38 houses. This dropped to 12 houses in 2020/21. The lower number in 2020/21 reflects the internal restructure and changes made within the Housing Team as well as the impact of the pandemic. The Housing Team has plans to increase housing delivery in the next few years to meet and then exceed the target of 50 dwellings a year. Further information on the Council's programme of housing development is contained in Chapter 3.

Year	Target	Completed	Breakdown New Build – S106 purchase or ESC delivered Redevelopment – Refurbishment / conversions of existing assets or acquisitions.
2016/17	50+	11	New Build - 9 Redevelopment - 2
2017/18	50+	5	New Build - 5 Redevelopment - 0
2018/19	50+	33	New Build - 24 Redevelopment - 9
2019/20	50+	38	New Build - 36 Redevelopment - 2
2020/21	50+	12	New Build - 9 Redevelopment - 3

Figure 16 East Suffolk Housing Team development

3 Housing Delivery Analysis

Introduction

- 3.1 Local housing delivery is affected by numerous local issues that can determine when development starts on site and the speed at which housing on site is delivered. Some issues relating to the housing market, site conditions, land ownership, availability of local house builders, and the phasing of developments is beyond the influence of the Council. However, the Council's Planning Service plays a key role in supporting housing delivery through efficient determination of planning applications, negotiation of S106 agreements and through the preparation of planning policy documents.

Analysis of time spent determining applications

- 3.2 The planning process follows a similar pattern for all applications. Pre-application advice⁵⁶ is not compulsory but is highly recommended for all applications. It can reduce the number and complexity of issues that need resolving during the application process, enabling quicker and more proactive decision making.
- 3.3 Planning applications must be validated to ensure that all the necessary information has been submitted and there is public consultation with statutory consultees, non-statutory consultees and neighbours notified. Additional information or minor revisions that would improve and make an application acceptable may be submitted. Large developments require a S106 agreement and developers are supported by the Council to submit and negotiate legal under-takings as early on as possible.
- 3.4 The Government has set the statutory time limit of 13 weeks for determining major developments (see definition in paragraph below) and eight weeks for all other applications. A 16 week limit applies to applications subject to an Environmental Impact Assessment.
- 3.5 For housing, any application of 10 or more units, or development on 1 hectare or more, is classed as a major development.⁵⁷ 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.

⁵⁶ <https://www.eastsuffolk.gov.uk/planning/planning-applications/pre-application-planning-advice/>

⁵⁷ The Town and Country Planning (Development Management Procedure) (England) Order 2010, Part 1 Preliminary, 2, <http://www.legislation.gov.uk/uksi/2010/2184/made>

- 3.6 The data in the graph below highlights the wide-ranging amount of time it takes to determine a planning application. Household applications and minor applications (less than 10 homes or development on less than 1 hectare) are usually determined within the Government's 8 week target and major applications are usually determined within the Government's 13 week target. Where applications have taken a long time, possibly over a year to determine, it is usually due to time spent negotiating changes in the design and layout of proposals.

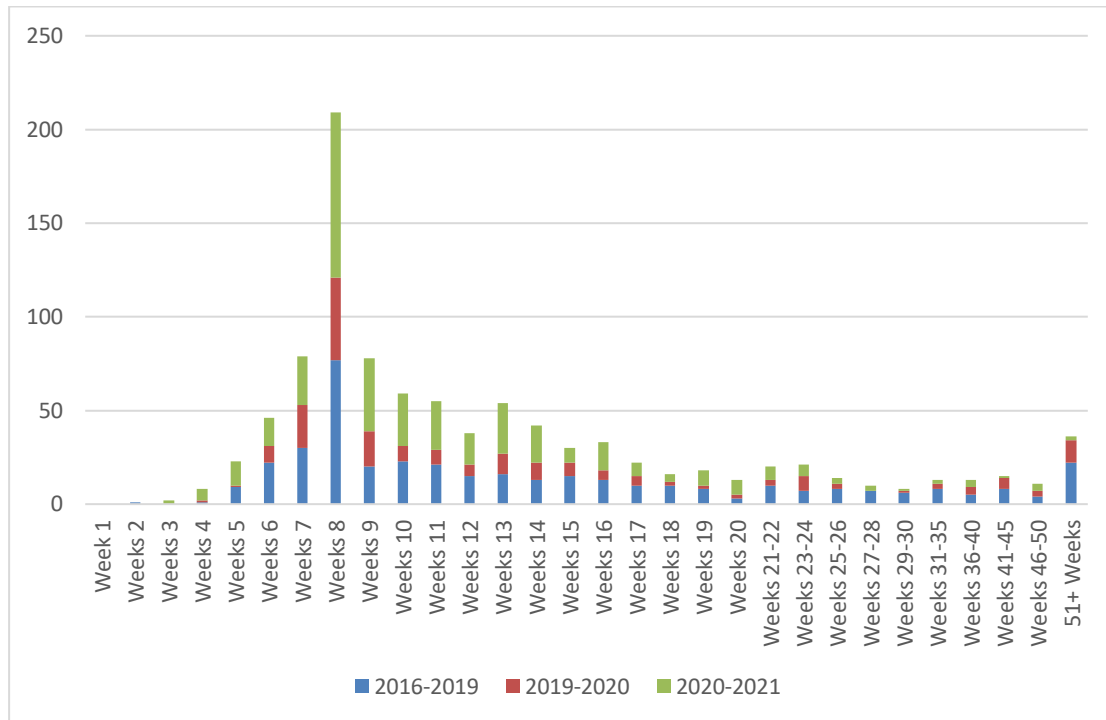


Figure 17 Length of time in weeks to determine housing planning applications in former Suffolk Coastal and Waveney areas from 1st April 2016 – 31st March 2021

- 3.7 The Development Management Team continued to operate throughout the pandemic. 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. Extension of planning application determination timescales are agreed with agents/applicants when additional time, for example to allow for amendments to applications or to seek to address consultation comments, is considered appropriate.
- 3.8 The Development Management Team determined 205 planning applications for new dwellings in 2019-2020, in addition to householder planning applications and planning applications for other uses and forms of development. In 2020-2021 the Team determined 390 planning applications for new dwellings, almost double the previous year. In 2019-20 78, or 38%, of applications were determined within 8 weeks and in 2020-21 150 or 38% were determined within 8 weeks.

- 3.9 During the pandemic the number of planning applications for new dwellings significantly increased but the speed and efficiency of the Planning Team in determining the applications remained the same. This was despite changes in working conditions for Planning Officers that resulted from lockdowns and social restrictions.
- 3.10 The information gathered by the Planning Team indicates that building work may have slowed during the pandemic with the number of housing competitions reduced compared to previous years. It appears developers and landowners have used the pandemic to focus on submitting planning applications for new dwellings, suggesting a strong confidence in the future housing market.
- 3.11 Despite a number of planning applications taking longer than 13 weeks to determine, East Suffolk are meeting the government's targets for determining planning applications (see later section on speed of determination).

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

3.12 The following graph reviews completed developments and shows the number length of time from consent to work starting on-site in former Suffolk Coastal and Waveney District areas for dwelling completed in the years 2019/20 and 2020/21.

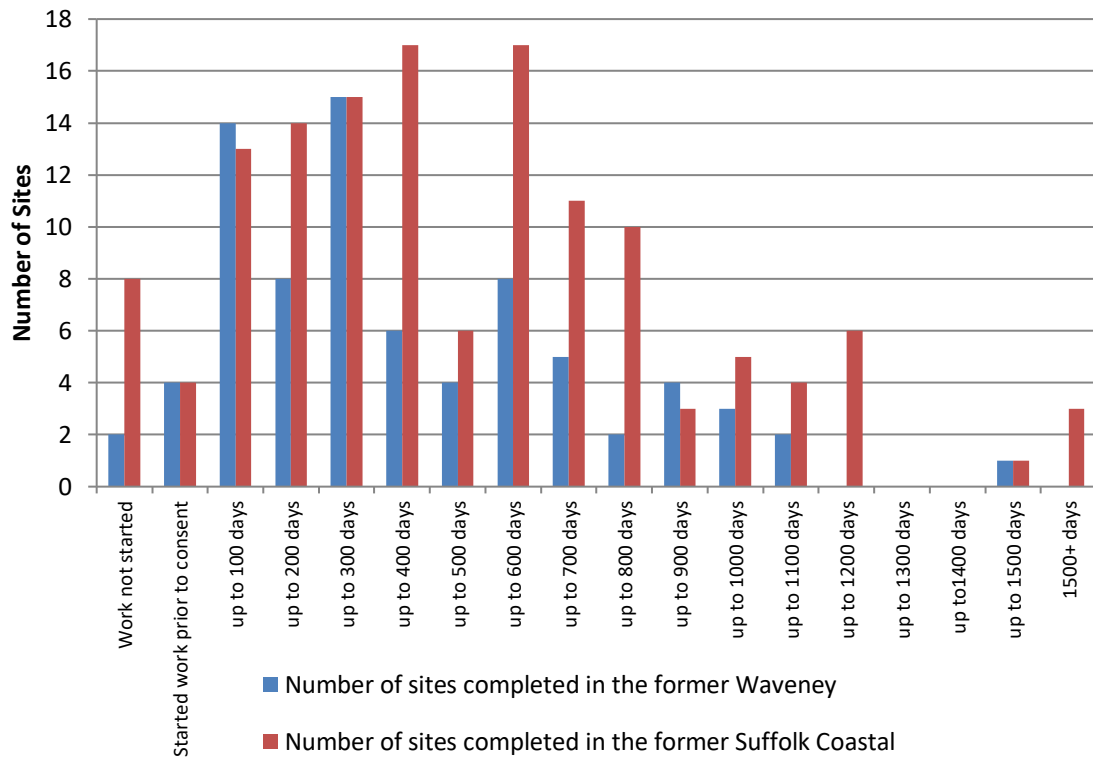


Figure 18 The length of time from consent to work starting on site for housing developments completed between 1st April 2019 – 31st March 2020

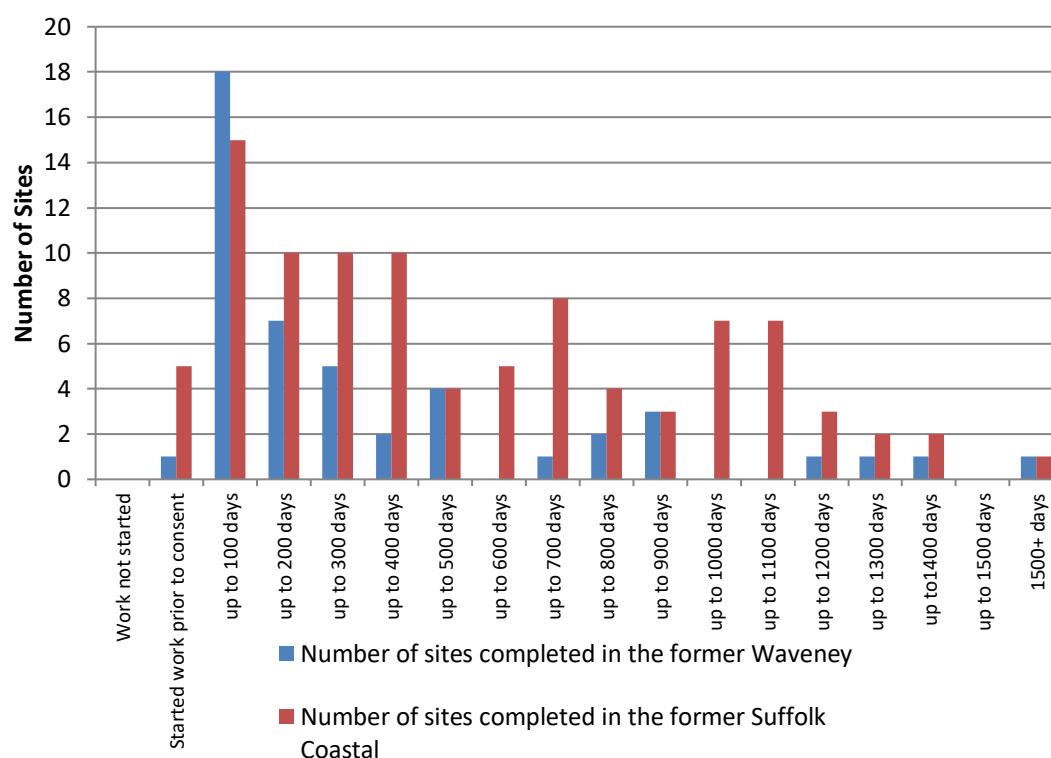


Figure 19 The length of time from consent to work starting on site for housing developments completed between 1st April 2020 – 31st March 2021

- 3.13 In the year 2019/20 50% of the former Suffolk Coastal area developments started within 390 days of consent being granted. Sites included 2 large (50-499 units) sites, 5 medium (10-49 units) sites and 130 small (0-9 units) sites. 75 of the sites are on 'greenfield' land and 62 are on previously developed land.
- 3.14 In the year 2020/21 50% of the former Suffolk Coastal area developments started within 560 days of consent being granted. Sites included 3 large sites, 7 medium sites and 86 small sites. 51 of the sites are on 'greenfield' land and 45 are on previously developed land.
- 3.15 The graphs for 2019/20 and 2020/21 show a slight increase in the number of large and medium sites in the former Suffolk Coastal area and significant decrease in the number of small sites. The length of time from planning consent to work starting on site has also significantly increased. Some changes would be expected due to the pandemic and adoption of a new Local Plan. These changes will be carefully monitored in the next few years and appropriate action were necessary.
- 3.16 In the year 2019/20 50% of the former Waveney area developments started within 260 days of consent being granted. Sites included 3 medium sites and 75 small sites. 43 of the sites are on 'greenfield' land and 35 are on previously developed land.
- 3.17 In the year 2020/21 50% of the former Waveney area developments started within 130 days of consent being granted. Sites included 2 medium sites and 45 small sites. 18 of the sites are on 'greenfield' land and 29 are on previously developed land.

- 3.18 In East Suffolk over 50% of the sites developed delivered a single dwelling, highlighting the cumulative importance of small developments to overall housing delivery. While 50% of the total number of new dwellings are delivered on a small number of large sites of 50-499 units. This pattern of the site size and delivery is repeated across East Suffolk.
- 3.19 The 2019 and 2020 Housing Action Plans also provided detailed analysis of sites that take a long time to start work on site and the size of these sites. It isn't considered necessary to update this information this year as it is considered that the data above shows a similar pattern. The overall reasons/issues identified are considered to remain the same and there do not appear to be any district-wide issues that would specifically need to be addressed.

Impact of new legislation on applications

- 3.20 The Business and Planning Act 2020 temporarily modified the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990. The legislation provided opportunities for implementation of planning permissions and listed building consents that lapsed between 23rd March 2019 and 31st December 2020. Unimplemented full planning permissions and listed building consents due to lapse between 19th August and 31st December 2020 were automatically extended to 1st May 2021. Full planning permission that lapsed between 23rd March and 18th August 2020 could be extended until 1st May 2021 however this was dependent on the granting of ‘additional environmental approval’. For outline permissions that would have expired between 23rd March and 31st December 2020, the date by which a Reserved Matters application must be submitted was extended to 1st May 2021.
- 3.21 The number of applications that lapse without starting on site in East Suffolk are usually few in number. The majority of planning applications for housing that may benefit from the legislation extending the time limit for planning permission are small windfall sites providing 1 or 2 dwellings. The requirement for ‘additional environmental approval’, which in turn is dependent on the original permission having been subject to Habitats Regulations Assessment or a payment through the Recreation Avoidance and Mitigation Strategy means that it was unlikely that this would generate many additional completions and impact on housing delivery. There were three applications for Additional Environmental Approval and two have been granted. The two applications granted related to a 60 bed care home and a first floor extension to the front of a care home.

Impact of new infrastructure, investment and regeneration on housing delivery

- 3.22 There are two specific infrastructure projects in East Suffolk that are likely to directly impact the delivery of housing in the short term and two regeneration projects that are bringing in investment.

New road bridge in Lowestoft

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

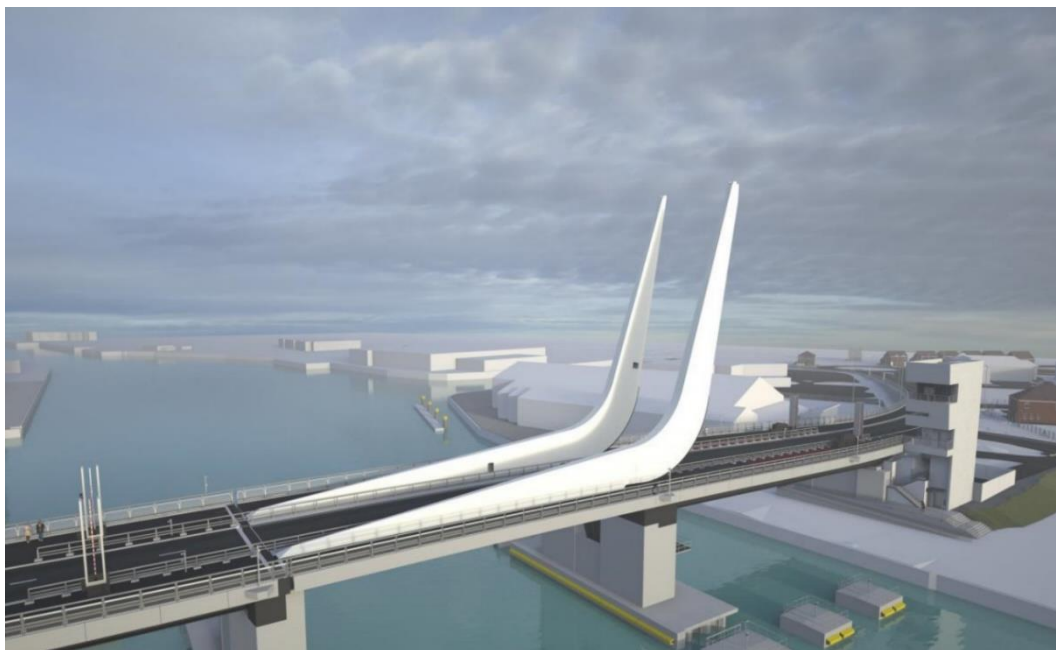


Figure 20 Lake Lothing Third Crossing image. Suffolk County Council Website July 2020 ⁵⁸.

⁵⁸ <https://gullwingbridge.co.uk>

3.25 The completion of the new bridge will be a boost to the Lowestoft economy and support the delivery of significant housing growth in and around the town. The new bridge will particularly benefit the regeneration of Lowestoft's largest brownfield site, the Kirkley Waterfront and Sustainable Urban Neighbourhood (allocated site WLP2.4). The bridge requires a new road to be built through part of the site to service existing businesses including the East Suffolk and Suffolk County 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.

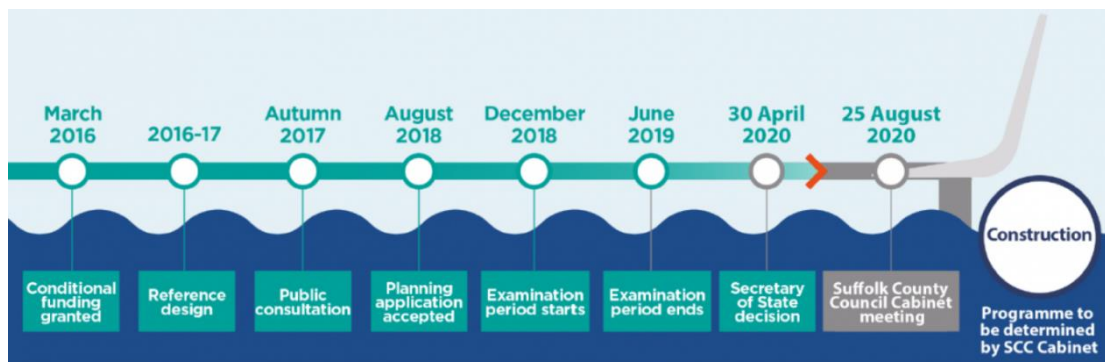


Figure 21 Lake Lothing Third Crossing timeline. Suffolk County Council Website July 2020⁵⁹

3.26 The bridge has been named the Gull Wing and work began in Spring 2021. As of May 2021, the following has been achieved:

- Completed demolition of some of the old Jeld Wen sheds off Waveney Drive.
- Buildings at the northern end of Durban Road demolished.
- UXO (Unexploded ordinance) investigations in the Lake in advance of marine piling completed with nothing found.
- Changes to traffic management necessary for the construction process⁶⁰

3.27 The following is due to begin:

- Land and marine piling.
- Site Compound Offices on South Side due to open.
- New access road off Waveney Drive called Colin Law Way.
- A utilities diversion work for Southern roundabout.⁶¹

⁵⁹ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/lake-lothing-3rd-crossing/>

⁶⁰ <https://gullwingbridge.co.uk/wp-content/uploads/2021/05/June-Newsletter-FINAL.pdf>

⁶¹ <https://gullwingbridge.co.uk/wp-content/uploads/2021/05/June-Newsletter-FINAL.pdf>

New flood Defences in Lowestoft

- 3.28 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 Kirkley Stream flooded following extreme rainfall affecting 30 nearby homes.
- 3.29 The Lowestoft Flood Risk Management Project has developed a strategy to protect homes and business by reducing the risk of flooding from the sea, rivers and extreme rainfall. The project will support the economic growth and regeneration of the town by significantly reducing the risk of flood for 100 years.⁶² 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.
- 3.30 The Department for Environment, Food and Rural Affairs (Defra) has awarded £43 million for the flood defences in Lowestoft. This is the largest single award from a £170 million national funding pot being divided between 22 flood defence projects across the UK.⁶³
- 3.31 The first flood defence works started on 27th July 2020 for approximately eight weeks. The works involve constructing a sheet piled flood defence wall approximately 300m long from the open space near Bloodmoor Road to behind the gardens of homes on Aspinall Close along Kirkley Stream.⁶⁴ Works also include construction of a pumping station that will be adopted by Anglia Water. The works will protect homes in Aldwyck Way and Velda Close.
- 3.32 In May 2021 the Lowestoft Flood Risk Management Project launched a virtual visitor centre that will remain open through the duration on the project. The virtual visitor centre provides people with the latest information on the on-going works. The visitors centre is available here:
- www.lowestoftfrmp.org.uk/consultations
- 3.33 The works to the inner harbour tidal defences will take place over three winters. The flood defences are planned for completion in spring 2026.⁶⁵

Lowestoft Town Centre Masterplan

- 3.34 The Lowestoft Town Centre masterplan is being prepared by East Suffolk Council's Economic Development and Regeneration Team to inform the regeneration of the town centre. The

⁶² <https://www.eastsuffolk.gov.uk/news/once-in-a-century-opportunity-for-lowestoft-secured/>

⁶³ <https://www.edp24.co.uk/news/43-million-funding-to-protect-lowestoft-1-6745318>

⁶⁴ http://lowestoftfrmp.org.uk/media/1370/2020-06-26-letter-to-residents-start-construction_.pdf

⁶⁵ www.lowestoftfrmp.org.uk/assets/img/1434404.pdf

masterplan is prepared in the context of changes in the way people shop and spend their leisure time and the impact of the Covid-19 pandemic. The masterplan sets a clear vision and aspiration, giving confidence to businesses, funders, consumers, and investors in Lowestoft. The strategy includes improving the overall appeal of the town centre as a place to live, as well as shop, work and spend leisure time.

- 3.35 The masterplan includes the regeneration of numerous sites across Lowestoft that could provide new homes as single use or as part of mixed-use development of a site. Clapham Road car park is proposed as a new mixed-use care/retired living facility. The Custom House and QD site are identified as a mixed-use development with a hotel, restaurant, retail units, apartments and terraced houses. The former Post Office has received planning permission for 9 residential units and commercial use on the ground floor. 18 Bevan Street East/Denmark Road offers the opportunity for leisure/ restaurants and up to 8 new homes. The former hospital site is proposed for a mixed-use development including a care facility, new homes, a shop and new public park. The former Tesco site is proposed for apartments new news houses.
- 3.36 The Lowestoft Town Centre Master Plan is available to view here:

<https://www.eastsuffolk.gov.uk/business/regeneration-projects/ltdcm/>

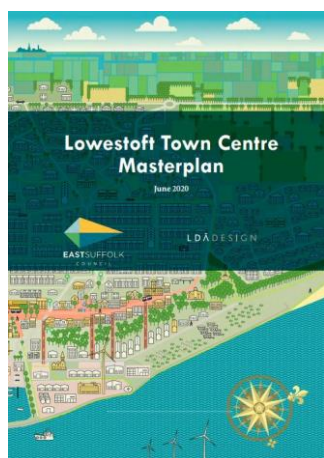


Figure 22 Lowestoft Town Centre Master Plan June 2020

Lowestoft Town Investment Plan

- 3.37 The Lowestoft Place Board in partnership with East Suffolk Council successfully secured a £24.9 million 'Towns Deal' for Lowestoft. The investment will act as a catalyst for attracting further funding and investment from both the public and private sector. The investment plan sets out an ambitious 10 year plan that aims to drive real change through investment in land use, economic assets, cultural assets, skills and enterprise infrastructure.

Details of the Lowestoft Investment Plan is available to view here:

www.eastsuffolk.gov.uk/business/regeneration-projects/lowestoft-investment-plan/

An update on the work of East Suffolk Planning Service

- 3.38 As reported in previous Housing Action Plans, in addition to two new Local Plans, East Suffolk Council has several initiatives, at various stages of development, to improve planning procedures and processes. The Local Plans are however the Council's primary tool for delivering new housing strategies and site allocations. The Local Plans, particularly the Waveney Local Plan, mark a significant change in spatial strategy and approach to site allocation. It is reasonable to expect the Local Plans to have a significant impact on housing delivery during the plan periods.
- 3.39 A detailed review of the East Suffolk Council Planning service is contained in the August 2019 Housing Action Plan and full details of how the Planning Service responded to the pandemic is available in the 2020 Housing Action Plan. Both are available on the Council's website. The following section reviews the progress made on issues and actions identified in the 2019 and 2020 Housing Action Plans and identifies new actions that will support housing delivery.

Newsletter

- 3.40 Several Planning and Building Control Newsletters have been published since the beginning of April 2020. The newsletters are available on the Council's website and provide updates on planning policy including consultations, information regarding planning applications and support, updates on coastal management, details of government Covid-19 and planning related legislation, and local energy and infrastructure projects. The newsletters are circulated to a number of agents and developers as well as Town and Parish Councils.
- 3.41 The Planning and Building Control newsletters are available to view at:
<https://www.eastsuffolk.gov.uk/planning/covid-19-updates/planning-newsletter/>

Pre-application service

- 3.42 The Council continues to operate a pre-application service offering advice on development proposals prior to the submission of an application. The service is not compulsory but is encouraged as it leads to better quality developments and an increased chance of a quicker decision on the application.
- 3.43 There is a charge made to cover officer time applied to 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.

East Suffolk Local Validation Requirements

- 3.44 The Council had previously identified an issue in relation to the varied quality of applications submitted that can cause delays at the validation process when the Council needs to request alternative or additional material. A consultation on a new Local Validation List was held between 6th May and 3rd June 2020.
- 3.45 The new East Suffolk Local Validation Requirement list was published in October 2020. The new Validation Requirements are available to view online here:
www.eastsuffolk.gov.uk/assets/Planning/Planning-Applications/Local-Validation-Requirements.pdf

Planning Committee Meetings

- 3.46 Throughout the pandemic East Suffolk Council has successfully maintained twice-monthly Planning Committee Meetings attended by Members and Planning Officers with the assistance of Democratic Services. The continuation of the meetings has helped the Council maintain its record for determining planning applications in accordance with Government targets. The meetings were held virtually to comply with social distancing and work from home restrictions and were broadcast via the East Suffolk Council YouTube channel.
- 3.47 Since 7th May 2021, the meetings are now a hybrid with Councillors and key Planning Officers attending in-person, other Planning Officers presenting virtually and members of the public able to attend either in person or virtually and watch via YouTube.

Planning Inquiry Appeals and Hearings

- 3.48 In 2020 East Suffolk took part in one of the pilot virtual planning inquiry appeals. Whilst not directly aiding local housing delivery it has supported the wider national measures to keep the planning and appeal process moving through the period of the pandemic. Virtual appeals and hearings are continuing to take place and the Council support's their speed and efficiency.

Speed of determination

- 3.49 As set stated above, the Council is currently meeting Government targets in relation to the speed of determination of all planning application types.
- 3.50 The table below show provides details on percentage and number of planning applications determined against the National and East Suffolk Council targets.

	Percentage	Total	Targets
Major Development	82%	37/45	60% National 65% Council
Minor Development	80%	460/574	65% National 70% Council
Other Development	90%	1624/1806	80% National 90% Council

Figure 23 1st April 2020 – 31st March 2021 planning determination statistics

Planning Conditions

- 3.51 The former Suffolk Coastal and Waveney planning services previously operated with separate sets of model planning conditions. It was recognised that that this could create uncertainty for regular developers and agents who submit applications across the East Suffolk area. The Council also recognised that planning conditions are particularly important given the need to agree pre-commencement conditions with applicants. Work on model planning conditions is complete and the Council now uses a single set of model conditions across East Suffolk.

Statement of Community Involvement

- 3.52 The Council's Statement of Community Involvement (SCI) was temporarily suspended on 21st April 2020 in relation to the posting of site notices. The Government then published guidelines on 13th May 2020 regarding temporary changes to the publicity requirements for certain planning applications during the pandemic. The temporary changes gave local planning authorities greater flexibility when publicising planning applications. Since October 2020 the Council has been operating its normal practice with site notices posted near to applications sites.
- 3.53 A new Statement of Community Involvement (SCI) was published in April 2021 that applies to both the work carried out by the Development Management Team and Planning Policy Team. The SCI provides the flexibility to enable the Council to maintain services and progress work in the event of any future social restrictions. The SCI is available to view here:

www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf

Section 106 agreements

- 3.54 The time taken from starting to negotiate and draft a S106 agreement until completion and signature varies significantly with no standard time frames and it is regularly cited as causing significant delay in issuing planning permissions. The speed is dependent on when the process starts in relation to other planning matters, the issues raised by consultees during

planning applications, the complexity of the issues involved, and the individuals involved in the negotiations.

- 3.55 The Major Sites and Infrastructure team was created in 2019, in part to better manage the S106 process. The Council has introduced the Exacom system in the last 18 months to support the S106 and CIL process enabling clearer and transparent monitoring and management of developer contributions. The Council also has a specific Planning Solicitor focussing on S106 work and a close relationship with its housing enabling team to provide support on affordable housing requirements with S106 agreements. As part of the production of its Affordable Housing Supplementary Planning Document the Council is looking to adopt model Heads of Terms and model clauses in relation to securing affordable housing through Section 106 agreement. It is anticipated that this will add further efficiencies to the Section 106 negotiation process.

Community Infrastructure Levy (CIL)

- 3.56 Very early attention was given to CIL and the impact of the pause in house sales on developer cashflow and CIL instalments through lockdown. East Suffolk was one of the first authorities to implement measures to change instalments and pause any late payment interest, along with a pause on CIL enforcement. This caught the attention of MHCLG who discussed steps they wished to take with East Suffolk and reviewed East Suffolk's approach before the introduction of national measures. This was specifically described in the RTPI Paper - Pragmatic and prepared for the recovery.
<https://www.rtpi.org.uk/media/5318/pragmatic-and-prepared-for-the-recovery.pdf>
- 3.57 Since the end of the first lockdown the CIL Team have collected more CIL payments than previous years. This indicates successful housing delivery across the district and effective implementation of the CIL charging schedule and collection of payments. The successful implementation of the CIL Charging Schedule across East Suffolk means the Council is now able to consider bids to provide important education facilities that will support the housing growth in the district.
- 3.58 The CIL Team's project to digitise all CIL and S106 information and enter the data into a new software programme called Exacom is underway. The project is being undertaken by two members of staff and is due to be completed in 2022.
- 3.59 The aim of the Exacom software is to manage and monitor CIL and S106 collections and payment in the future. The new Exacom software will record and publish in a user-friendly format the amount of potential funds available for future collection, the amount due from current development, the amount collected and the amount allocated. Exacom makes it possible to easily understand the various projects funded by CIL and S106 including affordable housing, community facilities, contributions to ecology and wildlife, education

(early years, Primary schools and Secondary schools), footpaths and cycle paths, healthcare facilities, and highways improvements and many more.

- 3.60 Whilst Exacom does not directly aid local housing delivery, it provides a quick, efficient method of collecting and monitoring CIL that enables the delivery of new infrastructure projects that will support new homes across the district.

Suffolk Coastal Local Plan

- 3.61 The Suffolk Coastal Local Plan was adopted on 23rd September 2020. To enable this to happen during the pandemic, the Planning Policy and Delivery Team made appropriate adjustments to ensure that the planning policy service continued to operate and that progress with planning policy documents to support housing delivery was able to continue. The Council put measures in place, via a temporary suspension to the Statement of Community Involvement and supported by an equalities impact assessment, to ensure that those who wished to participate in the consultation on the Main Modifications to the Suffolk Coastal Local Plan were able to. This included posting copies of consultation documents free of charge on request and through extending the consultation period to ten weeks (1st May to 10th July 2020). As set out above the Local Plan sets out a strategy to exceed the housing requirement of 9,756 homes over the plan period of 2018 – 2036, and following adoption the focus is now on delivering the Plan.

Supplementary Planning Documents

- 3.62 The East Suffolk Planning Policy and Delivery Team are developing a suite of Supplementary Planning Document (SPD) that support the planning policies within the Suffolk Coastal Local Plan and Waveney Local Plan. The SPDs provide additional information and guidance that may not increase the overall quantum of housing development but should support the delivery of housing development and/ or increase the quality of developments.
- 3.63 The SPDs that have been recently adopted or are under development are:
- The Affordable Housing SPD (under development)
 - Coastal Adaption SPD (under development)
 - Residential Development Brief SPDs (under development)
 - Healthy Environments SPD (under development)
 - Historic Environment SPD (adopted 2021)
 - North Lowestoft Heritage Action Zone Design Guide (adopted 2020)
 - Recreational Disturbance Avoidance and Mitigation Strategy SPD (adopted 2021)
 - South Lowestoft Heritage Action Zone Design Guide
 - Sustainable Construction (under development)

Affordable Housing Supplementary Planning Document

- 3.64 An Affordable Housing Supplementary Planning Document (SPD) is under development. The initial public consultation on the proposed scope and content of the SPD was held from 9th November 2020 to the 21st December 2020. The public consultation on the Draft Affordable Housing SPD is due to take place in late 2021 with adoption planned for early 2022.
- 3.65 The Affordable Housing SPD will replace the following adopted documents:
- Affordable Housing Supplementary Planning Document (May 2012) – this relates to the former Waveney local planning authority area;
 - Supplementary Planning Guidance 2 Affordable Housing (July 2004) – this relates to the former Suffolk Coastal area.
- 3.66 The Waveney Local Plan and the Suffolk Coastal Local Plan contain planning policies relating to securing affordable housing as part of new residential development and in relation to the development of ‘exception sites’ for affordable housing. The new Affordable Housing SPD will provide clear guidance on meeting policy requirements and will reflect that there are differences in the policy requirements in the Waveney Local Plan and the Suffolk Coastal Local Plan.

Residential Development Briefs

- 3.67 The Council has progressed with the preparation of residential development briefs, including undertaking consultation on a draft template in June and July 2020 and on a draft development brief for Land north of Union Lane Oulton (WLP2.14) in May and June 2021. The residential development briefs will highlight the considerations that any development on the sites will need to respond to and will outline the Council’s aims for each site without being prescriptive and allowing for innovative design. The residential development brief for Union Lane, Oulton (WLP2.14) is planned for in September 2021. Further residential development briefs will be progressed throughout 2021 and 2022.

RAMS

- 3.68 The Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is a joint project between East Suffolk Council, Ipswich Borough Council and Babergh and Mid Suffolk District Councils to reduce the impact of recreational use on Habitat sites caused by new residential developments in Suffolk. RAMS payments are requested for development of one or more new dwellings and some tourism development, within a 13km zone of influence from designated sites (known as European Sites), on the Suffolk Coast.
- 3.69 The Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document was adopted in May 2021 and is available online here:

www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Recreational-Disturbance-Avoidance/Suffolk-Coast-RAMS-SPD-final-May-2021.pdf

- 3.70 In relation to housing delivery, the RAMS SPD provides guidance for developers and applicants on the per dwelling financial contribution, including a section on how to pay, to support developers and applicants in providing their contribution to the necessary mitigation.

Rural Housing Delivery Group

- 3.71 A Rural Housing Delivery Group was established to increase the supply of rural affordable housing. It is co-ordinated by the Council's Housing Strategy and Enabling Manager and involves joint working between the Housing and Planning Services, in collaboration with Homes England.
- 3.72 Work is underway to identify areas across the district, particularly in rural areas, that have a high demand but low delivery of affordable housing and to then identify locations for possible exception sites for the delivery of affordable housing. The Council is also working closely with Parish Councils, community groups and Registered Providers to support and encourage community led housing projects. Related to the work of the rural housing delivery group, the Housing Strategy and Enabling Manager is providing support and information to the Planning Policy Team to assist the Affordable Housing Supplementary Planning Document and Neighbourhood Plan Guidance which are both currently being prepared.

Neighbourhood Plan guidance

- 3.73 The Council is producing Neighbourhood Plan guidance to help deliver housing through planning policies and site allocations in plans. The guidance will provide information on various house types including self-build and custom build houses. The primary focus will be community led housing. The guidance is due to be published late 2021.

Self-build and Custom-Build Housing

- 3.74 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) places a duty to maintain a register of interest and grant permissions to meet demand for self and custom build housing. East Suffolk Council has a positively planned approach to self-build and custom housebuilding in the district. The Council's Housing Enabling Strategy includes actions to support delivery of self and custom build housing. Furthermore, planning policies in the new local plans both support and require delivery of self and custom build housing.

- 3.75 The Council is exploring ways of directly contributing to the delivery of self and custom build housing through the Asset Management, Housing, Planning, and Regeneration teams working together. Additionally, processes have been put in place to enable developers/landowners bringing forward self/custom build developments to reach those people on the register, and to support those people on the register to find a plot. The self and custom build pages on the Council's website have been re-designed and interactive content added to help facilitate this.
- 3.76 The Council's website makes it possible for the public, developers and any other interested parties to access data and information connected to self-build and custom housebuilding in the district. This includes:
- An interactive map showing self/custom build plots which have been permissioned and/or are available to purchase (<http://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=858a43aacbad4078b98d715dd455d28f>)
 - Key statistics from the Council's Register, including an interactive map indicating areas of interest (<https://www.eastsuffolk.gov.uk/planning/self-build-and-custom-build/key-statistics-from-the-self-build-and-custom-build-register/>)
 - An open data portal where data on the Register and self/custom build permissions can be freely downloaded (<https://data-eastsuffolk.opendata.arcgis.com/search?q=self%20build>)
- 3.77 The Council has introduced a process whereby people on the register are notified when it becomes aware of new self/custom build plots available to purchase. There are also periodic updates sent to everyone on the register notifying them of self/custom build planning permissions which have been recently granted. These measures are aimed at supporting those seeking to acquire a self/custom build plot in the district.
- 3.78 Additionally, the Council will support developers, landowners etc. who are bringing forward self or custom build developments in reaching people on the register with the aim of a mutual benefit for all.
- 3.79 Self-build opportunities provide diversity in the housing delivery and contribute to reducing dependence on the small number of housing developers that operate in East Suffolk. The East Suffolk Housing Team have purchased a house in Campsea Ashe, Wickham Market that has been demolished and the plot is to be sold for self-build development.
- 3.80 The Council provides a constructive and supportive approach to self-build and custom housebuilding creating very positive conditions for supporting and delivering self/custom build in the district. This is borne out by the healthy supply of suitable plots which is expected to continue.

Review of the Brownfield Site Register

- 3.81 The Housing Enabling Strategy (2020-2025) aims to encourage and facilitate developers and Registered Providers in the delivery of new homes. The Council has published a Brownfield Register and the Housing Enabling Strategy confirms the Council's commitment to review the register each year (as required by national regulations) to provide up to date information on brownfield land that is available for development.
- 3.82 The annual review of the Brownfield Register in December 2020 considered whether the housing sites listed in Part 1 of the Register can be progressed and granted Permission in Principle and included in Part 2 of the Register. The benefits of progressing to a part 2 of the brownfield register was however considered minimal at this point given that many sites included have permission and of those that do not have permission many are allocated or form part of an allocated site. The Council will however keep its approach under review.
- 3.83 Information including an interactive map of brownfield sites is available on the East Suffolk website here: <https://www.eastsuffolk.gov.uk/planning/brownfield-land-register/>

Suffolk Charter and Design Management Process

- 3.84 In 2018 the Suffolk Growth Programme Board was awarded funding from MHCLG to develop an approach to high quality design that would achieve functional and beautiful aesthetic outcomes for communities.⁶⁶ The [Design South East](#) have led on the development of the Suffolk Charter and Design Management Process. It is endorsed by Ipswich Borough Council, East Suffolk Council, Suffolk county Council, Babergh and Mid Suffolk Council , and West Suffolk Council.
- 3.85 East Suffolk Council has been working together with other Suffolk Local Authorities to develop the Suffolk Charter and Design Management Process. The guidance should assist developers and give a greater understanding of and confidence in the design standards being sought across Suffolk. The guidance should ensure that high quality design standards are constantly sort and delivered across the whole of Suffolk. Improved design standard may not increase the overall quantity of homes delivered, but it should result in a better quality planning applications that assist in both the quick and efficient determination of planning and the delivery of higher quality homes.
- 3.86 Implementation of the Suffolk Design Management Process is anticipated to begin in early autumn 2021.

⁶⁶ www.suffolkdesign.uk/events-1/suffolk-design-member-training-implementing-the-charter-design-management-process

Suffolk Design: Street Guide

- 3.87 Suffolk County Council commissioned Stantec to produce new design guidance for streets for Suffolk. East Suffolk Council have been working together with other Suffolk Local Authorities to help develop the Suffolk Design: Street Guide.
- 3.88 The guide should improve the design and layout of new residential developments. The guidance includes requirements for footpaths, cycle routes, utilities and sustainable drainage. The guide provides a new design approach to developments that considers all the users, not just road networks and car users. The aim is to deliver attractive footpaths and cycle routes that are integrated into developments. Better design guidance is anticipated to result in better quality planning applications, supporting an efficient planning application process to assist in the delivery of new homes.
- 3.89 A public consultation was held on the Draft Suffolk Design: Streets Guide between December 2020 and February 2021. Suffolk County Council are working towards publication of the final document in Autumn 2021.

Recruitment and resources

- 3.90 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. Recruitment is ongoing to replace officers that have either left or have been promoted internally.
- 3.91 The Development Management Team has benefited recently from the recruitment of four new Assistant Planning Officers. The Planning Manager (Development Management) post which recently became vacant has been filled immediately internally.
- 3.92 A Major Sites and Infrastructure Team was created in 2019. The team works proactively to deliver housing growth and investment in infrastructure. The creation of this team allows specific officer time to be applied to the challenging needs of the largest housing and employment sites across the district, including a number of Garden Communities and Neighbourhoods which are key to the delivery of the new Local Plans. The Major Sites and Infrastructure Manager post is currently vacant, but recruitment is underway for a new Manager.
- 3.93 The Council has a Planning Performance Agreement (PPA) with funding from the Sizewell C Development Consent Order (DCO) to cover the temporary backfilling of staff during the DCO process. This will help ensure that work on the major Nationally Significant Infrastructure Project (NSIP) application will not impact the East Suffolk Planning Service's ability to support housing applications.

A Review of East Suffolk Council led housing developments

- 3.94 The East Suffolk housing programme is now building momentum and projections for 2022 onwards are growing in line with numbers identified within the Housing Development Strategy and the HRA (Housing Revenue Account) Business Plan.
- 3.95 The lower housing completion number in 2020/21 reflects the internal restructure and changes made within the Housing Team as well as the impact of the pandemic. The impact on housing delivery in 2020/21 therefore cannot be viewed as a direct impact of Covid in isolation. Examples of delays which are confirmed as a direct result of the pandemic, have been listed below.
- 3.96 10 unit scheme - pushed back from 2020/21 2 month delay (site closed in 2020) Competition date pushed back 8 months due to site closure, delivery delays and social distancing restrictions. – Completed.
- 3.97 7 unit scheme – 3 month delay due to social distancing restrictions and no. of trades on site. Still due to deliver within year. – Completed
- 3.98 8 unit scheme - Start on site delayed 13 months as a result of delays on other sites due to delivery delays and social distancing restrictions. – due for completion 2022/23.
- 3.99 10 unit site - pushed back from 2022/23 to 2023/24 due to social distancing restrictions. Project requires significant community involvement.
- 3.100 The Housing Team is not only planning to deliver new homes but to ensure that these have space to work from home comfortably as part of the minimum requirements within new build and acquisitions criteria.

Deben High School residential development

- 3.101 East Suffolk Council took over ownership of the former Deben High School site in Felixstowe from Suffolk County Council in November 2020. A proposal for a mixed-use site with 61 new homes built to PassivHaus standards, a community hall, indoor Bowls Club and Sports Hub was consulted on from December 2020 to February 2021.
- 3.102 The planning application (ref DC/21/0541/FUL) for the development of the site received planning permission on 3rd June 2021. The intention is for construction work to start on site in Autumn 2021.
- 3.103 The scheme has a consent for 61 new PassivHaus homes and indoor & outdoor leisure facilities. The housing element will be made up of 1, 2, 3 & 4 bedroom homes and will contain a mixture of affordable rent, shared ownership and open market homes. The level of

affordable home will be 68%, which is made up of 32 affordable rent and 10 shared ownership units.

3.104 Approximately £418K in affordable housing commuted sum payments have been committed to the development. This has enabled the development to provide a level of affordable onsite housing that exceeds the planning policy requirement of 33% affordable housing (Policy SCLP5.10 in the Suffolk Coastal Local Plan).

3.105 The commuted sums were collected from S106 contributions relating to three planning consents for other housing developments in East Suffolk. Some of the commuted payments in this instance need to be spent within 10 years, by 2031, and within the locality of Felixstowe.



Figure 24 Aerial View from exhibition information⁶⁷

Commuted Sums

3.106 Whilst the Local Plan policies expect affordable housing to be provided on-site, there are some exceptional circumstances where it is appropriate to receive a commuted sum in lieu of affordable housing provision on site. Commuted sums are to be spent on affordable housing development. The Council is currently developing a policy to inform the spending of commuted sums. Commuted sums may be spent by the Council or could be provided to Registered Providers where this is in accordance with the policy being developed. The objective behind producing a policy is to provide a basis for the Council to be proactive in identifying opportunities for spending commuted sums, to facilitate the delivery of affordable housing.

⁶⁷ www.eastsuffolk.gov.uk/assets/Leisure/Former-Deben-High-School-site-presentation/Former-Deben-High-School-full-exhibition-presentation.pdf

A Review of Developments in East Suffolk

3.107 The strategies of the two Local Plans include the delivery of large-scale strategic sites as well as a mix of medium and smaller scale sites. Strategic sites take time to come forward and involve a lot of preparatory work. The Council is engaging with landowners and agents, as appropriate, to support these sites in coming forward. The key projects and the progress made is detailed below.

3.108 There is regular engagement between Cabinet Members, the Head of Planning and Officers in the Major Sites and Infrastructure Team with a number of the major development companies operating in the East Suffolk area.

The Kirkley Waterfront and Sustainable Urban Neighbourhood

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

3.110 The site has outline planning permission on the westerly part for 1,180 homes, a retail centre, leisure facilities and a primary school.⁶⁸ The easterly part of the site has been developed with new offices for Essex and Suffolk Water, East Suffolk Council and Suffolk County Council.

3.111 The Council is committed to the development of the Kirkley Waterfront and Sustainable Urban Neighbourhood. Representatives of various service areas in East Suffolk Council including Economic Development and Regeneration, Housing, and Planning and Coastal Management are collaborating to progress the site. East Suffolk is also actively engaging with Homes England and the various landowners. Various site development options are available and being considered following the approval of the Lake Lothing Third Crossing and Lowestoft Flood Defence scheme receiving funding. Work is currently underway on a masterplan for the site.

3.112 Several sheds on the site are currently being used for storage in connection with the construction of the new bridge across Lake Lothing. A new road is to be provided through the proposed Kirkley Waterfront and Sustainable Urban Neighbourhood providing access the Riverside offices. The new road should encourage and support the development of the large

⁶⁸ Waveney Local Plan 2019. Page 55.

brownfield site. The road will be the first significant piece of infrastructure provided on the Kirkley Waterfront and Sustainable Urban Neighbourhood site.

North of Lowestoft Garden Village

- 3.113 The North Lowestoft Garden Village is a 71 hectares site to the east of A47 allocated under policy WLP2.13 in the Waveney Local Plan. The site is located within the parish of Corton, north of Lowestoft. The site is allocated for 1,300 home, a retirement community, primary school, local shopping centre, playing fields and 8 hectares of employment land. Policy WLP2.13 requires a masterplan to be prepared and adopted as part of a Supplementary Planning Document or Neighbourhood Plan.
- 3.114 Suffolk County Council (Corporate Property Division) as the landowner has commissioned a masterplan for the allocated site and a virtual public consultation was held from the 4th January to 15th February 2021 seeking feedback on the proposal before progressing to the next stage of the masterplan process.
- 3.115 The masterplan set out the vision and strategy for the long-term development of the allocated site and provided a conceptual master plan framework which will set the standard for future design and infrastructure provision.⁶⁹ Suffolk County Council are aiming to submit the proposed Masterplan to East Suffolk Council in the Autumn of 2021 for approval.
- 3.116 Officers in the Major Sites and Infrastructure Team and Planning Policy Team have been engaging with Suffolk County Council, as the site landowner, to bring forward the development of the North Lowestoft Garden Village. The site is now expected to be developed sooner than expected.

Beccles and Worlingham Garden neighbourhood

- 3.117 The Garden Neighbourhood is an almost 90 hectares site to the south of Beccles and Worlingham. The site is allocated under Policy WLP3.1 in the Waveney Local Plan for 1,250 new dwellings, a retirement community, primary school, country park, community hub (with convenient store and community centre) and 5 hectares of employment land.
- 3.118 Planning Policy WLP3.1 requires a detailed masterplan for the whole site to be informed by the outline masterplan provided by East Suffolk Council and ongoing engagement with the community. The outline masterplan for the whole site is available online here:

www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Beccles-and-Worlingham-Garden-Neighbourhood-Masterplan-Report.pdf

⁶⁹ www.northoflowestoft.co.uk/faqs/



Figure 25 Beccles and Worlingham Outline masterplan

3.119 The site is in multiple ownership. The Council is liaising with the different landowners and developers involved. The areas under different ownerships are likely to be progressed and develop at different times.

3.120 Larkfleet Homes, the developer for the west portion of the site have held a public consultation on their proposals for the site. Larkfleet's public consultation finished on 8th June 2021.⁷⁰

Land South of The Street, Carlton Colville/ Gisleham

3.121 The site in Carlton Colville and Gisleham is almost 55 hectares. The site is allocated under planning policy WLP1.26 in the Waveney Local Plan. The policy allocates the site for 900 new dwellings, a retirement community, primary school, country park, allotments, flood mitigation and local shops. The site remains undeveloped.

Brightwell Lakes

3.122 The Brightwell Lakes site near Martlesham was granted outline planning permission in 2018 by the former Suffolk Coastal District Council, and has recently been purchased by housebuilder Taylor Wimpey. The development is a strategic site in the Suffolk Coastal Local Plan and provides for up to 2,000 new homes, employment, school, sports facilities, a park and other community uses.

⁷⁰ www.eadt.co.uk/news/local-council/larkfleet-plans-for-950-new-beccles-homes-7985762

3.123 The Major Sites and infrastructure Team have engaged with Taylor Wimpey on the design and to progress the development. Taylor Wimpey plan to deliver the site in phases and the first two phases are subject to a Reserved Matters Planning Application due to be submitted in summer 2021. Taylor Wimpey will be delivering significant amounts of infrastructure upfront include major roads through the development connecting the school to Ipswich Road. Taylor Wimpey's first phase is expected to deliver 317 homes, public space and allotments, roads, footpaths and cycle routes.

3.124 Two teams of builders will develop separate parcels of land in parallel, each with their own style and design. Each team of builders is expected to deliver 60 dwellings a year, a total of 120 dwelling a year for the next 17 years from 2024.

North Felixstowe Garden Neighbourhood

3.125 The North Felixstowe Garden Neighbourhood (allocated under Policy SCLP12.3 in the Suffolk Coastal Local Plan) encompasses 143 hectares, and seeks to deliver a leisure led development, providing up to 2,000 dwellings as well as a new leisure centre, primary school and early years provision, green infrastructure and community uses. Land at Candlet Road was granted outline planning permission for 560 dwellings in 2017, on appeal prior to the preparation of the Suffolk Coastal Local Plan. This part of the Garden Neighbourhood is being brought forward by Persimmon Homes and reserved matters permission has recently been granted for 225 dwellings as Phase 1. The Council is landowner of a further part of the allocated site and is actively engaged in preliminary work seeking to bring forward the garden neighbourhood.

South Saxmundham Garden Neighbourhood

3.126 The site allocated in the Suffolk Coastal Local Plan under policy SCLP12.29 is for approximately 68 hectares. The site is located to the south of Saxmundham and largely between the east of the A12 and west of the B1121. The site is allocated for a mixed-use development of 800 new homes, a primary school, community centre and public open space. Policy SCLP12.29 requires the development of a masterplan to ensure the new garden neighbourhood integrates successfully with the existing community of Benhall and Saxmundham.

3.127 Pigeon Investment have development a masterplan and carried out a public consultation on the draft proposal that concluded on 31st January 2021.

Other sites

3.128 As set out above the Council is engaged in a programme of preparation of development briefs to assist smaller sites in coming forward. More generally in relation to smaller housing site allocations, the Council continues to seek to facilitate development through pre-application engagement and the determination of planning applications. To ensure continuity and an efficient determination process, it is intended that each site will have an identified internal informal 'team' involving officers from development management, policy and specialist services such as Design and Conservation and ecology, as appropriate.

Attracting housebuilders to East Suffolk

3.129 East Anglia, particularly Lowestoft, has long struggled with its easterly, peripheral location and poor transport connections to other areas of England and the UK. Suffolk has no motorways and no international airports.

3.130 Attempts to attract a greater number and variety of housebuilders to Lowestoft or the wider East Suffolk area through invites to developer forums have not previously been successful. The Council holds a bi-annual Developer Forum through which it provides information to, and seeks input from, the development sector on topical planning matters. A Developers Forum was held in January 2020 and consideration was given to holding further events in 2020 virtually but this was not considered feasible at the time. To provide the development sector with up-to-date information and advice in the short term newsletters are published on the East Suffolk website. A virtual Developers' forum was held in April 2021.

3.131 The Council will continue to invite a range of housebuilders to bi-annual Developer Forums in order to provide a forum to provide updates on the work of the Planning service and to discuss topical issues and importantly to also consider any issues that arise from the development sector.

3.132 The Council is producing development briefs for 'small sites' (i.e. other than the Garden Communities / Neighbourhoods) allocated for housing in the adopted Local Plans. In 2020 the Council sought views on the scope, aims and design of the draft template that will be used to help bring residential sites forward. The consultation on the template took place between 5th June and 24th July 2020. Consultation on the first of the Development Briefs being prepared, for Land north of Union Lane, Oulton (WLP2.14), was undertaken in May and June 2021. Responses are currently being considered and adoption is anticipated for September 2021.

3.133 The Council aims to use the development briefs as a tool to support high quality, inclusive and sustainable development. Once drafted the development briefs will take the form of Supplementary Planning Documents (SPDs) and be a consideration when determining

planning applications. The development briefs are intended to provide developers and applicants with concise and easily accessible information to support the design and layout of developments, as well as supporting the planning application process.

- 3.134 The production of development briefs for allocated sites, not only offers the opportunity to provide landowners, designers and developers with practical advice and information regarding development considerations but it also offers the opportunity to sell the opportunities and benefits of developing housing in East Suffolk. The development briefs will provide housebuilders with greater certainty regarding what is expected and possible on the site and therefore assist in speeding up the decision making process for planning applications.

4 Key Actions & Responses

Delivering Planned Growth

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

- The rise in volume housebuilders and decline of small and medium housebuilders, and the impact on housing delivery and build-out rates.
- The impact of homogenous house types on the housing market's absorption rate.
- Covid-19 national and local lockdowns/ restrictions.

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

Actions

- 4.5 The Council maintains a proactive approach to improving internal processes and procedures in the Planning service and is committed to improving housing delivery in East Suffolk. Several initiatives were conceived and started prior to drafting the first Housing Action Plan in 2019. There are therefore actions taking place or due to take place that do not relate directly to issues that have been identified in this plan but will assist in future housing delivery.
- 4.6 Recent and current uncertainties have shown that it is important to have up-to-date information on the housing delivery numbers and the issues affecting development in the local plan areas. The Planning Policy and Delivery Team collate data on housing completions quarterly which provide an indication of delivery issues. Regular engagement will take place with developers that are intending to start work on site in the next five years or have already started work on site, including to monitor the impact of the Covid-19 pandemic on housing delivery in the longer term. This may include further surveys in addition to the annual Housing Land Supply survey.
- 4.7 The actions detailed below focus on procedural improvements, policy implementation, monitoring and delivery, and the Planning service's resources. As stated earlier, the Council's Housing Enabling Strategy sets targets that are relevant to actions beyond the Planning service.
- 4.8 The table below includes a review of the progress made and status of previously identified issues in the 2019 and 2020 Housing Action Plan and new actions identified in this plan. The Council has not identified the need for any significant change in approach this year in terms of the actions set out below, the focus largely being on implementing the two Local Plans.

Action (outcome to be achieved)	Success	Revised Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Service/ owner	Notes
Procedural								
Review and consult on a new pre-application advice service.	Increased up take up of pre-application advice service	2021	Low	Underway	Underway	Ongoing	Development Management	The East Suffolk Council provides information on how to obtain pre-app advice.
Publish template Planning Performance Agreements for major sites	Swifter negotiation of PPAs and increased sign up leading to swifter decision making	2020	Low	Not started	Not started	Ongoing	Major Sites and Infrastructure Team	Part of the Suffolk Design Guidance Management process
Introduce an Accredited Agents Scheme	Faster validation service	NA	NA	Underway	Work ceased	NA	Development Management	The introduction of the scheme has been put on hold.
Publish an updated Local Validation List	Increase in the quality of planning applications preventing the need for requesting further information from applicants and enabling swifter validation of applications.	2020	High	Underway	Underway	Complete	Development Management	Published October 2020.
Introduce one set of model conditions	Consistent quality of service across the former Waveney and Suffolk Coastal areas	NA	NA	Underway	Complete	NA	Development Management	One set of planning conditions in use across East Suffolk.
Develop S106 templates with standard wording for different standard scenarios that would be published on the website	Reduction in the length of delays	2021	Medium	Underway	Underway	Underway	Major Sites and Infrastructure Team	Being undertaken through Affordable Housing SPD
Policy Implementation								
Affordable Housing Supplementary Planning Document	Adoption of new Supplementary Planning Document	2021	Medium	NA	Underway	Underway	Planning Policy and Delivery	Initial consultation held 09/11/2020 – 21/12/2020

Action (outcome to be achieved)	Success	Revised Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Service/ owner	Notes
A new Rural Housing Delivery Group including the Housing Team, Planning Department and Homes England	Facilitate an increase in the supply of rural affordable housing.	2021	Medium	NA	Underway	Underway	Planning Policy and Delivery, Housing, & Asset Management	
Annual review of the Brownfield register	Review of housing sites to create greater certainty for developers and speed up delivery.	2021	Medium	On-going annual review	On-going annual review	On-going annual review	Planning Policy and Delivery	The Brownfield land register is available online.
The Council will embed processes to facilitate delivery of self/custom build plots across the Asset Management, Housing, Planning, and Regeneration teams.	The Council will make land with planning permission for self/custom build development available for purchase.	2021	Medium	NA	Underway	Underway	Asset Management; Development Management; Housing; Planning Policy and Delivery; Regeneration.	
Ongoing monitoring of the impact of Covid-19 on the construction and future housing delivery.	Analysis of results and update actions	2020/21	High	NA	On-going	Complete	Planning Policy and Delivery	Mini Covid-19 survey carried out in early March 2021. Further surveys carried out as part of Housing Land Supply survey in June and July 2021.
Adoption of up to date Suffolk Coastal Local Plan	Planned approach to growth, which can be supported by the other actions identified above	Late summer 2020	High	Underway	Underway	Complete	Planning Policy and Delivery	The Suffolk Coastal Local Plan was adopted in September 2020
Establishment of Major Sites and Infrastructure Team	Planning Service able to bring together factors involved in delivery of sites	2019/20	High	Underway	Completed	–	Planning Policy and Delivery	

Action (outcome to be achieved)	Success	Revised Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Service/ owner	Notes
Production of design / development briefs and project plans for larger sites	Clear guidance to support submission of planning applications, improved design and less homogenous housing	2019/20	Low	Not started	Underway	Underway	Planning Policy and Delivery (Major Sites and Infrastructure)	Joint working with Suffolk County Council (as landowner) to produce a development brief/masterplan for the North of Lowestoft Garden village. Public consultation on the Suffolk County Council masterplan finished 15/02/2021.
Develop design briefs for small sites	Clear guidance to support submission of planning applications and support for small and medium housebuilders to East Suffolk	2021/22	Low	Underway	Underway	Underway	Planning Policy and Delivery	Early consultation on the scope, aims and design of the draft template for residential development briefs ended 24/07/2020. Residential development brief for land north of Union Lane, Oulton held 10/05/2021 – 23/06/2021.
Neighbourhood Plan guidance	Clear guidance to support Neighbourhood Plan policies and site allocation, and support self-build, custom build and community led housing.	2021	Medium	NA	NA	Underway	Planning Policy and Delivery	
Production of policy on the spending of Affordable Housing Commuted Sum Payments	Adoption of policy on spending of Commuted Sums.	2021	High?			Underway	Housing Strategy and Enabling service	The policy is in the final stages of preparation.
Monitoring and Delivery								
Develop and maintain a list of development sites (and use a 'RAG' system to prioritise resources to assist development)	More engagement with land owners and developers and the ability to act quickly to resolve issues	2019/20	Medium	Underway	Underway	Complete	Planning Policy and Delivery	The Major Sites and Infrastructure Team and Policy and Delivery Team maintain a spreadsheet of major residential development being progressed.
Resources								

Action (outcome to be achieved)	Success	Revised Timescale	Priority	August 2019 Status	August 2020 Status	July 2021 Status	Service/ owner	Notes
Re-advertise posts	Fill vacant post in Major Sites and Infrastructure Team	2021	High	Underway	Complete	Underway	Planning Policy and Delivery (Major Sites and Infrastructure)	Posts were previously filled. The Major Sites and Infrastructure Manager post has recently become vacant and recruitment is underway.

5 Delivery and monitoring of the Housing Action Plan

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

Future Housing Actions Plans and Housing Delivery Tests

- 5.2 The construction of new dwellings includes negotiating the sale of land, the development of a design, securing planning consent, technical design and specification, securing Building Regulations consents, and construction which altogether is a time consuming process, and is also dependent on the market. It is therefore acknowledged that delivery of the Local Plans is an ongoing action, and whilst some sites will deliver housing in the short-term others will deliver in the latter parts of the plan period.
- 5.3 The two Local Plans contain realistic housing trajectories which reflect the time necessary for the new housing strategies to impact building completions, and this is revisited each year through the Housing Land Supply. This Housing Action Plan reports on some wider issues related to housing delivery including Brexit and the Covid-19 pandemic. The Government considers the construction sector to be vital to the Country's economic recovery from the pandemic and that we do not have enough homes in the right places. The Government's Planning for the Future White Paper consultation closed on the 29th October 2020. The White Paper proposes a reform of the planning system in England to "*streamline and modernise the planning process, improve outcomes on design and sustainability, reform developer constrictions and ensure more land is available for development*"⁷¹ The reforms are referred to as being the most radical since the Second World War.
- 5.4 Each Local Plan also specifically contains policies that support small windfall developments. These include permitting residential development within designated settlement boundaries, having exceptions for affordable housing in the Countryside, permitting up to 5 dwellings in the Countryside subject to conditions, supporting self-build and custom build and supporting the use of gardens and urban infill sites. Small windfall developments have historically

⁷¹ www.gov.uk/government/consultations/planning-for-the-future/planning-for-the-future

provided a significant source of housing in East Suffolk. Small sites also usually have a quicker development that will assist short-term housing delivery.

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

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