Housing Action Plan

Identifying actions to support the delivery of new housing

2023 Review
Published April 2024



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1 Introduction

- 1.1 East Suffolk Council produces a Housing Action Plan annually. Previous Housing Actions have reported on progress and delivery made over the past year with actions and new challenges identified. The previous Housing Action Plan was published in November 2022. This latest Housing Action Plan for East Suffolk is focused on assessing and understanding housing delivery across allocated sites in the Suffolk Coastal Local Plan and Waveney Local Plan.
- 1.2 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. There was a transitional arrangement when the Housing Delivery Test was first introduced, and changes made to method of calculation to allow for issues with construction and housing delivery during the pandemic in 2020 and 2021.
- 1.3 In December 2022 the Government carried out a consultation on the 'Levelling-up and Regeneration Bill reforms to national planning policy'. The Government has published the outcomes of this consultation which are available online. This consultation contained proposals to change the Housing delivery Test. The Government delayed publishing the 2022 and 2023 HDT results while the responses from the consultation were analysed. The 2022 HDT results were published 19th December 2023. The 2023 HDT results have not yet been published. There has therefore been a resultant delay, along with the Council wishing to focus further on allocated sites, in the preparation and publication of the latest Housing Action Plan.
- 1.4 East Suffolk passed the Housing Delivery Test for 2022.

LPA Number of homes required N			Number of homes delivered				HDT		
	2019-	2020	2021-	Total	2019	2020-	2021	Total	result
	20	-21	22		-20	21	-22		
East Suffolk	833	581	902	2,316	832	715	853	2,400	104%

Figure 1 2022 Housing Delivery Test results (published December 2023)

1.5 The Suffolk Coastal and Waveney Local Plan areas were previously assessed separately, up to the 2019 results, and from the 2020 results onwards the results have been published at East Suffolk level. The previous Housing Delivery Test were as follows:

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

Figure 2 2018 Housing Delivery Test results (published February 2019)

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

Figure 3 2019 Housing Delivery Test results (published February 2020)

LPA	Numbe	er of hom	es requi	red	Number of homes delivered				HDT
	2017-	2018-	2019-	Total	2017-	2018-	2019-	Total	result
	18	19	20		18	19	20		
East Suffolk	691	886	833	2,410	877	923	832	2,632	109%

Figure 4 2020 Housing Delivery Test results published January 2021

LPA	Number of homes required			Number of homes delivered				HDT	
	2018-	2019	2020-	Total	2018	2019-	2020	Total	result
	19	-20	21		-19	20	-21		
East	886	833	581	2,300	923	832	715	2,470	107%
Suffolk									

Figure 5 2021 Housing Delivery Test results published January 2022

- 1.6 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.' East Suffolk Council has chosen to publish and update a Housing Action Plan for the whole district each year reflecting its corporate objectives surrounding housing delivery. The previous Housing Actions are available online to view here: www.eastsuffolk.gov.uk/planning/housing-action-plan/
- 1.7 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 Suffolk Coastal Local Plan area adopted in September 2020, and the Local Plan for the Waveney Local Plan area (excluding the area covered by the Broads Authority) adopted in March 2019. The two Local Plans set ambitious targets for housing delivery, along with site allocations and policies to bring development forward. In the Waveney Local Plan area, the Local Plan sought to address previous reasons for under delivery in the Local Plan with a range of site allocations that collectively exceed the minimum level of housing needed by approximately 12%. The Suffolk Coastal Local Plan also over-allocates housing land by around 16.5%.
- 1.8 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 housing delivery.

Purpose and scope of this action plan

- 1.9 The Council 'passed' the Housing Delivery Test result for 2022, with 104%. The Council 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. The housing requirements for East Suffolk are set out below:
 - Suffolk Coastal Local Plan area: 542 dwellings per year, as set out in the Suffolk Coastal Local Plan (2020).
 - Waveney Local Plan area: 374 dwellings per year, as set out in the Waveney Local Plan (2019).
- 1.10 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 design¹.

Methodology

- 1.11 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.
- 1.12 The methodology that East Suffolk Council has followed is summarised below. The Council has taken a proportionate approach that allows each Housing Action Plan update to be read as an independent document whilst also seeking to avoid unnecessary repetition of the information provided in the previous Housing Action Plan.
- 1.13 The 2020 Suffolk Coastal Local Plan sets out an ambitious requirement of 542 dwellings per year, based on the local housing need calculated under the Government's standard methodology. Housing delivery figures in the Suffolk Costal Local Plan area have in more recent years been below the requirement in the Local Plan.
- 1.14 The Waveney Local Plan area has consistently delivered fewer completions than the housing requirement. The 2019 Waveney Local Plan sets a requirement of 374 dwellings per year based on the objectively assessed need for housing evidenced by the Strategic Housing Market Assessment. This housing requirement is substantially higher than that in the previous

¹ https://www.eastsuffolk.gov.uk/planning/design-and-conservation/quality-of-place-awards/2022-quality-of-place-awards/

Local Plan of 290 dwellings per year, and the Local Plan acknowledges that it would be challenging to remedy the shortfall form earlier in the plan period over the first five years following adoption. The table below shows housing completion figures over the plan periods to date (Suffolk Coastal from 1.4.2018 and Waveney from 1.4.2014).

	2014/	2015/	2016/	2017/	2018/	2019/	2020/	2021/	2022/
	15	16	17	18	19	20	21	22	23
Suffolk	-	-	-	-	588	660	510	499	452
Coastal									
Local Plan									
area									
Waveney	136	135	264	284	297	159	201	323	360
Local Plan									
area									

Figure 6 Total annual housing completions

- 1.15 The Council annually publishes a <u>Housing Land Supply Statement</u>, setting out the number of years supply of land available for housing for each Local Plan area. The 2023 Housing Land Supply Statement confirms that the Suffolk Coastal Local Plan area has a housing land supply of 6.34 years and the Waveney Local Plan area has 5.62 years.
- 1.16 The past four annual Housing Action Plans have looked at global, national, regional and local issues that have impacted the constructed industry such as Covid-19, BREXIT, and supply chain issues. They also reviewed the work of the Planning Service that supports delivery and reviewed progress on strategic sites. The actions have been area wide rather than site specific.
- 1.17 Whilst the national and regional issues identified in previous Housing Action Plan continue to be a significant factor, this HAP focuses on issues at an individual site level. This Housing Action Plan seeks to understand further the issues associated with specific sites or types of sites. For the past few years, the annual housing delivery rates have been below the 542 target set out in the Suffolk Coastal Local Plan rate, and the 374 target set out in the Waveney Local Plan has not yet been met (albeit that in recent years completions have increased and come close to the requirement).
- 1.18 The key question this Housing Action Plan aims to address is:

what specific issues are impacting housing delivery on sites in East Suffolk?

- 1.19 To improve the Council's understanding of housing delivery, information gathering and analysis has been undertaken:
 - Analysis of Housing Land Supply Survey results, pre-application advice information, and planning applications;
 - Gathering and reviewing the knowledge of Development Management officers, Planning Policy officers, Building Control officers, and members of the Housing team;
 - An update of analysis of planning processes and stages of housing delivery, revisiting the analysis in the 2022 Housing Action Plan;
 - A review of planned developments in East Suffolk.

1.20 Linked to the analysis above is the aim to identify site specific actions that the Council can take to support housing delivery.

Suffolk Coastal Local Plan

- 1.21 The Suffolk Coastal Local Plan was adopted by East Suffolk Council in September 2020. The Suffolk Coastal Local Plan area has had strong housing delivery that exceeded annual requirements between 2015/16 to 2019/20. The 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.
- 1.22 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 an additional 800 dwellings over the plan period. The approach is to provide a diversity of supply of sites.
- 1.23 The requirement of 542 dwellings per year has not been met since the Local Plan was adopted in September 2020. However, these monitoring years were affected by Covid-19 restrictions and global supply chain issues. The figures show that over recent years the balance of windfall vs allocated site completions has shifted and we are seeing an increase in completions on allocated sites and a decrease on windfall sites. Major windfall developments (of 10+ homes) were consented 3 7 years ago prior to the adoption of the Local Plan; however, the figures show allocations now starting to make up a greater proportion of completions, as would be expected following the adoption of the Local Plan, whilst the majority of windfall sites deliver a single home. 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. The new large, strategic site allocations in the Local Plan have yet to start delivering completed houses and once these sites commence it should provide a relatively secure, long term annual supply of houses. Based upon previous performance the Council is confident that the requirement in the Local Plan will be met in future years.
- 1.24 Chapter 3 of this Housing Action Plan reviews the delivery of windfall development. A review of the data shows that windfall development in the Suffolk Coastal Local Plan area has declined since the adoption of the Site Allocations and Are Specific Policies in 2017, Felixstowe Peninsula Area Action Plan Area in 2017, and the adoption of the Suffolk Coastal Local Plan in September 2020. The delivery on allocated sites has not yet risen high enough for the annual housing target to be met.

	2019/20	2020/21	2021/22	2022/23
Net dwellings completed	660	511	499	452
Of which are on windfall sites	524	434	334	207
Of which are on allocated sites	136	77	165	245

Figure 7 Total annual housing completions on windfall and allocated sites in the Suffolk Coastal Local Plan area

Waveney Local Plan

- 1.25 The Waveney Local Plan 5 Year Review Assessment has been completed and published online. The review concluded that the local housing need has remained very similar to the housing requirement of 374 dwellings per year contained in the Waveney Local Plan. Although housing delivery has been below the annual target rate, there is no evidence to suggest that over the plan period the Local Plan housing requirement is not deliverable. Since the adoption of the Local Plan, housing completions have been rising overall (barring years impacted by Covid).
- 1.26 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 for 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 dwellings per year.
- 1.27 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.
- 1.28 The Waveney Local Plan was adopted in March 2019 and overall housing delivery has been steadily rising since the Local Plan was adopted in 2019, but remains below the annual requirement. The housing delivery figures were particularly low in 2019/20 and 2020/21 which could be attributed to developers waiting for the Local Plan to be adopted before progressing sites and to COVID-19 related issues in the construction industry. The total number of houses delivered annually has steadily increased since the Local Plan was adopted despite BREXIT, Covid-19, supply chain problems and other issues that have affected the construction industry across the country. It is possible that housing delivery would have risen

at a faster rate or reached a higher annual total if the construction industry had not been affected by the previously mentioned issues. Whilst progress has been positive, delivery has not yet reached the target of 374 set in the Local Plan. Monitoring of housing delivery will continue to be undertaken as the Plan is implemented.

	2019/20	2020/21	2021/22	2022/23
Net dwellings completed	156	201	323	360
Of which are on windfall sites	138	116	155	204
Of which are on allocated sites	18	85	168	156

Figure 8 Total annual housing completions on windfall and allocated sites in the Waveney Local Plan area

- 1.29 In the past four years the number of houses delivered on windfall sites has fluctuated between 116-204 dwellings a year. Some windfall dwellings have come forward on sites permitted before the adoption of the Waveney Local Plan and some are on sites permitted under the current Local Plan. In 2020/21 there were two sites that delivered 16 and 38 dwellings both located in Halesworth on sites permitted before the adoption of the Local Plan. In 2021/22 70% of windfall homes came forward on Woods Meadow in Lowestoft, a site permitted before the adoption of the Local Plan. In 2022/23 windfall numbers were boosted by 65 homes being delivered in an extra care village off Gosford Road in Beccles, a scheme permitted under the current Local Plan. Current Local Plan policies should continue to support windfall development in the future, but numbers are likely to continue to fluctuate.
- 1.30 There has been a significant increase in the number of houses delivered on allocated sites from 18 168 since 2019. There has also been an increase in the number of dwellings permitted on windfall sites from 174 236 since 2019. The figures show the importance that windfall (sites not allocated in the Local Plan) have on housing delivery in the area.
- 1.31 As larger and strategic sites within the Waveney Local Plan are developed the expectation is that a higher percentage of dwellings will be delivered on the allocated sites as time progresses.

Neighbourhood Plans

- 1.32 Neighbourhood Plans can provide for an opportunity to support housing growth, such as through additional allocations, at the local level. East Suffolk has a total of 41 Neighbourhood Plans (i.e., designated Neighbourhood Areas) at various stages of development, from area designation, Regulation 14 consultation, Regulation 16 consultation to being 'made' (adopted). As reported in previous 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.
- 1.33 There are currently 23 Neighbourhood Plans that have been made across East Suffolk. These are for:

- 1. Beccles
- 2. Bredfield
- 3. Bungay,
- 4. Framingham,
- 5. Great Bealings,
- 6. Halesworth,
- 7. Kesgrave,
- 8. Kessingland,
- 9. Leiston,
- 10. Lound, Ashby, Herringfleet and Somerleyton,
- 11. Martlesham,
- 12. Melton,

- 13. Mutford,
- 14. Oulton,
- 15. Rendlesham,
- 16. Reydon,
- 17. Rushmere St Andrew,
- 18. Saxmundham,
- 19. Shadingfield, Sotterley, Willingham and Ellough,
- 20. Southwold,
- 21. Wenhaston with Mells Hamlet.
- 22. Worlingham
- 23. Wickham Market
- 1.34 Several Neighbourhood Plans are at an advanced stage of development.
 - Westerfield Neighbourhood Plan Regulation 14 consultation concluded on 19th January 2024.
 - Easton Parish Council published their pre-submission consultation (Regulation 14) draft Neighbourhood Plan in February 2023. The Easton Neighbourhood Plan notably includes a site allocation for approximately 12 dwellings at land south-west of Wickham Market Road.
 - Easton and Playford Neighbourhoods both have Regulation 16 consultations which concluded on 19th January 2024 and subsequently proceeded to Examination. The Examiner's report for the Playford Neighbourhood Plan was received on 4th March 2024.
 - The Examiner's report on the Carlton Colville Neighbourhood Plan was received on 15th January 2024.
 - A referendum was held for Wickham Market in October 2023 with a majority vote in favour of the plan and the plan was 'made' (adopted) by the Council on 22nd November 2023. The plan contains two residential site allocations which together allocate land for approximately 110 dwellings.
 - New Neighbourhood Plan areas were designated in 2023 for Campsea Ashe neighbourhood area and Little Bealings neighbourhood area.
- 1.35 In the Suffolk Coastal Local Plan area, some 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.".

Adopted Neighbourhood Plans	No. allocated dwellings
Bredfield	30
Framlingham	105
Leiston	390
Wickham Market	110

Emerging Neighbourhood Plans	No. allocated dwellings
Easton	12

Figure 9 Allocated dwellings in adopted and emerging Neighbourhood Plans in the Suffolk Coastal Local Plan area

1.36 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 Kessingland Neighbourhood Plan allocates 3 sites and contains housing policies to support affordable housing and residential infill and backland development.

Adopted Neighbourhood Plans	No. allocated dwellings
Bungay	70
Kessingland	105

Figure 10 Allocated dwellings in adopted and emerging Neighbourhood Plans in the Waveney Local Plan area

- 1.37 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), prepared a methodology in 2021 for establishing a housing requirement if asked for one by a Neighbourhood Plan group. This enables 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 https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/preparing-a-neighbourhood-plan/.
- 1.38 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 affordable housing, self-build
- 1.39 and custom build houses and community led housing. The guidance is due to be published in the first half of 2024.
- 1.40 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/

1.41 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

- 1.42 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.
- 1.43 The Government chose to reflect the significant periods of lockdowns in 2020/21 in the method for calculating the 2020/21 housing delivery test result by reducing the 'homes required' by four months for that year. A reduction of one month was given for 2019/20.
- 1.44 Whilst data that underpins the calculation of the Housing Delivery Test will change over time, the Council can usually anticipate completions with some confidence. 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.
- 1.45 The Government published the 2022 Housing Delivery Test results in December 2023. The Government has previously aimed to publish Housing Delivery Test results for that year in November (although they are usually published the following spring). We would normally expect the 2023 Housing Delivery Test results in November 2023.
- 1.46 The 2023 Housing Delivery Test result for the period April 2020 March 2023 can be forecast with some accuracy using housing completion data.
- 1.47 For future Housing Delivery Test results there will remain uncertainties caused by the ongoing impact of 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.
- 1.48 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.
- 1.49 The housing need calculated on 1st April 2020 under the standard method (with allowance provided for lockdown) gave a total East Suffolk annual need of 581. This is below 916 Local Plans target and therefore, under the Housing Delivery Test Rule Book, has been applied for 2020/21 instead of the requirements in the Local Plans.
- 1.50 The housing need calculated on 1st April 2021 under the standard method (for East Suffolk using the 2014-based household projections and latest affordability ratios at the time) gave a total East Suffolk annual need of 902 homes. This is below the 916 Local Plans target and therefore, under the Housing Delivery Test Rule Book, was applied for 2021/22 instead of the requirements in the Local Plans.

- 1.51 The housing need calculated as at 1st April 2022 under the standard method (for East Suffolk using the 2014-based household projections and latest affordability ratios at the time) for the Suffolk Coastal Local Plan area was 573 and, for the Waveney Local Plan area was 387 giving a total East Suffolk annual need of 960 homes. This was above 916 Local Plans target and therefore, the Local Plan requirement figures were applied.
- 1.52 East Suffolk monitoring data for 2021-22 has recorded 499 completed dwellings in the Suffolk Coastal Local Plan area and 323 completed dwellings in the Local Plan Waveney area. The figures are adjusted to account for communal and residential care homes (use Class C2) and a total of 853 new homes were completed in East Suffolk in 2021-22.
- 1.53 East Suffolk monitoring data for 2022-23 recorded 452 completed dwellings in the Suffolk Coastal Local Plan area and 360 completed dwellings in the Waveney Local Plan area. Therefore, 812 new homes were completed in East Suffolk in 2022-23. There has been a loss in communal accommodation, but this is unlikely to have a significant impact housing delivery numbers.

LPA	Number of homes required				Number of homes delivered				2023
	2020	2021-	2022	Total	2020-	2021-	2022	Total	HDT
	-21	22	-23		21	22	-23		result
East	581	902	916	2443	715	853	812	2380	97%
Suffolk									

Figure 11 2023 Housing Delivery Test forecast for East Suffolk (using a Local Housing Need figure calculated by East Suffolk Council in accordance with the methodology in the Planning Practice Guidance)

- 1.54 The forecast 2023 Housing Delivery Test result for East Suffolk is 97%. A 95% result or higher will mean there is no requirement to produce a Housing Action Plan or to take any other measures.
- 1.55 The housing need calculated as at 1st April 2023 under the standard method (published in March 2022 for East Suffolk and the 2014-based household projections) for the Suffolk Coastal Local Plan area is 517 and, for the Waveney Local Plan area is 388 giving a total East Suffolk annual need of 905 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.
- 1.56 The December 2023 National Planning Policy Framework maintains that annual housing delivery test results will be published. The Government response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation are available <u>online</u>. The "government is not proceeding with any substantive changes to how consequences in the Housing Delivery Test will operate at this time".
- 1.57 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.

Future factors likely to affect forecasts

- 1.58 The Council understands that there are several possible reasons for the recent years' housing delivery figures falling below the Local Plan housing delivery targets such as:
 - The ongoing impact of Brexit and Covid, particularly on the availability of skilled labour in the construction industry.
 - A shortage of experienced planners and other professionals involved in the planning process, such as highway and drainage engineers, locally and nationally which is impacting the ability to deliver permissions.
 - An increase in the cost of energy.
 - An increased demand for and cost of building materials due in part to the pandemic.
 - The rising cost of living and the unknown impact on the economy and housing market.
 - The rising cost of borrowing and the impact on mortgages.
 - Difficulty in attracting a good range of housebuilders to the East Suffolk district.
 - Possible delays in housing delivery due to the timing of infrastructure projects. The
 Lowestoft Gull Wing is expected to be completed by summer 2024 but work on the
 Lowestoft Flood Barrier was stopped in January 2024 due to a significant funding
 shortfall.
- 1.59 Several of the challenges facing East Suffolk are ongoing and uncertain including the rising cost of living and rising cost of borrowing/ mortgages. The long-term impacts on the economy, construction industry and housing market in the coming years are currently unknown.

2 Housing Delivery Analysis

Introduction

- 2.1 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.
- 2.2 As reported in previous Housing Action Plans, in addition to two up to date Local Plans, East Suffolk Council has several initiatives, at various stages of development, to improve planning procedures and processes these include the development of Supplementary Planning Documents, and updated Validation Requirements List. The East Suffolk Housing Service also has a programme of house building. The Local Plans are, however, the Council's primary tool for delivering housing strategies and site allocations. The Local Plans, particularly the Waveney Local Plan, marked a significant change in spatial strategy and approach to site allocations compared to the previous approach. It is logical and reasonable to expect the Local Plans to have a significant impact on housing delivery during the plan periods.

The number of dwellings starting construction

- 2.3 The number of dwellings that start construction are known through reports made to East Suffolk Building Control, private Approved Inspectors and/or through annual onsite surveys carried out by East Suffolk Planning Policy officers. The numbers recorded are always highest in March when the onsite surveys are conducted by planning officers.
- 2.4 The number of homes that start construction obviously impact the homes completed and future Housing Delivery Test results.
- 2.5 Planning officers conduct site visits at the end of the financial year to accurately record housing delivery/completion figures. Homes that started construction earlier will be noted during the site visits, thus potentially giving the skewed impression that more homes started construction in March.

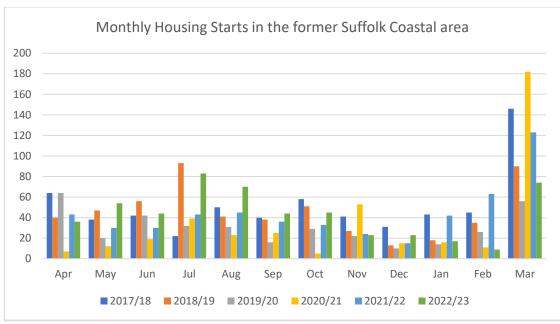


Figure 12 Monthly housing stars on site in the Suffolk Coastal Local Plan area

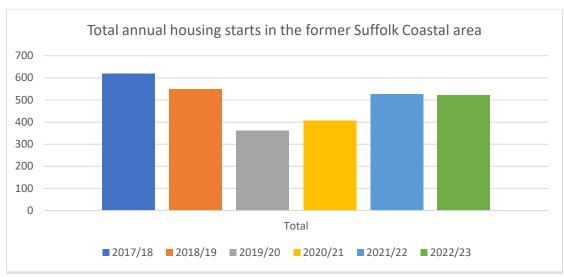


Figure 13 Total annual housing starts in Suffolk Coastal Local Plan area

- 2.6 There were particularly low figures recorded in April, May and June 2020 which can be attributed to the first Covid-19 lockdown. There was also a significant drop in starts in October 2020 and low figures recorded in December 2020 to February 2021 (due at least in part to further lockdown periods).
- 2.7 The total number of homes that started construction on site in 2022/23 is almost the same as the previous year (527 in 2021/22 and 522 in 2022/23).
- 2.8 The number of new of homes starting construction in the Suffolk Coastal Local Plan area remains lower than pre-pandemic 2019/20 levels. The low rate of housing starting construction on site could indicate lower delivery rates than a few years previous in the shortterm.

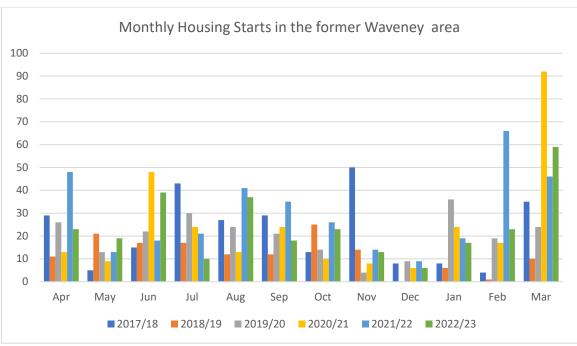


Figure 14 Monthly housing stars on site in the Waveney Local Plan area

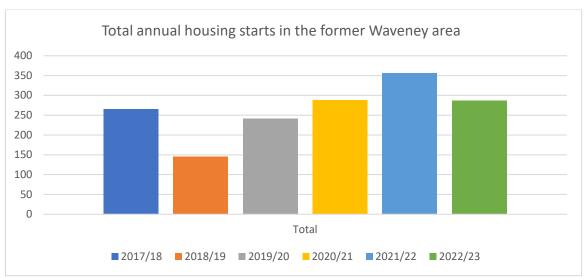


Figure 15 Total annual housing starts in Waveney Local Plan area

- 2.9 The number of homes that started construction dropped significantly in 2018/19 ahead of the new Waveney Local Plan being adopted in March 2019, but numbers increased the following two years (2020/21 and 2021/22) only to drop in 2022/23. The total number of homes that started construction on site in 2022/23 (287 homes) is almost the same as 2020/21 (288 homes).
- 2.10 The figures suggest that annual housing delivery in the Waveney Local Plan area is not going to increase further in the short term. However, at this stage in the life of the Waveney Local Plan, we would expect starts on site and the delivery of homes to increase as allocated sites are brought forward for development.

2.11 An update to the Approved Document Part L of the Building Regulations took effect on 15th June 2022 with transitional measures in place until 15th June 2023. The new building regulations (requiring higher standards of energy efficiency and overheating measures amongst others) apply to dwellings that were not under construction by 15th June 2023. A significant increase in the number dwellings that started construction prior to 15th June 2023 and a significant drop in the number starting on site after this date was noted. The figures strongly suggest that some developers rushed to start construction to avoid having to comply with the new, more costly, building regulations, a pattern which was observed nationwide.

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

2.12 The following graph reviews completed developments and shows the length of time from consent to work starting on-site in the Suffolk Coastal and Waveney Local Plan areas for dwellings completed in the years 2019 to 2023.

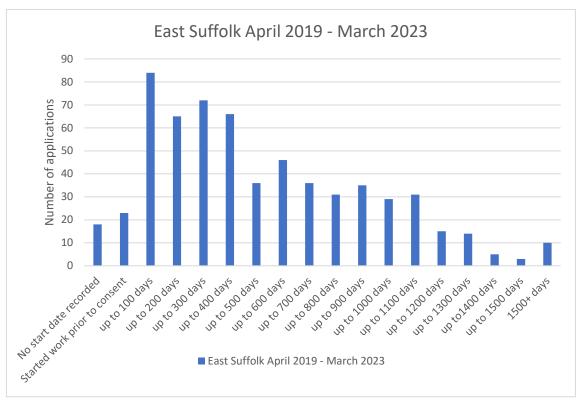


Figure 16 Length of time from final consent to work starting onsite

Suffolk Coastal

2.13 In the year 2022/23, 50% of the Suffolk Coastal Local Plan area developments completed in 2022/23 started construction within 446 days of consent being granted. This is a reduction in length of time compared to the previous two years, but is still longer than pre-pandemic 2019-20 levels. Sites included 5 medium site and 71 small sites. 30 of the sites are on 'greenfield' land and 46 are on previously developed land.

Waveney

2.14 In the year 2022/23, 50% of the Waveney Local Plan area developments started within 377 days of consent being granted. Sites included 1 large sites, 2 medium sites and 59 small sites.22 of the sites are on 'greenfield' land and 40 are on previously developed land.

East Suffolk

- 2.15 In East Suffolk (67 sites or) 49% of the sites developed delivered a single dwelling, highlighting the cumulative importance of small developments to overall housing delivery, while 21% of the total number of new dwellings were delivered on a large sites (50-499 units).
- 2.16 In 2022/23 for homes completed, the length of time from final consent to work starting on site was (typically) approximately a year. In previous years development in Suffolk Coastal took longer on average to start on site. In previous years the average time for work starting on site in Waveney has varied. Most of the sites started construction on site within the three years required under the standard planning conditions attached to decision notices.

3 Review of Windfall Development in East Suffolk

Introduction

3.1 Windfall development has historically contributed a significant proportion of the housing delivered in both the Suffolk Coastal and Waveney Local Plan areas. The Suffolk Coastal and Waveney Local Plans and their predecessors both have similar policies that support windfall development. The expectation is that the percentage of windfall development in each area will slowly decline over the years as delivery becomes more focused on allocated sites.

Suffolk Coastal Local Plan Area windfall permissions and completions

3.2 The Suffolk Coastal Local Plan anticipates 50 dwellings being delivered each year on windfall sites. The following table shows the number of windfall development permissions and dwellings granted permission in the Suffolk Coastal Local Plan area.

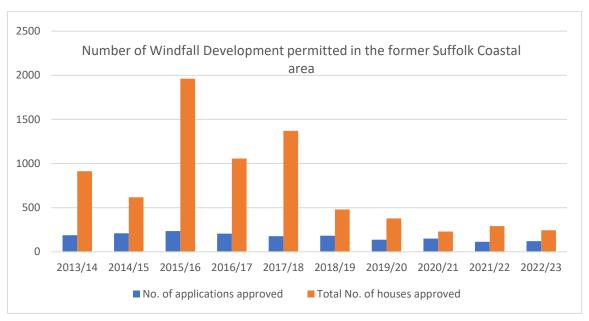


Figure 17 windfall permissions in the Suffolk Coastal Local Plan area

3.3 The figures include some limited double counting where applications have previously received outline planning permission and later received Reserved Matters approval. There are some larger developments with a history of being allocated or permitted before the adoption of the current Local Plan and have been recorded as windfall. The figures also include small numbers of Prior Approval applications.

- 3.4 During the three-year period from 2015-18 the number of planning application were slightly higher than average, but the total number of homes jumped significantly and was approximately double previous years. This indicates that during 2015-18 the size of windfall developments sites increased.
- 3.5 The following chart shows housing completions on windfall and allocated sites.

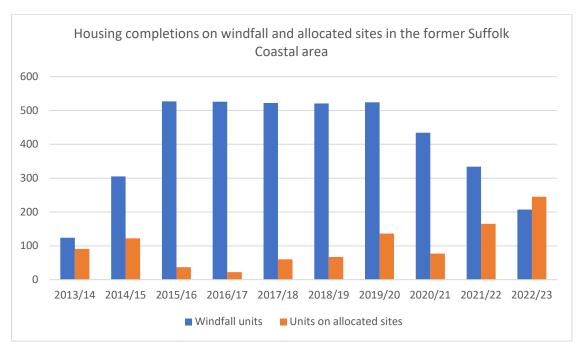


Figure 18 Delivery of housing on windfall and allocated sites in the Suffolk Coastal Local Plan area

- 3.6 The chart clearly shows windfall development in the Suffolk Coastal areas has been in steep decline since the adoption of the Site Allocations and Area Specific Policies in 2017, Felixstowe Peninsula Area Action Plan Area in 2017, and the Suffolk Coastal Local Plan in September 2020.
- 3.7 Ten years ago both windfall and allocated development was low. This could have been due to aftermath of the global economic crisis that began in 2007/8. Housing numbers then increased significantly and then remained at consistent high level for five years.
- 3.8 The recent significant decline in windfall developments has been accompanied by a small increase in houses being delivered on allocated sites. It was expected that the percentage of dwellings being delivered on allocated sites would increase and the percentage of windfall decrease following the adoption of the Site Allocations and Are Specific Policies in 2017, Felixstowe Peninsula Area Action Plan Area in 2017, and Suffolk Costal Local Plan in September 2020 and whilst this can be seen in the data, the increase is not as steep as had been envisaged. Between 2019/20 to 2022/23 the number of windfall development has dropped annually by 317.

- 3.9 The Suffolk Coastal Local Plan area has in past years been very dependent on windfall development to meet housing delivery targets. Since the Local Plan was adopted setting out a plan-led approach to development, a greater emphasis should be seen on allocated sites over future years.
- 3.10 The following chart showing net windfall completions in the Suffolk Coastal Local Plan area in each financial year by size.

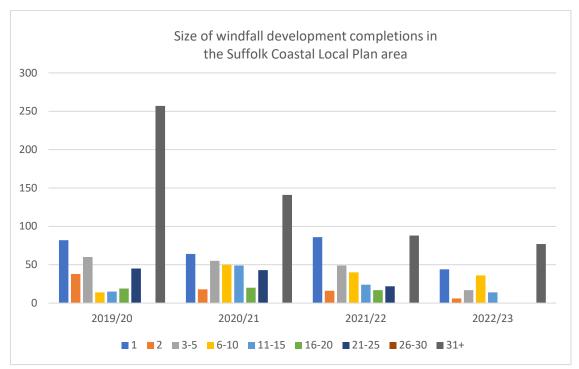


Figure 19 the size of windfall sites in the Suffolk Coastal Local Plan area

- 3.11 The number of net losses through windfall has remained very small and stable with a net loss of 5-8 homes a year. Net losses usually result when two homes are converted into one home, or a home is demolished.
- 3.12 The most significant decline in windfall developments comes from larger sites delivering 31 or more homes a year. Total annual windfall development on sites providing 31+ dwellings has dropped from 257 to 77 between 2019/20 to 2022/23.
- 3.13 Windfall development is usually associated with 'minor' residential development of 1-9 dwellings. Local Plans do not usually allocated sites of less than 10 dwellings. The following chart shows the number of dwelling completed each year on 'minor' residential developments.

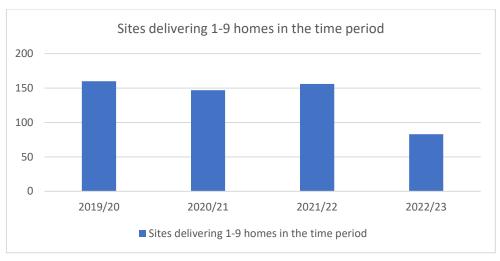


Figure 20 Number of small windfall sites in the Suffolk Coastal Local Plan area

3.14 The above charts shows that policies supporting small scale windfall development are delivering more than the at least 50 dwellings per year anticipated in the Suffolk Coastal Local Plan. This suggests that the planning policies are being successfully implemented, despite the drop in numbers in 2022/23.

Waveney Local Plan Area windfall completions

3.15 The following table shows the number of windfall permissions and dwellings granted permission in the Waveney Local Plan area.

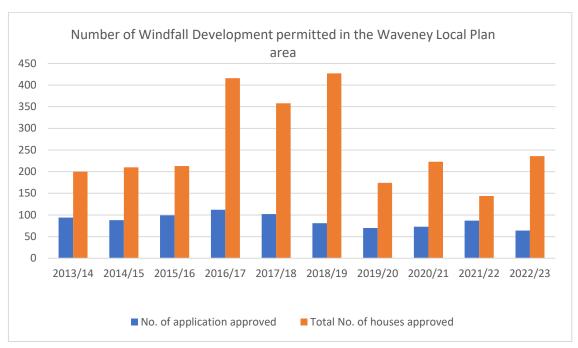


Figure 21 Windfall permissions in the Waveney Local Plan area

3.16 The figures include some limited double counting where applications have previously received outline planning permission and later received Reserved Matters approval. In recent years a development for specialist/retirement accommodation on Norwich Road in

- Halesworth received permission at appeal and there has also been approval in Lowestoft for the conversion of retail/commercial spaces.
- 3.17 During the three-year period from 2016-19 the number of windfall planning applications approved slightly increased, but the total number of windfall homes jumped significantly and was approximately double previous and later years.
- 3.18 Chart showing Housing completions on windfall and allocated sites

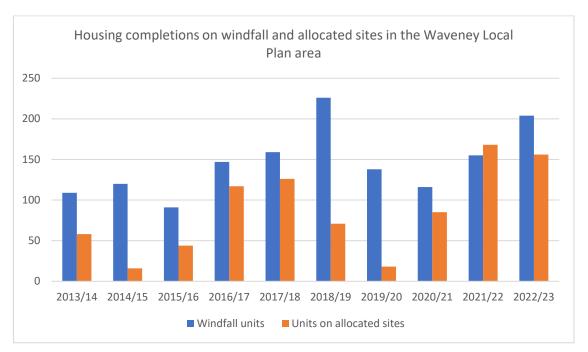


Figure 22 Housing delivery on allocated and windfall sites in the Waveney Local Plan area

3.19 Chart showing net windfall completions in the Waveney Local Plan area in each financial year by size.

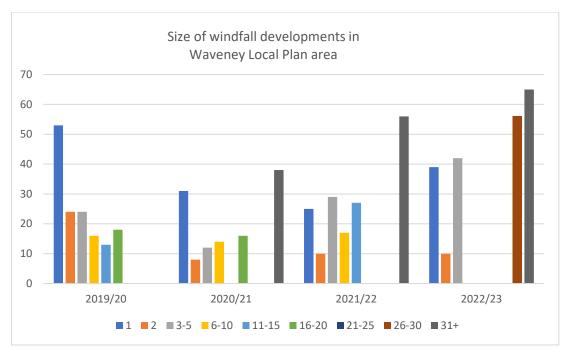


Figure 23 Size of windfall sites in the Waveney Local Plan area

- 3.20 The net number of dwellings being delivered each year on windfall sites that delivering 1-10 dwellings a year, is decreasing.
- 3.21 There has been a notable increase in housing delivery on windfall sites delivering 26+ units annually. This is largely due to a site in Halesworth being granted planning permission at appeal and a specialist accommodation/retirement development in Beccles. Land north and east of Hill Farm Road in Halesworth was granted outline planning permission in March 2018 and Reserved Matters approval in October 2018 for up to 160 dwellings. The site delivered 38 dwellings in 2020/21, 56 dwellings in 2021/22 and 5 dwellings in 2022/23. Ingate Ironworks in Beccles was granted planning permission in 2019 for an extra care village of 80 dwellings. The site delivered 15 dwellings in 2021/22 and 65 dwellings in 2022/23.
- 3.22 Windfall development is usually associated with 'minor' residential development of 1-9 dwellings because very few or no allocations of this size will be made in Local Plans. The delivery of completed dwellings on minor residential windfall sites fluctuates but shows that the planning policies are being successfully implemented.



Figure 24 Number of small windfall sites in the Waveney Local Plan area

Analysis of small scale residential/cluster developments in the Countryside

- 3.23 Policies were introduced in the Suffolk Coastal and Waveney Local Plans to support small scale housing development in the Countryside. The policies are:
 - SCLP5.4 Housing in Clusters in the Countryside
 - WLP8.7 Small Scale Residential Development in the Countryside
- 3.24 In the Suffolk Coastal Local Plan area a range of applications are recorded as being determined against the housing cluster policy. 47 of the submitted applications were permitted for the development of 1-3 dwellings against policy SCLP5.4 in the period from the Local Plan being adopted in September 2020 until 31st December 2023. The sites are due to deliver 65 new homes.
- 3.25 In the Waveney Local Plan area a range of applications are recorded as being determined against housing policy WLP8.7. 12 of the submitted applications, each for a single new dwelling, were permitted in the period from the Local Plan being adopted in March 2019 until 31st December 2023.
- 3.26 The flexibility offered by the planning policies SCLP5.4 and WLP8.7 has resulted in relatively small numbers of new dwellings being permitted. Both policies SCLP5.4 and WLP8.7 relate to residential development in the Countryside where only small scale developments are considered appropriate and the policies were not expected deliver high numbers of housing each year.

4 A Review of allocated sites in East Suffolk

Strategic sites in East Suffolk

- 4.1 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. Most sites are owned and developed by third parties not East Suffolk Council. As the Local Planning Authority, the Council is engaging with landowners and agents, as appropriate, to provide early and ongoing input, which should assist with the formal planning processes later on. The key projects and the progress made is detailed below.
- 4.2 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/landowners operating in the East Suffolk area.



Figure 25 Waveney Local Plan area

- 4.3 Strategic sites in Waveney and the approximate number of homes to be delivered:
 - WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood 1,380 homes
 - WLP2.13 North of Lowestoft Garden Village 1,300 homes
 - WLP2.16 Land South of The Street, Carlton Colville/ Gisleham 900 homes
 - WLP3.1 Beccles and Worlingham Garden Neighbourhood 1,250 homes

4.4 Site WLP4.1 Halesworth/ Holton Healthy Neighbourhood (215 homes) is not classed in the Waveney Local Plans as a strategic site. However, it is of wider significance because it offers sports facilities and a retirement housing.



Figure 26 Suffolk Coastal Local Plan area

- 4.5 Strategic sites in Suffolk Coastal and the approximate number of homes to be delivered:
 - SCLP12.3 North of Felixstowe Garden Neighbourhood 2,000 homes
 - SCLP12.19 Brightwell Lakes 2,000 homes
 - SCLP12.29 South Saxmundham Garden Neighbourhood 800 homes
- 4.6 Humber Doucy Lane is not classed as a strategic site in the Suffolk Coastal Local Plan. However, the site is a cross border site allocated for 150 dwellings in conjunction with land identified in the Ipswich Borough Council Local Plan, so is of some significance. The site is being developed in partnership by Hopkins and Barratts who have recently submitted Outline Planning Applications in both Ipswich Borough and East Suffolk.

The Kirkley Waterfront and Sustainable Urban Neighbourhood

4.7 The Kirkley Waterfront and Sustainable Urban Neighbourhood 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, marina facilities, and employment land and other elements.
- 4.8 There are large areas of the site that are currently vacant and without planning permission to be redeveloped. Some site landowners/agents are engaged in pre-application discussions with East Suffolk Council. Part of the site (the Brooke Marine site) was granted outline planning permission for 850 dwellings and a 1.5 form entry primary school (granted in 2015), although no substantial re-development has yet taken place The easterly part of the site has been developed with new offices for Essex and Suffolk Water, East Suffolk Council and Suffolk County Council.
- 4.9 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, Regeneration, Housing, and Planning and Coastal Management are involved in progressing the site. Several parcels of land have been purchased over the years by East Suffolk Council. East Suffolk Council's Planning Service is actively engaging with East Suffolk Council's Housing and Assets Services as landowners along with the other landowners and Homes England. A landowners' forum has been established for this purpose.
- 4.10 East Suffolk Planning Team is in the early stages of reviewing the 2013 Sustainable Urban
 Neighbourhood and Kirkley Waterfront Development Brief, through the preparation of a Planning Position Statement. As part of this, initial scoping work has taken place, and a public consultation is taking place during March and April 2024.
- 4.11 East Suffolk Council, as landowner for part of the allocated site, has been awarded a government grant for more than £4.2 million to help transform the former Sanyo and Survitec manufacturing sites adjacent to Lake Lothing, which form part of the Kirkely Waterfront allocation, under the Brownfield Land Release Fund. The grant will help fund the cost of land remediation on the former manufacturing sites. The Sanyo and Survitec sites were acquired by East Suffolk Council's predecessor, Waveney District Council, in 2018, having stood vacant since 2009.
- 4.12 Several sheds on the former Jeld Wen site are currently being used for storage in connection with the construction of the new Gullwing bridge across Lake Lothing. A new road has been through that site, providing access the Riverside offices and a future access to the former Jeld Wen site itself. The new road should encourage and support the development of the large brownfield site. The road is the first significant piece of infrastructure provided on the Kirkley Waterfront and Sustainable Urban Neighbourhood site.
- 4.13 The Kirkley Waterfront and Sustainable Urban Neighbourhood is the largest brownfield site allocated for development in the Waveney Local Plan and poses several serious challenges.

There are land contamination issues associated with the previous marine and industrial uses. Some of the buildings themselves contain asbestos. There are flood risk issues which will be challenging to address, as the tidal flood barrier in Lowestoft will not now be delivered, due to a significant shortfall in funding. The site will therefore require significant land raising and/or other flood mitigation measures. The site is in multiple ownership with the different parcels of land progressing at different rates. There is a need for co-ordination to ensure the overall design is cohesive, there are links north-south and east-west across the site, the infrastructure is delivered and located appropriately. The numerous ownerships make delivery of the necessary onsite infrastructure at the right time challenging but the Council is planning this carefully.

4.14 The review of the 2013 Sustainable Urban Neighbourhood and Kirkley Waterfront
Development Brief, development of a Planning Position Statement, and engagement with
landowners and Homes England will assist with resolving the challenges on this large,
complex site.

North of Lowestoft Garden Village

- 4.15 The North of Lowestoft Garden Village is a 71-hectare site to the east of the A47, allocated under policy WLP2.13 in the Waveney Local Plan. The site is located within the parish of Corton. The site is allocated for 1,300 homes, a retirement community, primary school, local shopping centre, playing fields and 8 hectares of employment land.
- 4.16 Suffolk County Council is the landowner and commissioned a masterplan for the allocated site with a virtual public consultation held from the 4th January to 15th February 2021 seeking feedback on the proposal.
- 4.17 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.²
- 4.18 A public exhibition on 24th May 2022 seeking local views on a proposed masterplan was held by Suffolk County Council. Exhibition material was also made available for comment online. This second consultation closed on 17th June 2022. Information on the exhibition is available online here: www.northoflowestoft.co.uk
- 4.19 Officers in the Major Sites and Infrastructure Team and Planning Policy Team have been engaging with Suffolk County Council to bring forward the development of the North Lowestoft Garden Village.

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² www.northoflowestoft.co.uk/faqs/

- 4.20 As part of the County Council's ambitions to deliver homes they have now established a joint venture for this site (and some of their other development sites across Suffolk) with Lovell Homes. Lovell Homes will take a more active role at the planning applications stage and will be responsible for taking forward reserved matters applications.
- 4.21 Progress on bringing the site forward has slowed due to ongoing conversations between the County Council (as landowner) and Anglian Water. A 'cordon sanitaire' is needed to ensure that odour impacts arising from the adjacent Corton Waste Water Treatment Plant are not unacceptable and the precise dimensions and details of the arrangement and any other mitigating measures are still being discussed. Planning officers are continuing to engage with the County Council and other key consultees to help to progress matters.

Land South of The Street, Carlton Colville/ Gisleham

- 4.22 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.
- 4.23 It is understood from the developer's agent that preliminary work and assessments of the land are being undertaken by a developer. However, at present the site remains undeveloped and no masterplanning has commenced yet and East Suffolk Council is not currently engaged in any detailed discussions with the landowners, developers or agents for the site but will be in regular contact with the agent to understand what is happening and try to encourage masterplanning progress.

Beccles and Worlingham Garden neighbourhood

- 4.24 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 five hectares of employment land.
- 4.25 Planning Policy WLP3.1 requires a detailed masterplan for the whole site to be informed by the outline masterplan provided by East Suffolk Council (in the Waveney Local Plan) 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



Figure 27 Beccles and Worlingham Outline masterplan

- 4.26 The site is in three separate ownerships and the Council is liaising with the different landowners, promoters and developers involved. More recently the two major landownership areas have actively been working together on early masterplan influences and on infrastructure planning.
- 4.27 A series of topic-based pre-application meetings have been taking place between the Council and the two groups of landowners/developers in recent months and good progress is being made.

Halesworth/ Holton Healthy Neighbourhood

- 4.28 The former middle school site, off Harrisons Lanes in Halesworth and Holton is allocated under Policy WLP4.1 in the Waveney Local Plan for mixed use including residential development, health care facility and retirement community, sport pitches and education/ training facility. The allocation is smaller than other strategic sites but is included in this analysis due to the mix of house types and on the onsite provision of infrastructure.
- 4.29 The site is in multiple ownership and separate planning applications have been submitted and approved for different areas and uses of the site. As the Local Planning Authority, East Suffolk Council has provided pre-application advice to the different landowners, developers, agents and community groups involved in the development. The Council encouraged landowners to submit planning applications for the sport and retirement facilities at the same time so cumulative impacts could be considered and delivery for both could be secured.

4.30 A planning application for the new football pitch and associated parking, access, and lighting was permitted in September 2023. A hybrid planning application for a retirement community that includes full planning permission for a 64 bed care homes and outline planning for 100 extra care apartments was permitted in March 2023. Outline planning permission has been granted for 190 dwellings and the Reserved Matters Application was approved in 2023 and development has now commenced.

North Felixstowe Garden Neighbourhood

- 4.31 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. Reserved matters permission has been granted for 255 dwellings as Phase 1, which is now under construction, and a reserved matters application for 305 dwellings as Phase 2 was granted in November 2023
- 4.32 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. £1.5million of Council funding has been made available to lead on masterplanning of the Garden Neighbourhood and to take forward planning submissions for the Council as landowner for part of the site. Associates from Public Practice have been appointed to take this forward, bringing experience from a private sector background to deliver on planning and housing opportunities. A timeline has been published on the dedicated website here North Felixstowe.
- 4.33 Public engagement commenced place in early 2024 with details available <u>online</u>. A planning application due to be submitted at the end of 2024/early 2025.

Brightwell Lakes

- 4.34 The Brightwell Lakes site near Martlesham was granted outline planning permission in 2018 by the former Suffolk Coastal District Council and was then purchased by housebuilder Taylor Wimpey, who are developing the site. The development is a strategic site in the Suffolk Coastal Local Plan and provides for up to 2,000 new homes, employment, new schools, sports facilities, a park and other community uses.
- 4.35 The Major Sites and infrastructure Team have engaged with Taylor Wimpey on the design and to progress the development. Taylor Wimpey plans to deliver the site in phases. Taylor Wimpey has provided access from the site to the A12 and will be delivering other 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. No housing completions have been recorded in the 2023 Housing Land Supply Statement but completions are expected in 2024/25. Three show homes have been completed and are now open for public viewing alongside substantial construction of the first phase. A website for the new community is now available: Brightwell Lakes

- 4.36 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 around 120 dwellings a year for the next 17 years from 2024.
- 4.37 The Taylor Wimpey website states the first phase of development consists of 317 new homes. The first 122 homes are located off Ipswich Road. They are advertising and homes were available to buy/ reserve from November 2023, it is understood that a number have been reserved for purchase already.
- 4.38 Outline planning permission for 2,000 dwellings, and reserved matters applications for phases for 173, 22, 119 and 3 dwellings have all been approved. The permitted applications will be constructed concurrently. The first completed dwellings are expected to in 2024/25 with delivery completed over 5 years. Details are in the 2023 Housing Land Supply Appendix.

South Saxmundham Garden Neighbourhood

- 4.39 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.
- 4.40 Pigeon Investment Management have developed a masterplan and carried out a public consultation on the draft proposal that concluded on 31st January 2021. East Suffolk Council will continue to engage regularly with Pigeon to provide pre-application advice and guidance.

Other site allocations in the Suffolk Coastal Local Plan area

4.41 Completed dwellings were delivered on Land to the east of Aldeburgh Road, Aldringham Cum Thorpe (SCLP12.42), Land to the east of Woodbridge Road, Bredfield (BD14), Land north of The Street, Darsham (SCLP12.48), , Land off Saxtead Road, Framlingham (FRAM19), Land off

- Vyces Road, Framlingham (FRAM22), The Green Shed, Framlingham (FRAM23), Land south of Ambleside, Kelsale cum Carlton (SCLP12.52), Land at Highbury Cottages, Leiston (SA1), Land at Red House Lane, Leiston (SA2), and Land north-east of Street Farm, Saxmundham (SCLP12.30).
- 4.42 The homes delivered have been located in small villages such as Aldringham through to large towns such as Felixstowe. The sites vary in size from sites with 8-560 dwellings permitted.
- 4.43 6 of the 12 allocated sites delivering completed dwellings were allocated on Neighbourhood
 Plans. This demonstrates that Neighbourhood Plans are a successful way to deliver small –
 medium scale residential developments in the district.
- 4.44 The sites with planning permission vary in size from sites with permission for 10-187 dwellings (excluding the North Felixstowe development with permission 560).
- 4.45 Housing completions and planning permissions were primarily focused on sites of 140 dwellings or fewer. This may reflect the economic and housing markets and the degree of risk and complexity that housebuilders wish to take on currently.
- 4.46 The long-term ability of East Suffolk to meet housing targets is dependent on strategic sites progressing and providing regular annual housing completions. Currently the only strategic site with construction taking place on site is Brightwell Lakes.

Other site allocations in the Waveney Local Plan area

- 4.47 Completed dwellings were delivered on the Western End of Lake Lothing (WLP26), Kirkley Waterfront and Sustainable Urban Neighbourhood (WLP2.4), Land west of London Road, Beccles (WLP3.2) and Land west of St Johns Road, Bungay (WLP5.2). The sites delivering homes vary in size from small developments of 19 located within larger strategic allocations, to sites with planning permission for 241 dwellings.
- 4.48 All the homes delivered have been located in the towns of Lowestoft, Beccles and Bungay. No small village or rural allocations have delivered completed dwellings, but some have received planning permission. The only strategic site that has delivered completed dwellings is the Kirkley Waterfront and Sustainable Urban Neighbourhood which has delivered 6 on a small infill plot.
- 4.49 The sites with planning permission vary in size from sites with permission for 1-241 dwellings (excluding an historic permission for the Kirkley Waterfront).

4.50 Housing completions and planning permissions were primarily focused on sites of approximately 10-35 and 150-240 dwellings. These sites allocations are on greenfield, have little or no onsite infrastructure requirements, and located in towns.

The Planning Delivery Dashboard

- 4.51 The new Planning Delivery Dashboard provides data for the monitoring year and an interactive map to support the Authority Monitoring Report. The dashboard shows the progress of housing delivery on sites allocated for residential development in the Local Plans.
- 4.52 The Planning Delivery Dashboard is expected to be useful to landowners, developers, and agents. The information maybe also be useful to Town and Parish Council's considering allocating land for residential development in Neighbourhood Plans.
- 4.53 The Planning Delivery Dashboard is available to view here:

 https://storymaps.arcgis.com/collections/dd0b8df0b000467bb958248e2c2762fc

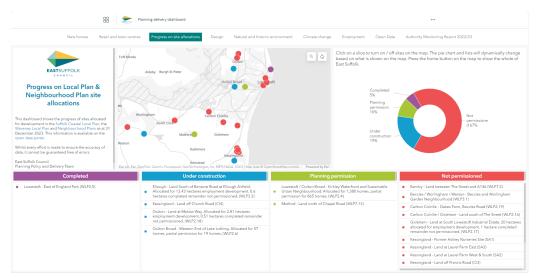


Figure 28 Planning Delivery Dashboard

5 A review of undeveloped sites in East Suffolk

Introduction

- 5.1 There are sites which have been allocated in the Local Plans, Neighbourhood Plans or granted planning permission that have either not started construction on site, construction appears to have stalled with no homes being delivered in recent years, or the annual delivery rate of housing is considered to be low. We would not expect all sites to be delivered within five years of the Local Plan being adopted and both Local Plan over-allocate to provide a buffer should any sites not come forward or come forward more slowly than anticipated, but it is important to understand whether there are issues with delivery and any steps the Council could take to assist delivery.
- 5.2 Work has been undertaken to evaluate these undeveloped sites. The evaluation has looked at allocated sites and sites with 5 or more dwellings that have not started construction. A site is considered to be delivering at a slower than expected rate where site that is allocated in a Local Plan or was granted planning permission has made minimal or no known progress since the adoption of the Local Plan. This includes;
 - No contact with the Local Planning Authority or request for pre-application advice,
 - No public consultations on masterplans where appropriate,
 - No submission of an application for planning permission for an allocated site,
 - No reserved matters submission for outline consents or no start on site for sites with full permission,
 - No response to the 2023 Housing Land Supply survey,
 - No delivery of housing in the past 12 months, or
 - No anticipated delivery of housing in the next five years.
- 5.3 Work has been carried out to assess progress and identify any issues that might be impacting housing delivery. The methodology for investigating sites is as follows:
 - The Housing Land Supply was used as a starting point to identify sites.
 - Contacting the site owner, developer, agent, architect or other point of contact available through the Housing Land Supply process.
 - Identify site specific issues and wider local issues.
 - Review whether the identified issues can be resolved with assistance from the Council.

5.4 Planning Officers have contacted landowners, agents and developers directly to identify issues and seek ways to address these where possible, and to encourage wider engagement with the Council to support more timely delivery of housing.

Allocated Sites with limited progress

- 5.5 Work has been undertaken to evaluate sites allocated in the two Local Plans which have slow delivery or have made no progress. 13 allocated sites in the Suffolk Coastal Local Plan area and 8 allocated sites in the Waveney Local Plan area have been reviewed.
- 5.6 The 13 sites in the Suffolk Coastal Local Plan area that have been reviewed vary from a 10 dwelling site in a village to a 300 dwelling redevelopment site and in total would provide approximately 757 dwellings. It was not possible to obtain up to date information on all the sites. Reasons for slow progress vary and include:
 - Land at Brackenbury Sports centre dependent on new leisure or sports facilities
 to be provided as part of the North Felixstowe Garden Neighbourhood before the
 site can be redeveloped,
 - Application refused and future work on hold,
 - Developer believed to currently be at capacity working on other sites,
 - Site owner looking for a potential development partner,
 - Onsite clearance costs impacting financial viability, and
 - Lack of current interest from the landowner in developing the site.
- 5.7 The 8 sites in the Waveney Local Plan area that have been reviewed vary from a 6 dwelling village site to a 900 dwelling strategic site in Carlton Colville and in total would provide approximately 1,063 dwellings. In some case part of an allocation is progressing, while another element in different ownership is not. Reasons for slow progress on all or part of an allocation vary and include:
 - Issues relating to an overage clause,
 - A small developer taking on a large development,
 - The owner of part of an allocation not bringing the site forward,
 - Interested developers waiting for a response from the owner,
 - Developers having trouble selling other properties within the area, so taking a cautious approach to nearby sites, and
 - Land for sale and unsold.
- 5.8 The delivery of 21 sites with a total of 1,820 dwellings could improve annual housing delivery figures for a period of a several years.
- 5.9 Work has also been undertaken to identify sites that maybe of interest to the East Suffolk Housing Team for development. Ten smaller sites allocated for 5-20 dwellings which have

reported little, or no progress have been identified and details provided to the East Suffolk Housing Team and they have been considered. The Housing Team currently have an ambitious programme of housing delivery.

Sites with Planning Permission with limited progress

- 5.10 There are non-allocated sites which have been granted planning permission that have either not started construction on site, construction appears to have stalled with no homes being delivered in recent years, or the annual delivery rate of housing is considered to be low. 15 sites across East Suffolk, that weren't in the Local Plans, were selected using the methodology above for further review. These sites have 5 or more homes that have not started construction or are under construction.
- 5.11 The slow delivering sites include a housing development in Carlton Colville with 124 homes outstanding, a 60 bed care home in Reydon, the redevelopment of a caravan site in Oulton Broad to provide 60 dwellings and several small 5 to 21 dwellings sites. The site in Carlton Colville has delivered a number of dwellings around the periphery of the site off Hollow Lane. The remaining dwellings require a junction to be created off Beccles Road and internal estate roads to be constructed. No homes are expected to be delivered in the next 5 years and no homes are under construction. A site in Reydon has completed numerous dwellings but not delivered the 60 bed care home that formed part of the application and permission. There is no information on whether there is any intention to construct the care home. Information on the redevelopment of a caravan site to provide 60 dwellings in Oulton Broad is unavailable.
- 5.12 Attempts to contact owners, developer and agents were not always successful. Some of the smaller sites are not progressing because market values are too low, the applicant plans to apply for planning permission for an alternative design, is awaiting planning approval, a lender stopped financing a development causing on-going delays, and the site now falls within a strategic site allocation and will be delivered as part of a comprehensive masterplan.

Conclusions

5.13 There is no clear pattern showing sites of a certain size, location or type of site is failing to progress and deliver housing. Actions to monitor sites, and to help to address lack of delivery where appropriate, that are not delivering housing have been added to the table in Chapter 6.

6 Key Actions & Reponses

Delivering Planned Growth

- 6.1 In East Suffolk the analysis and creative thinking to improve housing delivery has taken place through the plan-making process. The Housing Action Plan serves as a monitoring document to keep on top of any potential delivery challenges that may occur, and ensure housing is delivered as anticipated by the Local Plans.
- 6.2 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. The delivery of housing is monitored through the Annual Housing Land Supply (HLS) survey and Authority Monitoring Report (AMR).
- 6.3 There are issues beyond the scope of the planning service that 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.
- 6.4 Issues beyond the influence of the Council include;
 - Global supply issues, availability and price of materials.
 - Rising energy prices increasing the cost of materials and onsite construction.
 - Cost of living crisis and its impact developer financing, consumer confidence and the housing market.
 - 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.
 - Unrealistic land price expectations of some landowners.
 - Insolvencies of construction companies due to more cautious lending and higher interest rates – a Lowestoft-based housing construction firm went into liquidation in November 2023, for example.
 - Low viability of some sites.
 - The ability of the East Suffolk area to attract a diverse range of housebuilders there is a lack of competition for some sites and in some parts of the district, particularly in the former Waveney area.
 - The rise in volume housebuilders and decline of small and medium housebuilders, and the impact on housing delivery and build-out rates.

- 6.5 An annual Housing Action Plan offers the opportunity to 'check' the direction and success of each of the Local Plans and other initiatives.
- 6.6 East Suffolk Council has taken steps to support the delivery of sites allocated in the Local Plans. The following steps have been taken in the past few years to support housing delivery:
 - East Suffolk Council adopted a new Community Infrastructure Levy (CIL) Charging Schedule in August 2023. Some strategic sites and some areas, such as Lowestoft, have been zero rated for CIL. A zero CIL rating can assist sites and areas that have financial viability issues due to the amount of on-site infrastructure they are require to provide by planning policy or have financial viability issues to low market values in the area (because S106 developer contributions can sometimes be negotiated, but CIL cannot).
 - The Housing in Clusters and Small Scale Residential Development in the Countryside SPD (November 2022), Affordable Housing SPD (May 2022), and Sustainable Construction SPD (April 2022) have been adopted to provide additional guidance and support the delivery of housing.
 - A Planning Delivery Dashboard has been developed and published online in January 2024. The website provides data for the monitoring year and interactive mapping to support the AMR. It reports on the progress of allocated sites. The dashboard is a useful resource for landowners, developer and agents as well as Town and Parish Councils wanting to allocate sites in Neighbourhood Plans.
 - The Council has a pre-application advice service that provides advice specific to developments.
 - The Council's Major Sites Team works with applicants throughout the planning process to help deliver high quality schemes on strategic sites.
 - Over the past year the Council has recruited new staff to the Planning Policy Team,
 Development Management Team and Specialist Services team (Heritage and Ecology)
 Team. Having fully-staffed teams enables planning advice to be given and planning applications processed in a timely manner.
 - Planning Policy Officers have liaised with Housing Officers to see if East Suffolk Council might possibly be interested in delivering any of the sites directly.
- 6.7 Further on-going actions being taken to support housing delivery have been identified and listed in the table below.

Actions

6.8 The table below includes a review of the progress made and status of previously identified earlier issues of the Housing Action Plan and new actions identified in this year's 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. No

sites have been identified as being of potential interest to the East Suffolk Housing Team for development by the Council and no sites have been identified as appropriate, at this time, for CPO. Actions will be removed from the table in subsequent years once completed.

Ongoing and new actions table

Action	What success will look like once the action is complete	Action a priority for housing delivery	Date of first action	Current status of action	Service/ owner	Notes
Procedural					•	
Review of Pre- application advice service	Increased uptake of pre-application advice	Medium	2022	To be started and completed in 2024.	Development Management	Pre-app service is to be expanded to include collaborative arrangements with Suffolk County Council consultees (such as the Highway Authority)
Review of Local Validation List	Improved quality of planning applications	Low	2022	Ongoing	Development Management	The updated Local Validation List was adopted in April 2024 and comes into force on 1st May 2024.
Policy Implementation	1					
5-year review of the Waveney Local Plan	Confirmation we have planning policies that are effective to support housing delivery as planned in the Local Plan	High	2023	Completed March 2024	Planning Policy and Delivery	The 5-year review of the Waveney Local Plan has considered whether the planning policies, including the site allocations, remain effective. Maintaining deliverable site allocations is critical to maintaining a supply
Annual review of the Brownfield Register	Greater certainty for developers and increased speed of delivery	Medium	On-going annual review	On-going annual review	Planning Policy and Delivery	The Brownfield land register is reviewed each year in December and is available online
Development of a Self/custom build Supplementary Planning Document	This will provide guidance to support the delivery of self/custom build homes and implementation of	High	2022	Due for adoption in May 2024.	Planning Policy and Delivery	Consultation on the Draft SPD took place between 6.9.2023 and 18.10.2023.

Action	What success will	Action a priority for	Date of first action	Current status of	Service/ owner	Notes
	look like once the	housing delivery		action		
	action is complete					
	policies in the Local					
	Plans					
The Council will embed processes to facilitate delivery of self/custom build plots across the Asset Management, Housing, Planning, and Regeneration teams	Increased availability of land with planning permission for self/custom build homes, including direct provision by the Council	Low	2022	Underway	Asset Management; Development Management; Housing; Planning Policy and Delivery; Regeneration	Discussions between Planning Policy and other teams are taking place with the aim of agreeing actions to progress this. A Senior Planning Policy Officer has come on board to help move this forward. Work on the above SPD has taken priority over this action in the first instance
Preparation of Neighbourhood Plan housing guidance	Clear guidance to support Neighbourhood Plan policies and site allocations, including support for self-build, custom build and community led housing	Medium	2021	Due to be published summer 2024	Planning Policy and Delivery	Guidance currently being finalised and due to be published in 2024.
Preparation and adoption of a Planning Position Statement for the Kirkley Waterfront development	Adoption of a new Planning Position Statement for the site allocation that supports development of the site	High	2023	Due for adoption in September 2024	Planning Policy and Delivery	Initial consultation Marh- April and draft consultation in June-July 2024
Monitoring and Delive	ry		•	•		•
Developers Forum	More engagement with developers and agents	Medium	-	Annual events	Planning Policy and Delivery	Events held at least annually which provide important

Action	What success will look like once the action is complete	Action a priority for housing delivery	Date of first action	Current status of action	Service/ owner	Notes
						engagement with developers.
Develop and maintain a list of development sites	More engagement with landowners and developers and the ability to act to resolve issues where possible and appropriate	Medium	2022	Complete	Planning Policy and Delivery	This could be a pre-cursor to other specific actions.
Review progress of sites allocated for housing development in the Suffolk Coastal Local Plan and Waveney Local Plan and Neighbourhood Plans, as well as permitted sites that are not coming forward as expected, to consider whether there are specific actions that could be taken into sites where no or minimal progress has been made	Progress on delivery of sites. Conclusions to be reported in the 2023 Housing Action Plan	High	2022	Complete	Planning Policy and Delivery	Progress of allocated site reviewed and reported in 2023 Housing Action Plan.
Maintain an up-to- date list of sites that have slow delivery or where delivery has stalled	Progress on delivery of sites. Update to be reported in the next Housing Action Plan	High	2024	New action	Planning Policy and Delivery	This action will be integrated into the work programme for the Planning Policy and Delivery Team.
Identify and review sites that would	Progress on delivery of sites. This could be	High	2024	New action	Planning Policy and Delivery	This action will be integrated into the work programme

Action	What success will look like once the action is complete	Action a priority for housing delivery	Date of first action	Current status of action	Service/ owner	Notes
benefit from direct engagement with landowners and maintain contact	a pre-cursor to other specific actions. Update to be reported in the next Housing Action Plan					for the Planning Policy and Delivery Team.
Resources						
Recruit to vacant posts across the planning service, and retention of staff	A fully staffed service	High	2019	This is an ongoing action.	Planning Policy and Delivery and Development Management	

Completed actions table

Action	What success will look like once	Dated completed	Service/ Owner	Notes
	the action is complete			
Procedural				
Develop S106 template with standard wording for different standard scenarios that would be published on the website	Reduction in the length of delays	2022	Major Sites and Infrastructure Team	Template completed and incorporated in the Affordable Housing SPD which was adopted in May 2022
Introduce one set of model conditions	Consistent quality of service across the former Waveney and Suffolk Coastal areas	2021	Development Management	One set of planning conditions in use across East Suffolk
Introduce an Accredited Agents Scheme	Faster validation service	No longer require	Development Management	The introduction of the scheme has been put on hold
Policy Implementation				
Affordable Housing Supplementary Planning Document	Adoption of new Supplementary Planning Document	2022	Planning Policy and Delivery	SPD adopted in May 2022.
A new Rural Housing Delivery Board including the Housing Team, Planning Department and Homes England	Facilitate an increase in the supply of rural affordable housing.	N/A	Planning Policy and Delivery, Housing, & Asset Management	Following work with local communities the need for better housing information for local communities has been identified. The Board no longer meets.

Action	What success will look like once the action is complete	Dated completed	Service/ Owner	Notes
				A new Housing Enabling Officer has been appointed. If this work recommences this will be reported in future Housing Action Plans.
Adoption of up to date Suffolk Coastal Local Plan	Planned approach to growth, which can be supported by the other actions identified above	2020	Planning Policy and Delivery	The <u>Suffolk Coastal Local Plan</u> was adopted in September 2020
Establishment of Major Sites and Infrastructure Team	Planning Service able to bring together factors involved in delivery of sites	2020	Planning Policy and Delivery	Team set up and in place.
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	Strategic site owners developing masterplans independently with support the Planning Policy and Delivery and the Major Sites and Infrastructure Team	Planning Policy and Delivery	Working with Suffolk County Council (landowner) on the North Lowestoft Garden Village. Working with landowners, promoters and developers on strategic sites including those at South Saxmundham, Beccles and Worlingham and North Felixstowe
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	Planning Policy and Delivery	Residential development brief for land north of Union Lane, Oulton adopted 2021. Further design briefs not currently planned, but action will be revisited should the preparation of a design brief for any site appear advantageous
Monitoring and Delivery			•	
Ongoing monitoring of the impact of Covid-19 on the construction and future housing delivery	Analysis of results and update actions	2021	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
New dashboard with information on housing need available to the public	Dashboard being used by communities when considering rural exception sites, community	2022	No longer an action.	A new dashboard was being compiled detailing housing need from the Councils Gateway to Homechoice system, levels of

Action	What success will look like once	Dated completed	Service/ Owner	Notes
	the action is complete			
	led housing and neighbourhood			affordable housing in their area
	plan allocations			and housing costs at ward level.
				A new Housing Enabling Officer
				has been appointed. If the work
				recommences, this will be
				reported in the next Housing
				Action Plan.
Develop and maintain a list of	More engagement with land	2021	Planning Policy and Delivery	The Major Sites and Infrastructure
development sites (and use a	owners and developers and the			Team and Policy and Delivery
'RAG' system to prioritise	ability to act quickly to resolve			Team maintain a spreadsheet of
resources to assist development)	issues			major residential development
				being progressed

7 Delivery and monitoring of the Housing Action Plan

- 7.1 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.
- 7.2 The 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.
- 7.3 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.
- 7.4 Each Local Plan also specifically contains policies that support small windfall developments. These include permitting residential development within designated Settlement Boundaries, having exceptions for affordable housing in the Countryside, permitting up to 5 dwellings in the Countryside subject to conditions, supporting self-build and custom build and supporting the use of gardens and urban infill sites. Small windfall developments have historically provided a significant source of housing in East Suffolk. Small sites also usually have a quicker development that will assist short-term housing delivery.
- 7.5 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 between actions arising from the Housing Action Plan and delivery of housing on the ground.

Email us (a)

Planning Policy and Delivery Team (Local Plans)

Planningpolicy@eastsuffolk.gov.uk

Development Management (Planning Applications)

planning@eastsuffolk.gov.uk



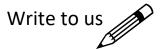


Planning Policy and Delivery Team (Local Plans)

01394 444557 / 01502 523029

Development Management (Planning Applications)

01502 523100



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

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